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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

March 1, 2006

REC'D MAR 03 2006

Gene Fong
Division Administrator
Federal Highway Administration
650 Capitol Mall Suite 4-100
Sacramento, CA 95814

Subject: Draft Environmental Impact Statement (EIS) for Doyle Drive Project –
South Access to the Golden Gate Bridge, San Francisco, CA (CEQ
#20050545)

Dear Mr. Fong:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act. Based on our review, we have rated the proposed project as Environmental Concerns-Insufficient Information (EC-2).

1

We recognize the importance of addressing the seismic, safety, and structural improvement needs for Doyle Drive and commend the Federal Highway Administration (FHWA) on a well-prepared Draft Environmental Impact Statement (EIS). Given the project's location within the Presidio and its proximity to the Golden Gate National Recreation Area, cultural institutions, and residential areas, we are concerned about potential adverse impacts to cultural and historic resources and traffic in neighboring communities. We are also concerned about potential human health impacts from construction-related emissions. We recommend that FHWA avoid and minimize these impacts to the maximum extent possible, and commit to specific mitigation measures in the Final EIS and Record of Decision. Please see the enclosed detailed comments.

2

3

EPA appreciates the opportunity to review this Draft EIS. When the Final EIS is released for public review, please send two copies to the address above (mail code: CED-2). If you have questions, please contact me at 415-972-3988 or Nancy Levin, the lead reviewer for this project. Nancy can be reached at 415-972-3848 or levin.nancy@epa.gov.

Sincerely,

for Duane James, Manager
Environmental Review Office
Communities and Ecosystems Division

Enclosures:

Summary of EPA Rating Definitions

Detailed Comments

cc: Leroy L. Saage, San Francisco County Transportation Authority
Jared D. Goldfine, Caltrans
Brian O'Neil, National Park Service
Craig Middleton, The Presidio Trust
James Metcalf, U.S. Department of Veterans Affairs

SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

ADEQUACY OF THE IMPACT STATEMENT

Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

EPA DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR
DOYLE DRIVE PROJECT – SOUTH ACCESS TO THE GOLDEN GATE BRIDGE, SAN
FRANCISCO COUNTY, CA, MARCH 1, 2006

Cultural and Historic Resources

The proposed project extends from the south end of the Golden Gate Bridge in San Francisco, through the Presidio of San Francisco, to the Palace of Fine Arts. This area is rich in historic and cultural significance. The Presidio is designated as a National Historic Landmark District (NIILD). As stated in the Draft Environmental Impact Statement (EIS), both build alternatives would have an adverse effect on the Presidio NHL and its contributing elements, individual historic properties, and the cultural landscape found on the Presidio (pages 3-113 to 3-116). Other historic properties in the area include a prehistoric archaeological site, historic viaducts, the Golden Gate Bridge, and the Palace of Fine Arts. According to the Draft EIS, the Federal Highway Administration (FHWA) has begun consultation under Section 106 of the National Historic Preservation Act (page 3-107). The Draft EIS states that a Memorandum of Agreement (MOA) and a variety of mitigation plans will be developed as part of the Section 106 consultation process (pages 3-116 to 3-120).

Recommendations:

Given the magnitude of potential impacts to cultural and historic resources, we recommend that the Final EIS include a more detailed discussion of mitigation measures and design guidelines to avoid, minimize and compensate for adverse impacts. We recommend that these measures be adopted in the Record of Decision (ROD).

4

Include in the Final EIS the completed Section 106 MOA and mitigation plans. Alternatively, discuss the process and timeline for completing the Section 106 consultation process.

5

Traffic and Transportation Impacts

The Draft EIS recognizes that the project could adversely affect traffic patterns on local roadways during construction and operation. Project construction will require short-and long-term roadway closures (page 2-61) that could increase traffic in some areas, reduce travel speeds, and divert traffic through neighborhood streets. New or modified access points may also affect pedestrian and bicycle operations.

The Draft EIS briefly discusses strategies to accommodate traffic during construction (page 3-68), and states that a "Transportation Management Plan" will be developed to minimize these traffic impacts. The Transportation Management plan will encourage use of alternative routes, use of transit, overall trip reduction, and interactive traffic monitoring to alleviate bottlenecks (page 3-90). The Draft EIS also states that the Transportation Management Plan will not be developed until after the preferred alternative is selected and during the final design, and that affected agencies would be consulted to develop the Plan (page 3-65).

Recommendations:

Include in the Final EIS a draft Transportation Management Plan with specific measures to minimize adverse traffic impacts to neighborhoods as a result of the construction and operation of the proposed project.

6

Include in the Final EIS specific measures to encourage the use of transit as a means of alleviating construction-related congestion.

7

In addition to soliciting transportation and transit agency feedback on the Transportation Management Plan, include in the Final EIS a commitment to consult with local residents, businesses, and other affected users (including bicyclists and pedestrians) of the Presidio and Golden Gate National Recreation Area in developing the Plan.

8

Construction-related Emissions

We commend FHWA for describing available dust control measures in the Draft EIS and encourage FHWA to commit to these measures in the Final EIS and ROD.

9

Construction emissions from the proposed project may result in human exposure to diesel exhaust, which includes particulate matter less than 2.5 microns in diameter (PM2.5). Older adults, people with heart and lung disease, and children are particularly sensitive to fine particle exposure. Studies have shown a significant association between exposure to PM2.5 and adverse health outcomes, including asthma, respiratory disease, and premature death. Given the adverse health effects for PM2.5 and diesel exhaust exposure, EPA recommends that the Final EIS include mitigation measures for these construction emissions.

10

The project's Air Quality Study (November 2004) identifies residential areas in and around the project study area that would be sensitive to air quality impacts of the project. The Final EIS should also specify the locations of schools, hospitals, open space/recreational areas (in addition to Crissy Field), and convalescent homes, if any, that could be affected by construction-related emissions.

11

Recommendations:

Identify in the Final EIS sensitive receptors in the project area, including children, elderly, infirm, and athletes, and minimize impacts to these populations.

12

Include a Construction Emissions Mitigation Plan for fugitive dust and diesel PM (DPM) in the Final EIS and adopt this plan in the ROD. EPA recommends the following mitigation measures be incorporated in the Construction Emissions Mitigation Plan, where feasible and appropriate, in order to reduce impacts associated with emissions of PM10, DPM, and air toxics from construction-related activities:

13

- Establish an activity schedule designed to minimize traffic congestion around the construction site.
- Utilize EPA-registered particulate traps and other appropriate controls to reduce emissions of diesel particulate matter and other pollutants at the construction site.
- Locate construction equipment and staging zones away from sensitive receptors such as children and the elderly as well as away from fresh air intakes to buildings and air conditioners.
- Use low sulfur fuel (diesel with 15 parts per million or less).
- Reduce trips and unnecessary idling from heavy equipment.
- Lease newer and cleaner equipment (1996 or newer).
- Periodically inspect construction sites to ensure construction equipment is properly maintained at all times.

14

Other Comments

- Section 3.3.4 Air Quality references the 2001 Transportation Improvement Program (TIP). Since the project is identified in the Draft EIS as being part of a conforming 2005 TIP, it is unclear why the 2001 TIP is referenced (page 3-161). This should be clarified or updated in the Final EIS.
- The project impact summary tables (Exhibits S-7 and S-8) include only permanent impacts of the project to the human and physical environment. We recommend that the summary table also include temporary impacts, so that the tables provide a complete summary of potential project effects.
- In accordance with Executive Order 13112, EPA recommends that the Final EIS identify proposed methods to minimize the spread of invasive species and utilize native plant and tree species where re-vegetation is planned.

15

16

17



Comments on the Doyle Drive Project DEIS/R

Reviewer: United States Environmental Protection Agency

Reviewer's Comment Number	Response	Database ID
1	Comment noted.	1210
2	Please refer to Responses 4 and 5.	1211
3	Please refer to Responses 4 and 5.	1212
4	The Avoidance, Minimization and/or Mitigation Measures discussion found in Section 3.2.11 was updated to provide additional information.	1214
5	The Avoidance, Minimization and/or Mitigation Measures discussion found in Section 3.2.11 was updated to provide additional information.	1215
6	A summary of the draft TMP is included in the FEIS/R, see Avoidance, Minimization and/or Mitigation Measures of Section 3.2.8 and Appendix K. The detailed TMP would be finalized during the final design phase of project.	1216
7	Transit would be an integral part of the TMP. A summary of the draft TMP is included in the FEIS/R, see Avoidance, Minimization and/or Mitigation Measures of Section 3.2.8 and Appendix K. The detailed TMP would be finalized during the final design phase of project.	1217
8	The Authority has made the commitment to continue an open dialog with all project stakeholders throughout the completion of this project. This will include agency and citizen advisory committees, public meetings, living room briefings, project website, and published media.	1218
9	The construction mitigation measures for reducing dust emissions that are identified in the Avoidance, Minimization and/or Mitigation Measures section of Section 3.3.4 of the FEIS/R are those required by the BAAQMD. In addition, those mitigation measures geared to reduce exhaust emissions from construction equipment, and that are identified in the same section, are required by Federal Regulations for construction activities that will occur on this project. The project commits to implementing the measures.	1219
10	The FEIS/R identified mitigation measures for reducing diesel particulate matter (PM 2.5) by adopting measures similar to those indicated in the Comment. The FEIS/R stated that these measures are required by the Federal Tier 4 emission regulations for diesel engines (See Avoidance, Minimization and/or Mitigation Measures of Section 3.3.4).	1819
11	The Community Facilities discussion in Section 3.2.4 of the FEIS/R discussed sensitive receptors in the area. These would include schools, hospitals, and residences. The mitigation measures identified in the Avoidance, Minimization and/or Mitigation Measures portion of the Air Quality Section (Section 3.3.4) of the FEIS/R are those required by BAAQMD Guidelines to reduce construction impacts at sensitive receptors to less than significant levels.	1220



Comments on the Doyle Drive Project DEIS/R

Reviewer: United States Environmental Protection Agency

Reviewer's Comment Number	Response	Database ID
12	See response to Comment 1220	1221
13	The mitigation measures identified in the comment are part of the FEIS/R, see the Avoidance, Minimization and/or Mitigation Measures of Section 3.3.4. Because they are either required by BAAQMD regulations or by Federal regulations, the mitigation plan will automatically be part of the ROD.	1222
14	See response to Comment 1222	1223
15	The text referred to in the comment has been dropped in the FEIS/R, see Regulatory Setting of Section 3.3.4. It is an old narrative that was written before the 2005 TIP was released. The previous paragraph of the DEIS/R was intended to replace it.	1224
16	This information was covered in the text, see the discussion of Temporary Impacts throughout Chapter 3. Temporary impacts are also covered in the mitigation monitoring plan if mitigation is deemed appropriate.	1225
17	See response to comment 1180. The EIS/R also does this by referencing BMPs, see Avoidance, Minimization and/or Mitigation Measures in Section 3.4.5. The source of standard BMPs is clarified in the response to comment 1792.	1226

March 20, 2006

Lee Saage, Project Manager
Doyle Drive DEIS/R Comments
San Francisco County Transportation Authority
100 Van Ness Avenue, 26th Floor
San Francisco, CA 94102



Re: Comments on Doyle Drive DEIS/R

Dear Mr. Saage:

On behalf of the Golden Gate Bridge, Highway and Transportation District staff, I submit the following comments on the Draft Environmental Impact Statement/Report and Draft Section 4(f) Evaluation for Doyle Drive, South Access to the Golden Gate Bridge, December 2005. Comments are presented in the order they occur in the document.

Summary

Page v -- The footnote at the bottom of the page explains why HOV lanes were eliminated from further consideration and not carried forward into project alternatives. Since the time of preliminary alternatives screening, GGBHTD staff has been working with SFCTA on plans for Bus Rapid Transit on Geary Blvd. and Van Ness Avenue. Please confirm that these plans do not foresee extensions to Doyle Drive via Park Presidio Blvd. or Lombard Street. Otherwise, HOV lanes on Doyle Drive could be effective and merit further consideration as an element of the project.

1

Page vi -- The description of the No-Build Alternative references interim repairs and ongoing maintenance as requirements to keep the roadway in service. However, it also notes that a weight restriction could be designated without appropriate maintenance. Please clarify whether weight restrictions will be required for this project alternative. If weight restrictions are required, the rerouting of heavy vehicles (such as buses) should be addressed in the document. If weight restrictions are not required, is there a maintenance cost associated with this alternative that should be reflected in Exhibit S-6?

2

Page viii -- The description of the Replace and Widen Alternative references access to the Presidio via on and off ramps to Merchant Road at the GGB Toll Plaza. It should be clarified that these ramps lead to Lincoln Blvd. and the Presidio via roads that service GGBHTD facilities such as its maintenance shops, the administration building, and Bridge visitor areas. Merchant Road and other GGBHTD service roads are not designed to provide access to the entire Presidio.

3

Page ix -- The description of the Presidio Parkway Alternative should clarify whether the design option for a new slip ramp (Merchant Ramp) between northbound Doyle Drive and the GGB east parking lot is included in the project and should be consistent with Exhibit S-6, where this ramp is shown, and Exhibit S-7.

4

Page xiii -- Exhibit S-7, Traffic and Transportation, should show public transit impacts.

5

Comments on Doyle Drive DEIS/R
March 20, 2006

Page 2

Chapter 1

Page 1-9 - Description of existing condition of Doyle Drive suggests that, even with repair and maintenance, Doyle Drive could be closed or restricted. Please reconcile these statements with later descriptions of the feasibility, cost and other impacts of the No Build Alternative.

6

Page 1-10 - Please clarify that the ramps at the GGB Toll Plaza do not provide "direct" access from Doyle Drive to the Presidio. The ramps are located in the Toll Plaza area and connect to Merchant Road on the west and GGB service roads on the east, which then connect to Lincoln Blvd. Access between Doyle Drive and the Presidio is currently "indirect" via these roads located within the Toll Plaza area. It should be noted that lack of direct Presidio access also impacts GGBHTD facilities.

7

Page 1-14 - The footnote at the bottom of Exhibit 1-7 refers to bridge tolls and value pricing as sources of other local funds for the project. Please clarify that Golden Gate Bridge tolls are not committed to funding this project.

8

Chapter 2

Page 2-2 - Please revise Exhibit 2-1 to show the Toll Plaza area extending south to just north of Lincoln Blvd. The Merchant Rd. ramps are located within the Toll Plaza area.

9

Page 2-24 (and Exhibit 2-7) - Please clarify that in addition to the Transit Exclusive Alternative there was consideration of HOV lanes and general traffic lanes on Doyle Drive. As stated in the above comment regarding Page v of the Summary, this option was eliminated due to apparent ineffectiveness recognizing that there are no plans for continuing HOV lanes to the north or south of Doyle Drive. However, we ask that this assumption be confirmed relative to recent efforts by SFCTA and MUNI to study BRT along Van Ness Avenue and Geary Blvd. Specifically, is SFCTA considering extending transit preferential improvements along Park Presidio or Lombard Street?

10

Page 2-27 - This page contains further statements regarding the infeasibility of the No Build Alternative that should be reflected in characterizing the impacts of this alternative elsewhere in the document.

11

Page 2-30 - The next-to-last sentence of the discussion of a Moveable Barrier is not consistent with the conclusion stated in the last sentence.

12

Page 2-31 - As noted before, Doyle Drive does not have direct access to Presidio at Merchant Road. These ramps are located within the GGB Toll Plaza area.

13

Pages 2-32 to 2-37 - As noted before, No Build Alternative should be revised to provide required maintenance to avoid weight restrictions that would require buses and trucks to take other routes and to provide appropriate seismic response. Otherwise, this alternative should be described as being infeasible or unacceptable.

14

Page 2-43 - The description of Alternate 5 includes a statement about parking the District's future Moveable Median Barrier machine in the median of Doyle Drive. This statement should also appear in the description of Alternate 2.

15

Page 2-49 - The description of the slip ramp option should be revised to explain that the ramp would provide direct access from westbound Doyle Drive to the Presidio and the GGB East

16

Comments on Doyle Drive DEIS/R
March 20, 2006

Page 3

Parking Lot as an improvement to the existing condition. It should also note that the existing weaving section between Doyle Drive, Veterans Blvd. and the exit ramp is substandard in its length in addition to being congested. District requests that the slip ramp be incorporated into the basic design of Alternative 5 rather than being carried forward as a design option since it is germane to the project purpose and objectives related to improving traffic safety and functionality as an approach to GGB.

16
cont

Page 2-49 – The description of the eastern end access should include references to new bus stops and pedestrian pathways that provide inter-modal access improvements directly associated with this project and responsive to the project objectives.

17

Page 2-50 and 2-51 – As stated before, the No Build Alternative should be represented as being infeasible or unacceptable. Otherwise, the full maintenance and rehabilitation cost of this alternative should be provided.

18

Pages 2-51 through 2-63 – District is very concerned about construction staging and traffic-related impacts to GGB and GGT operations as well as to concurrent GGB construction projects. Any temporary and long-term closures of Lincoln Avenue near the GGB and of the ramps in the Doyle Drive/Veterans Blvd. interchange as shown on Exhibits 2-36 and 2-37 could negatively impact the GGB. Construction timing should also be coordinated with GGB construction work.

19

Chapter 3

Page 3-2 - It should be noted that the GGB along with its support facilities and visitor areas is being considered a recreational land use within the project study area in addition to being a transportation facility. The affect of the alternatives on use and enjoyment of the GGB by visitors is addressed in Section 3.2.2. In particular, on Pages 3-28 through 3-31, the District is concerned about temporary impacts of construction and construction detours that could increase traffic through the visitor areas east of the Toll Plaza. As stated before, the service roads within these visitor areas are not designed to accommodate high volumes of through traffic. The project should avoid, minimize and/or mitigate negative impacts.

20

Page 3-13 – Description of “Temporary Impacts” should note whether impacts are expected to existing transit services (GGT and MUNI) that currently use Doyle Drive.

21

Page 3-14 – As stated before, the No Build alternative should be clarified as being infeasible or unacceptable unless it includes adequate maintenance and rehabilitation to avoid weight restrictions and to address seismic response. Such maintenance and rehabilitation should be included in the project description and environmental evaluation.

22

Pages 3-22 and 3-31 – It should be noted what impacts (if any) the Diamond and Circle Drive Options for the Parkway Alternative will have on the north- and southbound bus stops at Richardson and Lyon streets.

23

Page 3-23 - It should be noted that the Merchant road slip ramp would provide direct access between Doyle Drive and the Fort Scott area of the Presidio, as well as to the GGB visitor area and NPS Area A without entering the Toll Plaza area.

24

Page 3-28 – DEIS’ description of the East Parking Lot location should be described as “east” of the Golden Gate Bridge Toll Plaza, not “south”.

25

Comments on Doyle Drive DEIS/R
March 20, 2006

Page 4

Page 3-32 – As stated before, the No Build Alternative should be consistently clarified as including or excluding adequate maintenance and rehabilitation to be either feasible and fully evaluated or not.

26

Pages 3-64 and 3-65 – The Veterans Blvd. to south of Merchant Road segment should also note that deficient service levels, lane changes and weaving are associated with accessing the Presidio in addition to GGB and its viewing areas.

27

Page 3-68 and 3-89 – It should be noted that traffic reduction strategies proposed for the Transportation Management Plan could adversely affect GGB toll revenue generation. Toll revenues are needed to fund bridge operations and capital projects, and to subsidize public transit services. The proposed 5 to 10 percent traffic reduction spread over four to five years of construction could have significant impact on the District's ability to maintain services to the public. District requests that the project consider this possibility and mitigate the financial impact.

28

Pages 3-68 and 3-91 – DEIS should note whether the Transportation Management Plan will consider potential negative impacts to existing bus transit operations as part of the "narrower lanes, alignment adjustments or more restrictive turning radii" anticipated during project construction.

29

Pages 3-69 through 3-72 – As stated before, District is very concerned about road closures that would increase traffic on the service roads around the GGB and affect District operations and the use and enjoyment of the GGB by visitors. The Transportation Management Plan is cited as the avoidance, minimization and/or mitigation for construction-related impacts. Since construction could go on for 5 years and since alternate routes may not be designed to accommodate higher traffic volumes, the cost of implementing the TMP could be significant. Does the project estimate this cost and is this cost included in the project costs?

30

Pages 3-84 and 3-85 – As stated before, District requests the Merchant Road slip ramp be included in the basic configuration of Alternative 5 rather than as a design option since it is needed to address the inadequate weave condition identified.

31

Page 3-88 – As stated before, the No Build Alternative should be consistently clarified as including or excluding adequate maintenance and rehabilitation to either be feasible and fully evaluated or not. In this case, it appears that the evaluation assumes adequate maintenance and rehabilitation is provided to maintain existing functionality. What are the maintenance and rehabilitation costs associated with this assumption and why are they not attributed to the cost of this alternative?

32

Page 3-88 – As stated before, impacts (temporary or permanent) to existing public transit services should be presented.

33

Page 3-89 – Discussion of Alternative 5 implies that the Merchant Road slip ramp is a contributing element of the project rather than an option.

34

Page 3-90 – It should be noted that GGT services are assumed to operate at Year 2000 service levels consistent with the choice of Base Year 2000 GGB traffic levels since more recent experience reflects a downturn in traffic and transit ridership associated with the post-2000 economic recession.

35

Comments on Doyle Drive DEIS/R
March 20, 2006

Page 5

Pages 3-91 and 3-92 – It should be noted that temporary re-routing of buses can be more difficult and costly than detours for general traffic because of operating characteristics of buses, need for bus stops and advance notification to passengers. Duration, avoidance, minimization and/or mitigation for construction impacts on transit services should be included in the TMP.

36

Page 3-91 – As stated before, the No Build Alternative should be clarified consistently. In this case, there is no mention of weight restrictions that could result in bus route changes.

37

Pages 3-91 and 3-92 – There is mention of transit stops on Richardson associated with Alternate 5, but no explanation is provided. Please elaborate on the differences between alternatives associated with transit-related elements of the project. Does the project contain inter-modal improvements benefiting public transit?

38

Page 3-99 – The Merchant Road slip ramp would serve the GGB facilities, visitor areas and areas of the Presidio such as Fort Scott and Battery East. Please change these descriptive references to clarify the purpose of this Alternative 5 design feature here and in other parts of the report.

39

Chapter 4

Pages 4-3 and 4-14 – District disagrees with conclusion that there would be no significant temporary impact to GGB operations and use and enjoyment of visitor areas under CEQA resulting from construction detours required by the build alternatives. As stated before, the roads serving these GGB areas could experience significant increases in traffic with proposed closures of roadways in the Park Presidio/Veterans Blvd/Doyle Drive interchange and other locations. The road under the Toll Plaza, for example, bisects visitor areas that have significant pedestrian, bicycle and tour bus activity. Consistent with the NEPA section, the CEQA section should include reference to a Transportation Management Plan, developed in coordination with the District and funded by the project, to minimize traffic impacts during construction.

40

Page 4-14 – Description of the No Build Alternative understates the impact on the environment by not considering the long-term maintenance and rehabilitation that would be necessary to maintain its existing function as the south approach to the GGB.

41

Page 4-14 – Insert the word “and” between “Plaza” and “via” in the fourth line of the last paragraph.

42

Page 4-15 – The new slip ramp may be best described as improved access to the Presidio via a direct connection from northbound Doyle Drive to Lincoln Avenue which would avoid the Toll Plaza.

43

Chapter 5

Page 5-7 – Description of GGB Seismic Retrofit should reference Phase 3 as well. Description of GGB Moveable Median Barrier should reference a storage area for the operation of the transfer machine in the median of Doyle Drive.

44

Page 5-7 – Description of Highway 101 widening having a reversible HOV lane is not correct.

45

Page 5-9 – Description of temporary delays due to construction should be revised to include a Transportation Management Plan developed for the project. Also, please elaborate on what is meant by “measures that would be implemented ... such as ... increased transit service.”

46

Comments on Doyle Drive DEIS/R
March 20, 2006

Page 6

Page 5-10 – As stated before, the description of the No Build Alternative understates its impacts by overlooking the maintenance and rehabilitation that would be required to maintain its function. | 47

Pages 5-15 and 5-18 – Please remove reference to the Golden Gate Bridge Public Safety Railing Project as an ongoing project. This project was implemented in 2004. | 48

Page 5-19 – Please remove reference to the Golden Gate Bridge Toll Plaza Redesign. There is no such project of the District. | 49

Chapter 7

Page 7-6 – As stated before, please revise the description of the Merchant Road slip ramp. | 50

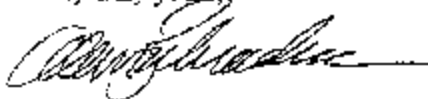
Page 7-38 – As stated before, please revise the description of the Transit Exclusive Alternative. | 51

Page 7-44 – Results of analysis of ramp metering and elimination of Veteran's Blvd. on-ramp should add that there would be negative impacts on recreational uses of the GGB visitor areas. | 52

Page 7-46 – Description of temporary road closures due to construction should acknowledge the impacts of increased traffic on alternate routes that would negatively affect use and enjoyment of GGB visitor areas. A Transportation Management Plan is required to adequately address traffic impacts resulting from the construction of the project. | 53

Thank you for the opportunity to provide these comments. Please contact me or Denis Mulligan, District Engineer, if you have any questions.

Very truly yours,



Alan R. Zahradnik
Director of Planning

ARZ/kmp

- c: Celia Kupersmith
- Denis Mulligan
- Janet Tarantino
- David Miller
- Kary Witt
- Maurice Palumbo



Comments on the Doyle Drive Project DEIS/R

Reviewer: GGBHTD

Reviewer's Comment Number	Response	Database ID
1	BRT in this corridor is currently not a priority of the SFCTA and is beyond the scope of this project.	1689
2	Weight restrictions are not required as part of the build project alternatives. Weight restrictions were contemplated under the no-build scenario since ongoing maintenance and repairs are unscheduled and minimal.	1690
3	The changes to the description of the Replace and Widen Alternative, as appropriate, were made in Section S.4 of the FEIS/R.	1691
4	The changes to the description of the Presidio Parkway Alternative, as appropriate, were made in Section S.4 of the FEIS/R.	1692
5	The summary table show in Exhibit S-9 was updated to include Transit and indicate that there are no significant changes to anticipated future transit conditions for any alternative.	1693
6	Both Section 1.4.2 Structural Degradation and 2.4.1 No-Build Alternative indicate that without extensive maintenance, the facility could have weight restrictions.	1694
7	The changes to the description of the Vehicular Access into the Presidio, as appropriate, were made in Section 1.4.2 of the FEIS/R.	1695
8	The changes to the footnote of Exhibit 1-7, as appropriate, were made in the FEIS/R.	1696
9	The changes, as appropriate, were made in the FEIS/EIR.	1697
10	BRT in this corridor is currently not a priority of the SFCTA.	1698
11	The No-Build Alternative does not meet the project need, purpose and objectives but is included to provide the baseline for existing environmental conditions and future travel conditions against which all other alternatives are compared. The impacts of a No-Build scenario are described in Section 1.4.2 Project Need, of the FEIS/R.	1699
12	The changes to the discussion of the Moveable Barrier in Section 2.3.4, as appropriate, were made.	1700
13	The FEIS/R clarifies that Presidio access is through Toll Plaza area.	1701



Comments on the Doyle Drive Project DEIS/R

Reviewer: GGBHTD

Reviewer's Comment Number	Response	Database ID
14	Caltrans is executing an interim rehabilitation project of the high-viaduct for FY 2006/07 that plans to remove the existing paint system, remove and replace various steel elements and connection rivets due to sectional loss, and repaint the steel truss spans and the steel approach spans. This project is intended to extend the service life of the high-viaduct by ten years, until the facility is replaced. The interim repairs are expected to maintain the current level of safety and do not constitute a retrofit or rehabilitation. Maintenance funds are not steady and are programmed pending other priority needs within the District. Since the maintenance funds necessary to keep the existing facility to current standards are not guaranteed, the No-Build does not meet the purpose and need of the project.	1702
15	The statement regarding parking a Moveable Median Barrier Machine in the median was added to the discussion of Alternatives 2, 5 (Section 2.4) and the Preferred in Section 2.5.	1703
16	The description of Alternative 5 was updated for the FEIS/R in Section 2.4.3. Weaving issues were covered in Traffic Section (see discussion of Segment Weaving under Permanent Impacts in Section 3.2.8). It was determined that the slip ramp will not be carried forward as part of the preferred alternative for the project (see Section 2.5.1)	1704
17	The following text was added to the description of the Presidio Parkway Alternative in Section 2.4.3 of the FEIS/R: Included in both the Diamond and Circle Drive options are extended bus bays on both sides of Richardson Avenue which will accommodate up to four buses each and improved crosswalks to provide safer and enhanced pedestrian circulation in the area. The extended bus bays will keep the buses out of the main flow of traffic during stops, provide safer merging capability for the buses and will facilitate transfers between Golden Gate Transit, Muni and PresidioGo vehicles.	1705
18	Maintenance funds are not steady and are programmed pending other priority needs within the District. Since the maintenance funds necessary to keep the existing facility to current standards are not guaranteed, the No-Build Alternative does not meet the purpose and need of the project.	1706
19	Preliminary construction staging activities for the Preferred Alternative are described in Section 2.9.1. The TMP developed for this project will involve the GGBHTD to ensure coordination with any GGB construction activities. The TMP will also acknowledge possible detours for GGT bus routes when detours are necessary, especially with weekend closures. Detouring needs to be coordinated with GGT to minimize impacts on operations and riders. The draft TMP will be included in Appendix K.	1707
20	During the construction period all efforts will be made to minimize traffic related impacts to the GGB visitor area. Details will be provided in the Traffic Management Plan to be prepared before the start of construction. Development of the TMP will include coordination with the GGBHTD.	1708
21	The discussion of temporary impacts to transit service is discussed in the Temporary Impacts section of Transit Section 3.2.9. Text was added to this section that temporary bus route detours would be necessary during the two full weekend closures.	1736



Comments on the Doyle Drive Project DEIS/R

Reviewer: GGBHTD

Reviewer's Comment Number	Response	Database ID
22	Caltrans is executing an interim rehabilitation project of the high-viaduct to extend the service life of the high-viaduct by ten years, until the facility is replaced. The interim repairs are expected to maintain the current level of safety and do not constitute a retrofit or rehabilitation. Maintenance funds are not steady and are programmed pending other priority needs within the District. Since the maintenance funds necessary to keep the existing facility to current standards are not guaranteed, the No-Build Alternative does not meet the purpose and need of the project.	1709
23	In July 2006, Alternative 5 with the Diamond Interchange option was selected as the Preferred Alternative. The Preferred Alternative will include extended bus bays on both sides of Richardson Avenue and improved crosswalks in the area. The extended bus bays will provide safer merging capability and facilitate transfers between various services. The project team will continue to work with GGBHTD to develop the TMP and minimize impacts.	1737
24	The text under the discussion of Fort Scott for the Presidio Parkway Alternative in Section 3.2.1 was revised.	1710
25	The edits were made in the description of the East Parking Lot in the Affected Environment of Section 3.2.2 of the FEIS/R.	1738
26	Maintenance funds are not steady and are programed pending other priority needs within the District. Since the maintenance funds necessary to keep the existing facility to current standards are not guaranteed, the No-Build Alternative does not meet the purpose and need of the project.	1711
27	In the discussion of the Existing Traffic Conditions in Section 3.2.8, it was clarified that the Presidio access is through Toll Plaza area (Golden Gate Bridge Viewing area).	1712
28	While the TMP will incorporate elements to encourage commuters to use other modes during construction, the facility will still be available for automobile commuters. It is anticipated that the complete closure of Doyle Drive east of the Park Presidio Intechange would occur on two weekends, however the GGB would still be open and accessible from other routes. The TMP will include a plan to address anticipated impacts of the extended closures including any proposed mitigation.	1713
29	The transit section (Section 3.2.9) of the FEIS/R was enhanced. However, the buses are currently operating in lanes narrower than the proposed lanes.	1739
30	Cost to implement the TMP is included in the total project cost. Costs are currently estimated. However, the exact cost associated with the TMP will not be availble until final construction staging is determined with the plan to mitigate and minimize these impacts. While the TMP will incorporate elements to encourage commuters to use other modes during construction, the facility will still be available for automobile commuters. It is only anticipated that the complete closure of Doyle Drive east of the Park Presidio Interchange would occur on one (possibly two weekends) however the GGB would still be open and accessible from other routes. With the refinement of the proposed staging of construction, it is anticipated that the construction time will be reduced to less than four years.	1714



Comments on the Doyle Drive Project DEIS/R

Reviewer: GGBHTD

Reviewer's Comment Number	Response	Database ID
31	The Merchant Road slip ramp was not selected as part of the Preferred Alternative. Please see Section 2.5.1 for details regarding the screening of this element and development of the Preferred Alternative.	1715
32	Maintenance funds are not steady and are available pending other priority needs within the District. Since the maintenance funds necessary to keep the existing facility to current standards are not guaranteed, the No-Build Alternative does not meet the purpose and need of the project.	1716
33	Any temporary or permanent impacts from the project will be mitigated and presented in the Transportation Management Plan and the enhanced Transit section of the FEIS/R, see Section 3.2.9.	1740
34	This text was removed from the description of Alternative 5 in Section 3.2.8.	1717
35	Comment noted	1718
36	Text was revised as suggested in the Avoidance, Minimization and/or Mitigation Measures section of 3.2.9.	1719
37	Caltrans is executing an interim rehabilitation project of the high-viaduct. This project is intended to extend the service life of the high-viaduct by ten years, until the facility is replaced. The interim repairs are expected to maintain the current level of safety and do not constitute a retrofit or rehabilitation.	1720
38	The discussion under Travel Time in the transit section (Section 3.2.9) of the FEIS/R was expanded to include the new transit stops on Richardson. Description of the transit stops are also provided in the description of both Alternative 5 (Section 2.4.3) and the Preferred Alternative (Section 2.5.1).	1721
39	The text under Permanent Impacts to Alternative 5 in Section 3.2.10 in the FEIS/R is revised as follows: The Merchant Road Slip Ramp Option which would serve the Golden Gate Bridge facilities, visitor areas and areas of the Presidio such as Fort Scott and Battery East, would require the removal of a row of trees along the north side of Doyle Drive, as well as the removal of the road of apartment builds along Armistead Road.	1722
40	The criteria for impacts under CEQA vary from the impact analysis under NEPA. Based on the significance criteria applied to Traffic/Transportation, it has been determined that there are no significant impacts under CEQA. Mention of the TMP has been included in the CEQA discussion.	1723
41	Maintenance funds are not steady and are available pending other priority needs within the District. Since the maintenance funds necessary to keep the existing facility to current standards are not guaranteed, the No-Build Alternative does not meet the purpose and need of the project.	1724



Comments on the Doyle Drive Project DEIS/R

Reviewer: GGBHTD

Reviewer's Comment Number	Response	Database ID
42	The edit was made.	1725
43	The edit was made.	1726
44	The description of GGB Seismic Retrofit was updated in Section 5.5 of the FEIS/R to reference Phase 3. However, the moveable median barrier is not part of this project though current plans would not preclude its addition in the future.	1727
45	At the beginning of the project study, a reversible HOV was under consideration for Highway 101 in Marin county. This alternative has since been dropped. The description in Section 5.5 of the FEIS was updated to reflect the current description.	1728
46	As stated in Section 5.6.1 a Transportation Management Plan will be developed prior to construction of the project. The level of impact will be difficult to determine until the construction plans are finalized.	1729
47	Comment noted.	1730
48	The edit was made in Section 5.5 of the FEIS/R.	1741
49	The reference was removed from the FEIS/R.	1731
50	The EIS/R text was revised as follows: The Merchant Road Slip Ramp Option which would serve the Golden Gate Bridge facilities, visitor areas and areas of the Presidio such as Fort Scott and Battery East, would require the removal of a row of trees along the north side of Doyle Drive, as well as the removal of the road of apartment builds along Armistead Road.	1732
51	BRT in the corridor is currently not a priority. The description of the Transit Exclusive Alternative stands as is pending further consideration by SFCTA.	1733
52	Ramp metering and elimination of the Veteran's Blvd on-ramp is not part of the Preferred Alternative, therefore there would be no negative impacts on the recreational uses of the GGB visitor area.	1734
53	The impacts of the temporary road closures are described under the Preferred Alternative throughout Chapter 3 in the FEIS/R. The Transportation Management Plan would be finalized during detailed design and will address the traffic impacts resulting from the construction of the project.	1735



United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94123

IN REPLY REFER TO:

A88 (GOGA - PLAN)

MAR 31 2006

José Luis Moscovich
San Francisco County Transportation Authority
100 Van Ness Avenue, 25th Floor
San Francisco, CA 94102

Dear Mr. Moscovich:

Subject: Golden Gate National Recreation Area Comments on Doyle Drive Draft Environmental Impact Statement/Report

The Golden Gate National Recreation Area (GGNRA) would like to express our appreciation to the San Francisco County Transportation Authority for the leadership it has provided during the preparation of the Doyle Drive Environmental Impact Statement/Report (EISI/R) and to the spirit of creativity and openness that it has sustained among the complex team of cooperating agencies and the public. Replacing Doyle Drive within the boundary of a National Park and National Historic Landmark District is a challenging and complicated task with great public and private interest. We salute your efforts to correct the unsafe conditions on Doyle Drive while causing the least possible harm and disruption to the natural, cultural and recreational resources of the Presidio.

Doyle Drive serves a critical role in the performance of our mission to preserve and enhance the natural environment and cultural resources of the coastal lands north and south of the Golden Gate for the inspiration, education, and recreation of people today, and for future generations by linking park sites to the north and south of the Golden Gate Bridge. Improving the unsafe conditions that currently exist on Doyle Drive is one of our highest transportation priorities.

For the past 6 years, GGNRA, acting in its capacity as a Cooperating Agency for the Doyle Drive Environmental and Design Study has participated in support of the San Francisco County Transportation Authority's (SFTA) efforts to correct the unsafe conditions that currently exist on Doyle Drive, the south access to the Golden Gate Bridge. We are committed to the project and have devoted significant resources to the preparation and review of the Environmental Impact Statement/Report and the technical studies that analyze project impact on the National Park and neighboring areas.

Prior to the conversion of the Presidio of San Francisco from an Army Installation to a National Park on October 1, 1994, GGNRA prepared The Presidio of San Francisco General Management Plan Amendment (July 1994) which established the following five objectives for the replacement of Doyle Drive. All of these objectives have been adopted in the Doyle Drive DEIS/R.

- To redesign the Doyle Drive corridor as a parkway rather than a freeway
- To respect the Presidio of San Francisco's status as a national historic landmark district in redesign options
- To 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
- To improve the Presidio of San Francisco entrance and circulation features as part of the Doyle Drive redesign
- To maintain the functions that the Doyle Drive corridor serves as part of the regional and city transportation network

The parkway concept was intended to blend the roadway into the sensitive setting of the Presidio, a National Historic Landmark District, by breaking up the mass and scale of the roadway. This lighter-handed approach was also intended to result in a traffic calming effect underscoring that motorists are no longer on a freeway but rather within the boundaries of a National Park and in a transition zone between the freeway that ends at the Golden Gate Bridge and the urban streets that begin at Richardson Avenue. Natural, cultural and recreational resource specialists from GGNRA staff have worked closely with the transportation agencies and consultants to share with them our knowledge of the Presidio's unique resources to insure that every possible effort was being taken to minimize harm to the National Park while implementing the National Park's vision for the transformation of Doyle Drive from a freeway to a parkway.

These efforts have resulted in Alternative 5, the Parkway Alternative, which achieves our vision for Doyle Drive and achieves the objectives outlined in the project's statement of Purpose and Need. GGNRA supports the Parkway Alternative's the Hook Ramp Option over the Loop Ramp Option because of the Loop Ramps greater impacts to natural resources and visual impacts from Crissy Field and the San Francisco Bay.

We also support the Diamond Option which preserves the YMCA pool rather than Circle Option which would require demolition of the pool. We do not see that the traffic improvements that result from the Merchant Road Slip Ramp Option are worth its construction cost or its impacts to the National Park. Therefore, we do not support including it in the Doyle Drive project.

1
Cont

The application of Federal Highway Administration (FHWA) Context Sensitive Design philosophy to Doyle Drive and the development of planning and design standards in response to the sensitive setting of the Presidio, a National Historic Landmark District (NHL) has resulted in a narrower, slower parkway that responds to its surroundings and minimizes harm to National Park resources. Numerous exceptions to Caltrans design standards have been applied for and granted that have helped move the roadway away from the Cavalry Stables and narrow Doyle Drive's width between the National Cemetery and Batteries Blaney, Sherwood and Slaughter so that these coastal defense batteries that are contributing elements to the NHL could be preserved. Efforts to modify Caltrans' design standards have continued beyond release of the Draft environmental Impact Statement/Report (DEIS/R) in support of design refinements that would curve and separate the elements of causeway over Tennessee Hollow, proposed in the Parkway Alternative, to allow the maximum possible level of light under the structure in an effort to insure the viability of the proposed restoration of a functioning riparian corridor and freshwater marsh transition to Crissy Marsh and the expansion of "three habitats that are disappearing statewide - riparian, freshwater wetland, and tidal wetland" General Management Plan Amendment (GMPA, p.38). These modifications to Caltrans design standards to preserve and protect park resources has resulted in a narrower, more curvilinear parkway that will help slow down drivers as they approach the city streets to the east of the Presidio.

The tunnel components of the parkway reestablish links within the Presidio that were severed when Doyle Drive was constructed. The link over the tunnel adjacent to the National Cemetery will give park visitors an opportunity to experience the Coastal Defense Batteries sited on the serpentine bluffs above Crissy Field. The coastal batteries protected San Francisco from military invasion from this prominent position with commanding views over San Francisco Bay. Pedestrian links over the tunnel will reconnect this area which is virtually inaccessible to visitors today to the National Cemetery and the Main Post allowing them to experience the batteries, spectacular views of San Francisco Bay and The Golden Gate Bridge, as well as the unique habitat along the coastal bluffs.

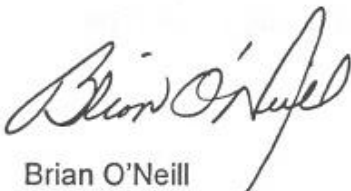
Our comments on the Draft Environmental Impact Statement/Preliminary Draft Environmental Impact Report and Draft Section 4(f) Evaluation are attached. We hope that our comments will contribute to the production of Final EIS/R that fully assesses the environmental impacts of the Doyle Drive replacement project on the Presidio of San Francisco, a National Park and National Historic Landmark District with unique cultural, natural and recreational resources. It is evident that considerable effort has been taken to adapt the alternatives in ways that are intended to minimize harm to the National Park.

The DEIS acknowledges unavoidable adverse effects to recreational, natural and cultural resources to include adverse effects to the NHL. We are confident that the ongoing workshops to further reduce project impacts on park resources will continue to improve the project as it moves from planning into design. We look forward to continuing our participation in these efforts to minimize harm to the National Park and to develop design treatments that render the Parkway Alternative compatible with the surrounding National Historic Landmark District and to develop of measures and treatments to mitigate adverse impacts to recreational, natural and cultural resources.

We would like to express our appreciation for the efforts taken by the project's Cooperating Agencies, San Francisco Planning and Urban Research Association (SPUR) and the transportation consultants who have all worked tirelessly to help achieve our mutual goal of replacing Doyle Drive with a parkway. We would also like to recognize the efforts of Michael Painter whose concept for a Parkway through the National Park exceeds even our own vision for a dramatic approach to the Golden Gate Bridge and a magnificent entrance to San Francisco and the National Park.

As a cooperating agency under National Environmental Policy Act (NEPA), the GGNRA will continue to work with the transportation agencies in developing solutions that achieve all project goals. If you have any questions or concerns, please call Rick Foster, NPS Doyle Drive Project Liaison, at (415) 561-4472.

Sincerely,



Brian O'Neill
General Superintendent

Doyle Drive Draft EIS Comments March 29, 2006

Comment Number	Page Number	Comment Description	Initials
1	VI	The overall width of the parkway is not stated	
2	xiii	It appears that the Circle Option increase the number of buildings removed to 14. Please confirm.	
3		The burial of natural topography at the eastern end of the bluff's (over the tunnel) is not included.	
4	xvii	The shade cast by the causeway could effect the movement of low-flying avian species through the wildlife corridor that links Crissy Marsh with Tennessee Hollow.	
5		Tunnels – Include the need for careful evaluation of subsurface conditions during construction for design and installation of hydrologic conveyance system. In addition to the pre-design geotech work, a careful evaluation of subsurface conditions would also need to be done during construction to inform and refine the actual installation of the drains.	
6	Section 3.2.1	The shade evaluation should be more thoroughly addressed in this section as it will have different impacts to the ability to successfully revegetate areas under the different alternatives. Shade discussion should include light amounts under structures.	
7	3.2.1	Permanent Impacts for shade analysis not adequately assessed. We suggest that the analysis look at light intensity levels for different alternatives and what plants might be prevented from growing, particularly in relation to the gradient of habitats that would be a part of Tennessee Hollow and Marsh restoration projects: woodland, willow riparian, freshwater marsh, brackish marsh, and tidal marsh. The vegetation that can be established, as well as the gaps between the vegetation will partially determine the impacts to a restored corridor from Tennessee Hollow to Crissy Marsh.	
8	3.2.1	The impacts to the corridor the causeway were not adequately assessed. In that there was not much differentiation among the alternatives described in the text. The assessment seemed largely based on generalizations for taxa based on professional judgement. Also, the impacts were not assessed using any sort of quantitative measure (such as the height:width ratio) or based on impacts to important plant or animal species that would be the focus of restoration efforts. The impacts should be assessed on the basis of the height and width of the causeway or viaduct structure, the light levels that would be expected below the structure, and the vegetation that could be established below the structure, as well as resultant gaps in	

		<p>vegetation. There is a basis in the scientific literature for the inclusion of all these variables as criteria in determining how great an impediment a raised highway structure is to wildlife movements. The impacts to the corridor need to be properly assessed to assist in weighing differences in the alternatives, and to guide the design of mitigations to reduce impacts to the corridor. The assessment should include impacts to habitat and vegetation under the corridor. Lack of vegetation and/or large gaps in vegetation may prevent some animals from moving under the structure. The analysis should consider a gradient of habitats for the proposed restoration efforts including woodland, willow riparian, freshwater marsh, brackish marsh, and tidal marsh. Two or three key plant species for each habitat type should be selected for impact analysis that could examine plant vigor, density, areal coverage, and gaps in vegetation. In addition, a few key animals that we would expect to be targets of the restored corridor from the marsh to Tennessee Hollow should be considered. Some possibilities would be salt marsh common yellowthroat, yellow warbler, black-crowned night-herons, and belted kingfishers. No Build Alternative: The existing structure would impede some wildlife movements. However, this structure is the highest and least wide of the alternatives. This structure would provide for the most light and establishment of vegetation within the Tennessee Hollow—Crissy Marsh corridor. This alternative would be the best for wildlife passage. Replace and Widen: This structure would be the same height as existing, but would be nearly twice as wide. This structure would have a height to width ratio $\frac{1}{2}$ that of the no build, indicating lower value for wildlife passage. There would be more shade, but the possibility of establishing some shade tolerant species, including trees and shrubs. This structure could still provide passage for wildlife due to the height of the viaduct and vegetation underneath. The greater width of the structure would make it a greater impediment to wildlife movements than the No Build Parkway Alternative: This structure is the lowest and widest, and has the lowest height to width ratio, indicating it could be the worst for wildlife passage. It has been assessed that vegetation would probably not establish under the causeway. As such, this alternative provides the greatest impediment to wildlife movements. We probably would only have wildlife that routinely use culverts passing under this structure. This structure would probably preclude the movements of birds between the marsh and Tennessee Hollow. The Split Parkway design may improve the wildlife corridor underneath the causeway by allowing for more light and some vegetation in the spaces between sections of the causeway, but there still would be concern with the height of the viaducts that should be assessed for designated focal species of plants and animals.</p>
9	3.2.1	<p>The vision for Tennessee Hollow in the GMPA included a pedestrian trail to link Tennessee Hollow with Crissy Marsh. Please demonstrate whether this is feasible in both alternatives. Would the Parkway</p>

10		Alternative allow for human passage under the causeway?		10 Cont
10		This only addresses the light pollution with respect to people. The impact on darkness for wildlife should also be addressed.		11
11	3-39	Paragraph 2 states that "All build alternatives would involve standard construction techniques and require large scale construction of the proposed equipment and labor intensive activities. Yet, construction related noise impacts to Crissy Marsh are dismissed stating that "implementation of the measures specified in the avoidance and minimization measures section of this document will reduce negative noise effects. The effects on the Marsh of standard construction techniques were not evaluated. The document also suggests that "noisy construction activities might be completed using nighttime construction so that day time activities at the Crissy Center would not be disturbed." Since most construction activities listed on page 3-178 create noise levels greater than 5 dBA over the ambient noise levels at Crissy Center, a permit for night construction may be required. If it is not granted, night time construction activities might not be allowed. In that case address the impact of standard construction techniques, "noisy construction activities" on Crissy Center. The impact of standard construction impacts on the Crissy Center has not been fully addressed for the alternatives in Section 3.2.4 Community Impacts. We suggest meeting with Crissy Center Staff to get a better understanding of their transportation access needs during construction and the impacts of standard construction activities on their operations during construction. Unless the EIS makes a definite commitment to full implementation of all of the measures specified in the avoidance and minimization measures section of the document, to include a discussion of retrofitting windows with high sound transmission class (STC) windows, standard construction impacts need to be addressed for all of the alternatives.		12
12	3-47	The evaluation of parking impacts during the construction period does not identify a loss of parking in the Mason Street Warehouse Area. Can Alternative 2 with Detour be constructed without the loss of parking in this area?		13
13	3-47	Impacts on the recreational parking at East Beach that may result from the loss of 619 parking spaces in the Crissy Field-PX/Commissary area, 368 spaces in the Palace of Fine Arts area and other parking losses during construction have not been evaluated. Increased use of East Beach Parking by area A visitors and employees during the construction period could result in reduced visitor satisfaction and the need for additional enforcement of parking restrictions in the area and a requirement for increased manpower to provide this accelerated level of enforcement.		14

14	3-49	<p>The Parking evaluation groups the Crissy Center in the Crissy Field-PX/Commissary area in exhibits 3-9 and 3-10 which indicate that the current requirement for parking in the area is 218 and that only 76 of those spaces will be available during the construction phase of the project. It is not clear in the EIS how close these spaces will be to the Crissy Field Center or how the loss of parking will impact programs at the Center. Please clarify.</p>	15
15	3-51	<p>Alternative 5 straightens the northern section of Halleck Street, shifting it to the east into the 108 space parking lot that was constructed for the Crissy Center. The spaces that remain after construction will be on the same side of Halleck as the center and visitors will not have to cross a busy street to enter the center. As mitigation for the loss of parking by the relocation of Halleck to the east. We recommend expanding the parking lot to the west into the current location of Halleck Street as soon as Halleck Street is reopened in its new alignment.</p>	16
16	3-52	<p>The document now states that it is not known if the removal of buildings 1182, 1183, 1184 and 1185 will be temporary or permanent. Permanent removal of these buildings has never been discussed or agreed to. Removal would only be allowed if it could be assured that they would be returned to their original location in the final phase of construction.</p>	17
17	3-59	<p>The document states here that "Operational as well as construction noise impacts during the construction phase of the proposed project could be minimized by management at the Crissy Center and the construction contractor. Together, they could aid in reducing or eliminating potential noise impacts through careful coordination between noisy construction activities and noise sensitive activities at the Crissy Center." However, page 3-9 Paragraph 2 states that "All build alternatives would involve standard construction techniques and require large scale construction of the proposed equipment and labor intensive activities. The document also suggests that "noisy construction activities might be completed using nighttime construction so that day time activities at the Crissy Center would not be disturbed." Since most construction activities listed on page 3-178 create noise levels greater than 5 dBA over the ambient noise levels at Crissy Center, a permit for night construction may be required. If it is not granted, night time construction activities might not be allowed. The impact of standard construction impacts on the Crissy Center has not been fully addressed in Section 3.2.7 Environmental Justice for Alternatives 2 and 5. The document states on page 3-59 "Operational as well as construction impacts during the construction phase of the proposed project could be minimized by management of the Crissy Field Center and the construction contractor." Address the options that will be available to minimize standard construction noise impacts on the Crissy Center. We suggest meeting with Crissy Center Staff to get a better understanding of the noise</p>	18

		<p>sensitive activities at the Crissy Center, transportation access needs during construction and the impacts of standard construction activities on their operations during construction. Unless the EIS makes a definite commitment to full implementation of all of the measures specified in the avoidance and minimization measures section of the document, to include a discussion of retrofitting windows with high sound transmission class (STC) windows, standard construction impacts need to be addressed for all of the alternatives.</p>	
18	3-88	<p>Alternative 2 states that "additional spillback from westbound Lombard Street would occur unless the Richardson northbound slip ramp to Marshall is maintained. Page 2-43 states "The current Presidio access for northbound traffic at the east end of Doyle Drive can not be accommodated due to geometric constraints and concerns for traffic safety. If the slip ramp can not remain, the impact of the spillback on local streets and intersections should be described in greater detail, to include how far the spillback will back up on Lombard Street and how cut through traffic will impact local streets and intersections.</p>	18 Cont
19	3-99	<p>Alternative 2, No-Detour Option raises the low viaduct structures more than 6 feet and doubles its width. This significant increase in the mass and scale of the roadway significantly increases the visual and physical separation between the upper and lower post that was created along the bluffs between the National Cemetery and Lalleck Street when Doyle Drive was first constructed. The boundary, created by the bluffs, marks a functional separation between the urban functions of the upper post and the industrial functions that occurred in the lower post. Alternative 2's mass and scale covers such a vast expanse along the bluffs that this character defining element of the Presidio will be obscured.</p>	19
20	3-114	<p>Add to Para 4 discussion of Alt 2 No-Detour--The significant increase in the mass and scale of the low viaduct that results from raising its elevation by more than 6 feet and doubling its width significantly increases the visual and physical separation between the upper and lower post that was created along the bluffs between the National Cemetery and Lalleck Street when Doyle Drive was first constructed. The boundary, created by the bluffs, marks a functional separation between the urban functions of the upper post and the industrial functions that occurred in the lower post. Alternative 2 No-Detour covers such a vast expanse along the bluffs that this character defining element of the Presidio will be obscured.</p>	20
21	3-115	<p>Alt 5 Para 1. Please clarify how will this section be modified to include the recommendations of the DEIS review meeting to relocate rather than demolish buildings 204 and 230, to raise the elevation of building 228 and to leave the portion of building 201 that can be saved in place. This discussion should note that building 201 was moved from its original location when Doyle Drive was first constructed. A portion of</p>	21
			22

		building 204 was also removed at some time in the past.	
22	3-119	Relocation. Please clarify how will this section be modified to include the recommendations of the DEIS review meeting to relocate rather than demolish buildings 204 and 230, to raise the elevation of building 228 and to leave the portion of building 201 that can be saved in place. This discussion should note that building 204 was moved from its original location when Doyle Drive was first constructed. A portion of building 204 was also removed at some time in the past.	23
23	3-106	Regulatory Setting Para 2 line 7 change as to an	24
24	3-106	Regulatory Setting Para 4 line 8 change included to include	25
25	3-114	Last Para states Mason Street Warehouses are expected to be replaced to their original location. It should say "will" be put back if removed. This comment was made on the Admin DEIS. If this change is not to be made please provide clarification on this decision. It is not in the current comment matrix showing Authority responses to Admin DEIS comments).	26
26	3-115	Alt 5 Para 2 line 8 add Marshall Street	27
27	3-116	Preparation of Historic Structure Reports. We suggest referencing the standards established in "Preservation Brief 13: The Preparation and Use of Historic Structure Reports," by Deborah Slaton, published by Heritage Preservation Services, National Park Service, 2005.	28
28	3-117	Archaeology Monitoring, Discovery, Evaluation and Treatment Plan. Please include a discussion of any plans to conduct further consultation with Ojibwe tribes and individuals as planning and design proceed.	29
29	3-118	The last sentence of the 1 st Para "Efforts to comply with NAGPRA will also be included as will also be described." Is confusing.	30
30	3-125	Para 4 line 6. Change "involved in" to "planning for" -- the public process hasn't started yet.	31
31	3-137	Text refers to an Exhibit showing contaminated sites, but the Exhibit is not in the document	32
32		2nd bullet under Flood Protection from Extreme Tidal Events – The below ground parking north of the Gorgas warehouse mentioned here is not fully characterized and evaluated throughout the document. It would be useful to see this evaluation and determination. If the potential impacts to hydrology and groundwater resources associated with the proposed single-level underground parking structure at the Gorgas Warehouses were evaluated and determined to be less than significant, the analysis should be presented in the EIS/R.	33
33		Maintenance of Hydrologic Conditions at the Main Post Tunnel – It would be helpful to include a cross	34

		section of this tunnel. It is not clear from the illustrations that there are no scoops or springs that could be affected by this structure. There is no new cross section of the fill on the face of the low bluff.	
34		Exhibit 3-35 The proposed tunnel should be shown as a cut-and-cover tunnel.	
45		1st partial paragraph, last two sentences – these statements contradict one another. Clarify why the groundwater table would rise. Note that the topography will be changed dramatically here by the placement of fill. This needs an illustration. The discussion of groundwater in fill is confusing.	
36	3-137	Managing Water Quality from Construction Dewatering – 2nd paragraph – include discussion of the remediation sites in the project area.	
37	3-140	Hydrology, Water Quality and Storm water -- Regulatory Setting – add brief discussion of relevant NPS policies (similar to that for Air Quality.) NPS Policies 2001, Section 4.6, Water Resources management should be referenced here.	
38	3-146	New Exhibit 3-43 shows "soil" and "bedrock" which is a common way to differentiate for the purposes of case of excavation; it should be clarified that much of the "soil" included here appears to be Colma. The differences between the volumes on Exhibit 2-31 and 3-43 should be clarified.	
39	3-178-179	Noise Impacts to Crissy Field Center The EIS/R states "To minimize construction noise impacts during the construction phase of the project, management of the Crissy Field Center and the construction contractor can aid in reducing or eliminating potential noise impacts by careful coordination between noisy construction activities and noise sensitive Center Activities. An example might be that the noisy construction activities might be completed using nighttime construction so that day time activities at the Center would not be disturbed." Since most construction activities listed on page 3-178 create noise levels greater than 5 dBA over the ambient noise levels at Crissy Center, a permit for night construction may be required. If it is not granted, night time construction activities might not be allowed. In that case what is the impact of daytime "noisy construction activities" on the noise sensitive educational programs at Crissy Center? Alt. 2 Detour constructs, operates and demolishes a detour structure approximately 15 feet from the back of the Crissy Center. The impact of these activities appears to be different from the noise impacts associated with Alt 2 No-Detour and Alt 5, yet, the document states that the temporary impacts for the three alternatives are generally the same and they are discussed as one impact. The discussion of retrofitting windows with windows with a high sound transmission class (STC) did not include the Crissy Center.	
40	3-148	The discussion should emphasize that Alternative 5 takes out 5 times more material (Exhibit 2-31) or 15 times more native soil and rock (Exhibit 3-13).	

41	3-178	<p>Noise Impacts to Crissy Field Marsh Page 3-39 Paragraph 2 states that "All build alternatives would involve standard construction techniques and require large scale construction of the proposed equipment and labor intensive activities. However, Section 3.3.5 page 3-178 states that implementing the measures specified in the avoidance and minimization measures section of this document will reduce negative noise effects on Crissy Field Marsh. However in the Measures to Minimize Construction Noise, Page 3-196, EIS/R does not commit to any of these measures except to say that to the "extent feasible, the contractor will ensure that these measures are taken." Unless the document can make an official commitment to implement the measures to minimize construction noise, the impact of standard construction practices referenced on page 3-39 on Crissy Marsh and the Crissy Field Center must be included in the EIS /R. These standard construction technique noise impacts should be evaluated for both day time and night time construction activities.</p>	42
42	3-179 through 3-181	<p>The information presented for each plant community type is unbalanced in terms of the amount of information provided for each plant community.</p>	43
43	3-195	<p>The Crissy Center should be included in the discussion of noise insulation and retrofitting windows.</p>	44
44	3-196	<p>Measures to Minimize Construction Noise This section of the EIS/R does not commit to any of these measures except to say that to the "extent feasible, the contractor will ensure that these measures are taken " The noise levels generated by the measures proposed in this section should be provided and compared with the noise levels presented in Exhibit 3-52.</p>	45
45	3-205	<p>Energy – Include energy consumption estimates for construction for each of the alternatives.</p>	46
46	3-215	<p>Non-native Introduced Forest paragraph – clarify that the pine, cypress, and eucalyptus, where they occur within the Historic Forest Management Zone, are designated as a cultural resource in the Presidio VMP, but where they occur within the Native Plant Zone of the PVMP, they are considered invasive non-native species.</p>	47
47	3-215	<p>In addition to the direct impacts to skunkweed and gumplant that have been called out, other species with unique value and potential habitat for various plant species will be lost as a result of the loss of varying amounts of natural community types under each alternative. For example, the following special status species will lose potential habitat within the construction corridor: Franciscan thistle (Cirsium andrewsii), Presidio manzanita (Arctostaphylos hookeri ssp. ravenii), Presidio clarkia (Clarkia franciscana), and Main</p>	48

48			dwarf flax (<i>Hesperolinon congestum</i>). In addition, significant propagule collection sites for red and blue elderberry will be impacted under all build alternatives.	48 Cont
49	3-217		Northern Foredunes Community Description should include statement indicating that The Crissy Field dune community is identified as a Special Ecological Area (SEA) by NPS. Also supports many special status plants. This information should be included here	49
50	3-217		Why are the northern foredune, central dune scrub and freshwater wetland communities at Crissy Field lumped under the description for the "restored marsh and associated wetlands". This is inconsistent with how other community types are presented. All of these communities should be described individually; each supports special status plant species. The freshwater wetland (dune swale) east of Crissy marsh is an area of very high plant diversity, and provides nesting habitat for red-winged blackbirds. This area should be identified.	50
51	3-218		Text should be added to refer the reader to a standard source book on BMPs, e.g., Caltrans Storm Water Quality Handbooks Construction Site Best Management Practices Manual (2003).	51
52	3-218		Under "Non-native vegetation"; add text to indicate other types of measures that may be implemented to reduce erosion and weed establishment. Contractor should work with Presidio natural resources staff to ensure adequacy of weed control methods.	52
53	3-225		Wetlands and other Waters... National Park Service and Presidio Trust Plans and Policies – This paragraph belongs in Section 3.4.1 or 3.4.3. Replace it here with NPS/PT wetland policy statement. Move paragraph from p. 3-225 to p. 3-210, and add NPS Wetland policy statement	53
54	3-229		Exhibit 3-68 – The Tennessee Hollow Corridor should be represented as it is on other illustrations. Add Crissy Marsh Expansion Study Area boundary.	54
55	3-229		Exhibit 3-68 incorrectly depicts the USACE jurisdictional wetland at Dragonfly Creek as larger than the Cowardin wetland. As a rule, the Cowardin wetland polygons should always be as large as or larger than the USACE jurisdictional wetlands.	55
56	3-229		Exhibit 3-68 may cause confusion between the USACE and Cowardin wetlands. All wetlands that are depicted as USACE wetlands should also be depicted as Cowardin wetlands. For example, wetland W-2 is shown as blue, when it should be classified as both a USACE and Cowardin wetland; in this case the polygons are identical.	56
57	3-231/2		The discussion of impacts to wetlands is limited to wetlands within the construction corridor. Need	57

		discussion of impacts to wetlands in project study area.	
57	3-235	Biological Resource Monitoring Program referenced here, as described in previous section was a construction monitoring program and would not be adequate to assess efficacy of mitigation measures.	
58	3-238	Add VMP to list of NPS and Trust Plans and Policies at top of page.	
59	3-239	2nd paragraph under "Special Status Species": Change to Crissy Field Marsh and Dunes.	
60	3-246	3rd paragraph. any seed mixtures or hydro seed used must first be approved by NPS and Trust NR	
61	3-253	Snowy plovers have shifted from "rare" to "regular" visitors in the Presidio.	
62	3-254	See comment on wildlife corridor under 3.2.1. In addition, the wildlife corridor over the tunnel to the west of the causeway is not the same in terms of habitat value. There probably would be different species using the corridors between Tennessee Hollow and Crissy Marsh and the habitat over the tunnel. The habitat over the tunnel does not adequately mitigate for the loss of habitat connectivity under the causeway in the Parkway alternative.	
63	General	Total number of wetland acreage listed in text does not agree with that shown in Exhibit 3-63. Please check for consistency throughout.	
64		5th paragraph, 1st sentence: Modify to read, "most of the ... wetlands, with the exception of the restored wetlands at Crissy Field..."	
65		Hydrology, Water Quality, Storm Runoff, and Wetlands- Presidio Parkway Impacts (permanent, temporary, and cumulative) – modify all 6 statements to read "Significant, less than significant with successful mitigation."	
66	4-6	Add Marshall Street to the first sentence at the top of the page	
67	4-10	Para 2 line 5 delete "and vary little between alternatives"	
68	5-11	The discussion of cumulative impacts on hydrology should be more comprehensive.	
69	5-16	Add Marshall Street to line 5 of Para 2.	
70	C-1	The discussion of Replace and Widen No-Detour Option in the last paragraph does not address the visual	

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		impact of raising the low viaduct by 6 feet and doubling its width. This impact is not shown clearly in the visual simulations nor is it described adequately in the document.	
71	C-2	Para 1 Lighting. The reduction of fugitive light from cars and light fixtures on the roadway in areas where the Parkway is in tunnel has not been identified as a positive aspect of the Parkway Alternative. This type of fugitive light as well as noise from the roadway will be greatly reduced if not eliminated in portions of the Parkway that are in tunnel.	
72	C-10	Add to Para 4 discussion of Alt 2 No-Detour--The significant increase in the mass and scale of the low viaduct that results from raising its elevation by more than 6 feet and doubling its width significantly increases the visual and physical separation between the upper and lower post that was created along the bluffs between the National Cemetery and Halleck Street when Doyle Drive was first constructed. The boundary, created by the bluffs, marks a functional separation between the urban functions of the upper post and the industrial functions that occurred in the lower post. Alternative 2 No-Detour covers such a vast expanse along the bluffs that this character defining element of the Presidio will be obscured.	
73	5-20	Under Historic Resources, the No Detour Option, and the two Parkway options should also be described as Potential Adverse Effects. That's what the narrative on the preceding pages says.	
74	7-48	Interpretive/Educational Materials and Popular Report Interpretive signage and interpretive material will be needed during construction to explain the Doyle Drive construction project to National Park visitors. Signage and interpretive material will also be needed to show how elements of the cultural landscape and contributing structures have been moved, demolished or altered.	



Comments on the Doyle Drive Project DEIS/R

Reviewer: GGNRA

Reviewer's Comment Number	Response	Database ID
1	Support for the Hook Ramp Option and Diamond Drive Option noted. In July 2006, Alternative 5 with the Diamond interchange option was selected as the Preferred Alternative therefore Building 1151 (YMCA Pool) will remain intact.	1742
2	The width of the parkway was included in the FEIS/R, see discussion under 2.4.3 for the Presidio Parkway Alternative and 2.5.1 for the Preferred Alternative.	1743
3	The Circle Drive option would require the permanent removal of 10 buildings.	1744
4	The natural topography (1875 topography) has already been altered in this area as described in the discussion of Topography and Natural Features in Section 3.3.2.	1745
5	<p>The discussion under Wildlife Corridor in Section 3.4.4 of the FEIS/R noted this impact: "Passage under raised structures and causeways would be difficult for some bird species." The EIS/R does provide an analysis of shade, using best available information (see the Plans and Policies Section under the PTMP discussion of Section 3.2.1) and is available as part of the Community Impact Assessment technical document. Developing a mitigation program for shade effect is part of the "Mitigation Prospectus" also included in Appendix K. Mitigations will be formalized as part of the Record of Decision and associated Mitigation Monitoring and Reporting Plan. A binding Memorandum of Agreement or Understanding between the lead agency and the NPS and Trust will be prepared to ensure the implementation of the wetland mitigation measures.</p> <p>The Summary section of the FEIS/R highlights the project commitments including working with the GGNRA and Trust to find the most feasible solution for accommodating the Quarter Master Reach during final design. The text clearly states that the commitments are binding. It also includes a reference to Appendix K for more details on potential mitigation.</p>	1746
6	These activities will occur as part of the pre-design phase of the project.	1747
7	<p>The EIS/R does provide an analysis of shade (in the Plans and Policies section under the PTMP discussion of Section 3.2.1) using best available information and is available as part of the Community Impact Assessment technical document. Developing a mitigation program for shade effect is part of the "Mitigation Prospectus," also included in Appendix K. Mitigation measures will be formalized as part of the Record of Decision and associated Mitigation Monitoring and Reporting Plan. A binding Memorandum of Agreement or Understanding between the lead agency and the NPS and Trust will be prepared to ensure the implementation of the wetland mitigation measures.</p> <p>The Summary section of the FEIS/R highlights the project commitments including working with the GGNRA and Trust to find the most feasible solution for accommodating the Quarter Master Reach during final design. The text was revised to clearly state that the commitments are binding. It also includes a reference to Appendix K for more details on potential mitigation.</p>	1748



Comments on the Doyle Drive Project DEIS/R

Reviewer: GGNRA

Reviewer's Comment Number	Response	Database ID
8	<p>The EIS/R does provide an analysis of shade (in the Plans and Policies section under the PTMP discussion of Section 3.2.1) using best available information and is available as part of the Community Impact Assessment technical document. Developing a mitigation program for shade effect is part of the "Mitigation Prospectus," also included in Appendix K. Mitigation measures will be formalized as part of the Record of Decision and associated Mitigation Monitoring and Reporting Plan. A binding Memorandum of Agreement or Understanding between the lead agency and the NPS and Trust will be prepared to ensure the implementation of the wetland mitigation measures.</p> <p>The Summary section of the FEIS/R highlights the project commitments including working with the GGNRA and Trust to find the most feasible solution for accomodating the Quarter Master Reach during final design. The text was revised to clearly state that the commitments are binding. It also includes a reference to Appendix K for more details on potential mitigation.</p>	1749
9	<p>The discussion of the Tennessee Hollow riparian corridor connection to Crissy Marsh in Section 3.2.1 was enhanced with more detailed discussion of each alternative alignment in the area and includes graphics depicting the area of restoration which will be available under each alternative. Information regarding the shade issue is included in the Plans and Policies section under the PTMP discussion of Section 3.2.1 of the FEIS/R. Conclusions are correctly interpreted but somewhat qualitative. Further detail of the shade analysis is available in Appendix B of the Final Community Impact Assessment (August 2006) which is included on CD with DEIS/R, additional copies available on request. The EIS cannot effectively model or predict complex suites of plant and animal responses to the project, except to conclude that, overall, this is not significant in the context of the existing environment.</p> <p>The Summary section of the FEIS/R highlights the project commitments including working with the NPS and Trust to find the most feasible solution for accomodating the Tennessee Hollow restoration during final design. The text was revised to clearly state that the commitments are binding. It also includes a reference to Appendix K for more details on potential mitigation.</p>	1750
10	<p>The discussion of the Tennessee Hollow riparian corridor connection to Crissy Marsh in Section 3.2.1 has been enhanced with more detailed discussion of each alternative alignment in the area and includes graphics depicting the area of restoration which will be available under each alternative.</p> <p>The Summary section of the FEIS/R highlights the project commitments including working with the NPS and Trust to find the most feasible solution for accomodating the Tennessee Hollow restoration during final design. The text has been revised to clearly state that the commitments are binding. It also includes a reference to Appendix K for more details on potential mitigation.</p>	1751



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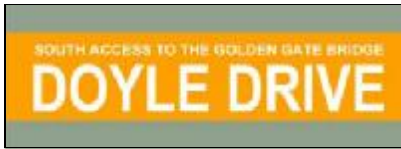
Reviewer's Comment Number	Response	Database ID
11	<p>The topic of impact of night lighting is discussed in Section 3.4.4: "Night construction would require lighting, which adds another type of impact beyond the effects of noise discussed above/elsewhere in this FEIS. There are current sources of night lighting in the project area and to some degree it is part of the existing environment. However, construction lighting is expected to be considerably brighter. This raises the possibility of light as an attractant, especially for migratory birds, a phenomenon observed by Reed et al. (1985). This would be an adverse impact but one for which an assessment of degree would be difficult to determine. The same study found that shielding lights to prevent upward radiation decreased attraction by nearly 40 percent. The NPS/Trust have made a determination that the effects may be potentially considerable; therefore the reduction of upward radiation by the best available and feasible means (for example, downward-pointing lights, side shields and visors) as agreed upon by the NPS and Trust will be used at Doyle Drive, and would be considered part of the project. In order to insure the use of best available current data, a Lighting Plan will be developed as part of final design to mitigate fugitive light to the maximum extent practicable. Other methods of impact reduction (large screens, for example) would have their own impact on night flying birds and bats and would not be used."</p>	1752
12	<p>During final design, construction noise abatement details will be developed and included as part of the construction contract documents. The contract documents will contain the appropriate controls to meet the all applicable state and local requirements. This would include noise specifications for the operation and maintenance of equipment, noise screening and/or use of noise-reducing features on equipment and vehicles, haul routes and noise monitoring.</p> <p>Although construction noise impacts to the human environment at Crissy Field Marsh are not anticipated, construction noise monitoring will be included as part of the Construction Noise Plan. While Crissy Field Marsh is located at a substantial distance from the construction site and is not expected to be adversely affected by construction noise, the construction noise monitoring will provide reasonable assurance that noise impacts to Crissy Field Marsh will be minimized. Since nearly all of the usage of Crissy Field Marsh is influenced by the existing traffic noise from Mason Street and the environmental sounds dominated by the winds off of the Bay, the potential of adverse impacts on the human environment are minimal. The FEIS/R identifies noise (as well as vibration) impact minimization efforts that are practical for the Preferred Alternative (noted in the Avoidance, Minimization and/or Mitigation Measures of Section 3.3.5). After considerable efforts to identify a method to minimize or eliminate the potential impacts at the Crissy Center from the TCD, it has been determined that practical methods to accomplish this is very limited. Therefore, based on the concerns expressed by the owners of the Crissy Center, it has been determined that the functions of the Crissy Center will be temporarily relocated during the construction phase to a more suitable location.</p>	1753
13	<p>Alternative 5, the Presidio Parkway Alternative, was identified as the Preferred Alternative (see Section 2.5). Replacement parking at the Parade Grounds has been proposed to address any project-related impacts during construction. Details pertaining to the proposed replacement parking would be developed in the Plans, Specifications, and Estimates (PS&E) phase of the project.</p>	1754



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Reviewer: GGNRA

Reviewer's Comment Number	Response	Database ID
14	The proposed replacement parking at the Parade Grounds augmented with the existing shuttle service should address the identified parking impacts during construction. Details pertaining to the proposed replacement parking would be developed in the Plans, Specifications, and Estimates (PS&E) phase of the project. Parking will be coordinated with the Presidio Trust. The concern of a change in parking conditions in the East Beach area during construction is legitimate. Parking will continue to be monitored especially during the construction period, and mitigations may be modified accordingly to address impacts.	1755
15	Based on the Addendum to the September 2004 Final Parking Impact Analysis Technical Report which was prepared following the selection of the Preferred Alternative and using the revised building use assumptions and parking supply conditions, it was determined that sufficient parking supply would be provided to meet the demand within the PX/Commissary Area (where the Crissy Field Center is located) during construction. Although some existing parking would be eliminated during the construction period, enough replacement parking would be provided near the Crissy Center near the site of Building 605 following its removal.	1756
16	Based on the Addendum to the September 2004 Final Parking Impact Analysis Technical Report which was prepared following the selection of the Preferred Alternative and using the revised building use assumptions and parking supply conditions, it was determined that sufficient parking supply would be provided to meet the demand within the PX/Commissary Area (where the Crissy Field Center is located) during construction. Although some existing parking would be eliminated during the construction period, enough replacement parking would be provided near the Crissy Center near the site of Building 605 following its removal.	1757
17	In July 2006, Alternative 5 with the Diamond interchange option was selected as the Preferred Alternative therefore Buildings 1182, 1183, 1184 and 1185 will remain intact.	1758
18	<p>During final design, construction noise abatement details will be developed and become part of the construction contract documents. The contract documents will contain the appropriate controls to meet the all applicable state and local requirements. This would include noise specifications for the operation and maintenance of equipment, noise screening and/or use of noise-reducing features on equipment and vehicles, haul routes and noise monitoring.</p> <p>Although construction noise impacts to the human environment at Crissy Field Marsh are not anticipated, construction noise monitoring will be included as part of the Construction Noise Plan. While Crissy Field Marsh is located at a substantial distance from the construction site and is not expected to be adversely affected by construction noise, the construction noise monitoring will provide reasonable assurance that noise impacts to Crissy Field Marsh will be minimized. Since nearly all of the usage of Crissy Field Marsh is influenced by the existing traffic noise from Mason Street and the environmental sounds dominated by the winds off of the Bay, the potential of adverse impacts on the human environment are minimal. The FEIS/R identifies noise (as well as vibration) impact minimization efforts that are practical for the Preferred Alternative (noted in the Avoidance, Minimization and/or Mitigation Measures of Section 3.3.5). After considerable efforts to identify a method to minimize or eliminate the potential impacts at the Crissy Center from the TCD, it has been determined that practical methods to accomplish this is very limited. Therefore, based on the concerns expressed by the owners of the Crissy Center, it has been determined that the functions of the Crissy Center will be temporarily relocated during the construction phase to a more suitable location.</p>	1759



Comments on the Doyle Drive Project DEIS/R

Reviewer: GGNRA

Reviewer's Comment Number	Response	Database ID
19	Alternative 2 and the Slip Ramp were not carried through as the locally preferred alternative.	1760
20	The text under the discussion of Permanent Impacts to Alternative 2-Replace and Widen of Section 3.2.10 has been revised to include the points raised in the comment. The visual effects cited in the comment are consistent with the findings in the EIS and Visual Impact Assessment and provide additional examples of why Alternative 2- No Detour Option was found to result in an adverse impact to viewpoints at the Main Post.	1761
21	The analysis for Alternative 2 adequately reflects the impact of the project on the Presidio NHL.	1762
22	The analysis now reflects the Presidio Trust's decision to demolish Buildings 204 and 230, retain the upper story of Building 201, and leave Building 228 at its current elevation.	1763
23	This comment was addressed as part of the development of the Programmatic Agreement and treatment plans and a summary is provided in the Avoidance, Minimization and/or Mitigation Measures of Section 3.2.11 of the FEIS/R.	1764
24	Text has been revised as suggested	1765
25	Text has been revised as suggested	1766
26	Putting the buildings back as mitigation is not part of the project description. In July 2006, Alternative 5 with the Diamond interchange option was selected as the Preferred Alternative therefore the Mason Street Warehouses will not be removed and will remain intact.	1767
27	Text has been revised as suggested	1768
28	This reference was included in the discussion under Preparation of Historic Structures Reports in Avoidance, Minimization and/or Mitigation Measures of Section 3.2.11 of the FEIS/R.	1769
29	Text regarding the consultation with the Ohlone tribe was included in the discussion under Archaeology Monitoring, Discovery, Evaluation and Treatment Plan in Avoidance, Minimization and/or Mitigation Measures of Section 3.2.11 of the FEIS/R.	1770
30	Text regarding the NAGPRA under Archaeology Monitoring, Discovery, Evaluation and Treatment Plan in Avoidance, Minimization and/or Mitigation Measures of Section 3.2.11 of the FEIS/R has been revised.	1771



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Reviewer's Comment Number	Response	Database ID
31	The text under Existing Watershed Basins and Drainages in Section 3.3.1 has been modified as requested. The text has been changed to read as follows: "The Trust, National Park Service, and the Golden Gate National Parks Conservancy are currently planning for a public planning/NEPA process for the Crissy Marsh expansion project...."	1772
32	The exhibit showing hazardous material sites within the study area is included as Exhibit 3-54 in Section 3.3.3 of the FEIS/R.	1773
33	The underground parking option referred to by the comment is no longer a component of the project.	1774
34	A cross section of this tunnel is included in the Hydrology and Water Resources Technical Report (which is incorporated into the DEIS/R by reference). No wetlands were identified in the vicinity of the Main Post Tunnel fill area, and therefore no important springs on the bluff are known to be present. The lack of springs and wetlands in this area was confirmed by consultation with the biology team.	1775
35	It appears that the commenter is referring to Exhibit 3-49 in Section 3.3.1, which shows the tunnel through the bluff area. This figure has been modified to show that geologic material over the completed tunnel would be backfill, not native formation.	1776
36	The text under Alteration of Surface and Near Surface Hydrology at the Main Post Tunnel in Section 3.3.1 has been changed to clarify the description of groundwater conditions. A cross-section of the tunnel through this area is also included, see Exhibit 3-49.	1777
37	The text under Groundwater of Section 3.3.1 has been modified to include the following statement: "Discussion of hazardous materials and remediation sites is provided in Section 3.3.3 Hazardous Waste/Materials of this document."	1778
38	The text under Regulatory Setting of Section 3.3.1 has been modified to include the following discussion of policies: National Park Service and Presidio Trust Water Resources Policies - The National Park Service (NPS) and the Presidio Trust provide additional emphasis on water resources. While there are no existing national or state water standards that are specific to the Presidio or national parks, the following lists the titles of existing NPS policies set forth in its Director's Orders and Executive Orders which provide general policy direction in promoting floodplain and wetlands management: Executive Order No. 11988 - Floodplain Management, Executive Order 11990 - Protection of Wetlands.	1779
39	Note was added to clarify that much of the soil will be the Colma Formation. The difference between the volumes will be clarified. Exhibit 2-37 in Section 2.6 includes all soil/rock removed and fill placed; Exhibit 3-53 in Section 3.3.2 only includes native soil/rock.	1780



Comments on the Doyle Drive Project DEIS/R

Reviewer: GGNRA

Reviewer's Comment Number	Response	Database ID
40	<p>During final design, construction noise abatement details will be developed and become part of the construction contract documents. The contract documents will contain the appropriate controls to meet the all applicable state and local requirements. This would include noise specifications for the operation and maintenance of equipment, noise screening and/or use of noise-reducing features on equipment and vehicles, haul routes and noise monitoring.</p> <p>Although construction noise impacts to the human environment at Crissy Field Marsh are not anticipated, construction noise monitoring will be included as part of the Construction Noise Plan. While Crissy Field Marsh is located at a substantial distance from the construction site and is not expected to be adversely affected by construction noise, the construction noise monitoring will provide reasonable assurance that noise impacts to Crissy Field Marsh will be minimized. Since nearly all of the usage of Crissy Field Marsh is influenced by the existing traffic noise from Mason Street and the environmental sounds dominated by the winds off of the Bay, the potential of adverse impacts on the human environment are minimal. The FEIS/R identifies noise (as well as vibration) impact minimization efforts that are practical for the Preferred Alternative (noted in the Avoidance, Minimization and/or Mitigation Measures of Section 3.3.5). After considerable efforts to identify a method to minimize or eliminate the potential impacts at the Crissy Center from the TCD, it has been determined that practical methods to accomplish this is very limited. Therefore, based on the concerns expressed by the owners of the Crissy Center, it has been determined that the functions of the Crissy Center will be temporarily relocated during the construction phase to a more suitable location.</p>	1781
41	<p>Exhibit 2-37 in Section 2.6 has been revised to include the volume of soil/rock excavated and then placed as fill. The analysis is based on a comparison of build alternatives to the existing condition and hence presented in total volumes.</p>	1782
42	<p>During final design, construction noise abatement details will be developed and become part of the construction contract documents. The contract documents will contain the appropriate controls to meet the all applicable state and local requirements. This would include noise specifications for the operation and maintenance of equipment, noise screening and/or use of noise-reducing features on equipment and vehicles, haul routes and noise monitoring.</p> <p>Although construction noise impacts to the human environment at Crissy Field Marsh are not anticipated, construction noise monitoring will be included as part of the Construction Noise Plan. While Crissy Field Marsh is located at a substantial distance from the construction site and is not expected to be adversely affected by construction noise, the construction noise monitoring will provide reasonable assurance that noise impacts to Crissy Field Marsh will be minimized. Since nearly all of the usage of Crissy Field Marsh is influenced by the existing traffic noise from Mason Street and the environmental sounds dominated by the winds off of the Bay, the potential of adverse impacts on the human environment are minimal. The FEIS/R identifies noise (as well as vibration) impact minimization efforts that are practical for the Preferred Alternative (noted in the Avoidance, Minimization and/or Mitigation Measures of Section 3.3.5). After considerable efforts to identify a method to minimize or eliminate the potential impacts at the Crissy Center from the TCD, it has been determined that practical methods to accomplish this is very limited. Therefore, based on the concerns expressed by the owners of the Crissy Center, it has been determined that the functions of the Crissy Center will be temporarily relocated during the construction phase to a more suitable location.</p>	1783
43	<p>The plant community discussions are appropriately proportional, since communities simpler in structure merit less description.</p>	1784



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Reviewer: GGNRA

Reviewer's Comment Number	Response	Database ID
44	<p>During final design, construction noise abatement details will be developed and become part of the construction contract documents. The contract documents will contain the appropriate controls to meet the all applicable state and local requirements. This would include noise specifications for the operation and maintenance of equipment, noise screening and/or use of noise-reducing features on equipment and vehicles, haul routes and noise monitoring.</p> <p>Although construction noise impacts to the human environment at Crissy Field Marsh are not anticipated, construction noise monitoring will be included as part of the Construction Noise Plan. While Crissy Field Marsh is located at a substantial distance from the construction site and is not expected to be adversely affected by construction noise, the construction noise monitoring will provide reasonable assurance that noise impacts to Crissy Field Marsh will be minimized. Since nearly all of the usage of Crissy Field Marsh is influenced by the existing traffic noise from Mason Street and the environmental sounds dominated by the winds off of the Bay, the potential of adverse impacts on the human environment are minimal. The FEIS/R identifies noise (as well as vibration) impact minimization efforts that are practical for the Preferred Alternative (noted in the Avoidance, Minimization and/or Mitigation Measures of Section 3.3.5). After considerable efforts to identify a method to minimize or eliminate the potential impacts at the Crissy Center from the TCD, it has been determined that practical methods to accomplish this is very limited. Therefore, based on the concerns expressed by the owners of the Crissy Center, it has been determined that the functions of the Crissy Center will be temporarily relocated during the construction phase to a more suitable location.</p>	1785
45	<p>During final design, construction noise abatement details will be developed and become part of the construction contract documents. The contract documents will contain the appropriate controls to meet the all applicable state and local requirements. This would include noise specifications for the operation and maintenance of equipment, noise screening and/or use of noise-reducing features on equipment and vehicles, haul routes and noise monitoring.</p> <p>Although construction noise impacts to the human environment at Crissy Field Marsh are not anticipated, construction noise monitoring will be included as part of the Construction Noise Plan. While Crissy Field Marsh is located at a substantial distance from the construction site and is not expected to be adversely affected by construction noise, the construction noise monitoring will provide reasonable assurance that noise impacts to Crissy Field Marsh will be minimized. Since nearly all of the usage of Crissy Field Marsh is influenced by the existing traffic noise from Mason Street and the environmental sounds dominated by the winds off of the Bay, the potential of adverse impacts on the human environment are minimal. The FEIS/R identifies noise (as well as vibration) impact minimization efforts that are practical for the Preferred Alternative (noted in the Avoidance, Minimization and/or Mitigation Measures of Section 3.3.5). After considerable efforts to identify a method to minimize or eliminate the potential impacts at the Crissy Center from the TCD, it has been determined that practical methods to accomplish this is very limited. Therefore, based on the concerns expressed by the owners of the Crissy Center, it has been determined that the functions of the Crissy Center will be temporarily relocated during the construction phase to a more suitable location.</p>	1786
46	<p>Energy consumption estimates are in Section 3.3.6 and in Exhibit 3-77.</p>	1787



Comments on the Doyle Drive Project DEIS/R

Reviewer: GGNRA

Reviewer's Comment Number	Response	Database ID
47	Text has been revised under the discussion of Non-native Introduced Forest and Ornamental Wildlife Habitat in Section 3.4.1: "Where these species occur within the Historic Forest Management Zone, they are designated as a cultural resource in the NPS's Vegetation Management Plan."	1788
48	The FEIS/R discusses all of these species beginning under the discussion of Federal or State Listed or Potentially Listed Plants in Section 3.4.3. Explicitly: "None of the five federal or state listed plants are present in the construction corridor. The serpentine soil located in the northwestern portion of the project study area does not support Presidio manzanita, Presidio clarkia or Marin dwarf flax." Minimization of indirect effects to sensitive plants is discussed in the Avoidance, Minimization and/or Mitigation Measures of Section 3.4.3. The NEPA/CEQA process does not normally deal with habitat not occupied by a species of concern ("potential habitat"), except where impacts on native plant habitats are discussed more generally (as vegetation communities). See Section 3.4.1.	1789
49	Text under Northern Foreddune in the Affect Environment of Section 3.4.1 was changed in response to this comment to include mention of the SEA.	1790
50	In the interest of a more concise document, the EIS/R only provides this level of detail only for communities subject to impact.	1791
51	There is now an added reference to revised chapter: Department of Transportation, State of California. 2003. Storm Water Quality Handbooks, Project Planning and Design Guide Construction Site Best Management Practices (BMPs) Manual.	1792
52	There is now an added reference to: Department of Transportation, State of California. 2003. Storm Water Quality Handbooks. Project Planning and Design Guide Construction Site Best Management Practices (BMPs) Manual. See the introduction of Section 3.4.	1793
53	National Park Service and Presidio Trust Plans and Policies information has been moved to the Regulatory Setting of Section 3.4.3.	1794
54	Exhibit 3-82 in Section 3.4.2 of the FEIS/R displays water associated features. In Tennessee Hollow, these are underground (at present) and this is what the dashed blue lines are intended to convey. While the EIS/R should incorporate information from any approved restoration plans provided by the NPS, Exhibit 3-82 is not intended to show future wetlands.	1795
55	There are some minor inconsistencies in the Exhibit 3-82, a result of different data sets being incorporated at different times. A footnote has been added under the Affected Environment discussion in Section 3.4.2: "As a mapping convention, polygons on Exhibit 3-82 are marked differently for Cowardin wetlands and Corps jurisdictional waters. However, the Cowardin system includes all Corps waters as well."	1796
56	There are some minor inconsistencies in the Exhibit 3-82, a result of different data sets being incorporated at different times. A footnote has been added under the Affected Environment discussion in Section 3.4.2: "As a mapping convention, polygons on Exhibit 3-82 are marked differently for Cowardin wetlands and Corps jurisdictional waters. However, the Cowardin system includes all Corps waters as well."	1797



Comments on the Doyle Drive Project DEIS/R

Reviewer: GGNRA

Reviewer's Comment Number	Response	Database ID
57	There are no impacts to wetlands outside the construction corridor. The study area is a larger zone which allows the NEPA/CEQA analyst to consider indirect impacts.	1798
58	Comment noted. The basic purpose of monitoring is to ensure that mitigation measures are followed. In the construction phase, it will be staffed with professionally qualified biologists, and the program has the authority to stop or modify construction as necessary if impacts are occurring which were not analyzed in the DEIS/EIR. The commenter may be referring to post project "restoration" - type mitigation. As stated in the Avoidance, Minimization and/or Mitigation Measures of Section 3.4.2 : "Monitoring will occur during post-construction. Wetland mitigation monitoring will begin after the plants are installed on the site, and continue for a period of five years or until the plantings demonstrate successful establishment and the performance criteria have been met."	1799
59	The Vegetation Management Plan was listed at under the Regulatory Setting at the beginning of Section 3.4.1 as well as Section 3.4.3 of the FEIS/R.	1800
60	The text under Special-Status Species in the Affected Environment of Section 3.4.3 was revised as suggested.	1801
61	Text under Revegetation of Temporarily Disturbed Areas in the Avoidance, Minimization and/or Mitigation Measures of Section 3.4.3 of the FEIS/R states that all revegetation is carried out with NPS and Trust oversight.	1802
62	The text was modified as suggested.	1803



Comments on the Doyle Drive Project DEIS/R

Reviewer: GGNRA

Reviewer's Comment Number	Response	Database ID
63	<p>The EIS/R is limited by the analytical framework of NEPA and CEQA documents. The intent is to identify and mitigate potentially significant impacts and to make a full and public disclosure of these topics. The Doyle Drive project, under these procedures, would not normally be required undertake actions which redress the effects of less-than-significant impacts, or to develop elaborate and speculative discussions of what these effects might conceivably be. Any topic of natural history study is complex, expensive and time-consuming and the outcomes not necessarily definitive, nor are there mitigations which can reliably meet performance expectations when working beyond the limits of best available data and professional judgment. Many comments, beginning with this one dealing with invasive species, are of a similar type, and appear to recommend that the project take responsibility for many long-term land management issues that, while worthy, are beyond what such a project would normally do. However, the lead agency recognizes that the environment of the Presidio has special natural values that transcend the "normal." Therefore, as part of this process, a separate document has been prepared that expands the Project commitments outside the NEPA/CEQA process. This "Doyle Drive Project Wetland and Wildlife Corridor Mitigation Prospectus" is presented as an attachment in Appendix K of the FEIS/R. The FEIS/R concludes that given the existing conditions -- the impediments to wildlife movement already encountered by Presidio fauna -- and the ability of most animals to make their way under roadways where the passageway is of sufficient size, the impact is considered adverse but minor. The Mitigation Prospectus (see response to comment 1185) attempts to resolve some of the continuing controversy over wildlife movement by studying the problem further, as a joint effort by project and NPS/Trust biologists. Since this effort will reduce impacts already considered less than significant, it will be carried out separately from the NEPA/CEQA process. Mitigation measures will be formalized as part of the Record of Decision and associated Mitigation Monitoring and Reporting Plan.</p> <p>The Summary section of the FEIS/R highlights the project commitments including working with the NPS and Trust to find the most feasible solution for accommodating the Tennessee Hollow restoration during final design. The text clearly states that the commitments are binding. It also includes a reference to Appendix K for more details on potential mitigation.</p>	1804
64	The inconsistency was explained in the explanatory note in italics at the bottom of Exhibit 3-85.	1805
65	The text under NPS and Trust-Protected Cowardian Wetlands in the Affect Environment of Section 3.4.2 was modified as suggested.	1806
66	The project team was instructed by Caltrans and FHWA to remove the term "significant" from the discussion of impacts in Chapter 3 of the FEIS/R as the only place that language can be used is in the CEQA analysis (Chapter 4).	1807
67	Marshall Street has been added to the sentence.	1808
68	The text was revised as suggested.	1809



Comments on the Doyle Drive Project DEIS/R

Reviewer: GGNRA

Reviewer's Comment Number	Response	Database ID
69	The discussion of cumulative impacts on hydrology was expanded in the FEIS/R.	1810
70	The text was revised as suggested.	1811
71	The text under the discussion of Permanent Impacts for Alternative 2 (Section 3.2.10) has been revised to include the points raised in Comment Number 1761. The visual effects cited in the comment are consistent with the findings in the Draft EIS and Visual Impact Assessment and provide additional examples of why Alternative 2- No Detour Option was found to result in an adverse impact to viewpoints at the Main Post. We concur with the comment that while the visual simulations provide an accurate depiction of the project from specific viewpoints, they do not clearly show the increased scale and massing of Alternative 2 - No Detour Option that would be apparent to a wide range of viewers in the Main Post and Crissy field areas.	1812
72	The comment is correct that light and glare from automobile headlights would be reduced by placing a portion of the roadway in a tunnel section.	1813
73	The text under the discussion of Permanent Impacts to Alternative 2 in Section 3.2.10 has been revised to include the points raised in the comment. The visual effects cited in the comment are consistent with the findings in the Draft EIS/R and Visual Impact Assessment and provide additional examples of why Alternative 2- No Detour Option was found to result in an adverse impact to viewpoints at the Main Post.	1814
74	Comment noted. The comment is correct assuming the initial assessment of the adverse impact was correct.	1815
75	Stablization/ Monitoring/ Security During Construction in Section 3.2.11 includes a discussion of the development of intrepertive and education materials. The Programmatic Agreement prepared as part of the project and included as Apendix I of the FEIS/R also includes those mitigation measures for impacts to cultural resources.	1816
76	Text under Land Use for Permanent Impact discussion of Alternative 5 was revised as suggested (see Section 3.2.1).	1817
77	Text was revised as suggested.	1818



REC'D MAR 31 2006

March 31, 2006

Mr. Leroy L. Saage, PE
Project Manager
San Francisco County Transportation Authority
100 Van Ness Avenue, 25th Floor
San Francisco, CA 94102

RE: Doyle Drive Draft EIS/EIR

Dear Mr. Saage:

Thank you for the opportunity to review the Draft Environmental Impact Statement/Report (EIS/EIR) for the Doyle Drive replacement project. The Presidio Trust (Trust) has jurisdiction over the project area, and as a cooperating agency under the National Environmental Policy Act (NEPA) may adopt the FEIS in making decisions relative to the proposed project. Presidio Trust staff have devoted considerable time towards participation in the NEPA process, from the scoping period to the present day, and have developed additional information and provided critical staff support.

The Trust recognizes the public policy imperative inherent in seismic retrofit projects such as Doyle Drive, as well as the benefits to traffic safety and accessibility that will accrue as a result of the proposed project. Beyond the critical life safety benefits of a new roadway, we believe that the successful transformation of Doyle Drive is crucial to the ultimate success of the Presidio as a national park and public asset. We urge SFCTA, Caltrans, and FHWA to aggressively complete the necessary environmental and historical compliance, to expedite the engineering and design required to finalize the roadway design, and to quickly secure necessary funding to rebuild this critical artery. The Presidio Trust is ready and willing to do our part to meet this challenge.

We recognize and applaud the substantial effort that is evident in the document forwarded for our review. Numerous "big picture" comments are provided in this cover letter, along with more specific comments within the attached matrix. We request that these comments be addressed through revisions/additions to the document and additional improvements to the proposed alternatives prior to publishing the FEIS, which will

ultimately form the basis for a record of decision by the Trust, the Federal Highway Administration (FHWA), and other agencies involved.

Identification of a Preferred Alternative. The Trust looks forward to assisting in the identification of a preferred alternative, and subsequent actions to follow. The Trust believes that the Parkway Alternative with the Diamond Interchange and Hook Ramp options best meets the purpose and need of the project. The Trust does not believe the Merchant Slip Ramp sufficiently improves the project to justify the impacts to park property and believes that the weaving issues could be mitigated in other less damaging ways within the Golden Gate Bridge District's control.

1

The Trust's decision to support the Parkway is based upon our involvement in the preparation and subsequent evaluation of the DEIS. The Parkway meets the objectives of the Presidio Trust Management Plan (the Trust's land use policy plan for Area B of the Presidio), better meets the stated objective to replace Doyle Drive within the context of the Presidio and its function as a national park, provides more "park land" when the areas over the tunnels are considered, improves access to the park, and is designed to better fit into the landscape of the Presidio. The Trust believes there are no park benefits from the Replace and Widen alternative. The Replace and Widen Alternative simply attempts to limit direct impacts to specific park resources by design while increasing the impact (shading, mass and scale, light, noise, visual) from an elevated freeway to a wider area of the park.

Agency Roles. As the document shifts to an FEIS, the authors need to recognize that the Trust is the federal agency with jurisdiction over Area B of the Presidio that includes virtually the entire project area. The document needs to remain mindful of the Presidio Trust Act and Presidio Trust Management Plan and make explicit the Trust's resource protection mandate as well as its imperative to achieve financial self-sufficiency by 2013 through revenue-generating use of the Presidio's built environment. Where the proposed project conflicts with these authorities, these conflicts should be identified and resolved in favor of the Trust's controlling authorities or avoided. Where impacts cannot be so resolved or avoided, comprehensive, specific mitigation measures should be developed.

2

Context Sensitive Design/Solutions. The Trust's past design comments have been used to improve the action alternatives. By continuing to work cooperatively and in the spirit of CSD/S, project engineers may address continuing concerns to refine project alternatives and minimize use of parklands (see below). The questions the Trust will seek to answer in reviewing the FEIS are whether the project includes all possible planning to minimize harm, including deviation from otherwise applicable design standards, and whether the above-ground transportation facilities proposed have an aesthetic more fitting to a national park than a conventional highway facility. The Trust will continue ongoing discussion with the project proponents regarding design, use, and control of the land over the tunnels. It will be unacceptable to the Trust that control of the land over the tunnels following completion of the project not lie with the Trust.

3

The alternatives as proposed continue to present negative impacts that could be controlled or eliminated with further refinements. Project engineers should continue to refine the proposed alternatives, and reduce the width or “footprint” of all proposed facilities, including the interchanges and main line portions. Unless these (and other) impacts can be avoided, the Trust will expect full compensation for financial impacts and mitigation of impacts to historic, natural, scenic, and recreational resources.

4

Right of Way Impacts and Financial Self Sufficiency. The current analysis does not adequately assess impacts to the Trust due to lost revenue during and following construction. Fulfillment of the Presidio Trust Act’s mandates requires that buildings be leased to generate the revenue required to fund all annual operating expenses (estimated at between \$40 and \$52 million annually) by 2013, and to fund all capital improvements (estimated at \$589 million) required to preserve Area B of the Presidio as a national park site in perpetuity. Significantly, the proposed alternatives would

5

- utilize up to ten percent of the land area under Trust jurisdiction for a construction period of five years or perhaps longer,
- impact access to the Presidio for visitors, residents, tenants, and tenants’ clients and business associates,
- temporarily restrict use of an undisclosed number of buildings,
- permanently remove up to nine buildings totaling over 240,000 square feet,
- permanently use an additional 23,000 square foot building for an operations and maintenance center, and
- displace parking that serves some of the Trust’s most marketable buildings.

These actions would dramatically affect the Trust’s ability to generate revenue, potentially affecting achievement of financial self sufficiency by 2013 and/or substantially lengthening the time required to complete planned capital improvements. These potential effects of the project should be assessed with specificity, reduced to the maximum extent feasible, and fully mitigated.

Financing Plan. A detailed financing plan is needed for the FEIS to demonstrate the feasibility of the proposed alternatives. Available funding itself (Exhibit I-7) should be updated and described in more detail. A strategy needs be described for securing the additional required funding.

6

Construction Period Effects and Project Timing. Specific construction staging for the proposed alternatives needs to be provided in the FEIS, along with substantial additional detail regarding construction period impacts. Effects that cannot be avoided will need clearly defined mitigations.

7

Physical and socioeconomic effects assessed in the EIS will require reevaluation prior to construction, since construction is likely to begin three or more years in the future. Specifically, pre-construction reevaluation will be needed in order to determine changed circumstances that may result in new impacts, or may increase the severity of impacts already identified. For example, several of the technical reports need to remain living documents (CIA, parking, etc.) and will need to be updated for the FEIS and prior to

8

construction. Since the Trust intends to continue the pursuit of leasing of buildings in the project vicinity, the assessment of land use and displacement impacts will have to be reviewed, an updated assessment of relocation costs will be required, as will an updated estimate of costs associated with compensation for facilities impaired, damaged, or eliminated and lost revenue.

“Use” Under Section 4(f). The Draft 4(f) analysis provides neither a qualitative nor adequate quantitative analysis of effects on the NHLD or the parkland under Trust jurisdiction. In addition to omitting discussion of impacts to the Trust’s revenue that may affect preservation of the Presidio as parkland (see above), the Draft 4(f) analysis fails to address effects on parkland due to the substantial impairment of open space and buildings immediately adjacent to the proposed facilities. These effects will include impacts to the historic setting of the cavalry stables, potential noise increases affecting the stables, houses on Pilots Row and Ruckman Ave., the Crissy Center educational facility, the Gorgas Avenue warehouses, and other buildings, along with visual impacts throughout the corridor, and taking of parkland and associated resources like recreational facilities and trees. Working with the Trust, the project proponent should continue to refine the alternatives to minimize harm to 4(f) resources to the maximum extent feasible.

9

Mitigation. A comprehensive and coherent mitigation program for the proposed alternatives needs to be developed in consultation with Trust staff during the preparation of the FEIS. Mitigation should include measures to minimize loss of parking and disruption during construction, maximize access to the Presidio, and ensure maximum protection of natural, cultural, and water resources. Mitigation needs to include measures to address financial impacts including loss of revenue and revenue generating potential. The Trust expects an enforceable agreement regarding implementation and monitoring of mitigation measures.

10

Trust staff would be happy to meet with you and discuss any of these comments or those within the attached matrix.

Sincerely,



Michael Boland
Director of Planning and Park Projects

- cc. Gary N. Hamby, Division Administrator, FIWA
- Bijan Sartipi, Caltrans
- Presidio Trust Board of Directors
- Craig Middleton
- Brian O’Neill

Chap	Page #	Trust Comment	ADEIS reference #
3	27	Affected Environment - The portion of Mountain Lake Park managed by the city and county of San Francisco is not located within the Presidio boundaries. The rest is inside the Presidio.	460
3	47 and 48	The parking analysis presented does not match the September 2004 Parking Impact Analysis Report. See Trust's previous comments of Technical Report as the Trust still has issues with the analysis. Each report will need to be updated for FEIS and prior to construction.	470
3	122	Caltrans, not the Trust, should be responsible for any stormwater management plan required for this proposed action. Recommend replacement of reference in first full paragraph with the following: "Caltrans, in coordination with the Presidio Trust, will prepare a stormwater management plan and comply with other provisions of this permit.	701
3	131-133	Listing the elevation of the Richardson conform and Halleck Tunnel portal seems important in the Flooding section.	575
3	133	Top paragraph of this section discusses slopes around the tunnels. There has been some discussion about recreating the "bluff" appearance between the Main Post and Crissy Field, this should be discussed here in the FEIS once decided through the CSS/S process. The Trust has a rendering that the Project Proponent may find useful to change the thinking about how the bluff will eventually be reconstructed.	600
3	159	Coordinate Construction with Ongoing Remediation Actions: The Trust expects to <u>only</u> be responsible for certain previously-identified remediation sites. The Trust expects that many potential remediation costs will be the subject of future negotiation with the project proponents and possibly other parties. The revised text does not go far enough to state that the Trust's responsibility is limited.	605
3	209	paragraph under the bullets for Biological Environment - The language you use to incorporate the NES technical study should be used throughout the document in these opening paragraphs to incorporate the other technical studies. In other places you use less clear language that the technical studies are incorporated.	
3	213	Exhibit 3-64 does not identify a number of native vegetation areas within the project study area. Update using map provided during ADEIS review process.	633
3	224	Discussion of wetlands should also include that wetlands are important habitat for wildlife.	643
3	225	Under NPS and Trust policies, please include that the Trust protects all USFWS wetlands.	644
3	226	Affected environment/ACOE and Cowardin wetlands please clarify at the beginning of this section that a) the Trust protects both ACOE and Cowardin wetlands, and b) that all ACOE wetlands are also defined as Cowardin wetlands. In various places, the text implies that the Trust policies do not protect ACOE wetlands. This implication is particularly true in the first several paragraphs on page 194.	686
3	228	Second paragraph - total acreage for wetlands is different than the total acreage in Table 3-67. Fifth paragraph states that NPS and the Trust place high value on wetlands because they "may provide habitat for common wildlife species". Please modify this sentence; it is well understood that wetlands do (not may) provide habitat for a variety of wildlife species; these species are not limited to "common" wildlife.	645

Chap	Page #	Trust Comment	ADEIS reference #
3	231	Please explain what "temporary" impacts are.	646
3	233	First paragraph states that groundwater flows in the vicinity of the tunnels "can be increased or decreased" through equipment incorporated into the project. Please expand the discussion to better identify how the groundwater flows can be adjusted, the implications for vegetation and hydrology in doing so, and what entity would be responsible or able to "adjust" flows. The hydrologic implications for this should also be included in the hydrology section of the EIS. Exhibit 3.68: Please indicate which wetlands are impacted.	648
3	234	Second to last paragraph -- clarify that the .07 hectare is <u>in addition</u> to the wetlands defined as ACOE. Please clarify this also in the last paragraph on page 197.	652
3	235	Compensation measures -- first sentence, change "may include" to "will include".	654
3	238	The <i>Vegetation Management Plan (VMP)</i> should be included in the list of documents.	659
3	250	Coyote and grey fox should be included in the Exhibit 3.74.	671
3	257	Second paragraph identifies an affect to the forest and arroyo willow wetlands from construction of the project. Coastal scrub is also found in the construction corridor. This habitat community should also be included in the discussion.	673
3	257	The discussion of impacts to nesting birds correctly notes the potential to "briefly abandon a nest". The discussion should also include that with ongoing disturbance, birds may permanently abandon nests, decreasing their reproductive success.	674
3	258	This discussion of avoidance, minimization, and/or mitigation measures regarding wildlife protection is inadequate. While some mitigation measures may be situation specific (particularly relative to nesting birds), the EIS should identify the mitigation measures that will be implemented to reduce harm to wildlife. For example will the project include work at night? The impacts to nesting wildlife may be greater than work only during day light hours. How will the project provide at least some corridor for wildlife in a north-south direction (i.e., phasing of the project)?	
3	259	Invasive species: Discussion under Affected Environment should also include disturbance to willow riparian habitat.	676
3	260	Again, the discussion regarding the "highly disturbed" nature of the forest understory needs to account for the remnant native plant populations.	677
7	46	The Trust believes that a broader analysis and consideration of the Project's effects upon the Trust's financial situation (and the concomitant impacts on the Presidio) is mandated by section 4(f) of the Department of Transportation Act of 1966. As the DEIS points out at page 7-1, where parkland must be used for a transportation project because there is no prudent and feasible alternative to using that land, then the sponsoring agencies must insure the project "includes all possible planning to minimize harm to the park...or historic site resulting from the use." While compensation is briefly referenced in section 7.7.4 as a minimization measure, the Trust believes that section 4(f) requires an expansive view and discussion of this compensation. Change the first sentence of section 7.7.4 to read, "The Trust, as the land managers, would be compensated as applicable by law for the damage or removal of buildings, resources, or other loss."	732

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Chap	Page #	Trust Comment	AREIS reference #
7	49	Second paragraph under 7.8 Coordination - Remove the sentence, "NPS also has an interest in the management of natural and historic resources within Area B." NPS has no legal authority over either of these areas of management which is what this sentence implies. If you choose to leave the sentence, then list all of the other agencies and organizations with an "interest" in Presidio natural and historic resources.	
General		Removal and replacement of the Mason Street Warehouses. The FIS/EIR says is various places that the Mason warehouses will be temporarily removed and then replaced (p 2-60), that they will be removed without confirming that they will be replaced (i.e. 3-52, 3-114, 3-119). During the development of the first screening criteria and early alternatives, removal was only considered by the NPS and PT if in conjunction with replacement. Permanent removal will cause boundary erosion of the north east boundary of the Presidio and therefore present an unacceptable adverse effect. The concept of removal and not returning the buildings is inconsistent with the FOF and Section 106 consultation underway. Retention of these buildings was a key component of the original Crissy Marsh Section 106 consultation that allowed removal of approx. 40 historic buildings. Unless it can be determined that these buildings will (commitment of the project proponent) be replaced on their foundations following removal of the Detour, the Trust will continue to oppose the Replace and Widen alternative with Detour Option.	482
	General 1	Consider how shade impacts of the alternatives can be improved in the future Crissy Marsh/Tennessee Hollow corridor. Seek to improve a) plant establishment including extent, density, and diversity of vegetation expected, and b) the wildlife use of the Crissy Marsh/Tennessee Hollow corridor resulting from improved vegetation cover. Seek to improve the range of habitat likely under restoration of the corridor - upland, woodland, willow riparian, freshwater marsh, brackish marsh, and tidal marsh.	



Comments on the Doyle Drive Project DEIS/R

Reviewer: Presidio Trust

Reviewer's Comment Number	Response	Database ID
1	Support for Alternative 5 with Diamond Interchange Option and Hook Ramp noted. Opposition to the Merchant Slip Ramp noted.	1420
2	All efforts have been made to avoid to the greatest extent possible the built and natural environments of the Presidio. As part of the FEIS/R, a Mitigation Monitoring and Reporting Plan will be developed to document and track the successful implementation of proposed mitigation measures. The mitigation summary document is provided in the Appendix K of the FEIS/R.	1421
3	The project will continue to work cooperatively with the Presidio Trust and in the spirit of CSDIS through the final design. The area over the tunnels will be returned to the Presidio Trust.	1422
4	Appropriate compensation will be determined once impacts are assessed and level of compensation as applicable by law is determined. The lead agencies have committed to continued involvement of the cooperating and responsible agencies throughout detailed design and construction.	1423
5	Compensation based on impacts will be determined once impacts are assessed and level of compensation as applicable by law is determined. The following sentence was added to the Avoidance, Minimization and/or Mitigation Measures portion of FEIS/R Section 3.2.6, "The compensation will be determined and implemented as part of the right-of-way acquisition process."	1424
6	The updated funding plan for the project is provided in Section 1.7. The SFCTA is currently studying the feasibility of a toll facility to off-set the project costs. A discussion of tolling status has been added to Section 1.7. Updated project cost estimates are provided in Section 2.7 of the FEIS/R. Under SAFETEA-LU guidelines, the Initial Financial Plan should be submitted and approved by FHWA before authorization of Federal-aid funding for mainline project construction.	1425
7	Construction activities and proposed staging for the Preferred Alternative are presented in Section 2.9 of the FEIS/R. Construction impacts to individual resources are described under the Temporary Impacts section of the each resource in Chapter 3.	1426
8	Technical Addendums were produced for the Traffic, Noise & Vibration, Natural Resource, Cultural Resource and Parking studies. Additional work was compiled for the Energy and Cumulative impact sections. These elements are incorporated into Chapters 3, 4 and 5 of the FEIS/R. As noted by the commenter the relocation portion of the CIA and Parking technical reports will need to be revised periodically as the prevailing conditions change.	1427
9	The Final Section 4(f) Evaluation (Chapter 7 of the FEIS/R) contains a thorough discussion of the issues raised by the commenter. Precise compensation based on impacts will be determined once impacts are assessed and level of compensation as applicable by law is determined.	1428
10	A Mitigation Monitoring and Reporting Plan is a required element of this project and will be developed in consultation with the Presidio Trust and NPS. Text was revised as suggested to read "An enforceable mitigation plan is a required element...."	1429



Comments on the Doyle Drive Project DEIS/R

Reviewer: Presidio Trust

Reviewer's Comment Number	Response	Database ID
11	The text was revised to clearly state that the portion of Mountain Lake Park managed by the City and County of San Francisco is not located within the Presidio boundaries while the rest of the park is inside the Presidio.	1430
12	An addendum to the September 2004 Final Parking Impact Analysis Technical Report has been prepared subsequent to the selection of the Preferred Alternative based on the recently revised building use assumptions and parking supply conditions; the FEIS was updated accordingly.	1431
13	The stormwater data report is complete and will be refined during final design. Caltrans is responsible for the plan for the facility, however, the Trust will need their own plan for the area which the project team will comply. It is acknowledged that the Presidio Trust considers the routing of first flush storm flows to the SFPUC collection system for off-site treatment.	1432
14	The elevation of the proposed Richardson conform is 4.5 meters (14.7 feet) and elevations of the proposed roadways at the Halleck Tunnel portals are in the range of 2.0-2.5 meters (6.6 -8.2 feet) and are listed in Section 3.3.1, Permanent Impacts, Alternative 5, Flooding of the FEIS/R.	1433
15	The area referenced in the comment was studied in the Visual Impact Assessment and visual simulations of the tunnel area between the Main Post and Crissy Field were prepared (viewpoints 7 and 8). The VIA concludes that removal of the low viaduct under the Presidio Parkway Alternative and replacing it with a grassy hill would improve the intactness and unity of the area. Additional treatment of the hill and slope areas around the tunnel section to recreate the bluff would further improve the overall visual quality of the area.	1434
16	The text under 'Coordinate Construction with Ongoing Remediation Actions" in Section 3.3.3 was revised to include language regarding the existing agreements between the Army, Presidio Trust and NPS; to reflect the ongoing remediation efforts by the Presidio Trust; and to note the coordination of future remediation with Caltrans and SFCTA.	1435
17	The NES is referenced in Section 3.4 of the FEIS/R.	1436
18	Exhibit was revised to reflect the native plant resources in the project area.	1437
19	The text "Wetlands support high wildlife diversity as well as a water source for species associated with upland habitats" has been added to the introduction of Section 3.4.2.	1438
20	Bullet text in Section 3.4.2 was revised to read "... U.S. Fish and Wildlife Service (USFWS) wetlands according to the Cowardin classification system (Cowardin et al. 1979) that are protected, along with Waters of the United States, by the National Park Service". The Presidio Trust's and NPS' specific policies are stated in the NES in Section 3.5. The NES is incorporated in the EIS/R by reference.	1439



Comments on the Doyle Drive Project DEIS/R

Reviewer: Presidio Trust

Reviewer's Comment Number	Response	Database ID
21	Text and wetland exhibit was revised accordingly.	1440
22	Text has been corrected in response to both comments.	1441
23	Temporary is used in the conventional sense of the word, i.e. limited in time. As a practical matter, temporary impacts are those which do not permanently change land cover into part of the built environment and which can therefore be restored. The Project will implement a program for "Revegetation of Temporarily Disturbed Vegetation," described for example in Section 3.4.3, Plant Species. The EIS/R considers that full restoration will take approximately five years.	1442
24	See Response to Comment #1804. Refer to Hydrology section (3.3.1) regarding hydrologic issues. Temporarily affected wetlands have been stated in the exhibit.	1443
25	It has been stated in the document where the totals in the wetland types are different and where the wetlands are co-located.	1444
26	Text was changed as requested.	1445
27	The Vegetation Management Plan is listed at the beginning of Section 3.4.1	1446
28	Coyote and Gray Fox were added to the exhibit.	1447
29	Understory coastal scrub is included in the discussion of Northern Coastal Scrub (Section 3.4.1) and is part of the impact acreage.	1448
30	Text was changed to read "temporarily or permanently abandon" the nest.	1449
31	The project will have an adverse effect on wildlife, as is clearly stated in the EIS/R. Much of it is practically unavoidable. Mitigation and minimization measures are not intended to apply to all species and to all types of impacts identified, but to those impacts which would be considered significant in the absence of such measures. Overly comprehensive mitigation sometimes defeats its own purpose, and the commenter offers a good example of this. Building the project in phases to allow for wildlife movement would mean a longer construction period or an inefficient and awkward mobilization of equipment, or both, with arguably a net increase in disturbance.	1450



Comments on the Doyle Drive Project DEIS/R

Reviewer: Presidio Trust

Reviewer's Comment Number	Response	Database ID
32	The discussion in Section 3.4.1 does include this subject, in the third paragraph under "Affected Environment."	1451
33	The discussion of the affected environment is not intended to be exhaustive, and each vegetation community is described according to its most salient characteristics, i.e., those most important for the analysis. Native plant communities are identified and considered where their presence defines a specific area. Exhibit showing Native Vegetation will be revised to reflect the native plant resources in the project area.	1452
34	The project team continues to work with the stakeholders regarding opportunities to minimize or avoid impacts to parkland and appropriate mitigation for significant impacts. The text in Section 7.7.4 was modified to:would be compensated as applicable by law for the removal or permanent removal of buildings. The compensation would be determined and implemented as part of the right-of-way acquisition process.	1453
35	Text in Section 7.8 was revised to accurately depict respective areas of jurisdiction.	1454
36	The FOE was revised and included in Section 3.2.11 of the FEIS/R. Project team will continue to work with the Trust regarding building preservation, movement, and removal.	1455
37	<p>The discussion of the Tennessee Hollow riparian corridor connection to Crissy Marsh in Section 3.2.1 was enhanced with more detailed discussion of each alternative alignment in the area and includes graphics depicting the area of restoration which will be available under each alternative. Information regarding the shade issue is included in the Plans and Policies section under the PTMP discussion of Section 3.2.1 of the FEIS/R. Conclusions are correctly interpreted but somewhat qualitative. Further detail of the shade analysis is available in Appendix B of the Final Community Impact Assessment (August 2006) which is included on CD with DEIS/R, additional copies available on request. The EIS cannot effectively model or predict complex suites of plant and animal responses to the project, except to conclude that, overall, this is not significant in the context of the existing environment.</p> <p>The Summary section of the FEIS/R highlights the project commitments including working with the NPS and Trust to find the most feasible solution for accommodating the Tennessee Hollow restoration during final design. The text clearly states that the commitments are binding. It also includes a reference to Appendix K for more details on potential mitigation.</p>	1456



San Francisco Public Utilities Commission Wastewater Enterprise



April 4, 2006

Leroy L. Saage,
San Francisco County Transportation Authority
100 Van Ness Avenue
25th Floor
San Francisco, CA 94102

Gavin Newsom
Mayor

Richard Sklar
President

Ann Moller Caen
Vice President

E. Dennis Normandy
Adam Werbach
Ryan L. Brooks

Susan Leal
General Manager

Subject: Doyle Drive Draft EIS/EIR

Dear Mr. Saage:

This letter comments on the draft Environmental Impact Statement/Report (EIS/R) concerning the renovation of Doyle Drive in the San Francisco Presidio south and east of the Golden Gate Bridge. Our comments are on behalf of the San Francisco Public Utilities Commission (SFPUC), which is responsible for the management of the city's combined sewer system, and which collects and treats sanitary wastewater and stormwater flows in San Francisco. The SFPUC is concerned that the environmental review has not included sufficient analysis to fully evaluate the potential impacts of the new wastewater flows proposed to be introduced into the city's combined sewer system. The San Francisco County Transportation Authority (SFCTA) (the project lead agency) should provide more information in the EIS/R to characterize the potential impacts of increased flows and increased pollutant loads to the city's combined sewer system. Our specific comments are as follows:

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1. New Flows to City Combined Sewer System: Any new flows introduced into the city's combined sewer system from construction dewatering and stormwater runoff – either directly or from the Presidio's sanitary sewer system – could negatively impact the SFPUC's compliance operations for the city's combined sewer system. The proposed discharges in the project would flow into the Bayside portion of the city's combined sewer system, which is regulated by a permit issued by the Regional Water Quality Control Board. The Board permit stipulates the average annual combined sewer system discharge events that can occur in any given area of the city. The environmental review for the proposed project should thoroughly examine the effects of any increased flows to the city's sewer system and the SFPUC's compliance operations for the combined sewer system, and should propose the means to mitigate those effects. The SFPUC is not in a position to accept new flows in the sewer system unless analytical information indicates that the new flows would not have any adverse impact. We believe moving

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adverse impacts downstream, into our system, is neither mitigation nor is it appropriate.

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2. Existing Hazards (pp. 125-127)/Flood Protection (p. 135): FEMA is revising the flood hazard map to include storm surge hazard areas. The City and County of San Francisco will be included in the revised hazard map. The Project Agencies should consider whether the revised FEMA flood hazard map zone would affect the project. In addition, the city may need to revise its planning and building requirements based on the new flood hazard zones, which could potentially impact the project.
3. Groundwater Extractions in the Marina Basin (pp. 128-131): The lagoon at the Palace of Fine Arts is a surface exposure of the Marina Groundwater Basin. Groundwater extractions from this basin may result in drawdown of the lagoon levels. The city routinely augments the lagoon with the city's potable water during summer months to maintain lagoon levels and water quality. Unless the SFCTA can demonstrate that dewatering in the Marina Basin will have no impacts on the lagoon based on distance, depth and extraction rate of dewatering, the SFPUC likely will require the Project Agencies to reimburse the SFPUC for any additional water necessary over the current average summer demand. The lagoon summer augmentation program is currently not metered so the SFPUC likely will require the Project Agencies to fund metering of summer demand prior to the beginning of planned dewatering activities. The SFCTA should consult with the SFPUC Groundwater Program Manager to conduct any analyses and mitigation of potential impacts to the lagoon.
4. Construction Dewatering (p. 129): Although the EIS/R discusses the potential for pollutants to be present in the extracted groundwater, it does not clearly discuss the fate of the groundwater. The EIS/R should include an evaluation of the groundwater extraction rates, duration and timing in order to fully assess any potential impacts to the combined sewer system. In addition, while the SFPUC may ultimately permit the discharge of the groundwater into the combined sewer system, the SFPUC Pretreatment Program may require pretreatment of that groundwater prior to discharge.
5. Permanent Impacts (pp. 130-131): In Alternative 5, twenty-five per cent of the project would be underground and thus that portion would not generate storm water runoff. Please clarify whether the Caltrans stormwater NPDES permit is or would be applicable to the

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whole project area or only to that portion of the project that would be subject to storm water runoff.

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6. Permanent Impacts (pp. 130-131): Alternative 5 states that a reduction in pollutant loading would occur because a portion of the project would be underground. This statement appears to be based on the dubious belief that a portion of nonpoint source pollutants from road runoff would be transferred to the city's sewer system. The SFPUC disagrees this approach mitigates for the potential impacts of stormwater runoff in the project and may not allow it.

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The portion of the project area in tunnels would have nonpoint source pollutant loads from vehicles and other road-related constituents. The EIS/R discusses that the tunnel washdown water would drain to a sump that would discharge to the sanitary sewer system. Since the Presidio sanitary sewer discharges to the city's combined sewer system, the sump wastewater would add to the city's sewer flow and treatment demands. As stated above, we believe this is not mitigation nor is it appropriate.

Faced with increasingly stringent water quality management requirements, the SFPUC is promoting "Low Impact Development" (LID) methods (which include the use of stormwater BMPs) to capture, detain and retain runoff flow from impervious surfaces before those flows reach the city's sewer system. These methods should be applied to street runoff in new development whenever possible, as well as to tunnel washdown water. LID methods provide greater cost-efficiency for the management of nonpoint source pollutants in urban runoff generated by cars and road runoff. In addition, using LID methods for the tunnel segments would be consistent with the Mayor's Better Streets Program.

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7. Managing Water Quality from Construction Dewatering (p. 137-138): The SFCTA should be aware that although the SFPUC Pretreatment Program routinely regulates the discharge of dewatering flows to the combined sewer system by permit, the discharge permit usually stipulates that the SFPUC may temporarily stop dewatering flows to minimize impact of the flows during wet weather. Any plans to discharge flows to the city's combined sewer system would need to be coordinated with the SFPUC Pretreatment Program Manager.

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8. Storm Water Treatment (p. 138-139): *Option 1* is listed as the preferred alternative for storm water management with storm water runoff and tunnel washdown water routed to the city's sewer system, while *Option 2* has runoff and washdown water managed near the source using storm water BMPs. The SFPUC disagrees with *Option 1* as the preferred plan. As discussed above, the SFPUC is facing increasingly stringent water quality requirements. Using LID methods to minimize nonpoint source pollutants at the source, as discussed in *Option 2*, would help to alleviate the burden of nonpoint source pollution management and treatment for the SFPUC and its ratepayers.

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9. General Comments – Increased Flows in Presidio Sanitary Sewer System: The Presidio Trust pays the SFPUC to collect and treat sanitary wastewater from the Presidio. Any increases in flows from construction dewatering or permanent impacts could significantly increase the Trust's fees to the city. The EIS/R does not provide any information to indicate the Presidio Trust has approved the additional costs it may incur.

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Thank you for the opportunity to comment on this project. We are concerned about the proposal from a number of different perspectives. The SFPUC would be please to discuss these comments with you, Caltrans and any other project sponsors, as well as the Presidio Trust, to determine how this project can adequately mitigate for the potential impacts to the city's combined sewer system.

Sincerely,

William Keaney
Planning Manager

Cc: Jared Goldfine, Caltrans
Bruce Wolfe, Regional Board
Nelson Wong, DPW
Dianna Sokolove, Planning
Michael Boland, Director of Planning, Presidio Trust

bcc. Robert Hickman

Susan Glendening



Comments on the Doyle Drive Project DEIS/R

Reviewer: San Francisco Public Utilities Commission

Reviewer's Comment Number	Response	Database ID
1	The project team has met with the PUC and Caltrans to further develop the mitigation discussed in Section 3.3.1 of the FEIS/R. It has been confirmed that there is adequate space along the alignment to treat stormwater runoff on-site, if necessary.	1374
2	The project team has met with the PUC and Caltrans to further develop the mitigation discussed in Section 3.3.1 of the FEIS/R. It has been confirmed that there is adequate space along the alignment to treat stormwater runoff on-site, if necessary.	1375
3	The current design is based on the best available information on coastal hazard wave runup elevations. It is acknowledged that new studies are in progress to further refine expected coastal hazards.	1376
4	The nearest tunnel segment (west of Halleck Street), where substantial dewatering is likely to occur, is over one-quarter-mile away from the Palace of Fine Arts Lagoon. It would be unlikely that dewatering activities at that distance would have any effect on the lagoon levels. However, the preparers of the EIS/R agree that it would be necessary to either demonstrate the lack of expected impact using detailed hydraulic calculations or, if calculations indicate an impact could occur to lagoon levels, contribute to the cost of replenishment. The following mitigation measure was added to the Avoidance, Minimization and/or Mitigation Measures of Section 3.3.1: The project proponent shall either 1) demonstrate through detailed hydraulic calculation that project-related effects of dewatering on the Palace of Fine Arts Lagoon levels would not be substantial, or 2) enter into an agreement with the SFPUC to contribute to cost of monitoring and replenishment of lagoon levels during the dewatering operation period.	1377
5	The commenter is referred to the Avoidance, Minimization and/or Mitigation Measures of Section 3.3.1 for a detailed discussion of how the dewatering effluent would be characterized, managed, and discharged.	1378
6	The Caltrans permit covers all Caltrans right-of-way, including non-stormwater discharges (e.g. tunnel washdown water).	1379
7	The project team has met with the PUC and Caltrans to further develop the mitigation discussed in Section 3.3.1 of the FEIS/R. It has been confirmed that there is adequate space along the alignment to treat stormwater runoff on-site, if necessary.	1380
8	The project team has met with the PUC and Caltrans to further develop the mitigation discussed in Section 3.3.1 of the FEIS/R. It has been confirmed that there is adequate space along the alignment to treat stormwater runoff on-site, if necessary.	1381
9	The comment is noted for the record. The requirements for managing dewatering effluent is presented in the Avoidance, Minimization and/or Mitigation Measures of Section 3.3.1.	1382
10	The project team has met with the PUC and Caltrans to further develop the mitigation discussed in Section 3.3.1 of the FEIS/R. It has been confirmed that there is adequate space along the alignment to treat stormwater runoff on-site, if necessary.	1383
11	Cost of mitigation is not a required component of a CEQA/NEPA analysis, as long as specified mitigation is feasible but cost is a consideration in deciding among feasible options.	1384

Name: Daniel LaForte
Organization/Agency: San Francisco Recreation and Park Department
Address: McLaren Lodge, 501 Stanyan St
City: San Francisco
State: CA
Zip: 94117
E-mail: daniel.laforte@sfgov.org

Comments:

The Palace of Fine Arts was listed on the National Registry on December 5, 2005. The DEIS/R should be updated to reflect the current status.

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Comments on the Doyle Drive Project DEIS/R

Reviewer: S.F. Recreation and Park Dept

Reviewer's Comment Number	Response	Database ID
1	The text in the Affected Environment portion of Section 3.2.11 was updated to reflect the current status.	1683

REC'D MAR 06 2006



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February 28, 2006

Leroy L. Saage, Project Manager
Doyle Drive DEIS/R Comment
c/o San Francisco Transportation Authority
100 Van Ness, 26th Floor
San Francisco, CA 94102

Dear Mr. Saage:

The Transportation Authority of Marin (TAM) was pleased to receive the Draft Environmental Impact Statement/ Environmental Impact Report for the Doyle Drive Replacement project. We extend our congratulations to the San Francisco County Transportation Authority on a good quality document that appears to meet the needs of all the partners involved. Both the many travelers that pass through Marin County as well as our own residents stand to benefit from this project passing this critical milestone, moving closer to becoming a reality.

We are concerned, however, about information presented in the document as related to the funding of the project. In Chapter One, Purpose and Need, Section 1.6 Funding and Programming, there is a summary of anticipated funding sources and committed and proposed funding amounts, depicted in Exhibit 1-7. Entitled Proposed and Committed Funding Sources and Levels, this Exhibit 1-7 portrays the challenge of completing the funding package for the project. Under Other Local Funds, there is an amount of \$125 million which is footnoted as "...sources such as bridge tolls and value pricing". The implication that Golden Gate Bridge tolls will be increased to pay for the project, or toll collection on Doyle Drive itself will be implemented has not been thoroughly evaluated nor the impacts of such a strategy disclosed.

Before any plan to increase tolls or implement new tolls is put into place, substantial analysis and disclosure of impacts to Marin County residents must be conducted. There must be a thorough analysis of equity in such a strategy, whether Marin residents face an undue burden related to the benefits they receive. A number of potential operational impacts must be evaluated and disclosed, including the impacts on traffic in Marin County. The diversion of trips originating in Marin and Sonoma to the Richmond-San Rafael Bridge must be assessed. Transit incentives must be considered as well, providing options for Marin travelers to utilize transit alternatives toll free. All of these impacts must be explored in broad based public outreach.

Belvedere

Jerry Butler

Corte Madera

Melissa Gill

Fairfax

Lew Tremaine

Larkspur

Juan Lundstrom

Mill Valley

Dick Swanson

Novato

Pet Eklund

Ross

Jaanno Barr

San Anselmo

Peter Breen

San Rafael

Al Boro

Sausalito

Anny Belzer

Tiburon

Alisa Fredericks

County of Marin

Susan Adams

Hal Brown

Steve Kinsey

Charles McGlashan

Cynthia Murrey

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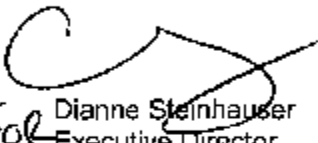
Leroy Saage
February 28, 2006
Page 2 of 2

While the Environmental Document itself establishes the impacts and associated mitigations for the project footprint, TAM requests that neither the Environmental Document or associated Project Approval action adopt any strategy related to congestion pricing or tolling until a more through analysis of toll options and impacts be conducted and discussed through broad public outreach in Marin County.

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I look forward to understanding further your plans for funding the project as well as working with you in assuring Marin County is well informed regarding that effort.

Sincerely,


For Dianne Steinhauser
Executive Director
Transportation Authority of Marin

Cc: Celia Kupersmith, GGBHTD
Suzanne Wilford, SCTA
Farhad Mansourian, MCTD



Comments on the Doyle Drive Project DEIS/R

Reviewer: The Transportation Authority of Marin

Reviewer's Comment Number	Response	Database ID
1	Comment noted.	1208
2	The SFCTA has assessed the potential of funding the project through tolling. In the summer of 2008, the San Francisco regional partner agencies confirmed they would drop the Doyle Drive tolling project from the Urban Partnership Agreement program and look to other local funding sources and cost savings to complete the project funding plan. Depending on the actual funding sources used for the project, the impacts may need to be analyzed in a Re-evaluation/Addendum of the FEIR/EIS, or a Supplemental FEIR/EIS, as appropriate Project funding is discussed in Section 1.7.	1209