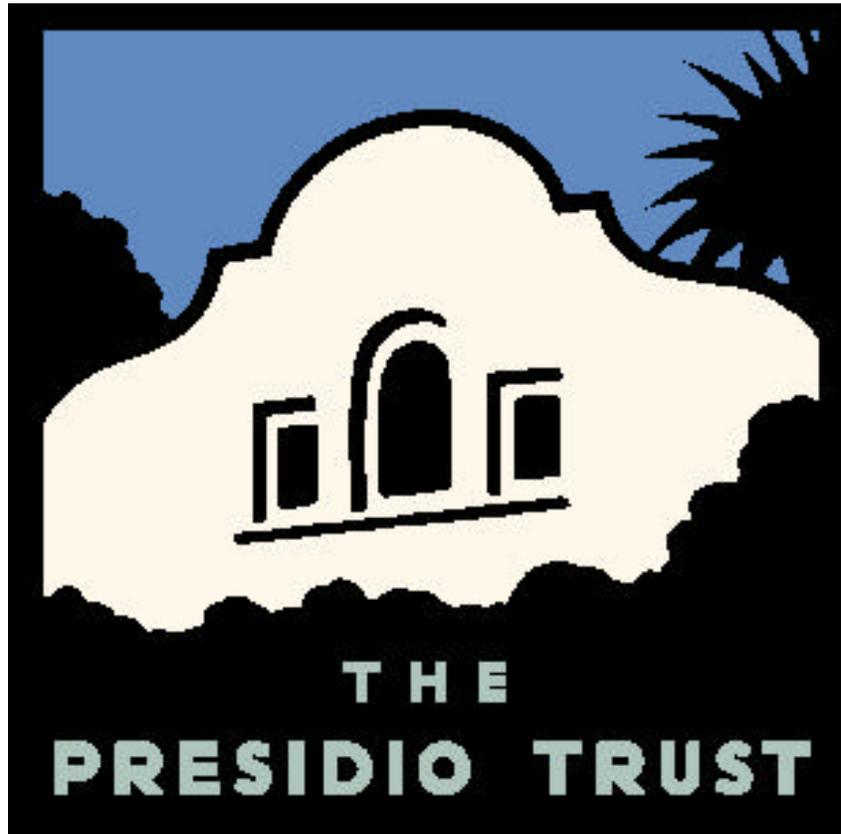


**R E C O R D   O F   D E C I S I O N**

**F I N A L   E N V I R O N M E N T A L  
I M P A C T   S T A T E M E N T   &  
P L A N N I N G   G U I D E L I N E S**



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A C R E S   W I T H I N**

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**T H E   L E T T E R M A N   C O M P L E X**

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**P R E S I D I O   O F   S A N   F R A N C I S C O  
M A Y   2 4 ,   2 0 0 0**



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*As part of the Golden Gate National Recreation Area, the Presidio's significant natural, historic, scenic, cultural and recreational resources must be managed in a manner which is consistent with sound principles of land use planning and management, and which protects the Presidio from development and uses which would destroy the scenic beauty and historic and natural character of the area and cultural and recreational resources.*

—From the Presidio Trust Act (P.L. 104-333)

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**T A B L E   O F   C O N T E N T S**

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The Presidio Trust (Trust) has prepared this Record of Decision (ROD) for the *Final Environmental Impact Statement and Planning Guidelines for New Development and Uses on 23 Acres within the Letterman Complex* (FEIS) at the Presidio of San Francisco. The FEIS is a supplement to the *Final General Management Plan Amendment Environmental Impact Statement for the Presidio*. The Presidio Trust (Trust) developed the ROD in compliance with agency decision-making requirements under the National Environmental Policy Act of 1969 (NEPA) as amended (42 U.S.C. §§ 4321 et seq.), and NEPA's implementing regulations promulgated by the Council on Environmental Quality (CEQ) (40 C.F.R. 1500 et seq.).

The ROD documents the decision and rationale for selecting a proposed development alternative for the 23-acre site in compliance with the mandates of the Presidio Trust Act (Trust Act) and as guided by the 1994 General Management Plan Amendment (GMPA). The document is a statement of the decision, alternatives considered, the nature of public involvement, and mitigating measures developed to avoid or minimize environmental impacts. Based upon public comments received on the April 1999 *Draft Environmental Impact Statement and Planning Guidelines for New Development and Uses on 23 Acres within the Letterman Complex* (DEIS), the Trust made appropriate changes to the text and in March 2000 released the FEIS. The Trust received comments on the DEIS from 163 agencies, private organizations, and private citizens.<sup>1</sup> The Trust's responses to the comments can be found in the second volume of the FEIS. Additional comments have been received on the FEIS, and responses, as appropriate, are part of and attached to this ROD.

## ***1 Background***

*The Unique Presidio Site* – The 1,480-acre Presidio of San Francisco is one of the country's great natural and historic sites. It possesses an extraordinary combination of natural beauty, ecological diversity and historical significance. A military garrison for nearly 220 years under three different flags, the Presidio is a National Historic Landmark within the Golden Gate National Recreation Area (GGNRA), an extensive national park that begins where the Pacific Ocean meets the San Francisco Bay. The Presidio is unique within the national park system. Its natural and historic setting is integrated into 700 developed acres with more than 780 buildings and approximately 6.0 million square feet of building space. Of the total, approximately 500 of the Presidio's buildings have historic and cultural significance. Its offices, warehouses, residential areas, more than 1,100 housing units, roads system, utility infrastructure, retail stores, tennis courts, bowling center, theater, swimming pool, golf course, gymnasiums and other facilities are within a park boundary that itself is located within an amalgam of heavily urban and suburban communities. The Presidio's characteristics make it an exceptional place for people to live, learn, work, and play.

*From Military Post to National Park* – The Presidio's transition from military post to national park began in 1972, when, in the legislation creating the GGNRA (Public Law 92-589), Congress included a provision that the Presidio would become part of the GGNRA if the military ever declared the base excess to its needs. The Presidio was designated for closure in 1989; the Presidio's long-time occupant, the U.S. Army, transferred the jurisdiction over the Presidio to the National Park Service (NPS) in 1994. As part of the transition, the NPS in

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<sup>1</sup> This includes a single organization's electronic form letter that was sent by 100 individuals.



July 1994 completed and issued a final General Management Plan Amendment (GMPA) for the Presidio laying out a vision for its future use and management. While NPS's GMPA set out general land use plans for 13 distinct Presidio planning areas involving a varied mix of preservation, rehabilitation, demolition, and new construction, the GMPA contemplated that more detailed site-specific plans and designs with supplemental environmental analysis would be prepared during its implementation.

*Innovative Approaches and Authorities for the Presidio* – Once the plan was created, difficult issues remained of how to fund the implementation of the plan. NPS recognized that implementing the GMPA would require innovative approaches and unique authorities to manage those aspects of the GMPA outside of NPS's expertise, such as leasing, repair, property management, and fund-raising. As Congress debated the creation of a new managing entity, estimates of costs to implement the GMPA showed the Presidio to be by far the most expensive park managed by NPS. NPS estimated annual costs at \$40 million and capital improvement cost estimates ranged from \$490 million to \$741 million. By way of contrast, the annual cost of maintaining Yellowstone, the next most expensive park in the national park system, is \$20 million. In view of these projections, Congress was unwilling to commit the extent of federal monies needed over the long-term to improve, protect, and maintain the Presidio, but was willing to create an innovative entity that would be charged with achieving these goals.

*Creation of the Presidio Trust and Its Unique Mandate* – In 1996, Congress established the Presidio Trust (Trust) pursuant to the Presidio Trust Act (16 U.S.C. 460bb appendix) (Trust Act). In response to competing public policy goals, Congress gave the Trust the unique responsibility to reduce and eventually eliminate the costs of the Presidio to the federal government while retaining the Presidio within the GGNRA. To achieve these goals, Congress provided only a limited budget, which would incrementally decrease to zero over 15 years, and provided no appropriated funds targeted for needed capital expenditures to preserve the park resources. Although it did not provide full funding, Congress granted the Trust a unique set of authorities to accomplish the Trust Act's goals. The Trust has authority to generate and retain revenue and to borrow money from the U.S. Treasury to finance repair and rehabilitation of the Presidio's historic structures, and flexibility in operating procedures to secure Presidio tenants in an ever-changing environment.

The Presidio Trust is a wholly-owned federal government corporation whose purposes are to preserve and enhance the Presidio as a national park, to ensure that the Presidio becomes financially self-sufficient by 2013 (i.e., generate sufficient revenue without any federal appropriation to fund long-term operating and maintenance costs and to fund capital reserves for ongoing capital expenditure needs). The Trust assumed administrative jurisdiction over 80 percent of the Presidio on July 1, 1998, and NPS retains jurisdiction of the coastal areas. The Trust is managed by a seven-person Board of Directors, on which a Department of Interior representative serves. The Trust brings to the Presidio diverse experience, including real estate leasing, finance, development and property management, and will apply this expertise to lease more than 3 million square feet of new and historic building space and more than 1,100 housing units in the Presidio. NPS, in cooperation with the Trust, provides visitor services and interpretive and educational programs throughout the Presidio.

*The GMPA as Master Planning Document* – In carrying out the mandates of the Trust Act, the GMPA, finalized by NPS in 1994, is the foundational plan that guides the Trust's planning and decision making. Its importance



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is reinforced by both the Trust Act and Trust policy. The Trust Act directs the Presidio Trust to manage the property under its administrative jurisdiction in accordance with both the purposes of the Act establishing the GGNRA and in accord with the “general objectives” of the GMPA. While the general objectives set forth in Presidio Trust Board Resolution 99-11 dated March 4, 1999 (General Objectives) are the Act’s required guideposts, the Trust continues to use the GMPA as the master document to guide its decision making, despite the fact that changed conditions at times require the Trust to reassess certain of the GMPA’s site-specific plans and programs. In sum, as a matter of law, the Presidio Trust follows the General Objectives of the GMPA, and as a matter of policy, the Trust uses the GMPA as its principal guide for all planning activities.

*The Presidio’s Letterman Complex* – The Letterman Complex, located in the northeast portion of the Presidio, is in close proximity to the Marina District of the city of San Francisco outside the Lombard Street Gate. It is, and historically has been, one of the most urbanized locations within the Presidio. Intensive use of the site began in 1898 with the construction of the original Letterman Hospital, which established this area of the Presidio as a link to the adjacent city. By 1915, the 23-acre site became home to a portion of the Panama Pacific International Exposition, and after World War I it was the site of the East Letterman Hospital expansion. Between 1965 and 1976, as the military planned for a more modern hospital site, the East Hospital at the 23-acre site was removed to make way for two new and more modern structures, the 451,000-square-foot Letterman Army Medical Center (LAMC) and the 356,000-square-foot Letterman Army Institute of Research (LAIR).

Consistent with the intensity of historic use, the Letterman Complex was designated under the Presidio GMPA as one of the “building and activity cores” where building demolition and replacement construction would occur. The complex contains approximately 1.3 million square feet in about 50 buildings. The bulk of that space is contained in a 23-acre site that includes the non-historic, functionally obsolete LAMC and the non-historic LAIR, which dominate the area. An additional 158,000 square feet of space are included in the Thoreau Center for Sustainability, which exists within buildings recently rehabilitated in the historic hospital complex. The Letterman Complex also contains surface parking lots, landscaped areas and approximately two miles of roadways.

*The Letterman Complex/Lead Project and Economic Engine* – Before Congress could create the new federal entity (now the Presidio Trust) and with the Presidio buildings and infrastructure in critical need of rehabilitation and repair, Congress enacted special legislation giving NPS interim leasing authority for the Letterman Complex to begin implementing the GMPA. Recognizing the Letterman Complex as having the greatest revenue-generation potential for the Presidio, NPS chose to pursue leasing of Letterman facilities in order to generate sufficient revenues early in the GMPA’s implementation to address the critically deteriorating condition of other Presidio facilities. In 1994, therefore, NPS solicited potential tenants for the Letterman Complex, and entered into lease negotiations with the University of California at San Francisco (UCSF) to occupy the two largest facilities on the site: the hospital and research center. Although NPS ultimately leased a small portion of the buildings at other parts of the complex, the negotiations with UCSF (and others) subsequently failed, and what to do with the still vacant hospital and research center facilities on the 23 acres at the southeast portion of the site became one of the Trust’s early responsibilities following its creation in 1996.



The Trust has now turned its efforts to the unfinished Letterman Complex implementation. Under the Presidio Trust Act, the Presidio Trust is considered the successor-in-interest to the NPS for purposes of compliance with NEPA. Thus, to the extent that the Trust seeks to implement proposals that previously have been adequately analyzed under the GMPA EIS, the Trust may rely upon that earlier analysis. Where the Trust's proposals depart from the plans previously analyzed under NEPA, however, the Trust undertakes further environmental review consistent with the requirements of NEPA, the National Historic Preservation Act (NHPA), and other relevant environmental review laws and executive orders.

The proposed Letterman project is needed to achieve the varied mandates of the Trust Act. The Trust was considering the new Trust Act mandates when it returned to the implementation of the planning process that the NPS had started several years earlier for the Letterman Complex. The proposed project is intended to serve as an economic engine, generating early and significant revenue to pay for capital improvements and historic building rehabilitation that, in turn, will allow revenue generation at other areas of the Presidio.

To ensure sufficient revenue generation from the Letterman project to meet the self-sufficiency projections as set forth in the Financial Management Program (FMP) required by Congress, the Trust proposed an offer of development of 900,000 square feet within a 23-acre site at the Letterman Complex.<sup>2</sup> This proposal fairly approximates the density of development currently existing on the 23-acre site, and was largely consistent with the GMPA's leasing and financing implementation strategy for the Letterman Complex.

## **2   *Decision***

Based upon a thorough analysis of the alternatives and their potential environmental consequences, consideration of all public and agency comments received during the NEPA process, and in consideration of the mandates of the Presidio Trust Act together with the plan set out in the GMPA, the Trust has determined to adopt and implement Alternative 5 of the FEIS as the development alternative for the 23-acre site at the Letterman Complex. Features of Alternative 5 are fully described in Section 4.5 of the FEIS.

## **3   *Alternatives Considered***

In response to the unique financial, planning, and tenant selection mandates of the Trust Act (see FEIS Section 1.2.1), of key importance to the Trust's process was to identify alternatives based upon proposals that the marketplace could actually offer. Building the process of alternative identification around this criterion was intended to avoid the result of having studied and selected a prospective use for a particular site for which no tenant could ultimately be found, as was the case when UCSF and others failed to lease the Letterman facilities following the GMPA EIS (see FEIS Sections 1.1.7 and 1.2.2). Therefore, the Trust, through a Request for Qualifications (RFQ) and later Request for Proposals (RFP) for the Letterman Complex, solicited market-based

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<sup>2</sup> The "Letterman Complex" is identified in the GMPA as a 60-acre geographic area in the northeast corner of the Presidio consisting of approximately 50 buildings, both historic and modern. This proposal is for redevelopment on 23 of those 60 acres, and involves only non-historic structures.



proposals seeking submitters capable of ground leasing and developing 900,000 square feet of new replacement construction on a 23-acre site within the Letterman Complex. A project of 900,000 square feet was necessary to achieve the financial expectations of the FMP, and the 23-acre site approximated the density that already existed and was proposed as a possibility by NPS's Letterman RFQ at this developed site (see FEIS Section 1.2.2).

A summary of the six alternatives is provided in Table 1 of the FEIS. Alternative 6, Minimum Management, has been included in the analysis to evaluate the impacts of a "no action" alternative as required by NEPA. Similarly, the Trust has included Alternative 1, the Science and Education Center, to provide a useful baseline study of the impacts of implementing the GMPA alternative, as updated by current circumstances. Alternatives 2, 3, 4, and 5 present a range of real-world alternatives based upon proposals submitted in response to the Trust's 1998 RFQ.

### **3.1 Alternative 1: Science and Education Center (Updated GMPA Alternative)**

This alternative would dedicate the entire 60-acre Letterman Complex to scientific research and education focusing on issues of human health, including preventive medicine, nutrition, collaborative eastern/western medicine and health concerns related to the environment. Public participation, information and education about ongoing activities would be an important component of all research programs. The LAIR would be rehabilitated and leased for reuse as a research/office facility. The LAMC could be rehabilitated or partly or entirely removed. Up to 503,000 gross square feet of replacement construction, including infill construction outside the 23-acre site and within the adjacent historic hospital complex, could substitute for LAMC and other buildings identified for demolition. New construction would occur if existing buildings and improvements could not meet essential program and management needs.<sup>3</sup>

### **3.2 Alternative 2: Sustainable Urban Village**

This alternative would create a sustainable village campus on the 23 acres for health care, education, office, and residential uses, and an inn, organized around a central "commons." Both the LAMC and LAIR buildings would be removed and replaced with up to 900,000 gross square feet of new construction to be located only on the 23-acre site. Institutional facilities would focus on issues related to seniors' health. Educational facilities would include a culinary institute and a professional graduate institution for eastern medicine. For-profit, high-tech companies and non-profit organizations would occupy office space. Housing would be leased to students enrolled at the educational facilities, other persons working in the Letterman Complex, and the general public. The inn would provide lodging for Presidio visitors, as well as a conference and retreat facility for adjacent institutional and health research tenants. Urban agriculture, aquaculture, and a marketplace for selling produce grown on the 23-acre site would be integrated into the open space.

### **3.3 Alternative 3: Mixed-Use Development**

This alternative would be a mixed-use development on the 23 acres that includes a conference center with lodging, a senior living center, a culinary institute, and office space for non-profit and for-profit organizations.

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<sup>3</sup> No applicant has come forward to back such an alternative, despite the Trust's, and previously NPS's, efforts to identify and interest such an applicant.



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## RECORD OF DECISION

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The conference facility would serve as a national and international learning and education center, providing a wide range of activities that include training programs available to the Presidio community. A 350-room lodge would support the conference center and be available for Presidio visitors and tenant needs. The senior living facility would consist of assisted living accommodations and nursing care. Onsite services would provide convenience shopping, food, and other services to Presidio visitors and residents. This alternative would require the removal of the LAMC and LAIR buildings, which would be replaced with up to 900,000 gross square feet of new construction on the 23-acre site.

### **3.4 Alternative 4: Live/Work Village**

This alternative would be a mixed-use village of offices, institutions, housing, and support services on the 23-acre site. The village would include an anchor tenant devoted to Internet media, communications and education, complemented by a variety of smaller organizations with a mix of for-profit and non-profit groups. Presidio village tenants would focus on conservation, cultural and park issues. The buildings would be clustered around a central “green.” Housing would be a key component of this alternative to enhance the village-like setting and encourage a live/work community. The village green would serve as a gathering place for informal and planned public activities. The LAMC and LAIR buildings would be removed and replaced by 900,000 gross square feet of new construction to be located only on the 23-acre site.

### **3.5 Alternative 5: Digital Arts Center (Preferred Alternative)**

This alternative would serve as a 23-acre office campus occupied primarily by a single institutional user engaged in research, development and production of digital arts and technologies related to the entertainment industry. Programs would include a visual effects and digital animation company; an interactive entertainment provider; and an educational software provider; a movie screen and home-theater visual and sound technology provider; a developer of websites and content provider related to the parent company; and a non-profit educational foundation. A visual effects archive would be established which would make materials available to industry researchers, historians, scholars, academicians and other individuals interested in studying the evolution of visual effects. A museum of visual arts and technology that would be open to the general public might also be included as an alternative to the archive facility. A digital arts training institute would also be established that would offer tuition-free intensive training in the field of digital arts to candidates of advanced study in computer graphics. Educational opportunities would be offered to others as well. A 7-acre park or “great lawn” with a water feature would be a significant site feature for park visitors and the center’s employees. The LAMC and LAIR buildings would be demolished and replaced by 900,000 gross square feet of new construction on the 23-acre site.

### **3.6 Alternative 6: No Action**

This alternative would call for the Presidio Trust’s management of the 23-acre site in accordance with 1) the purposes set forth in Section 1 of the Act that established the GGNRA and 2) the General Objectives of the Presidio GMPA. Programs would be designed to reduce expenditures by the Trust and increase revenues to the federal government to the maximum extent possible, subject to applicable environmental compliance statutes. Tenants would be encouraged, but not required, to provide public programs related to the park’s purpose. LAMC would be “mothballed”; LAIR would be permitted/leased for office and research use without major rehabilitation. This building would be brought into compliance with federal building codes and regulations



appropriate to use and occupancy to the extent practicable. Demolition of other buildings would occur if they are identified in the GMPA for demolition and could not be cost-effectively rehabilitated. New construction, if any, would replace existing structures with others of similar size. Limited site improvements and cultural landscape rehabilitation would be carried out.

#### ***4 Identification of the Environmentally Preferred Alternative***

CEQ regulations require that an agency identify its environmentally preferred alternative or alternatives (40 C.F.R. § 1505.2(b)). Identification of the environmentally preferred alternative(s) need not coincide with the alternative selected for implementation because the decision to select a particular alternative for implementation may involve other factors than environmental quality. After considering impacts to each resource topic by alternative, the Trust has determined that both Alternative 1 (Science and Education Center) and Alternative 2 (Sustainable Urban Village) are environmentally preferred alternatives.

Each of the six alternatives considered involves some environmental impacts that are significant, unavoidable, and adverse.<sup>4</sup> Under these circumstances, the identification of the environmentally preferred alternative requires a complex balancing of one environmental impact against other differing environmental effects. Here, each alternative has an unavoidable adverse effect on the cultural resources of the Presidio and on short-term noise impacts. Alternative 2 is the only alternative limited to these two impacts, and for that reason it is the alternative with the least unavoidable adverse environmental effects. On numbers of effects alone, therefore, the Trust has identified Alternative 2 as an environmentally preferred alternative.

An analysis based purely on numbers of effects may be informative, but it is not the only method to evaluate what may be environmentally preferable under these circumstances. Another means of evaluation is to emphasize the value of certain environmental factors over others. Here, where the Presidio was preserved as a park in part because of the importance of preserving its cultural and historic resources, it is possible to weight the potential impact on the cultural resources more heavily than other environmental effects. Alternative 1 arguably has the most significant unavoidable adverse environmental effects because it involves unmitigated effects on the cultural and visual resource due to the retention of LAIR, and on long-term air quality and short-term noise impacts. Alternative 1, however, also has a potentially offsetting beneficial effect on the cultural resource through the removal of LAMC and replacement as infill construction elsewhere within the 60-acre complex. By allowing for new infill buildings to be constructed around the adjacent historic hospital, Alternative 1, although it has a number of other adverse and unavoidable environmental effects, has the potential to restore the historic pattern of development and would therefore have a potentially beneficial effect on the historic setting within the Letterman Complex.

Because Alternative 1 is the only alternative that would provide for compatible infill construction outside the 23 acres to reinforce the historic pattern of development, it has been identified as the alternative that has the

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<sup>4</sup> All six alternatives have an unavoidable adverse effect on cultural resources and on short-term noise. Alternatives 3 and 5 have an unavoidable adverse effect on housing. Alternatives 1 and 6 have unavoidable adverse effects on visual resources, and Alternatives 1 and 4 have unavoidable effects on air quality.



potential to best protect and enhance cultural resources within the complex. While environmentally preferable for this reason, Alternative 1 is not consistent with the financial mandates of the Trust Act because there is no market proposal to implement this alternative. Despite the earlier NPS efforts and the more recent ones of the Trust to identify and interest a potential medical research tenant, none have emerged.

## ***5 Reasons for the Decision***

The Trust has selected the alternative that, in its judgment, best fulfills the purpose and need outlined in Section 1 of the FEIS, including the specific goals for the project (see FEIS Section 1.3). The project's purpose and need reflect two overarching objectives: to fulfill the mission of the Presidio as a park while at the same time supporting the Presidio's financial self-sufficiency. The decision to select Alternative 5 for implementation is based upon having considered all of the following factors independently and selecting the alternative that collectively best satisfies all of the various concerns.

### **5.1 Consistency with General Objectives and Contribution to GMPA Programs**

In comparison to the other alternatives, Alternative 5 provides a development proposal that best serves Presidio themes with its focus on fostering creative arts and education, research and innovation, scientific discovery, community service, and public outreach. Consistent with both the GMPA and its General Objectives as determined by the Trust, Alternative 5 enhances the scenic resources of the Presidio by removal of both the LAMC and LAIR buildings, modern structures that block view corridors and are architecturally non-distinctive and clash with their surroundings. Furthermore, of all the action alternatives, Alternative 5 is most consistent with and fairly approximates the development envisioned in the GMPA, because it retains the site for science and research purposes primarily by a single institutional user or collaborative group of users devoted to innovative research and development. Alternative 5 also fairly approximates the GMPA in its public access aspects, the extent of open space (actually increasing unpaved open space), in its enhancement of visitor services and amenities, and in the absence of a housing component. Furthermore, of all the proponent-supported alternatives, Alternative 5 provides strong support for park interpretive programs using its own innovative technology and techniques to enhance the national park visitor experience.

### **5.2 Revenue Generation and Financial Capability**

Alternative 5 is on par with Alternatives 2 through 4 in terms of revenue generation and financing capability. The proponents of Alternative 5 are fully capable of meeting the revenue generation requirements established by the FMP, and will provide their own internal financing for the project. Furthermore, in a more speculative project, as in Alternatives 2, 3, and 4, the developer must often secure tenants before financing can be assured, creating an element of initial uncertainty for the Trust regarding whether the proposal will in the end support the Presidio's financial self-sufficiency goal. The revenue generation goal and financing capability could not be achieved under Alternative 6 (no action) or Alternative 1. Attempts by NPS to implement Alternative 1 under the authority of special interim legislation before the Trust was created failed because no market-based user was capable or willing to implement the proposal.



### **5.3 Desired User or Tenant**

A unique strength of Alternative 5 is that the improvements will be occupied primarily by a known collaborative group of users. The proposal is the only one of the four action alternatives where the proponent will also be the primary user and occupant of the premises. The other proponent-based alternatives each involved speculative uses, making the full tenancy of the project dependent upon who the developer can ultimately attract. For Alternative 5, where the primary users are known, the Trust is best able to assess the user/owners' compatibility with the Presidio's mission and programmatic goals.

### **5.4 Development Concept and Design**

Alternative 5, unlike the other proponent-supported alternatives, offers a signature development unique in the Presidio and the world because of its cutting edge focus on film and innovative development of digital arts and technology. The strength of its programmatic concept is bolstered by a strong site design concept, including a new 7-acre park ("Great Lawn"). The alternative's proposed design reflects the historic Letterman patterns of development with long rectilinear buildings interconnected by galleries. This overall site design is appropriate and responsive to the historic character of the Presidio, and will serve ultimately to enhance the Presidio's cultural landscape. Through application of the Planning and Design Guidelines, there is opportunity to strengthen the design to be more compatible with the National Historic Landmark setting (see mitigation measure CR-1, *Planning and Design Guidelines* in Attachment 1).

### **5.5 Environmental Sustainability**

As compared to the other alternatives, Alternative 5 and Alternative 2 both stand out among other proposals as having highly creative and ambitious environmentally sustainable designs and operational programs (e.g., waste reduction, water conservation, energy conservation, and sustainable building practices). Alternative 5 is further distinguished because its proponents have a proven track record in sustainable design and environmentally friendly building practices (e.g., Skywalker Ranch in Marin County).

### **5.6 Facilities Considerations**

Because Alternative 5 has the fewest buildings, the fewest tenant organizations, and will involve only 12 occupied hours of use per day, it is more advantageous than the other proponent-supported proposals in terms of the demand for facilities services such as refuse, police, fire/rescue, and utility maintenance services. Comparatively, Alternatives 2, 3, and 4, which involve housing and other 24-hour-a-day uses, require increased demands on Presidio utilities, public safety, and communications needs.

### **5.7 Enhancement for Achieving Presidio Goals (Outreach Plan)**

The Alternative 5 proponents also offered a comprehensive outreach and education program that was considered appropriate to the Presidio as a park. Alternative 5 includes an archive of visual effects open to historians and scholars that will enhance the Presidio community by bringing artists, technicians, craftspeople, engineers, researchers and business people to the Presidio. A museum of visual arts and technology that would be open to the public might also be included as an alternative to the archive facility. It includes an Advanced Digital Training Institute that would offer advanced study in computer graphics. An internship program would provide educational opportunities to college students, and the Vision Quest Program would bring local schoolchildren to the site to learn about career opportunities. A public café and coffee bar would serve park



visitors, and the Great Lawn would be a public amenity increasing the open space component of the site. The proponent organizations offered to continue at the Presidio a tradition of community service in part by providing a strong interpretive program using their own innovative technology and techniques to enhance the national park visitor experience.

### **5.8 Market Impact**

In selecting among the alternatives, the Trust considered the potential market impacts of the use of the 23-acre Letterman site on the remainder of the Presidio. The Trust compared each alternative proposal to the real estate already existing at the Presidio in order to identify how each alternative either complements or competes with other Presidio projects. Alternative 5, as compared to other alternatives, offers the greatest opportunity to create synergistic effects with other Presidio leasing efforts. The other three proponent-supported alternatives all have the possibility of having some adverse effect on the leasing efforts for other existing Presidio buildings.

Alternative 2 competes with residential, office, and hotel/conference center uses at the Presidio. Alternative 3 competes with office and hotel/conference center uses, and Alternative 4 competes with residential and office uses. By comparison, Alternative 5 supports leasing efforts for other Presidio buildings by providing a tenant base for housing and a market base for retail/service uses, and attracts complementary office users in the areas of arts, education, research, and entertainment.

### **5.9 Environmental Consequences**

In addition to other factors, the Trust has compared the environmental impacts of Alternative 5 against the other alternatives. A concise descriptive summary of these impacts in comparative form is provided in Table 11 of the FEIS. Each alternative has its own unique mix of unavoidable adverse effects, and the Trust recognizes that implementation of Alternative 5 would have unavoidable adverse effects on any unmet housing demand (given the shortage of housing, including affordable housing, in the City of San Francisco), cultural resources (adverse effects on the cultural landscape within the remainder of the 60-acre complex because no infill development would occur in that area), and short-term noise impacts (to occupants and passive recreational users within the 60-acre complex).

The Trust has determined that, when balanced with economic and other considerations, the environmental impacts of Alternative 5 to surrounding users and to the city are acceptable. This determination is made in light of the Trust's plan, presented below, to carry out mitigation measures and to undertake additional Presidio-wide comprehensive implementation planning. Focused implementation planning will ensure that follow-on projects throughout the Presidio are carried out based upon an evaluation of various development options as the implementation of the 23-acre project within the Letterman Complex proceeds.

### **5.10 Input from Local Community**

The weight of public opinion and comment expressing a preference among the alternatives favored Alternative 5 over any of the other action alternatives. Among the reasons given were the possibilities presented by Alternative 5 for building not only a local community of artists but also for becoming a world-wide center for innovative creative expression, interactive entertainment, and global exchange. Public opinion also favored the proponents' site plan and commitment to community service, leadership in arts and education, emphasis on



research and design, and past record of environmental stewardship. In addition, the public favorably noted the site plan with its commitment to the 7-acre Great Lawn as open space park area.

## **6   *Measures to Minimize Potential Adverse Environmental Impacts***

All practicable mitigation measures identified in the FEIS to avoid or minimize environmental impacts that could result from implementation of the selected alternative will be incorporated into the project. These mitigation measures are discussed in greater detail in Section 4 and Appendix A of the FEIS. As part of the decision to implement Alternative 5, the Trust is adopting a Monitoring and Enforcement Program (MEP) to monitor actual impacts once the project is begun. The MEP provides for the implementation of the mitigation measures as proposed in the FEIS. The MEP describes the actions that must take place as a part of each measure, the timing of these actions, who is responsible for implementation, and the agency responsible for enforcing each action. It has been formatted as a table, and is appended to this ROD as Attachment 1, with the following information:

- *Impact* – Identified in Table 11 and Appendix A of the FEIS;
- *Mitigation Measures* – Taken directly from Section 4.7 of the FEIS;
- *Reporting Stage and Responsibility* – Applicable milestone or phase and agency/individual who will carry out mitigation measures;
- *Responsibility for Compliance* – Agency/individual who will ensure that the mitigation measures are accomplished;
- *Method of Implementation* – How actions will be implemented;
- *Enforcement* – How implementation of actions will be enforced; and
- *Checkoff* – Verification of implementation.

For most of the measures identified in the MEP, the Presidio Trust has ultimate control over and responsibility for their implementation. Therefore, the Presidio Trust Project Manager for the Letterman Complex is the assigned chief monitor. If ultimate control over the implementation of a specific mitigation resides in another agency, the Project Manager will oversee the implementation of a process to ensure coordination with these other agencies and entities in monitoring and enforcement. The Project Manager will track the overall progress of each action, and will make available to the public the results of relevant monitoring upon request.

## **7   *Public Involvement***

Extensive public comment has been requested, considered, and incorporated by the Trust throughout the planning process. The Trust, both on its own and through the GGNRA Citizens Advisory Commission, held fifteen public meetings and workshops in connection with the Letterman Complex. These included two workshops to solicit the public's input regarding appropriate uses for the Letterman Complex prior to the Trust's



receipt of any proposals for the site. In anticipation of the preparation of the DEIS, the Trust held a public meeting to elicit comments regarding the scoping of environmental issues requiring further analysis. The Trust also held a public board meeting and hosted two workshops at which the four short-listed respondents from the RFP presented their detailed proposals. Upon its release, the Trust presented the DEIS to the GGNRA Citizens Advisory Commission and held a public meeting to present an overview of the document. The Trust subsequently held a number of public hearings to receive public comment on the DEIS. After its announcement of a preferred alternative, the Trust extended the public comment period for an additional 45 days. Nearly 1,500 people provided input in public meetings sponsored by the Trust related to the proposed project, and the Trust received more than 300 letters regarding reuse of the Letterman Complex. In addition to the Letterman Complex public meetings and workshops that the Trust hosted, the Trust made presentations at meetings independently sponsored by various neighborhood and community groups, including San Francisco Planning and Urban Research Association (SPUR) and Neighborhood Associations for Presidio Planning (NAPP). Finally, the Trust acceded to requests to delay any actions or a final decision on the Letterman Complex by at least 30 days beyond the 30-day no action period to make additional time available to the public to review the Final EIS.

A more complete description of the history of public involvement throughout the planning process for the 23-acre Letterman project is set forth in Section 5.1 of the FEIS.

## **8   *Response to Comments on the FEIS***

During the extended review period for the FEIS that ended May 18, 2000, a number of parties submitted written comments. All issues raised by comments received during the review period have been carefully considered by the Presidio Trust. The comments received raised no new issues that require modification of the proposed action. Responses to these comments are provided in Attachment 2 (Report Accompanying the ROD). Minor text changes and factual corrections in response to the comments are provided in Attachment 3 (Errata Sheet).

## **9   *Conclusion***

In accordance with the provisions of NEPA, the Trust has considered all of the information in the FEIS and the complete record, including all public comments received. All of the above factors and considerations warrant selection of Alternative 5: the Digital Arts Center, identified as the proposed action in the FEIS, as the development proposal for implementation on the 23-acre site within the Letterman Complex at the Presidio of San Francisco. The EPA published a Notice of Availability of the FEIS in the Federal Register on March 17, 2000 (65 FR 14558). A 30-day no action period ended on April 17, 2000, but was extended 30 days by the Trust (see Enclosure 1 to Attachment 2). This decision will become effective immediately.

This final decision will enable the Trust to move forward to implement the selected proposal. Before any onsite demolition or construction activity begins, however, implementation involves a complex preparatory development process which includes: 1) negotiation of a development agreement that establishes conditions to



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the parties' obligation to enter into a long-term lease agreement and that addresses matters including deconstruction, demolition, abatement of hazardous materials, necessary permits and approvals, and other onsite preparation issues; 2) negotiation of a ground lease that establishes appropriate terms and conditions for the long-term use of the site; 3) performance of preliminary site investigation work such as due diligence investigations for environmental, archeological, and other site-related matters; 4) securing any necessary permits and approvals; 5) soliciting through competitive contracting procedures demolition and construction contractors and negotiation of applicable contract terms; 6) preparing architectural design documents and seeking public and historic preservation agency input.

For further information concerning this decision, contact John Pelka, NEPA Compliance Coordinator, at (415) 561-5300, or at The Presidio Trust, 34 Graham Street, P.O. Box 29052, San Francisco, CA 94129-0052.

Dated: May 24, 2000

APPROVED: \_\_\_\_\_  
James Meadows  
Executive Director, Presidio Trust

DATE: \_\_\_\_\_

