



This section summarizes the Presidio Trust’s public involvement efforts, including the preferred alternative selection process, consultation with public agencies, and compliance with relevant environmental review laws and executive orders. Lists of preparers and recipients are also provided.

5.1 History of Public Involvement

After assuming the planning process for the Letterman Complex from NPS, the Trust, in keeping with its Public Outreach Policy, designed a thorough public involvement process for the development to fully satisfy the public participation requirements of NEPA.

5.1.1 THE TRUST’S PUBLIC OUTREACH POLICY

Since it first formed in 1997 and started operations with only a handful of employees, the Trust has endeavored to build regular opportunities for public input into its daily operations. Early in its organizational life, in response to Section 103(c)(6) of the Trust Act, which requires the Trust Board to establish “procedures for providing public information and opportunities for public comment regarding policy, planning, and design issues,” the Trust Board established the Trust’s Public Outreach Policy. That policy, adopted at the first meeting of the Board on July 7, 1997 (Board Resolution No. 97-3) and later expanded on March 17, 1998 under Board Resolution 98-16, encourages members of the general public to make their views known to the Trust. The Trust encourages public comment to be made directly in writing, by phone, or at a variety of public meetings. In addition, the Trust is authorized under Section 10(c)(6) of the Trust Act to provide opportunities for public comment through the Golden Gate National Recreation Area Citizens Advisory Commission, which it has done repeatedly throughout the project.

Community outreach related to the proposed project has included opportunities for public input at every step of the process. The Trust has actively sought public input on the Financial Management Program that served to determine the bounds of the proposed, on the Request for Qualifications (RFQ) and Request for Proposals (RFP) seeking prospective users/tenants for the 23-acre site, and on the development of the Planning Guidelines to ensure new construction at the site conforms with the National Historic Landmark status. All of this input has been in addition to meeting the public participation requirements of NEPA, including consideration of public comment on the Draft EIS and consultation with other federal and state agencies.

5.1.2 COMMUNITY OUTREACH ON THE FINANCIAL MANAGEMENT PROGRAM

The FMP, finalized in July 1998, sets forth the financial forecasts for the proposed project (see Section 1.2.2). To provide the public with opportunities to learn about and comment on the FMP, the Trust held a series of public meetings beginning with initial presentation of the draft program at a joint meeting of the Presidio Trust Board of Directors and the GGNRA Citizens Advisory Commission on April 27, 1998. This meeting received local and national media coverage. The Trust conducted additional meetings on May 27, June 2, and June 8, 1998. In addition to hosting the public workshops, the Presidio Trust staff presented the FMP to more than twenty neighborhood, community, civic, and business groups — an aggregate of approximately 1,000 interested citizens. The presentations noted that development and uses at the Letterman Complex, including demolition of the existing medical center and research institute and construction of new buildings, as a key contributor to



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achievement of financial self-sufficiency. On June 10, 1998 the GGNRA Advisory Commission voted unanimously to approve a resolution supporting the FMP.

5.1.3 COMMUNITY OUTREACH DURING RFQ/RFP PROCESS

The Trust held a series of public workshops related to the Letterman Complex RFQ/RFP and tenant selection. In order to facilitate public input regarding the range of potential uses currently being considered for the 23-acre site, the Trust held a series of public meetings during the RFQ response period (August 14, 1998 through October 12, 1998), beginning with workshops on August 25, 1998 and September 3, 1998. A front-page article describing the RFQ process for the 23 acres was also featured in the September 1998 issue of the *Presidio Post*, the monthly publication of the Presidio Trust. In addition, on September 2, 1998, the Trust held a pre-submittal conference for prospective RFQ respondents to learn more about the lease opportunity. On October 14, 1998, the Trust gave a report on the RFQ and related public outreach to the GGNRA Advisory Commission.

To provide the public with opportunities to comment on the proposals received prior to the March 1, 1999 deadline responding to the Letterman Complex RFP, the Trust hosted three workshops. At two meetings on March 24, 1999 (in the morning with the Trust Board of Directors, and in the evening with Trust staff), and again on April 6, 1999, the four respondent teams presented their proposals and the public was offered an opportunity to comment. Videotapes of the teams' presentations, as well as their written proposals, have been available for public review in the Trust library, and the news media gave extensive coverage to the four team presentations.

In addition to these workshops, the Trust arranged and participated in numerous informal public sessions to provide information and gather comments. The Trust arranged an informal open house on March 30, 1999 for the Presidio community to meet the four teams. In addition, during March through May 1999, Trust staff and representatives of respondent teams were present to discuss and answer questions about the proposals at public meetings of the Cow Hollow Neighbors in Action; Cow Hollow Association of Neighbors; Neighborhood Associations for Presidio Planning (NAPP); Presidio Alliance; and San Francisco Planning and Urban Research. The Trust gave regular updates to the public in the *Presidio Post* and at meetings of the GGRNA Advisory Commission and Presidio Committee, Presidio Tenants' Council, Presidio Residential Mayors, NAPP, People for the Presidio, and various civic and business groups.

The Trust estimates that 1,500 people have participated in and offered comment during these public meetings sponsored by the Trust, and the Trust has received and considered more than 300 letters regarding the reuse of the 23-acre site within the Letterman Complex.

5.1.4 COMMUNITY OUTREACH PRIOR TO EIS PUBLICATION

Concurrent with public outreach as part of the leasing process has been the Trust's public outreach in connection with the EIS itself and the NEPA process. The Presidio Trust published notice of its intent to prepare the Draft EIS in the Federal Register on December 24, 1998. The Trust held a public meeting on January 27, 1999 to elicit comment regarding the alternatives and the environmental issues requiring further analysis in the Draft EIS. At the meeting, written comments were also encouraged. The Trust provided feedback to the commentators as to the matters raised at the meeting and in letters in a front-page article of the March 1999 issue of the *Presidio Post* and through a direct mailing, which also announced the upcoming



release of the Draft EIS for public comment. The following is a summary of the comments made during the public workshop:

Project Scope – There was strong consensus that the impacts of new development on the 23-acre site should be considered in the context of both the 60-acre Letterman Complex and the Presidio as a whole.

Potential Uses and Programs – The project should be in keeping with the character of the Presidio as a national park. New uses should support themes identified in the 1994 General Management Plan Amendment to the extent possible, including reuse of a portion of the buildings. Concern was raised about nighttime activities and programs and their potential effects.

Views, Open Space and Access – Open space in the project should be accessible to the public and to neighbors. Green space, vegetation buffers and views should be maintained. Important views should be protected.

Design Compatibility – Concerns were expressed about the size, scale, and density of buildings on the 23-acre site. New construction must be compatible with both the adjacent historic hospital complex and adjacent neighborhoods. The park-like character should be retained.

Transportation, Traffic and Circulation – Neighbors expressed concern about traffic and parking impacts during construction and building occupancy. Convenient pedestrian access within and to the surrounding areas should be created.

Parking – There was consistent agreement about reducing surface parking and preventing parking from spilling into adjoining neighborhoods. Sufficient parking, including underground parking, is desirable but should not be so abundant as to impede programs to reduce automobile use.

Water – Concern was expressed about the adequacy of the Presidio water supply to provide water to the new facilities. Water conservation measures were recommended.

Housing – Many participants wanted to know more about rental rates of any proposed housing that would be incorporated into the 23-acre site. Affordability for entry level employees was favored by many. It was agreed that providing onsite housing would reduce employee commuting.

Community Services – Some participants felt retail operations would compete with existing businesses. Others felt this would support Presidio residents and be a convenience for surrounding neighbors.

Sustainability – Arguments were made that any new buildings on the site should be designed to adapt to future change of uses over time. Achieving environmentally sustainable goals on the 23-acre site was important.

5.1.5 PUBLIC COMMENT PERIOD FOR THE DRAFT EIS

The Presidio Trust released the Draft EIS for public review and comment on April 19, 1999. Notice of the availability of the Draft EIS was provided in the Federal Register and local news media, and through direct mailing, flyers to owners and occupants of nearby property, posting on the Presidio Trust's website (www.presidiotrust.gov) and an update in the Trust's monthly *Presidio Post* publication. The dates of public hearings were included within the notice of availability and within each copy of the Draft EIS. Approximately



325 copies of the Draft EIS were distributed to public interest groups and individuals. The Draft EIS was also made available for review on the Presidio Trust's website and at the Presidio Trust library, park headquarters and local libraries, and a local photocopy shop. Additional documents were also released to accompany the Draft EIS, including the GMPA and GMPA EIS (NPS 1994a) and the *Letterman Complex Transportation Technical Report* (Wilbur Smith Associates 1999).

The Presidio Trust announced the release and presented the Draft EIS at a formal GGNRA Citizens Advisory Commission meeting on April 20, 1999 and again the following evening in a Presidio Trust public workshop. At both these meetings, the public was encouraged to submit written or oral comments on the Draft EIS through upcoming public meetings. A summary highlighting the major conclusions of the Draft EIS was widely distributed and posted on the Presidio Trust's website. Three formal GGNRA Citizens Advisory Commission meetings were held, on May 18, 1999, June 15, 1999 and July 20, 1999, where public comments on the Draft EIS were received and officially transcribed. In addition, the Presidio Trust held a number of informal meetings with various government agencies and organized interest groups to provide an opportunity to ask questions. The public comment period established by the U.S. Environmental Protection Agency for the Draft EIS commenced on April 23, 1999 and was originally intended to expire on June 26, 1999. On June 18, 1999, as noticed in the Federal Register (64 Fed. Reg. 32899-32900) and through direct mailing to 735 individuals and organizations, the Presidio Trust identified the Digital Arts Center as its preferred alternative and elected to extend the public comment period and accept written comments through August 2, 1999.

By the close of the public comment period, the Presidio Trust received a total of 52 written comment letters on the Draft EIS, including an electronic form letter separately submitted by 100 individuals. The GGNRA Citizens Advisory Committee, on behalf of the Presidio Trust, also heard 40 oral testimonies by 35 individuals, 16 of whom also submitted written comment letters. In addition, 11 comment letters were submitted after the expiration of the public comment period. While the Presidio Trust is not obligated to respond to these letters, in the interest of facilitating full agency and public involvement, the Presidio Trust chose to evaluate the substance of these letters and respond as appropriate. All letters received prior to and after the close of the comment period and summary minutes from the three formal meetings are reprinted in the Responses to Comments document of the Final EIS.

The letters received by the Presidio Trust contain a variety of comments on the Draft EIS. The comments included concerns on such issues as the NEPA process; consistency with the GMPA; compliance with the Planning Guidelines; demonstration of the financial need for the project; impacts on future decision-making, the larger 60-acre complex and other areas of the park; effects on the visitor experience and public use of the Presidio; the appropriate scale of development; and impacts on the adjacent neighborhood, including parking and traffic.

The Presidio Trust responded to all substantive public comments according to the requirements of 40 CFR 1503. Some comments called for clarification of information in the Draft EIS and Draft Planning Guidelines. Other comments required text modifications, which have been made in the Final EIS and Final Planning Guidelines and identified in the Presidio Trust's responses. No responses are provided to comments that merely expressed opinions and did not identify a question or a needed text clarification, correction, or modification. Although responses are not required on comments that simply expressed support for the Presidio Trust's



preferred alternative or for one of the other alternatives, all comments have been taken into account in preparing the Final EIS, and will be considered by the Trust in reaching its final decision.

5.1.6 PUBLIC INVOLVEMENT IN DESIGN REVIEW

In addition to the environmental analysis required as part of the NEPA process, of central importance to ensuring that new construction at the 23-acre site conforms with the National Historic Landmark status is the Trust's compliance with the National Historic Preservation Act (NHPA). To satisfy the NHPA, the Trust will develop Design Guidelines for new construction in consultation with the State Historic Preservation Office (SHPO) and Advisory Council on Historic Preservation (ACHP). Although not required under NEPA, early in the planning process for the Letterman Complex, the Trust integrated opportunities for public input on development of the Planning Guidelines into the NEPA decision-making process. Preparation of the Planning Guidelines began in January 1999, with assistance from NPS technical staff. The Trust presented a draft outline for the Planning Guidelines at a January 27, 1999 public scoping workshop. When the Trust published the Draft EIS, it included the Draft Planning Guidelines (Appendix B), and received additional public comment through that review process.

An initial draft of the Design Guidelines, as a follow-on to the Planning Guidelines, that address architectural and landscape issues for new construction, were then posted on the Presidio Trust's web-site and made available to the public on December 6, 1999. The Trust held a public workshop on the preliminary Design Guidelines on December 13, 1999 and received public comment on them until December 27, 1999.

The Final Planning Guidelines are included in the Final EIS in Appendix B. The Design Guidelines for new construction, which are still under development and must be submitted to the SHPO for review and comment as part of the NHPA's Section 106 consultation process, will incorporate the Final Planning Guidelines that have been publicly reviewed and finalized under this EIS.¹

5.2 *The Preferred Alternative Selection Process*

An aspect of the Trust's process with respect to the Letterman Complex EIS that caused a great deal of public confusion was the preferred alternative selection process. It was commonly perceived that the Trust had made a final selection before the public comment period had closed on the Draft EIS and well before the NEPA process had been completed. That, however, is not so. In an attempt to keep the public fully informed during the highly charged and heavily scrutinized RFQ/RFP process for the Letterman Complex, the Trust communicated certain information that may have been initially misleading and the problem was then compounded by inaccurate media coverage.

In keeping with the Trust's Public Outreach Policy, as early as August 1998, the Trust instituted a practice of issuing press releases and monthly newsletter articles as a means to keep the public fully informed on the status of the project. On August 14, 1998, the Trust issued its first press release for the Letterman Complex announcing the publication of the RFQ and the opportunity to lease almost one-third of the Presidio's non-

¹ See Section 1.4 for more complete discussion of the relationship of Planning and Design Guidelines to the proposed project.



residential building space. In a series of nine press releases, the Trust periodically updated the status of the project.

After the Trust announced on January 5, 1999 the shortlist of four development teams who had been invited to present more detailed proposals for the 23-acre site, the atmosphere of competition among the development teams grew increasingly intense. An aspect of the competitive atmosphere was an aggressive and expensive public relations campaign by each development team designed to persuade the public to favor one team over another. Pressure on the Trust grew to chronicle and publicize any and every increment of progress toward selection of a preferred alternative in order to quell the public relations spending.

Toward this end, a potentially confusing press release on May 3, 1999 announced that the Trust had “preliminarily narrowed its focus to two finalists . . .” While it went on to state that the Trust would continue its comprehensive review of all development team submittals and could still look to the other remaining teams, the release did not clearly state that the announcement was part of the Trust’s process for identifying a preferred alternative under NEPA.² A second press release on May 26, 1999 corrected the first, stating that the Trust Board of Directors was continuing its deliberations about the preferred alternative for the 23-acre site. Nevertheless, after a number of printed reports incorrectly characterized the identification of the preferred alternative as a final decision, the Trust issued another press release on June 14, 1999. Although this release confirmed that all alternatives analyzed in the Draft EIS for the Letterman Complex remained viable, it too created further confusion by announcing the start of preliminary negotiations with the proponent of the preferred alternative. Although the Trust attempted to but could not control the oversimplification of the process by the press, because of the confusion generated, the Trust, after consultation with the U.S. EPA, elected to extend the public comment period on the Draft EIS for an additional 45 days.

In extending the public comment period, the Trust made clear that in identifying Lucasfilm’s Letterman Digital Arts Ltd. (LDA) as the proponent of the preferred alternative under the EIS with whom the Trust would begin exclusive negotiations, no final decisions or binding commitments were being made. The Trust was not precluding the selection of any of the other alternatives, merely indicating the one that in the Trust’s judgment would best fulfill its statutory mission and responsibilities subject to the completion of the NEPA process. No final commitments will be made until after the Record of Decision under this EIS is complete. Exploratory negotiations have begun with the proponent only to test the willingness to adhere to the maximum extent to the Planning Guidelines and to the project’s purpose and need. Despite these early discussions, no actions have been taken or commitments made that prevent the Trust from ultimately using one of the alternative scenarios or which otherwise irreversibly commits the Trust to accept LDA’s proposal. If there were any problems with proceeding with LDA’s proposal, whether environmental concerns or unrelated logistical disagreements, the Trust would be free to begin discussions with other development teams pursuant to this same EIS. Accordingly, contrary to any perception otherwise, the Trust has made no final decision before having completed the NEPA process for the Letterman Complex project being studied in this EIS.

² A “preferred alternative” is “the alternative which the agency believes would fulfill its statutory mission and responsibilities, giving consideration to economic, environmental, technical, and other factors” (Forty Questions No. 4a: CEQ 1981). CEQ’s NEPA regulations provide that an agency shall “identify the agency’s preferred alternative or alternatives, if one or more exists, in the draft statement and identify such alternative in the final statement.” 40 C.F.R. 1502.14(e).



5.3 Public Agency Consultation

Prior to preparation of the Draft EIS, through direct mailing and follow-up presentations, the Presidio Trust solicited the input of public agencies and Indian tribes listed in Section 5.6 as to their views on any environmental impact in connection with the project (Presidio Trust 1998c). Of the 37 agencies and eight Indian Tribes invited to comment, nine agencies responded. The following is a summary of the comments received during the early consultation.

5.3.1 DEPARTMENT OF THE ARMY,
HEADQUARTERS, I CORPS AND FORT LEWIS,
BASE REALIGNMENT AND CLOSURE (BRAC) ENVIRONMENTAL OFFICE

The agency maintains that it has no statutory responsibilities in connection with the project because base closure-related remedial activities were completed in the LAMC/LAIR footprint several years ago, and no other U.S. Army environmental actions are required (U.S. Army 1999).

5.3.2 DEPARTMENT OF THE ARMY,
SAN FRANCISCO DISTRICT, CORPS OF ENGINEERS

The agency determined that the project would not involve any areas within Corps jurisdiction and would not require a permit from the Corps (U.S. Army Corps of Engineers 1999).

5.3.3 DEPARTMENT OF THE INTERIOR,
NATIONAL PARK SERVICE,
GOLDEN GATE NATIONAL RECREATION AREA

The NPS urged the Presidio Trust to work cooperatively with its staff and the community to develop an appropriate strategy for adapting the GMPA to changing circumstances while maintaining its vision. The agency also requested that the Draft EIS include additional information within the following impact topics: consistency with approved plans and policies; geology and earthquakes; water quality/storm drainage/wetlands; city services (water supply and distribution, wastewater treatment, law enforcement services, fire protection and emergency medical services); housing; traffic and transportation systems; land use in the Presidio community and surrounding neighborhoods; National Historic Landmark district; special status species; noise; and recreation. Each of these issues was addressed in the Draft EIS, either by in-depth analysis or through further examination of the concerns in Appendix A. Pursuant to interagency agreement, the NPS is considered a cooperating agency for the purposes of this NEPA analysis (NPS 1999i).

5.3.4 U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION IX OFFICE

The agency had no formal comments but reviewed preliminary sections of the Draft EIS and suggested additional alternatives to be considered in the Draft EIS. The agency also recommended that the Presidio Trust give formal notice of the preferred alternative and extend the public comment period upon making its selection following release of the Draft EIS, which was done.

5.3.5 CALIFORNIA DEPARTMENT OF HEALTH SERVICES

The agency requested that the Draft EIS include information regarding the disposition of radioactive materials at the medical center and research institute (California Department of Health Services 1999). In 1993, the Nuclear Regulatory Commission completed confirmatory radiological surveys of the LAMC and LAIR as part of its termination process. Licenses for radioactive materials were held for buildings 1006, 1007, 1010, 1011, 1012, 1013, 1014, 1057, 1059, 1100 and 1110. These surveys documented contamination issues, confirmed that



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such contamination had been remedied to Nuclear Regulatory Commission standards, and determined that the surveyed facilities are suitable for unrestricted use (U.S. Army 1993a, Berger 1993, Vitkus 1993). This information has been included in Section Y, Human Health, Safety and the Environment in Appendix A of the EIS.

5.3.6 CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL

The agency requested that the potential for a hazardous substance or hazardous waste release should be discussed in the Draft EIS (California Department of Toxic Substances Control 1999). Any evidence of hazardous substance or hazardous waste releases identified during demolition and construction activities would be properly addressed pursuant to applicable statutes. Measures that would be taken to address any hazardous substances encountered during demolition and construction activities are described in Section 4.0.

5.3.7 CALIFORNIA DEPARTMENT OF WATER RESOURCES

The agency expressed no concerns related to the proposed project because it would not include development within a floodplain or impact bay water quality (California Department of Water Resources 1999).

5.3.8 CITY AND COUNTY OF SAN FRANCISCO DEPARTMENT OF PARKING AND TRAFFIC

The agency reviewed plans for the modified configuration at the intersection of Lyon Street, Richardson Avenue and Gorgas Avenue and generally concurred with the plans. The agency suggested a level of service analysis to determine the impact of the schemes on through traffic and recommended coordination with the Palace of Fine Arts/Exploratorium (City and County of San Francisco, Department of Parking and Traffic 1999e).

5.3.9 CITY AND COUNTY OF SAN FRANCISCO DEPARTMENT OF PUBLIC WORKS

The agency requested that the Draft EIS include information on the abatement of hazardous materials and contingency plans for activities in the Presidio (City and County of San Francisco, Department of Public Works 1999c).

5.4 Compliance with Relevant Environmental Review Laws and Executive Orders

5.4.1 CLEAN WATER ACT

The Clean Water Act is a 1977 amendment to the Federal Water Pollution Control Act of 1972, which set the basic structure for controlling pollutants in storm-water runoff discharges. The Clean Water Act requires that a National Pollutant Discharge Elimination System permit be obtained for construction projects that disturb an area greater than 5 acres. The permit requires development, implementation and compliance monitoring of a storm water pollution prevention plan that prescribes best management practices to control erosion and runoff during construction. The selected development team for the 23-acre site would comply with these provisions prior to commencement of construction activities.



5.4.2 CLEAN AIR ACT

The federal Clean Air Act requires a conformity determination for proposed federal actions within locations that are designated as nonattainment or maintenance areas. The San Francisco Bay Area is designated as a moderate nonattainment area for ozone and a maintenance area for carbon monoxide. General federal actions that cause direct and indirect emissions beyond the emission thresholds set forth in 40 CFR 51.853 are required to complete a conformity determination. The pollutants of concern are ozone (and its precursors, i.e., volatile organic compounds and oxides of nitrogen) and CO. Particulates are not of concern because the Bay Area is in attainment of the federal particulate standards.

As discussed in Section 3.11.2, a federal conformity analysis evaluates whether a proposed action conforms to the State Implementation Plan for a particular pollutant.³ A conformity analysis is not necessary at this time for three reasons. First, the proposed alternatives for the Letterman Complex fall within the development envelope already approved as part of the 1994 GMPA. No alternative now under consideration would result in the exceedance of the 1.3 million allowable square footage for the complex. Furthermore, the estimated vehicle trips from the six alternatives now under consideration are less than the maximum trips under the proposed action (Alternative A) considered in the 1994 GMPA EIS (Wilbur Smith Associates 1999). Therefore, the 1994 GMPA EIS already considered a greater amount of emissions than any of the currently proposed alternatives.

Second, the current maintenance plan for CO includes population and employment estimates for a populated Presidio. The current maintenance plan for CO in the Bay Area Air Basin is embodied in the *Proposed Carbon Monoxide Redesignation Request and Maintenance Plan for Ten Federal Planning Areas* (CO Maintenance Plan) (California Air Resources Board 1996). Although ABAG's Projections '96 may have assumed that the Army had vacated and no substantial uses would replace the Army (personal communication with Hing Wong, Regional Planner, ABAG), the projections used as a basis for the CO Maintenance Plan were based upon earlier ABAG projections, either from 1994 or 1992. These earlier projections included the U.S. Army's use of the Presidio, and consequently, had higher employment figures.

The proposed alternatives for the 23-acre site would cause emissions of ozone precursors that fall below the thresholds set forth in the federal regulations. No conformity determination is required for projects emitting less than these amounts. This means that proposed development under any of the alternatives currently under consideration is included within the relevant plans prepared to meet or maintain federal air quality standards, and the alternative selected by the Presidio Trust would be in conformance. No further conformity analysis is necessary.

In the jurisdiction of the BAAQMD, construction emissions are included in the emissions inventory that is the basis for regional air quality plans and are not expected to impede attainment of air quality standards.

³ The thresholds from the federal regulations are as follows. Regarding carbon monoxide, the Bay Area is designated as a maintenance area; therefore, the threshold is 100 tons/year (or 548 lb/day) (40 CFR §51.853(b)(2)). Regarding ozone, the U.S. EPA Region IX Administrator changed the Bay Area's classification for the federal one-hour ozone standard from a "maintenance area" to an "unclassified nonattainment area," effective August 10, 1998. The threshold is 100 tons per year (or 548 lb/day) for ozone precursors for an "unclassified nonattainment area" (40 CFR §51.853(b)(1)). As shown in Table 22, the emissions of ozone precursors fall below the 100 tons per day threshold. Therefore, no conformity determination is required regarding ozone precursors.



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5.4.3 NATIONAL HISTORIC PRESERVATION ACT

Under Section 106 of the National Historic Preservation Act, federal agencies are required “to take into account the effect” of a project such as new development and uses on the 23 acres within the Letterman Complex and to provide the Advisory Council on Historic Preservation (ACHP) a “reasonable opportunity to comment with regard to” such a project. The Council has issued regulations appearing at 36 CFR Part 800 that detail how an agency such as the Presidio Trust may comply with the mandate of Section 106. Pursuant to these regulations, the Presidio Trust has been engaged in extensive consultation with the California State Historic Preservation Office and the ACHP regarding Section 106 compliance at the entire 60-acre Letterman Complex. The Presidio Trust has also received input and comment from a variety of other organizations. The result of this process has been the production of a Programmatic Agreement (as provided in Appendix F) under Section 800.14 of the ACHP’s regulations. Implementation of the Programmatic Agreement will satisfy the Presidio Trust’s Section 106 obligations (see Section 1.4 for a more complete discussion of the Trust’s NHPA compliance activities).

5.4.4 ENDANGERED SPECIES ACT

Section 7 of the Endangered Species Act directs all federal agencies to further the purposes of the act. Federal agencies are required to consult with the U.S. Fish and Wildlife Service (USFWS) to ensure that any action authorized, funded or carried out by the agency does not jeopardize the continued existence of listed species or critical habitat. Because none of the alternatives would adversely affect any federally listed or candidate species or critical habitat, no formal consultation with USFWS is required.

5.4.5 EXECUTIVE ORDER 11988 (FLOODPLAIN MANAGEMENT), EXECUTIVE ORDER 11900 (PROTECTION OF WETLANDS) AND THE FISH AND WILDLIFE COORDINATION ACT (FWCA)

Executive Orders 11988 and 11990 direct federal agencies to enhance floodplain and wetland values, to avoid development in floodplains and wetlands whenever there is a practical alternative, and to avoid to the extent possible adverse impacts associated with the occupancy or modification of floodplains and wetlands. Development within the Letterman Complex would be compatible with these executive orders. The Fish and Wildlife Coordination Act provides the basic authority for USFWS review of water resources development projects. No “waters or channel of a body of water” would be modified during development within the Letterman Complex.

5.4.6 ENVIRONMENTAL JUSTICE: EXECUTIVE ORDER 12898

Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” provides that “each federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.” In the memorandum to heads of departments that accompanied this Executive Order, the President emphasized the importance of NEPA’s public participation process in achieving environmental justice goals.

Based on the 1990 Census, the distribution of population within the city of San Francisco was as follows: 47 percent White, 29 percent Asian, 13 percent Hispanic, 11 percent Black and 1 percent Other (Table 25). The median household income in San Francisco was \$40,561 in 1989 based on the 1990 Census. The population distribution within the census tracts that surround the Presidio ranges from nearly 90 percent white to just under 49 percent white. Median household incomes in these tracts range from a high of over \$200,000 to a low of



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\$32,344. Given this information, the neighborhoods that surround the Presidio cannot be characterized as predominantly minority or low-income.

None of the alternatives would create any adverse impacts on minority or low-income communities. Rather, the action alternatives would expand recreational and educational opportunities for these communities, as well as for the general population.



Table 25
Demographics of Neighborhoods Surrounding the Presidio (1990 Census)

CENSUS TRACT	TOTAL POPULATION	PERCENT WHITE	PERCENT BLACK	PERCENT AMERICAN INDIAN/ESKIMO/ALEUT	PERCENT ASIAN/PACIFIC ISLANDER	PERCENT HISPANIC	PERCENT OTHER	1989 MEDIAN HOUSEHOLD INCOME
City of San Francisco	723,959	46.81	10.63	0.36	28.66	13.35	0.19	\$40,561
06075012600	4,284	87.89	0.68	0.16	7.28	3.94	0.05	\$40,018
06075012700	2,617	87.31	0.42	0.27	8.06	3.90	0.04	\$38,290
06075012800	4,117	87.03	0.92	0.12	8.40	3.45	0.07	\$50,568
06075013200	4,320	88.29	0.67	0.07	7.31	3.47	0.19	\$65,738
06075013300	4,048	83.57	2.62	0.22	9.46	3.95	0.17	\$58,039
06075013400	3,633	82.30	5.75	0.17	7.38	4.29	0.11	\$48,774
06075015300	2,009	62.02	22.45	0.25	10.70	4.58	0.00	\$42,100
06075015400	5,453	62.00	9.06	0.28	23.69	4.84	0.13	\$34,255
06075040100	4,334	52.33	2.15	0.21	39.87	5.33	0.12	\$32,344
06075040200	5,340	51.80	1.25	0.24	42.98	3.52	0.21	\$37,303
06075042600	6,943	50.64	1.57	0.23	42.45	5.00	0.12	\$36,250
06075042700	5,262	48.75	2.07	0.40	43.29	5.28	0.21	\$33,110
06075042800	2,457	78.47	0.57	0.16	17.30	3.30	0.20	\$82,292
06075060200	11	54.55	0.00	0.00	45.45	0.00	0.00	\$200,000

Source: BAE

5.5 List of Preparers

5.5.1 PREPARERS

John Pelka, NEPA Compliance Coordinator, Presidio Trust, B.A., City and Regional Planning; M.C.P., Environmental Planning

Karen Alschuler, AICP, Principal, Simon, Martin-Vegue, Winkelstein and Moris (SMWM), B.A., American Studies; M.C.P., City Planning

Cheryl Barton, FASLA, Principal, Office of Cheryl Barton, B.A., Fine Arts/Art History; M.L.A., Landscape Architecture

Brewster Birdsall, Senior Environmental Engineer, EIP Associates, B.S.M.E., Mechanical Engineering; M.S.C.E., Civil Engineering

Eric Blind, Archeological Technician, Presidio Trust, B.A., Sociology/Anthropology

Matt Kowta, Principal, Bay Area Economics, B.A., Geography; M.C.P., City and Regional Planning

Rebecca Lave, Planner, SMWM, B.A., Art History/Political Science; M.C.P., City Planning

Chandler McCoy, Planner, Presidio Trust, B.S., Architecture; M., Architecture

John Miller, Associate, Bay Area Economics, B.A., Economics

Amy Marshall, Transportation Planner, Wilbur Smith Associates, B.S., Civil Engineering; M.S., Transportation Engineering

Sowmya Parthasarathy, AICP, Planner, SMWM, B.A., Architecture; M., Urban Design

Richard Tilles, Transportation Manager, Presidio Trust, B.C.E., Civil Engineering; M.S., Urban Planning

Cherilyn Widell, Compliance Manager, Presidio Trust, B.A., American History

Luba Wyznyckyj, Principal Transportation Planner, Wilbur Smith Associates, B.A., Economics, Urban Planning; M.U.P., Infrastructure

5.5.2 CONTRIBUTORS

Jane Blackstone, Deputy Director, Real Estate and Planning, Presidio Trust

Carey Feierabend, Planning Manager, Real Estate and Planning, Presidio Trust

Beatrice Ammann, Planning Technician, Presidio Trust

William F. Dietrich, Senior Project Manager, EIP Associates

Kathleen Diohep, Financial Analyst, Presidio Trust

Joanne Marchetta, Assistant General Counsel, Presidio Trust

Michael Painter, Landscape Architect, MPA Design

Maurice Palumbo, Principal Planner, Golden Gate Bridge Highway and Transportation District

Sharron Reackhof, Environmental Remediation Manager, Presidio Trust

Anita Roberts, Leasing Assistant, Presidio Trust

Barbara W. Sahn, Senior Associate, EIP Associates

David Shiver, Principal, Bay Area Economics



5 . CONSULTATION AND COORDINATION

Aimee Vincent, Sustainability Coordinator,
Presidio Trust

5.5.3 PERSONS CONSULTED

Darice Bailey, Senior Health Physicist, California
Department of Health Services

Leo Barker, Archeologist, NPS, GGNRA

Kristin Baron, Architectural Historian, NPS,
GGNRA

Ric Borjes, Chief, Branch of Cultural Resources,
NPS, GGNRA

Michael Foster, Captain, United States Park Police
Field Office, Administrative Section, NPS,
GGNRA

Alice Glasner, Planner, Major Environmental
Analysis Section, Department of City Planning,
City and County of San Francisco

Beth Goldstein, Hydraulic Planning Group

Susan Hall, Landscape Architect, formerly with
NPS, GGNRA

Steve Haller, Historian, NPS, GGNRA

Daphne A. Hatch, Wildlife Specialist, NPS,
GGNRA

John Knudsen, Regulatory Branch, Department of
the Army, Corps of Engineers, San Francisco
District

David Lindsey, Planner and Team Leader,
Northwest Quadrant, San Francisco Planning
Department

Paul Lineberry, Landfill Engineer, Zanker Road
Landfill

Bill Oswald, Fire Chief, Presidio Fire Department

Maurice Palumbo, Principal Planner, Golden Gate
Bridge, Highway and Transportation District

Leonidas Payne, NEPA Coordinator,
Environmental Protection Agency, Region IX
Office

Wendy Poinot, Environmental Protection
Specialist, NPS, GGNRA

Michelle Rios, Architect, NPS, GGNRA

Jerry Robbins, Transportation Planner, City and
County of San Francisco, Department of Parking
and Traffic

Christy Rocca, Director of Programs, Crissy Field
Center, Golden Gate National Parks Association

Brian Ullensvang, Remediation Specialist, NPS,
GGNRA

Nick Weeks, Landscape Architect, NPS, GGNRA

Margaret Wells, Program Director, Education
Placement Center, SFUSD

Diane Wong, Planner, Major Environmental
Analysis Section, Department of City Planning,
City and County of San Francisco

Hing Wong, Regional Planner, Association of Bay
Area Governments (ABAG)

Paul Yamamoto, Alameda County Division
Manager, Waste Management, Inc.



5.6 List of Recipients

The list of agencies and organizations to whom copies of the Draft EIS and Final EIS were sent is provided below. The complete list of recipients (including individuals) who were provided notice of the documents' availability can be reviewed at The Presidio Trust, 34 Graham Street, P.O. Box 29052, San Francisco, CA 94129-0052.

5.6.1 FEDERAL AGENCIES

<p>Department of the Army Corps of Engineers, San Francisco District Headquarters, I Corps and Fort Lewis, BRAC Environmental Office</p> <p>Department of Commerce National Oceanic and Atmospheric Administration, National Marine Fisheries Service</p> <p>Department of Energy San Francisco Support Office</p> <p>Department of the Interior Bureau of Indian Affairs Fish and Wildlife Service, Sacramento Fish and Wildlife Office</p>	<p>National Park Service, 1) Superintendent, Golden Gate National Recreation Area; 2) Presidio General Manager; 3) Regional Director, Pacific West Region</p> <p>Office of Environmental Policy & Compliance</p> <p>Department of Transportation Federal Highway Administration, California Division Office</p> <p>Federal Transit Administration, Region 9</p> <p>U.S. Environmental Protection Agency Region IX Office</p>
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5.6.2 FEDERAL ADVISORY GROUPS

<p>Advisory Council on Historic Preservation Office of the Executive Director, Western Office of Planning and Review</p>	<p>Golden Gate National Recreation Area Citizens Advisory Commission</p> <p>National Parks Advisory Board</p>
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5.6.3 STATE AGENCIES

<p>Department of Education</p> <p>Department of Health Services</p> <p>Department of Transportation District 4</p> <p>Environmental Protection Agency Department of Toxic Substances Control, Chief, Northern California Operations Office of the Secretary</p>	<p>Governor's Office of Planning and Research Chief, State Clearinghouse</p> <p>Resources Agency Department of Conservation, Office of Governmental and Environmental Relations</p> <p>Department of Fish and Game</p> <p>Department of Parks and Recreation Office of Historic Preservation, Acting State Historic Preservation Officer</p> <p>Office of Historic Preservation, Chief, Review and Compliance Unit</p>
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5 . CONSULTATION AND COORDINATION

District Superintendent, Bay Area District
Headquarters

Department of Water Resources, Chief,
Environmental Review Unit

State Water Resources Control Board

Regional Water Quality Control Board, San
Francisco Bay Region

5.6.4 REGIONAL, COUNTY AND MUNICIPAL AGENCIES

Bay Area Air Quality Management District

City and County of San Francisco

Department of Parking and Traffic

Department of Planning

Department of Public Works

Municipal Railway, Planning Division

Public Utilities Commission, Systems
Planning and Regulatory Compliance

Golden Gate Bridge, Highway and Transportation
District

Metropolitan Transportation Commission

San Francisco Bay Conservation and Development
Commission

San Francisco Unified School District

5.6.5 AMERICAN INDIAN TRIBES

Amah Band of Ohlone/Costanoan Indians

Costanoan Band of Carmel Mission Indians

Costanoan Ohlone Rumsen-Mutsun Tribe

Costanoan-Rumsen Carmel Tribe

Federated Coast Miwok

Indian Canyon Band of Costanoan/Mutsun

Muwekma Indian Tribe

The Ohlone Indian Tribe

5.6.6 LIBRARIES

Marin Community Library

San Francisco Main Library

San Francisco Presidio Branch Library

San Francisco State University Library

5.6.7 ORGANIZATIONS

American Institute of Architects, San Francisco
Chapter

American Planning Association, Northern
California Chapter

American Society of Landscape Architects, San
Francisco Chapter

Audubon Society, Golden Gate Chapter

Bicycle Community Project

California Historical Society

California Native Plant Society, Bay Chapter

Coalition of San Francisco Neighborhoods

Cow Hollow Association

Cow Hollow Neighbors in Action

Exploratorium

Fort Mason Foundation

Fort Point Historical Society

Fort Point and Presidio Historical Association

Golden Gate National Parks Association

Hotel Employees and Restaurant Employees Union

League of Women Voters, San Francisco

Marina Civic Improvement and Property Owners
Association



5 . C O N S U L T A T I O N A N D C O O R D I N A T I O N

National Parks and Conservation Association	Presidio Heights Association of Neighbors
National Trust for Historic Preservation	Residential Mayors
Natural Resources Defense Council	San Francisco Beautiful
Neighborhood Association for Presidio Planning	San Francisco Chamber of Commerce
Pacific Heights Resident Association	San Francisco Planning and Urban Research Association
People for a Golden Gate National Recreation Area	San Francisco Tomorrow
People for the Presidio	Sierra Club, Bay Chapter, Presidio Task Force
Planning Association for the Richmond	Tenants Council Steering Committee
Preserve the Presidio Campaign	West Presidio Neighborhood Association
Presidio Alliance	Wilderness Society

