PRESIDIO

TUNNEL TOPS

ENVIRONMENTAL ASSESSMENT

PARTNERS

The Presidio Trust is the lead agency for this project, directing the planning, design, and construction effort and managing community outreach and engagement. The Golden Gate National Parks Conservancy, the non-profit partner to the Trust and the National Park Service, serves as the philanthropic and community engagement partner and supports park restoration and enhancement, education, and visitor service projects and programs. The National Park Service is engaged as the manager of the adjacent parklands at Crissy Field and as a partner in interpretation, visitor services and programming.

PRESIDIO TUNNEL TOPS

ENVIRONMENTAL ASSESSMENT
DECEMBER 2017

Presidio Trust

PRESIDIO
TUNNEL
TOPS

PRESIDIO TUNNEL TOPS PROJECT ENVIRONMENTAL ASESSMENT
PRESIDIO OF SAN FRANCISCO, CALIFORNIA

The Presidio Trust (lead agency), in consultation with the Golden Gate National Parks Conservancy and the National Park Service, Golden Gate National Recreation Area, has prepared this environmental assessment (EA) to examine the potential environmental impacts of alternatives being considered for the Presidio Tunnel Tops (formerly New Presidio Parklands) project in the Presidio of San Francisco, California. The EA describes the need for the proposed project, alternatives, the existing environment that could be affected by the project, the potential impacts from each of the alternatives, and measures proposed to avoid, minimize and/or mitigate potential adverse effects on the environment. The EA, combined with the technical attachments to the EA including the finding of no significant impact and errata, comprise the full and complete National Environmental Policy Act (NEPA) record of the analysis of environmental impacts and the Trust decision-making process for the project.

WHAT ARE THE PRESIDIO TUNNEL TOPS?

The Tunnel Tops are 14 acres of new, contiguous parklands atop and at the base of a dramatic bluff. The site is the result of the replacement of Doyle Drive, the 75 year-old freeway viaduct leading to the Golden Gate Bridge, with the Presidio Parkway, which includes an at-grade, tunnel-covered roadway. It extends from Lincoln Street to Mason Street, and from Halleck Street to the western portals of the new Main Post Tunnels and reconnects the two most expansive public spaces in the Presidio: the Main Post and the Bayfront at Crissy Field. The Visitor Center, in existing Building 210, is situated at the top of the bluff and will anchor a new visitor plaza. The Transit Center, in existing Building 215, will be remodeled to house a new café and expanded restroom facilities. The three acres at the base of the bluff will include the Youth Campus and the Learning Landscape, a nature playscape that will be open to the public. The Youth Campus is comprised of the newly renovated Crissy Field Center, in existing Building 603, two new buildings and a secured landscape. The new Lab building will be at the southeast corner of Building 603 and will provide two classroom spaces for youth programs. The new Field Station building will be southwest of Building 603. It will provide amenities for visitors and serve as a gateway to the Learning Landscape, situated to the west, adjacent to Mason Street. The Tunnel Tops have the potential to become a world-class public space, welcoming visitors of all backgrounds and confirming the Presidio as a definitive 21st Century national park site.

HOW CAN THE PUBLIC PARTICIPATE?

The Trust released the EA for public review on October 28, 2015. The Trust's announcements invited public comment for a 45-day period, which was extended by 36 days in response to public comment. During the public comment period, the Trust held two informational workshops on November 4 and December 3, 2015 to allow participants to learn more about the project and issues covered in the EA, and to provide comments. Additionally, the Trust offered eight site tours between October 30, 2015 and January 15, 2016. The comment period is now closed. Please read this EA, visit http://www.presidio.gov/tunnel-tops for the latest information about this project, how to get involved, and to learn about upcoming project events.

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1 PURPOSE AND NEED

1 PURPOSE & NEED

PURPOSE

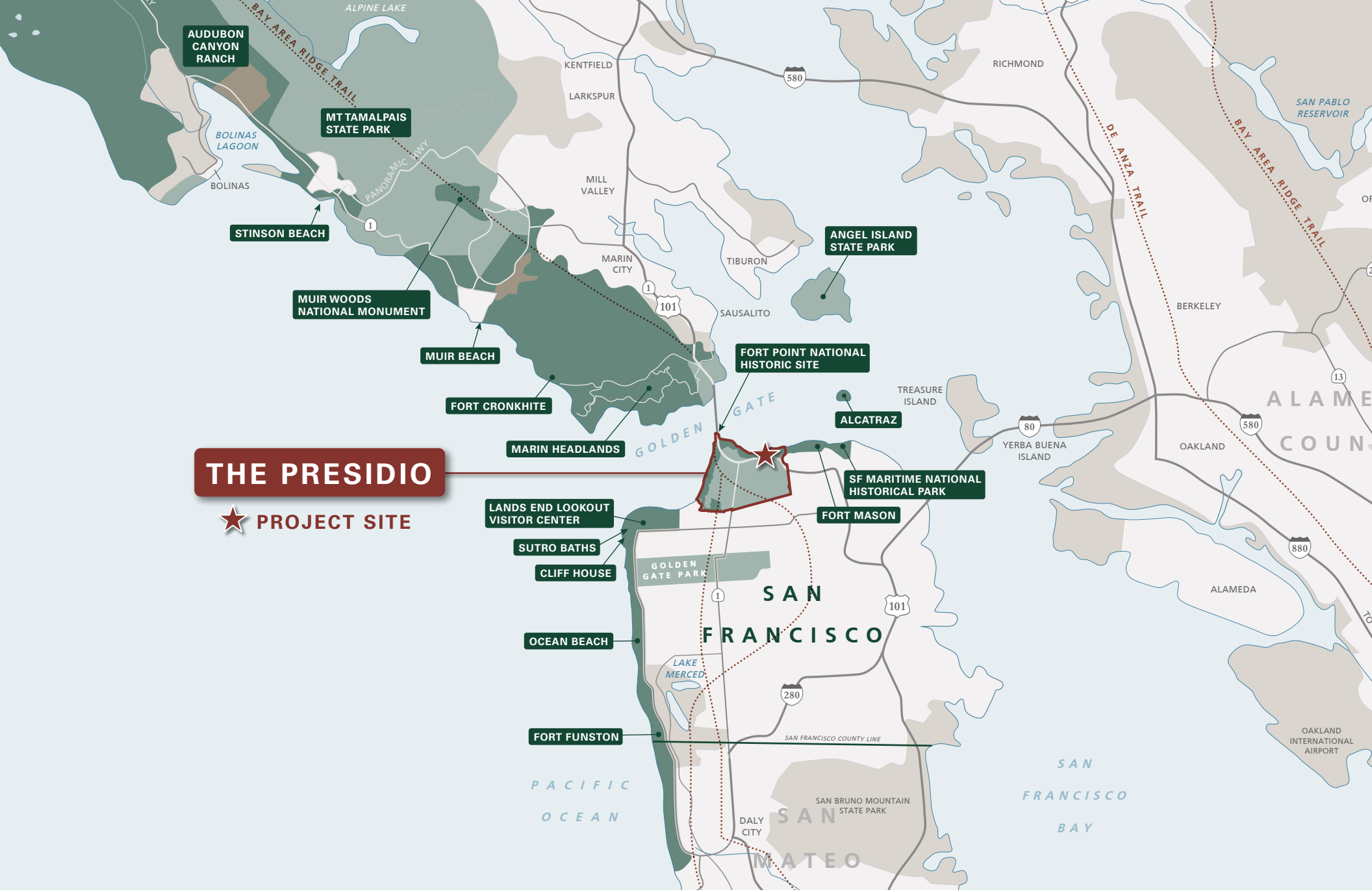
The Presidio Trust (Trust), working with the Golden Gate National Parks Conservancy (Conservancy) and the National Park Service, Golden Gate National Recreation Area (NPS), is designing a plan and programs for the New Presidio Parklands, 14 acres of new parklands that will be created in the Presidio atop a dramatic bluff with panoramic Golden Gate views (Figures 1 and 2). This opportunity came about as the result of the demolition of Doyle Drive, the 75-year-old freeway leading to the Golden Gate Bridge, which is being replaced by the Presidio Parkway, a new at-grade tunnel-covered roadway that will connect the two most public spaces in the Presidio: the historic Main Post and the bayfront at Crissy Field. The 14-acre project site also includes three acres of newly designed parklands adjacent to the Crissy Field Center (Building 603), including facilities and grounds for youth programs offered by the Trust, Conservancy and NPS.

The Council on Environmental Quality (CEQ) National Environmental Policy Act (NEPA) Regulations require a statement of "the underlying need to which the agency is responding in proposing the alternatives including the proposed action" (40 CFR 1502.13). The following provides a brief discussion of the need for the parklands project, focusing on its overall vision and goals..

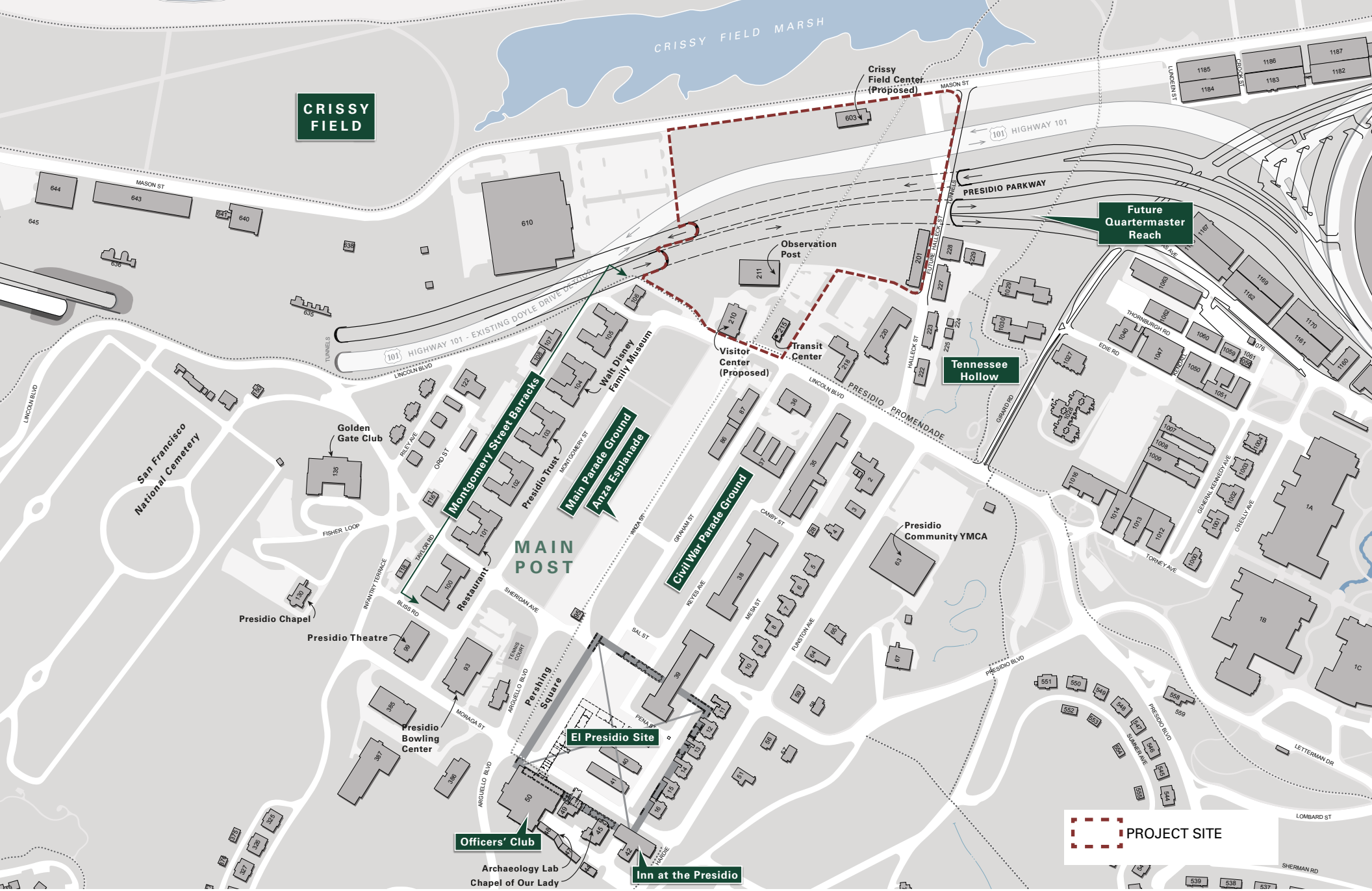
BACKGROUND

For more than two centuries the Presidio was a major military post. Rising prominently above San Francisco Bay, it earned the title "defender of the Golden Gate." Today, the 1,500-acre Presidio is a new kind of national park – a place of natural beauty, a site of great historic significance, and a unique public resource where people live, work and play. The parklands project is a vital chapter in the Presidio's ongoing evolution. A portion of the elevated highway that cut through the Presidio for seven decades has been replaced with an at-grade roadway hidden from public view by discrete tunnels. This creates a once-in-a-lifetime opportunity to establish a new 14-acre landscape that integrates the Presidio's northern waterfront (Crissy Field) with the Presidio's historic core (the Main Post) from which visitors can experience the Presidio, access the shoreline, and view the Golden Gate Bridge. The project site has the potential to become one of the most distinctive park sites in the country, welcoming a broad cross-section of local, national and international visitors to the Presidio. It is expected to offer a high quality park experience and feature an array of visitor-serving amenities and activities necessary to welcome the public, enrich their visit, and encourage them to return. The parklands project was foreseen in the Presidio Trust Management Plan (PTMP), the Trust's land management plan for Area B (Trust 2002a).

"The reconstruction of Doyle Drive could reconnect the Main Post to Crissy Field both physically, by allowing for more access points between the two districts, and visually, by restoring important views of the shoreline and bay."
– PTMP, page 63



1 REGIONAL CONTEXT



2 PROJECT SITE

The Presidio holds a special place in San Francisco. A great reserve of nature, ecology, culture and history set at the point where the city meets the bay. The New Presidio Parklands will leverage this extraordinary position to create a magnificent new place for all of San Francisco, effectively connecting city to bay, Presidio to Crissy Field and Crissy Field Marsh, and historical and cultural legacy to future generations. – James Corner Field Operations (2015a)

NEED

Millions of people each year already enjoy the stunning views, landscape, and recreational opportunities at Crissy Field. Yet many do not realize that Crissy Field is a part of the Presidio. The reason is that when Doyle Drive, an elevated freeway to the Golden Gate Bridge, was constructed through the Presidio in 1937, it created a physical barrier separating the Main Post from the northern shoreline. Doyle Drive has been demolished and has been replaced by the Presidio Parkway. With the recent opening of this new at-grade tunnel-covered roadway, the waterfront can now be reconnected with the Presidio's historic center. The New Presidio Parklands is a bridging site that sits atop or is adjacent to the new man-made tunnels. The southern edge of the site adjoins a historic formal military landscape, and the northern edge adjoins the restored Crissy Field Marsh. The site offers 360-degree views of the Golden Gate Bridge, San Francisco Bay, Alcatraz, the city skyline, the Main Parade, and the Presidio hills and forest.

VISION

The new parklands will welcome all visitors and offer a profound and glorious experience of the Golden Gate. The parklands project will be a platform for programs that celebrate and provide insight into all that can be seen from this new vantage point. The new parklands will provide information and services to make visitors comfortable. The new parklands will be embraced by our community, especially those who have not had opportunities to visit our national parks, as well as by general park visitors. The new parklands will be the gateway to the entire Presidio.

GOALS

The Trust, NPS and Conservancy hope to accomplish the following with this project:

- Honor the significance of the Presidio
- Offer a magnificent experience of the Golden Gate
- Welcome all
- Integrate the natural landscape of Crissy Field and the cultural landscape of the Main Post
- Create the best place to begin a Presidio experience
- Provide exceptional environmental learning opportunities

PROJECT SITE

The project site encompasses two interconnected areas:

- Parklands to be created above the roadway tunnels, including trails, overlooks and spaces that celebrate the spectacular views and inspire repeat visits. Picnic tables, camp fire sites, and interpretive environments for children and adults are ideas that have been contemplated to date. The designed landscape includes a reimagined Visitor Center (Building 210) that functions as a base camp for the 1,500-acre park, and that also hosts a Transit Center and food service. Here people would be invited to obtain the resources necessary for a great Presidio visit. The plaza (Zocalo) would be the hub for park transit and a primary trailhead to a network of 24 miles of trails and 19 miles of bikeways. The Visitor Center (Building 210) will welcome and orient guests, facilitate trip planning and introduce visitors to the Presidio and its significance.

- A revitalized Crissy Field Center and Youth Campus, located at the base of the project site, to become the regional hub for environmental literacy, youth leadership and service. The campus would provide larger and improved facilities for programs, add capacity for educator trainings, and allow community partners to take advantage of expanded collaboration while inviting a greater number of urban youth into the national park. The campus would include a historic building (Building 603) as well as adjacent construction. A "Learning Landscape" adjacent to the campus would provide a place-based experience and play environment geared primarily to children and their families and delivering high-quality, immersive environmental education experiences. The Learning Landscape would focus on the relationship between people and the land and how it has changed over time.

PARTNERS

The **Presidio Trust** is the lead agency for the New Presidio Parklands project, directing the planning, design, and construction effort and managing community outreach and engagement. The **Golden Gate Parks Conservancy**, the non-profit partner to the Trust and NPS, serves as the philanthropic and community engagement partner and supports park restoration and enhancement, education, and visitor service projects and programs. The **National Park Service, Golden Gate National Recreation Area** manages the adjacent parklands at Crissy Field and is a partner in interpretation, visitor services and programming.

The CEQ's regulations allow federal agencies such as the Trust to prepare an EA to assist agency planning and decision-making and to determine whether an environmental impact statement is required. An EA aids a federal agency's compliance with the NEPA when an EIS is not necessary, and facilitates preparing an EIS if necessary (40 CFR 1501.3).

PURPOSE AND CONTENTS OF ENVIRONMENTAL ASSESSMENT

This environmental assessment (EA) identifies the environmental effects of redeveloping two interconnected sites: 1) approximately 11 acres of new parklands atop the new Presidio Parkway tunnels; a trailhead/plaza adjacent to the future Visitor Center that encourages visitors to explore the park; a park embankment connecting the Main Post to Crissy Field; and other park amenities such as trails, overlooks, picnic grounds and parking; and 2) an expanded and renovated Crissy Field Center within a new 3-acre Youth Campus and a Learning Landscape and other park amenities. The EA uses as its baseline conditions or "no project alternative" the preferred alternative analyzed in the Doyle Drive Environmental Impact Statement/Report (EIS/R) (San Francisco County Transportation Authority, et al. 2008).[1] In presenting this baseline condition, the EA summarizes and incorporates by reference the information and analysis presented in the Doyle Drive EIS/R for construction of the Presidio Parkway cut-and-cover tunnels extending from Building 106 to east of Halleck Street, installation of required substructures and ground water conveyance systems, and backfilling over the top of the tunnel to create the approved topography for the parklands project. The EA serves as the factual support for the conclusions in the draft finding of no significant impact (FONSI) (Attachment 1). The EA/FONSI will be made available for public review for a minimum of 30 days before the Trust makes its final determination whether to prepare an EIS or to proceed with the parklands project.

Concurrently with the EA analysis, the Trust also provided for the review of the parklands project under the consultation process required by Section 106 of the NHPA following formal guidance from the Council on Environmental Quality and the Advisory Council on Historic Preservation, and in accordance with the Presidio Trust Programmatic Agreement (PTPA).[2] This process identifies the historic resources that may be affected by an undertaking, assesses the effects on historic resources through a finding of effect (FOE) (Attachment 2), and then looks for ways to "avoid, minimize, or mitigate" the effects identified in the FOE.

[1] The Doyle Drive EIS/R can be viewed at the Presidio Trust Library or on the Presidio Parkway's website at http://www.presidioparkway.org/project_docs/feis.aspx.

[2] The National Historic Preservation Act of 1966 is the principal federal law dealing with historic preservation. The procedures and terms in the PTPA, entered into with the Advisory Council on Historic Preservation, the State Historic Preservation Officer, the National Park Service, and the National Trust for Historic Preservation define how the Trust meets its statutory responsibilities under the NHPA. For more information on the NHPA, visit http://www.achp.gov/nhpp.html.

The EA is divided into four sections:

1. A brief discussion that substantiates the need for the parklands project
2. A summary of the public involvement process, a synopsis of agencies consulted, and issues raised during NHPA consultation
3. A description of the proposed project and alternatives, including those dismissed from further consideration
4. A discussion of the environmental impact of the proposed project and alternatives

2 PUBLIC PARTICIPATION AND AGENCY CONSULTATION

2 PUBLIC PARTICIPATION AND AGENCY CONSULTATION

The Trust's approach to public input for the project offered a blueprint for engaging a broad cross-section of its community, ensuring many voices are heard, and inviting participation from key public, community, business, civic and government leaders in the project design, development and environmental review process.

An EA must include a listing of the agencies contacted during preparation of the EA, including a synopsis of comments received from persons during scoping. The following describes the process used by the Trust to: 1) to encourage the participation of the public prior to preparation of the EA, and 2) consult with agencies to identify issues and seek their advice and expertise.

PUBLIC OUTREACH

The three partner agencies viewed public participation in the development of the parklands project as critical to its success, and engaged in a public process that drew feedback from across the Bay Area, the nation and the world. This public input was a key element in shaping the final concept design for the project. The outreach program offered more numerous and frequent feedback opportunities than any other Presidio planning effort to date. In particular, the Trust endeavored to have a presence in San Francisco neighborhoods that were farther away from the Presidio and to raise awareness among those who are not current users of the park. The program looked to extend a broad geographic and culturally diverse reach, providing input to the design from beyond the Presidio gates. The program was integrated with the design and environmental review process, ensuring that community engagement activities provided meaningful and timely input into the EA, and supported the best possible project design.

Public outreach for the parklands project was initiated on September 4, 2014 at a public forum that featured the release of creative visions by five renowned firms selected by the Trust to develop concept designs for the project site. From the concepts that emerged from the design firms and ideas generated by the public during this early phase of the project, the Trust and its selected design firm (James Corner Field Operations) explored and refined designs to develop the range of alternatives for environmental review. The Trust announced the beginning of public scoping pursuant to the NEPA on February 29, 2015 with the release of the Notification of Intent to Prepare an Environmental Assessment / Invitation to Participate and Comment (Trust 2015a). At a March 21, 2015 workshop, the design team consisting of Trust and James Corner Field Operations staff presented three preliminary concept designs for the new parklands, which formed the basis of the final concept design evaluated in the EA, and the two alternatives. The Trust accepted comments at a public Board of Directors meeting held on May 14, 2015 at which time the draft concept design was presented. While scoping to assist in the preparation of the EA ended on June 1, 2015, comments directed toward the new parklands were welcomed through October 8, 2015 when the final concept design was unveiled at a public Board of Directors meeting.

GOALS

Specific goals and outcomes for public outreach included:

1. A solid foundation of public knowledge around the parklands project and its goals. Raise awareness and share clear messaging about the place, the opportunity, and the process.
2. Informed design and environmental review process with clear avenues for public involvement and a high level of responsiveness and transparency. Help members of the public to participate and comment in meaningful, accessible, creative and engaging ways.
3. Broad outreach and engagement: increase inclusivity through the city. Invite everyone to the table, especially local audiences who are not yet regular Presidio users to define a shared vision for a once-in-a-lifetime project.
4. Community leadership and ownership of the parklands project. Invite community leaders (civic, business, cultural, philanthropic and educational) to explore and identify community needs and ideas through their networks to create a park vision.

APPROACH

The following strategies were implemented to ensure an inclusive, transparent and responsive public outreach process.

Public Presentations and Design Workshops

Multiple public presentations have been and will continue to be hosted at the Presidio, providing opportunities for the public to interact with the design team and learn more about the proposed project's progress. These presentations were highly interactive, with the integration of brainstorming breakout sessions geared towards generating useful public feedback on design alternatives and environmental issues. The six workshops and presentations held in 2014 and 2015 have drawn more than 1,500 attendees. These workshops continued on a regular basis through early October 2015 when the final concept design was made public and shortly before this EA was circulated.

DATE	TOPIC
September 4, 2014	Early Concepts and Vision
February 29, 2015	Programming, Places and Visitor Experience
March 21, 2015	Preliminary Concept Design and Alternatives
April 18, 2015	Key Park Layers[a]
May 14, 2015	Draft Concept Design
June 13, 2015	Learning Landscape and Educational Elements for Youth and Adults
October 8, 2015	Final Concept Design

[a]*Included views and visual resources, circulation patterns, site history, the Learning Landscape, design alternatives, and the environmental review process.*

Neighborhood Roundtable Discussions

In addition to Presidio meetings, the Trust hosted 20 interactive neighborhood roundtable discussions throughout San Francisco drawing 275 attendees. The purpose of these roundtables was to make the process open and accessible to neighborhoods and audiences throughout the city. Materials were translated into multiple languages to ensure participation from non-English-speaking residents, and outreach was conducted throughout the neighborhoods.

March 1, 2015	Chinatown YMCA	Chinatown
March 4, 2015	SPUR Urban Center	SOMA
March 5, 2015	City College of San Francisco	Balboa Park
March 7, 2015	SF Main Public Library - Latino Room	Civic Center
March 7, 2015	Black Cuisine Festival	Bayview
March 26, 2015	Chinatown YMCA	Chinatown
March 30, 2015	The Women's Building	Mission
March 31, 2015	Taraval Police Station	Sunset
April 1, 2015	SPUR Urban Center	SOMA
April 23, 2015	Ortega Library	Sunset
April 27, 2015	Chinatown YMCA	Chinatown
April 28, 2015	The Women's Building	Mission
April 29, 2015 and May 19, 2015	SPUR Urban Center	SOMA
May 20, 2015	Ortega Library	Sunset

May 27, 2015	The Women's Building	Mission
May 27, 2015	Larkspur Library	Marin County
May 28, 2015	Chinatown YMCA	Chinatown
June 16, 2015	SPUR Urban Center	SOMA

Target neighborhoods included the Mission, Civic Center, Chinatown and the Sunset. The Trust also held roundtable discussions at SPUR to hear input from the planning and design community, as well as to provide access for those located in SOMA. In addition, an exhibition at the San Francisco Main Library featuring the Presidio and the parklands project was on display from May through October 2015.

Special Interest Group Meetings and Special Events

Specialized workshops (either onsite or at other venues) are held for targeted groups who are interested in being a part of the design process. Team members facilitate discussions to provide information about the parklands project and solicit input and feedback to be included in the design process. More than 400 individuals have attended these presentations since fall of 2014. The groups included Bayview Community Leaders (BMAGIC), the Bayview YMCA, Camping at the Presidio Youth Leaders (CAP Leaders), Inspiring Young Emerging Leaders (I-YEL), UC Berkeley design students, the San Francisco Road Runners Club, and the San Francisco Travel Association.

Design Lab

The Design Lab was opened and staffed seven-days a week. It presents the latest project designs and project background. The space is organized so that the public has the opportunity to draw, debate, engage and share ideas about how the project site should be designed and what the public can do there. Approximately 8,000 individuals have visited the lab since its opening in September 2014.

Site Tours

Weekly site tours have been held since May 2014 to encourage members of the public to learn more about the project site and the parklands project. To date, the Trust has hosted 60 tours with 550 attendees.

Data Collection and Analysis

Feedback was captured at all of the engagement and input opportunities. Comments were collected in the form of emails, letters, printed comment cards, web-based surveys available on the project website[3], and interactive boards and worksheets developed for use in the galleries and during public meetings. All comments were analyzed and documented in written reports. These reports were provided to parklands project staff for consideration during the design and environmental review process, as

[3] http://newpresidioparklands.org/.

well as to inform future programming and partnership opportunities. The reports were also available to the public on the parklands project website. In June 2015, the Trust's public outreach shifted its focus towards a community leaders' strategy to identify "Parkland Champions" to advocate for the diverse San Francisco population. The Champions advised the Trust on how to reach communities that are currently underrepresented in the Presidio.

SUMMARY OF COMMUNITY ENGAGEMENT

The following tables summarize the number of individuals the Trust engaged and comments received between September 2014 and October 2015.

TYPE OF ENGAGEMENT	NUMBER ENGAGED
Project Website	30,000 Unique Visitors
Design Lab at Presidio Trust Headquarters	8,000 Visitors
Meetings, Workshops, and Presentations	2,300 Attendees
Weekly Site Tours	550 Attendees

TYPE OF COMMENT	NUMBER OF SUBMISSIONS
Comment Cards and Online Surveys	1,000 Submissions
Comments on Interactive Boards and Charts	500 Comments
IdeasFest Gallery	400 Artwork Submissions
Emails and Letters	100 Submissions

SUMMARY OF PUBLIC COMMENTS

The following is a summary of key issues and concerns that emerged during the public outreach program to date. The information gained in this effort assisted the Trust in determining the scope of the EA and in refining the proposed project design.

Views

The magnificence of the view connects with many people. Whether it is the outward view towards the Golden Gate, the bay and the city, or the inward view back to the Main Post, Parade Grounds and the Presidio Forest, the 360-degree panoramic view is the experience to cherish and enhance.

Simplicity

There is a strong desire to "keep the design simple." The design for the new parklands should fit in with the place, without clutter or overbuilding.

Diversity

The new parklands should provide a range of gathering spaces – small, medium and large, and informal indoor and outdoor - to serve a diverse range of users and groups.

Amenities

Community members mentioned the need to be family friendly and welcoming, with plentiful seating and picnic areas; active informal and affordable food options; restrooms, educational opportunities and convenient parking.

Flexibility

The energy and interest around the new parklands includes a desire for flexibility – a mix of places to quietly take in the view, to gather and assemble, and places to run, play and be active. Flexibility also means spaces that take advantage of the sun and also provide shelter from the wind.

Natural Resources

The new parklands are set within an extraordinary reserve of wild landscapes, ecological habitats and horticultural settings. Many people connected to the idea of a place that is in keeping with the character of its surroundings: simple, open and vegetated landscapes for people to explore and enjoy the surroundings.

History and Education

As a starting point for many Presidio and bayfront experiences, many envision the new parklands as a place of orientation, reflection and a meaningful experience. Some discussed the importance of recognizing the Ohlone presence on the project site and learning about the natural resources and military history of the Presidio.

Connections

Many said that it is essential to demystify the Presidio. It is confusing and connections should be clear and accessible. Reinforce visual connections, trail connections, transit connections and clarity how the new parklands connect to the rest of the Presidio and San Francisco, on foot and on public transportation.

Safety

For visitors less familiar with the Presidio, safety is a big concern. Park staffing, programs, lighting, sight lines should all be considerations.

Environmental Impacts

Many provided valuable feedback on what the design should avoid, such as structures that block views or kill birds, too much parking or too much lawn. A few individuals wished to see the Commissary removed and the Crissy Field Marsh expanded. Each of these concerns are addressed in Section 4 (Environmental Consequences) of the EA.

AGENCY REVIEW

The Trust coordinated with the following agencies for their review of the parklands project and to ensure compliance with any substantive environmental requirements, including consultation under the NHPA.

NEPA SCOPING PROCESS

As the manager of the adjacent parklands at Crissy Field and as a partner in interpretation, visitor services and programming for the Presidio at large, the National Park Service (NPS) was invited to collaborate closely on the parklands project with the Trust from the outset. In its scoping letter to the Trust (NPS 2015) (Attachment 3), the NPS acknowledged the Trust's "widespread, thoughtful public engagement and outreach" and responsiveness to the "depth of public comment and input received." The NPS letter also:

- Supported the concepts being explored for the Presidio Visitor Center design for Building 210, and for expanding the Crissy Field Center and creating the Learning Landscape.
- Requested the effects on visual resources, visitation, water resources, transportation and parking, dark night sky, and climate change adaptation be addressed in the EA (refer to Section 4 in response).
- Supported the removal of Building 211 (Observation Post) and Building 610 (Sports Basement) as soon as possible.
- Expressed concern over the potential effect on access to and parking demand in Crissy Field (Area A) due to Trust projects.
- Informed the Trust of the planning process underway for "refreshing" (i.e., repairing and improving) Crissy Field (Area A).

We applaud the Presidio Trust on the engaging, creative and exciting planning process underway for the New Presidio Parklands and we look forward to the continued collaboration on this important project. – NPS (2015)

No other Federal, State or local agencies chose to participate in the scoping process for the parklands project.

NHPA CONSULTATION PROCESS

Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires the Trust to take into account the effect of its undertakings on historic and cultural resources, including the Presidio National Historic Landmark District (NHLD). As a result of the consultation for the PTMP, the Trust entered into a Programmatic Agreement, which was updated in 2014 (Trust 2014a), with the SHPO, the ACHP and the NPS (signatory parties). The PTPA provides a framework for reviewing different types of projects, and for consulting with other parties under certain circumstances.

Consistent with the PTPA and ACHP regulations that recommend early integration of Section 106 compliance with NEPA and other agency processes, the Trust notified the PTPA parties of the undertaking and initiated consultation on the parklands project on August 29, 2014. A second consultation package was released to the PTPA parties on March 20, 2015 (following initiation of public scoping) which included a description of the preliminary concept designs for the project and the alternatives, and a proposed area of potential effect (APE). The SHPO responded via email (May 5, 2015) indicating concurrence with the proposed APE, a request for a list of contributing/non-contributing structures in the APE, clarification on the locations of the Anza Esplanade and Presidio Promenade, and additional information about the Trust's outdoor art policy. The NPS issued a comment letter on May 7, 2015, which offered some detailed design comments on each of the preliminary concepts and the alternatives, as well as recommendations on projects to consider for the cumulative effects analysis. The Trust gave serious consideration to each of the comments by modifying the concept design and focusing the EA analysis in response. The SHPO and NPS comments are provided in Attachment 3.

Following the release of the second consultation package, and leading up to the distribution of the EA, the Trust continued to provide information to the public, along with interested and PTPA parties. On September 11, 2015, the Trust released the supplemental design guidelines for signatory and concurring party review. The Trust also conducted outreach to Native American contacts that may have interest in the parklands project prior to the release of the EA. This EA is accompanied by a finding of effect (FOE) (Attachment 2), which puts forward a preliminary finding of "no adverse effect" for the undertaking, and a public review version of the supplemental design guidelines, which incorporate comments on the guidelines from earlier in October. Following the close of public comment on the EA, the Trust will circulate to all PTPA parties a summary of comments received and a request for a consultation meeting. The Trust will hold a consultation meeting with the signatory parties to seek consensus on the finding of "no adverse effect" prior to any signing of a finding of no significant impact (FONSI).

3 DESCRIPTION OF PROPOSED PROJECT AND ALTERNATIVES

JAMES
CORNER
FIELD
OPERATIONS

3 DESCRIPTION OF PROPOSED PROJECT & ALTERNATIVES

The following elements or features are based on Trust planning assumptions, management direction or policies and would be incorporated into the parklands project regardless of the alternative selected:

- The amount of fill over the tunnels would be coordinated with Caltrans based on requirements of the Vegetation Management Plan (Doyle Drive EIS/R,[4] page 2-59).
- The form of the historic bluff between the Main Parade and Crissy Field would be evoked and the physical and visual connectivity would be maximized [Doyle Drive Built Environment Treatment Plan (BETP), page 8-2].
- The visual link between the Main Post bluff as seen from Crissy Field would be restored to preserve and enhance views [BETP, page 9-15 and Doyle Drive Architectural Criteria Report (DDACR), page 28].
- The top of the bluff would meet the existing grades at the Main Parade (DDACR, page 28).
- Permanent drainage features would be installed to allow groundwater to flow easily from the northern upgradient areas, under the tunnel, toward the bay. Soil moisture on the north side of the tunnel would be similar to existing conditions (Doyle Drive EIS/R, page 3-168).
- The bluff would be used as a vegetative transition between the upper and lower post, and plantings would be low in height, low maintenance, and evoke the historic feeling of the bluff (BETP, page 9-15 and DDACR, page 28).
- All areas affected by construction activities would be re-vegetated following agreed-upon design guidelines to their native or appropriate ornamental vegetation in designed landscaped areas (Doyle Drive EIS/R, page K-12).
- The Presidio Promenade would be incorporated into the project design and several pedestrian connections from the Main Post to Crissy Field would be provided with at least one accessible route (BETP, page 9-15 and DDACR, page 28).

The CEQ NEPA Regulations require that an EA briefly describe the proposed project's features. This section provides a description of the proposed project and the alternatives, including features common to all alternatives, the "no-project alternative" and those that have been eliminated from further study.

[4] The expected minimum depth to support native vegetation is approximately four feet at the crest of the tunnels.

- Building 210 would be rehabilitated as the Visitor Center in a separate action and Building 215 (Transit Center) would be retained.
- Building 201 would be returned to the site of the original building following completion of roadway construction activities and rehabilitated as part of the Presidio Parkway project (Doyle Drive EIS/R, pages 3-23 and 3-148).
- The project design would respect existing constraints, including loading and structural limitations over the tunnel. Cut and fill on the bluff would be balanced in order to reduce the need to import soils while maximizing space for overlooks and sculpting the bluff.

ALTERNATIVE 1 – PRESIDIO TRUST MANAGEMENT PLAN UPDATE

The PTMP Update Alternative is the baseline or "no-project alternative" that was evaluated in the Doyle Drive EIS/R and anticipated in the 2002 PTMP and 2010 Main Post Update to the PTMP (Figure 3).

- The PTMP Update Alternative would be an open, largely undifferentiated landscape that is planted primarily with native vegetation with lawns surrounding the buildings. The project site would accommodate individuals and small groups.
- Paths would provide pedestrian north/south and east/west access.
- The Crissy Field Center (Building 603) would remain unchanged and the surrounding landscape would be largely native plants.
- The Observation Post (Building 211) would be reused for office space.
- Building 201 would be moved to its permanent location on the west side of Halleck Street and rehabilitated by the Presidio Parkway project. Building 210 would be rehabilitated as the new Visitor Center under a separate Trust action. Building 215 would remain as the Transit Center.

Key elements: Paths, expanse of native plantings, 35,573 square feet of building space, and 124 parking spaces.

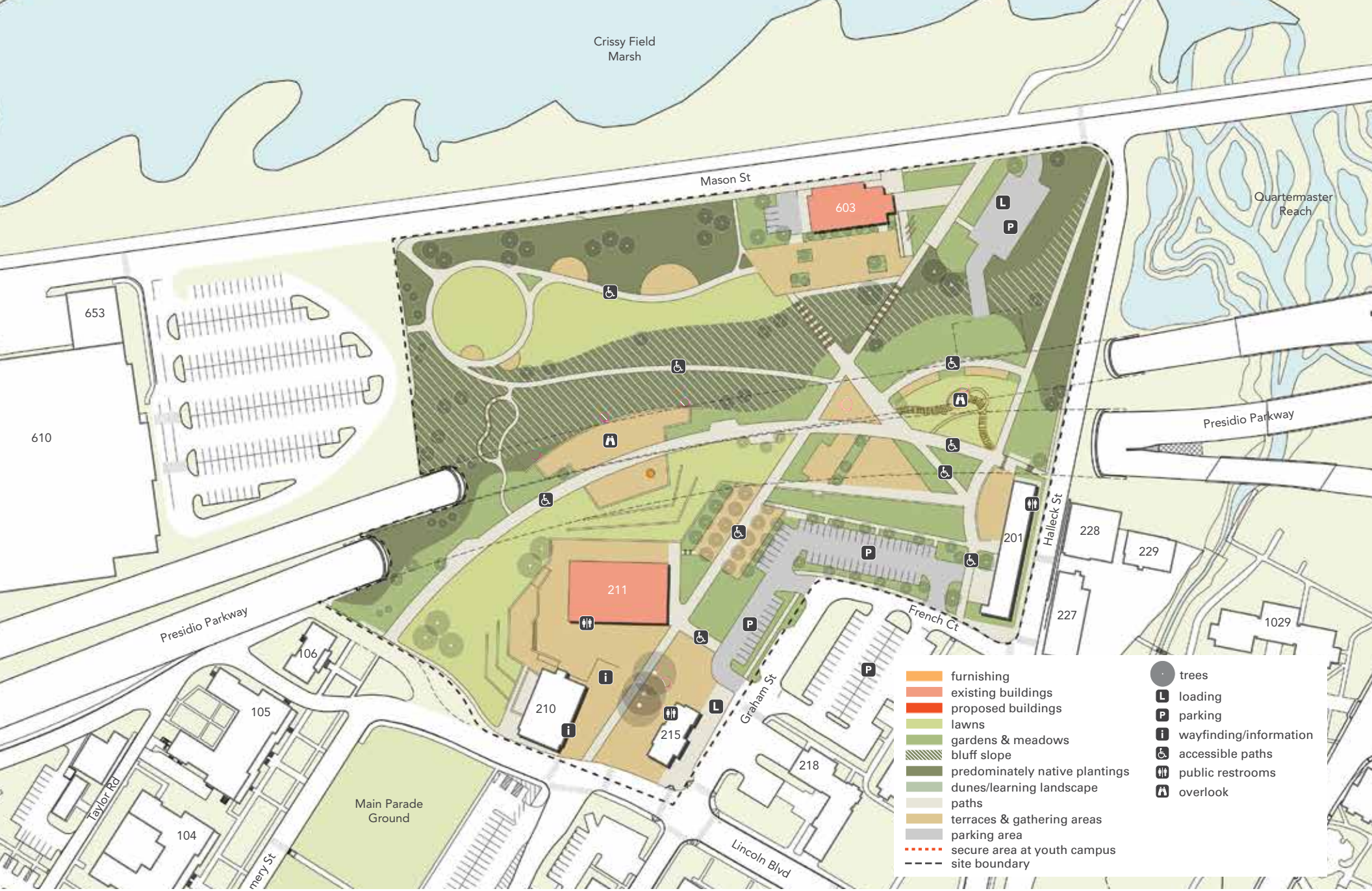

Crissy Field Marsh
Mason St
Quartermaster Reach
Presidio Parkway
Halleck St
French Ct
Graham St
Lincoln Blvd
Taylor Rd
Main Parade Ground
603
653
610
211
210
215
201
228
229
227
1029
218
106
105
104
furnishing
existing buildings
proposed buildings
lawns
gardens & meadows
bluff slope
predominately native plantings
dunes/learning landscape
paths
terraces & gathering areas
parking area
secure area at youth campus
site boundary
trees
loading
parking
wayfinding/information
accessible paths
public restrooms
overlook

ALTERNATIVE 2 – PRESIDIO PARKWAY

Building on the analysis contained in the Doyle Drive EIS/R, the Presidio Parkway Alternative responds to the Doyle Drive Built Environment Treatment Plan (San Francisco County Transportation Authority, et al. 2009) and is consistent with the Doyle Drive Architectural Criteria Report (Caltrans District 4 2008) (Figure 4).

- The Presidio Parkway Alternative would be an open and diverse landscape with differentiated areas that accommodate individuals, families, and groups of different sizes. The focal point of the alternative would be a large, civic promontory that accommodates larger groups for events and programs as well as informal gatherings. There would be a range of opportunities for interpretation and learning.
- A variety of paths would provide east/west and north/south access as well as different ways to traverse and scale the bluff.
- The Observation Post (Building 211) would be retained for special events and public uses.
- Building 201 would be moved to its permanent location on the west side of Halleck Street and rehabilitated by the Presidio Parkway project. Building 210 would be rehabilitated as the new Visitor Center under a separate Trust action. Building 215 would remain the Transit Center.
- The Crissy Field Center (Building 603) would be retained for youth programming and the adjacent landscape would be largely native plants and lawn used for recreation and other purposes.

Key elements: Gardens, lawns, and native plantings; visitor-serving plaza, central promontory with group fire pit, and areas to gather and sit; areas for programming; 35,573 square feet of building space; and 87 parking spaces.


Crissy Field Marsh
Mason St
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Presidio Parkway
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Halleck St
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Main Parade Ground
Lincoln Blvd
furnishing
existing buildings
proposed buildings
lawns
gardens & meadows
bluff slope
predominately native plantings
dunes/learning landscape
paths
terraces & gathering areas
parking area
secure area at youth campus
site boundary
trees
loading
parking
wayfinding/information
accessible paths
public restrooms
overlook

ALTERNATIVE 3 (PROPOSED PROJECT) – NEW PRESIDIO PARKLANDS

"The Concept Design outlines the primary framework for the New Presidio Parklands: the routes, pathways, spaces and landscape settings are all choreographed to dramatically leverage the experience of being out 'above the tunnels' in the space of the bay." – James Corner Field Operations (2015a)

The New Presidio Parklands Alternative is the "preferred alternative" developed by James Corner Field Operations (JCFO) in partnership with the New Presidio Parklands project team. The proposed project emerged from JCFO's competition-winning design and subsequent public input (Figure 5). A complete description of the proposed project is available in the Concept Design documents (JCFO 2015a, 2015b).

- The New Presidio Parklands Alternative would support a range of group sizes as well as programs and experiences, from individual pursuits and small gatherings to programs, in diverse landscapes and settings.
- The Anza Esplanade would be extended to connect the Main Post to a Central Overlook, a central viewing and gathering point.
- The Observation Post (Building 211) would be demolished and replaced with the approximately 9,300 square-foot New Observation Post. The new building is conceived as an indoor-outdoor space ideal for shelter, programs, and events.
- A new plaza (Zocalo) would function as a main social and multi-functional arrival and gathering plaza between the Transit Center and the Visitor Center.
- A Cliff Walk would follow the edge of the embankment and connect visitors to the wider landscape.
- Three overlooks would be designed with simple walls, resembling both the historic batteries along the coast and recently constructed overlooks in the Presidio.
- A Terraced Amphitheater stepping down from the Central Overlook would offer extraordinary bridge views, provide space for gathering, orientation, interpretation, and programming, and connect the Central Overlook to the landscape below.
- A fully accessible Bluff Walk would traverse the embankment and connect the bluff top to Mason Street and the Learning Landscape. Stairs near the West Overlook would also connect down to the Learning Landscape.
- The Learning Landscape, which would include a renovated Crissy Field Center, new Field Station and Classroom buildings to house additional program space. The new buildings would not exceed 7,500 square feet in total and no single building would exceed 5,800 square feet.

5 ALTERNATIVE 3 (PROPOSED PROJECT) — NEW PRESIDIO PARKLANDS

Key elements: Lawns, gardens and meadows; pathways for strolling; nooks for seating and small gatherings; three overlooks; a central interpretive feature; 43,073 square feet of building space; and 53 parking spaces.

A comparison of the alternatives is provided in Table 1.

ALTERNATIVES CONSIDERED BUT REJECTED

EXPAND CRISSY FIELD MARSH ALTERNATIVE

This alternative was eliminated from further study because marsh expansion in the project site would severely limit the area available for educational uses associated with the Crissy Field Center and Learning Landscape. Expanding these facilities so that the number of youth educated on the project site can be increased from approximately 23,000 per year to 50,000-60,000 per year is a key goal of the proposed project, which supports a broader Trust goal of serving every child in San Francisco. Reaching these goals requires new educational facilities and outdoor learning environments that fill the entire project site.

Furthermore, this alternative would neither substantially improve the health nor ensure the long-term ecological viability of the marsh. As noted in the Crissy Field Marsh Expansion Study (Philip Williams & Associates, Ltd. 2004):

> *Future expansions to the existing marsh should include enlarging the area near the flood shoal in a radial direction so that increases in its current footprint would not reduce tidal circulation by "pinching" off the southeast portion of the lagoon near the footbridge. Circulation in this area is of particular concern due to the 72-inch outfall that discharges stormwater into the lagoon. Poor circulation could reduce the effective tidal prism as well as worsen water quality in areas of the lagoon where tidal exchange is low. Marsh expansion near the flood shoal would tend to mitigate these effects.*

Marsh expansion in this area could also have adverse effects on other resources. Major grading would be required in an area of predicted prehistoric archaeological sensitivity for buried deposits representative of seasonal collecting activities along the margins of the San Francisco Bay and its estuary. Excavation in the area would increase the possibility of encountering native soils with the potential for disturbing archaeological resources, affecting their physical integrity. In addition, excavation could pose a risk to human health or the environment as the area is within the Commissary/PX land use control (LUC) zone, which prohibits use as a "saltwater ecological habitat area or ecological special status habitat area." Additional remediation measures would be required to mitigate the potential for exposure to contaminants.

ITEM	QTY UNIT	LEGEND KEY	ALTERNATIVES		
			Alternative 1	Alternative 2	Alternative 3
			PTMP Update	Presidio Parkway	New Presidio Parklands
Total Built Space			35,573	35,573	43,073
Existing Buildings [1]	Gross Square Feet		*35,573*	*35,573*	*35,573*
Demolition		*N/A*	*0*	*0*	*-9,294*
New Building(s) - Youth Campus [2]			*0*	*0*	*7,500*
New Building(s) - New Observation Post			*0*	*0*	*9,294*
Total Gathering Areas			3.4	7.0	5.5
Hardscape [3]	Acres		*2.5*	*4.9*	*4.2*
Lawns			*0.9*	*2.1*	*1.3*
Gardens	Acres		0.6	2.1	2.3
Predominently Native Plantings [4]	Acres		7.7	3.5	4.3
Learning Landscape [5]	Acres		0.0	0.0	0.6
Paths [6]	Linear Feet		8,252	8,815	11,472
Overlooks	Number		0	2	3
Parking Spaces	Number	P	124	87	53

[1] Includes Buildings 201, 210, 211, 215 and 603.

[2] Includes the new Field station and Classroom buildings adjacent to Building 603 (no single building would exceed 5,800 GSF).

[3] Includes all paved area (plazas, terraces, overlooks and paths), permeable paved areas (decomposed granite), and excludes Learning Landscape.

[4] Includes bluff slope and native plantings in the Learning Landscape area.

[5] Includes all hardscape and paths within Learning Landscape, and excludes native plantings.

[6] Includes new sidewalks along Mason, Lincoln, French Court and Graham.

REMOVE COMMISSARY (BUILDING 610) ALTERNATIVE

This alternative was eliminated from further consideration because it is beyond the scope of the project. The Trust intends to complete a design for the project site before initiating planning for the future of the Commissary site so that it can be informed and shaped by the vision for the proposed project. This sequence was strongly encouraged by members of the public as well as agency partners at the conclusion of the request for proposals for a cultural facility at the former Commissary site (Trust 2013a). Proceeding with the proposed project would not limit this alternative in the future.

4 ENVIRONMENTAL CONSEQUENCES

1925 birds eye view showing project site.
GOLDEN GATE NRA, PARK ARCHIVES

4 ENVIRONMENTAL CONSEQUENCES

This section provides a discussion of the environmental impacts of the proposed project and alternatives. The discussion focuses on issues and concerns raised during scoping for which information is provided. For each resource, current conditions are first described, followed by a separate discussion of impacts, and concluding with a significance determination. Throughout the discussion, the 14-acre site is referred to as the "project site", and the impact zone surrounding the project site is the "project area." The section begins with a list of mitigation measures including those adopted from the Doyle Drive EIS/R and PTMP EIS that the Trust will commit to during the course of the parklands project.

MITIGATION COMMITMENTS

Doyle Drive EIS/R Mitigation Commitments

The Trust commits to maintain the ongoing coordination with the project's partners that was fostered by Caltrans for the Presidio Parkway project. The following avoidance, minimization, and/or mitigation measures were adapted from the Doyle Drive EIS/R and ROD. These measures include but are not limited to elements which would be designed into the parklands project, continued coordination with affected parties, and implementation of best management practices during construction. The Doyle Drive EIS/R, along with its appendices and all associated technical reports prepared for the Presidio Parkway project, are incorporated by reference into this EA.[5]

Cultural Resources

- The Presidio Parkway Project Proponent and the Trust will rehabilitate buildings and restore cultural landscape features consistent with applicable treatment plans and guidelines to avoid an adverse effect to the National Historic Landmark District (NHLD) (Doyle Drive ROD, page A-4).

Archaeological Resources

- The Presidio Parkway Project Proponent and the Trust will follow Trust protocols for archaeological monitoring and for the treatment of archaeological resources and collections management and curation of recovered materials (Doyle Drive EIS/R, page K-13; Doyle Drive ROD, page A-4).

Visual Resources

- The Presidio Parkway Project Proponent and/or the Trust will re-vegetate all disturbed areas as soon as practicable with native or appropriate ornamental vegetation. Revegetation and restoration will

[5] The Doyle Drive EIS/R is available for review at http://www.presidioparkway.org/project_docs/feis.aspx.

be completed in accordance with the Vegetation Management Plan (VMP) (Trust and NPS 2001) and standard Trust restoration practices. Vegetation maintenance will include replacing plants, maintaining erosion control materials and irrigation systems, controlling weeds, and removing trash and other debris. Plants will be checked for disease and pests (Doyle Drive EIS/R, page K-17; Doyle Drive ROD, page A-3).

Biological Resources

- The Trust will restore vegetation removed as a result of project construction activities in accordance with the 2001 VMP and standard Trust restoration practices and manage the revegetated areas (Doyle Drive ROD, page A-11).
- The Presidio Parkway Project Proponent and the Trust will design lighting to minimize fugitive light outside the boundaries of the project (Doyle Drive ROD, page A-13).
- The Presidio Parkway Project Proponent and the Trust will not use species listed as noxious weeds for erosion control and landscaping included in the construction of the project. Precautions may include: inspecting and cleaning construction equipment; implementing eradication strategies should an invasion occur; and discouraging colonization of invasive, non-native species by stabilizing disturbed soil areas affected by construction areas as soon as they are completed (Doyle Drive EIS/R, page K-11; Doyle Drive ROD, page A-14).

Water Resources

- The Presidio Parkway Project Proponent and Trust Contractors will implement Stormwater Pollution Prevention Programs (SWPPPs) and follow Best Management Practices (BMPs) to reduce pollutants in stormwater discharges and potential for erosion and sedimentation during construction. Control measures could include construction of detention structures, installation of siltation fencing, appropriate grading practices, dust control, soil stabilization and temporary seeding (Doyle Drive EIS/R, page 3-177, Doyle Drive ROD, page A-5).
- The Presidio Parkway Project Proponent and Trust will incorporate flood protection features into project plans in low-lying portions of the project site that may be subject to rare flooding events (Doyle Drive ROD, page A-5).
- The Presidio Parkway Project Proponent and Trust will ensure that project plans contain measures to preserve surface and near-surface hydrology based on results of a hydrologic investigation (Doyle Drive ROD, page A-5).

Utilities

- The Presidio Parkway Project Proponent will relocate all utilities affected by the Presidio Parkway project to provide the same level of service as the existing systems (Doyle Drive EIS/R, page 3-52). The Presidio Parkway Project Proponent and Trust will coordinate with the various utility providers regarding temporary and permanent utility relocations to minimize potential disruption of utility service during project construction (Doyle Drive ROD, page A-1).

Hazardous Substances

- The Presidio Parkway Project Proponent and Trust will incorporate into the project the replacement of any engineering site controls required by the lead regulatory agency as a condition of site closure if soil is excavated within a site previously remediated by the Trust in accordance with a remedy approved by the lead regulatory agency (Doyle Drive EIS/R, pages 3-192 and K-7).

Air Quality

- The Presidio Parkway Project Proponent and Trust Contractors will mitigate potential nuisance-type impacts by implementing BAAQMD's basic dust control procedures identified in the most recent BAAQMD Guidelines, and will maintain project construction-related impacts at acceptable levels (Doyle Drive EIS/R, page 3-202; Doyle Drive ROD, page A-9).

- The Presidio Parkway Project Proponent and Trust Contractors will use control technologies on construction equipment to reduce PM and NOx emissions per EPA Tier 4 emission standards (Doyle Drive EIS/R, page K-11; Doyle Drive ROD, page A-9).

Noise

- The Presidio Parkway Project Proponent and Trust Contractors will adhere to applicable noise control specifications and implement appropriate avoidance and noise reduction measures to limit the temporary noise increase resulting from construction noise impacts (Doyle Drive EIS/R, page K-6, Doyle Drive ROD, page A-9).

PTMP ROD & MAIN POST UPDATE ROD MITIGATION COMMITMENTS

The Trust will implement, as necessary, the following mitigation measures identified in the PTMP Record of Decision (ROD) (Trust 2002b) and the Main Post Update ROD (Trust 2011a) to minimize or avoid environmental impacts that could result from implementation of the proposed project or alternatives. The mitigation measures are discussed in more detail within the impact discussion that follows. For measures that fall outside the jurisdiction of the Trust, the Trust will assist and encourage other agencies to implement the measures, and will monitor their performance.

Transportation

- The Trust will provide bicycle and pedestrian amenities such as shelters, benches, water fountains, secure bicycle racks, route lighting, and other facilities to encourage travel by foot and bicycle (TR-9 *Pedestrian/Bicycle Amenities*, PTMP ROD, page 19).

- The Trust will encourage Muni to increase frequency of service on existing Muni lines as warranted. Increased frequency on existing Muni lines with or without any extensions of these lines would increase the transit peak hour capacity, and consequently reduce passenger load factors on these lines (TR-10 *Support Increased Muni Frequencies*, PTMP ROD, page 19).

- The Trust will signalize the Lincoln Boulevard/Girard Road intersection when needed (i.e., after implementing additional TDM measures and prior to the intersection operations deteriorating to LOS E or F). This intersection was recently reconstructed as part of the Presidio Parkway project with a southbound left-turn pocket and westbound right-turn pocket to provide additional capacity without signalizing the intersection. If weekend peak hour volumes are greater than weekday PM peak hour volumes, the additional turn lanes may not adequately improve the level of service to LOS D or better in the future. Additional measures such as event-specific bus service and/or traffic control officers may be needed during unusually large special events (TR-20 *Lincoln Boulevard/Girard Road Intersection Improvements*, PTMP ROD, page 22).

- The Trust will encourage the NPS to implement parking regulations, time limits, and/or parking fees in Area A (notably, Crissy Field) to reduce impacts of fee parking in Area B. The Trust will provide assistance to the NPS to ensure coordination and consistency of parking management within both Areas A and B. Should the NPS choose not to adopt or enforce this measure, or is otherwise opposed to it, implementation of parking management control in Area B would affect parking for Crissy Field (Area A) (TR-21 *Presidio-Wide Parking Management*, PTMP ROD, page 23).

- The Trust will periodically monitor implementation and effectiveness of its Transportation Demand Management (TDM) program to reduce automobile usage by all tenants, occupants and visitors (see Appendix D of the PTMP for full description). If the TDM performance standards as described in the PTMP are not being reached, the Trust will implement more aggressive TDM strategies or intensify components of the existing TDM program such as requiring tenant participation in more TDM program elements, and more frequent and/or extensive shuttle service (TR-22 *TDM Program Monitoring*, PTMP ROD, page 23).

- The Trust will continue to implement parking management strategies during park-sponsored activities and special events to discourage single-occupant automobile usage, encourage alternative modes of

travel, and maximize use of available parking resources. Special events that could result in overflow parking will be coordinated and scheduled with the NPS based on parking availability. Events requiring large amounts of parking will not be scheduled concurrently with other events or Presidio peak parking demand periods if combined parking demand would exceed the available supply. Sponsors may be required to provide special transit, taxi and bicycle services during their events to reduce expected parking demand and promote use of public transit, biking, walking and remote parking lots (TR-24 *Special Event Parking Management*, PTMP ROD, page 24).

- The Trust will continue to monitor Muni operations and passenger loads within the Presidio. Continued monitoring of Muni service in the Presidio, and similar monitoring of Golden Gate Transit service at the Presidio would indicate any capacity problems, particularly on northbound Golden Gate Transit bus service during the PM peak hour. If the monitoring were to reveal insufficient capacity for northbound Presidio-generated passengers during the PM peak hour, potential improvements will be coordinated with the Golden Gate Bridge, Highway and Transportation District (TR-25 *Transit Service Monitoring Program*, PTMP ROD, page 24).

- The Trust Contractor will develop a construction traffic management plan, which will include information on construction phases and duration, scheduling, proposed haul routes, permit parking, staging area management, visitor safety, detour routes, and pedestrian movements on adjacent routes. The plan will be reviewed with consideration of other individual projects in the Main Post as well as Presidio Parkway construction (TR-26 *Construction Traffic Management Plan*, PTMP ROD, page 24).

- The Trust will signalize the Lincoln Boulevard/Girard Road intersection when needed (i.e., after implementing additional TDM measures and prior to the intersection operations deteriorating to LOS E or F) (TR-28 *Lincoln Boulevard/Graham Street Intersection Improvements*, Main Post Update ROD, page A-2).

- The Trust will signalize the Lincoln Boulevard/Halleck Street intersection when needed (i.e., after implementing additional TDM measures and prior to the intersection operations deteriorating to LOS E or F) (TR-29 *Lincoln Boulevard/Halleck Street Intersection Improvements*, Main Post Update ROD, page A-2).

Biological Resources

- The Trust will implement the following measures as warranted to protect wildlife and native plant communities:
  - Schedule heavy equipment use, to the greatest extent feasible, to avoid areas where soils are wet and prone to compaction;
  - Implement non-native wildlife control measures;
  - Provide signage and/or other educational devices to encourage voluntary compliance with protection measures;
  - Prevent unnecessary vehicular and human intrusion and use into native and sensitive habitat communities from adjacent construction, demolition and intensive special events and recreation activities;
  - Prohibit the use of erosion control measures and mulches that contain non-native plant seeds;
  - Prohibit the use of irrigation, fertilizers, and herbicides in areas adjacent to, or up-gradient from sensitive biologic resources; and
  - Prepare interpretive materials and signage in areas of increased use adjacent to natural habitat areas and sensitive native plant communities (NR-5 *Wildlife and Native Plant Communities*, PTMP ROD, page 7).
- The Trust will implement the following measures to reduce the effects on wildlife and wildlife habitat:
  - A qualified wildlife biologist will conduct a site visit during project planning and assess the potential for any sensitive wildlife species, including bats, or their habitat to occur on or adjacent to the project site. If sensitive animal species are found, the project will be redesigned or project timeline modified in accordance with the biologist's recommendations to avoid impacts. If avoidance is not feasible, species-specific and site-specific mitigation plans will be developed, and regulatory agency consultation pursued (if needed) to mitigate direct take and replace habitat for the impacted species; and
  - Any vegetation removal will follow the park guidelines for protection of nesting birds. This includes guidelines on timing of vegetation and removal (NR-9 *Wildlife and Wildlife Habitat*, PTMP ROD, page 9).

Visitation

- The Trust will require appropriate permit conditions for special events to ensure that park resources are protected (CO-7 *Special Events*, PTMP ROD, page 15).

Water Resources

- The Trust will implement Best Management Practices (BMPs) that encourage water conservation. Given the evolutionary nature of water conservation measures, the Trust will make provisions for the removal or addition of BMPs as the technical and economic reasonableness of measures are determined (UT-1 *Demand Management Best Management Practices*, PTMP ROD, page 25).

- The Trust will implement designs or measures to limit or eliminate impervious surfaces in order to reduce stormwater runoff volumes and improve water quality. The Trust will practice natural stormwater reduction by using on-site vegetation and landscaping as a filtration and retention system to the extent feasible. Projects will be reviewed to determine if stormwater flows could be limited through reduction of impervious surfaces and addition of porous surfaces (UT-7 *Stormwater Reduction*, PTMP ROD, page 28).

NEW PRESIDIO PARKLANDS EA MITIGATION COMMITMENTS

The Trust will apply the following mitigation measures informed by the EA review process, which will further minimize potential impacts from implementation of the proposed project or alternatives:

Transportation

- The Trust will consider making the Mason Street/Halleck Street intersection side-street stop-controlled when needed (i.e., after implementing any additional TDM measures to address other study intersections). Removing stop control on the Mason Street approaches and making the intersection a side street stop-controlled intersection would improve the operation for the Mason Street approaches, but delay would increase for the Halleck Street approach. Removing stop control on the Mason Street approaches would also negatively affect the pedestrian crossing at this intersection.

Visitation

- The Trust will limit special event capacity to avoid overcrowded conditions and to protect resources, and will require appropriate permit conditions for special events to ensure that supportable capacity levels will not be exceeded.

- The Trust will coordinate management actions and protection measures in Area B with the NPS to control visitation.

Light and Glare

- The Trust will review both the interior and exterior lighting designs to ensure consistency with PTMP policies regarding light and with guiding principles set forth in the Trust's standard measures for lighting.

Biological Resources

- The Trust will pursue best bird-safe construction practices for new buildings to reduce potential effects related to bird strikes and minimize the potential for adverse nighttime lighting effects on local or migratory wildlife.

Water Resources

- The Trust will implement applicable provisions for water management practices and water waste prevention established in the State's Model Water Efficient Landscape Ordinance.

Environmental Sustainability and Climate Preparedness

- The Trust will adopt site-specific strategies identified in the EA to realize sustainability goals of the Trust's Climate Action Agenda and make the new parklands resilient in the face of climatic extreme.

CONSISTENCY WITH LAND USE PLANS AND POLICIES

The NEPA requires an EA to discuss possible conflicts with the objectives of land use plans, policies, and controls for the area concerned.

The project site is located on the Main Post and in the Crissy Field district in Area B of the Presidio, which is under the exclusive jurisdiction of the Presidio Trust, a federal agency. The consideration of planning principles and policies is carried out as an integral part of the Trust's weighing of environmental and non-environmental factors in reaching a rational and balanced decision. The discussion of land use policy conflicts will be relied upon in the finding of no significant impact (Attachment 1) and used by the Trust's Board of Directors as part of their decision whether to approve or disapprove the proposed project. Under the NEPA, however, the Trust has the authority to move forward with the proposed project, despite any possible policy conflict. Any potential conflicts with existing plans and policies that relate to physical environmental issues (such as increasing traffic) are evaluated as part of the impacts analyses elsewhere in Section 4 of the EA. The Doyle Drive EIS/R did not identify any conflicts between the new parklands and Presidio-wide land use and development goals.

Would any of the proposed alternatives be inconsistent with plans and policies that govern the project area?

PRESIDIO TRUST MANAGEMENT PLAN

The 2002 Presidio Trust Management Plan (PTMP) (Trust 2002a) is the Trust's formally adopted statement of land use policy. The PTMP provides an interrelated set of planning principles and policies, which taken together provide the framework for the Trust's decision-making and actions. Guidelines for the Main Post, since amended (see below), include a call for incorporating an open space connection between the Main Post and Crissy Field as part of the planning for reconstruction of Doyle Drive, and improved pedestrian and visual connections between the two areas (page 68). The guidelines for the Crissy Field district also include the need to explore options for safe and inviting open space connections between central Crissy Field and the Main Parade at the Main Post as part of Doyle Drive reconstruction (page 77). The approximately 7,500 square feet (sf) of new construction at the Crissy Field Center under Alternative 3 to enhance the function of Building 603 as encouraged by the PTMP would be accommodated within the maximum permitted (up to 70,000 sf) for the Crissy Field (Area B) district.

The PTMP committed the Trust to work collaboratively on the Crissy Field Marsh Expansion Study ("Marsh Study") (Philip Williams & Associates, Ltd. 2004). The goal of the Marsh Study was to identify a broad array of options that would ensure the long-term ecological viability of Crissy Field Marsh. The project reduces the area into which Crissy Field Marsh could expand to the east of the Commissary and west of the Crissy Field Center. While this area was an option for future marsh expansion in the Marsh Study as part of the historic marsh footprint, the study found that expansion in this area is less critical for ensuring the health of the marsh compared to the area near the flood shoal in the east portion of the marsh.[6]

MAIN POST UPDATE TO THE PTMP

The 2010 Main Post Update (MPU) to the PTMP (Trust 2010a) amends the Main Post chapter (pages 62-69) of the PTMP and outlines implementation strategies keyed to the PTMP guidelines, each of which is numbered. The MPU acknowledges that the open bluff along the Main Post's northern edge offers spectacular views of San Francisco Bay and the land features beyond, and calls for retaining and enhancing those views (Guideline G11, page 28). The demolition of Building 211 (9,294 sf) and replacement with new construction of the New Observation Post on the bluff top (9,294 sf) is within the maximum amount of building demolition (94,000 sf) and new construction (146,500 sf) identified in the MPU (Table 1, page 17).

[6] "Future expansions to the existing marsh should include enlarging the area near the flood shoal in a radial direction so that increases in its current footprint would not reduce tidal circulation by "pinching" off the southeast portion of the lagoon near the footbridge. Circulation in this area is of particular concern due to the 72-inch outfall that discharges stormwater into the lagoon" (Crissy Field Marsh Expansion Study, page 3).

PRESIDIO TRAILS AND BIKEWAYS MASTER PLAN

The 2003 Presidio Trails and Bikeways Master Plan (Trust and NPS 2003) established a comprehensive trails and bikeways network in the Presidio. The parklands project would advance the goals of the plan by enhancing the public's exploration and experience of the Presidio and by improving connections between key features of the Presidio, notably through the Anza Esplanade and the Presidio Promenade.

PRESIDIO OF SAN FRANCISCO VEGETATION MANAGEMENT PLAN

The 2001 Vegetation Management Plan (VMP) (Trust and NPS 2001) provides a management framework for rehabilitating and restoring the native plant and landscaped areas of the Presidio, and also guides the actions affecting the Presidio's vegetation resources. The VMP divides vegetation resources into three zones: native plant communities, historic forest, and landscape vegetation. The project site falls fully within the landscape vegetation zone. Consistent with the primary objectives of the VMP, the parklands project would increase and restore open space in the Presidio. New landscaping elements would be sited and designed to be in keeping with the historic character-defining elements of the National Historic Landmark District.

CRISSY FIELD PLAN

The 1996 Crissy Field Plan (NPS 1996) calls for the cultural and ecological restoration of the 100-acre site "consistent with the National Park Service mission of conservation, while maintaining and enhancing Crissy Field as a 'people place', which welcomes a variety of recreational activities" (page 1-2). Restoring the Main Post bluff for recreation and visitor enjoyment while rehabilitating and preserving important historic resources and integrating natural values is consistent with the overall goal of the plan. The parklands project would enhance opportunities for Crissy Field visitors through providing facilities (restrooms, picnic tables, benches, wayside exhibits), a direct connection from the Main Post, access to accommodate people with physical disabilities, parking improvements and other site amenities.

SAN FRANCISCO BAY PLAN

The San Francisco Bay Plan (BCDC 1968), adopted by the San Francisco Bay Conservation and Development Commission in 1968 and amended periodically since then, includes policies to guide future uses of the bay and shoreline and a set of maps which show where the policies should apply to the present bay and shoreline. The plan designates the Presidio as a waterfront park,[7] beach priority use area in the San Francisco Bay Plan Map 4, Central Bay North. Plan Map 4 is accompanied by map

[7] However, in accordance with the Coastal Zone Management Act, the entire Presidio of San Francisco is excluded from the coastal zone. "Excluded from the coastal zone are lands the use of which is by law subject solely to the discretion of or which is held in trust by the Federal Government, its officers or agents." Coastal Zone Management Act § 304, 16 U.S.C. § 1453(1).

notes, which are advisory and are not enforceable policies. The notes specifically state that areas within the jurisdiction of the Presidio Trust (Area B) should be developed as called for in the Trust's general management plan (i.e., PTMP), and that alterations to Doyle Drive should preserve recreation opportunities within the waterfront park priority use area and preserve existing natural and cultural values or their restoration potential (page 116).

The BCDC reviews federal activities to assess their consistency with the Commission's Amended Management Program for San Francisco Bay. In 2002, the BCDC found that, as part of the Trust's consistency determination for the PTMP, future development to "enhance and maintain visual and physical (e.g., paths and bike trails) connections to Crissy Field" from the Main Post (Alternative 1), if consistent with a BCDC-reviewed Presidio Trails and Bikeways Master Plan,[8] would ensure that the public access proposed is also consistent with the Commission's laws and policies and need not return to the Commission for further consistency review (BCDC 2002). Nonetheless, in 2009, Caltrans submitted the Presidio Parkway project, including the Main Post tunnel with landscaping above the tunnel (Alternative 2), to the Commission for a consistency determination, for which the Commission agreed that the project is consistent with the Commission's Amended Management Program for San Francisco Bay. The BCDC concurred that the project would provide an opportunity to develop a new public park area above the tunnel, which would provide a direct pedestrian connection from the Main Post to Crissy Field (BCDC 2009). Alternative 3 includes detailed plans to implement the work envisioned in the PTMP, the Presidio Trails and Bikeways Master Plan, and the Doyle Drive EIS/R as authorized by the Commission. No conflicts with the San Francisco Bay Plan, Amended Management Program for San Francisco Bay, or BCDC policies have been identified. As a result, the proposed project is fully consistent with BCDC's enforceable policies.

CONCLUSION

No inconsistencies exist between the proposed project and land use plans, policies and related regulatory requirements for the area concerned. The state's (i.e., BCDC's public access) interests have been accommodated through the proposed project's consistency with the Trust's own land use controls and the proposed project is fully consistent with BCDC's enforceable policies. Building removal and new construction would be within the parameters for both building demolition and new construction set in the PTMP and MPU.

[8] The BCDC found the Trails Plan to be consistent with its existing policies in 2003 (BCDC 2003).

TRANSPORTATION

GATEWAY TRAFFIC

Table 2 summarizes changes in weekday PM peak hour gateway volumes in recent years. Construction of the Presidio Parkway has significantly affected traffic patterns within and near the Presidio, as reflected in the counts collected in September 2014. The ramps between Highway 1 and US 101 were closed from early 2010 to July 2015, resulting in an increase in volumes at the Golden Gate Bridge Plaza area. Direct access to the Presidio via the Girard Road interchange was opened in July 2015.

Although regional traffic volumes are typically greatest in the weekday peak commute hour, weekend peak hour traffic volumes are slightly greater than weekday peak hour volumes at some Presidio gates. This difference is most pronounced at the Golden Gate Bridge and popular routes through the Presidio to and from the Golden Gate Bridge. The PTMP EIS predicted a total weekday PM peak hour gate volume of 9,952 vehicles per hour at buildout, and anticipated the new Presidio Parkway interchange at Girard Road to accommodate approximately 9 percent of that peak hour volume. Peak hour gateway volumes in September 2014 were 7,012 vehicles per hour in the weekday PM peak hour and 7,362 vehicles per hour in the weekend peak hour, respectively.

INTERSECTION ANALYSIS

Five intersections were identified for study in the transportation analysis. These intersections are in close proximity to and on key access routes to the project site, and consequently are those that would be most affected by increased traffic traveling to and from the project site. The intersections are primarily a subset of intersections analyzed as part of the PTMP EIS and Main Post Update EIS. Other intersections previously studied as part of other environmental studies will continue to be monitored. The study intersections are:

1. Mason Street/Marina Boulevard/Lyon Street
2. Lincoln Boulevard/Graham Street
3. Lincoln Boulevard/Halleck Street
4. Lincoln Boulevard/Girard Road
5. Mason Street/Halleck Street

Turning movement counts were collected at one study intersection in September 2014 for the weekday afternoon peak-commute period and typical weekend peak period. Counts at this intersection were collected on March 29, 2015 for the peak weekend (i.e., unseasonably warm) peak period. Although

2 PRESIDIO GATEWAYS TRAFFIC VOLUME SUMMARY (PEAK HOUR VOLUMES)

	Weekday PM Peak Hour					Weekend Peak Hour	
	November / December 2000	October 2005	January 2008	March 2009	September 2014	March 2009	September 2014
	Vehicles per Hour	Vehicles per Hour	Vehicles per Hour	Vehicles per Hour	Vehicles per Hour	Vehicles per Hour	Vehicles per Hour
Marina	456	539	496	654	708	981	941
Gorgas[1]	196	363	315	660	252	673	102
Lombard	1,260	1,101	1,068	1,141	1,173	1,111	1,049
Presidio	1,002	982	1,005	906	1,032	913	861
Arguello	815	774	728	852	988	760	857
14th/15th Avenue[2]	107	134	143	125	246	106	336
25th Avenue	1,072	958	740	1,005	1,028	1,157	1,231
GG Bridge Plaza West	325	471	308	436	688	571	969
GG Bridge Plaza East	734	691	465	750	897	754	1,016
TOTAL	5,967	6,013	5,268	6,529	7,012	7,023	7,362

Source: Presidio Trust 2015

[1] The Gorgas Gate includes the slip ramp in the October 2005, January 2008 and March 2009 counts. The slip ramp was demolished prior to the September 2014 counts.

[2] The 15th Avenue Gate accommodated both inbound and outbound traffic until the fall of 2010, when the 14th Avenue Gate opened for inbound traffic, since which time the 15th Avenue Gate accommodated outbound traffic only (cyclists excepted).

counts at this intersection helped determine the differences between weekday and weekend volumes and between typical weekend and peak weekend volumes, the current volumes at all study intersections are substantially affected by the Presidio Parkway project.[9] Therefore, future projected turning movement volumes for the Lincoln Boulevard/Graham Street, Lincoln Boulevard/Halleck Street and Lincoln Boulevard/Girard Road intersections from the Main Post Update EIS were adjusted and used as the baseline for analysis of future conditions with the proposed project and alternatives.

The peak hour intersection operations analysis was conducted according to the methodology described in the 2000 Highway Capacity Manual (HCM). The HCM methodology calculates the average delay experienced by a vehicle traveling through the intersection and assigns a corresponding level of service (LOS). An intersection operating at LOS D or better is generally considered to be operating acceptably. Levels of service E and F are generally considered unacceptable. At side street stop-controlled intersections, delay and LOS are calculated for each stop-controlled approach and operating conditions are reported for the worst approach. Levels of service for signalized intersections and all-way stop-controlled intersections are based on the weighted average delay per vehicle for all vehicles approaching the intersection.

Table 3 presents the existing delay per vehicle and LOS for the weekday PM peak hour, weekend peak hour and peak weekend peak hour for the intersection of Mason Street/Marina Boulevard/Lyon Street.

PUBLIC TRANSIT SERVICES

Public transit systems serving the Presidio include Muni, PresidiGo shuttle service and Golden Gate Transit. These services provide access to other regional carriers such as BART, AC Transit, CalTrain, SamTrans and the regional ferry system.

PresidiGo Shuttle (Downtown and Around the Park)

The Trust implemented weekday downtown shuttle bus service (PresidiGo Downtown) for Presidio employees and residents in September 2005. Downtown service is now available to the public during midday hours and select runs in the afternoon commute period. Weekend Downtown service began in January 2014, and is open to the public. Ridership has continued to grow on the Downtown route, as illustrated in Figure 6. The PresidiGo Downtown route connects with the Around the Park routes (Crissy Field route and Presidio Hills route) at the Transit Center in the Main Post, and timed transfers allow users to travel to/from other parts of the Presidio with minimal delay. All PresidiGo service is free.

[9] At the time of data collection in the fall of 2014 and early 2015, Halleck Street was closed and Girard Road provided only local access to roadways in the Letterman district.

Intersection	Control Device	Weekday PM Peak Hour		Weekend Peak Hour		Peak Weekend Peak Hour	
		LOS	Delay (sec/veh)	LOS	Delay (sec/veh)	LOS	Delay (sec/veh)
1. Mason Street / Marina Boulevard / Lyon Street	Signal / AWS	C	20	C	27	C	30

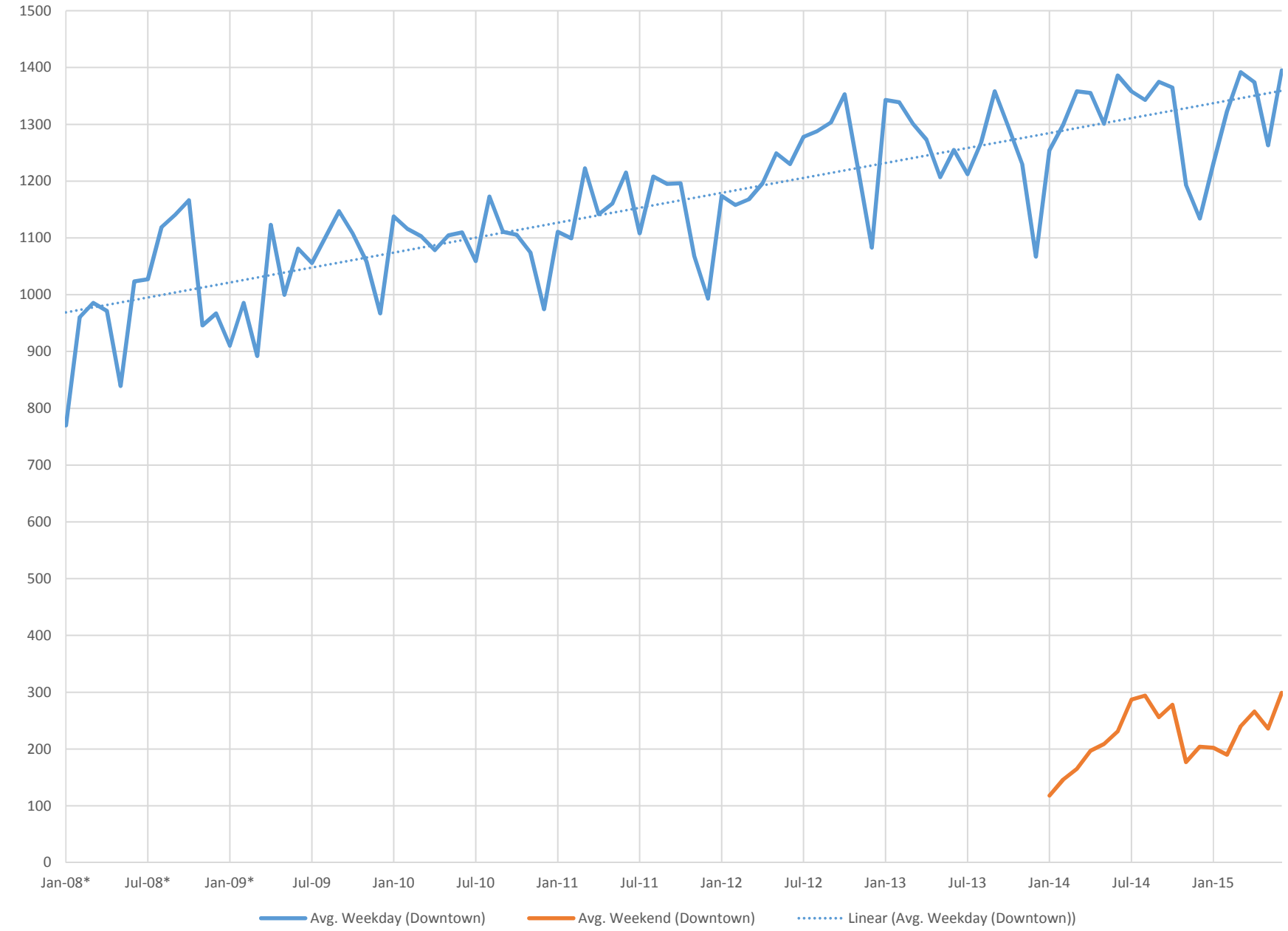
Source: Presidio Trust 2014
Notes: AWS = all-way stop control
LOS = level of service
sec/veh = seconds per vehicle

Muni

Muni recently implemented changes to the 43-Masonic route as identified in the Muni Forward initiative. Most notably, the changes include an extension of the route to the Transit Center within the project site. The 43-Masonic route operates between the Marina and the Excelsior, and now directly serves both the Letterman and Main Post districts. In conjunction with the route changes, Muni also increased frequency during the morning commute period from 10 minutes to 9 minutes and during the afternoon commute period from 12 minutes to 10 minutes.

PEDESTRIAN AND BICYCLE FACILITIES

The project site sits at the center of the Presidio on the border between the Main Post and Crissy Field (Area B) districts, and has been closed as part of the Presidio Parkway construction area for several years. The project will connect key pedestrian and bike routes in the Main Post and Crissy Field. The Presidio Promenade is a Class I multi-use path along the northern edge of the Main Post, and will connect directly to the project site. The portion of the Presidio Promenade between the San Francisco National Cemetery and the Golden Gate Bridge toll plaza was completed in 2008. The path will be connected to the Main Post after construction of the Presidio Parkway. It transitions to sidewalk and Class II bike lanes immediately east of the project site. The future Anza Esplanade runs north-south, extending south from the future Visitor Center in Building 210 and will provide key access to/from the project site to the rest of the Main Post and Arguello Boulevard. On the northern edge of the project site in Crissy Field, Mason Street currently has Class II striped bike lanes in both directions and a roadside Class I multi-use path on the north side. When reconstructed as part of the Presidio Parkway project, Halleck Street will have an uphill/southbound Class II bike lane and a Class III (shared) lane in the downhill/northbound direction. In addition to the paths provided within the project site itself, there will also be a continuous sidewalk



6 AVERAGE DAILY PRESIDIGO RIDERSHIP: DOWNTOWN ROUTE

along the west side of Halleck Street between Lincoln Boulevard and Mason Street. Lincoln Boulevard has sidewalks on both sides of the street and Class II striped bike lanes east of Graham Street.

Would the proposed project or alternatives substantially increase traffic congestion or traffic volumes, or adversely affect traffic safety?

ALL ALTERNATIVES

Impacts on the transportation network would be considered significant if the proposed project or alternatives would cause study intersections to operate at unacceptable levels of service (i.e., LOS E or F).

In order to estimate the number of new vehicle trips that would be generated by each alternative, vehicle trip generation rates[10] were developed for the different land use types for the buildings on the project site (restaurant, educational, retail, etc.) as well as the open space. Vehicle trips for each alternative were calculated for weekday PM peak hour, weekend peak hour and peak (i.e. unseasonably warm) weekend peak hour conditions. Estimates of weekday PM peak hour, weekend peak hour and peak weekend peak hour trips generated by the building uses in the proposed project and each of the alternatives are based on the methodology used in the cumulative analysis for the PTMP EIS, which, in turn, was based on trip generation information from standard data sources such as the San Francisco Planning Department Guidelines for Environmental Review (SF Guidelines), the State of California Department of Transportation (Caltrans), and the Institute of Transportation Engineers (ITE). All of the travel characteristics included in this analysis reflect a moderate level of effectiveness of transportation demand management (TDM) measures associated with all three alternatives so as to not overestimate the effectiveness of TDM measures.

Trip generation estimates for the open space elements of each alternative were based on the calculated trip generation rate for Crissy Field (Area A). The trips associated with Crissy Field were based on existing vehicle counts at the Mason Street corridor entry and exit points (excluding pass-through trips) and the building uses in the Mason Street corridor. The difference between the observed vehicle counts and the building trip generation was determined to be total trips generated by the 107 acres of Crissy Field open space, and suggests a peak hour trip generation rate of 4.64, 6.25 and 6.78 vehicle trips per acre for weekday, weekend and peak weekend conditions, respectively. These rates were applied directly to Alternative 2, which had a similar proportion of usable outdoor space as Crissy Field (50 to 60 percent). Alternatives 1 and 3 have less usable outdoor space (24 percent and 43 percent, respectively), so the trip generation rates were adjusted accordingly. The resulting trip generation rates shown in Table 4 were developed to estimate the number of vehicle trips that would be generated by the project site.

Some trips will be internal to the Presidio; examples include trips by an employee who walks to a nearby restaurant for lunch, or lodging guests attending a wedding in the park, and these internal trips are more

[10] A trip generation rate expresses the number of vehicle trips that would be generated by a unit of given land use type (e.g., restaurant).

4 PEAK HOUR VEHICLE TRIP GENERATION RATES

Land Use	Weekday PM Peak Hour	Weekend Peak Hour	Peak Weekend Peak Hour
Parklands open space (acres)			
Alternative 1	2.25	3.04	3.29
Alternative 2	4.64	6.25	6.78
Alternative 3	4.04	5.45	5.91
Office (thousand square feet)	1.0	0.29	0.29
Retail (thousand square feet)	6.44	8.37	8.37
Restaurant (thousand square feet)	20.89	30.18	30.18
Cultural / Education (thousand square feet)	2.11	1.96	1.96

Source: Presidio Trust 2015

likely to be made by transit, walking, or bicycling than external trips. The mix of land uses within the park would also create "linked" trips. Linked trips are internal trips that are made as intermediate stops on the way from an origin to a primary trip destination. For example, a Presidio employee who stops at the YMCA before traveling home would be a linked trip. The fact that some trips within the Presidio would be linked yields fewer trips than would occur otherwise. The vehicle trip generation rates shown in Table 4 reflect a moderate level of internal trips and linked trips. A complementary mix of uses could result in more internal and linked trips than assumed in this analysis.

The assumed geographic distribution of trips to/from the project site is as shown below:

- Marina Boulevard (i.e., Marina Gate): 40%
- US 101 East (via Girard Road): 30%
- Lombard Street/Presidio Boulevard: 5%
- Arguello Boulevard: 5%
- Highway 1 South: 5%
- Lincoln Boulevard to 25th Ave. Gate: 5%
- Golden Gate Bridge: 10%

Vehicle trip generation rates for each alternative reflect TDM measures to encourage transit, pedestrian and bicycle modes and discourage single-occupant vehicle travel. The TDM program consists of components that can be implemented to meet or exceed the intended traffic reductions. The TDM traffic reductions used in the PTMP EIS and Main Post Update EIS transportation analysis reflect the Trust's minimum performance standards. Since traffic reductions are likely to exceed what has been incorporated here, the traffic forecasts can be considered somewhat conservative. Additional TDM program components would be instituted or existing TDM program elements would be intensified as necessary to achieve additional automobile trip reductions.

Table 5 presents the projected weekday PM peak hour, weekend peak hour and peak weekend peak hour vehicle trip generation estimates for each alternative. The number of vehicle trips would vary by alternative, depending on the amount of built space and usable open space. The number of weekday PM peak hour vehicle trips would range from approximately 233 under Alternative 1 to approximately 254 under Alternative 3. Alternative 1 would have the greatest percentage of native

5 ESTIMATED VEHICLE TRIPS BY ALTERNATIVE (WEEKDAY PM PEAK HOUR, WEEKEND PEAK HOUR AND PEAK WEEKEND PEAK HOUR)

	Alternative 1	Alternative 2	Alternative 3
Weekday PM Peak Hour			
Open Space	32	65	56
Buildings	201	184	198
Total	**293**	**249**	**254**
Weekend Peak Hour			
Open Space	43	88	76
Buildings	258	232	245
Total	**301**	**320**	**321**
Peak Weekend Peak Hour			
Open Space	46	95	83
Buildings	258	232	245
Total	**304**	**327**	**328**

Source: Presidio Trust 2015

plantings and least amount of outdoor gathering space, and therefore would generate fewer vehicle trips. Alternative 2 would have the greatest amount of total outdoor space (lawns, paths, hardscape and terraces), but Alternative 3 would have more building space, resulting in a similar number of vehicle trips. The scheduling of events would require management strategies to minimize the impact on the transportation network. Because the uses on the site are complementary public-serving uses, visitors to the paths, overlooks and gathering spaces are also likely to enter the Visitor Center, the Transit Center or New Observation Post. Thus, the estimated total number of trips generated by each alternative is conservative, and the actual number of total trips may be lower. If all project trips were attributed to the Main Post, the number of trips generated by the Main Post district would increase 3 percent from what was evaluated in the Main Post Update EIS under Alternatives 2 and 3.

The new direct connection to the Presidio Parkway via Girard Road is expected to relieve some of the existing traffic congestion occurring at the Lombard Gate and accommodate growth in traffic volumes to/from the park. Halleck Street is being rebuilt as part of the Presidio Parkway project, and is expected to open in 2016. After the opening of Halleck Street, the Trust will periodically monitor traffic volumes at gates and key intersections during the weekday and weekend peak periods.

Based on the future projected traffic conditions, and the estimated traffic volumes for each of the alternatives, future traffic operating conditions were calculated for the study intersections for weekday PM peak hour, weekend peak hour and peak weekend peak hour conditions, as shown in Table 6. For unsignalized side street stop-controlled intersections, the level of service (LOS) and delay per vehicle are presented for the approach that would experience the worst delay. For all-way stop-controlled or signalized intersections, the overall intersection LOS and average delay per vehicle are presented. When forecasted intersection volumes exceed capacity substantially, the calculated intersection delay increases exponentially absent any mitigation to reduce volume or increase capacity. For these intersections, the forecasted delay is noted as greater than 50 seconds.

Traffic impacts at all of the study intersections could be mitigated to acceptable operating conditions of LOS D or better. In the Main Post Update ROD, signalization was identified as the mitigation measure for the Lincoln Boulevard/Graham Street and Lincoln Boulevard/Halleck Street intersections. Signalization would mitigate the operation of these intersections to LOS D or better with or without the additional traffic generated by the project, however any mitigation measures including signalization would be considered as a last resort. These study intersections are at the center of the Main Post district, and although the Trust has identified signalization as the mitigation measure as required by the NEPA, the Trust would only signalize these intersections in the long term and after review of the potential impact on historic resources. TDM measures such as more frequent and/or extensive PresidiGo service (particularly on weekends), modifications to parking fees or restrictions, and enhanced carpooling or vanpooling incentives would be considered and implemented before signalization. Other measures to reduce the total number of vehicle trips include measures to encourage more trip “linking” between uses in the

Intersection	Existing Control Device	Mitigation Control Device	Existing Conditions		Alternative 1				Alternative 2				Alternative 3			
					Unmitigated		Mitigated		Unmitigated		Mitigated		Unmitigated		Mitigated	
			LOS	Delay (sec/veh)	LOS	Delay (sec/veh)	LOS	Delay (sec/veh)	LOS	Delay (sec/veh)	LOS	Delay (sec/veh)	LOS	Delay (sec/veh)	LOS	Delay (sec/veh)
Weekday PM Peak Hour																
1 Mason/Marina/ Lyon	Signal/ AWS	n.a.	C	20	C	25.4			C	25.7			C	25.9		
2 Mason/Halleck	AWS	Signal	–	–	D	26.9			D	27.4			D	27.7		
3 Lincoln/Halleck	SSS	Signal	–	–	**F**	**>50**	B	11.8	**F**	**>50**	B	11.8	**F**	**>50**	B	11.8
4 Lincoln/Graham	AWS	Signal	–	–	B	14.8			C	15.0			C	15.1		
5 Lincoln/Girard	AWS	Signal	–	–	D	29.4			D	29.5			D	29.5		
Weekend Peak Hour																
6 Mason/Marina/ Lyon	Signal/ AWS	n.a.	C	27	C	33.4			C	34.2			C	34.3		
7 Mason/Halleck	AWS	Signal	–	–	**E**	49.0	A	9.4	**F**	**>50**	A	9.4	**F**	**>50**	A	9.4
8 Lincoln/Halleck	SSS	Signal	–	–	**F**	**>50**	A	9.1	**F**	**>50**	A	9.1	**F**	**>50**	A	9.1
9 Lincoln/Graham	AWS	Signal	–	–	D	30.1			D	31.4			D	31.5		
10 Lincoln/Girard	AWS	Signal	–	–	**E**	**35.6**	B	11.0	**E**	**35.7**	B	11.1	**E**	**35.9**	B	11.1
Peak Weekend Peak Hour																
11 Mason/Marina/ Lyon	Signal/ AWS	n.a.	C	30	C	34.6			D	36.1			D	36.1		
12 Mason/Halleck	AWS	Signal	–	–	**F**	**>50**	B	10.1	**F**	**>50**	B	10.1	**F**	**>50**	A	9.9
13 Lincoln/Halleck	SSS	Signal	–	–	**F**	**>50**	A	10.0	**F**	**>50**	A	10.0	**F**	**>50**	A	10.0
14 Lincoln/Graham	AWS	Signal	–	–	**E**	**48.2**	A	0.4	**F**	**>50**	A	0.4	**F**	**>50**	A	0.4
15 Lincoln/Girard	AWS	Signal	–	–	**F**	**>50**	B	11.4	**F**	**>50**	B	11.5	**F**	**>50**	B	11.5

Source: Presidio Trust 2015

Notes: AWS = all-way stop control LOS = level of service
SSS = side street stop control sec/veh = seconds per vehicle n.a. = not applicable
Bold *type indicates unacceptable operating conditions (LOS E or LOS F).*

parklands project or other nearby uses. The traffic analysis assumes a modest amount of trip linking between various uses. Encouraging linked vehicle trips between compatible uses (e.g., between Visitor Center and restaurants or between restaurants and Main Post lodging) would reduce the total number of vehicle trips to/from the Presidio.

ALTERNATIVE 1 – PRESIDIO TRUST MANAGEMENT PLAN UPDATE

Alternative 1 would generate 233 weekday PM peak hour vehicle trips, 301 weekend peak hour vehicle trips and 304 peak weekend peak hour vehicle trips. As shown in Table 6, of the five studied intersections, the minor approach to the Lincoln/Halleck intersection would operate at unacceptable levels (LOS E or F) during the weekday PM peak hour, three intersections would operate unacceptably in the typical weekend peak hour, and four intersections would operate unacceptably during the peak hour of a peak weekend.

The Lincoln Boulevard/Halleck Street intersection is stop-controlled on the Halleck Street approach, and the Halleck Street approach is the approach that would experience unacceptable delay. Vehicle trips leaving the project site would have the option of using the all-way stop-controlled intersection of Lincoln Boulevard/Graham Street intersection, which is expected to operate better than the Halleck Street approach to the Lincoln Boulevard/Halleck Street intersection. The Lincoln Boulevard/Halleck Street intersection was not expected to operate at an unacceptable level of service in the PTMP EIS. In the PTMP EIS, Lincoln Boulevard was assumed to have two lanes in each direction, reflecting the geometric modifications originally described in the 1994 NPS General Management Plan Amendment (GMPA). Class II bike lanes were added to this section of Lincoln Boulevard several years ago, and in the analysis for the Main Post Update EIS and this analysis, the future lane configuration is assumed to be the same as it is currently. Recommended transportation mitigation measures listed at the beginning of this chapter would improve the operation of the study intersections to LOS D or better.

ALTERNATIVE 2 – PRESIDIO PARKWAY

Alternative 2 would generate 249 weekday PM peak hour vehicle trips, 320 weekend peak hour vehicle trips and 327 peak weekend peak hour vehicle trips. As shown in Table 6, of the five studied intersections, three intersections would operate at unacceptable levels (LOS E or F) under Alternative 2 during the typical weekend peak hour, and four would operate at LOS E or F during the peak weekend peak hour. The Mason Street/Halleck Street intersection is expected to operate at LOS F under typical weekend conditions if traffic volumes are not reduced through TDM measures. Recommended transportation mitigation measures listed at the beginning of this chapter would improve the operation of the study intersections to LOS D or better.

ALTERNATIVE 3 (PROPOSED PROJECT) – NEW PRESIDIO PARKLANDS

Alternative 3 is estimated to generate 254 weekday PM peak hour vehicle trips, 321 weekend peak hour trips and 328 peak weekend peak hour trips, similar to Alternative 2. In the weekday PM peak hour, weekend peak hour and peak weekend peak hour, Alternative 3 would result in unacceptable service levels (LOS E or F) at the same number of intersections as Alternative 2. Recommended transportation mitigation measures listed at the beginning of this chapter would improve the operation of the study intersections to LOS D or better.

Would the proposed project or alternatives adversely affect traffic safety for pedestrians and bicyclists?

ALL ALTERNATIVES

Bicycle access and pedestrian circulation within the Main Post were reviewed as part of the Presidio Trails and Bikeways Master Plan (Trust and NPS 2003). Key trails connecting to the project site include the Presidio Promenade and future Anza Esplanade. The trails within the new parklands would substantially improve pedestrian and bicycle connections between Crissy Field and the Main Post, making walking and bicycling safer and more viable modes of travel.

Implementation of the proposed project or alternatives would result in an increase in pedestrian and bicycle activity within and near the project site and on adjacent streets. The increase in pedestrian and bicycle activity would generally be accommodated within the existing and planned surrounding pedestrian and bicycle network, and the trails within the project site would provide key connections to the surrounding network. Proposed major paths and path nodes would be appropriately sized and configured to accommodate expected volumes. The anticipated mix of pedestrians and could be accommodated, even on peak days. Secondary paths would experience much lower volumes and only need to be wide enough to support comfortable visitor travel with the ability for visitor groups to pass each other in the same or opposite directions. A width of 6 feet or more would ensure that an acceptable level of service is maintained on the secondary paths.

Providing bicycle and pedestrian amenities such as shelters, benches, water fountains, secure bicycle racks, route lighting, and other facilities throughout the Presidio, as called for by PTMP ROD Mitigation Measure TR-9 *Pedestrian/Bicycle Amenities*, combined with the new connections within the project site, and bikeway and trail improvements outlined in the Presidio Trails and Bikeways Master Plan, would provide a pedestrian and bicycle network that would adequately accommodate pedestrians and bicycles without creating hazards, barriers, or access restrictions for pedestrians and bicyclists.

Would the proposed project or alternatives adversely affect public transit services?

ALL ALTERNATIVES

All alternatives would generate additional transit trips for several Bay Area transit providers and would most affect the transit providers that directly serve the Main Post (Muni and the Presidio's shuttle, PresidiGo), with Alternative 3 generating the greatest number of additional transit trips. Ridership on PresidiGo weekday peak period Downtown service is near capacity today during peak months, and additional capacity will be needed to keep pace with increasing demand. Weekend PresidiGo Downtown service currently has available capacity. The San Francisco Municipal Transportation Agency (SFMTA) Transit Effectiveness Project (TEP) informed several Muni service changes being implemented as part of the Muni Forward program. The change with the greatest impact to the alternatives is the route changes to the 43-Masonic route, which includes connecting directly to the Transit Center in the Main Post and extending the route terminus from Chestnut Street/Fillmore Street intersection to Fort Mason (Marina Boulevard/Laguna Street intersection). The Muni Forward improvements also include increased frequency on the 43-Masonic route from every 10 to every 9 minutes in the morning commute period and from every 12 to every 10 minutes in the afternoon commute period. The increased frequency will help accommodate additional transit riders generated by the proposed project or alternatives.

Mitigation measures called for in the PTMP ROD, including PresidiGo service, supporting increased frequency on Muni lines (TR-10 *Support Increased Muni Frequencies*), and monitoring of Golden Gate Transit routes and coordination with Golden Gate Transit (TR-25 *Transit Service Monitoring Program*), would reduce the impacts on transit service.

Would construction-related traffic conflict with local and regional traffic?

ALL ALTERNATIVES

Because construction vehicle trips traveling to and from the project site would be dispersed, the vehicle trips on other regional roadways would not be substantial and would generally fall within the normal fluctuations of traffic. The reduction in construction traffic associated with the upcoming completion of the Presidio Parkway would be substantially greater than the increase associated with the parklands project, so the total volume of construction traffic in the park would be less than it is today. Construction activities would include import of soil, grading, construction of paths, planting, building rehabilitation and new construction, utility upgrades, and other infrastructure enhancements. Construction vehicles would include trucks hauling construction debris and delivering construction materials and supplies, as well as construction worker vehicles. The volume of construction vehicles traveling to and from the project site would vary, depending on the specific construction activity and the schedules of the various building elements of each of the alternatives. Construction vehicles would generally enter the Presidio

via the new US101 interchange on Girard Road. Truck traffic would comply with city truck restrictions on nearby streets (e.g., Marina Boulevard and Lyon Street). Construction management as called for in the PTMP ROD (Mitigation Measure TR-26 *Construction Traffic Management Plan*) would adequately mitigate impacts due to construction traffic.

CONCLUSION

All alternatives would contribute to anticipated unacceptable operating conditions at study intersections, particularly on weekends. Signalization would mitigate the operation of the study intersections to LOS D or better with or without the additional traffic generated by the alternatives. Signalization would be considered in the long term subject to further review of the potential impact on historic resources. Recently expanded MUNI bus service, improved pedestrian and bicycle connections included in the proposed project, and TDM measures such as more frequent and/or extensive PresidiGo service would encourage and accommodate the use of non-automobile modes, and reduce traffic congestion at all study intersections to acceptable levels. Management of events and programs would minimize traffic congestion on peak days.

PARKING

Parking occupancy information has been collected on a recurring basis in the Crissy Field (Area B) and Main Post districts over the past decade. Table 7 provides a summary of recently collected data within approximately a ½- to ¾-mile (10-15 minute walk) of the project site. The greatest weekday occupancy of parking in the Main Post generally occurs early to mid-afternoon. On weekends, parking utilization in the Main Post varies considerably depending on the schedule of outdoor events (e.g., Sunday Picnics with food truck vendors). At Crissy Field, parking conditions are more likely to vary with weather conditions. Over 70 percent of the planned building square footage in the Main Post is currently occupied, and approximately 45 percent of the planned building square footage is currently occupied in the Crissy Field (Area B) district. Parking utilization will increase with increased occupancy of buildings in these districts.

Parking management strategies to manage parking supplies and reduce demand have primarily included parking fees in recent years, with time restrictions in a small number of locations. As the number and various types of visitor destinations increases, short-term parking demand will increase, and the relative proportion of long-term (i.e., employee) parking demand will decrease. Parking management strategies will be adapted accordingly to make the most efficient use of available parking supplies, introducing time limits near visitor destinations to encourage turnover of spaces and differential pricing to shift long-term parking demand to less proximate parking areas. These parking management policies will be coordinated with other transportation programs to create a coherent, effective approach to accommodating, but discouraging automobile use and promoting more sustainable means of travel.

Parking supply is not considered to be a significant environmental impact under the NEPA. As a result of parking shortfalls, individuals who would prefer to drive may use alternate means of transportation because the perceived convenience of driving is lessened by a shortage of parking. This shortage is not considered significant because it implements Trust transportation demand management policies intended to reduce park-wide traffic congestion, and air quality, noise and safety impacts caused by congestion. The Trust, however, does acknowledge that parking conditions are of interest to the public and decision-makers, and therefore provides the following parking analysis for informational purposes only.

7 PARKING SUPPLY AND CURRENT UTILIZATION

		Weekday		Weekend		Peak Weekend	
	Supply	Occupancy	Utilization	Occupancy	Utilization	Occupancy	Utilization
Main Post[1]	1,753	863	49%	556	32%	1,334	76%
Crissy Field[2]	1,129	378-495	33-44%	754-833	67-74%	1,033-1,107	91-98%
Total	2,882	1,241-1,358	43-47%	1,310-1,389	45-48%	2,367-2,441	82-85%

Source: Presidio Trust 2015
[1] Summer 2015. Includes project site. Excludes Infantry Terrace neighborhood.
[2] Areas A and B. Excludes Fort Point and Cavalry Stables areas.

Would the parking demand associated with the proposed project and alternatives be accommodated within the proposed supply?

ALL ALTERNATIVES

Parking demand for all alternatives primarily consists of short-term demand by visitors and a small amount of long-term parking by employees. Different land uses experience peak parking demand on different days of the week. Alternative 1 includes some office use and consequently has a parking demand on weekdays similar to weekends. Alternatives 2 and 3 include visitor-oriented uses and would have greater parking demand on weekends than weekdays. The parking demand associated with large weekend special events would need to be managed to ensure adequate parking supply in the Main Post district. Alternative 2 would have the greatest amount of usable outdoor space, but Alternative 3 would have the greatest amount of built space. Alternatives 2 and 3 would generate similar weekday and weekend parking demand.

The project site is on the border between the Main Post and Crissy Field (Area B) districts, and motorists are expected to park in both districts. Several of the anticipated future changes in the parking supply in the Crissy Field (Area B) district would be associated with completion of the Presidio Parkway and return of associated construction support space to the park. The parking lot east of the Commissary (Building 610) would be expanded by approximately 66 spaces, the lot near the east Mason Street warehouses would be built to provide approximately 210 spaces, the temporary parking lot within the Quartermaster Reach site would be removed, and a 45-space parking lot would be added immediately east of Building 640. Anticipated changes in long-term parking supply in the Main Post include a reduction in spaces associated with the Anza Esplanade and expansion of the parking lot near Building 387.

Table 8 presents a summary of parking demand, as compared to supply, for each alternative. Alternative 1 would have the least parking demand, and Alternatives 2 and 3 would have similar parking demand, on both weekdays and weekends. Parking demand on weekends varies in both the Main Post and Crissy Field. In the Main Post, the size and number of events is the primary variable in parking demand. At Crissy Field, there is little variability in the parking demand generated by building uses in Area B, but weather conditions and programming create more variability in the parking demand in Area A.

As required by PTMP EIS Mitigation Measure TR-22 *TDM Program Monitoring*, the Trust has implemented a Transportation Demand Management (TDM) program to reduce automobile usage by all tenants, occupants and visitors. If TDM goals are not being reached, the Trust would implement more aggressive strategies or intensify components of the existing program, such as requiring tenant participation in more TDM program elements and/or providing more frequent and/or extensive shuttle service.

All alternatives would have adequate parking supply to accommodate demand on weekdays and typical weekends. On peak weekends when there are outdoor events in the Main Post and increased demand at Crissy Field, overall parking demand would exceed supply, resulting in a small deficit in the combined Crissy Field and Main Post districts. Implementation of Mitigation Measure TR-21 *Presidio-Wide Parking Management* as identified in the PTMP ROD would manage parking conditions to minimize parking impacts. In addition, increasing parking supply in key areas to meet demand would minimize the negative effects of motorists circulating in search of available parking. Any added parking supply would be located to be shared between various uses and maximize efficiency.

Under all alternatives, outdoor events would be scheduled and coordinated based on parking availability, and events would be sized and capped at 1,200 persons to ensure that supply meets expected demand. Events requiring large amounts of parking would not be scheduled concurrently with other events or Presidio peak parking demand periods. On days in which events occur at both the Main Parade and within the project site lawns, during peak arrival periods, adjacent roadways could become congested and vehicles could be parked in areas not designated for parking, including adjacent road shoulders and fields. In addition, due to the increased amount of interpretive elements throughout the project site, the length of stay for leisure visitors could be extended. As required by PTMP ROD Mitigation Measure TR-24 *Special Event Parking Management*, the Trust would coordinate events with other park event venues (indoor and outdoor) so that combined parking demand would not exceed parking supply. A multi-pronged approach to parking management for peak activity periods would be implemented, including:

- promoting transit (e.g., MUNI or PresidiGo), taxi service, and walking and biking;
- event-specific shuttle bus service;
- valet parking;

Alternative 1 would provide the largest number of parking spaces on the project site (124), but would generate the least demand of the three alternatives. Alternative 2 would provide approximately 87 spaces on the project site. Alternative 3 has comparable outdoor space as Alternative 2, but has more built space. Parking demand would be greater than with Alternatives 1 or 2, but onsite parking supply (53) would be less than other alternatives. Under all alternatives, there would be adequate parking at the Main Post and Crissy Field to accommodate the additional parking on weekdays and typical weekends.

8 COMPARISON OF PARKING DEMAND AND SUPPLY BY ALTERNATIVE

	Alternative 1 (number of parking spaces)			Alternative 2 (number of parking spaces)			Alternative 3 (number of parking spaces)		
	Weekday	**Weekend**	**Peak Weekend**	**Weekday**	**Weekend**	**Peak Weekend**	**Weekday**	**Weekend**	**Peak Weekend**
Estimated Demand									
Project Site	132	130	145	119	156	187	125	157	184
Main Post (excluding project site)	1,315	894	1,672	1,315	894	1,672	1,315	894	1,672
Crissy Field (Area B, excluding project site)	396	707	820	396	707	820	396	707	820
Crissy Field (Area A)	185	418	654	185	418	654	185	418	654
Total	**2,028**	**2,149**	**3,291**	**2,015**	**2,175**	**3,333**	**2,021**	**2,176**	**3,330**
Supply									
Project Site		124			87			53	
Main Post (excluding project site)		1,675			1,675			1,675	
Crissy Field (Area B, excluding project site)		822			822			822	
Crissy Field (Area A)		561			561			561	
Total		**3,182**			**3,145**			**3,111**	
SURPLUS/DEFICIT	**1,154**	**1,033**	**-109**	**1,130**	**970**	**-188**	**1,090**	**935**	**-219**
SURPLUS/DEFICIT - Percent	**36**	**52**	**-3**	**36**	**31**	**-6**	**35**	**30**	**-7**

Source: Presidio Trust 2015

Note: Parking demand and supply for Main Post excludes Infantry Terrace residential neighborhood. Parking demand and supply for Crissy Field (Area A) includes East Beach and West Bluff parking areas.

- supplementing PresidiGo Around the Park and Downtown route capacities and frequencies;
- shuttle service to/from any underutilized parking areas in other parts of the Presidio;
- providing temporary signs to route vehicles to overflow parking areas; and
- establishing differential pricing and/or time limits for parking adjacent to the project site.

CONCLUSION

None of the alternatives would significantly impact the availability of parking in the Crissy Field or Main Post districts. On most days, parking management and other TDM measures would accommodate parking demand while also encouraging use of non-automobile modes. Management of events and programs would minimize impacts on peak days.

VISITATION

CRISSY FIELD

Crissy Field (Area A), located directly north of the project site, features 100 acres of a unique, landscaped and restored natural coastal environment within the Presidio, offering exceptional recreation and learning opportunities to a wide range of visitors. Crissy Field includes a 22-acre restored tidal marsh and dunes, the scenic Crissy Field Promenade/Bay Trail, the Crissy Field Center, seating areas, a restored historic airfield, a beach, a fishing pier (Torpedo Wharf) and a Class 1 bike path. The Crissy Field Promenade is a segment of the Bay Trail and generally follows the northern edge of Crissy Field. East Beach, located east of the tidal marsh area, consists of several picnic areas, parking and restroom facilities. East Beach is also a popular launching site for windsurfers, kiteboarders and nonmotorized watercraft users such as kayakers. The Crissy Field Center, temporarily located in Building 1199 at the east end of East Beach, hosts numerous environmental education and leadership programs for children and families. West Bluff Picnic Area, located at the northwest end of Crissy Field, consists of several picnic areas, parking, restroom facilities, and food and beverage facilities. The Gulf of the Farallones National Marine Sanctuary headquarters is located on Crissy Field West. Facilities include the Ocean Climate Center, Visitor Center and classrooms. Crissy Field has more visitors than it was originally designed to accommodate. Access is difficult on weekends when there is exceptional weather and special events. However, on most existing weekdays and weekends, there is zero to minor crowding (NPS 2012).

The NPS manages all special events at Crissy Field (Area A) under Title 16, U.S. Code and Title 36, Code of Federal Regulations, 2.50. Policy guidance for management of special event activities is provided in NPS Policies, Director's Order 53 Special Park Uses, and the GGNRA Superintendent's Compendium (updated annually). Special use permits are issued in accordance with the Crissy Field Plan EA (Jones &

Stokes 1996), which designates the area for "a variety of active recreational uses." The decision to issue or deny a permit for a special park use flows from the appropriate compliance under the NEPA and other applicable laws. Permits are denied if special events would result in significant conflict with other existing uses or program activities.

Within Crissy Field (Area B), the Trust requires appropriate permit conditions for organized events and schedule/coordinate such events with the NPS to minimize visitor use impacts and ensure that park resources are protected (PTMP ROD Mitigation Measure CO-7 *Special Events*).

MAIN POST

The Main Post, which forms the southern edge of the project area, is the "heart of the Presidio", historically serving as the social and administrative center of the post. Today, the Main Post is a center for public programs from films to festivals, with destinations and amenities that help visitors experience, understand and enjoy the park. The 4.5-acre Main Parade, recently restored as a green open space sloping from the center of the Main Post towards the project site, hosts informal gatherings and everyday activities as well as organized public events. The Visitor Center, which provides maps, brochures and suggested activities, temporarily operates in Building 36 while planning for its new, permanent location in Building 210 within the project site. The Officers' Club in Building 50 features exhibits, programs and cultural events including live music and dance, talks, films, family activities and educational offerings. Other public places include the 22-suite Inn at the Presidio, the Walt Disney Family Museum, the Museum of the Society of California Pioneers, the Golden Gate Club, the Presidio Bowling Center, the Transit Center, the Archaeology Lab, and several restaurants and cafés.

NEW PRESIDIO PARKLANDS

Visitors to the project site are currently confronted by a fenced-off area containing a large-scale construction site. The Presidio Parkway tunnel tops are clearly in view and separate the Presidio's Main Post from Crissy Field. Except for the Transit Center, visitor amenities such as landscaping, plantings and lawns, paths, vista points, gathering spaces, lighting and power are not yet evident. Despite the temporary degraded visual condition of the site, passers-by noticing the unobstructed views and proximity to the waterfront can readily imagine the visitor opportunities and potential afforded by the parklands project.

VISITATION MEASURES

Both the NPS and the Trust manage the levels of use visiting the Presidio to help control issues associated with crowding and traffic and reduce conflicts between activities that share facilities and areas. Management actions and protection measures are coordinated to control visitation to ensure that safe conditions are maintained and appropriate uses of the park can be enjoyed by visitors. Such measures include managing distribution of visitors and controlling crowding, implementing visitor safety

measures, limiting visitor access to sensitive areas, restricting parking and vehicle access, and/or closures when capacity is reached.

Would the proposed project or the alternatives adversely affect the existing visitor experiences and uses of the park?

ALL ALTERNATIVES

Project Site Visitation Capacity

Existing visitor experiences and uses would be adversely affected if the management and facilities capacities of the park are exceeded and/or visitor density becomes unsafe and/or unsatisfactory. In particular, visitor satisfaction and experience would be reduced overall if the availability, maintenance and/or quality of walkways, restrooms, lawn areas, programs offered, visitor information, and commercial services in the project area are reduced due to high visitation.

The proposed project and alternatives include an allocation of open landscape areas, for visitor rest, recreation and group gathering, and to support programs or events. When no outdoor programs or events are being held, visitor demand for these areas would be relatively low; especially in light of the abundance of similar type areas at Crissy Field and the Main Post. The estimated maximum number of visitors (people at one time) that would be onsite for each alternative, including visitors in buildings and public circulation areas, along with the estimated average length of stay, is provided in Table 9.

For special events, excessive congestion could occur if demand exceeds the project site capacity. Thus, outdoor events would be limited to those that do not exceed the site capacity. The types of events envisioned for the project site are those that are relatively small to moderate in scale. The Trust would cap events on the project site at 1,200 persons to ensure that comfortable visitation conditions are always maintained (Orca Consulting LLC 2015). The Trust's event approval process required by PTMP ROD Mitigation Measure CO-7 *Special Events* would ensure that the recommended levels would not be exceeded.

Each alternative also includes an allocation of food service, retail and restroom capacity. These capacities would be planned to meet the expected visitor demand levels as closely as possible, especially for restrooms. For retail and food service facilities, whenever wait lines form, queue areas would be implemented. It is not anticipated that wait lines would grow to long lengths, as visitors would opt for other dining and retail locations rather than waiting in line. On peak days, food and retail carts and trucks could also be implemented to minimize wait lines and take advantage of the unsatisfied visitor demand.

Visitation Demand at Crissy Field

For all alternatives, site designs would ensure that visitation impacts on the project site are minimized, thus requiring a minimum amount of mitigation measures to be implemented – ORCA Consulting LLC (2015)

There would be more visitors from Crissy Field that would reroute their visit through the new parklands than there would be new parklands visitors that go to Crissy Field, so the net impact would be a slight reduction in visitor demand for Crissy Field activities (i.e., Crissy Field visitors that opt to spend more time at the project site and less time at Crissy Field). Pedestrian/bicyclist traffic volumes for Crissy Field would increase slightly, due to the path connections enabling cross-traffic between Crissy Field and the Main Post, but there would be a shift in traffic patterns from Crissy Field's main Promenade to the connector paths, which should be a beneficial impact, as the crowded Promenade would be alleviated,

9 MAXIMUM NUMBER OF PEOPLE ONSITE BY ALTERNATIVE

	People at One Time (PAOT)		
	Weekday	**Weekend**	**Peak Day**
Alternative 1	1,427	1,641	1,962
Average Length of Stay (hours)	*1.0*	*0.9*	*0.8*
Alternative 2	2,153	2,984	3,594
Average Length of Stay (hours)	*1.4*	*1.4*	*1.3*
Alternative 3	1,857	2,749	3,396
Average Length of Stay (hours)	*1.3*	*1.2*	*1.2*

Source: ORCA Consulting LLC 2015

and other lower-use Crissy Field paths would be activated. Therefore, a slight reduction in Crissy Field PAOT's and slight increase in pedestrian/bicyclist traffic volumes (but improved traffic distribution) is expected. On days with large events with viewing areas on Crissy Field, such as Fleet Week, it is likely that some visitors would park at the project site and other Main Post lots and walk through the new parklands to Crissy Field for event viewing. On these days, there would be an increase in Crissy Field pedestrian traffic and use.

ALTERNATIVE 1 – PRESIDIO TRUST MANAGEMENT PLAN UPDATE

This alternative would feature a mostly natural landscape with limited programming. Visitors would be drawn to the site to reflect and be inspired, to immerse themselves in a more natural environment, and discover and explore the larger setting. The project site would be largely undifferentiated and would not support gathering areas for performances and activities, picnics and cultural events. Key visitor amenities would include pathways, native plantings, modest interpretative exhibits/signage, and small areas to picnic, sit and enjoy the views. The primary north-south paths would provide access from the Main Post to Crissy Field while the more meandering east-west paths would allow visitors to stroll. The lack of amenities, such as seating, lighting, shade/shelter or places to store belongings would only likely attract visitors to the Presidio who are already familiar with the park. Visitor activities would include solitary walks or meeting in small groups to appreciate the views along the bluff top. Building 211 would be designated for office use and would not support public use for programs or provide shelter from the elements. The Crissy Field Center would not be expanded with new Field Station and Classroom buildings to serve the general public and to provide needed spaces for the growing environmental education and leadership programs for under-served youth. Because the outdoor Learning Landscape would not be included, opportunities for education would be limited.

An estimated 1,427 people at one time would visit the project site on a peak weekday, and 1,641 on a peak weekend day (ORCA Consulting LLC 2015). Individuals participating in nearby uses or experiences that would like to use other park areas would appreciate the improved connectivity between the upland and lowland areas of the Presidio brought about by the project, as would those seeking solitude and natural quiet. However, the lack of amenities and services would not likely introduce new-to-the-park users to the project site, or result in a markedly improved visitor experience. Many visitors to the Main Post or Crissy Field would be unaware of the proposed changes. There would be little increase in visitor understanding of the significance of the Presidio due to improved programs, exhibits, information, media and other educational experiences. Those visitors who prefer a wider range of activities and more support services to facilitate their visit may be disappointed.

Depending on location of optimum viewpoints along pathways, and due to the absence of established overlooks, some crowding could occur along portions of the pathway when groups stop for photos or orientation. In congested areas, some visitors may step off the established paths and on to delicate land and vegetation. Wayfinding and identification signs would encourage group gathering at established gathering areas only. Gathering areas at the north and south entrances would facilitate group orientation prior to and after traversing the project site pathways. Local tour operators would be provided guidance on stopping points, areas to avoid, and overall rules for visitation at the project site.

Pathway entrances to the north and south could experience bottlenecking during arrival and departure surges for events at Main Post and Crissy Field. For peak arrival and departure surges, personnel and/or volunteers would be placed at critical parklands entrance points to encourage visitors to use all available entrances and pathways (improved demand distribution). Additional, temporary wayfinding would be in place for peak events (e.g., major concerts at Main Post, Fleet Week viewing at Crissy Field, etc.).

Educational gatherings would be limited to the three planned gathering areas to avoid creating congestion.

As this alternative does not include additional restroom, food service and retail spaces, during peak periods, insufficient availability of key visitor services could result in overcrowding at existing facilities such as the Transit Café and restrooms. For peak periods, temporary supplemental services would be provided and placed in locations which would not obstruct visitor flow. Temporary services would include portable restrooms, food and retail carts and/or kiosks, and supplemental waste receptacles.

ALTERNATIVE 2 – PRESIDIO PARKWAY

Compared to Alternative 1, this alternative would provide a more diverse landscape consisting of lawns, gardens, meadows and native plantings throughout the project site. Participatory spaces would be provided for assembly, education, tours, learning and interaction. Lawn areas in and around Buildings 210 and 211 and at the Eastern Promontory would allow visitors to gather. Medium-sized special events

and community programs would be held. Multiple activities in areas on the bluff top could happen simultaneously, and several paths down the embankment would allow visitors to be immersed in the native plantings. A highly visible and centrally located gathering area would be provided at the Central Promontory. Building 211 (Observation Post) would function as a program and special events facility. Similar to Alternative 1, the Crissy Field Center would not be expanded with new buildings. While the outdoor Learning Landscape would not be constructed, a large lawn area in the center of the native plantings could provide more programmed amenities than Alternative 1.

A peak weekday would be expected to attract 2,153 visitors at one time to the project site, whereas a peak weekend day would attract 3,984 visitors at one time (ORCA Consulting LLC 2015). New user groups, including people of all ages from diverse audiences and ethnic communities, would be attracted to the site for performances, cultural events, and picnics. Places for people of all ages would be available to play games such as lawn bowling or bocce ball or climb stumps, ladders and rope bridges, or to experience fog, sound, wind and other weather patterns. The large plaza around the Visitor Center would inform visitors and inspire them to visit other park destinations. Some visitors who prefer a contemplative experience may feel that programs and gatherings are in conflict with a desirable park experience while others might like the range and types of spaces and activities provided.

Similar to Alternative 1, some crowding could occur along portions of the pathways when groups stop for photos or orientation. Wayfinding and identification signs would encourage group gathering at established gathering areas only. Gathering areas at the north and south entrances would facilitate group orientation prior to and after traversing the pathways. Local tour operators would be provided guidance on stopping points, areas to avoid, and overall rules for visitation at the project site.

Also as in Alternative 1, certain pathway entrances to the north and south could experience bottlenecking during arrival and departure surges for events at Main Post and Crissy Field. For peak arrival and departure surges, personnel and/or volunteers would be placed at critical entrance points to improve demand distribution. Additional, temporary wayfinding would be in place for peak events.

For special event activity on the lawn areas, pathways directly feeding these areas would periodically experience arrival and departure surges. Lawn area feeder pathways would be appropriately sized to avoid creating congestion.

Building 211 would provide additional restroom capacity, and would be subject to availability for general visitor use depending upon planned programming within these two spaces. If these facilities are not available to the general public during peak visitation periods, crowding at existing public restroom facilities on the project site could occur. During peak periods, insufficient availability of key visitor services such as food services and restrooms could result in overcrowding at existing facilities such as the Transit Café, and upkeep of these spaces at peak operation could be difficult to perform. For peak periods, temporary supplemental services would be provided and placed in proximity to the existing Transit Café,

or in adjacent outdoor spaces which would not obstruct visitor flow. Temporary services would include portable restrooms, food and retail carts and/or kiosks, and supplemental waste receptacles.

ALTERNATIVE 3 (PROPOSED PROJECT) – NEW PRESIDIO PARKLANDS

Compared to Alternative 1, Alternative 3 would provide more visitation opportunities and encourage greater participation by the local and regional population, including those that are not traditional park visitors. The setting would serve as a place offering a greater variety of outdoor educational and interpretative experiences, including more onsite interpretive materials and programs. Gathering and programmable spaces of varying size and character would be provided to support a diversity of experiences, including small intimate seating areas (for individuals and small groups), spaces for family picnics and touring groups, and spaces for community programs. The range of spaces would welcome the most diverse audience of participants to experience the new parklands while providing connections to the many adjacent park resources. The new parklands would function as a main trailhead to the rest of the Presidio trail network. Visitors would be able to reference the centrally located Visitor Center plaza (the Zocalo) as a meeting place and encourage them to visit other park destinations. The New Observation Post would function as a program and event facility that also provides visitors shelter from the weather.

The military history and legacy of service that defines the Presidio would be highlighted by interpretive features, including a compass rose depicting the expeditions and deployments from the Presidio at the Central Overlook. Interpretive elements might make the Presidio more relevant to new visitors by connecting them to the multi-cultural heritage and extensive history of the park.

The gathering areas at the Central Overlook and adjacent terraced seating on the embankment would provide panoramic views over the bay. One or more paths down the embankment would be wide enough to allow bicycle and pedestrian use and enable visitors to be immersed in the natural landscape along the embankment. The Learning Landscape would provide an outdoor place-based environmental learning experience that focuses on the natural and cultural history of the site including unstructured play. The adjacent Crissy Field Center would be expanded with a new Classroom building to provide needed space for continuing the environmental learning program for under-served youth and a public Field Station, which would serve as an orientation and meeting place for drop-in visitors to the Learning Landscape.

Among the alternatives, Alternative 3 would provide the greatest amount of infrastructure to support visitors. An expected 1,857 people at one time would visit on a peak weekday, and 2,749 on a peak weekend day (ORCA Consulting LLC 2015). Visitors would enjoy quintessential National Park experiences such as a fire circle and terraced seating for ranger-led talks. Those focused on simply appreciating the setting would benefit from the enhanced scenic viewing through the removal of Building 211, replaced by the New Observation Post on the eastern edge of the project site, and the addition of the new overlooks.

Visitor amenities including restrooms at the New Observation Post and the Field Station, adequate seating, lighting, shade/shelter, and places to store belongings would likely appeal to a wider audience of visitors and would also likely encourage an increased stay time and repeat visitation. Those expressing interest in having more onsite interpretive materials and programs, or for engaging diverse audiences would value the many opportunities for first-hand learning brought about by this alternative. Some of the local visitors who frequent the park on a regular basis, particularly those seeking solitude and quiet, may not find places for gathering and programs appealing. They might find solace, however, in the ample trail opportunities afforded by the alternative, which would provide a tranquil park experience. Providing trails received strong support from all potential user groups during scoping.

Alternative 3 provides the most generous pathway sizing on the south end of the project site, enabling more comfortable flow to and from the Main Parade during events. However, pathway entrances to the south that lack similar sizing could experience bottlenecking during arrival and departure surges during major events. As in all alternatives, for peak arrival and departure surges, personnel and/or volunteers would be placed at critical parklands entrance points to encourage visitors to use all available entrances and pathways (improved demand distribution). Additional, temporary wayfinding would be in place for peak events.

Similar to the other alternatives, during peak periods, insufficient availability of key visitor services such as food services and restrooms could create overcrowding at existing facilities such as the Transit Café, and upkeep of these spaces at peak operation could be difficult to perform. Supplemental, temporary food services and portable restrooms would be provided in proximity to the café, or in adjacent outdoor spaces.

CONCLUSION

All alternatives would allow visitors to begin using a new area within the park. Each would improve connectivity to and between adjacent areas in the park, facilitate the visitor experience, and increase opportunities for visitor understanding of the Presidio to a different degree. The diversity of the audience and the number of participants would depend upon the range of activities, settings and services offered. From an operations perspective, Alternatives 1 and 3 would provide the least risk of impact to park resources, as compared to Alternative 2, due to a) less relative demand due to less programing (Alternative 1) or b) greater amount of infrastructure to support heightened demand levels (Alternative 3). Current frequent users of the park may not appreciate the increase in the number of new visitors attracted to the project area or the additional opportunities for recreation, education, inspiration and enjoyment offered. Site designs would ensure that visitor use impacts are minimized. Management actions would be available to ensure that park resources are protected.

CULTURAL RESOURCES

The 14-acre project site is located within the Presidio of San Francisco National Historic Landmark District (NHLD). The project site sits at the nexus of historic development on the former military post, between waterfront and uplands, industrial and ceremonial spaces, utilitarian and recreational uses. The area that is now Crissy Field once consisted of an extensive tidal marsh at the base of the bluffs. A seasonal creek drained the plateau on which the Main Post now sits, flowing northeast into the marsh near where present-day building 603 now stands. This ecologically rich area provided bountiful resources for the Ohlone people of the area, who were called Yelamu in the northern peninsula. With the arrival of the Spanish in 1776, the transformation of the area by non-Native hands began, first with the establishment of the adobe fort to the south, and later by large-scale earth moving activities under the U.S. Army. The development of the Main Post after the American takeover in 1846 followed the original Spanish geometry and orientation toward the bay. By 1870, a roadway (the future Lincoln Boulevard) had traversed the northern end of the project site, marking what would soon become the northern limit of the Main Parade. The Army populated the area between the road and the edge of the bluff with stables and other utilitarian structures. The creek was filled by 1895, thereby creating the Main Parade and an expanded stables area. In 1900, the Guardhouse (today's Building 210) was completed, echoing the style and material of the nearby Montgomery Street Barracks, and exerting a more permanent presence on the bluff than the earlier frontier-style stables buildings.

Refer to the New Presidio Parklands Project Finding of Effect (Attachment 2) for a complete discussion of the identification and assessment of effects for the parklands project (undertaking) under Section 106 of the NHPA, and a summary of the parkland project's consistency with applicable guidelines for the project site.

The Presidio of San Francisco was designated a National Historic Landmark District – the nation's highest classification of historic significance – in 1962.

In the early 20th century, the U.S. Army began filling the bayfront slough, enabling the relocation of the stables and other back-of-house functions from the upper bluff to the lower waterfront. The 1915 Panama Pacific International Exposition brought sweeping change to Crissy Field, completing the fill effort and constructing a vast, temporary "city" of exhibit halls, as well as a racetrack. The onset of World War I cut the exposition short, and its buildings were replaced with a large cantonment of barracks. Infrastructure, including a rail line along Mason Street and associated warehouses, connected the Presidio to Fort Mason and the Port of San Francisco during this time. The waterfront barracks were removed as the airfield functions extended to the east beginning in 1921, but Crissy Field closed as an active airfield in 1936 due to treacherous flying conditions and advances in military aviation. By 1941, the Mid-Crissy area largely consisted of a densely-built collection of motor pool, storage and warehouse buildings (including today's Building 603), many of which remained until the 1980s. On the Main Post, the fire station (the first facility of its kind on a U.S Army post) was constructed in 1917, and by World War II the area adjacent to it was populated by wood frame barracks.

The northern Main Post's present-day use as a transit hub, parking and services area largely dates to the late 1960s, when the booming civilian population working on-post necessitated dining options for non-service people, and transit infrastructure for commuters. The present-day organization of the Mid-Crissy area largely dates to 1989, when the remaining motor pool buildings were removed, and the Commissary (Building 610, now Sports Basement) and associated parking were constructed. Today,

vestiges of each of these episodes remain within the project site boundaries, creating an enormous opportunity for engaging park visitors, interpretation and revitalization.

NHLD CONTRIBUTORS WITHIN THE PROJECT SITE

Building 603 is the only NHLD-contributing building within the project site include Buildings 210, 603, and 201.[11] Additionally, the parklands project would be visible from approximately 11 historic buildings and sites which contribute to the NHLD. Although the NHLD and these nearby contributing resources as a whole retain integrity as historic properties, the project site has been substantially altered as a result of construction of the Presidio Parkway.

CURRENT INTEGRITY OF THE PROJECT SITE

The Doyle Drive Finding of Effect (FOE) and Finding of Effect Addendum (SFCTA 2005, 2007) found that construction of the new tunnels in the area north of the Main Post and the new causeway in the area east of Halleck Street would result in changes to the cultural landscape and the alteration of the historic topography in this portion of the Presidio. The presence of a continuous bluff was a character-defining feature of the Presidio, and its alteration caused a direct adverse effect to the integrity of the Presidio.

Construction of the Presidio Parkway substantially changed the historic character of the majority of the project site, with the demolition of the NHLD contributing roadway, buildings and other contributing resources, construction of twin tunnels and re-creation of the former bluff which historically separated the Main Post with Crissy Field, and relocation of NHLD contributing Building 201 (located at the eastern edge of the project site). The Presidio Parkway also removed 49,500 square feet of non-historic built space (former Buildings 605 and 606/Public Storage facility, built 1972) that was directly adjacent to the west and south of Building 603. As such, the project site has considerably reduced levels of integrity when compared to other portions of the NHLD.

Building 603, which will be rehabilitated by the parklands project to serve as an expanded Crissy Field Center, was rehabilitated for the same purpose by the Golden Gate National Parks Conservancy in 2001 with a finding of "no adverse effect." Character defining features of the building's interior and exterior have been identified in the draft New Presidio Parklands Project Supplemental Design Guidelines (Trust 2015b) (Attachment 4), which contains direction about retaining them in the currently anticipated rehabilitation. The integrity of the project site around Building 603 is substantially altered from the end of the period of significance. All structures from this formerly densely-built site have been removed by either the U.S. Army or the Presidio Parkway, with the exception of (Old) Mason Street to the north.

[11] Building 201 (built 1896) is currently listed as a contributing resource to the NHLD, and in 2016 will be moved by the Presidio Parkway project from its present, temporary storage location to its permanent position on Halleck Street; however, the Presidio Parkway project has moved the building, removed its lower level, and will soon rehabilitate the remaining structure. The Presidio Parkway project carries a commitment to re-evaluate the building's contributing status following its rehabilitation. Building 201 will not be directly affected by the New Presidio Parklands project.

Would the proposed project or the alternatives directly or indirectly affect contributing features of the Presidio NHLD?

Direct effects of a project include actions such as removal of historic structures. Indirect effects include new construction that could affect the setting of NHLD contributors.

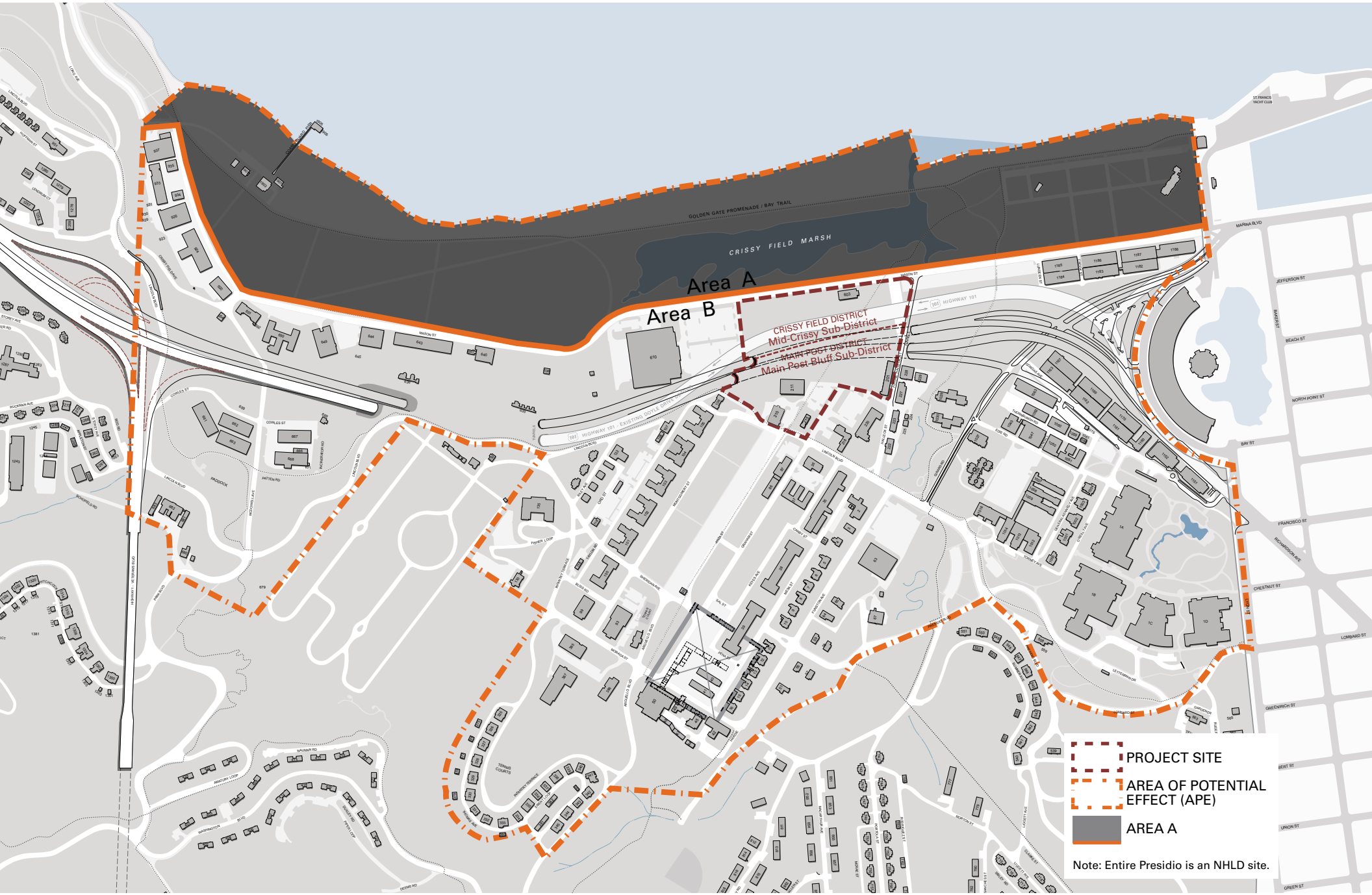
The project area, or Area of Potential Effect (APE) for the parklands project (undertaking) extends well beyond the limits of the 14-acre project site and includes three PTMP planning districts [the Main Post, Crissy Field (Area B) and Letterman] and Crissy Field (Area A) that overlap or are visually connected to the project site. The following discussion also refers to various sub-areas and resources within the APE, which could be potentially affected (directly or indirectly) by the undertaking. The APE and sub-areas have been the subject of a number of guidelines and treatment recommendations prepared by the Trust and others, including the supplemental design guidelines, which will be finalized as part of the parklands project. In general, maintaining consistency with the guidelines and other applicable planning documents would avoid adverse effects to historic resources. The APE and sub-areas are shown in Figure 7.

ALTERNATIVE 1 – PRESIDIO TRUST MANAGEMENT PLAN UPDATE

Building rehabilitation, stabilization, and maintenance that would occur under this alternative would protect the overall status of the NHLD. As Building 211 would be retained in its current location, its retention would continue to impede historically significant northerly views from the Main Parade. No new construction would occur in the vicinity of Building 603; instead, open space and views would be emphasized rather than the historically densely built setting. The historic structure (Building 603) would be returned to service as the Crissy Field Center with the same level of programming and uses as existed prior to construction of the Presidio Parkway project. Landscape rehabilitation and retention of historic roadways on the edges of the project site would be generally beneficial. Large areas of predominantly native plantings on the northern end of the bluff top would be incompatible with the historic landscape character of the Main Post, which consists of lawns, gardens and ornamental plantings. The addition of trees above and inland of the tunnels could also limit bay views to the northwest from portions of the Main Post. Through conformance with the supplemental design guidelines, this potential adverse effect would be minimized.

ALTERNATIVE 2 – PRESIDIO PARKWAY

This alternative would be consistent with the Doyle Drive Historic Property Treatment Plan for the Built Environment, and would be consistent with the Doyle Drive Architectural Criteria, the intention of which is to minimize and/or mitigate adverse effects of the Presidio Parkway project to the integrity of the NHLD. As with Alternative 1, Building 211, retained in its current location, would continue to impede historically significant northerly views from the Main Parade. No new construction would occur in the vicinity of Building 603, which would emphasize open space and views rather than the historically densely built setting. Building 603 would, like Alternative 1, be returned to service as the Crissy Field Center with



7 AREA OF POTENTIAL EFFECT

the same level of programming and uses as existed prior to the Presidio Parkway project. Compared to Alternative 1, the planted character of the project site would be characterized by three distinct zones: lawns, gardens and meadows on the bluff top; native plantings on the bluff face; and a combination of the two zones at the Crissy Field level. This differentiation is generally more compatible with the historic planted character of the three areas than that proposed under Alternative 1, however the large areas of lawn west of Building 603 are incompatible with a site that was historically either bayfront marsh of a light-industrial "working waterfront." Through conformance with supplemental design guidelines, this potential adverse effect would be minimized.

ALTERNATIVE 3 (PROPOSED PROJECT) – NEW PRESIDIO PARKLANDS

Implementation of this alternative would have no direct adverse effect on the NHLD. Similar to the other alternatives, the project site is visible from approximately 11 historic buildings and sites which contribute to the NHLD, this alternative could indirectly affect them as a result of the change to their historic setting. These include historic buildings on the northerly end of the Main Post, to either side of the Main Parade, as well as those along Lincoln Boulevard and Halleck Street. Rehabilitation of Building 603 to serve an expanded Crissy Field Center program would directly affect the historic building and new construction to support the expanded program could indirectly affect the resource. The potential for direct and indirect effects is addressed under each project feature.

Removal and Replacement of Building 211

Under this alternative, Building 211 (Observation Post, built 1968) would be demolished and replaced with the New Observation Post of similar size, at a nearby location. Removal of Building 211 would have no adverse effect to the NHLD as it is a non-contributor to the NHLD. Its removal would reopen historically significant northerly views from the Main Parade and adjacent historic buildings. To avoid indirectly affecting any NHLD contributors in the vicinity of Building 211, the New Observation Post would be constructed out of the viewshed of the Main Parade, to the north of non-historic Building 215. New construction would conform to the supplemental design guidelines. Specifically the new construction would:

- not exceed an average height of 68.61 feet above sea level, which is the peak of the roof of adjacent Building 215; the highest point of new construction would not exceed 80.85 feet above sea level, which is the ridgeline of nearby Building 210;
- be organized on the site according to patterns of historic development in the area (e.g., perpendicular to Lincoln Boulevard and/or parallel with Graham Street);
- sited to the north and/or east of existing buildings so as to be minimally visible from the historic core of the Main Post.
- maintain a set back from the bluff edge to avoid obstructing views from Crissy Field;

- screen the non-historic parking area between Building 220 and Graham Street from the Main Post bluff landscape area to the west through the use of new buildings and/or landscaping;
- serve as a replacement for non-historic Building 211 in order to re-establish views north from the foot of the Main Parade and the rear of Building 210;
- not exceed 9,294 square feet of total new construction in the Main Post Bluff Sub-District (the size of existing Building 211);
- consider breaking new buildings into smaller volumes in order to disperse their mass;
- not destroy historic materials that characterize the property, and differentiate the new work from the old, and be compatible with the massing, size, scale and architectural features of the Main Post bluff's historic resources; and
- adhere to the appropriate building materials and color palettes identified in the Main Post Bluff Subarea Design Guidelines (Trust 2011) and treatment recommendations in the Main Post Bluff Subarea of the Main Post Cultural Landscape Report (Trust 2012).

Rehabilitation and Expansion of Building 603

Under this alternative, the Crissy Field Center (Building 603, built 1939) would be rehabilitated and new educational/program facilities would be constructed to the south of Building 603 to house event and visitor serving space for the Crissy Field Center programs and additional classrooms. Rehabilitation of Building 603 would conform to the supplemental design guidelines and applicable treatment recommendations, and would not substantially alter the design or materials of the building. The design of the expansion of Building 603 is currently envisioned as two buildings (Field Station and Classroom building). The expansion would be constructed to conform to the supplemental design guidelines. Specifically the new construction would:

- maintain a 70-foot setback from Mason Street so that the west elevation of the historic building is not obscured;
- not exceed 34 feet above sea level (the height of the new Main Post bluff elevation); the average height of the roof of the new structure(s) would not exceed 29.5 feet above sea level (the bottom of 2nd floor window openings on the south elevations of Building 603);
- favor permeable and open facades that allow for strong connections between interior uses and street life and/or exterior spaces;
- break new buildings into smaller volumes in order to disperse their mass over this once-densely built site;
- not exceed 5,800 square feet in any single building adjacent to Building 603 (half the size of the building); and would not exceed 7,500 square feet of total new construction within the Youth Campus;

- concentrate new deck elements, as needed, on the south side of the building, except where to provide universal access to the building's elevated first floor plate;
- incorporate flood control measures into the construction of the building to help minimize damage from flooding; and/or design new construction that is temporary in nature, or can be easily repaired or replaced in the event of damage due to flooding; and
- adhere to the identified Building 603 character defining features and treatment recommendations, as well as the list of appropriate building materials and color palettes identified for the Mid-Crissy Area Design Guidelines (Trust 2011); and
- place compatible new structures in the vicinity of Building 603, which was historically part of a more densely built setting than it is today.

Circulation Features and the Overlooks

- The Anza Esplanade would be extended to connect the Main Post to the Central Overlook, a central viewing and gathering point, while establishing a rectilinear northward extension of the sightlines down Anza Street, allowing continuous views and direct pedestrian access from the Main Parade on the south, to the Learning Landscape and Building 603 along Mason Street on the north, and to Crissy Field further north.
- The rectilinear orientation of the Anza Esplanade would reference the axial arrangement of roads and buildings surrounding the Main Post, without directly mimicking these elements.
- The Central Overlook, a central viewing and gathering point, would provide direct visual connections to the larger landscape, including Crissy Field, as well as the San Francisco Bay and the Golden Gate Bridge in the distance, while lending a strong sense of place and a reminder of the Presidio's historic connection with the San Francisco Bay.
- At the center point of the overlook, a two-dimensional (i.e., flat), interpretive element in the landscape design dedicated to telling the story of the military at the Presidio and service of individuals to their country is being considered.
- The Anza Esplanade and Central Overlook would maintain the setting and feeling of the Main Post and the Mid-Crissy areas, and support fulfillment of the historic preservation criteria provided in the Doyle Drive Architectural Criteria Report (Caltrans 2008).
- The Bluff Walk would constitute the main east-west pedestrian connection along the new bluff edge, and include pedestrian connections from the Main Post down to the Learning Landscape and Building 603. A series of viewing terraces would line the edge of the bluff and be oriented directly on axis with the Golden Gate Bridge and Alcatraz, consistent with direction from existing guidelines.
- The Bluff Walk would be a pedestrian circulation feature that complements the re-created bluff that once separated the upper and lower posts, while providing a direct pedestrian throughway across the

northern edge of the Main Post, and connections to Mason Street and Crissy Field beyond, as existed prior to the construction of Doyle Drive in 1937.

- The viewing terraces would provide direct visual connections to the larger landscape lending a strong sense of place and a reminder of the Presidio's historic connection to the San Francisco Bay. Although the proposed Anza Esplanade and three overlooks, as well as the Bluff Walk, would be new landscape elements visible from the northern edge of the Main Post and Crissy Field, these walkways would be relatively flat, two-dimensional linear objects placed on the ground plane of the new landscape, and would enhance, rather than obstruct, views from adjacent resources.

Zocalo

The new Zocalo would function as a main social and multi-functional arrival and gathering plaza between the Transit Center (Building 215) and the Visitor Center (Building 210). The landscaped pedestrian plaza would replace the non-historic paved parking lot that currently exists in the same location, and would retain the cluster of mature Monterey cypress trees as a focal point of the plaza. Retention of mature trees while removing non-historic hardscape materials and reactivating this autodominated space with a multi-functional pedestrian plaza would maintain the setting and feeling of the Main Post that existed during the majority of the period of significance.

Landscape and Hardscape

The rehabilitation treatment under the parklands project would seek to reestablish elements of the area's natural character, in addition to structures and amenities supporting its newly-envisioned environmental education program. The character of this new landscape would be compatible with the setting and feeling of adjacent natural areas, and all new features would be small-scale and subordinate to existing historic resources (Building 603, Mason Street).

- As under Alternative 2, the planted areas are designed to complement and differentiate between the landscape character of Crissy Field, the bluff face and the Main Post. Unlike Alternative 2, the preferred alternative limits the amount of new lawn proposed for the Crissy Field area, which is more in keeping with the historic character of the area.
- These new park elements would be consistent with the wider landscape character of the Main Post and Mid-Crissy areas, and support fulfillment of the historic preservation criteria provided in the Doyle Drive BETP and Architectural Criteria Report (Caltrans 2008).

CONCLUSION

None of the alternatives would have a direct or indirect adverse effect on the NHLD. Alternative 3 would result in a visible change to the landscape when viewed from contributing resources in the project area, due primarily to new construction (New Observation Post), building rehabilitation and expansion (Building 603) and key project elements (Anza Esplanade Extension, overlooks, Zocolo and Bluff Walk). However,

conformance with applicable design guidelines and planning documents would ensure that the design and construction of the New Observation Post and Crissy Field Center expansion are consistent with the Secretary's Standards, resulting in a new structure or structures that are compatible with the character defining features of the NHLD and its contributing resources, including the setting and feeling of the NHLD in the project area. The key project elements would be compatible with established design criteria and would therefore enhance the qualities and characteristics of the project area and the NHLD as a whole.

ARCHAEOLOGICAL RESOURCES

"The Trust shall take all reasonable measures to protect archaeological sites and features identified inside the Presidio National Historic Landmark District." – Presidio Trust Programmatic Agreement

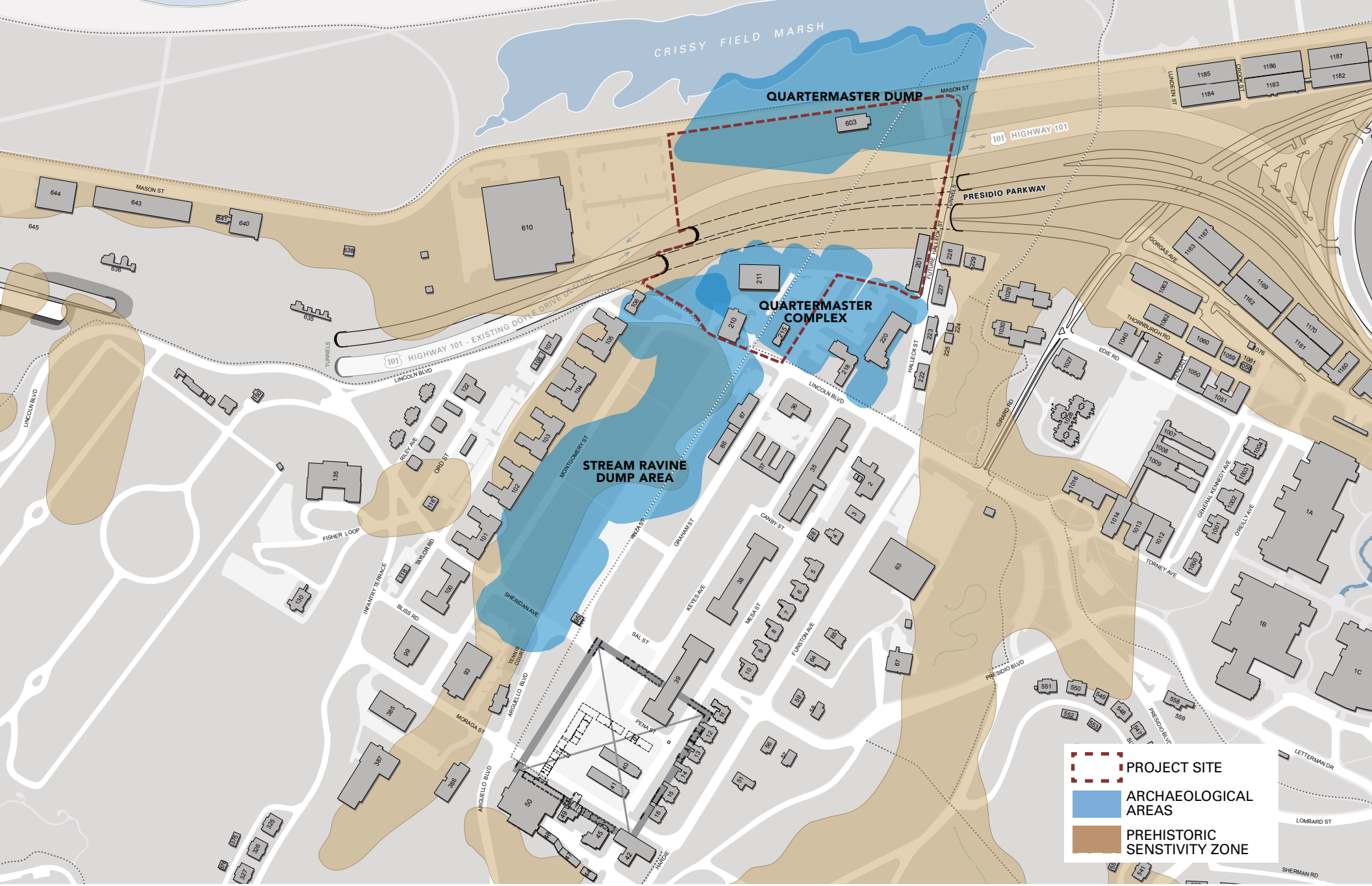
Contributing archaeological areas of the NHLD were predicted through the use of historic maps and documentary evidence as part of the 1993 NHL Update (NPS 1993). Subsequent archival research, GIS modeling and excavation have provided additional information about predicted areas of the NHLD. In certain cases, subsurface archaeological testing and other excavation efforts have confirmed the presence of the predicted resources and enabled the Trust and NPS to characterize archaeological areas of the NHLD. The Quartermaster Complex, Quartermaster Dump and Stream Ravine Dump archaeological areas, all of which contribute to the NHLD, are within or directly adjacent to the project site. Additionally, a portion of the project site is considered to be sensitive for prehistoric archaeological deposits (Figure 8).

QUARTERMASTER COMPLEX ARCHAEOLOGICAL AREA (1860s-1910s)

The Quartermaster Complex archaeological area is predicted based on historic maps and historical documentary evidence. The complex was located at the north end of the Main Post and consisted of a series of buildings and structures such as stables, a bakery, blacksmiths, shops and storehouses. A total of 21 buildings and structures were part of the complex. Most of the buildings were removed prior to 1915 but a few remained in use through World War I. The footprint of the Quartermaster Complex lies under Buildings 210, 218, 220, 211 and 215 and a series of parking lots. Archaeological remains associated with the Quartermaster Complex could be expected to include privies, trash pits, dumps or sheet refuse deposits, stone or brick foundations from former buildings, and features associated with an open work space or yard.

QUARTERMASTER DUMP ARCHAEOLOGICAL AREA (1880s-1910s)

The Quartermaster's Dump archaeological area is known to contain archaeological deposits based on previous archaeological investigations. The area consists of a series of landfills dispersed over acres of the bayfront landscape of the Presidio. The Quartermaster Dump was a late 19th century garbage dump where refuse from the post was deposited into the bayshore marsh. Previously, trash disposal on the post had occurred close to the site of its production in privies. Beginning in the 1890s, garbage disposal at the Presidio began to occur in a more consolidated fashion into the communal dump maintained by the



8 ARCHAEOLOGICAL AREAS

Quartermaster Corps. Discrete dumping in the marshlands had occurred earlier and may be represented at the basal layers of the site. By the turn of the 20th century, a garbage cremator was located near the Quartermaster Dump, along Halleck Street along the Presidio Wharf. Combustible garbage was burned while noncombustible materials such as tin cans, stable waste and ashes were disposed of in the marsh. The Quartermaster Dump archaeological deposits were eventually capped by additional fill brought in for the 1915 Panama Pacific International Exposition.

STREAM RAVINE DUMP ARCHAEOLOGICAL AREA (1770s-1890s)

The Stream Ravine Dump archaeological area is predicted based on the presence of a stream ravine that bisected the current Main Parade. Given trash disposal practices of the 19th century, it is likely that trash was deposited in the stream ravine to be washed away, thus preventing trash buildup on the post. Additionally, the Stream Ravine Dump area would have been an attractive and convenient location for domestic work such as washing clothes and preparing food. The location of the Stream Ravine Dump area is predicted from historic maps that depict the course of the stream ravine before it was filled by the Army in 1893. The stream was likely used throughout the life of the fort by the Spanish, Mexican and American occupants until it was filled in 1893.

PREHISTORIC ARCHAEOLOGICAL SENSITIVITY

The Presidio of San Francisco is within the traditional territory of the Ohlone, a Penutian-speaking group that anthropologist hypothesize migrated into the San Francisco Bay region from the Central Valley. The exact timing of this migration is not known, but estimates range from around 1000 B.C. to 500 A.D. (Levy 1978). Two archaeological sites, CA-SFR-6/26 and CA-SFR-126, have been within the project area. It is thought that CA-SFR-129 (ca. 1300-1780s A.D.) may represent the ethnohistorically-known village of Petlenuc, which is associated with the Yelamu local tribe that inhabited the northern end of the San Francisco peninsula at Spanish arrival (Milliken 1995). CA-SFR-6 appears to be an earlier phase of Native Californian occupation (ca. 750 - 1350 A.D.) located very close to CA-SFR-129 and also on the bayshore estuary. The lower bluff of the project site is within an area that has been designated sensitive for precontact archaeological deposits, given the proximity to CA-SFR-6/26 and CA-SFR-129 and a similar bayshore environment. The tops of any archaeological deposits are predicted to be covered by substantial historic fill that was placed either as trash or as hydraulic fill in preparation for the Panama Pacific Exposition (PPIE) in 1915.

Would the proposed project or alternatives affect known or predicted archaeological sites or features?

ALL ALTERNATIVES

The proposed project and alternatives have been designed to avoid adverse effects to known and predicted archaeological areas of the NHLD. Archaeological oversight would be built into all design and construction phases to ensure that the archaeological deposits associated with either the Quartermaster Complex, Quartermaster Dump, Stream Ravine Dump or the pre-contact occupation of the area are preserved in place and to provide a plan of action in the event of an inadvertent discovery. An Archaeological Management Assessment (AMA) (Jones 2015) has been prepared for the proposed project in accordance with the Presidio Trust Programmatic Agreement (PTPA). An Archaeological Monitoring Plan (AMP) and, if necessary, an Archaeological Identification Plan (AIP) would be prepared to guide implementation of the proposed project.

Quartermaster Complex

The Quartermaster Complex is expected to be a series of shallowly buried building elements (foundations) and associated trash deposits. Previous archaeological testing of the unpaved areas did not locate intact archaeological deposits that could be securely associated with the Quartermaster Complex (Jones and Stokes 2002). Pavement over a large portion of the area prevents archaeological identification testing prior to construction. Therefore, archaeological identification testing and monitoring of ground disturbance would be employed during construction to ensure the avoidance of adverse effects. Archaeological features that retain integrity or contribute to the significance of the Quartermaster Complex archaeological area would be identified, documented and preserved in place during construction. If testing identifies archaeological features with integrity that contribute to the significance of the Quartermaster Complex, new construction would be designed to avoid these features.

Quartermaster Dump

The Quartermaster Dump archaeological area is expected to be a very dense deposit of trash buried below at least 3 feet of fill (Blind and Barnaal 2008 and adjacent archaeological investigations). Under Alternative 3, the rehabilitation and expansion of Building 603 and the adjacent Learning Landscape are at least partially within the Quartermaster Dump archaeological area. In order to avoid adverse effects to this deposit, design efforts to date have focused on keeping required project elements within the upper 3 feet below current ground surface and/or using imported fill to raise grades across the site. If during the schematic phase, it is decided that deeper elements are required, archaeological identification testing will determine if archaeological deposits are present. If archaeological deposits that contribute to the Quartermaster Dump archaeological area are identified, the proposed project would be redesigned

to avoid these resources. Archaeological monitoring would be conducted during construction to ensure that any archaeological deposits that are inadvertently discovered are documented and treated appropriately.

Stream Ravine Dump

All alternatives call for new landscaping west of Building 210 over the Stream Ravine Dump archaeological area. Any archaeological deposits associated with the Stream Ravine Dump are expected to be buried at depth (5+ feet below current ground surface) and would not be affected by the proposed project (Blind and Barnaal 2008). If project plans change to include substantial excavation, additional archaeological consultation would be built into the design. Archaeological monitoring would be conducted during construction to ensure that any archaeological deposits that are inadvertently discovered are documented and treated appropriately.

Pre-Contact Sensitivity

Project elements north of the slope embankment are considered to be sensitive for pre-contact archaeological deposits. Archaeological deposits associated with the pre-contact occupation of the Presidio are expected to be buried below historic soils brought in to fill the marshlands. Archaeological testing (Jones and Stokes 2002; GANDA 2013) and geoarchaeological modeling for the Doyle Drive Project (GANDA 2013) suggest that the potential to locate pre-contact deposits is low and that any deposits with physical integrity would likely be deeply buried. Archaeological monitoring would be required during construction to ensure that any pre-contact archaeological deposits that are inadvertently discovered are documented and treated appropriately.

CONCLUSION

None of the alternatives would likely adversely affect any known or predicted archaeological properties in the project area. Archaeological resources would be protected by adhering to procedures outlined in the PTPA. Archaeological monitoring of ground disturbing activities during construction would ensure that there are no adverse effects to known or predicted archaeological areas or any deposits that are inadvertently discovered during construction. An Archaeological Monitoring Plan (AMP) would guide this monitoring once design is complete and before construction commences. The AMP specifies the location, frequency and duration of required archaeological monitoring and the steps to ensure appropriate treatment of any resources discovered during construction. Archaeological Treatment Plans for individual sites and the AMP prepared for previously unknown sites would ensure that any discoveries are handled in accordance with all stipulations of the PTPA.

VISUAL RESOURCES

The Presidio's diverse topography, vegetative communities and historic landscapes each contribute to its visual quality and public interest. Together, they make the former military post a defining feature of San Francisco's northern waterfront.

VISUAL SETTING

The project site is situated along the coastal terrace bluff, amidst two distinctive landscape types. The Presidio's open and expansive coastal plain is the defining characteristic of the landscape to the north of the site. The historic Main Post and surrounding wooded hillsides form the project area's southern landscape. The project site extends along the coastal bluff between Crissy Field Marsh to the north and the Main Post to the south.

Northern Coastal Plain

The project site is situated along the coastal terrace bluff that frames the Presidio's northeastern shoreline. The coastal bluff forms a natural divide between the Presidio's relatively flat and mostly restored coastal plain and its hilly and more densely developed upland areas.

Defining features of the northern coastal plain are the restored marsh and surrounding coastal scrub vegetation, the open lawns of Crissy Field and East Beach picnic area, and the broad sandy beach and open waters of San Francisco Bay. The Presidio's coastal plain is mostly free of vertical structures and tall vegetation, providing for panoramic views of the San Francisco Bay shoreline and landmarks. Structures within the coastal plain are primarily confined to locations south of and oriented towards Mason Street (e.g., former air hangers, warehouses and administrative buildings to the west and warehouse buildings to the east). Building 610 is also located along Mason Street, immediately adjacent to the project site's northwestern border. Building 610 is a non-historic post-World War II building that is oriented toward an adjacent parking lot rather than to Mason Street. Most of the structures along Mason Street are unified by their white walls and red roofs, a color scheme that is represented throughout the Presidio's structural landscape.

Main Post and Southern Hills

Defining features of the project area's southern landscape include the Main Post's highly ordered layout of streets, buildings, parking lots, and manicured open spaces, backed by contrasting steeply-sloping wooded hillsides. The Main Post is organized on a northeast/southwest grid that frames central rectilinear lawns or parade grounds. The largest of these open spaces is the Main Parade that extends through the center of the Main Post, sloping gently to the northeast towards San Francisco Bay. Buildings are arranged in linear clusters, following the northeast/southwest grid, and form a consistent built edge along the parade grounds. Eight of the Presidio's nine most prevalent architectural styles are represented in the Main Post. While the structures represent styles popular during the various periods of military post construction, the Main Post buildings are unified by the military's basic and straightforward approach to construction and design (Trust 2010a). They tend towards formal symmetry, avoid excessive ornamentation, and are generally consistent with the bulk, heights, masses, and color schemes (red and white) that comprise the Presidio's historic landscape (Trust 2010a).

Project Site

The project site is bisected by a segment of the Presidio Parkway, which includes two 1,035-foot-long cut-and-cover tunnels extending from Halleck Street in the east to Building 106 in the west. The portion of the project site through which the tunnels and adjacent construction areas pass is currently enclosed in 4- to 6-foot tall chain-link construction fence, the majority of which includes red privacy slats that screen this portion of the project site, and is closed to public access. Ornamental street trees line the south side of Mason Street and contrast with the low lying coastal scrub vegetation characteristic of the restored Crissy Field Marsh to the north.

Notable structural elements within the project site include Building 603 along its northern border, as well as Buildings 201, 210, 211 and 215 along its southern border. While Building 603 is isolated along the project site's northern border, its height, bulk, mass and color scheme (white walls and red roof) are visually consistent with most other structures along Mason Street to the east and west, and Main Post to the south. Building orientations within the project site's southern border break from the formal geometric organization of the adjacent Main Post. These buildings are similarly diverse in architectural style, but remain unified with their counterparts to the south through consistent heights, bulks, masses and color schemes (white walls and red roofs).

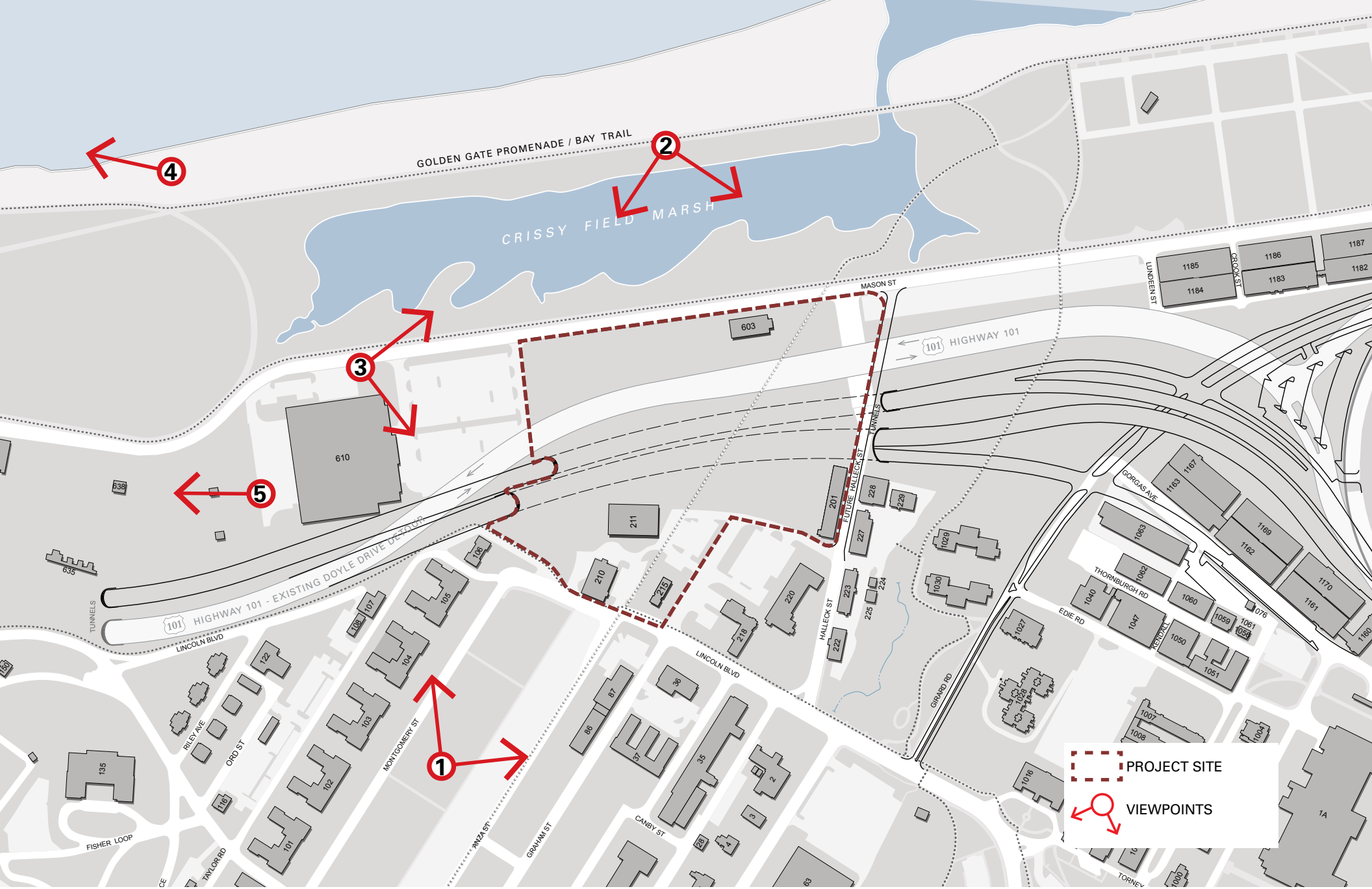
IMPORTANT VIEWS

Views of the project site from selected important viewpoints are shown in Figure 9. These viewpoints were chosen because they are representative of many potential viewpoints in the project area that were considered for this analysis. Potential changes to the visual character of the setting and important views would be most apparent from the selected viewpoints. The views from other nearby public spaces (e.g., Torpedo Wharf, Crissy Field, Golden Gate Promenade) were either similar to those represented, or were obstructed by intervening vegetation or structures. Similarly, the views from more distant public spaces (e.g., Crissy Field Overlook, Golden Gate Bridge) featured a project site indistinct from and subordinate to other development along Mason Street, the Presidio's interior, and the densely developed city beyond. The project site is not visible from Inspiration Point Overlook. As shown in the figure and discussed below, two representative viewpoints were selected for this analysis.

Important viewpoints are public locations in the project area that are frequented by the public and offer views of the project site as seen in the foreground or middleground of a larger landscape. Views from these locations feature the project site in the context of the surrounding landscape, providing a basis for understanding how changes within the project site may affect the visual character of the setting and important views in the project area.

View From Main Parade Facing Northeast

Views to the northeast from the Main Parade include the broad, gently sloping and neatly manicured lawn of the Main Post parade grounds. The Presidio Parkway perimeter fencing and newly-constructed tunnel tops are visible along the nearfield horizon and are most apparent as viewed from the north portion of the Main Parade. Vertical structures of the Main Post frame the grounds and parking area to the east and west, but to the north they open up to sweeping views of the San Francisco Bay and silhouettes of rugged Marin ridgelines that dominate the horizon. The easternmost extent of these views is partially obscured by the project site's Buildings 603, 210, 211, 215, and 201. The mainly passive users



9 IMPORTANT VIEWPOINTS

of the Main Parade (e.g., picnickers, small event attendees) could be somewhat sensitive to project area landscape changes from this viewpoint.

View From Bay Trail/Mason Street Facing Southeast

Views of the project site from the Bay Trail along Mason Street are partially obstructed by Building 610 and the ornamental street trees lining the south side of Mason Street. From this vantage point, the sparsely vegetated right-of-way and Building 610 parking lot islands are prominent in the foreground. Between the parking lot's mature trees and light posts, the northernmost Presidio Parkway tunnel is visible. The exposed form and mass of the tunnels creates a distinct horizontal divide between the foreground and background landscapes. The partially obscured white walls and red roofs of Buildings 211 and 201 are visible beyond the tunnel tops. These buildings are dominant structural elements of the horizon. A small fringe of the San Francisco skyline is visible on the distant horizon, but is subordinate to the project site's structures. The mainly active users of the Bay Trail/Mason Street (e.g., walkers, runners, bicyclists, motorists) would have low to moderate sensitivity to project site landscape changes from this viewpoint; their views would be fleeting as they pass the project site.

Would the proposed project any of the alternatives degrade the visual character of the setting, be incompatible with the existing natural or structural elements of the setting, or obstruct important views?

ALTERNATIVE 1 – PRESIDIO TRUST MANAGEMENT PLAN UPDATE

Under Alternative 1, the coastal terrace bluff would be recreated to the north of the Presidio Parkway tunnels. In keeping with the bluff's natural transverse gradient, the steepest slopes would be along the project site's western edge and descend gradually towards the east. Building 201 would be returned to the site of the original building. Upon completion of construction, the project site would consist of a largely undifferentiated landscape planted with predominantly native vegetation. Several pedestrian connections would be provided between the Main Post and Crissy Field, two of which would extend the formal northeast-southwest corridors that frame the Main Parade and parking lot (Anza Esplanade and Montgomery Street) through the project site to Mason Street.

View From Main Parade Facing Northeast

Viewed from the Main Parade, the visual character of the project site would continue to be defined by the consistent built edge of Main Post buildings to the west, a diversity of architectural styles unified by a consistent red and white color scheme, and a neatly-manicured and gently-sloping Main Parade that gives way to views of the San Francisco Bay and Marin County hillsides beyond. Under Alternative 1, Building 211 would remain and continue to block views of the bay and distant hillsides to the east. Users of the Main Post would observe a landscape transition from the lawns of the Main Parade at the project

The analysis of effects is presented primarily through narrative description. Where available, the analysis relies upon visual simulations. The simulations are not intended to represent life-like appearances of structures or vegetation, but rather to provide basic information regarding the general character of the project site under a given alternative. Simulations were not prepared for each alternative. Rather, the simulations depict the alternative with the most substantial change, as viewed form the most important viewpoints.

The Trust follows PTMP planning principles for scenic and recreational resources and PTMP guidelines for open space/vegetation/views to ensure that building and site changes made to accommodate new uses are compatible with the visual setting and protect the integrity of designed landscape areas, including the project site.

site's southern boundary to predominantly native plantings along the tunnel tops. The finished grade of the project site west of Buildings 210 and 211 would be increased from the existing tunnel tops height by at least four feet, the expected minimum depth of soil to support native plantings. The design would also include several new trees and shrubs. The increased elevation of the finished grade would raise the near-field horizon, thereby removing from view a small band of the San Francisco Bay. The addition of trees above and inland of the tunnels could also limit bay views to the northwest from portions of the Main Post. Through conformance with the supplemental design guidelines (Attachment 4), this potential adverse impact would be minimized. The overall effect on visual resources as viewed from the Main Parade would be beneficial.

View From Bay Trail/Mason Street Facing Southeast

Viewed from the Bay Trail along Mason Street, the visual character of the project site would continue to be influenced by Crissy Field Marsh to the north and Mason Street buildings to the south. The recreated bluff would evoke the form of the historic bluff between the Main Post and Crissy Field, providing a more naturalistic complement to the restored Crissy Field Marsh to the north. Alternative 1 would improve the visual character of the project site by covering exposed tunnels and revegetating staging areas. The removal of ornamental street trees and addition of low-lying native plantings throughout the project site would allow for clearer views of the project site and enhance visual connectivity among Mason Street buildings. These landscape changes would be compatible with the existing natural and structural character of the setting. The shift in Building 201 to its permanent location west of Halleck Street could make the structure appear more prominent on the nearfield horizon. Nevertheless, because the building's style, massing, and coloring are consistent with other buildings in the Main Post and along Mason Street, this move would not degrade or be incompatible with the existing visual setting. The relocated Building 201 and existing Building 211 would appear as breaks in an otherwise mostly continuous tree line along the southern far-field horizon; although, views of the building may be partially screened by landscaping proposed for areas to the northwest of these structures. Neither building would block any existing important views. The effect of Alternative 1 on visual resources as viewed from the Bay Trail/Mason Street would be beneficial.

ALTERNATIVE 2 – PRESIDIO PARKWAY

Under Alternative 2, the physical form of the recreated bluff would be as described for Alternative 1, and Building 201 would be returned to its permanent location. Upon completion of construction, the project site would consist of a more diverse landscape comprised primarily of gardens, lawns, and more formalized areas (e.g., plaza and promontory) for visitors to gather compared with Alternative 1. The extent of native plantings would be reduced relative to Alternative 1, and generally limited to the bluff and coastal plain portions of the project site. Trees would be more dispersed under this alternative. As with Alternative 1, pedestrian pathways between the Main Post and Crissy Field would be numerous and include an extension of the Anza Esplanade through to Mason Street, but would be more varied

and include opportunities for viewing the bay from designated overlooks and interacting with the park through interpretive features.

View From Main Parade Facing Northeast

As with Alternative 1, when viewed from the Main Parade, the visual character of the project site would remain intact, and continue to be defined by the Main Post's building orientations, diverse architectural styles with uniform colors, manicured lawns, and bay views beyond. Building 211 would continue to obstruct views of the bay and distant hillsides to the east. However, rather than appearing as native plantings, the project site would have a more unique identity which would be established through greater diversity in the height, color, and texture of vegetation; clearer delineations among landscaped and non-landscaped areas; and greater variation in the widths and directions of access pathways than under Alternative 1. Relative to Alternative 1, the visual character of the project site would be improved. While the character of the project site would be more distinct under Alternative 2, its transition to a more differentiated landscape would be more gradual relative to Alternative 1, and would complement the existing setting's natural and structural elements. As with Alternative 1, the project site's finished grade over the tunnel tops would encroach upon nearfield bay views. However, with fewer trees proposed for bluff top and inland areas under Alternative 2, the horizontal encroachment would not be as noticeable and expansive blue-water views would remain. Through conformance with the supplemental design guidelines (Attachment 4), this potential adverse impact would be minimized. The overall effect on visual resources as viewed from the Main Parade would be beneficial.

View From Bay Trail/Mason Street Facing Southeast

Similar to Alternative 1, when viewed from the Bay Trail along Mason Street, Crissy Field Marsh, Mason Street Buildings, and the recreated bluff would remain the defining elements of the project site under Alternative 2. The native plantings of varied heights along Mason Street would also provide a naturalistic complement to the restored Crissy Field Marsh to the north. Compared to Alternative 1, the addition of lawns, terraces and gathering areas, and greater pedestrian connectivity would give the project site a more distinctive and complex appearance. Under Alternative 2, the composition of lawns, native plantings, sinuous pedestrian pathways, and varied topography would be compatible with the existing natural and physical elements of the project site's setting; one or more of these elements is represented in Crissy Field, Crissy Field Marsh, and East Beach picnic area. With greater variation in vegetation heights, the visual connectivity among Mason Street Buildings and through the project site to the buildings and vegetation of the Main Post may not be as strong under Alternative 2. With the addition of lawn on the coastal plain and fewer bluff top trees under this alternative, the relocated Building 201 and existing Building 211 would feature more prominently in views to the south from the Bay Trail/Mason Street than under Alternative 1. However, for the reasons described for Alternative 1, these changes would not degrade the visual character of the setting, be incompatible with its natural or physical

elements, nor would the buildings block important views. The effect of Alternative 2 on visual resources as viewed from the Bay Trail/Mason Street would be beneficial.

ALTERNATIVE 3 (PROPOSED PROJECT) – NEW PRESIDIO PARKLANDS

Under Alternative 3, the physical form of the recreated bluff would be as described for Alternative 1, and Building 201 would be moved to its permanent location. However, unlike Alternative 1, Building 211 would be removed and a similarly sized structure (New Observation Post) would be added to the bluff top terrace portion of the project site (inland of the tunnels). In addition, two new structures (the Field Station and the Classroom building) would be added to the coastal plain portion of the project site (inland of Mason Street). Upon completion of construction, the project site would consist of a more diverse landscape comprised primarily of gardens, lawns, dunes and the Learning Landscape. The extent of native plantings would be reduced relative to Alternative 1, but greater than Alternative 2, and generally limited to the bluff and lower portion of the project site. Pedestrian access would favor more sinuous pathways over the more direct linear pathways representative of the Main Post, as reflected in Alternative 1.

View From Main Parade Facing Northeast

As with Alternative 1, when viewed from the Main Parade, the visual character of the project site would remain intact and continue to be defined by the Main Post's building orientations, diverse architectural styles with uniform colors, manicured lawns and bay views beyond. However, as illustrated in Figure 10, the project site would have a more unique identity than under Alternative 1, which would be established through greater diversity in the height, color, and texture of vegetation; clearer delineations among landscape types; and greater variation in the widths and directions of access pathways. While the character of the project site would be more distinct under Alternative 3, its transition to a more differentiated landscape would be similar to that of Alternative 1, with gardens and meadows softening the transition to the less formal native bluff top plantings. The New Observation Post would be similar in size to the existing Observation Post and would not be conspicuous, if even visible, from the Main Parade. Given the design of the new structure would be required to follow the supplemental design guidelines, these landscape changes would be compatible with the existing setting's natural and structural elements. As with Alternative 1, the project site's finished grade over the tunnel tops would encroach upon nearfield bay views. However, with no trees proposed west of Building 210 and with removal of Building 211, this horizontal encroachment would not be noticeable and the range of views from the Main Parade to the west would be improved relative to Alternatives 1 and 2. The removal of Building 211 would similarly improve opportunities to view the bay and distant hillsides to the east; the New Observation Post would not obstruct these views. The impact of Alternative 3 on visual resources as viewed from the Main Parade would be beneficial.

10 VIEW FROM MAIN PARADE FACING NORTHEAST

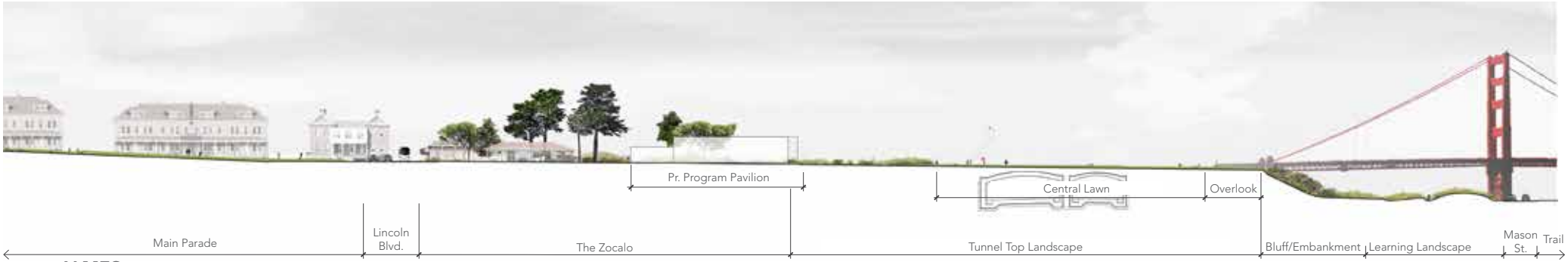
View From Bay Trail/Mason Street Facing Southeast

Similar to Alternative 1, when viewed from the Bay Trail along Mason Street, Crissy Field Marsh, Mason Street Buildings, and the recreated bluff would remain the defining elements of the project site under Alternative 3. Relative to Alternative 1, the dune vegetation proposed for the portion of the project site along Mason Street would be more consistent with the heights, colors, textures of the dune scrub vegetation associated with the restored Crissy Field Marsh to the north. Compared to Alternative 1, the dune vegetation, learning landscape, and gathering areas would give the project site a more distinctive and complex appearance. The pedestrian pathways (namely the bluff-face stairs connecting the Western Overlook to the Learning Landscape) would be more prominent than under Alternative 1. As shown in Figure 11, new structural elements within and adjacent to the Learning Landscape, including the Field Station and new Classroom building, would be partially screened by the dune vegetation of the Learning Landscape, and would be subordinate in height and mass to nearby existing structures. The topographic relief within the Learning Landscape would further screen these buildings from view as shown in Figure 12. While the proposed buildings would be newer than their historic Mason Street and Main Post counterparts, their designs would be required to conform to the supplemental design guidelines. And so while the Alternative 3 landscape would include more and newer development than under Alternative 1, the proposed landscape changes would generally be in keeping with the existing natural and physical elements of the coastal plain setting. As with Alternative 1, the absence of tall vegetation would allow for stronger visual connectivity among Mason Street buildings and through the project site to the buildings and vegetation of the Main Post. In contrast to Alternative 1, the removal of Building 211 would improve views from Mason Street towards the Main Post, removing a visual break in an otherwise mostly continuous tree line along the southern far-field horizon. In the absence of vegetative screening under Alternative 3, this break in the far-field horizon would remain with the moved Building 201. As the proposed new vertical structures would be smaller than and set back behind Building 603, these structures would not result in the obstruction of important views relative to Alternative 1. The effect of Alternative 3 on visual resources as viewed from the Bay Trail/Mason Street would be beneficial.

CONCLUSION

Under all alternatives, the visual character of the project site would be maintained and improved through covering of the exposed tunnels, revegetating staging areas, and recreating the bluff. Proposed developments under Alternatives 1 and 2 would be limited to landscape design changes, and would generally be compatible with the existing natural and structural elements of the setting. Given their relatively small bulks, heights, and masses, and through adherence to established design guidelines, the new structures proposed under Alternative 3 would also be compatible with the natural and structural elements of the setting. Landscape modifications under Alternatives 1 and 2, namely the planting of new trees along the project site's southwestern edge could block bay views from the Main Parade. The absence of tall vegetation and removal of Building 211 in Alternative 3 would have a beneficial effect on bay views, relative to Alternative 1.

11 VIEW FROM BAY TRAIL/MASON STREET FACING SOUTHEAST



JAMES CORNER FIELD OPERATIONS

12 CROSS SECTION VIEW

LIGHT AND GLARE

The starry night sky and natural darkness are important components of the Presidio. The park is one of the remaining harbors of darkness in San Francisco and provides a rare opportunity for the public to experience this diminishing resource in an urban area. Crissy Field's natural lightscape is critical for nighttime scenery and for maintaining nocturnal habitat. Many wildlife species found at Crissy Field rely on natural patterns of light and dark for navigation, to cue behaviors or hide from predators.

Light pollution means any adverse effect of artificial light including, but not limited to, glare, light trespass, skyglow, energy waste, compromised safety and security, and impacts on the nocturnal environment (Illuminating Engineering Society 2011).

The project site's nighttime lightscape environment is generally dark now that nighttime lighting for construction of the Presidio Parkway is no longer required, with considerable lighting influence from sources beyond the project site, including the Golden Gate Bridge and the San Francisco skyline. In the project area, detectable sources of lighting include Main Post building security and street lighting, and the headlights of vehicles traveling along Lincoln Boulevard and Mason Street. Sources of nighttime lighting within the project site are generally limited to parking lot, building entry and interior lighting.

The PTMP addresses the protection of the nighttime environment in the park, and seeks to minimize the intrusion of light in natural areas to protect wildlife. The Trust's Standard Measures for Lighting direct Trust staff to manage and preserve the natural night sky by:

1. Using light only where needed;
2. Using light only when it is needed;
3. Using the minimum amount of light necessary;
4. Using minimal-impact lighting techniques; and
5. Employing energy conservation measures.

Application of these guiding principles to the parklands project is especially important to prevent the disturbance of ecological processes and degradation of scenic values of the future Quartermaster Reach located directly east of the project site and the nearby Crissy Field Marsh.

Would the proposed project or the alternatives create light pollution?

ALL ALTERNATIVES

Exterior lighting associated with the alternatives is not anticipated to greatly alter the baseline lighting environment of the project area. The Mid-Crissy Design Guidelines (Presidio Trust 2011b) that apply to the project site would require exterior lighting be designed to minimize light pollution. Code-required lights would be installed where egress, accessibility, and personal safety are principal concerns. Tall

pole lights would only be used where area safety and task lighting is required, such as along Mason Street and in parking lots, as project conditions warrant. Lighting would be path-level and limited to the primary circulation spaces, primary gathering spaces and site edges and entrances. Under Alternative 3, path-level lighting would be energy efficient luminaires and LED lighting focused around primary spaces:

- Anza Esplanade
- The Zocalo
- Youth Center (secure zone), and
- Bluff Pedestrian Ramps and Stairs

And secondary pathways and spaces:

- East-west diagonal path connecting Building 106 to the Zocalo
- The Cliff Walk
- The Overlooks, and
- A primary pathway in the Learning Landscape

All lights would be high efficiency, low glare, downcast and shielded fixtures per the current California Building Energy Efficiency Standards California and LEED V2.2 guidelines for new lighting (for which dark sky preservation is a rewarded achievement). No uplighting or event searchlights would be permitted. The Trust would review both the interior and exterior lighting designs to ensure consistency with PTMP policies regarding light and with guiding principles set forth in the Trust's Standard Measures for Lighting. Best lighting practices would be reviewed, including use of backlight, uplight and glare (BUG) ratings and photometric analyses, to avoid light trespass into adjacent natural areas.

CONCLUSION

New lighting associated with the proposed project or alternatives would be consistent with PTMP lighting policies and the Trust's guiding principles for lighting. Through evaluation of lighting techniques and lighting technology, the personal safety of visitors would be addressed while avoiding the adverse impacts of light pollution, including those on the Presidio's night sky or adjacent natural areas.

BIOLOGICAL RESOURCES

The Presidio supports a diverse array of natural communities as well as plant and animal species within the larger urban landscape of the City of San Francisco. Coastal salt marsh, arroyo willow riparian forest, coast live oak woodland, serpentine scrub, dune scrub, wetlands, and historic forests of Monterey cypress (*Hesperocyparis macrocarpa*) and blue gum eucalyptus (*Eucalyptus globulus*), among other communities, persist within the Presidio's open space. Common and special-status plant and animal species also are documented in these specialized environments. The natural communities within the project area include the restored Crissy Field Marsh and associated native plant communities of coastal salt marsh and dune scrub located across Mason Street to the north, and the Tennessee Hollow Creek corridor with riparian and coastal scrub communities located across Halleck Street to the east of the project site. The project site is located within a designed, landscaped area of the Presidio, or areas recently disturbed during construction of the Presidio Parkway. Native vegetation and wildlife associated with the natural communities within Crissy Field Marsh and Tennessee Hollow are more diverse than the managed communities of the project site.

VEGETATION COMMUNITIES AND WILDLIFE RESOURCES WITHIN THE PROJECT AREA

While the greater Presidio contains approximately 171 acres of remnant or restored native plant communities, none occur within the project site. The entire project site falls within the Vegetation Management Plan (VMP) Landscape Vegetation Zones (VMP Figure 3, page 21). Vegetation within the project site is limited to exotic landscaping and a small stand of Monterey cypress trees. While such environments offer limited habitat value, they still provide cover, foraging and nesting habitat for a variety of bird species, as well as amphibians, reptiles and small mammals, especially those that are tolerant of disturbance and human presence.

Landscaped Vegetation

The southern portion of the project site is landscaped with a variety of ornamental trees, shrubs and maintained non-native grass lawns supplemented with some native species. Marina strawberry tree (*Arbutus marina*), crimson bottlebrush tree (*Callistemon citrinus*), Canary Island date palm tree (*Phoenix canariensis*), Kusamaki tree (*Podocarpus macrophyllus*) and a few pines (*Pinus* spp.) occur in this area, among shrubs of Australian cheesewood (*Pittosporum undulatum*), Japanese cheesewood (*Pittosporum tobira*), manzanita (Manzanita sp.) and hebe azure (*Hebe speciosa*), and with an understory of star jasmine (*Trachelospermum jasminoides*), rock rose (*Cistus salviifolius*) and native beach strawberry (*Fragaria chiloensis*).

Birds commonly found in such areas include non-native English sparrow (*Passer domesticus*) and European starling (*Sturnus vulgaris*), as well as birds native to the area such as American robin (*Turdus migratorius*), house finch (*Haemorhous mexicanus*), dark-eyed junco (*Junco hyemalis*), Brewer's blackbird

(*Euphagus cyanocephalus*), western scrub jay (*Aphelocoma californica*), mourning dove (*Zenaida macroura*), American crow (*Corvus brachyrhynchos*), common raven (*Corvus corax*), California towhee (*Melozone crissalis*), northern mockingbird (*Mimus polyglottos*), bushtit (*Psaltriparus minimus*) and Anna's hummingbird (*Calypte anna*). White-crowned sparrows (*Zonotrichia leucophrys*) are fairly prolific throughout the Presidio and may also occur in the project site.

Reptiles using this type of habitat may include native species such as western terrestrial garter snake (*Thamnophis elegans*) and western fence lizard (*Sceloporus occidentalis*). Amphibians commonly found in this type of habitat include California slender salamander (*Batrachoseps attenuatus*), yellow-eyed ensatina salamander (*Ensatina eschscholtzii xanthoptica*), and the arboreal salamander (*Aneides lugubris*). Mammals typically associated with such landscaped areas include striped skunk (*Mephitis mephitis*), raccoon (*Procyon lotor*), Virginia opossum (*Didelphis virginiana*), as well as Botta's pocket gopher (*Thomomys bottae*) and other small rodents. Coyotes (*Canis latrans*) are routinely sighted in the Presidio and could appear within the project site on a transient basis.

Monterey Cypress Forest

A small forest stand consisting of five Monterey cypress (*Hesperocyparis macrocarpa*) trees, native to California but not native to the San Francisco area, occurs west of the Transit Center (Building 215) within the project site. The Monterey cypress trees may host a variety of bird and bat species that nest or roost in the bark and branches of the mature trees. Avian species common to cypress forest include native species such as American robin, chestnut-backed chickadee (*Poecile rufescens*), pygmy nuthatch (*Sitta pygmaea*), red-breasted nuthatch (*Sitta canadensis*), brown creeper (*Certhia americana*), downy woodpecker (*Picoides pubescens*), purple finch (*Haemorhous purpureus*) and tree swallow (*Tachycineta bicolor*). Raptors common to the Presidio such as red-shouldered hawk (*Buteo lineatus*) and red-tailed hawk may nest in the upper branches. Tree-roosting bats that might occur in the Monterey cypress forest include western red bat (*Lasiurus blossevillii*), Mexican free-tailed bat (*Tadarida brasiliensis*) and little brown myotis (*Myotis lucifugus*). Amphibians commonly found in this type of habitat include California slender salamander (*Batrachoseps attenuatus*), yellow-eyed ensatina salamander (*Ensatina eschscholtzii xanthoptica*) and the arboreal salamander (*Aneides lugubris*).

Coastal Salt Marsh

Across Mason Street from the project site, Crissy Field Marsh is a restored 18-acre tidal salt marsh with fringe vegetation dominated by native pickleweed (*Salicornia pacifica*), saltgrass (*Distichlis spicata*), alkali heath (*Frankenia salina*), fleshy jaumea (*Jaumea carnosa*) and marsh gumplant (*Grindelia stricta* var. *angustifolia*) with California sea lavender (*Limonium californicum*), salt marsh sand spurrey (*Spergularia marina*) and salt marsh dodder (*Cuscuta pacifica* var. *pacifica*). The open water and mudflats of the marsh provide valuable foraging and roosting areas for both resident and migratory birds. Common species that frequent the mudflats or fringe vegetation of the marsh include great blue heron (*Ardea herodias*), great egret (*Ardea alba*), snowy egret (*Egretta thula*), yellow legs (*Tringa* spp.), long-billed curlew

(*Numenius americanus*), whimbrel (*Numenius phaeopus*), western sandpiper (*Calidris mauri*), western gull (*Larus occidentalis*), ring-billed gull (*Larus delawarensis*) and California gull. Common loon (*Gavia immer*), Caspian tern (*Hydroprogne caspia*), double-crested cormorant (*Phalacrocorax auritus*), brown pelican (*Pelecanus occidentalis*), ruddy duck (*Oxyura jamaicensis*), scaup (*Aythya* spp.), bufflehead (*Bucephala albeola*), pied-billed grebe (*Podilymbus podiceps*), eared grebe (*Podiceps nigricollis*) and aechmophorus grebes (*Aechmophorus* spp.) among many others are seasonally present. The marsh is also frequented by a variety of fish species including but not limited to leopard shark (*Triakis semifasciata*), threespine stickleback (*Gasterosteus aculeatus*), and a variety of gobies (*Gobidae*).[12]

Dune Scrub

Just above the salt marsh plants, sandy soils support native foredune vegetation comprised of beach strawberry (*Fragaria chiloensis*), sand verbena (*Abronia* spp.), beach evening primrose (*Camissoniopsis cheiranthifolia*), dune knotweed (*Polygonum paronychia*) and beach morning-glory (*Calystegia soldanella*). Larger woodier plants that occur upland of the low-growing dune species include coyote bush (*Baccharis pilularis*), dune bush lupine (*Lupinus chamissonis*), lizard tail (*Eriophyllum staechadifolium*), coast buckwheat (*Eriogonum latifolium*), California coffee berry (*Frangula californica*) California sage (*Artemisia californica*) and sticky monkey (*Mimulus aurantiacus*). Dune scrub supports northern alligator lizard (*Elgaria coerulea*), southern alligator lizard (*Elgaria multicarinata*), western fence lizard (*Sceloporus occidentalis*) and gopher snakes (*Pituophis catenifer*); small rodents such as deer mouse (*Peromyscus maniculatus*), vagrant shrew (*Sorex vagrans*) and California vole (*Microtus californicus*); and a variety of birds including white-crowned sparrow, song sparrow (*Melospiza melodia*), Bewick's wren (*Thryomanes bewickii*), fox sparrow (*Passerella iliaca*), California towhee, common bushtit and house finch.

Arroyo Willow Riparian Scrub

The Tennessee Hollow Creek is currently contained within a 72-inch pipe connected to the south eastern portion of Crissy Field Marsh. However, the topography of the natural drainage corridor remains and is densely vegetated with native arroyo willow (*Salix lasiolepis*) and a combination of native California blackberry (*Rubus ursinus*) and non-native Himalayan blackberry (*Rubus armeniacus*). Arroyo willow stands also occur in the upland areas of Crissy Field Marsh near the west end. Arroyo willow riparian scrub provides foraging opportunities and cover a variety of mammals such as common raccoon (*Procyon lotor*) and Virginia opossum as well as for resident and migratory birds, including many species already discussed in addition to San Francisco common yellowthroat (*Geothlypis trichas sinuous*), lesser goldfinch (*Spinus psaltria*), American goldfinch (*Spinus tristis*), ruby-crowned kinglet (*Regulus calendula*), green heron (*Butorides virescens*), western kingbird (*Tyrannus verticalis*) and warbling vireo (*Vireo gilvus*). The creek also supports threespine stickleback fish (*Gasterosteus aculeatus*).

[12] Note: does not include the federally-listed tide water goby (*Eucyclogobius newberryi*).

SPECIAL-STATUS SPECIES

Special-status species, their status, their habitat requirements, plant blooming periods, and the potential for each species to occur within the project area and the project site are provided in Attachment 5. Many of the species occur in the restored natural communities of the project area and do not occur within the project site boundaries.

No special-status plants occur within the project site due to the highly managed nature of the current vegetation communities (e.g., manicured lawns and exotic landscaping) and otherwise developed or highly disturbed areas. No special-status plants that occur in the greater project area will be disturbed by the project in ways that might compromise their survival.

Only the olive-sided flycatcher (considered a species of special concern by CDFW), other resident and migratory birds, and special-status bats have a moderate potential to occur within the project area and could be affected either directly or indirectly by the project.

Olive-Sided Flycatcher

The olive-sided flycatcher (*Contopus cooperi*) is often observed during the breeding season singing fairly continuously throughout the day from a perch on the highest branch of a tree. Olive-sided flycatchers breed in the Presidio and will build a cup nest in the outer branches of a mature tree, conifer trees preferred. The Monterey cypress and taller landscaped trees of the project site provide suitable habitat for this species.

Resident and Migratory Birds

The San Francisco Peninsula is an important migratory stopover for birds along the Pacific Flyway (one of the four major migratory routes in North America). Raptors, songbirds, shorebirds and waterfowl stopover in the Presidio during their fall and spring migrations as its diverse natural communities offer suitable and attractive habitat for birds to forage and rest along this migration route. Several resident and migratory birds could nest within or adjacent to the project site in trees, shrubs and buildings. Several raptors are known to nest in the Presidio's mature trees, including red-tailed hawk, red shouldered hawk, American kestrel (*Falco sparverius*), Cooper's hawk (*Accipiter cooperii*) and great horned owl (*Bubo virginianus*). The federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code protect raptors and most native migratory birds and breeding birds.

Special-Status Bats

Special status bats potentially occurring within the project site and project area include the western red bat (*Lasiurus blossevillii*), hoary bat (*Lasiurus cinereus*) and Yuma myotis (*Myotis yumanensis*). Suitable roosting habitat for these bats includes tree foliage, underneath the exfoliating bark of trees, tree cavities, and for the Yuma myotis, open spaces within buildings. Each of these species has been

documented during surveys of the Presidio and were more commonly encountered near areas with open water for foraging insects (Krauel 2009). Bats could be present seasonally in any of the buildings at the project site, or in tree foliage, in tree cavities, or under the loose, peeling bark of trees within the project area.

WETLANDS AND OTHER WATERS OF THE U.S.

While wetlands and other waters of the U.S. occur within the Presidio, none are present within the project site.

Would the proposed project or any of the alternatives adversely affect any sensitive habitat community, or special-status species or its habitat?[13]

ALL ALTERNATIVES

The new parklands would affect areas that are already developed, landscaped, or previously disturbed by the Presidio Parkway project. Following completion of the Presidio Parkway and prior to implementation of the alternatives, disturbed areas of the project site would be vulnerable to colonization by non-native or invasive plant species. Disturbed areas would be treated with broadcast seed mixture and mulch or a hydroseed mixture approved by the Trust immediately following construction; however, formal revegetation or restoration of the project site would be phased over several years. Over this time, such undesirable weedy vegetation may become well established. Additionally, seeds of non-native or invasive plants could be introduced to the project site on visitor clothing or vehicles during this interim period and on equipment or machinery during construction. The Trust would employ strategies identified in VMP Mitigation Measure NP-1 *Invasive Exotic Plant Species*, which would prevent the spread of non-native or invasive vegetation in the project site. With implementation of these measures, potential effects related to the spread of non-native and invasive plants would be minor and adverse.

Proposed construction activities would generally have short-term minor impacts on biological resources given the marginal habitat value associated with the project site's existing conditions and minimal indirect disturbance to biological resources in adjacent areas, such as Crissy Field Marsh. In the long term, the parklands project would be beneficial to biological resources in the project area, regardless of the selected alternative, all of which provide for revegetation[14] or restoration of recently disturbed areas. All alternatives would establish the appropriate native vegetation or the appropriate ornamental

[13] No special-status plants or sensitive natural communities, including jurisdictional wetlands, occur within the project area. As a result, the project would have no effect on these resources. Therefore, these items are not discussed further.

[14] All revegetation would be completed in accordance with the Vegetation Management Plan (Trust and NPS 2001) and standard NPS and Trust restoration practices such as using locally native plant material, protecting and restoring soil conditions, irrigating, and controlling aggressive non-native species (Doyle Drive EIS/R, pages 3-234 and K-8).

vegetation in proposed landscaped areas, each providing foraging opportunity and cover to wildlife and contributing to the overall vegetated landscape of the Presidio. The Vegetation Management Plan prescribes plant lists for landscaped areas that consider a species' historical use in the Presidio, long term maintenance needs, and invasive tendencies. Designed landscapes are planted with species appropriate to the Presidio based on historical record, reference sites for community composition, and site conditions. Native plants are propagated from Presidio stock within the native plant nursery to protect locally distinct genetic types.

Throughout construction of the Presidio Parkway, avian response to project-related noise was monitored in the Presidio on a quarterly basis according to the Doyle Drive BMP (Measure 3.6.1), which resulted in 21 monitoring events between November 2009 and May 2015. Based upon monitoring reports from this period, no long-term behavioral disturbance associated with the Presidio Parkway project noise environment was observed at either the Crissy Field Marsh or forested monitoring locations along the construction corridor. Short-term discrete noise response, such as flushing to the sound of an engine backfire, were infrequent. Give the lack of observed adverse effects of construction noise on Presidio birds, continued monitoring of avian response to parklands project-related noise was determined unnecessary.

ALTERNATIVE 1 – PTMP UPDATE ALTERNATIVE

Under Alternative 1, resident and migratory birds that nest in the project area could be disturbed by project construction activities such as removal of existing vegetation, ground disturbance, an elevated noise environment, and increased human presence. Any of these activities in the vicinity of an active bird nest could cause nest abandonment by an adult or direct take of a nest, eggs, or nestlings. Under this alternative, the Trust would undertake pre-construction nesting bird surveys performed per PTMP Mitigation Measure NR-9 *Wildlife and Wildlife Habitat*, which would identify active nests in the project area and that could be affected by construction and establish protective measures around nests to facilitate nest success.

Common and special-status bat species of the Presidio could roost in mature trees, such as the Monterey cypress near Building 215, and in vacant or underused buildings of the project site, such as Building 201. Disturbance to buildings or vegetation occupied by roosting bats could cause adverse impacts during periods of inactivity when bats are most vulnerable. These periods include maternity roosting season (May 1 – September 15) or winter torpor (October 15 – February 28); although, winter hibernation is less common in San Francisco's mild climate. Disturbance to maternity roosts could cause female bats to abandon pups or could result in direct mortality of special-status bats at maternity roosts and disturbance to a hibernation roost could take adult bats. The Trust would implement pre-construction surveys for bat roosts per PTMP Mitigation Measure NR-9 *Wildlife and Wildlife Habitat*, which would identify in-use roosts sites in the project area that could be affected by construction and establish avoidance measures to protect roosts or determine appropriate methods for roost relocation.

Short-term impacts on other resident wildlife could include some direct loss of small or less mobile species common to the Presidio, such as small mammals, reptiles, amphibians and invertebrates. However, this alternative would generally offer long term benefits to such wildlife by revegetating areas disturbed by the Presidio Parkway project and increasing the total area of available habitat within the Presidio. The Trust would revegetate 7.7 acres of the project site with predominantly native plants of a coastal scrub or dune scrub community, consistent with vegetation natural to the adjacent bluffs and surrounding Crissy Field Marsh. Consistency between the vegetation communities in revegetated areas of the project site with that of adjacent naturalistic environments would provide more continuous wildlife habitat that could support greater population and diversity of species. Native plant communities tend to support local, specialized invertebrate, avian and mammal pollinators, and are more viable communities to host rare or special-status plants; expanding these communities within the project site would provide opportunities for establishment of new populations of these species. The Trust would monitor and maintain restored areas of native vegetation per the management actions for landscape vegetation in the VMP.

ALTERNATIVE 2 – PRESIDIO PARKWAY ALTERNATIVE

Under Alternative 2, the potential effects on biological resources would generally be the same as described under Alternative 1. Similarly, under this alternative, the Trust would undertake the identified PTMP BMP measures. Relative to Alternative 1, the extent of native vegetation would be reduced (by 4.2 acres) and more fragmented among landscaped areas. Integrating amenities into the project design, such as a group fire pit, interpretive features and formalized gathering areas, would enrich the visitor experience and result in an overall greater public presence. In congested areas, visitors could step off the established paths and trample areas planted with, or colonized by native vegetation. Visitors could also challenge unencumbered uses by local wildlife that could otherwise occupy areas of the project site vegetated with native plantings. Fragmented, designed landscapes with less native plant cover, generally offer less habitat value to local wildlife and less opportunity for natural, contiguous ecosystems to establish between the project site and adjacent areas. Thus, the intended diverse visitor appeal of this alternative's key elements, coupled with reduced extent and continuity of native vegetation, would provide fewer benefits to local biological resources relative to Alternative 1. Management actions such as signage, protective fencing, and generous pathway sizing as described in the Visitation section and consistent with PTMP Mitigation Measure NR-5 *Wildlife and Native Plant Communities* would protect local wildlife and native plant cover within the project site and project area.

ALTERNATIVE 3 (PROPOSED PROJECT) – NEW PRESIDIO PARKLANDS

Under Alternative 3, the potential effects on biological resources would generally be the same as described under Alternative 1. Similarly, under this alternative, the Trust would undertake the identified PTMP BMP measures. Relative to Alternative 1, the extent of native vegetation would be reduced (by 3.4 acres) and more fragmented among landscaped areas. The sequence of vegetation plantings under Alternative 3 from dune to woodlands would mimic the natural progression of communities found elsewhere in the Presidio. However, increased visitor presence, more pedestrian pathways bisecting planting areas, and presence of specialized use areas along the northern and southern edges could deter wildlife use along the fringes of the various habitats types closest to public areas. Nevertheless, similar to existing densely vegetated but accessible areas throughout the Presidio, areas of native vegetation through the interior of the project site, particularly the band of coastal bluff scrub gardens[15] and the perennial grassland meadow, could become a viable supportive environment for both native wildlife and plants over time if left to naturally grow and evolve.

Under Alternative 3, any birds nesting or bats roosting in the vicinity of Building 211 during demolition and subsequent construction of the new buildings would be minimized through the Trust's implementation of the pre-construction surveys and avoidance measures described for these species under Alternative 1. Design features of the new buildings such as large windows or transparent walls, and additional lighting integrated into the new buildings and visitor amenities would increase potential adverse effects on local wildlife, such as birds and bats, relative to Alternative 1. Such effects could include collision fatality or injury, and disorientation associated with excessive light pollution.

Glass surfaces used to provide more natural lighting or to take advantage of views from the project site that are likely to be incorporated into new construction could result in increased bird collisions. Daytime collisions occur most often when birds fail to recognize window glass as a barrier. Collisions could be induced by night lighting of the building, which can be especially problematic for migrating songbirds since many are nocturnal migrants (Ogden, 1996). In addition, while exterior lighting associated with this alternative is not anticipated to greatly alter the baseline lighting environment of the project area (see Light and Glare), new lighting could contribute to adverse nighttime lighting effects on local or migratory wildlife. The Mid-Crissy Design Guidelines (Trust 2011b) would require exterior lighting to be designed to minimize light pollution and new building elements to incorporate bird-safe design standards that would apply to the new buildings and any interpretive features of the site. In addition, the Trust would pursue best bird-safe building practices such as those included in the City of San Francisco's Standards for Bird-Safe Buildings (San Francisco Planning Department 2011) and Standards for Bird-Safe Buildings Design Guide (SFPD 2012) to reduce collisions and minimize the potential for adverse nighttime lighting effects on local or migratory wildlife. The San Francisco design standards provide guidance regarding

It is estimated that between 365 and 988 million songbirds are killed annually in North America due to collisions with buildings and other structures (Loss et al. 2014). Collisions are currently recognized as one of the leading causes of bird population declines worldwide (Brown et al. 2007).

[15] The gardens proposed for Alternative 3 would use 21st century sustainable horticultural practices to increase their ability to support wildlife, pollinators and other beneficial insects.

the use and types of glass and façade treatments, and lighting treatments for buildings that present "location-related hazards" and/or "feature-related hazards" for birds on the wing.

CONCLUSION

There would be no effects on special-status plants or sensitive natural communities, including jurisdictional wetlands, as none occur within the project area. The Trust would implement measures identified in the PTMP ROD and VMP to avoid or minimize temporary adverse effects related to the spread of non-native and invasive plant species, resident and migratory birds, roosting bats, and other resident wildlife species during construction. The project site's wildlife habitat value would increase through native plantings in the designed landscape. The addition of buildings and new sources of lighting would increase the potential for adverse effects on resident and migratory birds. However, these potential effects would be minimized by implementing bird-safe treatments included in the Mid-Crissy Design Guidelines and City of San Francisco's standards and guidelines for bird-safe buildings.

WATER RESOURCES

WATER SUPPLY

The Trust operates a facility that treats water from Lobos Creek to provide potable water to the Presidio under permit from the California State Water Resources Control Board, Division of Drinking Water Programs. Supplemental water is purchased from the City and County of San Francisco (CCSF) as needed. Since 2012, CCSF has provided approximately 22 percent of the total water consumed at the park, and the remainder was provided by Lobos Creek. During this period, use of CCSF water ranged from 0 gallons per day in the winter and spring to 1 million gallons per day (mgd) at the peak of the dry season.

The San Francisco Public Utilities Commission (SFPUC), the CCSF department that provides water to San Francisco and surrounding communities, estimates that the current retail demand for water from its system is between 80 and 81 mgd (SFPUC 2011). The SFPUC identifies the Presidio as an "in-city customer/non-residential" and therefore historical water use and projected water demands of Area B are included in its Urban Water Management Plan (SFPUC 2005). These projections are based on the CCSF Planning Department's Land Use Allocation 2002 (CCSF 2003), which takes into account projected future development within the Presidio. Because the Trust is a retail customer, the purchase and use of water from the SFPUC is subject to its water shortage regulations, including mandatory water rationing programs and rate structures adopted during drought conditions.

The Trust is committed to reducing the demand for off-site potable water resources by conserving water. In response to the current drought, the Trust has implemented several water reducing measures

including reducing lawns where appropriate and employing a 3-tiered system for managing turf areas which regulates irrigation based on public use and visibility. As shown in Table 10, these measures have resulted in an 18 percent reduction in overall water usage and a 34 percent reduction in purchases from SFPUC, when compared to an average of the prior three years.

10 TOTAL WATER DEMAND COMPARISON (JANUARY-AUGUST)

Source	2012-2014 (Average)	2015	Percent Reduction
Lobos Creek	183.9	159.8	-13
SFPUC	59.5	39.0	-34
Total	243.4	198.8	-18

Source: Presidio Trust 2015
Units: million gallons

To further reduce impacts to potable supplies, the Trust has committed to implementing water recycling in the northern and eastern sections of the park (PTMP, page 55). The recycled water treatment plant, which will produce approximately 0.5 mgd, will be constructed once funding has been secured. The Trust has also been identified as a customer of the SFPUC's Westside Recycled Water Project, which will provide recycled water to the Presidio Golf Course, National Cemetery and Public Health District. The SFPUC expects to begin providing service in early 2019.

WATER QUALITY

The project site drains to San Francisco Bay. The west portion of the project site drains through Outfall F to Crissy Field Marsh, which outlets to the San Francisco Bay and the east portion of the project site drains through Outfall D to Crissy Field Marsh before discharging into San Francisco Bay. Following completion of the Presidio Parkway, stormwater in the east portion of the project site will make its way through the new Quartermaster Reach before discharging into San Francisco Bay. The Presidio Parkway project is subject to the design criteria set forth by the project's construction documents and will be documented in a turnover conditions agreement. The Presidio Parkway project is committed to maintaining similar hydrologic conditions to those that existed prior to tunnel construction.

The proximity of the project site to Crissy Field Marsh and the San Francisco Bay make erosion and sedimentation control practices critical. The Trust has implemented and is operating under the Presidio of San Francisco Stormwater Management Plan (SMP) (Dames & Moore 1994), which includes a detailed Storm Water Pollution Prevention Plan (SWPPP) that outlines erosion prevention and sedimentation control measures used to avoid contamination of storm drains and surface water resources. Structural

and operational stormwater pollution prevention measures, referred to as best management practices (BMPs), are developed and employed to reduce stormwater runoff volumes, protect water quality and meet water quality standards.

The PTMP EIS estimates the amount of net new construction (i.e. new construction less demolition) in the Presidio to determine changes in permeable surfaces and thus stormwater runoff (pages 335 through 341). The assessment did not account for the decrease in impervious surfaces and reduction in volume of stormwater runoff that would occur associated with conversion of the project site from pavement to more permeable materials. Nevertheless, the analysis determined that no additional demands or impacts on the district's stormwater systems are anticipated. PTMP ROD Mitigation Measure UT-7 *Stormwater Reduction* would require that infrastructure improvements be installed prior to new construction to minimize stormwater runoff and comply with existing water quality standards, regulatory requirements and the SMP.

Would the proposed project or alternatives increase demands on potable water supplies?

Table 11 compares current water usage with PTMP projections and presents changes in water demand resulting from the proposed project and alternatives. Irrigation demands were developed using the methodology included in the State's recently adopted Model Water Efficient Landscape Ordinance (California Department of Water Resources 2015). The ordinance promotes efficient landscapes in new developments and retrofitted landscape, and calls for increasing water efficiency standards through more efficient irrigation systems, recycled water usage, onsite stormwater capture, and by limiting the portion of landscapes that can be covered in turf.

ALTERNATIVE 1 – PRESIDIO TRUST MANAGEMENT PLAN UPDATE

Implementation of this alternative would not change the Presidio's water demands. The alternative includes approximately one acre of lawns and less than one acre of gardens. Irrigation demands resulting from these areas are taken into account in the PTMP projections. No new construction is included so there would be no changes to domestic demands. The alternative includes approximately 7.7 acres of predominately native plantings, which would not need irrigation beyond an initial establishment period. Therefore, there would be no long-term impact on water demands.

ALTERNATIVE 2 – PRESIDIO PARKWAY

Similar to Alternative 1, this alternative proposes no new construction so there would be no changes to domestic demands. This alternative also includes 4.2 acres of lawn and garden areas and 3.5 acres of predominately native plantings. While the native plantings would not increase water demands beyond initial establishment, the 4.2 acres of lawn and garden areas represent new irrigated areas. The change

11 WATER DEMAND SUMMARY

Alternative	Domestic Demand	Irrigation Demand				
	Average Daily	Average Daily	Off Peak	Peak Month	Demand Range	Annual Consumption
PTMP	0.713	0.502	0.101	1.212	0.814-1.925	445.4
Current (Average of 2012-2014)	0.363	0.560	0.180	1.100	0.543-1.463	336.2
Alternative 1	No Change	No Change	No Change	No Change	No Change	No Change
Alternative 2	No Change	0.009	0.005	0.016	0.005-0.016	3.4
Alternative 3	No Change	0.011	0.006	0.018	0.006-0.018	4.1

Source: Presidio Trust 2015
Units: Million Gallons per Day
Off Peak: Average demand from November through April
Alternative analysis represents changes from PTMP projections.

represents a 1.0 percent increase in annual consumption and 1.2 percent increase in peak month demand when compared to current Presidio-wide demands. The combination of current demands with projected increases from this alternative are well below PTMP projections.

ALTERNATIVE 3 (PROPOSED PROJECT) – NEW PRESIDIO PARKLANDS

This alternative proposes approximately 7,500 square feet of net new construction within the Crissy Field and Main Post districts. Water demands resulting from this construction are taken into account in the PTMP projections. This alternative also includes approximately 4.3 acres of predominately native plantings that would not need irrigation beyond an establishment period and would have no bearing on Presidio-wide water demands, similar to the other alternatives. This alternative also includes 3.8 acres of new irrigated areas consisting of approximately 1.3 acres of lawn area and 2.5 acres of other plantings. The change represents a 1.2 percent increase in annual consumption and 1.3 percent increase in peak month demand when compared to current demands. Similar to Alternative 2, the combination of current demands with projected increases from this alternative are well below PTMP projections.

To reduce water demands, the Trust would design, construct and maintain landscapes proposed within each of the alternatives in accordance with PTMP ROD Mitigation Measure UT-1 *Demand Management* which requires implementation of BMPs. BMPs include designing and constructing landscapes and irrigation systems to meet Trust irrigation guidelines, which include specific requirements for efficient and

effective water application, and accepting recycled water for irrigation when available. The proposed project would conform with the Trust irrigation guidelines, meet the provisions of the State's Model Water Efficient Landscape Ordinance, and achieve Trust sustainability goals.

"For the efficient use of water, a landscape shall be carefully designed and planned for the intended function of the project." – California Department of Water Resources (2015)

Would the proposed project or alternatives inhibit surface water drainage, alter the landscape topography, or lead to increased runoff or erosion?

ALL ALTERNATIVES

Impervious surfaces, including buildings, hardscapes and parking lots, within the 14-acre project site would range from about 1.9 acres under Alternative 1 (covering 14 percent of the project site) to 5.6 acres under Alternative 3 (covering 40 percent of the project site). Alternative 2 would have 3.9 acres of impervious surfaces (covering 28 percent of the project site). The Trust would limit impervious surfaces to the extent feasible. Proposed stormwater management strategies would mitigate any impacts from flows during storm events. The required SWPPP would control sediment in project site runoff during construction.

Stormwater management practices minimize runoff and increase infiltration which recharges groundwater and improves water quality.

Storm Drainage

All alternatives would comply with applicable federal, state and local stormwater codes, including the Energy Independence and Security Act of 2007, Section 438 (EISA 438) and water quantity requirements equivalent to LEED Sustainable Sites Credit 6.2. EISA 438 requires the parklands project to use site planning, design, construction and maintenance strategies to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology with regard to the temperature, rate, volume and duration of flow. LEED Sustainable Sites Credit 6.2 requires the parklands project to capture and treat the rainfall from a design storm of 0.75 inch using BMPs, and complete a SWPPP.

In compliance with PTMP ROD Mitigation Measure UT-7 *Stormwater Reduction*, the stormwater management system would rely on low-impact development techniques to the maximum extent feasible. BMPs would be integrated into the landscape and grading design plans to minimize runoff and to increase on-site rainwater retention. In general, stormwater would be directed into the landscaped areas where it would migrate vertically through four feet of well-drained soil media. Below the four-foot layer, heavily compacted soil would most likely limit infiltration opportunities. As such, a subsurface drainage collection system would be installed. This could come in the form of a layer of aggregate that houses perforated pipes with a geotextile fabric in between the soil and aggregate. Alternatively, the use of a flat, perforated pipe system that can reside directly in the soil or within a thinner layer of aggregate would be explored in order to minimize the depth needed for drainage solutions and maximize the planting soil depth.

In order to comply with EISA 438 in the upper area of the project site, stormwater runoff from a 1.32-inch rainfall event would be retained and managed onsite through a combination of infiltration, evaporation and onsite reuse. Due to the low-lying nature of the northern portion of the project site, strategies to comply with EISA 438 in this area would be evaluated during schematic design. The drainage system would be independent of the Presidio Parkway drainage system with minimal water, if any, making its way into the highway drainage system. Subsurface drainage improvements would also be located in the embankment, terracing down the slope, to the flat area below. The subsurface drainage system would be collected into hard-lined pipes and routed to the retention system. The retention system would require an overflow pipe connection to the Trust-owned drainage system. A surface drainage system consisting of area drains and catch basins would collect runoff from large storm events as well as overflow from smaller events. This system would tie into the Trust-owned drainage system. The parklands project would also upgrade a section of the trunk lines leading to Outfall F from 24- to 36-inches (Magnusson Klemencic Associates 2015).

Parking Lots

New parking lots could contribute a number of substances, such as trash, suspended solids, hydrocarbons, oil and grease, and heavy metals that could enter receiving waters through stormwater runoff or non-stormwater discharges. Runoff would be directed from parking lots to pervious areas for retention/detention and infiltration. The Trust would also follow protocols including using good housekeeping practices, following appropriate cleaning BMPs, and training employees to prevent or reduce the discharge of pollutants from parking areas.

Lawn and Landscaped Areas

Stormwater runoff from landscaped areas would be minimized by maximizing groundwater infiltration and stormwater drainage at the project site. A thorough site grading and drainage plan utilizing appropriate design measures would be implemented. Groundwater percolation would also be promoted through soil decompaction and permeable ground cover materials. Plants with low irrigation requirements (for example, native or drought tolerant species) and that minimize or eliminate the use of fertilizer or pesticides to sustain growth would be selected. Only plant materials adapted to the project site's microclimate would be installed. Wood chips would be used in planter areas without ground cover to minimize sediment in runoff.

Irrigation water provided to landscaped areas may result in excess irrigation water and pollutants, such as pesticides, herbicides and fertilizers, being conveyed into the storm drain system. Project plan designs would include application methods of irrigation water that minimize runoff of excess irrigation water into the stormwater conveyance system.

In addition, the Trust's Roads and Grounds Integrated Pest Management Program (IPM)[16] would be implemented at the project site to minimize pesticide drift, runoff and groundwater contamination. All herbicides and pesticides proposed for use would be rapidly biodegradable, approved in advance by the Trust IPM Coordinator, and applied according to manufacturer's label recommendations and in conformance to all applicable laws and regulations.

CONCLUSION

Water demand for the proposed project represents approximately 1.0 percent of the Presidio's total annual consumption. Landscapes would be planned, designed, installed, managed and maintained to promote the conservation and efficient use of water and to prevent the waste of this valuable resource. Water irrigation systems would allow for the future use of recycled water. Stormwater management practices would be integrated into the landscape and grading design plans to minimize runoff and to increase on-site rainwater retention. Multiple best management practices would be used to control erosion and prevent sediment from entering Crissy Field Marsh and the San Francisco Bay.

[16] IPM is an ecosystem-based strategy that focuses on long-term prevention of pests and their damage through a combination of techniques such as biological control, habitat manipulation, modification of cultural practices, and use of resistant plant varieties. Pesticides are used only after monitoring indicates they are needed, according to established guidelines, and treatments are made with the goal of removing only the target organism. Pest control materials are selected and applied in a manner that minimizes risks to human health, beneficial and non-target organisms, and the environment. The Trust's Roads and Grounds IPM Program (2002c) is on file and available for review at the Presidio Trust.

ENVIRONMENTAL SUSTAINABILITY & CLIMATE PREPAREDNESS

Sustainability is based on the principle that everything that we need for our survival and well-being depends, either directly or indirectly, on our natural environment. Sustainability creates and maintains the conditions under which humans and nature can exist in productive harmony, that permit fulfilling the social, economic and other requirements of present and future generations. Sustainability is important to making sure that we have and will continue to have, the water, materials, and resources to protect human health and our environment. – EPA Sustainability Website

It is now well established that rising global atmospheric greenhouse gas (GHG) emission concentrations are significantly affecting the Earth's climate. However, according to the Council on Environmental Quality, climate change is a particularly complex challenge given its global nature and inherent interrelationships among its sources, causation, mechanisms of action and impacts. Broadly stated, the effects of climate change observed to date and projected to occur in the future include more frequent and intense heat waves, more severe wildfires, degraded air quality, more heavy downpours and flooding, increased drought, more intense storms, harm to water resources, harm to wildlife and ecosystems, and greater sea-level rise, State agencies such as the Bay Conservation and Development Commission (BCDC) expect no less than 31 inches and perhaps as much as 69 inches of sea-level rise on the West Coast by 2100 (BCDC 1968 as amended October 2011). The lower site areas along Mason Street are at risk of increased frequency and severity of inundation due to tides, tsunami and sea-level rise. Areas below elevation 14.0 (which includes Mason Street and all of the existing flat areas between Mason Street and the new embankment) could either be flooded (if not elevated) or have access curtailed by flooding along Mason Street (Moffatt & Nichol 2013).

The Doyle Drive EIS/R noted Caltrans' approach to dealing with GHG emissions and climate change through its Climate Action Program at the State level but did not evaluate the impacts associated with an increase in GHG emissions levels for the Presidio Parkway project (Section 4.4.1 Climate Change, page 4-14.).

Climate change is a fundamental environmental issue, and the relation of Trust projects to it falls squarely within NEPA's focus. Environmental outcomes are improved by identifying important interactions between a changing climate and the environmental impacts from a project, and can contribute to safeguarding the Presidio's infrastructure against the effects of extreme weather events and other climate related impacts. Hence, analyzing a project's climate impacts and the effects of climate change relevant to the project's environmental outcomes can provide useful information to the Trust Board and the public.

The Trust is taking an active role in addressing GHG emission reduction and climate change. In its Strategy 2020 (Trust 2015c), the Trust defined its focus for the next five years, including operating the Presidio's infrastructure using sustainable practices (Steward the Presidio, page 11). It intends to accomplish this through the following means among others:

- Meeting or exceeding California and/or federal standards for efficiency related to energy, waste, and waste generation[17]
- Monitoring and reducing the Presidio's carbon footprint
- Promoting water self-sufficiency with conservation, reclamation, planting choices, and other techniques

[17] On March 19, 2015, President Obama signed Executive Order 13693 (http://www.gpo.gov/fdsys/pkg/FR-2015-03-25/pdf/2015-07016.pdf). Mr. Obama's directive orders federal agencies over the next decade to cut their emissions by an average of 40 percent compared with their levels in 2008, and to increase their use of electricity from renewable sources by 30 percent.

The Trust's draft Climate Action Agenda (2015d) reviews how climate change is affecting parks, and proposes a baseline for the Presidio's carbon footprint. It then suggests a number of initiatives, from resource and energy conservation to education and programming, which can be implemented for the Presidio to become a model of sound environmental stewardship. The report is a first step in the development of a Climate Action Team and the articulation of quantitative, tangible goals that will prepare the park for climate change. Also outlined are strategic goals to mitigate the effects of climate change, increase climate change education, and implement sustainability best practices. These goals include protecting the historical and ecological structure of the park through increased resilience planning, participating in the reduction of atmospheric carbon, and strengthening landscape productivity.

Improved environmental performance will help us protect our planet for future generations and save taxpayer dollars through avoided energy costs and increased efficiency, while also making Federal facilities more resilient. – Executive Order 13693 of March 19, 2015, Planning for Federal Sustainability in the Next Decade

Would the proposed project or any of the alternatives be inconsistent with Trust sustainability and climate preparedness priorities or contribute to climate change through GHG emissions?

ALL ALTERNATIVES

All alternatives being considered would achieve the goals of the Climate Action Agenda by adopting the following strategies as part of the parklands project:

Climate resilient design means to design buildings to prepare for, withstand, respond to or quickly recover from disruptions due to severe weather events and climate change for the intended life of the building.

- Optimize the assets of the site, such as access, views, orientation, sunlight, connectivity, programming and adjacency.
- Introduce natural areas within the designed landscape to promote biodiversity and habitat for birds, butterflies and other species.
- Follow LEED building standards for new construction and building rehabilitation within the site, and analyze the energy efficiency of new buildings to assess if they meet their goals.
- Incorporate climate-resilient design into rehabilitation of existing buildings and the design of new buildings within the site.
- Ensure the design of new buildings at Crissy Field meet International Building Code performance objectives for construction and modifications of buildings within flood hazard areas (see FEMA 2007).[18]
- Use energy efficient light fixtures in buildings and outdoors.

[18] The IBC also references ASCE 24 which provides code-directed performance measures and standards for structural design and construction.

- Develop renewable on-site generation where appropriate.
- Install irrigation systems to anticipate recycled water availability.
- Limit irrigated turf to programmatic spaces, scaled to particular types of experience and activity.
- Landscape other areas not expected to be actively used except as a visual resource with local native plants and climate-adapted non-natives species that can tolerate the anticipated range of temperatures, rainfall patterns, and potential inundation from sea level rise.
- Avoid invasive plants and utilize integrated pest management with least toxic methods as the first course of action.
- Consider how the Learning Landscape could serve as a flooding buffer for the Crissy Field Center.
- Create absorbent landscapes and utilize onsite stormwater management.
- Showcase 21st century sustainable maintenance practices following Bay-Friendly Landscape Coalition (Bay-Friendly Landscaping & Gardening Coalition 2013) or similar Presidio-specific guidelines.
- Meet the State's Model Water Efficient Landscape Ordinance (California Department of Water Resources 2015) water efficiency standards for new and retrofitted landscapes through more efficient irrigation systems, greywater usage, onsite storm water capture, and by limiting the portion of landscapes that can be covered in turf.
- Source materials locally to the extent possible and use natural or synthetic materials that are salvaged, renewable and/or recyclable.
- Provide indoor and outdoor waste management receptacles, including separate containers for recyclable and compostable materials at all bin stations.
- Use materials that minimize heat gain in the summer (without reflective glare) and heat loss in the winter.
- Use energy efficient and low emissions construction equipment that meet and exceed EPA Tier 4 emission standards.
- Use proactive park design as an opportunity for public education on climate change; explain anticipated changes and how the park is planned for long term viability. Make climate change real, immediate, and relevant for people by raising awareness, illustrating the importance of reducing GHGs, and demonstrating a sound environmental stewardship ethic for this issue.

CONCLUSION

Adoption of site-specific strategies to further the goals of the Trust's Climate Action Agenda would anticipate changes at the project site and surrounding areas that may result from climate change, improve environmental conditions and provide benefits. Incorporating sustainability considerations into resilience planning would also help prepare for and adapt to the effects of climate change.

HAZARDOUS SUBSTANCES

The assessment and cleanup activities related to hazardous substances, pollutants, and contaminants remaining on the Presidio from the U.S. Army's tenure are being conducted by the Trust with oversight by the California Department of Toxic Substances Control (DTSC) and the San Francisco Bay Regional Water Quality Control Board (Water Board). This program involves extensive investigation, analysis, reporting and remedial design and remedial action strategies.

The new parklands are located within the Presidio, which was a military installation until 1994. Due to its military past and the age of the facilities, a number of hazardous materials sites were investigated within the park. Within the project site, north of the proposed embankment, a cleanup site known as the Commissary/PX Study Area historically contained a number of structures that constituted the Presidio Consolidated Motor Pool. Throughout 2000, the Trust conducted a series of investigations to identify and delineate the source of petroleum in the groundwater seeps at Crissy Field. Interim source removal activities, including the excavation of petroleum-affected soils, were conducted to address the groundwater seep contamination. During 2002 and 2003, two additional investigations were conducted to delineate petroleum contamination in this area. Four sub-areas within the Commissary/PX Study Area associated with potential hazardous materials releases were included in a Final Remedial Action Plan (Final RAP) (MACTEC 2007). Cleanup of the Commissary/PX Study Area was conducted under the oversight of both the Water Board and DTSC. The Trust's Revised Final Corrective Action Plan (CAP) was approved by the Water Board in 2006 and the Final RAP was approved by the DTSC in 2008. The cleanup work was completed in multiple phases and corrective actions consisted of the following: excavation and removal of impacted soils, cover in place of impacted soils, and land use controls. A Land Use Control (LUC) zone was established to prohibit unrestricted use of the Commissary/PX LUC Area and maintain a cover over areas with residual contamination in soil following remedial actions completed at the site in 2008 (AMEC Geomatrix 2008, 2009).[19] Restrictions within the LUC zone include:

- Use for construction of new facilities for housing or the operation of schools, hospitals, playgrounds, and day care centers is prohibited without further remediation.
- Workers potentially exposed to soils will follow the site-specific Health and Safety Plan, have the appropriate level of health and safety training, and use the appropriate level of personal protective equipment specified in a Health and Safety Plan.

[19] The LUC is an element of the 2012 Operations and Maintenance (O&M) Agreement and associated O&M Plan between the Trust, National Park Service and the DTSC, and outlines restrictions on future land uses and requirements for soil disturbing activities. A copy of the current LUC is available for review at the Presidio Trust.

- All soils excavated will be managed and/or disposed in accordance with Presidio policies and procedures and applicable federal, state, and local laws and regulations.
- Use as a saltwater ecological habitat area or ecological special status habitat area is prohibited.
- Soil will remain covered with concrete, buildings, landscaping, or another appropriate barrier (e.g., a minimum of 24 inches of fill, or 6 inches of fill and an engineered barrier layer) in landscaped areas.

The Doyle Drive EIS/R envisioned the excavation, testing and off-site disposal of soil removed from the Main Post tunnel as it coincides with the Commissary/PX LUC area. Since then, DTSC has approved the proposed soil import to the LUC that will be used as backfill around the Main Post tunnel.

Would the proposed project or any of the alternatives involve handling of hazardous substances?

ALL ALTERNATIVES

Existing barriers to soils within the LUC zone such as pavement, buildings, and landscaping would be maintained to the extent possible to prevent direct physical access with underlying soils that contain residual contaminants of concern. Site-specific land use restrictions within the Commissary/PX LUC zone would be conformed with or further remediation would be undertaken in consultation with the Water Board and DTSC to allow currently restricted land uses, for example, playgrounds and expansion of saltwater ecological habitat areas or special status habitat areas within the Learning Landscape area. If, as a result of the parklands project, soil is excavated within the LUC zone, sufficient soil would be removed such that a LUC is no longer required (clean closed), or soil would be consolidated and capped such that it does not pose a risk to human health or the environment based on the planned land use. Documenting site conditions and estimating human health and environmental risk could require additional site characterization activities such as soil sampling and the preparation of risk assessments. Required additional remedial measures would be identified based on the estimated risks, and the measures preferred by the parklands project would be approved by the appropriate regulatory agency. Additionally, any soil imported to the LUC area would need to be approved as chemically acceptable. In all cases, where the LUC remains, the Trust would continue its obligations to monitor soil disturbing activities and prepare annual reports documenting those activities to the DTSC.

CONCLUSION

Implementation of new site uses and soil disturbing construction in the Commissary/PX Land Use Control area as part of the parklands project would be subject to regulatory approval of planned land use changes and remedial actions (as required) in advance of construction. Should the land use include ecologic habitat and facilities considered sensitive uses, additional remediation to remove and/or cap

contaminated soil would ensure protection of human health and the environment. For areas where the LUC would remain in effect, the Trust would continue annual monitoring and reporting to the DTSC.

CUMULATIVE IMPACTS

The Trust found the following projects relevant to the cumulative impact analysis because they have a bearing on the effects of the proposed project and alternatives:

- Current use of Building 50 (Presidio Officers' Club) as a recently transformed cultural center (Trust): The Officers' Club features exhibits about the Presidio's history, a destination restaurant, free public programs including live music and dance, talks, films, and family activities, and event and education spaces.
- Future use of Buildings 1182-1188 (Mason Street warehouses) as a sporting goods store and recreational program center (Sports Basement) (Trust): The store will promote healthy lifestyles and enjoyment of the park by selling athletic gear and apparel, offering free fitness classes, facilitating group workouts, and hosting educational and cultural events.
- Future use of Building 210 as the Visitor Center to serve as an interpretive/orientation portal between the historic Presidio and New Presidio Parklands/Crissy Field (Trust/NPS): Visitors with a short amount of time will be able to quickly find the tools and resources necessary to identify and go to specific destinations. Others will encounter interpretive storytelling devices (including interpretive retail products) to help inspire and guide their travels.
- Future use of Building 610 (former Commissary) building as a museum or cultural center as foreseen in the PTMP (Trust): Multiple activities have been contemplated for the site. Responses have included exhibition spaces for permanent and changing exhibitions; indoor and outdoor activities; educational programs and activities; access to Crissy Field, the bay shoreline and Presidio trails; food service; theater and performance space; large, visible green areas; and sculpture and art.
- Future restoration of Quartermaster Reach (Trust): An approximately 850-foot length of stream, currently running through a subsurface culvert that ultimately discharges to Crissy Field Marsh at the northern-most (lowest) end of the Tennessee Hollow watershed near the Presidio Parkway, will be "daylighted" in order to restore (create) wetland habitat.
- Potential repairs and improvements to Crissy Field ("Crissy Refresh") (NPS): While still speculative and under development, this could include repair and rehabilitation, additional capital upgrades, and potential changes to facilitate program enhancements.

"Cumulative impact" is defined in the CEQ NEPA Regulations as the "impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions..." (40 CFR 1508.7) The following cumulative effects analysis is guided by the scoping process in which the scope and "significant" issues to be addressed in the EA were identified, including the following: transportation, parking, visitation, historic resources, archaeological resources, visual resources, light and glare, and hazardous substances.

- Potential long-term use of Building 1199 (temporary Crissy Field Center) for as-yet-undefined park-related and public uses (NPS): Suggested uses include reuse or repurpose for East Beach; lease for income; kayak, bike and other recreational equipment rentals; food service or event rental; and outpost for Crissy Field Center (Building 603).
- Future long-term use of the Palace of Fine Arts building (City of San Francisco): Proposals recently submitted include: an arts space, destination market hall and a holistic wellness pavilion (Arcadium SF); an athletic club and public recreational facility (Bay Club); multi-use playing fields, along with a small cafe and community events space (Bladium Sports and Fitness Club); exhibition pavilions, an international cuisines pavilion and an arts technology (Center for Global Arts and Cultures); a conference center and events facility (Maybeck Center); a San Francisco arts, crafts, community and hospitality center (Equity Community Builders), and an interactive and educational museum, destination restaurant, retail and café kiosks, and theater (San Francisco Museum at the Palace Consortium).[20]

TRANSPORTATION

The transportation analysis considers the identified cumulative projects, as well as occupancy of remaining vacant buildings in the Main Post and Crissy Field districts. Under cumulative conditions, Alternatives 2 and 3 would increase the total number of peak hour vehicle trips in the combined Crissy Field (Area B) and Main Post districts by approximately 2 percent on both weekdays and 5 weekends. Any improvements to Crissy Field associated with Crissy Refresh would be coordinated with the parklands project to ensure safe and logical trail connections. Identified intersection improvements and implementation of the Trust's Transportation Demand Management (TDM) Program, including parking fees and PresidiGo shuttle service to encourage the use of alternative modes such as transit, walking, cycling and carpooling, would minimize the impacts of traffic generated by uses throughout the Presidio below significant levels.

PARKING

The parking analysis considers the cumulative projects and increased demand from the Presidio Officers' Club, Mason Street Warehouses, Building 610, and future occupancy of other buildings in the Main Post and Crissy Field districts. The parking analysis also considers the reduction in parking supply associated with the Presidio Parkway project. There would generally be sufficient parking in the Main Post district and the Crissy Field district to accommodate demand from the cumulative projects, but due to seasonal variation in park visitation, parking demand is expected to exceed supply in some areas on peak weekend days. Visitors who choose to drive to the park on those days would have difficulty parking. The

[20] For more information, see http://sfrecpark.org/about/partnership-opportunities/palace-of-fine-arts-request-for-concept-proposals/palace-of-fine-arts-proposals/.

provision of park-wide TDM measures (e.g., parking time restrictions and/or fees) identified in the PTMP that encourage the use of alternative modes would serve to reduce the expected parking shortfall. Implementation of park-wide parking management (as recommended in PTMP EIS Mitigation Measure TR-21 *Presidio-Wide Parking Management*) would reduce the impacts of fee parking throughout the park.

VISITATION

Rehabilitation, expansion and upgrades to facilities resulting from the cumulative projects would expand visitor opportunities and access to park resources, and engage a wider audience in the following ways:

- The New Presidio Parklands would welcome visitors with spectacular views, food and amenities, free public events, pathways and vistas points, and spaces where people could gather.
- The updated Presidio Officers' Club attracts visitors reflecting the diversity of the Bay Area with exhibits and programs that help establish a deep understanding of the Presidio's role in shaping California and the nation.
- The Visitor Center would include interpretive elements to augment (and differentiate from) the Officers' Club. Visitors' experiences would be enhanced by providing them with needed information, orientation and services.
- Sports Basement will reuse the Mason Street warehouses for activities compatible with Crissy Field's open space and recreational opportunities, and allow the community and visitors to enjoy the park and appreciate its resources.
- However the program is developed and whatever its ultimate focus, a cultural institution at the Commissary site would be a resource for the community and a national and international draw. Programmatic offerings would be provided that are fresh and vital, that connect to broader themes, and that stimulate imagination and creativity. Cross-disciplinary programming would advance knowledge that has broad and lasting relevance. Changing exhibitions would engage repeat visitors.
- Quartermaster Reach will increase recreational and educational use of the restored 9.5-acre natural habitat area. Completion of the pedestrian trail from Lincoln Avenue to Mason Street would provide another direct connection from the park's uplands to Crissy Field and the bayfront.
- Crissy Refresh could provide additional programing to mid-Crissy to allow for a greater dispersion of visitors throughout Crissy Field, helping to alleviate congestion in East and West Crissy. Potential circulation changes could reduce visitor conflicts arising from the heavy use of bicyclists and pedestrians.

- Reuse of the Crissy Field Center at East Beach site would allow the NPS and/or Conservancy to maintain access to the natural and cultural resources of the park, especially the outdoor areas of Crissy Field, in community-based environmental programs that serve youths, schools and community organizations, while being minimally intrusive on existing activities at Crissy Field.

- Leasing of the Palace of Fine Arts Building would give Presidio visitors the option to connect with the Palace. Meaningful public access to the Palace while offering a desired use would enhance the visitor experience in the larger community.

Together, cumulative projects would contribute to the Presidio's ongoing transformation into a welcoming destination that provides meaningful experiences for visitors from around the world. When there is good weather and special events are taking place resulting in more crowded conditions, demand might exceed visitor amenities offered, even with application of visitation measures. Visitor satisfaction and experience would likely decrease, and some visitors who would normally visit the Main Post or Crissy Field may not want to visit the areas. The amount of visitation displacement that would occur is not specifically known, and is likely to vary based on visitors' expectations of crowding levels from weekdays to peak weekends. Visitors would likely be displaced to other recreational areas within the park or other nearby city or GGNRA sites where similar visitor experiences are available. However, on most weekdays and weekends, conditions are expected to be busy with only minor crowding. Adjacent areas may witness slightly more crowded conditions than typically experienced currently during special events. Related issues, such as parking and access problems would arise, but the new parklands project's incremental contribution to cumulative conditions would be small.

CULTURAL RESOURCES

The cumulative projects would have no direct and indirect effects within the project area, especially when added to the aggregate effects of past individual projects and the overall level of change within the NHLD. The rehabilitation of Crissy Field (completed in 2001) removed 32 historic buildings to restore earlier historic and natural features and to introduce parking for recreational activities. The construction of the Letterman Digital Arts Center (completed in 2005) replaced non-historic buildings and a large parking lot with compatibly designed new buildings and landscape. The replacement of Doyle Drive (which began construction in 2009) is in the final stages of replacing the historic elevated roadway with a new parkway, which included the removal of historic buildings and streets, and the reconfiguration of the historic Main Post bluff to accommodate the parkway.[21] All three of these projects have had or will have impacts on the NHLD due to removal of contributing resources and the introduction of new buildings.

[21] The proposed project or its alternatives would in part minimize and mitigate the adverse effects of the Presidio Parkway project on the NHLD by designing a new park to evoke the form of the historic bluff between the Main Parade and Crissy Field, and maximizing physical and visual connectivity.

The magnitude of impacts of the cumulative projects are limited and would have no relationship to the impacts of these past projects, as the projects would:

- replace non-historic buildings with new buildings of a similar or smaller scale (future use of Building 610 as a museum or cultural center, long term use of Building 1199)[22],
- rehabilitate buildings for compatible new uses requiring minimal alteration of the character-defining materials, features, spaces, and spatial relationships of the buildings and their settings (Building 50/ Officers' Club cultural center, Mason Street Warehouses sporting goods store, Building 210 Visitor Center, long-term use of the Palace of Fine Arts), and
- execute landscape improvements that are consistent with pre-existing guidance developed explicitly to avoid adverse effects to historic resources (restoration of Quartermaster Reach, Crissy Refresh).

The proposed project's finding of effect in Attachment 2 confirms that the proposed project or its alternatives would minimize and/or partially mitigate the present effects of a much larger project (replacement of Doyle Drive), adhere to applicable planning and design guidelines, and maintain the integrity of the NHLD. The cumulative projects would have primarily beneficial effects similar in scope to the parklands project that would not reach a point of significance.

ARCHAEOLOGICAL RESOURCES

Ground-disturbing activities associated with cumulative projects, including future use of the Commissary, could adversely affect archaeological sites. The cumulative projects could also adversely affect unknown sites that may be identified through future research or an unanticipated discovery. Archaeological review would be required before undertaking or permitting ground-disturbing activities. Any ground-disturbing activities that may affect known or predicted archaeological sites would be evaluated and subject to a range of requirements including, but not limited to, avoidance of the sites, monitoring, coring or trenching, and testing and/or data recovery. All artifacts found would be cataloged, appropriately treated, and properly stored or displayed according to applicable federal standards and the Trust's Archaeological Collections Management Policy. These requirements would help avoid or mitigate potential adverse effects.

[22] Implementation of relevant design guidelines would further ensure that new construction is compatible with the historic district, minimizing impacts on the historic scene.

VISUAL RESOURCES

Potential future restoration, and facility rehabilitation, expansions, and improvements associated with the cumulative projects would enhance visual resources and opportunities to enjoy views within and around the project area. Restoration of the Quartermaster Reach would transform the presently denuded lands east of and adjacent to the project site into one of a more naturalistic character that would further complement the aesthetic of the restored Crissy Field Marsh and appear as an extension of the revegetated project site. Restoration projects envisioned as part of Crissy Refresh would similarly increase this naturalistic aesthetic. In addition, Crissy Refresh facility upgrades and program enhancements would indirectly increase bay viewing opportunities by making Crissy Field more accessible and enjoyable to park visitors. Each of these cumulative projects is part of a larger transformation of the San Francisco waterfront into a more visually interesting, accessible and engaging environment. The incremental effects on visual resources resulting from cumulative projects would advance the Trust's and NPS' interests and objectives of preserving and enhancing the visual resources and viewing opportunities throughout the Presidio and along the bay shoreline.

LIGHT AND GLARE

The cumulative projects would reduce the amount of light to be more suitable for the intentional natural darkness of the Presidio. Lighting for all projects would be designed to strike a balance between the darkness of nature and the minimum lighting necessary for the human activities occurring at night. The large and mostly inefficient light sources at the Commissary site would be replaced by new lighting methods that provide a better park experience with no environmental damage to the adjacent Crissy Field Marsh. Both the replacement lighting at the Commissary site and the new lighting at the Mason Street warehouses would adhere to the Trust's guiding principles for lighting. The Crissy Field Center at East Beach would be guided by NPS Management Policies to ensure the light emanating from the facility is minimized (NPS 2006).

BIOLOGICAL RESOURCES

In general, the effects of cumulative projects on biological resources in the project area would be beneficial. Restoration of the Quartermaster Reach would provide more open water habitat for aquatic species, greater foraging opportunities for wildlife, an expanded corridor for wildlife movement, and improved water quality, among other benefits. Similarly, habitat restoration and enhancement projects undertaken as part of Crissy Refresh would contribute to the overall transformation of Crissy Field to a more naturalistic environment and provide increased wildlife habitat value and opportunity for native plant community expansion. These projects, in addition the parklands project, would enhance and expand the vegetative landscape of the Presidio and increase the extent of available habitat within the

Presidio for occupation by local wildlife and reintroduction and establishment of special-status or rare plant populations. The projects would allow for the reconnection of open space between the Crissy Field and the Main Post that would facilitate animal movement between various habitats types within the Presidio.

HAZARDOUS SUBSTANCES

Cumulative projects, in combination with additional activities that further reduce the potential occurrence of hazardous substances, pollutants, and contaminants within and adjacent to the project area, would contribute to the cleanup of waste sites from when the Presidio was a U.S. Army post and support overall the environmental remediation program at the Presidio. The Trust's comprehensive environmental cleanup to date has included:

- closure of approximately 576 underground and aboveground fuel tanks;
- removing approximately 11 miles of former fuel distribution piping;
- removing lead-based paint contaminated soil from the drip-lines of approximately 700 buildings and structures;
- removing over 350,000 tons of soil and debris from multiple landfill sites where the Army disposed of municipal waste and construction debris, in order to restore native habitat and construct recreational improvements; and
- capping waste fill sites that cannot effectively be removed in a manner protective of human health and the environment, and that allows future development.

Thus, the cumulative impact of cleanup activities at and near the project area would be considered beneficial insofar as it would help accomplish the Trust's goal of reducing risk of exposure to hazardous substances to levels that are protective of human health and the environment.

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ATTACHMENT 1

FINDING OF NO SIGNIFICANT IMPACT

1 FINDING OF NO SIGNIFICANT IMPACT

PROJECT PURPOSE & OVERALL VISION

The Presidio Trust, in consultation with the Golden Gate National Parks Conservancy and the National Park Service, Golden Gate National Recreation Area (NPS), is developing 14 acres of new parkland atop a dramatic bluff and at the base of the bluff extending from Lincoln Street to Mason Street in the Presidio of San Francisco (Presidio). The project, referred to as the Presidio Tunnel Tops (formerly New Presidio Parklands) has come about as the result of replacing Doyle Drive, the 75-year-old freeway leading to the Golden Gate Bridge, with the Presidio Parkway. The Presidio Parkway includes an at-grade, tunnel-covered roadway that reconnects the two most public spaces in the Presidio: the Main Post, the historic center of the Presidio, and the bay waterfront at Crissy Field. The Presidio Tunnel Tops will feature scenic overlooks, paths and gardens, a community plaza with food and services, a campfire circle and picnic grounds, and an interactive "learning landscape" where kids can explore nature. The project has the potential to become one of the most distinctive park sites in the country, welcoming a broad cross-section of local, national and international visitors to the Presidio. The project site is expected to offer a high quality park experience and provide visitor-serving amenities and activities necessary to welcome the public, enrich their visit, and encourage them to return. The project was foreseen in the Presidio Trust Management Plan (PTMP), the Trust's land management plan for Area B.

The project will:

- welcome all visitors and offer a profound experience of the Golden Gate
- serve as a platform for programs that celebrate and provide insight into all that can be seen from this new vantage point
- provide information and services to make visitors comfortable
- embrace our community, especially those who have not had opportunities to visit our national parks, as well as general park visitors
- function as the gateway to the entire Presidio

This finding of no significant impact (FONSI) provides the basis for the Trust's determination that creating 14 acres of new parkland connecting the San Francisco Bay waterfront with the historic center of the Presidio (project), as analyzed in the attached Presidio Tunnel Tops Environmental Assessment (EA), will not have a significant effect on the human environment and does not require the preparation of an environmental impact statement (EIS). A description of the project and its environmental consequences are contained in the EA, which is incorporated by reference into this FONSI.

PREFERRED ALTERNATIVE

Alternative 3, as developed by James Corner Field Operations (JCFO) and modified by the project team with public input following the analysis in the October 2015 EA, is the Trust's "preferred alternative" (Figure 1-1 and Table 1-1). The preferred alternative has been modified slightly and differs from the proposed project analyzed in the October 2015 EA in that the Transit Center (Building 215) will be remodeled and no new building will be built on Graham Street.

- The preferred alternative will support a range of group sizes as well as programs and experiences, from individual pursuits and small gatherings to programs, in diverse landscapes and settings.
- Key elements include lawns, gardens and meadows; pathways for strolling; nooks for seating and small gatherings; picnic tables and barbeques; three overlooks; 41,101 square feet of building space and 54 parking spaces.
- The Anza Esplanade will be extended to connect the Main Post to a Central Overlook, which is a central viewing and gathering point.
- The Observation Post (Building 211) will be demolished and the Transit Center will be remodeled to include more restrooms, a reconfigured food service venue and covered outdoor seating.
- A new plaza will function as the main social and multi-functional arrival and gathering area between the Transit Center and the Presidio Visitor Center.
- A Cliff Walk will follow the edge of the embankment and connect visitors to the wider landscape. Along this walk, there will be three overlooks, designed with simple walls that will resemble both the historic batteries along the coast and recently constructed overlooks in the Presidio.
- A series of grassy terraces stepping down from the Central Overlook will offer extraordinary bridge views, provide space for gathering, orientation, interpretation and programming, and connect the Central Overlook to the landscape below.
- A fully accessible Bluff Walk will traverse the embankment and connect the bluff to Mason Street and the Learning Landscape, the outdoor component of the Youth Campus. Stairs near the West Overlook will also connect down to the Learning Landscape and Youth Campus.
- The Youth Campus will be east of the Learning Landscape and will include a renovated Crissy Field Center, new Field Station and Classroom buildings to house additional program space. The new buildings will be 3,380 square feet and 3,148 square feet, respectively.

FIGURE 1-1 PREFERRED ALTERNATIVE — PRESIDIO TUNNEL TOPS

ITEM	QTY UNIT	LEGEND KEY	PREFERRED ALTERNATIVE
			PRESIDIO TUNNEL TOPS
Total Built Space			32,807
Existing Buildings [1]	Gross Square Feet		*35,573*
Demolition		*N/A*	*-9,294*
New Building(s) - Youth Campus [2]			*6,528*
Total Gathering Areas			5.5
Hardscape [3]	Acres		*4.2*
Lawns			*1.3*
Gardens	Acres		2.6
Predominently Native Plantings [4]	Acres		4.4
Learning Landscape [5]	Acres		0.6
Paths [6]	Linear Feet		11,394
Overlooks	Number		4
Parking Spaces	Number	P	53

1-4

[1] Includes Buildings 201, 210, 211, 215 and 603.

[2] Includes the new Field Station and Classroom buildings adjacent to Building 603 (no single building would exceed 5,800 GSF).

[3] Includes all paved area (plazas, terraces, overlooks, and paths), permeable paved areas (decomposed granite), and excludes Learning Landscape.

[4] Includes bluff slope and native plantings in the Learning Landscape.

[5] Includes all hardscape and paths within Learning Landscape, excludes native plantings

[6] Includes new sidewalks along Mason, Lincoln, French Court and Graham.

TABLE 1-1 PREFERRED ALTERNATIVE — PRESIDIO TUNNEL TOPS

GOALS

The project fulfills the Trust's, NPS's and Conservancy's vision for this site of the Presidio by achieving all of the following goals intended by the project purpose:

- Honor the significance of the Presidio
- Offer a magnificent experience of the Golden Gate
- Welcome all
- Integrate the natural landscape of Crissy Field and the cultural landscape of the Main Post
- Create the best place to begin a Presidio experience
- Provide exceptional environmental learning opportunities

OTHER ALTERNATIVES

In addition to Alternative 3, the following alternatives were considered in the EA analysis or eliminated from detailed study:

ALTERNATIVE 1 – PRESIDIO TRUST MANAGEMENT PLAN UPDATE

The PTMP Update Alternative is the baseline or "no-action alternative" that was evaluated in the Doyle Drive EIS/R and anticipated in the 2002 PTMP and 2010 Main Post Update to the PTMP. The alternative would be an open, largely undifferentiated landscape that is planted primarily with native vegetation. The site would accommodate individuals and small groups. Paths would provide pedestrian north/south and east/west access. The Crissy Field Center (Building 603) would remain unchanged and the surrounding landscape would be largely native plants. The Observation Post (Building 211) would be reused for office space. Building 201 would be moved to its permanent location on the west side of Halleck Street and rehabilitated by the Presidio Parkway project. Building 215 would remain as the Transit Center. Key elements of the PTMP Update Alternative include paths, an expanse of native plantings, 35,573 square feet of building space, and 124 parking spaces.

ALTERNATIVE 2 – PRESIDIO PARKWAY

The Presidio Parkway Alternative builds on the analysis contained in the Doyle Drive EIS/R and responds to the Doyle Drive Built Environment Treatment Plan and the Doyle Drive Architectural Criteria Report. The alternative would be an open and diverse landscape with differentiated areas that accommodate individuals, families, and groups of different sizes. The focal point of the alternative would be a large,

civic promontory that accommodates larger groups for events and programs as well as informal gatherings. A range of opportunities would be provided for interpretation and learning. A variety of paths would offer east/west and north/south access as well as different ways to traverse and scale the bluff. The Observation Post (Building 211) would be retained for special events and public uses. Building 201 would be moved to its permanent location on the west side of Halleck Street and rehabilitated by the Presidio Parkway project. Building 215 would remain the Transit Center. The Crissy Field Center (Building 603) would be retained for youth programming and the adjacent landscape would be largely native plants and lawn used for recreation and other purposes. Key elements of the Presidio Parkway Alternative include gardens, lawns, and native plantings; visitor-serving plaza, central promontory with group fire pit, and areas to gather and sit; areas for programming; 35,573 square feet of building spaces; and 87 parking spaces.

EXPAND CRISSY FIELD MARSH ALTERNATIVE

This alternative was eliminated from further study because marsh expansion in the project site would severely limit the area available for educational uses associated with the Crissy Field Center and Learning Landscape. Expanding these facilities would allow the number of youth educated on the site to be increased from the previous 23,000 per year to 50,000 to 60,000 per year, which supports the project goal to provide exceptional environmental learning opportunities. Reaching this goal requires new educational facilities and outdoor learning environments that fill the entire area at the base of the bluff.

Furthermore, this alternative would neither substantially improve the health nor ensure the long-term ecological viability of the marsh (refer to the 2010 Crissy Field Marsh Expansion Study prepared by Philip Williams & Associates, Ltd.). Marsh expansion in this area could also have adverse effects on other resources. Major grading would be required in an area of predicted prehistoric archaeological sensitivity for buried deposits representative of seasonal collecting activities along the margins of the San Francisco Bay and its estuary. Excavation in the area would increase the possibility of encountering native soils with the potential for disturbing archaeological resources, affecting their physical integrity. In addition, excavation could pose a risk to human health or the environment as the area is within the Commissary/PX land use control (LUC) zone, which prohibits use as a "saltwater ecological habitat area or ecological special status habitat area." Additional remediation measures would be required to mitigate the potential for exposure to contaminants.

REMOVE COMMISSARY (BUILDING 610) ALTERNATIVE

This alternative was eliminated from further consideration because it is beyond the scope of the project. The Trust intends to complete a design for the project site before initiating planning for the future of the former Commissary site so that it can be informed and shaped by the vision for the project. This sequence was strongly encouraged by members of the public as well as agency partners at the conclusion of the request for proposals for a cultural facility at the former Commissary site. Proceeding with the project would not limit this alternative in the future.

DISPOSITION OF SIGNIFICANT ENVIRONMENTAL EFFECTS

Based upon the EA, the Trust determines that the project will not have direct, indirect or cumulative significant impacts on the human environment, with the exception of cumulative transportation impacts, which will be mitigated below significant levels. The analysis supporting this conclusion is presented in Section 4 (Environmental Consequences) of the EA. The following summarizes factors considered in this determination.

LAND USE CONSISTENCY

The project is not inconsistent with any land use plan, policies and related regulatory requirements for the area concerned. The State's (i.e., Bay Conservation and Development Commission's (BCDC's) public access) interests have been accommodated through the project's consistency with the Trust's own land use controls and the project is fully consistent with BCDC's enforceable policies. Building removal and construction will be within the parameters for both building demolition and new construction set in the Trust's formally adopted statements of land use policy (the Presidio Trust Management Plan and the Main Post Update to the PTMP).

TRANSPORTATION

The project will contribute to anticipated unacceptable operating conditions at study intersections, particularly on weekends. Signalization will mitigate the operation of the study intersections to Level of Service D or better with or without the additional traffic generated. However, signalization will be considered only as a last resort to avoid the potential impact on historic resources. Recently expanded MUNI bus service, improved pedestrian and bicycle connections included in the project, and Transportation Demand Management (TDM) measures such as more frequent and/or extensive PresidiGo service will encourage and accommodate the use of non-automobile modes, and reduce traffic congestion at all study intersections below significant levels. Management of programs and events will minimize traffic congestion on peak days.

PARKING

The project will not significantly impact the availability of parking in the Crissy Field or Main Post districts. On most days, parking management and other TDM measures will accommodate parking demand while also encouraging use of non-automobile modes. Management of programs and events will minimize impacts on peak days.

VISITATION

The project will allow visitors to begin using a new area within the park. The project will improve connectivity to and between adjacent areas in the park, facilitate the visitor experience, and increase

opportunities for visitor understanding of the Presidio. The project site design will ensure that visitor use impacts are minimized, and management actions will be available to ensure that park resources are protected.

HISTORIC RESOURCES

The project will not have a direct or indirect adverse effect on the National Historic Landmark District. The project will result in a visible change to the landscape when viewed from contributing resources in the project area, due primarily to new construction, building rehabilitation and expansion and key project landscape elements. However, conformance with applicable guidelines and planning documents will ensure that the design and construction of the buildings are consistent with the Secretary's Standards, resulting in a new structure or structures that are compatible with the character defining features of the NHLD and its contributing resources, including the setting and feeling of the NHLD in the project area. The key landscape features will be compatible with the established design criteria and will therefore enhance the qualities and characteristics of the project area and the NHLD as a whole.

ARCHAEOLOGICAL RESOURCES

The project will not likely adversely affect any known or predicted archaeological properties in the project area. Archaeological resources will be protected by adhering to procedures outlined in the Presidio Trust Programmatic Agreement. Archaeological monitoring of ground disturbing activities during construction will ensure that there are no adverse effects to known or predicted archaeological areas or any deposits that are inadvertently discovered during construction. An Archaeological Monitoring Plan will guide this monitoring once design is complete and before construction commences. Archaeological Treatment Plans for individual sites and the AMP will ensure that any discoveries are handled in accordance with all stipulations of the PTPA.

VISUAL RESOURCES

The project will improve the visual character of the project site through removal of construction fencing, covering exposed tunnels, revegetating staging areas, and recreating the bluff. Landscape design changes will be compatible with the existing natural and structural elements of the setting. Given their relatively small bulks, heights, and masses, and through adherence to established design guidelines, new structures will also be compatible with the natural and structural elements of the visual setting.

LIGHT AND GLARE

The project will minimize light pollution. Code-required lights will be high efficiency, low glare, downcast and shielded fixtures per the current California Building Energy Efficiency Standards California and LEED requirements for new exterior lighting. Site and parking lot lighting will be installed following the same principal concerns as building and path of travel lighting. The Trust will review both the interior

and exterior lighting designs to ensure consistency with PTMP policies regarding light and with guiding principles set forth in Trust standard measures for lighting. Best lighting practices will be reviewed to avoid light trespass into adjacent natural areas.

BIOLOGICAL RESOURCES

The project will have no effects on special-status plants or sensitive natural communities, including jurisdictional wetlands, as none occur within the project area. Measures identified in the PTMP ROD and VMP will be implemented to avoid or minimize temporary adverse effects related to the spread of non-native and invasive plant species, resident and migratory birds, roosting bats, and other resident wildlife species during construction. The project site's wildlife habitat value will increase through native plants in the designed landscape. Most practicable bird-safe building practices will minimize the potential for adverse effects on resident and migratory birds due to any new construction and new sources of lighting.

WATER RESOURCES

The project's water demand will increase the Presidio's annual consumption by an insignificant amount (approximately 1.3 percent). Landscapes will be planned, designed, installed, managed and maintained to promote the conservation and efficient use of water and to prevent the waste of this valuable resource. Water irrigation systems will allow for the future use of recycled water. Stormwater management practices will be integrated into the landscape and grading design plans to minimize runoff and to increase on-site rainwater retention. Multiple best management practices will be used to control erosion and prevent sediment from entering Crissy Field Marsh and the San Francisco Bay.

ENVIRONMENTAL SUSTAINABILITY AND CLIMATE PREPAREDNESS

The project will be consistent with Trust sustainability and climate preparedness priorities. Adoption of site-specific strategies to further the goals of the Trust's Climate Action Agenda will anticipate changes at the site and surrounding areas that may result from climate change. Incorporating sustainability considerations into resilience planning will also help prepare for and adapt to the effects of climate change. Irrigated turf will be limited to programmatic spaces, scaled to particular types of experience and activity. Irrigation systems will be installed to anticipate recycled water availability.

HAZARDOUS SUBSTANCES

The project will have no significant impacts to human health, safety and the environment due to hazardous substances because the risk of human exposure is low and precautionary measures will be implemented as necessary. Implementation of new site uses and soil disturbing construction in the Commissary/PX Land Use Control (LUC) area as part of the project will be subject to regulatory approval of planned land use changes and remedial actions (as required) in advance of construction. Should the land use include ecologic habitat and facilities considered sensitive uses, additional remediation to

remove and/or cap contaminated soil will ensure protection of human health and the environment. For areas where the LUC will remain in effect, the Trust will continue annual monitoring and reporting.

CUMULATIVE IMPACTS

The project, in combination with other cumulative projects, will have varying levels of beneficial and adverse effects depending on the resource and the individual project. In general, the projects will contribute to the Presidio's ongoing transformation into a welcoming, more visually interesting, accessible, and engaging environment that provides meaningful experiences for visitors from around the world. Vehicles associated with cumulative projects will increase the total number of peak hour trips at the Main Post and Crissy Field by approximately 7 percent on weekdays and 10 percent on weekends. However, with the adoption of TDM measures and implementation of intersection improvements, impacts will be reduced below significant levels. Parking at the Main Post and Crissy Field will be sufficient to accommodate demand, but due to seasonal variation in park visitation, parking supply may be exceeded in some areas on peak weekend days. Visitor opportunities and access to park resources will be expanded, and a wider audience will be engaged. Conditions will be expected to be busy on most weekdays and weekends with only minor crowding. However, even with application of visitation measures, visitors may be displaced to other recreational areas within the park or other nearby city or GGNRA sites where similar visitor experiences are available.

PUBLIC INVOLVEMENT

The Trust viewed public participation in the development of the project as critical to its success. The outreach program offered more numerous and frequent feedback opportunities than any other Presidio planning effort to date. Public outreach for the project was initiated on September 4, 2014 at a public forum that featured the release of creative visions by five renowned firms selected by the Trust to develop design concepts for the project. From the concepts that emerged from the design firms and ideas generated by the public during this early phase of the project, the Trust and JCFO explored and refined designs to develop the range of alternatives for environmental review. The Trust announced the beginning of public scoping pursuant to the NEPA on February 29, 2015 with the release of the notification of intent (Trust 2015d). At a March 21, 2015 workshop, the Trust presented 3 preliminary concept designs for the project, which formed the basis of the final concept design evaluated in the EA, and the two alternatives. The Trust accepted comments at a public Board of Directors meeting held on May 14, 2015 at which time the draft concept design was introduced, and presented the final concept design at a public Board of Directors meeting held on October 8, 2015. While scoping to assist in the preparation of the EA ended on June 1, 2015, comments directed toward the project were welcomed through early October 2015. Between September 2014 and October 2015, prior to circulating the EA, the Trust engaged over 40,000 individuals and received over 2,000 comments on the project.

The Trust made the EA available for public review on October 28, 2015 (Trust 2015e). The Trust's announcements invited public comment for a 45-day period, which was extended by 36 days (concluding January 19, 2016) in response to public comment (Trust 2015f). During the public comment period, the Trust held two informational workshops on November 4 and December 3, 2015 to provide participants the opportunity to learn more about the project and issues covered in the EA, and to provide comments. Additionally, the Trust offered eight site tours between October 30, 2015 and January 15, 2016.

By the close or shortly after the public comment period for the project that ended January 19, 2016, the Trust received three letters, five emails and four comment cards from 10 interested individuals, two organizations and one public agency.[1] Several of the comments were nonsubstantive, generally expressing support for the project, and therefore required no response.

Comment letters are available for review at the Presidio Trust and constitute part of the formal public record.

The Trust fully assessed all issues raised by the comments received during the review period. In response to the comments, the Trust affirms it will:

- continue to engage the public during the design process (Public Participation);
- monitor traffic volumes and intersection operating conditions, adjust transportation demand management (TDM) measures and make roadway improvements (Transportation);
- increase the frequency of PresidiGo as ridership increases (Transportation);
- collect and share visitor data at key locations and inside the Presidio Visitor Center to better understand visitation patterns to support ongoing management of the area (Visitation);
- modify the amphitheater design to make it less prominent within the landscape (Cultural Resources);
- ensure that all project features preserve or enhance historic views (Cultural Resources);
- adopt best practices to prevent the spread of pathogens and invasive plants during construction (Biological Resources);
- further increase water efficiency during the design process through more efficient irrigation systems, recycled water usage, onsite stormwater capture, and limiting turf wherever possible based on predicted visitor use (Water Resources); and
- explore options during the design process to reduce the traffic noise level in areas near the tunnel portals (Noise).

[1] Comments submitted by the National Park Service and the State Historic Preservation Officer (SHPO) on the preliminary finding of effect (Attachment 2 of the EA) and the supplemental design guidelines (Attachment 4 of the EA) were addressed as part of the National Historic Preservation Act Section 106 consultation process. The NPS and SHPO letters are provided in Attachment 3 of the EA.

A summary of and responses to the comments received during the public review period for the EA are provided in Attachment 6 of the EA. Minor text changes and revisions to the EA in response to the comments are provided in errata sheets in Attachment 7 of the EA.

AGENCY REVIEW

The Trust coordinated with the following agencies for their review of the project and to ensure compliance with any substantive environmental requirements, including consultation under the National Historic Preservation Act.

NATIONAL PARK SERVICE

As the manager of the adjacent parkland at Crissy Field and as a partner in interpretation, visitor services and programming for the Presidio at large, the National Park Service (NPS) was invited to collaborate closely on the project with the Trust from the outset. In its scoping letter to the Trust (NPS 2015), the NPS acknowledged the Trust's "widespread, thoughtful public engagement and outreach" and responsiveness to the "depth of public comment and input received." The NPS letter also:

- Supported the concepts being explored for the Presidio Visitor Center design for Building 210, and for expanding the Crissy Field Center and creating the Learning Landscape.
- Requested the effects on visual resources, visitation, water resources, transportation and parking, dark night sky, and climate change adaptation be addressed in the EA (refer to Section 4 in response).
- Supported the removal of Building 211 (Observation Post) and Building 610 (Sports Basement) as soon as possible.
- Expressed concern over the potential effect on access to and parking demand in Crissy Field (Area A) due to Trust projects.
- Informed the Trust of the planning process underway for "refreshing" (i.e., repairing and improving) Crissy Field (Area A).

Following its review of the EA, the NPS submitted comments requesting additional explanation and analysis with regard to visitation, transportation and natural resources (NPS 2016a). The NPS applauded the Trust on its "exemplary planning process" for the project and expressed confidence that its comments would be resolved in the FONSI, during follow-on design, and through continued collaboration. Responses to the NPS comments on the EA are provided in Attachment 6 of the EA.

PTPA SIGNATORY PARTIES

Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires the Trust to take into account the effect of its undertakings on historic and cultural resources, including the Presidio National Historic Landmark District (NHLD). As a result of the consultation for the PTMP, the Trust entered into a Programmatic Agreement, which was updated in 2014 (PTPA) (Trust 2014a), with the SHPO, the ACHP and the NPS (signatory parties). The PTPA provides a framework for reviewing different types of projects, and for consulting with other parties under certain circumstances. Following initiation of public scoping, the SHPO (Beason 2015) requested a list of contributing/non-contributing structures in the proposed area of potential effect (APE) and clarification on the locations of the Anza Esplanade and Presidio Promenade. The NPS issued a letter (NPS n.d.) that offered some detailed design comments on each of the preliminary concepts and the alternatives, as well as recommendations on projects to consider for the cumulative effects analysis. The Trust gave serious consideration to the comments by modifying the concept design and focusing the EA and preliminary finding of effect (FOE) analyses in response. Prior to circulating the EA and FOE, the Trust also forwarded the supplemental design guidelines to the signatory parties for their review and conducted outreach to Native American contacts that may be interested in the project.

In their comment letters on the FOE and the supplemental design guidelines (NPS 2016b and Office of Historic Preservation 2016a), the NPS and SHPO stated they did not concur with the Trust's preliminary finding of no adverse effect for the project. The NPS asked the Trust to modify the amphitheater and to provide more guidance for the structures in the Learning Landscape to ensure avoidance of adverse effect. The SHPO raised a number of concerns, including the appropriateness of the new plaza and the scale of other design elements within the landscape. The Trust followed up with the NPS and SHPO to resolve the outstanding issues and reached consensus on its finding of no adverse effect. The referenced NPS and SHPO emails and letters to the Trust and the Trust's conditional finding of no adverse effect letter (Trust 2017b) are provided in Attachment 3 of the EA.

PRESIDIO PARKWAY IMPLEMENTATION AGENCIES

The Trust provided copies of the EA to the three key regional transportation agencies for the Presidio Parkway project: the San Francisco County Transportation Agency, the Federal Highway Administration, and the California Department of Transportation.

No other Federal, State or local agencies chose to participate in the environmental review process for the project.

MITIGATION MEASURES TO AVOID OR MINIMIZE POTENTIAL ADVERSE ENVIRONMENTAL IMPACTS

The Trust commits to carrying out all practicable mitigation measures identified in the EA to avoid or minimize environmental impacts that could result from constructing the project. The mitigation measures are discussed in detail at the beginning of Section 4 (Environmental Consequences) and include all relevant avoidance, minimization, and/or mitigation measures adapted from the Doyle Drive, PTMP and Main Post Update Records of Decision (RODs), and measures informed by the EA review process and considered for impacts that by themselves were not considered significant. Mitigation measures include elements which will be integral components of the project's design, continued coordination with other public agencies as warranted, implementation of standardized best management practices during and following construction, and other possible efforts. As part of the decision to construct the project, the Trust will adopt a monitoring and enforcement program (MEP) provided in Attachment 8 of the EA to ensure that mitigation commitments are implemented. The Trust's Project Manager will be responsible for monitoring compliance with the MEP and the effectiveness of mitigation commitments. The status and results of mitigation monitoring will be made available to other agencies and the public upon request.

FINDING

The Trust has considered the information and analyses in the environmental assessment and supporting environmental documentation, the comments of agencies and the public, and the project's administrative record. Based on Trust regulations on environmental quality (36 CFR 1010), PTMP policies, monitoring, and experience, including prior significance determinations documented in previous NEPA decisions and the adoption of enforceable mitigation measures outlined in the EA, it is the determination of the Trust that the project is not a major federal action having the potential to significantly affect the quality of the human environment. There are no significant direct, indirect or cumulative effects on public health or safety, sites listed on the National Register of Historic Places, or other unique characteristics of the project area, with the exception of cumulative transportation impacts, which will be mitigated below significant levels. The project is neither scientifically nor publicly controversial. Implementation of the project will not involve unique or unknown risks, cause loss or destruction of noteworthy park resources, or violate any Federal, State or local law. Implementation of the project is not precedent-setting nor will it automatically trigger other actions which may require environmental impact statements. Through the NHPA Section 106 process to include the parameters of the Conditional Finding of No Adverse Effect (Trust 2017b), and in accordance with Section 110 of the NPHA, the Trust has, to the maximum extent possible, undertaken such planning and actions as may be necessary to minimize harm to the landmark. The project is fully consistent with the BCDC's enforceable policies. Therefore, in accordance with the

National Environmental Policy Act of 1969 and regulations of the Council on Environmental Quality, an environmental impact statement will not be prepared. The Trust will implement the project, construction of the Presidio Tunnel Tops, at the earliest possible time.

RECOMMENDED:

12/12/17

John Pelka
Compliance Manager, Presidio Trust

Date

APPROVED:

12/12/17

Jean Fraser
Chief Executive Officer, Presidio Trust

Date

ATTACHMENT

2 FINDING OF EFFECT

JAMES CORNER FIELD OPERATIONS

PRESIDIO

TUNNEL TOPS

FINDING OF EFFECT

PARTNERS

The Presidio Trust is the lead agency for this project, directing the planning, design, and construction effort and managing community outreach and engagement. The Golden Gate National Parks Conservancy, the non-profit partner to the Trust and the National Park Service, serves as the philanthropic and community engagement partner and supports park restoration and enhancement, education, and visitor service projects and programs. The National Park Service is engaged as the manager of the adjacent parklands at Crissy Field and as a partner in interpretation, visitor services and programming.

PRESIDIO TUNNEL TOPS

FINDING OF EFFECT
DECEMBER 2017

Presidio Trust

EXECUTIVE SUMMARY

The Presidio Tunnel Tops project is located on a 14-acre site to the north of the Main Post in the heart of the Presidio of San Francisco, a national park site and a National Historic Landmark District (NHLD). The project primarily consists of landscape, hardscape and public program development, along with some limited new construction, atop the newly-built bluff feature delivered by the Doyle Drive Replacement (Presidio Parkway) Project. In this document, the Presidio Trust (Trust) is evaluating the effects of the Tunnel Tops project on historic resources within the NHLD under the terms of its Programmatic Agreement (PTPA, 2014), which governs the agency's compliance with the National Historic Preservation Act (NHPA).

Concurrently, the Trust is evaluating alternatives to the undertaking in the October 2015 Tunnel Tops Project Environmental Assessment (EA) for compliance with the National Environmental Policy Act (NEPA). Complementing the NEPA and NHPA analysis, the Trust is also providing for review of the proposals through an extensive public outreach program, alongside consultation with parties to the PTPA, which was initiated in August 2014.

As a result of these public processes to date, the Trust has identified a preferred alternative in the EA that is the "undertaking" analyzed in this Preliminary Finding of Effect report (FOE). The Trust has relied upon four planning documents to generate this analysis, each of which guides development in this area of the park: the Main Post Planning and Design Guidelines, the Mid-Crissy Area Design Guidelines, the Main Post Cultural Landscape Report, and the Doyle Drive Built Environment Treatment Plan and Architectural Criteria Report. Additionally, the Trust has developed new Supplemental Design Guidelines for the Tunnel Tops project (supplemental guidelines, 2015) in order to help direct new construction anticipated as part of the undertaking. A draft copy of these supplemental design guidelines is attached to this document for reference and comment.

The EA and the preliminary FOE for the Tunnel Tops project are available for a 45-day comment period. Comments received on the undertaking and the preliminary FOE by signatory and concurring parties to the PTPA and the public will be addressed through consultation, with the goal of obtaining concurrence with the signatories on its findings. An EA and associated Finding of No Significant Impact (FONSI) as well as the final FOE are anticipated in the first quarter of 2016. Should the Trust secure signatory party concurrence on the FOE, its Section 106 responsibilities will be complete per Stipulation IV.C.2.d.1. of the PTPA. Failure to reach concurrence will result in further consultation on the undertaking according to the terms of Stipulation IV.C.2.d.2. A final decision on any of the proposals will not be made until both the NEPA and NHPA processes conclude. A Board Resolution will memorialize the Trust Board of Director's decisions for the Tunnel Tops project.

The undertaking assessed below was developed through an iterative process with many project changes that were in response to comments from the public and consulting agencies. Changes in the project are primarily related to the disposition of Buildings 211 and 603, the treatments of various landscape and hard-scape designs, and the potential impacts to archaeological resources. Throughout the process, comments from interested parties and consulting agencies have positively influenced the project. The Presidio Trust is grateful for the participation, professionalism, and enduring contributions of the participants to this process.

This preliminary FOE describes the direct and indirect effects of each action included in the undertaking. It also assesses the combined effects of all of the actions in the undertaking as well as the cumulative effects of all applicable actions within the NHLD.

In sum, the Trust finds that the undertaking will not diminish the integrity of individual resources within the Presidio or the NHLD as a whole. The Trust further concludes that cumulative projects would have no direct or indirect adverse effect, especially when added to the aggregate effects of past individual projects and the overall level of change within the NHLD.

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LIST OF ACRONYMS

ACHP	Advisory Council on Historic Preservation
APE	Area of Potential Effects
Caltrans	California Department of Transportation
CFR	Code of Federal Regulations
CLA	Cultural Landscape Assessment
EA	Environmental Assessment
FOE	Finding of Effect
FONSI	Finding of No Significant Impact
GIS	Geographic Information System
GGNRA	Golden Gate National Recreation Area
NAHC	Native American Heritage Commission
NEPA	National Environmental Policy Act
NHL	National Historic Landmark
NHLD	National Historic Landmark District
NHPA	National Historic Preservation Act
NPS	National Park Service
NRHP	National Register of Historic Places
OQMG	Office of the Quartermaster General
PTMP	Presidio Trust Management Plan
PTPA	Presidio Trust Programmatic Agreement
PWRO	National Park Service, Pacific West Regional Office
SHPO	State Historic Preservation Officer
Trust	Presidio Trust
WPA	Works Progress Administration

CHAPTER 1

INTRODUCTION

1.1 PROJECT OVERVIEW AND REGULATORY CONTEXT

The Presidio Trust (Trust), working with the Golden Gate National Parks Conservancy (Conservancy) and the National Park Service – Golden Gate National Recreation Area (NPS), has proposed an undertaking that includes landscaping, building rehabilitation, new construction, and programming for 14 acres of new, publicly accessible parkland on top of the reconstructed Doyle Drive in order to improve physical and visual connections between the historic Main Post and Crissy Field. The undertaking would demolish Building 211, a non-contributor to the National Historic Landmark District (NHLD), and construct a building of equal size nearby. The undertaking would also rehabilitate and expand Building 603, a contributor to the NHLD. Finally, the project would add new landscape elements, including the 'Zocalo,' Anza Esplanade, Learning Landscape, Bluff Walk and other circulation features.

The Trust, Conservancy, and NPS hope to accomplish the following with this project:

- Honor the significance of the Presidio
- Offer a magnificent experience of the Golden Gate
- Welcome all
- Integrate the natural landscape of Crissy Field and the cultural landscape of the Main Post
- Create the best place to begin a Presidio experience
- Provide exceptional environmental learning opportunities

The Finding of Effect (FOE) is developed in compliance with Section 106 of the National Historic Preservation Act (NHPA) and applies the "Criteria of Adverse Effect," set forth in 36 Code of Federal Regulations (CFR) 800.5, to historic properties within the area of potential effects (APE) for the undertaking. This document also supports the Trust's compliance with 36 CFR 800.10, "Special Requirements for Protecting National Historic Landmarks."

This report concludes that the parklands project would have no adverse effect on historic properties in the project's APE pursuant to Stipulation IV.C.2.d.1 of the PTPA, and would result in no cumulative adverse effect on the National Historic Landmark District (NHLD). Upon concurrence with this finding through consultation with the

FIGURE A: ALTERNATIVE 3 (PROPOSED PROJECT) — NEW PRESIDIO PARKLANDS (UNDERTAKING)

California State Historic Preservation Officer (SHPO) and the National Park Service Pacific West Regional Office (PWRO) and the Golden Gate National Recreation Area, the Trust will record this outcome in the administrative record for the project along with any terms and conditions thereof, after which its responsibilities for consultation under the NHPA will be complete. Section 2 provides a description of the historic properties located with the APE. Section 3 describes the application of the criteria of adverse effect to historic properties and the conclusions of this document. Figures depicting the project vicinity, location, plan, photographs of affected resources and visual simulations are located throughout the document.

Analysis of effects associated with Doyle Drive, as well as previous and any anticipated future projects are included in the cumulative effects analysis (Section 4.4).

1.2 SUMMARY OF SECTION 106 COMPLIANCE ACTIVITIES TO DATE

Activities under Stipulation IV of the PTPA to date have included identification of the project as an undertaking that involved new construction (IV.A.2.c) and initiating consultation under this stipulation; establishing the project Area of Potential Effects (APE) and identifying affected historic properties therein (IV.B.4); and, distributing consultation packages to the SHPO and NPS and concurring parties in coordination with its public outreach process under NEPA (IV.C.2). This package constitutes a determination of effect and other supporting materials as described under Stipulation IV.C.2.d.1.

1.2.1 AREA OF POTENTIAL EFFECTS AND IDENTIFICATION OF HISTORIC PROPERTIES

The APE for the proposed undertaking has been identified as three Presidio planning areas: the Main Post Planning Area, the Letterman Planning Area, and the Crissy Field Planning Area, which comprise the majority of the northern coastal portion of the San Francisco NHLD (Figure B, *Area of Potential Effect for the Parklands Project*). The APE was proposed on March 20, 2015 by the Trust; the SHPO concurred that the APE was adequate in an email dated May 7, 2015.

The APE contains 271 historic properties, including 198 contributing buildings and sites, 57 contributing road corridors, and 16 predicted archaeological sites within Area B, all of which are listed in the National Register of Historic Places (NRHP) and are considered historic properties under Section 106. There are also 26 non-contributing buildings or structures in the APE. A list of all contributing and non-contributing resources in the APE are provided in Section 2.3

The parklands project site (project site) is a much smaller area consisting of 14 acres straddling the Main Post and Crissy Field Planning Districts, and almost entirely within the area affected by the Presidio Parkway project limits. Of the 271 contributing or eligible historic properties in the APE, 24 historic properties are within or in close

proximity to the parklands project site.[1] The contributing resources that are within the project site and have the potential to be directly or indirectly affected are listed in Tables 2.3.1 and 2.3.2 of Section 2 below.

The entire NHLD, including the area encompassed by the APE, has been the subject of a variety of surveys. The Presidio was designated a National Historic Landmark (NHL) in 1962 and listed in the NRHP in 1966. The original Presidio of San Francisco NHL designation from June 13, 1962 included the entire former Army reserve (Areas A and B[2]), which encompasses approximately 1,500 acres. The original site of El Presidio, including four Spanish cannons and the Officers' Club were the only resources recommended for NHL classification. In 1976, a partial survey of the landmark expanded the list of contributing buildings to 277, but a complete survey of all buildings within the NHLD did not take place until 1993. The Keeper of the National Register approved the "upgraded NHL documentation" that was prepared and submitted by the NPS in 1993.[3] The 1993 nomination stated that the Presidio possesses national significance under combined NHL Criteria 1, 4, 5, and 6, and that it possesses national significance under combined NRHP criteria A, C, and D.[4] The 1993 update defined the period of significance for the Presidio of San Francisco NHLD as 1776-1945 and identified 662 contributing buildings, sites, structures, and objects. In January of 2008, the Trust initiated an update to the NHL form, which evaluated the Cold War period

1 This total includes 19 buildings, three archaeological sites, the Main Parade and one historic roadway.

2 In 1994, when the U.S. Army transferred jurisdiction of the Presidio to the NPS, it became part of the Golden Gate National Recreation Area (GGNRA). In 1998, management of the Presidio was divided between two federal agencies: the Presidio Trust, the agency responsible for oversight of 80 percent of the Presidio delineated as Area B; and the NPS, which is responsible for management of the coastal portions of the park (the remaining 20 percent delineated as Area A).

3 NPS, "Presidio… Registration Forms," October 1993; and NPS Land and Community Associates, "Cultural Landscape Report, Work in Progress" November 1992.

4 National Register Criteria applicable to the Presidio, as indicated in the 1993 NHL Update, are defined as criteria: A) Property is associated with events that have made a significant contribution to the broad patterns of our history; C) Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction; D) Property has yielded, or is likely to yield information important in history or prehistory.

National Historic Landmark Criteria applicable criteria to the Presidio, as indicated in the 1993 NHL Update are defined as: 1) That are associated with events that have made a significant contribution to, and are identified with, or that outstandingly represent, the broad national patterns of United States history and from which an understanding and appreciation of those patterns may be gained; 4) That embody the distinguishing characteristics of an architectural type specimen exceptionally valuable for a study of a period, style or method of construction, or that represent a significant, distinctive and exceptional entity whose components may lack individual distinction; 5) That are composed of integral parts of the environment not sufficiently significant by reason of historical association or artistic merit to warrant individual recognition but collectively compose an entity of exceptional historical or artistic significance, or outstandingly commemorate or illustrate a way of life or culture; 6) That have yielded or may be likely to yield information of major scientific importance by revealing new cultures, or by shedding light upon periods of occupation over large areas of the United States. Such sites are those which have yielded, or which may reasonably be expected to yield, data affecting theories, concepts and ideas to a major degree.

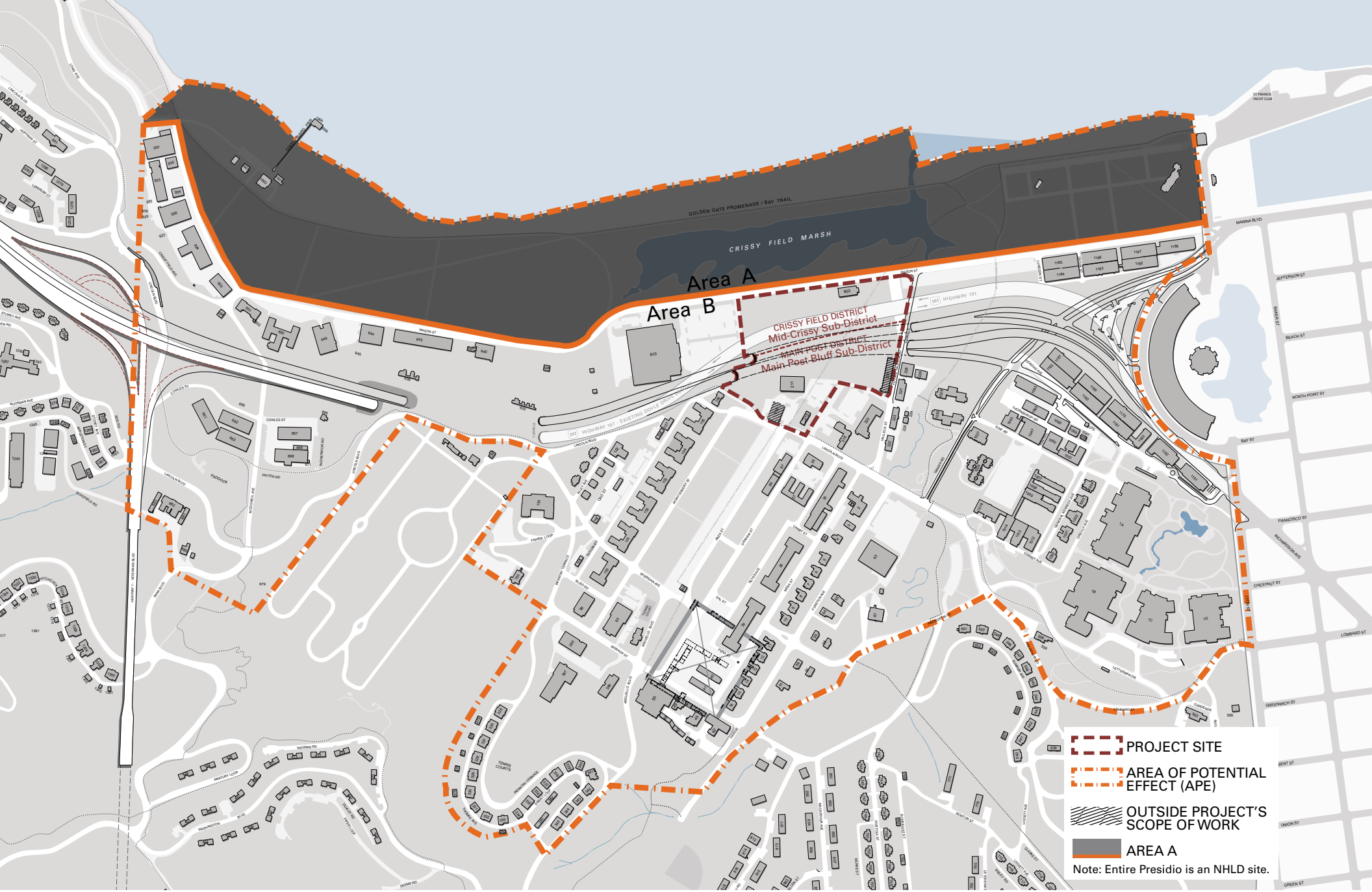


FIGURE B: AREA OF POTENTIAL EFFECT

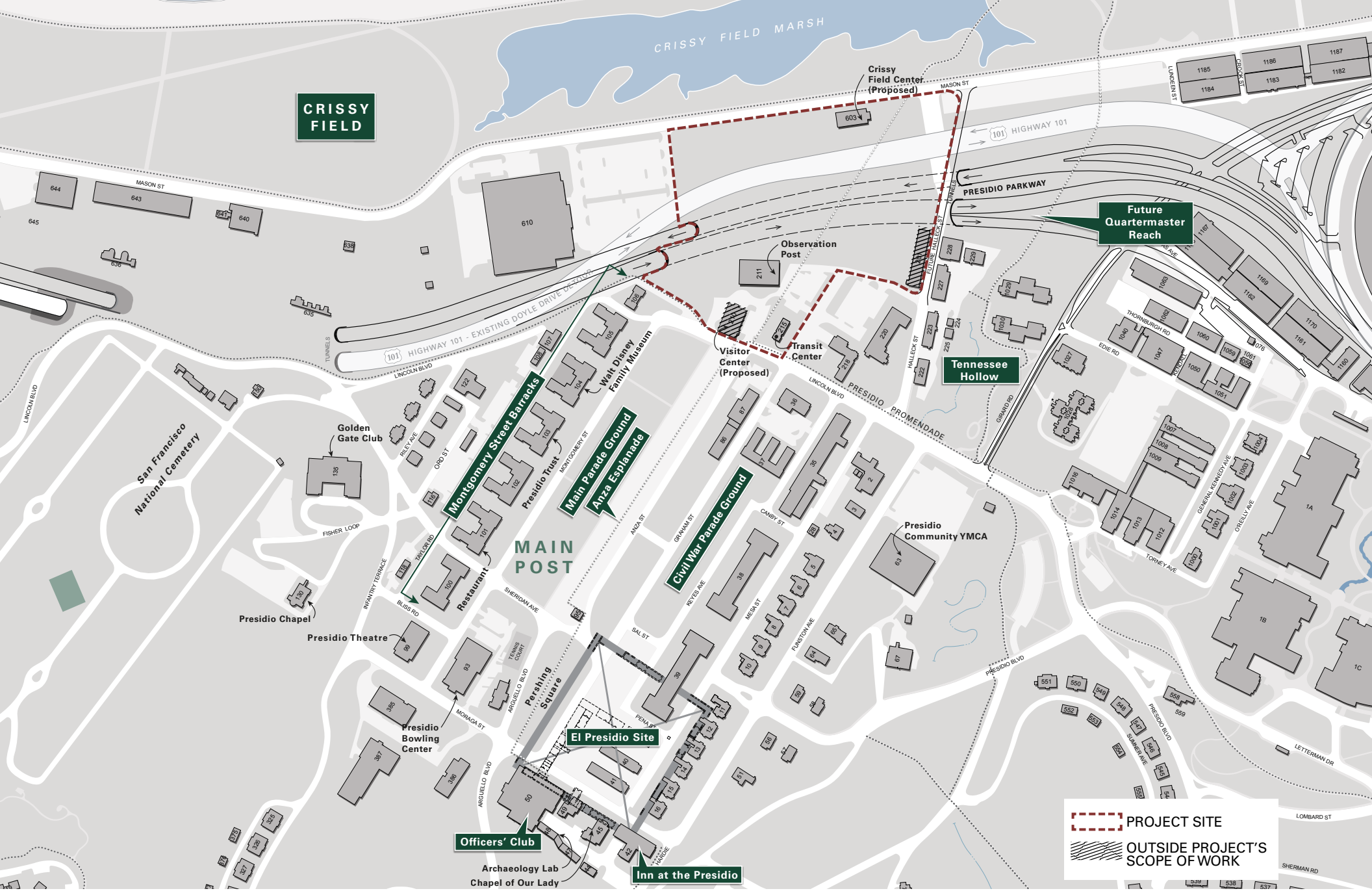


FIGURE C: PROJECT SITE

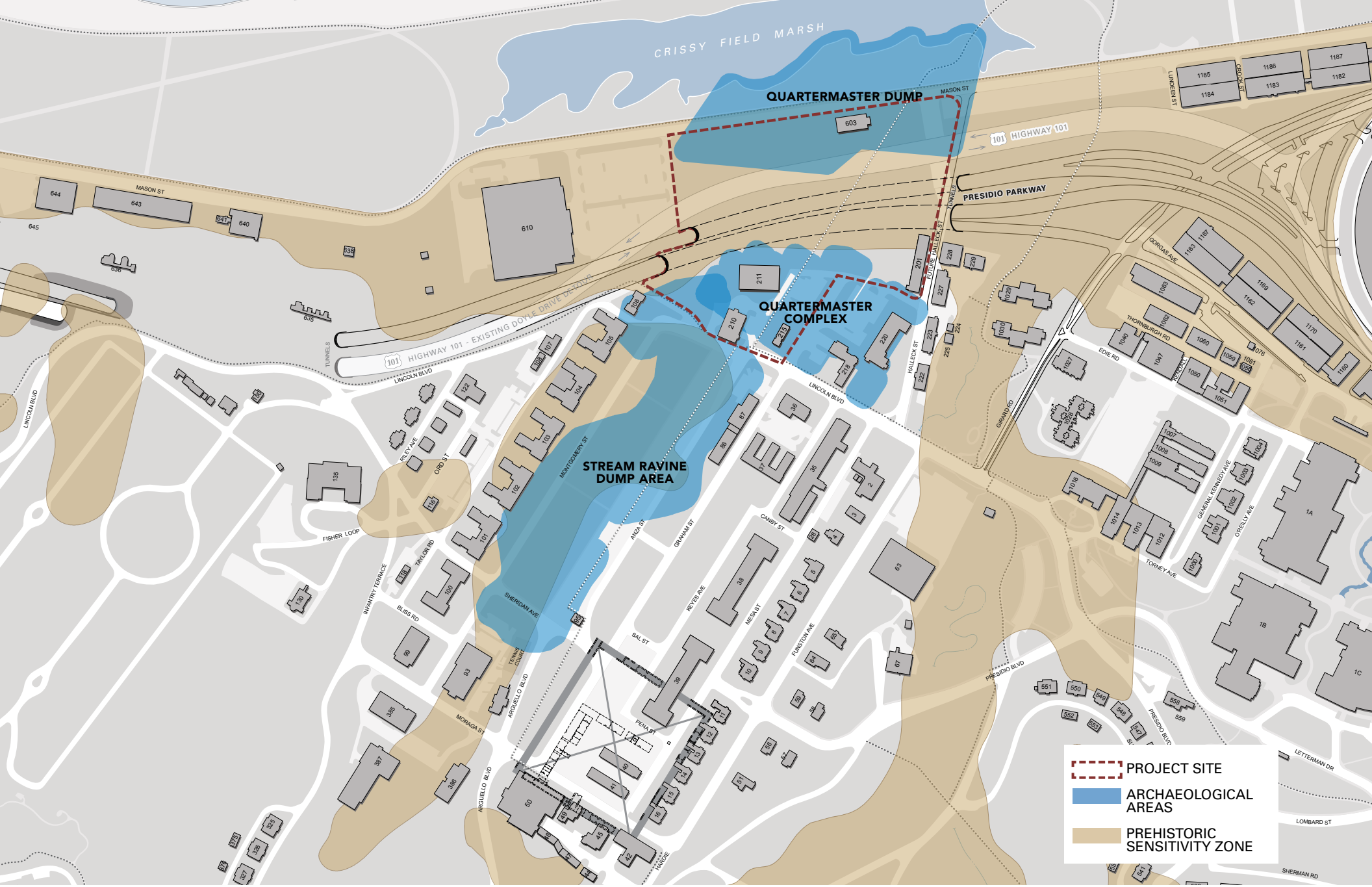


FIGURE D: ARCHAEOLOGICAL AREAS

for inclusion in the NHL. That effort resulted in a proposed extension of the period of significance to 1958 and addition of 116 resources (mostly post-War housing in the southern and western parts of the park) to the NHL forms. Buildings in the APE from this era include 385 and 386 (Main Post) and 924, 649 and 644 (Crissy Field). This update remains in draft form pending further review by the NPS; properties identified as contributing therein are considered historic under the terms of the PTPA.

Contributing archaeological areas of the NHLD were predicted through the use of historic maps and documentary evidence as part of the 1993 NHL Update. Subsequent archival research, GIS modeling and excavation have provided additional information about predicted archaeological areas of the NHLD. In certain cases, subsurface testing and other excavation efforts have confirmed the presence of the predicted resources and enabled the Trust and NPS to characterize archaeological areas of the NHLD. The project APE contains an array of archaeological resources: the Quartermaster Complex, Quartermaster Dump and Stream Ravine Dump archaeological areas, all of which contribute to the NHLD, are within or directly adjacent to the project site. Additionally, a portion of the project site is considered to be sensitive for prehistoric archaeological deposits (Figure D).

1.2.2 PUBLIC PARTICIPATION

Section 106 provides an opportunity for members of the public with a demonstrated interest to participate in the process and comment on the project as consulting parties. Under the terms of the PTPA, the Trust initiated consultation with signatory parties (National Park Service PWRO and GGNRA and the California SHPO), a concurring party (National Trust for Historic Preservation) and the public on August 29, 2014. Consistent with direction in the PTPA, the Trust has utilized the Council on Environmental Quality (CEQ)/Advisory Council on Historic Preservation (ACHP) Guidance "Road Map for Coordination" between its NEPA and NHPA processes. To date, the Trust has held over two dozen public meetings, workshops and site walks with over 2,500 participants, generating nearly 2,000 comments. The Trust also hosted a project website and information gallery in its headquarters since the project was launched. The amount of interest, and engagement around the parklands project has enabled the Trust to conduct a robust consultation, with a great deal of public participation and opportunities for comment; the Trust will continue to brief the public on its findings and conclusions under the terms of the PTPA through the end of its consultation process.

Since initiation of the consultation, the Trust has periodically briefed PTPA parties via email and other consultation packages including relevant information on the proposed undertaking. The Trust will meet with signatory parties following the close of the public comment period on this preliminary FOE to discuss comments and findings, and aim to reach concurrence on a determination of effect. Alongside the formal consultation meetings, the Trust has hosted a series of public workshops at the Presidio and in neighborhoods across San Francisco, as well as a full-

time public information gallery in building 103 (Trust headquarters) on the Main Post. A public open house focused on the EA and this document will take place on November 4, 2015 to provide further opportunity for public comment, and discussion regarding the undertaking with Trust staff.

The Trust provided a detailed summary of public comments on the design phase of the project (January – March 2015) as part of its second consultation package to the NPS, SHPO and NTHP. This information will be updated following the close of public comment on the EA and this document in December.

The following is a chronological summary of the consultation activities related to the parklands project (undertaking) under the PTPA. Meeting dates, mileposts on the NEPA review calendar and dates of distribution for consultation packages are all detailed below.

- August 29, 2014 – Consultation initiated. Request for Comment on the Team Selection Process, first consultation package mailed
- February 19, 2015 – Notice of Intent to prepare an Environmental Assessment issued
- March 20, 2015 – Second Consultation package mailed with proposed Area of Potential Effect, Concept Designs and Alternatives
- May 7, 2015 – Review period for the Preliminary Concept Designs and Alternatives ends
- June 1, 2015 – NEPA scoping/public comment period closes
- June 21, 2015 –Revised Concept Designs, conceptual proposals for expanding building 603, Learning Landscape renderings circulated (email)
- September 11, 2015 – Draft Supplemental Design Guidelines for the New Presidio Parklands Project circulated to signatory parties for a 30-day comment period per Stipulation III.B.2 of the PTPA
- October 8, 2015 – Public Board Meeting held to present the final concept design, accept comments from the public
- October 23, 2015 – Third Consultation package mailed with Final Concept Design, Preliminary FOE, Draft Final supplemental guidelines, and EA
- November 4, 2015 - Public Open House on the EA and Preliminary FOE
- December 2015 – Anticipated close of public comment on the Draft Schematic Design, EA and Preliminary FOE

- December 2015/January 2016 – Consultation meeting among PA parties to discuss Preliminary FOE, develop any applicable conditions needed to reach concurrence on a finding of "no adverse effect"
- TBD early 2016 – Reach concurrence on finding of "no adverse effect", agree upon any conditions, execute FONSI

1.2.3 NATIVE AMERICAN CONSULTATION

On April 21, 2015 the Trust contacted the Native American Heritage Commission (NAHC), requesting a search of its Sacred Lands Database and a list of contact information for local Native American representatives, receiving a reply on July 28. The NAHC provided the Trust a list of interested Native Americans in San Francisco County. A letter was sent, by the Trust, to all interested Native American individuals and organizations on the list from the NAHC on August 25, 2015 describing the undertaking and the archaeological context within the APE. The letter was sent to the following individuals and/or organizations:

- Jakki Kehl
- Linda G. Yamane
- Irene Zwierlein, Chairperson – Amah/Mutsun Tribal Band of San Juan Bautista
- Michelle Zimmer – Amah/Mutsun Tribal Band of Mission San Juan Bautista
- Tony Cerda, Chairperson – Coastanoan Rumsen Carmel Tribe
- Ann Marie Sayers, Chairperson – Indian Canyon Mutsun Band of Costanoan
- Rosemary Cambra, Chairperson – Muwekma Ohlone Tribe of the San Francisco Bay Area
- Andrew Galvan – The Ohlone Indian Tribe
- Ramona Garibay, Representative – Trina Marine Ruano Family

No written responses to the letter were received. In September/October 2015, phone calls were made to each party. These phone calls succeeded in reaching two of the parties; multiple attempts were made to call those that were not reached. Comments received over the phone were transcribed and entered into the administrative record.

Information about the undertaking and the compliance process was also featured in the June 2015 "Native Update" newsletter distributed to members of the Ohlone community by the National Park Service – Golden Gate National Recreation Area.

1.3 DESCRIPTION OF THE UNDERTAKING: NEW PRESIDIO PARKLANDS (ALTERNATIVES 1 AND 2, AND PREFERRED ALTERNATIVE)

The undertaking includes programmatic, architectural, landscape, parking and pedestrian enhancements atop the recreated Main Post bluff that will be delivered by the Presidio Parkway project.

The parklands project has the potential to become one of the most distinctive destinations in the country, attracting a broad cross-section of local, national, and international visitors. The project is expected to offer a high quality park experience and feature an array of visitor-serving amenities and activities. The following three alternatives are analyzed in the project EA (to which this document is an attachment), each providing for different uses, intensity of uses, and visitor experience.

1.3.1 ELEMENTS COMMON TO ALL ALTERNATIVES.

The following elements or features are based on Trust planning assumptions, management direction or policies and would be incorporated into the project regardless of the alternative selected:

- The amount of fill over the tunnels would be coordinated with the California Department of Transportation (Caltrans) based on requirements of the Vegetation Management Plan (Doyle Drive Environmental Impact Statement/Report (EIS/R),1 page 2-59).
- The form of the historic bluff between the Main Parade and Crissy Field would be evoked and the physical and visual connectivity would be maximized [Doyle Drive Built Environment Treatment Plan (BETP), page 8-2].
- The visual link between the Main Post bluff as seen from Crissy Field would be restored to preserve and enhance views [BETP, page 9-15 and Doyle Drive Architectural Criteria Report (DDACR), page 28].
- The top of the bluff would meet the existing grades at the Main Parade (DDACR, page 28).
- Permanent drainage features would be installed to allow groundwater to flow easily from the northern upgradient areas, under the tunnel, toward the Bay. Soil moisture on the north side of the tunnel would be similar to existing conditions (Doyle Drive EIS/R, page 3-168).
- The bluff would be used as a vegetative transition between the upper and lower post, and plantings would be low in height, low maintenance, and evoke the historic feeling of the bluff (BETP, page 9-15 and DDACR, page 28).
- All areas affected by construction activities would be re-vegetated following agreed-upon design guidelines to their appropriate native vegetation in naturalized areas or appropriate ornamental vegetation in landscaped areas (Doyle Drive EIS/R, page K-12).

- The Presidio Promenade would be incorporated into the project design and several pedestrian connections from the Main Post to Crissy Field would be provided with at least one accessible route (BETP, page 9-15 and DDACR, page 28).
- Building 210 would be rehabilitated as the Presidio Visitor Center in a separate action and Building 215 (Transit Center) would be retained.
- Building 201 would be returned to the site of the original building following completion of roadway construction activities and rehabilitated as part of the Presidio Parkway project (Doyle Drive EIS/R, pages 3-23 and 3-148).
- The project design would respect existing constraints, including loading and structural limitations over the tunnel. Cut and fill on the bluff would be balanced in order to reduce the need to import soils while maximizing space for overlooks and sculpting the bluff.
- Landscape design and new construction would follow direction in applicable planning and design guidelines, including Mid Crissy Area Planning & Design Guidelines, Main Post Planning & Design Guidelines, Main Post Cultural Landscape Report, and the draft Supplemental Design Guidelines for the New Presidio Parklands Project (October 2015).

1.3.2 ALTERNATIVE 1 – PRESIDIO TRUST MANAGEMENT PLAN UPDATE

The PTMP Update Alternative is the baseline or "no-action alternative" that was evaluated in the Doyle Drive EIR/S and anticipated in the 2002 PTMP and 2010 Main Post Update to the PTMP.

- The PTMP Update Alternative would be an open, largely undifferentiated landscape that is planted primarily with native vegetation. The site would accommodate individuals and small groups.
- Paths would provide pedestrian north/south and east/west access.
- The Crissy Field Center (Building 603) would remain unchanged and the surrounding landscape would be largely native plants.
- The Observation Post (Building 211) would be reused for office space.

Key elements: Paths, expanse of native plantings, 35,270 square feet of building space, and 124 parking spaces

1.3.3 ALTERNATIVE 2 – PRESIDIO PARKWAY

Building on the analysis contained in the Doyle Drive EIS/EIR, the Presidio Parkway Alternative responds to the Doyle Drive Built Environment Treatment Plan and is consistent with the Doyle Drive Architectural Criteria Report.

- The Presidio Parkway Alternative would be an open and diverse landscape with differentiated areas that accommodate individuals, families, and groups of different sizes. The focal point of the alternative would be a large, wide promontory that accommodates larger groups for special events as well as informal gatherings. There would be a range of opportunities for interpretation and learning.
- A variety of paths would provide east/west and north/south access as well as different ways to traverse and scale the bluff.
- The Observation Post (Building 211) would be retained for public uses.
- The Crissy Field Center (Building 603) would be retained for youth programming and the adjacent landscape would be largely native plants.

Key elements: Gardens, lawns, and native plantings; visitor-serving plaza, central promontory with group fire pit, and areas to gather and sit; areas for programming; 35,270 square feet of building spaces; and 87 parking spaces.

1.3.4 ALTERNATIVE 3 – NEW PRESIDIO PARKLANDS (UNDERTAKING/PREFERRED ALTERNATIVE)

The New Presidio Parklands Alternative (Final Concept Design) is the "preferred alternative" developed by James Corner Field Operations (JCFO) in partnership with the parklands project team, and emerged from the design submitted during the "Imagine" phase and subsequent public input. Three concept designs responding to public input received to date have been coalesced into a single proposed design (undertaking), described below:

- The undertaking would support a range of group sizes as well as programs and experiences, from individual pursuits and small gatherings to larger social activities and special events, in diverse landscapes and settings.
- The Anza Esplanade would be extended to connect the Main Post to a Central Overlook, a central viewing and gathering point.
- The Observation Post (Building 211) would be demolished and replaced with the approximately 9,300 square-foot New Observation Post. The new building is conceived as an indoor-outdoor space ideal for shelter and events, including celebrations, ceremonies and meetings.
- A new plaza (Zocalo) would function as a main social and multi-functional arrival and gathering plaza between the Transit Center and the Visitor Center.
- A Cliff Walk would follow the edge of the embankment and connect visitors to the wider landscape.
- Three overlooks would be designed as simple, battered, cast-in-place concrete walls, resembling both the historic batteries along the coast and recently constructed overlooks in the Presidio.

- A Terraced Amphitheater stepping down from the Central Overlook would offer extraordinary Bridge views, provide space for gathering, orientation and programming, and connect the Central Overlook to the landscape below.
- A fully accessible Bluff Walk would traverse the embankment and connect the bluff top to Mason Street and the Learning Landscape. Stairs near the West Overlook would also connect down to the Learning Landscape.
- The Learning Landscape, which would include a renovated Crissy Field Center, new Field Station and Classroom buildings to house additional program space. The new buildings would not exceed 7,500 square feet in total and no single building would exceed 5,800 square feet.

Key elements: Lawns, gardens and meadows; pathways for strolling; nooks for seating and small gatherings; three overlooks; a central interpretive feature; 43,073 square feet of building space; and 53 parking spaces.

CHAPTER 2

IDENTIFICATION OF HISTORIC PROPERTIES

2.1 SAN FRANCISCO PRESIDIO NATIONAL HISTORIC LANDMARK DISTRICT AND APE

There are 778 contributing or eligible historic properties in the Presidio NHLD. These contributing resources and their character-defining features are described in the 1993 NHL form and in the draft 2008 NHL update.

The NHL criteria were established to assess properties of national significance that possess "exceptional value to the nation." The NHL criteria for evaluation are more stringent than those for listing a property in the NRHP. Properties associated with important historic events, for example, must be outstandingly represented by that property to qualify as an NHL. NHLs that are important as collective entities must be shown to be important for their collective association with a nationally significant event, movement, or broad pattern of national development. If they include archaeological resources, such as the Presidio NHLD, those resources must be of major scientific importance. Furthermore, the NHL program was established to "encourage the long range preservation of nationally significant properties."[5]

The description of historic properties in an FOE document typically includes information on the criteria for which each historic property is eligible, levels and periods of significance, property boundaries, and contributing and non-contributing elements. Among the variety of reports and studies prepared about the Presidio, the updated NHL documentation that the NPS prepared in 1993 provides a comprehensive source for this information.

The NPS' 1993 NHL documentation, approved by the Keeper of the National Register, summarizes the Presidio NHLD's significance criteria and level of significance as follows:

> *The Presidio of San Francisco possesses national significance under combined National Historic Landmark Criteria 1, 4, 5, and 6. The property is composed of a wealth of historic, architectural, and archaeological resources that collectively comprise a distinctive entity of exceptional historic significance (Criteria 4, 5, and 6) and whose archaeological study can amplify our understanding of those periods and peoples under-represented in the existing historical record. As a vast district entity, the Presidio possesses exceptional value in*

[5] Code of Federal Regulations, Title 36, Part 65.1 and 65.2; and National Park Service, "How to Apply the National Register Criteria for Evaluation," National Register Bulletin 15 (Washington, D.C.: US GPO, 1991, updated through 2002), 50-51.

illustrating the history of the United States through its association with important historic events and its outstanding representation of patterns of national development through multiple periods (Criterion 1). (Similarly, the Presidio possesses national significance under combined National Register Criteria A, C, and D. Criterion C relates to the property's distinction as a district entity, and Criterion A relates to the district's association with events and broad patterns of history, and D relates to information potential for both historic and anthropological research to be found in the Presidio's historic archaeological resources.)[6]

The 1993 NHL documentation provides a seven-page summary statement of significance outlining the Presidio's history as the oldest Army installation in the American West and as one of the longest garrisoned posts in the country. More recently, the Presidio NHLD's significance has been summarized as:

…its association with a number of important historic events and people related to Spanish-colonial California, the development of the American West, U.S. relations and cross cultural exchange with the Pacific Rim, and the growth and development of the United States Army. Its significance is further based on its unique ensemble of military architecture, fortifications, and landscape design from every major period from the Civil War on as well as archaeological resources that hold important information about the earlier historic and pre-historic use of the site.[7]

The 1993 nomination states that the Presidio's period of significance is 1776-1945 and 1951. Section 7 (Description) and 8 (Statement of Significance) describe the development of the post as occurring in roughly eight historic eras: Spanish-Mexican Settlement, 1776-1846; Early United States Occupation, 1846-1860; Civil War, 1861-1865; Indian and Military Affairs, 1866-1890; and Nationalistic Expansion, 1891-1914; World War I, 1915-1918; Military Affairs between Wars, 1919-1940; and World War II, 1941-1945, and 1951 because of the important military pacts signed on post that year.[8] The nomination discusses which historic themes and sub-themes are significant under NHL Criteria 1, 5, and 6 for the Presidio's association with important events, as an important collective entity, and for its archaeological/anthropological importance.

The draft 2008 Update proposes to extend the period of significance to 1958, and identifies 110 resources as eligible as contributors to the NHLD (105 buildings, 11 structures); the resources are primarily Cold War-era housing located in the Baker Beach, East Washington and Upper Portola residential neighborhoods. Cold War-era resources identified under the 2008 Update within the APE include buildings 385 and 386 (Main Post) and 924,

6 NPS, "Presidio… Registration Forms," 8-7.

7 Presidio Trust, "Principles for the Future: A Cultural Landscape Assessment of the Main Post," September 2002, 2.

8 NPS, "Presidio… Registration Forms," 4 to 10, 7-61 to 7-162, and 8-1 to 8-7.

649 and 644 (Crissy Field). The 2008 document only analyzed changes to the Presidio from 1945-1994; it did not examine resources or historic periods prior to 1945 for re-evaluation.[9]

The Presidio NHLD contains approximately 1,500 acres. The boundary justification for the Presidio NHLD is as follows:

> *The historic district of the Presidio of San Francisco is composed of those lands referred to as the military reservation of the Presidio, including the lands of the historic Marine Hospital west of Mountain Lake, which was originally a part of the military reservation. Offshore submerged lands are also included because of location of shipwrecks and historic wharves, docks, and refuse disposal. The boundary chosen constitutes the lands altered and developed historically by the military units that have been stationed at the Presidio, or by specific allowed civilian or other agency activities approved through the military command.*[10]

The Presidio NHL is a district that encompasses "forested hills and winding roads" of a large military reservation that stands in sharp contrast to the nearby densely developed urban neighborhoods of San Francisco. In general, the district is made up of several areas of historic development, including the Main Post, the Letterman Hospital area, the San Francisco National Cemetery, Fort Winfield Scott, Crissy Field, Fort Point National Historic Site, and Fort Point U.S. Coast Guard Station. Since becoming a national park, the NPS and the Trust have organized the Presidio into park planning districts that are based on these historic areas.[11]

The Presidio NHLD has a high degree of visual unity that reinforces its historical importance and displays the continuity that the district had maintained throughout its long period of significance. The contributing elements of the district have historically been designed to respond to the topography of the site, including the curving alignments of Presidio roads and trails, the creation of the historic forest, and placement of buildings and structures. Various periods and styles of architecture are reflected in the contributing buildings, structures, objects, and sites of the Presidio NHLD, but generally speaking "… the architecture is unified by the military's basic and straightforward approach to construction and design. This approach generally tended toward formal symmetry and eschewed excessive ornamentation.

The 1993 NHL documentation prepared by the NPS identified the Presidio as a designed landscape, provided a description of its development, and listed some landscape characteristics as contributing features. However, this

9 The Trust is planning a comprehensive update to its NHL forms, which will integrate the Cold War-era supplement into the 1993 forms, along with any newly eligible resources, beginning in the fiscal year 2016.

10 NPS, "Presidio… Registration Forms," 10.

11 NPS, "Presidio… Registration Forms," 7-2 and 7-3.

documentation acknowledged that the 1993 update was "an initial effort to identify and explain contributing landscape features."[12] Other NPS studies focused on the cultural landscape of the Presidio, such as the 1992 Cultural Landscape Report – Phase One Priority Areas, and informed planning efforts for the General Management Plan Amendment (GMPA, 1994) and ultimately the PTMP. A Cultural Landscape Assessment was prepared in 2002 to augment and update the NPS information so that the architectural portion of the Presidio's cultural landscape would be more completely described and any potential effects could be more accurately determined.[13] Since 2002 additional cultural landscape studies were prepared for focused areas within the Presidio, the most germane to this FOE include the Main Post Cultural Landscape Report (2012), West of Main Parade: Focused Cultural Landscape Report (2011), Fill Site 6A Cultural Landscape Report (2005), Tennessee Hollow Cultural Landscape Report (Draft), and the Quartermaster Reach Cultural Landscape Analysis and Treatment Recommendations (2007). Treatment recommendations from the 2012 Main Post CLR have been incorporated into the draft supplemental guidelines attached to this document.[14]

2.1.1 INTEGRITY ASSESSMENT OF PRESIDIO OF SAN FRANCISCO NATIONAL HISTORIC LANDMARK DISTRICT AND AREA OF POTENTIAL EFFECT

The buildings, cultural landscape and archaeological features of the Presidio NHLD retain their integrity to varying degrees and reflect the actions of the militaries of three nations during the period of significance from 1776 to 1945. The Presidio retains integrity of location and setting; the park is today differentiated from the surrounding urban environment of San Francisco, overlooking the Bay and Golden Gate from a promontory of land selected by Spanish explorers in the 18th century.

In the built environment, the Presidio retains the essential hierarchies associated with a military post. These include the ceremonial relationships between built and open space, and an overall organization according to Army activities, such as barracks buildings fronting parade grounds. The historic forest planted by the Army beginning in the 1880s is under restoration and is being maintained, while landscaped areas have been rehabilitated in most residential neighborhoods and along primary circulation routes. Architecture throughout the

[12] NPS, "Presidio… Registration Forms," 7-16.

[13] It should be noted that the term "cultural landscape" has been used in this report since it is generally accepted to include all the various "types" of historic landscapes: historic sites, historic designed landscapes, historic vernacular landscapes, and ethnographic landscapes (Birnbaum and Peters 1996:4).

[14] In addition to the 2002 Cultural Landscape Assessment for the Main Post, the Presidio Trust has prepared CLA's for several other areas and districts within the NHLD, including Fort Scott, the Public Health Service Hospital District, Mountain Lake, Fill Site 6A, Quartermaster Reach, Tennessee Hollow, and the Cavalry Stables.

Presidio today reflects the changes in military design, materials and workmanship from the 1860s to the 1980s. Since 1994, approximately two-thirds of the contributing structures in the NHLD have been rehabilitated according to the Secretary's Standards for the Treatment of Historic Properties.[15] Because the Presidio no longer functions as an active military base, most of these rehabilitations have been adaptive reuse projects.[16] Areas of change since 1994 have been concentrated in Crissy Field and Letterman Hospital Complex and the Public Health Service Hospital district. The Doyle Drive/Presidio Parkway Corridor in general, and the project site in particular, have experienced high levels of change since the project began in 2008 due to demolition of contributing buildings and structures, and alterations to the cultural landscape.[17]

2.2 THE EVOLUTION OF THE PRESIDIO WITHIN THE AREA OF POTENTIAL EFFECT

The Area of Potential Effect (APE) is comprised of some of oldest areas of development within the Presidio with contributing resources that include roadways, landscapes and buildings in a range of styles, construction and use. The APE encompasses the Main Post and extends south and east to include the Crissy Field waterfront, the Halleck Street Corridor and the former Letterman Hospital Complex.

Historically, the area that is now Crissy Field consisted of an extensive tidal marsh at the base of the bluffs. A seasonal creek drained the plateau on which the Main Post now sits, flowing northeast into the marsh near where present-day building 603 now stands. This ecologically rich area provided bountiful resources for the Ohlone people of the area, who were called Yelamu in the northern peninsula.

With the arrival of the Spanish in 1776, the transformation of the area by non-native hands began, first with the establishment of the adobe fort in today's Main Post, and later by large-scale earth moving activities near the original fort and along the waterfront under the US Army. The earliest periods are legible in the Main Post's original rectilinear organizational structure of buildings organized around open spaces, beginning with a defensive quadrangle of buildings organized around a *plaza de armas*, or parade ground, established by the Spanish colonial party in 1776. The development of the Main Post after the American takeover in 1846 followed the original Spanish geometry and orientation toward the bay.

[15] All subsequent mention of the "Secretary's Standards" will refer to the Secretary's Standards for the Treatment of Historic Properties, unless otherwise noted.

[16] "Adaptive reuse" is the process of establishing a new program for a building while retaining its original form and historic features, and can be made to conform to Standard 1 of the Secretary of the Interior's Standards for Rehabilitation. Although criteria iv of the examples of adverse effects specifically mentions "use" adaptively reusing a building within the Secretary's Standards avoids an adverse effect determination.

[17] For a synopsis of how the project area has changed over time, refer to pages 9-20 of the attached supplemental guidelines.

The first significant and lasting extension of the colonial plaza under the American flag was the development of the Funston Avenue Officers' Quarters (buildings 4-16) and Civil War Barracks (buildings 86, 87 remain). By 1870, a roadway (the future Lincoln Boulevard) had traversed the northern end of the site, marking what would soon become the northern limit of the Main Parade. The Army populated the area between the road and the edge of the bluff with stables and other utilitarian structures.

Construction of the Montgomery Street barracks (Buildings 100-106) began in 1893. These 48,000 square foot structures were sited adjacent to a stream ravine that was filled to create a drill field known as the Main Parade and an expanded stables area to the north. The buildings included in this district primarily served residential (barracks and homes), community (chapels, entertainment, officers and enlisted clubs, gymnasiums), and administrative functions.

From the beginning of the American period (1846), when the wharf was moved to the east of the early Spanish-era anchorage, to the 1890s, the area between Lincoln Boulevard and the waterfront contained service buildings, stables, temporary structures and transportation/shipping infrastructure. In the first two decades of the 20th century, many of the densely built utilitarian buildings on the upper bluff (between Lincoln Boulevard and the bluff edge) were replaced by purpose-built, formalized structures with clear hierarchies (such as the guardhouse (210), fire station (218) and administration/training building (220)). During the same period, the land between the bluff edge and the waterfront continued to serve more ad-hoc, temporary functions, such as stables, part of the Panama Pacific fairgrounds, and barracks for soldiers preparing for World War I.

In the early twentieth century, the Army began filling the slough, enabling the relocation of the stables and other back-of-house functions from the upper bluff to the lower waterfront. Like the waterfront, the Halleck Street service corridor, which connected the bluff and the waterfront, had been considered a more integral part of the Main Post until the end of the nineteenth century. A rail line that aligned with the north end of Funston Avenue and the extension of Halleck Street to the Presidio pier served as a transition from the formal Main Post on top of the bluff to the more utilitarian service and transportation area below.

In 1898, east of the Halleck Street corridor, situated at the main entrance to the Presidio, the U.S. Army established the Letterman Hospital which provided medical services to soldiers for almost a century. The original hospital complex included hospital wards, clinics, offices, warehouses, and ancillary buildings and an orthogonal street layout create the district's distinct urban character. As the Letterman Hospital complex and its service district (centered on Thornburgh Road and Gorgas Avenue) developed, the east side of Halleck Street, along with Buildings 204 (demolished) and 201(partially demolished and relocated), became more aligned with these utilitarian areas, and less connected to the residential and administrative functions of the Main Post. This shift

completed the formalization of the Main Post's northern boundary as the west side of Halleck Street, sweeping around to the edge of the bluff north of Building 211 (built 1968).

The 1915 Panama Pacific International Exposition (PPIE) brought sweeping change to Crissy Field and the lands adjacent to the Letterman Hospital, constructing a vast, temporary "city" of exhibit halls, as well as a racetrack. Taking place on filled lands, the PPIE featured an open, axial layout of freestanding pavilions organized around the dome of the Palace of Fine Arts, the only landmark structure from the fair that still stands today. The onset of World War I cut the Exposition short, and its buildings were replaced with a large cantonment of barracks. Infrastructure, including a rail line along Mason Street and associated warehouses, connected the Presidio to Fort Mason and the Port of San Francisco during this time.

The U.S. Army constructed clusters of wood-frame warehouses along Gorgas Avenue and the side of Mason Street at the northeastern corner of the Presidio, between 1917 and 1919 when the Presidio was becoming a major supply depot. These warehouses were served by the same belt railway which entered the Presidio at the Marina Gate, then turned into the historic Letterman Hospital complex on Gorgas Avenue. The rail lines in Mason Street remained in service until 1979, when the U.S. Army ceased rail-based shipping operations through the Marina Gate.

In 1921, as part of the development of the Crissy Air Field, the Army constructed an airfield and support buildings, including hangars, housing and warehouses at the west end of Mason Street. However, this use was short-lived and Crissy Field closed as an active airfield in 1936 due to treacherous flying conditions and advances in military aviation. It was at this time that construction of Doyle Drive separated the waterfront from the Main Post, limiting the visual and physical connections between the ceremonial landscapes of the upper bluff and the light industrial functions of the waterfront. By 1941, the Mid-Crissy area largely consisted of motor pool, storage and warehouse buildings (including today's building 603), many of which remained until the 1980s.

The present-day organization of the Mid-Crissy area largely dates to 1989, when the remaining motor pool buildings were removed, and the Commissary (Building 610, now Sports Basement) and associated parking were constructed. Similarly, the northern Main Post current use as a transit hub, parking and services area largely dates to the late 1960s, when the booming civilian population working on-post necessitated dining options for non-service people, and transit infrastructure for commuters. The site of the former Letterman Hospital was redeveloped in the 1960s for the Letterman Army Medical Center and the Letterman Army Institute of Research. By 1980, about two-thirds of the original hospital complex had been demolished, and the courtyard had been turned into a parking lot.

With the transfer of the Presidio from the Army to the National Park Service and the Presidio Trust in the 1990's, contributing resources in the APE have benefitted from rehabilitation and adaptive re-use projects in efforts to

revitalize the former military base for public use. The combined efforts of the two agencies and their partners have led to the successful rehabilitation of hundreds of buildings, multiple landscapes, infrastructure systems and natural resources. These agencies have carefully adapted a former military post to accommodate the new needs and goals of this unique National Park.

In 2011, Caltrans demolished the Marina Viaduct and elevated on ramps to the south and west of the warehouses as part of the replacement of Doyle Drive with the new Presidio Parkway (anticipated completion in 2016). Additional losses of integrity associated with the removal of Doyle Drive include the demolition of contributing Building 204 (1896), the alteration or removal of contributing roadways including grade changes at Halleck Street, the widening and extension of Girard Road, and the removal Bank Street; and the partial deconstruction and move of contributing Building 201. The Presidio Parkway project also resulted in the demolition of several non-contributing resources including Buildings 231, 606 and 605, and the introduction of two new tunnels and reconstructed bluff-like landform, on which the majority of the project site sits.

Since 1994, approximately two-thirds of the historic buildings and structures in the Presidio have been rehabilitated and occupied, resulting in the successful re-use of former military buildings for housing, non-profit agencies, commercial offices, educational facilities and housing. Within the APE, such efforts include the rehabilitation of building 50, the Presidio's oldest building, along with rehabilitation of former barracks, World War I warehouses, Depression-era administrative buildings and ceremonial landscapes. Such work has helped to preserving resources while continuing the story of the Presidio. See chapter 3 for a list of cumulative projects considered under this evaluation.

2.2.1 INTEGRITY ASSESSMENT OF THE AREA OF POTENTIAL EFFECT

In order to arrive at an overall integrity statement for the APE, the seven criteria identified by the National Register for considering the integrity of a property are addressed in this document: location, design, setting, materials, workmanship, feeling, and association.

Looking at the APE from the perspective of the current moment, the integrity of the site for its total history varies, with the greatest integrity found in the Main Post, moderate integrity east of the Main Post at the site of the former Letterman Hospital, and lower integrity found along the waterfront at Crissy Field. The majority of the project site, however, has very low integrity, due to major alterations brought about by the Presidio Parkway project.

Integrity is assessed in "real time" or as the property exists now in relationship to its period of significance. However, each successive period of development in the growth of the Presidio through more than two centuries affected the integrity of the earlier periods.

After the Presidio transferred from the Army in 1994, projects have conformed to the Secretary of the Interior's Standards for the Treatment of Historic Properties, and have largely avoided diminishment of the landmark's integrity, with the exception of reconstruction of Doyle Drive, which adversely affected the NHLD. An overall integrity assessment for the APE, using the aspects of integrity, follows:[18]

Design, Materials, and Workmanship

The APE is a repository of the changing designs, the evolving methods of construction, and the craftsman's building arts for each period of the Presidio's development. While the majority of Spanish and Mexican period resources have been removed, the evidence of design, construction materials, and workmanship can be found in the orthogonal layout of the *plaza de armas*. Building materials favored by the military for their permanence and utilitarian character (such as wood, brick and concrete) have either been retained or carefully restored. Large parts of the 1899 Letterman Hospital complex were removed by the U.S. Army in the 1960s-70s, in addition to cantonments of World War II temporary-type and waterfront industrial buildings in the 1980s-2000s. Despite the removals, taken as a whole, the integrity of the APE in exhibiting its entire period of significance is high.

The integrity of the APE's design as an Army post remains intact even though individual structures or landscape elements have been changed or removed. Established by the location, layout, and orientation of El Presidio, the Main Post site plan still conveys the development of the Presidio through the period of significance. The overall design of the Main Post reflects military planning. It aligns along an axis that has the former headquarters building (now the rehabilitated Officers' Club) at the head, support structures at the foot, and each side flanked by housing and barracks. The spatial relationship between open spaces and buildings remains largely intact as does the grid of streets that connect these elements. The expansion of the Main Post under the American flag resulted in a mix of formal spaces and utilitarian needs along the northern waterfront, within the Crissy Field, Letterman Hospital Complex and in the Halleck Street corridor. Though uses changed in buildings throughout the period of significance and to the present day, the original building use is reflected in the standard military architecture.

The integrity of workmanship remains high within the APE with many original buildings, construction details, and materials intact. The removal of certain defining landscape features, structures and buildings since 1994, particularly the reconstruction of Doyle Drive and removal of some buildings, have diminished the level of workmanship within the APE. However, the removal of features with poor design and materials, such as the paving at both Crissy Field and the Main Parade, and the incompatible Letterman Army Hospital Center, have improved the overall levels of workmanship within the APE. Furthermore, as a rule, replacement features

[18] National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation (1995), p. 44.

including the new Presidio Parkway, new Main Parade Ground and rehabilitated Crissy Field were carefully designed to complement, not detract, from the overall National Historic Landmark District. Therefore, with the retention of original buildings and landscapes and thoughtful rehabilitation of insensitive features within the APE, the resulting workmanship of the area exhibits greater cohesion of the defining features within the Presidio.

Location and Setting

The integrity of the location of the APE is high. The military of *Nueva España* or New Spain settled at the entrance of the Golden Gate for defense purposes. Under the American Flag, this strategically important military outpost expanded development from the Main Post, establishing rail lines, a light-industrial sector, an airfield and a hospital district. Though this early settlement has greatly expanded from its beginnings as a Spanish outpost, the APE retains its important location overlooking the Golden Gate and the San Francisco Bay. The Presidio remained the command center for the U.S. Army in the Pacific for much the same reason. Though San Francisco has grown up around the Presidio, it remains distinct from the city; the strategic location of the post within the APE can still be discerned whether looking from the Presidio to the Bay or from the Bay to the Presidio.

During the Period of Significance, the U.S. Army modified the setting of the APE by planting trees, leveling hills and filling streambeds and sloughs. More recently, the replacement of Doyle Drive has and will alter some relationships, particularly the removal of the bluff face between Main Post and Crissy Field, the alteration of some roadways, and the demolition of contributing structures. However, since the base closed, essential features such as topography, the historic forest, landscaped areas, water systems and native plant communities remain or have been enhanced, tying together the many disparate building programs, and in many ways sustaining the overall integrity of the APE's location and setting.

Feeling and Association

The integrity of the feeling of the Main Post as a military post and its association as the site of a long and important military history are high as well, although many of the changes that occurred towards the end and after the period of significance, especially the paving of the Main Parade Ground (later partially rehabilitated in 2011), the paving of Crissy Field, and the demolition of buildings, have obscured some of the Presidio's features. In large part, the buildings and landscapes of the APE retain the character of their origins as a powerful hub of military activity.

Although the Army's departure in 1994 reduced the level of activity at the Presidio, the APE historically was a bustling area, with residential, recreational and administrative activities at all hours. Its collection of military structures, representing different styles from the Civil War to the Cold War, convey to an observer a connection with the Army command that presided over the Spanish American War and two world wars, and with the soldiers

that supported these efforts. While little remains to allow an observer to connect with the Spanish and Mexican history at the Presidio, the archaeological remains of El Presidio are largely intact; building patterns and the street alignments have also remained relatively intact throughout the period of significance and can be interpreted for the visitor to help describe the history of the post.

Based on this analysis and the National Register Bulletin's guidance, the Presidio at the time of transfer in 1994 "retain[s its] integrity as a whole, [since] the majority of the components that make up the district's historic character…possess integrity." However, within the much smaller project site, the level of integrity is quite low due to the removal of historic resources and alterations to the cultural landscape.

Archaeological Resources

The archaeological resources of the Presidio are not readily observable. Therefore, Trust archaeology staff and their consultants performed a series of investigations between January and December 2008 to characterize some of the predicted features identified in the 1993 NHL Update to better inform the decision-making process. This effort included a review of the information contained in the 1993 Update and 2008 NHL Update, new archival research, geographic information system (GIS) analysis, and geo-archaeological assessments of Presidio soils and sediments.

With a few minor exceptions, the identification of resources provided in the 1993 Update, and refined by the 2008 Update and subsequent research has proved to be reliable and very useful for both planning and preservation. Some of the contributing features are still "predicted" while others have since been verified. Because contributing status for these features has previously been established – and due to the reliability of the predictions – the Trust assumes that, unless contrary data exists, the features identified by the NPS in 1993 retain integrity (Figure D). Relying on this assumption is preferable to destructive testing to evaluate their integrity.

General research into the history and development of the Presidio - and especially the Main Post - has been ongoing since 1993, and will continue. The Presidio Parkway project conducted some limited identification efforts within their construction area, which helped to refine the boundaries of the Quartermaster Dump site and characterize potential prehistoric deposits. No prehistoric deposits have been encountered during the freeway work to date; the southern portions of the Quartermaster Dump site will be covered by fill during the Presidio Parkway's reconstruction of the Main Post bluff landscape feature.

2.3 HISTORIC PROPERTIES IN THE AREA OF POTENTIAL EFFECTS

All identified contributing resources in the APE (Figure C), including buildings identified by number and period of construction are listed below. They are listed by: 1. Contributing resources with no potential to be affected by the undertaking (250 resources), 2. Resources with the potential to be directly affected by the undertaking (one

building and three archaeological sites), and 3. Resources with the potential to be indirectly affected by the undertaking (19 buildings, Main Parade and one road). These are identified in Tables 2.3.1, 2.3.2, and 2.3.3. There are also 26 non-contributing buildings or structures in the APE, listed in Table 2.3.4.

The contributing resources are listed as described in the 1993 National Historic Landmark Registration Form and 2008 Update. The narrative descriptions follow in the sections of text below describes the buildings with the potential to be directly and indirectly affected. The descriptions were taken directly from the 1993 NHL Update; with modifications made to reflect current conditions.

2.3.1 LIST OF CONTRIBUTING RESOURCES IN THE APE WITH NO POTENTIAL TO BE AFFECTED (BUILDINGS ARE LISTED BY NUMBER AND STRUCTURE NAME, WITH DATE OF CONSTRUCTION NOTED)

Number, Structure or Archaeological Feature Name (Date)

2 – Post Hospital (1864)
3 – Temporary Barracks (1942)
4 – Officer Quarters (1879)
5 – Officer Quarters (1862)
6 – Officer Quarters (1862)
7 – Officer Quarters (1862)
8 – Officer Quarters (1862)
9 – Officer Quarters (1862)
10 – Officers' Family Housing (1862)
11 – Officers' Family Housing (1862)
12 – Officers' Family Housing (1862)
13 – Officers' Family Housing (1862)
14 – Officers' Family Housing (1862)
15 – Officers' Family Housing (1862)
16 – Officers' Family Housing (1862)
35 – Enlisted Men's Barracks and Mess Hall (1912)
37 – Administration Building (1941)
38 – Enlisted Men's Barracks and Mess Hall (1940)
39 – Enlisted Men's Barracks and Mess Hall (1940)
40 – Bachelor Officer Quarters (1941)
41 – Bachelor Officer Quarters (1941)
42 – Pershing Hall, Bachelor Officer Quarters (1904)
44 – Garage (1940)
45 – Chapel of Our Lady (1964)
47 - Garage (1940)
48 - Garage (1940)
49 – Officer Family Housing (1882)
50 – Officers' Club (c1776-1847)
51 – Officer Quarters (1889)
53 – Water Pressure Reducing Station (1910)
56 – Officer Quarters (1885)
57 – Officer Quarters (1885)
58 – Officer Quarters (1885)
59 – Officer Quarters (1885)
64 – Officer Quarters (1889)
65 – Officer Quarters (1893)
67 – Main Telephone Exchange (1919)
68 – Emergency Generator (1955)
95 – Magazine (1863)
96 – Tennis court west of Arguello (1936)
97 – Red Cross Building (1942)
99 – WPA Theater (1939)
107 – Switching Station (1911)
108 – Storage Building, Electricians Shop (1940)
113 – Garage (1940)

116 – Post Trader, Post Exchange, Quarters, Administration/Office (1885)
118 – Garage (1940)
122 – Gymnasium (1904)
123 – Garage (1930)
124 – Enlisted Family Quarters (1909)
125 – Enlisted Family Quarters (1909)
126 – Enlisted Family Quarters (1909)
127 – Enlisted Family Quarters (1931)
128 – Enlisted Family Quarters (1931)
129 – Enlisted Family Quarters (1931)
130 – Chapel (1932)
135 – NCO Club (1949)
222 – Warehouse (1910)
224 – Flammable Storage (1940)
225 - Storehouse (1910)
325 – 30th Infantry Officer Quarters (c1910)
326 – 30th Infantry Officer Quarters (c1910)
327 – 30th Infantry Officer Quarters (c1910)
328 – 30th Infantry Officer Quarters (c1910)
329 – 30th Infantry Officer Quarters (c1910)
330 – 30th Infantry Officer Quarters (c1910)
331 – 30th Infantry Officer Quarters (c1910)
332 – 30th Infantry Officer Quarters (c1910)
333 – 30th Infantry Officer Quarters (c1910)
334 – 30th Infantry Officer Quarters (c1910)
335 – 30th Infantry Officer Quarters (c1910)
336 – 30th Infantry Officer Quarters (c1910)
337 – 30th Infantry Officer Quarters (c1910)
338 – 30th Infantry Officer Quarters (c1910)
339 – 30th Infantry Officer Quarters (c1910)
340 – 30th Infantry Officer Quarters (c1910)
341 – 30th Infantry Officer Quarters (c1910)
342 – 30th Infantry Officer Quarters (c1910)
343 – 30th Infantry Officer Quarters (c1910)
344 – 30th Infantry Officer Quarters (c1910)
344 – 30th Infantry Officer Quarters (c1910)
345 – 30th Infantry Officer Quarters (c1910)
375 - Garage (1939)
376 - Garage (1939)
377 - Garage (1939)
378 - Garage (1939)
379 - Garage (1939
380 - Garage (1939)
381 - Garage (1939)
382 - Garage (1939)
383 – Garage (1939)
384 – Tennis courts inside Infantry Terrace loop (1939)
385 – Post Exchange (1955)
386 – Post Library (1958)
558 – Post Exchange and Restaurant (1920)
559 – Comfort Station (1940)
603 – Commissary (Photo Lab) (1939)
631 – Ammunition Magazines (1935)
632 – Ammunition Magazines (1935)
635 – Battery Blaney [structure] (1901)
636 – Battery Sherwood [structure] (1900)
640 – Hangar, Warehouse (1928)
641 – Latrine, Office (1928)
643 – Aircraft Hangar (1923)
644 – Unit Motor Pool (1951)
645 – Sewage Pump House (1949)
649 – U.S. Army Reserve Center (1951)
650 – Stilwell Hall: Enlisted Barracks with Mess (1921)
654 – Guard House (1921)
661 – Stables for 102 Animals (1913)
662 – Stables for 102 Animals (1914)
663 – Stables for 102 Animals (1914)
667 – Stables for 102 Animals (1914)
668 – Stables for Veterinary Hospital (1914)
669 – Animal Crematory/Post Incinerator (1936)
671 – Storage (1939)
680 – Electrical Substation (1908)
681 – Barracks (1923)

682 – Enlisted Barracks and Mess (1902)
683 – Day Room (1923)
920 – Motor Repair Shop (1921)
922 – Transformer Vault (structure) (1921)
923 – Transformer Vault (structure) (1921)
924 – Engineer Field Maintenance (1958)
926 – Hangar (1921)
927 – Transformer Vault (structure) (1921)
929 – Gas Pump House (1921)
931 – Armorer's Building (1921)
933 – Dope Shop and Boiler Houses (1921)
934 – Motor Test Building (1921)
935 – Aero Storehouse (1921)
936 – Transformer Vault (structure) (1921)
937 – Hangar (1921)
945 – Grease Rack (structure) (1921)
1000 – Officers' Quarters (1902)
1001 – Officers' Quarters (1902)
1002 – Officers' Quarters (1908)
1003 – Officers' Quarters (1908)
1004 – Officers' Quarters (1908)
1007 – Barracks (1901)
1008 – Ward, 76 Beds (1931)
1009 – Ward, 80 Beds (1930)
1012 – Ward, 76 Beds (1931)
1013 – Ward, 22 Beds, Receiving Office (1933)
1014 – Outpatient Clinic (1924)
1016 – Administration Building (1899)
1040 – Power House (1900)
1047 – Laundry (1914)
1050 – Ward, 80 Beds (1918)
1051 – Detention Ward (1909)
1056 – Animal House (1910)
1059 – Storage For Combustibles (1915)
1060 – Medical Surgical Warehouse (1916)
1061 – Acid Storage (1938)
1062 – Quartermaster Shops (1922)
1063 – Medical Supply Warehouse (1941)
1076 – Letterman Complex Ambulance Garage (1938)
1151 – Indoor Swimming Pool (1945)
1152 – Gymnasium (1945)
1160 – Warehouse (1940)
1161 – Warehouse (1919)
1162 – Warehouse (1919)
1163 – Warehouse (1919)
1167 – Warehouse (1919)
1169 – Warehouse (1919)
1170 – Warehouse (1919)
1182 – Warehouse (1917)
1183 – Warehouse (1917)
1184 – Warehouse (1919)
1185 – Warehouse (1917)
1186 – Warehouse (1919)
1187 – Warehouse (1919)
1188 – Warehouse (1919)
1901 – Officer-in-charge quarters, USCG (1890)
1902 – Boathouse, USCG (1890)
1903 – Boathouse and quarters (1919)
1907 – Shop/garage, USCG (1940)
Battery Baldwin (1903)
Battery Slaughter (1900)
Quartermaster Complex (Archaeological Site)
Quartermaster's Dump (Archaeological Site)
Stream Ravine Dump Area (Archaeological Site)
El Presidio de San Francisco (Archaeological Site)
Spanish Cemetery (Archaeological Site)
Old Post Cemetery (Archaeological Site)
Civil War Barracks, Kitchens & Shops (Archaeo. Site)
Funston Avenue Officer's Quarters (Archaeo. Site)
Post Hospital and Meteorological Stn. (Archaeo. Site)
Non-Commissioned Staff Quarters (Archaeo. Site)
Laundresses and Enlisted Men's Quarters (Archaeological Site)
Sultry (Archaeological Site)

Stream Ravine Dump Area (Archaeological Site)
Quartermaster Complex (Archaeological Site)
Main Post Water Control (Archaeological Site)
Laundress' Quarters (Archaeological Site)
Battery Baldwin, Slaughter, Sherwood and Blaney (Archaeological Site)
Quartermaster Dump (Archaeological Site)
Ohlone Shellmound (Archaeological Site)
Anza Street (1864)
Arguello Boulevard (1883)
Barnard Avenue (1880)
Battery Blaney Road (1900)
Bliss Road (1941)
Clark Street (1932)
Cowles Street (1912)
Crissy Field Avenue (1920)
Deems Road (1942)
Edie Road (1902)
Fisher Loop (1912)
Funston Avenue (1862)
General Kennedy Avenue (1902)
Gibbon Court (1942)
Girard Road (1902)
Gorgas Avenue (1920)
Graham Street (1846)
Halleck Street (1885)
Hamilton Street (1941)
Hoffman Street (1920)
Incinerator Road (1912)
Infantry Terrace (1909)
Kendall Street (1941)
Keyes Avenue (1940)
Lincoln Boulevard (1870)
Livingston Street (1941)
Lombard Street (1880)
MacArthur Avenue (1902)
Martinez Street (1941)
Mesa Street (1862)
Mauldin Street (1941)
McDonald Street (1941)
McDowell Avenue (1912)
Montgomery Street (1880)
Moraga Avenue (1846)
Old Mason Street (1920)
Ord Street (1912)
O'Reilly Avenue (1912)
Park Boulevard (1870)
Patten Road (1912)
Pearce Street (1941)
Pena Street (1940)
Pennington Street (1941)
Presidio Boulevard (1862)
Richardson Avenue (c1937)
Riley Avenue (1912)
Rodrigues Street (1902)
Schofield Road (1920)
Sheridan Avenue (1920)
Sibley Road (1932)
Taylor Road (1895)
Thomas Avenue (1909)
Thornburg (1912)
Torney Avenue (1912)
West Broadway (1912)
West Halleck (1880)
West Pacific Avenue (1900)
F22 – Main Post Water Control (1866-1890)
A:6 – Old Post Cemetery (1846-1890)

2.3.2 LIST OF CONTRIBUTING RESOURCES WITHIN THE APE WITH THE POTENTIAL TO BE DIRECTLY AFFECTED (LISTED BY NUMBER AND STRUCTURE NAME, WITH DATE OF CONSTRUCTION NOTED)

Number, Structure or Archaeological Feature Name (Date)

603 – Commissary (Photo Lab) (1939)
Quartermaster Complex (Archaeological Site)
Quartermaster's Dump (Archaeological Site)
Stream Ravine Dump Area (Archaeological Site)

2.3.3 CONTRIBUTING RESOURCES WITHIN THE APE WITH THE POTENTIAL TO BE INDIRECTLY AFFECTED (LISTED BY NUMBER AND STRUCTURE NAME, WITH DATE OF CONSTRUCTION NOTED)

Number, Structure or Archaeological Feature Name (Date)

36 – Artillery Barracks/Military Police Offices (1885)
86 - Barracks (1862)
87 – Barracks (1862)
94 – Main Parade Ground (1893)
100 – Enlisted Barracks (1909)
101 – Enlisted Barracks (1895)
102 - Enlisted Barracks (1896)
103 – Enlisted Barracks (1896)
104 – Enlisted Barracks (1897)
105 – Enlisted Barracks (1897)
106 – Band Barracks (1909)
201 – Exchange Store (1896)
210 – Guard House (1900)
218 – Fire Station (1917)
220 – Baker's & Cook's School and Barracks (1939)
223 – Warehouse (1897)
227 - Warehouse (1897)
228 - Bakery (1909)
229 - Bakery (1897)
Halleck Street (1885)

2.3.4 NON-CONTRIBUTING BUILDINGS WITHIN THE APE (LISTED BY NUMBER AND STRUCTURE NAME, WITH DATE OF CONSTRUCTION NOTED)

Number, Structure Name (Date)

30 Transformer [structure] (1958)
62 Transformer [structure] (1971)
63 Concrete gymnasium (1971)
70 Electric substation (1970)
93 Bowling alley (1989)
114 Transformer [structure] (1959)
119 Storage shed (c1970s)
120 Storage shed (c1970s)
211 Cafeteria [Burger King] (1968)
215 Transit Center (2005)

387	Child care center (1988)
610	Commissary (1989)
653	Refrigeration warehouse (1965)
666	Dog kennels [structure] (1965)
684	Transformer vault [structure] (c1980s)
925	Transformer enclosure [structure] (1959)
1027	Garage and storage (c1980s)
1028	Women's barracks (1976)
1029	Medical barracks (1929)
1089	Cooling tank [structure] (1965
1199	Crissy Field Center (Area A) (2009)
1909	Storage, USCG (Area A)(c1960)
1916	Entrance Gate, USCG [structure; not counted] (Area A)(c1950)
1914	Picket Fence, USCG [structure; not counted] (Area A)(c1950)
N/A	East Beach/Crissy Field Bathroom (Area A) (c1999)
N/A	1 Letterman Dr. Lucas Digital Arts Center (2005)

2.3.5 CONTRIBUTING RESOURCES IN THE APE WITH THE POTENTIAL TO BE DIRECTLY AFFECTED

603 Commissary and Photo Lab (1939)

Erected with Works Progress Administration (WPA) funds in 1939 for $61,400 as a commissary and warehouse. In the 1947, this two story building was converted into a photographic laboratory and audiovisual center which led to substantial interior alterations. A 70-seat auditorium was installed in 1966. In 1999, the Conservancy rehabilitated the building as their new Crissy Field Center. The rehabilitation of the building led to the removal and replacement of the added structure on the north side loading dock and the creation of a second story deck atop of the new structure. The 2001 scope of work also included a new interior stair connecting the first and second floors at the north side of the building, new partitions, new finishes throughout, new bathroom and elevator core in the southeast corner of the building, and the enlargement of several windows to accommodate new doors.

The building measures roughly 60' x 105' in plan and is of concrete-block construction. The gable roof is covered in mission tile. In materials and form, this simple, utilitarian building is harmonious with the "Spanish Colonial Revival," prevalent in Post architecture since 1910. It represents one of the many works-relief projects that significantly expanded the Presidio during the 1930s through the year 1940.

Quartermaster Complex – Archaeological Feature F21 (1866-1910)

The Quartermaster Complex archaeological area is predicted based on historic maps and historical documentary evidence. The complex was located at the north end of the Main Post and consisted of a series of buildings and structures such as stables, a bakery, blacksmiths, shops, and storehouses. A total of 21 buildings and structures were part of the complex. Most of the buildings were removed prior to 1915 but a few remained in use through World War I. The footprint of the Quartermaster Complex lies under Buildings 210, 218, 220, 211 and 215 and a

series of parking lots. Archaeological remains associated with the Quartermaster Complex could be expected to include privies, trash pits, dumps or sheet refuse deposits, stone or brick foundations from former buildings, and features associated with an open work space or yard.

Quartermaster Dump – Archaeological Feature A18 (1866-1890)

The Quartermaster's Dump archaeological area is known to contain archaeological deposits based on previous archaeological investigations. The area consists of a series of landfills dispersed over acres of the bayfront landscape of the Presidio. The Quartermaster Dump was a late 19th century garbage dump where refuse from the post was deposited into the bayshore marsh. Previously, trash disposal on the post had occurred close to the site of its production in privies. Beginning in the 1890s, garbage disposal at the Presidio began to occur in a more consolidated fashion into the communal dump maintained by the Quartermaster Corps. Discrete dumping in the marshlands had occurred earlier and may be represented at the basal layers of the site. By the turn of the 20th century, a garbage cremator was located near the Quartermaster Dump, along Halleck Street along the Presidio Wharf. Combustible garbage was burned while noncombustible materials such as tin cans, stable waste and ashes were disposed of in the marsh. The Quartermaster Dump archaeological deposits were eventually capped by additional fill brought in for the 1915 Panama Pacific International Exposition.

Stream Ravine Dump Area – Archaeological Feature F20 (1866-1910)

The Stream Ravine Dump archaeological area is predicted based on the presence of a stream ravine that bisected the current Main Parade. Given trash disposal practices of the 19th century, it is likely that trash was deposited in the stream ravine to be washed away, thus preventing trash buildup on the post. Additionally, the Stream Ravine Dump area would have been an attractive and convenient location for domestic work such as washing clothes and preparing food. The location of the Stream Ravine Dump area is predicted from historic maps that depict the course of the stream ravine before it was filled by the Army in 1893. The stream was likely used throughout the life of the fort by the Spanish, Mexican and American occupants until it was filled in 1893.

2.5.6 POTENTIALLY ELIGIBLE ARCHAEOLOGICAL RESOURCES IN THE APE WITH THE POTENTIAL TO BE DIRECTLY AFFECTED (PREHISTORIC ARCHAEOLOGICAL RESOURCES)

The Presidio of San Francisco is within the traditional territory of the Ohlone, a Penutian-speaking group that anthropologist hypothesize migrated into the San Francisco Bay region from the Central Valley. The exact timing of this migration is not known, but estimates range from around 1000 B.C. to 500 A.D. (Levy 1978). Two archaeological sites, CA-SFR-6/26 and CA-SFR-126, have been identified within the project area. It is thought that CA-SFR-129 (ca. 1300-1780s A.D.) may represent the ethnohistorically-known village of Petlenuc, which is associated with the Yelamu local tribe that inhabited the northern end of the San Francisco peninsula at Spanish arrival (Milliken 1995). CA-SFR-6 appears to be an earlier phase of Native Californian occupation (ca. 750 - 1350 A.D.) located very close to CA-SFR-129 and also on the bayshore estuary. The lower bluff of the project site is within an area that has been designated sensitive for precontact archaeological deposits, given the proximity to CA-SFR-6/26 and CA-SFR-129 and a similar bayshore environment. The tops of any archaeological deposits are predicted to be covered by substantial historic fill that was placed either as trash or as hydraulic fill in preparation for the Panama Pacific Exposition (PPIE) in 1915.

2.5.7 CONTRIBUTING RESOURCES IN THE APE WITH THE POTENTIAL TO BE INDIRECTLY AFFECTED

36 Artillery Barracks/Military Police Offices (1885)

Capt. Charles F. Humphrey, a locally-stationed quartermaster officer, designed this building as one of a pair of identical barracks (its companion was later demolished). The barracks was built in 1885 at a cost of $3,892, and assigned to an artillery company. (Light battery gun sheds, no longer extant, stood just to the north.) Its first floor originally contained offices, a recreation room, a kitchen, and mess room, while the open plan of the second floor housed a company of men. A small wooden shed-type addition was made to the rear in 1900, and electric lights were installed in 1912 when the building served as an administration building. Around 1940, the original two-level veranda was enclosed, the wood sill and brick pier foundation was replaced with concrete piers, and modern fixtures were introduced; interior alterations provided additional office space and a steam heating system.

The building has a two-story wood-frame structure. Its form, measuring roughly 58' x 96' in plan, consists of a basic cross-axial rectangular block with a cross-axial gable roof; an axial central element bisects the block and is marked by the gable end of its axial gable roof. This basic symmetrical format appears commonly in American residential architecture during the second half of the nineteenth century and through the early twentieth century. The windows and doors of the building are decoratively topped by hoods formed of standard classical moldings. A frieze-like element below the eaves, composed of vertical boarding, is a salient ornamental feature and relates to the decorative effects of the "Victorian"-era styles, particularly the "Stick Style" (similar decorative vertical boarding appears on Nos. 56-59 and No. 116, all constructed in 1885-86). Other architectural features include

oeil-de-boeuf elements centered in the four gable ends (some of the oeil-de-boeuf elements are "blind" while some contain vents) and brick chimneys with corbeled caps. A large monitored vent rises from the roof peak above the east side of building. Such vents are particularly characteristic of barracks of the 1870s and 1880s when the conventional wisdom of military medicine was that it was dangerous to breath air exhaled by others; this emphasis on ventilation was sometimes obsessive, leading to poorly heated and drafty barracks. The design of the building, relative to American architectural trends in the 1880s, exhibits a conservative adherence to symmetry and a restrained use of ornamental elements. The building stands as the only remaining example of this period's billeting for enlisted men.

86 Barracks (1862)

When built in 1862, this two-story building was only one-story and fronted on the main parade ground. Originally a barracks, it later served as a wagon shop. In 1885, funds were allocated to add a second story to convert the facility again into a barracks. This was accomplished either by removing the original roof and adding a new story or by jacking up the basic structure and constructing a new story beneath it. In either case, the original appearance of the fenestration, the front veranda, and the gable roof, with raking cornice and returns characteristic of mid-nineteenth-century architecture, was retained. The same treatment was undertaken on an adjacent and identical building (No. 87; see description directly below). In 1912, electric lights were installed, and the second-story of the front gallery, or veranda, was enclosed with wood siding and glazing to provide office space. At a point probably in the 1950s, a small one-story gabled building, dating perhaps to the 1940s (No. 85), appears to have been moved to the small space between this building and its adjacent twin (No. 87). Buildings 86 and 87 are now connected by a non-historic elevator core/lobby, which replaced the non-contributing Building 85. A small one- story addition of wood construction has been added to the rear, or southeast elevation, and appears to date to the 1950s or 1960s. The building measures 50' x 120' in plan and has a full-front veranda and gable roof. It exhibits narrow clapboard siding and simple architrave moldings and fascia boards. Architecturally, the building is a basic, utilitarian construction with few decorative elements.

87 Barracks and Mess Hall (1862)

Apart from its use as a quartermaster and as a commissary, the history of this building, including its 1885 remodeling, is the same as that of No. 86, above. The present form and appearance of the building are similar as well.

94 Main Parade Ground [site] (1893)

The Main Parade Ground is bounded by Sheridan Avenue, Montgomery Street, Lincoln Boulevard and Anza Street. Construction of the ceremonial space occurred 1893 at the location of a filled-in creek and west of the

earlier main parade ground, which had been established during the Civil War period. The 1895- 1897 erection of five identical brick barracks (Nos. 101-105) provided an imposing "streetscape" along the new parade ground's west border. At the eastern edge stood a group of nineteenth century buildings; today only buildings 86, 87 and 95 remain. In the 1950's, to meet a growing demand for parking, the Army paved the Main Parade. The Main Parade Ground was partially rehabilitated in 2011 with the removal of 2/3 of the asphalt and subsequent "greening" of the landscape.

101 – 105 Enlisted Barracks (1895-97)

Five barracks (including Building 101) were built in 1895-1897, at costs ranging from $36,000 to $54,700; they fronted on the then newly created parade ground and first established its northwest edge. The buildings' high cost was attributed to "unscrupulous" union labor and first-class plumbing fixtures (which no longer exist). The interiors were altered in 1972, and the buildings were formerly used as offices and enlisted men's barracks. Each building, which is roughly "U"-shaped in plan, measures 63' × 65' at center, with two 43' × 114' wings. The barracks are two-and-one-half stories plus a prominent basement-level. Walls are red brick, common bond; the basement level displays rock-faced random-course ashlar. Single-story front verandas have hip roofs, chamfered rectangular posts with splayed capital-like elements, and simple ball-and-pipe railings.

106 Band Barracks (1909)

This building was constructed as a 37-man military band barracks in 1909 at a cost $17,700. During the 1920s and 1930s, the Regimental Band of the 30th Infantry, "San Francisco's Own," occupied the building. It is used currently as offices. The two-story-plus-basement building has an H-shaped plan, measuring roughly 47' x 76', and a concrete foundation and red brick common-bond walls with a beltcourse flush with the wall plane consisting of stretchers laid end-up. A two-tier front veranda stands between the two symmetrical projecting end wings; the top level is now enclosed. The veranda has Tuscan columns supporting an abbreviated architrave and frieze-like fascia. The gable roof is now clad in asphalt shingles. Four brick chimneys, with corbeled caps, are located at center of each of four projecting gable ends. An oeil-de-boeuf motif is articulated by a raised circular course of headers, located in the pediment-like front gable ends of the two flanking wings. The main doorway is a segmental arch and has a transom and a paneled and glazed wood door. Window openings are segmental arches with concrete and stone lug sills. The windows are squared within the segmental arches and have double-hung sash, two-over-two. A wooden shed addition with shiplap siding is located at the rear of the building. Traditionally, military barracks for bands were superior to those for regular troops, and this building, as compared to the row of barracks (Nos. 101- 105), exemplifies this tradition architecturally in its fine "Colonial Revival" design. In both massing and detailing this design relates directly to stately Georgian prototypes in United States

architecture. The design for this building was a standard one issued by the central Office of the Quartermaster General (OQMG).

201 Exchange Store (1889)

Built in 1896 at a cost of $18,600 as a Post Exchange store, the building has undergone alterations, partial demolition and relocation. Prior to the reconstruction of Doyle Drive, this was a utilitarian one- and two-story building, measuring roughly 32' x 190', of wood-frame construction with lapped wood siding covered by insulation and plastic sheathing. It had rest on a rough-cut stone and concrete pier foundation until 2013 when the lower story was demolished and the upper story temporarily moved to the top of the bluff just north of French Court. A recessed loading bay was once located on the west elevation along with a loading dock on the east elevation; both elements were removed with the partial demolition and temporary relocation of the building. Extant is a hip roof has red asphalt shingles, and the eaves have small "S"-curved exposed rafter ends. Flush doorways have plain surrounds and solid wood doors and modern aluminum and glass doors. Windows are double- hung sash, twelve-over-twelve, with plain wood surrounds and wooden lug sills. Some windows have modern aluminum sash, both fixed and hinged. The Presidio Parkway project will relocate building 201 to Halleck Street, just south of its original site, on a new foundation and then rehabilitate the structure to accommodate a new use.

210 Guard House (1900)

This building was constructed as a guardhouse in 1900 at a cost of $18,700, and closes the north end of the 1890s parade ground (No. 94). The building has one-and-one-half stories and measures 59' x 84' in plan. Its foundation is random-course rock-faced sandstone; walls are red brick stretcher bond, and the dominant hip roof is now covered with red asphalt shingles. Octagonal dormers have double windows of a casement type and low overhanging and heavy-looking hip roofs. Eaves are treated with decoratively exposed rafters or joist ends. Original doors have been replaced with a modern industrial door type of aluminum and glass. Arched window openings are formed of three radiating header courses and have rock- faced stone lug sills and iron bars. Windows have double-hung two-over-two sash. Architecturally, the building is conservative, exhibiting basic and conventional design elements of the period, such as the dominant over-hanging hip roof and the two-over-two window sash.

Alterations in the 1950’s included the infill of some of the original window openings with brick, the addition of a clapboard-sided shed addition on the north elevation, the removal of the original open porch attached to the south side, the addition of a new concrete stoop with tubular metal railings leading to a new doorway in the east facade, and changes to the interior, which originally contained offices and cells. In 2001, the Presidio Trust rehabilitated the building for the Post Office and a bank, restoring some of the key features of the historic

building such as the reconstruction of the front porch and historic central entrance and modification of the ramp and entry of the eastern elevation near Lincoln Boulevard. The Trust will rehabilitate building 210 as the new Presidio Visitor Center in 2016 under a separate action.

218 Fire Station (1917)

The Fire Station was built in 1917 at a cost of $7,600 (part of the building may date from earlier than 1917). Shed additions have been made to the north and west elevations. Other modifications include the modernization of fixtures and substitution of original windows with standardized aluminum and glass units. Two-story, with a tall dominant hose tower, the building measures roughly 41' x 101' in plan and is of wood-frame construction with stucco, shiplap, and narrow clapboard siding and concrete foundations. The main portion has a hip roof, now covered with red asphalt shingles, and a cornice and frieze-like area below demarcated by horizontal molding running nearly 1' below the eaves. Doorways are flush with sliding overhead and wood-panel doors; fixed and hinged windows have wooden lug sills. The interior still features the brass pole down which crews slide from the second-story dormitory to the main floor. Utilitarian in design, the Fire Station shows conservative and simplified building elements of the period. The dominant hose tower is of note and derives from the campanile form. This station, built as a result of the tragic Pershing fire of 1915, was one of the first Army stations equipped with automotive fire engines, and remains today as the only World War I-era building standing in the immediate area of the Main Post. While remodeled to keep pace with changing firefighting technology, the station's continued use for its original purpose over seventy years is unprecedented at other posts around the country. The Trust expanded the Fire Station in 2003 to accommodate a new engine garage and living quarters.

220 Baker's & Cook's School and Barracks (1939)

Erected in 1939 for $183,400 through Works Progress Administration (WPA) funds as a school and barracks for cooks and bakers, the building is used currently for office space. The three-story reinforced-concrete building measures roughly 46' x 94' in plan, with a 51' x 74' wing to the south and a 34' x 74' wing to the north; forming an impressive `U'-shape plan configuration overall. It has low hip roofs clad in mission tile with solid copper or copper-clad dormer vents. Windows have standard six-over-six double-hung sash, fairly standard for the period. In form and materials, the simple and dignified design of this large building is harmonious with the fine "Spanish Colonial Revival" tradition, prevalent in Post architecture since 1910. It represents one of the many works-related projects that expanded the Post, principally in the 1930s and through the year 1940.

223 and 227 Warehouse (1897)

These similar warehouses were built in 1897 at a cost of $8700 as part of a complex of quartermaster, commissary, and ordnance warehouses along Halleck Street, just northeast of the 1890s parade ground (No. 94).

The complex relates to a major construction program of brick buildings on Post beginning in the 1890s. Wood shed additions have been made to No. 227, and the interiors of both buildings have been converted to offices. They are one-and-one-half story and have a cross-axial rectangular plan configuration, measuring roughly 32' × 114'. The buildings stand on random-course rock-faced stone foundations and have stretcher-bond red brick walls. The gable roofs, now clad in red asphalt shingles, include dormers with low pitched gable roofs. Plain brick chimneys are placed symmetrically at the center of the gable ends and are flush within the wall. There is a simple molded bow cornice with returns. Corbeled courses below the cornice are suggestive of architrave or bed moldings. Segmental-arch window openings are formed of three header courses. The windows are squared within the openings and are double-hung sash, six-over-six, with stone lug sills. Architecturally, the buildings exhibit conventional classical-derived stylistic elements, and may have some relationship to the "Colonial Revival," becoming popular in United States architecture at that time (Figure S1, S2).

228 and 229 Warehouse (1909 and 1897)

No. 229 was built in 1897 and No. 228 in 1909, at a cost of $4,300 and $11,000, respectively. No. 228 appears as a larger but similar version of the earlier No. 229. No. 228 was modified into the post dry cleaners by the addition of a new door, but no major interior changes were made. No. 229 was altered to house the post credit union with wood-frame additions and interior changes. These single-story buildings measure roughly 65' × 66' (No. 228) and 43' × 65' (No. 229) in plan with tall hip roofs topped at center by lantern-like monitors, also with hip roofs, that provide light and ventilation, originally for the bakery function. The buildings have tall, prominent brick chimneys. Rock-faced stone foundations are random-course, forming a water table; walls are common bond red brick. Roofs, now clad in red asphalt shingles, have eaves of partially exposed "S" curved rafter ends and attached outer fascia boards. Segmental-arch doorways have either the original wood paneled doors or modern aluminum and glass doors. Segmental-arch windows have lug sills and square headed double-hung sash, six-over-six. Architecturally, these buildings are similar in material and detail to other buildings in the Halleck Street grouping--Nos. 223 and 227 and No. 225--and display conventional stylistic elements of the period.

CHAPTER 3

APPLICATION OF CRITERIA OF ADVERSE EFFECT

Under Section 106 of the NHPA, an agency shall assess the effects on historic properties in accordance with 36 CFR 800.5 *Assessment of adverse effects*.[19] The NHPA defines an effect as an alteration to the characteristics of a historic property that qualify it for inclusion in or eligibility for the NRHP:

> *An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative.*[20]

The criteria of adverse effect are applied to all historic properties within the area of potential effects, with consideration given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. The criteria of adverse effect are used as a "threshold" for determining whether an undertaking will have an "adverse effect" or will it have "no adverse effect" (i.e. does an undertaking diminish a property's integrity or not?). In this instance, the entire NHLD is the "historic property" consisting of numerous contributing resources (buildings, structures, archaeological sites, etc.).

The integrity assessments for the Presidio NHLD and the APE that are used to support the finding of effect in this assessment are presented in Section 2 of this document.

According to 36CFR 800.5, an adverse effect on a historic property includes, but is not limited to:

i. Physical destruction of damage to all or part of the property

[19] 36 CFR 800.4[d][2]
[20] 36 CFR 800.5[a][1]

ii. Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines

iii. Removal of the property from its historic location

iv. Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance

v. Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features

vi. Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization

vii. Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance[21]

3.1 ADVERSE EFFECTS - DEFINITION

Adverse effects can be impacts to the physical material of a property (such as demolition, relocation, additions, deterioration, etc.), or an intangible element of a property (such as a view shed, visual relationship, ownership or management practices). According to 36 CFR 800.5(a)(1) "adverse effects may [also] include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative."[22] Assessing effects for a particular undertaking is dependent on evaluating the property's integrity as "the ability of a property to convey its significance." Past undertakings are considered because a series of actions could gradually erode a property's integrity. An effects assessment, therefore, examines the effects of a current undertaking within a broader cumulative context.

3.2 FORMAT FOR ASSESSING EFFECTS IN THIS DOCUMENT

The 2002 PTMP and 2010 Main Post Update FOE analyzed Alternative 1 (Presidio Trust Management Plan/Update). Building on the analysis contained in the Doyle Drive EIS/EIR, Alternative 2 (Presidio Parkway)

[21] 35 CFR 800.5(a)(2), "Assessment of Adverse Effects "incorporating amendments effective August 5, 2004.
[22] 36 CFR 800.5[a][1]

responds to the Doyle Drive Built Environment Treatment Plan and is consistent with the Doyle Drive Architectural Criteria Report. Since that time, the Presidio Trust has identified the parklands project as the "preferred alternative." Per the terms of Stipulation IV.C.2.d of the PTPA, this preliminary FOE focuses on the parklands project as the undertaking and applies the guidance set forth by the NHPA regulations and applicable Trust and other agency guidance to its analysis. The undertaking, along with a list and description of direct, indirect, and cumulative effects, is summarized below.

The FOE concludes with a summary of effects specific to the undertaking, followed by a cumulative effect assessment and discussion of how the undertaking would affect the Presidio NHLD.

3.2.1 ADDITIONAL DESCRIPTIVE MATERIALS

In addition to the text descriptions of effect findings, several sets of graphics have been included in this document in order to assist in illustrating its conclusions. These are:

Site Plans and Maps

This document includes several site plans and maps to help the reader understand the locations of specific buildings, predicted boundaries of archaeological sites and the relationship of the proposed project to the existing site. These were included earlier in the document as Figures A-D.

Key Visual Locations

Views 1-7 are the result of a view shed survey conducted to identify key locations around the Main Post Parade Ground and from Crissy Field where elements associated with the undertaking would be visible from historic resources. All photographs from the survey are included to provide context and views that were used to determine the presence of indirect adverse effects. The photographs also identify the entry to the site from the Main Post and Crissy Field, including captions describe possible changes that would take place as part of the undertaking.

Supporting Figures

Renderings and visual simulations represent the undertaking from various points of view within the project site and from a distance. They are included as Simulations 1-6.

VIEW 1: VIEW FROM ANZA STREET NORTH TO BUILDING 210 AND THE PROJECT SITE

VIEW 2: VIEW FROM THE PORCH OF BUILDING 105 NORTH INTO THE PROJECT SITE

VIEW 3: VIEW OF THE NON-HISTORIC PARKING AREA TO THE WEST OF BUILDING 210

VIEW 4: VIEW SOUTH FROM THE EAST ELEVATION OF BUILDING 603, TOWARD THE FUTURE MAIN POST BLUFF

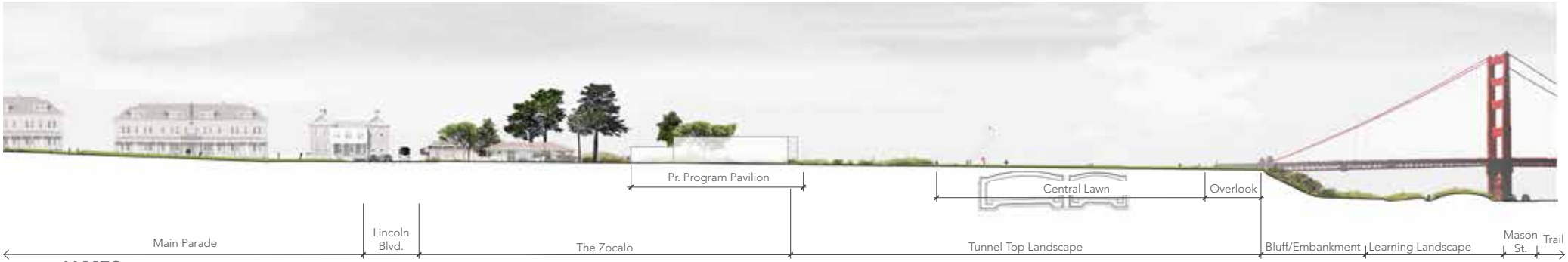
VIEW 5: VIEW NORTH FROM BUILDING 50, ACROSS THE PLAZA DE ARMAS, TO THE PROJECT SITE IN THE DISTANCE

VIEW 6: VIEW WEST FROM GIRARD AVENUE TO THE EASTERN PORTALS OF THE MAIN POST BLUFF TUNNELS

VIEW 7: VIEW FROM THE FOOT OF THE NATIONAL CEMETERY EAST TOWARD THE PROJECT SITE

SIMULATION 1: VIEW FROM MAIN PARADE FACING NORTHEAST

SIMULATION 2: VIEW FROM BAY TRAIL/MASON STREET FACING SOUTHEAST



JAMES
CORNER
FIELD
OPERATIONS

SIMULATION 3: CROSS SECTION VIEW

SIMULATION 4: AMPHITHEATRE FROM CRISSY FIELD

SIMULATION 5: ZOCALO

SIMULATION 6: LEARNING LANDSCAPE

Applicable Design Guidance

The Trust has developed several sets of design guidelines and treatment recommendations that are applicable to the APE in general and the project site in particular. These documents are summarized in the attached draft supplemental guidelines, along with project-specific direction around new construction and other landscape treatments. Additionally, the Trust has committed to incorporating architectural criteria described in the Doyle Drive Architectural Criteria Report that are unfulfilled by the Caltrans project upon handover of the site. A brief description of the applicable criteria is as follows:

Doyle Drive Built Environment Treatment Plan and Architectural Criteria Report[23]

The Doyle Drive Built Environment Treatment Plan (BETP) was prepared in 2009 as one of the measures to minimize and mitigate the adverse effects of the Doyle Drive Replacement (Presidio Parkway) project on the Presidio NHL, specifically, the destruction of the Bluff as a historic topographic feature, the removal of contributing buildings (204, 230, part of 201), as well as the alteration and removal of contributing roadways including Doyle Drive itself. The Architectural Criteria Report found within Appendix B of the BETP provides design guidance for future development in various subareas of the Presidio, including the Main Post Bluff, which is applicable to the parklands project. In general, the architectural criteria for this area call for the design of a new park to evoke the form of the historic bluff between the Main Parade and Crissy Field, and maximize physical and visual connectivity. The majority of these criteria have been met through the Presidio Parkway design that will be delivered to the Trust prior to construction of the undertaking.[24] The remaining criteria applicable to the parklands project, and the project's adherence to them, are provided below.

- *Preserve and enhance historic views from the bluff and the Main Post to Crissy Field and San Francisco Bay*. (The parklands project would visually and physically connect the Main Post with Crissy Field and the Bay through such design elements as the Bluff Walk, and the Anza Esplanade and West, Central and East Overlooks).
- *Preserve the historic distinctions between the designed cultural landscape of the Main Parade and the Main Post district and industrial utilitarian character of Halleck Street and the Crissy Field district.* (Landscape character on the upper portions of the project site would include limited lawns, ornamental plantings, walks and mature trees consistent with the character of the designed landscape; the Crissy Field portion would

[23] The Trust is committed to completing appropriate administrative processes involving the transfer of responsibility for fulfilling these criteria, in consultation with applicable parties, prior to concluding consultation on the New Presidio Parklands Project.

[24] See December 14, 2014 from the Treatment Oversight Panel to the Design Build Joint Venture, attached as Appendix B.

include plantings that relate to adjacent natural areas, natural materials, and use of a more informal and curvilinear design surrounding the Learning Landscape).

- *Use bluff as a vegetative buffer between the upper and lower post. Bluff planting should be low in character, low maintenance, and evoke the feeling of the historic bluff.* (The parklands project design would employ bluff plantings that are low in character, low maintenance, and would reflect the character of the coastal bluffs elsewhere in the park through the planting palette).
- *Preserve historic connections between upper and lower post along Halleck and Bank Streets.* (Halleck Street would be rebuilt by the Presidio Parkway project; the parklands project would include several connections between the upper and lower post, including a path in the approximate location of historic Bank Street, which was removed by the Presidio Parkway project[25]).

Mid-Crissy Area Design Guidelines

The Mid-Crissy Area Design Guidelines were developed by the Presidio Trust in 2011 to guide future development in this sub-district, including the removal and replacement of Building 610 (Commissary, 1989) and the expansion of Building 603 (PX, 1939) consistent with PTMP guidance, the Standards, and to avoid adverse effects to the Presidio's historic resources. The Guidelines provide direction for building reuse, parking, circulation, and landscape upgrades; they would be used by the Trust to review, develop, and evaluate project proposals in the sub-district, including the parklands project. The design guidelines most applicable to the parklands project, and the project's adherence to them, are provided below.

- *Retain the historic visual and physical relationship between Building 603 and Mason Street.* (The parklands project would retain and reuse Building 603, and would not alter the historic visual and physical relationship between this building and Mason Street).
- *Ensure that any new construction or building additions are sited and configured to be compatible with the historic district, and are sensitive to the prevailing architectural treatment, scale, massing, and orientation of the historic building clusters.* (The parklands project would expand Building 603 with new additions to the west that would be sensitive to the prevailing architectural treatment, scale, massing, and orientation of this historic building, through the application of the supplemental guidelines).
- *Retain and rehabilitate historic buildings in a manner that is consistent with the Secretary of Interior's Standards for the Treatment of Historic Properties. Design building additions and/or auxiliary structures, if*

[25] Re-establishing Bank Street in its exact historic location is not feasible due to the location of the western portals of the Main Post Bluff tunnels.

any, to be subordinate in square footage, mass, and scale to historic buildings. Site building additions and/or auxiliary structures so as not to compete with the historic entrances or features such as loading docks. Orient new construction to maintain historic relationships to Mason Street. (The parklands project would retain, rehabilitate, and expand Building 603 consistent with the supplemental guidelines, which were developed to guide the appropriate rehabilitation and expansion of Building 603).

- *Differentiate new construction and building additions from existing historic buildings, yet maintain compatibility according to guidance from the Secretary of Interior's Standards for Rehabilitation. Design the scale and dimensions of new building elements to respond sensitively to the scale of other Crissy Field structures.* (The parklands project would include additions to Building 603 that are differentiated from, yet compatible with, this historic building consistent with the supplemental guidelines).

- *Preserve views from the Main Post toward Crissy Field, the Bay and Golden Gate, and from Crissy Field to the National Cemetery and Main Post, by keeping the height of new construction below the bluff profile, which is approximately 35 feet above the existing ground elevation at Building 603.* (The parklands project would include additions to Building 603 that are subordinate to it in height, with an average height not to exceed 29.45' feet above the existing elevation, to preserve views from the Main Post toward Crissy Field and the Bay beyond, in accordance with the supplemental guidelines).

- *Enhance Mason Street's open streetscape and improve views by maintaining a built setback of at least 70 feet from the south edge of Mason Street.* (The parklands project would include additions to Building 603 that are at 70 feet from the south edge of Mason Street to enhance this street's open streetscape, avoid obscuring the west elevation of 603, and improve views in accordance with the supplemental guidelines).

Main Post Planning and Design Guidelines

The Main Post Planning and Design Guidelines were developed by the Presidio Trust in 2011 to recognize and protect the historic character of the Main Post's archaeological resources, historic buildings and cultural landscapes, so that future changes would not compromise its significance. The design guidelines contained within the Main Post Bluff subarea of the document are the most applicable to the parklands project, and only include the upper bluff area between Lincoln Boulevard and the Doyle Drive tunnels (not the lower bluff area between the tunnels and Mason Street). These guidelines, and the project's adherence to them, are provided below.

- *Locate new additions or elements as inconspicuously as possible, keeping in mind that buildings in this cluster are highly visible from all directions.* (The parklands project would eliminate Building 211 which currently obstructs views in this area, and replace it with a building no larger than 9,300 sq/ft that is oriented in line with Building 215 along Graham Street, outside of the historically significant views from the Main Parade, and in accordance with the supplemental guidelines).

- *Avoid additions of tall elements that will be visible from the Main Parade. Respect view corridors from other parts of the Main Post when planning changes to buildings in this cluster.* (The parklands project would remove Building 211 from the Main Parade viewshed, reestablishing historically significant views; the New Observation Post would be minimally visible from the Main Parade, lower than historic Building 210 and within height limitations set by the supplemental guidelines; the new building would also screen the parklands pedestrian area from the expanded parking lots to the east.

- *Locate any new additions or elements in a manner that emphasizes the openness and views of this predominantly landscaped area.* (See discussion above regarding Building 211 replacement).

- *Locate the Presidio Promenade close to the edge of the new bluff to take advantage of the views of Crissy Field and the bay. Include features such as benches, bike racks, and interpretive signage.* (The parklands project design would include a Bluff Walk connecting the East, West and Central Overlooks, all of which would take advantage of the views of Crissy Field and the Bay. Benches and interpretive signage would be provided in various locations along these pathways/overlooks. Bike racks would be made available closer to Building 215 and the proposed Zocalo).

- *Develop overlooks at selected locations that offer the best views*. (The parklands project would have a series of overlooks positioned strategically along the Bluff Walk to offer the best views. The proposed extension of the Anza Esplanade to the Central Overlook would also support this criterion).

- *Design level areas for informal play and gathering.* (The parklands project would include the Zocalo, an informal gathering point between Buildings 210 and 215, and a series of lawn areas between the East and Central, and Central and West Overlooks. Informal play, potentially including a children's playground, may be incorporated into the Learning Landscape closer to Mason Street).

- *Establish new north-south pedestrian circulation features to re-establish the historic connection between the Main Post and Crissy Field.* (The parklands project would provide four pedestrian circulation features to help re-establish the historic connections between the Main Post and Crissy Field (west stair, accessible path along the bluff face, amphitheater, Anza Esplanade between Central Overlook and the base of Halleck Street).

- *Design landscaped parking areas on the Main Post Bluff that use vegetation to screen and minimize the view of parked cars from the Main Parade. Ensure that parked cars located on the Main Post Bluff cannot be seen from Crissy Field.* (The parklands project would minimize views of parked cars from the Main Parade because they would be obscured by Buildings 210, 215, the New Observation Post and by additional landscaping. Views of parked cars from Crissy Field would be minimized, as they would be located upslope from Crissy Field, and obscured from view by the topography and vegetation planned for the tunnel tops).

- *Evoke the form of the historic bluff between the Main Post and Crissy Field, and maximize physical and visual connectivity between the two areas.* (The parklands project would incorporate landscaping on the tunnels and fill actions delivered by the Presidio Parkway project including plantings that evoke the character of a natural bluff face. This Bluff Walk, as well as the Anza Esplanade and the East, West and Central Overlooks, would also maximize the physical and visual connectivity between the two areas).

Main Post Cultural Landscape Report

The Main Post Cultural Landscape Report (CLR) was prepared by the Presidio Trust in 2012 to ensure that projects in the Main Post district are compatible with the landscape character of the NHLD. The CLR also builds on previous work, in particular the Trust's *Principles for the Future – A Cultural Landscape Assessment of the Main Post*, September 2002. The design guidelines contained within the Main Post Bluff subarea of the document are the most applicable to the parklands project. These guidelines, and the project's adherence to them, are provided below.

- *Ensure that new designs for areas affected by the construction of Presidio Parkway are compatible with the historic features of the Main Post and preserve or enhance historic views from the Main Post to the Bay.* (The parklands project would preserve and enhance historic views from the Main Post to the Bay through the inclusion of the Bluff Walk, the Anza Esplanade, East, West and Central Overlooks, the removal of Building 211 and its replacement with a structure of a similar size, and aligned with Graham Street and existing Building 215. All of these new features are intended to be compatible with the historic features of the Main Post).

- *Consider re-establishing north-south pedestrian connections that historically tied the Main Post to Crissy Field.* (The parklands project would re-establish the north-south pedestrian connections between the Main Post and Crissy Field directly from the four previously-described paths, and more indirectly from the proposed Bluff Walk).

As described above, the parklands project would positively address each of the applicable design criteria established in the four relevant planning documents, thereby preserving and enhancing the qualities and characteristics of the project area, and the NHLD as a whole.

3.3 EFFECTS UNDER THE PARKLANDS PROJECT

3.3.1 DIRECT EFFECTS

Demolition and Replacement of Building 211

The Observation Post (Building 211) would be demolished and replaced with a New Observation Post of equivalent size, but located outside of viewsheds to the north from the Main Parade. Although the design of the new building is at the pre-schematic level, it is conceived as an indoor-outdoor space ideal for shelter and events, including celebrations, ceremonies and meetings.

Removal of Building 211 would not adversely affect the NHLD as it is a non-contributor, and partially blocks some northerly views from the Main Parade Ground and adjacent historic buildings. The New Observation Post would be constructed along Graham Street, north of Building 215. It would be no larger than Building 211 (not exceed 9,300 sq/ft), and reoriented to conform to the directional axis of the Main Post and Parade Ground, as opposed to the irregular and off-set orientation of Building 211. Height limits and setbacks in the supplemental guidelines would make it subordinate to Building 210, the nearest historic building.

The current pre-schematic proposal for the New Observation Post meets the size, location and setback requirements that are described in the draft supplemental design guidelines. Specifically, the new construction would:

- Not exceed an average height of 68.61 feet above sea level, which is the peak of the roof of adjacent Building 215; the highest point of new construction would not exceed 80.85 feet above sea level, which is the ridgeline of nearby Building 210;
- Be organized on the site according to patterns of historic development in the area (e.g., perpendicular to Lincoln Boulevard and/or parallel with Graham Street);
- Be sited to the north and/or east of existing buildings so as to be minimally visible from the historic core of the Main Post.
- Maintain a set back from the bluff edge to avoid obstructing views from Crissy Field;
- Screen the non-historic parking area between Building 220 and Graham Street from the Main Post bluff landscape area to the west through the use of new buildings and/or landscaping;
- Serve as a replacement for non-historic Building 211 in order to re-establish views north from the foot of the Main Parade and the rear of Building 210;

- Not exceed 9,300 square feet of total new construction in the Main Post Bluff Sub-District (the approximate size of existing Building 211);
- Potentially breaking new buildings into smaller volumes in order to disperse their mass;
- Not destroy historic materials that characterize the property, differentiate the new work from the old, and be compatible with the massing, size, scale and architectural features of the Main Post bluff's historic resources; and
- Adhere to the appropriate building materials and color palettes identified in the supplemental design guidelines

In sum, the removal and replacement of Building 211 would not diminish the location, association, setting or feeling of Building 210 or the Main Post cultural landscape. The replacement of Building 211 is currently at the pre-schematic level. As the design progresses, adherence to the supplemental guidelines would ensure that the new building is compatible with the NHLD, and does not diminish the design, materials or workmanship of adjacent historic resources and the landscape, and that the new construction is consistent with the Standards so that adverse direct effects would be avoided.

Rehabilitation and Expansion of Building 603

The Crissy Field Center (Building 603) would be rehabilitated, and a two new classroom and program support structures would be constructed to the south of Building 603 to house additional program space for the Crissy Field Center activities and for the adjacent Learning Landscape.

The design of the expansion of Building 603 is also at the pre-schematic level. The new buildings would include a Field Station and Classroom structures to house additional program space. The new buildings would not exceed 7,500 square feet in total and no single building would exceed 5,800 square feet. The new construction would be located to the south of Building 603 and set back from Mason Street.

Specifically, the new construction would:

- Maintain a 70-foot setback from Mason Street so that the west elevation of the historic building is not obscured;
- Not exceed 34 feet above sea level (the height of the new Main Post bluff elevation); the average height of the roof of the new structure(s) would not exceed 29.5 feet above sea level (the bottom of 2nd floor window openings on the south elevations of Building 603);

- Favor permeable and open facades that allow for strong connections between interior uses and street life and/or exterior spaces;
- Break new buildings into smaller volumes in order to disperse their mass over this once-densely built site;
- Not exceed 5,800 square feet in any single building adjacent to Building 603 (half the size of the building); not exceed 7,500 square feet in the vicinity of 603; and would not exceed 10,000 square feet of total new construction within the Crissy Field portion of the project site;
- Concentrate new deck elements, as needed, on the south side of the building, except where to provide universal access to the building's elevated first floor plate;
- Incorporate flood control measures into the construction of the building to help minimize damage from flooding; and/or design new construction that is temporary in nature, or can be easily repaired or replaced in the event of damage due to flooding; and
- Incorporate informal play, potentially including a children's playground, into the Learning Landscape consistent with existing guidelines; and
- Adhere to the identified Building 603 character defining features and treatment recommendations, as well as the list of appropriate building materials and color palettes identified for the supplemental design guidelines; and
- Place compatible new structures in the vicinity of Building 603, which was historically part of a more densely built setting than it is today.

In sum, the rehabilitation and expansion of Building 603 would not diminish the location, association, setting or feeling of the Mid-Crissy Field and Main Post cultural landscapes or adjacent historic properties. The rehabilitation of Building 603 is currently at the pre-schematic level. As the design progresses, it would follow treatment recommendations in the draft supplemental guidelines regarding retention of all remnant character defining features, and for new interior elements to follow the Secretary's Standards. Adherence to the design guidelines would avoid inappropriate alterations to the design, workmanship and materials of building 603, and thereby avoid direct and indirect adverse effects to the resource.

By following the supplemental design guidelines, the new buildings would be subordinate to Building 603 in height and position relative to Mason Street, and the Bluff to the south, and placed within a context that was historically densely-built. While the new buildings would be a visible new addition to the landscape, they would be relatively small in size, and located approximately 850 feet away from the north end of the Main Parade Ground. Visibility of the new buildings from the majority of the NHLD would be minimal, helping to maintain the

integrity of the setting and feeling of Main Post and Crissy Field. In addition, views of the new facility when approaching them along Mason Street would be largely shielded from view from the larger and taller Building 603, and due to the 70-foot setback from Mason Street.

Circulation Features and the Overlooks

The Presidio Parkway would deliver to the Trust a newly-built bluff feature, on which the parklands project would construct three overlooks, an east/west Bluff Walk and four major north/south paths to connect the Main Post and Crissy Field. The presence of multiple connections and overlooks follows design criteria found in all planning and guidelines pertaining to this area, beginning with the 2002 PTMP. While the landform on which these features would be built is entirely new, the paths would support connectivity between the upper and lower posts that existed during the period of significance, and the overlooks would reference views from the Main Post to the Bay that are connected to the Presidio's founding as the "Guardian of the Gate."

Moving from west to east, the following circulation features are part of the undertaking:

- The West Stair generally follows the course of historic Bank Street (removed by the Presidio Parkway), consistent with the Doyle Drive Architectural Criteria pertaining to this feature;
- The Amphitheatre stairs would be partially planted in order to create a combined landscape/hardscape feature;
- The Anza Esplanade would be extended to connect the Main Parade to the new Central Overlook, and then to the east to meet Mason Street near the intersection with Halleck;
- While the hardscape materials of the new overlooks and paths would differ from the original informal, dirt paths connecting the upper and lower posts, the new flatwork would be compatible with existing paved features in the Main Post and Crissy Field so as to achieve compatibility of materials, design and workmanship in this rehabilitation context;
- The Anza Esplanade and Central Overlook would maintain the setting and feeling of the Main Post and the Mid-Crissy areas, and support fulfillment of the Historic Preservation Criteria provided in the Doyle Drive Architectural Criteria Report (Caltrans 2008).

The West, Central and Eastern Overlooks, would consist of battered concrete platforms at the new bluff feature's edge, built into the landscape in a manner that references but does not mimic the historic batteries farther to the west. The spaces would provide viewing and gathering points, and direct visual connections to the larger landscape, including Crissy Field, the Bay and the Golden Gate Bridge and Alcatraz in the distance, while lending a strong sense of place and a reminder of the Presidio's historic connection with the San Francisco Bay.

At the center-point of the Overlook would be a two-dimensional (i.e., flat), interpretive element in the hardscape dedicated to telling the story of the military at the Presidio and service of individuals to their country. This interpretive element (placeholder name: the "Compass Rose") would serve as a reminder of the significance the Presidio has played in the U.S. Pacific Rim theater and beyond. Each line would be drawn to depict and name the expeditions and deployments from the Presidio to global sites around the world. Standing at the promontory and looking out, visitors would be firmly grounded in the history and service of the Presidio. The circulation features and overlooks would support existing design and planning guidance for the Main Post and Crissy Field, and be compatible with the historic character of both districts. For these reasons, the new features would have no direct or indirect adverse effect on the NHLD.

Zocalo

A new 'Zocalo' would function as the primary arrival and gathering plaza between the Transit Center (Building 215) and the proposed Visitor Center (Building 210). The non-historic paved parking lot that currently exists in this location would be replaced by a new, landscaped pedestrian plaza, and would retain the existing cluster of mature Monterey cypress trees as a focal point of the plaza. Retention of mature trees coupled with the removal of non-historic hardscape areas would avoid adverse effects to existing landscape features. Reactivation of this auto-dominated space with a multi-functional pedestrian plaza would be compatible with the character of the Main Post and the adjacent Visitor Center (to be rehabilitated under a separate action). New hardscape features, landscaping and furniture would not detract from the setting and feeling of the Main Post cultural landscape or the adjacent Building 210.

Landscape & Hardscape

The parklands project would install landscaping on the new bluff feature that would be delivered to the Trust by the Presidio Parkway project, as well as adjacent areas at the north (Learning Landscape), east (Building 201) and south (Zocalo) edges of the project site. The Learning Landscape would be built on an area most recently occupied by a non-historic PX/Public Storage facility and several acres of asphalt parking lots (all removed by the Presidio Parkway project). During the period of significance, the Learning Landscape area was part of the larger Bayfront slough, and then later a densely built, light-industrial warehousing and transport district (see pages 9-20 of the supplemental design guidelines for a detailed description of the site's history).

The rehabilitation treatment under the parklands project would seek to reestablish elements of the area's natural character, in addition to structures and amenities supporting its newly-envisioned environmental education program. The character of this new landscape would be compatible with the setting and feeling of adjacent natural areas, and all new features would be small-scale and subordinate to existing historic resources (Building

603, Mason Street). Adherence to the supplemental guidelines and applicable Mid-Crissy Area Design Guidelines would avoid adverse effects as design advances beyond the pre-schematic level.

The landscape on the newly built bluff feature would follow existing guidance in the Doyle Drive Architectural Criteria Report relative to differentiating the landscape character of the Main Post, bluff face, and Crissy Field. Landscaping on the Main Post portion of the project site would be ornamental in character, with limited lawns and informal gathering (picnic) areas that are differentiated from historically significant lawns, and streetscape plantings as described in the Main Post CLR and Mid-Crissy Area Guidelines. The bluff face would reference the natural coastal bluff plantings in the western portions of the park. Crissy Field portions of the project site would strike a balance between naturalistic landscape areas (Learning Landscape), and spare, utilitarian landscaping associated with Building 603 and the new Crissy Field Center program facilities. Adherence to the supplemental guidelines, and applicable guidance in the CLR, Mid Crissy Area Guidelines, would maintain the setting and feeling of the associated planning districts and avoid adverse effects to the landscape and the NHLD as a whole.

Halleck Street and Lincoln Boulevard are historic roadways that contribute to the NHLD. Segments of these streets would be altered as part of the Presidio Parkway reconstruction project, and are common to all project alternatives, including the undertaking. Alterations to these historic roadways have been previously addressed in the Doyle Drive EIS/EIR and the 2002 PTMP and 2010 Main Post Update.

These new park elements would be consistent with the wider landscape character of the Main Post and Mid-Crissy areas, and support fulfillment of the Historic Preservation Criteria provided in the Doyle Drive BETP and Architectural Criteria Report (Caltrans 2008).

3.3.2 INDIRECT EFFECTS

The parklands project would be visible from approximately 19 historic buildings and the Main Parade, which contribute to the NHLD, and have the potential to indirectly affect them as a result of the change to their historic setting. These include historic buildings on the northerly end of the Main Post, to either side of the Main Parade Ground, as well as those along Lincoln Boulevard and Halleck Street. The parklands project would result in minimal visible changes to the landscape when viewed from these contributing resources, especially in northeasterly and northwesterly directions. Views from these resources across the project site would be enhanced by the removal of the non-contributing Building 211, which currently blocks some northerly views in the vicinity of the project, and its replacement with a New Observation Post of similar or smaller size that is oriented to the directional axis of the Main Post. Views from these resources would not be affected by the removal of non-historic parking lots and paved areas around Buildings 210 and 215, and the replacement of this area with a landscaped plaza (Zocalo). The proposed walks and overlooks would be visible new landscape elements visible from most of these resources. New walkways would be relatively flat, two-dimensional linear features placed on the ground

plane of the new landscape, which would not interrupt views from adjacent resources or otherwise detract from the setting and feeling of the project area. Plantings designed to complement the landscape character of the marsh, bluff, and Main Post, and would also serve to harmonize the project area within the larger context of the Main Post, Crissy Field and Letterman planning districts. For these reasons, the undertaking would have no adverse, indirect effects to individual resources or the NHLD.

The undertaking would result in a visible change to the landscape when viewed from contributing resources in the project area, due primarily to new construction (New Observation Post), building rehabilitation and expansion (Building 603) and key project elements (Anza Esplanade Extension and Central Overlook, Zocalo and Bluff Walk). However, conformance with applicable design guidelines and planning documents would ensure that the design and construction of the New Observation Post and Crissy Field Center expansion are consistent with the Secretary's Standards, resulting in a new structure or structures that are compatible with the character defining features of the NHLD and its contributing resources, including the setting and feeling of the NHLD in the project area. The Anza Esplanade Extension and Central Overlook, Zocalo, and Bluff Walk would be compatible with established design criteria and would therefore enhance the qualities and characteristics of the project area and the NHLD as a whole.

3.3.3 EFFECTS TO KNOWN ARCHAEOLOGICAL SITES

The undertaking has been designed to avoid adverse effects to known and predicted archaeological areas of the NHLD. Archaeological oversight would be built into all design and construction phases to ensure that the archaeological deposits associated with either the Quartermaster Complex, Quartermaster Dump, Stream Ravine Dump or the pre-contact occupation of the area are preserved in place and to provide a plan of action in the event of an inadvertent discovery. An Archaeological Management Assessment (AMA) (Jones/Trust 2015) has been prepared for the project in accordance with the Presidio Trust Programmatic Agreement (PTPA). An Archaeological Monitoring Plan (AMP) and, if necessary, an Archaeological Identification Plan (AIP) will be prepared to guide implementation of the proposed project or alternatives.

Quartermaster Complex

The Quartermaster Complex is expected to be a series of shallowly buried building elements (foundations) and associated trash deposits. Previous archaeological testing of the unpaved areas did not locate intact archaeological deposits that could be securely associated with the Quartermaster Complex (Jones and Stokes 2002). Pavement over a large portion of the area prevents archaeological identification testing prior to construction. Therefore, archaeological identification testing and monitoring of ground disturbance would be employed during construction to ensure the avoidance of adverse effects. Archaeological features that retain integrity or contribute to the significance of the Quartermaster Complex archaeological area would be identified,

documented and preserved in place during construction. If testing identifies archaeological features with integrity that contribute to the significance of the Quartermaster Complex, new construction would be designed to avoid these features.

Quartermaster Dump

The Quartermaster Dump archaeological area is expected to be a very dense deposit of trash buried below at least 3 feet of fill (Trust/Blind and Barnaal 2008 and adjacent archaeological investigations). Under the parklands project, the rehabilitation and expansion of Building 603 and the adjacent Learning Landscape are at least partially within the Quartermaster Dump Archaeological Area. In order to avoid adverse effects to this deposit, design efforts to date have focused on keeping required project elements within the upper 3 feet below current ground surface and/or using imported fill to raise grades across the site. If during the schematic phase, it is decided that deeper elements are required, archaeological identification testing will determine if archaeological deposits are present. If archaeological deposits that contribute to the Quartermaster Dump archaeological area are identified, the project would be redesigned to avoid these resources. Archaeological monitoring would be conducted during construction to ensure that any archaeological deposits that are inadvertently discovered are documented and treated appropriately.

Stream Ravine Dump

All alternatives call for new landscaping west of Building 210 over the Stream Ravine Dump archaeological area. Any archaeological deposits associated with the Stream Ravine Dump are expected to be buried at depth (5+ feet below current ground surface) and would not be impacted by the proposed project (Blind and Barnaal 2008). If project plans change to include substantial excavation, additional archaeological consultation would be built into the design. Archaeological monitoring would be conducted during construction to ensure that any archaeological deposits that are inadvertently discovered are documented and treated appropriately.

Pre-Contact Sensitivity

Project elements north of the slope embankment are considered to be sensitive for pre-contact archaeological deposits. Archaeological deposits associated with the pre-contact occupation of the Presidio are expected to be buried below historic soils brought in to fill the marshlands. Archaeological testing (Jones and Stokes 2002; GANDA 2013) and geo-archaeological modeling for the Doyle Drive Replacement project (GANDA 2013) suggest that the potential to locate pre-contact deposits is low and that any deposits with physical integrity would likely be deeply buried. Archaeological monitoring would be required during construction to ensure that any pre-contact archaeological deposits that are inadvertently discovered are documented and treated appropriately.

Conclusion

The undertaking has a low likelihood for adversely affecting any known or predicted archaeological properties in the project area. Archaeological resources would be protected by adhering to procedures outlined in the PTPA. Archaeological monitoring of ground disturbing activities during construction would ensure that there are no adverse effects to known or predicted archaeological areas or any deposits that are inadvertently discovered during construction. An Archaeological Monitoring Plan (AMP) will guide this monitoring once design is complete and before construction commences. The AMP specifies the location, frequency and duration of required archaeological monitoring and the steps to ensure appropriate treatment of any resources discovered during construction. Archaeological Treatment Plans for individual sites and the AMP prepared for previously unknown sites would ensure that any discoveries are handled in accordance with all stipulations of the PTPA.

3.3.4 CUMULATIVE EFFECTS ON PRESIDIO NHLD

The cumulative effects analysis considers all past, present, and future projects in the NHLD which have the potential to combine with the effects of the undertaking to form an adverse cumulative effect on the NHLD. This analysis considers undertakings for which compliance has already been completed, as well as those that are anticipated by the Presidio Trust (such as the Mason Street Warehouses) or by another lead agency (such as the treatment of Building 1199 by the NPS).

In terms of past and completed projects in the NHLD relevant to the cumulative analysis, the following projects have been taken into consideration:

- Rehabilitation of Crissy Field (completed in 2001), which removed 32 historic buildings to restore earlier historic and natural features and to introduce parking for recreational activities.
- The construction of the Letterman Digital Arts Center (completed in 2005), which replaced non-historic buildings and a large parking lot with compatibly designed new buildings and landscape.
- The replacement of Doyle Drive (which began construction in 2009), which is in the final stages of replacing the historic elevated roadway with a new parkway, which included the removal of historic buildings and streets, and the reconfiguration of the historic Main Post bluff to accommodate the parkway.

All three of these projects have affected the NHLD due to removal of contributing resources and the introduction of new elements.

The Trust found the following current and future projects relevant to the cumulative effects analysis because they have a bearing on the effects of the undertaking:

- Current use of Building 50 (Presidio Officers' Club) as a recently transformed cultural center (Trust): The Officers' Club features exhibits about the Presidio's history, a destination restaurant, free public programs including live music and dance, talks, films, and family activities, and event and education spaces.
- Future use of Buildings 1182-1188 (Mason Street warehouses) as a sporting goods store and recreational program center (Sports Basement) (Trust): The store will promote healthy lifestyles and enjoyment of the park by selling athletic gear and apparel, offering free fitness classes, facilitating group workouts, and hosting educational and cultural events.[26]
- Future use of Building 210 as the Presidio Visitor Center to serve as an interpretive/orientation portal between the historic Presidio and New Presidio Parklands/Crissy Field (Trust): Visitors with a short amount of time will be able to quickly find the tools and resources necessary to identify and go to specific destinations. Others will encounter interpretive storytelling devices (including interpretive retail products) to help inspire and guide their travels.
- Future use of Building 610 (former Commissary) building as a museum or cultural center (Trust): Multiple activities have been contemplated for the site. Responses have included exhibition spaces for permanent and changing exhibitions; indoor and outdoor activities; educational programs and activities; access to Crissy Field, the Bay shoreline and Presidio trails; food service; theater and performance space; large, visible green areas; and sculpture and art.
- Future restoration of Quartermaster Reach (Trust): An approximately 850-foot length of stream, currently running through a subsurface culvert that ultimately discharges to Crissy Field Marsh at the northern-most (lowest) end of the Tennessee Hollow watershed near the Presidio Parkway, will be "daylighted" in order to restore (create) wetland habitat.
- Potential repairs and improvements to Crissy Field ("Crissy Refresh") (NPS): While still speculative and under development, this could include repair and rehabilitation, additional capital upgrades, and potential changes to facilitate program enhancements.

[26] With regards to adverse effects identified in association with the Mason Street Warehouse/Sports Basement, those would be localized to the group of warehouses, and, when combined with the effects of the undertaking, would not rise to the level of cumulative adverse effects to the NHLD. The balance of these current and future projects, when added to the effects of the undertaking, would have no adverse cumulative effects to the integrity of the NHLD because they would promote new uses compatible with the existing uses within the NHLD, and would rehabilitate historic buildings and landscapes, all of which would adhere to the guidance provided in existing Trust and NPS planning documents.

- Potential long-term use of Building 1199 (temporary Crissy Field Center) for as-yet-undefined park related and public uses (NPS): Suggested uses include reuse or repurpose for East Beach; lease for income; kayak, bike and other recreational equipment rentals; food service or event rental; and outpost for Crissy Field Center (Building 603).

These past projects, when added to the effects of the undertaking, would have no adverse cumulative effects on the NHLD, because the projects would replace non-historic buildings with new buildings of a similar or smaller scale (future use of Building 610 as a museum or cultural center, long term use of Building 1199), rehabilitate buildings for compatible new uses requiring minimal alteration of the character-defining materials, features, spaces, and spatial relationships of the buildings and their settings (Building 50/Officers' Club cultural center, Mason Street Warehouses sporting goods store, Building 210 Visitor Center, long-term use of the Palace of Fine Arts), and execute landscape improvements that are consistent with pre-existing guidance developed explicitly to avoid adverse effects to historic resources (restoration of Quartermaster Reach, Crissy Refresh).The parklands project (undertaking) would also support minimization and/or partial mitigation of the previously identified adverse effects from a much larger undertaking (replacement of Doyle Drive), adhere to applicable planning and design guidelines, and maintain the integrity of the NHLD.

For these reasons, the undertaking would have no adverse cumulative effects on the NHLD in consideration of all relevant past, present, and future projects.

Cumulative Effects to Archaeological Resources

Ground-disturbing activities associated with the future use of the Commissary, when combined with those of the undertaking, could adversely affect archaeological sites at a cumulative level. These future projects could also adversely affect unknown sites that may be identified through future research or an unanticipated discovery. Similar to the requirements for the undertaking, archaeological review would be required before undertaking or permitting all future ground-disturbing activities, and any ground-disturbing activities that may affect known or predicted archaeological sites would be evaluated and subject to a range of requirements including, but not limited to, avoidance of the sites, monitoring, coring or trenching, and testing and/or data recovery. Finally, all artifacts found would be catalogued, appropriately treated, and properly stored or displayed according to applicable federal standards and the Trust's Archaeological Collections Management Policy. The implementation of these requirements for all past, present, and future projects, including the undertaking, would avoid or mitigate potential adverse cumulative effects to known and unknown archaeological sites in the NHLD.

CHAPTER 4

CONCLUSION

Following consultation, the Trust, National Park Service and California State Historic Preservation Officer reached agreement on a conditional finding of no adverse direct, indirect or cumulative effect for the Presidio Tunnel Tops undertaking. Table 4.1 updates the Preliminary FOE's findings to reflect this outcome.

4.1 PRESIDIO TUNNEL TOPS PROJECT FINDING OF EFFECT MATRIX

Project Element	Direct Effect	Indirect Effect	Cumulative Effect
Building 211 Demolition and Replacement with a New Observation Post	Removal of a non-contributing building will result in no direct adverse effect (proposal for replacement new construction was eliminated from the project).	No indirect adverse effect to adjacent historic properties (210 and other nearby Main Post buildings).	No adverse cumulative effect to the NHLD.
Building 603 Rehabilitation and Expansion to support the Crissy Field Center Program	No direct adverse effect. Rehabilitation and expansion will follow agreement reached through consultation and verification under the terms of the conditional no adverse effect determination.	No indirect adverse effect to adjacent historic properties by following agreement reached through consultation and verification under the terms of the conditional no adverse effect determination.	No adverse cumulative effect to the NHLD by following agreement reached through consultation and verification under the terms of the conditional no adverse effect determination.

Project Element	Direct Effect	Indirect Effect	Cumulative Effect
Circulation Features & Overlooks	No direct adverse effect. New elements compatibly designed on a new landscape feature based on agreement reached through consultation and verification under the terms of the conditional no adverse effect determination.	No indirect adverse effect to adjacent historic properties or landscapes by following agreement reached through consultation and verification under the terms of the conditional no adverse effect determination.	No adverse cumulative effect to the NHLD by following agreement reached through consultation and verification under the terms of the conditional no adverse effect determination.
Presidio Visitor Center Plaza	No direct adverse effect. New element replaces non-historic parking lot with compatibly designed hardscape/landscape feature and furnishings, consistent with agreement reached through consultation and verification under the terms of the conditional no adverse effect determination.	No indirect adverse effect to adjacent historic properties or landscapes by following agreement reached through consultation and verification under the terms of the conditional no adverse effect determination.	No adverse cumulative effect to the NHLD by following agreement reached through consultation and verification under the terms of the conditional no adverse effect determination.
Landscape & Hardscape	No direct adverse effect. New elements compatibly designed on a new landscape feature, consistent with agreement reached through consultation and verification under the terms of the conditional no adverse effect determination.	No indirect adverse effect to adjacent historic properties or landscapes by following agreement reached through consultation and verification under the terms of the conditional no adverse effect determination.	No adverse cumulative effect to the NHLD by following agreement reached through consultation and verification under the terms of the conditional no adverse effect determination.

CHAPTER 5

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Presidio Trust

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2009 South Access to the Golden Gate Bridge Doyle Drive, Historic Property Treatment Plan for the Built Environment.

CHAPTER 6

LIST OF PREPARERS

6.1 ESA

Brian Ramos, PhD (Principal Investigator): Dr. Ramos is a professional archaeologist and Regional Director for ESA with 25 years of experience in the historic preservation field. Prior to joining ESA, he was a Cultural Resources Project Director and Bay Area Branch Manager with ICF Jones & Stokes. Prior to ICF, he was the Cultural Resources office chief for Caltrans District 4 in the Bay Area where his unit was responsible for all cultural resource studies and Section 106 compliance efforts for the nine county Bay Area. He has worked for various professional archaeological consulting firms and was previously the Maui Island Archaeologist for the State of Hawaii Office of Historic Preservation (SHPO). Dr. Ramos holds a PhD in Anthropology from the University of California, Davis with a focus in California and Great Basin archaeology and meets the Secretary of the Interiors Standards as a Professional Archaeologist.

Brad Brewster (Project Manager): Brad is an architectural historian and preservation planner with 22 years of experience in historic preservation field. He is a Manager within ESA's Cultural Resources Group, and is responsible for the preparation and/or review of all historic-architectural resources studies for the firm. He has completed numerous historic evaluations required under Section 106 of the National Historic Preservation Act, and has documented many historic buildings in accordance with the Historic American Building Survey/Historic American Engineering Record (HABS/HAER) standards throughout the San Francisco Bay Area.

6.2 PRESIDIO TRUST

Rob Thomson, MS (Acting Federal Preservation Officer): Mr. Thomson manages the NHPA compliance program for the Presidio Trust. His previous experience has included archaeological fieldwork at historic sites in the Virginia Piedmont, San Francisco Bay area and Tanzania; he has also researched and published work on the development and evaluation of architectural preservation training programs in the Balkans and Southeast Asia. He meets the Secretary of the Interior's Standards for work in architectural history. Mr. Thomson holds a BA in Archaeology from the University of Virginia and an MS in Historic Preservation, with a specialization in Preservation Planning, from Columbia University.

Michelle Taylor, MS (Historic Compliance Coordinator): Ms. Taylor reviews, monitors and evaluates projects within the Presidio Trust to ensure all undertakings are in compliance with Section 106 of the National Historic Preservation Act. She also researches and prepares a wide range of assessment reports on historic, or potentially

historic, buildings, structures, districts, and landscapes. Ms. Taylor has 10 years of experience in the field of Historic Preservation. Prior to joining the Presidio Trust in 2012, Ms. Taylor worked in the private sector at an architecture and real estate development firm in San Francisco. Ms. Taylor holds a B.A. in History from the University of California, Berkeley and an M.S. in Historic Preservation from Columbia University.

ATTACHMENT

3 NPS AND SHPO LETTERS

JAMES
CORNER
FIELD
OPERATIONS

NATIONAL PARK SERVICE 1

United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94123

IN REPLY REFER TO:
D18 (GOGA PROJ)

June 1, 2015

The Presidio Trust
Attn: John Pelka, New Presidio Parklands Project EA
103 Montgomery St.
P.O. Box 29052
San Francisco, CA 94129-0052

Dear Mr. Middleton:

We wish to acknowledge and support the Presidio Trust in its planning efforts for the New Presidio Parklands, especially the widespread, thoughtful public engagement and outreach and collaborative nature of consultation with the National Park Service (NPS) and Golden Gate National Parks Conservancy. This is an important transformation for the Presidio landscape that will connect the Main Post and Crissy Field, and the alternative concepts presented reflect responsiveness not only to the sensitive surroundings, but also the depth of public comment and input received to date. Park leadership and project staff have appreciated the many avenues provided to express the park's interests in the project and we look forward to continuing the conversations and rich discussions.

We offer the following observations and comments as part of the scoping process for the New Presidio Parklands Project Environmental Assessment (EA), pursuant to the National Environmental Policy Act (NEPA). These comments are in addition to those previously submitted by the National Park Service as part of the National Historic Preservation Act (NHPA) consultation process under the Presidio Trust's Programmatic Agreement.

Visitor Center Plaza
We are pleased with the progress our teams are making with the Presidio Visitor Center design for Building 210. We support the concepts being explored to provide a warm, welcoming landscape that allows for public gatherings, and the provision of basic visitor needs such as restrooms and other amenities. We look forward to continuing to work together on this important indoor/outdoor interface at the Visitor Center.

Crissy Field Center
The NPS is supportive of the concept of expanding the Crissy Field Center and creating an adjacent "learning landscape" designed specifically for youth and families in order to meet our joint Park Youth Collaborative goals of serving more young people, especially those that come from under-represented communities. At the same time, we are eager to discuss the programmatic roles of each of the partners in this effort and how we will collaboratively contribute to the overall management and implementation of this effort, including future programs.

Impact Topics
We understand that the New Presidio Parklands EA will be tiered from previously approved plans and NEPA documents – namely the Presidio Trust Management Plan, the Main Post Update, and Doyle Drive Replacement project. With that in mind, we believe that the impact topics analyzed in the Main Post Update Final Environmental Impact Statement should be included in this EA. Of those topics, we believe the effects on visual resources, visitation, water resources, and transportation and parking are especially important to examine. In addition, we would suggest that the effects on the dark night sky and on climate change adaptation also be included in the analysis.

Building Removals
We fully support the removal of Building 211 in order to open up the view corridors near the Visitor Center, and we discourage any replacement construction on this same site that could block the views from the north side of the Visitor Center. If new construction is pursued here, the complex of structures in this area should be carefully thought through with regards to visitor experience, wayfinding, form and function to be successful. Any new construction in the National Historic Landmark District needs to be thoughtful and compatible.

Although the former Commissary building is outside of the project area, we believe that its future should be considered with the current planning effort, or as soon as possible. We believe that restoration of the site to a natural condition may be the highest and best use for the site in the long-term. At a minimum, removal of the former Commissary and replacement with a smaller, more compatible, public-serving function should be considered as soon as possible. The Commissary's location makes it undeniably part of the adjacent landscape's transformation and visitor experience, especially as part of the southward viewshed, and its incompatibility will be increasingly evident once the new parklands are built.

Area A/B Connection
As we have discussed, it will be important to achieve welcoming connections-visually as well as physically- between the Main Post and Crissy Field, and Areas A and B. We look forward to continuing the dialogue and finessing the details around this, particularly along Mason Street. We will continue to be involved in the circulation planning for pedestrians, bicyclists, and vehicles along Mason Street and specifically at major nodes or crosswalks on Crissy Field.

One of our concerns is the potential effect on access to Area A lands and parking demand in Area A as a result of the new Presidio Parklands improvements, especially if the new parklands in Area B become a major visitor destination. As previously stated, we have concerns about these types of impacts with the proposed relocation of Sports Basement to the Mason Street warehouses at the east end of Crissy Field. The cumulative analysis section of the EA should address this topic and identify appropriate monitoring and mitigation measures.

3-1

Crissy Refresh
As you are aware, the Parks Conservancy and NPS are contemplating a "refresh" to the beloved Crissy Field planning area. Key visitor amenities, such as the Promenade, Crissy Air Field, Mason Street, and vehicular circulation and parking are in need of repair and improvement. The Conservancy and NPS will engage the Presidio Trust directly in the planning process for this project in the near future; however, since this project is on a different schedule than NP3, we recommend you utilize Crissy Field's existing conditions as the baseline for the environmental analysis, with a reference to the future planning in the cumulative impact analysis.

Again, we applaud the Presidio Trust on the engaging, creative, and exciting planning process underway for the New Presidio Parklands and we look forward to the continued collaboration on this important project.

Sincerely,

Chris Lehnertz
General Superintendent

Cc: Greg Moore, GGNPC

3-2

NATIONAL PARK SERVICE 2

United States Department of the Interior
NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason # 201
San Francisco, California 94123

IN REPLY REFER TO:

H4217 (GOGA-CRMM)

Craig Middleton
Executive Director
Presidio Trust
Attn: Rob Thomson
103 Montgomery Street
P.O. Box 29052
San Francisco, CA 9589412916

Dear Mr. Middleton:

This letter serves to provide consolidated comments from the National Park Service, both Golden Gate National Recreation Area and the Pacific West Regional Office, on the Second Consultation Package for the New Presidio Parklands Project under Stipulation IV.C.2 of the Presidio Trust Programmatic Agreement. The Second Consultation Package contains a draft Area of Potential Effect (APE) and a Description of Preliminary Concept Alternatives.

We consider the APE to be very generous, and thus, it would seem consistent to also include the Letterman Planning Area, since substantial portions of the project are adjacent to this planning area. However, we do feel that the APE justification statement that "the potential for the undertaking to affect the NHLD as a whole is negligible" is somewhat of an overstatement, since the undertaking can certainly affect the views from a wide swath of Crissy Field and Main Post and Letterman, especially if highly-visible incompatible elements are introduced.

In Elements Common to All Alternatives, it is not made sufficiently clear that the reason the expansion of the marsh to the east of the Commissary has to be reduced is because this location is outside of the project area.

As we proceed to specific comments on the alternatives, it would aid in our understanding of all alternatives if contour lines were included on the plan views. The addition of sectional drawings would also be very helpful, as would further perspective renderings of important landscape elements. For instance, perspective renderings of certain meadow areas, gardens and overlooks and other activity focus areas would greatly help clarify design intent. Renderings of all alternatives and options as seen looking up from Crissy Field, the Main Post, and Letterman are especially important in order to fully understand the effects of the project on the neighboring historic district.

Alternative 1 has, at least, the virtue of simplicity. The predominance of open sight lines and native plantings are essential elements to build upon for all the following alternatives. However, the retention of Building 211 and the large amounts of new parking are elements that we feel should not be brought forward into further design development.

Alternative 2 has far too much lawn to be acceptable in an era of drought and global warming. The main circulation network seems as if it is forced upon the landscape, while its geometry references neither the rectilinear features historically upon the bluff top, nor the contour lines of the bluff. The location of the additional parking immediately east of the Visitor Center intrudes too much on the park-like setting with which it is more desirable to surround that facility.

Alternative 3/1 (and the remaining "concepts") indicate that Building 211 is removed, which is a crucial element for the appropriate rehabilitation of the area. Concept 1 makes strong use of vegetation native to the coastal bluffs, which is a historically appropriate treatment, and has a minimum of hardscape. Altogether, this concept is compatible with the surrounding historic areas. In this, as in all alternatives, lawn should be minimized, consistent with providing comfortable seating areas on the ground for visitors. All options should consider introducing additional Monterey cypress trees to the bluff-top area, in order to complement the existing mature trees and frame the views north from the Main Parade. More information about the secure area around the Crissy Field Center, in this and the other options, should be provided: the height of the perimeter fencing, and how the fencing would be screened.

Alternative 3/2 creates a false sense of history by the overly-generous extension of rectilinear geometry into the top of the new parklands. However, incorporating a more restrained reference to the rectangular footprints of the stables once in the area is entirely appropriate for this and for the other concepts. The tremendous expanse of lawn should be minimized in favor of meadow grasses, assuming that a meadow needs less water than a lawn and can still be used for seating. The horticultural gardens below the bluff may well be compatible to the broader native landscape of the bluffs, but should specialize in flora of the area, both to be compatible with the historic landscape and to better contribute to the educational component of the program. The ratio of hardscape to vegetation is high in this option, and the amphitheaters are an addition to the landscape with no historic precedent and thus need careful attention. Perhaps a softer design, using stepped-down grassy areas could be explored as an alternative to hardscape amphitheaters. The additional buildings on the bluff top should be oriented to reflect the historical location of the stables, and perhaps minimized or combined.

Adjacent to the Crissy Field Center, the location of the additional buildings should be set back from the line of Mason Street and not placed the center of the sight line looking down from Main Post. Having the bathrooms nearly align with the main axis of the parade ground seems especially contrary to good design. There should be a good justification for introducing these two information buildings in the area. Can they not be combined to reduce overall footprint? And when designing the learning landscape, we recommend keeping flexibility in mind, since interpretive themes change over time. Too much investment in hardscape features specific to only one theme may well become obsolete over time.

Alternative 3/3 would be improved, in our opinion, by including less lawn and more native plantings or meadow. The new semi-underground structure may be compelling programmatically, but remains somewhat problematic in terms of compatibility with the National Historic Landmark. Issues that need to be addressed in this regard include having it well hidden in the landscape (and the broader viewshed below) while still affording expansive views, the nature of the roof covering, and, not least, provision of an acceptable interim treatment for the site. Since it remains unclear when, or if, funding would become available to build this structure, this last consideration becomes crucial for realistic and successful implementation.

Sectional views through the proposed semi-underground structure are crucial in order to better understand how visible it will be, as well as a rendering of the structure as seen from Mason Street below. The concept of green roofs and green walls is compelling; however, they take sustained effort to succeed and if they do not, we could end up with an eyesore. It is, after all, more lawn that requires water. That said, there are successful public examples, such as the one at Lincoln Center in New York City, although the urban context there is different than the more park-like Presidio.

Similar concerns about visibility exist regarding the overlooks, which should be designed more as extensions of the bluff topography than cantilevered examples of structural engineering.
While we recognize the need for appropriate small-scale features to provide a rich array of programmatic use by visitors, we question if five amphitheaters are really necessary, and reiterate the previous suggestion to explore softer landscape design that could achieve the same programmatic aim. Similarly, fire pits may seem to provide a traditional national park experience, but are perhaps more appropriate in the less formally-designed and less urban area of the post.

There remains the substantial concern about the cumulative effect of this project, given the amount of change planned for the area north of the Presidio Parkway. The Mason Street Warehouse rehabilitation, refreshing Crissy Field, the uncertain future of the Commissary, and possible retention of the temporary Crissy Field Center all need to be considered. Exactly how all of these efforts are to be coordinated, and how cumulative effects are to be addressed—both for the New Presidio Parklands and during compliance for each of those other undertakings—is a major challenge.

All this said, there is much to like in the proposals, and we applaud the Trust for its robust efforts to ensure widespread public involvement, and for the collaborative nature of the consultation with the National Park Service and the Golden Gate National Parks Conservancy. We look forward to continuing to make the New Presidio Parklands a great success and a model of historic preservation in national parks.

Sincerely,

Christine Lehnertz
General Superintendent

cc: Elaine Jackson-Retondo, Ph.D.
National Historic Landmark Program Coordinator
National Park Service, Pacific West Region
333 Bush Street, Suite 500
San Francisco, CA 94104

Carol Roland-Nawi, Ph.D.
State Historic Preservation Officer
Office of Historic Preservation
Attn: Mr. Mark Beason
1725 23rd St #100
Sacramento, CA 95816

STATE HISTORIC PRESERVATION OFFICER 1

From: Beason, Mark
Sent: Monday, May 04, 2015 3:51 PM
To: Thomson, Robert
Cc: 'Elaine Jackson-Retondo; Stephen Haller
Subject: New Presidio Parklands Project - SHPO ref. # TPT_2014_0904_001

Hi Rob,

After reviewing the information submitted along with the Trust's March 20, 2015 letter, the SHPO offers the following comments.

- The APE appears to be sufficient to take both direct and indirect effects into account.
- In the next set of consultation information, or whenever it is convenient, could you please provide a list of the non-contributors within the APE, or at least within the footprint of the NP3?
- As mentioned in the document entitled "Elements Common to All Alternatives," the Presidio Promenade and De Anza Promenade appear to be named features that will be incorporated into the design, but neither is indicated on the diagrams illustrating the alternatives. Please clarify where these elements will be.
- As a point of curiosity following one of the comments by the public, what is the existing policy regarding outdoor art installations and play structure installations?

3-4 We look forward to continuing consultation on this undertaking.

Mark

Mark A. Beason
State Historian II
Architectural Review and Environmental Compliance
California Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816

NATIONAL PARK SERVICE 3

United States Department of the Interior
NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94123

IN REPLY REFER TO
L76 (GOGA-PL)

JAN 19 2016

The Presidio Trust
Attn: John Pelka
New Presidio Parklands EA
103 Montgomery Street, P.O. Box 29052
San Francisco, CA 94129-0052

Dear Mr. Pelka:

The National Park Service, Golden Gate National Recreation Area (GGNRA) is pleased to have received and reviewed the New Presidio Parklands Environmental Assessment (EA). Our collaboration with you from the early formative stages of the project makes it easy for us to feel a sense of pride and great anticipation in the parklands project as you complete the required environmental compliance. We are eager to work with you and the Golden Gate National Parks Conservancy in the future design stages of the proposed preferred alternative—Alternative 3—and we offer these comments in that spirit.

The following observations and comments are submitted pursuant to the National Environmental Policy Act (NEPA). GGNRA agrees with the Draft Finding of No Significant Impact (FONSI) with regards to NEPA procedures, as presented in the EA. There are several areas in the document where we believe additional analysis, investigation, and monitoring in regards to visitor use, transportation, and natural resources would ensure a more successful project. Furthermore, additional explanation would help the public understand the anticipated project outcomes. The enclosed comments outline these observations. We have every confidence that our comments will be resolved in the final FONSI, the present schematic design phase, and through continued collaborative management of the Crissy Field corridor.

Please note that additional comments may be submitted by the National Park Service as part of the National Historic Preservation Act consultation process, under the Presidio Trust's Programmatic Agreement.

We once again applaud the Presidio Trust on the exemplary planning process underway for the New Presidio Parklands and we look forward to continued collaboration on this important project.

Christine Lehnertz
General Superintendent

cc: Greg Moore
Enclosures (1): NPS/GGNRA Comments on New Presidio Parklands EA

National Park Service, Golden Gate National Recreation Area

Comments on the Environmental Assessment for the New Presidio Parklands Project

January 15, 2016

Water Resources

pg. 39: The statement that "the Trust will implement designs to reduce or eliminate impervious surfaces" appears to conflict with the preferred alternative which adds 5.6 acres of impervious surface relative to the no-action alternative of 1.9 acres. We encourage the Trust to seek additional opportunities to reduce impervious surfaces in schematic design. NPS encourage use of drought tolerant plants in landscaped areas and implementation of irrigation practices that minimize water use. We also encourage careful monitoring of application and operations to minimize the risk of incidental runoff.

Visual Resources

pg. 33: Protection of visual resources on this highly visible site so closely associated with Crissy Field is of special interest to GGNRA. The EA addresses visual resources in several places, but not consistently under a "visual resource" heading. For example, mitigation for fugitive light is under "biological resources", and the utilities section doesn't refer to the potential negative visual impacts of service poles or other equipment. And the visual resources section on pg. 33 only addresses revegetation. The section on Alternative 3 cultural resources (pp. 73-77) could have been strengthened by clear commitment that features in the landscape (overlooks, paths, amphitheater, etc.) would not obstruct views, but be visually subordinate to the larger landscape.

pg. 70: Two additional historic buildings (220, the former Garrison Headquarters and 218, the Fire Station) should be considered part of the Area of Potential Effect as the new parklands are immediately adjacent to these structures and changes in the landscape (parking, new structures, etc.) may impact the setting and viewscapes of these buildings.

We encourage the Trust to plan for preserving visual quality holistically in the schematic design phase. This interest in preserving the historic setting is also an NHPA Section 106 subject further elaborated upon in a separate letter from the NPS.

Transportation

pg. 36, 37: In several places the EA either encourages the NPS or assumes that NPS will implement additional regulations, including paid parking, on Crissy Field in areas such as East Beach, to manage parking demand. At this time, the NPS has no plans to implement paid parking on Crissy Field beyond what is in place currently, and the EA should analyze the transportation and parking impacts assuming there is no paid parking in place.

Signalization of intersections at Level of Service (LOS) E and F: While the goal of deferring signalization until after additional Transportation Demand Management (TDM) measures have been tried is admirable, there should be a specific monitoring and adaptive management plan in

place and a commitment for implementation (when certain thresholds are reached, for example). The NPS has concerns that TDM measures will suffice to improve the LOS for these intersections and that it would be prudent to be prepared for implementation of signals to manage the traffic.

pg. 46: It is unclear why Mason Street/Marine Drive intersection is excluded from the analysis, as well as Crissy Field Avenue and McDowell Avenue (north end), since they will both be affected from changes in traffic flows to the Crissy Field.

NPS agrees with expanding *PresidiGo*, particularly during weekends. Specifically, we encourage increasing frequency to Crissy Field from the Transit Center. With the extension of MUNI 43 to the Transit Center, the use of transit to access Crissy Field could be significantly increased; however, expanded *PresidiGo* is an important component in making that occur.

pg. 49, 2nd paragraph, All Alternatives: It would have been helpful to state the assumptions underlying building uses along Mason Street. It is unclear whether the uses are from the PTMP analysis or another land use plan (i.e. Sports Basement EA). Currently some of these buildings are not occupied, so it would be helpful to clarify what assumptions are made regarding their occupancy.

Likewise, the assumptions around trip generation for open space should be clarified. It seems that the quality and anticipated use of open space under each alternative will be different than the current Crissy Field open space use, given the variety of proposed amenities within the new Presidio Parklands. So a one-for-one calculator may not be directly applicable. The open space trip generation estimating formula could be clarified.

Level of Service Planning Period: The NPS appreciates analyzing multiple peak periods for level of service (weekday, weekend, peak weekend); however, it is not clear what period is used as a performance standard. It appears that mitigation (signals) is being applied during all periods, which suggests that the goal is to have an acceptable LOS during peak hours during peak weekends. Because of its location and the influence of San Francisco commute traffic, we suggest that a more appropriate planning period for the Presidio would be the weekday peak.

pg. 57, Parking: The 1st paragraph states that "Parking utilization will increase with increased occupancy of buildings in these districts", and Table 7 gives the data for supply and current utilization. But current utilization is not for fully projected building occupancy. It is unclear how full occupancy is analyzed as part of the alternatives.

pg. 59, All Alternatives: The statement that "increasing parking supply in key areas to meet demand would minimize the negative effects of motorists circulating in search of available parking" does not seem consistent with Alternative 3 which proposes the least amount (amongst alternatives) of parking on the project site to meet demand. It is not clear how this objective would be achieved.

Natural Resources

pg. 28 and pg. 130, Marsh Expansion: We are concerned that the 2004 PWA Study is used as a rationale for excluding marsh expansion anywhere except the area immediately around the flood shoal (near the east end of the marsh). Although there may be other considerations which conflict with marsh expansion within the New Presidio Parkland project area, the 2004 PWA report should not be used as a rationale for rejecting marsh expansion in this area. While the PWA report recommends that "future expansions to the existing marsh should include enlarging the area near the flood shoal", it is not meant to suggest that expansion in other areas is not recommended. Projects that expand the existing marsh have the potential to add significant ecological benefits to the marsh.

pg. 38, Biological Resources: We recommend the Trust describe additional measures to prevent the spread of pathogens and invasive plants during construction (e.g., cleaning and disinfection of tools, vehicles, boots, etc.).

pg. 96, Coastal Salt Marsh: Note that leopard shark have only been seen in the marsh on a few, rare occasions. Topsmelt (Atherinops affinis) and Pacific staghorn sculpin are also common fish in the marsh. The marsh also supports a variety of crustaceans and benthic invertebrates.

Project Site

pg. 4, second bullet, Crissy Field Center and Youth Campus: We suggest that the description for these uses could be more clearly stated to align with the goal stated on pg. 28 which reads "Reaching these goals requires new educational facilities and outdoor learning environments that fill the entire project site." It seems that if these are specific goals the project is trying to achieve, they should be included in the goals on pg. 4. Furthermore, the goal to expand these facilities to increase program participation is used as a factor for not further studying an expanded marsh. If educational program expansion is a screening factor for alternatives, then it should be analyzed in all of the alternatives. In the same paragraph for this bullet, the use of Building 603 should be identified as the existing Crissy Field Center. The "adjacent construction" is proposed new construction.

3-6

Consistency with Land Use Plans and Policies

pg. 41: Although smaller in scope than the other plans listed in this section, the Sports Basement EA could have been included. It is an upcoming project which relates to physical environmental issues of the New Presidio Parklands proposal. Likewise, the Transportation Impact Analysis section could include the Sports Basement EA analysis in the Intersection Analysis section on pg. 44.

Visitation

NPS has several concerns about the descriptions of how the new parklands will change and affect the existing visitation pattern. This topic is first mentioned on pg. 39 related to special events; with later references on pg. 59 to impacts on transportation, and most thoroughly beginning pg. 61. Impacts associated with a growing youth program could be clearer. And the discussion (pg. 26) about a proposed increase in retail, food service, and restrooms is not detailed (size and location). It would be helpful to clarify if these services are anticipated to be accommodated in the New Observation Post or elsewhere.

pg. 59: Events are proposed to be capped at 1200 persons to ensure that supply meets demand, but it is unclear how the number of persons affects or translates to parking supply given that event participants may arrive at the site by many different modes of transportation. Also, it is unclear if 1200 is the cap per individual event or the cap for multiple events totaled together for one day.

pg. 61: NPS is unaware of analyses that conclude that Crissy Field has more visitors than originally designed to accommodate. Parts of Crissy Field (such as the airfield) are not as heavily visited as other areas, such as the Promenade, but they are very popular. It also seems that the recent increase in visitors, and access issues on the weekend, may be partly attributed to the new building uses and programs hosted in Area B buildings.

pg. 63: Visitation Demand at Crissy Field, 1st sentence: Additional information is needed to explain the statement about Crissy Field visitors re-routing into the new Parklands. When you consider the proposed new programming and features, it is uncertain whether more visitors from Crissy Field would reroute their trip through the Parklands than visitors to the Parklands would discover Crissy Field. Monitoring may be required to understand this dynamic.

pg. 67: Alternative 3, 1st sentence: It's unclear how Alternative 3 would deliver "greater participation by the local and regional population" than the other alternatives. A greater variety of experiences does not necessarily translate into greater participation by locals unless there is targeted outreach, commitment to easy access, etc.

In general, we encourage the Trust to commit to a thorough program of monitoring visitor use at the New Parklands. This could be particularly effective in the early stages when patterns are emerging and management actions may be more easily implemented. Such a program could be integrated with NPS and Parks Conservancy analysis of visitation along the Crissy Field corridor, and development of an adaptive management program.

Crissy Refresh – Cumulative Impacts

pg. 115-116 and in other places: GGNRA and the Parks Conservancy continue to analyze what a "refresh" of the Crissy Field corridor would entail, and have not established a timeline for such a plan. References to the Refresh made in the EA about reuse options for Building 1199 do not reflect the full range of options GGNRA may consider in the future, nor do other descriptions of how the site performs represent the park's analysis. We look forward to collaborating with the Presidio Trust on a plan that would refine the vision for the corridor in light of the New Parklands and other issues that have emerged.

NATIONAL PARK SERVICE 4

United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94123

IN REPLY REFER TO

H4217 (GOGA-CRMM)

OCT 11 2017

Jean Fraser
Executive Director
Presidio Trust
Attn: Rob Thomson
103 Montgomery Street
P.O. Box 29052
San Francisco, CA 94129

Dear Ms. ~~Fraser~~ JEAN:

This letter provides joint comments from the National Park Service (NPS), Golden Gate National Recreation Area and the Pacific West Regional Office, on the July 20, 2017 consultation package and September 15, 2017 consultation meeting for the new Tunnel Tops project under Stipulation IV.C.2.d of the Presidio Trust Programmatic Agreement. Comments from the consultation meeting were summarized by the Presidio Trust in a table entitled 9/15 Consultation Meeting Summary, which was forwarded to the NPS. The table shows previous NPS or SHPO comments and Presidio Trust responses and notes. This letter provides the NPS response to the table. We refer to the table below and have enclosed it as an attachment.

We appreciate the significant effort that has gone into the preparation of this consultation package. The scale and importance of the undertaking warrants careful consideration for the plan for this exceptional site. We support a finding of no adverse effect with conditions, as described below, and look forward to working with you to expeditiously resolve these issues.

Comments on the Consultation Meeting Summary

Elements 1-7: NPS agrees these are resolved.

Element 8: Conditionally resolved, awaiting design revision. The areas adjacent to the Visitor Center (VC) should be further simplified and adopt a more rectilinear pattern to better integrate into the adjacent Main Parade Ground. In other words, expand the more rectilinear zone further into the project area around the VC in a more substantial engagement with the Main Parade Ground grid. The Western Hollow will be quite visible from the northern most room in the Visitor Center (which is largely glass), as well as from the length of the Parade Ground, which gains elevation on the southern end.

Element 9: Resolved.

Element 10: Conditionally resolved. NPS would like to have seen the rehabilitation of Building 201 as part of this consultation since the programmed function was part of the undertaking previously and the building is within the project boundary; however, we are willing to accept as separate consultation if referenced in the Tunnel Top agreement (if there is one) and if the State Historic Preservation Officer and Advisory Council for Historic Preservation agree that this would not constitute a piecemeal approach to the undertaking.

Element 11: Resolved. Reducing the height of the retaining wall by two feet, as described in the sketches submitted to NPS, has reduced the visual impact of the feature to an acceptable level.

Element 12 & 13: Resolved.

Element 14: Conditionally resolved, awaiting design revision. While the distinct loopiness remains in the scheme, modifications requested in Element 8 (above) combined with the plantings that line and screen most paths, the visual impact of this characteristic may be reduced to an acceptable level. This relatively small, partially visible, topographically varied transitional site between the main parade ground and Crissy Field can support a more curvilinear form that is perhaps more naturalistic than the exaggerated geometry currently proposed.

Elements 15-17: Resolved.

Element 18: Conditionally resolved, awaiting design revision from the proponent or the Trust. A set of earlier concepts for the Crissy Field campus (June 3, 2015 meeting package), left the area where Building 602 is currently proposed open. The four schemes included:

- Scheme one – rectangle building placed at an approximately sixty degree angle to Building 603 and partially engaged in the slope of the bluff and the east side of the courtyard was nearly completely open with a short L-shaped retaining wall marking the southeast corner of the courtyard and a covered (no walls) area for outdoor classrooms along the east side of the courtyard.

- Scheme two – similar to the first scheme except that the new building would have a wedge shaped footprint.
- Scheme three – similar to first scheme except the new building is L-shaped and the L-shaped retaining wall is omitted.
- Scheme four – similar to the third scheme, however the L is flipped and the L-shaped retaining wall is reintroduced.

While these proposals needed additional work to make the architectural character of the proposed new building more compatible, one thing that all four schemes had in common was leaving the east side of the courtyard open, which allowed Building 603 to remain in the forefront and did not impact Building 603 to the same degree as the current proposal. Additionally, the "Baseline Concept" for the campus included in the package shows two new buildings that are parallel to Building 603.

Explore rotating building 602 so that it forms the south side of the courtyard, which opens up the east side, or revisit the "Baseline" concept proposed in the June 3, 2015 meeting package. The first approach retains a courtyard and reduces wind, and both approaches reduce the impact to Building 603 and to the archaeological site (AR-30). This possibly could be done without totally rethinking programming.

3-8

Elements 19 & 20: Resolved.

Element 21: Red roofs and a more opaque white paint will resolve.

Element 22: Awaiting redesign, but likely to resolve.

Element 23: Resolved with removal of the "totem" feature from both building and landscape.

Element 24: Conditionally resolved, awaiting design revision. One of the remaining character defining features of the area on the south side of Mason Street is the relatively flat openness north of the bluff and out toward Crissy Field and Crissy Marsh. The Mid Crissy Field Design Guidelines state the following:

- Enhance Mason Street's open streetscape and improve views by maintaining a built setback of at least 70 feet from the south edge of Mason.(p.27)
- Develop a landscape design and approach for the Mid-Crissy area that is compatible with the historic, simple, "open", utilitarian character of the area, and consistent with the Vegetation Management Plan designation of the area as "designed landscape zone." (p.27)

The newly proposed cap for the Land Use Control elevates the finished grade on the south side of Mason Street three feet higher than the finished grade of the roadway, which diminishes the

openness to some degree; however, the cap also protects AR-30, a contributor to the National Historic Landmark District. The diminished openness of Mason Street adjacent to the Learning Landscape is exacerbated by the proposed additional earthen berm on top of the cap, which raises the adjacent finished grade another twelve to eighteen inches, for a height of four to four and one half feet plus the proposed tall grasses and trees.

We suggest reducing the berm as much as possible and exploring reducing the height, or density, of the grasses on top of the berm or some other approach so that the edge does not read as a vegetated wall. The other undulations and forms will not likely read as faux geomorphic in reality as they do in plan.

The nature of structures in the Learning Landscape, amplified by the inadequacy of the Supplemental Design Guidelines in setting useful parameters for their insertion into the busy and highly visible Mason Street corridor also has the distinct potential for adverse effect to the feeling, setting, design, and materiality of the historic district. If the vague representations of play structures shown on Simulation 2 are to be taken literally, they are enormous - two or three times the size of the people walking by - and do not appear "subordinate to existing historic resources" as stated on page 61. The assurance that all new features would be subordinate to Building 603 simply does not allow for too many large features to be inserted into the area.

Elements 25 & 26: Conditionally resolved. NPS feels that the proposed 30-day review of 50% Construction Documents is very late in the design process. NPS proposes engaging with designers earlier, in Design Development, and again at a later review.

Element 27: The cumulative effect analysis needs more depth. For instance, there is no acknowledgement that the rehabilitation of the Mason Street Warehouses (Buildings 1182-1188) is an adverse effect; no consideration is given to the effect of removing the Commissary building entirely; no consideration on the effect of the Presidio Parkway project on the former Post Headquarters (Building 220); and the redesign of Halleck Street and associated move of historic Building 201 was not taken into account.

Element 28: NPS supports this possible outcome.

Next Steps

We look forward to a follow up meeting as is stipulated at IV.C.2.d.(1).(c) of the Presidio Trust Programmatic Agreement to discuss our comments and reach consensus on a finding of no adverse effect with conditions. Key to reaching consensus will be the provision of additional opportunities to review the project to understand how areas of concern outlined in this letter have been addressed.

The Tunnel Tops is an extraordinary project that will deeply enrich the public experience on the Presidio. The general direction of the design treats the area in a manner that is suitable to the spectacular location, and we look forward to working in collaboration with the Trust and other consulting parties to expeditiously resolve the last outstanding issues and make the project a success.

Sincerely,

Cicely Muldoon
Acting General Superintendent

Enclosures: September 15, 2017 Consultation Meeting Summary

cc: Elaine Jackson-Retondo, Ph.D.
Preservation Partnerships Program Manager
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333 Bush Street, Suite 500
San Francisco, CA 94104-2828

Julianne Polanco
State Historic Preservation Officer
Office of Historic Preservation
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1725 23rd St #100
Sacramento, CA 95816

Review of New Presidio Parklands Project Supplemental Design Guidelines Sept 2015

Kristin Baron, Cultural Resources Division, GGNRA, NPS
January 14, 2016

Page Number	Comment	Reviewer
Inside front cover	Please provide photo date and caption for this image. It is unclear whether this photo is a current image or an modified artist rendition of the preferred alternative	
p.2	Rob's 10/28/15 letter to the SHPO calls the project a "14-acre project" but the Introduction refers to the Trust as "developing 13 acres of new parkland". Please adjust discrepancy.	
p. 3	Move the caption for Figure 2 to the lower left-hand side of the image so the design is consistent with the other figure pages.	
p. 4	Para 1: "in anticipation of new construction associated with the expansion of Building 603 to support the CFC". As you are not proposing to directly construct additions to the footprint of bldg. 603, perhaps change the text to "expansion of programs associated with Building 603".	
p. 4	Provide photo date for this image and if room allows, a caption that provides viewer with information about the direction of view.	
p. 6	In Figure 3, Bldg 201 is missing a number label	
p. 8	This photo needs a date and if room allows, a caption that provides viewer with information about the direction of view.	

p. 10	Para 2: "The onset of World War I cut the PPIE short" is inaccurate. The PPIE continued its full operational schedule and closed, as planned, in December 1915. Change the sentence to "After the closure of the PPIE, the city removed the majority of the temporary buildings and the army constructed a large cantonment of……."	
P 10.	Para 3: "due to treacherous flying conditions resulting from the construction of the Golden Gate Bridge and advances…..	
p. 10	Para 4: " largely consisted of military motor pool, storage and warehouse buildings…."	
p. 11	Figure 9; please provide date – **circa 1916**- to this photo.	
p. 21- p 29	Sub-District Design Guidelines; there are numerous instances where the SDG are discretionary and not prescriptive about the treatments of key character-defining features. In order to make it clear that the guidelines are mandatory, please replace "should" with "will" in the following places: Mid-Crissy Sub District p. 21: "new construction associated with Bldg 603 **will** favor permeable and open façade" p 23 "new deck, ramp or access features **will** not obscure historic relationship .." p 23 "New construction **must** use materials from the following list" Main Post Sub District P 27 "New construction **must** be sited to the north of existing buildings…" "New construction **must** be set back from the bluff edge to avoid…"	

	P 29 "New construction **must** use materials from the following list:	
P 23	3rd column, 2nd bullet: "Design new construction that is temporary in nature or can be easily repaired or replaced in the event of damage due to flooding" Please elaborate or spell out more clearly how new construction will be "temporary in nature" while also being architecturally compatible within Crissy Field.	
P 24	3rd column, 2nd bullet: "Green roofs are permitted…." Please clarify this text as we are assuming that by "green", you mean "living". Please make distinction so that it is clear that you are not suggesting green asphalt tab roof tiles on Crissy Field.	
P 24.	3rd columns, last bullet: On pg 23 the design guidelines suggest to consider the appearance of bldg roofs from Main Post Bluff to hide mechanical systems and other unattractive features located on rooftops. Pg 24 says that photovoltaic arrays may be incorporated into the new construction associated with Bldg 603. Wouldn't the photo panels on the new bldgs adjacent to 603 be visible from the Main Post bluffs? Please address this discrepancy.	
P 27	Average height discussion: Consider adding language that offers an estimation or possible cap on the number of "minor building elements" so that we can all expect only a reasonable number of these taller elements.	
P 28	Bullet 2 "Breaking new buildings into smaller volumes in order to disperse their mass…" needs clarification or better wording. This guideline could be misconstrued as the permission to build more, smaller buildings which would risk "littering" this sub district.	
P 29	"Green roof" language; please see comment on p. 24.	
P 30	Provide photo date for Figure 25 & 26. In Figure 26 caption, please add, "The Transit center, constructed in 2004, is an example….."	

P 31	Avoid vernacular speak. “Trust historic compliance staff determined that a full ~~blown~~ or unabbreviated HSR was not warranted….”	
P 32	Para 2: Editing inaccurate sentences: “ The army removed many of the site’s utilitarian structures in preparation for the City of San Francisco’s 1915 Panama-Pacific International Exposition. After the PPIE’s closure in December 1915, and with America’s preparation for a possible involvement in the European War, ~~However with the onset of World War I~~, the army quickly replaced the elaborate temporary city……	
P 32	Para 2: “The landscape was further altered in 1936, with the completion of Doyle Drive to support the new Golden Gate Bridge.”	
P 32	Para 3: “The site changed again ~~with a flurry of construction in the run up to World War II~~ as the army constructed several buildings as part of the premobilization effort before WWII. By ~~War’s end~~ 1945 the Mid-Crissy area consisted of…..	
P 33	Para 1: minimal ~~Spanish Colonial Revival~~ Mission Revival features. Please see the NPS July 2015 comments from the Bldg 99 HSR: There needs to be a consistent agreement and use of the two architectural styles “Mission Revival” and “Spanish Colonial Revival.” At GGNRA, we identify the early, pre-1930s army stucco buildings (San Francisco Port of Embarkation, circa 1912; Fort Winfield Scott, circa 1917 & the earliest buildings constructed in relation to the development of Crissy Field, circa 1920s) as Mission Revival. They are the very simple, unadorned white stucco buildings with red roof tiles where the only decoration is the shadow play between the deep and arched fenestration pattern. During the 1930s, especially at the Presidio, this style became more “stylized”, if you will, into the more adorned, thickly-plastered and almost Baroque Spanish Colonial Revival.	

P 36	Reconcile the publish dates for the Presidio Physical History Reports. Page 33 says 1995; page 36 says 1993.	

STATE HISTORIC PRESERVATION OFFICER 2

STATE OF CALIFORNIA – THE NATURAL RESOURCES AGENCY EDMUND G. BROWN, JR., *Governor*

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February 18, 2016

Rob Thomson
Acting Federal Preservation Officer
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RE: New Presidio Parklands Project, Preliminary Finding of Effect and Supplemental Design Guidelines, Presidio of San Francisco National Historic Landmark District

Dear Mr. Thomson:

This letter conveys the State Historic Preservation Officer's (SHPO's) comments on the Preliminary Finding of Effect and Supplemental Design Guidelines for the New Presidio Parklands Project at the Presidio of San Francisco.

The Presidio Trust finds that the proposed New Presidio Parklands Project will not adversely affect the National Historic Landmark District or any of the individual resources directly or indirectly, and that it will not cause cumulative adverse effects.

3-12

Undertaking components:

- Demolish non-contributing Building 211;
- Construct a new building of equal size (~9,300 square feet) near the location of 211;
- Rehabilitate and expand contributing Building 603;
- Construct two new classroom buildings totaling less than 7,500 square feet and no single building exceeding 5,800 square feet;
- Add new landscape elements, including
  - Zocalo
  - Anza Esplanade
  - Learning Landscape
  - Bluff Walk
  - Other circulation features

Please note that the SHPO agrees with the comments offered by the National Park Service (NPS) in a January 19, 2016, letter. Specifically, the SHPO cannot concur with the proposed finding of No Adverse Effect and that the undertaking will not cause cumulative adverse effects at this time. This letter will avoid duplication of the points made by NPS, but some may bear repeating. Comments on the Preliminary Finding of Effect follow in Attachment 1, and comments on the Supplementary Design Guidelines are in Attachment 2.

I look forward to continuing consultation regarding this important project at the Presidio of San Francisco. If you have any questions regarding these comments, please contact Mark Beason, State Historian, at (916) 445-7047 or mark.beason@parks.ca.gov.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

Electronic CC:
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General Superintendent
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Preliminary Finding of Effect, October 2015

Page	Comments
3	Please correct the statement regarding the APE to say that the SHPO offered comments regarding the sufficiency of the APE in an email dated May 5, 2015.
5	Figure B. Consider including the Palace of Fine Arts in the APE.
5	Figure C and Page 36. Explain why the reinstallation of Building 201 and associated landscaping is not being considered part of this undertaking.
10	First and second bullets will require revisions to reflect when the consultation meeting actually happens and concurrence on assessment of effect occurs.
11	Recommend separating the elements of the undertaking for the New Presidio Parklands Project from the elements that will remain tied to the Doyle Drive EIR. The description of the current undertaking should reference the Doyle Drive action, but should clearly define where that undertaking ends and the Parklands undertaking begins. This will establish a baseline for assessing effects caused by the Parklands project and avoid the confusion that may result from mixing references to both together in the EA and 106 documents. This is also part of the issue addressed by the SHPO's comments regarding amending the Doyle Drive PA and the PTPA. The actual portion of the undertaking being transferred from FHWA/Caltrans to the Trust must be clearly defined. Elements common to all alternatives may require updates depending on the resolution of the agreement document negotiations.
11	Provide the locations and depths of the permanent drainage features described in the 5th bullet point, and describe the archaeological sensitivity in these areas.
12	Provide reason(s) why Alternative 2 was not chosen.
13	How many linear feet of concrete walls will be constructed at the three overlooks described under the preferred alternative? What will be the dimensions and locations of these walls? There are several concerns with the appropriateness of the new plaza (Zocalo), with its circular elements, lack of clear description of the size, lack of information about what historic landscape elements (besides the trees) that are present and will remain. Also, renderings of this area should do a better job of indicating the scale of design elements.
14	The Terraced Amphitheater seems out of scale and obvious as a new element that does not exist presently in the NHLD. Its articulation needs some refinement or better description. The bluff walks from the embankment to Mason Street seem too wide, large, and inconsistent with pathways for strolling. The Learning Landscape, Field Station, and Classroom buildings need further articulation in order to understand the effects. They should be scaled to Building 603 and not the new bluff.

	Viewsheds from Crissy Field should be considered in assessing effects. If buildings are to be "scattered," they should mimic a previous building siting vocabulary and be regimented and orderly. If the fact that buildings occupied this site previously is to be used as the reason why more buildings are allowable, then the previous building organization should guide the design and planning, too.
26 – 31	It appears that Halleck Street and Lincoln Boulevard should be included in the list of contributing resources within the APE. Halleck Street and Lincoln Boulevard are included in the non-contributors list, but both are called contributors on page 62. Halleck Street seems to be directly affected by the undertaking. Effects to Lincoln Boulevard are unclear. Mason Street seems to be another prominent contributor that should be taken into account and included in the document. Re-check the list of non-contributors that starts on page 30 for accuracy.
33	The historic landscape is missing from the discussion of contributing resources within the APE with the potential to be directly affected. It should be considered equally with the built environment and archaeological resources as an important part of the NHLD.
37 – 38	Explain how the Trust is taking effects to Building 222 into account.
40	Under Format for Assessing Effects, the document states that Alternative 2 responds to the Doyle Drive BETP, etc. It seems that this should refer to Alternative 3, the preferred alternative.
42 – 51	A photo-simulation of the proposed modifications around Building 603 would be very useful.
47	Simulation 2. The new elements in the landscape, including the amphitheater, paths, play structure, and poles sticking up are out of scale and too large for the setting. More information is required to assess potential effects on the NHLD.
50	Simulation 5. The Zocalo appears from this view and without the benefit of the context of surrounding buildings to be too natural looking and inappropriate for the foot of a previous military post.
53 – 54	Please demonstrate which historic connections exist between the upper and lower post along Halleck and Bank Streets, and how they are they being "preserved." The term "historic connections" is unclear. Clarify if it refers to those specific roads and their contributing status. Clarify if Halleck Street will remain historic (presuming it is) following reconstruction. Bank Street's status is unclear, as it has been omitted from the resources lists earlier in the document. Clarify the scale of expansion being considered for Building 603. Because this is being included in the Parklands undertaking, the parameters need to be clearly stated. It is not clear

	in this section if "additions to Building 603" refers to the expansion of the building itself or the construction of the two new classroom buildings south of 603.
54	With regard to the building replacing Building 211, it is difficult to agree that a 9,300 square foot building is "inconspicuous" or complies with the first bullet under Main Post Planning and Design Guidelines.
55	It is difficult to agree that adding a 9,300 square foot building emphasizes the openness of the area. Regarding bullet 3, clarify if the Presidio Promenade is the same feature as the proposed Bluff Walk. Clarify the criteria for areas designed for informal play and gathering. The children's playground described in the 5th bullet sounds more formal what the guideline intends. While it is good that views of parked cars from Crissy Field will be "minimized" by topography and vegetation, the guideline states that the Trust will ensure that parked cars "cannot be seen from Crissy Field," which is a stronger statement than minimizing their visibility.
56	The guidelines state that the Trust will evoke the form of the historic bluff. However, this undertaking intends to evoke the "character of a natural bluff face." Clarify what the form of the historic bluff was and how the new planned bluff will evoke its form. Please note that "positively addressing" the applicable design criteria in these planning documents is not the same as fully complying with the applicable design criteria.
57	Clarify the ground disturbance expected from the construction of the New Observation Post. Clarify the grade change between the proposed location of the new building and Buildings 210 and 215. Clarify if the new building will be visible from Crissy Field. Clarify how the existing parking area will change. Provide the actual size of the existing Building 211. Its approximate size is given as 9,300 square feet. The guidelines of the new Building 211 need further and fuller definition. Using average height related to sea level is confusing. The SHPO recommends associating the height to existing historic buildings nearby.
58	Construction of the New Observation Post should be the subject of ongoing consultation and design review. Provide the detailed size constraints on the expansion proposed for Building 603.

3-14

58 – 59	The height comparison for new construction should be with Building 603 and not the new bluff. The guidelines fail to reference the design of the structures, their materials, and other details. The Secretary's Standards should apply to all work to Building 603, not just the interior. Visibility analysis should include views from Crissy Field.
59	The document states that the largest new building will not exceed 5,800 square feet, which is half the size of Building 603. Provide the current area of Building 603's footprint, as this would be a more reasonable point of reference for new construction. The document states that the total of new construction near Building 603 will not exceed 7,500 square feet. Please provide the analysis that supports that number. The document states that the total of new construction in the Crissy Field portion of the project site will not exceed 10,000 square feet. Please provide the analysis that supports that number. Also, provide details for other new construction being considered in that area. Provide details for flood control measures being considered. Provide details for expected ground disturbance from the entire portion of work in the area of Building 603. The rehabilitation of Building 603, construction of two new classrooms, and other modifications in this location should be the subject of ongoing consultation and design review.
61	Provide details regarding new hardscape features being considered in the location of the Zocalo. The information provided is not sufficient to assess effects (see previous comments). The area needs to be treated differently than an overlook in one of the more "rural" areas of the Presidio or the bluff itself because it is at the foot of the Main Post. Compatibility of new construction in this area with the historic vocabulary of the Main Post and Building 210 will be crucial to assessing effects.
62	According to the document, segments of Halleck Street and Lincoln Boulevard will be altered as part of this undertaking. Specify which alterations will occur as part of the Parklands project. This is another example of the clarity and separation needed between the Doyle Drive undertaking and the Parklands undertaking. If adverse effects to these contributors to the NHLD will occur as part of this undertaking, then they must be resolved and the preliminary finding of No Adverse Effect will not be accurate. Indirect effects on these two roads should be taken into account.
63 – 65	If testing or monitoring during construction identified archaeological features, the Trust's plan

	needs to include notification and consultation with NPS and the SHPO. The Archaeological Monitoring Plan should be part of this consultation and submitted to the SHPO and NPS for comments. Existing plans for ground disturbance and any modifications during design development should be part of ongoing consultation with NPS and the SHPO for the Quartermaster Complex, Quartermaster Dump, and Stream Ravine Dump. The Archaeological Monitoring Plan should be shared with NPS and SHPO for comments.
65 – 67	At this point, the SHPO is unable to concur that there will be no cumulative adverse effects to the NHLD. Taking several current and future projects (Parklands, Building 201, Mason Street Warehouses, Building 610, Quartermaster Reach, Crissy Refresh, etc.) into account will be a challenge based upon the information submitted so far.

Draft Final Supplemental Design Guidelines, October 2015

General comment: The language in these guidelines is excessively permissive rather than assertive. This may have the effect of rendering the guidelines ineffective.

Page	Comment
2	Provide the reason that rehabilitation of Building 210 is not being included in the New Presidio Parklands Project.
3	In the cross section at the bottom of the page, please clarify if Building 211 as shown represents the existing building or the proposed replacement.
7	Halleck Street and Lincoln Boulevard should be included in the list of contributing resources.
21	Treatments should be compatible with the NHLD landscape, but landscape analysis seems to be absent from these guidelines. Any new construction should follow the rectilinear and regularized military development pattern used by the Army at the Presidio. This should be taken into account here as it was for the Letterman Hospital project. Provide the limits for new construction heights near Building 603 and if the height allowed by these guidelines be visible from the Main Post. Provide the square footage allowance for new buildings and clarify if they will be connected to Building 603. Excluding "structures" from the square footage restrictions in the design guidelines leaves an opening for an enormous amount of new construction of non-conditioned spaces. This should be capped as well, ideally at a small number of square feet. Please clarify if these guidelines are recommending only single-story buildings. The guidelines recommend breaking new buildings into smaller volumes. Clarify if there is a limit to the number of new buildings allowed under these guidelines in the Mid-Crissy sub-district. 10,000 square feet of new buildings and an unlimited amount of structures would likely constitute an adverse effect. Please clarify how unwanted use of new structures will occur if the new structures are open on the sides. Clarify what "additions to the horizontal ground plane" means. Clarify which point in Crissy Field's development and history (and Period of Significance) the new construction will "respect." The setting and architectural forms at Crissy Field have changed drastically over time.

22	Building heights should not exceed one story and should be aligned and compatible with Building 603 rather than the bluff itself. Clarify what new construction is proposed for the New Construction Zone at the west end of the Learning Landscape, as represented in Figure 20. Points A and B are reversed between the large figure and the smaller one. They should be consistent.
23	New decks, ramps, or access features should also not obscure the east or south sides of the building. "Concentrate new deck elements, as needed, on the south side of the building …" New deck elements are not recommended and are not necessary to rehabilitate the building. The highest point of new construction should be lower than Building 603, rather than lower than the top bluff elevation. The view from the bluff is not the only concern. Street visibility, roof planes, etc., could also cause effects, both adverse and cumulative. Wind turbines should not be recommended for this location. Compatibility of PV arrays, green roofs, or other sustainable features should be carefully considered and the subject of ongoing consultation. Please clarify if raising the grade near Building 603 is being considered. The four bullet points regarding future sea level rise and flooding are at odds with each other. Constructing flood control measures and raising the grade are not temporary measures and are not features that would allow for periodic flooding of the site.
25	Make sure Figure 21 has the dotted line mentioned in the caption. It is missing in one of the versions we have reviewed.
27	Treatments should be compatible with the NHLD landscape, but landscape analysis seems to be absent from these guidelines. Any new construction should follow the rectilinear and regularized military development pattern used by the Army at the Presidio. This should be taken into account here as it was for the Letterman Hospital project. Spatial Organization and Land Patterns – North and South views are also important and should not be obstructed by new construction. The highest point of the new building proposed to replace Building 211 should be lower than the top of Buildings 210 and 215. As stated earlier, the design of this building should be the subject of ongoing consultation. "New construction should relate to the overall scale and massing of existing buildings …"

3-16

	Use of "should" here and throughout the document is too permissive. Use of "relate" is vague. The scale of new buildings and possible roof variations must be compatible with the Main Post. Clarify why using new buildings or landscape features is being recommended as screening for the area between Building 220 and Graham Street. Removal of Building 211 is not a sustainable or green measure.
28	Excluding non-conditioned, unenclosed space from the square footage restrictions in the design guidelines leaves an opening for an enormous amount of new construction of non-conditioned spaces. This should be capped as well, ideally at a small number of square feet. Points A and B are reversed between the large figure and the smaller one. They should be consistent. The height limit for new construction and average height limit are too vague and should be the topic of further consultation to avoid recommending new construction that would adversely affect the NHLD.
29	The SHPO recommends revisiting the Letterman Hospital compliance regarding building materials and the color palette for guidance. Analysis of these features for new construction and additions occurred during that planning effort. At the very least, the details in the supplemental guidelines should agree with those from the Letterman consultation. Clarify and/or confirm if the guidelines will require that full brick be used or if a variety of brick products will be allowed, such as half brick or faux brick. Some Composition board materials may look and weather differently from natural or historically-used materials and should be carefully considered before selecting them. Metal roofing and trim may be allowed on service or shed roofs on small buildings and tertiary facades, but should not be used on primary elevations or on larger buildings.
31	The SHPO recommends preparation of a Historic Structures Report for Building 603. Please double-check the date of the rehabilitation of Building 603 as 2001 seems too early for when the Crissy Field Center moved into the building.
40	This page lists the Character Defining Features of Building 603. However, none of the features listed under "Less Sensitive" are historic or character-defining features and should be included under a different heading, such as later additions or non-historic modifications. The SHPO supports and recommends the removal of the glazed loading dock addition and restoration of the north elevation of the building.

STATE HISTORIC PRESERVATION OFFICER 3

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May 5, 2016

Mr. Rob Thomson
Acting Federal Preservation Officer
The Presidio Trust
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San Francisco, CA 94129-0052

RE: Tunnel Tops Project (formerly known as New Presidio Parklands Project), Presidio of San Francisco National Historic Landmark District

Dear Mr. Thomson:

The State Historic Preservation Officer (SHPO) received the March 15, 2016, letter from the Presidio Trust (Trust) that contained responses to comments supplied by the SHPO and National Park Service (NPS) regarding the Preliminary Finding of Effect and Supplemental Design Guidelines for the Tunnel Tops Project.

The Trust proposes to negotiate a Letter of Intent (LOI) with Caltrans to articulate the terms of transferring responsibility for the landscape on the Tunnel Tops from FHWA to the Trust. If successful, the Trust and Caltrans would then request that the Federal Highways Administration (FHWA) incorporate the transfer through a provision in the Doyle Drive Programmatic Agreement (PA) as a "minor change to the undertaking." The Trust would also update its NEPA Finding of No Significant Impact (FONSI) to incorporate conditions for the project.

In previous correspondence, the SHPO articulated a position regarding transfer of the Tunnel Tops landscape from FHWA and the Doyle Drive PA to the Trust. This letter repeats and clarifies that position.

- FHWA is the responsible federal agency for the Doyle Drive PA. Any proposals regarding modifications to the undertaking or the PA should be initiated and transmitted to the consulting parties by FHWA.

- The SHPO does not consider the transfer of responsibility for the Tunnel Top landscape from FHWA to the Trust to be a "minor change" to the Doyle Drive undertaking. The method proposed by the Trust to transfer responsibility, is therefore not acceptable, as it would not comply with the Doyle Drive PA.

- Furthermore, neither the proposed LOI nor the NEPA FONSI is a Section 106 document. In order to satisfy the federal agencies' Section 106 responsibilities, the transfer should occur within the Section 106 framework. Responsibility for the Tunnel Tops should likewise be accepted through a Section 106 mechanism, which is why the SHPO recommended Presidio Trust Programmatic Agreement (PTPA). Another mechanism, such as a project-specific agreement document could also be considered.

- Most importantly, the process of transferring responsibility should avoid confusing the public, which currently expects the Tunnel Tops to be treated in accordance with the Doyle Drive PA.

Finally, the SHPO continues to recommend that the consultation regarding the treatment of the tunnel tops that is currently within the Doyle Drive PA is separate to the consultation from what the Trust is conducting regarding their larger Tunnel Top project. As such, consultation and correspondence should remain separate until such time as they are possibly folded into a single action.

If you have any questions, please contact Mark Beason, State Historian, at (916) 445-7047 or mark.beason@parks.ca.gov.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

CC:
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3-18

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January 4, 2017

In reply, reference to: TPT_2014_0904_001

Mr. Rob Thomson
Federal Preservation Officer
The Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

RE: Tunnel Tops Project, Presidio of San Francisco National Historic Landmark District

Dear Mr. Thomson:

With this letter, the California State Historic Preservation Officer (SHPO) is responding to correspondence from the Presidio Trust (Trust) dated October 27, 2016, and continuing consultation with regard to the proposed undertaking at the Presidio of San Francisco. The Trust is consulting with the SHPO in order to comply with Section 106 of the National Historic Preservation Act of 1966 (54 U.S.C. § 306108), as amended, and its implementing regulations at 36 CFR Part 800. Along with the letter, the Trust provided a link to electronic documents to support the consultation. These include:

- A plan drawing illustrating the handover condition of the landscape when FHWA completes soil replacement and grading work;
- A plan drawing showing how each of the Doyle Drive Historic Preservation Criteria will be applied to the Tunnel Tops area during the Trust's undertaking;
- Design documents and renderings for the proposed Learning Landscape area near the Crissy Field Center / Building 603.

The Trust anticipates sharing plans for tenant improvements to Building 603 and the new Observation Post and Transit Center in future consultation submittals.

In the October 27 letter, the Trust requested a consultation meeting to discuss responses to comments and supplemental design material provided in the March 15 consultation package. The Trust's goal for the meeting is to resolve outstanding issues, reach consensus on a determination of No Adverse Effect, and conclude consultation on the undertaking. This request for a meeting was recently repeated in a letter dated December 22, 2016.

On November 8, 2016, SHPO staff emailed to inform you of the need for more time to conduct an internal review of the Trust's submission and the related and recently proposed amendment to the Federal Highway Administration (FHWA) programmatic agreement (PA) for the Doyle Drive project. As communicated in subsequent emails (November 9 and December 2), this review is ongoing. While a consultation meeting among the Trust, NPS, ACHP, and SHPO is fine, it would be more productive after the issues with the proposed amendment to the Doyle Drive PA are clarified and resolved.

If you have any questions, please contact Mark Beason, State Historian, at (916) 445-7047 or mark.beason@parks.ca.gov.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

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STATE HISTORIC PRESERVATION OFFICER 5

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March 27, 2017

In reply, reference to: TPT_2014_0904_001

Rob Thomson
Federal Preservation Officer
The Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

RE: Tunnel Tops Project, Presidio of San Francisco National Historic Landmark District

Dear Mr. Thomson:

3-20

The State Historic Preservation Officer (SHPO) appreciates the constructive meeting among the Presidio Trust, National Park Service, and Advisory Council on Historic Preservation on March 7, 2017. In accordance with the proposals in that meeting to continue consultation on this undertaking, the SHPO transmits the attached document. It contains the SHPO's responses to the comment matrix supplied by the Trust in March 2016.

As you will see in the comments, the SHPO remains concerned about the potential for adverse effects to the National Historic Landmark District and Crissy Field presented by aspects of the proposed Tunnel Tops project design. These include the introduction of new visual elements at the north end of the Main Post (Zocalo, new Building 211); pathways, walls, and overlooks; amphitheater; learning landscape for the Crissy Field Center; new buildings proposed south of Building 603; and the rehabilitation plans for Building 603. As discussed in the March 7 meeting, the Trust has revised plans for much of the project since the last consultation meetings and will provide an updated and thorough description of the undertaking and updated renderings so the consulting parties can better understand the current state of the proposal. The consultation will continue upon the Trust's submission of this information.

The SHPO submits the following comments and questions regarding the Tunnel Tops Archaeological Management Assessment (AMA) dated June 2015.

- Please provide better graphics or mapping that shows the three areas identified as potentially archaeologically sensitive in relationship to the proposed possible project elements such that effects might be better understood. Please also provide mapping such as overlays that geo-reference historic maps to modern features so that the interpretation of these features' associations is clearly understood by the cold reader.

- The AMA states that archaeological monitoring will be performed in sensitive areas and, if deposits are encountered, they will be documented and efforts made at avoidance and preservation in place. Please explain what data sets would be required to be present such that each feature might contain important information (NRHP Criterion D) and thus warrant such avoidance and preservation efforts. For example, the context mentions a weighbridge at the Quartermaster Complex. What physical remains might be present at that location that would be evidence of the former weighbridge and how might those physical remains help us understand its use and role within the Complex?

- Preservation in place is identified as a management tool. Please provide details on how such preservation will occur, specifically management controls that the Presidio Trust will employ to make sure archaeological deposits are identified, protected, and not inadvertently affected during construction and long term management of the area.

- At the Quartermaster Dump, pages 12-13 of the AMA discuss how design should be completed to avoid affecting potential information-bearing deposits. Please explain how the Trust will follow through to ensure the design does in fact avoid these potential deposits and provisions for SHPO review of final decisions so as to ensure effects are less than adverse. Likewise for the Stream Ravine Dump; if project plans change, how will NPS perform additional consultation with SHPO?

If you have any questions, please contact Mark Beason, State Historian, at (916) 445-7047 or mark.beason@parks.ca.gov.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

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Presidio Trust Responses to SHPO, NPS Comments on the Third Consultation Package, Tunnel Tops Project (October 2015), SHPO Comments March 27, 2017

	February 2016 SHPO Comments on the Preliminary Finding of Effect, October 2015		SHPO response to PT response to SHPO comments
Page	Comments	PT Response to Comments	
3	Please correct the statement regarding the APE to say that the SHPO offered comments regarding the sufficiency of the APE in an email dated May 5, 2015.	The statement will be revised in the Final FOE to read that the SHPO's office indicated on May 5 that "the APE appears to be sufficient to take both direct and indirect effects into account." The Trust would like to request formal concurrence from the SHPO on the APE as defined in its March 20, 2015 consultation package.	According to 36 CFR 800.4(a)(1), it is not the SHPO's role to concur with the APE as designated by the federal agency. The SHPO offers comments on the APE in consultation with the federal agency.
5	Figure B. Consider including the Palace of Fine Arts in the APE.	Due to grade changes and the new Presidio Parkway on-ramp, the project site is not visible from any point on the Palace of Fine Arts' property. Accordingly, the Trust will leave the APE as described in the FOE.	
5	Figure C and Page 36. Explain why the reinstallation of Building 201 and associated landscaping is not being considered part of this undertaking.	The temporary relocation, storage, replacement and rehabilitation of building 201 and site on its east, north and south remain part of the Doyle Drive undertaking. The new paved area on the west elevation is part of the Tunnel Tops project; it replaces the paved vehicular loading area that formerly existed on the west elevation (at the now non-existent lower level) of 201. The new paved area retains the hardscape (as opposed to landscape) character of this area, while adapting it to pedestrian use rather than vehicular.	Language in assessment of effects needs to be more precise on this point. The sentence on page 36 does not provide sufficient details to assess effects. How is the new paved area west of Building 201 different from the Doyle Drive plan for reinstalling the building?
10	First and second bullets will require revisions to reflect when the consultation meeting actually happens and concurrence on assessment of effect occurs.	Agreed; Trust will update in the final version.	SHPO will re-review when the revised assessment of effects is submitted.
11	Recommend separating the elements of the undertaking for the New Presidio Parklands Project from the elements that will remain tied to the Doyle Drive EIR. The description of the current undertaking should reference the Doyle Drive action, but should clearly define where that undertaking ends and the Parklands undertaking begins. This will establish a baseline for assessing effects caused by the Parklands project and avoid the confusion that may result from mixing references to both together in the EA and 106 documents. This is also part of the issue addressed by the SHPO's comments regarding amending the Doyle Drive PA and the PTPA. The actual portion of the undertaking being transferred from FHWA/Caltrans to the Trust must be clearly defined. Elements common to all alternatives may require	This list is meant to articulate the design criteria from the Doyle Drive project that will be carried out by the Trust's Tunnel Tops project. The items listed here include the design criteria that would be transferred from FHWA/Caltrans to the Trust, but it could be clearer which items are part of the Trust vs. DD undertaking. The Trust has provided a summary of the elements the Doyle Drive project will have completed prior to the Trust's project beginning in the cover letter to this package. Agreed, pending further discussion.	The SHPO's comment aims to get the Trust to provide a clear definition of the undertaking (under heading 1.3 on page 11). The Trust agreed to do this in the March 7, 2017, meeting. Including portions of the Doyle Drive undertaking in the Trust's Tunnel Tops undertaking description confuses the reader. The information in the Trust's March 15, 2016, letter does not provide the necessary clarification, but references the design criteria again. The design criteria are relevant in how the Trust will meet the responsibilities transferred from FHWA and the Doyle Drive PA, but they do not define the undertaking.

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	updates depending on the resolution of the agreement document negotiations.		
11	Provide the locations and depths of the permanent drainage features described in the 5th bullet point, and describe the archaeological sensitivity in these areas.	This is a Doyle Drive scope item that has already been built.	This is a good example of a Doyle Drive scope of work item that should not be included in the Tunnel Tops undertaking description. The public and Consulting Parties need to know which is which to properly understand the Trust's assessment of effects. The Preliminary FOE should make this clear.
12	Provide reason(s) why Alternative 2 was not chosen.	Alternative 3 better satisfies the Tunnel Top project's project goals, as articulated in the Notice of Intent (provided as part of the second consultation package), and elaborated upon in the EA's purpose and need, than Alternative 2. Specifically, the preferred alternative includes new classroom, program and outdoor education space for the Crissy Field Center youth programs, enhanced landscape, circulation and view features, and a new Observation Post facility that does not impede historic views from the Main Post northwards.	However, Alternative 2 better avoids the introduction of potentially intrusive new elements into the NHL District.
13	How many linear feet of concrete walls will be constructed at the three overlooks described under the preferred alternative? What will be the dimensions and locations of these walls? There are several concerns with the	The linear feet of concrete walls at each of the three overlooks is as follows (see Exhibit B for detailed sections of the overlooks): East Overlook: 187 LF Central Overlook: 178 LF West Overlook: 200 LF The inside face of the walls at each overlook are 2'. In some locations a code-required railing will extend the height to 42". The dimensions of the outside face of the walls are as follows: Western Overlook: 6' to 8' Central: 3 ½' to 4 ½' (inclusive of built-in seat) Eastern Overlook: 4' to 6' In each location, the plantings at the base of each overlook will consist of shrubs that will screen all or most of the outside face of the walls. The Zocalo feature is delineated in the attached Exhibit A. It consists of	The drawings seem to indicate that some of these walls will be orange. If that is accurate, the walls will be more conspicuous and not compatible with the natural landscape. Low walls in the landscape may not cause adverse effects, but the "outside faces" of the walls are not low and may not be compatible. The SHPO is concerned about the potential for adverse effects from these features. Confirm that plantings will sufficiently camouflage the long expanses of concrete to avoid an overbearing (and visible) new linear element in the landscaping. Consider ways to further treat the concrete (including finish and/or ways to visibly break up the lengths) to ensure these new features disappear into the landscape as much as possible (and help reduce any cumulative impact from new visible features within the project).

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	appropriateness of the new plaza (Zocalo), with its circular elements, lack of clear description of the size, lack of information about what historic landscape elements (besides the trees) that are present and will remain. Also, renderings of this area should do a better job of indicating the scale of design elements.	approximately 90,000 sq/ft, or 2 acres (14% of the 14 acre site), inclusive of the three buildings (210, 211, 215). Within the Zocalo, the only historic elements are the trees and building 210 itself. It is otherwise presently comprised of non-historic parking lots, sidewalks and landscaping dating to the construction of building 215 (2005). The scale of design elements can be discerned in plan in the attached Exhibit A.	The SHPO's concerns regarding the design of this area remain and will require further discussion as the consultation proceeds. The Trust will be providing an updated description and renderings for the proposed design in this location as it has changed since the last consultation correspondence.
14	The Terraced Amphitheater seems out of scale and obvious as a new element that does not exist presently in the NHLD. Its articulation needs some refinement or better description. The bluff walks from the embankment to Mason Street seem too wide, large, and inconsistent with pathways for strolling. The Learning Landscape, Field Station, and Classroom buildings need further articulation in order to understand the effects. They should be scaled to Building 603 and not the new bluff. Viewsheds from Crissy Field should be considered in assessing effects. If buildings are to be "scattered," they should mimic a previous building siting vocabulary and be regimented and orderly. If the fact that buildings occupied this site previously is to be used as the reason why more buildings are allowable, then the previous building	See enclosed Exhibit C for refined sketch of the planted seating element and enclosed example images that describe the desired character. The intent of the element is principally as a landscape feature, the eastern edge of which will blend into the planted bluff face. The hardscape elements will be designed for minimal reflectivity/visual prominence on this new landscape feature. The design approach for the walks in this project is to incorporate multiple uses (walking bikes, ADA, pedestrian) into a fewer number of paths in order to maximize the landscape character of the site, while also minimizing conflicts to enhance safety. The Trust respectfully disagrees with the comment about the path being too wide; for comparison purposes, the dimension of the embankment path is 12' wide, whereas the Crissy Field Promenade is 22'. See enclosed Exhibits D and E for additional information on the Learning Landscape, Field Station and Classroom buildings. The intent of the Guidelines was to scale any new construction to both the bluff and building 603 (see section drawing on p. 23 of the Guidelines). The purpose of scaling them to the existing building is to ensure that the new buildings are subordinate to 603; the purpose of scaling them to the new bluff is to minimize their visibility from the Main Post. The site around building 603 was historically populated by single story gable roofed, wood frame warehouses that were for the most part larger than building 603 (similar to the extant Mason Street Warehouses). This character very much informs the design guidelines and the current proposal for two new buildings	As presented, the amphitheater is a conspicuous new introduction to the NHLD and does not read as "principally" a landscape feature. The SHPO is concerned about the potential for adverse effects from this feature. The SHPO's concerns regarding the bluff walks remain and will require further discussion as the consultation proceeds. The SHPO's concerns regarding the design of new features at Building 603 remain and will require further discussion as the consultation proceeds. New buildings: • Adding solar panels may increase their visibility (and reflectivity) and call attention to themselves (and away from the historic building 603 and its setting). • In that regard, consider the design of the new buildings as a modern interpretation/reinterpretation of the "most appropriate Presidio architectural style" as a new (compatible) Presidio architecture (of the future) that can easily incorporate new technology, sustainability, etc. and

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	organization should guide the design and planning, too.	nearby to 603. Unlike on most of the Main Post, the previous buildings adjacent to 603 were not regimented and orderly (see pp. 16-18 of the Design Guidelines), but rather arranged principally in relation to Mason Street, where the rail lines that serviced them were located.	have a vocabulary that identify these new buildings as the next generation of Presidio development/buildings. The SHPO's concerns regarding the design of new features at Building 603 remain and will require further discussion as the consultation proceeds. If glass enclosed porch is not a historic character defining feature, and is being removed, it should not be reinstalled/rebuilt/enclosed again.
26 – 31	It appears that Halleck Street and Lincoln Boulevard should be included in the list of contributing resources within the APE. Halleck Street and Lincoln Boulevard are included in the non-contributors list, but both are called contributors on page 62. Halleck Street seems to be directly affected by the undertaking. Effects to Lincoln Boulevard are unclear. Mason Street seems to be another prominent contributor that should be taken into account and included in the document. Re-check the list of non-contributors that starts on page 30 for accuracy.	Halleck and Lincoln are both listed as contributing resources in the APE (see p. 29 of the FOE). Halleck is listed as a resource that may be indirectly affected (see p. 30); the Trust will add Lincoln and Mason to that category as well to the final document, per the comment. Affects to Lincoln, if any, will be minor (such as removal of non-historic parking lot entrance and new crosswalk ramps); it will be added to the list of directly affected resources. Staff reviewed the non-contributing list and did note that 1029 was on there (it was demolished in the 1990s).	OK. No Trust response regarding Mason Street, which should be included in the assessment of effects analysis. OK.
33	The historic landscape is missing from the discussion of contributing resources within the APE with the potential to be directly affected. It should be considered equally with the built environment and archaeological resources as an important part of the NHLD.	The discussion on p. 52-56 of the FOE is meant to address how the project follows treatment recommendations from previous analysis, much of which concerns the cultural landscape of the project area. In the summary table on p. 70, the landscape is addressed as a project element with affects assessed (not adverse). The Trust requests further clarification around what would be helpful in disclosing the assessment of effect to the cultural landscape for the project site.	The historic landscape should be included in the list of contributing resources in the APE with the potential to be directly and indirectly affected and to the description under section 2.3.5. The assessment of effect should directly address how the undertaking will affect the landscape. Describing treatment recommendations is not the same as analyzing effects.
37 – 38	Explain how the Trust is taking effects to Building 222 into account.	222 is appropriately listed as a contributing resource that has no potential to be affected, directly or indirectly (see p. 26). It is outside of the project site, and the project site is not visible from any point at the building (largely due to the location of 220 to its west).	OK
40	Under Format for Assessing Effects, the document states that Alternative 2 responds to the Doyle Drive BETP, etc. It seems that this should refer to Alternative 3, the	Alternative 2 represents what the Doyle Drive project would have built had the Parklands project not been proposed. Alternative 3 is also responsive to the Doyle Drive BETP and Architectural Criteria, with additional elements that support the project's purpose and need.	OK

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	preferred alternative.		
42 – 51	A photo-simulation of the proposed modifications around Building 603 would be very useful.	See enclosed Exhibit C for architectural details of building 603 and its surrounding site.	
47	Simulation 2. The new elements in the landscape, including the amphitheater, paths, play structure, and poles sticking up are out of scale and too large for the setting. More information is required to assess potential effects on the NHLD.	See enclosed Exhibit D for a refined description of the landscape and its elements.	
50	Simulation 5. The Zocalo appears from this view and without the benefit of the context of surrounding buildings to be too natural looking and inappropriate for the foot of a previous military post.	The Zocalo is intended to be a pedestrian-scaled, mix of landscaped/hardscaped area with adjacent planters, site furnishings and lawn areas, with the centerpiece being the existing stand of Monterrey cypress trees. The character of this area is intended to be compatible with the landscape of the adjacent, Main Post, but differentiated from the latter's rigid, regular geometry, since that never existed north of Lincoln. This simulation was prepared to emphasize the views, and not necessarily the character of the Zocalo that will be experienced with the existing and new buildings on two sides, and Lincoln Boulevard on the third.	The SHPO's concerns regarding the design of the Zocalo remain and will require further discussion as the consultation proceeds.
53 – 54	Please demonstrate which historic connections exist between the upper and lower post along Halleck and Bank Streets, and how they are they being "preserved." The term "historic connections" is unclear. Clarify if it refers to those specific roads and their contributing status. Clarify if Halleck Street will remain historic (presuming it is) following reconstruction. Bank Street's status is unclear, as it has been omitted from the resources lists earlier in the document. Clarify the scale of expansion being considered for Building 603. Because this is being included in the Parklands undertaking, the parameters need to be	Halleck Street is outside of the project site. Halleck is a contributing roadway that is being re-established in its original alignment (with changes in elevation) by the Doyle Drive project. It will include vehicular, pedestrian and bike connections between the Main Post and Crissy Field. Halleck Street's contributing status would be re-evaluated by the Doyle Drive project upon completion. Bank Street was a contributing roadway that was removed by the Doyle Drive project. While it will not be possible to re-establish the original alignment of Bank Street due to the location of the tunnel mouths, the intent of the current design is to create a pedestrian connection between the upper and lower posts at the west edge of the site, roughly in the area of the Bank Street. The scope of work proposed for 603 includes the two new classroom buildings and landscape/circulation/site features. The free-standing new buildings are not additions to the historic building, but will function together with it as an expanded youth education campus. See Exhibit D for more detail about the new buildings and their relationship to 603.	According to the Preliminary FOE (page 53), the Trust has committed to incorporating architectural criteria included in the Doyle Drive Architectural Criteria Report that are unfulfilled by the FHWA project upon handover of the site. One of the criteria listed in the Preliminary FOE is to preserve historic connections between upper and lower post along Halleck and Bank Streets (page 53). The SHPO acknowledges that Halleck Street is outside the Tunnel Tops project. It seems that the Trust intends to add a new pedestrian trail on the approximate alignment of the former location of Bank Street, which seems to satisfy this criterion. However, adding "several connections between the upper and lower post" (also page 53) besides the Bank Street trail is outside this criterion, and the criterion should not be used to justify the construction of new trails in the landscape. "The parklands project would retain, rehabilitate, and expand Building 603 consistent with the supplemental guidelines, which were developed to guide the appropriate rehabilitation and expansion of Building 603" (page 54). Apparently,

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	clearly stated. It is not clear in this section if "additions to Building 603" refers to the expansion of the building itself or the construction of the two new classroom buildings south of 603.		Building 603 is being expanded. Therefore, the Trust should clarify the proposed expansion being considered for Building 603. Because this is being included in the Tunnel Tops undertaking, the parameters need to be clearly stated in order to understand the scope of work and to assess effects.
54	With regard to the building replacing Building 211, it is difficult to agree that a 9,300 square foot building is "inconspicuous" or complies with the first bullet under Main Post Planning and Design Guidelines.	The intent behind replacing building 211 with a similarly scaled (or smaller) new building is to remove an existing, highly-conspicuous facility that blocks historic views from the Main Parade, and replace it with a compatible new facility that is more in concert with the prevailing organization of roads, views and existing buildings on the site.	The SHPO's concerns regarding the design of the proposed new building replacing Building 211 remain and will require further discussion as the consultation proceeds.
55	It is difficult to agree that adding a 9,300 square foot building emphasizes the openness of the area. Regarding bullet 3, clarify if the Presidio Promenade is the same feature as the proposed Bluff Walk. Clarify the criteria for areas designed for informal play and gathering. The children's playground described in the 5th bullet sounds more formal what the guideline intends. While it is good that views of parked cars from Crissy Field will be "minimized" by topography and vegetation, the guideline states that the Trust will ensure that parked cars "cannot be seen from Crissy Field," which is a stronger statement than minimizing their visibility.	The intent of siting the new building on the eastern edge of the site, aligned with Graham Street and non-historic building 215 is to open up the project site for landscaping/pedestrian use, rather than its current character, which is dominated by vehicles, parking lots and a non-historic building (211) that currently blocks views north from the Main Parade. The Promenade currently runs from the Lombard Gate to the Golden Gate Bridge. It will traverse the project site through the Zocalo (cyclists will have to stay on Lincoln, though bike users will be permitted to walk bikes through the project site). The Bluff Walk is a spur of the Promenade that will align with the northern edge of the site, connecting the overlooks, before reconnecting with the main Promenade near the Lincoln/Montgomery intersection. See enclosed Exhibit E for additional information about the Learning Landscape (play area) on Crissy Field. It will contain features that are more formalized than the bluff top landscape's lawn areas, but designed to be compatible with the natural features and context of the central part of Crissy Field. The setback proposed for the expanded parking area west of 220 (between 200' and 350' between the bluff edge and the northern edge of the new parking) is intended to result in an inability for Crissy Field users to see parked cars on the Main Post.	The SHPO's concerns regarding the design of the proposed new building replacing Building 211 remain and will require further discussion as the consultation proceeds. This point should be made more clearly in the FOE. The SHPO's concerns regarding the design of the proposed playground remain and will require further discussion as the consultation proceeds. What does the updated information demonstrate on this point?

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56	The guidelines state that the Trust will evoke the form of the historic bluff. However, this undertaking intends to evoke the "character of a natural bluff face." Clarify what the form of the historic bluff was and how the new planned bluff will evoke its form. Please note that "positively addressing" the applicable design criteria in these planning documents is not the same as fully complying with the applicable design criteria.	The historic bluff character was that of a natural topographic feature, sloping steeply down from the Main Post to Crissy Field, and covered in grasses and shrubs (see p. 8-20 of the Supplemental Guidelines for historic photos and maps showing how the feature appeared historically, and changed over time). It eventually became crisscrossed with social trails and other footpaths traversing the slope. The bluff was completely eliminated by the construction of the new Presidio Parkway tunnels. The Doyle Drive project will recreate the bluff form by covering the tunnels and steeply grading the new bluff face. The Tunnel Tops project will then shape the bluff face to accommodate overlooks and trail connections, and install plantings that evoke the native plant character of natural bluffs found elsewhere in the Presidio (such as farther west, at the Battery Bluffs). The series of paths connecting the upper and lower portions of the post will be for pedestrians only, as was the case between ca. 1900-1940. The phrase will be changed to "fully complying" in the final FOE.	OK. It should also be noted that fully complying with the design criteria is also not the same as having no adverse effect, so the analysis in the FOE should make a strong case about the potential effects, too.
57	Clarify the ground disturbance expected from the construction of the New Observation Post. Clarify the grade change between the proposed location of the new building and Buildings 210 and 215. Clarify if the new building will be visible from Crissy Field. Clarify how the existing parking area will change. Provide the actual size of the existing Building 211. Its approximate size is given as 9,300 square feet. The guidelines of the new Building 211 need further and fuller definition. Using average height related to sea level is confusing. The SHPO recommends associating the height to existing historic buildings nearby.	Ground disturbance due to construction of the New Observation Post will be guided by an Archaeological Management Assessment and Monitoring Plan so as to avoid the known archaeological deposits associated with the adjacent Quartermaster Complex site (see enclosed copy of the AMA as Exhibit G). The proposed finished floor elevations of the three buildings are as follows: 210 (45'), 215 (49'), New Observation Post (46'). The grade at the NOP slopes N/S from 41' to 46'. The new building will likely be minimally visible from portions of Crissy Marsh and promenade, but not visible from Crissy Air Field. The parking area will be expanded by approximately 30 stalls to the north of the existing parking area west of 220. The new pedestrian plaza west of 201 will be in the same location as the former parking/loading area that once fronted its west elevation, prior to its relocation Building 211 is 9,294 sq/ft (see p. 7 of the Supplemental Guidelines). These guidelines refer back to those that are articulated graphically on p. 27-30 of the Supplemental Guidelines. There, the graphics illustrate how the average and maximum heights are related to nearby building 210. Sea level is used as an absolute point of reference since the grade on the Main Post bluff top changes.	While it is appreciated that an AMA and monitoring plan are in place, the Trust's response does not answer the SHPO's question. The Trust should provide the location and extent of ground disturbance, including the depth. OK The Trust's analysis should not create confusion or questions for the reader. The FOE should make a clear case for why the proposed new construction is not an adverse visual intrusion into the Main Post and/or NHLD.

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58	Construction of the New Observation Post should be the subject of ongoing consultation and design review. Provide the detailed size constraints on the expansion proposed for Building 603.	Additional information regarding the New Observation Post is included in the enclosed Exhibit F. The Trust anticipates discussing these further at the next consultation meeting. The size constraints on the two new buildings proposed to support an expanded Crissy Field Center program are described on pages 21-24 of the Supplemental Design Guidelines.	OK. The Trust should provide this information in the FOE and explain why the proposed new buildings and rehabilitation / expansion of 603 do not constitute adverse effects.
58 – 59	The height comparison for new construction should be with Building 603 and not the new bluff. The guidelines fail to reference the design of the structures, their materials, and other details. The Secretary's Standards should apply to all work to Building 603, not just the interior. Visibility analysis should include views from Crissy Field.	The intent of the Guidelines is to limit the height of new construction in relation to Building 603, so that it is subordinate, and to the new bluff, so that its visibility is limited from the Main Post. These relationships are described on p. 22-25 of the Supplemental Design Guidelines. Appropriate materials for new construction at this location are described on p. 24. The sentence "As the design progresses, it would follow treatment recommendations in the draft supplemental guidelines regarding retention of all remnant character defining features, and for new interior elements to follow the Secretary's Standards" is meant to be inclusive of the entire historic property, interior and exterior. Simulation 2 depicts the project as seen from the southwest edge of Crissy Marsh.	In order to assess effects, the FOE should provide the actual materials proposed. The SHPO acknowledges that visibility of the proposed new construction at and around Building 603 from the Main Post is important. Ideally, the proposed new construction would also avoid adverse effects to 603 and other nearby contributing elements of the NHLD. The sentence is not clear on that point and should be revised to reflect inclusivity. The single view in Simulation 2 is not sufficient to demonstrate that proposed new construction does not adversely affect resources in the Crissy Field area.
59	The document states that the largest new building will not exceed 5,800 square feet, which is half the size of Building 603. Provide the current area of Building 603's footprint, as this would be a more reasonable point of reference for new construction. The document states that the total of new construction near Building 603 will not exceed 7,500 square feet. Please provide the analysis that supports that number. The document states that the total of new construction in the Crissy Field portion of the project site will not exceed 10,000 square feet. Please provide the analysis that supports that number. Also, provide details for other new construction being considered in that area.	The current and proposed footprint of two-story building 603 is 5,900 sq/ft (total of both floor plates is 11,801, as noted on p. 7 of the Supplemental Design Guidelines). The 5,800 sq/ft cap is meant to limit a new building to less than the existing footprint (5,900 sq/ft) and less than half of the total volume (i.e., single story). The 7,500 sq/ft limit is three quarters of the total 10,000 sq/ft for the entire Mid Crissy Area. While somewhat arbitrary, the intent of these numbers is to limit any one building to less than half of existing 603 (see above), and to limit total new construction in this once-densely built sub-district to less than the total square footage of its lone remaining building (11,801). Splitting the total allowable square footage into 75% at the youth campus and 25% at the west end of the site seemed like a reasonable allocation in the guidelines given the programmatic desire to create a modest campus around 603. The Tunnel Tops project may propose a small storage and maintenance building (approx.1,000 sq/ft) at the west end of the site. Flood control measures under consideration include raising the grade at the new buildings behind 603 (which also helps with accessibility) and use of resilient/durable materials (such as concrete flooring) and stem walls to keep high water out of the new buildings.	The footprint of each of the proposed new buildings should be less than the footprint of 603. However, a 5,800-square foot building is a large new element within the NHLD, especially when the proposal calls for a second new building in the area. The preliminary FOE does not successfully make the case that the proposed new construction does not constitute an adverse effect. The SHPO is concerned about potential adverse effects from the overall size of the new buildings are compatible with the historic building and its setting, and whether their adjacency is also compatible (since they appear to be designed as a compound), and about their scale in terms of the historic building being 2-stories and the new buildings being 1-story in height. Where does the 10,000 square feet come from? If the Trust intends to propose an additional "small storage and maintenance building," this should be included in the description of the undertaking and be clearly included in the FOE analysis.

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	Provide details for flood control measures being considered. Provide details for expected ground disturbance from the entire portion of work in the area of Building 603. The rehabilitation of Building 603, construction of two new classrooms, and other modifications in this location should be the subject of ongoing consultation and design review.	Ground disturbance associated with work around 603 will be guided by the Archaeological Management Assessment (enclosed as Exhibit F) and Monitoring Plan (to be developed in coordination with CDs) in order to avoid contributing and prehistoric archaeological resources. Please see additional materials depicting the new classroom and Field Station buildings, and associated site work in Exhibit E, for discussion at the next consultation meeting.	This information should be included in the description of the undertaking and the potential effects assessed in the FOE. While it is appreciated that an AMA and monitoring plan are in place, the Trust's response does not answer the SHPO's question. The Trust should provide the location and extent of ground disturbance, including the depth. Proposed new construction (buildings and landscape features) in the vicinity of Building 603 remain of concern to the SHPO and have the potential to constitute adverse effects.
61	Provide details regarding new hardscape features being considered in the location of the Zocalo. The information provided is not sufficient to assess effects (see previous comments). The area needs to be treated differently than an overlook in one of the more "rural" areas of the Presidio or the bluff itself because it is at the foot of the Main Post. Compatibility of new construction in this area with the historic vocabulary of the Main Post and Building 210 will be crucial to assessing effects.	Hardscape that will replace the non-historic asphalt parking lots and concrete walkways will include a concrete plaza, paths, and decomposed granite planters (around the cypress), along with landscaped and paved areas adjacent to the three buildings that edge the site. The Trust strongly agrees that the new landscape and buildings south of the bluff edge need to be compatible with the adjacent Main Post. However, the proposed design strives to avoid replicating the character of the Main Post north of Lincoln, where it historically has either been undeveloped, used as a back-of-house service district (stables and support structures), or scattered with a series of temporary structures unrelated to the strong geometry and formality of the Main Post (see p. 6-20 of the Guidelines). Measures were taken in the new design, for instance, to not extend the geometry of the Main Parade north of Lincoln, and to incorporate a network of paths, lawns, paved and planted areas that optimize views, strolling, contemplation, gathering and passive recreation. The Trust respectfully disagrees with the characterization of the proposed Zocalo and overlooks as resembling the "rural" areas of the park (such as Inspiration Point, Immigrant Point, Crissy Field Overlooks). Paved areas and paths on the Bluff top are substantially larger in scale, interspersed with lawns and ornamental planting areas. Unlike the rural areas of the park, the Zocalo will also be framed by buildings on two sides (Visitor Center/210, Transit Center/215 and the New Observation Post).	This point is one of the reasons why photo simulation # 5 on page 50 is not a clear representation of what is planned in the Zocalo location. No buildings are represented.
62	According to the document, segments of Halleck Street and Lincoln Boulevard will be altered as part of this undertaking. Specify which alterations will occur as part of the Parklands project. This is another example of the clarity and separation needed between the Doyle Drive	As stated on p. 62, alterations to Lincoln and Halleck will occur under the Presidio Parkway/Doyle Drive project. The Tunnel Tops project does not propose to alter either roadway, save for infill of non-historic driveways and new curb ramps/crosswalks on Lincoln. No changes to the historic widths or alignment of either road is occurring as part of the Tunnel Tops project.	The FOE should be clear on this point. The preliminary FOE states that these actions are "common to all project alternatives, including the undertaking."

	February 2016 SHPO Comments on the Preliminary Finding of Effect, October 2015		
Page	**Comments**	**PT Response to Comments**	**SHPO response to PT response to SHPO comments**
	undertaking and the Parklands undertaking. If adverse effects to these contributors to the NHLD will occur as part of this undertaking, then they must be resolved and the preliminary finding of No Adverse Effect will not be accurate. Indirect effects on these two roads should be taken into account.	 The Trust will include a statement that the roads will not be indirectly affected in the final document.	 Analysis in the FOE should provide evidence to support this statement.
63 – 65	If testing or monitoring during construction identified archaeological features, the Trust's plan needs to include notification and consultation with NPS and the SHPO. The Archaeological Monitoring Plan should be part of this consultation and submitted to the SHPO and NPS for comments. Existing plans for ground disturbance and any modifications during design development should be part of ongoing consultation with NPS and the SHPO for the Quartermaster Complex, Quartermaster Dump, and Stream Ravine Dump. The Archaeological Monitoring Plan should be shared with NPS and SHPO for comments.	The Trust has prepared an AMA and will prepare monitoring plans to ensure that activities that are part of this undertaking avoid adverse effects to archaeological resources (per the terms of Stipulation VI.A). A copy of the AMA was submitted as part of the 2015 Annual Report, per Stipulation XIV, and is included as Exhibit G in this package. The PA does not include requirements for notification and further consultation under this provision. If the parties have specific comments or questions on the AMA in the annual report, or included as an exhibit to this package, the Trust will address them accordingly.	The SHPO has some comments and questions about the AMA document and has submitted them along with this response to comments matrix. The SHPO has requested specific details for ground disturbing activities (locations, scale, depth).
65 – 67	At this point, the SHPO is unable to concur that there will be no cumulative adverse effects to the NHLD. Taking several current and future projects (Parklands, Building 201, Mason Street Warehouses, Building 610, Quartermaster Reach, Crissy Refresh, etc.) into account will be a challenge based upon the information submitted so far.	The Trust is unsure what additional information is needed, and is respectfully comfortable with the level of assessment for cumulative effect. Parklands (Tunnel Tops) is the project described herein; the relocation and rehabilitation of Building 201 is part of the Doyle Drive project; the plans for Building 610 are unchanged from PTMP; Quartermaster Reach is a project that achieved a "no adverse effect" finding in consultation with the SHPO's office in 2010; Crissy Refresh remains in early concept development by the NPS and GGNPC.	See the comments in this column for additional information requested based upon the information provided to date. A full and clear project description is the main item that is missing. Cumulative adverse effects from this and the other undertakings mentioned in the SHPO's comment seem likely given the amount of change and new features proposed. Analysis of cumulative effects in the preliminary FOE is not sufficient.

February 2016 SHPO Comments on the Draft Final Supplemental Design Guidelines, October 2015

Page	**Comment**	**PT Response to Comments**	**SHPO response to PT response to SHPO comments**
General	The language in these guidelines is excessively permissive rather than assertive. This may have the effect of rendering the guidelines ineffective.	Language has been revised throughout the document in response to the comment (see below and the enclosed document for specifics).	A redline version of the Guidelines would be helpful.
2	Provide the reason that rehabilitation of Building 210 is not being included in the New Presidio Parklands Project.	The rehabilitation of Building 210 as the Visitor Center is a separate action/ undertaking from the Tunnel Tops; the two projects are adjacent but not contingent on one another. The VC has a separate budget, cleared N2 in December 2015, and will go into construction June 2016 in order to open in December 2016.	OK, but this seems like segmenting the undertaking.
3	In the cross section at the bottom of the page, please clarify if Building 211 as shown represents the existing building or the proposed replacement.	The building shown in the cross section represents the existing Building 211 (an (E) has been added to the final document for clarity).	OK
7	Halleck Street and Lincoln Boulevard should be included in the list of contributing resources.	The resources have been added.	OK – check revised guidelines.
21	Treatments should be compatible with the NHLD landscape, but landscape analysis seems to be absent from these guidelines. Any new construction should follow the rectilinear and regularized military development pattern used by the Army at the Presidio. This should be taken into account here as it was for the Letterman Hospital project. Provide the limits for new construction heights near Building 603 and if the height allowed by these guidelines be visible from the Main Post. Provide the square footage allowance for new buildings and clarify if they will be connected to Building 603. Excluding "structures" from the square footage restrictions in the design guidelines leaves an opening for an enormous amount of new construction of non-conditioned spaces. This should be	As stated on p. 4, the Guidelines "do not replace the earlier documents [including the 2012 Main Post CLR and 2011 Mid Crissy Area Design Guidelines]" but are rather incorporated by reference. The passage goes on to state that the Guidelines are intended primarily to guide new construction. The Trust has added a statement reiterating the applicability of the treatment recommendations from the CLR/previous guidelines to the beginning of each section for clarity. The Trust agrees with the comment and believes that the Guideline that begins "Ensure that any new construction…" and the project proposal itself reflect this comment. It is worth noting that the historic pattern of development in both the Crissy and Main Post areas of the project were rectilinear, but not regularized (like the Montgomery Street Barracks, for instance). The Trust has revised the section on structures to clarify its intended meaning, which is to characterize site elements. The Trust also does not wish to allow for enormous amounts of new construction of non-conditioned spaces. The maximum average height of buildings on this site, per the Guidelines is 18' from grade, which does imply a single story building. The current proposal also includes single story buildings only. The Guidelines do not explicitly limit the number of buildings allowed within the 10,000 sq/ft cap. The current proposal calls for two new buildings adjacent to 603, with a possible small (1,000 sq/ft) storage and maintenance building at the west end of the site.	Maximum average height of what? Is that per building or total?-

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	capped as well, ideally at a small number of square feet. Please clarify if these guidelines are recommending only single-story buildings. The guidelines recommend breaking new buildings into smaller volumes. Clarify if there is a limit to the number of new buildings allowed under these guidelines in the Mid-Crissy sub-district. 10,000 square feet of new buildings and an unlimited amount of structures would likely constitute an adverse effect. Please clarify how unwanted use of new structures will occur if the new structures are open on the sides. Clarify what "additions to the horizontal ground plane" means. Clarify which point in Crissy Field's development and history (and Period of Significance) the new construction will "respect." The setting and architectural forms at Crissy Field have changed drastically over time.	The Trust respectfully disagrees that 10,000 sq/ft within the two allowable areas for new construction, along with height, square footage, setback, individual building envelope and other requirements, would categorically result in an adverse effect. The clarification regarding structures is stated above. Further detail about the nature of site elements in this area is provided in Exhibits D and E. The Learning Landscape and Youth Campus will be secured with a compatible fence enclosure (similar to the one across the street at Crissy Marsh) to manage use after hours. The area will also be substantially screened from Mason Street with planted berms so as to enhance the natural character of this portion of the site. Additions to the horizontal ground plane was intended to refer to decks or boardwalks. The term has been dropped in favor of a more detailed explanation. New construction will recall the period of Crissy Field's history during which it was part of the working waterfront (ca. 1916-1958), during which time building 603 (built 1939) and other rectangular, gable roofed structures serviced via Mason Street were predominant. The other (undeveloped) areas of the Mid Crissy site will recall earlier periods, when the natural character of the site was dominant, and will relate visually to Crissy Marsh across the street.	
22	Building heights should not exceed one story and should be aligned and compatible with Building 603 rather than the bluff itself. Clarify what new construction is proposed for the New Construction Zone at the west end of the Learning Landscape, as represented in Figure 20. Points A and B are reversed between the large figure and the smaller one. They should be consistent.	Agreed; The Trust has included height limits that keep any new construction subordinate to 603 and below the bluff top elevation. The Trust is studying a maintenance and storage shed of approximately 1,000 sq/ft for this zone. The comment has been addressed in the Final Guidelines.	Subordinate doesn't only mean shorter. Where will this be located and what will it look like? Guidelines should not have been finalized until consultation on them was complete. The Trust, NPS, and SHPO agreed to table further comments on the design guidelines in the March 7, 2017, meeting. The comments in this chart on the FOE and guidelines were prepared before that meeting, however.

Presidio Trust Responses to SHPO, NPS Comments on the Third Consultation Package, Tunnel Tops Project (October 2015), SHPO Comments March 27, 2017

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23	New decks, ramps, or access features should also not obscure the east or south sides of the building. "Concentrate new deck elements, as needed, on the south side of the building …" New deck elements are not recommended and are not necessary to rehabilitate the building. The highest point of new construction should be lower than Building 603, rather than lower than the top bluff elevation. The view from the bluff is not the only concern. Street visibility, roof planes, etc., could also cause effects, both adverse and cumulative. Wind turbines should not be recommended for this location. Compatibility of PV arrays, green roofs, or other sustainable features should be carefully considered and the subject of ongoing consultation. Please clarify if raising the grade near Building 603 is being considered. The four bullet points regarding future sea level rise and flooding are at odds with each other. Constructing flood control measures and raising the grade are not temporary measures and are not features that would allow for periodic flooding of the site.	The Trust agrees regarding the east (primary) elevation; however, we respectfully disagree regarding the south elevation. This was historically the back (secondary) elevation, thus typically an appropriate place for new features to support the building's rehab and adaptive reuse. The intent of this guideline is to direct new additions to the building's rear, and away from the character defining loading docks on the north and west elevations, and historic pedestrian entrance on the east. A new deck is proposed for the south elevation in order to support access, circulation and new programs at the rear of the building. Agreed; the highest point of allowable new construction is 13.5' below the peak of 603. There is also a desire to limit visibility of new construction from the Main Post, which is why the bluff elevation is cited. Agreed; references to wind turbines have been removed from the final document, and emphasis on compatibility for other features added. The compatibility objective will ideally be balanced with the Crissy Field Center's focus on environmental leadership and education, and the agency's high aspirations around energy use and on site energy production. The project will use the Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings to guide this goal. Raising the grade by 2.5' in the area behind 603 only is encouraged as a measure to guard against sea level rise in this flood prone area. It has the additional benefits of keeping new construction out of remediation land use zones, archaeological sensitivity zones, and facilitating accessibility connections to building 603 (which has a raised floor plate). No grade change is allowed on the east, north or west sides of 603 in order to retain its character defining relationship with Mason Street and elevated floor plate/loading docks. Agreed; the Final Guidelines have been revised to address these incongruities. Climate change is predicted to cause the frequency and intensity of storms to increase the likelihood of flooding in and around building 603. Provisions will be made to mitigate damage by raising the finish floor level of the buildings and providing stem walls that meet the recommended +14 above sea level. At the Learning Landscape, where the development is less intense and elements are more easily replaceable, the site is expected to experience periodic flooding.	The SHPO's concerns about adverse effects remain unresolved by the Trust's response. Design guidelines shouldn't be written to accommodate a project or desired design. Both should be referenced in the guidelines then. Not a final document. Compatibility will depend upon historic character, not Crissy Field Center's focus and aspirations. Not final.
25	Make sure Figure 21 has the dotted line mentioned in the caption. It is missing in one of the versions we have reviewed.	Agreed (the line was missing in the September draft, but added to the October Draft Final).	OK

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27	Treatments should be compatible with the NHLD landscape, but landscape analysis seems to be absent from these guidelines. Any new construction should follow the rectilinear and regularized military development pattern used by the Army at the Presidio. This should be taken into account here as it was for the Letterman Hospital project. Spatial Organization and Land Patterns – North and South views are also important and should not be obstructed by new construction. The highest point of the new building proposed to replace Building 211 should be lower than the top of Buildings 210 and 215. As stated earlier, the design of this building should be the subject of ongoing consultation. "New construction should relate to the overall scale and massing of existing buildings …" Use of "should" here and throughout the document is too permissive. Use of "relate" is vague. The scale of new buildings and possible roof variations must be compatible with the Main Post. Clarify why using new buildings or landscape features is being recommended as screening for the area between Building 220 and Graham Street. Removal of Building 211 is not a sustainable or green measure.	See response above to SHPO's comment on page 21 of the Guidelines. See response above to SHPO's comment on page 21 of the Guidelines. Agreed; the reference to the Bay views is in deference to views to the north. Also, the areas called out for allowable new construction (and the proposed removal of 211) are organized to open north-south views. The Trust agrees that Building 210 should serve as an important reference point for new construction, and will change the guideline related to the highest point to "must be lower" in the Guideline. The Trust disagrees with using non-historic 215 as a maximum height indicator, but does agree that it serves as a logical point of reference, hence the average height limit. The Trust has removed "should" from the guidelines and made the language more directive. "Relate" remains a useful word that connotes compatibility. The intent of this guideline is to screen the non-historic, auto-centric parking area between 220 and Graham, and the bus depot along Graham, from the pedestrian-oriented Zocalo and landscape to the west and north. Understood, but removal of the non-historic building is an idea that enjoys wide	Still not a sustainable or green measure and shouldn't be presented that way.

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		support by the public and agency partners, and greatly enhances historic views and the landscape character in this area of the project site. Any demolition would follow specifications for recycling of building material and diversion from landfills that are standard for Trust projects.	Analysis should state: • Whether 211 is a contributing/historic building. • Whether the demolition is an adverse effect, • State that the demolition will be carried out according to Trust recycling specifications (could also state then if it is part of their sustainability efforts.
28	Excluding non-conditioned, unenclosed space from the square footage restrictions in the design guidelines leaves an opening for an enormous amount of new construction of non-conditioned spaces. This should be capped as well, ideally at a small number of square feet. Points A and B are reversed between the large figure and the smaller one. They should be consistent. The height limit for new construction and average height limit are too vague and should be the topic of further consultation to avoid recommending new construction that would adversely affect the NHLD.	See above response to SHPO's comment on page 21 of the Guidelines. The change has been made to the Final Guidelines. The intent behind using a maximum height and average height was to allow for pitched roofs or roofs of varying heights (in order to break up volumes). The Trust is providing additional information regarding the specific proposal for new construction in this location for discussion at the next consultation meeting in Exhibit F.	
29	The SHPO recommends revisiting the Letterman Hospital compliance regarding building materials and the color palette for guidance. Analysis of these features for new construction and additions occurred during that planning effort. At the very least, the details in the supplemental guidelines should agree with those from the Letterman consultation. Clarify and/or confirm if the guidelines will require that full brick be used or if a	The Letterman Complex Planning & Design Guidelines (2000) are indeed a useful and effective document for that area of the NHLD. However, the Trust developed site-specific Planning & Design Guidelines for the Main Post (2011) and Mid Crissy Area (2011) in consultation with PA parties, in addition to these Guidelines, in order to direct new construction and other treatments in these specific areas. The goal with this material recommendation is compatibility with the Montgomery Street Barracks; a prohibition on faux brick has been added as it likely would not	

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	variety of brick products will be allowed, such as half brick or faux brick. Some Composition board materials may look and weather differently from natural or historically-used materials and should be carefully considered before selecting them. Metal roofing and trim may be allowed on service or shed roofs on small buildings and tertiary facades, but should not be used on primary elevations or on larger buildings.	meet this standard. The use of composition board in these guidelines is based on its use at building 215 (built 2005), where it has weathered and maintained its compatibility in a satisfactory way. Agreed; language encouraging judicious use of metal roofing has been added to the final Guidelines.	 Why is 215 being used as an example to follow if it's not historic (as the Trust makes the point in their reasoning of the SHPO's concern on a height issue (in page 27 block).
31	The SHPO recommends preparation of a Historic Structures Report for Building 603. Please double-check the date of the rehabilitation of Building 603 as 2001 seems too early for when the Crissy Field Center moved into the building.	The Trust respectfully disagrees; given the available documentation, the building's recent rehab, and the limited interior integrity of Building 603, the Trust finds the information in the Guidelines to be adequate for identifying remaining character defining features and directing the proposed alterations to this building. 2001 was confirmed as the move-in date.	
40	This page lists the Character Defining Features of Building 603. However, none of the features listed under "Less Sensitive" are historic or character-defining features and should be included under a different heading, such as later additions or non-historic modifications. The SHPO supports and recommends the removal of the glazed loading dock addition and restoration of the north elevation of the building.	The "less sensitive" terminology comes from the 1993 NPS physical history reports. The heading has been changed per the comment in the Final Guidelines. Alternatives for the treatment of this non-historic feature, including removal, alteration, and retention will be studied and offered for comment.	The 1993 reports should have been updated to reflect the current conditions and changes to the building after that date. Features should be listed as character defining or not, not as less sensitive. Then prioritized as primary, secondary, and tertiary/utilitarian. Again, non-contributing features, if removed, should not be reinstalled as a new feature.

January 2016 NPS comments on the New Presidio Parklands Finding of Effect, Draft Final Supplemental Design Guidelines (Oct 2015)

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	The Trust should downsize the amphitheater and use appropriate vegetation to break up the uniformity of the steps as seen from a distance (NPS).	In response to the comment the Trust changed the terraced seating design to include "softened" edges and the use of additional plantings on its level areas so as to blend it with the surrounding landscape character. The modified design also includes hardscape materials that reduce the visibility of the feature from Crissy Field and beyond. Please see Exhibit C for more information on changes made to this feature.
	The Trust should ensure that the	The intent of the "structures" in the Learning Landscape is not to allow for three

Presidio Trust Responses to SHPO, NPS Comments on the Third Consultation Package, Tunnel Tops Project (October 2015), SHPO Comments March 27, 2017

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	play structures in the Learning Landscape are subordinate to existing historic resources. The Supplemental Design Guidelines should offer more guidance for the structures to avoid an adverse effect (NPS).	sided buildings, or a "garage" as noted in the comment, but rather elements such as a "play structure, site furnishings, land forms and additions to the horizontal ground plane" as stated on page 21 of the guidelines. The Trust worked with the design team to further define the nature of allowable "structures" in the Learning Landscape and refined the applicable language in the final design guidelines. See Exhibit E of this package for examples of the elements currently proposed for the Learning Landscape.
	The Finding of Effect (FOE) should provide more depth to the analysis of cumulative effects on historic resources (NPS). The Trust should acknowledge the rehabilitation of the Mason Street Warehouses as an adverse effect. The Trust should also consider the effect of removing the Commisssary building entirely, and the effect of the project on the former Post Headquarters and redesign of Halleck Street and associated move of historic Building 201.	The Trust respectfully disagrees. The cumulative effects on historic resources are fully addressed in the FOE, including all points raised by the commenter as discussed below. Furthermore, the Trust finds the analysis to be adequate under NEPA and the NHPA and the applicable regulations. Mason Street Warehouses (Buildings 1182-1188): As noted in the FOE (footnote 26), the adverse effect associated with the rehabilitation of the warehouses would be localized to the group of buildings, and when combined with the effects of the undertaking, would not rise to the level of cumulative adverse effects to the NHLD. Commissary (Building 610): The removal of the Commissary is speculative and does not constitute a reasonably foreseeable future action based on the Trust's planning process. The future action for the Commissary in the PTMP identifies the building as a cultural/educational center, which is taken into account in the analysis of cumulative effects. Former Post Headquarters (Building 220), Building 201 and Halleck Street: The FOE evaluates the cumulative effects of the replacement of Doyle Drive, which includes the removal of historic buildings and streets, and reconfiguring the historic Main Post bluff to accommodate the parkway. The FOE noted that these changes affected the NHLD due to the removal of the contributing resources. Any affects to building 220 would be indirect (visual), as noted in the resource-specific analysis.
	The Supplemental Design Guidelines should be prescriptive and not discretionary about the treatments of key character-defining features to make clear that following the guidelines is mandatory (NPS).	In response to the comment, the Trust reviewed the Supplemental Design Guidelines to identify treatment measures that apply to character-defining features, and revised the guidelines in those instances to be prescriptive, rather than discretionary.
	The Trust should take a holistic approach to preserving the historic setting in schematic design. The EA should include a clear commitment that features in the landscape (overlooks, paths, amphitheater, etc.) would not obstruct views, but be visually subordinate to the larger landscape (NPS).	The Trust has studied the project area extensively, and used applicable planning and design guidelines, treatment recommendations from cultural landscape reports and building-specific studies to holistically guide its design process from conceptual through schematic design. These studies include the PTMP district guidelines, the Main Post Planning & Design Guidelines and Cultural Landscape Report, the Mid-Crissy Area Design Guidelines and the New Presidio Parklands Project Supplemental Design Guidelines (see p. 5). These documents address the importance of views, and direct that new elements remain compatible and subordinate to the historic landscape. Main Post Cultural Landscape Report (2012), for instance, includes the treatment recommendation to "Ensure that new designs for areas affected by the construction of Presidio Parkway are compatible with the

Presidio Trust Responses to SHPO, NPS Comments on the Third Consultation Package, Tunnel Tops Project (October 2015), SHPO Comments March 27, 2017

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		historic features of the Main Post and preserve or enhance historic views from the Main Post to the bay" (treatment recommendation G1, p. 295 of the CLR). In response to the comment, the Trust will include a project condition that the new features in the landscape will not obstruct historically-significant views and will remain visually subordinate to the larger landscape.
	The FOE should consider historic buildings 220 (former Garrison Headquarters) and 218 (Fire Station) as part of the Area of Potential Effect.	The Area of Potential Effect (APE) was established through consultation and described as "sufficient" by the State Historic Preservation Officer (the Trust has requested formal concurrence). The APE consists of the Main Post, Crissy Field and Letterman planning districts, which include the two requested buildings among others. Both buildings are listed in the FOE as contributing resources in the APE with the potential to be indirectly affected. The FOE acknowledges that the undertaking would result in a visible change to the landscape when viewed from contributing resources. However, conformance with applicable design guidelines and planning documents would ensure consistency with the Secretary's Standards and compatibility with the character-defining features of the NHLD and its contributing resources, including buildings 220 and 218.

Review of New Presidio Parklands Project Supplemental Design Guidelines Sept 2015, NPS (January 14, 2016)

Page Number	Comment	PT Response to Comments
Inside front cover	Please provide photo date and caption for this image. It is unclear whether this photo is a current image or an modified artist rendition of the preferred alternative	Trust agrees that the image was confusing, and has replaced it with a blank page.
2	Rob's 10/28/15 letter to the SHPO calls the project a "14-acre project" but the Introduction refers to the Trust as "developing 13 acres of new parkland". Please adjust discrepancy.	14 acres is the correct project size; the document was corrected.
3	Move the caption for Figure 2 to the lower left-hand side of the image so the design is consistent with the other figure pages.	The caption has been corrected.
4	Para 1: "in anticipation of new construction associated with the expansion of Building 603 to support the CFC". As you are not proposing to directly construct additions to the footprint of bldg. 603, perhaps change the text to "expansion of programs associated with Building 603".	The language was clarified (new buildings are proposed for the site, but are not directly connected to 603).
4	Provide photo date for this image and if room allows, a caption that provides viewer with information about the direction of view.	Caption added per the comment.
6	In Figure 3, Bldg 201 is missing a number label	Number added per the comment.
8	This photo needs a date and if room allows, a caption that provides viewer with information about the direction of view.	Caption added: "1925 aerial view of Crissy Field and the Main Post looking south."
10	Para 2: "The onset of World War I cut the PPIE short" is inaccurate. The PPIE continued its full operational schedule and closed, as planned, in December 1915. Change the sentence to "After the closure of the PPIE, the city removed the majority of the temporary buildings and the army constructed a large cantonment of……"	Text corrected per the comment.
10	Para 3: "due to treacherous flying conditions resulting from the	Added to text per the comment.

Presidio Trust Responses to SHPO, NPS Comments on the Third Consultation Package, Tunnel Tops Project (October 2015), SHPO Comments March 27, 2017

Page Number	Comment	PT Response to Comments
	construction of the Golden Gate Bridge and advances…..	
10	Para 4: " largely consisted of military motor pool, storage and warehouse buildings…."	Added to text per the comment.
11	Figure 9; please provide date – **circa 1916**- to this photo.	Date added per the comment.
21-29	Sub-District Design Guidelines; there are numerous instances where the SDG are discretionary and not prescriptive about the treatments of key character-defining features. In order to make it clear that the guidelines are mandatory, please replace "should" with "will" in the following places: Mid-Crissy Sub District p. 21: "new construction associated with Bldg 603 **will** favor permeable and open façade" p 23 "new deck, ramp or access features **will** not obscure historic relationship .." p 23 "New construction **must** use materials from the following list" Main Post Sub District P 27 "New construction **must** be sited to the north of existing buildings…" "New construction **must** be set back from the bluff edge to avoid…" P 29 "New construction **must** use materials from the following list:	 Wording changed for clarity. Wording changed for clarity. Changed text. Wording changed for clarity. Text removed. Wording changed.
23	3rd column, 2nd bullet: "Design new construction that is temporary in nature or can be easily repaired or replaced in the event of damage due to flooding" Please elaborate or spell out more clearly how new construction will be "temporary in nature" while also being architecturally compatible within Crissy Field.	Temporary construction is no longer being considered; removed "is temporary in nature" from text.
24	3rd column, 2nd bullet: "Green roofs are permitted…." Please clarify this text as we are assuming that by "green", you mean "living". Please make distinction so that it is clear that you are not suggesting green asphalt tab roof tiles on Crissy Field.	New text reads: "Green (living) roofs…" for clarity.
24	3rd columns, last bullet: On pg 23 the design guidelines suggest to consider the appearance of bldg roofs from Main Post Bluff to hide mechanical systems and other unattractive features located on rooftops. Pg 24 says that photovoltaic arrays may be incorporated into the new construction associated with Bldg 603. Wouldn't the photo panels on the new bldgs adjacent to 603 be visible from the Main Post bluffs? Please address this discrepancy.	Text added that PVs or other sustainable features would be selected based on compatibility, per SHPO comment above.
27	Average height discussion: Consider adding language that offers an	Language added that such elements may only

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	estimation or possible cap on the number of "minor building elements" so that we can all expect only a reasonable number of these taller elements.	be used "sparingly".
28	Bullet 2 "Breaking new buildings into smaller volumes in order to disperse their mass…" needs clarification or better wording. This guideline could be misconstrued as the permission to build more, smaller buildings which would risk "littering" this sub district.	Language added to clarify that "breaking new buildings into smaller volumes" only applies to the limited areas within the site where new construction is allowed (new buildings are not allowed outside of these zones).
29	"Green roof" language: please see comment on p. 24.	New text reads: "Green (living) roofs…" for clarity.
30	Provide photo date for Figure 25 & 26. In Figure 26 caption, please add, "The Transit center, constructed in 2004, is an example…."	Captions edited.
31	Avoid vernacular speak. "Trust historic compliance staff determined that a full blown or unabbreviated HSR was not warranted…"	The word "blown" removed in Final Guidelines.
32	Para 2: Editing inaccurate sentences: " The army removed many of the site's utilitarian structures in preparation for the City of San Francisco's 1915 Panama-Pacific International Exposition. After the PPIE's closure in December 1915, and with America's preparation for a possible involvement in the European War. However with the onset of World War I, the army quickly replaced the elaborate temporary city…….	Text corrected per the comment.
32	Para 2: "The landscape was further altered in 1936, with the completion of Doyle Drive to support the new Golden Gate Bridge."	Text corrected per the comment.
32	Para 3: "The site changed again with a flurry of construction in the run up to World War II as the army constructed several buildings as part of the premobilization effort before WWII. By War's end 1945 the Mid-Crissy area consisted of….	Text corrected per the comment.
33	Para 1: minimal Spanish Colonial Revival Mission Revival features. Please see the NPS July 2015 comments from the Bldg 99 HSR: There needs to be a consistent agreement and use of the two architectural styles "Mission Revival" and "Spanish Colonial Revival." At GGNRA, we identify the early, pre-1930s army stucco buildings (San Francisco Port of Embarkation, circa 1912; Fort Winfield Scott, circa 1917 & the earliest buildings constructed in relation to the development of Crissy Field, circa 1920s) as Mission Revival. They are the very simple, unadorned white stucco buildings with red roof tiles where the only decoration is the shadow play between the deep and arched fenestration pattern. During the 1930s, especially at the Presidio, this style became more "stylized", if you will, into the more adorned, thickly-plastered and almost Baroque Spanish Colonial Revival.	Text corrected per the comment.
36	Reconcile the publish dates for the Presidio Physical History Reports. Page 33 says 1995; page 36 says 1993.	Dates reconciled to 1993.

STATE HISTORIC PRESERVATION OFFICER 6

STATE OF CALIFORNIA – THE NATURAL RESOURCES AGENCY
EDMUND G. BROWN, JR., *Governor*

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February 7, 2017

In reply, reference to: TPT_2014_0904_001

Rob Thomson
Federal Preservation Officer
The Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

RE: Tunnel Tops Project, Presidio of San Francisco National Historic Landmark District

Dear Mr. Thomson:

I am in receipt of the Presidio Trust's (Trust) letter received via mail on January 27, 2017, continuing consultation regarding the proposed undertaking at the Presidio of San Francisco. The Trust is consulting with the SHPO in order to comply with Section 106 of the National Historic Preservation Act of 1966 (54 U.S.C. § 306108), as amended, and its implementing regulations at 36 CFR Part 800 and the 2014 *Programmatic Agreement Among the Presidio Trust, National Park Service, the Advisory Council on Historic Preservation, and the California State Historic Preservation Officer Regarding the Presidio Trust Management Plan and Various Operation and Maintenance Activities for Area B of the Presidio of San Francisco National Historic Landmark District, Golden Gate National Recreation Area, San Francisco, California* (PTPA).

In the above referenced letter, the Trust requests a consultation meeting to discuss responses to comments and supplemental design material provided in the March 15 consultation package. The correspondence states that the Trust will extend its 30-day request for a consultation meeting for an additional 30 days beginning on January 16, the date the letter was signed. The letter additionally states that if the SHPO has not responded within this time to schedule a meeting as requested, the Trust intends to proceed with the undertaking under Stipulation IV.C.3 of the PTPA (Waiver of the Opportunity to Comment), while continuing to consult with the National Park Service (NPS) through the remaining phases of design.

The State Office of Historic Preservation (SHPO) is agreeable to meeting, along with other PTPA Signatory Parties, to discuss the undertaking. Please provide a specific agenda, expected outcome, a list of all information and documents to be discussed in the meeting, copies of any new or newly modified documents, at least one week prior to

the meeting. The SHPO can be available by phone for approximately two hours on the following dates and times: February 21 between 1 PM and 4 PM; February 23 between 10 AM and 12 PM; March 7 between 9 AM and 12 PM; March 21 between 1 PM and 4 PM; or March 28 between 1 PM and 4 PM.

As previously stated in correspondence and meetings, the Trust is consulting on an undertaking for which portions are currently under the jurisdiction of another agency, the Federal Highways Administration (FHWA) and its Programmatic Agreement for the Doyle Drive Replacement undertaking (Doyle Drive PA). Until responsibility for the current FHWA portions is formally transferred from the Doyle Drive PA to the Trust, the Trust proceeds with consulting on the FHWA portion of the Tunnel Tops undertaking at its own risk. It is possible that the Trust may be required to further consult on those parts of the undertaking occurring before transfer of responsibility and currently covered by the Doyle Drive PA once the transfer is complete.

For these reasons, the SHPO has repeatedly advised it is consulting on the Tunnel Tops project only for the portions of the project currently under the purview of the Trust.

3-32 In an attempt to eliminate confusion, SHPO comment periods begin upon receipt of the original paper copy correspondence rather than from a date contained within email correspondence. For example, the Trust's January 16, 2017, letter was not received in this office until January 27, so the 30-day response period would not begin until January 27.

If you have any questions, please contact Mark Beason, State Historian, at (916) 445-7047 or mark.beason@parks.ca.gov.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

CC:
John M. Fowler
Executive Director
Advisory Council on Historic Preservation
Attn. Najah Duvall-Gabriel
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Washington DC 20001-2637

Craig Kenkel
Acting Superintendent
Golden Gate National Recreation Area
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STATE HISTORIC PRESERVATION OFFICER 7

STATE OF CALIFORNIA – THE NATURAL RESOURCES AGENCY EDMUND G. BROWN, JR., *Governor*

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October 4, 2017

In reply, reference to: TPT_2014_0904_001

Mr. Rob Thomson
Federal Preservation Officer
The Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

Subject: Tunnel Tops Project, Presidio of San Francisco National Historic Landmark District

Dear Mr. Thomson:

I have received and reviewed the information submitted by the Presidio Trust (Trust) prior to the September 15, 2017, meeting and emailed to my office on September 25 regarding the above-referenced undertaking at the Presidio of San Francisco. The Trust is consulting with the California State Historic Preservation Officer (SHPO) in order to comply with Section 106 of the National Historic Preservation Act of 1966 (54 U.S.C. § 306108), as amended, and its implementing regulations at 36 CFR Part 800 and the 2014 *Programmatic Agreement Among the Presidio Trust, National Park Service, the Advisory Council on Historic Preservation, and the California State Historic Preservation Officer Regarding the Presidio Trust Management Plan and Various Operation and Maintenance Activities for Area B of the Presidio of San Francisco National Historic Landmark District, Golden Gate National Recreation Area, San Francisco, California* (PTPA).

The Trust proposes to conclude consultation on the entire Tunnel Tops undertaking with a "conditional no adverse effect," or, as it is described in the PTPA, "historic property affected, no adverse effect through conditions."

As mentioned in the September 15 meeting and in an email from my staff on September 29, I am willing to consider resolving consultation for the entire undertaking with a Finding of No Adverse Effect through Conditions. I also agree that further consultation to establish these conditions is the appropriate next course of action. To that end, I submit this letter to assist in minimizing effects on the National Historic Landmark District (NHLD) and resolving the consultation. The following list references the

comment matrix and line numbers from the chart emailed to the consulting parties by the Trust on September 25.

General Comment

- As a condition for the Finding of No Adverse Effect, the SHPO recommends modifying the designs to avoid adverse visual intrusion caused by new paving. The use of Integral Colored Concrete (or something similar) for any new concrete will reduce the visual prominence of the overlooks and paths. Alternatives to solid concrete pavement that would reduce the hardscape and visual effect of new paving should also be considered.

Building 603 Rehabilitation

- Item 1: No further consultation regarding the historic loading dock is necessary. From the SHPO's perspective, this item is resolved.

- Item 2: No further consultation regarding the new canopy is necessary. From the SHPO's perspective, this item is resolved.

- Items 16 – 17: The SHPO agrees with the rehabilitation approach described. The Trust has sufficiently documented the integrity and work proposed for the interior of Building 603 and no further consultation about it is necessary.

    - However, the SHPO proposes continuing consultation on the glass annex on the north side of Building 603 as a condition for the No Adverse Effect finding. For this consultation, please provide full-size 50% Construction Documents of this feature, along with any applicable specifications and cut sheets.

Terraced Seating

- Items 3 – 6: Design is better and responsive to previous comments. The SHPO proposes continuing consultation on the final design and detailing of this feature as a condition for the No Adverse Effect finding. Please provide full size 50% Construction Documents for this feature.

Western Hollow

- Item 7: No further consultation regarding this item is necessary. From the SHPO's perspective, this item is resolved.

- Items 8, 13 (Welcome Plaza), 14 and 15 (Bluff Top Landscape): The SHPO appreciates the effort to make the north edge of Lincoln Boulevard a transition area between the Main Post and the Tunnel Tops area.

- However, the curvilinear design as shown in the documents provided by the Trust erodes the historic military distinctions that are character-defining features of the Main Post area of the National Historic Landmark District.

- The SHPO proposes that the Trust implement a more rectilinear design for pathways in this transition area as a condition for the No Adverse Effect finding. SHPO proposes the Main Post transition area be defined as the area from the north edge of Lincoln Boulevard to a line approximately three feet north of the current Observation Post (Building 211) and extending east to the Transit Center (Building 215).

Canteen

- Item 9: Removing the new Canteen Building from the design is responsive to previous comments and appreciated.

  - However, the information provided for the replacement proposal of a new canopy and outdoor dining area is not well defined in the information provided.

  - The SHPO proposes continuing consultation on 50% Construction Documents as a condition for the No Adverse Effect finding.

3-34

Building 201

- Based upon the clarification provided by the Trust that the rehabilitation of Building 201 will be subject to a separate consultation, the SHPO has no further comments.

  - However, the design of the new outdoor use of the area adjacent to the west side of Building 201 requires further consultation. The SHPO proposes continuing consultation on 50% Construction Documents as a condition for the No Adverse Effect finding.

Overlooks and Paths

- Items 11 and 12: The SHPO is concerned about the visual prominence of the paths and overlooks.

  - Continuing consultation on this point is a condition for the Finding of No Adverse Effect.

  - In continuing consultation on this item, the Trust should describe how it intends to reduce the visual prominence through material choices. As

mentioned in the General Comment above, integral colored concrete and paving alternatives should be used where possible.

Crissy Youth Campus

- General comment: Articulation issues need to be resolved as a condition for the Finding of No Adverse Effect. Provide full-size drawings as the design continues to be developed.

- Item 18: "Trust will engage designer to study this issue (reorienting the buildings) further, offer alternatives in order to resolve." The SHPO agrees to continuing consultation on this item as proposed and as a condition for the Finding of No Adverse Effect.

- Item 19: "Trust will engage designer to study this issue (considering a single building instead of two) further, offer alternatives in order to resolve." The SHPO agrees to continuing consultation on this item as proposed and as a condition for the Finding of No Adverse Effect.

- Item 20: Reduction of the canopy is responsive to previous comments. From the SHPO's perspective, this item is resolved.

- Item 21: The SHPO recommends Presidio white, horizontal siding and red roofs for the new building(s) as a condition for the Finding of No Adverse Effect.

- Items 22 and 23: Fenestration design for the new buildings is responsive to previous comments in the change to horizontal windows rather than vertical. In the September 15 meeting, the Trust proposed using the full-frame wood windows in the Mason Street Warehouses as a design precedent, and to engage the designer "to study this issue further, offer alternatives in order to resolve."

  - The SHPO agrees to continuing consultation on specific details and articulation of the new building(s) as a condition for the Finding of No Adverse Effect.

Learning Landscape

- Item 24: Regarding the proposed berm along Mason Street, the Trust proposed to engage the designer "to study this issue further, offer alternatives in order to resolve."

  - The SHPO agrees to continuing consultation on this item as proposed and as a condition for the Finding of No Adverse Effect.

- Items 25 and 26: Regarding the design of the Learning Landscape, the Trust proposes a 30-day review of 50% Construction Documents as a condition for the Finding of No Adverse Effect.
    - The SHPO agrees to continuing consultation on this item as proposed and as a condition for the Finding of No Adverse Effect.

Cumulative Effects

- The SHPO remains concerned about the gradual degradation of the NHLD that could be caused by undertakings and proposed designs that are not compatible with the historic types of the military landscape and the distinctive uses within specific areas of the NHLD.
- If the design issues and conditions listed above can be resolved through consensus agreement, the SHPO can concur with the proposed Finding of No Adverse Effect.

The SHPO recognizes that adherence to specified review periods will be necessary and proposes a standard 30-day review by PTPA signatory parties for each of the items requiring further consultation. If signatory parties need an extension, they may take an additional 10 days to submit comments.

Consensus agreement on the design questions above will be necessary to implement the undertaking in accordance with the Finding of No Adverse Effect with Conditions. If agreement is reached, then consultation will be considered complete.

If the Trust objects to recommendations made by signatory parties, further consultation will occur. If agreement is not reached, the Finding of No Adverse Effect with conditions may be rescinded, in which case the Trust should follow the dispute resolution clause in the PTPA.

If there are any questions regarding the comments and conditions described in this letter, please contact Mark Beason, State Historian, at (916) 445-7047 or mark.beason@parks.ca.gov.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

CC:

John M. Fowler, Executive Director, Advisory Council on Historic Preservation

Cicely Muldoon, Acting Superintendent, Golden Gate National Recreation Area

Laura Joss, Regional Director, Pacific West Region, National Park Service

PRESIDIO TRUST 1

Presidio Trust

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November 21, 2017

Julianne Polanco
California State Historic Preservation Officer
Office of Historic Preservation
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Laura E. Joss
Regional Director, Pacific West Region
National Park Service
Attention: Doug Wilson
333 Bush Street
San Francisco, CA 94104-2828

3-36

Cicely Muldoon
Acting Superintendent
Golden Gate National Recreation Area
Attention: Elaine Jackson-Retondo
Building 201 Fort Mason
San Francisco, CA 94123

Reference: Consultation on Presidio Tunnel Tops – Conditional Finding of No Adverse Effect

Dear Colleagues:

This letter serves to document and define the parameters of a Conditional Finding of No Adverse Effect for the Presidio Tunnel Tops project (undertaking).

The undertaking is a 14-acre project comprised of the landscaped area at the north end of the Main Post, over the eastern tunnel of the Presidio Parkway and extending into portions of mid-Crissy Field. The project includes the rehabilitation of National Historic Landmark (NHL) - contributing building 603 (Post Exchange, 1939) to accommodate a Crissy Field Youth Center, construction of two new buildings (buildings 601 and 602) to support the building 603 program, and the demolition of non-historic building 211 (Cafeteria, 1968). The project scope also includes landscaping, paths, furniture, and overlooks to support public use of the new landscaped area.

Following a final consultation meeting on October 31, the parties agreed to the following conditions necessary to achieve concurrence on a determination of "no adverse effect with conditions" pursuant Stipulation IV.C.2.d.1.d of the PTPA. The conditions necessary for concurrence are listed below:

Section I: Items Requiring Additional Review

Transit Café Patio Shelter

- The undertaking proposes a rectangular covered patio area of approximately 950 square feet located immediately north of existing building 215 and oriented parallel to Graham Street. The design of the canopy structure will be open, light, transparent, and visually subservient to the Transit Center. The finishes, lighting, and roof material of the canopy will be determined during the design phase.

Learning Landscape Play Elements

- The Tunnel Tops project proposes a set of play elements in the Learning Landscape as detailed in the July 20, 2017, consultation package.

For the Learning Landscape Play Elements and the Transit Café Patio Shelter:

- The Trust will submit a full size 100% schematic design package (SD) for buildings, structures, and landscape to signatory parties that describes the design of the patio shelter and Learning Landscape play elements.
- Within 15 calendar days, signatory parties will return written comments to the Trust confirming that the patio shelter and play elements do not constitute an adverse effect, and therefore are consistent with this determination of "no adverse effect with conditions".
- If the signatory parties cannot confirm the no adverse effect determination, they will consult with the Trust for a period not to exceed 15 calendar days to resolve and maintain the no adverse effect with conditions determination.
- If, after the steps identified in Section I are taken, the signatory parties fail to reach agreement on the any of the above items, any signatory party may raise a dispute under Stipulation IX (Dispute Resolution) of the PTPA. The entire undertaking will be the subject of dispute and The Trust shall stop work on the disputed portion of the undertaking until the dispute is resolved. Work on project elements that are not the subject of dispute may proceed.

Section II: Verification of Design Approach Agreed upon During Consultation

- The Trust will provide full-size, select pages of the 50% Construction Document (CD) set for buildings, structures, and landscape to the signatory parties to provide review, and consultation if necessary, on the further development of the following design elements and verify that they are consistent with the design approach as discussed during the consultation process (see Exhibit A). The design elements to be reviewed and verified through this process are as follows:

- Terraced Seating (Exhibit B)
- Transitional landscape between Lincoln Boulevard, the Visitor Center (210) and the Western Hollow (Exhibit C)
- Pavement modification at the Outdoor Use Area west of building 201 (Exhibit D)
- Repairs and modification of the glazed annex on the north elevation of 603 (Exhibit E)
- Windows, siding and entry of new building 601 (Exhibit F)
- Learning landscape/Mason Street edge condition; berms and tree eliminations (Exhibit G)
- Lowered height of the Central Overlook (Exhibit H)
- Path modifications (Exhibit I)
- Reduced CYC courtyard canopy (Exhibit J)
- Enhanced planting on east elevation of building 602 (Exhibit K)

- Within 15 calendar days of receipt of the 50% CD set, signatory parties will return comments to the Trust confirming that the drawings reflect the design approach agreed upon during the consultation and therefore are consistent with this determination of "no adverse effect with conditions".
- If the signatory parties cannot confirm that the drawings reflect the design approach, they will consult with the Trust for a period not to exceed 15 calendar days on these elements.
- If, after these steps, the signatory parties fail to reach agreement on any of the above items, any signatory party may raise a dispute under Stipulation IX (Dispute Resolution) of the PTPA. The entire undertaking will be the subject of dispute and The Trust shall stop work on the disputed portion of the undertaking until the dispute is resolved. Work on project elements that are not the subject of dispute may proceed.

Integral Color Concrete Sample

- The Trust will provide each of the signatory parties with a sample of the integral color concrete for wall elements (dark gray) to confirm that this approach is consistent with the concrete color palette described in Exhibit A.
- Signatory parties may respond in 15 calendar days with any comments or questions on the color sample.

Final Drawing Set

- The Trust will provide the signatory parties with an electronic version of the 100% CD for buildings, structures, and landscape set as a record of final project conditions.

Section III: Rehabilitation of Building 201

- The Trust will review the rehabilitation and/or tenant improvement scope for building 201 as a separate undertaking under Stipulation IV.C.1 of the PTPA when it receives a proposal. The Trust will notify signatory parties via electronic mail when design for a specific proposal commences.

General Provisions

Failure to Respond

- Failure to respond to comment opportunities within any of the timeframes established above shall be deemed a waiver of the opportunity to comment on the item under consideration, per Stipulation IV.C.3 of the PTPA.

Dispute Resolution

- If the parties fail to reach agreement on any of the above conditioned items, or if any of the above conditions cannot be met, any signatory party may raise a dispute under Stipulation IX (Dispute Resolution) of the PTPA. The entire undertaking will be the subject of the dispute.
- If Stipulation IX of the PTPA is invoked, the consultation between the Trust, SHPO, and NPS will conclude and the proposed Finding of No Adverse Effect with Conditions will no longer be applicable.
- As stated in Stipulation IX, the Trust will notify the signatory parties with a written response to the signatories describing how it has taken comments from ACHP into account and the Trust's final decision about the dispute.

Completion of Conditions and Conclusion of Consultation

- Upon completion of the stipulations described above, the Trust shall submit a letter to the signatory parties requesting verification that the conditions have been met.
- If the signatory parties agree, they shall respond with a letter verifying all conditions have been met and the Finding of No Adverse Effect with Conditions stands.
- If the conditions are met, the signatory parties also agree that the undertaking will also have no adverse cumulative effect.
- Final verification will also denote the Trust's compliance with the responsibilities it accepted from the Federal Highway Administration's Doyle Drive Programmatic Agreement through the amendment of that agreement concerning the Tunnel Tops undertaking

Thank you for your efforts to consult on this undertaking.

Sincerely,

Joan Fraser
Chief Executive Officer
Presidio Trust

Julianne Polanco, California State Historic Preservation Officer

Laura E. Joss, Regional Director, Pacific West Regional Office, National Park Service

CC:
Najah Duval, Advisory Council on Historic Preservation

ATTACHMENT

4 SUPPLEMENTAL DESIGN GUIDELINES

JAMES
CORNER
FIELD
OPERATIONS

TUNNEL TOPS PROJECT

Supplemental Design Guidelines

MARCH 2016

DRAFT FINAL

CONTENTS

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PARTNERS

The Presidio Trust is the lead agency for this project, directing the planning, design, and construction effort and managing community outreach and engagement. The Golden Gate National Parks Conservancy, the non-profit partner to the Trust and the National Park Service, serves as the philanthropic and community engagement partner and supports park restoration and enhancement, education, and visitor service projects and programs. The National Park Service is engaged as the manager of the adjacent parklands at Crissy Field and as a partner in interpretation, visitor services, and programming.

COVER IMAGE: PRESIDIO TRUST

INTRODUCTION

The Presidio Trust ("Trust"), working with the Golden Gate National Parks Conservancy and the National Park Service—Golden Gate National Recreation Area ("GGNRA"), is developing 14 acres of new parkland atop a dramatic bluff and at the base of the bluff adjacent to the Crissy Field Center (Building 603) and Mason Street. The project has come about as the result of replacing Doyle Drive, the 75 year-old freeway leading to the Golden Gate Bridge, with the Presidio Parkway. The Presidio Parkway includes an at grade, tunnel-covered roadway that reconnects the two most expansive public spaces in the Presidio: the Main Post and the bay front at Crissy Field. At the top of the bluff, the Visitor Center and Transit Center (in existing Buildings 210 and 215) will anchor a new visitor center plaza that will be designed as part of the Tunnel Tops project. The three acres at the base of the bluff, adjacent to the Crissy Field Center, will include new facilities and grounds for youth programs offered by the Trust, Conservancy, and National Park Service.

The Tunnel Tops have the potential to become one of the most distinctive sites in the country, serving a broad cross-section of local, national, and international visitors. The site is expected to offer a high quality park experience and provide visitor-serving amenities and activities necessary to welcome the public, enrich their visit, and encourage them to return.

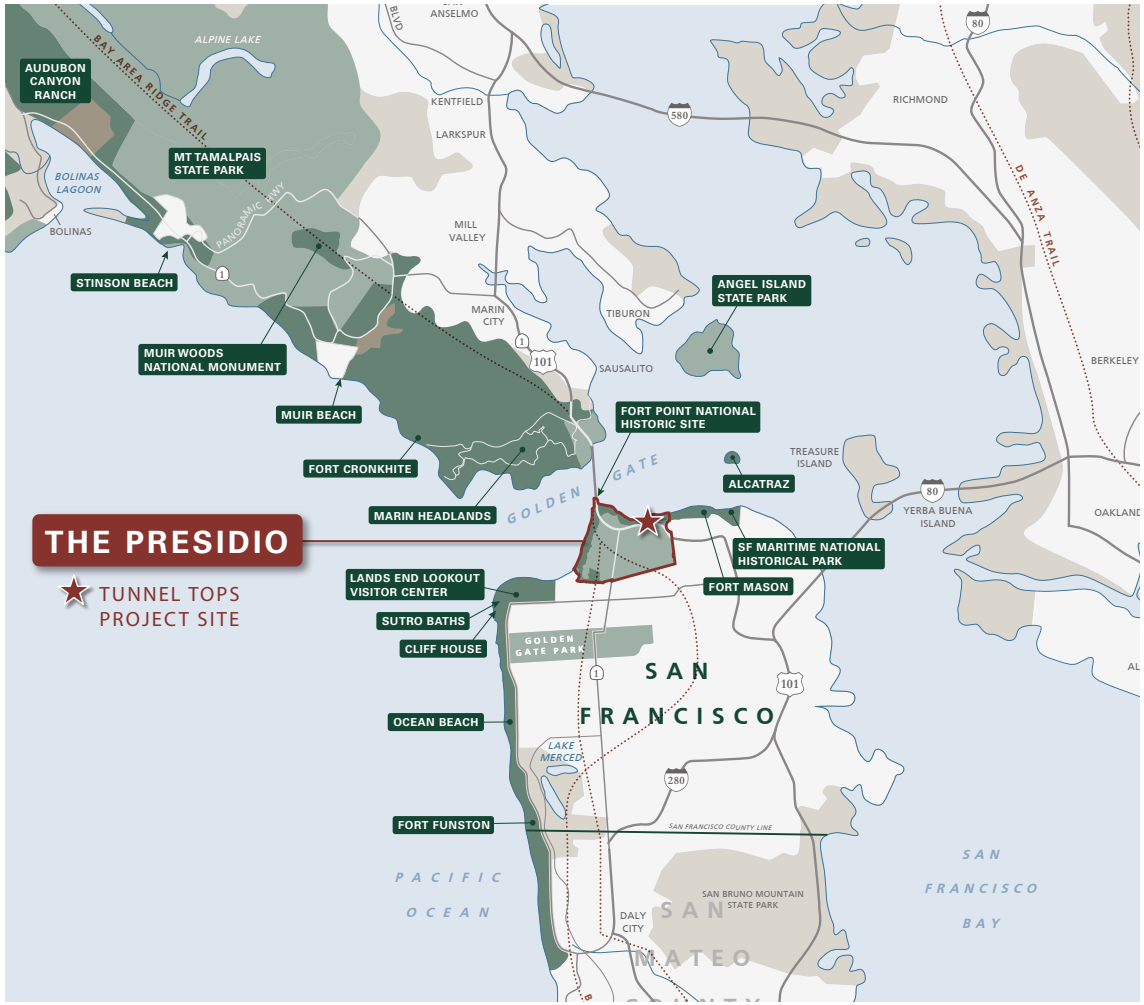


Figure 1

The Presidio is at the center of the 80,000- acre Golden Gate National Recreation Area, one of the largest national parks in an urban area in the world.

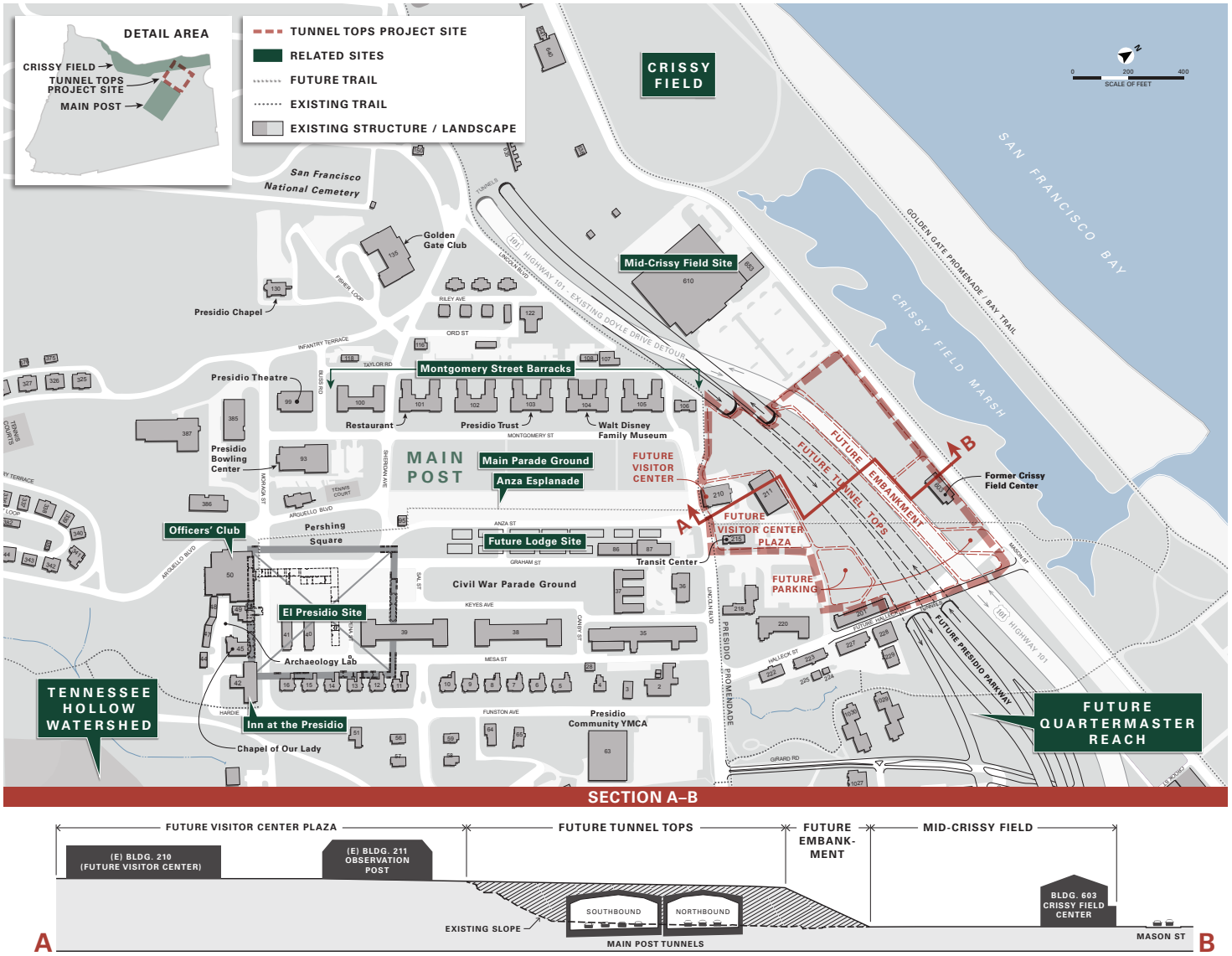


Figure 2
Tunnel Tops project area context.

The Trust develops design guidelines early in the environmental review process to help avoid impacts to the Presidio's natural, cultural, and archaeological resources, and to ensure that projects are consistent with the agency's prior plans and commitments. The Trust has elected to develop supplemental design guidelines for the Tunnel Tops project ("***TT Supplemental Guidelines***") project area, as identified in Figure 2, in anticipation of new construction associated with the expansion of programs associated with Building 603 to support the Crissy Field Center program and serve the general public. New construction on the Main Post Bluff may include new support facilities (janitorial, storage and restrooms) along with the possible replacement of Building 211.

The ***TT Supplemental Guidelines*** builds on ***The Presidio Trust Management Plan*** (2002) and the ***Main Post Update*** (2010), and supplements the ***Main Post Planning & Design Guidelines*** (2011), the ***Main Post Cultural Landscape Report*** (2012), ***Mid-Crissy Area Design Guidelines*** (2011) and ***Doyle Drive Architectural Criteria Report*** (2008).

The ***TT Supplemental Guidelines*** do not replace these earlier documents, which are all incorporated into this document by reference. Rather, these new guidelines are intended to guide new construction now under consideration by the Trust so as to ensure consistency with prior guidance, compatibility with the character of the Presidio of San Francisco National Historic Landmark District, and to help in the development of designs that will avoid cumulative and site-specific adverse effects. They are also intended to assist consulting parties and the public participating in Section 106 review of the Tunnel Tops project (undertaking) according to the terms of Stipulation IV.C.2. of the Presidio Trust Programmatic Agreement (PTPA 2014). Accordingly, a draft version of these guidelines was submitted on September 11, 2015 for review and comment per the terms of Stipulation III.B.2. of the PTPA. This final document incorporates comments from consulting parties received on the September draft and the October draft final.

Once the Presidio Parkway is completed, a tunnel-covered roadway will be the site of new parklands, creating a seamless connection between the Main Post and Crissy Field.

Looking west at the new Main Post Tunnel under construction (c.2011).

RELATED PLANNING EFFORTS

2002 The Presidio Trust Management Plan (PTMP)

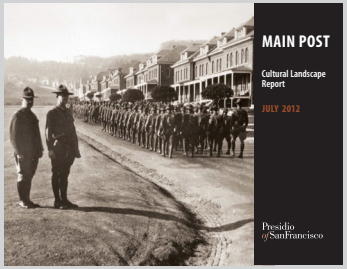
The ***TT Supplemental Guidelines*** builds upon the high-level planning guidelines for the Main Post and Crissy Field Districts—where the Tunnel Tops project is situated—set forth in the 2002 ***PTMP***.

2010 Main Post Update (MPU)

The ***MPU*** was a planning effort to develop strategies to carry out the ***PTMP's*** vision for the Main Post as a "focal point for visitor orientation." The ***MPU*** presents both the historic and planning context for the Main Post to make it the "heart of the park."

2011 Main Post Planning & Design Guidelines (MPPDG)

The ***MPPDG*** were developed to recognize and protect the historic character of the Main Post's archaeological resources, historic buildings and cultural landscapes, so that future changes will not compromise its significance.

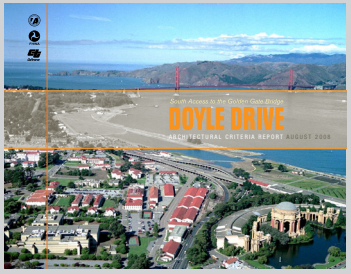


2012 Main Post Cultural Landscape Report (CLR)

In 2012, the Trust updated the 2002 ***Main Post Cultural Landscape Assessment***, augmenting it with new information so that it follows the standardized format of a Cultural Landscape Report (CLR).

2011 Mid-Crissy Area Design Guidelines (MCADG)

The MCADG guides the redevelopment of the Mid-Crissy area in a manner that enhances the whole of Crissy Field and protects its diverse resources. It provides direction for all projects—including building reuse, parking, circulation, and landscape upgrades.



2008 Doyle Drive Architectural Criteria Report (ACR)

The ***ACR*** addresses how Doyle Drive relates to the existing historic, cultural, and scenic resources of the Presidio as well as integrating the facility within the Presidio's transportation infrastructure.

PROJECT AREA

The Tunnel Tops project area includes portions of the Main Post and Crissy Field, two planning districts defined in the 2002 ***PTMP***. The lower segment of the project area incorporates a portion of the "Mid-Crissy" sub-district, bound by the east edge of the Building 610 parking lot, Mason Street, Halleck Street and the Main Post Bluff tunnels. The upper segment includes the "Main Post Bluff" sub-district, a triangle bound by the tunnels, the east edge of the Building 220 parking lot and Lincoln Boulevard. The only structure in the lower portion of the project area is NHLD contributing Building 603; the upper portion includes NHLD contributing Buildings 210 (Guardhouse, 1901) and 201 (Warehouse, 1897) and non-contributing Buildings 211 and 215. See Figure 4 for a full list of the contributing and non-contributing resources in the project area.

The ***TT Supplemental Guidelines*** document is divided into three sections:

- **Section I** outlines the historical development of the Tunnel Tops project area.
- **Section II** includes supplemental design guidelines for new construction in the Mid-Crissy portion of the Tunnel Tops project area.
- **Section III** includes supplemental design guidelines for new construction in the Main Post Bluff portion of the Tunnel Tops project area.
- **Section IV** includes information describing Building 603, its evolution and character defining features in order to assist in the evaluation of rehabilitation plans.

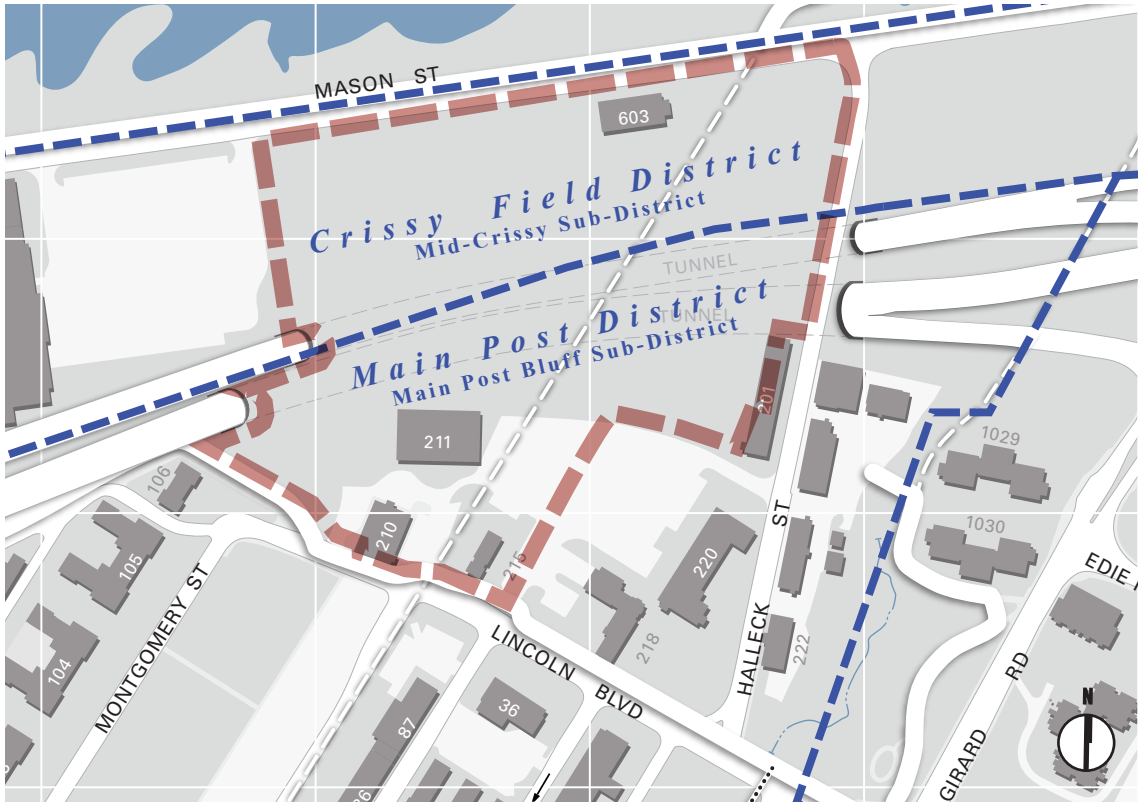


Figure 3
Tunnel Tops project area, 2014.

NUMBER/NAME	YEAR BUILT	SQ FT*	HISTORIC USE	PRESENT USE	FUTURE USE
HISTORIC STRUCTURES					
Building 201	1896	12,330**	Exchange Store	Vacant	Public Serving/TBD
Building 210	1900	6,430	Guard House	Post Office/Bank	Visitor Center
Building 603	1939	11,801	Commissary	Crissy Field Center	Youth/EducationPrograms
Halleck Street	1885	-	Roadway	Roadway	Roadway
Lincoln Boulevard	1870	-	Roadway	Roadway	Roadway
(Old) Mason Street	1920	-	Roadway	Roadway	Roadway
NON-HISTORIC STRUCTURES					
Building 211	1968	9,294	-	Observation Post	Public Serving/TBD
Building 215	2004	1,848	-	Transit Center	Transit Center
ADJACENT CONTRIBUTING ARCHAEOLOGICAL SITES					
Quartermaster's Dump	ca. 1880-1912		Historic Site	N/A	N/A

Figure 4
Contributing and non-contributing resources.

* Building gross square feet.
** Building 201 will be 6,200 SF post-Doyle construction.

1925 aerial view of Crissy Field and the Main Post looking south.

SECTION 1. EVOLUTION OF THE PROJECT AREA OVER TIME

The Main Post Bluff and Mid-Crissy Area portions of the project site comprise an area that has undergone significant changes since the late 19th century. The area that is now Crissy Field once consisted of an extensive tidal marsh at the base of the bluffs that was separated from the bay by large sand dunes. A seasonal creek drained the plateau on which the Main Post now sits, flowing northeast into the marsh near where present-day Building 603 now stands. The ecologically rich area provided bountiful resources for the Ohlone people of the area, who were called Yelamu in the northern peninsula. With the arrival of the Spanish in 1776, the transformation of the area by non-Native hands began, first with the establishment of the adobe fort in today's Main Post, and later by large-scale earth moving activities near the original fort and along the waterfront under the US Army. The development of the Main Post after the American takeover in 1846 followed the original Spanish geometry and orientation toward the bay. While the majority of the Main Post is laid out on a regular northeast-southwest grid atop a fairly flat plateau, the Main Post Bluff area slopes down towards the bay with a wide variety of structures oriented more towards the sloping topography than the grid of the plateau.

BUILDING ORIENTATION CREATED A POROUS END TO THE MAIN POST

The buildings above the bluff were generally oriented along Main Post's north/south axis, although they were slightly skewed from it. This meant that the parade grounds did not have solid, definite ends. Instead, it was possible to see and move between the service buildings to the post's south end.

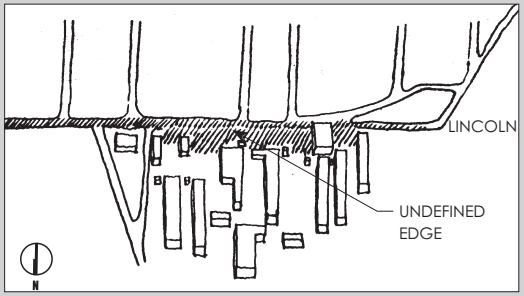


Figure 5
The boundary between Lincoln Boulevard and the service area was undefined.

HISTORICALLY, BUILDINGS AND OPEN AREAS WERE DISTRIBUTED EVENLY ACROSS THE SITE

Through the end of World War I, buildings of a similar type and size were distributed over the level part of the site without a clear hierarchy. The pattern of distribution was irregular, but the density was consistent.

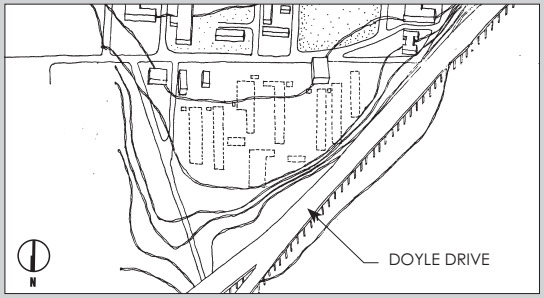


Figure 6
Historically, buildings and open space were distributed evenly across the site.

SINCE THE 1960s THE SITE HAS EVOLVED CONTINUOUSLY

At the end of the First World War, many of the buildings on the site were removed and replaced, with additions such as Building 220 and the Post Fire Station being added post-war. Since then, the lower boundary of Main Post has been the bluff, which was further reinforced by the construction of Doyle Drive in 1936. Since the 1960s, the site has thinned out.

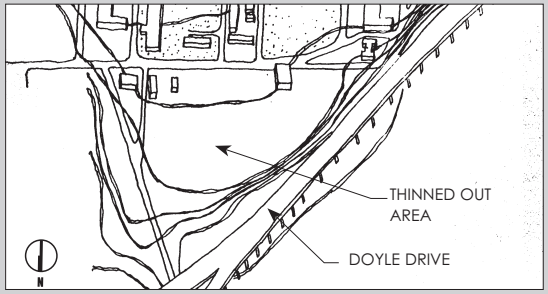


Figure 7
The Main Post Bluff area has thinned out since World War 1.

From the beginning of the American period (1846), when the wharf was moved to the east of the early Spanish-era anchorage, to the 1890s, the area between Lincoln Boulevard and the waterfront contained service buildings, stables, temporary structures and transportation/shipping infrastructure. Due to its proximity to the Bay, several Presidio piers, and the adjacent rail transportation line along the waterfront, the Main Post Bluff and lower bluff area, was the service zone for Main Post and adjacent portions of the Presidio. Unlike the rest of the Post, it was organized for utility rather than ceremony. It included stables, garages, workshops, a guardhouse, the fire station, the connection to the shoreline, and the service railway to San Francisco. Development patterns in the upper and lower bluff areas were similar in function, density and architecture; in these areas individual buildings came and went with greater frequency than they did on the upper part of the Post.

Figure 8
1920's aerial of the Main Post and Mid-Crissy Field area. (National Archives & Records Administration)

The 1915 Panama Pacific International Exposition (PPIE) brought sweeping change to Crissy Field as a whole, completing the fill of the marshland and constructing a vast, temporary "city" of exhibit halls and a racetrack. After the closure of the PPIE, the city removed the majority of the temporary buildings and the army constructed a large cantonment of densely-built barracks buildings in the Crissy Field area, oriented perpendicularly to the shoreline. Infrastructure, including the Mason Street Rail Line, connected the Presidio to Fort Mason and the Port of San Francisco during this time.

Crissy Field closed as an active airfield in 1936 due to treacherous flying conditions resulting from the construction of the Golden Gate Bridge and advances in military aviation. It was at this time that construction of Doyle Drive separated the waterfront from the Main Post, limiting the visual and physical connections between the ceremonial landscapes of the upper bluff and the light industrial functions of the waterfront.

By 1945 the Mid-Crissy area largely consisted of military motor pool, storage and warehouse buildings, many of which remained until the 1980s. The present-day organization of the Mid-Crissy area largely dates to 1989, when the remaining motor pool buildings were removed,

Figure 9
Looking east at utilitarian buildings in the Mid-Crissy Field Area below the Main Post. Bank Street is in the foreground, the Oregon pavilion is in the distance and the Palace of Fine Art is in the upper right corner, c.1916. (Source Unknown)

Figure 10
Looking south at buildings atop of the Main Post Bluff with Building 106 visible in the background, c.1910. (San Francisco History Center, San Francisco Public Library)

and the Commissary (Building 610/653, now Sports Basement) and associated parking were constructed. At the close of World War II, the northern Main Post contained a cluster of Women's Army Corps (WAC) barracks and the extant service buildings. Its present-day use as a transit hub, parking and services area largely dates to the late 1960s, when the booming civilian population working on-Post necessitated dining options for non-service people, and transit infrastructure for commuters.

The Tunnel Tops project, currently underway, re-establishes connections that were interrupted when the construction of Doyle Drive severed the upper and lower bluffs that had historically been connected by a series of informal footpaths and roads at Halleck Street and Bank Street.

The new landscape envisioned in the Tunnel Tops project re-introduces a bluff element, emphasizes open character and historic views from the pre-development period (c.1850), preserves remaining historic buildings and landscape features, and enhances public program opportunities.

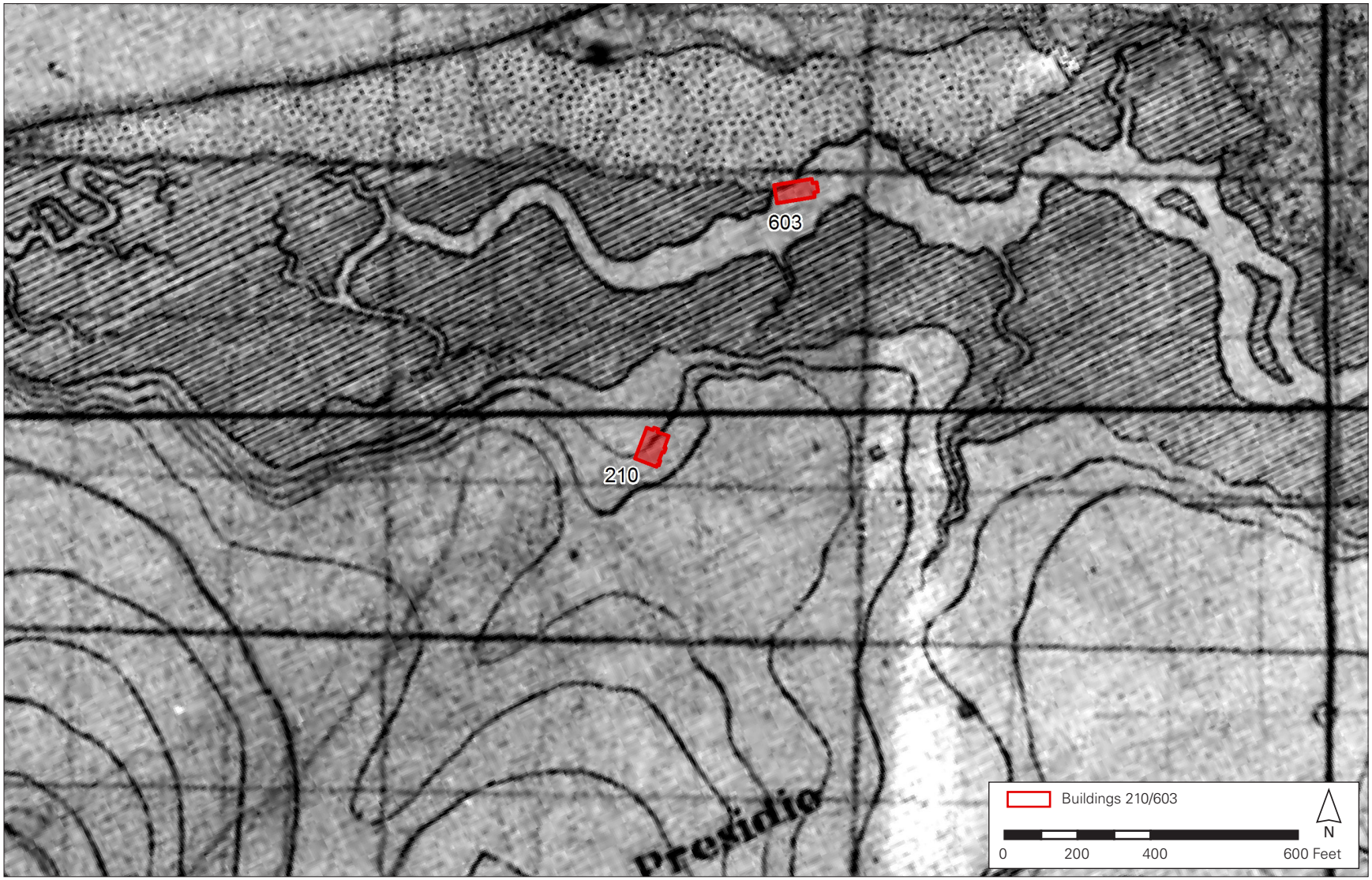


Figure 11
1851 U.S. Coast and Geodetic Survey.

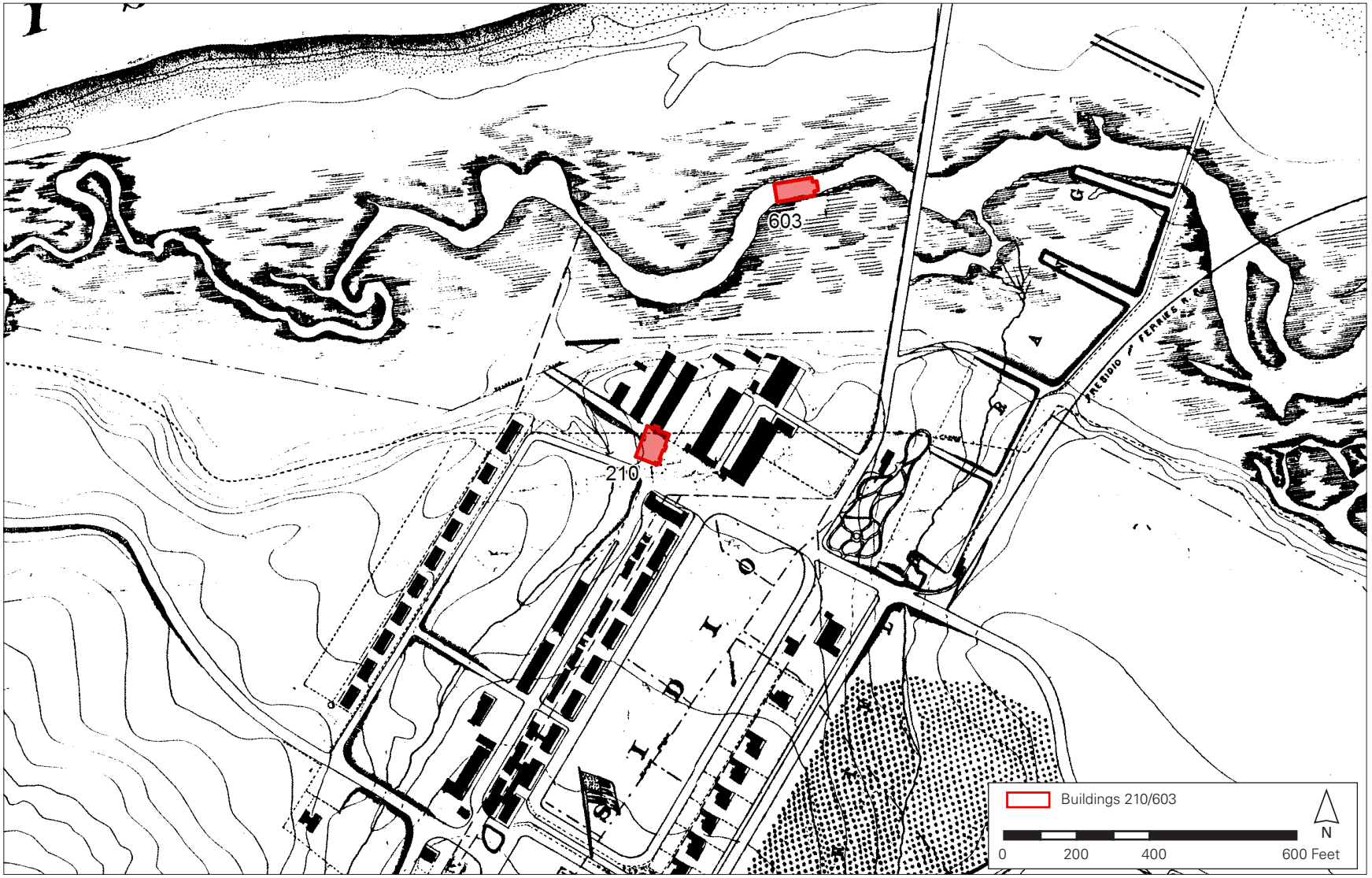


Figure 12
1880 U.S. Army Map.

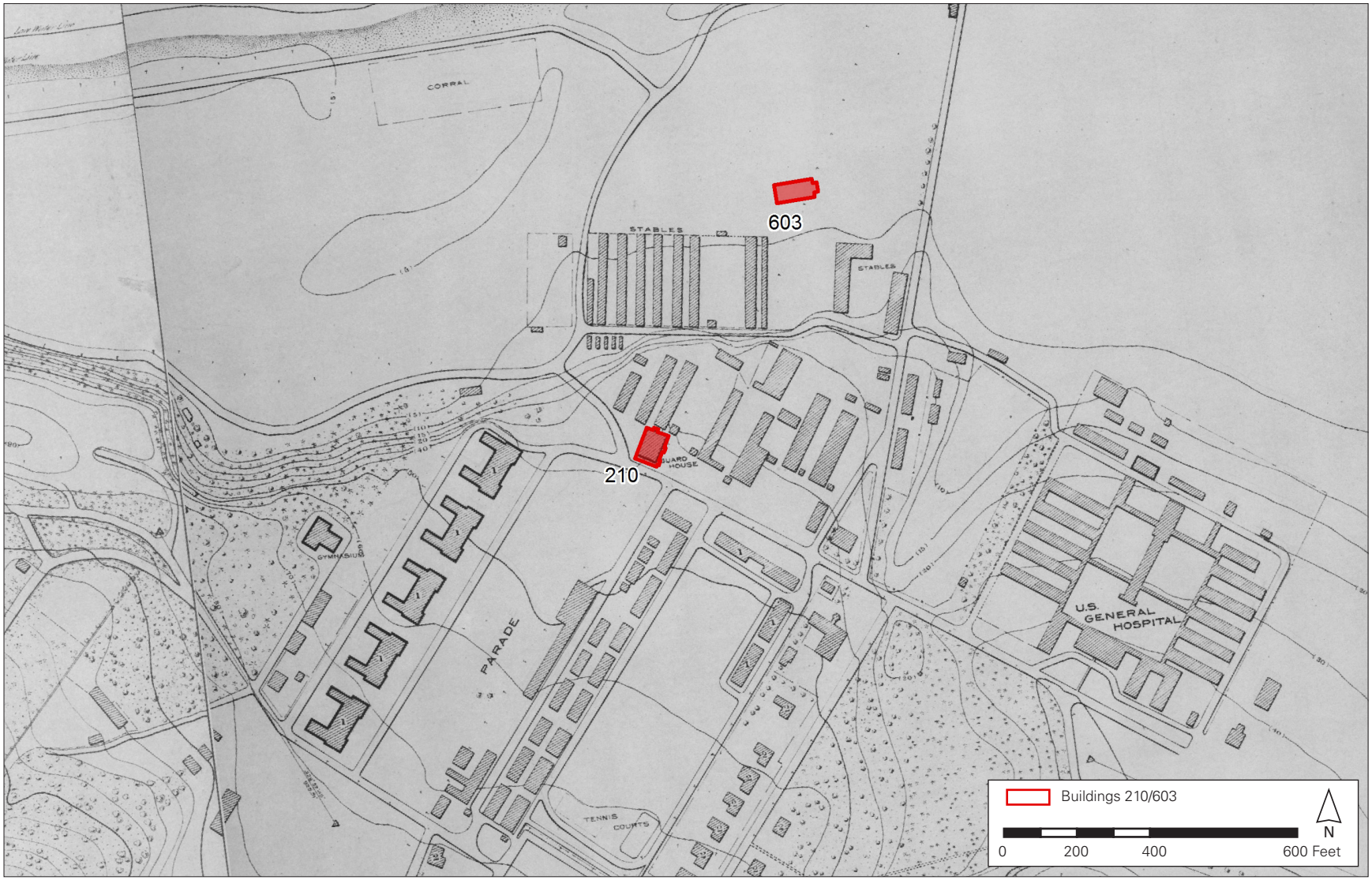


Figure 13
1907 U.S. Army Map.

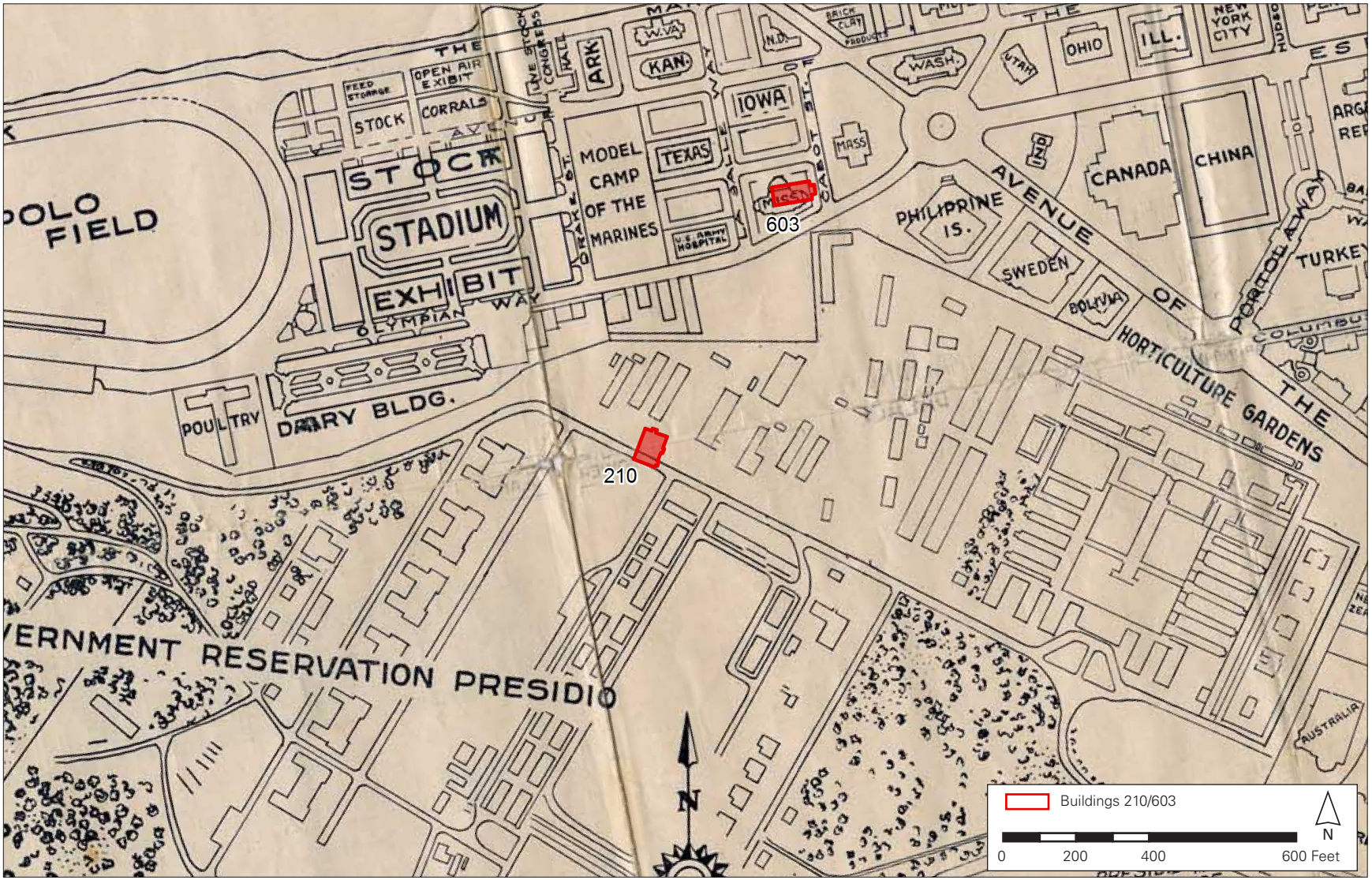


Figure 14
C.1915 U.S. PPIE Map.

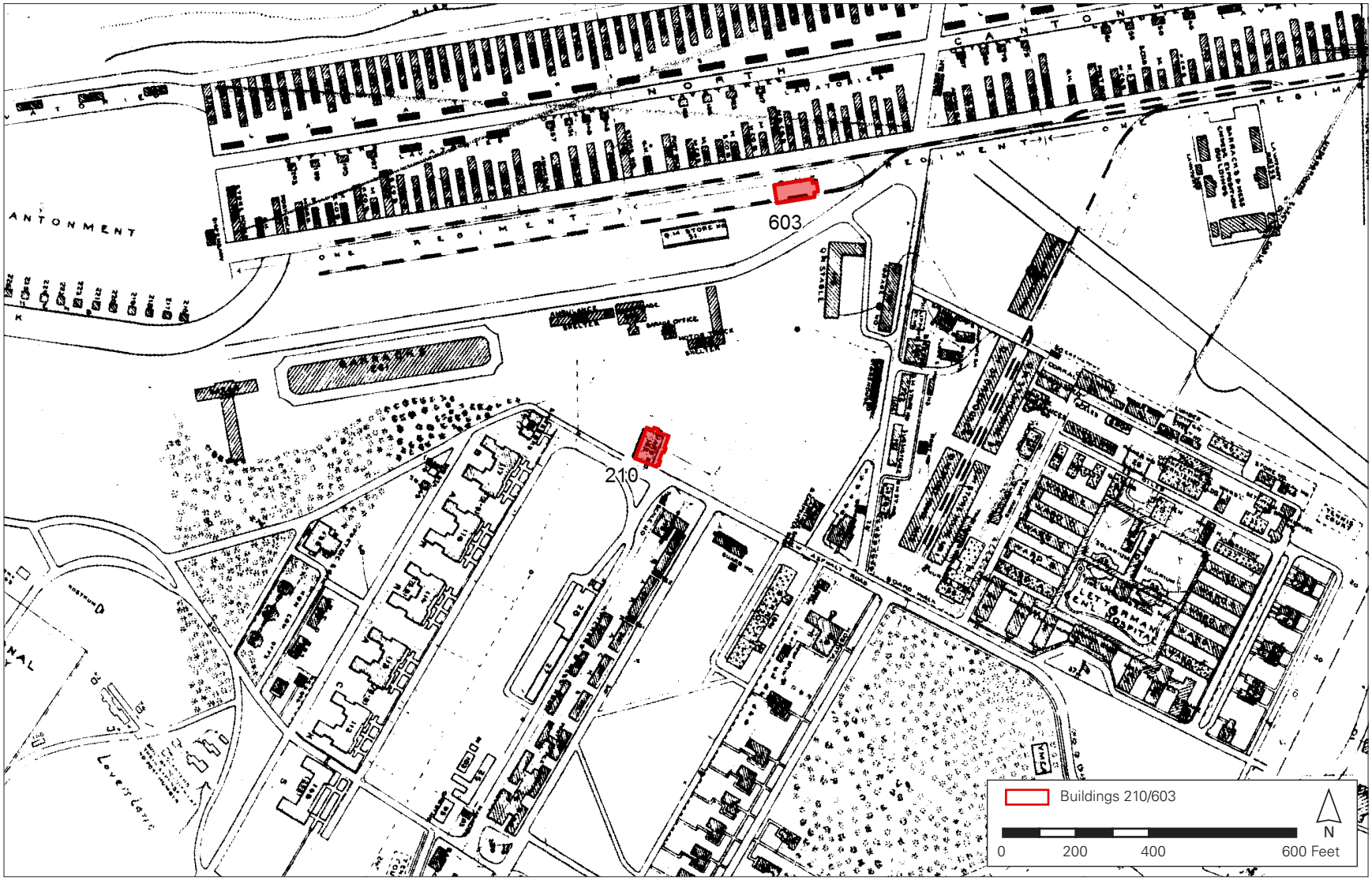


Figure 15
C.1919 U.S. Army Map.

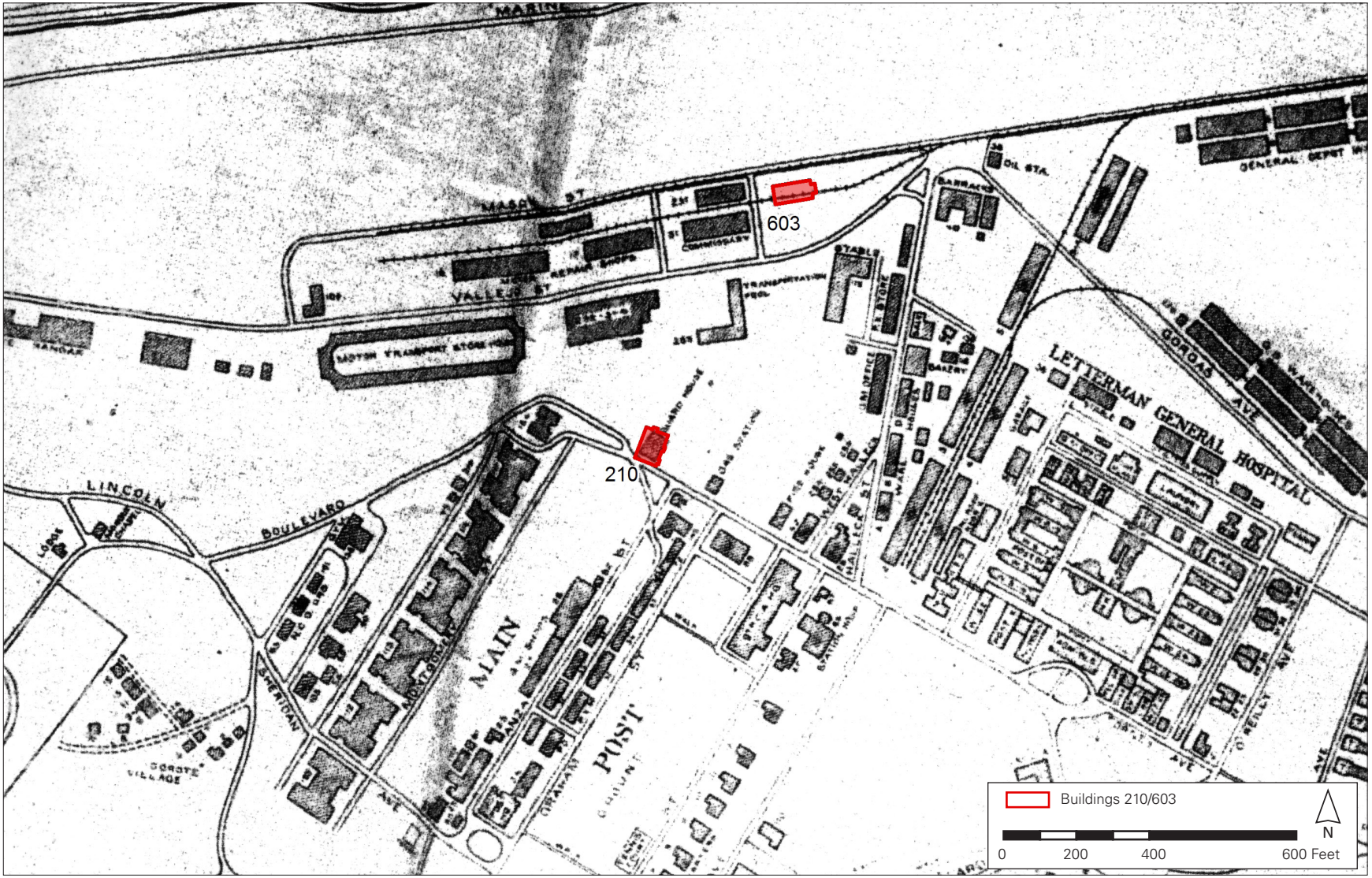


Figure 16
1928 U.S. Army Map.

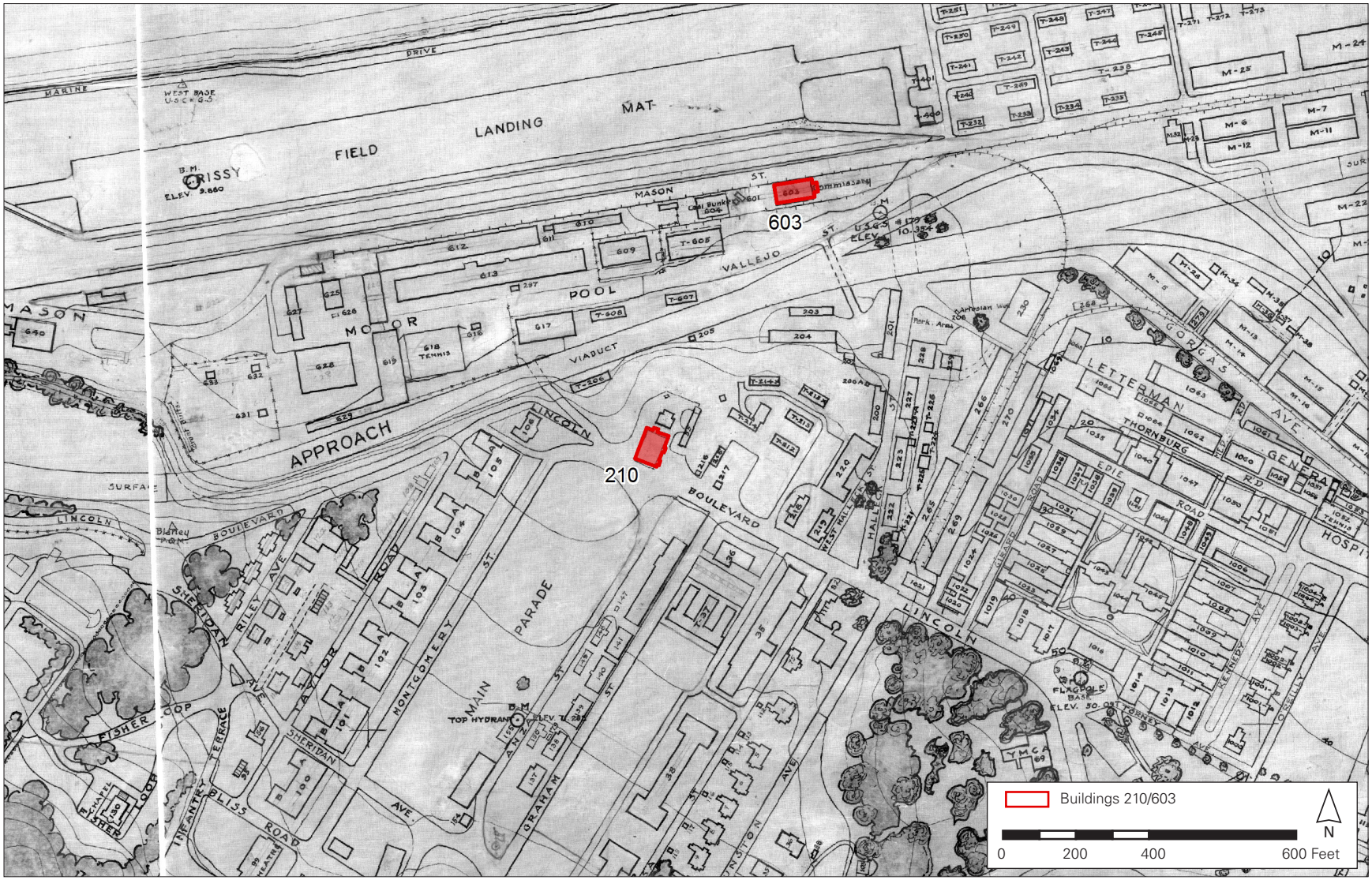


Figure 17
1941-1945 U.S. Army Map.

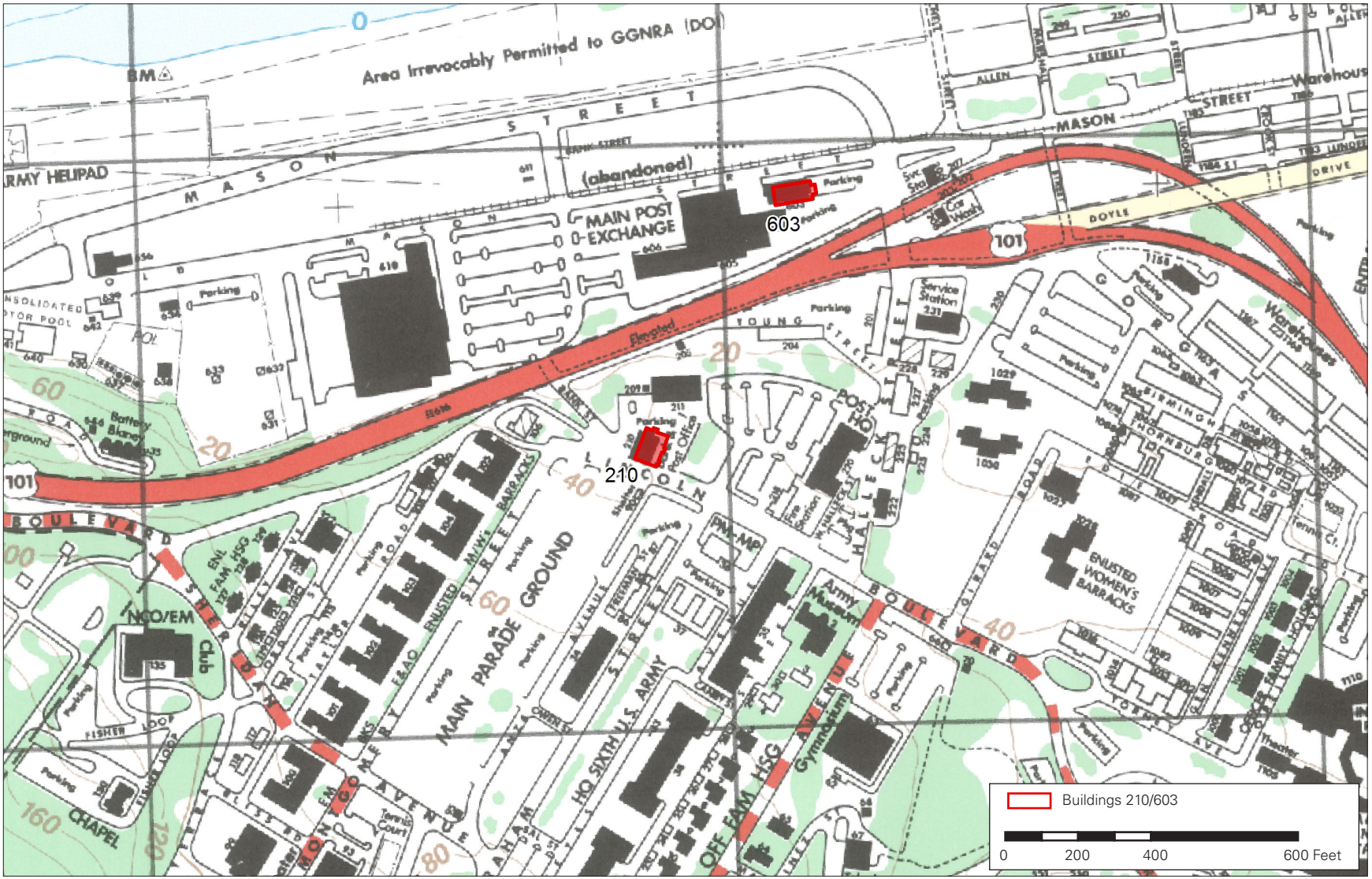


Figure 18
1993 U.S. Army Map.

Figure 19
2004 U.S. Geological Survey Aerial.

SECTION II. SUPPLEMENTAL DESIGN GUIDELINES FOR NEW CONSTRUCTION IN THE MID-CRISSY SUB-DISTRICT

Passages in *italics* are existing design guidelines from the ***Mid-Crissy Area Design Guidelines*** that are applicable to Building 603. They are pulled from the sections on Spatial Organization & Land Patterns, and Buildings & Structures.

Guidelines in **bold** are new supplemental guidelines developed for the Tunnel Tops project.

The landscape design will follow the landscape, spatial organization, and land use pattern recommendations provided in the ***Mid-Crissy Area Design Guidelines***.

1. SPATIAL ORGANIZATION AND LAND PATTERNS

Retain the historic visual and physical relationship between Building 603 and Mason Street.

- **For new construction associated with Building 603, maintain a 70-foot setback from Mason Street so that the west elevation of the historic building is not obscured.**
- **Favor permeable and open facades in new construction associated with Building 603 that allow for strong connections between interior uses and street and/or exterior spaces.**
- **Areas of allowable new construction are shown in Figure 20.**

Ensure that any new construction or building additions are sited and configured to be compatible with the historic district, and are sensitive to the prevailing architectural treatment, scale, massing, and orientation of the historic building clusters.

New site features must comply with the *Secretary of the Interior's Standards for Rehabilitation*. They must be located so as to not damage historic features or to compromise the integrity of the Mid-Crissy subdistrict. This can include compatibly designed and sited features, such as benches, signage, waysides, decking, play stuctures, parking infrastructure and site and street lighting, support structures for new construction and existing buildings (e.g. trash enclosures, small storage boxes) clustered where feasible. In some cases, missing historic features may be reintroduced if there is sufficient documentary evidence showing the size, shape, location, and material of the missing feature.

2. BUILDINGS AND STRUCTURES

Retain and rehabilitate historic buildings in a manner that is consistent with the Secretary of Interior's Standards for the Treatment of Historic Properties. Design building additions and/or auxiliary structures, if any, to be subordinate in square footage, mass, and scale to historic buildings. Site building additions and/or auxiliary structures so as not to compete with the historic entrances or features such as loading docks. Orient new construction to maintain historic relationships *to Mason Street.*

- **No single new building in the Crissy Field portion of the site may exceed 5,800 SF (less than half of the total interior square footage of Building 603's two floors).**
- **Breaking new buildings into smaller volumes in order to disperse their mass over this once-densely built site is encouraged.**
- **Total new construction within the Crissy Field portion of the Tunnel Tops project site may not exceed 10,000 SF.**

Allowable square footage applies to buildings, but not features under the guidelines. Buildings are defined as follows:

- **Conditioned, habitable space (office, classroom, or storage in this setting), equipped with full mechanical, electrical and plumbing (MEP) utilities, four walls and a roof. These buildings count against the square footage limits described under the design guidelines.**

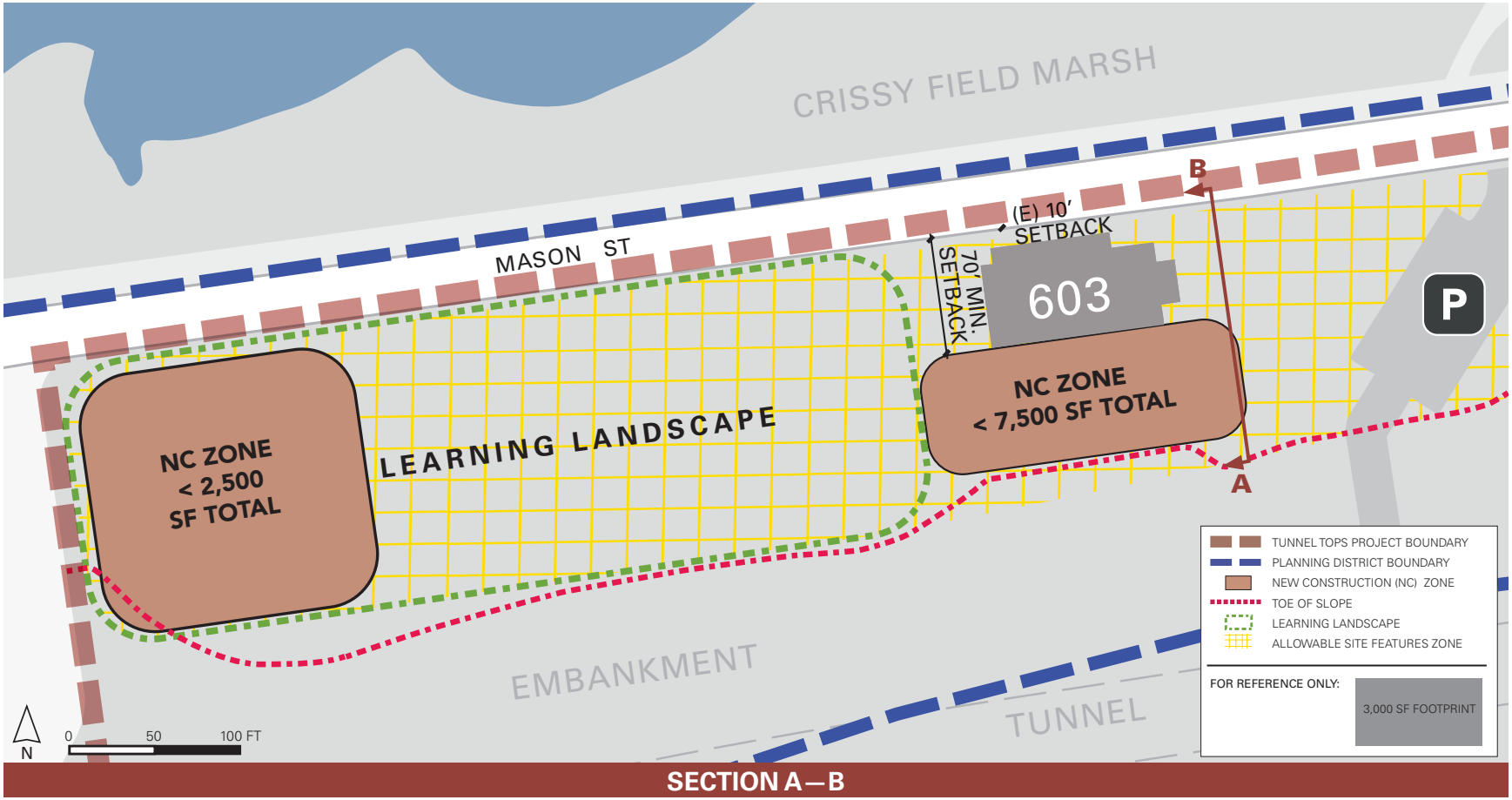


Figure 20

Allowable new construction zone and height limit associated with Building 603.

Respect the simple architecture and repetition of forms that characterize Crissy Field in new construction and building additions. Rely on massing, use of compatible fenestration patterns and building form, rather than applied decoration to give new buildings or additions a distinct identity.

Differentiate new construction and building additions from existing historic buildings, yet maintain compatibility according to guidance from the ***Secretary of Interior's Standards for Rehabilitation****. Design the scale and dimensions of new building elements to respond sensitively to the scale of other Crissy Field structures.*

Make applicable adjustments for access and egress requirements, or explore alternative approaches to these features per the historic building code. Concentrate any new deck, ramp or access features on secondary elevations (west, south) and focus on restoring primary elevations (north, east) to their historic appearances. Avoid obscuring the historic relationship between the loading dock on the north and west elevation of 603, and the building's elevated first floor plate, except sensitive new elements that provide universal access to the building's elevated first floor plate.

Additions to historic buildings (Buildings 603, 631, 632) will be subject to additional consultation and—where necessary—further study, including but not limited to historic structure reports.

Character defining features and treatment recommendations for Building 603 are outlined in the building summary report (Section IV). Follow guidelines for treatment of the building articulated therein.

Preserve views from the Main Post toward Crissy Field, the Bay and Golden Gate, and from Crissy Field to the National Cemetery and Main Post, by keeping the height of new construction below the bluff profile (elevation 45 feet), which is approximately 35 feet above the existing ground elevation at Building 610 and 603 (see Figure 2 on page 3).

The <u>average</u> height of new construction associated with building 603 and the adjacent Learning Landscape must not exceed the height of the bottom of 2nd floor window openings on the south elevations of Building 603—approximately 29.45' above sea level (see Figure 20 and 21). The highest point of new construction cannot exceed the top of bluff elevation—approximately 34' above sea level.

Consider the appearance of building roofs from the future Main Post Bluff, Presidio Promenade, and Cemetery Bluff. Hide mechanical systems and other unattractive features that are often located on rooftops.

As per the *Secretary of the Interior's Standards for Rehabilitation & Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings* (2014), compatibility of PV arrays, green (living) roofs, or other sustainable features will be carefully considered and the subject of ongoing consultation.

Relying on the most current science-based and regionally specific projections of future sea level rise, explore appropriate, innovative and effective approaches to reduce flood damage during the expected life of the project.

- **Incorporate flood control measures into the construction of the building (e.g. a concrete curb or stem wall) to help minimize damage from flooding; and/or**
- **Design new construction that can be easily repaired or replaced in the event of damage due to flooding; and/or**
- **Raise the grade to a maximum of elevation 13.5' above sea level within the allowable zone for new construction in the Mid Crissy area in order to minimize flood damage to the new buildings during anticipated high tide/storm episodes. Raising the grade in the area of allowable new construction may also help to avoid land use controls that overlap this zone, and minimize the potential for encountering archaeological deposits.**
- **Consider landscaping, building materials and other site work that will allow for the periodic flooding of the site.**

BUILDING MATERIAL AND COLOR PALETTE APPROPRIATE FOR USE IN THE MID-CRISSY SUB-DISTRICT

For all buildings, use materials that are visually compatible with the historic Crissy Field buildings (such as stucco and concrete). The color palette should complement the range of colors that predominates at Crissy Field, including Presidio White, terracotta red (found in roofing tiles), and trim colors in brown and/or white.

Limit the use of the following exterior materials: Reflective metal finishes, Dry-vit or EIFS, and reflective glass. Select building materials that are compatible with the existing buildings.

New construction must use materials (or visually equivalent materials) from the following list:

Exterior Wall Materials

- **Cement board form or smooth finish painted in appropriate colors.**
- **Wood: painted horizontal siding, trim, windows, and doors. Stained or unpainted horizontal wood siding should be used sparingly.**
- **Painted or unpainted cast-in-place concrete.**
- **Composition board (e.g. Hardieboard or Hardieplank) used in traditional applications like lap or flat siding, for soffits and trim.**
- **Aluminum or metal panel wall systems.**

Windows and Doors

- **Steel: steel windows, steel exterior doors, steel rails and fences; dark burnished steel and painted steel are acceptable.**
- **Aluminum: windows, storefront, curtain wall, doors are permitted but the profile of aluminum framing members shall be minimized whenever possible. Aluminum to be powdercoated or kynar finished in appropriate colors. Reflective surfaces are not permitted.**
- **Glass: clear glass is preferred, low-e is permitted. Tinted glass should be used in limited quantities and tint should not be readily perceivable. Spandrel glass and obscure glass is permitted in limited quantities.**

Roofing and Trim

- **Shingles and tiles: Red asphalt tab shingles, clay tile.**
- **Metal roofing: painted, galvanized metal is commonplace in the Crissy Field area. Copper, zinc, terne-coated copper, ternemetal are permitted. Built-up roofing, membrane, and other flat roofs are permitted. Green (living) roofs are permitted for flat installation in areas that are not highly visible.**
- **Painted copper flashing/gutters.**
- **Red ceramic tile roof is acceptable if differentiated from Building 603.**
- **Compatibly designed photovoltaic arrays may be incorporated into the roofs of new construction adjacent to 603. Photovoltaic arrays should contribute substantively to the energy consumption of the Crissy Field Center complex. Photovoltaic arrays are not permitted on the roof of Building 603.**

Figure 21

Historic Building 603, the former Commissary Building, was built in 1939. It is a two-story building constructed of board-formed reinforced concrete with Spanish tile roof, gable ends on west and east elevations, and a full-length railroad platform along its north elevation toward Mason Street, designed for moving inventory by railroad. (National Archives and Records Administration)

Dotted line indicates the bottom sill of the 2nd floor windows at approximately 29.45' above sea level.

Figure 22

As part of the transformation to the Crissy Field Center in 2001, a north-elevation sun porch extends atop the railroad platform, with aluminum floor to ceiling windows.

SECTION III. SUPPLEMENTAL DESIGN GUIDELINES FOR NEW CONSTRUCTION IN THE MAIN POST BLUFF SUB-DISTRICT

Passages in *italics* are existing design guidelines from the ***Main Post Planning & Design Guidelines*** that are applicable to the Main Post Bluff portion of the Tunnel Tops project Area. They are pulled from the sections on Spatial Organization & Land Patterns , Buildings and Structures.

The landscape design will follow the treatment recommendations provided in the ***Main Post Cultural Landscape Report***.

Guidelines in **bold** are new supplemental guidelines developed for the Tunnel Tops project.

1. SPATIAL ORGANIZATION AND LAND PATTERNS

New buildings should not obstruct existing views of San Francisco Bay and they should be designed to preserve important east/west views.

*All new landscape features will be consistent with recommendations provided in the **Main Post Cultural Landscape Report.***

- **New site features must comply with the Secretary of the Interior's Standards for Rehabilitation. They must be located so as to not damage historic features or to compromise the integrity of the Main Post subdistrict. This can include compatibly designed site features, such as benches, signage, waysides, decking, parking infrastructure and site and street lighting, support structures for new construction and existing buildings (e.g. trash enclosures) clustered where feasible to limit their impact on the historic site. In some cases, missing historic features may be reintroduced if there is sufficient documentary evidence showing the size, shape, location, and material of the missing feature.**

2. BUILDING AND STRUCTURES

Locate new additions or elements as inconspicuously as possible, keeping in mind that buildings in this cluster are highly visible from all directions.

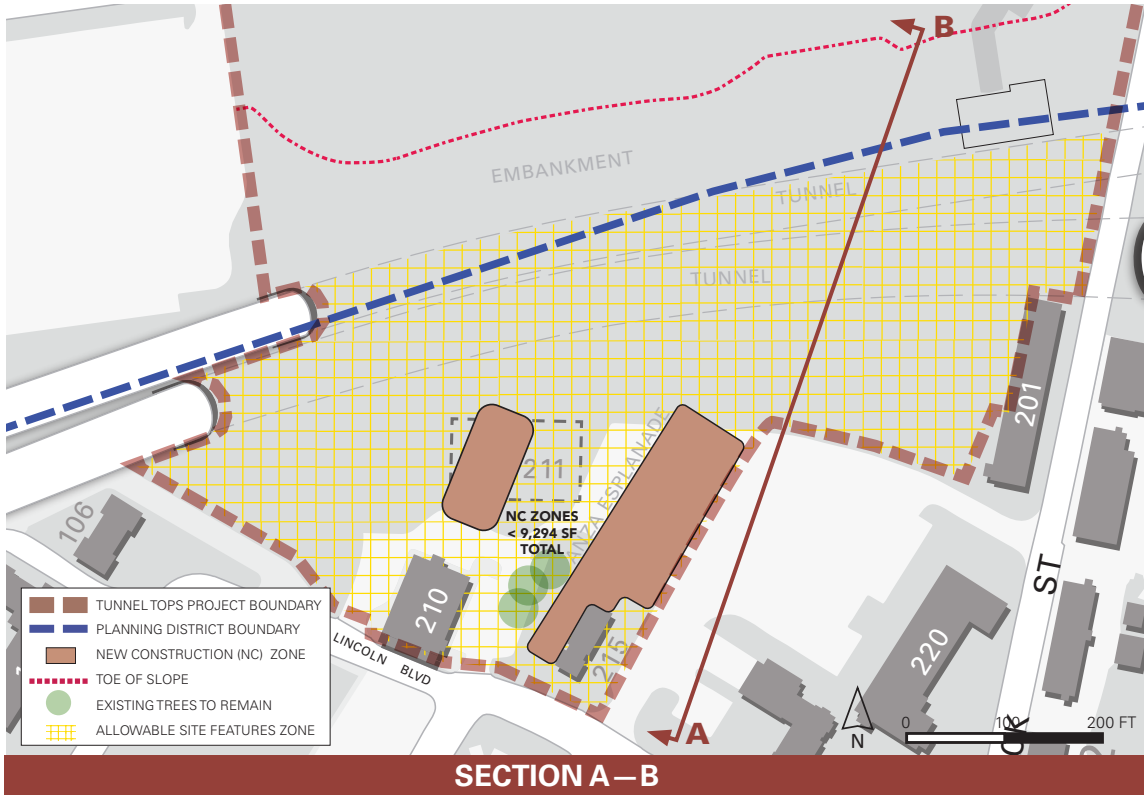
- **Areas of allowable new construction are shown in Figure 23.**

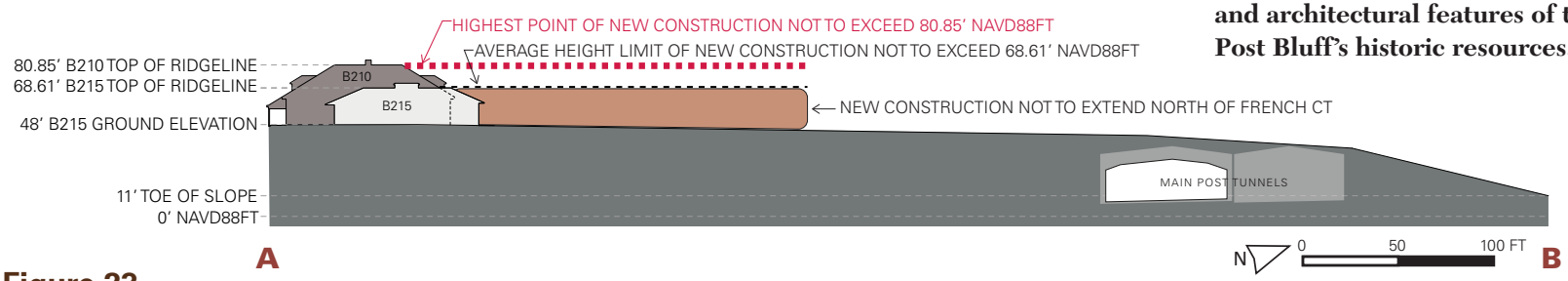
Avoid additions of tall elements that will be visible from the Main Parade. Respect view corridors from other parts of the Main Post when planning changes to buildings in this cluster.

- **The <u>average</u> height of new construction on the Main Post Bluff may not exceed 68.61' above sea level—the peak of the roof of existing Building 215 (see Figure 23). The highest point of new construction must be lower than the top of Building 210—approximately 80.85' above sea level. Minor building elements, such as elevator overruns, flagpoles, or other "signaling" features above this height limit may only be used sparingly.**
- **Relate new construction to the overall scale and massing of existing buildings; consider articulating roof variations and building volumes to achieve this objective.**

Locate any new additions or elements in a manner that emphasizes the openness and views of this predominantly landscaped area.

- **Organize any new buildings on the site according to patterns of historic development in the area (e.g., perpendicular to Lincoln Boulevard and/or parallel with Graham Street).**
- **Site new construction within allowable areas of new construction so as to be minimally visible from the historic core of the Main Post.**
- **Use new buildings or landscape to screen the parking area between Building 220 and Graham Street from the Main Post Bluff landscape area to the west.**
- **Consider removal of non-historic Building 211 in order to re-establish views north from the foot of the Main Parade and the rear of Building 210.**





- **Set back new building construction from the bluff edge so that it is not visible from Crissy Field.**
- **Total new construction within the Main Post Bluff portion of the Tunnel Tops project site may not exceed 9,294 SF—the size of Building 211. Allowable square footage applies only to conditioned enclosed space as described under Section II.**
- **Breaking new buildings into smaller volumes in order to disperse their mass over this once-densely built site is allowable within areas permitted for new construction.**
- **Consistent with the *Secretary of the Interior's Standards*, new additions to the site and/or its contributing buildings will not destroy historic materials that characterize the property, new work must be differentiated from the old and compatible with the massing, size, scale and architectural features of the Main Post Bluff's historic resources.**

Figure 23
Allowable new construction zone and height limit at Main Post Bluff.

BUILDING MATERIAL AND COLOR PALETTE APPROPRIATE FOR USE IN THE MAIN POST BLUFF SUB-DISTRICT

Develop an exterior color palette that complements the range of colors predominant in the Main Post, such as Presidio White, brick red, terracotta (found in roofing tiles) gray-colored stone, and trim colors in brown and white.

Figure 24
Top Left: Example of Brick at the Main Post.
Top Right: Example of gray board-formed concrete at the Main Post.

Limit the use of the following exterior materials: Aluminum or metal panel wall systems, reflective metal finishes, Dry-vit or EIFS, and reflective glass. Select building materials that are compatible with the existing buildings.

New construction must use materials (or visually equivalent materials) from the following list:

Exterior Wall Materials

- **Cement plaster (stucco) applied in a smooth finish painted in appropriate colors.**
- **Brick: in size and color similar to what is found on the Montgomery Street Barracks.**
- **Wood: painted horizontal siding, trim, windows, and doors. Stained or unpainted wood should be used sparingly.**
- **Painted cast-in-place concrete.**
- **Stone: in limited quantities for watertables, sills and trim pieces should be similar to other Main Post stone.**
- **Composition board (e.g. Hardieboard or Hardieplank) used in traditional applications like lap or flat siding, for soffits and trim.**

Windows and Doors

- **Steel: steel windows, steel exterior doors, steel rails and fences; dark burnished steel and painted steel are acceptable.**
- **Aluminum: windows, storefront, curtain wall, doors are permitted but the profile of aluminum framing members shall be minimized whenever possible. Aluminum to be powdercoated or kynar finished in appropriate colors. Reflective surfaces are not permitted.**
- **Glass: clear glass is preferred, low-e is permitted. Tinted glass should be used in limited quantities and tint should not be readily perceivable. Spandrel glass and obscure glass is permitted in limited quantities.**

Roofing and Trim

- **Shingles and tiles: Red asphalt tab shingles, clay tile.**
- **Metal roofing: painted, galvanized metal is commonplace in the Main Post. Copper, zinc, terne-coated copper, ternemetal are permitted if used judiciously. Built-up roofing, membrane, and other flat roofs are permitted. Green (living) roofs, photovoltaics and other sustainable design features are permitted for flat installation in areas that are not highly visible. Use the *Secretary of the Interior's Standards for Rehabilitation & Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings* (2014) to evaluate sustainable design features in this area.**
- **Painted galvanized or copper flashing/ gutters.**
- **Ceramic tile as ornament or in small areas.**

Figure 25
Historic Building 210, the former Post Guardhouse, is a red-brick structure with the typical red asphalt tab shingles.

Figure 26
Building 215, the Transit Center (built in 2004), is an example of how a new building may be successfully added to the Main Post. Its simple rectangular form, its hipped roof, and its color and material palette are derived from character-defining features found on surrounding historic buildings.

SECTION IV. BUILDING 603 DETAILS & REHABILITATION HISTORY

Figure 27
GGNPC and the Trust rehabilitated Building 603 in 2001 to serve as a programs facility. Building 603 is currently being used by CalTrans as a project office for the Presidio Parkway effort. The Trust expects the GGNPC to reoccupy Building 603 once the Presidio Parkway project has been completed.

INTRODUCTION AND PURPOSE

Building 603 is a contributing structure to the Presidio National Historic Landmark District (NHLD) constructed in 1939 as a commissary and storehouse on the Crissy Field waterfront. Following World War II, the army converted the warehouse into a photographic laboratory and audiovisual center (ca. 1947). In 2001, after the closure of the base, the Golden Gate National Parks Conservancy rehabilitated the building to accommodate the Crissy Field Center, a community and education center. The building is currently occupied by an office tenant.

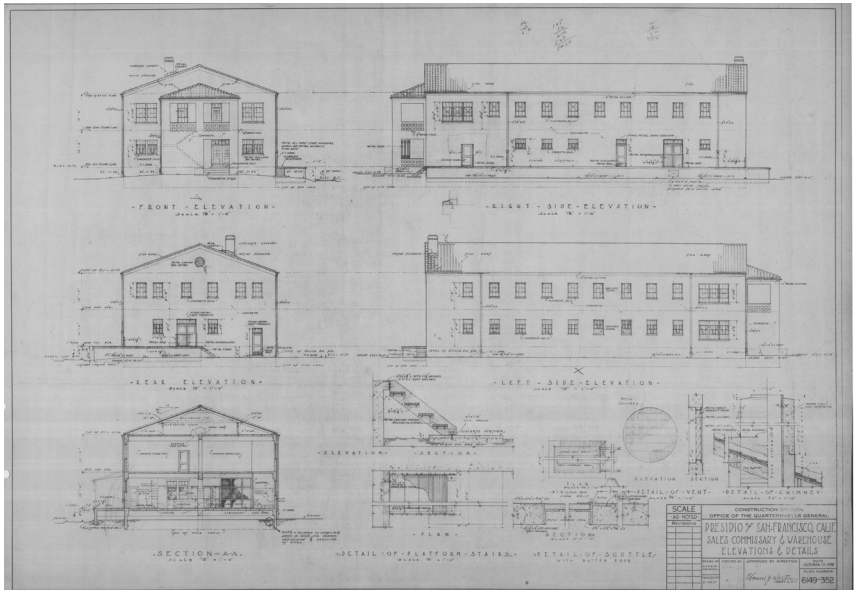
The Presidio Trust, National Park Service, and the Golden Gate National Parks Conservancy have partnered to rehabilitate Building 603 as the new Crissy Field Center. In anticipation of this collaboration, the Presidio Trust has prepared this brief history and analysis of Building 603 to facilitate the future use and design of this building. The following is a summation of this research that provides an overview of the architectural history, historical and architectural significance, and treatment recommendations for Building 603. Trust historic compliance staff determined that a full Historic Structure Report was not warranted due to the low integrity of the building's interior, its recent rehabilitation and limited project funds for such a task.

HISTORICAL BACKGROUND AND CONTEXT

When United States Army first occupied the Presidio in 1846, the future site of Building 603 was located within an extensive marshy area at the base of a bluff. By the turn of the century, much of the natural waterfront was replaced with fill to accommodate the back-of-house needs of the Presidio. To such ends, the army fit out the lower bluff area along the bay with rail lines, shipping/transportation infrastructure, warehouses and stables.

The army removed many of the site's utilitarian structures in preparation for the City of San Francisco's 1915 Panama-Pacific International Exhibit. After the PPIE's closure in December 1915, and with America's preparation for a possible involvement in the European War, the army quickly replaced the elaborate temporary city with a dense collection of wood-frame barracks for the new war effort. In 1921, Crissy Air Field and its associated support buildings opened, but due to dangerous flying conditions and advances in military aviation technology the air field closed in 1936. The landscape was further altered in 1936, with the completion of Doyle Drive to support the new Golden Gate Bridge. The new freeway bifurcated the Main Post and Crissy Field, greatly limiting the formal and informal connections between the upper and lower bluff areas. The Army constructed Building 603 in 1939 as one of several buildings that serviced the busy movements of goods along the Mason Street railway lines.

The site changed again as the army constructed several buildings as part of the pre-mobilization effort before WWII. By 1945, the Mid-Crissy area consisted of a dense collection of motor pool buildings, storage and warehouses. The area remained largely unchanged until 1989, when the remaining motor pool buildings were removed, and the Commissary (Building 610/653, now Sports Basement) and associated parking lots were constructed.



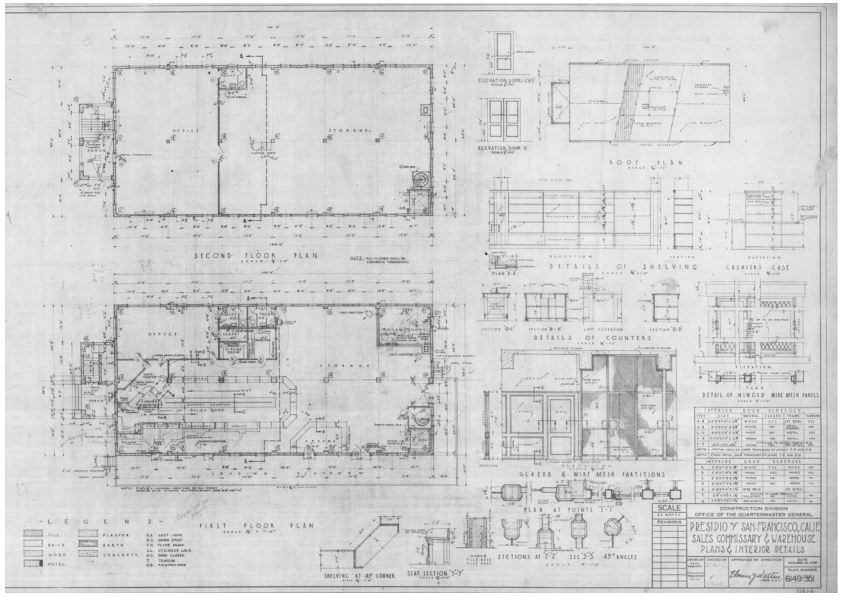


Figure 28

Building 603 elevations, details and plan drawings (c.1938) for the sales commissary and warehouse. (Golden Gate NRA, Park Archives)

BUILDING DESCRIPTION

Building 603 is a two and one half story reinforced concrete structure with a red tile gable roof and minimal Mission Revival features. Measuring roughly 60' x 104' 6" in plan, the building fronts Mason Street, facing Crissy Field, and features a concrete loading dock that runs the full length of the building on the north elevation and wraps around the west elevation. Originally open, the north-facing loading dock was enclosed in glass with a flat roof that serves as a second floor deck as part of the building's first rehabilitation in 2001. The main (east) entrance provides a formal entry point in juxtaposition to the utilitarian, and simple loading dock. A partially enclosed exterior stair case connects the first and second floors. The landing at the second floor opens onto a sheltered porch that features a concrete half-wall with square-shape perforated openings. The building features industrial steel frame hopper windows, of varying sizes, with an integrated security assembly. Larger windows located at the east end of the building, on both floors, correspond to the original administrative use at one end, rather than the retail or storage sections within the remaining two-thirds of the building.

The Building 603 Physical History Report prepared in 1993 offered this description of the building: "Like other buildings of its type, the structure has minimal wall relief, and minimal Spanish detailing. The grid railing on the second floor of the staircase and the flatness of the walls give it a more modern feeling, however than the traditional revival structures."

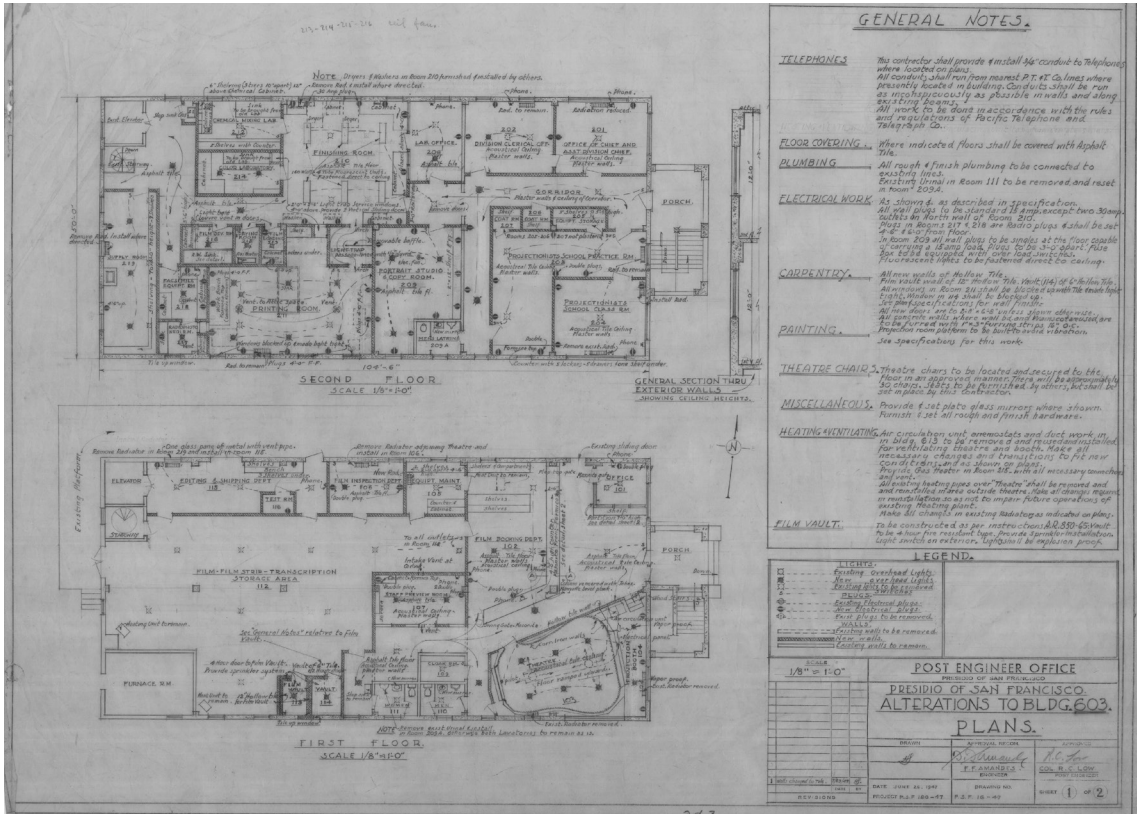


Figure 29
Building 603 alterations and plans (c.1947). (Golden Gate NRA, Park Archives)

BUILDING SIGNIFICANCE AND HISTORY

Period of Significance: 1939-1958

The building is significant as a contributor to the NHL District, therefore its period of significance corresponds to the date of construction (1939) to the end of the period of significance for the district (1945 with draft update to 1958). The building's original commissary use changed shortly after its construction to a photographic laboratory and audiovisual center (ca. 1947) which entailed substantial interior alterations. The 2001 rehabilitation did not treat the later interior build out as historic, so nothing from this second era of use remains in the building today.

Building History:

The army constructed Building 603 as a Commissary and Warehouse in 1939 with funds and labor partially sourced from the P.W.A. (Public Works Administration) and W.P.A. (Works Progress Administration). The building, sited within the shipping and transportation district on (Old) Mason Street, featured a loading dock adjacent to the Mason Street rail line that could allow for easy and loading and unloading from rail cars. Constructing Quartermaster Major F. D. Jones offered a succinct description of the building in his 1940 Completion Report:

> *The Commissary and Warehouse consists of the salesroom, officer and storage space. There are approximately 4,700 square feet of storage space available. The building is on H section steel piles about 40 feet long. It is reinforced concrete building with clay tile curtain walls. (Jones, 1)*

Building 603 has maintained relatively high level of exterior architectural integrity however the interior was modified by a change of use in 1947 and subsequent rehabilitation in 2001. In 1947, the army modified the commissary and warehouse to accommodate a photographic laboratory and television studio that operated until the Presidio closed in 1993. The rehabilitation scope in 1947 and subsequent modifications resulted in the removal and construction of partition walls, an auditorium, and blocked windows.

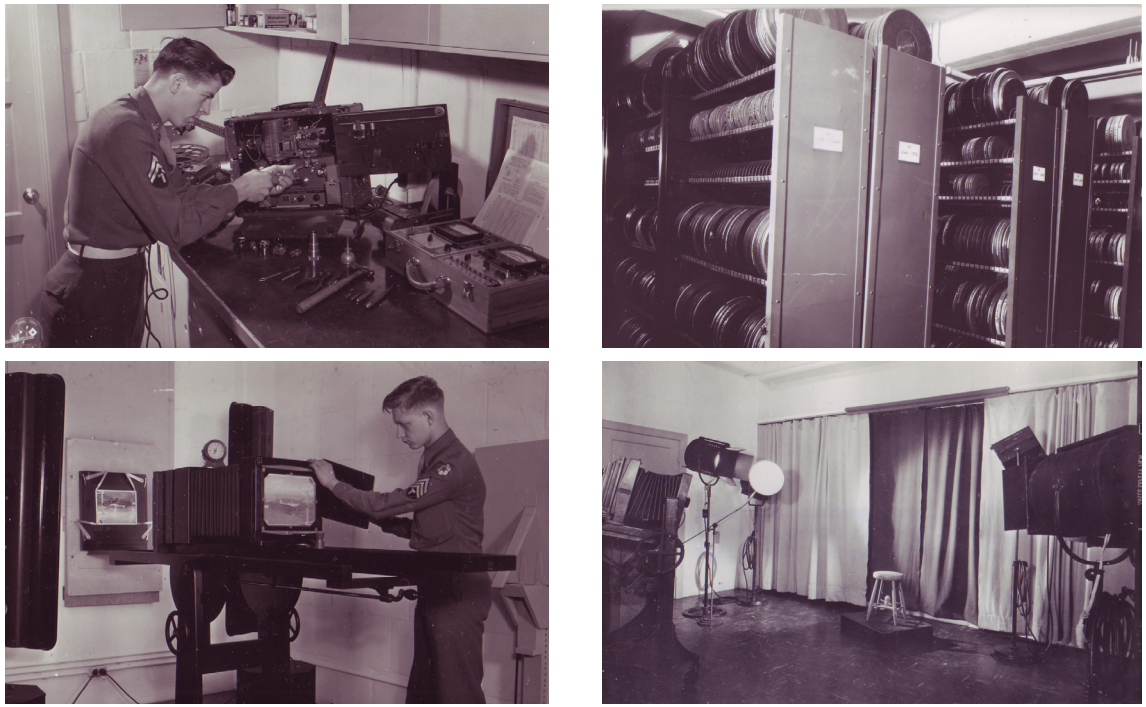


Figure 29
Building 603 (c.1948) as a photography laboratory, graphics and television studio. (National Archives and Records Administration)

In 2001, the Conservancy rehabilitated the building for use as a youth environmental education center, public interpretation facility, café and second floor offices (known as the Crissy Field Center). The Conservancy also replaced a wood shed located on the north loading dock with a glass enclosed addition and access to a new a second story deck on top of the new structure. The 2001 scope of work included a new interior stair connecting the first and second floors at the north side of the building, new partitions, new finishes throughout, new bathroom and elevator core in the southeast corner of the building, second floor skylight, all new structural and MEP systems, and the enlargement of several windows to accommodate new doors.

Figure 30
Building 603 (c.1948) as a photography laboratory, graphics and television studio. (San Francisco Chronicle)

HISTORIC BUILDING NUMBERS

1939-c.1945: #210
c.1945-Present: #603

HISTORIC USES

1939-1947	Commissary and Warehouse
1947-1999	Photographic laboratory, graphics and television studio
1999- 2009	Crissy Field Center
2009-Present	Temporary CalTrans Offices for the Doyle Drive Project

Figure 31
Building 603 (c.1981). (Department of the Interior)

BUILDING CHRONOLOGY

Text in *italics* taken from the 1993 Physical History Report; regular text indicates new information from additional research.

1939 *Building completed from $56,744.20. The office of the Quartermaster General in Washington D.C. prepared the plans and specifications for the structure. P.W.A. and the W.P.A. monies were used in the construction of the foundation of the structure ("Purchase and Hire" method). Robert E. McKee Company received the contract to construct the building proper.*

The contemporary description of the plans noted that the building consisted of "the salesroom office and storage space. There are approximately 4,700 square feet of storage space available. The building is on H section steel piles about 40 feet long. It is a reinforced concrete building with clay tile curtain walls."

The completion report noted much of the equipment that went into the structure: porcelain pull light receptacles; Young unit heaters and blast coils; an electric meter, main switch, and fuse box manufactured by Trumbull Electric Manufacturing of Los Angeles; plumbing equipment manufactured by Standard

Sanitary manufacturing; chrome finish wall mirrors; a gas storage tank with a thousand gallon capacity; and a hand operated elevator manufactured by Vincent Whitney Company of San Francisco (69 x 68 x 80 with a capacity of 2,000 lbs.).

The completion report stated that the commissary structure was [built] on "an old fill, and piles were necessary." Difficulties encountered during construction included a strike of housesmiths that resulted that resulted in a 21-day extension order, and in driving the piles for the building. The report stated "considerable difficulty was had in driving piles because of the metal junk that had been used as fill in the area."

1940 Natural Gas heaters installed in the building. Major alterations and additions completed to structure including: adding shelving and counters; moving special articles room; moving office from first to second floor; construction of new entrance porch; construction of new cashier's cage; laying linoleum in cashier's office. That same year one drinking fountain, one cabinet, and one electrical meter were installed in the structure.

1941-42 Additional shelving, racks, and partitions were constructed.

19-- Loading dock area on the north side of structure enclosed for additional office and storage spaces.

1947 Rehabilitated building to accommodate a photo developing lab, a projectionist school, a small auditorium and other multi-media functions. Alterations included removing all existing partitions except those for the boiler room, upstairs and downstairs lavatories, a demising wall on the second floor, and the elevator. The plans retained the spiral staircase. Both the first and second floors were built out with new partitions for the new use.

Five windows on the south side of the second floor and west of the men's lavatory were filled in with tile for a printing room and negatives room. A window on the first floor, directly beneath the printing room, was tiled in for two vaults.

1948 The building was dedicated as a photo lab.

The army dedicated the building with a plaque to Col. Melvin Gillette (1892-1947) that read: "Gillette Pictorial Center. Dedicated 1948 to the memory of the architect of military pictorial service Melvin E Gillette 1892 1947 Colonel Signal Corps United States Army"

The building's theatre was dedicated in honor of Ehram Brickell. The dedicating plaque read: "Brickell Theater-Dedicated 1948 to the memory of Ehram Brickell 1903-1945 Army Service employ audio-visual equipment coordinator World War II"

Both plaques were removed at an unknown date.

1957 New light fixtures added.

1966 Enlargement of existing auditorium to accommodate a *70-seat auditorium constructed in the southeast corner of the building*. Work included blocking four windows, one on the east elevation and three on the south, with concrete blocks.

19-- Fans, vents and louvers added to four windows on the west end of the south elevation of the second floor.

1977 New ventilation system and eye wash station in a group of rooms on the north side of the second floor. Alterations included replacing four fans and louvers in existing windows on the south elevation of the second floor with new fans and louvers.

1978 Sprinkler and security alarm systems added.

1993 Boiler replaced. All work performed in boiler room.

2001 Rehabilitation of building for the Crissy Field Center. Work included extending the front concrete steps and added a ramp for accessibility on the east elevation.

Converted existing windows into doors….

Multiple partitions removed and added throughout the building

Removed and replaced loading dock enclosure on north elevation

Interior access to boiler room added

2000 Transformer and transformer pad added at the southeast corner of the building.

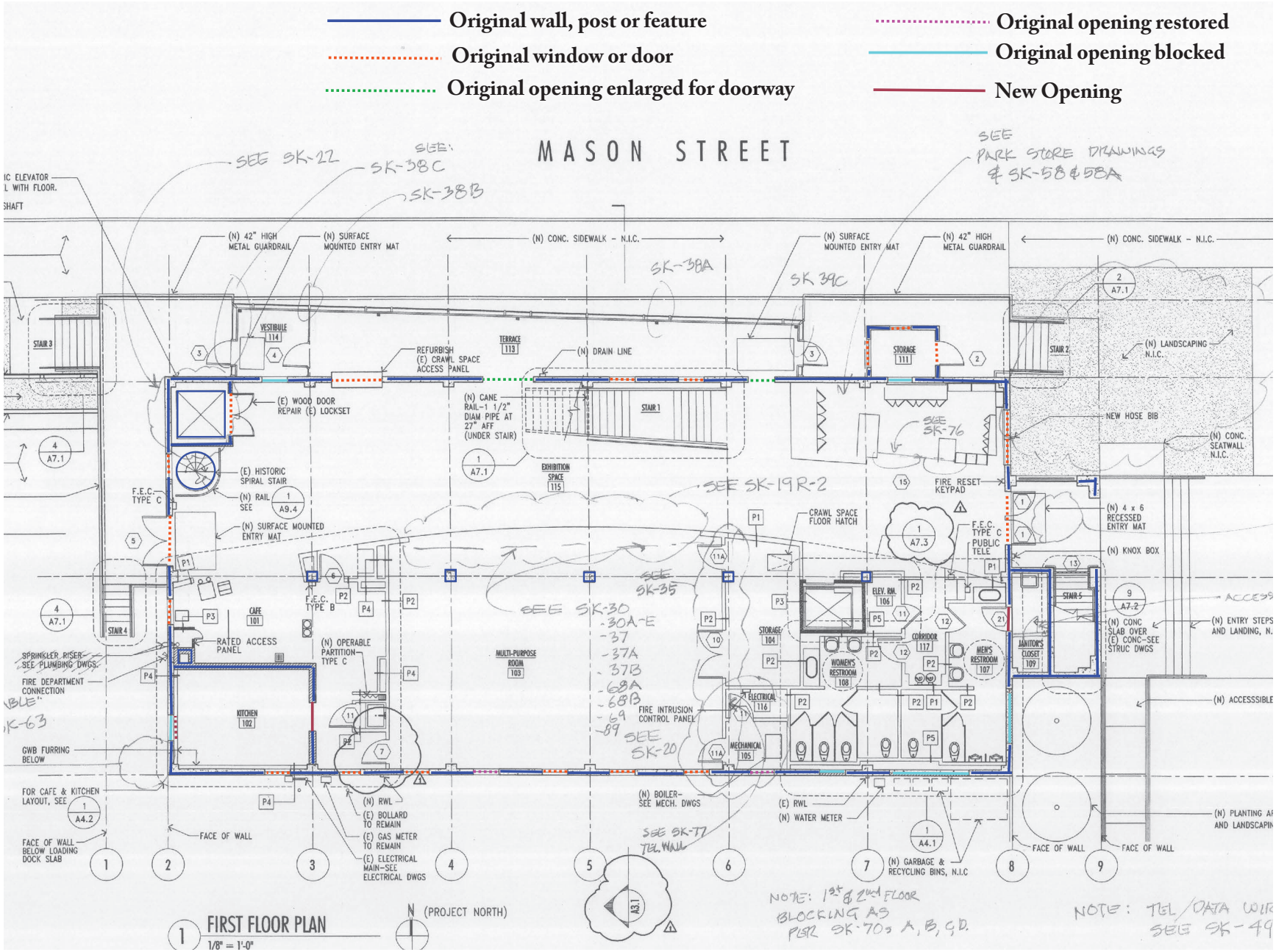


Figure 32

First floor plan of the Crissy Field Center for use as a youth environmental education center, public interpretation facility, café and second floor offices in 1999. (Golden Gate NRA, Park Archives)

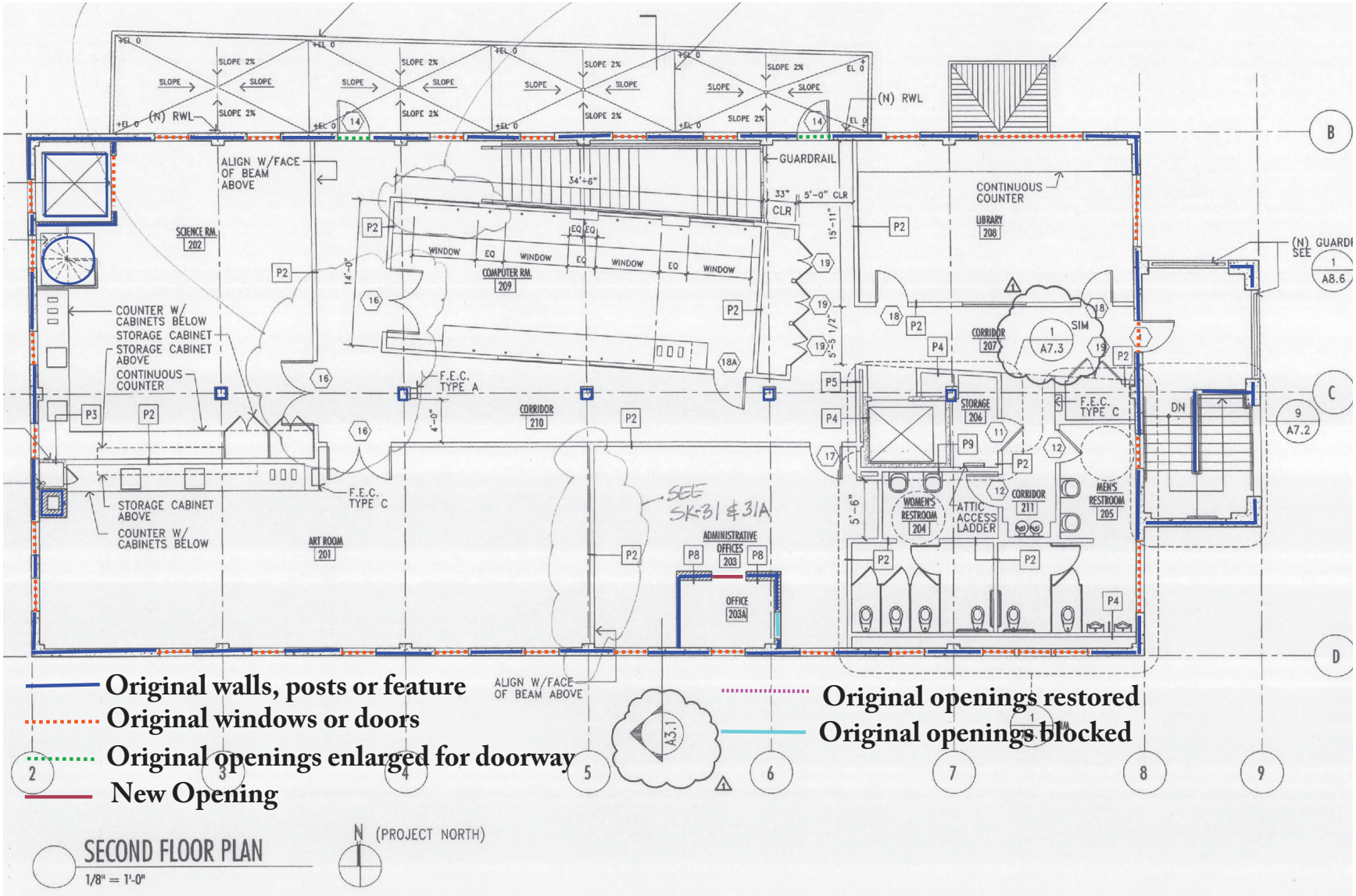


Figure 33

Second floor plan of the Crissy Field Center for use as a youth environmental education center, public interpretation facility, café and second floor offices in 1999. (Golden Gate NRA, Park Archives)

CHARACTER DEFINING FEATURES

Adapted from PHR – original text in *italics*.

Exterior

- *Building form, shape, materials, silhouette, symmetry*
- *Red-tile gable roof*
- *Wooden formwork impression (shuttering) visible in concrete*
- *Projecting two-story entrance porch to the east*
- *Metal industrial sash security windows (metal sash with exterior metal grilles shaped like mullions for security) usually nine or twelve light with central or upper two-thirds hinged*
- *Concrete loading dock, north and west elevations, with concrete steps*
- *Historic entrance doors, first and second floors (first floor paired; six light with one panel, three light transoms above; second floor single version of same) with historic door hardware*
- *Minimal eave overhang—eaves virtually flush with all walls*
- *Circular louvered vents in gable ends*
- *Square grid patterns in concrete railing, entrance porch*
- Brick chimney
- Exterior two-story staircase with metal gate at first floor

Later Exterior Additions and Non-Historic Modifications

- Loading dock enclosed in a sun-porch style addition
- 2nd floor deck and railing atop of the loading dock enclosure
- Skylight and mechanical equipment on roof

Interior

- *Partitions surrounding the men's room on the floor (historic)*
- Partitions around the former mechanical room, now kitchen, and those around the elevator
- Metal spiral staircase
- Elevator cab, shaft and mechanical system (currently mothballed)
- Sliding warehouse door, first floor north loading dock (currently concealed behind a wall)
- Bevel edges, window interiors
- Intact concrete flooring (first floor)
- Open floor plan (attributable to original Commissary and Warehouse construction)
- Square concrete columns

Later Interior Additions and Non-Historic Modifications

- Interior partitions (associated with the 2001 rehab)
- Interior staircase (associated with the 2001 rehab)
- Finishes and equipment associated with the café and commercial kitchen (installed after the 2001 rehab)

TREATMENT RECOMMENDATIONS

General

- The rehabilitation should comply with the ***Secretary of the Interior's Standards for Rehabilitation*** and the ***Presidio Trust Management Plan (PTMP)***, ***Mid-Crissy Area Design Guidelines***, and the ***Tunnel Tops Project Supplemental Design Guidelines***.
- Retain, repair, reuse or replace in kind all above-listed character defining features; relatively few original interior features remain, so those that do should be incorporated into the building's new program
- All additive forms or structures should be reversible or achieve minimal permanent impact to the historic building.
- Utilize glazed or partially glazed elements (transoms, glazed doors, sidelights) to help differentiate new interior partitions from historic walls.
- Consider removal of the glazed loading dock addition and restoration of the north elevation of the building, or replacing blue glass in addition with more compatible clear glass.

Site and Setting

- Maintain the loading dock and east porch as distinctive features; separate and/or minimize new ramps, decks or other access features so that they don't subsume or obscure the loading dock structure.
- Maintain exterior historic finishes and openings.
- Site any new construction to the south and west of the building, leaving the north, east and majority of the west elevations unencumbered by new construction.
- Introduction of any new openings should be limited to the south and west elevations, using existing window openings as cues for the dimension and scale.

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ATTACHMENT 5

SPECIAL-STATUS SPECIES THAT MAY OCCUR IN THE PROJECT AREA

JAMES CORNER FIELD OPERATIONS

SPECIAL-STATUS SPECIES THAT MAY OCCUR IN THE PROJECT AREA

For the purpose of this EA, special-status species include:

1. Species listed or proposed for listing as threatened or endangered under the federal Endangered Species Act (50 CFR 17.12 [listed plants], 17.11 [listed animals], and various notices in the Federal Register [FR] [proposed species]);
2. Species that are candidates for possible future listing as threatened or endangered under the federal Endangered Species Act (61 FR 40, February 28, 1996);
3. Species listed or proposed for listing by the State of California as threatened or endangered under the California Endangered Species Act (14 Cal. Code Regs. 670.5);
4. Species formerly designated by the USFWS as species of concern or species designated by the CDFW as species of special concern;[1]
5. Species designated as "special animals" by the state;[2]
6. Species designated as "fully protected" by the state (there are about 35, most of which are also listed as either endangered or threatened);[3]
7. Raptors (birds of prey), which are specifically protected by California Fish and Game Code Section 3503.5, thus prohibiting the take, possession, or killing of raptors and owls, their nests, and their eggs;[4]

[1] A California species of special concern is one that: has been extirpated from the state; meets the state definition of threatened or endangered but has not been formally listed; is undergoing or has experienced serious population declines or range restrictions that put it at risk of becoming threatened or endangered; and/or has naturally small populations susceptible to high risk from any factor that could lead to declines that would qualify it for threatened or endangered status.

[2] Species listed on the current CDFW "special animals" list (March 2015), which includes 900 species. This list includes species that CDFW considers "those of greatest conservation need." (CDFW 2015a)

[3] The "fully protected" classification was California's initial effort in the 1960s to identify and provide additional protection to those animals that were rare or faced possible extinction. The designation can be found in the Fish and Game Code.

[4] The inclusion of birds protected by Fish and Game Code Section 3503.5 is in recognition of the fact that these birds are substantially less common in California than most other birds, having lost much of their habitat to development, and that the populations of these species are therefore substantially more vulnerable to further loss of habitat and to interference with nesting and breeding than most other birds. It is noted that a number of raptors and owls are already specifically listed as threatened or endangered by State and federal wildlife authorities.

8. Plants listed as rare or endangered under the California Native Plant Protection Act (California Fish and Game Code, Section 1900 et seq.);

9. Plants considered by the CNPS to be "rare, threatened or endangered in California" under the California Rare Plant Ranking system (CNPR) which include Rank 1A, 1B, 2A, and 2B as well as Rank 3 and 4[5] plant species.

Lists of special-status plant and animal species that have the potential to occur within the project area for biological resources were compiled based on data contained in the CNDDB (2015), the USFWS My Project IPaC Trust Resource Report of Federal Endangered and Threatened Species that Occur in or may be Affected by the proposed project (USFWS 2015), and the CNPS Inventory of Rare and Endangered Plants for the North San Francisco and South San Francisco U.S. Geological Survey 7.5 minute topographical quadrangles (CNPS 2015a). Tables 5-1 and 5-2 present the special-status species, their status, their habitat requirements, and plant blooming periods, and considers the potential for each species to occur within the project area and the project site.

Based on review of the biological literature of the region, information presented in previous environmental documentation, and an evaluation of the habitat conditions of the project area, a species was designated as "absent" if: 1) the species' specific habitat requirements are not present, or 2) the species is presumed, based on the best scientific information available, to be extirpated from the project area or region. A species was designated as having a "low potential" for occurrence if: 1) its known current distribution or range is outside of the project area, or 2) only limited or marginally suitable habitat is present within the project area. A species was designated as having a "moderate potential" for occurrence if: 1) there is low to moderate quality habitat present within the project area or immediately adjacent areas, or 2) the project area is within the known range of the species, even though the species was not observed during reconnaissance surveys. A species was designated as having a "high potential" for occurrence if: 1) moderate to high quality habitat is present within the project area, and 2) the project area is within the known range of the species.

Special-status fish, marine mammals, and crustaceans were not included in Table 5-2 as the project area does not contain their respective habitats.

[5] Rank 3 plants may be analyzed under if sufficient information is available to assess potential impacts to such plants. Factors such as regional rarity vs. statewide rarity should be considered in determining whether cumulative impacts to a Rank 4 plant are significant even if individual project impacts are not. CRPR Rank 3 and 4 may be considered regionally significant if, e.g., the occurrence is located at the periphery of the species' range, or exhibits unusual morphology, or occurs in an unusual habitat/substrate. For these reasons, CRPR Rank 3 and 4 plants should be included in the special-status species analysis. Rank 3 and 4 plants are also included in the CNDDB Special Vascular Plants, Bryophytes, and Lichens List. The current online published list is available at: http://www.dfg.ca.gov/biogeodata (CDFW 2015b).

5-1: SPECIAL-STATUS PLANT SPECIES THAT MAY OCCUR IN THE PROJECT AREA

Common Name *Scientific Name*	Listing Status USFWS/ CDFW/CRPR	Habitat Requirements / Blooming Period	Potential Species Occurrence in the Project Area	Potential Species Occurrence in the Project Site
PLANT SPECIES LISTED OR PROPOSED FOR LISTING				
Franciscan Manzanita *Arctostaphylos franciscana*	FE/--/1B.1	Serpentine outcrops in chaparral and serpentinite coastal scrub. February-April	**Absent.** Former San Francisco area endemic, This species was believed to be extinct in the wild (although still extant through cultivation), but was rediscovered in Presidio In late 2009. No suitable habitat within the project area.	**Absent.** No suitable habitat present within the project site.
Presidio Manzanita *Arctostaphylos hookeri* ssp. *ravenii*	FE/CE/1B.1	Chaparral, coastal prairie and coastal scrub; rocky serpentine slopes. February-March	**Absent.** Former San Francisco area endemic; limited in wild to one plant and clones on serpentine bluff above Baker's beach.	**Absent.** No suitable habitat present within the project site.
Marsh sandwort *Arenaria paludicola*	FE/CE/1B.1	Marshes and swamps. Grows up through dense mats of typha, juncus and schoenoplectus. May-August	**Absent.** Presumed extirpated from the Presidio and San Francisco County.	**Absent.** No suitable habitat present within the project site.
Presidio clarkia *Clarkia franciscana*	FE/CE/1B.1	Serpentine outcrops in coastal scrub or valley and foothill grassland. May-July	**Absent.** Occurrences and habitat occur in the greater Presidio but not within the project area.	**Absent.** No suitable habitat present within the project site.
Marin western flax *Hesperolinon congestum*	FT/CT/1B.1	Chaparral and valley/foothill grassland; serpentine soils. April-July	**Low.** Known to occur in dry, serpentine scrub and grassland slopes in the Presidio. No suitable habitat within the project area.	**Absent.** No suitable habitat present within the project site.

Common Name *Scientific Name*	Listing Status USFWS/ CDFW/CRPR	Habitat Requirements / Blooming Period	Potential Species Occurrence in the Project Area	Potential Species Occurrence in the Project Site
Beach layia *Layia carnosa*	FE/CE/1B.1	Coastal dunes. May-July	**Absent.** Recorded generally from sand dunes in San Francisco in 1904; may be present in the seed bank. Possibly extirpated from San Francisco County.	**Absent.** No suitable habitat present within the project site.
San Francisco lessingia *Lessingia germanorum*	FE/CE/1B.1	Open sandy soils of remnant dunes in coastal scrub. June-November	**Present.** Known to occur on open sandy soils and is only known from San Francisco and San Mateo counties. Occurs at Crissy Marsh.	**Absent.** No suitable habitat present within the project site.
White-rayed pentachaeta *Pentachaeta bellidiflora*	FE/CE/1B.1	Open dry rocky slopes and grassland, often on soils derived from serpentinite. March-May	**Absent.** Occurrences and habitat occur in the greater Presidio but not within the project area.	**Absent.** No suitable habitat present within the project site.
San Francisco popcorn flower *Plagiobothrys diffusus*	--/CE/1B.1	Coastal prairie; grassland with marine influence. April-June	`Historically documented in the Presidio but presumed extirpated from San Francisco County.	**Absent.** No suitable habitat present within the project site.
Adobe sanicle *Sanicula maritima*	--/CR/1B.1	Occurs in meadows and seeps. Generally associated with clayey or ultramafic soils. April-May	**Absent.** No suitable habitat present; presumed extirpated from the area.	**Absent.** No suitable habitat present within the project site.
CNPS CALIFORNIA RARE PLANT RANK SPECIES				
Alkali milk-vetch *Astragalus tener* var. *tener*	--/--/1B.2	Low ground, alkali flats, and flooded lands. March-June	**Absent.** Presumed extirpated in San Francisco; no suitable habitat within the Presidio;	**Absent.** No suitable habitat present within the project site.
Salt marsh owl's clover *Castilleja ambigua* ssp. *ambigua*	--/--/4.2/LS	Salt marshes. May-August	**Present.** Occurs at Crissy Marsh.	Absent. No suitable habitat present within the project site.

Common Name *Scientific Name*	Listing Status USFWS/ CDFW/CRPR	Habitat Requirements / Blooming Period	Potential Species Occurrence in the Project Area	Potential Species Occurrence in the Project Site
Point Reyes bird's-beak *Chloropyron maritimum* ssp. *palustre*	--/-- 1B.2	Upper zones of coastal salt marsh. May-September	**Present.** Reintroduced at Crissy Marsh.	**Absent.** No suitable habitat present within the project site.
San Francisco spineflower *Chorizanthe cuspidata* var. *cuspidata*	--/--/1B.2	Sandy terraces and slopes of coastal bluff scrub, coastal dunes, coastal prairie and coastal scrub. April-August	**Present.** Coastal scrub and dune habitat is found in the project area at Crissy Marsh. All Presidio records are from the southern portion of the park. Reintroduced at Crissy Field.	**Absent.** No suitable habitat present within the project site.
Franciscan thistle *Cirsium andrewsii*	--/--/1B.2	Coastal bluff scrub, serpentine habitats in moist sites. June-July	**Low.** Documented in the Presidio outside of the project area.	**Absent.** No suitable habitat present within the project site.
Round-headed Chinese-houses *Collinsia corymbosa*	--/--/1B.2	Coastal dunes and coastal prairie. April-June	**Low.** Documented in the Presidio but not within the project area. Could occur within suitable habitat at Crissy Marsh.	**Absent.** No suitable habitat present within the project site.
San Francisco collinsia *Collinsia multicolor*	--/--/1B.2	Closed-cone coniferous forests, coastal scrub, sometimes on serpentinite derived soils. March-May	**Absent.** Documented in San Francisco outside of the Presidio.	**Absent.** No suitable habitat present within the project site.
San Francisco wallflower *Erysimum franciscanum*	--/--/4.2/LS	Northern foredune, northern coastal scrub, northern coastal bluff scrub, central dune scrub. March-June	**Present.** Observed at Crissy Marsh.	**Absent.** No suitable habitat present within the project site.
Fragrant fritillary *Fritillaria liliacea*	--/--/1B.2	Coastal bluff scrub, coastal scrub, valley and foothill grassland; clayey soils, often serpentinite. February-April	**Absent.** Historically present in San Francisco though not documented in the project area.	**Absent.** No suitable habitat present within the project site.

Common Name *Scientific Name*	Listing Status USFWS/ CDFW/CRPR	Habitat Requirements / Blooming Period	Potential Species Occurrence in the Project Area	Potential Species Occurrence in the Project Site
blue coast gilia *Gilia capitata* ssp. *chamissonis*	--/-- /1B.1	Coastal sand dunes and openings of coastal dune scrub. May-July	**Present.** Occurs at Crissy Marsh in dune habitat at Crissy Field.	**Absent.** No suitable habitat present within the project site.
San Francisco gumplant *Grindelia hirsutula* var. *maritima*	--/--/3.2	Coastal bluff scrub, coastal scrub, valley and foothill grassland; slopes with sandy or serpentine soils. August-September	**Moderate.** Suitable habitat present at Crissy Marsh.	**Absent.** No suitable habitat present within the project site.
Kellogg's horkelia *Horkelia cuneata* ssp. *sericea*	--/--/1B.1	In openings of closed-coned coniferous forest, coastal scrub, maritime chaparral; sandy or gravelly soils. April-September	**Absent.** Documented in the Presidio but not within the project area.	**Absent.** No suitable habitat present within the project site.
Rose leptosiphon *Leptosiphon rosaceus*	--/--/1B.1	Coastal bluff scrub. April-June	**Absent.** Historically documented from the area but currently thought to be extirpated from the San Francisco North quadrangle.	**Absent.** No suitable habitat present within the project site.
Marsh microseris *Microseris paludosa*	--/--/1B.2	Wet areas in a variety of habitats, including coastal scrub and valley and foothill grassland. April-June	**Absent.** Limited suitable habitat present in project area. Thought to be extirpated from the San Francisco North quadrangle.	**Absent.** No suitable habitat present within the project site.
Northern curly-leaved monardella *Monardella sinuata* ssp. *nigrescens*	--/--/1B.2	Dunes, sandy soils in sagebrush scrub; Contra Costa and San Francisco Counties. May-September	**Low.** Limited suitable habitat present in project area.	**Absent.** No suitable habitat present within the project site.
Choris's popcorn-flower *Plagiobothrys chorisianus* var. *chorisianus*	--/--/1B.2	Chaparral, coastal prairie, coastal scrub, on mesic sites. March-June	**Absent.** Occurred historically at the Presidio but thought to be extirpated.	**Absent.** No suitable habitat present within the project site.

Common Name *Scientific Name*	Listing Status USFWS/ CDFW/CRPR	Habitat Requirements / Blooming Period	Potential Species Occurrence in the Project Area	Potential Species Occurrence in the Project Site
San Francisco campion *Silene verecunda* ssp. *verecunda*	--/--/1B.2	Coastal habitats (scrub, prairie, bluff scrub), grassland and chaparral; sandy to mudstone or shale soils. March-August	**High.** Occurs in coastal dune scrub and documented at Crissy Field. Suitable habitat is present in the project area.	**Absent.** No suitable habitat present within the project site.
California seablite *Suaeda californica*	--/--/1B.1	Margins of coastal saltmarshes. July- October	**Present.** Reintroduced to Crissy Marsh.	**Absent.** No suitable habitat present within the project site.
San Francisco owl's clover *Triphysaria floribunda*	--/--/1B.2	Coastal prairie and scrub, valley and foothill grassland; often on serpentine soils. April-June	**Low.** Documented in Presidio but not within the project area. Could occur in coastal scrub habitat of the project area.	**Absent.** No suitable habitat present within the project site.
LOCALLY SIGNIFICANT SPECIES				
Nuttall's milk-vetch *Astragalus nuttallii* var. *virgatus*	--/--/LS	Open bluffs, dunes, and sandy areas. January-November	**Moderate.** Historically documented in the Presidio. Reintroduced at Crissy Field. Could occur in suitable habitat within the project area.	**Absent.** No suitable habitat present within the project site.
California saltbush *Atriplex californica*	/--/LS	Salt marsh April-November	**Present.** Reintroduced at Crissy Marsh.	**Absent.** No suitable habitat present within the project site.
California goosefoot *Chenopodium californicum*	--/--/LS	Generally open sites; sandy to clay soils. March-June	**Present.** Reintroduced at Crissy Marsh.	**Absent.** No suitable habitat present within the project site.
California croton *Croton californicus*	--/--/LS	Sandy soils, dunes and washes. June-September	**Present.** Reintroduced in dune habitat at Crissy Field. Could occur in suitable habitat within the project area.	**Absent.** No suitable habitat present within the project site.

Common Name *Scientific Name*	Listing Status USFWS/ CDFW/CRPR	Habitat Requirements / Blooming Period	Potential Species Occurrence in the Project Area	Potential Species Occurrence in the Project Site
Dune tansy *Tanacetum camphoratum*	--/--/LS	Coastal dunes. June-September	**Present.** Reintroduced to Crissy Marsh	**Absent.** No suitable habitat present within the project site.

Status Codes:

Federal Categories (U.S. Fish and Wildlife Service)

FE = Listed as "endangered" under the federal Endangered Species Act
FT = Listed as "threatened" under the federal Endangered Species Act
FPD = Proposed delisted
FD = Delisted
FC = Federal Candidate
-- No listing status

State Categories (California Department of Fish and Game)

CE = Listed as "Endangered" under the California Endangered Species Act
CT = Listed as "Threatened" under the California Endangered Species Act
CR = Listed as "Rare" by the State of California
SSC = CDFW designated "Species of Special Concern"
CFP = CDFW designated "Fully Protected"
SC = CDFW designated "candidate threatened"
WL = CDFW designated "watch list"

California Rare Plant Rank (CRPR)

Rank1A = Plants presumed extirpated in California and either rare or extinct elsewhere.
Rank 1B = Plants rare, threatened, or endangered in California and elsewhere
Rank 2A = Plants presumed extirpated in California, but more common elsewhere.
Rank 2B = Plants rare, threatened, or endangered in California but more common elsewhere.
Rank 3 = Plants about which more information is needed
Rank 4 = Plants of limited distribution
An extension reflecting the level of threat to each species is appended to each rarity category as follows:
.1 – Seriously endangered in California.
.2 – Fairly endangered in California.
.3 – Not very endangered in California.
LS = Locally Significant Plant Species for San Francisco County as designated by the CNPS Yerba Buena Chapter

TABLE 5-2: SPECIAL-STATUS ANIMAL SPECIES THAT MAY OCCUR IN THE PROJECT AREA

Common Name *Scientific Name*	Listing Status USFWS/CDFW	Habitat Requirements / Period of Identification	Potential Species Occurrence in the Project Area	Potential Species Occurrence in the Project Site
FEDERAL AND STATE LISTED ANIMAL SPECIES				
Invertebrates				
Bay checkerspot butterfly *Euphydryas editha bayensis*	FT/--	Native grasslands on serpentine soils in San Francisco Bay area. Host plants: Plantago erecta (primary); Castilleja densiflorus and C. exserta Period of identification: March - May	**Absent.** Only one record in San Francisco area- a colony at Twin Peaks which disappeared in the 1970's.	**Absent.** No suitable habitat. Host plants absent in project site.
Mission blue butterfly *Plebejus icarioides missionensis*	FE/--	Grasslands and coastal scrub with larval food plants (Lupinus albifrons, L. variicolor and L. formosus) Period of identification: March-June (adults)	**Low potential.** Primarily known from San Mateo County, but occurs at Twin Peaks in San Francisco, and at the north end of Golden Gate Bridge in Marin County.	**Absent.** No suitable habitat occurs in the project site.
San Bruno elfin butterfly *Callophrys mossii bayensis*	FE/--	Coastal scrub and bunchgrass grassland habitats, with larval foodplant, Sedum spathulifolium; adults nectar on Lomatium utriculatum, Achillea millefolium, Arabis blepharophylla, Erysimum franciscanum, Ranunculus californicus, and Fragaria californica Period of Identification: March-April	**Absent.** All known populations from San Mateo County. No nearby sightings.	**Absent.** All known populations from San Mateo County. No nearby sightings.
Reptiles				
San Francisco garter snake *Thamnophis sirtalis tetrataenia*	FE/CE, CFP	Densely vegetated ponds near open hillsides with abundant small mammal burrows.	**Absent.** No suitable habitat within the project area.	**Absent.** No suitable habitat within the project site.

Common Name *Scientific Name*	Listing Status USFWS/CDFW	Habitat Requirements / Period of Identification	Potential Species Occurrence in the Project Area	Potential Species Occurrence in the Project Site
Amphibians				
California red-legged frog *Rana draytonii*	FT/SSC	Breed in stock ponds, pools, and slow-moving streams	**Absent.** No suitable habitat within the project area.	**Absent.** No suitable habitat within the project site.
Birds				
Western snowy plover *Charadrius alexandrinus nivosus*	FT/SSC	Sandy beaches on marine and estuarine shores - requires sandy, gravely, or friable soils for nesting Period of identification: Year-round	**No nesting potential.** Uncommon winter visitor to Crissy Marsh and beach.	**No nesting potential.** No suitable habitat within the project site.
Short-tailed albatross *Phoebastria albatrus*	FE/SSC	A pelagic species that spends most of its time at sea and returns to land only for breeding purposes.	**No nesting potential.** Breeds only at one or two sites off the coast of Japan, occasional visitor to California coast.	**No nesting potential.** No suitable habitat within the project site.
Willow flycatcher *Empidonax traillii* (nesting)	--/CE	Large willow riparian forest along rivers and streams Period of identification: Spring and fall	**Very Low nesting potential.** Uncommon spring and fall migrant at Lobos Creek and Mountain Lake within the Presidio. Willow riparian not extensive enough in project area therefore no suitable habitat. Not known to breed in San Francisco.	**No nesting potential.** No suitable habitat within the project site.
American peregrine falcon *Falco peregrinus anatum*	FD/CFP	Nests in cliffs and outcrops usually adjacent to lakes Period of identification: Year-round	**No nesting potential.** Uncommon nonbreeding resident in the project area.	**No nesting potential.** Uncommon nonbreeding resident.
Bald eagle *Haliaeetus leucocephalus* (nesting and wintering)	FD/CE, CFP	Nests and forages on inland lakes, reservoirs, and rivers Period of identification: Fall	**No nesting potential.** Rare fall migrant potentially in project area.	**No nesting potential.** No suitable habitat within the project site.

Common Name *Scientific Name*	Listing Status USFWS/CDFW	Habitat Requirements / Period of Identification	Potential Species Occurrence in the Project Area	Potential Species Occurrence in the Project Site
California black rail *Laterallus jamaicensis coturniculus*	--/CT, CFP	Nests and forages in tidal emergent wetland with pickleweed Period of identification: Year-round	**No nesting potential.** No suitable habitat present.	**No nesting potential.** No suitable habitat present.
Brown pelican *Pelecanus occidentalis californicus*	FD/CD, CFP	Forages in open water – roosting in flatlands such as berms and islands Period of identification: Winter	**No nesting potential.** Regular visitor in shore areas of Presidio. Roosts, bathes and forages at Crissy Marsh.	**No nesting potential.** Do not breed in San Francisco Bay.
Ridgway's rail *Rallus obsoletus obsoletus*	FE/CE, CFP	Nests and forages in dense emergent wetland with pickleweed, cordgrass, and bulrush Period of identification: Year-round	**Absent.** No suitable habitat present.	**Absent.** No suitable habitat present in the project site.
Bank swallow *Riparia riparia*	--/CT	A colonial nester. Nests in vertical banks of dirt or sand near water.	**No nesting potential.** No suitable nesting habitat present. In San Francisco known only to nest at Fort Funston.	**Absent.** No suitable habitat occurs in the project site.
California least tern *Sterna antillarum browni* (nesting colony)	FE/CE, CFP	Nests along the coast from San Francisco Bay south to northern Baja California - colonial breeder on bare or sparsely vegetated flat substrates including sand beaches, alkali flats, land fills, or paved areas Period of identification: Fall	**No nesting potential.** Rare non-breeding fall transient to Crissy Marsh.	**Absent.** No suitable habitat occurs in the project site.
Mammals				
Salt marsh harvest mouse *Reithrodontomys raviventris*	FE/CE, CFP	Saline emergent marsh with dense pickleweed Period of identification: Year-round	**Absent.** No suitable habitat present in project area.	**Absent.** No suitable habitat present in project site.

Common Name *Scientific Name*	Listing Status USFWS/CDFW	Habitat Requirements / Period of Identification	Potential Species Occurrence in the Project Area	Potential Species Occurrence in the Project Site
OTHER SPECIAL STATUS SPECIES				
Reptiles				
Silvery legless lizard *Anniella pulchra pulchra*	--/SSC	Areas with sandy or loose loamy soils under open vegetation near beaches, chaparral, or pine-oak woodland Period of identification: April-September	**Low potential.** Considered extirpated from Presidio. Project area does not provide suitable habitat for this species.	**Absent.** No suitable habitat occurs in the project site.
Western pond turtle *Emmys marmorata*	--/SSC	Lakes, ponds, reservoirs, and slow-moving streams and rivers, primarily in foothills and lowlands Period of identification: Year-round	**Absent.** No suitable habitat present in project area.	**Absent.** No suitable habitat present in project site.
Birds				
Tricolored blackbird *Agelaius tricolor* (nesting colony)	--/CE, SSC	Nests in freshwater marshes with dense stands of cattails or bulrushes, occasionally in willows, thistles, mustard, blackberry brambles, and dense shrubs and grains Period of identification: Year-round	**Low potential.** Suitable habitat considered too fragmented within the Presidio. No suitable habitat within the project area.	**Absent.** No suitable habitat present in project site.
Vaux's swift *Chaetura vauxi*	--/SSC	Nests in hollow, burned-out tree trunks in large conifers Period of identification: Fall/ Spring	**No nesting potential.** Rare to uncommon seasonal migrant that does not breed locally.	**No nesting potential.** Rare to uncommon seasonal migrant that does not breed locally.
olive-sided flycatcher *Contopus cooperi*	BCC/SSC	Nests in open conifer forest and woodland habitats.	**Present.** Known to breed in the Presidio. Suitable habitat is present in the project area.	**Moderate potential.** Suitable nesting habitat is present in the project site.

Common Name *Scientific Name*	Listing Status USFWS/CDFW	Habitat Requirements / Period of Identification	Potential Species Occurrence in the Project Area	Potential Species Occurrence in the Project Site
yellow warbler *Dendroica petechia brewsteri*	BCC/SSC	Nests in riparian areas dominated by willows, cottonwoods, sycamores, alders, or mature chaparral; may use urban areas near waterways Period of identification: April-June	**Low nesting potential.** Uncommon seasonal migrant; not known to breed at Presidio. Could occur in willows of the project area.	**Absent.** No suitable habitat occurs in the project site.
San Francisco common yellowthroat *Geothlypis trichas sinuosa*	BCC/SSC	Nests in fresh and saltwater marshes, needs thick continuous cover down to water surface for foraging Period of identification: April-July	**Low nesting potential.** Uncommon resident and possible breeder at Mountain Lake outside of project area.	**Absent.** No suitable habitat occurs in the project site.
California gull *Larus californicus* (nesting colony)	--/WL	Colonial nester on islets in large interior lakes either fresh or strongly alkaline. Period of identification: Fall-spring	**Low nesting potential.** Common nonbreeding visitor in fall, winter and spring; occurs at Crissy Marsh mudflats.	**No nesting potential.** Common nonbreeding visitor.
Long-billed curlew *Numenius americanus*	--/WL	Breeds in upland shortgrass prairies and wet meadows in northeastern California in gravelly soils. Period of identification: Winter	**No nesting potential.** Uncommon winter visitor to sandy beaches and mudflats at Crissy Marsh.	**Absent.** No suitable habitat occurs in the project site.
Double-crested cormorant *Phalacrocorax auritus* (rookery site)	--/WL	Forages in a variety of habitats and nests in riparian forests or on protected islands. Period of identification: Year-round	**No nesting potential.** Common nonbreeding resident at Crissy Marsh.	**Absent.** No suitable habitat occurs in the project site.
Black skimmer *Rynchops niger* (nesting colony)	--/SSC	Requires shallow, calm water for foraging, and sand bars, beaches, or dikes for roosting and nesting. Period of identification: Spring-Summer	**Low potential.** Rare visitor to Bay Area that does not breed locally.	**Absent.** No suitable habitat occurs in the project site.
Allen's hummingbird *Selasphorus sasin*	BCC/--	Brush and woodlands. Period of identification: Winter – Summer	**Present.** Known to nest at the Presidio and likely to nest in the project area.	**High potential.** May nest in landscape scrub within the project site.

Common Name *Scientific Name*	Listing Status USFWS/CDFW	Habitat Requirements / Period of Identification	Potential Species Occurrence in the Project Area	Potential Species Occurrence in the Project Site
Mammals				
Pallid bat *Antrozous pallidus*	--/SSC	Day roosts are mainly in caves, crevices and mines; also found in buildings and under bark. Forages in open lowland areas. Period of identification: February-August	**Low potential.** Occurrence at Presidio is unlikely.	**Low Potential.** Occurrence at Presidio is unlikely.
western mastiff bat *Eumops perotis californicus*	--/SSC	Needs rock crevices, grassland, coastal scrub; may use urban areas. Period of identification: February-August	**Low potential.** Roosting habitat considered poor; occurrence at Presidio is unlikely.	**Low potential.** Roosting habitat considered poor; occurrence at Presidio is unlikely.
western red bat *Lasiurus blossevillii*	--/SSC	Roosts primarily in trees, 2-40 feet above ground, from sea level up through mixed conifer forests. Prefers habitat edges and mosaics with trees that are protected from above and open below with open areas for foraging.	**Moderate potential.** Suitable habitat is present in mature trees the project area.	**Moderate potential.** Suitable habitat is present in the project site within the Historic Forest.
San Francisco dusky-footed woodrat *Neotoma fuscipes annectens*	--/SSC	Forests with moderate canopy cover and brushy understory. Period of identification: Year-round	**Low potential.** Marginal habitat occurs in the project area.	**Absent.** No suitable habitat occurs in project site.
Townsend's big-eared bat *Corynorhinus townsendii*	--/SC,SSC	Roosts in caves, mines, buildings or other human-made structures for roosting. Forages in open lowland areas. Period of identification: February-August	**Low potential.** Roosting habitat considered poor; occurrence at Presidio is unlikely.	**Low potential.** Roosting habitat considered poor; occurrence at the project site is unlikely.

Common Name *Scientific Name*	Listing Status USFWS/CDFW	Habitat Requirements / Period of Identification	Potential Species Occurrence in the Project Area	Potential Species Occurrence in the Project Site
		SPECIES ON OTHER LISTS		
Invertebrates				
Monarch butterfly *Danaus plexippus* (wintering sites)	--/*	Eucalyptus groves (winter sites). Period of identification: Winter	**Low potential.** Few eucalyptus trees remain in the project area. Wintering sites not previously documented in the project area.	**Absent.** No suitable habitat occurs in project site.
Birds				
Cooper's hawk[6] *Accipiter cooperi*	--/-3503.5	Deciduous, coniferous, or riparian woodlands or forests. Nests in large conifers or deciduous trees. Period of identification: Year-round	**Present.** Known to nest at the Presidio.	**Low potential.** Potentially nests in suitable vegetation within the project site however human presence in this area may act as deterrence.
Great horned owl *Bubo virginianus*	--/3503.5	Coniferous or deciduous forests and woodlands, parks. Often uses stick nests abandoned by corvids or other raptors. Nests in large trees, including eucalyptus and pines. Period of identification: Year-round	**Present.** Known to nest at the Presidio.	**Low potential.** May nest in Historic Forest within the project site however human presence in this area may act as deterrence.
Red-tailed hawk *Buteo jamaicensis*	--/3503.5	Open stands of deciduous and coniferous forests; frequents croplands and pastures Period of identification: Year-round	**Present.** Potentially nests in mature trees within project area.	**Moderate potential.** May nest in Historic Forest within the project site however human presence in this area may act as deterrence.

[6] Nesting raptors (hawks, falcons, and owls) are protected under California Fish and Game Code Section 3503.5

Common Name *Scientific Name*	Listing Status USFWS/CDFW	Habitat Requirements / Period of Identification	Potential Species Occurrence in the Project Area	Potential Species Occurrence in the Project Site
Red-shouldered hawk *Buteo lineatus*	--/3503.5	Dense riparian woodland, hardwood-conifer habitats adjacent to swamps, marshes, and wet meadow Period of identification: Year-round	**Present.** Potentially nests in mature trees within project area.	**Low potential.** May nest in Historic Forest within the project site however human presence in this area may act as deterrence.
American kestrel *Falco sparverius*	--/3503.5	Generally nests in cavities in large snags or on cliffs. Requires open to semi-open habitat for foraging. Period of identification: Year-round	**Present.** Uncommon to rare breeder at the Presidio but may forage in the project area.	**Low potential.** May nest in Historic Forest within the project site however human presence in this area may act as deterrence.
Western screech-owl *Megascops kennicottii*	--/3503.5	Woodland, especially oak and riparian, and scrub habitats. Cavity nester, generally in snags.	**Present.** Last known San Francisco population occurs at Presidio, breeding not confirmed.	**Low potential.** May nest in Historic Forest within the project site however human presence in this area may act as deterrence.
Mammals				
hoary bat *Lasiurus cinereus*	--/*	Prefers open habitats or habitat mosaics, with access to trees for cover and open areas or habitat edges for feeding. Roosts in dense foliage of medium to large trees. Feeds primarily on moths; requires water.	**Moderate potential.** Suitable roosting habitat potentially in Historic Forest trees in project area. Species previously documented in the Presidio.	**Moderate potential.** Suitable roosting habitat potentially in Historic Forest trees in project site.

Common Name *Scientific Name*	Listing Status USFWS/CDFW	Habitat Requirements / Period of Identification	Potential Species Occurrence in the Project Area	Potential Species Occurrence in the Project Site
Yuma myotis *Myotis yumanensis*	--/*	Roosts in caves, old buildings and under bark. Forms maternity colony in the spring. Period of identification: August – October, January – February	**High potential.** Documented in the Presidio. Suitable roosting habitat potentially in Historic Forest trees in project area.	**High potential.** Suitable roosting habitat potentially in Historic Forest trees in project site and vacant buildings.

Status Codes:

Federal Categories (U.S. Fish and Wildlife Service)

FE = Listed as Endangered by the Federal Government
FT = Listed as Threatened by the Federal Government
FD = Federal Delisted; status monitored for five years
FC = Federal Candidate
BCC = Federal Bird of Conservation Concern
-- No listing status

State Categories (California Department of Fish and Wildlife)

CE = Listed as Endangered by the State of California
CT = Listed as Threatened by the State of California
CR = Listed as Rare by the State of California
SSC = Species of Special Concern
CFP = Fully Protected by the State of California
SC = State Candidate
CD = California Delisted
** = California Natural Diversity Database Special Animals List*

Source: CDFW 2015a; CDFW 2015b; CNPS 2015a; CNPS 2015b; CNDDB 2015; eBird 2015; ESA 2015; Jones and Stokes Associates 1997; Krauel 2009; Presidio Trust 2010c; Presidio Trust and NPS 2001; San Francisco Field Ornithologists 2003; USFWS 2015; Wood Biological Consulting 2014.

ATTACHMENT

6

RESPONSES TO COMMENTS RECEIVED ON THE PRESIDIO TUNNEL TOPS EA

RESPONSES TO COMMENTS RECEIVED ON THE PRESIDIO TUNNEL TOPS EA

The Trust made the EA available for public review on October 28, 2015 (Trust 2015e). The Trust's announcements invited public comment for a 45-day period, which was extended by 36 days (concluding January 19, 2016) in response to public comment (Trust 2015f). During the public comment period, the Trust held two informational workshops on November 4 and December 3, 2015 to provide participants the opportunity to learn more about the project and issues covered in the EA, and to provide comments. Additionally, the Trust offered eight site tours between October 30, 2015 and January 15, 2016.

By the close or shortly after the public comment period for the project that ended January 19, 2016, the Trust received three letters, five emails and four comment cards from 10 interested individuals, two organizations and one public agency (see table below).[1] Several of the comments were nonsubstantive, generally expressing support for the project, and therefore required no response.

INDIVIDUALS, ORGANIZATIONS AND PUBLIC AGENCIES SUBMITTING COMMENTS ON THE PRESIDIO TUNNEL TOPS ENVIRONMENTAL ASSESSMENT

Individuals

Molly Cargas
Whit Hall
Raymond Holland
Amy Meyer
Dale and Gloria Telegan
Sharon Tsiu
Xiluo Wang
Georgeanne Wedergren
Paul Wermer

Organizations

Golden Gate Audubon Society
Neighborhood Associations for Presidio Planning

Public Agencies

United States Department of the Interior, National Park Service, Golden Gate National Recreation Area

Comment letters are available for review at the Presidio Trust and constitute part of the formal public record.

[1] Comments submitted by the National Park Service and the State Historic Preservation Officer (SHPO) on the Preliminary Finding of Effect (Attachment 2 of the EA) and the Supplemental Design Guidelines (Attachment 4 of the EA) were addressed as part of the National Historic Preservation Act Section 106 consultation process. The NPS and SHPO letters are provided in Attachment 3 of the EA.

The Trust fully assessed all issues raised by the comments received during the review period. In response to the comments, the Trust affirms it will:

- continue to engage the public during the design process (Public Participation);
- monitor traffic volumes and intersection operating conditions, adjust transportation demand management (TDM) measures and make roadway improvements (Transportation);
- increase the frequency of PresidiGo as ridership increases (Transportation);
- collect and share visitor data at key locations and inside the Presidio Visitor Center to better understand visitation patterns to support ongoing management of the area (Visitation);
- ensure that all project features preserve or enhance historic views (Cultural Resources);
- adopt best practices to prevent the spread of pathogens and invasive plants during construction (Biological Resources);
- further increase water efficiency during the design process through more efficient irrigation systems, recycled water usage, onsite stormwater capture, and limiting turf wherever possible (Water Resources); and
- explore options during the design process to reduce the traffic noise level in areas near the tunnel portals (Noise).

A summary of public comments received during the review period on the Presidio Tunnel Tops Environmental Assessment with responses to the key issues and concerns raised are as follows:

Purpose and Need

Comment: The Trust should only use those goals listed in the Purpose and Need to weigh or eliminate alternatives (NPS).

Response: In response to the comment, the rationale for eliminating marsh expansion from further study has been revised to align with the Purpose and Need goals as follows:

> *This alternative was eliminated from further study because marsh expansion in the project site would severely limit the area available for educational uses associated with the Crissy Field Center and Learning Landscape. Expanding these facilities ~~so that~~ would allow the number of youth educated on the ~~site can~~ Youth Campus to be increased from the pre-Presidio Parkway 23,000 per year to between*

50,000 and 60,000 per year ~~is a key goal of the proposed project~~, which supports ~~a broader Trust~~ the project goal ~~of serving every child in San Francisco~~ to provide exceptional environmental learning opportunities. Reaching ~~these~~ this goal~~s~~ requires new educational facilities and outdoor learning environments that fill the entire ~~project site~~ Youth Campus.

Consistency with Land Use Plans and Policies

Comment: The EA should include the Sports Basement EA in this section (NPS).

Response: Sections 1502.16(c) and 1506.2(d) of the CEQ regulations require NEPA documents to discuss any inconsistency of a proposed project with any approved land use plans or policies. The term "land use plans" includes formally adopted documents for land use planning, such as the PTMP, and related regulatory requirements. The Sports Basement EA does not constitute a land use plan or policy for purposes of the discussion. Nonetheless, there are no potential conflicts between the Presidio Tunnel Tops and Sports Basement. The Sports Basement is addressed in the cumulative impact analysis at the end of the Section 4, Environmental Consequences.

Transportation

Comment: The Trust should increase the availability of public transit routes in the Presidio to immediately reduce the number of private automobiles traveling through and being parked in it (Raymond R. Holland).

Response: The Trust supports public transit routes serving the Presidio. As the Presidio population of visitors and employees increases, the demand for public transit will also increase, warranting service enhancements. The Trust requested SFMTA extend the 29 MUNI route to Fort Scott and extend the 44 MUNI route to the Main Post. We welcome community support of these proposals and other transit improvements. The Trust is also taking action to improve transit access in less direct ways. For instance, the Trust is currently pursuing design and construction of the Greenwich Gate and remaining portion of the Presidio Promenade multi-use trail, which will substantially improve the connection to the 41 and 45 MUNI routes that terminate at Lyon/Greenwich.

Comment: The Trust and others should do a much better job of "branding" the Presidio to establish more Muni transit routes between the City and the park and ensure that such information is readily available to and understandable by visitors (Raymond R. Holland).

Response: In recent years, the number of visitor destinations in the park has increased, and the number of park visitors is expected to grow further as the remaining vacant buildings in the park are occupied. The Trust has intensified efforts to welcome the public, including marketing efforts like those described

by the commenter. The Trust is also taking steps to make PresidiGo shuttle information more widely available and accessible. The PresidiGo schedule is already integrated with Google maps, and the Trust shares PresidiGo real-time arrival information with various third party apps so that visitors can more easily find information about PresidiGo shuttle service across multiple digital platforms. The Trust recently reformatted PresidiGo information on its website (www.presidio.gov) to be more user-friendly. Event sponsors are also encouraged to promote transit, walking and biking in their promotional materials. This is an area of continued effort and focus with growth in visitation.

Comment: The Trust should have a monitoring and adaptive management plan in place to be prepared for implementation of signals to manage traffic (NPS).

Response: The Trust will collect comprehensive traffic data throughout the park after some critical park roadways reopen from construction-related closures in 2018. In addition to intersection turning movement counts during weekday commute and weekend peak periods, the Trust will also gather continuous machine counts for a week-long period. A study will be conducted to better understand if and how pass-through traffic patterns have changed in recent years. The construction of the Presidio Parkway has closed at least one major roadway in the park since 2010, and this upcoming data collection effort will be the Trust's first opportunity to collect traffic data with its complete roadway network. The data will allow the Trust to monitor traffic volumes and intersection operating conditions, and compare current conditions to traffic projections from the PTMP EIS and subsequent studies. As it has in the past, the Trust will continue to collect traffic data periodically to monitor traffic conditions, plan roadway improvements and adjust TDM measures. Based on the results from the 2018 data collection effort, the Trust will develop a schedule for gathering future traffic data.

Comment: The EA should include the Mason Street/Marine Drive intersection as well as Crissy Field Avenue and McDowell Avenue (north end) (NPS).

Response: The requested intersections are farther removed from the project area, and consequently were not included as study intersections. A recent study completed for the Crissy Field corridor evaluated the intersection of Mason Street/Marine Drive, which is expected to operate at LOS A under long-term weekday peak hour and weekend peak hour conditions. Per the Presidio Trails and Bikeways Master Plan, the one-way uphill portion of Crissy Field Avenue is planned to be closed to vehicular traffic and converted to a multi-use trail, which would effectively eliminate the intersection of Crissy Field Avenue/McDowell Avenue.

Comment: The Trust should increase PresidiGo's frequency to Crissy Field from the Transit Center, particularly during weekends (NPS).

Response: The Trust intends to increase the frequency of PresidiGo as ridership demand increases. The completion of Presidio Parkway construction and the Presidio Tunnel Tops project would also substantially improve pedestrian access between Crissy Field and the Main Post. With this improved pedestrian access, many people are likely to choose to walk from the Transit Center to Crissy Field rather than transfer to the PresidiGo Crissy Field route.

Comment: The EA should state the assumptions around trip generation for open space and underlying building uses along Mason Street (NPS).

Response: Trip generation rates for open space components of the Presidio Tunnel Tops project are provided in Table 5 of the EA and are derived from Crissy Field data. There are very few available data sources for open space trip generation rates, and although the uses are not exactly the same, the uses are similar and Crissy Field has a similar geographic location. The open space trip generation rates vary across alternatives based on the percentage of usable space in each alternative as discussed.

All buildings along Mason Street were assumed to be occupied, based on the best available information. Building 610 was assumed to be a cultural/educational use as envisioned in the PTMP. Building 643 was assumed to be industrial/warehouse use per an interagency agreement with the NPS. Stillwell Hall (Building 650) and adjacent Building 651 were assumed to be lodging per the PTMP.

Comment: The EA should clarify what peak period for level of service (weekday, weekend, peak weekend) is used as a performance standard (NPS).

Response: The EA provided weekend conditions as a point of reference, but the Trust will not propose intersection signalization based on traffic conditions that only occur on peak weekends. If an intersection functions at an acceptable level of service on weekdays, but at an unacceptable level of service on a typical weekend, more intensive TDM measures to mitigate weekend conditions will first be implemented. Such measures might include adjusting weekend parking fees or operating more frequent weekend PresidiGo service. The Trust recently implemented a differential parking fee structure, including higher weekend parking fees in areas that are more crowded on weekends. Such strategies are components of an adaptive management plan to monitor and manage traffic conditions.

Comment: The EA should include the Sports Basement EA transportation impact analysis in the intersection analysis (NPS).

Response: The traffic analysis in the EA is cumulative in nature, and consequently assumed the Mason Street Warehouses (Buildings 1182-1188) are occupied by Sports Basement as evaluated in the Sports Basement EA.

Parking

Comment: The EA should not assume paid parking on Crissy Field beyond what is in place currently (NPS).

Response: The EA simply identifies parking management in Area A as a measure to address potential spillover impacts to parking areas in Area A. The Trust has also implemented other Transportation Demand Management (TDM) measures, but parking management (fees and/or time restrictions) is typically the backbone of any TDM program. If the NPS is unwilling to implement parking fees in Crissy Field (Area A) and finds spillover parking unacceptable, time restrictions or other parking management measures could be considered.

Comment: The EA should clarify whether parking utilization assumes fully projected building occupancy (NPS).

Response: Table 8 in the EA identifies current parking utilization and is intended to provide context for the discussion of projected future parking conditions. The table identifies projected parking demand and supply and assumes occupancy of currently vacant buildings (i.e., full buildout) in both the Main Post and Crissy Field districts.

Comment: The EA should explain, if events are proposed to be capped at 1,200 persons to ensure that supply meets demand, how the number of persons affects or translates to parking supply given that event participants may arrive at the site by many different modes of transportation (NPS).

Response: A 1,200 person event is expected to generate parking demand for approximately 435 vehicles if event transportation were not managed. Permitted events of such size, however, are typically managed, and allowed the use of a very limited amount of parking. Event organizers must provide a transportation plan for the approximate number of participants and spectators, and are strongly encouraged to promote transit, various taxi/ride share services, walking and biking to event participants. Depending on the size and nature of the event, some organizers charter bus service.

Comment: The EA should clarify how the objective of increasing parking supply in key areas to meet demand to minimize the negative effects of motorists circulating in search of available parking will be achieved for Alternative 3, which proposes the least amount (amongst alternatives) of parking on the project site to meet demand (Amy Meyer, NPS).

Response: Increasing parking supply outside the project site but in a centrally located area of the Crissy Field (Area B) district will be within reasonable walking distance of most Crissy Field uses as well as the Main Post, and could act as a shared parking resource for both districts. The demand for parking in these

districts often varies by time of day and day of week based on the surrounding uses, and a supply of parking in a centralized location in the park could efficiently serve multiple uses with demand that peaks at different times.

Visitation

Comment: The EA should clarify impacts associated with a growing youth program at the Youth Campus (NPS).

Response: The 3 acre Youth Campus will be comprised of the Crissy Field Center and its associated secured courtyard and the adjacent, public outdoor experience, the Learning Landscape. A new Field Station will serve the public as a gateway to the Learning Landscape and the newly renovated Crissy Field Center (Building 603). A small new building will include a Science Lab and Art Lab that expands the capacity of the Crissy Field Center youth programs. The features of the Youth Campus will focus on these themes: gathering, play, discovery, learning and environmental leadership. The Learning Landscape will be organized around a main looping path that connects a series of rooms within dune-inspired landscape. It will be designed for a wide variety of nature play experiences that provide a range of physical challenges, as well as opportunities for learning, discovery and creative engagement. The age range for these elements will run from toddler through thirteen, with some elements geared towards teens and the high school students involved in the youth mentorship programs.

The impacts of the Youth Campus, Learning Landscape, Field Station and renovated Crissy Field Center are taken into account in the evaluation in Section 4, Environmental Consequences of the EA. Of the expected 1,857 people at one time visiting the project site on a peak weekday during the school year, approximately 459 (25 percent) would be associated with the youth program. On peak weekends during the summer, about 619 (23 percent) of the 2,749 people at one time at the project site would be engaged in activities at the Crissy Field Center and Youth Campus. According to the Golden Gate National Parks Conservancy, over time, it is expected that approximately 100,000 youths will be served by the Crissy Field Center and Youth Campus programs annually. Circulation throughout the campus is designed to ensure that the arrival of the public and the gathering of school children will be managed to minimize impacts on the overall visitor experience and parking at Crissy Field. Detailed information on the Youth Campus are provided in the most recent design documents submitted by James Corner Field Operations (2017) and were made available to the NPS for review and comment.

Comment: The Trust should confirm whether retail, food service and restrooms are anticipated to be accommodated within the project and elsewhere (NPS).

Response: The following table is being provided at the request of the NPS. The table shows the proposed increase in services that would occur within the project area.

VISITOR SERVICES WITHIN THE PROJECT AREA

Building	Gross Square Feet (gsf)	Retail (gsf)	Food Service (gsf)	Restrooms
Presidio Visitor Center (Building 210)	6,430	1,286	—	Staff Only
Transit Center (Building 215)	1,848	—	1,133	Public
Food/Retail Building (Building 201)	6,200	3,100	3,100	Public
Crissy Field Center (Building 603)	11,801	—	—	Program Users Only
Field Station & Classroom	6,528	—	—	Public

Comment: The EA should clarify whether 1,200 is the cap per individual event or the cap for multiple events totaled together for one day (NPS).

Response: Twelve hundred represents the total number of people at one or more outdoor programs or events at any one time within the project site. The types of programs envisioned for the project site are small to moderate in scale. A program approval process will be implemented to ensure that the cap is not exceeded, and that programs are not scheduled for days with high general visitation to the site. The cap will minimize the need to implement program mitigation measures, other than normal crowd control management to ensure visitor comfort during the programs.

Comment: The EA should provide a reference for the statement that Crissy Field has more visitors than originally designed to accommodate (NPS).

Response: The assertion is supported by the following finding reached on page 46 in the draft Crissy Refresh Study (Golden Gate National Parks Conservancy 2014):

> *Finding – Improve Circulation & Access*
>
> *Vehicle, bicycle and pedestrian conflict points are of high concern at Crissy Field. Crissy Field has more visitors than originally designed for. As a result, the parking, circulation and access to Crissy Field are confusing, frustrating and can be perceived as unsafe.*

A reference to the draft study has been provided in the EA.

Comment: The EA should explain why more visitors from Crissy Field would reroute their trip through the Presidio Tunnel Tops than visitors to the Presidio Tunnel Tops would discover Crissy Field (NPS).

Response: As advised by the NPS during scoping, the EA assumes limited programming and visitor amenities in the mid-Crissy Field (existing conditions) area as the baseline for the visitation analysis, with a reference to "refresh" repairs and improvements in the evaluation of cumulative impacts. The current lack of visitor facilities in mid-Crissy Field area is in stark contrast to the proposed features at the Presidio Tunnel Tops, which is viewed as the gateway to the Presidio and the "best place to begin a Presidio experience." The project site boundaries also includes the Visitor Center, which would attract more visitors. For this reason, it is expected that the more programmed areas and visitor attractions would draw more visitors to the Presidio Tunnel Tops from Crissy Field than vice versa. This assumption for the purposes of planning may need to change should the strategies and potential improvements in the mid-Crissy area come to pass, and monitoring may be warranted. Meanwhile, the Trust will continue to coordinate with the NPS on future Crissy Refresh projects and initiatives to strengthen the connection between the Main Post and Crissy Field.

Comment: The EA should clarify how Alternative 3 would deliver "greater participation by the local and regional population" than the other alternatives (NPS).

Response: Among the alternatives, Alternative 3 would provide the most diverse recreational opportunities offered within the project site, which would encourage the widest participation by the local and regional population, especially those that are not traditional park visitors. The Trust will make efforts for programming purposively aimed at engaging a wider audience that reflects the diversity of the Bay Area. The Trust will improve public transportation opportunities to help connect the larger audience to the Presidio Tunnel Tops and the Presidio, as we have done in the past. We believe the lack of visitor amenities and programmed areas within the other alternatives might not encourage as much connection to the diverse local and regional population.

Comment: The Trust should commit to monitoring visitor use at the Presidio Tunnel Tops and developing an adaptive management program (NPS).

Response: The Trust has been collecting visitor data throughout the Presidio for several years, including maintaining automated counting devices along various trails and visitor destinations that count pedestrians, bicycles, and in some cases, automobiles. The data is shared with the NPS and the Golden Gate National Park Conservancy and is very useful in support of park management activities, reporting and fundraising efforts. We intend to continue this work at the project site with the installation of new counters at key locations, both inside the Visitor Center and on site, to gain a comprehensive understanding of visitation patterns to support ongoing management of the area.

In addition to automated counting, the Trust and its partners completed a comprehensive visitor intercept survey (with a follow-up phone survey) in 2008. The survey, one of the most comprehensive efforts of its kind in the national park system at the time, collected data to understand park visitation (e.g., demographics, socioeconomics, mode of travel, likes and dislikes, etc.) and establish a baseline from which future surveys could be evaluated. Given the Presidio Tunnel Tops opening and other park enhancements (physical and programmatic) that have occurred since 2008, the timing may be ripe to repeat the survey.

Cultural Resources

Comment: The Trust should continue the Section 106 process as the final design evolves (Paul Wermer).

Response: The Trust conducted the Section 106 process according to its Programmatic Agreement (PTPA) agency outreach and consultation requirements that maximized opportunities for public and signatory party involvement. The Section 106 process informed the development and selection of alternatives in the EA, the assessment of effects, and changes to the final project design in order to reflect agency and public input, thus meeting the purpose and intent of Section 106. This process included providing the signatory parties additional opportunities to review the project design prior to reaching consensus on the conditional finding of no adverse effect. The process has concluded as required by the regulations in order for the Trust to move forward on the project. Should final landscape design evolve to the point that additional alternatives to address historic resources will need to be developed, the Trust will revisit its decision and revise or supplement the EA.

Comment: The Trust should take a holistic approach to preserving the historic setting in schematic design (NPS).

Response: The Trust studied the project area extensively, and used applicable planning and design guidelines, treatment recommendations from cultural landscape reports and building-specific studies to guide the design process from conceptual through schematic design. The studies included the Presidio Trust Management Plan district guidelines, the Main Post Planning & Design Guidelines and Cultural Landscape Report, the Mid-Crissy Area Design Guidelines and other site-specific design guidelines. These documents address the importance of views, and direct that new elements remain compatible with and subordinate to the historic landscape. The Cultural Landscape Report (CLR), for instance, advises that "new designs for areas affected by the construction of Presidio Parkway are compatible with the historic features of the Main Post and preserve or enhance historic views from the Main Post to the bay" (treatment recommendation G1, page 295). In response to the comment, the CLR treatment recommendation has been made a mitigation commitment in the EA to be monitored during the design process.

Comment: The signatory parties to the PTPA do not concur with the Trust's determination of "no adverse effect" for the project based on the schematic design analyzed in the Preliminary Finding of Effect (NPS, SHPO).

Response: The Trust consulted with the NPS and SHPO in 2016 and 2017 in order to identify changes to the project design that were needed to achieve their concurrence with a finding of no adverse effect for the project. Design changes included the elimination of the New Observation Post building, simplification of the path network on the bluff top, modifications to the terraced seating element, and reductions in the height of berms at the Learning Landscape and Western Hollow areas. The Trust will also complete additional consultation on the play elements in the Learning Landscape and the covered seating at the Transit Center under the terms of an agreement reached on a conditional no adverse effect determination for the project (Trust, 2017b).

Light and Glare

Comment: The Trust should share more about the "dark skies" features of what is planned as the Presidio is mostly dark at night and the project design should help protect that darkness (Amy Meyer). Should the Youth Center and Learning Landscape be used at night, path lighting could cast light pollution around Crissy Marsh (Sharon Tsiu).

Response: Site lighting for the project is intended to be simple, consistent and discrete while enhancing the visitor experience. Light levels will be designed according to the character of the spaces in the project and according to the Final Report of the Presidio Parkway Project Lighting Recommendations and the joint International Dark Sky Association/Illuminating Engineering Society Model Lighting Ordinance (2011). Luminaire types will be selected with consideration for the site topography, targeted light levels, longevity (durability), ease of maintenance and with sensitivity to views and the naturalistic nighttime environment. Lighting controls will be coordinated with an astronomical timeclock that turns on/off the light at dawn and dusk. Dimming of fixtures via motion sensors will be considered where applicable for energy conservation.

Biological Resources

Comment: The Trust should not use the Crissy Field Marsh Expansion Study as a rationale for rejecting marsh expansion in the project area (NPS).

Response: As noted by the commenter, the EA provides many reasons for not expanding the marsh within the project site. The Crissy Field Marsh Expansion Study is referenced because it makes clear that marsh expansion in areas near the flood shoal would provide the most benefits. This is an important factor that should be used to inform subsequent planning and decision-making and will by no means preclude lower priority areas for enlarging the marsh.

Comment: The Trust should describe additional measures to prevent the spread of pathogens and invasive plants during construction (e.g., cleaning and disinfection of tools, vehicles, boots, etc.) (NPS).

Response: In response to the comment, a new measure to protect native plant communities has been added. Note the Trust has recently prepared management guidelines (Trust 2017a) and is initiating their use to address destructive plant pathogen and exotic invasive species within the Presidio. Best practices included in the guidelines will help produce cleaner planting materials, improve sanitation, monitor for pathogens, evaluate imports and treat materials where appropriate. As our understanding of the issue improves, the guidelines will be modified and updated to reflect necessary changes.

Comment: The EA should note other common fish in the Crissy Field Marsh and that the marsh supports a variety of crustaceans and benthic invertebrates (NPS).

Response: The Trust thanks the NPS for the information, which has been added to the EA.

Water Resources

Comment: The Trust should reduce the lawn area further and select native meadow wildflowers and bunch grasses to echo the bluff plantings instead of the Main Parade to bring Alternative 3 much closer to the water demand of Alternative 1 (Amy Meyer, Golden Gate Audubon Society).

Response: As noted in the EA, the landscape will be designed to conform with the State's recently adopted Model Efficient Landscape Ordinance, which among other requirements, limits the portion of landscapes that can be covered in turf. Additionally, the landscape will be designated as a Bay-Friendly Rated Landscape, which refers to a comprehensive approach to the design, construction and maintenance of healthy, environmentally-sound landscapes to reduce waste and protect the watersheds and communities of the San Francisco Bay Area.

The landscape design is organized around a series of planting zones: ornamental gardens, meadows, lawns, coastal woodland, coastal riparian, bluff, and dunes. Within these planting types, approximately 50 percent of the plants will be indigenous to the Presidio, with the rest being California-native or non-invasive introduced species. Management and conservation of water used for irrigation of landscaped areas will be realized through the distinct irrigation zones. The purpose is to maximize the efficient use of irrigation water by allocating more water to areas where it will have the greatest impact, i.e., in the immediate vicinity of high and medium high water use landscape areas such as turf areas, and less water to areas with medium water use landscapes such as shrub areas and low water use landscapes such as slopes with drought tolerant plant materials. Plants having similar water requirements will be grouped together in the same zone (low water users in one zone, moderate water users in another). Each zone will be irrigated separately and with the most appropriate type of irrigation system. In this way, the frequency and amount of water being applied through irrigation will be carefully controlled so as to

avoid needless over-watering that results when plants that have both high and low water requirements are mixed together.

The latest schedule showing annual water use and irrigation methods for the various landscape types in the proposed project is provided in the Hydrozone Plan (see Figure 6-1). While there will be a nominal increase over current water demands, this increase is not expected to substantially change projected water usage for the Presidio. The Trust may elect to offset the increase in water usage by not irrigating other areas within the park.

Comment: The Trust should provide native plantings closer to the Presidio Visitor Center to enhance the national park experience, and offer educational opportunities about native plants, wildlife and water conservation (Golden Gate Audubon Society).

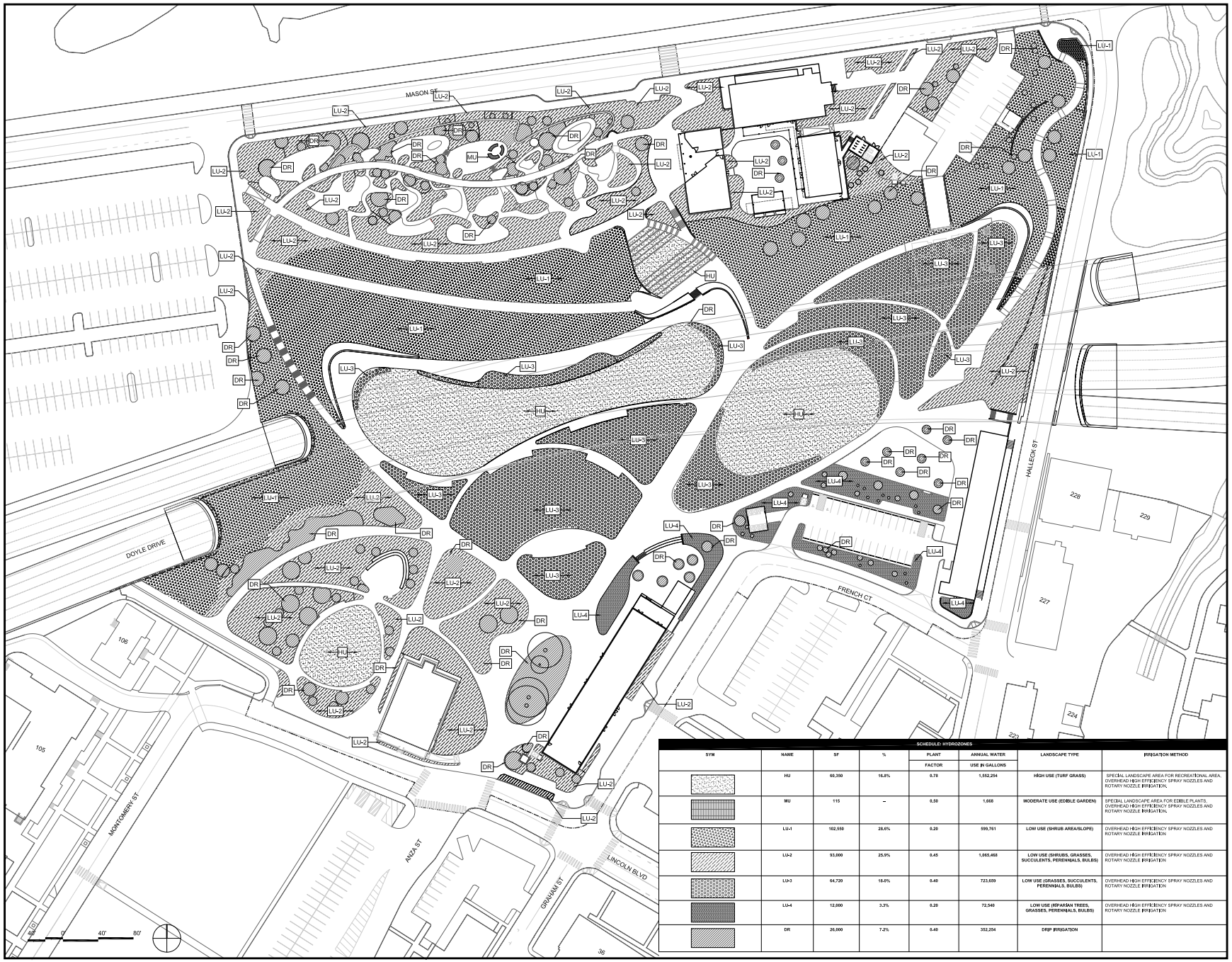
Response: The Presidio Visitor Center (Building 210) and its surrounding landscape is visually connected to the Main Post and will be planted in keeping with the cultural landscape of the Main Post. Plants for these areas will have low to medium water requirements and will include species that are attractive to birds and butterflies. The plantings will transition to more native plant communities along the bluff and in the lower areas close the Mason Street and Crissy marsh, offering more educational opportunities about native species. Educational opportunities about wildlife and water conservation will be possible throughout the project site.

Comment: The Trust should further reduce impervious surfaces during schematic design and implement irrigation practices that minimize water use (Amy Meyer, Sharon Tsiu, NPS).

Response: As noted in the EA, the Trust will carefully design project landscapes for their intended function. Landscape and Irrigation Design Plans will be submitted during schematic design and design development that will meet the design criteria and requirements listed in the State's Model Water Efficient Landscape Ordinance and conform to the Trust's irrigation guidelines. For the efficient use of water, the Trust will select water-conserving plant and turf species, especially local native plants; and will select plants based on local climate suitability, disease and pest resistance. The Trust will audit the performance of the irrigation system in-depth periodically to prevent overspray or runoff that causes overland flow. Implementation of pervious surfaces as well as other BMPs to reduce the impact of impervious surfaces will be evaluated during the design process.

Comment: Trails should have permeable surfaces where possible (Amy Meyer).

Response: Permeable surfaces will be applied within smaller garden paths, the fire circle, outdoor classrooms and play areas in the Learning Landscape, the Youth Collaborative courtyard, the central Zocalo feature and a portion of the picnic area adjacent to Building 201.



SCHEDULE: HYDROZONES

SYM	NAME	SF	%	PLANT FACTOR	ANNUAL WATER USE IN GALLONS	LANDSCAPE TYPE	IRRIGATION METHOD
	HU	66,350	16.8%	0.70	1,552,254	HIGH USE (TURF GRASS)	SPECIAL LANDSCAPE AREA FOR RECREATIONAL AREA. OVERHEAD HIGH EFFICIENCY SPRAY NOZZLES AND ROTARY NOZZLE IRRIGATION.
	MU	115	–	0.50	1,668	MODERATE USE (EDIBLE GARDEN)	SPECIAL LANDSCAPE AREA FOR EDIBLE PLANTS. OVERHEAD HIGH EFFICIENCY SPRAY NOZZLES AND ROTARY NOZZLE IRRIGATION.
	LU-1	102,550	26.6%	0.20	590,761	LOW USE (SHRUB AREA/SLOPE)	OVERHEAD HIGH EFFICIENCY SPRAY NOZZLES AND ROTARY NOZZLE IRRIGATION
	LU-2	93,000	25.9%	0.45	1,065,468	LOW USE (SHRUBS, GRASSES, SUCCULENTS, PERENNIALS, BULBS)	OVERHEAD HIGH EFFICIENCY SPRAY NOZZLES AND ROTARY NOZZLE IRRIGATION
	LU-3	64,720	18.0%	0.40	723,659	LOW USE (GRASSES, SUCCULENTS, PERENNIALS, BULBS)	OVERHEAD HIGH EFFICIENCY SPRAY NOZZLES AND ROTARY NOZZLE IRRIGATION
	LU-4	12,000	3.3%	0.20	72,540	LOW USE (RIPARIAN TREES, GRASSES, PERENNIALS, BULBS)	OVERHEAD HIGH EFFICIENCY SPRAY NOZZLES AND ROTARY NOZZLE IRRIGATION
	DR	26,000	7.2%	0.40	352,254	DRIP IRRIGATION	

FIGURE 6-1 HYDROZONE PLAN

Comment: The Trust should install water bottle refill stations to encourage reusable water containers and discourage plastic (Georgeanne Wedergren).

Response: We appreciate the suggestion and are making permanent public water sources available throughout the Presidio. At least one outdoor water bottle refill station (tap station) will be installed at a convenient location within the project area to provide free drinking water to visitors.

Cumulative Impacts

Comment: The EA should more accurately reflect the full range of reuse options GGNRA may consider in the future for Building 1199 (NPS).

Response: The reuse options and descriptions in the EA for Building 1199, one of the eight projects relevant to the cumulative impact analysis, were based on suggestions made at GGNRA's August 7, 2013 5X/Project Review Meeting for possible uses of the building if it became permanent (see The Future of the Crissy Field Center Building 1199, PEPC 48537) (NPS 2013). The suggestions made for the area if the building were removed (i.e., the existing management direction or the "No Action") were inadvertently not included in the EA. The Trust understands that at this time there is no proposed action and a preferred alternative has not been identified. Therefore, in response to the comment, the EA has been revised to read as follows:

- *Potential long-term use of Building 1199 (temporary Crissy Field Center) for as-yet-undefined park-related and public uses (NPS): Suggested uses include reuse or repurpose for East Beach; lease for income; kayak, bike and other recreational equipment rentals; food service or event rental; outpost for Crissy Field Center (Building 603).* Suggested uses should the building be removed include a picnic area, parking for East Beach and elevated walkways.

Miscellaneous

Comment: The Trust should explore options to reduce traffic noise emanating from the Presidio Parkway east-facing west tunnel (Molly Cargas, Amy Meyer).

Response: The Doyle Drive EIS/R noted that elements of the tunnel design may affect receptors in areas near the tunnel portals. As the project progresses towards final design and construction, the Trust will investigate a variety of noise barrier options, in terms of both material and design, that can reduce the traffic noise level.

Comment: The Trust should reconsider the Compass Rose being built directly into the walkway, as it is unreasonable to assume that visitors would look at any didactic content on a traveled pathway surface (Whit Hall).

Response: The compass rose is only one of a series of interpretive features being considered for the Presidio Tunnel Tops that when combined with the Presidio Visitor Center, will interpret the rich military history of the Presidio. During the design phase, we will explore ways to elevate the visibility of this feature and to connect visitors more deeply to the stories of the individual soldiers that served in the engagements being commemorated.

Comment: The Trust should eliminate the "Zocalo" name for the non-historic plaza area given the historical significance of the Zocalo in Mexico City (Amy Meyer, Paul Wermer).

Response: The Trust will explore other names for this feature.

Comment: The Trust should disclose how pets brought by visitors into the project site would be managed (Georgeanne Wedergren).

Response: Dogs will be required to be on leash at all times. Dog-waste stations with clean-up bags to facilitate pet waste removal will be provided should the need arise.

ATTACHMENT 7 ERRATA

ERRATA

This attachment presents staff-initiated text changes for the Presidio Tunnel Tops Environmental Assessment. The text changes reflect revisions made in response to public and agency comments that were received subsequent to the October 28, 2015 publication of the EA. The revisions are organized by EA section. Existing text (no proposed changes) is *italicized*, deleted text is ~~*struck through*~~ and new text is color coded and underlined. The text additions and revisions clarify and expand the information presented in the EA and Responses to Comments (Attachment 6). The revised text does not provide new information that changes the project or the determination of any environmental impacts, but rather clarifies, updates and provides additional relevant information to support the administrative record.

GLOBAL

Replace New Presidio Parklands with Presidio Tunnel Tops.

COVER SHEET

Replace entire cover sheet with new cover sheet.

TABLE OF CONTENTS

Replace entire table of contents with new table of contents.

SECTION 3 DESCRIPTION OF PROPOSED PROJECT AND ALTERNATIVES

Alternatives Considered but Rejected, Expand Crissy Marsh Alternative, page 28 – Change the first paragraph as follows:

> *This alternative was eliminated from further study because marsh expansion in the project site would severely limit the area available for educational uses associated with the Crissy Field Center and Learning Landscape. Expanding these facilities ~~so that~~ would allow the number of youth educated on ~~the site can~~ Youth Campus to be increased from the pre-Presidio Parkway 23,000 per year to between 50,000 and 60,000 per year ~~is a key goal of the proposed project~~, which supports ~~a broader Trust~~ the project goal ~~of serving every child in San Francisco~~ to provide exceptional environmental learning opportunities. Reaching ~~these~~ this goals requires new educational facilities and outdoor learning environments that fill the entire ~~project site~~ Youth Campus.*

SECTION 4 ENVIRONMENTAL CONSEQUENCES

Mitigation Commitments, Cultural Resources, page 39 – After Visitation bullet, insert new heading and arrow point:

Cultural Resources

- The Trust will ensure that new designs are compatible with adjacent historic features and preserve or enhance historic views.

Mitigation Commitments, Biological Resources, page 40 – Insert second arrow point:

- The Trust will use best practices to prevent the introduction and spread of pathogens and invasive plants.

Parking, Table 8, Comparison of Main Post Parking Demand and Supply by Alternative, page 60 – Change the table title as follows:

> *8 Comparison of ~~Main Post~~ Parking Demand and Supply by Alternative*

Visitation, Crissy Field, page 61 – Add the reference to the Crissy Refresh Study and the correct reference to the America's Cup EA to the end of the last two sentences in the first paragraph as follows:

> *Crissy Field has more visitors than it was originally designed to accommodate* (Golden Gate National Parks Conservancy 2014). *Access is difficult on weekends when there is exceptional weather and special events. However, on most existing weekdays and weekends, there is zero to minor crowding (NPS* and U.S. Coast Guard *2012).*

Cultural Resources, NHLD Contributors within the Project Site, page 70 – Replace the run-on sentence after the heading with the following:

> ~~*Building 603 is the only*~~ *NHLD-contributing building*s *within the project site include Buildings 210, 603 and 201.*

Biological Resources, Vegetation Communities and Wildlife Resources within the Project Area, Coastal Salt Marsh, page 97 – Change the last sentence in the paragraph and add another sentence at the end as follows:

> *The marsh is also frequented by a variety of fish species including but not limited to* ~~*leopard shark (Triakis semifasciata),*~~ *threespine stickleback (Gasterosteus aculeatus), Topsmelt* (*Atherinops affinis*), Pacific staghorn sculpin (*Leptocottus armatus*), ~~*and*~~ *a variety of gobies (*Gobidae)[12] and on a few rare occasions, leopard shark (*Triakis semifasciata*). The marsh also supports a variety of crustaceans and benthic invertebrates.
>
> [12] *Note: does not include the federally-listed tide water goby (*Eucyclogobius newberryi*).*

SECTION 5 REFERENCES

Add the following references:

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_____. 2016a. Letter from Chris Lehnertz, General Superintendent to John Pelka. Re: NPS/GGNRA Comments on New Presidio Parklands EA. Dated January 19.

_____. 2016b. Letter from Chris Lehnertz, General Superintendent to Michael Boland. Re: Joint Comments from the GGNRA and the Pacific West Regional Office on the Preliminary Finding of Effect in the Third Consultation Package for the New Presidio Parklands. Dated January 19.

_____. 2017. Letter from Cicely Muldoon, Acting General Superintendent to Jean Fraser. Re: Joint Comments from the GGNRA and the Pacific West Regional Office on the July 20, 2017 Consultation Package and September 15, 2017 Consultation Meeting for the Tunnel Tops Project. Dated October 11.

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_____. 2016b. Letter to Rob Thomson, Presidio Trust from Julianne Polanco. Re: Tunnel Tops Project (formerly known as New Presidio Parklands Project), Presidio of San Francisco National Historic Landmark District. Dated May 5.

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_____. 2017c. Letter to Rob Thomson, Presidio Trust from Julianne Polanco. Re: Tunnel Tops Project, Presidio of San Francisco National Historic Landmark District. Dated February 7.

_____. 2017d. Letter to Rob Thomson, Presidio Trust from Julianne Polanco. Re: Tunnel Tops Project, Presidio of San Francisco National Historic Landmark District. Dated October 4.

Presidio Trust (Trust). 2015e. Notice of Availability / Invitation to Participate and Comment. New Presidio Parklands Project Environmental Assessment. Dated October 28.

_____. 2015f. Notice Extending Prescribed Comment Period. New Presidio Parklands Project Environmental Assessment. Dated November 4, 2015.

_____. 2017a. Phytophthora Management Guidelines. Dated January.

_____. 2017b. Consultation on Presidio Tunnel Tops – Conditional Finding of No Adverse Effect. Dated November 21.

ATTACHMENTS

Attachment 1, Finding of No Significant Impact – Replace entire draft document with signed document.

Attachment 2, Finding of Effect – Replace Chapter 4 with revised chapter.

Attachment 3, Agency Correspondence – Add EA comment letters and key NHPA Section 106 Consultation emails/letters.

New Attachment 6, Responses to Comments Received on the New Presidio Parklands EA – Add responses to comments document.

New Attachment 7, Errata – Add errata sheets.

New Attachment 8, Mitigation Monitoring and Enforcement Program – Add mitigation monitoring and enforcement program.

ATTACHMENT 8

MITIGATION MONITORING AND ENFORCEMENT PROGRAM

MITIGATION MONITORING AND ENFORCEMENT PROGRAM[1]

Mitigation Measure	Implementation Timing	Party Responsible	Compliance Verification Mechanism	Reference
DOYLE DRIVE EIS/R MITIGATION COMMITMENTS				
Cultural Resources				
Rehabilitate buildings and restore cultural landscape features consistent with applicable treatment plans and guidelines to avoid an adverse effect to the National Historic Landmark District.	Design, pre-construction and construction	Presidio Parkway Project Proponent	Built Environment Treatment Plan	• Doyle Drive Programmatic Agreement • Doyle Drive EIS/R • Doyle Drive ROD
Archaeological Resources				
Follow protocols for archaeological monitoring and for the treatment of archaeological resources and collections management and curation of recovered materials.	Construction and post-construction	Presidio Parkway Project Proponent	Archaeological Treatment Plan	• Doyle Drive Programmatic Agreement • Doyle Drive EIS/R • Doyle Drive ROD
Visual Resources				
Re-vegetate all disturbed areas as soon as practicable with native or appropriate ornamental vegetation. Complete revegetation and restoration in accordance with the Vegetation Management Plan and standard Trust restoration practices. Include replacing plants, maintaining erosion control materials and irrigation systems, controlling weeds, and removing trash and other debris in vegetation maintenance. Check plants for disease and pests.	Construction and post-construction	Presidio Parkway Project Proponent	Vegetation Restoration Plan	• Doyle Drive EIS/R • Doyle Drive ROD

[1] These mitigation measures were established in the Presidio Tunnel Tops Environmental Assessment (EA) or during its review and will be adopted and implemented by the Trust as part of the decision. Refer to Section 4 (Environmental Consequences) of the EA for a background discussion of the mitigation measures.

Mitigation Measure	Implementation Timing	Party Responsible	Compliance Verification Mechanism	Reference
Biological Resources				
Restore vegetation removed as a result of project construction activities in accordance with the Vegetation Management Plan and standard Trust restoration practices and manage the revegetated areas.	Construction and post- construction	Presidio Parkway Project Proponent	Vegetation Restoration Plan	• Doyle Drive ROD
Avoid the use of species listed as noxious weeds for erosion control and landscaping. Take precautions including: inspecting and cleaning construction equipment; implementing eradication strategies should an invasion occur; and discouraging colonization of invasive, non-native species by stabilizing disturbed soil areas affected by construction areas as soon as they are completed.	Construction	Presidio Parkway Project Proponent	• Trust plant lists for landscaped areas • Vegetation Management Plan	• Doyle Drive EIS/R • Doyle Drive ROD
Water Resources				
Implement Stormwater Pollution Prevention Plans (SWPPPs) and follow Best Management Practices (BMPs) to reduce pollutants in stormwater discharges and potential for erosion and sedimentation during construction. Control measures could include construction of detention structures, installation of siltation fencing, appropriate grading practices, dust control, soil stabilization and temporary seeding.	Design, pre-construction and construction	Presidio Parkway Project Proponent	SWPPPs	• Doyle Drive EIS/R • Doyle Drive ROD
Incorporate flood protection features into project plans in low-lying portions of the project site that may be subject to rare flooding events.	Design	Presidio Parkway Project Proponent	Project plans	• Doyle Drive ROD
Incorporate measures into project plans to preserve surface and near-surface hydrology based on results of a hydrologic investigation.	Design and pre-construction	Presidio Parkway Project Proponent	Project plans	• Doyle Drive ROD

Mitigation Measure	Implementation Timing	Party Responsible	Compliance Verification Mechanism	Reference
Utilities				
Relocate all utilities affected by the Presidio Parkway project to provide the same level of service as the existing systems. Coordinate with the various utility providers regarding temporary and permanent utility relocations to minimize potential disruption of utility service during project construction.	Design and pre-construction	Presidio Parkway Project Proponent / Utility providers	Utility relocation plans	• Doyle Drive EIS/R • Doyle Drive ROD
Hazardous Substances				
Incorporate Trust Land Use Controls and other applicable Trust protocols for construction at and near hazardous materials sites. If project construction will affect areas under active regulatory oversight, ensure measures are compatible with ongoing remedial efforts.	Construction	Presidio Parkway Project Proponent	• Site Management Program / Contingency Plan • Regulatory agency approval	• Doyle Drive EIS/R
Air Quality				
Mitigate potential nuisance-type impacts by implementing BAAQMD's basic dust control procedures, and maintain project construction-related impacts at acceptable levels.	Construction	Contractors	BAAQMD Guidelines	• Doyle Drive EIS/R • Doyle Drive ROD
Use control technologies on construction equipment to reduce PM and NOx emissions.	Construction	Contractors	EPA Tier 4 Emission Standards	• Doyle Drive EIS/R • Doyle Drive ROD
Noise				
Adhere to applicable noise control specifications and implement appropriate avoidance and noise reduction measures to limit the temporary noise increase resulting from construction noise impacts.	Construction	Presidio Parkway Project Proponent	• San Francisco Police Code • Article 29: Regulation of Noisex • Guidelines for Noise Control Ordinance Monitoring and Enforcement	• Doyle Drive EIS/R • Doyle Drive ROD

Mitigation Measure	Implementation Timing	Party Responsible	Compliance Verification Mechanism	Reference
PTMP ROD & MAIN POST UPDATE ROD MITIGATION COMMITMENTS				
Transportation				
Signalize the Lincoln Boulevard/Girard Road intersection.	After implementing additional TDM measures and prior to the intersection operations deteriorating to LOS E or F	Trust	• Periodic monitoring of Intersection LOS • Implementation of intersection improvements	• PTMP ROD • Main Post Update ROD
Signalize the Lincoln Boulevard/Halleck Street intersection.	After implementing additional TDM measures and prior to the intersection operations deteriorating to LOS E or F	Trust	• Periodic monitoring of Intersection LOS • Implementation of intersection improvements	Main Post Update ROD
Provide bicycle and pedestrian amenities such as shelters, benches, water fountains, secure bicycle racks, route lighting and other facilities to encourage travel by foot and bicycle.	Ongoing	Trust	Trails and Bikeways Master Plan	PTMP ROD
Encourage Muni to increase frequency of service on existing Muni lines as warranted.[2]	Ongoing	Trust / Muni	Implementation of Muni Forward capital projects and service improvements	PTMP ROD

[2] Increased frequency on existing Muni lines with or without any extensions of these lines will increase the transit peak hour capacity, and consequently reduce passenger load factors on these lines.

Mitigation Measure	Implementation Timing	Party Responsible	Compliance Verification Mechanism	Reference
Encourage the NPS to implement parking regulations, time limits, and/or parking fees in Area A (notably, Crissy Field) to reduce impacts of fee parking in Area B. Provide assistance to the NPS to ensure coordination and consistency of parking management within both Areas A and B.[3]	Ongoing	Trust in coordination with NPS	Implementation of parking management program	PTMP ROD
Reduce automobile usage by all tenants, occupants and visitors.[4] If the Transportation Demand Management (TDM) performance standards as described in the PTMP are not being reached, implement more aggressive TDM strategies or intensify components of the existing TDM program such as requiring tenant participation in more TDM program elements, and more frequent and/or extensive shuttle service.	Ongoing	Trust	Periodic monitoring of TDM program	PTMP ROD
Discourage single-occupant automobile usage, encourage alternative modes of travel, and maximize use of available parking resources during park-sponsored activities and special events. Coordinate with the NPS and schedule special events that could result in overflow parking based on parking availability. Avoid scheduling events requiring large amounts of parking concurrently with other events or Presidio peak parking demand periods if combined parking demand would exceed the available supply. Provide special transit, taxi and bicycle services during their events to reduce expected parking demand and promote use of public transit, biking, walking and remote parking lots.	Prior to park-sponsored activities and special events	Trust in coordination with NPS and Event Sponsors	Implementation of parking management strategies	PTMP ROD

[3] Should the NPS choose not to adopt or enforce this measure, or is otherwise opposed to it, implementation of parking management controls in Area B would affect parking for Crissy Field (Area A).

[4] See Appendix D of the PTMP for full description.

Mitigation Measure	Implementation Timing	Party Responsible	Compliance Verification Mechanism	Reference
Identify capacity problems and potential improvements for Golden Gate Transit service at the Presidio, particularly for northbound Presidio-generated passengers during the PM peak hour.	Ongoing	Trust in coordination with Golden Gate Bridge, Highway and Transportation District	Monitoring of operations and passenger loads within the Presidio	PTMP ROD
Minimize construction-related traffic conflicts by providing information on construction phases and duration, scheduling, proposed haul routes, permit parking, staging area management, visitor safety, detour routes, and pedestrian movements on adjacent routes. Consider other individual projects in the Main Post as well as Presidio Parkway construction.	Pre-construction and construction	Contractors	Construction Traffic Management Plan	PTMP ROD
Biological Resources				
Implement the following measures as warranted to protect wildlife and native plant communities: • Schedule heavy equipment use, to the greatest extent feasible, to avoid areas where soils are wet and prone to compaction; • Implement non-native wildlife control measures; • Provide signage and/or other educational devices to encourage voluntary compliance with protection measures; • Prevent unnecessary vehicular and human intrusion and use into native and sensitive habitat communities from adjacent construction, demolition and intensive special events and recreation activities; • Prohibit the use of erosion control measures and mulches that contain non-native plant seeds; • Limit the use of fertilizers and herbicides in areas adjacent to, or up-gradient from sensitive biologic resources; and • Prepare interpretive materials and signage in areas of increased use adjacent to natural habitat areas and sensitive native plant communities.	Construction and post-Construction	Trust / Contractors	Natural Resources program	PTMP ROD

Mitigation Measure	Implementation Timing	Party Responsible	Compliance Verification Mechanism	Reference
Implement the following measures to reduce the effects on wildlife and wildlife habitat: • Conduct a site visit by a qualified wildlife biologist to assess the potential for any sensitive wildlife species, including bats, or their habitat to occur on or adjacent to the project site. If sensitive animal species are found, redesign project or modify timeline in accordance with the biologist's recommendations to avoid impacts. If avoidance is not feasible, develop species-specific and site-specific mitigation plans and pursue regulatory agency consultation (if needed) to mitigate direct take and replace habitat for the affected species; and • Follow the park guidelines for protection of nesting birds for any vegetation removal. This includes guidelines on timing of vegetation and removal.	Pre-construction and construction	Trust / Contractors	Natural Resources program	PTMP ROD
Visitation				
Ensure that park resources are protected during special events.	Prior to park-sponsored activities and special events	Trust in coordination with event sponsors	Permit conditions as appropriate	PTMP ROD
Cultural Resources				
Ensure that new designs are compatible with adjacent historic features and preserve or enhance historic views.	Design	Trust	-Cultural Landscape Report -Applicable guidelines	PTMP ROD
Water Resources				
Implement Best Management Practices (BMPs) that encourage water conservation. Given the evolutionary nature of water conservation measures, make provisions for the removal or addition of BMPs as the technical and economic reasonableness of measures are determined.	Design, pre-construction, and construction	Contractors	Stormwater Management Plan	PTMP ROD

Mitigation Measure	Implementation Timing	Party Responsible	Compliance Verification Mechanism	Reference
PRESIDIO TUNNEL TOPS EA MITIGATION COMMITMENTS				
Transportation				
Make the Mason Street/Halleck Street intersection side-street stop-controlled.[5]	After implementing any additional TDM measures to address other study intersections	Trust	• Periodic monitoring of intersection LOS • Implementation of intersection improvements	Presidio Tunnel Tops EA
Visitation				
Limit special event capacity to avoid overcrowded conditions and to protect resources, and ensure that supportable capacity levels for special events will not be exceeded.	Prior to park-sponsored activities and special events	Trust in coordination with event sponsors	Permit conditions as appropriate	Presidio Tunnel Tops EA
Coordinate management actions and protection measures in Area B with the NPS to control visitation.	Prior to park-sponsored activities and special events	Trust in coordination with event sponsors	Permit conditions as appropriate	Presidio Tunnel Tops EA
Cultural Resources				
The Trust will ensure that new designs are compatible with adjacent historic features and preserve or enhance historic views.	Design	Trust	Conditional Finding of No Adverse Effect Letter	Presidio Tunnel Tops Finding of Effect
Light and Glare				
Implement best management practices for outdoor lighting, including use of backlight, uplight and glare (BUG) ratings, and photometric analyses to avoid light pollution.	Design	Trust	Trust standard measures for lighting	Presidio Tunnel Tops EA
Biological Resources				
Pursue most practicable bird-safe construction practices for new buildings to reduce potential effects related to bird strikes and minimize the potential for adverse nighttime lighting effects on local or migratory wildlife.	Design	Trust	SF standards and guidelines for bird-safe buildings	Presidio Tunnel Tops EA

[5] Removing stop control on the Mason Street approaches and making the intersection a side street stop-controlled intersection would improve the operation for the Mason Street approaches, but delay would increase for the Halleck Street approach. Removing stop control on the Mason Street approaches would also negatively affect the pedestrian crossing at this intersection.

Mitigation Measure	Implementation Timing	Party Responsible	Compliance Verification Mechanism	Reference
Use best practices to prevent the introduction and spread of pathogens and invasive plants.	Construction and post-construction	Trust / Contractors	Presidio Phytophthora Management Recommendations	Presidio Tunnel Tops EA
Water Resources				
Implement water management practices and water waste prevention for landscapes to promote the conservation and efficient use of water and prevent waste of this valuable resource.	Design, pre-construction, construction and post-construction	Trust	• Irrigation guidelines • California Model Water Efficient Landscape Ordinance	Presidio Tunnel Tops EA
Environmental Sustainability and Climate Preparedness				
Adopt site-specific strategies identified in the EA to make the new parklands a model of sound environmental stewardship and resilient in the face of climatic extreme.	Design, pre-construction and construction	Trust	Climate Action Agenda	Presidio Tunnel Tops EA


Presidio
Trust
GOLDEN GATE
NATIONAL
PARKS
CONSERVANCY
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TUNNEL TOPS

ENVIRONMENTAL ASSESSMENT