THE PRESIDIO TRUST
BOARD OF DIRECTORS

RESOLUTION 02-19
CONSIDERATION AND ADOPTION OF THE PRESIDIO TRUST MANAGEMENT PLAN: LAND USE POLICIES FOR AREA B OF THE PRESIDIO OF SAN FRANCISCO (PTMP)

WHEREAS, Title I of P.L. 104-333 (Trust Act) created the Presidio Trust and charged it with managing the portion of the Presidio transferred to its administrative jurisdiction (Area B); and

WHEREAS, in 1994, prior to enactment of the Trust Act and creation of the Presidio Trust, the National Park Service finalized and adopted the General Management Plan Amendment (GMPA), a comprehensive plan for the Presidio; and

WHEREAS, the Presidio Trust wished to prepare an update to the GMPA that reflects the Trust Act authorities, Presidio Trust management policies, and changes in circumstances and new opportunities since the GMPA was adopted; and

WHEREAS, the Presidio Trust initiated a public planning and environmental review process pursuant to the National Environmental Policy Act (NEPA) in July 2000 during which the Presidio Trust developed alternative plan options, issued a Draft Plan and Draft Environmental Impact Statement, invited public participation and considered public comment throughout the process, and issued a proposed Final Plan, Final Environmental Impact Statement (EIS), and responses to public comments on May 24, 2002; and

WHEREAS, based upon a thorough analysis of the alternatives and their potential environmental consequences, consideration of all public and agency comments received during the NEPA process and the rationale set forth in the Record of Decision (ROD), and in consideration of the mandate of the Trust Act and the entire agency record, the Presidio Trust Board of Directors proposes to adopt the Final Plan Alternative, analyzed in the Final EIS and fully set forth in the separate volume, *Presidio Trust Management Plan: Land Use Policies for Area B of The Presidio of San Francisco (PTMP)*, as the plan to guide future management and implementation of projects within Area B;

NOW, THEREFORE, BE IT RESOLVED, that the Presidio Trust Board of Directors hereby approves and adopts the PTMP as the Presidio Trust's management plan and authorizes the Presidio Trust's Executive Director to execute the ROD memorializing the Board of Directors' decision.

Adopted: August 23, 2002

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LIST OF ACRONYMS

ACHP Advisory Council on Historic Preservation
ADA Americans with Disabilities Act
AMA/MP Archaeological Management Assessment and Monitoring Program

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AMP	Archaeological Management Plan
BCDC	San Francisco Bay Conservation and Development Commission
BMPs	Best Management Practices
CAP	2000 Clean Air Plan
CCSF	City and County of San Francisco
CEQ	Council on Environmental Quality
dBA	A-weighted decibels
DPT	San Francisco Department of Parking and Traffic
EA	Environmental Assessment
EPA	U.S. Environmental Protection Agency
ESA	Federal Endangered Species Act
Final EIS	Final Environmental Impact Statement, Presidio Trust Management Plan
FMP	Financial Management Program
FPO	Presidio Trust Federal Preservation Officer
FY	fiscal year
GGBHTD	Golden Gate Bridge Highway and Transportation District
GGNRA	Golden Gate National Recreation Area
GGT	Golden Gate Transit
GIS	Geographic Information System
GMP	General Management Plan/Environmental Analysis
GMPA	Final General Management Plan Amendment
LDAC	Letterman Digital Arts Center
LOS	Level of Service
MEP	Monitoring and Enforcement Program
MUNI	San Francisco Municipal Railway
NEPA	National Environmental Policy Act of 1969
NHLD	National Historic Landmark District
NHPA	National Historic Preservation Act
NPS	U.S. Department of the Interior, National Park Service
NR	National Register
OWPCP.	Oceanside Water Pollution Control Plant
PA	Programmatic Agreement
PAR	Planning Association for the Richmond
PHSH	Public Health Service Hospital
PM_{10}	particulate matter
Presidio	Presidio of San Francisco
PRV	Pressure Regulating Valves
PTMP	Presidio Trust Management Plan
FPO	Presidio Trust Federal Preservation Officer
ROD	Record of Decision
sf	square feet
SFB	San Francisco Beautiful
SFHAC	San Francisco Housing Action Coalition
SFPUC	San Francisco Public Utilities Commission
SFUSD	San Francisco Unified School District
SHPO	State Historic Preservation Officer
TCMs	Transportation Control Measures
TDM	Transportation Demand Management
Trust Act	Presidio Trust Act
Trust	The Presidio Trust
USFWS	U.S. Fish and Wildlife Service
USPP	U.S. Park Police
VMP	Vegetation Management Plan

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PRESIDIO TRUST MANAGEMENT PLAN
FINAL ENVIRONMENTAL IMPACT STATEMENT

The 1994 GMPA vision gave the Presidio a noble purpose and captured the imagination of the local public. Because it relied on ongoing taxpayer support, Congress ultimately deemed the 1994 GMPA to be "unrealistic." H.R. Rep. No. 234 at 10, 104th cong., 1st Session (1995).

The Presidio Trust Management Plan owes much to the 1994 GMPA, but proposes a more focused and realistic vision: the preservation of the Presidio's cultural, natural, scenic, and recreational resources for the American people.

> The Presidio is the legacy of the generations who lived here and cared for this post. That legacy will be carried forward with the same spirit. The Trust envisions the Presidio as a home to an enduring community, where people from the public, private, and non-profit sectors come together and share their ideas and resources; where artists, scientists, and storytellers pursue their passions; where families play together; where visitors deepen their understanding of this nation's social history and of the connections between human and natural history; and perhaps most important, where an individual, alone or in concert with others, can find peace of mind and personal inspiration.
> (PTMP, page v).

The Presidio Trust (Trust) has prepared this Record of Decision (ROD) for the *Final Environmental Impact Statement, Presidio Trust Management Plan, Land Use Policies for Area B of the Presidio of San Francisco* (Final EIS). The Final EIS is a programmatic Statement and supplements the 1994 *Final General Management Plan Amendment Environmental Impact Statement for the Presidio*. The Trust developed the ROD in compliance with agency decision-making requirements under the National Environmental Policy Act of 1969 (NEPA), as amended (42 U.S.C. §§ 4321 *et seq.*), NEPA's implementing regulations promulgated by the Council on Environmental Quality (CEQ) (40 C.F.R. §§1500-1508), and the Trust's supplemental implementing regulations at 36 C.F.R. Part 1010.

The ROD documents the decision and rationale for adopting the *Presidio Trust Management Plan, Land Use Policies for Area B of the Presidio of San Francisco* (PTMP*)* (identified during project scoping and review of draft documents under the name Presidio Trust Implementation Plan or PTIP), and is identified in the Final EIS as the Final Plan Alternative. The ROD also provides background about the Trust and the planning effort, and describes the alternatives considered, public involvement, agency consultation, mitigating measures developed to avoid or minimize environmental impacts of the selected alternative, and use of the Final EIS in subsequent decision making. It also identifies as required by NEPA, the environmentally preferable alternative, and sets forth an evaluation of alternatives and the reasons for adopting the Final Plan Alternative.

RECORD OF DECISION

I. BACKGROUND

The 1,491-acre Presidio of San Francisco (Presidio) is one of the country's great natural and historic sites. Its distinctive resources include its historic architecture and landscapes, unique ecological systems and rare plant communities, inviting parklands, dynamic shoreline, spectacular views and recreational resources. Situated as it is, both within the heavily urbanized San Francisco Bay Area, and at the center of the 77,000 acre Golden Gate National Recreation Area (GGNRA), the Presidio attracts visitors from near and far who take advantage of interpretive programs and exhibits, visit the historic military sites, and enjoy the natural beauty, resources, open space and scenery.

A military garrison for over 220 years, the Presidio has served Spain, Mexico, and the United States of America; it protected commerce, trade, and migration, and — until its closure in 1994 — played a role in every major U.S. military engagement since the Mexican-American War in 1846. Designated a National Historic Landmark District (NHLD) in 1962, the Presidio contains one of our country's finest collections of places, buildings, structures, and artifacts related to military history, and its architecture represents every major period of U.S. military history since the 1850s.

The Presidio includes about 500 developed acres with approximately 770 buildings providing approximately 6.1 million square feet of building space, Presidio-wide. Over half of the Presidio's buildings are historic and contribute to the status of the Presidio as a NHLD. The Presidio contains offices, warehouses, and more than 1,600 residential accommodations in almost 400 buildings. The residential accommodations range from large single-family homes and duplexes, to apartment complexes and barracks. Community and visitor facilities support the residents and employees of various organizations located in the Presidio. Facilities include chapels, a child care center, post office, bank, meeting facilities, retail stores, tennis courts, a bowling center, theater, swimming pool, golf course, gymnasiums and more. The Presidio also has its own electric distribution, telecommunication, water, wastewater collection, storm drain, and refuse collection systems and services.

Dramatic headlands, a favorable climate, rich soils, water resources and protected open space have contributed to the site's rich biological diversity. As the surrounding areas have become more urban, the Presidio has provided critical refuge for plants and wildlife. Rare plant communities that have disappeared in the rest of the San Francisco peninsula survive within the Presidio. These remnant native plant communities preserve rare and endangered plant species and provide valuable wildlife habitat. The habitats include serpentine grasslands where wildflower and grass species flourish; the last remnants of dune communities that once covered what is now the city of San Francisco; and riparian and wetland communities including Lobos Creek, the best example of a native riparian community in the city. The Presidio contains a number of rare plants including Raven's manzanita, which has been saved from extinction through the GGNRA's plant propagation program. Other important natural resources include the still visible drainages at Mountain Lake, Lobos Creek, Tennessee Hollow, and the newly restored tidal wetland at Crissy Field.

The Presidio also provides rare and outstanding recreational resources within a major metropolitan area. It offers opportunities for a wide range of active pursuits as well as places for solitude and retreat. Sites throughout the Presidio provide spectacular vistas of the Pacific Ocean, the Golden Gate, the Marin Headlands, San Francisco Bay, and the skyline of San Francisco. Visitors enjoy walking, jogging, biking, sightseeing, surfing and wind surfing, sailing, fishing, and learning about the Presidio's history and environment. Others participate in an active stewardship program focused on preserving and restoring the park's natural systems.

A. FROM MILITARY POST TO PARK

The Presidio's transition from military post to park began in 1972, when Congress authorized the formation of the GGNRA. In the legislation that established the GGNRA (the GGNRA Act, Public Law 92-589; 86 Stat. 1299; 16 U.S.C. 460bb), Congress mandated that the Presidio would become part of the GGNRA if the Department of Defense ever declared the base to be in excess of its needs. The Presidio was designated for closure on the 1989 Base Closure and Realignment Act list and, in 1994, it was transferred to the U.S. Department of the Interior, National Park Service (NPS).

Following the establishment of the GGNRA in 1972, the NPS prepared and approved in 1980 a General Management Plan/Environmental Analysis (GMP) — a programmatic document that set forth the basic management philosophy for

the national recreation area and Point Reyes National Seashore. In response to the 1989 Presidio closure announcement and pending transfer of ownership, the NPS initiated a supplemental public planning and environmental review effort to update the 1980 GMP with specific management and land use actions for the Presidio. The result of this effort was the final GMP Amendment (GMPA) and corresponding EIS. NPS approved the GMPA in July 1994. The GMPA laid out specific land use plans for 13 distinct planning districts to guide visitor use, cultural and natural resource management, development and operation of the Presidio, and also assured that more detailed site-specific plans/designs with supplemental environmental analysis would be needed during GMPA implementation.

Once the GMPA was in place, difficult questions regarding its implementation were raised. The GMPA vision required that Presidio buildings be leased to "a network of national and international organizations devoted to improving human and natural environments and addressing our common future." This vision gave the Presidio a noble purpose, however the plan came with high operating and capital costs (then projected at $40 million annually and $490-$741 million, respectively). Congress was unwilling to commit the federal monies needed over the long-term to improve, protect, and maintain the Presidio as a global center dedicated to addressing the worlds most critical challenges, and instead created the Presidio Trust (Trust) with a one-of-a-kind mandate to generate the monies needed to preserve and enhance the cultural, natural, scenic, and recreational resources of the Presidio for public use while achieving long term financial sustainability.

B. THE PRESIDIO TRUST AND ITS UNIQUE MANDATE

In 1996, Congress enacted the Presidio Trust Act (Trust Act), establishing the Trust as a wholly-owned federal government corporation to transform the former military post into a financially self-sufficient national park by the year 2013 and to protect and preserve its natural, historic, scenic, and cultural and recreational resources for public use in perpetuity. Congress divided the Presidio into two areas: Areas A and B. Area A, which encompasses the coastal areas and Building 102 (about 20 percent of the land area of the Presidio), remained under NPS jurisdiction. On July 1, 1998, jurisdiction and management of the 1,168 acre interior portion (Area B) of the Presidio, containing the vast majority of buildings (730 buildings with 5,960,000 square feet of building space) and 80 percent of the land area, was transferred from the NPS to the Trust.

Many of the Trust Act requirements for management of Area B differ significantly from those the NPS must meet in managing property under its administrative jurisdiction, including most notably the requirement that the Trust generate sufficient revenues to undertake all required capital improvements and to fund park operations without annual federal appropriations starting in 2013. The differences, along with other changes in circumstances since the GMPA was adopted in 1994, prompted the Trust to reexamine the land use plan (i.e., the GMPA) for Area B. The Trust, in consultation with the public and other agencies, determined that the best way to undertake this needed review and update would be through a public planning and environmental review process. The Presidio Trust Management Plan (incorporated herein by reference) and the Final EIS, including public and agency comments on the Draft EIS and Draft Plan, encompass the results of that effort.

An updated management plan for area B of the Presidio under the Trust's jurisdiction is a critical next step towards meeting the Trust's congressional mandates. For more than two years, while preparing the Plan, the Trust voluntarily refrained from new long term leasing, and completion of the planning process will remove that voluntary constraint. Renewal of long term leasing, in conformance with an overall management plan for the Presidio, is an absolute necessity if the Trust is to begin again to attract tenants and investors willing to assume the substantial costs of rehabilitating the Presidio's historic structures and to meet the Congressionally required financial goals and year 2013 deadline. Without completion of an updated management plan, frequent, time consuming amendments of the 1994 GMPA would be required, slowing the pace of achieving both financial and resource protection needs. In addition, the current plan would not as clearly reflect updated information and changes in circumstances since 1994, including the departure of the 6th U.S. Army, prior decisions regarding the Letterman Hospital site, and requirements of the 1996 Trust Act, including for example the Trust Act's tenant selection criteria and the requirement that the Trust become financially self sufficient by fiscal year (FY) 2013.

RECORD OF DECISION

II. DECISION (SELECTED ACTION)

The Presidio Trust Board of Directors, through this ROD and the attached Board of Directors' Resolution No. 02-19, adopts the *Presidio Trust Management Plan; Land Use Policies for Area B of the Presidio of San Francisco* (PTMP or Plan) as the updated management plan for Area B of the Presidio. The selected action is identified as the Final Plan Alternative within the Final EIS, and is chosen after a lengthy and thorough analysis of the alternatives and their potential environmental consequences, consideration of all public and agency comments received during the NEPA process, the complete record of the Trust, the mandates of the Presidio Trust Act, and other considerations described in this ROD.

The PTMP will ensure that the Presidio remains a great national park site, and proposes to dramatically expand open space in the park and decrease the amount of building space over time. In total, 100 additional acres of open space will be created, mostly in the southern section of the park, and 360,000 square feet or more of building space will be eliminated. Within the building space that remains, the PTMP calls for a balance of uses, with about one third of the buildings being used for housing, one third for office, and one third for public-serving uses. The amount of future housing will not exceed the current amounts, and people who work in the park will continue to receive housing preference, as a way to reduce automobile travel in and out of the park. New office users will generally be small businesses or organizations, as the type of office space available will not appeal to large commercial enterprises that typically locate in the central business district or suburban business parks. Public-serving uses will include cultural and educational uses (e.g., museums and exhibition space, public or private schools and learning centers, historic sites, performing arts venues), recreation, small-scale lodging and other amenities for park visitors.

Planning principles included in the PTMP express the Trust's commitments to preserve and enhance the cultural, natural, recreational, and scenic resources of the Presidio, including commitments to preserve the NHLD, to increase native habitats, and to pursue the long term health of Crissy Marsh, a recently restored tidal wetland. Planning principles also express the Trust's desire to provide for a wide array of public uses and programs, many in partnership with the NPS, park tenants, and others, with the goal of bringing people to the park to understand, enjoy, and appreciate the Presidio's value.

The PTMP calls for the use of sustainable practices and environmentally sound technologies, and includes strategies to minimize automobile use, use of "green building" guidelines, energy and water conservation, materials recycling, pollution prevention and abatement, and environmental remediation. Planning district guidelines are provided to guide physical changes that may be proposed in the future, ensuring their compatibility with the park and the NHLD. Any major new construction will be required to conform with these quantitative and qualitative standards, and will be the subject of further public input and review. Tenant diversity is embraced as a policy, and three tenant selection criteria are provided, addressing financial, programmatic, and policy issues. Preferred tenants will serve the public interest and will meet all three selection criteria.

Overall, the PTMP provides a vision for the park's future in place of the "global center" dedicated to addressing the world's most "critical challenges" that was proposed in the 1994 GMPA. The new vision focuses on the preservation and enhancement of the Presidio's resources for public use and enjoyment; it acknowledges that by making the Presidio a demonstration and education site for preserving open space with high biological values within an urban area, one of the worlds' most "critical challenges" will be addressed. With implementation of PTMP, the Trust will preserve and interpret the Presidio's natural, cultural, scenic, and recreational resources as part of a great national park where people may develop a deeper awareness of our nation's history and the social landscape of the West; where visitors may develop a more comprehensive understanding of connections between human and natural history, and find personal inspiration. Achieving the vision will not be easy, and will demand that all goals, including preservation and financial goals, be carefully balanced and integrated, as provided in the PTMP.

Features of the PTMP are fully described as the Final Plan Alternative in Section 2.5 of the Final EIS and in the separate volume, released to the public with the Final EIS, called the *Presidio Trust Management Plan: Land Use Policies for Area B of the Presidio of San Francisco.*

III. OTHER ALTERNATIVES CONSIDERED

In addition to the selected action, the Trust developed and considered five other alternatives to the PTMP (Final Plan Alternative) and one variation of the Final Plan Alternative, as described below. The Trust developed the range of programmatic alternatives based upon extensive public participation in scoping and reviews of documents, and so as to capture a range of possible actions and impacts.

A. NO ACTION ALTERNATIVE (GMPA 2000)

The General Management Plan Amendment (GMPA) 2000 Alternative, has been included in the analysis to evaluate the impacts of a "no action" alternative as required by NEPA and to reflect what would happen if no further changes were made to the GMPA as finalized by the NPS in 1994. This Alternative is the baseline against which other alternatives in the Final EIS are compared. In formulating the No Action Alternative, the Trust remained as close to the 1994 GMPA land use assumptions as present circumstances will allow. The No Action Alternative is not without impacts and would have resulted in changes to the Presidio. Specific events and changes since 1994 make it impossible to rely on the GMPA alternative exactly as it was described (i.e., "Alternative A") in the Final GMPA and associated EIS. Primary differences between the 1994 GMPA and the updated "GMPA 2000" Alternative are summarized in Section 2.1 of the Final EIS, and include the departure of the Sixth U.S. Army and updates to reflect more current leasing and financial conditions.

The No Action Alternative would implement the 1994 GMPA for the Presidio as updated to year 2000 conditions. Tenants and residents would work together to create a global center dedicated to addressing the world's critical environmental, social, and cultural challenges. Cultural and natural resources throughout the Presidio would be protected and enhanced and new programs would be established through public/private partnership. Historic buildings and landscapes that distinguish the NHLD would be rehabilitated and adaptively reused. Buildings would be removed to increase open space and/or enhance recreational, cultural, and natural resources. The housing supply would be substantially reduced and remaining units would be used by park partner employees, program participants, and visitors. The historic forest, streambed and riparian corridors, native plant communities, and recreational opportunities would be protected, improved, and expanded in some instances. A variety of improvements would be implemented to make the Presidio easy to reach, explore, and enjoy.

The Presidio would become a model of environmental protection and sustainable design. Tenants with an organizational mission focused on environmental and social sustainability or skills in education and science, innovative technologies, and problem solving would be selected to lease buildings and develop and operate programs at the site. Park partners would offer a wide range of programs to inform visitors about the Presidio's resources, discuss global concerns, celebrate cultural diversity, and educate the public on environmental issues. The Trust and NPS would cooperate to provide a base level of interpretive services and education about the Presidio's history and significant resources. The No Action Alternative is more fully described, together with proposed land uses and description of building use preferences, in Section 2.4 of the Final EIS. Reasons for choosing a different alternative are set forth in Section IV, below.

B. FINAL PLAN VARIANT

The Variant to the Final Plan alternative was included at the request of several environmental organizations during the public review period on the Draft EIS. The Variant is modeled closely after the land use proposals of the Final Plan Alternative, and its environmental impacts fall within the range presented by the other alternatives. The Final Plan Variant places a greater emphasis on open space than either the Final Plan Alternative or the No Action Alternative, calling for greater building demolition and therefore less built space as well as no new construction. The Variant proposes an overall building square footage of 4.7 million square feet, and would demolish a number of historic buildings that contribute to the NHLD status to achieve the reduction in building space. Similar to the Final Plan Alternative, the Variant would seek to rehabilitate and reuse historic buildings, adapt non-historic buildings to high priority uses, expand open space, and achieve financial self-sufficiency.

There would be proportionately less cultural/educational building use and proportionately more office use in the Final Plan Variant when compared to the Final Plan Alternative. More housing would be provided than under the No Action Alternative, but less than under the Final Plan Alternative, and less than exists today. As in the Final Plan Alternative, some housing units removed in other parts of the park would be replaced through subdivision and conversion of existing space, but the possibility of obtaining any replacement units through new construction would be foreclosed in the Final Plan Variant. Like the No Action Alternative, tenants would not be selected unless they offered a business purpose dedicated to addressing critical world challenges and park programming. The Variant is more fully described, together with proposed land uses and description of building use preferences, in Section 2.6 of the Final EIS. Reasons for choosing a different alternative are set forth in Section IV, below.

C. RESOURCE CONSOLIDATION ALTERNATIVE

Under the Resource Consolidation Alternative, the Presidio would become an enhanced open space haven in an urban setting by maximizing the increase in open space in the southern part of the park and concentrating development in the north. Overall, building square footage in Area B would be reduced from what currently exists due to loss of residential units and building space. A substantial number of buildings would be demolished, including the entirety of the historic Public Health Service Hospital (PHSH) complex, which would affect the integrity of the NHLD. Open space and natural resource enhancements (e.g., endangered species recovery and Tennessee Hollow riparian restoration) would be maximized, and recreational opportunities expanded. Tenets of sustainability, bio-diversity, smart growth, and preservation would be promoted by preserving and enhancing the Presidio's natural and cultural resources and concentrating building area, including in-fill mixed-use and housing construction in the northern part of the park. Buildings would be rehabilitated for new uses. The primary goal would be reuse of existing structures along with compatible new construction that would generate sufficient funds for open space improvements and park enhancements. Park programs would be delivered in a manner similar to the Final Plan Alternative, but at a somewhat reduced level. Programs would focus on the park's bio-diversity, including native species and ecosystems, and the history of the Presidio. The Resource Consolidation Alternative is more fully described, together with proposed land uses and description of building use preferences, in Section 2.7 of the Final EIS. Reasons for choosing a different alternative are set forth in Section IV, below.

D. SUSTAINABLE COMMUNITY ALTERNATIVE

Under the Sustainable Community Alternative, the Presidio would become a sustainable live/work community in a park setting and a model of environmental sustainability. The Alternative emphasizes creation of a Presidio-based community of users offering innovative, state-of-the-art approaches to environmental sustainability and related subjects. Open space and recreational opportunities would be expanded, and historic forest and native plant communities improved. Riparian corridors would be restored and the historic forest rehabilitated and preserved as part of the cultural landscape. The historic character and integrity of the NHLD would be protected. A moderately low level of non-historic building demolition would occur to enhance open space and improve native plant communities. The footprint of the built environment would largely remain in its present dispersed pattern and an emphasis would be placed on building rehabilitation and reuse. While the existing number of housing units would decrease, the total number of units would be more than under the No Action Alternative (GMPA 2000). Residents would also work in the park, supporting a sustainable park community. Park programs would be delivered in a manner similar to that proposed by the Final Plan Alternative, but at a somewhat reduced level. The Sustainable Community Alternative is more fully described, together with proposed land uses and description of building use preferences, in Section 2.8 of the Final EIS. Reasons for choosing a different alternative are set forth in Section IV, below.

E. CULTURAL DESTINATION ALTERNATIVE

In the Cultural Destination Alternative, the Presidio would be a national and international cultural destination park, a portal for visitors to the American West and Pacific, and a place of international distinction for its programs in research, education, and communication. Historic and natural resources would be protected to preserve the Presidio as a sustainable national park. Open space would be expanded. Native plant communities and riparian corridors would be restored; the historic forest would be rehabilitated and preserved as part of the cultural landscape, and recreational

opportunities would be increased. A substantial level of non-historic building demolition in the southern portion of the park would occur to enhance open space and restore critical habitat. Replacement construction would occur in the northern portion of the park to provide an improved mix of housing units and cluster housing near work and transit. The Trust would be primarily responsible for delivery of a wide variety of high quality programs in cooperation with NPS, tenants, philanthropic organizations, cultural institutions, and community volunteers. Tenants would support park programming in a number of ways, including directly providing a public program for park visitors, contributing financially, or offering in-kind services to a park program. Tenants would be selected in part for their financial contribution (as required by the Trust Act) and willingness and ability to support park program goals. The Cultural Destination Alternative is more fully described, together with proposed land uses and description of building use preferences, in Section 2.9 of the Final EIS. Reasons for choosing a different alternative are set forth in Section IV, below.

F. MINIMUM MANAGEMENT ALTERNATIVE

Under the Minimum Management Alternative, the Presidio would be managed to the minimum extent needed to meet basic legal requirements, including protection of the visiting public and the park's resources. There would be no significant physical change beyond that already underway; no significant park enhancements, and no new building construction or building removal would occur. Buildings would simply be rehabilitated to meet essential code requirements, consistent with the Secretary of the Interior's Standards for historic buildings and then leased out for the highest and best use. Tenants would have discretion in offering publicly available programs, and preference would be given to those tenants proposing to offer programs or services consistent with the General Objectives of the GMPA. There would be no educational, visitor, or cultural programming beyond what already exists. The Wherry housing complex would remain in use indefinitely as housing. Housing would be improved to meet code and historic preservation requirements and made available for rent by Presidio-based employees and others according to a prioritization system. Natural resource systems would not be significantly enhanced. The Minimum Management Alternative is more fully described, together with proposed land uses and description of building use preferences, in Section 2.10 of the Final EIS. Reasons for choosing a different alternative are described in Section IV, below.

Discussion of 40 CFR § 1505.2(b) Requirement: CEQ regulations require that, in cases where an EIS has been prepared, the ROD, in addition to identifying all alternatives considered, must specify the alternative or alternatives which were considered to be environmentally preferable. 40 C.F.R. §1505.2(b). According to CEQ, "The environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA's Section 101. Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources." Forty Most Asked Questions Concerning CEQ's NEPA Regulations, Question #6, 46 FR 18026 (March 23, 1981), as amended, 51 FR 15618 (April 25, 1986). In this context, where there are a multitude of environmental interests, and by the very nature of the planning decision the ranges of impacts overlap, the determination is not clear cut.

Among the complexities in this determination is the need to weigh multiple environmental values against other considerations. For example, natural resource protection was often at odds with protection of historic and cultural resource values. Each alternative considered strikes a different balance between these interests. Similarly, protecting natural resources may be at odds with people's use of the park as measured by building space and visitors. Thus, from the point of view of natural resource protection, the Resource Consolidation Alternative is preferable because it creates the greatest extent of un-fragmented open space to enhance native plant habitat, wildlife corridors and other biotic values. But this alternative has the greatest adverse effect on individual historic structures (removes the historic portion of the Public Health Service Hospital and all adjacent historic buildings), and so is not preferable from a cultural resource standpoint.

Another way to view the inquiry is to assess the alternative that would result in the least damage to the environment as measured by physical change over time. From this perspective, the Minimum Management Alternative would result in the least physical change to the park, but would have greater effects on the environment from the greater numbers of people interacting in the park. The mirror image of this approach is to look for the alternative with the fewest number of people interacting in and with the park which reduces the direct and secondary environmental effects, and under this

view, the No Action Alternative (GMPA 2000) and the Final Plan Variant are preferable. Another approach is to assess, as CEQ suggests, the alternative(s) that best protects, preserves and enhances the mix of historic, cultural, and natural resources. In this planning process, where resources cannot be protected without active intervention and timely and sufficient funding that is self-generated, the Final Plan Alternative would be environmentally preferable for all the reasons set out in the ROD. Under this same approach, the No Action Alternative (GMPA 2000), although it may take more time to achieve, would also protect and enhance the mix of historic, cultural, and natural resources of that Plan alternative. In terms of assessing the "least damage" noted by CEQ, none of the Alternatives, except for the Resource Consolidation Alternative (i.e., impaired status of the NHLD), result in a potential adverse effect that is unavoidable, and under this view, all other alternatives are environmentally protective and could therefore be said to be environmentally preferable.

The Trust has carefully evaluated all of these competing goals, values, and interests. In the context of this comprehensive planning process, where there are so many competing values and offsetting factors, the Trust's determination of what is the environmentally preferable alternative must be reduced to an overly simplistic assessment that weighs one value against another or applies one approach over another. To resolve the difficulty, CEQ also guides that the comments from the public and other agencies can assist the lead agency's determination. Thus, here, where a basis exists for identifying multiple alternatives as environmentally preferable, the Trust will also look to a segment of public sentiment that argued in favor of the No Action Alternative (GMPA 2000) as being preferred environmentally over other alternatives because it resulted over time in the least number of people within the park setting and therefore lesser secondary environmental effects.

The alternative selected for implementation need not coincide with the environmentally preferable alternative, because the decision to select a particular alternative may involve other factors. The Trust believes a balance of factors different than that offered by the No Action Alternative (GMPA 2000) is preferable for the park's long-term management framework, and the other policy factors considered and the reasons for selecting the Final Plan Alternative are set forth in Section IV, below.

IV. BASIS FOR THE DECISION

A. BASIS FOR SELECTION OF THE FINAL PLAN ALTERNATIVE

The Trust has selected the alternative that, in its judgment, best fulfills the purpose and need outlined in Section 1.2 of the Final EIS, including the specific objectives of the Plan update (see Final EIS Section 1.3). The purpose of the Plan update is to provide a land use policy framework to guide the Trust's implementation of the Trust Act by updating the management concepts and land use proposals of the 1994 GMPA for the area of the Presidio under the Trust's jurisdiction. The PTMP provides such a framework, and meets three primary needs: 1) The PTMP is well-suited to and consistent with the statutory requirements for Area B enacted by Congress in the 1996 Presidio Trust Act; 2) The PTMP addresses changed conditions that have occurred since NPS adopted the 1994 plan for the Presidio, reconsiders and updates the GMPA's market clusters concepts, and provides revised land use concepts for Area B of the Presidio that can accommodate changing opportunities and market conditions; and 3) The PTMP reflects the Trust's management policies and approaches, plans and manages for financial uncertainty, and provides an approach to leasing and financing that better addresses market opportunities and realities, and offers flexibility to respond to market factors.

Specific objectives, developed with public input, provide a framework for evaluating the extent to which alternatives meet the purpose and need for the plan update. The objectives address the multiple and sometimes competing factors involved in meeting the plan's purpose and need. The decision to adopt PTMP as the governing management plan for Area B of the Presidio is based upon having considered the following objectives independently and collectively and selecting the alternative that strikes the best balance among the many objectives and goals including resource protection, public use, and sound financial management, as discussed in detail below.

1. PTMP IS CONSISTENT WITH AND ACHIEVES THE TRUST ACT'S RESOURCE MANDATE

The PTMP focuses on the core mission of the Trust: the preservation of the Presidio's cultural, natural, scenic, and recreational resources for public use.[1] Unlike the other alternatives, the Final Plan Alternative not only emphasizes preservation and enhancement of the Presidio's cultural, natural, scenic, and recreational resources for public use, but also makes this the Plan's primary vision. Focusing the vision in this way follows and is consistent with the urging of the NPS, which stated in its comments on the Draft Plan: "The Presidio's unique park character — its significant cultural natural, scenic and recreational resources — must be the cornerstone that guides our vision. We urge the Presidio Trust to put this vision first." (NPS Comment Letter, October 25, 2001).

Policy statements in support of this vision are detailed in PTMP Chapter One, Preserving & Enhancing Park Resources, and will protect the historic character and integrity of the NHLD, the Presidio's cultural landscape, and archaeological resources. Policies also assure that the Presidio will remain an open space haven, and open space and natural habitats will be preserved, enhanced, and increased. Ultimately, approximately 75 percent of the Presidio will become and be managed as open space, providing both natural habitat and recreational opportunities, values that in a densely urban area are often difficult to preserve and maintain.

Resource protection is a difficult goal in view of the challenge of generating revenues sufficient to operate, maintain, and sustain the Presidio without taxpayer support beyond 2013. Fulfilling the resource mandate demands that preservation and financial goals be balanced and integrated. The Trust could theoretically achieve financial self-sufficiency in any number of ways, as was shown in the financial analysis of the different alternatives in the EIS, but if it does so without establishing a financial base that is strong enough to ensure the timely rehabilitation of the Presidio's historic buildings and landscapes, the restoration of its natural resources, and the preservation of its historic character into the future, the Trust will not have accomplished its legally mandated role. In the Trust's judgment, the Final Plan Alternative provides the needed financial security and the flexibility to accomplish the mandate of resource preservation and protection.

2. PTMP IS CONSISTENT WITH AND ACHIEVES THE TRUST ACT'S FINANCIAL MANDATE

Caring for the Presidio will be costly and will involve managing a complex set of financial challenges and tradeoffs. Unlike the wild lands typical of many parks, the Presidio's resources need active intervention, investment and management to preserve their integrity. Historic buildings, the historic forest, scenic views, and natural habitats will deteriorate without timely investment in maintenance and restoration, and substantial investment is needed to create, restore and maintain open space. In establishing the Presidio Trust as a wholly-owned federal government corporation, Congress created an organization that could operate in the public marketplace, make real-time decisions, and reinvest revenues into the park in order to generate sufficient cash flow to eventually operate the park without federal appropriations after 2013.

The Trust Act requires that the Trust generate sufficient revenues to support its financial needs free of annual Congressional appropriations by the 2013 deadline and to sustain the Presidio financially into perpetuity. The Trust must fund all of its expenses with limited revenue sources, including gradually diminishing Congressional appropriations, U.S. Treasury borrowing — which must be appropriated and subsequently repaid — and lease revenues. Annual appropriations will gradually diminish and ultimately cease in 2013; thus lease revenues must increase substantially over time to make up for declining income. The Trust's success in meeting its financial mandate depends upon the real estate market, the quality and quantity of building space that is made available for lease, as well as the Trust's capacity to plan for, respond to, and manage financial uncertainty, variability and external forces. The rate at which the Trust invests in the preservation and enhancement of the Presidio's resources will also affect the Trust's ultimate success in protecting the park for future use. While each alternative studied may have had the potential for

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[1] The resource mandate of the Trust is found within section 104(a) of the Trust Act stating that the Trust must exercise the Trust Act's authorities "in accordance with the purposes set forth in section 1 of the [GGNRA] Act" (Public Law 92-589; 86 Stat. 1299; 16 U.S.C. 460bb). The GGNRA Act begins with a purpose to "preserve for public use and enjoyment certain areas … possessing outstanding natural, historic, scenic, and recreational values…." It also seeks "to provide for the maintenance of needed recreational open space necessary to urban environment and planning …."

financial success, in the Trust's view, PTMP provides the best balance between financial strength, financial flexibility, and the mandated non-revenue generating policy choices, and this creates a greater likelihood of successfully achieving the financial mandate of the Trust Act.

First, the PTMP provides a diverse land use/building use mix that can provide more stable and robust revenue potential than other plan alternatives. PTMP provides more residential leasing opportunities and the possibility to concentrate on residential cash flow to a greater extent than most other alternatives. Residential cash flows are more predictable and certain than non-residential cash flows, a fact made more evident by present market conditions and past financial experience of the Trust. Whereas most of the other alternatives would reduce housing units within the park, the PTMP allows up to 1654 residential accommodations, the same number that currently exist within the park. By comparison, the revenue component of most of the other alternatives evaluated may be less predictable because they have a smaller proportion of residential space. Two alternatives pose the further disadvantage of limiting the non-residential tenant pool to the types of tenants willing and capable of paying an average annual market-rate rent lower than other market-rate office rents, thus also limiting the non-residential revenue potential of these alternatives.

Second, the PTMP provides reasonable security that the park can be preserved and is flexible enough to respond successfully to market forces. The Trust must oversee the dynamic interaction among revenue generation, building rehabilitation costs, market conditions, and tenant leasing incentives. The Trust is also subject to the fluctuating conditions of the real estate market. When the market is strong, there will be more tenants willing to pay higher rents and to provide capital to improve Presidio buildings. When markets decline, as they inevitable and cyclically do, the Trust will face a greater challenge. Attracting tenants will be more difficult. It will be important for the Trust to create leasing conditions that attract tenants, but in the event the Trust overestimates its revenue targets or underestimates its costs, the Trust has concluded that the PTMP has the capacity nevertheless to achieve self-sufficiency and long-term sustainability.

Third, the PTMP offers other financial tools to manage real estate risk and financing of building improvements and other park objectives. The possibility of limited new construction is a financial management tool that in the Trust's judgment is prudent to retain among the mix of possible management practices. New construction can offer fewer financial risks than reuse of existing buildings, and can provide a reliable revenue stream to help finance historic preservation of adjacent or nearby buildings or activities. In all likelihood, new construction would be undertaken by third parties under a ground lease arrangement,[2] not directly by the Trust. With this arrangement, the costs of improvements are not borne by the Trust, nor does the Trust assume risks associated with potential cost overruns, vacancies, or declining rents. New construction can also help to obviate financial risks associated with historic rehabilitation, because a building addition or annex can help provide revenues to support the historic rehabilitation.

These advantages must be weighed against and balanced with its disadvantages — lower annual rent payments from a ground leasing arrangement, particularly in early years when tenant/investors are essentially paid back for their investment. The availability, nevertheless, of some limited new construction that could be used as a financing tool or as a means to shift real estate risk to third parties is, in the Trust's judgment, an important option that would be unavailable or overly restricted under some of the other alternatives.

In addition to the other financial reasons for preferring the PTMP is its theoretical capacity to respond successfully to financial variability and uncertainty.[3] PTMP offers the opportunity to minimize the time to completion of park resource and infrastructure enhancements and to begin building reserves earlier than other alternatives. Analysis also suggests

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[2] A ground lease is the right to use a land parcel for a definite length of time by a tenant who invests the necessary capital to develop and construct improvements (e.g., a building) on the site.

[3] The Trust developed a financial planning model for the limited purpose of comparing the general land use alternatives. The model was used to predict the theoretical capacity of each alternative to achieve short-term self-sufficiency by 2013 and the time needed to reach long-term sustainability, and to compare the financial performance of alternatives in terms of relative revenue generation capacity, time to completion of park enhancements, and estimated time needed to achieve a stabilized financial state. The extent and effects of uncertainty and variability were addressed through the use of modeling sensitivity analyses. Here, where the Trust's planning process involved a long 20- to 30-year planning horizon, the most useful modeling tool was one designed to compare financial performance based upon reasonable, conservative, but largely common assumptions, rather than a model designed to accurately predict future financial outcomes. Its results should be viewed as an indicator of relative performance only, not as a means to project actual, expected financial results. Recognizing these limitations of the financial planning model, the Trust views the results as informative but not controlling. Many other factors, as set out in this ROD, formed the basis for the Trust's decision to select the Final Plan Alternative, and the results of the financial analysis alone have not been dispositive of the selection decision.

that the PTMP's time horizon for completion of the capital program is more predictable than other alternatives with the smallest deviation in date of completion under different sensitivity tests such as revenue reduction, capital cost deviation, or variable operating expenditures. In the Trust's judgment, the PTMP provides the best approach to meeting the Trust's financial mandate.

3. PTMP PROVIDES THE FLEXIBILITY TO RESPOND TO MARKET CHANGES AND OPPORTUNITIES

PTMP provides sufficient flexibility in land use decisions to allow the Trust to tailor lease offerings to the demands and conditions of the real estate market. With a few exceptions, the PTMP does not prescribe building uses. It identifies preferred uses for certain key structures, but allows secondary uses to be considered, thus providing more leasing flexibility over the life of the plan than did the 1994 GMPA. If a preferred use cannot be realized, then PTMP allows the Trust to consider alternative uses without need of a lengthy plan amendment process. In lieu of prescribing building uses, the Trust has committed to seek continuing public input on future Presidio projects and proposals and to undertake site-specific and district-level planning efforts and environmental analysis as needed in the future. Other alternatives, specifically the No Action Alternative (GMPA 2000) and Final Plan Variant, are more prescriptive in allowable uses for Presidio buildings. The more prescriptive approach offers a greater degree of certainty as to building uses, but is not well suited to market forces and opportunities and financial variability, key factors that the Trust must manage over time. In the Trust's judgment, the PTMP best meets the Trust's needs to respond efficiently to the real estate market.

4. PTMP PROVIDES AND IS CONSISTENT WITH PLANNING PRINCIPLES AND DISTRICT GUIDELINES

PTMP sets forth planning principles that translate the resource protection vision of the plan into specific goals for managing Area B. The Planning Principles set forth the essential management objectives that will be applied as PTMP is implemented. The District Guidelines were developed based upon, and conform to, the Secretary of Interior's standards for the protection of historic and cultural resources. The District Guidelines correspond to the varied characteristics of each planning district and provide guidance on the treatment of open space, district character, views, access and circulation, and other physical characteristics. Future implementation actions of the PTMP will be assessed for consistency with the Planning Principles and the District Guidelines. In the Trust's judgment, the PTMP Planning Principles provide the best set of management guidelines for the Trust's future management of Area B of the Presidio.

5. PTMP BUILDS ON THE EARLIER GMPA AND HAS TAKEN INTO ACCOUNT PUBLIC INPUT

PTMP did not start from a blank planning program, but draws from and builds upon the 1994 GMPA to create an updated policy framework for Area B that balances and conforms the concepts and principles of the GMPA with the requirements and mandates of the Trust Act. Planning Principles within the PTMP are largely based on policies of the GMPA, including such commitments as preserving the NHLD, restoring Tennessee Hollow, creating a transit center at the Main Post, using sustainable practices, and many more.

The plan is also responsive to an extensive public participation process. The Plan involved more than two years of effort. In addition to the more than 600 letters received during six months of public scoping, the Trust received more than 3,000 comment letters as well as oral comments at two public hearings and a public meeting of the GGNRA Citizen's Advisory Commission during the 90-day public comment period on the Draft Plan and EIS. The thousands of public comments received were extremely useful in the planning process. The Trust is indebted to the creative and constructive comments that resulted in improvements to the Plan, such as the clearer statement of the Plan's vision, the strengthened commitment to protection of the NHLD, and the change of the name from PTIP to PTMP to better reflect the programmatic nature of the Plan, among others.

Many organizations and individuals have acknowledged the meaningful changes made in response to public comments on the Draft Plan or have expressed the point of view that the Final Plan Alternative is an appropriate balance of a complex mix of resource protection and financial goals and requirements. See Attachment 2 (Report Accompanying the

ROD) at Section II.A. As an example, the U.S. Environmental Protection Agency writes: "In our review of the FEIS, EPA found the document adequately addresses the issues we raised. Modifications to the [Draft EIS] are clearly identified, and changes to the project based on prior feedback from EPA, other agencies, and the public are thoroughly discussed. The revised project reduces the impacts to the environment, and is responsive to the public's concerns regarding protection of the natural, cultural, and historic resources within the Presidio. The Final Plan provides a good balance among competing visions for Area B of the Presidio." (EPA letter, June 24, 2002). In the Trust's judgment, the PTMP is the best combination of elements from the 1994 GMPA and updates to it that overall successfully balance many different, and often competing, public comments.

6. PTMP IS GOOD HOUSING POLICY

PTMP, unlike some other alternatives considered, recognizes that housing is essential to the historic character of the Presidio. Over 40 percent of the building space at the Presidio is presently housing stock. People have always lived at the Presidio, and the park's homes, many of which are historic, are an essential feature of its cultural landscape and critical to its character. Throughout the Presidio today, there are 1,116 conventional dwellings and 538 group quarters (i.e., barracks and dormitories). Approximately 80 percent of the dwellings and 25 percent of the group quarters have been occupied within the last year. All of these accommodations were occupied by the Army, and are reflected in the 1990 Census, which reported a Presidio population of 4,700 just after base closure was announced. Maintaining residential use in the Presidio residences is good land use planning practice; residents add to the vitality, safety, and security of the Presidio. Residential use is a cost-effective way to reuse and preserve many historic buildings that are already configured as or may potentially to be converted to residences.

PTMP will also maintain the supply of housing that most other alternatives would have reduced. This is good environmental policy because, housing Presidio-based employees close to where they work serves to reduce and minimize automobile traffic in and out of the park, and in so doing reduces traffic and air quality impacts. The PTMP housing component is also good public policy. Growth in the San Francisco Bay area throughout the last decade has put stress on the regional housing market, which has historically ranked as one of the most expensive in the country probably due to population and employment growth and lack of developable land. PTMP addresses Presidio employee housing demand and reduces potential spillover impacts on the regional housing supply to a greater extent than other alternatives. It also accommodates a broad spectrum of housing opportunities and tenants with a range of income levels through its affordable housing policies and plans for changes over time in the composition of housing at the Presidio. In expressing support for PTMP's housing component, the San Francisco Housing Action Coalition (SFHAC) writes: "We strongly support the efforts of the Presidio Trust to make the Presidio a self-sufficient, multi-use park. Our most important concern is to ensure that the Presidio does not lose any housing in its projected plan . . . . As the Presidio creates new jobs, it is important that housing units are provided . . . " (SFHAC letter, June 3, 2002).

Using Presidio building space for housing is also important to the Trust's authority to meet its financial mandate. Lease revenue from residential use is the most reliable long-term source of revenue. With PTMP, a greater proportion of Presidio building space — about one-third — will be in residential use, thus offering the stable revenues needed for park operations, resource preservation, and other goals and objectives.

PTMP offers, in the Trust's judgment, the best plan for housing removal and replacement. Most of the alternatives considered the removal of Wherry housing to allow natural resource enhancements. PTMP goes further by allowing the removal of other non-historic dwelling units to achieve greater natural resource enhancements. PTMP also permits replacement of removed housing units to allow the Trust to address Presidio-based housing demand, minimize effects on regional housing supply, and meet other planning objectives (e.g., rehabilitation of an historic structure). A significant portion of the replacement housing is expected through subdivision and conversion of existing building space. PTMP also offers the option of replacing between 200 and 400 units within new structures. The Trust views this potential for newly constructed units as important not only to meet housing demand but also to offer the potential to improve the aesthetic and historic qualities of the park, make housing more accessible to public transit, and meet other objectives of the Plan (e.g., to reinforce an historic landscape pattern).

7. PTMP PERMITS A WIDE RANGE OF POTENTIAL TENANTS

PTMP best addresses the tenant selection requirements of the Trust Act[4] and balances these requirements with other policy goals. The pool of potential tenants is already limited by the Presidio's location and by the complexities of its available building space. The historic nature of many Presidio buildings limits their suitability for certain types of tenants, as does their layout and capacity for structural changes. Tenants, even if interested, may not have the capital to rehabilitate the space. In addition, the Presidio is not as close to downtown San Francisco or as accessible by transit services as other competing locations. Restricting the pool of tenants further makes the revenue and preservation missions of the Trust more difficult. Seeking a diverse range of tenants is the most prudent policy; it also mitigates the effect of economic downturns, weakness in or demise of any particular real estate sector, and changing social trends. PTMP commits to tenant diversity, and expands the pool of prospective tenants that may be willing to locate at the Presidio, including tenants that may be willing to provide the means to rehabilitate the Presidio's buildings and landscapes. It goes beyond any single type (e.g., non-profits) or purpose (e.g., addressing world problems) as set forth in the 1994 GMPA. In the Trust's judgment, diversity without quotas or prohibitions other than the principles set forth in the Plan and in the Trust Act will create a more robust and stable base of tenants, making the preservation of park resources more feasible.

8. PTMP PROVIDES FOR PUBLIC USE AND ENJOYMENT OF THE PRESIDIO

The Presidio was set aside as a park of national stature and a place for public enjoyment. PTMP makes the park accessible to the many not the few by proposing many ways for the public to use the park. PTMP plans for roughly one-third of the building space, a larger proportion than some other alternatives, to be used for public-serving use, such as cultural and educational uses, recreation, small-scale lodging, and other visitor amenities. In addition, the PTMP commits a greater level of financial support to programming for the public than some other alternatives in order to ensure that the Presidio can become accessible to a wide variety of people and interests.

PTMP envisions and commits to an array of public programs developed through the collaborative efforts of the Trust, the NPS, tenants, and other partners with program expertise. Relying predominantly on tenants to bring people to the park, as assumed by some of the other alternatives, may not provide the consistency, quality, or coherence that visitors to a national park deserve and expect. PTMP allows tenants to provide programs, but recognizes that tenants have their own missions and priorities, and that tenants themselves will come and go. If programs are to be consistent year after year, dynamic and diverse, responsive to the interests of the broad public yet specific to the place, the Trust believes that the Trust and NPS must be the primary coordinators of public programs.[5]

Among its visitor serving uses, PTMP provides for a modest amount — less than, for example, the No Action Alternative (GMPA 2000) — of different kinds of lodging in different locations of the Presidio. Rehabilitating certain Presidio structures for reuse as overnight accommodations is both an effective strategy for reuse of an historic building and a traditional use within national parks. To allow visitors to the Presidio the opportunity to stay overnight in an historic structure is a qualitatively different way to experience the park and is not comparable to accommodations offered outside the park's gates. The Trust views the modest lodging goals of the PTMP as desirable within the mix of visitor-serving uses.

9. PTMP ENSURES THE PROTECTION OF THE PRESIDIO NATIONAL HISTORIC LANDMARK DISTRICT

In recognition of the Presidio's historic significance, PTMP makes an unequivocal commitment to protection of the NHLD status. Any changes within the landmark district will comply with the National Historic Preservation Act and be

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[4] Section 104(n) of the Trust Act sets out specific tenant selection criteria: "The Trust shall give priority to the following categories of tenants: Tenants that enhance the financial viability of the Presidio and tenants that facilitate the cost-effective preservation of historic buildings through their reuse of such buildings."

[5] The Trust Act mandates that the NPS and the Trust cooperatively provide public interpretive services, visitor orientation, and educational programs. The Trust is committed to working with NPS; coordination with NPS will be focused on those areas where both NPS expertise and available resources can be optimized.

compatible with the park's setting. No changes will be undertaken that could affect the District's overall status or integrity — this includes demolition, new construction, and other physical changes within the District.

The best way to preserve historic buildings is to reuse them, and PTMP will ensure that historic buildings are rehabilitated and filled with adaptive and feasible uses to the maximum extent feasible. Historic structures may be rehabilitated for use as offices, housing, lodging, and the full variety of other building uses allowed under the Plan. In addition, PTMP will protect the Presidio's cultural landscapes, and undertake necessary enhancements, such as the planned rehabilitation of the historic forest. In the Trust's judgment, PTMP best meets the Trust's responsibility to protect the historic and cultural resources of the Presidio.

10. PTMP EMBRACES THE CONCEPT OF SUSTAINABILITY

The PTMP embodies the concept of sustainability by striking a balance between economic, social, and environmental issues — the three pillars of the sustainability concept. It meets the current needs of the park without compromising the quality of the park experience for future generations. Over the long-term, the Plan will make the Presidio a demonstration and education site for how open space with high biological value can be conserved and maintained in an urban area. PTMP also embraces sustainable practices and environmentally sound technologies in maintaining and operating the Presidio's facilities. The Presidio Trust is developing transportation strategies to minimize automobile use. The Plan includes an aggressive transportation demand management (TDM) program, including more options for public transit and pedestrian and bicycle travel, housing in the park for Presidio-based employees to limit traffic trips and minimize effects on air quality, and parking management as a tool to discourage automobile use and promote more sustainable means of travel. PTMP also applies sustainable building design and technology to rehabilitating structures and relies on safe and efficient energy generation, conservation practices, and recycling, salvage and solid waste reduction to create resource-efficient environments.

11. PTMP BEST BALANCES DIFFERING VALUES/MANDATES

Resource protection and financial security: The Presidio is expensive to operate and maintain. The large number of buildings and the improvements and services needed by Presidio occupants — roads and sewers, landscape maintenance, as well as rehabilitation and upkeep of the buildings themselves — make the Presidio among the most expensive national park sites. Resource protection and the financial means to achieve it are fundamentally interdependent. If either objective is viewed alone, it gives a distorted picture of what the Trust must accomplish. If the Trust adopts a plan that can achieve self-sufficiency without creating a financial base that ensures the protection and enhancement of the Presidio's resources, the Trust will not have accomplished the goals set forth by Congress. Conversely, the Trust can devote the monies currently at its disposal to enhancing the Presidio's resources, but if it does so without taking great care to provide for long-term financial sustainability, then the Presidio will not survive as a national park site. Examples are abundant: the historic forest is a natural resource, a cultural resource, a scenic resource, and a capital asset in need of substantial capital investment. Historic buildings are both cultural resources to be preserved and revenue sources to be developed. This balance defines the nature of the Trust and the Plan that it is adopting: all decision-making under the PTMP will take into account the balance between financial and resource protection factors and the effects on future generations. In the Trust's judgment, PTMP strikes the optimum balance; it values the diverse resources of the Presidio by making their protection and enhancement the centerpiece of the Plan vision, but allows for sufficient revenue generating assets in the form of building space to reasonably assure that the Trust can diversify its revenues and sustain the Presidio indefinitely.

Open space and developed space: PTMP strikes a reasonable balance between open space and developed space. The Plan will increase open space by about 100 acres over time and will result in about 75 percent of the Presidio (Area A and B) being devoted to valuable natural habitat and recreational opportunities. Other alternatives would have created up to 40 acres more open space than PTMP, but doing so would have come at the cost of reducing total building space, reducing the revenue generating potential of the Trust and reducing the Trust's ability to achieve other important goals such as maintaining housing for Presidio-based employees, and providing a wide array of public uses and programs. Also, some alternatives that prioritize open space to a greater degree than the PTMP would run the risk of removal of

significant historic buildings and potential impairment of the integrity of the NHLD to achieve the enhanced open space objective. To do so is unacceptable.

Balanced Use of Building Space: PTMP balances the possible building uses. Buildings contribute to the Presidio's National Historic Landmark District status and their rehabilitation will generate revenues necessary to support the park. For all of the reasons outlined (Section IV.A.6), the Plan commits about one third (a larger proportion than any other alternative) of the Presidio's building space to residential use. The Plan balances the remainder with one-third identified as office use and one-third for public-serving uses. In the Trust's view, a great national park exists to serve the public. Therefore, PTMP places greater emphasis on public-serving uses than most other alternatives, and provides for a balance between revenue generating uses and public uses.

Cultural and Natural Resource Protection: PTMP balances the protection of cultural and natural resources. To significantly enhance natural resources beyond the commitments made in the Plan could involve the removal of historic buildings, adverse changes to the cultural landscape, and — if substantially more non-historic housing is removed — construction of more replacement housing. The Trust believes it has found the appropriate balance between cultural resource protection and natural resource values in selecting the PTMP.

Environmental advantages versus disadvantages: The Trust has disclosed and weighed the environmental effects of the alternatives against the potential of each alternative to adequately meet the needs and objectives of the Trust so as to protect the Presidio over the long-term. The PTMP strikes an appropriate balance between beneficial and adverse effects, and — with mitigation — will not result in significant environmental impacts. Environmental advantages include commitments to protect the NHLD, to restore Tennessee Hollow, to restore native habitats and enhance their connectivity, to rehabilitate the historic forest, to conserve energy, water, and other natural resources, and many more. In contrast to other alternatives, the PTMP provides assurance that these advantages can be realized even if circumstances change, and that they can be accomplished within a reasonable time frame.

B. REJECTION OF OTHER ALTERNATIVES

In addition to the bases set out above for selecting PTMP as the updated land use policy framework for Area B of the Presidio, the Trust has considered the following factors in choosing not to select other alternatives.

1. NO ACTION ALTERNATIVE (GMPA 2000)

In the Trust's judgment, the No Action Alternative (GMPA 2000) does not provide the necessary tools to meet the difficult financial and management challenges associated with the Trust's mandate for preservation and financial self-sufficiency.

Insufficient Leasing Flexibility:[6] The GMPA envisioned "a park unlike any other" and prescribed that the Presidio should not simply be preserved but should become a "global center" where tenants would be devoted to "addressing the world's most critical environmental, social, and cultural challenges." (1994 GMPA p. v). Consistent with the GMPA, the GMPA 2000 Alternative emphasizes tenant selection based upon this vision, whereas the Trust Act requires consideration of leasing criteria not considered a priority under the GMPA. The Trust must "give priority" to tenants that "facilitate the cost-effective preservation of historic buildings through their reuse" and must look for credit-worthy tenants with the demonstrated financial means to help achieve the Presidio's "financial viability." See footnote 4. The GMPA vision, requiring tenants to have a business mission related to solving world problems unduly limits an already limited pool of tenants willing to locate at the Presidio and to contribute toward the rehabilitation of its buildings and landscapes. If the Trust were to adopt the GMPA 2000 Alternative, the tenant pool would be constrained to those who fit within the overlap of both the GMPA and Trust Act tenant categories. While undoubtedly there are some additional tenants beyond those that have already leased space at the Presidio who fit both the GMPA and Trust Act criteria and may be willing to sign long-term leases, their number is limited. Given the Trust's formidable financial challenge, the Trust believes that

[6] This same rationale is a basis for not selecting the Final Plan Variant.

such a constraint on potential tenancies creates unnecessary risk to the Trust's ability to discharge its foremost responsibility — the timely preservation of the park's resources for the public in perpetuity. In consideration of the significant costs of preserving and enhancing the Presidio's historic and natural resources and improving and maintaining its extensive infrastructure, the Trust does not wish to constrain its financial options in this way and has chosen a Plan that provides more leasing flexibility.

Reduction of Housing Supply:[7]*:* The No Action Alternative (GMPA 2000) would dramatically reduce the supply of housing within the Presidio, and would significantly reduce the Presidio's capacity to satisfy Presidio-based employee demand for housing. The Trust needs a plan that recognizes that housing is essential to the character of the Presidio and to its fiscal well being, and that would therefore maintain the supply of housing that the GMPA-based alternative would have eliminated.

Idealistic approach to public programming:[8] The GMPA assumes that the majority of public programs for park visitors would be provided by park tenants. The Trust views this approach to providing visitor programs as idealistic and impractical. Tenants have their own missions and priorities that change, and tenants themselves come and go. If programs are to be consistent year after year, dynamic and diverse, responsive to the interests of the broad public yet specific to the Presidio, the Trust concludes that the Trust and NPS must be the primary coordinators of public programs. See Section IV.A.8.

2. FINAL PLAN VARIANT

Jeopardizes historic resources and is not sustainable: The Variant proposes a reduction in overall building square footage from today's 5.96 million square feet to 4.7 million square feet (900,000 sf less than PTMP), and calls for demolition of a number of historic buildings that contribute to the NHLD status to achieve the reduction in building space, as well as a number of non-historic buildings that can easily be reused to generate revenue or meet other public purposes. Prioritizing the reduction in building space to the extent called for in the Variant does not meet the Trust's goals for historic preservation. Tenets of historic preservation and principles of sustainability articulated in both the GMPA and the PTMP allow for the retention and reuse of viable buildings, and a better balance between open space and developed areas.

Constraints on new construction: The Variant precludes new replacement construction for any purpose over the life of the plan, and this constraint is impractical.[9] The Variant forecloses the possibility of replacing housing units removed to meet other resource protection goals, except through subdivision and conversion of existing space. At some point, subdivision and conversion of more marginally suited structures to obtain the planned number of housing units will become economically infeasible and may jeopardize the protection and integrity of individual historic structures. For non-residential space, the Trust considers new construction to be a desirable management option to provide for the feasible and adaptive reuse of the Presidio's historic buildings and to serve as a financial management tool for shifting real estate risk. Just as the NPS discovered when it determined that reuse of the historic Presidio fire station necessitated a new addition, the Trust expects that making the rehabilitation and reuse of historic buildings functionally and financially feasible may at times require the addition of newly constructed space. The Variant appears to foreclose these options, which are necessary to meet the Trust's needs.

Reduction of revenue generating assets: The Final Plan Variant places the highest priority on the creation of open space, calling for greater building demolition so as to achieve less built space than any other alternative, even less than the original GMPA from which this Plan is developed. Buildings are the Trust's primary revenue generating assets, and removing this much building space is in the Trust's view financially imprudent. Furthermore, reducing building space to this extent is not necessary to accomplish mandated resource protection or to expand open space and restore natural areas of the park.

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[7] This same rationale is a basis for not selecting the Final Plan Variant and the Resource Consolidation Alternative.
[8] This same rationale is a basis for not selecting the Final Plan Variant.
[9] New construction includes any additional square footage that is added outside of the existing building envelope, whether as an addition to an existing building, as an annex, or as a freestanding structure.

3. RESOURCE CONSOLIDATION ALTERNATIVE

Adverse effect on NHL District: The Resource Consolidation Alternative calls for the highest level of building demolition of any alternative — substantially more than under either the No Action (GMPA 2000) or Final Plan Alternatives. The Alternative would include removal of all buildings within the entire Public Health Services Hospital Planning District, including the historic former hospital and its associated seventeen historic outbuildings to create open space. Demolition of the PHSH complex, including removal of all historic buildings and cultural landscapes would constitute an adverse effect on the NHLD. The Trust has chosen not to adopt an alternative that, while maximizing natural resource enhancements, adversely affects contributing buildings and cultural landscapes, and potentially jeopardizes the integrity of the NHLD status.

4. SUSTAINABLE COMMUNITY ALTERNATIVE

Highest level of environmental effects — The Sustainable Community Alternative, resulted in the worst air quality, highest noise levels, and highest traffic levels. When the Trust developed the Sustainable Community Alternative, it did so with a concept of sustainability in mind, and developed a mix of uses consistent with the concept. The concept of sustainability suggested that a high percentage of people would live close to their workplace to minimize traffic and auto trips. As a result, this alternative included a higher percentage of office, residential, and retail uses than other alternatives. The Trust did not anticipate the environmental outcome of this use mix, but the evaluation presented in the Final EIS indicates that this Alternative results in greater potential environmental effects than other alternatives. In the Trust's judgment, the adverse impacts on environmental quality associated with this Alternative, when considered as a whole, are unacceptable.

5. CULTURAL DESTINATION ALTERNATIVE

Overemphasizes development in the northern part of the park: The Cultural Destination Alternative called for a high level of physical change within the park through a relatively high level of demolition, concentrated in the southern portion of the park, and replacement of all removed building space through new construction and infill development within the northern part of the park. Although creating greater density of development near work and transit is a desirable land use planning principle, in a park setting like the Presidio, the Trust believes moderation is warranted. Like the Sustainable Community Alternative, this alternative also resulted in a higher level of overall environmental impacts than the Trust finds acceptable. The Trust therefore designed the Final Plan Alternative to strike a better balance among the level of physical change within the park, the level of allowable new construction, and a land use pattern that would support a sustainable and somewhat more compact live-work community.

New construction in NHLD: The Cultural Destination Alternative calls for the highest level of new replacement construction within the park setting. Although these changes could be proposed and designed to be compatible with surrounding buildings and the NHLD, the Trust desires a Plan with a more moderate allowance of new construction to be used in those instances where it can be targeted to achieving specific policy goals of the Plan.

6. MINIMUM MANAGEMENT ALTERNATIVE

Prioritizes financial result: This alternative would result in little physical change to the Presidio and no significant resource enhancements other than to meet minimal legal requirements. The alternative assumes leasing for "highest and best" use to maximize revenues, and places little emphasis on resource protection or enhancements. The strength of this alternative is in its financial capacity, but in the Trust's view, this alternative maximizes revenues at the expense of other needs and plan objectives. It does not reflect the importance of the natural resource, public access, or other programmatic goals for the Presidio, and is rejected for these reasons.

C. CONCLUSION

For all of the reasons outlined, PTMP meets the project's purpose and need, and among the considered alternatives, it is the one that in the Trust's judgment best 1) provides a planning framework well-suited to and consistent with the

statutory requirements for Area B enacted by Congress in the 1996 Presidio Trust Act; 2) assesses and integrates changes that have occurred since NPS' 1994 plan for the Presidio became final ; and 3) revises the governing plan for Area B to include the management policies and approaches and needs of the Trust.

V. MEASURES TO MINIMIZE POTENTIAL ADVERSE ENVIRONMENTAL IMPACTS

All practicable mitigation measures identified in the Final EIS to avoid or minimize environmental impacts that could result from implementation of the PTMP will be carried out. These mitigation measures are discussed in greater detail at the end of each impact analysis in Section 4 of the Final EIS and include all relevant measures from the GMPA EIS and additional measures that were identified during the course of the analyses to further reduce potential impacts.

As part of the decision to implement PTMP, the Trust is adopting a Monitoring and Enforcement Program (MEP) to monitor impacts and mitigation during plan implementation. The MEP provides for the implementation of the mitigation measures as proposed in the Final EIS, where these measures are within the ability of the Trust to implement. Where measures fall outside of the Trust jurisdiction, this fact is noted, along with a description of ways in which the Trust will assist and encourage other agencies to implement these measures. The MEP has been formatted as a table, and is appended to this ROD as Attachment 1, with the following information:

- Mitigation Measure – Taken directly from Section 4 of the Final EIS;
- Timing of Implementation – Applicable milestone or phase when mitigation measure will become applicable;
- Responsibility for Implementation – Agency with jurisdiction and (where known) individual who will ensure that the mitigation measure is accomplished;
- Method of Implementation – How action will be implemented; and
- Monitoring and Enforcement – How implementation of action will be monitored and enforced.

The Trust's NEPA Compliance Manager will be responsible for monitoring compliance with the MEP. For measures outside the jurisdiction of the Presidio Trust, the MEP will ensure coordination with other agencies (for the most part, the NPS and the City and County of San Francisco), and will monitor and facilitate their implementation of measures. The status and results of mitigation monitoring will be made available to other agencies and to the public upon request.

VI. PUBLIC INVOLVEMENT AND AGENCY COORDINATION

Public involvement and comment have been critical in shaping the updated plan for the Presidio's future. The following section describes chronologically the public involvement program for the PTMP and EIS.

A. PUBLIC INVOLVEMENT

The process of updating the comprehensive plan for the portion of the Presidio under the Trust's jurisdiction took more than two years, and encompassed nine formal public meetings, thousands of public comments, and considerable public debate.

1. SCOPING PERIOD

Federal Register Notices and Scoping Period: Planning officially began on June 30, 2000, with a Federal Register notice of intent to prepare a Supplemental EIS[10] for the Draft Plan, and to hold two public scoping meetings to determine the scope of impact topics and alternatives to be addressed in the Draft EIS (65 FR 40707-08). On October 11, 2000, the Trust published in the Federal Register a second notice to add a third public scoping meeting, to make factual corrections, and to extend the previously announced scoping period from November 15, 2000 to December 8, 2000 (65 FR 60477-60478). In response to several requests from commenting organizations and members of the public, the Trust announced in a third Federal Register notice an additional extension of the public scoping period to January 15, 2001, to enable the public to fully review, evaluate, and comment on the alternatives prior to their being analyzed in the Draft EIS (65 FR 67783).

Public Workshops: To ensure identification of the full range of issues and alternatives related to the Draft Plan and Draft EIS, the Trust invited all persons affected by or otherwise interested in the updated plan to participate in determining the scope and significance of issues to be analyzed in the Draft EIS by submitting written comments, or by attending one or more of four community workshops. During the extended 6-month scoping period, about 470 people attended the workshops, many of whom provided written and oral comments during the meetings. The Trust announced the times and locations of the workshops in a variety of media, including publication in the Federal Register and the Presidio Post (the Trust's monthly publication), notification to persons on the Trust's mailing list (approximately 9,000 persons and organizations at that time) and those that called or wrote requesting notice of subsequent events concerning the planning process, and posting on the Trust's web site (www.presidiotrust.gov).

At the first scoping meeting, held on July 12, 2000, the Trust provided information summarized from past planning workshops and other public outreach sessions, and sought the public's input on topics including Planning Principles, Presidio programs, transportation, housing, visitor services, and land use for purposes of both developing a reasonable range of alternatives, and identifying specific impacts to be evaluated in the Draft EIS. During the second workshop, held on September 13, 2000, the Trust focused on the Trust Act's financial self-sufficiency mandate, and introduced the financial modeling approach to be used to compare the planning alternatives. At that workshop, the Trust summarized and solicited comments on financial modeling concepts that would be used to assess, confirm and compare the financial viability of each alternative evaluated in the Draft EIS. After the July and September workshops, the Trust distributed mailers seeking public comments on both workshop topics, and provided a summary of public comments from the July workshop.

Using the information from the first two workshops and other public input, the Trust proposed for public comment the conceptual alternatives to be addressed in the EIS, and proposed visions for the Presidio's future at a third workshop held on November 15, 2000. The fourth and final workshop during public scoping was hosted on December 13, 2000, at which time the Trust responded to clarifying questions and listened to comments on the information presented to date. The Trust made available for public review and inspection complete transcripts and copies of the materials from the September, November, and December workshops on the Trust's website and at the Trust's library.

Conceptual Alternatives Workbook: As part of the third scoping workshop, the Trust released the Conceptual Alternatives Workbook to summarize the information presented at the November 15, 2000, workshop. The purpose of the workbook was to seek public input on topics that would form the foundation of the plan update and environmental review. The first part of the workbook summarized information about the planning process and context. Next, key elements of the plan update — the Trust's proposed vision statement and Planning Principles — were presented for public review and comment. Finally, five preliminary conceptual plan alternatives were presented. The workbook also included a response form for use by the public to evaluate the concepts presented, select ideas they believed to be best for incorporation into the Draft EIS alternatives, and to describe their own concept of a plan alternative if not already represented among the alternatives proposed.

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[10] In accordance with 40 C.F.R § 1502.4, the PTMP EIS tiers from and supplements the Final GMPA EIS prepared by and finalized by the NPS in 1994 and considers the environmental effects of proposed changes to the GMPA under each alternative. For ease of reference, the PTMP EIS is referred to herein and throughout the planning process as the EIS rather than the Supplemental EIS.

In presenting the conceptual alternatives for public consideration, the Trust, using a 20-year financial model common to all alternatives, provided a preliminary financial analysis for each alternative. To fully explain the summary financial results, the Trust also provided financial spreadsheets detailing the financial inputs, and made publicly available a compendium of all financial assumptions, together with supporting documents, used in assessing the financial viability of each alternative. Each of the detailed preliminary financial summaries was made publicly available prior to the final public scoping workshop. By this means, as part of scoping, the Trust received and considered comments on the approach to the financial comparison of alternatives.

2. PUBLIC REVIEW OF DRAFT PLAN AND DRAFT EIS

Inviting Public Comment: The Trust released the Draft Plan and Draft EIS for public review and comment on July 25, 2001. On that date, the Trust held a widely noticed public meeting to brief the public on the contents of the Draft Plan and Draft EIS, and to encourage participation in the review process. Copies of the documents were distributed at the July 25 meeting, as well as information on the upcoming public hearings, the closure date for the comment period, and other pertinent information. The Environmental Protection Agency (EPA) published a notice of availability for the Draft EIS in the Federal Register on July 27, 2001 (66 FR 39161). The Trust also published a notice of availability in the Federal Register on July 26, 2001 (66 FR 39058-59) and announced through other means the availability of the Draft EIS, where and how it could be reviewed, and the date and location of public hearings to comment on the document. An announcement was also provided in the Presidio Post (the Trust's monthly publication) and on the Trust's web site (www.presidiotrust.gov).

The Presidio Trust initially provided a 60-day comment period for the Draft EIS ending September 25, 2001. In response to several requests from commenting organizations and other parties, the Trust elected to extend this period by 30 days to October 25, 2001 (66 FR 46296). The Trust provided the longer 90-day review period to further enhance the opportunities for public and agency participation in the NEPA process. More than 700 Draft EISs were distributed to interested agencies, organizations and individuals. The Draft EIS was also made available for review at the Presidio Trust library, park headquarters, local libraries, the Presidio's William Penn Mott Visitor Center, and on the Presidio Trust's website (www.presidiotrust.gov).

Public Hearings: Members of the public interested in making oral comments for the record were provided that opportunity at three public hearings: a Golden Gate National Recreation Area Citizens' Advisory Commission meeting held on August 28, 2001; a Presidio Trust Board of Directors meeting on September 17, 2001; and a Presidio Trust public hearing on October 16, 2001 (official transcripts from the three formal meetings are available for review in the Presidio Trust library). In addition, the Presidio Trust held a number of informal meetings with various government agencies, organized interest groups, and neighbors to provide information, answer questions, and encourage written comments.

Public Comment: During the extended 90-day public review and comment period, the Trust received a total of 264 comment letters, 135 e-mails, and 2,657 electronic form letters on the Draft EIS and Draft Plan. In addition, oral comments were provided at the three public hearings held during the review period. Comments ranged from individual recommendations, opinions or preferences for the various alternatives to criticism of the Draft Plan and Draft EIS. The Trust carefully reviewed, evaluated, and considered all of the public comment, and Volume II of the Final EIS (Response to Comments) is dedicated to summarizing and responding to these comments. In responding to public comments, the Trust made several refinements to the Plan and EIS, and an overview of the primary changes is provided in the Introduction to the Final EIS. For a detailed discussion of the public comments, responses, and changes made to the Plan and EIS, please refer directly to the EIS Response to Comments (Volume II).

3. RELEASE OF FINAL EIS AND PROPOSED FINAL PLAN

The Trust released the Final EIS together with the proposed Final Plan document at a public meeting of the Trust's Board of Directors held on May 21, 2002. Notice of the meeting and of the availability of the Plan and Final EIS was widely distributed in advance by publication in the Trust's monthly newsletter, the Presidio Post, and in the Federal Register (67 FR 20846 (April 26, 2002)(Notice of Public Board Meeting) and 67 FR 32070 (May 13, 2002)(Notice of

Availability of the PTMP and Final EIS)). At the meeting, the Trust summarized major comment themes on the Draft Plan and EIS and noted modifications to the text of the Plan and related adjustments to the EIS that had been made in response to public comment. EPA published its Notice of Availability of the PTMP Final EIS (67 FR 36592) on Friday May 24, 2002, starting the 30-day "no-action" and review period for the Final EIS required by NEPA.

In order to allow the public an opportunity to ask questions and express views to the Trust on the proposed Final Plan, the Trust held a second public meeting of the Trust's Board on June 13, 2002, concerning the Final Plan and EIS. The Trust announced the meeting at the public session on May 21, 2002, as well as in the Presidio Post and the Federal Register (67 FR 36939 (May 28, 2002)).

The Trust received a variety of public input during the "no-action" period for the Final EIS, and has determined that none of the input raises any new issues or new concerns that would warrant modifications to the Final Plan or EIS. See Section VIII, below and Attachment 2 (Report Accompanying the ROD) for more detail.

B. AGENCY COORDINATION AND CONSULTATION

In November 2000, the Trust provided background information regarding the planning and environmental review process for the Draft Plan, including the Conceptual Alternatives Workbook, to federal, state, regional, and local agencies and requested their participation in "scoping" the plan update. The Trust consulted with interested agencies throughout the planning process.

1. COORDINATION WITH NPS

During the course of the planning and environmental review process leading up to the Draft Plan and Draft EIS, the Trust held regular coordination meetings with the NPS. The intent of the meetings was to exchange information on key issues of interest to both agencies. The Trust provided funding support for a planning liaison within the NPS. The liaison coordinated input to the Trust from all NPS branches during preparation of the Draft EIS, and helped identify and address key Plan issues that would affect Area A of the Presidio.

NPS reviewed and provided comments on the Trust's written scoping materials, including the Conceptual Alternatives Workbook summarizing proposed alternatives for study. After the close of scoping, the Trust held several focused sessions to review how the Trust was addressing NPS' scoping comments and comments on the EIS alternatives and on preliminary draft sections of the Plan. Trust staff with specific technical expertise met with counterpart staff within NPS to ensure technical and factual information was reviewed and adjusted. The Trust also hosted several focused sessions with NPS on the following topics: open space/natural resources. interpretation/programs, transportation and parking management, cultural resources, and sustainability. Each of the sessions included informal presentations, review of existing policies and proposed principles, and discussions on the subjects. Further meetings with NPS focused on receiving comments on the internal administrative review draft of the Draft Plan and the Draft EIS.

Trust staff briefed their NPS counterparts on the contents of the Final Plan proposal as it was being developed, and explained the ways in which key NPS comments and concerns were being addressed in modifications to the Plan. Although Trust staff did not always come to full agreement with NPS staff during the planning process, NPS' views were an important influence on the outcome. The Final Plan's focus on resource preservation was largely in response to the NPS's suggestion: "The Presidio's unique park character — its significant cultural, natural, scenic and recreational resources — must be the cornerstone that guides our vision." (NPS comment letter to Trust, October 25, 2001).

2. CONSULTATION UNDER THE NATIONAL HISTORIC PRESERVATION ACT

The Trust initiated National Historic Preservation Act (NHPA) consultation early in the planning process with the State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation (ACHP). The consultation resulted in a Programmatic Agreement covering operations, maintenance, leasing, and rehabilitation activities as well as a framework for addressing future planning and implementation activities under PTMP. See Volume III of the Final EIS,

Appendix D. Parties to the Programmatic Agreement include the SHPO, ACHP, NPS, the Trust, and two concurring parties: the National Trust for Historic Preservation and the Fort Point and Presidio Historical Association.

3. ENDANGERED SPECIES ACT CONSULTATION WITH USFWS

The Presidio provides a variety of habitats that support species protected pursuant to the Federal Endangered Species Act (ESA) of 1973, as amended. 16 U.S.C. §§ 1531 *et seq.* The Trust initiated consultation under Section 7 of the ESA with the U.S. Fish and Wildlife Service (USFWS) to ensure that the proposed plan update would not jeopardize the continued existence of listed species or critical habitat. The Trust submitted a Biological Assessment to the USFWS on November 26, 2001. On July 23, 2002, the USFWS issued its opinion letter stating "After reviewing the . . . effects of the proposed action and the cumulative effects, it is the Service's biological opinion that the project, as proposed, is not likely to jeopardize the continued existence of these species." Minimization measures included in the opinion letter mirror those included in the MEP provided for in Section V, above. A copy of the USFWS opinion letter is available for public review, and is incorporated herein by reference.

4. CONSULTATION WITH BCDC REGARDING COASTAL ZONE CONSISTENCY

Although the area under Trust jurisdiction does not lie within shoreline areas, as defined by the McAteer-Petris Act, the Trust is required to review activities that may affect the Coastal Zone for consistency pursuant to the federal Coastal Zone Management Act. The San Francisco Bay Conservation and Development Commission (BCDC), the agency responsible for the coastal zone management program, is entitled to concur or object to the Trust's finding of consistency. The Trust included a finding of consistency in the Final EIS (Section 5.2.2), and submitted its determination to BCDC for review. The BCDC held a public hearing on the determination on July 18, 2002, and concurred with the Trust's findings on August 1, 2002: "the project is consistent, to the maximum extent practicable, with the Commission's amended coastal zone management program for San Francisco Bay." A copy of the BCDC's action is available for public review, and is incorporated herein by reference.

5. CONSULTATION WITH U.S. ENVIRONMENTAL PROTECTION AGENCY

Under NEPA and section 309 of the Clean Air Act, U.S. EPA is authorized to review and comment in writing on the environmental impact of any matter subject to NEPA and to refer to CEQ any matter determined to be unsatisfactory from the standpoint of public health, welfare, or environmental quality. The Trust consulted with EPA throughout the planning process. EPA reviewed the adequacy of the Draft EIS and rated the document as "EC-2: Environmental Concerns, Insufficient Information" requesting additional information on wetlands, traffic, and air quality. In its review of the Final EIS "EPA found that the document adequately addresses the issues we raised. Modifications to the DEIS are clearly identified, and changes to the project based on prior feedback from EPA, other agencies, and the public are thoroughly discussed. The revised project reduces impacts to the environment, and is responsive to the public's concerns regarding protection of the natural, cultural and historic resources within the Presidio. The Final Plan provides a good balance among competing visions for Area B of the Presidio." (U.S. EPA letter dated June 24, 2002).

VII. USE OF THE FINAL EIS

The PTMP is a policy and land use framework that is intended to guide future physical changes, land use, and management decisions for Area B. Both the PTMP and the Final EIS are programmatic in nature. Recommendations and analysis are a balance of site specific and general topics, planning principles, and planning districts. The Final EIS assesses potential impacts of PTMP and other alternatives by presenting and analyzing informed and reasonable assumptions regarding a future potential mix of land uses. These assumptions do not, in all cases, represent decisions regarding what will occur, but rather uses that are likely to occur within Area B of the Presidio under each of the alternatives.

Future, more specific land use proposals and management decisions will be assessed for conformance with the PTMP, and will be evaluated to determine consistency with the analysis and conclusions in the Final EIS. In some cases, future projects may proceed directly from the Plan and Final EIS without further extensive public process or further detailed

environmental analysis. In other cases, any future proposals with a potential for significant environmental effects that have not been previously analyzed in the PTMP Final EIS will warrant additional environmental review and further public participation. Any future analysis will be tiered from the PTMP Final EIS. The Trust will first determine the appropriate level of NEPA review, and will conduct additional analysis if required, tiering from the Final EIS. For all future projects, the Trust's NEPA Compliance Manager will determine the relevance and application of mitigation measures included in the Final EIS, consistent with the MEP described in Section V, above.

The Trust is committed to public participation during PTMP implementation. Although it is impossible to know the precise nature of public involvement that will be appropriate or required for any specific project whose scope is not currently proposed, PTMP Table 4.3 generalizes the opportunities for public involvement that will be available before important decisions are made in the future. All future actions will be carried out in accordance with NEPA and its implementing regulations.

VIII. REPORT ACCOMPANYING THE ROD

During the "no action" period for the Final EIS (May 24 through August 23, 2002), a number of parties submitted written comments. All issues raised by comments received during the review period have been carefully considered by the Presidio Trust. The comments received raised no new issues that require modification of the proposed action. A summary of and responses to these comments are provided in Attachment 2 (Report Accompanying the ROD).

IX. ERRATA

Minor text changes and factual corrections to the PTMP and the Final EIS are provided in Attachment 3 (Errata Sheet). Changes were either initiated by the Trust to correct or clarify statements included in the documents, or were provided at the suggestion of others, based on comments received between publication of the documents and adoption of this ROD.

X. CONCLUSION

In accordance with the provisions of NEPA and the Trust's implementing regulations, the Trust has considered all of the information in the Final EIS and the complete record, including all public comments received. All of the above factors and considerations warrant selection of the Presidio Trust Management Plan (PTMP), identified as the Final Plan Alternative in the Final EIS, as the Trust's management plan for Area B of the Presidio of San Francisco.

The EPA published a Notice of Availability of the Final EIS in the Federal Register on May 24, 2002 (67 FR 36592). The required minimum thirty-day no action period ended on June 23, 2002. This decision will become effective immediately.

Dated: August 27, 2002

APPROVED: _____

DATE: _____

Craig Middleton
Executive Director, The Presidio Trust

ATTACHMENT 1

MITIGATION MONITORING AND ENFORCEMENT PROGRAM

Presidio Trust Management Plan (PTMP)
Mitigation Monitoring and Enforcement Program[1]

Mitigation Measure	Timing of Implementation	Responsibility for Implementation	Method of Implementation	Monitoring & Enforcement
Cultural Resources				
CR-1 *Documentation of Buildings to be Relocated or Removed.* Appropriate mitigating measures shall be determined in consultation with the California State Historic Preservation Officer, and the Advisory Council on Historic Preservation. Measures shall include recordation according to the Historic American Building Survey Standards. In addition, salvage, preservation, and curation of historic building fabric may be warranted in some situations.	Prior to relocation or removal of historic buildings or additions to historic buildings	Presidio Trust Federal Preservation Officer (FPO), staff and consultants	FPO to consult with agencies identified; agreed upon documentation and salvage activities to be required as conditions of project approval	FPO to describe in annual report per Programmatic Agreement (PA); project staff to provide confirmation of compliance with project conditions to NEPA Compliance Manager
CR-2 *Code Compliance*. The Trust shall upgrade buildings to meet life/safety standards and to comply with the Americans with Disabilities Act (ADA) as necessary. Rehabilitation of historic buildings shall include modification to meet applicable building codes to the extent practicable.	During rehabilitation of historic buildings	Project review staff and consultants, in consultation with the Presidio Fire Department and an historic preservation architect	Permit review process to ensure plans meet life safety and Americans with Disabilities Act (ADA) requirements prior to project approval; historic preservation architect to review plans to ensure historic building code has been applied as appropriate	FPO to monitor project review process and provide confirmation to NEPA Compliance Manager

[1] These mitigation measures were established during development and public review of the PTMP EIS. They are set forth in the Final EIS, and are being adopted and implemented by the Trust as part of the Record of Decision (ROD).

RECORD OF DECISION

Attachment 1 – Mitigation Monitoring and Enforcement Program

Presidio Trust Management Plan (PTMP) **Mitigation Monitoring and Enforcement Program**[1]				
Mitigation Measure	**Timing of Implementation**	**Responsibility for Implementation**	**Method of Implementation**	**Monitoring & Enforcement**
CR-3 *Long-Term Maintenance & Preservation of Vacant Buildings*. The Trust shall ensure that tenants perform continued maintenance, thereby preventing damage to historic features and ensuring that buildings are adequately maintained. A preservation and maintenance program for unoccupied buildings shall include: regular inspections, necessary stabilization work to ensure long-term preservation and safe conditions for park visitors; monitoring of the condition of vacant buildings; and prioritization of stabilization and rehabilitation needs to ensure the maximum feasible preservation and protection of park resources.	As applicable, Trust and/or non-residential tenants to meet requirements on an ongoing basis; Trust to develop overall program for residential and unoccupied buildings in FY2003, and to implement on an ongoing basis thereafter	Non-residential tenants, Presidio Trust FPO/Presidio Trust residential and non-residential property management staff and consultants	Non-residential leases to require maintenance as a condition; FPO to oversee development of a cyclical maintenance plan in FY03; annual improvements included in Trust's work programs and capital plan as feasible; Presidio Trust staff and contractors to implement required provisions for residential and vacant properties on an annual basis	Non-residential property management staff and consultants to oversee compliance with lease conditions; completion of cyclical maintenance plan confirmed with NEPA Compliance Manager
CR-4 *Future Planning to Guide Demolition and New Construction.* The Trust shall solicit public input, conduct appropriate environmental analysis, and engage in a consultation process with historic preservation agencies as stipulated in the Programmatic Agreement. Future projects shall conform to the Final Plan Planning Principles, Planning District Guidelines, and the Secretary of the Interior's Standards, in a manner that assures the preservation of the NHLD.	Before implementing projects that involve historic building demolition, major new construction or significant changes to the Presidio's historic landscape	Presidio Trust FPO and planning staff	FPO and planning staff to solicit input during NEPA process and NHPA consultation	FPO and NEPA Compliance Manager to ensure compliance with NEPA and NHPA, including specified consultation

Presidio Trust Management Plan (PTMP)
Mitigation Monitoring and Enforcement Program[1]

Mitigation Measure	Timing of Implementation	Responsibility for Implementation	Method of Implementation	Monitoring & Enforcement
CR-5 *Historic Forest Preservation and Rehabilitation.* The Trust shall complete studies regarding the character of the Presidio's historic forest, and implementation strategies to guide future actions consistent with the objectives for the historic forest zone within the Presidio Vegetation Management Plan. Strategies shall identify appropriate replacement species, tree stand management options, and exact areas for tree removal.	Historic forest character study and five-year implementation program to be completed in 2002; implementation ongoing	Presidio Trust staff and contractors	Presidio Trust staff and consultants to complete historic forest study and implementation strategy; reforestation activities provided for in Trust's work program and capital plan as feasible; staff, contractors, and Park Stewardship Program to undertake tree removal, cultivation, and reforestation over time	Completion of historic forest character study and implementation program to be confirmed with NEPA Compliance Manager
CR-6 *Monitor Visitor Impacts on Sensitive Resources.* The Trust shall monitor sensitive cultural resources, such as historic landscape features and vacant structures, and prioritize actions to reduce any adverse impacts on these resources caused by park visitors and new uses. Potential remedies may include temporary closure of areas, protective barriers, and informational signs.	Ongoing	Presidio Trust FPO and staff	Visual observation by Presidio Trust staff communicated to FPO for development and implementation of remedies	FPO to provide periodic confirmation to NEPA Compliance Manager
CR-7 *Compliance with Standards for Building and Cultural Landscape Rehabilitation.* The Trust shall ensure that building rehabilitation projects conform with the Guidelines for Rehabilitating Buildings at the Presidio of San Francisco (NPS 1995). If new uses are proposed for historic buildings, or if residential buildings are proposed for subdivision, the Trust shall ensure that required building modifications conform with the Secretary of the Interior Standards for the Rehabilitation of Historic Properties (NPS 1992). For historic landscape rehabilitation, projects shall conform with the Secretary of the Interior's Guidelines for the Treatment of Cultural Landscapes.	Prior to historic building modifications or historic landscape rehabilitation	Presidio Trust FPO	FPO to review project plans in consultation with qualified staff, consultants, and signatories to PA as appropriate	FPO to document compliance in the annual report per PA

Presidio Trust Management Plan (PTMP) **Mitigation Monitoring and Enforcement Program**[1]				
Mitigation Measure	**Timing of Implementation**	**Responsibility for Implementation**	**Method of Implementation**	**Monitoring & Enforcement**
Archaeology				
CR-8 *Ongoing Identification of Historic Properties.* Consistent with requirements under Section 110 of the NHPA and the signed PA, the Presidio Trust will continue to evaluate for possible inclusion in the list of contributing resources, those buildings or structures which may become 50 years old or may have achieved exceptional significance since the 1993 NHL Update form was completed. These evaluations shall also encompass archeological discoveries.	Ongoing	Presidio Trust FPO and qualified archaeologist meeting the qualifications stipulated in the PA	FPO to periodically review buildings that become 50 years old; archaeologist to review subsurface discoveries	FPO to document compliance in Annual Report per PA
CR-9 Ground Disturbing Activities. Ground disturbing maintenance activities and construction projects shall be closely observed in the vicinity of sensitive archaeological areas to discover, document, protect, and manage the archaeological record of the Presidio. During the planning process for such projects, an Archaeological Management Assessment and Monitoring Program (AMA/MP) shall be prepared to determine whether archival research, subsurface coring or trenching, and/or test excavations are required prior to ground disturbance. Archaeological monitoring is appropriate in areas of predicted archaeological sensitivity or for sampling purposes in areas that are not considered sensitive when the natural ground surface is obscured by paving or fill, or in other instances where a pedestrian survey or archaeological testing cannot reasonably be accomplished. Any required archaeological monitoring shall be implemented in accordance with an AMA/MP, prepared by qualified personnel. If historic properties are discovered during implementation of an undertaking, a detailed report shall be prepared. Large-scale ground disturbing activities shall be monitored in accordance with an AMA/MP. Should circumstances arise where the Trust cannot address archaeological concerns in a manner consistent with the AMA/MP, the Trust shall notify the SHPO.	Prior to and during excavation at sensitive or other appropriate sites	Presidio Trust FPO in consultation with a qualified archaeologist per the PA	FPO to require excavation projects to undergo archeological review by qualified personnel prior to approval; AMA/MP prepared by staff and consultants for sensitive archeological areas prior to issuance of an approval to excavate; monitoring to occur during excavation; reporting and consultation, as necessary	FPO to monitor and document compliance in the Annual Report per PA
CR-10 *Archaeological Grid and Database*. The Trust anticipates that previously unidentified subsurface historic properties could be encountered within the NHLD boundary due to the placement of fill over some of the historic marsh areas, historic landfill depositions, and other modifications to the land over 218 years of military occupation. The Trust shall maintain an archaeological grid map and database of archaeological information for the Presidio, in cooperation with NPS. The map shall also identify those areas where additional research and inventory are required during future project planning phases.	Ongoing	Presidio Trust FPO in consultation with a qualified archaeologist and a Geographic Information System (GIS) specialist	Results of field investigations and discoveries to be provided to a GIS specialist with responsibility for maintaining the database	FPO to periodically review status of mapping and database

Presidio Trust Management Plan (PTMP)
Mitigation Monitoring and Enforcement Program[1]

Mitigation Measure	Timing of Implementation	Responsibility for Implementation	Method of Implementation	Monitoring & Enforcement
CR-11 *Excavation Permits.* The Trust shall continue its policy of requiring all excavation permits to undergo archaeological review by qualified personnel, as defined in Stipulation III of the PA, prior to initiation of the requested activity. The excavation clearance process is included as Appendix B to the PA.	Ongoing	Project review staff and consultants, in consultation with a qualified archaeologist	Excavation permits to be reviewed by qualified personnel prior to issuance	FPO to monitor permit review process and confirm compliance with NEPA Compliance Manager
CR-12 *Archaeological Management Plan for El Presidio*. The Trust shall prepare an Archaeological Management Plan (AMP) for the Spanish Colonial site known as "El Presidio de San Francisco." The AMP shall contain an inventory and evaluation of archival, architectural and archaeological features associated with this site; identify the likely presence of other significant features in the area; describe strategies for maintaining the site; contain standard operating procedures; establish programs to increase public awareness of this archaeological resource; recover data of archaeological significance; and provide for curation of archaeological collections and associated records. The AMP shall be subject to peer review by NPS, SHPO, and if deemed necessary by the Trust, other qualified personnel.	Draft AMP to be prepared in FY2003	FPO in consultation with a qualified archaeologist per the PA	Presidio Trust staff and consultants to prepare draft plan for review by SHPO and interested stakeholders	FPO to require as stipulated in PA, and to document progress in Annual Report per PA
CR-13 *Curation of Archaeological Collections*. All records associated with excavations and excavated materials not subject to NAGPRA that are deemed important for preservation shall be accessioned, catalogued, and managed in accordance with 36 CFR Part 79, "Curation of Federally-Owned and Administered Collections."	Following archaeological excavations	FPO in coordination with qualified archaeology and collections management professionals	Records and materials transmitted to Presidio archaeological facility following excavation	FPO to periodically review status and management of collections
CR-14 *Discoveries.* If it appears that an undertaking shall affect a previously unidentified property that could be eligible for inclusion in the National Register (NR), or could contribute to the NHLD, or affect a known historic property in an unanticipated manner, the Trust shall stop any potentially harmful activities in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the property until it concludes consultation with the SHPO.	Immediately following discovery	FPO in coordination with qualified archaeologist per the PA	Condition of project approval to be the presence of qualified personnel with authority to cease excavation upon discovery; archaeologist to consult with FPO and SHPO	FPO to maintain and require practices; project staff to confirm conformance with conditions to NEPA Compliance Manager

Presidio Trust Management Plan (PTMP) **Mitigation Monitoring and Enforcement Program**[1]				
Mitigation Measure	**Timing of Implementation**	**Responsibility for Implementation**	**Method of Implementation**	**Monitoring & Enforcement**
CR-15 *Treatment of Discoveries*. If the newly discovered property has not previously been included in or determined eligible for the NR and provisions for its treatment are not contained in an approved research design or AMA/MP, the Trust may assume that the property is eligible for purposes of the PA. The Trust shall notify NPS and SHPO at the earliest possible time and consult to develop actions that shall take the effects of the undertaking into account. The Trust shall notify the SHPO of any time constraints, and the Trust and the SHPO shall mutually agree upon timeframes for this consultation but not to exceed 30 days. If treatment of the discovery is not included in an approved research design or AMA/MP, the Trust shall develop written recommendations reflecting its consultation with NPS and SHPO and as necessary, shall present a plan and schedule to implement these recommendations.	At the earliest possible time following discovery	FPO in consultation with a qualified archaeologist per the PA	Notification, documentation, and analysis to be provided to NPS and SHPO as described	FPO to monitor compliance and describe within Annual Report per PA
Biological Resources				
NR-1 *Native Plant Communities.* To reduce the possibility of colonization by non-native plant species, areas of native vegetation disturbed by construction, infrastructure repair, and increased land use activities shall be immediately revegetated with native species. A site-specific revegetation plan shall be prepared for each construction project affecting areas of native vegetation. Revegetation needs shall be identified early to allow time to establish seedlings from onsite plants and thus avoid contamination of the gene pool. Wherever possible, planting materials (seeds and cuttings) from the local Presidio gene pool shall be used. The Trust shall support a native plant propagation center and nursery to ensure that local stock was available for use in revegetation. The Trust shall consult with the Soil Conservation Service, the California Native Plant Society, National Park Service, Golden Gate National Parks Association and other technical experts on native plant propagation techniques. All revegetation efforts shall be protected by buffers and/or barriers during establishment, and maintained and monitored for at least three years.	Following disturbance in areas of native vegetation	Presidio Trust Natural Resources Program Manager, staff and consultants in cooperation with the Presidio Park Stewardship Program	Plans, as necessary, to be identified annually for projects appearing in the Trust's capital plan; revegetation plan, consultation, and propagation to be made conditions of project approval	Natural Resources Program Manager or project staff to confirm compliance with NEPA Compliance Manager
NR-2 *Wildlife.* A wildlife survey of Area B shall be prepared as part of the Vegetation Management Plan (VMP). A monitoring program shall be established to identify potential cumulative and activity/site-specific impacts on birds and other species. From monitoring information, best management practices shall be developed to reduce any impacts.	Before completion of Phase I: Pre-Implementation of VMP	Presidio Trust Natural Resources Program Manager, staff and consultants	Conduct survey and monitoring activities, and define and apply BMPs	Natural Resources Program Manager to confirm compliance with NEPA Compliance Manager
NR-3 *Threatened, Endangered, Rare and Sensitive Species.* To ensure long-term protection and mitigate any visitor-related impacts, a Presidio-wide inventory and monitoring program for rare and endangered plant and animal species shall continue, and all populations shall be protected and restored. Future wildlife and aquatic species surveys shall be completed and if they uncover additional animal species of concern, management objectives shall be developed and programs implemented for the particular species.	Ongoing	Presidio Trust Natural Resources Program Manager, staff and consultants	Develop objectives/ programs; inventory, monitor, survey and respond, as necessary	Natural Resources Program Manager to confirm compliance with NEPA Compliance Manager

Presidio Trust Management Plan (PTMP)
Mitigation Monitoring and Enforcement Program[1]

Mitigation Measure	Timing of Implementation	Responsibility for Implementation	Method of Implementation	Monitoring & Enforcement
NR-4 *Special-Status Species.* Rare or endangered plant species, including any federal- and state-listed threatened and endangered species that are found to occur in the Presidio, shall be monitored annually and protected. Actions shall be taken to recover these species, and their habitats shall be enhanced. Any future rare or endangered species found on the Presidio shall also be afforded the same protection and restoration measures. All special-status wildlife shall be inventoried and monitored, and habitat shall be protected and restored. Restoration activities shall focus on actions necessary to recover the five federally-listed plant species found on the Presidio, and restore their associated habitat in compliance with the ESA. During future site-specific planning and environmental review, the Trust shall review future projects to ensure that proposed uses and activities are consistent with and help further the recovery objectives stated in any relevant adopted Recovery Plans.	Ongoing	Presidio Trust Natural Resources Program Manager, staff and consultants, in cooperation with the Presidio Park Stewardship Program	Review species on an annual basis and identify needed projects in the Trust's work programs and capital plan; review projects to ensure consistency with measures prior to project approval; undertake required restoration	Natural Resources Program Manager to confirm compliance with NEPA Compliance Manager
NR-5 *Wildlife and Native Plant Communities.* To protect wildlife and native plant communities, the Trust shall implement the following measures: • Schedule heavy equipment use, to the greatest extent feasible, to avoid areas where soils are wet and prone to compaction; • Implement non-native wildlife control measures; • Provide signage and/or other educational devices to encourage voluntary compliance with protection measures; • Prevent unnecessary vehicular and human intrusion and use into native and sensitive habitat communities from adjacent construction, demolition and intensive special events and recreation activities; • Prohibit the use of erosion control measures and mulches that contain non-native plant seeds; • Prohibit the use of irrigation, fertilizers, and herbicides in areas adjacent to, or up-gradient from sensitive biologic resources; and • Prepare interpretive materials and signage in areas of increased tenant use adjacent to natural habitat areas and sensitive native plant communities. In addition, during project planning, site construction of new development and planned intensive human activities shall be located at least 100 feet from the edge of existing native plant communities and/or assemblages. If this is not feasible, the following measures should be used: • Install protective fencing or other barriers around affected native plant communities and natural habitat; • Plant dense native vegetation buffers to discourage access by humans, pets, and equipment into the native plant communities and other sensitive natural habitats for wildlife;	During project planning and construction activities	Presidio Trust staff and contractors, in consultation with Natural Resources Program Manager	Incorporate measures into project planning or as conditions of project approval	Project staff to confirm compliance with NEPA Compliance Manager

Presidio Trust Management Plan (PTMP)
Mitigation Monitoring and Enforcement Program[1]

Mitigation Measure	Timing of Implementation	Responsibility for Implementation	Method of Implementation	Monitoring & Enforcement
• Regularly inspect the affected areas for any impacts or damage to biological resources; • Revegetate native plant areas affected by construction immediately with native plant species appropriate to the area and grown from local seed stock, to reduce the potential of colonization by non-native species. If a natural resource specialist determines that interim erosion control and site stabilization measures shall be beneficial, this measure shall be implemented prior to revegetation; • Prepare and implement site-specific restoration action and/or revegetation plans. Native plant material shall be grown and collected in and from Presidio resources; • Monitor potential impacts of these protected areas from increased visitor and tenant use and install and/or modify protective fencing if impacts to resources occur; and • Coordinate all future trail planning and recreational activities in areas adjacent to habitat restoration sites and sensitive wildlife habitat with an interdisciplinary team including a qualified biologist or natural resource specialist.				
NR-6 *Best Management Practices.* Establish and implement both Presidio-wide and site-specific best management practices for construction/demolition activities, development of new and/or expanded tenant and visitor activities, and special events adjacent to natural habitats.	Ongoing	Presidio Trust Natural Resources Program Manager, in consultation with staff and consultants	Incorporate BMPs into project plans and as conditions of project approval	Project staff to confirm compliance with NEPA Compliance Manager
NR-7 *Artificial Light.* Minimize the intrusion of artificial light into the night scene of ecosystems, and limit the level of human-caused sound during construction-related activities, public and tenant events, changed land use activities, overall plan development, and site planning. Restrict the use of artificial lighting to those areas where security, basic human safety, and specific cultural resource requirements must be met. Use minimal-impact lighting techniques, and shield the use of artificial lighting to prevent the disruption of the night sky, physiological processes of living organisms, and similar natural processes. Develop standard measures for lighting that ensure minimum disturbance to areas of natural darkness, and wildlife habitat, and reduce excess fugitive light in natural areas. Ensure no gain in light levels in natural habitats, to the greatest extent feasible. Develop and implement best management practices minimizing interior and exterior fugitive light and sound.	Ongoing	Presidio Trust Natural Resources Program Manager, landscape designers, project staff, and contractors	Incorporate event and construction lighting, noise controls, and other measures into project planning or require as conditions of project approval	Project staff to confirm compliance with NEPA Compliance Manager
NR-8 *Natural Sounds.* Identify areas important to natural soundscapes, both for recreation and wildlife, and monitor when construction, special events or other activities occur that could be detrimental to this value. Identify mitigation measures on a project-specific basis, which could include seasonal restrictions based on nesting activity.	Ongoing	Presidio Trust Natural Resources Program Manager, project staff, and contractors	Require event and construction noise controls as conditions of project approval	Project staff to confirm compliance with NEPA Compliance Manager

Presidio Trust Management Plan (PTMP)
Mitigation Monitoring and Enforcement Program[1]

Mitigation Measure	Timing of Implementation	Responsibility for Implementation	Method of Implementation	Monitoring & Enforcement
NR-9 *Wildlife and Wildlife Habitat.* To reduce the effects on wildlife and wildlife habitat during implementation of future projects: • A qualified wildlife biologist shall conduct a site visit during project planning and assess the potential for any sensitive wildlife species, including bats, or their habitat to occur on or adjacent to the project site. If sensitive animal species are found, the project shall be redesigned or project timeline modified in accordance with the biologist's recommendations to avoid impacts. If avoidance is not feasible, species-specific and site-specific mitigation plans shall be developed, and regulatory agency consultation pursued (if needed) to mitigate direct take and replace habitat for the impacted species; and • Any vegetation removal shall follow the park guidelines for protection of nesting birds. This includes guidelines on timing of vegetation and removal.	Prior to site-specific construction activities	Presidio Trust Natural Resources Program Manager, project staff, and contractors	Require survey and limit timing in project planning or as a condition of project approval	Project staff to confirm compliance with NEPA Compliance Manager
NR-10 *Crissy Field Marsh.* No long-term leasing or new construction shall be allowed in the area between the Commissary parking lot and the historic Mason Street warehouses for two years, which is the estimated duration of the Crissy Field Marsh Expansion Technical Study. Following the study, restoration planning and implementation efforts shall be undertaken by the Trust in coordination with the NPS, GGNPA and other stakeholders, and long-term leasing or new construction shall be avoided in any agreed upon expansion area(s).	Ongoing	Presidio Trust Real Estate Director	Restrict activities in area specified during period specified	NEPA Compliance Manager to monitor compliance on an ongoing basis
NR-11 *Nike Missile Site.* Proposed uses of the Nike Missile site shall be designed or otherwise conditioned to minimize changes in the local hydrology such that the existing wetland and lessingia habitat near the PHSH is not adversely impacted.	Ongoing	Presidio Trust Natural Resources Program Manager and project staff	Require modifications and controls in project planning or as conditions of project approval	Project staff to confirm compliance with NEPA Compliance Manager
NR-12 *Cumulative Activities.* Cumulative disturbance to natural habitat areas shall not exceed 20 acres within any given year. No more than 5 acres of that disturbance should be concentrated within one wildlife corridor, sensitive habitat or plant community without approval from a professional ecologist. This shall not apply to disturbances created by natural storm or environmental events, which, if such events occur, shall be restored or treated consistent with natural resources objectives. If this threshold value must be exceeded, then a professional ecologist shall approve a strategy for implementing the proposed projects, and shall identify any additional resource protection mitigation prior to the implementation of specific projects. Any projects that contribute to exceeding the value shall have approved biological monitoring guidelines in place.	Annually and prior to site-specific project implementation	Presidio Trust Natural Resources Program Manager, staff and consultants	Review capital projects list on an annual basis, and revise for conformity with measure as required; develop strategies and identify additional measures or guidelines, as needed	Natural Resources Program Manager to confirm compliance with NEPA Compliance Manager

Presidio Trust Management Plan (PTMP) **Mitigation Monitoring and Enforcement Program[1]**				
Mitigation Measure	**Timing of Implementation**	**Responsibility for Implementation**	**Method of Implementation**	**Monitoring & Enforcement**
Water Resources				
NR-13 *Wetlands Compliance.* As further details about site-specific activities affecting wetlands and stream corridors are developed, the Trust shall undertake applicable compliance steps, including obtaining any necessary permits, under the Clean Water Act Section 401, 402 and 404 programs.	Prior to site-specific project implementation	Presidio Trust Natural Resources Program Manager	Comply with Clean Water Act Section 401, 402 and 404 Programs, including obtaining permits required by law	Regulatory agencies are responsible for ensuring compliance with the Clean Water Act
NR-14 *Visitor Management.* To reduce potential visitor impacts on wetlands, adjacent storm drainages and other areas meeting wetland criteria, visitor numbers and uses shall be monitored on a recurring basis, and measures shall be taken to reduce impacts as necessary. Informational leaflets, wayside signs, and regulatory measures shall be employed as warranted.	Ongoing	Presidio Trust Natural Resources Program Manager and staff	Monitor visitors on an ongoing basis; undertake listed activities on an as needed basis	Natural Resources Program Manager to periodically confirm compliance with NEPA Compliance Manager
NR-15 *Best Management Practices.* The Trust shall develop and employ Best Management Practices including but not limited to: • Maintaining appropriate erosion and siltation controls during construction, and permanently stabilizing all exposed soil or fill; • Initiating water conservation programs and waste disposal programs for Trust operations as well as for residents and tenants, including education and monitoring. • Ensuring that all newly constructed impervious surfaces prevent, to the greatest extent feasible, increased water runoff volume and velocity, reduced water quality and reduced water infiltration. • Ensuring protection of normal movement, migration, reproduction, or health of aquatic fauna, including low flow conditions; • Properly maintaining structures or fill so as to avoid adverse impacts to aquatic environments and public safety; • Placing excavated fill on non-sensitive upland sites, and stabilizing all material with compatible erosion control techniques; and • Monitoring storm drain run-off into Crissy Field Marsh and implementing measures to reduce any high levels of organics, sedimentation and contaminants.	Ongoing	Presidio Trust Director of Operations, Natural Resources Program Manager, staff, and contractors	Require design features and construction measures in project planning or as conditions of project approval; develop, communicate, and monitor operational strategies and undertake required maintenance on an ongoing basis	Project staff to confirm compliance with NEPA Compliance Manager

Presidio Trust Management Plan (PTMP)
Mitigation Monitoring and Enforcement Program[1]

Mitigation Measure	Timing of Implementation	Responsibility for Implementation	Method of Implementation	Monitoring & Enforcement
NR-16 *Future Design.* Projects shall be designed to preserve and avoid unique geologic, subsurface and surface water features, such as semi and confined aquifer systems, during construction, and demolition activities to the greatest extent feasible. Future projects shall also be designed or otherwise conditioned to achieve the following: prevent interference with groundwater recharge such that there is no net deficit in aquifer volume or a lowering of, or obstruction to the groundwater table; and prevent alterations in drainage patterns, currents or course of direction of water movements.	Prior to project approval	Qualified project staff and consultants	Require design and construction measures as conditions of project approval	Project staff to confirm compliance with NEPA Compliance Manager
NR-17 *Demolition and Construction Activities.* Proposed demolition, new (replacement) construction and intensive human activities shall be sited at least 100 feet (or greater distance if deemed necessary to avoid indirect effects) from the edge of existing wetlands, seeps, riparian vegetation or from the top of bank of unvegetated stream channels where feasible. If this is not feasible, the following measures shall be used: • install fencing or other barriers adjacent to affected wetlands, streams and associated habitats to prevent inadvertent human, pet or equipment access in wetland systems. Other barriers could include the planting of dense native vegetation; • regularly inspect the affected areas to enforce compliance; and/or • provide signage and/or other educational devices to encourage voluntary compliance.	Prior to and during construction activities	Presidio Trust planning and design staff, consultants, project staff, and contractors, all in coordination with Natural Resources Program Manager	Require any necessary design modifications or construction measures as conditions of project approval	Project staff to confirm compliance with NEPA Compliance Manager
NR-18 *Compensation.* If it is not feasible to avoid losses to wetland or associated groundwater resources, the Trust shall compensate for lost extent and value by implementing a compensatory mitigation program with quantifiable performance criteria and monitoring to document success. Corrective actions shall be implemented if restoration success is not demonstrated through an adaptive management approach until all performance criteria are attained.	Prior to, during, and after project implementation	Presidio Trust Natural Resources Program Manager, staff, and consultants	Identify mitigation site and establish performance criteria prior to project approval; implement compensatory improvements and monitor on an ongoing basis as needed	Project staff to confirm compliance with NEPA Compliance Manager
NR-19 *Future Design.* Projects shall be designed to prevent alterations to drainage patterns or water movement in a manner that could result in erosion or siltation on or off site; prevent substantial runoff water which could exceed the capacity of either existing or planned storm water drainage systems, or the infiltration rates of surrounding soils; and prevent additional sources of polluted runoff.	Prior to project implementation	Qualified project staff and consultants	Identify, design modifications and controls as conditions of project approval	Project staff to confirm compliance with NEPA Compliance Manager

Presidio Trust Management Plan (PTMP) **Mitigation Monitoring and Enforcement Program**[1]				
Mitigation Measure	**Timing of Implementation**	**Responsibility for Implementation**	**Method of Implementation**	**Monitoring & Enforcement**
Air Quality				
NR-20 *Basic Control Measures.* To reduce construction-generated particulate matter (PM_{10}) emissions, construction contractors shall implement as appropriate the BAAQMD's recommended control measures for emissions of dust during construction. Basic control measures are: • water all active construction areas at least twice daily; • cover all trucks hauling soil, sand, and other loose materials or require trucks to maintain at least 2 feet of freeboard; • pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas; • sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas; and • sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets.	During construction activities	Project staff and contractors	Require control measures as a condition of project approval	Project staff to confirm compliance with NEPA Compliance Manager
NR-21 *Transportation Control Measures (TCMs).* The Presidio Trust Transportation Demand Management (TDM) Program shall implement the TCMs of the 2000 Clean Air Plan (CAP) (identified on page 125 of final EIS) to minimize air emissions from Presidio-related activities. In addition, consistent with the 2000 CAP, the Trust shall coordinate land uses to provide buffer zones and avoid conflicts from toxic contaminants or odors.	Ongoing	Presidio Trust Transportation Demand Management (TDM) Coordinator and planning staff	Include CAP measures in Presidio Trust TDM Program; make coordination, buffers, and conflict avoidance a condition of project approval	Project staff to confirm compliance with NEPA Compliance Manager
NR-22 *Deconstruction/Demolition Techniques.* To the extent feasible, the Trust shall apply an environmentally effective approach, including a combination of deconstruction and demolition techniques, to remove outdated structures and to reduce PM_{10} emissions from demolition activities.	Prior to and during construction activities	Project staff and contractors	Identify feasible techniques during project planning and require as a condition of project approval	Project staff to confirm compliance with NEPA Compliance Manager

Presidio Trust Management Plan (PTMP)
Mitigation Monitoring and Enforcement Program[1]

Mitigation Measure	Timing of Implementation	Responsibility for Implementation	Method of Implementation	Monitoring & Enforcement
Noise				
NR-23 *General Construction/Demolition Noise.* During construction, contractors and other equipment operators shall be required to comply with the San Francisco Noise Ordinance (San Francisco Municipal Code, Section 2907b), which requires that each piece of powered equipment, other than impact tools, emit noise levels of not more than 80 A-weighted decibels (dBA) at 100 feet. To reduce noise impacts, barriers shall be erected around construction sites and stationary equipment such as compressors; this shall reduce noise by as much as 5 dBA. To further reduce noise impacts on visitors, some construction sites shall be temporarily closed, and appropriate barriers placed at a distance of 250 feet from the sites.	During construction activities	Project staff and contractors	Require noise measures as conditions of project approval for relevant projects	Project staff to confirm compliance with NEPA Compliance Manager
NR-24 *Traffic Noise Reduction.* The Trust shall use and encourage other city and transit providers to select transit vehicles that produce less noise pollution. Energy-conserving government vehicles shall be used by maintenance and other divisions. If possible, electric or other alternative vehicles shall be used to reduce noise levels.	Ongoing	Presidio Trust fleet manager in coordination with transportation staff	Investigate and incorporate appropriate vehicles into the Trust fleet as feasible on an ongoing basis; Trust transportation staff to communicate feasible measures to other transit providers	Fleet manager to provide NEPA Compliance Manager with periodic updates
NR-25 *Traffic Noise Monitoring and Attenuation.* Noise levels shall be periodically monitored at the San Francisco National Cemetery and the World War II Memorial. Noise attenuation measures shall be instituted, if feasible, if noise levels exceed the Noise Abatement Criteria standards. Examples of attenuation measures include sound barriers or berms, vehicle restrictions, and traffic calming.	Periodic	Presidio Trust staff and consultants	Require noise monitoring for relevant projects in the vicinity; implement necessary attenuation measures, as feasible	Project staff to confirm compliance with NEPA Compliance Manager

RECORD OF DECISION

Attachment 1 – Mitigation Monitoring and Enforcement Program

Presidio Trust Management Plan (PTMP) **Mitigation Monitoring and Enforcement Program**[1]				
Mitigation Measure	**Timing of Implementation**	**Responsibility for Implementation**	**Method of Implementation**	**Monitoring & Enforcement**
Land Use				
CO-1 *Monitoring of Area B Uses.* The Trust shall review proposed uses for specific buildings for their consistency with the PTMP Planning Principles to ensure protection of the Presidio's cultural, natural, scenic and recreational resources. The Trust shall also consult with NPS for all activities that have the potential to significantly affect Area A resources.	Prior to executing lease agreements	Presidio Trust real estate and planning staff	Review proposed uses prior to execution of a lease or project approval; consult as appropriate	NEPA Compliance Manager to review relevant projects for compliance
Socioeconomic Issues/Housing Supply				
CO-2 *Jobs/Housing Balance Monitoring.* Through the ongoing review of housing demand, occupancy and unit mix, progress towards the jobs/housing balance shall be monitored. Housing opportunities shall accommodate Presidio-based employees at a range of income levels.	Ongoing	Presidio Trust Residential Property Program Manager, planning staff, and consultants	Collect data from residential property management company on a monthly or quarterly basis, review regional data annually, and survey employees as necessary to monitor demand	NEPA Compliance Manager to review compliance on an annual basis
Schools				
CO-3 *Collaboration with SFUSD.* The Trust shall make all reasonable efforts to collaborate with San Francisco Unified School District (SFUSD) to locate necessary space for students residing at the Presidio and continue to participate in the Federal Impact Aid program.	Ongoing	Presidio Trust Executive Director	Maintain communications with SFUSD officials	NEPA Compliance Manager to periodically review compliance.
Visitor Experience				
CO-4 *Limitations of Visitor Opportunities.* The Trust shall limit visitor opportunities to those that are suited and appropriate to the significant natural, historic, scenic, cultural and recreational resources of the Presidio. Only those visitor activities that are consistent with the Trust Act and appropriate to the purpose for which the park was established shall be allowed. The Trust shall welcome tenants to provide activities consistent with these requirements.	Prior to implementing relevant projects or plans	Presidio Trust Director of Public Affairs/Programming and Director of Real Estate	Review proposed uses and events prior to project approval or lease execution	NEPA Compliance Manager to review relevant projects and plans for compliance

Presidio Trust Management Plan (PTMP)
Mitigation Monitoring and Enforcement Program[1]

Mitigation Measure	Timing of Implementation	Responsibility for Implementation	Method of Implementation	Monitoring & Enforcement
CO-5 *Prohibitions on Visitor Uses.* The Trust shall prohibit visitor uses that could impair park resources or values or unreasonably interfere with NPS interpretive activities or other existing, appropriate park uses. As future plans are developed for Crissy Field (Area B), the Trust shall cooperate with the NPS to the extent practicable to seek consistency with that agency's visitor management policies and procedures and improvements made to Area A. The Trust shall also consider the effects on Crissy Field's visitors (Area A) when determining the appropriateness of future visitor activities.	Prior to implementing relevant projects or plans	Presidio Trust public events and planning staff	Review proposed uses, plans, and activities and consult as necessary prior to project approval, plan adoption, or lease execution	NEPA Compliance Manager to review relevant projects and plans for compliance
CO-6 *Management Controls*. The Trust shall impose management controls on visitor uses, if necessary, to ensure that the Presidio's resources are protected. If an ongoing or proposed activity causes unacceptable impacts to park resources, adjustments shall be made to the way the activity is conducted, including placing limitations on the activity, so as to eliminate the unacceptable impacts. Any restrictions shall be based on professional judgment, law and policy, the best available scientific study or research, appropriate environmental review, and other available data. As visitor use changes over time, the Trust shall decide if management actions are needed to keep use at acceptable and sustainable levels.	Prior to implementing relevant projects or plans	Presidio Trust FPO, Natural Resources Program Manager, and other Trust staff	Review ongoing uses periodically; review proposed uses prior to project approval, plan adoption, or lease execution	NEPA Compliance Manager to review relevant projects and plans for compliance
CO-7 *Special Events*. The Trust shall require appropriate permit conditions for special events to ensure that park resources are protected.	Prior to events	Presidio Trust special events staff	Require measures as a condition of project approval for proposed events	Project staff to confirm compliance with NEPA Compliance Manager
CO-8 *Monitoring of Visitor Levels*. The Trust shall monitor visitation levels to ensure that park uses shall not unacceptably impact Presidio resources, including visitor experience. Visitor carrying capacities for managing visitor use shall be identified if necessary.	Prior to implementing relevant projects or plans	Presidio Trust planning and public events staff and consultants	Monitor visitor levels and assess limits if warranted	NEPA Compliance Manager to review relevant projects and plans for compliance
Recreation				
CO-9 *Recreational Use Management Objectives*. The Trust shall develop and implement specific, measurable visitor management objectives to ensure that recreational uses and activities within Area B could be sustained without impairing park resources or values. The Trust shall monitor changing patterns of use and trends in recreational activities, and assess and manage their potential effects on park resources.	During recreation planning and implementation	Presidio Trust planning and public programs staff	Develop a Presidio-wide recreation plan to set overall objectives; review, assess, and modify management, as needed	NEPA Compliance Manager to review relevant projects or plans for compliance

Presidio Trust Management Plan (PTMP) **Mitigation Monitoring and Enforcement Program**[1]				
Mitigation Measure	**Timing of Implementation**	**Responsibility for Implementation**	**Method of Implementation**	**Monitoring & Enforcement**
CO-10 *Relocation or Replacement of Recreational Facilities.* Should any recreational facilities need to be relocated in conjunction with other planning objectives, such as through the restoration of Tennessee Hollow or the reconfiguration of Doyle Drive, their relocation or replacement shall be pursued during activity- or planning area-specific analyses.	During project or district planning	Presidio Trust planning staff	Consider and evaluate relocation or replacement options during project or district planning	NEPA Compliance Manager to review relevant projects or plans for compliance
CO-11 *Trail Maintenance and Enhancement*. The Trust shall implement priorities for trail repair, stabilization and enhancement, and initiate a Trails Stewardship Program to promote public support and interest in trail maintenance and enhancement activities.	Following approval of a Presidio Trails and Bikeways Master Plan	Presidio Trust planning staff, in coordination with Trust's Natural Resource Program Manager, landscape crews and other staff, contractors, or workers	Identify priority trail improvements in the Trust's work programs and capital plan and implement as feasible; seek partner organizations to develop a trail stewardship program	NEPA Compliance Manager to periodically review compliance
Public Safety				
CO-12 *Expansion of Public Safety Services.* The Trust shall work with U.S. Park Police (USPP) and NPS public safety service providers to implement the Presidio Trust & NPS Law Enforcement Facility Study in order to maintain adequate services. The Trust shall work jointly with NPS to develop a building program to meet law enforcement needs and ensure that the final building program accommodates future growth.	Following completion of facilities plan update	Presidio Trust planning and real estate staff and consultants in consultation with NPS and USPP	Comprehensive study of NPS and Trust facilities needs, including USPP needs; building program to consider completed facility study for USPP and be developed jointly and implemented as feasible and necessary	NEPA Compliance Manager to review relevant projects or plans for compliance

Presidio Trust Management Plan (PTMP)
Mitigation Monitoring and Enforcement Program[1]

Mitigation Measure	Timing of Implementation	Responsibility for Implementation	Method of Implementation	Monitoring & Enforcement
Transportation and Circulation				
TR-1 *Presidio Avenue/Pacific Avenue Intersection.* Signalize the intersection to provide acceptable Level of Service (LOS). The Trust shall coordinate with the City and County of San Francisco (CCSF) to determine the contribution of each party to the cost of the improvements.	Prior to the intersection operations deteriorating to LOS E or F	CCSF and Trust transportation staff and consultants	Trust staff to monitor LOS periodically and coordinate with CCSF staff regarding the design and implementation of improvements when required; CCSF to implement as desired	NEPA Compliance Manager to review relevant projects for compliance when improvements are necessary
TR-2 *Arguello Boulevard/Jackson Street Intersection.* Signalize the intersection to improve LOS operation during the p.m. peak hour. The Trust shall coordinate with the CCSF to determine the contribution of each party to the cost of the improvements.	Prior to the intersection operations deteriorating to LOS E or F	CCSF and Trust transportation staff and consultants	Trust staff to monitor LOS periodically and to coordinate with CCSF staff regarding design and implementation of improvements when required; CCSF to implement as desired	NEPA Compliance Manager to review relevant projects for compliance when improvements are necessary
TR-3 *Lincoln Boulevard/25th Avenue/El Camino del Mar Intersection.* Install a traffic signal, and remove parking on the east side of 25th Avenue just south of Lincoln Boulevard in order to add a right turn lane to the northbound approach. The Trust shall coordinate with the CCSF to determine the contribution of each party to the cost of the improvements.	Prior to the intersection operations deteriorating to LOS E or F	CCSF and Trust transportation staff and consultants	Trust staff to monitor LOS periodically and to coordinate with CCSF staff regarding design and implementation of improvements when required; CCSF to implement as desired	NEPA Compliance Manager to review relevant projects for compliance when improvements are necessary

Presidio Trust Management Plan (PTMP) **Mitigation Monitoring and Enforcement Program**[1]				
Mitigation Measure	**Timing of Implementation**	**Responsibility for Implementation**	**Method of Implementation**	**Monitoring & Enforcement**
TR-4 *Lombard Street/Presidio Boulevard Intersection.* Signalize the intersection and widen the three legs of the intersection to add turn lanes to the northbound and westbound approaches and provide two exit lanes on the east and north legs of the intersection.	Prior to the intersection operations deteriorating to LOS E or F	Presidio Trust transportation staff and contractors/ consultants	Trust staff to monitor LOS periodically and to incorporate improvements into Trust's capital plan for implementation when required	NEPA Compliance Manager to review relevant projects for compliance when improvements are necessary
TR-5 *Arguello Boulevard/Moraga Avenue Intersection.* Signalize the intersection and provide an additional lane on the eastbound approach (also refer to Mitigation Measure TR-13 for additional improvements required at this intersection to provide acceptable operating conditions).	Prior to the intersection operations deteriorating to LOS E or F	Presidio Trust transportation staff and contractors/ consultants	Trust staff to monitor LOS periodically and to incorporate improvements into Trust's capital plan for implementation when required	NEPA Compliance Manager to review relevant projects for compliance when improvements are necessary
TR-6 *Lincoln Boulevard/Golden Gate Viewing Entrance Intersection.* Install stop signs on the Lincoln Boulevard approaches, and install an eastbound left-turn lane and westbound right-turn lane. If direct Presidio access to Doyle Drive is not provided, signalize the intersection to mitigate the operation of the intersection to LOS D or better. The Trust shall coordinate with the NPS and the Golden Gate Bridge Highway and Transportation District (GGBHTD) to determine the contribution of each party to the cost of the improvements.	Prior to the intersection operations deteriorating to LOS E or F	NPS, GGBHTD, and Trust staff and contractors/ consultants	Trust staff to monitor LOS periodically and to coordinate with NPS and GGBHTD regarding design and implementation of improvements when required; NPS to implement as desired or Trust to implement via an interagency agreement	NEPA Compliance Manager to review relevant projects for compliance when improvements are necessary

Presidio Trust Management Plan (PTMP)
Mitigation Monitoring and Enforcement Program[1]

Mitigation Measure	Timing of Implementation	Responsibility for Implementation	Method of Implementation	Monitoring & Enforcement
TR-7 *Lincoln Boulevard/Merchant Road Intersection.* Realign the intersections of Lincoln Boulevard/Merchant Road and Lincoln Boulevard/Storey Avenue to create a single signalized intersection with added left-turn lanes on both the eastbound and westbound approaches. If direct Presidio access to Doyle Drive is not provided, an exclusive right-turn lane may also be needed to mitigate the operation of the intersection to LOS D or better. This intersection is located at the boundary between Area A and Area B. Therefore, the Trust shall coordinate with the NPS to determine the contribution of each party to the cost of the improvements.	Prior to the intersection operations deteriorating to LOS E or F	Presidio Trust transportation staff in coordination with NPS	Trust staff to monitor LOS periodically and to coordinate with NPS and consult with GGBHTD regarding design and implementation of improvements when required; NPS to implement as desired or Trust to implement via an interagency agreement	NEPA Compliance Manager to review relevant projects for compliance when improvements are necessary
TR-8 *Lincoln Boulevard/Kobbe Avenue Intersection.* Realign Washington Boulevard to form a perpendicular intersection with Lincoln Boulevard, add left-turn lanes if necessary, and signalize the intersection. Convert Kobbe Avenue to a one-way eastbound street. If direct Presidio access to Doyle Drive is not provided, a southbound left-turn pocket may also be needed.	Prior to the intersection operations deteriorating to LOS E or F	Presidio Trust transportation staff and contractors/ consultants	Trust staff to monitor LOS periodically and to incorporate improvements into Trust's capital plan for implementation when required	NEPA Compliance Manager to review relevant projects for compliance when improvements are necessary
TR-9 *Bicycle and Pedestrian Amenities*. Provide bicycle and pedestrian amenities such as shelters, benches, water fountains, secure bicycle racks, route lighting, and other facilities throughout the Presidio to encourage travel by foot and bicycle.	Ongoing	Presidio Trust transportation and planning staff and contractors/ consultants	Physical improvements to be designed and implemented as feasible via Trust's capital plan	NEPA Compliance Manager to review relevant projects for compliance
TR-10 *Support Increased MUNI Frequencies*. Increase frequency of service on existing San Francisco Municipal Railway (MUNI) to increase the transit peak hour capacity, and consequently reduce passenger load factors on these lines.	Ongoing	MUNI and Trust transportation staff	Trust staff to coordinate with MUNI on an ongoing basis; MUNI to monitor and increase service as desired	NEPA Compliance Manager to review relevant projects for compliance when improvements are necessary

Presidio Trust Management Plan (PTMP)
Mitigation Monitoring and Enforcement Program[1]

Mitigation Measure	Timing of Implementation	Responsibility for Implementation	Method of Implementation	Monitoring & Enforcement
TR-11 *14th Avenue/Lake Street Intersection Improvements*. Designate the 15th Avenue gate for outbound traffic, and open the 14th Avenue gate for inbound traffic. Install a traffic signal at the intersection of 14th Avenue/Lake Street, and restripe the westbound approach to provide a left-turn lane. The Trust shall coordinate with the CCSF to determine the contribution of each party to the cost of the improvements.	Prior to the intersection operations deteriorating to LOS E or F	CCSF and Trust transportation staff and contractors/ consultants	Trust staff to monitor LOS periodically and to coordinate with CCSF staff regarding design and implementation of improvements when required; CCSF to implement as desired	NEPA Compliance Manager to review relevant projects for compliance when improvements are necessary
TR-12 *Lyon Street/Lombard Street Intersection Improvements*. Signalize the intersection and restripe the eastbound approach to provide an exclusive left-turn lane and a shared right-through lane. Without direct Presidio access to Doyle Drive, a southbound right-turn lane may also be needed at this intersection to mitigate the intersection operation to LOS D or better. It should be noted that there is an estimated width of 30 feet between the historic columns of the Lombard Street gate. While it will be possible to achieve three 11-foot wide lanes between the columns, large trucks may not be able to negotiate left or right turns at the gate without encroaching into the adjacent lane. Turn prohibitions for large vehicles will be implemented if necessary. The Trust shall coordinate with the CCSF to determine the contribution of each party to the cost of the improvements.	Prior to the intersection operations deteriorating to LOS E or F	CCSF and Trust transportation staff and contractors/ consultants	Trust staff to monitor LOS periodically and to coordinate with CCSF staff regarding design and implementation of improvements when required; CCSF to implement as desired	NEPA Compliance Manager to review relevant projects for compliance when improvements are necessary
TR-13 *Arguello Boulevard/Moraga Avenue Intersection Improvements.* Signalize and restripe the intersection to provide right-turn lanes on the northbound and eastbound approaches, and provide a left-turn lane on the westbound approach.	Prior to the intersection operations deteriorating to LOS E or F	Presidio Trust transportation staff and contractors/ consultants	Trust staff to monitor LOS periodically and to incorporate improvements into Trust's capital plan for implementation when required	NEPA Compliance Manager to review relevant projects for compliance when improvements are necessary
TR-14 *Letterman Drive/Presidio Boulevard/Lincoln Boulevard Intersection Improvements.* Install a signal, widen Presidio Boulevard and restripe the northbound left-turn lane to a shared left-through lane. An additional northbound lane shall be needed on Lincoln Boulevard north of Presidio Boulevard to accommodate this improvement.	Prior to the intersection operations deteriorating to LOS E or F	Presidio Trust transportation staff and contractors/ consultants	Trust staff to monitor LOS periodically and to incorporate improvements into Trust's capital plan for implementation when required	NEPA Compliance Manager to review relevant projects for compliance when improvements are necessary

Presidio Trust Management Plan (PTMP)
Mitigation Monitoring and Enforcement Program[1]

Mitigation Measure	Timing of Implementation	Responsibility for Implementation	Method of Implementation	Monitoring & Enforcement
TR-15 *14th Avenue/California Street Intersection Improvements.* Install STOP signs on the California Street approaches to this intersection and restripe to add a right-turn lane to the northbound approach. This improvement could require removal of some on-street parking spaces. The Trust shall coordinate with the CCSF to determine the contribution of each party to the cost of the improvements. Although installing STOP signs on California Street will improve the operation of this intersection to an acceptable LOS, queues on the westbound approach could potentially extend into the intersection of Park Presidio Boulevard/California Street. Therefore, if queues on the westbound approach to this intersection are determined to affect the operation of Park Presidio Boulevard/California Street, a traffic signal may be warranted at the intersection of 14th Avenue/California Street. A traffic signal at this location will adequately mitigate the operation of the intersection to an acceptable LOS.	Prior to the intersection operations deteriorating to LOS E or F	CCSF and Trust transportation staff and contractors/ consultants	Trust staff to monitor LOS periodically and to coordinate with CCSF staff regarding design and implementation of improvements when required; CCSF to implement as desired	NEPA Compliance Manager to review relevant projects for compliance when improvements are necessary
TR-16 *25th Avenue/California Street Intersection Improvements.* Restripe to add a left-turn lane to both the eastbound and westbound approaches of the intersection. This improvement may require removal of some on-street parking spaces. The Trust shall coordinate with the CCSF to determine the contribution of each party to the cost of the improvements.	Prior to the intersection operations deteriorating to LOS E or F	CCSF and Trust transportation staff and contractors/ consultants	Trust staff to monitor LOS periodically and to coordinate with CCSF staff regarding design and implementation of improvements when required; CCSF to implement as desired	NEPA Compliance Manager to review relevant projects for compliance when improvements are necessary
TR-17 *Presidio Avenue/Jackson Street Intersection Improvements.* Signalize the intersection. The Trust shall coordinate with the CCSF to determine the contribution of each party to the cost of the improvements.	Prior to the intersection operations deteriorating to LOS E or F	CCSF and Trust transportation staff and contractors/ consultants	Trust staff to monitor LOS periodically and to coordinate with CCSF staff regarding design and implementation of improvements when required; CCSF to implement as desired	NEPA Compliance Manager to review relevant projects for compliance when improvements are necessary

Presidio Trust Management Plan (PTMP) **Mitigation Monitoring and Enforcement Program**[1]				
Mitigation Measure	**Timing of Implementation**	**Responsibility for Implementation**	**Method of Implementation**	**Monitoring & Enforcement**
TR-18 *Presidio Avenue/Washington Street Intersection Improvements.* Signalize the intersection. The Trust shall coordinate with the CCSF to determine the contribution of each party to the cost of the improvements.	Prior to the intersection operations deteriorating to LOS E or F	CCSF and Trust transportation staff and contractors/ consultants	Trust staff to monitor LOS periodically and to coordinate with CCSF staff regarding design and implementation of improvements when required; CCSF to implement as desired	NEPA Compliance Manager to review relevant projects for compliance when improvements are necessary
TR-19 *Arguello Boulevard/Washington Street Intersection Improvements.* Signalize the intersection. The Trust shall coordinate with the CCSF to determine the contribution of each party to the cost of the improvements.	Prior to the intersection operations deteriorating to LOS E or F	CCSF and Presidio Trust transportation staff and contractors/ consultants	Trust staff to monitor LOS periodically and to coordinate with CCSF staff regarding design and implementation of improvements when required; CCSF to implement as desired	NEPA Compliance Manager to review relevant projects for compliance when improvements are necessary
TR-20 *Lincoln Boulevard/Girard Road Intersection Improvements.* Signalize the intersection.	Prior to the intersection operations deteriorating to LOS E or F	Presidio Trust transportation staff and contractors/ consultants	Trust staff to monitor LOS periodically and to incorporate improvements into Trust's capital plan for implementation when required	NEPA Compliance Manager to review relevant projects for compliance when improvements are necessary

Presidio Trust Management Plan (PTMP)
Mitigation Monitoring and Enforcement Program[1]

Mitigation Measure	Timing of Implementation	Responsibility for Implementation	Method of Implementation	Monitoring & Enforcement
TR-21 *Presidio-Wide Parking Management.* In order to reduce impacts of fee parking in Area B on parts of the Presidio outside the Trust's jurisdiction (Area A), the NPS is encouraged to implement parking regulations, time-limits and/or parking fees in potentially affected parking areas under its administration (notably, Crissy Field). The Trust shall provide assistance to the NPS to ensure coordination and consistency of parking management within both Areas A and B.	Concurrent with implementation of non-residential parking management program in Area B	NPS and Presidio Trust staff	Trust staff to coordinate with NPS regarding design of a non-residential parking management program in Area B and make recommendations regarding a complementary parking regulation program in Area A; NPS to implement parking management strategies in Area A as desired	NEPA Compliance Manager to review relevant projects for compliance
TR-22 *TDM Program Monitoring.* The Trust shall implement the TDM Program as summarized in Appendix D of the PTMP to reduce automobile usage by all tenants, occupants and visitors. The Trust shall monitor implementation and effectiveness of the TDM Program on an ongoing basis. If the TDM performance standards as described are not being reached, the Trust shall implement more aggressive TDM strategies or intensify components of the existing TDM Program, such as requiring tenant participation in more TDM Program elements, and more frequent and/or extensive shuttle service.	Ongoing	Presidio Trust TDM Coordinator and other Trust staff	Require TDM Program participation in non-residential leases; Trust-sponsored measures, monitoring and resulting program adjustments funded as feasible through annual budgets	Property management staff and consultants to oversee compliance with lease conditions; NEPA Compliance Manager to review relevant projects for compliance with measures and ongoing program elements and adjustments
TR-23 *Reduce Parking Supply.* In order for the parking supply to meet, but not exceed, demand, the existing parking supply of 11,210 spaces shall be reduced to 9,170 parking spaces as decisions are made about future building uses and landscape treatments.	During project planning	Presidio Trust planning staff	Parking spaces to be reorganized and reduced through landscape designs accompanying long term leases and project plans	NEPA Compliance Manager to review relevant projects for compliance

Presidio Trust Management Plan (PTMP) **Mitigation Monitoring and Enforcement Program**[1]				
Mitigation Measure	**Timing of Implementation**	**Responsibility for Implementation**	**Method of Implementation**	**Monitoring & Enforcement**
TR-24 *Special Event Parking Management*. The Trust, in coordination with the NPS, shall implement TDM Program measures to discourage single-occupant automobile usage, encourage alternative modes of travel, and maximize use of available parking resources. Special events that could result in overflow parking shall be coordinated to ensure that parking supply is not exceeded. Special events shall be scheduled based on parking availability, shall be regulated to ensure that supply meets expected demand including demand from Area A of the Presidio. Events requiring large amounts of parking shall not be scheduled concurrently with other events or Presidio peak parking demand periods if combined parking demand shall exceed the available supply within Area B of the Presidio. Sponsors may be required to provide special transit and bicycle services during their events to reduce expected parking demand and promote use of public transit, biking, walking, and remote parking lots.	During park-sponsored activities and special events	Presidio Trust staff in coordination with NPS	Require coordination, scheduling, and other measures as conditions of project approval	Project staff to confirm compliance with NEPA Compliance Manager
TR-25 *GGT Transit Service Monitoring*. The Trust shall monitor Golden Gate Transit (GGT) operations and passenger loads at the Presidio to identify any capacity problems, particularly on northbound GGT bus service during the p.m. peak hour. If monitoring were to reveal insufficient capacity for northbound Presidio-generated passengers during the p.m. peak hour, potential improvements with the GGBHTD shall be identified.	Periodic	Presidio Trust TDM Coordinator in coordination with GGBHTD	Trust staff to monitor loads and capacity in coordination with GGBHTD and to identify, improvements, as needed. GGBHTD to implement improvements as desired	NEPA Compliance Manager to review relevant projects for compliance when improvements are necessary
TR-26 *Construction Traffic Management Plan.* The contractor(s) of individual projects shall work with the Trust to develop a Construction Traffic Management Plan. The plan shall include information on construction phases and duration, scheduling, proposed haul routes, permit parking, staging area management, visitor safety, detour routes, and pedestrian movements on adjacent routes.	Prior to demolition and construction activities	Project staff and contractors	Require Construction Traffic Management Plan as part of project planning or as a condition of project approval	Project staff to confirm compliance with NEPA Compliance Manager

Presidio Trust Management Plan (PTMP)
Mitigation Monitoring and Enforcement Program[1]

Mitigation Measure	Timing of Implementation	Responsibility for Implementation	Method of Implementation	Monitoring & Enforcement
Water Supply and Demand				
UT-1 *Demand Management Best Management Practices.* The Trust, in cooperation with its tenants and residents, shall implement Best Management Practices (BMPs) that encourage water conservation. Given the evolutionary nature of water conservation measures, the Trust shall make provisions for the removal or addition of BMPs as the technical and economic reasonableness of measures are determined. Current BMPs are: • Continue to identify and repair leaks to reduce distribution system losses; • Install water meters and develop a consumption-based billing system to discourage inefficient use of water; • Conduct water audits and monitor tenants' meters, water heaters, and plumbing fixtures; • Install water-conserving devices as part of all building rehabilitation projects. Retrofit requirements include installation of low-flow toilet and shower fixtures and faucet aerators, and recycled water irrigation systems (in areas where recycled water is or will be available); • Implement park-wide irrigation guidelines which include specific requirements for efficient and effective water application (i.e., non-daylight hour application, use of highly-efficient irrigation systems, use of meteorological data in irrigation scheduling, etc.), and use of recycled water for irrigation wherever available; • Prohibit use of additional water for new landscaping or expansion of existing facilities unless low water use landscaping designs and plant materials are consistent with the recommendations of the VMP (which requires the use of drought tolerant plant species) and water efficient irrigation systems; • Hire or designate an in-house Water Conservation Coordinator; • Provide comprehensive water conservation outreach efforts to tenants and residents, including brochures, newsletter announcements, posters, direct mailings, and other "attention getters;" • Participate in efforts being made by other water management agencies to identify additional conservation programs; and • Install Pressure Regulating Valves (PRV) at specific buildings where water pressure warrants such action.	Ongoing	Presidio Trust Director of Operations, staff, and consultants	Include physical improvements within Trust work programs and capital plan as feasible; non-physical measures accomplished by Trust staff on an ongoing basis; make BMPs part of project planning or a condition of project approval	Project staff to confirm compliance with NEPA Compliance Manager

Presidio Trust Management Plan (PTMP)
Mitigation Monitoring and Enforcement Program[1]

Mitigation Measure	Timing of Implementation	Responsibility for Implementation	Method of Implementation	Monitoring & Enforcement
UT-2a *Water Shortage Emergency Response*. The Trust shall prepare a water shortage contingency analysis that includes the following elements: • Stages of action to be undertaken in response to water supply shortages, including up to a 50 percent reduction in water supply, and an outline of specific water supply conditions that are applicable to each stage; • An estimate of the minimum water supply available based on the driest three-year historic sequence for water supply; • Actions to be undertaken to prepare for, and implemented during, a catastrophic interruption of water supplies including, but not limited to, a regional power outage, an earthquake, or other disaster; • Additional, mandatory prohibitions against specific water-use practices during water shortages; • Appropriate consumption reduction methods in the most restrictive stages that have the ability to achieve a water use reduction consistent with up to a 50 percent reduction in water supply; • Penalties or charges for excessive use, if feasible; and • A mechanism for determining actual reductions in water use pursuant to the water shortage contingency analysis.	On or before December 31, 2005 (Similar to the Provision in California Water Code Division 6, Part 2.6, Urban Water Management Planning)	Presidio Trust Water Conservation Coordinator, other Trust staff and consultants	Undertake analysis	Water Conservation Coordinator to confirm compliance with NEPA Compliance Manager
UT-2b *CCSF Water Shortage Contingency Planning*. The Trust shall be subject to the CCSF water contingency plan and drought restrictions for all City-purchased water. During times of drought or low runoff, when the CCSF water system may be vulnerable in its ability to provide a safe reliable source of water, the Trust may be allocated a drought allotment based on an examination of domestic water usage, irrigation water usage, and water produced from the Lobos Creek Water Treatment Plant. Under CCSF emergency conditions, the Trust shall consider supplying water to the CCSF for the purpose of augmenting its total water supply if Trust water is available beyond the amounts necessary to meet Presidio service needs (based on a rationed domestic use and restricted irrigation schedule), and ensure resource protection objectives and minimum stream flows within Lobos Creek are met.	In response to CCSF water supply shortages	City and County of San Francisco Public Utilities Commission (SFPUC) in coordination with Presidio Trust Water Conservation Coordinator	Implement the drought allotment, if applicable, and maintain ongoing communication between the Trust and SF PUC	Trust Water Conservation Coordinator to confirm compliance with NEPA Compliance Manager
UT-3 *Recycled Water Use.* The Trust shall proceed with an evaluation and environmental review of an onsite phased water reclamation system (see Mitigation Measure UT-5) for use as a non-potable water source. The system shall use recycled water in the Presidio to reduce consumption of potable water for non-potable uses (i.e., irrigation), and also to lower the volume of wastewater discharged to the City's combined sewer system.	Ongoing. Phase one project expected to be in operation by 2005	Presidio Trust Director of Operations, other staff, and consultants/ contractors	Phase one plant to be constructed starting in FY03	Project staff to confirm compliance with NEPA Compliance Manager

Presidio Trust Management Plan (PTMP)
Mitigation Monitoring and Enforcement Program[1]

Mitigation Measure	Timing of Implementation	Responsibility for Implementation	Method of Implementation	Monitoring & Enforcement
Wastewater Treatment and Disposal				
UT-4 *Reduction of Onsite Wastewater Generation.* The Trust shall implement water conservation BMPs (see Mitigation Measure UT-1) to limit water usage at the Presidio and reduce wastewater generation as well. The Trust shall also rehabilitate the sewer infrastructure (slip-lining and replacing broken and cracked sections of pipe) to reduce stormwater infiltration into the wastewater system.	Ongoing	Presidio Trust Director of Operations, staff, and consultants	Include physical improvements within Trust work programs and capital plan as feasible; non-physical measures accomplished by Trust staff on an ongoing basis; make BMPs part of project planning or a condition of project approval	Project staff to confirm compliance with NEPA Compliance Manager
UT-5 *Limits on Offsite Wastewater Flows.* The Trust shall develop a reclaimed water system and treatment plant. (The plant shall have a minimum treatment capacity of 200,000 gpd and be expandable up to 500,000 gpd. At times of year when recycled water is not needed for irrigation, the Trust shall consider using the reclaimed water system to treat wastewater from the eastern side of the Presidio and discharge it on the western side of the park to the City's Oceanside Water Pollution Control Plant (OWPCP). As the sanitary sewer system serving the OWPCP has a greater capacity to absorb wet weather flows, redirecting Presidio flows to the west side will help limit overflows from the City's combined sewage system.	Ongoing. Phase one project expected to be in operation by 2005	Presidio Trust Director of Operations, other staff, and consultants/ contractors	Phase one plant to be constructed starting in FY03	Project staff to confirm compliance with NEPA Compliance Manager
Storm Drainage				
UT-6 *Stormwater Drainage System Upgrades.* The Trust shall require that necessary infrastructure upgrades to the stormwater drainage system are performed on a site-specific basis to ensure that the adequate system capacity is provided and also to correct existing operational problems.	Periodic, as warranted	Presidio Trust operations staff and contractors	Include general site improvements within Trust's work programs and capital plan as feasible; include project-related improvements in project planning or as a condition of project approval	Project staff to confirm compliance with NEPA Compliance Manager

Presidio Trust Management Plan (PTMP) **Mitigation Monitoring and Enforcement Program**[1]				
Mitigation Measure	**Timing of Implementation**	**Responsibility for Implementation**	**Method of Implementation**	**Monitoring & Enforcement**
UT-7 *Stormwater Reduction.* The Trust shall implement designs or measures to limit or eliminate impervious surfaces in order to reduce stormwater runoff volumes and improve water quality. The Trust shall practice natural stormwater reduction by using on-site vegetation and landscaping as a filtration and retention system to the extent feasible. Grass, sand, and other porous surfaces, particularly when placed around non-porous surfaces such as asphalt, could significantly limit stormwater runoff. Projects shall be reviewed to determine if stormwater flows could be limited through reduction of impervious surfaces and addition of porous surfaces.	Prior to implementing relevant projects or plans	Presidio Trust operations staff and consultants	Include general site improvements within Trust's work programs and capital plan as feasible; include project-related improvements in project planning or as a condition of project approval	Project staff to confirm compliance with NEPA Compliance Manager
Solid Waste				
UT-8 *Waste Diversion.* To the extent possible, the Trust shall implement cost-effective, environmentally protective alternatives to disposal of demolition debris to help meet the mandates of the State's 1989 waste diversion law (requiring cities and counties to divert 50 percent of their waste streams from landfills by the year 2000) including the following: • Selecting contractors who understand the processes involved and are able to maximize reuse and recycling of construction and demolition materials; • Clearing salvageable items from structures prior to demolition activities, including such items as piping, flooring, doors, windows, bathroom fixtures and kitchen fixtures, hospital equipment, heaters, and lumber; • Removing and encapsulating contamination before demolition to minimize commingling of the wastes and to maximize reuse of the uncontaminated materials; • Bringing down buildings piece by piece, as in hand demolition, to recover the maximum amount of reusable materials; • Size-reducing (especially concrete) and presorting and segregating materials after demolition to increase salvage value of the recovered materials, and to decrease tipping fees for different materials in the debris; • Recycling materials on-site to lower both hauling and disposal costs; and • Storing recovered materials within the Presidio to avoid flooding a market with too much recyclable materials at one time (which drives local prices down and reduces potential income from the sale of materials).	Prior to, during, and after demolition activities	Presidio Trust staff and consultants	Include measures in project planning or as a condition of project approval	Project staff to confirm compliance with NEPA Compliance Manager

Presidio Trust Management Plan (PTMP)
Mitigation Monitoring and Enforcement Program[1]

Mitigation Measure	Timing of Implementation	Responsibility for Implementation	Method of Implementation	Monitoring & Enforcement
Energy Consumption and Distribution				
UT-9 *Improve Existing On-Site Electrical Infrastructure.* The Trust shall address on-site infrastructure capacity through utility planning, and re-wiring or replacing existing on-site transformers to re-distribute power to high demand areas.	Periodic, as warranted	Presidio Trust Director of Operations, other Trust staff, and consultants	Physical improvements achieved through Trust's work programs and capital plan as feasible	Project staff to confirm compliance with NEPA Compliance Manager
UT-10 *Upgrade Off-site Electrical Facilities.* If required, the Trust shall work with PG&E to identify the necessary upgrades to off-site feeders.	Periodic, as warranted	PG&E and Trust staff	Trust staff to monitor connectivity and supply, to identify deficiencies and necessary upgrades, and coordinate with PG&E as needed; PG&E to implement improvements as desired	NEPA Compliance Manager to review relevant projects for compliance
UT-11 *Energy Conservation Practices*. The Trust shall employ the following practices to meet the goals of Executive Order 13123 and minimize the environmental impacts of energy consumption throughout the built environment at the Presidio: • Meet or surpass the energy conservation requirements of California Title 24 energy code during building rehabilitation where these requirements do not conflict with historic preservation objectives; • Implement cost-effective energy conservation retrofits of buildings and utility infrastructure where these retrofits do not conflict with historical preservation objectives; • Develop and implement energy education programs for staff, tenants and park visitors; • Incorporate the site's environmental conditions in new construction to maximize solar energy and utilize natural light; • Develop energy conservation and efficient energy generation demonstration projects; • Purchase a portion of Presidio's electric needs from renewable energy sources; and • Implement energy efficient appliance and computer purchasing programs.	Ongoing	Presidio Trust staff and consultants	Incorporate energy conservation measures into project planning or require as condition of project approval; education and demonstration projects implemented through Trust's work programs and capital plan as feasible; purchasing accomplished in the course of routine procurement activities	Project staff to confirm compliance with NEPA Compliance Manager

ATTACHMENT 2

REPORT ACCOMPANYING THE ROD

ATTACHMENT 2
REPORT ACCOMPANYING THE ROD

In July 2001, the Trust released for public comment the *Draft Presidio Trust Implementation Plan and Draft Environmental Impact Statement* (Draft Plan and Draft EIS). Based upon public comments received, the Trust made changes to the Draft Plan and corresponding modifications to the Draft EIS, and in May 2002 released the *Final Environmental Impact Statement* (Final EIS) and proposed *Final Presidio Trust Management Plan, Land Use Policies for Area B of the Presidio of San Francisco* (PTMP or Final Plan). The Trust carefully considered, evaluated, and responded to all comments received on the Draft EIS, and those responses are found in the second (Volume II: Response to Comments) of three volumes of the Final EIS. This Report Accompanying the ROD considers and addresses further comments received by the Trust during the "no-action" period between public release of the Final Plan and Final EIS and the Board of Director's decision adopting the PTMP.

I. EXTENDED NO-ACTION PERIOD FOR THE FINAL EIS

The Trust released the Final EIS together with the proposed Final Plan document at a public meeting of the Trust's Board of Directors on May 21, 2002. The Trust held a second public Board meeting on June 13, 2002, to answer questions about the Final Plan and EIS. At the public meetings, the Trust announced its intention to make a final selection decision at the next regularly scheduled Board meeting on July 11, 2002. The U.S. Environmental Protection Agency (EPA) published a Notice of Availability of the PTMP Final EIS on May 24, 2002 (67 FR 36592), starting the 30-day "no-action" period (i.e., until June 24, 2002) required by the National Environmental Policy Act (NEPA) regulations. See 40 C.F.R. § 1506.10(b)(2).

A number of reviewers (the San Francisco Board of Supervisors and five other organizations and individuals) each sought additional time to review the information in the Final EIS and requested that the Trust extend the no-action period beyond July 11, 2002, the date the public expected final action.[1] The Trust deferred action at the July 11th Board meeting. The deferral provided more than three months of public review, well in excess of NEPA's 30-day minimum requirement and the 90 days requested by some reviewers. The Board finalized its decision by voting to adopt this ROD, which decision was made effective by the signature of the Trust's acting Executive Director.

II. COMMENTS RECEIVED AFTER RELEASE OF THE FINAL EIS

The Trust received a variety of public input during the no-action period for the Final EIS. Trust staff prepared this report to summarize the nature of the input received; and to respond to or clarify any new issues raised. Many of the comment letters on the Final Plan are generally favorable and express support for the Final Plan and the changes the Trust made between the Draft and Final Plan. To the extent letters and comments raise concerns, many of the same points were suggested in comments on the Draft Plan and EIS, and the Trust has already responded in Volume II of the Final EIS. Although several letters ask the Trust to consider modifications to the Final Plan, these comments raise no new issues requiring modification of the proposed Final Plan or the Final EIS.

During the 3-month no-action period, the Trust received 35 written comment letters and emails from 4 government agencies, 19 organizations, and 12 individuals. About half of the written comments — from a range of reviewers including government agencies, neighborhood groups, cultural preservation organizations, housing advocates, individuals, and the GGNRA Advisory Commission — supported or expressed overall favorable views of the proposed Final Plan. Of those written comments expressing general support for the Final Plan, almost half also asked the Trust to consider reinforcing certain aspects of the proposed Final Plan or to consider additional modifications to the Plan that would, in the commenter's view, strengthen its framework. Other reviewers remained generally neutral or silent on the

[1] The following five organizations and individuals submitted written requests for additional time to review the Final EIS: Natural Resources Defense Council, Sierra Club, Pacific Heights Residents Association, Mr. Donald Green, the San Francisco Board of Supervisors, and the San Francisco Bay Conservation and Development Commission.

proposed Final Plan but made general comments about the direction of the Presidio or the Trust, while a few expressed overall negative views or stated their preference for the Trust to select an altogether different plan.

In addition, the Trust received oral comments from 55 speakers at the June 13, 2002 public Board meeting on the Final Plan. Nine of these speakers or their organization also submitted a written comment letter generally reflecting the oral comments. Further support for the planning process and the Trust was expressed by commenters at the May 21, 2002 public meeting where the Trust presented the proposed Final Plan. Representative comments in support of the Final Plan, both statements submitted in writing and verbal statements, are excerpted below. Of the 55 commenters at the June 13th meeting, just under half (26) expressed general support for the plan, seven were negative or not in support of the Plan and 22 offered more neutral statements that could not be construed as positive or negative of the Plan overall. Most of the topics and issues raised by these reviewers have been previously raised in comments on the Draft Plan and EIS, and many were responded to orally at the public meeting.

A. REPRESENTATIVE COMMENTS IN SUPPORT OF THE FINAL PLAN

- "The GGNRA Advisory Commission … commends the Trust for the plan's overall comprehensiveness, quality, and responsiveness to public comments on PTIP. The plan properly addresses the serious challenges the Trust faces in its primary mission of caring for and enhancing the Presidio's natural, cultural, scenic and recreational resources, and meeting its congressional mandate to be self-sufficient by 2013. We are pleased that the PTMP adopted many of our Commission's recommendations. " (Golden Gate National Recreation Area Advisory Commission; letter dated July 2, 2002)

- "Following the National Park Service's review of the Final Presidio Trust Management Plan (PTMP) and the Final Environmental Impact Statement (FEIS), we find there is much to be pleased with in the new plan. We understand the Trust's financial reality, and it is a meaningful consideration. Balance is key and this plan appears, overall, to come closer to a balance wherein income generation is not for any end of its own, but for purposes of preserving the Presidio as part of a national park — a place for the enjoyment of this and future generations. … We have reason to be optimistic about this plan, and believe it provides a good basis to move forward. We are pleased to note that it has incorporated many positive changes that respond to the major concerns voiced in our comments on the draft PTIP." (National Park Service; letter dated July 11, 2002)

- "In our review of the [Final EIS], EPA found that the document adequately addresses the issues we raised. Modifications to the [Draft EIS] are clearly identified, and changes to the project based on prior feedback from EPA, other agencies, and the public are thoroughly discussed. The revised project reduces the impacts to the environment, and is responsive to the public's concerns regarding protection of the natural, cultural and historic resources within the Presidio. The Final Plan provides a good balance among the competing visions for Area B of the Presidio." (The U.S. Environmental Protection Agency; letter dated June 24, 2002)

- "[The National Parks Conservation Association] would like to recognize the notable positive strides … reflected in the PTMP. The Plan's tone expresses a stronger commitment to the preservation of the historic, cultural and natural resources that make the Presidio such a spectacular place. In your commitment to preserve the Presidio National Historic Landmark District (NHLD) status, in your prioritization of activities that will restore Tennessee Hollow, and in taking steps toward enhancing Crissy marsh, we commend you. NPCA is further appreciative of the increased specificity through greater detailing of the amount of potential new building space and, in cases, building uses in various districts of the park. … We are pleased to find that the PTMP contains a lower level of funding for programming. The stated intent to encourage tenant contributions and work with the National Park Service…is another positive step. (National Parks Conservation Association; letter dated August 15, 2002)

- "The Cow Hollow Association represents the interests of approximately 1,100 residential units in the area bounded by Lyon, Pierce, Greenwich and Pacific [Streets]. We appreciate the great effort put forth in your recently released 'Presidio Trust Management Plan' and 'Final Impact Statement.' We feel that both the tone of the changes made in

response to public comment as well as the amount of detail provided make for a much more understandable and acceptable plan." (Cow Hollow Association; letter dated July 9, 2002)

- "The Planning Association for the Richmond (PAR) would like to express our general approval of a number of the changes reflected in the revised Presidio Trust Management Plan (PTMP) issued in May 2002. We would also like to extend our appreciation for the Trust's consideration of the public's input during the preparation of the PTMP." (Planning Association for the Richmond, letter dated July 3, 2002)

- "As the Presidio Trust nears the end of a two-year planning effort, I would like to commend you and your staff for being open and responsive to National Trust [for Historic Preservation] concerns regarding protection and reuse of the Presidio's historic resources. …. As we had hoped, the PTMP clarifies and expands key themes introduced in the draft plan, expressing a stronger commitment to adaptive reuse of historic buildings, delineating a full range of alternatives to be considered before demolition, and providing a meaningful role for the public in decisions that could adversely impact historic resources. We are especially pleased by the assurance that the Presidio Trust will preserve the character and integrity of the NHL District. …. We further applaud the Presidio Trust for its willingness to work with others in the joint review of projects under the National Historic Preservation Act and National Environmental Policy Act." (National Trust for Historic Preservation; letter dated July 1, 2002)

- "On behalf of the California Preservation Foundation, I am writing in strong support of the new direction proposed in the [Presidio Trust Management Plan] relative to historic preservation, in particular: the priority given to the National Historic Landmark District's preservation and the emphasis on the National Historic Landmark District as the primary determiner of historic resources at the Presidio[; and t]he commitment to preservation and reuse of the historic resources at the Presidio, as well as more emphasis given to consideration of the reuse of existing structures over demolition and new construction." (California Preservation Foundation; letter dated August 19, 2002)

- "The California Heritage Council wishes to thank the Presidio Trust Board for its final version of the Presidio Trust Management Plan. It reflects a long and fair process of community deliberation. Congratulations on the effort and vision. We appreciate that it cannot be easy to simultaneously manage the Presidio both as a park and as a real estate enterprise. …. While we concur with the majority of the Plan, …vigilance on everyone's part will be a continuing requirement." (California Heritage Council; letter dated June 13, 2002)

- "I would like to take this opportunity to thank the planning staff for their fine effort to take into account our comments to the previous Presidio Trust Implementation Plan (PTIP) and the Draft Environmental Impact Statement (DEIS). We believe our questions and concerns about an open and public review process, the programmatic agreement, historic resource protections, and planning [have] been noted." (San Francisco Architectural Heritage; letter dated June 13, 2002)

- "San Francisco Beautiful (SFB), a nonprofit membership organization founded in 1947 … [has] reviewed the Final PTMP and SFB is pleased with many of the changes the Trust made to the plan. We applaud the enhanced commitment to preservation of resources, sustainability and public input; the increased emphasis on avoiding adverse impacts on the Presidio's integrity as a National Landmark Historic District; the cap of 1654 housing units; the housing at the Public Health Service Hospital; and the siting of replacement housing at north Fort Scott and west Letterman. We note the PTMP's greater specificity for sites and structures for public lodging. …we agree with greater reliance on tenants and other organizations to provide public programs, as well as to the reduction in Trust funding for programming. SFB is pleased with the moratorium on development around the tidal marsh at Crissy Field and the Trust's commitment to study the expansion of the tidal marsh …. The Trust has shown great responsibility by continuing to insure that adequate funds are available for capital improvements. The final PTMP is responsive to recommendations from SFB for all of the aforementioned items. Thank you for embracing these important concepts." (San Francisco Beautiful; letter dated June 13, 2002)

- "I believe that the revised plan is an excellent framework for balancing the demands of preservation of the natural and built resources and the fiscal demands of operating the park. The revised plan and the outcome of the public

process have addressed many of the public concerns raised about the General Management Plan. The revised square footage allocation of approximately 1/3 for public uses, 1/3 for housing and 1/3 for offices is a commendable distribution to promote the balance originally envisioned for a sustainable community within a National Park." (Leddy Maytum Stacy, Architects; letter dated June 12, 2002)

- "We strongly support the efforts of the Presidio Trust to make the Presidio a self-sufficient, multi-use park. Our most important concern is to ensure that the Presidio does not lose any housing in its projected plan. While environmental and congestion concerns should not be underestimated, housing remains the most important issue facing San Francisco and the Bay Area. As the Presidio creates new jobs, it is important that housing units are provided so as not to worsen our existing housing crisis. …. We commend the Trust for its excellent work thus far and support your innovative efforts to maximize the uses of the park." (The San Francisco Housing Action Coalition; letter dated June 3, 2002)

- "The plan has been strengthened as the Trust listened carefully and selected the strongest suggestions from the cacophony of voices and visions which bombarded it. The Trust has been a responsive public body." (Michael Alexander; letter dated July 8, 2002)

- "I am writing to express my strong support for the Presidio Trust Management Plan. …. We are all working to preserve, not just open space and a park in the usual sense, but a part of our physical history — a developed site that has played a unique role in the history of the West and of San Francisco. I strongly support the vision contained in the Management Plan. It is the next logical step in the process that was started with the 1994 General Management Plan." (Jim Lazarus; letter dated June 27, 2002)

- "I think we have to accept as citizens that this is an unparalleled opportunity with absolutely no model in the world to follow. …I want to urge San Franciscans to get going — move ahead with it and support those leading the way in this fantastic opportunity. I want to point out that many of us here speaking will probably not be around in 30 years when it's finished. And the San Francisco for those generations is what we are creating, not to take care of those of us who are here now." (Architect and San Francisco Resident, John Field; oral comment at June 13, 2002 public hearing)

- "I've been following the process for probably as many years as most in this room, and I'd like to join those who are throwing bouquets at the staff of the Trust. I think after 18 years, as I counted, of unrealistic approaches to the problem, the present preferred alternative is the most doable and, I think, satisfactory possible compromise between many alternatives." (Whitney Hall; oral comment at June 13, 2002 public hearing)

- "So I wanted to acknowledge the fact that you have made our lives a little bit better in the natural world because of your increased commitment to[the Tennessee Hollow] watershed and to the Crissy Marsh study. Thank you very much — that was really much needed and appreciated. (Member of the GGNPA and Presidio Volunteer, Jan Blum; oral comment at June 13, 2002 public hearing)

- "After reading through the plan and the EIS I want to compliment the Trust, the Board and the staff on listening to us, on responding and on making some important changes. I think the plan is better.. You've obviously listened. It's a good process and we appreciate that. You're also committing to two of the three major restoration opportunities….[a]nd I applaud you for doing that and sticking with that commitment." (San Francisco Resident and Presidio Volunteer, John Helding; oral comment at June 13, 2002 public hearing)

- "…in a public planning process people are more likely to express their disagreement with you than their support. …So tonight instead of watching the Stanley Cup Finals, I came to tell you that I support the plan that you've put together. I think you've done a masterful job at balancing … conflicting needs and have done that while being very sensitive to the public comment that you have received." (Planner and Environmental Consultant, Mara Feeney; oral comment at June 13, 2002 public hearing)

- "I spent three hours, a delightful three hours, this afternoon at the Crissy Café reviewing the two documents, the comments and responses and the Management Plan. And I am impressed." (Mary Anne Miller for San Francisco Tomorrow; oral comment at June 13, 2002 public hearing)

- "I'm here to really support the document that's been presented. It was very clear from Congress what our challenge was in front of us. And I think over the past couple of years that we've been able to pull together and create a solid document. I think the document has gone way further than simply coming up with a way to achieve self-sufficiency…in presenting so many opportunities to really bring people into the park and create perhaps a best use maximization for the utilization of this space." (San Francisco Resident and "frequent user of our park," Anson Snyder; oral comment at June 13, 2002 public hearing)

B. REQUESTS FOR FURTHER MODIFICATIONS TO THE FINAL PLAN

A great national park – Incorporate language in PTMP that the Presidio will be kept as a great national park.

Response: The Trust wholeheartedly agrees with the sentiment of the suggested change, and the PTMP affirms the Trust's commitment to make the cornerstone of the Trust's vision the character of the Presidio and the preservation, protection, and enhancement of its cultural and natural resources. As the policy concept is implicit in the Plan vision, the Trust is declining to expressly amend the language of the Plan. Nevertheless, statements regarding the preservation of the Presidio as a great national park have been incorporated into the ROD.

Additional Future Increase in Open Space – Include a long range goal to "make the Presidio a demonstration and education site for how open space with high biologic values can be conserved and maintained in urban areas." Add language to the Final Plan that leaves the opportunity open for a future Board, as financial conditions permit, to remove additional structures that are now non-historic to create further unfragmented open space without having to first amend the PTMP.

Response: The Trust carefully considered the proposal to expressly add the suggested language to the Plan, but is declining to add the suggested text because, as above, the concept is implicit in the more specific policies and guidelines of the Plan itself. Language has been added to the ROD to affirm the concept of making the Presidio a demonstration and education site (Section II) and to explain why the PTMP's balance between cultural and natural resource protection should not be drawn differently at this time. See ROD Section IV.A.11.

Modify the Vision – Modify the language of the vision statement to delete the language concerning "a purpose beyond itself" and substitute alternate language.

Response: Reviewers apparently interpreted the text about the Presidio not having a "purpose beyond itself" as preclusive. It is not. The PTMP vision does not preclude a higher purpose for the Presidio; the sentence suggested for deletion simply indicates that the Trust does not wish to require that the Presidio achieve a higher purpose, such as addressing the world's most critical problems. This issue is more fully explained below (Section B. "Vision"). The Trust agrees with the concepts suggested in the substitute language. All of these concepts are embodied elsewhere within the text and policies of the Plan, and are included within the ROD.

Planning District Guidelines – Commit to planning and design guidelines for each Planning District to ensure that new construction and landscape rehabilitation will not have an adverse or cumulative effect on the NHLD status.

Response: The PTMP already satisfies the reviewer's suggestion. The Trust is committed to the preservation and protection of the NHLD as stated clearly throughout the PTMP. The Planning Principles in Chapter 2 and Planning District Guidelines in Chapter 3 of the PTMP are derived from the relevant Secretary of Interior's Standards and will set the framework for the design of any new construction. Furthermore, the PTMP commits to public involvement and further environmental review of new construction projects, and these projects will be reviewed by the parties to the

Programmatic Agreement under Stipulation X. procedures. These protections taken together will assure that new construction will not impair the NHLD status.

Extended Moratorium – Extend the moratorium for new construction and long-term leasing at Crissy Field (Area B) "until a decision is reached" for the Crissy Marsh expansion.

Response: The Trust recognizes that the two-year duration is an estimate. Nevertheless, the Trust must bear in mind the reality of its financial deadline, and is therefore not amenable to restating the Plan as an open ended leasing moratorium commitment. The Crissy Marsh study called for in the PTMP will provide the basis for a preferred plan, and may provide the rationale for extending the moratorium in the future.

Specify all future plans – Identify subsequent area, sub-area and topical planning efforts.

Response: The Trust cannot know with specificity each and all of the future planning efforts it will undertake or their precise scope, as explained in response to comments on the Draft Plan and EIS (Final EIS Volume II, Response to Comment PI-9 (pages 4-51 through 4-52)). A discussion of both short-term and long-term planning and implementation actions and strategies is contained in PTMP Chapter 4, pages 122 through 127.

Tenant selection criteria and process – Refine and allow public review of the tenant selection criteria. Commit to an NPS role in tenant selection decisions.

Response: The tenant selection criteria are set out in the Plan and have been fully reviewed and commented upon in this public process. The criteria reflect a wide range of interests, both financial and programmatic, and will allow the Trust to select a diverse mix of tenants. Area B of the Presidio is within the Presidio Trust's jurisdiction, and NPS does not have a role in tenant decisions, just as the Presidio Trust does not have a role in tenant decisions elsewhere in the GGNRA under NPS's jurisdiction.

Reaffirm opportunities for public review – Reaffirm that the PTMP is a long-term policy document rather than an implementation plan and that public review will be provided before future actions are taken in each Planning District. Modify the public involvement chart to provide for more public meetings.

Response: The Trust received many comments on the Draft Plan expressing concerns about the public's role in future implementation decisions about the Presidio. In response, the Trust provided much greater specificity about the public's role and made a clear commitment in the Final Plan to provide the public with meaningful opportunities for public review and input for important Trust decisions. This commitment is clearly expressed in PTMP Chapter 4, pages 126 through 131 and is reiterated in Section VII of the ROD setting forth the Trust's decision. Section VII of the ROD also makes clear that the PTMP is a long-term policy document and land use framework rather than a specific implementation plan. PTMP Figure 4.3 indicates that there will be many opportunities for meaningful public input — often including formal public meetings, review, and comment — before important Plan implementation decisions are made. As indicated there; in EIS Volume II, Response to Comment PI-2 (pages 4-46 to 4-47); and in the ROD Section VII, the actual process of involving the public will vary depending upon the potential environmental effects of the proposal.

Decrease overall built space – Lower the total allowable square footage by compromising between the Final Plan Variant and the Final Plan.

Response: As described in the ROD, the Trust believes the Plan strikes the appropriate balance between resource protection and financial security and open space and developed space, and is therefore declining to further reduce the built environment in the Presidio beyond what is called for in the PTMP.

Preclude new housing construction – Delete the aspect of the Final Plan that permits consideration of new construction to provide housing units.

Response: The Trust addresses in the ROD the basis for rejecting this suggested change to the PTMP. See ROD Section IV.A.6. and the discussion of the Final Plan Variant under ROD Section IV.B. Housing units, the most stable and reliable source of revenue for the park, are being removed to achieve other resource goals under the Plan. Relying solely upon subdivision and conversion of existing space to replace lost units may become economically infeasible and may jeopardize the protection and integrity of individual historic structures. The Trust therefore considers the option for new construction of housing units to replace those removed to meet other goals or to provide sufficient units to meet demand to be a prudent option. The Plan places sufficient constraints on new construction to ensure the protection of the Presidio's NHLD status and the integrity of its other resources (e.g., natural, visual, aesthetic).

Public Health Service Hospital – Modify the square footage limits of the PHSH Planning District to reflect the possibility that the hospital's wings could be removed and not replaced.

Response: The square footage limits of the Final Plan need not be modified to permit consideration of the reviewer's suggestion — removal of the hospital's wings without replacement. The maximum demolition allowance of 130,000 square feet (sf) would accommodate removal of the non-historic wings. The planning concept for the District allows replacement of built space that is removed, but does not require it. Note that the maximum building area allowance in the District is "up to" 400,000 sf, the amount that currently exists, but "up to" implies that the total may not be reached.

C. COMMENTS RELATED TO TOPICS/ISSUES ADDRESSED IN THE PLANNING PROCESS

Some comments raised by those who reviewed the Final Plan address issues that will become relevant only during the future implementation of the Plan and may not therefore be specifically addressed below. These commenters points of view will be retained and considered as the Trust moves forward with implementation of the Plan. The majority of issues raised are summarized with references to relevant sections of the Plan and EIS.

Vision

Two reviewers scrutinized the Final Plan's vision statement, saying it "falls short" and criticizing it as "myopic." A reviewer claims the vision lacks an "unambiguous statement of what the Trust intends to create at the Presidio" and claims the Plan lacks "justification for abandoning the GMPA vision."

Response: The Final Plan vision and an explanation of how and why it differs from the GMPA vision is at pages iv-v of the PTMP and Final EIS Volume II, pages 4-55 to 4-61 (particularly Responses to Comments VI-1 and VI-6). See also Final EIS Volume II, pages 4-319 to 4-321, particularly Responses to Comments TS-1 and TS-2 concerning mission-related tenants. Also see ROD Section IV.A.1.

Perhaps no topic has raised greater passion during the 12 years of Presidio planning than the debate over what is the desired "purpose" for the Presidio. Those who object to the Final Plan's vision believe the nature and mission of the tenants who fill the Presidio's buildings should define its purpose, and would like the Trust to define a vision centered around a collective mission for Presidio tenants. Under this view, the Trust should select tenants whose collective mission would create a "global center" for solving important world problems; this would be the higher purpose of the Presidio and "what the Presidio would become." This higher purpose would presumably absolve the "taint" these reviewers believe financial considerations or the marketplace would place on the future implementation of the Plan (One reviewer states: "If the market determines the purpose, [the Presidio] is a marketplace.") As much as some want the "global center" vision to define the Presidio, the Trust need not adopt it; Congress did not make this higher purpose part of the Trust's charge, and the Trust is not adopting the GMPA vision because it could so constrain tenant selection that it would put in jeopardy the success of the financial requirements set by Congress.

The Trust is not suggesting that leasing to GMPA-type tenants is unwanted, simply that to focus leasing on a single policy principle would make the Trust's financial challenge that much more difficult. There is no compelling reason to further burden what is already a formidable financial challenge. The price of failure is high, and the Trust is not willing

to allow a policy goal — one that was neither mandated nor embraced by Congress — to take precedence over the Trust's central mission of preserving the Presidio as a great national park site.

Tenant Selection

A few reviewers criticize the Final Plan for including no plan or procedures for outreach to GMPA-type tenants or other measures to facilitate their ability to occupy Presidio space. Another reviewer reasserts, without support, that the Trust can over time find the overlap between market rent and mission-enhancing tenants and could, if it tried, fulfill the GMPA vision of leasing all remaining space to mission-serving tenants. Another reviewer asserts that the ability to contribute to the rehabilitation of the Presidio's historic buildings should not be a relevant factor in selecting tenants.

Response: The Trust Act tenant selection criteria in § 104(n) is directly contrary to the reviewer who claims that ability to contribute to rehabilitation of the Presidio's historic structures is irrelevant in tenant selection. Marketing Presidio buildings presents challenges not attendant to other locations in San Francisco. The Trust does not agree that seeking such tenants assures that they will lease Presidio space. A full discussion of tenant selection and tenant diversity is at PTMP pages 133-135. It may be helpful to read these points in the context of the discussion concerning Financing the Park at PTMP pages 114-122. A complete response to comments concerning tenant selection is in Final EIS Volume II, pages 4-319 to 4-327. Also see ROD Section IV.A.7.

Biology

Reviewers express views at both extremes of the biological resources debate. One reviewer says "restoration of natural resources" is the single greatest threat to the Presidio and its historic past. Another says the Trust should not add open space at the expense of removing Wherry Housing, which is an important revenue source. Other reviewers say that the Trust should emphasize habitat restoration and expansion and make a clear commitment to ecological restoration.

Response: These views reflect the range of opinion received in response to the Draft Plan and EIS. The Trust's Final Plan reflects its obligations under the Endangered Species Act not to jeopardize the survival of listed species (see ROD Section VI.B.3), and the decision to remove Wherry Housing over time is its commitment to that obligation. A future planning effort will look at the different opportunities and constraints involved in the restoration of Tennessee Hollow, and that planning effort will further define the details of the commitment to restore Tennessee Hollow. Different reviewers would strike a different balance between the protection of cultural versus natural resources at the Presidio; nevertheless, the Trust has considered all views and believes the Final Plan strikes the correct balance between the preservation, protection and enhancement of natural and historic resources. See ROD Section IV.A.11.

Crissy Marsh

Reviewers opinions are similarly split concerning the future of Crissy Marsh. One reviewer is concerned that the Plan does not commit to use Area B land or to demolish the Commissary for expansion of the marsh if that is the best solution. To fail to commit to expansion would be to squander monies already spent. Another reviewer on the other side of the issue calls for retrenchment on the marsh expansion ("The Crissy Field Marsh expansion should likewise be restudied carefully…. that project has <u>not</u> been a success. … and there is no reason to enlarge it now at the expense of other uses.")

Response: The PTMP commits to the long-term health of Crissy Marsh, but does so while also acknowledging that the means to achieve the policy goal requires consideration of tradeoffs and a wide range of implementation options that were beyond the scope of PTMP. The Crissy Marsh Expansion Technical Study committed to in PTMP will identify a broad set of potential actions within Area B as one reviewer urges, and will provide sufficient technical information to inform subsequent decision-making as the opposing reviewer urges. The Trust recognizes the strong opinions on both sides of the issue and has chosen to use the mechanism of a collaborative technical study to identify and assess the benefits and impacts of different options using a more complete array of relevant decision-making criteria than have been previously available. These study criteria are summarized and further response to the issue of Crissy Marsh

expansion is in EIS Volume II, Response to Comment BR-3 (page 4-143). The Plan's commitments concerning the marsh are set out in Chapter 1, Planning Principle 8 (page 20).

The Plan's reference to reuse of the Commissary as museum space reflects the reality of the current situation wherein Congress has requested that the Trust and NPS collaborate to study the feasibility of establishing a Pacific Coast Immigration Museum at the Commissary or at another site. The study is underway but in its preliminary stages. Furthermore, the location of the Commissary is prominent and accessible and the building itself is in fairly good condition making consideration of its reuse sustainable. See EIS Volume I, Response to Comment PR-18 (pages 4-215 to 4-216) and NC-3 (page 4-165 to 4-166).

Historic Resources

Several reviewers ask the Trust to reaffirm the commitment to protection of the NHLD. One is concerned about how the feasibility of individual rehabilitation and reuse projects will be determined. Another is concerned that budget cuts in cultural programs will have an adverse effect on monies available for preservation of historic structures. Still another asked for a comprehensive maintenance plan to stabilize historic structures and protect them from further deterioration.

Response: PTMP articulates a firm commitment to protect the historic character and integrity of the NHLD. PTMP page 5. The same commitment is carried forward into the ROD (Section II and Section IV.A.1.).

With regard to determining feasibility of rehabilitation of historic structures, no prescriptive approach can be developed that would apply to all circumstances. Instead, these determinations will be based upon the specific factual circumstances, such as the building's condition, the cost to rehabilitate it, the ability to reuse the building, and the economics of doing so.

The reviewer concerned about cuts in the Trust's program budget is confusing budget dollars targeted at public programs such as exhibits and public events with capital dollars needed to rehabilitate historic buildings consistently with the Secretary of Interior's Standards. In Fiscal Year 2001, the level of expenditure for park programs was at a baseline of approximately $2 million. The Trust hopes to increase this amount over time to $5 million. The Final Plan sets a goal of allocating $5 million annually in Trust revenues, supplemented by outside sources (including philanthropy), to support Presidio programs in the future. This goal is expected to be achieved over time, and at the start the Trust will sustain only a baseline level of funding for park programs, while it places higher priority on funding protection and preservation of park resources, including making the necessary capital investments in rehabilitation of historic structures to prevent further deterioration and to preserve them.

Finally, with regard to stabilizing historic structures, the Trust plans to begin an ongoing cyclical maintenance program to stabilize and protect historic structures from unchecked deterioration that could impede reuse potential.

Housing

As with other issues, reviewers have opinions at different ends of the spectrum on a variety of housing issues. Some reviewers continue to call for no new construction of housing units to replace units removed to achieve the Plan's resource protection goals. Other reviewers urge the Trust to maintain housing supply within the park at its current level. Similarly, with regard to removal of Wherry Housing, reviewers again diverge, some calling for its removal as the best option for enhancing endangered species habitat while others urge the Trust not to remove Wherry or to keep it as long as possible because it is costly to remove, expensive to replace, and provides substantial revenue.

Response: Reviewers suggestions tend to be at the extremes (we do not feel that the use of an arbitrary ratio of 'jobs/housing balance' or a policy of 'no net housing loss' has any place in a National Park."). Again, as with other issues, the Trust believes the PTMP strikes the best balance among the differing opinions and competing interests on housing issues. The reasons for selecting the housing policies and parameters of the Plan are set forth in the ROD at Section IV.A.6. Much more detailed response to these housing issues, all of which were raised previously in comments

on the Draft Plan and EIS, are set forth in the Housing responses in EIS Volume II at pages 4-173 through 4-196. A full discussion of jobs/housing balance and no net loss of housing in Response to Comment HO-1 (pages 4-173 to 4-175). Responses concerning construction of new housing units are specifically addressed in Responses HO-7 through HO-10 (pages 4-181 to 4-187) with additional discussion in Response to Comment NC-1 (pages 4-163 to 4-165) and NC-4 (page 4-166). Responses concerning the removal of Wherry Housing are set forth in detail at Responses HO-11 and HO-12 (pages 4-187 to 4-190).

New Construction

Reviewers continue to express opinions about the effect of potential new construction on the NHLD. Some reviewers disfavor any potential for new replacement construction on the basis that new construction is not necessary for financial viability.

Response: Reviewers continuing concerns are unfounded as the Final Plan and now the ROD make a firm commitment to protection of the NHLD. The Plan establishes quantitative, qualitative, and procedural constraints to ensure that any new construction proposed in the future is undertaken in a manner that is consistent with the NHLD and protective of the resources and qualities that make the Presidio a special place. For further response to reviewers concerns, see in particular EIS Volume II, Section 4.17 Responses to Comments on New Construction and in particular, Responses NC-1 (pages 4-163 to 4-165) and NC-7 (pages 4-167 to 4-169). See also ROD at Section IV.A.2.

Lodging

One reviewer is stridently opposed to lodging within the park, claiming that the tradeoffs have not been addressed.

Response: The Final EIS fully identifies and analyzes the potential environmental effects of providing lodging within the mix of uses for the Presidio. The Trust has fully considered these potential effects and with mitigation, the land use mix under the PTMP, including limited lodging opportunities, will not result in significant environmental effects. As a policy matter, the Trust disagrees with the reviewers point of view, and for the reasons set forth in Response to Comment LO-2 (page 4-198) and in the ROD at Section IV.A.8, the Trust has chosen to include lodging within the potential mix of uses under the PTMP.

Alternatives

The Pacific Heights Residents Association again expressed a desire for the Trust to select the GMPA 2000 Alternative on the grounds that it achieves self-sufficiency without giving up the vision of the Presidio becoming a global center for addressing critical world problems. It also stated a preference for the Final Plan Variant because more demolition is considered cost effective and minimizing new construction would in its view minimize the circumstances in which the Trust would have to accept ground rent instead of building rent. Cow Hollow Neighbors Association prefers the Final Plan Variant instead of the PTMP because in its view new construction is not necessary for financial viability.

Response: As set forth in the ROD, the Trust has chosen not to select the GMPA 2000 Alternative on the basis of many factors other than financial reasons alone. Although some reviewers would prefer that the Trust adopt the alternatives that embrace the GMPA vision, the Trust has chosen not to so constrain the Plan or its future leasing opportunities. The ROD sets forth the rationale for not adopting the GMPA 2000 Alternative (ROD Section IV.B.) or the vision of the 1994 GMPA (ROD Section IV.A). Additional discussion of this rationale is set out above in this attachment (Section II. B.) under the discussion "Vision." Similarly, the Trust believes the reviewer's rationale for favoring the Variant — because it precludes new construction and limits ground leasing — is misguided. The Trust discusses these factors in the ROD as among the bases for selecting the Final Plan Alternative over others.

PTMP Financial Planning Model – The Sierra Club and the City and County of San Francisco urge the Trust to "have an independent examination and verification" of the PTMP financial planning model used in the EIS to compare planning alternatives.

Response: In an October 2001 GAO Report entitled "Significant Progress Made in Preserving the Presidio and Attaining Financial Self-Sufficiency," GAO recommended that the Trust attest the PTMP financial model according to the standards of the American Institute of Certified Public Accountants Statements on Standards for Attestation Engagements." Two reviewers called for the same action. As has been repeatedly noted in the EIS, the financial model used in PTMP is not used by the Trust as an accounting model or budget projection. It relied on a set of reasonable but often simplified assumptions so as to make a meaningful comparison of hypothetical 30-year planning alternatives, but was not designed or meant to be relied upon by the Trust or outside parties as the basis to track the Trust's financial status or to measure future progress against self-sufficiency. The Trust therefore initially declined public reviewers' suggestion for an accounting standards audit. At the same time, the Trust in discussions with GAO as to how best to satisfy its recommendation, agreed to open its financial accounting information to the National Academy of Public Administration, which will conduct a review of the Trust.

Financial

The Sierra Club continues to be critical of the PTMP financial planning model, and has raised a number of specific objections concerning modeling assumptions.

Response: The points noted in the Club's correspondence have been raised previously in comments on the financial analysis in the Draft EIS and responded to in the Response to Comments (Volume II) of the Final EIS. Each specific objection is responded to again below.

1. Difference between the Financial Planning Model and the FY03 Budget.

As the planning process progressed, the Trust incorporated a number of factual updates to the financial modeling assumptions to reflect the best available information. The Sierra Club seeks further changes now to the modeling assumptions. Every planning process has its end, and updating the model continually is neither possible nor necessary, particularly given its limited purpose. Moreover, any further update, in this instance is unwarranted. A final FY03 budget has not yet been submitted to Congress or adopted by the Trust.

The financial analysis provided in the Final EIS is an assumption-driven analysis, intended to test the relative strength of a variety of land use alternatives over a 20-30 year period utilizing mostly common but simplified planning assumptions. The analysis is not intended as a projection or plan for how the Trust will allocate budgets in the future, and the costs and revenues shown within the analysis for each year will almost certainly deviate from the Trust's adopted budget in FY03 and in subsequent years. For more discussion on the financial planning analysis, its purposes and assumption, and its relationship to other financial management tools such as one year budgets, multi-year budget projections, and the 1998 Financial Management Program (FMP) presented to Congress, see PTMP page 115, and Final EIS Volume II, Section 4.30 (Responses to Operations/Financial Comments) at pages 4-280 to 4-314, particularly Response to Comment FI-1.

2. $5 Million in "extra" expenses not in the FY03 Budget

See item one, above, regarding the relationship between the long-term financial planning analysis, budgets, and other financial management tools. The financial modeling in PTMP was designed as a comparative tool, and is not intended to predict future budgets, long-term costs, actual revenues, or other future financial decisions of the Trust. The Sierra Club continues to misconstrue the nature and intent of the financial planning analysis provided in the Final EIS, despite detailed explanations provided in the Final EIS. (See Final EIS pages cited in #1above.)

The Trust's mission is to preserve and enhance the cultural, natural, scenic, and recreational resources of the Presidio. To achieve this mission, the Trust must maximize the expenditure of available funds on capital projects, and this strategy will be reflected in the FY03 budget and in all subsequent budgets. Available funds will fluctuate annually with revenues and expenses, undoubtedly in ways that the long-term financial analysis presented in the Final EIS could not anticipate, but these funds cannot be properly viewed as "extra."

3. Residential Revenue Over Time

Table E4 in Final EIS Appendix K is generally consistent with Figure 4.1 of the PTMP. Both indicate that residential revenues will start to decline around 2013, just as annual appropriations cease. Table E4 pp. 4-5 shows $22.3 million in net residential revenue in 2002, $28.7 million in 2006, $24.2 million in 2013, $22.0 million in 2020, and $19.0 million in 2030.

Figure 4.1 is a generalized schematic diagram showing the fact that residential revenue will decline as housing is removed to achieve the Plan's natural resource objectives. This commitment has been universally supported by environmental organizations, though it comes with a steep price tag including the cost of demolition, the cost of restoration, and — inevitably — lost revenue. Even though the PTMP calls for replacement of housing needed to meet the demand by Presidio-based employees, replacement housing will generate less net revenue than existing housing. Table E4 is a modeling scenario, reflecting a simplified, conservative but perfect financial world where buildings are leased on an optimum schedule by exactly the type tenant needed; tenants are always available; they all pay market rent; costs are known and never increase; markets never fluctuate; and contingencies are always manageable. Thus, Table E4 does not show "actual numbers," but rather estimates of what could arise if all assumptions of the model were to occur. The Trust must plan to manage a more complex and uncertain financial reality, and Figure 4.1 generalizes that reality.

4. Interest Income

The Sierra Club's comment regarding interest income is responded to in the Final EIS. See Final EIS Volume II, Response to Comment FI-6 (pages 4-285 to 4-286).

5. Outside Funding Sources

The Sierra Club's comment regarding outside funding sources is responded to in the Final EIS. See Final EIS Volume II, Response to Comment FI-29 (page 4-311).

6. Assumption Regarding Parking Fees and Transit Expenses

The Sierra Club's comment regarding parking fees and transit expenses is responded to in the Final EIS. See Final EIS Volume II, Response to Comment FI-34 (page 4-313). The Trust helps to fund MUNI service with grant funds obtained from outside sources. The "impact" of this activity is increased transit accessibility, and is considered beneficial.

7. "Real" and "Constant Dollar" Interest Rates

The Sierra Club's comment concerning the model's treatment of the effects of interest is responded to in the Final EIS Volume II as noted in item #4 above. Regarding financing costs, the financial model assumes all alternatives would include $50 million in U.S. Treasury borrowing, the base-level appropriation authorized by the Trust Act. As described in Final EIS Volume II, page 4-298, "Cost estimating, particularly over a long planning horizon, is inherently uncertain . . . a change in this assumption would have to be made across the board for all alternatives, and therefore would have an equal effect across the range. For this reason, a change in [the interest rate] assumption would not [provide] new or different information in this context, where the model is used only as a . . . tool . . ." to compare the relative financial strength of a variety of land use alternatives.

8. Further U.S. Treasury Borrowing

As explained in the PTMP (page 119), Congress has authorized additional U.S. Treasury borrowing, but any additional borrowing will be subject to appropriation as part of the annual budget process. Thus, these funds are not guaranteed, and have not been included in the Final EIS analysis. See Final EIS Volume II, page 4-296 footnote 12. This decision not to assume additional borrowing for purposes of PTMP modeling does not affect the Trust's "flexibility over the next decade" as suggested by the Sierra Club. As explained in item one, above, the financial analysis presented in the Final

EIS is simply intended to test the relative strength of a variety of land use alternatives over a 20-30 year period utilizing mostly common and somewhat simplified planning assumptions. The analysis is not a projection or plan for how the Trust will budget in the future, and its assumptions will not constrain the Trust's future decision-making.

9. Letterman Digital Arts Center (LDAC)

The Sierra Club's comment regarding the need for revenue from the Letterman Digital Arts Center project is responded to in the Final EIS. See Final EIS Volume II, Response to Comment FI-28 (pages 4-310 to 4-311).

The financial model was used to test the effect, given a common set of assumptions, of eliminating the LDAC project. Without the revenue from LDAC, the PTMP would be only marginally self-sufficient in 2013, with an operating margin of around $3 million (about 4%). In addition, the time required to complete capital improvements would be extended from 2025 to 2055, and the time required to fund capital reserves and become financially sustainable would be extended from 2029 to between 2070 and 2075. In other words, if the LDAC project were foregone, the resources of the Presidio would not be preserved or enhanced for many, many generations, and would therefore face greater risks due to deferred improvements, natural disasters, and changes in circumstances.

Transit, Transportation, and Parking

Three City of San Francisco departments concerned with transportation and utility matters reviewed the Final EIS at the request of the San Francisco County Board of Supervisors. The **San Francisco Municipal Railway (MUNI)** noted three areas of interest based upon its review of the Final EIS and Response to Comments. Each is addressed below

1. The Plan and EIS should incorporate MUNI's estimates of potential transit service costs and acknowledge that the increases in ridership projected by the EIS will require significant increases in transit service.

See Final EIS Volume II, Response to Comment FI-35 (pages 4-313 to 4-314).

2. The Plan should quantitatively assess the financial capacity of the Trust to address transportation mitigation, in particular increased transit service.

The reviewer acknowledges the response to this issue in the Final EIS Volume II, Response to Comment FI-35 (page 4-313 to 4-314) with respect to transportation mitigation costs, but claims the Trust should quantitatively assess the financial needs for all mitigation. The basis for the response as to transportation mitigation costs applies equally to the costs of other mitigation measures identified in the Final EIS.

3. The Plan should reserve potential rights-of-way, sites and clearances for future transit facilities, including alignments for any future E or F line rail extension.

The Presidio Trust is dedicated to improving transit service to the Presidio, and the Trust will continue to work with MUNI to make increased transit service a reality. See Final EIS Volume II, Response to Comment TN-1 (pages 4-235 to 4-236). The Presidio Trust will play an active role in planning efforts for the E-line extension to Fort Mason and as stated in Response to Comment TN-1 and is supportive of extending such service to the Presidio. However, rights-of-way for transit service cannot be reserved prior to determination of the preferred alignment of the E-line extension.

The **San Francisco Department of Parking and Traffic (DPT)** noted a number of comments, many of which have been responded to in the Final EIS Volume II, Response to Comments. References to portions of the Final EIS that were overlooked in DPT's review and additional clarifications, as needed, are provided below.

RECORD OF DECISION

Attachment 2 – Report Accompanying the ROD

1. Clarify Final EIS Volume I, Table S-1 (page S-19 through S-21) to provide current daily vehicle trips, parking spaces, pedestrian and bicycle trips and transit trips.

Table S-1 is a summary table and the underlying information and statistics requested are in the Final EIS. The parking supply shown in Final EIS Volume I, Table 49 (page 315) for the Minimum Management Alternative reflects the current number of parking spaces in Area B of the Presidio. The reviewer can compare the relative magnitude of traffic conditions associated with each alternative to current traffic conditions by referring to Final EIS Volume I, Table 45 (page 308), which presents the expected p.m. peak hour traffic volume through Presidio gates as well as the current p.m. peak hour Presidio gateway volumes. The reviewer can also compare existing intersection levels of service to expected future levels of service during the a.m. peak hour and the p.m. peak hour in Final EIS Volume I, Tables 46 and 47 (pages 309, 310), respectively. Bicycle trips are presented in Final EIS Volume I, section 4.5.4 (pages 316-317) and transit trips in Final EIS Volume I, section 4.5.5 and Table 50 (page 319).

2. Mode split surveys

See Final EIS Volume II, Response to Comment TR-10 (page 4-230).

3. Presidio Internal Shuttle

See Final EIS Volume II, Response to Comment TN-3 (page 4-230).

4. Levels of Service (LOS) for Intersections

Existing intersection LOS are shown in the Final EIS Volume I, Tables 46 and 47 (pages 309, 310).

5. Letterman Digital Arts Center Parking

See Final EIS Volume II, Response to Comment TDM-13 (page 4-261). See also the Trust's Letterman Complex EIS finalized in May 2000.

6. Transportation Mitigation Measure TR-3

The Trust recognizes the difficulty in negotiating the right turn from the curb lane of 25th Avenue to Lincoln Boulevard without encroaching into the intersection's westbound left-turn lane. However, the Trust's preliminary study of geometrics of this intersection indicates that this issue can be resolved by restriping the westbound approach and possibly the northbound approach of the intersection. The various alternatives for restriping these intersection approaches to accommodate buses turning right from 25th Avenue to Lincoln Boulevard could require that on-street parking be removed on the west side of 25th Avenue or the north side of Lincoln Boulevard rather than the east side of 25th Avenue as described in the PTMP FEIS. Trust staff will conduct more detailed study of possible restriping alternatives, and subsequently review alternatives with the San Francisco Department of Parking and Traffic when traffic volumes reach levels that warrant improvement. It should also be noted that tour buses are restricted from using the 25th Avenue gate, and that at most only four Muni buses per hour currently make this turning maneuver and that this number is not expected to increase significantly for several years.

7. Transportation Mitigation Measure TR-11

See Final EIS Volume II, Response to Comment TR-15 (page 4-232). The Trust is currently evaluating various alternatives for reopening the 14th Avenue gate to vehicular traffic that would avoid installation of a traffic signal at this location. Trust staff will present the results of this analysis to the San Francisco Department of Parking and Traffic for review and consideration, and subsequently to interested neighborhood groups. With the basic one-way couplet configuration analyzed in the Final EIS, both the northbound and southbound approaches to the 14th/Lake intersection

would operate at a poor level of service during both the a.m. and p.m. peak hours. In 2020, the Final Plan alternative is estimated to add 54 and 120 vehicles to the northbound approach in the a.m. and p.m. peak hour, respectively.

8. Transportation Mitigation Measure TR-12

Trust staff have evaluated alternative improvements to this intersection that would allow it to operate at an improved level of service during peak commute hours, and have preliminarily discussed these improvements with the San Francisco Department of Parking and Traffic. Provision of a southbound right-turn lane and the possible provision of a northbound left-turn lane have been identified as alternatives to the eastbound left-turn lane described in the mitigation measure for this intersection. The Trust will continue to review these alternative improvements with the Department of Parking and Traffic to identify the most appropriate mitigation strategy for this intersection.

9. Transportation Mitigation Measure TR-15

See Final EIS Volume II, Response to Comment TR-15 (page 4-232). Some of the alternatives analyzed for the reopening of the 14th Avenue gate discussed above would also affect the routes of traffic previously projected to travel through the 14th/California intersection. If two-way STOP-control is maintained at the intersection of 14th/Lake, improvements at the 14th/California intersection may not be warranted. Trust staff will work with the San Francisco Department of Parking and Traffic to design the appropriate mitigation strategy for the 14th/California intersection if and when improvement is warranted.

10. Transportation Mitigation Measure TR-21

It is impossible to foresee the types, sizes and locations of special events in the Presidio. However, as stated in Mitigation Measure TR-24, special events that could result in overflow parking would be coordinated to ensure that parking supply in the Presidio is not exceeded or can be accommodated.

The **San Francisco Public Utilities Commission** reviewed the Plan and EIS concluding "most of our comments and concerns were addressed satisfactorily." Several issues, claimed not to have been addressed, are clarified below.

1. Meeting Presidio water supply demands

The SFPUC asks how the Presidio's water demands will be met if groundwater supplies are lost and the SFPUC cannot "supply all of the Presidio's water demand." This issue was previously addressed. See Final EIS Volume II, Response to Comment UT-1 (pages 4-267 to 4-268). The Trust is not currently nor is it proposing in the future to use groundwater resources to meet water demand at the park. The SFPUC does not supply "all of the Presidio's water demand" and in fact, the majority of demand is met by on-site water resources from Lobos Creek. As has been the case historically, on-site supplies are supplemented with water purchased from the SFPUC on an as-needed basis. The volume purchased varies year to year, and last year the Trust purchased approximately 15% of the total water consumed at the Presidio from the SFPUC. The Trust is actively pursuing actions to minimize the use of off-site water through a combination of aggressive conservation and development of an on-site water recycling system. The on-site water recycling system was recently approved by the Trust based upon a separate and independent environmental assessment and finding of no significant impact under NEPA.

The Presidio is a retail customer of the SFPUC and as such, the purchase and use of water from the SFPUC is subject to its water shortage regulations, including mandatory water rationing programs and rate structures adopted during drought conditions. The Mitigation Measure UT-2 (Water Shortage Emergency Response) was modified in response to the SFPUC's comments on the Draft EIS to specifically acknowledge these requirements.

2. Stream restoration projects and groundwater conditions

See Final EIS Volume II, Responses to Comments WR-3 and WR-4. Restoration of the Tennessee Hollow Watershed was identified and evaluated at a programmatic level in the PTMP EIS. As described in Volume II of the Final EIS, Responses to Comments WR-3 and BR-4, the Trust is currently conducting within the watershed a ground and surface water monitoring program, which will be used in the public planning and environmental review process currently underway for this project. Additional detail on the potential ground water resource effects resulting from the various restoration alternatives will be identified and evaluated in the Trust's forthcoming NEPA document for the Tennessee Hollow Watershed Restoration Project.

3. Recycled water and groundwater quality

See Final EIS Volume II, Response to Comment UT-5. As indicated in Volume II of the Final EIS, Response to Comment UT-5, an analysis of the Presidio water recycling project's effect on groundwater quality is provided in a separate NEPA document. Refer directly to Section 3.3 of the July 2002 Presidio Water Recycling Project Environmental Assessment (EA) for additional information. Copies of the Final EA have been previously sent directly to the SFPUC.

4. Using recycled water during wet weather

The SFPUC asks how recycled water will be used during wet weather. As described in Section 2.2 of the Presidio Water Recycling Project EA, there are two seasonal operational scenarios that can be implemented. The first is to shut down the plant during the winter months when irrigation demand is low or absent. Under this scenario, no recycled water would be produced during wet weather. The second operational scenario ("continuous operation") was developed and evaluated in the EA at the request of the City and County of San Francisco. Under this scenario, the water recycling plant would be continuously operated and would produce recycled water on as-needed basis to meet off-peak irrigation demands. During a peak weather event, the Trust could increase production of the plant and store recycled water on-site. Following the event, the treated water could either be used to meet irrigation demand or would be diverted back to the City's combined sewer system.

Maps

The San Francisco DPT commented on the maps presented in the Final EIS at pages 31, 45, 51, and 57 (Figures 6, 8, 10 and 12)

Response: For each alternative, two figures are presented in the Final EIS — future land uses and building use preferences. For four of the alternatives, the base map used to present building use preferences show the existence of Wherry Housing and associated roads, and the inclusion of these existing features on the base map caused confusion for one reviewer. Under each of these four alternatives (Final Plan, Resource Consolidation, Sustainable Community, and Cultural Destination), Wherry Housing is removed to accommodate open space and native plant community expansion, and its removal is clearly indicated in the land use graphics for each alternative (Figures 5, 7, 9, and 11) as well as in the text description and throughout the analysis provided in the Final EIS. Reviewers should refer instead to the land use preference maps for the accurate depiction of the long-term treatment of Wherry Housing.

ATTACHMENT 3

ERRATA

ATTACHMENT 3
ERRATA

The following text corrections are incorporated by reference into the Presidio Trust Management Plan Final EIS and Final Plan as specified below. Changes include the correction of typographical, mathmatical or other errors which were discovered following release of the Final EIS and Final Plan documents and/or are clarifications provided in response to public comment as summarized in Attachment 2 (Report Accompanying the ROD). These changes do not substantively alter the conclusions of the EIS or otherwise influence the basis upon which the Presidio Trust has made its decision regarding this project.

Changes are generally presented using verbatim quotes from the relevant document and underline/strikeout, unless otherwise noted. Page and section numbers are provided as a guide for the reader.

FINAL EIS VOLUME I

Table S-1: Summary of Environmental Consequences and Mitigation:

Page S-9: Section 4.2.2 Archaeological Resources, Final Plan Variant column:

- Text should be corrected to include the word "no" as follows: "Similar impacts to the No Action Alternative except there would be **no** potential effects due to new construction."

Page S-14, Section 4.3.5 Noise (General Construction/Demolition Noise), Final Plan Variant column:

- The following text should be added at the end of the sentence: "Demolition activities would have similar potential to intermittently disrupt tenants, recreational users and residences **as described under the Final Plan Alternative**."

Page S-19, Section 4.5 Transportation and Circulation (Increased Congestion on Local Roadways), Minimum Management Alternative column

- The following text should be added at the end of the sentence: "Unacceptable service levels at the same intersections as the No Action, plus 8 in the a.m. and 5 **in the p.m**."

Page S-20, Section 4.6.1 Water Supply and Demand, Cultural Destination Alternative column:

- Text should be corrected as follows: "Projected daily water demand would be the highest under this alternative at ~~08.4~~ **0.84** to 2.08 mgd, and…"

Page 11, 1st paragraph: The redundant reference to the GGNRA Act is removed as follows:

- "The Trust Act sets forth two overall requirements of the Trust. First, the Trust must manage the leasing, maintenance, rehabilitation, repair and improvement of property within Area B of the Presidio in accordance with the purposes set forth in the GGNRA Act (Public Law 92-589, 86 Stat. 1299; 16 U.S.C. § 460bb). Second, the Trust must manage the leasing, maintenance, rehabilitation, repair and improvement of property within Area B in accordance with ~~the purposes of the GGNRA Act and~~ the "general objectives" of the GMPA."

RECORD OF DECISION

Attachment 3 – Errata

Page 28, Section 2.5.2 and Page 271, Table 39: add a footnote as follows:

- "The Final Plan Alternative states as a preference residential use of the PHSH building, which is approximately 314,000 square feet including both historic and non-historic portions. (Non-historic portions may be removed and replaced elsewhere on the site). Residential use of the building is the Trust's preference, despite the assumption in the Final EIS analysis that only 200,000 square feet would be in residential use, with the bulk of remaining square footage in educational use. Because educational use represents a more intense use, in terms of the number of persons on site, the number of peak period automobile trips, and other considerations, the assumptions inherent in the Final EIS analysis are considered more conservative (i.e. they would generate more impacts and less revenue) than the preference stated in the Plan, and thus did not warrant modification between the Draft EIS and the Final EIS. Nothing in the Final EIS analysis should be construed as negating the Trust's preference for residential use of the PHSH building, and the potential educational use of auxiliary structures in the PHSH complex."

Pages 292 through 296, Section 4.4.4 Visitor Experience:

- Projected visitation is provided for each alternative in this section. This text should be corrected to state that these estimates account for recreational visitors to both Areas A & B, not just Area B as presented it the Final EIS. (Table 1, beginning on page 19, correctly notes this fact.)

Pages 309 & 310 (Tables 47 and 48):

- The following footnote should be added to both tables: "**For two-way STOP-controlled intersections, the LOS is presented for the worst approach**."

Page 377, Section 5.1 (History of Public Involvement): The word "Trust should be added to the first sentence as follows:

- "The Presidio **Trust** considers public involvement…."

FINAL EIS VOLUME II (RESPONSES TO COMMENTS)

Page 4-256, top of right column:

- A new column entitled "Average Auto Occupancy" should be added to the table summarizing auto reduction goals and standards as follows:

	Internal Trips	External Trips	Average Auto Occupancy
Minimum Standards:	50% by auto	70% by auto	1.4 persons/auto
Long-Term Goal:	35% by auto	50% by auto	1.4 persons/auto

Beginning on Page 6-1 (Directory of Responses to Comments):

- Add the following commentors:

  Ausman, James: (HO-1) 4-173

  Dodge, Shannon: (HO-1) 4-173

Edwards, Jenie: (PR-16) 4-214; (PR-17) 4-215

Ellingham, Lewis: (BR-3) 4-143; (NC-1) 4-163

Friman, Mary: (AL-3) 4-68

Gallagher, John: (PI-6) 4-49; PR-14 (4-213)

Kwan, Wai Ching: (HO-1) 4-173

Moussa, Susan: see TS general

Palsic, Cheryl: (NC-1) 4-163

Raford, Noah: (HO-1) 4-173

Schulte, Faye: (NC-1) 4-163

Trost, Cecilia: (PI-6) 4-49

Williams, Keira: (NC-7) 4-167

PRESIDIO TRUST MANAGEMENT PLAN

Page viii, Figure I, and page 108, Figure 3.8, add a footnote as follows:

- "For the correct delineation of VMP zones (historic forest, native plant communities, and designed landscaped areas) in the southwestern quadrant of the Presidio, see Figure 1.2, page 8."

Page 46, last paragraph in right column to be edited as follows:

- "At a minimum, the TDM program is designed to reduce vehicle trips so that trips involving automobiles will represent a maximum of 70 percent of external person trips and 50 percent of internal person trips, **assuming an auto occupancy rate of 1.4 persons per vehicle**. Above and beyond this minimum standard, the Trust plans to pursue an aggressive long-term goal for automobile trip reductions as transit services are expanded, and as the resident and employee populations of the Presidio approach historic levels. The long-term goal is to reduce vehicle trips and increase auto occupancy such that only 50 percent of all external trips and 35 percent of all internal trips are by auto, **assuming an auto occupancy rate of 1.4 persons per vehicle**."

Page 101, 2nd to last sentence in left column to be edited as follows:

- "Compatible recreational activities will be allowed, although ~~Paul Goode Field~~ **Morton Street Field** may be removed or relocated to allow for restoration of Tennessee Hollow."

Appendix D, Page D-1, First and Second Paragraphs to be edited as follows:

- "The Presidio Trust (Trust) has an aggressive Transportation Demand Management (TDM) program in place to reduce overall reliance on the automobile by encouraging alternatives such as walking, biking, carpool/vanpools, and transit. With implementation of the PTMP, the program will be expanded to achieve minimum standards for reduced auto use. No more than 70 percent of external trips that start or end at the Presidio will be by private auto, and no more than 50 percent of internal trips within the Presidio will be by private auto, **assuming an auto occupancy rate of 1.4 persons per vehicle**. **If the average auto occupancy is less than 1.4, the auto mode share would need to be lower in order to meet the minimum standards.**

In the long-term, when transit services to the Presidio are expanded and the population and employment figures reach historic levels, these minimum standards will be exceeded. The long-term goal is to reduce vehicle trips so that only 50 percent of external trips and 35 percent of internal trips are made by automobiles, **assuming an auto occupancy rate of 1.4 persons per vehicle**."