

ATTACHMENT

1

FINDING OF NO
SIGNIFICANT IMPACT

JAMES
CORNER
FIELD
OPERATIONS

1 FINDING OF NO SIGNIFICANT IMPACT

PROJECT PURPOSE & OVERALL VISION

The Presidio Trust, in consultation with the Golden Gate National Parks Conservancy and the National Park Service, Golden Gate National Recreation Area (NPS), is developing 14 acres of new parkland atop a dramatic bluff and at the base of the bluff extending from Lincoln Street to Mason Street in the Presidio of San Francisco (Presidio). The project, referred to as the Presidio Tunnel Tops (formerly New Presidio Parklands) has come about as the result of replacing Doyle Drive, the 75-year-old freeway leading to the Golden Gate Bridge, with the Presidio Parkway. The Presidio Parkway includes an at-grade, tunnel-covered roadway that reconnects the two most public spaces in the Presidio: the Main Post, the historic center of the Presidio, and the bay waterfront at Crissy Field. The Presidio Tunnel Tops will feature scenic overlooks, paths and gardens, a community plaza with food and services, a campfire circle and picnic grounds, and an interactive “learning landscape” where kids can explore nature. The project has the potential to become one of the most distinctive park sites in the country, welcoming a broad cross-section of local, national and international visitors to the Presidio. The project site is expected to offer a high quality park experience and provide visitor-serving amenities and activities necessary to welcome the public, enrich their visit, and encourage them to return. The project was foreseen in the Presidio Trust Management Plan (PTMP), the Trust’s land management plan for Area B.

The project will:

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

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

1-1












PREFERRED ALTERNATIVE

Alternative 3, as developed by James Corner Field Operations (JCFO) and modified by the project team with public input following the analysis in the October 2015 EA, is the Trust's "preferred alternative" (Figure 1-1 and Table 1-1). The preferred alternative has been modified slightly and differs from the proposed project analyzed in the October 2015 EA in that the Transit Center (Building 215) will be remodeled and no new building will be built on Graham Street.

- The preferred alternative will support a range of group sizes as well as programs and experiences, from individual pursuits and small gatherings to programs, in diverse landscapes and settings.
- Key elements include lawns, gardens and meadows; pathways for strolling; nooks for seating and small gatherings; picnic tables and barbeques; three overlooks; 41,101 square feet of building space and 54 parking spaces.
- The Anza Esplanade will be extended to connect the Main Post to a Central Overlook, which is a central viewing and gathering point.
- The Observation Post (Building 211) will be demolished and the Transit Center will be remodeled to include more restrooms, a reconfigured food service venue and covered outdoor seating.
- A new plaza will function as the main social and multi-functional arrival and gathering area between the Transit Center and the Presidio Visitor Center.
- A Cliff Walk will follow the edge of the embankment and connect visitors to the wider landscape. Along this walk, there will be three overlooks, designed with simple walls that will resemble both the historic batteries along the coast and recently constructed overlooks in the Presidio.
- A series of grassy terraces stepping down from the Central Overlook will offer extraordinary bridge views, provide space for gathering, orientation, interpretation and programming, and connect the Central Overlook to the landscape below.
- A fully accessible Bluff Walk will traverse the embankment and connect the bluff to Mason Street and the Learning Landscape, the outdoor component of the Youth Campus. Stairs near the West Overlook will also connect down to the Learning Landscape and Youth Campus.
- The Youth Campus will be east of the Learning Landscape and will include a renovated Crissy Field Center, new Field Station and Classroom buildings to house additional program space. The new buildings will be 3,380 square feet and 3,148 square feet, respectively.



FIGURE 1-1 PREFERRED ALTERNATIVE — PRESIDIO TUNNEL TOPS

ITEM	QTY UNIT	LEGEND KEY	PREFERRED ALTERNATIVE
			PRESIDIO TUNNEL TOPS
Total Built Space			32,807
<i>Existing Buildings¹</i>	Gross Square Feet		<i>35,573</i>
<i>Demolition</i>			<i>-9,294</i>
<i>New Building(s) - Youth Campus²</i>			<i>6,528</i>
Total Gathering Areas			5.5
<i>Hardscape³</i>	Acres		<i>4.2</i>
<i>Lawns</i>			<i>1.3</i>
Gardens	Acres		2.6
Predominantly Native Plantings⁴	Acres		4.4
Learning Landscape⁵	Acres		0.6
Paths⁶	Linear Feet		11,394
Overlooks	Number		4
Parking Spaces	Number		53

¹ Includes Buildings 201, 210, 211, 215 and 603.

² Includes the new Field Station and Classroom buildings adjacent to Building 603 (no single building would exceed 5,800 GSF).

³ Includes all paved area (plazas, terraces, overlooks, and paths), permeable paved areas (decomposed granite), and excludes Learning Landscape.

⁴ Includes bluff slope and native plantings in the Learning Landscape.

⁵ Includes all hardscape and paths within Learning Landscape, excludes native plantings

⁶ Includes new sidewalks along Mason, Lincoln, French Court and Graham.

TABLE 1-1 PREFERRED ALTERNATIVE — PRESIDIO TUNNEL TOPS

GOALS

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

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

OTHER ALTERNATIVES

In addition to Alternative 3, the following alternatives were considered in the EA analysis or eliminated from detailed study:

1-5

ALTERNATIVE 1 – PRESIDIO TRUST MANAGEMENT PLAN UPDATE

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

ALTERNATIVE 2 – PRESIDIO PARKWAY

The Presidio Parkway Alternative builds on the analysis contained in the Doyle Drive EIS/R and responds to the Doyle Drive Built Environment Treatment Plan and the Doyle Drive Architectural Criteria Report. The alternative would be an open and diverse landscape with differentiated areas that accommodate individuals, families, and groups of different sizes. The focal point of the alternative would be a large,

civic promontory that accommodates larger groups for events and programs as well as informal gatherings. A range of opportunities would be provided for interpretation and learning. A variety of paths would offer east/west and north/south access as well as different ways to traverse and scale the bluff. The Observation Post (Building 211) would be retained for special events and public uses. Building 201 would be moved to its permanent location on the west side of Halleck Street and rehabilitated by the Presidio Parkway project. Building 215 would remain the Transit Center. The Crissy Field Center (Building 603) would be retained for youth programming and the adjacent landscape would be largely native plants and lawn used for recreation and other purposes. Key elements of the Presidio Parkway Alternative include gardens, lawns, and native plantings; visitor-serving plaza, central promontory with group fire pit, and areas to gather and sit; areas for programming; 35,573 square feet of building spaces; and 87 parking spaces.

EXPAND CRISSY FIELD MARSH ALTERNATIVE

This alternative was eliminated from further study because marsh expansion in the project site would severely limit the area available for educational uses associated with the Crissy Field Center and Learning Landscape. Expanding these facilities would allow the number of youth educated on the site to be increased from the previous 23,000 per year to 50,000 to 60,000 per year, which supports the project goal to provide exceptional environmental learning opportunities. Reaching this goal requires new educational facilities and outdoor learning environments that fill the entire area at the base of the bluff.

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

REMOVE COMMISSARY (BUILDING 610) ALTERNATIVE

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

DISPOSITION OF SIGNIFICANT ENVIRONMENTAL EFFECTS

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

LAND USE CONSISTENCY

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

TRANSPORTATION

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

1-7

PARKING

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

VISITATION

The project will allow visitors to begin using a new area within the park. The project will improve connectivity to and between adjacent areas in the park, facilitate the visitor experience, and increase

opportunities for visitor understanding of the Presidio. The project site design will ensure that visitor use impacts are minimized, and management actions will be available to ensure that park resources are protected.

HISTORIC RESOURCES

The project will not have a direct or indirect adverse effect on the National Historic Landmark District. The project will result in a visible change to the landscape when viewed from contributing resources in the project area, due primarily to new construction, building rehabilitation and expansion and key project landscape elements. However, conformance with applicable guidelines and planning documents will ensure that the design and construction of the buildings are consistent with the Secretary's Standards, resulting in a new structure or structures that are compatible with the character defining features of the NHL and its contributing resources, including the setting and feeling of the NHL in the project area. The key landscape features will be compatible with the established design criteria and will therefore enhance the qualities and characteristics of the project area and the NHL as a whole.

ARCHAEOLOGICAL RESOURCES

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

VISUAL RESOURCES

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

LIGHT AND GLARE

The project will minimize light pollution. Code-required lights will be high efficiency, low glare, downcast and shielded fixtures per the current California Building Energy Efficiency Standards California and LEED requirements for new exterior lighting. Site and parking lot lighting will be installed following the same principal concerns as building and path of travel lighting. The Trust will review both the interior

and exterior lighting designs to ensure consistency with PTMP policies regarding light and with guiding principles set forth in Trust standard measures for lighting. Best lighting practices will be reviewed to avoid light trespass into adjacent natural areas.

BIOLOGICAL RESOURCES

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

WATER RESOURCES

The project's water demand will increase the Presidio's annual consumption by an insignificant amount (approximately 1.3 percent). Landscapes will be planned, designed, installed, managed and maintained to promote the conservation and efficient use of water and to prevent the waste of this valuable resource. Water irrigation systems will allow for the future use of recycled water. Stormwater management practices will be integrated into the landscape and grading design plans to minimize runoff and to increase on-site rainwater retention. Multiple best management practices will be used to control erosion and prevent sediment from entering Crissy Field Marsh and the San Francisco Bay.

1-9

ENVIRONMENTAL SUSTAINABILITY AND CLIMATE PREPAREDNESS

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

HAZARDOUS SUBSTANCES

The project will have no significant impacts to human health, safety and the environment due to hazardous substances because the risk of human exposure is low and precautionary measures will be implemented as necessary. Implementation of new site uses and soil disturbing construction in the Commissary/PX Land Use Control (LUC) area as part of the project will be subject to regulatory approval of planned land use changes and remedial actions (as required) in advance of construction. Should the land use include ecologic habitat and facilities considered sensitive uses, additional remediation to

remove and/or cap contaminated soil will ensure protection of human health and the environment. For areas where the LUC will remain in effect, the Trust will continue annual monitoring and reporting.

CUMULATIVE IMPACTS

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

1-10

PUBLIC INVOLVEMENT

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

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

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

Comment letters are available for review at the Presidio Trust and constitute part of the formal public record.

The Trust fully assessed all issues raised by the comments received during the review period. In response to the comments, the Trust affirms it will:

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

1-11

¹ Comments submitted by the National Park Service and the State Historic Preservation Officer (SHPO) on the preliminary finding of effect (Attachment 2 of the EA) and the supplemental design guidelines (Attachment 4 of the EA) were addressed as part of the National Historic Preservation Act Section 106 consultation process. The NPS and SHPO letters are provided in Attachment 3 of the EA.

A summary of and responses to the comments received during the public review period for the EA are provided in Attachment 6 of the EA. Minor text changes and revisions to the EA in response to the comments are provided in errata sheets in Attachment 7 of the EA.

AGENCY REVIEW

The Trust coordinated with the following agencies for their review of the project and to ensure compliance with any substantive environmental requirements, including consultation under the National Historic Preservation Act.

NATIONAL PARK SERVICE

As the manager of the adjacent parkland at Crissy Field and as a partner in interpretation, visitor services and programming for the Presidio at large, the National Park Service (NPS) was invited to collaborate closely on the project with the Trust from the outset. In its scoping letter to the Trust (NPS 2015), the NPS acknowledged the Trust's "widespread, thoughtful public engagement and outreach" and responsiveness to the "depth of public comment and input received." The NPS letter also:

- Supported the concepts being explored for the Presidio Visitor Center design for Building 210, and for expanding the Crissy Field Center and creating the Learning Landscape.
- Requested the effects on visual resources, visitation, water resources, transportation and parking, dark night sky, and climate change adaptation be addressed in the EA (refer to Section 4 in response).
- Supported the removal of Building 211 (Observation Post) and Building 610 (Sports Basement) as soon as possible.
- Expressed concern over the potential effect on access to and parking demand in Crissy Field (Area A) due to Trust projects.
- Informed the Trust of the planning process underway for "refreshing" (i.e., repairing and improving) Crissy Field (Area A).

Following its review of the EA, the NPS submitted comments requesting additional explanation and analysis with regard to visitation, transportation and natural resources (NPS 2016a). The NPS applauded the Trust on its "exemplary planning process" for the project and expressed confidence that its comments would be resolved in the FONSI, during follow-on design, and through continued collaboration. Responses to the NPS comments on the EA are provided in Attachment 6 of the EA.

PTPA SIGNATORY PARTIES

Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires the Trust to take into account the effect of its undertakings on historic and cultural resources, including the Presidio National Historic Landmark District (NHL). As a result of the consultation for the PTMP, the Trust entered into a Programmatic Agreement, which was updated in 2014 (PTPA) (Trust 2014a), with the SHPO, the ACHP and the NPS (signatory parties). The PTPA provides a framework for reviewing different types of projects, and for consulting with other parties under certain circumstances. Following initiation of public scoping, the SHPO (Beason 2015) requested a list of contributing/non-contributing structures in the proposed area of potential effect (APE) and clarification on the locations of the Anza Esplanade and Presidio Promenade. The NPS issued a letter (NPS n.d.) that offered some detailed design comments on each of the preliminary concepts and the alternatives, as well as recommendations on projects to consider for the cumulative effects analysis. The Trust gave serious consideration to the comments by modifying the concept design and focusing the EA and preliminary finding of effect (FOE) analyses in response. Prior to circulating the EA and FOE, the Trust also forwarded the supplemental design guidelines to the signatory parties for their review and conducted outreach to Native American contacts that may be interested in the project.

In their comment letters on the FOE and the supplemental design guidelines (NPS 2016b and Office of Historic Preservation 2016a), the NPS and SHPO stated they did not concur with the Trust's preliminary finding of no adverse effect for the project. The NPS asked the Trust to modify the amphitheater and to provide more guidance for the structures in the Learning Landscape to ensure avoidance of adverse effect. The SHPO raised a number of concerns, including the appropriateness of the new plaza and the scale of other design elements within the landscape. The Trust followed up with the NPS and SHPO to resolve the outstanding issues and reached consensus on its finding of no adverse effect. The referenced NPS and SHPO emails and letters to the Trust and the Trust's conditional finding of no adverse effect letter (Trust 2017b) are provided in Attachment 3 of the EA.

1-13

PRESIDIO PARKWAY IMPLEMENTATION AGENCIES

The Trust provided copies of the EA to the three key regional transportation agencies for the Presidio Parkway project: the San Francisco County Transportation Agency, the Federal Highway Administration, and the California Department of Transportation.

No other Federal, State or local agencies chose to participate in the environmental review process for the project.

MITIGATION MEASURES TO AVOID OR MINIMIZE POTENTIAL ADVERSE ENVIRONMENTAL IMPACTS

The Trust commits to carrying out all practicable mitigation measures identified in the EA to avoid or minimize environmental impacts that could result from constructing the project. The mitigation measures are discussed in detail at the beginning of Section 4 (Environmental Consequences) and include all relevant avoidance, minimization, and/or mitigation measures adapted from the Doyle Drive, PTMP and Main Post Update Records of Decision (RODs), and measures informed by the EA review process and considered for impacts that by themselves were not considered significant. Mitigation measures include elements which will be integral components of the project's design, continued coordination with other public agencies as warranted, implementation of standardized best management practices during and following construction, and other possible efforts. As part of the decision to construct the project, the Trust will adopt a monitoring and enforcement program (MEP) provided in Attachment 8 of the EA to ensure that mitigation commitments are implemented. The Trust's Project Manager will be responsible for monitoring compliance with the MEP and the effectiveness of mitigation commitments. The status and results of mitigation monitoring will be made available to other agencies and the public upon request.


1-14

FINDING

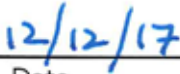
The Trust has considered the information and analyses in the environmental assessment and supporting environmental documentation, the comments of agencies and the public, and the project's administrative record. Based on Trust regulations on environmental quality (36 CFR 1010), PTMP policies, monitoring, and experience, including prior significance determinations documented in previous NEPA decisions and the adoption of enforceable mitigation measures outlined in the EA, it is the determination of the Trust that the project is not a major federal action having the potential to significantly affect the quality of the human environment. There are no significant direct, indirect or cumulative effects on public health or safety, sites listed on the National Register of Historic Places, or other unique characteristics of the project area, with the exception of cumulative transportation impacts, which will be mitigated below significant levels. The project is neither scientifically nor publicly controversial. Implementation of the project will not involve unique or unknown risks, cause loss or destruction of noteworthy park resources, or violate any Federal, State or local law. Implementation of the project is not precedent-setting nor will it automatically trigger other actions which may require environmental impact statements. Through the NHPA Section 106 process to include the parameters of the Conditional Finding of No Adverse Effect (Trust 2017b), and in accordance with Section 110 of the NHPA, the Trust has, to the maximum extent possible, undertaken such planning and actions as may be necessary to minimize harm to the landmark. The project is fully consistent with the BCDC's enforceable policies. Therefore, in accordance with the

National Environmental Policy Act of 1969 and regulations of the Council on Environmental Quality, an environmental impact statement will not be prepared. The Trust will implement the project, construction of the Presidio Tunnel Tops, at the earliest possible time.

RECOMMENDED:




John Pelka
Compliance Manager, Presidio Trust

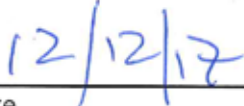


Date

APPROVED:



Jean Fraser
Chief Executive Officer, Presidio Trust



Date