

may be significant in a rural area” (*CEQA Guidelines* §15064, 2001). Appendix G of the *CEQA Guidelines* describes impacts that the California Resources Agency has determined are normally considered significant. These guidelines require that physical changes in the environment be evaluated based on factual evidence, reasonable assumptions supported by facts, and expert opinion based on fact.

#### 4.1.1 Significance Criteria

Analysis of each project alternative was conducted to determine if there would be an impact to a particular environmental resource. This review included a determination of whether an impact occurring from the implementation of an alternative would be rated as “significant” under CEQA. **Exhibit 4-1**, on the following two pages, summarizes the significance of temporary, long-term, and cumulative environmental impacts of the Doyle Drive Project alternatives under CEQA. Levels of significance stating “less than significant with mitigation incorporated” are based on the application of successful mitigation measures, meaning the impact would not be diminished until mitigation successfully accomplishes the desired goals.

Chapter 3 of this document provides a detailed discussion of the impacts for each resource category. Significant impacts were not identified for the No-Build Alternative which is used as the baseline for comparison with other alternatives.

## 4.2 Potentially Significant Impacts

This section discusses the resources which will experience significant impacts as a result of the Doyle Drive Project.

### 4.2.1 Cultural Resources

As outlined in Appendix G of the *CEQA Guidelines*, would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Significant cultural resources for the purposes of CEQA are those resources that are eligible for or are listed in the *California Register of Historical Resources* (CRHR). All resources that have been determined eligible for or are listed in the *National Register of Historic Places* (NRHP) are automatically eligible for the CRHR and as such, are considered historical resources for the purposes of CEQA. In addition, cultural resources included in local registers of historical resources, as defined in *Public Resource Code* (PRC) 5020.1(k) or 5024.1(g), are also considered to be historical resources for the purposes of CEQA. CEQA states that “a project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.”

**Exhibit 4-1  
Determination of the Level of Significance for Environmental Impacts of the Doyle Drive Project under CEQA**

| ENVIRONMENTAL ISSUE                           | PERMANENT IMPACTS   |   | TEMPORARY IMPACTS   |   | CUMULATIVE IMPACTS  |   |
|---|---|---|---|---|---|---|
|   | REPLACE AND WIDEN   | PRESIDIO PARKWAY & PREFERRED ALT                                | REPLACE AND WIDEN   | PRESIDIO PARKWAY & PREFERRED ALT                                | REPLACE AND WIDEN   | PRESIDIO PARKWAY & PREFERRED ALT                                |
| <b>GEOLOGY AND SOILS: SEISMIC</b>             | Significant; less than significant with mitigation incorporated | Significant with mitigation incorporated                        | Significant; less than significant with mitigation incorporated | Significant; less than significant with mitigation incorporated | Less than Significant   | Less than Significant   |
| <b>GEOLOGY AND SOILS: SERPENTINITE</b>        | Less than Significant   | Significant Unavoidable   | Less than Significant   | Significant Unavoidable   | Less than Significant   | Significant Unavoidable   |
| <b>HYDROLOGY, WATER QUALITY, STORM RUNOFF</b> | Less than Significant   | Significant; less than significant with mitigation incorporated |
| <b>HAZARDOUS WASTE</b>                        | Significant; less than significant with mitigation incorporated |
| <b>AIR QUALITY</b>                            | Less than Significant   | Less than Significant   | Significant; less than significant with mitigation incorporated | Significant; less than significant with mitigation incorporated | Less than Significant   | Less than Significant   |
| <b>NOISE AND VIBRATION</b>                    | Less than Significant   | Less than Significant   | Significant; less than significant with mitigation incorporated | Significant; less than significant with mitigation incorporated | Less than Significant   | Less than Significant   |
| <b>ENERGY</b>                                 | Less than Significant   |
| <b>WETLANDS</b>                               | Significant; less than significant with mitigation incorporated |

**Exhibit 4-1  
Determination of the Level of Significance for Environmental Impacts of the Doyle Drive Project under CEQA — Continued**

| ENVIRONMENTAL ISSUE   | PERMANENT IMPACTS                              |  | TEMPORARY IMPACTS                              |  | CUMULATIVE IMPACTS                             |  |
|---|--|--|--|--|--|--|
|   | REPLACE AND WIDEN                              | PRESIDIO PARKWAY & PREFERRED ALT               | REPLACE AND WIDEN                              | PRESIDIO PARKWAY & PREFERRED ALT               | REPLACE AND WIDEN                              | PRESIDIO PARKWAY & PREFERRED ALT               |
| <b>VEGETATION</b>   | Significant; less than mitigation incorporated |
| <b>WILDLIFE</b>   | Significant; less than mitigation incorporated |
| <b>PARKS, RECREATION AREAS</b>  | Less than Significant                          |
| <b>LAND USE, PLANNING AND GROWTH</b>                                  | Significant Unavoidable                        | Significant Unavoidable                        | Less than Significant                          | Less than Significant                          | Less than Significant                          | Less than Significant                          |
| <b>COMMUNITY IMPACTS (SOCIAL, ECONOMIC) AND ENVIRONMENTAL JUSTICE</b> | Less than Significant                          |
| <b>UTILITIES AND EMERGENCY SERVICE</b>                                | Less than Significant                          |
| <b>TRAFFIC/TRANSPORTATION/ PEDESTRIAN AND BICYCLE FACILITIES</b>      | Less than Significant                          |
| <b>VISUAL/AESTHETICS</b>  | Significant Unavoidable                        | Less than Significant                          | Significant Unavoidable                        | Significant Unavoidable                        | Significant Unavoidable                        | Less than Significant                          |
| <b>HISTORIC RESOURCES</b>   | Significant Unavoidable                        |
| <b>ARCHAEOLOGICAL RESOURCES</b>                                       | Less than Significant                          | Significant Unavoidable                        | Less than Significant                          | Less than Significant                          | Less than Significant                          | Less than Significant                          |

The significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that conveys its historical significance and justifies its inclusion in, or eligibility for, the CRHR. Essentially, this means that if a project demolishes an entire historical resource, or alters it adversely so that it would no longer be eligible for the *California Register* or be considered to be a historical resource, the project would have a substantial adverse change to that resource. However, after project construction, if the resource would still possess historical significance such that it would still be eligible, there would be no substantial adverse change.

The following analyzes the impacts of the Doyle Drive Project on six properties considered historical resources for the purposes of CEQA. These include the Presidio National Historic Landmark District (NHLD), the Golden Gate Bridge to which Doyle Drive is a contributor, the Doyle Drive Marina and Presidio Viaducts (individually NRHP eligible and historical resources under CEQA), archaeological site CA-SFR-6/26, and the Palace of Fine Arts.

The Replace and Widen Alternative would impact the Presidio NHLD through the removal and replacement of Doyle Drive, which is a contributing element of the Presidio NHLD. The Replace and Widen Alternative, No-Detour Option would impact the Presidio NHLD through the alteration of the following contributing elements: Battery Blaney Road, Veterans Boulevard (Highway 1), Lincoln Boulevard, and Crissy Field Avenue. In addition, there would be impacts to the cultural landscape of the Presidio NHLD due to the alteration or removal of existing cultural landscape features and the addition of new non-historic features into the cultural landscape.

The With Detour Option would additionally impact the Presidio NHLD through the removal of Buildings 1182, 1183, 1184, and 1185 (four of the seven Mason Street warehouses), which are contributing elements of the district. These impacts would not result in a substantial adverse change in the NHLD because it will still retain sufficient integrity to convey its historical significance and would remain eligible for the *California Register* and be considered an historical resource under CEQA.

The Replace and Widen Alternative, both With Detour and No-Detour Options, would cause an impact to the Golden Gate Bridge through the destruction of Doyle Drive, which is also eligible for the NRHP as a contributor to the Golden Gate Bridge. This alternative would also cause indirect impacts to the Golden Gate Bridge by introducing new visual elements in place of existing contributing elements. These impacts would not result in a substantial adverse change in the Golden Gate Bridge because it will still retain sufficient integrity to convey its historical significance and would remain eligible for the *California Register* and be considered an historical resource under CEQA.

The Replace and Widen Alternative, both With Detour and No-Detour Options, would cause a substantial adverse change to the Marina and Presidio Viaducts of

Doyle Drive (determined individually NRHP eligible and are historical resources under CEQA) because they would be demolished.

The Replace and Widen Alternative, both With Detour and No-Detour Options, would not result in substantial adverse change to the Palace of Fine Arts, nor would archaeological site, CA-SFR-6/26, experience substantial adverse change because the area will be designated as an Environmentally Sensitive Area (ESA) and protected during construction.

The Presidio Parkway and Preferred Alternatives will impact the Presidio NHLD through the destruction of the following contributing elements of the Presidio NHLD: Doyle Drive (including the high-viaduct and low-viaduct), Building 201, Building 204, Building 230, Building 670, and Building 1151 (under the Presidio Parkway Alternative, Circle Drive Option only), as well as Bank Street, Veterans Boulevard (Highway 1), Battery Blaney Road, Crissy Field Avenue, Cowles Street (under the Presidio Parkway Alternative, Hook Ramp Option and Preferred Alternative only), Girard Road, Gorgas Avenue, Halleck Street, Marshall Street, and Lincoln Boulevard.

Under the Preferred Alternative, Buildings 230 and 670 will be demolished to make way for the parkway. The top story of Building 201 will be removed, stored during construction of the project, and then relocated and restored at its original Halleck Street location. Building 204, which had been previously moved to its current location and a portion of the building removed when Doyle Drive was originally built, will also be removed with useable building components salvaged. Building 228 will be affected by the raising of the west end of Halleck Street. The raising of Halleck Street in order to cross over a tunnel segment of Doyle Drive will have an effect on the setting of Building 228 and the Halleck Street area. A final decision as to the treatment of buildings will be determined prior to the completion of the *Programmatic Agreement* (PA).

In addition, both the Presidio Parkway and Preferred Alternatives will cause indirect impacts to the Presidio NHLD by introducing visual elements that will diminish the integrity of the linkage and physical plan of the district, i.e., the cultural landscape. These impacts will not result in a substantial adverse change in the NHLD because it will still retain sufficient integrity to convey its historical significance and will remain eligible for the *California Register* and be considered an historical resource under CEQA.

The Presidio Parkway and Preferred Alternatives will cause a direct impact to the Golden Gate Bridge through the destruction of Doyle Drive, which is a contributing element of the bridge property. These alternatives will also cause an indirect impact to the Golden Gate Bridge because it will introduce new visual elements in place of existing contributing elements of the bridge.

These impacts will not result in a substantial adverse change in the Golden Gate Bridge because it will still retain sufficient integrity to convey its historical significance and will remain eligible for the *California Register* and be considered an historical resource under CEQA.

Both the Presidio Parkway and Preferred Alternatives would cause a substantial adverse change to the Marina and Presidio Viaducts of Doyle Drive (determined individually NRHP eligible and are historical resources under CEQA) because the viaducts will be demolished.

Based on available information, the Presidio Parkway and Preferred Alternatives will not have an impact on the Palace of Fine Arts property; however, there are concerns about possible vibration impacts to the buildings and the lagoon. Although the project meets standards for acceptable vibration levels in proximity of fragile historic structures, additional vibration testing and the preparation of a *Historic Structures Report* for the Palace of Fine Arts will be implemented to ensure that the property will not be damaged during construction of the roadway.

The archaeological site, CA-SFR-6/26, will not experience substantial adverse change because the area will be designated as an environmentally sensitive area and protected during construction. Because the large underground parking facility has been eliminated from the Preferred Alternative, potential impacts to unknown archaeological sites will be less than those identified for the Presidio Parkway Alternative in the DEIS/R. If prehistoric or historic period archaeological sites are identified prior to or during construction, then the construction of any build alternative may cause substantial adverse change to the significance of these resources.

This project also requires compliance with *PRC 5024* which requires state agencies to formulate policies to preserve and maintain, when prudent, all state-owned historical resources under its jurisdiction, to give a notice and a summary of the proposed project's effects on state-owned historic properties to the State Historic Preservation Officer (SHPO) for review and comment, and adopt prudent and feasible measures that will eliminate or mitigate the adverse effects. Doyle Drive is a state-owned facility. Caltrans will consult with the SHPO in compliance with *PRC 5024* concurrently with its *Section 106* consultation.

The impacts associated with the Replace and Widen, Presidio Parkway and Preferred Alternatives will result in **unavoidable significant impacts** under CEQA since all build alternatives would require the demolition of the historic Marina and Presidio Viaducts of Doyle Drive. Other historic resources such as the Golden Gate Bridge, Presidio NHLD and Palace of Fine Arts will not be adversely impacted and will remain eligible for the *California Register* and be considered an historical resource under CEQA. In addition, none of the build alternatives will impact archaeological site CA-SFR-6/26.

#### 4.2.2 Visual

As outlined in Appendix G of the *CEQA Guidelines*, would the project have a substantial adverse effect on a scenic vista?

Within and around the project area, views of the Golden Gate Bridge, Marina headlands and the bay are accessible, particularly from areas within the Presidio. The existing Doyle Drive facility consists of high- and low-viaducts that currently

obstruct some views of these scenic resources. Under the Replace and Widen Alternative, No-Detour Option the low-viaduct would be raised approximately two meters (six feet), with an almost doubling of the width of the roadway which would result in an **unavoidable significant impact** under CEQA (increased view blockage and visual dominance) primarily when viewed from the Main Post area.

#### 4.2.3 Soils and Geology: Serpentinite

As outlined in Appendix G of the *CEQA Guidelines*, would the project result in the loss of availability of locally-important mineral resource delineated on a local general plan, specific plan or other land use plan?

Construction of the Presidio Parkway and Preferred Alternatives will result in removal of a portion of the geologic materials in the bluff area (Serpentinite) that comprise a designated resource as defined in the *Presidio Trust Management Plan* (PTMP). In accordance with the criteria established in the PTMP, the removal of these materials is considered an **unavoidable significant impact** under CEQA.

#### 4.2.4 Land Use and Planning

As outlined in Appendix G of the *CEQA Guidelines*, would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect?

All project alternatives will conflict with various aspects of the plans analyzed as part of the project. Specifically, the No-Build Alternative would conflict with elements of the *General Management Plan Amendment* (GMPA), *Presidio Trust Management Plan* (PTMP), *San Francisco General Plan*, and *San Francisco Bay Plan*. The Replace and Widen Alternative would conflict with elements of the GMPA, PTMP, *Vegetation Management Plan* (VMP), and *San Francisco General Plan* while the Presidio Parkway and Preferred Alternatives would conflict with various aspects of the PTMP, VMP, and *San Francisco General Plan*. The conflicts between the alternatives and various planning documents are considered **unavoidable significant impacts** under CEQA.

### 4.3 Impacts Mitigated to Less than Significant

This section discusses the resources which will experience less than significant impacts as a result of the Doyle Drive Project.

#### 4.3.1 Air Quality

As outlined in Appendix G of the *CEQA Guidelines*, would the project expose sensitive receptors to substantial pollutant concentrations?