

### 4.21 VISITOR EXPERIENCE AND RECREATION (VE)

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#### VISITOR EXPERIENCE

##### VE-1. *Visitation Numbers and Methodology*

Various commentors express concern related to the number of visitors projected to visit the Presidio under the various alternatives. Comparisons to the projected 2010 visitation under the 1994 GMPA and other destinations are made. Several commentors, including the Fort Point Historical Society and California Heritage Council, address the methodology used in projecting visitors, including recommended changes, and request that additional explanation of the methodology be provided in the Final EIS. The NRDC requests clarification on the apparent discrepancy between a June 2000 issue of the Presidio Post newsletter which stated that annual visitation at the park is approximately 4 million, and the Draft EIS which indicates that currently visitation is 4.8 million.

**Response VE-1** – In response to comments, additional discussion of the methodology used in projecting future park visitors was incorporated into Section 4.4.4 of the Final EIS. The methodology itself was also modified in response to comments, as summarized below. Please note that additional comments regarding the analysis of visitor experience and cumulative effects

were also raised, and are addressed below and in the responses to Cumulative Impacts comments.

In determining the methodology to be used in the Draft EIS to project visitors, the Trust first examined the GMPA EIS. As is commonly practiced for other NEPA analyses, the GMPA relied on its traffic model as the basis for projecting visitors. The GMPA analysis used a factor to extrapolate projected visitors from total projected trips to the park. The Presidio Transportation Planning and Analysis Technical Report, the background report for the GMPA traffic analysis, presents these factors for each of the GMPA alternatives. Each GMPA alternative was assigned a unique, gross percentage factor that was applied to weekend and weekday trips to determine projected park visitors. For example, under Alternative A (the preferred GMPA alternative), it was assumed that in 2010, 52 percent of all weekday trips and 66 percent of weekend trips to the park would be made by visitors. By applying these factors to total trips, the GMPA Final EIS predicted that 2010 annual visitation at the Presidio would be 8.4 million (GMPA EIS, page 156).

It is the Trust's understanding that these percentages/factors were generated for each of the alternatives as output of the GMPA traffic model. Because these factors are unique to each GMPA alternative and the corresponding transportation report did not provide background information on how these percentages were derived, it was impossible for the Trust to replicate the visitation methodology using the same basis of percentages/factors. The Trust did, however, use a similar methodology using a percentage of trips generated by a particular land use that are assumed to be made by visitors. By using a unique percentage for each land use, the different mixes of land uses of each alternative yielded a distinct estimate of visitation.

In developing this methodology for the Draft EIS, the Trust paid attention to the CCSF Planning Department's Transportation Impact Analysis Guidelines, Interim Edition (January 2000) as the guidance document. These guidelines provide visitor generation percentages for a variety of land uses, which were then applied to projected trips (similar to the GMPA analysis) to predict future visitation. Overall, the percentages provided in the City's guidelines are notably higher than the gross percentage used in the GMPA analysis. For example, the City's guidelines suggest a visitor ratio of 82 percent for

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recreational land uses, 90 percent for lodging and 92 percent for retail. Based on these numbers, the Draft EIS assumed the average visitor ratio for all Presidio land uses would be 67 percent for the No-Action Alternative (GMPA 2000) versus the GMPA (Alternative A) assumption of 52 percent for weekday trips. In fact, none of the GMPA alternatives used a weekday factor above 52 percent. Therefore, the Draft EIS projections provided a higher level of visitation than was assumed in the GMPA EIS.

In response to comments, two primary changes to the methodology used to predict total park visitors were also made. First, cultural and educational uses were separated as educational uses (i.e., schools) would not generate visitors that are typically considered "recreational visitors." (The traffic and related analyses (i.e., air quality, noise, etc.) nonetheless continue to capture these trips for the purposes of adequately assessing the environmental effects of this use.) Second, the Draft EIS included projections for two different types of visitors: recreational and non-recreational. Non-recreational visitors include people coming to the park for non-recreational purposes such as business meetings, deliveries and services. This approach generated confusion for some reviewers, and the NPS requested additional explanation of these numbers in one of their comments. In response to comments, the Final EIS has been revised to provide an estimate of recreational visitors only. Refer to Table 1 and Section 4.4.4 of the Final EIS for additional information.

With regard to the NRDC's question related to existing visitation and the apparent discrepancy between the Draft EIS and the Presidio Post (June 2000 edition), the estimated 4.8 million visitors (for Area A and B combined) presented in the Draft EIS are based on the methodology explained above. Additional clarification and adjustments to the methodology have been incorporated into the Final EIS. It is assumed that the source for the Presidio Post statement from the Trust Executive Director indicating that "about four million people" visit the Presidio each year was a rounded number based on information found in the GMPA EIS which indicated that existing visitation was approximately 3.7 million (GMPA EIS, page 156).

### **VE-2. General Comments on Visitor Experience Analysis**

The NPS provides general comments and recommendations on how the EIS analysis of visitor experience should be expanded, as well as several text

changes. A discussion of these comments and the Trust's response is provided below. Detailed comments on specific aspects of the analysis raised by the NPS as well as other commentors, are addressed separately under Responses VE-3 and VE-4.

- The NPS requests that additional information on the current range of visitor experiences and assessment of changes that would be anticipated under the various alternatives be incorporated into the EIS.

**Response VE-2** – Both the Affected Environment and Environmental Consequences sections of the Draft EIS were carefully reviewed. In response to the NPS's request, Section 4.4.4 of the Final EIS has been somewhat revised. Section 3.4.4 (Affected Environment), however, continues to provide a comprehensive description of existing interpretation/visitor information facilities; interpretive programs; visitor facilities; park-based programs; and visitor services. The Trust believes supplemental discussion in this section is not warranted.

In revising Section 4.4.4, the GMPA EIS and the Crissy Field Plan EA were consulted as examples of how such changes could be made. The Final GMPA EIS identifies "visitor experience" in the Affected Environment section. However, it does not include this topic in the Environmental Consequences section. Rather, the Final GMPA EIS impact analysis focuses on three underlying topics: interpretation and education, recreation, and scenic viewing. The analysis describes changes in these three topic areas that will occur under each alternative, but no analysis of projected visitation and its impact on visitor experience is provided. Similarly, the Crissy Field Plan EA bases its analysis on current recreational opportunities and the impact of the plan and alternatives on these opportunities without information on projected numbers of visitors or the impact these visitors will have on the overall "visitor experience."

Section 4.4.4 of the Final EIS was revised to clarify the changes in visitor facilities and programs under each alternative, and the role of mitigation measures that will be implemented by the Trust to ensure that future visitation does not jeopardize park resources.

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- The NPS also recommends that a carrying capacity analysis which conforms to NPS Management Policy 8.2.1 be undertaken.

**Response** – Mitigation Measure CO-8 in both the Draft and Final EIS indicate that a carrying capacity analysis will be implemented, as needed based on monitoring of park visitorship. This is consistent with NPS Management Policy 8.2.1 and the approach used for preparation of the Final GMPA and EIS. In fact, Section 8.2 of the NPS Management Policies was the basis for the development of all of the mitigation measures presented in Section 4.4.4 of the Draft and Final EIS.

- The NPS references the range of visitors presented in the summary table of the Draft EIS and states that the visitation levels presented in the Draft EIS could have a noticeable effect on resources and visitor experience.

**Response** – As described in Response VE-1, several changes to the methodology used to project visitors were made in response to public comments and the Final EIS was updated to reflect these changes. None of the visitorship projections exceed those provided in the Final GMPA EIS for 2010, which did not identify impacts on park resources or the visitor experience. As noted in revisions to Final EIS Section 4.4.4, park visitorship would be disbursed throughout the park, and mitigation measures would ensure that unacceptable impacts would not occur.

- The NPS requests that all references to the possible relocation of the NPS visitor center at the Main Post be removed from the EIS, and that several other edits to the description of the No-Action Alternative (GMPA 2000) be made.

**Response** – The Final EIS has been revised in response to these requests.

- The NPS questions why the Resource Consolidation and Minimum Management Alternatives would "provide less variety of visitor facilities" than the No-Action Alternative (GMPA 2000), and as such why the Minimum Management Alternative would have greater projected visitation than the GMPA 2000.

Visitor facilities under the Resource Consolidation Alternative would focus on natural resource stewardship and related issues, and thus would have a lesser variety of programs and facilities than other alternatives. The Minimum Management Alternative would devote fewer resources (financial and building space) to programs and facilities. Refer to Response VE-1 for an explanation of how projected visitation was estimated.

### VE-3. *Feelings of Overcrowding*

A number of commentors negatively react to the Trust's admonition in the EIS that peak use could result in feelings of overcrowding among visitors in the Main Post and Crissy Field Planning Districts and note that such feelings should not be elicited in a national park.

**Response VE-3** – As indicated in Response VE-1, the methodology for calculating visitors was adjusted in response to comments. Additionally, the text referring to "overcrowding" has been omitted in recognition of the diversity of visitor attractions across the more than 1,400 acres of the Presidio and the likelihood that visitors will be disbursed across that area (i.e., to the golf course, the beaches, the visitor center, and other widely separated attractions).

Nonetheless, the Trust acknowledges that as more people visit the Presidio, both the resources of the park and the quality of the visitor experience can be affected. The principal difficulty lies in determining how much resource or user impact is too much. Given the substantial demand for public use of the park (e.g., witness Crissy Field on a summer weekend), some decline or change in the quality of visitor experience is inevitable in high traffic areas at peak times. However, mitigations in the Draft and Final EIS, including developing and implementing specific, measurable visitor management objectives (see Mitigation Measure CO-9), imposing management controls to ensure that park resources are protected (Mitigation Measure CO-6) and monitoring to determine if and when actions would be needed to keep recreation use at acceptable and sustainable levels (Mitigation Measure CO-8), will ensure that, while conditions for the visitor may diminish in high use areas on occasion (peak use days), the overall quality of the visitor experience and environmental resources will not be affected.

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### VE-4. Area A Effects

The BCDC requests clarification as to what visitor monitoring would consist of and what would be the result of monitoring if it was determined that Area B uses were negatively impacting Area A. The NPS expresses concern related to lack of specificity regarding development adjacent to Crissy Field (Area A), possible direct and indirect impacts in Area A, and encourages the Trust to conduct a public planning process for Crissy Field (Area B) before long-term leases are executed.

**Response VE-4** – The Trust will rely on professional judgment, law and policy, the best available scientific study or research, appropriate environmental review, and other available data in planning for and selecting Area B uses adjacent to Area A. The Trust will seek to attract only those uses appropriate to the purpose for which the park was established. The Trust will not allow uses that would impair park resources or values or would unreasonably interfere with NPS interpretive activities or other existing, appropriate park uses. As future plans are developed for Crissy Field (Area B), the Trust will cooperate with the NPS to the extent practicable to seek consistency with that agency’s visitor management policies and procedures and improvements made to Area A. The Trust will also consider the use and enjoyment of Crissy Field (Area A) when determining the appropriateness of future uses. Future environmental review and public comment will play a role in this consideration, although leasing of existing buildings for uses identified as “preferred” in the Final Plan and analyzed in this EIS may not require additional analysis. See Chapter Four of the Final Plan.

The Trust currently imposes management controls within property leases (such as parking restrictions, TDM, compliance with sustainability programs and conservation practices, visitor education, and public access and interpretation requirements) to ensure that the Presidio’s resources are protected. As noted by the BCDC in Mitigation Measure CO-8, Monitoring of Visitor Levels, the Trust will monitor visitation levels to ensure that park uses are not cumulatively resulting in unacceptable impacts on Presidio resources, including visitor experience. Monitoring will be conducted by using a number of methods, including visitor and vehicle counts, resource surveys, site inspections, and visual observations. If, as a result of monitoring, it is

determined that an ongoing or proposed use would cause unacceptable impacts to park resources, adjustments will be made to the way the use is conducted, including placing limitations on the use, so as to mitigate the unacceptable impacts. This will be committed to and enforced by the Trust as part of its mitigation program and NEPA administrative record.

In response to comments concerning development at Crissy Field, the Final Plan was revised to provide for a decrease in the maximum amount of new construction that will be permitted at Crissy Field (30,000 square feet greater than what currently exists). In addition, the Final Plan also provides more specificity regarding land uses at Crissy Field by stating “preferences” for museum use at the Commissary and Building 640, and for rehabilitation of Stilwell Hall for small-scale lodging. Future planning for Crissy Field (Area B) will involve the public and will also ensure that any enhancements made in Area B will not adversely affect the experience for visitors to Crissy Field (Area A).

## RECREATION

### VE-5. General Recommendations Related to Recreational Uses

Numerous individuals and groups express opinions regarding existing and planned future recreational facilities and uses within the Presidio. The focus of these comments are on specific recommendations which range from the treatment of play fields (ballfields, soccer, playgrounds, etc.), to dog walking, trails, swimming pools, volleyball courts, use by recreational vehicles (RVs), camping and low cost overnight accommodations within the park. Commentors generally support the PTMP concept for maintaining as much open space as possible for recreational uses and that recreational uses in natural areas should be kept to passive activities such as walking, bird watching, habitat restoration, etc.

**Response VE-5** – The Final Plan makes a commitment that the Trust will increase open space to enhance the park’s natural, scenic, and recreational qualities; provide for safe and enjoyable recreational use of the Presidio; improve larger open spaces for outdoor activities and play; and provide diverse opportunities for both passive and active recreation. Open spaces will

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be restored and expanded for increased visitor use and enjoyment, in balance with resource protection goals.

- *Active Sports Facilities and New Recreational Uses* – Several recommendations are made about the Presidio’s ballfields and tennis courts, that in general support maintaining existing fields, increasing the number of fields, and/or concentrating fields in the northern half of the park and removing active sports fields that are in native habitat zones. One commentor recommends the addition of frisbee golf and sand volleyball courts. Other commentors make specific recommendations for recreational uses and activities to be hosted at the Presidio.

**Response** – The Final Plan makes a commitment to increase and diversify recreational opportunities, from quiet contemplative walks to challenging active sports. See Chapter One, Scenic and Recreational Resources of the PTMP. The Trust is committed to retaining facilities for active recreational uses and will consider additional built facilities, indoors and outdoors, in the future; some existing facilities may be relocated or removed in conjunction with other planning projects. Future planning will further define compatible recreational activities and locations, and will address the potential relocation of existing facilities or construction of new ones, including ballfields.

In the future, the Trust will monitor changing patterns of use and trends in recreational activities and consider what activities are best suited to the Presidio in balance with resource protection goals. Building uses, such as tenants who offer yoga classes and alternative healing techniques, could be considered through leasing opportunities. As an example, the YMCA, which currently manages the Presidio’s main post gym and Letterman swimming pool and gym, offers some of these services as part of their overall program.

- *Dogs* – Several commentors raise concerns about current dogs on leash regulations in effect within the Presidio, as part of the GGNRA. Comments request further recognition in the Final Plan that the Presidio functions much like a city park for diverse uses that should be expanded to include off-leash walking, especially at Crissy Field; others requested that the Trust have a strict policy and enforcement program for dogs on leash.

**Response** – The Trust requirements on dogs in the park mirrors the NPS regulations, which the Trust adopted in 1998. Those regulations require that dogs be on a leash in all national parks where dogs are permitted. Dogs therefore are required to be on leash within Area B. With regard to Area A, which includes Crissy Field north of Mason Street, the GGNRA is currently engaged in a process that could ultimately lead to a rulemaking procedure to develop new pet management regulations for the GGNRA. The Trust is monitoring closely this rulemaking process and will give future consideration to its regulation regarding dogs once the GGNRA rulemaking process is concluded.

- *Trails & Bikeways* – A number of commentors express support for an increase in the number of trails, encouraging people to walk or ride bikes within the Presidio, and one commentor suggests that mountain bikes should be allowed to share off road multi-use paths with pedestrians.

**Response** – These recommendations are being considered and evaluated in the Trails and Bikeways Master Plan and EA, a separate public planning and environmental review process focused on park-wide pedestrian and multi-use trails and bikeways. The trails planning effort is being led jointly by the NPS and the Trust to ensure that a comprehensive approach to trail and bikeway management is provided for the Presidio. Visitor surveys and public scoping efforts conducted for the trails and bikeways planning effort yielded similar comments, and public involvement will continue to play an important role in the shaping and refinement of the various alternatives. The Trails and Bikeways Master Plan and EA will be released for public review and comment later this year.

- *Camping/RVs* – Some commentors recommend that the Trust provide a full range of overnight accommodations for visitors, including low-cost facilities such as tent camping and a park for RVs. Another commentor opposes the idea of an RV park at Crissy Field.

**Response** – The Final Plan provides for a limited amount of overnight accommodations, or lodging, to be primarily located within historic buildings. Dorm-style accommodations could provide affordable options, such as youth and elder hostels. Small inns and bed and breakfast accommodations would also be a suitable use of some of the Presidio’s historic buildings. The Final

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Plan also calls for the retention and enhancement of Rob Hill campground, a group camping facility, in the South Hills district. This campground will continue to be a group campground facility. Additional campgrounds could be considered in the future, possibly including a limited number of spaces for use of smaller recreational vehicles. No “RV park” or large area set aside for use by recreational vehicles has been identified in the Plan due to land use constraints and concerns about potential inconsistencies with the NHLD, other park resources and possible effects on the visitor experience.

*Windsurfing Access* – One commentor asks what can be done to maintain access for windsurfing.

**Response** – This access is provided through Area A of the Presidio (i.e., the coastal areas) which is and will continue to be managed by the NPS and is outside the Trust’s jurisdiction.