

4.31 CUMULATIVE IMPACTS (CI)

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CI-1. *General Comments on Cumulative Analysis*

Several commentors provide general comments on cumulative impacts in the Draft EIS. The comments range from general questions about the analysis to criticisms of the basis and methodology used to predict cumulative effects.

Response CI-1 – In response to the comments raised, the Trust performed a thorough review of Section 4.8 (Cumulative Impacts) of the Draft EIS, and revised several sub-sections on cumulative impacts. As a background, the discussion of cumulative impacts is organized by environmental resource topic. Table 62, which provides the context for the discussion, enumerates past, present and reasonably foreseeable actions, including projects by other agencies (NPS, USFWS, and the CCSF Planning Department), that were specifically considered in the analysis (in addition to background growth). The identified actions were chosen based on their proximity to the Presidio, their potential influence on the same resources that could be affected by implementation of the PTMP (i.e., whether the effects of these actions would be similar to those of the project), and the likelihood of their occurrence. The actions were identified by consulting with various agencies within a project impact zone (which varies for each resource) and investigating their actions in the planning, budgeting, or execution phase. The level of analysis and scope of cumulative impact assessment within each of the resource areas in the Final EIS is commensurate with the potential impacts, i.e., a greater degree of detail is provided for more potentially serious impacts. In some cases, cumulative effects were also compared to appropriate national, state, regional, or community goals to determine whether the total effect would be significant. In all but one resource area, the analysis in the Final EIS determined that cumulative impacts would not be significant and that the resources of concern would not be degraded to unacceptable levels. Cumulative air quality issues

were found to be potentially significant because of contributions to regional growth (i.e., not because of localized air quality impacts).

General issues raised by commentors, and responses are provided below.

- *Golden Gate Bridge Seismic Retrofit Project:* The GGBHTD states that the Golden Gate Bridge Seismic Retrofit Project will be ongoing and that this project should be recognized in the EIS.

Response – In response to this comment, the project was incorporated into Table 62 (cumulative context) of the EIS and considered in the assessment of cumulative traffic.

- *Biological and Water Resources:* The NRDC indicates that a number of the analyses appeared “excessively conclusory” and in particular referenced the discussion of biological and water resources.

Response – This section was refined in response to this comment, and additional clarity regarding cumulative impact conclusion statements provided. In particular, the NRDC stated that the Draft EIS concludes “... ‘programs and projects could contribute cumulatively to biological impacts at the Presidio,’” whereas it states that impacts to water resources “are not expected to be adverse” because “the Trust would strive to maintain ‘no loss’ of wetland features and adopt and enforce strict regulatory mechanisms...” Each of these specific comments is addressed below.

The reference to “programs and projects” contributing cumulatively to biological resource impacts at the Presidio is just one sentence in the analysis. The Trust concurs that, if read alone, this statement would appear to be “conclusory.” However, that sentence is directly supported with specific information on each of the programs and projects referenced, including current status, agency responsible for implementation, and a characterization of their relative effects on biological resources. Specifically, the analysis calls out whether the impact of each program and project would be beneficial or adverse (or potentially both), identifies the resources affected (i.e., dune habitat, San Francisco lessingia, etc.), and characterizes, based on the best available information, the magnitude and intensity of such effects. This

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information is used to provide the basis for the conclusion of potential cumulative effects. Identified effects would be mitigated by implementation of measures identified in the Natural Resources section of the EIS.

With regard to the specific statements taken from the water resources section, these were the first two sentences of the analysis and were intended to serve as an introduction. The Trust concurs again that, if read alone, these statements appear to have been made without supporting evidence. In response to this comment, these conclusion statements were moved from the introductory paragraph, and were refined and placed more appropriately after the supporting analyses upon which they are based.

- *Historic Resources:* The NRDC and one individual specifically comment on the historic analysis, stating that the lack of plan specificity has precluded a thorough analysis of cumulative impacts on the NHLD.

Response – The Final Plan and EIS have been modified in response to this comment. Chapter One of the Plan now contains a firm commitment to protecting and preserving the overall integrity and status of the NHLD, one of the principal issues with regard to potential cumulative effects. Chapter Three of the Final Plan now includes, for each planning district, additional information including the existing total building area, maximum permitted building area, maximum demolition, and maximum new construction in addition to land use preferences. Chapter Three also includes a set of planning guidelines for each district that would form the basis for future implementation activities. The assessment of cultural resources impacts in the Final EIS has been expanded to include a summary of related actions in each planning district for each alternative and to clarify which alternatives would affect the integrity of the NHLD, and which would not. Because specifics about building demolition and new construction beyond what is presented in the Final Plan are not known, the Plan commits to quantitative and qualitative standards and a process for public involvement as well as for historic compliance consultation to minimize potential effects. Also see Responses HR-1 and HR-22. This approach does not preclude the analysis and conclusions now presented with regard to cumulative effects in Section 4.8.1.

- *Foreseeable Actions:* The CCSF Planning Department states that while preparation of a programmatic environmental document is appropriate, the cumulative analysis is incomplete and should acknowledge buildout of Area A, the Letterman Complex, and all other subareas within the Presidio.

Response – The EIS analysis does, in fact, consider the referenced projects/actions. For example, the traffic analysis, and air quality and noise analyses, include consideration of Area A land uses and assumptions related to the Doyle Drive project, the Letterman Complex (including the LDAC project), and buildout of all of the planning districts at the park. The analysis also incorporates information provided by the San Francisco County Transportation Authority on regional travel demand. For additional discussion of the assumptions used in developing the transportation methodology, please refer to the responses to Transportation and Circulation comments.

- *Cumulative Impacts on Adjacent Neighborhoods:* Several commentors echo similar comments, with a focus on adjacent neighborhoods and the city as a whole.

Response – As described in Chapter 4 (both project-specific and cumulative analyses) of the Final EIS, consideration of impacts on adjacent neighborhoods and the city are discussed. Examples of analyses that address effects on adjacent neighborhoods and/or the City include the Noise, Water Supply, Wastewater Treatment and Disposal, and Transportation sections.

- *Cumulative Air Quality and Noise Impacts:* The Cow Hollow Neighbors in Action (CHNA) asks specific questions related to air quality and noise effects and the assumptions used in preparing the cumulative impact methodology.

Response – These issues are addressed in the responses to air quality and noise comments, as well as in Section 4.8 of the EIS. Because noise and air quality are largely traffic-generated the analysis of these issues was based on future travel forecasts that combined traffic associated with the project with existing traffic and projected increases in traffic due to other sources.

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- *Mitigation of Cumulative Effects:* The CHNA also asks how cumulative effects would be mitigated.

Response – Mitigation measures presented in Chapter 4 of the EIS would address the contribution of the EIS alternatives to the potential cumulative impacts identified. The mitigation presented in the EIS includes relevant measures taken from the GMPA, as well as new measures developed and refined in response to public comments to avoid or minimize to the greatest extent practicable the impacts associated with reuse of the Presidio as a national park. Other programs and projects identified in Table 62 may likewise include mitigation to address their contribution to potential cumulative effects. These are beyond the scope of the current analysis.

- *Special Events:* The CHNA questions the validity and accuracy of a “reply” made by the Trust to “coordinate events.”

Response – The apparent context of this comment relates to special events, and the CHNA states that the Presidio Trust has “made this promise since 1994 but has not kept (this) promise.” The Presidio Trust was established by the U.S. Congress in 1996, and did not assume administrative jurisdiction over Area B of the Presidio until 1998. Therefore the Trust can only respond to activities occurring within this timeframe. After assuming responsibility for Area B, the Trust established a Special Events department to review and permit special event activities to ensure that park resources are protected and events are adequately coordinated. Weekly coordination meetings with the NPS, Trust, U.S. Park Police, and Presidio Fire Department are held to track and discuss upcoming events. Events are reviewed, and are subject to environmental review as needed, on a case-by-case basis. Communication with additional agencies and groups, including the San Francisco Department of Parking and Traffic, is also completed, as needed, to ensure that adequate coordination is provided. Several mitigation measures presented in the EIS reiterate this process, and establish new requirements including a measure that specifically relates to special event parking management. Refer to Mitigation Measure TR-24 in the Final EIS.

CI-2. Cumulative Effects of Increased Visitation

The NRDC expresses concern related to increased visitation and states that the cumulative impact of this increase on the park’s resources has been ignored in the EIS. They ask that the EIS address the impact of more than doubling the “GMPA level” of visitors. The NRDC also makes comparisons with other parks and states that the Draft Plan “...would make Area B one of the top attractions....among all national state parks and amusement/theme parks in the State.”

Response CI-2 – Section 4.8 (Cumulative Effects) has been reviewed and refined in response to this and other comments related to the cumulative analyses. As a point of clarification, the GMPA Final EIS projected a 2010 annual visitation level of 8.4 million visitors (pages 18 and 162). This level of visitation is substantially higher than projected for the No Action Alternative (GMPA 2000) evaluated in the PTIP Draft EIS, which used a revised methodology to project 3.7 million visitors for Area B. An explanation of the methodology used to predict future visitation and adjustments made in response to public comments has been incorporated into the Final EIS. For additional information, including an overview of the differences in methodology used in the GMPA Final EIS and this document, refer to the Response VE-1.

The Trust strongly disagrees with the NRDC’s assertion that the cumulative impacts of increased visitation on park resources have been ignored in the EIS. The commentor is referred to, for example, Sections 4.5 (Transportation and Circulation), 4.3.4 (Air Quality), and 4.3.5 (Noise), which evaluate the effects of full reuse of the Presidio as a national park, including trips and visitation associated with Area A. Similarly, Section 4.3.1 (Biological Resources) evaluates and incorporates consideration of the relative visitor “use levels” for each of the alternatives on biological resources and identifies mitigation measures to preserve and protect park resources. For each of these resource topics, activities within Area A are also factored into the project-specific analyses, as appropriate, to ensure that a comprehensive assessment of the environmental consequences is provided. Implementation of suggested mitigation measures would limit visitor opportunities to those that are suited and appropriate to the park, and would prohibit visitor uses that would degrade the park’s resources or values. Management controls on visitor uses would be imposed to ensure that the Presidio’s resources are protected.

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Restrictions would be based on professional judgment, law and policy, the best available scientific study or research, appropriate environmental review, and other available data. As visitor use changes over time, the Trust would decide if additional management actions are needed to keep use at acceptable and sustainable levels. Visitor carrying capacities for managing visitor use would be identified if necessary.

Regarding comparisons with other parks, the Trust reviewed California state park data referenced by the NRDC. According to the information provided, existing Presidio visitation would also place the park among the top attractions in the state. The comparison with other state attractions appears to be made to reinforce the NRDC's statement regarding the need to evaluate the impact of increased visitation. As discussed above, the impacts of this increase in visitation are described in the Transportation and Circulation, Air Quality, Noise, and Biological Resources sections of the EIS. With regard to comparison with current visitation, the Draft (and Final) EIS provide information obtained from the NPS visitor database. As discussed in Section 3.4.4 of the EIS, NPS data indicate that visitation within the GGNRA (including Muir Woods National Monument, Fort Point, and the San Francisco Maritime Museum) was approximately 20.5 million in 2000 (NPS Visitation Database, www.nps.gov.)

Based on the analysis provided in the EIS, expanded facilities and programming under the PTMP would complement the visitor experience offered by the NPS's Presidio operations, the rest of the GGNRA, and other regional visitor resources. Cumulative regional development by NPS at the

Presidio, the rest of the GGNRA, and other regional visitor resources would contribute to regional and national efforts to expand interpretive and educational opportunities for the public. Additional educational resources would be available to Bay Area residents and visitors. The analysis concludes that no adverse cumulative impacts on visitor facilities are anticipated for any of the alternatives. As discussed in Section 4.4.4, the Trust would implement project-specific mitigation measures to ensure that future visitation does not adversely affect the Presidio's resources or the public's enjoyment of the park.

CI-3. Cumulative Analysis of Wastewater Effects

The NRDC criticizes the approach used in both the project-specific and cumulative analysis of wastewater treatment and disposal impacts. In particular, the NRDC references the lack of quantification and discussion of the CCSF's combined sewer overflows and corresponding contribution by the Presidio to such events.

Response CI-3 – In response to this comment, Sections 4.6.2 and 4.8.5 (project-specific and cumulative impacts) of the EIS were revised to specifically quantify the projected impact of the various alternatives on the CCSF's combined sewer system which would be de minimus. Additional discussion of combined sewer overflows was also incorporated into the EIS. Please refer to the responses to utilities (UT) comments for more information on these issues.