



BOARD OF DIRECTORS

NATIONAL ENVIRONMENTAL POLICY ACT IMPLEMENTATION POLICY

1. Purpose. This National Environmental Policy Act Implementation Policy ("Policy") establishes principles the Trust will follow in implementing the National Environmental Policy Act ("NEPA"). This policy shall be effective immediately upon approval by the Board.
2. Objective. The Presidio Trust's objective in adopting this Policy is to ensure that environmental factors, along with economic and technical considerations, are given appropriate consideration in decision-making which may impact the Presidio's historic, cultural, and natural environment.
3. Legal Authority. This Policy is developed pursuant to the Presidio Trust Act, 16 U.S.C. 460bb note ("Trust Act" or "Act"). The Trust Act vests the Trust with responsibility to manage the property, lands, and facilities within Area B of the Presidio. Section 104(c) of the Act directs the Trust to develop a comprehensive program for management of those lands and facilities within the Presidio which are transferred to the administrative jurisdiction of the Trust. In carrying out this program, the Trust must comply with NEPA (42 U.S.C. 4321, et seq.) which sets forth procedures to ensure that all branches of government give proper consideration to the environment prior to undertaking any major federal actions that significantly affect the environment.
4. Applicability. This Policy applies to all environmental reviews and decision-making by the Trust required under NEPA.
5. Delegation of Authority. Subject to the provisions of this Policy, the Chief Executive Officer, acting as Agency Head, is delegated authority as follows:
 - 5.1 The Chief Executive Officer is responsible for ensuring Trust compliance with NEPA.
 - 5.2 The Chief Executive Officer has authority to establish and revise procedures to carry out the obligations of the Trust under NEPA. The CEO may delegate this power further in accordance with a written procedure approved by the CEO.
 - 5.3 The Chief Executive Officer is authorized to make decisions on actions proposed by the Trust, such as Categorical Exclusions, Findings of No Significant Impact (resulting from Environmental Assessments), and Records of Decision (resulting from Environmental Impact Statements). The Chief



Executive Officer may delegate the decision-making authority for Categorical Exclusions in accordance with a written procedure approved by the CEO.

6. Key Principles. The Trust shall follow these key principles when implementing NEPA.
 - 6.1 Consistency with NEPA, as amended by the Fiscal Responsibility Act of 2023 and any future amendments.
 - 6.2 Consistency with guidance issued by the Council on Environmental Quality and applicable law.
7. Implementation. Management shall develop, and amend as needed, procedures to implement this policy and post them to the Trust's public website.