Letter 61

United States Department of the Interior
NATIONAL PARK SERVICE
Presidio of San Francisco
P.O. Box 29022
Building 102, Montgomery Street, Main Post
San Francisco, California 94129

IN REPLY REFER TO:
L76 (GOGA-RMPPC)

August 12, 1999

The Department of the Interior submitted a letter with identical comments to those contained in this letter submitted by the National Park Service. As the two letters are essentially identical, only one letter is reprinted here. Both letters are available for review at the Presidio Trust

Mr. Jim Meadows
Executive Director
The Presidio Trust
34 Graham Street
PO Box 29052
San Francisco CA 94129-0052

Re: National Park Service Comments, Draft Letterman Supplemental Environmental Impact Statement

Dear Mr. Meadows:

The National Park Service (NPS) has completed its review of the Draft Environmental Impact Statement and Planning Guidelines for the Letterman Complex (DEIS). For this proposed project, the NPS has the status of a "cooperating agency," as defined by the National Environmental Policy Act (NEPA) based on NPS knowledge of Presidio resources and the continued management and service responsibilities of the NPS within the Presidio (40 CFR §1508.5).

In our role as the cooperating agency, NPS has had opportunities to review and comment on the DEIS during its preparation. We appreciate your having met with us to discuss the planning process instituted by the Trust and issues regarding the scope and content of the DEIS. We provide below our remaining questions and concerns. Additional specific comments are included as an attachment.

Comprehensive Management Plan. The Presidio Trust enabling legislation specifically requires the Trust to prepare a Comprehensive Management Program for Area B of the Presidio (Public Law 104-333, Section 104(c)). We understand that the Trust is now considering the development of this comprehensive plan; however, with the Letterman planning nearly completed, Letterman and other site specific planning (including the Main Post and Public Health Service Hospital) are going forward without the benefit of a broader vision of the overall use and protection of this National Park, including the National Historic Landmark District, and its natural and cultural resources. 61-1

Our most fundamental concern continues to be with the process being established by the Trust to implement development at the Presidio. Without a Comprehensive Management Program, the Trust has chosen to tier the Letterman EIS off of the NPS' 1994 General Management Plan Amendment (GMPA) EIS for the Presidio even though the DEIS for the Letterman Complex

departs in large part from the scale of development foreseen in the GMPA. The GMPA is a broad, Presidio-wide planning document. Accordingly, the assumptions in the GMPA EIS are relevant only when viewed in the context of the Presidio-wide plan it analyzed. If the Presidio-wide planning assumptions have been set aside, the analysis for a specific planning area, such as Letterman, will no longer be an accurate predictor of impacts in the Presidio. That is, the GMPA EIS, as a baseline document, will no longer be applicable to future NEPA analyses, including the Letterman SEIS.

The Trust's choice to use the GMPA EIS as the baseline document from which to tier the DEIS requires, at a minimum, that the DEIS identify and evaluate where the proposed Letterman project is consistent and inconsistent with the GMPA EIS in the context of the Presidio-wide planning assumptions included in the GMPA EIS. The impacts of any and all inconsistencies need to be evaluated, and mitigation for such impacts proposed in the DEIS. 61-1

The DEIS inadequately evaluates the areas of departure from the GMPA EIS and fails to assess many project-specific impacts that do not fall within the scope of the general planning concepts evaluated in the GMPA EIS. The attachment provides a list of the Presidio-wide and region-wide cumulative impacts of the Letterman proposal that have not been evaluated.

National Historic Preservation Act. The National Historic Preservation Act (NHPA) requires analysis of the cumulative effects of development projects on the National Historic Landmark (NHL). Reliance on the GMPA EIS analysis is inappropriate where, as in the Letterman proposal, the land use development concept for the GMPA individual planning area has been substantially changed. Moreover, two significant requirements of the NHPA are triggered by the proposed Letterman project – Sections 106 and 110. These sections require evaluation of all adverse effects of the proposed project on the NHL. As described in the DEIS, Alternatives 2 through 5 would have adverse effects on the NHL and, as such, require notice of such impacts to the Advisory Council. The Trust must consider the Council's comments in reaching the final decision on the proposed project.

Reliance on a draft version of the Planning Guidelines as a mitigation measure is inappropriate; the DEIS provides no information on the Trust's future plans for drafting and adopting the final Planning Guidelines nor on the public's role in such process. While final Planning Guidelines may mitigate some of the proposed project's adverse impacts, the NHPA requires evaluation of the impacts of the proposed project *as currently proposed* (e.g., without application of the Planning Guidelines). Among other things, the impact assessment must consider the placement of the new structures in the NHL and specifically describe the potential impacts. The single admission that Alternative 5 "would not be compatible with the adjacent structures" is not an adequate assessment. Finally, the impacts of the Draft Planning Guidelines are not assessed in the DEIS. Implementation of the Guidelines for the 60-acre planning area would have impacts separate and apart from the proposal currently being considered. A separate alternative analysis and impact assessment for the Guidelines should be prepared prior to their consideration for adoption. 61-2

Additionally, Section 110(a)(1) specifically mandates that, prior to constructing or leasing buildings, each Federal agency shall use, to the maximum extent feasible, historic properties available to the agency. Accordingly, even if the proposed new construction were designed and sited in such a manner that it will not adversely effect the NHL, the NHPA first requires the

preservation of historic buildings through preferential use of historic buildings for new functions over new construction. The historic properties in this NHL should be reused *to the maximum extent feasible* prior to instigating any new development and base all development decisions on a comprehensive building reuse plan for the entire NHL. 61-2

Public Participation In The Trust Decision-Making Process. The NPS appreciates the public involvement that the Trust has afforded in its selection of a tenant for the Letterman Complex. However, though an inadvertent result, the choice to combine tenant selection and NEPA compliance into one parallel decision-making process has muddled the critical requirement of meaningful public participation (and agency review) by seemingly invalidating the relevance of much of the DEIS. With San Francisco newspapers proclaiming Presidio Trust decisions to preliminarily narrow its focus to two finalists and then finally one, the public and the reviewing agencies faced a decision of how to reconcile the press releases and the proposed DEIS that evaluated five allegedly feasible alternative proposals. Though the Trust issued a Federal Register notice extending the review period and reiterated the continued validity of the three rejected proposals, the overwhelming impression of the public is that only one of the alternatives in the DEIS remained viable. 61-3

Having the benefit of hindsight at this stage, the NPS strongly suggests that the Trust decouple these two critical processes for all future development projects at the Presidio to allow the more typical comparative impact assessment of the selected proposal and modified site plans as project alternatives in a Draft EIS. With regard to the Letterman DEIS, at a minimum, the FEIS should include text descriptions, site plans and visual simulations of modified site plans and present the environmental consequences of the modified site plans. We would prefer to see a process to solicit, compile and distribute public comment on new site configurations presented in the FEIS. 61-4

Finally, the following bullets outline a few issues that the NPS believes are particularly important. Additionally, we have provided an attachment outlining a more comprehensive list of issues identified in our review process.

- **Scope of the EIS.** The DEIS contains two proposed actions -- a development proposal for a 23-acre site and a long-range plan for the larger 60-acre site. The preferred alternative (along with all alternatives 2-5) address only 23 acres out of the 60-acre site. And, while general language in the SEIS and the Planning Guidelines describe resources and issues for the 60-acre site, the Letterman proposal only includes the 23-acre construction site and, presumably, will not provide for the use and continued preservation of the historic structures within the 60-acre site. Moreover, the inclusion of the list of "actions common to all alternatives" appears to increase the boundary of the project site to the full 60 acres. However, the implementation of these additional actions are not included in the assessment of each alternative for environmental effects. The actions are listed and then left unresolved as to impact. This confusion leaves unanswered a critical question: What does this SEIS allow the Trust to do without further environmental/historic preservation analysis? 61-5 61-6

- **Board Resolution 99-11.** The NPS strongly requests that, in order to prevent public confusion, the Trust clearly define the phrase "General Objectives of the GMPA" as a resolution of the Presidio Trust Board (Resolution 99-11), throughout the DEIS. Resolution 99-11 gave the phrase "General Objectives of the GMPA" a specific, very narrow meaning 61-7

which simply cannot be understood without clear presentation. All references to the "General Objectives of the GMPA" should be changed to "Presidio Trust Board Resolution 99-11," which is provided in the DEIS at page 6. This clarification will avoid the natural confusion between Resolution 99-11 and the actual content of the GMPA, specifically the "parkwide principles and concepts" section. 61-7

We have appreciated the cooperation between the Trust and NPS in development of the Draft Planning Guidelines, which is an excellent example of good team work. The NPS would like to implement this level of cooperation on a broader scale in the development/ implementation of future NEPA documents and processes (*e.g.*, participation as part of team in developing impact topics, etc.). We look forward to the establishment of further coordination with the Trust during the design review process for the Letterman Complex and the upcoming NEPA review process on development of the Public Health Service Hospital planning area.

Sincerely,

B.J. Griffin
General Manager, Presidio of San Francisco

cc:
John Berry, Assistant Secretary - Policy, Management, and Budget
Deny Galvin, Deputy Director, NPS
Brian O'Neill, Superintendent, GGNRA
John Reynolds, Regional Director, Pacific West Region

NATIONAL PARK SERVICE
REVIEW COMMENTS
LETTERMAN COMPLEX – DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

NO.	COMMENT	PAGE	SECTION	PARA	
	SELECTION & EVALUATION OF ALTERNATIVES				
1.	In several locations, the DEIS includes the statement that the "GMPA land use concept may no longer be valid." The validity of the Alternative 1 should be determined prior to its inclusion as a project alternative. The Council on Environmental Quality has defined reasonable alternatives as those that are economically and technically feasible (40 Questions 2a). Alternative 1 should meet this test or be included in the discussion of "alternatives considered but rejected."	Title page		¶ 1	61-8
2.	The status of Alternatives 1 and 6 as "feasible alternatives" is unclear given that page 6 states that "The users or tenants must demonstrate an ability to finance the project, including the demolition of the medical center and research institute" and page vii states that the "Presidio Trust has tentatively rejected Alternative 1 and Alternative 6."	iv 6			61-9
3.	The "actions common to all alternatives" described on page 11 are not relevant to the stated need or purpose in the DEIS. According to page 11, all alternatives would include these actions (in the remaining 37-acres of the 60-acre site). The DEIS should explain how these actions fit into the need "to achieve the Presidio Trust Act's mandate that the Presidio Trust be financially self-sufficient by 2013, while managing the Presidio in accordance with the general objectives of the GMPA,...[and] to develop and use mixed use buildings totaling approximately 900,000 square feet within a 23-acre site within the Letterman Complex."	3. 11.	1.2. 2.0	2	61-10
4.	The inclusion of this list of "actions common to all alternatives" increases the scope of each alternative. However, the effects of these additional actions is not included in Chapter 4; this chapter should address the impacts of the full scope of each proposed alternative, including the list of common actions.	11.	2.0		61-11
5.	For each alternative that includes reuse of the basement structures, the DEIS should indicate the allowable total new construction by subtracting the retained square footage of the basements.	12 *ff.*	Table 1		61-12
6.	Include a comparison of alternatives in terms of site plan, density, height, site coverage, etc.	80 *ff.*	Table 9		61-13
7.	State the total available Presidio housing under each alternative, including units to be constructed.	80 *ff.*	Table 9		61-14
8.	The selection of a preferred alternative during the public review process does not afford the public and agencies the opportunity to review and comment on a reasonable range of alternatives to that selected alternative that would typically be included in a DEIS as project alternatives. The FEIS should include text descriptions, site plans and visual simulations of modified site plans and present the environmental consequences of the modified site plans. The Presidio Trust should consider a process to solicit, compile and distribute public comment on new site configurations presented in the FEIS.		Chapter 2		61-15
9.	Need for a Visual Impact Analysis. The Environmental Screening Form (Appendix A) states that impacts on scenic viewing require further analysis in the DEIS and the Draft Planning Guidelines are even presented as mitigation for potential scenic resource impacts. However, the impact analysis for scenic viewing was not included in the DEIS. No graphics were presented to illustrate the visual impact of the various alternatives from the prospective of sensitive viewpoints.		Chapter 4		61-16
	CUMULATIVE IMPACTS – AREA OF POTENTIAL EFFECT (APE)				
10.	Edit sentence, as follows: "The *60-acre planning* area contains approximately 1.3 million square feet in 50 buildings."	iii	Intro.	¶ 2	61-17

NATIONAL PARK SERVICE
REVIEW COMMENTS
LETTERMAN COMPLEX – DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

NO.	COMMENT	PAGE	SECTION	PARA	
11.	The cumulative scenario used as the baseline for the assessment of each cumulative effect in the DEIS should be established by the foreseeable level of development currently anticipated by the Trust (e.g. PHSH and Main Post plans) rather than the GMPA EIS development levels.		Chapter 2		61-18
12.	For each alternative, the assessment of cumulative impacts Presidio-wide and region-wide needs further analysis. Of particular concern are cumulative impacts to: 1) traffic congestion on U.S. Highway 101, 2) traffic levels in the Presidio between Golden Gate Plaza and the development site, 3) parking capacity in Area A, 4) parking in the adjacent neighborhood and the Exploratorium, 5) viewshed Presidio-wide, 6) future restoration of the Tennessee Hollow riparian corridor, 7) water supply Presidio-wide, and 8) water quality in Crissy Marsh.		Chapter 4		61-19
	ECONOMICS /900,000 SF CONSTRUCTION				
13.	State the basis for using the 900,000 square foot figure as the allowable new construction level.	iii, 3	Purpose & Need	¶ 3	61-20
14.	The purpose and need should be expanded to include justification and need for demolition of LAIR.	iii, 3	1.2		61-21
15.	Support the statement that 900,000 sf is the minimum amount of new construction required to achieve economic self-sufficiency.	45	2.8.1	¶ 5	61-22
	"GMPA OBJECTIVES"				
16.	"The Presidio Trust manages . . . in accordance with the purposes of the Act establishing GGNRA and the **general objectives of the Presidio General Management Plan Amendment (GMPA) adopted by the National Park Service in 1994**." (bold for emphasis) Because of the structure of this sentence, it appears that the NPS adopted the Presidio Trust Resolution 99-11. Reword sentence.	iii *ff.*	Summary	¶ 1	61-23
17.	Throughout the document there are references to the "GMPA's general objective to sustain the Presidio indefinitely on an economic basis". This statement does not occur in the GMPA. The reference here and elsewhere should be changed to Presidio Trust Resolution 99-11.	vii 81	Major Conclusions	¶ 1	61-24
18.	"This process produced the 150-page Presidio GMPA, whose general objectives guide the discretion of the Presidio Trust, as well as a 394-page EIS on the Presidio GMPA". This statement implies that Resolution 99-11 guides the GMPA EIS. Rephrase sentence.	xii	Issues to be Resolved	¶ 1	61-25
	CULTURAL RESOURCES				
19.	For each Alternative (1 through 5), the impact assessment for the effect on historic buildings should specifically describe the effect, whether beneficial or adverse, for each alternative. The DEIS must explain *why and how* "new construction would unify the disjointed remnant historical hospital buildings within the ~~23-acre site~~ 60-acre site, and reestablish east/west corridors and viewsheds within the site...." and "have a beneficial effect on the NHL district". This comment applies to each of the eight sections in this Chapter.	ix, 117, 136, 146, 156,166	Major Conclusions (NHL) and 4.1.8.1 through 4.5.8.1		61-26
20.	In their present form, alternatives 2 through 5 do not conform to the land use planning directives in the Draft Planning Guidelines. Judging from the site plans in the DEIS, an adverse effect would result from Alternatives 2 through 5 without the mitigation afforded from the Draft Planning Guidelines. The DEIS should assess and evaluate these impacts before the Mitigation Measure CR-1 is applied. The mitigative effects of applying CR-1 must be explained. The mere conclusion that application would provide protection is unsupported. The DEIS should provide text description and modified site plans for alternatives 2	Chapter 4	4.2.8 through 4.5.8		61-27

NATIONAL PARK SERVICE
REVIEW COMMENTS
LETTERMAN COMPLEX – DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

NO.	COMMENT	PAGE	SECTION	PARA	
	through 5 to demonstrate the protection afforded by Mitigation Measure CR-1.				61-27
21.	Change "An undertaking is defined to include federal actions such as new development and uses within the Letterman Complex . . ." to "An undertaking is defined to include federal actions that can result in changes to the character or use of historic properties, such as new development . . . within the Letterman Complex."	116	4.1.8	¶ 1	61-28
22.	Clarify the finding of adverse impact to Bldgs 1160 and 1151 (and 1152) from the new road between those structures for each alternative. Support conclusion of no adverse effect from this road on the streetscape or the NHL status.	Chap 4 136,146, 156-7, 166	4.2.8 – 4.5.8 and 4.2.8.7 - 4.5.8.7		61-29
	NATURAL RESOURCES				
23.	Confirm whether the outfall from the Letterman Complex will drain directly to the restored Crissy Marsh. Mitigation Measure WQ-1 should clearly state that oil and grease traps would be installed at all catchbasins in the stormwater drainage system.	vii 35	Major Conclusions	¶ 4	61-30
24.	Begin with "An existing historic drainage on the site is planned for restoration. This drainage will flow into the Crissy Field marsh." The DEIS should state here that the landscaping designs for the site include restoring the stream corridor, maintaining stormwater runoff water quality through bio-filtering, and assuring a stream corridor buffer area. The buffer width should be supported by information from technical experts. Clarify the responsibility for implementation of the stream corridor restoration.	ix, 18, B-27, B-37	Major Conclusions 2.0 (Bullet 2) Fig. B-10, Fig. B-11	¶ 4	61-31
25.	As the alternatives include common elements that affect the full 60-acre planning area, add a new section to Chapter 3, Affected Environment, describing the natural resources. Included in this section should be: the hydrologic environment, (*i.e.*, the water tables and the past creek corridor); the existing native oaks; bird nesting information and the values of the palms for birds; bats; the Crissy Marsh and the need to have fresh water inflow but also clean water; and, the water from Lobos Creek being used for the potable water on site.	77	Chapter 3		61-32
26.	Support the statement "The SWPPP would reduce the quantity of stormwater discharged to San Francisco Bay and Pacific Ocean from the site" by stating how and why.	A-7	Storm Drainage (SD-1)		61-33
27.	Instead of stating that this project has no impact on the riparian corridor restoration, it is more appropriate to commit to supporting the restoration plan and participating in its implementation, as part of the project. In the *landscaping plan* section, add that the plan would include the corridor.	A-13	P. Native Plant Communities		61-34
28.	Add the riparian corridor and buffer to these maps.	B-15, B-18	Fig. B-10, Fig. B-11		61-35
29.	Add natural drainage restoration.	B-27	Bullet 2		61-36
	HOUSING				
30.	Indicate total Presidio housing units available under each alternative and provide basis for such calculations.	55, 82 93, 105 D1-2	3.7, Table 9, Table 13, 4.1.5-4.6.5, Appendix D		61-37
31.	What is the current total of housing units in the Presidio? What is the current number of housing units proposed by the Trust? These numbers should form the basis for the cumulative impacts assessment.	55	3.7.1		61-38

NATIONAL PARK SERVICE
REVIEW COMMENTS
LETTERMAN COMPLEX – DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

NO.	COMMENT	PAGE	SECTION	PARA	
	TRANSPORTATION AND TRAFFIC				
32.	For each Alternative (1 through 5), transportation and traffic impacts must be assessed and, if significant impacts are identified, then the level of effectiveness of each proposed mitigation measure must be assessed in clear, quantifiable terms. For example, the effectiveness of the Transportation Demand Management Plan (TDMP) is not addressed. The TDMP is described only in concepts (p.37). There is no evidence of the level of traffic reduction nor that demand would be reduced to a level of less than significant effect.	111	4.1.7.3.		61-39
33.	The traffic impact analysis for Alternatives 2 through 5 relies on the assumption that two new signalized intersections will be constructed on Doyle Drive. NEPA calls for analysis of effects of the projects, as proposed (e.g. unmitigated, under current road configurations). Only after this analysis, should appropriate mitigation be considered. Both the mitigative effects and the adverse impacts of all proposed mitigation must be evaluated (e.g. TR-1, TR-2, TR-3), including construction impacts. The feasibility of the proposed mitigation measures should be considered. For example, DEIS states that the San Francisco Dept. of Parking and Traffic "generally concurred with the plans" for the improvements to Richardson Avenue. It is important to obtain conceptual approval in writing from both the City and Caltrans.	181	5.2.8.		61-40
34.	There is a need for a section that addresses the overall transportation impacts Presidio-wide. The following topics should be addressed: access, trip distribution assumptions, and impacts to the surrounding neighborhoods.	83	Table 9		61-41
35.	The effects of parking fees on other Presidio sites, including Area A, and adjacent neighborhoods needs to be assessed for impacts and mitigation thereto.	94	Table 14		61-42
36.	Clarify jurisdictional boundaries between Presidio, City and Caltrans.	23,26, 30,33, 106 *ff.*	2.2.5, - 2.5.5, 4.1.7, etc.		61-43
37.	Indicate which way the traffic will flow at the new one-way access between Gorgas and Richardson. Show the direction of travel in the figures for Alternatives 2-5.		Fig. 6-9, 14		61-44
38.	Provide analysis of the impacts on the Exploratorium from the proposed new signals on Richardson Ave.		4.1.7 thru 4.6.7		61-45
39.	Clarify why two new intersections are needed. A complete impacts analysis of the project, as proposed, would provide this clarification.	108	4.1.7	¶ 1	61-46
40.	Describe the current and future use of Girard Road and include in the impact assessment.		Chapter 2, 3, 4		61-47
41.	Show the location of surface parking for each alternative, including on-street parking locations.		Fig. 6-9		61-48
42.	Indicate percentage applied to parking share based on "the 23-acre site's share of developed area for the entire complex."	108	4.1.7	¶ 3	61-49
43.	As the effectiveness of TDM and TR-4 measures to reduce parking demand has not been estimated, indicate expected impacts if TDM and TR-4 measures fail. Where might additional parking occur? How will neighborhoods and other Presidio locations be protected from undesirable parking impacts due to Letterman?		4.1.7.3 and 4.2.7.6 through 4.5.7.6.		61-50
44.	Provide a figure showing existing condition traffic volumes on the regional access routes and major roads within the Presidio.	60	3.9.2		61-51
45.	Provide peak a.m. data as well as peak p.m. data conditions throughout the document. It is important that both levels be fully documented and	66, 94-96,	Table 4, Tables 14-		61-52

NATIONAL PARK SERVICE
REVIEW COMMENTS
LETTERMAN COMPLEX – DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

NO.	COMMENT	PAGE	SECTION	PARA	
	analyzed throughout the DEIS. Provide existing and project Level of Service (LOS) data for each approach, as well as overall intersection conditions. It is desirable to be able to determine LOS provided on the Richardson Avenue approaches and side approaches separately.	111	16, 4.1.7.2		61-52
46.	Provide information for anticipated traffic volumes on Gorgas, Lombard, Letterman, O'Reilly and Torney for each alternative.	111, 133, 145, 155, 165	4.1.7.1 - 4.5.7.1,		61-53
47.	Provide LOS information for important perimeter intersections with major Presidio roads under each alternative (such as: Letterman/Lombard under Alt. 2, Edie/Gorgas under Alt. 3, etc.)	page 96 and Chapter 4	Table 16 and discuss 4.2.7.2. through 4.5.7.2.		61-54
48.	The same trip generation rates should be used for CNET and Lucasfilm. What is the justification that CNET is assigned "Office use" generating 18.10 person-trip rate per person, while Lucas is assigned "R&D" generating 11.42 person-trip rate?	D-3	Appendix D		61-55
	WATER SUPPLY				
49.	NEPA calls for analysis of effects of the projects, as proposed (e.g. unmitigated, considering current water supply). Only after this analysis, should appropriate mitigation be considered. Both the mitigative effects and the adverse impacts of all proposed mitigation must be evaluated, in quantitative terms where appropriate.		4.1.3 through 4.5.3		61-56
	AIR QUALITY				
50.	Provide information regarding the effect on air quality of adding two new signals, as well as new access to Richardson Ave/Doyle Drive – consider immediate local effects as well as area-wide/regional effect.	139, 147, 157, 167	4.2.9, - 4.5.9,		61-57
	NOISE				
51.	Provide information regarding the effect on noise of adding two new signals, as well as new access to Richardson Ave/Doyle Drive – consider immediate local effects as well as area-wide/regional effect.	139, 148, 158, 168	4.2.10 - 4.5.10,		61-58
	PLANNING GUIDELINES				
52.	The Draft Planning Guidelines address a larger study area than the 23-acre project site described on the title page and elsewhere in the DEIS. The impacts of adoption of the Draft Planning Guidelines for the 60-acre site are not assessed in the DEIS. Adoption of the Guidelines would have impacts separate and apart from the proposal currently being considered. A separate alternative analysis and impact assessment for the Guidelines should be prepared prior to their consideration for adoption or use as a mitigation measure.		Chapter 4		61-59
53.	The analysis in the main body of the DEIS repeatedly states that all alternatives conform to "the GMPA's key restrictions on maximum allowable square footage for the [60-acre] complex" (DEIS p. 99). But the Draft Guidelines do not adopt this key restriction. The Guidelines should be amended to reflect the 1.3 million square foot restriction used as in the main body of the DEIS for the entire 60-acre planning area. If not so amended, the FEIS should not refer to project conformance with this key restriction in the GMPA and should address the effects of nonconformance.	99,129, 141,151, 161, 171	4.1.1.2. through 4.5.1.2. and Appendix B		61-60
54.	"Planning Guidelines for the site will direct all replacement construction." Planning Guidelines should be applied to the preferred alternative to produce a "Planning Guidelines preferred alternative" (PGPA). This PGPA would demonstrate the concepts of the "O'Reilly Commons" and preserve viewsheds while integrating the project with	7	1.3.7	¶ 3	61-61

NATIONAL PARK SERVICE
REVIEW COMMENTS
LETTERMAN COMPLEX – DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

NO.	COMMENT	PAGE	SECTION	PARA	
	the historic complex. The Guidelines state that "New Buildings which border the commons should present an inviting public face to this green space." The green space, roughly 85 feet wide, "is a significant and usable space" that makes a transition to the new development. The PGPA should incorporate, to the fullest extent, the environmental and design measures listed under the six heading topics of the Planning Guidelines.				61-61
55.	The Planning Guidelines are attached to the DEIS as an appendix in draft form implying that the Guidelines can be subject to further modification. The Guidelines are also presented as Mitigation CR-1 which "would ensure that any undertaking is in keeping with the character of the historic district." To be judged for effectiveness and feasibility of implementation, the Guidelines should be final rather than in flux. Describe how the planning guidelines, Measure CR-1, will be finalized and adopted as part of the EIS process.	37	2.6.6.		61-62
56.	Improve Guidelines by providing additional illustrations, such as north-south and east-west section cuts to show topography and building heights (both Presidio and city contexts), and photos showing views into and out of Letterman, including simulations of proposed development per the guidelines.		Appendix B		61-63
	GENERAL COMMENTS				
57.	The Title Page should describe the specific action(s) under consideration by the Presidio Trust that is the subject of this DEIS.	Title page		¶ 3	61-64
58.	Explain within the first paragraph that the Presidio Trust is a federal government corporation, established to manage the Presidio.	iii	Summary/ Introduction	¶ 1	61-65
	ALTERNATIVE 1				
59.	Provide information for the impacts of Alternative 1 actions only – information about and comparisons to actions under other alternatives should not be included in this analysis.	18 *ff.*	Throughout 4.1		61-66
	ALTERNATIVE 2				
60.	Building B is identified as "withdrawn" – provide use for building or delete from proposal.	22	Figure 6		61-67
61.	Additional Potential Adverse Effects to be assessed and mitigation with this alternative include: • Does not provide O'Reilly buffer zone • Proposal closes off Gorgas Ave/Lyon St connection • Views into site from the east are blocked • Gorgas edge is amorphous, not defined by strong (building) edge • Design has awkward circulation at new Gorgas Ave entries • There is minimal connection to the historic clusters (Thoreau Center, Thornburg/Edie)		4.2.8		61-68
	ALTERNATIVE 3				
62.	As the housing provided under this alternative is restricted to assisted living and nursing facilities, the jobs/housing balance envisioned under the GMPA would not be achieved.	142	4.3.1		61-69
63.	Additional Potential Adverse Effects to be assessed and mitigation with this alternative include: • Does not provide O'Reilly buffer zone • Scale of buildings along O'Reilly is too large, too solid • Plan has awkward circulation/connections at Lombard/Letterman and O'Reilly/Gorgas • Plan shows poor termination of Thornburg Ave; no connection between new and historic structures		4.3.8		61-70

NATIONAL PARK SERVICE
REVIEW COMMENTS
LETTERMAN COMPLEX – DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

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	• Gorgas edge is amorphous, not defined by strong (building) edge • There is minimal connection to the historic clusters (Thoreau Center, Thornburg/Edie)				61-70
	ALTERNATIVE 4				
64.	Additional Potential Adverse Effects to be assessed and mitigation with this alternative include: • Plan has awkward circulation/connections at Lombard/Letterman and O'Reilly/Gorgas • Plan shows poor termination of Thornburg Ave; no connection between new and historic structures • "Formal entry" (G) does not appear particularly formal, nor is it clearly a/the main entry • Scale of office buildings is large, too solid • North/south connections through the site are awkward, particular at the residences (from Lombard onto residential street) • There is minimal connection to the historic clusters (Thoreau Center, Thornburg/Edie)		4.4.8		61-71
	ALTERNATIVE 5				
65.	For alternative 5, the scale of new construction "would not be compatible with the adjacent structures". This impact should be further described as to distance, screening, changes to access, landscape, building heights, pedestrian experience, etc. The application of Mitigation Measure CL-1 (the Planning Guidelines) would "increase the size of the greensward ...to minimize the potential for an adverse effect." To indicate the effectiveness of CL-1, provide specific language describing the changes to the site plan. See also, Comments Nos. 52-56.	Chapter 4	4.5.8		61-72
66.	Additional Potential Adverse Effects to be assessed and mitigation with this alternative include: • Does not provide O'Reilly buffer zone • O'Reilly edge is impenetrable (single building, no paths to center of site). East/west views are entirely blocked. • Plan has awkward circulation/connection at O'Reilly/Gorgas • Character of the "great lawn" is inappropriate; seems more of a discrete urban park than integrated open space. • Gorgas edge is amorphous, not defined by strong (building) edge • There is no "public zone" at the south edge (Letterman/Lombard) • There is minimal connection to the historic clusters (Thoreau Center, Thornburg/Edie)		4.5.8.		61-73
67.	Conformance with *Planning Guidelines*, general questions: • Information needed showing topography, building heights – provide sections • Provide view simulations both into and out of site, including roofscape views (as from upper Lyon/Simonds Loop) • Information needed regarding final density across entire Letterman complex • Information needed regarding demolition and construction elsewhere in Letterman, Tennessee Hollow restoration		4.5.8.		61-74
	ILLUSTRATIONS, MAPS, FIGURES				
68.	There are now fewer than 870 buildings in the Presidio – provide the current total.	49	3.1	¶ 1	61-75

NATIONAL PARK SERVICE
REVIEW COMMENTS
LETTERMAN COMPLEX – DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

NO.	COMMENT	PAGE	SECTION	PARA	
69.	Provide a map that shows the secondary roads mentioned in the text including Thornburg, Edie, Torney and Girard.		Chapter 3		61-76
70.	Provide section analyses, showing current and proposed cross-sections through the site. Include information extending from the east side of Lyon St (neighbors) through the historic hospital complex (Thoreau Center) along the east-west axis, and from the Gorgas Ave warehouses up to Lombard St along the north-south axis.		Chapter 4		61-77
71.	Buildings 1029 and 1030, as well as several other structures, are shown in the site plan in a hatched line. Add this line type to the legend of all the figures. In Figure 4, Several buildings shown as "to be demolished" have already been demolished.	5-44	Figs. 3-10		61-78
72.	The definition of "infill" given in glossary should be expanded upon to include the meaning of the word in the context of historic preservation as used in sentence 4. New development that is infill in a historic district should attempt to reflect the footprint and dimensions of the historic district.	v	Summary	¶ 1	61-79

Responses to Comments in Letter 61

61-1

As is set out in master response 2A, the GMPA remains the guiding planning document for the portions of the Presidio under the Trust's jurisdiction. Therefore, the GMPA EIS continues to be applicable to future NEPA analysis, including this Letterman Complex Supplemental EIS. That being the case, certain of the commentor's assumptions reflect an unjustified concern. For further response to comments concerning the propriety of tiering the Letterman Complex EIS from the GMPA EIS, refer to master response 1D; and concerning the need to develop a comprehensive plan before going forward with the proposed project, refer to master response 4A.

61-2

First Paragraph – In response to this and other comments, the text at the end of each discussion of alternatives within Section 4, Environmental Consequences, of the Final EIS now includes an analysis of the cumulative effects of development projects on the National Historic Landmark (see master response 4B). The EIS preparers disagree with the commentors that the analysis should not tier from the GMPA EIS. Far from having set aside the planning assumptions for the Letterman Complex planning area, the GMPA remains the foundation and the comprehensive plan for all Presidio planning decisions, and the GMPA EIS still provides an adequate description of the broad effects of Presidio-wide future development. Therefore, the GMPA EIS remains applicable to future NEPA analysis, including the NEPA analysis in this Letterman Complex Supplemental EIS (see master response 1D). For further discussion of how the preferred concept for the site does not represent a substantial change from the GMPA, see master response 2A and Section 4.5.1.2 of the EIS.

Second Paragraph – The Presidio Trust fully intends to meet its obligations regarding Sections 106 and 110 of the NHPA. See master responses 1A, 1B and 1C. All adverse effects on historic properties of Alternatives 2 through 5 have been evaluated in Sections 4.2.8 through 4.5.8 (Cultural Resources) of the EIS. A copy of the Draft EIS was sent to the Advisory Council on April 19, 1999. Prior to the submittal of the document (June 10, 1999) and upon the recommendation of the Advisory Council, the Presidio Trust met with the Council and others to visit the 23-acre site and identify issues related to historic properties. The Council chose not to comment on the Draft EIS, but the Presidio Trust will continue to consult with the Council before the final decision is made and through implementation of the Letterman Complex Programmatic Agreement (see Appendix F of the Final EIS).

Third Paragraph – Refer to master response 7A.

Fourth Paragraph – In response to this and other comments, the text in Sections 4.2.8 through 4.5.8 have been revised to include additional analysis of the effects of the alternatives, as proposed, on cultural resources and their significance.

Fifth Paragraph – Refer to master response 7A.

Sixth Paragraph – The Presidio Trust has assumed responsibility for the preservation of the historic properties under its management in the Presidio and is complying with Section 110 of the NHPA in its actions with respect to these historic properties. The Trust has completed the rehabilitation of numerous historic and non-historic buildings elsewhere in the Presidio and has made rehabilitation of existing properties a priority. For the proposed project, no historic buildings are located in the 23 acres currently proposed for development. As is consistent with the mission of the Presidio Trust, new construction at this site is being pursued both in order to meet the statutory mission of economic self-sufficiency by the year 2013 (see master responses 10A and 10B) and to satisfy the GMPA plan which called for demolition of LAMC and new replacement construction.

61-3

A complete explanation of the Trust's process for identification of a preferred alternative is provided in Section 5.2, Preferred Alternative Selection Process, of the Final EIS where the Trust acknowledges the confusion caused by its press announcements. In the future, the Trust will make every effort to avoid similar confusion by more carefully drafting its press releases. For further response to the comment concerning the apparent pre-selection of an alternative, please refer to master response 6B. For response to comments concerning combining tenant selection and NEPA analysis into one process, refer to master responses 1D and 6A. For further discussion as to how the Trust has provided, rather than muddled, meaningful public participation, please refer to master response 1E and Section 5.1 of the Final EIS.

61-4

The Trust acknowledges NPS's suggestion about how to structure the NEPA assessment for its future Presidio projects. No commitments as to how to proceed with future NEPA assessments are needed for purposes of this EIS. For further discussion of the reasons supporting the Trust's alternative selection process and the adequacy of the range of alternatives, please refer to master response 6A. For further discussion as to how the Trust has provided meaningful public participation, please refer to master response 1E and Section 5.1 of the Final EIS. With regard to the request for modified site plans, and visual simulations and additional analysis of those plans, please refer to master response 24. Concerning public involvement in the design review process for revised site plans, see master response 7B.

61-5

The premise of this comment is incorrect. As discussed on the Cover Sheet, the Summary (page iii), and Section 1 (Purpose and Need) of the EIS, the project would focus development within the 23-acre site. It is consistent with NEPA to have focused the scope of the proposed project on the 23 acres. Furthermore, this Final EIS presents rational reasons for and thoroughly studied the effects of focusing the development within the 23-acre site. See master response 6A with regard to the 23-acre site within the 60-acre context. For purposes of comparing the magnitude of impacts of Alternatives 2 through 5, which would limit development to the 23 acres, the Science and Education Center (Alternative 1 in the EIS) contemplates and approximates an intensity of development on the 60 acres as is envisioned in the GMPA. Alternative 1 would allow for infill development within the larger 60-acre complex in areas that were not specifically defined in the GMPA EIS. Alternative 1 thus 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. Please refer to master responses 1D, 2A, and 6A for additional discussion of the 23-acre site.

There is absolutely no basis for the assertion that the Presidio Trust would not provide for the re-use and continued preservation of the historic structures within the 60-acre complex.

61-6

The Presidio Trust apologizes for any confusion that this list may have caused. The list was merely intended to provide a full environmental context for the discussion of impacts which focuses on the 23-acre site (see response to comment 61-5 above). In response to this comment, the list and Figure 4, Actions Common to All Alternatives, which appeared in the Draft EIS, have been deleted from the Final EIS.

61-7

The General Objectives of the GMPA have been identified by the Trust in Presidio Trust Board Resolution 99-11 and are provided in Section 1.1.5 of the EIS. The Final EIS clearly states that the General Objectives of the GMPA are not explicitly identified in the text of the GMPA and incorporates detailed discussion in the Summary, Section 1.1.5, and in master responses 3A and 3C explaining the Trust's process for ascertaining the General Objectives of the GMPA. Confusion, if any, between Resolution 99-11 and the "actual content of the GMPA" would not be avoided by the proposed modification, and has been adequately addressed through these added discussions.

61-8

Given the history behind Alternative 1, it would be inappropriate to reject this alternative. The specific user contemplated by the NPS is no longer available, but the alternative is still viable because it provides an analysis of what the GMPA anticipated would be the baseline or preferred use within the Letterman Complex. The Presidio Trust's preferred alternative perpetuates the GMPA baseline rather than proposing a drastic change from it. For clarity, the statement regarding its validity has been deleted from the Final EIS.

61-9

See response to comment 61-8 regarding Alternative 1. As required by NEPA, Alternative 6 warrants consideration because it serves as a benchmark to compare the magnitude of environmental impacts of Alternatives 1 through 5. For clarity, the statement on page xiii of the Draft EIS has been deleted from the Final EIS.

61-10

Such an explanation is not warranted, since in response to the comment, the list has been deleted. See response to comment 61-6.

61-11

See response to comment 61-6.

61-12

Please refer to master response 11 with regard to inclusion of square footage for structured parking. Since none of the alternatives propose reuse of the basements for habitable programs, the requested square footage

adjustments have not been added to the Final EIS. The total proposed construction square footages are included in each description of the alternatives in Section 2.

61-13

Table 9 provides sufficient information to allow a meaningful comparison of alternatives.

61-14

The total housing figures provided in the cumulative impacts analysis for each alternative (Sections 4.1.11.4 through 4.6.11.4–Housing) address this comment.

61-15

The comment concerning selection of a preferred alternative during the public review process is addressed in master response 6B. The comment concerning the adequacy of the range of alternatives considered is addressed in master response 6A. The comments concerning the need to include and analyze modified site plans and visual simulations are addressed in master responses 23 and 24. For comments concerning public involvement in the design review process for revised site plans, see master response 7B.

61-16

In response to this comment, additional text, provided in Sections 4.1.8.4, 4.2.8.6 through 4.5.8.6, and 4.6.8.4 (Visual Impact), has been added to provide visual impact analysis for each alternative. Graphics have also been added which present a comparative analysis of views for Alternatives 1 through 5 (Figures 20 through 24.) The standards used for identifying significant impact are provided at the beginning of Section 4.1.8. Concerning the need for photosimulations, please refer to master response 24.

61-17

The text has been revised to respond to the comment.

61-18 AND 61-19

Refer to master response 4B.

61-20

Refer to master response 11 for derivation of the proposed building area.

61-21

In response to the comment, the text of Section 1.2 of the EIS has been revised to include an explanation of the justification and need for the demolition of LAIR.

61-22

Refer to the Financial Management Program in Appendix E of the Final EIS, and master responses 10A and 10B.

61-23

In response to the comment, the text has been reworded for clarity.

61-24 AND 61-25

Refer to the response to comment 61-7.

61-26

Please refer to master response 23 with regard to the effects on the historic setting. In response to the comment, the text in Sections 4.1.8 through 4.5.8 has been revised to specifically describe the beneficial and adverse effects of each alternative on the historic setting. Text has also been added to further address the visual impacts of each alternative.

61-27

To respond to the commentor's concern, inconsistencies with the Planning Guidelines have been analyzed and any adverse effects have been identified in the Final EIS in Section 4, Environmental Consequences. Please refer to master response 7A with regard to the applicability of the Planning Guidelines.

61-28

According to CFR800.16(y), an undertaking is defined as "a project, activity or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; those acquiring a Federal permit, license or approval; and those subject to state or local regulation administered pursuant to a delegation or approval by a Federal agency." Section 4.1.8 of the Final EIS has been revised to reflect this new adopted definition of an undertaking.

61-29

Refer to master response 23.

61-30

The text of mitigation measure WQ-1, *Implementation of Best Management Practices*, has been revised to include oil and grease traps.

61-31

Restoration of Tennessee Hollow is a separate project subject to detailed planning and additional environmental analysis. The text change may confuse the reader and therefore has not been incorporated into the Final EIS. However, applicable portions of the recommended text have been incorporated into new mitigation measure SD-1, *Protection of Tennessee Hollow*, which would ensure that potential infill construction associated with Alternative 1 would not interfere with future restoration of the stream drainage. Alternatives 2 through 5 would have no effect on the stream drainage.

61-32

With the exception of water from Lobos Creek, these elements would not be affected under any alternatives currently being considered (see response to comments 61-6 and 61-31, and master response 4B). Therefore, the requested descriptions in the Affected Environment section of the EIS would be unnecessary. For a discussion of Lobos Creek water supply, please refer to Section 3.5.1 of the EIS.

61-33

The SWPPP would only protect water *quality* and would not reduce the quantity of storm water. In response to the comment, the statement has been deleted from the text of EIS.

61-34

The Presidio Trust is fully committed to supporting the restoration plan for the riparian corridor along the western edge of the 60-acre Letterman Complex. However, as mentioned by the commentor, the corridor is outside the boundary of the 23-acre site and would not be disturbed as a result of proposed development under Alternatives 2 through 5. Furthermore, new mitigation measure SD-1, *Protection of Tennessee Hollow* would ensure that any infill development associated with Alternative 1 within the remainder of the complex would not interfere with future restoration of the stream drainage. Therefore, incorporation of the riparian corridor into the landscaping plan, which would only apply to the 23-acre site under the preferred alternative, would be difficult to legally impose upon the proponent of that alternative should it be selected.

61-35

These maps have been amended as requested to show the corridor.

61-36

The text has been added as noted in the response to comment 61-31.

61-37

As discussed in Appendix D, page D-2, each alternative is assumed to use 265 of the existing Presidio housing units to meet the housing demand generated by the alternative. In addition to this portion of the existing housing, the new housing units, if any, proposed in each alternative are available to meet the housing demand. The following table summarizes the derivation of the housing available to each alternative that is used in Table 15.

ALTERNATIVE	PROPOSED NEW HOUSING UNITS	ALLOCATED SHARE OF EXISTING PRESIDIO HOUSING UNITS	TOTAL HOUSING UNITS AVAILABLE UNDER ALTERNATIVE
Alt. 1	0	265	265
Alt. 2	400	265	665
Alt. 3	0	265	265
Alt. 4	450	265	715
Alt. 5	0	265	265
Alt. 6	0	265	265

61-38

As shown in Exhibit 1 of the FMP in Appendix E of the Final EIS, in June 1998 there were 1,119 housing units and the proposed future condition includes 1,598 housing units at the Presidio. The increase in units is a result of the conversion of existing dormitory/barracks square footage to housing units. Subsequent to the preparation of the FMP, the Trust verified a count of 1,116 housing units, which would result in a future condition of 1,595 units. As of September 1999, 724 housing units were occupied and the Presidio Trust is in the process

of readying the remaining units for occupancy.

The EIS housing impact analysis included 188 dormitory housing units in its assessment of existing housing units. These are the units in buildings 1028, 1029, and 1030 which are either in current use for housing or under lease for re-use as housing. Thus, as discussed in Appendix D of the EIS, the existing housing units used as the basis for the housing impact assessment was 1,304. This value is less than the full 1,595 projected in the FMP as it only includes the currently committed portion of dormitory expansions. By conducting the housing analysis on committed projects only, the analysis is more conservative than it would be if more barracks/ dormitory conversions were included.

The housing impact analysis for each scenario assumed that 265 of the existing units were available to meet the housing demand created from the employment associated with each alternative (as discussed in Appendix D). If the housing impact analysis had been prepared using the proposed future conditions at the Presidio, with 1,595 housing units in the existing building stock plus the new housing proposed for each alternative, the impacts on the regional housing markets would be less for each alternative. By only including the housing stock currently available for housing use, rather than the expanded future housing condition, the Draft EIS is conservative in its assessment of the cumulative impacts of the additional housing demand generated by each alternative. Refer to response to comment 46-9.

61-39

Transportation and traffic impacts are assessed for each alternative and mitigation measures TR-1 through TR-3 have been developed to mitigate these impacts to a less than significant level. Refer to master response 19 for comments regarding TDM.

61-40

The reference to NEPA in the comment is not necessarily accurate. Under NEPA, actions may be analyzed either with or without mitigation (CEQ Regulations Sections 1502.14(f) and 1502.16 (h)). Refer to master response 18 for the description of the process required for Caltrans approval. Caltrans cannot give conceptual written approval until a Project Study Report has been prepared and city approval would not be meaningful without concurrent Caltrans approval.

61-41

These topics are addressed in the Transportation Technical Report (Wilbur Smith Associates 1999). Also, refer to the individual cumulative analysis traffic and transportation sections at the end of each discussion of alternatives in Section 4 of the Final EIS. The trip generation analysis in the EIS and Technical Report forecasts slightly fewer vehicle trips from the Letterman Complex than were forecast in the 1994 GMPA. Consequently, the traffic analysis in the 1994 GMPA EIS presents a valid and slightly conservative overview of Presidio-wide transportation impacts.

61-42

See master response 20 for neighborhood parking impacts. Regarding Area A, the preferred alternative has sufficient parking supply to accommodate demand onsite, and parking fees are not proposed. Consequently,

there would be no demand for parking in Area A from the tenant of the 23-acre site. In addition, the Trust will be working with the NPS to develop mutually agreeable restrictions on parking on Crissy Field (through either enforcement of time limits or other restrictions) that would effectively prevent Area B employee parking in Area A. The latter restrictions would be of increased significance for alternatives where parking fees on the 23-acre site are proposed.

61-43

The city owns the Richardson Avenue right-of-way east of the western boundary of Lyon Street and the Palace of Fine Arts property. The State (Caltrans) has been permitted the Richardson Avenue right-of-way (essentially the street width) west of that point. The federal government retains ownership of the remainder. A right-of-way map will be produced during the Project Study Report study and a copy will be forwarded to the NPS.

61-44

In response to the comment, refer to Figure 15 which shows direction of traffic flow at the reconfigured Gorgas Avenue/Richardson Avenue intersections. Also, Figures 4, 5, 6, 7, 8, and 9 have been revised to indicate entrance and exit points into the 23-acre site and principal internal traffic routes for each of the alternatives. No further information about direction of travel on the streets within each alternative can be provided or is warranted at this time.

61-45

Refer to master response 18.

61-46

See master response 18.

61-47

Girard Road currently provides access from the Main Post to the Thoreau Center parking lot and to dormitories and the new Swords to Plowshares program. It is proposed to retain this function in the GMPA and no changes are proposed as part of current planning for the Letterman Complex.

61-48

In response to the comment, locations of surface parking lots have been denoted on the site plans for each alternative. Street parking in anticipated under Alternatives 1, 2, and 4, but planning for these alternatives is too preliminary in nature to show exact locations. Figures 4 through 9 now indicate whether street parking is proposed.

61-49

This proportion was calculated by dividing the 23-acre site's 900,000 square feet by the Letterman Complex's 1.3 million square feet.

61-50

The Trust would work closely with the selected development team to ensure that TDM and mitigation measure TR-4, *Monitoring of Parking*, strategies are successful (see master response 19). Refer to master response 20 for parking controls.

61-51

Figure 11a has been revised to indicate the p.m. peak-hour roadway segment traffic volumes on Presidio Boulevard, Lombard Street within and outside the Presidio, Lincoln Boulevard, and Richardson Avenue.

61-52

See the response to comment 12-2. Analysis using the higher of the peak-hour traffic conditions is standard procedure in environmental analysis.

61-53

The EIS presents traffic volumes at the key intersections adjacent to and within the Presidio where traffic generated by development at the Letterman Complex would be most concentrated (see Figures D-1 through D-6 in Appendix D). Within the Letterman Complex, traffic would disperse through the internal roadway network, and traffic volumes on these roadways would vary by alternative depending on the roadway network and connections that would be provided, as well as the entrances/exits from the parking facility. The internal roadway network and connections would be refined and modified for the preferred alternative, as appropriate, as part of the design review process.

61-54

The intersections that were analyzed in the EIS were selected because they would be most likely affected by traffic generated by proposed development at the Letterman Complex. The roadways internal to the 23-acre site vary by alternative, and have not been designed to the level required for detailed traffic impact analysis (e.g., number of traffic lanes, turn pockets, intersection control). The design of the roadways and intersections internal to the 23-acre site would be developed with and reviewed by the Presidio Trust as part of the design review process to ensure adequate traffic circulation and acceptable traffic operating conditions.

61-53

The EIS presents traffic volumes at the key intersections adjacent to and within the Presidio where traffic generated by development at the Letterman Complex would be most concentrated (see Figures D-1 through D-6 in Appendix D). Within the Letterman Complex, traffic would disperse through the internal roadway network, and traffic volumes on these roadways would vary by alternative depending on the roadway network and connections that would be provided, as well as the entrances/exits from the parking facility. The internal roadway network and connections would be refined and modified for the preferred alternative, as appropriate, as part of the design review process.

61-54

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61-55

The land use associated with Letterman Digital Arts (Alternative 5) was considered to be "research and development" and the land use associated with the Internet media anchor tenant (Alternative 4) was considered to be "office use" because the proposed number of employees compared with the proposed square feet of replacement construction is consistent with the employee densities typically noted for those two use groups. The *Trip Generation Manual* (Institute 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.

61-56

The comment is inaccurate in its statement about NEPA. Mitigation may be built into an alternative (see response to comment 61-40). In further response to the comment, the text in Sections 4.1.3 through 4.5.3 (Water Supply and Distribution) and the water demand estimates in Tables 12 and 13 have been revised to evaluate the impacts of the alternatives on current water supply without mitigation (e.g., without the use of gray water or recycled storm water). The analysis concluded that only Alternative 2, with the highest water demand of 111,280 gallons per day, would require mitigation. Implementation of water conservation measures in mitigation measure WS-2, *Water Supply- and Demand-Side Solutions to Reduce Cumulative Impacts*, would save approximately 120,000 gpd of water, which would offset the increase in water demand due to development at the Letterman Complex. Regarding whether these measures would result in adverse impacts, see master response 13.

61-57

The air quality effects of adding new signals on Richardson Avenue/Doyle Drive at the Gorgas Avenue and Lyon Street connections would be beneficial, because the improvements would mitigate the p.m. peak-hour operation of the intersection under 2010 conditions from a rating of Level of Service (LOS) F without the improvements to LOS D, or better, depending on the proposed development alternative. The intersection operating conditions are discussed in Section 4.1.7.2, Impacts on Intersection Operating Conditions, and LOS ratings are shown on Table 18 of the EIS. These improvements would not cause a quantifiable effect on region-wide emissions because region-wide average travel speeds would not increase substantially. Localized CO concentrations, however, would be reduced because travel speeds through the intersection would be increased. Because intersection performance would improve, and the air quality effects would be beneficial, no further analysis is necessary.

61-58

Adding new signals on Richardson Avenue/Doyle Drive at the Gorgas Avenue and Lyon Street connections would not be expected to substantially alter the noise environment. The noise-sensitive residences near the existing intersection of Lyon Street and Francisco Street with Richardson Avenue would be most directly affected by these improvements. Existing conditions for this location are shown in Table 8 of the EIS. Average traffic speeds along Richardson Avenue near Francisco Street would increase with the intersection improve-

ments, and noise caused by vehicles accelerating through the intersection in its existing condition would be relocated about 200 feet from Richardson Avenue/Francisco Street to Richardson Avenue and the new Gorgas Avenue entrance. No substantial change in the character or intensity of the traffic noise is expected. Because no other noise-sensitive receptors would be likely to be affected by the intersection improvements, no further analysis is necessary.

61-59

Please refer to master response 7A. Implementation of the Planning Guidelines would have no impacts beyond those analyzed in the Draft EIS. Should any actions identified in the guidelines beyond the 23-acre site require major new development (such as infill construction associated with Alternative 1 or restoration of Tennessee Hollow), site-specific plans would be developed and additional environmental review and compliance with laws related to historic preservation would be conducted. Therefore, no additional analysis is required. As further discussed in Section 1.4.3 of the EIS, the NEPA process was an appropriate occasion to involve the public in the development of guidelines that would provide a framework for all actions in the 60-acre Letterman Complex.

61-60

The Planning Guidelines have not been amended as suggested. The Final EIS is the appropriate location for the description and analysis of the proposed square footage caps for the Letterman Complex, rather than the Planning Guidelines. The Planning Guidelines were prepared to guide the planning and design process for new construction within the Letterman Complex. They are a planning tool only.

61-61

A revised site plan for the preferred alternative has not been incorporated into the Final EIS. It is the Trust's opinion, as documented in the EIS, that the preferred alternative is largely consistent with the Planning Guidelines and those inconsistencies that constitute adverse effects are identified and adequately analyzed in Section 4 of the Final EIS. It should be noted that NEPA does not require the development of planning guidelines; rather, they offer an extra level of analysis and provide the public additional opportunities for involvement in the design process (see Section 1.4 of the Final EIS). For further discussion of the relationship of the Planning Guidelines to the project, please refer to master response 7A.

61-62

As with any mitigation measure presented in a Draft EIS, the Planning Guidelines presented there were in draft form, and the Trust included the draft guidelines with the Draft EIS to give the public opportunity for review and comment. The Planning Guidelines in Appendix B have been corrected and revised in response to public comments received and are now final. The Final Planning Guidelines in Appendix B will be merged into the Design Guidelines, which are now under development and must be submitted to the SHPO for review and comment as part of the NHPA's Section 106 consultation process. The Final Planning Guidelines would therefore be applied and continue to provide direction through the consultation and design review process under the Programmatic Agreement where there would be continuing review of their application by the ACHP, SHPO, NPS, and the public after the environmental review process for this action is concluded. This process

for applying the Planning Guidelines is incorporated into mitigation measure CR-1, which the Trust intends to adopt as part of its Record of Decision on this Final EIS.

61-63

Visual simulations of the various alternatives are not included in the Final EIS, as they are not required under NEPA. The use of appropriate graphics, while sometimes helpful, is not mandatory (CEQ NEPA Regulations Section 1502.8). In response to the comment, graphics to provide views of the 23-acre site (see Figure 13) and illustrate the visual impacts for each alternative have been added to the Final EIS (Figures 20 through 24), as well as more detailed analysis to address the concerns raised. The Planning Guidelines offer an extra level of analysis and offer the public additional opportunities for involvement in the design process. The Trust does not believe that the type of graphics described by the commentor is necessary within the guidelines. In addition, please refer to master response 24.

61-64

The title page of the Final EIS has been revised in response to this comment.

61-65

In response to this comment, the inside back page of the Final EIS provides additional information on the Presidio Trust.

61-66

Comment noted. References to and comparisons with other alternatives in the discussion under Section 4.1 have been omitted in the Final EIS. However, where the impacts of Alternatives 2 through 6 would be similar to Alternative 1 and do not raise additional issues (for example, cumulative impacts of Alternative 5 on schools as discussed in Section 4.5.11), the cross-references are still included in the Final EIS because they provide meaningful comparisons.

61-67

In response to the comment, building B has been deleted from the proposal. Please refer to Figure 5 in the Final EIS.

61-68

Additional text has been added to Section 4.2.8.1 to discuss any possible adverse effects of this alternative on building massing and scale, the O'Reilly Greensward, and site circulation. Also, Section 4.2.8.6 has been added to the Final EIS to discuss visual impacts of this alternative, including impacts on views and historic view corridors (also, please refer to Figure 21, Visual Impacts of Alternative 2 in the Final EIS).

- *O'Reilly Buffer* – Please refer to master response 23.
- *Gorgas/Lyon Connection* – Please refer to master response 22.
- *Views from East are Blocked* – Additional analysis of visual impacts, including views, has been added, as shown in Figure 21.
- *Gorgas Edge is Amorphous* – Please refer to master response 23. Also note that Figure B-18 in the Planning Guidelines has been changed to clarify the extent that a strong built edge is desired.

- *Design has Awkward Circulation at Gorgas Entries* – Please see master response 22.
- *Minimal Connections to Historic Clusters* – Additional text has been added to Chapter 4, Environmental Consequences to analyze connectivity and site circulation. Improving weak connections would be a subject of future design development and review.

61-69

Comment noted. No further response is necessary.

61-70

Additional text has been added to Section 4.3.8.1 to discuss any possible adverse effects of this alternative on building massing and scale, the O'Reilly Greensward, and site circulation. Also, Section 4.3.8.6 has been added to discuss visual impacts of this alternative which analyzes impacts on views and historic view corridors, as does the new Figure 22.

- *No O'Reilly Buffer* – Please refer to master response 23.
- *Scale of Buildings at O'Reilly too Large* – Please refer to master response 23.
- *Awkward Connection at Lombard/Lyon and O'Reilly/Gorgas* – Please refer to master response 22.
- *Poor Termination of Thornburg; No Connection between New and Historic Structures* – The Trust disagrees regarding termination at Thornburg Road. The historic view corridor would be preserved and additional circulation routes would be added. Refer to Figure 22, which has been added to the Final EIS.
- *Gorgas Edge is Amorphous* – Please refer to master response 23. Also note that Figure B-18 in the Planning Guidelines has been changed to clarify the extent that a strong built edge is desired.
- *Minimal Connection to Historic Clusters* – Additional text has been added to Section 4, Environmental Consequences, to analyze connectivity and site circulation. Improving weak connections would be a subject of future design development and review.

61-71

Additional text has been added to Section 4.4.8.1 to discuss any possible adverse effects of this alternative on building massing and scale, the O'Reilly Greensward, and site circulation. Also, Section 4.4.8.6 has been added to discuss visual impacts of this alternative, including impacts on views and historic view corridors (in addition, please refer to the new Figure 23).

- *Awkward Circulation/Connection at Lombard/Letterman and O'Reilly/Gorgas* – Please refer to master response 22.
- *Poor Termination of Thornburg; No Connection between New and Historic Structures* – Please refer to master response 22.
- *Formal Entry does not Appear Formal, not Clearly Main Entry* – The area in question is characterized by an open space adjacent to Letterman Drive defined by two parallel roads separated by a lawn which lead into the center of the complex. Adjacent buildings define two edges of this green space. At the conceptual level of this site plan, its degree of "formality" is highly subjective, but the Trust continues to feel comfortable in describing this as the main entry to the project.

- *Scale of Office Buildings too Large* – Please refer to master response 23.
- *North/South Connections are Awkward* – Please refer to master response 22.
- *Minimal Connection to Historic Clusters* – Additional text has been added to Section 4, Environmental Consequences, to analyze connectivity and site circulation. Improving weak connections would be a subject of future design development and review.

61-72

With regard to the comment about scale of new construction, please refer to the Final EIS, Section 4.5.8.1.

61-73

Additional text has been added to Section 4.5.8.1 to discuss any possible adverse effects of this alternative on building massing and scale, the O'Reilly Greensward, and site circulation. Also, Section 4.5.8.6 has been added to discuss visual impacts of this alternative, including impacts on views and historic view corridors (in addition, please refer to the new Figure 24.)

- *No O'Reilly Buffer* – Please refer to master response 23.
- *O'Reilly Edge and Views* – Please refer to master response 23.
- *Awkward Circulation/Connection at O'Reilly/Gorgas* – Please refer to master response 22.
- *Character of Great Lawn* – Please refer to responses to comments 25-4 and 33-2.
- *Gorgas Edge is Amorphous* – Please refer to master response 23. Also note that Figure B-18 in the Planning Guidelines has been changed to clarify the extent that a strong built edge is desired.
- *Public Zone* – Please refer to the response to comment 44-31.
- *Minimal Connection to Historic Clusters* – Additional text has been added to Section 4, Environmental Consequences, to analyze connectivity and site circulation. Improving weak connections would be a subject of future design development and review.
- *Information about Building Heights* – This information is contained in the description of the alternative. Topographic depiction would occur at a later stage in the planning and design development phases. That level of detailed information is beneath the required information for purposes of this NEPA analysis.
- *Simulations* – Please refer to master response 24.
- *Density* – Please refer to response to comments 4-1 and Final EIS Section 4.5.8.1.
- *Demolition/Construction* – The information is contained within the Final EIS in Section 2, Alternatives. With regard to specific concerns about Tennessee Hollow, please refer to responses to comments within letter 48.

61-75

Text has been added to Section 3, Affected Environment, and elsewhere, to include the total number of existing buildings.

61-76

These roads have been added to Figure 10, Existing Conditions.

61-77

This level of design detail is not required as part of NEPA but would be incorporated into the future planning and design review process to aid in assessing the consistency with the Planning Guidelines.

61-78

The maps have been modified to depict buildings 1029 and 1030, as well as other buildings not slated for demolition, with a solid line. Figure 4 has been corrected to delete those buildings which have already been demolished.

61-79

The recommended text change has been incorporated into the Final EIS.

Letter 62

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

PRESIDIO TRUST REC'D
JUN 2 2 '99

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

Dear Mr. Pelka:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Supplemental Environmental Impact Statement (DEIS) for the **Letterman Complex**. Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The Letterman Complex DEIS analyzes six alternatives for development and occupancy of a 23 acre site in the Presidio of San Francisco. In a notice dated June 18, 1999, the Presidio Trust identified Alternative 5, Digital Arts Center, as its preferred alternative. The Digital Arts Center alternative proposes to demolish the Letterman Army Medical Center and Letterman Army Institute of Research buildings, construct new buildings containing approximately 90,000 square feet of space, establish a digital arts archive and training institute, and devote a portion of the site to a landscaped open space with a water feature. 62-1

EPA has assigned a rating of **EC-2** (Environmental Concerns--Insufficient Information) to the Letterman Complex DEIS. This rating reflects our independent analysis of potential project impacts and the adequacy of the NEPA documentation prepared for the project, with a particular focus on the preferred alternative identified by the Presidio Trust. Please see the enclosed document entitled "Summary of EPA Rating Definitions" for a complete description of our rating categories.

EPA's principal concerns involve the traffic and parking aspects of the preferred alternative. We believe that the Presidio Trust should take all feasible steps to reduce the number of project-related single occupancy vehicle (SOV) trips to, from, and within the Presidio, and should adjust the capacity of the proposed parking structure accordingly. We are encouraged that the DEIS and the Transportation Technical Report include a Travel Demand Management (TDM) strategy, and recommend that the Record of Decision clearly state that continuing occupancy of the project site is dependent upon full participation in the TDM program. 62-2

EPA has also noted that the DEIS contains limited information regarding the Presidio Trust's long term development plans for the Presidio. Since the Presidio Trust intends to prepare separate NEPA documents for individual development actions, rather than a master development plan, we believe it would be appropriate for the Presidio Trust to give the public an opportunity 62-3

to comment on the overall development strategy in the context of cumulative environmental impacts. EPA was able to locate relevant information on this topic on the Presidio Trust's website, in a document entitled "The Presidio Trust Financial Management Program, Report to Congress" dated July 8, 1998, and we request that this document be included in the FEIS as an appendix. 62-3

EPA appreciates the opportunity to review this DEIS. If you have any questions about this letter, please contact Leonidas Payne of my staff at (415) 744-1571.

Sincerely,

David Farrel, Chief
Federal Activities Office

Atch: Summary of EPA Rating Definitions
Specific comments

SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

ADEQUACY OF THE IMPACT STATEMENT

Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

Specific Comments

1) Section 3.9.5 of the DEIS states that 1,465 off street and 88 on street parking spaces are available within the 60 acre Letterman Complex, but does not provide a specific figure for the 23 acre project site. This information should be provided in the FEIS. 62-4

2) The Presidio Trust should work to ensure that intersection and gate modifications do not pose a safety problem for bicyclists and pedestrians, through the elimination of sidewalk width, reduced signal times, or the necessity to wait through two traffic cycles to cross streets. 62-5

3) The Transportation Technical Report includes a table (Table 2.2 at Page 2-4) outlining the proposed TDM strategy components for Alternatives 2-5. We recommend that this table be updated to include Alternatives 1 and 6, and included in the FEIS. For the preferred alternative, we recommend that the FEIS include a brief summary of the overall TDM strategy concept for the alternative, and a more detailed explanation of the reasons for including or excluding specific TDM elements. To the degree that additional TDM elements might be instituted at a later time, we recommend that the FEIS discuss how, when, and under what circumstances additional TDM requirements would be imposed. 62-6

4) Section 4.5.7.3 states that "parking demand of 1260 spaces would be substantially less than the proposed supply of 1530 spaces, resulting in a surplus of 270 spaces" and that "[a] surplus in parking spaces could compromise the TDM strategies designed to encourage non-automobile modes, and could potentially result in an increase in vehicle trips to the site." To prevent these impacts, we recommend that the size of the proposed parking garage be adjusted accordingly. 62-7

5) The Presidio Trust should estimate the maximum number of SOV daily trips which could be eliminated with full implementation of all available TDM elements, and include this information in the FEIS. This evaluation should take place before the Presidio Trust makes a final decision on the capacity of the proposed parking garage. 62-8

6) EPA is particularly concerned about the expected number of vehicle trips within the Presidio, as outlined in Table 14. The Presidio Shuttle Bus System should be designed to accommodate these internal trips, rather than the proposed underground parking structure. 62-9

Responses to Comments in Letter 62

62-1

Thank you for your review. During scoping and the preparation stages of the Draft and Final EIS, the Presidio Trust requested the participation of the EPA. At the EPA's request, the Presidio Trust developed information to be included in the EIS, met with the agency, and extended the public comment period after consultation with the EPA. The Presidio Trust will continue to fully cooperate with the EPA during the remainder of the NEPA process for the Letterman Complex and take all feasible steps to reduce the environmental impact of the project.

62-2

Refer to master responses 19 and 20.

62-3

The cumulative impacts of currently foreseen development in the Presidio are described in Sections 4.1.11 through 4.6.11, Cumulative Impacts within the Final EIS. Please refer to master response 4A. In response to the comment, the FMP is included as Appendix E to the Final EIS.

62-4

The text of the Final EIS has been revised to indicate that there are currently 578 off-street parking spaces and 11 on-street parking spaces within the 23-acre site, which is 38 percent of the total parking supply in the 60-acre Letterman Complex.

62-5

The proposed traffic modifications do not include narrowing of sidewalks or reduced signal time for pedestrians.

62-6

In response to the comment, Table D-12 in Appendix D of the Final EIS has been revised to include summaries of the TDM strategies for Alternatives 1 and 6. In addition, please refer to master response 19.

62-7

See master response 20.

62-8

Refer to master response 19.

62-9

Comment noted. The Presidio Trust has set a maximum of 50 percent automobile use for internal trips, but believes that this can be improved through the internal bus shuttle and other TDM measures such as paid parking and improved bicycle routes and parking. The primary function of the shuttle bus system is to decrease dependency on the automobile for home/work trips for employees who live in the Presidio.

Letter 63

AMERICAN ASSOCIATION FOR THE ADVANCEMENT OF SCIENCE

Directorate for Education and Human Resources Programs

1200 New York Avenue, N.W.
Washington, DC 20005-3920
Tel: 202 326 6670
Fax: 202 371 9849

August 4, 1999

PRESIDIO TRUST REC'D

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

Dear Coordinator:

I am writing to speak to the requirements for development of the Letterman Digital Center in the Presidio National Park that call for enhancement of the cultural and educational resources of the Presidio. In particular I wish to speak to the role of the George Lucas Educational Foundation (GLEF), that will be housed within the Center. We have been pleased to be associated with the work of the Foundation as it represents cutting edge efforts to improve the quality of education by pointing the way toward real reform and developing a large, involved public constituency focused on helping the nation's schools. To me GLEF demonstrates Lucas companies' commitment to education.

This non – profit Foundation has created and distributed more than 27,000 copies of Learn and Live, a video and resource book that show what is possible in education when students are challenged and when new technologies are incorporated into their education. 63-1

The film was created to help policymakers, parents, educators, business leaders and the general public imagine how schools look when technology and other innovative strategies are employed in teaching and learning. The resource book was developed to guide those who wish to adapt and adopt such strategies to those people and places where ideas and advice are available.

There have been many different groups that have used the materials. We have been fortunate to be able to include presenters from GLEF at the AAAS Forum for School Science. Copies of Learn and Live are being shared with teacher leaders in the District of Columbia Public Schools and will help form the basis of local discussions on school reform. We are but one community where this resource is being made available.

Page 2
August 4, 1999

The stories in Learn and Live help us see a future for our schools that we are then inspired to create. The work of the George Lucas Educational Foundation is a reflection of the values and commitment of George Lucas to quality education for all children. I am excited about the plans for GLEF in the Presidio for it will position the Foundation to work with partner organizations in promoting a vision for school change. 63-1

Sincerely,

Shirley M. Malcom

Shirley M. Malcom, Head
Directorate for Education
and Human Resources

SMM/jw

Response to Comment in Letter 63

63-1

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

Letter 64

CALIFORNIA DEPARTMENT OF EDUCATION
721 Capitol Mall
Sacramento
CA 95814
Phone: (916) 657-4766
Fax: (916) 657-4973

DELAINE EASTIN
State Superintendent of Public Instruction

PRESIDIO TRUST REC'D
AUG 2 2 1999

August 5, 1999

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

Attn: Letterman Complex

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 prepared to live and work in a rapidly changing, highly technological world. 64-1

The Foundation produced *Learn & Live* to show parents, educators, policy makers, and the general public how technology and other innovations are being used to help create dynamic, effective public schools. The *Learn & Live* film and book are being used around the country by many different groups--in colleges of education with new teachers, by business leaders who are creating partnerships with schools, by school districts for inservice training, and by citizen groups to envision possibilities for the future. The stories and programs profiled in *Learn & Live* portray what education can be like when students, teachers, parents, businesses and communities focus on the educational issues at hand.

The work of The George Lucas Educational Foundation portrays George Lucas' commitment to quality public education. I know the Presidio National Park will be the perfect venue for them to continue their important work.

Sincerely,

Sonia Hernandez

Sonia Hernandez, Deputy Superintendent
Curriculum and Instructional Leadership

Take a step in the right direction. Support public schools by approving the George Lucas proposal. The nation's children will be the beneficiaries of your action!

Response to Comment in Letter 64

64-1

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

Letter 65

Golden Gate National Recreation Area and Point Reyes National Seashore

A D V I S O R Y C O M M I S S I O N

August 17, 1999

TO: Honorable Members of the Board
The Presidio Trust
San Francisco, California

REGARDING THE LETTERMAN DRAFT ENVIRONMENTAL IMPACT STATEMENT

At your request, and pursuant our statutory authority, this Commission held public hearings on June 15 and July 21, 1999 in San Francisco on your Draft Environmental Impact Statement (DEIS) for development of the Letterman complex. The public hearings have ended, and the public comment period is closed. Forwarded to you is the record of public comment as received by us, both at our hearings, and in written form. In addition, we submit the following comments for your consideration:

1. We choose in this letter to comment only on the EIS, and not to comment on the Trust's choice of a preferred alternative. 65-1

2. We encourage you to observe your commitment to follow the General Management Plan for the Presidio as your foundation planning document. We note your approach to do a Supplemental Environmental Impact Statement for instances in which the General Management Plan cannot be followed because of changed circumstances. 65-2

3. We are concerned that the General Management Plan Amendment for the Presidio is a broad, Presidio-wide planning document, and that the Environmental Impact Statement on it is relevant only when viewed in the context of the Presidio-wide plan it analyzed; as Presidio-wide planning assumptions get set aside, the GMPA EIS is no longer applicable, and we wonder if you can tier a subsequent EIS from it. 65-3

4. We agree with public comments that it seems to be time to update the General Management Plan for the Presidio. 65-4

5. We recommend your proposed Comprehensive Management Program be completed promptly, and be subject to public review. 65-5

6. In our view, your acceptance of a proposal for one site prior to completion of a comprehensive plan for the rest of the Presidio runs the risk of limiting options for uses elsewhere in the Presidio. As examples, a conference center in one place probably negates a conference center elsewhere; likewise, the absence of housing in one proposal increases the pressure for housing in future projects. The National Historic Preservation Act calls for comprehensive planning, and requires analysis of the cumulative effects of development projects on the National Historical Landmark as a whole. 65-6

Building 201, Fort Mason, San Francisco, CA 94123

Richard Bartke, *Chair* Amy Meyer, *Vice Chair* Michael Alexander Howard Cogswell, Ph.D. Jerry Friedman Naomi Gray
Redmond Kernan Melvin B. Lane Yvonne Lee Trent Orr Lennie Roberts Merritt Robinson R.H. "Hank" Sciaroni John J. Spring
Edgar Wayburn, M.D. Carlota del Portillo Jacqueline Young

Honorable Members of the Board
The Presidio Trust
August 17, 1999
Page 2

Re: Letterman Draft EIS

7. The design review process for your preferred alternative should be accomplished in the context of a specific implementation plan for the entire 60-acre Letterman site, not just the 23 acres in the Letterman offering. Design review should recognize the visual impression that new construction will have for visitors who are arriving in a national park. 65-7

8. Traffic remains a major concern to the park's constituents. Please continue to work with the National Park Service, city, state and neighborhoods, to mitigate the impacts of traffic on the park, and its neighbors. 65-8

9. We deem it a requirement that your tenants have an active and prominent public-serving component. In our view, this should be an adjunct to and done in cooperation with the museums of natural and cultural history on the Presidio. It should also include liberal opportunities for the public to visit and enjoy the amenities provided and to gain an understanding of the activities the tenants are engaged in and how they fit the mission of the Presidio as part of a national park. These components should be so situated that they are not only easily accessible by park visitors, but are within the natural circulation pattern, and attractive to visitors who may be unfamiliar with the Presidio. Likewise, the open space provided to your tenants should be so designed and sited that it will naturally attract our visitors. We urge that in your negotiations with potential tenants that all of the above be prime goals. 65-9

10. We suggest that before a lease is executed, that the lease or a summary of deal points, schematic designs, mitigation measures, and benefits to the park and the public, be presented for public dialogue at a public Trust workshop, or in an alternative public forum. 65-10

On behalf of the Commission,

Richard Bartke
Chairman
Golden Gate National Recreation Area
Citizens Advisory Commission

RHB;fs
ggnra\presidio.01

Responses to Comments in Letter 65

65-1

The Presidio Trust would like to thank the Advisory Commission for their comments on the EIS, and for holding public hearings on behalf of the Presidio Trust for new development at the Letterman Complex.

65-2

The comment is noted for the record. For further response on the Trust's compliance with the GMPA, refer to master response 2A.

65-3

Please refer to master response 1D.

65-4

See master responses 2B and 4A.

65-5

The comment is noted for the record. For further response concerning the need to complete the comprehensive management program, refer to master response 4A.

65-6

Please refer to Sections 1.1 and 1.2 of the Final EIS. For response to comment concerning the need for a comprehensive plan to adequately address cumulative effects under the NHPA, refer to master response 4A.

65-7

The Planning and Design Guidelines are the design framework for the entire 60-acre complex, with guidance for replacement construction within the 23-acre site. Please refer to master response 7B. The design review process will include an opportunity for public comment on the refined design and input about the visual impression that the new construction would have for visitors arriving at the Presidio. See also Section 1.4 of the Final EIS.

65-8

Comment noted. The Presidio Trust will continue to work with the cited agencies and others to mitigate traffic impacts.

65-9

Comment noted. Additional text has been added to the descriptions of the alternatives to better explain the proposed tenants' activities and programs, and community and support services. In addition to the programs and activities brought forward by tenants, the NPS, in cooperation with the Presidio Trust, is responsible for carrying out interpretive services for the Presidio and would be engaged in developing programs for the Letterman Complex. Text has also been added to the Final EIS to address the topic of visitor experience at the Letterman Complex (see master response 25). It is the Trust's intention that visitors be welcome within public areas and open spaces throughout the Letterman Complex and that circulation patterns be developed to allow visitors easy access into these areas.

65-10

Comment noted. Please see master response 7B with regard to the design review process and additional public involvement. The Presidio Trust will provide the public a project summary, information about mitigation measures, and benefits to the park and public as the project progresses.

Letter 66

STATE OF CALIFORNIA – THE RESOURCES AGENCY

GRAY DAVIS, *Governor*

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION
P.O. BOX 942896
SACRAMENTO, CA 94296-0001
(916) 653-6624 Fax: (916) 653-9824
calshpo@ohp.parks.ca.gov

September 27, 1999

Ms. Cherilyn Widell
Compliance and Permitting Manager
The Presidio Trust
34 Graham Street, P.O. Box 29052
SAN FRANCISCO CA 94129-0052

Re: DEIS and Planning Guidelines For The Letterman Complex

Dear ~~Ms. Widell~~: Cherilyn

Thank you for providing me with the opportunity to review and comment on the subject document.

To date, my comments on new development and uses within the Letterman Complex have been provided to the Presidio Trust as part of the ongoing Section 106 process for the undertaking. I intend to comment on the undertaking pursuant to the Section 106 process only. I will therefore not be commenting on the NEPA documents that the Trust has prepared. 66-1

I look forward to reviewing the next draft of the agreement document for the undertaking and to successful conclusion of our Section 106 consultation.

If you have any questions, please call Hans Kreutzberg, Chief of Project Review, at (9160 ^530-9107/e-mail hkreu@ohp.parks.ca.gov.

Sincerely,

Daniel Abeyta, Acting
State Historic Preservation Officer

Response to Comment in Letter 66

66-1

Thank you for your letter. The commentor's reference to Section 106 alludes to Section 106 of the National Historic Preservation Act. Under that legislative provision, federal agencies are required "to take into account the effect" of a project such as new development and uses within the Letterman Complex and to provide the Advisory Council on Historic Preservation (ACHP) a "reasonable opportunity to comment with regard to" such a project. The Council has issued regulations appearing at 36 FR Part 800 that detail how an agency such as the Presidio Trust may comply with the mandate of Section 106. Pursuant to these regulations, the Presidio Trust has been engaged in extensive consultation with the commentor's agency, the California State Historic Preservation Office and the ACHP regarding Section 106 compliance at the entire 60-acre Letterman Complex. The Presidio Trust has also received input and comment from a variety of other organizations. The result of this process has been the production of a Programmatic Agreement (as provided in Appendix F of the Final EIS) under Section 800.14 of the ACHP's regulations. The Programmatic Agreement envisions a sustained involvement of the State Historic Preservation Officer, the ACHP, and the NPS throughout the process of developing design guidelines, conceptual design documents, and schematic design documents. Also provided for in the Programmatic Agreement are significant roles for these entities in the construction monitoring and change order process. The Programmatic Agreement additionally contains, among other things, opportunity for public input; methodologies for addressing archeological properties, discoveries and unforeseen effects; and a requirement of mandatory notification to the Secretary of Interior and invitation for him to participate in consultation where there may be an adverse effect on historic properties. Implementation of the Programmatic Agreement will satisfy the Presidio Trust's Section 106 obligations.

Created by Congress in 1996, the Presidio Trust is charged with preserving the Presidio's natural, historic and scenic resources while making the park financially self-sufficient by 2013. Six Presidential appointees and the Secretary of the Interior or his designee sit on the Board of Directors and oversee management of 80 percent of the Presidio lands.

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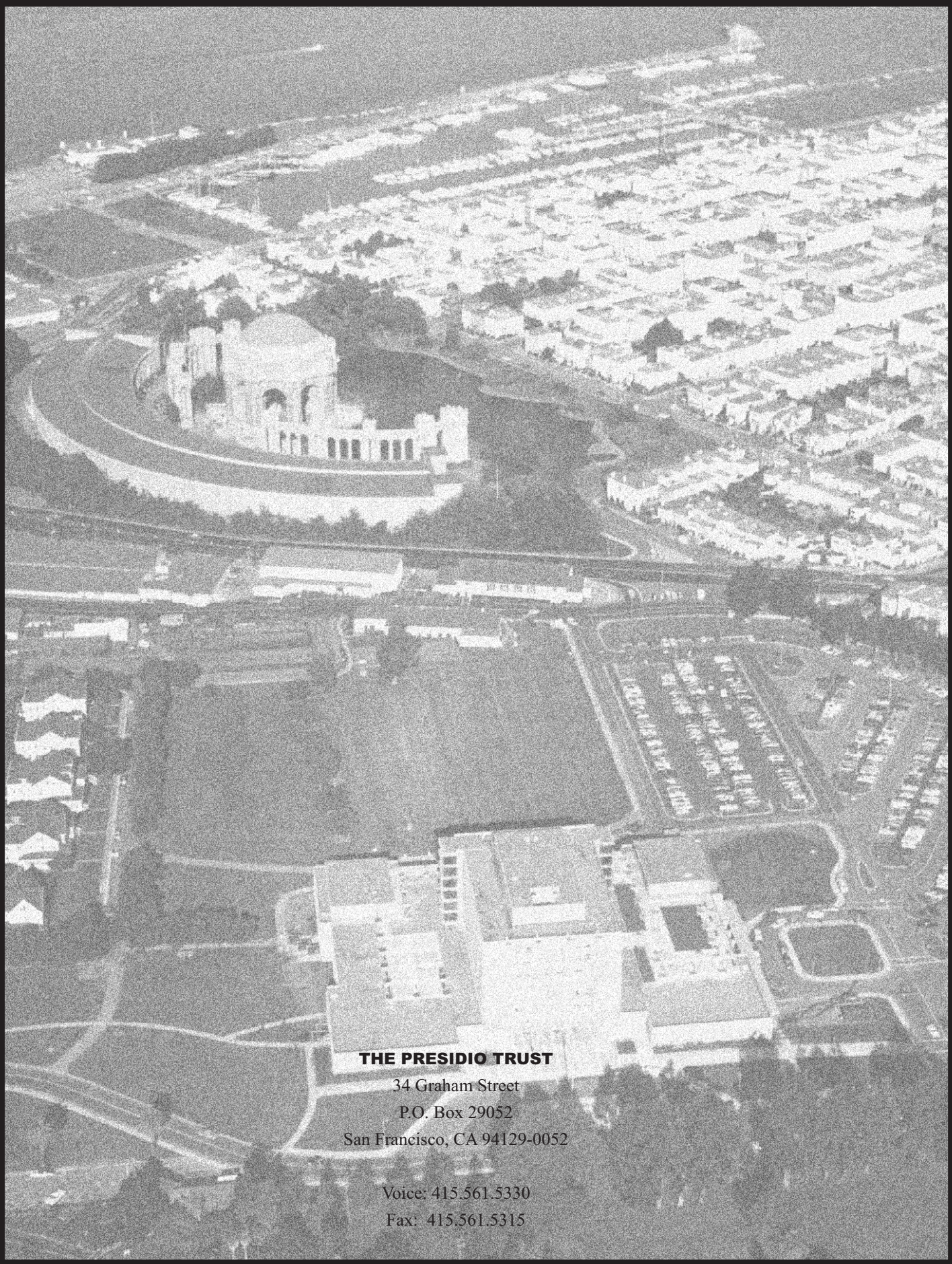

THE PRESIDIO TRUST
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