

TENNESSEE HOLLOW
Upper Watershed
Revitalization Project EA

Response to Public Comments & Final FONSI
December 2007

VISION

Imagine discovering the very beginnings of a creek—watching water seep from the ground, and tracing the watercourse as it travels downhill to the Bay and Pacific Ocean.

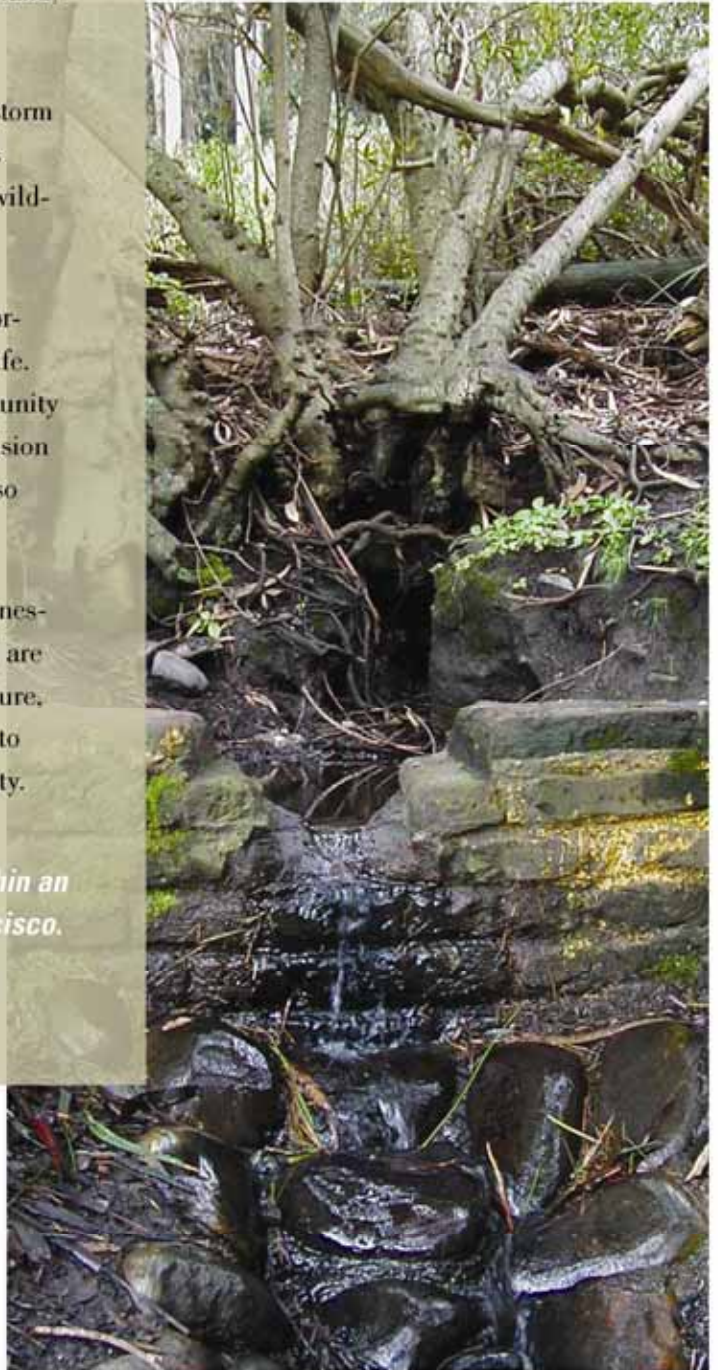
Along the way, legacies of the past—an old brick bridge, historic dams, an adobe site occupied two centuries ago by colonial families—tell the story of this water, this land, and the many lives that have shaped it.

Though mainly hidden today beneath roadways and storm drains, the flow of the creek persists. The small areas where it surfaces support some of the most valuable wildlife habitat in San Francisco.

The watershed is framed by historic Presidio neighborhoods and serves as a home to both people and wildlife. Its forests, trails and playgrounds welcome the community and provide respite from the urban landscape. Our vision is to revitalize, interpret, and care for the watershed so that future generations can also enjoy it.

Restored with the help of community volunteers, Tennessee Hollow is envisioned as a vibrant place where all are welcome. A place where children can experience nature, learn about history, or simply play outdoors. A place to find solitude or explore the beginnings of our great city.

Now imagine being able to experience all of this within an afternoon hike a few miles from downtown San Francisco. Imagine the Tennessee Hollow Watershed.



Summary

On August 10, 2007, the Presidio Trust (the Trust) released the Tennessee Hollow Upper Watershed Revitalization Project Environmental Assessment (EA), seeking public review and comment. On October 9, 2007 the public comment period closed. This document summarizes the public comment process, issues raised, and the Trust's responses. It also presents minor corrections and modifications to the EA document, and the final Finding of No Significant Impact (FONSI), and contains the following sections:

1.0 PUBLIC COMMENTS

2.0 ERRATA SHEET

3.0 FINAL FONSI

Upon signing the FONSI, the Trust will conclude the project's required environmental review under the National Environmental Policy Act (NEPA).

Thanks to all who participated and contributed to the planning and environmental review process.

1.0 Public Comments

1.1 NOTICES & OPPORTUNITIES FOR PUBLIC REVIEW

After several years of planning and extensive public input, the Presidio Trust released the Tennessee Hollow Upper Watershed Revitalization Project EA on August 10, 2007 (see EA, Chapter 5). The availability of the EA was announced in the following ways:

- Direct mailing to approximately 1,000 individuals and organizations who had previously expressed an interest in the project
- A notice in the Presidio newsletter, *At The Presidio*, which has a mailing list of approximately 15,000 individuals and organizations interested in the Presidio
- An announcement in a Presidio Trust Press Release
- Postings on the Presidio Trust website (both the availability of the EA and the EA document itself)
- Distribution at the state level via the California Governor's Office of Planning & Research, State Clearinghouse
- Distribution of the EA to local libraries and maintained in the Presidio Trust Library

During the three-month comment period, the Trust accepted written comments and offered opportunities for the public to engage and discuss the project including:

- Three guided hiking tours of the project area (September 13, 22 and 25)
- Public Meeting (October 2) to accept verbal comments on the EA

1.2 SUMMARY OF PUBLIC COMMENTS & TRUST RESPONSES

In total, nearly 1,500 letters, faxes, e-mails, and verbal comments on the Tennessee Hollow Upper Watershed Revitalization EA were received by the Trust. A summary of comments raised and the Trust's responses are presented below. A complete set of public comments letters and testimony is on file at the Presidio Trust Library, 34 Graham Street, San Francisco, 94129.

It is clear from the volume and content of the comments received that this project is of great public interest. The Trust appreciates the long-standing interest and involvement by the community and hopes that the community will support implementation and future project phases.

SOURCE OF PUBLIC COMMENTS	
Agencies	
2	National Park Service (NPS) State of California, Governor’s Office of Planning and Research
Organizations	
9	Department of Anthropology, Stanford University Earth Island Institute Nature in the City Neighborhood Associations for Presidio Planning (NAPP) Parents Association, San Francisco University High School Presidio Environmental Council Presidio Historical Association Presidio Heights Association of Neighbors (PHAN) Urban Watershed Project
Individuals	
1,419	The majority of letters were submitted by individuals as part of letter writing campaigns initiated by various organizations, including the Vikings Soccer League and the Natural Resources Defense Council. Of the 1,419 submitted letters, the bulk fall into two primary categories: 835 – Expressed strong support for youth recreation and advocate for the Trust to maintain or increase the number of playing fields. Of this group, approximately 74% (615 individuals) additionally urged the Trust to consider relocating Morton Field to Pop Hicks. 565 – Supported Alternative 2, but asked the Trust to remove rather than cap Landfill E.
38	In addition to letters and e-mails, 38 people provided verbal comments at the October 2, 2007 public meeting on the EA.
1,468	Total Comments

Public input has informed and helped shape the project. In response to the public comments on the EA, several changes have been made to the Trust’s Preferred Alternative as well as to the EA document itself. The basis for these changes is described in this section, and the modifications are outlined in Section 2.0 (Errata Sheet).

In general, public comments have been summarized and organized under three broad categories.

- **Environmental Issues**

These comments address the environmental effects of the project and specific sections in the EA, as well as questions regarding the NEPA review process and consultation with other agencies and organizations.

- **Alternatives & General Comments**

These comments include public opinions and suggestions regarding the project, alternatives, and specific elements of the project, such as interpretation. Other issues captured under this heading include questions about the Trust policies and practices. Most of the public comments received fall under this heading, including substantial input regarding playing fields.

- **Detailed Edits/Comments**

These comments address typographical errors, detailed comments, or requests for clarification. In general these comments were raised by one individual or organization and are very specific in nature.

Several comments touch on issues that span all three categories or raise inter-related issues. In these instances, cross-references to other relevant comments and responses are provided.

1.3 ENVIRONMENTAL ISSUES

COMMENT: Julius Kahn – Impacts of Parking & Circulation Options

Several commentors, including various organizations, expressed concerns regarding the size and location of the proposed parking lot at Julius Kahn. Some request that the Trust justify and explain the size of the lot; others recommend the lot be carefully designed to ensure the character of the historic forest is not adversely affected. Opposition was expressed to the circulation variant analyzed under Alternative 2 that proposes conversion of the West Pacific to a multi-use trail. The opposition to this variant appears to be primarily based on three actors — its potential effect on the cultural landscape, spillover traffic effects in nearby neighborhoods, and concerns regarding ADA access. Various suggestions were made to address these concerns, including reducing the size of the parking lot, maintaining on-street parking, and alternate circulation options such as converting the road to one-way circulation rather than a multi-use trail. The National Park Service stated that it concurs with the Trust’s National Historic Preservation Act finding of no adverse effect with certain provisions, expressing concerns regarding the treatment of the historic forest and proposed parking lot. One commentor identified beneficial effects of removing parking from the historic wall along West Pacific, but indicated that the EA should also include specific proposals for the preservation and rehabilitation of the historic wall if the parking is removed.

RESPONSE: In response to public comment, the Trust has made several modifications to the Preferred Alternative. A summary of these changes is provided below (also see Chapter 3, Final FONSI).

Modifications to Trust’s Preferred Alternative:

- The circulation variant proposing the conversion of West Pacific to a multi-use trail will not be carried forward as part of the Preferred Alternative. Vehicle access will be maintained along West Pacific Avenue, although the Trust will continue to explore opportunities to slow traffic and improve pedestrian access and safety in and around the playground, including the commentors’ suggestion regarding one-way vehicle circulation with parallel parking on both sides of the roadway.

- With respect to the proposed parking lot, the following changes will be made as part of the Trust’s Preferred Alternative. Maintaining vehicle access along West Pacific Avenue will allow on-street parking to continue, thereby eliminating the need to accommodate all vehicle parking in one consolidated lot. As a result, the Trust anticipates a substantial reduction (i.e., by half) or complete elimination of the need for the proposed lot depending upon the refinement of on-street parking efficiencies and pedestrian safety enhancements (as described above). The size of the lot will be as small as possible, and will be subject to the site-specific mitigation measures set forth in the EA.

Regarding commentors’ request for clarification regarding the size and justification for the proposed lot, the following clarification and background information are provided. As described in Sections 4.8.1.3 and 4.8.2.1, approximately 60 informal spaces are currently along the southern edge of West Pacific Avenue. The demand for these spaces is high. The diagonally parked cars can cause inadvertent damage to the historic wall, protrude into the roadway, and most important leave no space for a safe pedestrian connection to the playground. A parking lot along the northern, playground side of the street is one option to facilitate safe pedestrian movement to and from playground activity areas.

Under the predicted average peak field use conditions (i.e., two simultaneous little league games), Alternative 2 may generate an increase in local parking demand of approximately 50 spaces. The proposed project attempts to not only accommodate this future demand, but also to address existing pedestrian access and safety issues. The lot proposed under Alternative 2 was sized to accommodate 110 spaces, which would meet projected demand. As previously explained, the Trust is no longer considering a single lot to address parking demand for the entire playground. The Trust instead will rely on a combination of a small lot supplemented by on-street parking. This approach will maximize flexibility in meeting peak and seasonal fluctuations, as on-street parking can be informally expanded and contracted without the required infrastructure of a parking lot. (Also see “Parking & Traffic (General)” response to comment.)

With respect to the historic wall, the Trust concurs that removal of the parking lot and/or an alternative parking layout that is protective of the wall would be beneficial. The commentor’s suggestion that the Trust develop plans to rehabilitate the wall is also noted.

COMMENT: Julius Kahn – Impact of Field Upgrade

Julius Kahn Playground is a contributing feature of the Presidio National Historic Landmark District (NHLD). Several commentors expressed concern that the proposed changes may affect the cultural landscape and historic setting, and requested more information about the effect, including the conversion to synthetic turf. Others expressed concern that upgrade of the field with synthetic turf would displace existing, informal use of the field by families and small groups. A few commentors noted that expansion of the field to the east would require the removal of willow trees and suggest that restoration of rare dune gilia in areas near the pygmy forest and removal of non-native trees from other locations be considered to offset this loss. One commentor asked that the EA spell out the management responsibilities for Julius Kahn Field.

RESPONSE: As described in the EA and corresponding draft Cultural Landscape Report (CLR), the playing field at Julius Kahn has grown in size throughout the Presidio’s period of significance. What has remained constant has been its use as a playfield, the level topography, and the open character of the space. Consistent with the *Secretary of the Interior’s Standards for Rehabilitation*, the slight expansion of the play surface

will retain the open character, topography, and the setting and feeling of the original space. With respect to the surface treatment of the deteriorated turf lawn, a new material, synthetic turf, was identified for potential use at Julius Kahn as well as other sites within the Presidio. In response to public concerns, this issue was further considered during the National Historic Preservation Act (NHPA) compliance process.

Recent advances in synthetic turf technology have vastly improved the “natural” appearance, look, and feel of synthetic turf. Given the historic character of the Presidio, however, certain landscapes are more sensitive to alteration than others and the use of synthetic turf must be carefully considered. As part of the NHPA review process for this project, the Trust, in consultation with the NPS, California State Office of Historic Preservation, and Advisory Council on Historic Preservation, evaluated and discussed various site-specific considerations. Through the NHPA process, it was determined that while use of synthetic turf would not pose an adverse effect at more sheltered or non-historic sites such as Pop Hicks and Paul Goode fields, that its use at Julius Kahn would in fact result in an adverse effect – something the Trust seeks to avoid. In particular, the historic, park-like (naturalistic) setting of Julius Kahn at the edge of the Presidio surrounded by forest, and the introduction of synthetic turf and associated infrastructure (e.g., fencing, concrete edge/curb encircling field) would substantively alter, and be incongruous with the setting.

Commentors correctly noted that the conversion to synthetic turf will change the nature and use of the field. Today, the field serves many functions — from scheduled team use to informal, unscheduled activities common in urban green spaces such as picnicking, outdoor play, reading, and sunning. In fact, this field more than any other in the Presidio, is frequently enjoyed for this type of informal recreation. Conversion to synthetic turf would reduce if not eliminate these activities. Based on the anticipated impact to the historic character of the area, as well as community concerns, the Trust has determined that it will not pursue conversion to synthetic turf in this location. That said, however, the Trust believes there are still substantial opportunities to upgrade and improve the field conditions at Julius Kahn as described under Alternative 2. The proposed expansion of the field footprint will increase the flexibility of its use and allow it to be used for high school soccer. This type of field is significantly limited in the City. (Increasing field flexibility was specifically noted by the public as a priority during recent public workshops.) In addition, upgrading the current field surface with new grass turf would substantially improve the quality and safety of play, also a stated community desire, while preserving opportunities for informal recreational enjoyment. These enhancements would also improve the appearance of the field in a manner that is consistent with its historic setting. (Also refer to “Synthetic Turf” and “Morton Replacement” response to comment.)

The removal of several willow trees from the Landscape Vegetation Zone to accommodate field expansion would be offset by the project’s creation and enhancement of more than 20 acres of habitat. Commentors’ suggestions regarding native plant restoration outside the project area, within the historic forest, are noted. The *Presidio Vegetation Management Plan* (VMP) makes specific provisions for the Trust and NPS to consider understory diversification with native species in certain areas of the historic forest, provided that these activities do not affect the character of the historic forest. These actions may be considered as part of future vegetation management efforts; however, they are beyond the scope of this project.

With respect to management responsibilities for the field, although this is not an environmental issue, the EA notes on page 3-10 that Julius Kahn is managed by the San Francisco Recreation and Parks Department and that the Trust will continue to coordinate with the City regarding improvements to the field.

COMMENT: Parking & Traffic (General)

Relocating parking from riparian areas to upland areas received support; however, some commentors expressed concern that any parking in the watershed would reduce groundwater recharge and introduce automobile-related contaminants. Commentors encouraged the Trust to design parking areas with these potential effects in mind, including use of best management practices, permeable pavement, etc. One commentor urged the Trust to design new parking lots to accommodate average, rather than peak demand. One commentor and the National Park Service specifically requested clarification regarding the number of existing and future parking spaces, and how these changes relate to the Trust's Transportation Demand Management (TDM) Program and PTMP commitment to reduce parking spaces and private automobile trips into the Presidio.

RESPONSE: As described in Table A-1, mitigation measures NR-19, UT-7, NR-15, and NR-6, the Trust will use best management practices in designing all new parking areas to ensure that groundwater and surface water resources are protected. As described below, the Trust anticipates a net reduction in the total parking area within the watershed. With respect to sizing parking lots, the following clarification is provided.

In areas of the park that have a variety of parking demands within a small area (e.g., Main Post), parking supply is usually designed to meet the average demand during the peak period (e.g., midday weekday or weekend). Under this scenario, demands that peak at different times can use the same parking areas, thus reducing the footprint and total number of parking spaces in the park. In the project area, however, there is not a wide variety of demand. Most demand comes from outdoor recreation (e.g., trailheads, athletic fields, playgrounds) and residential uses, both of which have similar peak hours. The simultaneous nature of peak demands in this area limits the amount of surplus parking available to help offset peak use periods. Therefore, where parking lots are provided in the project area, the Trust seeks to ensure they are designed to meet the demand during average peak conditions, but are not oversized to the extent that visitors would be encouraged to drive. The Trust will not strive to accommodate demand associated with non-typical conditions such as large special events. (Also see "Julius Kahn – Impacts of Parking and Circulation Options" response to comment.)

With respect to questions regarding the Trust's TDM Program and its relationship to the proposed project, the following information is provided. Additional information can be found in Appendix D of the PTMP or the Presidio Trust website at www.presidio.gov. The Trust's TDM Program is focused on reducing the overall reliance on automobiles by encouraging alternatives such as walking, biking, carpool/vanpools, and transit. The Trust requires that all Presidio (Area B) tenants and residents participate in the program. A variety of incentives (i.e., free PresidiGo shuttle and new trails) and disincentives (i.e., permit parking areas and paid parking) are in place, and the Trust will continue to phase in these measures. The effect of TDM measures would be similar across alternatives. Both Alternative 1 and 2 maintain playfield activity closer to the Presidio's southern boundary and within park residential neighborhoods, therefore making these fields more accessible by foot or bicycle for many San Francisco and Presidio residents.

The commentor correctly notes that the PTMP calls for an overall net reduction in the parking spaces in the Presidio. The Trust anticipates that this will be achieved in the watershed over time primarily as residential (non-historic) housing units are removed and the creek is restored. In response to the commentor's inquiry

about the net changes in parking resulting from the proposed project compared to existing conditions, the following summary table is provided.

PARKING SUPPLY COMPARISON			
Location	No Action/Existing¹	Alternative 1	Alternative 2
Pop Hicks Fields	142	30	40
Morton Field	20	0	0
Julius Kahn	60	60	110
Paul Goode Field	38	72	50
El Polín Area	26	18 ²	18 ²
Buildings to Be Demolished (Bldgs. 770 & 777)		-8	-14
Subtotal	286	172	204
East Housing District	1,095	981	1,013
Net Change Project Area (District)	0% (0%)	-40% (-10%)	-29% (-7%)

¹ Existing space counts are based on the PTMP inventory of existing parking.

² Parking supply would be reduced by 8 spaces to reflect the 8-space reduction in demand. The remaining 18 spaces it would be reorganized slightly to accommodate proposed enhancements (see Section 4.8.2.2).

As shown in the above table, there would be a net reduction in parking spaces within the project area under both action alternatives. While this reduction is minimal within the larger context of the Presidio, it is beneficial and consistent with the spirit and intent of the Trust’s TDM Program.

COMMENT: Synthetic Turf

Comments regarding synthetic turf were mixed. Many letters strongly supported the use of synthetic turf as a way to increase playtime and flexibility. Supporters of synthetic turf also noted the positive attributes of decreasing the park’s use of water, pesticides, and fertilizers. In contrast, a number of other commentors urged the Trust to further evaluate the impact of synthetic turf on the natural environment. The central concern pertains to the effect of runoff and leaching on water quality. Commentors asked the Trust to monitor a variety of factors, including water runoff from both synthetic and natural surfaces. One commentor expressed concern regarding the potential water quality effects of maintenance products that are used on synthetic fields such as fabric softener (used to reduce static). Other issues raised include the effect of synthetic turf on wildlife and climate change. The National Park Service (NPS) expressed concern about a potential increase in traffic, parking, and associated effects from increased playtime. The NPS also suggested that the Trust study the life cycle and maintenance costs of synthetic turf.

RESPONSE: Synthetic turf fields are being employed throughout the world and have gained in popularity as the materials used have improved. Sporting communities as well as cities have largely applauded these developments and embraced synthetic turf. New York City, for example, has installed dozens of synthetic turf fields since the late 1990s and plans to install many more in the coming years. Nevertheless, although cities are building more and more synthetic fields, there is a growing constituency that questions the environmental safety of synthetic turf products.

Modern synthetic turf surfaces use a combination of rubber granules (from recycled tires) and sand. Both the treatment of the rubber as well as the proportion of rubber to sand varies among manufacturers. The water quality issues raised by the public are due to the possibility that toxic materials (primarily metals and plastics) would be leached from the rubber granules. In response to public comments, the Trust reviewed a variety of pertinent studies and interviewed land managers, industry representatives, and academics.

One Swedish study found that synthetic turf containing recycled rubber “may give rise to local environmental risks” and indicated that chemicals leaching from turf may lead to concentrations in surface water that exceed some of the European standards for surface water guidelines for zinc, lead, and copper. A report prepared for the California Office of Environmental Health Hazards Assessment found that “groundwater in contact with *tire shreds* contained elevated levels of chemicals,” but the study goes on to conclude that it is “unlikely” that the concentration of chemicals leached from synthetic turf would reach toxic levels. The University of Maine prepared a review of literature for the U.S. Environmental Protection Agency on the effects on water quality of tire aggregate (in a landscape, but not synthetic turf application). The author, Dr. Dana Humphrey, concluded that tire-derived leachate placed above the water table has negligible toxic effect for fresh water aquatic organisms. Planners from the Seattle area conducted a study in which they found that “artificial sports fields that utilize a crumb rubber and sand mixture containing 60% or more sand (by weight) do not leach zinc in quantities that exceed state water quality standards.” This determination has become the basis for what appears to be a de facto standard in King County, Washington. New fields must either meet the required standard or provide stormwater-quality treatment systems.

Overall, the research suggests that the impact of synthetic turf on the environment is currently inconclusive. The Trust was unable to find any empirical data from a U.S. government source that specifically examines synthetic turf, and the federal government has provided no guidelines. Additionally, the Trust was unable to find a domestic third-party source that has conducted studies of synthetic turf’s impact on water quality. To date, cities, school districts, and professional clubs from San Francisco to New York have concluded that synthetic turf is environmentally acceptable. In view of the above, the Trust will continue to monitor research and advances in synthetic turf, and will consider development of standards for use in the Presidio.

The subject of effects of synthetic turf on wildlife was considered in Section 4.4 of the EA. The Trust concluded that while the use of synthetic turf would reduce the presence of soil organisms and other food sources that may be used by wildlife, the size of the fields in the context of the watershed was small and would be more than offset by the substantial habitat benefits provided by the project. Similarly, a reduction in photosynthetic capacity of synthetic turf, as suggested by one commentor, would be small given the context and would likely be offset by the project’s reduction in impervious surfaces through the conversion of roadways to trails, building removal, and parking consolidation.

The traffic associated with increased use of fields in the park would comprise a negligible percentage of the overall increase in traffic expected in the future. Moreover, the traffic generated by playing fields, particularly for games when traffic generation is greatest, would not coincide with peak commute periods when overall traffic conditions in the park are expected to be most congested. Strategies such as improved maintenance or synthetic turf that allow for increased playtime would simply allow predicted traffic conditions to occur more days of the year, depending upon weather conditions. With respect to life cycle and maintenance costs, the Trust notes the NPS’s suggestion and will consider these factors.

COMMENT: Dogs & Cats

Many commentors expressed concerns about the impact dogs may have on resources and the visitor experience in the watershed. In particular, commentors noted that “large packs of off-leash dogs” disrupt other park visitors and that the lack of cleanup not only harms habitat and historic resources, but also degrades water quality. Many requested that the leash law be enforced in the Presidio; others recommended that either “dog-free” zones be established within the watershed and adjacent to restoration areas and sensitive habitats, or that dogs be prohibited from the watershed altogether. A few commentors urged the Trust to consider residential lease requirements that include enforceable “cats-indoor” policies as well as a plan to control feral cats. Some commentors stated that dogwalking is a recreational use and expressed concern this use may be impacted by restoration activities. (Also see “Recreation/Public Use” response to comment.)

RESPONSE: None of the proposed alternatives recommends or implies a change in rules and regulations that govern dog and pet management at the Presidio. According to the regulations for Area B of the Presidio, dogs are required to be on-leash, and pet owners must clean up after their pets. The rules and regulations governing dog and pet management have been variously interpreted over time and a long-standing practice of allowing dogs off leash has created confusion about the rules and regulations.

At this time, the National Park Service is engaged in a rulemaking process to clarify pet management rules and regulations for the broader Golden Gate National Recreation Area (GGNRA), including Area A of the Presidio. Once the GGNRA process is concluded, the Trust may consider undertaking its own rulemaking, either to clarify or change dog management rules and regulations.

With respect to questions about why the Trust does or does not enforce existing rules and regulations, the Trust is not a law-enforcement agency and has no control over how, when, or whether laws are enforced. Although the leash laws have been challenged throughout the GGNRA and citations have not held up in court, United States Park Police (USPP) will cite dog owners when off-leash dogs threaten people, property, or resources.

To the extent possible, the Trust removes feral cat feeding stations from the park. The commentor’s suggestions regarding feral cats are noted. The Trust’s pet policy stipulates that permission to keep a pet is granted at the discretion of the Presidio Trust. In neighborhoods where pets are allowed, including those in the Tennessee Hollow area, the policy limits the number of pets to one per household and further requires that cats be kept indoors. The commentor’s suggestion that the Trust consider a no-pet policy in the future should conditions warrant it, is noted.

COMMENT: Landfill 2, Landfill E, and Figure 1.3 (Phasing)

There were concerns and questions about why Landfill 2 was not identified as a “phase” on Figure 1.3 in the EA. Several commentors requested that the Landfill 2 be included in the scope of the EA; others stressed that Landfill 2 should be cleaned up simultaneously with Fill Site 1 to achieve economies of scale, increase efficiencies, and minimize disturbances. The National Park Service echoed these comments, and stated specifically that remediation activities should be “conducted concurrent with remediation of Fill Site 1...” and

that the Trust should consider what type of native plant restoration will occur in this area and whether this would affect the *Presidio Vegetation Management Plan* (VMP) boundaries. Other commentors suggested that the Landfill E/Pop Hicks site be removed from the EA and that Landfill 2 be substituted in its place.

RESPONSE: As described in Section 1.2 of the EA, Figure 1.3 is intended to convey the Trust’s current thinking regarding phasing within the broader watershed. This figure was included in the EA in response to public requests for such a graphic. The figure brackets the areas along the creek zone, indicating whether they are considered other near-term, mid-term, or long-term activities. The upland areas of the watershed are more broadly addressed with arrows indicating that native plant restoration and historic forest rehabilitation activities are ongoing throughout the watershed and will continue until the VMP is fully implemented.

Commentors correctly note that Landfill 2 is located along the edge of a seasonal drainage which is in fact part of the creek system. For consistency purposes, Figure 1.3 will be modified as shown in Section 2.0 (Errata) to indicate that Landfill 2 is considered an “other near” term activity. Landfill 2 is scheduled for remediation in 2011/2012 as part of the Presidio Remediation Program, and is scheduled to occur sequentially with the remediation of nearby Fill Site 1, as recommended by commentors. Following remediation, Landfill 2 will be revegetated consistent with the adopted VMP. The remediation planning is subject to its own regulatory and public review process, and post-remediation revegetation of the site will be done consistent with the VMP.

The Trust included the Pop Hicks/Landfill E site within the scope of the EA because the Trust is proposing site-specific modifications, such as conversion of a historic road to a multi-use trail, to maximize habitat benefits while accommodating the designated land use (active recreation). The public has expressed interest in this site, and by including these site-specific modifications in the EA, the Trust hoped to provide additional opportunities for public input. (Please refer to “Landfill E Remediation Options” and “Land Use – Pop Hicks Field” responses to comments for additional information.)

COMMENT: Other Figure 1.3 Comments

The following additional questions or comments were raised regarding Figure 1.3: (1) A few commentors asked why the creek “alignment” shown at the YMCA site does not correspond to existing creek alignment; (2) One commentor suggested that the green arrows in the upper watershed (indicating “ongoing restoration”) are inaccurate as they point to areas where invasive non-native plants persist within the areas designated as “native plant communities”; and (3) One commentor recommended the area directly southeast of Barnard Avenue at “the confluence” be changed to “native plant communities.”

RESPONSE: Figure 1.3 uses the VMP zones as its base map. The VMP is a 50-year management plan that is in the process of being implemented. The VMP designates three vegetation zones within the Presidio (landscape vegetation, historic forest, and native plant communities) and provides guidance for the treatment and management of vegetation within these zones. The VMP makes provisions for the future restoration of the creek system in Tennessee Hollow as well as the upland areas of the watershed. As shown in Figure 1.3, the watershed also contains stands of historic forest that will be rehabilitated and protected, and landscape vegetation which includes residential areas and associated historic landscapes, playing fields and playgrounds, and other landscape features.

The “creek alignment” indicated at the YMCA site corresponds with the native plant zone designated in the VMP. This general alignment reflects the VMP’s assumed post-restoration path of the creek. As indicated on the figure, a precise design for the site will be developed as part of future planning. Commentors correctly note that the current alignment of the creek (storm drain) differs from the native plant zone. At present, the storm drain containing the creek passes under Presidio Boulevard and veers northwest where it passes in a diagonal line beneath the YMCA parking lot.

With respect to the second comment, the arrows in the upland areas of the watershed are intended to indicate that these areas are subject to *ongoing* activities (see key in Figure 1.3). The commentor is correct that restoration work has not been completed, and nonnative, invasive plants persist in areas zoned for future native plant restoration. The areas where restoration, or in the case of the historic forest, rehabilitation, has already occurred are indicated on Figure 1.3.

The suggestion that the boundaries of the native plant zone be modified near Barnard Avenue is noted. These zones were not developed as part of this planning effort, but rather were established in the VMP.

COMMENT: Conversion of Morton Street to a Trail

The Presidio Historical Association expressed concerns regarding the conversion of Morton Street to a multi-use trail, and encouraged the Trust to ensure monitoring and compliance with mitigation measure THCL-B to minimize the effect.

RESPONSE: The Trust will ensure that mitigation measure THCL-B is implemented and that the historic character of this contributing feature is preserved. Since release of the EA, additional information regarding the appearance of the roadway at the end of the period of significance was identified in the *Draft Tennessee Hollow Cultural Landscape Report* (CLR). As described in the Draft CLR, the roadway was constructed in 1942. Today it is paved with asphalt, but judging from historic aerials, Morton Street’s surface appeared to be graded earth as late as 1948. With the change in surface materials, the road’s modern alignment is less curvilinear than it was during the period of significance. The treatment recommendation for Morton Street is to convert it into a multi-use trail and rehabilitate the curving historic alignment that existed during the period of significance. Mitigation measure THCL-B has been updated to reflect these treatment recommendations (see Table 1 in the Final FONSI).

COMMENT: Recreation/Public Use

Various individuals encouraged the Trust to support a wide variety of recreational uses from walking, skating, biking, and other active sports to birdwatching, art, photography, hiking, stewardship and “peace-seekers.” Concern was expressed that some of these uses do not have organizational representation and thus may be overlooked. One individual stated that visitor experience and recreational resources should be analyzed in the EA indicating that “proposed modifications that go beyond PTMP...” with a specific reference to “...a net increase in ball fields and changes in recreational uses.” Some individuals identified dog walking as important recreational use. One commentor noted that Pop Hicks Field is being used by dog walkers and that the EA should evaluate the impact on dog walking of rehabilitating Pop Hicks Field for recreation. One commentor presented photographs and observations of visitor use during a Sunday afternoon at Morton and Julius Kahn

Fields and the recently restored creek at Thompson Hollow. The commentor noted that the use levels were higher at the two fields and suggests that creek restoration appears “inconsistent with the Trust’s stated mission “to preserve the Presidio as an enduring resource for the American public,” noting that existing fields play an important role in drawing people to the area and should not be removed to create less frequently used creek areas.

RESPONSE: As discussed under the “Trust Policies Regarding Recreation” response under Playing Fields, the PTMP directs the Trust to provide a wide range of recreational activities from passive to active uses, including those specified by commentors. The proposed project seeks to implement the PTMP in the upper watershed area, and would provide a wide variety of recreational opportunities. Providing diverse opportunities for public use and enjoyment is in fact is one of the stated objectives of the project (reference Chapter 2, Purpose & Need in the EA).

The enhancement of existing fields, removal of one field, and rehabilitation of Pop Hicks Field are all consistent with the PTMP and adopted Trust policies — as are the expansion of hiking trails, improvement of picnic areas and new opportunities for stewardship. The EA tiers from the PTMP EIS, which considered effects on recreation and visitor enjoyment. The Trust has determined that no additional analysis of these subjects is needed.

None of the proposed alternatives is recommending a change in dog management at the Presidio. (Also see “Dogs & Cats” response to comment.)

The Trust appreciates the level of detail and documentation that went into the commentor’s comparison of visitor use between the two fields and the restoration area. The Trust recognizes that the park’s playing fields serve the community. As described in Chapter 2 of the EA, the project seeks to maintain active recreation as well as restore the creek and promote a broad range of other recreational uses consistent with the PTMP.

COMMENT: Purpose & Need

The National Park Service noted that the EA, page 2-3 (Purpose & Need), references the Presidio Trust Board of Director’s guidance regarding playing fields, and requests that the EA be amended to include the complete text of these guidelines.

RESPONSE: The referenced guidance was provided by the Trust Board as part of the recent public planning process related to Presidio-wide playing fields. The full text is presented on the Trust website (www.presidio.gov – see Major Projects, Playing Fields) and is reproduced below:

- Maintain or slightly increase the current number of playing fields (recognizing that some fields may need to be relocated to achieve other park objectives).
- Locate any new fields in appropriate places that minimize park traffic and ecological disruption, maximize operational efficiency, preserve the Presidio’s historic character, and protect culturally sensitive areas.

The EA alternatives were developed consistent with this guidance, as well as policy guidance from PTMP, the *Presidio Vegetation Management Plan* and the *Presidio Trails & Bikeways Master Plan*.

COMMENT: El Polín – Archaeology

Concern was expressed about potential impacts to archaeological resources associated with the proposed creek restoration, interpretive garden, and public restroom/parking construction in the El Polín area.

RESPONSE: The Presidio Trust recognizes the potential for impacts to archaeological resources in the El Polín area, and will avoid or minimize adverse effects to archaeological resources throughout the course of the Tennessee Hollow Upper Watershed Revitalization Project. The Trust will also continue its partnership with Stanford University to conduct research and public interpretation of the archaeological resources in the El Polín area.

For the purposes of the proposed project, the Trust will develop a research design and treatment plan for areas to be affected by ground disturbances as identified in the EA, which will be further specified in engineering and construction documents for the creek, garden, and restroom/parking area. These plans will include measures to identify, assess, and treat resources prior to construction as well as monitoring and discovery plans for use during construction activities. All of these actions will be carried out in accordance with the Programmatic Agreement and mitigation measures CR-8 through CR-15, as outlined in Appendix A of the Draft FONSI.

COMMENT: El Polín – Cultural Landscape

A request was made for more information regarding the period of significance at the El Polín Spring area and clarification about whether the new elements proposed would be consistent with the draft Cultural Landscape Report (CLR) treatment recommendations. The commentor also questioned whether the new features proposed for the site would “further confuse the visitor as to an understanding of the site’s history and contributing resources.”

RESPONSE: El Polín Springs has features from both the beginning and the end of the period of significance of the Presidio. Recently discovered archaeological remains from either the Spanish or Mexican periods are right next to landscape features developed by the U.S. Army in the 1930s. The proposed rehabilitation of the El Polín Springs area would allow visitors to see and interpret this space as both an early homestead and as an open landscaped area adjacent to military housing on the cusp of World War II. The proposed garden area will be developed not as a re-creation of a known historic feature but rather as a way to reference and acknowledge the early agricultural use of the site and reinforce the importance of water in this site’s history. This combined with the preservation of listed landscape features from the American period will result in an open landscape area meant for passive recreational use, which is consistent with the space as it existed at the end of the period of significance.

The proposed project is intended to be consistent with the CLR and to carry out its recommendations. The commentor correctly notes that some of the treatment recommendations listed in the draft CLR were not fully identified in the EA. The EA mitigation measures will be amended to ensure consistency with the draft CLR treatment recommendations (see Table 1 in the Final FONSI).

COMMENT: El Polín – Parking Information

Two commentors ask the Trust to indicate where parking relocated from the south end of MacArthur would be replaced.

RESPONSE: Existing residential parking spaces currently near El Polín Springs would be relocated north along MacArthur Avenue between residential Buildings 857 and 859, as described in Section 4.8 of the EA. The relocated spaces would be accommodated by extending existing perpendicular street parking in this area. Visitor parking would be provided near the entrance to the site, as indicated on Figure 3.2. The precise design of this parking would be subject to future archaeological investigations at the site (see “El Polín – Archaeology” response to comment).

COMMENT: El Polín – Interpretation & Recommendations for Enhancements

There was broad support from resource experts, the preservation community, neighborhood groups, and environmental organizations for the interpretative concepts proposed in the EA. The Presidio Historical Association (PHA) specifically noted the importance of interpreting the evolution of the West Cantonment as it relates to the layout of the historic ridgetop neighborhoods present in the watershed today, and also strongly encouraged the Trust to clarify that the proposed boardwalk is not a reconstruction, but rather reflects a feature common in the West Cantonment during the period of significance. The PHA noted that the use of El Polín for passive recreation such as picnicking will provide an excellent opportunity to “educate the public on how the layers of history link together in this park.” A few commentors expressed concern about picnicking in this area, recommending the Trust consider moving the picnic tables to the north side of the interpretative garden “away from restoration areas,” make provisions to prevent the unintentional feeding of wildlife, and one commentor encouraged the Trust to consider moving picnicking to the Eastern Tributary and not to permit the area to be used as a special events venue, to “retain its contemplative feeling and quiet location.” One commentor requested that a nature trail be designated so that the plants indigenous people used can be studied, and that the Trust consider realigning the trail to discourage “cut through” from Julius Kahn to the Ecology Trail.

RESPONSE: The Trust appreciates the feedback and will incorporate these comments and suggestions as interpretative concepts and detailed designs for the site are developed. With respect to picnicking, the Trust intends that this area will continue in its current function as non-permitted picnicking as well as a venue for outdoor educational programs. With respect to the precise placement of the picnic tables, commentors’ suggestions are noted. Moving the picnic area to the north of the interpretative garden, however, would not increase the distance to the restored creek — it would in fact place it closer to the creek. Under all circumstances, the picnic facilities will be designed using wildlife-proof trash containers, signage and other measures to prevent inadvertent wildlife feeding. Precise placement and design of the picnic tables and garden will be informed by additional archaeological investigations in this area. (Also see “El Polín – Archaeology” response to comment.)

COMMENT: Bats

One commentor recommended that the Trust conduct pre-demolition bat surveys of housing units slated for removal, and if bats are found, consider future use of bat boxes in the restoration area.

RESPONSE: As described in mitigation measure NR-9, the Trust plans to conduct pre-demolition bat surveys. At the suggestion of the commentor, the Trust will explore the use and effectiveness of bat boxes with the bat biologist retained to conduct pre-demolition surveys, as warranted.

COMMENT: Himalayan Blackberry

One commentor noted that Himalayan blackberry, while nonnative and invasive, still provides food source and shelter for birds. The commentor recommended that if Himalayan blackberry is removed as part of future restoration activities, that native plant species be planted prior to its removal.

RESPONSE: The Trust concurs that minimizing the loss of shelter and food sources during habitat restoration is important. As described in mitigation measure NR-9, the Trust will plant fast growing species such as California blackberry and yellow bush lupine to quickly reestablish cover for wildlife, as well as phasing tree removal and other measures to minimize potential disturbances to wildlife. (Also see “Head Start Program for Trees” response to comment.)

COMMENT: “Head Start” Program for Trees

One commentor suggested that locations be identified throughout the watershed where native trees can be planted in the near future so that by the time their respective phases are implemented, they will be established.

RESPONSE: As described in mitigation measure NR-1, the Trust will seek to begin tree propagation several years before planting. Planting native saplings within the areas infested by nonnative species may prove problematic both in terms of the interim health of the saplings and also in future construction complications (i.e., effectively removing non-native species while protecting saplings). The Trust appreciates the suggestion, however, and will consider it as part of project implementation.

COMMENT: Clarkia Habitat

One commentor stated that the project would have a significant adverse effect on adjacent Presidio clarkia, a rare plant being restored in the upland areas of the watershed. The commentor specifically stated the opinion that daylighting the creek below the Inspiration Point will “drain” or otherwise lower the groundwater table in Inspiration Point and adversely impact Presidio clarkia. The commentor referenced Dr. Susan Harrison of U.C. Davis as an authority on the serpentine seep flora and infers that Dr. Harrison has expressed concern regarding the project.

RESPONSE: Section 4.4 of the EA acknowledges the presence of rare serpentine habitat (including Presidio clarkia) in areas adjacent to the project site, and identifies mitigation measures to ensure that

individual plants would not be disturbed during construction. With respect to the long-term implications of creek daylighting and the commentor’s assumptions regarding upland groundwater levels, the following clarification is provided.

The serpentine bedrock and thin soil veneer that support the Presidio clarkia in the steep headwater reaches above El Polín loop is a geologic and hydrologic system that is separate from the thick accumulation of Colma Formation sandstone that blankets the valley bottom. The rate and volume of water flow into, through, and out of the Inspiration Point serpentine bedrock is controlled by gravity and interconnected system of bedrock fractures. Much of the water in the serpentine bedrock beneath Inspiration Point discharges into the lower and downgradient Colma Formation sandstone along the south and western margins of El Polín loop. Proposed creek daylighting actions downstream (north) of El Polín loop will not affect the volume and rate of transmission of water from these upland areas. Thus, the project will not alter the existing Inspiration Point groundwater conditions and will not accelerate or adversely modify (i.e., drain) groundwater from Inspiration Point as suggested by the commentor.

Trust staff met with Dr. Harrison on site and discussed the project, and Dr. Harrison concurs with the Trust’s finding that the proposed project will not affect the serpentine grassland, including the Presidio clarkia.

COMMENT: Description of “Headwaters”

One commentor noted that the EA does not “adequately identify the ‘headwaters’ as the fractured serpentine formation supporting the rare plant community of *Clarkia franciscana*....”

RESPONSE: Section 4.3.1 and Figure 4.3-1 of the EA summarize the hydrologic characteristics of each tributary in the watershed, including a description of the headwaters and location of tributary divides. As stated in Section 4.3 (Water Resources), this information is supported by a collection of technical reports about the watershed conditions. These reports are incorporated by reference and are available for review in the Trust Library. With respect to the plant communities adjacent to the project area, Section 4.4 (Biological Resources) describes and maps the general location of nearby *Clarkia* habitat and analyzes the potential effect of the project on this rare and recently restored habitat area. (Also see “*Clarkia* Habitat” response to comment.)

COMMENT: Lack of Water

A few individuals questioned whether there is adequate water to achieve the proposed restoration plans; others questioned whether the project would have any environmental or ecological benefits. One commentor stated that the purpose of the project was to provide freshwater for Crissy Field Marsh and rejected this concept and its potential benefits. Another individual questioned whether a creek historically existed in the watershed.

RESPONSE: The EA acknowledges that Tennessee Hollow has a limited supply of water. The Trust took special care to ensure that an accurate understanding of existing and future water supplies was obtained as part of project planning. See Section 4.3 (page 4-14) in the EA for an overview of the scientific research, data

collection, and analysis that went into the development of the project. This information was critical in developing the project alternatives and was relied upon to ensure that the proposed habitat restoration plans are grounded in reality *and* will be sustainable over the long term.

Creek flows have never been, and will never be prolific in Tennessee Hollow. Nonetheless, the habitat values supported by these limited water supplies are substantial. These values are particularly significant given the watershed's location in the highly urbanized San Francisco peninsula where other opportunities for riparian and upland restoration are nonexistent or limited. They are also significant given the proximity of the creek system to upland areas of the Presidio, the Crissy Field Marsh and Bay, and the ability of the restored creek system to function as a corridor and oasis for wildlife — both resident and migratory species. The Presidio's location within the Pacific Flyway at the edge of one of the most biologically significant estuaries in the country, further underscores the regional and ecological significance of the project.

The purpose of the project is not to provide freshwater flows to Crissy Field Marsh. As described on page 4-20 of the EA, none of the project alternatives would have a material effect on the volume of freshwater discharged into the marsh. The project is, however, anticipated to improve the quality of the water entering the marsh.

With respect to the existence of a creek, historic maps, including those prepared by the Army in 1852, 1859, 1869, 1844, and 1915, were revised and found to clearly show the creek system in the watershed. These historic maps correspond with current geologic and hydrologic investigations. The type of creek, and more importantly the magnitude of the flows appear to be the underlying focus of the commentor's concerns and questions. As previously stated, the Trust concurs that the springs in the watershed have never been, and will never be, prolific water sources.

The year-round availability of freshwater at the Presidio, which includes the more abundant sources of Lobos Creek and Mountain Lake, as well as the smaller unnamed springs, El Polín and a freshwater pond near the former marsh (at Crissy Field), played an important role in the history and development of the Presidio. One of the commentors challenged this assertion and in particular cited various historic accounts of the Presidio. The following information is provided in response to these specific comments.

In reviewing the Menzies account of the water at the Presidio, their first stop appears to be at the west end of the marsh where they found “very good and wholesome” water at a pond behind the marsh. They moved east, closer to el Presidio at the recommendation of the Commandant, who assured them that the “Wooding & Watering” was nearly the same as the other end. The commentor correctly noted that they had a difficult time finding fresh water near the marsh at the east end. This accords with the current knowledge of the marsh, that it is a tidal marsh with very little fresh water input. The drainages in the Tennessee Hollow area were not known to be flowing creeks like Lobos Creek and are not expected to have high flows when revitalized. Creek restoration will, however, return water from storm drain lines to the groundwater basin and enhance habitats for plants and wildlife for visitors to enjoy.

COMMENT: Fill Disposal

One commentor requested more information about disposal plans for the proposed 40,000 cubic yards of material proposed for removal, noting that this issue is only analyzed in the Transportation Section of the EA.

RESPONSE: As described in Chapter 3, both alternatives propose the removal of 40,000 cubic yards of fill from the Morton Street Field site to daylight the underlying creek. Alternative 1 proposes to recycle and reuse a portion of the fill materials at nearby Fill Site 1 to accommodate the construction of a playing field at that site and minimize offsite truck trips. The remaining materials would be transported offsite for disposal at appropriate location. Alternative 2 proposes that all fill materials would be disposed of offsite. These assumptions are reflected in the transportation analysis as presented in Section 4.8. Other sections of the EA (i.e., noise, air quality, water resources, biological resources, archaeological resources, etc.) also consider the effects of associated earthmoving and grading activities.

COMMENT: Remnant Native Trees & VMP Management Policies

Multiple commentors recommended that remnant native trees, such as the mature buckeye located in the Eastern Tributary, be preserved and protected during restoration activities. One individual specifically noted several areas where remnant native plant assemblages occur within the landscape vegetation and historic forest zones, as designated in the adopted *Presidio Vegetation Management Plan* (VMP), and recommended that these areas be “conserved and sufficiently enhanced where appropriate.” The National Park Service urged the Trust to develop and implement strategies for watershed enhancement within the Landscape Vegetation Zone.

RESPONSE: The Trust concurs with the commentor’s suggestion and will seek to protect and preserve remnant native plant assemblages and trees within the proposed restoration areas as described in Section 4.4.3.2 of the EA and mitigation measure NR-1. With respect to native plant assemblages occurring beyond the project area within the historic forest and landscape vegetation zones, the Presidio VMP makes specific provisions to protect and enhance in these areas, including but not limited to the reintroduction of native trees and understory species in the historic forest and puts restrictions upon the use of invasive nonnative plants in ornamental plantings in the landscape vegetation zone. The VMP was prepared and adopted jointly by the National Park Service and the Presidio Trust to guide vegetation management activities throughout the Presidio, including the Tennessee Hollow Watershed.

COMMENT: Noise

The National Park Service stated that the EA does not include a discussion of noise “in relation to noise-sensitive areas” and asks what the expected effects of noise from “ball fields and other planned recreational uses in the watershed (e.g., hiking trails)” will be on visitors and residents.

RESPONSE: Section 4.7.1 of the EA identifies various uses that are considered to be more sensitive to ambient noise levels than others, including residential areas, parks, and other recreational areas. The NPS correctly notes that the PTMP EIS identifies El Polín and the watershed as noise-sensitive areas. The PTMP

EIS also identifies residential areas, such as East Housing, and outdoor recreational uses as noise-sensitive receptors. These uses were all considered in the analysis of potential noise increases that would occur as a result of the project. As described in the EA, the use of heavy equipment and trucks during construction has the potential to disrupt nearby sensitive uses, and mitigation will be implemented to ensure these effects are minimized. The Trust anticipates that over the long term creek restoration (which will include the associated removal of non-historic structures, conversion of roadways to trails) and the maintenance, or even slight increase, in existing outdoor recreational activities will not have a noticeable noise effect on park visitors or residents.

COMMENT: Mitigation Measure NR-15

The NPS requested that mitigation measure NR-15 be expanded to include water quality monitoring at Thompson Reach (as well as Crissy Field Marsh).

RESPONSE: The Trust concurs and will modify mitigation measure NR-15 accordingly (see Table 1 in the Final FONSI).

COMMENT: Morton Bridge

A commentor recommended that future designs for the bridge should carefully consider elevation so as to maximize riparian wildlife, noting that a low bridge over a narrow channel could be an impediment to wildlife movement.

RESPONSE: Precise designs for the proposed bridge will be reviewed within this context. As described in the EA, conversion of Morton Street to a trail and the use of a bridge rather than a pipeline or culvert at the creek crossing were specifically identified for their environmental benefits — maximizing habitat connectivity and the potential for wildlife movement within the newly established corridor.

COMMENT: Sanitary Sewers – Water Quality

One commentor strongly encouraged the Trust to “continuing monitoring and working with the City and County of San Francisco to repair and maintain all adjacent sewer lines” as a means to protect water quality.

RESPONSE: The Trust is responsible for the operation and maintenance of the majority of the sewer lines within the watershed. At present, the Trust inspects the manholes near the creek in Tennessee Hollow weekly to check for signs of backups, which can occur in older pipes like those found in the Presidio. In FY08 (which began October 1), the Trust plans to rehabilitate the manholes in the area near the creek zone, including the installation of lining and watertight lids to ensure that any potential backups do not overflow into the creek. With respect to the City and County of San Francisco, one City line crosses the Presidio in this area, near the top of Liggett Avenue. To the Trust’s knowledge, no operational or maintenance issues associated with this line have occurred in the past decade. If any issues occur, the Trust will work with the City and County of San Francisco to correct any deficiencies.

COMMENT: Cumulative Impacts

One commentor requested that additional information regarding newly proposed projects, such as the Museum at the Main Post, be incorporated into the discussion of cumulative effects. The commentor specifically noted the cumulative effects associated with construction traffic, as well as recreational effects of the displacement of a tennis court and removal of historic buildings.

RESPONSE: The cumulative analysis in the EA accounts for projects that were known at the time the EA was prepared. It also analyzes the impacts of activities either not anticipated by PTMP, or not sufficiently developed at that time to allow for comprehensive analysis, such as rehabilitation of the Main Parade, Doyle Drive, Presidio Trust Remediation Program, and other projects. Since release of the EA, additional information has come to light about projects occurring in the Main Post District. In particular, the commentor cited the proposed museum. Based upon existing knowledge of the proposed actions for the Main Post District, it is not anticipated that the cumulative impacts associated with these Main Post proposals, when combined with the mostly beneficial or neutral impacts of the Tennessee Hollow Upper Watershed Project, will result in any significant impacts to the Tennessee Hollow area of effect. The Trust is preparing a supplemental EIS (SEIS) for the Main Post in which it will consider and evaluate in detail the potential cumulative effects of additional Main Post projects on Tennessee Hollow, as well as on other districts in the Presidio. The effect of removing the tennis court and historic buildings will be analyzed in the upcoming SEIS.

COMMENT: Consultation and Coordination

Two commentors asked whether San Francisco Recreation & Park Department should be referenced in Chapter 5, Consultation and Coordination. One commentor inquired about consultation with Native American groups. The National Park Service requested that the American Indian Liaison be included in future discussions with Native American groups.

RESPONSE: Chapter 5 (Consultation and Coordination) will be revised to indicate that the Trust has and will continue to coordinate with the San Francisco Recreation & Park Department. As the EA stated in Section 3.2.1, the Trust plans to invite indigenous people and other interested groups to participate in the development of possible ethnobotanical or other interpretative concepts for the area. As requested, the Trust will invite the NPS American Indian Liaison to participate in future discussions with indigenous peoples.

COMMENT: Trust NEPA Process

One commentor questioned whether the Trust followed its NEPA regulations pertaining to public comment on the draft EA and FONSI.

RESPONSE: As outlined in the draft document, the EA and FONSI for the Tennessee Hollow Upper Watershed Revitalization Project were prepared in accordance with the Council on Environmental Quality (CEQ) regulations implementing NEPA. The Trust also followed its own regulations on environmental quality promulgated at 36 Code of Federal Regulations (CFR), Part 1010. With respect to public participation, neither the CEQ regulations nor the Trust NEPA regulations specify a particular period of time

associated with public comment on a draft EA. Nonetheless, the Trust sought public comment on the draft EA and FONSI over a 60-day period and also held a public meeting on the EA document. Following completion of the public comment period, the Trust reviewed and considered public input before making a final determination on whether to prepare an EIS, adopt a project alternative, or take no further action with respect to the project.

1.4 ALTERNATIVES & GENERAL COMMENTS

COMMENT: General Opinions on the Project & Alternatives

Most commentors, regardless of their position on the project or particular alternative, acknowledged the special value the Presidio holds for them — parents of children who play sports in the park, volunteers who work to restore natural areas, hikers, Presidio residents, and high school students who spend an entire school year studying the watershed. Many expressed strong support for the unique ecological and interpretative values of the project, as well as concern about the effect the project may have on other park uses. A few commentors questioned the existence of a creek and the availability of water.

Various commentors expressed opinions or support for particular alternatives. The overwhelming majority expressed support for Alternative 2 as the preferred alternative. It was stated repeatedly that Alternative 2 appeared to strike a balance — maximize restoration, respect the historic character of the area, improve the visual appearance of the park, and ensure that public uses such as recreation are accommodated. Many of those expressing favor for Alternative 2 requested some modifications to the alternative, which are addressed individually in this summary of public comments. More than 600 individuals expressed support for a specific component included in Alternative 1 (approach to Morton Field replacement), but did not explicitly reference Alternative 1. Some commentors expressed support for “Alternative 3” although the EA does not identify such an alternative. A few of those expressing support for “Alternative 3” also incorrectly referenced “Alternative 3” as the “Trust’s Preferred Alternative,” which is Alternative 2. One commentor advocated that the Trust adopt the “No Action” Alternative.

RESPONSE: The opinions expressed by the public are noted and will be considered as part of the decision-making process for the project. As described in detail under various comment summaries and responses, the Trust has made various modifications to the Preferred Alternative in response to public comments.

With respect to questions regarding the existence of a creek, several commentors correctly noted that Tennessee Hollow has a limited supply of water. Creek flows have never been, and will never be prolific in Tennessee Hollow. The habitat values, however, that are supported by these limited water supplies are immense. Please refer to the “Lack of Water” response to comment for a detailed discussion.

COMMENTS: Playing Fields

This subject of playing fields received substantial attention during the EA comment period. The comments ranged from the very general to site-specific questions and concerns, and have been categorized below into five main topics:

1. Presidio-Wide Playing Fields – General
2. Plans for New Playing Fields
3. Trust Policies Regarding Recreation
4. Morton Replacement Field
5. Land Use – Pop Hicks Field

Presidio-Wide Playing Fields – General

Nearly two-thirds of the letters received on the EA expressed strong support for increasing the number of fields in the Presidio. Overall, there was general appreciation for the beauty and unique setting for Presidio fields, including nearby natural areas. Many commentors expressed concern about field removal given the significant shortage of playing fields in San Francisco. Many noted the important role the Presidio fields play in the community, including creating a family-friendly City, provide opportunities to children and adults alike for increasing health, well-being, and physical fitness, as well as opportunities for people from different social and ethnic backgrounds to interact and be drawn to the park. Some commentors acknowledged that playing fields should not preclude creek restoration and vice versa — stating that is not a “zero sum game.”

Many commentors assumed the subject of the EA was Presidio-wide playing fields. Given the focused scope of the EA, this created confusion and a perception that the Trust was “backsliding” from the momentum and public consensus developed during the playing fields planning effort.

RESPONSE: The focus of this EA is creek restoration. The Trust appreciates and recognizes the valuable role the Presidio’s fields play in serving the recreational needs of San Francisco. Playing fields are a long-standing tradition and part of the historic landscape of the Presidio. The Trust seeks to preserve and enhance this opportunity for the public to enjoy their park. The Trust also concurs that enhancing active recreation does not preclude the restoration of Tennessee Hollow, which also holds great promise and value for the community and the Presidio.

In response to public concern over the possible removal or relocation of Morton Street Field, the Trust placed the creek project on hold to find common ground on the broader issue of playing fields, and undertook an 8-month public planning process. That process explored and built public consensus around a strategy for improving playing fields throughout the park. The effort culminated in April 2007 with a list of priorities for enhancing playing fields and a map showing the long-term vision for the fields. For additional background, please refer to Section 5.1.3 of the EA, and the Trust’s website at www.presidio.gov — see Major Projects, Playing Fields.

In response to the outcome of the playing field planning effort, the Trust has earmarked funding in the current fiscal year (which began October 1) to begin necessary designs for two of the priority areas: upgrading Fort Scott Field and exploring options for a new field at the Child Care Center site. The Trust will continue to pursue all of the proposed upgrades identified jointly with the public until they are fully implemented.

The focus of this EA is specifically on creek restoration. While it implicates Morton Field, and thus addresses its replacement (a commitment made by the Trust), it is not intended to address playing fields throughout the park. The latter is being pursued on a separate track using the guidance provided from the recent public planning effort. Regrettably, the focused nature of the EA, as well as some misinformation, led to confusion

about the Trust's intention. This issue has long been one of the major foci of public debate regarding the project. The Trust hopes that the clarifications provided throughout this document, along with ongoing public outreach and communication, will reaffirm the Trust's position on this subject.

Plans for New Playing Fields

Many commentors urged the Trust to upgrade existing fields and build new fields throughout the Presidio as soon as possible, referencing specific sites discussed during recent public workshops, as well as Crissy Airfield. There was widespread support for multi-use fields. Some identified "12 playing fields by 2012... (up from 3 today)..." as the preferred objective stating that this represents the "right target" for the Presidio. A few of those citing the "12 by 2012" target inferred that this was a consensus point from recent public workshops. A few commentors encouraged the Trust to maximize fields in the Presidio, and to look outside the park and consider partnering with the City. Others suggested various funding options to speed things up if needed, including one unsolicited proposal. Commentors noted that the capacity of any new fields would "be quickly realized" due to overwhelming unmet demand, while a few questioned whether there is a shortage of fields, noting anecdotally that they see many underused fields in the City. The NPS noted that every alternative in the EA retains fields in the watershed and inquired whether the Trust intends to add fields in other locations in the Presidio.

RESPONSE: The Trust is aware of the strong public support and demand for new fields in San Francisco. This need prompted the Trust to undertake the recent public planning effort, and pursue upgrade and expansion of fields in the park (see "Presidio-wide Playing Fields" response to comment above).

With respect to comments addressing "12 by 2012...(up from 3 today)..." the following clarification is offered. There are currently four active fields in the Presidio (Fort Scott, Paul Goode, Morton Street, and Julius Kahn). The Trust is proposing to remove Morton Field; add new fields at the Fort Scott, Child Care Center, and Commissary West sites; rehabilitate Pop Hicks Field; upgrade Julius Kahn; and add a new practice field adjacent to Paul Goode. The Trust does not believe that 12 fields are reasonable or practical given the topography, resources, and competing land uses within Area B of the Presidio, and this was not a consensus point reached during the recent planning effort. For additional information on this subject, please refer to www.presidio.gov, Major Projects, Playing Fields.

Crissy Airfield is outside of the Presidio Trust's area of management. Suggestions regarding this site should be directed to the National Park Service.

Commentors' suggestions that the Trust look outside the Presidio (as well as inside the park) for opportunities to increase playtime are noted. The City has identified a significant shortfall (60 fields) in playing fields, and is actively pursuing opportunities to increase playtime throughout San Francisco. For additional information on that effort and the critical shortages, please refer to the websites for the San Francisco Recreation and Park Department and the City Fields Foundation. The Trust will continue to coordinate with the City regarding Julius Kahn, as well as its plans to increase regional supply and improve the efficiency of the City's allocation system.

As previously noted, the Trust intends to improve existing fields, add new fields where practical and environmentally sound, and relocate Morton Street Field.

Trust Policies Regarding Recreation

Several commentors expressed concerns or requested clarification of the Presidio Trust’s policies regarding active recreation. Some were rooted in the opinion that active recreation is not an appropriate land use in the Presidio, others believed the Trust’s plans and policies are either silent or do not go far enough to promote active recreation. (Also see “Land Use – Pop Hicks Field” response to comment.)

RESPONSE: Active recreation has been part of the Presidio landscape for more than a century — from the golf course established in 1895 to the many playing fields, tennis courts, gymnasiums, and other sports facilities. These uses played an important role in the daily life of soldiers and families living in the Presidio, as well as the nearby community of San Francisco. Since the early 1920s the Army opened its gates to welcome City residents to enjoy active recreation in the Presidio at Julius Kahn Playground and later at other Presidio fields.

Every major planning effort conducted since the base closure announcement, including the National Park Service’s original plans for the Presidio, has acknowledged that the Presidio will continue this long-standing tradition. The National Park Service’s plan specifically provided that Julius Kahn, Paul Goode, and Pop Hicks Fields would be maintained as playing fields. The Presidio Trust’s update to the NPS’s plan similarly made provisions to maintain these fields, and established the following policies and guidance regarding recreation:

“10. Provide for safe and enjoyable recreational use of the Presidio. Improve larger open spaces for outdoor activities and play. Enhance existing recreation facilities, add play opportunities, and complement outdoor areas. Ensure a seamless network of trails and bikeways through the Presidio.

The Trust is committed to providing diverse opportunities for both passive and active recreation, and to maintaining an atmosphere that is open, inviting, and accessible to visitors. In providing these opportunities, the Trust will consider what activities are best suited to the Presidio, and will balance recreational opportunities with resource protection....”

Recreational Facilities – The Trust is committed to retaining facilities for active recreational uses. Existing facilities include...ballfields. In addition, many landscaped open space areas will be maintained for passive recreation. Picnic areas, smaller fields, and Rob Hill’s small-group camping area will be improved.

Additional built facilities, indoors and outdoors, will be considered in the future. Some recreational facilities may be relocated or removed in conjunction with planned projects, such as the restoration of Tennessee Hollow, the reconfiguration of Doyle Drive....” — page 25, PTMP

With respect to Tennessee Hollow, PTMP specifically states that: “Compatible recreational activities will be allowed, although ~~Paul Goode Field~~ (*corrected in the Record of Decision to state ‘Morton Street Field’*) may be removed or relocated to allow for restoration of Tennessee Hollow.” — page 101, PTMP and page 3, Attachment 3, *Record of Decision*).

Also see “Land Use – Pop Hicks Field” response to comment.

Morton Replacement Field

Commentors were divided in their preferences for how to replace Morton Field. Nearly 600 individuals supported the upgrade of Julius Kahn as replacement for Morton Field. Many others questioned whether an improved Julius Kahn constitutes a long-term replacement for Morton Field. Approximately 600 individuals stated that Pop Hicks is the only “true replacement” identified in the EA (with the condition that it accommodate a high school–sized soccer field). A few commentors stated that a field at Pop Hicks is not necessary under Alternative 2, which identifies Julius Kahn as a replacement field for Morton Field.

Several people recommended that the Trust seek to relocate Morton Field outside the watershed, noting that playing fields can be relocated but a watershed cannot. The NPS noted that “many new field locations” outside the watershed were identified during the recent public workshops and questioned why these fields were not considered as replacement options for Morton Street Field in the EA.

RESPONSE: This subject received broad public attention; more than 1,300 letters addressed this issue in some fashion. Encouragingly, nearly all of these letters echoed the public consensus reached during the recent playing fields planning effort — that removal of Morton Street Field to daylight the creek would be acceptable as long as a field of like size and quality is provided as replacement prior to field demolition. Public opinions differed with respect to what constitutes an adequate replacement or appropriate location.

The Trust acknowledges commentors’ preferences and concerns. The Trust’s preferred alternative, Alternative 2, identifies Julius Kahn as a replacement option for Morton Field and also provides that Pop Hicks Field will be returned to active play pending remediation of the underlying landfill. As shown in the EA, the proposed treatment of Pop Hicks would be as a multi-use field that can be used flexibly to accommodate either little league play or a high school–sized soccer field, while also providing habitat enhancements along the western edge of the site. As promised, the Trust will ensure that a replacement field of like size and quality is available for use prior to the removal of Morton Field. The Trust’s preference to upgrade and expand Julius Kahn to accommodate high school soccer use was intended to allow plans for creek restoration to proceed prior to the planned remediation of Landfill E (2011/2012). Once remediation of Landfill E is complete, Pop Hicks Field will be restored to active recreational use as a multi-use high school soccer/little league field under Alternative 2.

Under Alternative 1, Pop Hicks Field would become a dedicated high school soccer field serving as replacement for Morton Field, and a new little league field (replacing the field at Pop Hicks) would be constructed at Fill Site 1, adjacent to Paul Goode. Under Alternative 1, no changes would be made to Julius Kahn and there would remain just one field able to accommodate high school soccer use in the area. The Trust identified Alternative 2 as preferred because it maximizes habitat restoration within the creek and upland areas, while providing two high school–sized soccer/multi-use fields (one at Julius Kahn, one at Pop Hicks), and provides a new practice field at Fill Site 1 without encroaching into areas slated for habitat restoration under the adopted *Presidio Vegetation Management Plan* (which would be necessary to accommodate the little league field proposed under Alternative 1).

With respect to the question of relocating Morton Street Field outside of the watershed, see Section 3.4.3 in the EA. As explained in that section, the recent playing fields planning effort evaluated a wide range of options in the park, and only four sites were identified as viable candidates to accommodate a field the size of

Morton — an important criterion established with public consensus. Two of those sites are located within the watershed — Pop Hicks Field and Julius Kahn. The other two include a potential field on top of the planned future Doyle Drive Tunnel or Fort Scott. See Section 3.4.3 for further explanation regarding their viability as candidates for replacing Morton Field.

Land Use – Pop Hicks Field

One commentor questioned the adopted land use policies of the *Presidio Trust Management Plan* (PTMP) regarding playing fields and in particular Pop Hicks. The commentor specifically questioned the accuracy of the following statement from the EA: “While PTMP directs that the field will be reactivated following remediation of the underlying landfill...” and cited multiple statements in the PTMP and corresponding Record of Decision (ROD) that highlight the importance and prominence of Tennessee Hollow restoration in the future of the park. The commentor concluded that playing fields in the watershed, by their very existence, would preclude Tennessee Hollow restoration, and that “it will be difficult, and I believe impossible, for the Trust to argue that maintaining playing fields within a watershed is compatible the goal of restoring a natural watershed.”

The National Park Service stated that post-remediation land use decisions for Landfill E should be deferred until the development of the Remedial Action Plan (RAP), and that if the RAP recommends removal of all fill material, that the Trust should consider changing the land use designation for the area and consider other locations for Pop Hicks Field. One commentor echoed the NPS comments, encouraging the Trust to defer final configuration of Pop Hicks until cleanup has been completed. Another commentor anecdotally noted that over the years, use of the field has not been sustained and questions why this has occurred, suggesting that the Trust consider this in its decision-making.

RESPONSE: The Trust concurs with the commentor’s interpretation regarding the important role Tennessee Hollow will play in the park’s future, but disagrees that the presence of playing fields within the watershed will preclude restoration or otherwise conflict with PTMP. In fact, some of the most valuable habitat in the Presidio exists within the watershed in close proximity to existing playing fields. The disparity between the PTMP vision and the apparent views of the commentor may rest in confusion over what a “natural watershed” is.

The PTMP specifically seeks to preserve the character of the watershed, while also restoring a vibrant creek system. The character of the watershed is largely defined by historic residential neighborhoods (some of the oldest in the Presidio), as well as recreational uses, historic forest, and creek and natural areas. Unlike a wilderness area, the Presidio is a National Historic Landmark and many of the homes that line the ridges of the watershed, as well as the Julius Kahn Playground, are listed on the National Register of Historic Places as contributing features to the District. The Presidio is also part of a National Recreation Area and it is located in an urban setting. It is, in fact, within the urban context that the project’s greatest values are defined — the ability to restore an urban creek system in the otherwise highly developed San Francisco peninsula, and to provide an innovative and accessible way for a watershed to be used as a demonstration and education site — a site where people can learn about the history of water, the role water played in development of the Presidio and San Francisco, and the role it will play in the future of the planet. It will be a showcase for preserving open space and high biological values within an area where people live, work and play. It will be an

ecologically functioning watershed that demonstrates that nature includes people, as well as plants and wildlife, and in urban areas that it is possible for the three not only to coexist, but thrive.

While the Trust recognizes that some may advocate for an approach to restoration that would remove all other land uses and resources in favor of native habitat restoration, this is neither responsible nor practical given the Trust’s mandate to protect and preserve the Presidio.

The commentor specifically pointed to a statement from PTMP, page 101 which states “Pop Hicks Field will be restored for active recreational use if consistent with the remedial action plan established for the area” noting that this does not prescribe that Pop Hicks Field will be returned to active recreational use, but rather states that future use must be consistent with the outcome of future remediation plans. The NPS made a similar comment, encouraging the Trust to defer land use decisions until remediation planning is complete for Landfill E.

The land use designation for this site has not changed in more than 13 years. The NPS initially identified that Pop Hicks would be returned to use as a playing field and picnic area in the *Presidio General Management Plan* (NPS, 1994), the *Presidio Vegetation Management Plan* subsequently zoned the entire site as “landscape vegetation” in anticipation of this return to active play (NPS and Trust, 2001), and the PTMP echoes these long-standing plans, calling its return to active recreational use when it is safe to do so. The commentor correctly noted that while PTMP reaffirms this long-standing standing land use designation, it indicates there must be consistency between the remediation action plan (RAP) and end use.

The Trust notes that at the time the PTMP was prepared, a preferred remediation alternative for Landfill E had not been selected. Since that time, consistent with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process, the Trust has selected a preferred alternative for Landfill E. The preferred alternative was identified through a detailed screening and evaluation process that included regulatory and public input, and has the concurrence of the NPS. At present, the Trust is waiting for input from the California Department of Toxic Substances Control (DTSC) on the Trust’s preferred remedy before proceeding with the next steps of site planning. Refer to “Remediation Options – Landfill E” response to comment for additional detail.

At this time, the Trust does not anticipate that there will be significant changes to the preferred remediation alternative when the RAP is prepared. The Trust notes the commentor’s observations regarding past attempts to maintain and use the field. While the Trust has no direct knowledge of these observations, the Trust will be careful to ensure that a future field is designed and managed in a sustainable manner. Based on the current shortages of fields, the Trust anticipates that a new multi-use field will quickly realize its full potential in serving the local community.

COMMENT: Landfill E Remediation Options

The majority of those commenting on remediation of Landfill E advocated full removal and offsite disposal of waste materials (“clean closure”). Commentors stated the opinion that use of engineered landfill cover (isolating the waste in place) was not appropriate given the landfill’s location in the watershed, and expressed concerns about the long-term effectiveness of a cover system, associated costs, and “appropriateness” in a

national park. At least one commentor stated that the EA does not adequately address remediation options; others noted that the remediation options have not yet been subject to public review and comment.

RESPONSE: The commentors correctly noted that remediation of Landfill E was not addressed in the EA. Cleanup of the Presidio’s remediation sites, including Landfill E, is subject to a separate regulatory and public review process. As part of that process, detailed investigations have been completed, with regulatory and public oversight, to characterize the nature and extent of Landfill E and examine options for addressing the waste materials. These studies led to the development, screening, analysis, and subsequent identification of a preferred remediation alternative for the site — all of which were subject to public review, and are undergoing regulatory scrutiny. Please refer to the *Draft Report, Feasibility Study Landfill E, Presidio of San Francisco* (April 2005) for detailed information about the alternatives and evaluation criterion. As described in that report, a wide range of remediation options were considered, including “clean closure” as advocated by commentors on the EA. In the study, the Trust identifies, with the concurrence of the National Park Service, a preferred remedy for the site that calls for a landfill cover system (onsite containment) along with creek restoration along the western side of the site and ongoing monitoring.

The Draft Feasibility Study was submitted to the Department of Toxic Substances Control (DTSC) in April 2005, and the Trust is waiting for their review comments. Following receipt of DTSC’s comments, the Trust will prepare the required Remedial Action Plan (RAP), which will select the final remedy for Landfill E. Engineering designs will then be prepared based on the remedy requirements in the RAP, and the remedy is typically constructed within a year after the designs are finalized. (Also see “Land Use – Pop Hicks Field” response to comment.)

COMMENT: Defining the “No Action” Alternative

One commentor stated that the No Action alternative should be consistent with adopted plans, such as the *Presidio Trails and Bikeways Master Plan* and *Presidio Vegetation Management Plan*, rather than a true “no project” (i.e., status quo) condition.

RESPONSE: The Trust initially defined the No Action alternative as suggested by the commentor. During scoping, however, the Trust received overwhelming public input on this issue. The National Park Service, neighborhood organizations, historic preservation and environmental groups, as well as various individuals all asked the Trust to redefine the No Action alternative to reflect true “no project” conditions. At the time, the public urged the Trust do so in order to provide a more accurate baseline. As explained in Section 5.1.2 of the EA, the Council on Environmental Quality’s NEPA guidelines offer agencies two different approaches in defining the No Action alternative — one representing a true “no project” conditions, the other representing what would reasonably occur under existing (adopted) policies and plans. As described in the EA, the Trust revised the No Action alternative in response to public comment to reflect “no project” conditions.

COMMENT: NPS Alternative

The National Park Service (NPS) states that while it supports Alternative 2 and “recognizes and appreciates the complexity of balancing” multiple resources, it believes the Trust should set aside these requirements for the purposes of the EA analysis and include an alternative that (1) removes all playing fields from the

watershed, (2) removes all nonhistoric buildings; and (3) removes all associated infrastructure (roads, parking lots, etc.). The NPS concludes that such an alternative would “maximize ecological process” and thus be consistent with the Trust’s adopted plans.

RESPONSE: The Trust appreciates the NPS’s support for Alternative 2, and also acknowledges that the NPS has requested that the EA include an alternative as summarized above. These suggestions were raised during scoping and are addressed in the EA in Section 3.4. As described in that section, these concepts were initially considered but were removed from further evaluation in the EA for a variety of reasons, including but not limited to their incompatibility with adopted plans and policies, and prior consideration and rejection in the PTMP EIS.

The Trust notes that in the early 1990s, before the Presidio Trust was established, the NPS was charged with developing and analyzing a range of alternatives for management of the Presidio, including Tennessee Hollow. At that time, the NPS selected an alternative that it determined best balanced the Presidio’s unique resource values. The selected alternative established a vision for the watershed as “An Educational and Residential Neighborhood” and provided for creek and habitat restoration that required the removal of some nonhistoric housing, but also ensured the maintenance and preservation of Pop Hicks, Paul Goode, and Julius Kahn as playing fields. As part of that analysis, the NPS also developed, for comparison purposes, an alternative that maximized ecological values — “Alternative C: Expanded Open Space/Restoration/Interpretation – Traditional NPS Management.” The Trust notes that while the stated focus of this ecologically driven alternative was to give preference to native habitat restoration, even under this alternative the three playing fields in the watershed were assumed to be maintained. In essence, the NPS is asking the Trust to consider something that it had apparently determined was not feasible or prudent given the management responsibilities of the park. The request is also inconsistent with other NPS comments expressing cultural resources concerns regarding the minor upgrade of one of the watershed’s fields, Julius Kahn, a contributing feature of the NHLD. Regardless, the Trust believes that Section 3.4 of the EA addresses this issue to the extent practical. (For additional background, please refer to “Policies Regarding Recreation” response to comment.)

COMMENT: Non-Historic Building Removal

Members of the environmental community expressed strong support for the proposed removal of three nonhistoric buildings to enhance restoration. As part of a letter writing campaign, commentors encouraged the Trust to go further by removing two additional nonhistoric buildings (772 and 779). One commentor requested that a statement in the EA regarding the Trust’s notification plans for tenants displaced by building demolition be converted into a mitigation measure.

RESPONSE: The Trust has identified the buildings that are immediately adjacent to and/or implicate restoration plans, and that are feasible to remove at this time. The buildings noted by commentors go beyond the scope of what was contemplated in the PTMP and are not under consideration for removal at this time. Nothing in the proposed project would preclude these buildings from being considered for removal should the Trust reconsider this action in the future.

With respect to converting a statement in the EA regarding the Trust’s approach to tenant notification into a mitigation measure, the Trust believes that such a change is unnecessary and unwarranted as it has no relevance to the environmental effects of the project, and will be implemented as a matter of course by the Trust.

COMMENT: Stewardship & Citizen Groups

There was strong support for the Trust to use stewardship for restoration activities given the high public recreational and educational values afforded by stewardship. One commentator suggested that Presidio Park Stewards Program be expanded to include biological monitoring to further stewardship knowledge. One commentator suggested that the Trust should establish and fund regular meetings for a citizen’s group — “Friends of Tennessee Hollow” — to serve as a community forum to discuss and resolve problems and foster generations of stewardship in the watershed. One commentator suggested that the Trust create a citizen’s advisory board to oversee remediation activities and to ensure timely restoration of playing fields, and flow of information to the public.

RESPONSE: The Trust hopes to rely on community volunteers for the implementation, long-term stewardship, and interpretation of the watershed. As described in Chapter 2 (Purpose & Need) of the EA, these activities are in fact one of the catalysts for the project itself.

Monitoring the health of biological resources across the Presidio and the effect of a particular restoration project on biological resources are both important aspects of the Presidio’s natural resources program. At present, the Trust hires scientific experts to monitor wildlife, and Trust staff monitors vegetation Presidio-wide. The Trust is now taking a comprehensive look at vegetation monitoring throughout the park. That effort will identify which monitoring activities are the most informative and will also assess whether any of those efforts could involve volunteers. The Trust appreciates the comment and will explore opportunities to expand volunteer monitoring in the future.

With respect to the Trust establishing and funding a “friends” group, the Trust welcomes input about how to foster stewardship and ongoing community engagement. Following completion of the environmental review process, the Trust anticipates that the project focus — for at least the next five years — will be on implementation and interpretative program development. The Trust hopes that the existing Presidio Park Stewards program, which is funded in large part by the Trust, will serve as a venue for public engagement and stewardship. If you are interested in participating, please refer to www.presidio.gov “Experiences” “Volunteer Opportunities” for additional information. An existing citizen’s advisory board is also associated with the Presidio Trust Environmental Remediation Program. The board, referred to as the Restoration Advisory Board (RAB), has bi-weekly public meetings. If you are interested in participating in those meetings or serving on the board, please see www.presidio.gov Major Projects, Environmental Remediation Program, Public Participation.

1.5 DETAILED COMMENTS/EDITS

COMMENT: Lovers' Lane

One commentor recommended that special attention be given to better connect Lovers' Lane to the Main Parade Ground, drawing visitors into Tennessee Hollow.

RESPONSE: Lovers' Lane is one of the Presidio's oldest trails and provides an important connection between the heart of the Presidio (the Main Post) and the City of San Francisco. It is also designated as a major trail corridor in the *Presidio Trails & Bikeways Master Plan*. The Trust concurs with the commentor's suggestion and will continue to seek opportunities to improve connectivity in this area.

COMMENT: VMP Boundaries at Fill Site 1

The National Park Service requested clarification that the boundaries of the VMP shown at Fill Site 1 are accurate.

RESPONSE: The vegetation zone boundaries presented in the EA (reference Figure 3.5) and described in the corresponding text, represent the most current and accurate mapping of the VMP.

COMMENT: Figure 4.3-7

The National Park Service requested that Figure 4.3-7 (a graph depicting "Predicted Seasonal Position of Wetting-Front in Eastern Tributary") be updated with "current conditions" stating that without this information it would be "difficult to understand how the seasonal wetting front in the eastern tributary will change as a result of the action alternatives."

RESPONSE: As explained in the text supporting the referenced graph, the *entire* length of the Eastern Tributary is perennially wet under existing conditions. Figure 4.3-7 presents the predicted changes under the two action alternatives and should be viewed in this context.

COMMENT: Parking on Barnard Avenue

The NPS inquired about potential parking at the end of Barnard Avenue, which is represented with "P" parking symbol on Figures 3.3 and 3.4 but not described in the text.

RESPONSE: A parking lot is not planned in this area, and the figures will be corrected in Section 2.0 (Errata). In converting Barnard Avenue to a multi-use trail, a small segment of the existing roadway alignment (as shown in the figures) would likely be maintained to accommodate emergency vehicle access. While it is possible that a handful of informal trailhead parking spaces may be considered in this location, it is not feasible to accommodate a parking lot, given the historic alignment and width of the road as well as surrounding topography.

COMMENT: Reference to Secretary of the Interior’s Guidelines

One commentor recommended that Section 4.2 (Cultural Landscape) include a specific reference to the *Secretary of the Interior’s Standards for Rehabilitation*.

RESPONSE: The Secretary’s Standards are referenced on page 4-12 in association with mitigation measure CR-7, which requires compliance with these standards.

COMMENT: Clarification Regarding Housing Removal

The NPS expressed confusion and requested clarification regarding the Trust’s “commitment” to remove nonhistoric buildings, and referenced the following text from page 3-9 of the EA:

“Consistent with the PTMP, Alternative 1 also contemplates removing a non-historic structure located within 75 feet of the creek (Building 777). As previously noted, the Trust will ensure that substantial notice is provided to residents affected by the proposed building removal, and will work cooperatively to identify other housing options available in the park. Following demolition, the site would be replanted with native vegetation, and an additional section of the Tennessee Hollow Trail would be constructed.”

RESPONSE: The Trust sees no ambiguity in this text, and believes that the text can stand on its own.

COMMENT: Clarification Regarding Treatment of Eastern Tributary Spring

The NPS requested that page 3-9 be modified to clarify that “the 2 acres surrounding the Eastern Trib spring would be designed for native habitat – not just native planting.”

RESPONSE: The text referenced by the NPS states, “The 2+acre area surrounding the spring that feeds the Eastern Tributary would be converted to native vegetation. A diverse suite of native plants and trees, including oaks, buckeyes, willows, and other native riparian and woodland plants, would be established at this site. The nearby earthen historic dam would be revealed, preserved, and interpreted. An interpretative kiosk and new bench/overlook area would be established just below the historic dam.”

The aforementioned text is followed by an extensive analysis of the habitat values of the project (Section 4.4).

COMMENT: Cross Reference to Appendix A

The NPS requested that Section 4.4.4 include a cross-reference to Appendix A.

RESPONSE: This was a typographical error, made only in Section 4.4, which will be corrected as described in the Errata Sheet (Section 2.0 of this document).

COMMENT: Mitigation Measure NR-3/4

The NPS requested clarification regarding which measures apply to Presidio Clarkia and which apply to other species.

RESPONSE: Mitigation Measures NR-3/4 will be clarified in response to this request (see Table 1 in the Final FONSI).

COMMENT: Miscellaneous Comments Section 4.4.1.2

The NPS provided various editorial comments regarding the “Affected Environment” discussion of wildlife, primarily related to bibliographic references.

RESPONSE: Two sources were mistakenly not cited in Section 4.4. These oversights will be corrected as presented in Section 2.0 (Errata Sheet). Please note that the Erin Boydston report is finalized and is referenced according to the author’s stated title: “Boydston E. E. 2005. Behavior, Ecology, and Detection Surveys of Mammalian Carnivores in the Presidio. Unpubl Progr Rep. U.S. Geological Survey, Sacramento.”

2.0 Errata Sheet

The following changes include the correction of typographical or other errors which were discovered following release of the EA, and/or are clarifications provided in response to public comments as summarized in Chapter 1.0. These changes do not substantively alter the conclusions in the EA or otherwise influence the basis upon which the Presidio Trust has made its decision regarding this project. In signing the Final FONSI, the text changes presented below will be incorporated by reference into the Tennessee Hollow Upper Watershed Revitalization EA. Changes are generally presented using verbatim quotes from the EA an underline/strikeout, unless otherwise noted.

MODIFICATIONS TO THE PREFERRED ALTERNATIVE

Several adjustments were made to Alternative 2 (Trust Preferred) in response to public and other agency comments. These changes are captured in the Final FONSI (Chapter 3.0) of this document.

EDITS TO THE ENVIRONMENTAL ASSESSMENT

Figures

- Figure 1.3 – Has been modified as shown on the next page to indicate that Landfill F 2 is considered “other near” term activity.
- Figures 3.3 & 3.4 – Both figures incorrectly included a parking lot symbol at the proposed southern end of Barnard Avenue. No formalized parking lot is proposed in this location under either alternative. Figures 3.3 and 3.4 are hereby corrected. Refer to “Parking on Barnard” response to comment for additional detail.

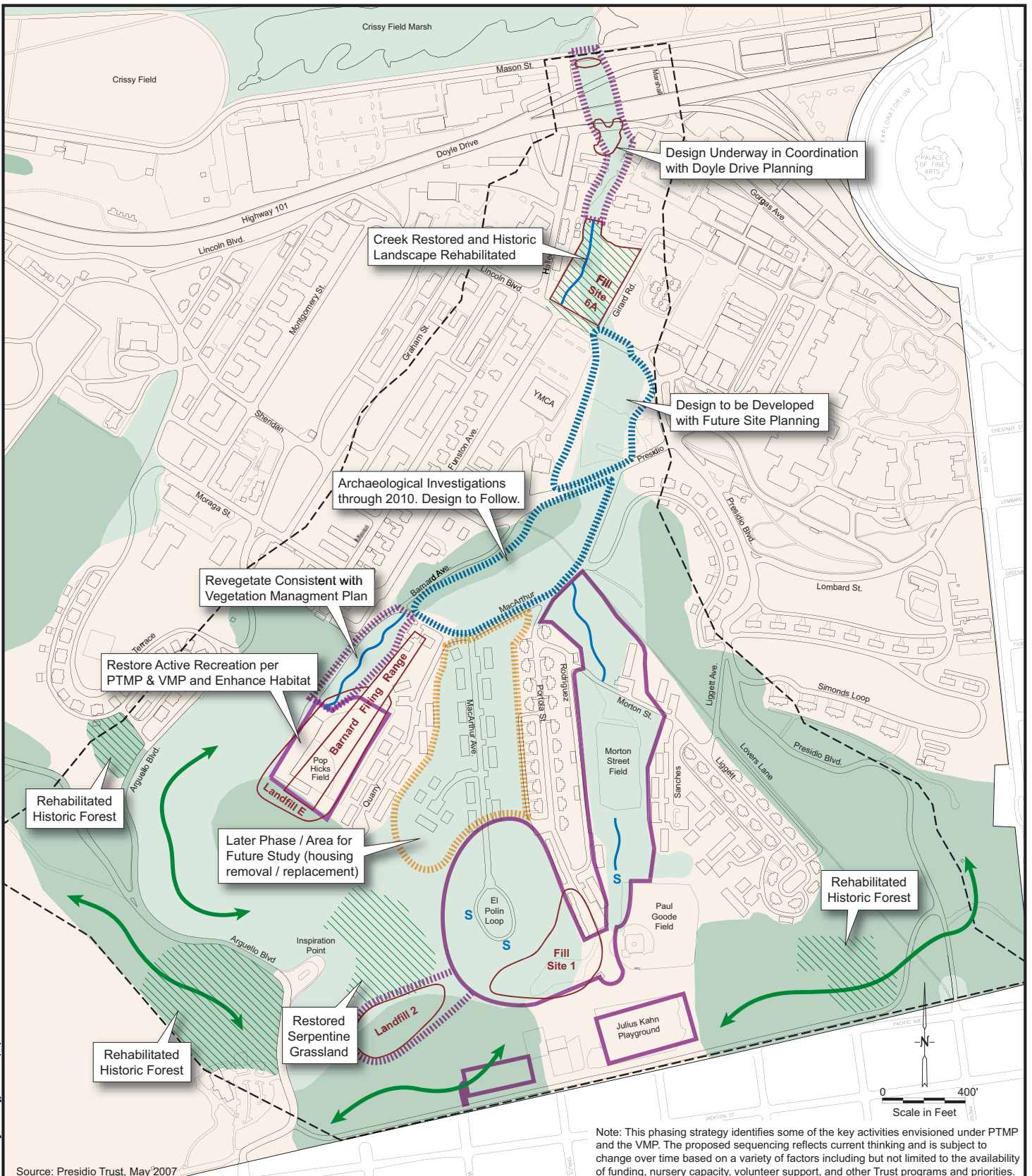
Chapter 4

Section 4.4.1.2, Wildlife, Page 4-35, 3rd Paragraph, last sentence:

“...pygmy nutchatch, and Allen’s hummingbird (Gardali, 2002).”

Page 4-45, 3rd paragraph, last sentence

“Restoration of coastal and central dune scrub habitats could support potential habitat for other species such as the California quail (Harley, et al 2003).”



Note: This phasing strategy identifies some of the key activities envisioned under PTMP and the VMP. The proposed sequencing reflects current thinking and is subject to change over time based on a variety of factors including but not limited to the availability of funding, nursery capacity, volunteer support, and other Trust programs and priorities.

Source: Presidio Trust, May 2007

- | | | |
|---|--|---|
| <ul style="list-style-type: none"> — Focus of EA — Other Near Term — Mid Term — Long Term | <ul style="list-style-type: none"> — Areas Already Restored / Rehabilitated → Ongoing Restoration / Rehabilitation — Remediation Site --- Watershed Boundary | <p>VMP Zones</p> <ul style="list-style-type: none"> — Native Plant Communities — Landscape Vegetation — Historic Forest S Spring — Existing Creek |
|---|--|---|

Figure 1.3
Tennessee Hollow Watershed
Phasing Strategy

August 2007
 Tennessee Hollow Upper
 Watershed Revitalization Project EA



MAGDAPByDSYTHA.2007.Final.EA.Figs.1.3.Phasing.Strategy.dwg - 11/5/07 - bc

Page 4-48, Section 4.4, Mitigation Measures, 1st sentence:

“The following mitigation measures are derived from the PTMP EIA, VMP EA, and Trail Plan EA and apply to both project alternatives. Refer to Table A-1 in Appendix A for a detailed description.”

Chapter 5

Page 5-9, Section 5.4:

5.4 OTHER AGENCY COORDINATION

The following agencies were notified of the project and invited to participate during project scoping comment. Refer to Section 5.1 for an overview of comments received. In addition, Trust staff consulted with representatives from various agencies during project planning, including the NPS and Doyle Drive team.

Federal Highways Administration
National Park Service, GGNRA
National Park Service, Regional Office
United States Army Corps of Engineers
United States Environmental Protection Agency
United States Fish and Wildlife Service
California Department of Fish and Game
California Department of Toxic Substances Control
California Department of Transportation
California Regional Water Quality Control Board
California State Clearinghouse
San Francisco Bay Conservation and Development Commission
San Francisco Bay Regional Water Quality Control Board
San Francisco County Transportation Authority
San Francisco Recreation & Parks Department¹

¹ As described in Chapter 3, the Trust will coordinate with the City regarding proposed improvements at Julius Kahn Playground.

Chapter 6

Gardali, Thomas. 2002. Monitoring Songbirds in the Presidio 1999 – 2002. PRBO Conservation Science. Contribution Number 1065.

Appendix A, Table A-1

As described in Chapter 1 (Response to Public Comments), several modifications have been made to the mitigation measures in response to public comments. These changes are reflected in Final FONSI (Table 1) as presented in Chapter 3 of this document.

3.0 Final FONSI

FINAL FINDING OF NO SIGNIFICANT IMPACT

This final Finding of No Significant Impact (FONSI) provides the basis for the Presidio Trust (Trust) determination that the proposed Tennessee Hollow Upper Watershed Revitalization project, as analyzed in the August 2007 environmental assessment (EA), will not have a significant impact on the quality of 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 is contained in the EA, which is incorporated by reference into this FONSI. A summary of public comments on the EA and project alternatives, along with the Presidio Trust's responses, are included as part of this document (Section 1.0).

PROPOSED ACTION

The proposed action will revitalize up to 28 acres within the upper reaches of the Tennessee Hollow Watershed in the Presidio of San Francisco, a National Historic Landmark District and national park site. Proposed enhancements include creek and habitat restoration, new trails, an interpretative garden, reorganization and rehabilitation of playing fields, picnic areas, and other visitor amenities such as a public restroom. A description of the proposed action is outlined in the Executive Summary of the EA.

BASIS FOR DECISION

Based upon the EA, the Trust determines that both project alternatives (Alternative 1 and Alternative 2) will not have direct, indirect, or cumulative significant impacts on the human environment. The analysis supporting this conclusion is presented in Chapter 4 of the EA. The following summarizes factors considered in this determination.

Archaeological Resources:

Both project alternatives have the potential to disturb unknown archaeological resources and would be subject to the existing protocols and practices stipulated in the Programmatic Agreement to avoid or minimize potential adverse effects. Proposed interpretive enhancements would increase public awareness of the Presidio's archaeological resources and therefore be beneficial.

Cultural Landscape:

Neither alternative would have an adverse effect on the Area of Potential Effects or on the Presidio National Historic Landmark District as a whole. The proposed alterations to the El Polín Springs Loop area would benefit the cultural landscape. Selective tree removal south of the loop is likely to enhance and reveal the

historic impoundment structure. At Pop Hicks Field, the creation of an open stream channel would be considered beneficial because it rehabilitates a topographical feature lost with the creation of the landfill. Alternative 2 proposes a small practice field and parking area west of Paul Goode Field, which requires less area than the proposed Little League field in Alternative 1, and therefore allows for a greater amount of the historic topography to be rehabilitated and therefore provide a greater beneficial effect. Overall, both project alternatives would have positive effects on the cultural landscape of the watershed.

Water Resources:

Proposed activities at El Polín Springs include a reduction in impervious surface area, as well as excavation, re-grading, and revegetation efforts to optimize the existing hydrologic conditions, improving overall ecological processes. Both project alternatives relocate parking lots away from the creek and incorporate best management practices to improve drainage and water quality. Introducing earthen surface channels, floodplains and wetlands would reduce the magnitude of storm runoff events, eliminate source pollutants, and enhance opportunities for sediment deposition and filtration. With best management practices and mitigation measures, both alternatives would improve water quality.

Biological Resources:

Both project alternatives would have long-term biological benefits. Approximately 1,200 linear feet of creek would be enhanced or daylighted and more than 20 acres of native plant communities and wildlife habitat would be restored. Alternative 2 would restore an additional 1 acre of habitat, and provide greater habitat connectivity in key locations. In particular, the conversion of Morton Street to a multi-use trail and revegetation efforts at Fill Site 1 and the Eastern Tributary springs would provide noticeable additional benefits than those provided in Alternative 1.

Visual Resources:

While short-term adverse visual impacts would be anticipated, both alternatives would open up vistas within the project area and revitalize areas that are currently in disrepair. Overall, the long-term visual benefits would be comparable under either alternative.

Air Quality and Microclimate:

There would be a temporary increase in fugitive dust and other emissions during construction of either project alternative. The impact would be less-than-significant, however. Given the existing wind conditions, the increase in local wind velocities following tree removal would be negligible. Once implemented, the project would not impact regional air quality as no stationary sources of air pollutants are part of the proposed action.

Noise:

Predicted construction-related noise levels would be less-than-significant under both alternatives. Once operational, the proposed action would have no impact on existing noise levels.

Transportation and Circulation:

During construction, both alternatives would increase traffic and require temporary detours. The impacts would be less-than-significant. Over the long-term, both alternatives would result in minor changes in local circulation patterns. The effect on traffic at surrounding intersections would be less-than-significant. Parking demand at new or upgraded playing fields would be accommodated on-site, and Alternative 2 would substantially enhance existing parking conditions and pedestrian safety at Julius Kahn Playground. New pedestrian trails would increase access and be considered a beneficial effect of both alternatives.

Cumulative Impacts:

The incremental adverse effects associated with the construction of the project alternatives on archaeological resources, biological resources, air quality and microclimate, noise, and transportation and circulation are not expected to be significant. The incremental contribution of the proposed action to the cumulative effect on cultural landscape, water resources, and visual resources will be neutral or beneficial.

REASONS FOR SELECTION OF A MODIFIED ALTERNATIVE 2

The Trust initially identified Alternative 2 as its preferred alternative in the EA and Draft FONSI (August 2007). Following review and consideration of public comments and feedback from the National Historic Preservation Act (NHPA) compliance process, the Trust has selected Alternative 2 with the following modifications.

Modifications to Alternative 2 (Trust Preferred)

Several minor modifications were made to Alternative 2 in response to public and other agency suggestions. In general, these changes either; reduce the project footprint and/or the level of change that would occur under Alternative 2. As a result, the “modified Alternative 2” falls well within the envelope of environmental effects evaluated in the EA, and no additional analysis is necessary.

Julius Kahn Parking Lot & Circulation

Two circulation variants were analyzed in the EA for Alternative 2. Both proposed parking and pedestrian safety/circulation enhancements in the area surrounding Julius Kahn Playground. In response to public and agency concerns, the Trust has identified a hybrid approach for enhancements in this area. Under the modified Alternative 2, the Trust will maintain vehicle access along West Pacific Avenue, although a portion of the roadway may be limited to one-way vehicle movement in order to enhance pedestrian circulation and safety, and improve on-street parking. Both variants proposed a new parking lot which would be located under the forest canopy. Under the modified Alternative 2, the proposed parking lot will be substantially reduced and/or potentially eliminated depending upon the precise design/capacity of on-street parking enhancements. Refer to “Julius Kahn – Impacts of Parking & Circulation Options” response to comment in Chapter 1 of this document for additional detail.

Julius Kahn Field Upgrade

In response to concerns from the public and NHPA consulting parties, the Trust has determined that it will not pursue use of synthetic turf at the Julius Kahn site. Under the modified Alternative 2, the Trust will, however, pursue expansion and upgrade of the playing field (using natural turf) in order to accommodate a high school size soccer field and little league play as described in the EA. All proposed upgrades will be coordinated with the San Francisco Recreation & Parks Department. Refer to “Julius Kahn – Impact of Field Upgrade” response to comment for additional background.

Other Alternatives

The Trust has considered the following factors in choosing not to select the no action alternative or Alternative 1.

NO ACTION: This alternative was not selected because it does not meet the stated purpose and need of the project. Maintaining the status quo within the project area would preclude the public use, habitat restoration, historic preservation and interpretation goals envisioned in PTMP. It would also preclude construction of the creek side Tennessee Hollow Trail – a major trail corridor identified in the adopted *Presidio Trails & Bikeways Master Plan*. Over time, invasive (non-native) plants would overtake the small pockets of remnant riparian habitat, lessening the ecological diversity of the Presidio. Opportunities for the public to interpret and explore the history of El Polín Springs and its environs would be limited, as would the quality of outdoor amenities such as picnic facilities and restrooms. Morton Street Field would remain in its current unimproved condition including the existing undersized dirt parking lot and portable restroom.

ALTERNATIVE 1: Alternative 1 was not selected for two primary reasons. First, the habitat benefits would be noticeably less under this alternative. Second, this alternative’s reliance on Pop Hicks Field as a replacement site for Morton Field essentially precludes restoration of the Eastern Tributary until 2011-2012 at the earliest. Overall, while this alternative attempts to respond to the basic purpose and need of the project, it is less responsive than Alternative 2.


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, described in Table 1 of this Final FONSI, will be monitored and enforced in accordance with the monitoring and enforcement program (MEP) for the PTMP from which this EA tiers. The Trust’s Compliance Manager will be responsible for monitoring compliance with the MEP. As the primary purpose of the proposed action is creek restoration, there is no practicable alternative, however, that would not involve construction in a wetland.


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. After a thorough analysis of the alternatives and their potential environmental consequences, consideration of all public and agency participation and concerns raised during the NEPA process, and consideration of the mandates of the Trust Act together with the plan set out in the PTMP, the Trust has determined to adopt a modified Alternative 2 for implementation. Based on the 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 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 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. Pursuant to Executive Order 11990, and taking the above information into account, there is no practicable alternative to such action in a wetlands and the proposed action includes all practicable measures to minimize harm to wetlands which may result. 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.

APPROVED:



Craig Middleton
Executive Director, Presidio Trust



Date

<p align="center">Table 1 Tennessee Hollow Upper Watershed Revitalization Project Mitigation Monitoring and Enforcement Program¹</p>				
Mitigation Measure	Reporting Stage	Responsibility for Compliance	Method of Implementation	Enforcement
Archaeology				
<p>CR-8 – <i>Archaeological Management Assessment and Monitoring Program</i>. The Trust will retain the services of a qualified archaeologist who will develop an AMA/MP for areas and undertakings within and adjacent to the APE defined for the project. This program will ensure that all planned site disturbances are reviewed by a qualified archaeologist prior to final design and/or approval. In addition to the AMA/MP, the project archaeologist will prepare and the Trust will review an archaeological research design for any archaeological investigations that are required, and/or test excavations or data recovery from prehistoric or historic sites that are known or discovered. The Trust’s management of archaeological properties is reviewed annually in accordance with Stipulation XXI of the PA. The AMA/MP and any research design required pursuant to this measure would be incorporated into the Trust’s annual report.</p>	Continual	Presidio Trust FPO and Historical Archaeologist (for archaeological discoveries)	Presidio Trust Preservation and Maintenance Program	Document in Annual Report per PA
<p>CR-9 – <i>Ground-Disturbing Activities</i>. Ground-disturbing maintenance activities and construction projects will be closely observed in the APE to discover, document, protect, and manage the archaeological record of the Presidio. The AMA/MP described in Mitigation Measure CR-8 will specify whether archival research, subsurface coring or trenching, and/or test excavations are required prior to ground disturbance, and if so, where. Archaeological monitoring is appropriate in areas of predicted archaeological sensitivity or for sampling purposes in areas that are not considered sensitive when the natural ground surface is obscured by paving or fill, or in other instances where a pedestrian survey or archaeological testing cannot reasonably be accomplished. Any required archaeological monitoring will be implemented in accordance with the AMA/MP and prepared by qualified personnel. If historic properties or prehistoric properties are discovered, a detailed report will be prepared. Should circumstances arise where the Trust cannot address archaeological concerns in a manner consistent with the AMA/MP, the Trust will notify the SHPO.</p>	Prior to Final Design and During Construction	Presidio Trust Project Manager in Coordination with Presidio Trust Historical Archaeologist	Presidio Trust Preservation and Maintenance Program	Document in the Project’s Administrative Record and Annual Report per PA

¹ These mitigation measures were derived from the PTMP EIS or during preparation of this EA and will be adopted and implemented by the Trust as part of the decision. Unless otherwise noted, mitigation measures apply to both project alternatives.

<p align="center">Table 1 Tennessee Hollow Upper Watershed Revitalization Project Mitigation Monitoring and Enforcement Program¹</p>				
Mitigation Measure	Reporting Stage	Responsibility for Compliance	Method of Implementation	Enforcement
CR-11 – <i>Excavation Permits</i> . Per Stipulation XII Part D of the PA, the Trust will require all excavation permits to undergo archaeological review by qualified personnel, as defined in Stipulation III, prior to initiation of the requested activity.	Prior to Initiation of Requested Activity	Presidio Trust Project Manager in Coordination with Presidio Trust Historical Archaeologist	Presidio Trust NEPA/NHPA Compliance Process	Require as Excavation Permit Condition as Stipulated in PA
CR-13 – <i>Curation of Archaeological Collections</i> . All records associated with excavations and excavated materials not subject to the Native American Graves Protection and Repatriation Act (NAGPRA) that are deemed important for preservation will be accessioned, catalogued, and managed in accordance with 36 CFR Part 79, "Curation of Federally-Owned and Administered Collections."	Following Prehistoric or Historic Resource Survey, Excavation or other Study	Presidio Trust Historical Archaeologist in Coordination with Qualified Museum Professional	Presidio Trust Preservation and Maintenance Program	Terms and Conditions included in Contracts, Memoranda or Agreements for Curatorial Services / Periodic Inspections and Inventories
CR-14 – <i>Discoveries</i> . If it appears that an excavation in the APE would affect a previously unidentified property that could be eligible for inclusion in the National Register, or could contribute to the NHL, or affect a known historic property in an unanticipated manner, the Trust will stop any potentially harmful activities in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the property until it concludes consultation with the SHPO.	Immediately following Discovery	Presidio Trust Project Manager in Coordination with Presidio Trust Historical Archaeologist	Presidio Trust NEPA/NHPA Compliance Process	Document in Project's Administrative Record
CR-15 – <i>Treatment of Discoveries</i> . If the newly discovered property has not previously been included in or determined eligible for the National Register and provisions for its treatment are not contained in an approved research design or AMA/MP, the Trust may assume that the property is eligible for purposes of the PA. The Trust will notify the NPS and SHPO at the earliest possible time and consult to develop actions that shall take the effects of the undertaking into account. The Trust will notify the SHPO of any time constraints, and the Trust and the SHPO will mutually agree upon time frames for this consultation, which will not exceed 30 days. If treatment of the discovery is not included in an approved research design or AMA/MP, the Trust will develop written recommendations reflecting its consultation with the NPS and SHPO and, as necessary, will present a plan and schedule to implement these recommendations.	At the Earliest Possible Time following Discovery	Presidio Trust Historical Archaeologist in Coordination with NPS and SHPO	Presidio Trust NEPA/NHPA Compliance Process	Document in Approved Research Design, AMA/MP, or Written Recommendations

<p align="center">Table 1 Tennessee Hollow Upper Watershed Revitalization Project Mitigation Monitoring and Enforcement Program¹</p>				
Mitigation Measure	Reporting Stage	Responsibility for Compliance	Method of Implementation	Enforcement
Cultural Landscapes				
<p>CR-7 – <i>Compliance with Standards for Building and Cultural Landscape Rehabilitation.</i> For historic landscape rehabilitation, projects shall conform to the Secretary of the Interior's Guidelines for the Treatment of Cultural Landscapes.</p>	Prior to Historic Landscape Rehabilitation	Presidio Trust FPO	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
<p>THCL-A – <i>Grading at Morton Field Site.</i></p> <ul style="list-style-type: none"> The extent and gradient of the historic impoundment structure is to be carefully considered in the excavation and revegetation plans required to daylight the drainage swale from the buried culvert. Vegetation selection for the impoundment structures should focus on creating a low, uniform treatment that will allow for the structure to be visible in the landscape. The grades and slope below (east of) Rodriguez Street are to be carefully considered in the excavation plans required to daylight the drainage swale from the buried culvert. Any mature trees on this site which date from the period of significance should be considered for retention until they are senescent. 	Prior to Final Design	Presidio Trust Historic Landscape Architect and Project Manager	Presidio Trust NHPA Compliance Process	Require through Design and Construction Documents and Document in the Project's Administrative Record and Annual Report per PA

**Table 1
Tennessee Hollow Upper Watershed Revitalization Project
Mitigation Monitoring and Enforcement Program¹**

Mitigation Measure	Reporting Stage	Responsibility for Compliance	Method of Implementation	Enforcement
<p>THCL-B – <i>Treatment of Morton Street</i>. For conversion of Morton Street to a multi-use trail proposed in Alternative 2:</p> <ul style="list-style-type: none"> • The historic profile and alignment should be considered as the roadway is converted to a multi-use trail. • Appropriate trail width to be determined by the condition at the end of the period of significance. • Similarly, the width of the proposed bridge would be consistent with width of historic road. • Consider retention of historic building pads, paths and other nonextant structures for referencing in the rehabilitated landscape. 	<p>Prior to Final Design</p>	<p>Presidio Trust Historic Landscape Architect and Project Manager</p>	<p>Presidio Trust NHPA Compliance Process</p>	<p>Require through Design and Construction Documents and Document in the Project's Administrative Record and Annual Report per PA</p>
<p>THCL-C – <i>Treatment of Barnard Avenue</i>. For conversion of Barnard Avenue to a multi-use trail:</p> <ul style="list-style-type: none"> • The historic profile and alignment should be considered as the roadway is converted to a multi-use trail. • Appropriate trail width to be determined by the condition at the end of the period of significance. 	<p>Prior to Final Design</p>	<p>Presidio Trust Historic Landscape Architect and Project Manager</p>	<p>Presidio Trust NHPA Compliance Process</p>	<p>Require through Design and Construction Documents and Document in the Project's Administrative Record and Annual Report per PA</p>

Table 1 Tennessee Hollow Upper Watershed Revitalization Project Mitigation Monitoring and Enforcement Program¹				
Mitigation Measure	Reporting Stage	Responsibility for Compliance	Method of Implementation	Enforcement
<p>THCL-D – <i>Guidelines for Julius Kahn Improvements</i>. For the proposed parking area on West Pacific Avenue and the expanded playing field in Alternative 2:</p> <ul style="list-style-type: none"> The character of the historic forest as identified in the VMP is to be retained in terms of species, pattern and density, where possible, of the original forest planting. Layout and surface treatment of parking shall be developed to minimize the impact, both visual and physical, on the rehabilitated forest stand at this location. Alternative paving system, including permeable systems, should be considered for possible use to maintain its character as historic forest. The forest plantings between the playfield and West Pacific Avenue should be evaluated and considered for rehabilitation. 	Prior to Final Design	Presidio Trust Historic Landscape Architect, Forester, and Project Manager	Presidio Trust NHPA Compliance Process & Forestry Program	Require through Design and Construction Documents and Document in the Project's Administrative Record and Annual Report per PA
Water Resources				
<p><i>NR-15 – Best Management Practices</i>. In order to maintain good water quality during and after project implementation, the Trust would develop and employ Best Management Practices including, but not limited to:</p> <ul style="list-style-type: none"> Maintaining appropriate erosion and siltation controls during construction, and permanently stabilizing all exposed soil or fill Ensuring that all newly constructed impervious surfaces prevent, to the greatest extent feasible, increased water runoff volume and velocity reduced water quality and reduced water infiltration Ensuring protection of normal movement, migration, reproduction, or health of aquatic fauna, including low flow conditions Properly maintaining structures or fill so as to avoid adverse impacts to aquatic environments and public safety Placing excavated fill on non-sensitive upland sites, and stabilizing all material with compatible erosion control techniques 	Prior to Final Design and During Construction	Presidio Trust Project Manager in Coordination with Engineering/Utilities Manager and Natural Resources Program Manager	Presidio Trust NEPA/NHPA Compliance Process	Incorporate BMPs into Project Plans and Document in Project's Administrative Record

<p align="center">Table 1 Tennessee Hollow Upper Watershed Revitalization Project Mitigation Monitoring and Enforcement Program¹</p>				
Mitigation Measure	Reporting Stage	Responsibility for Compliance	Method of Implementation	Enforcement
<ul style="list-style-type: none"> Monitoring storm drain run-off into Crissy Field Marsh and Thompson Reach, and implementing measures to reduce any high levels of organics, sedimentation and contaminants 				
<p><i>NR-17 – Demolition and Construction Activities.</i> During future site-specific planning and environmental review, proposed demolition, new (replacement) construction and intensive human activities would be sited at least 100 feet (or greater distance if deemed necessary to avoid indirect effects) from the edge of existing wetlands, seeps, riparian vegetation or from the top of bank of unvegetated stream channels where feasible. If this is not feasible, the following measures shall be used:</p> <ul style="list-style-type: none"> Install fencing or other barriers adjacent to affected wetlands, streams and associated habitats to prevent inadvertent human, pet or equipment access in wetland systems. Other barriers could include the planting of dense native vegetations Regularly inspect the affected areas to enforce compliance Provide signage and/or other educational devices to encourage voluntary compliance 	During Project Planning and Environmental Review	Presidio Trust Project Manager in Coordination with Natural Resources Program Manager	Presidio Trust NEPA/NHPA Compliance Process	Incorporate Measure into Project Plans
<p><i>NR-19 – Future Design.</i> During the planning process, projects would be designed to prevent alterations to drainage patterns or water movement, in a manner that would result in erosion or siltation on or off site; prevent substantial runoff water which could exceed the capacity of either existing or planned storm water drainage systems, or the infiltration rates of surrounding soils; and prevent additional sources of polluted runoff (also see Storm Drainage mitigation).</p>	During Project Planning and Environmental Review	Presidio Trust Project Manager in Coordination with Natural Resources Program Manager	Presidio Trust NEPA/NHPA Compliance Process	Incorporate Measure into Project Plans
<p><i>UT-7 – Stormwater Reduction.</i> As part of planning for future projects under PTMP, the Trust would implement designs or measures to limit or eliminate impervious surfaces in order to reduce stormwater runoff volumes and improve water quality. The Trust would practice natural stormwater reduction by using on-site vegetation and landscaping as a filtration and retention system to the extent feasible. Grass, sand, and other porous surfaces, particularly when placed around non-porous surfaces such as asphalt, could significantly limit stormwater runoff. Projects would be reviewed to determine if stormwater flows could be limited through reduction of impervious surfaces and addition of porous surfaces.</p>	During Project Planning and Environmental Review	Presidio Trust Engineering/Utilities Manager	Presidio Trust Planning and NEPA/NHPA Compliance Process	Incorporate Designs or Measures into Project Plans and Document in the Project's Administrative Record

<p align="center">Table 1 Tennessee Hollow Upper Watershed Revitalization Project Mitigation Monitoring and Enforcement Program¹</p>				
Mitigation Measure	Reporting Stage	Responsibility for Compliance	Method of Implementation	Enforcement
<i>NR-13 – Wetlands/Compliance.</i> As further details about site-specific activities affecting wetlands and stream corridors are developed, the Trust would undertake applicable compliance steps, including obtaining any necessary permits, under the Clean Water Act Section 401, 402, and 404 programs.	During Project Planning and Environmental Review	Presidio Trust Natural Resources Program Manager	Clean Water Act Section 401, 402 and 404 Programs	Document in Project's Administrative Record
<i>THWR-A – Creek Channel Bank Erosion Control.</i> As part of final project creek design, hydraulic analyses should be completed by experienced professionals to aid in developing appropriately sized, aligned, and stable channels. Special analyses and design considerations should be conducted for fixed points along the creek alignment (e.g., culverts and bridges) where bank instabilities most commonly develop. At these locations, appropriate channel bank/bed armoring techniques may be necessary. Post-channel construction conditions should also be monitored to identify and adaptively manage channel bank conditions.	Prior to Final Design	Presidio Trust Project Manager in Coordination with Natural Resources Program Manager	Presidio Trust Planning and NEPA/NHPA Compliance Process	Incorporate Designs or Measures into Project Plans and Document in the Project's Administrative Record
<i>THWR-B – Trail Creation and Maintenance.</i> Placement and construction of new trails should minimize disruption to soil and slopes susceptible to erosion. The design of trail features that intersect natural surface water bodies, such as bridges or wooden boardwalks (e.g., El Polín Loop) should include measures to avoid or reduce interference with the features' natural flow dynamics. New trails, boardwalks, and rehabilitated trails would be constructed to avoid other hydrologic features, especially the sensitive areas surrounding groundwater seeps and springs. All new or renovated trails should be constructed and maintained in a manner consistent with the best management practices (BMPs) established in the <i>Presidio Trails and Bikeways Master Plan</i> (National Park Service and Presidio Trust, 2003).	Prior to Final Design	Presidio Trust Project Manager in Coordination with Planning Director and Natural Resources Program Manager	Presidio Trust Planning and NEPA/NHPA Compliance Process	Incorporate Designs or Measures into Project Plans and Document in the Project's Administrative Record

<p align="center">Table 1 Tennessee Hollow Upper Watershed Revitalization Project Mitigation Monitoring and Enforcement Program¹</p>				
Mitigation Measure	Reporting Stage	Responsibility for Compliance	Method of Implementation	Enforcement
Biological Resources				
<p>NR-1 – <i>Native Plant Communities</i>. To reduce the possibility of colonization by non-native plant species, the Trust will implement the following mitigation measures:</p> <ul style="list-style-type: none"> • Immediately revegetate with native species areas of native vegetation disturbed by construction, infrastructure repair, and increased land use activities. • Prepare a site-specific revegetation plan for the project site. • Wherever possible, use planting materials (seeds and cuttings) from the local Presidio gene pool. Prioritize the use of propagules from the Tennessee Hollow watershed • Protect all revegetation efforts through buffers and/or barriers during establishment, and maintain and monitor for at least three years. • Native plant/landscape design edges would be monitored for the encroachment of landscape vegetation species into natural areas. If the spread of these species impacts the integrity of the natural vegetation, then control actions would be identified and implemented. • To the extent possible, non-native trees would be felled to prevent direct and indirect impacts to remnant and restored areas. 	Prior to Construction Activities Affecting Areas of Native Vegetation	Presidio Trust Project Manager in Coordination with Natural Resources Program Manager	Presidio Trust NEPA/NHPA Compliance Process	Document in Revegetation Plans

**Table 1
Tennessee Hollow Upper Watershed Revitalization Project
Mitigation Monitoring and Enforcement Program¹**

Mitigation Measure	Reporting Stage	Responsibility for Compliance	Method of Implementation	Enforcement
<p>NR-3/NR-4 – <i>Threatened, Endangered, Rare, Sensitive Species, and Special-Status</i>. To ensure long-term protection of special-status species and to mitigate any project-related indirect and direct impacts on these species, the Trust will continue its inventory and monitoring program.</p> <p>The following project-specific measures would be implemented at the one site where <i>Presidio clarkia</i> occurs within the project area:</p> <ul style="list-style-type: none"> • Erect a temporary construction barrier around the plants and train construction workers in identification and ecological needs of the plants. <p>In addition, the Trust will implement the following measures to ensure that potential impacts to special-status wildlife are avoided or minimized:</p> <ul style="list-style-type: none"> • Conduct surveys for special-status wildlife species including San Francisco forktail damselfly, special-status birds, raptors, and bats prior to construction activities • If a special-status species is found in the vicinity of the project area, adopt a species-specific mitigation plan to avoid or minimize impacts • If project activity commences during the raptor nesting season (January 1 to August 15), conduct surveys in areas of suitable nesting habitat within 500 feet of the project area. If no active nests are found, no further mitigation will be required. If construction is initiated outside the raptor nesting season, no mitigation is required. If an active raptor nest is found, a qualified biologist must determine that the activity has no potential to adversely affect the nest. Otherwise, appropriate buffers will be established and no project activity will commence within the buffer area until the biologist confirms the nest is no longer active. 	<p>Prior to Construction</p>	<p>Presidio Trust Natural Resources Program Manager</p>	<p>Presidio Park Stewardship Program</p>	<p>Require as Part of Recovery Strategy in Recovery Plans/ Incorporate into Annual Workplan and Work Programming Process</p>

**Table 1
Tennessee Hollow Upper Watershed Revitalization Project
Mitigation Monitoring and Enforcement Program¹**

Mitigation Measure	Reporting Stage	Responsibility for Compliance	Method of Implementation	Enforcement
<p>NR-5 – <i>Wildlife and Native Plant Communities</i>. To protect wildlife and native plant communities, the Trust will implement the following measures.</p> <p><i>During Construction</i></p> <ul style="list-style-type: none"> • Schedule heavy equipment use, to the greatest extent feasible, to avoid areas where soils are wet and prone to compaction. • Do not side-cast or spread excavated materials into native plant communities or special-status species habitat. • Apply appropriate erosion and siltation controls during construction and stabilize exposed soil or ecologically compatible fill after construction. • If fill is necessary, use only fill that is certified as weed-free, is compatible with local hydrologic and ecological conditions, and is appropriate for the enhancement of special-status species restoration activities. • Immediately revegetate native plant areas affected by construction with native plant species appropriate to the area and grown from local seed stock, and temporarily cover the soil and/or revegetation areas. • Ensure that human food is never left exposed to wildlife on the construction site. <p><i>Post-Construction</i></p> <ul style="list-style-type: none"> • Prepare interpretive materials and install signage emphasizing resource conservation in areas adjacent to sensitive habitat and native plant communities, and provide other educational devices to encourage protection of these areas. • Consistent with PTMP Mitigation Measure NR-14, regularly inspect restoration areas and for any impacts or damage and implement remedial measures as needed (e.g., increased education and outreach). 	<p>During Project Planning and Construction Activities</p>	<p>Presidio Trust Project Manager in Coordination with Natural Resources Program Manager</p>	<p>Presidio Trust NEPA/NHPA Compliance Process</p>	<p>Incorporate Measures into Project Plans and Document in the Project's Administrative Record</p>

Table 1 Tennessee Hollow Upper Watershed Revitalization Project Mitigation Monitoring and Enforcement Program¹				
Mitigation Measure	Reporting Stage	Responsibility for Compliance	Method of Implementation	Enforcement
<p>NR-6 – <i>Best Management Practices</i>. Site-specific best management practices would be implemented during construction/demolition activities to minimize erosion and potential disturbance in adjacent natural areas. New facilities such as bridges, parking areas, and playing fields would be designed using the latest techniques to reduce runoff, improve storm water quality and otherwise minimize environmental effects. Playing fields would be maintained consistent with the Presidio Trust Roads and Grounds Integrated Pest Management Program which does not allow the use of fungicides or insecticides on playing field turf, and restricts the use of herbicides to those which have a low toxicity, are not on the CA EPA list of known groundwater contaminants, and present a low risk of environmental impact. Trails constructed within the project area would be designed consistent with the BMPs identified in the Presidio Trails and Bikeways Management Plan (Trust & NPS, 2003) including: Drainage Control (BMP #1), Trails in Wet Areas (BMP #2), Trails in Proximity to Sensitive Resources (BMP #10), and Natural Resources Conservation (BMP #12).</p>	Prior to Construction	Presidio Trust Natural Resources Program Manager	Presidio Trust NEPA/NHPA Compliance Process	Incorporate BMPs into Project Plans and Document in the Project's Administrative Record
<p>NR-9– <i>Wildlife and Wildlife Habitat</i>. To protect nesting birds and bat species, the Trust will implement the following mitigation measures:</p> <ul style="list-style-type: none"> • Prior to any building demolition activities, retain a qualified bat biologist to check all window coverings for bats. The qualified biologist will then remove any bats that are present without harm. • To protect active nests of birds covered under the Migratory Bird Treaty Act, limit earth moving, landscaping, vegetation removal, and other heavy equipment activities to the non-breeding season (August through December) and follow park guidelines for the removal of vegetation. • Implement a control program for non-native species such as Norway rats, red foxes, and European starlings. • Phase the removal of mature trees to minimize impacts on tree-dependent bird species. At El Polin Loop, remove trees along the lower edge of the loop and replant with native trees as a first phase. To the extent possible, begin tree propagation several years before planting. Once the lower areas have been restored and vegetation is established, and remediation activities at nearby Landfill 2 and Fill Site 1 are underway, finish removal in the upland areas surrounding the loop. Some targeted tree removal in the upland area west of El Polin Springs may be expedited to ensure protection of Presidio clarkia habitat. 	During Project Planning and Construction Activities	Presidio Trust Project Manager in Coordination with Natural Resources Program Manager	Presidio Trust NEPA/NHPA Compliance Process	Document in the Project's Administrative Record

<p align="center">Table 1 Tennessee Hollow Upper Watershed Revitalization Project Mitigation Monitoring and Enforcement Program¹</p>				
Mitigation Measure	Reporting Stage	Responsibility for Compliance	Method of Implementation	Enforcement
<ul style="list-style-type: none"> Plant fast growing species such as California blackberry and yellow bush lupine (<i>Lupinus arboreus</i>) to quickly re-establish cover for native animals disturbed by vegetation removal Leave snags in existing stands if possible. To enhance the habitat for California Quail and many other species, the Trust will provide and maintain brush piles along the western and eastern edges of the tributary corridors that can be used for cover from predators. 				
<p>NR-12 – <i>Cumulative Activities</i>. The Trust will develop measures to ensure that cumulative disturbance to natural habitat areas within the Presidio does not exceed 20 acres within any given year. No more than 5 acres of that disturbance should be concentrated within one wildlife corridor, sensitive habitat, or plant community without approval from a professional ecologist. This would not apply to disturbances created by natural storm or environmental events. If such events occur, disturbed areas would be restored or treated consistent with natural resources objectives.</p>	Annually	Presidio Trust Natural Resources Program Manager	Presidio Trust Natural Resources Management Program	Incorporate into Annual Workplan and Work Programming Process
Air Quality				
<p>NR-20 – <i>Basic Control Measures</i>. To reduce construction-generated particulate matter (PM₁₀) emissions, construction contractors shall implement as appropriate the BAAQMD's recommended control measures for emissions of dust during construction. Basic control measures are:</p> <ul style="list-style-type: none"> Water all active construction areas at least twice daily; Cover all trucks hauling soil, sand, and other loose materials or require trucks to maintain at least 2 feet of freeboard; Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas; Sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas; and 	During Project Planning and Construction Activities	Presidio Trust Project Manager in Coordination with NEPA Compliance Specialist	Presidio Trust NEPA/NHPA Compliance Process	Incorporate Measure into Project Plans

Table 1 Tennessee Hollow Upper Watershed Revitalization Project Mitigation Monitoring and Enforcement Program¹				
Mitigation Measure	Reporting Stage	Responsibility for Compliance	Method of Implementation	Enforcement
<ul style="list-style-type: none"> Sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets. 				
<i>NR-22 – Deconstruction/Demolition Techniques.</i> To the extent feasible, the Trust shall apply an environmentally effective approach, including a combination of deconstruction and demolition techniques, to remove outdated structures and to reduce PM ₁₀ emissions from demolition activities.	During Project Planning and Construction Activities	Presidio Trust Project Manager in Coordination with NEPA Compliance Specialist	Presidio Trust NEPA/NHPA Compliance Process	Require as Demolition Permit Condition
Noise				
<i>NR-23 – General Construction/Demolition Noise.</i> Construction would be limited to daytime hours (7a.m. to 8 p.m.). During construction, contractors and other equipment operators shall be required to comply with the San Francisco Noise Ordinance (San Francisco Municipal Code, Section 2907b), 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. To reduce noise impacts, barriers shall be erected around construction sites and stationary equipment such as compressors; this shall reduce noise by as much as 5 dBA. To further reduce noise impacts on visitors, some construction sites shall be temporarily closed, and appropriate barriers placed at a distance of 250 feet from the sites.	During Project Planning and Construction Activities	Presidio Trust Project Manager in Coordination with NEPA Compliance Specialist	Presidio Trust NEPA/NHPA Compliance Process	Require as Building Permit Condition
Transportation and Circulation				
<i>TR-22 – TDM Program Monitoring.</i> The Trust will continue to require that all playing field users participate in the Trust's TDM program. The Trust would monitor implementation and effectiveness of the TDM program on an ongoing basis, and implement more aggressive TDM strategies if needed.	Ongoing	Presidio Trust TDM Coordinator	Presidio Trust TDM Program	Require as Permit/Lease Condition
<i>TR-26 – Construction Traffic Management Plan.</i> The contractor(s) of individual projects shall work with the Trust to develop a Construction Traffic Management Plan. The plan shall include information on construction phases and duration, scheduling, proposed haul routes, permit parking, staging area management, visitor safety, detour routes, and pedestrian movements on adjacent routes.	Prior to Demolition and Construction Activities	Project Contractor in Coordination with Presidio Trust Project Manager	Construction Traffic Management Plan	Require as Conditions for Demolition and Construction Permits

