

**Family Violence
Prevention Fund**

INTERNATIONAL CENTER TO END VIOLENCE

BUILDING 100
PRESIDIO OF SAN FRANCISCO



Environmental Assessment

"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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FINDING OF NO SIGNIFICANT IMPACT

PURPOSE & NEED

The Family Violence Prevention Fund (FVPF or tenant) proposes to rehabilitate and adaptively reuse Building 100 as the International Center to End Violence (Center). The tenant's programs would be accommodated in the 33,800 square-foot historic building and in a new one-story, 3,800 square-foot addition that would infill the existing courtyard on the west side of the building. The primary goal of the Center would be to engage the public on the issue of violence against women and children around the world through education, advocacy and training programs. The following explains the need for the proposed project.

BACKGROUND

The Presidio Trust:

The Presidio Trust (Trust) is the federal agency charged with protection and management of the 1,168-acre inland portion of the Presidio of San Francisco (Presidio) known as Area B (see back cover). The Trust is rehabilitating and reactivating the former army post's historic buildings and landscapes as a part of the nation's largest and most visited urban national park.

The "Defender of the Gate" from 1776 until 1994, the Presidio was a military garrison for almost 220 years. In 1776, the Spanish founded El Presidio to prevent Russia and Britain from establishing a presence on San Francisco Bay. From 1822 to 1835, the Presidio became the northernmost outpost of an independent Mexico, and in 1846, during the Mexican-American War, the United States occupied the then derelict Presidio. Over time, the U.S. Army fortified, developed and landscaped the Presidio as America's premier military post on the West Coast. The Presidio is a showcase of military architecture dating from the 1860s to the Cold War era, and was designated a National Historic Landmark District (NHLD) in 1962. The Presidio contains over 800 buildings, of which approximately 470 are historic and contribute to its status as a NHLD. In addition, the Presidio contains significant cultural landscapes, including a 300-acre historic forest, designed landscape areas, and formal open spaces such as the parade grounds. These historic elements are complemented by important natural features, spectacular vistas, and recreational opportunities.

In 1994, the Presidio was transferred from the U.S. Army to the National Park Service (NPS). Following the passage of the Presidio Trust Act (P.L. 104-333) in 1996, Area B came under the jurisdiction of the newly created Trust. The Trust is a federal agency established by Congress and overseen by a presidentially appointed board of directors. The Trust's mission is to preserve and enhance the Presidio as an enduring resource for the American people. To achieve its mission, the Trust generates revenues by leasing the park's buildings. Federal appropriations diminish each year and will cease at the end of fiscal year 2012. The Trust uses these sources of funding to operate the park and undertake necessary capital improvements.

In 2002, the Trust adopted the Presidio Trust Management Plan (PTMP), which lays out a general framework for preserving and protecting the park's cultural, natural, scenic, and recreational resources for serving the public and for financing the park's care.

The Family Violence Prevention Fund:

The FVPF is a nationally known nonprofit organization with headquarters in San Francisco, and regional offices in Boston and Washington, D.C. The FVPF works to prevent violence within the home, and in the community, to help those whose lives are devastated by violence.¹ For more than two decades, the FVPF has worked to end violence against women and children around the world. Instrumental in developing the landmark Violence Against Women Act passed by Congress in 1994, the FVPF has continued to break ground by reaching new audiences including men and youth, promoting leadership within communities to ensure that violence prevention efforts become self-sustaining, and transforming the way health care providers, police, judges, employers and others address violence. Its publications and model programs have been distributed to and replicated in every state and in several foreign countries and have won countless awards. The FVPF receives support from federal and state governments, private foundations, and individual donors allowing for pioneering work in such program areas as children and domestic violence, health care, immigrant women, international and social justice, judicial education, public education and action, public policy, teens and partner violence, and employer responses to domestic violence.

STATEMENT OF NEED

Building 100 is a two-story, u-shaped building constructed in 1909 as infantry barracks along the Main Parade ground. The total gross floor area of the building is approximately 32,000 square feet. Its location at the end of the Montgomery Street row of similarly scaled brick buildings at the Main Post, and its fairly high degree of integrity despite previous alterations (enclosure of porches, additions of partitions), make Building 100 an important part of the Presidio.² The project is needed in order to:

- 1 Protect and enhance an historic building that is a contributing feature to the Presidio National Historic Landmark District, and prevent further and irreversible deterioration of the building caused by vacancy, through rehabilitation and use of the building
- 2 Bring the building up to safe occupancy standards consistent with applicable building codes and rehabilitation standards for historic buildings, and correct major deficiencies such as fire, life/safety and seismic hazards
- 3 Help support a public use goal of the Presidio to make the park welcoming to a wide range of visitors and contribute to the Trust's vision of the Main Post as a focal point for visitor orientation, and a setting for businesses, organizations and Presidio community services
- 4 Accommodate an organization that seeks physical space and can contribute to the visitor experience within the Presidio
- 5 Enhance the financial viability of the Presidio

¹ For more information on the mission and programs of the FVPF, visit <http://www.endabuse.org>.

² For a description of the physical appearance and statement of significance of the building, refer to the Historic Preservation Certification Application – Part 1 on file at the Presidio Trust Library, 34 Graham Street, San Francisco, California.

PURPOSE AND CONTENTS OF ENVIRONMENTAL ASSESSMENT

This environmental assessment (EA) identifies the environmental effects of FVPP's proposed International Center to End Violence within Building 100 at the Main Post district. The Council on Environmental Quality's (CEQ) regulations implementing the National Environmental Policy Act (NEPA) allow federal agencies such as the Trust to prepare an EA to assist agency planning and decision-making (40 CFR 1501.3). An EA provides evidence and analysis to determine whether an environmental impact statement (EIS) is required, aids a federal agency's compliance with the NEPA when an EIS is not necessary, and facilitates preparing an EIS if one is necessary (40 CFR 1508.9(a)).

This EA tiers³ from the PTMP EIS and analyzes specific action alternatives for preserving and rehabilitating one of the Main Post's historic buildings, an implementation activity and goal identified in the PTMP. In tiering from the PTMP EIS, the EA summarizes and incorporates by reference the information and analysis presented in the PTMP EIS and concentrates on site-specific issues related to the current project. PTMP EIS mitigation measures that have been incorporated into the current project are also discussed. The EA is divided into five sections:

- 1 Purpose and need for the project
- 2 Description of the project and alternatives considered, including a no project alternative
- 3 Affected environment and environmental consequences of the proposed project and alternatives, including mitigation measures
- 4 A synopsis of agencies, organizations, and persons consulted; and issues raised during consultation
- 5 A summary of the public involvement process, including responses to comments made during scoping

The EA serves as the factual support for the conclusions in the attached finding of no significant impact (FONSI). The EA/FONSI will be made available for public review for a minimum of 30 days before the Trust makes its final determination whether to prepare an EIS or move forward to implement the proposed project.

³ The coverage of general matters in broader EISs, with subsequent narrower tiered statements or environmental analyses, incorporating, by reference, general discussions and concentrating solely on the issues specific to the statement subsequently prepared (40 CFR 1508.28). The CEQ NEPA Regulations encourage the use of tiered documents to "eliminate repetitive discussions of the same issues" (40 CFR 1502.20) and to "focus on the issues which are ripe for decision and exclude from consideration issues already decided or not yet ripe" (40 CFR 1508.28(b)). The PTMP EIS can be viewed at the Presidio Trust Library or on the Trust's website at <http://www.presidio.gov/Trust/Documents/EnvironmentalPlans/>.

DESCRIPTION OF PROPOSED PROJECT AND ALTERNATIVES

The following describes the proposed project and the alternatives.

PROPOSED PROJECT

Under the proposed project, Building 100 would be rehabilitated for reuse as the International Center to End Violence. The Center would serve as the FVPF’s headquarters and include related general office use, exhibit space, an interactive learning center, meeting space, a training academy, storage and gift shop. Most of the public programming would take place on the first floor of the building, and the second floor would be devoted to administrative and office functions. The new one-level structure that would infill the existing courtyard on the west side of the building would be used primarily for training and assembly. The site would be landscaped and developed to include perimeter planting around the building; a contemplative garden (optional), walks, stairs and ramp.⁴ A breakdown of the building’s interior uses is as follows:⁵

USE	SQUARE FEET
CULTURAL (Exhibition, Orientation):	6,230
EDUCATIONAL (Training):	4,300
CONFERENCE (Board and Meeting Rooms):	1,180
RETAIL:	785
OFFICE (Offices, Workstations):	8,445
STORAGE / ARCHIVES:	1,520
MECHANICAL / ELECTRICAL:	580
CIRCULATION:	4,850
OTHER:	<u>3,315</u>
TOTAL	<u><u>31,205</u></u>

A building site plan and front and rear elevations of the building are provided on the following pages.

NO PROJECT

Under this alternative, the proposed project would not be implemented now or in the future. Building 100 would remain vacant and there would be no building rehabilitation or new construction. The building would remain deactivated for an extended period of time, and protected from weather, stabilized and secured from vandalism as funding permits through a process known as “mothballing.”

PTMP USES WITH NO COURTYARD ADDITION

Under this alternative, Building 100 would be rehabilitated for cultural/educational/office uses but would not include an infill addition as described above.

⁴ A complete description of the project is provided in the February 12, 2004 FVPF Proposal for Presidio Trust Building 100 prepared by the FVPF’s architect and available for review in the Presidio Trust Library.

⁵ Building square footages reflect best judgment and practices in effect at the time the calculations were made. They should be viewed as approximations and adjustments based on generally agreed upon methods of measurement will continue to be made accordingly.

Consultant

Stamp

Printing	Date

Scale

Drawn by

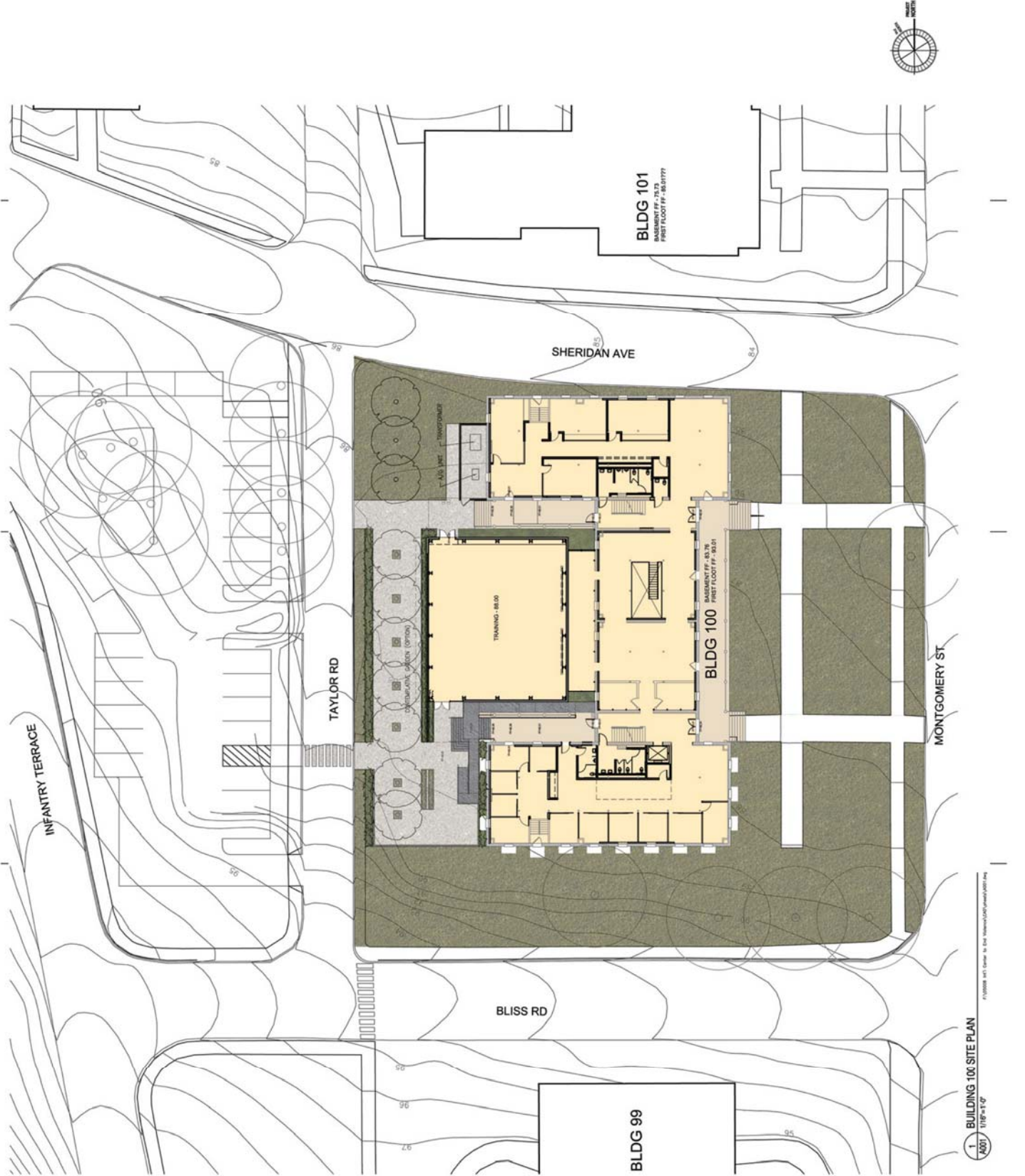
EHDD Job Number
05008

Sheet Title

SITE PLAN

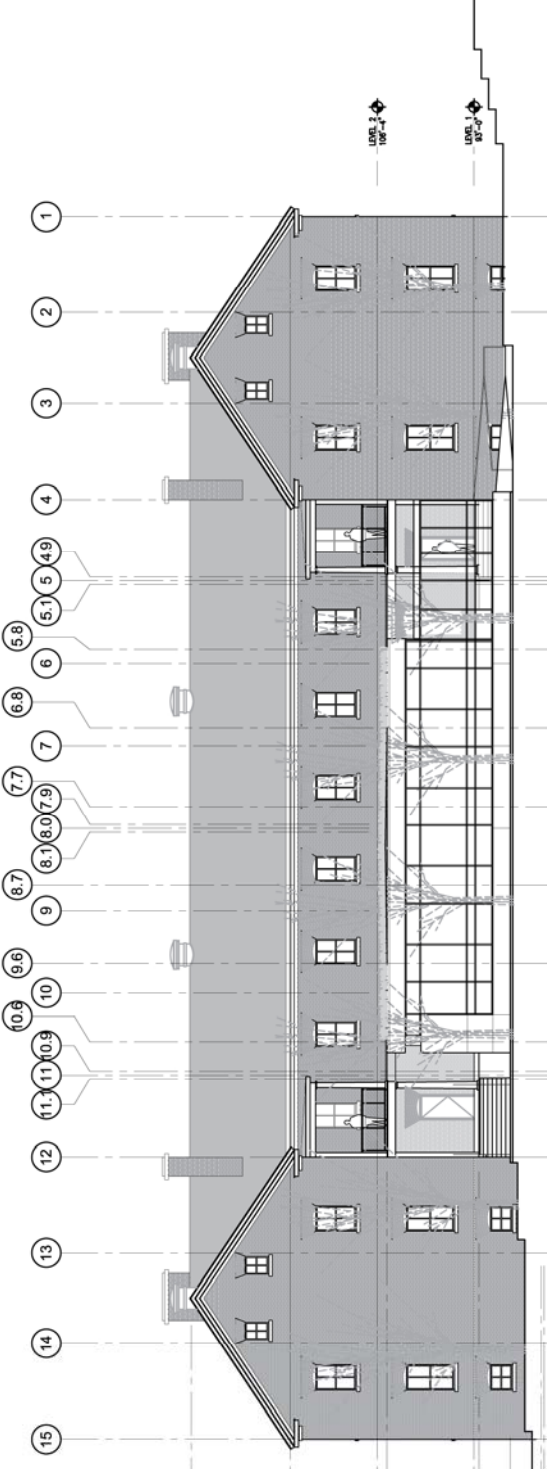
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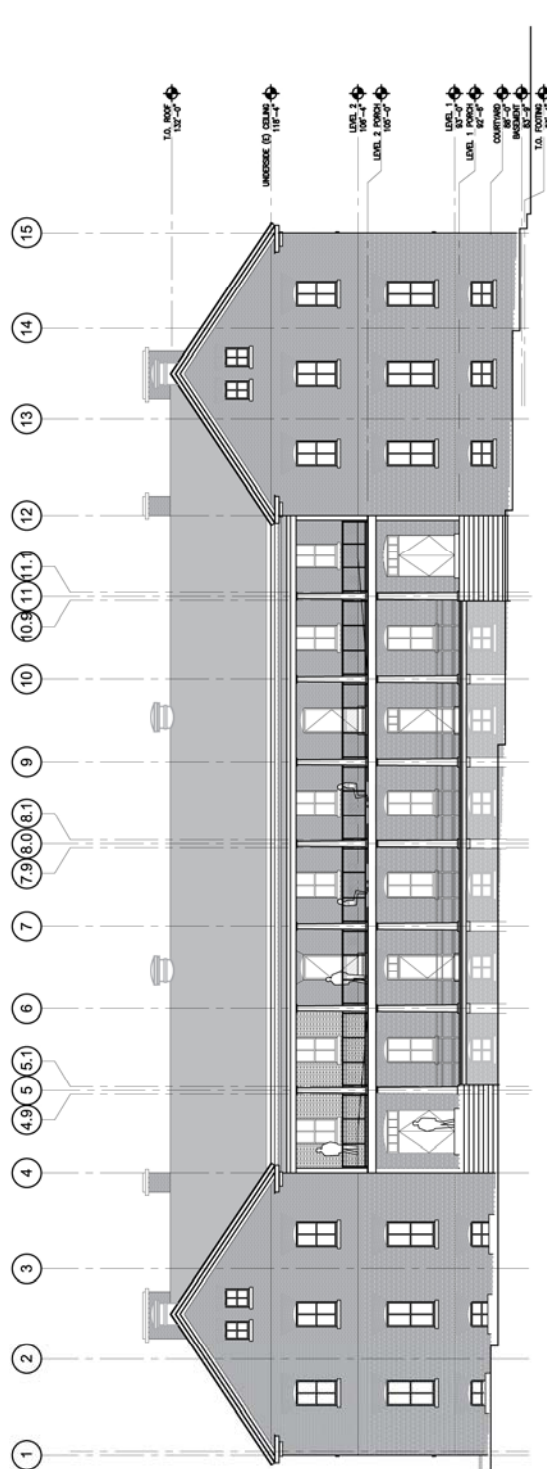
1 BUILDING 100 SITE PLAN
1/16" = 1'-0"
A001
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Table with columns: Printing, Date, Revisions, Date



Labels for levels and features: TO ROOF 132'-0", WINDOW (3) DECK 118'-4", LEVEL 2 100'-0", LEVEL 2 PORCH 100'-0", LEVEL 1 PORCH 97'-0", LEVEL 1 97'-0", LEVEL 1 PORCH 97'-0", TO FINISH 97'-0", TO FINISH 97'-0", TO FINISH 97'-0", TO FINISH 97'-0"

1 WEST ELEVATION: TAYLOR ROAD 1/8"=1'-0"



Labels for levels and features: LEVEL 2 100'-0", LEVEL 1 97'-0", TO FINISH 97'-0", TO FINISH 97'-0", TO FINISH 97'-0", TO FINISH 97'-0"

1 EAST ELEVATION: MONTGOMERY STREET 1/8"=1'-0"

ENVIRONMENTAL IMPACT OF THE PROPOSED PROJECT AND ALTERNATIVES

The following describes the environmental impacts of the proposed project and each alternative. For each impact topic, a summary of the issues discussed in the PTMP EIS is provided followed by a site-specific analysis of impacts of the proposed project and alternatives.

CULTURAL RESOURCES

Summary of PTMP EIS Impact Analysis:

The potential impacts of building rehabilitation and new construction within the Presidio on historic resources, including the NHLD are assessed on pages 199 through 202 of the PTMP EIS. The analysis presents a discussion of proposed changes within the Main Post including the maximum allowable new construction (110,000 sf) and demolition (20,000 sf). The analysis assumes that historic buildings would be rehabilitated and returned to active use, and additions to historic buildings may be necessary to make their reuse feasible.

The analysis concludes that the overall effect of future actions on historic resources would be beneficial. Rehabilitation and reuse of historic buildings would comply with the Guidelines for Rehabilitating Buildings at the Presidio of San Francisco, and the Secretary of the Interior's Standards for the Rehabilitation of Historic Properties (Standards) (Mitigation Measure CR-7 *Compliance with Standards for Building and Cultural Landscape Rehabilitation*). The Secretary of the Interior's Standards would direct the manner in which historic buildings are altered, in order to ensure that historic integrity is retained and to ensure that the rehabilitation is below the threshold of an adverse effect.⁶ Every reasonable effort would be made to incorporate compatible adaptive uses that require minimal alteration of the character defining materials, features, spaces and spatial relationships of historic buildings and their settings, while meeting financial and other goals. Building-specific assessments of existing conditions, their character-defining features, and physical history reports would aid in the successful rehabilitation process. Historic building rehabilitation would be reviewed consistent with the Programmatic Agreement (PA) that constitutes the Trust's compliance with Section 106 of the National Historic Preservation Act (NHPA).

New construction would be compatible with the NHLD through elements of building design, density, massing and character-defining features of the surrounding historic setting. Every reasonable effort would be made to adapt historic properties to new uses and to minimize new construction. New construction would primarily be undertaken as a means to encourage reuse of historic buildings: to enhance the function of an existing historic building; or to make their rehabilitation and reuse economically viable.

The Trust would use criteria and processes outlined in the PA in determining effects and pursuing consultation with the NPS, the Advisory Council on Historic Preservation (ACHP), the California State Historic Preservation

⁶ An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association (36 CFR 800.5(a)).

Officer (SHPO) and other parties, as necessary, for actions that could have an adverse effect on historic resources. Through the application of Planning Principles (pages 2 through 30 of the PTMP), Planning Guidelines for the Main Post District (pages 65 through 69 of the PTMP), and Section 106 consultation (including consultation regarding site-specific design guidelines and/or schematic designs for new construction), the Trust would ensure that new construction is compatible with the existing historic setting, and that the integrity of the NHLD is not impaired (Mitigation Measure CR-4 *Demolition and New Construction*). Historic landscape rehabilitation would also conform to the Secretary of the Interior's Guidelines for the Treatment of Cultural Landscapes.

Site-Specific Impact Analysis of Proposed Project and Alternatives:

PROPOSED PROJECT Building 100 and its associated cultural landscape are contributing elements to the NHLD. Originally constructed in 1909 for use as an enlisted men's barracks, the building has been modified over the years by the U.S. Army to modernize it (having most recently served as the band barrack prior to the U.S. Army's departure). According to the Presidio Physical History Report, despite the alterations, including the enclosure of porches and additions of partitions, the building retains a relatively high degree of integrity. Significant historic parts include the interior side of the exterior walls, the structure and the original remaining spaces (day room areas, etc.).

The proposed project would not have an adverse effect on Building 100, the Main Post or on the NHLD.

Building rehabilitation would be consistent with the historic character of the Main Post district and would meet the Secretary of the Interior's standards. The proposed rehabilitation would preserve the integrity of the roof's form and materials. The porches would be restored to their original design by removing the existing enclosure walls. The brick masonry walls will be retained and repaired where necessary to preserve the materials, as would the windows, which would be restored to their original appearance. The site would be made fully accessible. The two main stairways would be retained, repaired and made compliant with accessibility codes, and a new ramp would provide access from the back of the building. The expansive interior spaces would be restored by removing non-original walls and exposing the full interior volume of each wing. Interior finishes and details would be retained and repaired and missing elements would be replaced according to their original design. New demising walls would be designed using glass or appropriately spaced openings to retain the historic volume of the original spaces. A new small atrium opened between the first floor and the basement located inside the front entrance would house an additional stairway and allow a functional connection between these spaces.

The proposed courtyard addition would be a separate pavilion nestled between the rear wings, and connected only to the rear wall of the central wing. The structure would not have any contact with the existing rear porches, and would be compatibly scaled (one-story in height with ground floor at the level of the surrounding landscape) to reduce its visual impact and afford views of most of the historic building. The character of the addition would be definitively contemporary to differentiate the new elements from the old.

NO PROJECT If the currently vacant historic building is not rehabilitated, historic materials would deteriorate and the building would not survive indefinitely in its present condition. No repair to historic materials would

occur (mortar repointing, window repair and restoration, masonry anchoring and repair). Notwithstanding the best efforts to safeguard the building and provide minimal preservation maintenance and stabilization measures, this could result in the deterioration of historic fabric and decay of the building over the long-term.

PTMP USES WITH NO COURTYARD ADDITION This alternative would require minimal alteration of the character-defining materials, features, spaces and spatial relationship of Building 100 and its setting. Rehabilitation of the building would comply with the Secretary of the Interior's Standards.

ARCHAEOLOGICAL RESOURCES

Summary of PTMP EIS Impact Analysis:

The potential impacts of building rehabilitation and new construction within the Main Post district on both prehistoric and historic archaeological sites⁷ are analyzed on pages 215 through 217 of the PTMP EIS. As a result of two centuries of military development and early relic collecting, there are few, if any, surface indications of prehistoric sites. While only three sites have been recorded at the Presidio, all within the Crissy Field district, the potential for discovering additional prehistoric archaeological resources at the Presidio is high because of the extensive freshwater resources and the large estuarine lagoons and sloughs that once extended along the waterfront areas. In addition to the known sites along Crissy Field, the PTMP EIS identifies the Main Post as one of several areas as archaeologically sensitive for the discovery of prehistoric sites.

Historic sites are known to exist and are concentrated at various locations throughout the Presidio. At the Main Post, the historic properties represent a variety of types and include the site of El Presidio de San Francisco, the single most important archaeological site in the park, a Spanish/Mexican cemetery, staff, laundress and enlisted quarters, a quartermaster complex, a sutler⁸ residence and sutlery, and four other properties. Archaeological monitoring and preconstruction inspections are being completed by the Trust for most actions involving ground disturbance to allow archaeologists to make informed decisions about the likelihood of the presence of archaeological resources in a particular area prior to the approval of such activities.

The PTMP EIS analysis concludes that building demolition, new construction, infrastructure upgrades, and pavement or vegetation removal within the district could adversely affect archaeological sites. Guidelines in the PTMP and measures contained in the PA would help avoid or mitigate potential adverse impacts on sites, including preparing and implementing an archaeological management assessment and monitoring program to discover, document and protect predicted sensitive archaeological areas prior to construction (Mitigation Measure CR-9 *Ground Disturbing Activities*).

⁷ The PTMP EIS defines prehistoric sites as the physical evidences of Native American occupations prior to European colonial contact. These native peoples and their descendants were the first inhabitants of the Presidio. Today some of the descendants are known as the Ohlone. Historic sites are the physical evidences, usually augmented by written documentation, of the Spanish, Mexican, and American occupations which began in 1776, and could also include evidence of the Ohlone and other native peoples who occupied the Presidio in the 18th and 19th centuries.

⁸ A purveyor of victuals or supplies to an army.

Site-Specific Impact Analysis of Proposed Project and Alternatives:

PROPOSED PROJECT *The proposed project would not affect any known or previously identified archaeological properties in an unanticipated manner.* Historical research indicates that the project site has been subject to substantial topographic modification since 1871, most likely when the site was cut for construction of the building itself, and is not considered archaeologically sensitive. Although the development of the site has eliminated the possibility of encountering prehistoric deposits, there is the potential for encountering archaeological deposits after 1871, including U.S. Army domestic and commercial refuse deposits, during ground-disturbing activities such as infrastructure upgrades, infill construction and landscaping. Therefore, planned subsurface excavation for the proposed project would be monitored by a qualified archaeologist as part of an archaeological management assessment and monitoring program approved by the Trust. Prior to the initiation of construction or ground-disturbing activities, all construction personnel would be alerted to the possibility of buried cultural remains. Personnel would be instructed that the archaeologist on site has the authority to stop work in the immediate vicinity of any find. If historic features or artifacts are encountered, the archaeologist, in consultation with the Trust, would halt construction until the find can be identified. Once the find has been identified, plans for treatment and for the evaluation and mitigation of impacts to the find, if they are found to be National Register of Historic Places or California Register of Historical Resources eligible, would be developed.

If human remains are encountered during construction, work in that area would halt and the San Francisco County Coroner would be immediately notified. If the remains are determined to be Native American, then the Native American Heritage Commission (NAHC) would be notified within 24 hours as required by Public Resources Code 5097. The NAHC would notify the designated Most Likely Descendant who would provide recommendations for the treatment of the remains within 24 hours.

NO PROJECT Under this alternative, maintenance of the building and grounds would have minimal or low potential for affecting archaeological resources. No known or previously identified archaeological property is likely to be affected.

PTMP USES WITH NO COURTYARD ADDITION No new construction is proposed under this alternative. Direct effects on archaeological resources would be limited to ground-disturbing activities resulting from infrastructure upgrades and landscaping. Measures identified as stipulations of the PA and committed to as part of project implementation would avoid or minimize harm to archaeological resources.

BIOLOGICAL RESOURCES

Summary of PTMP EIS Impact Analysis:

Biological resources within the Main Post district are identified on pages 83 through 119 of the PTMP EIS and page 77 of the PTMP. The Main Post consists primarily of landscape vegetation that provides a rich cultural context and a unique historic sense of place, which sharply contrasts with the Presidio's forests and native plant communities. The Main Post's vegetation can be characterized by ornamental trees (of which some are specimen species), expansive open grassy areas (such as the unpaved parade grounds), maintained lawns,

and flowering foundation planting or low hedges. The landscaped vegetation generally has low wildlife value. However, some of the ornamental plantings, such as the eucalyptus and palms, despite their introduced status, offer fruits, berries and shelter that attract year-round resident and migrant birds. As shown on page 89 of the PTMP EIS, no native plant communities or species occur within the project vicinity.

The potential impacts of development within the Main Post are analyzed on pages 220 through 238 of the PTMP EIS, and in the 2002 U.S. Fish and Wildlife Service (USFWS) Biological Opinion. The analyses assumes that no construction activities (such as placement of fill material, mechanized land clearing, land leveling and road construction) would occur beyond existing developed areas and no existing natural habitat would be displaced. The PTMP EIS analysis indicates that future uses would be subject to the mitigation measures identified in the EIS and the “minimization measures” included in the Biological Opinion, as well as site-specific planning and environmental review that would take place prior to any substantial construction or demolition. The mitigation measures include:

- Restricting the use of non-native invasive plant species (Mitigation Measure NR-1 *Native Plant Communities*); and
- Following park guidelines for vegetation removal for protection of nesting birds (Mitigation Measure NR-9 *Wildlife and Wildlife Habitat*).

Site-Specific Impact Analysis of Proposed Project and Alternatives:

PROPOSED PROJECT *The proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community, or any threatened and endangered species.* The project site is in a developed area and does not support or provide habitat for any threatened or endangered wildlife species. The proposed project would not interfere with any native resident or migratory species. Furthermore, the project site is not located within or near any riparian habitat, sensitive natural community, or federally protected wetlands. Ornamental plantings within the project site would not be disturbed during bird nesting season unless Trust monitoring indicates nesting birds are not present.

Control of Invasive Species— The proposed project would include landscape vegetation plantings, including ornamental shrubs, trees, lawns and groundcover. The new courtyard addition’s green roof would be planted using native species.

When selecting plants for landscaping, plant species that can escape landscaped areas and invade native plant communities and other areas would be avoided. The Trust’s lists of approved and prohibited plant material for consideration in designed landscapes would be reviewed in plant selection. Plants that may be considered for planting and not found on the lists would be evaluated by qualified Trust staff specialists to determine their degree of invasiveness, and whether they can be successfully controllable to limit substantial impacts on park resources.

Protection of Nesting Birds— Since preparation of the PTMP, a small colony of Cliff Swallows (*Petrochelidon pyrrhonotahave*), which are protected under the Migratory Bird Treaty Act, has been known to nest on the Montgomery Street barrack buildings. If project activity commences during the bird nesting season

(January 1 to August 15), surveys in areas of suitable nesting habitat within 500 feet of project activity would be conducted. If no active nests are found, no further mitigation would be required. If construction is initiated and completed outside of the bird nesting season, no mitigation is required. If an active bird nest is found, a qualified biologist must determine that the activity has no potential to adversely affect the nest.⁹ Otherwise, appropriate buffers would be established and no project activity would commence within the buffer area until the biologist confirms that the nest is no longer active.

Protection of Bats— Prior to construction, the building would be visually investigated by qualified personnel to determine if bats are using the structure for roosting. Should any sign of bats be identified, recommendations would be made on how to minimize impacts and disturbance to bat roosts and how best to mitigate any impacts to the bat population.

NO PROJECT Under this alternative, there would be no alteration to native plant or wildlife habitat.

PTMP USES WITH NO COURTYARD ADDITION This alternative would result in the same impacts to biological resources as the proposed project.

WATER RESOURCES

Summary of PTMP EIS Impact Analysis:

WATER SUPPLY The potential impacts of development within the Main Post district on domestic water and irrigation demand are analyzed on pages 328 to 332 of the PTMP EIS. The Trust operates a facility that treats water from Lobos Creek to provide potable water to the park under permit from the California Department of Health Services (DHS). Supplemental water is purchased from the City and County of San Francisco (CCSF) as needed. Similar to Presidio supplies, the amount of CCSF water used varies significantly based on the type of water year. Between 1999 and 2003, CCSF provided between 6 and 18 percent of the total water consumed at the park, and the remainder was provided by Lobos Creek. During this period, use of CCSF water ranged from 0 gallons per day in the winter and spring to 1 million gallons per day (mgd) at the peak of the dry season.

Proposed uses within the district under the PTMP (Table 39, page 271) are taken into account in the Presidio's water demand calculations. Mitigation Measure UT-1 *Demand Management* would require tenants to implement Best Management Practices, referred to as BMPs, to encourage water conservation.

WASTEWATER The potential impacts of development within the Main Post district on the sanitary sewer system are discussed on pages 332 to 335 of the PTMP EIS. Waste water is collected from buildings at the Presidio and discharged into the CCSF's sanitary sewer system for treatment and disposal at the Southeast Wastewater Treatment Plant. The plant treats an average dry weather flow of about 67 million gallons a day and can treat up to 250 million gallons a day when it rains before discharge to the San Francisco Bay. During the rainy season, depending largely on the intensity of individual rainstorms, flows can exceed the treatment capacities of the plant and may be discharged directly into the San Francisco Bay through 29 combined sewer

⁹ Bird nests that would be protected are those stipulated in the Migratory Bird Treaty Act (16 U.S.C. 703 *et seq.*). However, the USFWS has determined that the protections of the Migratory Bird Treaty Act do not apply to nonnative, human-introduced bird species such as the rock pigeon (the familiar "pigeon" of cities and parks) [70 Fed. Reg. 12710-12716 (Mar. 15, 2005)].

overflows (CSO) structures located along the city's Bayside waterfront from Fisherman's Wharf to Candlestick Point. In 2005, the San Francisco Public Utilities Commission (SFPUC) launched a citywide \$150 million 5-Year Wastewater Capital Improvement Program to improve the reliability and efficiency of San Francisco's combined wastewater and storm water system, and address its most critical needs. A year later, the SFPUC launched its S.F. Sewer System Master Plan to review the long-term needs of the entire wastewater system.¹⁰

STORMWATER The impact due to stormwater runoff within the Main Post district are assessed on pages 335 through 341 in the PTMP EIS. The PTMP EIS notes that stormwater is collected from the district and routed to outfalls that discharge into Crissy Marsh and the San Francisco Bay. The assessment estimates the amount of net new construction (i.e. new construction less demolition) in the district to determine changes in permeable surfaces and thus stormwater runoff. The analysis determines that no additional demands or impacts on the district's stormwater systems are anticipated. The analysis notes that the stormwater systems are designed for a 50-year event, and can therefore accommodate additional flows. Mitigation Measure UT-7 Stormwater Reduction would require that infrastructure improvements be installed prior to new construction to minimize stormwater runoff and comply with existing water quality standards, regulatory requirements, and the Trust's stormwater quality control (pollution prevention) program.

WATER QUALITY Water quality issues within the Presidio are discussed on page 121 of the PTMP EIS. The Presidio has implemented and is operating under the Presidio of San Francisco Stormwater Management Plan (SMP) (Dames & Moore 1994), which includes a detailed Storm Water Pollution Prevention Plan (SWPPP) that outlines erosion prevention and sedimentation control measures used by the Presidio to avoid contamination of storm drains and surface water resources. The SMP is being updated to reflect changes in storm water routing as well as new Phase II stormwater permitting requirements. Water quality is also addressed for specific water resources, including Crissy Marsh (Area A).

The impacts of new construction on the Presidio's water resources are analyzed on pages 245 and 246 of the PTMP EIS. Various Presidio operations could result in indirect downstream impacts due to erosion, sedimentation, and discharges of other pollutants. Structural and operational stormwater pollution prevention measures (BMPs) would be developed and employed to reduce stormwater runoff volumes, protect water quality and meet water quality standards (Mitigation Measure NR-15 Best Management Practices and NR-19 Future Design).

Site-Specific Impact Analysis of Proposed Project and Alternatives:

PROPOSED PROJECT *The proposed project would not substantially increase the amount of water used, or waste water generated within the Presidio.* The proposed project would use a total of approximately 3,000 gallons of water per day.¹¹ The projected water consumption for the project is an increment of the total increase assumed for planning purposes by the Trust and the SFPUC, and an adequate water supply would be available for the proposed project. Water and sewer lines are adequately sized to handle existing and

¹⁰ Visit www.sfsewers.org for more information.

¹¹ Based on water demand factors provided in Table 1 Domestic Water Demand Calculations in Appendix H of the PTMP EIS (Volume III).

proposed flows, and no new water delivery or wastewater collection and treatment facilities would be required to service the project. The building and new construction would be designed to incorporate water conserving measures, such as low-flow fixtures and waterless urinals. Under terms and conditions of their leases, tenants are required to use water efficiently and responsibly, and are kept informed by the Trust of water conservation practices. Practicing water conservation to minimize water usage would also reduce wastewater generation and flows to the CCSF system.

The proposed project would not substantially inhibit surface water drainage, alter the landscape topography (i.e., involve a major change in grade), lead to increased runoff or erosion, or degrade surface or ground water quality. The new courtyard addition would feature a “green” (i.e., vegetated) roof, which would collect stormwater, and pervious paving would be used to the extent practicable. A stormwater management plan would be developed during project design to further reduce impervious cover, promote infiltration, and capture and treat stormwater using structural and operational BMPs. The BMPs would be designed in accordance with the Trust’s stormwater pollution prevention program. Any discharges to the storm drainage system would be oil/water separated.

NO PROJECT This alternative would not impact the amount of impervious surfaces or stormwater runoff at the Main Post.

PTMP USES WITH NO COURTYARD ADDITION Water demand under this alternative would be accommodated by the existing and planned supply, as anticipated by the Trust and the SFPUC and would use best-practices water conservation devices. Therefore, it would not result in a substantial or adverse increase in water use.

The change in the amount of impervious surfaces and stormwater runoff would be limited to circulation improvements. Similar to the proposed project, BMPs would be incorporated into the alternative’s stormwater management plan to manage stormwater runoff thereby limiting disruption and pollution of natural water flows.

HAZARDOUS MATERIALS

Summary of PTMP EIS Impact Analysis:

The PTMP EIS does not analyze the cleanup of hazardous substances, pollutants and contaminants at the Presidio. Rather, pages A-6 through A-10 in Volume III, Appendix A of the document provides information regarding the currently known extent of contamination. The assessment and clean-up activities related to hazardous substances, pollutants, and contaminants on the Presidio are being conducted by the Trust with oversight by the California Department of Toxic Substances Control and the Regional Water Quality Control Board. This program involves extensive investigation, analysis, reporting and remedial design and remedial action strategies. The characterization of contaminated sites, exposure pathways and potential health risks associated with reuse and redevelopment at the Presidio are addressed under regulatory controls separate from the NEPA process and the PTMP EIS.

Many of the historic buildings within the Presidio may contain asbestos, lead-based paint (LBP) or other hazardous materials, and soil within the drip-line of the buildings may contain LBP. Such hazardous materials

are remediated in accordance with remediation/stabilization and removal plans approved by the Trust and all applicable federal and state laws and regulations, which require protection of human health and the environment. Implementation of the plans ensures that exposure does not occur during the course of the cleanup activities. Institutional controls would be in place to protect future workers (e.g., notification to maintenance and construction workers). No improvements within areas where contamination exists would take place prior to remediation of those areas. The risk of human exposure following remediation is low and precautionary measures would be implemented. Because remedial actions would be protective of human health and the environment and would expedite and enhance the beneficial reuse of identified contaminated areas, the PTMP EIS concludes that potential impacts to human health, safety and the environment following cleanup would not be significant.

Site-Specific Impact Analysis of Proposed Project and Alternatives:

PROPOSED PROJECT *The proposed project would not pose a substantial present or potential hazard to human health or the environment.* The proposed project could involve handling and/or storage of hazardous substances, as the building may contain asbestos, LBP or other hazardous materials. Prior to construction, the tenant's subcontractor would be required to address such hazardous materials in accordance with local, state, and federal environmental laws and standards. The tenant would submit an Asbestos Plan and LBP Remediation Plan for review and approval by the Trust to ensure that environmental impacts associated with lead and asbestos remediation work are avoided or minimized.

NO PROJECT Under this alternative, hazardous materials abatement would be deferred until such time that an alternative proposal is implemented.

PTMP USES WITH NO COURTYARD ADDITION Similar to the proposed project, actions would be taken as part of building rehabilitation to ensure that asbestos is appropriately abated and lead paint is stabilized.

VISITOR EXPERIENCE

Summary of PTMP EIS Impact Analysis:

The potential impacts from expanded programs and interpretive and educational opportunities within the Main Post district on the experience of park visitors¹² are analyzed on pages 292 through 296 of the PTMP EIS. The analysis assumes that facilities for the visiting public would be concentrated in the Main Post and Crissy Field districts, including small and large visitor amenities within Main Post buildings. These cultural facilities would attract more recreational visitors annually to the park. Peak visitor use would occur primarily on weekend days and holidays with good weather. Mitigation measures identified in the PTMP EIS would ensure that visitation levels would not exceed desired conditions, and that unacceptable impacts to park resources and visitor experiences would not occur. These measures include limitations of visitor opportunities (Mitigation Measure CO-4), prohibitions on visitor uses (Mitigation Measure CO-5), management controls (Mitigation Measure CO-6), and monitoring of visitor levels (Mitigation Measure CO-8).

¹²Impacts on visitor experience include visitor orientation, interpretation, public access, park tenants, events and cultural programs.

Site-Specific Impact Analysis of Proposed Project and Alternatives:

PROPOSED PROJECT *The proposed project is not expected to adversely impact current or planned visitor services or recreation facilities*, due in large part to the Main Post's existing built environment, as well as current visitor use patterns and ease of public access. The Center is expected to attract approximately 5,000 visitors annually. Visitors would include middle and high school students, teachers, activists, FVPF supporters, tourists and the general public. Visitor activities and amenities would include trainings, presentations, exhibits and other artistic and educational events. The public would have access to the Center's front porch, exhibition area, gift shop and restrooms, and will be able to use the adjacent landscaped areas for walking, picnicking, special events being held at the Presidio and other activities. Inside and near the front entrance of the building, story board panels and approximately three to four historic photographs presenting and interpreting the historical significance of the building would be installed.

The tenant intends to develop a wide range of programs and an exhibit which will engage visitors to the Main Post and encourage them to reflect upon the social and political consequences of violence in our society. In addition, the FVPF would participate in Presidio interpretation programs for the benefit of the public, whether in concert with the NPS or otherwise. Such interpretive programs could include tours of the Presidio (including the Center's public areas) and other programs under development to facilitate public understanding of the history, development and current use of the Presidio.

NO PROJECT This alternative would not contribute to visitor serving uses within the Main Post.

PTMP USES WITH NO COURTYARD ADDITION Under this alternative, programs within the cultural and educational facilities would complement those already in place or proposed at the Main Post.

PARKING

Summary of PTMP EIS Impact Analysis:

Information on current parking supply and utilization of parking facilities within the Main Post is provided on page 182 of the PTMP EIS. The PTMP EIS indicates that there are approximately 2,270 parking spaces within the Main Post, with about 29 percent of the spaces occupied during midday. The utilization of all Main Post parking was surveyed more recently in the summer of 2006. Approximately 840 (37 percent) of the spaces were occupied midday on a weekday, an approximate 32 percent increase over year 2000 surveyed conditions described in the PTMP EIS.

An analysis of future parking demand and supply for the Main Post under the PTMP is provided on pages 314 through 315 of the PTMP EIS. The mix of land uses in the Main Post under the PTMP would generate a demand for about 2,015 parking spaces, and would provide approximately 2,116 spaces. The result would be a surplus of 101 spaces, or 5 percent more than the estimated parking demand. As described in the PTMP EIS, Main Post activities would generate peak parking demand at different times of the day. Thus, parking demand is based on the highest value of average weekday midday demand, average evening demand or average weekend demand in each planning area. The peak period of demand in the Main Post district is

expected to be the midday weekday period. The parking demand estimates and supply account for shared use of parking.

As required by Mitigation Measure TR-22 *TDM Program Monitoring*, the Trust would implement a Transportation Demand Management (TDM) program within the district to reduce automobile usage by all tenants, occupants and visitors. The Trust would monitor implementation and effectiveness of the TDM program on an ongoing basis. If TDM goals are not being reached, the Trust would implement more aggressive strategies or intensify components of the existing program, such as requiring tenant participation in more TDM program elements, increasing parking fees, and providing more frequent and/or extensive shuttle service.

Site-Specific Impact Analysis of Proposed Project and Alternatives:

PROPOSED PROJECT *The proposed project would not greatly increase the demand for parking.* The proposed project would generate an estimated parking demand of 53 spaces midday on weekdays and 27 spaces on weekend days. This demand is somewhat lower than what was anticipated under the PTMP in the midday weekday period, but higher during the weekend period. Based on the mix of land uses anticipated in the PTMP, the peak period of demand in the Main Post is expected to be the midday weekday period. The planned supply of 2,116 spaces in the Main Post district (based on midday weekday demand) would adequately accommodate the combined parking demand associated with the Center and other land uses in the Main Post anticipated in the PTMP. The FVPF would be required to comply with an approved Transportation Demand Management (TDM) plan¹³ designed to reduce demand for parking, and participate in a Main Post parking management program that may, among other policies, charge parking fees.

NO PROJECT This alternative would not generate parking demand or affect district parking supply.

PTMP USES WITH NO COURTYARD ADDITION Under this alternative, the cultural/educational and office uses in this building would generate a demand for approximately 66 spaces midday on weekdays and about 19 spaces on weekends. The planned parking supply of 2,116 spaces would accommodate district-wide demand, including demand for Building 100.

TRAFFIC

Summary of PTMP EIS Impact Analysis:

ROADWAY NETWORK The potential impacts of development within the Main Post district on future traffic conditions on Presidio and city roadways were analyzed on pages 302 through 320 of the PTMP EIS. Proposed development under the PTMP is estimated to generate 44,407 daily vehicle trips. The PTMP EIS and the subsequent PSH EIS conclude that following mitigation, local intersections would operate at acceptable levels except for the intersection of Lincoln/Bowley/Pershing, which would operate at LOS E, partially due to growth in overall regional traffic passing through the park. Strategies for reducing single-

¹³ The tenant's Draft TDM plan is included in Section 5 of the FVPF Proposal for Presidio Trust Building 100.

occupancy vehicle trips identified in Mitigation Measure TR-22 *TDM Program Monitoring* would minimize vehicular delays at local intersections.

CONSTRUCTION TRAFFIC The short-term impact of construction traffic on the roadway network due to construction activities within the Main Post district and elsewhere within the Presidio is discussed on page 321 of the PTMP EIS. Construction vehicles would include trucks hauling construction debris and delivering construction materials and supplies, as well as construction worker vehicles. The volume of construction vehicles accessing the district would vary, depending on the specific construction activity and the schedules of the various building elements of individual projects. Construction-related traffic could create some conflicts with local and regional traffic, especially from the larger construction vehicles. However, because construction vehicle trips traveling to and from the district would be dispersed, the vehicle trips on other regional roadways would not be substantial and would generally fall within the normal fluctuations of traffic. As required by Mitigation Measure TR-26 *Construction Traffic Management Plan*, a traffic management plan would be developed prior to construction to provide specific routes and other measures to minimize potential traffic impacts.

Site-Specific Impact Analysis of Proposed Project and Alternatives:

PROPOSED PROJECT *The proposed project would not substantially increase traffic congestion, traffic volume, or adversely affect traffic safety for vehicles, pedestrians and bicyclists.* The Center would generate vehicular traffic that would travel through several key intersections in the Main Post and the Presidio gates. Traffic impacts are generally assessed for the times of day when the cumulative volume of traffic on the affected roadway system is greatest – the AM and PM peak commute hours. The proposed project uses include somewhat less office space and more cultural/educational space than anticipated in the PTMP EIS. As a result, when compared to the traffic associated with PTMP-assumed uses, traffic generated by the proposed project would be more evenly distributed throughout the day and would be slightly less in the peak commute hours. The proposed project (including new construction) is estimated to generate 320 weekday daily vehicle trips, 26 vehicle trips in the AM peak hour, and 41 vehicle trips in the PM peak hour – slightly less than with the PTMP uses and no additional construction (discussed below).

Given that less vehicular traffic would be generated during the peak commute hours, the proposed project would result in a decrease in the overall peak hour traffic volumes expected to be generated by the Main Post as a whole in the PTMP EIS. Reduced traffic volumes during peak commute hours would have a beneficial effect on traffic conditions in the Main Post.

The FVPF would be required to participate in the Presidio-wide TDM program and has submitted a TDM plan, which outlines how its employees would be encouraged to use alternative transportation (see Parking section).

NO PROJECT This alternative would not contribute to traffic volumes through key intersections in the Main Post or the Presidio gates. Therefore, there would no effect on traffic congestion or traffic safety for vehicles, pedestrians or bicyclists.

PTMP USES WITH NO COURTYARD ADDITION Under this alternative, Building 100 would generate 341 weekday daily vehicle trips, 35 vehicle trips in the AM peak hour, and 43 vehicle trips in the PM peak hour. Therefore, this alternative would generate slightly more vehicular traffic at key intersections in the Main Post and the Presidio gates than the proposed project. The effect on traffic congestion or traffic safety for vehicles, pedestrians and bicyclists would be similar to the proposed project.

AIR QUALITY

Summary of PTMP EIS Impact Analysis:

The air quality impacts of development within the Main Post district are analyzed on pages 252 through 260 in the PTMP EIS pursuant to Bay Area Air Quality Management District guidelines (BAAQMD 1999). The analysis concludes that construction activities requiring use of heavy equipment would create fugitive dust particulate matter that could cause adverse effects on local air quality; and projected motor vehicle use would not cause violations of ambient air quality standards for carbon monoxide at congested intersections.

Feasible BAAQMD-recommended control measures for fugitive dust particulate matter (PM₁₀) would be required to limit adverse effects on air quality during demolition and construction activities (Mitigation Measure NR-20 *Basic Control Measures*). The Trust's TDM Program, which consists of activities conducted by the Trust and by the park's tenants, would implement relevant transportation control measures of the 2000 Clean Air Plan (CAP) to reduce the number and length of vehicle trips, and thus minimize air emissions and maintain consistency with the CAP (Mitigation Measure NR-21 *Transportation Control Measures*).¹⁴

Site-Specific Impact Analysis of Proposed Project and Alternatives:

PROPOSED PROJECT *The proposed project would not substantially increase vehicle emissions or emissions of other air pollutants, or generate significant nuisance dust or odors.* However, older adults in the adult rehabilitation center (Building 386) and children in the child development center (Building 387) would be sensitive to air quality impacts of the project. Construction-related emissions would result from a variety of construction activities, including demolition, excavation, vehicle travel, and vehicle and equipment exhaust, but would be short-term in duration and localized. Feasible BAAQMD control measures for dust (PM₁₀) would be implemented as part of a Construction Emissions Mitigation Plan to minimize adverse health effects as well as nuisance concerns such as reduced visibility and soiling of exposed surfaces. The plan would also incorporate U.S. Environmental Protection Agency (EPA) recommendations for construction equipment exhaust emissions that were provided during their review of the Trust's Public Health Service Hospital project (Mitigation Measure NR-X *Construction Equipment Exhaust Measures*).¹⁵ These measures require that all construction equipment used at the construction site would:

- 1 Not idle for more than ten minutes
- 2 Not be altered to increase engine horsepower

¹⁴ Note: CAP revisions made since preparation of the PTMP EIS incorporate the growth anticipated under the PTMP.

¹⁵ PHS Final Supplemental EIS, p. 170.

- 3 Be newer and cleaner (1996 or newer)
- 4 Be staged behind the building away from sensitive receptors (Buildings 386 and 387) as well as away from fresh air intakes to buildings and air conditioners
- 5 Include particulate traps, oxidation catalysts and other suitable control devices
- 6 Use ultra low sulfur diesel fuel with a sulfur content of 15 parts per million or less or other suitable alternative diesel fuel, unless the fuel cannot be reasonably procured in the geographic area
- 7 Be tuned to the engine manufacturer's specifications in accordance with a defined maintenance schedule

Motor vehicles use during Center operations would not exceed any BAAQMD thresholds of significance for criteria air pollutants, and TDM measures to reduce passenger vehicle trips and miles traveled would further reduce emissions.

The new courtyard addition's green roof would use high-albedo materials to reduce heat absorption and minimize impact on microclimate.

NO PROJECT This alternative would have no impact upon air quality.

PTMP USES WITH NO COURTYARD ADDITION Similar to the proposed project, this alternative would not cause a significant air quality impact. BAAQMD-recommended PM₁₀ control measures and U.S. EPA recommendations for construction equipment exhaust emissions would be implemented during construction. Emissions during operations would fall below significance thresholds.

NOISE

Summary of PTMP EIS Impact Analysis:

The noise impacts of development within the Main Post district are analyzed on pages 260 through 262 in the PTMP EIS using compatibility standards established by the City and County of San Francisco (CCSF) and the Federal Highway Administration. The analysis suggests that various locations would experience increased noise from traffic internal to the Presidio, including areas along Lincoln Boulevard, the San Francisco National Cemetery, and the residences along Riley Avenue nearest to Sheridan Avenue. The analysis concludes that while traffic volumes would increase noise above background levels, the increase would not be substantial (i.e., would not exceed applicable standards) and would not warrant mitigation (except the current practice of enforcing noise insulation requirements equivalent to the standards of Title 24 to provide an acceptable interior noise environment following building rehabilitation).

The PTMP EIS notes that construction activities would create short-term impacts on the noise environment. This noise could at times be distinctive and disruptive to park users and other people within close proximity of the activity. During construction, contractors and other equipment operators would need to comply with the San Francisco Noise Ordinance¹⁶ (Article 29 of the San Francisco Police Code), which prescribes working times, types of construction equipment to be used, and permissible noise emissions (Mitigation Measure NR-23 *General Construction/Demolition Noise*).

¹⁶ The San Francisco Noise Ordinance can be viewed at <http://www.municode.com/Resourcesgateway.asp?pid=14140&sid=5>.

Site-Specific Impact Analysis of Proposed Project and Alternatives:

PROPOSED PROJECT *The proposed project would not expose persons to or generate noise levels in excess of applicable standards.* Construction would result in increased noise levels from earthmoving and construction activities. The types of construction equipment to be used would typically generate noise levels of 70-80 A-weighted decibels (dBA) at a distance of 100 feet while the equipment is operating. Construction equipment operations would vary from intermittent to fairly continuous, with multiple pieces of equipment operating concurrently. Such noise levels, however, would not be continuous throughout the day and would be restricted to daytime hours. According to the PTMP (Figure 25, p. 130), the nearest noise sensitive area to the site is the residences along Riley Avenue. These residences are at least 300 feet from Building 100 and currently experience relatively high noise levels (i.e., commonly above 67 dBA¹⁷) from Doyle Drive traffic, which would tend to mask construction noise. Other nearby sensitive receptors are the child development center in Building 387 (located 330 feet from the building and buffered from potential construction noise by Building 99) and the adult rehabilitation center in Building 386 (at 530 feet). Trust-enforced noise standards would be applied to minimize noise disturbance in the vicinity of the project site during the construction process.

During operation, the Center and traffic generated by the use would not result in unnecessary, excessive, or offensive noise.

NO PROJECT This alternative would not create any noise.

PTMP USES WITH NO COURTYARD ADDITION Similar to the proposed project, this alternative would attenuate noise during construction to minimize disturbance in the vicinity of the project site. During operation, this alternative would not perceptibly increase the background noise levels or expose people to loud noise.

ENERGY AND SOLID WASTE

Summary of PTMP EIS Impact Analysis:

ENERGY The potential impacts of development within the Main Post district on electrical use are analyzed on pages 344 through 347 of the PTMP EIS. Square footages for proposed land uses within the district (provided in Table 39 on page 271) are used to project the electrical use and demand. The PTMP EIS assumes that tenants seeking electrical service upgrades for safety and efficiency (including repair and rehabilitation of old cables, and where possible, undergrounding of overhead lines) would work directly with the Trust or PG&E.¹⁸ Mitigation Measure UT-11 *Energy Conservation* would require tenants to employ energy conservation practices to assist the Trust in meeting the goals of Executive Order 13423 and to minimize the environmental impacts of energy consumption:

¹⁷ Short-term noise measurement taken on March 21, 2007.

¹⁸ While the Trust operates and maintains the electrical distribution system at the Presidio, it is a bundled service customer of PG&E. Therefore, tenants may choose service directly from PG&E.

SOLID WASTE The impacts of demolition and replacement construction within the Main Post and other districts on the regional waste stream are analyzed on pages 341 through 344 of the PTMP EIS. The Trust maximizes the recycling of construction and demolition (C&D) debris by requiring that mixed C&D debris must be transported off-site by registered transporters and taken to registered facilities that can process and divert from landfill a minimum goal of 65 percent of the material generated from construction, demolition or rehabilitation, including materials source separated for reuse or recycling. During operation, solid waste would be reduced through efficient resource use, recycling and reuse, by diverting organic material from waste, and by purchasing products composed of recycled materials as required by Mitigation Measure UT-8 *Waste Diversion*. Recycling bins would be available at all activity sites, and tenants would be encouraged to set aside indoor recycling areas.

Site-Specific Impact Analysis of Proposed Project and Alternatives:

PROPOSED PROJECT *The proposed project would not substantially increase the amount of energy used or waste generated within the Presidio.* Water-efficient plumbing fixtures and high-efficiency heating and cooling equipment, lights and appliances would be installed during rehabilitation of the building. The building would meet or surpass the energy conservation requirements of the current California Title 24 energy code, where these requirements do not conflict with historic preservation objectives. The FVPF would comply with Trust waste management policies, which require tenants to develop a recycling program in conjunction with their activities at the Presidio, and coordinate their recycling program with the Trust.

Building design would be reviewed under the Presidio Trust Sustainable Design and Building Guidelines, which establish such goals as energy conservation, the use of environmentally responsible materials (such as natural, recycled, salvaged, and durable products or materials made from renewable or biodegradable sources), and water conservation. In selecting materials for rehabilitation, historic features, resource depletion, toxicity, and disposal considerations would be taken into account. The tenant would participate in the Presidio Green Building rating program and report on sustainable practices and products utilized in the building. Finally, the FVPF has expressed an interest in seeking LEED (Leadership in Energy and Environmental Design) certification for the project to demonstrate their commitment to employing state of the art strategies for sustainable site development, water savings, energy efficiency, materials selection and indoor environmental quality.¹⁹

NO PROJECT This alternative would have no impact on energy use or waste generation within the Presidio.

PTMP USES WITH NO COURTYARD ADDITION Similar to the proposed project, the principles of sustainable design and technology would be applied during building rehabilitation. Building design would be reviewed by Trust staff for material use, energy efficiency, low toxicity and waste reduction.

¹⁹ A copy of a LEED annotated checklist prepared by the project architect (EHDD Architecture) is available for public review at the Presidio Trust library.

LIGHT AND GLARE

Summary of PTMP EIS Impact Analysis:

The impacts of introducing new light into the Presidio are analyzed on pages 248 and 249 of the PTMP EIS. The analysis indicated that building rehabilitation and new construction has the potential to increase light or glare in the Presidio, which would affect the character of the Presidio and day and nighttime views. To prevent the loss of dark conditions and of natural night skies, the Trust would seek the cooperation of tenants to prevent or minimize the intrusion of artificial light. The Trust restricts the use of artificial lighting to those areas where security, basic human safety, and specific cultural resource requirements must be met. Where artificial lighting is required, minimal impact lighting techniques and shielding of artificial lighting would be used where necessary to prevent the disruption of the night sky, physiological processes of living organisms, and similar natural processes (Mitigation Measure NR-7 *Artificial Light*).

Site-Specific Impact Analysis of Proposed Project and Alternatives:

PROPOSED PROJECT *The proposed project would not perceptively increase light or glare.* Additional code-required lights would be installed for visual needs and public safety; however these lights would be high efficiency, low glare, down-cast fixtures (per the current California Title 24 code and LEED V2.2 guidelines for new lighting), and limited to the entrances and porches. The exterior lighting design would be reviewed by Trust staff during design review to ensure that the new lighting minimizes light trespass from the building and site, reduces the proposed project's impact on the nocturnal environment, and eventually fits into a cohesive design scheme for the Main Post.

NO PROJECT This alternative would not impact natural darkness as the building would remain unlighted.

PTMP USES WITH NO COURTYARD ADDITION Similar to the proposed project, this alternative would maintain safe light levels while avoiding off-site lighting and night sky pollution.

VISUAL RESOURCES

Summary of PTMP EIS Impact Analysis:

Visual resources within the Main Post district are discussed on page 68 of the PTMP and pages 122 and 123 of the PTMP EIS. The landscape and buildings of the Main Post reflect roughly 225 years of human history. The forest on the steeply sloping southern hillsides provides a dramatic backdrop to the post and striking contrasts to the formal parade grounds. The open bluff along the Main Post's northern edge offers spectacular views of San Francisco Bay and the land features beyond.

The potential impacts on visual resources due to new development within the Main Post district are analyzed on pages 248 and 249 of the PTMP EIS. The analysis concludes that new buildings or building additions and site improvements would be necessarily designed and limited such that the visual character of the Main Post would not be substantially altered. New construction would conform to the PTMP Planning Principles and Main Post District Guidelines to help ensure that it would be compatible with adjacent historic buildings in scale,

massing and materials. The guidelines for the Main Post district address overall spatial organization and land patterns, buildings and structures, open space, vegetation, views, and circulation and access. Maximum building heights (30 to 45 feet) identified in the guidelines (page 67 of the PTMP) would not exceed that of existing adjacent buildings or key landscape features (such as the bluffs and forests) and would ensure that key views are not blocked.

Site-Specific Impact Analysis of Proposed Project and Alternatives:

PROPOSED PROJECT *The proposed project would not block an existing view, be visually intrusive or contribute to a degraded visual condition.* Both Taylor Road and Montgomery Street on either side of Building 104 provide views from the Main Post to San Francisco Bay. From the Main Parade ground, cameo views of the Golden Gate Bridge are provided between the Montgomery Street barracks.

Views along the Montgomery Street side of the building would remain unaffected as no new construction would occur on the building's front façade. The views up and down Bliss Road and Sheridan Avenue on either side of the building would be retained. To preserve the view from the rear of the building (i.e., Taylor Road side), the courtyard addition would be nestled between the building's "wings" and would only be one-story in height to be well below the eave line of the existing sloped roof. No mechanical equipment would be added to the roof.

In general, building rehabilitation and restoration of landscape features within the site would enhance the existing visual character of the Main Post and would have a positive effect on its visual integrity. Building design detailing and landscaping improvements that would enhance the site's visual qualities would include restoring the porches to their original design (by removing the existing enclosure walls) and replacing historic building elements and foundation plantings in keeping with the historic character of the building. The landscaped area and reestablished lawn would allow a clear view of the building from the Main Parade ground and clear sight lines from the building to distant views.

NO PROJECT Stabilizing and securing the building as part of mothballing would involve correcting deficiencies to control its deterioration while unoccupied. However, ensuring that the building would be in stable condition for an extended period of time (i.e., until its eventual rehabilitation) may prove difficult, and the site's visual qualities may erode over the long-term.

PTMP USES WITH NO COURTYARD ADDITION Building rehabilitation and restoration of landscape features within the site would enhance the existing visual character of the Main Post and would have a positive effect on the building and the district's visual integrity.

GEOLOGIC HAZARDS

Summary of PTMP EIS Impact Analysis:

The impact topic of geology and soils is discussed on page A-5 in Appendix A of the PTMP EIS. The Main Parade straddles a long narrow canyon that contains low-density artificial fill that was placed over soft Bay Mud, Colma Formation (a firm sandy clay soil) and colluvium (a thick soil composed of particles eroded from nearby slopes). This area has many of the same geologic characteristics as the nearby Marina District that

experienced extensive damage during the Loma Prieta earthquake.²⁰ This geologic subgrade is designated on the California Seismic Hazards Zone Map²¹ prepared under the Seismic Hazards Mapping Act of 1990 as a zone requiring investigation for seismically induced liquefaction²² hazards. Future earthquake ground motion is expected to be quite high due to the soft sandy hydraulic fill and the proximity of the San Andreas fault (about 7 miles southwest of the site), the Hayward fault (about 12 miles northeast) and other major, active regional faults. The PTMP EIS concludes that site-specific development projects would require supplemental review to evaluate geologic and seismic hazards.

Site-Specific Impact Analysis of Proposed Project and Alternatives:

PROPOSED PROJECT *The proposed project would not increase the threat to public health and safety due to seismic hazards.* To respond to the seismic hazard identified in the PTMP EIS, a structural investigation, which described existing conditions, performed material testing on building elements, and identified primary deficiencies based on seismic concerns (i.e., induced earthquake damage and possible falling hazards), was completed for the site.²³ The results of the investigation would be used to develop the scope of the proposed seismic and structural rehabilitation work.

The Trust would review the proposed upgrades in the final building plans during the permit review process. To ensure compliance with building code²⁴ provisions to the maximum extent feasible, when the Trust reviews the proposed work, it will determine the adequacy of the upgrade schemes to provide a level of performance that would reduce the risk of life loss or injury during a major seismic event. Therefore, potential damage to the structure from geologic hazards on the project site would be ameliorated through the Trust review of building permit applications. The Trust would approve the work only when the nature and severity of the seismic hazards at the site have been evaluated and appropriate mitigation measures have been proposed.

Construction activities have the potential to disturb and expose soil to forces of erosion. However, the completed project would not alter the overall topography of the site. As discussed in the Water Resources section, the Trust would minimize soil erosion by requiring contractors to employ Best Management Practices to contain disturbances within localized areas. Routine monitoring and reporting of BMP performance would be conducted pursuant to the SWPPP.

NO PROJECT This alternative would not threaten public health and safety in the event of an earthquake.

²⁰ Both are mapped Quaternary artificial fill (Qaf) by the U.S. Geological Survey (USGS) in USGS Professional Paper 782 (Julius Schlocker 1974).

²¹ The Seismic Hazards Mapping Act was developed to protect the public from the effects of strong ground shaking, liquefaction, landslides, or other ground failure, and from other hazards caused by earthquakes. The Seismic Hazards Zone Map for San Francisco can be viewed at http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_sf.pdf. The Trust uses the map in its land use planning and building permit processes, and requires site-specific geotechnical investigations be conducted identifying the hazard and formulating mitigation measures prior to permitting most developments designed for human occupancy within areas prone to liquefaction and earthquake-induced landslides.

²² Liquefaction occurs when loose, water-saturated sediments lose strength and fail during strong ground shaking.

²³ A copy of the structural investigation (Forell/Elsesser Engineers, Inc. 2007) is available for public review at the Presidio Trust library.

²⁴ The Trust uses nationally accepted model building codes, including the 2003 International Building Code, the 2003 International Existing Building Code, and the 2001 State Historical Building Code (SHBC) (Part 8, Title 24, California Code of Regulations).

PTMP USES WITH NO COURTYARD ADDITION Similar to the proposed project, this alternative would be approved only when the nature and severity of the seismic hazards at the site have been evaluated and appropriate mitigation measures have been proposed. Identifying and mitigating seismic hazards during structural design would reduce the threat to public safety and minimize the loss of life and property.

FIRE HAZARDS AND CRIME PREVENTION

Summary of PTMP EIS Impact Analysis:

The potential impacts due to the increased demand for law enforcement, fire protection and emergency response services resulting from an increase in resident and employee population in the Presidio is evaluated on pages 298 through 301 of the PTMP EIS. Law enforcement services at the Presidio are provided by the U.S. Park Police San Francisco Field Office (USPP), and fire protection and emergency medical services are provided by the NPS' Presidio Fire Department. Pursuant to an Interagency Agreement, the Trust reimburses the USPP and the NPS for the costs of providing law enforcement and fire prevention and suppression services. The analysis concluded that the increase in employee populations within Main Post and other districts would potentially raise the number of calls for police service, fire protection, and emergency response. The PTMP EIS assumed that the public safety service providers would review a specific proposal against public safety service standards following tenant selection within the district and identify any appropriate increases in staff, equipment, and facilities to maintain adequate services. Costs to provide services would be reimbursed through Service District Charges.²⁵

Site-Specific Impact Analysis of Proposed Project and Alternatives:

PROPOSED PROJECT *The proposed project would not create or contribute to a fire hazard or increase the demands for fire department or police services.* Installation of fire protection upgrades would maintain a reasonable degree of fire protection based primarily on the life safety of the occupants and firefighting personnel. Prior to building rehabilitation, construction documents and shop drawings would be submitted, reviewed, and approved by the Presidio Fire Department fire inspector as part of a life-safety evaluation. Construction documents would include all fire prevention requirements for the proposed use, including an automatic fire-extinguishing (i.e., sprinkler) system and fire alarm systems. Shop drawings and equipment specifications would be required to comply with the requirements of the National Fire Protection Association (NFPA) Fire Codes and Life Safety Codes and the Presidio Trust Tenants Handbook. Preservation of the integrity of the historic building would be effectively integrated with fire management through the use of "minimum impact" techniques. The water supply and delivery system would be designed and maintained to provide sufficient flows to operate fire sprinkler systems and fire hydrants. The Presidio Fire Department fire protection inspectors would issue permits once requested submittals have been reviewed and approved, inspect construction in progress, and provide life safety inspection of subsequent occupancy and public education to reduce fire loss.

²⁵The Presidio is exempt from state and local property taxes. Presidio Trust tenancies are subject to a service district charge to pay for Presidio-provided services, such as fire protection, police protection, road maintenance, street lighting, off-site landscape maintenance, stormwater drainage, and emergency medical response. This charge is subject to periodic adjustment.

The proposed project would not increase demand for police services. Prior to building rehabilitation, construction documents and shop drawings would be submitted to the USPP for security code compliance and installation of adequate security systems.

NO PROJECT While securing the building would reduce the risk, it would not protect the building from sudden loss by fire nor prevent vandalism and break-ins while it is unoccupied.

PTMP USES WITH NO COURTYARD ADDITION Fire protection and suppression, and crime prevention would be primary considerations in the design and rehabilitation of the building. Fire and crime prevention would occur through code-compliant upgrading of the existing structure.

CUMULATIVE IMPACTS

Summary of PTMP EIS Impact Analysis:

The cumulative impacts²⁶ of development on the Main Post and other districts within the Presidio are analyzed on pages 363 through 375 of the PTMP EIS. Table 60 on page 364 of the PTMP EIS, which provides the context for the discussion, enumerates 21 past, present and reasonably foreseeable actions, including projects by other agencies (NPS, USFWS, Golden Gate Bridge and the CCSF Planning Department) that were specifically considered in the analysis (in addition to background growth). The identified actions were chosen based on their proximity to the Presidio, their potential influence on the same resources that could be affected by implementation of the PTMP (i.e., whether the effects of these actions would be similar to those of the project), and the likelihood of their occurrence. The actions were identified by consulting with various agencies within a project impact zone (which varied for each resource) and investigating their actions in the planning, budgeting, or execution phase. In some cases, cumulative effects were also compared to appropriate national, state, regional, or community goals to determine whether the total effect would be significant. In all but one of the 25 resource topics that are analyzed, the analysis in the PTMP EIS determines that cumulative impacts would not be significant and that the resources of concern would not be degraded to unacceptable levels. Cumulative air quality issues were found to be potentially significant due to contributions to regional growth (i.e., not due to localized air quality impacts). Development within the Main Post district would contribute to the referenced cumulative impacts. No mitigation measures for cumulative impacts have been previously identified.

Contribution of Proposed Project to Cumulative Impacts:

CUMULATIVE ACTIONS AND RESOURCES AFFECTED *Overall, the incremental adverse effects associated with the proposed project are not expected to be significant. In several instances, the incremental contribution of the proposed project to the cumulative effect on the Main Post and Presidio would be neutral or beneficial.* Cumulative effects that have been described within the PTMP Final EIS are summarized below as they would pertain to other relevant cumulative actions that may have impacts in conjunction with the impacts of the proposed project. For the purposes of this discussion, these actions include the following:

²⁶ "Cumulative impact" is defined in CEQ's NEPA regulations as the "impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions ..." (40 CFR 1508.7).

- Rehabilitation and leasing of Buildings 5, 11-16, 35, 42, 56-59, 86, 87, 100, 104, 106, 122 and 211
- Construction of the apparatus addition to the fire house (Building 218)
- Construction of the transit center (Building 215)
- Construction of a 100-room lodging facility
- Rehabilitation of the Main Parade ground
- Management of the El Presidio site
- Restoration of the downstream portion of Tennessee Hollow
- Reconstruction of Doyle Drive (based on the likely preferred Presidio Parkway alternative)

And the following action, which was not contemplated in the PTMP Final EIS:

- Construction of a 100,000 square-foot public museum directly south of the Main Parade ground

Specific resources that may be affected by these cumulative actions include the following: cultural resources; archaeological resources; visitor experience; visual resources; traffic, noise and parking.

Cultural Resources— *Building rehabilitation, new construction and site changes at the Main Post would protect the historic character and integrity of the National Historic Landmark District.*

Establishing Cumulative Adverse Effect on the National Historic Landmark District One of the first requirements of the federal regulation (36 CFR 800 – Protection of Historic Properties) governing Section 106 of the National Historic Preservation Act (NHPA) is to determine and document the area of potential effect for each project or undertaking that a federal agency proposes. An area of potential effect includes both direct effects (e.g. construction disturbance or physical changes to character defining elements) and indirect effects (e.g., the introduction of new elements into an historic district). Multiple projects or undertakings occurring in the same planning area would have, at a minimum, overlapping areas of potential effect and more likely would have the same area of potential effect for all projects. Therefore, the entire Main Post is the area of potential effects for the projects or undertakings in this district. The responsibility of the Trust, then, under Section 106 would be to “take into account the effects of their undertakings on historic properties” for all projects in the area of potential effect. Further, because the Presidio is a National Historic Landmark, the Trust is required to “undertake such planning and actions as may be necessary to minimize harm to” the Landmark status.

In response to the NHPA requirements and to establish a threshold for minimizing harm to the Landmark, the Trust developed planning and guidance materials in several separate documents. The PTMP included management principles to “guide future actions and decisions” and ensure the long-term preservation of the Landmark District. The PTMP further included planning concepts and guidelines for all districts in the Presidio including the Main Post. Shortly after release of the PTMP, the Trust developed the Main Post cultural landscape assessment which both identified the historic sensitivities and provided treatment and planning recommendations which, if followed, would ensure consistency and compatibility of new projects in the Main Post area. Most recently, the Trust has drafted the Main Post Planning and Design Guidelines which builds on the PTMP and the cultural landscape analysis. This last guidance document takes into account all projects occurring in the Main Post and establishes a baseline of guidance that, when followed, would ensure that the cumulative effect of all projects would not be adverse to the Main Post or the Landmark as a whole.

Building Rehabilitation Rehabilitation of historic buildings would comply with the PTMP Planning Principles and Planning District Guidelines, and draft Main Post Planning and Design Guidelines. Building rehabilitation for compatible new uses would require minimal alteration of the character-defining materials, features, spaces and spatial relationships of the buildings and their settings. The Trust would commit to future planning and environmental analysis for the proposed undertakings, and the requirement for further consultation under Section 106 of the National Historic Preservation Act. Reuse and rehabilitation of historic buildings in the Main Post would ensure the preservation of these resources as well as meet the NHPA mandate for preferential use of historic properties over new construction. Rehabilitation of these historic buildings including Building 100 would have a beneficial effect on the Main Post and the Landmark as a whole.

New Construction New construction would be designed and sited to comply with the guidance in the draft Main Post Planning and Design Guidelines. New construction would include the courtyard infill additions between the “wings” of Buildings 100 and 104, small additions to existing buildings needed to make new program uses work (e.g. stairwells or elevators), three pavilions and a small café associated with the Anza Esplanade, the lodging facility on the Building 34 site, and the public museum adjacent to the south end of the Main Parade. New construction would be confined to existing or historic areas of development and designed and sited to minimize impacts on the association, setting, and feeling of the Main Post. Infill construction would be compatibly-scaled, and selectively placed and oriented to reinforce the historic framework and layout of the Main Post. In addition, the scale, massing, height, materials and color of infill construction would be compatible with the character of adjacent buildings or, in the case of the public museum, with the historic landscape. The Trust would continue to engage in public review before making any decision to proceed with construction of new buildings.

Previously completed new construction at the transit center (Building 215) and the fire house apparatus addition (Building 218), although constructed prior to the draft Main Post Planning and Design Guidelines, followed the same principles described in that document. Design guidance for the Building 218 addition came from a compatibility study prepared specifically for the project. This early study informed both the PTMP guidelines and the more recent draft Main Post Planning and Design Guidelines. Both projects were found to have no adverse effect in separate 106 consultations. By reinforcing the historic grid pattern of the Main Post, potential impacts from this new construction were minimized.

Construction of a new infill addition at the Building 104 courtyard was found to have no adverse effect through the Section 106 process. The Trust finds that the new addition proposed at Building 100 would also have no adverse effect. For the remainder of the Montgomery Street Barracks, the draft Main Post Planning and Design Guidelines state that new additions should be small and only as needed to make the new use work. These guidelines further state that infill additions should be avoided but rehabilitation needs of each building would be reviewed on a case by case basis. Following this guidance for the remainder of the Montgomery Street Barracks would minimize potential impacts to this entire cluster of historic resources, the Main Post as a whole, and on the Landmark as a whole.

Landscape Improvements Improvements at the Main Parade ground would rehabilitate the existing 6.2-acre parking lot into the green open space ‘heart’ of the Main Post. Proposed improvements would recognize the

historic military order in the landscape, and include opportunities for interpreting the Presidio's history. Existing landmarks and symbols would be incorporated, and important historic spatial and visual relationships would be reinforced, including the boundaries of the parade ground and the relationships between buildings and open spaces. Returning or reinforcing historic character defining elements that have been removed or have deteriorated through time would strengthen the association, setting, and feeling of the historic Main Post area. New elements would be compatible with the NHL, and changes would seek to avoid or minimize adverse effects to historic resources.

Restoration of the downstream portion of Tennessee Hollow would maintain important historic connections and relationships between other planning districts, reestablish or interpret missing historic features in the deteriorated historic landscape, preserve historic character defining elements, historic open spaces, and entry sequences.

Doyle Drive Reconstruction of Doyle Drive would result in an adverse effect on the Presidio National Historic Landmark District by: 1) introducing new structural and visual elements (i.e., viaducts, tunnels and an at-grade parkway) that would not resemble the existing Doyle Drive facility in overall location, massing and scale; and 2) requiring the destruction of contributing elements, including Buildings 201, 204 and 230, and alteration of contributing roadways, including Young Street, Halleck Street, Gorgas Avenue, Girard Road and Vallejo Street. Appropriate measures negotiated among the cooperating agencies and finalized in a Memorandum of Agreement (MOA) would address impacts to resources potentially affected by the proposed project. The Built Environment Treatment Plan (BETP) required by the MOA would establish treatments for resources and landscape elements that remain following reconstruction of Doyle Drive as well as describe treatments for the replacement of historic buildings and features that would be removed to make room for the new parkway. Implementing treatments identified in the BETP would present opportunities to meet the cultural resource management goals for the Presidio NHL, including interpretation, treatment, preservation, rehabilitation and restoration, which would contribute to beneficial cumulative impacts.

Archaeological Resources— *Building demolition, new construction, infrastructure upgrades, pavement or vegetation removal, creek restoration, and roadway reconstruction within the Main Post could adversely affect archaeological sites. However, guidelines in the PTMP and measures contained in the PA, PTMP EIS, Doyle Drive EIS, and site-specific Archaeological Management Plans (AMPs) would help avoid or mitigate potential adverse impacts.* The Trust would require archaeological review before undertaking or permitting ground-disturbing activities. Any ground-disturbing activities that may affect potential or known archaeological sites would be evaluated, and may be subject to a range of requirements, including but not limited to, avoidance of the sites, monitoring, coring or trenching, testing and/or data recovery, and compliance with the Native American Graves Protection and Repatriation Act (NAGPRA) if Native American human remains are encountered during the course of projects. Newly discovered archaeological sites would be evaluated for eligibility for listing in the National Register of Historic Places, either independently or as part of the NHL. All artifacts found would be cataloged, appropriately treated, and properly stored or displayed according to applicable federal standards. The AMP for the historic El Presidio site would be followed to protect and maintain the site, increase public awareness of this archaeological resource, recover data of archaeological significance, and provide for curation of archaeological collections and associated records.

Visitor Experience— *In general, cumulative actions would add to the visitor experience offered at the Main Post, and would enhance its setting for the arts and for historical and cultural programs related to the Presidio.* The rehabilitated buildings host new park tenants and programs. Improvements to the Main Parade would rehabilitate the existing 6.2-acre parking lot as the green open space ‘heart’ of the Main Post to accommodate an array of new public uses, including historical re-enactments, performances, special events, and everyday activities. The transit center provides visitors with public restrooms, connections to public transit, and information about what to do in the park. The lodging facility at the Main Post would improve visitor services, provide an opportunity for overnight visitor accommodation and ancillary services, and help establish the district as a vibrant visitor destination. The public museum would allow museum goers to appreciate and understand history, culture and art of the 20th and 21st century. The managed El Presidio site would create a compelling destination for visitors to learn about archaeology and commemorate this cornerstone of this park. Restoration of the downstream portion of Tennessee Hollow would provide trails, smaller pathways, seating, landscaped areas, and interpretive components, and provide recreational benefits of a more naturalized landscape (nature walks, birdwatching, ecological stewardship, photography, painting, etc.) to improve the visitor experience. Finally, reconstruction of Doyle Drive would provide a new compatibly-designed Presidio entrance (Girard Avenue) in the northeaster part of the Main Post to serve as the main vehicular entry for tenants and visitors to the district. However, during the Doyle Drive construction period, the visitor experience at the Main Post would be degraded as the normal scenic and tranquil setting would be disrupted by the sights and sounds of construction. Visitors would still have full access and use of the facilities within the district.

Visual Resources— *Under the cumulative actions, existing major view corridors afforded from the Main Parade and El Presidio would be maintained and protected.* Rehabilitation of the historic buildings would create a positive visual change within the Main Post. New construction would be limited, but where allowed, it would be compatible with the visual setting. The lodge between Graham and Anza Streets would reestablish the visual separation that historically existed between the Main Parade and the Old Parade. Restoring the Main Parade and reinforcing the edges of the historic open space through new design features would complement the rehabilitated historic buildings and improve visual quality by reducing pavement and introducing grass and other compatible materials. Main Parade improvements would also anticipate opportunities to enhance physical and visual connections to Crissy Field when Doyle Drive is replaced. Restoration of Tennessee Hollow would improve the existing visual setting by expanding natural habitat areas and providing an important visual (and ecological) corridor, which would form a unique visual backdrop to the developed environment of the district. The realignment of Doyle Drive would generally improve views from the Main Post of the shoreline and bay by placing portions of the roadway at or below ground level and eliminating the visual and physical barrier created by the current elevated structure. However, Doyle Drive construction activities would require the presence of substantial amounts of equipment during this four- to five-year long process and would include grading, the removal of plants and trees, and demolition of existing structures, resulting in an adverse visual change.

Traffic— *Residents, visitors, and employees may experience temporary delays and other inconveniences (such as noise) associated with construction activities, and would need to use other roadways in the Presidio to reach their destination.* The potential for increased delay and congestion would depend on the timing of construction activities associated with each project, and measures that would be implemented to eliminate or

reduce potential impacts (such as, with Doyle Drive, public awareness campaigns and increased transit service). At a minimum, in each case, detour and/or other signs would be posted to inform drivers.

Following construction, site improvements would improve circulation, creating distinctions between vehicular and pedestrian routes, and enhance connections to the surrounding buildings, the transit center, and the Presidio as a whole. The transit center would provide safe and convenient access to transit and orientation information to visitors, and would include a waiting area and public restrooms. Road and intersection improvements would be made to minimize traffic congestion and enhance safety. Occupation of rehabilitated and newly-constructed buildings would contribute a small amount of traffic to the overall increase expected to be generated by the Presidio. In the PTMP EIS, proposed development throughout the Presidio was estimated to generate 44,407 daily one-way vehicle trips, and the Main Post was estimated to generate 11,860 of those trips. The preliminary information about the cumulative projects identified above suggest that, when combined with currently occupied buildings, the Main Post district would generate approximately 9,550 daily one-way vehicle trips. This is approximately 700 trips (or 8 percent) more than the number of trips associated with the land uses anticipated in PTMP for these same buildings and new construction. Approximately 100 of these additional 700 one-way vehicle trips would occur in the PM peak commute hour, and the number of AM peak hour trips would be slightly less than anticipated with PTMP. Compared to PTMP assumptions, the additional 100 PM peak hour vehicle trips would represent a 9 percent increase in PM peak hour traffic generated by Main Post uses and ultimately a 2 percent increase in future PM peak hour traffic generated throughout the Presidio. Because of the Main Post's central location in the Presidio, the additional 100 PM peak hour vehicle trips would immediately disperse to several different intersections. The intersections in the Main Post that would be most affected by the additional traffic were forecast to operate at LOS D or better in the peak commute hours in the PTMP EIS. The operation of these intersections is not expected to be significantly affected by the additional trips generated by the cumulative projects identified above.

As noted in the PTMP EIS, the traffic increases would adversely affect the operation of some intersections farther from the Main Post. However, mitigation measures adopted as part of the PTMP EIS would improve intersection operations to acceptable levels under cumulative conditions, except for the intersection of Lincoln/Bowley/Pershing, which is forecast to operate at an unacceptable level of service due to overall regional traffic growth. Long term cumulative impacts associated with the new Doyle Drive were addressed in the PTMP EIS transportation analysis. Overall, the Doyle Drive project would result in a benefit or little change to long-term traffic conditions in the region.²⁷

Noise— *Construction activities would temporarily increase noise within the Main Post.* This noise could be considered any annoyance by park users and building occupants within close proximity of the activity. There may be times when noise could interfere with indoor activities in nearby uses adjacent to project sites. Noise impacts could be intermittently disruptive or annoying to persons nearby, however, they would be temporary in nature and limited to the period of construction. All construction activities would be conducted in compliance

²⁷ Cf., Draft Environmental Impact Statement/Report and Draft Section 4(f) Evaluation, South Access to the Golden Gate Bridge (Doyle Drive) prepared by the San Francisco County Transportation Authority, dated December 2005.

with the San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code), which prescribes working times, types of construction equipment to be used, and permissible noise emissions.

Various locations would experience increased noise from traffic generated by cumulative actions, including areas along Lincoln Boulevard, the San Francisco National Cemetery, and the residences along Riley Avenue nearest to Sheridan Avenue. While traffic volumes would increase noise above background levels, the increase would not be substantial (i.e., would not exceed applicable standards) and would not warrant mitigation (except the current practice of enforcing noise insulation requirements equivalent to the standards of Title 24 to provide an acceptable interior noise environment following building rehabilitation or new construction). The Trust would review final building plans to ensure that building wall, floor/ceiling assemblies, and windows meet the standards regarding sound transmission.

Reconstruction of Doyle Drive would result in potential construction noise impacts on the north end of the Main Post. Occurring over a construction period of multiple years, construction noise would be intermittent, and the level would vary depending on the type, location and length of the activity. Generally, noise would range from the mid- to upper-80s dBA at locations within 100 feet of the project construction limits. Construction equipment would operate in a limited area then move along the alignment until the completion of the project. Implementing the measures specified in the Doyle Drive EIS and the PTMP EIS would reduce negative noise effects. Doyle Drive is not expected to create any permanent noise impacts, as traffic noise would not differ noticeably from present conditions.

Parking– *The identified cumulative projects could result in unmet parking demand during the midday weekday period.* Improvements to the Main Parade ground would replace the central 740-space parking lot with smaller, decentralized parking lots to better serve the Main Post. These decentralized lots would include expansions to existing lots, improving the efficiency of layouts in existing lots, and some new parking lots. Existing street parking would be preserved, and new street parking would be added. Nearly all of the existing district supply (excluding Infantry Terrace) of approximately 2,150 parking spaces would be relocated to simplify access and reduce their visual impacts. After the decentralized lots and added street parking is complete, approximately 2,055 parking spaces would remain in the Main Post (excluding Infantry Terrace) as described in the Main Parade EA. Some of these 2,055 spaces were planned to be located on the sites of the proposed 100-room lodge and 100,000 square-foot museum, and could potentially be displaced by these two projects. Preliminary information about the cumulative projects suggests that midday weekday parking demand in the Main Post would increase to approximately 2,150 parking spaces (excluding Infantry Terrace). This estimate assumes shared use of parking supply, parking management (including fees), and management of resources to accommodate special events. If parking spaces are not provided on the sites of these two cumulative projects, total parking demand in the district could exceed supply after parking spaces on the Main Parade are relocated to other locations within the district.

The availability of parking is not considered a permanent physical condition, as it is a condition that varies with demand. Therefore, parking supply is not considered a significant resource under NEPA. Parking deficits are not considered to be environmental impacts to the physical environment, but rather social effects. Although a parking deficit is not considered to be a direct environmental effect, there are possible secondary

environmental effects associated with parking shortfalls. Motorists circulating to find parking spaces can contribute to increased traffic congestion at intersections, and associated air quality and noise impacts.

As required by Mitigation Measure *TR-22 TDM Program Monitoring*, the Trust would implement a Transportation Demand Management (TDM) program within the district to reduce automobile usage and associated parking demand by all tenants, occupants and visitors. The availability of alternative transportation modes and the Trust's TDM program provide mitigation measures for these potential secondary environmental effects. Constrained parking supply combined with TDM measures (e.g., downtown PresidioGo service) would minimize these secondary environmental effects associated with motorists circulating to find parking spaces since some motorists would choose to use other modes. The Trust would monitor implementation and effectiveness of the TDM program on an ongoing basis. If TDM goals are not being reached, the Trust would implement more aggressive strategies or intensify components of the existing program, such as requiring tenant participation in more TDM program elements, increasing parking fees, and providing more frequent and/or extensive shuttle service.

Reconstruction of Doyle Drive is expected to include an underground parking facility at the eastern end of the alignment between the Mason Street warehouses and the Gorgas Street warehouses. The parking garage would provide parking spaces to mitigate the parking impacts associated with the Doyle Drive project.

Contribution of Action Alternative to Cumulative Impacts:

Overall, the incremental adverse effects associated with the other action alternative (i.e., PTMP Uses with No Courtyard Addition) would be similar to the proposed project and would not be significant. The incremental contribution of the action alternative to the cumulative effect on cultural resources within the Main Post and Presidio would be less than the proposed project, as no infill addition would be constructed. Thus, the character-defining spatial relationship of Building 100 and its setting would not be altered.

PLAN CONSISTENCY

Presidio Trust Management Plan:

The following discusses possible conflicts between the proposed project and the objectives of land use plans, policies and controls for the area concerned. The site is located on the Main Post in Area B of the Presidio, which is under exclusive federal jurisdiction of the Trust. The Trust's formally adopted statement of land use policy is the Presidio Trust Management Plan (PTMP). This consideration of PTMP objectives and policies is carried out as an integral part of the Trust's weighing of environmental and non-environmental factors in reaching a rational and balanced decision. The discussion of land use conflicts will be used and relied upon in the Finding of No Significant Impact. Under NEPA, the Trust retains the authority to move forward with the proposed action, despite any possible conflict. Potential conflicts with provisions of the PTMP that would cause physical environmental impacts have been evaluated as part of the impacts analysis carried out for other topics in this EA.

PROPOSED PROJECT *The proposed project would not conflict with PTMP planning principles or guidelines that relate to physical environmental issues.* The Center's total square footage devoted to public programming would contribute 10,500 square feet towards the accommodation of cultural and educational uses at the Main Post. This would represent approximately 5 percent of the building space that would ultimately be devoted to cultural and educational uses at the Main Post under the PTMP (page 37). The PTMP acknowledges that the precise nature of cultural and educational facilities would depend largely on opportunities offered by tenants and park partners, and by the buildings themselves (page 36). The PTMP gives preference to such tenants as the FVPF since it would offer services to park visitors and its constituencies are national in scope (page 39). The PTMP allows for the construction of the courtyard addition, since it would encourage reuse of the historic building (page 6) and provide visitor amenities (page 35). The PTMP would require that the courtyard addition be:

- carefully integrated into the Main Post's landscape (page 63)
- carried out in accordance with the planning guidelines set forth in the PTMP (page 63)
- configured to be compatible with the NHLD (page 64)

The 3,800 square-foot courtyard addition would represent approximately 3.5 percent of the permitted maximum new construction of 110,000 square feet at the Main Post under the PTMP.

NO PROJECT This alternative would not contribute to the PTMP's goal to enliven the Main Post as a visitor and community center. As timely building rehabilitation would not occur, this alternative would also be inconsistent with PTMP historic preservation objectives. In addition, this alternative would be inconsistent with the PTMP financing strategy to generate revenues as a result of leasing to ensure the Trust's long-term financial viability and accomplish other plan objectives.

PTMP USES WITH NO COURTYARD ADDITION Rehabilitating the historic building for cultural, educational and office uses would be consistent with PTMP historic preservation objectives, planned building square footage, and preferred uses for the Main Post. As noted by the PTMP, this alternative would be expensive to establish and operate, and would require funding by a sponsoring organization or other outside source.

AGENCIES AND PERSONS CONSULTED

This section describes the agencies that were consulted during preparation of the EA, and the process that would be followed to satisfy NHPA consultation requirements.

ADVISORY COUNCIL ON HISTORIC PRESERVATION/CALIFORNIA STATE HISTORIC PRESERVATION OFFICER/NATIONAL PARK SERVICE

As described in the PTMP EIS (page 82), the Trust is required to comply with the NHPA. Section 110 of the NHPA sets out the broad responsibilities of federal agencies to integrate preservation into their ongoing activities, and requires agencies to “minimize harm” to National Historic Landmarks like the Presidio. Section 106 of the NHPA requires federal agencies to take into account the effects of their actions on historic properties, and to seek comments on their actions from an independent federal reviewing agency, the Advisory Council on Historic Preservation (ACHP). The ACHP’s regulations governing consultation under Section 106 further require the agency to consult with the applicable State Historic Preservation Officer (SHPO) and any other organizations or individuals who express an interest in being part of the Section 106 process.

During preparation of the PTMP, the Trust consulted with the ACHP, the California SHPO, and the National Park Service – Golden Gate National Recreation Area (NPS-GOGA) as well as with the National Trust for Historic Preservation (NTHP), and the Presidio Historical Association (PHA, formally known as the Fort Point and Presidio Historical Association) as concurring parties and executed a Programmatic Agreement (PA) regarding the plan and various operation and maintenance activities within Area B. This PA establishes procedures by which the Trust will satisfy its Section 106 responsibilities.²⁸

Federal Historic Preservation Tax Incentives:

Because the FVPF is electing to seek federal tax credits, the Trust would follow the process stipulated in the PA for projects applying for federal historic preservation tax incentives. The PA states that certification of the rehabilitation through the Internal Revenue Service tax incentive review process would ensure conformance with the Secretary of the Interior’s Standards for Rehabilitation and would replace Section 106 review for the project. Once the tax incentive review process is engaged, the provisions of the Internal Revenue Code of 1986 and its associated regulations and guidelines govern the review of the project. The tax incentive review process for Building 100 would involve only the project proponent, the California State Historic Preservation Office (SHPO), and the National Park Service Office of Technical Preservation Services (NPS-TPS). Neither the Trust nor the PA parties would have a role in this review process. In the unlikely event that the project should not achieve “Certified Rehabilitation” status or should the project be withdrawn from the tax incentives certification process, Section 106 responsibilities would again apply and historic preservation review would be accomplished through the stipulations of the PA.

²⁸See Appendix C of the PTMP EIS for the full text of the agreement.

Although the tax incentive review process would replace Section 106 review, the Trust would retain responsibility to ensure that the project meets applicable codes regulations, standards, and guidelines such as building codes, accessibility, health/life safety, and all such regulated design and construction requirements. The Trust would continue to review the project for conformance with these important requirements as well as to ensure consistency of the project with other Trust developed or adopted design and performance standards and guidelines.

Historic Preservation Certifications Pursuant to Section 48(g) and Section 170(h) of the Internal Revenue Code of 1986 (36 CFR 67) describes a three part submittal process in applying for federal historic preservation tax incentives. The sequential submissions first certify that the property to be rehabilitated is on the National Register of Historic Places. The second submission provides the reviewers with details on the proposed rehabilitation project for certification that it meets the Secretary of the Interiors Standards for Rehabilitation. The third and final submission is to certify that the rehabilitation work has been completed consistent with the previous two certifications and is required to obtain the historic preservation tax credits.

To promote a successful review process, the FVPF engaged in early consultation with the SHPO, NPS-TPS, and the Trust while program and design concepts for the building were being developed. Beginning in the fall of 2005 and throughout the first months of 2006 several formal and informal discussions were held with SHPO and the Trust to consider design and program goals and requirements. In particular, considerable discussion was held around compatibility for the proposed new addition in the Building 100 courtyard. A pre-submission meeting was held on February 14, 2007, in the Sacramento offices of the SHPO attended by representatives of the SHPO, Trust, and FVPF. The purpose of the meeting was to receive initial feedback on the total rehabilitation proposal. Comments from both the SHPO and Trust representatives were favorable about the proposed project. However, at the request of the SHPO to formally engage the tax certification review process, the FVPF submitted a Part 1 Application to the SHPO on May 15, 2006.

FVPF submitted a Part II Application on June 18, 2007 and is currently in discussions with the SHPO on specific elements of their proposed rehabilitation concept. The SHPO has 30 days to review the Part II Application. The review time may be lengthened if either the application is found to have omissions or if the SHPO requires clarification on specific aspects of the submission. Upon completion of its review, the SHPO forwards the Part II Application to NPS-TPS with a recommendation. NPS-TPS also has 30 days to review the application and may either certify the Part II Application as submitted or request changes or clarifications in the rehabilitation proposal. Clarifications or changes required by NPS-TPS may also lengthen the review time allotted to that office. Achieving a Certified Rehabilitation determination on the Part II Application from NPS-TPS indicates that the proposed rehabilitation meets the Secretary of the Interior's Standards for Rehabilitation.

Consultation With all Parties on the EA:

Following issuance of the Notice of Intent, a consultation package summarizing the project status and describing the process for review was mailed on June 1, 2007 to all PA parties. The cover letter explained how Section 106 compliance would be replaced with the tax credit review process, per the PA Stipulation XIV Rehabilitation and Investment Tax Credit Projects. It also stated that comments received during the public

scoping period would be sent on to the SHPO and NPS-TPS for their consideration during review of the FVPF Part II Application.

The NPS-GOGA and PHA both submitted letters responding to the project proposal (see the following section for a summary of the comments and responses to issues raised). Per the process described in the June 1, 2007 consultation package cover letter, a summary of the comments and copies of the NPS-GOGA and PHA letters were sent to both SHPO and NPS-TPS on June 28, 2007. Consideration of the NPS-GOGA and PHA comments will be at the discretion of reviewers from those two agencies.

PUBLIC INVOLVEMENT

The following describes the process used to invite the participation of the public prior to preparation of the EA.

SCOPING PROCESS AND ISSUES RAISED DURING SCOPING

The Trust informed the public about the project and invited public comment through a scoping notice that was sent to interested parties and posted on the Trust's website. By the close of or shortly after the 30-day public scoping period for the proposed project (May 11, 2007 – June 11, 2007), the Trust received letters from the National Park Service – Golden Gate National Recreation Area (NPS-GOGA) and the Presidio Historical Association (PHA). The following is a summary of the two comment letters with responses to the issues raised.

Courtyard Addition:

COMMENT The proposed addition to the building gave the PHA “great concern.” They believed it “does violence to the form of the band barracks, and weakens its special quality and uniqueness when compared to the other barracks.” The PHA supported the principle of not allowing any addition in the courtyard “at all costs.” The NPS requested that the EA include at least one alternative that preserves the building without altering its historic fabric and context with infill construction.

RESPONSE The proposed addition would have little or no impact on the historic building. The addition would retain all the historic elements of the existing structure, return the surrounding porches on the 2nd level to their original open design, restore the historic material of the 1st level porches by replacing missing materials, have no contact with the existing porches and would be attached only in the rear to the building. It would be a separate pavilion that is low in profile – one story in height, limiting its visual impact, and clearly contemporary in design to differentiate it from the old. All aspects of the new addition (as well as other rehabilitation components) will be subject to review by the California SHPO and NPS-TPS as part of the tax credit application process, and thereby held to the highest interpretation of the Secretary of the Interior's Standards for Rehabilitation. At the request of the NPS-GOGA, the EA evaluates an alternative whereby the building would be rehabilitated but would not include an infill addition (see discussion under PTMP Uses with No Courtyard Addition in Section 3).

Landscaping:

COMMENT The PHA felt the row of trees behind the building was designed to mask the addition, but all it does is to introduce an inappropriate intrusion. “Such a line of obscuring trees has no currency in the vocabulary of landscape in the Main Post and should be rejected along with the infill.”

RESPONSE Rehabilitation of the historic landscape or the design of new landscape components at Building 100 would conform to the Secretary of the Interior's Guidelines for the Treatment of Cultural Landscapes. The landscape plan would also be subject to landscape rehabilitation guidelines in the Main Post Planning & Design

Guidelines upon review by Trust staff to ensure that the plan eventually fits into a cohesive design scheme for the Main Post.

Proposed Use and Program:

COMMENT The PHA did not see how the tenant contributes to making the park welcoming to a wide range of visitors. The NPS-GOGA encouraged the Trust to work with the tenant to bridge the Presidio's history with the mission and goals of the tenant and to develop programs and exhibits that will stimulate visitors to the park to return often to participate in programs at the Center.

RESPONSE The Trust's conviction that offering visitors a variety of ways to experience the Presidio is key to the park's success. This means considering tenants who are involved in intellectual leadership, social action, education, public health and welfare, research, environmental stewardship and communication (among other areas), and whose constituencies are international in scope, such as the FVPF. The Trust will work with the FVPF, as it does with other tenants, to help meet the community service needs of the park's visitors. Similarly, the Trust will ensure that the NHL-listed building leased by the tenant is rehabilitated in a manner consistent with federal regulations pertaining to historic buildings, and the Trust's own high-level of cultural landscape management and district planning. The tenant has already indicated its intentions to develop a wide range of programs and an exhibit which will engage visitors to the park and encourage them to reflect upon the social and political consequences of violence in our society. However, there is no reason to hold this tenant or any other to creating a bridge between their mission and the Trust's – to establishing a link between what they do and the park's history. Such links are often contrived and only demean the public experience and undermine any genuine understanding of history.

Coordinated Approach:

COMMENT The PHA thought the Main Post should have a more unified concept for its development with users which would work together to welcome the public, and educate them about the history of the Presidio. "If it happens no where else in the Presidio, such a coordinated approach should happen in the Main Post which is, after all, the heart of the Historic District."

RESPONSE The PHA's request and concept for the Main Post is not supported by Presidio Trust Act requirements (or market conditions). The Trust must give consideration to many factors in developing the Main Post that extend beyond educating visitors about the park's history. First and foremost, the Trust must give emphasis to users that enhance the financial viability of the Presidio and facilitate the cost-effective preservation of historic buildings. Other factors include obtaining reasonable competition in leasing, considering the extent to which prospective users contribute to the reduction in cost to the federal government, bringing the Main Post's buildings into compliance with federal building codes and regulations, and seeking a diversity of tenant types. The Trust accomplishes these requirements while protecting the Presidio from "development and uses which would destroy the scenic beauty and historic natural character of the area and cultural and recreational resources" (Presidio Trust Act). Furthermore, adaptive reuse of the Main Post's buildings according to the Secretary of the Interior's Standards for Rehabilitation and the Trust's own carefully

crafted documents (such as the Main Post Planning & Design Guidelines) responsibly halts deterioration and returns buildings to use, ensuring their longevity while enabling interpretation as part of a “living” historic district. Thus, while the Trust is bound to rehabilitating and leasing historic buildings at the Main Post to host new tenants, those users are not responsible for interpreting the post’s evolution. Experience at the park over the past 10 years has also shown that users that can meet the Trust’s tenant selection criteria *and* can tell stories of the Presidio are extremely limited.

FINDING OF NO SIGNIFICANT IMPACT

This finding of no significant impact (FONSI) provides the basis for the Presidio Trust's (Trust) determination that proposed modifications to Building 100 for the proposed International Center to End Violence (Center), as analyzed in the attached environmental assessment (EA), will not have a significant effect on the human environment and does not require the preparation of an environmental impact statement (EIS). A description of the proposed project and its environmental consequences are contained in the EA, which is incorporated by reference into this FONSI.

PROPOSED PROJECT

Building 100 is located on the Main Post within the grounds of the Presidio of San Francisco (Presidio) and contained within the boundaries of the Golden Gate National Recreation Area in the City and County of San Francisco. The two-story, u-shaped building was constructed in 1909 as infantry barracks along the Main Parade ground. Its location at the end of the Montgomery Street row of similarly scaled brick buildings at the Main Post, and its fairly high degree of integrity despite previous alterations (enclosure of porches, additions of partitions), make Building 100 an important part of the Presidio. The Family Violence Prevention Fund (FVPP or tenant) proposes to rehabilitate and adaptively reuse Building 100 as the International Center to End Violence (Center). The tenant's programs will be accommodated in the 32,000 square-foot historic building and in a new one-story, 3,800 square-foot addition that will infill the existing courtyard on the west side of the building. The primary goal of the Center will be to engage the public on the issue of violence against women and children around the world through education, advocacy and training programs.

BASIS FOR DECISION

Based upon the EA, the Trust determines that the proposed project will not have direct, indirect or cumulative significant impacts on the human environment. The analysis supporting this conclusion is presented in Section 3 (Environmental Impact of the Proposed Project and Alternatives) of the EA. The following summarizes factors considered in this determination.

CULTURAL RESOURCES Completion of a successful tax credit application depends upon satisfying the Secretary of the Interior's Standards for Rehabilitation and a finding of no adverse effect on the historic resource. Years of consultation between Trust design and preservation staff, SHPO, NPS-TPS and FVPP architects have resulted in a project that will meet the highest standards of historic structure rehabilitation.

ARCHAEOLOGICAL RESOURCES The proposed project will not affect any known or previously identified archaeological properties in an unanticipated manner.

BIOLOGICAL RESOURCES The proposed project will not have a measurable adverse effect on any riparian habitat or other sensitive natural community, or any threatened and endangered species. The project site is in a developed area and does not support or provide habitat for any threatened or endangered wildlife species. The proposed project will not interfere with any native resident or migratory species. Furthermore, the project site is not located within or near any riparian habitat, sensitive natural community, or federally protected wetlands.

WATER RESOURCES The proposed project will not substantially increase the amount of water used, or waste water generated within the Presidio. Furthermore, the proposed project will not substantially inhibit surface water drainage, alter the landscape topography (i.e., involve a major change in grade), lead to increased runoff or erosion, or degrade surface or ground water quality. Structural and operational best management practices (BMPs) will be incorporated into the project design during construction and operation to control runoff, minimize discharge to the storm sewer system, protect ground water, and increase onsite water infiltration to the maximum extent practical (including use of a vegetated roof on the courtyard addition).

HAZARDOUS MATERIALS The proposed project will minimize the present and future threat to human health and the environment. Any hazardous materials contained in the buildings and on the project site will be abated in accordance with local, state, and federal environmental laws and standards.

VISITOR EXPERIENCE The proposed project is not expected to adversely impact current or planned visitor services or recreation facilities.

PARKING The proposed project will not greatly increase the demand for parking. Non-exclusive parking spaces will be allocated to the buildings to adequately accommodate the proposed use.

TRAFFIC The proposed project will not substantially increase traffic congestion, traffic volume, or adversely affect traffic safety for vehicles, pedestrians and bicyclists. Vehicular traffic will be about the same or slightly less than traffic levels estimated in the PTMP EIS. The tenant will participate in the Presidio Transportation Demand Management (TDM) program and submit a TDM plan to encourage its employees to use alternative transportation.

AIR QUALITY The proposed project will not substantially increase vehicle emissions or emissions of other air pollutants, or generate significant nuisance dust or odors. Feasible control measures for dust and construction emissions will be implemented to minimize adverse health effects as well as nuisance concerns such as reduced visibility and soiling of exposed surfaces.

NOISE The proposed project will not perceptibly increase the background noise levels or expose people to loud noise. Trust-enforced noise standards that specify conditions, working times, types of construction equipment to be used, and permissible noise emissions will be applied to minimize noise disturbance in the vicinity of the work site during the construction process.

ENERGY AND SOLID WASTE The proposed project will not substantially increase the amount of energy used or waste generated within the Presidio. Water-efficient plumbing fixtures and high-efficiency heating and cooling equipment, lights and appliances will be installed during rehabilitation of the buildings. The buildings will meet or surpass the energy conservation requirements of the current California Title 24 energy code, where these requirements do not conflict with historic preservation objectives. The FVPF will comply with Trust waste management policies, which require tenants to develop a recycling program in conjunction with their activities at the Presidio, and coordinate their recycling program with the Trust.

LIGHT AND GLARE The proposed project will not perceptibly increase light or glare. Additional code-required lights will be high efficiency, low glare, down-cast fixtures per the current California Title 24 code and

LEED V2.2 guidelines for new lighting, and limited to entrances and porches. The new lighting will minimize light trespass from the building and site, reduce the proposed project's impact on the nocturnal environment, and eventually fit into a cohesive design scheme for the Main Post.

VISUAL RESOURCES The proposed project will not block an existing view, be visually intrusive or contribute to a degraded visual condition. Building rehabilitation and restoration of landscape features within the site will enhance the existing visual character of the Main Post and will have a positive effect on its visual integrity. The courtyard addition to Building 100 will not extend beyond the walls of the building's "wings" and will be compatibly scaled (one story in height) to preserve the view from the rear of the building.

GEOLOGIC HAZARDS The proposed project will not increase the threat to public health and safety due to seismic hazards, as the buildings will be seismically upgraded to provide a reasonable level of structural safety for occupants and the public.

FIRE HAZARDS AND CRIME PREVENTION The proposed project will not create or contribute to a fire hazard or increase the demands for fire department or police services. Code-compliant fire protection upgrades will maintain a reasonable degree of fire protection based primarily on the life safety of the occupants and firefighting personnel. Adequate security systems will be installed for crime prevention.

CUMULATIVE IMPACTS The incremental adverse effects associated with the proposed project on cultural resources, archaeological resources, traffic, noise and parking are not expected to be significant. The incremental contribution of the proposed project to the cumulative effect on visitor experience and visual resources within the Main Post will be neutral or beneficial.

REASONS FOR REJECTION OF ALTERNATIVES

The Trust has considered the following factors in choosing not to select the alternatives to the proposed project.

No Project:

This alternative was rejected because it would not meet project needs. Mothballing of the building would only provide sufficient protection for a period of a few years, and would only slow down the deterioration of the building while it remains vacant. The de-activated building would not contribute to the PTMP's public use goal to enliven the Main Post as a community center for a variety of visitor activities. Finally, this alternative would be detrimental to the park's financial welfare, since it would not generate any revenue to help operate the park.

PTMP Uses with No Courtyard Addition:

This alternative was rejected because, after considerable time and effort, no sponsoring organization or other outside source with financial means to make building rehabilitation and reuse economically viable without limited new construction could be identified. This alternative also does not meet the proposed tenant's functional needs to seat 100 people within a large, column-free space for training classes and conferences.

MEASURES TO AVOID OR MINIMIZE POTENTIAL ADVERSE ENVIRONMENTAL IMPACTS

All practicable mitigation measures identified in the EA to avoid or minimize environmental impacts that could result from project implementation will be incorporated into the proposed project. These measures will be monitored and enforced in accordance with the monitoring and enforcement programs (MEPs) provided in the PTMP EIS Record of Decision and in Attachment 1. The Trust's Compliance Manager is responsible for monitoring compliance with the MEPs.

FINDING

The Trust has considered the information and analyses in the environmental assessment and supporting environmental documentation, the comments of agencies and the public, and the project's administrative record. Based on Trust regulations on environmental quality (36 CFR 1010), monitoring and experience, including prior significance determinations documented in previous NEPA decisions, it is the determination of the Trust that the proposed project is not a major federal action having the potential to significantly affect the quality of the human environment. There are no significant adverse effects on public health or safety, properties listed on the National Register of Historic Places, wetlands, endangered or threatened species, or other unique characteristics of park lands. No activities implementing the proposed project will involve resource effects warranting mitigations beyond those that are routinely adopted as conditions of Trust approvals for comparable projects. Implementation of the proposed project will not involve unique or unknown risks, have highly controversial environmental effects, cause loss or destruction of significant park resources, or violate any federal, state, or local law imposed for protection of the environment. Implementation of the proposed project is not precedent-setting nor will it automatically trigger other actions which may require environmental impact statements. Therefore, in accordance with the National Environmental Policy Act of 1969 and regulations of the Council on Environmental Quality (40 CFR 1508.9), an environmental impact statement will not be prepared.

Recommended:

John Pelka Compliance Manager, Presidio Trust	Date
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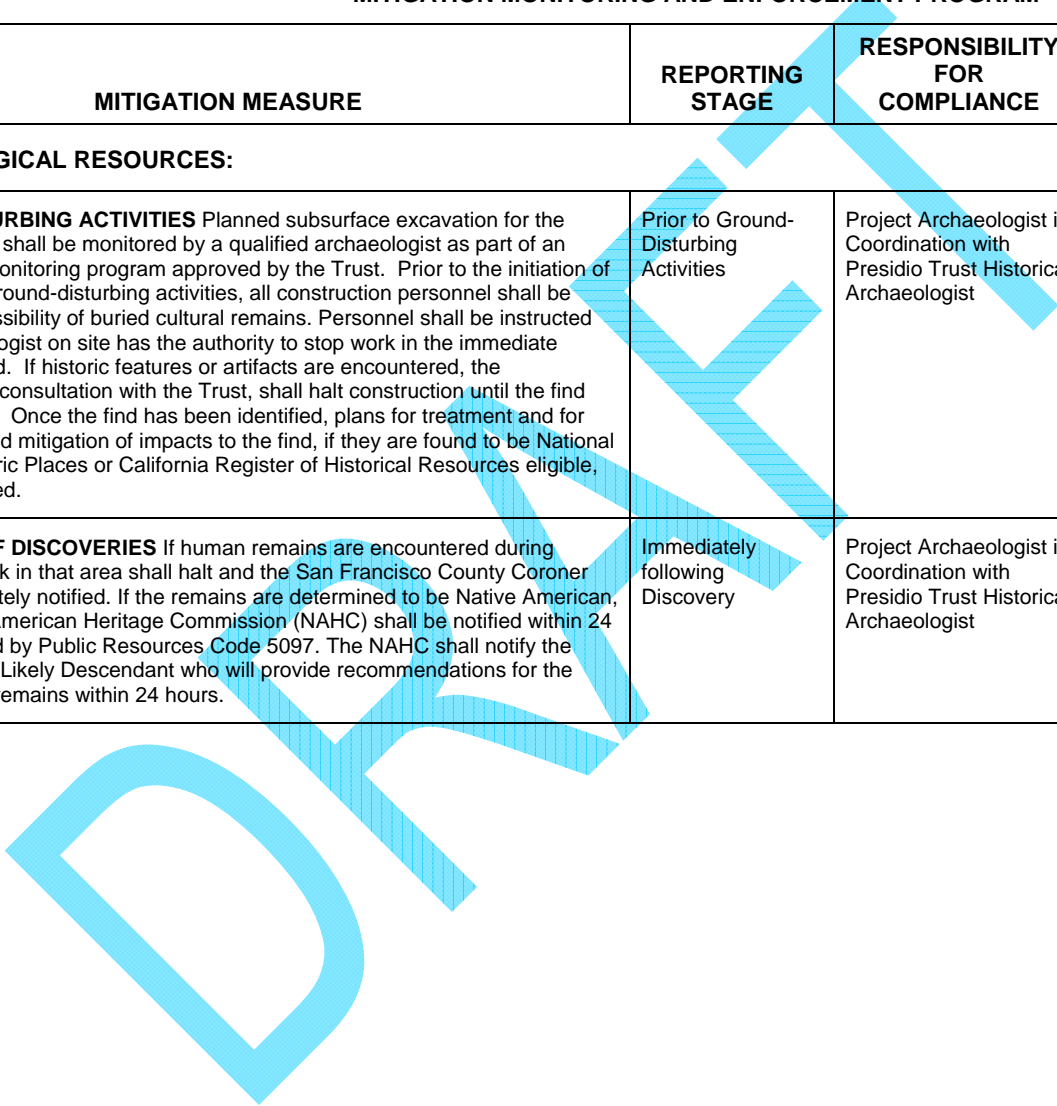
Approved:

Craig Middleton Executive Director, Presidio Trust	Date
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ATTACHMENT 1 MITIGATION MONITORING AND ENFORCEMENT PROGRAM				
MITIGATION MEASURE	REPORTING STAGE	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT
CULTURAL RESOURCES:				
<p>COMPLIANCE WITH STANDARDS FOR BUILDING REHABILITATION All alterations and related building rehabilitation shall comply with the Guidelines for Rehabilitating Buildings at the Presidio of San Francisco, and The Secretary of the Interior's Standards for the Rehabilitation and Guidelines for Rehabilitating Historic Buildings.</p>	<p>Prior to Historic Building Modifications</p>	<p>California Office of Historic Preservation and the National Park Service Office of Technical Services for Historic Preservation Tax Incentives (Presidio Trust Federal Preservation Officer (FPO) in Coordination with Project Historical Architect for all review outside of the formal Historic Preservation Tax Incentive submission process)</p>	<p>Federal Historic Preservation Tax Incentives Submission process (36 CFR 67) / Presidio Trust Preservation and Maintenance Program</p>	<p>Require through Design and Construction Documents and Document in the Project's Administrative Record and Annual Report per PA</p>
<p>COMPLIANCE WITH STANDARDS FOR CULTURAL LANDSCAPE REHABILITATION Historic landscape rehabilitation shall conform to the Secretary of the Interior's Guidelines for the Treatment of Cultural Landscapes, and the treatment recommendation of the 2002 Cultural Landscape Assessment for the Main Post.</p>	<p>Prior to Historic Landscape Rehabilitation</p>	<p>California Office of Historic Preservation and the National Park Service Office of Technical Services for Historic Preservation Tax Incentives (Presidio Trust FPO in Coordination with Project Historical Architect for all review outside of the formal Historic Preservation Tax Incentive submission process)</p>	<p>Federal Historic Preservation Tax Incentives Submission process (36 CFR 67) / Presidio Trust Preservation and Maintenance Program and Grounds Maintenance Program</p>	<p>Require through Design and Construction Documents and Document in the Project's Administrative Record and Annual Report per PA</p>

ATTACHMENT 1 MITIGATION MONITORING AND ENFORCEMENT PROGRAM				
MITIGATION MEASURE	REPORTING STAGE	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT
TRAFFIC AND PARKING:				
TRANSPORTATION DEMAND MANAGEMENT The FVPF shall comply with an approved Transportation Demand Management (TDM) plan designed to reduce demand for parking, and participate in a Main Post parking management program that may, among other policies, charge parking fees	During Project Implementation	Presidio Trust TDM Coordinator in Coordination with Project Employee and Visitor Transportation Coordinator	Presidio Trust Transportation Program	Require as Lease Condition
<p>Note: These mitigation measures were established in the International Center to End Violence Environmental Assessment (EA) or during its review and will be adopted and implemented by the Trust as part of the decision. Refer to Section 3 (Environmental Impact of the Proposed Action and Alternatives) of the EA for a background discussion of the mitigation measures.</p>				
CONSTRUCTION TRAFFIC MANAGEMENT The FVPF's construction contractor shall develop a Construction Traffic Management Plan prior to construction to provide specific routes and other measures to reduce potential conflicts with local and regional traffic, especially from the larger construction vehicles.	Prior to Construction Activities	Project Construction Contractor in Coordination with Presidio Trust Project Manager	Construction Traffic Management Plan	Require as Condition for Construction Permit
HAZARDOUS MATERIALS:				
LEAD AND ASBESTOS REMEDIATION The FVPF's construction contractor shall address asbestos, lead-based paint (LBP) or other hazardous materials in accordance with local, state and federal environmental laws and standards. The FVPF shall submit an Asbestos Plan and LBP Remediation Plan for review and approval by the Trust to ensure that environmental impacts associated with lead and asbestos remediation work are avoided or minimized.	Prior to Construction	Project Contractor in Coordination with Presidio Trust Environmental Remediation Manager	Asbestos Plan and LBP Remediation Plan	Require Asbestos Plan and LBP Remediation Plan as Lease Condition

ATTACHMENT 1 MITIGATION MONITORING AND ENFORCEMENT PROGRAM				
MITIGATION MEASURE	REPORTING STAGE	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT
ARCHAEOLOGICAL RESOURCES:				
<p>GROUND-DISTURBING ACTIVITIES Planned subsurface excavation for the proposed project shall be monitored by a qualified archaeologist as part of an archaeological monitoring program approved by the Trust. Prior to the initiation of construction or ground-disturbing activities, all construction personnel shall be alerted to the possibility of buried cultural remains. Personnel shall be instructed that the archaeologist on site has the authority to stop work in the immediate vicinity of any find. If historic features or artifacts are encountered, the archaeologist, in consultation with the Trust, shall halt construction until the find can be identified. Once the find has been identified, plans for treatment and for the evaluation and mitigation of impacts to the find, if they are found to be National Register of Historic Places or California Register of Historical Resources eligible, shall be developed.</p>	<p>Prior to Ground-Disturbing Activities</p>	<p>Project Archaeologist in Coordination with Presidio Trust Historical Archaeologist</p>	<p>Programmatic Agreement (PA)</p>	<p>Require as Excavation Permit Condition as Stipulated in PA</p>
<p>TREATMENT OF DISCOVERIES If human remains are encountered during construction, work in that area shall halt and the San Francisco County Coroner shall be immediately notified. If the remains are determined to be Native American, then the Native American Heritage Commission (NAHC) shall be notified within 24 hours as required by Public Resources Code 5097. The NAHC shall notify the designated Most Likely Descendant who will provide recommendations for the treatment of the remains within 24 hours.</p>	<p>Immediately following Discovery</p>	<p>Project Archaeologist in Coordination with Presidio Trust Historical Archaeologist</p>	<p>PA</p>	<p>Document in Project's Administrative Record</p>



ATTACHMENT 1 MITIGATION MONITORING AND ENFORCEMENT PROGRAM				
MITIGATION MEASURE	REPORTING STAGE	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT
AIR QUALITY:				
<p>DUST EMISSIONS The FVPF's construction contractor shall implement feasible Bay Area Air Quality Management District (BAAQMD) control measures for dust emissions as appropriate to minimize adverse health effects as well as nuisance concerns such as reduced visibility and soiling of exposed surfaces. Basic control measures are as follows:</p> <ol style="list-style-type: none"> 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 two 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 when necessary (with water sweepers) all paved access roads, parking areas, and staging areas 5 Sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets 	During Project Planning and Construction Activities	Presidio Trust Project Manager in Coordination with Project Construction Contractor	Presidio Trust NEPA Compliance Process	Require as Condition for Construction Permit
<p>CONSTRUCTION EQUIPMENT EXHAUST EMISSIONS The FVPF's construction contractor shall implement U.S. Environmental Protection Agency recommendations to reduce construction equipment exhaust emissions. Measures are as follows: all construction equipment used at the construction site shall:</p> <ol style="list-style-type: none"> 1 Not idle for more than ten minutes 2 Not be altered to increase engine horsepower 3 Be new and clean (1996 or newer) 4 Be staged away from sensitive receptors (Buildings 386 and 387) as well as away from fresh air intakes to buildings and air conditioners 5 Include particulate traps, oxidation catalysts and other suitable control devices 6 Use ultra low sulfur diesel fuel with a sulfur content of 15 parts per million or less or other suitable alternative diesel fuel, unless the fuel cannot be reasonably procured in the geographic area 7 Be tuned to the engine manufacturer's specifications in accordance with a defined maintenance schedule 	During Project Planning and Construction Activities	Presidio Trust Project Manager in Coordination with Project Construction Contractor	Presidio Trust NEPA Compliance Process	Require as Condition for Construction Permit

ATTACHMENT 1 MITIGATION MONITORING AND ENFORCEMENT PROGRAM				
MITIGATION MEASURE	REPORTING STAGE	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT
NOISE:				
CONSTRUCTION NOISE The FVPF's construction contractor and other equipment operators shall comply with Trust-enforced noise criteria, standards and levels set forth in the San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code) to minimize noise disturbance in the vicinity of the project site during the construction process.	During Project Planning and Construction Activities	Presidio Trust Project Manager in Coordination with Project Construction Contractor	Presidio Trust NEPA Compliance Process	Require as Condition for Construction Permit
VISITOR USE:				
BUILDING PANELS AND PHOTOS Story board panels and approximately three to four historic photographs presenting and interpreting the historical significance of Building 100 shall be installed inside and near the front entrance of the building.	During Project Planning	Presidio Trust Historian in Cooperation with Project Exhibit Designer	Presidio Trust NEPA Compliance Process	Require as Condition of the Lease and Document in Project's Administrative Record
PRESIDIO INTERPRETATION PROGRAMS The FVPF shall participate in Presidio interpretation programs for the benefit of the public, whether in concert with the National Park Service (NPS) or otherwise. Such interpretive programs could include tours of the Presidio (including the Center's public areas), exhibitions, and other programs under development to facilitate public understanding of the history, development and current use of the Presidio.	During Project Implementation as Warranted	Presidio Trust Public Programs Manager in Cooperation with Project Events Coordinator and NPS	Presidio Trust NEPA Compliance Process	Require as Condition of the Lease
PUBLIC ACCESS The FVPF shall ensure that the public has constant access to the front porch of Building 100 and walkways and landscaped areas within the project site. The public shall have access to the exhibition area, gift shop and restrooms in Building 104 during business hours.	During Project Implementation	Presidio Trust Project Manager	Presidio Trust NEPA Compliance Process	Require as Condition of the Lease
ENERGY, WATER AND SOLID WASTE:				
ENERGY CONSERVATION The FVPF shall install high-efficiency heating and cooling equipment, lights and appliances during rehabilitation of the building to minimize energy consumption. The buildings shall meet or surpass the energy conservation requirements of the 2001 California Title 24 energy code, where these requirements do not conflict with historic preservation objectives.	During Project Planning	Presidio Trust Architect in Coordination with Project Architect	Presidio Trust Sustainability Program	Require as Building Permit Condition

ATTACHMENT 1 MITIGATION MONITORING AND ENFORCEMENT PROGRAM				
MITIGATION MEASURE	REPORTING STAGE	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT
WATER CONSERVATION The FVPF shall install water-efficient plumbing fixtures and implement other best management practices to encourage water conservation	During Project Planning	Presidio Trust Architect/ Water Conservation Coordinator in Coordination with Project Architect	Presidio Trust Water Supply and Sustainability Program	Require as Building Permit Condition
SOLID WASTE MANAGEMENT The FVPF shall develop and implement a recycling program, including making recycling bins available at all activity sites, setting aside indoor recycling areas, and purchasing products composed of recycled materials to comply with Trust waste management policies.	During Project Planning	Presidio Trust Project Manager / Recycling Coordinator in Coordination with Project Architect	Presidio Trust Solid Waste Management Program	Require as Building Permit Condition
CONSTRUCTION WASTE MATERIALS The Trust shall require that construction and demolition (C&D) must be transported off-site by a registered transporter and take to a registered facility that can process and divert from dumping into a landfill a minimum of 65 percent of the material generated from construction, demolition or rehabilitation, including materials source separated for reuse or recycling.	Presidio Trust Project Manager in Coordination with Sustainability Manager	During Project Planning and Construction Activities	Demolition Debris Recovery Plan	Require as Demolition Permit Condition
LEED REQUIREMENTS The FVPF shall fulfill LEED (Leadership in Energy and Environmental Design) requirements to the extent practicable as listed in the project architect's LEED annotated checklist prepared for the project to improve the quality of the buildings and make a positive impact on public health and the environment.	During Project Planning and Design	Project Architect in Coordination with Presidio Trust Architect	LEED Rating System and Presidio Trust Design Review Process	LEED Project Certification and Document in the Project's Administrative Record
LIGHT AND GLARE:				
ARTIFICIAL LIGHTING The FVPF shall restrict the use of artificial lighting to the building's entrances and porches. Installed lights shall be high efficiency, low glare, down-cast fixtures per the 2001 California Title 24 code and LEED-NC v2.2 guidelines for new lighting.	During Project Planning and Design	Project Architectural Lighting Consultant in Coordination with Presidio Trust Architect	Presidio Trust Design Review Process	Document in the Project's Administrative Record

ATTACHMENT 1 MITIGATION MONITORING AND ENFORCEMENT PROGRAM				
MITIGATION MEASURE	REPORTING STAGE	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT
WATER RESOURCES:				
STORMWATER POLLUTION PREVENTION The project civil engineer shall develop a Stormwater Pollution Prevention Plan (SWPPP) to reduce impervious cover, promote infiltration, and capture and treat stormwater using structural and operational best management practices (BMPs). BMPs shall be designed in accordance with the Trust's stormwater management program.	During Project Planning and Design	Presidio Trust Engineering/Utilities Manager and Natural Resources Program Manager in Coordination with Project Civil Engineer	Presidio Trust NEPA Compliance Process	Incorporate BMPs into SWPPP and Project Plans and Document in Project's Administrative Record
BIOLOGICAL RESOURCES:				
NESTING BIRDS Ornamental shrubs within the project site shall be cut or pruned only outside of bird nesting season (currently March 1 to August 15) unless Trust monitoring indicates nesting birds are not present	During Project Planning and Construction Activities	Presidio Trust Project Manager in Coordination with Natural Resources Program Manager	Presidio Trust NEPA Compliance Process	Incorporate Measure into Project Plans and Document in the Project's Administrative Record
INVASIVE SPECIES When selecting plants for landscaping plant species that can escape landscaped areas and invade native plant communities and other areas shall be avoided. The Trust's lists of approved and prohibited plant material for consideration in designed landscapes shall be reviewed in plant selection. Plants that may be considered for planting and not found on the lists shall be evaluated by qualified Trust staff specialists to determine their degree of invasiveness, and whether they can be successfully controllable to limit substantial impacts on park resources.	During Project Planning and Construction Activities	Presidio Trust Project Manager in Coordination with Natural Resources Program Manager	Presidio Trust NEPA Compliance Process	Incorporate Measure into Project Plans and Document in the Project's Administrative Record
CLIFF SWALLOWS If construction is proposed during the breeding season of the small colony of Cliff Swallows that has been known to nest on the Montgomery Street barrack buildings, no earlier than three days before the start of work, a qualified wildlife biologist shall survey for the presence of swallows at and within the immediate vicinity of the planned work. If active nests are present, the project shall be redesigned or project timeline modified in accordance with the biologist's recommendations to avoid take. If avoidance is not feasible, the USFWS shall be consulted under the Migratory Bird Treaty Act.	No Earlier than Three Days before Start of Work	Presidio Trust Project Manager in Coordination with Natural Resources Program Manager	Presidio Trust NEPA Compliance Process	Incorporate Measure into Project Plans and Document in the Project's Administrative Record

ATTACHMENT 1 MITIGATION MONITORING AND ENFORCEMENT PROGRAM				
MITIGATION MEASURE	REPORTING STAGE	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT
BATS Prior to construction, the buildings shall be visually investigated by qualified personnel to determine if bats are using the structure for roosting. Should any sign of bats be identified, recommendations shall be made on how to minimize / mitigate any impacts to the bat population.	Prior to Construction Activities	Presidio Trust Project Manager in Coordination with Natural Resources Program Manager	Presidio Trust NEPA Compliance Process	Incorporate Measure into Project Plans and Document in the Project's Administrative Record
FIRE HAZARDS AND CRIME PREVENTION:				
LIFE-SAFETY Prior to building rehabilitation, the FVPF shall submit construction documents and shop drawings for review and approval by the Presidio Fire Department fire inspector as part of a life-safety evaluation. Construction documents shall include all fire prevention requirements for the proposed use, including an automatic fire-extinguishing (i.e., sprinkler) system and fire alarm systems. Shop drawings and equipment specifications shall comply with the requirements of the National Fire Protection Association (NFPA) Fire Codes and Life Safety Codes and the Presidio Trust Tenants Handbook. Preservation of the integrity of the historic building shall be effectively integrated with fire management through the use of "minimum impact" techniques. The Presidio Fire Department fire protection inspectors will issue permits once requested submittals have been reviewed and approved, inspect construction in progress, and provide life safety inspection of subsequent occupancy and public education to reduce fire loss.	Prior to Building Rehabilitation and During Occupancy	Presidio Trust Project Manager in Coordination with Presidio Fire Department Fire Protection Inspector and Project Fire Consultant	Presidio Fire Department Life-Safety Evaluation and Inspection Process	Require as Building and Fire Permit Conditions
SECURITY The FVPF shall submit construction documents and shop drawings to the U.S. Park Police (USPP) for security code compliance and installation of adequate security systems.	Prior to Building Rehabilitation	Presidio Trust Project Manager in Coordination with USPP and Project Security Consultant	USPP Security Code Compliance Process	Require as Building Permit Condition



Source: Presidio Trust 2006



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