ATTACHMENT D
SPECIFIC COMMENTS ON THE
DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) FOR THE PRESIDIO TRUST IMPLEMENTATION PLAN (PTIP)
NATIONAL PARK SERVICE
OCTOBER 25, 2001

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1.	General	Throughout the document, where project components or mitigations describing a Trust commitment are qualified by the term "if feasible", the constraints that are behind the need to qualify a commitment should be clearly explained. Is this a logistic, economic, technical consideration? What criteria will the Trust use to determine feasibility?
2.	General	For purposes of a National Environmental Policy Act (NEPA) analysis, the designation of the GMPA 2000 Alternative as the No Action Alternative should be consistently presented. Similarly, the Draft Plan Alternative should be presented to the public as the Preferred Alternative and this should also be consistent through the document.
3.	General	Each action alternatives appears to have a greater adverse effect on the environment than the No Action Alternative (for example, adverse effects to the NHLD and cultural landscapes, native plant communities, wildlife, special status plants, water resources, visual impacts, air pollutants, traffic-generated noise, traffic levels, stormwater runoff, native plant communities). Based on the DEIS analysis, the Trust should reconsider the range of reasonable alternatives and modify an alternative to produce one with a lower potential for effect, either similar to or less, than the No Action Alternative.
4.	General	Analyses based on square footages are commonly employed throughout the EIS as the basis on which to predict impacts. But the number of square feet the Trust builds or demolishes may have no relationship or a minor relationship to impacts on any natural or cultural resource. Wildlife, native plants, water resources, archeological resources and many more are all only affected if the activity is in the location of their habitat or the resource itself. An alternative could result in many more square feet of construction, but have fewer or less severe impacts to one or more resources by virtue of *where* that construction takes place.
5.	General	CEQ states that impacts should be "discussed in proportion to their significance." (40CFR§1502.2b). The DEIS rightly contains a substantial amount of description and assessment to Traffic impacts, admittedly an important potential effect of the PTIP. Thirty-three intersections are studied to determine their present levels of service and potential effects. The NPS feels strongly that the impacts to cultural and natural resources are of equivalent importance to potential effects and that an equivalent amount of time and effort should be focused on analyzing the impacts to resources for which the Presidio was established and which the Trust is mandated to protect and conserve.
6.	General	The Environmental Consequences Chapter should assess the effectiveness of each mitigation measures in reducing or avoiding the potential effects for which they were developed.
7.	General	A map of common place names should be included in the DEIS.
8.	General	It would be helpful if the mitigation measures were compiled into a stand-alone section of the DEIS.
9.	S-3	Paragraph 3. The discussion of Trust Act requirements should include reference to Section 103 (b)(1) and explanation of the consideration given to this section of the Act in light of the Trust's mandate for financial self-sufficiency by 2013. This section of the Act states "The Trust is encouraged to transfer to the Secretary [of the Interior] open space areas which have high public use potential and are contiguous to other lands administered by the Secretary" including those lands that "are surplus to the needs of the Trust and which serve essential purposes of the Golden Gate National Recreation Area." (DEIS Appendix B-3). Eliminating natural lands management from Trust responsibility could reduce expenditures by the Trust and avoid duplicating functions also performed by the NPS for Area A.
10.	S-3	Paragraph 5. The DEIS should be corrected to note that a "park-wide amendment" (a reference to the need to re-evaluate park-wide impacts), was prepared for the Letterman project EIS not because a different type of tenant was proposed from the original plan, but because the size and scope of the proposed Lucas development was larger than anticipated in the current plan. As is common in planning, when overall assumptions for an area exceeded, the area-wide assessment is reevaluated.

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11.	S-4 11	Paragraph 1. "The preservation of the integrity of the Presidio National Historic Landmark District status" should replace the term "historic compliance" in the summary list of objectives.
12.	S-4	Paragraph 1. The discussion of plan objectives should be preceded by a statement of the goals of the PTIP rather than the goals of an EIS in general. The only goals listed in the PTIP (p. 14-15) are goals "in relation to the GMPA". The actual PTIP goals are not stated. Both the DEIS and the Plan should have a statement of goals of the PTIP process and explain the relationship between the goals and the objectives (now listed only in the DEIS). The function of the "community assurances" in the PTIP should also be explained. Please clarify whether the assurances carry over into the DEIS and whether they function as Trust commitments to be adopted as policy.
13.	S-7	Per NPS comments during scoping, the Minimal Management Alternative should not be considered as a reasonable PTIP alternative. It provides "no formalized planning or policy direction" (DEIS p. S-7) and is therefore in violation of the Trust Act, which requires "sound principles of land use planning and management" to protect the park resources from development (16 USC 460bb§101(5)). This alternative does not conform to the Planning Principles, the Trust Act mandate to conform to the general objectives of the GMPA nor does it meet the goals and objectives of the Trust or the DEIS.
14.	S-7	Due to the length and complexity of the Summary Table, the Summary would benefit from a brief discussion of the significant adverse and beneficial impacts of each alternative.
15.	Table S-1 General	Table S-1 appears to imply that all adverse effects for all alternatives are mitigated by the mitigation measures listed in the left-hand margin. This implication is not borne out by the text. There is little discussion in the Environmental Consequences Chapter of the effectiveness of the mitigation measures in reducing the potential for effect. In other cases, the mitigation measure is noted as not effective in reducing the potential impact. The NPS recommends that the Table S-1 present the conclusions of effect AFTER the application of the mitigation measures.
16.	Table S-1 General	There are numerous errors in Table S-1, Summary of Environmental Consequences. Errors are of 6 types: 1. incorrect conclusion of effect of the GMPA 2000 Alternative (No Action Alternative) (GMPA 2000 Alternative), 2. inconsistency between the conclusion of effect under Environmental Consequences and the text inserted in Table S-1' 3. incompleteness in reporting the range of possible adverse effects from the Environmental Consequences Chapter, 4. inconsistency in comparing the potential effects of the alternatives against those of the GMPA 2000 Alternative. Effects are sometimes incorrectly compared to the Draft Plan Alternative (Preferred Alternative), 5. incorrect conclusions of the effect of the action alternatives and, 6. inconsistency in terminology used to describe effect of the action alternatives when the alternatives have similar effects. Comments 16-43 address Table S-1 and related text in the Affected Environment and Environmental Consequences Chapters.
17.	Table S-1 (also pages 221-223 and 231-232)	**4.2.1. Impacts on the National Historic Landmark District.** ***GMPA 2000 Alternative (No Action Alternative)*** • Table S-1 states for the GMPA 2000 Alternative: "Demolition of historic buildings would not differ from the 1994 GMPA." However, demolition included in the GMPA 2000 Alternative differs greatly from the 1994 GMPA. In 1994, 48 historic structures were proposed for demolition; 37 of these structures no longer exist. (Thirty-three buildings were removed as part of the Crissy Field project, 3 other buildings were removed due to structural deterioration or contamination). The PTIP should state that, based on a completed 106 consultation process required under the National Historic Preservation Act, the GMPA 2000 Alternative proposes a maximum of 11 specific, historic structures for demolition, totaling 32,155 square feet. Of these 11 structures, all but one are ancillary buildings, such as garages and storage sheds. Table S-1 and the Environmental Consequences Chapter should be revised to reflect this information. The 11 structures should be listed in a table with the building number, a brief description of the structure and the building square footage. • Table S-1, GMPA 2000 Alternative, states: "Removal of historic buildings would have an adverse effect on the NHLD, but not the status of the landmark." However, the text on PTIP DEIS page 222 states: "Because only those buildings previously identified for demolition would be demolished in the GMPA 2000 alternative, *there would be no new adverse effect* from demolition of contributing structures under this alternative." "In summary, the GMPA 2000 Alternative would *not have a new significant adverse impact on historic resources…"*[*Italics* added for emphasis*].* Table S-1 should be corrected to remove the reference to an adverse

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		effect from the GMPA 2000 Alternative and state that removal of the 11 historic buildings was covered under a completed 106 compliance process and was found to have an overall beneficial effect on the NHLD. • Table S-1 for the GMPA 2000 Alternative states: "[The GMPA 2000 Alternative] Would not comply with Trust Act requirements regarding comprehensive management program." Little explanation is given in Table S-1 or pages 221-223 to explain how this conclusion was reached. Page 223, paragraph 1 states that 16 USC 460 bb (c) (1) requires an examination of "the cost effectiveness of building demolition. " The Trust Act requirement to look at cost effectiveness applies only to the 11 structures already considered for demolition in the 1994 GMPA if they cannot be rehabilitated. A separate requirement of the Trust Act calls for "additional study of potential building demolition". There is no reason why this additional study could not occur under the GMPA 2000 Alternative. • The GMPA 2000 Alternative (No Action Alternative) is the sum of the adopted land use plan and the Final EIS adopted through the Record of Decision. This includes all cultural resource mitigation measures listed in the GMPA FEIS on pages 28-29. In the PTIP DEIS, it should be assumed that these additional measures apply, at a minimum, to the GMPA 2000 Alternative. Measures to be added to the DEIS include the requirement to update the inventory of historic buildings, the adoption of the Guidelines for Treatment of Cultural Landscapes and of the Guidelines for Compatible New Construction.
18.	S-10 and 223-224	**4.2.1. Impacts on the National Historic Landmark District. *Draft Plan Alternative and All Action Alternatives*** • Draft Plan. The language in Table S-1 should conform to that on page 224 of the DEIS which states that "new construction could have an adverse effect on individual buildings and/or the NHLD as a whole". • Draft Plan. Table S-1 text states that "new construction would be consistent with the Planning Principles and Planning District Guidelines." To avoid significant adverse impact to the NHLD status from the large amount of allowable new construction under the Draft Plan Alternative, the text should be amended to state that if new construction is found to adversely impact the NHLD status, the project would be modified to avoid the impact or, if the impact cannot be avoided, the proposal for new construction would be withdrawn from consideration. • Draft Plan and all action alternatives. The PTIP should include the comprehensive management program as required by the Trust Act. This would include the park-wide evaluation for possible demolition of the HABS categories 2 through 5 historic structures. The PTIP is proposed as the sole park-wide planning effort for Area B; it is therefore appropriate that this evaluation be important element of the PTIP. The structures that are candidates for evaluation should be mapped for each alternative, evaluated for effects individually and on the NHLD and the potential effects assessed in the cultural resources section under Environmental Consequences. The data used to develop the proposed demolition caps for each alternative, e.g., the 1.07 million square feet maximum demolition in the Preferred Alternative, should also be provided. • Draft Plan and all action alternatives. If the Planning Principles and District Guidelines are to be used to mitigate potential impacts, as stated in Table S-1 and in the Environmental Consequences Chapter, the principals and guidelines need to be included in the DEIS and assessed for effectiveness in protecting cultural resources and the NHLD status. • Draft Plan and all action alternatives. Table S-1 and the text in Environmental Consequences states that "New construction would be subject to further environmental review and National Historic Preservation Act (NHPA) consultation under Section 106." Consistent language is needed throughout the PTIP and DEIS to identify which projects would trigger future environmental assessments and public input. After review of the DEIS, it is not clear what types of actions (projects) have been adequately assessed in the DEIS and, therefore, should be implemented without additional NEPA review. Measure CR-4, the PTIP and the DEIS text addressing future planning should provide clear, consistent requirements for public review and a list and rough schedule of expected future planning efforts.
19.	S-10	**4.2.1. Impacts on the National Historic Landmark District. *Resource Consolidation Alternative*** • Conclusion of impact on the NHLD does not represent the conclusion made on page 225, paragraph 5. • Text should state that the alternative would have a significant adverse effect on individual historic resources and on the NHLD including the Public Health Services Hospital (PHSH) complex and other unspecified demolition of historic structures.

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		• It is our professional opinion that the consolidation of new construction in the historic areas of the Letterman Hospital, the Main Post and Crissy Field and the demolition of the historic PHSH would have an adverse effect on the NHLD.
20.	S-10 242 & 243	**4.2.1. Impacts on the National Historic Landmark District. *Sustainable Community Alternative and Cultural Destination*** • The conclusion of impact is incorrect in stating that effects to the NHLD are "possible significant adverse effect similar to the Draft Plan alternative", but either heightened or lessened effects. Without stating which structures would be demolished or the siting, size and type of new construction, the conclusion cannot be made that less square footage would actually result in "lessened effects." It has not been demonstrated that the Planning Principals or the District Guidelines would be sufficient in their application to prevent adverse effects. The text should be corrected to state that an adverse effect to the NHLD would occur due to unspecified new construction and unspecified demolition. • Table S-1 text does not reflect the conclusions made on page 226 – 227 and 228.
21.	S-10	**4.2.1. Impacts on the Cultural Landscape, *GMPA 2000 Alternative (No Action Alternative).*** • The text should clarify that new construction "would only be permitted if existing buildings and improvements did not meet essential management needs. (GMPA FEIS p. 189).
22.	S-10 229-231	**4.2.1. Impacts on the Cultural Landscape, *Draft Plan (Alt. 1), Resource Consolidation (Alt. 2), Sustainable Community (Alt. 3) and Cultural Destination (Alt. 4)*** • Alternatives 1 through 4 would have an adverse effect on the cultural landscape and the integrity of the NHLD. • The scale of demolition proposed in Alternatives 1 through 4 is vastly different from the GMPA 2000 Alternative which would remove from the cultural landscape only historic 11 structures, due to deteriorated condition, lack of historic integrity, contamination, the effects of which have already assessed through a completed 106 consultation and was found to have beneficial effects on the cultural landscape. • Similarly, the GMPA 2000 Alternative identified areas proposed for the demolition of non-historic structures and the construction of new structures. As similar information has not been provided for Alternatives 1 through 4, a finding that there would be a similar effect cannot logically be made. • The amount of square footage to be demolished in each alternative cannot be used as the sole indicator of effect. Often the removal of non-historic square footage would actually benefit the cultural landscape. It is the amount of unspecified demolition and new construction that leads to the conclusion that an adverse effect to the cultural landscape would occur.
23.	S-10 231	**4.2.1. Impacts on the Cultural Landscape, *Minimal Management Alternative*** • The effects of the Minimal Management Alternative are not assessed relative to the GMPA 2000 Alternative. • The Minimal Management Alternative would have an adverse effect on the cultural landscape as the Historic Forest would not be rehabilitated and replaced, the Main Parade Ground, historic streetscapes, paths and linkages would not be restored, the PHSH would not have the non-historic addition removed, East Housing would not be removed, and other features already assessed as part of the completed 106 consultation for the 1994 GMPA would not occur. • The DEIS does not provide an assessment of potential effects of the Minimal Management Alternative consistent with the level of assessment required under the NHPA that would allow a conclusion of a lesser degree of effect to be made.
24.	S-11	**4.2.2. Impacts on Archaeological Resources, *All Action Alternatives (Except Minimal Management)*** • The Draft Plan Alternative includes a possible underground parking garage that has the potential to adversely effect to archaeological resources to a degree much higher than the GMPA 2000 Alternative. The DEIS does not mention the underground parking garage, which is repeatedly noted in the Plan document (PTIP p. 52, 87, 91 and 149). The assessment of archaeological impacts should address subsurface parking facilities. The DEIS should also identify if the other action alternatives (except Minimal Management) include a possible underground parking facility.
25.	S-12 page 238-240	**4.3.1. Impacts to Native Plant Communities, *GMPA 2000 Alternative (No Action Alternative)*** • As clearly noted on page 238, the GMPA 2000 Alternative would have a beneficial effect on Native Plant Communities. • Table S-1 should include the expansion of Crissy Marsh as an important benefit to native plant communities.

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		• The statement "demolition, new replacement construction, and land uses" would effect native plant communities is incorrect. There is no "replacement construction" proposed as part of the GMPA 2000 Alternative. The areas of new construction under the GMPA 2000 Alternative do not support native plant communities so the effect would not occur. Demolition is sited in an area that would be recovered to provide essential habitat for the SF lessingia – other structures proposed for demolition would also not impact native plant communities. Table S-1 and the text on page 240 should be corrected. • To avoid the noted potential impact to the San Francisco Owl's Clover population north of the Log Cabin in Ft. Scott and isolated wetlands in these areas, the VMP zoning for the GMPA 2000 Alternative should be amended to protect these resources. These resources are recently discovered and the incorporation of this amendment would conform to the spirit of the GMPA to maximize native plant recovery and protect and restore pocket wetlands (GMPA FEIS p. 194, para. 3).
26.	S-12	**4.3.1. Impacts to Native Plant Communities, *Draft Plan Alternative (Alt. 1), Resource Consolidation (Alt. 2), Sustainable Community (Alt. 3), Cultural Destination (Alt. 4) and Minimal Management Alternative(Alt. 5)*** • The Alternatives 1, 4 and 5 do not have an impact similar to the GMPA 2000 Alternative. These alternatives would modify the VMP zoning map in the area of the Nike swale and the PHSH parking lot without providing compensating mitigation with an equivalent replacement ratio by type and value. • Alternatives 1, 3, 4, and 5 would have an adverse effect on native plant communities by not providing for Crissy Marsh expansion. • Alternative 1, 2, 3, 4 and 5 provide less acreage of native plant community than the GMPA 2000 Alternative. For example, the DEIS states the Draft Plan Alternative would have 7 acres less native plant habitat than the GMPA 2000 Alternative. The DEIS should then map where the 7-acres difference occurs and assess the effects of the reduction in native plant community by habitat quality, habitat value, and corridor connectivity. • To avoid the noted potential impact to the San Francisco Owl's Clover population north of the Log Cabin in Ft. Scott and isolated wetlands in these areas, the VMP zoning for all action alternatives (including Resource Consolidation but excluding Alternative 5) should be amended to protect these resources.
27.	S-12	**4.3.1. Impacts to Wildlife, *Draft Plan Alternative (Preferred Alternative)*** • The Draft Plan Alternative is not similar in effect to the GMPA 2000 Alternative. The Draft Plan Alternative would have an adverse effect on wildlife compared to the GMPA 2000 Alternative in not providing for the expansion of Crissy Marsh and by possibly siting new construction in the PHSH parking lot, an important wildlife corridor. • The relative amount of open space should be discussed relative to the 794 acres provided in the GMPA 2000 Alternative.
28.	S-12	**4.3.1. Impacts to Wildlife, *Resource Consolidation Alternative*** • The table and DEIS text on page 242 should be corrected to show that the increase in open space is from 794-838, a 44-acre increase compared to the GMPA 2000 Alternative. • (continued from above comment) The 44-acre area can only be assessed as a benefit if the specific characteristics of the 44 acres in relation to wildlife values are assessed.
29.	S-12	**4.3.1. Impacts to Wildlife, *Sustainable Community and Cultural Destination*** • These alternatives would have an adverse effect on wildlife not noted in Table S-1 by not providing for the expansion of Crissy Marsh and removing of an additional one-acre from Tennessee Hollow restoration corridor as the site of possible new construction. • The Cultural Destination Alternative would have an additional adverse effect on wildlife not noted in Table S-1 as a result of allowing development in the Nike swale area and the PHSH parking lot. • The conclusion of a beneficial effect to wildlife from increased acreage of open space must be based on an assessment of the actual wildlife values in the 12-acre increase.
30.	S-13	**4.3.1. Impacts to Wildlife Movement, *GMPA 2000 Alternative (No Action Alternative)*** • The NPS does not concur that the construction and demolition actions of the GMPA 2000 Alternative would significantly disrupt wildlife movement given the degree and effectiveness of the mitigation measures applied to reduce potential effects. • The text should be corrected to state that temporary disruption could occur during demolition but that mitigation would reduce the

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		effect to a minor adverse effect. • In the GMPA 2000 Alternative, new construction is minimal and not in wildlife corridors.
31.	S-13 251 – 252	**4.3.1. Impacts to Wildlife Movement, *All Actions Alternatives*** • This assessment suffers from the failure to identify what threshold constitutes an adverse effect to wildlife movement. The potential for effect is noted for each alternative but the DEIS fails to characterize the relative importance of the potential effect. The assessment is inadequate, as it provides no standard against which the public can compare the relative outcomes of the various alternatives. Each conclusion of impact should state whether the impact is beneficial or adverse, major or minor, direct or indirect, short-term or long-term.
32.	S-13	**4.3.1. Impacts to Special Status Plants*, GMPA 2000 Alternative (No Action Alternative)*** The conclusion of effect for the GMPA 2000 Alternative should state that GMPA 2000 Alternative would have a beneficial effect on special status plant species.
33.	S-14	**4.3.1. Impacts to Special Status Plants*, Draft Plan Alternative (Preferred Alternative)*** Minimal Management Alternative has an adverse effect because Wherry is not removed. The DEIS should assess the degree of impact on special status plants of the longer phasing of Wherry Housing removal in the alternatives.
34.	S-14	**4.3.2. Impacts to Wetlands and Other Features, *All Action Alternatives*** • Preferred Alternative. The impacts of the Draft Plan Alternative are adverse as compared to the GMPA 2000 Alternative rather than similar as listed in Table S-1. Page 262 of the DEIS states that "should the expansion [of Crissy Marsh] not occur, this alternative could result in an adverse impact to the hydrologic function of the tidal marsh system." • Preferred Alternative, Sustainable Community, Cultural Destination, Minimal Management Alternatives. As Crissy Marsh expansion is not provided for in the Plan or DEIS description of this alternative, there is potential for a significant adverse effect to the marsh function. This potential effect should be clearly stated in Table S-1. • All Action Alternatives. The potential impact of an underground parking garage on groundwater flow should be assessed.
35.	S-14	**4.3.2. Water Quality, *GMPA 2000 Alternative (No Action Alternative)*** • Table S-1 should clearly state that there is a potential for a adverse effect to water quality from the GMPA 2000 Alternative, particularly from demolition but the impact would be reduced to a minor adverse effect with the application of the mitigation.
36.	S-15	**4.3.3. Impacts to Visual Resources, *GMPA 2000 Alternative (No Action Alternative)*** • Table S-1 should state (per p. 267), that the GMPA 2000 Alternative would have a beneficial effect on the Visual Resources.
37.	S-15	**4.3.3. Impacts to Visual Resources, *All Action Alternatives (except Minimal Management)*** • The NPS does not concur that the Action Alternatives (except Minimal Management Alternative) would have potential effects on Visual Character similar to the GMPA 2000 Alternative. These alternatives all propose "unspecified" new construction within Area B. Some siting locations may affect viewsheds within the Presidio or affect the aesthetic character of areas that would be left undeveloped in the GMPA 2000 Alternative. • The mitigation measures listed in the margin of the table do not address reducing the effects of new construction. An assessment of the effectiveness of the mitigation measures should be provided in the text. • The Table states that the Draft Plan Alternative would have "a higher level of new, compatible construction." Is this implying a benefit to the visual character of the park by additional construction?
38.	S-15	**4.3.4. Impacts to Air Quality, *GMPA 2000 Alternative (No Action Alternative)*** Table S-1 should be corrected to state clearly that standard mitigation measures applied to the GMPA 2000 Alternative (No Action Alternative) would reduce potential demolition emissions to a to minor level of effect.
39.	S-15	**4.3.5. Impacts from Construction Noise, *GMPA 2000 Alternative (No Action Alternative)*** Table S-1 should state the conclusion of effect from page 286 finding that "strategies adapted from the GMPA EIS would adequately reduce construction and demolition noise [presumably to a minor level of impact].

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40.	S-17 290 – 295	**4.4.1. Impacts to Land Use, *Draft Plan Alternative (Preferred Alternative)*** The Table should be corrected to show that the Draft Plan Alternative has the potential for a significant adverse effect on land use. The NPS strongly disagrees with the conclusion that impacts from the Draft Plan Alternative would be similar to that in the GMPA 2000 Alternative. The significant adverse effect on land use is based on increased visitation, noise and traffic, adverse effects on the visitor experience and recreation as compared to the GMPA 2000 Alternative <u>and</u> the ineffectiveness of the mitigation to reduce potential effects. • The conclusion of effect in Table S-1 is based on a comparison to the existing condition and not to the GMPA 2000 Alternative. Land use should be compared to GMPA 2000 Alternative land use as should square footages of land use types. • Under the GMPA 2000 Alternative, the Main Post structures would house primarily visitor-serving and visitor program uses. The Draft Plan Alternative would focus visitor use outside of the buildings mainly for events, festivals, etc. The interior of the buildings are not set aside for visitor use but could be leased to long-term tenants for administrative and office functions. • The level of development and the intensity of uses possible in Area B of Crissy Field, as envisioned in the PTIP, would not complement the newly completed, low-density open space use at Crissy Project as predicted in the PTIP (p. 83). Yet the DEIS (p. 292) states that "[the Draft Plan in] Introducing active visitor oriented uses adjacent to a relatively passive recreation area could conflict with resource goals for the recently restored Crissy Field Marsh (Area A)." These statements indicate that not enough is known about the PTIP proposal for Crissy Field in Area B to make an adequate assessment of the degree of the compatibility between it and Crissy Field in Area A. Under the Draft Plan, Crissy Field in Area B would have 300,000 square feet more development than the GMPA 2000 Alternative for a total of 690,000 square feet. There is a wide range of general land use types proposed for this area and some of the buildings could house destination attractions and several museums. The DEIS should provide an assessment of the potential effects to cultural resources, visitor experience, traffic, visual resources, recreation which to develop an assessment of overall compatibility with Crissy Field in Area A. The DEIS should demonstrate, at this stage of planning prior to executing leases, that the Trust proposal would not diminish the qualities of open space and contrast from the adjacent urban areas that characterize Area A land use. • Measure CO-1 requires further clarification. The text description on page 292 states that "Mitigation requiring monitoring of Area B <u>uses</u>, and coordination with the NPS to ensure that proposed <u>uses</u> compliment Area A" would address potential effects. The word "uses" seems to limit coordination with the NPS to a time frame after Crissy Field, Area B, is developed when conflicts between uses may occur. The mitigation measure wording is also ambiguous. The NPS requests that CO-1 be modified to clarify the commitment on the part of the Trust , identify at what stages coordination between our agencies would occur and describe how the role of the NPS in the leasing and planning process for Crissy Field in Area B.
41.	S-17 290 – 295	**4.4.1. Impacts to Land Use, *All Action Alternatives*** • Table S-1 assessment for land use compares the Action Alternatives to the existing condition rather than to the GMPA 2000 Alternative. The conclusions should be modified to meet NEPA requirements. • The DEIS should assess whether the consolidation of new construction in the northern half of the Presidio is an adverse effect to land use as compared to the GMPA 2000 Alternative.
42.	S-17	**4.4.2. Impacts to Housing Supply, *All Alternatives*** • No conclusions of effect are given for this impact.
43.	S-18 308	**4.4.4. Impacts to Visitor Experience, *GMPA 2000 Alternative (No Action Alternative)*** • Table S-1 should conclude that the GMPA 2000 Alternative would have a beneficial impact on the visitor experience. • Table S-1 repeats the misconception that "the level of programming [under the GMPA 2000 Alternative] would depend on the initiative of park tenants". The description of visitor experience for the GMPA 2000 Alternative in the Table and on page 308 should reflect the visitor program set forth in the 1994 GMPA pages 24 - 32. The GMPA describes a range of both park-initiated and Presidio community-initiated programs in areas such as stewardship, cross-cultural communication, community service, health and scientific discovery. Also noted are an expanded visitor center, smaller museums, galleries, concerts, festivals, etc.

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44.	S-18 308 – 312	**4.4.4. Impacts to Visitor Experience, *Draft Plan Alternative (Preferred Alternative)*** • The Draft Plan Alternative would greatly increase visitation to Area B and concentrate visitor activities and attractions along Crissy Field. The NPS finds that the unspecified nature of the proposal and the high visitation and concentration of activities would not complement the adjacent Crissy Field Project in Area A and could adversely effect the visitor experience for visitors to Crissy Field. • Mitigation measures CO-4 through CO-8 would not be adequate to assure that impacts would not occur. An opportunity should given to the public and agency to consider a comprehensive planning process for Crissy Field in Area B before long-term leases are executed and projects approved one by one. Mitigation measure CO-5 would allow the Trust and NPS to confer reactively on how to solve visitor experience problems caused by projects already in place. Further Mitigation Measure CO-5 only offers a cooperative environmental review process for new forms of visitor activities, rather than for proposed projects and leases that would bring the visitor activities. • <u>All Action Alternatives (except Minimum Management Alternative).</u> Table S-1 should be corrected to reflect the potential adverse effect to the visitor experience in Crissy Field Area A as a result of the Action Alternatives (excluding the Minimum Management Alternative).
45.	S-19 312 – 314	**4.4.5. Impacts on Recreational Activities, *All Action Alternatives*** Table S-1 states that all action alternatives would have a beneficial impact on recreation. The assessment (pp. 312-314) does not address impacts to the recreational user groups in the Presidio. As with visitor experience, the large increase in annual visitation will impact recreation activities and use, especially along popular Crissy Field. The Environmental Consequences Chapter should assess the effects of development, traffic and visitation increases on recreational uses in Crissy Field and elsewhere in Area A.
46.	S-19 – S 21	No conclusions of effect are presented in Table S-1 (entitled Summary of Environmental Consequences) for Public Safety, Congestion, Parking Demand, Pedestrian and Bicycle Facilities, and Transit Demand impact topics.
47.	S-19	4.5. Congestion. Table S-1 should be revised to reflect the unmitigatable adverse effect for three intersection (based on Table 47, p. 326) and present the intensity of this effect.
48.	S-20	Parking. Clarify whether providing excess parking is an adverse or beneficial effect.
49.	S-21 - 24	Water Supply, Wastewater Generation, Storm Drainage, Solid Waste, Electricity, Natural Gas, Energy Consumption, Presidio Trust Operations. Based on the assessment in the Environmental Consequences Chapter, a conclusion of effect for the Alternatives should be added to the summaries (in Table S-1) under each impact topic. According to the assessment no adverse impact would occur with mitigation in force.
50.	7	Paragraph 2: " As authorized by the Trust Act, <u>NPS,</u> in cooperation with the Trust, provides visitor services and interpretive an educational services throughout the Presidio." Change this wording to "<u>NPS shall be responsible</u>, in cooperation with the Trust". This language more closely follows the Act's language.
51.	11 -13	The NPS recommends that each alternative be evaluated for its conformance to the Presidio Trust PTIP objectives. These objectives should be modified to include protection and enhancement of the park resources and the visitor experience.
52.	19	Administration. The list should include NPS administration offices, the Presidio Collections Facility, archives, the landscape plant nursery, native plant nursery, stewardship offices, dormitory housing, and facilities for archaeology, warehousing, maintenance, and interpretation and visitor services.
53.	20	Table 1: • The NPS recommends that the GMPA 2000 Alternative be noted as the No Action Alternative and that the column of existing conditions be deleted. Without this change, the GMPA 2000 Alternative could be confused as being an action alternative and the column labeled Current (2001) could be seen as the no-action alternative. • In addition to describing the square feet, the footprint (sq. ft coverage) of the existing and proposed construction would also be helpful.
54.	33 35	The PTIP DEIS proposes to modify the VMP and Finding of No Significant Impact (FONSI). To support the proposed amendment, the PTIP DEIS should provide a map of the proposed amendments to the VMP zoning for each alternative. The acreages, the proposed

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		zoning changes, the rationale for the proposed zoning changes, the impact of the proposed changes on the resources, proposed mitigation to reduce effect and the effectiveness of the mitigation should be clarified.
55.	37	Paragraph 4. The DEIS should note that is required that every federal agency reuse existing historic structures prior to new construction rather than stating that the Trust will make "...every reasonable effort...."
56.	37	"The historic character and integrity of the NHLD will be protected." This is a description of the Draft Plan. But on p. 223, the EIS admits that although the majority of demolition in the Draft Plan would be of non-contributing buildings, historic structures that may not be cost-effectively rehabilitated would be evaluated for demolition. Some of these may contribute to the NHLD, and the status of the NHLD "could be impaired through the loss of contributing buildings…" This contradiction between the two chapters of the document is confusing and leaves doubt as to the future of the NHLD.
57.	88 221, (para.5)	Paragraph 1. The discussion of the Trust Act and Historic Buildings gives an incomplete picture of the Trust responsibility and the current status of the NHLD. Despite the direction in the Trust Act, the Trust is still required to comply with the NHPA in regard to structures contributing to the NHL. The Section 106 evaluation must be in compliance with that the NHPA and it should be understood that removal of contributing structures, even those in the 1985 HABS listing, could pose an adverse effect to the NHL, leading to delisting. The discussion should also describe the role of the 1993 update to the NHL for purposes of 106 compliance.
58.	93 238	The description of plant communities, native vegetation, wetlands, special status plants etc. is written in excellent detail. The reader knows where each of these vegetative types occur on the site, which are in Area B, the names, status and habitat for each of the 13 species of special concern, etc. Yet, the impacts of the alternatives on these specific communities are not grounded in the detail provided in the Affected Environment Chapter. The Environmental Consequences assessment is instead based on acres of open space, square feet of demolition, as well as assurances that mitigation measures would protect vegetation. Resources described in specific detail in the Affected Environment Chapter (for example, "…a 0.6-acre serpentine outcrop in the vicinity of the World War II Memorial in Area B on p. 106), should also be analyzed for effect in site specific detail.
59.	108	The PTIP DEIS should state that the restoration strategies and mitigation measures in the VMP were adopted by the Trust through the signing of a Finding of No Significant Effect by the Trust Executive Director.
60.	127	Wetlands, Streams, and Drainages. The information here should be updated to reflect the most recent wetland delineation.
61.	135	The EIS includes a good summary of regulations and plans that have air quality implications, but does not describe affected environment at or around the Presidio.
62.	137	Noise. This section should also address the potential impacts of noise on wildlife.
63.	172	For clarity in understanding the scope of the PTIP, the document should identify those visitor facilities that are in Area A, administered by the NPS or administered under an agreement by the GGNPA.
64.	210	Page 212 (Water Quality) states that a series of oil/water separators treat storm water before discharging into Crissy Marsh. The discussion on page 210 indicates one oil/water separator on the E and F discharge line. Please confirm.
65.	222	Paragraph 2. "Under the GMPA 2000 Alternative, a maximum of up to 1.12 million square feet of buildings could be demolished. The majority of this demolition would be of non-contributing buildings…" This statement requires clarification. Rather than the "majority" of the demolition (implying over 50%), approximately 97% of the demolition would be non-contributing buildings. It would be more accurate to change "majority" to "nearly all" or "97%".
66.	222 –224 226 – 228	For all the action alternatives, it should be clarified whether the maximum square foot age for demolition includes demolition of the Commissary; PX and other structures if so required for the construction of adopted Doyle Drive alternative.
67.	222	Paragraph 2. The discussion of the GMPA 2000 Alternative should include a brief discussion of why, in the 1994 assessment, the overall effect to the NHLD was concluded to be beneficial despite the demolition of specific historic structures.
68.	222	Paragraph 3. An important oversight in the description of the effect of the GMPA 2000 Alternative is that new construction, 170,000 square feet total, would be proposed only to complement the protection or interpretation of park resources or to replace the functions of a building lost to demolition. In addition, the GMPA identified specifically where in the Presidio new construction and demolition would occur. Please add this information to the PTIP. The discussion of the GMPA 2000 Alternative fails to note that additional

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		demolition or new construction would require an amendment to the plan. The discussion of effect should cite the appropriate pages from the GMPA FEIS.
69.	223	Paragraph 2: "In accordance with the PTIP Planning Principles, the Draft Plan Alternative would preserve, rehabilitate and reuse historic structures to the maximum extent feasible." Given that information has not been provided on which structures would be preserved to the maximum extent feasible, this statement does not provide adequate assurances to characterize the potential impact to historic structures and the status of the NHLD.
70.	223	Paragraph 4. The DEIS should assess the effect of the reduction in the amount of demolition proposed on the NHLD, the cultural landscape and natural resources. For example, the Draft Plan would demolish 50,000 square feet less of structures than the GMPA 2000 Alternative. Since the GMPA 2000 alternative proposed mainly to remove non-historic structures to improve the NHLD and restore natural resources, the DEIS should consider the effect of reducing the demolition with focus on the specific resources that were to benefit from demolition in the GMPA 2000 Alternative. Note that the Draft Plan calls for 50,000 fewer square feet of demolition than the GMPA 2000 Alternative, and not the 500,000 square feet on page 223 in the DEIS.
71.	223	Paragraph 6. Since long-term leasing of non-historic structures may proceed immediately after the PTIP adoption, certain non-historic structures may be quickly leased and become unavailable to the pool of non-historic buildings that could be considered for demolition as mitigation to offset adverse effects to the NHLD. The NPS recommends that long-term leasing be delayed until district planning is completed to avoid reducing the range of mitigation opportunities that could be applied to reduce potential impacts to the integrity of the NHLD.
72.	224	Paragraph 2, "…the Trust would ensure that new construction is compatible with the existing historic setting and that the integrity of the NHLD is not substantially impaired." This statement should be corrected to delete the word "substantially" as a qualifier for "impaired". There are no levels of "impairment" for the consideration of NHLD status.
73.	225	Paragraph 3. Findings of effect need to be based on a comparison with the No Action Alternative. The PTIP DEIS states "Because there would be more demolition than under the GMPA 2000 or Draft Plan alternatives, it is likely that there would be less rehabilitation occurring under the Resource Consolidation alternative. All rehabilitation would comply with the Secretary of the Interior's Standards for the Rehabilitation of Historic Properties, and thus would constitute a beneficial effect of the alternative." This paragraph should be reworded to conclude simply that demolition of historic buildings is an adverse effect and that rehabilitation of fewer buildings than the No Action Alternative is also an adverse effect.
74.	226 – 228 229 - 231	Since the Action Alternatives (except the Minimum Management Alternative) do not identify those structures to be removed nor what type and where new construction would occur, and given the amount of total allowable square footage of demolition and new construction, it must be concluded these alternatives have the potential for an adverse effect to the individual structures, the NHLD status and the cultural landscape.
75.	229	"Features identified as significant [to the cultural landscape] (Land and Community Associates, 1992) would generally be maintained or enhanced." This conclusion should have been preceded by a supporting assessment. Given the unspecified new construction and demolition, the conclusion that the cultural landscape would be generally enhanced is not supported. The citation is not in the DEIS Reference list. Enough specific information should be provided to demonstrate what would be maintained/enhanced and what would be changed. The effects should be compared to the GMPA 2000 Alternative.
76.	225/ 231	Paragraph 1 and page 231, CR-1. HABS or other recordation is not mitigation for removal; removal is not mitigatable.
77.	232	CR-4 should be corrected to state that additional planning would be required "for any project ~~proposing demolition or new construction~~ that could result in an ~~new~~ adverse effect on historic resources. This should not be limited to only demolition and new construction nor is there any reason to limit it to "new" adverse effects since the PTIP DEIS, due to the lack of information on the future of the NHLD, cannot mitigate the potential for adverse effect from the PTIP action alternatives.
78.	235	The DEIS states the impacts "could range from minimal to significant for both prehistoric and historic sites." This statement is unsubstantiated. If the impact could be anything, then the project has not been developed to the point where "the effects can be meaningfully evaluated" (40 CFR§1508.23).

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79.	236-237	The mitigation measures lack the important commitment to contact and consult with Native American tribal representatives early in the planning process for projects proposed for areas with potential for "pre-contact" cultural resources. The measures should also include the provision to halt further ground disturbance when "pre-contact" resources are encountered or discovered, contact tribal representatives and, if recommended by the tribes, arrange for consultation and possible monitoring prior to continuing with disturbance actions. Tribes that have expressed strong interest in the Presidio are listed in the NPS MOA for Crissy Field.
80.	241 242 243	Paragraphs 2 (241), 6 (242) and 3 (243). In three of the alternatives, one acre of important restoration area at Tennessee Hollow would be lost to a residential use designation. Since the Tennessee Hollow restoration planning is not yet completed, the full area that may be considered for the restoration of the creek, woodland, and prairie system should be protected from development at least until a plan has been completed that will ensure habitat connectivity and adequate hydrology for the system to function. In the DEIS the potential consequences of this change in designation are documented (e.g. pg. 241 "Residential use of this area would interfere with a planned buffer and habitat link with adjacent areas"). In a National Park context, the highest value should be the resources, with development opportunities considered in areas with lower resource values -- a principle generally followed in PTIP. The NPS recommends that any zoning change to "development" designations be delayed until Tennessee Hollow Restoration planning process can identify the area for potential restoration. If not, the DEIS should disclose what the project is that makes development here so necessary that impacts to the park resources cannot be avoided.
81.	241	More assessment should be focused on the potential impact to Crissy Marsh if the expansion doesn't take place. "…this alternative could result in an adverse impact to the health of the tidal salt marsh communities." This statement requires analysis to support an understanding of the degree of effect so that meaningful decisions can be made. The analysis should identify the benefits that expansion would provide to plants and wildlife and what the rarity of the tidal/wetland system of the GMPA 2000 Alternative is in the Bay Area. The expectation of the completed marsh should be described as part of the assessment of the GMPA 2000 Alternative. Then, each alternative that does not include restoration of the tidal prism would state that the benefits described in No Action would not occur, resulting in relatively significant adverse impacts to wildlife, plant life, etc.
82.	246	The DEIS states that "The more developed areas become, the less valuable they tend to be as wildlife habitat." This discussion should be expanded to address the degree to which this might happen, or the differences between alternatives. Construction impacts are temporary; however, the increased presence of humans, pets, noise, etc. could have an even more significant and permanent effect on wildlife species. The DEIS needs a further assessment of effect that considers visitor numbers, the kinds of recreation facilities and proximity to habitat, programming, interpretation and the location of new construction or demolition.
83.	252	Paragraph 1: It is not clear how the Resource Consolidation alternative would have the most beneficial effect on wildlife movement. This alternative has one less acre of native plant community than the no-action alternative and 300,000 more square feet of construction. The assessment should be more specific on the benefits accrued to wildlife and wildlife movement.
84.	256	Information is needed on 1) the timeline for the many native habitat restoration projects, 2) a standard for a minimum acreage to be restored annually and 2) the commitment to the resources needed to accomplish this goal, including collaboration with NPS.
85.	259	Mitigation Measure NR-12 requires that "disturbance to natural habitat areas will not <u>exceed</u> 20 acres within any given year." There is no reference to this measure in the impact assessment and the intent of the measure is not clear. Is the limitation proposed to address disturbance due to construction activities or for demolition-related disturbance or for native plant restoration activities? The DEIS should weave this mitigation measure into the discussion of effect it is intended to address.
86.	258	NR-7. Artificial Light. Delete the phase "where necessary" after "shield the use of artificial lighting". Other than for safety reasons (lights atop of towers), all lighting should be shielded in natural areas and in developed areas throughout the park.
87.	263	"Overall, the Resource Consolidation alternative would have the greatest beneficial effect on wetlands." This statement is not supported by the text. Additional information should be provided.
88.	264	The GMPA 2000 Alternative includes methods to conserve water, treat it, reroute storm draining, re-use waste water, etc. These elements of the GMPA 2000 Alternative should be assessed under Water Quality Impacts.
89.	265	The DEIS does not address the potential for adverse water quality impacts and biological impacts from pollutants in Area B runoff entering Crissy Field Marsh through the storm drain system. The NPS encourages the Trust to add, as mitigation, a systematic

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		program of storm drain water quality monitoring and a program to eliminate pollutant sources that could affect the marsh. Included in this mitigation would be an upgrade of the system servicing the area and the application of best management practices to minimize pollutants during any construction activities in the Crissy Field Marsh watershed.
90.	266	NR-18. The PTIP DEIS should provide more specifics regarding the valuation and accounting for compensating mitigation. The Trust should adopt a policy of "no loss of existing wetlands". The conditions that would permit the loss of existing wetlands should be explained further than "if not feasible". The replacement ratio for impacted wetland should be established in the DEIS if the "not feasible" trigger is reached. Strict monitoring standards for success should also be included.
91.	268	Paragraph 7. This section describes three locations in the Presidio, where, under the Draft Plan Alternative, new construction may be proposed. This information must be added to the description of the Draft Plan Alternative in the DEIS. Similarly, the areas of new construction should be described and shown for each alternative.
92.	270	Paragraph 2: Sustainable Community alternative. In the South Hills area, a 14-acre area, formerly housing, would be converted to 13 acres of landscape and 1 acre of native vegetation. The DEIS should explain why the entire area is proposed for restoration to native vegetation and explain the rationale for the proposed land use types.
93.	275	Table 36: The text should explain why a "Sustainable Community Alternative" has the worst air quality, highest noise levels and highest traffic levels.
94.	289	NR-25. Traffic Noise Monitoring and Attenuation. The NPS recommends adding monitoring in areas of high wildlife habitat value, and in natural areas used for quiet contemplation.
95.	292	The DEIS should identify which species would most likely be affected by noise or human presence and how the additional noise levels would affect these species.
96.	307	The lack of explanation of the methodology used in the Visitor Experience assessment prevents meaningful understanding of how the visitation numbers were derived. This seems key to many other analyses (traffic, cost-benefits, etc.) and could represent a major error repeated throughout the document.
97.	308 – 312	The assessment of effect to the visitor experience is inadequate. The EIS should address direct and indirect impacts to the visitor experience (including visitor perception of crowding) in both Areas A and B. As proposed in the Draft Plan, the Presidio's park-like character could be changed into a more urban experience, complete with hotels, shops, restaurants, offices, and increased traffic. The assessment of impact should include the potential effects of substantially increased visitation and the related traffic on the visitor experience at the Main Post, Crissy Field and elsewhere on the Presidio.
98.	308	Visitor Experience. The PTIP should specify that among the cultural institutions that could be accommodated on the Presidio is a Pacific Coast Immigration Museum. This Museum would interpret the history and issues associated with migration, immigration, and initial settlement that resulted in the peopling of the West Coast from aboriginal times up to present day. Initial feasibility studies by the NPS indicated strong interest and support and in-depth feasibility studies are scheduled for fall 2001.
99.	308 – 311 21	The visitation numbers presented on pages 308 – 311 do not conform to the visitation numbers presented in the Table 1 on page 21. The DEIS should explain which of these figures are correct and how the figures were derived.
100.	309	The EIS indicates the Resource Consolidation Alternative would "provide less variety of visitor facilities" than the GMPA 2000 alternative, but it would still result in nearly twice the number of recreational visitors as the GMPA 2000 alternative. Why is that? Same comment for Minimal Management which provides reduced basic interpretation and education programs, but still results in more than a million "extra" visitors per year.
101.	311	Paragraph 3: Minimum Management. The PTIP should state that, "…there will be ~~minimal additional~~ interpretive programs and ~~or~~ orientation signage installed". The Trust Act specifies that these decisions would be made by NPS, in cooperation with the Trust. The income generated by the Minimum Management Alternative should be sufficient to provide an annual support budget for visitor interpretation and programs.
102.	313	The range of recreational user groups described in the Affected Environment (p. 175) should be considered in the impact analysis.

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103.	315	The DEIS should explain why the level of demand for police services remains the same for the GMPA 2000 Alternative and Draft Plan Alternative when the latter has three times the visitation.
104.	330-332	The DEIS discussion on parking for each alternative is inadequate as indirect impacts to parking in Area A are not addressed.
105.	343	Mitigation Measure TR-18 states that the PTIP "would have an adverse impact on parking in Crissy Field". This conclusion of effect should be made in the assessment of parking impacts for each of the alternatives (pages 330-332). The assessment of effect should be based on the Crissy Field project as amended through the NEPA process, including Crissy Field EA/FONSI.
106.	343	Measure TR-18 places the responsibility of developing an effective mitigation program on the NPS. The NPS acknowledges the need to jointly develop a parking strategy for the Crissy Field area. To support this effort, the EIS should assess the potential effect of the Trust project and propose an effective and reasonable mitigation measure that the NPS could implement. This would not place the burden of research and development of the parking program on the Trust, the project proponent, rather than the NPS.
107.	345	Table 51: 4.6. Utilities. The DEIS should expand how the GMPA uses more water, and generates more wastewater, than the other more developed alternatives which have thousands more employees and residents.
108.	377	Paragraph 2: Add the $2 million annual budget for public programs to the discussion for the GMPA 2000 Alternative.
109.	378	Operating expenses are virtually the same for the GMPA 2000 Alternative and Draft Plan Alternative despite the additional staffing needed for the Preferred Alternative.
110.	383	Cumulative Impacts. The lack of the No Action Alternative makes the analysis very confusing as all alternatives are compared to current conditions not to the currently approved plan.
111.	383	The assessment of cumulative impacts to cultural resources and the integrity of the NHLD is inadequate. Comprehensive information on the future changes to the NHLD structures and landscapes by the PTIP is needed to be able to evaluate the PTIP in context with other related projects. A completed comprehensive management program as required by the Trust Act, would help develop an assessment of effect to the NHLD. Since the PTIP does not offer enough specificity to evaluate the effect to cultural resources, there is a potential for cumulative effect to the NHL leading to impairment and possible delisting.
112.	391	"Cumulative impacts on existing stream drainage and wetland resources are not expected to be adverse." Please clarify if this conclusion reflects potential effects from the Doyle Drive project.
113.	391	The cumulative impacts should be discussed for impacts to each resource area in each alternative, rather than lumped together. The reason for the separate approach is illustrated in the last paragraph in the Water Resources section on page 391. The analyst concludes there would be a cumulative beneficial impact on wetlands in all alternatives because of a net increase in wetland habitat and value. Although this may be true compared to existing conditions, this would not be true for all alternatives compared to No Action. There are differences between the cumulative impacts of each alternative that should be explained so they can be compared.
114.	401	Consultation under the NHPA. Please correct the text to show that the NPS has been consulting under the NHPA on this plan and other activities within the Presidio Trust jurisdiction.
115.	401	The Ohlone community has expressed an ongoing interest in the operations of the Presidio of San Francisco to the NPS and the Presidio Trust. This interest is not evident in the Plan, EIS, or Programmatic Agreement nor does it address the range of cultural resources laws related to native concerns.
116.	401	As we requested prior to publication, please replace the text describing Coordination with NPS with the following: "During the course of planning and the environmental review process leading up to the PTIP and Draft EIS, the Trust held regular meetings with the National Park Service to brief the NPS representatives on decisions that had been made regarding development of the Planning Principles and PTIP alternatives and to provide an opportunity for input and discussion."
117.	409	EO 11593. The text should describe the requirement of Section 110 of the NHPA to continue the evaluation of the cultural resources to determine whether they are historic and contribute to the NHL. This was done recently for Cold War-era structures as part of the Doyle Drive planning. The NHLD needs to be kept updated and it is now 8 years since the last update. Additional structures are now considered historic (50 years or older).