

pedestrian and bicycle facilities); relocation; environmental justice; and visual quality. Detailed information about these resources can be found in their corresponding technical reports which were prepared for this project.

### 3.2.1 Land Use and Planning

The land use resource area discussion consists of an overview of existing land uses and development within the project study area as well as a summary of relevant plans and policies.

#### *Regulatory Setting*

Both state and federal regulations govern the review and analysis of land use. These regulations are:

- *National Environmental Policy Act of 1969 (NEPA)* – requires all Federal agencies to assess the environmental impacts of proposed projects and disclose the impacts of the project to the public in order to promote efforts which will prevent or eliminate damage to the environment. The President’s Council on Environmental Quality was established to oversee NEPA for all Federal agencies. Following the guidelines of NEPA, this analysis has been prepared in order to document the impacts of the proposed project on the environment.
- *California Environmental Quality Act of 1970 (CEQA)* – requires California public agencies to identify the significant environmental effects of their actions, and either avoid or mitigate them, where feasible. This analysis has been prepared following CEQA guidelines in order to document the potential impacts of the project on the environment.

#### Exhibit 3-1 Environmental and Community Resources

<i>HUMAN ENVIRONMENT</i>
<ul style="list-style-type: none"> <li>-- Land Use</li> <li>-- Parks and Recreation</li> <li>-- Growth</li> <li>-- Community Impacts</li> <li>-- Relocation</li> <li>-- Environmental Justice</li> <li>-- Traffic and Transportation</li> <li>-- Visual and Aesthetics</li> <li>-- Cultural Resources</li> </ul>
<i>PHYSICAL ENVIRONMENT</i>
<ul style="list-style-type: none"> <li>-- Hydrology, Water Quality, and Stormwater</li> <li>-- Geology/Soils/Seismic/Topography</li> <li>-- Hazardous Waste/Materials</li> <li>-- Air Quality</li> <li>-- Noise and Vibration</li> <li>-- Energy</li> </ul>
<i>BIOLOGICAL ENVIRONMENT</i>
<ul style="list-style-type: none"> <li>-- Natural Communities</li> <li>-- Wetlands and other Waters of the United States</li> <li>-- Plant Species</li> <li>-- Animal Species</li> <li>-- Invasive Species</li> </ul>

### ***Affected Environment***

The study area for the land use includes the footprint of all project alternatives plus construction staging areas, equipment storage areas, and temporary detour routes in the Presidio and portions of adjacent neighborhoods.

The project study area consists of the Presidio and a number of adjacent San Francisco neighborhoods. These include the Marina district (west of Broderick Street), which includes the Palace of Fine Arts/Exploratorium area; the Lombard Street corridor (between Chestnut and Greenwich Streets), and Cow Hollow (north of Greenwich Street and west of Broderick Street). The Marina Green, Saint Francis Yacht Club and promenade along Marina Boulevard have important recreational uses in the area adjacent to the project study area. Adjacent to the Presidio, ground floor commercial uses are located along Lombard Street and Lyon Street (between Lombard Street and Greenwich Street). The remaining adjoining land uses are primarily residential.

The inventory of existing land uses was based primarily on information provided in the *Presidio Trust Management Plan* (PTMP). The analysis of land use impact primarily focused on the effects to buildings and parking within the Presidio and the potential effects to the existing and future land use patterns of the designated planning areas.

#### **Presidio Planning Areas and Land Use**

The Presidio, under the direction of the National Park Service (NPS) (Area A - coastal) and the Presidio Trust (Area B – interior), has been converted from an active U.S. Army military post to a national park. The buildings within the Presidio, which are part of a National Historic Landmark District (NHLD), reveal a number of architectural styles, ranging from brick Colonial Revival to stucco Mission Revival to wood-frame temporary barracks. Throughout the years, many of the buildings have supported different types of uses as the needs of the Army changed. Now that the Presidio is a national park, many buildings are being rehabilitated to support civilian uses, thus changing the land uses.

The Presidio is comprised of approximately 603 hectares (1,490 acres) with 473 hectares (1,168 acres) in Area B, and 131 hectares (323 acres) in Area A. Land use within Area B is predominately open space (281 hectares [695 acres]), which includes forest, landscaped areas, wetlands, trails, and the Presidio Golf Course. Approximately 191 hectares (473 acres) of Area B are developed land.

The area defined by the temporary construction limits includes four of the seven planning areas outlined in the PTMP: Crissy Field (Area B); Letterman; Main Post; and Fort Scott (see **Exhibit 3-2** on the following pages).

The aforementioned areas contain the following categories described in the PTMP (see **Exhibit 3-3** on the following pages):

- Mixed-use/Visitor (Community Focus) – includes a mix of uses devoted to public uses such as museums, small-scale lodging and visitor amenities;

- Mixed-use/Office/Residential – includes a mix of office, warehouse and storage facilities in addition to residences;
- Mixed-use/Visitor (Cultural (Art) Focus) – includes uses such as educational centers, performing arts facilities, training facilities, and interpretation sites;
- Residential – includes buildings used for housing including, single-family houses, duplexes, apartment complexes, and dormitories;
- Infrastructure – includes utilities and facilities necessary for operation of the Presidio; and
- Open Space/Natural Areas – includes native plant communities, forest, landscape vegetation and disturbed areas.

Four of the main PTMP planning areas and Area A in the Presidio, include the above listed land uses.

### **Crissy Field**

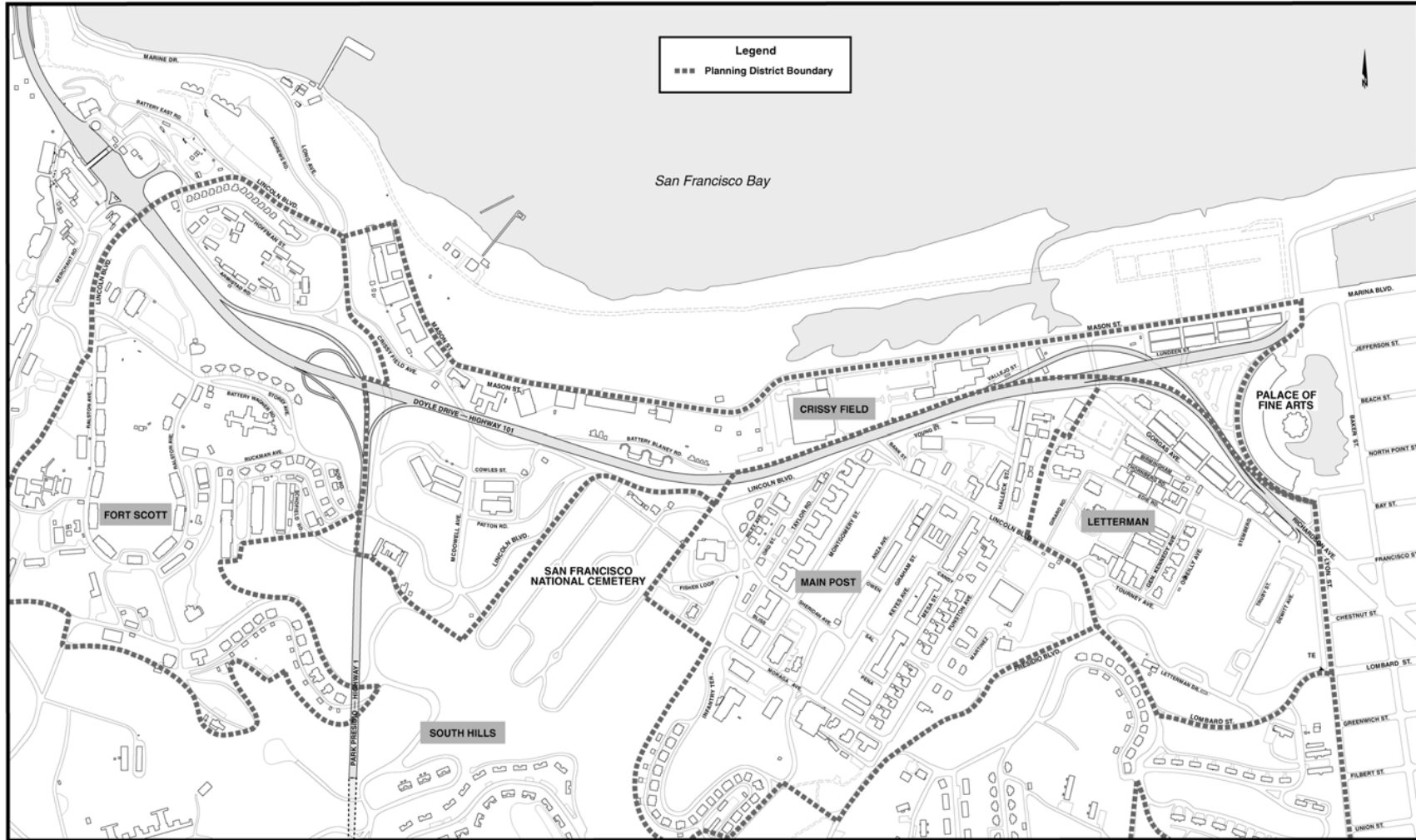
The Crissy Field planning area encompasses approximately forty-one hectares (102 acres) and includes the area between Mason Street, Doyle Drive and Lincoln Boulevard. The diverse natural habitats of Crissy Field include bluffs, dunes, grassy areas, and marsh. The area includes dense forest and native plant communities such as bluff scrub, coastal scrub, live oak woodland and serpentine scrub. There are approximately forty buildings located in the area that is designated as a recreation, educational destination in the PTMP.

### **Letterman**

The approximately twenty-four hectares (sixty acres) Letterman planning area is located just west of the historic Lombard Gate entrance to the Presidio. It is designated as a mixed-use residential and working campus. In early 2002, the Letterman Army Medical Center and Letterman Army Institute of Research buildings were demolished for the construction of the Letterman Digital Arts Center, home of Lucasfilm's subsidiary companies.

The Letterman Digital Arts Center is an office campus consisting of new buildings comprising approximately 78,968 square meters (850,000 square feet) of space in the eastern portion of the planning area. The Digital Arts Center is engaged in research, development and production of digital arts and technologies for use in entertainment, education, communications, and other industries. Also included on the site is an underground garage for approximately 1,500 vehicles, as well as landscaped open space/public garden available for use by park visitors, employees of the Digital Arts Center, other Presidio tenants, and area residents. The area to the west of the Digital Arts Center includes historic buildings and cultural landscape features. It also includes office, residential and some supporting non-residential uses. The Tennessee Hollow forms the western edge of the area.

### Exhibit 3-2 Presidio Planning Areas



Source: Presidio Trust Management Plan, 2002.

## **Main Post**

The Main Post planning area encompasses approximately forty-nine hectares (120 acres) and is located west of the Letterman planning area. Doyle Drive is its northern boundary. The area was historically the center of activity in the Presidio. Many of its 138 buildings are historic. The Main Post is the center of visitor activities, and the NPS Visitor Center and the Trust offices are located in this area. The PTMP designated the Main Post to continue in its role as both a visitor and community center for the Presidio. Preferred land uses in the planning area include office, educational, residential and lodging, service retail, and recreation.

One of the Presidio's primary watersheds is Tennessee Hollow. It runs through the Main Post planning area and feeds the restored Crissy Marsh. The GMPA and PTMP recommend that surface drainage and native riparian habitat be re-established within this watershed.

## **Fort Scott**

The Fort Scott planning area is located west of the Park Presidio interchange and extends west to Lincoln Boulevard along the border with Area A. The planning area is approximately fifty-three hectares (132 acres) and contains 157 buildings, most of which are historic. The mature canopy forest along the perimeter of the area provides habitat for raptors, migratory songbirds and other bird species. Dragonfly Creek is the only major remnant natural system in the Fort Scott area. In addition, the area contains a variety of historic landscape features such as formal gardens, walkways, vistas, retaining walls, and horticulture plantings. Based on the peaceful setting of Fort Scott, the PTMP has designated the area as ideal for education, conferences, and research with supporting lodging, housing and offices.

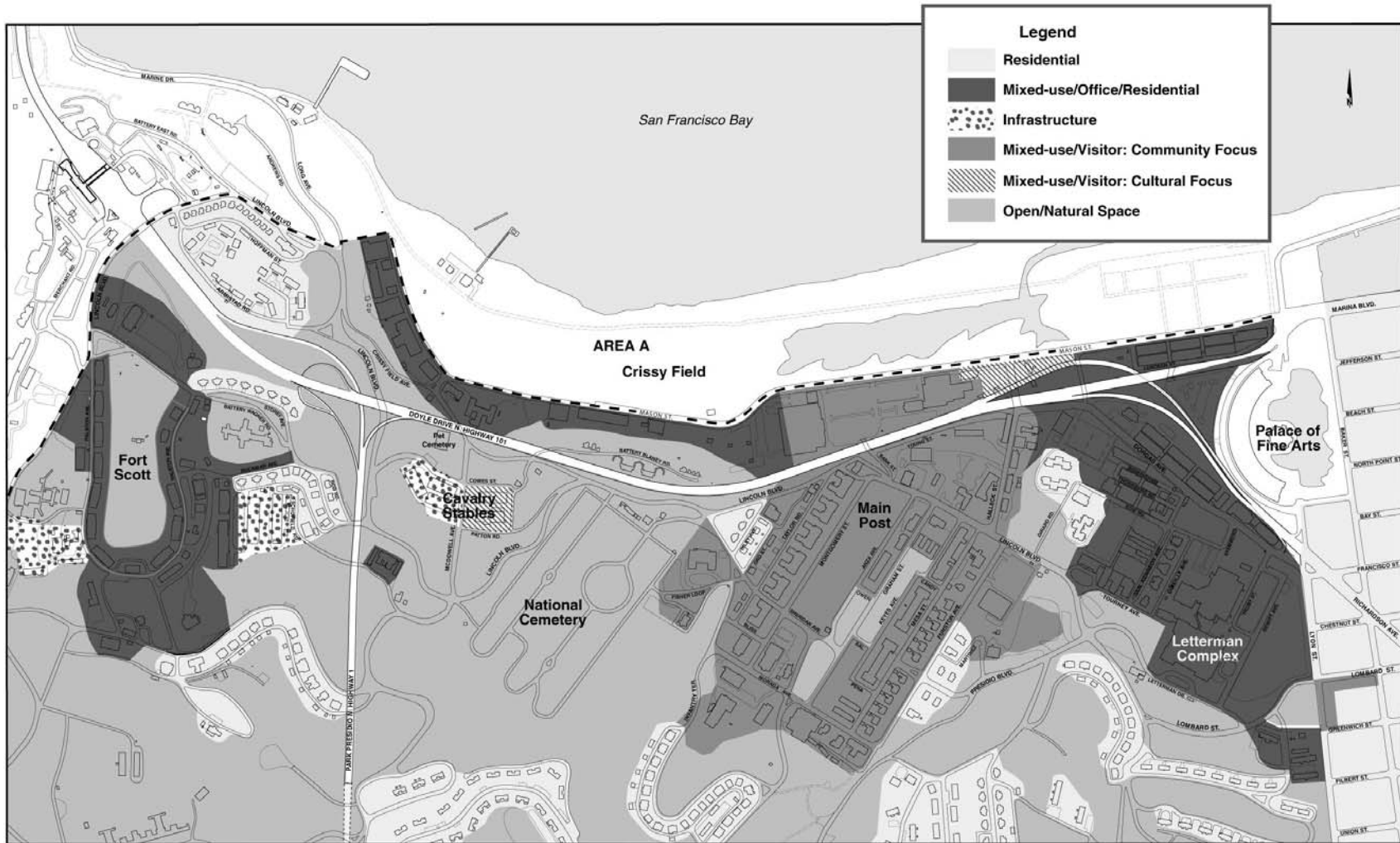
## **Area A**

The coastal region of the Presidio is designated as Area A and it is under the management of the NPS. Several distinctive features are located within the 131 hectares (323 acres) that comprise Area A, including Crissy Field, Crissy Marsh, Fort Point, and historic batteries.

## **Development Trends**

The Presidio became part of the Golden Gate National Recreation Area (GGNRA) in 1994 when the U.S. Army transferred jurisdiction of the park to the NPS. Since 1998, the park has been managed by both the NPS, which oversee Area A (coastal), and the Trust, which manage Area B (interior). While the two agencies have jurisdiction over separate areas of the Presidio, they engage in many cooperative programs. Under the GMPA wetlands and natural riparian corridors have been restored including Crissy Marsh. Under guidance of the PTMP many historic buildings have been rehabilitated and adapted for civilian uses. Visitor and public safety services have been established throughout

### Exhibit 3-3 Existing Land Use



Source: Presidio Trust Management Plan, 2002.

the park. In addition, numerous preservation and rehabilitation efforts for native plant communities, historic forest zones and landscaped vegetation areas have taken place under the guidance of the PTMP. In addition to the recent completion of the Letterman Digital Arts Center on the site of the former Letterman Hospital; current development activities include: construction of the Richardson Avenue slip ramp, which provides access into the Presidio at Gorgas Avenue from westbound Richardson Avenue; construction of a transit center along Lincoln Boulevard adjacent the Post Office (Building 210); on-going building rehabilitation; and initial studies for the restoration of the Tennessee Hollow riparian corridor and possible expansion of Crissy Marsh. Riparian corridor restoration is proceeding in an area located between Doyle Drive and Lincoln Boulevard and Halleck Street and Girard Road. This is the site of a former Army era landfill (Fill Site 6A) which was placed over the historic alignment of the Tennessee Hollow watershed which flowed in a culvert under the landfill. Following the removal of the landfill, the culvert in this area has been removed and the creek was daylighted to return to its natural setting with a mix of native riparian and upland habitat. Ongoing planting efforts are continuing in this newly restored riparian corridor. This site is part of the Tennessee Hollow watershed and ultimately drains to Crissy Marsh.

Under the PTMP, the Presidio will remain primarily open space with its natural, historic, scenic, and recreational resources preserved for public use and enjoyment. Open space will be increased by approximately 40.5 hectares (one hundred acres) and building space will be decreased over time, primarily by removing non-historic housing in the southern portion of the park. The natural environment will be enhanced, remnant systems preserved and expanded, native plant and wildlife species protected, the historic forest preserved and rehabilitated, and streambed corridors enhanced or restored. Recreational resources and visitor experience opportunities would be enhanced. The total building area in the park would be reduced by approximately 33,445 square meters (360,000 square feet) or more, from the 553,702 (5.96 million square feet) that currently exist to 520,257 square meters (5.6 million square feet) or less.

Nearly one-third of the building space would be set aside for public uses such as visitor centers, lodging, and educational uses. The integrity and historic character of the NHLD would be protected, though over time limited changes in keeping with the park's character would occur. Historic buildings and landscapes that distinguish the NHLD would be rehabilitated and adaptively used. Some new construction would occur, limited to developed areas and compatible with existing structures, to facilitate the rehabilitation and reuse of historic buildings, and to meet other park objectives, including replacement of housing removed to expand open space. Housing demand would be monitored and the supply of housing would not exceed the current count of about 1,650 units. An improved mix of housing types would be achieved through subdivision and conversion of existing buildings, and potential new construction.

## Plans and Policies

This section describes the existing plans and policies that pertain to the Doyle Drive Project study area.

### **Final General Management Plan Amendment (GMPA) and Environmental Impact Statement (1994)**

The National Park Service developed the GMPA for the Golden Gate National Recreation Area in the late 1970s to guide overall management of the park in keeping with its legislative purpose and the legal and administrative mandates of the NPS. The Final GMPA was approved in 1994 and provides guidelines for management, use and development of Area A of the Presidio. While the Doyle Drive project lies entirely within Area B managed by the Trust under the *Presidio Trust Management Plan* (see below), the GMPA, when adopted in 1994 as the NPS plan for the entire Presidio (Areas A and B), considered a future Doyle Drive project. The GMPA laid out several objectives specifically related to a future Doyle Drive, including:

- Redesign the Doyle Drive corridor as a parkway rather than a freeway
- Respect the Presidio's status as a national historic landmark district in redesign options
- Minimize the effects of noise and other pollution from the parkway on natural areas and recreational qualities at Crissy Field and other areas adjacent to the highway
- Improve the Presidio entrance and circulation features as part of the Doyle Drive redesign
- Maintain the functions that the Doyle Drive corridor serves as part of the regional and city transportation network.

### **Presidio Trust Management Plan (PTMP): Land Use Policies for Area B of the Presidio of San Francisco (2002)**

The PTMP succeeds the GMPA as it applies to Area B, the jurisdiction under the Presidio Trust. The PTMP provides an updated policy framework that balances and conforms the concepts and principles of the GMPA with the superseding statutory requirements and mandates of the Presidio Trust Act (16 U.S.C. § 460bb). The PTMP sets forth land use preferences and development guidelines for seven planning districts. Building on the elements of the GMPA, the PTMP is concerned with improving open space, maintaining compact development patterns, reuse of historic buildings, increasing the diversity of the housing supply, allocating building space for educational activities, and supporting sustainable transportation and infrastructure systems in Area B of the Presidio.



The PTMP provides a set of objectives that would be used to evaluate potential conflicts with the Doyle Drive design alternatives including:

- Minimize short-term and long-term impacts on park resources;
- Provide direct access to the Presidio and ensure an appropriate transition between the Doyle Drive roadway west of the Gorgas Avenue warehouses and city streets, using a minimum amount of park land;
- Maintain Halleck Street as a pedestrian and bicycle route with limited vehicular use;
- Enhance visual and pedestrian connections from the Main Post to Crissy Field; and
- Ensure a viable connection for the Tennessee Hollow drainage to Crissy Marsh.

In addition, each of the planning districts outlined in the PTMP include specific guidelines for incorporation with a reconstruction of Doyle Drive.

- The Letterman District guidelines propose a new entrance from Doyle Drive into the park should be created. The compatibly designed new entrance from Doyle Drive should serve as the main vehicular entry for tenants and visitors to the Letterman complex. In addition, Gorgas Avenue should serve as a link to Crissy Filed and as access for the Letterman complex
- The guidelines for the Main Post include a call for incorporating an open space connection between the Main Post and Crissy Field as part of the planning for reconstruction of Doyle Drive, improved pedestrian and visual connections between the two areas, and reinforcing the historic connection along Halleck Street.
- The guidelines for the Crissy Field district also include creation of safe and inviting open space connections between the Main Post and Crissy Field as part of a Doyle Drive reconstruction. The guidelines suggest that Doyle Drive should be reconstructed to preserve views to and from the bluffs and Main Post, and maximize views along Halleck Street, Tennessee Hollow, and from the Cavalry Stables. In addition, the guidelines propose reuse of the Commissary (Building 610) as museum space while protecting and restoring the ecological communities on the western bluffs.

### **Doyle Drive Task Force Report (1993)**

The *Report of the Doyle Drive Task Force to the San Francisco Board of Supervisors: A Scenic Parkway for the Park* identified a concept for a scenic parkway through the Presidio. The parkway concept envisioned three travel lanes in each direction with an additional eastbound auxiliary lane between the San Francisco exit of Veterans Boulevard and a new direct access point to the Presidio. The major elements discussed include, improved views within the Presidio, improved access

to the Presidio, and improved safety and amenities. The report presented over thirty recommendations for Doyle Drive including:

- 3.6-meter (12-foot) wide traffic lanes, with 2.4-meter (8-foot) wide shoulders on the right side in each direction;
- provide three continuous lanes in each direction between Highway 1 and the split to Richardson Avenue;
- include a fixed center barrier;
- provide direct access between the Presidio and Doyle Drive;
- encourage the use of tunnels and cut-and-cover to mitigate adverse impacts; and
- design to maximize views for motorists, park users, and from nearby neighborhoods.

### **Presidio Trails and Bikeways Master Plan/Environmental Assessment (2003)**

The *Presidio Trails and Bikeways Plan & Environmental Assessment* is the guide for directing the establishment of a network of trails and bikeways which would enhance the public's exploration and experience of the Presidio while also protecting its natural and cultural resources. The plan identifies three basic trail classifications, pedestrian trails, multi-use trails and on-street bikeways. The five principal goals of the plan include:

- enhance public use, access and experience;
- support resource preservation;
- contribute to a comprehensive transportation strategy;
- provide for sustainable design and construction; and
- promote ongoing public involvement through volunteer stewardship.

Proposed trail and bikeway connections that may be affected by the Doyle Drive Project include the Presidio Promenade, the Park Boulevard Trail and the Tennessee Hollow Corridor.

### **Presidio of San Francisco Vegetation Management Plan (VMP) and Environmental Assessment (1999)**

The *Presidio of San Francisco Vegetation Management Plan and Environmental Assessment* (VMP) was prepared in July 1999 to serve as a guide for all the organizations operating within the Presidio and their management of vegetation resources. It is designed to protect and enhance the natural and historical significance of vegetation resources of three broadly defined vegetation categories: native plant communities, historic forest, and landscape vegetation. The VMP includes three Presidio-wide objectives:

- Increase open space to enhance park values and improve the Presidio's natural and recreational qualities;

- Identify and protect sensitive wildlife species, and restore and maintain their habitats; and
- Manage onsite water resources to protect groundwater and surface water resources and natural wetland and riparian values and to efficiently supply water to the Presidio community.

In addition to the Presidio-wide objectives, specific objectives are provided for the management of each of the vegetation categories. Some of these objectives include:

- Protect and enhance wildlife habitat by expanding habitat for native plants, increase native species and habitat diversity, avoid invasive plant removal in areas of high wildlife value, and avoid disturbance to wildlife habitat during critical times of the year;
- Maintain the forest within the historic forest management zone as a significant historic landscape feature;
- Manage the forest to maintain important visual connections; and
- Retain existing historic landscapes and historic plants whenever feasible.

### **San Francisco Bay Plan (2003)**

The San Francisco Bay Conservation and Development Commission (BCDC) is a state agency with the authority to issue or deny permit applications for placing fill, extracting materials, or changing the use of any land, water, or structure within the San Francisco Bay. The *San Francisco Bay Plan*, adopted in 1968 by BCDC and last amended in 2003, includes the policies to guide future uses of the Bay and shoreline and includes a set of maps which show where the policies should apply to the present Bay and shoreline. Bay Policy 5c highlights the policies for Bayfront military installations designated as waterfront parks which includes the Presidio. The policy states that these installations should be developed and managed for recreation uses to the maximum practicable extent consistent with the Bay Plan Map Policies.

The Presidio is designated a waterfront park, beach priority use area in the San Francisco Bay Plan Map 4, Central Bay North. Included with Plan Map 4 are two policies specifically directed at the Presidio: Policy 27 states that the area of the Presidio within the jurisdiction of the NPS should be developed and managed for open space and water-oriented recreational use. The policy also states that Crissy Field marsh should be protected in addition to evaluating the possible need for expansion and improvement to the marsh while preserving cultural resources and recreation use. Policy 28 states that development within the Presidio Area B should be consistent with policy 5-c as called for in the Trust's management plan. The policy specifically states that "alterations to Doyle Drive should preserve recreation opportunities within the waterfront park priority use area and preserve existing natural and cultural values or their restoration potential" (BCDC, 2003).

### **San Francisco General Plan (1996)**

The *San Francisco General Plan* establishes general land use goals and objectives for development in the City, but excludes the Presidio, and prescribes policies as steps for achieving the objectives. Although the Presidio is under exclusive Federal jurisdiction and not under jurisdiction of the City, the NPS and Trust seek to minimize possible conflicts between Federal activities and City policies, and consult with the City to achieve consistency wherever possible. While lacking jurisdiction, the City Planning Commission may review proposals and advise the Presidio on matters of mutual interest.

### **Building Restoration Phase IIB and III, Palace of Fine Arts (2003)**

The Phase IIB and III plan is a full architectural survey and structural analysis of the existing conditions of the Rotunda and Colonnade of the Palace of Fine Arts. In addition the plan provided preliminary plans for landscape improvements for the Palace grounds. Part of these improvements included new entry dropoff/turnarounds at both the north and south ends of Palace Drive.

### ***Temporary Impacts***

Temporary impacts are a result of short term construction activities within the project study area. These are presented on the following page(s). There are no temporary impacts on plans and policies. Please refer to the Relocation and Parking sections for further discussion of impacts related to those areas.

### **Alternative 1: No-Build**

Under the No-Build Alternative, no temporary impacts would result.

### **Alternative 2: Replace and Widen**

Within the Crissy Field planning area, construction staging would require the use of the parking lot of the Post Exchange and Commissary for the Replace and Widen Alternative – No-Detour while the Detour Option would also require the removal of both the Post Exchange (Buildings 605 and 606) and Commissary (Buildings 610 and 653). Additionally, the Detour Option would require the temporary removal of four Mason Street warehouses (Buildings 1182, 1183, 1184, and 1185). The removal of these buildings and parking areas would temporarily reduce the available parking and reduce the facilities available for providing uses compatible with the recreational goals in the Crissy Field planning area resulting in a temporary impact to the land use of this area.

Construction staging would also be required with the limits of the Letterman planning area. Staging would require the temporary use of the parking lot between Buildings 230 and 1063. Access to adjacent buildings would be maintained throughout the construction period. This temporary use of the

parking area would not impact the overall land use or development pattern of the Letterman planning area.

#### **Alternative 5: Presidio Parkway**

Similar to the Replace and Widen Alternative, the Presidio Parkway Alternative would require construction staging sites in both the Crissy Field and Letterman planning areas. Within the Crissy Field planning area, the parking area and Post Exchange buildings would be removed. The removal of these buildings and parking areas would temporarily reduce the available parking and reduce the facilities available for providing uses compatible with the recreational and goals in the Crissy Field planning area resulting in a temporary impact to the land use of this area.

Within the Letterman planning area, Staging would require the temporary use of the parking lot between Buildings 230 and 1063. Access to adjacent buildings would be maintained throughout the construction period. This temporary use of the parking area would not impact the overall land use or development pattern of the Letterman planning area.

In addition, construction of the Presidio Parkway Alternative would require that Building 106 (Band Barracks) be temporarily vacated during the construction period. The temporary closure of this building would not impact the overall land use or development pattern of the Main Post planning area.

#### ***Permanent Impacts***

The analysis of potential land use and planning impacts associated with each alternative has been categorized by geographic area. These geographic areas generally correspond to the planning areas defined in the PTMP and include Crissy Field; Letterman; Main Post; Fort Scott; and South Hills. In addition, Area A of the Presidio and surrounding San Francisco neighborhoods are examined. This section also describes the analysis of consistency of the proposed project alternatives with plans and policies that govern the study area and specifically highlights the inconsistencies of each alternative with the various plans.

#### **Alternative 1: No-Build**

The following permanent impacts have been identified for Alternative 1.

##### **Land Use**

No change to the existing or future land uses within the Presidio planning areas would occur under this alternative.

##### **Plans and Policies**

This discussion identifies the relationship between the No-Build Alternative and relevant plans and policies.

*2002 Presidio Trust Management Plan.* The PTMP identifies planning concepts and guidelines for distinct planning areas within the Presidio. The No-Build Alternative would generally be consistent with objectives of the PTMP such as minimizing impacts on park resources, providing direct access to the park (although only in the westbound direction) and maintaining Halleck Street as a pedestrian and bicycle route. Although the No-Build Alternative would accommodate a viable connection for the Tennessee Hollow drainage to Crissy Marsh there may be some limits to the functionality of the area as a wildlife corridor. The No-Build Alternative would be inconsistent with many of the PTMP guidelines. For example:

- By maintaining Doyle Drive entirely above grade, opportunities to increase open space and enhance scenic views and vistas would be substantially reduced.
- Although maintaining Doyle Drive above grade would not improve open space connections between Crissy Field (Area B) and other parts of the park (i.e., Main Post, Letterman Center, and Fort Scott), the alternative would maintain the existing access.
- The No-Build Alternative would not increase the existing percentage of shade found under the high-viaduct structure but would still have an adverse effect on restoration that attempts to restore shade-intolerant plants. The existing viaduct would potentially comprise an impediment to wildlife using the restored Tennessee Hollow/Crissy Marsh possible expansion area for movement to and from the existing Crissy Marsh. However, assuming the corridor under the viaduct is designed with natural features such as logs and rocks, it is concluded that the No-Build Alternative would not constrain the use of Tennessee Hollow area as a wildlife corridor for terrestrial wildlife, although some birds would be unlikely to pass through.

*1994 General Management Plan Amendment Environmental Impact Statement.* The No-Build Alternative would be consistent with two GMPA objectives for Doyle Drive, respect the Presidio's status as a national historic landmark and maintaining the function of Doyle Drive as part of the regional and city transportation system and the GMPA Planning Area Concepts for Area A. Inconsistencies with the GMPA include:

- The No-Build Alternative would not redesign Doyle Drive as a parkway.
- The No-Build Alternative would not minimize the effects of noise and other pollutants on the park.
- There would be no improvement to the Presidio entrance and circulation features of Doyle Drive.

*Doyle Drive Task Force Report.* The No-Build Alternative would be inconsistent with the report recommendations since there would be no improvements or changes to the existing Doyle Drive.

*Presidio Trails and Bikenways Master Plan & Environmental Assessment.* The No-Build Alternative is consistent with the overall goals of these documents. The alternative would not have an effect on existing or proposed trails and bikeways in the Presidio and would accommodate the goals and objectives of the plan.

*Presidio of San Francisco Vegetation Management Plan (VMP) and Environmental Assessment.* The No-Build Alternative would be inconsistent with the following two objectives in the VMP:

- The Alternative would not increase open space to enhance park values and improve the Presidio's natural and recreational qualities, although it does not preclude the expansion of open space within the park.
- The Alternative would not create opportunities for restoration of wildlife habitats, although it does not preclude the potential restoration of wildlife habitat.

*San Francisco General Plan.* The No-Build Alternative would be inconsistent with the Environmental Protection Element and Recreation and Open Space Element of the *San Francisco General Plan*. While the alternative would not substantially change existing conditions within the Presidio, it is inconsistent with *General Plan* policies because

- The alternative does not implement changes that would promote the preservation of additional open space or the natural character of the Presidio,
- Eliminate non-recreational uses or improve existing conditions for development of mass transit, slow traffic or reduce transportation noise.
- The No-Build Alternative would be inconsistent with the Transportation Element because it does not meet the *General Plan* design guidelines for Doyle Drive which calls for the road to be improved for greater safety and minimal conflict with the recreational and scenic values of the Presidio, although it would maintain the six lane design capacity.

*San Francisco Bay Plan.* The No-Build Alternative would be consistent with the *San Francisco Bay Plan*. It would not affect the shoreline or undeveloped areas of the Presidio nor would it discourage use of the shoreline recreation areas. The No-Build Alternative would accommodate an expansion of Crissy Marsh as in *Bay Plan* Map 4 Policy 27.

*Building Restoration Phase IIB and III, Palace of Fine Arts.* The No-Build Alternative would be consistent with the restoration plans for the Palace of Fine Arts.

### **Alternative 2: Replace and Widen Alternative**

The following permanent impacts have been identified for Alternative 2. The Replace and Widen Alternative involves replacing an existing roadway along the same corridor without expanding capacity and does not include the introduction of any new land uses to the Presidio. Implementation of the Replace and Widen Alternative would require the conversion of an additional 0.9 hectares (2.2 acres)

of land along the Doyle Drive corridor for the No-Detour Option and 0.6 hectares (1.5 acres) of land for the With Detour Option for permanent to additional right-of-way for the facility. This minor reduction in overall land area to replace an existing roadway would not impact the larger Presidio-wide land use and development goals outlined in the PTMP.

### **Land Use**

*Crissy Field.* Construction of the Replace and Widen Alternative - Detour Option would require the permanent removal of four buildings: Buildings 605 and 606 (Post Exchange), and 610 and 653 (Commissary). The removal of these buildings would result in the loss of approximately 13,200 square meters (142,000 square feet) of building space in the Crissy Field planning area and would be in conflict with the development goals of the Crissy Field planning area which call for an increase of 2,787 square meters (30,000 square feet) of building space. The removal of these non-historic buildings would result in an adverse effect on the land use and development of the Crissy Field planning area due to the permanent loss of space available for providing uses compatible with the recreational goals in the area. This is particularly evident with the removal of Building 610 (Commissary) which is designated in the PTMP for reuse as a museum although other potential sites for museum facilities are identified in the PTMP including the former aircraft hangers along the western portion of Crissy Field.

The Replace and Widen Alternative would not constrain the study area for possible future expansion of Crissy Marsh. The Replace and Widen Alternative would fail to provide a safe and inviting connection between Crissy Field and the Main Post area as called for in the PTMP. Nor would it improve the views to and from Crissy Field.

*Letterman.* Under the Replace and Widen Alternative - No-Detour Option, Building 1158 (Mercantile Specialty Store) would be permanently removed. The removal of 387 square meters (4,166 square feet) of building space would be in conflict with the PTMP which calls for an increase of 12,077 square meters (130,000 square feet) in building space. Currently, Building 1158 houses the Presidio Dance Theatre. The removal of this non-historic building would not severely impact overall land use of the Letterman planning area as the area would still function as a compact mixed-use office and residential area.

Implementation of the Replace and Widen Alternative would result in a change in access to the Letterman area. Direct access from northbound Doyle Drive to the Letterman area would no longer be available. Northbound vehicles would have to access the Presidio from Doyle Drive via the off-ramps to Merchant Road at the Golden Gate Bridge Toll Plaza and use Lincoln Boulevard to access the Letterman area. Pedestrian and vehicular circulation patterns within the planning area would remain as they currently are.



*Main Post.* The Main Post planning area would continue to serve as a focal point and visitor/community center for the Presidio. The Replace and Widen Alternative would accommodate the proposed rehabilitation of Tennessee Hollow. As previously stated, the alternative would fail to provide an open space connection between the Main Post and Crissy Field as called for in the PTMP.

*Fort Scott.* Under the Replace and Widen Alternative, no land use impact would occur to the Fort Scott area.

*Area A.* Under the Replace and Widen Alternative, no land use impact would occur in Area A of the Presidio.

*San Francisco Neighborhoods.* Under the Replace and Widen Alternative, no land use impact would occur to the neighborhoods adjacent to the Presidio.

### **Plans and Policies**

*2002 Presidio Trust Management Plan.* The PTMP identifies planning concepts and guidelines for distinct planning areas within the Presidio. The Replace and Widen Alternative would generally be consistent with the PTMP objective of maintaining Halleck Street as a pedestrian and bicycle route. Although the Replace and Widen Alternative would accommodate a viable connection for the Tennessee Hollow drainage to Crissy Marsh there may be some limits to the functionality of the area as a wildlife corridor. The Replace and Widen Alternative would be inconsistent with several of the PTMP guidelines including:

- Implementation of the Replace and Widen Alternative would result in short-term and long-term impacts on park resources.
- The Replace and Widen Alternative would not provide direct access to the Presidio.
- By maintaining Doyle Drive entirely above grade, opportunities to increase open space and enhance scenic views and vistas would be substantially reduced.
- Although maintaining Doyle Drive above grade would not improve open space connections between Crissy Field (Area B) and other parts of the park (i.e., Main Post Letterman Complex, and Fort Scott), the alternative would maintain the existing access.
- Although the Replace and Widen Alternative – No-Detour Option would not require removal of the Commissary (Buildings 610 and 653), the Replace and Widen Alternative – Detour Option would require the removal of the Commissary in order to accommodate the temporary detour structure. This would conflict with the PTMP desire to use the Commissary as a museum.
- The Replace and Widen Alternative would place wider structures in the Tennessee Hollow area. The increased width of the structures would cast approximately twenty-two percent and eighteen percent (for the No-Detour

and Detour Options, respectively) more full shade on a future Tennessee Hollow than the No-Build Alternative. This increase in shade would have an adverse effect on restoration that attempts to restore shade-intolerant plants. The new viaducts would potentially comprise an impediment to wildlife using the restored Tennessee Hollow/Crissy Marsh possible expansion area for movement to and from the existing Crissy Marsh. However, assuming that the corridor under the new viaducts is designed with natural features such as logs and rocks, it is concluded that the Replace and Widen Alternative would not constrain the use of the Tennessee Hollow area as a wildlife corridor for terrestrial wildlife, although some birds would be unlikely to pass through.

*1994 General Management Plan Amendment Environmental Impact Statement.*

The Replace and Widen Alternative would be consistent with two GMPA objectives for Doyle Drive, respect the Presidio's status as a national historic landmark and maintaining the function of Doyle Drive as part of the regional and city transportation system and the GMPA Planning Area Concepts for Area A. Inconsistencies between the Replace and Widen Alternative and GMPA include:

- The alternative would not redesign Doyle Drive as a parkway.
- It would not minimize the effects of noise and other pollutants on the park.
- It would not provide a new Presidio entrance.

*Doyle Drive Task Force Report.* Although the Replace and Widen Alternative would be consistent with some engineering recommendations in the *Doyle Drive Task Force Report*, such as three continuous six 3.6-meter (twelve-foot) lanes in each direction, it would be inconsistent with the overall design recommendations for a parkway, including:

- This alternative would not use tunnels and cut-and-cover to mitigate adverse impacts.
- It would not maximize views for park users or from nearby neighborhoods.
- This alternative would not minimize the height of the Doyle Drive vertical structures.
- It would not provide an interchange so that Doyle Drive traffic can enter the Presidio directly, instead of traveling through surrounding neighborhoods.

*Presidio Trails and Bikeways Master Plan & Environmental Assessment.* The Replace and Widen Alternative is consistent with these plans. This alternative would also accommodate the goals and objectives of the plan by allowing implementation of any alternative. The Replace and Widen Alternative would maintain access by allowing pedestrians and bicyclists to cross over or under the Doyle Drive facility at numerous locations. The completed Replace and Widen Alternative would accommodate those trail corridors (Tennessee Hollow Trail, Park Boulevard

Trail, and Presidio Promenade Trail) which cross under the Doyle Drive structure.

*Presidio of San Francisco Vegetation Management Plan (VMP) and Environmental Assessment.* The Replace and Widen Alternative would be inconsistent with several key objectives in the VMP:

- The Alternative would not increase open space to enhance park values and improve the Presidio's natural and recreational qualities, although it does not preclude the expansion of open space within the park.
- The Alternative would not restore and maintain wildlife habitats, although it does not preclude the potential restoration of wildlife habitat.
- Implementation of the alternative would not maintain the forest within the historic management zone and retain existing historic landscapes and plants, since it would require removal of approximately three hectares (7.4 acres) of tree cover, primarily near the Park Presidio interchange.

*San Francisco General Plan.* The Replace and Widen Alternative would be inconsistent with the Environmental Protection Element and Recreation and Open Space Element of the *San Francisco General Plan*. While the alternative would not substantially change existing conditions within the Presidio, it is inconsistent with the several plan policies:

- The alternative does not implement changes that would promote the preservation of additional open space or the natural character of the Presidio.
- The alternative does not eliminate non-recreational uses or improve existing conditions for development of mass transit, slow traffic or reduced transportation noise.
- The Replace and Widen Alternative would be partially inconsistent with the Transportation Element because while it does improve the safety of Doyle Drive, it does not minimize conflicts with the scenic values of the Presidio.
- The alternative would require an additional auxiliary lane to meet the safety goals which would make it inconsistent with the design guideline calling for a maximum of six lanes.

*San Francisco Bay Plan.* The Replace and Widen Alternative would not affect the shoreline or undeveloped areas of the Presidio nor would it discourage use of the shoreline recreation areas. This alternative would improve open space connections between the north and south sides of Doyle Drive. The Replace and Widen Alternative would maintain the existing access to the shoreline from within the Presidio and improve safety of the roadway. The alternative would also accommodate a possible expansion of Crissy Marsh as called for in *Bay Plan* Map 4 Policy 27.

*Building Restoration Phase IIB and III, Palace of Fine Arts.* The Replace and Widen Alternative would be consistent with the restoration plans for the Palace of Fine Arts.

#### **Alternative 5: Presidio Parkway Alternative**

The following permanent impacts have been identified for Alternative 5. The Presidio Parkway Alternative involves replacing an existing roadway along the same corridor without expanding capacity and does not include the introduction of any new land uses to the Presidio. Implementation of the Presidio Parkway Alternative would require the conversion of additional parkland along the Doyle Drive corridor to additional right-of-way for the facility. The amount of land required would vary depending on the various design options. The Diamond Option with the Loop Ramp would require 4.6 hectares (11.4 acres) while the Hook Ramp would require 4.1 hectares (10.1 acres). The Circle Drive Option with the Loop Ramp would require 4.5 hectares (11.1 acres) while the Hook Ramp would require 3.9 hectares (9.6 acres). Should the Merchant Ramp option be selected, it would require an additional 0.5 hectares (1.2 acres) of land. The majority of land to be converted to a transportation use is in areas currently designated as open space/natural. Other areas designated as mixed-use/visitor focus/office would also be converted. This reduction in overall land area to replace an existing roadway would not impact the larger Presidio-wide land use and development goals outlined in the PTMP but as discussed below the removal of various buildings would be in conflict the development plans of several PTMP defined planning areas.

#### **Land Use**

The following discussion focuses on land use and buildings within the Presidio. **Appendix B** illustrates the location of each building discussed in this section.

*Crissy Field.* The Presidio Parkway Alternative would require the permanent removal 4,711 square meters (50,709 square feet) of building space in the Crissy Field planning. The removal of this building space would be in conflict with the development goals of the Crissy Field planning area which call for an increase of 2,787 square meters (30,000 square feet) of building space. Buildings removed include Buildings 605 and 606 (Post Exchange) and 670 (Cable House). Proposed development plans identified in the PTMP, including re-use of Building 610 (Commissary) as a museum, rehabilitation of Building 650 (Stilwell Hall), implementation of educational uses at the Cavalry Stables, and possible expansion of Crissy Marsh, would not be limited by the Presidio Parkway Alternative. The area over the two tunnels would provide a new visual and open space connection between Crissy Field and the Main Post area as called for in the PTMP.

The Presidio Parkway Alternative reduces the area into which Crissy Marsh could expand to the east of the Commissary. This area is shown for proposed marsh

expansion in the GMPA, the original Crissy Marsh study and it is identified in the current *Crissy Marsh Expansion Study* as part of the historic marsh footprint and as part of area that is under consideration for future marsh expansion.

*Letterman.* Under the Presidio Parkway Alternative, Building 1158 (Mercantile Specialty Store) would be permanently removed. The removal of 387 square meters (4,166 square feet) of building space would be in conflict with the PTMP which calls for an increase of 12,077 square meters (130,000 square feet) in building space. Currently, Building 1158 houses the Presidio Dance Theatre. The removal of this non-historic building would not severely impact the overall land use of the Letterman planning area as the area would still function in its role as a compact mixed-use office and residential area.

The Circle Drive Option would require the permanent removal of the YMCA swimming pool (Building 1151) and would result in the loss of an additional 1,190 square meters (12,809 square feet) of building space. The removal of this building would result in the loss of a recreational feature within the Letterman planning area but would not limit the overall land use and development of the area.

There would be modifications to the circulation patterns of the area as Girard Road would be extended to form a new interchange with the Doyle Drive off-ramp and Gorgas Road. In addition, Palace Drive would be reconfigured to a one-way street with direct access from Richardson Avenue. The reconfigured roadways would result in the removal of several surface parking lots which would be replaced by an underground parking facility located between the Mason Street warehouses and Gorgas Street warehouses. The changes in circulation would improve access to the Letterman area and improve pedestrian and vehicular access between the Presidio and Palace of Fine Arts. The new entrance to the park would be in compliance with the PTMP guidelines for the Letterman planning area.

*Main Post.* Under the Presidio Parkway Alternative approximately 3,500 square meters (37,620 square feet) of building space would be permanently removed which would be in conflict with the PTMP which calls for an increase of 8,361 square meters (90,000 square feet) of building space in the Main Post planning area. The five buildings removed include, Buildings 201 (Exchange Store), 204 (Exchange Store), 205 (Sewage Pump House), 230 (NPS/Trust Archaeology Lab), and 231 (Exchange Gas Service Station). The removal of Building 201 would impact the historic connection along Halleck Street although the street would still remain as a vital connection between the Main Post and Crissy Field. Although Buildings 204, 230, and 231 are not specifically designated for reuse as a key land use (cultural, educational, office, or residential) in the PTMP their removal along with Building 201 and 205 would result in an impact to the overall land use of the Main Post planning area. The Presidio Parkway Alternative

would accommodate the proposed rehabilitation of Tennessee Hollow through the Main Post.

*Fort Scott.* Under the Presidio Parkway Alternative there is the potential for permanent removal of four buildings in the Fort Scott planning area. These buildings would only be removed should the Merchant Road Slip-Ramp Option be used. The four residential buildings (Buildings 1253, 1254, 1255 and 1256) are located along Armistead Road. The removal of these buildings would remove 805 square meters (8,664 square feet) of building space in the Fort Scott planning area. The loss of building square footage would be an impact of the proposed development plans outlined in the PTMP for the Fort Scott planning area which calls for an increase of 9,290 square meters (100,000 square feet) in building space. Numerous housing units are available in the immediate surrounding area of this northern part of Fort Scott planning area and additional housing is also available in the southern portion of the planning area along Storey Avenue, Ruckman Road and Kobbe Avenue. The implementation of the Merchant Road Slip-Ramp would provide direct access to the Golden Gate Visitor's Center.

*Area A.* There would be no impact to the land uses of Area A associated with the implementation of the Presidio Parkway Alternative although the Merchant Road Slip Ramp Option would be partially located in Area A. The slip ramp option would provide a connection from westbound Doyle Drive to Merchant Road which is located in Area A. Existing uses would be maintained and planned development would not be hindered, including the expansion of Crissy Marsh, although the area into which the marsh could expand to the east of the Commissary would be reduced.

*San Francisco Neighborhoods.* There would be no impact to the land uses of the surrounding San Francisco neighborhoods associated with the implementation of the Presidio Parkway Alternative.

### **Plans and Policies**

*2002 Presidio Trust Management Plan.* The Presidio Parkway Alternative would generally be consistent with objectives of the PTMP such as providing direct access to the Presidio, maintaining Halleck Street as a pedestrian and bicycle route, and enhancing the visual and pedestrian connections from the Main Post to Crissy Field. Although the Presidio Parkway Alternative would accommodate a viable connection for the Tennessee Hollow drainage to Crissy Marsh there may be some limits to the functionality of the area as a wildlife corridor. The Presidio Parkway Alternative would be inconsistent with the following PTMP land use and planning policy:

- Implementation of the Presidio Parkway Alternative would result in short-term and long-term impacts on park resources.

- **Balanced Use of Building Space** – The Presidio Parkway Alternative would not be consistent with this policy since it would require the permanent removal of Buildings 605 and 606 in the Post Exchange/Commissary area, Building 1158 in the Gorgas Warehouses area, Buildings 201, 204, 205, 230 and 231 in the Main Post – North Halleck area, and Building 670 in the Cavalry Stables area. If the Circle Drive Option is implemented, Building 1151 in the Gorgas Warehouses area would also be permanently removed. The Merchant Road Slip-Ramp Option would require the removal of four residential buildings (Buildings 1253 – 1256) along Armistead Road.
- The Presidio Parkway Alternative would not be consistent with the PTMP objective to preserve and enhance the historical resources of the Presidio.
- The Presidio Parkway Alternative would increase the width of roadway structures in the Tennessee Hollow area although at a lower height. The reduced height of the structures would result in approximately five percent less full shade on a future Tennessee Hollow than the No-Build Alternative. Due to the low average Height:-Width ratio of the Presidio Parkway Alternative, it is believed that no vegetation would establish under the causeway. The new viaducts would potentially comprise an impediment to wildlife using the restored Tennessee Hollow/Crissy Marsh area for movement to and from the existing Crissy Marsh. However, assuming that the corridor under the viaducts is designed with natural features such as logs and rocks, it is concluded that the Presidio Parkway Alternative would not constrain the use of the Tennessee Hollow area as a wildlife corridor for terrestrial wildlife, although some birds would be unlikely to pass through.

*1994 Presidio General Management Plan Amendment.* The Presidio Parkway would be consistent with the Doyle Drive specific policies set forth in the GMPA and the GMPA Planning Area Concepts for Area A.

*Doyle Drive Task Force Report.* The Presidio Parkway Alternative would be consistent with the report recommendations since it would improve the existing Doyle Drive with many features included in the proposed parkway concept.

*Presidio Trails and Bikenways Master Plan & Environmental Assessment.* The Presidio Parkway Alternative is consistent with this plan by improving public access to the Presidio, improving traffic safety for motorists, bicyclists and pedestrians, and supporting resource preservation by providing additional open space and enhanced scenic views. The Presidio Parkway Alternative would accommodate the goals and objectives of the plan. The Presidio Parkway Alternative would not permanently affect those trail corridors located in the vicinity of Doyle Drive including the Tennessee Hollow Trail, Park Boulevard Trail, or Presidio Promenade Trail. There would be improved views along portions of the Tennessee Hollow and Presidio Parkway Trails as sections of Doyle Drive would be placed in tunnels.

The Presidio Parkway Alternative would maintain access by allowing pedestrians and bicyclists to cross over or under the Doyle Drive facility at numerous locations. It would also include new pedestrian crossings on Girard Road between the Palace of Fine Arts and Girard Road, as well as a crossing at the Richardson Avenue/Gorgas Avenue intersection (DKS Associates, 2004).

*Presidio of San Francisco Vegetation Management Plan (VMP) and Environmental Assessment.* While the Presidio Parkway Alternative would increase open space and provide an opportunity for habitat restoration on the areas located above the tunnels, it would be inconsistent with several objectives in the VMP including:

- Implementation of the alternative would not maintain the forest within the historic management zone and retain existing historic landscapes and plants, since it would require removal of approximately 5.6 hectares (13.7 acres) of tree cover, primarily near the Park Presidio interchange for the Presidio Parkway Alternative with Diamond Interchange and Loop Ramp option. The Hook Ramp option would remove approximately 5.5 hectares (13.5 acres) of tree cover. Should the Circle Drive option be used the totals would increase an additional 0.1 hectares (0.2 acres). Additionally the Merchant Road Slip Ramp option would require an additional 0.5 hectares (1.1 acres) be removed.
- The Presidio Parkway Alternative would also be inconsistent with the VMP because of potential disturbance to groundwater at the Battery tunnels.

*San Francisco General Plan.* The Presidio Parkway Alternative would be partially consistent with the design guidelines presented in the Transportation Element. The alternative would improve safety of the roadway and also improve the scenic values of the Presidio by placing portions of the roadway in tunnels and lowering the height of the low-viaduct structure. The Presidio Parkway Alternative would not be consistent with a few *San Francisco General Plan* policies including:

- The additional eastbound auxiliary lane, between the Park Presidio interchange and the new Presidio access at Girard Road would create a seventh lane and be inconsistent with the guideline of a six lane design capacity.
- The Presidio Parkway Alternative would not be consistent with the *San Francisco General Plan's* policy to preserve landmarks and historic buildings. The Presidio Parkway Alternative would require the removal of the following historic buildings: Buildings 670, 201, 204 and 230. In addition, Building 1151 would be removed under the Circle Drive Option. Removal historic building is inconsistent with the policy to preserve landmarks and historic buildings.

*San Francisco Bay Plan.* The Presidio Parkway Alternative would not affect the shoreline or undeveloped areas of the Presidio. According to the *Bay Plan*, these



areas are to be retained for park uses and therefore, this alternative would not be in conflict with this policy. The alternative would also accommodate a possible expansion of Crissy Marsh as called for in *Bay Plan* Map 4 Policy 27. The Presidio Parkway Alternative would improve access to the Presidio and indirectly improve access to those recreational opportunities available along the Bay.

*Building Restoration Phase IIB and III, Palace of Fine Arts.* The Presidio Parkway Alternative would be inconsistent with the proposed entry dropoff/turnarounds at the north and south ends of Palace Drive.

Both the Diamond and Circle Drive Options would reconfigure Palace Drive so that it directly intersects with Richardson Avenue and operates as a one-way street in the northbound direction. Palace Drive would no longer connect to Lyon Street; rather Lyon Street would become one-way from Richardson Avenue and connect to Bay Street. The project sponsors would coordinate with the city and county of San Francisco Recreation and Park Department on the proposed design options for Palace Drive.

### ***Avoidance, Minimization, and/or Mitigation Measures***

Coordination with the Trust regarding location and duration of work in the Presidio would be carried out whenever feasible. Building removal associated with the build alternatives which is in conflict with the development plans of the PTMP would require an amendment to the plan prior to implementation of the alternative. See the discussion under Relocation for more information regarding building removal.

## **3.2.2 Parks and Recreation**

This section summarizes the type and location of park and recreational facilities within the study area. In addition, potential impacts and mitigation are presented.

### ***Regulatory Setting***

The *National Environmental Policy Act* (NEPA) and the *California Environmental Quality Act* (CEQA) both require the analysis of potential impacts to parks and recreational facilities. Impacts can be physical in nature (actual taking or encroachment on the facility) or it can be related to the users' enjoyment of the facility (increased noise, decreased safety, etc.). In addition to these analyses, the Federal Highway Administration (FHWA) also requires a separate impacts analysis of parks and recreational facilities if certain conditions are met.

Specifically, Section 4(f) of the United States Department of Transportation (USDOT) Act of 1966 provides protection to certain publicly used lands and historic sites. Under Section 4(f), FHWA shall not approve any program or project which requires the use of any publicly owned public park, recreation area,