

ceremonies. For the last several decades this property has been used as a surface parking lot. The Presidio Trust is now re-establishing the Main Parade Ground as a gathering place for park visitors, residents, and employees. In June 2008, the Presidio Trust released its draft updated plan for the Main Post and *Draft Supplemental Environmental Impact Statement* which outline ideas for sharing the Presidio's history and establishing new ways to use and enjoy the Main Post area. The public comment period for this document extends through October 20, 2008.

Golden Gate Bridge District Remediation, Phase II (Golden Gate Bridge Highway and Transportation District) – on-going

Remediation of contaminated soils below the Golden Gate Bridge is occurring as a two-phase project. Phase I, now completed, focused on cleanup of contamination in areas directly below the bridge where safe access was needed for construction crews working on the Golden Gate Bridge Seismic Retrofit Project. Affected areas include Battery East and popular vista areas near the bridge. Phase II will continue to investigate contaminated soils to determine where remediation is required. The Phase II planning horizon is approximately five years.

This cumulative assessment considers the potential for the Doyle Drive Project, in combination with the projects listed above, to have impacts on the environment of the Presidio and surrounding area.

5.6 Cumulative Impacts Evaluation

First the direct effects (impacts) on the critical resources caused by the Doyle Drive Project were identified from the technical reports for each of those subjects. Indirect effects resulting from the direct effects on the critical resources were then estimated. Similar information, where possible, was gathered from available sources for each of the projects (listed above) included in the cumulative effects analysis. If impacts information was not available, professional judgment was utilized and general assumptions were made. Finally, the effects were re-examined in combination with each other to estimate the cumulative effect on each critical environmental resource.

5.6.1 Traffic and Transportation

Doyle Drive is part of a roadway network which provides access in and out of the city of San Francisco. The Golden Gate Bridge, including U.S. Highway 101, Route 280, Route 80, Highway 1, and the San Francisco-Oakland Bay Bridge are also part of this system. The most recent *2030 Regional Transportation Plan for the San Francisco Bay Area* (Metropolitan Transportation Commission, 2005) lists several ongoing projects on these facilities (the larger, projects are discussed earlier in this chapter) over the next several years that could affect traffic operations.

During the construction period, delays associated with other projects could result in a cumulative effect of increased traffic delay in terms of access into the City. These delays will be considered temporary. The potential for increased delay and congestion will depend on the timing of construction activities associated with each project, the amount of traffic diversion from these facilities to Doyle Drive, and measures that will be implemented to eliminate or reduce potential impacts such as public awareness campaigns and increased transit service.

A draft *Transportation Management Plan* (TMP) has been prepared and will be developed in greater detail prior to construction of the Doyle Drive Project. In the event of a weekend closure of the facility during construction, mitigation funds may be provided to the Golden Gate Bridge, Highway and Transportation District to provide additional ferry service to accommodate the additional need. However, the details of the TMP will not be finalized until construction of the Doyle Drive Project is imminent.

Once constructed, long-term cumulative impacts are not expected. The long-term baseline traffic conditions (2030 No-Build) in the Doyle Drive Project study area were analyzed using the travel demand forecasting model that was developed by the City and the San Francisco County Transportation Authority (the Authority). Future conditions in this model included all known past, present, and future projects identified in the draft *Presidio Transportation Improvement Plan*. Therefore, the Doyle Drive Project was analyzed in the context of long-range traffic conditions for the San Francisco Bay Area. As such, the baseline future forecast actually presents cumulative transportation effects. Overall, the Project will result in a benefit or little change to long-term traffic conditions in the region.

5.6.2 Biological Environment

Projects that will have a net local, long-term, beneficial cumulative effect on biological resources include those that will protect, enhance or expand biological resources in the Presidio. These projects include the Crissy Field Marsh Project and the Tennessee Hollow Riparian Corridor Enhancement Project.

The implementation of the Crissy Field Marsh Project has transformed 40 hectares (100 acres) of asphalt surrounded by chain link fence to a restored dune and tidal marsh system, and increased habitat as well as diversity of plant and wildlife species. In addition, a *Crissy Field Marsh Feasibility Study* is currently underway. If this study identifies priority areas within the Presidio Trust's jurisdiction critical to ensuring the health of the marsh, the Trust will ensure that the Crissy Field planning efforts are completed and implemented in a timely manner. These efforts will result in increased species richness, the reintroduction and expansion of endangered species populations, and a net increase in habitat for native communities and wetland systems.

The Tennessee Hollow Riparian Corridor Enhancement Project will connect to the expanded Crissy Field tidal marsh and will restore Tennessee Hollow,

including its three main tributaries, as well as native riparian habitat that will be suitable for nesting avian species.

The Presidio Environmental Remediation Actions will result in short-term adverse effects on special-status species. However, the beneficial effects in the long-term due to increased habitat for special-status species will outweigh adverse effects of these actions. Implementation of *U.S. Fish and Wildlife Service Recovery Plans* will have short-term construction-related impacts on special-status species, including San Francisco lessingia, but the long-term benefits to listed plant species of those plans will outweigh any adverse short-term effects.

The Replace and Widen Alternative coupled with the other projects in the study area would result in temporary and long-term effects on biological resources, primarily on important plant communities, Army Corps of Engineers (USACE) jurisdictional waters of the U.S., Cowardin wetlands under protection of the National Park Service (NPS) or the Presidio Trust, and nesting bird species. These cumulative effects would contribute cumulatively to non-listed special-status plant and animal species, native plant community and jurisdictional wetland impacts at the Presidio. The cumulative benefits of restoration projects in historically disturbed and existing disturbed areas would outweigh the adverse effects of project construction activities under the Replace and Widen Alternative on biological resources.

The Presidio Parkway and Preferred Alternatives share some of the impacts described above for the Replace and Widen Alternative. These alternatives also include underground (tunnel) segments with possible indirect effects on hydrology. The long-term benefits of cumulative restoration of historically disturbed and existing disturbed areas proposed under the Presidio plans and projects will reduce the effects on biological resources. For all build alternatives, implementation of mitigation will reduce adverse effects of the Doyle Drive Project, and will thus reduce cumulative impacts on non-listed special-status plant and animal species, native plant communities, and jurisdictional wetlands. Overall, the cumulative impacts may provide a beneficial effect on the study area.

5.6.3 Hydrology, Water Quality, and Stormwater Runoff

The combination of the Doyle Drive Project and other proposed projects, including the restoration of Tennessee Hollow, the Presidio Water Recycling Project, and projects associated with various alternatives of the *General Management Plan Amendment (GMPA)* and the *Presidio Trust Management Plan (PTMP)*, will almost certainly have an overall net benefit to surface water quality conditions and improved watershed function due to the decrease in impervious surface area as identified in the PTMP that will be associated with these projects.

Along the Doyle Drive roadway corridor, however, there is the potential for an overall increase in impervious surface area if the Replace and Widen Alternative were to be selected. The increase in impervious surface under the Replace and Widen Alternative would lead to an increase in runoff. Through the increased

runoff, there is the potential for the transport of greater quantities of pollutant loads to the Bay leading to a cumulative impact to the overall water quality of the Bay. However, the Presidio Parkway and Preferred Alternatives will result in a net decrease in impervious cover because much of the roadway will be underground in a tunnel and not exposed to rainfall and runoff. The Presidio Parkway and Preferred Alternatives will provide a net benefit related to reduced runoff volumes.

Under any of the build alternatives, stormwater quality improvement measures, referred to as *best management practices* (BMPs) will be required for the Doyle Drive Project. These BMPs will treat the runoff prior to discharge to the maximum extent practicable. Under the existing conditions, runoff from the Doyle Drive structure drains to the surrounding lands and creeks without any treatment.

Given the requirement for BMPs for the build alternatives, as well as the decrease in impervious surfaces in the extended study area (for the Presidio Parkway and Preferred Alternatives), there will be an overall cumulative beneficial effect to surface water quality to area creeks and the San Francisco Bay if the project were to be implemented.

No cumulative impacts to flooding or groundwater resources are anticipated. Cumulative impacts associated with construction dewatering, or construction-period runoff water quality are not anticipated.

5.6.4 Cultural Resources

The regulatory context for assessing cumulative impacts to cultural resources is *Section 106* of the *National Historic Preservation Act* (see section 3.2.11). This cumulative impacts section analyzes the potential for cumulative impacts to the six historic properties, including the Presidio National Historic Landmark District (NHLD), the Marina and Presidio Viaducts of Doyle Drive, the Golden Gate Bridge, the Palace of Fine Arts, and archaeological site CA-SFR 6/26.

Other than the Doyle Drive Project, plans which identify land use concepts for the Presidio and could affect contributing elements to the NHLD are the *General Management Plan Amendment* (GMPA), and the *Presidio Trust Management Plan* (PTMP). These plans include projects that will demolish a number of historic structures, and could adversely affect other historic structures that contribute to the NHLD. They also include components that will enhance some cultural landscapes and rehabilitate some historic structures. Overall, the Doyle Drive Project, in conjunction with the other projects noted above, will have a cumulative impact on historic resources.

In addition to the projects identified earlier in this chapter, other Presidio projects were also considered in combination with each of the build alternatives to capture potential cumulative effects:

- Historic Building Restoration, Presidio NHLD – on-going
- Construction of Trails and Scenic Overlooks, Presidio NHLD – on-going

- Management of Natural Areas and Wildlife, Presidio NHLD – on-going
- Management of the Historic Forest, Presidio NHLD – on-going
- Management of Designed Landscapes, Presidio NHLD – on-going.

For this analysis, these known past, present, and future undertakings have been considered in conjunction with adverse effects identified in this document for the build alternatives, as well as compared to the existing conditions on the Presidio as described in the 1993 updated documentation of the Presidio NHLD. Since the 1993 inventory, 39 buildings and structures that were contributors to the Presidio NHLD, and which would have been located within the Focused Area of Potential Effect (APE), have been removed. These contributors were primarily located in the east and west ends of the Crissy Field Planning District and were demolished to accommodate the rehabilitation of Crissy Marsh. A few buildings were also removed from the Crissy Field and Letterman Planning Districts during other projects.

The 39 buildings and structures removed from these areas since 1993 dated to the twentieth century, and most were built just before or during the first years of World War II (circa 1940 to 1942). These buildings and structures (including the railroad line) were identified as contributing elements of the landmark district, even though many were described in the 1993 updated documentation as having “marginal integrity” because of demolition of other nearby buildings and various additions and modifications.³ At least eight NHLD contributing buildings and structures located near (north of) the Mason Street warehouses at the east end of Crissy Field, were demolished as part of past projects.

The following discussion addresses these impacts by project alternative.

Alternative 2, Replace and Widen – Presidio Impacts

The cumulative effect of the previous demolition of contributing elements, in conjunction with the Replace and Widen Alternative, differs depending upon the option under consideration. The Replace and Widen, No-Detour Option, would not contribute to an adverse cumulative effect to the Presidio NHLD. This alternative would not contribute to the erosion of the Presidio NHLD’s boundary within the Crissy Field Planning District (or North Cantonment historic functional area) because it does not require the removal of additional contributing elements, other than Doyle Drive. The removal of buildings in this area has been a concern because fewer buildings remain and those that have been preserved function to represent the historical function of the area as well as define the Presidio’s north east boundary.

The new Doyle Drive structures built under this option would resemble the existing Doyle Drive facility in overall location, material, color, and form and although they would be larger in scale and mass, they would not result in a cumulative adverse effect to the Presidio NHLD as defined by the *Criteria of*

³ NPS, “Presidio ... Registration Forms,” page 7-181.

Adverse Effect as outlined in 36 CFR 800.5(a)(1). Although Doyle Drive is a contributor to the Presidio NHLD and would be removed under this alternative, its loss would not contribute to a cumulative effect on the Presidio NHLD. The potential for this alternative to contribute to a cumulative effect to the Presidio NHLD, is low and a cumulative effect is not predicted.

The Replace and Widen, With Detour Option, could contribute to an adverse cumulative effect to the Presidio NHLD. Although Doyle Drive is a contributor to the Presidio NHLD and would be removed under this alternative, its loss would not contribute to a cumulative effect on the Presidio NHLD. While the new Doyle Drive structures built under this option would resemble the existing Doyle Drive facility in overall location, material, color, and form, this alternative would contribute to the erosion of the northeast boundary of the NHLD by removing contributing elements located in the Crissy Field Planning District, at the northeast corner of the NHLD. Specifically it would require the removal of four of the seven Mason Street warehouses (Buildings 1182, 1183, 1184, and 1185) from their original locations. Past projects have resulted in the demolition of at least eight NHLD contributing elements in this part of the former North Cantonment, just north of the Mason Street warehouses. The construction of the Replace and Widen, With Detour Option, therefore, would increase the loss of contributing elements in this area of the Presidio NHLD where few contributing buildings and structures remain. The removal of the warehouses could result in this area becoming a non-contributing portion of the Presidio NHLD, and erode the boundary of the district because it would no longer contain contributing elements. It is possible, therefore, for this alternative to result in an adverse cumulative effect to the Presidio NHLD, when compared to past, present, and future projects.

There would be direct effects to the cultural landscape resources of the Presidio NHLD under Alternative 2: Replace and Widen due to the: 1) alteration or removal of existing cultural landscape features; and 2) the addition of new non-historic features into the cultural landscape. The Replace and Widen Alternative would result in the destruction or alteration of historic circulation features including Doyle Drive, Veterans Boulevard, Lincoln Boulevard, Crissy Field Avenue, Battery Blaney Road, Marshall Street, Mason Street, Gorgas Avenue, and Halleck Street. In addition, construction would result in the removal of historic circulation features located in the area to the east and west of Halleck Street (south of Mason Street and north of Gorgas Avenue) and the paved and graveled open area under and south of the Doyle Drive viaduct, west of the Mason Street warehouses, north of Gorgas Avenue, and east of Halleck Street would be removed and landscaping would be added after construction. The removal of circulation features and the addition of landscaping would lessen the design, setting, materials, workmanship, association, and feeling that reflect the utilitarian and industrial functions of the Presidio and would result in an adverse effect and contribute to an adverse cumulative effect to the cultural landscape of the Presidio.

The construction of this alternative would also result in the alteration of the stands of trees in the area west of the Park Presidio Interchange and trees in the area east of the Park Presidio Interchange. Trees that are located in the area north of Lincoln Boulevard and south of the new at-grade portion of Doyle Drive would be removed, in addition to one of the palm trees that are located to the north of the existing low-viaduct structure in the New Commissary and Post Exchange parking lot, and one or more of the four Monterey cypress trees located to the west of the Mason Street warehouses (Buildings 1184 and 1185). These trees are a part of the historic vegetation features of the cultural landscape and their destruction would result in an adverse effect and contribute to an adverse cumulative effect to the cultural landscape of the Presidio.

There would also be indirect visual effects on the Presidio's cultural landscape under Alternative 2: Replace and Widen. Currently, Doyle Drive is clearly visible from Crissy Field and is a prominent feature in views toward the south, southeast, and southwest from Crissy Field. Key visual characteristic views of Doyle Drive from Crissy Field are: 1) the bridge's materials, color, form, massing, scale; and 2) the structure's decreasing elevation from west to east, reflecting the decreasing elevation of the natural topography of the bluff. Under Alternative 2, the existing Doyle Drive structure would be demolished and replaced with a new Doyle Drive structure that would be visible from Crissy Field. The new structure would be built on the existing structure's alignment. It would have a similar relationship to the natural topography of the bluff as the existing structure and the new structure's materials, color, and form would be similar to that of the existing structure. However, the new structure would be wider, and higher under the No-Detour Option, than the existing Doyle Drive. From a distance, the increased width and height of the new structure would be comparable in massing and scale to that of the existing structure. However, the increased width and height would increase the structure's visual presence and would alter the integrity of feeling in the areas immediately adjacent to Doyle Drive and contribute to an adverse cumulative effect to the cultural landscape of the Presidio.

Alternative 2, Replace and Widen – Individual Historic Properties

The potential for this alternative to result in a cumulative effect to the historic properties, when compared to past, present, and future projects, is described below by individual property.

The Marina and Presidio Viaducts of Doyle Drive would not experience a cumulative effect under the Replace and Widen Alternative because they would experience a direct adverse effect under this alternative. The Doyle Drive viaducts would be destroyed under both options of the Replace and Widen Alternative. This action constitutes a direct adverse effect on Doyle Drive but does not contribute to a cumulative effect because the entire eligible property (Doyle Drive) would no longer exist.

The Replace and Widen Alternative would likely cause an adverse cumulative effect on the Golden Gate Bridge historic property. This property would experience a direct adverse effect under both options of this alternative through the removal of Doyle Drive, which is a contributing element of the bridge property. It is possible that this effect, in combination with other current and future projects, would be cumulatively adverse. Other projects that involve the Golden Gate Bridge are on-going, however, the scope of the effects of these projects on the remaining portions of the Golden Gate Bridge property are not known at this time: the Golden Gate Bridge Seismic Retrofit Project, the Golden Gate Bridge Movable Median Barrier Project, Golden Gate Bridge Cable Restoration, and the Richardson Avenue Slip Ramp Project. It is not clear which features of the Golden Gate Bridge property will retain integrity once these projects are completed, but it is presumed that these proposed projects would not threaten the NHL eligibility of the Golden Gate Bridge. It may be necessary, however, to re-define the contributing elements of the bridge property upon completion of the current project.

The Replace and Widen Alternative would not cause an adverse cumulative effect on the Palace of Fine Arts property, a property that is listed in the NRHP. This historic property would not experience direct or indirect adverse effects under either option of this alternative and its designation as a NRHP-listed property would not be affected by the Project. This alternative would not cause an adverse cumulative effect when considered in conjunction with past, present, and future projects. Neither of the known on-going projects appears likely to cause adverse effects to the Palace of Fine Arts (Richardson Avenue Slip Ramp Project or the Rehabilitation of the Palace of Fine Arts Projects). It is assumed that the rehabilitation project will be accomplished in a manner consistent with the *Secretary's Standards for the Treatment of Historic Properties* (36 CFR part 68) and applicable guidelines [36 CFR 800.5(a)(2)(ii)], and would not “diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association” [36 CFR 800.5(a)(1)] of the Palace of Fine Arts Property.

The Replace and Widen Alternative would not cause an adverse cumulative effect on archaeological site CA-SFR-6/26 and it would remain eligible for the NRHP. This alternative would not cause direct or indirect adverse effects on known archaeological resources, nor does it appear that other known current and future projects would cause adverse effects to archaeological resources that would be cumulative when considered with the current project.

Alternative 5, Presidio Parkway – Presidio Impacts

The Presidio Parkway Alternative (under either option) could result in an adverse cumulative effect on the Presidio NHL. This alternative would introduce new structural and visual elements into a part of the Presidio NHL that has already lost some historic integrity through the demolition of contributing buildings and structures. The viaducts, tunnels, and at-grade portions of the Presidio Parkway Alternative that would be constructed in this northeast corner of the Presidio NHL would not resemble the existing Doyle Drive facility in overall location,

massing, and scale. In addition, the Presidio Parkway Alternative would require the destruction of additional contributing elements. The Presidio Parkway Alternative, under the Diamond Option, would result in the destruction of Buildings 201, 204, and 230, all of which are located in the former Quartermaster Depot functional area of what is now the Main Post Planning District and Building 670 which is in the vicinity of the Calvary Stables.

The Presidio Parkway Alternative, under the Circle Drive Option, would result in the destruction of the same four buildings, as well as Building 1151, which is located in the Letterman Planning District. Both options would require alteration of contributing roadways, including: Young Street, Bank Street, Halleck Street, Gorgas Avenue, Girard Road, Marshall Street, and Vallejo Street. The Presidio Parkway Alternative, therefore, would result in both the introduction of new construction, and the destruction of contributing buildings and structures under both options, and when considered in conjunction with past, present, and future projects, would result in an adverse cumulative effect to the Presidio NHLD.

There would be direct effects to the cultural landscape elements of the Presidio NHLD under the Presidio Parkway Alternative due to the alteration and removal of historic features and the addition of non-historic features into the cultural landscape. The construction of the new Doyle Drive structure would result in the destruction or alteration of historic circulation features including Doyle Drive, Veterans Boulevard, Cowles Street, Lincoln Boulevard, Crissy Field Avenue, Battery Blaney Road, Marshall Street, Bank Street, Mason Street, Gorgas Avenue, and Halleck Street. The construction of the new Doyle Drive structure would alter the existing grade of the bluff, a historic topographic feature of the Presidio cultural landscape. The presence of a continuous bluff is a character-defining feature of the Presidio. Its removal or alteration would impact the integrity of the Presidio and would lessen the understanding of the development of the Presidio over time. In particular the historic reasons for the location of the Main Post and the historic topographic and spatial relationship between the Main Post and the Lower Post areas on Crissy Field would be less apparent. The alteration and destruction of these historic topographic, circulation, and spatial organization features of the cultural landscape features would lessen the design, materials, workmanship, setting, feeling, and association that reflect:

- the spatial relationship of the Main Post, located upland of the Lower Post; and
- the service and supply land uses and activities and the related utilitarian nature of this portion of the Presidio.

This would constitute “physical destruction of or damage to all or part of the property” and “change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance” and as such is an adverse effect under 36 CFR 800.5(a)(2)(i) and contribute to an adverse cumulative effect to the Presidio cultural landscape.

The construction of the new high-viaduct and reconfiguration of the Park Presidio Interchange would result in the alteration of the stands of trees in the areas west and east of the Park Presidio Interchange and north of Lincoln Boulevard and south of Doyle Drive near the National Cemetery. In addition, a stand of trees in the area north of Doyle Drive near Merchant Road and one or more of the three palm trees that are located to the north of the existing low-viaduct structure in the New Commissary and Post Exchange parking lot would be removed. These trees are a part of the historic vegetation features of the cultural landscape. The loss of some of the trees from these specific locations would result in an adverse effect under 36 CFR 800.5(a)(2)(i) and contribute to an adverse cumulative effect to the Presidio cultural landscape.

There would be indirect adverse visual effects on the Presidio's cultural landscape under Alternative 5: Presidio Parkway. Key visual characteristics of the views of Doyle Drive are: the bridge's materials, color, form, massing, and the structure's decreasing elevation, from west to east, that reflects the decreasing elevation of the natural topography of the bluff. The existing Doyle Drive structure would be replaced with a new Doyle structure that would be visible from Crissy Field, the Main Post, and the Letterman area, and the Quartermaster Depot. Views of the new structure would lessen the integrity of setting, association, and feeling that currently exists at the various locations around the Presidio and would constitute as adverse indirect effect under 36 CFR 800.5(a)(2)(v) and contribute to an adverse cumulative effect to the cultural landscape of the Presidio.

Alternative 5, Presidio Parkway – Individual Historic Properties

This cumulative effects analysis considers the potential for the Presidio Parkway Alternative, in combination with known past, present, and future projects in the area, to adversely effect individual historic properties within the Focused APEs. The Presidio Parkway Alternative would introduce tunnels, a type of structure not currently used in Doyle Drive. Furthermore, portions of the new alignment would be shifted away from the existing Doyle Drive alignment. This effects analysis has already identified the direct and indirect adverse effects that this alternative would cause to the historic properties within the Focused APEs. The potential for this alternative to result in a cumulative effect to the historic properties, when compared to past, present, and future projects, is described below by individual property.

The Doyle Drive viaducts would not experience a cumulative effect under the Presidio Parkway Alternative because they would experience a direct adverse effect under this alternative. The Doyle Drive viaducts would be destroyed under the options of the Presidio Parkway Alternative. This action constitutes a direct adverse effect and therefore no cumulative effect is expected when compared with past, present, or future projects.

The Presidio Parkway Alternative would likely cause an adverse cumulative effect on the Golden Gate Bridge historic property. This property would experience a

direct adverse effect under the options of this alternative through the removal of Doyle Drive, which is a contributing element of the bridge property. It is possible that this effect, in combination with other current and future projects, would be cumulatively adverse. Other projects that involve the Golden Gate Bridge are on-going, however, the scope of the effects of these projects on the remaining portions of the Golden Gate Bridge property are not known at this time: the Golden Gate Bridge Seismic Retrofit Project, the Golden Gate Bridge Movable Median Barrier Project, Golden Gate Bridge Cable Restoration, and the Richardson Avenue Slip Ramp Project. It is not clear which features of the Golden Gate Bridge property would retain its integrity once these projects are completed, but it is presumed that these proposed projects would not threaten the NHL eligibility of the Golden Gate Bridge. It may be necessary, however, to re-define the contributing elements of the bridge property upon completion of the current project.

The Presidio Parkway Alternative would not cause an adverse cumulative effect on the Palace of Fine Arts property, which is listed in the NRHP, a designation that would not be affected by the Project. This historic property would not experience direct or indirect adverse effects under either option of this alternative. This alternative would not cause an adverse cumulative effect when considered in conjunction with past, present, and future projects. Neither of the known on-going projects appears likely to cause adverse effects (Richardson Avenue Slip Ramp Project or the Rehabilitation of the Palace of Fine Arts Projects). It is assumed that the rehabilitation project would be accomplished in a manner consistent with the *Secretary's Standards for the Treatment of Historic Properties* (36CFR part 68) and applicable guidelines [36 CFR 800.5(a)(2)(ii)], and would not “diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association” [36 CFR 800.5(a)(1)] of the Palace of Fine Arts Property.

The Presidio Parkway Alternative would not cause an adverse cumulative effect on archaeological site CA-SFR-6/26 and it would remain eligible for listing on the NRHP. This alternative would not cause direct or indirect adverse effects on known archaeological resources, nor does it appear that other known current and future projects would cause adverse effects to these resources that would be cumulative when considered with the current project.

Preferred Alternative, Refined Presidio Parkway – Presidio Impacts

The Preferred Alternative may result in an adverse cumulative effect on the Presidio NHL. This alternative will introduce new structural and visual elements into a part of the Presidio NHL that has already lost some historic integrity through the demolition of contributing buildings and structures. The viaducts, tunnels, and at-grade portions of the Preferred Alternative that will be constructed in this northeast corner of the Presidio NHL will not resemble the existing Doyle Drive facility in overall location, mass, and scale. In addition, the Preferred Alternative will require the destruction of additional contributing elements, namely Buildings 204, 230 and 670. The Preferred Alternative will also

require the moving and partial demolition of Building 201 to accommodate the project. Building 228, which flanks Halleck Street, will also be adversely affected because Halleck Street must be raised from its current elevation to cross over the tunnel and pass back down to the lower post, therefore altering its spatial relationship with Halleck Street. Buildings 201, 204, 228 and 230 are all located in the former Quartermaster Depot functional area of what is now the Main Post Planning District. This area had previously experienced a number of building losses due to the construction of Crissy Marsh. Therefore, the loss of additional structures will be a cumulative effect on the Presidio NHLD and on the Quartermaster Depot functional area in particular.

The Preferred Alternative will require alteration of contributing roadways, including: Young Street, Halleck Street, Marshall Road, Gorgas Avenue, Girard Road, Cowles Street, and Vallejo Street. The Preferred Alternative, therefore, will result in both the introduction of new construction, and the destruction of contributing buildings and structures, and when considered in conjunction with past, present, and future projects, will result in an adverse cumulative effect to the Presidio NHLD.

There will be direct effects to the cultural landscape elements of the Presidio NHLD under the Preferred Alternative due to the alteration and removal of historic features and the addition of non-historic features into the cultural landscape. The construction of the new Doyle Drive structure will result in the destruction or alteration of historic circulation features including Doyle Drive, Veterans Boulevard, Cowles Street, Lincoln Boulevard, Crissy Field Avenue, Battery Blaney Road, Marshall Street, Mason Street, Cowles Street, Gorgas Avenue, and Halleck Street. The construction of the new structure will alter the existing grade of the bluff, a historic topographic feature of the Presidio cultural landscape. The presence of a continuous bluff is a character-defining feature of the Presidio. Its removal or alteration will impact the integrity of the Presidio and will lessen the understanding of the development of the Presidio over time. In particular, the historic reasons for the location of the Main Post and the historic topographic and spatial relationship between the Main Post and the Lower Post areas on Crissy Field will be less apparent. The Main Post, located on land that slopes down toward the north, was sited along the edge of this natural bluff that overlooks the San Francisco Bay. This location served both practical and symbolic functions. It provided for views of the Bay and the Golden Gate Bridge, and symbolized the Spanish control of these features. This location offered convenient access to the area along the water's edge that provided safe anchorage for ships. The alteration and destruction of these historic topographic, circulation, and spatial organization features of the cultural landscape features will lessen the design, materials, workmanship, setting, feeling, and association that reflect:

- the spatial relationship of the Main Post, located upland of the Lower Post; and

- the service and supply land uses and activities and the related utilitarian nature of this portion of the Presidio.

This will constitute “physical destruction of, or damage to all or part of, the property” and “change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance” and as such is an adverse effect under 36 CFR 800.5(a)(2)(i) and contribute to an adverse cumulative effect to the Presidio cultural landscape.

The construction of the new high-viaduct and reconfiguration of the Park Presidio Interchange would result in the alteration of the stands of trees in the areas west and east of the Park Presidio Interchange, north of Lincoln Boulevard and south of Doyle Drive near the National Cemetery, a stand of trees in the area north of Doyle Drive near Merchant Road, and the removal of one or more of the three palm trees that are located to the north of the existing low-viaduct structure in the New Commissary and Post Exchange parking lot. These trees are a part of the historic vegetation features of the cultural landscape. The loss of some of the trees from these specific locations will result in an adverse effect under 36 CFR 800.5(a)(2)(i) and contribute to an adverse cumulative effect to the Presidio cultural landscape.

There will be indirect adverse visual effects on the Presidio’s cultural landscape under the Preferred Alternative. Key visual characteristics of the views of Doyle Drive are: the bridge’s materials, color, form, massing, and the structure’s decreasing elevation, from west to east, that reflects the decreasing elevation of the natural topography of the bluff. The existing Doyle Drive structure will be replaced with a new Doyle structure that will be visible from Crissy Field, the Main Post, and the Letterman area, and the Quartermaster Depot. Views of the new structure will lessen the integrity of setting, association, and feeling that currently exists at the various locations around the Presidio and will constitute as adverse indirect effect under 36 CFR 800.5(a)(2)(v) and contribute to an adverse cumulative effect to the cultural landscape of the Presidio.

Preferred Alternative, Refined Presidio Parkway – Individual Historic Properties

This cumulative effects analysis considers the potential for the Preferred Alternative, in combination with known past, present, and future projects in the area, to adversely effect individual historic properties within the APE. The Preferred Alternative will introduce tunnels, a type of structure not currently used in Doyle Drive. Furthermore, portions of the new alignment will be shifted away from the existing Doyle Drive alignment. This effects analysis has already identified the direct and indirect adverse effects that this alternative will cause to the historic properties within the APE. The potential for this alternative to result in a cumulative effect to the historic properties, when compared to past, present, and future projects, is described below by individual property.

The Doyle Drive viaducts will not experience a cumulative effect under the Preferred Alternative because they will experience a direct adverse effect under

this alternative. The Doyle Drive viaducts will be destroyed under the Preferred Alternative. This action constitutes a direct adverse effect and therefore no cumulative effect is expected when compared with past, present, or future projects.

The Preferred Alternative will likely cause an adverse cumulative effect on the Golden Gate Bridge historic property. This property will experience a direct adverse effect under the options of this alternative through the removal of Doyle Drive, which is a contributing element of the bridge property. It is possible that this effect, in combination with other current and future projects, will be cumulatively adverse. Other projects that involve the Golden Gate Bridge are on-going, however, the scope of the effects of these projects on the remaining portions of the Golden Gate Bridge property are not known at this time: the Golden Gate Bridge Seismic Retrofit Project, the Golden Gate Bridge Movable Median Barrier Project, Golden Gate Bridge Cable Restoration, and the Richardson Avenue Slip Ramp Project. It is not clear which features of the Golden Gate Bridge property will retain integrity once these projects are completed, but it is presumed that these proposed projects will not threaten the NHL eligibility of the Golden Gate Bridge. It may be necessary, however, to re-define the contributing elements of the bridge property upon completion of the current project.

The Preferred Alternative will not cause an adverse cumulative effect on the Palace of Fine Arts property which is listed in the NRHP. This historic property will not experience direct or indirect adverse effects under this alternative. This alternative will not cause an adverse cumulative effect when considered in conjunction with past, present, and future projects. Neither of the known on-going projects appears likely to cause adverse effects (Richardson Avenue Slip Ramp Project or the Rehabilitation of the Palace of Fine Arts Projects). It is assumed that the rehabilitation project will be accomplished in a manner consistent with the *Standards for the Treatment of Historic Properties* (36 CFR part 68) and applicable guidelines [36 CFR 800.5(a)(2)(ii)], and will not “diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association” [36 CFR 800.5(a)(1)] of the Palace of Fine Arts Property.

The Preferred Alternative will not cause an adverse cumulative effect on archaeological site CA-SFR-6/26 and it will remain eligible for listing on the NRHP. This alternative will not cause direct or indirect adverse effects on known archaeological resources, nor does it appear that other known current and future projects will cause adverse effects to these resources that will be cumulative when considered with the current project.

5.6.5 Visual Quality

Several of the projects and plans discussed in Section 5.5 have the potential to result in temporary and permanent visual changes within the landscape units and viewshed of the Doyle Drive Project. These projects and plans include the Letterman Digital Arts Center, Presidio Transit Center, Crissy Marsh Expansion,

Tennessee Hollow Restoration, Building Rehabilitation in the Presidio, and the Rehabilitation of the Palace of Fine Arts.

Of these projects several will involve rehabilitation of existing buildings (building rehabilitation in the Presidio and Rehabilitation of the Palace of Fine Arts) to preserve and restore their historic character which will result in minor improvements in the visual setting and character of the project area. Several projects will result in substantial improvements to the existing visual setting of the project area by expanding natural habitat areas (i.e., Crissy Marsh Expansion and Tennessee Hollow Restoration).

The Presidio Transit Center will result in a new transportation oriented use being located within the Main Post landscape unit. The visual character of this area consists of offices, warehouses, parking lots and roadways, and as such, the transit center in combination with the Doyle Drive Project will not result in a cumulatively significant change in the visual character of this area.

The Letterman Digital Arts Center has resulted in a dramatic visual change within the Main Post and Richardson Avenue Exit landscape units. The Digital Arts Center was the subject of a previous environmental impact statement. That report concluded that the Digital Arts Center will enhance the visual integrity of the Letterman area, improve views from many vantage points within the Presidio, and result in a visual scale more appropriate for the surrounding area. (Page 239, *Final Environmental Impact Statement and Planning Guidelines* for new development uses on 23 areas within the Letterman Complex, Presidio Trust, March 2000).

The Doyle Drive Project in combination with other projects will result in an overall beneficial effect on the visual environment, particularly when considering such projects as historic restoration, wetland enhancement, and removal of the elevated transportation corridor, which are all consistent with the plans and policies for the Presidio.