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Presidio Trust Management Plan  
Main Post Update

# Draft Supplemental Environmental Impact Statement

THE PRESIDIO TRUST  
JUNE 2008

*“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.”*

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

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Presidio Trust Management Plan  
Main Post Update  
Draft Supplemental Environmental Impact Statement  
The Presidio of San Francisco, CA

## Lead Agency

The Presidio Trust (Trust), a federal corporation created by Congress in 1996, is the lead agency for the proposed action under the National Environmental Policy Act. The Trust oversees the interior 1,168 acres (Area B) of the Presidio of San Francisco, while the National Park Service manages the 323 coastal acres (Area A) of the former military post. The Trust must preserve and enhance the Presidio as a national park and be financially self-sufficient by 2013.

## Abstract

The Trust proposes to make substantial changes to the planning concept for the 120-acre Main Post district described in the 2002 Presidio Trust Management Plan (PTMP), the Trust's comprehensive land use plan and policy framework for Area B. The planning proposals that are now being considered, including stand-alone structures for a major cultural institution and lodge, warrant supplementation of the final PTMP Environmental Impact Statement (EIS). This supplement to the final PTMP EIS takes into account these new circumstances and other information to provide an updated land use policy and procedural framework to guide future Trust decisions at the Main Post. The supplemental EIS (SEIS) evaluates four alternatives to the PTMP planning concept, including the proposed action. The four alternatives identify various locations for the key planning proposals within and outside the district. The alternatives also propose different building uses, amounts of demolition and maximum new construction, and total building areas for the Main Post. The SEIS describes potential impacts associated with each alternative, together with mitigation measures that would reduce or eliminate those impacts.

## Public Comments

The Trust is requesting comments on the adequacy of the draft SEIS and/or the merits of the alternatives on or before July 31, 2008. Oral comments on the draft SEIS will be accepted from the public at a Trust Board of Directors meeting on July 14, 2008 beginning at 6:30 PM, at the Officers' Club, 50 Moraga Avenue, on the Main Post in the Presidio. Electronic comments can be sent to [Mainpost@Presidiotrust.gov](mailto:Mainpost@Presidiotrust.gov). Written comments may be faxed to Main Post at (415) 561-5315 or submitted to Main Post, Attn: Compliance Manager, at the address specified below. The Trust will respond to all substantive comments received in the final SEIS.

## For More Information Contact

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Presidio Trust Management Plan  
Main Post Update

# Draft Supplemental Environmental Impact Statement

## TABLE OF CONTENTS

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Cover Sheet

Summary .....	S-1
Purpose of and Need for Action .....	1
1.1 Purpose of Proposed Action .....	1
1.2 Background .....	1
1.3 Statement of Need .....	4
1.4 Purpose and Contents of Supplemental Environmental Impact Statement .....	6
Alternatives Including Proposed Action .....	9
2.1 Alternative 1: PTMP Visitor and Community Center .....	9
2.2 Alternative 2: Culture and Heritage Center (Proposed Action).....	24
2.3 Alternative 2A: Culture and Heritage Center with Modifications.....	38
2.4 Alternative 3: History Center .....	42
2.5 Alternative 4: Status Quo .....	47
2.6 Other Alternatives .....	52
Affected Environment and Environmental Consequences .....	55
3.1 Land Use.....	55
3.2 Land Use Plans and Policies.....	64
3.3 Transportation and Parking .....	68
3.4 Air Quality.....	109
3.5 Noise.....	120
3.6 Historic Resources.....	128
3.7 Archaeology .....	155
3.8 Visual Resources .....	172

3.9	Visitation.....	199
3.10	Recreation.....	206
3.11	Water Resources .....	209
3.12	Cumulative Impacts .....	219
3.13	Other Impacts.....	238
<b>Public Involvement and Agency Consultation.....</b>		<b>247</b>
4.1	Presidio Lodge EA Scoping Process and Issues Raised During Scoping .....	247
4.2	Art Museum EIS Scoping Process and Issues Raised During Scoping .....	253
4.3	Main Post Update SEIS Scoping Process and Issues Raised During Scoping.....	278
4.4	Consultation Under the National Historic Preservation Act .....	294
<b>Report Preparers / Persons Contacted / Draft SEIS Distribution.....</b>		<b>297</b>
5.1	List of Preparers.....	297
5.2	List of Persons Consulted .....	299
5.3	List of Agencies and Organizations .....	300
<b>Acronyms and Abbreviations.....</b>		<b>302</b>
<b>Glossary.....</b>		<b>305</b>
<b>Index.....</b>		<b>315</b>
<b>Appendices</b>		
A	Transportation Data	
B	Post Construction Stormwater Best Management Practices	

## Tables

1	Summary of Alternatives.....	S-3
2	Alternatives Including the Proposed Action.....	10
3	Presidio Gateways Traffic Volume Summary (Weekday PM Peak Hour Volumes) .....	70
4	Existing (Year 2008) Intersection Operating Conditions (AM and PM Peak Hour).....	73
5	Nearby Muni Transit Lines .....	76
6	Parking Supply and Current Use within the Main Post.....	77
7	Person Trip Generation Rates by Land Use .....	80
8	Main Post Trip Generation by Mode of Travel and by Alternative (Weekday Daily, AM Peak Hour, and PM Peak Hour).....	83
9	Main Post Composite Mode Share and Vehicle Occupancy Rate by Alternative (Weekday Daily, AM Peak Hour, and PM Peak Hour) .....	85
10	Parking Demand by Alternative .....	86
11	Year 2030 AM Peak Hour Levels of Service .....	88
12	Year 2030 PM Peak Hour Levels of Service.....	89
13	Comparison of Factors Used in Evaluating the Relative Significance of Transportation Impacts at Unsignalized Intersections.....	90
14	Intersections Operating at LOS E or F by Alternative.....	91
15	Main post Parking Supply by Alternative .....	95
16	Comparison of main post Weekday Parking Demand and Supply by Alternative.....	96
17	Presidio-Wide Transit Ridership (Number of Trips) by Transit Provider and by Alternative (AM Peak Hour and PM Peak Hour).....	100
18	Intersection Mitigation Measures by Alternative .....	103
19	Unmitigated and Mitigated Levels of Service .....	104
20	Estimated Average Weekday Emissions from Vehicle Trips and Area Sources By Alternative .....	113
21	FHWA Noise Abatement Criteria (Hourly dBA).....	122
22	Summary of Short-Term Noise Measurements .....	122
23	Predicted Historic Archaeological Features within the Main Post that Contribute to the NHL <sup>1</sup> .....	158
24	key Aspects of Levantar .....	163
25	Annual Visitation to the Main Post (thousands).....	200
26	Changes in Impervious Area within the Main Post.....	213

27	changes in Stormwater Runoff within the Main POst .....	214
28	Public Agencies, Organizations, and Individuals Commenting During Scoping for the Presidio Museum EIS .....	254
29	Public Agencies, Organizations, and Individuals Commenting During Scoping for the PTMP Main Post Update SEIS.....	278

## Figures

1	Alternative 1: PTMP Visitor and Community Center.....	12
2	Alternatives 1, 2, 2A, 3, & 4: Building Demolition .....	14
3	Site Plan: Presidio Theatre (Building 99) with Addition .....	16
4	Architect’s Rendering: Presidio Theatre with Addition.....	17
5	Site Plan: Archaeology Center.....	19
6	Site Plan: Pershing Hall .....	20
7	Architect’s Rendering: Pershing Hall .....	21
8	Alternatives 1, 2, 2A, & 4: Circulation .....	23
9	Photograph: Contemporary Art Museum in Commissary Building 610/653.....	25
10	Alternative 2: Culture and Heritage Center .....	27
11	Site Plan: Contemporary Art Museum South of Main Parade .....	29
12	Perspective View: Contemporary Art Museum South of Main Parade .....	30
13	Site Plan: Lodge along Proposed Anza Esplanade .....	33
14	Perspective View: Lodge along Proposed Anza Esplanade.....	34
15	Site Plan: El Presidio de San Francisco .....	35
16	Site Plans: Tennis Courts .....	37
17	Alternative 2A: Culture and Heritage Center with Modifications .....	39
18	Site Plan: Contemporary Art Museum North of Infantry Terrace .....	40
19	Site Plan: Restaurant along Proposed Anza Esplanade.....	41
20	Alternative 3: History Center.....	43
21	Site Plan: History Center South of Main Parade.....	45
22	Perspective View: History Center South of Main Parade .....	46
23	Alternative 3: Circulation .....	48
24	Site Plan: Contemporary Art Museum at Fort Scott (Former Building 3187 Site).....	49

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25	Alternative 4: Status Quo .....	50
26	Existing Building Use.....	57
27	Study Intersections .....	71
28	Area of Potential Effects .....	129
29	Changes to the Landscape Since 1994 .....	131
30	Changes to the Built Environment Since 1994.....	132
31	Predicted Archaeological Features of the NHLD (1993) .....	160
32	Key Map of Views .....	175
33	Alternative 1: View from North End of Old Parade Looking South .....	177
34	Alternative 1: View from Porch of Building 210 Looking South .....	178
35	Alternative 1: View from Building 102 Looking Southeast.....	180
36	Alternative 1: View from Building 50 Looking Northwest.....	181
37	Alternative 2: View from North End of Old Parade Looking South .....	183
38	Alternative 2: View from Porch of Building 210 Looking South .....	184
39	Alternative 2: View from Building 102 Looking Southeast.....	185
40	Alternative 2: View from Building 50 Looking Northwest.....	187
41	Alternative 2A: View from Porch of Building 210 Looking South .....	189
42	Alternative 2A: View from Building 102 Looking Southeast.....	190
43	Alternative 2A: View from Building 50 Looking Northwest.....	191
44	Alternative 3: View from Porch of Building 210 Looking South .....	193
45	Alternative 3: View from Building 102 Looking Southeast.....	194
46	Alternative 3: View from Building 50 Looking Northwest.....	195
47	Alternative 3: View of Fort Scott .....	197
48	Cumulative Actions .....	220

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# Summary

The Presidio Trust (Trust) is proposing to update the planning concept for the 120-acre Main Post district described in the 2002 Presidio Trust Management Plan (PTMP).<sup>1</sup> The updated planning concept (proposed action) will take into account several proposals that were not within the scope of the final PTMP Environmental Impact Statement (EIS), and therefore warrant a supplemental EIS. These proposals include new buildings for a major cultural institution and a lodge. Additional changes and refinements to the planning concept for the Main Post that would bear on the impact analysis in the final PTMP EIS are also being considered, including total building areas, additional new demolition and construction, and parking and circulation improvements.

## Need for the Proposed Action

In 2002, the PTMP presented a vision of the Main Post, once the ceremonial and administrative center for a military community, as “a focal point for visitor orientation and a community center.”<sup>2</sup> Now, in 2008, the Trust is bringing more specificity to that vision by identifying land uses and improvements to the district that would establish the Main

Post as the cultural and civic center of a unique urban national park. Consistent with this goal, the Trust has solicited interest in locating a cultural institution of distinction on a site south of the Main Parade and in three of the Montgomery Street Barracks. The Trust believes that cultural institutions are appropriate in the Main Post, and that they will animate its open spaces, and bring people to the park. The Trust is also proposing to build a stand-alone 125-room lodging facility within the district to enhance the visitor experience of the Presidio, and develop a program to interpret and celebrate the Presidio’s history. As requested by the public, these proposals are being incorporated into an updated planning concept for the Main Post that should achieve the following objectives to the extent reasonably possible:<sup>3</sup>

<sup>1</sup> *The PTMP, adopted in August 2002, is the Trust’s comprehensive land use plan, policy framework, and established management direction for Area B of the Presidio.*

<sup>2</sup> *PTMP, page 62.*

<sup>3</sup> *Certain proposals are proceeding outside the PTMP Main Post Update SEIS process, including the Walt Disney Family Museum (buildings 104, 108, and 122), the International Center to End Violence (building 100), upper Tennessee Hollow revitalization, and the Main Parade rehabilitation. In each case, an Environmental Assessment (EA) was prepared, followed by a Finding of No Significant Impact (FONSI). In each case, the Trust also found that those proposals were consistent with the PTMP, were independently justified, did not have significant environmental impacts, and would not prejudice other decisions on the Main Post. Nonetheless, the cumulative impacts of these and other reasonably foreseeable proposals at or near the Main Post (such as reconstruction of Doyle Drive) are being assessed in this SEIS as cumulative actions.*

- Maintain the Main Post as the heart of the Presidio through rehabilitation, reuse and interpretation of historic buildings, formal historic landscapes, and natural and archaeological resources. Create a lively pedestrian district and central arrival area for visitors.
- Augment ongoing cultural programs at the Main Post by developing partnerships with sponsoring organizations that can help the Trust achieve its program objectives. Collaborate to interpret the stories of the Presidio, contributing to the preservation of the park by deepening the public’s understanding of the park’s resources and history.
- Preserve and refine open spaces at the Main Post by “greening” the Main Parade and commemorating the original El Presidio to create a new focus for a variety of visitor activities, to elevate the Presidio’s important history, and to transform the quality of the open spaces.
- Consider removing and/or replacing buildings at the Main Post as a management option in the administration of the Presidio.
- Consider undertaking new construction at the Main Post to encourage reuse of historic buildings, reinforce historic character-defining features, and/or provide a rich visitor experience.
- Ensure that new construction at the Main Post is sited and configured to be compatible with the National Historic Landmark District.
- Select museum locations, whether on the Main Post or elsewhere in the Presidio, that best serve the goals of the Presidio Trust Act and the PTMP.

- Select lodging locations, whether on the Main Post or elsewhere in the Presidio, that would best serve the goals of the Presidio Trust Act and the PTMP.

## Alternatives

This supplemental EIS (SEIS) evaluates five alternatives, including the proposed action, which were developed and modified with the benefit of public input. The alternatives propose different building uses, and different amounts of demolition, maximum new construction and total building areas for the Main Post. The alternatives are summarized in Table 1 and briefly described below.

### ALTERNATIVE 1: PTMP VISITOR AND COMMUNITY CENTER

This alternative represents the Final Plan Alternative that was analyzed in the final PTMP EIS. It also reflects progress made in implementing the PTMP since the plan was adopted in 2002. The alternative would rehabilitate and reuse buildings within the Main Post consistent with land use assumptions in the final PTMP EIS. Alternative 1 is the required NEPA “no action” alternative which serves as a benchmark for comparison among alternatives and allows the public to understand the extent to which other alternatives are consistent with the PTMP. Under this alternative, the Main Post would become the heart of the Presidio. The district would be a focal point for visitor orientation as well as a

## 1 SUMMARY OF ALTERNATIVES

	<i>Alternative 1: PTMP Visitor and Community Center</i>	<i>Alternative 2: Culture and Heritage Center (Proposed Action)</i>	<i>Alternative 2A: Culture and Heritage Center w/ Modifications</i>	<i>Alternative 3: History Center</i>	<i>Alternative 4: Status Quo</i>
EXISTING TOTAL BUILDING AREA (square feet)	1,148,000	1,148,000	1,148,000	1,148,000	1,148,000
MAXIMUM BUILDING AREA (square feet)	1,212,000	1,289,000 <sup>1</sup>	1,273,000 <sup>1</sup>	1,161,000	1,140,000
MAXIMUM DEMOLITION (square feet)	46,000	145,000	161,000	64,000	34,000
MAXIMUM NEW CONSTRUCTION (square feet)	110,000	265,000	265,000	77,000	26,000
VISITOR-SERVING USES (square feet)	406,000	600,000	600,000	383,000	275,000
ANNUAL VISITORS (millions)	2.0 - 2.2	2.2 - 2.4	2.2 - 2.4	1.7 - 2.0	1.5 - 1.8
PARKING SPACES	± 2,110	± 2,085-2,175	± 2,100-2,180	± 1,890	± 1,965
KEY PROPOSALS	Contemporary Art Museum at Commissary, Lodging at Pershing Hall	Contemporary Art Museum South of Main Parade and in Building 101, Lodging at Building 34 Site and Pershing Hall, Orientation Center at Officers' Club	Same as Alternative 2 except Contemporary Art Museum North of Infantry Terrace and Restaurant along Anza Esplanade	History Center South of Main Parade, Lodging at Pershing Hall & B&B Inns in upper Funston Avenue Officers' Quarters, Contemporary Art Museum at Fort Scott	None

<sup>1</sup> Maximum building area would be 21,000 square feet less should the YMCA relocate outside the Main Post.

community center where people live, work, and enjoy themselves. The district's rich collection of historic buildings and formal landscapes would be preserved to serve as the backdrop for visitor programs and a setting for businesses, organizations, and Presidio community services. The historic Main Parade would be reestablished and other outdoor spaces rehabilitated. Historic El Presidio, the original Spanish garrison at the heart of the district, would be commemorated to create a new focus for a variety of visitor activities, although parking would be maintained at the site. The district would be a mixed-use area, enhanced through special events, exhibitions and programs. The rehabilitated Commissary at Crissy Field (Area B) would be the preferred location for an art museum.

#### **ALTERNATIVE 2: CULTURE AND HERITAGE CENTER (PROPOSED ACTION)**

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This alternative was developed in response to a number of proposals that are being considered for the Main Post that were not foreseen when the PTMP was completed in 2002, including the freestanding lodge and contemporary art museum buildings. Under this alternative, the Main Post would be a heritage site and a center for culture and history. As such, the district would establish the Presidio as a national and international cultural destination, and serve as its major point of entry for visitors. The contemporary art museum south of the Main Parade (on the site of the bowling center, tennis court and Red Cross building) and in building 101 would showcase a preeminent collection of contemporary art and would include a major education program. The lodge between the Old Parade and Main Parade would be a welcoming place for all visitors and would complement public use and activity in the Main Post.

The Main Post's rich collection of cultural, historical and educational institutions and public programs would include an orientation center and archaeology center in building 50, as well as a contemporary art museum. Interpretive and educational programs would be focused on the Presidio and its ongoing role in the evolution of the American West. The orientation center at the Officers' Club would prepare visitors for their visit, whether it is heritage-focused or more general. The archaeology center would allow students and visitors to learn about archaeology and the remains of El Presidio. The Main Post buildings and landscapes would be rehabilitated to protect their historic character, and their significance would be interpreted. The amount of demolition and new construction in the district would be increased to accommodate the uses being proposed, revitalize its historic character as a lively place, activate its open spaces, and reestablish missing elements of the cultural landscape.

#### **ALTERNATIVE 2A: CULTURE AND HERITAGE CENTER WITH MODIFICATIONS**

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This "option" under Alternative 2 was developed in part to respond to several comments received during scoping for the SEIS. Alternative 2A encompasses the same actions as in Alternative 2, except that 1) the site for the contemporary art museum would be north of Infantry Terrace, and rehabilitating building 101 would not be included in the proposal; and 2) the height of the southernmost lodge building between the Old Parade and Main Parade would be reduced to two stories, and a new freestanding restaurant would be constructed along the Anza Esplanade across from the lodge to activate the public space. Relocating the contemporary art museum to the north of Infantry Terrace location would

require the demolition of existing buildings at the site, including the Herbst International Exhibition Hall, the adult day health care center, and the child care center (which could be relocated to an existing building elsewhere on the Presidio). The bowling center and adjacent tennis court would also be demolished (as in Alternative 2) and replaced by a plaza. The Red Cross building would remain.

### ALTERNATIVE 3: HISTORY CENTER

This alternative is derived from a proposal submitted by the Presidio Historical Association for a history center at the Golden Gate. Under this alternative, the Main Post would be transformed into a “must-see destination for Bay Area families and visitors” and “a much-needed place where history can be attractively and effectively offered to the public.” A new history center south of the Main Parade (on the site of the bowling center and adjacent tennis court) would be the primary interpretive facility, serving as both “an anchor and a portal” to receive and orient visitors to the historic Main Post. The district’s collection of buildings would be “well preserved” and reused to present a coherent historical picture of the Presidio and tell the stories of the Presidio’s past. Parking would be removed from El Presidio to allow for more interpretive opportunities. Tenants would be selected over the long term based on their ability to support park programs and activities and retain the district’s sense of community and the past. A new building at Fort Scott would be the preferred location for the contemporary art museum.

### ALTERNATIVE 4: STATUS QUO

This alternative was developed at the request of several commentors during scoping of the SEIS and represents a pragmatic management

direction for the Main Post. Under this alternative, none of the proposals analyzed in the final PTMP EIS or being contemplated under this SEIS would be implemented now or in the future. No significant park enhancements or physical change beyond that already permitted or underway would occur in the district. There would be fewer visitor-serving uses and less cultural/educational space compared to other alternatives. Site improvements would be limited to those undertaken as part of other ongoing plans (except the PTMP), programs or projects, such as the Main Parade, the Walt Disney Family Museum, Tennessee Hollow, Presidio trails and bikeways, and Doyle Drive. Special events would be held periodically, but would not increase above current levels.

## Areas of Controversy

The proposed action has received widespread media attention and has generated substantial interest. The following issues surrounding the proposed action that were raised during scoping may not constitute environmentally significant effects in themselves but could be considered as among the more controversial. Responses to these and all other substantive issues identified during the scoping process are provided in Section 4, Public Involvement and Consultation.

### NEPA PROCESS

Several organizations and individuals question why the Trust is initiating the NEPA process at the same time negotiations are occurring with selected proponents, rather than waiting for the analysis that would support a finding for the preferred alternative. “We realize that doing

them together allows initiation of the project six to nine months faster than if the selection and negotiation were to wait for the completion of the SEIS. However, weighed against this urgency to initiate a major project in the National Park, is the strong appearance of a foregone conclusion.” “How can the Trust select a proposal for negotiation before concluding the important review of impacts from alternative sizes, purposes, appearances and locations? Negotiations would take place in a vacuum.” They note that the process of entering into exclusive negotiations prior to completion of an environmental analysis is not unprecedented. However, they warn that the circumstances preceding the SEIS will require extra attention to due process and transparency to avoid the impression that the contemporary art museum is a “done deal.” They remain concerned that the issuance of the Request for Proposals (RFP) for a cultural institution at the Main Post might be seen as an attempt to exclude proposals and alternative sites that may be more consistent with the PTMP and the National Historic Landmark District (NHLD). Several trust that negotiations do not presuppose the outcome of the NEPA process, but are being undertaken with an openness to work with the public in order to resolve underlying issues.

#### SCALE OF NEW CONSTRUCTION AND IMPACTS ON THE NHLD

Various members of the public oppose the scale of new construction that is being proposed at the Main Post, which they believe would harm the historic character and integrity of the Presidio NHLD. Many are particularly “alarmed” by the placement of the contemporary art museum south of the Main Parade, referring to the site as “the historic heart and soul” of the NHLD. They note that the development of a facility of the size being proposed anywhere in the Presidio would require extensive

planning and design oversight, and have little doubt that another location less central to the historic character of the Presidio could provide greater design freedom. A number of commentors point to reuse of the Commissary at Crissy Field (Area B) as a desirable alternative that minimizes new construction in favor of rehabilitation. Others support an alternative that locates the contemporary art museum north of Infantry Terrace “leaving the Officers’ Club in a more observable and prominent part of the Parade Ground complex.” Supporters of this location believe that the north of Infantry Terrace site has many of the benefits of the currently preferred site, but that new construction there would be much less visually intrusive on the historic core of the Main Post.

#### VISITATION AND TRAFFIC AND PARKING CONGESTION

Neighborhood organizations fear that the combination of proposed uses would attract too many visitors to the Main Post, increasing congestion and traffic throughout their neighborhoods. They are particularly concerned that “blockbuster” exhibits at the contemporary art museum from time to time would “overwhelm” the Main Post and surrounding neighborhoods. Several commentors worry that the contemporary art museum would receive worldwide recognition and interest in a city that is already one of the major tourist destinations in the world. “Do not underestimate the impact such a development will engender.” They and others ask the Trust to thoroughly assess traffic impacts on surrounding city streets within a minimum ¼-mile radius of each park gate. They also ask for adequate parking to satisfy demand in the form of a plan and comprehensive mitigation of negative impacts: “the Trust cannot just simply wish it away by not providing adequate facilities.” And: “the placement of a small parking garage under the building, identifying small

Pods of parking spaces scattered around the area for the visiting public to locate without driving endlessly around in search of them, busing visitors from a remote location, and improving traffic signage would be little more than band-aid solutions.”

#### POTENTIAL LOSS OF BOWLING CENTER AND TENNIS COURT

Many commentators are opposed to the potential loss of the bowling center and adjacent tennis court. Commentors note that the facilities are valuable recreational resources that should not be lost at the Presidio. Others lament that the closure of the bowling center would affect many segments of the community and leave just 12 lanes of bowling remaining within the city. They ask whether these uses would be relocated, and if so, where.

### Major Conclusions

#### LAND USE

The general pattern of land use within the Main Post district would not change under the proposed action or the alternatives. Under the proposed action, a maximum of 18 buildings or 145,000 square feet would be removed, and approximately 265,000 square feet of new construction would be allowed, resulting in a net increase of total building square footage of about 12 percent, to approximately 1.289 million square feet. The proposed action would provide more lodging/conference and cultural facilities than other alternatives, due mainly to the lodge and contemporary art museum proposals. Compared

to Alternative 1, lodging/conference use would more than double and cultural/educational building square footage would increase by about a third. Both uses would attract more visitors.

The contemporary art museum (Alternative 2) or the history center (Alternative 3) on the proposed development site south of the Main Parade would introduce a new cultural use in a new building housing the facility. The new use would have a substantial impact upon the existing nature and character of the site but would not divide the physical arrangement of the block or surrounding area. Rather, the new building would be constructed within the existing block boundary and reinforce the edge of the Main Parade. The square footage of buildings at the site would increase by between 32,000 (history center) and 84,000 square feet (contemporary art museum) and the maximum height would increase from 28 feet to approximately 45 feet (contemporary art museum). The building and site changes to accommodate the new use would be planned and completed consistent with site-specific Design Guidelines in the Main Post Update.

Under the proposed action and Alternative 2A, the change in land use on the proposed lodge development site (from office to lodging) would be compatible with existing uses. Surrounding (primarily office) uses and activities would continue on their own sites and would interrelate with each other as they do at present, without substantial disruption from the proposed lodge. The proposed lodge would be 16 feet taller than the building it replaces (building 34); however, the height of the building would be within the maximum height limit of 45 feet. The materials, color, pattern and configuration of the infill construction would be compatible with the character of the adjacent buildings, and consistent with the Design Guidelines in the Main Post Update.

The addition to the theatre (building 99) under Alternatives 1, 2, and 2A would preserve the building's function in a manner consistent with its original use and location. The addition to the building would complement the existing structure and serve the expanded program. The addition would respect the scale and character of surrounding buildings, and also be consistent with the varied size, structures and mixed land use character of the Main Post district and the Design Guidelines in the Main Post Update.

None of the offsite proposals being considered under the proposed action or alternatives, including a contemporary art museum at the Commissary at Crissy Field (Area B) (Alternative 1) or at Fort Scott (Alternative 3), would introduce a new or incompatible land use to the districts under consideration. No foreseeable land use conflicts would result.

#### CONSISTENCY WITH THE PRESIDIO TRUST MANAGEMENT PLAN

The PTMP is the Trust's formally adopted statement of land use policy. The PTMP provides an interrelated set of planning principles and policies that, taken together, guide the Trust's decision-making and actions. The PTMP is intended to be programmatic, rather than prescriptive, to allow consideration of alternative or changed uses, when appropriate. Under the proposed action (Alternative 2), planned new structures and building additions would exceed the PTMP's maximum permitted building area at the Main Post (1.240 million square feet) by up to 49,000 square feet (to 1.289 million square feet). The PTMP's maximum new construction (110,000 square feet) would be exceeded by up to 155,000 square feet. The Trust would maintain the overall planned reduction of 5.6 million square feet (Presidio-wide) to meet the quantitative goal established in the PTMP, and would amend the PTMP

(as foreseen in the Plan as individual projects are implemented) to reflect the building square footage increase at the Main Post, and to bring the PTMP into conformity with the proposals implementing the proposed action or alternatives.

The proposed action and the alternatives would preserve the Presidio's National Historic Landmark status. Proposed changes at the Main Post under all the alternatives would comply with the National Historic Preservation Act and be compatible with the park's setting. While new construction and demolition of historic buildings would exceed limits established for the Main Post, construction would occur in developed areas, would replace building space in proposed locations or from elsewhere (as permitted under the PTMP), and would be compatible with existing structures. Through the environmental review process, the Trust would find "compelling reasons" for allowing building removal or new construction, and is engaging in public review before making any decision to proceed with specific proposals to remove historic buildings or to construct new buildings.

Several of the alternatives would be inconsistent with the PTMP's assurances that new construction would only be undertaken to encourage reuse of historic buildings (Alternatives 2A and 3), and that public uses, such as the contemporary art museum, history center or lodge, would be located in existing structures (Alternatives 2, 2A, and 3). Should the bowling center and tennis court (under Alternatives 2, 2A, and 3) not be relocated, the alternatives would be inconsistent with the Trust's commitment to retain facilities for active recreational use. The contemporary art museum at the proposed location under Alternative 2A may also conflict with the PTMP planning assumption that the child care

center at the Main Post would continue to operate if it were to be relocated elsewhere within the Presidio.

Alternative 4 would not advance the PTMP goal to preserve and enhance park resources, nor support the Plan's requirement to provide for the Presidio's long-term management and care.

## TRANSPORTATION AND PARKING

The amount of traffic in the Presidio is affected by projects inside the park, as well as trends in regional traffic patterns. Despite growth in the Presidio's population, total traffic volumes through the nearby gates during the peak commute periods have not changed drastically over the past eight years. Notwithstanding several new tenants in the Presidio between 2000 and 2005, the total PM peak hour gate counts in October 2005 were only slightly higher than those collected in 2000. After adjustments to account for seasonal variation, PM peak hour gate counts in January 2008 were comparable to those collected in October 2005.

Since the release of the final PTMP EIS in 2002, the San Francisco County Transportation Authority (SFCTA) model has been updated for the horizon year 2030 as part of the ongoing studies conducted for the Doyle Drive EIS/R. The more recent model data reflect updates in Association of Bay Area Governments (ABAG) regional employment and population forecasts as well as the effect of the replacement of the current Doyle Drive structure.

The analysis of transportation conditions on the Main Post is based on travel demand for specific, more defined uses (e.g., museums, theatre, YMCA fitness center, or recently approved projects) instead of the more general travel demand assumptions in the final PTMP EIS. Trip

generation data for the Letterman Digital Arts Center were updated from the digital office use assumed in the final Letterman Complex EIS and final PTMP EIS to reflect subleases for restaurant and office space. Similarly, trip generation information was updated for other parts of the Presidio for which better, more specific information is now available, such as the restaurant on Rucker Street, upcoming projects in the Thornburg (west Letterman) district and projects at the western end of Crissy Field (Area B).

The geographic distribution of trips would vary somewhat among alternatives. Under Alternatives 2 and 2A, the contemporary art museum and lodge suggest a greater percentage of visitors would be from outside the San Francisco Bay Area. Alternative 1 would have a greater proportion of housing and Alternative 4 would have a greater proportion of office space, and therefore these alternatives would generate more local trips.

Alternative 2 would generate more traffic than Alternative 1, and Alternatives 3 and 4 would generate less traffic than anticipated in the final PTMP EIS. Nevertheless, the number of key intersections expected to operate unacceptably is similar with all alternatives. The intersections expected to operate at LOS E or F could be mitigated to LOS D or better with the mitigation measures identified in the final PTMP EIS or the measures identified in this SEIS.

Approximately half of the 2,200 existing parking spaces on the Main Post are currently occupied on any given weekday. The need for parking would increase with any alternative, resulting in a peak-period parking demand of 2,020 to 2,350 spaces, depending on the alternative. The number of underground spaces needed to accommodate demand during

the peak period would range from 165 spaces with Alternative 2 (if the Presidio Community YMCA chooses to locate its fitness center out of the district) to 490 spaces with Alternative 2A. Through the use of parking time restrictions and a geographically based fee strategy, parking spaces would be managed to preserve the most convenient and proximate parking for visitors. Employees parking for a longer duration would use more distant parking areas and walk 5 to 10 minutes to their workplace.

Ridership on the PresidiGo Downtown shuttle continues to increase, and capacity has been added to keep pace with demand. Regardless of the selected alternative, transit ridership on Muni and Golden Gate Transit would also increase in coming years, and increased service frequency on Muni routes serving the Presidio would be needed to accommodate the anticipated demand. As Muni undertakes radical systemic changes (which at the moment include proposed reductions in service to the Presidio) to improve service reliability and efficiency as part of the Transit Effectiveness Project, the Trust would work with Muni to maintain transit service in the Presidio and improve connections between PresidiGo and Muni.

## AIR QUALITY

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The Bay Area Air Quality Management District (BAAQMD) is the primary agency responsible for managing compliance with the ambient air quality standards. The State Implementation Plan (SIP) and the Clean Air Plan (CAP) identify the steps that must be taken to attain and maintain the state and federal standards, and local jurisdictions can cooperate with these efforts by implementing transportation control measures to reduce emissions from motor vehicles. The Trust's

transportation demand management (TDM) program implements the relevant transportation control measures consistent with these plans.

The proposed action and the alternatives would affect air quality because construction and demolition activities cause emissions from heavy equipment and dust and the demand for transportation causes emissions from mobile sources. No notable stationary sources of air emissions would be within the Main Post district, other than small heaters or boilers that are exempt from permitting requirements. Motor vehicle trips for development under the PTMP (Alternative 1) would cause significant emissions in the regional context, but the effects of the emissions would be adequately reduced by maintaining consistency with the regional Clean Air Plan. Continued implementation of the Trust's TDM program would ensure consistency with the CAP, and conformity with the SIP would be ensured because of the relatively small scale of the proposed demolition and construction activities. Tenants in nearby adult day health care or child care facilities would be sensitive to air quality impacts during construction and demolition activities for the proposed lodge and contemporary art museum (under Alternatives 2 and 2A) or history center (under Alternative 3). Feasible BAAQMD-recommended control measures for fugitive dust particulate matter would limit adverse effects during demolition and construction activities, and additional EPA-recommended measures would control construction equipment exhaust.

Global climate change is influenced by greenhouse gas (GHG) emissions, including carbon dioxide, which occurs with combustion of fossil fuels. The state has identified strategies for managing GHG emissions in California. The Trust would meet state climate change emission reduction targets and would collect emissions data under a voluntary reporting program. To accomplish this, the Trust would

become a member of the Climate Friendly Parks Program, under which it would develop an inventory of park-based greenhouse gas emissions, identify and implement sustainable strategies to mitigate these emissions and adapt to climate change impacts, and educate the public about these efforts.

## NOISE

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The Main Post is exposed to existing traffic noise, most notably within 200 feet of U.S. Highway 101 (Doyle Drive), where levels are commonly above 67 dBA (A-weighted decibels). These existing levels exceed the Federal Highway Administration (FHWA) Noise Abatement Criterion for recreation areas, parks, residences, hotels, and schools. Additionally, noise levels above 67 dBA occasionally occur adjacent to some of the primary internal roadways of the Presidio (Presidio Boulevard, Moraga Avenue, Sheridan Avenue, and Lincoln Boulevard).

The proposed action and alternatives would cause construction/demolition noise and increased traffic noise on the Main Post. Construction and demolition contractors and other equipment operators would comply with the San Francisco Noise Ordinance and Trust-enforced noise standards (Mitigation Measure NR-23 General Construction/Demolition Noise) to minimize noise disturbance. Traffic generated by the alternatives would cause existing noise-sensitive uses to experience increased noise internal to the Presidio. Traffic associated with development under the PTMP (Alternative 1) would be noticeable at the Riley Avenue housing. Traffic noise reduction measures and noise monitoring would be enforced to reduce the impact. The proposed action or alternatives would not cause a noticeable change (greater than 3 dBA) when compared to the traffic noise that would occur under the PTMP.

Traffic noise would adversely affect the contemporary art museum, lodge, theatre, and cultural/educational uses (under Alternatives 2 and 2A) and the history center (under Alternative 3) because these would be new noise-sensitive uses on the Main Post. However, the current practice of enforcing noise insulation requirements would provide acceptable interior noise levels. Tenants and visitors to the contemporary art museum and lodge buildings at Crissy Field (Area B) (under Alternative 1) would also be shielded from excessive Doyle Drive traffic noise through the use of noise insulation and standard building materials.

## HISTORIC RESOURCES

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The Main Post includes buildings, landscapes, objects, and archaeological sites that represent every epoch of development from the entire long period of significance of the Presidio (1776 through 1945). Although significant changes were made after 1945, the Main Post retained enough historic integrity to be listed as a contributing component to the NHLD when the Landmark form was updated in 1993. Impacts on that integrity vary among the alternatives depending on actions proposed.

All alternatives anticipate adaptive use and rehabilitation of historic buildings. Both the proposed action and Alternative 2A assume full occupancy and rehabilitation within five years and thus a shorter time frame for implementing rehabilitation. Under Alternative 2A, however, rehabilitation of building 101 would be dependent on a separate leasing action rather than as part of the contemporary art museum. Alternatives 1 and 3 assume a longer time frame for rehabilitation, with full occupancy by the year 2020. Alternative 4 does not establish a date when full occupancy could be accomplished. Under all alternatives,

rehabilitation would meet the Secretary's Standards while providing occupant safety. Although stabilization and routine maintenance measures would be implemented for vacant buildings under Alternatives 1, 3, and 4, rehabilitation of historic buildings within a short time frame would be preferable to ensure long-term preservation of these resources.

All alternatives except Alternative 4 include demolition of historic and non-historic buildings as well as consideration of demolition for which compliance is either currently underway (e.g., the Doyle Drive replacement project) or has been completed. Impacts of alternatives vary according to the amount of proposed demolition (not included in other compliance efforts) as well as impact on the World War II-era component of the Main Post's historic significance. Removal of two historic garages for the enlargement of the Taylor Street parking lot is included in all alternatives except for Alternative 4. Removal of two World War II-era barracks for the commemoration of the El Presidio as well as removal of the historic tennis court is proposed under Alternatives 2, 2A, and 3. Compared to the other alternatives, demolition under the proposed action would have more impact, with removal of eight historic buildings. Since most of the buildings to be demolished are dispersed, their removal would not result in a significant impact to the Main Post. Under Alternative 2, however, the removal of three historic resources in close proximity would change the character of the southwest corner of the Main Post. Alternative 2A and 3 would remove one less historic building – the Red Cross building, which also dates to World War II – and thus would slightly reduce the impact on the Main Post. Alternative 4 would have the least impact, with no demolition proposed beyond that anticipated in other compliance actions.

The proposed action assumes 265,000 square feet of new construction, including the Presidio Theatre addition, a new lodge, and a new contemporary art museum. Due to the size, scale, and location, proposed new construction under the proposed action would have a significant impact on the Main Post and possibly the NHLD. Alternative 3 would also have an adverse impact, with a proposed total of 77,000 square feet of new construction, most of which would be associated with the proposed history center. The impact of the history center, due to size, scale, and location, would be somewhat mitigated by the fact that no buildings would be proposed for the Graham Street site. Alternative 2A assumes the same amount of new construction associated with the same new facilities as the proposed action, but the alternate location proposed for the contemporary art museum would avoid significant impacts on the Main Post. Alternative 1 proposes 110,000 square feet of new construction, including an addition to the Presidio Theatre and a freestanding new office building on the Graham Street site. New construction under Alternative 1 would conform to the Secretary's Standards and would not significantly impact the Main Post. Alternative 4 does not anticipate new construction beyond that which has already been completed or is underway.

## ARCHAEOLOGY

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The archaeology of the Main Post, with emphasis on El Presidio, would benefit under the proposed action from the presence of the archaeology center, research and education programs, and a new representative landscape that would allow visitors to better understand the Spanish Colonial roots and Mexican heritage of San Francisco. Major proposals,

notably new construction for the lodge and contemporary art museum, however, would result in foreseeable adverse effects as these actions would destroy portions of several archaeological features that contribute to the NHL, including archaeological deposits associated with El Presidio.

In the proposed action, limited parking (up to 75 spaces) and traffic on and through El Presidio would continue to degrade the character of the site and detract from the “sense of place” for the colonial-era site. Open space would be increased in the *plaza de armas* (colonial-era parade ground) through the removal of buildings 40 and 41 (World War II temporary barracks). Graham Street and Moraga Avenue would remain open to through traffic, but the Trust would retain the ability to close these roads for periods of time to allow for excavation, commemoration, and interpretation of El Presidio.

The alternatives to the proposed action, with the exception of Alternative 4, would also establish the archaeology center at El Presidio and commemorate the site in a similar manner as Alternative 2. Parking and traffic would remain on El Presidio in Alternatives 1 and 4, be reduced in 2A (as in Alternative 2), and would be completely removed in Alternative 3. These differences would have direct effects on the capability of the landscape or interpreters to convey to visitors a “sense of place” for the colonial-era resources, with Alternative 3 being most beneficial.

Predicting the amount of disturbance or defining the type of archaeological materials that would be disturbed by new construction under each of the alternatives is problematic, because the exact limits and contents of archaeological features can only be estimated prior to

excavation. Limited testing has confirmed the presence of some of these features and provided depths at which these features would be found. Therefore, recovery plans and further mitigation processes would need to be stipulated in the documents that resolve the Section 106 compliance action. However, the volume of new construction can be used as a likely indicator and proxy measure for estimating the adverse effects on archaeological features listed and mapped in the 1993 NHL update and for comparing the alternatives.

## VISUAL RESOURCES

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The Main Post is visually diverse, with a wide variety of architectural styles and building types from every era of its history. The Main Post also offers commanding views across the district and beyond to the bay. In addition, the steeply sloping southern hillsides known as Infantry Terrace provide a dramatic backdrop to the district and striking contrasts to the formal parade grounds.

Proposed buildings and landscape elements under Alternatives 2, 2A, and 3 would affect the visual character and views at the Main Post. The lodge building in Alternative 2 would partially block panoramic views from the Officers’ Club to the bay. To avoid or lessen these effects, the height of the building would be reduced at its south end to two stories. The lodge building in Alternatives 2 and 2A would block internal east/west views between the Old Parade and the Main Parade. To lessen this effect, transparency would be maintained at the center point of the lodge along Graham Street. In addition, its massing would be divided into four distinct volumes in order to relate to the length of buildings 86 and 87.

The contemporary art museum south of the Main Parade (Alternative 2) would be large but would not be visually dominant when viewed from the foot of the parade ground, even in combination with the proposed lodge. This is because the Montgomery Street Barracks and the Main Parade form a strong visual and spatial unity that can withstand the addition of this new construction. In addition, the rehabilitation of the parade ground would replace acres of paving with lawn and a landscaped edge at the Anza Esplanade that would greatly enhance this view and partially obscure the lodge.

From the southernmost one-third of the Main Parade (in front of building 102), however, the contemporary art museum would dominate the view, creating a strong built southern edge to the Main Parade. It would have an adverse impact insofar as it would partially obscure the planted ridge south of Infantry Terrace and block views to some of the Infantry Terrace residences. While the history center (Alternative 3) would be lower in height than the contemporary art museum, the building would also block views to some of the Infantry Terrace residences, resulting in an unavoidable adverse impact.

The contemporary art museum at the north of Infantry Terrace site (Alternative 2A) would be less visually dominant than the proposed buildings at the south of the Main Parade site (Alternatives 2 and 3) due to the site's distance from the Main Parade. The museum at this location would also avoid blocking views of the planted ridge south of Infantry Terrace.

The contemporary art museum (Alternatives 2 and 2A) or history center (Alternative 3) would be larger than surrounding historic buildings. The buildings as proposed have long expanses of blank walls (due to their

functional requirement as museums), which would be inconsistent with the visual character of the Main Post. To avoid or lessen this effect, the Trust would require modulation of the long elevations, subdivision of the building's mass, and the use of scale-giving architectural elements for the new buildings.

## VISITATION

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The Main Post currently receives approximately 650,000 visitors annually. Visitors to the Main Post and other districts within the Presidio have various expectations and the quality of their different experiences depends on multiple factors, including the quality of the natural, cultural, visual, and recreational resources, as well as other components of the environment. Their experiences are highly individualized, ranging from contemplative to highly social, from independent to directed, from spontaneous to controlled, from easy to challenging, and from more natural to urban. Many visitors are attracted to the district because of its historical significance, and also for programmed uses (exhibitions and special events) and recreation. More than half of the visitor use is associated with the Presidio Community YMCA Fitness Center and the Presidio Bowling Center.

The proposed action and alternatives would increase visitor use, add to the visitor experience offered at the Main Post, and enhance the Main Post's setting for the arts and for historical and cultural programs related to the Presidio. Facilities and services would be expanded and designed to accommodate visitation levels. As buildings are rehabilitated, they would host new park tenants and programs. Improvements to the Main Parade would rehabilitate the existing seven-acre parking lot as the green open space "heart" of the Main Post to accommodate an array of new

public uses, including historical re-enactments, performances, special events, and everyday activities. Pedestrians and bicyclists would find the Main Parade and some streets free of vehicles, and non-vehicle use of these areas would increase. The transit center provides many visitors with an improved sense of arrival to the park (public restrooms, connections to public transit, and information about what to do in the park). The lodge (Alternatives 2 and 2A) would improve visitor services, provide an opportunity for overnight visitor accommodation and ancillary services, and help establish the district as a vibrant visitor destination. The contemporary art museum under the same alternatives would allow museum goers to appreciate and understand history, culture and art of the 20<sup>th</sup> and 21<sup>st</sup> century. The orientation center (Alternatives 1, 2 and 2A) or history center (Alternative 3) would provide opportunities to more deeply engage many park visitors in Presidio history. Programming and tenant selection for the Montgomery Street Barracks (Alternatives 1, 2 and 2A) would locate cultural uses and visitor-serving retail in the ground floors of these buildings. The managed El Presidio site would create a compelling destination for visitors to learn about archaeology and commemorate this cornerstone of this park.

The number of visitors at the Main Post would increase to between 1.6 million (Alternative 4) and 2.4 million (Alternative 2) visitors annually, with peak visitor use occurring primarily on weekend days and holidays. Under the proposed action, approximately 300,000 of these visitors would attend the contemporary art museum, an estimate comparable to the current number of visitors attending the YMCA fitness center and about one-third the annual visitation to the de Young Museum in Golden Gate Park. Implementation of mitigation measures identified in the final

PTMP EIS would protect the diversity of the visitor experience to meet visitor desires (e.g., maintaining opportunities for solitude and for more social experiences), and ensure that visitation levels would not cause unacceptable impacts on park resources. These measures include limitations on visitor opportunities, prohibitions on visitor uses, management controls, conditions for special events, and monitoring of visitor levels to minimize use conflicts.

## RECREATION

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To accommodate the contemporary art museum under Alternatives 2 and 2A or history center under Alternative 3, the existing bowling center and adjacent tennis court would be removed. The bowling center could be relocated to a rehabilitated building at Crissy Field (Area B) subject to a Request for Proposals and the execution of a lease agreement. The tennis court could be relocated elsewhere within the Presidio as funding permits. Should these facilities not be replaced, their removal would have an adverse effect on current users, whose needs would have to be met through other facilities within the park (tennis) or within driving distance outside the Presidio boundaries (bowling).

In accordance with the Trust's vision to maintain or slightly increase the current number of playing fields, the proposed action would include an athletic field near buildings 386 and 387. The site could accommodate either a little league field or two small soccer fields. Additional parking would be provided to support the use.

## WATER RESOURCES

Proposed buildings and parking lots would increase the amount of impervious surface on the Main Post by up to 52,000 square feet (under Alternative 2 assuming rehabilitation of the Main Parade), resulting in a slight increase in stormwater runoff. The existing trunk systems serving the district have sufficient capacity to accommodate the expected flows. Necessary upgrades to the smaller local systems would be installed prior to new construction to correct identified deficiencies and to facilitate connection to new development. Short-term construction activities, such as excavation, grading, and stockpiling of soil, could degrade the quality of surface water. Construction site operators of the larger-scaled projects (such as the Main Parade) would be required to prepare Stormwater Pollution Prevention Plans (SWPPP) that provide for temporary measures to control sediment and other pollutants during construction. Following construction, project proponents would be required to develop and implement Stormwater Control Plans that include post-construction Best Management Practices (BMPs) appropriate for development sites to minimize site imperviousness, control pollutant sources, and incorporate treatment and flow-control facilities that retain, detain, or treat runoff and protect water quality. BMPs that would be used to treat stormwater include infiltration-based features (disconnected downspouts, vegetated swales, bioretention areas, shallow open infiltration area), underground exfiltration trenches, porous pavements, retention and detention ponds, and created wetlands. Structural BMPs such as treatment manholes and oil/water separators would also be used.

New surface parking lots could degrade surface water quality by increasing the concentration of pollutants such as oils, lubricants, grease, sediment, and other pollutants commonly contained in urban runoff

unless properly controlled. Implementation of structural and operational BMPs would control erosion and sediment and manage stormwater from the new lots.

According to geotechnical investigations done near the contemporary art museum and lodge sites proposed by Alternative 2, groundwater is expected to be 50 feet below the ground surface. Below-grade improvements are not expected to extend to this level. The investigations also identified perched groundwater at approximately 26 feet below the ground surface. Depending upon the depth of excavation, improvements at the art museum and lodge sites would likely encounter the perched groundwater. An active dewatering system consisting of a series of watering wells may be necessary during excavation. Any groundwater encountered during construction would be required to meet specified water quality standards before it may be discharged into the sewer system. A permanent active dewatering system would not be required and groundwater would not be restricted from flowing around the below-grade improvements.

## CUMULATIVE IMPACTS

The effects of various past, present, and reasonably foreseeable actions would have a cumulative relationship to the effects of development within the Main Post district under the proposed action or alternatives. These cumulative actions include the past rehabilitation of Crissy Field, current construction of the Walt Disney Family Museum, proposed improvements to the Main Parade, proposed rehabilitation of buildings within the Thornburgh area of West Letterman, most recent development at the Letterman Digital Arts Center, proposed building rehabilitation at the Public Health Service Hospital (PHSH) complex, and proposed

reconstruction of Doyle Drive. Overall, with the exception of cumulative impacts on historic resources and recreation, the incremental adverse effects associated with the proposed action and as well as all other alternatives are not expected to be significant, and resources of concern would not be degraded to unacceptable levels. In several instances, the incremental contribution of the proposed action and alternatives to the cumulative effect on the Main Post and Presidio would be neutral or beneficial. No mitigation measures for cumulative impacts have been identified.

As envisioned in the PTMP, the cumulative actions would concentrate developed areas and intensify current activity levels in the north and northeast portion of the Presidio (including program, community, and commercial facilities). Building space at the Main Post and Letterman districts due to the cumulative actions would increase by a maximum of 159,000 square feet (under Alternative 2) but the overall building area in the Presidio would be maintained at existing levels because of planned demolitions, i.e., the 125,000-square-foot wings of the PHSH (building 1801) and the 145,000 square feet of buildings at the Main Post, including the 32,269 square feet required for replacing Doyle Drive. Accommodating a variety of land uses would result in substantially more open space of higher quality than exists today, with approximately the same overall building square footage in the park.

The increase in the amount of building space would result in the Main Post comprising a large portion of the vehicle trips generated by Area B of the Presidio. These trips, along with projected growth in traffic volumes in the area, would adversely affect the operation of local intersections. Mitigation measures adopted as part of the final PTMP

EIS and measures adopted as part of this SEIS would improve intersection operations to acceptable levels under cumulative conditions.

Improvements to the Main Parade would replace the existing 740-space parking lot with smaller, decentralized parking lots to better serve the Main Post. These decentralized lots would include expansions to existing lots, improvements to the efficiency of layouts in existing lots, and some new parking lots. Existing street parking would be preserved, and new street parking would be added. After the decentralized lots and added street parking are complete, approximately 1,890 to 2,180 parking spaces would remain in the Main Post (excluding Infantry Terrace). Under all alternatives, total parking demand at the Main Post could potentially exceed supply. The Trust would continue to implement components of its existing Transportation Demand Management (TDM) program within the district and throughout the Presidio or adopt more aggressive strategies, such as requiring tenant participation in more TDM program elements, increasing parking fees, and providing more frequent and/or extensive shuttle service to reduce automobile usage and associated parking demand by all tenants, occupants, and visitors.

The introduction of new elements and removal of historic elements concentrated in the northeastern quarter of the Presidio through multiple major projects undertaken since 1994 would change the historic setting and significantly impact the NHLD. Rehabilitation of Crissy Field removed 32 historic buildings to restore missing historic and natural features and to introduce parking for recreational activities, while the Letterman Digital Arts Center replaced non-historic buildings and a large parking lot with compatibly designed new buildings and landscape. Reconstruction of Doyle Drive would further change the landscape by introducing a parkway to replace the historic elevated roadway, by

removing historic buildings and streets, and by moving or changing the appearance of the historic bluff to accommodate the parkway. The proposed action would remove eight historic buildings and structures and add new elements that would change the appearance of the Main Post. All of the actions since 1994 have included measures to either provide compatibility of new design or restore missing or eroded historic features. However, the sum of the cumulative actions, including the proposed action, would significantly alter the appearance of the historic setting of the northeastern quarter of the Presidio from what it was at the end of the period of significance.

The potential loss of three Presidio Community YMCA-administered tennis courts in the Presidio due to construction of the contemporary art museum (Alternatives 2 and 2A) or history center (Alternative 3) and past development of the Letterman Digital Arts Center within the Letterman district would represent a significant decrease in active recreational space at the Presidio, which would have a substantial impact on YMCA tennis facilities and programs. Activities occurring in the city, specifically, the short-term unavailability and long-term reduction of public courts in Golden Gate Park, would incrementally contribute to the cumulative significant impact on existing tennis facilities and programs in the Presidio and San Francisco.

## Issues to be Resolved

The following decisions that are beyond the scope of this draft SEIS must still be made.

## SELECTION OF ACTION FOR IMPLEMENTATION

The proposed action, Alternative 2, identified in this draft SEIS may not be the alternative that is ultimately selected by the Trust for implementation. At this stage, the proposed action reflects the Trust's identified alternative for fulfilling the purpose and need. It also takes into consideration the preference of the proponent for the location of the contemporary art museum. Identification of the proposed action does not indicate a final decision or commitment to approve or execute proposals described in the alternative. The alternative that is ultimately selected by the time the Record of Decision (ROD) is issued will take into account the views of the public and other agencies as provided in comments on the draft SEIS. The selected alternative may combine various elements of the alternatives, or may fall within the range they represent. While the NEPA process is ongoing, no final approvals may be granted and no development agreement or lease may be signed.

## CHOICE OF MITIGATION MEASURES

This draft SEIS discusses the full spectrum of appropriate mitigation measures for each environmental impact, including measures outside the jurisdiction of the Trust. The ROD will identify which mitigation measures will be adopted as a condition of the Trust's approval of the selected action. The ROD will also include a monitoring and enforcement program for each mitigation measure that has been made a condition of project approval. The Trust's Compliance Manager will be responsible for monitoring compliance with the monitoring and enforcement program.

## ASSESSING EFFECTS ON HISTORIC PROPERTIES

The Trust initiated National Historic Preservation Act (NHPA) compliance at the beginning of this draft SEIS process and is undergoing consultation under Section 106 of the NHPA with the California State Historic Preservation Officer, the Advisory Council on Historic Preservation, the National Park Service, the National Trust for Historic Preservation, and the Presidio Historical Association, among other participants. The consultation to date has identified historic properties in an area of potential effects, and has assessed the effects on those historic properties. The consulting agencies will identify ways to address adverse effects in a Memorandum of Agreement that stipulates measures to account for the effects on resources that can be known in advance of proposed work, and an amendment to the Trust's Programmatic Agreement that stipulates the process for addressing effects on resources that cannot be fully identified before work begins (i.e., archaeological resources). Mitigations for the diminishment of the NHL from removal of World War II historic structures and the establishment of a process for involving consulting parties in review of the design for new construction still need to be resolved in the agreements. The consultation will be formalized in four documents: an Identified Historic Properties Report, a Finding of Effect Report, a Memorandum of Agreement, and an amendment to the Programmatic Agreement for archaeological issues.

## REVIEW AND INPUT ON DESIGN OF MUSEUM

During scoping for this draft SEIS, the public expressed great interest in the design of the contemporary art museum, and continuing public discourse on this issue is likely. Refinements to preliminary designs for proposals during the review process, and as a result of final design

development, are expected. The Trust would provide opportunities beyond the NEPA process for public input on the design of the museum and its setting, including a landscape plan, during one or more public workshops, meetings, and other public forums. In addition, the design would be subject to site-specific guidelines being reviewed as part of this SEIS and recommendations made during the Section 106 consultation process. The Trust Board of Directors would review and consider all information received before issuing final approval. Any notable modifications to the building's design would be analyzed to determine whether it would affect information and analysis contained in this SEIS.

## Next Steps

The Trust invites comments on this draft SEIS on or before July 31, 2008. Oral comments on the draft SEIS will be accepted from the public at a Trust Board of Directors meeting on July 14, 2008 beginning at 6:30 PM, at the Officers' Club, 50 Moraga Avenue, on the Main Post in the Presidio. Electronic comments can be sent to [Mainpost@Presidiotrust.gov](mailto:Mainpost@Presidiotrust.gov). Written comments may be faxed to Main Post at (415) 561-5315 or submitted to Main Post, Attn: Compliance Manager, Presidio Trust, 34 Graham Street, P.O. Box 29052, San Francisco, CA 94129-0052.

The Trust will prepare a final SEIS after comments on the draft are received and reviewed. The final SEIS will contain the Trust's responses to all received comments and will be circulated for at least 30 days after filing the final SEIS with the U.S. Environmental Protection Agency. Although there is no requirement for the Trust to respond to comments

received on the final SEIS, the Trust will consider all comments received as part of its decision-making process. The Trust will determine whether the final SEIS meets the standards for EIS adequacy under the NEPA, the Council on Environmental Quality (CEQ) NEPA Regulations, and its own NEPA regulations (36 CFR 1010), and will make its final decision

on the proposed action in a Record of Decision (ROD). The ROD will be a written public record explaining why the Trust has taken a particular course of action. It will allow the Trust to implement the decision, including granting approvals, signing development agreements and leases, and applying adopted mitigation measures.

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# Purpose of and Need for Action

## 1.1 Purpose of Proposed Action

The Presidio Trust (Trust) is updating the planning concept for the Main Post district of the Presidio of San Francisco (Presidio) in order to take into account several proposals that were not fully contemplated in the 2002 Presidio Trust Management Plan (PTMP) and its final Environmental Impact Statement (EIS). The updated planning concept for the Main Post is the proposed action evaluated in this current supplemental EIS (SEIS).

The PTMP envisioned the Main Post as the heart of the Presidio and the “Visitor and Community Center,” and established guidelines for achieving this vision. It could not, however, have anticipated the proposals that are before the Trust and the public today that will contribute significantly to the character of the Main Post. Specifically, the Trust is contemplating building a major cultural institution as well as a lodge. The PTMP anticipated both uses but assumed reuse of existing buildings, a “large museum” at the former Commissary on Crissy Field (Area B), and lodging in historic buildings in the Main Post, Fort Scott, and on Crissy Field (Area B) (Trust 2002a, 2002b).

During the scoping period to develop the NEPA analysis for the cultural institution and the lodge, commenters urged that these proposals, when viewed with other actions in the Main Post and throughout the Presidio, would have cumulatively significant impacts on the environment and

should therefore be addressed in a single EIS (Trust 2007a). The Trust agreed to respond to this public concern and consequently terminated the earlier efforts. The Trust is supplementing the final PTMP EIS in order to take a fresh look at the broader scope, to better meet its NEPA compliance responsibilities, and to more effectively engage the public in its decision-making. The SEIS will provide site-specific environmental analysis for the proposals and will assess the cumulative impacts of all reasonably foreseeable Trust actions at the Presidio that are relevant to the proposed action in the Main Post, including alternatives elsewhere in the Presidio. Finally, and again at the request of the public, the Trust is taking this opportunity to conduct additional site-specific planning at the Main Post. The planning document accompanying this SEIS (Trust 2008a) provides greater specificity to the PTMP and allows public input to help shape the actions that the Trust will take in the near future.

## 1.2 Background

The Trust is the federal agency responsible for the 1,168-acre inland area of the Presidio known as Area B (see map on back cover). The Presidio

is part of the nation's largest and most visited urban national park<sup>4</sup> and the largest active historic preservation project in the country.

The "Defender of the Gate" from 1776 until 1994, the Presidio was a military garrison for almost 220 years. In 1776, the Spanish founded El Presidio to prevent Russia and Britain from establishing a presence on San Francisco Bay. From 1822 to 1835, the Presidio became the northernmost outpost of an independent Mexico, and in 1846, during the Mexican-American War, the U. S. Army took control of the Presidio. Over time, the U.S. Army fortified, developed, and landscaped the Presidio as one of the nation's premier military posts and the center of command in the west.

The Presidio is a showcase of military architecture dating from the 1860s through the Cold War era. It also contains the archaeological remains of El Presidio, the primary resource identified when the Presidio was designated a National Historic Landmark District (NHLD) in 1962. The Presidio contains over 800 buildings, of which 469 are historic and contribute to its status as a NHLD. In addition, the Presidio contains significant cultural landscapes, including a 300-acre historic forest, designed landscape areas, and formal open spaces such as the three parade grounds at the center of the Main Post. These historic elements are complemented by important natural features, spectacular vistas, and recreational opportunities.

In 1994, the U.S. Army departed and the Presidio became a national park. Following the passage of the Presidio Trust Act (P.L. 104-333) in

<sup>4</sup> *An estimated 20 million people visit the Golden Gate National Recreation Area each year.*

1996, the inland 1,168 acres, Area B, came under the jurisdiction of the newly created Presidio Trust.<sup>5</sup> The Trust is a federal agency established by Congress and overseen by a board of directors appointed by the President. The Trust's mission is to preserve and enhance the Presidio as an enduring resource for all Americans. Annual federal appropriations to the Trust diminish each year and will cease at the end of fiscal year 2012. Lease revenues from building reuse will support the long-term operation and maintenance of the park. No other national park is managed in this way.

The Trust was given the necessary flexibility to redevelop and operate the Presidio as a financially self-sustaining national park. The Trust can accept unsolicited proposals, compete opportunities, and make real-time decisions in response to changing conditions. The Trust is unique among federal agencies in that it was intended to be an opportunistic organization so that it could meet the financial challenge of transforming the former military post into a national park and sustain it without ongoing federal appropriations.

In 2002, the Trust adopted the PTMP, which lays out a framework for how the Trust will achieve its mission and finance the park's care. The PTMP sets forth planning concepts and guidelines for each of the Presidio's seven planning districts.<sup>6</sup> The planning concept for the Main Post describes the district's character, land use, and open space, as well

<sup>5</sup> *The 323 coastal acres, Area A, are managed by the National Park Service.*

<sup>6</sup> *The seven planning districts are Main Post, Crissy Field (Area B), Letterman, Fort Scott, Public Health Service Hospital, East Housing, and South Hills.*

as accessibility and circulation. The PTMP envisions the Main Post as the heart of the Presidio and calls for preserving and rehabilitating the Main Post's historic buildings, while allowing some new construction. The PTMP's Main Post planning guidelines address overall spatial organization and land patterns, buildings and structures, open space, vegetation, views, and circulation and access.

In part, because it is in many ways the center of the Presidio, the Main Post has generated considerable public interest and multiple proposals for new uses to be located there. At first the Trust approached each of these as it has other new projects, preparing NEPA documents on the specific proposals, all tiered from the final PTMP EIS. Certain of those proposals have proceeded through the NEPA process to conclusion, including the Walt Disney Family Museum, the International Center to End Violence (building 100), and the Main Parade rehabilitation. In each case an Environmental Assessment (EA) was prepared, followed by a Finding of No Significant Impact (FONSI). In each case the Trust also found that those proposals were consistent with the PTMP, were independently justified, did not have significant environmental impacts, and would not prejudice other decisions on the Main Post. In the two former cases, existing historic buildings along the Montgomery Street Barracks were to be rehabilitated and reused as the PTMP contemplated (building 100 for the International Center to End Violence; building 104 for the Disney Museum, supported by buildings 108 and 122 behind it). The third of the projects for which an EA and FONSI were deemed appropriate was the Main Parade rehabilitation, essentially because the rehabilitation was contemplated in the PTMP, because its focus was on the parade ground itself rather than buildings near it (unlike all other completed or proposed projects), and because there was general public consensus that regardless

of what happened with the building proposals, the rehabilitation of the Main Parade should take place without waiting for the resolution of potentially contentious issues involving new construction elsewhere on the Main Post.

The Trust then initially proceeded to give similar treatment to two other proposals for the Main Post, one for lodging and the other for cultural activities. On November 10, 2006, the Trust initiated public scoping for a Presidio Lodge to be located on the Main Post, commencing an EA process and noting that the PTMP projected the Main Post as a preferred location for a "limited amount of lodging." Four alternative locations, on three sides of the Main Post, were offered for consideration. In response to the Trust's Request for Expressions of Interest (Trust 2006), more than a dozen responses were received. After public workshops and a Request for Proposals (RFP) issued by the Trust (2007b), several teams were invited to submit proposals, of which one was then selected by the Trust as its development partner (Larkspur Hotels & Restaurants 2007). The Trust customarily adopts this process of using an RFP to generate proposals and selecting a development partner (but not selecting a site or design) so that it has one or more concrete, buildable alternatives to analyze in its NEPA process. When the creation of a project is dependent upon the volition and the resources of a private party, the Trust must have a realistic assurance that among all the reasonable alternatives that it analyzes is one or more alternatives that a viable development party proposes to undertake. It makes little sense to focus on alternatives (however theoretically attractive) that nobody proposes to build. As the Council on Environmental Quality (CEQ) has stated in public guidance, "There is . . . no need to disregard the applicant's purposes and needs and the common sense realities of a given situation

in the development of alternatives.”<sup>7</sup> As CEQ put it, “NEPA has never been interpreted to require examination of purely conjectural possibilities whose implementation is deemed remote and speculative. Rather, the agency’s duty is to consider ‘alternatives as they are likely to exist.’”<sup>8</sup>

In August, 2007, the Trust gave public notice that it was going to prepare an EIS for a proposed museum at the Main Post. This was followed by an RFP process (similar to that described for the lodge) that identified three sites on the Main Post, two involving reuse of structures (buildings 103 and 105) along the Montgomery Street Barracks and the third involving new construction to the south of the Main Parade (Trust 2007c). The RFP followed an offer from Doris and Donald Fisher to build a public museum to display their collection of contemporary art, which includes works by such 20th century masters as Andy Warhol and Alexander Calder. Thereafter the RFP was amended to add one more alternative, building 101, also along the Montgomery Street Barracks. In response to the RFP, two proposals (CAMP 2007, Presidio Historical Association *n.d.*) were submitted, one for a museum of contemporary art and one for a history center. The Trust then proceeded to hold a scoping meeting and to receive comments on the then-proposed museum EIS.

After careful consideration of public comments, the Trust terminated the NEPA processes for both the lodge and the contemporary art museum. Instead, the Trust is preparing a more comprehensive document that will supplement the PTMP EIS and assess the cumulative impacts to the

<sup>7</sup> *CEQ Guidance Regarding NEPA Regulations, 48 FR 34263 34267 (July 28, 1983); also see 36 CFR 1010.3 (Trust’s definition of “project applicant”).*

<sup>8</sup> *Id.*

environment of all reasonably foreseeable Trust actions at the Main Post, including site-specific analysis for both the lodge and the contemporary art museum. A scoping meeting was held and scoping comments were invited and received to be used in preparing this SEIS. While, as described above, the focus of this NEPA process had been the Main Post, the inclusion of both the lodging and the contemporary art museum proposals and the requirements that alternative sites be examined and considered led the Trust to expand the scope of this SEIS beyond the confines of the Main Post to include alternative locations elsewhere within the Presidio.

### 1.3 Statement of Need

The Trust is updating the planning concept for the Main Post in order to reflect new proposals and actions that were not within the scope of the final PTMP EIS and to engage the public in decisions about the future of the Main Post. The Trust envisions the Main Post, once the ceremonial and administrative center of an active and dynamic military community, as the cultural and civic center for the Presidio, a unique and dynamic urban national park. The Trust believes that a major cultural institution in the Main Post would serve as a catalyst for attracting other compatible uses to the Main Post’s remaining historic buildings, bring people to the Main Post, and contribute to making the Presidio a great national park. On January 30, 2008, the Trust announced its intention to move forward in discussions with the proponent on the creation of a contemporary art museum at the Presidio (Trust 2008b). The Trust also announced that it would pursue the development of a heritage/orientation center and program to highlight the park’s historic significance. Both of these

concepts have been incorporated into the planning update for the Main Post that forms the basis for the proposed action in this SEIS and is also being reviewed under a parallel National Historic Preservation Act process.

As previously noted, the Trust also solicited interest in developing lodging in the Main Post, and issued a request for expressions of interest on September 26, 2006 and request for proposals on March 12, 2007. The Trust proposes to develop a stand-alone 125-room lodging facility within the district as well as to reuse an historic building (Pershing Hall) as an accompanying lodging facility. Lodging in the Main Post would welcome the public, improve visitor services, provide ancillary services, and help establish the district as a vibrant visitor destination.

Additional changes to the Main Post, including parking and circulation improvements, a management strategy for archaeological resources (El Presidio site) (Trust and NPS 2004), revitalization of the Presidio Theatre and the Montgomery Street Barracks, and potential building construction and demolition, also need to be assessed.

The updated planning concept for the Main Post should achieve the following objectives to the extent reasonably possible. These objectives are derived from Presidio Trust Act findings and planning principles and policies set forth in the PTMP. The objectives will serve as an important guide for future planning and building decisions at the Main Post. The Trust recognizes that any given alternative may not be able to achieve all of these objectives:

- Maintain the Main Post as the heart of the Presidio through rehabilitation, reuse and interpretation of historic buildings, formal historic landscapes, and natural and archaeological resources. Create a lively pedestrian district and central arrival area for Presidio visitors.
- Augment ongoing cultural programs at the Main Post by developing partnerships with sponsoring organizations that can help the Trust achieve its program objectives. Collaborate to interpret the stories of the Presidio, contributing to the preservation of the park by deepening the public’s understanding of the park’s resources and history.
- Preserve and refine open spaces at the Main Post by “greening” the Main Parade and commemorating the original El Presidio to create a new focus for a variety of visitor activities, to elevate the Presidio’s important history, and to transform the quality of the open spaces.
- Consider removing and/or replacing buildings at the Main Post as a management option in the administration of the Presidio.
- Consider undertaking new construction at the Main Post to encourage reuse of historic buildings, reinforce historic character-defining features, and/or provide a rich visitor experience.
- Ensure that new construction at the Main Post is sited and configured to be compatible with the National Historic Landmark district.
- Select museum locations, whether on the Main Post or elsewhere in the Presidio, which best serve the goals of the Presidio Trust Act and the PTMP.
- Select lodging locations, whether on the Main Post or elsewhere in the Presidio, which would best serve the goals of the Presidio Trust Act and the PTMP.

## 1.4 Purpose and Contents of Supplemental Environmental Impact Statement

The Trust has determined that new information of relevance to the Main Post may have a bearing on the action or its impacts identified in PTMP and final PTMP EIS, thereby warranting supplementation within the meaning of the NEPA.<sup>9</sup> The Trust has prepared this SEIS to disclose:

- Alternatives to the action analyzed in the final PTMP EIS
- The environmental impact of the alternatives including the proposed action
- Any adverse environmental impacts that will be unavoidable if the proposed action is implemented
- Appropriate mitigation measures not already included in the final PTMP EIS that could alleviate the environmental effects of the proposed action
- The relationship between local short-term uses of the environment and the maintenance and enhancement of long-term productivity
- Any irreversible and irretrievable commitments of resources resulting from implementation of the newly proposed action

This SEIS tiers<sup>10</sup> from the final PTMP EIS and analyzes planning proposals “not entirely consistent” with the PTMP.<sup>11</sup> In tiering from the

<sup>9</sup> See 40 CFR 1502.9 (supplementation).

<sup>10</sup> 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

(continued)

final PTMP EIS, the SEIS summarizes and incorporates by reference the information and analysis presented in the final PTMP EIS and provides site-specific analysis for the following proposals involving new construction:

- A free-standing lodge on and south of the site of the Presidio Trust Headquarters (building 34)
- A new cultural institution south of the Main Parade
- A building addition to the Presidio Theatre (building 99)

Final PTMP EIS mitigation measures that have been incorporated into the proposals are also discussed.

This SEIS has been formatted in accordance with the CEQ’s NEPA Regulations<sup>12</sup> and the Trust’s policies and procedures on environmental quality and control.<sup>13</sup> The Trust determined the specific contents of the SEIS through the scoping phase of the NEPA process as informed by

*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 final PTMP EIS can be viewed at the Presidio Trust Library or on the Trust’s website at <http://www.presidio.gov/Trust/Documents/EnvironmentalPlans/>.*

<sup>11</sup> The PTMP states that “these proposals will be fully reviewed and considered under the NEPA, including all applicable public processes” (page 136).

<sup>12</sup> See 40 CFR 1502.10 (recommended format).

<sup>13</sup> See 36 CFR 1010.9 (preparation of an EIS).

Presidio Lodge and Presidio Museum scoping.<sup>14</sup> The scoping phase for the SEIS commenced on November 1, 2007 and ended on December 15, 2007. During this time, the Trust established the precise nature and extent of the proposed action, the range of alternatives, the specific impacts to be evaluated, and the methods to be used in their evaluation. The SEIS has been designed for many different readers, with the goal of “good analysis and clear presentation of the alternatives including the proposed action.”<sup>15</sup>

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<sup>14</sup> *Scoping for the Presidio Lodge commenced on November 10, 2006 and ended on February 8, 2007. Scoping for the Presidio Museum began on August 8, 2007 and ended on October 15, 2007. The separate NEPA processes for the Presidio Lodge and Presidio Museum proposals were terminated by way of the notice to prepare this SEIS (Trust 2007a).*

<sup>15</sup> *See 36 CFR 1502.10.*

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