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March 31, 2006

Mr. Leroy L. Saage, PE
Doyle Drive Project Manager
c/o SF County Transportation Authority
100 Van Ness Avenue, 26th Floor
San Francisco, CA 94102

Re: Draft EIS, Doyle Drive

Dear Mr. Saage:

The Alliance for a Clean Waterfront is a coalition of 26 community and environmental organizations working toward the protection and enhancement of San Francisco's water resources. The Alliance is a project of Earth Island Institute.

One of our goals is to reduce and eliminate the combined sewage overflows (CSOs) that are discharged to the Bay and Ocean during storm events. These discharges of inadequately treated sewage and stormwater are harmful to the Bay and ocean ecosystems and pose a human health risk, especially for recreational users and for people who consume Bay-caught seafood.

We have also been working to incorporate the adoption of decentralized sewage treatment as a principle to help guide the SF PUC in the development of the monumental new Sewage Master Plan. There is no excuse for exacerbating the injustice of sending more than 80% of the City's combined flows to the Southeast Treatment Plant. Water should be treated as close as possible to its source.

The Presidio is one of few areas in San Francisco that has been developed with separate systems for sanitary sewage and stormwater runoff. With the proposed water recycling facility for treating sewage and a palette of state-of-the-art, natural-systems-based stormwater treatment facilities, the Presidio could be a leader in sustainable, low-impact, self-reliant water management.

We were surprised and dismayed to see (pp. 3-138, 3-139) that the Doyle Drive project proposes to collect the stormwater runoff from the roadway and discharge it into SF's combined sewer system. Certainly the road runoff should not be going into Crissy Lagoon or the Bay untreated, but it should be treated and reused locally.

What would be the cumulative impacts on Bay and Ocean water quality from adding Doyle Drive runoff to the PUC's combined system? How would those water quality impacts subsequently affect low-income populations that rely on the bay for food? What

1

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73 of 659
a project of earth island institute 300 Broadway, Suite 28 San Francisco, CA 94133-3312

would be the additional energy consumption required to pump these increased flows to the Southeast Plant? How would the impacts be mitigated? More to the point, these impacts should be, and can be, avoided. What studies have been done to identify on-site or near-site water treatment opportunities? Has the project team considered treatment wetlands, infiltration swales, sub-surface sand filters, detention ponds, and other “low impact development” approaches to stormwater management? Constructed treatment wetlands could also be very useful during construction – to treat groundwater from dewatering activities as well as surface runoff.

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Cont

Sustainable water management calls for regarding water as a resource, not as a waste product to be disposed of. We call on the Presidio to find beneficial reuses for its water and not merely pay the SF PUC to make a problem go away. There is no away.

The EIS should identify ways to avoid the negative environmental impacts of increasing the burden on the City’s combined wastewater system, and the project sponsors should develop an ecologically sound, environmentally just, multiple-benefit program for managing Doyle Drive’s runoff.

2

Sincerely,



Jennifer Clary
Co-chairs, Alliance for a Clean Waterfront



Alex Lantsberg

Cc: Tom Franza, Assistant General Manager, SFPUC Wastewater Bureau



Comments on the Doyle Drive Project DEIS/R

Reviewer: Alliance for a Clean Waterfront

Reviewer's Comment Number	Response	Database ID
1	Coordination is currently underway with the PUC regarding runoff. Ultimately, water management will be dealt with during the detailed design phase of the project.	1170
2	It should be noted that under the existing condition, none of the runoff from the roadway is treated prior to discharge. Therefore, under either Option 1 or 2 described in the FEIS/R, there would be a net benefit to receiving water quality because the runoff will be treated. Runoff from nearly the entire City flows into the combined sewer system and is treated at one of the City's treatment plants. The FEIS/R allows for either discharge to the sanitary sewer system or for on-site treatment measures in accordance with the Caltrans Storm Water Management Plan (which is regulated by the Regional Water Quality Control Board).	1171



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March 30, 2006

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Mr. Leroy L. Saaga
100 Van Ness Ave. 26th Floor
San Francisco CA 94102

Re: Comments of the California Heritage Council
on the DEIS/R for Doyle Drive.

Dear Mr. Saaga:

Several years ago, the CHC expressed its support for Alternative #5. In light of new information and more extensive review, using current EIS documents, the CHC withdraws that position. It now takes a new position, supporting Alternative #5 ONLY with the modifications recently proposed by Michael Painter at the Feb. 22nd meeting in your offices, and ONLY with maximum safeguarding of historic structures and values, and with mitigation measures offsetting, so far as possible, the damage to the site and historic values necessarily imposed by the alternative chosen.

In the interest of public safety, we believe that replacement of the current, historic Doyle Drive structure, in spite of its setting in a National Park and National Historic Landmark District, (NHL) is indeed necessary. But that replacement must proceed with only the minimum possible adverse impact on historic structures and on the Presidio NHL. All the proposals envision a new structure with an order of magnitude twice the width of the current Doyle Drive. This will necessarily lead to a structure with adverse impacts on historic values created by its construction, its presence and its use for the life of the project- (expected to be over a century). The loss to the public, at a site central to the history of San Francisco, California, and the American West since 1776 will necessarily be devastating, even with the best of alternatives. Therefore, the project should include extensive mitigation measures for the historic values permanently lost to the public.

Mr. Leroy L. Saage

March 29, 2006

Page Two

We prefer the Presidio Parkway (Alternative 5) as the design approach for this project, provided the design evolves in a manner which follows the direction indicated in Michael Painter's design presented in a meeting in your offices on Feb.22,2006. At the easterly end of the roadway the "Diamond interchange" should be selected over the "Circle Drive" option since it avoids the destruction of the historic Presidio Pool (Building 1151). We note that the project must be designed to avoid negatively effecting buildings which contribute to the NHLUD. Since an alternative to the removal of the pool exists it must be selected.

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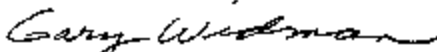
We urge the acceleration of the section 106 process and the development of an MOA between parties. We further suggest that the concept design process be accelerated. A design process for the landscape opportunities opened up by the creation of tunnels should also be integrated into the design approach so that the visitor experience is enhanced. This should include the area above the tunnel at the cemetery and the adjacent batteries Slaughter and Blaney, as well as the area between the project and Mason Street. These design processes should parallel the project design process.

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The CHC welcomes every opportunity to work with you to bring about the best possible project for this historically sensitive and uniquely important NHLUD. We would especially welcome a chance to work with you in designing mitigation measure that would the public better understand and appreciate the Presidio's history, including the people and the historic decisions made there to offset the loss created by a new Doyle Drive.

Sincerely,



Gary Widman

President

cc: Congresswoman Nancy Pelosi
Craig Middleton, Executive Director, Presidio Trust
Brian O'Neill, General Superintendent, GGNRA
Ric Borjes, Federal Preservation Officer, Presidio Trust
Michael Boland
Rick Foster, GGNRA
Craig Kenkel, Chief, Cultural Resources, GGNRA
Michael Buhler, National Trust for Historic Preservation



Comments on the Doyle Drive Project DEIS/R

Reviewer: California Heritage Council

Reviewer's Comment Number	Response	Database ID
1	Preference for Alternative 5 conditional on Michael Painter's modification's noted.	1334
2	Adverse effects to historic district will be addressed through development and implementation of the Programmatic Agreement.	1335
3	Preference for Alternative 5 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.	1336
4	The Programmatic Agreement process is underway and consulting parties and interested parties have been meeting to develop the terms of the PA.	1337
5	Details regarding the final design of the roadway and landscaping will be developed in the final design process. Final landscape decisions will reflect guidance from the historic treatment plan if the area is a cultural landscape and would be made in coordination with the Presidio Trust and VMP to ensure overall integration with the Presidio.	1338



Comments on the Doyle Drive Project DEIS/R

Reviewer: Council on America's Military Past - U.S.A.

Reviewer's Comment Number	Response	Database ID
1	Preference for Alternative 2 noted.	1366

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COW HOLLOW ASSOCIATION
P.O. BOX 471125 SAN FRANCISCO, CA 94147 TEL: 415.765.1841



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

March 30, 2006

Mr. Sange:

Below, please find our comments on the Draft Environmental Impact Statement/Report (DEIS/R) for the proposed replacement of Doyle Drive. This is the official response from the Cow Hollow Association (CHA).

The CHA, bounded by Lyon, Pierce, Greenwich, and Pacific, represents approximately 1,900 residents. Our Association is dedicated to the preservation of the residential character of the Cow Hollow neighborhood. As you know the CHA has had a delegate, Tony Imhof, from our board participate in your design process. We appreciate all of the work that has gone into the project.

When the CHA board and some of its residents initially reviewed the DEIS/R, many preferred Alternative #5 (Parkway) for its aesthetic appeal. However, we cannot support this Alternative as it stands because, upon further study, many residents and members of the board have expressed the following objections.

Cow Hollow Association Objections

Traffic Distribution between Lombard and Marina Blvd.

As one of the closest Neighborhood Organizations to the Richardson - Lombard egress from Doyle Drive, we are extremely concerned with the ramifications of any changes in the traffic distribution between the existing major Doyle Drive access points of Marina Blvd. and Richardson/Lombard.

The DEIS/R proposes a difficult transition to Marina Blvd. which will drastically alter the ratio of the traffic using Marina Blvd. versus Lombard. This is almost certain to create further congestion along the Lombard corridor with the consequence of escaping traffic then diverting through Cow Hollow neighborhoods to get to Divisadero, Gough and VanNess.

The DEIS/R Parkway design, which provides a signalized looping roadway to Marina Blvd., with as many as two additional intersections to maneuver, would be a major deterrent to traffic that currently choose that route. In the draft plan, the north bound

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(west) entrance from Marina Blvd. to Girard/Doyle Drive (also Presidio Access) is reduced to a single lane. This, in particular, seems a formula for disaster if Marina Blvd. signage is ever to be changed to the timed traffic signals, (which we favor), and which could be required with anticipated future traffic shifts.

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The DEIS/R traffic models which we have studied do show a significant increase from this downgrading of Marina egress in westbound PM traffic entering Doyle from the Lombard corridor. The extent of this increased traffic has not shown up in the Level of Service documents due to the significant modeled traffic cut-through entering Richardson/Doyle from Francisco Blvd. This traffic avoids the modeled intersections yet puts an additional 4,100 cars on neighborhood streets.

Short Cuts From Gorgas to Lyon

We do feel that the direct Presidio access provided by the Parkway alternative has the potential for relieving some of the traffic currently coming through our neighborhoods to access the park through the Lombard gate. It should also reroute some of that traffic using the Presidio gate to access Presidio Heights and points south. However, it distinctly appears that this new exit, linked as it is to the existing Lyon Street connector from Gorgas Ave, will funnel short-cutting traffic to our residential streets whenever there is a tie up on Doyle and Richardson.

3

Impact of Bus Rapid Transit project

Several changes currently proposed by the SF Transportation Authority could also impact the modeled traffic patterns from the Golden Gate Bridge and Doyle Drive. The Bus Rapid Transit proposals for both Geary Blvd. and Van Ness Ave. could potentially shift more Geary traffic (via Park Presidio Blvd.) to east bound Doyle and onto Lombard. In addition, the Lombard traffic will further slow down due to the reduced lane along Van Ness for the dedicated bus route. Lombard will become a parking lot. This would push additional traffic to the only alternate connection to downtown which is Marina/Bay Streets or through our neighborhoods.

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We urge the Transportation Authority to join us in requesting an area wide transportation study to incorporate some of these issues. We should not be downsizing any of the traffic alternatives without looking at the bigger picture.

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Suggested Design Changes

Several changes or design selections may help to reduce our objections to Alternative #5 as currently shown. These changes would not materially affect the overall Parkway design of the project but could help protect our residential streets from encroachment.

- 1- Maintain the current configuration of the two lanes continuing directly to and from the Marina Blvd. in combination with a dedicated off-ramp to the Presidio. We understand that this scenario requires marginally "more concrete", but the traffic delays coming into the City will be unbearable without this solution.

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2- Only if #1 is truly an impossible solution, then a no-intersection exit ramp to Marina Blvd. should be installed. Only if that is truly impossible should consideration be given to minimizing the number of intersections along the (eastbound) Marina Blvd. off ramp. This might be accomplished by:

- a- Selection of the Circle Drive option over the Diamond option for west-bound Presidio access. As we recognize the required removal of the YMCA swimming pool with this option, we would need to know what plans would be in place to rebuild it and where.
- b- Eliminating the direct Gorgas / Girard 'submerged' intersection between the Gorgas east-bound off ramp and Marina Blvd. by making the Doyle Drive access to Gorgas Avenue use Birmingham Road for a connector as proposed in one of Michael Painter's design scenarios. With these two adaptations (a and b), both of the additional intersections shown on the current plan could be avoided.
- c- To further offset the additional delays introduced to the use of Marina Blvd. and the congestion on Lombard, the stop signs on Marina Blvd must be replaced with signalized lights. *The recommendation of the Transportation Authority as part of the Doyle Drive project would be a big help in facilitating this change.*

The CHA will not support an alternative based on a, b and c without a further study being done demonstrating that it would, in fact, equalize the Marina Blvd./Richardson/Lombard traffic to their present ratio.

3- The single lane entrance to Girard/Doyle from Marina Blvd. must be expanded back to two lanes to allow timed signalization of Marina Blvd. and remove a potential westbound bottleneck. We understand that the reason for shrinking it to single lane was to avoid impacting the historic warehouses along Mason. We feel that keeping the entrance in the same position, but shrinking or eliminating the shown wide median for the short distance passing the warehouses, could have the same effect and still allow two lanes of traffic. The latest Painter drawings show that there is sufficient space to accommodate this change.

4- We recognize that the straight across intersection resulting from an off ramp to Birmingham Rd. could potentially encourage the previously mentioned short cut through Gorgas and onto Lyon Street. We feel that this Gorgas to Lyon connector must be removed. As part of the Presidio road system rather than the Doyle Drive plan, we realize that this is not part of your direct purview, but a direct specification in your plan would go a long way towards accomplishing its' removal.

We agree that the current design is an aesthetic improvement over the rebuild and widen (Alternative #2). However, major work must be done to ensure distribution of traffic equal to the present Marina Blvd. and Richardson/Lombard ratios, so as to thereby avoid grave congestion and resulting infiltration to City residential areas. Although the current traffic models claim only a modest projected change in Lombard traffic, several projects

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already in the planning stage within the City could seriously alter the assumed traffic flow from those modeled. This could be severely impacted by the reduced emphasis the current plan places on Marina ingress and egress.

We feel that the Parkway alternative is on the right track, but the changes we have mentioned would help even out the traffic imbalance which we fear the current design would engender.

We again look forward to working with you in finalizing this important contribution to the future northern access to our City. If you have questions or require clarification of our suggested modifications, please feel free to contact me at 415-749-1841 (lbrooke@lmi.net) or Tony Imhof at 921-4657 (imhof3@sbcglobal.net).

Sincerely,

Lori Brooke
President, Cow Hollow Association

cc: Michela Alioto-Pier



Comments on the Doyle Drive Project DEIS/R

Reviewer: Cow Hollow Association

Reviewer's Comment Number	Response	Database ID
1	Removal of support of Alternative 5 noted.	1339
2	To analyze any potential impacts on neighborhoods, the traffic study was expanded beyond the original parameters studied in the DEIR/S. The results of this expanded analysis are presented in the FEIR/S, see the discussion under the Preferred Alternative in Section 3.2.8. No adverse impacts from this project onto the neighborhoods was indicated. In order to maintain traffic during construction, a transportation management plan will be prepared as part of final design.	1340
3	Although this short cut is not forecast to be a significant problem, the closure of this access is not precluded in Alternative 5 should the problem arise.	1341
4	All alternatives included transit elements and assumed a continuation of currently operating transit services. Bus Rapid Transit proposals were not defined or programmed during the preparation of the draft EIR. Further studies on Doyle Drive and the BRT proposals should examine potential traffic shifts as a result of the implementing of both projects.	1342
5	To analyze any potential impacts on neighborhoods, the traffic study was expanded beyond the original parameters studied in the DEIR/S. The results of this expanded analysis are presented in the FEIR/S. No adverse impacts from this project onto the neighborhoods was indicated.	1343
6	The Preferred Alternative was refined based on input received while still maintaining traffic operation LOS. The design workshops investigated many design refinements which as been incorporated into the Preferred Alternative.	1344
7	The Preferred Alternative was refined based on input received while still maintaining traffic operation LOS. The design workshops investigated many design refinements which as been incorporated into the Preferred Alternative.	1345
8	Signal timing can balance traffic flows regardless of which alternative is chosen.	1346

Cow Hollow Neighbors in Action

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San Francisco, CA 94123

415-776-3191 Fax 776-6522

Patricia Vaughley - President

Nan Haynes - Vice President

Max Delle Sedie - Secretary

Argene Glorji - Treasurer

REC'D MAR 30 2006

March 28, 2006

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

Dear Leroy L. Saage:

We have carefully reviewed you DEIS/R and find various objections resulting from the changes that will occur in our Marina/Cow Hollow neighborhood as a consequence of the Doyle Drive replacement project. We have summarized the major concerns into the following 4 bullets:

- The Marina Blvd. traffic patterns are to remain as they presently are. For City-bound traffic, the additional traffic light(s) included with Alternative 5, Circle and Diamond Options, will result in additional traffic through the local side streets. For Golden Gate Bridge-bound traffic, the Marina Blvd. access to Doyle Drive must be maintained as two full lanes.
- The Presidio exit into Girard Road/Gorgas Avenue is acceptable, if and only if, the Gorgas slip ramp into Lyon Street at Francisco Street is closed. It is foreseen that commuter traffic will utilize Lyon Street and Francisco Street as a cut-through and increase neighborhood traffic.
- Please leave Lyon Street (north of Richardson) as-is. The Circle Drive and Diamond Options are unnecessary.
- Alternative 5 is an acceptable alternate if the above concerns are implemented. Otherwise, Alternative 2, Replace and Widen, would be the preferred alternative.

DEIS/R Comments:

1. Page 2-1: Para 2.1 "Doyle Drive Project extends, on the west, from the Golden Gate Bridge Toll Plaza to Broderick Street on the east, and includes Richardson Avenue, Gorgas Avenue, and Marina Boulevard." As this paragraph defines the project's limits, the EIS fails to include a detailed analyses of the changes in traffic patterns, pollution, noise, and quality of life changes,

that would occur on the side streets as a result of the Doyle Drive Project. The side streets that have been excluded are: Lyon (west of Richardson), Francisco Street (both sides of Richardson), Baker (east and west of Richardson), Chestnut (east and west of Richardson), Lombard (west of Richardson), and Broderick at Lombard and east of Richardson.

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2. Page 2-26: Para 2.3.1 "NO MARINA ACCESS OPTION" "..... Changing traffic patterns would increase intrusion in the residential area of Cow Hollow, Pacific Heights, and the Marina by increasing local traffic between Marina Boulevard and Richardson Avenue". This alternative was specifically dropped because of the adverse effect it would have on the quoted residential areas. However, the access to Marina Blvd., as presented in Alternative 5, Presidio Parkway, produces the same effect for which this alternative was originally dropped. The circuitous route required for City-bound traffic to reach Marina Blvd. borders on the virtual elimination of east-bound traffic to Marina Blvd.

3

3. Page 2-43, para 2.4.3. Exhibit 2-29 shows an off-ramp exiting to Girard Road and Gorgas Ave. The EIS does not address the traffic volumes that would occur at the intersection of Gorgas Ave. and Francisco and Lyon Street. We object to this design because of the likelihood that Gorgas Avenue will become a way for commuters to cut-through into our local streets.

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As mitigation for the cut-through traffic, the neighborhood would accept closing the slip ramp of Gorgas Ave. at Francisco/Lyon Street and modifying it to only allow bicycle, pedestrian and emergency vehicle access.

4. Page 2-43, para 2.4.3. Exhibit 2-29, the off-ramp exiting to Girard Road and Gorgas Ave. The EIS fails to address the speed limits, traffic controls, the increased traffic volumes as well as the resulting noise, pollutants, and vibration, for the streets west of Richardson Ave and defined as: Francisco Street, Lyon Street, Chestnut St., Greenwich St., Union St., and Green St.

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What are the speed limits, pollutants, noise, vibration, and traffic counts, on the streets mentioned as a result of the off-ramp at Girard Road?

5. Page 3-91, para 3.2.9 " Temporary Impacts". ".....it is anticipated that some routes may require temporary re-routing. Sufficient notice will be given to the general public regarding new, temporary routes within the project area". The EIS identifies (Exhibit 2-36, and 2-37) which routes may require temporary closure and re-routing. Additionally, Page 3-70, identifies some traffic detours but fails to identify the effects on the local neighborhood streets in proximity to the Project.

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What are the exact alternative routes and exact temporary rerouting routes, including the local neighborhood streets? And, what are the impacts, if any, to residents along the alternative and temporary routes.

6. Page 3-173, para 3.3.5, Affected Environment. The paragraph identifies noise sensitive receptors as: Baker Street, the south side of Marina Blvd, the east side of Lyon Street (north of Lombard), Richardson Avenue, and the Palace of Fine Arts. Based on the Project scope boundary (Toll Plaza to Broderick Street), the EIS fails to identify Francisco Street, Chestnut Street, the west side of Lyon Street, and Lombard Street.

7

Utilizing CalTrans Highway Traffic Noise Prediction Model, TNM, and for each alternative, what are the expected noise levels for the mentioned, excluded, streets?

7. Page 3-175, Exhibit 3-49, Long Term Noise Measurements. The Federal Highway Administration (FHWA), 23CFR772, requires noise level measurements be made 50 feet (app. 15 metre) from source. The tabulation presented in Exhibit 3-49 is not in accordance with FHWA's measurement requirements. Therefore, any "modeled" projected noise levels are inaccurate. Additionally, the EIS fails to include noise measurements taken along the complete project's boundary, i.e. Golden Gate Toll Plaza to Broderick Street.

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What are the noise measurements at Richardson, both sides of Lyon Street, Baker Street, Francisco Street, Chestnut Street, and Lombard Street at Broderick?

8. Page 3-178, "Residences Richardson Avenue and Marina Boulevard. These areas could be exposed to noise levels above 89 dBA during construction". According to FHWA: "When construction noise impact is anticipated at a highly complex or controversial major urban project, the FHWA requires the utilization of the computerized prediction model HICNOM. FHWA Section 772.19, Construction Noise, FAPG 23 CFR 772, specifically address this issue. The EIS fails to define what mitigating or protective measure will be taken to reduce the noise level to acceptable levels. Additionally, the EIS only mentions Richardson Avenue and Marina Blvd but fails to include both sides of Lyon Street, Baker Street, Francisco Street, Chestnut Street, and Lombard Street at Broderick.

9

What are the mitigating or protective measures that will be taken to reduce noise levels to acceptable levels at Lyon Street, Baker Street, Francisco Street, Chestnut Street, and Lombard Street at Broderick?

9. Page 3-190, "Avoidance, Minimization, and Mitigation Measures". Further prediction of noise impacts is unnecessary since they have already been identified to exceed the FHWA or NAC requirements (Exhibit 3-49, 3-50, 3-53, 3-54, and 3-55). Each alternative requires mitigation/minimization effort. Therefore, any postponement until the preferred alternative is selected is unnecessary. For the residents of the impacted areas, Marina Blvd, Richardson Ave., Lyon Street, Baker Street, Francisco Street, Chestnut Street, and Lombard Street at Broderick, the only viable and acceptable mitigation/minimization is traffic management. Your "Traffic Management" paragraph, page 3-191, is unacceptable since the EIS only addresses vehicle speed and traffic volumes. Additional mitigation measures listed under 23 CFR 722 are: Prohibition of certain vehicle types, Time use restrictions for certain vehicle types, Modified speed limits, Exclusive land use designations, and Traffic control devices or combinations of

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these measures. FHWA (23 CFR 722) requires compliance when the criteria are approached or exceeded. Additionally, compliance is a prerequisite for the granting of Federal-aid highway funds for construction and re-construction of a highway.

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How do you propose to implement the traffic management required to mitigate the noise impacts for Marina Blvd, Richardson Ave., Lyon Street, Baker Street, Francisco Street, Chestnut Street, and Lombard Street at Broderick?

10. Page 3-195, Alternative Paving Materials. "Using alternative paving materials such as open-graded or rubberized asphaltic concrete is another noise reducing measure." According to FHWA HIGHWAY TRAFFIC NOISE ANALYSIS AND ABATEMENT POLICY AND GUIDANCE, Page 38 Paragraph F: "it is very difficult to forecast pavement surface condition into the future. Unless definite knowledge is available on the pavement type and condition and its noise generating characteristics, no adjustments should be made for pavement type in the prediction of highway traffic noise levels. Studies have shown open-graded asphalt pavement can initially produce a benefit of 2-4 dBA reduction in noise levels. However, within a short time period (approximately 6-12 months), any noise reduction benefit is lost when the voids fill up and the aggregate becomes polished. The use of specific pavement types or surface textures must not be considered as a noise abatement measure." (emphasis added)

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What alternative noise reduction methods will be provided?

11. The northbound ramp from Marina Blvd. is limited to a single lane. Since Marina Blvd. is a two-lane street, the ramp towards the GG Bridge should not be constricted, and also be two lanes.

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12. The DEIS/R makes no reference to the replacement of the portion of Veteran's Blvd. from the Doyle off-ramp to the tunnel. Why not? This portion of roadway is of the same vintage as the rest of Doyle Drive and subject to the same replacement reasons outlined for Doyle Drive (Paragraph S.2), and 1.3.2, Project Need.

13

13. Page 5-2. Para. 5.1.2, Federal Highway Administration. Your references to the FHWA memorandum and position papers are outdated. Your analyses for indirect and cumulative impacts must be based on Executive Order 13274, Indirect and Cumulative Impacts, Work Group, Draft Baseline Report, dated March 15, 2005.

14

14. Page 3-191. Para. "Traffic Management". Your statement: "...implementing traffic management measures on Doyle Drive would not be a reasonable noise abatement measure because it would interfere with the purpose of the project." is irresponsible. When "noise" issues are either foreseen or exist, mitigation is mandatory whether it be through traffic management or any other means. The FHWA requires that measures be taken even though there is no actual reduction in noise levels. Approved reduction methods can be as simple as landscaping; where the "noise" reduction is only perceived and not actually diminished. If a noise impact is identified, the abatement measures listed in Sec. 772.13(c) must be considered.

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Additionally:

(d) When noise abatement measures are being considered, every reasonable effort shall be made to obtain substantial noise reductions.

(e) Before adoption of a final environmental impact statement or finding of no significant impact, the highway agency shall identify:

(1) Noise abatement measures which are reasonable and feasible and which are likely to be incorporated in the project, and

(2) Noise impacts for which no apparent solution is available.

(f) The views of the impacted residents will be a major consideration in reaching a decision on the reasonableness of abatement measures to be provided. (emphasis added)

(g) The plans and specifications will not be approved by FHWA unless those noise abatement measures which are reasonable and feasible are incorporated into the plans and specifications to reduce or eliminate the noise impact on existing activities, developed lands, or undeveloped lands for which development is planned, designed, and programmed.

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Cont



Comments on the Doyle Drive Project DEIS/R

Reviewer: Cow Hollow Neighbors in Action

Reviewer's Comment Number	Response	Database ID
1	Comments noted.	1499
2	To analyze any potential impacts on neighborhoods, the traffic study was expanded beyond the original parameters studied in the DEIR/S. The results of this expanded analysis are presented under the discussion of the Preferred Alternative in Section 3.2.8 of FEIR/S. Impacts associated with Noise (Section 3.3.5) and Air Quality (Section 3.3.4) are available in Chapter 3 of the FEIS/R. No adverse impacts from this project onto the neighborhoods was indicated.	1500
3	To analyze any potential impacts on neighborhoods, the traffic study was expanded beyond the original parameters studied in the DEIR/S. The results of this expanded analysis are presented in the FEIR/S. No adverse impacts from this project onto the neighborhoods was indicated.	1501
4	To analyze any potential impacts on neighborhoods, the traffic study was expanded beyond the original parameters studied in the DEIR/S. The results of this expanded analysis are presented in the FEIR/S. No adverse impacts from this project onto the neighborhoods was indicated. In design workshops, restricting this facility has been discussed, however the extent of the restriction will not be explored until final project design.	1502
5	The project does not propose any changes to local neighborhood streets as no project impacts are identified. To analyze any potential impacts on neighborhoods, the traffic study was expanded beyond the original parameters studied in the DEIR/S. The results of this expanded analysis are presented under the discussion of the Preferred Alternative in Section 3.2.8 of the FEIR/S. No adverse impacts from this project onto the neighborhoods was indicated.	1503
6	The exact re-routing of traffic will not be determined until design is complete. The transportation management plan (TMP) will be finalized prior to construction to mitigate potential adverse impacts and to provide a public outreach element to announce changes in traffic routes. A draft TMP is included in Appendix K of the FEIS/R.	1504
7	The limits of construction for the project have been defined as from Merchant Road to the intersection of Richardson Avenue/Francisco Street and Marina Boulevard/Lyon Street, as noted in the December 2004 Noise Study. Areas outside of these limits are not expected to be impacted by construction activities. Operational aspects of the existing streets in this area will continue as they have prior to the project. It appears that the eastern extent to Broderick is only in the vicinity of Marina Blvd and not at the Richardson/Broderick intersection. To analyze any potential impacts on neighborhoods, the traffic study was expanded beyond the original parameters studied in the DEIR/S. The traffic study data was used to conduct additional noise analysis. No adverse impacts from this project onto the neighborhoods was indicated. See Section 3.3.5 of the FEIS/R for additional information about the noise study addendum.	1505



Comments on the Doyle Drive Project DEIS/R

Reviewer: Cow Hollow Neighbors in Action

Reviewer's Comment Number	Response	Database ID
8	<p>Temporary Noise Impacts in Section 3.3.5 of the FEIS/R was expanded to include construction noise reduction options that are considered reasonable and feasible. Those measures are currently listed in Section 8.1.4 of the Noise and Vibration Study of December 2004 and includes numerous methods of noise control that can be employed. The statement that FHWA requires the use of HICNOM is not correct. FHWA does not require the use of HICNOM or any construction noise model - it merely provides them for the use of the highway agency. Specific construction noise reduction methods to be used by the Contractor will be defined in the design plans and included in the construction documents. Since the area beyond the intersection of Richardson Avenue and Lyon Street will not be within the active construction zone, no special noise controls are anticipated for those areas.</p>	1506
10	<p>Section 3.3.5 of the FEIS was expanded to include a discussion of all of the traffic management options that were considered. While it is true that a number of abatement options are available in terms of traffic management, the various methods of control suggested by the reviewer have been explored and found to be ineffective for this project. Further prediction of noise impacts is not warranted at this time as the project will not impact the areas in question unless a major design change occurs. For the preferred alternative a more detailed assessment of noise control options was outlined, however the final selection of noise abatement options will not occur until final design. This will follow the completion of an intensive public involvement effort to identify the desires of the impacted property owners in the vicinity. The reviewer is correct that only traffic management efforts could provide any relief to the traffic noise generated. However, due to the nature of the roadway, traffic patterns, and limited physical options, no reasonable control methods were identified. As noted by the reviewer, FHWA requires "Examination and evaluation of alternative noise abatement measures for reducing or eliminating the noise impacts." (23CFR Part 772.9 (b) (5)). FHWA further states that "If a noise impact is identified, the abatement measures listed in Sec. 772.13(c) of this chapter must be considered." Consideration of abatement measures listed in this section have been considered, including the use of traffic management measures. However, as note above, the use of traffic management measures was determined not to be reasonable and feasible for the areas of concern. Therefore, further consideration of noise abatement in the form of traffic management is not warranted at this time.</p>	1507
11	<p>The statement by the reviewer that FHWA does not currently allow the use of paving materials as a "noise reduction option" in the prediction of future traffic noise levels is correct. This does not mean that the application of a quieter pavement surface cannot be used as a means to reduce traffic noise. It simply means that you cannot use this option as a way to predict lower future traffic noise levels. The application of a quiet pavement in states like Arizona have shown a 4 dBA or more reduction in traffic noise levels for a period of several years. The long term benefit is still unknown but at least an initial benefit can be realized. Therefore the application of a quiet pavement surface will continue to be considered as an abatement option. As noted in this section, noise barriers, absorptive tunnel lining, and retrofitting windows are three additional abatement options being seriously considered. Commitments to further assess each of these options was established in the FEIS for the preferred alternative as appropriate. Final details on the actual abatement options will be determined during the design phase of the project in concert with the impacted property owners.</p>	1508
12	<p>Based on traffic analysis, only one lane is needed</p>	1509



Comments on the Doyle Drive Project DEIS/R

Reviewer: Cow Hollow Neighbors in Action

Reviewer's Comment Number	Response	Database ID
13	That element was outside the scope of the project. However, the project team is working with Caltrans to address this issue. A memo regarding this issue has been provided. Structures on Route 1 have been retrofitted and have an adequate sufficiency rating.	1510
14	FHWA and Caltrans instructed the team to use this reference which is included in the EIS/R. The current cumulative impact analysis meets statutory and regulatory requirements.	1511
15	FHWA does not require the use of abatement measures that provide no perceptible noise reduction. This section of the FEIS was expanded to include a more detailed discussion of all of the traffic management options that were considered. The use of landscaping, particularly in the areas of impact along Lyon Street and similar residential areas on the eastern end of the project is not possible since there is no space to plant or maintain vegetation that would screen the traffic from view. The statement regarding FHWA requirements about abatement being considered is correctly stated. However, the provision of noise abatement is left up to the lead agency after it assesses the costs and benefits of such abatement and determines that abatement effort is reasonable and feasible for the areas of concern. This is, unfortunately, one of those locations where unavoidable impacts in the form of traffic noise levels that approach or exceed the FHWA Noise Abatement Criteria for residential land use. The traffic noise levels are actually predicted to be slightly lower with the build alternative than with the no-build option, indicating that the overall noise impact will be negligible. Once again, FHWA does not require mitigation - it requires the consideration of abatement that is reasonable and feasible. If abatement is considered reasonable and feasible, then mitigation is required. Unfortunately, this is a location where noise abatement is not considered reasonable and feasible following FHWA and Caltrans requirements.	1512



March 31, 2006

Lee Saage, PE, Project Manager
c/o San Francisco County Transportation Authority
100 Van Ness Avenue, 26th Floor
San Francisco, CA 94102

Re: Doyle Drive Project
Draft Environmental Impact Statement/Report

Dear Mr. Saage:

The Exploratorium welcomes the opportunity to provide comments on the Draft Environmental Impact Statement/Report for the Doyle Drive Project. We fully support your efforts to replace the existing Doyle Drive structure and other proposed improvements to traffic and circulation in the general vicinity. We commend the Doyle Drive team for the progress to date and development of the alternatives. Our general comments on the three alternatives are as follows:

- Alternative 1 – No-Build - This is not an acceptable alternative
- Alternative 2 – Replace and Widen – This alternative has the lesser impact on the Palace of Fine Arts area of the two rebuild alternatives, but does little to mitigate many of the unfortunate features of Doyle Drive cutting through the Presidio
- Alternative 5 – Presidio Parkway – This alternative has the greater impact on the Palace of Fine Arts area but has numerous beneficial aspects that have resulted in our recommendation of this alternative as the preferred approach.

Although the Exploratorium has plans in progress to relocate from the Palace of Fine Arts to another location in the San Francisco, it is possible that our relocation could occur after the construction of the Doyle Drive Project is scheduled to begin. As a result, our comments are focused on the impacts of the complex construction process on our continuing operations in the Palace of Fine Arts and in the Presidio buildings we lease along Mason Street.

Construction Period

Our comments on the construction impacts that we have been able to determine from the extensive DEIS/R documents are as follows:

General Comments on Construction

- Access to the Palace of Fine Arts area for visitors and staff will be seriously impacted, including automobiles, pedestrians, bicyclists, school buses, as well as for service, deliveries and emergency vehicles. 2
- Wayfinding will be complex and difficult and sufficient funds must be included in the Doyle Drive Project budget for use-specific signage and other mitigation measures, such as public information outreach. 3
- School field trips are a major aspect of Exploratorium programs and a program for management of bus unloading and loading for this purpose will need further development in the Doyle Drive planning. Shuttle busing from the Presidio Parade Ground may not be practical for school field trips. 4
- Private automobile access during construction will be very problematic. Parking in the Presidio with shuttle busing to the Palace may be possible but, will be a wayfinding nightmare for those unfamiliar with the City and the Presidio. Is funding for shuttle buses in the Doyle Drive Project budget? 5
- Public transit will be impacted and the reduced service, service delays and rerouted service routes will add significantly to our access problems. 6
- The Presidio Parade Grounds at the Main Post are mentioned frequently as a location for parking, bus staging and shuttle service. Is this planning in conflict with Presidio Trust planning for the Main Post that has been in progress for several years? 7
- Construction conditions will, in all likelihood, create a tendency for Palace visitors to park on the neighboring streets, creating a further strain on neighborhood relations. 8

Replace and Widen Alternative Construction

In addition to the above, this alternative's construction detour option will not only impact the LAIR parking lot but will also terminate use of Presidio Building 1182 which is used by a number of employees as listed in the DEIS/R, but also provides active material storage, shipping and receiving functions. 9

Parkway Alternative Construction

In addition to the above, this alternative's construction phase will take the LAIR parking lot out of use completely. 10

Schedule for Construction

There does not appear to be a detailed construction schedule in the DEIS/R. We look forward to understanding the detailed timelines better and how we may plan our activities in response to the construction impacts. 11

Palace Drive Construction

It is unclear whether the improvements to Palace Drive are in the scope of the Doyle Drive Project and in the Project budget – and when in the construction 12

schedule this work would be scheduled to occur. Is additional information available on this subject?

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Although we understand and would expect that many of the neighboring institutions will be inconvenienced during construction by such a large project, every effort must be made to mitigate, to the extent possible, the operational and environmental impacts and sufficient funds budgeted to do so. The Transportation Management Plan to be developed will be a key ingredient in the planning and we look forward to participating in this process.

Permanent Planning

Exploratorium management is projecting that we will relocate prior to the end of the Doyle Drive construction period, however, we offer the following comments on the permanent plans in the DEIS/R as they may effect the Palace of Fine Arts complex:

Replace and Widen Alternative

This alternative, when completed, does not appear to have a major impact on the LAIR parking lot, Palace Drive or the Palace Drive/Lyon Street alignments.

Parkway Alternative

This alternative has the greater potential impact of the final two build alternatives. Recognizing that there is additional planning to be done in the area of the Palace of Fine Arts, we believe the significant impacts on this area, regardless of the tenant, are as follows:

- The proposed underground parking configuration seems very awkward and inefficient.
- Access to the underground parking as currently shown is remote, non-intuitive and the wayfinding to and from the parking is likely to be problematic.
- This parking scheme will be extraordinarily costly per space. Is funding for this underground parking in the Doyle Drive Project budget?
- The two alternative configurations shown for Palace Drive do not seem to be integral with the Diamond or Circle Drive options and appear to be separate Palace Drive alternatives.
- Either one-way plan for Palace Drive has certain advantages, but will create challenges in the management of automobile and bus circulation.
- The separation of the east end of Palace Drive from Lyon Street will be a major improvement and welcomed by the neighbors.
- Automobile drivers will be able to drop off passengers at the existing north entrance or a new central entrance, but would then have to find an auto entry to the underground parking. The closest parking entrance shown is from Girard Road and would require a left turn across the Girard traffic from Doyle Drive, assuming a left turn at that location is feasible. Pedestrians from and to the underground parking will need strategically placed access/egress locations and clear wayfinding signage to navigate the complex plan.
- With the Palace Drive plan shown on the Circle Drive Option, buses from the north can enter and depart from the Lyon/Marina Drive location, while all buses from the City apparently must return to Richardson through the Presidio via Gorgas Avenue.

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- With the Palace Drive plan shown on the Diamond Option, buses from the north would travel through the Presidio along Gorgas to reach Palace Drive from Richardson, while buses from the City must return to Richardson through the Presidio via Gorgas Avenue. In this option, it appears that all buses would travel through the Presidio arriving or departing – probably not desirable from the Presidio perspective. 17
- The Pedestrian Overcrossing from the Palace to Crissey Field shown on both options seems somewhat implausible. Is this pedestrian bridge included in the Doyle Drive Project budget? 18
- The replacement of the LAIR parking lot with underground parking and the narrowing of Palace Drive will present an opportunity for extensive landscaping improvements to the west of the Palace building. Hopefully, the Doyle Drive Project, the Recreation and Park Department and the Presidio will be able to meet the challenge of funding and executing these improvements. 19

These comments are based on our interpretation of the DEIS/R documents. If there are areas where we may have misunderstood any of the material, we look forward to any clarifications that may be warranted in your responses in the DEIS/R process.

We certainly appreciate the tremendous amount of effort that has made to address this difficult and important undertaking and the opportunity to comment on the DEIS/R.

Best wishes for a successful conclusion to the EIR process and timely replacement of the existing Doyle Drive structures.

Sincerely yours,

The Exploratorium



Fred L. Foote
Project Director

Cc: Virginia Carroll Rubin, Acting Executive Director
Christina Orth, Chief of Staff



Comments on the Doyle Drive Project DEIS/R

Reviewer: Exploratorium

Reviewer's Comment Number	Response	Database ID
1	Support of Alternative 5 noted.	1273
2	The project team will continue to coordinate with the Recreation and Parks Department to ensure that access to the Palace of Fine Arts remains open during the construction period. The Preferred Alternative will maintain Palace Drive as a two-way road and incorporates the modifications proposed by SFRPD where Palace Drive connects to Lyon Street therefore access to the Palace of Fine Arts will not be hindered.	1274
3	The elements mentioned in the comment may be part of the Traffic Management Plan(TMP) used during construction.	1275
4	Details pertaining to the proposed replacement parking at the Parade Grounds during construction would be developed in coordination with the Presidio Trust.	1276
5	Any approved mitigation addressing project-related parking impacts would be considered as project costs. Details would be developed at a later stage of the project.	1277
6	No alternative assumes modifications in the vicinity of the Exploratorium. Alternative 5 transit stops will be closer to the Exploratorium entrance.	1278
7	The PTMP does call for the eventual "greening" of the Parade Grounds but currently the area is used for parking. It is a matter of timing and whether the greening would occur before or after the construction of Doyle Drive. With no definite timeline for the greening of the Parade Ground, it is anticipated that the area would still be available for parking during the construction of Doyle Drive.	1279
8	The proposed replacement parking at the Parade Grounds augmented with the existing shuttle service should address the identified parking impacts during construction. Parking will be coordinated with the Presidio Trust.	1280
9	In July 2006, Alternative 5 with the Diamond interchange option was selected as the Preferred Alternative therefore Building 1182 will remain intact.	1281
10	The existing Letterman Digital Arts Center (LDAC) now occupies the former LAIR facility and parking lot. Parking associated with LDAC will not be impacted by project construction.	1282
11	The detailed construction schedule will be developed as part of final design. The preliminary construction staging timeline is discussed in Section 2.9.1.	1283
12	The project will continue to coordinate with and accommodate the proposed plans of DRP. Improvements needed for the project are included in the estimate	1284



Comments on the Doyle Drive Project DEIS/R

Reviewer: Exploratorium

Reviewer's Comment Number	Response	Database ID
13	The underground parking structure was eliminated from this project and is not part of the Preferred Alternative. The project is coordinating with the Trust and DPR to maintain the necessary parking. Funds for replacement parking are included in the estimate.	1285
14	Comment noted.	1286
15	Comment noted. The underground parking structure was eliminated from the project and is not part of the Preferred Alternative.	1287
16	The Circle Drive Option was not selected as part of the Preferred Alternative.	1288
17	Comment noted.	1289
18	The pedestrian connection indicated on the drawings is an at-grade path.	1290
19	The project will continue to coordinate with and accommodate the proposed plans of DPR. Improvements needed for the project are included in the estimate.	1291



REC'D MAR 31 2006

March 30, 2006

Mr. Leroy L. Saage
100 Van Ness Ave. 26th Floor
San Francisco CA 94102

Re: Comments of the Fort Point and Presidio Historical Association
on the DEIS/R for Doyle Drive.

Dear Mr. Saage:

The Fort Point and Presidio Historical Association has for over fifty years supported bringing Presidio history to the public. We support the replacement of the current Doyle Drive roadway as necessary for public safety. However, removal of the existing historic Doyle Drive and the construction of a new roadway twice as wide as the existing roadway, will have a negative effect on the Presidio as a National Park and as a National Historic Landmark District (NHL). The design for the new roadway should avoid or minimize the effect on historic structures and features. The project should mitigate the effect of the new wider roadway by contributing to the presentation of the history represented in this NHL in a suitable venue such as a history center or museum, as well as at locations throughout the District at sites associated with historic events, units or people.

We prefer the Presidio Parkway (Alternative 5) as the design approach for this project, provided the design evolves in a manner which follows the direction indicated in Michael Painter's design presented in a meeting in your offices on Feb.22,2006. At the easterly end of the roadway the "Diamond interchange" should be selected over the "Circle Drive" option since it avoids the destruction of the historic Presidio Pool (Building 1151). We note that the project must be designed to avoid negatively effecting buildings which contribute to the NHL. Since an alternative to the removal of the pool exists it must be selected.

We urge the acceleration of the section 106 process and the development of an MOA between parties. We further suggest that the concept design process be accelerated. A design process for the landscape opportunities opened up by the creation of tunnels should also be integrated into the design approach so that the visitor experience is enhanced. This should include the area above the tunnel at the cemetery and the adjacent batteries Slaughter and Blaney, as well as the area between the project and Mason Street. These design processes should parallel the project design process.


Mr. Leroy L. Saage
March 30, 2006
Page Two

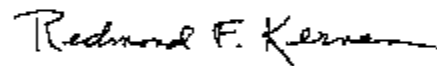
We look forward to continuing to work with you and your design team to bring about a truly magnificent project that is not only safe but respects the National Park and National Historic Landmark District context. We believe that the effect of this new and wider roadway can be mitigated by preserving and presenting this historic legacy to the public.

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Further detailed comments are included as Attachment A to this letter.

Sincerely,


Gary Widman
President


Redmond F. Kernan, III
Chairman of the Board

cc: Congresswoman Nancy Pelosi
Craig Middleton, Executive Director, Presidio Trust
Brian O'Neill, General Superintendent, GGNRA
Ric Borjes, Federal Preservation Officer, Presidio Trust
Michael Boland
Rick Foster, GGNRA
Craig Kenkel, Chief, Cultural Resources & Museum Management, GGNRA
Michael Butler, National Trust for Historic Preservation



Attachment A

1. A slip ramp should not be constructed at Merchant Road unless absolutely necessary for safety reasons. It intrudes on the landscape and would cause the removal of existing residential structures. 6
2. The "hook ramp" from Park Presidio Blvd to Doyle Drive is preferable to the "loop ramp" as it would have less impact on the area and landscape. While nearer the historic stables we believe it is sufficiently removed so as not to cause a significant negative impact. 7
3. The out and cover tunnel at the Cemetery should be shortened from what was originally shown. Its purpose we believe is to reconnect the Batteries to the upper Presidio which are now cut off by the at surface roadway. A much shorter tunnel could perform the function of providing physical and visual access by the public to the Batteries and bluff area. 8
4. The roadway as it emerges from the Cemetery tunnel should have the southerly portion (inbound to the City) raised so as to do the least alteration to the existing bluff. This will also have the effect of lessening the need for massive retaining walls in that area. Any walls that are required should be so treated so as to resemble a natural bluff. 9
5. The area to the north of the Main Parade Ground where it is proposed to build a structure over the roadway and fill over it thereby creating a covered tunnel is the most challenging and complex area. Halleck St. and adjacent or nearby structures as well as historic bluff features are negatively impacted by this design approach. This includes buildings 201, 204, and 228. The purpose of the fill over the roadway seems to be to create an assumed aesthetic treatment over the roadway. As presented the space over the roadway seems contrived, sterile, and not well thought through. The damage done to the historic context does not seem worth the small visual benefit achieved. We suggest a shorter "tunnel" with a treatment on the north side that compliments the bluff feature and perhaps provides more useable space at the lower level. Building 201 should be retained even if it must be moved and altered to allow the roadway construction to occur. Building 228 could be raised in place to the level to compliment the grade change on Halleck St. Every effort should be made to find a suitable location to move building 204 to. The alignment of Halleck St. is reestablished but the profile is so significantly altered as to compromise the sense of place. We suggest that the roadway of Doyle Drive be lowered and that Halleck St. rise in a more gradual way with buildings on either side to keep the sense of place that exists today and recalls its role as an historic connection to the Quartermaster Wharf at the beach. 10
6. Building 230 is in the path of the new roadway as currently aligned. We suggest that it be moved to a nearby location. We do believe that it is preferable to move or alter an historic or contributing structure rather than demolish it. 11

7. Gorgas Ave. as it heads west toward the new extended Girard St. gradually lowers in elevation so that Girard St. may pass under the new Parkway overhead. This creates the need for retaining walls as high as 10 feet to retain the Gorgas St. warehouses and essentially cuts them off from their frontage road (Gorgas). We believe the condition as shown is unacceptable. The further design of the area should explore ways to mitigate this condition. The off ramp to Girard could be moved to the south to align with Birmingham or Thornton rather than Girard. Even moving it slightly to the south provides an opportunity to raise the intersection and lower the grade differential. Further the entire Parkway could be raised so as not to depress Girard as much as it is. Just maintaining the Gorgas St. warehouses is not enough. If the access and context are so altered that the historic sense is destroyed they become isolated and lacking in any ability to contribute the NHLD. This can and should be avoided. 12
8. The use of sound walls to mitigate the effect of highway noise should be avoided in the Presidio as they create an unwanted visual intrusion. Any diminution of views would be contrary to the objectives of the Presidio as a National Park and would certainly not be consistent with the NLHD. In a similar vein the use of fencing and in particular, cyclone fencing, should be avoided. Instead natural barriers of height differentials, water features and landscaping should be employed. 13
9. Careful consideration should be given to appropriate signage, lighting, and fixtures that bespeak a Parkway through a very special place. Traffic calming measures are very important and should be used as much as possible. They will do much to enhance safety and enjoyment. 14



Comments on the Doyle Drive Project DEIS/R

Reviewer: Fort Point and Presidio Historical Association

Reviewer's Comment Number	Response	Database ID
1	This comment is addressed as part of the Programmatic Agreement (PA) and treatment plans which are summarized in the FEIS/R under Avoidance, Minimization and/or Mitigation Measures in Section 3.2.11. A discussion of Context Sensitive Design is provided in Section 2.2.3.	1320
2	Preference for Alternative 5 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.	1321
3	Agreed. Coordination with the impacted parties has been an important element of this project. As stated in the Avoidance, Minimization and/or Mitigation Measures of Section 3.2.11, coordination and development of the PA has involved numerous groups. The PA is included in Appendix I of the FEIS/R.	1322
4	Details regarding the final design of the roadway and landscaping will be developed in the final design process. Final landscape decisions would be made in coordination with the Presidio Trust and VMP to ensure overall integration with the Presidio.	1323
5	Coordination will continue throughout this project.	1324
6	Opposition to Merchant Road Slip Ramp noted. This Ramp was not included in the Preferred Alternative.	1325
7	Preference for Hook Ramp noted.	1326
8	The length of the Battery tunnels are controlled by the need to preserve Lincoln Ave and the National Cemetery.	1327
9	The design workshop on 3/22/06 was held to gather input from interested parties on all aspects of the design and options under consideration. A raised southbound profile was proposed and developed as part of the alternative refinement.	1328
10	Possible design refinements to preserve cultural resources were considered at the design workshops on 3/22/06 and 4/20/06. The actual mitigations for adverse effects to cultural resources including historic buildings are addressed in the PA (see Appendix I of the FEIS/R).	1329
11	This comment is addressed as part of the PA which is included in Appendix I in the FEIS/R and treatment plans .	1330
12	The design workshops held on 3/22/06 and 4/20/06 investigated ways to preserve the historic streetscape. The profile of Girard Rd was raised to reduce the height of retaining walls and Gorgas Ave was realigned to the south to preserve the existing streetscape adjacent to the warehouses. Mitigation for adverse impacts to historic streetscapes is addressed in the PA (see Appendix I in the FEIS/R) and treatment plans.	1331



Comments on the Doyle Drive Project DEIS/R

Reviewer: Fort Point and Presidio Historical Association

Reviewer's Comment Number	Response	Database ID
13	The use of sound barrier walls within the Presidio will be considered where appropriate as noise control measures. While it is true that diminution of the views may be contrary to the objectives of the area, consideration of this form of abatement will continue into design. During the public involvement process, if the impacted property owners do not desire a noise barrier, then it will be removed from further consideration. The application of landscaping as a noise control will not be pursued since this is not an effective method of reducing traffic noise levels.	1332
14	Details regarding signage, lighting, etc. will be developed during the final design of the roadway. A discussion of context sensitive design, including traffic calming, is provided in Section 2.2.3.	1333

An Association of Former Members of
Golden Gate National Parks and Point Reyes Seashore
A D V I S O R Y C O M M I S S I O N

3260 Blume Drive, Suite 410, Richmond, CA 94806

February 28, 2006

VIA FACSIMILE (415) 522-4829

Leroy L. Saage
100 Van Ness Avenue, 26th Floor
San Francisco, CA 94102

REC'D MAR - 8 2006

Re: Doyle Drive DEIS/R Comment

Dear Sirs and Mesdames:

The group which sponsors this letter, as appointees of the US Secretary of the Interior to the Advisory Commission for the Golden Gate National Parks, began planning for the Presidio in 1973 to become a part of the National Park System, and has maintained its interest in Presidio planning for more than 30 years. The Presidio is one of the two most historic locations in the United States, and is now part of the most visited National Park in the nation.

In contemplating Doyle Drive, three points stand out:

1. Currently Doyle Drive is unsafe, and ugly, and ought to be replaced.
2. Before replacing Doyle Drive, great care must be paid to a design that minimizes the effect on National Park Service land and assets.
3. While we are at it, can we do a better job for the neighbors, and for visitors to the Park.

The goal of Michael Painter's Presidio Parkway is to make this necessary roadway much better. Better for drivers, better for park users and visitors, and better for the Presidio's neighbors.

The Presidio Parkway (Alternate 5) is the only alternative which meets the objectives of the Project. Alternative 2, taller and twice as wide as what we now have, insures that increasing numbers of people driving to work, live or play in the national park, will be forced to use neighborhood streets, as they do today.

We support the hook ramp option at the Highway 1 interchange.

Re: Doyle Drive
February 28, 2006
Page 2.

We do not support the slip ramp to the bridge parking lot which, for marginal weaving improvements, adds roadway width at the Project's widest point, removes residences and trees, and adds over \$10 million in cost.

2

We have noted the legitimate concerns of some historic groups about impacts of the Main Post tunnel on the bluff edge and Halleck Street, which are historic landscape elements. The tunnel cap will mimic the bluff's slope, which is its defining character, while reuniting the Main Post and Crissy Field for the first time in 70 years. Where today from the Main Post one looks at trucks roaring by, instead we will be looking at the bay and not hear the traffic. The Parkway also restores the historic alignment of Halleck Street.

Finally, the Parkway needs modern traffic management features, including video monitoring, as called for in the Doyle Drive Intermodal Study. They will also increase the bridge's security.

3

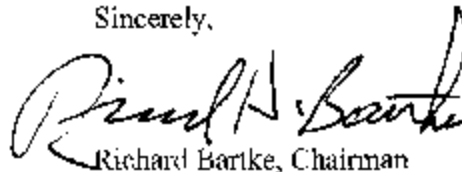
Our heartfelt thanks go to Michael Painter, who worked for 15 years, often pro bono, to bring to fruition a design which all of us can embrace.

We strongly support Michael Painter's Presidio Parkway as the preferred alternative, with context sensitive refinements that further improve the EIS designs.

4

Thank you for your anticipated attention to the above.

Sincerely,



Richard Bartke, Chairman

Richard Bartke, *Chair* - Amy Meyer, *Vice Chair*, Michael Alexander - Susan Giacomini Allan
Gordon Bennett - Betsey Cutler - Paul A. Jones - Redmond Kernan - Yvonne Lee - Doug Nadeau
Trent Orr - Lennie Roberts - Dennis Rodoni - Fred Rodriguez - Doug Siden - Edgar Wayburn



Comments on the Doyle Drive Project DEIS/R

Reviewer: GGNP & Pt Reyes Seashore Advisory Commission

Reviewer's Comment Number	Response	Database ID
1	Preference for the Hook Ramp option noted.	1227
2	Opposition to the Merchant Road Slip Ramp option noted.	1228
3	The following text was added to the FEIS/R (see Section 2.3.4): Intelligent Transportation Systems (ITS) - Where possible, ITS elements will be included with the project to meet the ITS requirements of Caltrans. ITS elements may include loop detectors, close circuit cameras, and changeable message signs. ITS elements will be clarified in Final Design and may be tied to the management of the tunnels.	1229
4	Preference for Alternative 5 noted.	1230



March 29, 2006

REC'D MAR 30 2006

Mr. Leroy L. Saage, PE
c/o San Francisco County Transportation Authority
100 Van Ness Avenue, 26th floor
San Francisco, CA 94102

Re: Doyle Drive DEIS/R Comments

Dear Mr. Saage:

The Golden Gate National Parks Conservancy is taking this opportunity to provide formal comments in regard to the Doyle Drive DEIS/DEIR. These comments focus on four matters: one, the choice of a "preferred alternative"; two, specific comments on the DEIS/R; three, access to Crissy Field during Doyle Drive construction; and four, our significant concerns regarding the impacts of Doyle Drive project construction upon the Crissy Field Center, and the absence of sufficient examination of those impacts in the Draft document.

In order to properly frame our comments on the DEIS/R, we will provide a brief background on the Parks Conservancy, and on the nature of the activities and operation of Crissy Field and Crissy Field Center.

Background

A. Golden Gate National Parks Conservancy

The Golden Gate National Parks Conservancy ("Conservancy") is the non-profit membership organization created in 1981 to:

- Preserve the Golden Gate National Parks
- Enhance the experiences of park visitors
- Build a community dedicated to conserving the parks for the future

The Parks Conservancy is a cooperating association authorized by Congress to support and assist the National Park Service in park improvement, research, interpretation, and conservation programs. The Conservancy's work is accomplished through annual membership dues, generous contributions from individual, corporate, and foundation sponsors, as well as income earned through a variety of Conservancy-operated activities, such as interpretive tours and sales of park-related interpretive materials.

Since 1981, the Conservancy has provided the Golden Gate National Recreation Area with more than \$90 million in assistance, including nearly \$5 million in 2005. The Conservancy has long been recognized as one of the most effective park partners in the country. Beginning in 2005, our partnership with the Golden Gate National Recreation Area (GGNRA) was augmented by a new working partnership with the Presidio Trust.

B. Crissy Field

The Parks Conservancy raised more than \$34 million to restore Crissy Field (and the Crissy Field Center), which included the largest single cash gift in the history of the National Park Service. Crissy Field – 100 acres of extraordinary shoreline, which had been under military jurisdiction for more than 200 years – was dedicated in May 2001, following a fund-raising campaign by the Conservancy that brought in more than 2,400 donations.

The removal of more than 70 acres of asphalt and concrete and its replacement with a 20-acre tidal marsh, plantings of native vegetation, and a natural shoreline, have transformed 100 acres from a harsh, unfriendly, contaminated landscape to one enjoyed by hundreds of thousands of walkers, bikers, sailboarders, and bird watchers. Crissy Field extends from the Warming Hut (a café and shop) at the west end, to the Mason Street entrance at the east end, and park visitors access the entire area by foot, bicycle, automobile, and public bus service.

C. Crissy Field Center

As part of the Crissy Field project, the Conservancy created the Crissy Field Center, funded through private donations totaling \$7 million. Presidio Building No. 603, which is adjacent to the tidal marsh, was converted to operate as the hub of the National Park Service (Golden Gate) community and education programs to serve urban youth who have traditionally had little or no access to National Parks. The Center has 15 on-site staff members, a fully equipped science lab, a large art room, a computer lab with 16 computers, a 100-person capacity gathering room, a resource library, community kitchen, a bookstore, a café and an outdoor orientation area.

The Conservancy operates the Crissy Field Center in partnership with the National Park Service and provides most of the \$1 million annual operating budget of the Center. The Center, now in its fifth year of operation, served more than 62,000 youth and adults in 2005. More than 21,000 of these visitors were school children and youth. All programs for school children include orientation in the main floor gathering room or on the front plaza, and then walking trips to Crissy Field and other park sites; many programs currently cross under Doyle Drive to access other nearby areas for the essential first-hand park experience. The 2005 use-level of 62,000 is anticipated to increase as the Center's group programs broaden and outreach to the community increases.

DEIS/R Comments

A. Doyle Drive Preferred Alternative

The Golden Gate National Parks Conservancy supports Alternative 5, the Presidio Parkway. The benefits provided by this alternative to the Presidio, the Park, and specifically, to Crissy Field and the Crissy Field Center, are well documented in the DEIS/R. Accordingly, our comments are focused upon the Presidio Parkway Alternative.

B. DEIS/R Text Comments

1. "Community Facilities" - Page 3-35. Please note that the name of the Golden Gate National Parks Association (as stated in the DEIS/R description of Crissy Field Center) has been changed to the Golden Gate National Parks Conservancy.

2. "Community Facilities" - Page 3-35. The Conservancy feels that the description of the Center seems to implicitly ascribe importance to the "small café and book store" rather than the functions of the NPS/Conservancy environmental education center. As the aforementioned 2005 attendance figures confirm, the primary use of the building is for its education activities. With respect to use, the bookstore and café are present to supplement and facilitate the educational activities.

3. "Appendix D: Cultural Resources - Potential Impacts within the APE" - Page D-9. The Conservancy believes that the matrix description set forth, indicating "No Adverse Effect" to Presidio Building No. 603 (Crissy Center) is not correct. There are only three definitions of potential impacts employed in the Appendix D discussion: one, "No Effect"; two, "No Adverse Effect"; and three, "Adverse Effect Direct (Destruction)". The Crissy Center building is not "taken" by the project, but the building would appear to be a "definitive" example of a category absent from the matrix: a building that is subject to "temporary adverse impacts".

The proximity of the Crissy Center to both the demolition (and pulverization) of the existing Low Viaduct, and construction of a replacement facility, clearly point to potential adverse effects. These potential effects would include the impact of flying debris, dust, noise, and vibrations during the demolition process, and noise and vibrations during the construction process.

C. Recreational Access to Crissy Field During Construction

The DEIS appears to address the importance of maintaining vehicle, bicycle, and pedestrian access to Crissy Field available throughout the period of Doyle Drive construction. The importance of providing adequate information on access routes,

detours and related matters, to the thousands of weekly visitors to Crissy Field is essential to not only their safety and continued enjoyment of the Park, but also to the efficiency of the Doyle Drive construction effort. The Conservancy maintains a website (www.parksconservancy.org), and is willing to work with the Doyle Drive project by providing updated access information on the website.

D. Construction Impacts Upon Crissy Field Center

The Conservancy is very concerned about the level and nature of Doyle Drive project impacts upon Crissy Field Center, and we believe that the Center will not be able to operate safely and effectively during the demolition and construction phases of the project. We believe that the impacts upon the Center should be subject to greater scrutiny than is provided in the DEIS/R. We believe that a more detailed examination of the impacts will conclude that the Center operations must be temporarily closed during a period beginning with the demolition of the existing viaduct structure and ending with the completion of the construction in the area adjacent to the Center. Accordingly, the Center should be subject to the benefits of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.

The Crissy Field Center is located immediately adjacent to the project area, approximately 100 feet from existing Low Viaduct of Doyle Drive. The south side of Crissy Center is lined with windows and is the location of all staff offices, the science laboratory, the main gathering room of the building, and the food preparation kitchen. The only loading facilities and handicap access ramp also exist on this side of the building, and the primary entrance to the Center is on the east side, fully exposed to the nearby Low Viaduct.

Our specific concerns are summarized as follows:

1. **Physical Impacts of Demolition.** During the demolition process, Building 603 will certainly be subject to substantial noise and vibration resulting from the demolition of the Low Viaduct. The potential for the Building to be the target of flying debris - from the necessary hammering of the existing structure - must be recognized. Pulverization of the (demolished) Low Viaduct on-site (page 2-60, DEIS/R) will mean a lengthened demolition period and the potential for additional impacts, principally noise and dust associated with the pulverization process.

2. **Air Quality Impacts of Demolition.** Demolition of the Low Viaduct by hammering and cutting, and the subsequent on-site pulverization and removal of the debris will result in unknown (and undocumented) potential air quality impacts upon the immediate area, including Building 603. Demolition dust and air quality are of great concern for all park visitors especially school children. We are especially alarmed by the temporary impacts description set forth in the draft EIS (Impact Overview):

“Demolition of structures may expose construction workers, park visitors and nearby workers and residents to hazardous concentrations of lead and/or asbestos from nearby buildings.”

Given the Crissy Field Center's immediate proximity to the work site, this declaration will establish a level of concern on the part of those using the Center that will certainly imperil normal operations. As a matter of liability, if the Conservancy and Park Service cannot assure visitors, and the parents of visitors, that safety and health standards are in place throughout the Doyle Drive project, then the viability of the Center as an educational operation is compromised.

9
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3. Impact of Post Exchange Building Removal. In addition to the work on the roadway itself, the Parkway Alternative calls for the removal of the Post Exchange building, which is located only a few feet from the Center. The Post Exchange building is a substantial structure and its removal will certainly have potential adverse impacts upon the Crissy Center building.

10

4. Physical Impacts of Construction. Noise, vibration, and access impediments from construction of the replacement will also pose a potential adverse impact upon Building 603. Noise and vibration will impact Crissy Center as drill rigs and pile hammers will be required (page 2-52, DEIS/R) on the site.

11

5. Impacts Upon Access and Operations. The Parkway Alternative requires that Halleck will be closed for most of the construction period. Halleck is the principal access route to and from Crissy Center. The parking area immediately south of the main entrance is used as a loading zone. Demolition and construction activities will surely impact this area and thus the Center's operations. More than 90% of the 21,000 school children attending classes at the Center arrive by school or chartered bus. Virtually all of the 330 children who attend summer camps at the Center arrive by private automobile. It is essential that roadways to and parking for the Center be reliable and completely safe. The DEIS/R does not appear to offer this assurance.

12

6. Environmental Justice. A primary mission of the Crissy Center is to provide a unique environmental education experience to new audiences from the Bay Area's diverse communities. Approximately 70% of those attending activities at the Crissy Field Center are from minority and low-income populations. Cessation of operations at the Center, for a period of time commensurate with the Doyle Drive project construction period, would deprive thousands of children and adults with this opportunity.

13

7. Café and Bookstore Revenue. The Crissy Field Center and Café offer visitor amenities and interpretive materials to Park visitors. Revenues generated are used solely in support of the Center. Impacts of the project that discourage visitation to the Center will result in diminished revenues and will adversely affect the Center's operating budget.

14

Summary

The Golden Gate National Parks Conservancy recognizes the importance of the Doyle Drive project, and appreciates the benefits that it will provide to the Presidio, the GGNRA, and to the programs and activities of the Conservancy. However, we believe that the DEUR does not adequately address the potential impacts of the Doyle Drive construction upon the Crissy Field Center and does not offer us sufficient assurances regarding the ability of the Center to operate in a safe and effective manner. We have attempted to set forth our concerns in this regard in this statement along with a number of related comments on the DEIS/R.

We appreciate your consideration of this matter.

Sincerely,



Greg Moore
Executive Director

Cc: Craig Middleton, Presidio Trust
Brian O'Neill, National Park Service



Comments on the Doyle Drive Project DEIS/R

Reviewer: Golden Gate National Parks Conservancy

Reviewer's Comment Number	Response	Database ID
1	Support for Alternative 5 noted.	1485
2	The text under Community Facilities in Section 3.2.4 was revised to reflect the new name.	1486
3	The text under Community Facilities in Section 3.2.4 was revised so the description of the Crissy Field Center as follows: "...this community environmental center conducts educational workshops and other programs for the public, including outreach to low-income and minority groups. The Center also provides a small cafe and bookstore to supplement and facilitate educational activities."	1487
4	This is a temporary impact related to use and is not covered under the definition of adverse effect. Only permanent effects are contained within the definition of adverse effects under the NHPA.	1488
5	Comment noted.	1489
6	The project team has since met with the Conservancy to discuss the potential impacts. Work will continue with them to minimize impacts during construction, however, temporary impacts are not covered under the definition of adverse impacts from the project.	1490
7	The Noise and Vibration study was revised to address minor design changes of the Preferred Alternative. If adverse impacts are anticipated during construction, appropriate measures that may reduce impacts will be discussed prior to construction.	1491
8	Based on concerns expressed by the owners of the Crissy Field Center, it has been determined that the functions of the Center will be temporarily relocated during the construction phase to a more suitable location within the Presidio. The contractor will contain flying debris as required by standard construction requirements to maintain public (and building) safety.	1492
9	The construction mitigation measures identified in the Avoidance, Minimization and/or Mitigation Measures of Section 3.3.4 are designed to minimize the impacts of dust on the nearby areas. With implementation of these mitigation measures, the impacts to neighboring areas would be below levels set forth to meet health standards and would comply with BAAQMD Regulations.	1493
10	Minimizing the impacts to adjacent buildings was considered throughout the design of the alternatives. Access to all facilities, including ADA approved access to the Crissy Field Center, would be maintained during the temporary construction period and long-term operation of Doyle Drive. Text regarding the relocation of the Crissy Field Center was added to the Avoidance, Minimization and/or Mitigation Measures of Section 3.2.7.	1494



Comments on the Doyle Drive Project DEIS/R

Reviewer: Golden Gate National Parks Conservancy

Reviewer's Comment Number	Response	Database ID
11	Section 2.8.2 of the FEIS/R states that a variety of construction equipment could be used on this project but does not state that this equipment would be used in the vicinity of Building 603. In addition, concerns expressed by the owners of the Crissy Field Center, it has been determined that the functions of the Center will be temporarily relocated during the construction phase to a more suitable location within the Presidio. While this may in fact be the case, the type of equipment to be used by the Contractor will depend upon the alternative selected and the conditions placed on construction methods as part of the contract documents. Therefore it is not accurate to say that pile drivers and other equipment will be used adjacent to Building 603. Detailed construction techniques and equipment will be selected by the Contractor based on the final design of the project.	1495
12	The construction description in the FEIS/R (Section 2.9) has been updated to reflect the selection of a Preferred Alternative which has a shorter construction period - approximately 3.5 - 4 years. During the periods when Halleck Street would be closed, alternate routes would be available to access the Crissy Field Center and Crissy Field area. Based on concerns expressed by the owners of the Crissy Field Center, it has been determined that the functions of the Center will be temporarily relocated during the construction phase to a more suitable location within the Presidio, see Avoidance, Minimization and/or Mitigation Measures of Section 3.2.7.	1496
13	Based on concerns expressed by the owners of the Crissy Field Center, it has been determined that the functions of the Center will be temporarily relocated during the construction phase to a more suitable location within the Presidio, see Avoidance, Minimization and/or Mitigation Measures of Section 3.2.7.	1497
14	Access to all facilities, including ADA approved access to the Crissy Field Center, would be maintained during the temporary construction period and long-term operation of Doyle Drive. Based on concerns expressed by the owners of the Crissy Field Center, it has been determined that the functions of the Center will be temporarily relocated during the construction phase to a more suitable location within the Presidio, see Avoidance, Minimization and/or Mitigation Measures of Section 3.2.7.	1498



FEBRUARY 6, 2006

REC'D FEB 13 2006

DEAR PLANNING COMMITTEE FOR DOYLE DRIVE EXPANSION:

MY REQUEST IS SIMPLE.

PLEASE, PLEASE KEEP THE LEXINGTON POOL OPEN DURING
CONSTRUCTION ON DOYLE DRIVE!

1 MANY OF OUR TEAM IN TRAINING FUNDRAISING PARTICIPANTS ARE
ABLE TO RECOVER FROM INJURIES AND CONTINUE THEIR
TRAINING THANKS TO THE REHABILITATING THERAPY TAKING PLACE
AT THE POOL. OUR ATHLETES ARE RAISING MONEY TO HELP CURE
CANCER AND TO PROVIDE VALUABLE PATIENT SERVICES SO WE
GREATLY APPRECIATE THE LEXINGTON POOL AS TO ALL THE SENIORS
AND CHILDREN WHO TAKE WATER EXERCISE AND SWIMMING CLASSES.

I TRULY HOPE YOU WILL RETAIN ADEQUATE, CONVENIENT AND SAFE PARKING
AT THE POOL DURING THE DATED 3-YEAR CONSTRUCTION PERIOD THUS ENSURING
ACCESS TO ALL THE GRATEFUL SWIMMERS.

Sincerely,
Ann O'Hara, TEAM MANAGER, TMSF

Fighting Blood-Related Cancers

ADIDAS

TeamLine





Comments on the Doyle Drive Project DEIS/R

Reviewer: Leukemia & Lymphoma Society Team in Training

Reviewer's Comment Number	Response	Database ID
1	In July 2006, Alternative 5 with the Diamond interchange option was selected as the Preferred Alternative therefore Building 1151 (YMCA Pool) will remain intact.	1257

Marina – Cow Hollow Neighbors and Merchants
2742 Baker Street
San Francisco, California 94123
415-776-6522
3-30-2006
HAND DELIVER and EMAIL

REC'D MAR 31 2006
11:54am

Leroy L. Saage
Project Manager, Doyle Drive DEIS/R Comment
%San Francisco Transportation Authority
100 Van Ness Avenue #26th Floor
San Francisco, Ca. 94102

RE: Doyle Drive Response DEIS/R

Dear Mr. Saage.

INTRODUCTION

Marina – Cow Hollow Neighbors and Merchants with boundaries between Union Street and Marina Blvd, Lyon Street to Van Ness Avenue support the Rebuild And Widen (Alternative 2).

While (Alternative 5) The Parkway has many attributes, it also has adverse Effects upon the following neighborhoods: Marina, Cow Hollow, and Richmond. Our Organization will support Alternative 5 if the following changes are made:

1. **The three lights entering Marina Blvd. In the Diamond and Circle Designs be changed to the current configuration.** This will eliminate what may be perceived as preferential treatment for one street to the detriment of 9 streets
2. **The Section of the Diamond and Circle Options next to the neighbors at Lyon and Richardson and the Palace of Fine Arts to be eliminated.** There is no necessity for this change.
3. In both the Diamond and Circle Option there is an attempt to redirect traffic into **Gorges from Doyle Drive. Therefore, we request that the slip exit from Gorges into Lyon Street be closed.** This will protect Lyon, Chestnut, Greenwich, Filbert, and Union Streets Neighbors and Merchants from the Overflow traffic.
4. **Change the Entrance into Doyle Drive From Marina Blvd. from one lane back into two lanes.** This will allow more flow of traffic and less back up traffic and diverted traffic in the neighborhood.

COMMENTS ON THE DEIS/R DOYLE DRIVE

With deep regret, our organization must reply to a flawed and deficient Draft EIS/R for Doyle Drive.

This Draft is based upon assumptions that consists of what is perceived of an effort to seek out figures and studies to substantiate the assumptions without studying all of the information of the studies available for more accurate results.

The majority of the study appears to be based on the EIR/S of the Presidio Trust(PTMP). This study did not study in depth the ramifications of impacts upon the

socio and economic impact upon the adjacent Neighbors and Merchants.

The assumption that you are building an existing facility and therefore there will be no more increased traffic and impacts upon the adjacent neighbors is defective in your duty to provide the citizens of San Francisco True Facts.

2
Cont

TRANSPORTATION and LOS STUDIES

The LOS Studies are conflicting and ambiguous at best. You cannot state that there be no more increased impacts on Richardson because the slip coming into Richardson has been changed from two lanes to three lanes.

In most of your studies you have based your counts on the counts at the Golden Gate Bridge. The Transportation Authority did not factor the counts of vehicles that come of Veterans Blvd/Park Presidio.

The LOS studies appear to be based upon on the assumptions of the required speed limit not the actual speed of the flowing vehicles.

There are no studies of the baseline maximum capacity of the proposed structures of the alternatives. Thus, you cannot base LOS unless you have an accurate baseline count that includes the maximum capacity of each alternative.

There is no mention of the State of California and other studies that project an increase of 250,000 more vehicles a day within the bay area by 2030.. According to your own experts in public meetings of that 250,000 the Transportation Authority expects that the increase on the Golden Gate Bridge will be 25,000 more vehicles a day. This calculates to 6,255 more vehicles on Marina Blvd., 9,372 more vehicles on Richardson and Lombard, and Veterans Blvd/Park Presidio a day. Therefore, the assumption of what may be perceived as propaganda of the paid advocates and presenters of the Doyle Drive Alternatives that have said that there will be no increase in traffic on Doyle Drive and Richardson/Lombard is misrepresentation to the public.

3

As stated by representatives of the Transportation in public meetings there will 11 % increase on Richardson /Lombard according to the studies in Alternative 5 with the diverted traffic from Marina Blvd even with timed lights. This would be a cumulative increase of around 11000 vehicles a day on Lombard/Richardson and this is once again not addressed in the DEIS. This will be a cumulative increase of around 19000 vehicles a day by 2030-no mention of this increase in the DEIS/R.

Because of misinformation to the public and deficient studies and reports of increase in traffic denies the Draft EIS/R and accurate cumulative conclusion. Thus, potential overflow to the neighborhoods and merchants areas will occur. This is also not mentioned in this study .

There are no substantial studies in the Draft EIS/R from Lyon Street to Broderick within the scope of this document.

4

The Commuter Traffic were addressed in this document and mitigations of mass transit were mentioned. There was no mention of the statistics of the Tourists that also drive from around the country to drive across the Golden Gate Bridge. There was no quantitative study of how many of the commuters are tourists. Thus your assumptions are inaccurate for mass transportation.

5

A model is only as good as the information supplied to the model. Please in your answers to the above supply the public with every traffic count that you have within the

Transportation authority that was used in each section of the model study and every count(not just their summaries that that was not used in the model in their entirety (not just their summaries) and explain the mathematic principal that was used in each section of the model and why you chose that particular counts for each section of the model.

5
Cont

Please explain in my reply why these cumulative increases on Lombard/Richard are not going to cause diverted traffic into the Marina-Cow Hollow Neighborhood.

The exit from Marina Blvd. into Doyle Drive has been changed from two lanes into one lane entering Doyle Drive. This will cause traffic to back up even more than it is now and will cause the drivers to look for alternative routes throughout the middle (residential) of the Marina.

FUTURE MITIGATIONS of ALTERNATIVE TRANSPORTATION and ROUTES

There is no mention of a need for future mitigations to alleviate future congestion problems such as by-pass to Broadway, Bart to the North Bay, Ferries and other mitigations.

6

URBAN STREET LEVELS OF SERVICE

Weekend Peak Hours-No mention of South of Doyle Drive within the scope of the study. Once again it appears that the Transportation Authority is catering to the Presidio and NOT to the neighbors (citizens of San Francisco)and the socio/economic impacts upon them.

There are no studies of the multiple (52 weeks of the year Special Events on weekends within the City and County of San Francisco. There is no mention of the traffic impacts of the tourists from the greater Bay Area that come into our city on the weekends. Many of the patrons of these events come into the City of San Francisco during Non Peak Hours to enjoy the City before the event. There are no counts for this in this document.

7

ELIMINATED EXISTING CONDITIONS

There is no study of the recently(before the Draft EIS/R)new Light at Doyle/Lyon and Richardson. There is no study of the existing backed up traffic from this light and how this existing problem will affect Alternative 2 and Alternative 5 and how it is and will affect the adjoining neighbors and merchants.

8

High 101 is the main entranceway into the City of San Francisco and is in the Middle of the Marina -- Cow Hollow. There was no mention of a study for pedestrian safety within the city streets and mitigations for pedestrian safety within the confines of this study for San Franciscans.

9

THE DAILY ENERGY CONSUMPTION STUDY

The daily consumption study does not include vehicles larger than small trucks. There is no mention of 6 wheels or larger which travel from Doyle to Lombard every day. Thus the study is inaccurate. The conclusion provides a false assumption concerning the impacts to the neighbors, merchants, plants and wildlife within the adjacent areas.

10

STUDIES OMMITTED

There no Study of future diverted traffic and possible mitigations.

11

There is no study of the distributions of pollutants of the existing pollutant on the current Doyle Drive , there is no study of the existing pollutants that lodge on the current Doyle drive. Thus, there is no baseline to evaluate whether there will be a increase in pollutants on the ground level(alternative 5)and the impact upon humans, animals and plant life. The pollutant study is deficient. Please provide all studies in their entirety(not just the summaries) and please provide all studies in their entirety(not just the summaries) that were not used. This once again appears to be a study based upon assumptions.

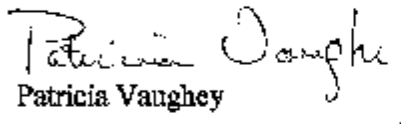
12

NOISE

With the increase in traffic (particularly alternative 5) within the greater Marina/Cow Hollow the noise levels will increase above levels above environmental law. This study is not in the Draft EIS/R.

13

Thank you,


Patricia Vaughey



Comments on the Doyle Drive Project DEIS/R

Reviewer: Marina – Cow Hollow Neighbors and Merchants

Reviewer's Comment Number	Response	Database ID
1	The Preferred Alternative was refined based on input received while still maintaining traffic operation LOS. The design workshops investigated many design refinements which as been incorporated into the Preferred Alternative, see Section 2.5.1.	1353
2	Based on the scope and location of the project, it has been determined that there would not be any socioeconomic impacts beyond those experienced within the Presidio (see Sections 3.2.1 and 3.2.4). Any potential traffic related impacts to those areas surrounding the Presidio are presented in Temporary and Permanent impact discussion in Section 3.2.8 of the FEIS/R.	1354
3	Traffic forecasts include traffic from Park Presidio and the Golden Gate Bridge, as well as Lincoln Boulevard in the Toll Plaza area. LOS studies are based upon the anticipated speeds given design treatments and posted limits for free-flowing vehicles. Faster auto speeds would result in improvements to LOS. Traffic forecasts are prepared in accordance with MTC and FHWA requirements and assign traffic growth throughout the Bay area roadways. Traffic growth in this corridor is projected to be lower than the statewide average because the growth projections in the immediate areas of northwest San Francisco and Marin County are lower, coupled with constrained traffic conditions at the natural gateways to the study area -- the Golden Gate Bridge, the MacArthur Tunnel, and Marina Boulevard and Lombard Street in the Marina District of San Francisco.	1355
4	The project proposes no changes to this area. This area was included in the expanded traffic study and no adverse impacts from the project were detected.	1356
5	All forecasts contain an assumptions of additional San Francisco tourist traffic. Design conditions were studied for the AM and PM peak hours, when tourist traffic is less but peak traffic is highest, as well as a weekend condition when tourist activity is the highest.	1357
6	Project alternatives were defined according to the Purpose and Need for the project. Major regional projects were not evaluated for this reason. Evaluation of major regional transportation projects are important to consider in other, larger studies, and are currently under consideration through separate strategic studies such as the Regional Rail Plan and the required Regional Transportation Plan, both currently in development by the Metropolitan Transportation Commission.	1358
7	Weekend conditions are studied at study area intersections, see Section 3.2.8, Exhibit 3-22. All forecasts contain an assumptions of additional San Francisco tourist traffic. Design conditions were studied for the AM and PM peak hours, when tourist traffic is less but peak traffic is highest, as well as a weekend condition when tourist activity is the highest, see exhibits in Section 3.2.8.	1359
8	Traffic studies were based upon the base year established in the Notice of Preparation for the study. The EIR also explains why 2000 conditions were a more appropriate base year, as the traffic volumes were higher at that point in time. Studies also show that peak traffic from the Golden Gate Bridge is 15 to 20 percent less than the estimates used to calibrate the base year model.	1360
9	To analyze any potential impacts on neighborhoods, the traffic study was expanded beyond the original parameters studied in the DEIR/S. The results of this expanded analysis are presented in the FEIR/S. No adverse impacts from this project onto the neighborhoods was indicated.	1361



Comments on the Doyle Drive Project DEIS/R

Reviewer: Marina – Cow Hollow Neighbors and Merchants

Reviewer's Comment Number	Response	Database ID
10	The energy study was revised and is included in Section 3.3.6 of the FEIS/R.	1362
11	To analyze any potential impacts on neighborhoods, the traffic study was expanded beyond the original parameters studied in the DEIR/S. The results of this expanded analysis are presented in the FEIR/S, see the discussion under the Preferred Alternative in Section 3.2.8. No adverse impacts from this project onto the neighborhoods was indicated.	1363
12	The comment is concerned with existing particulate matter levels deposited onto Doyle Drive, and it is concerned with future levels deposited around Doyle Drive as a result of the Project. There are no measurements of existing pollutant levels deposited onto the surfaces around Doyle Drive. However, these levels are a function of the ambient air concentrations of particulate matter above the surfaces. The nearest monitor that measures particulate matter in that ambient air is at Arkansas Street. The DEIS/R shows that measured levels at this monitor are generally below the standards. Levels in the Project area would actually be lower than levels measured at Arkansas Street, because the Project area is usually upwind of the San Francisco urban area which is the main source of particulate matter in the region. As a result, particulate matter deposited on Doyle Drive would be low and would not measurably affect humans, animal and plant life.	1365
13	With the expanded traffic study, the noise study was revised to address potential impacts to neighborhoods. As no additional traffic impacts were detected, no additional noise will occur with the project.	1364



NEIGHBORHOOD ASSOCIATIONS FOR PRESIDIO PLANNING

3040 Pacific Avenue, San Francisco, California 94115

415-474-2466 huka@earthlink.net

Cow Hollow
Association

Golden Gate Valley
Neighborhood
Association

Take Street Residents
Association

Laurel Heights
Improvement
Association

Lincoln Park
Neighborhood
Association

Pacific Heights
Residents Association

Planning Association
for the Richmond

Presidio Heights
Association of
Neighbors

Presidio Terrace
Association

Sea Cliff Properties
Association

West Presidio
Neighborhood
Association

March 29, 2006

REC'D APR 03 2006

Mr. Leroy Saage, Project Manager
San Francisco County Transportation Authority
100 Van Ness Ave., 26th floor
San Francisco, CA 94102

Doyle Drive Draft EIS/R Comments

Dear Mr. Saage:

Neighborhood Associations for Presidio Planning (NAPP) is a coalition of eleven San Francisco neighborhood groups bordering the Presidio National Park. NAPP delegates have been meeting monthly since 1989 to monitor the Presidio and to respond to activities and issues there that affect our neighborhoods. Most of our members, such as those who live in the Marina, Cow Hollow, Pacific Heights and the Richmond are and will continue to be directly affected by the flow of traffic on Doyle Drive.

In July 2004, NAPP wrote the San Francisco County Transportation Authority in support of Michael Painter's plan for Doyle Drive, which is now called Alternative 5: Presidio Parkway Alternative. We believe it to be superior to all other alternatives that we've seen over the years. We also understand that it meets safety and traffic requirements, appreciate its design and character and consider it appropriate to its setting in a national park.

NAPP supports Alternative 5.

NAPP reaffirms that basic position. The other choice, Alternative 2: Replace and Wide, replicates the existing structure, except that it would be twice as wide and taller in the no-detour option, which is its most likely construction method. While Alternative 2 meets safety and road capacity goals, it fails to meet many other basic objectives of the project, including direct access to the Presidio and an appropriate character for a roadway that traverses a National Historic Landmark District and national park.

According to the Doyle Drive Draft EIS/R, the working population of the Presidio is forecast to more than triple from the current 2,000 to 6,900 people in year 2020. Many of them will be working at Letterman Digital Arts. Under Alternative 2, we think that our streets that are city-side of the Lombard Gate would be overwhelmed and the backup on Lombard Street could extend to or east of Divisadero Street. This result of Alternative 2 would be unacceptable for our neighborhoods east of the Presidio.

(Page 2 – Doyle Drive Draft EIS/NAPP)

By providing direct access to the Presidio, as called for in the project's objectives, Alternative 5 will help to mitigate congestion on our city streets. While the DEIS/R shows that Alternative 2 costs less, it appears that much of that "savings" comes from the failure to provide direct Presidio access and to meet other such project objectives.

NAPP supports Circle Drive.

We urge agreement on a design that meets these objectives:

1. Respects and minimizes impacts on the Palace of Fine Arts and maximizes views from the Palace to the Golden Gate Bridge;
2. Keeps Palace of Fine Arts traffic off the residential blocks of Lyon Street;
3. Discourages non-Presidio traffic from cutting through the national park;
4. Creates an entry to the Presidio that not only draws attention to its combination of historic buildings and natural areas, but also maximizes views of the Golden Gate Bridge.

2

The DEIS/R offers two options, Circle Drive and the Diamond Interchange. Each has tradeoffs, but Circle Drive appears to best meet our objectives for this area.

We note that both options keep a connection between the southern end of Gorgas St. and Lyon St. Because buses are prohibited on that portion of Lyon St., the link serves no transit purpose. Therefore, we view this as an opportunity for traffic to cut through the neighborhood and recommend against that connection.

NAPP supports the Hook Ramp option at the Park Presidio interchange.

It is our understanding that the original proponents of the Loop Ramp option, including Michael Painter, no longer support it because, after environmental review, it was found not to offer significant benefits, would be visually intrusive as seen from Crissy Field, and has an unjustified cost. We agree.

NAPP opposes the Merchant Road Slip Ramp.

It is costly, increases the width of what is already the widest part of Doyle Drive, and offers relatively slight improvements for traffic movements. Its costs outweigh its benefits.

NAPP supports Context Sensitive Design refinements.

Refinements based on these principals have continued after the deadline for changes in the DEIS/R and that process has directly improved the design by the Palace of Fine Arts. We think that Context Sensitive Design and other refinements in areas affected by Doyle Drive should continue into the next phase of the project and be incorporated into its final design. Should refinements in other areas of the project be needed, we urge the same respect for the project's location within a national park as for its impact on adjacent neighborhoods and the quality of residential life in the adjacent City of San Francisco.

NAPP recommends that some form of the Doyle Drive Task Force continue to meet to mitigate the impact on the City of San Francisco and adjacent neighborhoods to the Presidio.

3



Comments on the Doyle Drive Project DEIS/R

Reviewer: Neighborhood Associations for Presidio Planning

Reviewer's Comment Number	Response	Database ID
1	Support for Alternative 5 noted.	1464
2	Comment noted.	1465
3	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.	1466

REC'D MAR 29 2006

PEOPLE FOR A



PEOPLE FOR A GOLDEN GATE NATIONAL RECREATION AREA

3627 Clement Street • San Francisco, CA 94121
Phone/fax: (415) 752-2777 • PFGGNRA@pobox.com

March 27, 2006

**OFFICERS AND
STEERING
COMMITTEE**

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Robin Sweeny
Michael Vasey
Laurie Wayburn
Robert C. Young

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

Re: Doyle Drive Draft Environmental Impact Statement/Report

Dear Mr. Saage,

People For a Golden Gate National Recreation Area is a coalition of conservation- and civic-minded groups and individuals that since 1970 has worked for authorization of the GGNRA, and then for its expansion and implementation of its legislation. One of our efforts resulted in inclusion of the entire Presidio in the national park.

Conversion of the Presidio from army post to national park has been a major goal of this organization since 1989, when the Presidio was declared excess to our nation's military needs. PFGGNRA supports Michael Painter's Presidio Parkway, Alternative 5, because it furthers this goal. The Painter plan calls for restoration and improvement of many Presidio features, including:

- expansion of the Crissy Field marsh
- restoration of the lower reach of Tennessee Hollow
- public access to the historic batteries on the bluffs opposite the national cemetery
- reconnection of the Main Post and Crissy Field for the first time in 70 years

The Painter plan will provide a far more compatible project through the national park, and a parkway experience for drivers. It will encourage traffic to move at a moderate and steady pace and will provide greater protection for pedestrians and bicyclists using crosswalks where Doyle Drive will intersect with Presidio and city streets. It directs traffic which wants to go to the Presidio to the Presidio, and not through the neighborhoods as does Alternative 2.

Automobile noise is a major distraction in parts of the Presidio. The parkway's tunnels will quiet traffic past two sensitive areas, the national cemetery and the Main Post, and will eliminate the environmental impacts of highway and vehicle lighting in those areas.

We are greatly encouraged by the commitment in the EIS to continue to refine the designs. We understand from those involved in that process that Michael Painter has made considerable progress in this regard, including greater protections for cultural and natural resources and safety for park users, in a process the EIS calls "Context Sensitive Design." That process should continue even after the close of public comments.

2

We strongly support the Circle Drive option at Richardson Ave. Circle Drive will allow the Palace of Fine Arts and the Presidio's Letterman area to be reconnected, reflecting their relationship during the historic Panama-Pacific International Exposition. They will improve sight lines from the areas between the Letterman Digital Arts buildings and its magnificent park, and to and from the Palace, and allow far better public access between these important cultural sites. These are issues which the Advisory Council on Historic Preservation asked to be strengthened when they reviewed the designs for Letterman Digital Arts, and to which the Presidio Trust agreed. We understand that Michael Painter is working on designs for Circle Drive that would improve public transit connections between Golden Gate and Muni buses, and the PresidiGo shuttle, which are much needed to give visitors and workers good alternatives to use of private vehicles.

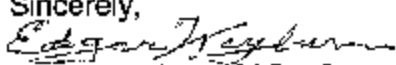
3

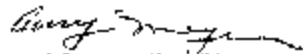
These significant improvements will come at the cost of the removal of the Presidio pool which is managed by the YMCA. This aging facility should be documented in a Section 106 historic preservation process. It should then be replaced, with Doyle Drive mitigation funds, with a building on a site near the main YMCA building.

4

It appears that Michael Painter received no credit in the draft EIS document. We hope you will correct this in the final document. His efforts have made an enormous difference.

5

Sincerely,

Edgar Wayburn, M.D., Chairman


Amy Meyer, Co-Chairman



Comments on the Doyle Drive Project DEIS/R

Reviewer: People for a Golden Gate National Recreation Area

Reviewer's Comment Number	Response	Database ID
1	Support for Alternative 5 noted.	1474
2	Comment noted and the process of Context Sensitive Design is being incorporated into the refinement of the Preferred Alternative, see Section 2.2.3.	1475
3	Comment noted.	1476
4	The pool will not be impacted by the Preferred Alternative.	1477
5	Mr. Painter is credited in the FEIS/R.	1478



Planning Association for the Richmond

3145 Geary Blvd., # 205 - San Francisco CA 94118-3316

Voice Mail -- 415-974-9332 - Fax -- 415-641-8621 - Email -- president@sfpar.org - www.sfpar.org

21 March 2006

Leroy L. Saage
Doyle Drive Project Manager
San Francisco County Transportation Authority
100 Van Ness Ave., 26th Floor
San Francisco, CA 94102

REC'D MAR 24 2006

RE: Doyle Drive DEIS/R

Dear Mr. Saage:

The Planning Association for the Richmond (PAR) Board of Directors has voted unanimously to support Alternative 5 - The Presidio Parkway, as our greatly preferred alternative for the reconstruction of Doyle Drive. However, there are several aspects of the DEIS/R analysis which we feel either unfairly stress negative impacts of the Parkway Plan or are inadequately addressed -- these are set forth below. 1

PAR, founded in 1970, is the largest neighborhood association in San Francisco. We have a dues-paying membership of approximately 1,500 households in the Richmond District. The Richmond is one of only two San Francisco neighborhoods providing direct north-south access to this vital transportation corridor between San Francisco and Marin Counties. The Doyle Drive/Veterans Boulevard interchange (Highway 1) carries a very high north-south traffic volume within our City. In addition, the Richmond has the longest border of any neighborhood with the Presidio. Obviously, the proper configuration, viability and operation of this important highway segment is of vital importance to the citizens we represent.

PAR has been fortunate in having a member of our Board, Paul Epstein, serve on both the original and the present Doyle Drive Task Force, and we have hosted several public informational presentations during the planning process over the past several years. Attached, you will find our letters of 3 June 2003 to Jose Luis Moscovich, SFCTA, and of 23 April 2004, to Senator Diane Feinstein -- both of which serve to emphasize our continuing and consistent support for the Parkway Plan.

The DEIS/R analysis of impacts of Alternative 5 unfairly stresses negative impacts which are out weighted by many positive aspects of this Parkway proposal, and, in some instances are inadequately addressed.

The Hook Ramp

The Hook Ramp is the preferred alternative adopted by the PAR Board of Directors. However, there is no adequate explanation in the DEIS/R of the financial savings of constructing that alternative as compared with the cost of the apparently more expensive Loop alternative. It would appear that there would be substantial savings with the Hook Ramp -- this needs further explication. 2

The Merchant Road Slip Ramp.

PAR believes that the negative impacts of this alternative are not adequately set forth in the DEIS/R. Additionally, it is not made clear how much money would be saved by elimination of this alternative. 3

Veterans Boulevard - Highway 1

The DEIS/R fails to adequately address the safety and environmental impacts of the Doyle Drive reconstruction upon Veterans Boulevard. It fails to delineate alternative mitigations and fails to adequately explain the financial impacts of various alternatives. 4

First, the omitted section -- Inexplicably, approximately forty percent (40%) of the portion of Veterans Boulevard that runs north from the MacArthur Tunnel to Doyle Drive, is omitted from the Construction Corridor. This is despite that fact that almost the entire omitted portion is included in the Biological Project Study Area.. There is no analysis of the logic of treating a significant portion of Veterans Boulevard in a manner different than the remainder of the roadway. 5

Second, the partial rebuild – All the DEIS/R alternatives, apparently, will only provide for rebuilding that portion of Veterans Boulevard presently included in the Corridor. There is no explanation as to why the safety and other roadway conditions (paving, shoulders, viaduct, barriers, etc.) that feed into the included portion should be ignored in the omitted portion. The age and existing condition of the entire feeder roadway system is the same. Why should only a portion be made safe and brought up to current standards? 6

Third, funding for Veterans Boulevard -- The DEIS/R fails to analyze how much it would cost to complete the rebuilding of the entire roadway from the MacArthur Tunnel to Doyle Drive. An analysis of potential savings from the elimination of the Loop Ramp option and the Merchant Road Slip Ramp option and other potential savings should be addressed. 7

Thank you for the extraordinary effort you have made in shepherding this process. PAR greatly appreciates your efforts as well as those of Michael Painter, without whom the Parkway Plan would never have been envisioned. There is no question that absent your remarkable public/private cooperation, we could not have progressed to this stage. Please keep PAR informed as to how we may assist in bringing the project to fruition.

Sincerely,



Ron Miguel, President

- CC: Supervisor Alioto-Pier
- Supervisor McGoldrick
- NAPP
- SPUR
- Geary Boulevard Merchants Association
- Clement Street Merchants Association



Comments on the Doyle Drive Project DEIS/R

Reviewer: Planning Assoc Richmond

Reviewer's Comment Number	Response	Database ID
1	Support of the Presidio Parkway Alternative noted.	1832
2	As shown in Exhibit 2-38 of the FEIS/R there is an approximate \$11 million savings between the Hook and Loop ramps, primarily due to a smaller footprint.	1833
3	See Exhibit 2-38 of the FEIS/R - The Merchant Road Slip Ramp would have added an additional \$14 million to the project.	1834
4	The study area for Doyle Drive Project was extended to include the portion of Highway 1 north of the MacArthur Tunnel. During the alternative screening process it was determined that the Kobbe undercrossing did not require repair or replacement based on its current structural condition. The portion of Highway 1, including the Ruckman undercrossing, that needs to be replaced as part of the Doyle Drive Project were included in the project analysis.	1835
5	The limits of the Doyle Drive replacement project are based on logical termini and independent utility (see Section 1.4.3 of the FEIS/R) to satisfy the project purpose and need. The reconstruction of Highway 1 extends only as far south as needed to accommodate the reconstruction of the Park Presidio Interchange. Furthermore, as the project is located within a National Park and National Historic Landmark District, every effort must be made to minimize the project's footprint and associated impacts.	1836
6	As stated in response to Comment #1836, the reconstruction of Highway 1 extends only as far south as needed to accommodate the Park Presidio Interchange in keeping with the logical termini for the project. In addition, the condition of the Kobbe structure is such that it does not meet the criteria to be programmed for replacement at this time but it will continue to be monitored as part of the regular bridge inspection program. A memorandum regarding the condition of existing structures and the need for replacement has been prepared.	1837
7	Reconstruction of the entire Veterans Boulevard is not part of the Doyle Drive Project and therefore was not analyzed. In addition to the logical termini of the project, there are no overriding reasons to replace the entire Highway 1 facility and increase the level of impact within the park. Detailed project costs were developed for the alternatives under consideration in the EIS/R. In addition, the project has undergone extensive value engineering with the goal to reduce the overall project cost.	1838

Presidio Environmental Council
Alliance for a Clean Waterfront ♦ California Native Plant Society
Dune Ecological Restoration Team ♦ Golden Gate Audubon Society
Natural Resources Defense Council ♦ San Francisco League of Conservation
Voters
San Francisco Tomorrow ♦ Sierra Club

March 31, 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:

Thank you for the opportunity to comment on the DEIS/R on the South Access to the Golden Gate Bridge – Doyle Drive. We would like to express our appreciation for the generous amount of time the Project Team members have dedicated to meeting with various communities of interest, for their responsiveness to public commentary and their willingness to quickly make commonsense changes. Additionally, we would like to give recognition to architect Michael Painter for his unstinting dedication to creating a beautiful and park friendly alternative for the public to review. We are very appreciative of his efforts.

The South Access to the Golden Gate Bridge is a very special roadway as it goes through and will affect portions of the Presidio, a National Park. Any alternative selected for the South Access will need to be especially sensitive to environmental concerns during siting, construction, operations and maintenance in order to (as stated on page ii of the DEIS) “preserve the natural... values of the affected portions...to minimize the effects of noise and other pollution from the Doyle Drive corridor on natural areas and recreational qualities at Crissy Field and other areas adjacent to the project area”.

A number of groups focusing on the protection of the natural environment, convened under the umbrella organization, Presidio Environmental Council, supports Alternative number 5, as most recently described by Michael Painter on March 22, 2006, with the following reservations, which we will be sharing with the various permitting agencies.

1

PROCESS

We recommend and urge that a mechanism be put in place to ensure the coordination of the Doyle Drive Replacement Project with the Tennessee Hollow Restoration and Crissy Wetland Expansion projects. Specifically, we strongly encourage the appointment of a special project manager/coordinator to oversee a collaborative design effort for the intersection of these three projects. Such project manager/coordinator should initiate collaboration between and among the National Park Service, the Presidio Trust, and the Local, State and Federal and Transportation Agencies to accomplish the following:

2

Presidio Environmental Council
Steven Krefting, Convener
45 Montcalm St., San Francisco, CA 94110-5357

- take active steps to coordinate the planning and expansion of the Crissy wetland and the planning and restoration of the lower reach of the Tennessee Hollow Watershed
- establish timelines and action plans to coordinate *successfully* with the timing required of the Doyle Drive Project
- provide the public with detailed ecological restoration and wetland expansion plans
- continue to involve the environmental community throughout the decision making process to help to ensure that the FEIS is the best possible document and the Doyle Drive replacement alternative chosen is the most environmentally responsible option.

ECOLOGICAL CONCERNS & IMPACTS

The following issues and concerns will need to be addressed before the natural environmental community can support the chosen alternative:

A. Tennessee Hollow Crossing and the Crissy Wetland Expansion

1. Define how the section of roadway crossing the wetland and/or riparian areas will be designed to allow maximum daylight, wildlife movement, bird flight, and clearance under the roadway. 3
2. Further explore the use of translucent glass or similar materials to be used on the roadway to increase daylight passage into the wetland area. 4

3. Impacts on Tennessee Hollow and Crissy Lagoon:

In the last paragraph on page 3-133, the first sentence should be re-written to read: "A challenging issue for the build alternatives is the crossing of Tennessee Hollow **and** an expanded Crissy wetland." **Both** the connection of a restored Tennessee Hollow Watershed to the Crissy Lagoon and Marsh **and** the expansion of the lagoon and marsh must be accommodated by the Project. 5

4. Where the road crosses the Tennessee Hollow Watershed riparian corridor/Crissy wetland, the foundation abutments should be located so as to avoid both the dry season creek bed and the wet season floodplain. 6

B. Animals

1. Safety features should be designed into the roadway to enable wildlife to pass 7

safely from one side of the facility to the other, e.g. at the Main Post, the National Cemetery and Fort Scott (*mammals, birds, reptiles, amphibians, and invertebrates*).

2. Lighting should be used that minimizes attraction to the roadway of insects and/or flying wildlife which prey on insects.
3. Incorporate appropriate design features to minimize the impacts of roadway noise, especially in proximity to the Battery Howe Wagner wetland, a site of significant natural resource value for many bird species.
4. Landscape and revegetation design immediately adjacent to and within the roadway should be chosen to minimize animal contact with traffic.

7
Cont

C. Vegetation, Revegetation, Landscaping and Weed Management

1. All revegetation should be done taking the needs of wildlife into consideration and should be coordinated by National Park Service and Presidio Trust natural resource experts.
2. Revegetation throughout the Doyle Drive construction corridor should be done with locally native species, woven into the fabric of the natural landscape of the area, and executed with particular attention paid to the potential for major weed invasion. For a list of priority weeds for San Francisco County, including the Presidio, see www.sfwma.org.
3. Looking to the Crissy Field Restoration project as an appropriate reference site, we cannot emphasize too strongly the critical need for all noxious and invasive weed abatement to be aggressive and thorough before, during and after construction and revegetation..
4. Rare plants, such as the San Francisco gumplant and skunkweed, both Federal Species of Concern, will be destroyed and should be mitigated in kind, in the same watershed. San Francisco gumplant, *Grindelia hirsutula ssp. maritima*, in particular, is also on the California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants, classified as a 1B - Rare and Endangered throughout all of its range.

8

9

10

11

The population of San Francisco owl's clover, *Triphysaria florabunda*, in between the Log Cabin and the Doyle Drive roadway is the largest south of the Golden Gate Bridge, and should be given extra protection during construction. This species is also on the CNPS list as a 1B.

12

- 6. Where historical planting is done, it should be with non-invasive plant species and come from the current Presidio plant palette. 13
- 7. We support and recommend adoption of Daniel Ariola’s Peer Review Comment dated March 10, 2006, in which he said, “it seems reasonable to fund a small endowment to cover long-term costs for managing exotics”, i.e., the Doyle Drive Project must fund a long-term ecological stewardship program for the corridor. 14

D. Natural Communities, Habitats and Geologic Resources

- 1. Serpentinite is the dominant bedrock in the vicinity of the 101/1 interchange. While the overwhelming majority of natural resource impairment occurred as a result of the first Doyle Drive, serpentine habitat will be impacted and destroyed by the Doyle Drive Replacement at the western end of the roadway and should be mitigated in kind on the ground. Not only will habitat be taken, but also the geologic resource itself. Mitigation could include liberation and restoration of areas of eucalyptus trees where serpentine bedrock and soils are still intact. 15

Likewise, we agree with the recommendation regarding rare plants made by Peter Baye in his *Technical Memorandum* to Katherine Eastham of Parsons Brinckerhoff, dated March 10, 2006, in which he states, “The EIS should identify suitable mitigation for the precluded opportunities for future rare plant habitats (restored or naturally exposed...), commensurate with the potential importance for metapopulation structure or habitat.” This applies to Franciscan thistle, *Cirsium andrewsii*, and the Raven’s manzanita, *Arctostaphylos hookeri ssp. ravenii*. 16

- 2. Any increase in impermeable surface should be mitigated. 17

E. Biological Monitoring, Preconstruction Monitoring

- 1. Establish protocols for National Park Service and Presidio Trust natural resource experts to monitor wildlife within the construction corridor. 18
- 2. Establish procedures for the public to report wildlife distress to wildlife monitors (i.e. similar to Marine Mammal hotline). 19
- 3. Provide for preconstruction salvaging and relocation of flora and fauna. 20
- 4. Preconstruction mitigation will be needed to replace plants and wildlife in a nearby location. 21

F. Hydrology, Stormwater, Water Quality and Wetlands

1. Groundwater

Especially given that the Marina basin's aquifer is thin (p 3-128), continued groundwater recharge through the infiltration of rainwater could be an essential element of the natural hydrology of the project site, including but not limited to the degree to which the freshwater aquifer limits saltwater intrusion. Therefore, any increase in impermeable surface that prevents infiltration should be mitigated. It appears that the amount of paving in Alternative 5 will be less than it is currently, but mitigation measures should be developed for Alternative 2.

22

2. Construction Dewatering

On page 3-137, it is noted that the project proponent will characterize the quality of groundwater prior to initiation of dewatering. The characterization should take place as soon as possible so that management and treatment options can be planned well in advance of the need.

23

Constructed wetlands should be considered as a potential means of treating groundwater from construction dewatering. The project sponsors should study the feasibility of creating treatment wetlands as early in the process as possible to treat the pumped-out groundwater and construction runoff in the near term, as well as stormwater runoff in the future. If at all possible, water from none of these sources should go into the City's combined wastewater system, and if at all polluted, none should be discharged into the Bay untreated.

24

3. Construction Stormwater Run-off

When will the SWPPP be prepared, what agencies will approve it, and what agencies will monitor and enforce its implementation?

25

4. Permanent Stormwater Impacts:

It appears that runoff containing road-related contaminants will be less under Alternative 5, picking up pollutants from 85,236 square feet less pavement than under the no-build alternative. Under Alternative 2, with 260,000 square feet more impervious surface, the runoff would have a highly significant impact on the environment.

However, stormwater runoff impacts must be addressed for **all** of the alternatives. The status quo is not acceptable, and regulations controlling road runoff should be, and probably will be, strengthened in the future. We appreciate the document's acknowledgement of the project's location in a national park and the special consideration that must therefore be given.

26

The priority given to the treatment options (p 3-138) for polluted runoff is backwards.

The preferred option should be the one that is the most sustainable, environmentally just and ecologically sound. A watershed approach says that water should be treated and reused as close to the source as possible. Precious energy resources should not be used to pump water from one watershed to another – and certainly not from one end of town to another.

Moreover, it is unacceptable to add to the volume of the City's combined sewage and stormwater system, thus increasing the volume of combined sewage overflows (CSOs) into San Francisco Bay. These discharges, which receive primary treatment only (the floatables and sinkables are screened out), occur primarily along the southern waterfront, an already heavily degraded area.

27

Even if the CSOs did not carry pollutants, the alteration of the natural salinity regime could negatively impact the Bay's ecosystems.

If option 1 must be pursued, then at the very least there should be on-site detention ponds or other storage to allow the desynchronization of flows into the combined system, permitting treatment capacity to be restored after a storm event before further burdening the system.

Option 2 should be the preferred option, with the added consideration of constructed treatment wetlands near the project site. Using wetlands for water treatment is a time-tested low-impact technology that has proven successful throughout the world. Many treatment wetlands are incorporated into public open spaces, where they provide the multiple benefits of pollution control, wildlife habitat, visual amenities and outdoor classrooms. Examples can be found in Ashland, OR, and Fremont and Arcata, CA, to name just a few.

We urge that a cost-benefit analysis be done to evaluate the effectiveness of building an on-site or near-site stormwater treatment solution, such as a wetland, versus the cost of sending the SFPUC a check for taking the Presidio's polluted water into an already over-capacity combined sewer system. The Presidio should not be paying SFPUC a fee to increase pollution in the Bay. What is the estimated cost of such a fee? The money could be used instead for the creation and O&M of state-of-the-art environmentally sound treatment.

28

Washdown water from cleaning the tunnels might also be directed to the treatment wetland, perhaps first to a settlement forebay that may need to be dredged periodically, depending on the nature of the contamination.

5. Hydrogeology

Given the many unknowns regarding the impacts of the project on the hydrogeology of the bluffs (**could** alter or disrupt groundwater, **potentially** impact plants, groundwater conveyance to the fractures **could be** disrupted, tunnel construction **may** increase flow to seeps, **may** create excessively moist conditions, fill on top **could become** excessively dry, etc.), it seems extremely important to have a comprehensive plan in place for careful monitoring and adaptive management.

G. Road Configuration Options, Pedestrian and Bicycle Links, and Transportation:

1. The Presidio Environmental Council does not support the Loop Option or the Merchant Road Slip Ramp because of their expense and unnecessary negative impact on the natural landscape.

29

2. Pedestrian and Bicycle Links:

There is an existing system of walkways and tunnels around the area of the facility between the toll plaza and the high viaduct. However, there is currently no way to walk or bicycle from the Golden Gate Bridge/Battery East/Long Avenue area to Fort Scott without having to travel all the way around on Merchant or Lincoln. We suggest a pathway starting at the entrance to the GGB visitor area, which goes more or less parallel to Doyle on its east side along Armistead Road, then continues under the facility to come out on Miller Road, north of the Log Cabin parking lot. This would mitigate the impact of the structure on walking and bicycling for transportation and recreation, including maintaining a naturalistic experience and greater sense of connectedness to the park's resources.

30

3. Traffic Volume

In general, the fewer the cars, the less the pollution (air, water, noise) and collisions with animals. Therefore, we would like to see the roadway designed in such a way as to make it impossible to add more lanes in the future. The proposed seventh lane from Park Presidio Drive to the Marina junction should be shortened to assure that it functions as a merging lane only and will not serve as an additional traffic lane. A design with narrower lanes should not be ruled out just because the proposed roadway is in accordance with state highway standards. Highway designers should be able to consider exceptions for a road that goes through a national park located within a city.

31

Traffic volume impacts could be considerably mitigated by providing

transportation alternatives. We would like to see more study of the feasibility of public transit, with new traffic projections based on a sustainable transportation plan. Enhanced connections and designs for accommodating Muni and Golden Gate Transit buses and any internal park shuttles, with appropriately sited transit hubs, should be incorporated into the plan. We additionally question the justifications for the proposed numbers of parking spaces and underground lots without plans in place to enhance public transportation.

32

H. Other

1. Special measures will need to be identified and adapted to protect the darkness of the night sky in this National Park to benefit both the visitor experience and nocturnal wildlife. This is particularly important as the current roadway is overhead and the new roadway, proposed in Alternative 5, will be at ground level. The current ground level road without any lights at all near the Crissy Wetland and the Tennessee Hollow connection; a known and important wildlife corridor. The minimization of night lighting is called for in the Presidio Trust Management Plan. Information and resources on this topic may be found on the web site for the International Dark-Sky Association: www.darksky.org

33

2. Funding : We want information from the Park Service and the Presidio Trust about what is and is not funded, and if not funded what are the plans to secure needed funding with regard to the ecological restoration of the Tennessee Hollow Watershed and the Crissy Wetland Expansion.

34

CONCLUSION

Thank you again for this opportunity to comment on the environmental documents for the proposed Doyle Drive Replacement Project.

The organizations that work together under the umbrella of the *Presidio Environmental Council* would like to continue to be invited to work with the Project Team and Agencies over the life of the replacement of Doyle Drive. We want to help secure the most favorable outcome for the natural environment of the Presidio. We urge you to continue your successful and progressive outreach and look forward to working with you on this important project.

Sincerely,

Peter Brastow
Director,
Nature in the City

Jan Blum
Contact
*Dune Ecological Restoration Team
(DERT)*

Jennifer Clary
Chair,
San Francisco Tomorrow

Rebecca Evans
Co-Chair,
*Presidio Committee
Sierra Club
San Francisco Bay Chapter*

Ruth Gravanis
Presidio Coordinator
Alliance for a Clean Waterfront

Amandeep Jawa
President,
*San Francisco League of
Conservation Voters*

Steven Krefting
Convener,
Presidio Environmental Council

Jake Sigg
Conservation Chair
*California Native Plant Society,
Yerba Buena Chapter*

Johanna Wald
Director, Land Program
Natural Resources Defense Council

Matthew Zlatunich
Conservation Committee
Golden Gate Audubon Society



Comments on the Doyle Drive Project DEIS/R

Reviewer: Presidio Environmental Council

Reviewer's Comment Number	Response	Database ID
1	Preference for Alternative 5 noted.	1172
2	Coordination of wetlands mitigation is currently underway with the partner agencies.	1173
3	The project team is coordinating the design of the facility over the proposed marsh restoration with the participating agencies.	1174
4	The project team continues to look for shade reducing design details in coordination with Caltrans, the Trust and GGNRA. Design refinements have increased the spacing between the north and south bound lanes which will increase the amount of light which will penetrate the structure.	1175
5	The text under Alternative 2, Alternative 5 and Preferred Alternative in the Alteration of Surface and Near-Surface Hydrology at the Main Post Tunnel of Section 3.3.1 has been changed as follows: A challenging issue for the build alternatives is the crossing of Tennessee Hollow and an expanded Crissy wetland.	1176
6	The bridges over the Tennessee Hollow area will be designed to be above the 100-year flood or coastal event. Detailed design regarding the interface between the roadway, column location and Tennessee Hollow restoration will be coordinated with the Trust and GGNRA as the Quartermaster Reach restoration plans are developed.	1177
7	The EIS/R discussed these topics. Minimizing light impacts is discussed Temporary Impacts to Common Wildlife in Section 3.4.4. Plantings along the roadway will be selected to avoid drawing wildlife into close contact with vehicles (see Avoidance, Minimization and/or Mitigation Measures in Section 3.4.4). The noise issue, however, is one the DEIS/R did not consider significant based on ambient disturbance during the construction period, with the exception of pile-driving (see discussion of Temporary Impacts for Special Status Avian Species in Section 3.4.4).	1178
8	Both agencies have approval authority over revegetation plans.	1179
9	The EIS/R addresses these concerns. See previous response and also the Avoidance, Minimization and/or Mitigation Measures in Section 3.4.5 which describes measures to avoid introducing or spreading invasive species.	1180
10	See previous response (Comment # 1180) and Section 3.4.5 of the document.	1181
11	The project is not expected to cause permanent impacts to special-status plant species within the construction area. They will be avoided through the designation of "Environmentally Sensitive Areas" (ESAs) as described in the Avoidance, Minimization and/or Mitigation Measures of Section 3.4.3. See also response for Comment #1183	1182



Comments on the Doyle Drive Project DEIS/R

Reviewer: Presidio Environmental Council

Reviewer's Comment Number	Response	Database ID
12	The EIS/R provides this direction through designation and protection of ESAs, which are considered complete avoidance of the resource (see discussion of the Permanent Impacts to Alternatives 2 and 5 and Preferred Alternative in Section 3.4.3).	1183
13	See responses to comments 1179 and 1180	1184
14	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.	1185
15	The Biological Environment chapter of EIS/R by definition limits itself to living organisms. The importance of plant communities growing on serpentine soils, as well as the Bay checkerspot butterfly, is discussed at many places in the text and provides adequate mitigation.	1186
16	It is true that the EIS/R does not identify precluded opportunities for future rare plant habitats and that NEPA (CEQA to a much more limited extent) allows considerations of impacts on hypothetical future conditions without the project, if such are reasonably predictable. There were no plans which would provide such predictions available to the EIS/R preparers, apart from the recovery plans prepared for serpentine plant species within the San Francisco Bay Area. The Natural Environmental Study (NES) describes consultations with the U.S. Fish and Wildlife Service (USFWS) regarding the impact of the project on implementation of those plans. Restoration planning for Tennessee Hollow is conceptual and preliminary, and the precluded opportunities highly speculative at this point. Notwithstanding, discussions on these and related topics with NPS/Trust natural resource staff and peer-reviewers were extensive and as a result the appended document (see response to comment 1185) was prepared to address concerns not part of the CEQA/ NEPA analysis. Metapopulation analysis is not appropriate at this scale. It is normally applied for long-term viability estimates over areas where dispersal between isolated populations is problematic, e.g., grizzly bears or spotted owls. Metapopulation models assume that some parts of the landscape are can potentially be occupied by the species in question, and the remainder is unsuitable to the point where it affects dispersal rates. In the close confines of the Presidio, the project does not significantly fragment local populations of any species beyond the conditions already present.	1187
17	The storm water management plan will be finalized as part of final design of project.	1188



Comments on the Doyle Drive Project DEIS/R

Reviewer: Presidio Environmental Council

Reviewer's Comment Number	Response	Database ID
18	It is unlikely that the NPS or the Trust would have the resources to perform such monitoring themselves, although the project would welcome their participation. The monitoring program described in the EIS/R and the NES outlines monitoring procedures and the required qualifications of biological monitors devoted solely to this activity. The monitors will submit the reports to all responsible resource agencies (USFWS, the CDFG, the NPS, or the Trust), if requested, for their review.	1189
19	The construction monitors will be present throughout the period of construction disturbance. The monitoring program will adequately the commentor's concern	1190
20	Salvage of important flora may be practicable, and the NES states (Section 8.2.5.1): "Native plants would be salvaged and replanted to the extent feasible." Relocation of animals is not proposed as a routine action, because of stress during relocation efforts, especially capture and handling, and the fact the placing animals in new suitable habitat ignores the problem that the receiving habitat is probably already at carrying capacity. The idea is not without merit, however, and the response to this comment is a commitment to developing a rescue protocol when injured animals are found by the construction monitors, with procedures for capture and transport and a standing arrangement with a competent wildlife rescue center, such as the Lindsay Museum Wildlife Hospital in Walnut Creek.	1191
21	See response for Comment 1191	1192
22	Depending on location, increases in impervious cover can exacerbate existing flooding problems, if any, and contribute to water quality degradation. Storm-related flooding and potential impacts to downstream floodplains is not a concern at the project site because of the proximity of the site to the Bay. Any increased flows from the project site will be conveyed to the Bay without causing downstream flooding. In addition, as described in Response to Comment 1171, the runoff from the proposed roadway would be treated prior to discharge (and runoff is not treated under the existing condition). Therefore, the project will result in a net benefit to receiving water quality.	1193
23	The comment is noted for the record. As indicated in the text of the DEIS/R, the groundwater quality in the vicinity of the dewatering operations would be characterized and the permit to discharge acquired prior to initiation of dewatering activities.	1194
24	If Option 2 (described under Long-term Stormwater Treatment Options in Section 3.3.1 of the EIS/R) is selected as the preferred and feasible runoff management option, then on-site land-based biofiltration, detention, and infiltrations measures will be considered and evaluated for specific application to this project.	1195
25	As described under Construction Stormwater Run-off of Section 3.3.1, the SWPPP would be prepared by Caltrans. Under the Avoidance, Minimization and/or Mitigation Measures of Section 3.3.1, the consultation/review process is described. Caltrans (and potentially the Caltrans contractor) would consult with the Presidio Trust and the National Park Service on the contents of, and actions required by, the SWPPP. Ultimately, the Regional Water Quality Control Board would be responsible for enforcement.	1196
26	Please refer to Response to Comment 1171. The "status quo" will not occur under the proposed project. Treatment of runoff from the new roadway would be required by existing regulations.	1197



Comments on the Doyle Drive Project DEIS/R

Reviewer: Presidio Environmental Council

Reviewer's Comment Number	Response	Database ID
27	Runoff from the proposed project may or may not be directed to the City's combined system. If it is determined, based on capacity analysis and risk if CSOs, that the increased discharge could impact water quality, then it is likely that the runoff would not be directed to the combined system and would be treated on-site. Both options are presented in the Section 3.3.1 of the FEIS.	1198
28	Cost of mitigation is not a required component of a CEQA/NEPA analysis, as long as specified mitigation is feasible. Treatment of project site runoff would not "result in much greater contamination to the Bay" because under existing conditions, the runoff is not treated at all and runoff would be treated under the build alternatives of the project.	1199
29	Opposition to the Loop and Merchant Road Slip Ramp options noted.	1200
30	A bicycle/pedestrian pathway is not included as part of the project alternatives nor is it necessary as mitigation since there are no permanent impacts to walking or bicycling on the western end of the project alignment. The route of the suggested pathway is already served by existing roadways and would continue to be served with implementation of any project alternative.	1201
31	The Authority, Caltrans and FHWA have made great efforts to minimize the footprint of the facility while meeting the project purpose of seismic, structural and traffic safety as indicated by the application of project specific parkway design criteria. The facility has reduced lane widths, included continuous shoulders to meet minimum safety requirements, while the auxiliary lane between Veterans Blvd and Girard road is needed to maintain adequate traffic operations.	1202
32	The Parking study was updated with the selection of the modified Alternative 5 as the Preferred Alternative. During construction, temporary loss of parking may be mitigated through the use of the Parade Grounds and the existing shuttle service. The Transportation Management Plan finalized prior to construction will address these concerns. A new parking facility located to the west of Halleck Street and south of the tunnel was proposed to meet an overall unmet parking demand of 126 spaces. The Preferred Alternative does not include the parking structure which is part of the Presidio Parkway Alternative. The project design does not preclude the addition of transit centers or additional transit services. Section 2.2.2 and 2.3.2 discuss the alternatives that were considered but determined not consistent with the project purpose and need.	1203
33	Streetlights will be designed to minimize glare where the facility is not in a tunnel.	1204
34	The project is committed to continue coordination efforts with the restoration of Tennessee Hollow to ensure the new roadway and restored Tennessee Hollow can function together; however, the question regarding the current funding of the restoration efforts would need to be directed to the Park Service and the Presidio Trust.	1205

PHAN



**PRESIDIO HEIGHTS
ASSOCIATION
OF NEIGHBORS**
www.phansf.org
P.O. BOX 29503

SAN FRANCISCO, CA 94129

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Mr. Leroy Saage, Project Manager
c/o San Francisco County Transportation Authority
100 Van Ness Ave., 26th floor
San Francisco, CA 94102

February 15, 2006

RECD FEB 17 2006

Doyle Drive Draft EIS/R Comments

Dear Mr. Saage:

Historically, the Presidio Heights Association of Neighbors (PHAN) has supported Michael Painter's Presidio Parkway now designated as Alternative 5. We believe it to be superior to all other alternatives that we've seen over the years. We also understand that it meets safety and traffic requirements, appreciate its design and character, and consider it appropriate to its setting in the Presidio National Park.

1

PHAN supports Alternative 5.

PHAN reaffirms that basic position. The other choice, Alternative 2, Rebuild and Widen, replicates the existing structure, except that it would be twice as wide, and taller in the no-detour option, which is its most likely construction method. While Alternative 2 meets safety and road capacity objectives, it fails to meet many basic objectives of the project, including direct access to the Presidio, and an appropriate character for a roadway in a national park.

2

According to the Doyle Drive Draft EIS/R, the working population of the Presidio is forecast to more than triple from the current 2,000, to 6,900 in year 2020. Many of those people will be working at Letterman Digital Arts. Under Alternative 2, cars would continue to drive through our neighborhood to reach the Presidio. The vicinity of the Lombard Gate would be overwhelmed, and the backup on Lombard St. would appear to extend to or east of Divisadero. This is unacceptable.

2
cont

By providing direct access to the Presidio, as called for in the project's Objectives, Alternative 5 mitigates those impacts. While the DEIS/R shows that Alternative 2 costs less, it appears that much of that "savings" comes from the failure to provide direct Presidio access and to meet other project objectives.

PHAN supports Circle Drive.

We urge agreement on a design that meets these objectives:

1. Respects and minimizes impacts on the Palace of Fine Arts and maximizes views from the Palace to the Golden Gate Bridge;
2. Keeps Palace of Fine Arts traffic off the residential blocks of Lyon Street;
3. Discourages non-Presidio traffic from cutting through the national park;

3

4. Creates an entry to the Presidio that not only draws attention to its combination of historic buildings and natural areas, but also maximizes views of the Golden Gate Bridge.

3
cont

We thank the project team for the effort that has gone into this complex and important design. The DEIS/R offers two options, Circle Drive and the Diamond Interchange. Each has tradeoffs, but Circle Drive appears to best meet our objectives for this area.

We note that both options keep a connection between the southern end of Gorgas St. and Lyon St. Because buses are prohibited on that portion of Lyon St., the link serves no transit purpose. Therefore, we view this as an opportunity for traffic to cut through the neighborhood and recommend against that connection.

4

PHAN supports Context Sensitive Design refinements.

Refinements based on Context Sensitive Design principles which have continued after the deadline for changes in the DEIS/R have further improved the design by the Palace of Fine Arts. PHAN urges that those refinements continue into the next phase of the project and be incorporated into the final design. Should refinements in other areas of the project be needed, we urge the same respect for the project's location in a national park.

5

PHAN does not support the Hook Ramp option at the Park Presidio interchange.

It is our understanding that even the original proponents of the Loop Ramp option, including Michael Painter, no longer support it because after environmental review it was found not to offer significant benefits, would be visually intrusive as seen from Crissy Field, and has an unjustified cost. We agree.

6

PHAN opposes the Merchant Road Slip Ramp.

It is costly, increases the width of what is already the widest part of Doyle Drive, and offers relatively slight improvements for traffic movements. Its costs outweigh its benefits.

7

PHAN remains concerned about the Lyon/Marina/Mason St. intersection.

Previously, PHAN expressed concern for the dangerous conditions at this five-way intersection at the Marina end of Doyle Drive. We appreciate that the City conducted three workshops to seek improvements to this dangerous intersection. The management of those workshops was ineffective in producing a consensus, and we've heard nothing since on what improvements would be made, nor how or when they would occur.

8

Credit for Work Done by Michael Painter.

Finally, we are very surprised that we are unable to find either credit or mention of Michael Painter, the visionary designer of the Presidio Parkway, in the Draft EIS/R. Thus, we strongly request that his work, much of it *pro bono*, be properly credited in the final document.

9

Mr. Leroy Saage
February 15, 2006
Page 3

Thank you for your consideration of and response to the above comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charles Ferguson". The signature is written in black ink and is positioned to the right of the typed name and title.

Charles Ferguson
President



Comments on the Doyle Drive Project DEIS/R

Reviewer: Presidio Heights Association of Neighbors

Reviewer's Comment Number	Response	Database ID
1	Preference for Alternative 5 noted.	1248
2	Objection to Alternative 2 noted.	1249
3	Preference for Alternative 5 Circle Drive option noted.	1250
4	Preference for Alternative 5, Circle Drive option noted.	1251
5	Comment noted. Context Sensitive Design is an important part of the alternative design process and will continue through final design.	1252
6	Opposition to the Hook Ramp option noted.	1253
7	Opposition to the Merchant Road Slip Ramp option noted. This option was not selected as part of the Preferred Alternative.	1254
8	To analyze any potential impacts on neighborhoods, the traffic study was expanded beyond the original parameters studied in the DEIR/S. The results of this expanded analysis are presented in the FEIR/S under the discussion of the Preferred Alternative in Section 3.2.8. No adverse impacts from this project onto the neighborhoods was indicated.	1255
9	Michael Painter is acknowledged in the Final EIS/R.	1256

March 29, 2006

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

Dear Mr. Saage:

The Richard and Rhoda Goldman Fund supports landscape architect Michael Painter's Presidio Parkway design (Alternative 5) for replacing Doyle Drive. In October 2005, the Goldman Fund completed renovation of 211 Lincoln Boulevard in the Presidio. We are located on the Main Post with the north side of our building facing directly on to Doyle Drive.

We believe that the Presidio Parkway design is the best plan to enhance the natural values and public use of the Presidio. Not only is the current Doyle Drive dangerous and unattractive, it effectively divides most of the Presidio from easy access to Crissy Field. The proposed Parkway would reconnect the Main Post with the waterfront and make it possible for larger numbers of people to visit and enjoy the Presidio.

As a longstanding supporter of the U.S. National Park system, the Goldman Fund has contributed over \$6.7 million in support of various national parks since 1982. As a tenant of the Presidio, we are devoted supporters of the continued protection and beautification of the park and adjoining natural areas. We are confident the project committee will agree that the Presidio Parkway is the best alternative for the redevelopment of Doyle Drive.

Sincerely,



Richard N. Goldman, President



Comments on the Doyle Drive Project DEIS/R

Reviewer: Richard and Rhoda Goldman Fund

Reviewer's Comment Number	Response	Database ID
1	Preference for Alternative 5 noted.	1513

SFB prefers the Circle Drive option because it would provide a more beautiful and gracious entry to the Presidio and give greater respect to the Palace of Fine Arts by placing the roadway farther from that historic site. We support the Circle Drive objective of visually and physically reuniting the Presidio and the Palace, as they were during the historically significant 1915 Panama Pacific International Exposition. However, the consequential but necessary loss of Bldg. 1151 must be fully mitigated by the project. Circle Drive should be constructed during the latter phase of the Project if at all possible, so that there is ample time for mitigation to be completed first. If Circle Drive is able to incorporate better transit access to the area, so much the better!

2
Cont

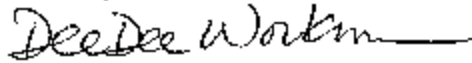
3

SFB is very disappointed to find no credit to the parkway's creator, Michael Painter, in the Draft EIS. We request that this oversight be corrected in the final document and that apologies to Mr. Painter and MPA Design be recorded in the Response to Comments.

4

Thank you for providing SFB with the opportunity to comment.

Sincerely,



Dee Dee Workman
Executive Director
San Francisco Beautiful



Comments on the Doyle Drive Project DEIS/R

Reviewer: San Francisco Beautiful

Reviewer's Comment Number	Response	Database ID
1	Support for Alternative 5 noted.	1839
2	Project option preferences noted.	1840
3	In July 2006, Alternative 5 with the Diamond interchange option was selected as the Preferred Alternative therefore Building 1151 (YMCA Pool) will remain intact.	1841
4	Michael Painter is acknowledged in the Final EIS/EIR.	1842



885 Market Street Suite 1550
San Francisco, CA 94108

30 March, 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

Amended

please discard
our earlier
comments dated
25 March 2006

RE: Doyle Drive DEIS/R Comment

Dear Mr Saage:

The San Francisco Bicycle Coalition (SFBC) is a 5300-member nonprofit advocacy organization promoting the bicycle for everyday transportation in the city. We are pleased to share our comments on the Draft Environmental Impact Study/Report (DEIS/R) for the Doyle Drive Reconstruction project.

Although the SFBC envisions an ideal world where there is bicycle access on every major transportation facility equivalent to automobile access, we recognize the financial and engineering implications of designing a bike path for the Doyle Drive Reconstruction. Therefore, we have instead focused our energies on ensuring that safe, direct, and inviting alternate routes for bikes and pedestrians are provided in conjunction with any new facility and that the new facility does not degrade any existing conditions.

Specific comments on the Draft EIR:

- 1) We strongly favor Alternative 5 - The Presidio Parkway due to its
 - a. reduced footprint and potential for open space;
 - b. aesthetic design with increased landscaping and terraced roadways;
 - c. potential for improved traffic calming elements in its detailed design and interface with surface streets.
- 2) If the Parkway Alternative is selected, bike lanes (with lane cross-overs at right turn conflicts) be installed on the new extended Girard Street, since this will be the most direct route from Marina Blvd/Lyon to and from the Letterman complex and other central post destinations. Cyclists will take this route and should have safe access designed into the new roadway. (The Old Mason and Halleck route is much longer and can be used by cyclists who prefer a less direct route with less traffic)
- 3) We strongly prefer the Circle Drive option because it would allow for a new, safe and convenient pedestrian and bicycle connection between the Palace of Fine Arts and the Presidio, and because the latest version we have seen would

permit, for the first time, a convenient transfer between all three transit systems: Golden Gate, Muni and PresidioGo. We regard that transfer as a critical objective of the Parkway project. We are concerned that the Diamond option appears to create a dangerous condition where northbound buses are moving left from the bus stop after Lyon St., while traffic is moving right to exit the ramp. In addition, the Diamond ramp adds another road intersecting Girard St., creating another opportunity for auto, bicycle and pedestrian conflict.

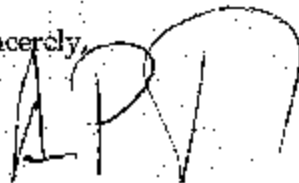
4) We support continuation of the process of bringing representatives of agencies and citizens groups together to improve the detailed design of the Parkway, in particular improved transit connections and safe bicycle and pedestrian crossings of the roadway. This process is identified in the EIS as Context Sensitive Design.

5) In light of the fact that there are no tangible alternative transportation improvements included in the \$600- \$700M price tag and that the existing walkway on the Doyle Drive structure will be eliminated, we ask that the following mitigation measures be included in the Final EIR to provide for improved access for non-motorized transportation:

- a. Reconfigure the uphill portion of Crissy Field Ave from Mason St to Lincoln Blvd. into a two way bike way and pedestrian path with emergency vehicle access only. Cars from Crissy Field and the Presidio Post area should be directed to the new parkway via Girard or alternate routes as needed.
- b. Install a wide multi-use path along the East side of Lincoln Blvd or other improved configuration along Lincoln between the junction of Crissy Field Blvd and Vista Ave. This is currently a heavily used, yet dangerous and uninviting corridor.
- c. Study and install other traffic diversion or calming measures to further discourage commuter cut-through traffic on Presidio surface streets in accordance with the Presidio Master Plan.
- d. Apply mitigation funding from the project to local alternate project to install a bike, pedestrian, and maintenance path on the West Span of the San Francisco-Oakland Bay Bridge, a corridor adjacent to dense population centers and where no current non-motorized access exists.

We are hopeful that additional alternative transportation and recreational enhancements can be made during the detailed design process and we will continue to offer our support and input towards the goal of providing world-class bike facilities in an urban park

Sincerely,



Andy Thornley
Program Director
San Francisco Bicycle Coalition

3
Cont

4

5



Comments on the Doyle Drive Project DEIS/R

Reviewer: San Francisco Bicycle Coalition (SFBC)

Reviewer's Comment Number	Response	Database ID
1	Preference for Alternative 5 noted.	1292
2	The project incorporates the current Presidio Trust Bikeways and Trail plan to provide bike lanes on Girard Road which is extended to Marina Boulevard under the Preferred Alternative.	1293
3	Preference for Circle Drive Option noted.	1294
4	The Authority will continue to actively involve the community, interested parties and agencies during the design process and refinement of Context Sensitive Design Solutions.	1295
5	The restoration of the project area, including bike paths will be coordinated with the Trust and their Bikeways and Trails Mater Plan. The mitigation measures for the project are presented in Chapter 3 of the EIS/R. The mitigation measures are designed to address specific project related impacts.	1296

1. SPUR supports Michael Painter's Presidio Parkway (Alternative 5)

1

The Presidio has magnificent scenic, natural and cultural resources to be protected. But Doyle Drive is not one of them. It's ugly, unsafe and dangerous, and was built to army specifications which are now incompatible with a national park—even one which honors its military past.

The Presidio Parkway is the only alternative which meets the objectives of the Project. The San Francisco Board of Supervisors called for a parkway design in 1993, the National Park Service in 1994, the Doyle Drive Intermodal Study in 1996, and the Presidio Trust in 2002. Alternative 2 is a freeway, taller and twice as wide as what we now have, insuring that increasing numbers of people driving to work, live or play in the Presidio will be forced to use neighborhood streets to access the park, as they do today.

2. SPUR supports the Circle Drive option

At the Eastern end of the Project there are two great sites, the Palace of Fine Arts and the Presidio national park. People want to see and enjoy both of them. But for 70 years, Doyle Drive has been a physical and visual barrier between them.

Before that, the Presidio and the Palace were united, as sites of the 1915 Panama Pacific International Exhibition which celebrated the rebirth of San Francisco from the earthquake and fire.

That unity was foremost in the mind of the great landscape architect Lawrence Halprin, when he created the stunning new park sweeping towards the Palace from the Letterman Digital Arts campus. It was also a goal of the

SPUR's objectives have been to reunite the Presidio and the Palace, to lessen impacts on the Palace, to provide a magnificent Presidio entry, to minimize traffic in the neighborhoods and the park, and to provide an intermodal transit connection that is convenient to the Palace and the Presidio. SPUR believes that Circle Drive best meets those objectives.

2

The Diamond takes cars bound for the Presidio on a freeway-style off ramp, past much of the length of the Palace. This adds the equivalent of nearly two lanes of road width and extends the third northbound lane 722 feet farther north. The result is to bring traffic closer to the Palace, and to create a dangerous weave between buses entering Doyle Drive from their stop in the northbound bus bay, and cars moving to the right to the exit ramp. That situation is further complicated by the dropped right lane, just north of the exit ramp.

Circle Drive separates Palace and Presidio traffic at the Palace's south end. It is 57 percent narrower than the Diamond along Doyle Drive's most constrained area.

The Diamond uses a freeway-style off ramp, visually signaling to drivers that they're entering a freeway, instead of a moderate speed parkway. Circle Drive provides a more gentle exit which visually says, you're entering a national park.

We think about 500 of the 1,500 cars going to Letterman will be coming from San Francisco. Under the Diamond design, each of those hundreds of cars a day will have to make a nearly 1/2 mile long loop to the north, in order to enter the Letterman garage. Circle Drive brings them to the garage almost directly. In addition, the Diamond design requires two signalized intersections on Girard Rd. whose left turn sequences will delay morning rush traffic from Doyle which is exiting to Marina Blvd. The result is an incentive for drivers with options to use Richardson Ave. instead, which unbalances the needed split to handle the traffic load on both streets.

Circle Drive would allow bus bays on the far sides of the new intersection, with room for Golden Gate Transit and Muni. The PresidiGo shuttle would be able to pick up passengers from both sides of Circle Drive, creating a true intermodal transit connection for visitors to the Palace and the Presidio.

In complex projects, nothing is free. The impact of Circle Drive is that it means removal of Building 1151, the pool, which was built in the very last year of the Presidio's 169 year period of historic significance. Removal must require compliance with historic preservation regulations, and that the Doyle Drive project pay for the replacement of the building and its use, elsewhere in the Presidio. We think most Y members would find a new aquatic center near the main Presidio YMCA more convenient.

The visual result of Circle Drive would be a truly spectacular reconnection of the Presidio and the Palace of Fine Arts. It would also provide an entry to the Presidio that would draw visitors in through an historic area with a view into the recreation area of the Letterman park, then lead them to a natural area with stunning scenic vistas. History, recreation, nature, scenery. Those were the reasons the Presidio was saved as a national park. What an incredible experience that would be for neighbors and visitors!

View to west if Bldg. 1151 is removed.

3. SPUR supports closure of the link between Gorgas Ave and Lyon St. under the Circle Drive option

3

While the connection should be maintained for emergency vehicles, it should be closed to other through traffic so that drivers are not tempted to use Gorgas as a shortcut to bypass traffic on Richardson.

4. SPUR supports continued refinement of the Parkway designs and details.

4

SPUR regards the DEIS/R as the starting point for final design. Michael Painter and others have made many important improvements to the EIS concept designs. That process, which involves agencies, transportation officials, neighbors, civic groups must be continued past the close of public comments. Issues currently include, but are not limited to, shadowing of the potential marsh expansion/ Tennessee Hollow connection and some historic preservation matters. SPUR thanks the SFCTA for its commitment to this continuing process.

5. SPUR supports the hook ramp option at the Highway 1 interchange

5

After preliminary engineering and environmental evaluation, it became obvious that the Loop Ramp has many failings: it would be far more costly, takes park land and trees unnecessarily, and would be too visible from Crissy Field. Furthermore, careful attention to the Hook Ramp design its reduced its impact historic buildings.

6. SPUR opposes the Merchant Road slip ramp

6

The slip ramp would add another lane to the width of Doyle Drive, plus the width of inside and outside shoulders. It would require the removal of four residences (Buildings 1253-1256) on Armistead Road, the removal of a line of trees, and the taking of more than an additional acre of park land. The new design for the Highway 1 interchange adds sight distance and eases the weave which is the reason for the slip ramp proposal.

7. SPUR supports modern traffic management systems

7

In 1996, the Doyle Drive Intermodal Study strongly demonstrated that Doyle Drive is a critical link in the regional highway system. Were Doyle Drive to be closed, the Golden Gate Bridge would be out of operation or severely constrained, and the traffic impacts would be felt from Santa Rosa to the East Bay to San Jose.

In addition to recommending the reconstruction of Doyle Drive, the Intermodal Study called for its replacement to have modern traffic management systems, including an extension of the video monitoring of traffic that is on the Golden Gate Bridge, and other electronic devices that would allow for better and safer management of the roadway. SPUR supports the conclusions of the Intermodal Study, and recommends that the Doyle Drive project include modern traffic management systems including video monitoring, electronic signing and lane controls.

8. Give Credit to Michael Painter

8

Without Michael Painter, there would not be a Presidio Parkway design that the public and responsible agencies would have been able to agree upon. However, he was not credited in the Draft Environmental Impact Statement/Report. SPUR asks that this embarrassing oversight be corrected in the Final EIS/R.

9. Visual representations.

9

In general, the Visual Impact Assessment fails to show the visual differences of the alternatives, and their impacts. Photographs were taken from the wrong locations, sometimes of the wrong side of the project, and with the wrong lens. SPUR will provide specific examples to the EIS team on request.

SPUR thanks the SFCTA and the project team for the opportunity to comment on this major project in a national park at the Golden Gate.

/s/

Jim Chappell
President

/s/

Michael Alexander
Chair, Doyle Drive Task Force



Comments on the Doyle Drive Project DEIS/R

Reviewer: SPUR

Reviewer's Comment Number	Response	Database ID
1	Comment noted.	1385
2	Support for the Circle Drive Option noted.	1386
3	Comment noted.	1387
4	The Authority has made the commitment to continue an open dialog with all project stakeholders throughout the completion of this project. This includes agency and citizen advisory committees, public meetings, living room briefings, project website and published media.	1388
5	Preference for the Hook Ramp option noted.	1389
6	Opposition to the Merchant Road Slip Ramp option noted.	1390
7	Comment noted.	1391
8	Mr. Painter is credited in the FEIS/R.	1392
9	The visual assessment follows the format and content guidelines provided in FHWA's Visual Impact Assessment for Highway projects. The viewpoints that were used for the analysis were selected in consultation with the Trust, National Park Service, Caltrans and SFCTA.	1393



San Francisco Tomorrow

Since 1970, Working to Protect the Urban Environment

March 31, 2006

REC'D MAR 31 2006

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

Subject: Doyle Drive DEIS/EIR Comments

Dear Mr. Saage:

The main problem with the alternatives chosen is that the emphasis seems to be on moving vehicles not on moving people. The DEIS/EIR projects future traffic growth on Doyle Drive, connecting roadways and city streets and the Golden Gate Bridge and apparently assumes it will all be automobiles. Insufficient study has been made of the possibility of moving more people on public transportation – buses and ferries. It projects more traffic on the Golden Gate Bridge. Is this a prelude to another attempt to put a second deck on the bridge? This is something citizen activists have fought and beaten back in the past. It would be extremely undesirable because it would generate alleged reasons to widen this roadway even more and because of the effect it would have on the neighborhoods into which this traffic would be dumped.

San Francisco citizen activists have been struggling for years to prevent an eight lane freeway being built as a replacement for Doyle Drive. The designs presented in this document make it all too easy to do this in the future. It is noted in the DEIS/EIR that an act of the state legislature says that Doyle Drive can not exceed six lanes without permission of the San Francisco Board of Supervisors. However a future legislature that is not familiar with the background and reasons to this act could repeal it. One of the problems with term limits is a loss of history and reasons for certain pieces of legislation.

Several things about the proposed design are very disturbing.

The proposed seventh lane from Park Presidio Drive to the Marina junction is one. It is allegedly a merging lane. It is about 4200 feet in length. It is very questionable that a lane this length is required for merging. 500 feet or even less would seem more appropriate if this lane is really meant for merging only. As proposed now it is effectively another full traffic lane and is an increase in roadway capacity. This lane should be shortened so that it will not be an additional traffic lane.

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The proposed lane and shoulder widths are disturbing. They are wide enough that minor changes in the striping of the roadway would increase the roadway to eight lanes. In order to prevent this, the design should be modified so that the shoulders are discontinuous. Doing this would prevent the addition of an eighth lane. The alleged reason for this wide shoulder is to enable disabled vehicles to get out of the way of moving traffic. Having frequent pullouts rather than a continuous shoulder that is in effect a continuous lane would accomplish the same thing and eliminate the possibility of it becoming another traffic lane. A design with narrower lanes should be analyzed. It should also be noted that narrower lanes will result in lower speeds on this roadway and therefore a safer transition from freeway speeds to city street speeds when vehicles leave this freeway.

3

We can anticipate an argument that the proposed roadway is in accordance with state highway standards. Highway designers must realize that there is a difference between roadway requirements in rural areas and in densely populated cities. Designs that may be appropriate for the flat wide open spaces of the Central Valley are not appropriate for San Francisco.

4

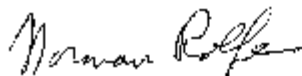
The EIS/EIR should not be certified until:

- 1) alternative designs that are in accordance with the above comments are made and analyzed,
- 2) a complete study is made of ways to increase use of public transportation in order to remove the perceived need for increased roadway capacity.

5

Please address correspondence on this matter to Norman Rolfe, Transportation Chair, San Francisco Tomorrow, 2233 Larkin Street #4, San Francisco, CA 94109
phone/fax 415-775-9167, normrolfe@juno.com

Very truly yours



Norman Rolfe, Transportation Chair



Comments on the Doyle Drive Project DEIS/R

Reviewer: San Francisco Tomorrow

Reviewer's Comment Number	Response	Database ID
1	The SFCTA travel demand model forecasts changes to all mode choices based on a series of complex forecasting formulae and assumptions.	1347
2	The seventh lane is required to accommodate the downstream traffic at Marina/Girard off-ramp.	1348
3	The proposed continuous useable outside shoulder is the minimum needed to address traffic safety while minimizing the facility footprint. In addition the proposed facility will have reduced lane widths and reduced design speed where appropriate as documented with the extensive number of design exceptions approved for the project.	1349
4	This is why context sensitive design is being implemented with the project. However, Caltrans safety standards must be maintained as this is a state owned facility. The Authority, Caltrans and FHWA have made great efforts to minimize the footprint of the facility while meeting the project purpose of seismic, structural and traffic safety as indicated by the application of project specific parkway design criteria. The facility has reduced lane widths, continuous shoulders to meet minimum safety requirements, while the auxiliary lane between Veterans Blvd and Girard road is needed to maintain adequate traffic operations. The parkway design is documented through the approval of extensive design exceptions.	1350
5	As mentioned in the preceding comments, context sensitive design is being implemented (see Section 2.2.3) with the project while maintaining Caltrans safety standards. The proposed project does not increase roadway capacity it is about replacing an existing roadway facility while improving the seismic, structural and traffic safety on Doyle Drive. Any studies regarding ways to increase the use of public transportation is beyond the scope of this project.	1351

March 31, 2006

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

Re: Comments of Doyle Drive DEIS/DEIR

Dear Mr. Saage,

Transportation for a Livable City (TLC) is a nonprofit membership organization dedicated to making San Francisco more livable by fostering complete streets and vital neighborhoods. We strongly support the idea to replace the ugly, spindly, unsafe Doyle drive with a Presidio Parkway (Alternative 5), and salute Michael Painter for his dedication to sensitively integrating this project into its national park setting, respecting the natural and historic values of the park in the design, and transforming this project into a multimodal project which integrates walking, bicycling, and public transit while minimizing the impacts of traffic on the park.


- We cannot emphasize strongly enough that this project must be designed as a *parkway*, not a *freeway*. Parkways are designed to move traffic at moderate, not excessive, speeds, and well-designed parkways integrate scenic and natural values of the setting into the experience of movement without overwhelming or degrading the setting. The Presidio Parkway calls for context-sensitive design, not a set of freeway specifications plucked from a highway engineering manual. Context-sensitive design may call for narrower traffic lanes than a conventional freeway, in order to encourage moderate speeds and reduce the impact of the road on the landscape. We urge the Transportation Authority to continue to work with Caltrans to remain true to the parkway concept through final design and engineering. In addition, context-sensitive design will enhance bicycle and pedestrian circulation along and around the parkway.
- Traffic volumes, and their attendant degradation of the natural park setting, can be reduced significantly by enhancing sustainable transportation modes (walking, bicycling, and public transit). We would especially like to see additional study of improving public transit service in the study corridor; and new traffic projections based on a transportation plan that emphasizes sustainable modes. Enhanced connections and designs for accommodating Muni and Golden Gate Transit buses and any internal park shuttles, with appropriately sited transit hubs, should be incorporated into the plan.
- No parking should be included as part of the project, as expanding parking serves only to increase vehicle trips, and the attendant environmental degradation.

Transportation for a Livable City
995 Market Street Suite 1550
San Francisco, CA 94103
415.344.0489
www.livablecity.org

- We are glad to see that the Presidio Parkway design has tried to accommodate the proposed expansion of the Crissy Field wetlands, and restoration of Tennessee Hollow and El Polio Creek. The design should continue to be refined so as to maximize the potential for environmental restoration.
- We support the hook ramp option at the Highway 1 interchange, as it is less costly than the loop ramp option and does less harm to the park than the loop ramp.
- The proposed seventh lane from Park Presidio Drive to the Marina junction should be shortened to assure that it functions as a merging lane only and will not serve as an additional traffic lane.
- We oppose the Merchaut Road slip ramp, as it provides only marginal benefits to traffic movement at a cost of great harm to the park.
- We support the Circle Drive option, as it provides much better pedestrian, bicycle, and public transit connections between the Palace of Fine Arts, Crissy Field, and the Presidio.
- In conjunction with the Parkway alternative, bicycle lanes, with lane cross-overs at right turn conflicts, should be installed on the new extended Girard Street, since this will be the most direct route from Marina Blvd/Lyon to and from the Letterman complex and other central post destinations. Cyclists will take this route and should have safe access designed into the new roadway. The Old Mason and Halleck route, which is much longer, could still be used by cyclists who prefer an indirect route with less traffic.
- In light of the fact that there are no tangible improvements to sustainable transportation modes (walking, bicycling, and public transit) included in the \$600- \$700 million project cost, and that the existing walkway on the Doyle Drive structure will be eliminated, we ask that the following mitigation measures be included in the Final EIR to provide for improved access for non-motorized transportation:
 - Reconfigure the uphill portion of Crissy Field Ave from Mason St to Lincoln Blvd. into a two way bike way and pedestrian path with emergency vehicle access only. Cars from Crissy Field and the Presidio Post area should be directed to the new parkway via Girard or alternate routes as needed.
 - Install a wide multi-use path along the East side of Lincoln Blvd or other improved configuration along Lincoln between the junction of Crissy Field Blvd and Vista Ave. This is currently a heavily used, yet dangerous and uninviting corridor.
 - Study and install other traffic diversion or calming measures to further discourage commuter cut-through traffic on Presidio surface streets in accordance with the Presidio Master Plan.

We hope that the above comments are helpful in creating a Presidio Parkway that will do justice to its extraordinary setting, and set a new standard for the design of future multimodal transportation projects.

Sincerely,


Tom Radulovich
Executive Director



Comments on the Doyle Drive Project DEIS/R

Reviewer: Transportation for a Livable City

Reviewer's Comment Number	Response	Database ID
1	Support for Alternative 5 noted.	1458
2	Comment noted.	1459
3	Existing transit service is currently fully utilized and works with the Presidio Shuttle. The Preferred Alternative includes extended bus bays on both sides of Richardson Avenue (see Section 2.5.4). The extended bus bays will provide safer merging capability for the buses and will facilitate transfers between Golden Gate Transit, Muni and PresidiGo vehicles.	1460
4	Comment noted.	1461
5	Comment noted.	1462
6	The restoration of the project area, including bike paths will be coordinated with the Trust and their Bikeways and Trails Mater Plan.	1463

From: David Schonbrunn [David@Schonbrunn.org]
Sent: Wednesday, March 01, 2006 12:35 PM
To: doyledrivecomments@sfcta.org
Subject: TRANSDEF's comments

TRANSDEF participated in the Citizen's Advisory Group several years ago, and supports the Parkway alternative. After attending the hearing in the Presidio, we offer the following comments in the spirit of generating and presenting clearly the information necessary to lessen the divisiveness heard that night:

1

For the non-professional, the EIS/R is very difficult to read and comprehend. Clustering the traffic information on the basis of neighborhoods, instead of randomly listing roadway names, would help greatly in the comprehension of the traffic data. Many of the speakers seemed to identify strongly with their neighborhoods, so having an easy way to compare the impacts of the various alternatives on different neighborhoods would be very useful.

2

We think it would be useful for the FEIS/R to contain a matrix that identifies the interests of each of the adjacent neighborhoods.

3

Many of the speakers appeared to have the hidden agenda of seeking to have the Doyle Drive project reduce the cut-through traffic in their neighborhood. That appeared to be the reason so many objected to the introduction of a new traffic light.

4

After developing the requested matrix, the study should identify the impact on traffic volumes and speeds in each of the neighborhoods. Projected travel times through the Doyle Drive Corridor for the various alternatives for am and pm peak and for off peak periods also need to be made prominent. This will hopefully eliminate the hysteria about the new traffic light. In particular, the vehemently protesting speakers seemed to miss the fact that the traffic light would be in place a block before an existing traffic light, thus not creating a major hindrance to traffic.

5

It is our hope that, through clear and simpler presentation of the data using a neighborhood perspective, as described above, a consensus can be achieved on a preferred alternative, thus leaving the funding as the sole remaining problem.

6

--David Schonbrunn, President
Transportation Solutions Defense and Education Fund (TRANSDEF)



Comments on the Doyle Drive Project DEIS/R

Reviewer: TRANSDEF (Schonbrunn, D.)

Reviewer's Comment Number	Response	Database ID
1	Preference for Alternative 5 noted.	1562
2	Comment noted and will be considered for future traffic studies.	1563
3	Although the comments are not separated by specific neighborhood, a summary of the comments received during the formal review process is provided in Appendix E of the FEIS/R. Many themes which emerged from these comments were addressed through public outreach prior to the completion of the FEIS/R and it also reflected in the appendix. Appendix L provides all the comment letters and responses.	1564
4	Comment noted.	1565
5	The project proposes no changes to this area. This area was included in the expanded traffic study which demonstrated no impacts from the project.	1566
6	In July 2006, Alternative 5 with the Diamond Interchange option was chosen as the Preferred Alternative.	1567



Urban Watershed Project

3229A Clement Street
San Francisco, CA 94121
(415) 828-2622
dougkern@sbcglobal.net

March 31, 2006

Mr. 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:

Thank you for the opportunity to comment on the DEIS/R on the South Access to the Golden Gate Bridge – Doyle Drive. The Urban Watershed Project (UWP) appreciates the efforts of Project Team members to meet with members of the Presidio natural and cultural resources community during this comment period and to respond to specific requests for information and assistance. We appreciate the efforts of Michael Painter and his project vision. We also appreciate the time-extension of the comment period.

UWP recognizes the need for repairing the South Access to the Golden Gate Bridge and at the same time understands the special nature of the National Park lands that the project spans. In particular, the Tennessee Hollow restoration project is perhaps the most important large-scale natural restoration project within the Presidio and its orientation perpendicular to Doyle Drive creates difficult challenges. UWP respectfully suggests the extra effort the Doyle Drive project team takes now in creatively integrating the Tennessee Hollow stream and habitat corridor will leave a lasting positive impression on visitors and the drivers for decades to come. UWP has confidence that project team designers understand the need to integrate the vision of Tennessee Hollow into the final design.

UWP, along with the Presidio Environmental Council, supports Alternative number 5, as most recently described by Michael Painter on March 22, 2006, with some caveats.

UWP acknowledges Mr. Saage's comments encouraging the National park Service and the Presidio Trust to develop a Tennessee Hollow/Crissy Marsh design so that Doyle Drive can appropriately include these features. We are particularly encouraged by his offer to build the marsh expansion/riparian corridor extension, if the design is ready by 2009. UWP recommends this design process be well coordinated and integrated with your own design process or else much greater delay is possible. UWP recommends the appointment of a design coordinator from your team to direct this complicated and

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challenging multi-faceted project.

Among the most difficult challenges remaining for Doyle Drive and its intersection with Tennessee Hollow/Crissy marsh are the specific road crossings and their impacts.

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Cont

- UWP appreciates the efforts to spread ramps and roadways apart to allow for more sunlight to penetrate to the habitat corridor and marsh.
- Please develop designs that consider the impacts of shading under spans during the day. The Tennessee Hollow project will ultimately cost many millions of dollars and the area where it enters the marsh is a very sensitive and rare habitat area. Develop an award winning parkway design that fully incorporates the riparian system as it enters the marsh, even though a major roadway with off-ramps is running through this ecologically crucial transition zone.
- Investigate and include the use of translucent materials in the roadways or along the shoulders to allow light to penetrate.
- Investigate and include large lengths or spans of roadway without piers or abutments in the habitat zone.
- Investigate and appropriately design for the birds flying near the parkway as it crosses over Tennessee Hollow to minimize impacts.
- At night, we expect that certain types of lighting may attract insects and therefore, birds to the parkway as it crosses Tennessee Hollow/Crissy Marsh. Please design night lighting to minimize these potential conflicts.
- Roadway noise is anticipated to be an impediment to pedestrian and wildlife enjoyment nearby the parkway. UWP recommends that the Doyle Drive team continue to reduce vehicle speeds in this area around riparian corridor/marsh expansion, so the roadway noise itself does not become the focal point.
- Roadway runoff is a difficult and important challenge. Roadway runoff can add a toxic shock to ecological systems after several months of buildup. UWP suggests that regular roadway cleaning and treatment of runoff prior to discharge into local waters may make the most sense from a watershed perspective, rather than discharging to the sanitary sewers, resulting in much greater contamination to the Bay from combined sewage overflows (CSOs.)
- With the caveat of runoff treatment, possibly through the use of a local treatment wetlands, allow local infiltration to maintain groundwater hydrology in the marsh and stream corridor areas.
- Allow for human pedestrian and bicycle travel in the marsh/riparian zone near the Doyle Drive crossing as the vision for Tennessee Hollow is one where visitors may walk along the marsh and then up into the riparian corridor, eventually to the headwater springs. A careful design will include this very important ability for humans to view the wildlife corridor and its inhabitants along its entire length.
- UWP recommends that an adaptive management approach be incorporated into design elements involving natural resources. We should expect the unexpected and allow for open reporting and communication of eventual problems so that they me addressed rapidly.

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- UWP recommends that post-construction monitoring and reporting procedures be developed to receive comments on an ongoing basis as unexpected project impacts occur. 13
- UWP recommends that the Doyle Drive team continue to actively involve community members during the design process. UWP would like to be invited to participate in ongoing design considerations particularly with respect to the marsh, and riparian corridors. 14

UWP is greatly encouraged by the openness and willingness to integrate community concerns into the project. We consider the Doyle Drive design effort to be a work-in-progress with major hurdles being overcome regularly. We respectfully request to be invited to participate in the process throughout the construction phase of the project. 15

Thank you again for the opportunity to comment on this important document. If you have any questions or would like to contact me, please call (415) 828-2622, or by email at dougkern@sbcglobal.net.

Sincerely,

Doug Kern
Executive Director
Urban Watershed Project



Comments on the Doyle Drive Project DEIS/R

Reviewer: Urban Watershed Project

Reviewer's Comment Number	Response	Database ID
1	Comment noted.	1258
2	Comment noted.	1259
3	Comment noted.	1260
4	The project team is coordinating the design of the facility as well as the proposed marsh restoration under the facility with the participating agencies.	1261
5	The project team continues to look for shade reducing design details in coordination with Caltrans, the Trust and GGNRA	1262
6	All efforts are being made to avoid conflicts with sensitive habitats and further refinements to the roadway will be part of detailed design process. The facility will be designed to be above the 100-year flood zone while the detailed design will be coordinated with the Trust once marsh restoration plans are developed.	1263
7	This is part of detailed design. Workshop held on 3/22/06 identified proposed design enhancements and recommendation were made as to the types of plants which should be planted below the structure.	1264
8	Streetlights will be designed to minimize glare along the facility including at-grade and elevated portions of the roadway.	1265
9	In addition to containing the facility in a tunnel where it runs closest to the marsh, the project team has proposed to investigate and incorporate alternative paving materials and absorptive tunnel linings to minimize road noise in addition to ongoing application of traffic calming strategies.	1266
10	It should be noted that under the existing condition, none of the runoff from the roadway is treated prior to discharge. Therefore, under either Option 1 or 2 described in the FEIS/R (Section 3.3.1), there would be a net benefit to receiving water quality because the runoff will be treated. Runoff from nearly the entire City flows into the combined sewer system and is treated at one of the City's treatment plants. The FEIS/R allows for either discharge to the sanitary sewer system or for on-site treatment measures in accordance with the Caltrans Storm Water Management Plan (which is regulated by the Regional Water Quality Control Board).	1267
11	The project will continue to coordinate with the Trust and GGNRA as they developed the design of the marsh restoration.	1268



Comments on the Doyle Drive Project DEIS/R

Reviewer: Urban Watershed Project

Reviewer's Comment Number	Response	Database ID
12	While the project is being implemented, the monitoring program provides this kind of situational response. Over the longer, post-project period, the EIS/R commits to long-term assessment of the success of restoration, with contingency plans, in a manner similar to adaptive management. The term is used in this context in the Avoidance, Minimization and/or Mitigation Measures portion of Section 3.4.1.	1269
13	See response to Comment 1269	1270
14	The Authority will continue to actively involve the community, interested parties and agencies during the design process.	1271
15	The Authority will involve the community, interested parties and agencies throughout the construction phase of the project.	1272



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strong families, strong communities.

March 31, 2006

Leroy L. Saage, PE
Doyle Drive Project Manager
San Francisco County Transportation Authority
100 Van Ness Avenue
San Francisco, Ca 94102

Re: Doyle Drive DEIS/DEIR

Dear Mr. Saage:

The YMCA of San Francisco is a tenant of the Presidio Trust in two locations within the Presidio: a site at the intersection of Funston Avenue and Lincoln Boulevard ("Main Post Facility") where we operate a gymnasium and fitness facility, and a site on Gorgas Avenue northwest of the intersection with O'Reilly Avenue ("Letteman Facility") where we operate a gymnasium and aquatics facility.

In this capacity, we express strong preference for the Presidio Parkway (Alternative V) as described in the DEIS/DEIR. This alternative will preserve and enhance the circulation, environmental character and sight lines of the Main Post area of the Presidio far better than either of the other two alternatives. This alternative also provides the added benefit of a direct and landscaped pedestrian connection between the Main Post Facility and the Crissy Marsh, where we conduct recreation and environmental education activities.

With regard to the access options at the eastern end of Doyle Drive, we prefer the Circle Drive Option to the Diamond Interchange Option, even though it will require the relocation of a portion of our Letteman Facility, namely the swimming pool we currently operate at that location. Assuming that the relocation of that facility can be at least partially funded as part of the cost of the overall project, the preservation of sight lines between the Lucas Arts Letteman campus and the Palace of Fine Arts is an overriding consideration.

Respectfully submitted,

YMCA of San Francisco

William Worthington

Vice President, Property Development





Comments on the Doyle Drive Project DEIS/R

Reviewer: YMCA of SF

Reviewer's Comment Number	Response	Database ID
1	Preference for Alternative 5 noted.	1206
2	Preference for the Circle 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.	1207

