

**Coordinating the National Environmental Policy Act
with the National Historic Preservation Act for the Main Post Update**

The table below aligns the environmental and historic preservation process that the Presidio Trust is undertaking for the Main Post Update, shown in the third column, with the review process under the National Environmental Policy Act (NEPA), in the first column, and the National Historic Preservation Act (NHPA), in the second.

	NEPA	NHPA/Section 106	Presidio Trust
TO DATE			
1	Identify project objectives and scope	Establish "undertaking" <ul style="list-style-type: none"> • Notify appropriate SHPO • Plan to involve the public • Identify other consulting parties 	Notice of Intent sent to consulting parties: ACHP, SHPO, NPS, NTHP, PHA October 23, 2007 NEPA Scoping initiated with Notice of Intent October 29, 2007
2		<u>Finding</u> <ul style="list-style-type: none"> • No undertaking/no potential to cause effects, • Undertaking is type that might affect historic properties, or • Project is covered by an existing Programmatic Agreement (PA) 	Sec 106 consultation package sent to consulting parties: ACHP, SHPO, NPS, NTHP, PHA November 11, 2007

3	Identify social, economic, and environmental constraints	<p>Through consultation</p> <ul style="list-style-type: none"> • Determine scope of identification efforts • Identify historic properties • Evaluate historic significance • Resolve eligibility disputes 	<p>NEPA Scoping continues; public meeting November 28, 2007</p> <p>First Sec 106 consultation meeting December 11, 2007</p> <p>Scoping ends December 15, 2007</p>
4		<p><u>Finding</u></p> <ul style="list-style-type: none"> • No historic properties affected or • Historic properties affected <p>Time to resolve disputes/objections</p>	<p>2nd consultation package sent to consulting parties January 28, 2008</p> <p>2nd consultation meeting February 26, 2008</p>
5	Develop preliminary alternatives	Early in the process, in consultation with SHPO and other consulting parties	Alternatives, including publicly-suggested Alternative 2A, developed
6	Analyze the impacts of the alternatives	Through consultation, assess adverse effects by applying Criteria of Adverse Effect	Prepare draft SEIS Prepare draft FOE
7		<p><u>Finding</u></p> <ul style="list-style-type: none"> • No adverse effects; or • Adverse effects <p>Time to resolve disputes/objections</p>	<p>3rd consultation package mailed to consulting parties March 18, 2008</p> <p>Draft FOE May 27, 2008</p>

8	Incorporate alternatives analysis in the NEPA document, and circulate document for comment	Through consultation, consider comments and negotiate mitigation measures	<p>Draft SEIS available for comment June 2008</p> <p>Public tours June, July, August 2008</p> <p>1st Public Board meeting July 14, 2008</p> <p>Public Transportation Workshop July 28, 2008</p> <p>Draft FOE available for comment August 8, 2008</p> <p>3rd Consultation meeting September 16, 2008</p> <p>Alternatives Workshops September 25 and 28; October 2, 2008</p> <p>Public meeting on Conforming New Construction November 19, 2008</p> <p>Identification of Preferred Alternative December 5, 2008</p> <p>2nd Public Board meeting December 9, 2008</p>
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9	Incorporate comments into the identification of a preferred alternative	<p>“Avoid, minimize, mitigate” adverse effects through additional consultation and pursue:</p> <ul style="list-style-type: none"> • MOA • PA • Other program alternative <p>Time to resolve disputes/objections</p>	<p>Supplemental draft SEIS and revised draft FOE available for comment February 2009</p> <p>Public comment on all draft documents extended until 45 days after release of supplemental draft SEIS/revised draft FOE April 27, 2009</p>
NEXT STEPS			
			<p>Release agency final FOE TBD</p> <p>Release final SEIS TBD</p> <p>Release draft MOA/PA TBD</p>
10	Issue FONSI/ROD and continue with development	File MOA, PA, or final decision with SHPO, ACHP, and consulting parties; include copy in FONSI/ROD	Trust adopts a Record of Decision (ROD)

Source: Draft CEQ Handbook on Coordinating the National Environmental Policy Act with Other Federal Environmental Laws

GLOSSARY

ACHP	Advisory Council on Historic Preservation	NPS	National Park Service
CEQ	Council on Environmental Quality	NTHP	National Trust for Historic Preservation
EIS	Environmental Impact Statement	PA	Programmatic Agreement
FOE	Finding of Effect	PHA	Presidio Historical Association
FONSI	Finding of No Significant Impact	ROD	Record of Decision
MOA	Memorandum of Agreement	SEIS	Supplemental Environmental Impact Statement
NHPA	National Historic Preservation Act	SHPO	State Historic Preservation Officer

Preferred Alternative: The alternative that the lead federal agency believes would fulfill its statutory mission and responsibilities, giving consideration to economic, environmental, technical and other factors. CEQ regulations require the identification of a preferred alternative in the final EIS.

Proposed Action: The “proposed action” may be, but is not necessarily, the agency’s “preferred alternative.” The proposed action may be a proposal in its initial form before undergoing analysis in the EIS process. The agency may or may not have a “preferred alternative” at the draft EIS stage. In that case, the agency may decide at the final EIS stage, on the basis of the draft EIS and the public and agency comments, that an alternative other than the proposed action is the agency’s “preferred alternative.”

Undertaking: A type of federal activity that has the potential to affect historic properties.

Source: CEQ 40 Questions/ACHP Section 106 Regulations, Section-by-Section Questions and Answers