

4 Consultation and References

The PTMP, the comprehensive land use plan for Area B of the Presidio upon which the PHSH project proposal is based, was itself subject to an extensive public process.¹ In responding to public comments on the Draft PTMP and EIS, the Trust made several refinements to the Plan and EIS, including addressing issues specific to the PHSH district. The responses to public comments resulted in adding greater specificity to the PHSH district, stating a preference for residential uses within the main hospital building, and committing to commemorate the former Marine Hospital Cemetery. The Plan also committed to continued public process as the Plan was implemented. This EA affords the public that opportunity for the PHSH project proposal.²

The PHSH project now under review in this EA is the first major historic building rehabilitation and potential new construction project within the NHLD since the Trust's adoption of the PTMP. The Trust initially announced the PHSH project in a feature article in the April/May 2003 Presidio Post, the Trust's bi-monthly newsletter with over 17,000 readers interested in park activities. The Presidio Post article made known the Trust's proposal to revitalize and reuse the PHSH district's buildings, and to solicit offers from qualified organizations interested in redeveloping the project site and rehabilitating some or all of its historic structures. A detailed summary of the concurrent leasing and environmental review process for the PHSH project is provided in the Introduction, and more details about project scoping are described below.

4.1 PUBLIC SCOPING

4.1.1 Background

The Trust encouraged the participation of interested individuals, organizations, and agencies as part of the scoping process for the PHSH EA. An announcement in the August/September 2003 Presidio Post urged members of the public to become part of the project mailing list to receive PHSH announcements and the EA. Notice of the project and EA was also published in the Federal Register on September 9, 2003 (68 FR 53205). Scoping for the project began on August 27, 2003, at which time the Trust widely distributed for public review and comment its notice to prepare an EA and an information packet describing the project, issues, potential impacts, and potential alternatives to be addressed in the EA (see Appendix B).

As part of the scoping process, the Trust held two public Trust Board meetings, the first on October 29, 2003 at which time the Board accepted oral scoping comments, announced a second public meeting, and

¹ For a chronological discussion of the public involvement program for the PTMP and EIS, refer to the Record of Decision for the PTMP (Trust 2002c).

² For a detailed discussion of the public comments, responses, and changes made to the PHSH district during the PTMP planning and environmental review process, refer directly to Responses to Comments PG-4 through PG-9 in the PTMP Final EIS (Volume II), pages 4-87 to 4-90.

extended the public comment period (68 FR 64151). Of the approximately 166 individuals attending the first public meeting, 27 spoke. The meeting was summarized in an article that appeared in the November/December 2003 Presidio Post. At the Board's second public meeting held on December 10, 2003, approximately 114 individuals attended and 35 speakers directly addressed the Board with comments on the PHSH project.

In addition, during the scoping period, the Trust presented the project at a number of other meetings, site visits, building tours, and activities with government agencies, City supervisors of districts adjacent to the Presidio, neighborhood associations, natural resource conservation organizations, historic preservation groups, city planning organizations, neighbors, and others (see Section 4.3, List of Persons and Agencies Consulted, for a partial listing). At these forums, the Trust listened to public concerns about the project and answered questions where possible. The Trust also provided timely information updates and notices concerning the project through postings on its website at www.presidio.gov.

The extended scoping period (105 days), which originally would have expired on November 26, closed on December 10, 2003. The Trust Board offered almost four months of public scoping to provide greater opportunities for public and agency participation in the project planning process. By the end of the scoping period or shortly thereafter, in addition to oral comments heard at the Trust Board meetings, the Trust received a total of 195 written comment letters, including two petitions with 69 and 18 signatures, respectively.³

4.1.2 Summary of Issues Raised

Almost half (93) of the 216 commenters expressed disapproval of the project. Of these, most were residents adjacent to the Presidio who had concerns about the size of the project and the resulting traffic and parking effects on their neighborhood. About 15 percent (31) of the commenters offered general support for the project and redevelopment of the area, yet many of those also expressed interest in changing aspects of the project, such as minimizing the size of the development. The remaining 92 commenters had no stated position.

With eight neighborhood organizations commenting, and 113 individuals having addresses with ZIP codes bordering the Presidio, the majority of commenters could be considered neighbors living in the general vicinity of the PHSH district, i.e., the Richmond, Presidio Heights, and Cow Hollow neighborhoods. Of the remainder, 28 commenters live elsewhere in San Francisco, 17 live elsewhere in the Bay Area, 1 lives outside the Bay Area, 1 lives outside California, and 56 provided no address.

The majority of commenters (142) identified themselves as neighbors of the Presidio. Seven commenters identified themselves as volunteers or park users, and only two commenters said they were Presidio residents or had worked within the Presidio. One commenter was a student. The remaining 64 commenters did not identify themselves.

³ These letters are available for public review at the Presidio Trust Library, 34 Graham Street (Main Post).

A list of commenters on the project is provided in Table 22. If more than one written letter or oral comment was received from a particular agency, organization, or individual, the number of comments is noted in brackets next to their name.

Table 22. Public Agencies, Organizations, and Individuals Commenting on the PHS Project

Public Agencies	United States Department of the Interior, National Park Service, Golden Gate National Recreation Area (NPS)	
	United States Department of the Interior, Fish and Wildlife Service (USFWS)	
	United States Environmental Protection Agency, Region IX (EPA)	
	California Department of Transportation (Caltrans)	
	San Francisco County Transportation Authority (SFCTA)	
	City and County of San Francisco Department of Parking and Traffic (DPT)	
Elected Officials	Jake McGoldrick, City Supervisor (2)	
	Jackie Speier, CA State Senator, 8 th District	
	Leeland Y. Yee, Assembly Member, 12 th District	
Neighborhood Organizations	Cow Hollow Neighbors in Action	
	Jeffery Judd, on behalf of the Homeowners and Residents Adjacent to PHS (petition with 69 signatures)	
	Lake Street Residents Association (LSRA) (2)	
	Neighborhood Associations for Presidio Planning (NAPP) (5)	
	Pacific Heights Residents Association (PHRA)	
	Planning Association for the Richmond (PAR) (4)	
	Richmond District Neighborhood Center	
	Richmond Presidio Neighbors (RPN) (2)	
Natural Resource Conservation Organizations	Golden Gate Audubon Society	
	People for a Golden Gate National Recreation Area	
	Stuart Flashman, on behalf of the Sierra Club (2)	
Historic Preservation Organizations	California Heritage Council (CHC)	
	Fort Point and Presidio Historical Association (Fort Point) (2)	
Individuals		
Group of Neighbors (petition with 18 signatures)	Marvin Brook	Phil Chen
Anonymous	David Bunim	Peter R. Chernik
Kathy Aizawa	Mary Bull	Nicky Chiuchiarelli
Edward Alazraqui (2)	Lotta Bystrom and Lars Johansson	Richard H. Chow (2) and Jane J. Su
Michael Alexander (2)	Pat Cannon	Nancy Clark
David Armstrong	John Callan	Josiah Clark
Hilary Billings	Bruce Callander	Terry Coddington
Kenneth Bloch	Peter Carroll	V.R. Cole
John Brooke	Laura Carroll (2)	Steven Courlang
Jan Blum (2)	Kevin Castner	Francisco Da Costa (3)
William Bonham	Rhonda Chang	Jean and Erich Davids
Cheryl Brinkman	Julie Cheever	Brian and Leslie Davis
Anna Brockway	Anne Chen	Cecil Dawoodiak

Adam Dierkhising
Patricia and Gerald P. Dodson
John Doxey
Judith Dunham
Lewis Ellingham
Steven Eng
Paul Epstein (2)
Christina Farren
Thomas Farren
Carey Feierabend
Cornelia Foster
Carolyn and Jim Forsyth (2)
Lanette and Ronald Frostestad
Bill Gannon
Phillip Gordin
Bill Gorman
Ruth Gravanis
Helen A. Green
Dorothy Gregor
Elliot Grossbard, M.D.
Laura Gurmar and Vladimir
Churov
Robert N. Hall
Todd Heffelfinger
William E. Henslin, Jr. (2)
Sharon Herman
Donald Heyneman
Paul Hidy
Mark Higbie (2)
Ken and Gail High
Julian Hoekken
Charles Holden
Rusty Holden
Alan Hopkins
Ellen Horstein
Dave Hultman
Jay and Marcia Hunt
Bruce H. Jackson
Eloise Jonas and Frank
White (2)
Steve Jones
Jeffery Judd (2) and Colleen
Prince
Campbell Judge
Sharon Kato
Richard Keenan (2)
Redmond Kernan
James B. Kilgore
Susan Kilgore
Patrick Kiss
Gretchen Knoll
Alice Knox
Chuck and Helen Lantz
Mrs. Lanning

Eva Lee
Minor Leongas
Emily and William Leider
Anton Lethin
Meagan Levitan
Andrea Lewin
Claudia Lewis
Martin and Elinor Liberman
Charles Ling
Minnete Liman
Carson Lovell
Neil Lynch
Glenn McCrae
Kathleen McNamara
John Maccabee
Jerry Mapp
Lillian Maremont
Robert Martinez
Maria Matsui
Evelyn Maye
Amy Meyer
Stephen Meyers
Robert Minkowsky
Carlos E. Monfiglio
Neil Monnens
Ryan Monaghan
Margaret Moran
The Morimoto-Minnich
Family
Miki Nakanishi
Kelly Neil
Philippa Newfield
Karl Olson
Diane Osoio
Christine Pallato
Sally Palmer (2)
Barbara Paschke
Stephanie Peek
Ann Pinkerton
David Rice
Dan Richman
Kate and Zeb Ripple (2)
Fred Rinne
Erin Roach
Shirlee Roman
Mark Sachleben
Geffen Sagee
Michele Sahl
Robert and Alicia Sakai
Brooke Sampson
John-Austin Saviano
Woody Scal (2)
Jim and Laura Schlueter
Scott D. Schwartz

Geoffrey B. Sears
Judith Segard Hunt (3)
J.J. Seiler
Jean Seto
Kevin Shannon
Michael Shough
John P. Shuhda
Richard Smith
Timothy Smith
Irene Solomon
Eric Solomon
Anna Sojourner
Karen Stark
Robert F. Starzel
Benjamin Stigler
Daniel Stone
Lynn Strandberg
Wai Sui
Lynda Sullivan
Maria Susa
Eric N. Swagel, M.D.
Sarah Sweedler
Nathan Szajnberg
Kim Tan
Mark P. Tellini (2)
Lynn Terry
Jana Thompson
Tracy Thompson
Yat-Ping Tong
Jane Totten
Sharon Tsiu
Mike Van Dyke (3)
Joanne Vlatinich
Max Vlatinich
Jed and Jana Wakefield
Arnold Wasserman
Mark Weinstock (3)
Ann Weinstock (2)
Alana Weinstock
William and Helena Wheeler
Vicki Wilderman
Lawrence Wilkinson
Russell S. Wilson
Jesa Wolf
Evelyn Wong
S. Wu
Nathaniel Wyatt
Dorian Young
Herb and Jane Young
Nicholas Zaldersom
Margaret K. Zegart (3)
Matthew and Joanne Zlatunich

The written and oral comments addressed the following topic areas:

Need for Alternate Direct Access to PHS and other Traffic Issues	162 comments
Size of the PHS Development	150 comments
General Opinion of Project	119 comments
Public Safety	50 comments
Development at Battery Caulfield	44 comments
Protection of Quail Habitat	35 comments
Miscellaneous Natural Resource Issues	34 comments
Need for Adequate On-site Parking	29 comments
Type of Land Use	23 comments
Site Planning and Remediation	21 comments
Treatment of Historic Hospital Building	18 comments
Financial Requirements	15 comments
Planning and NEPA Processes	14 comments
Miscellaneous Historic Resource Issues	13 comments
Improvement of Visitor Experience and Recreational Use	8 comments
Cumulative Impacts	3 comments

The Trust carefully reviewed all comments and has taken them into account in preparing this EA. The comments have led to, among other changes, inclusion of the Park Presidio Access Variant, reduction in the size of two of the project alternatives, identification of the Preferred Alternative that does not include development at Battery Caulfield, and numerous specific textual discussions and analyses in Sections 1, 2, and 3. Some of the key issues raised during scoping are summarized below, together with a brief response regarding how the issues have been addressed in the EA.

Financial Requirements – The Sierra Club, NAPP, PAR, Fort Point and Presidio Historical Association, and others suggested that by stating a \$1 million annual base rent minimum, the Trust has effectively foreclosed the possibility of a smaller alternative (Alternative 3) for the project. They stressed that the base rent criterion could compromise the non-financial goals of the project. They also asserted that the \$1 million value is arbitrary, asked how it was determined, and claimed that stating any figure is premature until the EA is complete. A few commenters asked the Trust to explore funding certain costs to improve the financial return of the project.

Response. The Trust’s goal, as stated in the RFQ and RFP and at public meetings during the scoping process, is to implement a project for the site that meets or balances all of the stated objectives – financial and all others. The Trust Act requires that the Trust give priority to prospective tenants that facilitate the cost-effective preservation of historic buildings through their reuse and seek tenants who can help the Trust meet its financial goals. Generating revenue from parkland assets has been a controversial idea from its inception, when the Trust Act was passed. Nonetheless, the Trust believes that by generating rent by leasing buildings within the district, the Trust can make progress toward its statutory mandate and the PTMP’s stated goals. A long history of evidence supports the Trust’s statement of \$1 million minimum rent value for the PHS project and the belief that this rent value would permit consideration of a full

array and varied mix of development proposals. Because the issue is so misunderstood, it warrants more detailed discussion.

No evidence has been presented that generating a minimum of \$1 million in annual base rent conflicts with any of the other project objectives or precludes any of the alternatives analyzed, including the smallest alternative. In fact, the analysis contained in this EA supports the opposite conclusion. The financial comparison of EA alternatives shows that all, including Alternative 3 (275,000 square feet), are feasible and have the potential to generate at least \$1 million in annual base rent. No alternatives have been foreclosed from selection.

The base rent criterion was not intended and has not been used by the Trust as a limitation. For an expensive project like the PSHH project to be successful, the Trust needs to attract a highly experienced development partner with the relative financial wherewithal to raise large amounts of capital and to work out an economically feasible project if one is possible. The statement of a minimum base rent was a means for the Trust to define the level of necessary financial sophistication of a development partner for a complex historic preservation project like the PSHH, not a means to define the size of the project. Setting a minimum annual base rent is a common real estate practice used to ground a lease offering at a realistic level. Here, the \$1 million should be understood as an initial guide and not as a goal. The figure is one among other criteria for the Trust to use in identifying potential project proponents who are serious about continuing in the development process and negotiating reasonable business terms, regardless of the eventual specifics of the selected project proposal.

The Trust made clear early in the process that it was interested in any well-considered proposal and that the annual base rent figure in no way limited the range of proposals that would be evaluated. In written response to questions on the RFQ and RFP from potential development teams, the Trust dispelled the notion that it had any specific project preference.⁴ One response noted, “As previously stated, the Trust has no preference for a specific project. The Trust will consider projects falling within the range permitted in PTMP, from maximum demolition with no new construction to maximum demolition with the permitted maximum new construction and any proposal in between.”

In addition to these written responses, the Trust clarified the issue at a number of public forums. In response to questioning, the Trust stated that all proposals received would be considered. When asked whether a proposal yielding less than \$1 million annual base rent would be given consideration, the Trust again responded that any such proposal would be considered along with any and all others received. When a proponent team asked about the permissibility of multiple proposals, the Trust responded, “The Presidio Trust will not limit the number of proposals submitted or prohibit proposals identifying multiple schemes.”⁵ Implicit in Trust responses was the understanding that some proposals would be more responsive on some project criteria than others, and that financial contribution was only one among many other criteria to be considered.

⁴ See RFP Addendum No. 2, Response to Question Q.5; RFQ Addendum No. 2, Response to Question Q.5; and RFP Addendum No. 4, Q.1.

⁵ See RFP Addendum 2, Response to Question Q.4.

Some commenters suggest that the Trust should have required developers to submit the smallest development alternative. In response, Trust staff explained that the developer proposals reflect a negotiating position rather than the final project. At this stage in the process, the Trust understands that the inherent bias of any development team is to maximize its return on investment. This can be achieved by offering the largest project the team believes is acceptable while giving up the lowest possible revenue to the Trust. The developers' present proposals are a starting point in the negotiations, and the final project will not be determined until the environmental review process is complete. The Trust Board has recently identified a development partner with whom to enter into exclusive negotiations on the PHSB project. Identification of a development partner does not, however, indicate a final decision or commitment to approve or execute a project identical to the selected team's physical proposal. Rather, following developer selection and release of the EA, the Trust will continue to solicit public input and also begin negotiations, using both the EA and the comments received to inform the specifics of the project ultimately selected. The \$1 million annual base rent will in the end have served as a tool and not a limitation.

Notwithstanding public commenters' objections to having stated a financial minimum, the Trust had sufficient basis to conclude that \$1 million was a reasonable minimum value for any development opportunity involving the main hospital itself. The value is based on and consistent with a variety of past and present Presidio-wide and hospital-specific feasibility studies and financial analyses such as the 1998 Financial Management Program, the 2002 PTMP EIS analysis, and other site-specific data and analyses.⁶

When in 2003 the Trust turned its attention to the possibility of leasing in the PHSB district, pre-existing information created financial grounding for the project. Independent market analysis undertaken for and relied upon in the PTMP financial modeling of the planning alternatives determined an average of \$3.60 per square foot for residential ground rent. Several years' experience with residential rental rates at the Presidio showed that on average the Trust could expect lease revenue of about \$3.50 per square foot. Applying these rates to even the smallest development alternative allowed under the PTMP (approximately 275,000 square feet) yields revenue of about \$1 million.

The developers' proposals themselves have borne out the validity of the minimum value. Each of the offer proponents committed to a minimum of \$1 million annual base rent, subject to further negotiation. One of the proponent teams confirmed that its own analysis indicates that the smaller project alternative, although not offered by the developer, is feasible according to the Trust's minimum terms (John Stewart Company et al. 2004). Far from foreclosing the possibility of a "smaller" alternative, the Trust has included the No Infill Alternative (Alternative 3) in the EA, allowing full consideration of any merits and weaknesses, and allowing comparison with the proposed action and other alternatives. Inclusion of the No Infill Alternative also allows its characteristics to inform ongoing lease negotiations and its selection in lieu of the proposed action if warranted.

⁶ See, for example, The Presidio Trust Financial Management Program, Report to Congress (July 8, 1998); 2002 PTMP EIS, Volume III, Appendix J and PTMP Financial Model Assumptions and Documentation Binder (May 2002) at Tab 8; Memorandum dated January 13, 2000 to Presidio Trust Real Estate Committee and Evaluation of Submittals Request for Qualifications Public Health Service Complex (Draft), prepared by Sedway Group (May 28, 1999); February 2003 financial analysis of specified PHSB scenarios prepared by Sedway Group / CBRE Consulting.

Size of the PHS Development and Traffic and Safety Concerns – A number of neighborhood groups, including NAPP, PAR, and the Richmond Presidio Neighbors, and individuals living within the Richmond district and elsewhere stated that the proposed size and scope of the project raises neighborhood traffic and safety concerns, citing parking, congestion, pedestrian safety, and a change in the ambience of the neighborhood. Many felt that 14th and 15th Avenues would not be able to handle the traffic generated, and were apprehensive about potential traffic jams on Lake and California Streets and potential stacking of traffic at the intersections of Lake and California Streets with Park Presidio Boulevard. They suggested that “common sense” dictates that the greater the number of housing units, the greater the number of cars associated with the project. Consequently, they urged the Trust to scale back the size of the development.

Response. In response to these commenters, the Trust has reduced the proposed size (number of housing units) of the largest alternatives by about 10 to 20 percent from the conceptual alternatives the Trust initially proposed at the start of scoping. Alternative 2 has been reduced from 300-390 units to 350 units and Alternative 4 reduced from 300-350 units to 269 units. In addition, the Trust has included the Park Presidio Access Variant to address traffic concerns.

Further, Section 3 of the EA includes a detailed analysis showing objective measures of potential transportation impacts associated with all alternatives, including potential changes in neighborhood traffic and parking. All of the action alternatives would result in fewer daily person trips, fewer daily and peak hour vehicle trips, and less parking demand than the combination of land uses analyzed in the PTMP EIS and included as Alternative 1. Because much of the PHS complex has been vacant for decades, the project, regardless of its size, would likely result in some change to current neighborhood traffic conditions. Without improvements, most of the nearby intersections are expected to operate sluggishly at Level of Service E or F during the morning and evening peak hours due to increases in traffic volumes associated with regional growth trends. Of the action alternatives, Alternative 4 would generate the least number of vehicle trips and therefore result in the least increase in traffic volume and intersection delays related to the project. Alternatives 2 and 3 would add slightly more traffic than Alternative 4, and Alternative 1 would result in the greatest increase in traffic volume and queue lengths at nearby neighborhood intersections.

Planning, NEPA Process, and Public Participation – The Sierra Club, NAPP, PAR, Fort Point and Presidio Historical Association, and others stated that the planning process is flawed because public comment was not sought until options were narrowed to the maximum development proposals. They said that was contrary to the assurances given in the PTMP process that there would be public participation in the development of plans for the individual planning districts.

Response. The Trust is seeking public input through scoping and circulation of this EA, and cannot and will not adopt and implement a proposed action until the environmental review process is complete. No alternatives have been foreclosed, and no decision has been made to pursue “maximum development.” In fact, Table 2 in Section 2, Alternatives, shows that, of the four alternatives being considered, two involve the maximum square footage of 400,000 square feet while two other action alternatives include 275,000

square feet (Alternative 3) and 362,000 square feet (Alternative 4), respectively. In addition, the 400,000-square-foot alternatives have been scaled down to provide fewer units than originally proposed.

Further, the Trust has met its public participation guidelines identified in the PTMP. Pages 130 to 131 of the PTMP state the Trust's commitments to public participation associated with a variety of decisions. For projects involving the potential for major new construction, such as the PSHH project proposal, the Plan calls for public notice, NPS coordination, targeted outreach to interested parties, agency consultation, public scoping, and public review of draft documents such as the draft Planning and Design Guidelines included as Appendix A and this EA. Since announcing the project proposal in April 2003, the Trust has initiated and is pursuing each named step and will continue to meet these requirements.

Providing Alternate Direct Access to the PSHH – The City and County of San Francisco's Department of Parking and Traffic, Richmond neighborhood groups, and numerous residents within the Richmond supported creating a new traffic intersection providing direct access into the Presidio from Highway 1/Park Presidio Boulevard. Some felt the size of the project should not be determined until an analysis of the new traffic access is completed, and others requested that the new intersection be made a condition of the project.

Response. The Trust is exploring the feasibility of a vehicular connection to Park Presidio Boulevard. The new intersection would require installation of a traffic signal, allowing inbound access to the site by cars traveling south on Park Presidio Boulevard, and outbound access from the PSHH district to northbound and southbound Park Presidio Boulevard. Creating this vehicular connection to Park Presidio Boulevard would require support from the City and County of San Francisco and approval and permitting from Caltrans. The new intersection is evaluated as the Park Presidio Access Variant in this EA.

Treatment of the Battery Caulfield Site – The NPS, Golden Gate Audubon Society, NAPP, People for a Golden Gate National Recreation Area, and others suggested that development at Battery Caulfield is inconsistent with the Trust's goals of promoting habitat connectivity and protecting adjacent natural areas, and would result in the disappearance of the California quail from the area. Many recommended that Battery Caulfield be removed from consideration for development, closed as a maintenance yard, and restored to its natural state.

Response. In response to these comments, several alternatives, including the Trust's identified Preferred Alternative (Alternative 2), do not include development at Battery Caulfield; the concept of development on the site continues to be included, however, in Alternative 4. The Trust believes that, although the alternative may not be favored by many members of the public, an alternative that includes development at Battery Caulfield falls within the reasonable range of options left open for consideration in the PTMP. Its inclusion in no way necessitates its selection as the final project, but its thorough analysis will provide valuable information to consider and compare against other alternatives in the PSHH project decision-making process. Issues of habitat connectivity, the quail population, site hydrology, and other natural resources values are addressed in Section 3.

With respect to the final treatment of Battery Caulfield, the present project concerns only rehabilitation and reuse of buildings within the project site. Landscape decisions are part of the project definition only to the extent that they relate to adjacent buildings or their reactivation. For project alternatives that do not involve building at Battery Caulfield, the project proposals assume the status quo land use. Should the Trust ultimately decide to implement the proposed action or another alternative that does not include development at Battery Caulfield, the site would be retained for now in its present use as a maintenance yard. In this event, Battery Caulfield would be available for later planning and development as open space if desired.

Type of Residential Land Use – A number of Richmond neighborhood groups and residents requested that the impacts of different densities of housing and different types of residential use on Presidio open space and the surrounding neighborhoods be evaluated by type of tenant, i.e., senior independent living, senior assisted living, market rate housing, and park-based employee housing.

Response. In response to these comments, Section 3.2, Transportation, includes a discussion of the potential for different housing types and housing populations to result in different impacts.

Incorporating Adequate On-Site Parking – Various neighborhood associations and Richmond district neighbors requested that adequate on-site parking be ensured so that parking does not overflow from the project site into the adjacent neighborhood. They noted that parking presently seems to be at a saturation level in the neighborhood.

Response. In response to these comments, Section 3.2, Transportation, assesses the likely parking demand from each alternative and compares that demand to the proposed supply. The Trust's leasing objective is to create a situation where on-site parking effectively meets on-site demand, but does not exceed the demand to the extent that PHS district residents are encouraged to own and drive an excessive number of vehicles or surrounding neighbors are encouraged to use the Presidio as an overflow parking resource. Achieving this balance requires careful consideration of the supply and location of parking spaces for the project site.

Treatment of the Historic PHS – NAPP, PAR, and others requested that the non-historic wings of Building 1801 be removed because they are unsightly and detract from the historic shape and design of the main structure. They noted that during its decades of operation, the hospital complex occupied the maximum square footage of development for only a relatively brief period of time, from approximately the mid-1950s to the mid-1970s.

Response. In response to these comments, the EA includes two alternatives that would remove the non-historic wings of the PHS (Alternatives 3 and 4), and one alternative that would retain the non-historic wings but remove the one-story loggia or lobby that connects them, revealing the central portion of the historic façade (Alternative 2). In addition, Section 3 of the EA includes a thorough assessment of potential impacts related to historic resources and aesthetic or visual issues. These analyses compare each alternative both to existing site conditions and to the No Action Alternative (Alternative 1), in which the non-historic wings are present.

Providing a Site Interpretation / “No Build” Alternative – California Heritage Council, Fort Point and Presidio Historical Association, and others expressed an interest in participating in the planning for the interpretation of the Nike Missile site, the Marine Hospital Cemetery, and historic buildings located in the PSHH district. These groups also called for inclusion of a “true No Build” alternative.

Response. The Trust welcomes the historic preservation organizations’ interest in and input regarding site interpretation of historic and cultural features within the PSHH district.

Identification of the No Action Alternative (Alternative 1) as one that would implement the adopted management plan for the district with no demolition and no new construction is consistent with NEPA regulations and practice. This issue is further discussed in Section 2. In response to the commenters’ suggestion, the Trust has described “no build” or existing conditions within the descriptions of the Affected Environment in Section 3. With the “no build” baseline described, the reader can understand the difference between the “no build” scenario and the proposed changes under each alternative. A separate “no build” alternative has not also been included because, as described in Section 1, Purpose and Need, maintenance of the PSHH district in its current condition (i.e. a “true No Build” condition) would not conform to Section 110 of the NHPA, which requires federal agencies to take steps to preserve contributing buildings within National Historic Landmarks like the Presidio.

4.2 INTERAGENCY REVIEW

The Trust prepared the PSHH EA concurrently to the fullest extent possible with other applicable environmental reviews or consultation as directed by the Council on Environmental Quality (CEQ) NEPA Regulations (Section 1502.25(a)). To integrate NEPA requirements with other planning and environmental review procedures required by law (or Trust practice), the Trust actively solicited the participation of various agencies, including the National Park Service, the California Department of Transportation, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, the U.S. Environmental Protection Agency, the U.S. Fish and Wildlife Service, and the City and County of San Francisco. Consultations with these agencies are discussed below. Copies of Trust correspondence with several of the agencies are provided in Appendix D.⁷

4.2.1 National Park Service (NPS)

The Presidio Trust Act, as amended, describes the statutory framework for the relationship between the Trust and the NPS. The NPS manages Area A of the Presidio, including Lobos Creek immediately west of the PSHH district. The NPS is also a signatory party to the Programmatic Agreement (PA) for Area B of the Presidio (see Section 4.2.3 below). To facilitate early coordination with the NPS in the Trust’s NEPA process, Trust staff presented the PSHH project at the NPS bi-weekly Project Review Committee Meeting on September 24, 2003. At the meeting, NPS staff had the opportunity to raise project issues and environmental concerns early in the process. The Trust also toured the project site with interested NPS

⁷ Copies of all relevant correspondence are available for review as part of the formal public record.

staff on September 8, 2003 and again on November 7, 2003. Trust and NPS staff with expertise in the biological sciences organized a roundtable discussion with interested groups and outside experts on November 25, 2003 to exchange technical information and opinions and to discuss possible ways to minimize potential impacts of the alternatives on natural resources.

The NPS also submitted scoping comments during EA preparation. In general, the NPS expressed support for the project as it “provides the opportunity to arrest the physical deterioration of the buildings, improve the appearance and vitality of the PHS district and contribute toward both the protection of the [NHLD] and the important natural values at the site while contributing to the generation of revenues for the long-term operation of the Presidio as required by the Trust Act.” The NPS requested that the EA evaluate project impacts on the surrounding neighborhoods and important wildlife communities and natural habitats within the PHS district. The Trust met with the NPS on January 20, 2004 to review their comments and describe how their comments were given consideration in the EA.

4.2.2 California Department of Transportation (Caltrans)

In a letter dated September 16, 2003, Caltrans responded to the Trust’s request for scoping comments and indicated their desire for a Traffic Impact Study (TIS) with specific components for proposed new access directly to Park Presidio Boulevard, a state highway facility. Section 3 of this EA includes information regarding existing traffic conditions in the site vicinity, as well as a thorough analysis of potential transportation impacts of future project alternatives, both with and without the Park Presidio Access Variant. Project alternatives are assessed in the context of cumulative traffic growth. Technical studies cited in the EA are also available to reviewers.

All activities that involve a need to perform work or implement traffic control measures within a state right-of-way require approval from Caltrans. Construction of the Park Presidio Access Variant would qualify as an activity requiring Caltrans approval. On January 5, 2004, representatives of the Trust and the San Francisco Department of Parking and Traffic (DPT) met with Caltrans staff to discuss the Park Presidio Access Variant and to ask for Caltrans support. Caltrans staff stated that they saw “no fatal flaws” with the proposal, and described the agency’s process for considering improvements of this nature.

4.2.3 Advisory Council on Historic Preservation (ACHP) / California State Historic Preservation Officer (SHPO)

Section 106 of the National Historic Preservation Act (NHPA) of 1966 requires the Trust to take into account the effect of its undertakings on historic and cultural resources, including the NHLD. The Trust has entered into a Programmatic Agreement with the ACHP, the SHPO, and the NPS that applies to all undertakings under its jurisdiction. The National Trust for Historic Preservation and the Fort Point and Presidio Historical Association are concurring parties to the PA. The PA provides a framework for reviewing the project effects internally and for consulting with other parties under certain circumstances.

Consistent with the PA and ACHP regulations that suggest early integration of Section 106 compliance with NEPA and other agency processes, in April 2003 the Trust toured the PSHH with ACHP and SHPO representatives and provided copies of the draft Planning and Design Guidelines and other early project information. In September 2003, the Trust requested preliminary comment and early input from the agencies regarding potential alternatives to be evaluated in the EA, the draft Planning and Design Guidelines, or other matters germane to the historic compliance of the undertaking. By the end of the scoping period, neither agency had commented on the project. Concurrent with the issuance of the EA, the Trust in accordance with its PA will submit a “consultation package” to the agencies. It will include public comments received during the public scoping period, the EA, the draft Planning and Design Guidelines (Appendix A), and a request for review and comment pursuant to the PA.

4.2.4 U.S. Environmental Protection Agency (EPA)

The EPA reviewed the PSHH information packet that the Trust distributed at the outset of scoping and recommended that the PSHH project expand wetland features and functions on the upper plateau. One of the PTMP policy goals is to preserve and enhance to the extent feasible the natural and beneficial values of wetlands within the Presidio. Expansion or enhancement of wetland features within the PSHH district are part of ongoing actions and may also be subject to future enhancement projects and proposals. For example, the freshwater wetland north of the PSHH is being restored under the Presidio’s Park Stewardship Program that is funded by the Trust. Other ongoing activities include invasive plant removal, planting, seed collection, and wildlife and plant monitoring. These activities are being implemented separately from the proposed PSHH project.

4.2.5 U.S. Fish and Wildlife Service (USFWS)

Section 7 of the Endangered Species Act requires Federal agencies, in consultation with the USFWS, to ensure that their actions do not jeopardize the continued existence of endangered and threatened species or result in the destruction or adverse modification of the critical habitat of these species. According to the Recovery Plan for Coastal Plants of the Northern San Francisco Peninsula recently published by the USFWS (August 8, 2003), the only federally endangered listed species within the PSHH district is the San Francisco lessingia (*Lessingia germanorum*), occurring in two areas north of the PSHH. On July 23, 2002, following the conclusion of formal consultation, the USFWS issued its Biological Opinion (BO) on the PTMP. The BO determined that the long-term plan for the Presidio described in the PTMP, with the proposed mitigations, would not likely adversely affect the habitat of this species.

In more recent correspondence with the Trust during PSHH project scoping, the USFWS stated that, where existing buildings would be reused, direct impacts on the San Francisco lessingia appear unlikely, as long as construction vehicles are excluded from its habitat. Based on the review of the proposed development plans, mitigations identified in the BO and the PTMP EIS, and further site-specific analysis and mitigations in this EA, project implementation is not expected to cause any loss of or adverse effects on existing habitat. Furthermore, the project would be confined to previously developed or “disturbed” areas of the PSHH district. In addition, the project scope would be constrained in such a way to ensure no

direct or indirect adverse effects on the San Francisco lessingia during construction or operation. The Trust will continue to implement the appropriate recovery measures in the recovery plan and protection measures in the BO. The project site for PHSB buildings has been defined to exclude San Francisco lessingia locations and habitat. The “Hospital Buffer” reinforces the separation, as does restoring coastal dune grassland or scrub vegetation suitable for the expansion of San Francisco lessingia populations north of the buffer zone. The Trust will continue to coordinate with and provide additional information to the USFWS during project planning and implementation, and will reinitiate formal consultation if required.

4.2.6 City and County of San Francisco (CCSF)

The Trust staff met with CCSF Department of Parking and Traffic staff on December 18, 2003. DPT has agreed to work cooperatively with Caltrans and Richmond District neighbors in planning for the potential new access to the project site off Park Presidio Boulevard. DPT has urged the Trust to consider not only the engineering feasibility of this access, but also the issues of cost, Caltrans approval, schedule, and the source of funds for the improvement. Trust staff also consulted with the CCSF’s Department of the Environment regarding solid waste generation within the PHSB district.

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