



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

June 9, 2009

John Pelka
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

Subject: Presidio Trust Management Plan Main Post Update Supplement to a Draft Supplemental Environmental Impact Statement (SDSEIS), San Francisco, California [CEQ #20080227]

Dear Mr. Pelka:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's (CEQ) NEPA Implementation Regulations at 40 CFR 1500-1508, and our NEPA review authority under Section 309 of the Clean Air Act.

We have rated the SDSEIS as EC-2 – Environmental Concerns - Insufficient Information (see enclosed "Summary of Rating Definitions"). In October 2008, EPA reviewed the Main Post Update DSEIS and expressed a lack of objections to the preferred alternative. Since then, the Presidio Trust has produced the SDSEIS, which updates the DSEIS to take into account several additional proposals that had not been fully contemplated in the DSEIS; and the National Park Service has released its April 6, 2009 Section 213 Report, which was prepared for the Advisory Council on Historic Preservation. The Section 213 Report indicates that the cumulative effects of the proposed project, together with previously approved projects in the Main Post and adjacent area, "will seriously threaten the integrity of the Main Post, the historic core of the National Historic Landmark District, to a degree that cannot be mitigated to an acceptable level, which would significantly diminish the integrity of the Presidio of San Francisco National Historic District" and that revisions to the preferred alternative may be needed to minimize or avoid such adverse effect. Although historic preservation is not EPA's area of expertise, we are concerned that, because the Section 213 Report was not available when the SDSEIS was produced, the SDSEIS does not fully address the cumulative effects of the proposed project on historic resources. In addition, we have some concerns regarding air quality matters that should be addressed in the Final EIS.

EPA understands that the Presidio Trust is working with the Advisory Council on Historic Preservation, State Historic Preservation Officer, National Park Service, and several consulting and concurring parties to develop a programmatic agreement (PA) to avoid, minimize, or mitigate adverse effects of the project on the National Historic Landmark District. This process may result in further changes to the proposed project. Furthermore, it appears that much of the information that should be included in the Final EIS will be addressed in, or determined by, the PA. For these reasons, we recommend the Final EIS not be prepared until the PA is signed, and that the PA be included as an appendix in the Final EIS. If significant revisions are made to the preferred alternative that have not been evaluated in the current SDSEIS, the Presidio Trust should consider preparing a revised Draft EIS to ensure the public has sufficient opportunity to weigh in on the new alternative(s).

With regard to air quality impacts, the SDSEIS refers to the Presidio Trust Management Plan (PTMP) EIS, which found that, based on the scale of the proposed demolition and construction activities, it is highly unlikely that the conformity applicability threshold would be exceeded by construction activities during any single year of the phased build-out. We note, however, that the current SDSEIS revises the PTMP, and the construction and demolition emissions projections for the preferred alternative are not provided in the PTMP EIS nor the SDSEIS. In our June 24, 2002 comments on the PTMP Final EIS, we recommended that the Presidio Trust revisit the conformity issue in the NEPA analyses for any future PTMP projects tiered to the PTMP EIS. The Final EIS should provide the emissions projections for construction and demolition activities under the various alternatives, including the preferred alternative.

In December 2008, former EPA Administrator Stephen L. Johnson signed a Federal Register notice making final designations of which areas of the country met or did not meet the 2006 particulate matter National Ambient Air Quality Standards, or PM NAAQS. The San Francisco Bay Area was listed in that notice as a non-attainment area. Although the Federal Register notice has not been published and, therefore, no effective date is yet established for such areas, we recommend that the Presidio Trust consider measures to minimize the project's PM_{2.5} emissions, and address this in the FEIS.

The SDSEIS indicates that the Presidio Trust will continue to implement components of the existing Transportation Demand Management program or adopt more aggressive strategies. We reiterate our support for adoption of strategies that will increase shuttle and transit usage and reduce hotspot emissions of air pollutants near sensitive receptors such as school, child care facilities, and senior housing. We encourage the Presidio Trust to work with local agencies to develop and implement such strategies.

The Final EIS should also provide more detailed information on how mitigation measures will be implemented and funded. If mitigation implementation or anticipated success is questionable (e.g., because of the need for another entity to implement it or because funding is uncertain), this should be noted and discussed in the Final EIS.

We appreciate the opportunity to review this SDSEIS, and request a copy of the Final EIS when it is officially filed with our Washington, D.C., office. If you have any questions, please call me at (415) 972-3521 or Jeanne Geselbracht at (415) 972-3853.

Sincerely,

/s/

Kathleen M. Goforth, Manager
Environmental Review Office

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Enclosure: "Summary of Rating Definitions"

Cc: Elaine Jackson-Retondo, National Park Service
Kathryn Kerr, Advisory Council on Historic Preservation
Wayne Donaldson, State Historic Preservation Officer