

ATTACHMENT

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FINDING OF NO
SIGNIFICANT IMPACT

JAMES
CORNER
FIELD
OPERATIONS

1 FINDING OF NO SIGNIFICANT IMPACT

PROJECT PURPOSE

The Presidio Trust, in consultation with the Golden Gate National Parks Conservancy and the National Park Service, Golden Gate National Recreation Area (NPS), is developing 14 acres of new parklands atop a dramatic bluff and at the base of the bluff extending from Lincoln Street to Mason Street in the Presidio of San Francisco (Presidio). The project has come about as the result of replacing Doyle Drive, the 75-year-old freeway leading to the Golden Gate Bridge, with the Presidio Parkway. The Presidio Parkway includes an at-grade, tunnel-covered roadway that reconnects the two most public spaces in the Presidio: the Main Post, the historic center of the Presidio, and the bay waterfront at Crissy Field. At the top of the bluff, the Visitor Center and Transit Center in existing buildings and the New Observation Post would anchor a new visitor plaza that would be designed as part of the project. The three acres at the base of the bluff, adjacent to the Crissy Field Center, would include new facilities and grounds for youth programs offered by the Trust, Conservancy and NPS. The New Presidio Parklands have the potential to become one of the most distinctive park sites in the country, welcoming a broad cross-section of local, national and international visitors to the Presidio. The site is expected to offer a high quality park experience and provide visitor-serving amenities and activities necessary to welcome the public, enrich their visit, and encourage them to return. The project was foreseen in the Presidio Trust Management Plan (PTMP), the Trust's land management plan for Area B.

This finding of no significant impact (FONSI) provides the basis for the Trust's determination that creating 14 acres of new parklands connecting the San Francisco Bay waterfront with the historic center of the Presidio (project), as analyzed in the attached New Presidio Parklands Environmental Assessment (EA), would not have a significant effect on the human environment and does not require the preparation of an environmental impact statement (EIS). A description of the proposed project and its environmental consequences are contained in the EA, which is incorporated by reference into this FONSI.

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OVERALL VISION

The new parklands will welcome all visitors and offer a profound experience of the Golden Gate. The parklands project will be a platform for programs that celebrate and provide insight into all that can be seen from this new vantage point. The new parklands will provide information and services to make visitors comfortable. The new parklands will be embraced by our community, especially those who have not had opportunities to visit our national parks, as well as by general park visitors. The new parklands will be the gateway to the entire Presidio.

PROPOSED PROJECT

The New Presidio Parklands Alternative (Alternative 3 evaluated in the EA) is the "preferred alternative" developed by James Corner Field Operations (JCFO) in partnership with the New Presidio Parklands project team. The alternative emerged from JCFO's competition-winning design and subsequent public

input. The alternative would support a range of group sizes as well as programs and experiences, from individual pursuits and small gatherings to programs, in diverse landscapes and settings. The Anza Esplanade would be extended to connect the Main Post to a Central Overlook, a central viewing and gathering point. The Observation Post (Building 211) would be demolished and replaced with the approximately 9,300 square-foot New Observation Post, conceived as an indoor-outdoor space ideal for shelter, programs and events. A new plaza (Zocalo) would function as a main social and multi-functional arrival and gathering plaza between the Transit Center and the Visitor Center. A Cliff Walk would follow the edge of the embankment and connect visitors to the wider landscape. Three overlooks would be designed with simple walls, resembling both the historic batteries along the coast and recently constructed overlooks in the Presidio. A Terraced Amphitheater stepping down from the Central Overlook would offer extraordinary bridge views, provide space for gathering, orientation, interpretation and programming, and connect the Central Overlook to the landscape below. A fully accessible Bluff Walk would traverse the embankment and connect the bluff top to Mason Street and the Learning Landscape. Stairs near the West Overlook would also connect down to the Learning Landscape. The Learning Landscape would include a renovated Crissy Field Center, a new Field Station and a new Classroom building to house additional program space. Neither building would individually exceed 5,800 square feet or 7,500 square feet in total. Key elements of the project include lawns, gardens and meadows; pathways for strolling; nooks for seating and small gatherings; three overlooks, a central interpretive feature; 43,073 square feet of building space; and 53 parking spaces.

GOALS

The project fulfills the Trust's, NPS's and Conservancy's vision for this site of the Presidio by achieving all of the following goals intended by the project purpose:

- Honor the significance of the Presidio
- Offer a magnificent experience of the Golden Gate
- Welcome all
- Integrate the natural landscape of Crissy Field and the cultural landscape of the Main Post
- Create the best place to begin a Presidio experience
- Provide exceptional environmental learning opportunities

ALTERNATIVES

The following alternatives were considered in the EA analysis or eliminated from detailed study:

ALTERNATIVE 1 – PRESIDIO TRUST MANAGEMENT PLAN UPDATE

The PTMP Update Alternative is the baseline or “no-action alternative” that was evaluated in the Doyle Drive EIS/R and anticipated in the 2002 PTMP and 2010 Main Post Update to the PTMP. The alternative would be an open, largely undifferentiated landscape that is planted primarily with native vegetation. The site would accommodate individuals and small groups. Paths would provide pedestrian north/south and east/west access. The Crissy Field Center (Building 603) would remain unchanged and the surrounding landscape would be largely native plants. The Observation Post (Building 211) would be reused for office space. Building 201 would be moved to its permanent location on the west side of Halleck Street and rehabilitated by the Presidio Parkway project. Building 210 would be rehabilitated as the new Visitor Center under a separate Trust action. Building 215 would remain as the Transit Center. Key elements of the PTMP Update Alternative include paths, an expanse of native plantings, 35,573 square feet of building space, and 124 parking spaces.

ALTERNATIVE 2 – PRESIDIO PARKWAY

The Presidio Parkway Alternative builds on the analysis contained in the Doyle Drive EIS/R and responds to the Doyle Drive Built Environment Treatment Plan and the Doyle Drive Architectural Criteria Report. The alternative would be an open and diverse landscape with differentiated areas that accommodate individuals, families, and groups of different sizes. The focal point of the alternative would be a large, civic promontory that accommodates larger groups for events and programs as well as informal gatherings. A range of opportunities would be provided for interpretation and learning. A variety of paths would offer east/west and north/south access as well as different ways to traverse and scale the bluff. The Observation Post (Building 211) would be retained for special events and public uses. Building 201 would be moved to its permanent location on the west side of Halleck Street and rehabilitated by the Presidio Parkway project. Building 210 would be rehabilitated as the new Visitor Center under a separate Trust action. Building 215 would remain the Transit Center. The Crissy Field Center (Building 603) would be retained for youth programming and the adjacent landscape would be largely native plants and lawn used for recreation and other purposes. Key elements of the Presidio Parkway Alternative include gardens, lawns, and native plantings; visitor-serving plaza, central promontory with group fire pit, and areas to gather and sit; areas for programming; 35,573 square feet of building spaces; and 87 parking spaces.

EXPAND CRISSY FIELD MARSH ALTERNATIVE

This alternative was eliminated from further study because marsh expansion in the project site would severely limit the area available for educational uses associated with the Crissy Field Center and Learning Landscape. Expanding these facilities so that the number of youth educated on the project site can be increased from approximately 23,000 per year to 50,000-60,000 per year is a key goal of the project, which supports a broader Trust goal of serving every child in San Francisco. Reaching these goals requires new educational facilities and outdoor learning environments that fill the entire project site.

Furthermore, this alternative would neither substantially improve the health nor ensure the long-term ecological viability of the marsh (refer to the 2010 Crissy Field Marsh Expansion Study prepared by Philip Williams & Associates, Ltd.). Marsh expansion in this area could also have adverse effects on other resources. Major grading would be required in an area of predicted prehistoric archaeological sensitivity for buried deposits representative of seasonal collecting activities along the margins of the San Francisco Bay and its estuary. Excavation in the area would increase the possibility of encountering native soils with the potential for disturbing archaeological resources, affecting their physical integrity. In addition, excavation could pose a risk to human health or the environment as the area is within the Commissary/PX land use control (LUC) zone, which prohibits use as a "saltwater ecological habitat area or ecological special status habitat area." Additional remediation measures would be required to mitigate the potential for exposure to contaminants.

REMOVE COMMISSARY (BUILDING 610) ALTERNATIVE

This alternative was eliminated from further consideration because it is beyond the scope of the project. The Trust intends to complete a design for the new parklands before initiating planning for the future of the former Commissary site so that it can be informed and shaped by the vision for the project. This sequence was strongly encouraged by members of the public as well as agency partners at the conclusion of the request for proposals for a cultural facility at the former Commissary site. Proceeding with the parklands project would not limit this alternative in the future.

DISPOSITION OF SIGNIFICANT ENVIRONMENTAL EFFECTS

Based upon the EA, the Trust determines that the project would not have direct, indirect or cumulative significant impacts on the human environment, with the exception of cumulative transportation impacts, which would be mitigated below significant levels. The analysis supporting this conclusion is presented in Section 4 (Environmental Consequences) of the EA. The following summarizes factors considered in this determination.

LAND USE CONSISTENCY

The project is not inconsistent with any land use plan, policies and related regulatory requirements for the area concerned. The State's (i.e., Bay Conservation and Development Commission's public access) interests have been accommodated through the project's consistency with the Trust's own land use controls and the project is fully consistent with BCDC's enforceable policies. Building removal and construction would be within the parameters for both building demolition and new construction set in the Trust's formally adopted statements of land use policy (the Presidio Trust Management Plan and the Main Post Update to the PTMP).

TRANSPORTATION

The project would contribute to anticipated unacceptable operating conditions at study intersections, particularly on weekends. Signalization would mitigate the operation of the study intersections to Level of Service D or better with or without the additional traffic generated. However, signalization would be considered only as a last resort to avoid the potential impact on historic resources. Recently expanded MUNI bus service, improved pedestrian and bicycle connections included in the project, and Transportation Demand Management (TDM) measures such as more frequent and/or extensive PresidiGo service would encourage and accommodate the use of non-automobile modes, and reduce traffic congestion at all study intersections below significant levels. Management of programs and events would minimize traffic congestion on peak days.

PARKING

The project would not significantly impact the availability of parking in the Crissy Field or Main Post districts. On most days, parking management and other TDM measures would accommodate parking demand while also encouraging use of non-automobile modes. Management of programs and events would minimize impacts on peak days.

VISITATION

The project would allow visitors to begin using a new area within the park. The new parklands would improve connectivity to and between adjacent areas in the park, facilitate the visitor experience, and increase opportunities for visitor understanding of the Presidio. The project site design would ensure that visitor use impacts are minimized, and management actions would be available to ensure that park resources are protected.

HISTORIC RESOURCES

The project would not have a direct or indirect adverse effect on the National Historic Landmark District. The new parklands would result in a visible change to the landscape when viewed from contributing

resources in the project area, due primarily to new construction, building rehabilitation and expansion and key project landscape elements. However, conformance with applicable guidelines and planning documents would ensure that the design and construction of the buildings are consistent with the Secretary's Standards, resulting in a new structure or structures that are compatible with the character defining features of the NHLD and its contributing resources, including the setting and feeling of the NHLD in the project area. The key landscape features would be compatible with the established design criteria and would therefore enhance the qualities and characteristics of the project area and the NHLD as a whole.

ARCHAEOLOGICAL RESOURCES

The project would not likely adversely affect any known or predicted archaeological properties in the project area. Archaeological resources would be protected by adhering to procedures outlined in the Presidio Trust Programmatic Agreement. Archaeological monitoring of ground disturbing activities during construction would ensure that there are no adverse effects to known or predicted archaeological areas or any deposits that are inadvertently discovered during construction. An Archaeological Monitoring Plan would guide this monitoring once design is complete and before construction commences. Archaeological Treatment Plans for individual sites and the AMP would ensure that any discoveries are handled in accordance with all stipulations of the PTPA.

VISUAL RESOURCES

The project would improve the visual character of the project site through removal of construction fencing, covering exposed tunnels, revegetating staging areas, and recreating the bluff. Landscape design changes would be compatible with the existing natural and structural elements of the setting. Given their relatively small bulks, heights, and masses, and through adherence to established design guidelines, new structures would also be compatible with the natural and structural elements of the visual setting.

LIGHT AND GLARE

The project would minimize light pollution. Code-required lights would be high efficiency, low glare, downcast and shielded fixtures per the current California Building Energy Efficiency Standards California and LEED V2.2 guidelines for new lighting. Site and parking lot lighting would be installed following the same principal concerns as building and path of travel lighting. The Trust would review both the interior and exterior lighting designs to ensure consistency with PTMP policies regarding light and with guiding principles set forth in Trust standard measures for lighting. Best lighting practices would be reviewed to avoid light trespass into adjacent natural areas.

BIOLOGICAL RESOURCES

The project would have no effects on special-status plants or sensitive natural communities, including jurisdictional wetlands, as none occur within the project area. Measures identified in the PTMP ROD and VMP would be implemented to avoid or minimize temporary adverse effects related to the spread of non-native and invasive plant species, resident and migratory birds, roosting bats, and other resident wildlife species during construction. The project site's wildlife habitat value would increase through native plants in the designed landscape. Best bird-safe building practices would minimize the potential for adverse effects on resident and migratory birds due to any new construction and new sources of lighting.

WATER RESOURCES

The project's water demand would increase the Presidio's annual consumption by an insignificant amount (approximately 1.0 percent). Landscapes would be planned, designed, installed, managed and maintained to promote the conservation and efficient use of water and to prevent the waste of this valuable resource. Water irrigation systems would allow for the future use of recycled water. Stormwater management practices would be integrated into the landscape and grading design plans to minimize runoff and to increase on-site rainwater retention. Multiple best management practices would be used to control erosion and prevent sediment from entering Crissy Field Marsh and the San Francisco Bay.

ENVIRONMENTAL SUSTAINABILITY AND CLIMATE PREPAREDNESS

The project would be consistent with Trust sustainability and climate preparedness priorities. Adoption of site-specific strategies to further the goals of the Trust's Climate Action Agenda would anticipate changes at the site and surrounding areas that may result from climate change. Incorporating sustainability considerations into resilience planning would also help prepare for and adapt to the effects of climate change. Irrigated turf would be limited to programmatic spaces, scaled to particular types of experience and activity. Irrigation systems would be installed to anticipate recycled water availability.

HAZARDOUS SUBSTANCES

The project would have no significant impacts to human health, safety and the environment due to hazardous substances because the risk of human exposure is low and precautionary measures would be implemented as necessary. Implementation of new site uses and soil disturbing construction in the Commissary/PX Land Use Control area as part of the project would be subject to regulatory approval of planned land use changes and remedial actions (as required) in advance of construction. Should the land use include ecologic habitat and facilities considered sensitive uses, additional remediation to remove and/or cap contaminated soil would ensure protection of human health and the environment. For areas where the LUC would remain in effect, the Trust would continue annual monitoring and reporting.

CUMULATIVE IMPACTS

The project, in combination with other cumulative projects, would have varying levels of beneficial and adverse effects depending on the resource and the individual project. In general, the projects would contribute to the Presidio's ongoing transformation into a welcoming, more visually interesting, accessible, and engaging environment that provides meaningful experiences for visitors from around the world. Vehicles associated with cumulative projects would increase the total number of peak hour trips at the Main Post and Crissy Field by approximately 7 percent on weekdays and 10 percent on weekends. However, with the adoption of TDM measures and implementation of intersection improvements, impacts would be reduced below significant levels. Parking at the Main Post and Crissy Field would be sufficient to accommodate demand, but due to seasonal variation in park visitation, parking supply may be exceeded in some areas on peak weekend days. Visitor opportunities and access to park resources would be expanded, and a wider audience would be engaged. Conditions would be expected to be busy on most weekdays and weekends with only minor crowding. However, even with application of visitation measures, visitors may be displaced to other recreational areas within the park or other nearby city or GGNRA sites where similar visitor experiences are available.

MITIGATION MEASURES TO AVOID OR MINIMIZE POTENTIAL ADVERSE ENVIRONMENTAL IMPACTS

The Trust commits to carrying out all practicable mitigation measures identified in the EA to avoid or minimize environmental impacts that could result from constructing the project. The mitigation measures are discussed in detail at the beginning of Section 4 (Environmental Consequences) and include all relevant avoidance, minimization, and/or mitigation measures adapted from the Doyle Drive, PTMP and Main Post Update RODs, and measures informed by the EA review process and considered for impacts that by themselves were not considered significant. Mitigation measures include elements which will be integral components of the project's design, continued coordination with other public agencies as warranted, implementation of standardized best management practices during and following construction, and other possible efforts. As part of the decision to construct the project, the Trust will adopt a monitoring and enforcement program (MEP) to ensure that mitigation commitments are implemented. The Trust's Project Manager will be responsible for monitoring compliance with the MEP and the effectiveness of mitigation commitments. The status and results of mitigation monitoring will be made available to other agencies and the public upon request.

PUBLIC INVOLVEMENT

The Trust viewed public participation in the development of the project as critical to its success. The outreach program offered more numerous and frequent feedback opportunities than any other Presidio planning effort to date. Public outreach for the project was initiated on September 4, 2014 at a public forum that featured the release of creative visions by five renowned firms selected by the Trust to develop design concepts for the parklands. From the concepts that emerged from the design firms and ideas generated by the public during this early phase of the project, the Trust and JCFO explored and refined designs to develop the range of alternatives for environmental review. The Trust announced the beginning of public scoping pursuant to the NEPA on February 29, 2015 with the release of the Notification of Intent to Prepare an Environmental Assessment / Invitation to Participate and Comment (Trust 2015d). At a March 21, 2015 workshop, the Trust presented 3 preliminary concept designs for the new parklands, which formed the basis of the final concept design evaluated in the EA, and the two alternatives. The Trust accepted comments at a public Board of Directors meeting held on May 14, 2015 at which time the draft concept design was introduced, and presented the final concept design at a public Board of Directors meeting held on October 8, 2015. While scoping to assist in the preparation of the EA ended on June 1, 2015, comments directed toward the project were welcomed through early October 2015. Between September 2014 and October 2015, the Trust engaged over 40,000 individuals and received over 2,000 comments on the project. A complete discussion of the public review process for the project is provided in Section 2 (Public Participation and Agency Consultation) of the EA.

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NATIONAL HISTORIC PRESERVATION ACT CONSULTATION

Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires the Trust to take into account the effect of its undertakings on historic resources, including the Presidio National Historic Landmark District (NHLD). As a result of the consultation for the PTMP, the Trust entered into a Programmatic Agreement (PTPA) with the State Historic Preservation Officer (SHPO), the Advisory Council on Historic Preservation (ACHP), the NPS (signatory parties) and the National Trust for Historic Preservation (2002, updated 2014) that applies to the proposed undertaking. The PTPA provides a framework for reviewing different types of projects under NHPA in coordination with the NEPA, and for consulting with other parties under certain circumstances.

At the request of the SHPO, the Trust initiated consultation on the undertaking during the project's request for proposals phase. Consistent with the PTPA and ACHP regulations that recommend early integration of Section 106 compliance with NEPA and other agency processes, subsequent steps in the NHPA process have been coordinated with the NEPA process, including public scoping and release of the EA. The Trust also provided the draft New Presidio Parklands Supplemental Design Guidelines to the PTPA parties for their review, and conducted outreach to Native American contacts that may have

an interest in the project. The Trust will submit the EA, a preliminary finding of “no adverse effect” and any comments received on the EA to the PTPA parties, and will seek consensus that the undertaking will not adversely affect historic properties in the NHLD prior to any execution of a finding of no significant impact (FONSI).

FINDING

The Trust has considered the information and analyses in the environmental assessment and supporting environmental documentation, the comments of agencies and the public, and the project’s administrative record. Based on Trust regulations on environmental quality (36 CFR 1010), PTMP policies, monitoring, and experience, including prior significance determinations documented in previous NEPA decisions and the adoption of mitigation measures outlined in the EA, it is the determination of the Trust that the project is not a major federal action having the potential to significantly affect the quality of the human environment. There are no significant direct, indirect or cumulative effects on public health or safety, sites listed on the National Register of Historic Places, or other unique characteristics of the region. The project is neither scientifically nor publicly controversial. Implementation of the project will not involve unique or unknown risks, cause loss or destruction of noteworthy park resources, or violate any Federal, State or local law. Implementation of the project is not precedent-setting nor will it automatically trigger other actions which may require environmental impact statements. The project is fully consistent with the BCDC’s enforceable policies. Therefore, in accordance with the National Environmental Policy Act of 1969 and regulations of the Council on Environmental Quality, an environmental impact statement will not be prepared. The Trust will implement the project, construction of the New Presidio Parklands, at the earliest possible time.

RECOMMENDED:

John Pelka
Compliance Manager, Presidio Trust

Date

APPROVED:

Andrea M. Andersen
Acting General Counsel, Presidio Trust

Date