

Letter 41

LETTERMAN DIGITAL ARTS LTD.

August 2, 1999

Sent Via Facsimile and U.S. Mail

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

RECEIVED
PRESIDIO TRUST REC'D
AUG 11 1999
S-14822

Re: Letterman Complex Draft Supplemental Environmental Impact Statement

Dear Coordinator:

Letterman Digital Arts Ltd. ("LDA") is honored that the Presidio Trust has chosen the LDA proposal at its preferred alternative for the redevelopment of the site of the former Letterman Hospital at the Presidio.

We have reviewed the Draft Supplemental Environmental Impact Statement ("EIS") and agree with the conclusion that the Letterman Digital Center will help fulfill the Trust's objectives for the Presidio. Together with the Trust and other Presidio tenants, LDA would create a center for research, learning and commercial activity that will exist harmoniously with nature and history.

In addition, we would like to submit the following minor comments on the draft EIS:

- Summary: p. vi: Alternative 5: Digital Arts Center

Comments: The summary description of the Digital Arts Center should reflect that the work of the proposed LDA tenants has applications beyond the entertainment industry. We suggest the following clarification (inserted text underlined): "This alternative would provide an office campus for several units of a single company engaged in research, development and production of digital arts and technologies related to the entertainment industry, education, communications, and other industries."

In addition, this description should make clear that the landscaped open space will be open to the public. We suggest the following clarification: "This alternative would devote a portion of the site to a landscaped open space designed for use by "the public, employees of the facility, and Park visitors, neighbors, and other Presidio tenants."

41-1



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- Alternatives: pp. 31, 2.5.1: Concept

Comment: Again, the description of the “Great Lawn” should reflect that the Digital Arts Center Alternative will include a public park. We suggest the following clarification: “A ‘Great Lawn’ or public park with a water element would be a significant site feature for Park visitors and Digital Arts Center employees.”

41-2

- Alternatives: pp. 31-32, 2.5.3: Activities and Program

Comment: LDA is pleased to advise that, in addition to the other tenants proposed in our original proposal, the George Lucas Educational Foundation would be a tenant of the Digital Arts Center. This section should reflect this non-profit educational foundation as a proposed tenant.

41-3

- Alternatives: p. 33, 2.5.4: Community and Support Services

Comment: This section should state that a public restroom, in addition to a public café and coffee bar, will be provided. This should also be noted in Table 1: Summary of Alternatives at p. 14.

41-4

- Alternatives: p. 33, 2.5.5: Access, Circulation and Parking

Comment: The first paragraph should state that the Digital Arts Center alternative will include 30 surface visitor parking spaces in addition to the 1500 car underground garage. This should also be noted in Table 1: Summary of Alternatives at p. 15.

41-5

- Mitigation Measures Included as Part of Alternatives 1 Through 5:

- pp. 35-36, 2.6.3: Water Supply and Distribution

Comments: LDA has the following comments on the proposed mitigation measures:

41-6

WS-1 (Fire Flows): We suggest the following clarification: “The selected development team would be required to implement one or more of the following actions: fix specific deficiencies in the on-site water distribution system . . .”



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WS-2 (Water Conservation Practices): We suggest the following clarifications:

First bullet: "Install water meters and develop marginal cost pricing incentives as long as base allotment is adequate."

41-7

Fifth bullet (p.36): "... , such as the anticipated use of reclaimed water from the city of San Francisco water system for Presidio irrigation purposes, from an on-site well, or by exchange underground water from other sources."

• pp. 36-37, 2.6.5: Traffic and Transportation Systems

Comments: LDA has the following comments on the proposed mitigation measures:

41-8

TR-1 (Lyon Street and Richardson Avenue and Gorgas Avenue Intersection Improvements): LDA will cooperate with the responsible agencies in planning these improvements.

TR-2 (Lombard Street - Lyon Street Intersection Improvements): The following language should be added as a final sentence to the language for this mitigation measure: "The development team's financial participation in this improvement, if any, would be based on a fair share basis, and on costs at the time of approval of a specific Letterman redevelopment project by the Trust, after review of preferred solutions for the traffic impacts to this particular intersection. The "fair share" would be based on the calculations set forth in the Final SEIS."

41-9

TR-3 (Lombard Street/Presidio Blvd Intersection Improvements): The following language should be added as a final sentence to the language for this mitigation measure: "The development team's financial participation in this improvement, if any, would be based on a fair share basis, and on costs at the time of approval of a specific Letterman redevelopment project by the Trust, after review of preferred solutions for the traffic impacts to this particular intersection. The "fair share" would be based on the calculations set forth in the Final SEIS."

41-10

TR-4 (Adjusting and Monitoring Parking): Adjustment of available parking would not be applicable to the Digital Arts Center alternative, because the parking is fixed and based on known uses.

41-11



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Page 4

- pp. 42-43, 2.6.14: Human Health, Safety and the Environment

Comments: LDA has the following comments on the proposed mitigation measures:

HH-1 (Asbestos Remediation): This mitigation measure should clarify that the party conducting the building demolition would be responsible for compliance with the applicable regulations. We suggest the following clarification (third line): “The development team party conducting the building demolition would be responsible for compliance with all”

41-12

HH-2 (Lead-Based Paint Abatement): This mitigation measure does not indicate a party responsible for the abatement. We suggest the following clarification: “Prior to initiating building demolition within the Letterman Complex, the party conducting the demolition would prepare, and ensure compliance with, a management and remediation plan for lead-based paint ~~would be prepared~~ to reduce impacts”

41-13

HH-3 (Contingency Plan): It appears that the contingency plan would apply to the whole 60 acre Letterman Complex. As such, the plan should be developed by the Presidio Trust. We suggest the following clarification: “Prior to initiating the initiation of subsurface construction within the Letterman Complex, the Presidio Trust would develop a Contingency Plan ~~would be developed~~ to provide”

41-14

- Table 9: Summary of Environmental Consequences: p. 80

Comment: The summary of the consistency of the Digital Arts Center with the GMPA should be corrected to refer to Alternative 5, rather than Alternative 4.

41-15

- Environmental Consequences, pp. 162-63, 4.5.1.2: Presidio General Management Plan Amendment

Comment: We believe that the following change better reflects the Digital Art Center’s consistency with the GMPA: “Alternative 5 would be consistent with the GMPA’s general objective to provide for appropriate uses of the Presidio. In particular, the inclusion of 1) companies developing cutting-edge technologies in the digital and interactive arts and sciences; 2) a company developing interactive educational software; 3) a non-profit foundation devoted to promoting innovative efforts to improve education; and 4) an internet-based tenant applying advanced digital arts and

41-16



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technologies to on-line communications, will be consistent with the objective to provide uses, particularly those that involve the arts, education, research, innovation, and communication.”

41-16

- Environmental Consequences, pp. 164-66, 4.5.7: Traffic and Transportation Systems

Comment: There appears to be arithmetic miscalculations of the traffic impacts at one specific location and of the parking demand for Alternative 5. More specific technical comments on these issues will be provided under separate cover from Fehr & Peers Associates, Inc.

41-17

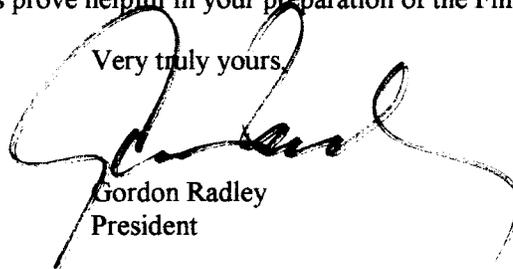
- Environmental Consequences: pp. 166-67, 4.5.8: Cultural Resources

Comment: LDA will work with the Trust to ensure that the design of the Digital Arts Center will be respectful of the Presidio's cultural and historical resources, while fulfilling LDA's operational needs.

41-18

We hope that these comments prove helpful in your preparation of the Final EIS.

Very truly yours,



Gordon Radley
President



Responses to Comments in Letter 41

4 1 - 1

Thank you for your letter. The text within the summary has been clarified to reflect the work of the proposed tenants at the digital arts center and the availability of open space to the public.

4 1 - 2

The text has been revised to reflect the public nature of the park.

4 1 - 3

The text has been modified to include a non-profit educational foundation to the list of proposed tenants.

4 1 - 4

The text and Table 1 have been revised to include a public restroom to the list of community and support services.

4 1 - 5

In response to the comment, the 30 surface parking spaces have been acknowledged and have been added to Section 2.5.5 and Table 1.

4 1 - 6

The text has been modified to as suggested to clarify the selected development team’s responsibility to address onsite deficiencies to the water distribution system.

4 1 - 7

First bullet – The text has been modified to “develop marginal cost pricing incentives *for use of water beyond projected use allocations.*”

Fifth bullet – The text has been modified to include the recommended additional water supply sources subject to additional analysis and agency review.

4 1 - 8

Comment noted.

4 1 - 9 AND 4 1 - 10

Financial participation in these improvements would be determined in the Letterman Complex Development Agreement between the Presidio Trust and the selected development team. The text has not been amended as recommended by the commentor.

4 1 - 1 1

Refer to master response 20.

4 1 - 1 2

The text has been revised to clarify who would be responsible for compliance with the applicable asbestos regulations.

4 1 - 1 3

The text has been revised to indicate who would be responsible for lead-based paint abatement.

4 1 - 1 4

The commentor is correct in suggesting that the contingency plan would apply to the 60-acre Letterman Complex (as well as to the rest of the Presidio). The text has been revised to reflect who would be responsible for development of the plan.

L E T T E R 4 1

4 1 - 1 5

The text has been revised to correct the typographical error.

4 1 - 1 6

The text has been modified to address in greater detail how Alternative 5 would be consistent with the general objectives of the GMPA.

4 1 - 1 7

See master response 20 regarding parking. Revisions to parking numbers were made in the appropriate tables in Appendix D.

4 1 - 1 8

Comment noted. No response is necessary.



Letter 42

San Francisco Film Centre
39 Keyes Blvd
The Presidio
San Francisco, CA 94129

August 2, 1999

Mr. John Pelka
NEPA Coordinator
ATTN: Letterman Complex
Presidio Trust
34 Graham Street
San Francisco, CA 94129

Dear Mr. Pelka:

It is with pleasure that I write to strongly support the Letterman Digital Arts project at the Presidio.

My relationship with the Lucas companies goes back over twenty years when I worked as a licensee for a number of their films. When Mr. Lucas first moved here from Southern California I was impressed by his personal and professional commitment to the Bay area community. The Lucas companies have always set an exemplary community service standard.

As Skywalker Ranch was being built, I saw the respect and care that George Lucas has for the environment. I am confident that he will bring that same environmental stewardship to the Presidio.

When the Presidio was transferred from the military to the National Park Service I was Chief of Staff for then Assemblyman John Burton, who now serves as State Senate President. In that capacity I was involved in many aspects of the process and learned a great deal about the General Management Plan Amendment. I believe that the Letterman Digital Arts project goes a long way in fulfilling the requirements set forth in the GMPA for the Presidio to be used as a center for arts, education, research, communication, and global exchange.

Letterman Digital Arts, along with the San Francisco Film Centre and the Presidio Theatre, will create a unique community of film art and technology. The vision of the Lucas companies will enhance interaction in the Presidio community, provide environmental responsibility, and contribute to educational outreach. I am pleased to see that the Trust recognizes all of the benefits that come with this project.

Very truly yours,



Melanie Blum
Project Manager

42-1



Response to Comment in Letter 42

4 2 - 1

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



Letter 43

LINDA F. DAVIS
Interim Superintendent

San Francisco Unified School District
135 Van Ness Avenue, San Francisco, CA 94102



PRESIDIO TRUST REC'D

AUG 2 1999
P 2:47 dr

August 2, 1999

Letterman Complex
NEPA Compliance Coordinator
Presidio Trust
34 Graham Street
San Francisco, CA 94129-0052

Dear Coordinator:

The Letterman Digital Center, approved for development in the Presidio National Park, fulfills the goals set forth in the General Management plan to enhance the cultural and educational resources of the Presidio. The George Lucas Education Foundation, one of the tenants of the Letterman Digital Center, demonstrates the Lucas companies' commitment to excellence in education. The non-profit Foundation gathers and distributes information designed to improve public education and to involve the general public in helping the nation's schools.

To this end, the Foundation has created and distributed more than 27,000 copies of Live and Learn, a video and 300-page resource book, which promotes the kind of learning where all students are challenged and engaged, have access to interactive technologies, and are supported by inspired teachers, involved parents, and engaged communities.

The Foundation's work has been particularly useful in professional development, as universities, school districts, state departments of education and others use Live and Learn to prepare educators to teach in the "digital age".

The work of The George Lucas Educational Foundation portrays George Lucas' commitment to quality public education for all children.

43-1

Sincerely,

Linda Davis
Interim Superintendent



Response to Comment in Letter 43

4 3 - 1

Thank you for your letter. The San Francisco Unified School District's support of the Letterman Digital Center is noted for the record.



Letter 44

AS YOU SOW * ECOLOGY CENTER
GOLDEN GATE AUDUBON SOCIETY
NATIONAL TRUST FOR HISTORIC PRESERVATION
NATIONAL PARKS AND CONSERVATION ASSOCIATION
NATURAL RESOURCES DEFENSE COUNCIL
SAN FRANCISCO LEAGUE OF CONSERVATION VOTERS
SAN FRANCISCO TOMORROW
SAN FRANCISCO TREE COUNCIL * SIERRA CLUB
THE WILDERNESS SOCIETY

Via Messenger

August 2, 1999

The Presidio Trust
c/o James Meadows, Executive Director
34 Graham Street, The Presidio
San Francisco CA 94129

Dear Members of The Presidio Trust:

Attached are the comments of the above-listed groups on the Draft Environmental Impact Statement for New Development and Uses within the Letterman Complex. We thank you in advance for your careful consideration of our views.

Sincerely,



Brian Huse
Pacific Regional Director
National Parks and Conservation
Association



Johanna Wald, Director
Land Program
Natural Resources Defense Council

1999 AUG 2 0 3:18
PRESIDIO TRUST REC'D



COMMENTS OF

AS YOU SOW, ECOLOGY CENTER, GOLDEN GATE AUDUBON SOCIETY
NATIONAL TRUST FOR HISTORIC PRESERVATION,
NATIONAL PARKS AND CONSERVATION ASSOCIATION,
NATURAL RESOURCES DEFENSE COUNCIL,
SAN FRANCISCO LEAGUE OF CONSERVATION VOTERS,
SAN FRANCISCO TOMORROW, SIERRA CLUB and
THE WILDERNESS SOCIETY

on

The Presidio Trust's

DRAFT ENVIRONMENTAL IMPACT STATEMENT for
NEW DEVELOPMENT AND USES WITHIN THE LETTERMAN COMPLEX

August 2, 1999

Prepared by:

Courtney Damkroger
National Trust for Historic Preservation

Brian Huse
National Parks and Conservation Association

Joshua Rider
Johanna Wald
Natural Resources Defense Council



INTRODUCTION

These are the comments of the National Parks and Conservation Association (“NPCA”), National Trust for Historic Preservation (“NTHP”), Natural Resources Defense Council (“NRDC”), San Francisco League of Conservation Voters, Sierra Club, The Wilderness Society (“TWS”), Golden Gate Audubon Society, San Francisco Tomorrow, San Francisco Tree Council, Ecology Center, and As You Sow on the Draft Environmental Impact Statement for New Development and Uses within the Letterman Complex (hereafter “DEIS”). The national organizations submitting these comments – NPCA, NRDC, NTHP, Sierra Club and TWS – have an extensive history of involvement with national parks generally and with the Presidio. The first four of these organizations were instrumental in the passage of the Presidio Trust Act while the fifth is currently a tenant in the Thoreau Center.

The organizations submitting these comments are committed to protecting the natural, cultural and historic resources of the Presidio through effective planning, partnership and fiscal responsibility. Individually and collectively, they are mindful of the unique management structure of the Presidio and, in particular, of the Presidio Trust’s mandate for financial self-sufficiency. All of these organizations consider themselves friends of the Presidio. None of us want the Trust to fail and the unique place that is the Presidio lost. Nor do we want any of its nationally significant natural, cultural or historic values degraded or lost.

Our organizations also believe in and support the General Management Plan Amendment for the Presidio (hereafter “GMPA”), prepared by the National Park Service in 1994. We would be delighted if the Trust were, in fact, to carry out the vision embodied in that plan, although we recognize that its statutory mandate is merely to comply with the plan’s “general objectives.” (Presidio Trust Act §104(a) [Omnibus Parks and Public Lands Management Act of 1996, 16 U.S.C. §460bb note (1996)], hereafter “Trust Act.”) Nonetheless, we recognize that circumstances have changed since the GMPA was completed, and we acknowledge that the Trust may feel the need to depart in some instances from the GMPA’s specific provisions in connection with development of the Letterman Complex site as well as other land use decisions at the Presidio. Nevertheless, the Trust has provided no explanation for doing so other than its financial mandate, and in our minds, that reason, standing alone, is insufficient. This is particularly true when a complete financial plan has not been made public or included in the DEIS.

44-1

For these reasons and the problems noted below, this coalition of commenting groups believes that the Presidio Trust must supplement the DEIS before any development goes forward at the Letterman Complex site.

The Letterman decision has huge implications. Choices made here will set a precedent for all future planning decisions by the Trust. They will also determine, in large measure, how the public will be able to experience the park’s resources and resource values in the



future. How these choices are made is every bit as important as the choices themselves, as the histories of other, older federal agencies, including the National Park Service, amply reveal.

As much as we want the Trust to succeed, we believe that the process that has been followed to date has taken a wrong turn. The clearest and simplest illustration of our conclusion involves the Trust's "preferred alternative." The Trust's preferred alternative – the Digital Arts Center (or Lucasfilm project) – is the option that, when compared to the others considered by the Trust:

- brings the most employees to the Presidio¹;
- provides the least housing²;
- requires the second most parking under questionable assumptions³;
- has the fewest public amenities⁴;
- has the narrowest educational focus⁵;
- is the least compatible with the Trust's own published guidelines⁶; and
- is the least compatible with the GMPA⁷

44-1

A process which produces this choice is, to our way of thinking, seriously flawed.

The specific flaws in the process followed to date involve both the Trust legislation and the National Environmental Policy Act ("NEPA") (42 U.S.C. §§ 4332 *et seq.*). All of these flaws undoubtedly stem first from the mandate for self-sufficiency that the 104th Congress imposed on the Presidio and the Presidio Trust. This mandate, however, is no excuse for failure to plan carefully and in compliance with important requirements for public participation and environmental review. Indeed, we believe that achieving self-sufficiency will require full compliance with all applicable requirements *as well as* open communication, candor and collaboration between the Trust, the National Park Service and all those individuals and organizations dedicated to protecting this remarkable park.

It is in that spirit that these comments are submitted.

I. SUMMARY

Based on an extensive review of the DEIS, we have concluded that the Trust has failed to comply with mandatory requirements of both its own legislation and NEPA. It has not complied with the GMPA in selecting candidates to develop the Letterman Complex site or with the GMPA objectives. The Trust has not provided the public with its own vision for the Presidio and the "objectives" it has adopted by resolution are not those of the GMPA. In

44-2

¹ DEIS, p. 14. Unless otherwise indicated, all page references are to the DEIS.

² *Id.*

³ *Id.* at p. 15. For a discussion of these assumptions, see section VD2 below.

⁴ *Id.* at p. 14.

⁵ *Id.*

⁶ For a fuller discussion, see section IV below.

⁷ For a fuller discussion, see section III below.



addition, those objectives were not developed with any public participation in contradiction with the Trust’s affirmative responsibility under the Trust Act. In contrast to the “objectives” of the Trust, its *Draft Planning Guidelines for New Development and Uses within The Letterman Complex* (hereafter “*Guidelines*”) appear to be both substantively and procedurally sound: they further the GMPA vision far better than the “objectives” drafted by the Trust and, moreover, have been made available for public review and comment through inclusion in the DEIS – for which we commend the Trust. As indicated above, however, the preferred alternative falls far short of meeting the *Guidelines* and, although other alternatives come closer, none truly fit. As the result of this “mismatch” between the alternatives and the *Guidelines* as well as the Trust’s failure to provide a publicly-stated vision, the choice of alternatives and, in particular, the choice of the preferred alternative, appears arbitrary.⁸

44-2

The NEPA problems posed by the document include: the lack of a clear relationship between this DEIS and the EIS on the GMPA to which it is supposedly tiered; the omission of key information, in particular the Trust’s vision for the Park as a whole and its financial plan, as well as any discussion of the natural resources peculiar to the Letterman Complex site; an unduly truncated set of alternatives; an inadequate analysis of the direct impacts particularly in relation to visitor experience, the Park as a whole, parking, traffic, sewer, and water usage; the masking of impacts by reliance on nonmandatory mitigation plans and the *Guidelines*; and the failure of the cumulative impacts analysis to address the impacts of the Letterman Complex site development on the Park or the Golden Gate National Recreation Area (hereafter “GGNRA”) as a whole. Last but not least, the Trust’s actions with respect to selection of the preferred alternative and its decision to engage in “exclusive negotiations” with Lucasfilm have created – at best – the perception that NEPA’s overarching goals have been disregarded and, at worst, that its requirements have been violated.

44-3

For these reasons, as examined in greater detail below, we believe that the DEIS is fundamentally inadequate in meeting the important purposes for which it was intended and must, therefore, be revised. A supplemental document must be provided for further public review and should be accompanied by: (1) a comprehensive management program for the Presidio; (2) detailed financial information on which the choices made were based; and (3) an analysis of how each alternative satisfies the *Guidelines*.

44-4

II. THE TRUST ACT

We are mindful of the Trust’s obligations under the legislation that established the unique system for running the Presidio. The primary aspect of that legislation is, of course, the requirement of economic self-sufficiency. (Trust Act, § 105(b).) This requirement seems foremost in the minds of Trust board members and staff as they have repeatedly stressed the need to move quickly in order to meet their financial obligations. The Trust has also recognized the requirement that its actions conform to

44-5

⁸ As discussed below, the Trust’s apparent intention to revise its preferred alternative to meet the guidelines during the NEPA process is also problematic.



the “general objectives” of the GMPA (*id.*, §104(a)), although, as discussed below, we believe that this obligation is not being fulfilled.

Nevertheless, other obligations imposed by the Trust Act on the Trust seem to have been overlooked to date. One such obligation is the requirement for public comment and participation. Section 103(c)(6) of the Trust Act reads in part: “The Board shall establish procedures for providing public information and opportunities for public comment regarding policy, planning, and design issues.” Yet the Trust has established the “general objectives” of the GMPA which are to bind it -- surely a policy decision -- with *no* opportunity for public input. Given that these are the only parts of the GMPA to which the Trust is bound by law, it is most important that the Trust both inform the public about and provide an opportunity for public participation in the process that defines these “general objectives.”

44-5

Further, there is an obligation in the law for the Trust to adopt an overall plan that reflects its vision for the Park and its road to fulfilling the obligation of self-sufficiency. Section 104 of the Trust Act states: “The Trust shall develop a *comprehensive program* for management of those lands and facilities within the Presidio which are transferred to the administrative jurisdiction of the Trust.” (Emphasis added). Surely, the adoption of such a program would constitute a major planning decision, yet the public remains uninformed as to whether the Trust has in fact adopted a comprehensive program. Nor has the opportunity been afforded to comment on any potential program under consideration. This is both a procedural and a substantive problem: the Trust must adopt such a plan and, in doing so, it must allow for public comment. Moreover, it seems clear that development of this comprehensive program should have preceded the initiation of decisionmaking for this major development proposal. Indeed, the lack of this program has major ramifications in the current decision process, particularly in that without it the public has no context for evaluating the various alternatives put forward for development of the Letterman Complex site.⁹

III. THE GMPA

The Presidio of San Francisco, one of America's great cultural and natural treasures, will soon be transformed from a military post into a national park unlike any other. It will pioneer a new role for a national park by creating a global center dedicated to addressing the world's most critical environmental, social, and cultural challenges.

44-6

The Presidio's new role symbolizes the swords-into-plowshares concept. At this site of incomparable beauty and history, we can link our military past with a future full of promise and possibility. The transformation is inspired by a newly emerging definition of protection – the one that recognizes that security is no longer based solely on political and military strength, but on stewardship of the world's human and physical resources through global cooperation.

⁹ In addition, the absence of such a program raises the possibility of improper segmentation under NEPA. (See *e.g.*, 40 C.F.R. 1502.20, 1508.28.)



Long the guardian of the Golden Gate, the Presidio now stands ready to house a network of national and international organizations devoted to improving human and natural environments and addressing our common future. The site will be used as a working laboratory to create models of environmental sustainability that can be transferred to communities worldwide. Its inspirational setting will provide a respite for reflection and personal renewal. (Final General Management Plan Amendment – Presidio of San Francisco p.v.)

These three paragraphs capture the result of a remarkable process that began in 1972 when Congressman Philip Burton had the foresight to envision a time when the Presidio would no longer be needed as a military base. Identified as surplus to the Army's needs in the Base Realignment and Closure Act (10 U.S.C. § 2687), the Presidio's future was already provided for under the legislation that created the GGNRA. (Act of October 27, 1972, 16 U.S.C. § 460bb (1994).) With the Presidio poised to become part of the GGNRA, the National Park Service, working closely with the public, local, state and national organizations, and the Congress, developed a comprehensive plan for the site. This document, the GMPA, set forth a bold vision for a new kind of park – “a global center dedicated to addressing the world's most critical environmental, social, and cultural challenges.” (GMPA, p. v.) Our organizations fully support this plan and its vision for the park.

44-6

The plan is noteworthy for a number of reasons. First, the planning process was both inclusive and comprehensive. The public, interested organizations, government agencies and elected officials all participated in developing the guidelines, the vision, and several draft alternatives, all integral to forming the final document. (See, GMPA Appendix C: Public Involvement Summary, p. 124.) Second, the plan was built on a strong foundation that recognized the importance of maintaining the standards and values of the National Park System. Finally, and due in large part to the above, the plan's vision relies on the significant resources of the park to create an even higher park purpose that remains in keeping with national park standards.

A. The Vision of the GMPA

A universally shared vision is the essence of strategic planning and the foundation upon which a comprehensive plan is based. Not only does a clear vision allow planning to proceed in an integrated fashion, it also establishes a benchmark against which all decisions can be validated. That is, if an action does not contribute to the fulfillment of the vision, it must be viewed with skepticism and trigger further work to define an outcome more in keeping with the plan.

44-7

It is in this aspect of planning that the GMPA excels. Within the first 20 pages of the document can be found no less than ten specific references to the publicly supported vision of the Presidio as a sustainable community dedicated to understanding and solving critical environmental, social, and cultural challenges. This vision establishes the context for the



entire plan. Every proposed action, every planning concept, and each step of the implementation plan is filtered and refined by it.

44-7

B. Objectives Supporting the Vision of the GMPA

Just as the GMPA establishes a clear vision, it is also careful to define the overall objectives that, if achieved, will assure the fulfillment of the vision. Early in the document, these broad objectives are set forth:

- “The Presidio will be a dynamic setting for a network of institutions devoted to stimulating understanding of and action on the world’s most critical social, cultural and environmental problems.
- “The Presidio will be home to an exciting array of visitor activities. Programs will inspire visitors to learn about the Presidio’s military history, the diversity of peoples who have lived here, and its significant resources.
- “The Presidio’s unparalleled collection of military architectural treasures and cultural landscapes will be preserved and enhanced. Its spectacular natural and recreational features will be perpetuated.
- “An environmentally responsible transportation strategy will be implemented to minimize private automobile use and increase the availability of public transit, pedestrian, and bicycle travel options.
- “The Presidio will be a lively and active community. The site will be used to create models of environmental sustainability, perfecting practices and technology that can be transferred to communities worldwide.” (Plan Highlights, GMPA, p. viii.)

44-8

These objectives provide a clear picture of how the GMPA’s vision for the Presidio can be achieved. In fact, the entire document is structured specifically to guide managers in a logical path to success. The plan itself, with its park-wide and planning area principles and concepts grounded in the fundamental vision and objectives framed by the document, is designed to guide every stage of the decision making process and speaks directly to the future planner.

In its entirety, the GMPA is a programmatic planning document. In addition to establishing a vision and objectives, the GMPA also defines appropriate uses for each planning area within the park. Of greatest interest for present purposes, the Letterman Complex was identified as a research and education facility and the main post was to house public and private organizations whose missions reflected the park’s purpose. (GMPA, pp. 72-75.) While the GMPA recognizes that supplemental NEPA analysis will be required to implement individual components of the plan, it did not anticipate that the identified uses would be altered.



C. Moving Away from the GMPA's Vision

If it is the policy of the Trust to follow the GMPA, as Trust officials stated in a meeting with several of the groups submitting these comments on June 16, 1999, it is not at all clear how the development of the Letterman Complex as presented in the DEIS will serve that end. With the exception of Alternative 1, the Science and Education Center, the alternatives all represent radical departures from the GMPA vision.¹⁰ The Trust is choosing to redefine what the GMPA says with respect to the Presidio's future.

This is best illustrated in the Trust's development of the "general objectives" of the GMPA. Page 6 of the DEIS remarkably states that the "general objectives of the GMPA are not precisely identified in the document itself; no list of 'general objectives' appears in the document." This statement can be interpreted as editorial slight of hand of the most disingenuous kind. Although the general objectives of the plan are clearly evident, and are set out in the list of plan "highlights" recounted above, the Trust is apparently relying on the mere absence of the words "general objectives" in the GMPA to invent its own.¹¹

44-9

Vague at best, the new objectives afford planners maximum flexibility in land use decision-making and effectively gut the vision of the GMPA. The open nature of their wording lacks any central theme or thread necessary to convey a comprehensive vision. The GGNRA legislation, GMPA and the Presidio Trust Act were created in recognition of and as protection for the Presidio's significant historic, cultural and natural resources. Without doubt, the Presidio boasts unequalled natural and scenic beauty; yet, it is the Presidio's history as a military installation, dating to the Spanish and Mexican periods, that distinguishes it. The Trust's "objectives" do not in any way recognize the historic significance of this site. The addition of "where appropriate" to the first of the four "objectives" allows the Trust broad discretion in its responsibility to preserve and enhance the very resources that called for the GGNRA legislation in the first place. As a result of this maximum flexibility, we cannot know what the Presidio will become, nor can we effectively evaluate the options put before us by the Trust.

¹⁰ The other alternatives include: a Sustainable Urban Village (#2), a Mixed-Use Development (#3), a Live/Work Village (#4), and the aforementioned Digital Arts Center (#5). The sixth alternative was "No Action." (DEIS, pp. 11-48.)

¹¹ The objectives identified and adopted by the Trust are:

- (1) To preserve and (where appropriate) enhance the cultural, natural, recreational, and scenic resources of the Presidio;
- (2) To address the needs of Presidio visitors, tenants, and residents for community services such as transportation, water, power, waste management, and public safety (among others) in an environmentally responsible manner, while minimizing undesirable impacts on neighboring communities;
- (3) To increase open space, consolidate developed space and provide for appropriate uses of the Presidio, particularly uses that involve stewardship and sustainability, cross-cultural and international cooperation, community service and restoration, health and scientific discovery, recreation, the arts, education, research, innovation and/or communication; and
- (4) To sustain the Presidio indefinitely, both economically and physically, as a great urban national park. (DEIS, p.6.)



This fundamental problem is exacerbated by the fact that the identification of the new objectives was done without any notice to, review by, or opportunity to comment by the public, in direct contradiction of the Trust's legislative mandate as discussed above. Characterized on page 6 of the DEIS as an "exercise of its administrative discretion," the Trust staff and board have, in effect, vacated the public's own established vision and objectives and replaced it with something else. What, if any, vision the Trust now has for the Presidio cannot be discerned from their objectives.

44-9

D. The Letterman Alternatives

The selection of development alternatives for inclusion in the DEIS makes clear the Trust's need to redefine the GMPA vision. Following its own objectives, the Trust need only follow the broadest interpretation of the GMPA and has maximum flexibility in the selection of alternatives. In order to pay lip service to the GMPA, the DEIS shifts the analysis of the Letterman Complex alternatives from the GMPA's programmatic focus to analyses based on the quantitative details found in the GMPA.

The most striking example of this shift in focus is the discussion of the "preferred alternative." While the Digital Arts Center clearly reflects none of the GMPA's vision, the analysis describes the proposal as being in keeping with the GMPA because a single tenant will be engaged, to some extent, in research. As further evidence of the Digital Arts Center's asserted consistency with the GMPA, the DEIS points to: meeting square footage and height restrictions; removing both LAMC and LAIR; preserving scenic vistas; and the fact that new construction will be in keeping with the historic landmark district.¹² (DEIS, pp. 161-2)

44-10

In reality, none of the elements identified in the DEIS as being consistent with the GMPA relate at all to its vision either generally or for the Letterman Complex specifically. While the GMPA considers the Letterman Complex as a 60-acre whole, the DEIS, despite some allusions to the entirety of the site, is really a development plan for the 23-acre core, which features more new construction of a greater magnitude and density than was contemplated under the GMPA. What is more, while no alternative is closely consistent with the GMPA, the Digital Arts Center is arguably the most inconsistent -- in that it is the most private, least park like, completely lacks housing, and is the least devoted to finding solutions to global concerns. The Trust-established "general objectives" have led to development proposals which, if allowed to move forward, will reorient the entire Presidio toward an alternative vision -- one that is not supported, understood, or even articulated to the public.

E. Repercussions of Inconsistent Planning

As we have stated in the past, both individually and collectively, our organizations are mindful of the Trust's requirement for financial self-sufficiency. This mandate certainly makes the agency's task more complex, particularly when it must be accomplished by 2013.

44-11

¹² As discussed below, several of these purported "consistencies" with the GMPA are illusory.



(Trust Act §105(b)) The proposals contained in the DEIS certainly reflect the urgency of the situation. If this document, however, is intended to give us confidence that the Trust can succeed, it has failed to do so. Absent from the DEIS is any evidence of how the Trust is making important choices that will not only serve its financial mandate, but also its responsibility to advance the purposes of the national park.

The public is left, therefore, with having to comment on a group of alternatives without any sense of how any one of them, including the preferred alternative, will interact with future decisions at the Presidio. This leaves many concerned reviewers with little to judge by other than the effects of various alternatives on their quality of life. Hence the support of many Presidio neighbors for the Digital Arts Center. This approach also allows the Trust almost unfettered flexibility in piecemeal development of the park. This strategy may prove effective for the Trust in the short run. But, as the Presidio begins to change in ways that were not originally understood, the public will become increasingly concerned. Without public support, the Trust will be unable to fulfill its responsibilities.

44-11

Without context, the alternatives stand out as simply another proposed development project. In a national park setting this is unsettling enough. But, as we articulate in the following sections, the lack of consistency with the GMPA also has led to significant flaws with respect to compliance with the National Environmental Policy Act.

F. The Trust Should Undertake to Amend the GMPA

The Trust has repeatedly stated that it intends to conform its actions to the GMPA. Yet as demonstrated above, the Trust's interpretation of the GMPA does not match the letter or the spirit of the document in its current form. If the Trust truly believes that the changes it has made to the vision of the GMPA are warranted, it should amend the document to present its current vision for the Park. This at least would allow the public the chance to understand, and participate in, the Trust's plans for the Presidio.

44-12

Amending the GMPA may be necessary regardless of the growing disjunction between its vision and that of the Trust, simply due to the changed circumstances since the GMPA was finalized in 1994. In the intervening five years, major circumstances affecting the Park and its environs have changed. The passage of the Trust legislation itself is not the least of these changes. This single act changed the managing authority of the Park, and also imposed the necessity for financial self-sufficiency. Surely, these changes warrant a re-examination of the roadmap for the Park's future. Furthermore, housing and traffic problems in the City of San Francisco have increased dramatically since the GMPA was finalized. Since the Presidio may play a key role in either exacerbating or alleviating these problems, it seems that a reconsideration of Park-wide planning is in order.



IV. THE PLANNING GUIDELINES

The Presidio Trust is to be commended for the both the quality of the work that is displayed in the *Planning Guidelines for the Letterman Complex* (published in the DEIS as Appendix B) and for providing interested members of the community the opportunity to comment upon them in their draft form. The Presidio project is, as the Park itself, unique, and the Trust’s work involves the careful balancing of a great many factors. The *Guidelines* produced by the Trust represent a significant achievement in striking such a delicate balance. The participation of the public will, we believe, enhance, not inhibit, the Trust’s achievement of its aims and goals and this is an obligation all of our groups take seriously.

There is a great deal to be admired in the draft *Guidelines*. Unfortunately, the Trust seems to have abandoned them in choosing its preferred alternative. The Digital Arts Center falls far short of the aims set in the *Guidelines*. While none of the other alternatives completely fall within the *Guidelines*, several come significantly closer than the Digital Arts Center, leaving the public to wonder what the other values were that made the Digital Arts Center the Trust’s preferred alternative.

A short review of the substance of the draft *Guidelines* shows their strengths: the close ties to the vision adopted in the GMPA, the articulation of a framework for the Letterman Complex site that takes into account the impact on the wider park and on the visitor, and the sensitivity to the history and meaning of the area. The same overview reveals how far the preferred alternative, and indeed, the other options considered differ from the announced guidelines.

44-13

The Planning Guidelines “provide a planning and design framework for the entire range of actions expected in the 60-acre Letterman Complex....” (DEIS, p. B-1.) Unfortunately, the DEIS does not explain what the process will be for assuring that the alternatives comply with the Guidelines. In addition, the Guidelines were developed after the Letterman RFQ process. The respondents to the Letterman RFQ did not have the benefit of the Guidelines when designing their proposals. As a result, the public has no genuine opportunity to review the project alternatives against the goals of the Guidelines. So little detail is provided for each of the alternatives (materials, building elevations, detailed site plans, view corridors) that the reader has little basis on which to judge which or whether alternatives meet the goals of the Guidelines.

A. The Content of the Guidelines

The draft *Guidelines* set forth a well-thought out and complete framework for “the entire range of actions expected in the 60-acre Letterman Complex.” (DEIS, p. B-1.) Included within the planning document are not just specific rules for building, but a broad and careful description of the larger context of the development, emphasizing not just the history of the site but overarching policy concerns associated with any new development. These overarching policies identified by the Presidio Trust in the *Guidelines* are:

44-14



- A National Park in an urban setting
- National and regional context
- National historic landmark district
- Models for sustainability (*Id.*)

It is these values, and the specific history and character of the Letterman site, that animate the planning guidelines in the specific areas of :

- Land Use and Public Access
- Pattern of Development
- Scenic Views
- Cultural and Natural Landscape
- Building Form
- Access, Circulation, and Parking

Each section begins with a brief introduction giving goals and direction for planning, and then details both broad design principles and specific guidelines for redevelopment of the site.

The Land Use design principles stress that the Letterman complex design should: “encourage[] and accommodate[] a wide range of uses, reinforcing the Presidio as a unique community in which to work, visit or live;” “integrate public access with private development;” and “encourage visitors and promote educational, interpretive, and recreational amenities.” (DEIS, p. B-14.) Additional guidelines stress the importance of the visitor experience, emphasizing that the development should “showcase and interpret the history of the Letterman Complex and relate to other Presidio themes and national park visitor experience.” Recommendations include a Letterman visitor center, museum or walking tour. (Id.)

44-14

The Natural Landscape guidelines identify the significant natural components of the site including wildlife, the stands of mature tree scattered about the site, and the wildlife that these stands sustain. The guidelines emphasize the need “to protect, preserve, and enhance these natural features.” (Id., p. B-19.)

The Cultural Landscape guidelines emphasize the history of the site, and encourage development to take its cues from that history. (Id., p. B-23.)

Scenic view guidelines call for the preservation and enhancement of scenic views and historic vistas both into and from the Letterman Complex. (Id., p. B-32.)

The guidelines for Building Form call for new construction to be compatible with the historic architecture of the site, while featuring design that will help model the Presidio’s goal of sustainability. (Id., p. B-35.)

Finally, the guidelines for Access, Circulation and Parking stress the need for the future of the development to “decrease dependency on the automobile” and to “encourage alternative modes.” The guidelines note that the Complex is “ideally suited to promote this



goal by enhancing pedestrian and bicycle connections, and improving transit access.” Part of the strategy for this includes the promotion of a “strong jobs/housing balance.” (DEIS, p. B-41).

44-14

B. The Strengths of the Draft Guidelines

There is much in the draft *Guidelines* to praise. The sensitivity to the Letterman Complex history, the visitor experience, the importance of modelling sustainability, and the recognition of the scenic, natural, and cultural resources of the site, make the *Planning Guidelines* an adequate baseline to insure that development of the Letterman site minimally respects the Presidio’s role as a national park in an urban setting. The specific guidelines, while occasionally lacking detail,¹³ attempt to integrate all the values that must go into any project chosen for this unique resource. Further, the planning guidelines recognize the importance of, and take their general shape from, the work done in planning for the Letterman Complex in the GMPA. Thus they consider the development of this site in the context of a larger vision for the park, both past and future. As the Trust has articulated, the GMPA should provide the basis for future actions at the park, yet the particular tenant anticipated for the Letterman Complex by the GMPA is no longer available. The *Guidelines* admirably provide a transition from a plan for a specific tenant to a framework that can accommodate a number of different uses without abandoning the core vision of the earlier GMPA.

44-15

The Trust also deserves praise for bringing the draft *Guidelines* before the public, so that they can appreciate the work done, evaluate and comment on their contents as contemplated by the Trust Act, and utilize their contents to evaluate the alternatives presented.

Unfortunately, little of the draft *Guidelines* survives in the Digital Arts Center proposal. Moreover, given the Digital Arts Center’s substantial failures to meet the Trust’s Guidelines, we cannot help but wonder what factors led to its selection as the preferred alternative.

C. The Digital Arts Center

The Lucasfilm project has little in common with the framework provided by the draft *Guidelines*.

44-16

The heart of the Digital Arts Center is a series of three four-story office buildings in a campus-like setting. These buildings would have generous setbacks from the site edges, and contain inner courtyard space larger than the remaining open space. (DEIS, p. 31.) The remaining seven acre open space would form a public park with a lagoon along the Gorgas

¹³ One oversight is a lack of clear pictures of the views to be maintained into and out of the site. Also the relationship between building on the 23-acre parcel and the rest of the 60-acre Complex is under-explored. In addition, the “architectural characteristics” contain no discussion of building materials. (Cf., DEIS, p. B-0.) Since much of the construction at this site is of wood, this fact should be acknowledged in the final guidelines.



Avenue edge of the development.¹⁴ In addition to the “park,” planned public amenities include a café, restrooms, coffee bar, and promenade. A digital effects archive would be open to scholars, while educational programs would train future digital effects workers (many of whom presumably would be employed in the office complex). In all, of the 900,000 sq. ft. of construction proposed, 840,000 would be given over to private office uses. A total of 1,500 parking spaces would be created in underground garages to accommodate the 2,500 employees at the site. (*Id.*) No housing is included in the plan, nor are there any activities associated with the past uses of the Letterman Complex or the rest of the park. The office campus is just that, a self-contained unit disconnected and different in purpose from the rest of the park.

44-16

How do the specifics of the plan match with the planning guidelines described above? There is little if any intersection. Compare the following:

<i>Planning Guidelines:</i>	Digital Arts Center
“The key to successful redevelopment of the Letterman Complex lies in regaining this vitality by creating a diverse, lively, publicly accessible community. The Letterman Complex should incorporate a variety of resources and activities that serve employees, residents and visitors to the site and create a dynamic public setting appropriate to its stature as part of a national park.” “encourage[] and accommodate[] a wide range of uses, reinforcing the Presidio as a unique community in which to work, visit or live;” “integrate public access with private development;” “encourage visitors and promote educational, interpretive, and recreational amenities.” (<i>Guidelines</i> , p. B-14.)	“This alternative’s concept is an office campus. . . .” (DEIS, p. 31.) Does not encourage or accommodate a wide range of uses. Does not encourage visitors.
For the Letterman Drive entryway, “public uses with a strong focus on education and interpretation of the area’s historic, cultural and natural resources encouraged.” (<i>Id.</i>)	Virtually none. There would be a “visitor entrance” to the building along Letterman Drive, “where a driveway and passenger drop off point would be located.” (<i>Id.</i> at 33.)
Create a significant open area at the O’Reilly commons, to serve as the focus of	Aside from an 85 foot buffer, little to no significant open space. (<i>Id.</i> at 32.)

44-17

44-18

44-19

¹⁴ We cannot help but note that the alternative describing the Digital Arts Center refers to this open space as a public park, as if the entire project were not already located within a National Park. (DEIS, pp. 31-2).



the site. (<u>Id.</u> at B-16.)		44-19
Gorgas Avenue edge to be the active, event-oriented, urban face of the park with recreational, retail, and cultural program uses. (<u>Id.</u>)	The Gorgas Avenue edge is a park, promenade, and lagoon. (<u>Id.</u> at 31.)	44-20
The development should “showcase and interpret the history of the Letterman Complex and relate to other Presidio themes and national park visitor experience.” Recommendations included a Letterman visitor center, museum or walking tour. (<u>Id.</u>)	None such.	44-21
Ground floor pedestrian amenities throughout the Complex, including retail, cultural, educational and visitor services. (<u>Id.</u> at B-17.)	Coffee bar, café, promenade, and restrooms for “visitors.” ¹⁵ (<u>Id.</u> at 33.)	44-22
Create a network of open spaces throughout the Complex, accessible by pedestrians, and integrated into the site. (<u>Id.</u>)	Most of open space concentrated in courtyards which are not accessible to the public. A Great Lawn/park which is a discrete space not integrated to the rest of the site (much less the rest of the Presidio). (<u>Id.</u> at 31.)	44-23
Natural Landscape guidelines to preserve, protect, and enhance natural resources of the site. (<u>Id.</u> at B-19.)	Guidelines proposed as “mitigation” of project impacts. No enhancement of natural resources. (<u>Id.</u> at 39.)	44-24
Stormwater drainage to be directed to Tennessee Hollow or Crissy Field wetlands. (<u>Id.</u> at B-21.)	Stormwater drainage to the “lagoon.” (<u>Id.</u> at 31.)	44-25
Fine grained development, emphasizing human scale design. (<u>Id.</u> at B-27)	Three large office buildings. (<u>Id.</u>)	44-26
“Development patterns reminiscent of a ‘gated’ community or exclusive campus are strongly discouraged.” (<u>Id.</u>)	“[A]n office campus.” with the majority of open space contained within private interior courtyards. The remainder is a separate lawn with little connection to the facilities. (<u>Id.</u>)	44-27
Conform to historic practice with water features: small courtyard fountains and surface runnels. (<u>Id.</u> at B-28.)	“Lagoon” feature as part of the “Great Lawn” or none. (<u>Id.</u>)	44-28
Scenic views to be preserved or enhanced both into and out of the site. (<u>Id.</u> at B-32.)	East-West views across O’Reilly Avenue blocked. Thornburg Avenue view corridor	44-29

¹⁵ We note it is unlikely that the Digital Arts Center could meet the needs of its 2,500 employees without most of these facilities.



	blocked. No evaluation of views of the site from other areas of the Presidio. (See, Figure 9, DEIS at 32.) No visuals presented to aid reviewers in evaluating view impacts.	44-29
New construction to be compatible with the historic architecture of the site. (Id. at B-35.)	Without more fully developed design proposals and some visual aids (photographs, drawings, plans, elevations), it is virtually impossible to judge compatibility. It appears from the scant information given in the DEIS that the new construction may clash with the historic buildings throughout the Letterman site and particularly those across O'Reilly avenue. (Id.)	44-30
"Front Door" along Lombard Street to include "public zone." (Id. at B-16.)	Holds to street edge, but no public uses beyond dropoff point. (Id. at 33.)	44-31
Building to street edge of O'Reilly Commons with many pedestrian entryways into site. (Id. at B-37)	No O'Reilly Commons. Impenetrable edge blocking both views and pedestrian access to the site. No street level amenities. (Id.)	44-32
Gorgas Avenue edge to be sharply defined, urban and active. (Id.)	Gorgas avenue "edge" is amorphous, pastoral, and isolated.	44-33
Strong jobs/housing balance. (Id. at B-41.)	No housing at Letterman. 2,500 employees. (Id. at 14.)	44-34
Decrease dependency on automobile. (Id.)	Site primarily served by off site employees numbering 2,500. Construction of circa 1,500 parking spaces anticipated. (Id.)	44-35
Enhance linkages between the Letterman Complex, rest of the Presidio and possibly the rest of the City. (Id. at B-14.)	Linkages to city, Presidio as a whole and rest of Letterman site are weak.	44-36
Encourage new development to be compatible with the scale, architectural character and pedestrian-friendly quality of existing historic buildings.... (Id. at B-35.)	The lack of design information makes evaluation here extremely difficult if not impossible. The scale of the new construction does not appear to be in keeping with existing buildings.	44-37

D. The Other Alternatives

This critique has focused, with good reason, on the Trust's announced preferred alternative: the Digital Arts Center. This focus should not mask discrepancies between the other alternatives and the draft *Guidelines*, none of which completely conform to the *Guidelines*, particularly as they concern the O'Reilly commons and scenic views. Still, most



of the other alternatives are superior to the Digital Arts Center at least in their mix of public and private facilities, in the educational facilities offered to the public, and in their integration into the wider park. Some, notably the Sustainable Urban Village (#2) and Live/Work village (#4) are also significantly better at achieving a strong jobs/housing balance.

Given this, it is natural to ask what guided the Trust's selection of its preferred alternative if not compatibility with its own guidelines for the Letterman Complex? The selection of the Digital Arts Center seems arbitrary if the factors to be considered were those presented in the *Guidelines*.

Indeed, given the failure of any of the alternatives to meet the *Guidelines*, the same criticism of arbitrary decisionmaking can be leveled at the selection of the entire set of alternatives and the rejection of other plans for the Letterman Complex site. As none of the plans comply with the *Guidelines*, what values made the four development proposals selected for consideration in the DEIS as alternatives separable from other responses to the Letterman RFQ? These values must be brought to light for public comment and discussion, to insure that the Trust is adequately and attentively carrying out its mandate.

In addition, there is a problem, discussed further below, in that there are hints throughout the DEIS that the "preferred alternative" will be changed to bring it in line with the draft *Guidelines* at some later point in this process. (See, e.g., DEIS, pp. 39-41.) While any modification of plans to move them toward compatibility with the well-thought out *Guidelines* would be welcome, these hints are problematic. They indicate that the public is not now being afforded the opportunity to comment on the "real proposals" as the proposals presented in the DEIS, and in particular the preferred alternative, will be changed significantly. This not only makes it impossible for the public to evaluate the proposals, but it also makes it equally impossible for the Trust to evaluate and respond to the public's comments since the alternatives commented upon are not those that the Trust will eventually consider. In addition to raising problems with NEPA compliance, this approach is inconsistent with the Trust's independent obligation under the Trust Act to consider public input, as discussed above.

44-38

Lastly, we question whether development of the *Guidelines* at this late stage may not lend an unfair advantage to the sponsor of the preferred alternative over others whose proposals were rejected earlier in the process.

For these reasons the commenting groups are gravely disappointed with the Trust's selection of the Digital Arts Center as its preferred alternative. We are, nevertheless, encouraged by the Trust's work with the National Park Service on the *Guidelines* and believe that these guidelines form the minimum basis for the development of the Letterman site. We urge the Trust to finalize the draft *Guidelines*, to commit to conforming to them in the future, and to recognize that the Digital Arts Center, at least in its present form, fails to meet these minimum standards.



V. NEPA

Our review of the DEIS reveals a number of serious NEPA deficiencies, including, but not limited to: an improper tiering to the earlier EIS for the GMPA; missing sections addressing the Trust’s vision for the Park as a whole and its financial plan; a lack of any discussion of the natural resources peculiar to the Letterman Complex site; an unduly truncated set of alternatives; inadequate analysis of direct impacts on visitor experience, the Park as a whole, parking, traffic, sewer, and water usage; the masking of negative impacts by reliance on nonmandatory mitigation plans; and the lack of cumulative impact analysis on development of the Park or the GGNRA as a whole. In addition, as detailed below, and as previously indicated, we remain concerned that the Trust’s decision-making process has violated the fundamental goal and requirements of NEPA.

44-39

A. The Relationship of DEIS to EIS on GMPA Is Unclear

According to the DEIS, its contents are tiered to the EIS on the GMPA. (DEIS, p. i.) While this may have been the authors’ goal, it has not been achieved. First, the draft does not clearly identify the differences between the characteristics of all the alternatives under consideration and those allowed for under the GMPA. These differences include the fact that, in the earlier EIS and the GMPA, the Letterman Planning Area was identified as a 60-acre site and replacement construction was to be permitted anywhere within that area. Here, the site appears to be limited to 23 acres (although there are a number of confusing references to the larger area), the Trust’s plans for the remainder are totally unknown.¹⁶ Similarly, only one of the two buildings at the Letterman Complex was to have been torn down under the earlier EIS and plan, (GMPA EIS at 22; GMPA at 72), whereas both buildings would be torn down under most of the development proposals accepted by the Trust¹⁷ and, as indicated, rebuilt within less than half the original acreage. (DEIS p. 3.) The total square footage of replacement construction has increased, and at least in the case of the preferred alternative, no housing is included. Not only does the draft fail to acknowledge such discrepancies, it provides no explanation for them even though they are clearly material and relevant to environmental impacts.

44-40

Second, the instant document should provide more, not less information about the specific resources of the project area than did the EIS on the GMPA since the activity being contemplated is a site-specific action. The description of the affected environment in the DEIS, however, says nothing about the area’s natural resources. (Cf. DEIS, pp. 49-75.) It provides no information about the trees found there or the wildlife resources, including in particular, resident avian species that inhabit its trees. It says nothing about the hydrology of the area, and, in particular, drainage patterns from its watershed. (Id.)

44-41

¹⁶ Does the Trust plan to permit additional building at the Letterman site? If so, for what purpose and under what circumstances? Alternatively, has it decided to bar additional building?

¹⁷ Only the No Action (#6) and the Science and Education Center (#1) would retain one (#1) or both (#6) of the major buildings. (DEIS, p. 12.) These were among the first alternatives eliminated by the Trust, as discussed below.



Nor does the document address the potential for toxic materials on the Letterman site. Inasmuch as such information is not provided, it is hardly surprising that the document fails to analyze the impacts of the preferred alternative and others on these resources.

44-42

B. The DEIS Lacks Adequate Information

The information that the DEIS lacks includes both environmental information as indicated above and information about the Trust's financial, land use, and overall plans.

As discussed above, the preferred alternative as well as other alternatives do not fulfill the general or specific objectives of the GMPA. Although officials of the Trust stated in a private meeting on June 16, 1999 that, as a matter of policy, the Trust has decided to comply with the GMPA, no such statement is made in the DEIS. On the contrary, the draft states that the GMPA's land use concept may no longer be valid (DEIS, p. i) and plainly suggests that the only thing that the Trust intends to comply with is its own identified "objectives" which, as discussed above, do not constitute an overall plan or vision for the Presidio. The lack of such a plan is a critical omission of this document as is the lack of a financial plan.

Without an overall plan or vision, readers cannot evaluate how any of the development alternatives under consideration, including the preferred alternative, do – or do not – advance the Trust's overall goals and objectives. Similarly, in the absence of such a plan, readers cannot tell how the choice of any of the development alternatives will affect future development decisions.

44-43

Similar problems result from the lack of a financial plan. The Trust has said its decisions are based on financial necessity. Yet, its financial plan – with specific sources of revenues and financial projections – has not been given to the public. Without such a plan, members of the public cannot know what potential income sources have been considered.¹⁸ Without such a plan, readers cannot tell how well the alternatives will – or will not – further the Trust's financial plan for the Presidio. Nor can we determine how the choice of any one of these options or even options overlooked or rejected by the Trust will affect the financial future of the Presidio and/or future development decisions. In short, because the DEIS presents neither financial nor overall plan information, readers simply are unable to evaluate fully the available options, including the preferred alternative. The failure to provide such basic, necessary information is a critical flaw in the document.

We are sincerely appreciative of the Board's commitment to providing the public with a fuller understanding of its view of the GMPA and its Financial Management Program, as expressed in Chairman Toby Rosenblatt's July 13, 1999 letter to Brian Huse, Pacific Regional

¹⁸ For example, has the Trust considered charging for parking? Did it examine the possibility of convincing government agencies that rent office space in downtown San Francisco to relocate to the Letterman site? Were public facilities that could both entertain and educate explored? What about museums that need new space, such as the Academy of Sciences?



Director, National Parks and Conservation Association *et al.* However, that information will not be available until after closure of the comment period on this DEIS. Accordingly, it cannot be put to use in reviewing this document or its contents. As such, even if the information provided is not too little, it will definitely be too late to remedy this critical deficiency.

44-43

C. The DEIS' Alternatives Are Problematic

NEPA requires that a full range of alternatives be discussed (Greene County Planning Bd. v. Federal Power Com'n., 559 F.2d 1227 (2d Cir. 1976)), as well as that the final choice among them be postponed until after the EIS process is complete. (Public Service Co. of Colorado v. Andrus, 825 F.Supp. 1483 (D.Idaho, 1993).) This document is problematic in both respects. First, the number and range of alternatives has clearly been significantly truncated. Surely the Trust would never claim that it might select either Alternative 1 (Science and Education Center [Updated Presidio GMPA Alternative]) or Alternative 6 (No Action). As we have been reminded repeatedly, no proposal to carry out the GMPA was submitted to the Trust in response to the RFQ. Moreover, it seems inconceivable that the Trust would decide to do nothing at the Letterman Complex site. Indeed, according to the DEIS, “[f]undamentally, the Presidio Trust has determined that neither of these alternatives fulfills the Presidio Trust’s statutory mission and responsibilities, after considering economic, environmental, technical and other factors.” (DEIS, p. xiii.) At best, therefore, there are four alternatives under consideration.

These alternatives do not encompass the range of development options in this area. All four of the alternatives presented would occupy only 23 acres of the 60-acre Letterman area identified in the GMPA. None of them contemplate a lower density level. All of them also contemplate a 900,000 square foot development in the area. (DEIS, p. 12.) None of them address the question of whether a development of that size is wise – even with the unmistakably private and formidable presence such development will clearly produce. (*Id.*, pp. 21-34). There is no reason that new development in this area must occupy 23 acres or match the existing square footage. Accordingly, alternatives that explored these issues are among the alternatives that should have been considered but were not.¹⁹ In particular, since the RFQ specified that 900,000 square feet of building was required, a smaller option should have been considered along with one that contemplated spreading the density of development out more thoughtfully and sensitively.

44-44

In fact, however, there are not four alternatives under consideration: there are no more than two – and there may be only one. Two alternatives – Alternatives 2 (Sustainable Urban Village) and 3 (Mixed Use Development) – have already been publicly rejected by the Trust. In a May 3, 1999 press release, Trust Executive Director Meadows stated, “we have had the luxury of selecting two highly qualified teams from a strong field. If, for any reason, there are difficulties during our discussions with the two short listed teams, I am confident the Trust

¹⁹ Other alternatives that should have been considered include those suggested by the Sierra Club Presidio Committee.



could enter into successful discussions with either of the remaining teams.” (Emphasis added.) Further he said, only two of the four “merit a closer review if we are to select the plan that best meets the Trust’s goals for the Letterman site....” These statements clearly indicate that – at least as of May – in the minds of the Trust, there were only two choices. Two options – even two options as different as the Digital Arts Center and the Live/Work Village (Alternatives 4 and 5) – do not constitute an adequate range of options under NEPA. In any case, newspaper articles and the Trust’s own actions have allowed the public to believe that once the choice was made between the two “short listed” teams, it would be the final choice, as discussed below.

44-44

Then there are the problems, alluded to above, associated with statements in the DEIS to the effect that at least the final alternative will be adjusted to conform to the draft *Guidelines*. (DEIS, pp. 34-43.) As indicated above, none of the four development alternatives meet the *Guidelines*, the preferred alternative least of all. If the final choice is to be changed to meet the *Guidelines*, then these options are not after all the real alternatives and the final choice will be a *new* alternative that needs analysis under NEPA, together with public review and comment. In contrast, if the options are real, then they do not satisfy the *Guidelines* and, as discussed below, the impact analyses are inadequate.

D. The Analysis of Direct Impacts Is Inadequate

The DEIS’ analysis of direct impacts is inadequate in two respects: first, some key assessments are simply not provided and second, other assessments are simply too superficial or problematic to qualify as the “hard look” that NEPA requires. (Marble Mountain Audubon Soc. v. Rice, 914 F.2d 179 (9th Cir., 1990).) In turn, these inadequacies are compounded by use of the *Guidelines* in such a way as to mask potential negative impacts.

1. Key assessments are lacking

The DEIS lacks any assessments of the impacts of the development proposals on other parts of the park, important natural resources of the Letterman Complex area, including, as indicated above, its trees and wildlife, or on the visitor experience. It also fails to provide an analysis of the visual impacts of these proposals as seen from any point within the Presidio or from outside – even though all of these resources will be affected significantly by the proposed development at the Letterman Complex. As the National Trust for Historic Preservation has written:

44-45

Letterman occupies the most public location in the park. The site is highly visible and in most cases is the visitors’ first impression of the park. Since the Lombard gate will remain the major entrance to the Presidio, we can assume that the majority of visitors will encounter the Letterman complex project first, which will set the tone for the Presidio. It is imperative that the development of this area of the Presidio reflects the openness and accessibility that is essential to a park of this stature.



(May 25, 1999 letter to Chair, Presidio Trust from Director, Western Office, National Trust for Historic Preservation.

Regrettably, despite attempts to accommodate public uses, the alternatives, and particularly the preferred alternative, are virtually certain to result in negative impacts to these key park attributes, in part because the Trust’s own *Guidelines* were not adhered to in selecting them. In any event, since the Presidio is part of a national park visual impacts to its environs cannot be ignored. Moreover, since the Letterman Complex site is part of the Presidio National Historic Landmark District, visual impacts cannot be ignored. Yet, these impacts remain completely undiscussed in the DEIS.

44-45

2. Other important effects are treated superficially.

Three key issues raised by the development proposals accepted by the Trust including, in particular, the Digital Arts Center proposal are: 1) parking and traffic, 2) water and 3) sewer capacity. In the case of the latter two issues, the draft essentially says “the City will take care of this for us.” (See DEIS, pp. 53, A-6.) More specifically, it asserts that the City will supply the needed water that cannot be obtained from Lobos Creek and that the Southeast Water Pollution Control Plant will handle the sewage. (*Id.*, pp. A-6-A-7.) Neither of these assertions is substantiated and, in the case of the sewer facility, we have been unable – despite trying for several hours on several occasions – to find anyone there who will substantiate the statement that “treatment facilities operated by the [City] have sufficient wastewater treatment capacity to accommodate the estimated outflow.” (*Id.*, p. A-6.) What is more, in the case of both water and sewage, the quantities estimated are only for the Letterman Complex development, rather than the for the Presidio as a whole. The Letterman Complex is, of course, only one part of the Presidio and the Trust not only will be making decisions in the future that will have impacts on water and sewage, but has already made such decisions in connection with leasing other Presidio locations. These additive amounts should not be ignored and, in considering them, the analysis must take into account the fact that *already* serious water quality problems resulting from combined sewer overflows, stormwater and runoff exist and have necessitated numerous beach closures at the Presidio in the past year.²⁰ Last, but not least, non-quantified, non-mandatory water conservation measures certainly cannot be assumed to effectively mitigate excess water demands. (DEIS, pp. 35-6.)

44-46

The DEIS’ treatment of parking and traffic suffers from even more problems. First, the document contains no explanation of how or why it decided to classify the Digital Arts Center as a research and development facility, rather than office use, which was the classification assigned several of the other alternatives, despite similar research/administrative mixes. (DEIS, p. D-3.) The distinction is not trivial since the former category is deemed to generate an 11.42 person-trip rate and the latter 18.10. If the office classification had been applied to the Lucasfilm project, the number of trips generated would have been 6,925 rather than the 4,360 presented in the DEIS. Similarly, the weekday PM peak hour traffic would rise from 400 vehicle trips to over 690. On its face, there seems to be no justification for using

44-47

²⁰ See, NRDC, *Testing the Waters 1999—A Guide to Water Quality at Vacation Beaches* (July 1999), pp. 42-3.



different trip generation rates for these projects. If there is, it must be supplied for public review and comment.

44-47

Second, the DEIS's explanation of how these trip generation rates were arrived at poses many questions, particularly in terms of the Digital Arts Center. For example, auto trips were calculated using an average vehicle occupancy of 1.4 persons per trip, yet this figure is based on a San Francisco Citywide Travel Behavior Survey. Even assuming that some of the Digital Arts Center's employees move into the City, of what relevance is this figure to those who are commuting from the North or East Bay? Similarly, using current geographic distributions of employee and visitor trips to and from the Presidio to predict the destinations of the future employees of the Digital Arts Center flies in the face of common sense. (See DEIS, pp. D-6). The Digital Arts Center is a relocation of several existing companies with employees, not a brand new project. Surely many of those employees will choose to commute to the new employment location. It is groundless to assume that their travel patterns will match those of employees currently working in the Presidio. Further, all the trip generation numbers used an average based upon the size (square footage) of the facilities and not the actual number of employees involved. The reasons for this must also be discussed.

44-48

Third, the DEIS does not explain how these trips both by vehicle and other modes of travel were converted into the 1500 parking spaces that will be housed in new garages at the Letterman Complex. If the estimated number of daily auto trips to the Letterman Complex that the Digital Arts Center will generate is really only 4,360 (DEIS, p. D-5) or even 6,120 (*id.*, Table 14, p. 94), and the parking demand is 1,260 spaces (*id.*), why can't these cars be parked in existing parking spaces which total 13,000 according to the Final GMPA EIS? (GMPA EIS, pp. 126-27.)

44-49

On the other hand, if there are really going to be 4,360 or 6,120 trips per day, how can it be that only 400 cars will enter the Presidio at peak periods via all gates to go to the Letterman Complex? (See DEIS, Table D-7 at D-7.) Will the Trust prohibit employees of the Digital Arts Center from coming at peak periods? Will employees be required to come at assigned non-peak times? What about all the other vehicle traffic that will be coming to the Presidio at peak times? What in turn will be the effects on traffic outside the Presidio – *i. e.*, on Highway 101 and surface streets – if there is “a reconfigured intersection” at Gorgas Gate involving Richardson Avenue (*id.* at D-7), or even a “two-intersection configuration” there? (*Id.*, p. 36.) What will be the air quality impacts of the latter configuration? The impacts on noise levels? Does the Trust have the authority to construct such an intersection? What will be the effects within and without the Presidio on air quality as well as on traffic, if the intersection is not reconfigured?

44-50

We note that the supply of parking to be built by the Digital Arts Center far exceeds the amount allocated to it by the Trust's own Transportation Demand Management Plan. (DEIS, p. 165.) Such an oversupply can only encourage automobile traffic. The proposed “mitigation” of monitoring seems both vague and wholly insufficient. (*Id.*, p. 36.)

44-51



Finally, traffic flow will be reconfigured for the new development. A new Gorgas/Richardson exit will be added and the existing Gorgas/Richardson access routes reconfigured. The new Gorgas exit will be a primary departure point for the Letterman area and will cut extremely closely through the complex of historic industrial buildings (1170, 1160, 1152 and 1151). Impacts to these historic buildings and their users (YMCA for example) from this new source of traffic should be evaluated.

44-52

3. Impacts are masked by improper reliance on guidelines and mitigation plans.

While the DEIS reveals that the direct impacts of several of the proposals will be most severe, particularly as they concern water and traffic problems, the document attempts to mask these impacts through recitation of mitigation measures that it predicts “would reduce significant impacts on the resources . . . to less-than-significant level.” (DEIS, p. 34.) Several of these mitigation plans promise only that the *Planning Guidelines* would be incorporated into the various proposals. For instance, the mitigation plan for impacts on cultural resources consists entirely of reference to the draft *Guidelines* (DEIS, p. 37), and the plan for mitigating impacts on scenic views is equally dependent on the *Guidelines*. Further, other mitigation measures are left for future development, including the storm water pollution prevention plan and the “detailed landscaping plan.” (Id., pp. 36, 39.) There are several problems with this approach: most notably, the law is quite clear that mitigation measures, while they must be discussed in an EIS, need not be adopted by the agency.²¹ Since we have no way of knowing which measures are – or will be – required by the Trust and, if so, in what form (e.g., will they be strengthened or weakened), their value for mitigation purposes is really problematic.

44-53

In addition, while many of the mitigation plans are absent, others are not quantified. For example, the DEIS refers (at p. 35) to a water conservation plan, no where is there any prediction of how much water such measures will save or what will happen if this plan is unsuccessful. In the case of still other measures, it is sometimes difficult to discern exactly how they mitigate the problem.²² Finally, the Trust depends at several times on mitigation measures that are beyond its power to implement such as planned changes to the intersections surrounding the Presidio, and the acquisition of water to make up for Lobos Creek shortfalls from the City. Such measures clearly cannot be counted on to minimize impacts.

44-54

D. The Cumulative Impact Analysis Is Inadequate

The site of the proposed development is within a national park, the Golden Gate National Recreation Area. Yet the DEIS lacks any assessment of the cumulative impacts of any proposal on this park as a whole. The same is true of the Presidio’s status as a National Historic Landmark: the DEIS lacks any assessment of the cumulative impacts of the proposals on the Landmark status or qualities. In addition, the problem of masking cumulative impacts through reliance on mitigation plans and the draft *Guidelines* discussed above prevents

44-55

²¹ Mitigation efforts are not mandatory under the law. See, e.g., *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332 (1989).

²² For instance, the Digital Arts Center includes the use of a “Webpage” to reduce parking demand.



cumulative impacts from being assessed. Thus, for example, the cumulative impacts of non-point pollution cannot be predicted when neither the storm water pollution prevention plan nor the landscaping plan that are supposed to minimize those impacts has yet to be developed. Lastly, because there is no comprehensive management program, the cumulative impacts of any of the alternatives under consideration on that program cannot be assessed.

44-55

E. The Concern That the Trust's Mind Is Made Up Is Not Trivial.

As we have indicated above, we are concerned that the Trust's actions with respect to selection of the preferred alternative and its decision to engage in "exclusive negotiations" with Lucasfilm in regards to the Digital Arts Center have created – at best – the perception that NEPA's overarching goals have been disregarded and, at worst, that its requirements have been violated. This concern is derived from the Trust's own actions, and failures to act, as discussed below.

Several of our organizations wrote the Trust on May 24, 1999, to express our concern that the final choice of the Letterman developer was about to be made, while the comment period on the DEIS was still open, in violation of fundamental NEPA requirements. That concern, we have since learned, was shared by the U.S. Environmental Protection Agency here in San Francisco. Our concern was based on a variety of sources, including but not limited to articles in the local press. For example, on April 20, 1999, an article by Dan Levy appeared in the *San Francisco Chronicle* which stated: "Yesterday, one month before the trust's board of directors is scheduled to pick a developer for the coveted 23-acre Letterman Hospital site, park officials were hit with a barrage of complaints from locals." On May 21, in announcing its editorial support for Alternative 4, the Live/Work Village, the *Chronicle* revealed its belief that there were only two competitors and stated that "this week ... a federal panel selects a developer for the 23-acre Letterman" site. Again, on May 22, in an article headlined "Presidio Fight to the Finish," Dan Levy of the *Chronicle* said "[t]he plan that wins approval from the seven-member Presidio Trust board of directors on Thursday will set the tone for the character of the entire park...." Levy's article on May 29, referred to the "final round" again and to the competition as being between only two parties.

44-56

The coverage prior to the "final" choice in the *San Francisco Examiner* and other papers was similar. (See, e.g., *San Francisco Examiner*, "Decision on Presidio Developer Delayed," May 30, 1999; *Los Angeles Times* editorial, "Weighing Presidio's Fate," June 5, 1999.) And the initial articles after the selection of Digital Arts Center continued to treat the selection process as if it were all over, but for the details. (See, e.g., *San Francisco Chronicle* editorial, "A 'Star Wars' Winner for the Presidio Park," June 16, 1999; "Lucas Wins 'Presidio Wars,'" by Tyche Hendricks, *San Francisco Examiner*, June 15, 1999.)

As far as we have been able to determine, the Trust made no effort to correct the impression given by these articles with the papers or their readers. Certainly, as far as we can tell, the Trust sent out no clarifying press releases and wrote no letters to the editors of these papers, explaining that the final choice was not being made, that only the preferred alternative was being selected and that the formal process for the public to comment on options for

24



development at the Letterman site was only just beginning. On the contrary, the Trust's own press releases mirrored these articles.

For example, the press release issued on March 24, 1999, stated that "[t]he Board ... [would be] deciding on a finalist in May" and quoted Executive Director Meadows as stating the "the Board is focusing on selecting the best plan for the Presidio." (Emphasis added.) No mention was made of NEPA, the prohibition on making a final decision in advance of completion of the NEPA process or the concept of a "preferred alternative." The press release issued on May 3, 1999 similarly referred to the Trust's "narrow[ing] focus" and stated that its "short list allows the Trust to ... ultimately, determine which proposal is the most appropriate for the Letterman site." (Emphasis added.) Again, Executive Director Meadows was quoted, this time saying, among other things, that "after a single finalist is determined," "the development agreement process begins...." Again, neither NEPA or any "preferred alternative" was mentioned. It was not until May 26, 1999, two days after six of the organizations submitting these comments sent the Trust via fax a letter highly critical of the process it was utilizing, that the first press release referring to "the preferred alternative" was issued. The May 26 press release, however, was extremely short (four sentences) and provided no definition or other information about that term or the process.

The Trust's June 14, 1999 press release announcing selection of Lucasfilm/Digital Arts Center did refer to it as "the preferred alternative" on several occasions and did explain that its choice "does not indicate a final land use decision by the Trust." At the same time, however, that press release simultaneously announced that "exclusive negotiations" would begin with Lucasfilm, to "ensure that [its] plans ... are well integrated into the entire 60-acre Letterman Complex and the Presidio as a whole." Indeed, the headline on the release was "Presidio Trust Selects Letterman Digital Arts for Exclusive Negotiations of Letterman Site." As such, this press release conveyed a mixed message at best – that Lucasfilm was the winner of the Letterman Complex sweepstakes and, at the same time, that the winner had not yet been declared. It did not help that, in announcing the extension of the comment period, the press release made no mention of the public confusion that the Trust knew existed over the nature and finality of its decision. On the contrary, rather than acknowledging that additional time was being provided because of "public confusion regarding the continuing viability of Alternatives 1, 2, 3, 4 and 6," as stated in the Federal Register notice announcing the extension of the comment period, (64 Fed. Reg. 32899-02, June 18, 1999), the Trust's press release merely said that the extension was being granted "to encourage additional input in the SEIS process."

44-56

What is more, it is clear that not only the public, but also the Trust was confused about the NEPA process and the relationship between the alternatives and the final choice among them, as the DEIS plainly reveals. As indicated above, the Trust never referred in its press releases or otherwise in the media to selection of a preferred alternative until a month after releasing the DEIS. Not only did the draft not identify a preferred option, it states that "[t]he preferred alternative will be identified over the other reasonable and feasible alternatives by the time the final supplemental environmental impact statement is filed...." (DEIS at xiii.)



Yet, as documented above, less than one week after the draft was released on April 27, the Trust was talking about narrowing its focus to two proposals and making its final choice.

For individuals and organizations trying to follow the process, the initiation of exclusive negotiations with Lucasfilm raises still more concerns. Here we have been told repeatedly that time is of the essence, and that 2013 is looming ahead. Consequently, the Trust must move as quickly as possible to finalize plans for Letterman. While entering into exclusive negotiations is consistent with this oft-expressed need for speed, this need certainly undermines any claim that the Trust feels free to reject Digital Arts Center at the end of the NEPA process, in favor of another alternative. If the situation requires negotiations to begin immediately, how can the Trust keep an open mind about the other options? If the situation requires exclusive negotiations to begin immediately, how will the Trust be able to justify starting over again with another alternative at the end of the NEPA process? If the Trust, in fact, is so concerned about moving ahead on Letterman now, then how can there be any meaningful role for the public in the "exclusive negotiations"?

44-56

None of these problems or concerns are alleviated by the Chairman's recent comments to the effect that the NEPA process with its preferred alternative and the exclusive negotiation process with Lucasfilm were "parallel but independent decision-making processes." Given the circumstances detailed above, this statement does not alleviate the problem that the negotiations are proceeding prior to close of the public comment period on the draft and the completion of the NEPA process.

F. The Trust Should Supplement the DEIS.

Given the problems noted above, the commenting groups believe that the Trust must undertake to further supplement the DEIS before any development can go forward at the Letterman Complex site.

44-57

CONCLUSION

These comments are offered in the spirit of support of the Trust's enormous responsibility. It is our sincere desire, as friends of the Presidio, to see this experiment succeed in not only becoming financially self-sufficient, but also preserving the standards and values for which this park was established.

The Presidio Trust's DEIS and its current plan for the Letterman Complex, the Digital Arts Center, are both gravely flawed. The DEIS is improperly tiered to the earlier EIS for the GMPA and is missing key information on the Trust's vision for the Park and its financial plan. In addition, it lacks site specific information for the Letterman Complex on wildlife, toxics and watersheds and fails to consider an adequate range of development alternatives. Finally, it contains questionable assumptions in regard to water usage, parking, and traffic problems, and relies on nonmandatory mitigation measures to mask significant negative impacts.

44-58



Responses to Comments in Letter 44

4 4 - 1

The Trust recognizes the long-term commitment of the commenting organizations to the protection of the natural, cultural and historical resources of the Presidio, appreciates the opportunity to have opened up a working dialogue with these groups, and welcomes the opportunity to continue to work with these and various other organizations towards those goals. For the reasons referenced below, however, in response to the specific comments of the commenting organizations, the Trust disagrees with the conclusion that the Draft EIS must be supplemented.

We start by noting that a number of issues raised in the letter are important ones also raised by others, which the Trust has addressed generically in master responses. For a response to the comment concerning the Trust's compliance with the Trust Act and NEPA, refer to master responses 1A and 1B; concerning the adequacy of the Trust's public involvement process, refer to master response 1E; concerning the Trust's compliance with and apparent departure from the GMPA and compatibility of the preferred alternative with the GMPA, refer to master response 2A; and concerning the public availability of the Trust's financial plan and assumptions, refer to master response 5.

In the commentors' opinion, the Trust's selection of the Digital Arts Center (DAC) as the preferred alternative is a seriously flawed choice based upon seven distinct conclusions. The commentors' seven conclusions are in most instances subject to interpretation that is not shared by the Trust or uniformly by other commentors. The Trust will respond briefly to each of the seven asserted conclusions:

- 1) The assertion concerning number of employees is true as noted in Table 1 (2,500 employees versus the average of 1,700 employees for Alternatives 2, 3, and 4).
- 2) With respect to housing, while Alternatives 2 and 4 provided onsite housing, housing was not required or requested as part of the project nor was it previously envisioned for the site in the GMPA. More than half of Alternative 5's demand for housing would be met elsewhere within existing housing stock at the Presidio.
- 3) While the commentors are correct that the DAC has the second largest amount of parking, tenants under any alternative would be required to participate in TDM programs to reduce parking demand and meet Presidio-wide performance targets.
- 4) With respect to public amenities, of all the alternatives, Alternative 5 may provide the most public amenities given that almost one-third of the 23-acre site would be devoted to a public park, a substantial increase as compared to the existing site conditions, and the future ability of the DAC proponent to provide continuing park interpretive and support services.
- 5) The opinion that the DAC involves the "narrowest education focus" is noted for the record but is not shared by the Trust or other commentors, specifically the San Francisco Unified School District (letter 43), the American Association for the Advancement of Science (letter 63), or the California Department of Education (letter 64). The preferred alternative includes an archive related to the digital arts and an institute offering a digital arts training program. Both the archives and the educational institute would provide educational programs, including outreach to a diverse community, introducing schools and students to emerging multi-media.
- 6) Concerning compatibility with the Planning Guidelines, the record as documented in the EIS shows that the preferred alternative is largely consistent with the Planning Guidelines. These Guidelines are intended to be a continuing interactive set of guides that will be incorporated into the Design Guidelines and applied through the design review process and consultation under the Programmatic Agreement involving the continued scrutiny by the ACHP, the SHPO, NPS, and the public.



- 7) Finally, with respect to compatibility with the GMPA, the preferred alternative is fundamentally consistent with and fairly approximates the development allowed in the GMPA, which anticipated that a scientific research and education user would occupy the site as an anchor tenant. The developments are equivalent in many ways, including the public access aspects, the research and education components, the extent of open space (with the preferred alternative actually increasing open space), and the absence of a housing component.

The Trust has addressed the commentors' seven conclusions individually, but as the commentors note, a process has produced the Trust's choice, and the Trust believes that the commentors view the relevant criteria under the decision-making process too narrowly. In selecting the DAC as its preferred alternative, the Trust has considered not only the analysis of the seven criteria noted, but also the record of the EIS as a whole and factors not mentioned by the commentors such as the Trust Act's self-sufficiency mandate, its directive to give primary emphasis in tenant selection to those that enhance the financial viability of the Presidio, and the suitability of this site as compared to others under the GMPA for intensive development. The Trust, having considered and weighed all relevant decision-making criteria, selected the DAC as the preferred alternative because in its judgment, the alternative will best meet the Presidio Trust's mission, goals, and objectives.

4 4 - 2

For response to comments concerning the Trust's compliance with the Trust Act and NEPA generally, refer to master responses 1A and 1B; concerning conformity with the GMPA in the selection of candidates, refer to master responses 2A and 6A; concerning the Trust's identification of and compliance with the general objectives of the GMPA, refer to master responses 3A, 3B, and 3C; concerning the need for a comprehensive plan, refer to master response 4A; and concerning the consistency of alternatives with the Trust's Planning Guidelines, refer to master response 7A.

4 4 - 3

The issues raised in this comment are addressed in greater detail in comments 44-5 through 44-57. Please refer to the corresponding responses for a detailed discussion.

4 4 - 4

The comments in this introductory paragraph are addressed in master responses 4A, 5, 10A, and 10B. Also, please see master responses 6A and 7A.

4 4 - 5

For response to the comment concerning the process for identifying and conformity with the General Objectives of the GMPA, refer to master responses 3A, 3B, and 3C; concerning the need to develop a comprehensive plan before proceeding with the proposed project, refer to master response 4A. For response to the comment in footnote 9 concerning improper segmentation under NEPA, refer to master response 1D. Also, please see master responses 1A and 7B.

4 4 - 6

The comment is noted for the record.

4 4 - 7

The comment is noted for the record. For response to the comment concerning the conformity of the Trust's decisions with the GMPA, refer to master response 2A.



4 4 - 8

The comment is noted for the record. For response to the comment concerning the alteration of the GMPA's identified use, refer to Section 1.2 (Purpose and Need) of the Final EIS.

4 4 - 9

For response to the comment concerning departure from the GMPA, refer to master responses 2A and 4A, and Section 1.2 of the Final EIS; and concerning the Trust's identification of and compliance with the General Objectives of the GMPA, refer to master responses 3A, 3B, and 3C.

4 4 - 1 0

For response to the comment concerning the consistency of the Trust's actions with the GMPA and its "vision," refer to master response 2A; and concerning the General Objectives of the GMPA, refer to master responses 3A and 3B. We also note that other commentors have asserted that the Digital Arts Center embodies the vision of the GMPA (see letters 29, 30, 31, 34, 35, 37, 50, 51, 52, 63, and 64).

4 4 - 1 1

For response to the comment concerning the context in which to evaluate the preferred alternative and concerns with piecemeal development, refer to master response 4A.

4 4 - 1 2

For response to the comment concerning the Trust's interpretation of the GMPA and a need to amend the GMPA, refer to master responses 2A and 2B; concerning the need for certain additional park-wide planning, refer to master response 4A.

4 4 - 1 3

Please refer to master response 7A with regard to a discussion on the purpose of the Planning Guidelines and how each alternative complies with them. Text has been added in the Environmental Consequences, Cultural Resource section of each alternative to further detail inconsistencies between site plans and Planning Guidelines. Please refer to Section 1.4 of the Final EIS and master response 7B for a discussion of the future design review process.

The RFQ process was separate from but related to the Letterman Complex EIS process. The respondents to the RFQ process did not have Planning Guidelines to work from. The RFQ stage focussed on identifying applicants' demonstrated qualifications for successfully completing and operating the proposed project, and Planning Guidelines were not considered necessary at this initial stage. Following the RFQ stage, the Trust developed a draft set of Planning Guidelines for the Letterman Complex concurrently with the Request for Proposals (RFP) stage of the selection process. All teams who were selected to respond to the RFP did so with the same information about the Planning Guidelines, which were under development. Information was provided to each of the teams on almost a weekly basis as the Guidelines were developed. The Planning Guidelines, to be complemented by design guidelines, remain relevant for the duration of the design development and review process, a process that begins once the EIS process is completed.

4 4 - 1 4

Comment noted. The Presidio Trust appreciates the commentor's perspective of key points of the Planning Guidelines, which do not, however, purport to reflect the full content of the Guidelines.

4 4 - 1 5

It is the Presidio Trust's opinion, as documented in the EIS, that the preferred alternative is largely consistent with the Planning Guidelines. The text of Sections 4.1.8 through 4.6.8 (Cultural Resources) of the Final EIS has been expanded to address in further detail inconsistencies between the alternatives and the Planning Guidelines. Future

planning and design review processes would strive for greater compliance with the Planning Guidelines to reduce these effects (please refer to mitigation measure CR-1, *Planning and Design Guidelines*, and to master response 7B; also, see master response 7A for discussion about the Planning Guidelines). With regard to the identification of Alternative 5 as the preferred alternative, please see Section 2.1, Development of Alternatives, of the Final EIS, where text has been expanded to further describe this process.

4 4 - 1 6

In response to the two substantive comments made, the preferred alternative must be seen in the context of the 23 acres it occupies together with the activities on the other 37 acres of the Letterman Complex, and consideration must be given to the proposal to set aside almost one-third of the 23 acres as a public park to which the public is invited. Master response 7A discusses the ways in which the preferred alternative is consistent with the Planning Guidelines. It is consistent with the GMPA in that no housing is proposed for construction within the Letterman Complex; rather, the housing needs generated through the new uses at the Letterman Complex would be accommodated elsewhere, within existing housing stock at the Presidio. There is no requirement that new uses at the Letterman Complex be associated with past uses of the Letterman Complex. However, text has been added to the Final EIS within the description of alternatives that outlines the activities and programs that would be carried out, including interpretation about the site's history.

4 4 - 1 7

The Planning Guidelines provide a framework for planning for the entire 60-acre complex, not just the 23-acre site of development proposed under Alternative 5. Excerpted text from the Planning Guidelines in this comment would apply to the entire complex. Additional text has been added to the Final EIS to describe and analyze the effects on the visitor experience for the Letterman Complex undertaking, including the preferred alternative. Please refer to master responses 7A and 25.

4 4 - 1 8

Additional text has been added to Section 2.7 of the Final EIS to describe in more detail the public-oriented uses under Alternative 5 that are accessible from the Letterman Drive entryway. The main visitor lobby, accessed from Letterman Drive, would include interpretive materials related to the Letterman Complex history. Screening and meeting rooms would be located near this entrance which would periodically be made available to the public. Please refer to master response 25 for further discussion.

4 4 - 1 9

Alternative 5 includes the creation of a significant new open space, a 7-acre Great Lawn, within the Letterman Complex. The details of the O'Reilly Avenue commons and the Great Lawn would be developed in the design phase of the project (see master response 25).

4 4 - 2 0

Alternative 5 proposes built facilities along the Gorgas Avenue streetscape that include a public café as well as common facilities, in addition to the Great Lawn where activities and events could occur. This fulfills the Planning Guideline's objective for an active, event-oriented edge with recreational, retail, and cultural program uses (see master response 25).

4 4 - 2 1

Master response 25 addresses this topic. Also, text has been added to the Final EIS to describe the visitor experience at the Letterman Complex for each of the alternatives. Text has also been added to the Affected Environment of the Final EIS to describe current plans and activities underway for Presidio-wide interpretation. In addition to programs and activities brought forward by tenants, the NPS is responsible, per the Presidio Trust Act, to provide interpretive



services for the Presidio in cooperation with the Presidio Trust and would be engaged in developing programs for the Letterman Complex.

4 4 - 2 2

Comment noted. Please refer to master response 25.

4 4 - 2 3

The Presidio Trust disagrees with the assertion that most of the open space in Alternative 5 is concentrated in courtyards. Alternative 5 provides for 15 acres of open space, of which the largest area would be a 7-acre Great Lawn open and accessible to the public from the east (a new pedestrian entrance from Chestnut Street), from the south through two passages between the buildings, as well as from the north edge. In addition, an open space buffer is retained along the south edge of the 23-acre site, near Letterman Drive as well as the O'Reilly Avenue commons. These public, open spaces, in addition to the enclosed courtyards are consistent with the Planning Guidelines' recommendation for a network of open spaces throughout the complex as well as for "buildings clustered around courtyards and intimate outdoor spaces" (Appendix B, 3.5.2D).

4 4 - 2 4

Refer to master response 16.

4 4 - 2 5

Refer to master response 15.

4 4 - 2 6

The proposed buildings in Alternative 5 would be of varying height and scale to avoid a sense of "blockiness." Additional text has been added to the Environmental Consequences section for Alternative 5 to address the inconsistencies between the alternative and the Planning Guidelines. Please refer to master response 23. The design review process would further address this concern through the application of Planning Guidelines and subsequent Design Guidelines for new construction to address issues of massing, scale, and orientation. Please refer to master response 7A and response to comment 33-6.

4 4 - 2 7

The Trust disagrees with the commentors' assertions. Please refer to response to comment 44-23.

4 4 - 2 8

For clarification, the excerpted Planning Guidelines text refers to the section to "Consider the character of historic water features – small interior courtyard fountains and the surface runnels – in the design of new water features." Alternative 5 proposes the development of a lagoon at the northeast corner of the site, where historically there once was a tidal marsh area. The lagoon is a historical symbol or reminder of the past land use of this site. Furthermore, this design feature would fulfill sustainability goals for the site through onsite management of storm water. Attention to additional water features, such as the use of fountains and historic runnels, would be addressed in the future during conceptual plan refinement and design development. Also, it should be noted that the Planning Guidelines are applicable to the entire 60-acre Letterman Complex and rehabilitation and reuse of the historic runnels may be more successfully accomplished elsewhere within the complex, subject to additional analysis.

4 4 - 2 9

Please refer to master responses 23 and 24 for a discussion on effects on the historic setting and views. In the Final EIS, additional analysis has been provided for each alternative for visual impacts. The analysis is supplemented by Figures 20 through 24 that illustrate topics covered in the new text and to aid reviewers in evaluating view impacts.

4 4 - 3 0

See master responses 7A, 23, and 24.

4 4 - 3 1

The site plan for Alternative 5 proposes preservation of the open landscaped space at the south edge of the 23-acre site, near Letterman Drive. In addition, the site plan designates the south edges of the built complex to be the arrival/drop off and visitor area, with most of the public amenities located along the Great Lawn's building faces, which would be consistent with the intent of the Planning Guidelines. Refinement of building uses, and their specific location within the 900,000-square-foot footprint would occur during the design development phase.

4 4 - 3 2

A discussion of the preferred alternative's impact on the O'Reilly Avenue edge can be found in master response 23. Additional text has been added to Section 4.5.8.1 explaining that the "impenetrable" edge along O'Reilly Avenue would be a subject of ongoing negotiations during the design development and review process to avoid this adverse effect on the adjacent historic structures. The Planning Guidelines would be applied through consultation under the Programmatic Agreement and the design review process, which would involve input from the ACHP, the SHPO, NPS, and the public.

4 4 - 3 3

Please see response to comment 44-20. The Presidio Trust disagrees with the assertion that Gorgas Avenue would be an amorphous, pastoral edge.

4 4 - 3 4

The reference to jobs/housing balance in the Planning Guidelines is in the context of design principles for access, circulation, and parking. Currently, 1,304 units of housing are available elsewhere at the Presidio, a portion of which would be used to accommodate employees of a Digital Arts Center. It should be noted that neither the Army nor the UCSF proposal had housing on the 23 acres.

4 4 - 3 5

The Digital Arts Center would be required to fully participate in an active TDM program which would include mitigation monitoring and other measures specified in mitigation measure TR-8 that are designed to reduce usage of automobiles at the Letterman Complex (see master response 20).

4 4 - 3 6

The Presidio Trust disagrees with the assertion that linkages to the Presidio and rest of the Letterman Complex are weak (see master response 25).

4 4 - 3 7

Please refer to mitigation measure CR-1, *Planning and Design Guidelines*, and master response 7B. Elements of architectural scale, massing, orientation, and color would be addressed in the design development process for this undertaking. New construction would be sited and designed to reinforce historic patterns of development on the site and would be more compatible with the historic setting in scale and massing than the existing LAMC and LAIR facilities.

4 4 - 3 8

For response to the comment concerning the conformity of alternatives to the Planning Guidelines and the effect of bringing the proposals into conformity with the Planning Guidelines, refer to master responses 7A and 7B. For response to the comment concerning the scope of alternatives, refer to master response 6A, and concerning identification of the preferred alternative, refer to Section 2.1.3 of the Final EIS.

4 4 - 3 9

For a response to the comment concerning the Trust's tiering to the GMPA EIS, refer to master response 1D; concerning missing sections addressing the Trust's vision for the park as a whole and its financial plan, refer to master responses 4A and 5; concerning a lack of any discussion of the natural resources at the site, refer to master response 16; concerning the range of alternatives, refer to master response 6A; refer to master responses 24, 4B, 20, 18, 14 and 13 regarding the analysis of impacts on the visitor experience, the park as a whole, parking, traffic, sewer and water usage, respectively; regarding the reliance on mitigation measures, refer to master response 12; concerning the cumulative impact analysis, refer to master response 4B; and concerning the Trust's decision-making process and its requirements under NEPA, refer to master response 1B.

4 4 - 4 0

Please refer to master response 1D, and to Section 1.2, Underlying Purpose and Need within the Final EIS. For further response to comment concerning the 23- versus 60-acre site and for response to comment in footnote 16, refer to master response 4A. See also master response 6A.

4 4 - 4 1

Concerning information on trees, wildlife resources and birds, refer to master response 16. Concerning the hydrology of the area and drainage patterns, refer to master response 15.

4 4 - 4 2

The commentors are referred to Section Y, Human Health, Safety and the Environment in Appendix A of the EIS for an analysis of the impacts related to the cleanup of hazardous substances, pollutants, and contaminants at the 23-acre site. The analysis identified mitigation measures, including asbestos remediation, lead-based paint abatement and contingency planning, that would be imposed upon the project to reduce impacts due to potential contamination at the site. Those measures appear in the main body (Section 4.7) of the EIS.

4 4 - 4 3

For response to the comment concerning the Trust's compliance with the GMPA and the need for a comprehensive plan for the Presidio, refer to master responses 2A, 3B, and 4A; and concerning the public availability of the Trust's financial plan and assumptions, refer to master responses 5, 10A, and 10B.

4 4 - 4 4

For response to the comment concerning the adequacy of the range of alternatives considered by the Trust, refer to master response 6A (see also Sections 2.1 and 2.2 of the EIS). For response to comment concerning conformance of the alternatives to meet the Planning Guidelines, refer to master response 7A.

The Trust had a number of rational bases for focusing its development alternatives to 900,000 square feet on the 23-acre site. Please refer to master response 6A and Section 1.2 of the Final EIS, where text has been expanded on these issues.

It is not accurate to say that none of the alternatives contemplate a lower density level on the 23-acre site. In fact, Alternative 1, which proposes spreading the 503,000 square feet of building density throughout the 60-acre complex, is included and analyzed as one of six alternatives. This alternative provides an important baseline to show the effects of spreading the density across the complex as compared to retaining the entire development within the 23-acre site.

For response to comment on confusing press statements concerning the selection of alternatives, refer to master response 6B.

4 4 - 4 5

The Presidio Trust disagrees with the commentors' opinion that key assessments in the EIS are lacking. For discussion of the assessments of impacts on other parts of the park, refer to the cumulative impacts analyses provided for each alternative in Sections 4.1.11 through 4.6.11 of the Final EIS and to master response 4B. Concerning an assessment of project impacts on natural resources including trees and wildlife, refer to master response 16. Concerning an assessment of project impacts on the visitor experience, refer to master response 25. Concerning an assessment of visual impacts, refer to master response 25.

4 4 - 4 6

With regard to parking and traffic issues, refer to responses to comments 44-47 through 44-52, below. Regarding water and sewer capacity issues, refer to master responses 13 and 14, respectively.

4 4 - 4 7

The land use associated with Letterman Digital Arts was considered to be "research and development" because the proposed number of employees compared with the proposed square feet of replacement construction is consistent with the employee densities typically noted for research and development facilities. The *ITE Trip Generation Manual* (Institution of Transportation Engineers 1991 and 1997) indicates an average employee density of 342 square feet per employee for research and development uses, and between 301 and 313 square feet for various types of office uses. Because Letterman Digital Arts proposes a total of 2,500 employees for the 900,000 square feet of facilities, the average employee density of 360 square feet per employee is more consistent with the lower density typically found for research and development facilities than for office space.

4 4 - 4 8

The average vehicle occupancy of 1.4 persons per vehicle, as obtained from the Citywide Travel Behavior Survey, is for San Francisco Superdistrict 2. Superdistricts are travel analysis zones established by the Metropolitan Transportation Commission (MTC) and provide a basis for geographic subareas in the City of San Francisco. Superdistrict 2 is generally bounded by the Pacific Ocean, Golden Gate Park, Van Ness Avenue, Townsend Street, and the Marina.

The average vehicle occupancy of 1.4 persons per vehicle is for all trips destined to or leaving Superdistrict 2, and accounts for trips that originate and end within San Francisco, as well as in the North Bay, South Bay, East Bay and other out of the Bay Area origins (and not just those with a San Francisco origin or destination).

4 4 - 4 9

An explanation of parking demand was contained in Appendix D in the Draft EIS. Also, see master response 20. Parking for the proposed development could not be accommodated in existing spaces because, even though there are currently 13,000 spaces in the Presidio overall, only 585 vacant spaces are located on the 23-acre site and parking on adjacent sites is very limited. Also note that although the park currently has 13,000 parking spaces, the GMPA calls for a reduction to approximately 8,400 spaces.

4 4 - 5 0

Typically, offices and research and development centers generate peak-hour traffic volumes that are approximately 10 percent of the total daily traffic generated, as illustrated in Table D-1 on page D-3. Because many of the trips generated by employment centers are visitor trips, a large proportion of trips do not occur during the peak commute periods. In addition, employee-generated traffic is generally distributed over a 2-hour peak period. In order to provide a conservative analysis of traffic conditions, the peak hours of the 2-hour peak periods were evaluated for the EIS. The traffic volumes shown in Table D-3 on page D-5 correspond to estimated traffic during the p.m. peak hour, and not the p.m. peak period.



Traffic that would be traveling to and from other parts of the Presidio was incorporated into the traffic impact analysis. Traffic that is currently traveling to and from other parts of the Presidio is accounted for in the traffic counts conducted in January 1999. Traffic that is forecasted to be traveling to and from other parts of the Presidio in the future was estimated in the GMPA EIS. The future intersection traffic volumes assumed in the Draft EIS were based on the sum of these forecasted traffic volumes as well as traffic that would be traveling to and from the 23-acre site.

The levels of service shown in Table 18 of the Final EIS reflect year 2010 conditions and consider the traffic traveling to and from the 23-acre site, traffic traveling to and from other parts of the Presidio, and traffic traveling through these intersections to other destinations outside the Presidio.

The Presidio Trust would need approval from Caltrans to construct the proposed intersections on Richardson Avenue. If these intersections were not constructed, the project-related impacts at other Presidio gates (primarily the Lombard Street Gate) would be substantially greater.

44-51

See master response 20.

44-52

With regard to impacts on the historic buildings and streetscapes, the effects of proposed intersection improvements on the historic setting are analyzed in Sections 4.1.8.3, 4.2.8.5 through 4.5.8.5, and 4.6.8.3 of the EIS. Additional text has been included to address these concerns raised. In addition, please see master response 22. See master response 23.

44-53 AND 44-54

Refer to master responses 12, 13, and 15.

44-55

Please see master response 4B.

44-56

For response to the comment concerning the Trust's actions with respect to selection of its preferred alternative, refer to master response 6B and Section 5.2 of the Final EIS.

44-57

For all of the reasons set forth in the Trust's responses to comments and in the Final EIS itself, the Trust disagrees that a supplement to the Draft EIS is necessary. The EIS has been prepared in full accordance with the requirements of NEPA. Because the EIS meets the standards for an adequate statement under the Act and has enabled meaningful analysis, the Presidio Trust has found no compelling reason to recirculate the Draft EIS.

44-58

Thank you for your letter. The Presidio Trust disagrees with the commentors' opinion that the EIS and the site plan for the 23-acre site are flawed. The Trust acknowledges the import and complexity of its responsibility under the Trust Act to preserve and protect the Presidio as a park while ensuring its financial self-sufficiency. The Trust has made clear that it continues to use the GMPA as the master plan that guides the Trust's decision making. Here, the Trust had a rational and legitimate purpose and need (Section 1.2 of the Final EIS) for proposing, as set forth in this EIS, to implement this 23-acre portion of the GMPA's Letterman Complex plan. It is therefore appropriate and consistent with NEPA to have tiered this EIS off the GMPA EIS. Furthermore, all differences between the GMPA

concept and the purpose and need for this site-specific implementation proposal have been fully and adequately analyzed. Regarding the requested information on the Trust's vision for the park and financial management program, refer to master responses 2A, 3A, 4A, 10A, and 10B. Regarding site-specific information on toxics, wildlife, and watersheds, refer to the response to comment 44-42, and master responses 16 and 15, respectively. The range of alternatives considered in the EIS are reasonable in light of the stated objectives of the Presidio Trust, as discussed in master response 6A. Concerning assumptions regarding water usage, parking and traffic, refer to master responses 13, 20 and 18, respectively. Finally, as discussed in master response 12, all significant adverse effects have been identified, and while there is no requirement under NEPA to do so, as noted in your letter (footnote 21), specific mitigation measures have been identified wherever possible and will be adopted as later set forth in the Presidio Trust's final decision on the project.



Letter 45

Comment on the Letterman EIS/Lease Proposal

The choice to negotiate exclusively with Letterman Digital Arts for the redevelopment of the Letterman site is a mistake which could lead inexorably to the perversion of a national treasure.

The mandate to preserve the cultural and natural resources of the Presidio by means of revenue generated within the park is a daunting one. But with 800 structures which can be re-used, and a wealth of opportunities for indoor and outdoor activities for which people are willing to pay, the need to build a new 900,000 sq. ft complex to house what amounts to one corporation has not been adequately demonstrated.

In the course of its two years of existence, we have seen the Trust change its course and veer from the path set by the General Management Plan Amendment (GMPA) for the Presidio. This plan was developed in a very public process facilitated by the National Park Service, and its final form was an amendment to the GMP for the Golden Gate National Recreation Area, of which the Presidio has become a part.

Initial statements by the Trust reflected a desire to choose tenants on the basis of how well their activities fit into and enhanced the national park. An innovative “balance” between more well-heeled tenants and more appropriate (i.e. educational, environmental, social) tenants was touted as a way to reach the 2013 goal of a self-sufficient national park.

More recently we’ve heard self-confident predictions from the Executive Director and staff members that the Trust will turn a profit well before the deadline, and then will go about helping idealistic non-profits set up shop in the Presidio. The Presidio must remain public land, a repository of history, a habitat for endangered species, and a place where people come together as equals to grapple with 21st century problems. When the profit motive dominates, even for an instant, the integrity of this centuries-old shrine of nature and society is compromised.

This proposed construction is too large for this national park. The proposed digital activities bear scant resemblance to real human and human-nature interactions for which parks are needed. The process by which this choice was made involved too much bottom-line and too little creativity and time. The Presidio, has for centuries welcomed, inspired, protected, and in some cases dominated people of the nation and the world. Don’t let it be dominated by private interests.

James Osborne
194 Academy Lane
Sonoma, CA 95476-4350

45-1



Response to Comment in Letter 45

4 5 - 1

Thank you for your letter. The commentor's objections are noted for the record. Please refer to Sections 1.1 and 1.2 of the Final EIS for a discussion of the background and need for the project. Please also see master response 2A.



Letter 46

Sierra Club Presidio Committee

1474 Sacramento Street, #305
San Francisco, CA 94109
August 2, 1999

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

1999 SEP -2 PM 3:26
PRESIDIO TRUST REC'D

Dear Sirs:

The Sierra Club has reviewed the document created by the Presidio Trust entitled "Draft Environmental Impact Statement and Planning Guideline for the New Development and Uses within the Letterman Complex."

We have found the DEIS to be inadequate. It does not provide information required for the public to make an informed decision on the impact of the proposed Letterman site development on the environment of the Presidio. This includes the impact on parking and transportation, housing, trees and wildlife, and water and sewer services. Some elements of the DEIS are either missing or left so vague as to make a thorough assessment of cumulative environmental impacts for each of the five alternatives impossible.

46-1

Additionally, it is impossible to evaluate the cumulative environmental impacts of the Letterman alternatives without any knowledge of what is planned for such other large scale projects as the Public Health Hospital site, Ft. Winfield Scott and existing buildings across the 1,500 acre Presidio site.

Summary of conclusions

The DEIS does not provide appropriate alternatives or sufficient information for the public to make an informed judgment on development for the Letterman site. The Sierra Club concludes that no contract should be awarded for building at Letterman or elsewhere in the Park until the DEIS is amended to include the following:

- A parkwide transportation plan.
- A parkwide analysis of housing options, including environmental impacts, financial costs and returns.
- A parkwide financial analysis of the Trust including alternative financial models requiring less commercial development.
- Full analysis of impacts of development at the Letterman site on wildlife, trees, and sewer and water services

46-2



Transportation and Parking

The DEIS lacks a transportation plan for the entire Presidio National Park. The problems that this deficiency creates can be seen in the proposed parking structure of the preferred alternative for the Letterman complex. For instance, the proposed underground garage is much larger than required by this complex, but smaller than one typically provided for a suburban office campus. Taken together, these facts will impact transit and parking in the entire Presidio.

46-3

The garage is of a size that will encourage driving and does not help the Trust "to create models of environmental sustainability." Because it will not meet the employees' demands, many employees will seek to park elsewhere in the Park. Even though the Park is relatively small, the Trust will need a complete transportation plan for the entire Park to deal with the parking imbalances at Letterman.

46-4

The Presidio Trust and the National Park Service should work with Muni and Golden Gate Transit to improve transit service to the Park. Golden Gate Transit and Muni should have a transit stop inside the Park near the proposed project. Golden Gate Transit should use some of their buses which run outbound nearly empty to provide near express service from the regional and major Muni transit stations downtown. In addition the employers and the Park should work together to organize van service from the region and from locations in the City. Muni and Golden Gate Transit will have to provide off peak and late night service to allow people to use reliable transit during peak hours and also have service available to use after the peak.

46-5

The developer should build a much smaller garage and reduce the traffic count near the site. We suggest that the downtown San Francisco maximum allowable parking should be used for this site. The San Francisco maximum is about 0.2 parking spaces per thousand square feet. For a 900,000 square foot office the City would allow 180 spaces. This will also substantially decrease the construction cost of the office buildings and increase ground lease payments to the Trust.

Our suggestion is based on following:

- a) The 50% of employees will live in the Park and walk, bike or take a Park shuttle to work.
- b) That 30% of the non-Park resident employees will walk, bike or take improved mass transit to work (similar to 50% of San Francisco workers).
- c) There are three employees per 1,000 square feet.
- d) If all of the remaining employees take a van with ten passengers (vans typically hold 14 people), the required number of van parking spaces is: (2,500 employees) (0.5 residents) (0.7 non residents) (0.1 vans/employee) = 88 spaces required.

46-6

The remainder of the allowed 180 spaces (92) should be ample for visitors and emergencies.

Whether this small garage or the large garage as proposed is built at Letterman, the Trust should adopt policies to reduce commuter parking in the nearby parking spaces within the



Park. The Sierra Club urges the Trust and NPS to use high hourly parking rates for employees and visitors to transfer demand from autos to transit and to employee van service. The surrounding neighborhood can make use of the City's residential parking permit system to restrict commuters from parking on their streets.

46-6

If the Trust makes the entire Park a model of sustainability in the transportation area, the income from parking fees will be large enough to allow a reduced level of commercial activity. Parking fees at the Presidio, now charged in all state park facilities, will substitute for the absence of entry fees, a feature of all National Parks.

46-7

Size of the Development and a Financial Plan

The trust has not provided the public with a financial analysis of the Presidio. Because of this, the public has no way of judging how many square feet of development is really required for the preferred alternative or the other alternatives in relation to the overall area of development required for the entire Park.

The Trust estimates that it will need income of \$ 36 million in 2013, but the Presidio will be a better park, environmentally and in other ways, if it is possible to reduce the amount of commercial development. To determine whether commercial development can be reduced, it is necessary to consider the financial operation of the park as a whole. A high priority is to reduce non-residential commercial uses, at Letterman, the PHS site and Ft. Winfield Scott.

Reduction of commercial activity will reduce revenues to the Trust and it will be necessary to identify cost savings to adjust for the lower level of revenues. We have shown above (in our discussion of parking) that there are other possible areas of revenues that could be explored.

46-8

This economic analysis should begin with an examination of the level of activity, or building space options, at Letterman. We propose examining reductions of \$1 million and \$2 million from the proposed \$5 million in expected revenue from the 900,000 sq ft buildout; this implies developments of approximately 720,000 sq ft and 540,000 sq ft respectively. It may be with full disclosure, analysis and review, that the Sierra Club and the public may favor full 900,000 sq ft use at Letterman. It may not.

While the DEIS does examine the 500,000 sq ft alternative 1 for an office complex and rejects it for a number of reasons, including financial, the DEIS does not advise the public of what cuts in services throughout the park would occur if this reduction in size and revenue were to occur. The relative size of the reduction would be \$2 million, or 5% of total receipts.

If the reduction in scale was to 720,000 for Letterman, and \$1 million in Trust receipts, that would mean a reduction of 2.5% in total receipts to the Park. The analysis of effects on the park's activities affected by that level of reduction in expenditures needs to be spelled out for the public.



Perhaps the Trust has no option other than a 900,000 sq. feet buildout, since any reduction in Letterman might mean not achieving self sufficiency. But it is possible that a reduction can be absorbed by lowering the level of operating costs or improvement expenses.

We hope that the Trust, with its large income base, can achieve a balance between commercial and non-commercial use and still provide the minimum operating and improvement budget consistent with long term goals.

The framework for financial and environmental analysis is the park as a whole, not just the Letterman area, since receipts to the Trust are used for the entire park.

46-8

Housing

The Trust has rejected the alternatives for Letterman that would have provided housing in addition to other facilities. The Trust has stated that it plans on providing an additional 500 units somewhere in the built up area of the Park.

The Trust may have made the right decision, but the public has no way of judging whether this is so. The Trust has not provided the public with the specifics as to the location, cost, and impacts of the unspecified housing options to the Letterman site. The public cannot reasonably be expected to voice an opinion on the relative merits of housing at the Letterman site vs. other sites.

Providing the housing at locations in the Presidio near employment centers—such as building new housing at Letterman—would reduce intra-Presidio traffic, and require less intense intra-Presidio transit. However, it is also possible that building new housing at Letterman would intensify the traffic problem at the Lombard Gate, and that building at existing housing communities would disperse the traffic impacts. Without an housing analysis, there is no way for the public to judge between the two possible effects.

46-9

Even if there is no housing at the Letterman site, as the preferred alternative proposes, the lack of a housing plan for the entire park still affects decisions made about the Letterman site. For instance, converting existing 4 bedroom duplexes to 2 bedroom units could increase the number of units at least cost, providing maximum housing availability for the anticipated Presidio workforce. By reducing the amount of new investment, it would increase ground rent paid to the Trust, reducing the need for funds from other sources, including Letterman office space. Without a parkwide analysis of housing, the public has no way judging.

And finally, without an overall Park housing plan, the public has no way of judging the Trust's figure of 500 units in the built up area of the Park. Providing additional housing in the Presidio may be necessary to achieve the 2:1 jobs/housing balance called for in the General Management Plan, avoiding the need for more commuting to jobs.

The Trust should not proceed with awarding a contract for the Letterman site without a full and complete housing plan for the entire Presidio, for review with the public.



Trees and Wildlife

The public expects and the law requires an environmental impact statement to describe the impact of a project on the natural environment. The Letterman DEIS does not do this. It provides no information on the mature trees or wildlife, nor is there any discussion on how each of the five alternative proposals would impact trees and wildlife. Given this, DEIS does not provide the information required for the public to determine the impact of each of the five alternatives on the natural resources of the area.

In Appendix B, Planning Guidelines of the DEIS, it states that the natural landscape guidelines are intended to protect, preserve, and enhance” natural features that include “existing mature trees,” and the “wildlife habitat areas which occur in association with these existing trees.” Unfortunately, the DEIS doesn’t follow it’s own guidelines.

46-10

The DEIS discussions of the affected environment (Section 3) and the alternatives don’t provide any information about the mature trees in the area. It doesn’t list the numbers, sizes, or species of trees, or their condition or age. It doesn’t give an estimate of how many would be removed or protected and preserved, as the appendix sets as a guideline. It doesn’t mention the effect on wildlife of removing the trees. Nor does the description of the affected environment provide any information about the species of birds that are known to nest and feed in the area of the Letterman complex. Bird species known to be in the area include red shoulder hawk, barn and tree swallow, quail, and cardinals.

Storm Drainage: Non-Point Source Pollution

Section 2.6.4 Storm Drainage (page 36) is one example of omitted or vague data. It says: “A storm Water Pollution Prevention Plan (SWPPP) would be developed to assist the Presidio Trust and its tenants in complying with the National Pollution Discharge Elimination System (NPDES) storm water requirements set forth in the Clean Water Act, and other applicable requirements.”

46-11

This is vague and lacks necessary details. Instead of “would be developed,” the DEIS should tell by what process this would be achieved and when this would occur. Non-point source pollution is the largest contributor of pollution to the San Francisco Bay. The SWPPP needs to have been already formulated and available to the public so that it can evaluate the cumulative environmental impacts of each of the DEIS alternatives (1 through 5).

Water Supply

The DEIS states that Letterman Complex will use all the potable and nonpotable water available in the Presidio, and may exceed it. For instance on, pages 53 and A-6, the DEIS states that the City of San Francisco will supply the needed water that cannot be obtained from Lobos Creek. It states a possible need of 10,000 gallons a day from the City.

46-12

However, Section 3.5.2 (page 54) states that “Lobos Creek will be unable to meet” the Presidio high-use and reduced demand assumptions “and still maintain the 0.5 mgd minimum flow of water in Lobos Creek.”



With Letterman using all of the water available in the Presidio or exceeding it, this implies the rest of the 1,500 acre Presidio, including the Public Health Hospital site and existing buildings and landscaping, will get its water from the City of San Francisco. This could be an enormous amount, and nothing in the DEIS suggests that the City of San Francisco actually has the capacity.

The DEIS mentions planning for “water conservation measures” (page 54), but doesn’t estimate how much this could save. In addition, volunteer conservation measures cannot be assumed to effectively mitigate excess water demands.

46-12

An environmentally sustainable model of the new office building should include a *gray water* system to recycle gray water for toilet flushing to reduce the demand for potable water and sewage treatment capacity. (The City is currently planning to use recycled water.)

Sewer Capacity

The problems with the DEIS statements on sewer capacity are similar to those with water capacity. The DEIS states that the City’s Southeast Water Pollution Control Plant will handle letterman’s sewage (page A-7). As with the analysis for water supply, the sewer analysis doesn’t mention how the requirements for the Letterman Complex relates to the requirements of the Presidio as a whole.

46-13

Summary

The DEIS does not provide appropriate alternatives or sufficient information for the public to make an informed judgment on development for the Letterman site. The Sierra Club concludes that no contract should be awarded for building at Letterman or elsewhere in the Park until the DEIS is amended to include the following:

- A parkwide transportation plan.
- A parkwide analysis of housing options, including environmental impacts, financial costs and returns.
- A parkwide financial analysis of the Trust including alternative financial models requiring less commercial development.
- Full analysis and information of impacts of development at the Letterman site on wildlife, mature trees, and sewer and water services

46-14

Sincerely,


Rebecca Evans
Sierra Club Presidio Committee



Responses to Comments in Letter 46

4 6 - 1

Thank you for your letter. The Presidio Trust disagrees with the commentor's opinion that the EIS is inadequate. The EIS has been prepared in full accordance with the policies and purposes of NEPA. The analysis of impacts requested in the commentor's letter are addressed in the Final EIS, and the responses to comments 46-3 through 46-13 below address each impact individually. With regard to cumulative impacts, please refer to master response 4B.

4 6 - 2

The conclusions summarized in this comment letter are addressed in detail in the responses to comments 46-3 through 46-13.

4 6 - 3 A N D 4 6 - 4

Refer to master response 20.

4 6 - 5

The Presidio Trust's Transportation Manager meets regularly with both MUNI and Golden Gate Transit with the goal of improving transit service to the park. Current and proposed relocated Golden Gate Transit and MUNI #28 stops are on Richardson Avenue, within 400 feet walking distance of the site. Stops for MUNI #43 and #82X are within 100 feet walking distance of the site. Current stops for MUNI #41 and #45 routes are on Lyon Street within 800 feet walking distance of the site. Extension of the #41 and #45 trolleycoach lines into the Presidio (giving these routes the same stops as the #43 and #82X) is included among MUNI's long-range capital planning projects.

The Trust planned to contract with Golden Gate Transit for reverse-commute service. The Golden Gate Transit Board approved the contract, subject to concurrence by the city. Concurrence has not yet been granted and so the Trust has been working with MUNI to expand and improve service reliability via the 82X line.

Van service may be part of the park's overall TDM strategy when a larger employee population is present. Vanpool matching and parking preference is part of the development team for Alternative 5's TDM plan.

The Trust will be working with MUNI and Golden Gate Transit to expand non-peak service as the park's employee population grows. A Guaranteed Ride Home program is part of the development team for Alternative 5' TDM plan to accommodate persons who work later than the last bus or their carpool program.

4 6 - 6

The San Francisco Planning Code parking supply standards indicate minimum parking requirements, not maximum parking requirements. The GMPA (page 74) states that "Future Letterman tenants will be required to manage parking to discourage unnecessary automobile use and reduce the potential for overflow parking in adjacent neighborhoods and areas of the Presidio." In an effort to achieve both of these objectives, the EIS assumes trip characteristics that do not substantially underestimate or overestimate parking demand. Because transit service is not and is unlikely to be as available at the Presidio as it is in downtown San Francisco, the proportion of transit trips achieved in downtown San Francisco probably could not be achieved at the Presidio. Therefore, constraining the parking supply cannot be used as readily to promote alternative modes of transportation.

In response to the basis for the suggestions:

- a) Although the Trust has a goal of having 50 percent of park employees living in the park, the Presidio does not contain enough housing to accommodate 50 percent of Letterman employees and still serve other Park employees.



- b) The assumption that 30 percent of non-Presidio employees will take non-transit modes has been made in the EIS.
- c) A factor of three employees per 1,000 square feet was assumed in the EIS.
- d) The commentator's proposed level of vanpooling is very ambitious and, to the knowledge of the EIS preparers, has not been achieved anywhere in the Bay Area.

For a response to the remainder of the comment see master response 20.

4 6 - 7

The revenue from proposed parking fees is intended to fund 1) administration of the parking program, 2) a portion of the park's TDM program, and 3) possible underground parking. It is not currently expected that parking would generate revenue beyond that needed for these functions to help the Trust meet its goal of financial self-sufficiency. Also see master response 18 regarding offsite traffic issues related to the proposed new intersections on Richardson Avenue.

4 6 - 8

Please refer to the Financial Management Program in Appendix E of the Final EIS, and master responses 10A and 10B. See also Sections 1.1 and 1.2 of the Final EIS.

4 6 - 9

As indicated in Section 4.5.5 of the EIS, the additional regional housing demand created by employment associated with the Digital Arts Center from outside the Bay Area would be 481 units. Presidio housing stock (1,116 single-family and multi-family units and 188 units in buildings that formerly served as barracks) would accommodate about 55 percent of this demand. New demand for regional housing would be 216 units, which is less than 0.5 percent of the estimated new housing construction between 2000 and 2010, and less than 1 percent of currently vacant units in the Bay Area. While the development of new housing at the Presidio may be desirable in the future to strengthen the jobs/housing balance at the Presidio, at this time it is speculative, and not essential to mitigate housing impacts from employment associated with a Digital Arts Center. In addition, while a Digital Arts Center does not envision housing on the 23 acres, no housing was contemplated on the same 23 acres in the GMPA.

The Presidio Trust will conduct additional environmental analysis to implement site-specific projects, including the development of a housing management plan, if not already adequately analyzed in the 1994 GMPA EIS. The Presidio Trust intends to initiate a housing study in 2000, with opportunities for public participation.

4 6 - 1 0

Refer to master response 16.

4 6 - 1 1

The commentator is referred to mitigation measure TS-1, *Storm Water Pollution Prevention Plan* in Section 4.7 of the Final EIS for the requested process. Since Section 2.6.4 of the Draft EIS repeats information provided in more detail in the later section, the measure has been deleted from the Final EIS. However, the text of mitigation measure TS-1 has been revised to include the additional detail requested by the commentator. For a discussion of the SWPPP with regard to cumulative impacts, refer to master response 4B.



4 6 - 1 2

First Paragraph – The EIS does not assume that the Letterman Complex would consume all the available water supply at the Presidio. The first sentence of Section 3.5.1 states that, in the past, the Presidio’s water was supplemented by purchases from the city. Section G.1, Water Supply and Distribution in Appendix A of the EIS indicates that the GMPA EIS anticipated that a minimal amount of water from the city would be required under Alternative 1 should water of a purity that is not available from onsite sources be required. The discussion in Appendix A concludes that potable water may not be required from the city to service the Letterman Complex since the LAIR facility would not be considered for health research under Alternatives 2 through 5.

Second Paragraph – The reference to the text is correct but taken out of context. The discussion concluded that the Presidio Trust was pursuing alternative sources of water supply (such as use of reclaimed water for irrigation) as well as reducing water demand through conservation measures in order to fit its water budget.

Third Paragraph – The EIS assumes that the Letterman Complex would be allotted 6.3 percent (88,798 gpd) of the total water available in the Presidio in a typical rainfall year (Table 12 in the Final EIS). The preferred alternative would require slightly less (6.0 percent or 84,574 gpd). With implementation of park-wide water conservation measures identified in mitigation measure WS-2, *Water Supply- and Demand-Side Solutions to Reduce Cumulative Impacts*, and the water reclamation plant in mitigation measure WT-1, the water used within the Presidio would come from onsite sources and would be treated by onsite facilities, and total water consumption would not exceed total water available within the park (see master responses 13 and 14).

Fourth Paragraph – In response to this and other comments, estimated water savings from implementing mitigation measure WS-2, *Water Supply- and Demand-Side Solutions to Reduce Cumulative Impacts* are provided within the measure. The measure would result in a water savings of approximately 120,000 gpd (not including use of reclaimed or purchased water), which would represent approximately 42 percent of the net cumulative peak shortfall of 285,776 gpd (refer to Table 12 in the Final EIS and master response 13).

Fifth Paragraph – Toilet water would be reclaimed for irrigation use, which would have a similar beneficial effect on potable water demand and sewage treatment capacity as recycling gray water. See master response 14.

4 6 - 1 3

The “problems” of water supply and sewer capacity are treated differently in the EIS based on the tiering analysis provided in Sections G.1, *Water Supply and Distribution* and G.2, *Wastewater Treatment and Disposal* in Appendix A of the EIS. The commentor is referred to Sections 4.1.11.2 through 4.6.11.2 (Water Supply) of the Final EIS for a discussion of the relationship between project and park-wide water requirements. A similar discussion on sewer capacity is not required because the tiering analysis in Section G.2, *Wastewater Treatment and Disposal* determined that the Letterman Complex would not result in any additional impacts on sewer capacity that were not previously discussed in the GMPA EIS. It should be noted that the Presidio water reclamation system would reduce those park-wide cumulative impacts that were previously disclosed in the GMPA EIS.

4 6 - 1 4

These concluding remarks are individually addressed in the responses to comments 46-1 through 46-13 above.



Letter 47



Tides Foundation



The Tides Center

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August 2, 1999

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

PRESIDIO TRUST REC'D
AUG 2 1999 3:57

Re: Comments of the Tides Foundation and The Tides Center Regarding the Draft Environmental Impact Statement and Planning Guidelines for New Development and Uses Within the Letterman Complex

Dear NEPA Compliance Coordinator:

This letter constitutes the comments of the Tides Foundation and The Tides Center (Tides) regarding the Draft Environmental Impact Statement ("DEIS") on the proposed development of 23 acres of the Letterman Complex in the Presidio and on the planning guidelines for the entire 60-acre Letterman Complex. For the reasons discussed below, Tides is concerned that the current process for the selection of a project to redevelop the 23-acre site has significantly diverged from the vision and goals of the General Management Plan Amendment ("GMPA"), the general management plan for the Presidio prepared by the National Park Service. This plan, an excellent framework for the conversion of the former military base into a unique and visionary national park, was the result of a careful and thorough public process. We are troubled to find that, in its first major undertaking since assuming responsibility for most of the Presidio, the Presidio Trust appears to have given minimal notice to the vision and goals of the GMPA. Instead, it seems have proposed terms of site redevelopment and selected a project based primarily on economic return, relegating the public's interest in an environmentally-focused, visitor-serving, and integrated national park to a relatively minor consideration.

47-1

Lucasfilm's Digital Arts Center project ("DAC") has been improperly selected well before the close of the public comment period on the DEIS, and the DEIS plainly demonstrates that neither that project nor any of the alternative projects seriously considered fulfills the vision of the GMPA or the sound planning guidelines for the Letterman Complex proposed in this same DEIS. Further, the DEIS has failed in a number of respects to look at the full scope of environmental impacts that the proposed development of 900,000 square feet of replacement structures on the 23-acre project site would have, including its impacts on the Presidio's natural resources and scenic qualities and the cumulative impacts that this project, in concert with other readily foreseeable renovation and reuse projects within the Presidio, would have on the very nature of the Presidio as a part of the Golden Gate National Recreation Area ("GGNRA"). Equally importantly, the DEIS -- and the Trust -- have neglected to look at the negative reverberations that this sort of fiscally-driven



development could have on national parks across the nation.

47-1

Tides Is Committed to the Implementation of the Vision and Goals of the GMPA.

The Tides Foundation and the Tides Center are tenants of the Presidio in the Letterman Complex. However, the concerns we raise in these comments are not those of a neighbor to the proposed development concerned about traffic and other direct impacts that the development could have on our facilities. (This is not to deny the importance of such issues, which have been raised, for example, in the comments of Thoreau Center Partners). Rather, our intent is to address the extent to which the proposed DAC and the alternative development proposals, and the process by which these proposals are being evaluated, depart from the GMPA's vision for the Presidio. We further comment upon the extent to which the DEIS fails to meet the public informational requirements of the National Environmental Policy Act ("NEPA") in failing to recognize the Trust's departure from the GMPA and in other significant respects.

Tides' central concern is that the extraordinary vision of the GMPA be carried out in the planning and decision making for all areas and structures in the Presidio. The GMPA's blueprint for the Presidio as a unique national park promoting environmental sustainability and creative solutions to issues confronting humanity globally was the magnet that drew Tides to the Presidio.

The Presidio of San Francisco...will pioneer a new role for a national park by creating a global center dedicated to addressing the world's most critical environmental, social, and cultural challenges.

*The Presidio's new role symbolizes the swords-into-plowshares concept... The transformation [from military base to park] is inspired by a newly emerging definition of protection -- the one that recognizes that security is no longer based solely on political and military strength, but on *stewardship of the world's human and physical resources through global cooperation.**

47-2

Long the guardian of the Golden Gate, the Presidio now stands ready to house a network of national and international organizations devoted to improving human and natural environments and addressing our common future. The site will be used as a working laboratory to create models of environmental sustainability that can be transferred to communities worldwide.

--Final General Management Plan Amendment (emphasis added)

These notions are reinforced and refined by overall goals for the Presidio presented in the GMPA. For example: "The Presidio will be a dynamic setting for a network of institutions devoted to the stimulating understanding of and action on the world's most critical social, cultural and environmental problems." "The Presidio will be a lively and active community. The site will be used to create models of environmental sustainability, perfecting practices and technology that can be transferred to communities worldwide." "An environmentally responsible transportation strategy will be implemented to minimize private automobile use and increase the availability of public transit, pedestrian, and bicycle travel options." GMPA, Plan Highlights, p.viii. The GMPA goals also emphasize visitor activities, education about the Presidio's history and resources, and preservation and enhancement of the Presidio's historic, cultural, and natural resources. *Id.*



Tides was -- and remains -- excited by this far-sighted approach, the conversion of a spectacularly situated, historically remarkable military base into a national park that would protect and enhance the site's natural and historic resources while renovating the numerous structures on the Presidio to serve as "a global center dedicated to addressing the world's most critical environmental, social, and cultural challenges." We want very much to be a part of the Presidio's community of organizations devoted to environmental improvement and working to create models of environmental sustainability for global dissemination. In our Statement of Qualifications seeking to establish the Thoreau Center, we explicitly stated our desire to participate in the GMPA's vision for the Presidio: "The Thoreau Center will provide a home for a group of research and educational activities focused on the complex and inextricable connections between human society and the natural environment... Promotion of environmental stewardship and sustainability has been a core purpose of Tides since its inception in 1976." At this earliest stage, Tides made clear its commitment that its reuse of the Letterman Complex buildings in which it was interested would "model the application of principles of sustainability in the conversion" of these buildings, thus pioneering a pattern of sustainable practices in the renovation and reuse of the many other structures in the Presidio.

Tides has been quite successful in furthering our original goals. We have been delighted to see other park partners -- as diverse as the Gorbachev Institute, Swords to Plowshares, and the Gulf of the Farallones National Marine Sanctuary -- join the community of organizations that, each in its own way, contribute to the GMPA's lofty goal of "improving human and natural environments and addressing our common future." Naturally, we do not expect any of these organizations to follow the exact model or promote the identical interests of Tides. The genius of the GMPA's vision is that it anticipates the assembly across the Presidio (as in microcosm at the Thoreau Center) of a wide variety of organizations working on issues of environmental and societal improvement and sustainable practices at a variety of levels and from a variety of distinct perspectives. In fact, the cross-pollination of ideas and collaboration on projects of mutual interest among these diverse organizations will be one of the key routes to progress and innovation in addressing the challenges each pursues.

47-2

What we do expect, under the clear direction of the GMPA, is that any major new proposal for use of facilities in the Presidio be judged in significant part on its contribution to the creation of the lively, active community creating models of sustainability and working on "the world's most critical social, cultural and environmental problems" that the Presidio plan envisions. But the Letterman development project under review in the DEIS has not been measured against this standard and offers little of significance to advance the GMPA's principal aims. Instead, the chosen project sets a very low standard for what the Trust is willing to find compatible with the GMPA, conforming in few respects to the vision and goals of that management plan or to the Planning Guidelines for the Letterman Complex presented in the DEIS.

We are reluctant to criticize the actions of our landlord. However, we feel it incumbent upon Tides, as a staunch supporter of the vision and goals of the GMPA, to call the Trust's attention at this first major juncture to its apparent retreat from that vision, perhaps motivated by the pressure to make the Presidio self-funding. It is in this spirit of recalling the Trust to the central vision of the Presidio as a unique national park, dedicated to global problem-solving and the creation and promotion of sustainable systems, that we offer these comments and pledge our continuing cooperative efforts to help bring that vision to full fruition.



The Digital Arts Center project is not consistent with either the vision and goals of the GMPA or the draft Planning Guidelines for the Letterman Complex.

Although the DEIS asserts that the DAC project is consistent with the GMPA, this is not an accurate statement. To reach this conclusion, the Trust reduces the clear guidance of the GMPA to four very general “objectives” which are presented as the only objectives of the GMPA. DEIS, p.6. These “objectives” say no more than: (1) the resources of the Presidio should be preserved and, where appropriate, enhanced; (2) public utilities and policing should be provided in “an environmentally responsible manner;” (3) open space should be increased, development consolidated, and “appropriate” uses approved, particularly uses that involve any of a long, unprioritized list of broad topics (including “research,” “innovation,” and “communication”); and (4) the Presidio should be sustained economically and physically as a great urban national park. Completely missing from the Trust’s identification of “the general objectives of the GMPA” (*id.* (emphasis added)) are any objectives to carry out the GMPA’s primary vision of the Presidio as “a global center dedicated to addressing the world’s most critical environmental, social, and cultural challenges” or as “a working laboratory to create models of environmental sustainability.” As discussed above, these defining elements of what the Presidio is to be as a national park are elaborated upon in the GMPA as among the “highlights” of the plan. GMPA, p.viii. Yet the Trust seems to posit that mere listing of “stewardship and sustainability” among a long, non-exhaustive list of “appropriate uses” in the Presidio is sufficient to capture these key objectives of the GMPA. We believe that the Trust’s identification of general objectives purportedly drawn from the GMPA are of such importance to the future management of the Presidio that these should themselves be submitted for public review and comment.

47-3

It is only by comparing the DAC project to these vague “objectives” that the DEIS can assert that it is consistent with the vision and goals of the GMPA. DEIS, p.161. A look at the proposal shows that it has little to do with the GMPA’s clear objectives to favor uses dedicated to addressing “the world’s most critical environmental, social, and economic challenges” and to creating “models of environmental sustainability.” The Lucasfilm project is essentially a private business use, “an office campus for a single institutional user engaged in research, development and production of digital arts and technologies related to the entertainment industry.” DEIS, p.31. While Lucasfilm is justly renowned for its contributions to advances in high-tech entertainment, its “research” is of a commercial, profit-making nature, and its activities can scarcely be categorized as addressing the most critical global problems or providing models of environmental sustainability.

The DAC is a complex of three four-story office buildings with private courtyards that would employ 2,500 people. DEIS, pp.31-33. It would not provide housing for any of its employees, all of whom would have to commute to the site from their homes; it would provide underground parking for 1,500 vehicles. DEIS, p.33. In creating a use to which employees will have to commute and providing considerable parking, it is inconsistent with the GMPA’s clear objective “to minimize private automobile use and increase the availability of public transit, pedestrian, and bicycle travel options.” While the DAC would provide some minor amenities to the public at large -- a cafe, coffee bar, restrooms -- well over 90% of the 900,000 square feet of new construction would be dedicated to private offices and other business uses. DEIS, p.31. This runs counter to the GMPA’s strong emphasis on visitor activities and access. In sum, the DAC is a private “office campus” for a very lucrative business.



Not only does it lack any clear relationship to the GMPA's vision and real objectives for the Presidio as a national park, but the DAC is also in conflict in a many respects with the sound Planning Guidelines for the Letterman Complex set forth in Appendix B of the DEIS. Without any attempt here to be exhaustive, we simply mention some of the more obvious inconsistencies. The introduction to the Guidelines states that the "key to successful redevelopment" of the Letterman Complex is in "creating a diverse, lively, publicly accessible community." DEIS, p.B-14. By contrast, the DAC is a "single institutional user," almost entirely private business campus. The Guidelines call for projects that "encourage visitors" and "enhance linkages between the Letterman Complex and the rest of the Presidio, and as possible the City." *Id.* The DAC is a self-contained private business complex with little to offer any but the limited visitors who are specialists in digital arts and with no connection to the national park. "Development patterns reminiscent of a[n]...exclusive campus are strongly discouraged." DEIR, p.B-27. The DAC is an exclusive office campus built around a series of private courtyards. The Guidelines call for the promotion of "decrease[d] dependence on automobiles" and "a strong jobs/housing balance" to foster "energy-efficient and sustainable transportation practices." DEIS, p.B-41. The DAC would employ 2,500 people, provide no on-site housing, and offer 1,500 parking spaces.

47-4

In sum, despite the ill-founded assertions of the DEIS that the DAC is consistent with the GMPA, it is plainly in conflict with several of the central tenets of that plan and also inconsistent with the Planning Guidelines the Trust has itself proposed to guide development of the Letterman Complex. As we will discuss below, the handful of other alternatives seriously examined in the DEIS, while perhaps conforming a bit more closely to the Planning Guidelines than does the DAC, are of an identical scale to the DAC and are no more designed to satisfy the vision or overall objectives of the GMPA as the overarching plan for the conversion of the Presidio to a unique national park.

The DEIS fails to examine a reasonable range of true alternatives to the project.

A major problem in the DEIS is its failure to examine a range of alternatives that test the underlying premises of the development action proposed to determine if there are less environmentally disruptive ways to achieve the same basic goal, the redevelopment of the Letterman Complex in a manner that is consistent with the GMPA and contributes to a secure economic future for the Presidio. Unfortunately, the alternatives seriously considered by the Trust (as set forth in Chapter 2 of the DEIS) offer an unduly circumscribed set of options, none of which questions some important and unexamined premises about development at the Letterman Complex.

47-5

With the exception of the No Action alternative, included by requirement of NEPA for comparison purposes and not a seriously considered option, all of the alternatives described assume 900,000 square feet of development on 23 acres of the Letterman Complex. The DEIS maintains, without offering any evidence or analysis, that this level of development is necessary "to generate sufficient revenue to allow the Presidio Trust to achieve financial self-sufficiency by fiscal year 2013." DEIS, p.45. However, nowhere does the DEIS offer any basis for its conclusion that 900,000 square feet of development on 23 acres of the Letterman Complex is necessary to achieve this goal. (See the following section of these comments regarding the lack of sufficient financial information in the DEIS to allow the public to understand and comment informedly upon the merits of the Letterman development proposals.) Given this lack of justification for the narrow range of alternatives examined, the DEIS should include environmentally superior alternatives that propose smaller developments and/or developments that would occur on a different area or



configuration of the 60-acre Letterman Complex. Without such alternatives, it is impossible for the public -- or the decision-makers -- to judge rationally the merits, environmental and otherwise, of the very constrained set of proposals currently presented in the DEIS.

47-5

The financial assumptions that have driven the selection of the DAC proposal are not revealed in the DEIS and must be identified for public information and comment before a final Letterman development project is approved.

As noted above, the DEIS claims that 900,000 square feet of development at the 23-acre Letterman Complex site is necessary "to generate sufficient revenue to allow the Presidio Trust to achieve financial self-sufficiency by fiscal year 2013." DEIS, p.45. However, the public, in reviewing the DEIS and its analyses, is forced to accept this statement on faith, because the DEIS offers no evidentiary or analytical basis whatsoever for the conclusion that this level of development at the Letterman site is essential to the Trust's achieving financial self-sufficiency. Moreover, neither in the DEIS nor elsewhere has the Trust made public its financial plan for the Presidio. Without any notion of what assumptions the Trust is making regarding the level of revenue needed for self-sufficiency, and of where on the Presidio it proposes to raise what proportions of that revenue, it is impossible for members of the public to consider or comment upon the need for or the relative merits of the development proposals presented.

Going a level deeper, why has whatever financial plan under which the Trust is operating never been exposed to public scrutiny and comment itself? Clearly, determinations about the level of revenues that need to be derived from the Presidio to make it self-sufficient have profound environmental consequences for the Presidio, since these determinations will directly drive decisions about the nature and intensity of revenue-generating uses that will be allowed there. Both under the Trust's statutory obligations to seek input from the public throughout its decisionmaking process and its NEPA duties to consider the full environmental implications of its actions before it takes those actions, it is essential that the Trust's financial plan be submitted for public review.

47-6

Only with such review can the public reasonably consider and advise the Trust upon the wisdom of the fiscal course it has charted, with particular attention to the environmental implications of that course. As matters stand, it is unclear whether the Trust has adequately considered all reasonable means of reducing expenses for the rehabilitation and maintenance of the Presidio's structures, infrastructure, and landscapes as an alternative to raising revenues through redevelopments and remunerative reuses at the levels now planned. While we understand that the Trust is under a current obligation to achieve self-sufficiency by 2013, we strongly believe that the process of determining what level of revenue-generating redevelopment and other reuse is necessary to achieving that self-sufficiency for a national park unit is too momentous to take place behind closed doors. Rather, any determination about the measures necessary to secure financial self-sufficiency for the Presidio would benefit greatly from the ideas that would emerge from a broad and thorough public discussion of the Presidio's fiscal needs and the best means of meeting those without impairing its character as a visionary and first-rate national park.

The outcome of such public review and discussion might be the identification of means to achieve self-sufficiency more consistent with the Presidio's park purposes than the current financial plan allows. On the other hand, the outcome might be a widespread public recognition that the Presidio cannot reasonably achieve financial self-sufficiency without compromising too many of its resources and too much of the vision that are necessary to its being a great national park. In the latter case, the public process could serve as a rallying point for returning to a future Congress to modify the terms of the Trust's authorizing



legislation to avoid sacrificing the Presidio's resources and park character to an unrealistic goal of self-sufficiency.

Without detailed information about the financial assumptions that underlie the decision to seek 900,000-square-foot development proposals for the 23-acre Letterman site and to select the Lucasfilm project, assumptions that will also drive determinations on the renovation and reuse of many other facilities in the Presidio, the public cannot effectively participate in the Presidio planning process. While taking the time now to go through this critical exercise with the public may seem untimely to the Trust, facing the 2013 deadline for self-sufficiency, the dangers of not doing so are far greater. If the Trust proceeds on its course of piecemeal reuse decisions for various areas of the Presidio without making clear its overall vision, the likely result will be a major loss of public confidence in the ability of the Trust to manage the Presidio *as a national park* and a consequent loss of public support for the park itself. Simply put, the public is not likely to rally to the defense of the Presidio, or to commit itself to the long-term stewardship of its resources, if significant portions of it are being committed to private, for-profit uses that exclude the public, based on financial decisions that the public has been allowed no role in formulating.

47-6

The selection of the DAC as the successful proposal and the exclusive negotiations with its applicant before the close of public comments on the DEIS violates both the spirit and the letter of NEPA.

The Trust's selection of a successful applicant long before the close of public comment on the DEIS is an indicator of the extent to which the planning process for the Letterman development proposals treats public comment as a formality to be got through rather than an open opportunity for the public to make the final project better from an environmental perspective, as NEPA intends. Arguments that no final determination has been made in the NEPA process are hollow in light of the Trust's announced determination to conduct exclusive negotiations on the final form of Letterman development with Lucasfilm alone. It is not feasible for the public to seriously believe that the Trust will negotiate a final project with Lucasfilm and then select another development alternative as the result of issues raised in comments on the DEIS.

47-7

The DEIS fails to look at the impacts of the Letterman development project on the resources of the Presidio as a whole and to consider its impacts cumulatively with other foreseeable projects throughout the Presidio.

The central purpose of an environmental impact statement is to provide the public a full and fair assessment of the adverse environmental impacts that the project could entail. Yet the Letterman DEIS fails in several significant respects to examine the impacts that the DAC would have by itself and, even more critically, those it would have when considered cumulatively with the other renovation and reuse projects that are necessarily envisioned for many other structures in the Presidio. The DEIS claims to be "tiered" off the analyses in the 1994 EIS on the GMPA, that is, to rely on those analyses as providing basic information about the Letterman project's impacts. However, given that the alternatives under consideration in the DEIS are inconsistent with the vision and goals of the GMPA, differ in site size from the area examined in the GMPA EIS (23 acres versus 60 acres), and make different assumptions about what the project involves (the GMPA assumed that only one of the two Letterman Complex buildings would be demolished), the impact analyses in the GMPA EIS are not directly applicable to the present project. Moreover, even if tiering were appropriate, this EIS, which is on a site-specific project rather than an overall program, should provide more, and more specific, information than did the programmatic GMPA

47-8



EIS. Yet in crucial respects it provides no information at all.

The DEIS's analysis of environmental consequences provides no information on the DAC's or other alternatives' impacts on natural resources on or around the Letterman site. DEIS, Ch. 4. There is simply no information in the DEIS about the vegetation in the project area, or about the wildlife dependent on that vegetation, and, consequently, no analysis of any of the development alternatives' effects on those resources. To give just one example, one of the northernmost coastal breeding populations of the hooded oriole, *Icterus cucullatus*, nests in a group of palm trees on the south side of the site. One searches the DEIS in vain for any mention of this fact, let alone of the impacts of a major demolition and construction project on these trees and birds. Likewise, no analysis is offered of the site's hydrology, or of the alternatives' impacts thereon. This is particularly troublesome with respect to the DAC proposal, which intends to divert stormwater drainage to a "lagoon" water feature on the site, whereas the Planning Guidelines contemplate that stormwater from this area would be directed to restoration of the Tennessee Hollow natural riparian corridor and the restored wetland downstream at Crissy Field. DEIS, pp.31, B-21. The DEIS is also deficient in failing to provide any analysis of the alternatives' visual impacts from other areas of the Presidio, despite the obvious fact that this is a proposal for major new development *inside a national park and within the Presidio National Historic Landmark District*.

47-8

Also lacking in the DEIS is any analysis of the impacts of the Letterman development project when considered cumulatively with the impacts from other reuse, renovation, and redevelopment projects that are foreseeable across the Presidio. Given that the Trust has departed significantly from the goals of the GMPA, drawing from it only four vague "objectives" by which to guide future planning on the Presidio, the analyses in the GMPA EIS, which assumed the achievement of that plan's clear vision, are of very questionable applicability to the Trust's current efforts. The Letterman DEIS should formally examine the cumulative consequences of renovation and redevelopment projects at sites across the Presidio being chosen on the basis of the four vague "objectives" and a policy of achieving high financial returns. This analysis should reveal the cumulative impacts of these developments on the Presidio as a whole and on the larger GGNRA of which the Presidio is a part.

The Trust must be very wary of setting adverse precedents for the management of the National Park System.

The DEIS fails to look at the cumulative consequences of the Trust's process for the approval of development and renovation projects on the Presidio in light of the potentially serious ramifications of the Trust's actions on units of the National Park System nationwide. The Trust was created to address the particular difficulties of converting the Presidio from a military base to a national park, in light of the high costs of rehabilitating and maintaining the site's wealth of historically important but physically deteriorating structures and landscapes. No other park unit in the country is faced with such daunting restoration and maintenance responsibilities (GGNRA's much smaller Fort Baker conversion is perhaps the closest parallel).

47-9

The Trust must be very careful to emphasize the Presidio's unique situation at every opportunity to forestall any argument that its management should be seen as a model for other units of the National Park System. Perhaps the worst thing that could come out of the Presidio planning process is the idea that national parks everywhere should be made to pay their own way through the leasing and development of park resources for commercial and non-park-related uses. Unfortunately, no matter how careful the Trust is to emphasize the uniqueness of its charge, and its inapplicability as a model for other parks, there are those



who will look to and promote the Trust model as one to be applied widely. This is another reason for the Trust to be ever conscious of the potential precedential nature of its actions, decisions, and public process. It is also a compelling reason to place foremost the global-problem-solving, sustainability, and visitor-serving objectives of the GMPA -- goals that serve the *public interest* -- in each and every planning decision the Trust makes. If the Trust steadfastly makes its decisions about uses of the Presidio's resources based firmly on the extent to which these will make a positive contribution to the GMPA's vision of the Presidio as a national park, then concerns about setting negative precedents for other parks will be minimized.

47-9

Conclusion

The public process for the determination of the appropriate redevelopment and reuse of the Letterman Complex has unfortunately gone off the track that it should be on. While it will cause some delay in the short run, it would be far better for the future of the Presidio, and for ensuring the long-term public support essential to sustaining it as a national park, to take a few steps backward and conduct the process properly. Before any choice is made as to the ultimate tenant(s) and uses of the Letterman site:

- The vision and goals of the GMPA to make the Presidio a forum for addressing global problems and fostering sustainability should be acknowledged by the Trust as central to the Presidio's mission as a national park, and all use proposals should be analyzed for their ability to promote that vision.
- All redevelopment proposals for the Letterman Complex should be measured against the Trust's detailed Planning Guidelines for the Complex.
- The DEIS should be revised to include alternatives to the development of 900,000 square feet of structures on the 23-acre site that would allow the public to judge whether a lower level or a different configuration of development on the 60-acre Letterman Complex might better serve the environment of the Presidio as a national park.
- The DEIS should detail the financial assumptions, including the overall financial plan for the Presidio, that led the Trust to conclude that a 900,000-square-foot Letterman development was necessary to achieve financial self-sufficiency for the Presidio, and the Trust should accept and consider public comments regarding the reliability and advisability of the financial plan and assumptions.
- The DEIS should be revised to include site-specific analyses of the proposed Letterman Complex development's impacts on the biological resources of the Complex and surrounding areas, the hydrology of these areas, and the scenic vistas from surrounding areas of the Presidio, and analysis of the cumulative impacts of the Letterman Complex and other foreseeable Presidio renovation and reuse projects on the Presidio as a whole and, more broadly, on GGNRA.

47-10

Only after a revised DEIS that contains all of these features and information has been released and circulated for full public comment, and a final EIS released in response to that comment, will it be appropriate for the Trust to select and approve a Letterman development project.



Like most of the constructive critics of the Letterman development process, Tides wants to see the Trust succeed in implementing the vision of the GMPA for the Presidio and in securing financial self-sufficiency for the Trust, provided the latter goal can be attained without compromising the integrity of the Presidio as a unique national park. As an existing park partner deeply committed to the vision of the GMPA, we want to help the Trust succeed in its challenging mission. But in order for the Trust to succeed, it must gain the faith and support of the broadest possible public by making itself publicly accountable in all its decisions affecting the remarkable public asset entrusted to its care, and by inviting the public fully into its planning for the Presidio at the earliest possible stages.

47-10

Thank you for your attention to our comments. If you have any questions concerning any of the matters we have raised, please do not hesitate to contact me.

Very truly yours,


Drummond Pike
President

cc: GGNRA Advisory Commission
BJ Griffin
Brian O'Neill



Responses to Comments in Letter 47

4 7 - 1

Thank you for your letter. The responses to comments 47-2 through 47-9 below individually address each concern summarized in the comment. Please refer to those responses.

4 7 - 2

The Presidio Trust acknowledges the commentor's commitment to the implementation of the GMPA. The Trust has made clear its commitment to continue to use the GMPA as the foundation for its planning decisions. It is the master document which guides the Trust in decision-making. In some circumstances, as here, changed conditions or additional needs require the Trust to assess critically the best means to implement certain of the GMPA's site-specific plans or programs. Here, the Trust had a rational and legitimate purpose and need (Section 1.2 of the Final EIS) for proposing, as set forth in this EIS, to implement this 23-acre portion of the GMPA's Letterman Complex plan. It is not so substantial a departure from the GMPA as is so often characterized. For further response to the comment concerning the conformity of the Trust's decisions with the GMPA, refer to master responses 2A and 3A. For discussion of the Trust's complete decision-making context and purpose and need for the project as proposed in this EIS, refer to Section 1.2 of the Final EIS.

4 7 - 3

The comment is premised on the notion that each project undertaken by the Trust must singularly accomplish the goal of addressing environmental, social, and economic challenges. Given the complexity of the goal when viewed through the prism of the Trust Act, the GMPA cannot be viewed in such singular dimension. Therefore, for response to the comment concerning the extent of departure from the GMPA, refer to Section 1 of the Final EIS and to master response 2A. For response to comment concerning the inadequacy of the Trust's identification of and compliance with the General Objectives of the GMPA, refer to master responses 3A, 3B, and 3C. For response to the comment about the specific inadequacies of the preferred alternative, refer to response to comment 44-1.

4 7 - 4

For response to the comment concerning the conformity of the preferred alternative to the Planning Guidelines, refer to master responses 7A and 7B. For response to the comment about specific inconsistencies with the Planning Guidelines, please refer to the more exhaustive list and the discussion in response to comments 44-17 through 44-37. With regard to the comment that the preferred alternative's site plan is an exclusive campus, please refer to the responses to comments 44-16 and 44-17. Inconsistencies of each alternative with the Planning Guidelines are discussed in Sections 4.1.1 through 4.6.1 (Consistency with Approved Plans and Policies) in the Final EIS. Please refer to response to comment 33-2 for further discussion. With respect to consistency with the Planning Guidelines, please refer to responses to comments 15-2 and 33-3. For clarification, all of the alternatives in the Final EIS have been analyzed at an equal level of analysis.

4 7 - 5

For response to the comment concerning failure to examine a reasonable range of alternatives, refer to master response 6A. For response to the comment concerning the financial justification for a 900,000-square-foot

development, refer to Section 1.2.2 of the EIS and master responses 5, 10A and 10B. Further discussion of and justification for the range of alternatives selected for analysis is included in Sections 2.1 and 2.2 of the EIS. Consistency of the alternatives to the GMPA is discussed in Sections 4.1.1 through 4.6.1 of the Final EIS. Alternative 1 proposes a smaller footprint for new construction which could occur throughout the 60-acre complex.

47 - 6

For response to the comment concerning the availability of financial information and the financial justification for the project as proposed, please refer to master responses 5 and 10A and 10B and see the Financial Management Program in Appendix E of the Final EIS. In response to the comment concerning piecemealing of its reuse decisions, please refer to master response 4A.

47 - 7

For response to the comment concerning the apparent selection of a developer during the NEPA process, refer to master response 6B and the discussion at Section 5.2 of the Final EIS.

47 - 8

With respect to the comment concerning tiering, as was noted in response to comment 47-2, the Trust has made clear that it continues to use the GMPA as the master plan that guides the Trust's decision-making. Here, the Trust had a rational and legitimate purpose and need (Section 1.2 of the Final EIS) for proposing, as set forth in this EIS, to implement this 23-acre portion of the GMPA's Letterman Complex plan. It is not so substantial a departure from the GMPA as is so often characterized. It is therefore appropriate and consistent with NEPA to have tiered this EIS off the GMPA EIS. Furthermore, all differences between the GMPA concept and the purpose and need for this site-specific implementation proposal have been fully and adequately analyzed. For further discussion concerning the appropriateness of tiering, refer to master response 1D.

Concerning cumulative impacts, refer to master response 4B. Concerning the impacts on natural resources, and in particular, the palm trees and the hooded oriole, refer to master response 16. Concerning the impacts on hydrology, refer to master response 15. Concerning visual impacts, refer to master response 24.

47 - 9

The Trust agrees that the Presidio of San Francisco is a unique site that presents complex and sometimes competing objectives that require unique and innovative management authorities and solutions. For response to comment concerning the precedential effect of the Letterman project on other units of the national park system, refer to master response 8.

47 - 10

These concluding remarks are individually addressed in the responses to comments 47-1 through 47-9 above.

Letter 48

Urban Watershed Project

2532 Lake Street
San Francisco, California 94121
Phone 415.876.1804 Fax 415.876.1805
Email dkern@kernsite.com

August 2, 1999

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

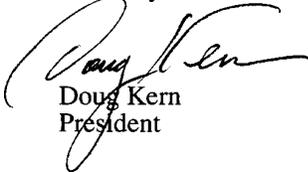
REC'D
PRESIDIO TRUST REC'D
5/10/06

Dear NEPA Compliance Coordinator:

Thank you for the opportunity to comment on the *“Draft Environmental Impact Statement for New Development and Uses within the Letterman Complex; A Supplement to the 1994 General Management Plan Amendment Environmental Impact Statement for the Presidio.”*

Our comments are targeted at potential impacts of the development project on Presidio natural areas, particularly the Crissy Field wetlands and the Tennessee Hollow Riparian corridor restoration project. If you have any questions regarding these comments please contact Doug Kern at (415) 876-1804.

Sincerely,



Doug Kern
President



Comments on Planning Guidelines

- 1 The planning guidelines are a useful and promising addition to the Letterman Complex DEIS. We are very pleased to note the numerous times that the Tennessee Hollow Riparian Corridor restoration project is mentioned in the document and the sensitivity shown the restoration project. Thank you. These considerations are appreciated. 48-1
- 2 Two general comments regarding these guidelines are: 1) it is unclear how they will be implemented and 2) there are apparent inconsistencies in the guidelines with respect to the planning around the Tennessee Hollow Riparian Corridor. 48-2
- 3 Figure B-12 is quite consistent with drawings and ideas submitted to the Trust by the Urban Watershed Project in earlier briefings regarding potential planning for Tennessee Hollow. We include a diagram showing our concept of the Tennessee Hollow planning area near the Letterman site for your review as Exhibit 1. The large arrow in Figure B-12 nicely represents the historical alignment of the creek with a reasonable buffer zone around that creek. However, Figures B-15, B-29 and B-31 show areas for potential building infill. Figure B-29 shows the Tennessee Hollow alignment superimposed over the building infill diagram and the caveat of sensitive treatment along Tennessee Hollow. These are confusing and conflicting messages in these diagrams that give the reader the impression that building infill will take place in the riparian corridor. Building infill in the riparian corridor could dramatically impede future efforts to establish a fully functioning watershed ecosystem with quality habitat supporting native plants and animals, an idea supported by the National Park Service, the Presidio Trust and community members. We strongly urge the Trust to restrict future building infill within the corridor restoration planning area and to plan to remove buildings in the future (such as Buildings 1029 and 1030) when leases expire. We recommend that these restrictions be included in the planning guidelines. 48-3
- 4 Figure B-36 shows a Tennessee Hollow “edge” that is confusing and inconsistent with other Tennessee Hollow diagrams. The drawing should show an “edge”, if an edge is necessary, that is outside the creek alignment and riparian habitat buffer zone. 48-4
- 5 The planning guideline drawings should clarify the status of Building 1029 and 1030. They are often shown in dotted outlines, which may be interpreted as buildings to be demolished. We suggest that demolition is our recommended preferred status of Buildings 1029 and 1030, but understand that these buildings have been leased for a period of 10 years with an option to renew for 10 additional years. We suggest that the document reflect this leased status and reserve the right to remove these buildings at a future date. 48-5
- 6 The diagrams in the planning guidelines do not show Building 230. Building 230 is located north of Buildings 1029 and 1030. This building now houses artifacts retrieved from Crissy Field archeological work. It lies in the Tennessee Hollow Riparian corridor planning area and should probably be included for completeness in all planning guideline diagrams. 48-6



Exhibit 1



Responses to Comments in Letter 48

4 8 - 1

Thank you for your letter. The comment is noted and no further response is warranted.

4 8 - 2

The Planning Guidelines and later Design Guidelines would be used to help shape the final project. To this end, they are intended to provide guidance for projects within the entire 60-acre complex, including those that would occur after the current environmental review process for the 23-acre site is concluded. For example, the Final Planning Guidelines, once incorporated into the Design Guidelines now under development, would be utilized in planning and design for the restoration of Tennessee Hollow. The apparent inconsistencies in the Draft Planning Guidelines noted by the commentor were the result of confusing graphic representations. In response to the comment, the graphics in the Final Planning Guidelines have been amended to help avoid contradictions or inconsistencies. Please see master response 7A.

4 8 - 3

The figures mentioned by the commentor have been changed to remove the references to infill construction. In both the Final EIS and the Planning Guidelines, text changes have also been made to clarify this issue. Infill construction is expected only for Alternative 1 in the Final EIS, and only in those areas indicated in Figure 4. This infill is located in such a way as to avoid impacting the future riparian corridor restoration.

4 8 - 4

The Tennessee Hollow “edge” shown in this diagram is not referring to a building edge, but instead addresses landscape and site treatments that might be planned. The intent of this drawing was to indicate that low-intensity uses are appropriate along Tennessee Hollow with minimal paving.

4 8 - 5

Table C-1 in the Draft EIS identifies buildings 1029 and 1030 as non-historic buildings. The GMPA called for their retention and rehabilitation for dorm-type uses. Any proposals for their demolition would be subject to additional environmental analysis.

4 8 - 6

In response to the comment, building 230 has been added to the figures in the Planning Guidelines.

Letter 49



PRESIDIO TRUST REC'D

2-2-07
P 5:09 ZR

August 2, 1999

NEPA Compliance Coordinator
 Presidio Trust
 34 Graham Street
 P.O. Box 29052
 San Francisco, California 94129-0052

By Facsimile

Re: Comments on Letterman Complex Draft EIS

Dear Sir or Madam:

On behalf of the National Trust for Historic Preservation, we wish to submit the following specific comments on the Draft Environmental Impact Statement (DEIS) regarding the development of the Letterman Complex. These comments are in addition to the more lengthy and detailed comments that we are submitting jointly with the Natural Resources Defense Council, the National Parks and Conservation Association, the Wilderness Society, the Sierra Club, and the San Francisco League of Conservation Voters.

49-1

We believe that the EIS and the planning process that led to it are flawed and that the most effective means for correcting these problems is to issue a new RFQ consistent with the goals of the Planning Guidelines as well as a new or Supplemental Draft EIS.

The General Objectives adopted by the Presidio Trust do not recognize the historic significance of the Presidio. The great efforts to ensure the preservation of the Presidio over the last three decades were in recognition of its natural, cultural and historic significance. The four general objectives that the Presidio Trust adopted by resolution and included in the Draft EIS omit any reference to the site's more than two hundred year history. The Presidio is a National Historic Landmark, a designation reserved for sites of the highest level of historic significance in our nation. While the Presidio is a site of unparalleled beauty, it is its history as a military installation dating to the Spanish and Mexican periods that renders it such an important national site. In addition, by qualifying the first objective with the phrase "where appropriate" the Trust appears to give itself broad discretion in its responsibility to preserve and enhance the resources that make the Presidio such a special place.

49-2

Protecting the Irreplaceable



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The National Trust also objects to the adoption of these objectives without any opportunity for public input. These general objectives will guide the Presidio Trust's decision making about development throughout this public site, and, as such, should reflect the public's interest. 49-2

The size of the development site is unduly constrained. We continue to question to the definition of the development site as only 23 acres, rather than the full 60 acres that historically has comprised the Letterman site. To split the site for this proposal imposes significant, arbitrary, and undue constraints on the ability to design the redevelopment in a sensitive manner and to minimize its impact on historic and environmental resources. The Letterman site should be considered as a whole. 49-3

The Draft EIS fails to evaluate the impact of the project on the Presidio as a whole. In addition, the EIS offers no discussion of how this development project will affect the larger 1,480-acre Presidio. The Presidio in its entirety is a National Historic Landmark. What happens in one portion of the site, especially such a focal entry point, has implications for the remainder of the site. The Draft EIS does not consider the cumulative effects of this proposed development on the Presidio as a whole, especially other existing uses and potential new uses within the Presidio. 49-4

The Draft EIS does not adequately evaluate impacts on historic and cultural resources. The DEIS is deficient in several respects concerning impacts to historic and cultural resources. The Draft EIS does not fully consider adverse effects on historic and cultural landscape features at the Presidio. For example, the Draft EIS asserts that the preferred alternative would "block the existing and historic view corridors at Edie Road and Torney Avenue," DEIS at 166, but "modifications to be made during design review" would nonetheless retain the historic view corridors after all. We seriously question whether the proposed development can be modified sufficiently to avoid this adverse effect. In any event, the EIS does not provide sufficient information either in text or visuals to assess the visual impacts of the alternatives on historic properties and views. The majority of historic resources within the 60-acre Letterman site lie northwest of the 23-acre project site. The look and feel of historic O'Reilly Avenue and the row of historic buildings that line it, as well as the Thoreau Center site, will clearly be impacted adversely by the adjacent 900,000 square-foot development. The sheer bulk of the new development is sure to affect the character of the historic Letterman complex. Without the aid of simulated photographs or other visual depictions it is impossible to determine or evaluate the degree of those impacts and whether the 85-foot buffer proposed along O'Reilly Avenue will be adequate to mitigate that impact. In addition, photographs of the historic view corridors for the site, and visual depictions of how those views will change under different alternatives, should be included to assist in this evaluation. 49-5

The Draft EIS also asserts that "historic drainage patterns and features would be preserved and reused whenever possible," DEIS at 118,166, but gives no indication of the extent to which that may or may not be possible under the preferred alternative. In addition, the DEIS states that significant landscape features outside the 23-acre site but



within the 60-acre Letterman complex “would be rehabilitated and preserved in the process of making changes to accommodate new uses.” ID. However, the document does not identify what these landscape rehabilitation projects or new uses may be, and therefore, it is not possible for the public to evaluate this vague reference to potential mitigation.

The reconfiguration of the Gorgas/Richardson access routes is likely to impact historic resources in ways that have not been evaluated. For example, the new Gorgas exit appears to be intended as the primary departure point for all employees from the Letterman complex and nearby areas of the Presidio. This new right-of-way would cut right through the historic complex of industrial buildings. Buildings 1170, 1160, 1152, and 1151 are in very close proximity to the new reconfigured routes. Yet the Draft EIS fails to evaluate any potential impacts to these historic buildings from the significant increase in vehicular access. The Draft EIS needs to evaluate not only the impact on users of those buildings (including the YMCA), but also any possible negative impacts to the buildings themselves from such close proximity of the new exit road.

49-5

The Timing of the Planning Guidelines is Problematic. Although we generally support the Planning Guidelines for the Letterman site, the respondents to the RFQ for this project did not have the benefit of those Guidelines when developing their responses. Thus the value of the Guidelines has been substantially lost by failing to incorporate them into the development process from the outset. In our view, this timing problem is largely responsible for the result that none of the alternatives is consistent with the Guidelines. Indeed, the preferred alternative is the *least* consistent with the Guidelines.

49-6

The Preferred Alternative is Not Consistent with the Planning Guidelines for the Letterman site. The project alternatives presented in the Draft EIS do not meet the Guidelines. For example, the cultural landscape section of the Guidelines calls for a “human scale design,” and further warns against development that is “exclusive” or “gated.” A development of three buildings 60 feet in height and totaling 900,000 square feet does not evoke human scale design, especially when compared to the residential-scale of the adjacent O’Reilly Avenue streetscape. In addition, the preferred alternative for the 23-acre site calls for one private business use, which does appear exclusive.

49-7

The Guidelines also provide that new construction is to be compatible with the existing historic architecture on the site. DEIS at B-35. Although it is not possible to evaluate the specific architectural features of the proposal, the very mass and bulk of the new development appears incompatible with the existing historic properties, especially those in the adjacent portion of the Letterman complex.

The Guidelines also encourage opportunities to interpret the historic Letterman site, yet the preferred alternative fails to address this issue. New development at the site provides an excellent opportunity to incorporate an interpretive program into site planning. There are numerous resources already at the Presidio that could be helpful in



this regard. The National Park Service and the Fort Point and Presidio Historical Association are two primary contacts.

Many other specific inconsistencies with the Planning Guidelines are detailed in the longer joint comment letter submitted today by the National Trust and other national environmental groups. Although the Presidio Trust has stated its intention to work with the selected developers to ensure compliance with the Planning Guidelines, it is difficult for us to see how a proposal so fundamentally incompatible with the Guidelines could be modified sufficiently to be made consistent with them.

49-7

The NEPA process is tainted by the public perception that a developer has already been selected. The media coverage of the exclusive negotiations with Lucasfilm has created a strong public perception that the Presidio Trust has already made a decision on the selection of a developer for this project and that the NEPA process is merely and after-the-fact exercise in paperwork. In our view, the only way to resolve the substantial problems with the Draft EIS for this proposed project is to issue a new RFQ that emphasizes consistency with the Planning Guidelines, and to prepare a new Draft or Supplemental Draft EIS for the project, based on the entire 60-acre Letterman complex.

49-8

We appreciate your consideration of the National Trust's views on this highly significant project.

Sincerely,



Courtney Damkroger
Acting Regional Director

cc: Natural Resources Defense Council
National Parks and Conservation Association
California Office of Historic Preservation
California Preservation Foundation
San Francisco Heritage
Fort Point and Presidio Historical Association

Responses to Comments in Letter 49

4 9 - 1

Thank you for your correspondence. The EIS has been prepared in full accordance with the policies and purposes of NEPA, and meets the standards for an adequate statement under the Act.

4 9 - 2

The Trust fully recognizes the historic significance of the Presidio (see Section 1.4 of the Final EIS). For response to the comment concerning the process for identifying and adopting the General Objectives of the GMPA and the recognition in the General Objectives of the historic significance of the Presidio, refer to master responses 3A and 3C.

4 9 - 3

For response to the comment concerning undue restraint of the development site to 23 acres rather than 60 acres, refer to master response 4A and Section 1.2.2 of the Final EIS. Refer also to Section 1.3 of the Final EIS and master response 6A.

4 9 - 4

Additional text in the cumulative impact discussion for cultural resources has been incorporated into the Final EIS to address these concerns. Please refer to master response 4B. It is assumed that development activities within the balance of the Presidio would be consistent with those put forward in the 1994 GMPA. The Programmatic Agreement between the Presidio Trust, SHPO, ACHP and NPS regarding undertakings within the Letterman Complex is included in Appendix F of the Final EIS. This agreement will be the vehicle for further assessing effects of undertakings at Letterman on the Presidio National Historic Landmark.

4 9 - 5

New text has been added to the Final EIS to further analyze the effects of each alternative on the historic setting and the National Historic Landmark district. In addition, to address concerns that the EIS does not adequately evaluate the visual impacts on historic properties and views, new text and graphics (Figures 20 – 24) have been added to the analysis of each alternative in Section 4 to discuss the effect of adding new construction on visual resources of the Letterman setting. Please refer to master responses 23 and 24 with regard to effects on the historic setting, including O’Reilly Avenue, and visual resources.

The O’Reilly Avenue buffer (O’Reilly Common) would be a linear open space of 85 feet in width. A distance of 125 feet would be maintained from the face of the historic O’Reilly Avenue buildings to the face of the new construction. The final building mass and bulk would be carefully studied and refined during the design review process. See master responses 7A and 7B for further discussion on compliance with the Planning and Design Guidelines. Photographs of the historic view corridors both before and after implementation of each alternative are not included in the Final EIS. Text is provided in Section 4, Environmental Consequences, as mentioned above. This type of visual analysis would be considered in the subsequent planning and design review process to ensure the proposal’s visual compatibility with the historic setting and the Planning Guidelines (see master response 24).



Regarding the comment about historic drainage patterns and features, please refer to the response to comment 44-28. Design details for the preferred alternative would be refined through design development and review as mentioned above. Alternatives 2 through 5 focus on actions within the 23-acre site; projects and rehabilitation activities outside of the 23-acre site would be subject to subsequent environmental analysis. And the Planning Guidelines would be used to direct these site improvements in the broader 60 acres.

Effects upon the historic resources have been included in the analysis of the Final EIS. With regard to the comments on the Gorgas Avenue/Richardson Avenue access routes and effects on the historic road corridors and buildings, please refer to master responses 18, 22 and 23. Additional text has been added to the Final EIS in Section 4, Environmental Consequences, to address these concerns, including effects on the individual buildings.

4 9 - 6

Please see the response to comment 44-13. The Trust disagrees that the value of the Planning Guidelines has been lost; they remain relevant for the duration of the design development and review process, a process that begins once the EIS is completed. Regarding the preferred alternative's consistency with the Planning Guidelines, please refer to master response 7A. With regard to future design and the review process as relates to the Guidelines, please see master response 7B. See also Section 1.4 of the Final EIS.

4 9 - 7

With regard to the alternatives' consistency/inconsistency with the Planning Guidelines, please refer to master response 7A. The Trust believes that the alternatives largely meet the recommendations put forth in the Guidelines, but has included additional analysis in Section 4, Environmental Consequences, of the Final EIS to identify inconsistencies with the Guidelines. Analysis of proposed building massing and scale has also been added to Section 4 for each alternative. Please refer to master response 24 for further discussion of massing, scale, and visual analysis. Please refer to master responses 7A and 7B for further discussion on applicability of the Planning Guidelines and design guidelines.

The Presidio Trust concurs that opportunities for an excellent interpretive program at the Letterman Complex are available. See master response 25. Text has been added to the Final EIS to elaborate upon visitor experience opportunities for each alternative. The Presidio Trust does not agree with the assertion that the preferred alternative is "fundamentally incompatible" with the Planning Guidelines and could not be modified to be more consistent with them. Please refer to mitigation measure CR-1, *Planning and Design Guidelines*.

4 9 - 8

For response to concerns that a developer was selected during the NEPA process, refer to master response 6B and Section 5.2 of the Final EIS.

Letter 50

WILD BRAIN™

PRESIDIO TRUST REC'D

REC'D - X 4-11-20
2 P 3:42 PM

2650 18th Street San Francisco, CA 94110

August 2, 1999

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

Re: Letterman Digital Center

Via Fax #415.561.5315

Dear Mr. Pelka:

I am writing to support the Letterman Digital Center at the Presidio and to comment on how the Center will help the Presidio meet the objectives of its General Management Plan.

As I understand the requirements, Presidio tenants must contribute to these objectives in the areas of community service, the arts, education, research, innovation and communication. I believe the Presidio made a wise choice in selecting the Lucas companies. All of the companies scheduled to move to the Letterman Digital Center have long histories of making significant contributions in these areas.

Wild Brain is an award-winning animation studio that both competes with and is an ally of the Lucas companies. As such, we have seen how the Lucas companies have helped make the San Francisco Bay Area the worldwide center for digital entertainment production. All industries rely on local talent pools and the Lucas companies have trained a number of our core employees, including myself and one of our founders. As we (and other companies like us) grow, we depend on the advances and people that result from the type of investment and training that the Letterman Digital Center will provide. It is not surprising that the Lucas companies have spawned many local companies, like ours, with the same goal—the production of high-quality work using state-of-the-art technology.

The Letterman Digital Center will attract other vendors and will support further industry growth. The base of local resources here in the Bay Area does not approach those of Hollywood. If the full potential of digital production is to be realized for San Francisco and the Bay Area, there needs to be investment on the scale of the Letterman Digital Center.

Training and infrastructure investment is vital to the future of the digital revolution. Pioneers like the Lucas companies can help give the Bay Area a boost toward becoming the digital entertainment center of the future.

Sincerely,

Jeffrey C. Ulin
CEO

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Response to Comment in Letter 50

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