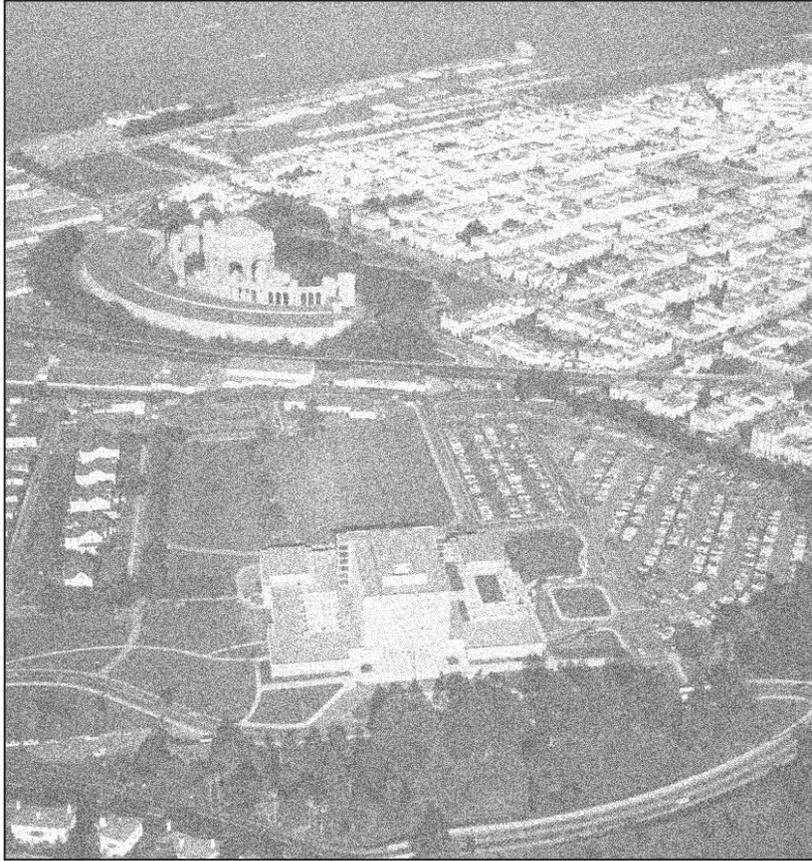

A . R E V I S E D E N V I R O N M E N T A L S C R E E N I N G F O R M



Background

- *Project Title* – New Development and Uses within the Letterman Complex
- *Agency* – The Presidio Trust, 34 Graham Street, P.O. Box 29052, San Francisco, CA 94129-0052
- *Project* – Demolition of the medical center and research institute and development and occupancy of approximately 900,000 square feet of mixed-use space within a 23-acre site
- *Contact Person* – John Pelka, NEPA Compliance Coordinator
- *Phone Number* – (415) 561-5300

Introduction

This revised Environmental Screening Form (ESF) is based on the results of scoping and a preliminary environmental analysis for proposed new development within the Letterman Complex (proposed project).¹ The ESF is being used to determine the “scope of work” and appropriate level of National Environmental Policy Act (NEPA) documentation for the proposed project. The analysis tiers from the 1994 Presidio Final General Management Plan Amendment (GMPA) Environmental Impact Statement (EIS) (National Park Service [NPS] 1994a). The GMPA EIS analyzed alternative concepts for the future of the Presidio, including a specific proposal for development within the Letterman Complex.

This ESF summarizes the issues discussed in the GMPA EIS, incorporates by reference the discussions in the GMPA EIS, and concentrates on issues specific to the proposed project. The ESF also identifies mitigation measures, including those required by the GMPA EIS to be implemented as part of the proposed project. NEPA regulations encourage the use of tiered documents to “eliminate repetitive discussions of the same issues” (Section 1502.20) and to “focus on the issues which are ripe for decision and exclude from consideration issues already decided or not yet ripe” (Section 1508.28). The Presidio GMPA EIS can be viewed at the Presidio Trust, 34 Graham Street, San Francisco, California or at Park Headquarters, Building 201, Fort Mason, San Francisco, California.

Project Description/Location

The 60-acre Letterman Complex (complex) is located in the northeast corner of the Presidio of San Francisco, one of the country’s great national historic sites, with multidimensional significance. The former military post dates back to 1776 and was designated part of the Golden Gate National Recreation Area (GGNRA) in 1972. The Presidio’s 1,480 acres feature unparalleled scenic beauty, dense forests, native plant communities, valuable wildlife habitat, expansive beaches and an extraordinary assortment of historic buildings and landscapes in a national historic landmark setting. The Letterman Complex, one of the most urban of Presidio spaces, is in close proximity to the Lombard Street Gate, and has been designated under the Presidio GMPA as one of the

¹ The Presidio Trust took into consideration comments on significant environmental issues received from agencies that reviewed an earlier version of the ESF (dated January 5th, 1999) in revising the ESF. Commenting agencies included the California Department of Health Services (1999), California Department of Water Resources (1999), California Department of Toxic Substances Control (1999), City and County of San Francisco, Department of Public Works (1999c) and Department of Parking and Traffic (1999e); National Park Service



“building and activity cores” where building demolition and replacement construction would occur. The Letterman Complex contains approximately 1.3 million square feet in about 50 buildings. The bulk of that space is contained in the non-historic 451,000-square-foot Letterman Army Medical Center (LAMC or medical center) and the non-historic 356,000-square-foot Letterman Army Institute of Research (LAIR or research institute), which dominate the site. The remaining square footage is contained in an assortment of historic warehouses, clinics, wards, offices and ancillary buildings, including the Gorgas Avenue warehouses, Letterman support buildings, non-historic dormitories and the 154,000-square-foot Thoreau Center for Sustainability. The site also contains surface parking lots, landscaped areas and roadways.

The proposed project would include the demolition of the outdated medical center and research institute and several other non-historic structures in the Letterman Complex and replacement with new low- to mid-rise or lower-profile mixed-use buildings totaling approximately 900,000 square feet. The Presidio Trust, as lead agency under NEPA and the approval agency for the proposed project, would enter into a long-term ground lease and development agreement to build and occupy the approximately 900,000 square feet of new mixed-use space on a 23-acre site within the complex. Development would comply with the Presidio Trust Act (P.L. 104-333), including consistency with the general objectives of the GMPA, the National Historic Preservation Act of 1966 (NHPA), and nationally recognized building codes².

Alternatives Overview

For the purposes of this analysis, six alternatives have been formulated for development and occupancy of the site:

1. Science and Education Center (Updated Presidio GMPA Alternative)
2. Sustainable Urban Village
3. Mixed-Use Development
4. Live/Work Village
5. Digital Arts Center
6. Minimum Management (No Action Alternative)

The alternatives were selected on the basis of concerns expressed during public involvement activities and the proposals received and shortlisted by the Presidio Trust in response to its Request for Qualifications (Presidio Trust 1998a) to develop the site. The alternatives differ primarily as to their development concept (size and type of project); proposed activities, programs and occupants; community support services and housing opportunities; and parking, access and circulation demands.

(1999e), U.S. Army, BRAC Environmental Office (1999); and U.S. Army Corps of Engineers, San Francisco District (1999). A summary of the environmental issues raised is provided in Section 5.3, Public Agency Consultation of the EIS.

² Development goals and objectives for the site are further described in the Request for Qualifications for the Letterman Complex (Presidio Trust 1998a).



A . REVISED ENVIRONMENTAL SCREENING FORM

Environmental Screening Checklist

The checklist form is used to assist in evaluating the potential environmental impacts of the proposed project with respect to the Presidio GMPA EIS. The checklist form identifies potential project effects as follows:

Yes	No	Impact Adequately Examined	Additional Analysis Required	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No potentially significant impacts that were not already adequately analyzed in the previous GMPA EIS or could not be avoided or mitigated.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Significant impacts that were already adequately analyzed in the previous GMPA EIS but could not be avoided or mitigated.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Potentially significant impacts that were not adequately analyzed in the previous GMPA EIS for which additional analysis would be required.

A discussion follows each impact topic identified in the checklist. Included in each discussion are mitigation measures incorporated or refined from the earlier GMPA EIS, or since added to further reduce such impacts based on the previous analysis.

ARE ANY NEW SIGNIFICANT IMPACTS POSSIBLE ON THE FOLLOWING PHYSICAL, NATURAL OR CULTURAL RESOURCES DUE TO DEVELOPMENT WITHIN THE LETTERMAN COMPLEX THAT HAVE NOT BEEN PREVIOUSLY EXAMINED IN THE PRESIDIO GMPA EIS?

	Yes	No	Impact Adequately Examined	Additional Analysis Required
A. Climate	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>The impact topic of climate was adequately analyzed on pages 101 and 102 of the Presidio GMPA EIS and previously dismissed from further consideration on page 137. Because development at the Letterman Complex would not result in any new impacts on temperature, wind, precipitation, or other weather conditions or patterns that have not been previously examined in the Presidio GMPA EIS, no further analysis is required.</p>				
B. Geology And Earthquakes	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>The impact topics of geology and earthquakes were adequately analyzed on pages 102 and 103 of the Presidio GMPA EIS and dismissed from further consideration on page 137 of the document. The analysis determined that a) structural damage is influenced by the geologic and soil conditions underlying structural foundations; and b) the greatest risk of earthquake damage is to structures built on differentiated superficial deposits. Only the very northern edge of the 23 acres where new development would potentially occur is within a seismic hazard zone (California Department of Conservation 1997).³ Mitigation Measure GE-1 identified below would reduce known and/or anticipated geologic/seismic hazards to an acceptable level of risk. Because development at the Letterman Complex would not result in any new significant impacts on geological processes or conditions that have not been previously examined in the Presidio GMPA EIS, no further analysis is required.</p>				

³ Defined as an area where historic occurrence of liquefaction, or local geological, geotechnical and groundwater conditions indicate a potential for permanent ground displacements such that mitigation as defined in Public Resources Code Section 2693(c) would be required (California Department of Conservation, 1997).



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	Yes	No	Impact Adequately Examined	Additional Analysis Required
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The following mitigation measure would be imposed upon the development team of the preferred alternative to provide reasonable protection of the public safety given site-specific conditions. The measure is based on the State of California’s minimum criteria required for project approval within zones of required investigation as defined in CCR Title 14, Section 3724:

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 hazard affecting the project, and would identify any portions of the project 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 would not be limited to, the following:

Project description.

A description of the geologic and geotechnical conditions at the site, including an appropriate site location map.

Evaluation of site-specific seismic hazards based on geological, geotechnical and soils conditions, in accordance with current standards of practice.

Recommendations for appropriate mitigation measures, such as standard structural engineering techniques for foundations and building structural features, that are consistent with established practice and that would reduce seismic risk to acceptable levels.

Investigation of and integration of soils factors into engineering strengths of existing foundations and structural systems, in accordance with current standards of practice, if existing structures are considered for reuse.

Name of report preparer(s), and signature(s) of a certified engineering geologist and/or registered civil engineer having competence in the field of seismic hazard evaluation and mitigation.

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.

In addition, the following mitigation measure would be adopted as necessary:

GE-2. *LAIR Investigation Report* – 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.

C. Floodplains

The impact topic of floodplains was adequately analyzed and previously dismissed from further consideration on page 137 of the Presidio GMPA EIS. The Letterman Complex is not located in a floodplain. The naturally flowing stream on the western boundary of the site has been diverted into a storm drain pipe and leaves the Presidio through the newly restored inlet at Crissy Field on the bay edge. Because development within the Letterman Complex would not result in any new impacts on floodplains that have not been previously examined in the Presidio GMPA EIS, no further analysis is required.



A . REVISED ENVIRONMENTAL SCREENING FORM

	Yes	No	Impact Adequately Examined	Additional Analysis Required
D. Water Quality	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The impact topic of water quality was adequately analyzed on pages 106 and 107 of the Presidio GMAPA EIS and previously dismissed from further consideration on page 137. It was concluded that proposed improvements would have only minimal effects on water quality in San Francisco Bay. This conclusion is supported by:

- hydrologic and hydraulic analysis conducted for the Letterman Complex subbasins which identified operational procedures and storm water system improvements that would be implemented to reduce pollutant sources and pollutant concentrations in storm water runoff (Dames & Moore 1994);
- NPS staff who evaluated the quantity and quality of storm water that would be discharged into the Crissy Field restored wetlands, including runoff from the 23-acre site (Brian Ullensvang, NPS Remediation Specialist, pers. comm.); and
- California Department of Water Resources staff who reviewed the preliminary analysis for the project and determined that it would not impact bay water quality and therefore have no concerns (California Department of Water Resources 1999).

To the extent possible, pavement would be removed at the site and replaced with landscaping. This would increase the permeable surface area, increase groundwater recharge by rain and irrigation water, and reduce the amount of storm water runoff and the amount of pollutants that eventually would reach the bay. Currently the 23-acre site is about 70 percent paving, hardscape, or building. Under the preferred alternative, this would be reduced to 40 percent with the remaining 60 percent pervious landscaped areas. The resulting average annual runoff for Alternative 5, based on 22 inches of annual rainfall, would be 570,000 cubic feet (cf) of runoff from pervious surfaces and 510,000 cf from landscaped surfaces. Alternative 5's innovative water treatment system would capture 400,000 of the 570,000 cf from pervious surfaces so the net runoff would be 170,000 cf from this cover type, giving a total average annual runoff to the restored wetlands and bay of 680,000 cf. The 23-acre site currently produces a total runoff of about 1,300,000 cf or about twice the planned site runoff. In addition, 80 percent of this runoff is from impervious surfaces, mostly paving.

Because proposed development within the Letterman Complex would not result in any new impacts on water quality that have not been previously examined in the Presidio GMPA EIS, no further analysis is required.

The following mitigation measure would be adopted to further minimize potential effects on water quality that could adversely affect aquatic and terrestrial habitat within Crissy Field and San Francisco Bay:

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

E. Solid Waste	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The impact topic of solid waste was adequately analyzed and previously dismissed from further consideration on page 137 of the Presidio GMPA EIS. Solid waste would be managed through an NPS contract with a private contractor to collect, remove and haul trash to a transfer station off post. As a result of recycling and waste reduction methods to be employed by tenants, the overall tonnage would not have significant effects during



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operation. However, since preparation of the GMPA EIS, changes have been made to the development concept that may result in an adverse impact on solid waste disposal facilities in the region. Development within the site under four of the six alternatives would necessitate demolition of both the LAMC and LAIR. Because demolition of the LAIR building was not previously considered in the GMPA EIS, additional analysis of the impact due to solid waste generated during demolition is required.

F. Regional Economy and Employment

The impacts on employment opportunities and on the local and regional economy from development within the Letterman Complex are within the scope of and adequately analyzed on pages 164 through 167 of the Presidio GMPA EIS. The analysis involved calculating projections of employment, payroll, state sales and use tax revenues, and employee expenditures in the years 2000 and 2010. The analysis determined that changes in employment and earnings are not expected to cause a large disruption in the regional labor market. While the alternatives currently under consideration would differ on the mix of economic activity included in the GMPA, they would all fall within the range of economic activities envisioned for the Presidio in the GMPA EIS. Nevertheless, activities at the 23-acre site should provide a boost to San Francisco's economy since much of the income gain is expected to occur within the City and County of San Francisco. Development within the Letterman Complex is estimated to increase city employment and payroll by about 0.14 percent based on projections in the GMPA (NPS 1994a, p. 166). Because proposed development would not result in any new impacts on the regional economy and employment that have not been previously examined in the Presidio GMPA EIS, no additional analysis is required.

G. City Services

As discussed below, the Letterman Complex is served by utilities provided by both the Presidio Trust and outside utility providers.

1. Water Supply and Distribution

The potential impacts of development within the Letterman Complex on water services were analyzed in site-specific detail on pages 225 and 226 of the Presidio GMPA EIS. The analysis assumed that water use within the Presidio would come primarily from the Presidio sources and would be treated by the Presidio's (recently upgraded) water treatment facilities⁴. However, it estimated a minimal amount of city of San Francisco water (10,000 gallons per day) might be needed if uses at the LAIR required water of a purity that is not available from park sources. It is now envisioned that potable water may not be required from the city to service the Letterman Complex. In light of the upgrades in the Presidio water treatment system and water requirements for the development, additional analysis will be required.

2. Wastewater Treatment and Disposal

The sanitary sewer system at the Letterman Complex consists of several lines of variously sized cast iron pipe that flow to the east and discharge into the City and County of San Francisco system at the Lombard Street Gate. The system has recently been slip-lined. The potential impacts of development within the Letterman Complex on wastewater services are within the scope of the Presidio GMPA EIS and are analyzed on pages 106, 130, and 170 through 172. The analysis determined that no additional burden on the city system would be expected because it has the capacity to readily handle the estimated sewage discharge. Tenants would be expected to pay their prorated share of system costs (impact fees) as well as any service charges levied by the city. Future rates would vary

⁴ The recent completion of renovations and upgrades at the Presidio water treatment plant has made it possible to resume diversions of Lobos Creek for potable and non-potable water. Diversions from this water resource are limited by natural flow capacities and specific goals in the Presidio GMPA.



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according to a number of factors, including inflation and the level of the city’s sewer system–related bonded indebtedness. Service charges would be calculated so that the system pays for itself. The analysis concluded that there would be no net benefit or cost to the city for the provision of sewer service.

For the purposes of this preliminary analysis, sewage discharge for each of the alternatives currently under consideration was recalculated. The analysis determined that maximum outflow to the City/County of San Francisco (CCSF) wastewater treatment facilities would be 78,000 gallons per day (gpd). The city has substantiated that treatment facilities operated by the CCSF would have sufficient wastewater treatment capacity to accommodate the estimated outflow (Beth Goldstein, Hydraulic Planning Group, pers. comm.; CCSF 1999d). The wastewater outflow represents approximately 0.02 percent of the average daily effluent treated by the Southeast Water Pollution Control Plant (the CCSF wastewater treatment facility that receives Presidio wastewater). At the same time, the city noted that new development at the Letterman Complex would contribute incrementally to the discharge of partially treated sewage from the city’s combined sewer system during major storm events. Therefore, the city requested that the Presidio Trust should explore ways to offset increases in overflow volumes attributable to increased sanitary flows from the Letterman Complex (CCSF 1999d). This issue of untreated wastewater being discharged into the bay through emergency overflows into the storm drain system was previously discussed in the GMPA EIS (page 106). However, because the city would be reimbursed through sewage fees for wastewater treatment and disposal, no mitigation measures were identified.

In order to respond to the city’s request and to address the needs of Presidio tenants for services such as waste management in an environmentally responsible manner as contemplated in the general objectives of the GMPA, the Presidio Trust is establishing a reclaimed water system that would be online and capable of: 1) accepting wastewater equivalent to no less than maximum sanitary flows from the 23-acre site for irrigation purposes within the Presidio; and 2) lowering overflow volumes within the city’s system during wet weather events. Because the following mitigation measure would be incorporated into the project to address previously disclosed but heretofore unmitigated impacts on the city’s wastewater treatment and disposal system due to park-wide development, no further analysis is required.

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 enforced by the California Regional Water Quality Control Board (San Francisco Bay Region) to ensure that the reclamation plant is safe, reliable, and protective of public health. An engineering report prepared by a properly qualified engineer registered in California and experienced in the field of wastewater treatment, and containing a description of the design of the reclamation system would be filed with the California Regional Water Quality Control Board. The report would clearly 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.

3. Storm Drainage

The Presidio’s storm water system is managed by the Presidio Trust. Storm water presently flows north to San Francisco Bay. Approximately 200 catch basins are present in the Letterman Complex area. The potential impacts of development within the Letterman Complex on the storm drainage system are within the scope of the Presidio



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GMPA EIS and were analyzed on page 226. The analysis determined that the storm drainage system at the Presidio would be repaired and rehabilitated. Since 1994, these repairs have been initiated, and no additional demands or impacts on this system due to new construction at the Letterman Complex are anticipated. Implementation of features designed to minimize downstream impacts (such as the water treatment system in Alternative 5) would reduce the quantity of storm water discharged to San Francisco Bay (see Section D, Water Quality). In addition, a Storm Water Pollution Prevention Plan (SWPPP) (see Mitigation TS-1 below) and Best Management Practices (see Mitigation WQ-1 above) would improve the quality of discharged storm water through the construction of storm water treatments, and reductions in points of contact between storm water and pollutants and possible discharge of high-risk storm water to sanitary sewers. Because proposed development would not result in any new impacts on the storm drainage system that have not been previously examined in the Presidio GMPA EIS and additional mitigation measures would be incorporated into the development, no further analysis is required.

4. Electricity

The Trust's dedicated underground 12-kilovolt distribution feeders that originate at the Presidio's Greenwich substation serve the Letterman Complex. The potential impacts of development within the complex on the electric power distribution system are within the scope of the Presidio GMPA EIS and were analyzed on page 226. Since preparation of the GMPA EIS, electrical facilities servicing the Letterman Complex have been brought up to industry standards. Usage will be billed directly to the tenants. In addition, the development team and tenants would be required to incorporate technologies and demonstrate practices that reduce impacts or produce benefits in energy conservation. Because proposed development would not result in any new impacts on the electric power distribution system that have not been previously examined in the GMPA EIS, no further analysis is required.

5. Natural Gas

As discussed on page 20 of the GMPA EIS, the Letterman Complex would use the natural gas system maintained by Pacific Gas and Electric. No impacts would result, and no further analysis is required.

6. Law Enforcement Services

The NPS would have primarily law enforcement responsibility at the Letterman Complex through the U.S. Park Police (USPP) San Francisco Field Office (SFPO), which is currently responsible for law enforcement duties within the Presidio. The potential impacts of development within the Letterman Complex on law enforcement services are within the scope of and were analyzed on page 227 of the Presidio GMPA EIS. The analysis determined that law enforcement services are expected to be sufficient to control criminal activity, and there would be no impacts on operations or services, or on surrounding residential neighborhoods and commercial districts. Since adoption of the GMPA EIS, the SFPO has provided law enforcement services at the Presidio and has entered into a mutual aid agreement with the City and County of San Francisco. For the purposes of this preliminary analysis, the SFPO was contacted to determine whether any of the alternatives currently under consideration would result in increased demands for law enforcement services. The SFPO reviewed the alternatives and police patrol staffing needs in light of existing manpower constraints and minimum coverage available within current, authorized Full Time Equivalent (FTE) positions (NPS 1999j). Based on this review, the number of staff required to service the alternatives falls within the staffing plan established in the Presidio Public Safety Analysis (NPS 1993d). In addition, service costs were calculated to determine whether the alternatives would be within the range of costs that would be reimbursed through Service District Charge (SDC) (BAE 1999).⁵ The calculations

⁵ SDCs are calculated to allow NPS to collect sufficient revenue to cover the costs of law enforcement and other services provided to Presidio tenants. The SDC allocates the cost of providing district services to Presidio tenants and organizations (excluding visitor-related costs) at buildout according to generally accepted fiscal impact methodologies. Thus, when estimating police staffing, SDCs take into



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confirmed that SDC revenues would be adequate to cover additional SFFO costs. Therefore, because proposed development would not result in any new significant impacts on law enforcement services that have not been previously examined in the Presidio GMPA EIS, no further analysis is required.

7. Fire Protection Services

Fire protection services would be provided by the NPS. The potential impacts of development within the Letterman Complex on fire protection services are within the scope of and were analyzed on page 227 of the Presidio GMPA EIS. The analysis determined that there would be no negative impacts on these services, or on the San Francisco Fire Department other than for any services that might be provided through mutual aid agreements. Since adoption of the GMPA EIS, the NPS has provided fire protection and suppression services and has entered into a mutual aid agreement with the City and County of San Francisco Fire Department. The current number and type of companies located at and the staffing plan for Station 1 at the Presidio already meet fire prevention and suppression service demands of existing buildings at the Letterman Complex. Given the physical proximity of the complex to Station 1 and the 60-foot height limit set forth in the GMPA for new construction at the site, no changes in the number and type of companies or staffing plan would be required by the proposed alternatives. However, to the extent that a specific use, massing or geographic distribution of structures results in requirements for fire protection services or specialized equipment in excess of existing or planned service and/or equipment outlays, the development team would be required to reimburse the Presidio Fire Department for such additional service and/or equipment costs. These requirements, if any, would be identified during the plan check process in accordance with normal industry practices (personal communication with Bill Oswald, Fire Chief, Presidio Fire Department). Therefore, because the proposed development would not result in any new significant impacts on fire protection services that have not been previously examined in the Presidio GMPA EIS, no further analysis is required.

8. Emergency Medical Services

Emergency medical services, including basic and advanced life support and hospital transportation for victims, would be provided by the NPS personnel assigned to the Presidio Fire Department. As discussed on page 169 of the GMPA EIS, there would be no effect on emergency units operated by the San Francisco Department of Public Health other than for services that might be provided through mutual aid agreements. Since the adoption of the GMPA EIS, the NPS has provided emergency medical services at the Presidio and has entered into a mutual aid agreement with the City and County of San Francisco. The NPS has staffed its ambulatory crews to comply with local agency protocols. Given the physical proximity of the Letterman Complex to Station 1 where the NPS houses its ambulance crew, no change in response times or required staffing that might impact emergency medical services is expected (personal communication with Bill Oswald, Presidio Fire Chief, National Park Service). However, to the extent that a specific use (such as certain assisted living programs) results in demand for emergency medical services in excess of existing or planned levels of service, the development team would be required to purchase such additional emergency medical services. Therefore, because proposed development would not result in any new impacts on emergency medical services that have not been previously examined in the Presidio GMPA EIS, no further analysis is required.

account the following: the type of use, hours of use, the type and availability of parking, the numbers of after-hour or special events, the mix of commercial, visitor and residential occupants, internal security needs, and integration of this service into the existing public safety infrastructure.



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	Yes	No	Impact Adequately Examined	Additional Analysis Required
9. Schools	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The potential impacts of development within the Letterman Complex on public schools were analyzed on page 171 of the Presidio GMPA EIS. The analysis determined that minor changes in enrollment due to changes in Presidio occupancy would not have a significant impact on the San Francisco Unified School District and Community College because the system could adequately provide the needed services. However, since preparation of the GMPA EIS, new housing units would be made available under two of the six alternatives. Because the number of school-age children from the Presidio enrolled in public schools may be greater than previously analyzed, the demand on school facilities would require further analysis.

H. Housing	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The impacts on future housing stock use and demand from development at Presidio were analyzed on pages 172 and 173 of the Presidio GMPA EIS. The analysis determined that the Presidio was expected to provide sufficient housing for a variety of income levels to satisfy any new housing demand created by proposed development. No significant effects on the regional housing market or the affordable housing demand were expected. However, since preparation of the GMPA EIS, building and land uses under four of the six alternatives being considered for the Letterman Complex have changed, resulting in a different level of housing demand. (To the extent that proposed onsite housing would support Letterman Complex activities, the jobs-housing balance would be improved, thereby reducing transportation and related impacts.) Furthermore, several policies and programs have been established that could impact housing affordability. Since the impacts of development of the Letterman Complex on housing demand have not been determined, additional analysis is required.

I. Healthcare and Medical Research	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The impacts on the military of closing the Letterman facilities have already occurred and are within the scope of and adequately analyzed on pages 3-15 and 3-16 of the Army base closure FEIS (U.S. Army Corps of Engineers 1991). The analysis concluded that closure of LAMC, combined with other closures at that time (e.g., the Oak Knoll Naval Hospital) would have an adverse effect on long-term health care facilities and would increase costs of medical care for military retirees and their dependents. The general impacts of rehabilitating, rebuilding or removing the LAMC, and leasing LAIR to a tenant or tenants for reuse as a research facility were described on page 174 of the GMPA EIS. However, the specific impacts of reusing the Letterman facilities could not be identified without a reuse proposal. Development within the Letterman facilities for other than research space may have an adverse effect on medical, life science and/or earth science knowledge and discovery in the Bay Area since the site could be precluded from such use under three of the six alternatives currently being considered. Because the space needs for medical research programs in San Francisco and the Bay Area have not been identified, additional analysis will be required.

J. Medical Aid Incidents	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The potential impacts of development within the Letterman Complex on medical aid incidents are within the scope of and analyzed on page 175 of the Presidio GMPA EIS. The GMPA EIS determined that the increased number of medical aid incidents on the Presidio requiring hospitalization would not have an effect on hospital emergency rooms. Cases would be distributed among area hospitals, and the existing hospital emergency medical care system throughout the city could adequately provide the needed services. Because proposed development would not result in any new impacts on hospital services that have not been previously examined in the Presidio GMPA EIS, no further analysis is required.



A . R E V I S E D E N V I R O N M E N T A L S C R E E N I N G F O R M

	Yes	No	Impact Adequately Examined	Additional Analysis Required
K. Traffic and Transportation Systems	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The potential impacts of development within the Letterman Complex on traffic volumes on Presidio roadways were analyzed on pages 176 through 184 of the Presidio GMPA EIS. The traffic models illustrated future worst-case traffic and travel conditions. The GMPA EIS projected average daily traffic to increase by 26 percent on weekdays and 27 percent on weekends by 2010 as a result of Presidio land use changes (NPS 1994b). The potential for congestion and other impacts related to traffic increases would be highest within the Presidio and near its boundaries. The analysis of traffic and transportation impacts concluded that implementing roadway and intersection improvements and correcting dangerous traffic conditions at several locations would avoid most impacts.

The baseline year (“existing conditions” model) used for impact comparison (1988) and intersection turning movement counts (summer 1991) in the GMPA EIS would require updating and re-analysis based on the Presidio Traffic Update Report of Findings (NPS 1996a) and other recent traffic counts. Since preparation of the GMPA EIS, building and land uses under four of the six alternatives and potential intersection and roadway improvements being considered for the Letterman Complex have changed, resulting in the need to update the previous traffic analysis. Marina neighborhood streets would also probably experience additional congestion during demolition of the LAIR. Also, additional traffic demand management actions to be taken at the Letterman Complex during operation to encourage non-automobile travel could result in noticeable increases in the non-automobile mode shares above what was previously projected. Because this new information may raise new traffic issues, additional analysis will be required.

The following mitigation measures would be adopted to reduce impacts on traffic and transportation systems. Additional mitigation measures may be imposed during the NEPA process.

- TR-1. *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. The contractor(s) would limit the transport of demolition debris, 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. Any alterations to the Construction Traffic Management Plan would be subject to written approval by the Trust and review agencies prior to implementation.

- TR-2. *Traffic Demand Management* – 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. All Presidio tenants would be required to participate in the Presidio’s TDM program designed to meet performance targets. Performance would be monitored through means including traffic counts and park-wide user surveys consistent with the TDM program. 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.

- TR-3. *Parking Supply and Monitoring* – Changes to the parking system at the Letterman Complex would reduce the number of currently available spaces while simplifying and better defining parking areas and locating them where needed. Parking demand would be monitored and the parking supply would be reduced over time as alternative transportation mode improvements were made. Parking for the Letterman Complex in adjacent neighborhoods would be discouraged. Adequate short-term, service and disabled-access parking



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	Yes	No	Impact Adequately Examined	Additional Analysis Required
would be provided in convenient locations. It is expected that U.S. Park Police would enforce parking restrictions and regulations inside the park.				

L. Land Use, the Presidio Community and Surrounding Neighborhoods

The impacts of new uses at the Letterman Complex on the Presidio and surrounding neighborhoods are within the scope of and adequately analyzed on pages 184 and 185 of the Presidio GMPA EIS. To quantify the changes in building uses, a building database was developed that identified the 1989 use and square footage of each structure in the Presidio. For the purposes of assessment, each building was assigned a treatment and use code (for example, rehabilitation for current or new use, removal) corresponding with proposed actions, and the building use categories were totaled. In addition, land use maps were developed on a broader scale to represent overall use of the planning areas. Acreage figures were calculated for potential land uses. The analysis in the GMPA EIS determined that the density and character of land uses would not change at the Letterman Complex, but the area would be used for institutional purposes.

Proposed development under the alternatives being considered would not increase the density of land uses at the complex, since only replacement construction would be allowed to occur and total square footage would be capped at the existing 1.3 million square feet. In addition, although new uses are now being considered, these uses, including residential, retail, lodging and commercial/office have been contemplated in the GMPA for various areas within the Presidio. Implementation of recommendations in the Letterman Complex-specific planning guidelines on the appropriate character and location of uses within the 23-acre site and the remainder of the complex would ensure that no significant land use impacts would result.

New employment and uses within the Letterman Complex could lead to an increase in expenditures for business-related and personal goods and services ranging from office supplies and major equipment to daily lunches. Portions of this incremental increase in retail expenditure would be captured by businesses in areas along the western end of Lombard Street and Chestnut Street. Thus, the incremental increases in expenditure levels would provide increased business opportunities for retail and service establishments located in these areas, and no significant impacts are expected.

The EIS acknowledges that for areas that have been left vacant for a number of years, such as the Public Health Service hospital site, neighbors could be affected by increased activity at the sites and by additional noise and traffic in the vicinity. This is also a reasonable scenario for the near-vacant 23-acre site at the Letterman Complex. The associated impacts of changing land uses, including the effects on noise and traffic, are presented elsewhere in this document. Because proposed development would not result in any new impacts on land use, the Presidio community or surrounding neighborhoods that have not been previously examined in the Presidio GMPA EIS, no further analysis is required.

M. National Historic Landmark District

The potential impacts of development within the Letterman Complex on the National Historic Landmark district are analyzed on page 191 of the Presidio GMPA EIS pursuant to the National Historic Preservation Act (NHPA). The analysis determined that the removal of several non-historic structures within the Letterman Complex would allow for restoration of the historic setting of the earlier hospital complex and significant streetscapes, and would have a beneficial effect on the district. The GMPA further stated that if the LAMC is demolished and replaced with new construction, these buildings would be designed to be in keeping with the historic scene and in accordance with planning guidelines. Because the specific impacts of new design and replacement construction on the district could not be identified before preliminary development plans were submitted, further analysis of impacts is required.



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The following mitigation measures are incorporated or refined from the GMPA EIS to ensure that new construction would not have an adverse effect on the National Historic Landmark district. Additional mitigation measures may be imposed during preparation of the NEPA environmental analysis, planning guidelines and Section 106 consultation under the NHPA.

CR-1. *Planning Guidelines* – The environmental document for the Letterman Complex would include planning guidelines for the site to be utilized and considered by the Presidio Trust in its review of an undertaking’s effect on the character of the historic district (Presidio Trust 1998b). In addition, these guidelines would include provisions to meet sustainability goals. The criteria and design guidelines would direct all replacement construction and set forth review processes for replacement construction of buildings (massing, scale, heights, roof forms, colors, materials). A copy of these guidelines would be sent to the State Historic Preservation Officer for review.

N. Archeology

The potential impacts of development within the Letterman Complex on archeology are analyzed on page 193 of the Presidio GMPA EIS pursuant to applicable laws, regulations and policies for analyzing potential impacts on archaeological resources. The analysis determined that, because little is known about the extent, nature or location of artifact caches and the integrity of prehistoric and historic archaeological deposits at the site, any replacement construction might adversely affect remains. Since preparation of the GMPA EIS, four archeologically sensitive zones that may contain features or sites which would either contribute to the National Historic Landmark district or be individually eligible for listing on the National Register of Historic Places have been identified within the 60-acre Letterman Complex. These zones are:

- PAS-2. Presidio Marsh Archeological Sensitivity Area
- PAF-30. The Presidio House
- PAF-51. Earthquake Relief Camp 1 and Hot Meal Kitchen
- PAF-56. Spring Valley Water Company Flume/Pipeline

The removal of parking lot pavement and introduction of basement construction, underground parking or grading, because of the depth of the disturbance, may impact these zones and heretofore undetected archeological resources. Because proposed development may result in new significant impacts on archaeological resources that have not been previously identified in the Presidio GMPA EIS, further analysis is required.

O. Wetlands and Stream Drainages

The potential impacts of development within the Letterman Complex on wetlands and stream drainages are analyzed on pages 104, 105, and 194 of the Presidio GMPA EIS. The analysis determined that there are no wetlands on the Letterman Complex. The Tennessee Hollow drainage on the western edge of the complex has been altered through past construction by the U.S. Army and now drains directly into the restored Crissy Field wetlands area via the Presidio storm drain system. Proposed development activities would have no negative effect on these reestablished wetlands (see Section G.3, Storm Drainage). However, since Alternative 1 could involve infill construction throughout the Letterman Complex, this alternative could conflict with future restoration of the small section of riparian stream corridor to complete the natural drainage from Tennessee Hollow to Crissy Field. (The Tennessee Hollow project would be examined in a detailed plan that would include additional analysis of environmental impacts.) Because the following mitigation measure would be implemented as part of Alternative 1 to ensure that no future infill development would interfere with future restoration of the stream drainage, no further analysis is required.



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	Yes	No	Impact Adequately Examined	Additional Analysis Required
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SD-1. *Protection of Tennessee Hollow (Alternative 1 Only)* – 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.

P. Native Plant Communities

The potential impacts of development within the Letterman Complex on native plant communities are within the scope of and adequately analyzed on pages 194 and 197 of the Presidio GMPA EIS. The analysis determined that there are no existing native plant sites on the 23-acres site. Based on a tree survey prepared under the direction of the Presidio Trust (HortScience, Inc. 2000) for the purposes of this analysis, replacement construction within the 23-acre site could require the removal of 317 non-native mature trees (see Tables A-1 through A-3). Planning would take into account:

- opportunities for preserving existing mature trees;
- salvaging trees suitable for replanting within other areas of the Letterman Complex (including undisturbed portions of the 23-acre site), the Presidio, or elsewhere to the extent feasible; and
- remedial actions to improve vigor and construction survivability of preserved and replanted trees as part of long-range maintenance and management.

Removal of these trees is considered a less than significant impact because:

- none of the trees to be removed qualify as heritage landmark trees⁶ (Nick Weeks, NPS Senior Landscape Architect, pers. comm.);
- none of the trees to be removed are native species⁷;
- as discussed above, trees providing the most valuable wildlife habitat would be preserved and protected in place (see Section Q, Wildlife). These trees represent approximately 22 percent of the total trees to be preserved within the site;
- many of the trees to be removed are restricted or conditionally prohibited from use within designed landscapes within the Presidio because of existing and potential problems (disease, pest, and fire potential; invasive spread into native plant communities; short-life span; view-blocking tree height; or inappropriate soil or climatic conditions). These trees include the Monterey pines, pittosporums, liquidambar, and acacias which represent approximately 27 percent of the total trees to be removed;
- many of the trees to be replaced have strikingly different characteristics from historic species, would not maintain the visual integrity of the landscape which contributes to the National Historic Landmark District status, and are therefore considered unsuitable in historic landscapes. These trees include the Australian bush cherry, lemon bottlebrush, Forrest’s silver fir, atlas cedar, yew pine, and fern pine which represent approximately four percent of the total trees to be removed;

⁶ Defined in the Vegetation Management Plan (VMP) as trees that have historic value, are outstanding botanical specimens, display unique traits, or serve a particular aesthetic function in the landscape.

⁷ Defined in the VMP as species that were most likely found on the Presidio prior to European settlement. Species native to California, but not native locally to the Presidio, are considered nonnative species.



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- other trees more suitable to supplement historically planted species within the Presidio to better address the goals and objectives of the Vegetation Management Plan (NPS 1999a) would be planted as part of the landscaping plan for the new development; and
- tree replacement during nonhistoric building landscape renovation is permitted under the Vegetation Management Plan (NPS 1999a; page 59).

Proposed development activities would have no effect on proposed restoration of the drainage and riparian corridor along the western edge of the Letterman Complex, which would have a positive impact of reestablishing native plant communities. That project would be examined in a detailed plan that would include additional analysis of environmental impacts.

Because proposed development would not result in any significant impacts on native plant communities that have not been previously examined in the Presidio GMPA EIS and the following measure would be incorporated into the development, no further analysis is required.

The following mitigation measure would be adopted to maximize the beneficial impact on 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 the goals and objectives of the Vegetation Management Plan. Planning would take into account opportunities for native habitat enhancement where feasible and appropriate.

Q. Wildlife

The potential impacts of development within the Letterman Complex on wildlife are within the scope of and adequately analyzed on pages 194 through 197 of the Presidio GMPA EIS. The analysis determined that:

- Increased visitor use would cause impacts on resident wildlife species;
- Noise and disturbance associated with construction activities might temporarily disturb nesting birds;
- Other animals less tolerant of disturbance might also temporarily abandon construction sites (however, the majority of species within the Presidio are adapted to the noises of the urban environment); and
- The removal of nonnative trees at the site would decrease the number of trees available for nesting birds (however, restored native plant areas would provide new habitat for nesting birds).

Such effects were addressed by mitigation measures based on the GMPA EIS, including designation of appropriate recreational uses and use areas to limit visitor impacts on wildlife populations.

Since preparation of the GMPA, it has become known that American kestrels breed at the Presidio, and nesting pairs have been observed in palms near the LAMC (NPS 1997a).⁸ The palms also define the northern breeding limits for the hooded oriole, which nests in the trees. The coast live oak trees along the perimeter of the 23-acre site provide excellent songbird habitat for a diversity of breeding and migrant birds, including a variety of flycatchers, warblers and vireos (NPS 1998b). Despite their introduced status, the flowering eucalyptus along the historic windrows attract insects which draw migratory birds. Their branches also provide nesting sites for raptors and cavities offer habitat for cavity nesting species (NPS 1997a). The Monterey pines offer less habitat value than eucalyptus, but they also provide roosting sites for larger species and sturdy nesting sites for raptors (NPS 1997a).

⁸ No nests of this species, however, were specifically identified in spring 1994 surveys of Presidio forests (NPS 1997a).



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	Yes	No	Impact Adequately Examined	Additional Analysis Required
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Finally, the single redwood tree has higher wildlife value because other large trees surround it. Mitigation Measures WL-1 through WL-3 identified below would protect valuable habitat areas for these birds.

Because proposed development would not result in any new significant impacts on wildlife that have not been previously examined in the Presidio GMPA EIS and the following measures would be incorporated into the development, no further analysis is required.

The following mitigation measures would be adopted to control visitor use and protect and/or expand native wildlife habitat at the site.

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 wildlife habitat within the 23-acre site. These habitat areas would include the palms, the coast live oaks in the existing open space, the redwood, and the Monterey pines and eucalyptus within the historic windrows. Measures 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 it has determined that nesting activity has ended. Other preventive measures, such as the use of signing, implementation of a monitoring program, and establishment of contingency plans 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 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 development team members would be educated 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.

R. Special Status Species

The potential impacts of development within the Letterman Complex on special-status species are within the scope of and adequately analyzed on pages 198 and 199 of the Presidio GMPA EIS. The analysis determined that development would not result in any adverse effects on special-status species. Proposed development activities would have no effect on proposed restoration of the drainage and riparian corridor along the western edge of the complex, which could benefit several bat species listed as federal species of concern. That project would be examined in a detailed plan that would include additional analysis of environmental impacts. Because proposed development would not result in any new impacts on special-status species that have not been previously examined in the Presidio GMPA EIS, no further analysis is required.



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	Yes	No	Impact Adequately Examined	Additional Analysis Required
S. Topography and Soils	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The potential impacts of development within the Letterman Complex on topography and soils are within the scope of and adequately analyzed in site-specific detail on page 200 of the Presidio GMPA EIS. The analysis was based on calculations of disturbance estimated from aerial photographs and drawings. The analysis determined that a total of 15 acres of soils within the Letterman Complex would be disturbed during pavement removal, intersection improvements, landscape rehabilitation and removal of deteriorated buildings, including the medical center. Minor recontouring might also be associated with the demolition of structures and infrastructure improvements. The analysis determined that impacts would be minor and temporary because the majority of soils that would be affected have been previously disturbed by human use. Such effects were addressed by mitigation measures based on the GMPA EIS. Demolition of the research institute and underground parking as proposed under four of the six alternatives for the Letterman Complex would increase soil disturbance but would not result in any new impacts that have not been previously examined in the GMPA EIS. However, as recommended on page 200 of the GMPA EIS, site-specific plans would be developed before the initiation of work and would include in-depth assessment and quantification of the anticipated disturbances, and no additional analysis is required.

The following mitigation measure was refined from the GMPA EIS and would be incorporated into the development to effectively eliminate any unacceptable or long-term resource damage. Additional specific mitigation measures may be developed as needed.

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.

T. Air Quality	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The air quality impacts of development within the site are analyzed on pages 202 through 208 in the Presidio GMPA EIS pursuant to Bay Area Air Quality Management District (BAAQMD) guidelines. The analysis concluded that: 1) mobile-source air contaminant levels, except for carbon monoxide (CO), would continue to be exceeded because of automobile traffic in the vicinity of but not related to activities at the Presidio; and 2) the effects of proposed uses at the Presidio on regional air quality would be less than significant. Such effects were addressed by mitigation measures based on the GMPA EIS analyses. Although no alternative currently under consideration for the Letterman Complex is expected to produce numbers of future trips to the Presidio greater than what was previously analyzed in the GMPA EIS, since the time of preparation of the GMPA EIS, the significance thresholds for regional emissions published by the BAAQMD have been reduced. Therefore, additional analysis is required to re-evaluate regional air quality impacts. The analysis would compare the localized CO concentrations at the heavily congested Lombard Street/Lyon Street intersection with the state standards. It should be noted that with regard to construction impacts on air quality, the BAAQMD no longer requires that construction emissions be quantified (BAAQMD 1996).



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	Yes	No	Impact Adequately Examined	Additional Analysis Required
<p>The following measures would be incorporated into the development to reduce air quality impacts. Additional mitigation measures may be developed as needed during the NEPA process.</p>				
<p>AQ-1. <i>BAAQMD Control Measures</i> – To reduce construction-generated PM₁₀ emissions, construction contractors would be required to implement as feasible and appropriate BAAQMD’s recommended control measures for emissions of dust during construction.</p>				
<p>AQ-2. <i>Demolition of Existing Buildings</i> – To the extent feasible and appropriate, the Presidio Trust would apply the most environmentally effective approach, including a combination of deconstruction and demolition techniques, to remove outdated structures and reduce fine particulate matter (PM₁₀) emissions from demolition activities.</p>				
<p>AQ-3. <i>Transportation Measures</i> – 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.</p>				
<p>AQ-4. <i>Existing Stationary Source Permits</i> – The U.S. Army’s existing 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.</p>				

U. Noise

The noise impacts of site development are analyzed on pages 208 through 213 in the Presidio GMPA EIS pursuant to compatibility standards established by the Federal Highway Administration and the American National Standard Institute⁹. The analysis concluded that future noise levels in the Presidio would be minimally higher than at present but would not violate the San Francisco noise ordinance. Construction would be a source of increased noise on occasion. Park land uses and related internal traffic increases would not have significant impacts on noise. Noise levels at sensitive areas (including the Letterman Complex) next to Highway 101, the major source of noise at the Presidio, would not increase substantially above existing levels. However, as traffic to and from the Presidio increased, the additional traffic might extend the period during which high noise levels occurred. These minor effects were addressed by mitigation measures based on the GMPA EIS analyses.

Noise levels presented in Table 4 in the “Affected Environment” section of the GMPA EIS would require updating and re-analysis based on new noise measurements, the most recent traffic counts, and potential traffic volume increases. In addition, the analysis of construction noise in the GMPA EIS was based on the demolition and removal of about 275 buildings, not including the research institute. Because demolition of the LAIR building is now being contemplated under four of the six alternatives, the characteristics and duration of noise for demolition/construction activities at the site as currently envisioned, and the effectiveness of the mitigation measures within the GMPA EIS would need to be refined as necessary. The applicability of the San Francisco Noise Ordinance (in the Police Code) to construction noise would also need to be reviewed and further documented. Because this new information may raise new noise issues, additional analysis is required.

V. Interpretation and Education

The beneficial impacts from expanded interpretive and educational opportunities at the Letterman Complex are within the scope of and adequately analyzed in site-specific detail on page 212 of the Presidio GMPA EIS. The analysis determined that conversion of the Letterman Complex from U.S. Army medical use to a tenant-operated

⁹ For information related to noise measurements, standards and criteria, see Appendix C of the GMPA EIS.



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	Yes	No	Impact Adequately Examined	Additional Analysis Required
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research and education facility would provide new opportunities for San Francisco residents and visitors to attend educational programs and learn about advances in health and science. Because these effects were considered beneficial, no mitigation measures were identified in the GMPA EIS. Changes to the concept under the alternatives currently being considered may focus on issues other than human health, but would still be consistent with the Presidio Trust Act and the general objectives of the GMPA. Tenants would be required to include programs that acquaint visitors with history, culture and the arts, cross-cultural and international understanding, community renewal, and/or environmental stewardship and sustainability. These programs would benefit the Presidio, the participants, and the organizations and communities they represent. Because these enhancements for achieving Presidio goals would have beneficial impacts on visitor interpretation and education comparable to those previously analyzed in the Presidio GMPA EIS, no further analysis is required.

W. Recreation

The impacts on specific recreational improvements at the Letterman Complex are within the scope of and adequately analyzed on page 214 of the Presidio GMPA EIS. The analysis determined that the two tennis courts and gymnasium at the Letterman Complex would be maintained and opened to park visitors to help expand recreational opportunities throughout the Presidio. The indoor swimming pool would be used by the Sixth Army for an indefinite period with limited public access. Since preparation of the GMPA EIS, the recreational facilities have been opened to the public and are being operated by the YMCA. In addition, under several of the alternatives being considered, the tennis courts would be relocated and new facilities would be provided, which would have a beneficial impact on current users. Because no new adverse impacts to recreational programs and facilities from those previously analyzed in the GMPA EIS are expected, no further analysis is required.

X. Visual Resources

The potential visual impacts on scenic resources at the Letterman Complex are within the scope of and adequately analyzed in site-specific detail on pages 215 and 216 of the Presidio GMPA EIS. The following factors were considered in analyzing visual impacts:

- Visibility of the proposed landscape changes from major viewpoints (would the changes be seen and would they be visually conspicuous).
- Compatibility of landscape changes with the existing cultural landscape (would changes be in keeping with the historic character of the area).

The analysis determined that the Letterman Complex is not high in scenic quality. Some improvements in the visual setting at the complex would result from removal of pavement and buildings, restoration of the courtyard area behind the former administration building, and relandscaping. The analysis concluded that demolition and removal of the medical center would greatly improve views from many vantage points in the Presidio and enhance the visual integrity of the Letterman Complex but replacement construction may adversely affect scenic viewing. Additional analysis was recommended for major replacement construction, including design guidelines and building height restrictions (no building is to be higher than adjacent structures) to help minimize these impacts.

Since preparation of the GMPA EIS, these concepts have changed from those previously analyzed and new adverse impacts on scenic viewing may result. Development within the site under four of the six alternatives would necessitate demolition of both the medical center and research institute. Additional analysis within the cultural resources section of the environmental document, site-specific planning guidelines and building height restrictions required in the GMPA EIS would address all major construction, including building(s) that would replace the research institute.



A . R E V I S E D E N V I R O N M E N T A L S C R E E N I N G F O R M

	Yes	No	Impact Adequately Examined	Additional Analysis Required
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The following mitigation measures are refined from the GMPA EIS and would be incorporated into the planning guidelines to help minimize impacts on scenic viewing. Additional mitigation measures may be imposed upon the development during preparation of the planning guidelines to further reduce impacts.

VR-1. *Planning Guidelines* – The Planning Guidelines would be applied as set forth in mitigation measure CR-1 during site planning and design review to protect scenic 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).

VR-3. *Maximum Allowable Square Footage* – The maximum allowable square footage for replacement construction would not exceed the existing 1.3 million square feet.

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

Y. Human Health, Safety and the Environment

The cleanup of hazardous substances, pollutants and contaminants at the Presidio was not previously analyzed in the GMPA EIS. Rather, pages 217 through 223 of the document provided information regarding the currently known extent of contamination. As part of the Base Realignment and Closure process, the Department of the Army, with oversight by the State of California Environmental Protection Agency, is conducting assessment and clean-up activities related to hazardous substances, pollutants and contaminants at the Presidio. The Presidio is not designated as a National Priorities List site. Hazardous materials and hazardous substances defined under the Comprehensive Environmental Response Compensation Liability Act (CERCLA) do not impact the Letterman Complex. The LAMC and LAIR buildings are not identified in the Hazardous Substance Study Areas map provided on page 219 of the GMPA EIS. The prior fuel distribution system and associated storage tanks are being managed by the Army Corps of Engineers in accordance with state underground storage tank regulations. The Nuclear Regulatory Commission (NRC) completed in 1993 confirmatory radiological surveys of the LAMC and LAIR as part of its termination process. These surveys documented contamination issues, confirmed that such contamination had been remedied to NRC standards, and determined that the surveyed facilities are suitable for unrestricted use (U.S. Army 1993a, Berger 1993, Vitkus 1993). Asbestos and lead-based paint have been identified in the buildings, and would require remediation. Such remediation was addressed by mitigation measures based on the GMPA EIS.

Reports of the environmental studies conducted at the Presidio, of which the Letterman Complex is a component, can be reviewed at the information repositories maintained at Fort Baker or the San Francisco Main Library. Information about environmental remediation activities at the Presidio can be found on the World Wide Web at <http://www.presidiosanfran.com>. Because there are no changes to the development concept that would result in new information from that previously provided in the GMPA EIS, no further analysis is required.

The following mitigation measures are refined from the GMPA EIS and would be imposed upon the project to reduce impacts on human health, safety and the environment. The measures would be regularly evaluated and monitored by Presidio Trust staff to determine their effectiveness in reducing impacts and ensure compliance.

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. 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. Air sampling would be conducted during removal.



A . R E V I S E D E N V I R O N M E N T A L S C R E E N I N G F O R M

	Yes	No	Impact Adequately Examined	Additional Analysis Required
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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 U.S. 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.

In addition, the following mitigation measure would be adopted to further reduce impacts.

HH-3. *Contingency Plan* – Prior to initiating subsurface construction within the Letterman Complex, a Contingency Plan would be developed to provide a decision framework for the Presidio Trust 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, and during development of, the plan. Additionally, the Presidio Trust would coordinate with the Presidio Restoration Advisory Board.

Z. Energy Consumption

The impacts on energy consumption due to site development are within the scope of and adequately analyzed on pages 224 and 225 in the Presidio GMPA EIS pursuant to the Energy Conscious Planning Guide (NPS 1981) and NPS requirements. The analysis concluded that because of the number of buildings to be removed and the increased efficiency of rehabilitated buildings, energy consumption would be expected to decrease at the Presidio. Changes to the development under four of the six alternatives currently being considered would further reduce energy consumption because the research institute would be replaced with more energy-efficient buildings. Because there are no changes to the development concept that would result in new impacts to energy consumption facilities from those previously analyzed in the GMPA EIS and the following measure will be incorporated into the development, no further analysis is required.

The following mitigation measure is incorporated and refined from the GMPA EIS and would be imposed upon the proposed development to reduce impacts on energy consumption. The measures would be regularly evaluated and monitored by Presidio Trust staff to determine their effectiveness in reducing impacts and ensure compliance.

EC-1. *Conservation Measures* – In accordance with the energy requirements of Executive Orders 11912 and 12003, the development team would develop specific measures to minimize building energy use for each building to be constructed.



A . R E V I S E D E N V I R O N M E N T A L S C R E E N I N G F O R M

	Yes	No	Impact Adequately Examined	Additional Analysis Required
AA. Park Management and Operations	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The impacts on park management and operations at the Letterman Complex are within the scope of and adequately analyzed on pages 225 through 228 of the Presidio GMPA EIS. Since preparation of the GMPA EIS, the Presidio Trust has further analyzed potential revenues for the Presidio from the Letterman Complex. Revenue earned by leasing new mixed-use space at the site would contribute to the implementation of the GMPA, including supporting the park’s preservation, and the reduction of cost to the federal government. By 2013, when the Presidio must be financially self-sufficient, the Letterman Complex would generate at least \$5 million per year, 14 percent of the Presidio’s projected \$35.7 million annual budget. The development team would also finance site development, including demolition of the medical center and research institute, which currently exist on site. The Presidio Trust would charge a service district fee, currently set at \$2.89 annually per square foot of building area (subject to adjustment) to pay for Presidio-provided park services, such as fire protection, police protection, road maintenance, street lighting, offsite landscape maintenance, storm water discharge, and emergency medical response, and repair and rehabilitation of infrastructure systems. Because proposed development would not result in any negative impacts on park management and operations, no additional analysis is required.

BB. Cumulative Impacts	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The environmental analysis in the Presidio GMPA EIS included the cumulative effects of site development on the environment. The Presidio GMPA defined cumulative effects as the effects of the actions added to the effects of the other past, present and reasonably foreseeable plans, projects, and activities in the GGNRA and the greater San Francisco Bay Area¹⁰ (page 137). The analyses of cumulative impacts of site and other development in the Presidio that appear on the following pages of the Presidio GMPA EIS are incorporated by reference into this checklist and need not be repeated pursuant to the provisions for tiering: 167 (regional economy and the environment), 172 (city services), 175 (health care and medical research), 175 (medical aid incidents), 186 (land use, the Presidio community and surrounding neighborhoods), 194 (archeology and wetlands/stream drainages), 197 (native plant communities), 198 (wildlife), 199 (sensitive status species), 202 (topography and soils), 213 (interpretation and education), 215 (recreation), 218 (human health, safety and the environment), 225 (energy consumption), and 228 (park management and operations). Development within the site would contribute in a minor way to the referenced cumulative impacts, which were fully disclosed and adequately addressed in the GMPA EIS. Further analysis is required only for the following impact topics for which the incremental contribution of proposed development to cumulative effects addressed in the GMPA EIS may be significant: solid waste, water supply and distribution, schools, housing, traffic and transportation systems, cultural resources (including visitor experience and visual resources), air quality, and noise.

CC. Growth-Inducing Impacts	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The growth-inducing impacts on the region as the local economy and community respond to Presidio activities, including development within the Letterman Complex, are within the scope of and adequately analyzed on pages 228 and 229 in the Presidio GMPA EIS. The analysis concluded that new jobs, visitors, and planned traffic circulation and safety improvements could result in indirect growth in population and housing demand in the city and region. Because there are no changes to the development concept that would result in new growth-inducing impacts from those previously analyzed in the GMPA EIS, no further analysis is required.

¹⁰ Defined on page 88 of the Presidio GMPA EIS as the area within 50 miles of the Presidio and shown on the Regional Context map on page 89.



A . REVISED ENVIRONMENTAL SCREENING FORM

WOULD DEVELOPMENT WITHIN THE LETTERMAN COMPLEX, IF IMPLEMENTED:

	Yes	No
<p>A. <i>Have significant adverse effects on public health or safety?</i></p> <p>Please refer to the above discussion under Impact Topic Y, Human Health, Safety and the Environment.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>B. <i>Have adverse effects on such unique characteristics as historic or cultural resources, park lands, wetlands, floodplains, or ecological, significant or critical areas, including those listed on the National Register of National Landmarks?</i></p> <p>Please refer to the separate discussions under Impact Topics C (Floodplains), M (National Historic Landmark District), O (Wetlands and Stream Drainages), P (Native Plant Communities) and R (Special Status Species).</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>C. <i>Have highly controversial environmental effects?</i></p> <p>The Letterman Complex represents the largest development opportunity to be offered at the Presidio. Residents from the surrounding neighborhoods have already expressed concerns about possible future uses of the area and the effects on the community. Traffic congestion is a serious problem on nearby city streets. Increased traffic to and from the area may contribute to this congestion.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>D. <i>Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks?</i></p> <p>No potential effects or risks that meet these criteria are likely to occur.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>E. <i>Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects?</i></p> <p>The Presidio Trust is the approval agency for development within the Presidio. As lead agency under NEPA, the Presidio Trust ensures that environmental factors and concerns are given appropriate consideration in its decisions and actions, which may have potentially significant environmental effects. Each action for construction, demolition, renovation or development at the Presidio would be reviewed under its own merits and would be subject to the appropriate environmental documents under NEPA.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>F. <i>Be directly related to other actions with individually insignificant, but cumulatively significant environmental effects?</i></p> <p>Development within the site would contribute in a minor way to the cumulative impacts referenced above in Impact Topic BB, Cumulative Impacts, which were fully disclosed in the GMPA EIS. Development within the Letterman Complex may also result in cumulatively significant environmental effects on solid waste, water supply and distribution, schools, housing, medical research, national historic landmark district, traffic and transportation systems, air quality and noise.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>G. <i>Have adverse effects on properties listed or eligible for listing on the National Register of Historic Places?</i></p> <p>Please refer to the above discussion under Impact Topic M, National Historic Landmark District.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



A . R E V I S E D E N V I R O N M E N T A L S C R E E N I N G F O R M

	Yes	No
H. <i>Have adverse effects on special status species, or have adverse effects on designated Critical Habitat for these species?</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please refer to the above discussion under Impact Topic R, Sensitive Status Species.

I. <i>Require compliance with Executive Order 11988 (Floodplain Management), Executive Order 11900 (Protection of Wetlands), or the Fish and Wildlife Coordination Act (FWCA)?</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Executive Orders 11988 and 11990 direct federal agencies to enhance floodplain and wetland values, to avoid development in floodplains and wetlands whenever there is a practical alternative, and to avoid to the extent possible adverse impacts associated with the occupancy or modification of floodplains and wetlands. Development within the Letterman Complex would be compatible with these executive orders. The FWCA provides the basic authority for U.S. Fish and Wildlife Service review of water resources development projects. No “waters or channel of a body of water” would be modified during development within the Letterman Complex.

J. <i>Threaten to violate a federal, state, local or tribal law or requirement imposed for the protection of the environment?</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Replacement construction would comply with major federal laws, executive orders and regulations and associated state regulations.

K. <i>Require a permit from a federal, state or local agency to proceed, unless the agency from which the permit is required agrees a Categorical Exclusion is appropriate?</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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As directed by requirements set forth in the Clean Water Act and state regulations, discharges of storm water runoff associated with construction activity would require an NPDES permit from the San Francisco Regional Water Quality Control Board, and development of an adequate Storm Water Pollution Prevention Plan for the project.

L. <i>Have the potential for significant impact as indicated by a federal, state or local agency or Indian Tribe?</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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As discussed above, development within the Letterman Complex has the potential to have a significant impact on: solid waste; water supply and distribution; schools, housing, medical research; traffic and transportation systems; cultural resources; archeology; scenic viewing; air quality; and noise. The Presidio Trust has sought the advice and expertise of federal, state and local agencies and Indian Tribes to review its decisions about what to include in this environmental document.

M. <i>Have the potential to be controversial regardless of its impact?</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Please refer to the Response to Question C, above.



Impact Topics Requiring Additional Analysis

The proposed project may have a significant impact on the physical, natural or cultural resources checked below, requiring additional analysis as indicated by the ESF.

- | | | |
|---|---|---|
| <input type="checkbox"/> Climate | <input type="checkbox"/> Emergency Medical Services | <input type="checkbox"/> Special Status Species |
| <input type="checkbox"/> Geology and Earthquakes | <input checked="" type="checkbox"/> Schools | <input type="checkbox"/> Topography and Soils |
| <input type="checkbox"/> Floodplains | <input checked="" type="checkbox"/> Housing | <input checked="" type="checkbox"/> Air Quality |
| <input type="checkbox"/> Water Quality | <input checked="" type="checkbox"/> Healthcare and Medical Research | <input checked="" type="checkbox"/> Noise |
| <input checked="" type="checkbox"/> Solid Waste | <input type="checkbox"/> Medical Aid Incidents | <input type="checkbox"/> Interpretation and Education |
| <input type="checkbox"/> Regional Economy and Employment | <input checked="" type="checkbox"/> Traffic and Transportation Systems | <input type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Water Supply and Distribution | <input type="checkbox"/> Land Use | <input checked="" type="checkbox"/> Scenic Viewing |
| <input type="checkbox"/> Wastewater Treatment and Disposal | <input checked="" type="checkbox"/> National Historic Landmark District | <input type="checkbox"/> Human Health, Safety and the Environment |
| <input type="checkbox"/> Storm Drainage | <input checked="" type="checkbox"/> Archeology | <input type="checkbox"/> Energy Consumption |
| <input type="checkbox"/> Electricity | <input type="checkbox"/> Wetlands and Stream Drainages | <input type="checkbox"/> Park Management and Operations |
| <input type="checkbox"/> Natural Gas | <input type="checkbox"/> Native Plant Communities | <input checked="" type="checkbox"/> Cumulative Impacts |
| <input type="checkbox"/> Law Enforcement Services | <input type="checkbox"/> Wildlife | <input type="checkbox"/> Growth-Inducing Impacts |
| <input type="checkbox"/> Fire Protection Services | | |

Public Involvement and Consultation with Affected Agencies

Public involvement and scoping for the previous EIS process is discussed on pages 300 through 302 of the GMPA EIS. Since preparation of the GMPA EIS, in order to facilitate public input regarding the range of potential uses currently being considered for the site, the Presidio Trust conducted a series of public meetings during the RFQ response period (August 14, 1998 through October 12, 1998). These public meetings included two public workshops and one formal meeting of the Golden Gate National Recreation Area Citizens' Advisory Commission. A front-page article describing the RFQ process for the Letterman Complex was also featured in the September issue of the Presidio Post, the monthly publication of the Presidio Trust. The Presidio Trust conducted a public workshop on January 27, 1999 to solicit public input regarding the alternatives and the specific impacts to be evaluated in the forthcoming environmental document. Written comments were also



encouraged. The Presidio Trust announced the release of the draft document and preferred alternative for public comment by notice in the Federal Register and in local news media. The GGNRA Citizens Advisory Commission also placed the Letterman Complex on the agenda of three public meetings, which were announced in the Federal Register and in local news media.

Government agencies administering programs and activities affecting the Presidio and having participated in the preparation of the GMPA EIS are listed on pages 306 and 307 of the GMPA EIS. The Presidio Trust will continue to consult with these and other agencies during the Letterman Complex planning and implementation process. Specifically, the Trust has solicited input from these agencies as to their jurisdiction by law or special expertise on any environmental issue that should be addressed in the environmental document (Presidio Trust 1998c).

References

Please refer to Section 6, References in the EIS.



A . REVISED ENVIRONMENTAL SCREENING FORM

Determination and Signatory

On the basis of this analysis:

- I FIND THAT THE PROPOSED PROJECT **COULD NOT** HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT, AND A **CATEGORICAL EXCLUSION** WILL BE PREPARED.
- I FIND THAT THE PROPOSED PROJECT **MAY** HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT, AND AN **ENVIRONMENTAL ASSESSMENT** OR AN **ENVIRONMENTAL IMPACT STATEMENT** IS REQUIRED.
- I FIND THAT THE PROPOSED PROJECT **MAY** HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT, BUT AT LEAST ONE EFFECT 1) HAS BEEN ADEQUATELY ANALYZED IN THE EARLIER PRESIDIO GMPA EIS PURSUANT TO APPLICABLE LEGAL STANDARDS, AND 2) HAS BEEN ADDRESSED BY MITIGATION MEASURES BASED ON THE EARLIER ANALYSIS AS DESCRIBED IN THE ESF, INCLUDING REVISIONS OR MITIGATION MEASURES THAT ARE IMPOSED UPON THE PROPOSED PROJECT. A **SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT** IS REQUIRED, BUT IT MUST ANALYZE ONLY THE EFFECTS THAT REMAIN TO BE ADDRESSED.
- I FIND THAT ALTHOUGH THE PROPOSED PROJECT COULD HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT, BECAUSE ALL POTENTIALLY SIGNIFICANT EFFECTS A) HAVE BEEN ANALYZED ADEQUATELY IN THE EARLIER PRESIDIO GMPA EIS PURSUANT TO APPLICABLE STANDARDS, AND B) HAVE BEEN AVOIDED OR MITIGATED PURSUANT TO THAT EARLIER EIS AS DESCRIBED IN THE ESF, INCLUDING REVISIONS OR MITIGATION MEASURES THAT ARE IMPOSED UPON THE PROPOSED PROJECT, NOTHING FURTHER IS REQUIRED.

KAREN A. COOK
General Counsel, Presidio Trust

Date

JOHN PELKA
NEPA Compliance Coordinator, Presidio Trust

Date



Table A-1
Trees to be Protected or Removed within the 23-Acre Site

BOTANICAL NAME	COMMON NAME	NUMBER OF TREES		TOTAL
		TO BE PROTECTED	TO BE REMOVED	
<i>Abies delavayi</i> var. <i>forrestii</i>	Forrest's silver fir	1	0	1
<i>Acacia melanoxylon</i>	Blackwood acacia	1	2	3
<i>Araucaria heterophylla</i>	Norfolk Island pine	1	0	1
<i>Calistemon citrinus</i>	Lemon bottlebrush	0	3	3
<i>Cedrus atlantica</i> 'Glauca'	Atlas cedar	1	0	1
<i>Cerotonia siliqua</i>	Carob	0	8	8
<i>Eucalyptus citriodora</i>	Lemon gum	1	0	1
<i>Eucalyptus ficifolia</i>	Red flowering gum	2	0	2
<i>Eucalyptus globulus</i>	Blue gum	25	2	27
<i>Eucalyptus sideroxylon</i>	Red ironbark	0	11	11
<i>Juniperus chinensis</i>	Hollywood juniper	0	16	16
<i>Liquidambar styraciflua</i>	Sweetgum	0	3	3
<i>Magnolia grandiflora</i>	Southern magnolia	0	5	5
<i>Malus species</i>	Apple	0	3	3
<i>Maytenus boaria</i>	Mayten	0	14	14
<i>Metrocideros excelcus</i>	New Zealand christmas tree	0	5	5
<i>Phoenix canariensis</i>	Canary Island date palm	6	0	6
<i>Pinus canariensis</i>	Canary Island pine	0	7	7
<i>Pinus pinea</i>	Italian stone pine	0	122	122
<i>Pinus radiata</i>	Monterey pine	35	32	67
<i>Pittosporum eugeniodes</i>	Tarata	3	0	3
<i>Pittosporum undulatum</i>	Victorian box	1	48	49
<i>Podocarpus gracilior</i>	Fern pine	0	2	2
<i>Podocarpus macrophyllus</i>	Yew pine	0	2	2
<i>Prunus serrulata</i>	Flowering cherry	0	2	2
<i>Quercus agrifolia</i>	Coast live oak	11	0	11
<i>Quercus ilex</i>	Holly oak	0	23	23
<i>Schinus molle</i>	California pepper	0	1	1
<i>Sequoia sempervirens</i>	Coast redwood	1	0	1
<i>Syzygium paniculatum</i>	Australian bush cherry	0	4	4
<i>Ulmus parvifolia</i>	Chinese elm	0	2	2
<i>Washingtonia robusta</i>	Mexican fan palm	2	0	2
	Total	91	317	408

Source: Hortscience, Inc. 2000



Table A-2
Additional Information on Trees within the 23-Acre Site

BOTANICAL NAME	COMMON NAME	HERITAGE LANDMARK TREE	HISTORIC LANDSCAPE FEATURE ¹	NATIVE SPECIES ²	WILDLIFE HABITAT VALUE ³	CONDITIONAL- OR RESTRICTED-USE SPECIES	HISTORICALLY INAPPROPRIATE SPECIES
<i>Abies delavayi</i> var. <i>forrestii</i>	Forrest's silver fir	No	No	No	Low	No	Yes
<i>Acacia melanoxylon</i>	Blackwood acacia	No	No	No	Low	Yes	No
<i>Araucaria heterophylla</i>	Norfolk Island pine	No	No	No	Low	No	No
<i>Calistemon citrinus</i>	Lemon bottlebrush	No	No	No	Low	No	Yes
<i>Cedrus atlantica</i> 'Glauca'	Atlas cedar	No	No	No	Low	No	Yes
<i>Ceronia siliqua</i>	Carob	No	No	No	Low	No	No
<i>Eucalyptus citriodora</i>	Lemon gum	No	No	No	Low	No	No
<i>Eucalyptus ficifolia</i>	Red flowering gum	No	No	No	Low	No	No
<i>Eucalyptus globulus</i>	Blue gum	No	Yes	No	High	Yes	No
<i>Eucalyptus sideroxylon</i>	Red ironbark	No	No	No	Low	No	No
<i>Juniperus chinensis</i>	Hollywood juniper	No	No	No	Low	No	No
<i>Liquidambar styraciflua</i>	Sweetgum	No	No	No	Low	No	No
<i>Magnolia grandiflora</i>	Southern magnolia	No	No	No	Low	No	No
<i>Malus species</i>	Apple	No	No	No	Low	No	No
<i>Maytenus boaria</i>	Mayten	No	No	No	Low	No	No
<i>Metrocideros excelcus</i>	New Zealand Christmas tree	No	No	No	Low	No	No
<i>Phoenix canariensis</i>	Canary Island date palm	No	Yes	No	High	No	No
<i>Pinus canariensis</i>	Canary Island pine	No	No	No	Low	No	No
<i>Pinus pinea</i>	Italian stone pine	No	No	No	Low	No	No
<i>Pinus radiata</i>	Monterey pine	No	Yes	No	Moderate	Yes	No
<i>Pittosporum eugenoides</i>	Tarata	No	No	No	Low	No	No
<i>Pittosporum undulatum</i>	Victorian box	No	No	No	Low	No	No
<i>Podocarpus gracilior</i>	Fern pine	No	No	No	Low	No	Yes
<i>Podocarpus macrophyllus</i>	Yew pine	No	No	No	Low	No	Yes
<i>Prunus serrulata</i>	Flowering cherry	No	No	No	Low	No	No



Table A-2
Additional Information on Trees within the 23-Acre Site

BOTANICAL NAME	COMMON NAME	HERITAGE LANDMARK TREE	HISTORIC LANDSCAPE FEATURE ¹	NATIVE SPECIES ²	WILDLIFE HABITAT VALUE ³	CONDITIONAL- OR RESTRICTED-USE SPECIES	HISTORICALLY INAPPROPRIATE SPECIES
<i>Quercus agrifolia</i>	Coast live oak	No	No	Yes	High	No	No
<i>Quercus ilex</i>	Holly oak	No	No	No	Low	No	No
<i>Schinus molle</i>	California pepper	No	No	No	Low	No	No
<i>Sequoia sempervirens</i>	Coast redwood	No	No	No	High	No	No
<i>Syzygium paniculatum</i>	Australian bush cherry	No	No	No	Low	No	Yes
<i>Ulmus parvifolia</i>	Chinese elm	No	No	No	Low	No	No
<i>Washingtonia robusta</i>	Mexican fan palm	No	Yes	No	High	No	No

1 Determined through the Letterman Complex Planning Guidelines.

2 Species native to California, but not native locally to the Presidio, are considered nonnative species.

3 Based on observed bird use and diversity within the Letterman Complex and the Presidio.



Table A-3
Age and Condition of Trees by Species

BOTANICAL NAME	COMMON NAME	AGE CLASSES				CONDITION CLASSES					
		SAPLING	JUVENILE	MATURE	OVER-MATURE	VERY POOR	POOR	FAIR	GOOD	EXCELLENT	
<i>Abies delavayi</i> var. <i>forrestii</i>	Forrest's silver fir			1					1		
<i>Acacia melanoxylon</i>	Blackwood acacia			3			1	1	1		
<i>Araucaria heterophylla</i>	Norfolk Island pine			1				1			
<i>Calistemon citrinus</i>	Lemon bottlebrush			3				3			
<i>Cedrus atlantica</i> 'Glaucua'	Atlas cedar			1					1		
<i>Ceratonia siliqua</i>	Carob			8			1	6	1		
<i>Eucalyptus citriodora</i>	Lemon gum			1				1			
<i>Eucalyptus ficifolia</i>	Red flowering gum			1	1		1	1			
<i>Eucalyptus globulus</i>	Blue gum			27			1	25	1		
<i>Eucalyptus sideroxylon</i>	Red ironbark			11			1	1	4	5	
<i>Juniperus chinensis</i>	Hollywood juniper			16						16	
<i>Liquidambar styraciflua</i>	Sweetgum			3				1	1	1	
<i>Magnolia grandiflora</i>	Southern magnolia			5				1	2	2	
<i>Malus species</i>	Apple			3				1	2		
<i>Maytenus boaria</i>	Mayten			14				1	7	6	
<i>Metrocideros excelsus</i>	N. Z. Christmas tree			5					1	4	
<i>Phoenix canariensis</i>	Canary Island date palm		1	5						5	1
<i>Pinus canariensis</i>	Canary Island pine			7					1	6	
<i>Pinus pinea</i>	Italian stone pine			122				6	40	73	3
<i>Pinus radiata</i>	Monterey pine			53	14			12	51	4	
<i>Pittosporum eugeniodes</i>	Tarata			3						3	
<i>Pittosporum undulatum</i>	Victorian box		2	46	1			13	19	17	
<i>Podocarpus gracilior</i>	Fern pine			2					1	1	
<i>Podocarpus macrophyllus</i>	Yew pine			2					1	1	
<i>Prunus serrulata</i>	Flowering cherry			2				1	1		
<i>Quercus agrifolia</i>	Coast live oak			11					4	5	2
<i>Quercus ilex</i>	Holly oak			23			1	8	7	7	
<i>Schinus molle</i>	California pepper			1					1		
<i>Sequoia sempervirens</i>	Coast redwood			1						1	
<i>Syzygium paniculatum</i>	Australian bush cherry			1	3			3	1		
<i>Ulmus parvifolia</i>	Chinese elm			2						2	
<i>Washingtonia robusta</i>	Mexican fan palm			2					2		
	Total	0	3	386	19	2	52	184	164	6	

Source: HortScience, Inc 2000

