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As part of any new development and uses on the 23-acre site within the Letterman Complex, the Presidio Trust would implement the following mitigation measures to the extent feasible and appropriate. These measures represent modifications to the alternatives that would reduce potentially significant impacts on the following resources to a less-than-significant level. All measures would be regularly evaluated and monitored by the Presidio Trust to determine their effectiveness in reducing impacts.

4.7.1 Geology and Earthquakes

GE-1. *Seismic Hazard Evaluation* – Replacement construction would be allowed to proceed only when the nature and severity of the seismic hazards at the site have been evaluated in a geotechnical report and appropriate structural and design measures have been incorporated into the new construction. A registered civil engineer or certified engineering geologist having competence in the field of seismic hazard evaluation and mitigation would prepare the geotechnical report. The geotechnical report would contain site-specific evaluations of the seismic hazards affecting the project, and would identify any portions of the site containing seismic hazards. The report would also identify any known offsite seismic hazards that could adversely affect the site in the event of an earthquake. The contents of the geotechnical report would include, but not be limited to, the following:

- Project description.
- A description of the geologic, geotechnical and soils conditions at the site, including an appropriate site location map.
- Evaluation of site-specific seismic hazards based on geological, geotechnical and soils conditions, in accordance with current standards of practice.
- Recommendations for appropriate mitigation measures, such as standard structural engineering techniques for foundations and building structural features, that are consistent with established practice and that would reduce seismic risk to acceptable levels.
- Investigation of and integration of soil factors into engineering strengths of existing foundations and structural systems, in accordance with current standards of practice, if existing structures are considered for reuse.
- Name of report preparer(s), and signature(s) of a certified engineering geologist and/or registered civil engineer having competence in the field of seismic hazard evaluation and mitigation.

The Presidio Trust would independently review the geotechnical report to determine the adequacy of the hazard evaluation and proposed mitigation measures. A certified engineering geologist or registered civil engineer having competence in the field of seismic hazard evaluation and mitigation would conduct such reviews.

GE-2. *LAIR Investigation Report (Alternative 1 Only)* – This mitigation measure would apply to Alternative 1 only. Should the LAIR building be considered for reuse, a site investigation report prepared by a certified engineering geologist and/or a civil engineer practicing within the area of his or her competence would



document the results of an investigation of the structure for seismic safety and recommend structural and design measures to reduce the risk of identified seismic hazards to acceptable levels.

4.7.2 Water Quality

WQ-1. *Implementation of Best Management Practices* – Structural and operational best management practices (BMPs) and specific design criteria based upon the California BMP handbooks would be incorporated into project design during the preparation of plans and specifications, including the Storm Water Pollution Prevention Plan (see mitigation measure TS-1). Structural BMPs would include improvements to address runoff, existing and proposed parking areas, oil and grease traps in catchbasins, infiltration systems, stormwater detention basins, dry wells/cisterns, and biofilters. Operational BMPs to be implemented would include erosion control, structure maintenance, pipeline maintenance, pavement cleaning, landscape chemical management, stormwater monitoring, education and training, and tenant controls.

4.7.3 Solid Waste

SW-1. *Waste Reduction Goals* – The Presidio Trust would divert at least 50 percent of the waste stream due to demolition within the Letterman Complex from landfill sites by salvage and reuse in order to promote and demonstrate conservation practices in waste reduction and recycling.

4.7.4 Water Supply and Distribution

WS-1. *Fire Flows* – The selected development team would be required to implement one or more of the following actions: fix specific deficiencies in the onsite water distribution system to provide required fire flow (and duration of flow); install onsite hydrants according to the Uniform Fire Code; use sprinkler systems within buildings, and if necessary, use resistive construction.

WS-2. *Water Supply- and Demand-Side Solutions to Reduce Cumulative Impacts* – The Presidio Trust, in cooperation with all its tenants, would implement the following supply- and demand-side solutions to mitigate potential shortfalls from the Presidio water supply:¹

- Install water meters and develop marginal cost pricing incentives for use of water beyond projected use allocations (potential water savings: 10,000 gpd);
- Install low-flow toilet and shower fixtures, as well as faucet aerators to reduce water consumption during sink use (potential water savings: 20,000 gpd);
- Optimize irrigation through dawn/dusk water schedules, selection of drought-tolerant plants where appropriate, drip systems, automated irrigation controls, etc. (potential water savings: 80,000 gpd);

¹ The numbers for water savings in parentheses are Presidio-wide estimates.



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- Provide comprehensive water conservation education to tenants and residents (potential water savings: 10,000 gpd); and
- Reduce water demand from Lobos Creek by securing an alternate water supply source, such as the use of reclaimed water from the Presidio's water reclamation system (see WT-1 below) for Presidio irrigation purposes (potential water savings: 200,000 gpd), purchased water, onsite well water, or by exchange underground water from other sources (subject to additional environmental analysis and agency review).

WS-3. *Instream Flow Monitoring to Reduce Cumulative Impacts* – To monitor the need for additional water conservation programs and/or securing additional water supply, the Presidio Trust would establish an instream flow monitoring system capable of communicating real time data directly to the water treatment plant to ensure that Lobos Creek flow levels are consistently maintained.

4.7.5 Wastewater Treatment and Disposal

WT-1. *Water Reclamation Plant to Reduce Cumulative Impacts* – As appropriate or necessary to reduce cumulative impacts, the Presidio Trust would develop a water reclamation plant capable of reclaiming and treating a minimum of 200,000 gpd of sanitary sewage extracted from the Presidio main sewer line. The reclaimed water would be made available to supply irrigation water for use in the Presidio and to lower the volume of wastewater discharged to the city's combined sewer system. The water reclamation plant would comply with the water quality criteria, treatment processes, treatment reliability, monitoring and reporting, and restrictions for use of reclaimed water established by the California Department of Health Services in Title 22, Division 4 (Environmental Health) of the California Administrative Code. These criteria would be those applied by the California Regional Water Quality Control Board (San Francisco Bay Region) to ensure that the reclamation plant is safe, reliable, and protective of public health. An engineering report prepared by a properly qualified engineer registered in California and experienced in the field of wastewater treatment, and containing a description of the design of the reclamation system would be filed with the California Regional Water Quality Control Board. The report would indicate the means for compliance with the environmental health regulations and would be integrated with environmental analysis and related studies to satisfy NEPA requirements. The report would also contain a contingency plan that would ensure no untreated or inadequately treated wastewater would be delivered to proposed use areas (potential reduction in wastewater overflow volumes: 200,000 gpd).

4.7.6 Traffic and Transportation Systems

TR-1. *Lyon Street/Richardson Avenue/Gorgas Avenue Intersection Improvements* – Concurrent with the development of the 23-acre site, the Presidio Trust would coordinate with Caltrans, the City and County of San Francisco, and the selected development team to reconfigure the intersection to provide left turns from Richardson Avenue to Gorgas Avenue and left turns from Gorgas Avenue to Richardson Avenue at two separate intersections. These improvements would provide for direct access and egress to the Letterman Complex via Richardson Avenue prior to reconstruction of Doyle Drive. Preliminary planning for the reconstruction of Doyle Drive indicates that direct vehicular access into the Presidio from Doyle Drive would



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be provided. Caltrans and the City and County of San Francisco have initiated preliminary environmental and design efforts for Doyle Drive reconstruction, but selection of a preferred alternative is not expected until the third quarter of 2001.

TR-2. *Lombard Street/Lyon Street Intersection Improvements* – Concurrent with the development of the 23-acre site, the capacity of this intersection would be increased through signalization of the intersection and restriping the one-lane eastbound approach to provide one left-turn lane and one shared right-through lane. The Presidio Trust would coordinate with the City and County of San Francisco and the selected development team to determine the contribution of each party to the cost of the improvements.

TR-3. *Lombard Street/Presidio Boulevard Intersection Improvements* – When needed (i.e., prior to the intersection falling to level of service E or F), the capacity of this intersection would be increased through widening and restriping the one-lane northbound approach to provide one right-turn lane and one through lane. The Presidio Trust would coordinate with the selected development team and determine its contribution, if any, to the cost for the improvements.

TR-4. *Monitoring of Parking* – The overall parking supply and demand would be monitored periodically to accommodate onsite parking demand, encourage transit use and other non-automobile modes of travel, and discourage parking outside the 23-acre site. This measure would be implemented through a parking management plan that will be developed for the Presidio. This plan would include Presidio-wide parking management and operations strategies to ensure a balance of parking supply and demand, minimizing transportation impacts on the Presidio and surrounding neighborhoods, while encouraging tenants and visitors to use alternative modes. Strategies would include adoption and monitoring of Transportation Demand Management measures (see mitigation measure TR-8), recommending parking regulations in adjacent neighborhoods, and frequent monitoring of parking demand.

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



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TR-6. *Relocation of the City's Bike Route 4* – Prior to implementation of intersection improvements at Lyon Street/Richardson Avenue/Gorgas Avenue, the Presidio Trust would coordinate with the City and County of San Francisco to relocate a portion of the city's bike route 4 from Francisco Street between Lyon Street and Broderick Street, to Chestnut Street between Lyon Street and Broderick Street and to Broderick Street between Chestnut Street and Francisco Street.

TR-7. *Adjustment of Bicycle Entry Points near the Lombard Street Gate* – Implementation of mitigation measure TR-2 may require adjustment of routes and physical improvements to facilitate access for bicycles entering the Presidio via the city's bike route 4 (relocated to Chestnut Street, see mitigation measure TR-6) and bike route 6 (Greenwich Street). The Presidio Trails and Bikeways Study (in progress) will consider alternatives to the current access on Lombard Street, to include widening the pedestrian walkway at the Lombard Street Gate, re-establishing the historic opening of the Presidio perimeter wall at Greenwich Street (subject to additional environmental review, including Section 106 compliance), relocating bike route 4 to Gorgas Street, or creating an expanded bicycle and pedestrian path from the Lombard Street Gate.

TR-8. *Transportation Demand Management (TDM) Program* – The Presidio Trust would require tenants and occupants to participate in a TDM program for the Presidio. The TDM program would establish the actions to be taken by the Presidio Trust and all park tenants and occupants to improve transit, pedestrian and bicycle conditions, and reduce automobile usage by all tenants, occupants and visitors, including:

- Carpool/vanpool programs
- Periodic monitoring of traffic volume and mode choice among Presidio residents and employees
- Transit and ridesharing information disseminated on kiosks within the park, The Presidio Trust's website, and employee orientation programs
- Parking management program
- Secure bicycle parking
- Mandatory event-specific TDM programs for all special events
- Onsite sale of transit passes
- Clean-fuel shuttle bus serving the Letterman Complex and the remainder of the Main Post
- A transit hub in the Letterman Complex/Main Post area that would facilitate transfers between public transit buses and the Presidio shuttle buses
- Express bus service to regional transit connection programs (i.e., BART and the Transbay Terminal)

All Presidio tenants, including tenants of the 23-acre site within the Letterman Complex, would be required to participate in the Presidio's TDM program designed to meet performance targets, including a modal split such that at least 30 percent of all employees and visitors travel by transit or non-motorized modes, and vehicle



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occupancy of at least 1.4 persons per vehicle per auto trip.² Performance would be monitored through traffic counts and park-wide user surveys consistent with the TDM program. The Presidio Trust would work closely with the proponent to insure successful implementation of the TDM programs. An annual report of the Presidio's TDM program and conditions would be prepared by the Presidio Trust and made available to the public.

The Letterman lease would include provisions requiring the tenant to participate in the TDM program, and the tenant's Transportation Coordinator would assist the Presidio Trust's Transportation Manager to maximize participation in the TDM program. Elements of the TDM program specific to the 23-acre site would include:

- Onsite Transportation Coordinator
- Guaranteed ride-home program
- Webpage devoted to transportation alternatives
- Flex-time policies
- Telecommuting policies
- Onsite support services
- Preferential carpool/vanpool parking

4.7.7 Cultural Resources

CR-1. *Planning and Design Guidelines* – Under provisions of the NHPA, a Programmatic Agreement has been developed in consultation with the California State Historic Preservation Officer (SHPO), the Advisory Council on Historic Preservation (ACHP) and the NPS regarding the Deconstruction, New Construction, and the Execution of Associated Leases at the Letterman Complex. (Appendix F). Provided for in the Programmatic Agreement are significant roles for these entities in the process of developing design guidelines, conceptual design documents and schematic design documents; also provided for in the Programmatic Agreement are significant roles for these agencies in the construction monitoring process. In addition, the Programmatic Agreement contains opportunity for public input, methodologies for addressing archeological properties, discoveries and unforeseen effects, and a requirement of mandatory notification to the Secretary of the Interior and invitation for the Secretary to participate in consultation where there may be an adverse effect on historic properties.

The Final Planning Guidelines in Appendix B, which have been publicly reviewed and finalized as part of this EIS, will be merged into the Design Guidelines, which are now under development and must be submitted to

² Performance targets would be flexible so that any combination of mode and vehicle occupancy producing the equivalent number of autos would be acceptable. That is, an average vehicle occupancy less than 1.4 would be acceptable if a non-auto mode share of greater than 30 percent produced the equivalent number of autos.



the SHPO for review and comment as part of the NHPA's Section 106 consultation process. The Final Planning Guidelines would therefore be applied and continue to provide direction through the consultation and design review process under the Programmatic Agreement where there would be continuing review of their application by the ACHP, SHPO, NPS, and the public after the environmental review process for this action is concluded.

The Planning Guidelines and Design Guidelines for new construction at the Letterman Complex would be utilized by the Presidio Trust in its review of an undertaking's effect on the character of the historic district. In addition, incorporation of sustainability provisions within the guidelines would assist the Presidio in meeting sustainability goals. The criteria in the Planning and Design Guidelines would guide all replacement construction of buildings (e.g., massing, scale, heights, roof forms, colors, and materials.) The guidelines would conform to *The Secretary of the Interior's Standards for the Treatment of Historic Properties*. New buildings and landscape features would be designed and sited to be compatible with and enhance the historic setting. Historic buildings would be rehabilitated in accordance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*, including the *Guidelines for Rehabilitating Historic Buildings*. In accordance with the Programmatic Agreement, copies of the guidelines (as well as public comments received on their content) would be sent to the SHPO for review.

Where a project, as here, is in the early conceptual stages, the Planning Guidelines should not be viewed as rigid rules. They have been prepared as a continuing interactive set of "guides" to help shape future actions as built and would serve as guides as the project moves through the process of negotiation, the signing of a lease, or the execution of a development agreement. The Trust's intent is to ensure that the project meets the overall intent of the guidelines while project design and construction conforms as closely as practicable to the specific direction of Planning and Design Guidelines.

CR-2. *Planning and Design Guidelines for Infill Construction (Alternative 1 Only)* – This mitigation measure would apply to Alternative 1 only. New construction outside the 23-acre site would require modification to the Planning Guidelines and development of Design Guidelines to support proposed uses. The guidelines would direct the design of compatible structures within the existing historic setting and street patterns of the existing historic hospital complex. These changes to the guidelines would require additional consultation and coordination subject to the Programmatic Agreement.

4.7.8 Archeological Properties

AR-1. *Archeological Management Assessment and Monitoring Program* – The Presidio Trust would conduct an Archeological Management Assessment and Monitoring Program for all undertakings at the Letterman Complex. The Presidio Trust would conduct an inventory study of known archeological sites in the area of each undertaking including test excavations, as appropriate, to determine if significant sites or historic features are extant and if construction might adversely affect archeological resources. Reports of any investigations would be submitted to the SHPO and the ACHP. A phased inventory, evaluation, monitoring, and treatment program for archeological resources regarding ongoing maintenance and construction in the complex would be



conducted. The discovery of any human remains or associated mortuary items covered under the Native American Graves Protection and Repatriation Act would be treated in accordance with 43 CFR 10.4 (Inadvertent discoveries). Consultation and work would be conducted in accordance with the Programmatic Agreement (Appendix F to the EIS).

4.7.9 Wetlands and Stream Drainages

SD-1. *Protection of Tennessee Hollow (Alternative 1 Only)* – This mitigation measure applies to Alternative 1 only, because this would be the only alternative that could impact the future restoration potential of the drainage. Improvements including the design of walkways, landscaping, or structures in the western portion of the Letterman Complex would anticipate the future restoration of the Tennessee Hollow riparian corridor. The stream buffer zone would be mapped based on information developed by technical experts to ensure that such improvements would not be allowed within this zone. Asphalt for trail and any other construction in areas that drain toward the riparian corridor would be avoided, and stormwater runoff water quality would be maintained through biofiltering. No tree removal within the zone would occur without appropriate environmental review.

4.7.10 Native Plant Communities

NP-1. *Landscaping Plan* – A detailed landscaping plan would be prepared and approved as part of the design review process. The landscaping plan would be prepared in consultation with Presidio Trust staff and in accordance with applicable policies, guidelines and plant selection lists. Planning would take into account opportunities for native habitat enhancement where feasible and appropriate.

4.7.11 Wildlife

WL-1. *Ornamental and Native Stand Protection* – Management treatments and practices described in the *Natural Resource Inventory and Vegetation Management Options* (NPS 1997a) would be taken to protect the most valuable habitat based on observed bird diversity within the 23-acre site. These habitat areas would include the palms, the coast live oaks, the redwood, and the Monterey pines and eucalyptus within the historic windrows. Measures would include restricting the size of work areas, avoiding work when soils are wet and compaction-prone, and carefully training work crews to reduce potential impacts on vegetation.

WL-2. *Raptor Nests* – Prior to any construction activities, a qualified biologist would determine whether any birds of prey are nesting in the vicinity and whether they might be impacted by development. Observations would be made during the breeding season (January through July) prior to and during construction activities. If nesting pairs are located in the work vicinity, appropriate buffer zones would be delineated and the area closed by installation of temporary fencing until nesting activity is determined to have ended. Other preventive measures, such as the use of signing, implementation of a monitoring program, and establishment of contingency plans, would also be implemented as necessary to avoid accidental habitat degradation during the construction phase.



WL-3. *Nesting Birds* – Any removal (including mowing and tree-trimming) of landscaped, non-native, or native vegetation would follow applicable laws and park guidelines for protection of nesting birds. These guidelines include restrictions on timing of vegetation removal, requirements for searching for active nests prior to removal, and maintaining mowed areas at low height to discourage nesting. Restriction of work areas and education of work crews would also reduce possible wildlife impacts.

WL-4. *Integrated Pest Management* – All tenants would be educated about and would implement the integrated pest management options for managing the major pests found at the Presidio as identified in the *Integrated Pest Management Information Manual for the Presidio* (NPS 1996b). Visitors would have signs and information regarding the importance of litter control, not feeding wildlife, and pest management issues.

4.7.12 Topography and Soils

TS-1. *Storm Water Pollution Prevention Plan* – As directed by the Clean Water Act and other applicable requirements, a Notice of Intent would be filed with the State Water Resources Control Board prior to initiation of soil-disturbing activities to obtain coverage under the NPDES General Permit for Storm Water Discharges Associated with Construction Activities (General Permit). The General Permit requires development, implementation, and compliance monitoring of a SWPPP that prescribes BMPs including structural, management, and vegetation measures to control erosion and contaminated runoff from the construction site. The inclusion of an analysis of potential downstream impacts on receiving waterways due to the permitted construction may be required. The Presidio Trust would minimize the discharge of soil and pollutants during excavation by requiring contractors to employ measures to contain disturbances within localized areas, including use of turbidity barriers, silt curtains, or equivalent measures as feasible and appropriate. Prescriptions for monitoring and reporting of BMP performance and conditions before and immediately after the completion of work would be conducted pursuant to the General Permit. Compliance with the BMPs included in the SWPPP would result in a minimal amount of soil erosion, and discharges of construction-related pollutants would be minimized.

4.7.13 Air Quality

AQ-1. *Bay Area Air Quality Management District (BAAQMD) Control Measures* – To reduce construction-generated particulate matter (PM₁₀) emissions, construction contractors would implement as feasible and appropriate the BAAQMD's recommended control measures for emissions of dust during construction: 1) water all active construction areas at least twice daily; 2) cover all trucks hauling soil, sand, and other loose materials or require trucks to maintain at least 2 feet of freeboard; 3) pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas and staging areas; 4) sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas; and 5) sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets.



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AQ-2. *Demolition of Existing Buildings* – To the extent feasible and appropriate, the Presidio Trust would apply an environmentally effective approach, including a combination of deconstruction and demolition techniques, to remove outdated structures and reduce PM₁₀ emissions from demolition activities.

AQ-3. *Transportation Measures* – All measures listed in the transportation mitigation section would be implemented to the extent feasible to encourage alternatives to automobile use, contribute to improvement of air quality and lower carbon dioxide emissions.

AQ-4. *Stationary Source Permits* – The U.S. Army’s stationary source permits for the Letterman Complex have been transferred to the Presidio Trust. All permit requirements would remain in force. Any further permits needed by tenants would require compliance with applicable federal, state and local laws regarding air quality.

4.7.14 Noise

NO-1. *Reduction of Construction Noise* – During demolition and construction, contractors and other equipment operators would be required to comply with the terms of provisions equivalent to the standards in the San Francisco Noise Ordinance. Noise-generating construction activities associated with new development would not occur during times of the day in which such construction activities are prohibited under the San Francisco Noise Ordinance. Impact tools would be equipped with intake and exhaust mufflers, and commencement of any explosive or implosive activities would be coordinated with appropriate approvals and notifications from the Presidio Trust. To reduce noise impacts on visitors, construction sites would be temporarily off-limits to visitors. To further reduce noise impacts, where feasible, appropriate barriers would be placed at a distance of 250 feet between sensitive receptors and construction sites and stationary equipment such as compressors and crushers. This would reduce noise by as much as 5 A-weighted decibels (dBA).

4.7.15 Visual Resources

VR-1. *Planning and Design Guidelines* – The Planning and Design Guidelines would be applied as set forth in mitigation measure CR-1 during site planning to protect visual resources.

VR-2. *Height of Replacement Construction* – The height of replacement construction would be compatible with nearby structures, with a maximum allowable height not to exceed that of LAIR (60 feet) as identified in mitigation measure CR-1, *Planning and Design Guidelines*.

VR-3. *Maximum Allowable Square Footage* – The maximum allowable square footage for replacement construction would not exceed 900,000 square feet on the 23-acre site or 1.3 million square feet for the entire 60-acre Letterman Complex.

VR-4. *Vegetation Screen* – The vegetation screen next to the parking area along Lyon Street would be maintained to the extent feasible and appropriate.



4.7.16 Human Health, Safety and the Environment

HH-1. *Asbestos Remediation* – Prior to initiating building demolition within the Letterman Complex, the Presidio Trust would identify all asbestos-containing materials and assess, document, and monitor their condition. The party conducting the building demolition would be responsible for compliance with all applicable asbestos regulations. During removal, workers would use all necessary personal protective clothing and respiratory equipment, and all safety measures would be followed to prevent any contamination outside the removal area. Air purification and air monitoring equipment would be in operation during removal in interior areas. Air sampling would be conducted during removal. Encapsulation would be done using approved sealants. All waste asbestos would be placed in approved and labeled double 6-millimeter plastic bags or approved labeled Department of Transportation (DOT) drums. Waste asbestos would be properly transported under strict adherence to Environmental Protection Agency/Resource Conservation Recovery Act (EPA/RCRA), state and local regulations by a licensed hazardous waste hauler to an approved waste site. All necessary shipping documents would be prepared prior to any shipments.

HH-2. *Lead-Based Paint Abatement* – Prior to initiating building demolition within the Letterman Complex, the Presidio Trust would prepare a management and remediation plan for lead-based paint to reduce impacts of lead-based paint contamination to acceptable levels. All workers involved in lead abatement would follow required procedures to protect themselves and family members from exposure. Warning signs would be posted to mark the boundaries of lead-contaminated work areas. These signs would warn about the lead hazard, prohibit eating, drinking and smoking in the area, and specify any protective equipment required. Workers would use all necessary personal protective clothing and respiratory equipment during removal. During removal, all safety measures would be followed to prevent any contamination outside the removal area. Air purification and air monitoring equipment would be in operation during removal in interior areas. All waste lead-contaminated materials would be placed in approved labeled waste collection receptacles. Waste lead would be properly transported under strict adherence to EPA/RCRA, DOT, and state and local regulations by a licensed hazardous waste hauler to an approved waste site. All necessary shipping documents would be prepared prior to any shipments.

HH-3. *Contingency Plan* – Prior to the initiation of subsurface construction within the Letterman Complex, the Presidio Trust would develop a Contingency Plan to provide a decision framework to address the potential for unidentified contamination discovered during construction activities. The plan would allow the Presidio Trust and its contractors to manage identified contaminants in a timely manner that is protective of human health and the environment. The plan would provide a discussion of the project, applicable regulatory requirements for the contingency activities, appropriate cleanup levels, notification/coordination requirements and plan approval process. The Presidio Trust would coordinate with the applicable regulatory agencies to obtain their concurrence regarding the proposed approach to the plan. Additionally, the Presidio Trust would coordinate with and provide review opportunities for the Presidio Restoration Advisory Board.

