

R E C O R D O F D E C I S I O N

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I M P A C T S T A T E M E N T &
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As part of the Golden Gate National Recreation Area, the Presidio's significant natural, historic, scenic, cultural and recreational resources must be managed in a manner which is consistent with sound principles of land use planning and management, and which protects the Presidio from development and uses which would destroy the scenic beauty and historic and natural character of the area and cultural and recreational resources.

—From the Presidio Trust Act (P.L. 104-333)

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The Presidio Trust (Trust) has prepared this Record of Decision (ROD) for the *Final Environmental Impact Statement and Planning Guidelines for New Development and Uses on 23 Acres within the Letterman Complex* (FEIS) at the Presidio of San Francisco. The FEIS is a supplement to the *Final General Management Plan Amendment Environmental Impact Statement for the Presidio*. The Presidio Trust (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.), and NEPA’s implementing regulations promulgated by the Council on Environmental Quality (CEQ) (40 C.F.R. 1500 et seq.).

The ROD documents the decision and rationale for selecting a proposed development alternative for the 23-acre site in compliance with the mandates of the Presidio Trust Act (Trust Act) and as guided by the 1994 General Management Plan Amendment (GMPA). The document is a statement of the decision, alternatives considered, the nature of public involvement, and mitigating measures developed to avoid or minimize environmental impacts. Based upon public comments received on the April 1999 *Draft Environmental Impact Statement and Planning Guidelines for New Development and Uses on 23 Acres within the Letterman Complex* (DEIS), the Trust made appropriate changes to the text and in March 2000 released the FEIS. The Trust received comments on the DEIS from 163 agencies, private organizations, and private citizens.¹ The Trust’s responses to the comments can be found in the second volume of the FEIS. Additional comments have been received on the FEIS, and responses, as appropriate, are part of and attached to this ROD.

1 Background

The Unique Presidio Site – The 1,480-acre Presidio of San Francisco is one of the country’s great natural and historic sites. It possesses an extraordinary combination of natural beauty, ecological diversity and historical significance. A military garrison for nearly 220 years under three different flags, the Presidio is a National Historic Landmark within the Golden Gate National Recreation Area (GGNRA), an extensive national park that begins where the Pacific Ocean meets the San Francisco Bay. The Presidio is unique within the national park system. Its natural and historic setting is integrated into 700 developed acres with more than 780 buildings and approximately 6.0 million square feet of building space. Of the total, approximately 500 of the Presidio’s buildings have historic and cultural significance. Its offices, warehouses, residential areas, more than 1,100 housing units, roads system, utility infrastructure, retail stores, tennis courts, bowling center, theater, swimming pool, golf course, gymnasiums and other facilities are within a park boundary that itself is located within an amalgam of heavily urban and suburban communities. The Presidio’s characteristics make it an exceptional place for people to live, learn, work, and play.

From Military Post to National Park – The Presidio’s transition from military post to national park began in 1972, when, in the legislation creating the GGNRA (Public Law 92-589), Congress included a provision that the Presidio would become part of the GGNRA if the military ever declared the base excess to its needs. The Presidio was designated for closure in 1989; the Presidio’s long-time occupant, the U.S. Army, transferred the jurisdiction over the Presidio to the National Park Service (NPS) in 1994. As part of the transition, the NPS in

¹ This includes a single organization’s electronic form letter that was sent by 100 individuals.



July 1994 completed and issued a final General Management Plan Amendment (GMPA) for the Presidio laying out a vision for its future use and management. While NPS's GMPA set out general land use plans for 13 distinct Presidio planning areas involving a varied mix of preservation, rehabilitation, demolition, and new construction, the GMPA contemplated that more detailed site-specific plans and designs with supplemental environmental analysis would be prepared during its implementation.

Innovative Approaches and Authorities for the Presidio – Once the plan was created, difficult issues remained of how to fund the implementation of the plan. NPS recognized that implementing the GMPA would require innovative approaches and unique authorities to manage those aspects of the GMPA outside of NPS's expertise, such as leasing, repair, property management, and fund-raising. As Congress debated the creation of a new managing entity, estimates of costs to implement the GMPA showed the Presidio to be by far the most expensive park managed by NPS. NPS estimated annual costs at \$40 million and capital improvement cost estimates ranged from \$490 million to \$741 million. By way of contrast, the annual cost of maintaining Yellowstone, the next most expensive park in the national park system, is \$20 million. In view of these projections, Congress was unwilling to commit the extent of federal monies needed over the long-term to improve, protect, and maintain the Presidio, but was willing to create an innovative entity that would be charged with achieving these goals.

Creation of the Presidio Trust and Its Unique Mandate – In 1996, Congress established the Presidio Trust (Trust) pursuant to the Presidio Trust Act (16 U.S.C. 460bb appendix) (Trust Act). In response to competing public policy goals, Congress gave the Trust the unique responsibility to reduce and eventually eliminate the costs of the Presidio to the federal government while retaining the Presidio within the GGNRA. To achieve these goals, Congress provided only a limited budget, which would incrementally decrease to zero over 15 years, and provided no appropriated funds targeted for needed capital expenditures to preserve the park resources. Although it did not provide full funding, Congress granted the Trust a unique set of authorities to accomplish the Trust Act's goals. The Trust has authority to generate and retain revenue and to borrow money from the U.S. Treasury to finance repair and rehabilitation of the Presidio's historic structures, and flexibility in operating procedures to secure Presidio tenants in an ever-changing environment.

The Presidio Trust is a wholly-owned federal government corporation whose purposes are to preserve and enhance the Presidio as a national park, to ensure that the Presidio becomes financially self-sufficient by 2013 (i.e., generate sufficient revenue without any federal appropriation to fund long-term operating and maintenance costs and to fund capital reserves for ongoing capital expenditure needs). The Trust assumed administrative jurisdiction over 80 percent of the Presidio on July 1, 1998, and NPS retains jurisdiction of the coastal areas. The Trust is managed by a seven-person Board of Directors, on which a Department of Interior representative serves. The Trust brings to the Presidio diverse experience, including real estate leasing, finance, development and property management, and will apply this expertise to lease more than 3 million square feet of new and historic building space and more than 1,100 housing units in the Presidio. NPS, in cooperation with the Trust, provides visitor services and interpretive and educational programs throughout the Presidio.

The GMPA as Master Planning Document – In carrying out the mandates of the Trust Act, the GMPA, finalized by NPS in 1994, is the foundational plan that guides the Trust's planning and decision making. Its importance



is reinforced by both the Trust Act and Trust policy. The Trust Act directs the Presidio Trust to manage the property under its administrative jurisdiction in accordance with both the purposes of the Act establishing the GGNRA and in accord with the “general objectives” of the GMPA. While the general objectives set forth in Presidio Trust Board Resolution 99-11 dated March 4, 1999 (General Objectives) are the Act’s required guideposts, the Trust continues to use the GMPA as the master document to guide its decision making, despite the fact that changed conditions at times require the Trust to reassess certain of the GMPA’s site-specific plans and programs. In sum, as a matter of law, the Presidio Trust follows the General Objectives of the GMPA, and as a matter of policy, the Trust uses the GMPA as its principal guide for all planning activities.

The Presidio’s Letterman Complex – The Letterman Complex, located in the northeast portion of the Presidio, is in close proximity to the Marina District of the city of San Francisco outside the Lombard Street Gate. It is, and historically has been, one of the most urbanized locations within the Presidio. Intensive use of the site began in 1898 with the construction of the original Letterman Hospital, which established this area of the Presidio as a link to the adjacent city. By 1915, the 23-acre site became home to a portion of the Panama Pacific International Exposition, and after World War I it was the site of the East Letterman Hospital expansion. Between 1965 and 1976, as the military planned for a more modern hospital site, the East Hospital at the 23-acre site was removed to make way for two new and more modern structures, the 451,000-square-foot Letterman Army Medical Center (LAMC) and the 356,000-square-foot Letterman Army Institute of Research (LAIR).

Consistent with the intensity of historic use, the Letterman Complex was designated under the Presidio GMPA as one of the “building and activity cores” where building demolition and replacement construction would occur. The complex contains approximately 1.3 million square feet in about 50 buildings. The bulk of that space is contained in a 23-acre site that includes the non-historic, functionally obsolete LAMC and the non-historic LAIR, which dominate the area. An additional 158,000 square feet of space are included in the Thoreau Center for Sustainability, which exists within buildings recently rehabilitated in the historic hospital complex. The Letterman Complex also contains surface parking lots, landscaped areas and approximately two miles of roadways.

The Letterman Complex/Lead Project and Economic Engine – Before Congress could create the new federal entity (now the Presidio Trust) and with the Presidio buildings and infrastructure in critical need of rehabilitation and repair, Congress enacted special legislation giving NPS interim leasing authority for the Letterman Complex to begin implementing the GMPA. Recognizing the Letterman Complex as having the greatest revenue-generation potential for the Presidio, NPS chose to pursue leasing of Letterman facilities in order to generate sufficient revenues early in the GMPA’s implementation to address the critically deteriorating condition of other Presidio facilities. In 1994, therefore, NPS solicited potential tenants for the Letterman Complex, and entered into lease negotiations with the University of California at San Francisco (UCSF) to occupy the two largest facilities on the site: the hospital and research center. Although NPS ultimately leased a small portion of the buildings at other parts of the complex, the negotiations with UCSF (and others) subsequently failed, and what to do with the still vacant hospital and research center facilities on the 23 acres at the southeast portion of the site became one of the Trust’s early responsibilities following its creation in 1996.



The Trust has now turned its efforts to the unfinished Letterman Complex implementation. Under the Presidio Trust Act, the Presidio Trust is considered the successor-in-interest to the NPS for purposes of compliance with NEPA. Thus, to the extent that the Trust seeks to implement proposals that previously have been adequately analyzed under the GMPA EIS, the Trust may rely upon that earlier analysis. Where the Trust's proposals depart from the plans previously analyzed under NEPA, however, the Trust undertakes further environmental review consistent with the requirements of NEPA, the National Historic Preservation Act (NHPA), and other relevant environmental review laws and executive orders.

The proposed Letterman project is needed to achieve the varied mandates of the Trust Act. The Trust was considering the new Trust Act mandates when it returned to the implementation of the planning process that the NPS had started several years earlier for the Letterman Complex. The proposed project is intended to serve as an economic engine, generating early and significant revenue to pay for capital improvements and historic building rehabilitation that, in turn, will allow revenue generation at other areas of the Presidio.

To ensure sufficient revenue generation from the Letterman project to meet the self-sufficiency projections as set forth in the Financial Management Program (FMP) required by Congress, the Trust proposed an offer of development of 900,000 square feet within a 23-acre site at the Letterman Complex.² This proposal fairly approximates the density of development currently existing on the 23-acre site, and was largely consistent with the GMPA's leasing and financing implementation strategy for the Letterman Complex.

2 *Decision*

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 in consideration of the mandates of the Presidio Trust Act together with the plan set out in the GMPA, the Trust has determined to adopt and implement Alternative 5 of the FEIS as the development alternative for the 23-acre site at the Letterman Complex. Features of Alternative 5 are fully described in Section 4.5 of the FEIS.

3 *Alternatives Considered*

In response to the unique financial, planning, and tenant selection mandates of the Trust Act (see FEIS Section 1.2.1), of key importance to the Trust's process was to identify alternatives based upon proposals that the marketplace could actually offer. Building the process of alternative identification around this criterion was intended to avoid the result of having studied and selected a prospective use for a particular site for which no tenant could ultimately be found, as was the case when UCSF and others failed to lease the Letterman facilities following the GMPA EIS (see FEIS Sections 1.1.7 and 1.2.2). Therefore, the Trust, through a Request for Qualifications (RFQ) and later Request for Proposals (RFP) for the Letterman Complex, solicited market-based

² The "Letterman Complex" is identified in the GMPA as a 60-acre geographic area in the northeast corner of the Presidio consisting of approximately 50 buildings, both historic and modern. This proposal is for redevelopment on 23 of those 60 acres, and involves only non-historic structures.



proposals seeking submitters capable of ground leasing and developing 900,000 square feet of new replacement construction on a 23-acre site within the Letterman Complex. A project of 900,000 square feet was necessary to achieve the financial expectations of the FMP, and the 23-acre site approximated the density that already existed and was proposed as a possibility by NPS's Letterman RFQ at this developed site (see FEIS Section 1.2.2).

A summary of the six alternatives is provided in Table 1 of the FEIS. Alternative 6, Minimum Management, has been included in the analysis to evaluate the impacts of a "no action" alternative as required by NEPA. Similarly, the Trust has included Alternative 1, the Science and Education Center, to provide a useful baseline study of the impacts of implementing the GMPA alternative, as updated by current circumstances. Alternatives 2, 3, 4, and 5 present a range of real-world alternatives based upon proposals submitted in response to the Trust's 1998 RFQ.

3.1 Alternative 1: Science and Education Center (Updated GMPA Alternative)

This alternative would dedicate the entire 60-acre Letterman Complex to scientific research and education focusing on issues of human health, including preventive medicine, nutrition, collaborative eastern/western medicine and health concerns related to the environment. Public participation, information and education about ongoing activities would be an important component of all research programs. The LAIR would be rehabilitated and leased for reuse as a research/office facility. The LAMC could be rehabilitated or partly or entirely removed. Up to 503,000 gross square feet of replacement construction, including infill construction outside the 23-acre site and within the adjacent historic hospital complex, could substitute for LAMC and other buildings identified for demolition. New construction would occur if existing buildings and improvements could not meet essential program and management needs.³

3.2 Alternative 2: Sustainable Urban Village

This alternative would create a sustainable village campus on the 23 acres for health care, education, office, and residential uses, and an inn, organized around a central "commons." Both the LAMC and LAIR buildings would be removed and replaced with up to 900,000 gross square feet of new construction to be located only on the 23-acre site. Institutional facilities would focus on issues related to seniors' health. Educational facilities would include a culinary institute and a professional graduate institution for eastern medicine. For-profit, high-tech companies and non-profit organizations would occupy office space. Housing would be leased to students enrolled at the educational facilities, other persons working in the Letterman Complex, and the general public. The inn would provide lodging for Presidio visitors, as well as a conference and retreat facility for adjacent institutional and health research tenants. Urban agriculture, aquaculture, and a marketplace for selling produce grown on the 23-acre site would be integrated into the open space.

3.3 Alternative 3: Mixed-Use Development

This alternative would be a mixed-use development on the 23 acres that includes a conference center with lodging, a senior living center, a culinary institute, and office space for non-profit and for-profit organizations.

³ No applicant has come forward to back such an alternative, despite the Trust's, and previously NPS's, efforts to identify and interest such an applicant.



The conference facility would serve as a national and international learning and education center, providing a wide range of activities that include training programs available to the Presidio community. A 350-room lodge would support the conference center and be available for Presidio visitors and tenant needs. The senior living facility would consist of assisted living accommodations and nursing care. Onsite services would provide convenience shopping, food, and other services to Presidio visitors and residents. This alternative would require the removal of the LAMC and LAIR buildings, which would be replaced with up to 900,000 gross square feet of new construction on the 23-acre site.

3.4 Alternative 4: Live/Work Village

This alternative would be a mixed-use village of offices, institutions, housing, and support services on the 23-acre site. The village would include an anchor tenant devoted to Internet media, communications and education, complemented by a variety of smaller organizations with a mix of for-profit and non-profit groups. Presidio village tenants would focus on conservation, cultural and park issues. The buildings would be clustered around a central “green.” Housing would be a key component of this alternative to enhance the village-like setting and encourage a live/work community. The village green would serve as a gathering place for informal and planned public activities. The LAMC and LAIR buildings would be removed and replaced by 900,000 gross square feet of new construction to be located only on the 23-acre site.

3.5 Alternative 5: Digital Arts Center (Preferred Alternative)

This alternative would serve as a 23-acre office campus occupied primarily by a single institutional user engaged in research, development and production of digital arts and technologies related to the entertainment industry. Programs would include a visual effects and digital animation company; an interactive entertainment provider; and an educational software provider; a movie screen and home-theater visual and sound technology provider; a developer of websites and content provider related to the parent company; and a non-profit educational foundation. A visual effects archive would be established which would make materials available to industry researchers, historians, scholars, academicians and other individuals interested in studying the evolution of visual effects. A museum of visual arts and technology that would be open to the general public might also be included as an alternative to the archive facility. A digital arts training institute would also be established that would offer tuition-free intensive training in the field of digital arts to candidates of advanced study in computer graphics. Educational opportunities would be offered to others as well. A 7-acre park or “great lawn” with a water feature would be a significant site feature for park visitors and the center’s employees. The LAMC and LAIR buildings would be demolished and replaced by 900,000 gross square feet of new construction on the 23-acre site.

3.6 Alternative 6: No Action

This alternative would call for the Presidio Trust’s management of the 23-acre site in accordance with 1) the purposes set forth in Section 1 of the Act that established the GGNRA and 2) the General Objectives of the Presidio GMPA. Programs would be designed to reduce expenditures by the Trust and increase revenues to the federal government to the maximum extent possible, subject to applicable environmental compliance statutes. Tenants would be encouraged, but not required, to provide public programs related to the park’s purpose. LAMC would be “mothballed”; LAIR would be permitted/leased for office and research use without major rehabilitation. This building would be brought into compliance with federal building codes and regulations



appropriate to use and occupancy to the extent practicable. Demolition of other buildings would occur if they are identified in the GMPA for demolition and could not be cost-effectively rehabilitated. New construction, if any, would replace existing structures with others of similar size. Limited site improvements and cultural landscape rehabilitation would be carried out.

4 Identification of the Environmentally Preferred Alternative

CEQ regulations require that an agency identify its environmentally preferred alternative or alternatives (40 C.F.R. § 1505.2(b)). Identification of the environmentally preferred alternative(s) need not coincide with the alternative selected for implementation because the decision to select a particular alternative for implementation may involve other factors than environmental quality. After considering impacts to each resource topic by alternative, the Trust has determined that both Alternative 1 (Science and Education Center) and Alternative 2 (Sustainable Urban Village) are environmentally preferred alternatives.

Each of the six alternatives considered involves some environmental impacts that are significant, unavoidable, and adverse.⁴ Under these circumstances, the identification of the environmentally preferred alternative requires a complex balancing of one environmental impact against other differing environmental effects. Here, each alternative has an unavoidable adverse effect on the cultural resources of the Presidio and on short-term noise impacts. Alternative 2 is the only alternative limited to these two impacts, and for that reason it is the alternative with the least unavoidable adverse environmental effects. On numbers of effects alone, therefore, the Trust has identified Alternative 2 as an environmentally preferred alternative.

An analysis based purely on numbers of effects may be informative, but it is not the only method to evaluate what may be environmentally preferable under these circumstances. Another means of evaluation is to emphasize the value of certain environmental factors over others. Here, where the Presidio was preserved as a park in part because of the importance of preserving its cultural and historic resources, it is possible to weight the potential impact on the cultural resources more heavily than other environmental effects. Alternative 1 arguably has the most significant unavoidable adverse environmental effects because it involves unmitigated effects on the cultural and visual resource due to the retention of LAIR, and on long-term air quality and short-term noise impacts. Alternative 1, however, also has a potentially offsetting beneficial effect on the cultural resource through the removal of LAMC and replacement as infill construction elsewhere within the 60-acre complex. By allowing for new infill buildings to be constructed around the adjacent historic hospital, Alternative 1, although it has a number of other adverse and unavoidable environmental effects, has the potential to restore the historic pattern of development and would therefore have a potentially beneficial effect on the historic setting within the Letterman Complex.

Because Alternative 1 is the only alternative that would provide for compatible infill construction outside the 23 acres to reinforce the historic pattern of development, it has been identified as the alternative that has the

⁴ All six alternatives have an unavoidable adverse effect on cultural resources and on short-term noise. Alternatives 3 and 5 have an unavoidable adverse effect on housing. Alternatives 1 and 6 have unavoidable adverse effects on visual resources, and Alternatives 1 and 4 have unavoidable effects on air quality.



potential to best protect and enhance cultural resources within the complex. While environmentally preferable for this reason, Alternative 1 is not consistent with the financial mandates of the Trust Act because there is no market proposal to implement this alternative. Despite the earlier NPS efforts and the more recent ones of the Trust to identify and interest a potential medical research tenant, none have emerged.

5 Reasons for the Decision

The Trust has selected the alternative that, in its judgment, best fulfills the purpose and need outlined in Section 1 of the FEIS, including the specific goals for the project (see FEIS Section 1.3). The project’s purpose and need reflect two overarching objectives: to fulfill the mission of the Presidio as a park while at the same time supporting the Presidio’s financial self-sufficiency. The decision to select Alternative 5 for implementation is based upon having considered all of the following factors independently and selecting the alternative that collectively best satisfies all of the various concerns.

5.1 Consistency with General Objectives and Contribution to GMPA Programs

In comparison to the other alternatives, Alternative 5 provides a development proposal that best serves Presidio themes with its focus on fostering creative arts and education, research and innovation, scientific discovery, community service, and public outreach. Consistent with both the GMPA and its General Objectives as determined by the Trust, Alternative 5 enhances the scenic resources of the Presidio by removal of both the LAMC and LAIR buildings, modern structures that block view corridors and are architecturally non-distinctive and clash with their surroundings. Furthermore, of all the action alternatives, Alternative 5 is most consistent with and fairly approximates the development envisioned in the GMPA, because it retains the site for science and research purposes primarily by a single institutional user or collaborative group of users devoted to innovative research and development. Alternative 5 also fairly approximates the GMPA in its public access aspects, the extent of open space (actually increasing unpaved open space), in its enhancement of visitor services and amenities, and in the absence of a housing component. Furthermore, of all the proponent-supported alternatives, Alternative 5 provides strong support for park interpretive programs using its own innovative technology and techniques to enhance the national park visitor experience.

5.2 Revenue Generation and Financial Capability

Alternative 5 is on par with Alternatives 2 through 4 in terms of revenue generation and financing capability. The proponents of Alternative 5 are fully capable of meeting the revenue generation requirements established by the FMP, and will provide their own internal financing for the project. Furthermore, in a more speculative project, as in Alternatives 2, 3, and 4, the developer must often secure tenants before financing can be assured, creating an element of initial uncertainty for the Trust regarding whether the proposal will in the end support the Presidio’s financial self-sufficiency goal. The revenue generation goal and financing capability could not be achieved under Alternative 6 (no action) or Alternative 1. Attempts by NPS to implement Alternative 1 under the authority of special interim legislation before the Trust was created failed because no market-based user was capable or willing to implement the proposal.



5.3 Desired User or Tenant

A unique strength of Alternative 5 is that the improvements will be occupied primarily by a known collaborative group of users. The proposal is the only one of the four action alternatives where the proponent will also be the primary user and occupant of the premises. The other proponent-based alternatives each involved speculative uses, making the full tenancy of the project dependent upon who the developer can ultimately attract. For Alternative 5, where the primary users are known, the Trust is best able to assess the user/owners' compatibility with the Presidio's mission and programmatic goals.

5.4 Development Concept and Design

Alternative 5, unlike the other proponent-supported alternatives, offers a signature development unique in the Presidio and the world because of its cutting edge focus on film and innovative development of digital arts and technology. The strength of its programmatic concept is bolstered by a strong site design concept, including a new 7-acre park ("Great Lawn"). The alternative's proposed design reflects the historic Letterman patterns of development with long rectilinear buildings interconnected by galleries. This overall site design is appropriate and responsive to the historic character of the Presidio, and will serve ultimately to enhance the Presidio's cultural landscape. Through application of the Planning and Design Guidelines, there is opportunity to strengthen the design to be more compatible with the National Historic Landmark setting (see mitigation measure CR-1, *Planning and Design Guidelines* in Attachment 1).

5.5 Environmental Sustainability

As compared to the other alternatives, Alternative 5 and Alternative 2 both stand out among other proposals as having highly creative and ambitious environmentally sustainable designs and operational programs (e.g., waste reduction, water conservation, energy conservation, and sustainable building practices). Alternative 5 is further distinguished because its proponents have a proven track record in sustainable design and environmentally friendly building practices (e.g., Skywalker Ranch in Marin County).

5.6 Facilities Considerations

Because Alternative 5 has the fewest buildings, the fewest tenant organizations, and will involve only 12 occupied hours of use per day, it is more advantageous than the other proponent-supported proposals in terms of the demand for facilities services such as refuse, police, fire/rescue, and utility maintenance services. Comparatively, Alternatives 2, 3, and 4, which involve housing and other 24-hour-a-day uses, require increased demands on Presidio utilities, public safety, and communications needs.

5.7 Enhancement for Achieving Presidio Goals (Outreach Plan)

The Alternative 5 proponents also offered a comprehensive outreach and education program that was considered appropriate to the Presidio as a park. Alternative 5 includes an archive of visual effects open to historians and scholars that will enhance the Presidio community by bringing artists, technicians, craftspeople, engineers, researchers and business people to the Presidio. A museum of visual arts and technology that would be open to the public might also be included as an alternative to the archive facility. It includes an Advanced Digital Training Institute that would offer advanced study in computer graphics. An internship program would provide educational opportunities to college students, and the Vision Quest Program would bring local schoolchildren to the site to learn about career opportunities. A public café and coffee bar would serve park

visitors, and the Great Lawn would be a public amenity increasing the open space component of the site. The proponent organizations offered to continue at the Presidio a tradition of community service in part by providing a strong interpretive program using their own innovative technology and techniques to enhance the national park visitor experience.

5.8 Market Impact

In selecting among the alternatives, the Trust considered the potential market impacts of the use of the 23-acre Letterman site on the remainder of the Presidio. The Trust compared each alternative proposal to the real estate already existing at the Presidio in order to identify how each alternative either complements or competes with other Presidio projects. Alternative 5, as compared to other alternatives, offers the greatest opportunity to create synergistic effects with other Presidio leasing efforts. The other three proponent-supported alternatives all have the possibility of having some adverse effect on the leasing efforts for other existing Presidio buildings. Alternative 2 competes with residential, office, and hotel/conference center uses at the Presidio. Alternative 3 competes with office and hotel/conference center uses, and Alternative 4 competes with residential and office uses. By comparison, Alternative 5 supports leasing efforts for other Presidio buildings by providing a tenant base for housing and a market base for retail/service uses, and attracts complementary office users in the areas of arts, education, research, and entertainment.

5.9 Environmental Consequences

In addition to other factors, the Trust has compared the environmental impacts of Alternative 5 against the other alternatives. A concise descriptive summary of these impacts in comparative form is provided in Table 11 of the FEIS. Each alternative has its own unique mix of unavoidable adverse effects, and the Trust recognizes that implementation of Alternative 5 would have unavoidable adverse effects on any unmet housing demand (given the shortage of housing, including affordable housing, in the City of San Francisco), cultural resources (adverse effects on the cultural landscape within the remainder of the 60-acre complex because no infill development would occur in that area), and short-term noise impacts (to occupants and passive recreational users within the 60-acre complex).

The Trust has determined that, when balanced with economic and other considerations, the environmental impacts of Alternative 5 to surrounding users and to the city are acceptable. This determination is made in light of the Trust's plan, presented below, to carry out mitigation measures and to undertake additional Presidio-wide comprehensive implementation planning. Focused implementation planning will ensure that follow-on projects throughout the Presidio are carried out based upon an evaluation of various development options as the implementation of the 23-acre project within the Letterman Complex proceeds.

5.10 Input from Local Community

The weight of public opinion and comment expressing a preference among the alternatives favored Alternative 5 over any of the other action alternatives. Among the reasons given were the possibilities presented by Alternative 5 for building not only a local community of artists but also for becoming a world-wide center for innovative creative expression, interactive entertainment, and global exchange. Public opinion also favored the proponents' site plan and commitment to community service, leadership in arts and education, emphasis on

research and design, and past record of environmental stewardship. In addition, the public favorably noted the site plan with its commitment to the 7-acre Great Lawn as open space park area.

6 Measures to Minimize Potential Adverse Environmental Impacts

All practicable mitigation measures identified in the FEIS to avoid or minimize environmental impacts that could result from implementation of the selected alternative will be incorporated into the project. These mitigation measures are discussed in greater detail in Section 4 and Appendix A of the FEIS. As part of the decision to implement Alternative 5, the Trust is adopting a Monitoring and Enforcement Program (MEP) to monitor actual impacts once the project is begun. The MEP provides for the implementation of the mitigation measures as proposed in the FEIS. The MEP describes the actions that must take place as a part of each measure, the timing of these actions, who is responsible for implementation, and the agency responsible for enforcing each action. It has been formatted as a table, and is appended to this ROD as Attachment 1, with the following information:

- *Impact* – Identified in Table 11 and Appendix A of the FEIS;
- *Mitigation Measures* – Taken directly from Section 4.7 of the FEIS;
- *Reporting Stage and Responsibility* – Applicable milestone or phase and agency/individual who will carry out mitigation measures;
- *Responsibility for Compliance* – Agency/individual who will ensure that the mitigation measures are accomplished;
- *Method of Implementation* – How actions will be implemented;
- *Enforcement* – How implementation of actions will be enforced; and
- *Checkoff* – Verification of implementation.

For most of the measures identified in the MEP, the Presidio Trust has ultimate control over and responsibility for their implementation. Therefore, the Presidio Trust Project Manager for the Letterman Complex is the assigned chief monitor. If ultimate control over the implementation of a specific mitigation resides in another agency, the Project Manager will oversee the implementation of a process to ensure coordination with these other agencies and entities in monitoring and enforcement. The Project Manager will track the overall progress of each action, and will make available to the public the results of relevant monitoring upon request.

7 Public Involvement

Extensive public comment has been requested, considered, and incorporated by the Trust throughout the planning process. The Trust, both on its own and through the GGNRA Citizens Advisory Commission, held fifteen public meetings and workshops in connection with the Letterman Complex. These included two workshops to solicit the public's input regarding appropriate uses for the Letterman Complex prior to the Trust's

receipt of any proposals for the site. In anticipation of the preparation of the DEIS, the Trust held a public meeting to elicit comments regarding the scoping of environmental issues requiring further analysis. The Trust also held a public board meeting and hosted two workshops at which the four short-listed respondents from the RFP presented their detailed proposals. Upon its release, the Trust presented the DEIS to the GGNRA Citizens Advisory Commission and held a public meeting to present an overview of the document. The Trust subsequently held a number of public hearings to receive public comment on the DEIS. After its announcement of a preferred alternative, the Trust extended the public comment period for an additional 45 days. Nearly 1,500 people provided input in public meetings sponsored by the Trust related to the proposed project, and the Trust received more than 300 letters regarding reuse of the Letterman Complex. In addition to the Letterman Complex public meetings and workshops that the Trust hosted, the Trust made presentations at meetings independently sponsored by various neighborhood and community groups, including San Francisco Planning and Urban Research Association (SPUR) and Neighborhood Associations for Presidio Planning (NAPP). Finally, the Trust acceded to requests to delay any actions or a final decision on the Letterman Complex by at least 30 days beyond the 30-day no action period to make additional time available to the public to review the Final EIS.

A more complete description of the history of public involvement throughout the planning process for the 23-acre Letterman project is set forth in Section 5.1 of the FEIS.

8 *Response to Comments on the FEIS*

During the extended review period for the FEIS that ended May 18, 2000, 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. Responses to these comments are provided in Attachment 2 (Report Accompanying the ROD). Minor text changes and factual corrections in response to the comments are provided in Attachment 3 (Errata Sheet).

9 *Conclusion*

In accordance with the provisions of NEPA, the Trust has considered all of the information in the FEIS and the complete record, including all public comments received. All of the above factors and considerations warrant selection of Alternative 5: the Digital Arts Center, identified as the proposed action in the FEIS, as the development proposal for implementation on the 23-acre site within the Letterman Complex at the Presidio of San Francisco. The EPA published a Notice of Availability of the FEIS in the Federal Register on March 17, 2000 (65 FR 14558). A 30-day no action period ended on April 17, 2000, but was extended 30 days by the Trust (see Enclosure 1 to Attachment 2). This decision will become effective immediately.

This final decision will enable the Trust to move forward to implement the selected proposal. Before any onsite demolition or construction activity begins, however, implementation involves a complex preparatory development process which includes: 1) negotiation of a development agreement that establishes conditions to

R E C O R D O F D E C I S I O N

the parties' obligation to enter into a long-term lease agreement and that addresses matters including deconstruction, demolition, abatement of hazardous materials, necessary permits and approvals, and other onsite preparation issues; 2) negotiation of a ground lease that establishes appropriate terms and conditions for the long-term use of the site; 3) performance of preliminary site investigation work such as due diligence investigations for environmental, archeological, and other site-related matters; 4) securing any necessary permits and approvals; 5) soliciting through competitive contracting procedures demolition and construction contractors and negotiation of applicable contract terms; 6) preparing architectural design documents and seeking public and historic preservation agency input.

For further information concerning this decision, contact John Pelka, NEPA Compliance Coordinator, at (415) 561-5300, or at The Presidio Trust, 34 Graham Street, P.O. Box 29052, San Francisco, CA 94129-0052.

Dated: May 24, 2000

APPROVED: _____
James Meadows
Executive Director, Presidio Trust

DATE: _____



ATTACHMENT 1
MONITORING AND ENFORCEMENT PROGRAM

ATTACHMENT 1
MONITORING AND ENFORCEMENT PROGRAM

IMPACT	MITIGATION MEASURE	REPORTING STAGE (RESPONSIBILITY)	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT	CHECKOFF DATE/INITIALS
Geology and Earthquakes						
Impact due to Known and/or Anticipated Geologic/ Seismic Hazards (Mitigated by GE-1)	<p>GE-1. <i>Seismic Hazard Evaluation</i> – Replacement construction shall be allowed to proceed only when the nature and severity of the seismic hazards at the site have been evaluated in a geotechnical report and appropriate structural and design measures have been incorporated into the new construction. A registered civil engineer or certified engineering geologist having competence in the field of seismic hazard evaluation and mitigation shall prepare the geotechnical report. The geotechnical report shall contain site-specific evaluations of the seismic hazard affecting the project, and shall identify any portions of the project site containing seismic hazards. The report shall also identify any known offsite seismic hazards that could adversely affect the site in the event of an earthquake. The contents of the geotechnical report shall include, but not be limited to, the following:</p> <ul style="list-style-type: none"> ■ Project description. ■ A description of the geologic and geotechnical conditions at the site, including an appropriate site location map. ■ Evaluation of site-specific seismic hazards based on geological, geotechnical and soils conditions, in accordance with current standards of practice. ■ Recommendations for appropriate mitigation measures, such as standard structural engineering techniques for foundations and building structural features, that are consistent with established practice and that will reduce seismic risk to acceptable levels. 	Schematic Design Submittal (Letterman Complex Tenant)	Presidio Trust Project Manager in Coordination with Presidio Trust Environmental Remediation Manager	Presidio Trust Compliance Process ¹	Require as Building Permit Condition	

¹ As discussed in the Presidio Trust’s *Presidio Tenant Handbook*.



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	<ul style="list-style-type: none"> ■ Investigation of and integration of soils factors into engineering strengths of existing foundations and structural systems, in accordance with current standards of practice, if existing structures are considered for reuse. ■ Name of report preparer(s), and signature(s) of a certified engineering geologist and/or registered civil engineer having competence in the field of seismic hazard evaluation and mitigation. <p>The Presidio Trust shall independently review the geotechnical report to determine the adequacy of the hazard evaluation and proposed mitigation measures. A certified engineering geologist or registered civil engineer having competence in the field of seismic hazard evaluation and mitigation shall conduct such reviews.</p>					
Water Quality						
Impact on Water Quality within Crissy Field and San Francisco Bay (Mitigated by WQ-1)	<p>WQ-1. <i>Implementation of Best Management Practices</i> – The Letterman Complex tenant shall incorporate structural and operational best management practices (BMPs) and specific design criteria based upon the California Best Management Practices Handbooks into the project design during the preparation of plans and specifications. Structural BMPs shall include improvements to address runoff, existing and proposed parking areas, oil and grease traps in catchbasins, infiltration systems, storm water detention basins, dry wells/cisterns, and biofilters. Operational BMPs to be implemented shall include erosion control; structural maintenance; pipeline maintenance; pavement cleaning; landscape chemical management; stormwater monitoring; education and training; and tenant controls.</p>	Schematic Design Submittal (Letterman Complex Tenant)	Presidio Trust Project Manager in Coordination with Presidio Trust Utility Manager	Presidio Trust Compliance Process	<p>Incorporate into Presidio Trust Water Supply Management Program</p> <p>Require Applicable Measures as Building Permit Conditions</p>	



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Solid Waste						
Impact of Disposal of Demolition Debris Offsite (Mitigated by SW-1)	SW-1. <i>Waste Reduction Goals</i> – The Presidio Trust shall divert at least 50 percent of the waste stream due to demolition within the Letterman Complex from landfill sites by salvage and reuse in order to promote and demonstrate conservation practices in waste reduction and recycling.	During Demolition Phase (Presidio Trust)	Presidio Trust Project Manager in Coordination with Presidio Trust Utility Manager	Presidio Trust Compliance Process	Require as Demolition Permit Condition	
Water Supply and Distribution						
Cumulative Impact of Water Consumption on Available Water (Mitigated by WS-1, WS-2a, WS-2b and WS-3)	WS-1. <i>Fire Flows</i> – The Letterman Complex tenant shall implement one or more of the following actions: fix specific deficiencies in the onsite water distribution system to provide required fire flow (and duration of flow); install onsite hydrants according to the Uniform Fire Code; use sprinkler systems within buildings, and if necessary, use resistive construction.	Schematic Design Submittal (Letterman Complex Tenant)	Presidio Trust Project Manager in Coordination with Presidio Fire Department Inspector	Presidio Trust Compliance Process	Require as Building Permit Condition	
	<p>WS-2a. <i>Water Supply-Side Solutions to Reduce Cumulative Impacts</i> – The Presidio Trust, in cooperation with its tenants, shall implement the following supply-side solutions to mitigate potential shortfalls from the Presidio water supply:²</p> <ul style="list-style-type: none"> ■ Install water meters and develop marginal cost pricing incentives Presidio-wide for use of water beyond projected use allocations (potential water savings: 10,000 gallons per day (gpd)); ■ Install low-flow toilet and shower fixtures, as well as faucet aerators to reduce water consumption during sink use (potential water savings: 20,000 gpd); ■ Optimize irrigation through dawn/dusk water schedules, selection of drought-tolerant plants where appropriate, drip systems, automated irrigation controls, etc. (potential water savings: 80,000 gpd); and 	Schematic Design Submittals (Presidio Trust/Presidio Tenants)	Presidio Trust Project Managers in Coordination with Presidio Trust Utility Manager and Tenants	Presidio Trust Compliance Process and Presidio Trust Water Supply Management Program	Incorporate into Presidio Trust Water Supply Management Program	Require Applicable Measures as Building Permit Conditions

² The numbers for water savings in parentheses are Presidio-wide estimates.



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	<ul style="list-style-type: none"> ■ Provide comprehensive water conservation education to all Presidio tenants and residents (potential water savings: 10,000 gpd). 					
	<p>WS-2b. <i>Water Demand-Side Solutions to Reduce Cumulative Impacts</i> – The Presidio Trust shall implement the following demand-side solution to mitigate potential shortfalls from the Presidio water supply:²</p>	<p>Concurrent with Development of the 23-Acre Site (Presidio Trust)</p>	<p>Presidio Trust Project Manager in Coordination with Presidio Trust Utility Manager</p>	<p>Presidio Trust Water Supply Management Program</p>	<p>Incorporate into Presidio Trust Water Supply Management Program</p>	
	<ul style="list-style-type: none"> ■ Reduce water demand from Lobos Creek by securing an alternate water supply source, such as the use of reclaimed water from the Presidio’s water reclamation system (see mitigation measure WT-1, <i>Water Reclamation Plant to Reduce Cumulative Impacts</i>, below) for Presidio irrigation purposes (potential water savings: 200,000 gpd), purchased water, onsite well water, or by exchange of underground water from other sources (subject to additional environmental analysis and agency review). 					
	<p>WS-3. <i>Instream Flow Monitoring to Reduce Cumulative Impacts</i> – To monitor the need for additional water conservation programs and for securing additional water supply, the Presidio Trust shall establish an instream flow monitoring system capable of communicating real time data directly to the water treatment plant to ensure that Lobos Creek flow levels are consistently maintained.</p>	<p>Concurrent with Development of the 23-Acre Site (Presidio Trust)</p>	<p>Presidio Trust Project Manager in Coordination with Presidio Trust Utility Manager</p>	<p>Presidio Trust Water Supply Management Program</p>	<p>Incorporate into Presidio Trust Water Supply Management Program</p>	

² The numbers for water savings in parenthesis are Presidio-wide estimates.



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Wastewater Treatment and Disposal						
Impact on the City's Wastewater Treatment and Disposal System due to Park-Wide Development (Mitigated by WT-1)	<p>WT-1. <i>Water Reclamation Plant to Reduce Cumulative Impacts</i> – As appropriate or necessary to reduce cumulative impacts, the Presidio Trust shall develop a water reclamation plant capable of reclaiming and treating a minimum of 200,000 gpd of sanitary sewage extracted from the Presidio main sewer line. The reclaimed water shall be made available to supply irrigation water for use in the Presidio and to lower the volume of wastewater discharged to the city's combined sewer system. The water reclamation plant shall comply with the water quality criteria, treatment processes, treatment reliability, monitoring and reporting, and restrictions for use of reclaimed water established by the California Department of Health Services in Title 22, Division 4 (Environmental Health) of the California Administrative Code. These criteria shall be enforced by the California Regional Water Quality Control Board (San Francisco Bay Region) to ensure that the reclamation plant is safe, reliable, and protective of public health. An engineering report prepared by a properly qualified engineer registered in California and experienced in the field of wastewater treatment, and containing a description of the design of the reclamation system shall be filed with the California Regional Water Quality Control Board. The report shall clearly indicate the means for compliance with the environmental health regulations and shall be integrated with environmental analysis and related studies to satisfy NEPA requirements. The report shall also contain a contingency plan to ensure that no untreated or inadequately treated wastewater will be delivered to proposed use areas.</p>	Concurrent with Development of the 23-Acre Site (Presidio Trust)	Presidio Trust Project Manager in Coordination with Presidio Trust Utility Manager	Presidio Trust Water Supply Management Program	Incorporate into Presidio Trust Water Supply Management Program	



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Traffic and Transportation Systems						
Impact of Additional Traffic Volumes on Local Transportation Network (Mitigated by TR-1, TR-2, TR-3, TR-6, TR-7 and TR-8a and b)	<p>TR-1. <i>Lyon Street/Richardson Avenue/Gorgas Avenue Intersection Improvements</i> – Concurrent with the development of the 23-acre site, the Presidio Trust shall coordinate with Caltrans, the City and County of San Francisco (CCSF), and the Letterman Complex tenant to reconfigure the intersection to provide left turns from Richardson Avenue to Gorgas Avenue and left turns from Gorgas Avenue to Richardson Avenue. These improvements shall provide for direct access to and egress from the Letterman Complex via Richardson Avenue prior to reconstruction of Doyle Drive. Preliminary planning for the reconstruction of Doyle Drive indicates that direct vehicular access into the Presidio from Doyle Drive will be provided. Caltrans and the CCSF have initiated preliminary environmental and design efforts for Doyle Drive reconstruction, but selection of a preferred alternative is not expected until the second quarter of 2001. The Presidio Trust shall coordinate with Caltrans, the CCSF and the Letterman Complex tenant to determine the contribution of each party to the cost of the improvements.</p>	Combined Project Study Report/Project Report Submittal (PSR/PR) (Presidio Trust/Caltrans/CCSF)	Presidio Trust Project Manager in Coordination with Presidio Trust Transportation Manager, Caltrans and CCSF	Presidio Trust participation in Caltrans Design and Local Programs Program (DLPP) and Encroachment Permit Process	Presidio Trust’s Negotiation and Execution of Caltrans Cooperative Agreement for Improvements to State Highways	
	<p>TR-2. <i>Lombard Street/Lyon Street Intersection Improvements</i> – Concurrent with the development of the 23-acre site, the capacity of this intersection shall be increased through signalization of the intersection and restriping the one-lane eastbound approach to provide one left-turn lane and one shared right-through lane. The Presidio Trust shall coordinate with the CCSF and the Letterman Complex tenant to determine the contribution of each party to the cost of the improvements.</p>	Concurrent with Development of the 23-Acre Site (Presidio Trust/CCSF)	Presidio Trust Project Manager in Coordination with Presidio Trust Transportation Manager and CCSF	Presidio Trust Participation in CCSF Street-Use/Major Encroachment Permit Process	Presidio Trust Negotiation and Execution of CCSF/Presidio Trust Agreement on Intersection Improvements	
	<p>TR-3. <i>Lombard Street/Presidio Boulevard Intersection Improvements</i> – When needed (i.e., prior to the intersection falling to level of service E or F), the capacity of this intersection shall be increased through widening and restriping the one-lane northbound approach to provide one right-turn lane and one through lane. The Presidio Trust shall coordinate with the Letterman Complex tenant and determine its contribution, if any, to the cost for the improvements.</p>	Prior to Intersection Falling to Level of Service E or F (Presidio Trust)	Presidio Trust Project Manager in Coordination with Presidio Trust Transportation Manager	Presidio Trust Compliance Process	Incorporate into Presidio Trust Transportation Management Program	



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	<p>TR-6. <i>Relocation of the City's Bike Route 4</i> – Prior to implementation of intersection improvements at Lyon Street/Richardson Avenue/Gorgas Avenue, the Presidio Trust shall coordinate with the CCSF to relocate a portion of the city's bike route 4 from Francisco Street between Lyon Street and Broderick Street, to Chestnut Street between Lyon Street and Broderick Street and to Broderick Street between Chestnut Street and Francisco Street.</p>	<p>Prior to Implementation of Intersection Improvements at Lyon Street/Richardson Avenue/Gorgas Avenue (Presidio Trust/CCSF)</p>	<p>Presidio Trust Project Manager in Coordination with Presidio Trust Transportation Manager and CCSF</p>	<p>Revision to Citywide Bicycle Plan</p>	<p>Incorporate into Update of the Transportation Element of the <i>Presidio Trails and Bikeways Master Plan</i></p>	
	<p>TR-7. <i>Adjustment of Bicycle Entry Points near the Lombard Street Gate</i> – Implementation of mitigation measure TR-2, <i>Lombard Street/Lyon Street Intersection Improvements</i> may require adjustment of routes and physical improvements to facilitate access for bicycles entering the Presidio via the city's bike route 4 (relocated to Chestnut Street, see mitigation measure TR-6, <i>Relocation of the City's Bike Route 4</i>) and bike route 6 (Greenwich Street). The <i>Presidio Trails and Bikeways Master Plan</i> (in progress) will consider alternatives to the current access on Lombard Street, to include widening the pedestrian walkway at the Lombard Street Gate, re-establishing the historic opening of the Presidio perimeter wall at Greenwich Street (subject to additional environmental review, including Section 106 compliance), relocating bike route 4 to Gorgas Street, or creating an expanded bicycle and pedestrian path from the Lombard Street Gate.</p>	<p>Submittal of <i>Presidio Trails and Bikeways Master Plan</i> (NPS and Presidio Trust)</p>	<p>Presidio Trust Project Manager in Coordination with Presidio Trust Transportation Manager, NPS and CCSF</p>	<p>Implementation of Mitigation Measures TR-2, <i>Lombard Street/Lyon Street Intersection Improvements</i> and TR-6, <i>Relocation of the City's Bike Route 4</i></p>	<p>Incorporate into <i>Presidio Trails and Bikeways Master Plan</i></p>	
	<p>TR-8a. <i>Presidio-Wide Transportation Demand Management (TDM) Program</i> – The Presidio Trust shall require tenants and occupants to participate in a TDM program for the Presidio. The TDM program shall establish the actions to be taken by the Presidio Trust and all park tenants and occupants to improve transit, pedestrian and bicycle conditions, and reduce automobile usage by all tenants, occupants and visitors, including:</p> <ul style="list-style-type: none"> ■ Carpool/vanpool programs ■ Periodic monitoring of traffic volume and mode choice among Presidio residents and employees 	<p>TDM Program Submittals (Presidio Trust/Presidio Tenants)</p>	<p>Presidio Trust Transportation Manager in Coordination with Tenants</p>	<p>Presidio Trust Compliance Process</p>	<p>Incorporate into Presidio Trust Transportation Management Program</p>	



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	<ul style="list-style-type: none"> ■ Transit and ridesharing information disseminated on kiosks within the park, The Presidio Trust's website, and employee orientation programs ■ Parking management program ■ Secure bicycle parking ■ Mandatory event-specific TDM programs for all special events ■ Onsite sale of transit passes ■ Clean-fuel shuttle bus serving the Letterman Complex and the remainder of the Main Post ■ A transit hub in the Letterman Complex/Main Post area to facilitate transfers between public transit buses and the Presidio shuttle buses ■ Express bus service to regional transit connection programs (i.e., BART and the Transbay Terminal) 					
	<p>All Presidio tenants, including tenants of the 23-acre site within the Letterman Complex, shall be required to participate in the Presidio's TDM program designed to meet performance targets, including a modal split such that at least 30 percent of all employees and visitors travel by transit or non-motorized modes, and vehicle occupancy of at least 1.4 persons per vehicle per auto trip.³ Performance shall be monitored through traffic counts and park-wide user surveys consistent with the TDM program. The Presidio Trust shall work closely with tenants to ensure successful implementation of the TDM programs. An annual report of the Presidio's TDM program and conditions shall be prepared by the Presidio Trust and made available to the public.</p>					

³ Performance targets shall be flexible so that any combination of mode and vehicle occupancy producing the equivalent number of autos will be acceptable. That is, an average vehicle occupancy less than 1.4 persons will be acceptable if a non-auto mode share of greater than 30 percent produced the equivalent number of autos.



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	<p>TR-8b. <i>Letterman Transportation Demand Management (TDM) Program</i> – The Letterman lease shall include provisions requiring the tenant to participate in the TDM program, and the tenant’s Transportation Coordinator shall assist the Presidio Trust’s Transportation Manager to maximize participation in the TDM program. Elements of the TDM program specific to the 23-acre site shall include:</p> <ul style="list-style-type: none"> ■ Onsite Transportation Coordinator ■ Guaranteed-ride-home program ■ Webpage devoted to transportation alternatives ■ Flex-time policies ■ Telecommuting policies ■ Onsite support services ■ Preferential carpool/vanpool parking 	<p>TDM Program Submittal (Letterman Complex Tenant)</p>	<p>Presidio Trust Project Manager in Coordination with Presidio Trust Transportation Manager and Letterman Complex Transportation Coordinator</p>	<p>Presidio Trust Compliance Process</p>	<p>Incorporate into Ground Lease</p>		
<p>Impact of Increased Parking Demand (Mitigated by TR-4 and TR-8)</p>	<p>TR-4. <i>Monitoring of Parking</i> – The overall parking supply and demand shall be monitored periodically to accommodate onsite parking demand, encourage transit use and other non-automobile modes of travel, and discourage parking outside the 23-acre site. This measure shall be implemented through the Parking Management Program that will be developed for the Presidio. This program shall include Presidio-wide parking management and operations strategies to ensure a balance of parking supply and demand, minimizing transportation impacts on the Presidio and surrounding neighborhoods, while encouraging tenants and visitors to use alternative modes. Strategies shall include adoption and monitoring of Transportation Demand Management (TDM) measures (see mitigation measure TR-8, <i>TDM Program</i>), recommending parking regulations in adjacent neighborhoods, and frequent monitoring of parking demand.</p>	<p>Periodically (Presidio Trust)</p>	<p>Presidio Trust Transportation Manager</p>	<p>Adoption and Monitoring of Presidio-Wide TDM Measures</p>	<p>Incorporate into Presidio Trust Parking Management Program</p>		
	<p>TR-8a and b. <i>Transportation Demand Management Program</i></p>	<p>See Impact of Additional Traffic Volumes on Local Transportation Network</p>					



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Impact of Construction Equipment and Vehicles (Mitigated by TR-5)	TR-5. <i>Construction Traffic Management Plan</i> – Prior to construction, a Construction Traffic Management Plan shall be prepared by the contractor(s) and submitted for Trust approval. The plan shall include information on construction traffic scheduling, proposed haul routes, permittee parking, staging area management, visitor safety, and detour routes. As discussed in mitigation measure SW-1, <i>Waste Reduction Goals</i> , the LAMC and LAIR shall be deconstructed and building materials shall be reused to the extent feasible, thus minimizing the transport of demolition debris. The contractor(s) shall limit the transport of demolition debris and construction equipment and materials to periods of off-peak traffic whenever possible. Construction equipment, including trucks, shall be restricted from accessing Lyon Street to minimize additional traffic on the surrounding neighborhood roadways and intersections. Since construction activities associated with the project will likely overlap in some degree with other planned projects in the site vicinity, the contractors for such other projects will be required to coordinate with the development team of the 23-acre site to address vehicle routing, traffic control, and pedestrian movement in the vicinity of the Letterman Complex. Any significant alterations to the Construction Traffic Management Plan shall be subject to written approval by the Presidio Trust prior to implementation.	Construction Traffic Management Plan Submittal Prior to Demolition Phase (Presidio Trust/Letterman Complex Tenant)	Presidio Trust Project Manager in Coordination with Presidio Trust Transportation Manager	Approval of Construction Traffic Management Plan	Require as Conditions for Demolition and Construction Permits	

Cultural Resources

Effect on Historic Setting due to New Construction (Adverse Effect Avoided by CR-1)	CR-1. <i>Planning and Design Guidelines</i> – Under provisions of the NHPA, a Programmatic Agreement (PA) has been developed in consultation with the California State Historic Preservation Officer (SHPO), the Advisory Council on Historic Preservation (ACHP) and the NPS regarding the Deconstruction, New Construction, and the Execution of Associated Leases at the Letterman Complex. Provided for in the PA are significant roles for these entities in the process of developing design guidelines, conceptual design documents and schematic design documents; also provided for in the PA are significant roles for these agencies in the construction monitoring process. In addition, the PA contains opportunity for public input, methodologies for addressing archeological properties, discoveries and unforeseen	Conceptual Design and Schematic Design Review Submittals (Letterman Complex Tenant)	Presidio Trust Project Manager in Consultation with Presidio Trust Compliance Manager, SHPO, ACHP and NPS	Review of Project Documents per the PA	Required Pursuant to the PA	
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	<p>effects, and a requirement of mandatory notification to the Secretary of the Interior and invitation for the Secretary to participate in consultation where there may be an adverse effect on historic properties.</p> <p>The Final Planning Guidelines, which have been publicly reviewed and finalized as part of the EIS, will be merged into the Design Guidelines, which are now under development and have been submitted to the SHPO for review and comment as part of the NHPA’s Section 106 consultation process. The Final Planning and Design Guidelines shall therefore be applied and continue to provide direction through the consultation and design review process under the PA where there will be continuing review of their application by the ACHP, SHPO, NPS, and the public after the environmental review process for this action is concluded.</p> <p>The Planning Guidelines and Design Guidelines for new construction at the Letterman Complex shall be utilized by the Presidio Trust in its review of an undertaking’s effect on the character of the historic district. In addition, incorporation of sustainability provisions within the guidelines shall assist the Presidio in meeting sustainability goals. The criteria in the Planning and Design Guidelines shall guide all replacement construction of buildings (e.g., massing, scale, heights, roof forms, colors, and materials.) The guidelines shall conform to <i>The Secretary of the Interior’s Standards for the Treatment of Historic Properties</i>. New buildings and landscape features shall be designed and sited to be compatible with and enhance the historic setting. Historic buildings shall be rehabilitated in accordance with <i>The Secretary of the Interior’s Standards for the Treatment of Historic Properties</i>, including the <i>Guidelines for Rehabilitating Historic Buildings</i>. In accordance with the PA, copies of the guidelines (as well as public comments received on their content) shall be sent to the SHPO for review.</p> <p>The Planning and Design Guidelines are neither technical nor prescriptive, but are intended to promote new construction that is compatible with the Presidio as a National Landmark District</p>					



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	and, at the same time, to promote design excellence in all new building and landscape work. They are a continuing, interactive set of “guides” which serve as recommendations as the project moves through the design review process, the process of negotiation, the signing of a lease, or the execution of a development agreement. The Trust’s intent is to ensure that the project is compatible with the historic setting, and meets the overall intent of the guidelines while project design and construction conforms to the fullest reasonable extent to the specific direction of Planning and Design Guidelines.					
Visual Resources						
Visual Impacts (Mitigated by VR-1, VR-2, VR-3 and VR-4)	VR-1. <i>Planning and Design Guidelines</i> – The Planning and Design Guidelines shall be applied as set forth in mitigation measure CR-1, <i>Planning and Design Guidelines</i> , during site planning to protect visual resources.	See Mitigation Measure CR-1, <i>Planning and Design Guidelines</i>				
	VR-2. <i>Height of Replacement Construction</i> – The height of replacement construction shall be compatible with nearby structures, with a maximum allowable height not to exceed that of LAIR (60 feet).	Schematic Design Submittal (Letterman Complex Tenant)	Presidio Trust Project Manager in Coordination with Presidio Trust Planning Manager	Presidio Trust Compliance Process	Require as Building Permit Condition	
	VR-3. <i>Maximum Allowable Square Footage</i> – The maximum allowable square footage for replacement construction within the Letterman Complex shall not exceed the existing 1.3 million square feet.	Processing of Trust Actions or Projects Through Project Review	Presidio Trust	Project Review Process ⁴	Interagency Agreement between NPS and Presidio Trust for NEPA Compliance	
	VR-4. <i>Vegetation Screen</i> – The vegetation screen next to the parking area along Lyon Street shall be maintained to the extent feasible and appropriate.	Schematic Design Submittal (Letterman Complex Tenant)	Presidio Trust Project Manager in Coordination with Presidio Trust Planning Manager	Presidio Trust Compliance Process	Require as Building Permit Condition	

⁴ See Golden Gate National Recreation Area Standard Operating Procedures No. 601, *Project Review for NEPA Compliance*.



ATTACHMENT 1
MONITORING AND ENFORCEMENT PROGRAM

IMPACT	MITIGATION MEASURE	REPORTING STAGE (RESPONSIBILITY)	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT	CHECKOFF DATE/INITIALS
Archeological Properties						
Adverse Effect on Archeological Properties (Avoided by AR-1)	AR-1. <i>Archeological Management Assessment and Monitoring Program</i> – The Presidio Trust shall conduct an Archeological Management Assessment (AMA) and Monitoring Program for all undertakings at the Letterman Complex. The Presidio Trust shall conduct an inventory study of known archeological sites in the area of each undertaking including test excavations, as appropriate, to determine if significant sites or historic features are extant and if construction might adversely affect archeological resources. Reports of any investigations shall be submitted to the SHPO and the ACHP. A phased inventory, evaluation, monitoring, and treatment program for archeological resources regarding ongoing maintenance and construction in the complex shall be conducted. The discovery of any human remains or associated mortuary items covered under the Native American Graves Protection and Repatriation Act shall be treated in accordance with 43 CFR 10.4 (Inadvertent discoveries). Consultation and work shall be conducted in accordance with the Programmatic Agreement (Appendix F to the FEIS).	Prior to Design Development and Construction Document Submittals (Presidio Trust)	Presidio Trust Project Manager in Coordination with Presidio Trust Historical Archeologist, SHPO, ACHP and NPS	Review of AMA under the PA	Require as Excavation Clearance Condition Pursuant to the PA	
Native Plant Communities						
Beneficial Impact on Native Plant Communities (Maximized by NP-1)	NP-1. <i>Landscaping Plan</i> – A detailed landscaping plan shall be prepared and approved as part of the design review process. The landscaping plan shall be prepared in consultation with Presidio Trust staff and in accordance with the goals and objectives of the <i>Vegetation Management Plan</i> . Planning shall take into account opportunities for native habitat enhancement where feasible and appropriate.	Schematic Design Submittal (Letterman Complex Tenant)	Presidio Trust Project Manager in Coordination with Presidio Trust Planning Manager	Presidio Trust Compliance Process	Require as Building Permit Condition	



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IMPACT	MITIGATION MEASURE	REPORTING STAGE (RESPONSIBILITY)	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT	CHECKOFF DATE/INITIALS
Wildlife						
Control of Visitor Use and Protection and/or Expansion of Native Wildlife Habitat (Mitigated by WL-1, WL-2, WL-3 and WL-4)	WL-1. <i>Ornamental and Native Stand Protection</i> – Management treatments and practices described in the <i>Natural Resource Inventory and Vegetation Management Options</i> (NPS 1997a) shall be taken to protect the most valuable wildlife habitat within the 23-acre site. These habitat areas shall include the palms, the coast live oaks in the existing open space, the redwood, and the Monterey pines and eucalyptus within the historic windrows. Measures shall include restricting the size of work areas, avoiding work when soils are wet and compaction-prone, and carefully training work crews to reduce potential impacts on vegetation.	Schematic Plan Submittal (Letterman Complex Tenant)	Presidio Trust Project Manager in Coordination with Presidio Trust Planning Manager	Presidio Trust Compliance Process	Require as Building Permit Condition	
	WL-2. <i>Raptor Nests</i> – Prior to any demolition or construction activities, a qualified biologist shall determine whether any birds of prey are nesting in the vicinity and whether they might be impacted by development. Observations shall be made during the nesting season (March 15 through August 15) prior to and during construction activities. If nesting pairs are located in the work vicinity, appropriate buffer zones shall be delineated and the area closed by installation of temporary fencing until it has been determined that nesting activity has ended. Other preventive measures, such as the use of signing, implementation of a monitoring program, and establishment of contingency plans shall also be implemented as necessary to avoid accidental habitat degradation during the construction phase.	During Construction Phase (Presidio Trust/Letterman Complex Tenant)	Presidio Trust Project Manager in Coordination with Presidio Trust Construction Manager	Presidio Trust Compliance Process	Require as Demolition and Building Permits Conditions	
	WL-3. <i>Nesting Birds</i> – Any removal (including mowing and tree-trimming) of landscaped, non-native or native vegetation shall follow park guidelines for protection of nesting birds. These guidelines include restrictions on timing of vegetation removal, requirements for searching for active nests prior to removal, and maintaining mowed areas at low height to discourage nesting. Restriction of work areas and education of work crews will also reduce possible wildlife impacts.	During Construction and Operation Phases (Presidio Trust/Letterman Complex Tenant)	Presidio Trust Project Manager in Coordination with Presidio Trust Construction Manager	Presidio Trust Compliance Process	Require as Demolition and Building Permits Conditions	



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	WL-4. <i>Integrated Pest Management</i> – All tenants shall be educated and shall implement the integrated pest management options for managing the major pests found at the Presidio as identified in the <i>Integrated Pest Management Information Manual for the Presidio</i> . Visitors shall have signs and information regarding the importance of litter control, not feeding wildlife and pest management issues.	During Operations Phase (Presidio Trust/Presidio Tenants)	Presidio Trust Project Manager in Coordination with Presidio Trust Natural Resources Specialist	Presidio Trust Provision of Integrated Pest Management Manual to Tenants through Leasing Program	Incorporate into Ground Leases	

Topography and Soils

Soil Disturbance during Pavement Removal, Intersection Improvements, Landscape Rehabilitation and Building Demolition (Mitigated by TS-1)	TS-1. <i>Storm Water Pollution Prevention Plan (SWPPP)</i> – As directed by the Clean Water Act and other applicable requirements, a Notice of Intent shall be filed with the State Water Resources Control Board (SWRCB) prior to initiation of soil-disturbing activities to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (General Permit). The General Permit requires development, implementation, and compliance monitoring of a SWPPP that prescribes BMPs including structural, management and vegetation measures, to control erosion and contaminated runoff from the construction site. The inclusion of an analysis of potential downstream impacts on receiving waterways due to the permitted construction may be required. The Presidio Trust shall minimize the discharge of soil and pollutants during excavation by requiring contractors to employ measures to contain disturbances within localized areas, including use of turbidity barriers, silt curtains, or equivalent measures as feasible and appropriate. Prescriptions for monitoring and reporting of BMP performance and conditions before and immediately after the completion of work shall be conducted pursuant to the General Permit. Compliance with the BMPs included in the SWPPP will result in a minimal amount of soil erosion, and discharges of construction-related pollutants will be minimized.	Schematic Plan Review Submittal prior to Initiation of Soil Disturbing Activities (Presidio Trust/Letterman Complex Tenant)	Presidio Trust Project Manager in Coordination with Presidio Trust Utilities Manager and SWRCB	Presidio Trust Compliance Process and SWRCB General Permit Process	Require as Demolition and Building Permit Conditions	
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IMPACT	MITIGATION MEASURE	REPORTING STAGE (RESPONSIBILITY)	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT	CHECKOFF DATE/INITIALS
Air Quality						
Short-Term Demolition/ Construction Impacts (Mitigated by AQ-1 and AQ-2)	AQ-1. <i>Bay Area Air Quality Management District (BAAQMD) Control Measures</i> – To reduce demolition- and construction-generated particulate matter (PM ₁₀) emissions, construction contractors shall implement as feasible and appropriate the BAAQMD’s recommended control measures for emissions of dust during demolition and construction: 1) water all active construction areas at least twice daily; 2) cover all trucks hauling soil, sand, and other loose materials or require trucks to maintain at least 2 feet of freeboard; 3) pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas and staging areas; 4) sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas; and 5) sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets.	During Demolition and Construction Phases (Presidio Trust/Letterman Complex Tenant)	Presidio Trust Project Manager in Coordination with Presidio Trust Construction Manager	Presidio Trust Compliance Process	Require as Demolition and Building Permit Conditions	
	AQ-2. <i>Demolition of Existing Buildings</i> – To the extent feasible and appropriate, the Presidio Trust shall apply an environmentally effective approach, including a combination of deconstruction and demolition techniques, to remove outdated structures and reduce PM ₁₀ emissions from demolition activities.	During Demolition Phase (Presidio Trust)	Presidio Trust Project Manager in Coordination with Presidio Trust Construction Manager	Presidio Trust Compliance Process	Require as Demolition Permit Condition	
Long-Term Regional Operation Impacts (Mitigated by AQ-3)	AQ-3. <i>Traffic and Transportation Measures</i> – All measures listed in the Traffic and Transportation section shall be implemented to the extent feasible to encourage alternatives to automobile use, contribute to improvement of air quality and lower carbon dioxide emissions.	See Impact of Additional Traffic Volumes on Local Transportation Network (Mitigation Measures TR-1, TR-2, TR-3, TR-6, TR-7 and TR-8a and b)				



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Noise						
Short-Term Impact due to Demolition and Construction Activities (Mitigated by NO-1)	NO-1. <i>Reduction of Construction Noise</i> – During demolition and construction, contractors and other equipment operators shall comply with the terms of provisions equivalent to the standards in the San Francisco Noise Ordinance. Noise-generating construction activities associated with new development shall not occur during times of the day in which such construction activities are prohibited under the San Francisco Noise Ordinance. Impact tools shall be equipped with intake and exhaust mufflers, and commencement of any explosive or implosive activities shall be coordinated with appropriate approvals and notifications from the Presidio Trust. To reduce noise impacts on visitors, construction sites will be temporarily off-limits to visitors. To further reduce noise impacts, where feasible, appropriate barriers shall be placed at a distance of 250 feet between sensitive receptors and construction sites and stationary equipment such as compressors and crushers. This will reduce noise by as much as 5 A-weighted decibels (dBA).	During Demolition and Construction Phases (Presidio Trust/Letterman Complex Tenant)	Presidio Trust Project Manager in Coordination with Presidio Trust Construction Manager	Presidio Trust Compliance Process	Require as Conditions for Demolition and Building Construction Permits	
Human Health, Safety and the Environment						
Potential for Identified and Unidentified Contamination (Mitigated by HH-1, HH-2 and HH-3)	HH-1. <i>Asbestos Remediation</i> – Prior to initiating building demolition within the Letterman Complex, the Presidio Trust shall identify all asbestos-containing materials and assess, document, and monitor their condition. The party conducting the building demolition shall comply with all applicable asbestos regulations. Workers shall use all necessary personal protective clothing and respiratory equipment during removal. During removal, all safety measures shall be followed to prevent any contamination outside the removal area. Air purification and air monitoring equipment shall be in operation during removal in interior areas. Air sampling shall be conducted during removal. Encapsulation shall be done using approved sealants. All waste asbestos shall be placed in approved and labeled double 6-millimeter plastic bags or approved, labeled Department of Transportation (DOT) drums. Waste asbestos shall be properly transported under strict adherence to U.S. Environmental Protection Agency/Resource Conservation Recovery Act	Prior to Demolition (Presidio Trust)	Presidio Trust Project Manager in Coordination with Presidio Trust Environmental Remediation Manager	Presidio Trust Compliance Process	Require as Demolition Permit Condition	



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	(EPA/RCRA), state and local regulations by a licensed hazardous waste hauler to an approved waste site. All necessary shipping documents shall be prepared prior to any shipments.					
	HH-2. <i>Lead-Based Paint Abatement</i> – Prior to initiating building demolition within the Letterman Complex, the Presidio Trust shall prepare a management and remediation plan for lead-based paint to reduce impacts of lead-based paint contamination to acceptable levels. All workers involved in lead abatement shall follow required procedures to protect themselves and family members from exposure. Warning signs shall be posted to mark the boundaries of lead-contaminated work areas. These signs will warn about the lead hazard, prohibit eating, drinking and smoking in the area, and specify any protective equipment required. Workers shall use all necessary personal protective clothing and respiratory equipment during removal. During removal, all safety measures shall be followed to prevent any contamination outside the removal area. Air purification and air monitoring equipment shall be in operation during removal in interior areas. All waste lead-contaminated materials shall be placed in approved, labeled waste collection receptacles. Waste lead shall be properly transported under strict adherence to EPA/RCRA, DOT, and state and local regulations by a licensed hazardous waste hauler to an approved waste site. All necessary shipping documents shall be prepared prior to any shipments.	Prior to Demolition (Presidio Trust)	Presidio Trust Project Manager in Coordination with Presidio Trust Environmental Remediation Manager	Presidio Trust Compliance Process	Require as Demolition Permit Condition	
	HH-3. <i>Contingency Plan</i> – Prior to initiating subsurface construction within the Letterman Complex, a Contingency Plan shall be developed to provide a decision framework for the Presidio Trust to address the potential for unidentified contamination discovered during construction activities. The plan will allow the Presidio Trust and its contractors to manage identified contaminants in a timely manner that is protective of human health and the environment. The Plan shall provide a discussion of the project, applicable regulatory requirements for the contingency activities, appropriate cleanup levels, notification/coordination requirements and plan approval process. The Presidio Trust shall coordinate with the applicable regulatory agencies to obtain their concurrence regarding the	Contingency Plan Submittal Prior to Construction Phase (Presidio Trust)	Presidio Trust Environmental Remediation Manager	Presidio Trust Compliance Process	Require as Construction Permit Condition	



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	proposed approach to and during development of the plan. Additionally, the Presidio Trust shall coordinate with the Presidio Restoration Advisory Board.					
Energy Consumption						
Impact on Energy Consumption (Mitigated by EC-1)	EC-1. <i>Conservation Measures</i> – In accordance with the energy requirements of Executive Orders 11912 and 12003, the Letterman Complex tenant shall develop specific measures to minimize building energy use for each building to be constructed.	Schematic Design, Design Development and Construction Document Submittals (Letterman Complex Tenant)	Presidio Trust Project Manager in Coordination with Presidio Trust Energy Manager	Presidio Trust Compliance Process	Require as Building Permit Condition	



ATTACHMENT 2
REPORT ACCOMPANYING THE
RECORD OF DECISION

This report has been prepared to further inform the Presidio Trust (Trust) decision-makers as they prepare to select a development alternative for implementation on the 23-acre site within the Letterman Complex. In April 1999, the Trust released for public comment the *Draft Environmental Impact Statement and Planning Guidelines for New Development and Uses on 23 Acres within the Letterman Complex* (DEIS). Based upon public comments received, the Trust made changes to the DEIS, and in March 2000 released the Final Environmental Impact Statement (FEIS) for the Letterman 23-acre project. The Trust responded to all comments received on the DEIS, and those responses are found in the Responses to Comments volume of the FEIS.

1 Extended Review Period for FEIS

Following release of the FEIS, a number of reviewers sought additional time to review the information in the FEIS and requested the Trust to extend the review period beyond the 30-day minimum required by the National Environmental Policy Act (NEPA) regulations¹ (40 C.F.R. 1506.10(b)(2)). In response, the Trust notified all reviewers that the Presidio Trust Board of Directors did not plan to take any final action or make a final decision prior to its regularly scheduled Board meeting on May 18, 2000. The practical effect of this notice was to extend the NEPA 30-day “no-action” period by another 30 days (from April 17 to May 17, 2000). The Trust further explained in its extension notice that, although the “no-action” period is not a formal comment period, all comments received during the 60-day review period would be considered by the Trust and made a part of the decision record. The Trust’s notice is appended as Enclosure 1 to this report.

2 FEIS Comment Letters

Additional comment letters on the FEIS have been received. Although these letters raise no new issues requiring modification of the proposed action or the planned decision process, the Trust has prepared this report to respond to those comments received during the NEPA “no-action” period in order to better inform the selection decision of the Trust Board of Directors. This report summarizes the additional public comment received during the extended review period for the FEIS, and responds to or clarifies the issues raised, as appropriate.

The Trust received comment letters raising specific concerns from the organizations and entities listed below. The Trust’s responses to the points raised are also presented below.

2.1 U.S. Environmental Protection Agency (EPA)

EPA Headquarters in Washington D.C. comments on its website (<http://es.epa.gov/oeca/ofa/comsum.html>) on all FEISs published in the United States. With regard to the Letterman FEIS, EPA’s comments were limited to

¹ The following organizations and individuals submitted written requests for additional time to review the FEIS: Resourceful Women, Pacific Foundation Services LLC, Diamond Heights Community Association, Potrero Boosters Neighborhood Association, North of Panhandle Neighborhood Association, Greater West Portal Neighborhood Association, Coalition for San Francisco Neighborhoods, Telegraph Hill Dwellers, Rudolph Steiner Foundation and Mr. Donald S. Green.



stating that “no formal comment letter was sent to the preparing agency” (<http://es.epa.gov/oeca/ofa/may1200c.html>). In addition, representatives of EPA Region IX, with whom Trust staff have maintained contact throughout this EIS process, noted that additions to the DEIS and responses by the Presidio Trust adequately addressed issues raised by Region IX in their letter to the Trust (see letter 62 in the Responses to Comments volume of the FEIS). Region IX staff stated they have no formal objections to the proposed project, and will work with the Trust to address concerns related to comprehensive development plans for the Presidio.²

2.2 As You Sow, Golden Gate Audubon Society, National Parks Conservation Association, Natural Resources Defense Council, San Francisco League of Conservation Voters, San Francisco Tomorrow, San Francisco Tree Council, Sierra Club, and the Wilderness Society (AYS)

The Trust received a March 30, 2000, comment letter from AYS that noted many of the same issues raised in the group’s earlier comments that were responded to by the Trust in the Responses to Comments volume of the FEIS. AYS’s March 30 letter also stated:

At the outset . . . we want to stress how appreciative the commenting groups are of the approach taken by the Trust in this final EIS. . . . None of the many meetings representatives of our groups have had with the Trust staff or even Board members over the past seven months prepared us for the release of a document in which a serious attempt would be made to respond to our concerns. Rather, all of our interactions led us to believe that the final EIS would be as flawed as the draft was

The Trust, however, has published a very different document – one that in fact suggests that it is prepared to change the way it has been doing business. . . . we are hopeful that the playing field has shifted dramatically and that this shift will be confirmed by the Trust’s response (page 1).

The Trust’s response, dated April 11, 2000, to AYS’ letter is appended as Enclosure 2 to this report. The following is offered in addition to the Trust’s April 11 letter so as to be fully responsive to the reviewers’ concerns:

Alternative Levels of Development for 23-Acre Site – AYS continues to criticize the range of alternatives as inadequate for not having looked at alternative levels of development for the 23-acre site. A complete response to this comment has been provided in the expanded discussion of purpose and need for the project in Section 1 of the FEIS and in master responses 6A (Adequacy of Scope of Alternatives) and 1D (NEPA and Tiering from the General Management Plan Amendment (GMPA) EIS). AYS discounts this detailed response, claiming that the decision to focus on 900,000 square feet of development was never subjected to NEPA review. It has, in fact, been properly reviewed under NEPA through this Supplemental EIS process. Moreover, AYS admonishes that “it is NEPA, not the marketplace, that determines the adequacy of the range of alternatives considered in an EIS” (page 7 of AYS letter). AYS’s comment oversimplifies NEPA. Under NEPA, a project’s purpose and

² See electronic mail correspondence dated May 16, 2000 from Leonidas Payne, Attorney – NEPA Review, EPA Region IX to John Pelka, NEPA Compliance Coordinator, Presidio Trust.



need defines the reasonable range of feasible alternatives. Central to this project's purpose and need is the achievement of a projected measure of market-based financial self-sufficiency. Under these circumstances, NEPA allows the marketplace to help delineate what alternatives are reasonable (Midcoast Interstate Transmission Inc. v. FERC, 198 F.3d 960 (D.C. Cir. 2000) (application dismissed because alternative "had no contracts or other evidence of market support for the project"))).

With respect to the square footage decision, the Trust had a number of compelling reasons for focusing its market-based solicitation on a 900,000-square-foot development:

First, concentrating 900,000 square feet of building space on 23 acres reflects the site's history of intensive use. The area immediately surrounding and within the 23-acre site is one of the only sites on the Presidio that historically has been subjected to intensive development because of its proximity to the urban area and amenities outside the Presidio boundary. Since the late 1890s, when the first Letterman Army Hospital was built, the 23 acres have been used intensively, first as a corridor to the adjacent city of San Francisco neighborhoods, later as a part of the Panama Pacific International Exposition, and finally as one of the busiest military hospitals in the country until the post-war era, when it became a regional medical center serving the surrounding military community (see FEIS Section 1.1.5). Therefore, the area immediately surrounding and within the 23-acre site has had a history of intensive use.

Second, the National Park Service (NPS) envisioned perpetuating the site as a building and activity core. Under interim legislative authority prior to creation of the Trust, NPS carried this approximate footprint through to its 1994 RFQ for the Letterman Complex. The NPS Request for Qualifications (RFQ) assumed retention and reuse of Letterman Army Institute of Research (LAIR) and allowed for new replacement construction predominantly, although not entirely, within the 23-acre site to replace Letterman Army Medical Center (LAMC). Had NPS concluded a lease with the University of California at San Francisco (UCSF) as proposed in the RFQ, it would have involved occupancy by a single large anchor tenant largely within the 23-acre site, an intensity of use roughly comparable to the Army's pre-existing use on the 23-acre site and to the project proposed by the Trust.

Third, there were and are good reasons to concentrate development density in areas where it has been historically concentrated. The site is unique in its access to transit service and urban amenities. It is easily accessible from downtown San Francisco, surrounding residential neighborhoods, and commercial districts, with access via Richardson Avenue to the Golden Gate Bridge. Restaurants, stores, and other commercial establishments are nearby, outside the park entrance. The site is also served directly by public transit connections to downtown San Francisco and regional destinations. All of these amenities are appropriate qualities for a site with concentrated development.



Fourth, development of this size is needed to yield sufficient income to the Trust to meet the FMP's forecasted revenue for the Letterman Complex.³ Market analyses showed that a development of 900,000 square feet was needed to yield revenues sufficient to make the financial investment badly needed to address building and infrastructure improvements throughout the Presidio. Alternatives that were much smaller were not solicited for development by the Trust because they could not generate sufficient revenue to meet early capital investment needs for the Presidio and because the economics of land development made a smaller project financially unattractive, given the need for the potential tenant to pay the fixed costs associated with redevelopment. The economics of land development are not directly proportional. Many of the costs of development are fixed for any amount of development (for example, demolition of the existing buildings and certain infrastructure development or improvements). If the proposed project were reduced in scale, with no change in quality of construction and open space improvements, the land rent would reduce by more than a proportionate reduction in the scale of development. For example, a reduction to 700,000 square feet would result in a \$2- to 3-million annual revenue shortfall. (See master responses 10A and 10B in the Responses to Comments volume of the FEIS for further explanation.)

Fifth, while the GMPA presented a theoretically desirable site plan, a number of practical marketing considerations warranted consolidating density. Based upon real estate marketing concepts, the Trust determined that revenue-generating potential could be severely constrained unless development was contained within a site that could be easily marketed and managed. In addition, marketability could be improved by focusing infrastructure improvements in a limited area and by focusing on a contiguous site that would not otherwise be broken up by roadways or other buildings. Also, focusing the development on a limited parcel would make the offer more economically attractive to a larger universe of potential submitters and would increase the likelihood of receiving viable development proposals from a single master tenant. Dealing with a single master tenant could significantly simplify the lease negotiation process as compared to disbursing development through the 60-acre complex, which would likely have involved creating separate leases for multiple parcels.

These marketing considerations were factored together with the GMPA's severe limitation on the amount and location of new construction at other Presidio sites. The 23-acre site, an area of the Presidio that is already built out, is by far the largest among the limited number of sites identified in the GMPA for potential new construction. No other parcel at the Presidio could accommodate as large a development offering under the constraints of the GMPA.

Related to this consideration was the absence of historic buildings on the 23-acre site. In general, newly constructed buildings command higher rental rates than do rehabilitated historic buildings. Unlike the remainder of the 60-acre complex, the 23-acre site did not contain historic buildings, which add complexity and

³ AYS claims that the Trust was required to subject its FMP forecast for how it planned to achieve a declining budget appropriation to NEPA review. Congress directed the Trust to submit the FMP within one year after the first meeting of the Board of Directors to offer a declining appropriations plan. Impact statements are not required on appropriation proposals, and therefore the FMP itself is not subject to the NEPA mandate (Andrus v. Sierra Club, 442 U.S. 347 (1979)). The exemption of budgetary proposals from the impact statement requirement does not, however, exempt the Trust from preparation of an impact statement on actions taken in response to the appropriation decisions as the Trust has done here with the Letterman Complex EIS.



higher project costs, bringing down the revenue generation potential of a development offer. Thus, given the number of historic buildings elsewhere within the Letterman Complex and at built-out areas of the Presidio other than this 23-acre site, there are limited opportunities for new construction on the Presidio at a scale that could satisfy the Financial Management Program (FMP) financial parameters for the Letterman Complex. This previously developed site, which already had over 800,000 square feet of existing but outdated non-historic building space, presented a singular opportunity to offer a contiguous parcel for new development, a rarity in San Francisco. Furthermore, because of the mandate to preserve and reuse the many historic buildings, few, if any, other opportunities exist for a project of this type that is capable of generating the needed revenue. Where the GMPA severely limited the amount and location of new construction at other Presidio sites, at this site alone the Trust could propose development of a sufficient size with capacity to generate the revenues needed to fund the maintenance and rehabilitation of badly deteriorating buildings and infrastructure at the remainder of the Presidio.

Lastly, the GMPA proposes a scale of development for the Letterman Complex to which this project adheres. This size development does not represent significant new construction over and above that which already exists at the 23-acre site. Rather, it is replacement construction that generally reflects the existing development footprint of LAMC and LAIR. The GMPA itself contemplated development within the Letterman Complex on the scale proposed here by the Trust, albeit under a different site plan (i.e., retention of LAIR and a portion of the new construction would be infill construction across the 60 acres). To the extent the proposed layout of the development has departed from the GMPA, that departure has been fully analyzed under this FEIS.

For all these reasons, the Trust considered it rational to focus its solicitation on 900,000 square feet of new replacement development within the Letterman Complex.

Conformity of Proposal to GMPA's Square Footage Limitation – AYS commentors claim that the inclusion of underground parking space as an aspect of the proposed action results in the project impermissibly exceeding the 1.3-million-square-foot building space limit provided under the GMPA for the Letterman Complex. This comment was first raised in the DEIS. The commentors asked why underground parking areas are not included as part of the building area calculation. With regard to the square footage allocated to parking, text has been added to Section 2, Alternatives, to identify the proposed square footage of structured parking under each alternative. Square footage for structured parking, as defined in the Building Owners and Managers Association International's *Standard Method for Measuring Floor Area in Office Buildings [BOMA Standards]*, is not considered rentable square footage and therefore was not calculated into the proposed replacement construction figures. This is consistent with current industry practice, in which underground parking is not calculated into the gross floor area of new construction, as demonstrated in the San Francisco Planning Code, Sections 102.9 and 204.5. Rather, parking requirements are directly related to building square footage and use category. Likewise, square footage for surface parking was also not calculated into new construction square footage totals (see master response 11, Derivation of Proposed Building Area, in the Responses to Comments volume of the FEIS).



AYS commentators now claim that the Trust's approach is flawed because the GMPA included all underground space in its 1.3-million-square-foot total for the Letterman Complex, and therefore the Trust cannot look to BOMA standards. AYS is mistaken. The GMPA only included a small subset of habitable or useable underground space in its square footage totals. The initial building inventory conducted for the Presidio in support of the GMPA planning efforts was largely based upon the existing inventory on file in the Army records, supplemented by a limited condition assessment inventory. The reference manual, methodology, and conclusions for this inventory (*Building Inventory Summary Report*, April 1992, Architectural Resources Group) is part of the decision record and can be found in the Park Archives as well as the Presidio Trust Library. Selected buildings' exteriors were spot-checked for measurements in the field and gross square footages from the Army's data were entered. As part of this inventory, only gross square footage of finished basements were included.

When this survey was conducted, there were (and still are) no underground parking garages that would have been included in the inventory. Some standing garages that had been converted to storage use, adjacent to residential areas, were included in the overall inventory because they are standing structures with four walls and a roof and are considered habitable space for uses other than parking automobiles. Uninhabitable underground space was not. External, surface lot parking (the dominant form of parking found at the Presidio) was documented in the parking inventory completed as part of the transportation technical analysis for the GMPA; it was also not included in the building inventory.

Because no underground parking structure existed at the Presidio at the time of this inventory, there was no precedent for including underground parking in the total gross square footage calculations for the Presidio. Therefore, for the Letterman EIS, the Presidio Trust looked to other outside standards related to the issue and determined to rely upon both the Building Owners' and Managers Association International's Standard Method for Measuring Floor Area in Office Buildings, as well as the City of San Francisco's Planning Code. The SF Planning Code (Section 102.9) "excludes floor space used for accessory off-street parking and loading spaces . . ." These two existing standards provided a rational and reasonable methodology to calculate the square footage of the development project, and also supported the GMPA's approach of generally excluding uninhabitable underground space when calculating the size of the proposed development.

Alternative Levels of Development for the Park – The AYS commentators also would have liked the Trust to analyze alternative levels of development for the Presidio as a whole. A comprehensive plan for the Presidio already exists in the GMPA. The GMPA comprehensively addresses a plan for 13 major planning areas at the Presidio and other resource management plans, including natural areas, visitor services, transportation, and sustainability. The need for a certain site-specific modification was necessitated at the point that UCSF and other medical research users withdrew as potential tenants, making the project envisioned by the GMPA at the Letterman Complex infeasible. Given the infeasibility of the UCSF option, the Trust sought in its RFQ and subsequent actions to solicit proposals comparable in size, stature, and location to UCSF's while seeking simultaneously to fulfill the Trust Act's self-sufficiency requirement.



For purposes of this Letterman Complex project and this EIS, the Trust did not need to look at alternative levels of development across the Presidio because, as stated above, the GMPA had generally set the level of development for this planning area and the Trust is adhering to it. Under the GMPA, the Letterman Complex has been considered and analyzed among all of the proposed developments within the Presidio, and through the Supplemental EIS the effects of any changes to the plan as contemplated in the GMPA have been analyzed.

Given the Trust's reliance on the GMPA as the foundational planning document, NEPA does not require the Trust to have looked at alternative levels of development for the Park as a whole in this Supplemental EIS. Nevertheless, these reviewers and others have expressed desire for the Trust to better explain how it intends to implement the GMPA Presidio-wide in view of the need under some circumstances, as here, to depart from the site-specific proposals of the GMPA in certain respects. The Trust, therefore, has committed to a planning effort that will encompass all of Area B of the Presidio under the Trust's administrative jurisdiction. This planning will take into account intervening events that have altered the GMPA's site-specific assumptions, changed circumstances and new opportunities that have arisen since the 1994 GMPA was finalized, and new Trust mandates. The Trust expects the product of the planning effort to be an update of the 1994 GMPA for Area B of the Presidio with an associated supplemental environmental impact statement to the 1994 GMPA EIS. The Trust anticipates their formal scoping will begin in July 2000. And, directly relevant to the reviewers' concern raised here, this comprehensive planning effort will look at a range of development alternatives throughout Area B.

Enforcement of Historic Compliance Guidelines – The AYS commentors continue to raise concerns that the planning and design guidelines will not be strictly enforced, and therefore they cannot be relied upon to mitigate or prevent impacts. This view reflects a continuing misunderstanding of the guidelines, their development, and their intended application. The Programmatic Agreement (PA) for the Letterman Complex, which was under negotiation throughout the EIS process, is now final. It is attached to the FEIS as Appendix F. The PA is the tool to ensure that the selected development alternative satisfies historic compliance guidelines. The PA and the compliance process it specifies have been adopted as a mitigation measure to ensure historic compliance.

Under the PA, the Final Planning Guidelines published in the FEIS will be incorporated into final overall design guidelines for the Letterman Complex (Final Guidelines) and will therefore be applied and continue to provide direction through the PA's consultation and design review process. Under the agreement, the Trust "will ensure that all . . . documents . . . developed for new construction within the Letterman Complex . . . conform to the fullest reasonable extent to the Final Guidelines" developed under the PA (Programmatic Agreement at Section V.A). To the extent the adverse effects on cultural resources that have been identified in Section 4.5.12 of the FEIS can later be mitigated through the implementation of the Final Guidelines under the PA, the Trust will do so. Through this process, the Trust will ensure that selected development plans, at each stage of development, comply with sections 106 and 110 of the NHPA. Through this process under the PA, review of the application of the Final Guidelines by the Advisory Commission on Historic Preservation (ACHP), State Historic Preservation Officer (SHPO), NPS, and the public will continue after the environmental review process for this action is concluded and will ensure compliance with historic preservation obligations.



It is important to bear in mind that the NEPA process does not terminate with the finalization of an EIS and the execution of a Record of Decision. Unlike the Council on Environmental Quality (CEQ)'s predecessor "guidelines," which were confined to §102(2)(c) of NEPA, the EIS provision (40 C.F.R. §1500.3) and the current CEQ NEPA Regulations apply to the whole of §102(2), the action-forcing provisions of the Act. The NEPA process starts with "early planning," (§§1501.1, 1502.2), goes through a possible Environmental Assessment stage (§1501.3), to the EIS (if that proves warranted, §§1501.4, 1502.3, 1502.9), to a Record of Decision (§1505.2) and to "implementing the decision," which may include monitoring, mitigation, and reports on progress in carrying out such mitigation (§ 1502.3). The Planning and Design Guidelines are, like the Monitoring and Enforcement Program (MEP, Attachment 1), very much part of this ongoing NEPA process (§1508.21).

Planning Guidelines Have Been Changed without Explanation – AYS comments that the Planning Guidelines have been changed without explanation. Changes made to the guidelines between the draft and final version were made primarily to clarify meaning, correct errors, use uniform language, and provide focus on the 23-acre site. For example, diagrams were changed substantially to omit references to infill construction in the historic hospital complex or that would impinge on the Tennessee Hollow riparian corridor, since such infill construction would not occur under Alternatives 2 through 6. The change to Guideline B-16, the O'Reilly commons, is not a weakening of the guidelines but rather a change in thinking about the purpose of the commons based upon evaluation of how the alternative proposals developed central open spaces elsewhere on the site. The O'Reilly commons diagram changed (i.e., the draft established an optimum size while the final diagram focuses instead on setting a minimum standard) and new language was added clarifying its measurement.

Information on Trees – AYS commentators are correct in asserting that the FEIS contains new information about the trees on the site.⁴ In response to a comment on the DEIS by the San Francisco Tree Council, a tree survey under the direction of the Trust was performed to quantify the removal of up to 317 of the 408 non-native mature trees on the site. The effect of this removal was previously identified on page A-13 in the DEIS ("the removal of non-native trees at the site would decrease the number of trees available for nesting birds"). The analysis in the DEIS determined that non-native tree removal would not be a significant impact because the most valuable wildlife habitat onsite would be protected (see mitigation measure WL-1, *Ornamental and Native Plant Protection*), and that restored native and non-native plant areas would provide new habitat for nesting birds. This new information was provided in the FEIS for full disclosure and suggested no new conclusions on the effect of tree removal previously analyzed in the DEIS.

Given the requirements of site clearance and grading, and the early phase of site design, it would be extremely difficult to determine whether the number of trees to be removed for each alternative would vary. Therefore,

⁴ However, the assertion in footnote 3 of the letter that the DEIS "contained no information about the trees on the site" is not supported by the facts. Please refer to pages A-13 and A-14 of the DEIS' discussion of the importance of protecting the significant trees on the site including the palms and the large oak trees within the 23 acres. In addition, the value of preserving the large eucalyptus and Monterey pines, despite their introduced status, is discussed on page A-15.



for the purposes of impact assessment, the FEIS takes a conservative approach by assuming that all trees would be removed in construction areas. In practice, however, as noted on page A-14 of the FEIS, as site planning evolves, the Presidio Trust will attempt to reduce the number of trees that are to be removed from the site (from the estimate provided in the FEIS), and will relocate mature trees to other locations, both on and off the Presidio. Efforts will be made to preserve the lives of these trees and to reduce the overall number of trees to be relocated.

Information on Water Demand – AYS commentors are correct in noting that water demand under Alternative 5 and cumulative overdraft has increased from the estimates provided in the DEIS. The reason for the difference between the estimates in the DEIS and FEIS is noted in footnote g on page 119 of the FEIS (“includes 8,197 gpd of recycled storm water used for irrigation”). However, an error in estimating the demand for Alternative 5 has been noted and is corrected in Attachment 3. The corrected water demand is less than what was reported in the FEIS (72,223 gallons per day instead of 84,574 gpd) and the baseline water allotment for the site (88,798 gpd), but more than what was previously reported in the DEIS (64,026 gpd).

Information on Housing and Road Intersection Conditions – The AYS commentors note that for the first time, readers learn in the FEIS that Alternative 5 will have a significant negative impact on the availability of low and moderate housing in the Bay Area. As noted in the Trust’s response to a comment by the city of San Francisco, the determination as to whether a less than one percent increase in demand for housing would be considered a significant impact is somewhat subjective (the city of San Francisco opined that *any* unmet housing demand would be significant). Nevertheless, in deference to the city, the shortage of housing for low- and moderate-income groups was noted in the FEIS, and the text in Sections 4.3.5.1 and 4.5.5.1 of the FEIS was revised from the language in the DEIS to call attention to the potential adverse impact on affordable housing in the city.

The AYS commentors also assert that new information also makes clear that there will be poor operating conditions at the intersection of Lyon and Lombard streets. The FEIS did not offer any additional information regarding the negative traffic impacts of Alternative 5 beyond what was provided in the DEIS. As in the FEIS, Section 4.5.7.2 (page 164) of the DEIS stated that both the intersection of Lombard Street/Lyon Street and the intersection of Presidio Boulevard/Lombard Street would fail in the p.m. peak hour under Alternative 5 without the recommended mitigation measures.

Implementation of Proposed Traffic Improvements – The AYS commentors note that necessary approvals, permits, and funding for the Caltrans intersection improvements have not been obtained. Although funding sources for the intersection improvements have not specifically been determined, the Trust will ensure funding to make the improvements identified. Prior to final design, the Trust will be entering into a Cooperative Agreement with Caltrans to include a funding agreement (see mitigation measure TR-1, *Lyon Street/Richardson Avenue/Gorgas Avenue Intersection Improvements* in the Monitoring and Enforcement Program in Attachment 1). This agreement cannot be finalized until acceptance by Caltrans of the Richardson Avenue Project Study Report/Project Report (PSR/PR).

The Presidio Trust will be working closely with Caltrans, through the PSR/PR process, and the project development team to ensure concurrence on the direction of the proposed intersection mitigation measures as



the project progresses. Obtaining permits from Caltrans for this project will occur after a satisfactory resolution of the PSR/PR and after final design has been completed. Caltrans regulations do not permit obtaining an encroachment permit prior to final design acceptance.

Environmental Consequences of Proposed Water Treatment Plant – The AYS commentors suggest that the new water treatment plant identified in the FEIS as mitigation would have environmental consequences that are not acknowledged or analyzed. The impacts of water reclamation are discussed on page 38 of the Responses to Comments volume of the FEIS. In addition, the mitigation measure specifies performance standards (e.g., compliance with water quality criteria, treatment processes, treatment reliability, monitoring and reporting, and restrictions for use of reclaimed water established by the California Department of Health Services in Title 22, Division 4 (Environmental Health) of the California Administrative Code) to ensure that the reclamation plant is safe, reliable, and protective of public health.

Implementation and Enforcement of Mitigation Measures – The AYS commentors ask which mitigation measures will be implemented and enforced. All mitigation measures identified in the FEIS to avoid or minimize environmental impacts that could result from implementation of the selected alternative have been deemed feasible and will be incorporated into the project. As part of its decision to implement Alternative 5, the Trust will adopt a Monitoring and Enforcement Program (MEP, Attachment 1) to ensure that the developer complies with them (including the Planning and Design Guidelines). Enforcement will occur through the actions that have been identified in the MEP that must take place as a part of each measure. The MEP also identifies the timing of these actions, who is responsible for implementation, and the agency responsible for enforcing or ensuring compliance with each action.

Effectiveness of TDM Program – The AYS commentors ask what will happen if the TDM program does not achieve the modal split established in the MEP. Based on traffic count monitoring and user surveys, Presidio-wide TDM strategies found to be ineffective or underutilized would be improved or replaced with other measures. The Letterman Complex lease would include provisions requiring implementation of appropriate TDM measures.

Inconsistent Information – The AYS commentors assert that the FEIS contains confusing and inconsistent information about key issues. AYS cites that, according to the FEIS, the Presidio is both easily accessible from downtown San Francisco and far from downtown. The FEIS also states at one point that 300 employees under Alternative 5 will reside on the Presidio and 265 at another. The Trust apologizes for any confusion the statements may have caused. Both statements should be understood and must be explained in the larger context of the discussion in the FEIS. With regard to proximity to downtown San Francisco, the Trust was only suggesting that the site is easily accessed from downtown from a real estate market perspective (say, compared to development opportunities in Pleasanton or San Jose). Later, the FEIS made reference to the site as being far from downtown from a mass transit point of view, because the Presidio has a lower transit mode split than sites located more conveniently to the MUNI bus and rail network, and hence has less impacts on MUNI.



With regard to housing, the Trust was referring to the proponent's request for 300 units of Presidio housing for its employees as part of its ground lease (housing demand), and later, to the smaller number of units (265) assumed to be available within the Presidio to satisfy this demand.

2.3 Natural Resources Defense Council (NRDC) and National Parks Conservation Association (NPCA) Together with Letter from Donald S. Green

A follow-on letter dated May 3, 2000, from NRDC and NPCA reacting to the Trust's response (Enclosure 2 to this report) to AYS's March 30, 2000 letter above, raised two points.⁵ First, NRDC and NPCA continue to dispute the conclusion regarding recirculation stating that "unreleased information about . . . impacts" requires the preparation of a supplemental EIS (citing CEQ regulation 1502.9(c)(1)(ii)). The Trust did not, as suggested, fail to consider this provision. Rather, this provision is inapplicable to the circumstance here and does not lead to the conclusion that a supplement to the EIS is required. The Trust has provided additional analysis and clarifying information in the FEIS. The refinements reflected in the FEIS as compared to the DEIS, such as acknowledgement of unavoidable adverse effects and the strengthening of the cumulative impacts analysis, are improvements made as a result of the Trust's careful and thoughtful consideration of public comment. This is among the important aims of – indeed may be the essence of – moving from a draft to a final version of an EIS. The CEQ regulation cited by NRDC and NPCA is not meant to be read to suggest that whenever an agency improves or adds to its analysis between the draft and final version of an EIS, a supplemental EIS is required.

Quite to the contrary. The goal of the draft/final distinction in the EIS (40 C.F.R. §§1502.9(a) and (b)) is to encourage public and agency comment and provision of new information and insights such that the Final EIS will be a document which improves upon what was presented in the Draft EIS. In responding to such comments in FEISs, agencies are specifically required to supplement, improve, or modify the analyses as well as to make factual corrections, and in appropriate circumstances, to modify the alternatives including the proposed action (40 C.F.R. § 1503.4). That is what is expected to occur with all EISs. Indeed, if any new information were enough to trigger yet another round of comments and responses, the NEPA process would never end. Furthermore, such an obligation would deter agencies from responding wholeheartedly in the FEIS to comments received as, indeed, this commentor has specifically complimented the Trust for doing in this instance.

Rather, CEQ set a deliberately high threshold for the preparation of a supplemental EIS – "significant new circumstances or information" which must be relevant to environmental concerns and which must bear on the proposed action or its impacts (40 C.F.R. § 1502.9(c)(1)(ii)). This use of the "significance" threshold for supplementation is essentially the same test as that for an EIS in the first instance.

Supplementation must be distinguished from another situation, one confined to Draft EISs, where a DEIS is "so inadequate as to preclude meaningful analysis." In such an instance, a revised draft must be recirculated. (40 C.F.R. § 1502.9(a). The Trust did not conclude, at the DEIS comment stage, that the DEIS was "so inadequate"

⁵ In addition to the responses to NRDC and NPCA provided here, the Trust sent a supplemental letter, dated May 16, 2000, responding to specific matters the organizations had raised concerning the Trust's comprehensive planning process. The Trust's May 16, 2000 letter is attached as Enclosure 4 to this ROD Attachment 2.



as to fall within the purview of this recirculation requirement, which does not apply to FEISs. Rather, the draft EIS provided sufficient analysis and scope to allow commentors to focus comments with specificity. This is indication enough that the standard was met and no recirculation is required.

Because the Trust improved and modified its analysis of impacts in response to comments, the commentors suggest that the Trust has met the “significance” threshold and must “recirculate” the FEIS. The Trust has concluded that the recirculation provisions, which apply only to DEISs, are inapplicable, and that the supplementation threshold has not been met. A factor to be considered is mitigation measures. Here, further analysis between the draft and the final EIS elaborated upon potential impacts related to such topics as the cultural resources, cumulative effects, wastewater, and traffic. In each instance, the Trust determined that the potential impact would be wholly or partially mitigated through the measures identified in the EIS to reduce these potential impacts below the level of significance. No supplemental EIS is required.

The comment letter also raises again the adequacy of the alternatives analyzed, claiming that based upon review of the background financial information cited in the FEIS, the Trust apparently never considered a development solicitation proposing a lower level of development than 900,000 square feet. A letter dated May 11, 2000 from Mr. Donald S. Green raises the same concern. In fact the Trust did consider the economics and financial return that would result from a smaller alternative by having considered alternative revenue scenarios as it developed the FMP. These FMP forecasts were later considered as part of the reasoning for having focused the development on a 900,000-square-foot market offering. In addition, as part of this EIS process, the Trust has considered the financial effects of a smaller development scheme and determined that it is inconsistent with the FMP’s goals for the Letterman project (see master response 10A in the Responses to Comments volume of the FEIS for a more complete discussion). A complete summary of the reasons considered by the Trust for having focused its alternatives in this way is presented above in response to AYS concerning alternative levels of development for the 23-acre site. The Trust’s purpose and need for this project allowed it to focus its alternatives analysis in this way.

Mr. Green’s letter suggests that because of the increase in the commercial real estate market in San Francisco, the Trust could consider a project of smaller scale that would generate the same amount of revenue. This approach is inconsistent with the purpose and need for this project. The Letterman 23-acre development is needed as the “economic engine” for the Presidio — the necessary means to generate sufficient revenues early in the GMPA’s implementation to address the critically deteriorating condition of other Presidio facilities. Even though commercial rent values have increased since the release of the RFQ soliciting the 23-acre development, the Trust is relying upon Letterman lease revenues to fuel other programs, investments, and capital improvements at the Presidio as a whole. Therefore, a development of 900,000 square feet is still both needed and desirable in order to maximize development income from this project. It is through the Trust’s additional comprehensive planning for the remainder of the Presidio that the Trust and the public will then have the opportunity to consider options for and analyze how the Letterman revenues can best be used.

2.4 California Native Plant Society

The Trust received an April 3, 2000 letter from the California Native Plant Society discussing the applicability of the NPS Organic Act and the GGNRA Act to the Presidio and claiming that the Trust is “too easily”



dismissing the park management and preservation goals of these statutes. A portion of the Trust's response is excerpted here:

You separately have raised a concern about the applicability of the National Park Service Organic Act and the Golden Gate National Recreation Area Act to the Presidio Trust. Purely as a legal matter, Congress did not make the NPS Organic Act technically applicable to the Trust. That said, the Trust fully recognizes that the Presidio is and remains part of the GGNRA. In creating the Presidio Trust, Congress directed that the Trust manage the leasing, maintenance, rehabilitation, repair and improvement of property within the Presidio under its administrative jurisdiction in accordance with the purposes of the GGNRA Act. Rather than focus on the technical legal applicability of the GGNRA Act or the NPS Organic Act, the Trust prefers to emphasize its obligation to preserve and protect the Presidio as a national park in accordance with the important principles of park preservation and protection set forth in the GGNRA Act and the NPS Organic Act, and to assure you and others of its commitment to these principles.

The Trust's complete response, letter dated May 1, 2000 to Mr. Pete Halloran, is appended as Enclosure 4 to this report.

2.5 National Trust for Historic Preservation, Western Office

As a concurring party, the National Trust concurs with the process set forth in the Letterman Complex Programmatic Agreement (PA) for development and review of design guidelines and design plans. The Western Office of the National Trust for Historic Preservation submitted an April 14, 2000 comment letter on the FEIS that begins:

The National Trust for Historic Preservation would like to begin our comments on the Final EIS with recognition and praise for a much improved document. We were pleased to see such detailed responses to our comments on the Draft EIS, affirmation of the Presidio Trust's commitment to the GMPA as its principal guide for all planning at the Presidio, a promise to undergo additional comprehensive planning at the site, inclusion of the financial management plan in the FEIS, a more detailed discussion of the impacts to the National Historic Landmark District from the preferred and other alternatives, and greater attention to interpreting the history of the Presidio at the Letterman site (page 1).

Following that general comment, the letter turned to specific questions and comments on the FEIS and sought clarifications on a few issues that the National Trust believed had not been adequately addressed in the FEIS.

Enforcement of Historic Compliance Guidelines – Like the AYS commentors, the National Trust remains concerned about the discretionary nature of the Planning and Design Guidelines and the unknown nature of the Trust's design and construction review process as means to avoid and mitigate impacts to the National Historic Landmark (NHL). The National Trust, although a concurring party on the Letterman Complex PA, comments that without mandatory application of the Guidelines, reliance on the process of the PA is inadequate to mitigate potential impacts.

There is no inconsistency in treating the Planning and Design Guidelines as both discretionary in some respects and as the assurance needed for conformity of new construction with the NHL setting. The assurance of compliance with the Guidelines sought by the National Trust will be available through the redundant system of reviews, checks, and balances built into the PA. Before the Trust can implement any aspect of the proposed design and construction, not only the SHPO, but NPS, and the public (including the National Trust and others with historic preservation interests) will have had repeated opportunities to review and comment on the extent to which the proposed design achieves compliance with the Guidelines as provided for in the PA. This aspect of the PA process affords interested agencies and the public a higher level of historic compliance review than is ordinarily afforded a project like this involving new construction.

The National Trust also reiterates a concern that the “proposed development already appears inconsistent with the Guidelines.” It is worth restating the Trust’s intent to ensure that the project design and construction ultimately conforms as closely as practicable to the Final Guidelines. Nevertheless, the guidelines themselves identify priorities and goals that may in their application be at odds with one another, necessitating tradeoffs among them. To the extent that the project as proposed is not now or may not in the future be consistent with the Final Guidelines, these departures have been identified and analyzed and the Trust will work to assure that these departures are minimized according to the terms of the PA. (For a complete discussion of the historic compliance process for the Letterman project, please refer to Section 1.4 of the FEIS and master responses 7A and 7B in the Responses to Comments volume of the FEIS.)

Scenic Views and View Corridors – The National Trust agrees that removal of LAMC will improve views at the site, but poses several questions about scenic views and view corridors as they would be affected by Alternative 5. First, views from Lincoln Boulevard looking east toward the DAC will be broad views looking into the complex and do not play the same role as view corridors, such as Edie Road and Torney Avenue, which would provide visual linkages within the Letterman Complex. At points along Lincoln Boulevard, existing open space (in the form of lawn areas) and existing trees provide a foreground with vegetative screening which will prevent the 4-story structure from having negative impacts on Lincoln Boulevard.

Views from the historic Letterman Complex down Edie Road consist of a straight-on view of a portion of the 3-story building façade. Next to this building is a gap approximately 50 feet wide, and then the gable end of a 2-story bar building. This gap provides entry into an internal service courtyard, which is concealed from view. Improvements to this view corridor might include adjustments to the alignment of the gap and elevation and massing adjustments to better respond to the view corridor.

Traffic and Transportation – The National Trust raised two concerns regarding traffic and transportation. The first concerned precautionary measures to protect the buildings and pedestrians from vehicular traffic in this tightly restricted area. The one-way exit from Gorgas Avenue will be studied more thoroughly through the Richardson Avenue PSR/PR. In developing and refining the alternative configurations of both internal and external roadways, pedestrian safety will be a high priority and adequate measures will be taken to provide for pedestrian safety and to ensure protection of adjacent buildings as necessary. These details will be worked out as part of the PSR/PR process.



Second, the National Trust sought clarification of how the funding and permitting for the reconfigured vehicular access routes to the Letterman development would be coordinated. Although a funding source for this project has not specifically been determined, the Trust will assure funding to make the necessary intersection improvements. Prior to final design, the Trust will be entering into a Cooperative Agreement with Caltrans to include a funding agreement. This agreement cannot be finalized until acceptance of the PSR/PR.

The Presidio Trust will be working closely with Caltrans through the PSR/PR process and Project Development Team to insure concurrence on the direction of the proposed intersection mitigation measures as the project progresses. Permit issuance from Caltrans for this project will occur after a satisfactory resolution of the PSR/PR and after the final design has been completed. Caltrans regulations do not permit obtaining an encroachment permit prior to final design acceptance. A construction schedule for this project has been identified following the completion of the PS& E; this schedule provides for completion of the intersection improvements prior to the opening of the development alternative. These improvements are not necessary for construction related traffic movements.

2.6 California Department of Transportation

In its April 5, 2000 letter, the California Department of Transportation (Caltrans) restated concerns about traffic operation and safety impacts of the proposed new intersections as outlined in the FEIS. The Trust has since met with Caltrans and is now engaged in a process that both parties agree is designed to result in responsiveness and an adequate resolution of Caltrans' concerns. The Trust's complete response to Caltrans, by letter dated May 11, 2000 to Mr. Harry Y. Yahata, and Caltrans' letter dated May 16, 2000 acknowledging that the two parties are moving toward a mutually agreeable solution of Caltrans' concerns as part of the PSR/PR process are appended as Enclosures 5 and 6 to this report.

2.7 Sierra Club and Correspondence from Jack Appel, Lewis Ellingham, Don Hodge, Matt Jalbert, Robert E. Johnson, Edward A. Mainland, Patrick McSweeney, Ron Patterson, and Noreen Weeden

By letter dated April 12, 2000, the Sierra Club requested to meet with the Trust to discuss fee parking generally and specifically as it could be applied to the Letterman project. In addition, a number of individual commentators noted above submitted comments raising the same concerns. The comments challenged the allocation of more than 1,500 parking spaces to the Letterman development on the 23-acre site and the absence of a market rate parking charge for the projected 2,500 site employees as being inconsistent with a goal to reduce driving at the Presidio. On April 21, 2000, Trust staff met with the Transportation Chair of the Sierra Club and determined that no modification of the project is warranted based upon the comments received. For a more complete response to the concerns, please refer to master responses 19 and 20 in the Responses to Comments volume of the FEIS.

2.8 Tides Foundation and Tides Center

In a letter dated May 8, 2000, the Tides Foundation and Tides Center submitted comments on the FEIS stating

[W]e would like to first express our appreciation for the thoughtful manner in which the Trust has attempted to respond to our concerns on the draft EIS . . . We would also like to acknowledge the

Trust's responsiveness to public requests for additional time in which to reply to this important document.

The FEIS and [responses to comments] provide new and significant information indicating, among other things, a willingness on the Trust's behalf [sic] to move toward a more comprehensive and publicly articulated plan for both the Letterman Complex as well as the entire Presidio. While we applaud this change, there still remain a number of broad and conflicting statements, which keep us from fully supporting the Final Letterman EIS." [page 1]

From these initial comments, the commentor went on to request information and clarification regarding the Trust's comprehensive planning as a demonstration of the Trust's good faith intentions to make the renewed comprehensive planning process for the Presidio meaningful. The Trust's initial response to the specific commitments sought is set forth in the letter dated May 17, 2000, appended as Enclosure 7 of this ROD Attachment 2.

2.9 Neighborhood Associations for Presidio Planning (NAPP)

By comment letter dated April 12, 2000, NAPP representing 10 neighborhood associations adjacent to the Presidio offered comments specific to the Letterman Planning and Design Guidelines. They wrote (1) seeking to ensure open space through the development of the 7-acre "Great Lawn" and through building development that "would not turn its back on the adjacent neighborhood"; (2) proposing alternative scales of development within the 23-acre site rather than a "fine-grained" pattern of development; and (3) objecting to the development of streets in the interior of the site and to using streets as the means to preserve view corridors. None of these comments warrant changes to the proposed action.

2.10 Margaret Kettunen Zegart

The commentor suggests that the entire Letterman Complex should be landscaped as a condition of occupancy of the 23-acre site. While the Presidio Trust is in support of landscape improvements within the unaffected portions of the complex, this would be difficult to impose upon the proponent of Alternative 5. The commentor also questioned the adequacy of traffic mitigation measures and the absence of square footage caps in the Planning and Design Guidelines. These issues are discussed in master responses 7A and 19 in the Responses to Comments volume of the FEIS.

2.11 Correspondence from Supervisor Candidate Davy Jones, Bea Kronert, and Jill Griffin

The Trust received a number of letters listed above generally reflecting support of the proposed action at the Letterman Complex.



A T T A C H M E N T 3
E R R A T A S H E E T

Final Environmental Impact Statement

Table 12, Water System Demand on Page 119– Change the water demand for Alternative 5 as follows:

	ALTERNATIVE TOTAL EST. DAILY WATER DEMAND	BASELINE LAMC/LAIR WATER DEMAND	NET DIRECT IMPACT	PRESIDIO TOTAL WATER DEMAND WITH ALTERNATIVE	PEAK PRESIDIO DEMAND MET BY AVAILABLE PEAK LOBOS CREEKFLOW	NET CUMULATIVE PEAK SHORTFALL
Alternative 5	84,574	88,798	-4,224	1,685,776	1,400,000	285,776
	<u>72,223</u>		<u>-16,575</u>	<u>1,673,425</u>		<u>273,425</u>

First Sentence in Section 4.5.3.1, Impacts of Water Consumption on Baseline on Page 233 – Change “85,000” gallons per day (gpd) to “72,000” gpd.

Second Sentence in Section 4.5.11.2, Water Supply on Page 242 – Change “286,000” gpd to “273,500” gpd.

Last Sentence of Mitigation Measure CR-1, Planning and Design Guidelines on Page 263 – Change the wording “as closely as practicable” to “to the fullest reasonable extent” to conform to the language in the Letterman Complex Programmatic Agreement in Appendix F of the FEIS.

Responses to Comments

Seventh Sentence of Third Full Paragraph of Master Response 7A, Consistency with Planning Guidelines on Page 26 – Change the wording “as closely as practicable” to “to the fullest reasonable extent” to conform to the language in the Letterman Complex Programmatic Agreement in Appendix F of the FEIS.

Last Sentence of Response to Comment 36-22 on Page 245 – Change the wording “accommodate the employee demand for 265 housing units” to “allocate 265 housing units to employees.”

Throughout Text – Change references made to a project study report (PSR) to a project study report/project report (PSR/PR).





Created by Congress in 1996, the Presidio Trust is charged with preserving the Presidio's natural, historic and scenic resources while making the park financially self-sufficient by 2013. Six Presidential appointees and the Secretary of the Interior or his designee sit on the Board of Directors and oversee management of 80 percent of the Presidio lands.

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