

Letter 21

356 Marietta Drive
San Francisco, CA 94127
July 25, 1999



NEPA- Compliance Coordinator
Attn: Letterman Complex
Presidio Trust
34 Graham Street
P. O. Box 29052
San Francisco, CA 94129-0052

Dear Sir/Madam:

Presently, there are two precedent-setting projects being undertaken in the San Francisco Bay Area that will have, albeit for different reasons, far-reaching, long-lasting, and irreversible environmental effects. The first of these is the proposed massive runway fill project at San Francisco International Airport and the second, of course, is the privatization of the San Francisco Presidio.

This Letterman Complex Draft Environmental Impact Statement (LCDEIS) raises a number of issues and questions with regard to the final proposals for the development of the 23-acre Letterman Hospital site and compliance with the guidelines set forth in the 1994 Presidio General Management Plan Amendment (GMPA), the Presidio Trust Act (PTA), and this very DEIS (LCDEIS).

Controversy is already developing regarding a pay-as-you-go policy for public land, which traditionally has been provided as a government service underwritten by U.S. taxpayers. In particular, is it really necessary to develop the Letterman Complex as a private "anchor" activity in order, to preserve the very existence of the gem-like Presidio? Although, the PTA established the Trust Board to oversee and manage private participation as a source of revenue for the operation, maintenance, and enhancement of the Presidio, the question still remains as to why experiment with the Presidio.

Included in the 1994 GMPA was Appendix F: Cost Estimate Summary, a one-page compilation in 1993 dollars, of estimated planning and construction costs for various Presidio areas. The Summary did split out National Park Service (NPS) costs from tenant costs but was remarkably vague as to the scope of the construction enhancements and any assumptions such as project life, life cycle costs, interest rates, schedules, etc.

21-1



NEPA- Compliance Coordinator

-2-

July 25, 1999

As such, it was almost impossible to determine how much any yearly-amortized amount of the \$666 million total would exceed the Secretary of Interior's \$25 million budget allocation for the Presidio.

It was the Trust Board with its Financial Management Plan (FMP) report to Congress in July, 1998, that forecast annual decreases of \$625,000 in the \$25 million annual budget allocation up through 2010 followed by accelerating decreases of \$3.125, \$3.000, and \$12.000 million in the final three years to meet the 2013 self-sufficiency deadline (Appendix B).

Apparently, then, the Trust Board trying to fast track this self-sufficiency commitment, planned to sell \$25 million in interest-only Treasury bonds (as authorized by the PTA (Sec. 104 [d][4]), in 1999 and 2000, in order to obtain up-front money for the Presidio revenue generating improvements.

The problem is, of course, that most of the revenue-producing Presidio projects must be in place well before 2010 in order to guarantee the program's success. The sharply decreasing Interior budget allocations, combined with debt service that jumps from \$3 million (6% of \$50 million) to \$5.1 million in 2013, creates a type of "balloon" payment scheme. This is a formula for certain failure if tight development schedules are not met or if the privatization of the "keystone" Letterman Complex falters.

21-1

The GMPA's \$666 million in 1993 dollars closely approximates (assuming an inflation rate of 2.25%/year) the \$752 million (2013) in 1998 dollars used in the FMP. The \$53.6 million revenues projected for 2004 (the anticipated Letterman Complex completion) correlate well with the revenue forecast from the Presidio activity areas listed in the FMP narrative; i.e., Letterman Complex, General Offices, Fort Scott, Public Health; Golf Course, and Utilities. Projected costs, however, do not correlate as closely.

One problem, however, is that the FMP anticipated revenue of \$44 million from the Letterman Complex is based on \$40/sf times 1.1 million sf, not the 900,000 sf of new replacement office space proposed. Assuming this rate is still valid, this \$8 million difference is significant because the Letterman Complex will generate approximately 82% of the projected revenue in 2004. The "keystone" Letterman Complex development, then, presents an "all our eggs in one basket" approach and will give any leasee negotiator (probably Lucas as front runner) considerable leverage.



NEPA- Compliance Coordinator

-3-

July 25, 1999

Under the PTA (Sec. 104 [o]), if the Presidio Board fails to accomplish its "goals and objectives" of self-sufficiency set forth in the FMP, all the Presidio designated as Area B (but not including the beach areas) will risk exclusion from the Golden Gate National Recreation Area (GGNRA), reversion back to the General Services Administration (GSA) and possible disposition under the Defense Authorization Act of 1990. This is not a very happy prospect for either environmentalists or the tax-paying public.

21-1

Because the Letterman Complex project disproportionately effects the preservation and protection of the historic, cultural, and natural attributes of the entire Presidio, and because the generation of private revenue sources are so critical under the PTA scheme, the inclusion of a thorough financial analysis in this DEIS is absolutely essential.

A somewhat related question to the above financial issue is, what are the true motives and sympathies of the seven-member Trust Board in its role as "lead agency" in this DEIS? Although the PTA specifically mandates (Sec. 103[c]), a Board with "knowledge and experience in ... city planning, real estate development, and resource conservation," there is precious little emphasis on preservation or protection.

21-2

I have already pointed out a potential financial "trap." There are other "traps" as well. The term "sustainability" is repeated throughout all the Presidio plans and statements but in light of recent newspaper coverage regarding certain Trust Board members and Mendicino County redwood timber holdings, the term "sustainability" apparently means different things to different people.

Similarly, the meaning of the term "trust" seems rather arbitrary. Trust, to me, implies a fiduciary relationship, which in this case, runs backwards from the Presidio Board through the GGNRA; Department of Interior, Executive, and to the tax-paying public. Anything less, to me, is conflict of interest.

21-3

Where then, does compliance with the guidelines set forth in the 1994 GMPA for the Letterman Complex begin to breakdown? After all, the PTA, FMP, and this DEIS, all echo the GMPA's call for the "preservation and enhancement of cultural, natural, recreation, and scenic resources."

Again and again, there is the mention of the "enhancement of social programs, environmental programs, shared spaces, public outreach, and public input into educational, artistic, scientific research, environmental, healthcare,



NEPA- Compliance Coordinator

-4-

July 25, 1999

philanthropic, conflict resolution, and international relations functions. How, then can these be anything but a mandate!

But this mandate goes much farther then just considering the preservation of the medical-related function of the original Letterman Hospital and Research Center with its expectation of the University of California San Francisco leasing the complex for bio-research. This goes to public benefit and to public access.

21-3

The Trust Board, obviously, recognized these conflicts with the 1994 GMPA because the Board, in order to facilitate the Letterman Complex development incorporated changes to the original GMPA into this DEIS. In doing so, it ignored the mandate. Changes to the 1994 GMPA for the Letterman Complex should have been handled separately as a discrete amendment open to public discussion.

On the subject of public hearings, the Board is well within its prerogative to have the GGNRA, as "cooperating agency," hold its public environmental meetings. In doing so, though, the Board, which is obligated to hold two public meetings per year, may have isolated itself, and failed in the EIS requirement for adequate public notice and opportunity for the public to be heard. All of these issues serve to further undermine the credibility of the Trust Board.

21-4

Now let's proceed to the specific environmental analysis of this Letterman Complex DEIS. The demolition and replacement of the Letterman Medical and Research facilities totals approximately 807,000 sf (rounded up to 900,000 sf) with about 522,000 sf (48 buildings) remaining intact within the 60-acre site. The Lucas Digital Art Center proposal, presently the front runner, would replace the 900,000 sf structure and also incorporate a 1260-car, two-level underground garage into its concept. Assuming that the garage would add at least 500,000 sf (550,000 sf according to the newspapers), this, together with the 522,000 sf of preserved buildings will exceed the 1.3 million sf Letterman Complex DEIS cap.

21-5

Generally, the final proposals comply with the guidelines for the preservation of historical buildings, scenic vistas, ground slope, architectural compatibility, natural drainage patterns, and height limits. There is, however, a certain sameness and predictability about all the proposals.

21-6

The proposed Lucas Digital Arts Center, does seem, though, to break ranks, albeit, too vague and too entertainment oriented, with its hi-tech concept. At the very least, the intriguing concept of a Digital Arts Center should be "fleshed out" in detail to cover the aforementioned "enhancements" and guidelines



NEPA- Compliance Coordinator

-5-

July 25, 1999

requiring "public interpretative services, visitor orientation, and educational programs." The Lucas organization certainly has the creative and technical talent, as well as the financial where-with-all to do this and much, much more. A clarification should also be included in any final EIS.

Remember that the provisions of the PTA already provide substantial tax and assessment-free status at the federal, state and local levels (Sec. 103 [c][9]), as well as significant (75%) loan guarantees (Sec. 104[d][1][c]), all at the U. S. taxpayers' expense. Therefore, both public access and beneficial use, as far as practicable, must remain part of the package.

The Trust Board must not become too enamoured with catchwords such as "animation, digital, and hi-tech." Twenty-five years ago a programmable hand calculator was considered a miracle. People then marveled at film animators like Disney and Harryhausen, both of whose accomplishments have been eclipsed by ILM and Pixar. Can complete life-like animation of "star" actors be that far off? Already we have seen an animated Japanese teen idol, Kyoko Date, and an ethnically controversial Star Wars character--Jar Jar Binks. The bottomline is that in twenty years, these present novelties will be common place technologies. The "light" and "magic" may very well vanish from ILM, leaving only the "industrial." Hopefully, the Trust Board will want something more substantial and permanent for the Presidio.

21-6

The Letterman Complex proposals plan heavy employee use of Gorgas Avenue to access underground parking facilities. The present PM peak-load off-ramp loading from Richardson Street to Gorgas Avenue is only 26 vehicles (LC DEIS) (Fig. 12e) per hour. With 2,500 anticipated employees, approximately 25% at which will come from either Marin County or the Peninsula (Table 12) and with Gorgas Avenue PM peak hour (presumably also AM), vehicle loads forecast at 750/hr. (Table 15), the Richardson Street off-ramp usage should increase at least five-fold. Add to this, external peak-hour trips (Table D3) forecast at 570/hr. (Table 14), and the congestion to and from Richardson Street, along Gorgas Avenue, is obvious.

21-7

Although in the past, Caltrans and the Golden Gate Bridge District have largely ignored the widening of Doyle Drive and realignment of the Richardson Street on/off access ramps, any backup at the Gorgas Avenue exit will almost certainly get a response. Potential Caltrans planning conflicts should be included in this DEIS.

21-8



NEPA- Compliance Coordinator

-6-

July 25, 1999

The same consideration should be given to the natural drainage patterns within the Tennessee Hollow Riparian Corridor. If there is a possibility that future runoff coefficients will increase beyond maximum discharge capabilities of this or any part of the 23-acre Letterman Complex, provisions for upgrading or enhancement should be made now.

21-9

The Lucas proposal anticipates seven acres of lawn with a lagoon, which will, of course, increase water consumption to 64,026 GPD (Table 10), well within the 89,000 GPD limit, but 46% greater than any of the other competing proposals. Irrigation will alone require 20,540 GPD (Table 11). Given the "operating efficiency" and "energy conservation" mandates, wouldn't landscaping with indigenous California plants using drip irrigation or a Japanese garden concept be more acceptable?

21-10

How can the Trust Board consider the concept of a specialized Digital Arts Center and still maintain that existing Presidio security and fire protection is adequate? Specialized facilities, especially computer complexes, require specialized alarm systems and support services.

21-11

Although the Lucas group has designated the Letterman Complex replacement buildings as office and archival space, specific divisions, such as THX, ILM, Lucas Arts, Lucas Online, and Lucas Learning have also been mentioned. I doubt that computerized graphics and digital images will constitute the only work product. For example, the "I" in ILM stands for "industrial." Art and special effects involve everything from paints to polymers to pyrotechnics. Unless, substantial guarantees are given that space will be for office functions only, copies of Material Safety Data Sheets (MSDS) from the Lucas facility in Marin County should be provided, summarized, and included in the final EIS.

21-12

What about fire and earthquake codes? The PTA (Sec. 104[m]), as well as this DEIS mandates compliance only with Federal (national) building codes. The San Andreas Fault, the second largest earthquake fault system in the country after the New Madrid, lies just outside the Golden Gate. Obviously the same potential earthquake and fire damage that haunts San Francisco also threatens the proposed Letterman Complex. Has everyone forgotten what the 1989 Loma Prieta temblor did to the Marina District just three blocks away? Shouldn't the more stringent San Francisco seismic and fire codes be mandated?

21-13

Now let's proceed to the real "sticking point" in this analysis. When I read the original draft 1993 GMPA DEIS, I applauded. Every environmental impact was covered by a corresponding mitigation—except for one—and that was how and who was going to pay.

21-14



NEPA- Compliance Coordinator

-7-

July 25, 1999

Now, the "who" has almost been decided, but sadly, not the "how." The proposed 99-year Lease period sounds more like an agriculture, grazing, or timber lease rather than an urban commercial lease. Certainly an investment recovery period, together with options to renew and provisions for cost escalation set by formula and based upon cost of living or construction indices should be incorporated. While it's understandable that lease negotiations should have some degree of confidentiality, it is also true that because of the significance of the Letterman Complex development and the precedent setting nature of this privatization venture, that lease guidelines be established that are made compatible with the Presidio's 1994 GMPA.

21-14

For example, both the final proposals for the Letterman Complex include private family-run corporations. Although corporations in theory have an unlimited life, few exist beyond a half century. Solely-owned corporations, particularly those built upon the creative genius of a single individual are vulnerable if that individual ceases to be. Succession is not always guaranteed, e.g., families DeBartolo, Haft, etc. Then, too, there is "merger mania." The Presidio Board must seek to guarantee continuity.

The PTA (Sec. 104[c]) requires the Board to develop a comprehensive Management Program. If this has already been done and it covers the specifics of lease provisions, e.g., reversions, conditions, enforcement, etc., together with details of scheduling and financing, it should at the very least be incorporated by reference or summarized in an appendix in this DEIS.

21-15

The bottomline is that guidelines for the lease agreement provisions should be part of the environmental impact mitigation package for the entire Presidio.

In conclusion, in most national park settings, we protect flowers and "furry" friends from the "Publicus Defilicus" but here in the Presidio, because of its uniqueness, and potential for a real estate development give-away, we must also protect against the "Privaticus Exploiticus". Lose this opportunity to preserve the Presidio, and you lose the Presidio forever. Therefore, it's time to use the force (between the ears), Luc.

From a concerned citizen,

Donald R. Beier



Responses to Comments in Letter 21

2 1 - 1

To provide more information regarding the financial context of Letterman Complex leasing, the Presidio Trust's July, 1998 Financial Management Program (FMP) is included in the Final EIS as Appendix E. Pursuant to the requirements of the Presidio Trust Act, the Presidio Trust prepared the FMP to demonstrate how the Presidio Trust could become independent of federal appropriations by fiscal year 2013. The FMP includes a description of the implementing policies and financial assumptions and analysis upon which the Presidio Trust's financial projections are based.

The commentator suggests that the Presidio Trust's plan to borrow funds from the Treasury, pay interest-only payments through year 2012, and then amortize the principal and interest as in a 15-year loan creates a "formula for certain failure if tight development schedules are not met or if the privatization of the 'keystone' Letterman Complex falters." The Presidio Trust's approach to use Treasury borrowing early to initiate capital projects allows for generation of the cash flow that will permit future repayment. An "interest-only" period during construction of a project is a typical financing structure. In fact, the length of the interest-only period proposed under the FMP allows a sufficient amount of time (14 years) to establish a revenue flow. It is true, however, that the Presidio Trust must proceed with capital improvements and leasing projects in a timely fashion.

Please note that the commentator misstates the FMP projection of revenue from the Letterman Complex as \$44 million, based on \$40 per square foot multiplied by 1.1 million square feet. While the FMP used \$40 per square foot as a fully serviced rent benchmark in valuing the 23-acre site, it did not expect that the Presidio Trust would collect that rent level. Rather, the Presidio Trust will ground lease the site and secure a revenue from the tenant that takes into account the capital investment required and operating costs of the site. The Trust's financial forecast assumes \$5.3 million of revenue from the Letterman Complex. Please refer to master response 10A.

2 1 - 2

The commentator's opinion regarding the qualifications of the seven-member Trust Board is noted for the record. It should be pointed out that several of the Board members have particularly strong backgrounds in preservation and protection and are recipients of a number of awards from national environmental organizations. Individual backgrounds of the Board members are available for review on the Presidio Trust's website (<http://www.presidiotrust.gov/about/index.asp>).

2 1 - 3

With respect to the issue of the consistency of the Trust's actions with the GMPA and the need for an amendment to the GMPA, the commentator is referred to master responses 2A and 2B. For a discussion of the Trust's mandates, refer to master response 1A. With respect to the assertion of conflict of interest, refer to master response 9A.

2 1 - 4

The Trust does not agree with the commentor's statement that there has been inadequate public notice and hearing opportunities. For a more complete response to this comment, refer to master response 1E and Section 5.1 of the Final EIS.

2 1 - 5

Refer to master response 11 for a discussion of how the 900,000 square feet was derived. With regard to the square footage allocated to parking, text has been added to Section 2 of the Final EIS to identify the proposed square footage of structured parking under each alternative.

2 1 - 6

The activities and programs proposed under Alternative 5, Digital Arts Center, are adequately described in Section 2.7.2 of the Final EIS. Section 104 (n) of the Presidio Trust Act requires the Presidio Trust to consider the extent to which prospective tenants contribute to the implementation of the GMPA and to the reduction of cost to the federal government. Public outreach programs are an important factor in tenant selection by the Presidio Trust Board of Directors. Note that Section 103 (c) of the Presidio Trust Act specifies that all *properties* administered by the Presidio Trust shall be exempt from all taxes and special assessments of every kind by the State of California and its political subdivisions. The *activities* of tenant organizations are subject to taxation. The Presidio Trust Act authorizes loan guarantees, but does not require their use. The commentor's opinion regarding the substance and permanence of the digital arts industry is noted for the record.

2 1 - 7

See master response 18.

2 1 - 8

See master response 18.

2 1 - 9

Refer to master response 15.

2 1 - 1 0

Turf grass was selected for its ability to withstand foot traffic, and benefit erosion prevention and storm-water management. When used judiciously, and in combination with appropriate maintenance practices, turf grass represents a sustainable design response to expected uses. In Alternative 5, the lawn area would not be a monoculture of turf grass. Instead, turf grass would be limited to the extent required to allow for the informal outdoor activities anticipated, with the balance and majority of the open space, planted in trees, shrubs and lower perennials. A diverse palette of horticulturally appropriate and native plantings designed to enhance educational and interpretive opportunities, and wildlife habitats would be utilized in combination with turf grass. Water conservation would be a primary consideration. Soils would be amended and graded to improve water retention and availability. Where used, the turf grass would be selected from varieties with demonstrated deep roots and relative drought tolerance. A programmable and zoned irrigation system would be installed to supply water at rates and frequencies tuned to individual plant needs and variations of microclimate, slope, and



exposure. Finally, long-term maintenance practices and water use monitoring systems would be established to maintain water conservation over time.

2 1 - 1 1

Based on discussions with the development team for the preferred alternative, the Presidio Trust has no reason to assume that any extraordinary police or fire protection would be required for a Digital Arts Center beyond what was previously analyzed in Sections G.6, Law Enforcement Services and G.7, Fire Protection Services in Appendix A of the EIS.

2 1 - 1 2

No health or safety risks related to the releases of hazardous substances or pollutants are in any way foreseen in connection with the operation of a Digital Arts Center. Any sensitive materials stored onsite such as aerosol containers, paint, solvent and thinners would be managed and disposed of in accordance with the Presidio Trust's Standard Operating Procedure for Hazardous Waste/Materials Management and all applicable federal, state, and local regulations.

2 1 - 1 3

The design for new construction would comply with national building codes, including site-specific seismic criteria, the same as all major structures in San Francisco and other major cities. The 1997 Uniform Building Code is used for newly constructed buildings in San Francisco. San Francisco does not have any more stringent design criteria than any other jurisdiction in Seismic Zone 4 and the Presidio Trust's design criteria for seismic would be that for Seismic Zone 4. The Marina is not comparable to the Presidio since it is fill and loose bay mud; this is not the same material as the ground on which the Letterman Complex is built.

2 1 - 1 4 A N D 2 1 - 1 5

Comment noted. NEPA does not require analysis of specific lease terms or review at various implementing steps of a project. However, NEPA does require that federal agencies review major actions that significantly affect the environment as a whole. This necessary environmental analysis for new development at the Letterman Complex is included in the EIS. The Presidio Trust does not agree with the commentor's suggestion that lease guidelines be established that are compatible with the 1994 GMPA. The GMPA is a conceptual land use plan. In executing leases, the Presidio Trust must comply with the requirements of the Presidio Trust Act. Section 104(a) of the Presidio Trust Act requires the Presidio Trust to manage the leasing of property within the Presidio using the authorities provided in the Presidio Trust Act, exercised in accordance with the purposes set forth in section 1 of the Act which established the GGNRA, and in accordance with the General Objectives of the GMPA. For response to the comment concerning a comprehensive management program, please refer to master response 4A.

Letter 22



PRESIDIO TRUST REC'D

JUL 29 1999 2:08

SAN FRANCISCO BICYCLE ADVISORY COMMITTEE
25 Van Ness Avenue, Suite 345, San Francisco, California 94102

morrlock@aol.com
415-282-8564

July 24, 1999

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

Attention: NEPA Compliance Coordinator
Letterman Complex

Re: Letterman Parcel

Gentlepeople:

The San Francisco Bicycle Advisory Committee ("BAC") is an advisory body appointed by the Board of Supervisors to deal with issues of bicycle safety and accessibility for both bicycle commuters and recreational cyclists.

The BAC has been following the hearing process surrounding the Letterman Parcel Draft SEIS. We have discussed the document both in general meeting and at sub-committee level. We have elicited and received questions and comments from the public. While we greatly appreciate the efforts made by the Trust so far to ensure good access for bicyclists and pedestrians, based on information compiled to date we would like to express the following concerns:

1. In the configuration now being considered, there is a designed-in excess of parking (1530 versus 1260). This excess is specifically mentioned as a possible obstacle to implementation of a vigorous Transportation Demand Management plan:

"A surplus in parking spaces could compromise the TDM strategies designed to encourage non-automobile modes, and could potentially result in an increase in vehicle trips to the site." (DEIS, p. 165.)

We urge that the size of the underground garage in question be negotiated downward, and that no excess be permitted which might compromise the implementation of the most effective TDM mitigation measures.

22-1



Presidio Trust
July 25, 1999
Page Two

2. We are concerned regarding the meaning of the words "planned improvements" as used in the following sentence:

"Planned improvements would enhance the pedestrian and bicycle environment, and facilitate the safe and direct travel of pedestrians and bicyclists to and from the site." (DEIS, Article 4.5.7.4, p. 165)

22-2

What improvements?

We are particularly concerned about access at the Lombard gate and streets to the west (designated on the Official San Francisco Bicycle Route Map as Bike Route 4). The Lombard/Lyon intersection already falls to Level of Service E at evening peak hour, as cited in the DEIS.

3. If there is new signalization at Lombard/Lyon and restriping to provide one left turn lane and one shared right-through lane (p. 36), these changes will dangerously constrict this entrance from the standpoint of safe passage for bicyclists. The gate itself makes widening at this point unlikely. These changes should be made only after safe alternatives for bicyclists have been developed.

22-3

4. With respect to subsections (2) and (3), Mr. Tilles, Transportation Manager for the Presidio, has suggested that a possible solution to these questions and difficulties might be the opening of a new entrance in the Lyon Street wall; perhaps at Greenwich, an entrance which would serve bicyclists and pedestrians alike (and which would also create a better transition from Bike Route 4 east of Lyon than now exists).

22-4

We appreciate any steps in this direction and encourage open dialogue, but regard the DEIS as inadequate for its failure to speak more specifically of and propose mitigation measures for the above-described threats to "... the safe and direct travel of pedestrians and bicyclists to and from the site."

Sincerely,



James Morrison
Bicycle Advisory Committee

JM:sg



Responses to Comments in Letter 22

22-1

Refer to master response 20.

22-2 THROUGH 22-4

The points made about congestion at the Lombard Street Gate and its impact on bicyclists are noted. The Presidio Trust's Transportation Manager agrees that the proposed changes that are necessary for traffic flow and pedestrian safety could adversely impact bicycle flow at the gate. (Please note that current level of service at the Lombard/Lyon intersection has been revised to LOS C in the p.m. peak hour to correct a typographical error that was made in the Draft EIS.) The Presidio Trust is proposing alternative routes for bicycle traffic that is now accessing the Presidio via the Lombard Street Gate. Since Lombard Street is primarily a traffic and transit street and not on the bicycle network, it is not in any case the ideal street with which to be connecting. The city's bike route 6, on Greenwich Street, could enter the Presidio through a break in the Presidio wall at the former Greenwich Street Gate; however, this would be subject to further analysis and is outside of this project's area. Bike route 4, on Francisco Street, would be relocated to Chestnut Street and enter the Presidio through either the Gorgas Avenue Gate or on an expanded bicycle and pedestrian path from the Lombard Street Gate (see new Figure 18 and new mitigation measures TR-6, *Relocation of the City's Bike Route 4*, and TR-7, *Adjustment of Bicycle Entry Points Near the Lombard Street Gate*, in the Final EIS). The precise route, as well as options for route 6, would be investigated under the Presidio Trails and Bikeways Master Plan which is currently under preparation by the NPS and the Presidio Trust and will involve extensive public input in its planning. Please see master response 25.

Letter 23

PRESERVE THE PRESIDIO CAMPAIGN
1278 – 44TH AVENUE
SAN FRANCISCO, CA 94122
415-731-1434 phone
415-753-3877 fax

PRESIDIO TRUST REC'D

JUL 29 1999 3:06

July 29, 1999

NEPA Compliance Coordinator
Attn: Letterman Complex
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

Dear Presidio Trust Board Members:

We, as the present generation, will probably be remembered not by what we build but by what we destroy but could have saved. That thought should frame the Presidio national park issue.

The DEIS is inadequate, incomplete, and misleading. The DEIS should be reissued with an additional period of time for public comment and public hearings. The Presidio Trust Board should have one or more public hearings on the DEIS itself. The Presidio Trust Board should stop meeting behind closed doors to discuss the Letterman development project.

23-1

How has the Letterman DEIS followed all NEPA related regulations, NEPA legal mandates, and NEPA related case law?
Can a detailed analysis be included in the DEIS as an appendix on this subject?

23-2

The proposed massive for-profit \$253 million, 1.49 million gross square feet, 23 acre Lucas business park complex, which is equivalent to nearly three Transamerica buildings, will include, if built:

23-3

- 836,000 square feet of new commercial office space.
- 589,000 square feet of new underground parking space with 1,500 parking spaces.



Page Two

- 50,000 square feet of retail space.
- 2,500 employees who will utilize 300 residential units with one or more bedrooms within the Presidio national park; and
- Three large buildings.

The proposed lease will be between 90 and 100 years long. This development was the largest project proposed by any developer and provides the least public access of all the proposals.

23-3

National park new commercial development as proposed by the Lucas development team, where a privately held corporation stands to make tens of millions of dollars per year in profits and which will have little to do with enhancing the visitor's park experience, is unprecedented in American history.

Why isn't the true size of this project in the DEIS?

Can you explain clearly why this project is unprecedented in the national park system?

23-4

Why haven't the lease conditions been analyzed in the DEIS?

23-5

Shouldn't the lease also be subject to NEPA review?

23-6

Why isn't the developer preparing a detail EIS for this project?

23-7

Why hasn't an amendment to the GMPA been done before the release of this DEIS?

23-8

The 60-acre Letterman complex is a nationally significant landmark district site, in a national park, because of its 34 historic buildings and its historic cultural landscape.

The original hospital was established in 1898. Soldiers, from every American military conflict for almost a century, were brought here to die, to get well, or to overcome disabilities because they served their country. Letterman hospital was the U.S. Army's largest hospital in World War I, and it was the nation's busiest hospital in World War II. This hospital pioneered the development of physical therapy techniques.

23-9

Now, it is to become the home of an entertainment industry leader that specializes in unreal virtual reality battle scenes where violence is sanitized and romanticized.

The two cannot possibly fit together. A northern California Hollywood entertainment industry complex will devalue why this is an historic national park site.



Page Three

How can the Lucas project be built without harming the historic cultural landscape of the site? 23-9

Wouldn't this project be similar to building on or near a significant Civil War historic site? 23-10

The incompatible and inappropriate industrial-oriented Lucas complex is unambiguously and unequivocally inconsistent with:

- the July 1994 Final General Management Plan Amendment for the Presidio National Park.
 - the National Historic Landmark District.
 - the 1916 Organic Act that established the national park system.
 - the 1972 federal legislation that established the GGNRA.
 - the 1996 Presidio Trust legislation.
- 23-11

Can a detail analysis be completed that clearly identifies how the Lucas project is inconsistent with the five key documents just listed?

Can a detail analysis be completed that specifically identifies how the Lucas project conforms with the five key documents just listed? 23-12

Can the DEIS explain in detail how the preferred alternative conforms with the newly invented, but bogus, four "general objectives of the GMPA" identified on page six? 23-13

Can the DEIS explain in detail how the preferred alternative conforms with the eight objectives listed on page four of the Summary? 23-14

How does the Lucas project deviate from the July 1994 Final General Management Plan Amendment for the Presidio National Park? 23-15

Can an appendix be added to the DEIS that includes all text sections in the July 1994 Final GMPA that relates to the Letterman district in the Presidio? 23-16

Now that a developer has been identified, why can't a new detailed EIS be done on the specific development project? 23-17

Can the nearly century long lease and the decades long conditions be subject to NEPA review and be included in this DEIS? 23-18

According to the Presidio national park July 1994 final general management plan amendment, the Letterman site was designated as a "science and education center" that "will be devoted to issues of health, life, and earth sciences." Letterman, according to the master plan, "will be used to...support research and actions to improve human and environmental health. Life and earth science programs will be explored to better 23-19



Page Four

understand and manage the interdependence of health and environment.” The binding master plan also states that the Letterman site “will be dedicated to scientific research and education focusing on issues of human health, including preventive medicine, nutrition, collaborative eastern/western medicine, and health concerns related to the environment.”

23-19

The Lucas development is clearly inconsistent with these programmatic objectives.

How is the Lucas project inconsistent with the 1994 Final GMPA?

Park-wide new construction, according to the legally binding July 1994 final general management plan amendment master plan for the Presidio National Park, is limited to a total of 665,000 square feet. The 1.49 million gross square feet of new construction in the Lucas complex alone will be over two times higher than the new construction ceiling established by the park’s master plan. In addition, the 1.3 million maximum allowable square footage for the Letterman district which is also established in the park’s master plan, will be exceeded if the Lucas development is built.

23-20

Why will the Lucas complex exceed these two ceiling limits?

What other parts of the final GMPA for the Presidio National Park does the Presidio Trust Board and the developer intend to violate or ignore?

23-21

Does the developer and the Presidio Trust intend to follow the final GMPA or not?

23-22

Has the Presidio Trust voluntarily agreed to follow the final GMPA for the Presidio National Park?

23-23

Does the Presidio Trust believe that they are to follow the legally binding final GMPA?

23-24

The fundamentally flawed Presidio Trust Act was signed into law by the President on November 12, 1996. The President said at the time, “It gives us a blueprint for national parks that one day will be able to sustain themselves without government funds.”

This law allows the first conversion of a national park into a business park. This law requires, for the first time in American history, that a National Park unit be economically self-sufficient within 15 years or it will be dropped from the park system. This law, again for the first time, removed the National Park Service, with their preservation ethic, from stewardship and control over this national park, except for the small shoreline area.

23-25



Page Five

The Presidio national park legislation, which is an anti-park, anti-environment, pro-privatization and pro-corporate welfare development scheme, is the first step towards dismantling the national park system as we have known it since 1916. This legislation opens the door to other national park units being converted to money-making commercial operations controlled by private interests. 23-25

Why isn't there any analysis of how this will effect the Presidio or the national park system?

How is the Presidio national park unit different from other national park units? 23-26

Why isn't the Presidio under the control of the National Park Service? 23-27

The developer-friendly Presidio Trust has the power to offer corporate welfare to developers through—

- tax credits for rehabilitation projects.
 - state and local tax exemptions.
 - low interest taxpayer subsidized loans.
 - guarantees to lenders against loss of principle or interest on loans.
 - long-term sweetheart leases which are "as good as a sale" as Don Fisher called them.
 - huge federal tax dollar inflows into the Presidio for infrastructure improvements, environmental clean-up, and other projects.
- 23-28

How much corporate welfare will the developer receive for this Letterman business park complex?

What tax breaks, rent breaks, tax credits, and other government giveaways are tied up with this huge development project? 23-29

Can all public subsidies involved with this project be disclosed? 23-30

What is the costs to the City and County of San Francisco to deliver public services to this development project? 23-31

The fictitious and deliberately false "general objectives of the GMPA" identified on page six of the DEIS are not in the July 1994 Final General Management Plan Amendment for the Presidio National Park. These so-called "general objectives" were invented without legal mandate, without environmental review under NEPA, without public hearings, and without changing the final, and legally binding, General Management Plan Amendment. 23-32

Why was this done?

What process was followed to make up these self-serving but false "general objectives"? 23-33



Page Six

Will new so-called “general objectives” be created in the future by the Presidio Trust Board? 23-34

Isn't this an abuse of power? 23-35

Why wasn't the GMPA changed legally before pursuing large-scale development at the Letterman site? 23-36

The pro-development, conflict-of-interest riddled, secretive seven-member Presidio Trust Board, which is unelected, unaccountable, and undemocratic, has consistently pursued redevelopment policies that will lead to the first conversion of a national park into a business park in the United States. 23-37

What are the conflict-of-interests that exist, if they exist, for each Presidio Trust Board member concerning the Lucas development project? 23-38

How have these conflicts been publicly disclosed? 23-38

What are the professional, personal, and social connections between the Presidio Trust Board members and the Lucas development team members? 23-39

How were Presidio Trust Board members lobbied during the selection process? 23-40

How was Lucas selected behind closed doors? 23-41

George Lucas, who is an out-of-town, multi-billionaire real estate developer, has learned how to market his Star Wars brand name into a large growing business empire. Links to unhealthy fast food chains, merchandizing, and crass consumerism will continue as the business expands. 23-42

Why is this appropriate in a national park setting? 23-43

Why should insatiable greed, crass consumerism, and reckless desecration of a historically significant site be tolerated in a national park? 23-43

The Lucas project will convert a national park site into a business park and change public parkland property into, in effect, private property. This massive for-profit, family owned new commercial development complex will have little public access. 23-44

Why is parkland being closed off to the public? 23-45

What will be the public access policy for the three large buildings? 23-45

What if Lucas in future years wants to expand his complex? 23-46

What financial information has the Lucas development team withheld from public disclosure? 23-47



Page Seven

Can the DEIS include an appendix which lists all written communications that the Lucas development team has submitted to the Presidio Trust to date? 23-48

What information has the Lucas development team hidden from the public? 23-49

What kind of precedence is being set for future developers who want to exploit the Presidio for new commercial development projects? 23-50

What will be the growth inducing impacts of this development on the national park system, the Presidio national park, and the surrounding residential neighborhoods? 23-51

What programmatic and economic issues concerning the Lucas project were discussed during the two weeks before the announcement? 23-52

Which community and planning groups supported the Lucas project and why? 23-53

Can detail minutes of all meetings where the Lucas development team made presentations before the Presidio Trust Board and Presidio Trust staff be included as an appendix in the DEIS? 23-54

There are two alternatives that need fuller discussion and disclosure:

- 1.) Reuse of the two large non-historic existing buildings on the site to prevent the waste of millions of federal tax dollars, limited resources, and the extraordinary amount of energy that it took to create these buildings in the 1960's and 1970's. 23-55
- 2.) Demolition of the two huge non-historic buildings on site and returning the land to open space to create a buffer between the built environment in the Presidio national park and the surrounding residential neighborhoods. 23-56

The executive director of the Presidio Trust claims the selection of the Lucas project was done after a "10-month open, public process". The Presidio Trust Board did not have a single public hearing meeting on the DEIS during the entire public comment period for the DEIS. Involvement does not mean meaningful public participation. Mr. Meadows claims that there were 110 public outreach sessions in 1998 and that "nearly 1,500 people at public meetings" participated in the Letterman project decision. 23-57

Why hasn't the Presidio Trust Board had a public meeting on the DEIS? 23-58

Why isn't timely meaningful public participation allowed before the Presidio Trust Board? 23-59

What does the Presidio Trust Board mean when it refers to environmentally sustainable and economically sustainable? 23-60

Can an appendix to the DEIS identify the 110 public outreach sessions for 1998, the subject, and the number of people that attended each session?



Page Eight

- How many had to do specifically with the Letterman development project?] 23-61
- Of the “nearly 1,500 people”, how many unduplicated individuals participated in the Letterman meetings?] 23-62
- How many of these individuals were lobbyists, development team members, Presidio Trust consultants, and Presidio Trust staff?] 23-63
- How many members of the public attended Letterman related meetings after subtracting lobbyists, development team members, Presidio Trust consultants, and Presidio Trust staff?] 23-64

- If the City of San Francisco withdrew City services such as sewage treatment, water supply, transit, and other public services, how would the Presidio Trust provide these services?] 23-65
- Is the City of San Francisco legally obligated to provide public services to the Presidio national park?] 23-66

- Would the Lucas project preclude any previously identified alternatives for reconstruction of Doyle Drive?] 23-67
- Shouldn't the Doyle Drive project be approved before the Lucas development project moves forward?] 23-68

- Does the Lucas project intend to pay any fees or taxes to the City of San Francisco?] 23-69

- There is only one page, page 32, where there is a limited bird's eye view of the Lucas complex.] 23-70
- Can the DEIS disclose and include accurate computer images of the development from several vantage points to reveal height, bulk, mass, architecture, vistas, views, shadows, and other features relevant to understanding the impacts of the project?] 23-70

- Can all the sections of the Final General Management Plan Amendment of July 1994, that relate to the Letterman site, be included as an appendix to the DEIS?] 23-71

- Can there be a side by side text comparison and analysis between what was envisioned by the Final GMPA for the Letterman site and what has been identified as the preferred alternative?] 23-72

- Has a project like the preferred alternative ever been built in a national park unit?] 23-73



Page Nine

If there are, can the DEIS disclose all similar projects throughout the national park system with gross square footage, location, and functional uses? 23-74

Where did the 47-page “Draft Planning Guidelines” come from? 23-75

Have they been approved by the Presidio Trust Board? 23-76

Were they subject to public hearings and environmental review? 23-77

Can the DEIS define and accurately disclose total gross square footage for total new commercial development which would include the square footage for the underground parking? 23-78

Why should a private for-profit corporation takeover a large part of a national park? 23-79

Wouldn't this global corporation which has world-wide impact dominate the Presidio national park? 23-80

Why should public resources be exploited by private interests seeking private profit? 23-81

Isn't it inappropriate to turn over part of a national park to a private corporation? 23-82

Isn't this project a betrayal of what a national park unit is suppose to be? 23-83

Why are heavy-handed private sector market forces being allowed to come into the Presidio? 23-84

Market forces—seeking profits, natural resources, and public subsidies—are exploiting and plundering an irreplaceable, priceless scenic and historic park area. Muir and Thoreau helped establish the national park system to protect places from the ravages of development, to take lands off the market forever, and to ensure public control. The Presidio Trust is moving in the opposite direction in all three areas.

If the Presidio Trust cannot operate successfully like other national park units throughout the country with a clear preservation mission, then the Presidio Trust legislation needs to be changed and the current Presidio Trust members need to be removed.

The five-year-old, all volunteer, San Francisco-based Preserve the Presidio Campaign is working to:



Page Ten

- 1.) Recruit public interest attorneys to bring timely environmental litigation in U.S. District Court to delay or block new commercial development in the Presidio national park.
- 2.) Prevent privatization of the park in which valuable public resources are turned over to private corporate interests.
- 3.) Preserve the unique natural, recreational, cultural, historic, and scenic attributes of the park unimpaired for future generations.
- 4.) Amend the fundamentally flawed business-park oriented Presidio Trust legislation.

Sincerely,



Joel Ventresca, Chair

Responses to Comments in Letter 23

23 - 1

The comments are noted for the record. For response to the comment concerning the Trust's and the Board's public outreach process, refer to master response 9B. Refer also to master response 1E and Section 5.1 of the Final EIS.

23 - 2

For response to the general question about the Trust's compliance with NEPA, refer to master response 1B. Also, please see master response 1D.

23 - 3

As summarized in Table 1, the EIS appropriately analyzed the environmental impacts of six alternatives including four that would entail 900,000 square feet of replacement construction and associated parking on a 23-acre site. The true size of each alternative is represented in the EIS. For response to the comment concerning the effect on visitor experience, refer to master response 25.

23 - 4

For response to the question seeking a basis for such a unique project in a national park, refer to master response 8 and Section 1.1 of the Final EIS.

23 - 5 AND 23 - 6

Because there are no lease conditions to analyze, there is no such obligation under NEPA. Please refer to the response to comment 21-14.

23 - 7

Under NEPA, the responsibility for the scope and contents of an EIS rests with the federal agency and not the developer in order to avoid a conflict of interest. The EIS contains sufficient site-specific information relevant to adverse impacts for decision-making.

23 - 8

On the question of an amendment to the GMPA and on the consistency of the Trust's actions with the GMPA, the commentor is referred to master responses 2A and 2B. See also master response 4A.

23 - 9

Refer to master responses 7A and 23.

23 - 10

The Presidio is a National Historic Landmark district, as stated and described in the Final EIS, and the features and elements which contribute to the landmark status are documented in the 1993 National Historic Landmark Update. Construction at the Presidio is not similar to new construction on or adjacent to a significant Civil War site; the only similarity between the two places is that they may both be listed on the National Register of Historic Places. New construction at the Presidio, in accordance with the provisions under the National Historic Preservation Act, must be compatible with the historic setting to ensure there is no adverse effect on the

Landmark status. Conformance with the Final Planning Guidelines and later Design Guidelines is intended to ensure that new construction is compatible with the historic district. Furthermore, the design development process will include consultation with the SHPO, ACHP, and NPS as detailed in the Programmatic Agreement in Appendix F of the Final EIS.

23 - 11

The Trust believes it is complying with all the laws applicable to the actions it takes. For response to the comment concerning the Trust's compliance with the Trust Act, refer to master response 1A; and concerning the Trust's compliance with the NPS Organic Act, the GGNRA Act, and the National Historic Preservation Act, refer to master response 1C. With respect to compliance with the GMPA, the commentor is referred to master response 2A.

23 - 12

Refer to the response to comment 23-11. Also, please see master responses 1A, 1C, and 2A.

23 - 13

For response to the comment that the Trust identified "bogus" general objectives of the GMPA, refer to master response 3A. On the consistency of the Trust's actions with the GMPA, refer to master response 2A. With respect to how the preferred alternative conforms to the General Objectives of the GMPA, the commentor is referred to master response 3B. In sum, the Trust believes that the Digital Arts Center (Alternative 5) conforms to the General Objectives of the GMPA (see Section 4.5.1.1 of the Final EIS) as well as a number of the more specific goals and planning principles of the GMPA (see Section 4.5.1.2 of the Final EIS).

23 - 14

The commentor requests the Trust to state how the preferred alternative meets each of the eight objectives listed on page iv of the Letterman Draft EIS. The first concerns consistency with the purposes of the GGNRA Act, which is discussed in master response 1C, and with the General Objectives of the GMPA, which is discussed in master response 2A. The second objective concerns responsiveness of the preferred alternative to the requirements of the Trust Act, which is discussed in master response 1A, and in Section 1, Purpose and Need in the Final EIS. The third objective addresses the user's ability to finance the project, which was determined by the Trust Board from financial disclosures made as part of the Letterman RFQ/RFP proposal presentations (see Section 2.1 of the Final EIS). The financial needs and assumptions for the Letterman project are more fully discussed in master responses 5 and 10A and in Section 1.2.2, Achieving Financial Self-Sufficiency. With respect to the fourth and fifth objectives, furthering the Presidio goals and involvement in identified desirable sectors, the proponent for the preferred alternative has presented a proposal that includes working in the arts, communication, research and education, as well as constructing structures and operating those structures in an environmentally sustainable manner (see Section 4.5.1.2, Consistency With Approved Plans and Policies). With respect to the last three objectives, through the Programmatic Agreement, the Trust would oversee new design and site any new construction to be compatible with the Presidio's National Historic Landmark status (see master response 7B and Section 1.2); the proponent would participate in a transportation demand management program for the Presidio, and would take actions to reduce automobile use by employees

and visitors (master response 19); and would construct and operate any structures in an environmentally sustainable and responsible manner (refer to the Planning Guidelines in Appendix B of the Final EIS, which would guide the development at the Letterman Complex).

23 - 15

The inconsistencies of the Digital Arts Center with the July 1994 GMPA are discussed in Section 4.5.1.2 of the EIS.

23 - 16

The commentor is referred to Appendix A of the EIS for a discussion of all impact topics that are addressed in site-specific detail for the Letterman Complex in the GMPA EIS.

23 - 17

A new detailed EIS is unnecessary because this EIS contains sufficient site-specific information for reviewers to evaluate and compare a range of development projects, including the preferred alternative, which mirrors the specific development project in question. Under applicable regulations governing NEPA, a preferred alternative is always identified in either the Draft EIS or Final EIS (unless a specific statute provides otherwise, which is not the case here).

23 - 18

Please see master responses 23-5 and 23-6.

23 - 19

For a complete discussion of the relationship of the Letterman project to the GMPA, please refer to master response 2A and Sections 1.1 and 1.2 of the Final EIS. Also see response to comment 23-15.

23 - 20

Please refer to master response 11.

23 - 21

The Trust's compliance with the GMPA and its General Objectives is discussed in master responses 2A, and 3A and 3B. The Trust has relied upon the GMPA as its master plan, and has proposed this project as a rational means of satisfying the requirements of the Trust Act while at the same time implementing the GMPA consistently with its General Objectives. See Section 1.2 of the Final EIS.

23 - 22 THROUGH 23 - 24

Yes. The commentor is referred to master response 2A for a more complete response.

23 - 25

The commentor's opposition to the Trust's enabling legislation and concerns about the Presidio are noted for the record. Both the GMPA EIS and this EIS analyze how the contemplated action would affect the environment of the Presidio. An analysis of the effect of the Trust Act upon the national park system is beyond the scope of the contemplated site-specific action and beyond the Trust's authority. For further response to the comment, refer to master response 8 and Section 1.1 of the Final EIS.



23 - 26

For response to the question concerning how the Presidio differs from other national parks, refer to master responses 1A and 8.

23 - 27

For response to the question why the Presidio is not under control of the NPS, refer to master responses 1A, 1F, and 8. In addition, for further information on the reasons for creation of the Trust and for transfer of a portion of the Presidio land and buildings from the jurisdiction of the NPS to that of the Trust, the commentor is directed to House Report 104-234, as issued on August 4, 1995 by the U.S. House of Representatives and to the discussion in Section 1.1 of the Final EIS.

23 - 28

The Presidio Trust Act and other federal legislation provide for a range of specific legal authorities and programs, including those alluded to by the commentor:

- *Federal Historic Rehabilitation Tax Credit* – This federal income tax credit program is available to qualified entities that rehabilitate eligible historic properties nationally. New replacement construction at the Letterman Complex would not be eligible for this program.
- *State and Local Tax Exemptions* – Section 103(c) of the Presidio Trust Act states that the properties administered by the Presidio Trust shall be exempt from all taxes and special assessments of every kind by the State of California and its political subdivisions. It should be noted that services typically provided by municipal government (police, fire, emergency medical, infrastructure maintenance, etc.) are provided by the Presidio Trust. The *activities* of Presidio tenants are not exempt from state and local taxes.
- *Loans and Loan Guarantees* – To augment or encourage the use of non-federal funds to finance capital improvements on Presidio properties, the Trust Act authorizes the Presidio Trust to make loans, subject to appropriations, to the occupants of Trust-managed property, for the preservation, restoration, maintenance, or repair of such property. The Trust Act also authorizes the Presidio Trust to guarantee lenders against loss of principal or interest on any loan, subject to approval of terms by the Secretary of the Treasury and other requirements stated in the Trust Act. Presidio tenants may also be eligible for other loan or loan guarantee programs administered by other agencies.
- *Long-Term Leases* – The Presidio Trust may enter into long-term leases. Long-term leases allow for an appropriate return on tenant investment in building rehabilitation or new construction.
- *Federal Investment in Infrastructure Improvements, Environmental Cleanup, and Other Projects* – As anticipated by the Trust Act, the Presidio Trust will invest congressionally-appropriated funds to maintain and manage those areas of the Presidio under its jurisdiction as part of the national park system prior to reaching financial self-sufficiency. Pursuant to the Base Realignment and Closure Act, the Department of the Army has a legal responsibility to fund the environmental cleanup of the Presidio.

The Presidio Trust disagrees with the commentor’s opinion that the aforementioned legally authorized lease terms and funding/financing programs are “corporate welfare.”

23 - 29

The Presidio Trust would not execute a lease for the 23-acre site until completion of the entire EIS process. Accordingly, there is no specific response to the commentor’s request for information related to a lease agreement.



As stated in the Request for Qualifications to lease the 23-acre site, the Presidio Trust expects market rent, payment of a service district charge to fund the cost of police, fire, emergency medical, and infrastructure services provided by the Presidio Trust, and payment of all applicable fees and taxes.

2 3 - 3 0

The Presidio Trust disagrees with the commentor's opinion that there will be public subsidies of proposed development within the 23-acre site.

2 3 - 3 1

The costs to the City and County of San Francisco for providing services to the Letterman Complex were considered as part of the analysis presented in the Impacts on City Services section on pages 168 through 172 of the GMPA EIS from which the Draft EIS tiers. The current development project would not result in any additional costs that would accrue to the city of San Francisco that were not previously analyzed in the GMPA EIS.

2 3 - 3 2

For response to the comment concerning the General Objectives of the GMPA, refer to master responses 3A and 3C.

2 3 - 3 3

For response to the question concerning the process followed to identify the general objectives of the GMPA, refer to master response 3A. Also, please see master response 3B.

2 3 - 3 4

The process of identifying the General Objectives of the GMPA is discussed in master response 3A. The General Objectives of the GMPA were not "created" by the Presidio Trust Board; rather, Congress directed that the Presidio Trust follow the General Objectives. As those general objectives already exist implicitly within the GMPA, the Trust has, in an exercise of its administrative discretion, ascertained the General Objectives but cannot "create" general objectives in the future. For further response to the comment, refer to master responses 3A and 3C.

2 3 - 3 5

For response to the question concerning the Trust's authority to identify the General Objectives of the GMPA, refer to master response 3A.

2 3 - 3 6

For response to the comment concerning changing the GMPA before pursuing development at the 23-acre site, refer to master response 2B, and refer to master response 2A for a discussion of the conformity of the Trust's decisions with the GMPA.

2 3 - 3 7

For response to the comment concerning asserted conflicts of interest, refer to master response 9A.



23 - 38

There is no conflict of interest that requires disclosure. For further response to the comment, refer to master response 9A.

23 - 39

For response to the comment, refer to master response 9B. This comment does not address issues related to the NEPA analysis. The NEPA regulations provide that comments on an EIS need only address the adequacy of the statement or the merits of the alternatives discussed or both.

23 - 40

Please refer to master response 9B and response to comment 23-39.

23 - 41

Please refer to master response 9B and response to comment 23-39.

23 - 42

The commentor is referred to Section 4.5.1, Consistency with Approved Plans and Policies, for a discussion as to how the Digital Arts Center is appropriate in a national park setting. Please also see Sections 1.1, 1.2, 2.1, and 2.2 of the Final EIS.

23 - 43

Please refer to the response to comment 23-42.

23 - 44

Public access impacts of the alternatives are addressed in Sections 4.1.8.5, 4.2.8.7 through 4.5.8.7, and 4.6.8.5 (Effect on Visitor Experience) within the Final EIS. The preferred alternative's 7-acre public lawn would be a significant open space addition to the park and would be accessible to all park visitors. Also, see master response 25.

23 - 45

The public would not be able to access the building interiors, except for the public lobby spaces and any other public amenities. See master response 25.

23 - 46

No additional new construction beyond the proposed 900,000 square feet in Alternative 5 is contemplated. Under all alternatives analyzed, the total square footage for the entire 60-acre Letterman Complex would not exceed 1.3 million square feet. Any proposal for future additional space would be subject to further environmental analysis.

23 - 47

This is not a NEPA issue.

23 - 48

Please refer to master response 9B and response to comment 23-39.

23 - 49

For response to the comment, refer to master response 9B and response to comment 23-39.

23 - 50

For response to the comment concerning the precedential effect of the proposed action, refer to master response 8. In addition, for future projects at the Presidio, the Trust would continue to use the GMPA and its General Objectives as foundations for planning decisions. Refer also to master responses 2A and 9B.

23 - 51

The commentor is referred to Section CC, Growth-Inducing Impacts in Appendix A of the EIS for this analysis.

23 - 52

The Presidio Trust assumes the commentor is referring to the Presidio Trust's June 14, 1999 announcement identifying the Digital Arts Center as the preferred alternative in the Draft EIS. Please refer to Section 2.1.3 of the Final EIS.

23 - 53

Letters submitted by community and planning groups to the Presidio Trust in support of the preferred alternative or other alternatives have been made a part of the administrative record and are available for review at the Presidio Trust library.

23 - 54

Refer to response to comment 23-39. Also, please see master response 9B.

23 - 55

Please refer to master response 6A and Section 2.2 of the Final EIS. Also see Section 1.2.2 of the Final EIS. Section 4.1, Environmental Consequences: Alternative 1, discusses the impacts of rehabilitating and reusing the LAMC and LAIR buildings. The impacts of demolishing these buildings are discussed in Sections 4.2.2, Solid Waste, and elsewhere within the EIS.

23 - 56

Please refer to master response 6A and Section 2.2, Alternatives Considered but Rejected, and specifically, Section 2.2.3, Remove LAMC and LAIR Buildings and Restore to Natural Conditions, for a discussion of impacts related to demolishing the LAMC and LAIR and returning the land to open space. Alternatives 1 through 5 would all include a buffer to minimize impacts on the surrounding neighborhood. Also, see master response 17, Impact on Quality of Life of Neighbors.

23 - 57

For response to comment concerning opportunities for public hearings on the Letterman project, refer to master responses 1E and 9B, and Section 5.1 of the Final EIS.

23 - 58

The Trust disagrees with the commentor, and believes that the public has had opportunities for meaningful participation. For further response to the comment, refer to master responses 1E and 9B, and Section 5.1 of the Final EIS.

23 - 59

The commentor is referred to the definition of “sustainability” contained in the Glossary of the EIS. Further explanation of environmental sustainability is contained in Section 1.4.9 of the Final EIS as well as within Sections 2.3.6 through 2.8.6 (Environmentally Sustainable Practices). The term “economically sustainable” is identified in one of the Presidio Trust’s General Objectives of the GMPA (Section 1.1.5), is embraced in the goals of the Financial Management Program (Appendix E of the EIS), and is further defined as economic self-sufficiency.

23 - 60

The Presidio Trust Act authorizes the Board to establish procedures for providing public information and opportunities for public comment regarding policy, planning, and design issues through the GGNRA Advisory Commission. By Resolution 98-16, the Presidio Trust Board of Directors formalized the role of the Advisory Commission as a body to hear public comment on significant Presidio Trust land use issues. A member of the Presidio Trust Board of Directors also serves on the Advisory Commission, acting as a liaison. The Executive Director of the Presidio Trust and other Trust staff attend Advisory Commission meetings and report back to the Board of Directors.

The Presidio Trust hosted or participated in a total of 15 public meetings and workshops related to Letterman Complex planning, the RFQ/RFP process, and the EIS process through August 1999. In addition, Trust staff attended public meetings of neighborhood and civic groups to discuss and answer questions about the Letterman project. The Presidio Trust attended at least 60 outreach sessions in 1998. These covered a variety of subjects in addition to the proposed Letterman project. The information requested by the commentor is available for review at the Presidio Trust Library (filed as the Letterman Public Outreach list). See master response 1E.

23 - 61 THROUGH 23 - 64

These comments do not address issues related to the NEPA analysis. The comments are noted for the record and will be considered by the Presidio Trust in its deliberations.

23 - 65

The Presidio Trust would own, operate, and maintain these services within the Presidio. The Presidio Trust’s goal is to connect all users, including those at the Letterman Complex, to its water, wastewater (currently in the planning stage), and stormwater systems. This would decrease the historic demand for these services from the city. However, it is likely that emergency connections between the city and Presidio systems would be maintained. The commentor is referred to the separate discussions in Section 4 (Water Supply) in the main body and Section G (City Services) in Appendix A of the Draft EIS, and the Impacts on City Services section on pages 168 through 172 of the GMPA EIS for additional discussion of this issue.

23 - 66

This comment does not address issues related to the NEPA analysis. The city of San Francisco is required by law to provide certain public services. Please see the response to comment 23-31.



23 - 67 AND 23 - 68

Refer to master response 21.

23 - 69

This comment does not address issues related to the NEPA analysis. The Letterman developer would pay fees and taxes that it is obligated to pay. Please see the response to comment 23-31.

23 - 70

Refer to master response 24.

23 - 71

The Final General Management Plan Amendment in its entirety is available in the Presidio Trust Library.

23 - 72

The commentor is referred to Table 11, Summary of Environmental Consequences in the Final EIS.

23 - 73

It is not known whether a similar action has been undertaken in another national park unit. Refer to master response 8.

23 - 74

See the response to comment 23-73.

23 - 75

The Planning Guidelines were prepared cooperatively by the Presidio Trust, NPS staff, and the consulting firm Simon Martin-Vegue Winkelstein Moris.

23 - 76

The Planning Guidelines were reviewed by the Presidio Trust Board prior to circulating the Draft EIS and identifying the preferred alternative. The Record of Decision following publication of the Final EIS would constitute approval of the Planning Guidelines when they are adopted as part of the agency's decision. They would also be included in the consultation package referenced in the Programmatic Agreement (Appendix F).

23 - 77

The Planning Guidelines were first introduced at the January 27, 1999 public scoping session for the project, and were included in the Draft EIS for public review and comment. Please refer to Section 1.4 of the Final EIS for a more complete discussion of the relationship of Planning and Design Guidelines to the Letterman project.

23 - 78

Please see the response to comment 23-3.

23 - 79

A Digital Arts Center would use 23 acres, or 1.5 percent, of the 1,480-acre Presidio. Of the 23 acres, the buildings would be concentrated on 8 acres so that 15 acres would remain as open space, including a 7-acre Great Lawn for public use and enjoyment. See master response 25 with regard to public access. The tenant organizations within the 23-acre site would be within a larger diverse community of other residential and non-

residential tenants. The Presidio Trust does not agree that this constitutes “takeover of a large part of a national park.” The Presidio Trust Act does not require the Presidio Trust to consider for-profit or non-profit status as a basis for tenant selection. Also see master response 1A. Please also refer to Sections 1.1 and 1.2 of the Final EIS for a discussion of the purpose and need for this Letterman project

23 - 80

See the response to comment 23-79.

23 - 81

The Presidio Trust disagrees with the commentor’s premise that public resources are being exploited by private interests seeking private profit. The Presidio Trust Act requires the Presidio Trust to lease properties at the Presidio in order to generate revenues to preserve the Presidio as a part of the national park system. The tenant of the 23-acre site would pay fair market value for the use of the site. Refer to Sections 1.1 and 1.2 of the Final EIS for more complete discussion.

23 - 82

See the response to comment 23-79.

23 - 83

See the response to comment 23-81.

23 - 84

See master response 1A and Sections 1.1 and 1.2 of the Final EIS.

23 - 85

The commentor’s dismay with the Presidio Trust and its enabling legislation, and concerns about the Presidio are noted for the record.

Letter 24

-----Original Message-----

From: SmallSally@aol.com [mailto:SmallSally@aol.com]

Sent: Thursday, July 29, 1999 11:24 PM

To: presidio@presidiotrust.gov

Subject: Letterman site

Dear the Presidio Trust,

I heard this evening from the National Parks and Conservation Association, that while the decision has been made to go with the Lucasfilm plan for the Letterman site, this decision has been made before the official end of the NEPA public comment period has closed. While I understand the fiscal imperatives of getting Presidio sites leased out, I am concerned to hear that legally mandated processes are being short-circuited. I am also concerned that such a strong supporter of the National Parks is concerned about the Trust's decision for how to develop the Letterman site. Something seems quite wrong if the Trust is at odds with the NCPA, and so early in the Trust's tenure, it causes me to worry about the Trust's future!

24-1

Since the public comment period on the Letterman site is still officially still open, I'd like to take this opportunity to register my concern about the Lucasfilm plan as well. My concerns are several-fold: If anything happens to Lucasfilms, such that they are not able to continue as a tenant, the Trust will be left holding a large chunk of real estate to re-lease, and some of that space will undoubtedly be rather specialized in configuration and not readily leasible without significant modification. On the other hand, a multiple-tenant scheme, even if something happens to the prime developer, has smaller parcels of general office space that would be much easier to re-configure and re-lease quickly. The Presidio is a National Park site, and a multi-use scheme allows for more public use and interation with the Presidio, while the Lucasfilm use would be essentially closed to anyone but employees. I understand one probable tenant of the multi-use scheme was the Sutro Library. I am a user of the Sutro Library, and would love to see it located in the Presidio! I also do not see how Lucasfilm furthers the sustainability and social goals of the NPS master plan and of the Trust. The multi-use plan, however, has a number of tenants that have educational and other goals that align quite nicely with NPS and Trust goals.

24-2

Sites such as Fort Scott, which, due do its location, is much less accessible to the public, seems much more suitable for "closed" uses such as Lucasfilm. The much more easily accessible site of Letterman is better utilized by more public-oriented uses.

24-3



I know the neighbors surrounding Letterman would prefer the quieter, more-or-less-just-in-the-weekday-daytime use of Lucasfilm, rather than a higher volume, daily use that a community college with evening classes, and other more public uses would generate. However, the Presidio is a National Park, not a neighborhood park, and I strongly feel the uses the site is put to should reflect broad social uses, and not just the use by a select well-off few.

24-4

Also, it doesn't sound as if the Trust has attempted to find other alternatives to solve these concerns. They seem stuck in a take-it-or-leave-it approach to dealing with potential developers. While I know the Trust would like to deal with a single developer for the site and/or a developer needs to have the whole site to make such a development viable from their end, there still seems like there should be more room for negotiation with the potential developers to resolve the various concerns that have been raised.

24-5

I hope the Trust will consider my views above during this public comment period, and I especially hope the Trust complies with all NEPA and other legally-mandated public review and comment processes. My hope for this is not just for the sake of following procedure, but also out of concern for possible - perhaps long and costly - challenges that could be raised if proper procedures aren't followed. The Trust has a great challenge in making the Presidio fiscally self-sustaining and it doesn't need any additional obstacles. I also hope the Trust can conduct its business in a way that keep the public well informed and maintains good working relationships with such groups as the NPCA. The Trust doesn't need to alienate anyone.

24-6

I lived on the Presidio for a year, a few years ago, and I have very special feeling for the Presidio. I would like to have more reasons to come back to the Presidio, but I doubt I will be visiting Lucasfilm for any reason in the future. On the other hand, I would definitely come to visit the Sutro Library, and might have dealings with other possible tenants in the multi-use scheme. I would think money being spent in the eateries and such that would be part of a multi-use scheme should also figure into the financial sustainability of the Presidio, while, again, the Lucasfilm use would be a rather closed use.

Sincerely,
Sally Small
San Francisco resident



Responses to Comments in Letter 24

2 4 - 1

For response to the comment concerning the apparent selection decision during the public comment period, refer to master response 6B.

2 4 - 2

The majority of buildings proposed under the preferred alternative are office use, which is a readily adapted floorplate for other users, should tenants change. All of the alternatives allow for public access within and around the buildings. As discussed in Section 2.7 (Alternative 5: Mixed-Use Development), the preferred alternative incorporates components of public access through the creation of a 7-acre Great Lawn open to the public, retail amenities such as a coffee house and café, and access to lobby/reception spaces (consistent with other tenant occupancies on the Presidio).

With regard to the comment about furthering the Presidio's goals for sustainability, please refer to Section 2.7.6, Environmentally Sustainable Practices, which describes the preferred alternative's incorporation of sustainable design practices into the overall concept. Furthermore, the proposed project would be subject to Design Guidelines for the architecture and landscape, which would include adherence to the U.S. Green Building Council's Leadership in Environmentally Efficient Design Guidelines.

In response to the comment on social and educational goals in the preferred alternative, please refer to the response to comment 18-6.

2 4 - 3

Please refer to master response 25. The preferred alternative incorporates a variety of public amenities and allows for public access beyond what currently exists on the site. Please refer to master response 25 and Sections 1.1 (Background) and 1.2 (Purpose and Need) within the EIS with regard to the need for the proposed project at the 23-acre site.

2 4 - 4

Comment noted. The alternatives analyzed present a range of uses that could occur at the site and the preferred alternative incorporates a variety of educational and publicly accessible features within its design. See response to previous comments.

2 4 - 5

The Presidio Trust considered a number of alternatives to satisfy the goals of the project as discussed in Section 1.3 (Goals). However, for the reasons given in Section 2.2, each alternative was determined not to merit detailed analysis in the EIS. See Section 2.1 (Development of Alternatives) and Section 2.2 (Alternatives Considered but Rejected) for more complete response to the comment.

2 4 - 6

The Trust is taking all comments received into consideration. For response to comment concerning the Trust's compliance with applicable law and public participation process, refer to master responses 1A, 1B and 1E and response to comment 7-1.



Letter 25

-----Original Message-----

From: slrcnorwood@igc.org [mailto:slrcnorwood@igc.org]

Sent: Friday, July 30, 1999 12:22 AM

To: presidio@presidiotrust.gov; ssey@npca.org

Subject: Presidio Needs Your Help by August 2

Dear NEPA Compliance Coordinator,

I am an architect and planner, and the Executive Director of the Shared living resource Center, Inc.

and am committed to ecological designed and comprehensively planned sustainable development that takes into account all the factors that have been advanced by the NPCA

and other support groups. I am deeply concerned about how the Presidio Trust has overridden the trust people had placed to them for carrying out the earlier public input d mandates for sensitive, balanced, natural preservation, etc. Presidio management.

My earlier letter to the Presidio Trust protesting the Lucus choice still stands as my expression of support for a public review of the Presidio Trust process.

25-1

Open Memo to Organizations and Media Concerning the Presidio Letterman Site Development Plan 6-21-99

This copy of my letter to the Presidio Trust brings out some issues regarding the Presidio Trust development decision that I feel have not been brought out for public scrutiny. I want you to know why as a planner and architect I recommended that the Shorenstein/Interland proposal is the most economically, socially, and environmentally sustainable plan and will better benefit the local neighborhoods and regional community than will the Lucus plan. There may still be time to over ride the Lucus decision. If you have questions of feedback please call me: Ken Norwood AICP, Executive Director, Shared Living Resource Center, Inc. 510-548-6608, <slrcnorwood@igc.org> <www.sharedliving.org>

- Copy -

Mr. Jim Meadows, Executive Director, Presidio Trust
1999

June 1,

Building 34, Graham Street, P.O. Box 29052
Presidio of San Francisco, CA 94129
Plan

RE: Supporting "Presidio Village"

Dear Mr. Meadows and all the Presidio Trust Members



We are following up earlier SLRC statements regarding Presidio planning and development in which we supported an integration of socially, economically, and environmentally sustainable precepts and practices. From the time the Presidio was transferred to the National Park Service in 1989 and through to the Presidio Trust formation we have contributed commentary on the reuse of the Presidio, including historic preservation, human scale, social interaction, spatial openness, housing, pedestrian circulation, wild life protection, and compatible integration of existing and new plant life. The Presidio is a national and regional resource and must serve the broad public realm. We strongly recommend the "Presidio Village" proposal by Shorenstein/Interland group because it is more capable of embracing the above principles, and for the following reasons, including opposing comments about the Lucus plan.

25-2

1. The mixed-use composition of residential, office, and retail, will provide social, cultural, and economic diversity, as opposed to the monolithic single purpose Lucus plan that we are concerned will tend to create isolation and alienation from the adjacent Presidio uses, and users.

2. The village cluster layout contributes to a more intimate, pedestrian, and human scale that allows a sense of spatial openness to flow around and through the various clusters, as opposed to the Lucus plan which conveys a monolithic, monumental, regimented feeling creating the antithesis of a "Village."

25-3

3. The combination of larger and smaller open spaces, courts and pedestrian circulation corridors are more people friendly and offer accessible linkages to Presidio neighbors, but the Lucus proposal for a "great lawn" is not conducive to sociability, but rather appears to be intimidatingly large and more like the grounds of an "intensely private" medieval castle.

25-4

4. The auto traffic generating impact is somewhat better mitigated by the mixed use development plan which if properly leased to compatible users with interactive purposes could carry out the "Presidio Village" concept with more self-sufficiency, whereas the Lucus plan will generate more commute traffic from longer distances (existing employees), impact the local shortages, and very likely generate more trucking activity, day and night.

25-5

We are also greatly concerned about the traffic generating impact upon San Francisco's and the region's already saturated highway network by the inclusion of up to 1390 to 1500 parking spaces. Neither project proposal, nor the Presidio Trust in its mandate to become self-sustaining by 2013, have apparently included a traffic management plan that would drastically reduce parking and contribute towards a rail and bus program that could serve many other San Francisco neighborhoods, work centers, and popular attractions. This lacking by the Presidio Trust could be the achilles heel for reaching the 2013 goal. The voters could say that "environmental sustainability should take precedence over economic sustainability," (Gov. Davis). Although we support the Shorenstein plan we stress that auto dependency begets more gridlock. That serious flaw must be faced before allowing any Presidio development.

25-5

Ken Norwood AICP
Executive Director, Shared Living Resource Center, Inc.



Responses to Comments in Letter 25

2 5 - 1

Thank you for your letter. The commentor's preference for Alternative 4 (Live/Work Village) is noted for the record.

2 5 - 2

The Presidio Trust has relied upon the reuse plans of the GMPA as colored by the Trust Act requirements in proposing the Letterman project. See Sections 1.1 and 1.2 of the Final EIS. The preferred alternative includes a diversity of uses and a variety of publicly accessible amenities and spaces (please refer to master response 25). In addition, the site plan for the preferred alternative would be subject to a planning and design review process that would examine design refinements to ensure greater consistency with the Planning Guidelines as well as the future Design Guidelines (see mitigation measure CR-1). The Planning Guidelines set forth principles about land use and public access whose application would ensure against "isolation and alienation from adjacent Presidio uses." See master responses 7A and 7B with regard to the Planning Guidelines and future design review.

2 5 - 3

Comment noted. Please refer to response to comment 25-2. In addition, the preferred alternative provides a 7-acre lawn around which the buildings would be located. This lawn is a new public amenity to the site and would provide opportunities for pedestrian-level, human-scale interaction. In addition, final designs would comply with Planning Guidelines as well as the future Design Guidelines, which include several design principles related to scale, character, and patterns of development being compatible with existing development and providing public access.

2 5 - 4

Comment noted. The 7-acre lawn would be open to the public and would be accessible from a variety of directions. In addition, the break in the historic wall at Chestnut Street would allow for new pedestrian access to the site. The final design of the landscape as well as the architecture would be subject to review and consistency with both the Planning Guidelines, in Appendix B of the EIS, and Design Guidelines. Regarding concerns of sociability and the size of the grounds, see master response 25.

2 5 - 5

Based on discussions with the development team for the preferred alternative, the employee commuting profile is not expected to be different than that assumed for all alternatives in the EIS. Also, given the nature of a Digital Arts Center, very little truck traffic would be generated.

2 5 - 6

Refer to master response 19.

Letter 26

-----Original Message-----
From: K. Fitch [mailto:kfunlimited@hotmail.com]
Sent: Saturday, July 31, 1999 6:14 PM
To: planning@presidiotrust.gov
Cc: PRKSRUS@aol.com
Subject: Preferred Alternative, Notice of Identification

The Notice of Identification of the Preferred Alternative (which I have just received) is indeed correct in citing "public confusion regarding the continued viability of Alternatives 1, 2, 3, 4, and 6."

Indeed, had I not received this notice, I would not have known that there was still any serious consideration of ALL the alternatives at this time.

- The media, some volatile members of the public, and The Presidio POST (read the first paragraph of its account) have presented the situation somewhat differently.

If FULL comment on ALL the Alternatives is indeed desired by The Trust, it would be wise to extend the comment period further.

The current confusion is not beneficial for The Presidio Trust, The National Park Service, or The Preferred Alternative and its Potential Tenants.

Sincerely,

Ken Fitch
FPPL

NOTE: The considerable energy generated by the unique and special possibilities of The Preferred Alternative and its celebrity associations could also attract an unfortunate hostile backlash if the process is not fully accessible and thoughtfully presented.

26-1

26-2



Responses to Comments in Letter 26

2 6 - 1

Thank you for your message. The notice referred to in the comment was sent to 735 individuals and organizations on June 18, 1999. It is unclear why the commentor received the notice 43 days later. After consultation with the U.S. EPA, the Presidio Trust elected to extend the prescribed comment period until August 2, 1999. Both agencies concurred that a full 45-day extension would be sufficient to allay public confusion regarding the Trust's alternative selection process.

2 6 - 2

Comment noted.



Letter 27

-----Original Message-----

From: Sami Iwata [mailto:sami.iwata@awl.com]

Sent: Sunday, August 01, 1999 3:21 PM

To: planning@presidiotrust.gov

Subject: Letterman Complex EIS comments

August 1, 1999

NEPA Compliance Coordinator
Attn: Letterman Complex
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

Dear Presidio Trust Board Members:

I am writing to voice my concern over the large scale private development under consideration for the Letterman Complex. The draft EIS (DEIS) is completely inadequate, consistently omits key information, and is fundamentally misleading. The DEIS should be reissued with an additional time period for public comment and several public hearings held by the Presidio Trust itself. The Presidio Trust Board should stop meeting behind closed doors to discuss the Letterman development, the Presidio National Park belongs to all of us.

27-1

Here are my comments that I would like to see addressed by the Presidio Trust.

Compliance with NEPA

How has the Letterman DEIS followed all NEPA related regulations, NEPA legal mandates, and NEPA related case law? Can a detailed analysis about this be included in the draft EIS as an appendix?

27-2

Incompliance with Key Documents

How is the proposed project consistent with the:

- July 1994 Final General Management Plan Amendment for the Presidio National Park
- National Historic Landmark District
- 1916 Organic Act that established the national park system
- 1972 federal legislation that established the GGNRA

27-3



- 1996 Presidio Trust legislation?

27-3

There should be a detailed analysis completed that specifically addresses how the chosen project, currently LucasArts, will conform to the key documents listed. This is a significant omission from the current DEIS and should be included. The four "general objectives" listed on page six of the DEIS are clearly not derived from the above documents, and their fabrication to justify the private commercial development verges on the fraudulent. The DEIS states that "the general objectives of the GMPA are not precisely identified within the GMPA itself.." (page 6 DEIS), yet in the July 1994 Final General Management Plan Amendment for the Presidio National Park the Letterman site is designated as a "science and education center" that "will be devoted to issues of health, life, and earth sciences." This governing plan also states that Letterman "will be used to support research and actions to improve human and environmental health. Life and earth science programs will be explored to better understand and manage the interdependence of health and environment." In addition, Letterman "will be dedicated to scientific research and education focusing on issues of human health, including preventive medicine, nutrition, collaborative eastern/western medicine, and health concerns related to the environment." The proposed Lucas project is wildly inconsistent with these very clearly stated objectives. This inconsistency should have been addressed in the DEIS.

27-4

The creation of the fictitious "general objectives of the GMPA" on page 6 of the DEIS were invented by the Presidio Trust with no legal mandate, no environmental review under NEPA, no public hearings or comments, and without changing the legally-binding and final GMPA. The sections of the July 1994 Final General Management Plan Amendment for the Presidio National Park that relate to the Letterman site should be included in the DEIS.

27-5

And does the Presidio Trust intend to follow any parts of the governing documents listed above, other than to focus on making money to ostensibly reach an operating budget whose calculation was done behind closed doors and has not been revealed to the public? The flagrant disregard for the public interest is starkly revealed by this and subsequent actions by the Presidio Trust discussed below.

27-6

Size of Project

The July 1994 Final General Management Plan Amendment for the Presidio National Park clearly limits park-wide new construction to a total of 665,000 square feet. The proposed project totals 1.49 million gross square feet of new construction, that is, over two times higher than the legally-binding limit, and also exceeds the 1.3 million maximum allowable square footage for the Letterman district. Why will the proposed project exceed these clearly stated limits of the governing GMPA? How is that

27-7



allowable?

27-7

Giveaways

Why does the DEIS not include information on the city, county and state tax breaks, rent breaks, tax credits, and other government giveaways involved in the proposed project? This should be included. Also the DEIS needs to list all public subsidies involved in the project, as well as the costs to the City and County of San Francisco to deliver public services to the development project. These glaring omissions are misleading to the public, who is not aware of the subsidies they will be giving to private interests.

27-8

Conflicts of Interest

Given that the Presidio Trust has been making decisions for the public, in lieu of a democratic procedure, it is only reasonable that they should disclose conflicts of interest with all the proposed alternatives, and in particular with Lucas, the final selection. What are the conflicts that exist, if they exist, for each Presidio Trust Board member? How have these been disclosed? This includes the professional, personal, and social connections between the Presidio Trust Board members and the proposed alternatives and Lucas? What lobbying occurred during the selection process?

27-9

Process

Why hasn't the Presidio Trust Board held its own public meetings on the DEIS?

Please identify the 110 public outreach sessions held in 1998, as stated by Jim Meadows. What were the subjects, the attendees, how many were affiliated with the proposed alternatives and not related to the projects themselves or to the Presidio Trust itself?

27-10

In closing, the DEIS should be reissued with an additional time period for public comment and several public hearings held by the Presidio Trust itself. I oppose the proposed preferred alternative for all the reasons stated above. The Presidio Trust has violated the public trust and sold out the Presidio National Park to private developers. The fundamental flaw in this action is clearly reflected in the convolutions of their DEIS that must continually mask, omit, and falsify information to attempt to justify what they have done.

Sincerely,

Valerie S. Iwata
531 2nd Avenue
San Francisco, CA 94118



Responses to Comments in Letter 27

27 - 1

For response to comments concerning opportunities for public involvement, refer to master response 1E, and with particularity to the Trust Board, master response 9B. See also Section 5.1 of the Final EIS.

27 - 2

Master responses 1B and 1D provide a detailed analysis of how the Trust is complying with NEPA. This will not be included as an appendix as requested.

27 - 3

Master responses 1D and 2A address the question of conformity with the GMPA. Master responses 1A and 1C address the Trust's conformity with applicable statutes.

27 - 4

Master response 2A addresses the Digital Arts Center's conformance with the GMPA. This is also addressed in Section 4.5.1.2 of the EIS. Development of the General Objectives of the GMPA is addressed in master response 3A.

27 - 5

A full discussion of the General Objective of the GMPA can be found in master responses 3A - 3C and in Section 1.1.7 of the Final EIS.

27 - 6

The Presidio Trust follows the specific requirements of the Presidio Trust Act and all other applicable laws, including NEPA and the National Historic Preservation Act. Section 104(a) of the Presidio Trust Act states that the Presidio Trust shall manage the leasing, maintenance, rehabilitation, repair and improvement of property within the Presidio under its administrative jurisdiction using the authorities provided in Section 104, exercised in accordance with the purposes of the 1972 Act that established the GGNRA, and in accordance with the general objectives of the GMPA. Please refer to Sections 1.1 and 1.2 of the Final EIS and master responses 5 and 10A and 10B for a complete response to the comment.

27 - 7

The proposed project would not exceed the square footage cap of 1.3 million. The preferred alternative calls for replacement construction of up to 900,000 square feet, with building demolition identified in the EIS to ensure the 1.3-million-square-foot cap at completion of construction. Master response 11 provides information on how the total square footage for this project was derived.

27 - 8

Please refer to response to comment 23-31.

27 - 9

Refer to master responses 9A and 9B.

27 - 10

Refer to the response to comment 23-60 and master response 1E. See also Section 5.1 of the Final EIS.

Letter 28

August 2, 1999

The Executive Director
Presidio Trust
Building 34
San Francisco, CA 94129

Attention: Mr James Meadows

Ref: Comments on the Letterman Complex as proposed by The Presidio Trust.

Dear Mr Meadows:

I am one of the very few who has served the Presidio of San Francisco to the best of my ability. Working for the Sixth U.S. Army and Presidio of San Francisco as their last Congressional Liaison, the Infrastructure Group under Charles Swanson, the Maintenance Technical Support, the Real Estate and Property Management, and now for the U.S. Park Police. I am as qualified as anyone of the experts to comment on the proposed Letterman Complex.

Further, I have attended most of the meetings called by the Presidio Alliance and other meetings called by neighboring community groups to discuss and evaluate the new developments and uses with the Letterman Complex as proposed by The Presidio Trust. Attending the Restoration Advisory Board meetings have given me further insight into certain factors that are linked with the Letterman Complex.

My subjective judgement is that the proposed changes do not meet certain federal mandated laws and regulations and especially the National Environmental Policy Act (NEPA). Further more the final proposed plan does not even remotely meet the basic requirements set by the final General Management Plan (GMP) and the final Environmental Impact Study (EIS). The Trust Bill and Congress mandates that the GMP and the EIS be used as guidelines.

I have stated the above facts at several public meetings. At most of these meetings staff from The Trust and members making the final list to lease of the Letterman facilities have been present.

28-1



Missing from the current Letterman process is the deliberative process which was followed by the GMP and the EIS. These two documents were documented after wide deliberative discussions involving the public and experts over a long period of time and covering the extended Bay Area. 28-2

The GMP and the EIS has no place for and does not factor a complex as large and having very little linked to the vision of the final GMP and the EIS as does the proposed complex that will substitute the present Letterman Complex. The Presidio Trust, for reasons best known to them have chosen to set abnormal standards that will come to haunt them in the long run. 28-3

It baffles me that no proper and detail analysis is shown linked to sewage, drainage, abatement and cleanup, water supply, traffic and transportation, emergency medical services and 911, natural habitat of species home to the Letterman complex, earthquakes, employment and diversity, archeological surveys and related issues, housing to name a few. 28-4

The Fire Department and the U.S. Park Police are entities that now serve the Presidio of San Francisco. The Letterman document does not address these two departments in a meaningful manner. 28-5

The Trust has chosen to follow a path that is detrimental to the deliberative process in the present circumstances. The Presidio of San Francisco and the Golden Gate National Recreation Area belongs to the people. As such each citizen if fully qualified to participate in the deliberative process. The Presidio Trust is mandated to follow certain laws and set certain standards to permit a open and sincere deliberative process. In the case of the proposed Letterman Complex the amended Letterman EIS and other related documents have chosen a hidden agenda and diverted the public from participating in an open deliberative process that is truthful. 28-6

It is not sufficient to have meetings and prepare an agenda that does not do justice to the deliberative process, especially when the input from the public is an essential component to the end result.



In conclusion , I state that the current Letterman Complex plan does not meet the basic requirements as clearly laid down in the final General Management Plan and the final Environmental Impact Study. The Presidio Trust has opted to choose a strategy that has fed the public with elements that favor a hidden agenda. Key elements such as sewage, earthquakes, traffic, archeological factors, natural habitats, were left out on purpose to the detrimental of this plan.

28-7

Francisco Da Costa
Muwekma Ohlone Tribe
Spokesman, Presidio Issues



Responses to Comments in Letter 28

2 8 - 1

Thank you for your letter. The Presidio Trust welcomes all comments on the Letterman Complex and other proposals in the Presidio and does not distinguish letters received on the basis of the commentor's qualifications or expertise. The Presidio Trust is pleased that the commentor is an active participant in meetings and discussions in connection with the Letterman Complex planning process. However, the Presidio Trust disagrees with the commentor that it has not fulfilled its existing authority and mandate under the NEPA, or the "requirements" established by the GMPA and the Presidio Trust Act. Please refer to master responses 1A, 1B, and 1D. Please also refer to master response 2A and Sections 1.1 and 1.2 of the Final EIS.

2 8 - 2

For response to comments concerning a preference for the GMPA public review process and adequacy of the Trust's public participation process for the Draft EIS, refer to master responses 1E and 1F. See also Section 5.1 of the Final EIS.

2 8 - 3

Alternative 1, which closely reflects the GMPA vision for the site, allowed for the demolition of the former hospital and replacement construction of up to 503,000 square feet. Alternatives 2 through 5 assume additional building demolition (primarily the LAIR facility) with a total replacement construction of up to 900,000 square feet. Because this is a departure from the GMPA and EIS of 1994, this EIS has been prepared to analyze the impacts of the new alternatives currently under consideration. Please refer to Sections 1.1 (Background) and 2.2 (Purpose and Need), the Consistency with Approved Plans and Policies discussions under each alternative in Section 4 (Environmental Consequences) and Appendix A (Revised Environmental Screening Form) for a further explanation about the relationship between the 1994 GMPA and EIS and this document. Also, refer to master responses 1D and 2A.

2 8 - 4

Each of the elements noted correspond to sections and analysis within the Final EIS and the record as a whole which openly disclose impacts, if any.

2 8 - 5

The Presidio Trust disagrees with the commentor's statement. The impacts on the U.S. Park Police and the Presidio Fire Department are adequately analyzed in Sections G.6 (Law Enforcement Services) and G.7 (Fire Protection Services) in Appendix A of the EIS. At the request of the Presidio Trust, both departments made staff support available and participated early in the NEPA process (see Section 5.5.3, Persons Consulted) and provided guidance, information and assistance in preparing the two sections to ensure that its views were adequately reflected in the EIS. Following its review of the Draft EIS, the two departments had no further comment.

2 8 - 6

Please refer to master response 1E and Section 5.1 of the Final EIS.



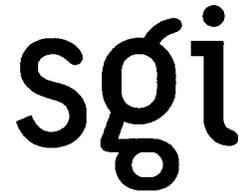
LETTER 28

28 - 7

The commentor's conclusions are not supported by evidence in the record.



Letter 29



July 30, 1999

John Pelka
NEPA Coordinator
Attn: Letterman Complex
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052



Dear Mr. Pelka::

SGI
1600 Amphitheatre Pkwy.
Mountain View,
CA 94043-1389

SGI strongly supports the Letterman Digital Center as a tenant for the Presidio. I understand the objectives of the Presidio are to encourage uses that involve community service, the arts, education, research and innovation. I can think of few other organizations that meet these criteria as completely as the Lucas Companies.

Richard E. Belluzzo
Chairman
Chief Executive Officer

SGI is the world leader in high performance computing technology dedicated to unleashing the power of human creativity. As such, we can attest to the fact that Industrial Light and Magic (ILM) and the other Lucas companies are pioneers in developing digital technology.

Tel 650.933.7000
Fax 650.932.0203

ILM has developed the prototypes for digital tools that today are standard in the industry: the motion control camera, EditDroid, SoundDroid, the digital film printer, computerized electronic nonlinear editing, a morphing computer graphics program for the fluid onscreen transformation of one object to another, computer graphics, computer generated characters and digital compositing, among others.

29-1

New techniques and tools continue to be developed such as animatic techniques [video storyboards]; real-time facial animation and motion capture systems; Viewpaint 3D Paint System allowing artists to color and texture details to computer-generated effects; motion-controlled silent dollies for camera work; and new software that creates digital fabric, hair, skin and natural phenomena such as water and reflections for digital image development.



July 30, 1999
Page 2

The Lucas Companies emphasize research and development as a primary business goal. LucasArts Entertainment Company has developed new technology that has expanded the frontier in the computer games industry. The THX Group has raised the standard for sound in movie theaters and in-home sound systems with its innovative research and development program. By designing open-ended experiences that put the tools in the hands of the user, Lucas Learning has been able to address successfully the needs of students with diverse backgrounds and varied learning styles.

29-1

The Lucas Companies' success is directly related to their emphasis on research, education, the cinema arts, innovation and community service – the same ideals and goals as espoused by the Presidio Trust. The Lucas Companies are unique in that they have a business mission beyond providing goods and services to the marketplace. SGI looks forward to working with the Lucas Companies and Letterman Digital Arts at the Presidio.

Sincerely,



Richard E. Belluzzo
Chairman
Chief Executive Officer
SGI

REB:kjm



Response to Comment in Letter 29

29 - 1

Thank you for your letter. The organization's support of the Letterman Digital Center is noted for the record.



Letter 30

The Saul Zaentz Company

Psycho
One Flew Over The Cuckoo's Nest
Three Warriors
The Lord Of The Rings
Amadeus
The Mosquito Coast
The Unbearable Lightness Of Being
AI Play In The Fields Of The Lord
The English Patient

July 30, 1999

Via Fax: 415.561.5315

John Pelka
NEPA Coordinator
Attn: Letterman Complex
Presidio Trust
34 Graham St.
P.O. Box 29052
San Francisco, Calif. 94129- 0052

Der Mr. Pelka:

I am happy to write this letter in support of the Letterman Digital Arts' plans to develop the Letterman Digital Center at the Presidio. As an independent filmmaker in the Bay Area I can attest to the impact the Lucas companies have had on the advancement of the cinema arts.

As filmmakers we are all storytellers. The technological advances and pioneering innovations of companies like ILM and THX have put new tools into the hands of filmmakers which allow our imaginations to soar. With these new digital tools even schoolchildren can tell their stories and create their own destinies.

As an artistic achievement filmmaking is a uniquely collaborative effort. The Lucas companies have spawned a wealth of local talent. Many creative and innovative individuals that were hired and inspired by Lucas have gone on to establish their own companies benefitting all of us associated with the cinema arts.

Just as independence and a pioneering spirit have become synonymous with filmmaking in Northern California I look forward to the day when innovation and creativity will become synonymous with the Presidio.

Sincerely,

Saul Zaentz

Saul Zaentz

30-1



Response to Comment in Letter 30

3 0 - 1

Thank you for your letter. The organization's support of the Letterman Digital Center is noted for the record.

