

### 4.10 ARCHEOLOGICAL RESOURCES (AR)

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#### AR-1. *Underground Parking*

The NPS requests that the EIS should address the archaeological impacts of subsurface parking facilities.

**Response AR-1** – The Final Plan and EIS have been modified in response to this comment. Underground parking is not currently being proposed as part of this planning effort, but may be considered at a later date subject to separate environmental and public review. Underground parking would most likely destroy any archaeological deposits within its footprint. The areal extent of site destruction would be commensurate with the size of the parking facility and its coincidence, if any, with archaeological deposits. The significance of the archaeological impacts would be directly related to the significance of the resource being affected, which is unknown at this time but would be examined during future studies. The construction of underground parking within the quadrangle of the archaeological site of El Presidio de San Francisco and its exterior catchment areas would not be considered during any future planning efforts, as the Trust is committed to preserving this significant archaeological resource. Some archaeological resources could be covered to a sufficient depth by historic and modern fill deposits to avoid impacts from underground parking, but at this time data are insufficient to make this determination.

#### AR-2. *Impacts of Dune Mobility*

The USFWS requests an explanation as to how adverse impacts to archaeological sites would result from shifting dunes.

**Response AR-2** – New impacts to archaeological sites from shifting dunes would not occur because no shifting dunes are proposed. For existing dune formations, in addition to site exposure by dune transgression and preservation by dune burial, archaeological sites lose stratigraphic context and may become deflated when materials are moved. Temporarily exposed artifacts may be subject to illegal collection by the public. According to Leo Barker, GGNRA Archaeologist, impacts to archaeological sites, including the exposure of human burials, is a significant ongoing management concern of the NPS at Point Reyes, the Marin Headlands, Fort Mason, as well as at the Presidio.

#### AR-3. *Building Demolition*

The USFWS seeks an explanation as to why demolition of buildings within original footprints would be less of an impact to archaeological resources than stump removal and surface soil scraping.

**Response AR-3** – The analysis of impacts to archaeological resources is conducted on a case-by-case basis. In many cases, a careful review of as-built drawings, photographs and other construction documents demonstrate significant levels of heavy equipment grading, paving or other alteration to the historical landscape which would preclude the survival of archaeological deposits at or near the ground surface. Those archaeological resources below the impact zone from the building's original construction are often likely to not be affected by its deconstruction unless over-excavation is required for some reason such as environmental remediation. Many of the buildings at the Presidio are "temporary" structures erected in World War I or II and rest on concrete piers. Demolition of these, like their construction, may have minimal or no impact on archaeological resources. Impacts to archaeological resources from stump removal and soil scraping are more likely to occur in some areas for the reasons listed below. Areas of open space and vegetation in many instances are removed from the intense construction and operations activities found in the more developed portions of the Presidio where most of the building construction occurred. Trees planted by the Army as seedlings made minor intrusions into archaeological deposits at the time of planting, but have expanded in breadth and depth during their period of growth. Stump removal by grinding causes minimal to no impact to archaeological resources while stump removal by excavation can cause impacts by both over-excavation, which is required to remove the stump, and movement of equipment, if not

# RESPONSE TO COMMENTS

## 4. Responses to Comments

restricted to existing roadways. Surface soil scraping destroys any archaeological deposits or artifacts on the surface of the ground.

Archaeological resources known as “sheet scatters” are dispersed surface remains of short-term and single use during both prehistoric and historic times. Intact sheet scatters of historic materials may occur around the areas used historically by the Army or by earlier native populations. These are less likely to exist in the developed areas of the Presidio and more likely to be intact in the areas of open space and forestation.

### **AR-4. Tennessee Hollow Restoration**

The Urban Watershed Project asks the Trust to commit to archaeological and cultural resource investigations in advance of restoration work for Tennessee Hollow.

**Response AR-4** – The Trust will comply with the NEPA and the NHPA, as well as the planning guidelines, as it prepares a restoration plan for Tennessee Hollow and will include public involvement during the various phases of planning and technical studies. The Tennessee Hollow restoration planning effort will analyze impacts on cultural and archeological resources and on the National Historic Landmark District and seek to avoid or mitigate such impacts. It will conduct appropriate archaeological and cultural resources investigations and monitoring in advance of and during the implementation of the Tennessee Hollow project. See Response PG-31.

### **AR-5. NPS Specific Comment**

The NPS notes that the EIS states that impacts could range from minimal to significant for archaeological sites and requests that the Draft Plan be developed to the point where effects can be meaningfully evaluated.

**Response AR-5** – As noted in the EIS, based on prior archaeological discoveries at the Presidio, it is likely that additional significant subsurface prehistoric archaeological sites are present within the Presidio. Sensitivities are then noted within each planning district; however, it is concluded that direct impacts on all archaeological sites cannot be analyzed at the present time because all sites for new construction and associated actions have not been identified. The Programmatic Agreement includes mitigation that would avoid or mitigate any potential adverse effect and would apply to all alternatives. While the EIS does not indicate which specific archaeological resources would be affected by any alternative, it provides a meaningful evaluation of how disturbance to resources could occur and how the Programmatic Agreement would provide a means for protecting such resources, if encountered.