

2. PURPOSE AND NEED

2.1 PLANNING FOR THE PRESIDIO

The legislation that created the Golden Gate National Recreation Area in 1972 included a proviso that would bring the Presidio of San Francisco under the jurisdiction of the National Park Service if it were determined by the Department of Defense to be excess to its needs. The Presidio was listed for closure under the Base Realignment and Closure Act in 1989. Management of the 1,480-acre Presidio was officially transferred from the U.S. Army to the NPS in October 1994, to be managed as part of GGNRA.

The Presidio is currently managed by two agencies: the National Park Service and the Trust. The NPS manages the northern and western perimeter of the Presidio as a portion of GGNRA (Area A of the Presidio). The Trust, established in 1996 by (Public Law 104-333), assumed jurisdiction and management of the remaining 1,168 acres of the Presidio on July 8, 1998 (Area B of the Presidio).

A planning effort to define future use of the Presidio was initiated by GGNRA in the early 1990s. After data gathering, analysis and public input, this effort produced the 1994 Final General Management Plan Amendment (GMPA) for the Presidio that identified objectives, uses and implementation strategies that would guide management and use of this portion of GGNRA.

An Environmental Impact Statement (EIS) was prepared for the GMPA, in compliance with the National Environmental Policy Act (NEPA), which addressed potentially significant impacts from the proposed GMPA and from a range of alternative management plans. Where potentially significant effects were identified, mitigation measures were developed that would effectively reduce the potential impact to a less-than-significant level.

The GMPA (NPS, 1994a) required the preparation of a Presidio forest management plan to reduce the potential for adverse impacts from implementation of the GMPA on the National Historic Landmark District status of the Presidio. The GMPA EIS (NPS, 1994b) also called for the restoration and expansion of native plant communities, protection of all rare plants and plant communities, removal of some areas of forest which have spread from the historic forest boundary, reestablishment of historic vistas, rehabilitation of historic landscape plantings, removal of exotic pest plant species, and protection of important wildlife habitat. A comprehensive Vegetation Management Plan was determined to be the appropriate vehicle for addressing these related programs in the Presidio.

At present, GGNRA and the Trust manage the Presidio in accordance with the GMPA. In 2000, the Trust began a planning effort to update the GMPA for Area B -- the portion of the Presidio within its jurisdiction. This update, the Presidio Trust Implementation Plan (PTIP), will incorporate the VMP by reference (see VMP Section 2-8, Concurrent Plans).

Should the PTIP result in land use changes that indicate the need for an adjustment to vegetation management zoning or treatment recommendations, the VMP would be amended through the PTIP process. Further changes to the VMP zoning would be addressed and reviewed through future site-specific planning, with the appropriate level of historic and environmental review.

2.2 BUILDING ON THE GMPA

The GMPA recognized the Presidio forest as a significant cultural landscape feature, not only of the Presidio but of San Francisco as a whole. The GMPA recognized that the historic forest was aging and in need of rehabilitation and replanting. The extent of the Presidio forest had changed over the past fifty years, spreading beyond the boundaries of the original plantings in some areas and vanishing from others. The GMPA called for the identification of a baseline historic forest boundary that would better define this cultural landscape feature of the Presidio and allow for the re-establishment and more systematic maintenance of historic viewsheds both from within the Presidio and from adjacent neighborhoods.

Due to the clustered development by the U.S. Army, the Presidio still provides habitat for several isolated, remnant native plant communities, such as riparian woodland and coastal scrub, which were formerly widespread throughout San Francisco but are now greatly reduced in acreage. Within these communities are plant species now considered under threat, as evidenced by their listing under the Federal Endangered Species Act or by the more comprehensive lists published by the California Native Plant Society. The GMPA recognized the vital need to provide protection, restoration, and expansion opportunities for these special-status plants and native plant communities.

2.3 NEED FOR THE VEGETATION MANAGEMENT PLAN

The need for a vegetation resource planning document was identified in several mitigation measures in the GMPA EIS (NPS 1994b). The mitigation measures called for a series of park-wide vegetation resource planning efforts that would address the range of vegetation management issues in the Presidio. To be considered effective mitigation, this VMP must not only address potentially adverse impacts that could result from future actions identified in the GMPA (such as the leasing or removal of buildings), but develop an effective park-wide strategy that will improve upon the current condition of vegetation resources in the Presidio. The VMP is based on the following directives from the GMPA:

- Additional research would be conducted to determine the evolution of the forest and its existing conditions, and a forest management plan with an environmental assessment would be prepared to guide future actions. This plan would identify appropriate replacement species, tree stand management options, and exact areas for non-historic forest removal. Historic trees that have become hazardous would be documented for the historic record before removal. (NPS 1994b, p. 29)

- A Presidio-wide inventory and monitoring program for rare and endangered plant and animal species would be established. . . the results of the survey would be used to establish management objectives for each rare and endangered species, including definitions of acceptable population levels in accordance with NPS-77 (NPS 1991). These objectives would stipulate actions and techniques for protection, enhancement and restoration of each species. (NPS 1994b, p. 31)
Preserve the uniqueness and unity of Presidio site features; retain the symbols and traditions that provide a link to its past. (GMPA, p. 33)
- The landscape and historic features that define the site's unique character will be preserved and rehabilitated for park use (NPS 1994a, p. 32).

2.4 PURPOSE OF THE VEGETATION MANAGEMENT PLAN

The purpose of the VMP is to provide a management framework for protecting, enhancing, restoring, and rehabilitating the native and planted vegetation of the Presidio. The VMP will guide the actions affecting the vegetation resources of the Presidio.

The Presidio GMPA delineated "A View of the Future" that mirrors the purposes for which Congress established the Golden Gate National Recreation Area: "the Presidio will have all the exceptional qualities of a traditional national park-- it will be a place for recreation and solitude as well as an urban refuge devoted to the preservation of the extraordinary cultural, natural, and scenic resources that make it one of the most beautiful locations on earth" (NPS 1994a, p. 20). This VMP is a guide for managing the Presidio's natural and cultural vegetation in furtherance of these purposes.

The VMP establishes three broadly defined vegetation management zones for the Presidio, develops goals, objectives, and strategies for each, and defines the baseline extent of the most visible cultural landscape feature of the Presidio - the historic forest. The guidance provided by the VMP would reduce the potential for adverse impacts to park resources and establish a framework for a coordinated management effort in rehabilitating and restoring the native plant, historic forest, and landscaped areas of the park.

The GMPA established 13 planning areas within the Presidio. Taken together, these planning areas contain a balance of developed and open space areas to be managed in ways that are compatible with park purposes and adjacent neighborhood development, and that offer visitors a diversity of experiences and opportunities. One or more of the three categories of Presidio vegetation - native plant communities, historic forest, and landscape vegetation - are present within each of the GMPA planning areas.

2.5 GENERAL MANAGEMENT PLAN AMENDMENT PRIMARY OBJECTIVES

Native Plant Communities

- *Continue the Presidio-wide inventory and monitoring program for rare and endangered plant species and develop management objectives that stipulate actions and techniques for protection, enhancement and restoration of each species.*
- *Protect the remaining native plant communities in the Presidio.*
- *Restore and increase the area of native plant communities in the Presidio. Use local Presidio plants for plantings whenever possible. Replant areas where forest is removed with native vegetation.*

Historic Forest

- *Restore and rehabilitate the historic forest within its historical boundaries, manage it as part of the cultural landscape, and maintain the regional visual quality of the Presidio.*
- *Identify the tree replacement species, tree stand management actions, and areas for non-historic forest removal.*
- *Restore historic vistas and reestablish historic linkages between areas of the Presidio by clearing selected non-historic forested areas.*

Landscape Vegetation

- *Design and site new landscaping elements in keeping with the historic character-defining elements of the National Historic Landmark while allowing changes to occur that will maintain the vitality of the site.*
- *Confine non-native species to those areas where they were historically planted and are considered important to cultural landscape values.*
- *Encourage use of non-invasive, drought-tolerant, low-maintenance landscaping.*

Presidio-Wide Objectives

- *Increase open space to enhance park values and improve the Presidio's natural and recreational qualities.*
- *Identify and protect sensitive wildlife species, and restore and maintain their habitats.*
- *Manage onsite water resources to protect groundwater and surface water resources and natural wetland and riparian values and to efficiently supply water to the Presidio community.*

Sustainable Design and Conservation

- *Adopt the principles of sustainable design and technology when upgrading the built environment.*
- *Promote and demonstrate conservation practices, including energy conservation, water conservation, and waste reduction and recycling. Use reclaimed water wherever possible.*
- *Ensure that the Presidio utilizes integrated pest management control methods and minimizes the use of pesticides and herbicides.*

2.6 PLANNING ISSUES RAISED

The following vegetation management issues were: 1) included in the GMPA or GMPA EIS or both; 2) gathered during public scoping for this VMP; or 3) identified by NPS staff through research for this Vegetation Management Plan. The planning issues demonstrate the broad scope of the VMP and present background information needed to understand the context in which the VMP has been developed.

Impacts to Physical Resources

Soil Erosion Is a Threat to Native Vegetation and the Historic Forest. Visitor foot traffic and improper drainage have resulted in erosion and gullying in several areas. In some forested areas, soil characteristics have changed such that dramatically less water infiltrates into normally porous sand, and rill and gully erosion have occurred. Corrective actions need to be identified and implemented to protect resources and maintain accessibility for urban visitors.

Impacts to Native Plant Communities

Existing Native Plant Communities in the Presidio Require Protection and Enhancement. Native plant communities, rare in San Francisco and found in small areas within the Presidio, are critically threatened by lack of habitat and must be protected.

Rare and Endangered Species Require Protection. Many small natural areas contain populations of rare and endangered species that must be protected and enhanced in order for the rare species to survive.

Native Plant Communities Can Be Expanded. Many opportunities are available in the Presidio to reintroduce native plant communities to areas where non-native plants have become established and where non-historic development would be removed as part of the GMPA.

Introduced Horticultural Plants and Aggressive Non-native Species Require Management. Some non-native plant species can aggressively spread to areas where

they can displace native species or threaten their genetic integrity through cross-pollination.

Impacts to Wildlife Resources

Presidio Plant Communities Provide Important Wildlife Habitat. Vegetation management efforts should avoid impacts to wildlife such as nesting birds or aquatic species in riparian corridors.

Impacts to the Historic Forest and Cultural Resources

The Historic Forest of the Presidio Is in an Advanced Stage of Maturity. As a significant feature of the historic landscape, the forest is a major contributing element to the National Historic Landmark status of the Presidio. The forest is in a state of decline because some tree species are not long-lived, and thinning and other horticultural needs have been neglected. The forest demonstrates reduced vigor, and its composition and visual appearance are changing. Selection of species for replanting and specific forest treatment strategies have generated much public interest and require ongoing assessment and evaluation.

Forest Boundaries Have Shifted Over Time. Trees in the historic forest have reseeded and expanded beyond the original planted areas. Trees have invaded natural areas along the coastal bluffs and in the Inspiration Point area. In other areas, historic plantings have been lost. These areas provide opportunities for restoration of native plant communities, replanting of forest trees or reestablishment of views.

Pest and Disease Potential Requires Evaluation and Monitoring. Pine pitch canker (a fungus) and the eucalyptus longhorn borer (a pest insect) pose potential threats to the Presidio forest. If these pests infect Presidio trees, significant loss of Monterey pine and eucalyptus could occur. An integrated pest management plan may need to be developed if monitoring indicates expansion into the Presidio.

Horticultural Plantings Throughout the Presidio Need to Be Rehabilitated. Non-native horticulture plant species often have historical significance because of their association with past military development and uses. Many of these plants can be successfully confined to developed areas and significantly contribute to the historic and aesthetic value of the Presidio.

Impacts to Visual Resources

Historic Vistas and Valued Views Require Maintenance. Scenic views within the Presidio and adjacent neighborhoods have been obscured by encroaching vegetation and historic visual links have been lost. For example, naturalized forest stands have

encroached on the historic views from Inspiration Point and Rob Hill. Screening of non-historic or undesirable views is needed in other areas.

Tree Topping has Reduced Vigor and Aesthetics Along the Perimeter of the Presidio. The Presidio is bordered on the east and south by residential neighborhoods. Some residences have expansive views of the forest, bay, Golden Gate Bridge, and ocean that become blocked by Presidio tree growth. The Army allowed some residents to periodically top certain tree stands to preserve their views, especially the Monterey cypress from Julius Kahn Playground eastward to Walnut Street. Topping has reduced the vigor and visual appeal of the trees and is not considered an acceptable management practice. Alternative solutions that consider both view protection for residents and visual appearance of the Presidio forest need to be explored.

Impacts to Park Visitors and Park Neighbors

Hazardous Conditions Require Some Tree and Landscape Modification. Landscape trees in poor condition can present hazards from tree fall or limb breakage to Presidio visitors and property. An NPS hazard tree survey (Jones & Stokes Associates, Inc. 1997), which estimates the probability of tree failure and the degree of human and property exposure, found a large number of Presidio trees to be potentially hazardous. Tree hazards require continual reevaluation and frequent treatment.

Cumulative Impacts

Sustainability Issues Must Be Considered. Sustainability and conservation concerns include recycling of plant material, wood utilization, efficient use of natural resources (such as water for plant maintenance), and the longevity and maintenance requirements of plants selected for replacement planting.

The Operation of the Presidio Must Become Self-Sustaining. Management costs and business concerns (such as the attractiveness of the Presidio for building leasing) are major considerations in resource management decisions.

2.7 REGULATORY COMPLIANCE REQUIREMENTS

National Environmental Policy Act (NEPA). As a federal facility, the Presidio is subject to the provisions of NEPA, which require an evaluation of impacts associated with federal actions. This requirement was initially met through the preparation of a Final Environmental Impact Statement (FEIS) on the Presidio GMPA. No new construction or major change in management direction from the GMPA is proposed in this document. Section 4, Description of Project Alternatives, addresses alternative vegetation management options that are within the framework of the guidance set by the GMPA.

The impacts, as outlined in the GMPA EIS and further evaluated here, are generally beneficial for native species and preservation of historic resources. Any modifications to the VMP would be reviewed through the NEPA process, and where relevant to cultural resources, reviewed in accordance with Section 106 of the National Historic Preservation Act.

Endangered Species Act (ESA). As part of the NEPA compliance process, potential impacts to endangered and other special-status species are assessed. Federal agencies are required by the Endangered Species Act of 1973 to consult with the U.S. Fish and Wildlife Service (USFWS) to ensure that their actions do not jeopardize the continued existence of any species listed as an endangered or threatened species or its critical habitat. Consultation with USFWS as required by Section 7 of the Endangered Species Act has been ongoing and maintained on a regular basis by the NPS throughout Presidio planning efforts since 1991. Because threatened and endangered species protection and habitat enhancement are in part the subject of this plan, consultation with USFWS is required. To initiate this process, a letter was sent to USFWS during the scoping phase to inform them of the initiation of this planning process. The USFWS submitted detailed comments on the VMP and EA during the public review period stating that the programmatic VMP did not require USFWS consultation but that subsequent implementation programs affecting federally-listed species should be submitted to the USFWS as required by the ESA. . All management actions by the NPS and the Trust involving federally-listed species will be undertaken in consultation with the USFWS.

National Historic Preservation Act (NHPA). Federal agencies are required to take into account the effects of their actions on properties listed or eligible for listing on the National Register of Historic Places. The Presidio of San Francisco is a National Historic Landmark. Historic buildings, historic landscapes, and archeological resources all contribute to this significant designation. All undertakings with the potential to affect the historic character of the Presidio require Section 106 compliance review (as mandated by the National Historic Preservation Act) to ensure protection of cultural resources. All actions proposed here that would affect cultural resources have been identified in the final GMPA/FEIS and are covered in the Presidio Programmatic Agreement (PA) between the National Park Service, the California State Historic Preservation Officer, and the Advisory Council on Historic Preservation. As specific implementation plans are developed, further review and consultation will be undertaken to assure compliance with Section 106 of the National Historic Preservation Act. All actions and projects that involve ground disturbance and changes to the cultural landscape implemented under the plan will be assessed for conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties according to the requirements of the programmatic agreement for that action or project. Actions and projects that involve ground disturbance will be subject to the provisions of the agencies' PA's addressing archeological monitoring and process initiated if unexpected archeological resources are uncovered.

2.7.1 Related Documents and Plans

Several plans, reports, and documents (in addition to the 1994 GMPA) serve as references for this plan and provide information and guidance for the proposed management actions. The majority of these plans and documents were prepared by or for the NPS and are available for public review at Golden Gate National Recreation Area archives with more recent documents posted on the internet at www.nps.gov/planning/index.htm. Documentation of Trust planning efforts and projects is available for public review at the Trust library, or at www.presidiotrust.gov.

Presidio of San Francisco Natural Resource Inventory and Vegetation Management Options (Jones & Stokes Associates, Inc. 1997). The Vegetation Management Plan relies heavily on this comprehensive natural resource inventory and evaluation that was prepared for the NPS. It is incorporated here by reference and it provides the basis for many of the proposed actions as well as information used in determining environmental impacts. This document includes:

- maps, descriptions, and evaluations of vegetation including prehistoric vegetation, existing native plant communities, special-status species, and historic forest stand composition and extent,
- maps and descriptions of soils, geology, and erosion conditions,
- inventory of wildlife and evaluation of wildlife habitat quality,
- evaluation of scenic vistas and other areas of special management concern,
- options for treatment and maintenance of forest and native vegetation,
- evaluation of hazardous tree conditions and recommendations for treatment, and
- methodology and techniques for tree removal, native plant propagation, site preparation and soil treatment, and plant care and maintenance.

Many of the general concepts and procedures from Jones & Stokes Associates, Inc. (1997) are summarized and presented in this document with sufficient detail to allow environmental impact evaluation.

National Park Service Management Policies (NPS 2001). A management policy document that sets the framework and provides direction for all management decisions within NPS. This document establishes the NPS policies for natural and cultural resource management.

Natural Resources Section of the Resource Management Plan (NPS 1994c). A Resource Management Plan for the entire GGNRA was prepared in 1994. This plan addressed vegetation management issues in project statements that are both specific to the Presidio and common to all areas of the GGNRA. The Natural Resources Management Plan identified the need for additional planning for the Presidio's historic forest and native vegetation restoration. Applicable project statements address control of alien plant species, rare plant management, enhancement of several special-status plant species, restoration and management of grassland habitats, and revegetation and nursery

management.

National Park Service-77, Natural Resource Management Guidelines (NPS 1991) **and NPS-28, Cultural Resource Management Guideline** (NPS 1994d). These service-wide guidelines establish the basic principles and objectives for natural and cultural resource management by NPS and define the steps for developing an ecologically sound and historically sustainable vegetation management program. They provide general guidance for NPS actions under this plan as well as program guidance for future action plans that will address site-specific vegetation management activities.

The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes (NPS 1996a). Areas of important historic vegetation exist in both the NPS and Trust jurisdictions. These guidelines establish an overall historic preservation approach for identifying, preserving, and rehabilitating historic landscapes as well as a philosophical framework from which to operate. Standards provide direction to cultural landscape owners, stewards & managers, landscape architects, preservation planners, architects, engineers, contractors and project reviewers prior to and during planning and implementation of treatment projects.

Guidelines for Rehabilitating Buildings at the Presidio of San Francisco (NPS 1995a) **and Presidio Residential Guidelines** (NPS 1998a). These guidelines were developed to assist the NPS staff, tenants, and design consultants in determining acceptable limits in the rehabilitation of structures and their sites and landscape maintenance.

Crissy Field Plan EA and FONSI (NPS 1996b). A foredune system vegetated with native plants, a 20-acre tidal marsh, a historic airfield and a picnic area were among the features adopted as part of this plan for Crissy Field in the Presidio.

Lobos Creek Dune Restoration Action Plan (NPS 1995b). This dune restoration project was undertaken as mitigation for the Richmond Transport Project. This action plan documents the restoration project for project review.

New Presidio Golf Course Facilities Environmental Assessment (NPS 1996c). Specific planting and design plans for the golf course, clubhouse, and maintenance facilities have been reviewed and evaluated in this document.

Draft Cultural Landscape Analysis and Report (Land and Community Associates 1992 and 1993). A comprehensive cultural landscape database for the Presidio and management recommendations for the character-defining features of the Presidio cultural landscape including buildings, roads, trails, water systems, and vegetation began to be assembled in these draft reports.

Other resource inventories, site-specific plans, and internal reports that relate to vegetation management activities at the Presidio are listed in Section 7, References.

Concurrent Planning Processes

- **Presidio Trust Implementation Plan (PTIP)** . The Trust is conducting a comprehensive planning process to update the 1994 GMPA for Area B, the portion of the Presidio in the jurisdiction of the Trust. The PTIP will retain those portions of the GMPA that have already been implemented or that do not warrant change, and focus on planning concepts that need reviewing due to changed conditions and opportunities since the creation of the Trust. The PTIP incorporates the VMP by reference. To the extent that changes in land use are studied and adopted through the PTIP process and accompanying NEPA review, the PTIP EIS and Record of Decision (ROD) would provide the requisite amendment to the VMP.
- **Presidio Trails and Bikeways Master Plan and EA.** The National Park Service, in collaboration with the Trust, is preparing a Presidio-wide Trails and Bikeways Master Plan to enhance visitor access while protecting the natural and cultural resources of the Presidio. The trail planning process will incorporate the elements of the VMP EA that relate to trails and recreation opportunities. Comments received from the public on the VMP that addressed trails and bikeways issues will be reviewed by the NPS and the Trust in preparing the Trails and Bikeways Plan.
- **Mountain Lake Enhancement Plan and EA.** The Trust has prepared an EA for the Mountain Lake Enhancement Plan, one of few natural lakes in San Francisco. The goals of the project are to improve water quality, enhance habitat and improve public access. The NEPA process is completed, and a FONSI was adopted. The plan is in the early stages of implementation.
- **Tennessee Hollow Riparian Corridor Restoration.** The Trust and the NPS are in the initial data collection stage, subsequent to the restoration planning effort. . **Doyle Drive EIS.** The San Francisco County Transportation Authority (SFCTA) is proposing to replace Doyle Drive, located in the Presidio of San Francisco, within the Golden Gate Recreation Area. Working with the Federal Highway Administration (FHWA), the NPS, the Trust and Caltrans, SFCTA will prepare a joint environmental impact statement/report (EIS/EIR) pursuant to the NEPA and the California Environmental Quality Act for the proposed improvement of Doyle Drive.

2.8 SUMMARY OF THE SCOPING PROCESS

Scoping Process Workshops

A list of issues and general guidelines were presented in a scoping brochure to initiate the planning process for the Presidio Vegetation Management Plan in September 1997. Approximately 1,400 copies were sent to nearby homeowners, neighborhood organizations, current Presidio tenants, representatives of agencies and organizations, and individuals. Many of the addressees were individuals and organizations who had expressed interest in Presidio issues during the planning process for the Presidio GMPA (NPS 1994a).

Public comments were received at two workshops held on September 30 and October 1, 1997, as well as through returned brochures, letters, and e-mail. Over 100 individuals and representatives of organizations responded to the request to provide comments during the scoping phase. These comments, along with resource information and legal and policy requirements, helped shape the management actions, alternatives, and impacts addressed in this VMP. A summary of scoping comments (NPS 1997) was prepared and sent to everyone on the mailing list.

Plan Distribution and Public Comment

After analysis of initial scoping comments and additional public workshops, public presentations on the issues and alternatives were held at meetings of the GGNRA Advisory Commission in 1998 and early 1999, a Public Review Draft Vegetation Management Plan and EA was prepared and released to the public for review on July 1, 1999, initiating the formal public comment period required by NEPA. It was distributed to city, state, and federal agencies and public interest groups, nonprofit organizations and individuals on the project mailing list. The Plan was also presented to a joint GGNRA Advisory Commission and Trust meeting on July 20, 1999, followed by field trips in July, August and October of 1999. Public comment was taken at Advisory Commission Meetings in July, August, September and October and at a public meeting of the Trust Board on November 17, 1999, at the close of the formal comment period.

Plan Adoption

In October 2000, NPS and Trust staff distributed a report to the GGNRA Advisory Commission summarizing and responding to public comment on the draft VMP (1999) and recommending text edits to the VMP. On October 17, 2000, the Advisory Commission passed a resolution recommending that NPS and the Trust adopt the Vegetation Management Plan with the recommended revisions (see VMP FONSI, Modifications to the Selected Alternative). Both entities adopted the VMP and EA in accordance with NEPA by the signing of a Finding of No Significant Impact (FONSI). The FONSI and the revised Final VMP and EA comprise the NEPA record for this action. This revised Final EA incorporates the clarifications and modifications developed in response to comments raised during public review and a complete list of mitigation measures for implementation of the VMP. A joint FONSI was prepared by the NPS (signed by the NPS Pacific Western Regional Director) and by the Trust (signed by the Executive Director). The FONSI addresses in more detail the principal issues raised by public comments, agency response and, where indicated, resultant clarifications and modifications to the VMP EA. It also includes the table of VMP mitigation measures. Adoption of the revised and finalized Final VMP applies to NPS and Trust actions throughout the Presidio, irregardless of which jurisdiction the action occurs. NPS stewardship projects regularly occur in the Trust jurisdiction; Trust crews and equipment often perform utility maintenance projects or assist NPS crews in Area A of the Presidio.

All subsequent site-specific implementation projects for vegetation management in the Presidio will be reviewed for conformance with the Final VMP and EA.