

Record of Decision  
Final Supplemental Environmental Impact Statement

*The Public Health Service Hospital  
at the Presidio of San Francisco*





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# Record of Decision

## Final Supplemental Environmental Impact Statement

### Public Health Service Hospital, The Presidio of San Francisco, CA

In accordance with the Presidio Trust Act (Trust Act), as amended (16 U.S.C. 460bb appendix), and as guided by the Presidio Trust Management Plan (PTMP), the Presidio Trust (Trust) is proposing to rehabilitate and reuse buildings within the 42-acre Public Health Service Hospital (PHSH) district of the Presidio, to re-introduce residential uses to the district, and to undertake related site improvements. These actions represent the proposed action evaluated in the Final Supplemental Environmental Impact Statement (SEIS) for the Public Health Service Hospital at the Presidio of San Francisco. The Trust has prepared this record of decision (ROD) for the final SEIS. The final SEIS is a supplement to and tiers from the final environmental impact statement for the PTMP. The Trust developed this ROD in compliance with agency decision-making requirements under the National Environmental Policy Act of 1969 (NEPA) as amended (42 U.S.C. 4321 et seq.), NEPA's implementing regulations promulgated by the Council on Environmental Quality (CEQ) (40 C.F.R. 1500 et seq.), and the Trust's policies and procedures on environmental quality and control (36 C.F.R. 1010).

The ROD documents the decision and rationale for selecting a proposed development alternative within the district. The document is a statement of the decision, alternatives considered, the nature of public involvement, and mitigating measures developed to avoid or minimize environmental impacts. Based upon public comments received on the August 2004 draft SEIS for the PHSH, the Trust made appropriate changes to the text and in May 2006 released the final SEIS. The Trust's responses to the comments can be found in the Response to Comments volume of the final SEIS. The Trust also heard comments at a public meeting in June 2006 following public review of the final SEIS, reviewed additional letters received during the 30-day wait period for the final SEIS, and conducted public workshops in November 2006 following the wait period.

## 1 BACKGROUND

### THE PRESIDIO OF SAN FRANCISCO

The 1,491-acre Presidio of San Francisco (Presidio) is one of the country's most beautiful places. Its distinctive resources include historic architecture and landscapes, unique ecological systems and rare plant communities, inviting parklands, an open shoreline, spectacular views, and varied recreational resources. Situated within the San Francisco Bay Area at the center of the 77,000-acre Golden Gate National Recreation Area (GGNRA), the Presidio attracts visitors from near and far.

A military garrison since 1776, the Presidio was designated a National Historic Landmark District (NHLD) in 1962. The Presidio contains one of our country's finest collections of military places, buildings, structures, and artifacts; its architecture represents every major period of U.S. military history since the 1850s. Archaeological evidence of Native American inhabitants and early Spanish and Mexican encampments complements this rich architectural heritage.

The Presidio's 770 buildings total approximately 6.1 million square feet (sf) and include an array of offices, warehouses, workshops, and residences. Over 450 buildings are historic and contribute to the Presidio's NHLD designation. Residential structures include large single-family homes and duplexes, as well as apartment complexes and barracks. The Presidio has facilities and amenities that serve residents, park visitors, and non-residential tenants, including a mix of non-profit and for-profit organizations. The Presidio has its own electric distribution, telecommunication, water, wastewater collection, storm drain, and refuse collection systems and services. The Trust also operates a park shuttle to supplement local and regional transit services.

Dramatic headlands, a favorable climate, unique soils, water resources, and protected open space have contributed to the Presidio's rich biological diversity. Remnant native plant communities preserve rare and endangered plant species and provide valuable wildlife habitat. In addition, the magnificent 300-acre Presidio forest defines the Presidio and sets the park apart from the adjacent city. A planned system of trails, bikeways, and overlooks will improve the visitor experience and enhance recreational opportunities while protecting the park's natural resources.

#### FROM MILITARY POST TO NATIONAL PARK

The Presidio's transition from military post to national park began in 1972 when Congress provided that the Presidio would become part of the GGNRA if the military ever declared the post excess to its needs. Congress designated the Presidio for closure in 1989, and in 1994 the U.S. Army transferred jurisdiction over the Presidio to the National Park Service (NPS).

In 1994, during the transition from post to park, the NPS adopted a plan for the Presidio's use and management known as the General Management Plan Amendment (GMPA). As part of the GMPA, the NPS prepared the Presidio Building, Leasing and Financing Implementation Strategy, which estimated annual operating costs to be \$40 million and capital improvements to be in excess of \$500 million. According to the NPS plan, these costs would be funded by a combination of leases and operating agreements, U.S. Treasury and/or private sector resources, a continuing annual congressional appropriation of between \$16 and \$25 million, and philanthropic funds. The GMPA cost estimates indicated that the Presidio was very expensive to manage, particularly in the context of the national park system. It soon became apparent that these costs were far more than Congress was willing to support over time. Congress therefore created a new agency charged with improving, protecting, and maintaining the Presidio by using the park's built resources to generate revenue to support the park.

## THE PRESIDIO TRUST AND ITS MANDATE

In 1996, Congress passed the Trust Act and established the Trust, which assumed jurisdiction over the interior 1,100 acres of the Presidio (Area B) on July 1, 1998; the NPS retains control over the coastal areas (Area A). Congress also directed the Trust to become financially self-sufficient by 2013, at which time annual federal appropriations will end.

Congress provided the Trust with the necessary tools to achieve its mission. The Trust is a wholly owned federal government corporation that may generate and retain revenue, lease real property within Area B, make loans, and provide loan guarantees to encourage the use of non-federal funds by third parties to invest in the repair and rehabilitation of the Presidio's historic buildings and infrastructure.

The Trust is governed by a seven-person Board of Directors appointed by the President of the United States. Six members are private citizens and the seventh is the Secretary of the Interior or the Secretary's designee. The Trust is managed by an executive director and a professional staff with expertise in real estate leasing, finance, development, property management, park stewardship, and natural and cultural resource protection and management.

Since the Trust began operations in 1998, the budget needed to operate, maintain, and enhance the park has borne out the initial estimates of the high costs and complexity of managing the Presidio. The Trust has focused on upgrading the Presidio's aging infrastructure and reusing the Presidio's housing, its most reliable source of revenue. The Trust has also recognized the need to capitalize on a strong real estate market by negotiating long-term leases for several key buildings. In 1998, the Trust began the process to lease a 23-acre site in the Presidio's Letterman district, and in 2002 signed a lease with Letterman Digital Arts Ltd. (LDA) to redevelop the obsolete Letterman Hospital and research center as a digital arts campus.

In August 2002, after two years of extensive planning, agency and public input, and public review, the Trust adopted a new management plan for Area B. The Presidio Trust Management Plan provides a general policy framework that balances the preservation of park resources with building uses that support both the financial needs of the park and the goal of serving the public. The PTMP also emphasizes that the Trust's financial challenge cannot be understood apart from the mandate to preserve and enhance the park. The financial goals and requirements are not an end in itself, but rather the means to achieve the goal of preserving historic, natural, scenic and recreational resources.

The Trust must attract tenants and investors with the capacity and expertise to assume the substantial costs of rehabilitating and reusing key Presidio buildings. While preparing the PTMP, the Trust did not undertake any long-term leases. Once the PTMP was adopted, the Trust resumed long-term leasing, which is critical to the Trust's ability to rehabilitate its historic structures and to meet its congressionally set financial goals. To that end, the Trust must continue to negotiate long-term leases that are beneficial both to investors and to the park.

## THE PRESIDIO'S PUBLIC HEALTH SERVICE HOSPITAL DISTRICT

The PHSH district is situated on a gentle north-south ridge at the Presidio's southern boundary, overlooking the city and remote from other developed areas of the Presidio. The PHSH evolved as a separate entity, first under the administration of the U.S. Marine Hospital Service and then under the U.S. Public Health Service. The site, originally selected for development in the 1870s because of its proximity to Lobos Creek and Mountain Lake, has been developed into two plateaus, with most of the existing development located on the lower plateau. The district contains 17 buildings, the largest of which is Building 1801, the historic (c. 1932) 170,000 square-foot main hospital building with its 128,000 square-foot non-historic (c. 1952) "wings." The hospital closed in 1980 and has remained essentially unoccupied, as have most of the support buildings within the PHSH district. Today, the dilapidated and vacant buildings pose both a land use and an aesthetic concern, and their abandoned appearance is incompatible with the park setting.

The PTMP presented the planning concept for the PHSH district as a Residential and Educational Community, including rehabilitation of Building 1801 for residential use, if feasible, and rehabilitation and reuse of the other historic structures within the district. Possible development in the PHSH district was "capped" at 400,000 sf, meaning that there could be no increase in square footage over existing conditions. However, the PTMP permits a maximum of 130,000 sf of building demolition and up to an equivalent amount of replacement construction. The PTMP permitted but did not call for removal of the non-historic wings of Building 1801. Also, under the PTMP, removal of the historic Building 1801 could be considered in future planning only if it was infeasible to retain it.

## 2 ALTERNATIVES CONSIDERED IN FINAL SEIS

The Trust specified six project objectives for developing alternatives for the PHSH. The six objectives, to be met in balance with one another, are preserving historic resources, revitalizing the PHSH district, limiting traffic and parking demand, enhancing the financial viability of the Presidio, adhering to design quality and environmental sustainability, and protecting natural resources. Some of the objectives were drawn directly from Trust Act requirements and others reflected the land use plan and policies set forth in the PTMP (see PTMP, Chapter Four – Plan Implementation). The Trust identified these same objectives in the Request for Qualifications (RFQ) and Request for Proposals (RFP) issued to select a private development partner / master tenant for the PHSH project. Section 1 of the final SEIS provides more detail on these objectives and the project purpose and need.

The final SEIS evaluated five project alternatives, with each alternative proposing different treatments for Building 1801 and different amounts of demolition and replacement construction within the PHSH district. All five alternatives were developed and modified with the benefit of public input throughout the course of the PHSH environmental review process, as described in Section 4.1, Concurrent Leasing and Environmental Review Process, in the final SEIS. An alternative to remove Building 1801 was not considered as the building's rehabilitation and reuse has been deemed feasible, and its demolition would not fulfill the Trust's historic preservation objective. The reasons for rejecting this alternative and other



alternatives requested by the public that fell within the range represented by the five alternatives considered are described in Section 2.8, Other Alternatives. The five alternatives considered are summarized in Table 4 of the final SEIS, and are as follows.

#### REQUESTED NO ACTION ALTERNATIVE

The Requested No Action Alternative was added in response to public comments on the February 2004 Environmental Assessment for the PHS, and assumed that the project would not be implemented. It would limit leasing to those buildings or portions of buildings that have been recently occupied, specifically Buildings 1802, 1803, 1805, 1806, 1808 and 1450. No additional building rehabilitation, construction, or demolition would occur, and no residential use would be introduced to the PHS district. Other buildings would remain vacant and would be protected from weather and vandalism as funding permits. The gross square footage of occupied buildings would be about 68,000 sf.

#### ALTERNATIVE 1: PTMP ALTERNATIVE

Alternative 1, the PTMP Alternative, is the legally required “no action” alternative under the NEPA. It reflects the Trust’s adopted management plan as analyzed in the PTMP Final EIS. All existing buildings on the site would be rehabilitated for a mix of educational and residential uses, and no new construction or demolition would occur. The gross square footage of occupied buildings would total about 400,000 sf, and 210 dwelling units would be provided in combination with 190,000 sf of other (mostly cultural/educational) uses.

#### ALTERNATIVE 2: WINGS RETAINED ALTERNATIVE

Alternative 2, the Wings Retained Alternative (and the Trust’s “preferred alternative” as identified in the final SEIS), would rehabilitate the historic buildings on the site as well as the non-historic wings of Building 1801 for residential use with limited demolition and new construction (32,000 sf). The gross square footage of occupied buildings would total about 400,000 sf, and up to 230 dwelling units would be provided in combination with about 67,000 sf of other uses.

#### ALTERNATIVE 3: WINGS REMOVED ALTERNATIVE

Alternative 3, the Wings Removed Alternative, would remove the non-historic wings of Building 1801 together with other non-historic buildings and additions, and it would rehabilitate the historic buildings on the site for residential use. The gross square footage of occupied buildings would total about 275,000 sf, and up to 230 dwelling units would be provided in combination with about 42,000 sf of other uses.

#### ALTERNATIVE 4: BATTERY CAULFIELD ALTERNATIVE

Alternative 4, the Battery Caulfield Alternative, would rehabilitate the historic buildings on the site for residential use, remove Building 1801’s non-historic wings as well as other non-historic buildings and additions, and construct new residential buildings at Battery Caulfield. The gross square footage of

occupied buildings would total about 362,000 sf, and up to 269 dwelling units would be provided in combination with about 30,000 sf of other uses. A total of 155 of the 269 dwelling units would be age-restricted senior or assisted living units.

### **3 TRUST RECORD OF DECISION ON BUILDINGS 1809-1815**

The Trust adopted a ROD to rehabilitate Buildings 1809-1815 (Wyman Avenue residences) for residential use which was part of the proposed action analyzed in the final SEIS. That ROD documented the rationale for proceeding with the rehabilitation and reuse action while a further decision on the remaining buildings within the PSHH district as analyzed in the final SEIS was pending.

### **4 TRUST DECISION TO ADOPT MODIFIED ALTERNATIVE 3 (SELECTED ACTION)**

Based upon a thorough analysis of the alternatives and their potential environmental consequences, consideration of all public and agency participation and concerns raised during the NEPA process, and consideration of the mandates of the Trust Act together with the plan set out in the PTMP, the Trust has determined to adopt a modified version of Alternative 3 (Modified Alternative 3) for implementation. Under Modified Alternative 3, the gross square footage of occupied buildings will total approximately 332,000 sf. The historic buildings in the PSHH district will be rehabilitated and the non-historic wings of Building 1801 will be removed together with other non-historic buildings and additions. Up to 133,000 sf will be demolished and new construction consisting of up to 35,000 sf at the rear of Building 1801 as analyzed in Alternative 2 and a 16,000 square-foot building on Belles Street on the “central green” as analyzed in Alternative 4 may occur. Up to 186 dwelling units<sup>1</sup> will be provided in combination with approximately 76,000 sf of other uses, including offices and cultural/education. Modified Alternative 3 falls within the range of alternatives compared in the final SEIS and does not give rise to any new impacts that have not been previously analyzed. Features of Modified Alternative 3 are shown in attached Figure 1. A comparison of the alternative with the two other alternatives that have been the focus of recent public discussion (Alternatives 2 and 3) as analyzed in the final SEIS is provided in attached Tables 1 and 2.

### **5 REASONS FOR THE DECISION**

The Trust has selected the alternative that best fulfills the purpose and need outlined in Section 1 of the final SEIS, and acknowledges the public’s contributions and concerns. The selected alternative also is responsive to the Trust’s mission to preserve and enhance the Presidio as an enduring resource for the American public, as well as its statutory requirement to make the Presidio financially self-sufficient. Additionally, as described below, Modified Alternative 3 best balances the Trust’s objectives while enhancing its financial viability and minimizing or avoiding adverse environmental impacts.

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<sup>1</sup> Includes 11 units in Buildings 1809-1815 (Wyman Avenue residences).

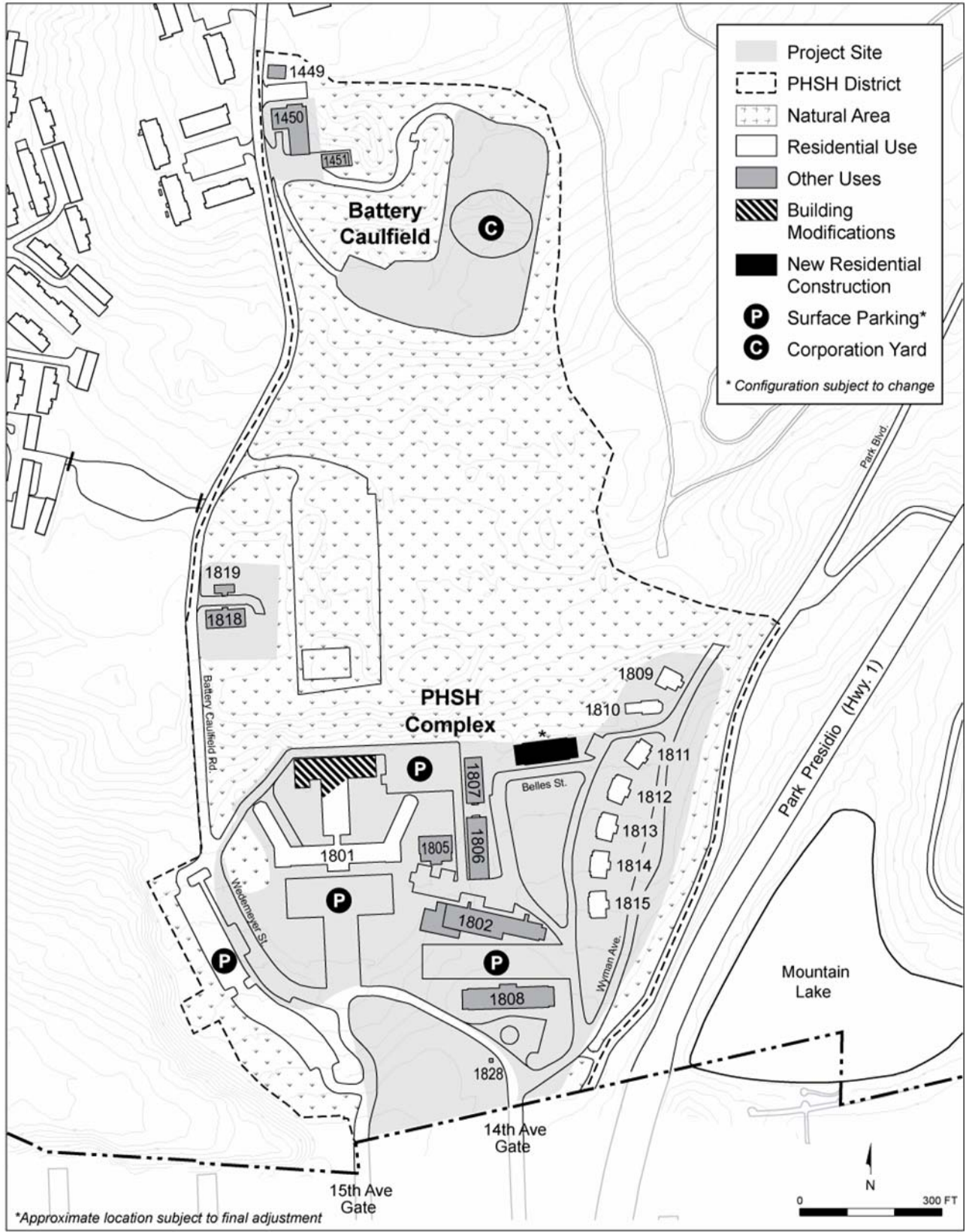


FIGURE 1. MODIFIED ALTERNATIVE 3: WINGS REMOVED / TRUST SELECTED ALTERNATIVE

Source: Presidio Trust, 2007

Table 1. Comparison of Alternatives

	ALTERNATIVE 2: WINGS RETAINED ALTERNATIVE / FINAL SEIS PREFERRED ALTERNATIVE	ALTERNATIVE 3: WINGS REMOVED ALTERNATIVE	MODIFIED ALTERNATIVE 3: WINGS REMOVED / TRUST SELECTED ALTERNATIVE
Preservation of Historic Portion of Building 1801 and other Historic Buildings	Yes	Yes	Yes
Removal of Non-Historic “Wings” of Building 1801	No	Yes	Yes
Maximum Building Area	400,000 sf	275,000 sf	332,000 sf
Proposed Uses within PHSB Complex on Lower Plateau	Residential (up to 217 units <sup>a</sup> ) & Other Uses (65,000 sf)	Residential (up to 230 units <sup>a</sup> ) & Other Uses (25,000 sf)	Residential (up to 186 units <sup>a</sup> ) & Other Uses (59,000 sf)
Proposed Uses within Battery Caulfield and Existing Buildings <sup>b</sup> on Upper Plateau	Maintenance/Corporation Yard (Existing Use), Residential (up to 13 units) & Other Uses (2,000 sf) within Existing Buildings	Maintenance/Corporation Yard (Existing Use) & Other Uses (17,000 sf) within Existing Buildings	Maintenance/Corporation Yard (Existing Use) & Other Uses (17,000 sf) within Existing Buildings
Parking Spaces	452	330	400
Maximum Demolition	32,000 sf	125,000 sf	133,000 sf
Maximum New Construction	32,000 sf	0	51,000 sf
Maximum Dwelling Units	230	230	186
Average Unit Size <sup>c</sup>	1,025 sf	699 sf	962 sf

Source: Presidio Trust 2007.

<sup>a</sup> Includes 11 units within Buildings 1809-1815 (Wyman Avenue residences)

<sup>b</sup> Includes Buildings 1818, 1819 and 1450

<sup>c</sup> Rentable square feet

Notes:

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.

sf = square feet

Other Uses = Mix of office/accessory uses and cultural/education-related uses. Includes the retention of some existing tenants and Trust facilities

Table 2. Housing and Daytime Population Projections & Estimated Trip Generation

	ALTERNATIVE 2: WINGS RETAINED ALTERNATIVE / FINAL SEIS PREFERRED ALTERNATIVE	ALTERNATIVE 3: WINGS REMOVED ALTERNATIVE	MODIFIED ALTERNATIVE 3: WINGS REMOVED / TRUST SELECTED ALTERNATIVE
<b>Dwelling Units</b>			
Studios & 1 BR	109	218	112
2+ BR	<u>121</u>	<u>12</u>	<u>74</u>
<i>Total</i>	230	230	186
<b>Bedrooms</b>			
<i>Total</i>	367	253	283
<b>Daytime Population</b>			
Residents	489	379	372
Employees	138	20	132
Students	<u>89</u>	<u>89</u>	<u>89</u>
<i>Total</i>	716	488	593
<b>Vehicle Trips</b>			
Daily	1,725	1,542	1,520
AM Peak Hour	187	161	167
PM Peak Hour	202	189	182
PM Peak Hour through the 14 <sup>th</sup> & 15 <sup>th</sup> Avenue Gates	310	310	300
PM Peak Hour through the 14 <sup>th</sup> & 15 <sup>th</sup> Avenue Gates w/ Restrictions on Battery Caulfield Road <sup>a</sup>	140	140	130

Source: Presidio Trust 2007.

<sup>a</sup> Restrictions on Battery Caulfield Road would allow passage by PHS complex traffic only.

Notes:

Derived from PTMP EIS assumptions regarding employment density, housing demand, and the percentage of the residential population that is school-age (12.2%).

Household size = 2.6 persons per 2+BR unit and 1.6 persons per studio/1BR unit

School enrollment = existing Lone Mountain enrollment

BR = bedrooms

## HISTORIC RESOURCES

Proposed building rehabilitation and reuse as well as rehabilitation of the cultural landscape under Modified Alternative 3 will protect the integrity of the main hospital and meet the Trust's National Historic Preservation Act obligations. Historic portions of Building 1801 will be rehabilitated in accordance with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Standards) and the non-historic lobby, loggia, and wings will be removed. Removal of this non-historic addition from the front of Building 1801 will reveal the historic façade of the main hospital and recover one of the most important character defining elements of the structure.<sup>2</sup> These changes will be beneficial for the historic architectural resources by reinforcing the period of greatest significance in the operation of the 1932 hospital complex. Building modifications at the back of Building 1801 will be compatible in scale, massing and design. The new construction above Belles Street will maintain the "central green" west of the Wyman Avenue residences as a remnant of the 19<sup>th</sup> century road network and a defined open space. By fitting onto a compact site close to existing buildings, the new building will reinforce the district's campus-like setting while not detracting from its historic significance. Other historic buildings (Buildings 1805-1815, 1818 and 1819, and 1828) in the PHS district will be rehabilitated consistent with the Secretary of the Interior's Standards. Non-historic Building 1803 will be demolished.

## REVITALIZATION AND REUSE

Modified Alternative 3 will rehabilitate and reactivate the severely deteriorated historic buildings within the PHS district, particularly the main hospital building. Rehabilitation and reuse of the dilapidated and largely vacant buildings will address health and safety risks to the Presidio and surrounding city neighborhoods, including break-ins, unauthorized use and related crime. Occupancy of the buildings will also protect them from deterioration as well as graffiti, other forms of vandalism, and destruction of historic materials. The increase in activity levels within the district and improved security will allow improvements such as trails, trailheads and scenic overlooks, interpretive signs, natural areas and landscaping to enhance public enjoyment of the site. Points of interest and interpretive opportunities that include wayside displays, walking tours, and exhibits related to the ecology and history of the site will now be feasible.

## TRAFFIC AND PARKING

The expected increase in traffic under Modified Alternative 3 will not contribute significantly to the deterioration of environmental conditions that will result from expected growth in regional population and employment. Modified Alternative 3 will result in 12 percent fewer daily, 11 percent fewer AM peak hour and 10 percent fewer PM peak hour vehicle trips than Alternative 2, the previously preferred

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<sup>2</sup> Construction methods for the 1952 addition included a 12-inch wide gap between the addition and the main body of Building 1801 thus encapsulating and leaving untouched the majority of the materials of the 1932 façade. Restoration of historic materials on the façade will only be required in isolated areas such as the cornice and corridor connections between the buildings.

alternative (see Table 2). Modified Alternative 3 will result in approximately the same number of daily, AM peak hour and PM peak hour vehicle trips as Alternative 3 as analyzed in the final SEIS. All study intersections will operate at the same or at better levels of service (LOS) compared to Alternative 2. Modified Alternative 3 will not substantially affect anticipated traffic congestion given the roadway capacity in the surrounding area. It also will result in 21 percent lower peak period parking demand (259 spaces) than Alternative 2 (327 spaces). Modified Alternative 3 will provide a parking supply sufficient to meet demand, and the Trust will require tenants in the district to implement aggressive transportation demand management measures that will limit such demand.<sup>3</sup> The Trust will undertake measures to discourage traffic not destined for the PHS district from passing through the area, including considering restrictions on Battery Caulfield Road to allow passage by PHS district traffic only, and will institute traffic-calming techniques to slow traffic through the district.

## FINANCIAL CONTRIBUTION

Compared to the other alternatives, Modified Alternative 3 will not generate the highest financial return nor will it pose the least risk of financial failure. Modified Alternative 3 will require an initial investment of \$92 million, and is estimated to generate a minimum of \$0.58 million in annual base rent from the master tenant, \$2.0 million in direct rent from users, and \$0.92 million in SDC<sup>4</sup> for a total \$3.52 million in revenue to the Trust in 2010, the first “stabilized” year of project operation. This represents approximately 6.6 percent of the Trust’s operating budget in 2010. Over a 70-year lease term, the alternative will generate approximately \$666.7 million in total revenue to the Trust. Under Modified Alternative 3, the Trust will take on a large portion of the project in order to receive greater revenue with fewer housing units. The Trust will be responsible for managing and leasing all existing buildings within the district with the exception of Building 1801, for which it will retain oversight authority. Total costs for the project will be allocated between the Trust (approximately \$20.2 million) and the master tenant (approximately \$71.8 million).<sup>5</sup>

## DESIGN QUALITY AND ENVIRONMENTAL SUSTAINABILITY

Modified Alternative 3 will protect historic buildings and landscapes within the district and will facilitate design excellence. Removal of Building 1801’s wings will open the “foreground” of the building, substantially improving the building’s visual integration with the neighborhood. Reducing the main hospital building in size by removing the wings will enhance the visual continuity of the historic structure

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<sup>3</sup> See Mitigation Measure TR-22 *TDM Program Monitoring* on page A-2 in Attachment A of this ROD.

<sup>4</sup> The SDC is a pass-through of a portion of Presidio operating expenses (e.g., police, fire, road and other infrastructure maintenance) that are not directly associated with revenue-generating buildings. Tenants are charged a pro rata portion of such costs based on the relationship of the space leased to the total square footage within Area B of the Presidio (currently estimated to be 5.42 million rentable sf).

<sup>5</sup> Financial assumptions are based on a financial model that take into account best available estimates of project size, lease term, project financing, and income potential of residential units of various sizes to compare revenues generated by the various alternatives. However, the numbers may not reflect the actual financial terms and revenue spelled out in development and/or lease agreements negotiated for the project and therefore should not be interpreted as controlling future implementation actions of the Trust.

and result in a visual scale more appropriate to the surrounding neighborhoods. Removal of the building's wings will also reduce artificial light in the area, an objective identified in the PTMP and a matter of concern raised by the neighbors. Scenic and historic views into and out of the district will be preserved and enhanced. The appearance of the existing unimproved landscapes within the project boundary will be improved. Adequate buffers and visual screening will limit the visual impact on the neighborhood. Tree stands will create the visual screen, and small-scale design elements will accentuate a residential setting. The alternative will incorporate sustainable development and building practices, including "green" design with the goal of achieving LEED (Leadership in Energy and Environmental Design) certification. Potential LEED technologies will include energy conservation and efficiency strategies, indoor environmental and air quality management, and resource efficiency practices such as construction waste management, storm water management, and water-efficient irrigation systems. Studio and 1- to 2-bedroom units are in highest demand for Presidio-based employees. The greater number of smaller units within Modified Alternative 3 is responsive to the need for such housing in the Presidio.

## NATURAL RESOURCES

Modified Alternative 3 will restrict demolition and building rehabilitation activities to developed sites, and will not entail new construction at Battery Caulfield.<sup>6</sup> Therefore, no direct impacts to the local quail population, wetland habitat, the rare dune annual habitat (including the federally endangered San Francisco lessingia) and the oak woodland habitat within the district are expected. The relatively low number of residents would have less potential for adverse indirect impacts on native plant communities, habitat or individual populations of special-status species. Implementation of the natural resources (NR) mitigation measures identified in Attachment A and partial closure of Battery Caulfield Road would further reduce potentially adverse indirect impacts on biological resources near the project site.

## 6 TRUST DECISION ON THE PARK PRESIDIO BOULEVARD ACCESS VARIANT

The Trust studied the Park Presidio Boulevard Access at the request of the neighborhood organizations as part of the SEIS transportation analysis. The Park Presidio Boulevard Access Variant would entail a new signalized intersection approximately 400 feet north of the current intersection of Lake Street and Park Presidio Boulevard. The new intersection was presented as a variant in the SEIS, rather than as a part of any alternative because the decision to allow the new intersection ultimately lies with the California Department of Transportation (Caltrans). Furthermore, because the intersection would not cause the operation of any key intersection at which there is a significant impact to improve from an unacceptable level of service to an acceptable level of service, it does not constitute a mitigation measure under NEPA.

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<sup>6</sup> The U.S. Fish and Wildlife Service (USFWS) observed: "Construction and other project related activities in the Battery Caulfield area could indirectly affect lessingia populations by altering local surface water and groundwater flows, by releasing irrigation water and/or fertilizers, and by increasing the spread of non-native invasive plants. Increased presence of people in the Battery Caulfield area may lead to increased trampling of lessingia, particularly if off-trail use between Battery Caulfield and the PSHS complex were to increase" (USFWS comment letter on the draft SEIS, dated October 26, 2004, provided on pages 87-88 in the Response to Comments volume of the final SEIS).



The SEIS transportation analysis showed that the traffic projected for any of the alternatives analyzed would not substantially impact traffic congestion at key intersections and that the variant therefore would not significantly improve traffic conditions at key intersections.

As early as June 1999, the Trust submitted documentation to Caltrans for alternative connections to Park Presidio Boulevard from the PHSB complex, exceptions to mandatory and advisory design standards, documentation of traffic accident history of the area, and traffic signal warrants analysis. Since 1999, Caltrans has questioned the need for any sort of connection to Park Presidio Boulevard. With the release of the final SEIS in May 2006, the Trust revised Alternative 2, then the preferred alternative, to reduce the number of dwelling units and to install more restrictive traffic calming devices on the site. With the Trust's selection of the even less dense Modified Alternative 3, the daily traffic generated by the project has decreased further and it does not meet any of the Caltrans signal warrants for planned intersections.

At this time, Caltrans continues to reserve judgment as to whether it would approve a new intersection on Park Presidio Boulevard. However, with none of the planning signal warrants being met, it is unlikely Caltrans would approve a signalized Park Presidio Boulevard Access intersection. Given the reduced density of the project, Caltrans' initial findings have even greater applicability:

*...[w]e question the overall benefit of the new access from the hospital to Park Presidio Boulevard. Granted, residents who live in proximity to the hospital are naturally concerned about the potential traffic generated by the proposed development. However, we find it difficult to see any justification for disrupting the travel of current Park Presidio Boulevard users in order to accommodate the relatively small amount of traffic generated by the proposed development, especially with exiting ingress and egress that is likely to be functionally adequate to meet the traffic needs of the development.<sup>7</sup>*

The Trust has decided not to pursue the Park Presidio Boulevard Access Variant with Caltrans. The Trust will, however, consider ways to discourage traffic traveling to and from the Golden Gate Bridge, such as restricting access along Battery Caulfield Road to residents of the lower plateau of the PHSB district, emergency vehicles, and PresidiGo shuttle buses. The partial closure of Battery Caulfield Road would reduce vehicle trips through the 14<sup>th</sup> and 15<sup>th</sup> Avenue gates by more than half (see Table 2), resulting in a similar reduction in traffic through the gates as the Park Presidio Boulevard Access Variant (compare Table 2 with Table 15 on page 123 in the final SEIS). Furthermore, in addition to reducing traffic on the two blocks immediately south of the gates, it would reduce traffic volume through important wildlife communities on the upper plateau as well as within the West Washington residential neighborhood.<sup>8</sup>

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<sup>7</sup> Caltrans letter to Mr. Richard Tilles from Rodney N. Oto, Senior Transportation Engineer, Office of Highway Operations, dated June 18, 1999.

<sup>8</sup> The partial closure of Battery Caulfield Road would cause traffic volumes to increase on other roadways and at other Presidio gates. While much of the pass-through traffic destined for the Golden Gate Bridge would likely be diverted to Park Presidio Boulevard/Highway 1, some of this traffic and traffic traveling to/from other parts of the Presidio would be diverted to other Presidio gates. The expected increase in traffic at the other gates would be much less than that associated with full closure of the 14<sup>th</sup> and 15<sup>th</sup> Avenue gates as analyzed on pages A-25 – A-28 in response to Comment A.3.15 in Appendix A of the draft SEIS.

## 7 IDENTIFICATION OF THE ENVIRONMENTALLY PREFERRED ALTERNATIVE(S)

CEQ regulations require that an agency identify its environmentally preferred alternative or alternatives (40 C.F.R. 1505.2(b)). Identification of the environmentally preferred alternative(s) need not coincide with the alternative selected for implementation because the decision to select a particular alternative for implementation may involve factors other than environmental quality. After considering impacts to each resource topic by alternative, the Trust has determined that Alternative 3 (Wings Removed Alternative), either as analyzed in the final SEIS or as modified, is the environmentally preferred alternative.

Alternatives 1 (PTMP Alternative) and 4 (Battery Caulfield Alternative) were not identified as environmentally preferred due to the far greater number of vehicle trips generated (Alternative 1) and the greater potential for impacts on natural resources (Alternative 4). The Requested No Action Alternative was also rejected because protection of the PHS district's historic resources while "mothballing" the buildings has proven expensive and difficult, and would cause the site's visual qualities to continue to erode over the long term.

In comparing the environmental merits of Alternatives 2 and 3, the Trust finds that Alternative 3 will result in lesser impacts on overall traffic, parking, air quality, and natural resources. However, the cumulatively significant and less-than-significant impacts of either alternative can be mitigated via measures identified in the final SEIS. Due to Alternative 3's larger number of studio and one-bedroom apartments, which are in greater demand in the Presidio, Alternative 3 has greater potential to provide more housing for Presidio-based employees, thereby reducing energy consumption and auto trips into and out of the park. Removal of Building 1801's wings under Alternative 3 would also enhance the visual continuity of the historic structure and its visual compatibility with the surrounding neighborhood. On the other hand, Alternative 2 could be considered environmentally superior for other reasons, in that it would result in less demolition and reuse of more existing buildings.<sup>9</sup> Notwithstanding that measures are available to mitigate the adverse environmental effects of Alternative 2, the Trust considers Alternative 3 to be environmentally superior to Alternative 2, primarily due to its smaller size.

## 8 MEASURES TO AVOID OR MINIMIZE POTENTIAL ADVERSE ENVIRONMENTAL IMPACTS

All practicable mitigation measures identified in the final SEIS to avoid or minimize environmental impacts that could result from implementation of the selected alternative will be incorporated into the project. These mitigation measures are discussed in more detail at the end of each impact analysis in Section 3 of the final SEIS. As part of the decision to implement Modified Alternative 3, the Trust is adopting a monitoring and enforcement program (MEP) to monitor impacts and mitigation measures during project implementation. The MEP provides for the implementation of the mitigation measures as

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<sup>9</sup> The U.S. Environmental Protection Agency (EPA) stated: "While Alternative 3 would offer a greater level of protection for sensitive plant and animal species and less construction emissions than the other alternatives, Alternative 2, in combination with proposed mitigation, addresses many of EPA's previous concerns regarding wetland impacts." EPA also indicates that it is "pleased with the selection of an alternative that would have fewer environmental impacts than the previous PTMP alternative (Alternative 1)" (EPA comment letter on the draft SEIS, dated October 13, 2004, provided on pages 89-92 in the Response to Comments volume of the final SEIS).

proposed in the final SEIS, where these measures are within the ability of the Trust to implement. Where measures fall outside of the Trust's jurisdiction, this fact is noted, along with a description of ways in which the Trust will assist and encourage other agencies to implement these measures. The MEP has been formatted as a table, and is appended to this ROD as Attachment A, with the following information:

- Mitigation Measure – Taken from Section 3 of the final SEIS
- Reporting Stage and Responsibility – Applicable milestone or phase when mitigation measure will become applicable
- Responsibility for Compliance – Agency with jurisdiction and (where known) individual who will ensure that the mitigation measure is accomplished
- Method of Implementation – How action will be implemented
- Enforcement – How implementation of action will be monitored and enforced

The Trust's Compliance Manager will be responsible for monitoring compliance with the MEP. For measures outside the jurisdiction of the Trust, the MEP will ensure coordination with other agencies, and will monitor and facilitate their implementation of measures. The Trust will make available the status and results of mitigation monitoring to other agencies and to the public upon request.

## 9 PUBLIC INVOLVEMENT

Since the first announcement of the project in April/May 2003, the Trust has received substantial public input, first through a detailed environmental assessment (EA) process followed by the SEIS public review process. The SEIS public review process included public scoping, public hearings, an extended public comment period, and a series of post-final SEIS workshops. Although not required by the NEPA, the EA was also the subject of public scoping, public comment during extended comment periods, and public meetings, such that the project's entire review process included two full sets of opportunities for public participation. In total, the Trust heard approximately 250 speakers, many of whom raised their concern at the public meetings. The Trust also received upwards of 700 letters and electronic mails commenting on the proposed action. In addition to the PHS public meetings and workshops that the Trust hosted, the Trust made presentations and answered questions at numerous meetings independently sponsored by various neighborhood and community groups, including San Francisco Planning and Urban Research Association, Neighborhood Associations for Presidio Planning, and the Planning Association for the Richmond. Section 4 of the final SEIS provides a detailed summary of public input received during the environmental review process for the PHS project, along with a summary of agency consultation.

## 10 COMMENTS ON THE FINAL SEIS

The U.S. Environmental Protection Agency (EPA) published a notice of availability of the final SEIS in the Federal Register on May 19, 2006 (71 FR 29148). A 30-day wait period for the final SEIS ended on June 19, 2006. On June 15, 2006, the Trust Board of Directors held a public meeting to allow the public to express their views, at which 39 individuals spoke, almost all in objection to Alternative 2, the Trust's

then preferred alternative. During or shortly after the wait period, 65 parties submitted 57 written letters and electronic mails<sup>10</sup> (see Table 3). In addition, the Trust conducted a series of public workshops in November 2006 to elicit useful information from neighborhood leaders and other interested parties. Approximately 100 individuals attended the workshops, of which 42 provided oral and/or written comments (see Table 4). The Trust revised its position on the final SEIS-identified preferred alternative and selected the development alternative documented in this ROD primarily based on careful consideration of the issues raised by the public comments received on the proposed action.

## 11 CONCLUSION

In accordance with the provisions of the NEPA, the Trust has considered all of the information in the final SEIS and the complete record, including all public comments received. All of the above factors and considerations warrant selection of Modified Alternative 3 as the development proposal for implementation within the 42-acre Public Health Service Hospital district within the Presidio of San Francisco. This final decision, to become effective at any time upon approval, will enable the Trust to move forward to implement the selected action. The Trust currently employs a design and construction review process as part of its permit issuance process for building and landscape rehabilitation projects. This review process ensures both NEPA and code compliance as well as compliance with the Secretary of the Interior's Standards. The design review process for the development proposal will largely follow the design and construction permit review process already in place, with the exception that the Trust or the master tenant may seek more public and historic preservation agency input as warranted in the design phase.

This record of decision concludes the formal NEPA process for the proposed development within the Public Health Service Hospital district. For more information on this decision, contact John Pelka, Compliance Manager, at 415/561-5300, or at the Presidio Trust, 34 Graham Street, P.O. Box 29052, San Francisco, CA 94129-0052.

Dated: April 17, 2007

[Signed Copy Available for Public Review at the  
Presidio Trust Library, 34 Graham Street]

APPROVED: \_\_\_\_\_ DATE: \_\_\_\_\_  
Craig Middleton  
Executive Director, Presidio Trust

Attachment

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<sup>10</sup> These letters are available for public review at the Presidio Trust Library, 34 Graham Street.

Table 3. Public Agencies, Elected Officials, Organizations and Individuals Commenting on the PHS Final SEIS

<b>County and Municipal Agencies</b>	Kyri McClellan, Project Manager, Base Reuse & Development, on behalf of Mayor's Office of Economic and Workforce Development, City and County of San Francisco	
<b>Elected Officials</b>	Gavin Newsom, Mayor; Michela Alioto-Pier, Member, Board of Supervisors, District 2; and Jake McGoldrick, Member, Board of Supervisors, District 1, City and County of San Francisco (1)	
<b>Neighborhood Organizations</b>	Lake Street Residents Association (LSRA) Neighborhood Associations for Presidio Planning (NAPP) Planning Association for the Richmond (PAR) Richmond Presidio Neighbors (RPN)	
<b>Historic Preservation Organizations</b>	Winchell T. Hayward, on behalf of California Heritage Council National Trust for Historic Preservation San Francisco Architectural Heritage	
<b>Natural Resource Conservation Organizations</b>	Matthew Zlatunich, San Francisco Conservation Committee Member, Golden Gate Audubon Society Amy Meyer, on behalf of People for a Golden Gate National Recreation Area* Donald S. Green, Presidio Committee, Sierra Club (2)	
<b>Individuals</b>		
Ed Alazraqui	Robert L. Harrison,	David Pascall*
Michael Alexander*	Transportation Planning, on	Jon Paulson*
Paul Armstrong	behalf of RPN	Stephanie Peek
Jan Blum, Contact for Dune Ecological Restoration Team	Toten Heffelfinger*	David Perlstein
Rupert Bond	Mark Higbie*	Kate Ripple
Marvin Brook	Julian Hultgren	Dr. & Mrs. David Rose
Jonathan Buckley*	Bruce Jackson	Scott D. Schwartz
John Cabrera*	Eloise Jonas	Kevin J. Shannon
Rhoda Chang	Laurel & Robert Jones	Michael Shough
Julie Cheever*	Jeff Judd*	Margaret Simon
Nicky Chiuchiarelli	Michelle Keene & Mark Tellini	Julie Singer
Josiah Clark*	Gretchen Knoell	Beverly Sinton
Edward Cooper	Steven Krefting*	Peter Sinton
Kerry Whorton Cooper	Jennie C. Lee	Woody Skal*
Jean Davids	Andrea J. Lewin	M. Bradley Smith
Chris Donohoe	Elinore & Lawrence Lurie	Bob Starzel*
Paul A. Epstein*	Neil J. Lynch	Mary Beth Starzel*
Marlene E. Forde	Jim Marshall*	Laurie K. Steele
Carolyn & James Forsyth	Christine Mohan	Daniel Stone*
Robert Frank	Jerome F. Napoli & Diana J. Misthos	Andy Thornley
Carl Grunfeld*	Ward Naughton	Susan Vanneman
	Kelly Neil*	Ann Weinstock*
	Dan Oyharcabal	Mark Weinstock*
	Margot Parke*	Margaret Kettunen Zegart

\*Oral comments only.

Table 4. Individuals Commenting at the November 2006 PHS Public Workshops

**Panel Members**

Charles Chase, San Francisco Architectural Heritage  
 Paul Epstein, PAR, NAPP  
 Christine Hammer, Sustainability Consultant, Sustainability Design Resources  
 Judith Hulka, NAPP  
 Redmond Kernan, Fort Point & Presidio Historical Association, PAR, NAPP  
 Steven Krefting, Presidio Environmental Council  
 Claudia Lewis, RPN  
 Jill Lynch, Park Presidio Neighbors  
 Ron Miguel, PAR, NAPP  
 Jim Ream, Architect, San Francisco Planning and Urban Research Association (SPUR)  
 William Shephard, LSRA, NAPP  
 Richard Springwater, Real Estate Developer, Springwater Investments  
 Ann Weinstock, RPN, NAPP  
 Peter Winklestein, Architect, SPUR, PAR

**Public-at-Large**

Ted Bamberger  
 Natalie Berg  
 Jan Blum  
 Bob Calsey  
 Arlene Campbell  
 Julie Cheever  
 Margaret Cheever  
 Tim Colen, San Francisco  
 Housing Coalition  
 Terry Curley

Robert Evans  
 Chris Getts  
 Ramiel Gutierrez, Caltrans  
 Winchell Hayward  
 Mark Higbie  
 Bob Kalsey  
 Richard Keenan  
 Amy Meyer  
 Scott Pew  
 Daniel Provence, Municipal  
 Transportation Agency

Nancy Ream  
 Gerald Robbins, Municipal  
 Transportation Agency  
 Michelle Sahl  
 Nina Schwartz  
 Woody Skal  
 Nidal Tuqan, Caltrans  
 Mark Weinstock  
 Andrew Wolfram  
 Margaret Kettunen Zegart

Attachment A

Public Health Service Hospital  
Mitigation Monitoring and Enforcement Program





Attachment A  
Public Health Service Hospital  
Mitigation Monitoring and Enforcement Program<sup>11</sup>

MITIGATION MEASURE	REPORTING STAGE	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT
<b>Land Use, Housing, and Schools</b>				
CO-2 <i>Jobs/Housing Balance</i> – The Trust will require its private development partner(s) to provide housing preference to full-time Presidio-based employees who meet an established standard of credit worthiness as a way to accommodate employee housing demand and reduce automobile traffic in and out of the park.	During Lease Negotiations	Presidio Trust Project Manager	Presidio Trust NEPA/NHPA Compliance Process	Incorporate into Lease Provisions
CO-3 <i>Collaboration with SFUSD</i> – The Trust will undertake reasonable efforts to collaborate with the San Francisco Unified School District to locate necessary space for students residing at the Presidio and to continue participation in the federal School Impact Aid Program.	As Warranted	Presidio Trust Government Relations Specialist in Coordination with SFUSD and the Office of Elementary and Secondary Education	Federal Impact Aid Program	Review of SFUSD Application by OESE
<b>Transportation</b>				
TR-11 <i>Lake Street / 14<sup>th</sup> Avenue Intersection Improvements</i> – If desired, prior to the operation of the minor approach(es) of the intersection deteriorating to level of service (LOS) E or F, implement right-turn-only restrictions for the minor approaches at the two-way stop-controlled intersection of Lake Street/14 <sup>th</sup> Avenue if the Caltrans peak hour signal warrant would be met. Using the forecasted peak hour turning movement volumes, an analysis of the Caltrans peak hour signal warrant indicates that at least one of the necessary parts of the warrant would be met in either one or both of the peak hours. The Trust will coordinate with the City and County of San Francisco to determine the contribution of each party to the cost of the improvements based on project- and other Presidio-generated traffic volumes.	Prior to the Intersection Operations Deteriorating to LOS E or F	CCSF in Coordination with and Financial Assistance from the Presidio Trust	CCSF Street-Use / Major Encroachment Permit Process	Incorporate Terms and Conditions into CCSF/Trust Agreement on Intersection Improvements

<sup>11</sup> These mitigation measures were established in the PHS Final SEIS or during its review and will be adopted and implemented by the Trust as part of the decision.

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MITIGATION MEASURE	REPORTING STAGE	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT
<p>TR-15 <i>California Street / 14<sup>th</sup> Avenue Intersection Improvements</i> – Prior to the operation of the minor approach(es) of the intersection operations deteriorating to LOS E or F, implement right-turn-only restrictions for the minor approaches at the two-way stop-controlled intersection of California Street/14<sup>th</sup> Avenue if Caltrans signal warrants would be met.<sup>12</sup> The Trust will coordinate with the CCSF to determine the contribution of each party to the cost of the improvements based on project- and other Presidio-generated traffic volumes.</p>	<p>Prior to the Intersection Operations Deteriorating to LOS E or F</p>	<p>CCSF in Coordination with and Financial Assistance from the Presidio Trust</p>	<p>CCSF Street-Use / Major Encroachment Permit Process</p>	<p>Incorporate Terms and Conditions into CCSF/Trust Agreement on Intersection Improvements</p>
<p>TR-22 <i>TDM Program Monitoring</i> – The Trust will continue to implement a Transportation Demand Management program to reduce automobile usage by all tenants, occupants, and visitors, and monitor the effectiveness of the TDM program on an ongoing basis. If the TDM performance standards as described in Appendix D of the PTMP are not being reached, the Trust will implement more aggressive TDM strategies or intensify components of the existing TDM program, such as requiring tenant participation in more TDM program elements, or implementing more frequent and/or extensive shuttle service. TDM strategies to be implemented within the PHSB district include:</p> <ul style="list-style-type: none"> <li>• Limiting parking to an average of 1.5 spaces per residential unit (except the larger Wyman Avenue residences)</li> <li>• Charging for parking</li> <li>• Providing two parking spaces to a car sharing company to locate its vehicles for use by residents and others</li> <li>• Cooperating with residents in the adjacent neighborhood in expanding the “N” residential parking permit zone to protect neighborhood residents from spillover parking effects</li> <li>• Requiring its private development partner(s) to provide reduced rate or free transit passes to Building 1801 residents</li> <li>• Providing secure bicycle parking for residents and visitors</li> </ul>	<p>Ongoing</p>	<p>Presidio Trust TDM Coordinator</p>	<p>Presidio Trust TDM Program</p>	<p>Incorporate Measure into Annual Budget and Work Programming Process and Require as Lease Provision</p>

<sup>12</sup> The PTMP EIS proposed installing all-way stop control at this intersection, and if that were not feasible because of queues extending into the adjacent intersection on Park Presidio Boulevard, installing a traffic signal. In a comment letter on the PTMP EIS, the San Francisco Department of Parking and Traffic expressed concern about the reasonableness of signalization at this intersection. The alternatives to signalization developed for the intersection of Lake Street/14<sup>th</sup> Avenue (right-turn-only restrictions) would also likely improve the operation of the minor approaches of the intersection of California Street/14<sup>th</sup> Avenue.

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MITIGATION MEASURE	REPORTING STAGE	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT
<p>TR-10 &amp; TR-25 <i>Transit Service Improvements and Monitoring</i> – The Trust will continue to monitor MUNI operations and passenger loads within the Presidio. Continued monitoring of MUNI service in the Presidio, and similar monitoring of GGT service at the Presidio, will indicate any capacity problems. If the monitoring were to reveal insufficient capacity for northbound Presidio-generated passengers during the PM peak hour, the Trust will notify MUNI and/or the Golden Gate Bridge, Highway and Transportation District of the deficiencies. Transit service providers could then reduce passenger load factors through increased service frequency. The Trust will coordinate with the CCSF Municipal Transportation Agency and/or the GGBHTD to determine the contribution of each party to the cost of the improvements.</p>	As Warranted	Presidio Trust TDM Coordinator in Coordination with MUNI and GGBHTD	Presidio Trust TDM Program, MUNI Short Range Transit Plan and Golden Gate Transit Plan	Include Specific Service Proposals in Transit Service Providers Plans
<p>TR-26 <i>Construction Traffic Management Plan</i> – During pre-construction activities, construction contractors will work with the Trust to develop a Construction Traffic Management Plan. The plan will include information on construction phases and duration, scheduling, proposed haul routes, permit parking, staging area management, visitor safety, detour routes, and pedestrian movements on adjacent routes.</p>	Prior to Demolition and Construction Activities	Project Contractor in Coordination with Presidio Trust Project Manager	Construction Traffic Management Plan	Require as Conditions for Demolition and Construction Permits
<p>TR-27 <i>Traffic Volume Monitoring (new)</i> – The Trust will periodically monitor traffic volumes through the 14<sup>th</sup> and 15<sup>th</sup> Avenue gates after Building 1801 is 50 percent occupied, and will continue to periodically monitor traffic volumes through the 14<sup>th</sup> and 15<sup>th</sup> Avenue gates for at least five years following full occupancy of the district. If the average daily traffic generated by the project exceeds that estimated in the Record of Decision (1,520 vehicle trips per weekday), the Trust will make a good faith effort to reduce traffic generated by the project, as described in Mitigation Measure TR-22 <i>TDM Program Monitoring</i>. In addition, if AM peak hour or PM peak hour traffic generated by the project exceeds the volumes estimated in the Record of Decision, the Trust will analyze the operation of the 14<sup>th</sup>/Lake and/or 15<sup>th</sup>/Lake intersection(s). Based on the assessed LOS during the AM peak hour and PM peak hour, the Trust will coordinate with the CCSF to determine the appropriate measure(s) to mitigate any significant project-specific impacts.</p>	During Project Implementation	Presidio Trust TDM Coordinator	Presidio Trust TDM Program	Incorporate Measure into Annual Budget and Work Programming Process

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MITIGATION MEASURE	REPORTING STAGE	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT
<b>Historic Resources</b>				
CR-1 <i>Documentation of Building Addition to be Removed</i> – Should all or some of the non-historic additions to Building 1801 be removed, appropriate mitigating measures will be determined in consultation with the SHPO and the ACHP during the Section 106 (National Historic Preservation Act) consultation process. In this instance, measures will protect historic fabric from inadvertent damage due to removal of non-historic additions.	Prior to Relocation or Removal of Historic Buildings or Additions to Historic Buildings	Presidio Trust Federal Preservation Officer (FPO)	Process Programmatic Agreement (PPA)	Require as Demolition Permit Condition
CR-2 <i>Code Compliance</i> – When undertaking historic building rehabilitation, the Trust and/or its private development partner(s) will comply with applicable building codes and regulations to the extent practicable, including those that provide for reasonable safety for building occupants and access for persons with disabilities.	During Rehabilitation of Historic Buildings	Presidio Trust Project Manager in Coordination Presidio Trust Architectural Historian or Historic Architect	Trust Programmatic Agreement (PA) (see PTMP EIS Appendix D) or PPA	Require as Building Permit Condition
CR-3 <i>Long-Term Maintenance and Preservation of Vacant Buildings</i> – The Trust will ensure that its private development partner(s) perform continued maintenance thereby preventing damage to historic features and ensuring that buildings are adequately maintained. The Trust will "mothball" or otherwise protect buildings within the PHS district that remain vacant to prevent further deterioration, and will inspect them regularly. The Trust will set priorities and undertake necessary stabilization work to ensure long-term preservation and safe conditions for park visitors.	Prior to Occupancy of Vacant Historic Buildings / Following Rehabilitation of Historic Buildings	Presidio Trust FPO / Presidio Trust Residential and Non-Residential Property Program Managers	Presidio Trust Preservation and Maintenance Program / Presidio Trust Leasing Program	Require as Lease Provision
CR-7 <i>Compliance with Standards for Building and Cultural Landscape Rehabilitation</i> – The Trust will ensure that building rehabilitation conforms to 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. Review for compliance with the Secretary of Interior's Standards may occur within the Investment Tax Credit Part I and Part II Certification process as delineated in 36 CFR Part 67. The Trust will ensure continuity between tax credit review and Section 106 (NHPS) review in the PHS as an historically functionally related complex.	Prior to Historic Building Modifications or Historic Landscape Rehabilitation	Presidio Trust FPO	Presidio Trust Preservation and Maintenance Program and Grounds Maintenance Program and PPA	Require through Design and Construction Documents and Document in the Project's Administrative Record and Annual Report per PA

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MITIGATION MEASURE	REPORTING STAGE	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT
For historic landscape rehabilitation, the Trust will ensure conformance to the Secretary of the Interior's Guidelines for the Treatment of Cultural Landscapes. The Trust will also ensure conformance to the PHS Cultural Landscape Assessment for areas within and adjacent to its private development partner(s) proposed leasehold boundary prior to approval of site improvements.				
CR-8a <i>Ongoing Identification of Historic Properties</i> – Consistent with requirements under Section 110 of the NHPA and the PA, the Trust will continue to evaluate buildings or structures that may become 50 years old or may have achieved exceptional significance since the 1993 NHL Update form was completed to determine if they should be included in the list of contributing resources. These evaluations will also encompass archaeological discoveries.	Continual	Presidio Trust FPO and Historical Archaeologist (for archaeological discoveries)	Presidio Trust Preservation and Maintenance Program	Document in Annual Report per PA
<b>Archaeological Resources</b>				
CR-14 <i>Discoveries</i> – In the event that any objects or conditions of historic or archaeological significance in connection with any digging or ground disturbance are discovered at the PHS district, construction contractors will proceed in accordance with the Trust's procedures for notification of discoveries and archaeological monitoring. Any archaeological or historic objects within the district shall be the property of the Trust, and the Trust may require the removal and delivery of such objects to the Trust.	Immediately following Discovery	Presidio Trust Project Manager in Coordination with Presidio Trust Historical Archaeologist	Protocol for Discovery of Archaeological Objects	Require as Dig Permit Provision and Document in Project's Administrative Record and Annual Report per PA
<b>Air Quality</b>				
NR-20 <i>Basic Control Measures</i> –To reduce construction-generated particulate matter (PM <sub>10</sub> ) emissions, construction contractors will implement as appropriate the BAAQMD's recommended control measures for emissions of dust during construction. Basic control measures are as follows:  <ul style="list-style-type: none"> <li>• water all active construction areas at least twice daily</li> <li>• cover all trucks hauling soil, sand, and other loose materials or require trucks to maintain at least two feet of freeboard</li> </ul>	During Project Planning and Construction Activities	Presidio Trust Project Manager in Coordination with Environmental Protection Specialist	Presidio Trust NEPA/NHPA Compliance Process	Incorporate Measure into Project Plans

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MITIGATION MEASURE	REPORTING STAGE	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT
<ul style="list-style-type: none"> <li>• pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas and staging areas</li> <li>• sweep when necessary (with water sweepers) all paved access roads, parking areas and staging areas</li> <li>• sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets</li> </ul>				
<p>NR-21 <i>Transportation Control Measures</i> – The Trust TDM program will implement the relevant transportation control measures of the 2000 Clean Air Plan (CAP) to minimize air emissions from Presidio-related activities. In addition, consistent with the 2000 CAP, the Trust will coordinate land uses to provide buffer zones and avoid conflicts from toxic contaminants or odors.</p>	Ongoing	Presidio Trust TDM Coordinator	Presidio Trust TDM Program	Incorporate TCM Measures into TDM Program
<p>NR-22 <i>Demolition Techniques</i> – The Trust will require construction and demolition waste recovery to reduce PM<sub>10</sub> emissions during removal of outdated structures (see Mitigation Measure UT-8 <i>Waste Diversion</i>).</p>	During Project Planning and Construction Activities	Presidio Trust Project Manager in Coordination with Sustainability Manager	Demolition Debris Recovery Plan	Require as Demolition Permit Condition
<p>NR-23 <i>Construction Equipment Exhaust Measures (new)</i> – To reduce construction-related equipment exhaust of particulate matter and ozone precursors, construction contractors will implement the U.S. Environmental Protection Agency’s recommended measures for equipment emissions. Measures are as follows. All construction equipment used at the construction site will:</p> <ul style="list-style-type: none"> <li>• not idle for more than ten minutes</li> <li>• not be altered to increase engine horsepower</li> <li>• include particulate traps, oxidation catalysts and other suitable control devices</li> <li>• use ultra low sulfur diesel fuel with a sulfur content of 15 ppm or less or other suitable alternative diesel fuel, unless the fuel cannot be reasonably procured in the geographic area</li> <li>• be tuned to the engine manufacturer’s specifications in accordance with a defined maintenance schedule</li> </ul>	During Project Planning and Construction Activities	Presidio Trust Project Manager in Coordination with Environmental Protection Specialist	Presidio Trust NEPA/NHPA Compliance Process	Incorporate Measure into Project Plans

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MITIGATION MEASURE	REPORTING STAGE	RESPONSIBILITY FOR COMPLIANCE	METHOD OF IMPLEMENTATION	ENFORCEMENT
<b>Noise</b>				
NR-8 <i>Natural Sounds</i> – The former Marine Hospital Cemetery after proposed improvements, the Nike Swale, and Quail Commons have been identified as areas important to natural soundscapes, both for recreation and wildlife, and will be monitored during construction or other activities that could be detrimental to this value. Noise attenuation measures will be instituted, if feasible, if noise levels exceed existing standards (see Mitigation Measure NR-23 <i>General Construction/Demolition Noise</i> ).	Ongoing	Presidio Trust Natural Resources Program Manager	Presidio Trust NEPA/NHPA Compliance Process	Document in the Project's Administrative Record
NR-23 <i>General Construction/Demolition Noise</i> –Construction contractors and other equipment operators will be required to comply with the San Francisco Noise Ordinance (San Francisco Municipal Code, Section 2907b), which prescribes working times, types of construction equipment to be used, and permissible noise emissions during construction.	During Project Planning and Construction Activities	Presidio Trust Project Manager in Coordination with Environmental Protection Specialist	Presidio Trust NEPA/NHPA Compliance Process	Require as Building Permit Condition
NR-24 <i>Traffic Noise Reduction</i> – Vehicle traffic throughout the Presidio represents the major source of existing and future noise, especially from U.S. Highways 101 and 1. Although the Trust cannot control the level of noise produced by privately owned vehicles, it can control which types of transit vehicles are used for park purposes at the Presidio. The Trust will use and encourage local agencies and transit providers to select transit vehicles that produce less noise pollution. Energy-conserving government vehicles will be used by maintenance and other divisions. If possible, electric or other alternative vehicles will be used to reduce noise levels.	Ongoing	Presidio Trust Transportation Manager in Coordination with CCSF and other Transit Providers	Presidio Trust Transportation Program	Require through Annual Budget
<b>Visitor Use</b>				
CO-4 <i>Limitation of Visitor Opportunities</i> – The Trust will limit visitor opportunities to those that are suited and appropriate to the significant natural, historic, scenic, cultural, and recreational resources of the Presidio. Only those visitor activities that are consistent with the Trust Act and appropriate to the purpose for which the park was established will be allowed. The Trust will welcome tenants to provide activities consistent with these requirements.	During Project Planning and Environmental Review	Presidio Trust Environmental Protection Specialist	Presidio Trust NEPA/NHPA Compliance Process	Document in Project's Administrative Record

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CO-5 <i>Prohibitions on Visitor Use</i> – The Trust will prohibit visitor uses that impair park resources or values or unreasonably interfere with NPS interpretive activities or other existing, appropriate park uses.	During District / Project Planning and Environmental Review	Presidio Trust Environmental Protection Specialist in Cooperation with NPS	Presidio Trust NEPA/NHPA Compliance Process	Document in NEPA / Project Administrative Record
CO-6 <i>Management Controls</i> – The Trust will impose management controls on visitor uses, if necessary, to ensure that the Presidio's resources are protected. If an ongoing or proposed activity would cause unacceptable impacts on park resources, adjustments will be made to the way the activity is conducted, including placing limitations on the activity, so as to eliminate unacceptable impacts. Any restrictions would be based on professional judgment, law and policy, the best available scientific study or research, appropriate environmental review, and other available data. As visitor use changes over time, the Trust will decide if management actions are needed to keep use at acceptable and sustainable levels.	During Activity- or Planning Area-Specific Analyses	Presidio Trust Environmental Protection Specialist in Cooperation with NPS	Presidio Trust NEPA/NHPA Compliance Process	Document in NEPA Administrative Record
CO-7 <i>Monitoring of Visitor Levels</i> – The Trust will monitor visitation levels to ensure that park uses do not unacceptably affect Presidio resources, including visitor experience. Visitor carrying capacities for managing visitor use will be identified if necessary.	As Warranted	Presidio Trust Environmental Protection Specialist	Presidio Trust NEPA/NHPA Compliance Process	Incorporate Measure into Work Programming Process
<b>Utilities and Services</b>				
UT-1 <i>Water Reduction Strategies</i> – The Trust will require, as appropriate, its private development partner(s) to employ strategies to reduce water use, such as the following: <ul style="list-style-type: none"> <li>• Installing low-flush toilets and low-flow showerheads</li> <li>• Integrating non-invasive, drought-tolerant, low-maintenance landscaping</li> <li>• Retrofitting landscaped areas with low-flow irrigation devices</li> <li>• Informing tenants and residents of water conservation practices</li> </ul>	Ongoing	Presidio Trust Project Manager in Coordination with Conservation Coordinator	Presidio Trust Water Supply Management Program	Incorporate BMPs into Water Supply Management Program and Building Permit Conditions as Appropriate



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<p>UT-4 <i>Wastewater Reduction Strategies</i> – The Trust will implement water reduction strategies described in Mitigation Measure UT-1 to limit water usage at the Presidio, which will reduce wastewater generation as well. The existing on-site sewer infrastructure will also be rehabilitated (i.e., slip-lined and broken and cracked sections of pipe replaced) as necessary to reduce storm water infiltration into the wastewater system.</p>	Ongoing	Presidio Trust Water Conservation Coordinator and Engineering/Utilities Manager	Presidio Trust Water Supply and Wastewater Management Program	Incorporate Measure into Water Supply and Wastewater Management Program
<p>UT-6 <i>Storm Water Drainage System Upgrades</i> – To maintain adequate system capacity and to correct existing operational problems, the Trust will ensure that necessary upgrades to all storm drain piping that conveys storm water from the site to the CCSF storm water drainage system be performed. To the extent practicable, all surface water flow will be directed toward the CCSF combined sewer system and not to Mountain Lake or Lobos Creek.</p>	Prior to Construction Activities	Presidio Trust Project Manager	Presidio Trust Planning and NEPA/NHPA Compliance Process	Incorporate Measure into Building Permit Conditions as Appropriate
<p>UT-7 <i>Storm Water Reduction Measures</i> – The Trust will implement designs or measures to limit or eliminate impervious surfaces in order to reduce storm water runoff volumes and improve water quality. The Trust will practice natural storm water reduction by using on-site vegetation and landscaping as filtration and retention systems to the extent feasible. Such storm water reduction planning will likely occur with the reduction of the built footprint and increase in landscaped area in the PSH complex.</p>	During Project Planning and Environmental Review	Presidio Trust Engineering/Utilities Manager	Presidio Trust Planning and NEPA/NHPA Compliance Process	Incorporate Designs or Measures into Project Plans and Document in the Project's Administrative Record
<p>UT-8 <i>Waste Diversion</i> – The Trust will maximize the recycling of construction and demolition (C&amp;D) debris by requiring that mixed C&amp;D debris must be transported off-site by a registered transporter and taken to a registered facility 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.</p>	During Project Planning and Construction Activities	Presidio Trust Project Manager in Coordination with Sustainability Manager	Demolition Debris Recovery Plan	Require as Demolition Permit Condition
<p>UT-11 <i>Environmental Building Design</i> – The Trust will incorporate the site's environmental conditions in building design solutions, maximizing solar energy and utilizing natural light where practical.</p>	During Project Planning and Design	Presidio Trust Project Manager in Coordination with Sustainability Manager	Presidio Trust NEPA/NHPA Compliance Process and Sustainability Program	Require as Building Permit Condition

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<p>UT-12 &amp; UT-13 <i>Energy Conservation Practices</i> – The Trust will require, as appropriate, its private development partner(s) to develop measures to minimize building energy use, such as the following:</p> <ul style="list-style-type: none"> <li>• Meeting or surpassing the energy conservation requirements of California Title 24 energy code during building rehabilitation where these requirements do not conflict with historic preservation objectives</li> <li>• Carrying out cost-effective energy conservation retrofits of buildings and utility infrastructure</li> <li>• Educating tenants and visitors about energy conservation</li> <li>• Participating in energy-efficient appliance and computer purchasing programs</li> <li>• Installing energy management systems in all non-residential buildings both to monitor energy use and to enable remote troubleshooting and building controls</li> </ul>	During Project Planning and Design	Presidio Trust Project Manager in Coordination with Sustainability Manager	Presidio Trust NEPA/NHPA Compliance Process and Sustainability Program	Require as Building Permit Condition
<p>CO-12 <i>Expansion of Public Safety Services (modified)</i> – The Trust will work with the Presidio Fire Department and the USPP to determine the: 1) scope and level of service, 2) necessary personnel, equipment and facilities, 3) necessary funding, and 4) options and alternatives available to provide effective, efficient and safe protective services to the PSHS district. The Trust will set the specific parameters of services and the limits of the services the departments will provide based on an accurate analysis of the costs needed for each service, and will furnish the necessary resources for delivery of the designated services. The Trust may also identify services it cannot authorize the departments to deliver, and contract those services to other agencies.</p>	Prior to Project Occupancy	Presidio Trust Project Manager in Coordination with Presidio Fire Department and USPP	Presidio Trust Inventory/Condition Assessment Program	Incorporate Measure into Annual Budget and Work Programming Process
<b>Geology and Soils</b>				
<p>GE-1 <i>Geotechnical Report (new)</i> – As part of a design-level site investigation report, the Trust will require its private development partner(s) geotechnical engineer to investigate the site for seismic hazards and recommend measures for earthwork, seismic design, and other geotechnical issues to provide reasonable protection of structural and public safety given site-specific conditions. A soil management plan will be prepared and implemented to ensure the appropriate characterization and disposal of excavated soil. Removal or relocation of geologic resources of interest (such as dune sand, colma foundation or other native soil) will include documentation of the subsurface conditions, including stratigraphy</p>	Prior to Building Rehabilitation and/or Replacement Construction	Presidio Trust Project Manager in Coordination with Engineering Geologist	Presidio Trust NEPA/NHPA Compliance Process	Require as Building Permit Condition

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and contact mapping, consideration of academic research opportunities, and provisions for within-park reuse for landscaping or habitat restoration projects if feasible. Evaluation and mitigation of seismic hazards will be conducted under guidelines established by the California Geological Survey.				
<b>Hydrology, Wetlands, and Water Quality</b>				
NR-14 <i>Visitor Management</i> – To reduce potential visitor impacts on the wetlands and storm drainages in and adjacent to the PHSB district, visitor numbers and uses will be monitored on a recurring basis and measures will be taken to reduce impacts as necessary. Informational leaflets, wayside signs, and regulatory measures will be employed as warranted.	Continual	Presidio Trust Natural Resources Program Manager	Presidio Trust Natural Resources Management Program	Incorporate Monitoring and Measures into Work Programming Process
NR-15 <i>Water Resources Best Management Practices</i> – The Trust will require its private development partner(s) to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) that includes best management practices such as the following: <ul style="list-style-type: none"> <li>• Maintaining appropriate erosion and siltation controls during construction to prevent downstream sediment yields to the Nike Swale wetlands, Lobos Creek, Mountain Lake, or the engineered storm drain and sewer collection system</li> <li>• Permanently stabilizing all exposed soil or fill except where it is deemed appropriate for dune habitat to have some sand movement</li> <li>• Initiating water conservation programs and waste minimization and management programs, including education and monitoring, for project and Trust operations as well as for residents and tenants</li> <li>• For all newly constructed impervious surfaces, preventing increased water runoff volume and velocity, reduced water quality, and reduced water infiltration where practical</li> <li>• Properly maintaining structures or fill to avoid adverse impacts on aquatic environments and public safety</li> <li>• Maintaining existing (or new) drains and culverts to prevent blocking, sediment accumulation and potential erosion downstream of outfalls</li> </ul>	Continual	Presidio Trust Project Manager in Coordination with Engineering/Utilities Manager and Natural Resources Program Manager	Presidio Trust NEPA/NHPA Compliance Process	Incorporate BMPs into SWPPP and Project Plans and Document in Project's Administrative Record

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<p>UT-6 <i>Storm Water Drainage System Upgrades</i> – To maintain adequate system capacity and to correct existing operational problems, the Trust will ensure that necessary infrastructure upgrades to the storm water drainage system are performed. All increases in surface water flow will be directed toward the CCSF combined sewer system and not to Mountain Lake or Lobos Creek.</p>	Prior to Construction Activities	Presidio Trust Project Manager in Coordination with Engineering/Utilities Manager	Presidio Trust Planning and NEPA/NHPA Compliance Process	Incorporate Measure into Building Permit Conditions as Appropriate
<b>Biology</b>				
<p>NR-1 <i>Native Plant Communities</i> – The Trust will reduce the possibility of colonization by non-native plant species by implementing the following:</p> <ul style="list-style-type: none"> <li>• Revegetate with native species areas of native vegetation disturbed by construction, infrastructure repair, and increased land use activities</li> <li>• Prepare a site-specific revegetation plan for the project site</li> <li>• Identify revegetation needs early to allow time to establish seedlings from on-site plants and thus avoid contamination of the gene pool</li> <li>• Wherever possible, use planting materials (seeds and cuttings) from the local Presidio gene pool</li> <li>• Consult with the Soil Conservation Service, California Native Plant Society, NPS, Golden Gate National Parks Conservancy and other technical experts on native plant propagation techniques</li> <li>• Protect all revegetation efforts through buffers and/or barriers during establishment, and maintain and monitor for at least three years</li> </ul>	Prior to Construction Activities Affecting Areas of Native Vegetation	Presidio Trust Project Manager in Coordination with Natural Resources Program Manager	Presidio Trust NEPA/NHPA Compliance Process	Document in Revegetation Plans
<p>NR-3/NR-4 <i>Threatened, Endangered, Rare, and Sensitive Species</i> – To ensure long-term protection of special-status species and to mitigate any project-related indirect and direct impacts on these species, the Trust will continue its inventory and monitoring program for rare and endangered plant and animal species in the PSHS district. For special-status plants, the Trust will implement the following:</p> <ul style="list-style-type: none"> <li>• Within the project site boundary, prohibit the use of invasive non-native species with the potential to compete with special-status plants in landscaping. Prohibited species will include plants on the California Exotic Pest Plants Council List A and B</li> </ul>	Ongoing	Presidio Trust Natural Resources Program Manager	Presidio Trust Natural Resources Management Program in conjunction with Presidio Park Stewardship Program	Incorporate into Annual Workplan and Work Programming Process and Require as Part of Recovery Strategy in Recovery Plans

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<ul style="list-style-type: none"> <li>• Erect a temporary construction barrier around unfenced special-status plant habitat on the upper plateau and train construction workers in identification and ecological needs of the plants</li> <li>• Manage the south-facing dune slope behind the PHSH complex as a buffer to adjacent special-status plant populations on the upper plateau. Management activities may include, but are not limited to, controlling invasive plants and planting low-stature native vegetation buffers (less than 6 feet high) on the upper slope to discourage access by humans and pets into special-status plant habitats and minimize potential conflicts with building operations</li> </ul> <p>For special-status wildlife, the Trust will implement the following:</p> <ul style="list-style-type: none"> <li>• Conduct surveys for special-status wildlife species including San Francisco forktail, special-status birds, raptors, and bats prior to construction activities</li> <li>• If a special-status species is found in the development vicinity, adopt a species-specific mitigation plan to avoid or minimize impacts</li> <li>• If project activity commences during the raptor nesting season (January 1 to August 15), conduct surveys in areas of suitable nesting habitat within 500 feet of project activity. If no active nests are found, no further mitigation will be required. If construction is initiated and completed outside of the raptor nesting season, no mitigation is required. If an active raptor nest is found, a qualified biologist must determine that the activity has no potential to adversely affect the nest. Otherwise, appropriate buffers will be established and no project activity will commence within the buffer area until the biologist confirms that the nest is no longer active</li> </ul>				
<p>NR-5 <i>Wildlife and Native Plant Communities</i> – To protect wildlife and native plant communities during demolition and construction activities, the Trust and its private development partner(s) will implement the following construction-related measures:</p> <ul style="list-style-type: none"> <li>• To the greatest extent feasible, schedule heavy equipment use to avoid areas where soils are wet and prone to compaction</li> <li>• Do not side-cast or spread excavated materials into native plant communities or special-status species habitat</li> <li>• Apply appropriate erosion and siltation controls during construction and stabilize exposed soil or ecologically compatible fill after construction</li> </ul>	During Project Planning and Construction Activities	Presidio Trust Project Manager in Coordination with Natural Resources Program Manager	Presidio Trust NEPA/NHPA Compliance Process	Incorporate Measures into Project Plans and Document in the Project's Administrative Record

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<ul style="list-style-type: none"> <li>• If fill is necessary, use only fill that is certified as weed-free, is compatible with local hydrologic and ecological conditions, and is appropriate for the enhancement of special-status species restoration activities</li> <li>• Immediately revegetate native plant areas affected by construction with native plant species appropriate to the area and grown from local seed stock and temporarily cover the soil and/or revegetation areas</li> <li>• Ensure that human food is never left exposed to wildlife on the construction site</li> </ul> <p>To protect wildlife and native plant communities from project-related impacts, the Trust will require that new development and planned intensive human activities on the upper and lower plateaus be located at least 100 feet from the edge of existing native plant communities and/or assemblages.</p> <p>To protect wildlife and native plant communities after redevelopment activities are completed, the Trust will implement the following ongoing measures:</p> <ul style="list-style-type: none"> <li>• Prohibit the use of irrigation, fertilizers, and herbicides in areas adjacent to or up-gradient from the Nike Swale and other sensitive biologic resources on the upper plateau</li> <li>• In other landscaped areas (i.e., areas within the project footprint that are not adjacent to or up-gradient from sensitive biological resources), manage the use of supplemental irrigation, fertilizers, and herbicides to avoid increasing the water and nutrient supply to dune scrub and other native plant communities</li> <li>• Prepare interpretive materials and install signage emphasizing resource and conservation values in areas adjacent to natural habitat areas and sensitive native plant communities, and provide other educational devices to encourage voluntary compliance with protection measures and discourage pedestrian traffic through sensitive habitats</li> <li>• Enforce existing leash restrictions to prevent pet access in adjacent native plant communities, special-status species habitat, and listed species recovery areas</li> <li>• Regularly inspect adjacent native plant communities, special-status species habitat, and listed species recovery areas for any impacts or damage to biological resources and implement remedial measures (e.g., install and/or modify protective fencing or other barriers) if impacts occur</li> </ul>				

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<ul style="list-style-type: none"> <li>Coordinate all future trail planning and recreation activities in areas adjacent to native plant communities or special-status species habitat with an interdisciplinary team, including a qualified biologist or natural resource specialist</li> </ul>				
<p>NR-7 <i>Artificial Light and Human-Caused Sound</i> – The Trust and its private development partner(s) will minimize the intrusion of artificial light into the night scene of ecosystems, and limit the level of human-caused sound during construction-related activities, project design, and future tenant activities as follows:</p> <ul style="list-style-type: none"> <li>Use artificial lighting only in areas where security, basic human safety, and specific cultural resource requirements must be met</li> <li>Use minimal-impact lighting techniques, and shield artificial lighting to prevent the disruption of the night sky, physiological processes of living organisms, and similar natural processes</li> <li>Allow no gain in light levels in natural habitats within the Nike Swale area to the greatest extent feasible</li> <li>Use best management practices (e.g., use of lighting shields on exterior fixtures, provision of interior shades or blinds in all buildings, use of non-reflective glass, prohibition on exterior loud speakers or audible warnings at garages and loading areas, and use of double sets of doors at primary building entrances) where practical to minimize interior and exterior fugitive light and sound</li> </ul>	Ongoing	Presidio Trust Natural Resources Program Manager	Presidio Trust NEPA/NHPA Compliance Process	Document in the Project's Administrative Record
<p>NR-9 <i>Wildlife and Wildlife Habitat</i> – To protect nesting birds and bat species, the Trust and its private development partner(s) will implement the following:</p> <ul style="list-style-type: none"> <li>Prior to any demolition activities at the PHS complex, retain a qualified bat biologist to check all window coverings for bats. The qualified biologist will then remove any bats present without harm</li> <li>To protect active nests of birds covered under the Migratory Bird Treaty Act, limit landscaping and vegetation removal during the breeding season (January 1 through August 15) and follow park guidelines for the removal of vegetation</li> <li>Retain wax myrtle and other native shrubs adjacent to the maintenance yard, which provide cover and foraging habitat for California quail and other birds</li> <li>Prohibit the ownership and/or maintenance of pets on the upper plateau. Implement Trust pet agreements and pet policies (as the Trust may amend from time to time at its</li> </ul>	During Project Planning and Construction Activities	Presidio Trust Project Manager in Coordination with Natural Resources Program Manager	Presidio Trust NEPA/NHPA Compliance Process	Document in the Project's Administrative Record

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<p>discretion) on the lower plateau as addendums to residential leases, including seeking appropriate remedies for violations such as removing the pet from the Presidio or terminating the lease</p> <ul style="list-style-type: none"> <li>Implement a control program for non-native species such as Norway rats, red foxes and European starlings</li> </ul>				
<p>NR-12 <i>Cumulative Activities</i> – The Trust will ensure that cumulative disturbance to natural habitat areas within the Presidio does not exceed 20 acres within any given year. No more than five acres of that disturbance should be concentrated within one wildlife corridor, sensitive habitat, or plant community without analysis from a professional ecologist. This will not apply to disturbances created by natural storm or environmental events. If such events occur, disturbed areas will be restored or treated consistent with natural resources objectives.</p>	Annually	Presidio Trust Natural Resources Program Manager	Presidio Trust Natural Resources Management Program	Incorporate into Annual Workplan and Work Programming Process