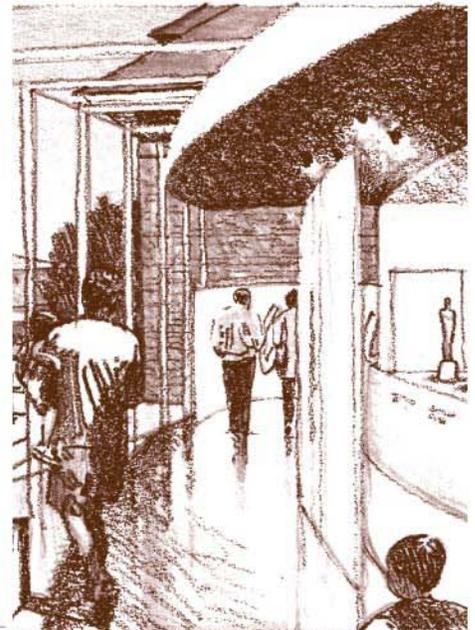
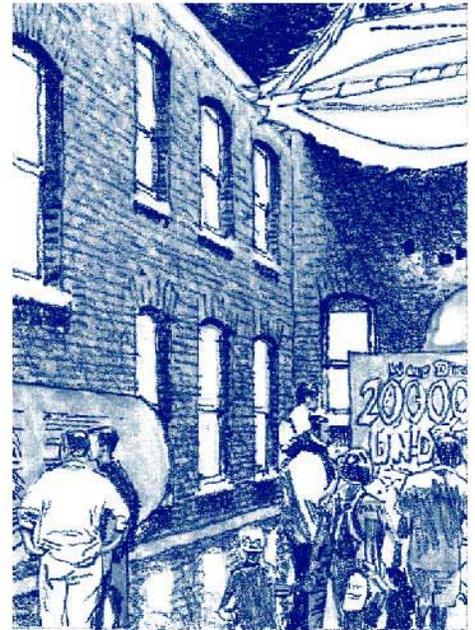
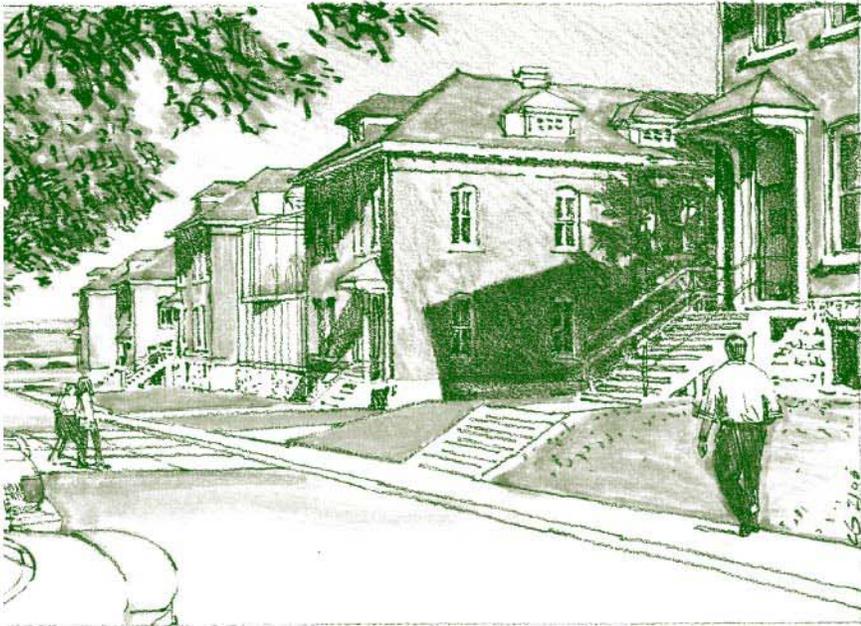




THE WALT DISNEY FAMILY MUSEUM

BUILDINGS 104, 122, AND 108
PRESIDIO OF SAN FRANCISCO



Illustrations by Chris Grubbs

Environmental Assessment

"As part of the Golden Gate National Recreation Area, the Presidio's significant natural, historic, scenic, cultural and recreational resources must be managed in a manner which is consistent with sound principles of land use planning and management, and which protects the Presidio from development and uses which would destroy the scenic beauty and historic and natural character of the area and cultural and recreational resources."

FROM THE PRESIDIO TRUST ACT (P.L.104-333)

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FINDING OF NO SIGNIFICANT IMPACT

1 Need for the Proposed Action

The overall objective of the proposed Walt Disney Family Museum is to rehabilitate and adaptively reuse Buildings 104, 122 and 108 as a museum, archive and office space by the Walt Disney Family Foundation (WDFF or tenant), a non-profit organization that has been a tenant at the Presidio since 2001. The proposed action would be dedicated to honoring the life of Walt Disney. The following explains the need for the action.

BACKGROUND

The Presidio Trust (Trust) is the federal agency charged with protection and management of the 1,168-acre inland portion of the Presidio of San Francisco (Presidio) known as Area B (see back cover). The Trust is rehabilitating and reactivating the former army post's historic buildings and landscapes as a part of the nation's largest and most visited national park in an urban area.

The "Defender of the Gate" from 1776 until 1994, the Presidio was a military garrison for almost 220 years. In 1776, the Spanish founded El Presidio to prevent Russia and Britain from establishing a presence on San Francisco Bay. From 1822 to 1835, the Presidio became the northernmost outpost of an independent Mexico, and in 1846, during the Mexican-American War, the United States occupied the then derelict Presidio. Over time, the U.S. Army fortified, developed and landscaped the Presidio as America's premier military post on the West Coast. The Presidio is a showcase of military architecture dating from the 1860s to the Cold War era, and was designated a National Historic Landmark District (NHLD) in 1962. The Presidio contains over 800 buildings, of which approximately 470 are historic and contribute to its status as a NHLD. In addition, the Presidio contains significant cultural landscapes, including a 300-acre historic forest, designed landscape areas, and formal public open spaces such as the Main parade grounds. These historic elements are complemented by important natural features, spectacular vistas and recreational opportunities.

In 1994, the Presidio was transferred from the U.S. Army to the National Park Service (NPS). Following the passage of the Presidio Trust Act (P.L. 104-333) in 1996, Area B came under the jurisdiction of the then newly created Trust in July 1998. The Trust is a federal agency established by Congress and overseen by a presidentially appointed board of directors. The Trust's mission is to preserve and enhance the cultural, natural, scenic, and recreational resources of the Presidio for public use in perpetuity, and to achieve long-term financial sustainability. The Trust generates revenues by leasing the park's historic and non-historic buildings. All revenues are used to support park operations, resource protection and park enhancement projects.

Protecting the historic character and integrity of the NHLD while allowing the changes that would maintain the Presidio's vitality was identified as an important objective in the Presidio Trust Management Plan (PTMP), the Trust's comprehensive land use plan for Area B adopted in 2002. The PTMP envisions the Main Post to remain as the heart of the Presidio, and calls for preserving and rehabilitating its historic buildings, while allowing some new construction for adaptive and feasible uses.

STATEMENT OF NEED

Originally built in 1896-1897 as barracks, **Building 104** is part of a series of six major barracks buildings that define the western edge of the Main parade grounds on the Main Post. The building is approximately 39,000 gross square feet (gsf).¹ **Building 122**, the former Post Gymnasium, was constructed in 1904 and is approximately 13,400 gsf. The building is located at 122 Riley Avenue behind Building 104. **Building 108**, erected in 1940 for \$4,000 for storage and as an electric shop, is a small (approximately 1,200 gsf), utilitarian, single-story building of stucco-clad reinforced concrete construction that is located between Buildings 104 and 122. The WDFP proposes to lease Buildings 104, 122 and 108 as a museum, archive and office space to provide a rich source of information on the life and work of Walt Disney. Lease revenue would contribute to the Presidio's financial viability.

This proposed action is needed in order to:

- 1 Protect and enhance historic buildings that are a contributing feature to the NHLD, and prevent further and irreversible deterioration of the buildings caused by vacancy, through rehabilitation and use of the buildings
- 2 Bring the buildings up to safe occupancy standards consistent with applicable building codes and rehabilitation standards for historic buildings, and correct major deficiencies such as fire, life/safety and seismic hazards
- 3 Help support a public use goal of the Presidio to make the park welcoming to a wide range of visitors and contribute to the PTMP vision of the Main Post as a focal point for visitor orientation, and a setting for businesses, organizations and Presidio community services
- 4 Implement leasing goals of the Trust consistent with the requirements of Section 104(n) of the Presidio Trust Act²

PURPOSE AND CONTENTS OF ENVIRONMENTAL ASSESSMENT

This environmental assessment (EA) identifies the environmental effects of the proposed Walt Disney Family Museum within Buildings 104, 122 and 108 at the Main Post district. The Council on Environmental Quality's (CEQ) regulations implementing the National Environmental Policy Act (NEPA) allow federal agencies such as the Trust to prepare an EA to assist agency planning and decision-making (40 CFR 1501.3). An EA provides evidence and analysis to determine whether an environmental impact statement (EIS) is required, aids a federal agency's compliance with the NEPA when an EIS is not necessary, and facilitates preparing an EIS if one is necessary (40 CFR 1508.9(a)).

This EA tiers from the PTMP EIS and analyzes specific action alternatives for preserving and rehabilitating one of the Main Post's historic buildings, an implementation activity and goal identified in the PTMP.³ In tiering from

¹ Based on I.B.C. Section 1002.1.

² Section 104(n) of the Trust Act requires the Trust, in managing and leasing the properties transferred to it, to "consider the extent to which prospective tenants contribute to the implementation of the General Objectives of the General Management Plan for the Presidio and to the reduction of cost to the federal government. The Trust shall give priority to the following categories of tenants: Tenants that enhance the financial viability of the Presidio and tenants that facilitate the cost-effective preservation of historic buildings through their reuse of such buildings."

the PTMP EIS, the EA summarizes and incorporates by reference the information and analysis presented in the PTMP EIS and concentrates on site-specific issues related to the current project. PTMP EIS mitigation measures that have been incorporated into the current project are also discussed. The EA is divided into five sections:

- 1 Purpose and need for the proposed action
- 2 Description of the proposed action and alternatives considered, including a no action alternative
- 3 Affected environment and environmental consequences of the proposed action and alternatives, including mitigation measures
- 4 A synopsis of agencies, organizations, and persons consulted; and issues raised during consultation, and
- 5 A summary of the public involvement process, including responses to comments made during scoping

The EA serves as the factual support for the conclusions in the attached draft finding of no significant impact (FONSI) (approved September 20, 2006). The EA/FONSI will be made available for public review for a minimum of 30 days before the Trust makes its final determination whether to prepare an EIS and before the proposed action may begin.

³ The coverage of general matters in broader EISs, with subsequent narrower tiered statements or environmental analyses, incorporating, by reference, general discussions and concentrating solely on the issues specific to the statement subsequently prepared (40 CFR 1508.28). The CEQ NEPA Regulations encourage the use of tiered documents to "eliminate repetitive discussions of the same issues" (40 CFR 1502.20) and to "focus on the issues which are ripe for decision and exclude from consideration issues already decided or not yet ripe" (40 CFR 1508.28(b)). The PTMP EIS can be viewed at the Presidio Trust Library, 34 Graham Street, San Francisco, California or on the Trust's website at <http://www.presidio.gov/Trust/Documents/EnvironmentalPlans/>.

2 Description of Proposed Action and Alternatives

The following describes the proposed action and the alternatives.

PROPOSED ACTION

Under the proposed action, **Building 104** would be rehabilitated by the WDFP for reuse primarily as a museum. About two-thirds of the museum exhibits would be housed in the existing basement, first and second and attic floors of the building, and approximately one-third would be housed in a new three-level structure consisting of approximately 16,900 square feet that would infill the existing courtyard on the west side of the historic building. **Building 122** would be rehabilitated for reuse to house art registration, scholarly research, archiving/storage, and administrative, education and outreach functions. **Building 108** would be rehabilitated to house much of the mechanical equipment that would support heating and cooling in Buildings 104 and 122. Building 108 would not be occupied. The project site consists of all the land on which the three buildings sit, together with the space that connects them on either side of Taylor Road. The site would be landscaped and developed to include perimeter planting around the three buildings; surface parking for 64 cars; walks and stairs. A geothermal heat transfer grid (if feasible) would lie beneath the site. A breakdown of the building uses is as follows:

USE	SQUARE FEET
CULTURAL / EDUCATIONAL (Display, Exhibit, Learning Activity):	24,757
CONFERENCE (Assembly, Lecture Hall):	3,097
RETAIL:	1,518
OFFICE:	6,438
STORAGE:	2,435
MAINTENANCE / INFRASTRUCTURE / CIRCULATION:	<u>17,757</u>
<i>Total Uses</i>	<u><u>56,002</u></u>

The project site plan is shown in Figure 1. A complete description of the proposed action is provided in the July 5, 2006 Walt Disney Family Museum Project Manual prepared by the WDFP's architect and available for review in the Presidio Trust Library.

NO ACTION

Under this alternative, the proposed action would not be implemented now or in the future. Buildings 104, 122 and 108 would remain vacant and there would be no building rehabilitation or new construction. The buildings would remain deactivated for an extended period of time, and protected from weather, stabilized and secured from vandalism as funding permits through a process known as "mothballing."

PTMP USES WITH NO BUILDING 104 ADDITION

Under this alternative, Buildings 104, 122 and 108 would be rehabilitated for cultural/educational/office use but Building 104 would not include an infill addition as described above.

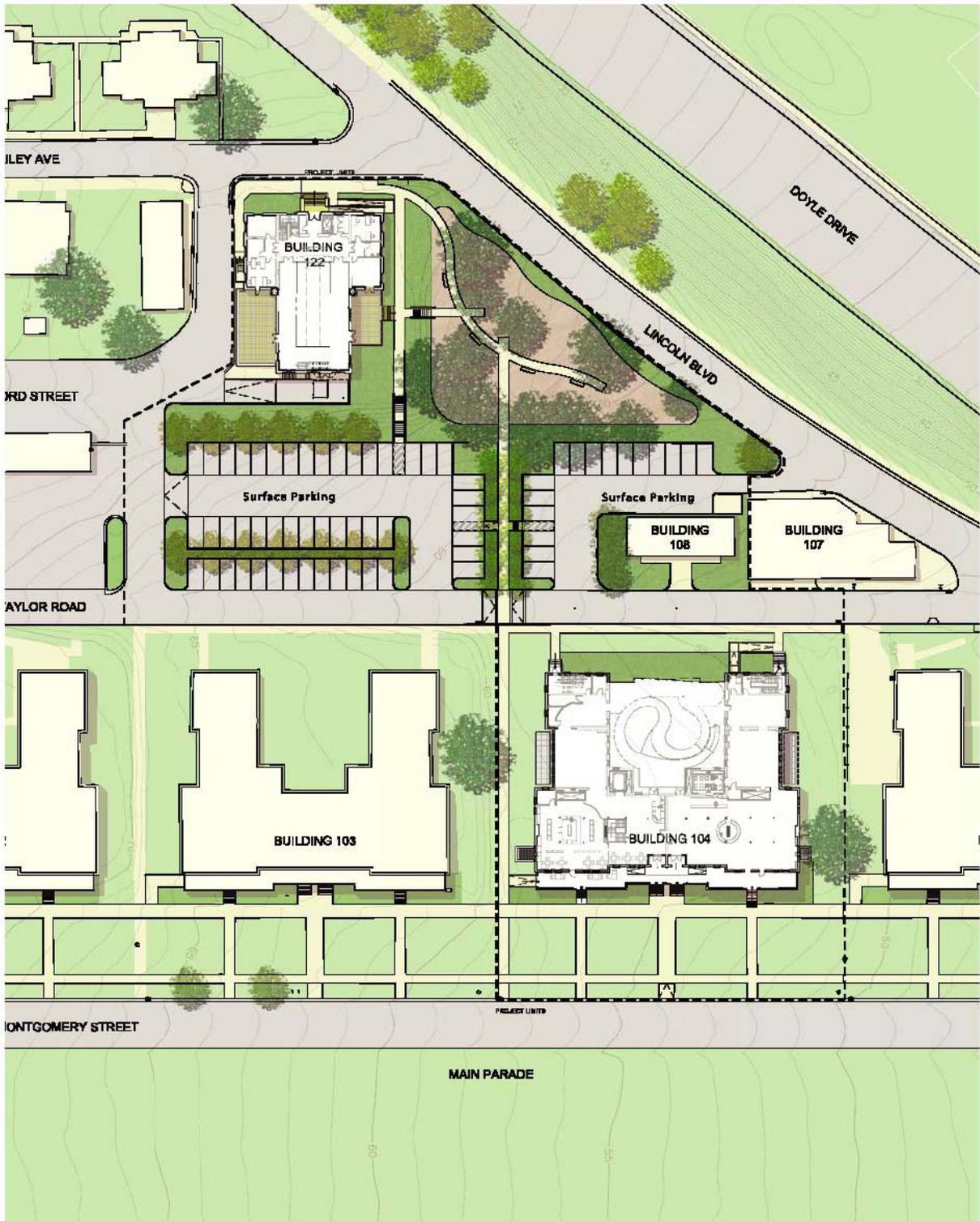


FIGURE 1: PROJECT SITE PLAN

Source: The Office of Cheryl Barton, 2008

3 Environmental Impact of the Proposed Action and Alternatives

The following describes the environmental impacts of the proposed action and each alternative. For each impact topic, a summary of the issues discussed in the PTMP EIS is provided followed by a site-specific analysis of impacts of the proposed action and alternatives.

CULTURAL RESOURCES

SUMMARY OF PTMP EIS IMPACT ANALYSIS:

The potential impacts of building rehabilitation and new construction within the Presidio on historic resources, including the NHLD are assessed on pages 199 through 202 of the PTMP EIS. The analysis presents a discussion of proposed changes within the Main Post including the maximum allowable new construction (110,000 sf) and demolition (20,000 sf). The analysis assumes that historic buildings would be rehabilitated and returned to active use, and additions to historic buildings may be necessary to make their reuse feasible.

The analysis concludes that the overall effect of future actions on historic resources would be beneficial. Rehabilitation and reuse of historic buildings would comply with the Guidelines for Rehabilitating Buildings at the Presidio of San Francisco, and the Secretary of the Interior's Standards for the Rehabilitation of Historic Properties (Standards) (Mitigation Measure CR-7 *Compliance with Standards for Building and Cultural Landscape Rehabilitation*). The Secretary of the Interior's Standards would direct the manner in which historic buildings are altered, in order to ensure that historic integrity is retained and to ensure that the rehabilitation is below the threshold of an adverse effect. Every reasonable effort would be made to incorporate compatible adaptive uses that require minimal alteration of the character defining materials, features, spaces and spatial relationships of historic buildings and their settings, while meeting financial and other goals. Building-specific assessments of existing conditions, their character-defining features, and physical history reports would aid in the successful rehabilitation process. Historic building rehabilitation would be reviewed consistent with the Programmatic Agreement (PA) that constitutes the Trust's compliance with Section 106.

New construction would be compatible with the NHLD through elements of building design, density, massing and character-defining features of the surrounding historic setting. Every reasonable effort would be made to adapt historic properties to new uses and to minimize new construction. New construction would primarily be undertaken as a means to encourage reuse of historic buildings: to enhance the function of an existing historic building; or to make their rehabilitation and reuse economically viable. New buildings would be sited to minimize impacts on adjacent resources and be designed to be compatible with the historic setting.

The Trust would use criteria and processes outlined in the PA in determining effects and pursuing consultation with the NPS, the Advisory Council on Historic Preservation (ACHP), the California State Historic Preservation Officer (SHPO) and other parties, as necessary, for actions that could adversely effect historic resources. Through the application of Planning Principles (pages 2 through 30 of the PTMP), Planning Guidelines for the Main Post District (pages 65 through 69 of the PTMP), and Section 106 consultation as described in the PA

(including consultation regarding site-specific design guidelines and/or schematic designs for new construction), the Trust would ensure that new construction is compatible with the existing historic setting, and that the integrity of the NHLD is not impaired (Mitigation Measure CR-4 *Demolition and New Construction*). Historic landscape rehabilitation would also conform to the Secretary of the Interior's Guidelines for the Treatment of Cultural Landscapes.

SITE-SPECIFIC IMPACT ANALYSIS OF PROPOSED ACTION AND ALTERNATIVES:

PROPOSED ACTION Buildings 104, 122 and 108 and their associated cultural landscape are contributing elements to the NHLD. Building 104 has been remodeled over the years by the U.S. Army and in 1984 was extensively remodeled by the Federal Emergency Management Agency (FEMA). FEMA gutted the interior of the building and rebuilt the northern half into offices. The southern half of the building remains unimproved. Significant changes have also occurred to Building 122, including the introduction of a concrete second floor and thus the loss of its original double-height gymnasium space in the 1970s.⁴

*The proposed action would not have an adverse effect on the NHLD.*⁵ Historic fabric to be removed in Building 104 would include the rear porch and one of the existing stair shafts. The other stair shaft would be extended vertically to accommodate an elevator run to the attic. In the gymnasium of Building 122, the non-historic second floor would be removed and interior wood wainscoting may be removed to accommodate the structural upgrade. The existing front steps are non-compliant with the Americans with Disabilities Act (ADA) and may have to be rebuilt in order to accommodate the landing of an accessibility ramp at the front entrance since all public visitors would arrive through the building's main front entrance. All alterations and related building rehabilitation would be consistent with the historic preservation goals described in the Secretary of the Interior's Standards and the Guidelines for Rehabilitating Buildings at the Presidio of San Francisco.

Additional floor area in the form of a new, approximately 16,900-square foot, 3-level courtyard addition is proposed to house functions of the intended use that cannot be readily accommodated in the historic structure and to unify the exhibition space of the museum. The infill addition would occur at the rear of the building, set back from the rear wall, and would allow the original "U" shaped building to be visible. The volume of the infill addition would remain below the eave line of the existing sloped roof in order to support the prominence of the existing building and the pattern of development along Taylor Road. The design of the infill addition would be in keeping with standard ten of the Secretary of the Interior's Standards, which requires that new work must be differentiated from the old and be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the building and its surroundings.

Other non-historic elements that would be introduced include landscaping surrounding the buildings, a reconfigured parking area, and a new loading dock and ramp on the east side of Building 122. These new elements would retain the overall character of the cultural landscape and the individual character of each

⁴ Cf., Buildings 104, 108 & 122 Conditions Assessment prepared by Page and Turnbull, n.d.

⁵ An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association (36 CFR 800.5(a)).

building and be consistent with the treatment recommendation of the 2002 Cultural Landscape Assessment for the Main Post.

Early discussion with the SHPO on the proposed action determined that Section 106 consultation and review of rehabilitation plans for compliance with the Secretary of the Interior's Standards would be accomplished pursuant to stipulations V through VII of the Trust's executed PA.⁶ In accordance with those stipulations, Trust professional staff will review the project to ensure conformance with the Secretary of the Interior's Standards. Due to the visibility of the undertaking, the Trust will invite comment from the PA parties even though such review is not required under the PA. Comment from PA parties will be included along with that of Trust professional staff in order to ensure that the undertaking has no adverse effect on the historic resource. Neither the Trust nor the WDFW would make any irrevocable commitment regarding project design until consultation under Section 106 has been concluded.

NO ACTION If the currently vacant historic buildings are not rehabilitated, historic materials would deteriorate and the buildings would not survive indefinitely in their present condition. No repair to historic materials would occur (mortar repointing, window repair and restoration, masonry anchoring and repair). Notwithstanding the best efforts to safeguard the building, this could result in the deterioration of historic fabric and decay of the buildings over the long-term.

PTMP USES WITH NO BUILDING 104 ADDITION This alternative would require minimal alteration of the character-defining materials, features, spaces and spatial relationship of Building 104 and its setting. Rehabilitation of Buildings 104, 122 and 108 would comply with the Secretary of the Interior's Standards.

ARCHAEOLOGICAL RESOURCES

SUMMARY OF PTMP EIS IMPACT ANALYSIS:

The potential impacts of building rehabilitation and new construction within the Main Post district on both prehistoric and historic archaeological sites⁷ were analyzed on pages 215 through 217 of the PTMP EIS. As a result of two centuries of military development and early relic collecting, there are few, if any, surface indications of prehistoric sites. While only three sites have been recorded at the Presidio, all within the Crissy Field district, the potential for discovering additional prehistoric archaeological resources at the Presidio is high because of the extensive freshwater resources and the large estuarine lagoons and sloughs that once extended along the waterfront areas. In addition to the known sites along Crissy Field, the PTMP EIS identified the Main Post as one of several areas as archaeologically sensitive for the discovery of prehistoric sites.

Historic sites are known to exist and are concentrated at various locations throughout the Presidio. At the Main Post, the historic properties represent a variety of types and include the site of El Presidio de San Francisco,

⁶ Also refer to Section 4 (Agencies and Persons Consulted) of this EA.

⁷ The PTMP EIS defines prehistoric sites as the physical evidences of Native American occupations prior to European colonial contact. These native peoples and their descendants were the first inhabitants of the Presidio. Today some of the descendants are known as the Ohlone. Historic sites are the physical evidences, usually augmented by written documentation, of the Spanish, Mexican, and American occupations which began in 1776, and could also include evidence of the Ohlone and other native peoples who occupied the Presidio in the 18th and 19th centuries.

the single most important archaeological site in the park, a Spanish/Mexican cemetery, staff, laundress and enlisted quarters, a quartermaster complex, a sutler⁸ residence and sutlery, and four other properties. Archaeological monitoring and preconstruction inspections are being completed by the Trust for most actions involving ground disturbance to allow archaeologists to make informed decisions about the likelihood of the presence of archaeological resources in a particular area prior to the approval of such activities.

The PTMP EIS analysis concluded that building demolition, new construction, infrastructure upgrades, and pavement or vegetation removal within the district could adversely affect archaeological sites. Guidelines in the PTMP and measures contained in the PA would help avoid or mitigate potential adverse impacts on sites, including preparing and implementing a monitoring program to discover, document and protect predicted sensitive archaeological areas prior to construction (Mitigation Measure CR-9 *Ground Disturbing Activities*).

SITE-SPECIFIC IMPACT ANALYSIS OF PROPOSED ACTION AND ALTERNATIVES:

PROPOSED ACTION *The proposed action would not affect any known or previously identified archaeological properties in an unanticipated manner.* Historical research indicates that the project site has been the site of activity from the early nineteenth century to the present. Originally occupied by laundresses' buildings, the site has subsequently been the location of sheds, privies, brick barracks and a variety of other buildings of unknown function. Most recently, a majority of the project site has been used as a parking lot. Although the development of the site has impacted the archaeological remains of past activities, recent testing⁹ revealed that layers of historic soils as well as intact features exist beneath the asphalt and base rock of the current parking lot.

Due to the possibility to encounter intact historic features within the project site during ground-disturbing activities such as infrastructure upgrades, infill construction and landscaping, planned subsurface excavation for the proposed action would be monitored by a qualified archaeologist approved by the Trust. As part of this monitoring program, excavation within the project site would commence with the removal of the layers of asphalt and base rock. Once the soils beneath the base rock have been revealed, intact features or artifacts may be identified, recorded, and evaluated. Subsequent ground disturbance would be monitored. If historic features or artifacts are encountered, the archaeologist, in consultation with the Trust, would have the authority to halt construction until the find can be identified, recorded and evaluated.

Prior to the initiation of construction or ground-disturbing activities, all construction personnel would be alerted to the possibility of buried cultural remains. This includes prehistoric and/or historic resources. Personnel would be instructed that the archaeologist on site has the ability to stop work in the immediate vicinity of any find. Once the find has been identified, plans for treatment and for the evaluation and mitigation of impacts to the find, if they are found to be National Register of Historic Places or California Register of Historical Resources eligible, would need to be developed.

If human remains are encountered during construction, work in that area would halt and the San Francisco County Coroner would be immediately notified. If the remains are determined to be Native American, then the

⁸ A supplier of victuals or supplies to an army.

⁹ Cf., Archaeological Testing Report for Disney Presidio Project prepared by Pacific Legacy, Inc., dated July 24, 2006.

Native American Heritage Commission (NAHC) would be notified within 24 hours as required by Public Resources Code 5097. The NAHC would notify the designated Most Likely Descendant who would provide recommendations for the treatment of the remains within 24 hours.

NO ACTION Under this alternative, maintenance of the buildings and grounds would have minimal or low potential for affecting archaeological resources. No known or previously identified archaeological property is likely to be affected.

PTMP USES WITH NO BUILDING 104 ADDITION No new construction is proposed under this alternative. Direct effects on archaeological resources would be limited to ground-disturbing activities resulting from infrastructure upgrades and landscaping. Measures identified as stipulations of the PA and committed to as part of project implementation would avoid or minimize harm to archaeological resources.

BIOLOGICAL RESOURCES

SUMMARY OF PTMP EIS IMPACT ANALYSIS:

Biological resources within the Main Post district are identified on pages 83 through 119 of the PTMP EIS and page 77 of the PTMP. The Main Post consists primarily of landscape vegetation that provides a rich cultural context and a unique historic sense of place, which sharply contrasts with the Presidio's forests and native plant communities. The Main Post's vegetation can be characterized by ornamental trees (of which some are specimen species), expansive open grassy areas (such as the unpaved Main parade grounds), maintained lawns, and flowering foundation planting or low hedges. The landscaped vegetation generally has low wildlife value. However, some of the ornamental plantings, such as the eucalyptus and palms, despite their introduced status, offer fruits, berries and shelter that attract year-round resident and migrant birds. As shown on page 89 of the PTMP EIS, no native plant communities or species occur on the Main Post.

The potential impacts of development within the Main Post are analyzed on pages 220 through 238 of the PTMP EIS, and in the 2002 U.S. Fish and Wildlife Service (USFWS) Biological Opinion. The analyses assumes that no construction activities (such as placement of fill material, mechanized land clearing, land leveling and road construction) would occur beyond existing developed areas and no existing natural habitat would be displaced. The PTMP EIS analysis indicates that future uses would be subject to the mitigation measures identified in the EIS and the "minimization measures" included in the Biological Opinion, as well as site-specific planning and environmental review that would take place prior to any substantial construction or demolition. The mitigation measures include:

- Restricting the use of non-native invasive plant species (Mitigation Measure NR-1 *Native Plant Communities*) and
- Conducting bird and bat surveys of potentially impacted buildings and grounds prior to construction to assess the potential for any sensitive wildlife species (Mitigation Measure NR-9 *Wildlife and Wildlife Habitat*)

SITE-SPECIFIC IMPACT ANALYSIS OF PROPOSED ACTION AND ALTERNATIVES:

PROPOSED ACTION *The proposed action would not substantially alter any native plant community or wildlife habitat.* Buildings 104, 122 and 108 are located within the designed landscape of the Main Post. The landscaped area immediately surrounding Building 104 was replanted in the mid-1990s with historically appropriate plantings of discontinuous low flowering shrubs and small ornamental trees. In addition, a mature cypress tree is situated on the southeast side of Building 104. The ornamental shrubs within the project site would not be disturbed during bird nesting season unless Trust monitoring indicates nesting birds are not present. The cypress tree would be fenced during construction and protection measures in the Trust's Tree Preservation Specifications would be followed in order to minimize effects to the tree root systems as much as possible.

Since preparation of the PTMP, a small colony of Cliff Swallows (*Petrochelidon pyrrhonotahave*) has been known to nest on the Montgomery Street barrack buildings.¹⁰ Per Mitigation Measure NR-9, if construction is proposed during the breeding season, no earlier than three days before the start of work,¹¹ a qualified wildlife biologist would survey for the presence of swallows at and within the immediate vicinity of the planned work. If active nests are present, the project would be redesigned or project timeline modified in accordance with the biologist's recommendations to avoid take. If avoidance is not feasible, the USFWS would be consulted under the Migratory Bird Treaty Act. The Trust will work with the tenant to ensure that museum activities avoid or minimize, to the extent practicable, adverse impacts on migratory birds.

Prior to construction, the buildings would be visually investigated by qualified personnel to determine if bats are using the structure for roosting. Should any sign of bats be identified, recommendations would be made on how to minimize impacts and disturbance to bat roosts and how best to mitigate any impacts to the bat population.

NO ACTION Under this alternative, there would be no alteration to native plant or wildlife habitat.

PTMP USES WITH NO BUILDING 104 ADDITION This alternative would result in the same impacts to biological resources as the proposed action.

WATER RESOURCES

SUMMARY OF PTMP EIS IMPACT ANALYSIS:

WATER QUALITY Water quality issues within the Presidio are discussed on page 121 of the PTMP EIS. The Presidio has implemented and is operating under the 1994 Presidio of San Francisco Stormwater Management Plan (SMP) prepared by Dames & Moore, which includes a detailed Storm Water Pollution Prevention Plan that outlines erosion prevention and sedimentation control measures used by the Presidio to avoid contamination of storm drains and surface water resources. The SMP is being updated to reflect changes in storm water routing as well as new Phase II stormwater permitting requirements. Water quality is also addressed for specific water

¹⁰Cliff Swallows are protected under the Migratory Bird Treaty Act (16 U.S.C. 703-712).

¹¹This will help to ensure that no nesting activity begins in the intervening period between a survey and the actual work.

resources, including Crissy Marsh (Area A). Stormwater runoff from impervious areas within the Main Post is treated with a series of oil and water separators before discharge into Crissy Marsh.

The impacts of new construction on the Presidio's water resources are analyzed on pages 245 and 246 of the PTMP EIS. The analysis notes that building construction could result in indirect downstream impacts due to erosion, sedimentation, and discharges of other pollutants. As required by Mitigation Measure NR-15 *Best Management Practices* and NR-19 *Future Design*, structural and operational BMPs would be developed and employed to reduce stormwater runoff volumes and protect water quality.

STORM DRAINAGE The impact due to stormwater runoff within the Main Post district was assessed on pages 335 through 341 in the PTMP EIS. The assessment estimated the amount of net new construction (i.e. new construction less demolition) in the district to determine changes in permeable surfaces and thus stormwater runoff. The analysis determined that no additional demands or impacts on the district's stormwater systems are anticipated. The analysis notes that the stormwater systems are designed for a 50-year event, and can therefore accommodate additional flows. Mitigation Measure UT-7 *Stormwater Reduction* would require that infrastructure improvements be installed prior to new construction to minimize stormwater runoff and comply with existing water quality standards, regulatory requirements, and the Trust's stormwater quality control (pollution prevention) program.

SITE-SPECIFIC IMPACT ANALYSIS OF PROPOSED ACTION AND ALTERNATIVES:

PROPOSED ACTION *The proposed action would not substantially inhibit surface water drainage, alter the landscape topography (i.e., involve a major change in grade), lead to increased runoff or erosion, or degrade surface or ground water quality.* However, the new courtyard addition and reconfiguration of the parking zone (Taylor Street side) to accommodate service access, loading and group drop-off would increase impervious surfaces within the project site by roughly 3,523 square feet (from 66,157 sf to 69,680 sf).¹² A stormwater management plan would be developed during project design to reduce impervious cover, promote infiltration, and capture and treat stormwater using structural and operational best management practices (BMPs). BMPs would be designed in accordance with the Trust's stormwater pollution prevention program. Potential technologies and strategies under consideration include use of alternative surfaces (e.g., pervious pavement or grid pavers) and nonstructural techniques (e.g., vegetated swales and filters) to reduce imperviousness and promote infiltration thereby reducing pollutant loadings. All discharges to the storm drainage system would be oil/water separated.

Geothermal systems are being explored to regulate the use of heating and cooling resources. The closed loop, ground water system would consist of a large network of vertical bore holes under the footprint of the proposed parking area that would provide a heat source and sink for the buildings' heating and cooling needs. The type of system that is being considered features continuous piping systems which prevent the circulating fluid from coming in contact with aquifers or geologic formations. The fluid would be repeatedly re-circulated.¹³

¹²Cf., Disney Museum at Presidio. N2 Submittal – 5 July 2006 prepared by Nolte Associates, Inc.

¹³The fluid is commonly water, but may be some other approved fluid.

Compliance with requirements prescribed in California Department of Water Resources standards,¹⁴ including use of best available technology (BAT) or state-of-the-art technology, would provide a suitable level of protection for groundwater resources.

NO ACTION This alternative would not impact the amount of impervious surfaces or stormwater runoff at the Main Post.

PTMP USES WITH NO BUILDING 104 ADDITION Under this alternative, the change in the amount of impervious surfaces and stormwater runoff would be limited to circulation improvements. Similar to the proposed action, BMPs would be incorporated into the alternative's stormwater management plan to manage stormwater runoff thereby limiting disruption and pollution of natural water flows.

HAZARDOUS MATERIALS

SUMMARY OF PTMP EIS IMPACT ANALYSIS:

The PTMP EIS does not analyze the cleanup of hazardous substances, pollutants and contaminants at the Presidio. Rather, pages A-6 through A-10 in Volume III, Appendix A of the document provide information regarding the currently known extent of contamination. The assessment and clean-up activities related to hazardous substances, pollutants, and contaminants on the Presidio are being conducted by the Trust with oversight by the California Department of Toxic Substances Control and the Regional Water Quality Control Board. This program involves extensive investigation, analysis, reporting and remedial design and remedial action strategies. The characterization of contaminated sites, exposure pathways and potential health risks associated with reuse and redevelopment at the Presidio are addressed under regulatory controls separate from the NEPA process and the PTMP EIS.

Many of the historic buildings within the Presidio may contain asbestos, lead-based paint (LBP) or other hazardous materials, and soil within the drip-line of the buildings may contain LBP. Such hazardous materials are remediated in accordance with remediation/stabilization and removal plans approved by the Presidio Trust and all applicable federal and state laws and regulations, which require protection of human health and the environment. Implementation of the plans ensures that exposure does not occur during the course of the cleanup activities. Institutional controls would be in place to protect future workers (e.g., notification to maintenance and construction workers). No improvements within areas where contamination exists would take place prior to remediation of those areas. The risk of human exposure following remediation is low and precautionary measures would be implemented. Because remedial actions would be protective of human health and the environment and would expedite and enhance the beneficial reuse of identified contaminated areas, the PTMP EIS concludes that potential impacts to human health, safety and the environment following cleanup would not be significant.

¹⁴California Well Standards, Bulletin 74-99.

SITE-SPECIFIC IMPACT ANALYSIS OF PROPOSED ACTION AND ALTERNATIVES:

PROPOSED ACTION *The proposed action would not pose a substantial present or potential hazard to human health or the environment.* The proposed action could involve handling and/or storage of hazardous substances, as the buildings may contain asbestos, LBP or other hazardous materials. Prior to construction, the tenant's subcontractor would be required to address such hazardous materials in accordance with local, state, and federal environmental laws and standards. The tenant would submit an Asbestos Plan and LBP Remediation Plan for review and approval by the Trust to ensure that environmental impacts associated with lead and asbestos remediation work are avoided or minimized.

NO ACTION Under this alternative, hazardous materials abatement would be deferred until such time that an alternative proposal is implemented.

PTMP USES WITH NO BUILDING 104 ADDITION Similar to the proposed action, actions would be taken as part of building rehabilitation to ensure that asbestos is appropriately abated and lead paint is stabilized.

VISITOR EXPERIENCE

SUMMARY OF PTMP EIS IMPACT ANALYSIS:

The potential impacts from expanded programs and interpretive and educational opportunities within the Main Post district on the experience of park visitors¹⁵ are analyzed on pages 292 through 296 of the PTMP EIS. The analysis assumes that facilities for the visiting public would be concentrated in the Main Post and Crissy Field districts, including small and large visitor amenities within Main Post buildings. These cultural facilities would attract more recreational visitors annually to the park. Peak visitor use would occur primarily on weekend days and holidays with good weather. Mitigation measures identified in the PTMP EIS would ensure that visitation levels would not exceed desired conditions, and that unacceptable impacts to park resources and visitor experiences would not occur. These measures include limitations of visitor opportunities (Mitigation Measure CO-4), prohibitions on visitor uses (Mitigation Measure CO-5), management controls (Mitigation Measure CO-6), and monitoring of visitor levels (Mitigation Measure CO-8).

SITE-SPECIFIC IMPACT ANALYSIS OF PROPOSED ACTION AND ALTERNATIVES:

PROPOSED ACTION *The proposed action is not expected to adversely impact current or planned visitor services or recreation facilities,* due in large part to the Main Post's existing built environment, as well as current visitor use patterns and ease of public access. Visitor activities would include events, seminars, exhibits, animations, films and building tours. The museum would be open to the public from 10 AM to 6 PM each day of the week, except Thursdays when the museum would close at 9 PM. School group visitations would be from 9:30 AM to 11:30 PM on weekdays, with most school groups departing by 1:00 PM or 1:30 PM. The museum is expected to attract approximately 385,000 to 400,000 visitors annually, including 13,000 to 15,000 school children arriving by bus. The museum would have approximately 1,275 visitors each weekday. Weekends would be more heavily attended than weekdays, with approximately 1,700 to 1,900 people visiting

¹⁵Impacts on visitor experience include visitor orientation, interpretation, public access, park tenants, events and cultural programs.

on a Saturday or Sunday, averaging 220 to 250 per hour and peaking at 300 between 1 PM and 3 PM. Should museum activities unreasonably interfere with other Main Post activities, the WDFW would limit attendance by reducing the days the museum is open or by allowing attendance on a reservation-only basis.

The portion of the informal parking lot immediately in the rear of Building 104 would be improved as part of the proposed action, and sidewalks would be provided between the parking area and the existing sidewalks at the front entrance of Building 104. New sidewalks would also be added to improve pedestrian access to Building 122.

Near the entrance of each building, story board panels and approximately three to four historic photographs presenting and interpreting the historical significance of the buildings would be installed. In addition, the museum's small presentation theater and the multi-purpose area of Building 122 would be made available for lectures and presentations on subjects relating to the history and natural resources of the project area. The WDFW would participate in Presidio interpretation programs for the benefit of the public, whether in concert with the NPS or otherwise. Such interpretive programs could include tours of the Presidio, exhibitions, and other programs under development to facilitate public understanding of the history, development and current use of the Presidio. The public would have access to the landscaped areas, plazas and courtyards adjacent to the museum.

NO ACTION This alternative would not contribute to visitor serving uses within the Main Post.

PTMP USES WITH NO BUILDING 104 ADDITION Under this alternative, programs within the cultural and educational facilities would complement those already in place or proposed at the Main Post.

PARKING

SUMMARY OF PTMP EIS IMPACT ANALYSIS:

Information on current parking supply and utilization of parking facilities within the Main Post is provided on page 182 of the PTMP EIS. The PTMP EIS indicates that there are a total of approximately 2,270 parking spaces within the Main Post, with few of those spaces currently occupied during midday.

An analysis of parking demand and supply for the Main Post under the PTMP is provided on pages 314 through 315 of the PTMP EIS. The PTMP would generate a demand for about 2,015 parking spaces, and would provide approximately 2,116 spaces. The result would be a surplus of 101 spaces, or 5 percent more than the estimated parking demand. The PTMP EIS indicates that different land uses experience peak parking demand at different times of the day. Thus, parking demand is based on the highest value of average weekday midday demand, average evening demand and average weekend demand in each planning area. The parking demand estimates and supply account for shared use of parking.

As required by Mitigation Measure TR-22 *TDM Program Monitoring*, the Trust would implement a Transportation Demand Management (TDM) Program within the district to reduce automobile usage by all tenants, occupants and visitors. The Trust would monitor implementation and effectiveness of the TDM program on an ongoing basis. If TDM goals are not being reached, the Trust would implement more aggressive

strategies or intensify components of the existing program, such as requiring tenant participation in more TDM program elements, and more frequent and/or extensive shuttle service.

SITE-SPECIFIC IMPACT ANALYSIS OF PROPOSED ACTION AND ALTERNATIVES:

PROPOSED ACTION *The proposed action would not greatly increase the demand for parking.* One-hundred thirty-four weekday and 208 weekend non-exclusive parking spaces would be allocated to the proposed action through the lease, and would adequately accommodate the estimated parking demand of 88 to 198 spaces. The proposed action would generate a parking demand of 128 spaces midday on weekdays, 88 spaces on Thursday evenings (0 all other evenings), and 198 spaces on the weekend.¹⁶

During all three periods, the estimated parking demand associated with the proposed action would be greater than the estimated spaces that would be needed for the uses assumed for these buildings for the purposes of the PTMP EIS. In the midday weekday period, the project demand would exceed PTMP EIS parking demand by about 9 spaces during the hours of peak visitation (1 to 3 PM). On Thursday evenings (the only evening the museum would be open), the parking demand for the proposed action would exceed that assumed within the PTMP by 43 spaces. On all other evenings, the parking demand for the proposed action would be about 45 spaces less than anticipated in the PTMP. On weekends, parking demand for the proposed action is expected to exceed that associated with PTMP uses by 138 spaces. However, based on the parking demand of 2,015, 782 and 977 spaces identified for the Main Post in the midday weekday, evening and weekend periods respectively, the planned future district parking supply of 2,116 spaces would provide ample available parking on evenings and weekends. Therefore the increase in both Thursday evening and weekend demand would be accommodated with the proposed parking supply of 2,116 spaces identified in the PTMP EIS. The increase in expected midday weekday parking demand compared to the PTMP EIS assumptions is minimal, and could be accommodated by the modest parking supply “buffer” (approximately 100 spaces, or five percent of the PTMP-estimated midday weekday demand) planned for the Main Post district.

In the future, the museum would be required to participate in a Main Post parking management program that may, among other policies, charge parking fees.

NO ACTION This alternative would not impact parking supplies or the demand for parking.

PTMP USES WITH NO BUILDING 104 ADDITION Under this alternative, parking would be designed to accommodate demand and would be sufficient to meet the museum’s needs.

TRAFFIC

SUMMARY OF PTMP EIS IMPACT ANALYSIS:

ROADWAY NETWORK The potential impacts of development within the Main Post district on future traffic conditions on Presidio and city roadways were analyzed on pages 302 through 320 of the PTMP EIS. Proposed development under the PTMP is estimated to generate 44,407 daily vehicle trips. The PTMP EIS

¹⁶Cf., Disney Family Museum and Library Project Parking Study prepared by Nelson Nygaard Consulting Associates, July 2006.

concludes that following mitigation, local intersections would operate at acceptable levels except for three intersections,¹⁷ which would operate at LOS E and F, primarily due to overall regional traffic growth. Strategies for reducing single-occupancy vehicle trips identified in Mitigation Measure TR-22 *TDM Program Monitoring* would reduce vehicular delays at local intersections.

CONSTRUCTION TRAFFIC The short-term impact of construction traffic on the roadway network due to construction activities within the Main Post district and elsewhere within the Presidio is discussed on page 321 of the PTMP EIS. Construction vehicles would include trucks hauling construction debris and delivering construction materials and supplies, as well as construction worker vehicles. The volume of construction vehicles accessing the district would vary, depending on the specific construction activity and the schedules of the various building elements of individual projects. Construction-related traffic could create some conflicts with local and regional traffic, especially from the larger construction vehicles. However, because construction vehicle trips traveling to and from the district would be dispersed, the vehicle trips on other regional roadways would not be substantial and would generally fall within the normal fluctuations of traffic. As required by Mitigation Measure TR-26 *Construction Traffic Management Plan*, a traffic management plan would be developed prior to construction to provide specific routes and other measures to minimize potential traffic impacts.

SITE-SPECIFIC IMPACT ANALYSIS OF PROPOSED ACTION AND ALTERNATIVES:

PROPOSED ACTION *The proposed action would not substantially increase traffic congestion, traffic volume, or adversely affect traffic safety for vehicles, pedestrians and bicyclists.* The museum would generate vehicular traffic that would travel through several key intersections in the Main Post and the Presidio gates. The PTMP EIS assumed the Montgomery Street barracks would include office and cultural/educational uses. Approximately 113,000 square feet of new construction was also assumed for this area of the Main Post, comprised of residential, office and cultural/educational space. Based on existing square footage, Buildings 104 and 122's share of this new construction includes about 8,200 sf of cultural/educational space, 2,100 sf of office space and eight residential units. The amount of traffic expected to be generated by the proposed action was compared to the amount of traffic that would be generated by these buildings and their share of the district's new construction as proposed in the PTMP EIS. The proposed action (including new construction) was estimated to generate 938 weekday daily vehicle trips, 9 vehicle trips in the AM peak hour, and 33 vehicle trips in the PM peak hour.

Traffic impacts are generally assessed for the times of day when the volume of traffic on the affected roadway system is greatest – the AM and PM peak commute hours. The proposed operating hours of the museum (10 AM to 6 PM) would result in minimal traffic being generated during the AM peak commute hour, and therefore, the more critical comparison to PTMP-estimated traffic demand is based on the PM peak commute hour. While the uses assumed for Buildings 104 and 122 and the prorated share of new construction in the PTMP EIS were estimated to generate 73 PM peak hour vehicle trips, the proposed action would generate an

¹⁷The intersections of Park Presidio Boulevard/Lake Street, Park Presidio Boulevard/California Street and Lincoln Boulevard/Bowley Street/Pershing Drive.

estimated 33 PM peak hour vehicle trips.¹⁸ Therefore, the proposed action would generate less vehicular traffic than land uses assumed for one of the Montgomery Street barracks and Building 122 and their share of new construction in the PTMP EIS. Given that less vehicular traffic would be generated during the peak commute hour, the proposed action would result in a decrease in the overall peak hour traffic volumes expected to be generated by the Main Post as a whole in the PTMP EIS.

The Wdff would be required to participate in the Presidio-wide TDM program and submit a TDM plan, which must detail how its employees would be encouraged to use alternative transportation.

NO ACTION This alternative would not contribute to traffic volumes through key intersections in the Main Post and at the Presidio gates. Therefore, there would no effect on traffic congestion or traffic safety for vehicles, pedestrians and bicyclists.

PTMP USES WITH NO BUILDING 104 ADDITION Depending upon the nature of programs at the museum, it is likely that this alternative would generate about the same or slightly less vehicular traffic at key intersections in the Main Post and the Presidio gates than the proposed action and the 44,760 square feet of the land uses assumed for the Montgomery Street barracks in the PTMP EIS. The effect on traffic congestion or traffic safety for vehicles, pedestrians and bicyclists would be similar to the proposed action.

AIR QUALITY

SUMMARY OF PTMP EIS IMPACT ANALYSIS:

The air quality impacts of development within the Main Post district are analyzed on pages 252 through 260 in the PTMP EIS pursuant to Bay Area Air Quality Management District¹⁹ (BAAQMD) guidelines. The analysis concludes that:

- 1 demolition and construction activities would create fugitive dust particulate matter that could cause adverse effects on local air quality
- 2 projected motor vehicle use would not cause violations of ambient air quality standards for carbon monoxide at congested intersections, and
- 3 housing and employment growth could induce emissions from transportation and energy demand that would be inconsistent with the assumptions in the 2000 Clean Air Plan (CAP)²⁰

Feasible BAAQMD-recommended control measures for fugitive dust particulate matter (PM₁₀) would be required by Mitigation Measure NR-20 *Basic Control Measures* to limit adverse effects on air quality during demolition and construction activities. The Trust's TDM program, which consists of activities conducted by the Trust and by the park's tenants, would implement relevant transportation control measures of the CAP to

¹⁸Cf., Disney Family Museum and Library Project Traffic Study prepared by Nelson Nygaard Consulting Associates, July 2006.

¹⁹The BAAQMD is a California state government agency committed to achieving clean air to protect public health. The BAAQMD is responsible for regulating air quality in the nine regions surrounding the San Francisco Bay Area.

²⁰Note: CAP revisions made since preparation of the PTMP EIS incorporate the growth anticipated under the PTMP.

reduce the number and length of vehicle trips, and thus minimize air emissions and maintain consistency with the CAP.²¹

SITE-SPECIFIC IMPACT ANALYSIS OF PROPOSED ACTION AND ALTERNATIVES:

PROPOSED ACTION *The proposed action would not substantially increase vehicle emissions or emissions of other air pollutants, or generate significant nuisance dust or odors.* PM₁₀ emissions would result from a variety of construction activities, including excavation, vehicle travel, and vehicle and equipment exhaust, but would be short-term in duration and localized. Feasible BAAQMD control measures for dust emissions would be implemented to minimize adverse health effects as well as nuisance concerns such as reduced visibility and soiling of exposed surfaces. In addition, construction contractors would implement U.S. Environmental Protection Agency (EPA) recommendations for construction equipment exhaust emissions that were provided during their review of the Trust's Public Health Service Hospital project.²² These measures require that all construction equipment used at the construction site will:

- 1 not idle for more than ten minutes
- 2 not be altered to increase engine horsepower
- 3 include particulate traps, oxidation catalysts and other suitable control devices
- 4 use ultra low sulfur diesel fuel with a sulfur content of 15 parts per million or less or other suitable alternative diesel fuel, unless the fuel cannot be reasonably procured in the geographic area, and
- 5 be tuned to the engine manufacturer's specifications in accordance with a defined maintenance schedule

Motor vehicles use during museum operations would not exceed any BAAQMD thresholds of significance for criteria air pollutants, and TDM measures to reduce passenger vehicle trips and miles traveled would further reduce emissions.

NO ACTION This alternative would have no impact upon air quality.

PTMP USES WITH NO BUILDING 104 ADDITION Similar to the proposed action, this alternative would not cause a significant air quality impact. BAAQMD-recommended PM₁₀ control measures and U.S. EPA recommendations for construction equipment exhaust emissions would be implemented during construction. Emissions during museum operations would fall below significance thresholds.

²¹ As required by Mitigation Measure NR-21 *Transportation Control Measures*.

²² As required by PHS EIS Mitigation Measure NR-X *Construction Equipment Exhaust Measures*.

NOISE

SUMMARY OF PTMP EIS IMPACT ANALYSIS:

The Trust regulates noise using criteria, standards and levels set forth in the San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code) for permissible noises.²³ The noise impacts of development within the Main Post district are analyzed on pages 260 through 262 in the PTMP EIS using compatibility standards established by the City and County of San Francisco (CCSF) and the Federal Highway Administration. To assess effects on local (including CCSF) roadways, peak hour noise levels were estimated for the Presidio gates. The analysis concludes that while traffic volumes near the gates would increase noise above background levels, the increase would not be substantial (i.e., would not exceed applicable noise abatement criteria) and would not warrant mitigation.

The PTMP EIS notes that construction activities would create short-term impacts on the noise environment. This noise could at times be distinctive and disruptive to park users and other people within close proximity of the activity. Mitigation Measure NR-23 *General Construction/Demolition Noise* requires that during construction, contractors and other equipment operators would be need to comply with the San Francisco Noise Ordinance, which requires that each piece of powered equipment, other than impact tools, emit noise levels of not more than 80 A-weighted decibels (dBA) at 100 feet.

SITE-SPECIFIC IMPACT ANALYSIS OF PROPOSED ACTION AND ALTERNATIVES:

PROPOSED ACTION *The proposed action would not perceptibly increase the background noise levels or expose people to loud noise.* Trust-enforced noise standards would be applied to minimize noise disturbance in the vicinity of the project site during the construction process. The museum and traffic generated by the use would not result in unnecessary, excessive, or offensive noise. Typical sound levels produced by museum exhibits are anticipated to be 70 to 75 dBA, and a variety of strategies would be used to reduce environmental noise (i.e., from Doyle Drive) and exhibit audio.²⁴

NO ACTION This alternative would not create any noise.

PTMP USES WITH NO BUILDING 104 ADDITION Similar to the proposed action, this alternative would attenuate noise during construction to minimize disturbance in the vicinity of the project site. The museum and traffic generated by the use would not emit noise in excess of permissible levels.

ENERGY, WATER AND SOLID WASTE

SUMMARY OF PTMP EIS IMPACT ANALYSIS:

ENERGY The potential impacts of development within the Main Post district on electrical use were analyzed on pages 344 through 347 of the PTMP EIS. The square footage for proposed land uses within the district

²³The San Francisco Noise Ordinance can be viewed at <http://www.municode.com/Resources/gateway.asp?pid=14140&sid=5>.

²⁴Cf., Acoustical Consulting for the Disney Museum – SF Presidio prepared by Charles M. Salter Associates, Inc., dated June 29, 2006.

(provided in Table 39 on page 271) was used to project the electrical use and demand. The PTMP EIS assumes that tenants seeking electrical service upgrades for safety and efficiency (including repair and rehabilitation of old cables, and where possible, undergrounding of overhead lines) would work directly with the Trust or PG&E.²⁵ Mitigation Measure UT-11 *Energy Conservation* would require tenants to employ energy conservation practices to assist the Trust in meeting the goals of Executive Order 13123 and to minimize the environmental impacts of energy consumption:

WATER The potential impacts of development within the Main Post district on water demand were analyzed on pages 328 through 333 of the PTMP EIS. The Trust operates a facility that treats water from Lobos Creek to provide potable water to the park. Supplemental water is purchased from the CCSF as needed. Proposed uses within the district under the PTMP (Table 39, page 271) are taken into account in the Presidio's water demand calculations.²⁶ Mitigation Measure UT-1 *Demand Management* would require tenants to implement Best Management Practices to encourage water conservation.

SOLID WASTE The impacts of demolition and replacement construction within the Main Post and other districts on the regional waste stream are analyzed on pages 341 through 344 of the PTMP EIS. Solid waste would be reduced through efficient resource use, recycling and reuse, by diverting organic material from waste, and by purchasing products composed of recycled materials as required by Mitigation Measure UT-8 Waste Diversion. Asphalt and concrete would be recycled and used for paving where practical. Recycling bins would be available at all activity sites, and tenants would be encouraged to set aside indoor recycling areas. Waste recycling would include developing and implementing a construction and demolition debris management plan with the aim to divert up to 75 to 80 percent of construction waste from landfills.²⁷

SITE-SPECIFIC IMPACT ANALYSIS OF PROPOSED ACTION AND ALTERNATIVES:

PROPOSED ACTION *The proposed action would not substantially increase the amount of energy or water used, or waste generated within the Presidio.* Water-efficient plumbing fixtures and high-efficiency heating and cooling equipment, lights and appliances would be installed during rehabilitation of the building. The building would meet or surpass the energy conservation requirements of the current California Title 24 energy code, where these requirements do not conflict with historic preservation objectives. The WDFF would comply with Trust waste management policies, which require tenants to develop a recycling program in conjunction with their activities at the Presidio, and coordinate their recycling program with the Trust.

Building design would be reviewed under the Presidio Trust Sustainable Design and Building Guidelines, which establish such goals as energy conservation, the use of environmentally responsible materials (such as natural, recycled, salvaged, and durable products or materials made from renewable or biodegradable sources), and water conservation. In selecting materials for rehabilitation, historic features, resource depletion, toxicity, and disposal considerations would be taken into account. The tenant would participate in the Presidio Green

²⁵ While the Trust operates and maintains the electrical distribution system at the Presidio, it is a bundled service customer of PG&E. Therefore, tenants may choose service directly from PG&E.

²⁶ See Appendix H of the PTMP EIS for domestic water demand calculations.

²⁷ As demonstrated by the Letterman Digital Arts project.

Building rating program and report on sustainable practices and products utilized in the building. Finally, the WDFE has expressed an interest in fulfilling LEED (Leadership in Energy and Environmental Design) requirements for the project to demonstrate their commitment to employing state of the art strategies for sustainable site development, water savings, energy efficiency, materials selection and indoor environmental quality.

NO ACTION This alternative would have no impact on energy or water use, or waste generation within the Presidio.

PTMP USES WITH NO BUILDING 104 ADDITION Similar to the proposed action, the principles of sustainable design and technology would be applied during building rehabilitation. Building design would be reviewed by Trust staff for material use, energy and water efficiency, low toxicity and waste reduction.

LIGHT AND GLARE

SUMMARY OF PTMP EIS IMPACT ANALYSIS:

The impacts of introducing new light into the Presidio are analyzed on pages 248 and 249 of the PTMP EIS. The analysis indicated that building rehabilitation and new construction has the potential to increase light or glare in the Presidio, which would affect the character of the Presidio and day and nighttime views. To prevent the loss of dark conditions and of natural night skies, the Trust would seek the cooperation of tenants to prevent or minimize the intrusion of artificial light. The Trust restricts the use of artificial lighting to those areas where security, basic human safety, and specific cultural resource requirements must be met. Where artificial lighting is required, minimal impact lighting techniques and shielding of artificial lighting would be used where necessary to prevent the disruption of the night sky, physiological processes of living organisms, and similar natural processes (Mitigation Measure NR-7 *Artificial Light*).

SITE-SPECIFIC IMPACT ANALYSIS OF PROPOSED ACTION AND ALTERNATIVES:

PROPOSED ACTION *The proposed action would not perceptively increase light or glare.* Additional code-required lights would be installed for visual needs and public safety; however these lights would be high efficiency, low glare, down-cast fixtures per the current California Title 24 code and LEED V2.2 guidelines for new lighting.²⁸ The exterior lighting design would be reviewed by Trust staff to ensure that the new lighting saves energy, minimizes light trespass from the building and site, reduces sky glow to increase night sky access, improves nighttime visibility through glare reduction, reduces the proposed action's impact on nocturnal environments, and eventually fits into a cohesive design scheme for the Main Post.

NO ACTION This alternative would not impact natural darkness as the building would remain unlighted.

PTMP USES WITH NO BUILDING 104 ADDITION Similar to the proposed action, this alternative would maintain safe light levels while avoiding off-site lighting and night sky pollution.

²⁸Cf., Architectural Lighting Design for the Walt Disney Family Museum prepared by Auerbach Glasow, dated July 5, 2006.

VISUAL RESOURCES

SUMMARY OF PTMP EIS IMPACT ANALYSIS:

Visual resources within the Main Post district are discussed on page 68 of the PTMP and pages 122 and 123 of the PTMP EIS. The landscape and buildings of the Main Post reflect roughly 225 years of human history. The forest on the steeply sloping southern hillsides provides a dramatic backdrop to the post and striking contrasts to the formal Main parade grounds. The open bluff along the Main Post's northern edge offers spectacular views of San Francisco Bay and the land features beyond.

The potential impacts on visual resources due to new development within the Main Post district are analyzed on pages 248 and 249 of the PTMP EIS. The analysis concludes that new buildings or building additions and site improvements would be necessarily designed and limited such that the visual character of the Main Post would not be substantially altered. New construction would conform to the PTMP Planning Principles and Main Post District Guidelines to help ensure that it would be compatible with adjacent historic buildings in scale, massing and materials. The guidelines for the Main Post district address overall spatial organization and land patterns, buildings and structures, open space, vegetation, views, and circulation and access. Maximum building heights (30 to 45 feet) identified in the guidelines (page 67 of the PTMP) would not exceed that of existing adjacent buildings or key landscape features (such as the bluffs and forests) and would ensure that key views are not blocked.

SITE-SPECIFIC IMPACT ANALYSIS OF PROPOSED ACTION AND ALTERNATIVES:

PROPOSED ACTION *The proposed action would not block an existing view, be visually intrusive or contribute to a degraded visual condition.* Both Taylor Road and Montgomery Street on either side of Building 104 provide views from the Main Post to San Francisco Bay. From the Main parade ground, cameo views of the Golden Gate Bridge are provided between the Montgomery Street barracks.

Views of the bay along the Montgomery Street side of the building would remain unaffected as no new construction would occur on the building's front façade. The view between Buildings 103 and 104 would be maintained through the retention of the existing Cypress tree (see Figure 2). The view across the Taylor Road parking area toward the Golden Gate Bridge would be retained. The low walls and landscaping proposed for the parking area would not interrupt this view. The grove of Cypress trees that is located to the west of the Taylor Road parking area would be properly pruned (see Figure 3). To preserve the view from the rear of the building (i.e., Taylor Road side), the courtyard addition would not extend beyond the walls of the building's "wings" and would be constructed below the eave line of the existing sloped roof (see Figure 4).

In general, building rehabilitation and restoration of landscape features within the site would enhance the existing visual character of the Main Post and would have a positive effect on its visual integrity. Building design detailing and landscaping improvements that would enhance the site's visual qualities would include replacing historic building elements, removal of asphalt and foundation plantings in keeping with the historic character of the building. The landscaped area and reestablished lawn would allow a clear view of the building from the Main parade ground and clear sight lines from the building to distant views.



FIGURE 2: VIEW BETWEEN BUILDINGS 103 AND 104 FROM THE MAIN PARADE GROUND

Source: View by View, Inc., 2006



FIGURE 3: VIEW OF BUILDING 122 FROM TAYLOR STREET

Source: View by View, Inc., 2008



FIGURE 4: VIEW OF BUILDING 104 INFILL ADDITION FROM PARKING LOT

Source: View by View, Inc., 2006

NO ACTION Stabilizing and securing the building as part of mothballing would involve correcting deficiencies to control its deterioration while unoccupied. However, ensuring that the building would be in stable condition for an extended period of time (i.e., until its eventual rehabilitation) may prove difficult, and the site's visual qualities may erode over the long-term.

PTMP USES WITH NO BUILDING 104 ADDITION Building rehabilitation and restoration of landscape features within the site would enhance the existing visual character of the Main Post and would have a positive effect on the building and the district's visual integrity.

GEOLOGIC HAZARDS

SUMMARY OF PTMP EIS IMPACT ANALYSIS:

The impact topic of geology and soils is discussed on page A-5 in Appendix A of the PTMP EIS. Buildings along the western edge of the Main Post straddle a long narrow canyon that contains low-density hydraulic fill that was placed over soft Bay Mud and colluvium (a thick soil). This area has approximately the same geologic subgrade as the nearby Marina District that experienced extensive damage during the Loma Prieta earthquake.²⁹ This geologic subgrade is designated on a Seismic Hazard Zone map³⁰ prepared by the California Geologic Survey as a zone requiring investigation for seismically induced liquefaction³¹ hazards. Future earthquake ground motion is expected to be quite high due to the soft sandy hydraulic fill and the proximity of the San Andreas Fault (about 5.6 miles west). The PTMP EIS concludes that site-specific development projects would require supplemental review to evaluate geologic and seismic hazards.

SITE-SPECIFIC IMPACT ANALYSIS OF PROPOSED ACTION AND ALTERNATIVES:

PROPOSED ACTION *The proposed action would not increase the threat to public health and safety due to seismic hazards.* To respond to the seismic hazard identified in the PTMP EIS, the building would be seismically upgraded to provide a reasonable level of structural safety for occupants and the public. The structural upgrade would meet the nationally accepted model building codes to the maximum extent feasible, including the minimum requirements of the 2003 International Building Code, the 2003 International Existing Building Code, and the 2001 State Historical Building Code (SHBC) (Part 8, Title 24, California Code of Regulations).^{32, 33} The structural conditions of the building would be surveyed by an architect or engineer

²⁹Both are mapped Quaternary artificial fill (Qaf) by the U.S. Geological Survey (USGS) in USGS Professional Paper 782 (Julius Schlocker 1974).

³⁰The CGS's Seismic Hazard Zone Map for the San Francisco North Quadrangle can be viewed at http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_sf.pdf. The Trust uses the seismic hazard zone map in its land use planning and building permit processes, and requires site-specific geotechnical investigations be conducted identifying the hazard and formulating mitigation measures prior to permitting most developments designed for human occupancy within areas prone to liquefaction and earthquake-induced landslides.

³¹Liquefaction occurs when loose, water-saturated sediments lose strength and fail during strong ground shaking. Liquefaction is defined as the transformation of granular material from a solid state into a liquefied state as a consequence of increased pore-water pressure.

³²As defined in Section 8-101.3, the intent of the regulations is to "facilitate the preservation and continuing use of qualified historical buildings or properties while providing reasonable safety for the building occupants and access for persons with disabilities" (http://www.bsc.ca.gov/title_24/documents/Part8/2001_part8.pdf).

knowledgeable in historical structures. The structural survey would document deterioration or signs of distress, and would determine the details of the structural framing and the system for resistance of gravity and lateral loads. Details, reinforcement and anchorage of structural systems and veneers would also be determined and documented. The results of the survey would be utilized for designing modifications to the structural system to reach compliance with the SHBC.

NO ACTION This alternative would not threaten public health and safety in the event of an earthquake.

PTMP USES WITH NO BUILDING 104 ADDITION Similar to the proposed action, this alternative would be approved only when the nature and severity of the seismic hazards at the site have been evaluated in a structural survey and appropriate mitigation measures have been proposed. Identifying and mitigating seismic hazards during structural design would reduce the threat to public safety and minimize the loss of life and property.

FIRE HAZARDS AND CRIME PREVENTION

SUMMARY OF PTMP EIS IMPACT ANALYSIS:

The potential impacts due to the increased demand for law enforcement, fire protection and emergency response services resulting from an increase in resident and employee population in the Presidio is evaluated on pages 298 through 301 of the PTMP EIS. Law enforcement services at the Presidio are provided by the U.S. Park Police San Francisco Field Office (USPP), and fire protection and emergency medical services are provided by the NPS' Presidio Fire Department. Pursuant to an Interagency Agreement, the Trust reimburses the USPP and the NPS for the costs of providing law enforcement and fire prevention and suppression services. The analysis concluded that the increase in employee populations within Main Post and other districts would potentially raise the number of calls for police service, fire protection, and emergency response. The PTMP EIS assumed that the public safety service providers would review a specific proposal against public safety service standards following tenant selection within the district and identify any appropriate increases in staff, equipment, and facilities to maintain adequate services. Costs to provide services would be reimbursed through Service District Charges.³⁴

SITE-SPECIFIC IMPACT ANALYSIS OF PROPOSED ACTION AND ALTERNATIVES:

PROPOSED ACTION *The proposed action would not create or contribute to a fire hazard or increase the demands for fire department or police services.* Installation of fire protection upgrades would maintain a reasonable degree of fire protection based primarily on the life safety of the occupants and firefighting personnel. Prior to building rehabilitation, construction documents and shop drawings would be submitted, reviewed, and approved by the Presidio Fire Department fire inspector as part of a life-safety evaluation.

³³ Provided that where the State Historical Building Code or the International Existing Building Code allows for an exception that is not available under the International Building Code, such exception shall remain available for building activity in Area B so long as the implementation of such exception is not inconsistent with federal law.

³⁴ The Presidio is exempt from state and local property taxes. Presidio Trust tenancies are subject to a service district charge to pay for Presidio-provided services, such as fire protection, police protection, road maintenance, street lighting, off-site landscape maintenance, stormwater drainage, and emergency medical response. This charge is subject to periodic adjustment.

Construction documents would include all fire prevention requirements for the proposed use, including an automatic fire-extinguishing (i.e., sprinkler) system and fire alarm systems. Shop drawings and equipment specifications would be required to comply with the requirements of the National Fire Protection Association (NFPA) Fire Codes and Life Safety Codes and the Presidio Trust Tenants Handbook.³⁵ Preservation of the integrity of the historic building would be effectively integrated with fire management through the use of “minimum impact” techniques. The water supply and delivery system would be designed and maintained to provide sufficient flows to operate fire sprinkler systems and fire hydrants. The Presidio Fire Department fire protection inspectors would issue permits once requested submittals have been reviewed and approved, inspect construction in progress, and provide life safety inspection of subsequent occupancy and public education to reduce fire loss.

The proposed action would not increase demand for police services. Prior to building rehabilitation, construction documents and shop drawings would be submitted to the USPP for security code compliance and installation of adequate security systems.

NO ACTION While securing the building would reduce the risk, it would not protect the building from sudden loss by fire nor prevent vandalism and break-ins while it is unoccupied.

PTMP USES WITH NO BUILDING 104 ADDITION Fire protection and suppression, and crime prevention would be primary considerations in the design and rehabilitation of the building. Fire and crime prevention would occur through code-compliant upgrading of the existing structure.

CONSISTENCY WITH THE PRESIDIO TRUST MANAGEMENT PLAN

PROPOSED ACTION *The use of Buildings 104, 122 and 108 as museum, archive and office space is consistent with the PTMP, which identifies cultural/educational and office uses as preferred land uses at the Main Post (page 64).* The museum’s total square footage devoted to public programming would contribute 27,850 square feet towards the accommodation of cultural and educational uses at the Main Post. This would represent approximately 13 percent of the building space that would ultimately be devoted to cultural use at the Main Post under the PTMP (page 37). The PTMP acknowledges that the precise nature of cultural and educational facilities would depend largely on opportunities offered by tenants and park partners, and by the buildings themselves (page 36). The PTMP allows for the construction of the courtyard addition, since it would encourage reuse of the historic building (page 6) and provide visitor amenities (page 35). The PTMP would require that the courtyard addition be:

- carefully integrated into the Main Post’s landscape (page 63)
- carried out in accordance with the planning guidelines set forth in the PTMP (page 63) and
- configured to be compatible with the NHLD (page 64)

The 16,900 square-foot courtyard addition would represent approximately 15 percent of the permitted maximum new construction of 110,000 square feet under the PTMP.

³⁵Cf., Presidio Fire Department Project Review Comments for Walt Disney Family Museum & Library, dated July 5, 2006.

NO ACTION This alternative would not contribute to the PTMP's goal to enliven the Main Post as a visitor and community center. As timely building rehabilitation would not occur, this alternative would also be inconsistent with PTMP historic preservation objectives. In addition, this alternative would be inconsistent with the PTMP financing strategy to generate revenues as a result of leasing to ensure the Trust's long-term financial viability and accomplish other plan objectives.

PTMP USES WITH NO BUILDING 104 ADDITION Rehabilitating the historic buildings for museum, archive and office space would be consistent with PTMP historic preservation objectives, planned building square footage, and preferred uses for the Main Post. As noted by the PTMP, this alternative would be expensive to establish and operate, and would require funding by a sponsoring organization or other outside source.

CUMULATIVE IMPACTS

SUMMARY OF PTMP EIS IMPACT ANALYSIS:

The cumulative impacts³⁶ of development on the Main Post and other districts within the Presidio are analyzed on pages 363 through 375 of the PTMP EIS. Table 60 on page 364 of the PTMP EIS, which provides the context for the discussion, enumerated 21 past, present and reasonably foreseeable actions, including projects by other agencies (NPS, USFWS, Golden Gate Bridge 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 varied for each resource) and investigating their actions in the planning, budgeting, or execution phase. 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 of the 25 resource topics that were analyzed, the analysis in the PTMP 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 due to contributions to regional growth (i.e., not due to localized air quality impacts). Development within the Main Post district would contribute to the referenced cumulative impacts. No mitigation measures for cumulative impacts have been previously identified.

CONTRIBUTION OF PROPOSED ACTION TO CUMULATIVE IMPACTS:

CUMULATIVE ACTIONS AND RESOURCES AFFECTED *Overall, the incremental adverse effects associated with the proposed action are not expected to be significant. In several instances, the incremental contribution of the proposed action to the cumulative effect on the Main Post and Presidio would be neutral or beneficial.* Cumulative effects that have been described within the PTMP Final EIS are summarized below as they would pertain to other relevant cumulative actions that may have impacts in conjunction with the impacts of the proposed action. For the purposes of this discussion, these actions include the following: rehabilitation of

³⁶ "Cumulative impact" is defined in CEQ's NEPA regulations as the "impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions ..." (40 CFR 1508.7).

Buildings 35, 86, 87, 99, 100, 122 and 211; construction of the transit center (Building 215); improvements to the Main parade ground, and potential construction of additional buildings consistent with the PTMP. Specific resources that may be affected by these cumulative actions include the following: cultural resources; visitor experience; visual resources; traffic; and parking.

CULTURAL RESOURCES Potential impacts associated with building rehabilitation and enhancements to the Presidio cultural landscape would be considered beneficial, due to their conformance with the Secretary of the Interior's Standards, as well as the PTMP Planning Principles and Planning District Guidelines. Improvements to the Main parade ground would recognize the historic military order in the landscape, and include opportunities for interpreting the Presidio's history. The proposed action would incorporate existing landmarks and symbols, and would reinforce important historic spatial and visual relationships, including the boundaries of the parade grounds and the relationships between buildings and open spaces. New elements would be compatible with the NHL, and changes would seek to avoid or minimize adverse effects to historic resources.

Cultural resource impacts associated with new construction activities at the Main Post would be considered less than significant, due to the limits set on the level of new construction, the commitment to future planning and environmental analysis for a proposed undertaking, and the requirement for further consultation under Section 106 of the National Historic Preservation Act (NHPA). The compatibly-scaled infill construction would be "selectively placed" and oriented to "reinforce the historic framework and layout of the Main Post."³⁷ In addition, the scale, massing, height, materials and color of infill construction would be compatible with the character of adjacent buildings.

VISITOR EXPERIENCE The rehabilitated buildings would host new park tenants and programs, which would add to the visitor experience offered at the Main Post, which is envisioned as the central arrival area for visitors and as a lively pedestrian district. Improvements to the Main parade ground would provide venues for programs of various types and sizes, and increase opportunities for planned and unplanned gatherings. It would include outdoor space for performances and festivals, as well as for small-scale gatherings and daily activities such as picnicking, staging for tours, and other visitor experiences.

VISUAL RESOURCES Rehabilitation of the historic buildings would create a positive visual change within the Main Post. New construction would be limited, but where allowed, it would be compatible with the visual setting. Restoring the Main parade ground and reinforcing the edges of the historic open space through new design features would complement the rehabilitated historic buildings and improve visual quality by reducing pavement and introducing grass and other compatible materials. Main parade ground improvements would also anticipate opportunities to enhance physical and visual connections to Crissy Field when Doyle Drive is replaced.

TRAFFIC Site improvements would improve circulation, creating distinctions between vehicular and pedestrian routes, and enhance connections to the surrounding buildings, the mass transit center, and the Presidio as a whole. The transit center would provide safe and convenient access to transit and orientation information to visitors, and would include a waiting area and public restrooms. Road and intersection improvements would be

³⁷ PTMP pages 65 and 67.

made to minimize traffic congestion and improve safety. However, residents, visitors, and employees may experience delays and other inconveniences (such as noise) associated with construction activities. Cumulative traffic volumes generated by uses in these buildings would be the same or less than analyzed in the PTMP EIS.

PARKING Sufficient parking would be provided accommodate existing and planned land uses within the Main Post. Nearly all of the existing supply of 2,270 parking spaces would be reorganized within the district to ensure that there is adequate parking to meet tenants' needs. The redesigned or relocated parking areas would also simplify access and reduce their visual impacts. Cumulative parking demand would be accommodated within existing and planned future parking supply.

CONTRIBUTION OF ACTION ALTERNATIVE TO CUMULATIVE IMPACTS:

Overall, the incremental adverse effects associated with the other action alternative (i.e., PTMP Uses with No Building 104 Addition) would be similar to the proposed action and would not be significant. The incremental contribution of the action alternative to the cumulative effect on cultural resources within the Main Post and Presidio would be less than the proposed action, as no infill addition would be constructed. Thus, the character-defining spatial relationship of Building 104 and its setting would not be altered.

4 Agencies and Persons Consulted

The following agencies were consulted during preparation of the EA.

ADVISORY COUNCIL ON HISTORIC PRESERVATION / STATE HISTORIC PRESERVATION OFFICER

As described in the PTMP EIS (page 82), the Trust is required to comply with the NHPA. Section 110 of the NHPA sets out the broad responsibilities of federal agencies to integrate preservation into their ongoing activities, and requires agencies to “minimize harm” to National Historic Landmarks like the Presidio. Section 106 of the NHPA requires federal agencies to take into account the effects of their actions on historic properties, and to seek comments on their actions from an independent federal reviewing agency, the Advisory Council on Historic Preservation (ACHP). The ACHP’s regulations governing consultation under Section 106 further require the agency to consult with the applicable State Historic Preservation Officer (SHPO) and any other organizations or individuals who express an interest in being part of the Section 106 process.

During preparation of the PTMP, the Trust consulted with the ACHP, the California SHPO, and the NPS as well as with the National Trust for Historic Preservation (NTHP), and the Fort Point and Presidio Historical Association (FPPHA) as concurring parties and executed a Programmatic Agreement (PA) regarding the plan and various operation and maintenance activities within Area B. This PA establishes procedures by which the Trust will satisfy its Section 106 responsibilities.³⁸

Consistent with the PA and ACHP regulations that suggest early integration of Section 106 compliance with NEPA and other agency processes, on October 26, 2004, Trust staff and members of the WDFP design team met with SHPO representatives to review the project as proposed to date, and obtain preliminary comments and early input. On November 1, 2004, the Trust formally began the consultation process by submitting a “consultation package” on the project to the ACHP, SHPO and NPS. SHPO reviewed the submitted documentation and offered comments in its letter of December 23, 2004, which included recommendations to bring the proposed project into compliance with the Secretary of the Interior’s Standards.

An onsite consultation meeting was held on March 9, 2005 among the SHPO, NPS, WDFP design team and the Trust. The ACHP did not attend the meeting. SHPO Wayne Donaldson provided substantial comment to help the project meeting the Secretary of the Interior’s Standards. Mr. Donaldson found that the proposed two-story addition to the courtyard of Building 104 would meet the Secretary of the Interior’s Standards if the exterior wall were held behind the west elevation of the historic wings and if the roof were below the eave height of the historic gable roofs. He also gave direction to providing a more transparent structure to be able to “read” the historic walls of the courtyard from outside the new addition.

Another consultation meeting was held on December 13, 2005, in the Sacramento office of the SHPO with the new WDFP design team to introduce a revised proposal for the undertaking and three alternatives for the proposed courtyard addition. Mr. Donaldson repeated his previous finding that the project would meet the Secretary of the Interior’s Standards and suggesting the most transparent alternative as preferable. The

³⁸See Appendix C of the PTMP EIS for the full text of the agreement.

question of whether WDFFF would pursue federal historic preservation tax credits for the undertaking was discussed during the meeting but no decision was reached on this issue.

The scope of the consultation changed on January 4, 2006, when Deputy SHPO Steve Mikesell in a telephone communication with the Trust's Federal Preservation Officer made the determination that review of the undertaking should be through the Trust's PA. Since previous discussion with the SHPO indicated that the undertaking could be completed without adverse effect, Mr. Mikesell found that the scope of review was comprehended in stipulations V through VII of the PA. Therefore, unless the WDFFF pursued federal historic preservation tax incentives, the SHPO's office would not be involved in further review of the undertaking. Mr. Mikesell suggested, however, that it may be prudent for the Trust to invite courtesy review comments from the parties to the PA.

Following Mr. Mikesell's suggestion, a courtesy review package was transmitted to all PA parties on February 16, 2006, and all were invited to attend a review meeting held on March 7, 2006. Since the undertaking would be reviewed through the PA, both the SHPO and the ACHP declined to attend the meeting or comment on the review package. Representatives from the FPPHA and NPS were in attendance at the meeting and later provided comments on the undertaking (see below).

Value engineering and incorporation of all parties comments resulted in significant changes in the scope, scale, and design of the undertaking and on May 12, 2006, consultation continued "in-house" when the WDFFF design team presented a revised undertaking to Trust preservation staff. The determination was made that Trust staff would continue to work with the WDFFF design team to ensure that adverse effect was avoided or minimized in keeping with the requirements of the PA.

On May 19, 2006, the WDFFF submitted a "letter of inquiry" to the SHPO with the intent of obtaining answers to concept questions in the event that they would seek federal historic preservation tax incentives. However, after weighing multiple issues, the WDFFF determined not to seek tax incentives and the letter of inquiry was retracted on July 13, 2006.

The WDFFF design team presented the undertaking to Trust preservation personnel on July 13, 2006, for review through the PA. In attendance at the meeting were representatives of the FPPHA who provided comment on the undertaking on July 15, 2006. All comments pertinent to review through the PA, including those provided by FPPHA, were provided to the WDFFF design team on July 21, 2006. A follow-up meeting was held on July 27, 2006, between the WDFFF design team and Trust historic preservation staff to review Section 106 comments made by all reviewers.

A Certificate of Compliance will be issued at the close of the design development phase of the undertaking. This certificate records that the undertaking complies with the Secretary of the Interior's Standards and concludes the Section 106 consultation under the PA. Trust preservation personnel will continue to work with the WDFFF design team through design development to ensure compliance with the Secretary of the Interior's Standards. No construction work will be initiated on the project until the Certificate of Compliance has been issued. All PA parties including the ACHP and SHPO will be informed of the undertaking in the Annual Historic Preservation Report as required by stipulation XXI of the PA.

NATIONAL PARK SERVICE

As a party to the PA, Craig Kenkel, Chief of Cultural Resources and Museum Management for Golden Gate National Recreation Area, attended the March 7, 2006, courtesy review meeting and provided comment in a letter dated March 17, 2006. His opening paragraph states, "The design concepts presented by Page and Turnbull architects and The Office of Cheryl Barton landscape architects in some ways respectfully responds to the historic built environment and in other ways challenges it." With regard to the proposed new addition on Building 104 he states, "the contemporary design is dynamic and exciting, but, in my opinion, does not fully meet standard nine of The Secretary of the Interior's Standards for Rehabilitation." He found that there would "be an obvious distinction between the new and the old, but compatibility with massing, size, scale, materials, color, and architectural features is very weak."

Mr. Kenkel further commented in the same letter on the historic landscape between Buildings 104 and 122. He stated that the area behind the buildings was historically the "backyards and the alley or service street." He was concerned that proposed new uses were more public and would therefore require "a level of landscape design that is more formal than appropriate." He was further concerned that proposed changes in the landscape in concert with the building addition might result in "Building 104 no longer having a historic rear, architecturally or functionally."

Mr. Kenkel's comments were provided verbatim to the WDFE design team, which has sought to incorporate his concerns into the undertaking. His comments will continue to inform discussions between Trust preservation staff and the WDFE design team as they seek to successfully complete the undertaking at the no adverse effect level.

FORT POINT AND PRESIDIO HISTORICAL ASSOCIATION

As a concurring party to the PA, representatives of the FPPHA have been involved in the consultation process for this undertaking since the NEPA scoping process began. In addition to comments on the scoping process described below, the FPPHA attended consultation meetings held on November 17, 2004 and March 7, 2006. They also attended Trust "in-house" review meetings after the determination that the undertaking would be reviewed through stipulations V through VII of the PA.

In a letter dated March 24, 2006, Gary Widman, President of the FPPHA, stated, "it appears the Disney group has the means and interest to do a good job on this new proposal." He cautions that the "visual aspects of the District would be best protected by avoiding incongruous exterior design and landscape features." He asks that the landscaping surrounding all buildings be made "more restrained, more in an austere military mode." While he believed that interior modifications proposed at Building 104 "appear to be well conceived and consistent with the Secretary's Guidelines," he found that the "infill in the courtyard, which is above the lowest floor level appears intrusive, and needs to be made more sensitive to the historic building." He stated that this latter comment was "the most significant concern arising from the Disney proposal." He provided specific suggestions for improving the courtyard addition.

In a letter dated July 15, 2006, after having viewed a significantly revised undertaking at the July 13, 2006, internal review session, Mr. Widman stated that he was "pleased to learn of the emphasis on preserving the

original fabric of all three of these buildings, and of the move to reduce the visual prominence of the new infill section in Building [104].” However, he expressed a belief that “more might be done to reduce the visual impact of the new structure.” He suggested that the exterior wall of the new addition might be recessed eight feet, rather than four feet, from the outer most edge of the historic courtyard. Mr. Widman further raised questions on how the WDFF design team would:

- 1 provide transparency so that the original building would remain visible from Taylor Street
- 2 provide a useful space that is not dominated (or made unusable) by light, heat and glare from the sun and
- 3 provide an appearance that is not compromised by unplanned or unreviewed draperies or other light control process

Equally important to the FPPHA as appropriate treatment of the historic resource, Mr. Widman requested both at the July 13, 2006, meeting and in the July 15, 2006, letter, that the WDFF provide a “pre-show” area in the front interior of the building that would be devoted to depicting the history of the building and its occupants – particularly their WWI experience. This request was met with positive response from the WDFF design team during the meeting.

Mr. Widman’s comments were provided verbatim to the WDFF design team, which has sought to incorporate the concerns of the FPPHA into the undertaking. Their comments will continue to inform discussions between Trust preservation staff and the WDFF design team as they seek to successfully complete the undertaking at the no adverse effect level.

5 Public Involvement

The following describes the process used to invite the participation of the public prior to preparation of the EA.

SCOPING PROCESS AND ISSUES RAISED DURING SCOPING

The public was notified of the proposed action through a postcard mailing sent to approximately 14,000 individuals on the Trust's mailing list in late October 2004. The postcard announced the proposed action and invited the public to attend an upcoming "open house" meeting and to submit comments regarding the project scope, its potential effects on historic resources, and other environmental issues. The proposed action was also featured in the December 2004 issue of the Presidio Post, the Trust's bi-monthly publication. The open house and public meeting was held at Building 104 on November 17, 2004 and attended by 39 members of the public. By the close of the 60-day public scoping period for the proposed action (November 1, 2004 - December 31, 2004), the Trust received six letters, including three received from historic preservation organizations (the Fort Point and Presidio Historical Association, California Heritage Council, and San Francisco Architectural Heritage) and three from interested individuals. The following is a summary of the comment letters received with responses to the issues raised.

VISION/PLAN FOR MAIN POST DISTRICT:

COMMENT The FPPHA maintained that the Trust does not yet have a plan or a vision for the Main Post, and therefore it is difficult to understand how the project fits into the Main Post.

RESPONSE The Trust has, in fact, already defined for the public a plan and vision for the Main Post. For more than two years, the Trust deferred development projects in order to engage the public in the development of the PTMP, a comprehensive land use plan for Area B of the Presidio. The Trust adopted the PTMP in August 2002 and is now moving forward with site-specific project proposals that have been governed and guided by the plan. The accompanying PTMP EIS evaluated the broad environmental impacts of the program-level plan, and analyzed for each planning district, including the Main Post, the parameters of expected development and open space resource-based actions. The PTMP identified the Main Post as the traditional "heart of the Presidio" to remain the park's vital center and a focal point for visitor orientation. The PTMP envisioned preserving and rehabilitating the Main Post's historic buildings for preferred uses, including cultural/educational uses and offices, and anticipated building additions that would be carefully integrated into the post's landscape and carried out in accordance with planning guidelines provided in the plan (PTMP pages 65 through 69). The proposal is highly consistent with and would contribute to the planning concept set forth in the PTMP for the Main Post district.

PTMP held open the possibility of further, more specific district level planning where appropriate, but did not "commit to" further district level planning. Specifically, the PTMP states:

The nature of this Plan necessitates that more specific planning be undertaken in the future, and that further public input and environmental analysis be completed before many implementation decisions are made. [Footnote 3: Exceptions to this statement will generally

involve... improvements that would clearly not have significant or adverse impacts on park resources and neighboring areas other than described in the EIS that accompanies this Plan.] (PTMP page 128).

The proposed Walt Disney Family Museum is among the exceptions that may not involve extensive additional environmental analysis under NEPA, because the potential impacts of the proposed action have been largely identified and evaluated, and mitigations have already been defined as part of the PTMP EIS, as demonstrated in this EA. The process of reviewing smaller projects within the context of a larger development plan (“tiering”) is expressly contemplated under NEPA and is a proper method of reviewing impacts over time, from various projects, for a large, complex site such as the Presidio. The nature of tiering allows the programmatic document to review impacts over a large area, and the site-specific document to evaluate projects within the area (while still including the necessary analyses of cumulative and indirect impacts).

WALT DISNEY FAMILY FOUNDATION MISSION:

COMMENT Mike Mooney was “strongly against” the proposal to allow Disney to operate and occupy any facility or building at the Presidio, and said its mission is inconsistent with the National Park Systems’ mission. “Disney has a record of trying to commercialize public lands, such as Mountain King in the southern Sierra. Disney is also a member of an outdoor recreation organization that tries to find ways to open parks and forests up to destructive and inappropriate park uses, such as motorized off-road vehicles and trying to install theme parks within National Parks.” Michael Shough sought reassurance that “there will not be Disney characters cavorting around the Main Parade.”

RESPONSE The Walt Disney Family Foundation, a non-profit organization operated by descendants of Walt Disney, strives to promote and produce serious discussion, writing, and scholarship about the life, work, and philosophy of Walt Disney. The WDFF’s mission is:

To gather, manage and preserve archival material, and to use that material to study, teach, publish and prepare exhibits appropriate to communicate the vision and legacy of Walt Disney within a historical context. The focus is to be on Walt Disney as an artist, entrepreneur, visionary, philanthropist and world-renowned creative genius, and all activities are to employ academically rigorous standards. Research material will be made available in the form of books, exhibits, periodicals, teaching materials, an Internet website and other appropriate printed and/or electronic media that may exist from time to time.¹

Neither the WDFF nor its directors are affiliated with the Walt Disney Company, a major entertainment corporation, or its affiliates, and the organization does not receive monetary contributions or compensation from the Walt Disney Company or its affiliates.

¹ For more information, view the WDFF website at <http://www.waltdisney.com>.

PRECEDENT SETTING NATURE OF PROPOSAL:

COMMENT The California Heritage Council expressed concern about the proposal and suggested that the Trust lacks a vision for the Main Post. They asked whether approval of the project would set a precedent, so that any “family or corporation wishing to honor an entrepreneur or otherwise eminent forebear, hobby or collection, would be allowed to build a privately funded museum...”

RESPONSE Planning concepts and planning guidelines for the Main Post, including its character, land use preferences, open space, accessibility and circulation are provided on pages 62 through 69 of the PTMP. The planning guidelines identify key character-defining features of the district and establish guidelines for future changes, including potential new construction, to ensure compatibility with the NHLD. The planning guidelines also address overall spatial organization and land patterns, buildings and structures, open space, vegetation, views, circulation and access.

The Trust’s tenant selection criteria are provided on pages 134 and 135 of the PTMP. Preferred tenants will serve the public interest, and will meet all the Trust’s selection criteria. The Trust considers tenants who bring value to the park by their ability to rehabilitate a building and to contribute to the vitality of the community. In seeking building tenants, the Trust is committed to using innovative approaches to attract a wide range of tenants and achieve a diverse tenant mix. For these reasons, the proposed action cannot be considered precedent setting.

BUILDING DESIGN FROM TAYLOR ROAD:

COMMENT The FPPHA and the California Heritage Council underscored the importance of maintaining the structural and aesthetic integrity of the building from the Taylor Road perspective as well as from the Main parade ground. They insisted that the integrity of the full row of Montgomery Street barracks should be preserved, as it represents an architectural rhythm unique to the Presidio as noted by Trust staff. The FPPHA stated that the new infill addition should be confined to within the existing building’s envelope.

RESPONSE The new wall of the infill addition would be constructed at a location behind the Taylor Street elevations of the barracks wings. Through the use of this setback and incorporation of articulated massing and appropriate materials, the rhythm of the “open to void” spaces of the barracks would be preserved.

SPECIFIC BUILDING TREATMENTS:

COMMENT The San Francisco Architectural Heritage expressed “high hopes for the positive impact this project could have on both the Presidio and San Francisco” and asked specific questions regarding how the new construction and reuse would impact the historic building. The questions raised concerns regarding:

- 1 the impact of the new addition on the dormers along the original roof
- 2 planned treatment of existing windows
- 3 the potential to retain the exterior brick walls of the affected portion of the historic building and serve as interior walls to the addition and
- 4 alterations or reinforcement of the front porch to accommodate the increased foot traffic.

RESPONSE The roof of the new addition would be lower than the eaves of the surrounding historic roofs. While one dormer would be impacted to create an elevator entrance at the third storey level, the remaining dormers would not be impacted and would be visible above the roof of the new addition. Existing windows would be retained and rehabilitated. In some locations, incompatible windows were installed at some previous time into historic openings. These incompatible windows would be replaced with new windows matching the historic configuration. “Black out” conditions for interpretation purposes are being limited to the wings of the barracks building. In these locations, the historic window would remain in place and an operable panel will be placed behind the window to block out exterior light. The operable panel would allow cleaning and maintenance of the historic windows. The exterior brick walls of the courtyard would remain fully visible as part of the new addition. Proposed skylights and interior lighting would allow the walls to be visible from both the interior and exterior of the building. Structural testing and analysis of the building would ensure adequate strength in the porch floors to accommodate the increased foot traffic.

REVERSIBILITY OF BUILDING ADDITION:

COMMENT Matthew Waldman “welcomed” the proposal, suggesting that the building is better suited as a museum than “a warehouse behind Gorgas Avenue.” Mr. Waldman hoped that alterations to the historic structure to enclose the courtyard for use would be easily reversible to return the building to its current design should the WDFE leave in the future. The California Heritage Council felt that if the proposed freight elevator and staff elevator were not readily removable, the Secretary of the Interior’s Standards would be potentially violated.

RESPONSE The new addition is being designed to have the minimum attachment and penetration necessary to ensure structural stability. The new structural system will be designed to have maximum support with a minimum number of beams. Should the addition be removed at a future date, attachment locations can be readily repaired. The elevators will be located in the historic stair towers of the courtyard. The stairs were removed from these towers by the U.S. Army in the 1980s. The southern tower will remain intact although extended in height to accommodate a third floor landing. The northern tower will require removal of one wall to accommodate an elevator of larger “footprint” than the size of the tower. While not readily removable, the proposed elevator installations meet the Secretary of the Interior’s Standards.

INTERPRETIVE DISPLAYS OF BUILDING’S HISTORY:

COMMENT The FPPHA and the California Heritage Council urged the Trust to require the tenant to display historic information about the buildings, their architectural context and their era, to the public without admission charge.

RESPONSE The WDFE would install a “pre-show” of building lobby panels and historic photographs presenting and interpreting the historical significance of the buildings and the people who used them within the reception area and other suitable locations.

PARKING:

COMMENT Matthew Waldman suggested that alterations to the Main parade ground in front of the building were “misguided” because the “future museum and the future users of the other currently empty buildings on Montgomery Street will greatly appreciate the enormous expanse of nearby easily accessible parking in a park that is generally plagued with parking problems.” The FPPHA wanted assurance that there would be ample convenient parking for the future NPS Visitors’ Center and Museum in Building 102. “Requiring Presidio visitors to walk as far as the length of five football fields from their cars to the Visitors’ Center and Museum or to any of the other Montgomery Street barracks buildings... constitutes an unreasonable and wholly unnecessary limitation on access to the public facilities in those buildings.”

RESPONSE Restoration of the Main parade ground would relocate the existing parking spaces to other locations on the Main Post to provide a total parking supply that is approximately five percent greater than the average parking demand in the peak period (e.g., midday weekday, evenings or weekends). This approach is consistent with the PTMP EIS, which included provision of 2,116 parking spaces (compared to the current 2,270 spaces) at the Main Post to serve the estimated future midday weekday parking demand of 2,015 spaces.

The relocation of the approximate 740 parking spaces at the Main parade ground would be facilitated through improving the efficiency of existing parking lots and geographically locating new parking lots to best meet parking demand in particular parts of the Main Post. The most convenient spaces would be used as efficiently as possible, and therefore on-street spaces immediately adjacent to buildings would likely have time restrictions to allow for use by visitors rather than employees. In the interest of environmental sustainability, the Presidio’s parking management program, as an element of the Trust’s TDM program, is intended to provide incentives for the use of modes other than single occupant vehicles. As an urban national park, the Trust’s goals are to make the Presidio accessible to persons traveling by transit, bicycle and walking as well as by automobile, and to use park land to benefit and serve the greatest number of people to the greatest extent possible. Transportation planners typically assume 1,200 to 1,500 feet (approximately five- to six-minute walk time) to be a reasonable walking distance for accessing transit. The redistribution of parking throughout the Main Post would provide parking supply within this distance or less for all buildings on the Main Post.

Finding of No Significant Impact

This finding of no significant impact (FONSI) provides the basis for the Presidio Trust's (Trust) determination that proposed modifications to Buildings 104, 122 and 108 for the proposed Walt Disney Family Museum, as analyzed in the attached environmental assessment (EA), will 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 action and its environmental consequences are contained in the EA, which is incorporated by reference into this FONSI.

PROPOSED ACTION

Buildings 104, 122 and 108 are structures located on the grounds of the Presidio of San Francisco and contained within the boundaries of the Golden Gate National Recreation Area in the City and County of San Francisco. Buildings 104 and 122, constructed near the turn of the last century as barracks and a gymnasium, respectively, and Building 108, erected for storage and an electric shop in 1940, are contributing structures to the Presidio of San Francisco Historic District, a property listed on the National Register of Historic Places. The proposed action will adaptively reuse Buildings 104, 122 and 108 as a museum, archive and office space by the Walt Disney Family Foundation (WDFW or tenant). The proposed action includes the construction of a rear addition to Building 104 to facilitate visitor circulation and museum programs. The new construction will infill an existing open courtyard formed within the "U" shape of the building.

BASIS FOR DECISION

Based upon the EA, the Trust determines that the proposed action will not have direct, indirect or cumulative significant impacts on the human environment. The analysis supporting this conclusion is presented in Section 3 (Environmental Impact of the Proposed Action and Alternatives) of the EA. The following summarizes factors considered in this determination.

CULTURAL RESOURCES:

The proposed action will not have an adverse effect on the historic buildings or the historic district or the setting. Building rehabilitation will be consistent with the Secretary of the Interior's Standards for Rehabilitation (Standards). Section 106 consultation and review of rehabilitation plans for compliance with the Secretary of the Interior's Standards will be accomplished pursuant to stipulations V through VII of the Trust's executed Programmatic Agreement and 36 CFR 800. Identified measures to address minimize or avoid adverse effects will be included in the schematic design documents and committed to as part of the project implementation. The Section 106 consultation will be concluded with the issuance of a Certificate of Compliance at the end of design development. Construction work on the undertaking will not commence until the Certificate of Compliance has been issued.

BIOLOGICAL RESOURCES:

The proposed action will not substantially alter native plant community or wildlife habitat.

WATER RESOURCES:

The proposed action will not substantially inhibit surface water drainage, alter the landscape topography (i.e., involve a change in grade), lead to increased runoff or erosion, or degrade surface or ground water quality. Structural and operational best management practices (BMPs) will be incorporated into the project design during construction and operation to control runoff, minimize discharge to the storm sewer system, protect ground water, and increase onsite water infiltration to the maximum extent practical.

HAZARDOUS MATERIALS:

The proposed action will minimize the present and future threat to human health and the environment. Any hazardous materials contained in the buildings and on the project site will be abated in accordance with local, state, and federal environmental laws and standards.

VISITOR EXPERIENCE:

No adverse impacts to current or planned visitor services or recreation facilities are expected. Visitation to the museum could be limited and maximum daily visitation capped should project activities unreasonably interfere with other Main Post activities.

PARKING:

The proposed action will not greatly increase the demand for parking. Non-exclusive parking spaces will be allocated to the buildings to adequately accommodate the proposed use.

TRAFFIC:

The proposed action will not substantially increase traffic congestion, traffic volume, or adversely affect traffic safety for vehicles, pedestrians and bicyclists. Vehicular traffic will be about the same or slightly less than traffic levels estimated in the PTMP EIS. The tenant will participate in the Presidio Transportation Demand Management (TDM) program and submit a TDM plan to encourage its employees to use alternative transportation.

AIR QUALITY:

The proposed action will not substantially increase vehicle emissions or emissions of other air pollutants, or generate significant nuisance dust or odors. Feasible control measures for dust and construction emissions will be implemented to minimize adverse health effects as well as nuisance concerns such as reduced visibility and soiling of exposed surfaces.

NOISE:

The proposed action will not perceptibly increase the background noise levels or expose people to loud noise. Trust-enforced noise standards that specify conditions, working times, types of construction equipment to be used, and permissible noise emissions will be applied to minimize noise disturbance in the vicinity of the work site during the construction process.

ENERGY, WATER AND SOLID WASTE:

The proposed action will not substantially increase the amount of energy or water used, or waste generated within the Presidio. Water-efficient plumbing fixtures and high-efficiency heating and cooling equipment, lights and appliances will be installed during rehabilitation of the buildings. The buildings will meet or surpass the energy conservation requirements of the current California Title 24 energy code, where these requirements do not conflict with historic preservation objectives. The WDFW will comply with Trust waste management policies, which require tenants to develop a recycling program in conjunction with their activities at the Presidio, and coordinate their recycling program with the Trust.

LIGHT AND GLARE:

The proposed action will not perceptibly increase light or glare. Additional code-required lights installed for visual needs and public safety will be shielded and down-cast. Exterior lighting will be designed to ensure that the new lighting saves energy, reduces light trespass, minimizes illumination of the night sky and natural areas, and eventually fits into a cohesive design scheme for the Main Post.

VISUAL RESOURCES:

The proposed action will not block an existing view, be visually intrusive or contribute to a degraded visual condition. The courtyard addition to Building 104 will not extend beyond the walls of the building's "wings" and will be constructed below the eave line of the existing sloped roof to preserve the view from the rear of the building.

GEOLOGIC HAZARDS:

The proposed action will not increase the threat to public health and safety due to seismic hazards, as the buildings will be seismically upgraded to provide a reasonable level of structural safety for occupants and the public.

FIRE HAZARDS AND CRIME PREVENTION:

The proposed action will not create or contribute to a fire hazard or increase the demands for fire department or police services. Code-compliant fire protection upgrades will maintain a reasonable degree of fire protection based primarily on the life safety of the occupants and firefighting personnel. Adequate security systems will be installed for crime prevention.

CUMULATIVE IMPACTS:

The incremental adverse effects associated with the proposed action on cultural resources and traffic are not expected to be significant. The incremental contribution of the proposed action to the cumulative effect on visitor experience; visual resources; and parking within the Main Post will be neutral or beneficial.

REASONS FOR REJECTION OF ALTERNATIVES

The Trust has considered the following factors in choosing not to select the alternatives to the proposed action.

NO ACTION:

This alternative was rejected because it would not meet project needs. Mothballing of the buildings would only provide sufficient protection for a period of a few years, and would only slow down the deterioration of the buildings while they remain vacant. De-activated buildings would not contribute to the PTMP's public use goal to enliven the Main Post as a community center for a variety of visitor activities. Finally, this alternative would be detrimental to the park's financial welfare, since it would not generate any revenue to help operate the park.

PTMP USES WITH NO BUILDING 104 ADDITION:

This alternative was rejected because, after considerable time and effort, no sponsoring organization or other outside source with financial means to make building rehabilitation and reuse economically viable without limited new construction could be identified.

MEASURES TO AVOID OR MINIMIZE POTENTIAL ADVERSE ENVIRONMENTAL IMPACTS

All practicable mitigation measures identified in the EA to avoid or minimize environmental impacts that could result from project implementation will be incorporated into the proposed action. These mitigation measures will be monitored and enforced in accordance with the monitoring and enforcement program (MEP) provided in Attachment 1.¹ The Trust's Compliance Manager will be responsible for monitoring compliance with the MEP.

COMMENTS ON THE ENVIRONMENTAL ASSESSMENT

During the 30-day review period for the EA that ended September 18, 2006, the Trust received letters from the Fort Point and Presidio Historical Association (FPPHA) and San Francisco Architectural Heritage.² The FPPHA noted that the proposed action "has evolved greatly, and in the right direction," and were "pleased to learn of the emphasis on preserving the original fabric of all three of these buildings, and of the move to reduce the visual prominence of the new infill section in Building 108." San Francisco Architectural Heritage appreciated the approach to rehabilitating the historic buildings and observed that the proposed action "appears to have minimal impacts to the appearance of each structure and new uses will be sensitive to historic materials." Both historic preservation organizations offered detailed comments on the design of the project to

¹ See Attachment 1 (Mitigation Monitoring and Enforcement Program) to the PTMP Record of Decision.

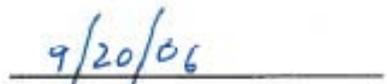
² These letters are available for public review at the Presidio Trust Library, 34 Graham Street.

consider as it progresses, most particularly with the proposed infill addition. Both organizations looked forward to the opportunity of providing further input following the conclusion of the NEPA process.

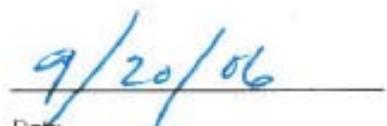
FINDING

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), monitoring and experience, including prior significance determinations documented in previous NEPA decisions, it is the determination of the Trust that the proposed action 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. No activities implementing the proposed action will involve resource effects warranting mitigations beyond those that are routinely adopted as conditions of Trust approvals for comparable projects. Implementation of the proposed action will not involve unique or unknown risks, cause loss or destruction of significant park resources, or violate any federal, state, or local law. Implementation of the proposed action is not precedent-setting nor will it automatically trigger other actions which may require environmental impact statements. Therefore, in accordance with the National Environmental Policy Act of 1969 and regulations of the Council on Environmental Quality (40 CFR 1508.9), an environmental impact statement will not be prepared.

RECOMMENDED:

 <hr/> John Helka Compliance Manager, Presidio Trust	 <hr/> Date
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APPROVED:

 <hr/> Craig Middleton Executive Director, Presidio Trust	 <hr/> Date
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**ATTACHMENT 1
MITIGATION MONITORING AND ENFORCEMENT PROGRAM**

MITIGATION MEASURE	REPORTING STAGE	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT
CULTURAL RESOURCES:				
COMPLIANCE WITH STANDARDS FOR BUILDING REHABILITATION All alterations and related building rehabilitation shall comply with the Guidelines for Rehabilitating Buildings at the Presidio of San Francisco, and the Secretary of the Interior's Standards for the Rehabilitation of Historic Properties.	Prior to Historic Building Modifications	Presidio Trust Federal Preservation Officer (FPO) in Coordination with Project Historical Architect	Presidio Trust Preservation and Maintenance Program	Require through Design and Construction Documents and Document in the Project's Administrative Record and Annual Report per PA
COMPLIANCE WITH STANDARDS FOR CULTURAL LANDSCAPE REHABILITATION Historic landscape rehabilitation shall conform to the Secretary of the Interior's Guidelines for the Treatment of Cultural Landscapes, and the treatment recommendation of the 2002 Cultural Landscape Assessment for the Main Post.	Prior to Historic Landscape Rehabilitation	Presidio Trust FPO in Coordination with Project Historical Architect	Presidio Trust Preservation and Maintenance Program and Grounds Maintenance Program	Require through Design and Construction Documents and Document in the Project's Administrative Record and Annual Report per PA
SECTION 106 CONSULTATION Neither the Trust nor the WDFE shall make any irrevocable commitment regarding project design until consultation under Section 106 of the National Historic Preservation Act has been concluded with the issuance of a Certificate of Compliance at the end of design development. Construction work shall not commence until the Certificate of Compliance has been issued.	Prior to Construction Activities	Presidio Trust FPO in Coordination with Project Historical Architect	Presidio Trust Preservation and Maintenance Program	Require as Lease Condition
TRAFFIC AND PARKING:				
TRANSPORTATION DEMAND MANAGEMENT The WDFE shall participate in the Presidio-wide Transportation Demand Management (TDM) program and submit and implement a TDM plan, which will describe how its employees and visitors will be encouraged to use alternative transportation to reduce automobile usage. The Trust shall monitor implementation and effectiveness of the TDM plan on an ongoing basis and may require the WDFE to implement more aggressive strategies or intensify components of the existing plan if TDM goals are not being reached.	During Project Implementation	Presidio Trust TDM Coordinator in Coordination with Project Employee and Visitor Transportation Coordinator	Presidio Trust Transportation Program	Require as Lease Condition

Note: These mitigation measures were established in the Walt Disney Family Museum Environmental Assessment (EA) or during its review and will be adopted and implemented by the Trust as part of the decision. Refer to Section 3 (Environmental Impact of the Proposed Action and Alternatives) of the EA for a background discussion of the mitigation measures.

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MITIGATION MEASURE	REPORTING STAGE	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT
PARKING MANAGEMENT In the future, the WDFP may be required to participate in a Main Post parking management program that may, among other policies, charge parking fees.	As Warranted	Presidio Trust Transportation Manager	Presidio Trust Transportation Program	Require as Lease Condition
CONSTRUCTION TRAFFIC MANAGEMENT The WDFP's construction contractor shall develop a Construction Traffic Management Plan prior to construction to provide specific routes and other measures to reduce potential conflicts with local and regional traffic, especially from the larger construction vehicles.	Prior to Construction Activities	Project Construction Contractor in Coordination with Presidio Trust Project Manager	Construction Traffic Management Plan	Require as Condition for Construction Permit
HAZARDOUS MATERIALS:				
LEAD AND ASBESTOS REMEDIATION The WDFP's construction contractor shall address asbestos, lead-based paint (LBP) or other hazardous materials in accordance with local, state, and federal environmental laws and standards. The WDFP shall submit an Asbestos Plan and LBP Remediation Plan for review and approval by the Trust to ensure that environmental impacts associated with lead and asbestos remediation work are avoided or minimized.	Prior to Construction	Project Contractor in Coordination with Presidio Trust Environmental Remediation Manager	Asbestos Plan and LBP Remediation Plan	Require Asbestos Plan and LBP Remediation Plan as Lease Condition
ARCHAEOLOGICAL RESOURCES:				
GROUND-DISTURBING ACTIVITIES The WDFP's archaeologist shall monitor planned subsurface excavation. As part of this monitoring program, excavation within the existing parking lot shall commence with the removal of the layers of asphalt and base rock. Once the soils beneath the base rock have been revealed, intact features or artifacts may be identified, recorded, and evaluated. Subsequent ground disturbance shall be monitored. If historic features or artifacts are encountered, the archaeologist, in consultation with the Trust, shall have the authority to halt construction until the find can be identified, recorded and evaluated.	Prior to Ground-Disturbing Activities	Project Archaeologist in Coordination with Presidio Trust Historical Archaeologist	Programmatic Agreement (PA)	Require as Excavation Permit Condition as Stipulated in PA
INSTRUCTION TO CONSTRUCTION PERSONNEL The WDFP's archaeologist shall alert construction personnel to the possibility of buried cultural remains, including prehistoric and/or historic resources. Personnel shall be instructed that the archaeologist on site has the ability to stop work in the immediate vicinity of any find. Once the find has been identified, plans for treatment and for the evaluation and mitigation of impacts to the find, if they are found to be National Register of Historic Places or California Register of Historical Resources eligible, shall be developed.	Prior to Initiation of Construction or Ground-Disturbing Activities	Project Archaeologist in Coordination with Presidio Trust Historical Archaeologist	PA	Require as Excavation Permit Condition as Stipulated in PA

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MITIGATION MEASURE	REPORTING STAGE	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT
TREATMENT OF DISCOVERIES If human remains are encountered during construction, work in that area shall halt and the San Francisco County Coroner shall be immediately notified. If the remains are determined to be Native American, then the Native American Heritage Commission (NAHC) shall be notified within 24 hours as required by Public Resources Code 5097. The NAHC shall notify the designated Most Likely Descendant who will provide recommendations for the treatment of the remains within 24 hours.	Immediately following Discovery	Project Archaeologist in Coordination with Presidio Trust Historical Archaeologist	PA	Document in Project's Administrative Record
AIR QUALITY:				
DUST EMISSIONS The WDFP's construction contractor shall implement feasible Bay Area Air Quality Management District (BAAQMD) control measures for dust emissions as appropriate to minimize adverse health effects as well as nuisance concerns such as reduced visibility and soiling of exposed surfaces. Basic control measures are as follows: 1) water all active construction areas at least twice daily; 2) cover all trucks hauling soil, sand, and other loose materials or require trucks to maintain at least two feet of freeboard; 3) pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas; 4) sweep when necessary (with water sweepers) all paved access roads, parking areas, and staging areas; and 5) sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets.	During Project Planning and Construction Activities	Presidio Trust Project Manager in Coordination with Project Construction Contractor	Presidio Trust NEPA Compliance Process	Require as Condition for Construction Permit
CONSTRUCTION EQUIPMENT EXHAUST EMISSIONS The WDFP's construction contractor shall implement U.S. Environmental Protection Agency recommendations to reduce construction equipment exhaust emissions. Measures are as follows: all construction equipment used at the construction site shall 1) not idle for more than ten minutes; 2) not be altered to increase engine horsepower; 3) include particulate traps, oxidation catalysts and other suitable control devices; 4) use ultra low sulfur diesel fuel with a sulfur content of 15 ppm or less or other suitable alternative diesel fuel, unless the fuel cannot be reasonably procured in the geographic area; and 5) be tuned to the engine manufacturer's specifications in accordance with a defined maintenance schedule.	During Project Planning and Construction Activities	Presidio Trust Project Manager in Coordination with Project Construction Contractor	Presidio Trust NEPA Compliance Process	Require as Condition for Construction Permit
NOISE:				
CONSTRUCTION NOISE The WDFP's construction contractor and other equipment operators shall comply with Trust-enforced noise criteria, standards and levels set forth in the San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code) to minimize noise disturbance in the vicinity of the project site during the construction process.	During Project Planning and Construction Activities	Presidio Trust Project Manager in Coordination with Project Construction Contractor	Presidio Trust NEPA Compliance Process	Require as Condition for Construction Permit

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MITIGATION MEASURE	REPORTING STAGE	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT
VISITOR USE:				
BUILDING PANELS AND PHOTOS Story board panels and approximately three to four historic photographs presenting and interpreting the historical significance of the buildings shall be installed near the entrance of each building.	During Project Planning	Presidio Trust Historian in Cooperation with Project Exhibit Designer	Presidio Trust NEPA Compliance Process	Require as Condition of the Lease and Document in Project's Administrative Record
BUILDING USE Building 104's small presentation theater and the multi-purpose area of Building 122 shall be used periodically, subject to WDFP's approval and availability, for lectures and presentations on subjects relating to the history and natural resources of the project area.	During District / Project Planning and Environmental Review	Presidio Trust Public Programs Manager in Cooperation with Project Events Coordinator	Presidio Trust NEPA Compliance Process	Require as Condition of the Lease
PRESIDIO INTERPRETATION PROGRAMS The WDFP shall participate in Presidio interpretation programs for the benefit of the public, whether in concert with the National Park Service (NPS) or otherwise. Such interpretive programs could include tours of the Presidio, exhibitions, and other programs under development to facilitate public understanding of the history, development and current use of the Presidio.	During Project Implementation as Warranted	Presidio Trust Public Programs Manager in Cooperation with Project Events Coordinator and NPS	Presidio Trust NEPA Compliance Process	Require as Condition of the Lease
PUBLIC ACCESS The WDFP shall ensure that the public has constant access to the front porch of Building 104, walkways and landscaped areas within the project site and to the reception areas in Buildings 104 and 122 and the coffee shop, and bookstore in Building 104 during business hours.	During Project Implementation	Presidio Trust Project Manager	Presidio Trust NEPA Compliance Process	Require as Condition of the Lease
ENERGY, WATER AND SOLID WASTE:				
ENERGY CONSERVATION The WDFP shall install high-efficiency heating and cooling equipment, lights and appliances during rehabilitation of the building to minimize energy consumption. The buildings shall meet or surpass the energy conservation requirements of the 2001 California Title 24 energy code, where these requirements do not conflict with historic preservation objectives.	During Project Planning	Presidio Trust Architect in Coordination with Project Architect	Presidio Trust Sustainability Program	Require as Building Permit Condition
WATER CONSERVATION The WDFP shall install water-efficient plumbing fixtures and implement other best management practices to encourage water conservation	During Project Planning	Presidio Trust Architect / Water Conservation Coordinator in Coordination with Project Architect	Presidio Trust Water Supply and Sustainability Program	Require as Building Permit Condition

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MITIGATION MEASURE	REPORTING STAGE	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT
SOLID WASTE MANAGEMENT The WDFP shall develop and implement a recycling program, including making recycling bins available at all activity sites, and setting aside indoor recycling areas to comply with Trust waste management policies.	During Project Planning	Presidio Trust Project Manager / Recycling Coordinator in Coordination with Project Architect	Presidio Trust Solid Waste Management Program	Require as Building Permit Condition
CONSTRUCTION DEBRIS MANAGEMENT The WDFP's construction contractor shall develop and implement a Construction Debris Management Plan with the aim to divert up to 75 to 80 percent of construction waste from landfills.	Prior to Construction Activities	Presidio Trust Project Manager / Recycling Coordinator in Coordination with Project Construction Contractor	Construction Debris Management Plan	Require as Condition for Construction Permit
LEED REQUIREMENTS The WDFP shall fulfill LEED (Leadership in Energy and Environmental Design) requirements to the extent practicable as listed in the Green Building (LEED-NC v2.2) Priorities Matrix prepared for the project to improve the quality of the buildings and make a positive impact on public health and the environment.	During Project Planning and Design	Project Green Building Consultant in Coordination with Presidio Trust Architect	LEED Rating System and Presidio Trust Design Review Process	LEED Project Certification and Document in the Project's Administrative Record
LIGHT AND GLARE:				
ARTIFICIAL LIGHTING The WDFP shall restrict the use of artificial lighting to those areas where security, basic human safety, and specific visual needs must be met. Where artificial lighting is required, minimal impact lighting techniques and shielding of artificial lighting shall be used. Installed lights shall be high efficiency, low glare, down-cast fixtures per the 2001 California Title 24 code and LEED-NC v2.2 guidelines for new lighting.	During Project Planning and Design	Project Architectural Lighting Consultant in Coordination with Presidio Trust Architect	Presidio Trust Design Review Process	Document in the Project's Administrative Record
GEOLOGY AND SOILS:				
STRUCTURAL SURVEY The WDFP's architect or structural engineer knowledgeable in historical structures shall survey the structural conditions of the building to document deterioration or signs of distress, and determine the details of the structural framing and the system for resistance of gravity and lateral loads. Details, reinforcement and anchorage of structural systems and veneers shall also be determined and documented. The results of the survey shall be utilized for designing modifications to the structural system to reach code compliance.	During Project Planning and Design	Presidio Trust Project Manager in Coordination with Project Structural Engineer	Presidio Trust NEPA Compliance Process	Require as Building Permit Condition

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WATER RESOURCES:				
STORMWATER The WDFW's civil engineer shall develop a Stormwater Management Plan (SMP) to reduce impervious cover, promote infiltration, and capture and treat stormwater using structural and operational best management practices (BMPs). BMPs shall be designed in accordance with the Trust's stormwater pollution prevention program. Potential technologies and strategies to be considered shall include use of alternative surfaces (e.g., pervious pavement or grid pavers) and nonstructural techniques (e.g., vegetated swales and filters).	During Project Planning and Design	Presidio Trust Engineering/Utilities Manager and Natural Resources Program Manager in Coordination with Project Civil Engineer	Presidio Trust NEPA Compliance Process	Incorporate BMPs into SMP and Project Plans and Document in Project's Administrative Record
GROUNDWATER Geothermal systems that are being explored to regulate the use of heating and cooling resources shall comply with requirements prescribed in California Department of Water Resources standards, including use of best available technology (BAT) or state-of-the-art technology, to provide a suitable level of protection for groundwater resources.	During Project Planning and Design	Presidio Trust Engineering/Utilities Manager in Coordination with Project Civil Engineer	Presidio Trust NEPA Compliance Process	Incorporate BAT into Project Plans and Document in Project's Administrative Record
BIOLOGICAL RESOURCES:				
NESTING BIRDS Cut or prune ornamental shrubs within the project site only outside of bird nesting season (currently March 1 to August 15) unless Trust monitoring indicates nesting birds are not present	During Project Planning and Construction Activities	Presidio Trust Project Manager in Coordination with Natural Resources Program Manager	Presidio Trust NEPA Compliance Process	Incorporate Measure into Project Plans and Document in the Project's Administrative Record
TREE PRESERVATION The mature cypress tree situated on the southeast side of Building 104 shall be fenced during construction and protection measures in the Trust's Tree Preservation Specifications shall be followed in order to minimize effects to the tree root systems as much as possible.	During Project Planning and Construction Activities	Presidio Trust Project Manager in Coordination with Forestry Manager	Presidio Trust NEPA Compliance Process	Incorporate Measure into Project Plans and Document in the Project's Administrative Record
CLIFF SWALLOWS If construction is proposed during the breeding season of the small colony of Cliff Swallows that has been known to nest on the Montgomery Street barrack buildings, no earlier than three days before the start of work, a qualified wildlife biologist shall survey for the presence of swallows at and within the immediate vicinity of the planned work. If active nests are present, the project shall be redesigned or project timeline modified in accordance with the biologist's recommendations to avoid take. If avoidance is not feasible, the USFWS shall be consulted under the Migratory Bird Treaty Act.	No Earlier than Three Days before Start of Work	Presidio Trust Project Manager in Coordination with Natural Resources Program Manager	Presidio Trust NEPA Compliance Process	Incorporate Measure into Project Plans and Document in the Project's Administrative Record

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MITIGATION MEASURE	REPORTING STAGE	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT
MIGRATORY BIRDS The Trust shall work with the WDFP to ensure that museum activities avoid or minimize, to the extent practicable, adverse impacts on migratory birds.	During Museum Operation	Presidio Trust Natural Resources Program Manager	Presidio Trust NEPA Compliance Process	Document in the Project's Administrative Record
BATS Prior to construction, the buildings shall be visually investigated by qualified personnel to determine if bats are using the structure for roosting. Should any sign of bats be identified, recommendations shall be made on how to minimize / mitigate any impacts to the bat population.	Prior to Construction Activities	Presidio Trust Project Manager in Coordination with Natural Resources Program Manager	Presidio Trust NEPA Compliance Process	Incorporate Measure into Project Plans and Document in the Project's Administrative Record
FIRE HAZARDS AND CRIME PREVENTION:				
LIFE-SAFETY Prior to building rehabilitation, the WDFP shall submit construction documents and shop drawings for review and approval by the Presidio Fire Department fire inspector as part of a life-safety evaluation. Construction documents shall include all fire prevention requirements for the proposed use, including an automatic fire-extinguishing (i.e., sprinkler) system and fire alarm systems. Shop drawings and equipment specifications shall comply with the requirements of the National Fire Protection Association (NFPA) Fire Codes and Life Safety Codes and the Presidio Trust Tenants Handbook. Preservation of the integrity of the historic building shall be effectively integrated with fire management through the use of "minimum impact" techniques. The Presidio Fire Department fire protection inspectors will issue permits once requested submittals have been reviewed and approved, inspect construction in progress, and provide life safety inspection of subsequent occupancy and public education to reduce fire loss.	Prior to Building Rehabilitation and During Occupancy	Presidio Trust Project Manager in Coordination with Presidio Fire Department Fire Protection Inspector and Project Fire Consultant	Presidio Fire Department Life-Safety Evaluation and Inspection Process	Require as Building and Fire Permit Conditions
SECURITY The WDFP shall submit construction documents and shop drawings to the U.S. Park Police (USPP) for security code compliance and installation of adequate security systems.	Prior to Building Rehabilitation	Presidio Trust Project Manager in Coordination with USPP and Project Security Consultant	USPP Security Code Compliance Process	Require as Building Permit Condition



Source: Presidio Trust 2006



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