

Letter 51



Founder/Executive Director
Mark Fishkin

August 2, 1999

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

FAX (415) 561-5315

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Dear Mr. Pelka,

I enthusiastically add my vote of support for Lucasfilm and the exciting new Letterman Digital Arts project. We have found it an honor and a pleasure to work with this award winning and industry respected company who is committed to the moving image as an art form.

Lucasfilm has been an international flagship for innovative creative expression for film and the digital arts.

The Lucas vision for the Presidio will attract individuals and companies who want to be on the forefront of new media technologies while providing a cornerstone for the burgeoning network of national and Bay Area new media businesses. I've attached an article that recently appeared in the *LA Times*. I thought the author was quite articulate in captivating the importance of Letterman Digital Arts not only to the Bay Area but also to the industry at large.

For over a decade the Film Institute of Northern California has received multi-level support from the Lucasfilm organization. Lucasfilm has generously invested time, expertise, equipment and dollars to support the Film Institute of Northern California (including its projects: Mill Valley Film Festival - Rafael Film Center - Outreach and Education) and other developing arts organizations.

There can be no better example of corporate commitment to quality, artistic vision or the future, than the Lucas organization.

Thank you for your time.

Sincerely,

Mark Fishkin
 Executive Director

38 Miller Avenue, Suite 6
 Mill Valley, California 94941

tel: 415-383-5256
 fax: 415-383-8606

e-mail: finc@well.com
 web: www.finc.org

51-1



Response to Comment in Letter 51

5 1 - 1

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



Letter 52

August 2, 1999

NEPA Coordinator
Mr. Pelka
ATTN: Letterman Complex
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129

BY FAX: 561-5315

1 page(s), including this one

Dear Mr. Pelka:

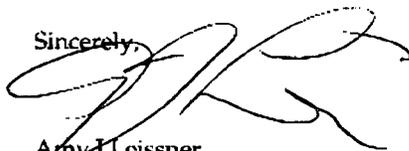
I write in support of the Letterman Digital Arts proposed development for the Presidio.

As the Executive Director of the San Francisco Film Society, presenter of the San Francisco International Film Festival, I have seen the contribution that Lucas companies have made to the arts in the Bay Area. Their success has helped make the Bay Area an increasingly powerful force in the film world. At the Presidio, they will lead the way in creating a dynamic hub of artists and technicians that will benefit not only the Presidio community and the city of San Francisco, but the entire Bay Area, by shifting the focus from Hollywood to San Francisco for new film technology.

The Lucas companies have an outstanding reputation for responsible community participation. As a future tenant of the San Francisco Film Centre at the Presidio, we at the Film Society are eagerly anticipating working with Lucas Digital Arts in a way that will benefit other Presidio tenants, the film arts and the public.

We are excited to be a part of the development of a unique urban park, and we know that Lucas Digital Arts will make a strong contribution to an enhanced visitor experience at the Presidio and interact in a very positive way with the community. Thank you for your consideration.

Sincerely,



Amy J. Leissner
Executive Director

cc: Melanic Blum
BY FAX: 561-2244



**SAN FRANCISCO
FILM SOCIETY**

Presenter of the San Francisco
International Film Festival

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52-1



Response to Comment in Letter 52

5 2 - 1

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

Letter 53

Sierra Club Loma Prieta Chapter

c/o Gail Sredanovic
2161 Ashton Ave.
Menlo Park, CA 94025

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

RE: Presidio DEIS

Dear Trustees: The Loma Prieta Chapter of the Sierra Club is greatly concerned about the DEIS and the proposed plans for the Presidio.

A. The public process for making decisions for the Presidio has been inadequate.

• Many decisions are being made without the public having access to the underlying information upon which these decisions are based. The financial details on which plans are based for the Presidio have not been adequately disclosed to the public. Added to these deficiencies, on 7/23/99 we called the Trust office to request that a copy of the budget be mailed to us. The response was that it was necessary to personally come to the trust office which is located in San Francisco, weekdays between 8 am and 5 pm. This places an undue burden upon the public seeking information.

53-1

• In other cases, the necessary underlying information has not apparently been developed or is not planned to be. There are no surveys for the flora and fauna. Scientifically adequate surveys need to be completed. The information to determine the impact of the five alternatives in the DEIS on the natural environment is not provided.

53-2

• Other decisions are being made before public input is even completed. The Trust has apparently engaged in exclusive negotiations with Lucas Films regarding the Letterman site even before the end of the public comment period.

53-3

B. Negative Impact.

• We are greatly concerned that the flaws in the process and deficiencies in the DEIS will lead to negative impacts on the natural environment in the Presidio. It appears that planning is being driven by a planning/development/commercialization mind set as opposed to being driven by concerns for the natural environment. This is exemplified in the DEIS by the lack of adequate scientific studies and surveys of the existing flora and fauna of the Presidio and studies and measures to protect them. In addition, there should be studies to review restoration of native vegetation and mitigation of possible invasion by exotic plants and weeds which might disrupt the environment due to the new construction and due to additional impacts from traffic and noise.

53-4



• The uses to which the buildings will be put may not be congruent with the goals of the National Park Service or the public good. This is after all public land.] 53-5

C. Decrease in structures and impacts. We agree with restoration of existing buildings but not with the current emphasis on new construction which is not congruent with the concept of a National Park. In fact we would urge the Trust to significantly decrease the total number of buildings, their total footprint and their total square footage.] 53-6

Sincerely,

Gail Sredanovic and Joyce Eden on behalf of the Sierra Club Loma Prieta Chapter



Responses to Comments in Letter 53

5 3 - 1

Thank you for your letter. Please see Section 5.1 of the Final EIS. In addition, the commentors are referred to the FMP in Appendix E of the Final EIS. The FMP and the Presidio Trust's annual budget are available for review in the Presidio Trust's library at 34 Graham Street (open weekdays and Saturday morning), and on the Presidio Trust's website (www.presidiotrust.gov). The Presidio Trust regrets that the commentors were given inaccurate information. Please refer to master responses 5, 10A, and 10B.

5 3 - 2

Refer to master response 16.

5 3 - 3

For response to comments concerning the apparent selection of and negotiation with a developer before completion of the NEPA process, refer to master response 6B.

5 3 - 4

The Presidio Trust disagrees with the commentors. There are no flaws in the process or deficiencies in the EIS that would lead to significant adverse impacts on the natural environment. Planning and decision-making for the Letterman Complex is being guided by environmental considerations integrated with economic and technical considerations to meet the requirements of the Trust Act and NEPA. The efficient collection and effective use of quality baseline data and surveys lead to the development of design and mitigation measures to avoid impacts on the natural environment (see master response 16). Additional studies of native vegetation are not required because effects were found to be insignificant. However, a detailed landscaping plan would be prepared as required by mitigation measure NP-1, *Landscaping Plan*, to maximize opportunities for native habitat enhancement. Disturbed areas would be revegetated and stabilized as soon as possible after grading or construction to address erosion control and possible invasion by exotic plants and weeds in accordance with the Storm Water Pollution Prevention Plan and the Vegetation Management Plan.

5 3 - 5

The comment is noted for the record. For further response, refer to master responses 1A and 2A.

5 3 - 6

The GMPA, which serves as the Trust's foundational planning document, sets forth a varied mix of preservation, rehabilitation, demolition, and new construction. Because it was not known whether the specific use identified in the GMPA for the Letterman Complex could be satisfied or a specific user found, the GMPA left open the possibility of new replacement construction of the LAMC facility, subject to further environmental analysis as has been completed in this EIS. With new construction being limited under the GMPA to developed areas and significant constraints on the amount of new construction allowed in other planning areas, the 23-acre site had by far the largest potential for new replacement construction, and therefore, consistent with the need to locate the project at a site with the essential characteristics for financial success — to serve as the economic engine for other rehabilitation, preservation, and demolition projects at the Presidio — this proposal involves significant new replacement construction. Please also refer to the discussion of this project's purpose and need in Section 1.2 of the EIS.

Letter 54

NEPA COMPLIANCE CO-ORDINATOR
Attn: Letterman Complex
Presidio " Trust "
34 Graham St.
P.O. Box 29052
San Francisco, CA 94129 – 0052

Dear Sirs,

I, as a private citizen, wish to formally object in the strongest possible manner, officially, to the present publicly announced plans for the " re- use " of the Presidio of San Francisco. As a citizen of the United States I also object to the creation of the " trust " as presently constituted.

This land, indeed ALL land, is sacred. Particularly, this land must not be subject to that peculiar phenomenon known as " Development ". Human activities to reform nature, intentionally, are circumspect. The land and the structures which are presently sited in this former Army base are a part of a whole.

This San Francisco region is unique in that an urban metropolis benefits from a close proximity to nature. The Golden Gate national recreation area serves as model of successful land use. This is due to the wise provision for the strict attention to the ecology which the law formerly provided.

The " trust's " intentions to alter the landscape is perhaps the most foolish and dangerous precedent imaginable.

The proper and necessary purpose to which this land MUST be turned to is as an institute for Global Reforestation and Natural Wisdom. The upkeep of the structures can be accomplished through the solicitation of Universities throughout the country to create a " trust " in the actual meaning of a Public Trust organization.

The present plans of the Presidio " Trust " are founded on an absurd premise; namely, that nature must " pay its own way ". The Presidio of San Francisco is land which has been carefully husbanded for over two centuries. Until the present, human habitation has been beneficial.

The future of the Presidio of San Francisco may be the most important single issue in this nation. The Present situation, both nationally and globally, which has been created by " the new world order " "economy ", has vastly accelerated the destruction of the natural world and the mis-use of productive lands.

Farm prices, lumbering, the wise use of science, energy generation and renewable energy in the future, trade, human and indigenous rights, democracy, and climactic change, are not separate or discrete matters. Indeed, the traditional assumption that nature and the natural world can be divided and changed with-out consequence has become increasingly more questionable during the present decade.

The Presidio is presently ideally suited to the creation of a seasonal conference for the mutual exchange of knowledge and for generating public responsibility for the status and use of land in the United States. Each of the many small structures should be the responsibility, financially, of a particular university or organization. During the summer months, students and other persons may attend to studies and other activities which will attend generally to sustaining natural balance and human well being upon land, and in regard to sustainable prosperity.

The Letterman complex must be preserved. Indeed, this property is not dangerous structurally or otherwise below standard. The intention to " demolish " this structure, at the public's expense, is unconscionable. The mere removal and disposition of the rubble IS an environmental danger.

54-1



The intentions to remake the landscape of the Main Post such that some intense form of commerce will ensue is unconscionable. The carbon monoxide produced by vehicles is an anathema to all forms of animal life.

The waste water produced is intended to be carried to the overburdened S.E. Treatment plant; essentially dumped on the poor. The odors produced presently from this facility are increasing and the out-flow to the Bay is seriously damaging the eco-system and the fisheries.

The creation of an Environmental Conference center is the wisest choice. The Letterman Complex is essential as an administrative building, computer center, and as a center for communications and data storage.

The structure at 14th Av. and Lake St. will serve very well as a permanent lecture and scholastic center. The professorial staff may be housed in the former army housing nearby to this structure.

The Exploratorium is ideally situated to the function of teaching and demonstrating the principles of science, as well as the practical limitations of science.

As a low intensity "university", the Presidio will probably generate more income, goodwill, spiritual benefit, and tourism than the present scheme could possibly imagine. The re-use of this land in the manner which I suggest is essential to the future of this nation.

54-1

Please Reply,

Bryan Foster
2135 Hayes Street
San Francisco, CA
94117

August 2, 1999



Response to Comment in Letter 54

5 4 - 1

Thank you for your correspondence. Please refer to Section 1.3 for a discussion of the purpose and need for the project. The commentator's objections to new development at the Presidio and to the Presidio Trust are noted for the record. The impacts on regional solid waste facilities, air quality and wastewater facilities alluded to in the letter are discussed in Section 4 (Environmental Consequences) and Appendix A (Revised Environmental Screening Form) of the EIS. No further agency response is warranted.

Letter 55

COALITION FOR SAN FRANCISCO NEIGHBORHOODS

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Vice President

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Russian Hill Neighbors

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Responsible People

Sunset-Parkside Education &

Action Committee

Telegraph Hill Dwellers

Twin Peaks Council & Open

Space Conservancy

West Presidio Neighborhood

Association

August 2, 1999

VIA FAX TO: 415-561-5315

9 PAGES

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

Dear Coordinator,

This letter submits comments on the Draft Supplemental Environmental Impact Statement (DSEIS) for the Letterman Complex on behalf of the Coalition for San Francisco Neighborhoods, representing 35 neighborhood associations geographically based throughout San Francisco. Our member, Marina Civic Improvement & Property Owners Association, is the immediate adjacent neighbor to the Letterman Complex.

Vision and Concept

The vision of the 1994 GMPA for the Letterman site is very different from what is envisioned today in Alternatives 2-5 of the DSEIS.

"The Letterman complex will be devoted to issues of health, life and earth sciences." (GMPA p.vi)
"The Letterman complex will continue to be used to nurture ideas and support research and actions to improve human and environmental health." (p.72)
"In keeping with the Presidio vision, the Letterman complex will be dedicated to scientific research and education focusing on issues of human health." (GMPA p.72)

55-1

* Please reconcile the Lucas Digital Arts proposal for 836,000 sq. ft. of commercial office space and 60,000 sq. ft. of retail/archive with the GMPA vision for the Letterman complex.

* Since the Preferred Alternative differs vastly from the management plan for the Letterman site developed by the Park Service and embraced by the public, please discuss why an amendment to GMPA, proposing the Trust's new management plan and new vision for the Letterman complex, was not prepared and circulated for public comment prior to the release of the Letterman Request for Proposals.

55-2



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- * The DSEIS for Letterman lacks any assessment of the impacts of the Letterman alternatives on other parts of the Presidio, its natural resources, and future development. Please provide such an assessment in your response. 55-3
- * The DSEIS also lacks any assessment of the impacts of the development proposals for Letterman on the neighboring Marina District. Please provide such an assessment in your response. 55-4
- * The DSEIS further lacks any assessment of the impacts of the preferred alternative on the financial future of the Presidio Trust and any discussion of the financial implications for the Presidio National Park of a long-term (up to 99 Years) land lease which would encumber park resources in private hands for possibly many years beyond the existence of the Trust. Please clarify what would happen to the Letterman complex if the Trust fails to be financially self-sufficient by 2013 and a long-term land lease has been signed. 55-5

Purpose and Need

- There is no public mandate for massive new construction in the Presidio National Park, as proposed by the Preferred Alternative 5 for the Letterman Complex. 55-6
- The DSEIS states: "The proposed project is needed to achieve the Presidio Trust Act's mandate that the Presidio Trust be financially self-sufficient by 2013." (DSEIS p.iii)
- * This is a naked conclusion, not a description, much less an alternatives analysis under NEPA. Please present supportive documentation and discussion which warrants this conclusion. 55-7
- * Please present an analysis of the impact to Trust finances if the Letterman site were not developed. 55-7
- * Please reconcile the statement that the project is "needed" to achieve financial self-sufficiency for the Trust with the following observations:

A casual analysis of income able to be generated from existing residential leasing alone reveals that the entire operating costs of the Presidio in the year 2013 (\$35.7 million in FY 1998 dollars) can be achieved without development of the Letterman site. 55-8

The Financial Management Program Report to Congress 7/8/98 states (p.13): "Housing rents will be market-based." At the present time, there are 1119 units of housing at the Presidio, most of it multiple-bedroom family housing. At the present time, in the Presidio's surrounding neighborhoods, one-bedroom apartments rent for an average of \$2,000 per month. Two and three bedroom flats rent for an average of \$3,000 per month.



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Assuming all existing Presidio units were one-bedrooms, market-based rents would generate \$26,856,000 per year. Taking into consideration that most Presidio units are multiple-bedroom apartments, duplexes, and houses, a conservative, market-based estimated average rent for a typical unit of \$3,000 per month would generate annual revenue to the Trust of \$40,284,000. (Estimated housing renovation costs of \$70,000 per unit (p.12-13) could easily be recaptured from the rental income stream in the first few years).

55-8

When consideration is given to the combined income from non-residential leasing and residential leasing, it appears that the Presidio Trust could achieve financial self-sufficiency by 2013 without development at the Letterman Complex.

Square Footage Ceiling at Letterman Complex

Planning guidelines for new construction typically include underground development as well as above-ground development when calculating the square footage of any project.

The proposed new underground construction of a parking garage at the Letterman site would be 589,000 sq. ft. The above-ground development would be 900,000 sq. ft. Added together, the resulting square footage exceeds limits imposed by the GMPA for the Letterman site.

55-9

- * Please explain why underground development square footage should not be included in the calculation of total square footage of the project.

Sanitary Sewage

The City of San Francisco is under no obligation to accept sanitary sewage from the Presidio after the present contract expires in 2004. According to SFPUC General Manager Anson Moran, there is no MOU of any kind between the City and the Presidio for acceptance of Presidio sanitary sewage into the City's system beyond that date. At the present time, the Presidio Trust is unable to provide on-site storage and treatment of its own waste before discharge into the Bay or Ocean.

55-10

- * Please identify any contract or MOU, written or implied, between the City and the Presidio Trust whereby the City agrees to accept Presidio sewage into the City's system on a long-term basis.
- * Please present alternatives for sanitary sewage treatment and disposal if the City cannot accept Presidio sewage after 2004.

55-11



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Under the existing sanitary sewer system at the Letterman Complex, all sewage from Letterman discharges into the City's system at the Lombard Gate and is treated at the City's Southeast Water Pollution Control Plant (SEWPCP). (DSEIS p.A-6) Maximum outflows into the City's system are estimated at 78,000 gallons per day (or 28,470,000 gallons per year). (p.A-6)

55-12

* Please identify how this will be metered and whether 78,000 gpd is an absolute maximum to which the Presidio Trust commits.

The DSEIS states: "Maximum outflow resulting from the Alternatives (78,000 gpd) would not burden the City & County of San Francisco wastewater treatment facilities because the City has the capacity to readily handle the estimated sewage discharge." (DSEIS p.viii) Again, by reference to the GMPA FEIS p. 170, the statement is made that "analysis determined that no additional burden on the City system would be expected because it has the capacity to readily handle the estimated sewage discharge.." (DSEIS p.A-6).

* These are naked assertions without supporting documentation other than a "personal communication" with a CCSF PUC employee. Please provide documentation which supports your conclusion of "no burden" to the City, in light of the following facts:

All Letterman sewage is treated at the SEWPCP. This plant does NOT have additional capacity in wet weather. Feces and other raw sewage regularly backflow from storm drains in wet weather, flooding the streets of the Bayview District. According to testimony before the Health, Family & Environment Committee of the SF Board of Supervisors on 5/14/98, PUC General Manager Moran stated: "There is in the Southeast part of town flooding which takes place regularly in heavy storm periods." At the same hearing, Supervisors Bierman, Katz, Ammiano and Brown stated: "This is unacceptable." The SEWPCP already treats 80% of all sewage generated in the City of San Francisco.

55-13

Since the writing of the 1994 GMPA FEIS, huge new developments on the Eastern side of San Francisco have been planned and are coming on-line, producing further stress on the capacity of the SEWPCP to treat the City's sewage.

According to further testimony of PUC General Manager Moran before the Public Utilities & Deregulation Committee of the SF Board of Supervisors 7/20/99: "There are failures in our sewer system (at SEWPCP) due to structural inadequacies and hydraulic inadequacies," and the estimated cost to remedy these inadequacies is \$190.0 million.

According to the GMPA FEIS p.170, estimated sewage from the Presidio as a whole which is to be discharged into the City's system is 392,000 gallons per day (or 143,080,000 gallons per year).



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Questions:

- * How much of the 143,080,000 gpy will go to the SEWPCP? Will any of it go to Oceanside? At the present time, is there a connection for Presidio sewage to be transported to Oceanside? 55-13
- * Is the estimate of 143,080,000 gpy an absolute maximum to which the Presidio Trust commits? 55-14
- * Under NEPA, the Trust must consider all reasonable alternatives to a proposed course of action. Since the City's sewer system at SEWPCP is at present already over-burdened in wet weather, please discuss the alternative of Presidio on-site storage of sewage in wet weather before discharge into the City's system. Will the Trust build on-site storage capability? 55-15
- * Since the large amount of new development coming on-line in the Eastern sections of San Francisco will further burden the SEWPCP, and sewage from the Presidio/Letterman will take up capacity in the City's system, please discuss the alternative of the Presidio Trust building and operating its own on-site sewage treatment plant to accommodate its own development. 55-16
- * Ongoing disposal of sanitary sewage into the City's system will contribute to a cumulative reduction in municipal sewage treatment capacity. The issue of Presidio sanitary sewage discharging into the City's system requires additional analysis. 55-17

Solid Waste

- * Has the Presidio Trust obtained approval from the California Integrated Waste Management Board to send Letterman solid waste from demolition/construction activities (estimated at 80,000 tons) to either of the three cited disposal sites: Redwood, Altamont, or Zanker Road? (MP 131) 55-18
- * Is there any agreement between the Presidio Trust and any landfill operator to accept Letterman demolition/construction debris? 55-19
- * According to the SF Department of the Environment, the Altamont Landfill, which the City uses, will be at capacity in less than 7 years. The CCSF at the present time has no identified alternative for its own future solid waste needs when Altamont is full. If disposal of debris from Letterman goes to Altamont, it will adversely impact the solid waste disposal capacity of the CCSF. Disposal at any other site will adversely impact regional capacity. 55-20



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- * Please discuss the alternative of the Presidio Trust disposing of its own demolition/construction debris at one of the 17 existing landfill sites on the Presidio. This action would relieve the burden on the landfill sites available to the City. 55-20
- * California AB 939 requires all jurisdictions to direct 50% of their total waste stream from landfills by 2000. Is the Trust meeting this mandate? 55-21

Water Supply

- The DSEIS states: "Lobos Creek will be unable to meet the Presidio demand of 1.69 million gallons per day (616,850,000 gallons per year) under high use assumptions." (p.54)
"The Presidio Trust is in the process of planning for contingency and emergency access to additional sources of water as well as implementing domestic and irrigation water conservation measures to reduce the overall consumption of water at the Presidio to fit within available supply." (p.54) 55-22
- * Please clarify what is meant by "contingency" access and what is meant by "emergency" access. What defines an emergency? Would expectation of contingencies or emergencies dictate the limitation of the amount of future development at the Presidio? 55-23
 - * Please specify the "additional sources of water." 55-23
 - * Mitigation Measure WS-2 states: "Reduce water demand from Lobos Creek by securing an alternate water supply source, such as the anticipated use of reclaimed water from the City of San Francisco water system for Presidio irrigation purposes." (p.36)

There is no possibility for the foreseeable future of the Trust obtaining reclaimed water from the City, since no such capability exists on the part of the City to provide reclaimed water to anyone. Such capability is dependent on the construction of hundreds of millions of dollars of City infrastructure and increased bonded indebtedness. This is highly unlikely to occur. 55-24
 - * Therefore, please identify the "alternate water supply source" if City reclaimed water is unavailable to the Presidio. 55-25
 - * Please clarify whether the Presidio Trust will ask the City for Hetch Hetchy water. If so, in what amounts? 55-25
- Because of past drought experience and because of recent increased planned development and expected increased water demand within San Francisco, the PUC has recently given its General Manager authority to impose mandatory water conservation measures on San Franciscans. 55-26



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- * IF Hetch Hetchy water, in any amount, is supplied to the Presidio, this would reduce the supply available to San Franciscans. Please discuss what would be the impacts to the citizens of San Francisco to reduce their own available water supply in order to provide water to the Presidio to accommodate federal park development. 55-26
- * Any request by the Presidio Trust for Hetch Hetchy water, whether emergency or non-emergency, would have an adverse impact on the other users of Hetch Hetchy water since it would decrease available supply. The CCSF is under no obligation to provide water to the Presidio. If the City cannot make Hetch Hetchy water available to the Presidio, what will be the impacts on development plans for the Letterman site? For the Presidio in its entirety? 55-27
- * Can the Presidio Trust provide for all its water needs which are necessary to accommodate Letterman and Presidio development without access to Hetch Hetchy water? 55-28
- * The Presidio Trust has the alternative of satisfying all its own water needs from its own resources (Lobos Creek), so as not to make any demands on the City's supply, by either limiting Presidio development to fit within available water supply from Lobos Creek, or identifying a source of supply other than Hetch Hetchy. Please discuss the alternative of limiting Letterman/Presidio development in order to fit the amount of development to available Lobos Creek supply. 55-29
- * Please discuss the alternative of the Trust building its own desalination plant to develop additional water supply. 55-30
- * Please discuss the alternative of the Trust building its own reclaimed water plant to supply its own irrigation needs. 55-31
- * If LAMC and LAIR were mothballed and eventually demolished, 32,485,000 gallons of water per year (89,000 gpd) (DSEIS p.54) would be available for use elsewhere on the Presidio. Please discuss this alternative in the context of available supply from Lobos Creek. 55-32

Transportation

- * The Alternative 5 Lucas Digital Arts proposal includes new construction of a 1500 car underground parking garage. Please clarify how the addition of a 1500 car parking garage is consistent with stated GMPA goals of reducing and limiting vehicular access to the Presidio. 55-33
- * Please discuss the alternative of NO garage at the Letterman site. 55-34



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- * Please discuss the alternative of mandating that Letterman tenant employees take public transit or vanpool to work, leaving their private vehicles at home and relieving the need to provide parking at the Letterman site. 55-35

- * The proposed entrance/exit of the garage is to be from Gorgas Avenue and Doyle Drive. Doyle Drive is federal highway 101, the principal access to the Golden Gate Bridge, and a key component of the regional transportation system. The siting of the garage as proposed will adversely impact the flow of traffic on Doyle Drive. 55-36

- Please discuss the alternative of siting the garage entrance/exit elsewhere on the Letterman site, for example, from the West, so that access and egress would be from internal Presidio streets such as O'Reilly or Letterman Drive, which would help alleviate anticipated congestion on Highway 101.

- * Please clarify how using Gorgas as the main vehicular entrance to the Letterman site is consistent with GMPA goals of Gorgas as a pedestrian street. 55-37

- * Please clarify how tour and shuttle buses would access the Letterman site and where they would park. 55-38

- * A new intersection adjacent to Bldg. 1160, where none now exists, is proposed. Also proposed is a new, reconfigured intersection at Gorgas/Lyon/Richardson/Doyle. Both intersections would provide left turns for westbound Doyle traffic into the Letterman site, and would also make provision for left turns from the Letterman site onto Doyle. The resultant significant increase in red light time stopping Doyle traffic will impede traffic flow on this federal highway. 55-39

- * Please identify alternatives to these two new intersections. 55-40
- * Please discuss the off-site impacts of these new intersections on the traffic patterns on neighboring residential streets of the Marina District, particularly Marina Blvd.

- * The 1993 Doyle Drive Task Force Report, whose recommendations were adopted by the SF Board of Supervisors, identifies Gorgas Avenue as the preferred alignment for the soon-to-be rebuilt Doyle Drive. If the main vehicular access to the Letterman site is changed from the present access through the Lombard Gate to Gorgas Avenue, this might preempt the use of Gorgas for the rebuilt Doyle Drive alignment. 55-41

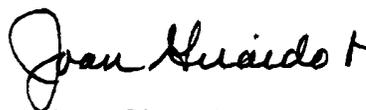
- Under NEPA, the agency preparing an EIS must discuss "possible conflicts between the proposed action and ... local... land use plans [and] policies..." (40CFR§1502.16(c).) "To better integrate environmental impact statements into...local planning processes"



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- an EIS must discuss "any inconsistencies of a proposed action" with local plans, whether or not those plans are federally sanctioned. (40CFR§1506.2(d).) Where an inconsistency exists, the EIS is to "describe the extent to which the agency would reconcile its proposed action with the plan..." (Id).
- * How will the Presidio Trust reconcile its proposal to use Gorgas Avenue as the main vehicular entrance to the proposed 1500 car garage with the City's desire to use Gorgas Avenue for the realignment of Doyle Drive? 55-41
- * The DSEIS p. 33 states: "A Transportation Demand Management program would be put in place to minimize traffic impacts..." What are the numerical standards that define "minimize"? What does "minimize" signify in terms of present-day traffic volumes? 55-42
- * The City of San Francisco has no agreement with the Presidio Trust regarding the proposal for intersection changes and new signalization at Gorgas/Lyon/Richardson/Doyle Drive. Please identify a source of funding for the proposed changes. Please identify alternatives to the proposed changes to this intersection. 55-43
- * Is there any agreement between the Presidio Trust and Caltrans for the Trust's proposed new intersection behind the Palace of Fine Arts on Doyle Drive adjacent to Bldg. 1160? 55-44
- * Please identify a source of funding for this proposed new intersection. 55-45
- * Please identify alternatives to this proposed intersection. 55-46
- * The Lombard Street Gate is presently the primary vehicular entrance to the Presidio from the East and to the Letterman site; Gorgas Avenue is a secondary entrance. Alternatives 2-5 would reverse this traffic pattern, making Gorgas the primary vehicular entrance. Please discuss on-site and off-site impacts of this reversal on the traffic patterns of Highway 101 and on the traffic circulation patterns of the Marine District. 55-47
- * Please reconcile DSEIS Table 4 p. 66 with "Presidio Transportation Planning & Analysis Technical Report" (A Supplement to the GMPA) p111-24 Table III-2 LOS for Doyle/Marina/Lyon = "F". 55-48

Thank you for the opportunity to comment on the Letterman DSEIS.



Joan Girardot
President - CSFN



Responses to Comments in Letter 55

5 5 - 1

Thank you for your letter. This inconsistency is addressed in Section 4.5.1.2 of the final EIS. Also, please refer to master response 2A with regard to conformity with the GMPA and to Sections 1.1 and 1.2 of the Final EIS.

5 5 - 2

Please see master responses 2A, 2B, and 4A.

5 5 - 3

Please refer to the response to comment 44-45 and master responses 4B and 16.

5 5 - 4

Please refer to master response 17.

5 5 - 5

For response to the comment concerning the financial effects of the project on the Presidio, please refer to master response 10A and Section 1.2 of the Final EIS. In addition, the Trust Act in Section 104(o) specifies that if the Trust fails to become financially self-sufficient by 2013, the property under its jurisdiction will be transferred to the General Services Administration to be disposed of in accordance with the procedures outlined in the Defense Authorization Act of 1990 (104 Stat. 1890), and transferred lands will be deleted from the boundary of the Golden Gate National Recreation Area. In the event of such transfer, the terms and conditions of all agreements and loans regarding such lands and facilities entered into by the Trust will be binding on any successor in interest. Pursuant to this provision, the preferred alternative and other leased properties would remain in the uses specified in lease agreements. Please refer to the Financial Management Program in Appendix E of the Final EIS and to master responses 10A and 10B.

5 5 - 6 AND 5 5 - 7

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

5 5 - 8

The Financial Management Program in Appendix E of the Final EIS projects fiscal year 2013 housing revenues of \$20.6 million, in 1998 dollars, *net of operating expenses*. The commentor's approximation of Presidio housing revenues does not net out operating expenses, currently estimated at 27 percent. Nor does the approximation reflect the cost of Trust programs to discount the cost of housing for Presidio-based households with annual household gross incomes of less than \$45,000. Please refer to the Financial Management Program in Appendix E of the Final EIS, and master response 10A.

5 5 - 9

Please see master response 11.

5 5 - 1 0 AND 5 5 - 1 1

The commentor is correct. There is no such contract or MOU. Please refer to master response 14.



5 5 - 1 2

The 78,000 gpd is a reasonable “worst-case” estimate based on the best information available to date (the preferred alternative would discharge substantially less: 51,000 gpd). The Presidio Trust is committed to establishing a reclaimed water system to reduce cumulative impacts on the city’s sanitary sewer system, including the project’s contribution to cumulative impacts. Please refer to master response 14.

5 5 - 1 3

First Asterisk – This conclusion was supported by the City and County of San Francisco (CCSF) and was previously discussed in the GMPA EIS from which this EIS tiers. Please refer to master response 14.

Second Asterisk – Currently, the Presidio discharges sewage into the CCSF’s Southeast Water Pollution Control Plant (SEWPCP) and Oceanside treatment plants. Its current flow into the SEWPCP system is approximately 280,000 gpd. Its current flow into the Oceanside system is approximately 85,000 gpd.

5 5 - 1 4

The Presidio Trust is committed to addressing waste management in an environmentally responsible manner as contemplated in the general objectives of the GMPA. The reclaimed water system referred to in master response 14 is an example of this commitment, which would reduce the amount of sewage discharged to the SEWPCP by a minimum of 200,000 gpd.

5 5 - 1 5 A N D 5 5 - 1 6

Please refer to master response 14.

5 5 - 1 7

Please refer to Section G.2, Wastewater Treatment and Disposal in Appendix A of the Final EIS for the requested additional analysis and to master response 14.

5 5 - 1 8

The California Integrated Waste Management Board (CIWMB) is responsible for certifying local enforcement agency programs; reviewing permitting and closure/postclosure documents; providing inspection and oversight of local programs to ensure that state programs are effectively implemented; enforcing state standards and permit conditions in addition to or in lieu of a local enforcement agency; and administering a remediation program for orphaned, illegal, and abandoned sites. A copy of the EIS was provided to the CIWMB through the California Environmental Protection Agency for their review to ensure that impacts on solid waste facilities were adequately addressed. No further CIWMB action on the Letterman project is required.

5 5 - 1 9

No such agreement has been made nor would it be possible or desirable this early in the development stage of the project. However, as discussed in the Draft EIS, all landfill operators interviewed by the Presidio Trust expressed interest and had sufficient capacity to accept the debris.

5 5 - 2 0

The Presidio Trust agrees with the conclusion reached by the commentor. The cumulative impacts on the regional solid waste capacity are discussed in Sections 4.1.11.1 through 4.6.11.1 of the Final EIS. There are no landfill sites on the Presidio that have not been identified for cleanup.



5 5 - 2 1

No, because Presidio Trust waste diversion programs, including waste reduction, reuse, recycling, and composting, are still in the infancy stages. However, the Presidio Trust is committed to meeting the goal of California AB 939 for the Letterman project (see mitigation measure SW-1, *Waste Reduction Goals*).

5 5 - 2 2

A significant water shortage on the Presidio would constitute a contingency or emergency (i.e., should there be a significant shortfall between available water and water demand). As shown in Table 12, Water System Demand and discussed in Section 4.5.3 of the Final EIS, this shortfall would peak at about 286,000 gpd in June in typical and drier years. In the unlikely event that the Presidio Trust were unable to implement those supply- and demand-side solutions identified in mitigation measure WS-2, *Water Supply- and Demand-Side Solutions to Reduce Cumulative Effects*, to mitigate potential shortfalls, it would consider limiting future development. Refer to master response 13.

5 5 - 2 3

The primary additional source of water would be reclaimed water from the Presidio's proposed water reclamation plant. The availability of this water for irrigation use would free up substantial amounts of Lobos Creek water for potable applications. The text in Section 3.5.2 of the Draft EIS has been revised to reflect this water source. Refer to master response 13.

5 5 - 2 4

The conclusion reached by the commentor is also supported by the city (see comment 36-3). Therefore, the mitigation measure now refers to the availability of Presidio reclaimed or purchased water as alternative water supply sources to CCSF reclaimed water.

5 5 - 2 5 A N D 5 5 - 2 6

The city has asserted that it is not obligated to supply water to the Presidio (see comment 36-2). As stated in mitigation measure WS-2, the Presidio Trust is in the process of implementing an array of supply- and demand-side solutions to mitigate potential shortfalls resulting from Lobos Creek protection. To protect the unique Lobos Creek habitat and water supply resource, the solutions listed in the mitigation measure and others would be explored, adopted, and implemented as soon as possible. While the Presidio Trust does not at this time expect to rely on city water to meet the needs of projected Presidio demand in the long term, it cannot dismiss the possibility of entering into negotiation of water purchase and/or resale agreement with the city in the near future. Use of CCSF water may be unnecessary because implementation of the remaining listed measures would result in a water savings that would more than compensate for the Presidio-wide peak shortfall. Refer to master response 13.

5 5 - 2 7

Please refer to the response to comment 23-65. Please note that the city has indicated that its water could be supplied to the Presidio for contingency and emergency purposes, and therefore such a scenario is unlikely.

5 5 - 2 8 A N D 5 5 - 2 9

Please refer to the master response 13.



5 5 - 3 0

Implementation of the reclaimed water plant as discussed in mitigation measures WS-2 and WT-1 would make the building of a desalination plant unnecessary. Refer to master responses 13 and 14.

5 5 - 3 1

A water reclamation plant is the key supply-side solution that would be established under mitigation measure WS-2. Refer to master response 13.

5 5 - 3 2

Such an alternative is infeasible for the reasons provided in Section 2.2.3, Remove LAMC and LAIR and Restore to Natural Conditions.

5 5 - 3 3

See master response 20.

5 5 - 3 4

Alternatives 1 and 6 do not have an underground garage, so this option is covered in the Draft EIS. The purpose of the proposed underground garage is to maximize the amount of green space on the 23 acres. Surface parking for the estimated demand of 1,328 spaces in Alternative 1 would require approximately 11 acres, or about half of the site. This alternative would undoubtedly preclude any major open space enhancements on the site.

5 5 - 3 5

While the use of transit and vanpooling through a TDM program (refer to mitigation measure TR-8) would be strongly encouraged, a mandatory program is not practical since some Letterman Complex employees would have difficult access to either transit or vanpools. In addition, it would not be fair to single out Letterman Complex tenants for such restrictions unless all other employees in the park were subject to the same constraints. The EIS preparers are not aware of any facility in the Bay Area where compulsory use of vanpools or transit has been mandated. See master response 19.

5 5 - 3 6

See master response 18.

5 5 - 3 7

The GMPA anticipated that Gorgas Avenue would continue to be an entrance to the Presidio, primarily to service vehicular traffic into the LAMC/LAIR parking area and that the Gorgas Avenue/Lyon Street intersection would be redesigned to remedy safety issues. In addition, the GMPA stated that in the future, "Gorgas Avenue may be closed to private vehicles beyond the Letterman parking access points, to permit safe pedestrian and service access and create a more campus-like environment." Given the revised intersections at Richardson Avenue recommended as mitigations for Alternatives 2 through 5 (see master response 18), the revised parking access points would move approximately 350 feet to the west. However, most of the length of Gorgas Avenue would be unchanged from the GMPA concept. None of the alternatives would close Gorgas Avenue to traffic. The Final EIS analyzes the effects of each of the alternatives on historic streetscapes in Sections 4.1.8 through 4.6.8 (Cultural Resources). This includes analysis of the historic Gorgas Avenue streetscape.



5 5 - 3 8

See the response to comment 32-5 regarding tour bus access. Providing tour bus parking at the Letterman Complex is not expected because it is not a tour bus destination. Shuttle buses would be internal to the Presidio and would not park in the Letterman Complex. Shuttle bus stop locations would be designated as part of the Letterman site planning process.

5 5 - 3 9

Refer to master response 18.

5 5 - 4 0

One alternative to the two new intersections proposed on Richardson Avenue that would provide the same level of accessibility includes a grade-separated structure (i.e. flyover ramps), which essentially allows for the left-turn movements without stopping the opposing flow of traffic. However, these would have significant impact on the immediate environment, especially historic structures in the area. Alternative locations for a new or improved access point are restricted by the historic value of the Presidio wall and the park's gates. In addition, other existing Presidio gates are located in residential neighborhoods which do not have infrastructure to effectively and safely accommodate the amount of traffic that would be generated at the 23-acre site. See master response 18.

5 5 - 4 1

See master response 21.

5 5 - 4 2

Refer to master response 19 for discussion of mode split and Transportation Demand Management. Peak hour traffic volumes forecast for the Presidio gates using the assumed automobile mode shares are given in Table D-8 in Appendix D of the EIS. These show a total p.m. peak-hour traffic entering and exiting all gates to be 7,850 to 8,300 (8,050 for the preferred alternative). This compares to 1998 volumes of approximately 6,000 (NPS 1999f). Thus, there would be approximately a 33 percent increase in traffic over 12 years.

5 5 - 4 3

No funding source is currently identified for this project. Alternatives to the design shown in the EIS would be identified and studied as part of the Caltrans Project Study Report (PSR) process (see master response 18).

5 5 - 4 4

There is currently no agreement with Caltrans on the proposed intersection. Such an agreement would come upon satisfactory resolution of the PSR and permitting process (see master response 18).

5 5 - 4 5

See the response to comment 55-43.

5 5 - 4 6

See the response to comment 55-43.



5 5 - 4 7

The new intersections on Richardson Avenue/Gorgas Avenue proposed as part of Alternatives 2 through 5 (mitigation measure TR-1, *Lyon Street/Richardson Avenue/Gorgas Avenue Intersection Improvements*) would become the primary entrance and exit to the Letterman Complex, while the primary access to the rest of the Presidio from the east would remain at Lombard Street. As such there would not be any reversal of travel patterns in the vicinity of the Presidio. The new intersections would allow traffic generated by new uses at the Letterman Complex to remain on the major arterials such as Richardson Avenue, rather traveling through residential streets to access the Lombard or Marina gates.

5 5 - 4 8

Table III-2 of Presidio Transportation Planning & Analysis Technical Report: A Supplement to the GMPA (NPS 1994b) does not indicate that the intersection of Doyle Drive/Marina Boulevard/Lyon Street operates at LOS F. Rather, the report identifies the intersection of Mason Street/Marina Boulevard/Lyon Street/Doyle Drive as operating at an overall LOS E, and the most congested approach (westbound through movement) operating at LOS F during the p.m. peak hour. All other approaches are indicated to operate at LOS B or A. Part of this intersection is stop-controlled (Mason Street/Marina Boulevard/Lyon Street), while another is signalized (Doyle Drive/Marina Boulevard/Lyon Street). Although it is not clear what methodology was used for the analysis in the GMPA, the intersection is analyzed as a single intersection in this EIS.

Because the methodology for analyzing signalized intersections is distinctly different from the methodology for analyzing unsignalized (stop-controlled) intersections, the EIS analyzes the two parts of the intersection separately. The intersection of Doyle Drive/Lyon Street/Marina Boulevard is signalized and is analyzed with the appropriate procedure for signalized intersections as outlined in the Highway Capacity Manual (Transportation Research Board 1994). The signalized intersection operates at an overall LOS B during the p.m. peak hour. The intersection of Mason Street/Marina Boulevard/Lyon Street is an unsignalized intersection with Lyon Street stopping, and is analyzed accordingly. The most congested approach of this intersection was found to operate at LOS B. Field observations confirmed that the westbound approach (Marina Boulevard) does not currently operate at LOS F.



Letter 56

PRESIDIO TRUST REC'D
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August 2, 1999

NEPA Compliance Coordinator
Attn.: Letterman Complex
The Presidio Trust
34 Graham St.
P.O. Box 29052
San Francisco CA 94129

Dear Sirs:

These comments on the Letterman Complex Draft Supplemental Environmental Impact Statement are submitted by Michael Alexander and Kent Fickett. Mr. Fickett is a member of the Sierra Club's National Energy Committee, and is past vice president for conservation of the Mt. Diablo Audubon Society.

These comments are limited to sustainability issues involving the Letterman Complex. They are based on the observation that no semi-finalist in the Letterman competition had a lock on good sustainability proposals and concepts. We reviewed all the ideas with the view that the best, from whatever source, should be incorporated into the contract with the developer who actually builds the Letterman Complex. We urge the Presidio Trust ("the Trust") to do so.

In reviewing sustainability in the EIS Alternatives, we had to refer to the concept proposals of the semi-finalists. Since Alternatives 2, 3, 4 and 5 match the concept proposals, these comments will call them by the names of the developers: in turn, Lennar; Walsh-Higgins; Shorenstein; and Lucas (now chosen by the Trust as its Preferred Alternative).

56-1

GOALS. The clearest and most comprehensive goal statements are by Lennar and Shorenstein, with Walsh-Higgins next and Lucas, last. The Trust should incorporate the best of the Lennar and Shorenstein goal statements into its contract. The contract needs to reinforce them, by translating them into specific, positive incentives for performance.

The pattern of building construction is to comply with the spirit of Title 24 at the design and permit stages. However, construction often produces variances with sustainable practices. The Trust will need to allocate adequate resources to monitor compliance with sustainable issues through construction and startup. As you will see, we also recommend a Sustainable Budget Monitoring System, which should be included in the Goals statement.



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SITE PLANNING.

Building orientation. All buildings should have their long facades oriented north/ south, to maximize daylight and solar heating in winter. 56-2

Sun screening. Walsh-Higgins had it right— trees south of buildings should be deciduous, to maximize winter daylight and solar heating. The moderate coastal climate of the Presidio site requires air conditioning on only a few days a year. Energy lost to air conditioning on those days will be far less than solar heat gained, particularly in winter. 56-3

Landscaping. Shorenstein has the best program. The key is maximum use of low-water species of native plants. Lucas's suggestion of adding water-retaining soil amendments is worthy, but its proposal for a large lawn is much less so, and the EIS should compare its impacts to alternative landscapes. Lawns, even non-monoculture, require large amounts of irrigation and significant energy for mowing and other maintenance. If a meadow is chosen as a major landscape feature, hardy native bunch grasses should be considered instead of lawn grasses.

The EIS should investigate the opportunity presented by the pre-twentieth century Letterman landscape. According to the Presidio Draft Vegetation Management Plan, the Letterman Complex north of the present L AIR building was a wetlands. Instead of a lawn, Letterman's new landscape could be a logical extension of the Crissy Field wetlands, connecting as well to the lagoon at the Palace of Fine Arts ("PFA") which is the remnant of the original wetlands. This landscape would provide a spectacular national park entry landscape to people on Richardson Ave., Doyle Drive, and Crissy Field. It should be created as part of the reconstruction of Doyle Drive. 56-4

Should a wetlands extension prove infeasible, the EIS should consider and analyze a retention basin that could hold heavy runoff, then drain it to the PFA lagoon or the Crissy Field wetlands. Every effort should be made to connect these water features. Providing the PFA lagoon, now a freestanding and biologically unhealthy pond, with an inlet and outlet would have significant benefits for the Trust and San Francisco.

We find great merit in the concept and design of the wet/dry waterway which Walsh-Higgins proposed as a feature of its central commons.

Storage. The basement cistern proposed by Lucas and Lennar warrant serious study and analysis, but the water should be used as described above, and not for lowest-priority irrigation. 56-5



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Recycling. Runoff should be collected and processed for wetlands and non-potable uses. Shorenstein's specific suggestions are excellent: silt and oil separators throughout the site, storm drainage designed to work with the future expansion of the Crissy Field wetland and the Tennessee Hollow drainage restoration. 56-6

BUILDING DESIGN.

Passive solar. Along with the usual thermal mass, shading, glazing, insulation and infiltration controls, the design should incorporate reflective passive lighting systems to direct daylight to the shaded sides of buildings. 56-7

Active solar. Lennar has it: photovoltaics on south-facing roofs. The EIS should also consider the benefits of using thin-film photovoltaics on sunny walls. 56-8

Daylighting. Lucas and Lennar offer the most comprehensive ideas. The key is narrow buildings with maximum penetration of filtered daylight. 56-9

Ventilation. Operable windows are a natural for this climate. They need to be backed up by a system that monitors windows that have been left open when air conditioning or heating comes on. Control can be active (auto-close windows), or passive (maintenance people tour the building to close the windows). 56-10

Lennar offers the most comprehensive ventilation program. Lennar and Lucas's raised floor plenums are excellent, providing better ventilation and more flexible space use and cable reconfiguration. Proposals to pre-cool the concrete floor slab, and Lennar's use of a concrete rubble thermal mass store under the building are highly commendable, but need careful investigation of results at sites where they have been used before.

Heating and cooling should be integrated with on-site co-generation units using fuel cells.

Energy. Lucas's use of microturbines for on-site generating capacity should be discouraged in favor of fuel cells. 56-11

Lighting. Walsh-Higgins is correct: low ambient light plus task lighting, with sensors to adjust light levels to available daylight.. We don't know if Lucas's total connected lighting load target of 0.8 watts per square foot is the right number or not, but it is the wrong approach. Instead, 56-12



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design should begin by asking, 'how much workspace can be illuminated with passive daylight?
 Then add task lighting as needed] 56-12

Building Performance Modeling. Lennar's is the best program, though we're unfamiliar
 with the project being developed by the Center for Built Environment at UC Berkeley. See also the
 enclosed Sustainable Budget Monitoring System.] 56-13

Financial Analysis. Life cycle costing is great, but the Trust must know the assumptions,
 including how many years. Depletion allowances should be factored in. Mr. Fickett recommends
 consultation with Resource Economists Dr. Darwin Hall, University of Long Beach, (562) 985-
 5045; and Dr. Jane Hall, California State University Fullerton, (714) 278-2236.] 56-14

LEED building rating. The level to be achieved should be part of the contract.] 56-15

Grey water. Opportunity should be maintained for connection to the San Francisco grey
 water system.] 56-16

DECONSTRUCTION. All are good. Shorenstein is most comprehensive.] 56-17

CONSTRUCTION MANAGEMENT. All provide the right buzzwords, but compliance
 monitoring is crucial] 56-18

MATERIALS SPECIFICATION AND PROCUREMENT. The best statements are by Lennar
 and Shorenstein. Lucas is disappointingly vague. Shorenstein proposes a minimum of 20-25% fly
 ash content for concrete. Fly ash is a by-product of burning coal. If its use just reduces a store of
 waste, it is beneficial. If instead or in addition it builds a market for increased use of coal, it is not
 beneficial.] 56-19

BUILDING / ASSET MANAGEMENT AND OPERATIONS.

Landscape maintenance. Design is key to minimizing maintenance costs and use of
 pesticides, herbicides and fertilizers. The "Golf and the Environment" standards and practices
 which have been adopted by the Arnold Palmer Co. at the Presidio Golf Course may prove to be
 good guides.] 56-20

Alternative Transportation. All provide large parking lots, even if underground. The Trust's] 56-21



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contract should include standards for ride share, car pools, van pools and taxi programs. On-site photovoltaics can provide fuel for electric cars. Shorenstein's bicycle program is the most complete and commendable, as is the rest of its alternative transportation program. 56-21

The Trust should contract with Golden Gate Transit to have empty buses traveling in the non-rush direction during peak hours instead carry passengers between downtown transit nodes and the Presidio. These empty buses already travel on Doyle Drive, right through the Presidio. They are a valuable resource being wasted. They are a far better choice than asking Muni to duplicate Golden Gate's service by increasing the frequency of parallel express routes. Muni's scarce resources should be used elsewhere where demand is high. On the other hand, Muni's local routes need to provide better Presidio service. 56-22

DEMONSTRATION TECHNOLOGY. Shorenstein's use of the Environmental Operations Manager as a consultant for selection of office equipment, transportation options, etc. is excellent and should be part of the Trust's contract. Walsh-Higgins's study of use of fuel cells and photovoltaics are part of recommendations above. 56-23

EDUCATION. Lennar and Shorenstein's proposals should be in the Trust's contract.

In addition, the developer should implement a program to educate construction workers on the sustainable building habits and construction practices they are employing at Letterman, transferring those skills to future jobs. Along with incentives for timely performance, there should be bonuses and penalties (liquidated damages) explicit in the contract, so that the contractor monitors subcontractors. Time bonuses should not come at the expense of slipshod environmental practices. 56-24

Included in these comments is the outline for a Sustainable Budget Monitoring System which will help keep the Letterman Complex sustainable through its lifetime. 56-25

Thank you for the opportunity to comment on the Letterman Complex Draft Supplementary EIS. We hope these comments prove useful to the Trust and that their provisions become part of the EIS and of the awarded contract.

Yours sincerely,



Michael Alexander



Kent Fickett



Responses to Comments in Letter 56

5 6 - 1

Thank you for your proposal for a Sustainable Budget Monitoring System (due to its length, the commentor's proposal has not been included in this document, it is available for review at the Presidio Trust library). The proposal provides implementation steps to fulfill the goal of environmental sustainability for the project (as discussed in Section 1.3.9, Environmental Sustainability) and would be considered as planning proceeds. Please refer to letter 35 prepared by the sustainability and green building services consultant with the development team for the Digital Arts Center. In the letter, the commentor addresses techniques that would be employed to meet the Presidio Trust's sustainability goals. Should the preferred alternative be selected, the Presidio Trust would work with the consultant during planning, design, and construction of the project to ensure that these and other practices are incorporated into the final product to ensure it is a model of sustainable development. It should be noted that using the U.S. Green Building Council's LEED rating, the proposed design would achieve a Gold rating (meaning that the project would be one of the highest performance green buildings in the country).

5 6 - 2

While the longest building façades for Alternative 5 are east- and west-facing, these spans are predominantly circulation spaces. The primary occupied spaces are on north and south façades in thin-profile, daylit buildings. With approximately 900,000 square feet, this would be a "load-dominated" structure, so cooling would be a year-round concern and solar heating would be less desirable than in smaller "skin-dominated" structures.

5 6 - 3

With a "load-dominated" structure, the design for Alternative 5 would attempt to maximize daylighting while moderating thermal gain. Air conditioning uses electricity, the most economically and environmentally costly form of energy, so the use of operable windows, displacement ventilation and natural cooling to respond to the very favorable climatic conditions would aid to reduce electrical usage.

5 6 - 4 AND 5 6 - 5

The lawn would serve as a public gathering and event space for activities that would have higher traffic patterns than native bunch grass can sustain. Mixed species turf with the soil amendments, cistern/water feature rainwater capture system, and demand management watering would significantly improve the water budget profile. Research indicates that the shoreline of the pre-Panama Pacific International Exposition wetland appears to have been somewhere at the base of the 23-acre site on or below Gorgas Avenue. Alternative 5's proposed water feature would reintroduce surface water to the site. Restoration of a full wetland system, while an intriguing idea, would require the removal of buildings and streets that is beyond the scope of the project or the site boundaries. These design details would be further studied in the design review process for consistency with the Planning and Design Guidelines.

5 6 - 6

Comment noted. Any storm-water runoff that would not be captured and used onsite would drain into the restored Crissy Field wetlands. The discharged water would comply with applicable water quality standards.

5 6 - 7

Alternative 5's building design entails extensive consideration of thermal mass, shading glazings, insulation, and infiltration. Given the courtyard configuration, light shelves and similar light bouncing designs would be used to maximize daylighting performance. Vertical reflective systems would create glare problems in this context.

5 6 - 8

Integrating photovoltaics into roofs would be investigated in the design process. Thin-film panels on walls may not be compatible with the historic character of the complex.

5 6 - 9

The EIS preparers agree because lighting would be one of the project's biggest energy loads.

5 6 - 1 0

Operable windows are essential, and with a displacement ventilation design, do not create the pressure balancing problems usually associated with conventional diffusion ventilation. Energy management strategies for the DAC would respond to window operability.

Onsite co-generation may be explored as a separate Presidio Trust project subject to additional planning and environmental analysis.

5 6 - 1 1

A number of distributed generation options (photovoltaics, fuel cells, micro-turbines and others) would be studied during the design development process to determine possible load matches and waste heat capture applications for the preferred alternative.

5 6 - 1 2

Alternative 5's design is based on a daylight structure and a responsive task/ambient lighting strategy. Experience with these systems has shown that the design would likely have a total connected lighting load of 0.8 watts per square foot, and an operating (or "as used") load around 0.4 watts per square foot.

5 6 - 1 3

Modeling and full commissioning are essential to optimize building performance and would be a crucial part of the project's design/construction/operation process. See also the response to comment 56-1.

5 6 - 1 4 A N D 5 6 - 1 5

Comments noted.

5 6 - 1 6

Please refer to master response 13.

5 6 - 1 7 A N D 5 6 - 1 8

Comments noted. The Presidio Trust agrees with the commentor that a monitoring program is important.



5 6 - 1 9

The design of the project is still in a conceptual stage, so it would be inappropriate to attempt to list significant materials specifications at this time. As the design for Alternative 5 develops, there would be consideration of sourcing, embodiment, indoor environmental quality, durability, and other issues related to building material choices, consistent with the Planning and Design Guidelines.

5 6 - 2 0

Comment noted.

5 6 - 2 1

Comment noted. The TDM plan worked out by the Trust and the selected development team would include standards of service. Electric vehicle charging stations would be in the Letterman Complex as well as other areas of the park. See master response 19.

5 6 - 2 2

See the response to comment 46-5.

5 6 - 2 3

Comment noted.

5 6 - 2 4

Contractor education is crucial, and along with performance programs, such measures are essential to achieving high-quality buildings.

5 6 - 2 5

Please refer to the response to comment 56-1.

Letter 57

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

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

Sent: Tuesday, August 03, 1999 1:40 AM

To: presidio@presidiotrust.gov

Subject: From Star Alliance: Letterman Public Comment + Web Site feedback

Greetings of peace.

First of all here is some feedback about the web site: It is very attractive overall, and excellent to have a web site map (First one I've seen). However, I could not readily find what I needed in a hurry: the Letterman Environmental Impact Report. I scanned the main menus twice and went to "Environmental" but found only the general ideals. Is it under "News?" Why not have a main menu heading for EIR's since they are such a major feature for public review and comment? Sorry, I must now cut to the chase and dash this off.

57-1

Representing Star Alliance — the Universal Star Alliance Foundation (world peace group) — we would like to make several key points re the Letterman choice:

* Despite being very impressed with the Interland et al proposal as well, we are cautiously delighted with the Trust's choice for the Lucas Digital Arts Center. Delighted in that it holds the potential for such powerful support to non-profit organizations attempting to better the world through modern media. Cautious in wondering whether that potential will be fully and fairly realized.

Also, while acknowledging the genius and value of the "Force" themes, etc., we would be more than a bit concerned about the ongoing "wars" theme emphasis of many of the Lucas productions; hoping they will transition to more subtle and peaceful themes as time goes on, perhaps popularizing the idea of a successful "universal war on war" campaign.

57-2

* We would emphasize the responsibility involved to give back to the public from a business allowed to locate at such a fabulous piece of public real estate — to give back in ways that improve the daily quality of life for people everywhere.

* We were delighted to note the key line in the most recent "Star Wars" episode, where young Luke Skywalker propounds: "The main trouble with this universe is that people don't help each other enough!" Here here.



* May we strongly affirm (or suggest) that the Digital Arts Center be encouraged (and in fair and effective ways required) to assist many non-profit organizations, ideally small ones as well as large established operations, in realizing their important goals. One way would be to assist in further conceptualizing, planning and executing the comprehensive Star Alliance vision of a universal Citizens' Cooperation and Media Network. As we see it, this would tend automatically to be inclusive and encouraging of widespread opportunities for public training and positive, creative expression.

57-2

Gratefully yours for all of our "Highest Common Ideals,"

Peter B. DuMont
Director, Star Alliance
unistars@aol.com
Tel: 510-540-8887
(P.S.: Our beginning web site may be found at www.staralliance.net.)



Responses to Comments in Letter 57

5 7 - 1

The Presidio Trust provided the Draft EIS the highest visibility possible on its web site by placing directions to the document on the Presidio Trust's home page "banner" which stated "to view the Letterman Draft Supplemental Environmental Impact Statement, click on Library, then Postings."

5 7 - 2

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

Letter 58



FEHR & PEERS ASSOCIATES, INC.
Transportation Consultants

PRESIDIO TRUST REC'D

1999 JUL -31 A 10:17

3685 Mt. Diablo Blvd., Suite 301
Lafayette, CA 94549-3763

925 284-3200 • Fax 925 284-2691
fehrandpeers.com

July 30, 1999

NEPA Compliance Coordinator – Attn: Letterman Complex
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, California 94129-0052
FAX: 415/561-5315

**Subject: Presidio Letterman Complex
Draft Environmental Impact Statement, April 1999**

Dear NEPA Compliance Coordinator:

For the record, we wish to note the following text corrections in the EIS:

Section 4.5.7.1 (EIS, page 164) states "...Gorgas Avenue Gate traffic would increase 470 vehicles during the PM peak hour, with project-generated traffic comprising 84 percent of the growth."

58-1

According to Table D-7 (EIS Appendix D page D-7) the Alternative #5 project would generate 260 vehicle trips at the Gorgas Avenue Gate during the PM peak hour. This level of traffic represents 55 percent of 470 vehicles not the 84 percent indicated in the EIS.

Section 4.5.7.3 (EIS, page 165) states "... The parking demand of 1,260 spaces would primarily consist of long-term employee parking (1,080 parking spaces) and some short-term visitor spaces (180 parking spaces). The parking demand of 1,260 spaces would be substantially less than the proposed supply of 1,530 spaces, resulting in a surplus of 270 spaces."

58-2

Parking calculation worksheets in Appendix B of the Wilbur-Smith Traffic Study indicate the basis for Alternative #5 long-term parking demand as 769,000 square feet. Vehicle trip generation worksheets in the same appendix indicate that vehicle trip generation was based on 900,000 square feet. Using 900,000 square feet, as the basis for determining long-term employee parking would result in the need for 1,260 long-term employee parking spaces, not the 1,080 indicated in the EIS. Furthermore, the EIS does not take into account additional





FEHR & PEERS ASSOCIATES, INC.
Transportation Consultants

NEPA Compliance Coordinator – Presidio Trust
July 30, 1999
Page 2 of 2

spaces beyond parking demand to account for parking circulation. Typically, 5 to 10 percent more spaces than projected demand are provided at employment centers so that drivers can find an available parking space without re-circulating through the parking area numerous times searching for an available space.

58-2

Combining the parking numbers using 900,000 square feet results in 1,440 spaces (1,260 long-term spaces, 180 short-term visitor spaces). Applying a 5 percent circulation factor brings the total needed supply up to 1,510 parking spaces.

Text Corrections (Traffic Study)

a. Traffic Study (Table 1.5) the subtotal for on-street parking should be 66 percent not 22 percent.

58-3

b. Traffic Study (Page 2-6) the first paragraph states that Alternative 5 would generate about 1,150 more vehicle trips than Alternative 1. Actually, Alternative 5 generates 506 fewer daily vehicle trips than Alternative 1. Alternatively, the authors may be referring to Alternative 4, which generates significantly more vehicle trips than Alternative 1.

58-4

c. Traffic Study (Page 3-33) the 82X-Levi Plaza Express line serves commute connections to BART, AC Transit, Ferry, and Caltrain.

58-5

We hope this information proves useful in your evaluation of the Letterman Digital Center proposal. If you have any questions or comments, please call me at (925) 284-3200.

Sincerely,

FEHR & PEERS ASSOCIATES, INC.

Robert E. Rees, P.E.
Senior Associate

4A/991-1324



Responses to Comments in Letter 58

5 8 - 1

In response to the comment, the error has been corrected, and the second paragraph of Section 4.5.7.1 has been revised to reflect the changed text.

5 8 - 2

In response to the comment, the parking demand for Alternative 5 has been revised to ensure uniformity of analysis across all alternatives. The Trust recalculated parking demand using 900,000 square feet, as was done for the other alternatives, as the basis for determining long-term parking demand. The recalculation resulted in total parking demand for Alternative 5 of 1,440 spaces. For further discussion, please refer to master response 20.

5 8 - 3

In response to the comment, the table in the background traffic study has been corrected.

5 8 - 4

The text on page 2-6 of the background traffic study has been corrected in response to the comment.

5 8 - 5

In response to the comment, the text in the background traffic study has been revised to indicate that the 82X-Levi Plaza Express MUNI line would serve commute connections to the Ferry Terminal.

Letter 59

the
**SAN FRANCISCO
PARTNERSHIP**
Growing Business and Jobs

PRESIDIO TRUST REC'D

1999 AUG 10 10:21

Board of Directors

Donald G. Fisher
GAR, Inc.
Chair,

August 2, 1999

David S. Pottruck
The Charles Schwab Corporation
Chair-Elect,
The San Francisco Partnership

Mr. John Pelka
NEPA Coordinator
Presidio Trust

Mara Brazer
President,
The San Francisco Partnership

Attn: Letterman Complex
P.O. Box 29052
San Francisco, CA 94129-0052

Richard J. Fineberg
Deloitte & Touche LLP
Treasurer,
The San Francisco Partnership

Dear Mr. Pelka:

Lucasfilm Ltd.'s Letterman Digital Center will provide a tremendous boost to San Francisco's economy and jobs base, as well as to the community. I believe it will greatly enhance and fulfill the objectives of the Presidio Trust's General Master Plan.

Tom Ammiano
President,
San Francisco Board of Supervisors

Eunice J. Azzami
Korn/Ferry International

Ralph H. Baxter, Jr.
Orrick, Herrington & Sutcliffe LLP

Willie L. Brown, Jr.
Mayor, City and County
of San Francisco

First, Lucasfilm's digital innovations will spur the development of other digital media companies in San Francisco, while also providing business to new media companies already clustered here in such fields as online and pc-based education, entertainment, video, post-production and others. The Presidio will be able to attract such companies to other sites, if it wishes.

Jay Cahill
Cahill Contractors, Inc.

James W. Callaway
Pacific Telnet

John W. Larson
Brobeck, Phleger & Harrison

Matthew Le Merle
A. T. Kearney

Nelson C. Rising
Catalus Development Corporation

Second, digital media jobs are jobs of the future – and, with specific training, can employ thousands of unemployed or underemployed San Franciscans at rates of pay much higher than other industries pay at the entry level. This is of great benefit to the community. San Francisco had an industrial-based economy that is disappearing; new and digital media companies, growing at a rate of more than 50 percent per year, are quickly shifting our economy into being technology-based. The Letterman Digital Center will ensure that these jobs are maintained in San Francisco and that San Francisco offers thousands of well-paying jobs for all skill levels.

Richard M. Rosenberg
Bank of America

G. Rhea Serpan
San Francisco Chamber of Commerce

Lucasfilm's Letterman Digital Center will provide prestige to the Presidio with a "clean" industry that's global and future-oriented. San Francisco will be fortunate to have the Center as a magnet to attract new jobs.

Douglas W. Shorestein
The Shorestein Company

Gordon R. Smith
Pacific Gas and Electric Company

Karen Wegmann
Wells Fargo Bank

Sincerely,


Mara Brazer
President

59-1

303 Sacramento Street, 2nd Floor San Francisco, CA 94111
phone (415)364-1799 fax (415)982-6733 email info@sfp.org web http://www.sfp.org



Response to Comment in Letter 59

59 - 1

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



Letter 60

FRIEDMAN FLEISCHER & LOWE LLC

One Maritime Plaza, 10th Floor
San Francisco, California 94111
Telephone: (415) 445-9850
Facsimile: (415) 445-9851

PRESIDIO TRUST REC'D

1999 JUL -31 A 10:23

July 30, 1999

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

The Letterman Digital Center will help the Presidio Trust meet the objective of financial sufficiency and will attract organizations that have uses similar to the Letterman Digital Center such as community service, the arts, education and innovation that will achieve the objective of the General Management Plan.

As an investment banker, I have a great deal of experience watching and assisting the growth and development of industries throughout the world.

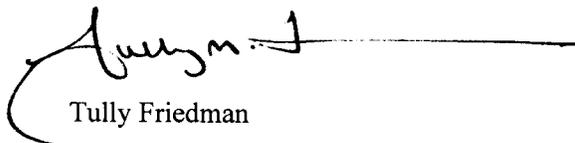
Today, long-term planners, scholars and entrepreneurs, among others, are closely examining the potential of the digital revolution. Most agree that the digital revolution will have an impact on our world surpassing that of the industrial revolution. It already is propelling the most rapid development of new products and ideas in the history of the world. The digital revolution requires "centers of excellence" like the one being proposed at the Presidio.

60-1

History has taught us that an organization with the critical mass of connected, educated, leading-edge thinkers and doers gathered to build the breakthrough technologies and applications for the digital revolution will attract other similar organizations. The Letterman Digital Center will enhance the opportunities for the Trust to rent to profit and non-profit organizations that want to be part of the digital revolution.

The Letterman Digital Center will not only help the Presidio meet the objectives of General Management Plan through the activities at its facility. The Letterman Digital Center will also attract other organizations that will contribute to reaching these goals.

Sincerely,



Tully Friedman



Response to Comment in Letter 60

6 0 - 1

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

