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**ATTACHMENT 1**  
**MONITORING AND ENFORCEMENT PROGRAM**

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**ATTACHMENT 1  
MONITORING AND ENFORCEMENT PROGRAM**

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

<sup>1</sup> As discussed in the Presidio Trust’s *Presidio Tenant Handbook*.



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



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

<sup>2</sup> The numbers for water savings in parentheses are Presidio-wide estimates.



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

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



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



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



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

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



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



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Impact of Construction Equipment and Vehicles (Mitigated by TR-5)	TR-5. <i>Construction Traffic Management Plan</i> – Prior to construction, a Construction Traffic Management Plan shall be prepared by the contractor(s) and submitted for Trust approval. The plan shall include information on construction traffic scheduling, proposed haul routes, permittee parking, staging area management, visitor safety, and detour routes. As discussed in mitigation measure SW-1, <i>Waste Reduction Goals</i> , the LAMC and LAIR shall be deconstructed and building materials shall be reused to the extent feasible, thus minimizing the transport of demolition debris. The contractor(s) shall limit the transport of demolition debris and construction equipment and materials to periods of off-peak traffic whenever possible. Construction equipment, including trucks, shall be restricted from accessing Lyon Street to minimize additional traffic on the surrounding neighborhood roadways and intersections. Since construction activities associated with the project will likely overlap in some degree with other planned projects in the site vicinity, the contractors for such other projects will be required to coordinate with the development team of the 23-acre site to address vehicle routing, traffic control, and pedestrian movement in the vicinity of the Letterman Complex. Any significant alterations to the Construction Traffic Management Plan shall be subject to written approval by the Presidio Trust prior to implementation.	Construction Traffic Management Plan Submittal Prior to Demolition Phase (Presidio Trust/Letterman Complex Tenant)	Presidio Trust Project Manager in Coordination with Presidio Trust Transportation Manager	Approval of Construction Traffic Management Plan	Require as Conditions for Demolition and Construction Permits	
<b>Cultural Resources</b>						
Effect on Historic Setting due to New Construction (Adverse Effect Avoided by CR-1)	CR-1. <i>Planning and Design Guidelines</i> – Under provisions of the NHPA, a Programmatic Agreement (PA) has been developed in consultation with the California State Historic Preservation Officer (SHPO), the Advisory Council on Historic Preservation (ACHP) and the NPS regarding the Deconstruction, New Construction, and the Execution of Associated Leases at the Letterman Complex. Provided for in the PA are significant roles for these entities in the process of developing design guidelines, conceptual design documents and schematic design documents; also provided for in the PA are significant roles for these agencies in the construction monitoring process. In addition, the PA contains opportunity for public input, methodologies for addressing archeological properties, discoveries and unforeseen	Conceptual Design and Schematic Design Review Submittals (Letterman Complex Tenant)	Presidio Trust Project Manager in Consultation with Presidio Trust Compliance Manager, SHPO, ACHP and NPS	Review of Project Documents per the PA	Required Pursuant to the PA	



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	<p>effects, and a requirement of mandatory notification to the Secretary of the Interior and invitation for the Secretary to participate in consultation where there may be an adverse effect on historic properties.</p> <p>The Final Planning Guidelines, which have been publicly reviewed and finalized as part of the EIS, will be merged into the Design Guidelines, which are now under development and have been submitted to the SHPO for review and comment as part of the NHPA’s Section 106 consultation process. The Final Planning and Design Guidelines shall therefore be applied and continue to provide direction through the consultation and design review process under the PA where there will be continuing review of their application by the ACHP, SHPO, NPS, and the public after the environmental review process for this action is concluded.</p> <p>The Planning Guidelines and Design Guidelines for new construction at the Letterman Complex shall be utilized by the Presidio Trust in its review of an undertaking’s effect on the character of the historic district. In addition, incorporation of sustainability provisions within the guidelines shall assist the Presidio in meeting sustainability goals. The criteria in the Planning and Design Guidelines shall guide all replacement construction of buildings (e.g., massing, scale, heights, roof forms, colors, and materials.) The guidelines shall conform to <i>The Secretary of the Interior’s Standards for the Treatment of Historic Properties</i>. New buildings and landscape features shall be designed and sited to be compatible with and enhance the historic setting. Historic buildings shall be rehabilitated in accordance with <i>The Secretary of the Interior’s Standards for the Treatment of Historic Properties</i>, including the <i>Guidelines for Rehabilitating Historic Buildings</i>. In accordance with the PA, copies of the guidelines (as well as public comments received on their content) shall be sent to the SHPO for review.</p> <p>The Planning and Design Guidelines are neither technical nor prescriptive, but are intended to promote new construction that is compatible with the Presidio as a National Landmark District</p>					



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

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



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



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



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

**Topography and Soils**

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



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



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



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

