ATTACHMENT 6 RESPONSES TO COMMENTS RECEIVED ON THE PRESIDIO TUNNEL TOPS EA
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The Trust made the EA available for public review on October 28, 2015 (Trust 2015e). The Trust’s announcements invited public comment for a 45-day period, which was extended by 36 days (concluding January 19, 2016) in response to public comment (Trust 2015f). During the public comment period, the Trust held two informational workshops on November 4 and December 3, 2015 to provide participants the opportunity to learn more about the project and issues covered in the EA, and to provide comments. Additionally, the Trust offered eight site tours between October 30, 2015 and January 15, 2016.

By the close or shortly after the public comment period for the project that ended January 19, 2016, the Trust received three letters, five emails and four comment cards from 10 interested individuals, two organizations and one public agency (see table below).1 Several of the comments were nonsubstantive, generally expressing support for the project, and therefore required no response.

INDIVIDUALS, ORGANIZATIONS AND PUBLIC AGENCIES SUBMITTING COMMENTS ON THE PRESIDIO TUNNEL TOPS ENVIRONMENTAL ASSESSMENT

Individuals
Molly Cargas
Whit Hall
Raymond Holland
Amy Meyer
Dale and Gloria Telegan
Sharon Tsiu
Xiluo Wang
Georgeanne Wedergren
Paul Wermer

Organizations
Golden Gate Audubon Society
Neighborhood Associations for Presidio Planning

Public Agencies
United States Department of the Interior, National Park Service,
Golden Gate National Recreation Area

1 Comments submitted by the National Park Service and the State Historic Preservation Officer (SHPO) on the Preliminary Finding of Effect (Attachment 2 of the EA) and the Supplemental Design Guidelines (Attachment 4 of the EA) were addressed as part of the National Historic Preservation Act Section 106 consultation process. The NPS and SHPO letters are provided in Attachment 3 of the EA.
The Trust fully assessed all issues raised by the comments received during the review period. In response to the comments, the Trust affirms it will:

- continue to engage the public during the design process (Public Participation);
- monitor traffic volumes and intersection operating conditions, adjust transportation demand management (TDM) measures and make roadway improvements (Transportation);
- increase the frequency of PresidiGo as ridership increases (Transportation);
- collect and share visitor data at key locations and inside the Presidio Visitor Center to better understand visitation patterns to support ongoing management of the area (Visitation);
- ensure that all project features preserve or enhance historic views (Cultural Resources);
- adopt best practices to prevent the spread of pathogens and invasive plants during construction (Biological Resources);
- further increase water efficiency during the design process through more efficient irrigation systems, recycled water usage, onsite stormwater capture, and limiting turf wherever possible (Water Resources); and
- explore options during the design process to reduce the traffic noise level in areas near the tunnel portals (Noise).

A summary of public comments received during the review period on the Presidio Tunnel Tops Environmental Assessment with responses to the key issues and concerns raised are as follows:

**Purpose and Need**

**Comment:** The Trust should only use those goals listed in the Purpose and Need to weigh or eliminate alternatives (NPS).

**Response:** In response to the comment, the rationale for eliminating marsh expansion from further study has been revised to align with the Purpose and Need goals as follows:

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

Consistency with Land Use Plans and Policies

**Comment:** The EA should include the Sports Basement EA in this section (NPS).

**Response:** Sections 1502.16(c) and 1506.2(d) of the CEQ regulations require NEPA documents to discuss any inconsistency of a proposed project with any approved land use plans or policies. The term “land use plans” includes formally adopted documents for land use planning, such as the PTMP, and related regulatory requirements. The Sports Basement EA does not constitute a land use plan or policy for purposes of the discussion. Nonetheless, there are no potential conflicts between the Presidio Tunnel Tops and Sports Basement. The Sports Basement is addressed in the cumulative impact analysis at the end of the Section 4, Environmental Consequences.

Transportation

**Comment:** The Trust should increase the availability of public transit routes in the Presidio to immediately reduce the number of private automobiles traveling through and being parked in it (Raymond R. Holland).

**Response:** The Trust supports public transit routes serving the Presidio. As the Presidio population of visitors and employees increases, the demand for public transit will also increase, warranting service enhancements. The Trust requested SFMTA extend the 29 MUNI route to Fort Scott and extend the 44 MUNI route to the Main Post. We welcome community support of these proposals and other transit improvements. The Trust is also taking action to improve transit access in less direct ways. For instance, the Trust is currently pursuing design and construction of the Greenwich Gate and remaining portion of the Presidio Promenade multi-use trail, which will substantially improve the connection to the 41 and 45 MUNI routes that terminate at Lyon/Greenwich.

**Comment:** The Trust and others should do a much better job of “branding” the Presidio to establish more Muni transit routes between the City and the park and ensure that such information is readily available to and understandable by visitors (Raymond R. Holland).

**Response:** In recent years, the number of visitor destinations in the park has increased, and the number of park visitors is expected to grow further as the remaining vacant buildings in the park are occupied. The Trust has intensified efforts to welcome the public, including marketing efforts like those described.
by the commenter. The Trust is also taking steps to make PresidiGo shuttle information more widely available and accessible. The PresidiGo schedule is already integrated with Google maps, and the Trust shares PresidiGo real-time arrival information with various third party apps so that visitors can more easily find information about PresidiGo shuttle service across multiple digital platforms. The Trust recently reformatted PresidiGo information on its website (www.presidio.gov) to be more user-friendly. Event sponsors are also encouraged to promote transit, walking and biking in their promotional materials. This is an area of continued effort and focus with growth in visitation.

**Comment:** The Trust should have a monitoring and adaptive management plan in place to be prepared for implementation of signals to manage traffic (NPS).

**Response:** The Trust will collect comprehensive traffic data throughout the park after some critical park roadways reopen from construction-related closures in 2018. In addition to intersection turning movement counts during weekday commute and weekend peak periods, the Trust will also gather continuous machine counts for a week-long period. A study will be conducted to better understand if and how pass-through traffic patterns have changed in recent years. The construction of the Presidio Parkway has closed at least one major roadway in the park since 2010, and this upcoming data collection effort will be the Trust’s first opportunity to collect traffic data with its complete roadway network. The data will allow the Trust to monitor traffic volumes and intersection operating conditions, and compare current conditions to traffic projections from the PTMP EIS and subsequent studies. As it has in the past, the Trust will continue to collect traffic data periodically to monitor traffic conditions, plan roadway improvements and adjust TDM measures. Based on the results from the 2018 data collection effort, the Trust will develop a schedule for gathering future traffic data.

**Comment:** The EA should include the Mason Street/Marine Drive intersection as well as Crissy Field Avenue and McDowell Avenue (north end) (NPS).

**Response:** The requested intersections are farther removed from the project area, and consequently were not included as study intersections. A recent study completed for the Crissy Field corridor evaluated the intersection of Mason Street/Marine Drive, which is expected to operate at LOS A under long-term weekday peak hour and weekend peak hour conditions. Per the Presidio Trails and Bikeways Master Plan, the one-way uphill portion of Crissy Field Avenue is planned to be closed to vehicular traffic and converted to a multi-use trail, which would effectively eliminate the intersection of Crissy Field Avenue/McDowell Avenue.

**Comment:** The Trust should increase PresidiGo’s frequency to Crissy Field from the Transit Center, particularly during weekends (NPS).
Response: The Trust intends to increase the frequency of PresidiGo as ridership demand increases. The completion of Presidio Parkway construction and the Presidio Tunnel Tops project would also substantially improve pedestrian access between Crissy Field and the Main Post. With this improved pedestrian access, many people are likely to choose to walk from the Transit Center to Crissy Field rather than transfer to the PresidiGo Crissy Field route.

Comment: The EA should state the assumptions around trip generation for open space and underlying building uses along Mason Street (NPS).

Response: Trip generation rates for open space components of the Presidio Tunnel Tops project are provided in Table 5 of the EA and are derived from Crissy Field data. There are very few available data sources for open space trip generation rates, and although the uses are not exactly the same, the uses are similar and Crissy Field has a similar geographic location. The open space trip generation rates vary across alternatives based on the percentage of usable space in each alternative as discussed.

All buildings along Mason Street were assumed to be occupied, based on the best available information. Building 610 was assumed to be a cultural/educational use as envisioned in the PTMP. Building 643 was assumed to be industrial/warehouse use per an interagency agreement with the NPS. Stillwell Hall (Building 650) and adjacent Building 651 were assumed to be lodging per the PTMP.

Comment: The EA should clarify what peak period for level of service (weekday, weekend, peak weekend) is used as a performance standard (NPS).

Response: The EA provided weekend conditions as a point of reference, but the Trust will not propose intersection signalization based on traffic conditions that only occur on peak weekends. If an intersection functions at an acceptable level of service on weekdays, but at an unacceptable level of service on a typical weekend, more intensive TDM measures to mitigate weekend conditions will first be implemented. Such measures might include adjusting weekend parking fees or operating more frequent weekend PresidiGo service. The Trust recently implemented a differential parking fee structure, including higher weekend parking fees in areas that are more crowded on weekends. Such strategies are components of an adaptive management plan to monitor and manage traffic conditions.

Comment: The EA should include the Sports Basement EA transportation impact analysis in the intersection analysis (NPS).

Response: The traffic analysis in the EA is cumulative in nature, and consequently assumed the Mason Street Warehouses (Buildings 1182-1188) are occupied by Sports Basement as evaluated in the Sports Basement EA.
Parking

Comment: The EA should not assume paid parking on Crissy Field beyond what is in place currently (NPS).

Response: The EA simply identifies parking management in Area A as a measure to address potential spillover impacts to parking areas in Area A. The Trust has also implemented other Transportation Demand Management (TDM) measures, but parking management (fees and/or time restrictions) is typically the backbone of any TDM program. If the NPS is unwilling to implement parking fees in Crissy Field (Area A) and finds spillover parking unacceptable, time restrictions or other parking management measures could be considered.

Comment: The EA should clarify whether parking utilization assumes fully projected building occupancy (NPS).

Response: Table 8 in the EA identifies current parking utilization and is intended to provide context for the discussion of projected future parking conditions. The table identifies projected parking demand and supply and assumes occupancy of currently vacant buildings (i.e., full buildout) in both the Main Post and Crissy Field districts.

Comment: The EA should explain, if events are proposed to be capped at 1,200 persons to ensure that supply meets demand, how the number of persons affects or translates to parking supply given that event participants may arrive at the site by many different modes of transportation (NPS).

Response: A 1,200 person event is expected to generate parking demand for approximately 435 vehicles if event transportation were not managed. Permitted events of such size, however, are typically managed, and allowed the use of a very limited amount of parking. Event organizers must provide a transportation plan for the approximate number of participants and spectators, and are strongly encouraged to promote transit, various taxi/ride share services, walking and biking to event participants. Depending on the size and nature of the event, some organizers charter bus service.

Comment: The EA should clarify how the objective of increasing parking supply in key areas to meet demand to minimize the negative effects of motorists circulating in search of available parking will be achieved for Alternative 3, which proposes the least amount (amongst alternatives) of parking on the project site to meet demand (Amy Meyer, NPS).

Response: Increasing parking supply outside the project site but in a centrally located area of the Crissy Field (Area B) district will be within reasonable walking distance of most Crissy Field uses as well as the Main Post, and could act as a shared parking resource for both districts. The demand for parking in these
districts often varies by time of day and day of week based on the surrounding uses, and a supply of parking in a centralized location in the park could efficiently serve multiple uses with demand that peaks at different times.

Visitation

Comment: The EA should clarify impacts associated with a growing youth program at the Youth Campus (NPS).

Response: The 3 acre Youth Campus will be comprised of the Crissy Field Center and its associated secured courtyard and the adjacent, public outdoor experience, the Learning Landscape. A new Field Station will serve the public as a gateway to the Learning Landscape and the newly renovated Crissy Field Center (Building 603). A small new building will include a Science Lab and Art Lab that expands the capacity of the Crissy Field Center youth programs. The features of the Youth Campus will focus on these themes: gathering, play, discovery, learning and environmental leadership. The Learning Landscape will be organized around a main looping path that connects a series of rooms within dune-inspired landscape. It will be designed for a wide variety of nature play experiences that provide a range of physical challenges, as well as opportunities for learning, discovery and creative engagement. The age range for these elements will run from toddler through thirteen, with some elements geared towards teens and the high school students involved in the youth mentorship programs.

The impacts of the Youth Campus, Learning Landscape, Field Station and renovated Crissy Field Center are taken into account in the evaluation in Section 4, Environmental Consequences of the EA. Of the expected 1,857 people at one time visiting the project site on a peak weekday during the school year, approximately 459 (25 percent) would be associated with the youth program. On peak weekends during the summer, about 619 (23 percent) of the 2,749 people at one time at the project site would be engaged in activities at the Crissy Field Center and Youth Campus. According to the Golden Gate National Parks Conservancy, over time, it is expected that approximately 100,000 youths will be served by the Crissy Field Center and Youth Campus programs annually. Circulation throughout the campus is designed to ensure that the arrival of the public and the gathering of school children will be managed to minimize impacts on the overall visitor experience and parking at Crissy Field. Detailed information on the Youth Campus are provided in the most recent design documents submitted by James Corner Field Operations (2017) and were made available to the NPS for review and comment.

Comment: The Trust should confirm whether retail, food service and restrooms are anticipated to be accommodated within the project and elsewhere (NPS).

Response: The following table is being provided at the request of the NPS. The table shows the proposed increase in services that would occur within the project area.
VISITOR SERVICES WITHIN THE PROJECT AREA

<table>
<thead>
<tr>
<th>Building</th>
<th>Gross Square Feet (gsf)</th>
<th>Retail (gsf)</th>
<th>Food Service (gsf)</th>
<th>Restrooms</th>
</tr>
</thead>
<tbody>
<tr>
<td>Presidio Visitor Center (Building 210)</td>
<td>6,430</td>
<td>1,286</td>
<td>—</td>
<td>Staff Only</td>
</tr>
<tr>
<td>Transit Center (Building 215)</td>
<td>1,848</td>
<td>—</td>
<td>1,133</td>
<td>Public</td>
</tr>
<tr>
<td>Food/Retail Building (Building 201)</td>
<td>6,200</td>
<td>3,100</td>
<td>3,100</td>
<td>Public</td>
</tr>
<tr>
<td>Crissy Field Center (Building 603)</td>
<td>11,801</td>
<td>—</td>
<td>—</td>
<td>Program Users Only</td>
</tr>
<tr>
<td>Field Station &amp; Classroom</td>
<td>6,528</td>
<td>—</td>
<td>—</td>
<td>Public</td>
</tr>
</tbody>
</table>

Comment: The EA should clarify whether 1,200 is the cap per individual event or the cap for multiple events totaled together for one day (NPS).

Response: Twelve hundred represents the total number of people at one or more outdoor programs or events at any one time within the project site. The types of programs envisioned for the project site are small to moderate in scale. A program approval process will be implemented to ensure that the cap is not exceeded, and that programs are not scheduled for days with high general visitation to the site. The cap will minimize the need to implement program mitigation measures, other than normal crowd control management to ensure visitor comfort during the programs.

Comment: The EA should provide a reference for the statement that Crissy Field has more visitors than originally designed to accommodate (NPS).

Response: The assertion is supported by the following finding reached on page 46 in the draft Crissy Refresh Study (Golden Gate National Parks Conservancy 2014):

Finding – Improve Circulation & Access

Vehicle, bicycle and pedestrian conflict points are of high concern at Crissy Field. Crissy Field has more visitors than originally designed for. As a result, the parking, circulation and access to Crissy Field are confusing, frustrating and can be perceived as unsafe.

A reference to the draft study has been provided in the EA.
Comment: The EA should explain why more visitors from Crissy Field would reroute their trip through the Presidio Tunnel Tops than visitors to the Presidio Tunnel Tops would discover Crissy Field (NPS).

Response: As advised by the NPS during scoping, the EA assumes limited programming and visitor amenities in the mid-Crissy Field (existing conditions) area as the baseline for the visitation analysis, with a reference to “refresh” repairs and improvements in the evaluation of cumulative impacts. The current lack of visitor facilities in mid-Crissy Field area is in stark contrast to the proposed features at the Presidio Tunnel Tops, which is viewed as the gateway to the Presidio and the “best place to begin a Presidio experience.” The project site boundaries also includes the Visitor Center, which would attract more visitors. For this reason, it is expected that the more programmed areas and visitor attractions would draw more visitors to the Presidio Tunnel Tops from Crissy Field than vice versa. This assumption for the purposes of planning may need to change should the strategies and potential improvements in the mid-Crissy area come to pass, and monitoring may be warranted. Meanwhile, the Trust will continue to coordinate with the NPS on future Crissy Refresh projects and initiatives to strengthen the connection between the Main Post and Crissy Field.

Comment: The EA should clarify how Alternative 3 would deliver “greater participation by the local and regional population” than the other alternatives (NPS).

Response: Among the alternatives, Alternative 3 would provide the most diverse recreational opportunities offered within the project site, which would encourage the widest participation by the local and regional population, especially those that are not traditional park visitors. The Trust will make efforts for programming purposively aimed at engaging a wider audience that reflects the diversity of the Bay Area. The Trust will improve public transportation opportunities to help connect the larger audience to the Presidio Tunnel Tops and the Presidio, as we have done in the past. We believe the lack of visitor amenities and programmed areas within the other alternatives might not encourage as much connection to the diverse local and regional population.

Comment: The Trust should commit to monitoring visitor use at the Presidio Tunnel Tops and developing an adaptive management program (NPS).

Response: The Trust has been collecting visitor data throughout the Presidio for several years, including maintaining automated counting devices along various trails and visitor destinations that count pedestrians, bicycles, and in some cases, automobiles. The data is shared with the NPS and the Golden Gate National Park Conservancy and is very useful in support of park management activities, reporting and fundraising efforts. We intend to continue this work at the project site with the installation of new counters at key locations, both inside the Visitor Center and on site, to gain a comprehensive understanding of visitation patterns to support ongoing management of the area.
In addition to automated counting, the Trust and its partners completed a comprehensive visitor intercept survey (with a follow-up phone survey) in 2008. The survey, one of the most comprehensive efforts of its kind in the national park system at the time, collected data to understand park visitation (e.g., demographics, socioeconomics, mode of travel, likes and dislikes, etc.) and establish a baseline from which future surveys could be evaluated. Given the Presidio Tunnel Tops opening and other park enhancements (physical and programmatic) that have occurred since 2008, the timing may be ripe to repeat the survey.

**Cultural Resources**

**Comment:** The Trust should continue the Section 106 process as the final design evolves (Paul Wermer).

**Response:** The Trust conducted the Section 106 process according to its Programmatic Agreement (PTPA) agency outreach and consultation requirements that maximized opportunities for public and signatory party involvement. The Section 106 process informed the development and selection of alternatives in the EA, the assessment of effects, and changes to the final project design in order to reflect agency and public input, thus meeting the purpose and intent of Section 106. This process included providing the signatory parties additional opportunities to review the project design prior to reaching consensus on the conditional finding of no adverse effect. The process has concluded as required by the regulations in order for the Trust to move forward on the project. Should final landscape design evolve to the point that additional alternatives to address historic resources will need to be developed, the Trust will revisit its decision and revise or supplement the EA.

**Comment:** The Trust should take a holistic approach to preserving the historic setting in schematic design (NPS).

**Response:** The Trust studied the project area extensively, and used applicable planning and design guidelines, treatment recommendations from cultural landscape reports and building-specific studies to guide the design process from conceptual through schematic design. The studies included the Presidio Trust Management Plan district guidelines, the Main Post Planning & Design Guidelines and Cultural Landscape Report, the Mid-Crissy Area Design Guidelines and other site-specific design guidelines. These documents address the importance of views, and direct that new elements remain compatible with and subordinate to the historic landscape. The Cultural Landscape Report (CLR), for instance, advises that “new designs for areas affected by the construction of Presidio Parkway are compatible with the historic features of the Main Post and preserve or enhance historic views from the Main Post to the bay” (treatment recommendation G1, page 295). In response to the comment, the CLR treatment recommendation has been made a mitigation commitment in the EA to be monitored during the design process.
Comment: The signatory parties to the PTPA do not concur with the Trust's determination of “no adverse effect” for the project based on the schematic design analyzed in the Preliminary Finding of Effect (NPS, SHPO).

Response: The Trust consulted with the NPS and SHPO in 2016 and 2017 in order to identify changes to the project design that were needed to achieve their concurrence with a finding of no adverse effect for the project. Design changes included the elimination of the New Observation Post building, simplification of the path network on the bluff top, modifications to the terraced seating element, and reductions in the height of berms at the Learning Landscape and Western Hollow areas. The Trust will also complete additional consultation on the play elements in the Learning Landscape and the covered seating at the Transit Center under the terms of an agreement reached on a conditional no adverse effect determination for the project (Trust, 2017b).

Light and Glare

Comment: The Trust should share more about the “dark skies” features of what is planned as the Presidio is mostly dark at night and the project design should help protect that darkness (Amy Meyer). Should the Youth Center and Learning Landscape be used at night, path lighting could cast light pollution around Crissy Marsh (Sharon Tsiu).

Response: Site lighting for the project is intended to be simple, consistent and discrete while enhancing the visitor experience. Light levels will be designed according to the character of the spaces in the project and according to the Final Report of the Presidio Parkway Project Lighting Recommendations and the joint International Dark Sky Association/Illuminating Engineering Society Model Lighting Ordinance (2011). Luminaire types will be selected with consideration for the site topography, targeted light levels, longevity (durability), ease of maintenance and with sensitivity to views and the naturalistic nighttime environment. Lighting controls will be coordinated with an astronomical timeclock that turns on/off the light at dawn and dusk. Dimming of fixtures via motion sensors will be considered where applicable for energy conservation.

Biological Resources

Comment: The Trust should not use the Crissy Field Marsh Expansion Study as a rationale for rejecting marsh expansion in the project area (NPS).

Response: As noted by the commenter, the EA provides many reasons for not expanding the marsh within the project site. The Crissy Field Marsh Expansion Study is referenced because it makes clear that marsh expansion in areas near the flood shoal would provide the most benefits. This is an important factor that should be used to inform subsequent planning and decision-making and will by no means preclude lower priority areas for enlarging the marsh.
**Comment:** The Trust should describe additional measures to prevent the spread of pathogens and invasive plants during construction (e.g., cleaning and disinfection of tools, vehicles, boots, etc.) (NPS).

**Response:** In response to the comment, a new measure to protect native plant communities has been added. Note the Trust has recently prepared management guidelines (Trust 2017a) and is initiating their use to address destructive plant pathogen and exotic invasive species within the Presidio. Best practices included in the guidelines will help produce cleaner planting materials, improve sanitation, monitor for pathogens, evaluate imports and treat materials where appropriate. As our understanding of the issue improves, the guidelines will be modified and updated to reflect necessary changes.

**Comment:** The EA should note other common fish in the Crissy Field Marsh and that the marsh supports a variety of crustaceans and benthic invertebrates (NPS).

**Response:** The Trust thanks the NPS for the information, which has been added to the EA.

**Water Resources**

**Comment:** The Trust should reduce the lawn area further and select native meadow wildflowers and bunch grasses to echo the bluff plantings instead of the Main Parade to bring Alternative 3 much closer to the water demand of Alternative 1 (Amy Meyer, Golden Gate Audubon Society).

**Response:** As noted in the EA, the landscape will be designed to conform with the State’s recently adopted Model Efficient Landscape Ordinance, which among other requirements, limits the portion of landscapes that can be covered in turf. Additionally, the landscape will be designated as a Bay-Friendly Rated Landscape, which refers to a comprehensive approach to the design, construction and maintenance of healthy, environmentally-sound landscapes to reduce waste and protect the watersheds and communities of the San Francisco Bay Area.

The landscape design is organized around a series of planting zones: ornamental gardens, meadows, lawns, coastal woodland, coastal riparian, bluff, and dunes. Within these planting types, approximately 50 percent of the plants will be indigenous to the Presidio, with the rest being California-native or non-invasive introduced species. Management and conservation of water used for irrigation of landscaped areas will be realized through the distinct irrigation zones. The purpose is to maximize the efficient use of irrigation water by allocating more water to areas where it will have the greatest impact, i.e., in the immediate vicinity of high and medium high water use landscape areas such as turf areas, and less water to areas with medium water use landscapes such as shrub areas and low water use landscapes such as slopes with drought tolerant plant materials. Plants having similar water requirements will be grouped together in the same zone (low water users in one zone, moderate water users in another). Each zone will be irrigated separately and with the most appropriate type of irrigation system. In this way, the frequency and amount of water being applied through irrigation will be carefully controlled so as to...
avoid needless over-watering that results when plants that have both high and low water requirements are mixed together.

The latest schedule showing annual water use and irrigation methods for the various landscape types in the proposed project is provided in the Hydrozone Plan (see Figure 6-1). While there will be a nominal increase over current water demands, this increase is not expected to substantially change projected water usage for the Presidio. The Trust may elect to offset the increase in water usage by not irrigating other areas within the park.

**Comment:** The Trust should provide native plantings closer to the Presidio Visitor Center to enhance the national park experience, and offer educational opportunities about native plants, wildlife and water conservation (Golden Gate Audubon Society).

**Response:** The Presidio Visitor Center (Building 210) and its surrounding landscape is visually connected to the Main Post and will be planted in keeping with the cultural landscape of the Main Post. Plants for these areas will have low to medium water requirements and will include species that are attractive to birds and butterflies. The plantings will transition to more native plant communities along the bluff and in the lower areas close the Mason Street and Crissy marsh, offering more educational opportunities about native species. Educational opportunities about wildlife and water conservation will be possible throughout the project site.

**Comment:** The Trust should further reduce impervious surfaces during schematic design and implement irrigation practices that minimize water use (Amy Meyer, Sharon Tsiu, NPS).

**Response:** As noted in the EA, the Trust will carefully design project landscapes for their intended function. Landscape and Irrigation Design Plans will be submitted during schematic design and design development that will meet the design criteria and requirements listed in the State’s Model Water Efficient Landscape Ordinance and conform to the Trust’s irrigation guidelines. For the efficient use of water, the Trust will select water-conserving plant and turf species, especially local native plants; and will select plants based on local climate suitability, disease and pest resistance. The Trust will audit the performance of the irrigation system in-depth periodically to prevent overspray or runoff that causes overland flow. Implementation of pervious surfaces as well as other BMPs to reduce the impact of impervious surfaces will be evaluated during the design process.

**Comment:** Trails should have permeable surfaces where possible (Amy Meyer).

**Response:** Permeable surfaces will be applied within smaller garden paths, the fire circle, outdoor classrooms and play areas in the Learning Landscape, the Youth Collaborative courtyard, the central Zocalo feature and a portion of the picnic area adjacent to Building 201.
FIGURE 6-1 HYDROZONE PLAN
Comment: The Trust should install water bottle refill stations to encourage reusable water containers and discourage plastic (Georgeanne Wedergren).

Response: We appreciate the suggestion and are making permanent public water sources available throughout the Presidio. At least one outdoor water bottle refill station (tap station) will be installed at a convenient location within the project area to provide free drinking water to visitors.

Cumulative Impacts

Comment: The EA should more accurately reflect the full range of reuse options GGNRA may consider in the future for Building 1199 (NPS).

Response: The reuse options and descriptions in the EA for Building 1199, one of the eight projects relevant to the cumulative impact analysis, were based on suggestions made at GGNRA's August 7, 2013 5X/Project Review Meeting for possible uses of the building if it became permanent (see The Future of the Crissy Field Center Building 1199, PEPC 48537) (NPS 2013). The suggestions made for the area if the building were removed (i.e., the existing management direction or the “No Action”) were inadvertently not included in the EA. The Trust understands that at this time there is no proposed action and a preferred alternative has not been identified. Therefore, in response to the comment, the EA has been revised to read as follows:

- Potential long-term use of Building 1199 (temporary Crissy Field Center) for as-yet-undefined park-related and public uses (NPS): Suggested uses include reuse or repurpose for East Beach; lease for income; kayak, bike and other recreational equipment rentals; food service or event rental; outpost for Crissy Field Center (Building 603). Suggested uses should the building be removed include a picnic area, parking for East Beach and elevated walkways.

Miscellaneous

Comment: The Trust should explore options to reduce traffic noise emanating from the Presidio Parkway east-facing west tunnel (Molly Cargas, Amy Meyer).

Response: The Doyle Drive EIS/R noted that elements of the tunnel design may affect receptors in areas near the tunnel portals. As the project progresses towards final design and construction, the Trust will investigate a variety of noise barrier options, in terms of both material and design, that can reduce the traffic noise level.

Comment: The Trust should reconsider the Compass Rose being built directly into the walkway, as it is unreasonable to assume that visitors would look at any didactic content on a traveled pathway surface (Whit Hall).
Response: The compass rose is only one of a series of interpretive features being considered for the Presidio Tunnel Tops that when combined with the Presidio Visitor Center, will interpret the rich military history of the Presidio. During the design phase, we will explore ways to elevate the visibility of this feature and to connect visitors more deeply to the stories of the individual soldiers that served in the engagements being commemorated.

Comment: The Trust should eliminate the “Zocalo” name for the non-historic plaza area given the historical significance of the Zocalo in Mexico City (Amy Meyer, Paul Wermer).

Response: The Trust will explore other names for this feature.

Comment: The Trust should disclose how pets brought by visitors into the project site would be managed (Georgeanne Wedergren).

Response: Dogs will be required to be on leash at all times. Dog-waste stations with clean-up bags to facilitate pet waste removal will be provided should the need arise.