

ENVIRONMENTAL CONSEQUENCES

Cultural Resources

4.2 CULTURAL RESOURCES

This section evaluates potential impacts to historic resources, including the National Historic Landmark District (NHL), and potential impacts to the Presidio cultural landscape, and to archaeological resources within the Presidio. The evaluation methodology, potential impacts for each alternative, and mitigation measures to address potential impacts are discussed.

4.2.1 HISTORIC ARCHITECTURAL RESOURCES AND THE CULTURAL LANDSCAPE

METHODOLOGY

Potential effects on historic architectural resources and the Presidio cultural landscape are assessed in this section by determining the potential for physical changes, including building rehabilitation, landscape changes, building demolition and new construction, under each alternative. For each alternative, the analysis presents a planning district by district discussion of proposed changes including the maximum allowable new construction and demolitions. The effectiveness of the Final Plan's Planning Principles and District Guidelines, and regulatory requirements that would reduce or eliminate potential adverse effects are also described.

Section 110 of the NHPA sets out the broad historic preservation responsibilities of federal agencies to ensure that historic preservation is fully integrated into ongoing programs. Under Section 110(f), special protection is to be afforded to NHLs. Under that provision a federal agency must, "to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm" to a NHL that could be directly and adversely affected by an undertaking such as the proposed plan.

Section 106 of the NHPA requires federal agencies to take into account the effects of their actions on historic properties and to seek comments from an independent reviewing agency, the Advisory Council on Historic Preservation (ACHP). The revised regulations of the ACHP (Title 36 of the Code of Federal Regulations at part 800) provide the methodology for assessing impacts on historic resources and detail the requirements of the consultation

process. When a project is complex and is expected to continue over time, like the Final Plan, the regulations allow development of a Programmatic Agreement that governs ongoing and future activities undertaken as part of the project or plan it addresses. Implementation of the Programmatic Agreement satisfies the agency's obligations under Section 106 and 110(f) of the NHPA (dated March 2002, signed by the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, the National Park Service, and the Presidio Trust, as well as the National Trust for Historic Preservation and Fort Point and Presidio Historical Association. See Appendix D).

Under the Trust Act, the Trust is directed to develop a comprehensive management program to reduce expenditures and increase revenues to the maximum extent feasible. The program must include demolition of structures that cannot be cost effectively rehabilitated, and that are identified in the GMPA for demolition. The Trust is also directed to evaluate for possible demolition and/or replacement those buildings identified as categories 2 through 5 in the Presidio of San Francisco Historic Landmark District Historic American Building Survey (HABS) Report, 1985.

POTENTIAL IMPACTS

IMPACTS ON INDIVIDUAL BUILDINGS AND/OR THE NATIONAL HISTORIC LANDMARK DISTRICT

No Action Alternative (GMPA 2000)

These specific evaluations of HABS rated buildings are not included in the plan alternatives or the EIS analysis.

Building Rehabilitation

Under the No Action Alternative (GMPA 2000), the overall effect on historic buildings would be beneficial. Rehabilitation of historic buildings would be conducted in accordance with the *Guidelines for Rehabilitating Buildings at the Presidio of San Francisco* (NPS 1995), and the *Secretary of the Interior Standards for the Rehabilitation of Historic Properties* (NPS 1992). The Secretary's Standards direct the manner in which historic buildings are altered, in order to ensure that historic integrity is retained and to ensure that

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the rehabilitation is below the threshold of an adverse effect. Rehabilitation would have a beneficial effect on buildings, because it would reverse and/or prevent deterioration. Building-specific assessments of existing conditions, their character-defining features, and physical history reports would aid in the successful rehabilitation process. Historic building rehabilitation would be reviewed consistent with the Programmatic Agreement that constitutes the Trust's compliance with Section 106.

Stabilization and Maintenance

Stabilization of buildings for which no use is immediately available would re-establish structural stability and weather-resistance as necessary, also resulting in a beneficial impact. Stabilization would reestablish structural stability and weather-resistance and the work would be done in a manner that complies with the Secretary of the Interior's Standards.

Building Demolition

Under the No Action Alternative (GMPA 2000), a maximum of up to 1.12 million square feet (sf) of buildings could be demolished. The majority of this demolition would be of non-contributing buildings in the Crissy Field, East Housing, and South Hills Planning Districts. Demolition of non-contributing buildings would not impair the integrity of the NHLD, and could improve the NHLD by removing elements that are not consistent with its period of significance.

Those contributing buildings designated for demolition in the GMPA would be the only historic buildings subject to demolition under the No Action Alternative (GMPA 2000). Demolition of these structures (Buildings 113, 118, 681, 683, 1221, 1221A, 1285, 1369, 1387, 1390 and 1779) was analyzed in the GMPA EIS, which concluded that "the removal of 48 historic buildings would have an adverse effect on the NHLD but would not affect the status of the landmark." The GMPA EIS further concluded that overall impacts on historic buildings would be beneficial, due to the amount of building rehabilitation proposed. Because only those buildings previously identified for demolition would be demolished in the No Action Alternative (GMPA 2000), there would be no new adverse effect from demolition of contributing structures under this alternative.

New Construction

Up to 170,000 sf of new construction could occur under the No Action Alternative (GMPA 2000), concentrated in the Main Post, PHSH, and Fort Scott Planning Districts. New construction would be compatible with the NHLD through elements of building design, density, massing, and character-defining features of the surrounding historic setting. New construction under the No Action Alternative (GMPA 2000) would be subject to several controls to ensure compatibility with surrounding buildings and the NHLD. Specifically, adopted GMPA EIS mitigation calls for preparation of guidelines for compatible new construction, and compliance with the *Secretary of Interiors Standards for the Rehabilitation of Historic Properties*, which would ensure that new construction is compatible with existing historic buildings and the NHLD. Under the No Action Alternative (GMPA 2000), new construction would also be subject to further review under Section 106 of the NHPA, as described in the Programmatic Agreement and would have to comply with Planning Principles and Planning District Guidelines contained in the Final Plan (See Appendix B of the Final EIS). The Planning Principles require that the mass, scale, style and color of new construction be compatible with the historic setting of the Presidio. The Planning District Guidelines identify character-defining features of each planning district that would need to be maintained or enhanced, and include maximum building height by district, for new construction.

District Descriptions

The following are general actions contemplated for each of the Planning Districts that could affect cultural resources:

Main Post

The removal of some historic structures (per the 1994 GMPA) to provide replacement parking for the parking lost when the parade ground is restored, would have an adverse effect on the NHLD but would not affect its status. In general, buildings would be rehabilitated and some limited new construction could occur if needed to meet essential program and management needs. New construction would be sited and designed to be compatible with the NHLD.

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Maximum demolition = 50,000 sf

Maximum new construction = 100,000 sf

Crissy Field (Area B)

The removal of non-historic buildings in the central area of Crissy Field would allow for natural resource restoration. Rehabilitation of the remaining historic buildings would be a beneficial effect.

Maximum demolition = 220,000 sf

Maximum new construction = 0

Letterman

The future LDAC will be the largest physical change to the Presidio's built environment. The remaining historic buildings would be rehabilitated, few other changes would occur in this district.

Maximum demolition = 0

Maximum new construction = 0

Fort Scott

No building demolition beyond what was proposed in the 1994 GMPA is proposed for this district. However, some new construction could occur to accommodate a relocated maintenance function of the Golden Gate Bridge District and a new assembly space to support Fort Scott's reuse. New construction would be sited and designed to be compatible with the setting.

Maximum demolition = 0

Maximum new construction = 50,000 sf

Public Health Service Hospital

The nonhistoric front addition to the former hospital (building 1801) would be demolished and the historic front façade rehabilitated and possibly restored. This would have a beneficial effect on the integrity of the original hospital building. If a suitable tenant could not be found, the hospital building might be demolished, subject to additional analysis. Other historic buildings in this district would be rehabilitated and reused.

Maximum demolition = 130,000 sf

Maximum new construction = 20,000 sf

East Housing

The removal of non-historic housing in this district would have a beneficial effect on the setting of the historic landscape and historic buildings.

Maximum demolition = 100,000 sf

Maximum new construction = 0

South Hills

The removal of the Wherry housing complex would allow for restoration of open space and native plant habitat.

Maximum demolition = 620,000 sf

Maximum new construction = 0 sf

Conclusion

In summary, the No Action Alternative (GMPA 2000) would have an overall beneficial effect on historic resources. Rehabilitation of historic buildings would comply with *Secretary of Interior Standard's for the Rehabilitation of Historic Properties*. The removal of identified historic buildings would be an adverse effect, but the analysis and consultation process for their removal was already completed as part of the 1994 GMPA FEIS. There would not be any

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new significant adverse impact on historic resources, because demolition of historic buildings would not differ from the GMPA, The relatively small amount of new construction would be designed to be compatible with the historic setting. Compatibility of new construction would be accomplished by conformance with the Secretary's Standards, the Final Plan Planning Principles and Planning District Guidelines, and by compliance with Section 106 of the NHPA, as described in the Programmatic Agreement with the NPS, State Historic Preservation Officer (SHPO), and the ACHP. A signed copy of the agreement is included in Appendix D.

Final Plan Alternative

In accordance with the Final Plan Planning Principles and District Guidelines, the Trust will protect the historic character and integrity of the NHLD while allowing changes that will maintain the site's vitality. Every reasonable effort to adapt historic properties to new uses will be made, and new construction and demolition of historic buildings will be minimized as needed to meet policy and plan objectives. The Trust will engage the public in dialogue before making any decision to proceed with a specific proposal that could potentially have a significant adverse effect on a historic resource. The Presidio Trust will utilize the process for consultation as stipulated in the signed Programmatic Agreement to minimize adverse effects on historic resources and ensure the preservation and protection of the NHLD.

Building Rehabilitation

Similar to the No Action Alternative (GMPA 2000), rehabilitation and reuse of historic structures would occur in accordance with the *Secretary of Interior's Standards for the Treatment of Historic Properties* (NPS 1992) and the *Guidelines for Rehabilitating Buildings at the Presidio of San Francisco* (NPS 1995). Every reasonable effort would be made to incorporate compatible adaptive uses that require minimal alteration of the character defining materials, features, spaces and spatial relationships of historic buildings and their settings, while meeting financial and other goals. In cases where adequate historical documentation exists, historic buildings may be partially restored to permit better understanding of their significance, which would have a beneficial effect on historic resources. This may involve the

removal of later additions to historic buildings and restoration of documented historic features.

With regard to housing, the Final Plan Alternative emphasizes the subdivision of non-historic residential buildings, and/or conversion of non-residential buildings to residential use, as a way to minimize the amount of needed new residential construction. Historic residential buildings could be subdivided in some cases, and historic non-residential or group housing (e.g., dormitories, barracks) buildings could be converted to use as dwelling units. While the precise buildings that would be subject to subdivision or conversion have not been determined, mitigation requiring conformance with the Secretary of the Interior's Standards would ensure no adverse effect on the buildings involved.

Stabilization and Maintenance

Tenants may not be found immediately for all of the buildings. The Presidio Trust is developing a cyclical maintenance program to prevent damage to historic fabric and ensure that buildings are well maintained, until such time as they are rehabilitated and occupied. This plan will include guidelines for actual "moth-balling," preserving and monitoring vacant buildings and will include directives for physical inspections and routine monitoring for deterioration. If deterioration is then identified, actions will be taken to arrest further impacts. The Trust currently implements routine maintenance activities including painting, roof and window repairs, and other actions which help to stabilize historic buildings. The Final Plan Alternative would also provide for the preservation and protection of the historic coastal defense batteries within Area B. The NPS Manual for the Preservation of Coast Batteries will be used as a guide for these efforts.

Demolition

Under the Final Plan Alternative, a maximum of up to 1.07 million sf of buildings could be demolished (approximately 50,000 sf less than under the No Action Alternative). The majority of this demolition would be non-contributing buildings in the South Hills, East Housing, and PHS Planning Districts. Demolition of non-contributing buildings would not impair the integrity of the NHLD, and could improve the NHLD by removing elements

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that are not consistent with its period of significance. Maximum levels of demolition are provided for each Planning District (see below).

Under the Final Plan Alternative, demolition of historic buildings would be minimized. However, historic structures that may not be cost-effectively rehabilitated or re-used and that are identified for demolition in the GMPA would be evaluated for possible demolition or replacement. Consistent with the Trust Act, other buildings would also be evaluated for possible demolition and replacement based on the cost effectiveness of their rehabilitation and reuse. Any loss of buildings that contribute to the significance of the NHLD would be an adverse effect, however, the Presidio Trust would ensure overall integrity of the NHLD would be preserved and protected, as committed to in the final Plan. The decision-making process for building demolition or replacement will be subject to public notice, outreach, environmental review, and consultation with historic preservation agencies (as stipulate in the signed Programmatic Agreement) to fulfill the Trust's obligations under Section 106 of the NHPA. Specific mitigation measures would be developed at that time in consultation with the State Historic Preservation Officer, the ACHP, and the NPS.

New Construction

A maximum of 710,000 sf of new (replacement) space could be constructed under the Final Plan Alternative (approximately 540,000 sf more than under the No Action Alternative). Under the Final Plan Alternative, every reasonable effort will be made to adapt historic properties to new uses and to minimize new construction. New construction would include building additions, an annex adjacent to an existing building, infill buildings set within an existing cluster or buildings, or as stand-alone structures in developed areas. New construction will primarily be undertaken as a means to encourage reuse of historic buildings – to enhance the function of an existing historic building or to make their rehabilitation and reuse economically viable. In other cases, new construction would be considered to achieve other plan objectives.

The exact location of new construction is not known at this time, however, new construction will only occur in existing areas of development, and only as necessary to replace building space that is removed. New buildings would be

sited to minimize impacts on adjacent resources and be designed to be compatible with the historic setting, New construction will be used to reinforce historic character-defining features of an area and its design will ensure that the association, feeling, and setting of the significant elements and the integrity of the NHLD are protected. Maximum levels of new construction are provided for each planning district (see below).

New construction could have an adverse affect on individual buildings. However, since new construction would be in conformance with the PTMP Planning Principles, the Planning District Guidelines, and other stipulations as outlined in the Programmatic Agreement, including subsequent analysis, review, and public input, these actions, neither individually nor collectively will impair the integrity of the NHLD. The Planning Principles require that the mass, scale, style and color of new construction be compatible with the historic setting of the Presidio. The Planning District Guidelines identify character-defining features of each district that will need to be maintained or enhanced, and include maximum building height by district, for new construction.

District Descriptions

The following are general actions contemplated for each of the Planning Districts that could affect cultural resources:

Main Post

Historic buildings would be rehabilitated and returned to active use. Some non-historic buildings may be demolished to restore historic settings and views. Additions to historic buildings may be necessary to make their reuse feasible. Stand-alone new construction may also be considered where appropriate – for example, to replace the YMCA if it is removed for restoration of Tennessee Hollow, or to re-establish historic spatial patterns, such as the historic edge of the Old Parade ground. New building construction would be subject to additional analysis, public input, and consultation under the Programmatic Agreement.

Maximum demolition =20,000 sf

Maximum new construction = 110,000 sf

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Crissy Field (Area B)

Some non-historic buildings in this district may be demolished to increase open space and to enhance the visual and historic setting. Limited new construction would be considered primarily to make reuse of historic structures possible. For example, a low-scale annex to Stilwell Hall could enable the building's reuse as lodging.

Maximum demolition = 40,000 sf

Maximum new construction = 70,000 sf

Letterman

The future Letterman Digital Arts Center will be the largest physical change to the Presidio's built environment. Other changes in the Letterman district may include demolishing non-historic buildings and replacing them with more compatible structures that would reinforce the historic setting of the old hospital buildings and former courtyard, and create a more pedestrian-scaled environment. Historic buildings would be rehabilitated.

Maximum demolition = 30,000 sf

Maximum new construction = 160,000 sf

Fort Scott

Demolition of minor outbuildings will be considered at Fort Scott, as will additions to historic buildings or building clusters to facilitate their reuse. For example, a meeting space may be required to support the educational programs envisioned for Fort Scott. Non-historic housing may be replaced with more compatible structures in the area behind the Pilots Row houses (North Fort Scott). The Golden Gate Bridge District may also relocate its maintenance functions from the bridge toll plaza to both existing and new buildings in this district, consistent with the No Action Alternative (GMPA 2000). Historic buildings would be rehabilitated for new uses, or stabilized (such as some of the coastal defense structures).

Maximum demolition = 70,000 sf

Maximum new construction = 170,000 sf

Public Health Service Hospital

Similar to the No Action Alternative (GMPA 2000), the non-historic wings of the historic hospital would be considered for removal to allow for restoration of the historic façade. If this occurs, the major shift in square footage that may occur in this district would be replacement of the non-historic wings' square footage with buildings elsewhere on the site. Other historic buildings within the complex would be rehabilitated for new uses. Similar to the No Action Alternative, if a suitable tenant could not be found for building 1801, its removal and replacement could be considered in the future, subject to further analysis.

Maximum demolition = 130,000 sf

Maximum new construction = 130,000 sf

East Housing

Similar to the No Action Alternative (GMPA 2000), there would be a decrease in building square footage by removing non-historic housing in this district to restore the Tennessee Hollow riparian corridor. This could allow for rehabilitation of the historic setting for historic residences. Some replacement housing could be constructed in remaining non-historic building clusters if required to meet plan objectives.

Maximum demolition = 100,000 sf

Maximum new construction = 70,000 sf

South Hills

The phased removal of the non-historic Wherry Housing complex (Baker Beach Apartments) and some of the East and West Washington Boulevard housing would allow for restoration of open space, native plant habitat, and wildlife corridors.

Maximum demolition = 680,000 sf

Maximum new construction = 0

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Conclusion

Under this Final Plan Alternative, a commitment to the preservation of the integrity of the NHLD is made, and processes are set in place for assessing and minimizing the effects of future actions that could have the potential to adversely effect the NHLD. The overall effect on historic resources would be beneficial. Rehabilitation of historic buildings, would comply with the Secretary of Interior's Standard for the Rehabilitation of Historic Properties. Under the Final Plan Alternative, there may be some adverse effects on individual historic resources, through the course of building demolition and/or new construction. These potential actions would be subject to further planning and consultation with historic preservation agencies and the public. The finalized PA outlines criteria and processes for the Trust to use in determining effects and pursuing consultation with the ACHP, SHPO, NPS and other parties, as necessary, for actions that could adversely effect historic resources. Through the application of the Planning Principles, the Planning District Guidelines, and Section 106 consultation as articulated in the Programmatic Agreement (including consultation regarding site-specific design guidelines and/or schematic designs for new construction) the Trust would ensure that new construction is compatible with the existing historic setting, and that the integrity of the NHLD is not impaired. A signed copy of the Programmatic Agreement is included in Appendix D.

Final Plan Variant

Building Rehabilitation

Similar to the Final Plan Alternative, historic building rehabilitation would comply with the *Secretary of Interior's Standards for the Rehabilitation of Historic Properties*, and thus would constitute a beneficial effect of the alternative.

With regard to housing, the Final Plan Variant emphasizes the subdivision of residential buildings, and/or conversion of non-residential buildings to residential use, as a way to avoid new residential construction. Historic residential buildings could be subdivided in some cases, and historic non-residential or group housing (e.g., dormitories, barracks) buildings could be converted to use as dwelling units. Mitigation requiring conformance with the

Secretary of the Interior's Standards would ensure no adverse effect on the buildings involved.

Stabilization and Maintenance

Similar to the Final Plan Alternative, cyclical maintenance will prevent damage to historic fabric.

Demolition

Under the Final Plan Variant, up to 1.25 million sf of buildings could be demolished to allow for expanded open space including wetlands expansion at Crissy Field and native plant habitat restoration in the southwest part of the Presidio (approximately 130,000 sf more than under the No Action Alternative). The majority of this demolition would be non-contributing buildings in the South Hills, East Housing, Crissy Field, and PSHH Planning Districts. Demolition of non-contributing buildings would not impair the integrity of the NHLD, and could improve the NHLD by removing elements that are not consistent with its period of significance. Maximum levels of demolition are provided for each Planning District (see below).

Demolition of some historic warehouses on Mason Street for the expansion of Crissy Field wetlands would be considered an adverse effect, but every effort would be made to otherwise protect and preserve the integrity of the NHLD. If the Trust proposes demolition of a historic building the proposal will be subject to public notice, outreach, environmental review, and consultation with historic preservation agencies (as stipulated in the signed Programmatic Agreement) to fulfill the Trust's obligations under Section 106 of the NHPA. Specific mitigation measures would be developed at that time in consultation with the State Historic Preservation Officer, the ACHP, and the NPS.

New Construction

There is no new construction proposed under the Final Plan Variant.

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District Descriptions

The following are general actions contemplated for each of the Planning Districts that could affect cultural resources:

Main Post

Historic buildings would be rehabilitated and returned to active use. Some non-historic buildings may be demolished to restore historic settings and views. No new additions to historic buildings or construction of new buildings would be allowed.

Maximum demolition = 20,000 sf

Maximum new construction = 0 sf

Crissy Field (Area B)

Some non-historic buildings in this district may be demolished to increase open space and to enhance the visual and historic setting. Four of the historic warehouses on Mason Street could also be removed for the expansion of the Crissy Marsh.

Maximum demolition = 270,000 sf

Maximum new construction = 0 sf

Letterman

The future Letterman Digital Arts Center will be the largest physical change to the Presidio's built environment. Other changes in the Letterman district may include demolishing non-historic buildings for the restoration of Tennessee Hollow.

Maximum demolition = 40,000 sf

Maximum new construction = 0 sf

Fort Scott

Demolition of minor outbuildings will be considered at Fort Scott similar to the demolition proposed in the Final Plan Alternative.

Maximum demolition = 10,000 sf

Maximum new construction = 0 sf

Public Health Service Hospital

Similar to the No Action Alternative, the non-historic wings of the historic hospital would be considered for removal to allow for restoration of the historic façade. This building would be converted to residential use. Other historic buildings within the complex would be rehabilitated for new uses.

Maximum demolition = 130,000 sf

Maximum new construction = 0 sf

East Housing

Similar to the No Action Alternative, there would be a decrease in building square footage by removing non-historic housing in this district to restore the Tennessee Hollow riparian corridor. This could allow for rehabilitation of the historic setting for historic residences.

Maximum demolition = 100,000 sf

Maximum new construction = 0 sf

South Hills

The phased removal of the non-historic Wherry Housing complex (Baker Beach Apartments) and some of the East and West Washington Boulevard housing would allow for restoration of open space, native plant habitat, and wildlife corridors.

Maximum demolition = 680,000 sf

Maximum new construction = 0

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Conclusion

In summary, the Final Plan Variant would have a beneficial effect on the NHLD through the course of building rehabilitation and preservation, although some of the Mason Street warehouses would be removed, in addition to the eleven buildings proposed in the No Action Alternative (GMPA 2000). The Trust would attempt to minimize effects on the NHLD status through conformance with the PTMP Planning Principles and the Planning District Guidelines. The effect on the integrity of the NHLD through any historic building demolitions would be determined during Section 106 compliance review and consultation. This would entail consultation with the ACHP, SHPO, NPS, and consulting parties according to the Programmatic Agreement included in Appendix D.

Resource Consolidation Alternative

Building Rehabilitation

Similar to the Final Plan Alternative, historic building rehabilitation would comply with the *Secretary of Interior's Standards for the Rehabilitation of Historic Properties*, and thus would constitute a beneficial effect of the alternative.

Stabilization and Maintenance

Similar to the Final Plan Alternative, cyclical maintenance will prevent damage to historic fabric.

Building Demolition

Under the Resource Consolidation Alternative, up to 1.91 million sf of existing building space could be demolished to allow for expanded open space including wetlands expansion at Crissy Field and native plant habitat restoration in the southwest part of the Presidio. This amount of demolition would be substantially more than under either the No Action (GMPA 2000) or Final Plan Alternatives, and would include most non-historic buildings and removal of the entire PSHH complex, including the former hospital and its associated seventeen historic outbuildings, to create open space. The majority

of buildings to be demolished would be in the south of the Presidio. An additional 640,000 (+/-) sf are anticipated to be in the Crissy Field, Main Post, Fort Scott, East Housing, and Letterman Planning Districts (see district descriptions below). Demolition in these areas could include and adversely affect contributing buildings.

Demolition of the PSHH complex, including removal of all the historic buildings and cultural landscapes, would be considered an adverse effect of this alternative. Cultural landscape features from the historic PSHH complex would be incorporated into the new landscaping, but would not fully offset the removal of this historic complex. Demolition of the PSHH complex and any other contributing buildings not called out for demolition in the GMPA would have an adverse affect on the NHLD, but every effort would be made to protect and preserve the integrity of the overall NHLD. If the Trust proposes demolition of a historic building or new construction, the proposal will be subject to public notice, outreach, environmental review, and consultation with historic preservation agencies (as stipulated in the signed Programmatic Agreement) to fulfill the Trust's obligations under Section 106 of the NHPA. Specific mitigation measures would be developed at that time in consultation with the State Historic Preservation Officer, the ACHP, and the NPS.

New Construction

A maximum of 1.25 million sf of new (replacement) space could be constructed under the Resource Consolidation Alternative, which is more than under either the No Action (GMPA 2000) or Final Plan Alternatives. New construction would primarily occur within the planning districts in the northern part of the park, and would be considered as replacement square footage for the large amount of built space removed in the South Hills areas. The exact location of new construction is not known at this time. Consequently, it is possible that new construction would occur in the vicinity of historic and contributing buildings. New construction that could have an adverse effect would be subject to further review under NEPA and Section 106 of the NHPA, as provided in the Programmatic Agreement and would have to comply with Planning Principles and Planning District Guidelines contained in the Final Plan. (See Final Plan Alternative discussion) New construction would be designed and sited to be compatible with the historic

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setting, and would be limited to the replacement of existing structures of similar size in existing areas of development as provided by the Trust Act and the Planning District Guidelines. Through the application of the Planning District Guidelines, and Section 106 consultation (including consultation regarding site-specific design guidelines and/or schematic designs for new construction) the Trust would ensure that new construction is compatible with the existing historic setting, and that the integrity of the NHLD is not substantially impaired. The Resource Consolidation Alternative's commitment to ensure the compatibility of new construction could ultimately preclude the introduction of the maximum levels of potential new construction identified for each planning district.

District Descriptions

The following are general actions contemplated for each of the Planning Districts, which could effect cultural resources:

Main Post

Under this alternative, the amount of new construction at the Main Post would be greater than any of the other alternatives. Non-historic buildings would be removed to restore historic view corridors and settings, and new construction would be sited and designed in keeping with the historic character of the district. New construction could allow for the restoration or re-establishment of historic patterns and spatial relationships between building clusters and formal landscape areas. The amount of total square footage for the main post would reinforce its function as the community and visitor center of the Presidio.

Maximum demolition = 100,000 sf

Maximum new construction = 330,000

Crissy Field (Area B)

Non-historic buildings would be removed at Crissy Field in order to expand the existing wetlands south of Mason Street and allow for an increase in open space. Some replacement construction would occur but would be sited away

from the expanded wetlands and in keeping with the historic building clusters at the east and west ends.

Maximum demolition = 220,000 sf

Maximum new construction = 150,000 sf

Letterman

The Letterman Complex district would have the largest amount of new construction, compared to the other districts under this alternative. The net increase of built space would be approximately 400,000 sf in this district. This new construction would occur outside of the 23-acre LDAC site and would primarily be in the western portion of the district. New construction would reinforce the historic patterns of the former hospital complex, and would primarily be for office uses.

Maximum demolition = 80,000

Maximum new construction = 470,000 sf

Fort Scott

The level of change within the Fort Scott district would be similar to the Final Plan Alternative, and the integrity of the historic setting would be respected.

Maximum demolition = 80,000 sf

Maximum new construction = 150,000 sf

Public Health Service Hospital

The entire building complex (both historic and non-historic structures) at the former hospital site would be removed and native habitats restored and open space with recreational opportunities created. These removals of contributing structures would constitute an adverse effect on the NHLD.

Maximum demolition = 400,000 sf

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Maximum new construction = 0

East Housing

The level of demolition within the East Housing District would be greater than the other alternatives, but would include a fair amount of replacement construction for non-historic housing which is removed. Demolition of non-historic housing would allow for the Tennessee Hollow stream corridor restoration. New residential construction would be sited and designed to be compatible with both the historic housing clusters as well as with the restored natural systems.

Maximum demolition = 160,000 sf

Maximum new construction = 150,000 sf

South Hills

Similar to the No Action (GMPA 2000) and the Final Plan Alternatives, all of the Wherry Housing complex would be removed as well as the non-historic East and West Washington housing clusters.

Maximum demolition = 870,000 sf

Maximum new construction = 0

Conclusion

In summary, the Resource Consolidation Alternative would have a beneficial effect on the NHLD through the course of building rehabilitation and preservation. However, there would also be an adverse effect on the NHLD due to the proposed demolition of the historic PSHH complex. The effects due to demolition would be more severe than under either the No Action (GMPA 2000) or Final Plan Alternatives, because more demolition would occur, and because the PSHH would be removed. However, through the course of building demolition and new construction, the Trust would attempt to minimize effects on the NHLD status through conformance with the PTMP Planning Principles and the Planning District Guidelines. The effect on the integrity of the NHLD through the PSHH building demolitions could not be

determined until the full Section 106 compliance review and consultation process was completed. This would entail consultation with the ACHP, SHPO, NPS, and consulting parties according to the Programmatic Agreement included in Appendix D. The current agreement would be expanded or a new agreement pursued to address the specific proposed demolition of the PSHH complex.

Sustainable Community Alternative

Building Rehabilitation

In accordance with Planning Principles, the Sustainable Community Alternative would preserve, rehabilitate and reuse historic structures to the maximum extent feasible. The effects of historic building rehabilitation would be similar as those under the Final Plan Alternative. Rehabilitation would occur in accordance with the *Secretary of Interior's Standards for the Treatment of Historic Properties* (NPS 1992) and the *Guidelines for Rehabilitating Buildings at the Presidio of San Francisco* (NPS 1995). Every reasonable effort would be made to incorporate compatible adaptive uses that require minimal alteration of the character defining materials, features, spaces and spatial relationships of historic buildings and their settings, while meeting financial and other goals.

Stabilization and Maintenance

Similar to Final Plan Alternative, cyclical maintenance will prevent damage to historic fabric.

Building Demolition

Under the Sustainable Community Alternative, up to 0.89 million sf of built space could be demolished, which is the least amount of demolition of any of the alternatives except for the Minimum Management Alternative. While most of the demolition would affect non-contributing buildings, such as Wherry housing, the approximately 110,000 sf of demolition that could occur in the Main Post and Crissy Field Planning Districts could include historic and/or contributing buildings. Although the total potential for demolition of historic buildings would be reduced under this alternative, the possibility that historic

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buildings would be removed would not be eliminated. Any loss of buildings that contribute to the significance of the NHLD would be an adverse effect, however, the Presidio Trust would ensure overall integrity of the NHLD would be preserved and protected, as committed to in the final Plan. If the Trust proposes demolition of a historic building or new construction, the proposal will be subject to public notice, outreach, environmental review, and consultation with historic preservation agencies (as stipulated in the signed Programmatic Agreement) to fulfill the Trust's obligations under Section 106 of the NHPA. Specific mitigation measures would be developed at that time in consultation with the State Historic Preservation Officer, the ACHP, and the NPS.

New Construction

Under this alternative, there could be approximately 620,000 sf of new (replacement) construction. The exact location of new construction is not known at this time, but it would occur in areas of existing development. Consequently, it is possible that new construction would occur in the vicinity of historic and contributing buildings. Similar to the Final Plan Alternative, new construction that could have an adverse effect would be subject to further review under NEPA and Section 106 of the NHPA, and would have to comply with Planning Principles and Planning District Guidelines contained in the Final Plan. New construction would be designed and sited to be compatible with the historic setting, and would be limited to the replacement of existing structures of similar size in existing areas of development as provided by the Trust Act and the Planning District Guidelines. Through the application of the Planning District Guidelines, and Section 106 consultation (including consultation regarding site-specific design guidelines and/or schematic designs for new construction) the Trust would ensure that new construction is compatible with the existing historic setting, and that the integrity of the NHLD is not impaired.

District Descriptions

The following are general actions contemplated for each of the Planning Districts, which could effect cultural resources:

Main Post

Under this alternative, there would be very little demolition but a significant level of new infill construction in addition to reuse of existing buildings. New construction would be sited and designed in keeping with the historic character of the district and would allow for the restoration or re-establishment of historic patterns and spatial relationships between building clusters and formal landscape areas. The amount of total square footage for the Main Post would reinforce its function as the community and visitor center of the Presidio.

Maximum demolition = 40,000 sf

Maximum new construction = 270,000

Crissy Field (Area B)

Some non-historic buildings would be removed at Crissy Field and some replacement construction would occur to support new uses and activities. New construction would be sited and designed to be in keeping with the historic building clusters at the east and west ends.

Maximum demolition = 70,000 sf

Maximum new construction = 140,000 sf

Letterman

The Letterman Complex district would have a minimal level of change from existing conditions. There would be some minor building demolition and no new construction. Opportunities to reinforce the historic courtyard space through new construction in West Letterman would not occur.

Maximum demolition = 20,000

Maximum new construction = 0

Fort Scott

There would be a minimal level of change within the Fort Scott district from existing conditions. Some minor building demolition would occur and no new

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construction would be allowed. The emphasis in this district would be on the rehabilitation and reuse of all buildings (historic and non-historic).

Maximum demolition = 30,000 sf

Maximum new construction = 0

Public Health Service Hospital

There would be very little change from existing conditions. The non-historic wings of the former hospital building would be retained and rehabilitated for reuse along with the former hospital and outbuildings. There would be some minor level of demolition and some new construction, to facilitate reuse of the existing buildings, would be allowed.

Maximum demolition = 10,000 sf

Maximum new construction = 20,000 sf

East Housing

There would be a significant level of demolition of non-historic housing within the East Housing District, and this would be counterbalanced by a significant level of new replacement construction for more compatible residential units than exists today. Demolition of non-historic housing would allow for the Tennessee Hollow stream corridor restoration. New residential construction would be sited and designed to be compatible with both the historic housing clusters as well as with the restored natural systems. The overall density of this district would be increased, and care would be taken to preserve the character and feel of the historic housing clusters and their streetscapes.

Maximum demolition = 100,000 sf

Maximum new construction = 190,000 sf

South Hills

Similar to the No Action Alternative (GMPA 2000), all of the non-historic Wherry Housing complex would be removed and no replacement construction would occur.

Maximum demolition = 620,000 sf

Maximum new construction = 0

Conclusion

Similar to the Final Plan Alternative, overall effects on historic resources would be beneficial as a result of rehabilitation of historic buildings, which would comply with *Secretary of Interior Standard's for the Rehabilitation of Historic Properties*. The integrity of the NHLD would be respected, and its status preserved. Under this alternative, there may be some adverse effects on individual historic resources through the course of building demolition and/or new construction. These potential actions would be subject to further planning and consultation with historic preservation agencies and the public. The finalized Programmatic Agreement outlines criteria and processes for the Trust to use in determining effects and pursuing consultation with the ACHP, SHPO, NPS and other parties, as necessary, for actions that could adversely effect historic resources. Through the application of the Planning Principles, the Planning District Guidelines, and Section 106 consultation pursuant to the Programmatic Agreement (including consultation regarding site-specific design guidelines and/or schematic designs for new construction) the Trust would ensure that new construction is compatible with the existing historic setting, and that the integrity of the NHLD is not impaired. A signed copy of the Programmatic Agreement is included in Appendix D.

Cultural Destination Alternative

Building Rehabilitation

This alternative would be similar to the Final Plan Alternative, except that it would increase the amount of demolition, and potential new (replacement) construction. As with the Final Plan Alternative, historic structures would be

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preserved, rehabilitated and reused to the maximum extent feasible. Rehabilitation would occur in accordance with the *Secretary of Interior's Standards for the Treatment of Historic Properties* (NPS 1992) and the *Guidelines for Rehabilitating Buildings at the Presidio of San Francisco* (NPS 1995). Every reasonable effort would be made to incorporate compatible adaptive uses that require minimal alteration of the character defining materials, features, spaces and spatial relationships of historic buildings and their settings, while meeting financial and other goals.

Stabilization and Maintenance

Similar to the Final Plan Alternative, cyclical maintenance would prevent damage to historic fabric.

Building Demolition

There would be a potential for demolition of up to 1.37 million sf in this alternative, which is more than under either the No Action (GMPA 2000) or Final Plan Alternatives. The majority of demolitions would affect non-contributing, non-historic structures, in the Fort Scott, East Housing and South Hills Planning Districts, including Wherry Housing and residential buildings along East and West Washington Blvd. Demolition of non-contributing buildings would not impair the integrity of the NHLHD, and could improve the NHLHD by removing elements that are not consistent with its period of significance.

Under the Cultural Destination Alternative, historic structures that may not be cost-effectively rehabilitated or re-used would also be evaluated for possible demolition or replacement. Any loss of buildings that are individually historically significant or that contribute to the significance of the NHLHD would be an adverse affect.

The extent to which demolitions would differ from those proposed in the GMPA, and the potential for impacts to the NHLHD, cannot be assessed until more specific information is developed. Any loss of buildings that contribute to the significance of the NHLHD would be an adverse effect, however, the Presidio Trust would ensure overall integrity of the NHLHD would be preserved and protected, as committed to in the final Plan. If the Trust

proposes demolition of a historic building or new construction, the proposal will be subject to public notice, outreach, environmental review, and consultation with historic preservation agencies (as stipulate in the signed Programmatic Agreement) to fulfill the Trust's obligations under Section 106 of the NHPA. Specific mitigation measures would be developed at that time in consultation with the State Historic Preservation Officer, the ACHP, and the NPS.

New Construction

A maximum of 1.37 million sf of new space could be constructed under the Cultural Destination Alternative. This alternative would have the greatest amount of new construction. The exact location of new construction is not known at this time, but would occur in areas of existing development. Consequently, it is possible that new construction would occur in the vicinity of historic and contributing buildings. New construction that could have an adverse effect would be subject to further review under NEPA and Section 106 of the NHPA, and would have to comply with Planning Principles and Planning District Guidelines contained in the Final Plan. New construction would be designed and sited to be compatible with the historic setting, and would be limited to the replacement of existing structures of similar size in existing areas of development as provided by the Trust Act and the Planning District Guidelines. Through the application of the Final Plan Planning District Guidelines, and Section 106 consultation pursuant to the Programmatic Agreement (including consultation regarding site-specific design guidelines and/or schematic designs for new construction) the Trust would ensure that new construction is compatible with the existing historic setting, and that the integrity of the NHLHD is not impaired. The Trust's commitment to ensure the compatibility of new construction could ultimately preclude the introduction of the maximum levels of potential new construction identified for each planning district.

District Descriptions

The following are general actions contemplated for each of the Planning Districts, which could effect cultural resources:

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Main Post

Under this alternative, there would be very little demolition but a greater level of new infill construction than the No Action (GMPA 2000) and Final Plan Alternatives. New construction would be sited and designed in keeping with the historic character of the district and would allow for the restoration or re-establishment of historic patterns and spatial relationships between building clusters and formal landscape areas. The amount of total square footage for the main post would reinforce its function as the community and visitor center of the Presidio.

Maximum demolition = 50,000 sf

Maximum new construction = 240,000

Crissy Field (Area B)

Some non-historic buildings would be removed at Crissy Field and some replacement construction would occur to support new uses and activities. A significant level of new construction would be allowed to support new uses and activities under this alternative. New construction would be sited and designed to be in keeping with the historic building clusters, and would complement remaining non-historic building clusters as well.

Maximum demolition = 50,000 sf

Maximum new construction = 290,000 sf

Letterman

The Letterman Complex district, similar to the Resource Consolidation Alternative, would have a significant amount of new construction, compared to the other districts under this alternative. Some demolition would occur and new construction would primarily be in the western portion of the district. New construction would reinforce the historic patterns of the former hospital complex, and would primarily be for office and residential uses.

Maximum demolition = 70,000

Maximum new construction = 410,000

Fort Scott

Similar to the Final Plan Alternative, there would be some building demolition and a significant amount of new construction at Fort Scott. New construction would support an increase in space for residential use as well as lodging and conference activities. For example, a meeting space may be required to support the educational programs envisioned for Fort Scott. Non-historic housing may be replaced with more compatible structures in the area behind the Pilots Row houses (North Fort Scott). The Golden Gate Bridge District may also relocate its maintenance functions from the bridge toll plaza to both existing and new buildings in this district, consistent with the No Action Alternative (GMPA 2000).

Maximum demolition = 80,000 sf

Maximum new construction = 200,000 sf

Public Health Service Hospital

Similar to the Final Plan Alternative, the non-historic hospital wings could be removed at that square footage replaced elsewhere within the district.

Maximum demolition = 130,000 sf

Maximum new construction = 130,000 sf

East Housing

Similar to the Final Plan Alternative, there would be a significant level of demolition of non-historic housing within the East Housing District, and a near equivalent amount of replacement construction for more compatible residential units. Demolition of non-historic housing would allow for the Tennessee Hollow stream corridor restoration. New residential construction would be sited and designed to be compatible with both the historic housing clusters as well as with the restored natural systems.

Maximum demolition = 130,000 sf

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Maximum new construction = 100,000 sf

South Hills

Similar to the Resource Consolidation Alternative, all of the non-historic Wherry Housing complex as well as the East and West Washington Blvd. housing clusters would be removed and no replacement construction would occur.

Maximum demolition = 860,000 sf

Maximum new construction = 0

Conclusion

Similar to the Final Plan Alternative, a commitment to the preservation of the integrity of the NHLD is made, and processes are set in place for assessing and minimizing the effects of future actions that could have the potential to adversely effect the NHLD. Rehabilitation of historic buildings, done in compliance with the *Secretary of Interior's Standard for the Rehabilitation of Historic Properties*, would have a beneficial effect on the NHLD. Under this alternative, there may be some adverse effects on individual historic resources, through the course of building demolition and/or new construction. These potential actions would be subject to further planning and consultation with historic preservation agencies and the public. The finalized PA outlines criteria and processes for the Trust to use in determining effects and pursuing consultation with the ACHP, SHPO, NPS and other parties, as necessary, for actions that could adversely effect historic resources. Through the application of the Planning Principles, the Planning District Guidelines, and Section 106 consultation (including consultation regarding site-specific design guidelines and/or schematic designs for new construction) the Trust would ensure that new construction is compatible with the existing historic setting, and that the integrity of the NHLD is not impaired.

Minimum Management Alternative

Building Rehabilitation

Under the Minimum Management Alternative, there would be no demolition or new construction. Existing buildings would be rehabilitated and leased for new uses garnering maximum possible financial return. Rehabilitation of buildings that contribute to the NHLD would conform to essential code requirements, the *Guidelines for Rehabilitating Buildings on the Presidio of San Francisco* (NPS 1995) and the *Secretary of the Interior's Standards for the Rehabilitation of Historic Properties* (NPS 1992). The Secretary's Standards direct the manner in which historic buildings are altered, in order to ensure that historic integrity is retained and to ensure that rehabilitation is below the threshold of an adverse effect. Rehabilitation projects would repair and restore elements of contributing buildings that could deteriorate if no maintenance or reuse of the resource were to occur.

Stabilization and Maintenance

Same as Final Plan Alternative.

Building Demolition

No demolition would occur under this alternative.

New Construction

No new construction would occur under this alternative.

Conclusion

Rehabilitation of historic buildings would comply with the Secretary's Standards and in general would have a beneficial effect on the NHLD. However, because there would be no building demolition of non-historic structures, the opportunity to restore and rehabilitate of historic settings would be missed. New construction would also not be available as a way to facilitate rehabilitation and reuse of historic buildings.

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IMPACTS ON THE PRESIDIO CULTURAL LANDSCAPE

No Action Alternative (GMPA 2000)

Under the No Action Alternative (GMPA 2000), there would be a substantial level of non-historic building demolition to expand open space, as well as a commitment to enhance natural areas, including areas in the South Hills, Tennessee Hollow, and an expanded Crissy Field marsh. Native plant communities and riparian corridors would be restored and the historic forest would be rehabilitated and preserved. Open space within Area B would increase from about 695 acres to about 794 acres, and native plant habitat would expand from 70 acres to about 210 acres. Habitat supporting rare or endangered species would be enhanced. Exotic plants would be removed. Wetland features would be protected, enhanced and restored where feasible. Historic linkages that were once physically or visually connected, such as the Main Post to Crissy Field connection, would be reestablished.

These and other changes to the cultural landscape would be generally beneficial. Features identified as significant (Land and Community Associates 1992) would generally be maintained or enhanced. The historic forest would be rehabilitated, and vegetation would be removed in other areas to restore historic vistas and views. Site improvements, such as removal of excess pavement, introduction of wayside exhibits, signs, site furniture, trails, paths, and lighting, would be compatibly designed to ensure no adverse effect on the NHLD.

The approximately 170,000 sf of new (replacement) construction that could occur under the No Action Alternative (GMPA 2000) would be subject to several controls to ensure compatibility with surrounding buildings and the NHLD. Specifically, the GMPA EIS mitigation calls for preparation of guidelines for compatible new construction, and compliance with the *Secretary of Interior's Standards for the Rehabilitation of Historic Properties*, which would ensure that new construction is compatible with existing historic buildings and the NHLD. Under this alternative, new construction would also be subject to further review under Section 106 of the NHPA, and would have to comply with Planning Principles and Planning District Guidelines contained in the Final Plan.

Final Plan Alternative

The Final Plan Alternative would involve less potential building demolition and more potential new construction than the No Action Alternative (GMPA 2000). In other ways, the Final Plan Alternative would be similar to the No Action Alternative (GMPA 2000) with regards to the Presidio cultural landscape. Features identified as significant (Land and Community Associates, 1992) would generally be maintained or enhanced. The historic forest would be rehabilitated, and vegetation would be removed in other areas to restore historic vistas and views. Site improvements, such as removal of excess pavement, introduction of wayside exhibits, signs, site furniture, trails, paths, and lighting, would be compatibly designed to ensure no adverse effect on the NHLD.

New (replacement) construction would be subject to several controls to ensure compatibility with surrounding buildings and the NHLD. Specifically, new construction would be subject to further review under Section 106 of the NHPA as outlined in the Programmatic Agreement, and would have to comply with Planning Principles and Planning District Guidelines contained in the Final Plan.

Final Plan Variant

Under the Final Plan Variant, there would be more building demolition than the No Action Alternative (GMPA 2000) and no new construction. As with the GMPA 2000 and Final Plan Alternatives, the non-historic Wherry housing would be removed, along with some non-historic housing in the Tennessee Hollow Planning District. These demolitions would allow for natural resource enhancements and habitat expansion. In addition, some historic and non-historic buildings would be removed to allow expansion of Crissy Field marsh to a 30-acre tidal wetland.

With the exception of the changes on Mason Street, the changes to the cultural landscape would be generally beneficial. Features identified as significant (Land and Community Associates, 1992) would generally be maintained or enhanced. The historic forest would be rehabilitated, and vegetation would be removed in other areas to restore historic vistas and views. Site improvements, such as removal of excess pavement, introduction of wayside

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exhibits, signs, site furniture, trails, paths, and lighting, would be compatibly designed to ensure no adverse effect on the NHLD.

Resource Consolidation Alternative

The Resource Consolidation Alternative would have the greatest amount of building demolition of any alternative, and would result in the most noticeable changes to the Presidio cultural landscape. As with the No Action (GMPA 2000) and Final Plan Alternatives, the non-historic Wherry housing would be removed, along with some non-historic housing in the Tennessee Hollow Planning District. These demolitions would allow for natural resource enhancements and habitat expansion. In addition, non-historic buildings would be removed to allow expansion of Crissy Field marsh, similar to the No Action Alternative (GMPA 2000), and historic and non-historic buildings and landscape features at the PSHS and along East and West Washington would be removed to allow for expanded natural areas in the southern portion of the park.

Native plant communities and riparian corridors would be restored and the historic forest would be rehabilitated and preserved. Open space within Area B would increase from about 695 acres to about 838 acres, more than in any other alternative. Native plant habitat would also be expanded, similar to the No Action (GMPA 2000) and the Final Plan Alternatives. Habitat supporting rare or endangered species would be enhanced. Exotic plants would be removed. Wetland features would be protected, enhanced and restored where feasible. Historic linkages that were once physically or visually connected, such as the Main Post to Crissy Field connection, would be reestablished.

With the exception of changes at the PSHS complex, the changes to the cultural landscape under this alternative would be generally beneficial. Features identified as significant by Land and Community Associates in 1992 would generally be maintained or enhanced. The historic forest would be rehabilitated, and vegetation would be removed in other areas to restore historic vistas and views. Site improvements, such as removal of excess pavement, introduction of wayside exhibits, signs, site furniture, trails, paths, and lighting, would be compatibly designed to ensure no adverse effect on the NHLD.

Substantial new construction would be subject to several controls to ensure compatibility with surrounding buildings and the NHLD. Specifically, new construction would be subject to further review under Section 106 of the NHPA as outlined in the Programmatic Agreement, and would have to comply with Planning Principles and Planning District Guidelines contained in the Final Plan.

Sustainable Community Alternative

The Sustainable Community Alternative would involve the least amount of demolition of any alternative, with the exception of the Minimum Management Alternative, and would result in mostly beneficial changes to the cultural landscape, similar to the No Action (GMPA 2000) and the Final Plan Alternatives. Features identified as significant by Land and Community Associates in 1992 would generally be maintained or enhanced. The historic forest would be rehabilitated, and vegetation would be removed in other areas to restore historic vistas and views. Site improvements, such as removal of excess pavement, introduction of wayside exhibits, signs, site furniture, trails, paths, and lighting, would be compatibly designed to ensure no adverse effect on the NHLD.

The Sustainable Community Alternative would involve somewhat more new construction than the No Action Alternative (GMPA 2000), and slightly less than the Final Plan Alternative. New construction would be subject to several controls to ensure compatibility with surrounding buildings and the NHLD. Specifically, new construction would be subject to further review under Section 106 of the NHPA as outlined in the Programmatic Agreement, and would have to comply with Planning Principles and Planning District Guidelines contained in the Final Plan.

Cultural Destination Alternative

The Cultural Destination Alternative would have effects on the Presidio cultural landscape similar to the Final Plan Alternative, except that more non-historic housing would be removed to expand open space areas in the south of the park, and more new construction would occur in the north. Features identified as significant by Land and Community Associates in 1992 would

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generally be maintained or enhanced. The historic forest would be rehabilitated, and vegetation would be removed in other areas to restore historic vistas and views. Site improvements, such as removal of excess pavement, introduction of wayside exhibits, signs, site furniture, trails, paths, and lighting, would be compatibly designed to ensure no adverse effect on the NHLD.

New construction would be subject to several controls to ensure compatibility with surrounding buildings and the NHLD. Specifically, new construction would be subject to further review under Section 106 of the NHPA as outlined in the Programmatic Agreement, and would have to comply with Planning Principles and Planning District Guidelines contained in the Final Plan.

Minimum Management Alternative

Under the Minimum Management Alternative there would be no demolition or new construction. The primary potential negative impact under this alternative would be neglect. Without appropriate attention to the rehabilitation and enhancement of contributing landscape features, portions of the cultural landscape could be neglected or removed.

MITIGATION MEASURES

The following mitigation measures apply to all alternatives unless otherwise noted.

Measures Adapted from the GMPA EIS

CR-1 *Documentation of Buildings to be Relocated or Removed.* Before historic buildings or additions to historic buildings are relocated or removed, appropriate mitigating measures would be determined in consultation with the California State Historic Preservation Officer, and the Advisory Council on Historic Preservation during the Section 106 consultation process. Measures would include recordation according to the Historic American Building Survey Standards. In addition, salvage, preservation, and curation of historic building fabric may be warranted in some situations.

CR-2 *Code Compliance.* As stipulated in the Presidio Trust Act, the Trust would upgrade buildings to meet life/safety standards and to comply with the Americans with Disabilities Act (ADA) as necessary. Rehabilitation of historic buildings would include modification to meet applicable building codes to the extent practicable.

CR-3 *Long-Term Maintenance & Preservation of Vacant Buildings.* Following rehabilitation of historic buildings, the Trust would ensure that tenants perform continued maintenance, thereby preventing damage to historic features and ensuring that buildings are adequately maintained. A preservation and maintenance program for unoccupied buildings would include: regular inspections, necessary stabilization work to ensure long-term preservation and safe conditions for park visitors; monitoring of the condition of vacant buildings; and prioritization of stabilization and rehabilitation needs to ensure the maximum feasible preservation and protection of park resources.

CR-4 *Future Planning to Guide Demolition and New Construction.* Before undertaking projects that involve historic building demolition, major new construction or significant changes to the Presidio's historic landscape, the Trust will solicit public input, conduct appropriate environmental analysis, and engage in a consultation process with historic preservation agencies as stipulated in the Programmatic Agreement (see Appendix D). Future projects would conform to the Final Plan Planning Principles, Planning District Guidelines, and the Secretary of the Interior's Standards, in a manner that assures the preservation of the NHLD.

CR-5 *Historic Forest Preservation and Rehabilitation.* The Trust would complete ongoing studies regarding the character of the Presidio's historic forest, and implementation strategies to guide future actions consistent with the objectives for the historic forest zone within the Presidio Vegetation Management Plan. Strategies would identify appropriate replacement species, tree stand management options, and exact areas for tree removal.

CR-6 *Monitor Visitor Impacts on Sensitive Resources.* The Trust would monitor sensitive cultural resources, such as historic landscape features and vacant structures, and prioritize actions to reduce any adverse impacts on these resources caused by park visitors and new uses. Potential remedies may

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include temporary closure of areas, protective barriers, and informational signs.

New Mitigation

CR-7 *Compliance with Standards for Building and Cultural Landscape Rehabilitation.* The Trust would ensure that building rehabilitation projects conform with the *Guidelines for Rehabilitating Buildings at the Presidio of San Francisco* (NPS 1995). If new uses are proposed for historic buildings, or if residential buildings are proposed for subdivision, the Trust would ensure that required building modifications conform with the *Secretary of the Interior Standards for the Rehabilitation of Historic Properties* (NPS 1992). For historic landscape rehabilitation, projects would conform with the *Secretary of the Interior's Guidelines for the Treatment of Cultural Landscapes*.

CR-8 *Ongoing identification of Historic Properties.* Consistent with requirements under Section 110 of the NHPA and the signed PA, the Presidio Trust will continue to evaluate for possible inclusion in the list of contributing resources, those buildings or structures which may become 50 years old or may have achieved exceptional significance since the 1993 NHL Update form was completed. These evaluations would also encompass archeological discoveries.

4.2.2 ARCHAEOLOGY

METHODOLOGY

Section 110 of the NHPA of 1966, as amended, specifies that archaeological resources must be taken into consideration before implementing any federal action. The Archaeological Resources Protection Act (ARPA) of 1979, as amended, defines archaeological resources; requires federal permits for excavation; provides for curation of materials, records, and other data; provides for confidentiality of archaeological site locations; and, in the 1988 amendment, requires the inventorying of public lands for archaeological resources. The Native American Graves Protection and Repatriation Act (NAGPRA) of 1990, as amended, outlines the federal government's responsibility for the treatment and ultimate disposition of human burials and grave-related materials. These laws, along with their implementing

regulations and policies have been followed in analyzing potential impacts on archaeological resources.

POTENTIAL IMPACTS

DESTRUCTION OF, OR DAMAGE TO, ARCHAEOLOGICAL RESOURCES

No Action Alternative (GMPA 2000)

Based on prior archaeological discoveries at the Presidio and within the city and county of San Francisco, it is likely that additional significant subsurface prehistoric archaeological sites are present within the Presidio. The 218 years of military occupation has also resulted in the deposition of significant known historic archaeological resources as well as making the potential for additional site discoveries high.

There are three recorded prehistoric archaeological sites in the Presidio. There are numerous historic archaeological features, two of which -- *El Presidio de San Francisco* and the Crissy Field Quartermaster dump -- are undergoing extensive research and analysis by the Trust and NPS.

New construction on any part of the Presidio could adversely affect prehistoric and historic archaeological resources. The removal of structures, pavement, or vegetation on any part of the post would also have the potential to disturb archaeological resources. The restoration of riparian corridors, drainages, wetlands, and other water features, including El Polin Spring and Tennessee Hollow, could have a significant impact on archaeological resources, both prehistoric and historic. Most prehistoric sites in the San Francisco area have been discovered where aquatic-based foods were available and near freshwater streams or springs. In addition, ongoing repair and maintenance of buildings, structures, roads, and utilities near known archaeological sites or in archaeologically sensitive areas would increase the likelihood of resource disturbance.

Until preliminary designs are available for specific projects or planning districts, it would not be possible to accurately inventory and determine the effects of particular actions or groups of actions on archaeological resources.

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Direct effects would vary and be closely related to the nature and extent of specific ground disturbing actions. Direct effects on archaeological resources would be avoided to the extent possible through consultation between the project managers and the Trust's archaeological staff. If significant archaeological sites could not be avoided, a decision would be made to: abandon or redesign the proposed project to protect the archaeological site, proceed with the project under the terms of Stipulation XI Archaeology of the Programmatic Agreement (see Appendix D), or to consult with the State Historic Preservation Officer to develop mitigating measures, such as data recovery through archaeological excavation and recordation of sites. If previously unknown resources were discovered during construction subsequent to inventory efforts using best available technology, the Trust would comply with Programmatic Agreement Stipulation XII Discoveries.

The Main Post Planning District contains the site of *El Presidio de San Francisco*, the single most important archaeological site in the park. Restoration of the parade ground would be constructed in such a manner as to avoid impacts to the *El Presidio* site, and would conform to the recommendations adopted from the Archaeological Management Plan for this site. All other activities in proximity to the El Presidio quadrangle would be designed to minimize or avoid impacts to the site. The Tennessee Hollow riparian stream corridor restoration also has the potential for significant impacts to buried archaeological resources. The stream corridor has been characterized as archaeologically sensitive for sites of prehistoric occupation and U.S. Army eras (1861-1865, 1866-1890). No inventory has been conducted for the stream corridor restoration.

Building removal and site improvements to expand Crissy Marsh have high potential to impact significant prehistoric and historic archaeological sites. The remains of a single human of Native American ancestry were discovered near the Commissary in 1972. Discovery of a prehistoric site during the construction of the current Crissy Marsh required project redesign and a significant extensive historic site was also discovered and scientifically excavated to allow for the wetlands development.

The west area of the Letterman Planning District is an area of archaeological sensitivity for prehistoric archaeological sites and historic archaeological evidence of U.S. Army occupations from 1865-1890.

Any new construction at the Fort Scott Planning District might adversely affect historic archaeological sites or buried architectural features associated with historic coastal defense batteries dating to 1891-1914. This area is not considered very likely to contain evidence of prehistoric occupation.

The PHS Planning District is archaeologically sensitive for the discovery of historic sites dating to 1866-1890, which covers the activities of the earliest Marine Hospital Merchant Marine Cemetery. Building demolition, new construction, infrastructure upgrades, vegetation management, and native plant restoration all have the potential to impact archaeological sites.

The East Housing Planning District is archaeologically sensitive for both prehistoric and historic archaeological sites. Evidence of Native American and Spanish presence has been archaeologically documented in the vicinity of El Polin Spring. The Tennessee Hollow riparian stream corridor restoration also has the potential for significant impacts to buried archaeological resources. The stream corridor has been characterized as archaeologically sensitive for sites of prehistoric occupation and U.S. Army eras (1861-1865, 1866-1890). No inventory has been conducted for the stream corridor restoration.

Impacts on archaeological resources from the Wherry housing removal are considered unlikely assuming that the demolition activities take place within the footprint of the original construction. Archaeological sites can be buried by shifting dunes and other natural processes but potential impacts may be avoided through construction constraints. Several areas identified for vegetation management or enhancement have the potential to impact archaeological resources. An archaeological survey and subsurface testing, if necessary, would be completed prior to initiation of individual vegetation projects. Expansion of native plant habitat has a potential to impact prehistoric and historic archaeological sites. Vegetation projects would be redesigned in order to avoid impacts to significant archaeological resources.

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In conclusion, direct impacts on all archaeological sites cannot be analyzed at the present time because all sites have not been identified. Many of the actions required to make utilities and other infrastructure safe and/or in compliance with current standards, as well as emergency repairs, might affect unknown or known archaeological resources. New construction as well as repair and maintenance of existing buildings, roads, and other features would increase the likelihood of damage to sites. Measures contained in the Programmatic Agreement would help avoid or mitigate some of these adverse impacts on sites. In addition, this alternative includes measures to protect archaeological resources, including systematic inventories of Area B, subsurface investigations, permits requiring archaeological review prior to ground disturbance, and evaluation, recordation, cataloging, storage, and/or display of resources, as appropriate.

Final Plan Alternative

This alternative would have impacts similar to the No Action Alternative (GMPA 2000) in all planning districts except for East Housing. Within this planning district, replacement housing within the Tennessee Hollow riparian corridor would have the potential to impact a significant archaeological area. Mitigation measures would avoid or mitigate these potentially adverse impacts on sites.

Final Plan Variant

The Final Plan Variant would have impacts similar to the No Action Alternative (GMPA 2000) in all planning districts except for Crissy Field (Area B). Under the Final Plan Variant, removal of additional buildings (warehouses along Mason Street) would have the potential to impact a significant archaeological area. Mitigation measures would avoid or mitigate these potentially adverse impacts on sites.

Resource Consolidation Alternative

Removal of housing and landscaping in the South Hills Planning District as proposed under this alternative including Wherry Housing and East and West Washington housing areas has the potential to impact archaeological resources. Building demolition and landscape vegetation activities at the

PHSH could also impact archaeologically sensitive areas. In addition, when compared to the No Action Alternative (GMPA 2000), this alternative has a higher potential to impact known and unknown archaeological sites in the north due to the greater amount of demolition and infill construction in as yet unspecified locations. The extent of this cannot be assessed without more specific information to be provided during subsequent planning and environmental review. The impacts could range from minimal to significant for both prehistoric and historic sites. Mitigation measures identified in the Programmatic Agreement would avoid or mitigate these adverse impacts on sites.

Sustainable Community Alternative

This alternative, when compared to the No Action Alternative (GMPA 2000), has a higher potential to impact known and unknown archaeological sites due to the greater amount of new construction in as yet unspecified locations. The extent of this effect cannot be assessed without more specific information to be provided during subsequent planning and environmental review. The impacts could range from minimal to significant for both prehistoric and historic sites. Mitigation measures would avoid or mitigate these adverse impacts on sites.

Cultural Destination Alternative

Removal of housing and landscaping in the South Hills Planning District including Wherry Housing and the East and West Washington housing areas has the potential to affect archaeological resources. In addition, when compared to the No Action Alternative (GMPA 2000), this alternative has a higher potential to affect known and unknown archaeological sites in other planning districts due to the greater amount of new construction and demolition in as yet unspecified locations. The extent of this cannot be assessed without more specific information to be provided during subsequent planning and environmental review. The impacts could range from minimal to significant for both prehistoric and historic sites. Mitigation measures identified in the Programmatic Agreement would avoid or mitigate some of these adverse impacts on sites.

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Minimum Management Alternative

This alternative would have minimal impacts on known or unknown sites since there would be no major demolition or new construction. As there would be no restoration of the Main Post parade ground or the riparian corridor in Tennessee Hollow, potential impacts to archaeologically sensitive areas in the El Presidio quadrangle and Tennessee Hollow corridor, would be avoided. Crissy Marsh would not be expanded and therefore impacts to archaeologically sensitive areas would not also occur. There would be no unanticipated archaeological discoveries at the PSHH because no construction or demolition is proposed. Since demolition of Wherry housing or revegetation in undisturbed areas would not occur, potential impacts from unanticipated archaeological discoveries would not occur.

MITIGATION MEASURES

Measures Adapted from the GMPA EIS

Applicable measures from the GMPA EIS have been incorporated into the Programmatic Agreement and apply to all alternatives.

New Mitigation Measures

The following measures are found in the Programmatic Agreement and apply to all alternatives.

CR-8 *Archaeological Management Assessment and Monitoring Program.* The treatment of archaeological properties would be handled in accordance with the terms of an Archaeological Management Assessment and Monitoring Program (AMA/MP) that is prepared for individual undertakings or groups of related undertakings. This program would ensure that all planned undertakings be reviewed by a qualified archaeologist prior to final design and/or approval. In addition to the AMA/MP, an archaeological research design would be prepared for any archaeological investigations that include testing for NR-eligibility, and test excavations or data recovery from prehistoric or historic sites that are known to be NR-eligible or are listed as contributors to the NHL. The Trust's management of archaeological

properties would be reviewed annually in accordance with Stipulation XXI of the PA.

CR-9 *Ground Disturbing Activities.* Ground disturbing maintenance activities and construction projects would be closely observed in the vicinity of sensitive archaeological areas to discover, document, protect, and manage the archaeological record of the Presidio. During the planning process for such projects, an AMA/MP would be prepared to determine whether archival research, subsurface coring or trenching, and/or test excavations are required prior to ground disturbance. Archaeological monitoring is appropriate in areas of predicted archaeological sensitivity or for sampling purposes in areas that are not considered sensitive when the natural ground surface is obscured by paving or fill, or in other instances where a pedestrian survey or archaeological testing cannot reasonably be accomplished. Any required archaeological monitoring would be implemented in accordance with an AMA/MP, prepared by qualified personnel. If historic properties are discovered during implementation of an undertaking, a detailed report would be prepared. Large-scale ground disturbing activities would be monitored in accordance with an AMA/MP. Should circumstances arise where the Trust cannot address archaeological concerns in a manner consistent with the AMA/MP, the Trust would notify the SHPO.

CR-10 *Archaeological Grid and Database.* The Trust anticipates that previously unidentified subsurface historic properties could be encountered within the NHL boundary due to the placement of fill over some of the historic marsh areas, historic landfill depositions, and other modifications to the land over 218 years of military occupation. The Trust would maintain an archaeological grid map and database of archaeological information for the Presidio, in cooperation with NPS. The map would also identify those areas where additional research and inventory are required during future project planning phases.

CR-11 *Excavation Permits.* The Trust would continue its policy of requiring all excavation permits to undergo archaeological review by qualified personnel, as defined in Stipulation III of the PA, prior to initiation of the requested activity. The excavation clearance process is included as Appendix B to the PA.

CR-12 *Archaeological Management Plan for El Presidio.* The Trust would prepare an Archaeological Management Plan (AMP) for the Spanish Colonial

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site known as “El Presidio de San Francisco.” The AMP would contain an inventory and evaluation of archival, architectural and archaeological features associated with this site; identify the likely presence of other significant features in the area; describe strategies for maintaining the site; contain standard operating procedures; establish programs to increase public awareness of this archaeological resource; recover data of archaeological significance; and provide for curation of archaeological collections and associated records. The AMP would be subject to peer review by NPS, SHPO, and if deemed necessary by the Trust, other qualified personnel.

CR-13 *Curation of Archaeological Collections.* All records associated with excavations and excavated materials not subject to NAGPRA that are deemed important for preservation would be accessioned, catalogued, and managed in accordance with 36 CFR Part 79, “Curation of Federally-Owned and Administered Collections.”

CR-14 *Discoveries.* If it appears that an undertaking would affect a previously unidentified property that could be eligible for inclusion in the

National Register, or could contribute to the NHL, or affect a known historic property in an unanticipated manner, the Trust would stop any potentially harmful activities in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the property until it concludes consultation with the SHPO.

CR-15 *Treatment of Discoveries.* If the newly discovered property has not previously been included in or determined eligible for the NR and provisions for its treatment are not contained in an approved research design or AMA/MP, the Trust may assume that the property is eligible for purposes of the PA. The Trust would notify NPS and SHPO at the earliest possible time and consult to develop actions that shall take the effects of the undertaking into account. The Trust would notify the SHPO of any time constraints, and the Trust and the SHPO would mutually agree upon timeframes for this consultation but not to exceed 30 days. If treatment of the discovery is not included in an approved research design or AMA/MP, the Trust would develop written recommendations reflecting its consultation with NPS and SHPO and as necessary, would present a plan and schedule to implement these recommendations.