

SPORTS BASEMENT

ENVIRONMENTAL ASSESSMENT / PRESIDIO TRUST

July 2015



FROM THE PRESIDIO TRUST ACT (P.L. 104-333)

As part of the Golden Gate National Recreation Area, the Presidio's significant natural, historic, scenic, cultural and recreational resources must be managed in a manner which is consistent with sound principles of land use planning and management, and which protects the Presidio from development and uses which would destroy the scenic beauty and historic and natural character of the area and cultural and recreational resources.

The Presidio Trust is saving a treasured American place and transforming it to serve a new national purpose.

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NEED FOR THE PROJECT

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 proposed action, focusing on its overall objectives.

The project sponsor, Sports Basement Inc. (Sports Basement), a locally-owned business that has operated the sporting goods store and recreational program center at the former Commissary (Building 610) in the Crissy Field (Area B) district as an interim tenant for over a decade, is seeking a long-term location in the Presidio of San Francisco (Presidio). Sports Basement proposes to connect Buildings 1182, 1183, 1184, 1185, 1186, 1187 and 1188 (known collectively as the Mason Street warehouses) located on Mason Street near the Marina Gate for retail and program use (project or proposed action). The project would preserve and rehabilitate the warehouses; improve ADA accessibility throughout the site; and upgrade and seismically retrofit the warehouses to meet current codes.

The Mason Street warehouses were constructed between 1917 and 1919 as part of the development of the northeast corner of the Presidio as a major supply depot. They are utilitarian, single-story wood-frame buildings with extended rectangular plans. The buildings vary in size from approximately 12,000 gross square feet (gsf) to approximately 13,500 gsf, totaling approximately 86,000 gsf. The warehouses are of a “temporary”-type of standardized wood construction first associated with the rapid expansion of military facilities during World War I (NPS 1993). The warehouses have not received any major additions, and renovations have primarily been limited to routine repairs, replacement of windows, and minor interior alterations. As the buildings retain the majority of their original historic character, they are all listed as contributors to the Presidio National Historic Landmark (NHL) district. Buildings 1182, 1187 and 1188 were most recently used as office and storage space for the once neighboring Exploratorium science museum. All seven warehouses are currently vacant.

Protecting the historic character and integrity of the Presidio NHL district while allowing the changes that would maintain the Presidio’s vitality was identified as an important objective in the Presidio Trust Management Plan (PTMP) (Trust 2002), the Trust’s comprehensive land-use plan for Area B adopted in 2002.¹ In the PTMP, the Trust envisions undertaking site

¹ PTMP, Cultural Resources, page 5.

enhancements and historic building rehabilitation at Crissy Field to accommodate uses and visitor amenities that would complement the spectacular bayfront.²

The objectives of the project are to:

1. Protect and enhance the historic buildings that are a contributing feature to the Presidio NHL district through rehabilitation and reuse;
2. Bring the buildings up to safe occupancy standards in compliance with applicable building codes;
3. Help fulfill the PTMP planning concept for Crissy Field (Area B) as a Bayfront Recreation and Cultural Destination by reusing the buildings for activities compatible with the area's open space and recreational opportunities; and
4. Generate revenue to support the ongoing operation and enhancement of the Presidio.

PURPOSE AND CONTENTS OF ENVIRONMENTAL ASSESSMENT

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).

This environmental assessment (EA) identifies the environmental effects of the proposed Sports Basement within Buildings 1182-1188 in the Crissy Field (Area B) district. The EA tiers³ from the PTMP EIS and analyzes an alternative to rehabilitating and using the Mason

² PTMP, Crissy Field (Area B), Bayfront Recreation and Cultural Destination, page 61.

³ See 40 CFR 1502.20 and 40 CFR 1508.28 (tiering). Tiering is defined as the coverage of general matters in broader EISs, with subsequent narrower tiered statements or environmental analyses, incorporating, by reference, general discussions and concentrating solely on the issues specific to the statement subsequently prepared. The CEQ NEPA Regulations encourage the use of tiered documents to "eliminate repetitive discussions of the same issues" and to "focus on the issues which are ripe for decision and exclude from consideration issues already decided or not yet ripe." The PTMP EIS can be viewed at the Presidio Trust Library or on the Trust's website at <http://www.presidio.gov/about/Pages/Presidio-Trust-Management-Plan.aspx>.

Street warehouses for multiple purposes as evaluated in the PTMP EIS. In tiering from the PTMP EIS, the EA summarizes and incorporates by reference relevant information and analysis presented in the PTMP EIS and concentrates on site-specific issues related to the current project. PTMP EIS and other mitigation measures that have been incorporated into the current project are also discussed.

The EA is divided into four sections:

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

The EA serves as the factual support for the conclusions in the finding of no significant impact (FONSI) (Attachment 1). The draft EA/ FONSI was made available for public review between October 10, 2013 and November 15, 2013 before the Trust made its final determination to not prepare an EIS and move forward to implement the project.

DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES

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

SPORTS BASEMENT (PROPOSED ACTION)

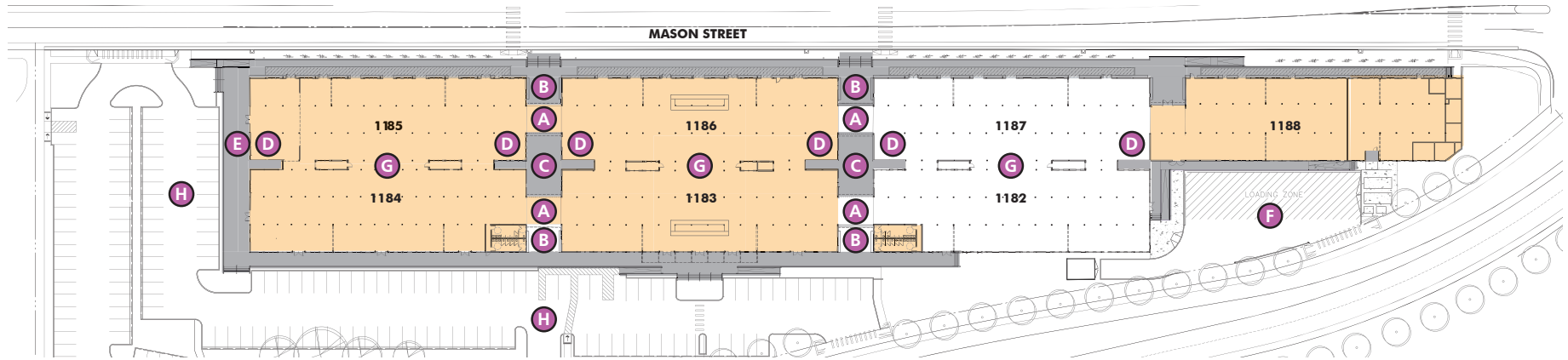
Under the proposed action, the seven warehouses would be used as a sporting goods store and recreational program center (Figure 1). The store would promote healthy lifestyles and enjoyment of the park by offering free fitness classes, facilitating group workouts, and hosting educational and cultural events. While Sports Basement operates on a for-profit basis, the store would also serve to raise money for non-profit groups and share resources in the form of cash and in-kind donations, donated staff hours, free use of store space for community groups, and training clinics on topics relating to sports and the outdoors. The opportunities offered at the store by which the community and visitors can engage with the park and appreciate its resources are provided in Attachment 2.

Building alterations would include conjoining the structures, extending the existing loading docks, inserting new door openings, installing ridge skylights on six of seven buildings, and removing select interior partitions. Following the proposed alterations, there would be approximately 93,000 square feet (sf) of internal space, of which approximately 7,000 sf would be new construction for building connectors, and 16,000 sf of existing and 6,500 sf of new elevated exterior decks.

Uses would include mercantile, assembly and program spaces (both indoor and outdoor), business/office space, and accessory uses (storage, mechanical, restrooms, and outdoor circulation). A breakdown of the building uses is as follows:

Figure 1

SPORTS BASEMENT (PROPOSED ACTION)



PROJECT COMPONENTS

- A** East/west building connectors
- B** Public gathering spaces
- C** Open air courtyards
- D** Preservation of building separation at most significant locations
- E** Western at-grade plaza for community gatherings and events
- F** Loading/trash + recycling areas
- G** North/south building connections
- H** Parking lot



Sports Basement Building Uses

Use	Square Feet	
	Interior	Exterior
Retail	71,000	0
Retail/Assembly/Program (Flex Space)	10,000	0
Assembly	4,500	22,500
Office	5,000	0
Accessory	<u>2,500</u>	<u>0</u>
	93,000	22,500

Project details are provided below.

Outdoor Platforms and Loading Docks

The original loading docks would be retained, widened and made continuous for code compliant access and egress. New plank materials on the north side of Buildings 1185, 1186, 1187 and 1888, in the east-west connections, and on the west and south sides of the warehouses would be oriented perpendicular to the wood planks of the historic loading dock in order to differentiate new material from the old (Figure 2). Ramps would be provided at four locations: at the northwest corner of Building 1188, at the northwest corner of Building 1185, at the southwest corner of Building 1184, and at the east end of Building 1182. Eight short flights of stairs would also be provided, and new metal guardrails with steel flat-bar uprights and steel cable railings would also be installed. Outdoor seating amenities would be provided at the north and south ends of the east-west platforms between buildings. An at-grade plaza for community gatherings and events would be constructed at the west end of Buildings 1184 and 1185 (Figure 3).

Figure 2
ELEVATED DECK



Figure 3

WESTERN PLAZA



Exterior Glazing and Entrances

A new glazed opening would be made at the west end of Building 1185, with an accompanying door so that it could be obscured during non-business hours. Also, three punched openings would be made into the south walls of Buildings 1183 and 1184 to serve as entrances. Glass storefronts would be inserted at the back side of the existing, original barn door entries on the north facades of Building 1185, 1186, 1187, 1888, and the historic doors would be retained in an open position.

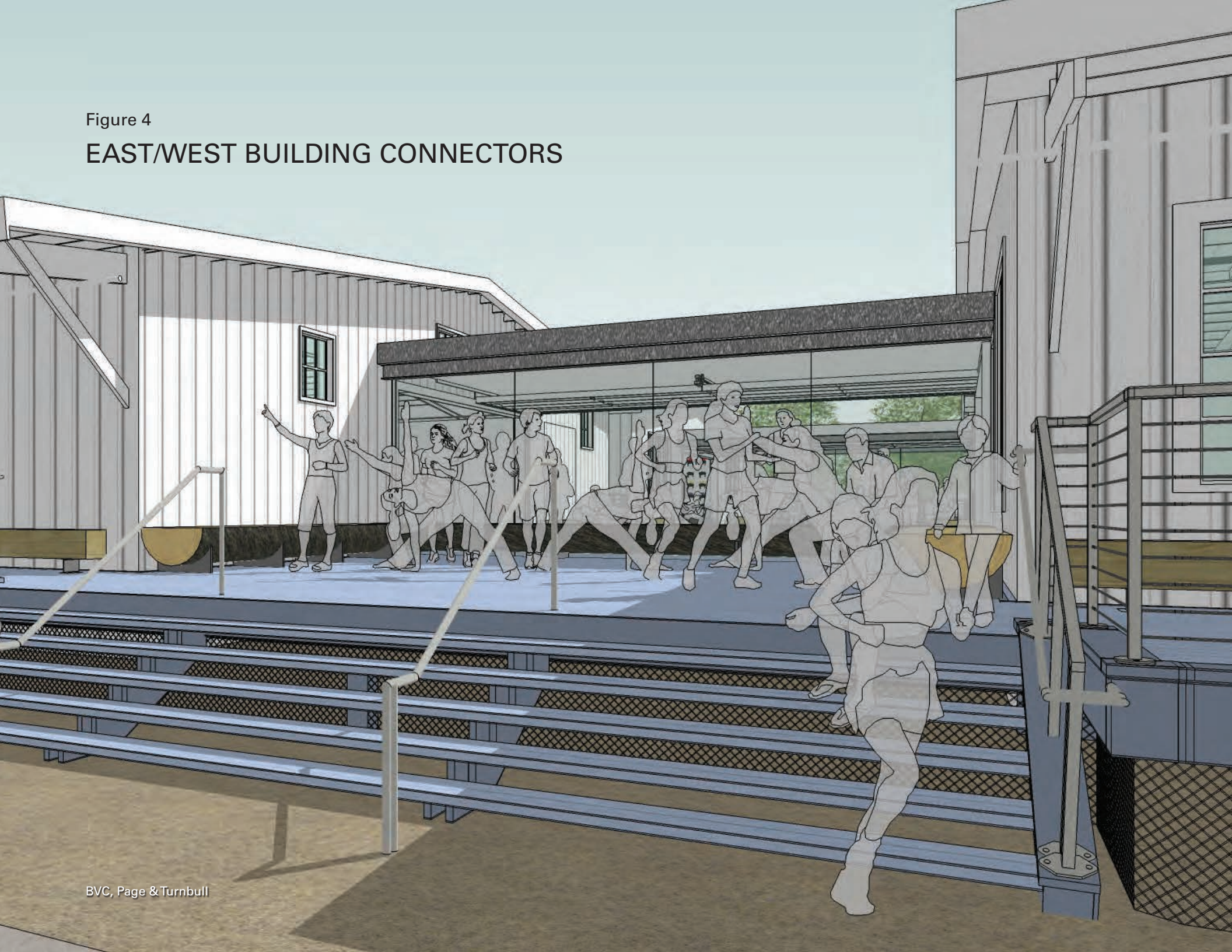
East-West Connectors

Portions of the existing east and west interior walls (8½ feet tall and wide from interior post to post) would be demolished between Buildings 1182 and 1183, 1185 and 1186, 1186 and 1187, and 1187 and 1188. At these locations, the buildings would be joined on the east and west sides via glass-enclosed connectors with solid flat roofs, which would sit on the extended walkway platforms (Figure 4). The post-to-post width would maintain a contiguous experience within the seven buildings and a clear circulation spine in support of new retail use. Between Buildings 1183 and 1184, the material at Building 1183 would be demolished and replaced with a new post-to-post wall opening, but the roughly centered existing 11-foot wide barn door on Building 1184 would be used as the connecting opening. The connection between Buildings 1187 and 1188 would maintain the existing wall and roof structure, but would create the same new post-to-post wall openings at both building as proposed at other connectors.

Open-air courtyards would be located between some of the seven new east/west connectors: one would be located between the Building 1185/1186 connector and the 1184/1183 connector, and another would be located between the Building 1186/1187 connector and the 1183/1182 connector. These courtyards would be accessible from the enclosed connectors via operable glass garage doors. Other existing windows and doors in the east and west elevations would be retained.

Figure 4

EAST/WEST BUILDING CONNECTORS



North-South Connectors

There would be three openings made to create narrow north-south connectors between Buildings 1184 and 1185, 1183 and 1186, and 1182 and 1187 (Figure 5). The roofs of the connectors would be flat and glazed so as to minimize visibility from the surrounding site. Exterior gaps between the buildings would be maintained at the east and west ends of each pair of buildings (in other words, the connectors would be recessed in) to reinforce the nature of the separate buildings. As with the east-west connectors, connecting the buildings at these locations would provide a contiguous experience within the seven buildings while retaining the individual building's historic sense of separation.

Inside the north-south connectors, the new wood flooring would be painted to differentiate it from the historic wood flooring of the warehouses. Between the new north-south openings, portions of historic wall material would be retained, including headers and existing windows in those walls. The retained sections of historic wall would be joined as part of the connector and inserted short east and west walls would create narrow rooms, which would function as storage and HVAC/utility closets.

Other Building Improvements

Most non-contributing interior partition walls would be removed, along with select contributing interior partition walls. However, the partition walls at the east end of Building 1188, along with contributing rooms in Buildings 1182, 1186 and 1185 would be retained in place to support interior retail and office functions. Seismic upgrades would be provided in the form of interior steel moment or braced frames, which extend inward from the exterior walls; plywood sheathing on the inside face of some perimeter walls and over the straight roof sheathing at the roof diaphragm to the new collector beams; and new grade beam foundations and wood sheathed cripple walls to support the frames and shear walls and resist lateral forces.

Figure 5

NORTH/SOUTH BUILDING CONNECTIONS



As mentioned above, HVAC and other utility closets would be provided between original north-south walls. Low-profile fresh air intake and exhaust air equipment would sit upon the roofs of the north-south connectors at the valley between the gable roof buildings. Distribution ductwork would be located under the floor. New translucent roof panels would be inserted at the ridgelines of the roofs on six of the seven buildings (1185 excluded), replacing several, randomly placed existing skylights. They would be flush with the roof profiles to minimize their appearance from the exterior and would provide light to the interiors of the buildings (Figure 6).

Parking Lot

A 213-space parking lot would be constructed as part of the Presidio Parkway project to the south and west of the buildings. It would include a loading, trash and recycling area and handicap-accessible parking. Parallel parking spots would also be available on Mason Street in front of Buildings 1187 and 1188.

CULTURAL AND EDUCATIONAL CENTER/OFFICES (PTMP ALTERNATIVE)

The Cultural and Educational Center/Offices alternative is considered the required NEPA “no action” alternative to serve as a benchmark for comparison, allowing the reader to understand the extent to which the project is consistent with the adopted management approach and intensity of building use provided for in the PTMP. There is currently no tenant or funding source for the PTMP alternative.

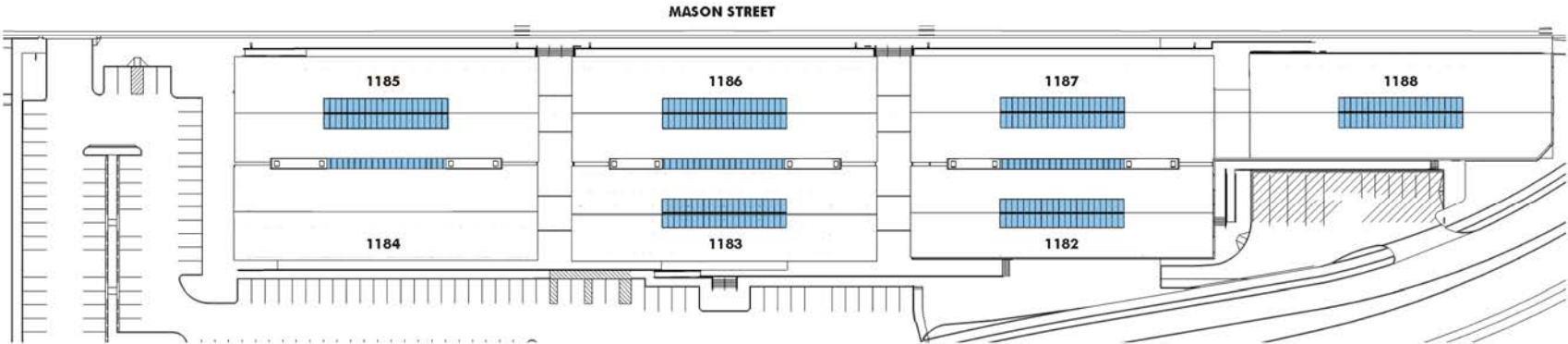
Under this alternative, the complex of rehabilitated buildings would be used for multiple purposes, including visitor-oriented and office uses (Figure 7). Three of the four warehouses along Mason Street (Buildings 1186, 1187 and 1188) would include cultural facilities and educational programs “celebrating the area’s diverse historical, cultural and natural resources.”⁴ Under the PTMP, amenities could include visitor facilities, interpretive sites, exhibit space, museum use, performing arts, community or training facilities, artists’ studios, education centers, libraries and archives, and classrooms.⁵ Activities and events within the

⁴ PTMP, [Crissy Field] Character, Land Use and Open Space, page 71.

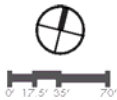
⁵ See cultural and educational uses assumed in the PTMP, PTMP EIS, page 269.

Figure 6

PLAN VIEW SHOWING SKYLIGHTS



Skylight



three buildings would help continue the transformation of the eastern end of Crissy Field into a “friendly, welcoming place” and “popular bayfront park.”⁶ Building 1185 and the three warehouses that do not border Mason Street would be used for offices, both non-profit and for-profit. A breakdown of the building uses is as follows:

Cultural and Educational Center/Offices Building Uses

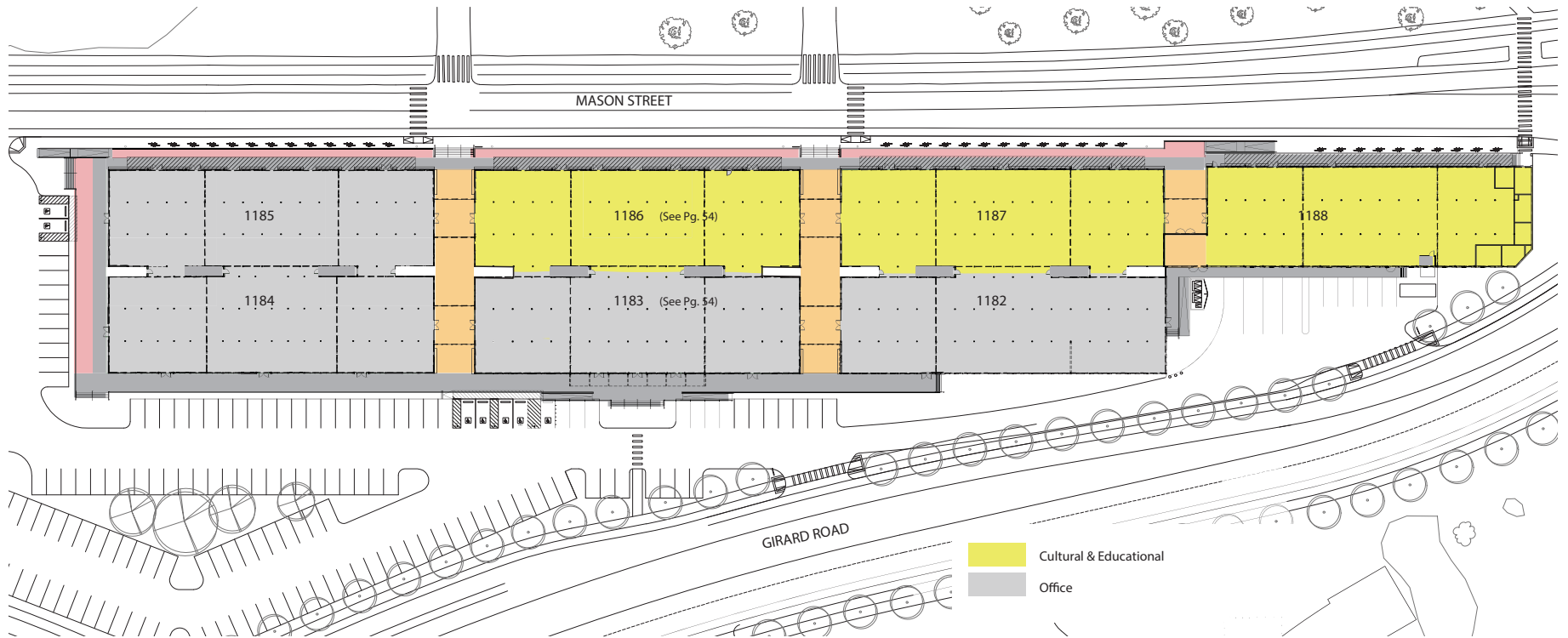
Use	Square Feet
Cultural and Educational	40,000
Office	<u>53,000</u>
	93,000

Rehabilitation work would include interior and exterior modifications, site improvements, landscaping and code compliance necessary to provide access and preserve the character of the property, to repair deficiencies, and provide for the proposed uses. East/west connectors between the buildings would be provided, but would be configured as covered, enclosed passageways to allow separate tenant entry points and addresses for the different tenants. All improvements would comply with the Secretary of the Interior’s Standards for Rehabilitation as well as all applicable building, fire and life safety codes.

⁶ PTMP, [Crissy Field] Planning Concept, page 70.

Figure 7

CULTURAL AND EDUCATIONAL CENTER/OFFICES (PTMP ALTERNATIVE)



OTHER ALTERNATIVES

The following briefly summarizes additional alternatives that the Trust considered for inclusion but have been eliminated from further study in this EA.

Warehouse

Under this alternative, the buildings would be used for general storage and warehouse use as previously carried out as part of the Trust's short-term leasing program for the buildings. Warehouse use in the past has helped to occupy and stabilize the buildings. However, warehouse use has not proved attractive to third-party investment that is necessary for preserving and reusing the buildings in the long-term. Furthermore, warehouses would not accomplish the important PTMP objective for Crissy Field uses to complement the extraordinary bayfront park and destination that the district has become. Because warehouse use does not provide the financial means to rehabilitate the buildings and does not contribute to the Trust's larger vision for Crissy Field as a visitor-oriented district as identified in the PTMP, this alternative was rejected.

Sports Basement at Former Commissary Site

The PTMP identifies a cultural institution as the preferred use for the former Commissary site. A cultural use was widely supported by the public and is a key component of the Trust's balanced use of the Presidio's built space (one-third for housing, one-third for office or principally revenue-generating uses, and one-third for cultural, educational, and public-serving uses). Retaining the Sports Basement as a long-term tenant at the former Commissary site does not meet the objectives of the PTMP and was eliminated from further analysis. The site is one of the most prominent around the San Francisco Bay. With the adjacent landscaped connection between the waterfront and the interior of the Main Post that is made possible by the new Presidio Parkway tunnel tops, the site would assume a critical importance as a public

gateway to the Presidio. The Trust has developed design guidelines (Trust 2011) for the site in anticipation of the completion of the Presidio Parkway. The design guidelines are derived from the PTMP and will be used by the Trust to help shape future proposals and guide decisions at the site.

Sports Basement at Other Alternative Sites

Buildings or groups of buildings at the Presidio that provide the opportunity to rehabilitate and occupy approximately 90,000 sf of contiguous building space are extremely limited. These buildings include the seven Gorgas warehouses (approximately 12,000 sf each) and the six Montgomery Street barracks (approximately 40,000 sf each). More than half of the Gorgas Avenue warehouses are leased and would not allow for the total square footage required. Four of the six Montgomery Street barracks buildings are currently occupied by long term uses. The remaining two vacant buildings are not adjacent to one another and would not allow for the retail use. To operate effectively as retail space, the interior walls of several of the barracks buildings would need to be gutted, resulting in an adverse effect to the historic properties.

Additionally, the buildings are located in the more interior areas of the Presidio, which would increase traffic in these areas due to the relocation. Finally, the buildings do not allow the sporting goods store to take advantage of the outdoor resources of Crissy Field that the store has incorporated into its public programming, or allow for immediate access to users of Crissy Field, many of which have come to rely on Sports Basement for their products.

ENVIRONMENTAL CONSEQUENCES

This section provides a discussion of the environmental impacts of the proposed action and the PTMP alternative. The discussion focuses on issues and concerns raised during scoping for which information is provided. Within each resource area, current conditions are first described, followed by a separate discussion of the proposed action and the PTMP alternative, and concluding with a significance determination.

LOS A corresponds to spacious and comfortable conditions (all visitors have unimpeded, scenic views and/or comfort).

VISITOR USE AND EXPERIENCE

The current relevance of the Mason Street warehouses to most visitors as they enter the highly accessible Mason Street Gate may be characterized as non-existent to very low. The warehouses are hardly noticeable due to their modest scale and vacancy, and despite the buildings' historic significance, their relationship to the park is not readily apparent. Their idle condition conveys limited attractiveness to passers-by travelling to more interior destinations within the park. The lack of visitor facilities is in stark contrast to the educational and recreational stewardship opportunities that abound within the landscaped and restored natural coastal environment of the East Beach portion of Crissy Field (Area A) north of Mason Street.

The East Beach shore is located 660 feet (1/8 mile) from the project area. The East Beach shoreline is separated from the project area by Mason Street, berms, an unpaved overflow parking area, and a paved parking lot. Public access along East Beach in the vicinity of the project area as well as along the entire Crissy Field shoreline from East Beach to Fort Point is unrestricted. Direct access to the San Francisco Bay is possible in most locations, except in limited areas where protective bulkheads or riprap are present. East Beach provides access to a highly regarded board sailing area offshore and is a popular launching site for windsurfers, kite surfers, and non-motorized watercraft users such as kayakers. Visitor use facilities on East Beach include the Golden Gate Promenade/Bay Trail, the "temporary" Crissy Field Center (operated by the Golden Gate National Parks Conservancy, which provides numerous stewardship, interpretive and educational opportunities and environmental programs for children and families), several picnic areas, parking, and restroom and shower facilities. Other popular activities conducted in the area include hiking, jogging, bike riding, wildlife viewing, dog walking and sun bathing.

Visitors to East Beach come as individuals, as families, as part of private and commercial tour groups, and educational groups (schools, summer programs, youth groups, fitness

groups, and after-school programs, etc.). East Beach is active as early as 4 am with a variety of visitors, including joggers, cyclists, pedestrians and rollerbladers. Visitor use statistics collected for the 34th America's Cup Races EA (NPS, et al. 2012) indicate that there is only minor crowding on most existing weekdays and weekends, with between 150 (weekday) and 360 (weekend) people counted at one time during the peak period of the day. The estimated level of service (LOS) is "A" (NPS, et. al. 2012). However, access to Crissy Field is difficult on weekends when there is good weather and special events are taking place.

The primarily flat, open spaces of Crissy Field, including East Beach, are a popular location for organized special events, in addition to other daily recreational activities. Special events are scheduled at East Beach almost monthly and have included:

- Alcatraz Challenge Swim & Run
- Windsurfing Nationals
- Outrigger Canoe Races
- Juneteenth Triathlon
- Swim Across America
- Junior Windsurfing World Championships
- Northern California Outrigger Canoe Association Race
- Laser Masters Worlds
- 18-Foot Skiff International Regatta

All special events at East Beach are managed 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 National Park Service Management Policies, Director's Order 53 Special Park Uses, and the GGNRA Superintendent's Compendium (updated annually). Special Use permits are issued for the East Beach area 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. Both the NPS and the Trust coordinate management actions and protection measures to control visitation to ensure that safe conditions are maintained and appropriate uses of the park can be enjoyed by visitors.⁷ Permits are denied if special events would result in significant conflict with other existing uses or program activities.

Each special event permit includes limits on numbers of participants and in no instance does the number of permitted participants in an event exclusively at East Beach exceed 500. Events are rarely held after 11 am, and never close areas to non-participants unless an overriding reason is present. Events are not allowed to block trails anytime, and must share the area and minimize disturbance to other users. Roadway closures are for motorized vehicles only, unless safety necessitates also closing the area to bicyclists and/or pedestrians, and the public is notified well in advance of the closure.

Special event schedules are based on parking availability, and events are regulated to ensure that parking supply meets expected demand. Events are never scheduled whereby 50 percent of the total available parking at East Beach would be used by event goers. Events not located near East Beach are not permitted to park in the East Beach area. Permits issued for major events include parking management strategies to encourage alternative modes of travel and maximize use of the limited parking spaces that are provided. The NPS has

⁷ See Table ALT-2: Summary of Management and Protection Measures on pages 2-29 – 2-51 in the 34th America's Cup Races EA. (<http://www.parkplanning.nps.gov/document.cfm?parkID=303&projectID=38234&documentID=47940>) and Visitor Experience Mitigation Measures CO-4 – CO-8 on page 296 of the PTMP EIS (<http://www.presidio.gov/about/Pages/Presidio-Trust-Management-Plan.aspx>). United States Park Police manages traffic during large special events at Crissy Field.

Existing visitor experiences and uses would be adversely affected if the management and facilities capacities of the East Beach portion of Crissy Field (Area A) is exceeded and visitor density becomes unsafe and/or unsatisfactory.

For the proposed action's and PTMP alternative's impact on the East Beach parking area, refer to the discussion on parking below.

initiated "quiet days" (i.e., no events bigger than a small wedding or pass-through run with no equipment) on two Saturdays and two Sundays of every month.⁸

Because special events at East Beach do not unreasonably interfere with traffic, visitor access to parklands or facilities, or visitor activities, and are not granted exclusive use of the area, the ongoing impact is considered minor.

Would the relocated Sports Basement adversely affect the existing visitor experiences and uses of parklands?

Sports Basement would transform the empty Mason Street warehouses into welcoming spaces that would improve visitor opportunities and engage the community within the park. The retail store would offer opportunities for patrons and visitors to shop for goods to exercise, enjoy natural settings, and participate in outdoor recreational activities. Visitors would also be able to participate in a wide variety of programs that would be offered. Based on traffic, sales and survey data provided by Sports Basement, during the peak period of the day, as many as 777 (weekday, 5-6 pm) and 1,171 (weekend, 2-3 pm) people would be entering or leaving the store for shopping or attending community events (see table below).

⁸ Personal communication with Noémi Margaret Robinson, Chief of Special Park Uses, Golden Gate National Recreation Area.

Sports Basement Visitors

	Weekday Peak Hour (5-6 pm)	Weekend Peak Hour (2-3 pm)
Square Feet	93,000	93,000
Rate (vehicle trips/kgsf)	2.9-3.2	4.9-5.5
Vehicle Trips (one-way)	270-298	456-512
Persons per Vehicle ^a	1.854	1.854
Person Trips by Vehicle (one-way)	500-552	845-948
Person Traveling by Vehicle ^b (%)	71	81
Total Person Trips (all modes, one-way)	704-777	1,043-1,171
Percentage of Patrons at Crissy Field (Area A) (%)	2-5	2-5
Person Trips to/from Crissy Field (Area A)	35-39	52-59

^a City and County of San Francisco, San Francisco Planning Department 2002.

^b TKJM Transportation Consultants 2011.

Sports Basement would typically host 4 programs (1 in the daytime; 3 in the evening) per day lasting 1 to 5 hours each. Programs would attract between 10 and 100 participants but this would vary widely depending upon the event. No events would be held outside the building premises. Additional details on Sports Basement community engagement and visitor opportunities are provided in Attachment 2 of the EA.

The Trust estimates that of the 704 to 1,171 people entering or leaving the store during the peak hour, 35 to 59 would also be visiting recreational activities in the area, including East Beach. According to Sports Basement, bike riding to Golden Gate Bridge along the Mason Street bike path and kite flying on Crissy Airfield are among the more popular activities of Sports Basement patrons recreating in the park.

The shoreline would continue to be accessed from Mason Street after relocation of Sports Basement, although access improvements are being considered in conjunction with the evaluation of the permanent location of the Crissy Field Center. The current access to the Bay shoreline and to nearshore amenities, such as the beach and Golden Gate Promenade/Bay Trail, would be unaffected by the proposed action. No access pathways to the Bay would be blocked or altered by the project, and no changes would occur in or near areas used for board sailing, dog walking and other recreational activities. With Presidio-wide parking management in place (see PTMP Mitigation Measure TR-21), individual users and groups that utilize the East Beach would continue to be able to use the area without interruption. East Beach visitors would be largely unaware of impacts associated with the proposed project uses, as there would be little change in the level of activity occurring in Area A. Many visitors' satisfaction and enjoyment would continue due to the availability of nearby recreational goods and services at the retail store for their outdoor activities. The programs offered at the retail store would also maintain a channel through which participants engage with the park, providing an opportunity for visitors to strengthen their ties to the park.

The Trust would require appropriate permit conditions for organized events affiliated with Sports Basement and would schedule/coordinate such events with the NPS to minimize visitor use impacts and ensure that park resources are protected (PTMP EIS Mitigation Measure CO-7 *Special Events*).

Cultural and Education Center/Offices

Under this alternative, various individuals participating in the uses at the warehouses may begin using East Beach due to their introduction to the area, while others would opt for other non-East Beach leisure activities. Current East Beach visitors would be largely unaware of any increase in visitation. Any changes in the number of visitors at East Beach would be slight, but would not appreciably limit overall visitor satisfaction or affect visitor safety. No degradation of recreational facilities, additional user conflicts, or out-of-area displacement would occur.

Conclusion

Neither the proposed action nor the PTMP alternative would adversely affect the existing visitor experiences and uses of parklands. The relocation of Sports Basement from the Commissary site to the project area would not result in any noticeable change to recreational and visitor uses. Programs and services would continue to provide opportunities for engagement in the park, which would maintain visitor satisfaction, enjoyment and understanding. The Cultural and Education Center/Offices may increase visitor use, but would not appreciably limit or enhance existing visitor satisfaction or visitor safety.

TRANSPORTATION

The most recent analysis of the intersection at the Marina Gate is based on traffic counts collected in September 2014. The signalized intersection at the Marina Gate currently operates at LOS C on weekday PM peak hour and LOS C during the peak hour on a Saturday. The LOS C conditions reflect September 2014 traffic volumes and signal timing and phasing adjustments made by the San Francisco Municipal Transportation Agency (SFMTA) in May 2014.

Other changes would affect circulation patterns near the Mason Street warehouses. A 210-space parking lot on the south and west sides of the warehouses would be constructed as part of the Presidio Parkway project. The design drawings for the lot include several changes that would improve current pedestrian safety and minimize traffic impacts, particularly near the gateway to the Presidio. The parking lot would be directly accessible from Girard Road as well as Mason Street. Girard Road will have a raised landscaped median, and therefore the Girard Road driveway would only be able to accommodate right turns into and out of the parking lot, but would reduce the volume of traffic traveling through the Marina Gate to/from these warehouses. Secondly, the existing small parking area immediately east of Building 1188 will be removed and replaced with landscaping, eliminating this conflict point from the influence area of the Mason/Marina/Lyon intersection, and allowing the future sidewalk on the south side of Mason Street to be extended eastward to the Marina/Girard/Lyon intersection. Most of the on-street parallel parking along the south side of Mason Street would be removed to provide space for a sidewalk.

Other circulation changes are expected on the north side of Mason Street. The Crissy Field Center is temporarily located at the east end of Crissy Field (East Beach). The NPS assumes that the building would remain in use into the foreseeable future, and is considering changes to the vehicular access to East Beach to minimize conflicts with trail users on the multi-use path along the north side of Mason Street. The current driveway to the East Beach parking lot separates inbound and outbound traffic into two separate driveways approximately 225 feet apart. The current exit driveway from the East Beach area is approximately 300 feet from the planned driveway location for the parking lot serving Buildings 1182-1188. This spacing is adequate to provide visibility for motorists or cyclists to safely exit either driveway. Spacing between these driveways should be considered as plans evolve for possible circulation changes at the East Beach area.

Would the relocated Sports Basement substantially increase traffic congestion, traffic volume, or adversely affect traffic safety for vehicles, pedestrians and bicyclists?

Since the Commissary is a similar size as the Mason Street warehouses, the proposed relocation of Sports Basement from its current location to Buildings 1182-1188 farther east on Mason Street would result in a similar level of traffic as it does today, approximately 270-300 vehicle trips in the weekday PM peak hour. The project area is closer in proximity to MUNI lines 30 and 30X and also closer in proximity to the Marina residential area of San Francisco. The parking lot to the south and west of the buildings would be subject to parking fees, and bike parking would be provided. As a result, it is expected that more people would walk, bike or take transit to Sports Basement compared to its current location, potentially resulting in a slight reduction in traffic generated by the project. When combined with the recent occupancy of recreational uses at the west end of Crissy Field, a cultural institution at the Commissary site, an aquatic and fitness center at the west end of Crissy Field, and the warehouse use in Building 643, the changes in trip generation from that analyzed in the Main Post Update EIS (Trust 2010) are minor. As shown below, overall weekday PM peak hour vehicle trips generated by the district would be slightly reduced from what was analyzed in the Main Post Update EIS, and slightly greater than what was analyzed in the PTMP EIS. Sports Basement would comprise approximately 15 percent of the square footage in the Crissy Field (Area B) district, and would generate about 25 percent of the 1,151 weekday PM peak hour vehicle trips.

PM Peak Hour Vehicle Trips Generated in Crissy Field (Area B) District

	PTMP EIS	MPU EIS	Future w/ Proposed Action
PM Peak Hour Vehicle Trips	1,078	1,201	1,151

Traffic counts collected in September 2014 indicate traffic volume through the Marina Gate was 708 vehicles per hour during the weekday PM peak hour and 941 during the Saturday peak hour. The intersection at the Marina Gate was determined to operate at LOS C during the weekday PM peak hour and LOS C during the peak hour on a Saturday⁹ The relocation of Sports Basement from its current location to Buildings 1182-1188 would not appreciably change the current intersection operation. The Main Post Update EIS forecasted this intersection to operate at LOS C in year 2030. With the revised signal phasing and cycle time, the intersection is expected to operate at LOS D in the weekday PM peak hour in the future, however the signal timing would likely need to be revisited in the future.

Marina Gate Volume and Intersection Level of Service

	Weekday	Weekend
Peak Hour Volume through the Marina Gate (2011) ^a	708	941
Peak Hour Volume entering Marina-Mason-Lyon Intersection	1,974	2,260
Marina/Mason/ Lyon Intersection Level of Service (2014) ^a	C	C

^a Presidio Trust.

Occupancy of Buildings 1182-1188 is anticipated to draw visitors from East Beach and also prompt Sports Basement customers to visit the area, particularly if the Crissy Field Center is retained permanently. Pedestrian access to East Beach is currently provided via a diagonal path connecting to Mason Street farther east, near the Marina Gate. Sports Basement’s

⁹ The Sports Basement EA released in October 2013 cited the intersection as operating at LOS F in the weekend peak hour as erroneously identified in Table TRA-1 of the 34th America’s Cup Races EA. At the time of the publication of the 34th America’s Cup Races EA, the intersection operated at LOS D in the weekend peak hour, as correctly noted in later tables in the EA. The San Francisco Municipal Transportation Agency changed the signal timing of this intersection in May 2014, improving the weekend peak hour operation to LOS C.

occupancy of Buildings 1182-1188 would reinforce the need for a pedestrian crossing of Mason Street farther west. The Trust would coordinate with the NPS to determine the most appropriate location for the pedestrian crossing and how to integrate with proposed circulation changes at East Beach.

Cultural and Education Center/Offices

This alternative would generate less traffic than the proposed action. Approximately 130 vehicle trips would be generated in the weekday PM peak hour, or 40 to 50 percent of the vehicle trips currently generated by Sports Basement in the weekday PM peak commute hour. The number of weekday PM peak hour vehicle trips for the district would be approximately 12 percent less than with the Sports Basement alternative.

Conclusion

Neither the proposed action nor the PTMP alternative would substantially increase traffic congestion. The planned changes to the parking lot surrounding Buildings 1182-1188 would slightly reduce the volume of traffic through the Marina Gate and on Mason Street. The planned sidewalk on the south side of Mason Street would improve pedestrian safety.

PARKING

The parking lot on the south and west sides of the Mason Street warehouses is being designed and constructed as part of the Presidio Parkway reconstruction project. The Trust intends to charge parking fees after the lot is constructed to discourage single-occupant automobile use, encourage turnover of parking spaces and promote more sustainable means of travel. Trust planning efforts implementing the PTMP are geared toward limiting parking supply to the extent possible without impeding the Trust's ability to attract tenants to reuse historic buildings, and designing parking facilities to accommodate average rather

Parking: Not a Significant Effect Under NEPA

The Trust does not consider a lack of parking supply 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 decisionmakers, and therefore provides the following parking analysis for informational purposes only.

than peak demand.¹⁰ Design plans indicate the parking lot would have approximately 210 parking spaces.

Parking at East Beach (Area A) can accommodate approximately 370 cars. Paved parking is available for 211 cars and unpaved parking is sufficient for 159 cars (NPS 2009). The unpaved area is used for overflow parking when demand for parking is high, such as during special events and on weekends. Parking demand varies depending on the day of week, time of day, and season. On most days, parking demand at East Beach is well under capacity but is practically at capacity (90 percent utilized) during peak season weekends (NPS et.al. 2012).

During peak event days, the NPS and the Trust currently implement several measures identified in their respective transportation demand management (TDM) programs that result in more efficient use of the parking spaces provided. These measures include providing and encouraging alternate means of transportation, such as public transit (including the PresidiGo Shuttle), bicycling, walking and carpools, providing for satellite parking facilities, and requiring valet service. The General Management Plan Amendment (GMPA) (NPS 1994) also calls for fees and time limitations, which have been used elsewhere within Area A to manage parking.¹¹ However, parking at East Beach is currently unrestricted (i.e., no time restrictions and free).

Would the parking demand associated with the relocated Sports Basement be accommodated within the proposed supply?

The parking demand associated with Sports Basement customers and employees would generally be accommodated within the parking supply by the new lot and on-street stalls. Based on surveys of Sports Basement in its current location where parking is currently free

¹⁰ PTMP, Parking Management, page 51.

¹¹ GMPA, Parking Management, page 48.

and unregulated, Sports Basement is expected to have a weekday (average) demand of approximately 125 parking spaces and a weekend (peak) demand of approximately 185 parking spaces, which would be adequately accommodated within the total supply of 210 spaces in the proposed parking lot. However, since parking management (fees) would be used to discourage single-occupant automobile use by Sports Basement employees and customers and to encourage transportation alternatives, it is possible that some drivers may seek currently unmanaged parking at East Beach. Any spillover could be limited by implementation of a parkwide approach to discouraging automobile use and promoting more sustainable means of travel as identified in the following excerpted PTMP EIS and GMPA EIS mitigation measures:

TR-21 Presidio-Wide Parking Management. In order to reduce impacts of fee parking in Area B on parts of the Presidio outside the Trust's jurisdiction (Area A), the NPS is encouraged to implement parking regulations, time-limits and/or parking fees in potentially affected parking areas under its administration (notably, Crissy Field). The Trust would provide assistance to the NPS to ensure coordination and consistency of parking management within both Areas A and B...¹²

Parking Fee Support of Transit Services. The Park Service would consider implementing parking fees in certain areas to further discourage automobile use and to offset the costs to provide transit services...¹³

Should the NPS choose not to adopt or enforce either of these measures, visitors arriving to East Beach during peak weekends could have difficulty parking.

¹² PTMP EIS, Parking, page 326.

¹³ GMPA EIS, Traffic and Transportation Systems, page 27.

Cultural and Education Center/Offices

The parking demand associated with this alternative would be approximately 167 spaces on weekdays and 63 spaces on weekends. Thus, the proposed parking lot would be able to accommodate the PTMP alternative's parking demand.

Conclusion

The proposed parking lot to the south and west of the Mason Street warehouses would have adequate capacity to accommodate parking demand from either the proposed action or the PTMP alternative. TDM strategies including parking management in Area B would encourage the use of alternative modes and minimize parking demand. Implementing parking management strategies in Area A as encouraged in the PTMP EIS and outlined in the GMPA EIS would mitigate the potential effect on parking conditions in Area A.

HISTORIC RESOURCES

The following discussion is largely adapted from the Historic Resource Evaluation (Page & Turnbull 2013) prepared for the Trust in support of the NHPA consultation on the project.

The U.S. Army constructed the Mason Street warehouses at the northeastern corner of the Presidio, bordering Mason Street, between 1917 and 1919 when the Presidio was becoming a major supply depot. The buildings have been used since for warehouse storage, administrative offices and workshops. Although located within the Presidio military reservation, they were connected by rail to the piers at Fort Mason's Quartermaster Depot and Port of Embarkation. Supplies and equipment arriving by ship were unloaded at Fort Mason and transported using the U.S. Army's belt railway to the Presidio where it was stored in the Mason Street warehouses.

The Mason Street and nearby Gorgas Avenue 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. Each warehouse was roughly 60 feet by 200 feet in size, and built in a simple, utilitarian manner to meet its functional requirements.

Constructed in two rows parallel to the street, the warehouses facing the street had raised loading docks level with the arriving trains so that goods could be easily transferred. Goods would have been moved through the street-facing warehouse into the rear warehouse, via enclosed connectors or hyphens which link the buildings. Over time, these connectors were modified, moved and expanded to accommodate different uses and storage of different types of material. For the most part, the buildings have open interiors designed to provide open floor space for storage. However, small offices, bathrooms and other enclosed rooms were added within the open volumes to provide usable space for secondary building uses.

The present-day site of the Mason Street warehouses was originally a saltwater slough that was filled for use by the Panama-Pacific International Exposition, and then returned to the U.S. Army at the close of the Expo in 1915. The area directly across Mason Street from the warehouses functioned as a mobilization and demobilization site for both World Wars, which resulted in the construction and subsequent removal of dense clusters of buildings at either end of both conflicts. After World War II, the use of the Mason Street warehouses continued to evolve, reflecting the shift throughout the Presidio from mobilizing troops and materials in support of a war to more administrative activities. 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 and removed the majority of the tracks, leaving a single representative line buried under asphalt. The U.S. Army continued to use the Mason Street warehouses as back-of-house workshops and office space through the end of their tenure at the Presidio, making small repairs and modifications to the buildings up to 1994.

In the early 2000s, the Trust fitted out Buildings 1182, 1187 and 1188 to serve as the Exploratorium's exhibit design workshop and offices. The other buildings remained in use as storage or were vacant. The largest changes to the Mason Street warehouses during the post-U.S. Army years occurred in their setting, with large-scale landscape re-design, habitat restoration, removals of buildings and paved areas north of Mason Street and west of the warehouses, and the replacement of Doyle Drive with the Presidio Parkway. In 2000, the NPS

oversaw the rehabilitation of Crissy Field, which included the removal of approximately 15 buildings and associated paved areas directly across Mason Street from the warehouses in order to create walking and biking trails and a landscaped area. The Trust completed plans in 2010 to “daylight” the northernmost extent of the Tennessee Hollow watershed immediately to the west of the warehouse complex, which will replace large paved areas and former building sites with marshland, riparian habitat and trails. 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). Although the buildings themselves remained largely unchanged, these projects substantially altered the warehouses’ setting from its appearance at the end of the World War II. Despite these changes, the buildings and their relationship to Mason Street retain sufficient integrity so as to contribute to the Presidio NHL district.

Would the relocated Sports Basement adversely affect any historic buildings or landscape features or the Presidio NHL district?

Historically, the Mason Street warehouses were used as warehouse and later as office space. The proposed action would change the use of the buildings into open-space retail use. The new use would require changes to some of the distinctive materials, features, spaces and spatial relationships, including the overall form and massing, board-and-batten and stucco siding, exposed interior structural systems and raised access platforms/loading docks. The large open interior spaces are conducive to a retail use, and the docks would be used for exterior circulation. Some historic fabric would be removed and the relationship of the warehouse buildings would be reconfigured, but not to the extent that the historic character of the Mason Street warehouses would no longer be communicated. Some distinctive features, spaces or spatial relationships that characterize the property, in particular the original configuration of the buildings as seven separate (but interrelated) warehouse buildings would be altered. The proposed seismic, accessibility, building code and system

upgrades, along with the tenant-specific elements that support the adaptive reuse, would retain the majority of the buildings' character-defining features and overall historic character and place the buildings back into service, thus constituting a beneficial impact.

The most substantial alterations to the project area would include connecting the buildings north/south and east/west, extending the existing loading docks, inserting new door openings, installing low-profile translucent roof panels at the ridgeline, and selective removal of non-historic and contributing interior partitions. Portions of the north and south walls between the two rows of buildings would be removed in order to create a regularized series of connections between Buildings 1184 and 1185, 1183 and 1186, and 1182 and 1187. However, sections of those walls, with their historic windows, would remain in place in order to retain historic material and convey the historic separation of the pairs of buildings. The demolition required for the north-south connectors would be minimized so as to accomplish the programmatic objective of providing a contiguous experience of a single retail entity within the seven buildings, while maintaining historic fabric to convey a sense of historically separate buildings as much as possible.

New elements of the project have been designed in a contemporary yet compatible manner. The design of the east-west connectors is simple, transparent, recessed from the north and south wall planes of the historic buildings, and with low flat roofs. New features would allow the buildings to read from the exterior as separate structures while preserving the spatial relationships between each warehouse structure. The extension of the existing loading dock would not require the removal of historic fabric, and would allow the dock to remain a prominent feature of the property. The six ridge skylights would be flush with the roof, therefore avoiding alterations to the roof profile and overall form of the buildings. At the rear (south) elevation of Building 1188, a loading dock would be added and enlarged openings would be created for merchandise deliveries. The proposed guardrails at the deck edges would be of contemporary yet industrial design and create a minimal intervention through the use of steel flat-bar uprights with steel cable railings.

On the interior, several partitions date to the warehouses' period of significance (1917 and 1919-1945), but are not essential to the buildings' ability to convey their significance as utilitarian warehouses built to support the U.S. Army's movement of supplies via rail to and from the Presidio. Several historic partitions would be re-used, such as those at the east end of Building 1188. The overall interior treatment would retain the open floor plans, exposed structure and flooring that are character-defining elements of the buildings. Alterations to the buildings that have gained significance, such as the circa 1937 application of stucco finish and a clay tile parapet to the east and south façades of Buildings 1182 and 1188, presenting a Mission Revival façade to those viewing the warehouses from the Golden Gate Bridge approach, would be retained and preserved.

Changes to the surrounding landscape to accommodate new parking, sidewalks and bike lanes would not affect the few remaining historic landscape features (such as the buried Mason Street rail lines) and would be compatible with the landscape character and other similar improvements at Crissy Field.

Based on consultation with the NPS and SHPO, the Trust has reached a finding of "adverse effect" to the Mason Street warehouses. The finding is based on the amount of historic fabric removed from the warehouse structures and is limited to the buildings themselves, and not the adjacent landscape features or NHLD as a whole. The localized nature of the effect on historic resources does not constitute a significant impact under the NEPA.

Cultural and Education Center/Offices

The PTMP alternative would incorporate many of the same elements as the proposed action, including full seismic, accessibility, building code and system upgrades in order to create seven separately-occupied tenant spaces. The alternative would constitute a beneficial impact to the historic buildings and landscape through the rehabilitation and reuse of these historic resources. Similar to the proposed action, rehabilitation work would include interior

and exterior modifications, site improvements, landscaping and code compliance necessary to preserve the character of the property, to repair deficiencies, and provide for the proposed uses. The primary difference between the two actions is that the PTMP alternative would not require the creation of several new north/south openings between Buildings 1184 and 1185, 1183 and 1186, and 1182 and 1187, as proposed by the Sports Basement so that the seven buildings may serve a single tenant. East/west connectors between the buildings would be included, but would consist of an enclosed, lobby-like volume (similar to those used at the Gorgas Avenue warehouses). The loading dock on the south elevation of Building 1188 would not be required, so that elevation would remain un-altered from its current form. All improvements would comply with the Secretary of the Interior's Standards for Rehabilitation, along with the PTMP Planning Principles and Guidelines for the Crissy Field (Area B) district.

Conclusion

The proposed action would result in a localized adverse effect to the Mason Street Warehouse buildings due to historic fabric removal and the reconfiguration of the seven separate buildings into a single retail use. However, neither the proposed action nor the PTMP alternative would significantly impact the Mason Street warehouses or surrounding historic resources at the Presidio. Rehabilitation, seismic and system upgrades, and the return of these buildings to use would have a beneficial impact, as would the installation of landscape, parking and site circulation features that are compatible with those completed elsewhere in the district.

ARCHAEOLOGICAL RESOURCES

Prehistoric Sites at the Presidio do not Contribute to the Presidio NHL district

Prehistoric sites predate the period of significance (1776-1945) and are not associated with the military history that forms the basis of Landmark designation. Prehistoric sites may, however, be considered individually eligible for the National Register of Historic Places (NRHP). Archaeological research conducted for updates to the Presidio's NHL district has identified "areas of known or predicted prehistoric archaeological potential" based on models of prehistoric settlement patterns (see Figure 16 of the PTMP EIS).

Buildings 1182-1188 are located within Crissy Field, an area of predicted prehistoric archaeological sensitivity. There are three known prehistoric archaeological sites (subsequently combined into two sites) on Crissy Field near the project area. One of these sites, CA-SFR-129, is directly adjacent to the north of the project area. The other, CA-SFR-6/26, is approximately a half mile to the west. These prehistoric archaeological sites are buried deposits representative of seasonal collecting activities along the margins of the San Francisco Bay and its estuary. These sites contain rich deposits of animal bone and shell and may contain archaeological features including house pits and floors, activity areas associated with cooking or processing, and other artifact concentrations. Prehistoric archaeological sites have also been known to contain burials; a single human burial was previously uncovered at CA-SFR-6/26. Consequently, previously unknown archaeological sites could be present within the project area and would likely be similar in character to the previously discovered sites on Crissy Field.

Protection of archaeological resources is achieved by adhering to procedures outlined in the Trust's Programmatic Agreement (PTPA) (Trust 2014a). All projects are handled in accordance with an Archaeological Management Assessment and Monitoring Plan (AMA/MP) and several levels of archaeological review and oversight are built into project design and implementation.

Would the relocated Sports Basement affect any known or previously identified archaeological properties?

While Crissy Field is predicted to be sensitive for buried prehistoric sites, no known historic or prehistoric sites are located within the project area. The original construction of Buildings 1182-1188, along with associated ground work for infrastructure, may have already

disturbed buried archaeological sites, affecting their physical integrity. The Presidio Elevation Change Model (Trust 2008a) suggests that up to 10 feet of historic-era fill has been deposited over native ground surface at the western elevations of Buildings 1184 and 1185 and up to five feet of fill exists at the south elevation of Building 1184. Elevation change in the remaining area is predicted to be minimal. Archaeological monitoring of adjacent improvements for the Presidio Parkway project has not revealed any buried subsurface archaeological remains outside of the previously identified adjacent archaeological site of CA-SFR-129. As such, the potential for encountering undiscovered historic or prehistoric sites in the project area is low.

Further, ground disturbance for the proposed rehabilitation to house the Sports Basement is minimal and would be restricted to small scale excavation for building upgrades. With the exception of the proposed new deck and ramps, most ground disturbance would be restricted to the existing building footprint, minimizing the possibility of encountering native soils with the potential for archaeological resources. The deck is located in an area of substantial historic fill, allowing it to be constructed without damage to buried prehistoric or historic archaeological sites.

Because of the residual possibility for ground-disturbing activities to impact potentially buried archaeological sites, archaeological oversight would be included in all phases of design and implementation. An AMA prepared for the project would ensure that any discoveries are handled in accordance with all stipulations of the PTPA. If the proposed action requires more extensive ground disturbance, archaeological testing prior to construction may be necessary. Archaeological monitoring of ground disturbance would further ensure that any archaeological resources present in the project area are identified and treated appropriately.

Cultural and Education Center/Offices

Effects to archaeological properties from the PTMP alternative would be similar to those identified for the proposed action. Ground disturbance for landscape, utilities, and building upgrades are similar enough that the potential for impacts is equivalent. Archaeological resources would be protected through the same process as summarized above and outlined in the PTPA.

Conclusion

Neither the proposed action nor the PTMP alternative would likely affect any known or previously identified archaeological properties in the project area. Archaeological resources would be protected by adhering to procedures outlined in the PTPA. An AMA would be prepared for the project to ensure that any discoveries are handled in accordance with all stipulations of the PTPA.

VISUAL RESOURCES

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 area.

The warehouse buildings form a distinct cluster that marks the Mason Street entrance. The buildings are oriented toward Mason Street and provide a consistent built edge along the south side of the street. The buildings are relatively modest in scale but an important element of the streetscape along Mason Street, as they create a distinctive rhythm along the street. The warehouses also offer views across Mason Street of Crissy Field's easternmost undulating grassy dunes, hedgerow of cypress trees and the East Beach parking lot beyond.

Would the relocated Sports Basement block an existing view, be visually intrusive or contribute to a degraded visual condition?

The proposed action would include the rehabilitation and conversion of the existing warehouses into a sporting goods store. The new use would require minimal change to the

defining visual characteristics of the buildings and the site, including the overall form and massing, board-and-batten and stucco siding, and raised access platforms/loading docks. The modifications to the building exterior would enhance the existing visual character of the Mason Street streetscape and would have a positive effect on the visual integrity of the project area. Exterior alterations, which would include connecting the buildings, extending the existing docks, and installing ridge skylights would not detract from the overall visual character of the site. The design of the east-west connectors would be simple and transparent, allowing the buildings to read as separate structures and preserve the spatial relationships among the buildings. The extension of the loading dock would reinforce the dock as a prominent visual feature of the buildings, and preserve the visual relationship between the buildings and the landscape. The dock extensions would not disrupt any existing view. No change to the existing buildings' height would occur, and the ridge skylights would not substantially alter the roof profile or overall form of the buildings or be visible from the street. The new onsite parking would be as visually unobtrusive as possible. The appearance and placement of signs would be consistent with the Trust's Guidelines for Non Residential Exterior Tenant Signs (Trust 2013b) to prevent visual discord and clutter.

Cultural and Education Center/Offices

Under this alternative, there would be no significant visual changes from existing conditions. The warehouses would be rehabilitated, with most alterations not visible outside the buildings. New construction would be limited to the covered breezeways between the buildings. Therefore, there would be no potential for building design or modifications to be incompatible with the existing visual character of Crissy Field.

Conclusion

Neither the proposed action nor the PTMP alternative would substantially alter scenic views or degrade current visual conditions. To the contrary, building rehabilitation conducted in

accordance with PTMP principles and guidelines would have a positive visual effect on the buildings, which would enhance the existing visual character along Mason Street.

LIGHT AND GLARE

Natural lightscape is used in this discussion to describe resources and values that exist in the absence of human-caused light at night.

The starry night sky and natural darkness are important components of Crissy Field and the Presidio. The Presidio 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.

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 Lighting¹⁴ 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 project is especially important to prevent the disturbance of ecological processes and degradation of scenic values of the future Quartermaster Reach located directly west of the proposed parking lot and the nearby Crissy Marsh.

¹⁴ In preparation.

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).

Would the relocated Sports Basement create light pollution?

The proposed action would minimize light pollution. Code-required lights would be installed where egress, accessibility, and personal safety are principal concerns. These 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). 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 BUG (Backlight, Uplight and Glare) ratings and photometric analyses, to avoid light trespass into adjacent natural areas.

Cultural and Education Center/Offices

The lighting for the parking lot and along the south side of Mason Street would be similar to Sports Basement. Careful selection of fixtures and photometric analysis would ensure light trespass into natural areas is avoided.

Conclusion

New lighting associated with the proposed action or PTMP alternative 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 effects of light pollution, including those on the Presidio's night sky or adjacent natural areas.

WATER RESOURCES

The project and surrounding areas, including the warehouse buildings and proposed parking lot, Mason Street to the north, Girard Road to the south, the Presidio boundary to the east

and the future Quartermaster Reach to the west, are currently and have historically been covered with impervious surfaces. Currently, storm water runoff generated from these areas discharges to the San Francisco Bay through Outfall A, which runs along the eastern boundary of the Presidio from the south side of the project area north to the San Francisco Bay. The existing site storm drain system is not well developed and is currently in a state of disrepair. However, the Presidio Parkway and Quartermaster Reach projects will substantially change the storm water drainage system serving the project and surrounding areas and remove large paved areas around the site.

The Presidio Parkway project will construct Girard Road that bounds the southern side of the project area. Girard Road includes a new storm drain trunk line that will convey storm water generated from the eastern portions of the Presidio Parkway to Outfall A. The site storm drain systems serving the proposed parking lot and the triangle lot south of Girard would connect into the Girard trunk system. Designs for the Presidio Parkway include an analysis detailing stormwater treatment requirements for the overall project, including the parking lot adjacent to Buildings 1183-1185 (WRECO 2013). The current plan, which is expected to meet applicable water quality criteria and be approved by the San Francisco Bay Regional Water Quality Control Board, provides storm water treatment measures for the overall Presidio Parkway alignment. Treatment measures will include using bioretention systems, swales and ponding to filter and remove toxins from roadway storm water, particularly first flush.

The Quartermaster Reach project located just west of the project area will “daylight” an 850-foot section of storm drain line in order to restore wetland habitat and create a hydrologic connection to Crissy Marsh. Daylighting the creek will provide the opportunity to improve runoff water quality, as flow rates will be attenuated and exposed to filtration by riparian and wetland plants. Filtration will be further enhanced with the inclusion of vegetated swales, located at the outfall of all storm drains feeding the Quartermaster Reach (Trust 2010).

Would the relocated Sports Basement inhibit surface water drainage, alter the landscape topography, or lead to increased runoff or erosion?

The proposed action would lead to minor changes to the project area resulting in impacts on water resources ranging from negligible to beneficial. The changes include:

- converting the paved areas along the eastern and southern sides of the warehouses to landscaped areas, which would reduce the amount of runoff generated from the area; and
- routing rain water leaders from the buildings to the landscaped areas to the extent practicable to promote infiltration; and constructing a curb and gutter along Mason Street on the northern boundary of the project area, which would include new catch basins and storm drain pipes to route runoff from Mason Street to Outfall A.

No storm water generated from the project area would be discharged to the future Quartermaster Reach.

During construction, a Storm Water Pollution Prevention Plan (SWPPP) would be developed and implemented to control sediment in construction site runoff. The SWPPP would require construction and implementation of BMPs (e.g., silt fencing, jute netting and wattles) to reduce pollutants in storm water discharges from the construction site.

Cultural and Education Center/Offices

Impacts to water resources from the PTMP alternative would be similar to those described for the proposed action. The parking lot constructed by the Presidio Parkway project, which is the most salient hydrologic feature, would be the same for both the proposed action and the PTMP alternative. The development of the balance of the project area would likely be very similar.

Conclusion

Neither the proposed action nor the PTMP alternative would likely affect surface drainage, increase runoff or erosion. Minor changes to the site topography, such as reducing the amount of pervious surface, would reduce the overall runoff generated from the site. A storm drain system would be installed to prevent flooding and route storm water to Outfall A. The parking lot constructed by the Presidio Parkway project would include any required storm water treatment measures. No project-generated storm water would be discharged to Quartermaster Reach.

SEA LEVEL RISE

The CEQ advises Federal agencies that they should adapt their actions to climate change impacts throughout the NEPA process and to address the issue in their NEPA environmental documents (CEQ 2014).

Global sea levels have, primarily, had a slow but steady rise in previous centuries. While there are uncertainties associated with long-term projections from global and regional climate change models, sea level rise is now accelerating and projected for the San Francisco Bay to be 20 to 55 inches by 2100 (CALFED 2007). The USGS predicts it could be as high as 80 inches by 2100 (Knowles 2010). Sea level rise can affect the integrity of a structure by exposing it to a greater risk of floods or storm surges. Section 1612.3 of the Trust-adopted International Building Code (IBC 2009) requires that the Trust utilize a flood hazard map which includes "areas of special flood hazard as identified by FEMA..." The flood insurance rate map (FIRM) issued by FEMA (2007)¹⁵ shows the nearby Crissy Marsh and immediately adjoining area located within a special flood hazard area.

¹⁵ <http://sfgsa.org/Modules/ShowImage.aspx?imageid=2670>

Would the relocated Sports Basement require design changes due to the projected increase in the rate of sea level rise?

Some impact on the proposed action from sea level rise may be likely within the next century, but to an extent that appears to be negligible based on present projections. The undersides of the structures are 12 to 24 inches above grade and the project is 12 to 14 feet above the current sea level. Prior to occupancy, the Trust would review the design of the proposed action to ensure it meets International Building Code performance objectives for construction and modifications of buildings within flood hazard areas (the IBC also references ASCE 24 which provides code directed performance measures and standards for structural design and construction). Ongoing assessment of climate change data and research updates is warranted. The Trust would modify monitoring strategies so as to use more reliable data and incorporate best practices within a reasonable time frame. With monitoring, there would be ample notice of the need to adapt the proposed action to changes in the environment well after the NEPA process is completed. Given the length of time and uncertainties involved in present sea level projections, no additional measures to reduce the projected effects of climate change on the proposed action are necessary at this time.

Cultural and Education Center/Offices

Similar to the proposed action, conformance with the IBC for buildings within flood hazard areas would ensure that the PTMP alternative is adapted to anticipated climate change impacts.

Conclusion

The Trust would incorporate consideration of the impact of sea level rise on the proposed action or PTMP alternative during building design review. No additional adaptations to

anticipated sea level changes are warranted. The Trust would monitor climate change issues and incorporate best practices as they evolve to reflect the scientific information available.

HAZARDOUS SUBSTANCES

The characterization of contaminated sites, exposure pathways, and potential health risks associated with reuse and redevelopment at the Presidio are addressed under regulatory controls separate from the NEPA process. Detailed information about hazardous waste contamination at the Presidio and the Trust's overall cleanup activities can be obtained by contacting the Trust's Environmental Remediation Department at 415/561-2720.

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.

Would the relocated Sports Basement involve handling and/or storage of hazardous substances?

The following hazardous materials have been known to be within and/or adjacent to the project area:

Lead-based Paint: The Trust completed lead-based paint (LBP) in soil activities at the warehouses and submitted a request for no further action with implementation of land use controls and a land use notification to DTSC on March 24, 2014 (Trust 2014b). DTSC approved the request in a letter dated April 21, 2014 (DTSC 2014a). The land use control (LUC) applies to limited areas at Buildings 1183, 1186 and 1188 and the land use notification (LUN) applies to a section of Building 1187. In addition to the existing formal LUCs and LUN, a Trust voluntary LUN has been applied to perimeter soils around Buildings 1182-1188 where concentrations of lead are present above the state screening level of 80mg/kg. This lower number was established after the Presidio-wide LBP in Soil Investigation Work Plan was approved by the DTSC in October 2008 (Trust 2008b). Disturbance of soils in the LUC and LUN areas would be coordinated with the Trust's Remediation Department to ensure

that residual lead contamination in soil does not pose a risk to future building tenants and visitors.

Petroleum Releases: A 582-gallon above-ground storage tank containing propane associated with Building 1185 was removed by the U.S. Army in October 1996 and was closed by the Water Board in October 2008 (Water Board 2008). There are no other known tanks or fuel delivery system (FDS) lines associated with the warehouses.

Waste Releases: Buildings 1185-1187 were also considered Miscellaneous Sites that required assessment for known or potential contamination. A description of the sites and a request for no further action was submitted to the DTSC on May 2, 2014 (Trust 2014c). The DTSC approved the request in a letter dated May 15, 2014 (DTSC 2014b).

Cultural and Education Center/Offices

Similar to the proposed action, soil surrounding the warehouses that may have been affected by LBP would be addressed, and soil investigation and management activities for LBP in soil in the project area would be implemented to protect human health and the environment. The potential for waste releases would also be addressed, and DTSC approval of a no further action recommendation would signify that its concerns at the project site have been addressed.

Conclusion

Hazardous materials have minimal potential to affect either the proposed action or the PTMP alternative based on the extent of contamination defined in the investigations and the status of remedial actions. Because the risk of human exposure is low and precautionary measures would be implemented as necessary, potential impacts to human health, safety and the environment due to hazardous substances would not be significant.

CUMULATIVE IMPACTS

"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: visitor use and experience, transportation, parking, historic resources, archaeological resources, visual resources, light and glare, water resources, sea level rise and hazardous substances.

The Trust found the following actions relevant to the cumulative impact analysis because they have a bearing on the effects of the proposed action and the PTMP alternative:

- Potential long term use of Building 1199, the current Crissy Field Center at East Beach
- Future use of the former Commissary building as a cultural institution
- Future use of Buildings 935 and 937 as an aquatic and fitness center
- Future long-term use of the Palace of Fine Arts building¹⁶
- Completion of the Presidio Parkway
- Creation of 13-acres of new parkland above the Presidio Parkway roadway tunnels connecting the Main Post and Crissy Field as part of the New Presidio Parkway project

Would the relocated Sports Basement contribute to cumulative impacts?

Visitor Use and Experience

Special events and projects with extensive programming attracting new visitors to Crissy Field (such as a cultural institution at the Commissary site, new parkland above the Presidio Parkway roadway tunnels and a permanent Crissy Field Center at East Beach) could cause visitation on peak days to exceed levels for which Crissy Field was planned to accommodate, thereby affecting visitor safety, uses, satisfaction or understanding. However, even on peak days, conditions are expected to be busy but remain comfortable to manageably crowded, with only slightly more crowds than currently experienced. Management actions and protection measures would be in place to reduce visitor density and ensure that safe conditions are maintained. With mitigation measures implemented to reduce effects to

¹⁶ Uses being considered include museum-type use, educational use, sports facility, performing arts, exhibition space, and event venue, among others.

visitor use as much as feasible, the cumulative impacts on visitor use and experience at Crissy Field would be minimized. Nevertheless, some existing park visitors, such as bicyclists, joggers and dog walkers, may avoid this section of the park or experience a reduction in visitor satisfaction. Long-term use of the Palace of Fine Arts building would offer public access to at least a portion of the building, enhancing the visitor experience in the larger community.

Transportation

The Main Post Update EIS was based on the best available information for uses in the Crissy Field district. The analysis assumed Sports Basement remained in Building 610, and assumed the climbing gym, swim school and trampoline gym in the West Crissy area. Sports Basement’s occupancy of Buildings 1182-1188 combined with a cultural institution at the Commissary site, future warehouse use in Building 643, recent leasing activities in Crissy Field and Cavalry Stables, an aquatic and fitness center in Buildings 935 and 937, and long term use of the Crissy Field Center at East Beach would result in minor changes in the number of trips generated by the district when compared to what was analyzed in the Main Post Update EIS. The table below summarizes the cumulative number of PM peak hour vehicle trips generated by uses in Crissy Field (Area B). These minor changes in vehicle trips generated by uses in the Crissy Field (Area B) district would not significantly affect the operation of nearby intersections.

PM Peak Hour Vehicle Trips Generated in Crissy Field (Area B) district

	PTMP EIS	MPU EIS	Cumulative
PM Peak Hour Vehicle Trips	1,078	1,201	1,151

Assuming the future use of the Palace of Fine Arts would generate traffic comparable to the Exploratorium, the transportation impacts are addressed in the cumulative traffic analysis of the Main Post Update. Any future use being considered would include strategies to mitigate

traffic and parking impacts. The completion of the Presidio Parkway project will directly connect Marina Boulevard with the Main Post and Letterman districts via Girard Road, and this connection is expected to result in a slight reduction in traffic volume through the Marina Gate.

Implementation of the Trust's Transportation Demand Management (TDM) Program, including parking fees and PresidiGo shuttle service would encourage the use of alternative modes such as transit, walking and cycling and carpooling, and minimize the impacts of traffic generated by uses throughout the Presidio.

Parking

Sufficient parking would be available in the lot adjacent to Buildings 1183-1185 to support Sports Basement customers. Due to seasonal and weekly variation in park visitation, parking demand generated by visitors to Crissy Field (Areas A and B) is expected to exceed parking supply in some areas. On peak weekend days, visitors who choose to drive would have difficulty parking. The provision of park-wide transportation demand management 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 in Area B on the area of the Presidio outside the Trust's jurisdiction (Area A).

Historic Resources

Reconstruction of the Presidio Parkway has resulted in an adverse impact to the Presidio NHL district and cultural landscape due to the removal of contributing buildings and structures. There has been a direct adverse effect on Doyle Drive itself through the removal of the facility and replacement with new structures. Three buildings that contribute to the Presidio NHL district (Buildings 204, 230 and 670) have been removed, along with the lower

half of contributing Building 201. The Presidio NHL district has also been adversely affected by the project's altering the alignment of 12 contributing roads. In addition, the Presidio Parkway has had an adverse effect on the historic bluff that separates the upper and lower posts of the Presidio. Both the loss of portions of the bluff and the introduction of a non-historic topographic feature have adversely affected the Presidio NHL district. Measures to address these adverse impacts have been incorporated into a Programmatic Agreement (PA), included in Appendix I of the Doyle Drive EIS/R (SFCTA 2008).

The Sports Basement project would adversely affect the Mason Street warehouses (contributing Buildings 1182, 1183, 1184, 1185, 1186, 1187 and 1188) due to the amount of historic fabric removal, and reconfiguration of the seven-building warehouse complex to accommodate a single retail tenant. Rehabilitation and occupancy of the buildings, including full structural, building systems and accessibility upgrades, would have a beneficial effect on the Trust's efforts to adaptively reuse and safely invite the public into its historic buildings. While the adverse effect associated with the project would incrementally contribute to the overall cumulative effect to the NHL district, the localized nature of the effects does not constitute a significant impact.

The remaining cumulative actions are not likely to contribute to the adverse effect caused by the Presidio Parkway project. Rather, they would result in a beneficial effect on Crissy Field and the Presidio NHL district as a whole as they would contribute to the compatible transformation of the shoreline area of the Presidio NHL district, along with the past rehabilitation of the Crissy Airfield, Crissy Marsh and East Beach areas, and the future restoration of Quartermaster Reach. The contribution of the proposed action to cumulative actions, however, is not significant due to the low level of integrity associated with historic resources surrounding the project area. The proposed action would be consistent with PTMP planning principles and design guidelines that govern the appropriate treatment of the Crissy Field (Area B) district, which also constitutes the area of potential effect (APE). Finally, future long-term use of the Palace of Fine Arts building would preserve its architectural

significance and celebrate its history, which would have a beneficial effect on regional efforts to preserve historic resources and their settings.

Archaeological Resources

Ground-disturbing activities associated with cumulative actions, including completion of the Presidio Parkway and future use of the Commissary, could adversely affect archaeological sites. The cumulative actions 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 potential or known 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 catalogued, 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.

Visual Resources

The cumulative actions would provide a visual backdrop to the restored Crissy Airfield and Marsh. The landscaped bluff over the roadway that would be created as part of the New Presidio Parkway project would provide a magnificent new park setting that would offer unimpeded views of the bay, bridge and beyond. Modifications associated with the project would restore visual connections between areas that have been separated by Doyle Drive's low-viaduct (i.e., the Main Post and Crissy Field). Changes and localized improvements in visual quality would be beneficial. The Mid-Crissy Area Design Guidelines would provide direction for the project, including building reuse, parking, circulation, and landscape upgrades and guide the redevelopment of the area in a manner that protects its visual resources (one of the chief objectives of the guidelines is to preserve and enhance views).

With regard to future use of the former Commissary building, adherence to the PTMP and Mid-Crissy Area Design Guidelines would preserve and enhance views and be sympathetic with Crissy Field's dramatic visual setting by:

- ensuring that any new construction or building additions are sensitive to the prevailing architectural treatment, scale, massing, and orientation of existing buildings;
- keeping the height of new construction below the bluff profile; and
- orienting structures to and maintaining a built setback from Mason Street.

Placing portions of the Doyle Drive roadway at or below ground level and eliminating the visual and physical barrier created by the elevated structure have restored visual connections between areas of the Presidio that have been previously separated. Realignment of streets, removal of several buildings, and redevelopment of portions of the affected areas, such as Quartermaster Reach, would improve visual quality. However, an adverse visual impact would continue during construction of the Presidio Parkway due to the presence of substantial amounts of equipment and disruption to the landscape.

Finally, potential long-term use of the current Crissy Field Center at East Beach would constitute a permanent structure in an area previously dominated by open space. However, based on the design, materials, location, and screening of the facility, it is not expected to create an after-the-fact adverse visual impact.

Light and Glare

The cumulative actions 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 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 Presidio Parkway would minimize light pollution by use of highly directional roadway lighting, restricting lighting in areas where it could impact biodiversity, utilizing full cutoff fixtures to direct light and reduce light trespass, using lowest acceptable levels of lighting, providing light/glare shields, and screening oncoming headlights (ARUP PB Joint Venture et.al. 2007). The Crissy Field Center at East Beach would be guided by NPS Management Policies¹⁷ to ensure the light emanating from the facility is minimized (NPS 2006).

Water Resources

Cumulative actions would have a positive impact on storm drainage at the Presidio by reducing the amount of impervious surfaces, providing storm water treatment measures, and restoring natural habitats. The Presidio Parkway would reduce total runoff volume and pollutant loading, since approximately 25 percent of the roadway would be in tunnel segments, and therefore, not subject to storm water runoff. Treatment measures would treat storm water generated from approximately 34.5 acres of highway area, local roadways and parking lots, providing a net benefit to storm water runoff quality and the quality of receiving waters.

The New Presidio Parkway project would create absorbent landscapes and utilize onsite stormwater management. Irrigated turf would be limited to programmatic spaces, scaled to particular types of experience and activity. The northernmost area below the embankment could serve as a flooding buffer for the relocated Crissy Field Center.

Future use of the Commissary building would incorporate on-site storm water detention to minimize runoff and maximize groundwater recharge, plant predominantly native plant species in new landscaping, and restore native habitat, as appropriate. The Quartermaster

¹⁷ Lightscape Management 4.9.

Reach would convert more than 8.5 acres of currently impervious surface into native habitat and other landscaped areas. Permeable pavement, bioswales or other on-site storm water management strategies would be explored to reduce runoff from parking lots. The project would contribute incrementally to these benefits.

Sea Level Rise

Climate change effects including increases in storm intensities and sea levels would have direct implications for all cumulative actions. Environmental documents prepared for the cumulative actions, land use management plans and guidance of the affected agencies (Trust, NPS, City and County of San Francisco, San Francisco County Transportation Authority) describe approaches that each agency would take to respond to the effects. The agencies would need to coordinate with each other in developing tools and strategies to help identify and manage climate change impacts, and adapt accordingly to changing conditions.

Hazardous Substances

The proposed action, 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;

Key remediation projects that have been completed to date can be found at <http://www.presidio.gov/about/Pages/remediation-to-restoration-project-success.aspx>.

- 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 to levels that are protective of human health and the environment.

Conclusion

The cumulative impact analysis confirms that the effects of the proposed action do not reach a point of significant environmental impacts. There would be no change in the level of activity occurring at the relocated sporting goods store as compared to its current location, and no increase in the demand for services or utilities. There would be no increase in personnel or customers or associated traffic. While not a significant impact, there would be a parking shortfall during peak weekends that could be accommodated by readily available TDM measures identified in the PTMP and GMPA that would result in more efficient use of the parking spaces provided. Thus, the incremental impacts associated with the Sports Basement, or the Cultural and Education Center/Offices, are not expected to be significant. In all instances, the incremental contribution of the relocated sporting goods store to the cumulative impact on Crissy Field (Areas A and B) or the Presidio at large would be neutral, essentially being a shift in location of existing impacts, or beneficial, as discussed in the cumulative impact analysis.

AGENCY CONSULTATION AND PUBLIC INVOLVEMENT

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) consult with agencies to identify issues and seek their advice and expertise, and 2) to encourage the participation of the public prior to preparation of the EA. Responses to scoping comments are also provided.

NHPA REVIEW 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 NHL district. As a result of the consultation for the PTMP, the Trust entered into a Programmatic Agreement (PTPA) with the SHPO, the ACHP, the NPS (signatory parties), and the National Trust for Historic Preservation and the Presidio Historical Association (concurring parties) that applies to the proposed undertaking. The PTPA provides a framework for reviewing different types of projects, and for consulting with other parties under certain circumstances.¹⁸

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 Mason Street warehouses project according to the PTPA on July 12, 2013, which included delivery of a consultation package containing a summary of project information, a proposed area of potential effect (APE) and a request for early input. The Trust submitted the EA to all PTPA parties as a supplemental consultation package along with a summary of comments gathered during public scoping, a revised APE, a Historic Resources Evaluation Report (HRE), and a request for a consultation meeting on October 11, 2013. The Trust held a consultation meeting with the signatory parties on November 25, 2013 to discuss the materials provided for review and comment.

Based on comments received during that consultation meeting and in response to subsequent submittals, the Trust worked with the project proponent to revise the design. A consultation meeting was held on December 16, 2014 at the SHPO's office in Sacramento to present and discuss the results of these revisions. The parties reached agreement on the

¹⁸ Consultation for the project was begun under the 2002 PTPA, which was superseded by the 2014 PTPA.

approach to several elements of the design, including the elimination of a skylight and western deck, treatment of the new storefront entrances, character of the east/west connecting structures, the tenant sign package, and the treatment of the openings on the western elevations of Buildings 1184 and 1185.

Following circulation of the meeting minutes from the December 16, 2014 discussion, the NPS informed the Trust that it was supportive of the project but would not concur with a determination of “no adverse effect” due to the amount of historic fabric removed to create the north/south connections, and the alteration of the character of the seven separate buildings to serve a single retail tenant. Accordingly, in order to conclude the consultation, the Trust revised its initial, preliminary finding of “no adverse effect” to one of “adverse effect” to the Mason Street warehouses.

The Trust informed the ACHP of this determination, consulted with the NPS and SHPO on the development of a Memorandum of Agreement (MOA) to resolve the adverse effects, and invited the public to participate in the process (no responses were received). The parties identified minimization and mitigation measures including building documentation, site interpretation, operation of certain elements of the new design, and progress set review of the seismic scheme. The Trust signed the MOA on May 18, 2015, and then submitted the fully executed document with signatures from NPS and SHPO to the ACHP on June 9, 2015.

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 NHPA.

Advisory Council on Historic Preservation

The ACHP is an independent federal agency that promotes the preservation, enhancement, and productive use of the nation's historic resources, and advises the President and Congress on national historic preservation policy. Among other responsibilities, the ACHP administers the NHPA's Section 106 review process and works with federal agencies to help improve how they consider historic preservation values in their programs.¹⁹ The ACHP is a signatory party to the PTPA and principally comments on process and procedures relative to that document and the NHPA, and resolves objections among parties to the PTPA during consultation. The ACHP submitted a letter on the scoping package commenting on the appropriate type of review under the Trust's PTPA, and thanking the Trust for ACHP notification (ACHP 2013). On April 10, 2015 the Trust notified the ACHP of its revised finding of "adverse effect" for the undertaking, and provided information regarding the consultation pursuant to 36 CFR 800.11(e). In an April 27 letter, the ACHP acknowledged receipt of the package and informed the Trust that their participation in the consultation to resolve adverse effects was not needed. Pursuant to 36 CFR 800.6(b)(1)(iv), the Trust submitted the final, executed MOA to the ACHP on June 9, 2015.

National Park Service

The Presidio Trust Act, as amended, describes the statutory framework for the relationship between the Trust and the NPS. The NPS manages Area A of the Presidio, including Crissy Field north of Mason Street and across from the project area. The NPS is also a signatory party to the PTPA. The Trust provided courtesy notice to the NPS of its intent to announce/kick off the Sports Basement project and invited NPS staff to attend the public scoping meeting on July 22, 2013 (Trust 2013b). To facilitate early coordination with the NPS in the Trust's NEPA and NHPA processes, Trust staff presented the Sports Basement project at the July 24, 2013 5X/Project

¹⁹ See "About the ACHP" at <http://www.achp.gov/aboutachp.html>.

Review Meeting (NPS 2013a). At the meeting, NPS staff took the opportunity to identify preliminary scoping concerns and make recommendations, which were incorporated into a letter to the Trust (NPS 2013b) (see Attachment 3 for a copy of the letter and the section below for responses). The Trust continued consultation with the NPS based on comments received in a November 25, 2013 letter (NPS 2013c), and in consultation meetings on November 25, 2013 and December 16, 2014.

California State Historic Preservation Officer

Like the NPS, the SHPO is a signatory party to the PTPA, and thus received a consultation package upon the opening of public scoping/initiation of consultation for the project. The SHPO will participate in the forthcoming consultation meeting and will be asked to comment on, and ultimately concur with, the finding of “no adverse effect.” The SHPO submitted a comment letter on the scoping package on September 10, 2013 offering several comments, and thanking the Trust for seeking SHPO comments and considering historic properties as part of its project planning (SHPO 2013) (see Attachment 3 for a copy of the letter and the section below for responses to comments). The SHPO provided additional comments on the project in a January 6, 2014 letter (SHPO 2014) and in the above-mentioned consultation meetings. The SHPO confirmed execution of the MOA and conclusion of consultation with her office in a letter accompanying the signed document on June 9, 2015 (SHPO 2015).

City and County of San Francisco

The Trust requested the Sustainable Streets Division of the San Francisco Municipal Transportation Agency (SFMTA) to increase the amount of green time for eastbound Mason Street at the intersection of Marina Boulevard, Mason Street and Lyon Street. SFMTA shared the Trust’s concern for traffic congestion. Based on its investigation, SFMTA indicated it would provide substantially more green time for eastbound Mason Street during the weekends to accommodate the increasing number of visitors to the Presidio (note: the

change was made recently). SFMTA thanked the Trust for bringing its concerns and observations to SFMTA's attention (SFMTA 2013).

PUBLIC PARTICIPATION

The Trust announced the beginning of public scoping for the Sports Basement EA through a notice on its website at www.presidio.gov on July 12, 2013, and the July 12, 2013 issue of the Presidio e-news, the Trust's monthly electronic update of news and events in the park that is sent to approximately 9,000 subscribers. The notice invited the public to provide comments on the scope, the range of alternatives, and the issues that should be examined in the EA. The notice referred interested parties seeking more information to the Trust's Scoping Announcement (2013c), which briefly described the proposed action and the Trust's scoping process, and identified a Trust staff contact. The Trust also gave notice to the local supervisor representing the adjacent neighborhood in the City and County of San Francisco, the city's planning department and mayor's office, and other organizations for which such notice is routinely provided. As part of the scoping process, the Trust also invited the public to join Trust and Sports Basement staff at an informational open house held on July 22, 2013 at the Mason Street warehouses (Building 1188). Sixty-four individuals attended the open house to ask questions, provide suggestions on the scope of the EA, and/or to support the project.

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

By the close or shortly after the public scoping period for the project that ended August 12, 2013, the Trust received three letters, 29 comment cards and 39 emails from three public agencies, 15 organizations, and 38 interested individuals (see table). Of the 71 letters, comment cards and emails received, 90 percent (64 letters) were nonsubstantive, generally expressing support for the project, and therefore had no influence on the preparation of the EA.

Public Agencies, Organizations, and Individuals Submitting Scoping Comments

Public Agencies

United States Department of the Interior,
National Park Service, Golden Gate National
Recreation Area, Division of Planning

Advisory Council on Historic Preservation
State Historic Preservation Officer

Organizations

AIDS/LifeCycle
Crissy Field Dog Group (3)
Golden Gate Triathlon Club
Green Apple Books (2)
Half Full Running Club
Project Sport (2)
Presidio Historical Association
RhodyCo Productions

San Francisco Bicycle Coalition
San Francisco Locally Owned Merchants
Association
San Francisco Outrigger Canoe Club (6)
San Francisco Road Runners Club
Team in Training (4)
Water World Swim (4)
Wheel Kids Bicycle Club, Inc.

Individuals

Anonymous
Bret Ashworth
Richard Beatty
Allison Berger
Paul Callary
Courtney Clarkson
Poppy Dere
Karen Erickson
Steve Fillipow
Gregory Fleming
Charlie Graham
Ron Hirsch
Morgan Hunt
Deb Jaffe
Jenny P. Jerez, Esq.
George Kelly
Bhavani Kludt
Roy Leggitt
Lois Markovich

Sally Maske
Bob Mateo
Romain Miralles
Paul Mohme
Beth Mooney
Kiyomi Noguchi
Mark Pepper
Roger Pettey
Arno Rosenfeld
Alxandra Siliezar
Amy Sonstein
Joanne Stack
Joe Stefani
Chip Stewart
Jennifer Stott
Liz Tausend
Brian Thompson
Tracy Villanueva
Nat Wyatt

RESPONSES TO SCOPING COMMENTS

A summary of the concerns raised during scoping with responses to the issues raised are as follows:

Alternatives

Comment: Analyze warehouse use of the Mason Street warehouses, as they were used for many years to store the Exploratorium's equipment and subsequently had a much lower impact in the area (Crissy Field Dog Group).

Response: Warehouse use is not being considered because it does not provide the financial means to rehabilitate the buildings and does not contribute to the Trust's larger vision for Crissy Field as a visitor-oriented district as identified in the PTMP. For these and other reasons provided in the discussion of alternatives considered but rejected in the Description of Proposed Action and Alternatives section, it was determined that warehouse use is not a viable alternative.

Comment: Identify other locations within the Presidio that would be better suited for the proposed use given the car, pedestrian and bicycle activity it generates and the already extremely busy area, especially on the weekends (Crissy Field Dog Group).

Response: Existing buildings in the Presidio were reviewed for availability of space, appropriate location, and level of improvements needed for Sports Basement. The few identified buildings that provide approximately 90,000 square feet of space are preferred in the PTMP for other uses, are otherwise leased and/or occupied, would require extensive renovation resulting in an adverse effect to the historic properties, and/or would generate more traffic than the proposed location. Furthermore, remaining near or on Crissy Field for ready access to resources was an important criterion to Sports Basement. For these and other reasons provided in the discussion of alternatives considered but rejected in the Description of Proposed Action and Alternatives

section, it was determined that alternative locations for Sports Basement are not viable alternatives, and are not being considered. The commenter is referred to the Environmental Consequences section for the analysis of Sports Basements impact on transportation and visitor use and experience.

Land Use and Visitor Experience

Comment: Note that preferred uses for Crissy Field (Area B) described in the PTMP include cultural facilities and educational programs (NPS).

Response: The Trust has pursued cultural and educational uses at Crissy Field (Area B) when seeking tenants for many of the district's buildings. The preferred uses set forth in the PTMP are long-term goals, and the PTMP also provides sufficient flexibility to allow the Trust to consider tenants not offering preferred uses, but nonetheless bring value to the park by rehabilitating historic buildings, generating revenue and contributing to the park's vitality, as is the case with Sports Basement.

Comment: Describe the proposed programming that would make an otherwise strictly retail use compatible for this district and location (NPS).

Response: Sports Basement promotes healthy lifestyles and enjoyment of the outdoors by offering free fitness classes, facilitating group workouts, and hosting educational and cultural events. The store raises money for non-profit groups and shares its resources in the form of cash and in-kind donations, donated staff hours, free use of store space for community groups, and training clinics on topics relating to sports and the outdoors. The store also offers low-cost bike and gear rentals to make it possible for visitors and those new to the outdoors to tour the Presidio, bike across the Golden Gate Bridge, or try a new sport without making an expensive purchase. The channels through which the retail store extends the opportunity for visitors and the community to engage with the park and enjoy its resources are provided in Attachment 2.

Comment: Identify any changes in building use square footage allocations as a result of the proposed action in combination with other leasing decisions of West Crissy and the resulting changes in impacts. The concern is whether an increase in retail and recreational use could result, individually or cumulatively, in parking and roadway congestion that was not anticipated in the PTMP (NPS).

Response: The PTMP evaluated a total of 640,000 square feet for the Crissy Field (Area B) district.²⁰ In recent years square footage allotment has changed, several buildings in the western end of the district have been occupied by tenants, and Buildings 605 and 606 have been demolished. Planned future actions include the proposed action, planned industrial/warehouse use in Building 643, and a cultural institution at the Commissary site. The combination of these past and planned future actions in the Crissy Field (Area B) district would result in the square footage allocations evaluated in the EA.

Comment: Provide a comparative analysis between the existing use and occupancy and the proposed use and occupancy and its cumulative context, including the Palace of Fine Arts/former Exploratorium space potential future use (NPS).

Response: Buildings 1182-1188 are currently vacant, so a comparative analysis to existing conditions is not relevant. A comparison between the proposed (Sports Basement) and the PTMP uses for these buildings is provided in the EA. The cumulative traffic analysis for the Main Post Update (MPU) EIS considered land use changes throughout the Presidio, including Crissy Field. The seasonally adjusted traffic counts collected for the MPU EIS in January 2008 served as the basis for this analysis. Since the Commissary was occupied by Sports Basement and the Palace of Fine Arts was occupied by the Exploratorium at that time, these uses are considered in the MPU EIS cumulative traffic analysis. This EA considers the traffic impact of relocating Sports Basement from its current location in the middle of the district to Buildings 1182-1188 in the east end of the district. More detailed

²⁰ See PTMP EIS, Table 39, page 270.

analysis of the impact of future land use decisions (e.g., a cultural institution at the Commissary) will be conducted as part of the NEPA review process for those projects as information becomes available.

Comment: Disclose the specific improvements that would be made within the project area to “transform the area south of Mason Street into a friendly, welcoming space” as noted in the PTMP, particularly the changes that would be made at the already confusing and challenging Mason Street entrance into the Presidio (NPS).

Response: There are several planned improvements to the south side of Mason Street, some of which would be constructed as part of the Doyle Drive reconstruction project. The small parking area (4 spaces) immediately east of Building 1188 would be removed and replaced with landscaping. This expanded landscape area would allow the planned new sidewalk on the south side of Mason Street to be extended eastward to the Marina/Girard/Lyon intersection.

Comment: Consider creating crosswalks along Mason Street to allow for safe crossing between both sides of Mason Street for visitors (NPS).

Response: The Trust agrees that Sports Basement’s occupancy of Buildings 1182-1188 would create the need for a pedestrian crossing of Mason Street farther west from the current crossing near the Marina Gate, and agrees the location of the crossing should be carefully coordinated with the circulation improvements being considered at the East Beach area. The planned construction of a sidewalk along the south side of Mason Street in the vicinity of these buildings would allow flexibility in locating a safe pedestrian crossing to coordinate with planned changes on the north side of Mason Street.

Comment: Find alternative locations for outrigger canoe storage outside the project area as the use would further negatively impact East Beach. “‘Less is more’ is very appropriate

here” (Crissy Field Dog Group). If relocated to the project area, consider the safety of boat crossing on Mason Street and the compatibility of the use at East Beach (NPS).

Response: Canoe practicing and racing offers an appropriate, high-quality opportunity for users to enjoy the offshore waters at East Beach. East Beach provides easy access to the shoreline, with nearby parking and staging areas. The use is sustained without causing any unacceptable impacts on Crissy Field’s resources or values. The boats are currently stored at Sports Basement’s Commissary location but, due to insufficient storage space and the Mason Street crossing, would not be relocated to the Mason Street warehouses area. It is hoped that a more suitable storage space for the boats can be found elsewhere on Crissy Field (Areas A or B) subject to additional environmental review.

Transportation

Comment: Quantify and analyze changes to Mason Street, Marina Gate and Marina Boulevard traffic as a result of the proposed action and in regard to overall capacity of the roadway and nearby intersections, including bicycle and pedestrian safety (NPS, Crissy Field Dog Group). Keep in mind other established organizations that already affect this area, including the Crissy Field Center (Crissy Field Dog Group).

Response: The EA considers the estimated change in number of trips generated in the district due to relocation of Sports Basement farther east in the district. As described in the EA, Sports Basement is expected to generate a similar or slightly less volume of traffic in Buildings 1182-1188 as it does in its current location. The planned direct access from Girard Road and traffic signal timing changes would result in an improvement to the operation of the signalized intersection at the Marina Gate. The cumulative traffic analysis included in the MPU EIS was updated to consider current and immediately forthcoming land uses, including occupancy of buildings in west Crissy Field, Sports Basement’s occupancy of Buildings 1182-1188, and demolition of Buildings 605 and 606.

Comment: Analyze traffic flows both into and out of the future parking lots surrounding the warehouses, and the performance of these intersections (NPS).

Response: The preliminary design for the lot includes several improvements that would minimize traffic impacts on Mason Street. These changes are described in the discussion on transportation in the Environmental Consequences section.

Comment: Identify an alternative entrance/exit location for staff and customers to use since Mason Street is occasionally closed for special events (i.e. foot races) (NPS).

Response: Although limited to right turn in/right turn out maneuvers, the parking lot to the south and west of Buildings 1182-1188 would also be directly accessible from Girard Road. The impact of periodic closures of Mason Street for special events should be considered in the NEPA review process for the special events rather than this EA.

Parking

Comment: Make free parking available at the new parking lot, otherwise “I may give [shopping at Sports Basement] a second thought if I have to think about where I will be able to park” (Poppy Dere). “The entire concept of paid parking in a national park is wrong” (Anonymous).

Response: The Trust acknowledges that fee parking may discourage some customers from visiting Sports Basement. However, there is a need to balance the desire for free access with the adverse environmental impacts resulting from unrestricted automobiles. Parking fees encourage people to use alternative transportation modes, such as transit, bicycling, walking, or carpooling, to visit desired areas, thereby having a beneficial impact on the visitor experience for all. With or without relocation of Sports Basement, fee parking is expected to be implemented at the Commissary site following completion of the Presidio Parkway project.

Comment: Consider alternatives, including free parking or validated parking for Sports Basement to avoid or minimize impacts to East Beach visitor parking, which is currently a free lot (NPS and Crissy Field Dog Group).

Response: As described in the PTMP, parking fees are a key component of the Presidio Trust's transportation demand management (TDM) program. If parking at East Beach remains unregulated, the continued implementation of parking fees in Crissy Field (Area B), including the lot surrounding Buildings 1182-1188, could result in more drivers parking at East Beach. This impact was addressed and mitigation was identified as early as 2002 in the PTMP EIS:

TR-21 Presidio-Wide Parking Management. In order to reduce impacts of fee parking in Area B on parts of the Presidio outside the Trust's jurisdiction (Area A), the NPS is encouraged to implement parking regulations, time-limits and/or parking fees in potentially affected parking areas under its administration (notably, Crissy Field). The Trust would 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 impact parking for Crissy Field. This measure would apply to all alternatives except No Action.

The NPS' GMPA also recommends implementing parking fees:

Parking Fee Support of Transit Services. The Park Service would consider implementing parking fees in certain areas to further discourage automobile use and to offset the costs to provide transit services...

The Trust reiterates that the potential impact to the East Beach parking area as a result of the Trust's TDM program could be mitigated by implementing parking management strategies such as those recently implemented elsewhere in Area A.

Comment: Consider the demand for parking in the area resulting from other projects that are within or are expected to occur in the vicinity (i.e., the Crissy Field Center and the future use of the Commissary), as well as the loss of visitor parking that has resulted from the combination of Presidio Parkway and introduction of this new use (NPS). Assume that the 213 parking places in the new parking lot would also be available for their visitors (Crissy Field Dog Group).

Response: As described in the EA, the parking lot to the south and west of the buildings is expected to adequately serve the needs of Sports Basement. The Commissary area is too far removed from the project site to be served by the parking lot adjacent to Buildings 1183-1185, and parking demand for a cultural institution at the Commissary site would be met by parking areas nearer the site. The 370-car parking area at East Beach has adequate capacity to serve visitors to the Crissy Field Center and East Beach.

Comment: Address the compatibility and safety of parallel parking along Mason Street with pedestrian and bicycle use within the context of proposed modifications to the north side of the warehouses (NPS).

Response: The number of parallel parking spaces along the south side of Mason Street would be reduced to accommodate a new sidewalk and expanded deck. The planned sidewalk would improve pedestrian conditions and the reduced number of parallel parking spaces would reduce conflicts between parking motorists and cyclists in the eastbound bike lane of Mason Street.

Comment: Explain the predicted difference in peak visitation and associated parking utilization from current condition to the proposed future condition (NPS).

Response: The greatest factor in variability of visitation to Crissy Field is weather. Weather conditions are likely to be a factor in the variability of any visitor-oriented use in the district. The difference in weekday parking demand and weekend parking demand for Sports

Basement is expected to complement the parking needs in the adjacent Letterman district, which is expected to have a weekday demand greater than weekend demand.

Light and Glare

Comment: Ensure that skylights and the building connectors will not allow for fugitive light from within the building (NPS).

Response: The PTMP and Trust's Standard Measures for Lighting (in preparation) require that light trespass, including uplight, be minimized. The project design would implement best lighting practices to minimize interior and exterior fugitive light as required by the PTMP. Refer to the discussion of light and glare in the Environmental Consequences section.

Comment: Allow NPS to review lighting details once they are designed to protect natural darkness in Area A of the Presidio (NPS).

Response: Lighting design of the parking lot would be subject to additional NEPA/NHPA (N²) review, at which time NPS would be given the opportunity to participate and comment.

Historic Resources

Comment: Consider modifying the area of potential effect (APE) for the undertaking to include the full extent of the Crissy Field (Area B) district or the entire Presidio NHL district (NPS, SHPO).

Response: The Trust expanded the APE to encompass the entire Crissy Field (Area B) district for the purposes of its identification and assessment of effects. The APE still includes the portion of Area A east of Crissy Marsh, directly across Mason Street from the warehouses.

Comment: Review the project under either Stipulation VII or Stipulation IX rather than Stipulation X of the PTPA as it does not meet the definition of a “future planning document” but rather is an individual undertaking involving new construction (ACHP, SHPO).

Response: Since 2002, the Trust has reviewed undertakings accompanied by an EA or an EIS through Stipulation X of the PTPA in order to afford a greater level of consultation and participation from parties to the PTPA than that which is afforded under Stipulation VII. Although the PTPA does not specifically define an EA or an EIS as a “future planning document,” the Trust has interpreted them as such during past consultations (such as the Main Parade EA). This issue is being addressed in the revision of the PTPA that is currently underway. In any case, the proposed action does include approximately 4,300 square feet of new construction, primarily associated with the new connecting structures between Buildings 1182/3, 1183/4, 1185/6 and 1186/7, which meets the criteria of “new construction that may have an adverse effect on historic properties” contained in the language of Stipulation X. While Stipulation IX(C) also refers to “new construction that may have an adverse effect on historic properties,” it was primarily intended to address stand-alone new construction in the Presidio NHL district. Although the Trust feels that the proposed new construction at the Montgomery Street warehouses has been successfully designed to avoid adverse effects, it nevertheless should be assessed through consultation, and concurrence should be reached on this finding prior to concluding the process. For this reason, the Trust contends that the process described under Stipulation X, and that proposed in our July 12 letter initiating consultation, is the best means for reviewing the undertaking. We will confirm that this approach is acceptable with the SHPO’s office prior to convening a consultation meeting on the proposed action.

Comment: Make a National Register eligibility determination for the Mason Street warehouses in order to inform future consultation. The information provided in the first consultation package does not enable analysis of the project to ensure that it conforms to the Standards, Principles or Guidelines (ACHP, SHPO).

Response: The information provided in the July 12 consultation package was intended only to initiate consultation, not provide sufficient information to assess the project relative to the Standards, Principles or Guidelines. As stated in the July 12 cover letter, the second consultation package will include a Historic Resources Evaluation, which will document the history of the buildings, identify character defining features, include drawings that illustrate the project, and summarize the determination of effect based on the proposed undertaking. The package (which will accompany this EA submittal) will include adequate information for assessing the undertaking against the standards cited in the comment. The HRE also addresses the local, state, and National Register eligibility of the resources, finding that the warehouses are not individually eligible for listing on the National Register (though remain contributors to the Presidio NHL district).

Comment: Ignore the guidance in the NEPA and NHPA Handbook for Integrating NEPA and Section 106 (CEQ et al. 2013) since the PTPA was executed prior to the issuance of the handbook (ACHP).

Response: In its July 12 letter initiating consultation, the Trust referenced guidance in the handbook primarily as a tool for informing the public as to our plans for coordinating the communication strategies and timing of the concurrent NHPA and NEPA reviews. The intent is to use guidance for coordination of these processes; it is not to substitute NEPA review for NHPA review. The handbook offers a very user-friendly summary of the sometimes confusing relationship between NHPA and NEPA. Referencing the handbook benefits the public in particular for its clarifying approach. As such, we plan to follow guidance in the “Opportunities for Coordination” that appears on page 25 of the handbook. Referencing the handbook is not meant to replace or circumvent the PTPA process, but rather to follow the letter of the PTPA while providing a clear reference tool to members of the public for the timing and coordination of NEPA and NHPA reviews.

Comment: Leave the building interiors natural as they exist now and not painted white as shown in the scoping exhibit (Courtney Clarkson).

Response: Plywood sheathing on the interior walls would be required at select locations as part of the seismic upgrade, but the buildings' framing, structural system and interior finishes would be left exposed and unfinished in order to retain the character of a utilitarian warehouse space.

Natural Resources

Comment: Conduct an analysis of the effect of increased pedestrians and car traffic on the bird population at Crissy Marsh (Crissy Field Dog Group).

Response: Crissy Marsh is a high use area for birds, and the area is fenced and closed to people and dogs. Signage is provided to educate visitors on the access restrictions. According to the NPS, birds that use the marsh are generally not subjected to disturbance (except from dogs gaining access to the marsh at the tidal inlet). The relocation of Sports Basement to the proposed location more distant from the marsh and closer to the Marina Gate would make the possibility of birds being subjected to impacts from Sport Basement customers even more remote. Therefore, such an analysis is not warranted.

Cumulative Impacts

Comment: Include the following existing, future or potential future projects in the cumulative traffic impact analysis:

- the Marina Green
- the Saint Francis Yacht Club
- future use of the former Commissary Building
- future use of the Palace of Fine Arts building
- completion of the Presidio Parkway (NPS, Crissy Field Dog Group)

Assume for the purposes of the analysis that the current Crissy Field Center operated by the Golden Gate National Parks Conservancy at East Beach will remain in place and in use for the long-term (NPS).

Response: The traffic analysis for the MPU EIS used seasonally adjusted traffic counts from January 2008 as a baseline. Any active uses in the area at that time would be accounted for in those traffic counts and therefore the MPU EIS analysis. Any activity at the Marina Green, Saint Francis Yacht Club and the Crissy Field Center in Building 603 is reflected in the analysis. Although the future use of the Palace of Fine Arts is unknown, the baseline for the MPU EIS considered the Exploratorium as a tenant of the building. The impact of future uses of the Palace of Fine Arts or the Commissary site would be evaluated as part of the review process for those respective projects.

The Trust had already assumed that the Crissy Field Center would be a permanent structure when its relocation was originally reviewed by the public in 2009. At that time, the NPS anticipated no increase in facility use and no increase in traffic at the relocated Building 1199 site. Therefore, the January 2008 traffic counts take the Crissy Field Center into account.

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Attachment 1

FINDING OF NO SIGNIFICANT IMPACT

FINDING OF NO SIGNIFICANT IMPACT

This finding of no significant impact (FONSI) provides the basis for the Presidio Trust's (Trust) determination that rehabilitating the Mason Street warehouses (Buildings 1182, 1183, 1184, 1185, 1186, 1187 and 1188) for the long-term location and operation of the Sports Basement in Area B of the Presidio, as analyzed in the attached Sports Basement 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 proposed action and its environmental consequences are contained in the EA, which is incorporated by reference into this FONSI.

PROPOSED ACTION

Under the proposed action, the seven warehouses would be rehabilitated and used as a sporting goods store and recreational program center. Building alterations would include conjoining the structures, extending the existing loading docks, inserting new door openings, installing ridge skylights, and removing select interior partitions. Following the proposed alterations, there would be approximately 93,000 square feet (sf) of internal space, of which approximately 7,000 sf would be new construction for building connectors, and 16,000 sf of existing and 6,500 sf of new elevated exterior decks. Uses would include mercantile, assembly and program spaces (both indoor and outdoor), business/office space, and accessory uses (storage, mechanical, restrooms, and outdoor circulation). A 213-space parking lot would be constructed as part of the Presidio Parkway project to the south and west of the warehouses.

OVERALL OBJECTIVES

Protecting the historic character and integrity of the National Historic Landmark (NHL) district while allowing the changes that will maintain the Presidio's vitality was identified as an important objective in the Presidio Trust Management Plan (PTMP), the Trust's comprehensive land-use plan for Area B adopted in 2002. In the PTMP, the Trust envisions undertaking site enhancements and historic building rehabilitation at Crissy Field to accommodate uses and visitor amenities that would complement the spectacular bayfront. The proposed action fulfills the Trust's vision for this site of the Presidio by achieving all of the following objectives intended by the project purpose:

1. The proposed action will protect and enhance the historic buildings that are a contributing feature to the NHL district through rehabilitation and reuse;
2. The proposed action will bring the buildings up to safe occupancy standards in compliance with applicable building codes;

3. The proposed action will help fulfill the PTMP planning concept for Crissy Field (Area B) as a Bayfront Recreation and Cultural Destination by reusing the buildings for activities compatible with the area's open space and recreational opportunities; and
4. The proposed action will generate revenue to support the ongoing operation and enhancement of the Presidio.

ALTERNATIVES

The following alternatives were considered in the EA analysis or eliminated from detailed study.

Cultural and Educational Center/Offices (PTMP Alternative or No Action)

Under this alternative, the warehouses would be rehabilitated and used for multiple purposes, including visitor-oriented and office uses. The three easternmost warehouses along Mason Street would include cultural facilities and educational programs "celebrating the area's diverse historical, cultural and natural resources." Amenities could include visitor facilities, interpretive sites, exhibit space, museum use, performing arts, community or training facilities, artists' studios, education centers, libraries and archives, and classrooms. The remaining warehouses would be used as offices, including non-profit and profit. This alternative was not selected because, after considerable time, effort and outreach, the Trust has been unable to identify a tenant with the financial means to rehabilitate the warehouse buildings for the preferred PTMP uses.

Warehouses

Under this alternative, the buildings would be used for general storage and warehouse use as previously carried out as part of the Trust's short-term leasing program for the buildings. Warehouse use was not carried forward for analysis in the EA because it does not provide the

financial means to rehabilitate the buildings and does not contribute to the Trust's larger vision for Crissy Field as a visitor-oriented district as identified in the PTMP.

Sports Basement at Former Commissary Site

Under this alternative, the Sports Basement would remain at its present location in the former Commissary building. This alternative was eliminated from detailed study in the EA because it would not rehabilitate and reuse the historic Mason Street warehouses and therefore contribute directly to the Trust's primary goal of resource protection. Furthermore, the Sports Basement lease of the Commissary site was always considered to be a short-term use, as the Trust has long considered the Commissary as a premier location for a cultural institution.

Sports Basement at Other Alternative Sites

This alternative was not analyzed as a viable alternative in the EA because it would neither rehabilitate the warehouse buildings nor contribute to the vitality of Crissy Field. In addition, the few identified buildings in the Presidio that provide approximately 90,000 square feet of space are preferred in the PTMP for other uses, are otherwise leased and/or occupied, would require extensive renovation resulting in an adverse effect to the historic properties, and would generate more traffic elsewhere from the relocation.

DISPOSITION OF SIGNIFICANT ENVIRONMENTAL EFFECTS

Based upon the EA, the Trust determines that the proposed action will not have direct, indirect or cumulative significant impacts on the human environment. The analysis supporting this conclusion is presented in the Environmental Consequences section of the EA. The following summarizes factors considered in this determination.

Visitor Use and Experience

The proposed action will not adversely affect the existing visitor experiences and uses of parklands. Relocation of the Sports Basement to the project area will not result in any noticeable change to recreational and visitor uses at East Beach. The store's programs and services will continue to provide opportunities for engagement in the park, which would maintain visitor satisfaction, enjoyment and understanding.

Transportation

The proposed action will not substantially increase traffic congestion. The planned changes to the parking lot surrounding the warehouse buildings will slightly reduce the volume of traffic through the Marina Gate, and the planned signal timing changes to the Marina/Mason/Lyon intersection would reduce traffic congestion on weekends. The planned sidewalk on the south side of Mason Street will improve pedestrian safety.

Parking

The Trust does not consider the lack of parking supply to be a significant environmental effect under NEPA. Nonetheless, the parking demand associated with the proposed action will be accommodated within the proposed supply. Transportation demand management (TDM) strategies including parking management in Area B will encourage the use of alternative

modes and minimize parking demand. Implementing parking management strategies in Area A as encouraged in the PTMP EIS, recommended in the NPS General Management Plan Amendment (GMPA) EIS, and in place elsewhere in Area A will mitigate the potential effect on parking conditions at Crissy Field's East Beach.

Historic Resources

The proposed action will result in a localized adverse effect to the Mason Street Warehouses due to the amount of historic fabric removed from the warehouse structures and the reconfiguration of seven separate (but interrelated) buildings into a single tenant space. This finding is limited to the buildings themselves, and not the adjacent landscape features or NHL. As a result, the proposed action will not significantly impact the historic resources of the Presidio. Building rehabilitation will adhere to the PTMP Planning Principles and Guidelines for the Crissy Field (Area B) district. Rehabilitation, seismic and system upgrades, and the return of these buildings to use will have a beneficial impact, as will the installation of landscape, parking and site circulation features that are compatible with those completed elsewhere in the district.

Archaeological Resources

The proposed action will not likely adversely affect any known or previously identified archaeological properties in the project area. Archaeological resources will be protected by adhering to procedures outlined in the PTMP Programmatic Agreement (PTPA). An Archaeological Management Assessment (AMA) will be prepared for the project to ensure that any discoveries are handled in accordance with all stipulations of the PTPA.

Visual Resources

The proposed action will not substantially alter scenic views or degrade current visual conditions. Rather, the new use will require minimal change to the defining visual

characteristics of the buildings and the project area. Building rehabilitation and area improvements conducted in accordance with PTMP principles and guidelines will have a positive visual effect on the buildings, which will enhance the existing visual character along Mason Street.

Light and Glare

The proposed action will minimize light pollution. Code-required lights will be installed where egress, accessibility, and personal safety are principal concerns. The lights will 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. 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.

Water Resources

The proposed action will not likely affect surface drainage, increase runoff or erosion. Minor changes to the area topography, such as reducing the amount of pervious surface, will reduce the overall runoff generated from the project. A storm drain system will be installed to prevent flooding and route storm water to Outfall A. The parking lot constructed by the Presidio Parkway project will include any required storm water treatment measures. No project-generated storm water will be discharged to Quartermaster Reach.

Sea Level Rise

The Trust will incorporate consideration of the impact of sea level rise on the proposed action during building design review. No additional adaptations to anticipated sea level changes are

warranted. The Trust will monitor climate change issues and incorporate best practices as they evolve to reflect the scientific information available.

Hazardous Substances

The characterization of contaminated sites, exposure pathways, and potential health risks associated with reuse and redevelopment at the Presidio are addressed under regulatory controls separate from the NEPA process. Nonetheless, hazardous materials have only a minimal potential to affect the proposed action based on the extent of contamination defined in ongoing investigations and the status of remedial actions. Because the risk of human exposure is low and precautionary measures will be implemented as necessary, potential impacts to human health, safety and the environment due to hazardous substances will not be significant.

Cumulative Impacts

The effects of the proposed action when added to the aggregate effects of identified cumulative actions will not be significant. There will be no change in the level of activity occurring at the relocated sporting goods store as compared to its current location. There will be no increase in personnel or customers or associated traffic. While not a significant impact, there will be a Crissy Field-wide cumulative parking shortfall during peak weekends that could be accommodated by readily available TDM measures identified in the PTMP and GMPA that will result in more efficient use of the parking spaces provided. In general, the incremental contribution of the relocated sporting goods store to the cumulative impact on Crissy Field (Areas A and B) or the Presidio at large will be neutral, essentially being a shift in location of existing impacts, or beneficial, as discussed in the cumulative impact analysis.

COMMENTS ON THE PROPOSED ACTION AND ENVIRONMENTAL ASSESSMENT AND CHANGES MADE IN RESPONSE

The Trust announced the availability of the Sports Basement EA on October 10, 2013 through a home page banner on its website (www.presidio.gov), in the October 10th and the October 30th editions of the Presidio e-news, the Trust's frequent electronic update of news and events in the park that is sent out to approximately 9,000 subscribers, and an October 16th announcement to Presidio e-news subscribers. The announcements urged readers to learn more about the project by reviewing the Notice of Availability and Request for Comments (Trust 2013d), which briefly described the project and its objectives and invited public comment. The Trust also notified a number of agencies and organizations as to the availability of the EA, including the National Park Service, the National Trust for Historic Preservation, the State Historic Preservation Officer, and the City and County of San Francisco. By the close of or shortly after the review period for the EA ending November 15, 2013, the Trust received one letter from a public agency (the National Park Service; see Attachment 4 of the EA for a copy of the letter), two emails from local organizations (Neighborhood Associations for Presidio Planning and Crissy Field Dog Group), and 18 emails from interested individuals (see table). Of the 23 letters and emails received, approximately half were nonsubstantive, generally expressing support for the project. Comment letters are available for review at the Presidio Trust Library and constitute part of the formal public record.

Also, in the March 13, 2015 issue of the Presidio e-news, the Trust invited the public to comment on its intent to conclude the NHPA process for the project. No responses to the announcement or requests for further information were received.

Public Agencies, Organizations, and Individuals Submitting Comments on the Sports Basement Environmental Assessment

Public Agencies

United States Department of the Interior, National Park Service, Golden Gate National Recreation Area, Division of Planning

Organizations

Crissy Field Dog Group

Neighborhood Associations for Presidio Planning

Individuals

Kara Allen
Les Barclay
Boriana (2)
Douglas Corley
Brandon Duncan
Jeff Finn (2)
Jay Framson
Karen Mendelsohn Gould
David Hale

David Hartley
Sharon Hoffman
Susan Ives
Devon Johnson
Adrienne Leifer
Fernando Montero
Diane Portnoy
Kim Regan
Ditka Reiner

The Trust fully assessed all issues raised by the comments received during the review period, and responded to the comments in the following ways:

- a further breakdown of the 100,000 sf of retail space within the Crissy Field (Area B) district was provided (Responses to Comments, Proposed Action);
- the discussion of visitor experience was amended to take into account the change in visitor use that would occur at the Mason Street warehouses (Visitor Use and Experience);

- the evaluation of impacts on the visitor experience was supplemented with quantitative information on the number of people that would be expected to visit the retail store and go on to participate in recreational activities at Crissy Field (Visitor Use and Experience);
- the impacts of special events on the visitor experience at East Beach was provided (Visitor Use and Experience);
- the 22,500 sf of exterior spaces, which may be used for community gatherings and events, was taken into consideration in the land use calculations and impact analysis (Transportation);
- TDM commitments from the tenant to encourage its employees to use alternative transportation modes and to avoid parking in East Beach will be included in the lease agreement (Parking).
- the total number of skylights was reduced, the western deck was eliminated, and the amount of historic fabric removed was reduced in response to comments from the NPS and SHPO (Cultural Resources)
- a mitigation measure to ensure that signage is consistent with Trust guidelines was added to minimize intrusion on the visual landscape (Visual Resources).

A summary of and responses to these comments are provided in Attachment 5 of the EA.

MITIGATION MEASURES TO AVOID OR MINIMIZE POTENTIAL ADVERSE ENVIRONMENTAL IMPACTS

The Trust will implement, as necessary, all mitigation measures identified in the EA that were included as part of the proposed action to avoid or minimize environmental impacts that could result, and will coordinate with other public agencies as necessary. Mitigation commitments contained in the EA that will be implemented include the following:

-
- The Trust will coordinate management actions and protection measures in Area B with the NPS to control visitation to ensure that safe conditions are maintained and appropriate uses of the park can be enjoyed by visitors (Visitor Use and Experience).
 - The Trust will require appropriate permit conditions for organized events affiliated with Sports Basement and will schedule/coordinate such events with the NPS to minimize visitor use impacts and ensure that park resources are protected (Visitor Use and Experience).
 - The Trust will coordinate with the NPS to determine the most appropriate location for the pedestrian crossing of Mason Street to best integrate with planned circulation changes at East Beach (Transportation).
 - The Trust will encourage NPS to implement parking regulations, time-limits and/or parking fees in order to reduce impacts of fee parking in Area B on East Beach. The Trust will provide assistance to the NPS to ensure coordination and consistency of parking management within both Areas A and B (Parking).
 - The Trust will ensure that the rehabilitation and adaptive reuse of the Mason Street warehouses will adhere to the Secretary of the Interior's Standards for Rehabilitation and the PTMP Planning Principles and Guidelines for the Crissy Field (Area B) district, and the terms of the Memorandum of Agreement (MOA) executed in consultation with the NPS and SHPO (Historic Resources).
 - The Trust will protect archaeological resources by adhering to procedures outlined in the PTPA. An AMA will be prepared for the project to ensure that any discoveries are handled in accordance with all stipulations of the PTPA (Archaeological Resources).
 - The Trust will follow 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 area (Visual Resources).

- The Trust will apply design, construct, install and maintain signs consistent with its draft Guidelines for Non Residential Exterior Tenant Signs to minimize intrusion on the cultural landscape (Visual Resources).
- 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 Lightings. Best lighting practices will be reviewed, including use of BUG (Backlight, Uplight and Glare) ratings and photometric analyses, to avoid light trespass into adjacent natural areas (Light and Glare).
- The Trust will require a Storm Water Pollution Prevention Plan (SWPPP) to be developed and implemented during construction to control sediment in construction site runoff. The SWPPP will require construction and implementation of BMPs (e.g., silt fencing, jute netting, and wattles) to reduce pollutants in storm water discharges from the construction site (Water Resources).
- The Trust will review the buildings' design prior to occupancy to ensure they meet applicable building code performance objectives for construction and modifications of buildings within flood hazard areas. The Trust will monitor climate change issues and incorporate best practices as they evolve to reflect the scientific information available (Sea Level Rise).

The Trust's Project Manager will be responsible for implementing the mitigation measures.

SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT (NHPA)

The Trust afforded signatory and consulting parties an opportunity to comment on the project and its effects, and has taken into account the effects of the project on historic properties in compliance with 36 CFR Part 800 and according to the terms of the Presidio Trust Programmatic Agreement. In response to NPS and SHPO comments about the originally proposed design, the project was altered to reduce the impact to cultural resources over a series of consultation meetings between November 2013 and December 2014. These revisions included the elimination of exterior fire pits, reduction in the amount of historic fabric removal for opening up and connecting the pairs of warehouses in the north south direction, elimination of the new deck on the west elevation of Building 1185, introduction of a bi-fold door to minimize the visual effect of a new, large glazed opening on the west end of Building 1185 and eliminating one (Building 1184) of the seven large skylights. While the parties agreed that the changes lessened the effect from what would have resulted from the originally proposed design, it was determined that there remained localized adverse effects due to removal of historic fabric and changes to the spatial relationship and character of this group of buildings. These issues remained as barriers to reaching consensus on the preliminary finding of “no adverse effect.”

The Trust notified the Advisory Council on Historic Preservation of its revised finding of “adverse effect” for the project and its intention to develop a Memorandum of Agreement (MOA) to resolve the adverse effects on April 10, 2015. Minimization and mitigation measures agreed to under the MOA are as follows:

- The Trust will prepare Historic American Buildings Survey (HABS) documentation of buildings 1182-1188 at the appropriate level, identified in consultation with the NPS HABS program.

- The Trust will install informative public interpretation materials inside the Mason Street warehouses, or at a publicly accessible location adjacent to the buildings.
- The Trust will stipulate in the tenant lease agreement that the bi-fold door on the west elevation be closed during off-hours.
- The Trust will provide an opportunity for NPS and SHPO review and comment on the seismic design and interior wall treatments at a pre-determined point in the process.


The Trust signed the MOA on May 18, 2015, and a full copy of the document with signatures by the NPS and SHPO was submitted to the ACHP on June 9, 2015. The full text of the MOA is included as Attachment 6. The Trust will carry out the above measures to ensure that adverse effects are resolved according to the terms of the MOA, historic properties will not be adversely affected in an unanticipated manner, and that cumulative effects to the National Historic Landmark will not be adverse.

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, it is the determination of the Trust that the proposed action 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 region. The proposed action is neither scientifically nor publicly controversial. Implementation of the proposed action 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 proposed action is not precedent-setting nor will it automatically trigger other actions which may require environmental impact statements.

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 proposed action, rehabilitation of the Mason Street warehouses for the Sports Basement, at the earliest possible time.

RECOMMENDED:



John Pelka
Compliance Manager, Presidio Trust

6/25/15
Date

APPROVED:



Andrea M. Andersen
Acting General Counsel, Presidio Trust

6/25/15
Date

Attachment 2

SPORTS BASEMENT COMMUNITY ENGAGEMENT AND VISITOR OPPORTUNITIES

SPORTS BASEMENT COMMUNITY ENGAGEMENT AND VISITOR OPPORTUNITIES

Sports Basement promotes healthy lifestyles and enjoyment of the outdoors by offering free fitness classes, facilitating group workouts, and hosting educational and cultural events. The store raises money for non-profit groups and shares its resources in the form of cash and in-kind donations, donated staff hours, free use of store space for community groups, and training clinics on topics relating to sports and the outdoors. The store also offers low-cost bike and gear rentals to make it possible for visitors and those new to the outdoors to tour the Presidio, bike across the Golden Gate Bridge, or try a new sport without making an expensive purchase.

Bike Rentals: Bikes are a popular way to tour the Presidio and the city and Sports Basement offers the lowest-cost rentals in the city. Approximately 20,000 people rent bikes from the Presidio store annually.

Free Fitness and CPR Classes: The following free classes are offered at the Presidio store:

- Yoga: 750 participants/year
- Run Group: 1,500 participants/year
- Bike Group: 2,500 participants/year
- CPR Training and Certification: 500 participants/year
- Bike Maintenance Class: 180 participants/year

Supporting Community Groups: Sports Basement has a revenue-sharing program that allows non-profits to receive up to 20 percent of dollars spent in the store by their supporters. In 2012, the Presidio store donated \$114,000 in shared revenue to 197 non-profit groups.

Sports Basement offers community groups free use of store space to host meetings and parties. The Presidio store hosts 1,800 community-group events per year. Participating groups include sports and outdoors clubs and training programs, schools and booster groups, youth sports groups, and non-profits. Approximately 600 community groups took advantage of this in 2012.

Sports Basement staffers share their expertise, offering bike-maintenance classes and gear clinics to community groups. Free, hands-on bike maintenance classes are held twice per month with an average attendance of seven participants per class. In the summer of 2013, Sports Basement staffers taught six bike-maintenance classes to 120 WheelKids campers aged 5-12 years.

The store also offers its space as an event venue to community groups. Groups hosting major events at or starting from the store include the Manuia Polynesian Revue, San Francisco Marathon, SF Montessori School, WheelKids Bicycle Club and Team in Training.

Supporting Schools: Sports Basement raises money for SF schools in two ways. For every charge purchase in which a customer chooses debit over credit, Sports Basement donates a portion of the savings in fees to the SFUSD. The Presidio store donated \$9,000 in 2011. The company also has an ongoing revenue-sharing program with individual schools and donates \$250 in gift cards to each school in the program to use for their own fundraisers or to purchase goods. 120 SF schools participated in 2012, earning a total of \$101,000 in revenue-sharing dollars and \$25,000 in gift cards.

Sports Basement's uniform-printing program is aimed at helping make participation in team sports affordable and accessible. Approximately 100 school groups placed uniform orders with Sports Basement in 2012.

Speaker Series Events and Cultural Programming: Sports Basement brings in speakers on topics related to outdoor sports, travel, fitness, nutrition, health. Through a collaboration with Green Apple Books, the Presidio store is bringing in authors of books whose topics interest the Presidio community. Authors in 2013 have included ultra-endurance swimmer Lynne Cox and 34th America's Cup Races writer Julian Guthrie. In 2012 the store hosted 31 speaker series events with an approximate attendance of 1,300 people.

The store also hosts outdoor-sports film festivals like Reel Rock Film Fest and LunaFest. All programming is open to the public and most events are free to attend (the few that are not free require a small donation to a charity).

Free Services to Presidio Visitors: Sports Basement provides free basic bike services to the public, including flat-tire repair and minor adjustments. In 2012 the Presidio store provided \$50,000 worth of free bike service to 2,000 customers. No purchase is required (except for the purchase of parts, if necessary).

Sports Basement is home to a Presidio Parkway computer kiosk and a source for free Presidio maps, directions and transit assistance for visitors.

Activities for Kids and Parents: Sports Basement offers a twice-weekly toddler music class (small donation requested) with an attendance of 2,500 participants/year as well as a kids' play area at the front of the store.

Volunteering in the Community: Sports Basement staffers provide free services to participants in Sunday Streets, AIDS/LifeCycle, Bike to Work Day, and the Escape From Alcatraz. They provided 400 hours of labor to these events in 2012. Employees set up a cheering squad outside the store for every race that passes the store. There were cheering squads for 12 races in 2012 including the Escape From Alcatraz, SF Marathon, Nike Women's Marathon, the Giant Race, and the Presidio 10.

SB Outdoors: SB Outdoors is a new program offering guided introductory mountain-biking and climbing trips to the public. In addition to the public trips, Sports Basement donated four trips in 2013 to Boys and Girls Clubs of SF to introduce underserved youth to the outdoors. The approximate value of each trip is \$6,000-\$8,000 and involve 66 employee hours.

Partnership in Presidio Events: Sports Basement was actively involved in the Golden Gate Bridge 75th celebration. The store provides support to corporate groups volunteering in the Presidio. The store provides space, staff hours and logistical support to races taking place in the Presidio (Escape From Alcatraz, Guardsmen Presidio 10).

Attachment 3

SCOPING LETTERS OF FEDERAL AND STATE AGENCIES

ADVISORY COUNCIL ON HISTORIC PRESERVATION



August 2, 2013

Mr. Craig Middleton
Federal Preservation Officer
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

Ref: *Rehabilitation and Adaptive Reuse of the Mason Street Warehouses
Crissy Field (Area B) District, Presidio of San Francisco National Historic Landmark
San Francisco, San Francisco County, California*

Dear Mr. Middleton:

On July 16, 2013, the Advisory Council on Historic Preservation (ACHP) received your consultation package pursuant to Stipulation X of the *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 Implementation Plan and Various Operation and Maintenance Activities For Area "B" of the Presidio of San Francisco, Golden Gate National Recreation Area (PA)* regarding the referenced project. We understand from this notification that the rehabilitation and adaptive reuse of seven buildings that contribute to the Presidio of San Francisco National Historic Landmark is being considered a "future planning document" which is defined under Stipulation VII(A)(3) as "undertakings that are future planning documents (including possible district-level plans, issue-oriented plans, and site-specific design guidelines), and demolition of historic properties or new construction that may have an adverse effect on historic properties when proposed pursuant to such future planning documents."

After reviewing the information provided by the Presidio Trust, the ACHP feels that this project does not meet the definition of a "future planning document" but is an individual undertaking that relates to the ongoing operation and maintenance of the Presidio and has minimal or low potential for affecting historic properties as defined under Stipulation VII(A)(2). As such the ACHP believes this undertaking should be reviewed under Stipulation VII(B)(2) of the PA.

If the Presidio Trust plans to continue consultation under Stipulation X for this project, the ACHP requests a more detailed, "planning" document. According to Stipulation X, the consultation package should include either a district-level plan, issue oriented plan, site-specific guidelines, or other implementation plans. The information provided to date does not explain what type of plan is being utilized (district-level plan, issue-oriented plan, or site-specific design guideline) nor does it provide information to enable analysis of the project to ensure that the "planning document" conforms to *The Secretary of the Interior's Standards for the Treatment of Historic*

ADVISORY COUNCIL ON HISTORIC PRESERVATION
1100 Pennsylvania Avenue NW, Suite 803 • Washington, DC 20004
Phone: 202-606-8503 • Fax: 202-606-8647 • achp@achp.gov • www.achp.gov

THE PRESIDIO TRUST
EXECUTIVE OFFICE
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Properties with Guidelines for Preserving, Rehabilitation, Restoring, and Reconstructing Historic Buildings, the Presidio Trust Management Plan Planning Principles, or the Planning District Guidelines for designated planning districts within Area B of the Presidio as required by the PA (Stipulation X(A)). Once this information has been received, the ACHP will be able to provide comments on the future-planning document.

Given the existence of the PA, the ACHP feels that it is inappropriate to use the *NEPA and NHPA: Handbook for Integrating NEPA and Section 106 Reviews* since the PA was executed prior to the issuance of this handbook. However, the ACHP encourages the use of the *NEPA and NHPA: Handbook for Integrating NEPA and Section 106 Reviews* in the separate Section 106 consultation to revise the PA.

Thank you for your notification. If you have any questions or require our further assistance, please contact Ms. Katharine R. Kerr at (202) 606-8543 or via e-mail at kkerr@achp.gov.

Sincerely,

Caroline D. Hall
Assistant Director
Federal Property Management Section
Office of Federal Agency Programs

NATIONAL PARK SERVICE



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-PLAN)
AUG 12 2013

John Pelka, Compliance Manager
The Presidio Trust
PO Box 29052
San Francisco, California 94129

Re: National Park Service Public Scoping Comments Regarding the Sports Basement Relocation Environmental Assessment

Dear Mr. Pelka:

Golden Gate National Recreation Area (GGNRA) staff reviewed the information provided in the Public Scoping Notice for the Sports Basement Relocation Environmental Assessment (EA) and the information that was presented at our July 24, 2013 Project Review meeting. The National Park Service (NPS) has an interest in this project for several reasons, one of them being the proximity of Buildings 1182-1188 to Crissy Field (which is in Area A managed by GGNRA) and the Presidio's Mason Street entrance. Leasing decisions for buildings adjacent to Crissy Field can have an effect on the management and overall visitor experience of the nearby areas, which in this case includes the popular East Beach at the east end of Crissy Field. We look forward to continuing our work together to ensure that any potential impacts from development are minimized and that uses in the built space along Mason Street are compatible with open space and recreational opportunities provided in Area A, consistent with the Presidio Trust Management Plan (PTMP) – Crissy Field (Area B District). It is in this spirit that we provide the following scoping comments for your consideration:

Land Use and Visitor Experience

As articulated in the PTMP, Crissy Field is a bay-front recreation and cultural destination that will remain the front yard of the Presidio with uses and improvements that complement the spectacular park that the Crissy Field shoreline has become. Preferred uses for Crissy Field (Area B District) described in the PTMP are to include cultural facilities and educational programs celebrating the area's diverse historical, cultural, and natural resources. The EA should describe the proposed programming that would make an otherwise strictly retail use compatible for this district and location. We would like the EA to describe and consider decisions for building reuse and associated landscaping, circulation and parking with regard to their compatibility and effect on surrounding lands, particularly within Area A.

The PTMP included estimates for land use allocations by square feet by planning area (Table 39: Summary of Proposed Building Uses by Planning District). These land use projections were the basis for the general plan's estimates of visitation and specific impact topic analysis. For Crissy Field, this included assumptions for recreational and retail uses. The EA should identify any changes in building use square footage allocations as a result of the proposed action in combination with other leasing decisions of West Crissy and the resulting changes in impacts. Our concern is whether an increase in

retail and recreational use could result, individually or cumulatively, in parking and roadway congestion that was not anticipated in the PTMP.

A comparative analysis should be completed regarding the existing use and occupancy and the proposed use and occupancy and its cumulative context, including the Palace of Fine Arts/former Exploratorium space potential future use. Data gathered and analyzed should include but not be limited to: square footage by occupancy category, dedicated parking (recognized by a lease agreement), "effective" parking (the total number of adjacent parking spaces that were available to support occupancy even if not specifically dedicated in a lease), number of employees, number of visitors/customers, and square footage of external support areas such as a drop-off/turnarounds, etc.

The PTMP states that "Sensitive site enhancements and visitor-oriented uses will transform the area south of Mason Street into a friendly, welcoming space." The EA should disclose the specific improvements that would be made within the project area to achieve this. In particular, we are interested in understanding what changes and improvements would be made at the already confusing and challenging Mason Street entrance into the Presidio. This is an important vehicular as well as pedestrian and bicycle entrance into the Presidio. We would like to work with you to come up with a successful design solution for this area, including circulation improvements at the East Beach entrance/exit area, currently under consideration to improve safety. For many park visitors, their experience of this entrance sets the "tone" for the rest of their park experience and we want it to be a very welcoming and safe experience.

NPS is concerned about the potential increase of pedestrians in the area and requests that the Trust consider creating crosswalks along Mason Street to allow for safe crossing between both sides of Mason Street for visitors. Entrances to the store should be designed to reduce the impacts of pedestrian congestion and maximize pedestrian safety along Mason Street, including keeping primary entrances on the south side of the building

If the outrigger canoe use is also relocated to this area, safety of boat crossing on Mason Street and compatibility of this use at East Beach should be considered.

Traffic and Congestion

We request that the Presidio Trust (the Trust) quantify and analyze changes to Mason Street traffic as well as the Marina Gate as a result of this proposed reuse of the warehouses and in regard to overall capacity of the roadway and nearby intersections, including bicycle and pedestrian safety. The analysis should take into consideration the other existing and planned uses in the Crissy Field area, including the former Commissary's reuse and the West Crissy Field buildings. Though previously analyzed in the PTMP as well as the Presidio Parkway EIS, this information should be confirmed and updated.

Building 1199 at East Beach, currently home to the Crissy Field Center operated by the Golden Gate National Parks Conservancy, is projected to remain in place and in use until the completion of the Presidio Parkway project and the relocation of the Crissy Field Center to Presidio Building 603. It is not clear when this will happen as it is contingent upon the completion of the roadway project and necessary improvements to Building 603. A longer term use is also under preliminary consideration. Therefore, NPS requests that any related impact analysis (i.e. traffic, parking, circulation, visitor use) should assume that this building and use will remain into the foreseeable future.

NPS has concerns about traffic flows both into and out of the future parking lots surrounding the warehouses, and how these intersections will perform. We are interested in understanding the traffic

that may be generated by left turns into Sports Basement from Girard Road or Mason Street. In addition, we are concerned about potential back-ups that may occur along westbound Marina Boulevard if westbound Mason Street vehicles are waiting to turn into the parking lot east of the warehouses but eastbound Mason Street traffic flow is heavy.

Since Mason Street is occasionally closed for special events (i.e. foot races), the EA should address an alternative entrance/exit location for staff and customers to use on these days that is easily accessible and can handle the same level of inflow/outflow as the entrance on Mason Street.

Parking

Paid parking at the relocated Sports Basement could result in the need for NPS to manage parking at East Beach more closely or potentially charge for parking as well in order to avoid a shift of Sports Basement patrons to parking at East Beach, which is currently a free lot. The EA should consider alternatives, including free parking or validated parking for Sports Basement to avoid or minimize impacts to East Beach visitor parking.

The EA should consider the demand for parking in the area resulting from other future projects that are expected to occur in the vicinity (i.e. the future use of the Commissary), as well as the loss of visitor parking that has resulted from the combination of Presidio Parkway and introduction of this new use. The parking lot east of Halleck Street that was removed for Presidio Parkway construction and the area west of the proposed Sports Basement buildings previously served visitors to the area, including East Beach. It would be helpful to understand the proposed parking supply, parking demand, and management strategy for all of Crissy Field (Area B) when analyzing and assessing the effects of the Sports Basement relocation.

The EA should address the compatibility and safety of parallel parking along Mason Street with pedestrian and bicycle use within the context of proposed modifications to the north side of the warehouses.

The EA should also explain the predicted difference in peak visitation and associated parking utilization from current condition to the proposed future condition. For example, the previous Exploratorium office usage was highly predictable during the weekdays with extremely light use on weekends, which was ideal to accommodate the East Beach area across the street. The Sports Basement use of the warehouses will most likely have different utilization peaks that could very well correspond with other park visitor peaks (such as at East beach), which could have an adverse impact on traffic and congestion, safety, and visitor experience.

Natural Resources

Light pollution: The Trust should ensure that skylights and East/West glassed-in building connectors will not allow for fugitive light from within the building, as has been an impact of Planet Granite on the adjacent Area A airfield. NPS requests to review the building and streetlight details once they are designed to protect natural darkness in Area A of the Presidio.

Cultural Resources

NPS appreciates the opportunity to comment on the proposal as part of the Section 106 consultation process, and we look forward to additional information about the undertaking. For the purposes of Section 106 compliance, GGNRA and NPS Pacific West Regional Office offer the following consolidated comments:

The Area of Potential Effects (APE) seems too limited. We suggest that, at a minimum, the Presidio Trust consider modifying the APE for the undertaking to include the full extent of the Crissy Field Planning District.

NPS acknowledges that the Trust and the project designers have attempted to meet the *Secretary of the Interior Standards for Rehabilitation*, and that the Trust would like to achieve a finding of No Adverse Effect; however, given the extent of the proposed rehabilitation and the level of information currently available, we will reserve further comment until we have had an opportunity to review the Second Consultation Package, including the Historic Structure Evaluation, analysis, and finding of effect.

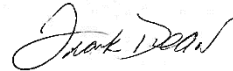
Cumulative Impacts

The following are future projects or potential future projects, and impact topics that NPS would like the Trust to include in their cumulative impact analysis:

- Potential long term use of Building 1199, the current Crissy Field Center at East Beach
- Future use of the former Commissary Building
- Future use of the Palace of Fine Arts building
- Completion of Presidio Parkway
- Transportation and Circulation

Thank you for the opportunity to provide our input on issues and concerns during the scoping period for this environmental analysis. We are encouraged to see a proposed rehabilitation and reuse of the historic Mason Street warehouses and look forward to continued coordination with you to ensure the long-term stewardship of Crissy Field and to ensure a seamless interface between Areas A and B of the Presidio. If you have questions or need further clarification regarding our comments, please contact Nancy Hornor, Planning Division Chief, at (415) 561- 4937.

Sincerely,



Frank Dean
General Superintendent

STATE HISTORIC PRESERVATION OFFICER

STATE OF CALIFORNIA – THE NATURAL RESOURCES AGENCY

EDMUND G. BROWN, JR., Governor

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

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Page 2 of 2

September 10, 2013

Reply In Reference To: TPT_2013_0717_001

Craig Middleton
Executive Director and
Federal Preservation Officer
The Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

RE: Section 106 Compliance, Proposed Rehabilitation and Adaptive Reuse of Seven Mason Street Warehouses, Presidio of San Francisco National Historic Landmark District

Dear Mr. Middleton:

Thank you for your letter dated July 12, 2013, regarding the proposed undertaking at the Presidio of San Francisco. The Presidio Trust is initiating consultation with the State Historic Preservation Officer (SHPO) in order to comply with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470f), as amended, and its implementing regulation at 36 CFR 800, and Stipulation X of the 2002 Presidio Trust Programmatic Agreement. The Presidio Trust intends to coordinate its Section 106 responsibilities with its NEPA compliance, using the scoping process for the Environmental Assessment to fulfill public notification requirements under Section 106. In support of the consultation letter, you provided the scoping notice for the project and map illustrating the Area of Potential Effects (APE).

The undertaking, as described, involves rehabilitation of Buildings 1182, 1183, 1184, 1185, 1186, 1187, and 1188, known collectively as the Mason Street Warehouses. The proposed scope of work includes the following:

- Landscape, streetscape, and parking improvements;
- Full seismic and building systems upgrades;
- Installation of ridge skylights;
- Connecting the buildings through new openings in existing walls;
- Extension of the historic loading docks; and
- Construction of approximately 4,000 square feet of connecting structures between the warehouses.

The Presidio Trust has identified the APE for this undertaking on a map attached to the consultation letter. The area indicated appears to include the warehouses and an area to the north, but no narrative description or justification of the APE is provided. The seven Mason Street Warehouses are contributors to the existing NHL, but it is not clear if they are also individually eligible for listing in the National Register of Historic Places (NRHP).

The Trust intends to continue consultation by preparing a Historic Resources Evaluation (HRE) and submitting it, along with the EA, for discussion at an upcoming consultation meeting and for written comments. Having reviewed the information submitted, the SHPO offers the following comments.

- Area of Potential Effect
 - At this time, it is not possible to comment on the sufficiency of the APE.
 - Please provide a narrative description and justification for the proposed APE.
 - Please provide a map showing greater detail of the area, including building footprints and numbers.
 - An APE that encompasses the Mason Street Warehouses area would perhaps be sufficient if it was a resource individually eligible for listing on the NRHP and not a contributor to the NHL district.
 - Because the warehouses contribute to the NHL district, the Trust should consider expanding the APE to include the district.
- Identification and Evaluation of Historic Properties
 - Please clarify if the Mason Street Warehouses have been evaluated for individual eligibility or eligibility as a district smaller than the NHL. The NRHP status will inform the assessment of effect.
- The SHPO agrees with comments submitted by the Advisory Council on Historic Preservation that Stipulation X of the PTPA does not appear relevant as no future planning document is mentioned in the August 2 letter or scoping document. However, rather than being reviewed under Stipulation VII(B)(2), the SHPO recommends review under Stipulation IX(C) as a project that includes demolition and new construction with the potential for adverse effects on historic properties.

Thank you for seeking SHPO comments and considering historic properties as part of your project planning. If you have any questions, please contact Mark Beason at (916) 445-7047 or mark.beason@parks.ca.gov.

Sincerely,

Carol Roland-Nawi, Ph.D.
State Historic Preservation Officer

Attachment 4

**NATIONAL PARK SERVICE LETTER COMMENTING ON
SPORTS BASEMENT EA**



United States Department of the Interior
NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94123

L76 (GOGA-PLAN)

NOV 25 2013

Mr. John Pelka
Compliance Manager
The Presidio Trust
PO Box 29052
San Francisco, CA 94129

Re: National Park Service Comments on the Sports Basement Relocation Environmental Assessment

Dear Mr. Pelka:

Golden Gate National Recreation Area (GGNRA) staff, in coordination with the National Park Service (NPS) Pacific West Region, has reviewed the Sports Basement Relocation Environmental Assessment (EA) released in October 2013. NPS has an interest in this project for several reasons. These include the proximity of Buildings 1182-1188, proposed as the Sports Basement long term location, to Crissy Field, in particular East Beach (which is in Area A, managed by NPS) and the Presidio's Mason Street entrance – a major entrance to this national park area.

We appreciate the responses the Presidio Trust (Trust) provided to our scoping comments; however, we still have strong concerns regarding the potential adverse impacts to the area surrounding the proposed location of Sports Basement and the effects on the visitor use and experience of this very popular area of Crissy Field. The EA does not adequately analyze and disclose impacts related to traffic, circulation, parking, and cultural resources, and does not provide mitigation measures to avoid or minimize what we believe will be serious impacts.

The project as proposed would create a combination of unmitigated traffic and parking impacts, as well as questions of compatibility of the proposed use, impacts to the arrival experience of park visitors, and concern that this intense use would over-program the east end of Crissy Field and could impact and limit the existing uses, such as the temporary Crissy Field Center and recreational uses in Area A, that rely on this location. For these reasons, we believe that this proposed location is inappropriate for this use as described in the EA.

We acknowledge that Sports Basement, as an interim Presidio tenant, has provided many benefits to Presidio residents and visitors beyond its retail services. The programs, community services and welcoming spaces for non-retail uses at the former commissary site have enhanced Sports Basement's compatibility in its current interim location. However, considering Sports Basement as a long term tenant in a different, and more prominent location, with many more competing uses and in a more challenging setting for traffic, parking, circulation and historic preservation, raises many concerns that we do not believe have been adequately disclosed and addressed in the Environmental Assessment.

We are also concerned with the proposed changes in land use identified in the EA's response to scoping comments (see table titled "Land Use Assumptions Used for the Transportation Analysis for the PTMP and Sports Basement"). Under the Sports Basement proposal the result would be a substantial increase in retail space in the Crissy Field Area B planning area (from 20,000 square feet to 100,000 square feet or

five times the space dedicated to retail as was previously analyzed). The table suggests that the Presidio Trust is contemplating other changes to the Presidio Trust Management Plan (PTMP) land use analysis for Crissy Field, including a reduction in other categories, such as cultural/educational and office, yet the effects of these changes are not fully disclosed nor analyzed in the EA. We are concerned that these proposed changes would make this "front yard" of the Presidio, as identified in PTMP, less park-like, and more commercial in nature.

The PTMP states that "The Presidio Trust will work with the National Park Service to ensure that the successful improvements made to Area A are carefully considered and complemented by activities and changes within Area B" (PTMP p. 70). In that spirit, we request that further analysis, mitigation, and confirmation that this use can meet that commitment precede a decision on this proposal.

Thank you for the opportunity to provide our comments regarding this environmental analysis. We look forward to continued coordination with you to ensure the long-term stewardship of Crissy Field and to ensure a seamless interface between Areas A and B of the Presidio. If you have questions or need further clarification regarding our comments please contact GGNRA Planning Division Chief, Nancy Hornor at (415) 561-4937.

Our detailed comments are provided in the attached document.

Sincerely,

Frank Dean
General Superintendent

cc: Craig Middleton, Executive Director, Presidio Trust

Attachments (1): NPS Comments on the Sports Basement Relocation Environmental Assessment

ATTACHMENT

National Park Service Comments on the Sports Basement Relocation Environmental Assessment

Purpose and Need

The purpose for the project is not clearly stated or defined and even appears to be missing entirely, which is a fundamental flaw for any NEPA document. A clearly defined purpose provides the nexus for developing a range of feasible alternatives that fulfill the purpose. Therefore, without a clear purpose we do not feel that the alternatives described in the EA can be fairly evaluated as an inclusive, reasonable range.

The way in which the EA is written could lead the reader to believe that the purpose of the EA is to find a long-term location for Sports Basement within the Presidio. If this is the purpose, then the range of alternatives presented in the EA are not inclusive of a variety of other feasible alternatives.

Additionally, the reader could also be lead to believe that the purpose of the project is to relocate the Sports Basement to Buildings 1182-1188. If this is true, then we feel that this Purpose is too narrow and does not allow for a reasonable range of alternatives to be developed.

Furthermore, the two alternatives that are described focus only on the options for reusing Buildings 1182-1188, which could mean that the purpose of the document is to find an appropriate use for these buildings. If that is the case, then the EA does not analyze an appropriate range of PTMP-consistent alternatives for this important location and set of buildings at a major entrance to this national park site at the Presidio.

Although needs for the project are listed (pg. 2) these appear to be objectives rather than needs. It is clear to us that the overarching need for this project is because Sports Basement's existing location is being examined for long-term use as a cultural and educational facility. The Trust fails to address this important element throughout the document.

Connected Action

The proposed action is closely related to the PTMP's decision (and ongoing public process) to have the commissary site retained for a cultural institution. Although not stated in the EA, this seems to be the driving need to move the Sports Basement. As such, the relocation of the Sports Basement is an interdependent part of the larger decision to convert the Commissary site for a cultural institution; and would not likely be contemplated at this time unless the commissary conversion was not a reasonably foreseeable action (40CFR1508.25). As a connected action, the conversion of the commissary site to a cultural institution and the relocation of Sports Basement should be analyzed in the same environmental analysis. Although we understand that the commissary site conversion is far from beginning the environmental compliance/decision process; because of their connectivity and the time frame in which the commissary conversion Federal Action will be decided, we believe the decision process for the Sports Basement is premature and should be analyzed at the same time as the commissary conversion. There is no compelling reason or need provided in the EA to relocate the Sports Basement at this time. When the environmental compliance/decision process for the commissary site is more imminent, it is our belief, because these two actions share similarities in timing and geography, their environmental consequences should be evaluated together (40CFR1508.25). By separating these connected actions into smaller pieces for impact assessment there is a chance that collectively they would have substantial and possibly significant impacts.

Proposed Action

The proposed action calls for up to 81,000 square feet (out of the programmed 93,000 sf) for retail use. This, in combination with future land use decisions suggested in the table Land Use Assumptions Used for the Transportation Analysis for the PTMP and Sports Basement, is a change from the Presidio Trust's

PTMP land use assumptions for Crissy Field (Area B). Yet it is not made clear what the effects of this change are, and whether the impacts are within the threshold of impact analysis presented in the PTMP FEIS. Reference is made to the Main Post Update EIS cumulative analysis, but the overall proposed changes to land use preferences for Crissy Field as suggested in this new table have not been included in a NEPA process with public involvement. The Presidio Trust should identify where the 100,000 sf of retail space is proposed throughout Crissy Field, as well as the other land use designations, and identify whether current use and occupancies at Crissy Field fit within these land use designations (p.63).

The proposed action includes 25,000 sf of exterior spaces which will be used for public amenities, gathering spaces and events. Some percentage of the 25,000 sf should be taken into account in the land use calculations because these spaces are being considered usable space (they will likely become attractions themselves and could add to length of stay for a certain percentage of visitors). The EA also does not make it clear as to how much square footage will be added to the existing structures. It would be helpful to clearly identify what currently exists and what is new square footage of space.

Alternatives

Since this long term use amends the PTMP proposed use for these building, an alternative should have been analyzed that included a mix of uses that are also financially viable such as a combination of smaller retail, warehouse and office use (similar to the most recent use). An alternative such as this would likely yield reduced impacts on traffic and visitor experience (compared to the two alternatives that were analyzed).

Environmental Consequences

We do not believe that the Trust adequately described the existing condition or reference point baseline condition for which Alternatives environmental effects are compared against. There should be a clear statement at the beginning of the Environmental Consequences section that describes all of the baseline conditions and data assumptions (i.e. methodology) that the Trust used to assess the anticipated level of impact for each impact topic.

The EA occasionally references the PTMP FEIS as describing the existing condition for impact assessment; however, the PTMP assumes the use of the commissary site is as a cultural institution and not as retail use. In addition to the PTMP FEIS the EA also occasionally uses the existing Sports Basement location as a baseline condition, which is not appropriate as this interim use was not analyzed in a NEPA document and as such the impacts of this use were never quantified or analyzed.

Visitor Use and Experience

NPS believes that the analysis of the potential impacts to Visitor Use and Experience is inadequate. The Trust fails to describe the existing/baseline conditions for which this impact topic is measured against. At one point this section references the existing Sports Basement location as the baseline condition; however, we believe this is not an appropriate baseline condition to use because it does not accurately represent the way in which the proposed location would be altered with this new use.

The visitor use and experience analysis provided is qualitative rather than quantitative. NPS would like to see further details to understand the number of visitors that would be anticipated coming to the site. We believe that the added traffic, congestion, competition for visitor parking in Area A, and the addition of a large retail space in this location would negatively impact the visitor experience at this more challenging and congested location.

In addition, the EA (p.18) states that Sports Basement requires a site more immediately adjacent to Crissy Field to "take advantage of the outdoor resources of Crissy Field that the store has incorporated into its public programming." We would like to better understand what this program would include in Area A to be sure that it is managed to be compatible and that signing and branding has minimal impact to the

arrival experience at this national park entrance.

NPS disagrees with the conclusion that "...the project area would not result in any noticeable change to recreational and visitor uses" (p. 20). We believe this is incorrect given that the most recent use at the east end of CF has been a relatively low-intensity warehouse/shop/office use and not a large-scale retail use.

Transportation

The transportation analysis is not adequate to provide understanding and disclosure of impacts or to provide appropriate mitigation to support a conclusion that the impacts would not be significant. It relies principally on outdated programmatic traffic analyses completed for the PTMP and PTMP Main Post Update (MPU), selectively uses readily available information, and does not provide an updated, project-specific analysis that would provide the detail needed to identify project impacts and appropriate mitigation. The following are the most critical deficiencies of concern to NPS in this transportation analysis section of the EA.

Use of PTMP and MPU for analysis

The lack of a project-specific traffic impact analysis does not allow an assessment of project impacts and adequate mitigation. While we concur that projects considered in a programmatic document can be cleared without project-specific analysis, this project is not consistent with the PTMP or MPU and conditions have changed significantly since these plans were completed. It is our understanding that the Sports Basement was approved as an interim use without environmental analysis or NEPA review. Current circulation and traffic conditions are significantly worse than forecast under PTMP/MPU evaluations. The EA states that traffic levels in the district will be "slightly reduced" with the project than what was forecast in the MPU. However, the MPU forecasted that the Doyle/Marina/Mason intersection would operate at LOS C in 2030. This intersection currently operates at LOS F. This would indicate that the changes to land use and building occupancy since the MPU (including the interim Sports Basement) have resulted in major transportation impacts in the area that have not yet been mitigated.

Access and Impacts

The EA does not specifically identify how patrons would access the site or how it would impact the transportation system or adjacent uses. Without a project-specific traffic impact analysis, an understanding of the trip assignment methodology is not possible. This is fundamental to identifying impacts and associated necessary mitigation measures. For example, the analysis states that the project will generate 270-300 peak-hour trips, but does not indicate how these trips are split between modes or what roads /intersections they are anticipated to use.

GGNRA has an intimate understanding of the area and its transportation issues. The location of the project site, in conjunction with new circulation patterns following the Presidio Parkway project, will very likely result in a majority of the trips using the new US 101/Girard ramps. However, there is no proposed left-turn channelization on Girard to allow east-bound traffic to directly access the project site and there is no left turn at the Doyle/Marina/Mason intersection to access Mason for east bound traffic. It is unclear whether it is assumed that the east-bound trips would use Girard/Lincoln/Halleck/Mason, though this would not likely be preferable due to impacts to Lincoln and Mason and their intersections. The most logical routing would be for east bound patrons to use US 101/Girard ramps modified to allow a left into the lots directly from Girard, thereby reducing impacts to Lincoln, Mason, or Marina, and relieving congestion at the Doyle/Marina/Mason intersection. This mitigation measure, in addition to others as appropriate, should be seriously considered to keep impacts less than significant, but for the nexus to be made the impacts must be quantified and documented through a detailed traffic analysis, including an intersection analysis. Access should also account for special event closure of Mason Street to ensure that existing uses can continue to be accommodated, including running events, and that during high visitor use periods, such as Fleet Week, safe visitor use can be accommodated.

Conclusions

The EA states that traffic congestion would not be substantially increased as a result of the project. However, it acknowledges the closest intersection to the site currently operates at LOS F and will not be significantly improved. These findings are in direct conflict with each other. As stated above, the interim Sports Basement location was not evaluated under NEPA, impacts were not disclosed, and mitigation was not implemented.

Mitigation

There are no transportation mitigation measures proposed for this project. The scale of this project, a large scale, auto-oriented retail development immediately adjacent to a major intersection and park entrance that currently operates at LOS F should strongly suggest impacts will occur and mitigation is necessary. The lack of analysis and quantification of impacts has resulted in no impacts being disclosed and no mitigation measures identified.

Parking

We understand why the Trust would encourage NPS to implement paid parking at East Beach if Sports Basement were to relocate to the proposed location; however, NPS has a specific process for considering implementing paid parking, and authorization for NPS to implement this as a mitigation measure cannot be assumed. Other mitigation, such as validated parking in the Sports Basement lot, and management of employee parking, should be included to avoid or minimize use of NPS Area A parking by Sports Basement patrons.

In addition, in order to improve visitor safety along Mason Street and further alleviate potential congestion along the road, elimination of parallel parking along Mason Street would be more effective than simply reducing the number of parallel parking spaces.

Light and Glare

It is not clear how the Trust would prevent fugitive light from the skylights and glassed enclosures. The NPS requests a preview of the "Trust's Standard Measures for Lighting". We would also like to reiterate our request to review the building and streetlight details once they are designed and asks that the Trust provide assurance that we will have that opportunity.

Cultural Resources

Based on the information provided in the EA, the NPS does not at this point concur with the finding of no adverse effect. It seems that it would be possible to meet functional needs with less impact to the historic fabric and character of the individual buildings and building group.

Specifically, NPS has concerns about impacts to the historic character and integrity of the buildings due to the amount of historic fabric proposed for removal, the proposed change in spatial character by creating a unified building out of separate warehouse buildings, the proposed continuous decking around all of the buildings, the "campsite" amenities, which are incompatible, the proposed large glass storefront entries that appear incompatible with the design, feeling, association and historic character of the warehouses.

Throughout the document there are statements about "providing a contiguous experience of a single retail entity within the seven buildings" and creating a "regularized series of connections." It is unclear why the warehouses need to be experienced as one large space, rather than a series of connected spaces. The spatial character of these buildings isn't continuous; it is repetitious.

While Sports Basement includes a community component that is an integral part of the Sports Basement philosophy/mission and it is not clear why the space that supports the community function needs to be physically connected or experienced as part of the retail spaces.

The cumulative impact statement is not clearly articulated, in particular the following statement from page

50 of the EA: "The contribution of the proposed action to cumulative actions, however, is not significant due to the low level of integrity associated with historic resources surrounding the project area." Rather, it would appear to us that if an area already has a low level of integrity, it would be that much more sensitive to additional change.

As expressed elsewhere in our comments, we would like to know if other alternatives were considered for rehabilitating the warehouses for the new use.

Cumulative Impacts

Retail use in the Crissy planning area would be five times that analyzed in PTMP. NPS would like to see more detail on the overall changes being proposed for Crissy Field and the associated impact analysis as it varies from the PTMP.

The proposed Sports Basement public programs are a positive contribution in that they bring visitors to the park but there is often spill over into other parts of the park that were not considered in cumulative analysis and should have been. NPS requests more information on the specific types of programs that would be hosted and how this affects traffic and visitor impacts around the east end of Crissy Field; details should include frequency of programs, length of program, hours of operation (nighttime or daytime), and number of participants.

Visitor Use and Experience, pg. 47 – we have a concern about the conclusion that "Nevertheless, some existing park visitors, such as bicyclists, joggers and dog walkers, may avoid this section of the park or experience a reduction in visitor satisfaction." While we appreciate the acknowledgement of this, given that this is a national park site and these user groups have been encouraged to enjoy Crissy Field and have done so for many years, the Presidio Trust should take every effort to avoid, reduce, and mitigate this potential impact. Monitoring to track the effects on visitors and additional mitigation measures that would be implemented if there is an adverse impact should be described in the EA.

Avoidance Measures

The proposed avoidance measures are insufficient and vague. The Trust needs to specify what the management actions would be that would reduce the impact. Throughout the document different terms are used to describe these measures (i.e. mitigation measures, management actions, etc.), common terminology should be used in order to make these actions clear and easy to understand. Based on the text provided on page 47, NPS is unsure if impacts on our land would be minimized.

General Comments

The Crissy Field Center is inaccurately called "Crissy Field Visitor Center (Building 1199)"; the correct title is "Crissy Field Center" (p. 19).

Reference is made to tables from the America's Cup EA but is not included in this EA and the tables are not readily available on the Presidio Trust's website (p. 20).

Many of the additional activities that make Sports Basement more than just a retail space involve the program activities that are not directly retail in nature. It is not clear whether the long term lease with Sports Basement will include the requirement to continue these activities, to assure that this important visitor serving component remains in the future including in the event that Sports Basement is sold to another business.

Attachment 5

RESPONSES TO COMMENTS RECEIVED ON SPORTS BASEMENT EA

RESPONSES TO COMMENTS RECEIVED ON SPORTS BASEMENT EA

A summary of public comments received on the Sports Basement Environmental Assessment with responses to the key issues and concerns raised are as follows:

Purpose and Need

Comment: Clearly state or define the purpose for the project (NPS).

Response: As was outlined in the draft EA (page 1), the purpose and need for the project is to establish a long-term location in the Presidio for the Sports Basement by placing it in Buildings 1182-1188. According to the Council on Environmental Quality (CEQ) regulations for implementing the NEPA, the federal agency need only “briefly specify the underlying purpose and need” to which the agency is responding.¹

Comment: Include a variety of other feasible alternatives in the range of alternatives (NPS).

Response: In addition to the proposed action of Buildings 1182-1188 being rehabilitated for the Sports Basement, the draft EA analyzed using these buildings for other purposes including visitor-oriented and office uses, which is the Presidio Trust Management Plan (PTMP) or “no action” alternative. The draft EA also discussed placing the Sports Basement at other alternative sites on the Presidio but these alternatives were not carried forward for further analysis for the reasons provided (draft EA, pages 17-18). An EA, in contrast to an EIS, need only include a brief discussion of alternatives.²

Comment: Change the needs listed for the project (page 2) to objectives (NPS).

¹ 40 CFR 1502.13.

² Center for Biological Diversity v. Salazar, 695 F.3d 893, 915 (9th Cir. 2012) (upholding agency analysis of only two alternatives – the proposed action and the no action alternative). See also Earth Island Institute v. U.S. Forest Service, 697 F.3d 1010 (9th Cir. 2012).

Response: In response to the comment, the text in the EA has been revised as follows:

The objectives of the project ~~is needed in order~~ are to:

Connected Action

Comment: The relocation of the Sports Basement is an interdependent part of the larger decision to convert the Commissary site for a cultural institution; and would not likely be contemplated at this time unless the commissary conversion was not a reasonably foreseeable action. Analyze the conversion of the commissary site to a cultural institution and the relocation of Sports Basement as a connected action in the same environmental analysis (NPS).

Response: Placing the Sports Basement at a new location is not a connected action because it has “independent utility.” As stated in the CEQ regulations, one example of how actions can be considered connected is if they are “interdependent parts of a larger action and depend on the larger action for their justification.”³ However, the relocation of the Sports Basement does not depend on a decision at the Commissary site for its justification. The Sports Basement can function at the new location with or without a new tenant at the Commissary site. Additionally, a new tenant can be located at the Commissary site without finding a long-term location for the Sports Basement. The Trust could simply not extend the Sports Basement lease. Further, the Sports Basement EA tiers from the PTMP EIS, which analyzed the impacts of having not only the Commissary site and Buildings 1182-1188 occupied but evaluated the impacts of all of the vacant buildings on Crissy Field (and other planning districts on the Presidio) being occupied.

³ 40 CFR 1508.25(a)(iii).

Proposed Action

Comment: Determine where the 100,000 square feet (sf) of retail space is proposed throughout Crissy Field, as well as the other land use designations, and whether current use and occupancies at Crissy Field fit within these land use designations (draft EA, page 63) (NPS).

Response: Specific building uses were not identified in the PTMP and no “caps” were placed on specific building uses within a planning district. Rather, the PTMP outlined planning concepts and planning guidelines for the seven planning districts (PTMP, page 59). For example, Crissy Field (Area B) was identified as a “Bayfront Recreation and Cultural Destination” with a future land use of “Mixed-Use/Visitor & Cultural Focus” (PTMP, pages 60-61). As further stated in the PTMP, these planning concepts are used as “an important guide for future planning and building use decisions” (PTMP, page 59). To assist in conducting an analysis of potential impacts as well as a comparison among alternatives, the PTMP EIS included a table of proposed building uses by planning district, which estimated square footage for different types of uses (PTMP EIS, Table 39, pages 270-272). The table on page 63 of the draft EA updated the PTMP EIS building use projections based on current uses, reasonably foreseeable future actions, and other estimated uses. As a result, the 100,000 sf for retail identified in the updated table included the retail space for Sports Basement and other cumulative projects. In response to the comment, a further breakdown of the 100,000 sf of retail is provided as follows:

Retail Space within the Crissy Field (Area B) District

Buildings	Square Feet^a (Retail)
1182-1188 (Sports Basement)	90,236
934 (Roaring Mouse)	3,064
935 (50 percent of ground floor)	3,430
937 (10 percent)	<u>1,820</u>
	98,550

^aU.S. Army gross square footage.

Comment: Take into account some percentage of the square feet of exterior spaces in the land use calculations because these spaces are being considered usable space (NPS).

Response: The Trust agrees. The exterior space, which may be used for community gatherings and events, is now taken into consideration in the land use calculations and impact analysis in the EA.

Comment: Identify what currently exists and what is new square footage of space (NPS).

Response: In response to the request, the sentence on page 4 of the draft EA has been revised for clarity:

Following the proposed alterations, there would be approximately 93,000 square feet (sf) of internal space, of which approximately 7,000 sf would be new construction for building connectors, and ~~25,000~~ 16,000 sf of existing and 6,500 sf of new elevated exterior decks.

Alternatives

Comment: Analyze an alternative that includes a mix of uses that are also financially viable such as a combination of smaller retail, warehouse and office use (NPS).

Response: This type of alternative was analyzed as the Cultural and Education Center/Offices (PTMP alternative). Under this alternative, the complex of rehabilitated buildings would be used for multiple purposes, including visitor-oriented and office uses (draft EA, page 14).

Comment: Analyze an alternative that considers Stillwell Hall at the opposite end of Crissy Field, as it would not increase congestion at the Mason Street entrance (Crissy Field Dog Group).

Response: The Trust considered other locations for the Sports Basement (draft EA, pages 17-18) but dismissed them from further analysis for several reasons including inadequate square footage and adverse effects to historic resources. Both these rationale would also apply to Stillwell Hall as it contains less than 45,000 square feet and rehabilitating this former enlisted barracks to serve a retail function would result in adverse impacts to the historic property.

Environmental Consequences

Comment: Describe the existing condition or reference point baseline condition for which the alternatives' environmental effects are compared against (NPS).

Response: In all instances in the Environmental Consequences section, the baseline consisted of the pre-project environmental conditions, which was described on page 1 of the draft EA as seven currently vacant warehouses located on Mason Street near the Marina Gate (existing condition). The existing condition also took into account the current environmental effects of the existing Sports Basement, which has been operating at the Commissary as a sporting goods store since 2003.⁴ For each resource evaluated, the draft EA compared the impacts of the Sports Basement at the Mason Street warehouses (proposed action) to existing standards and thresholds of significance (as stated as questions following the description of the affected environment) and to a cultural and education center and offices at the

⁴ The existing Sports Basement at the Commissary was previously analyzed in a NEPA document for a categorical exclusion pursuant to Section 1010.1(a) of the Trust's Regulations implementing the NEPA. The Presidio Trust Project Screening Form for Building 610 – Sporting Goods Retail, CR 03-056, dated January 31, 2003 provided details about the action's environmental effects. Specifically, the transportation and parking analysis found that "displacing cultural/education space in Building 610 with a sports retail store would result in fewer morning (AM) peak hour vehicle trips and an estimated sixteen additional evening (PM) peak hour vehicle trips, and would create demand for approximately eleven fewer parking spaces on weekdays. The vehicle trip generation and parking demand associated with a sports retail store would be comparable to that for cultural/education space. Any additional traffic or increased parking demand that would result from a sports retail store displacing 92,722 square feet of cultural/education space in Building 610 is not expected to result in additional significant traffic or parking impacts beyond those identified in the PTMP."

warehouses location (no action) per the PTMP. Both the proposed action and no action assumed a cultural institution at the Commissary site location at a future date per the PTMP.

Visitor Use and Experience

Comment: Analyze the proposed location and not the existing Sports Basement location as the baseline condition for which to measure impacts (NPS).

Response: In the draft EA's focus of the impact of the project on the visitor experience to East Beach, which was believed to be of most interest to the NPS, the Trust overlooked describing the baseline condition for the Mason Street warehouses. In response to the comment, the discussion of the visitor experience of the proposed Sports Basement location in the EA has been amended to begin as follows:

The current relevance of the Mason Street warehouses to most visitors as they enter the highly accessible Mason Street Gate may be characterized as non-existent to very low. The warehouses are hardly noticeable due to their modest scale and vacancy, and despite the buildings' historic significance, their relationship to the park is not readily apparent. Their unwelcoming condition conveys limited attractiveness to passers-by travelling to more interior destinations within the park. The lack of visitor facilities is in stark contrast to the educational and recreational stewardship opportunities that abound within the landscaped and restored natural coastal environment of the East Beach portion of Crissy Field (Area A) north of Mason Street.

Comment: Provide additional details to understand the number of visitors that would be anticipated to come to the project area (NPS).

Response: Based on traffic, sales and survey data provided by Sports Basement and Presidio Trust observations of the current sporting goods store, during the peak period of the day, as many as 777 (weekday, 5-6 pm) and 1,171 (weekend, 2-3 pm) people would be entering or

leaving the store for shopping or community events (see table below). Sports Basement would typically host 4 programs (1 in the daytime; 3 in the evening) per day lasting 1 to 5 hours each. Programs would attract between 10 and 100 participants but this would vary widely depending upon the event. No events would be held outside the building premises. Additional details on Sports Basement community engagement and visitor opportunities are provided in Attachment 2 of the EA.

The Trust estimates that of the 704 to 1,171 people entering or leaving the store during the peak hour, 35 to 59 would also be visiting recreational activities in the area, including East Beach. According to Sports Basement, bike riding (on rented bikes) to Golden Gate Bridge along the Mason Street bike path and kite flying on Crissy Airfield are among the more popular activities of Sports Basement patrons.

Sports Basement Visitors

	Weekday Peak Hour (5-6 pm)	Weekend Peak Hour (2-3 pm)
Square Feet	93,000	93,000
Rate (vehicle trips/thousand gross sf)	2.9-3.2	4.9-5.5
Vehicle Trips (one-way)	270-298	456-512
Persons per Vehicle ^a	1.854	1.854
Person Trips by Vehicle (one-way)	500-552	845-948
Person Traveling by Vehicle ^b (%)	71	81
Total Person Trips (all modes, one-way)	704-777	1,043-1,171
Percentage of Patrons at Crissy Field (Area A) (%)	2-5	2-5
Person Trips to/from Crissy Field (Area A)	35-39	52-59

^aCity and County of San Francisco, San Francisco Planning Department, 2002.

^bTKJM Transportation Consultants, 2011.

In response to the request, the analysis of visitor experience impacts in the Environmental Consequences section of the EA has been supplemented with the additional information.

Comment: Clarify whether Sports Basement requires a site more immediately adjacent to Crissy Field to “take advantage of the outdoor resources of Crissy Field that the store has incorporated into its public programming” (p. 17) (NPS).

Response: The larger discussion in the draft EA gave reasons as to why more interior areas of the Presidio were rejected for siting Sports Basement. Sports Basement only prefers to be on Crissy Field; it is not a requirement of the applicant or the Trust.

Comment: Ascertain that signing would have minimal impact to the arrival experience at the national park entrance (NPS).

Response: The Trust is responsible for managing Area B in a way that preserves its historic and visual character. We fulfill that responsibility in part by instituting standards regarding the appearance and placement of signs. Sports Basement would not be allowed to design and install its own signs. Rather, the Trust would design, construct, install and maintain the signs consistent with its draft Guidelines for Non Residential Exterior Tenant Signs (Trust 2013b). Sign placement would be determined so as to minimize intrusion on the cultural landscape. The design of the signs would be simple and unassuming; their size would be regulated to ensure visual uniformity. The signs would not provide advertising but would simply convey information and improve wayfinding. Application of the sign guidelines would satisfy the needs of the tenant and visitors while preventing visual discord and clutter. Signage design for Sports Basement would be subject to additional NEPA/NHPA (N²) review, at which time NPS would be given the opportunity to participate and comment. In response to the comment, a new mitigation measure has been added to the EA to ensure that signage is consistent with Trust guidelines and would minimize intrusion on the visual landscape.

Comment: Support the conclusion that “...the project area would not result in any noticeable change to recreational and visitor uses” (page 20) (NPS).

Response: The discussion in the EA has been revised to acknowledge the change in visitor use that would occur at the Mason Street warehouses. However, proposed activities at Sports Basement would have little effect on East Beach goers.

Comment: Evaluate the impacts of special events on East Beach (Crissy Field Dog Group).

Response: In response to the comment, new information on special events is provided in the discussion on visitor experience in the Environmental Consequences section of the EA. The analysis concludes that because special events at East Beach do not unreasonably interfere with traffic, visitor access to parklands or facilities, or visitor activities, and are not granted exclusive use of the area, the impact is considered minor.

Comment: Note that Sports Basement rents out bikes for tourists at Crissy Field. Re-evaluate and perhaps restrict bicycle use to the outer perimeter of Crissy Field as bicycle use is the number one safety hazard in the area (Crissy Field Dog Group).

Response: Since Crissy Field north of Mason Street is beyond the Trust’s jurisdiction, we have forwarded the comment to the NPS for consideration. Nonetheless, bicycling along the Crissy Field waterfront is a popular activity. According to visitor counts taken for the 34th America’s Cup Races EA, approximately 1,200 bicyclists use the promenade on a typical weekend day. Visitor incidents with bicyclists occur on Crissy Field trails because dog walkers and other visitors share this space with bicyclists. However, a comparison of NPS visitation estimates and bike- and dog-related violation reports at Crissy Field for the years 2008-2011 indicate that, despite bicyclists comprising 21 percent of total visitor activities compared to 6 percent for dog walkers, the greatest threat to health and safety of park visitors at Crissy Field is encounters with unruly/aggressive dog, with incidents related to dog violations eclipsing incidents reported for bicycle violations and accidents (see table below). Visitor safety

incidents related to dogs included intimidation, dogs attacking bicyclists, dogs knocking over people, dogs biting people, and people injured while fleeing from threatening dogs. Bicycle-related violations included biking at night without lights.

Dog- and Bicycle-Related Violations at Crissy Field (Area A)

Dog-Related Incidents^a	Year				Total
	2008	2009	2010	2011	
Violation of Leash Restrictions	65	158	27	33	283
Violation of Closed Area	58	00	00	0	58
Off-leash Violation	44	6	5	10	65
Possessing Pet in Closed Area	13	2	0	0	15
Hazardous Condition	2	5	5	5	17
Pet Excrement	0	2	0	1	3
Wildlife Disturbance	0	1	0	1	2
Unattended Pet	0	0	0	1	1
Other	9	25	7	25	66
Total	191	199	44	76	510
Bicycle-Related Incidents^a					
Violation	1	2	1	4	8
Accident	2	3	2	1	8
Total	3	5	3	5	16

^a GGNRA Law Enforcement Incident Database, Years 2008-2011.

Comment: Reconcile the conclusions in the Visitor Use and Experience and the Parking and Cumulative Impact sections (Crissy Field Dog Group).

Response: In response to the comment, the following change has been made to the text on page 20 of the Visitor Use and Experience section of the draft EA to resolve the inconsistencies among the various sections:

With Presidio-wide parking management in place (see PTMP Mitigation Measure TR-21),
individual users and groups that utilize the East Beach would continue to be able to use the area without interruption.

The Trust thanks the Crissy Field Dog Group for its careful review of the document.

Transportation

Comment: Provide a project-specific traffic impact analysis to allow an assessment of project impacts and adequate mitigation, as the project is not consistent with the PTMP or MPU and conditions have changed significantly since the plans were completed (NPS, Neighborhood Associations for Presidio Planning).

Response: Because Sports Basement currently occupies a building of similar size in the same district within the park, current traffic conditions reflect the project's presence in the park. The EA compares the trips generated by Sports Basement in the Mason Street warehouses with trips generated by 40,000sf of cultural/educational use and 53,000sf of office use as evaluated in the PTMP EIS. The MPU EIS is dated November 2010, and the transportation analysis made the most conservative land use assumptions for the Crissy Field (Area B) district based on the best available information at the time, including recreational uses in Buildings 924, 926 and 933 at West Crissy, and retail use in Building 610 (reflecting Sports Basement's existing occupancy of the building). For the purpose of the EA analysis, land use information was further updated to reflect a museum use in Building 610, University of San Francisco in

Building 920, Roaring Mouse bike shop in Building 934, office in Buildings 681, 682 and 683, and future warehouse use in Building 643. Since publication of the Sports Basement EA in October 2013, the analysis has been further updated to reflect an aquatic and fitness center in Buildings 935 and 937 at the west end of Crissy Field. The forecast district-wide vehicle trip generation estimates under buildout (2030) conditions with the proposed action have been updated accordingly from 1,123 to 1,151 vehicle trips, but is still slightly less than the number of district-trips evaluated in the MPU EIS in year 2030.

Although traffic volumes in the Crissy Field area have increased in recent years, volumes are still less than forecast under PTMP/MPU evaluations. See the table below for counted and forecasted traffic volumes through the Marina Gate. The counts collected in September 2014 are the best, most recent traffic count data, and were collected during the closure of Halleck Street. The 2011 counts were collected when Halleck Street was open, but Lincoln Boulevard near the Cemetery was closed. The recent 2014 and 2011 counts indicate weekday traffic volumes in the weekday PM peak hour have increased over the years, but are less than the future forecast volumes in the GMPA EIS, PTMP EIS and MPU EIS.

Traffic circulation patterns in the Presidio were substantially altered with the closure of Halleck Street for the Presidio Parkway project in April 2012, however the peak hour volumes through the Marina Gate have not changed significantly. At the conclusion of the Presidio Parkway project, Halleck Street will reopen, and motorists will also be able to travel between Marina Boulevard and the Main Post without going through the Marina Gate. Although occupancy of remaining vacant buildings in Crissy Field will increase traffic volumes on Mason Street and through the Marina Gate, the direct connection between Marina Boulevard and Girard Avenue is expected to reduce the amount of traffic through the Marina Gate. Mason Street and the Marina Gate also carry a considerable volume of traffic simply passing through the Presidio.⁵

⁵ A March 2009 license plate survey indicates 35 to 40 percent of the traffic entering the Marina Gate is passing through the Presidio and exiting other gates.

The impact of pass-through traffic on Presidio roadways may also be reduced with the reopening of the US 101/Veterans' Boulevard ramps at the completion of the Presidio Parkway project. Per the Presidio Trails and Bikeways Master Plan, the Trust also plans to close the one-way portion of Crissy Field Avenue to vehicular traffic and reuse the roadway as a multi-use trail. This change in the roadway network will increase the travel time for pass-through traffic traveling between the Marina Gate and the Golden Gate Bridge, and may reduce the volume of pass-through traffic through the Marina Gate and on Mason Street.

With the 2011 traffic counts and the signal timing in place at that time, the intersection operated at LOS C in the weekday PM peak hour and LOS D in the weekend peak hour.⁶ With the signal timing changes made in May 2014 and using the same 2011 traffic counts, the intersection operates at LOS C in the weekday PM peak hour and LOS C in the weekend peak hour. With the September 2014 counts, the intersection continues to operate at LOS C in both the weekday PM peak hour and the Saturday peak hour. The MPU EIS forecast the intersection of Marina/Mason/Lyon to operate at LOS C in 2030 in the weekday PM peak hour. Using the recently modified signal phasing and cycle time, the intersection is expected to operate at LOS D in the weekday peak hour in 2030, although the signal timing will likely need to be modified again in the future to balance the increase in volumes on Marina Boulevard with the increase in volumes on Mason Street. In response to the comment, the analysis of transportation conditions in the Environmental Consequences section of the EA has been supplemented with additional information.

⁶ The Sports Basement EA published in October 2013 cited the intersection as operating at LOS F in the weekend peak hour as erroneously identified in Table TRA-1 of the 34th America's Cup Races EA. At the time of the publication of the 34th America's Cup Races EA, the intersection operated at LOS D in the weekend peak hour, as correctly noted in later tables in the 34th America's Cup Races EA.

Marina Gate Volumes

Historic Counts	Weekday AM Peak Hour	Weekday PM Peak Hour	Weekday Daily	Weekend Midday Peak Hour	Weekend Daily
July 1991 ^a		480	4,690	650	4,635
July 1996 ^a		422	4,374	628	4,857
May 1998 ^b		509	5,313	675	6,821
June 1998 ^b		57	6,095	961	8,514
November 1998 ^b		412	4,251	427	3,928
May 2000 ^c	423	442			
October 2005 ^d	293	539			
January 2008 ^d	293	507			
March 2009 ^d	178	688	7,213	981	9,007
May 2009 ^d				1,306	
September 2009 ^d	343	683	7,190	977	9,040
April 2011 ^e	458	669			
September 2011 ^f		784		905	
September 2014	409	708		941	
Projections					
GMPA Existing Conditions (1998) ^g		610	5,22		5,100
GMPA Alt. A with Doyle (2000) ^g		810	8,250		8,010
GMPA Alt. A with Doyle (2010) ^g		970	9,700		9,400
Presidio Parkway (2015) ^e	480	700			
PTMP (2020) ^h		818			
Main Post Update (2030) ⁱ	568	880			
Presidio Parkway (2055) ^e	560	800			

^aRobert Peccia & Associates, Inc., 1996.

^bRobert Peccia & Associates, Inc. 1999.

^cSan Francisco County Transportation Authority, 2008.

^dPresidio Trust Traffic Counts.

^eFehr & Peers, 2011.

^fAdavant Consulting and LCW Consulting, 2012.

^gRobert Peccia & Associates, Inc., 1994.

^hWilbur Smith Associates, 2002.

ⁱPresidio Trust, 2010.

Comment: Provide the trip assignment methodology to identify how patrons would access the site or how the project would affect the transportation system or adjacent uses (NPS).

Response: Trips to and from the Sports Basement were assumed to be geographically distributed to the four superdistricts of San Francisco, North Bay, East Bay and South Bay, per the San Francisco Guidelines for Environmental Review, which provides trip distribution patterns for a retail use located in Superdistrict 2 (northwest quadrant of San Francisco). Over half of the trips would be to and from other parts of Superdistrict 2, which includes the Marina, Cow Hollow, Pacific Heights, and inner and outer Richmond neighborhoods. Over 80 percent of trips are expected to be to/from other parts of San Francisco. The assumed trip distribution is shown in the table below.

Origin	Distribution (%)
Superdistrict 1	11.9
Superdistrict 2	54.2
Superdistrict 3	8.3
Superdistrict 4	7.3
East Bay	3.2
North Bay	2.2
South Bay	5.2
Other	<u>7.7</u>
	100.0

City and County of San Francisco, San Francisco Planning Department, 2002.

Based on this geographic distribution of trips, inbound and outbound weekday PM peak hour and weekend peak hour trips were assigned to the surrounding roadway network. Many inbound motorists would likely use the same routes as used today, although those approaching from Marina Boulevard would have the option to continue to Girard Road from Marina Boulevard and enter the parking lot directly from Girard. Outbound motorists would have the option of exiting directly to Girard Road to northbound or southbound US101.

	Inbound (%)	Outbound (%)
Marina Boulevard (east of gate)	28	20
Halleck Street	57	14
Girard Road (west of project site driveway)	0	55
Mason Street (west of Halleck Street)	15	12

Comment: Provide an intersection analysis to determine whether left-turn channelization on Girard to allow east-bound traffic to directly access the project site and a left turn at the Doyle/Marina/Mason intersection to access Mason for east bound traffic or other appropriate mitigation are warranted (NPS, two individuals).

Response: Based on the assumed trip distribution in the table above, vehicle trips were assigned to various routes to and from the warehouse buildings. Because the majority of trips would be to/from nearby neighborhoods in Superdistrict 2, many motorists would likely use gates on the south side of the Presidio, Marina Gate/Girard Avenue, or Lombard as the US101 on- and off-ramps. Routes to Sports Basement would be as likely to use Halleck Street or McDowell Avenue to Mason Street. As noted above, the intersection currently operates at LOS C both in the weekday PM peak hour and the weekend peak hour with the recent signal timing changes. Inbound access to Sports Basement from the US101 NB off-ramp would be circuitous, but there are several alternative routes to the site from this direction, using many of the same routes as today. Inbound access to Sports Basement from the US101 SB off-ramp would also be circuitous, but given the geographic distribution of trips and availability of alternative routes, a relatively small number of motorists would likely use this route. While a left turn pocket from Girard into the site would be convenient for motorists traveling to the site from the US 101 off-ramps, this movement would conflict with the heavy through movement from westbound Girard to the northbound US 101 on-ramp.

Comment: Account for special event closure of Mason Street, including running events, to accommodate access for existing uses, and safe visitor use during high visitor use periods, such as Fleet Week (NPS).

Response: Secondary access to the parking lot via Girard Road would minimize the effect of such special events on the Mason Street warehouses tenant. Patrons would be able to enter and exit the parking lot directly from westbound Girard Road, allowing the driveway on Mason Street to be closed if needed. The majority of special events (e.g., triathlons, marathons, charity walks/runs) occur early on Sunday mornings, which minimizes the impact on other Presidio visitors, tenants and residents. Sports Basement's current location is on Mason Street and therefore the tenant understands the implications of special events in the area. Special event accommodation would also be addressed in the lease agreement.

Comment: The interim Sports Basement location was not evaluated under NEPA, impacts were not disclosed, and mitigation was not implemented (NPS).

Response: The existing Sports Basement at the Commissary was previously analyzed in a NEPA document for a categorical exclusion pursuant to Section 1010.1(a) of the Trust's Regulations implementing the NEPA. The Presidio Trust Project Screening Form for Building 610 – Sporting Goods Retail, CR 03-056, dated January 31, 2003, which was made available to the NPS for review, provided details about the sports retail store's environmental effects. Specifically, the transportation and parking analysis found that "displacing cultural/education space in Building 610 with a sports retail store would result in fewer morning (AM) peak hour vehicle trips and an estimated sixteen additional evening (PM) peak hour vehicle trips, and would create demand for approximately eleven fewer parking spaces on weekdays. The vehicle trip generation and parking demand associated with a sports retail store would be comparable to that for cultural/education space. Any additional traffic or increased parking demand that would result from a sports retail store displacing 92,722 square feet of

cultural/education space in Building 610 is not expected to result in additional significant traffic or parking impacts beyond those identified in the PTMP.”

Comment: Resolve the conclusion that traffic congestion would not be substantially increased as a result of the project with the EA’s acknowledgement that the closest intersection to the project area currently operates at LOS F and would not be significantly improved (NPS).

Response: The Sports Basement EA published in September 2013 cited the intersection delay and levels of service described in the Affected Environment section of the 34th America’s Cup Races EA, which were erroneous. The Environmental Consequences section of the 34th America’s Cup Races EA (Tables TRA-30A and TRA-30B) correctly identifies the intersection delay and levels of service as LOS C and D in the weekday PM peak hour and weekend peak hour, respectively. In May 2014, the San Francisco MTA modified the signal timing of this intersection, which improved the weekend peak level of service from LOS D to LOS C. The Saturday peak hour volume through the Marina Gate has increased four percent between September 2011 and September 2014, however the intersection continues to operate at LOS C.

Sports Basement currently occupies a building of approximately the same size approximately ½ mile to the west, so the traffic impacts associated with the proposed land use are already reflected in existing conditions. Relocation of Sports Basement to a site of similar size farther east on Mason Street is not expected to substantially increase current level of congestion at the Marina/Mason/Lyon intersection. Sports Basement’s retail use was also included in the analysis of future conditions in the Main Post Update EIS. Various land use assumptions for buildings in the district were updated for the purpose of this analysis. The combination of those changes results in a slight reduction in peak hour vehicle trips generated by the district compared to the Main Post Update EIS. Therefore, the Main Post Update EIS analysis accurately reflects the cumulative impact of Sports Basement and other uses in the district.

Comment: Identify transportation mitigation measures given the scale of the project and its adjacency to a major intersection and park entrance that currently operates at LOS F (NPS).

Response: The SFMTA implemented signal timing changes at the signalized intersection of the Marina Gate in May 2014. The SFMTA lengthened the total cycle time, changed the signal phasing, lengthened the phase for the Mason Street approach and actuated both the Mason Street approach and northbound approach from the Palace of Fine Arts, allowing the length of the phase to adjust to variable traffic volumes on those approaches. The changes improved the operation of the intersection, and it currently operates at LOS C in both the Saturday peak hour and the weekday PM peak commute hour. Since the intersection currently operates at an acceptable level of service (LOS D or better), and no further mitigation is required. As regional and local traffic patterns change in future years, the signal timing for this intersection will likely need to be revisited.

Parking

Comment: Include other mitigation than Area A paid parking, such as validated parking in the Sports Basement lot, and management of employee parking, to avoid or minimize use of NPS Area A parking by Sports Basement patrons, as authorization for NPS to implement paid parking as a mitigation measure cannot be assumed (NPS, Crissy Field Dog Group, and several individuals).

Response: It has not been demonstrated that Sports Basement would result in any significant impacts to parking conditions. There would be an adequate parking supply on-site to serve the demand generated by the proposed project. The obligation to implement PTMP Mitigation Measure TR-21 *Presidio-Wide Parking Management* at East Beach rests with the NPS and not the Trust. The NPS is familiar with the full spectrum of parking regulations in lieu of parking fees that can be successful at East Beach including time limits, which are also identified under the measure. Time limits would likely be an effective tool to prevent spillover from Sports

Basement employees, but may be less effective in reducing spillover effects from Sports Basement patrons. The Trust encourages NPS to begin the process for implementing parking management strategies at East Beach. The Trust can and will reinforce Area A parking management strategies with strategies in Area B.

The Trust feels most Sports Basement patrons, who are in the store for a relatively short period of time, are unlikely to park at East Beach (a 4-minute minimum round-trip walk) to avoid a minimal parking fee (currently \$1.20/hour). To discourage Sports Basement employees from parking in Area A, the Trust would require as part of the lease agreement a TDM commitment from the tenant to encourage Sports Basement employees to use alternative modes (e.g. Commuter checks for transit or bicycles). The Trust would also prohibit Sports Basement employees from parking in East Beach through the lease agreement. Should Sports Basement employees be discovered parking in Area A, the Trust will contemplate triggering a commuter benefit whereby Sports Basement would pay for its employees' parking or transit pass. The Trust is also considering making the parking fees in the Palace of Fine Arts parking lot lower than fees in the parking lot closer to buildings, giving Sports Basement employees a financial incentive to park in the more remote Palace of Fine Arts lot. Implementation of time restrictions at East Beach would both support the lease term and also encourage turnover for East Beach users.

Comment: Eliminate parallel parking along Mason Street rather than reducing the number of parallel parking spaces in order to improve visitor safety along Mason Street and further alleviate potential congestion along the road (NPS).

Response: The Trust intends to strike a balance between providing enough parking to meet the demand generated by the proposed project and other nearby uses in Area B. A small number of parallel parking spaces would not significantly negatively affect visitor safety or cause significant congestion. The proposed project would provide a sidewalk on the south side of Mason Street. The provision of a sidewalk, combined with the striped Class II bicycle

lane and closure of the small parking lot east of Building 1188 would address pedestrian safety in the area.

Cultural Resources

Comment: Substantiate the finding of no adverse effect as it seems that it would be possible to meet functional needs with less impact to the historic fabric and character of the individual buildings and building group (NPS).

Response: In consultation with the NPS and SHPO, the project was modified to respond to the comments as follows:

- The amount of wall proposed for removal to create the north/south connections between Buildings 1184/5, 1183/6 and 1182/7 was reduced from 53 percent removal to 34 percent removal (or, from 9 of 17 bays per building pair to 7 of 17 bays) through the retention of two bays per building pair and incorporation of a header detail. This change also helped to reduce the change in spatial character among the warehouses, by retaining more of the historic separation between individual buildings than originally proposed.
- Campsite amenities were removed from the project.
- Additional architectural detailing and studies were developed to address the relationship between the continuous decking and the existing exterior cladding, and the new glazed storefront entries.

Other changes to the project made in response to concerns about the alteration to character-defining features of the buildings included:

- Removal of the skylight on 1184 (the most steeply pitched, thus visible of the seven building roofs).
- Removal of a proposed new deck extension on the west elevation of 1184/1185 and replacement with an at-grade plaza.

- Incorporation of a bi-fold door to obscure a new glazed opening at the west end of 1185 during non-business hours.

Comment: Clarify why the warehouses need to be experienced as one large space, rather than a series of connected spaces (NPS).

Response: Sports Basement requires efficient, user-friendly circulation and egress routes and universal access to provide a contiguous experience of a single retail entity within the seven buildings. Throughout the design process, the tenant's requirements were balanced with retaining the buildings' historic character as seven structures designed to work together, but with minimal physical connections. The final design removes 34 percent of the connecting walls between the north/south pairs of buildings, along with additional exterior fabric to create the east/west connections. The amount is much less than originally proposed based on consultation with the NPS and SHPO.

Comment: Explain why the space that supports the community function needs to be physically connected or experienced as part of the retail spaces (NPS).

Response: Incorporating the community component into the existing complex of buildings (inside Building 1184) supports the Trust's leasing, land use and historic preservation goals twofold: maximizing the use of existing historic buildings to support tenant activities, and minimizing the amount of new construction needed to support such activities.

Comment: The EA states that "the contribution of the proposed action to cumulative actions... is not significant due to the low level of integrity associated with historic resources surrounding the project area" (page 50). Suggest that if an area already has a low level of integrity, it would be that much more sensitive to additional change (NPS).

Response: The cumulative effects analysis of the EA has been updated to reflect the revised determination of “adverse effect” for the project. Impacts to cultural resources, while adverse under the proposed action, do not rise to the level of a significant impact as they are localized and do not result in the delisting of the adversely affected contributing buildings from the NHLD.

Comment: Consider other approaches for rehabilitating the warehouses for the new use (NPS).

Response: Over the course of consultation, the Trust and Sports Basement teams developed several different designs for the original proposal. The intent was to respond to NPS and SHPO comments to reduce impacts to historic resources, including: reduction of interior wall removal; elimination of a skylight, the western deck expansion and outdoor amenities (fire pits); and incorporation of a bi-fold door to obscure a new glazed opening on the west elevation of Building 1185.

Light and Glare

Comment: Prevent fugitive light from the skylights and glassed enclosures (NPS).

Response: As discussed under Light and Glare in the Environmental Consequences section of the EA, minimal-impact lighting techniques would be used to avoid light trespass, both upward and laterally. Only the minimum amount of light would be used, and light would be directed downward to the area of need.

Comment: Provide the “Trust’s Standard Measures for Lighting” and the building and streetlight details once they are designed (NPS).

Response: As previously indicated to the NPS, the requested items would be subject to additional NEPA/NHPA (N²) review, at which time the NPS would be given the opportunity to participate and comment.

Cumulative Impacts

Comment: The EA concludes that “Nevertheless, some existing park visitors, such as bicyclists, joggers and dog walkers, may avoid this section of the park or experience a reduction in visitor satisfaction.” Mitigate and monitor this potential impact (NPS).

Response: The conclusion is based on an evaluation of future cumulative projects with extensive programming (such as a cultural institution at the Commissary site and the permanent Crissy Field Center at East Beach) that would attract new visitors in significant numbers to Crissy Field. As demonstrated in the EA, Sports Basement’s contribution to cumulative impacts on the visitor experience would be negligible. Those measures already in place as identified in the 34th America’s Cup Races EA and the PTMP EIS would minimize potential cumulative impacts. The Trust is committed to imposing additional management controls and monitoring visitation levels when necessary to ensure that park uses are protected. However, even with measures in place to reduce effects to visitor use as much as feasible, there will still be those that would seek to enjoy less crowded areas of the park as noted in the EA. This is a residual cumulative impact that was previously disclosed in the PTMP EIS⁷ and was considered “minor” in the 34th America’s Cup Races EA requiring no additional mitigation.⁸

Comment: Better analyze cumulative impacts to visitors to Crissy Field and to other people traveling in the City of San Francisco along Marina Boulevard (Crissy Field Dog Group).

⁷ “Based upon visitation patterns in the Presidio, peak visitor use would occur primarily on weekend days and holidays with good weather. On these days, visitors desiring solitude or a more contemplative experience would need to seek these experiences in less developed areas of the park” (PTMP EIS, Volume I, Impacts on Visitor Experience, Final Plan Alternative, page 293).

⁸ 34th America’s Cup EA, Visitor Use and Experience, Section 4.7.8.14 Conclusion, page 4.7-52.

Response: Impacts to visitor use and experience (page 47 of draft EA) as well as transportation (page 48 of draft EA) were analyzed in the Cumulative Impacts section on pages 47-48 of the draft EA. As stated and further substantiated in the EA, the Sports Basement occupancy of Buildings 1182-1188 combined with other reasonably foreseeable future actions would only result in minor changes in the number of trips generated by the Crissy Field district when compared to what was analyzed in the Main Post Update EIS and these minor changes would not significantly affect the operation of nearby intersections.

Environmental Justice

Comment: Analyze environmental justice impacts of parking fees (Crissy Field Dog Group).

Response: Federal agencies must make achieving environmental justice part of their mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority populations and low-income populations in the United States.⁹ Through the implementation of its environmental programs, the Trust has always been guided by this mandate. As stated by the U.S. EPA:

Environmental Justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. EPA has this goal for all communities and persons across this Nation. It will be achieved when everyone enjoys the same degree of protection from environmental and health hazards and equal access to the decision-making process to have a healthy environment in which to live, learn, and work.¹⁰

⁹ Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations; <http://www.archives.gov/federal-register/executive-orders/pdf/12898.pdf>.

¹⁰ <http://www.epa.gov/compliance/ej/>.

Rather than creating an environmental or health hazard, implementing parking fees to discourage automobile use results in an environmental benefit when visitors choose transportation alternatives. The Trust seeks to improve access to the park by encouraging transportation alternatives such as transit, ridesharing, cycling and walking, and by fee parking. The implementation of parking fees is but one important tool outlined in the Trust's long-standing, comprehensive Transportation Demand Management (TDM) Program that was approved as part of the PTMP. Parking fees also partially fund the operation of PresidiGo, a free public-serving shuttle service.¹¹ PresidiGo service is available for free to all visitors, including those who cannot afford to own a car and those without a driver's license. Fee parking is also highlighted in the NPS' general management plans for the Presidio and other sites in the GGNRA, and is being employed or considered in many other areas of the park, including the west end of Crissy Field (Areas A and B). Both the NPS and the Trust will continue to explore a full range of management tools to offset congestion at Crissy Field. Any equity impacts can and are being addressed through expanding the Presidio's free shuttle to underserved neighborhoods (as was done on a pilot basis late last year), charging the minimum parking fees necessary to accomplish TDM goals, allowing free parking during certain periods, and seeking public input. At the same time, it is important to create awareness among the public about the problem of congestion and its effects on health, park resources, and the visitor experience.

¹¹ PresidiGo operates two routes within the Presidio that are always open to the public and free. PresidiGo service to downtown San Francisco is open to the public midday, on weekends and on select runs during the peak commute periods. PresidiGo downtown service is available to MUNI visitor pass (MUNI Passport) holders at all times.

General Comments

Comment: Based on the text provided on page 47 of the draft EA, it is uncertain whether impacts on Area A would be minimized. Use common terminology in describing measures (i.e. mitigation measures, management actions, etc.) that would be used to reduce impacts (NPS).

Response: The Trust is precise in its use of NEPA terminology regarding mitigation measures. The management and protection measures alluded to in the EA text were referenced (draft EA, Footnote 6, page 20) and apply to management and protection measures (note same terminology) identified in an NPS NEPA document. As noted on page 88 of the draft EA, “all *mitigation measures* [emphasis added] identified in the EA that were included as part of the proposed action to avoid or minimize environmental impacts that could result” were listed on pages 88 through 90 of the draft EA.

Comment: Provide a stipulation in the lease for Sports Basement to continue program activities that are not directly retail in nature to assure that the visitor serving component remains in the event that the business is sold (NPS).

Response: This requirement would be almost impossible to enforce. However, the Trust shares the NPS’ concern and would carefully screen new tenants to ensure consistency with PTMP planning principles and objectives.

Comment: Provide direct links to the Presidio Trust Management Plan EIS and the 34th America's Cup Races EA (NPS, Crissy Field Dog Group).

Response: Both documents can be readily found on the agency websites at <http://www.presidio.gov/about/Pages/Presidio-Trust-Management-Plan.aspx> and <http://www.parkplanning.nps.gov/document.cfm?parkID=303&projectID=38234&documentID=47940>, respectively. In response to the comment, the EA now provides the links.

Comment: Respond to our scoping comments not addressed in the draft EA (Crissy Field Dog Group).

Response: The Trust made a good-faith effort to respond to each of the Crissy Field Dog Group concerns in the draft EA as cited in the following table:

Comment	Response
<ul style="list-style-type: none">• First, provide better outreach to the public	<ul style="list-style-type: none">• See Public Participation section (draft EA, pages 58-59)
<ul style="list-style-type: none">• Second, find better locations for the Sports Basement	<ul style="list-style-type: none">• See Other Alternatives section (Sports Basement at Other Alternative Sites) (draft EA, pages 17-18) and Response to Comment “Identify other locations within the Presidio...” (draft EA, pages 60-61)
<ul style="list-style-type: none">• Third, conduct thorough traffic analysis	<ul style="list-style-type: none">• See Transportation section, (draft EA, pages 22-25) as modified and Response to Comment “Quantify and analyze changes to Mason Street...” (draft EA, page 65)
<ul style="list-style-type: none">• Fourth, avoid spillover parking at East Beach	<ul style="list-style-type: none">• See Parking section, (draft EA, pages 26-28) as modified and Response to Comment “Consider alternatives, including free parking...” (draft EA, page 66)
<ul style="list-style-type: none">• Fifth, come up with a more viable location for Sports Basement	<ul style="list-style-type: none">• See Response to Comment “Second, find better locations...” above
<ul style="list-style-type: none">• Sixth, conduct objective analysis on the bird population	<ul style="list-style-type: none">• See Response to Comment “Conduct an analysis on the bird population...” (draft EA, page 72)
<ul style="list-style-type: none">• Seventh, analyze the Exploratorium’s use of the buildings	<ul style="list-style-type: none">• See Other Alternatives section (Warehouse) (draft EA, pages 16-17) and Response to Comment “Analyze warehouse use...” (draft EA, page 60)

The Trust finds that the analysis as supplemented in this response to comments and the EA is sufficient and no further response is necessary.

Attachment 6

MEMORANDUM OF AGREEMENT

**MEMORANDUM OF AGREEMENT
BETWEEN THE PRESIDIO TRUST,
THE CALIFORNIA STATE HISTORIC PRESERVATION OFFICER,
AND THE NATIONAL PARK SERVICE
REGARDING THE REHABILITATION OF BUILDINGS 1182, 1183, 1184, 1185, 1186, 1187 AND
1188 (MASON STREET WAREHOUSES),
PRESIDIO OF SAN FRANCISCO NATIONAL HISTORIC LANDMARK,
SAN FRANCISCO, CALIFORNIA**

WHEREAS, the Presidio Trust (Trust) plans to enter into a lease agreement with a tenant to fund the rehabilitation of buildings 1182, 1183, 1184, 1185, 1186, 1187 and 1188, collectively known as the Mason Street Warehouses, in the Crissy Field area of the Presidio of San Francisco for use as a sporting goods retail store (Project); and

WHEREAS, the Trust plans to carry out the Project pursuant to the Presidio Trust Act, 16 U.S.C. 460bb appendix, thereby making the Project an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA), 54 U.S.C. 306108, and its implementing regulations, 36 C.F.R. Part 800, and Stipulation IV(A) of the *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, Golden Gate National Recreation Area, San Francisco, California* (“Presidio Trust Programmatic Agreement” [PTPA, 2014]); and

WHEREAS, the Trust has defined the undertaking's area of potential effect (APE) as described in Attachment A; and

WHEREAS, the Trust initiated consultation on the Project pursuant to Stipulation IX(C) of the 2002 PTPA on July 12, 2013, with a preliminary finding of no adverse effect, and requested concurrence from the SHPO and NPS (signatory parties to the PTPA) on the finding; and

WHEREAS, the Trust coordinated the NHPA process for the Project with review of an Environmental Assessment (EA) under the National Environmental Policy Act (NEPA), holding a public meeting on July 22, 2013, and using public comments gathered through the EA process to inform consultation under the NHPA; and

WHEREAS, the NPS did not concur with the finding of no adverse effect as stated in comments dated November 22, 2013, and reiterated in a letter dated November 25, 2013; and

WHEREAS, the Trust held two (2) consultation meetings (November 25, 2013, and December 16, 2014) and submitted two (2) consultation packages following initiation of consultation (October 11, 2013, and December 15, 2014), and a final package of designs confirming the outcome of the meeting on December 16, 2014, in order to present the Project, address comments on the proposed rehabilitation from the Parties to the PTPA, and modified the rehabilitation approach to address those comments (see Attachment B for final meeting minutes and architectural representations of the revised design); and

WHEREAS, on January 8, 2015, the NPS notified the Trust that while the changes to the proposed

rehabilitation reduced the impact, there was not consensus for an assessment of no adverse effect; and

WHEREAS, the 2002 PTPA was superseded by 2014 PTPA, executed on April 30, 2014; and

WHEREAS, both the 2002 PTPA and 2014 PTPA direct the Trust to resolve the adverse effect in accordance with 36 CFR 800.6 if parties fail to reach agreement on measures to avoid adverse effects; and

WHEREAS, in accordance with 36 C.F.R. § 800.6(a)(1), the Trust notified the Advisory Council on Historic Preservation (ACHP) on March 10, 2015, of the lack of concurrence between the parties on the effects determination for the Project, and on April 14, 2015, the Trust notified parties of its revised finding of effect to “adverse”, providing the specified documentation, and

WHEREAS, on April 17, 2015, the ACHP notified the Trust that it has chosen not to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

WHEREAS, the Trust has consulted with the National Park Service – Golden Gate National Recreation Area (NPS-GOGA), and the National Park Service – Pacific West Regional Office (NPS-PWRO) regarding the effects of the undertaking on historic properties and has invited NPS to sign this MOA as an invited signatory; and

NOW, THEREFORE, the Trust, SHPO, and NPS agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.

STIPULATIONS

The Trust shall ensure that the following measures are carried out:

I. DOCUMENTATION

- A. Prior to beginning work on the Mason Street Warehouses or their associated site, the Trust will complete recordation and documentation of these resources in accordance with the *Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation*. The Trust shall consult with the NPS HABS/HAER/HALS program in the Pacific West Regional Office to determine the level and kind of recordation appropriate for the resources.
- B. In addition to the requisite copies for final submission to the Heritage Documentation Programs, the Trust will make archival, digital and bound library-quality copies of HABS documentation available, as appropriate, to the NPS/GGNRA Archives, the San Francisco History Room of the San Francisco Public Library, and the California Historical Resource Information System's Northwest Information Center.

II. INTERPRETATION

- A. The Trust will develop interpretive content and signs to be displayed on the buildings' interior as part of the rehabilitation. Signs will include at a minimum, but not be limited to, interior-mounted building information signs at each of the two (2) main public entrances. Specifications will follow Trust standards for interior interpretive signs (see Attachment C).

- B. The Trust will also ensure that interior sign content is coordinated with exterior interpretive waysides that will be developed and installed by others (via the Doyle Drive project).

III. LEASE AGREEMENT TERMS

- A. The Trust will include language in the lease governing the operation of the new bi-fold door that will be incorporated into the west elevation of building 1185. The lease language shall require the tenant to close the new bi-fold door during non-business hours.

IV. DESIGN PROGRESS SET REVIEW

- A. The Trust will submit a 65% design development set of drawings depicting the seismic design and interior wall treatments for comment by the signatory parties to this agreement.
- B. Written comments from the signatory parties on these design submissions received by the Trust within twenty-one (21) calendar days of the submission will be considered.
- C. If a party does not comment within twenty-one (21) calendar days, and does not notify the Trust and request an additional period to submit comments that shall not exceed ten (10) calendar days, the Trust may proceed.

V. POST-REVIEW DISCOVERIES

- A. If it appears that the undertaking will affect a previously unidentified property that may be eligible for inclusion in the National Register, or affect a known eligible or historic property in an unanticipated manner, the Trust will stop construction activities in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the property.
 - 1. If an unanticipated effect should occur, the Trust shall notify signatories within two (2) working days by phone and shall e-mail and describe the DFPO's assessment of the effect and proposed measures to avoid adverse effects.
 - 2. The signatory parties shall respond within two (2) working days of the notification by e-mail.
 - 3. The Trust DFPO shall implement their recommendations regarding avoidance of adverse effects or treat the newly-discovered resource as historic, and then shall carry out appropriate actions.
 - 4. The Trust DFPO shall provide the signatories a report of the actions when they are completed.
- B. Because of the residual potential of ground disturbing activities to impact potentially buried archaeological sites, avoidance of archaeological resources will be an objective of all phases of design and implementation.
- C. An Archaeological Management Assessment will be prepared for the project to ensure that any discoveries are handled in compliance with the protocols in this MOA. Archaeological monitoring of ground disturbance by an archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology will ensure that any archaeological resources present in the project area are identified and treated appropriately.
- D. If an archaeological discovery should occur, the Trust will stop construction activities in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the property.

1. The Trust shall notify signatories within two (2) working days of the discovery by phone and shall e-mail and describe the DFPO or Principal Archaeologist's proposed actions to avoid any adverse effects.
2. The signatory parties shall respond within two (2) working days of the notification by e-mail.
3. The Trust DFPO shall implement their recommendations regarding avoidance of adverse effects and National Register eligibility, or treat the newly-discovered resource as historic, and then shall carry out appropriate actions.
4. The Trust DFPO shall provide the signatories a report of the actions when they are completed.

VI. REPORTING

- A. On or before January 30 of each reporting year, so long as this MOA is in effect, the Trust will include project updates in conjunction with its PTPA annual report, describing how the agency is carrying out its responsibilities under this MOA.
- B. The Trust will make the annual report available via its website (www.presidiotrust.gov), a hard copy in the Trust Library, and through a mailing to the signatory and concurring parties to the PTPA.

VII. DURATION

- A. This MOA will expire if its stipulations are not carried out within three (3) years from the date of its execution, or at such time that the project is completed, whichever is shorter. The Trust shall notify the signatories of the expiration.
- B. Prior to expiration of the MOA, the Trust may consult with the other signatories and invited signatories to reconsider the terms of the agreement and amend it in accordance with Stipulation VIII below.

VIII. AMENDMENTS

- A. This MOA may be amended when such an amendment is agreed to in writing by all signatories.
- B. The amendment will be effective on the date a copy signed by all of the signatories is filed with the ACHP.

IX. DISPUTE RESOLUTION

- A. Should any signatory or invited signatory to this MOA object at any time to any actions proposed or the manner in which the terms of this MOA are implemented, the Trust shall consult with such party to resolve the objection. All work that is the subject of the dispute will stop until the dispute is resolved in accordance with the procedures in this section. If the dispute cannot be resolved, the Trust shall notify all signatory, invited signatory and concurring parties to the MOA and the Trust shall:
 1. Forward all documentation relevant to the dispute, including the Trust's proposed resolution, to the ACHP. The ACHP shall provide the Trust with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, the Trust shall prepare a written response

that takes into account any timely advice or comments regarding the dispute from the ACHP and other signatory parties, and provide them with a copy of this written response. The Trust will then proceed according to its final decision.

2. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period, the Trust may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, the Trust shall prepare a written response that takes into account any timely comments regarding the dispute from the signatory parties to the MOA, and provide them and the ACHP with a copy of such written response.
3. The Trust's responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remain unchanged.

X. TERMINATION

- A. If any signatory to this MOA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other parties to attempt to develop an amendment per Stipulation VIII, above.
- B. If within thirty (30) days (or another time period agreed to by all signatories) an amendment cannot be reached, any signatory may terminate the MOA upon written notification to the other signatories.
- C. Once the MOA is terminated, work on the undertaking will cease until (a) another MOA is executed pursuant to 36 C.F.R. § 800.6, or (b) the Trust requests, takes into account, and responds to the comments of the ACHP under 36 C.F.R. § 800.7.
- D. The Trust shall notify the signatories as to the course of action it will pursue.

EXECUTION of this MOA by the Trust, NPS, and SHPO and implementation of its terms evidence that the Trust has taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment.

SIGNATORY:

Presidio Trust
 Date 5/18/15
Craig Middleton, Executive Director

INVITED SIGNATORIES:

National Park Service

 Date 6/1/15
Pacific West Regional Director

SIGNATORY:

California State Historic Preservation Officer

 Date 6/9/15
for Carol Roland-Nawi, California SHPO

List of Attachments: Mason Street Warehouses Memorandum of Agreement 2015

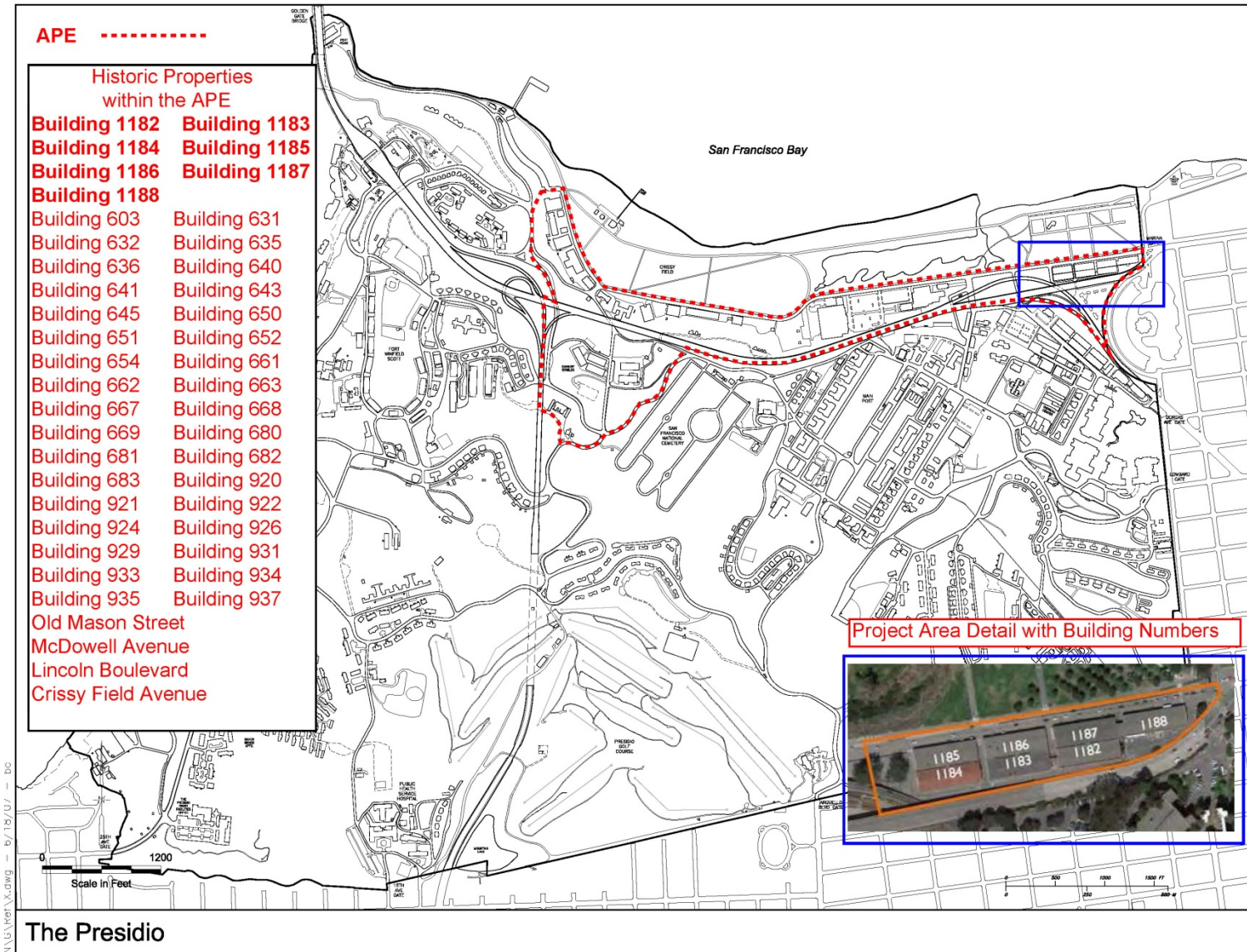
Attachment A: Area of Potential Effect

Attachment B: Meeting minutes from December 16, 2014 consultation meeting confirming design changes to the undertaking and supplemental drawings

Attachment C: Interior interpretive signage specifications

Attachment D: Lease language regarding operation of the bi-fold door at the west elevation of building 1185

ATTACHMENT A



The Presidio

ATTACHMENT B

Mason Street Warehouses/Sports Basement Rehabilitation Project

December 16, 2014 Consultation Meeting Follow up Notes

Attendees:

Rob Thomson, Josh Bagley – Presidio Trust

Jay Turnbull, Chris von Eckartsberg, Marueen Hardy, Dave Rumberg – Sports Basement Project Team

Mark Beason, Mark Huck – Office of Historic Preservation

Elaine Jackson-Retondo, Kristin Baron – National Park Service (via phone)

The below memo summarizes design changes agreed to by the project team at the 12/16 meeting. A revised package of renderings and plans that illustrate the below items will follow this summary so as to confirm project details. References below to alternative studies are from the December 15, 2014 package prepared by BCV.

Design Exploration 1

The configuration of new walkways/decking will be modified in accordance with SHPO comments. Alternative 2 and the Preferred Option will be combined into a new Alternative 4 (no deck on west elevation of 1184/1185 and no rear deck on the south elevation of 1182).

Design Exploration 2

The barn door on the west elevation of 1184 will be repaired and retained consistent with SHPO comments.

The new opening in the west elevation of building 1185 will be masked by a bi-fold door as shown in the Bi-fold Overhead Door Alternative

Design Exploration 3

The project team will modify the Preferred Option to retain 1 bay of wall at each end of the single north/south opening. This reduces the number of removed/retained wall bays from 9/17 to 7/17, and moves the loss/retention percentage from 44/56% to 34/66%.

Design Exploration 4

The project will incorporate Alternative 2, which eliminates the skylight on 1184.

Design Exploration 5

All 20 sliding door openings on the 4 Mason Street elevations will receive recessed glazed infill, some fixed and some acting as entrances/exits. All barn doors and hardware will be retained and set in the open position on this elevation.

Design Exploration 6

Trust sign guidelines are developed to minimize clutter and visual impact of new signage on historic buildings and their surroundings. This particular building cluster lacks any immediately adjacent historic properties, aside from Mason Street itself. Guidelines for these buildings mirror those of the similar Gorgas Avenue Warehouses, though the two building complexes are not visible from one another. Specific implementation of the Guidelines at this location would include (slight revision from summary presented on 12/16):

- 1 eyebrow OR blade sign per building
- 2 freestanding building ID sign for the group
- 1 Tenant ID located at each of the main entrances only
- Directional signs as needed

No large logos directly on the east or west elevations or pole-mounted banners along Mason Street will be permitted under the sign guidelines.

Fire pits have been eliminated from the design.

East/West Connectors

The Trust presented a study illustrating the history of how the Army connected these types of buildings to each other. The current proposal to use lightweight, transparent connectors at the east/west ends, along with recessed stairs at the intermediate points represents a highly-compatible solution to creating universal access to all buildings in a minimal, additive way. The project does not propose to change this feature.

Seismic Strategy

The Trust is confident that, given the construction type and materials of these buildings, a seismic scheme can be developed that avoids adverse effects. Moment/braced frames and shear panels can successfully and compatibly be inserted into buildings of this type where exposed structure is a character defining feature. The Trust's experience installing seismic systems in other similar buildings will aid in further design development. The Trust will plan to submit a progress set of the structural design to SHPO as a condition of concurrence with a finding of "no adverse effect" for the project.

Traffic, Parking and Landscaping

The Trust has prepared a 17-page summary response addressing NPS comments regarding traffic, parking and intensity of use. The Trust has not received further comments from NPS traffic and planning staff in response to this memo. Detailed analysis of traffic, parking and use impacts are included in the NEPA documents prepared for the project, and will be updated with the issuance of the Final EA. No additional follow up on this item is planned.

SPORTS BASEMENT **MASON STREET WAREHOUSES**
THE PRESIDIO, SAN FRANCISCO CALIFORNIA

CONFIRMED DESIGN CHANGES BASED ON
DECEMBER 16, 2014 CONSULTATION MEETING
DECEMBER 19, 2014

BCV BALDAUF CATTON VON ECKARTSBERG ARCHITECTS
1827 STOCKTON ST. SAN FRANCISCO, CA 94133 T 415.398.6558 F 415.398.6521 BEVARCH.COM

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CONFIRMED DESIGN CHANGES BASED ON
DECEMBER 16, 2014 CONSULTATION MEETING

TABLE OF CONTENTS

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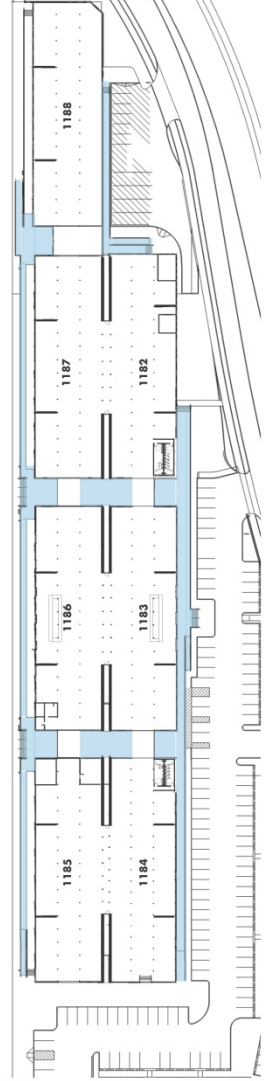
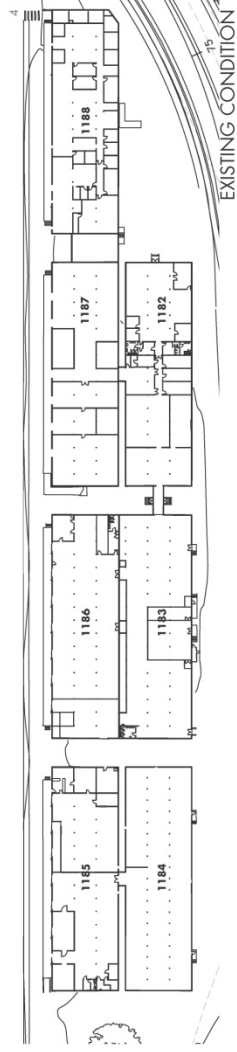
BCV SPORTS BASEMENT
MASON STREET

DECEMBER 19, 2014

DESIGN EXPLORATION 1 LOADING DOCK EXTENSIONS & DECKS

BCV SPORTS BASEMENT
MASON STREET

DECEMBER 19, 2014



New Preferred Option: The existing, separate loading docks at Mason Street are connected and extended by new loading dock/deck elements (in blue) to form a continuous, elevated walkway of code-required width for the proposed occupancy with shared stairs and ramps.

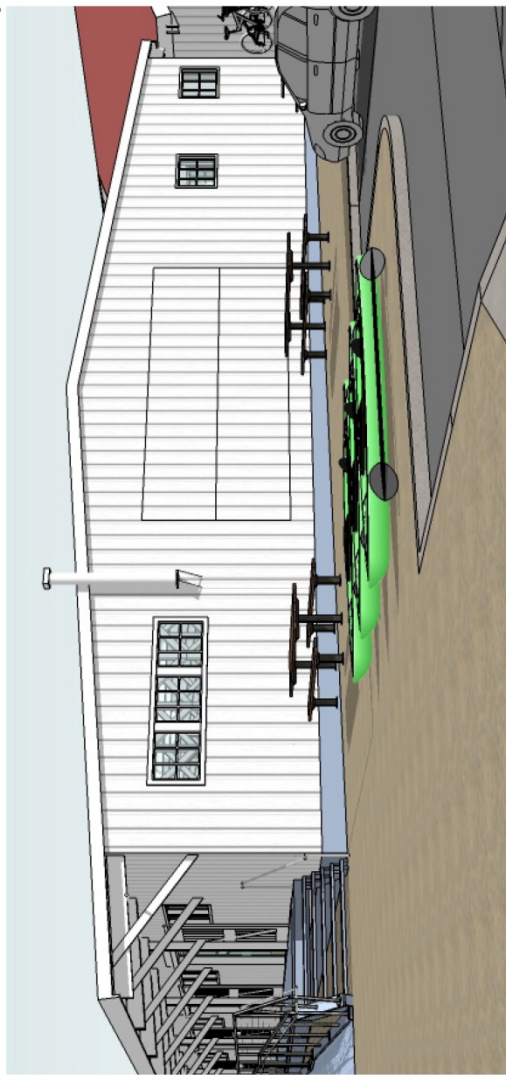
BCV SPORTS BASEMENT
MASON STREET

PLAN DIAGRAM
DESIGN EXPLORATION 1: LOADING DOCK EXTENSIONS & DECKS
DECEMBER 19, 2014

DESIGN EXPLORATION 2 WEST ELEVATION OF BUILDINGS 1184/1185

BCV SPORTS BASEMENT
MASON STREET

DECEMBER 19, 2014



BIFOLD OVERHEAD DOOR ALTERNATIVE - NEW PREFERRED OPTION

Bifold Overhead Door Alternative - New Preferred Option: A new glazed opening at **B1185** matches the width of the new openings connecting the ends of each pair of buildings, and takes advantage of the view to the Golden Gate. A new operable bifold overhead door completely conceals this opening when in the closed position, and is clad with the original historic board & batten material. The glazed opening is comprised of operable glass sliding doors and guardrail.

BCV SPORTS BASEMENT
MASON STREET

DETAILED VIEW

DESIGN EXPLORATION 2: WEST ELEVATION OF 1184/1185

DECEMBER 19, 2014

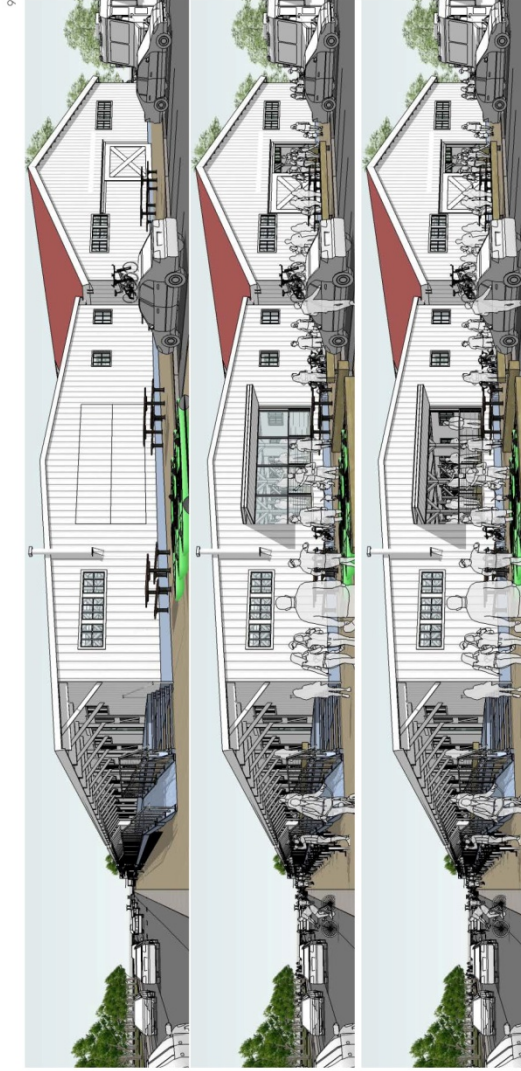


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BCV SPORTS BASEMENT MASON STREET DETAILED VIEW

DESIGN EXPLORATION 2: WEST ELEVATION OF 1184/1185
DECEMBER 19, 2014



BIFOLD OVERHEAD DOOR ALTERNATIVE - NEW PREFERRED OPTION

Bifold Overhead Door Alternative - New Preferred Option: A new glazed opening at **B1185** matches the width of the new openings connecting the ends of each pair of buildings, and takes advantage of the view to the Golden Gate. A new operable bifold overhead door completely conceals this opening when in the closed position, and is clad with the original historic board & batten material. The glazed opening is comprised of operable glass sliding doors and guardrail.

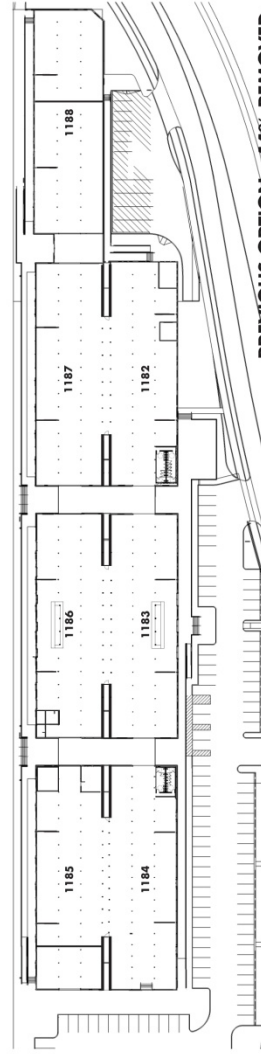
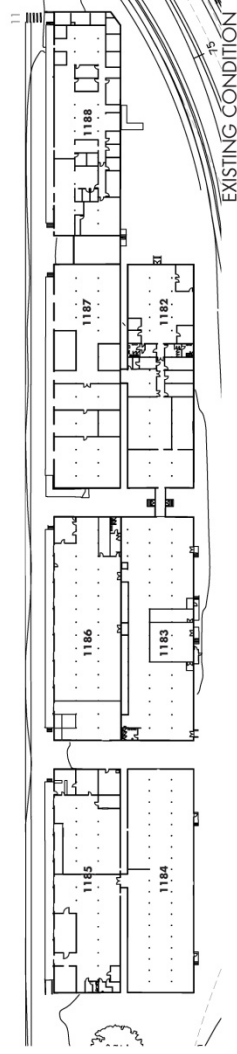
BCV SPORTS BASEMENT MASON STREET DETAILED VIEW

DESIGN EXPLORATION 2: WEST ELEVATION OF 1184/1185
DECEMBER 19, 2014

DESIGN EXPLORATION 3 INTERIOR / PARTITIONS

BCV SPORTS BASEMENT
MASON STREET

DECEMBER 19, 2014



PREVIOUS OPTION - 44% REMOVED

Previous Option: The proposed connections between buildings limit the removal of existing wall to a single opening between building pairs. These connections use, where possible, the limited historic existing openings already available. The wall openings are the same in all three pairs of buildings. Previously, the removal of existing wall was calculated at 53% of the number of bay openings (9 bays out of 7); subsequent calculations include the area of retained historic fabric at the header and structural posts that yield a revised removal of existing wall of 44%.

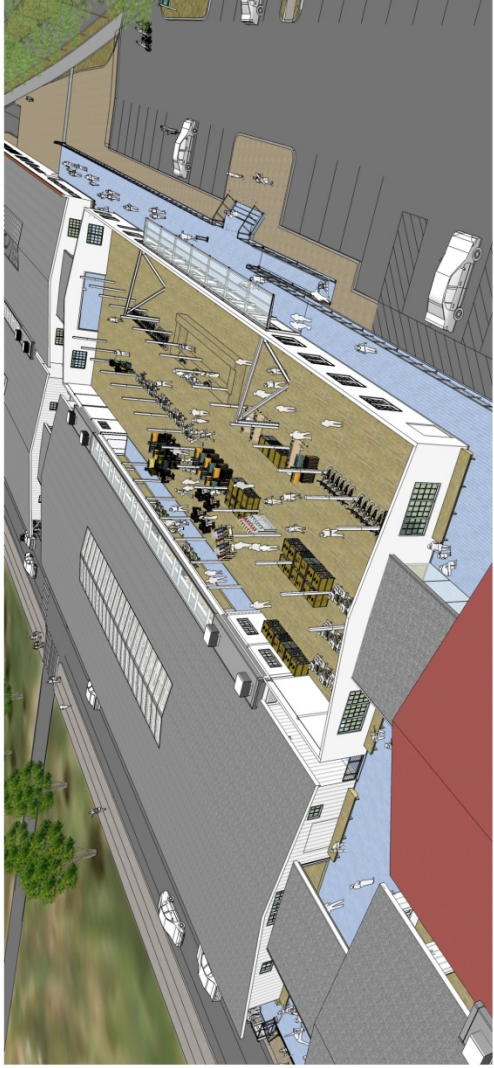
BCV SPORTS BASEMENT
MASON STREET

NORTH/SOUTH BUILDING CONNECTIONS

DESIGN EXPLORATION 3: INTERIOR/PARTITIONS

DECEMBER 19, 2014

12



PREVIOUS OPTION

Previous Option: The proposed connections between buildings limit the removal of existing wall to a single opening between building pairs. These connections use, where possible, the limited historic existing openings already available. The wall openings are the same in all three pairs of buildings. Existing historic exterior board and batten cladding remains at the header condition above the new opening. Previously, the removal of existing wall was calculated at 53% of the number of bay openings (9 bays out of 17); subsequent calculations include the area of retained historic fabric at the header and structural posts that yield a revised removal of existing wall of 44%.

BCV SPORTS BASEMENT
MASON STREET

DESIGN EXPLORATION 3: INTERIOR/PARTITIONS

DECEMBER 19, 2014

13



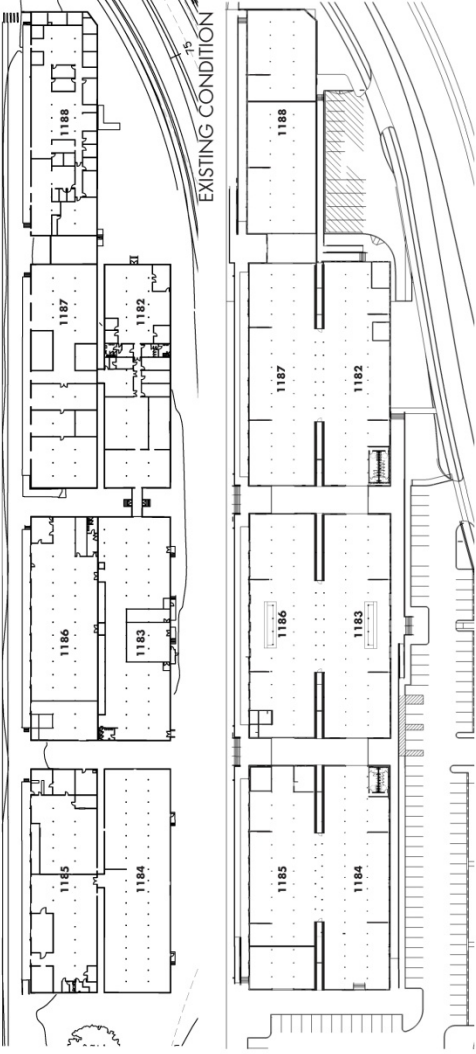
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BCV SPORTS BASEMENT
MASON STREET

DESIGN EXPLORATION 3: INTERIOR/PARTITIONS

DECEMBER 19, 2014



NEW PREFERRED OPTION - 34% REMOVED

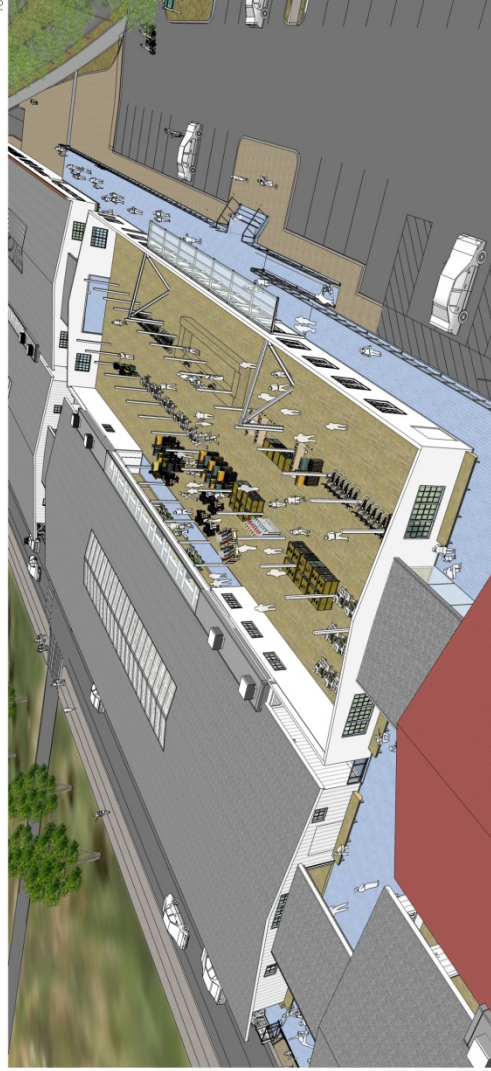
PER BUILDING =
2244 SQ. FT. TOTAL HISTORIC FABRIC
1474 SQ. FT. HISTORIC RETENTION
770 SQ. FT. OR 34% PROPOSED REMOVAL

New Preferred Option: The proposed connections between buildings limit the removal of existing wall to a single opening between building pairs. These connections use, where possible, the limited historic existing openings already available. The wall openings are the same in all three pairs of buildings. Existing historic exterior board and batten cladding remains at the header condition above the new opening.

BCV SPORT'S BASEMENT
MASON STREET NORTH/SOUTH BUILDING CONNECTIONS

DESIGN EXPLORATION 3: INTERIOR/PARTITIONS

DECEMBER 19, 2014



NEW PREFERRED OPTION

New Preferred Option: The proposed connections between buildings limit the removal of existing wall to a single opening between building pairs. These connections use, where possible, the limited historic existing openings already available. The wall openings are the same in all three pairs of buildings. Existing historic exterior board and batten cladding remains at the header condition above the new opening.

BCV SPORT'S BASEMENT
MASON STREET NORTH/SOUTH BUILDING CONNECTIONS

DESIGN EXPLORATION 3: INTERIOR/PARTITIONS

DECEMBER 19, 2014



NEW PREFERRED OPTION

New Preferred Option. The proposed connections between buildings limit the removal of existing wall to a single opening between building pairs. These connections use, where possible, the limited historic existing openings already available. The wall openings are the same in all three pairs of buildings. Existing historic exterior board and batten cladding remains at the header condition above the new opening.

BCV SPORTS BASEMENT
MASON STREET

NORTH/SOUTH BUILDING CONNECTIONS

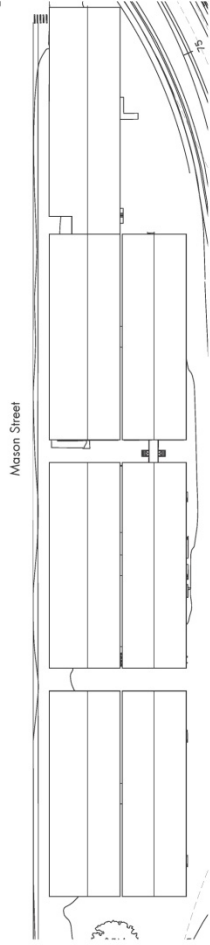
DESIGN EXPLORATION 3: INTERIOR/PARTITIONS

DECEMBER 19, 2014

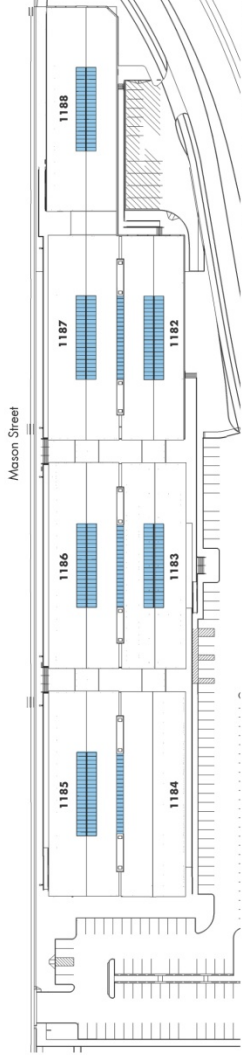
DESIGN EXPLORATION 4
SKYLIGHTS

BCV SPORTS BASEMENT
MASON STREET

DECEMBER 19, 2014



EXISTING CONDITION



NEW PREFERRED OPTION

New Preferred Option: The low-profile translucent roof/skylights at the ridges of the 6 low-roofed buildings allow for daylighting within the buildings and are not visible to park users from vantage points within the vicinity. There is no translucent roof / skylight proposed for B 1184.

BCV SPORTS BASEMENT
MASON STREET ROOF PLAN

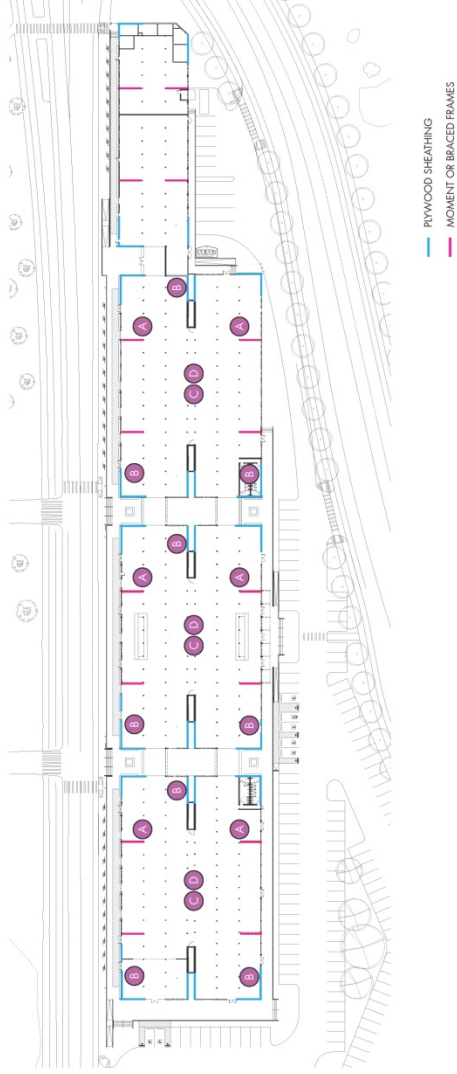
DESIGN EXPLORATION 4: SKYLIGHTS

DECEMBER 19, 2014

DESIGN EXPLORATION 7
SEISMIC UPGRADE

BCV SPORTS BASEMENT
MASON STREET

DECEMBER 19, 2014

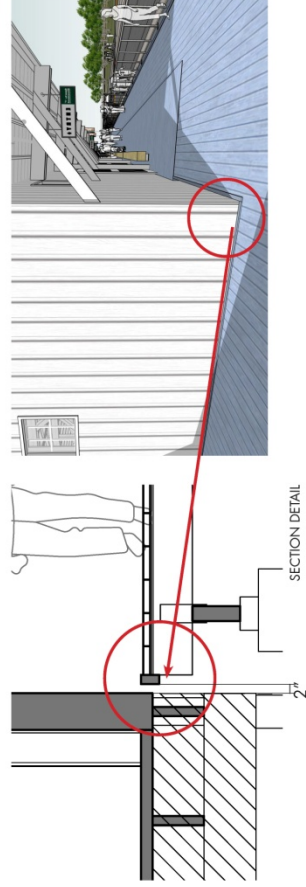
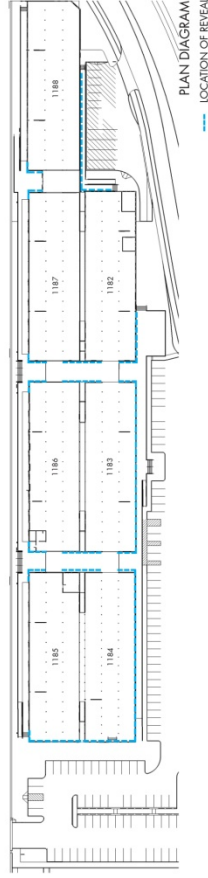


- 1 Moment or braced frames to collect roof seismic load
- 2 Plywood sheathing to collect seismic load
- 3 Plywood sheathing at roof diaphragm to new collector beams
- 4 New grade beam foundations to support frames and shear walls

*Note: all structural interventions are conceptual design only

BCV SPORTS BASEMENT | **MASON STREET** | SEISMIC PLAN DIAGRAM

SEISMIC UPGRADE
DECEMBER 19, 2014



A continuous 2" gap as a reveal is proposed where new dock extensions/decks are adjacent to existing building. This gap allows the existing board and batten siding to continue to the ground without interruption or removal. It also reinforces the separate identity of the areas of new dock extension/deck from the existing.

BCV SPORTS BASEMENT | **MASON STREET**

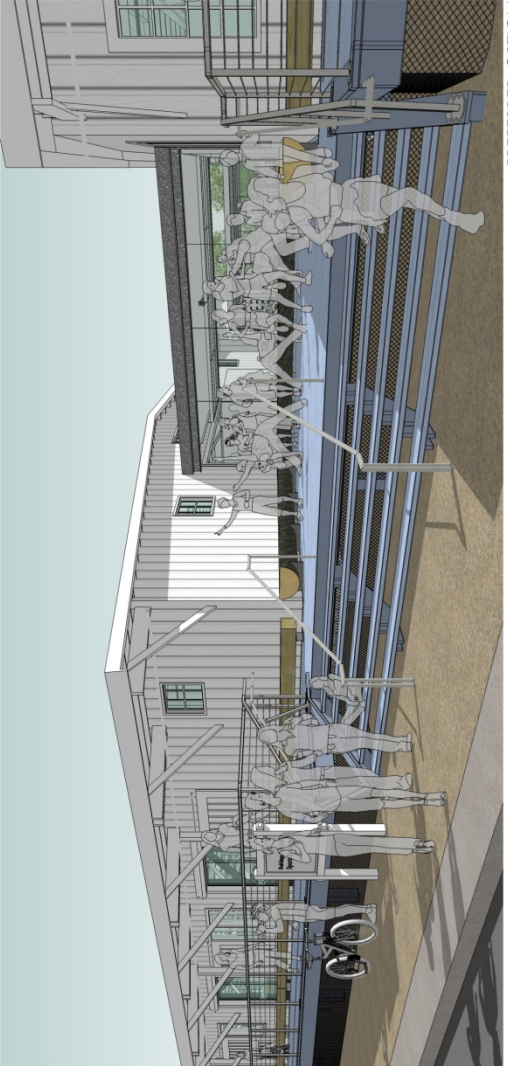
DESIGN EXPLORATION 1: LOADING DOCK EXTENSIONS & DECKS
2014 MAY 28



Preferred Option: Character-defining interior elements are intended to remain or be reused elsewhere, when not in significant conflict with tenant's layout, for example:

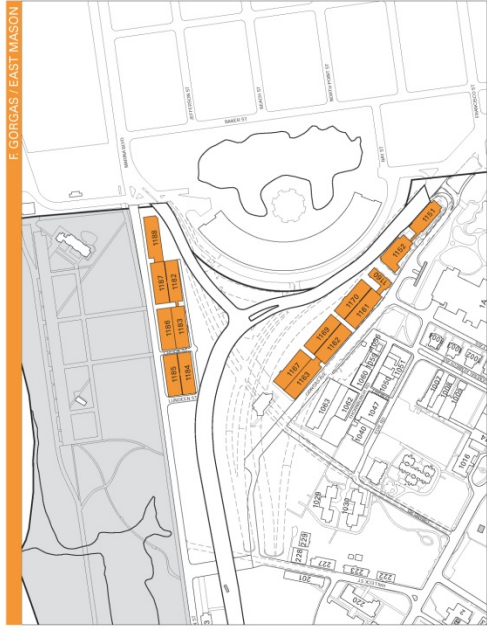
- ① 1185 Kitchen with redwood-clad walls and ceiling
- ② 1186 Salvage & reuse redwood planks
- ③ 1185 Entry/Office
- ④ 1182 Office to remain
- ⑤ 1186 Storage rooms to remain
- ⑥ 1182 Salvage & reuse beadboard wall cladding

BCV SPORTS BASEMENT MASON STREET REUSE OF EXISTING INTERIOR ELEMENTS **DESIGN EXPLORATION 3: INTERIOR/PARTITIONS** 2014 MAY 28



Preferred Option: The "campsite" locations will no longer contain fire pits. All building signage will comply with Presidio signage guidelines, and is not shown at this time.

BCV SPORTS BASEMENT MASON STREET VIEW FROM MASON STREET **DESIGN EXPLORATION 6: DECK FURNISHINGS & SIGNAGE** OCTOBER 2014



EXCERPTS FROM PRESIDIO SIGNAGE GUIDELINES

BCV | SPORTS BASEMENT | MASON STREET | SIGNAGE GUIDELINES | DESIGN EXPLORATION 6: DECK FURNISHINGS & SIGNAGE | OCTOBER 2014

	OFFICE TENANTS	PUBLIC-SERVING TENANTS
FRESHBROWNS Every residential building will have a Freshbrowns sign. The sign will be a 10' x 10' sign with a white background and a black border. The sign will be located on the building's facade.	OFFICE TENANTS Large signs permitted for buildings 115-1192.	OFFICE TENANTS Large signs permitted for buildings 115-1192.
WALL MOUNTED TENANT ID Only participating tenants may use wall-mounted signs. Signs must be 10' x 10' or smaller and must be placed on the building's facade.	OFFICE TENANTS Large signs permitted for buildings 115-1192.	OFFICE TENANTS Large signs permitted for buildings 115-1192.
WALL MOUNTED DIRECTIONAL SIGN	OFFICE TENANTS Large signs permitted for buildings 115-1192.	OFFICE TENANTS Large signs permitted for buildings 115-1192.
EYEBROW SIGN Eyebrow signs are permitted for public-serving tenants only. Signs must be 10' x 10' or smaller and must be placed on the building's facade.	OFFICE TENANTS Large signs permitted for buildings 115-1192.	OFFICE TENANTS Large signs permitted for buildings 115-1192.
BLAZE SIGN Blaze signs are permitted for public-serving tenants only. Signs must be 10' x 10' or smaller and must be placed on the building's facade.	OFFICE TENANTS Large signs permitted for buildings 115-1192.	OFFICE TENANTS Large signs permitted for buildings 115-1192.
BILBOES WAREHOUSE SIGN All buildings within the Bilboes Warehouse area must have a sign that reads "Bilboes Warehouse".	OFFICE TENANTS Large signs permitted for buildings 115-1192.	OFFICE TENANTS Large signs permitted for buildings 115-1192.

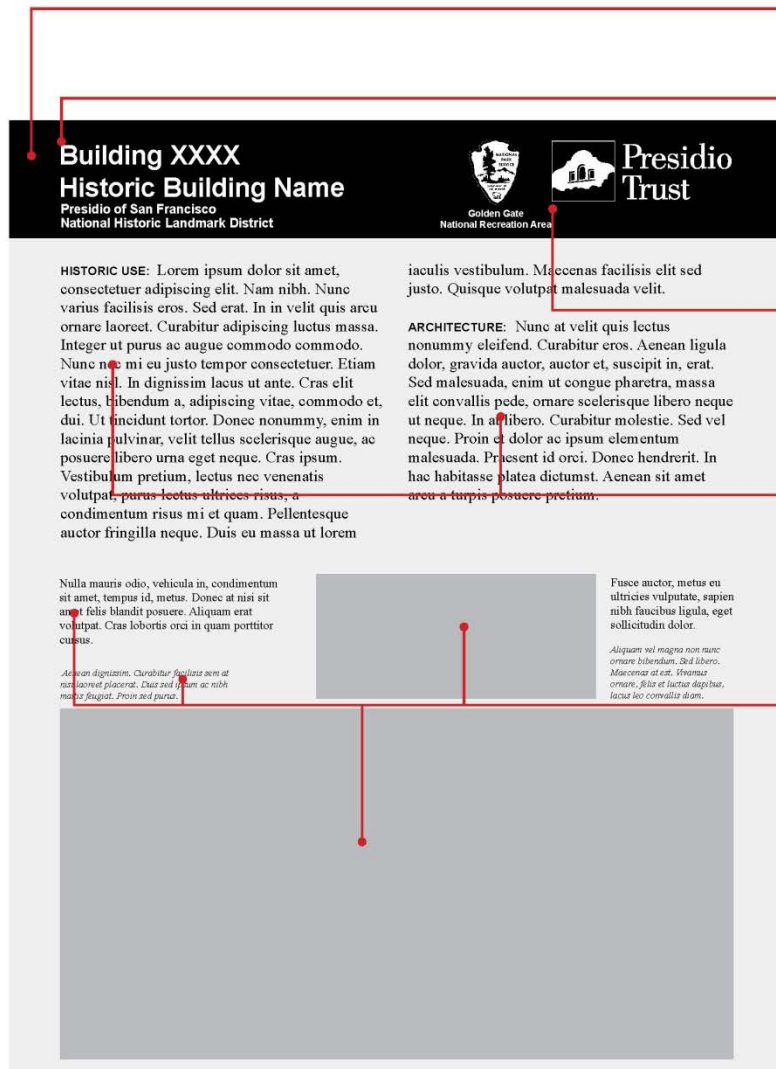
EXCERPTS FROM PRESIDIO SIGNAGE GUIDELINES

BCV | SPORTS BASEMENT | MASON STREET | SIGNAGE GUIDELINES | DESIGN EXPLORATION 6: DECK FURNISHINGS & SIGNAGE | OCTOBER 2014

BCV | SPORTS BASEMENT | MASON STREET | SIGNAGE GUIDELINES | DESIGN EXPLORATION 6: DECK FURNISHINGS & SIGNAGE | OCTOBER 2014

ATTACHMENT C

Standard Specifications for Interior Historic Building Interpretive Signs



Header:

16" black horizontal band, Portrait orientation, with the following content in white:

- LEFT JUSTIFIED
 - Building [Number] (Font: Arial, 40pt, Bold)
 - [Building Name per the 1993 or 2008 NHL Update] (Font: Arial, 40pt, Bold)
 - Presidio of San Francisco (Font: Arial, 19 pt, Bold)
 - National Historic Landmark District (Font: Arial, 19 pt, Bold)
- RIGHT JUSTIFIED
 - NPS Arrowhead logo, Golden Gate National Recreation Area underneath (left)
 - Presidio Trust logo (right)

Content:

Two column text (Font: Times New Roman, 24 pt), beginning with:

- HISTORIC USE: [120-130 word summary of the building's use during the Army period]
- ARCHITECTURE: [70-80 word summary of the building's architectural style, context and distinctive features]

Graphics:

- 1-3 historic images
- Resolution of at least 300 ppi
- 20-40 word image captions (Font: Times New Roman, 18 pt) with image credits (Font: Times New Roman, 14 pt, Italicized)

Fabrication specifications:

- Vendor: KVO Industries
- ZED (digitally embedded continuous tone graphics) Embedded digital panels
- 16 3/8" x 20 3/8" x 1/8 interior grade
- Clear coat finish to aluminum frames

ATTACHMENT D

The Trust will include the following language in the Use and Rules section of the Mason Street Warehouses lease:

“The tenant will close the bi-fold door on the west elevation of building 1185 during non-business hours.”

The executed MOA will also be included as an exhibit to the lease.

San Francisco Bay



Presidio
Trust

*Mason Street Warehouses
(Buildings 1182-1188)*

Pacific Ocean

Main Post

