
ATTACHMENT 2
REPORT ACCOMPANYING THE
RECORD OF DECISION

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This report has been prepared to further inform the Presidio Trust (Trust) decision-makers as they prepare to select a development alternative for implementation on the 23-acre site within the Letterman Complex. In April 1999, the Trust released for public comment the *Draft Environmental Impact Statement and Planning Guidelines for New Development and Uses on 23 Acres within the Letterman Complex* (DEIS). Based upon public comments received, the Trust made changes to the DEIS, and in March 2000 released the Final Environmental Impact Statement (FEIS) for the Letterman 23-acre project. The Trust responded to all comments received on the DEIS, and those responses are found in the Responses to Comments volume of the FEIS.

1 Extended Review Period for FEIS

Following release of the FEIS, a number of reviewers sought additional time to review the information in the FEIS and requested the Trust to extend the review period beyond the 30-day minimum required by the National Environmental Policy Act (NEPA) regulations¹ (40 C.F.R. 1506.10(b)(2)). In response, the Trust notified all reviewers that the Presidio Trust Board of Directors did not plan to take any final action or make a final decision prior to its regularly scheduled Board meeting on May 18, 2000. The practical effect of this notice was to extend the NEPA 30-day “no-action” period by another 30 days (from April 17 to May 17, 2000). The Trust further explained in its extension notice that, although the “no-action” period is not a formal comment period, all comments received during the 60-day review period would be considered by the Trust and made a part of the decision record. The Trust’s notice is appended as Enclosure 1 to this report.

2 FEIS Comment Letters

Additional comment letters on the FEIS have been received. Although these letters raise no new issues requiring modification of the proposed action or the planned decision process, the Trust has prepared this report to respond to those comments received during the NEPA “no-action” period in order to better inform the selection decision of the Trust Board of Directors. This report summarizes the additional public comment received during the extended review period for the FEIS, and responds to or clarifies the issues raised, as appropriate.

The Trust received comment letters raising specific concerns from the organizations and entities listed below. The Trust’s responses to the points raised are also presented below.

2.1 U.S. Environmental Protection Agency (EPA)

EPA Headquarters in Washington D.C. comments on its website (<http://es.epa.gov/oeca/ofa/comsum.html>) on all FEISs published in the United States. With regard to the Letterman FEIS, EPA’s comments were limited to

¹ The following organizations and individuals submitted written requests for additional time to review the FEIS: Resourceful Women, Pacific Foundation Services LLC, Diamond Heights Community Association, Potrero Boosters Neighborhood Association, North of Panhandle Neighborhood Association, Greater West Portal Neighborhood Association, Coalition for San Francisco Neighborhoods, Telegraph Hill Dwellers, Rudolph Steiner Foundation and Mr. Donald S. Green.



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stating that “no formal comment letter was sent to the preparing agency” (<http://es.epa.gov/oeca/ofa/may1200c.html>). In addition, representatives of EPA Region IX, with whom Trust staff have maintained contact throughout this EIS process, noted that additions to the DEIS and responses by the Presidio Trust adequately addressed issues raised by Region IX in their letter to the Trust (see letter 62 in the Responses to Comments volume of the FEIS). Region IX staff stated they have no formal objections to the proposed project, and will work with the Trust to address concerns related to comprehensive development plans for the Presidio.²

2.2 As You Sow, Golden Gate Audubon Society, National Parks Conservation Association, Natural Resources Defense Council, San Francisco League of Conservation Voters, San Francisco Tomorrow, San Francisco Tree Council, Sierra Club, and the Wilderness Society (AYS)

The Trust received a March 30, 2000, comment letter from AYS that noted many of the same issues raised in the group’s earlier comments that were responded to by the Trust in the Responses to Comments volume of the FEIS. AYS’s March 30 letter also stated:

At the outset . . . we want to stress how appreciative the commenting groups are of the approach taken by the Trust in this final EIS. . . . None of the many meetings representatives of our groups have had with the Trust staff or even Board members over the past seven months prepared us for the release of a document in which a serious attempt would be made to respond to our concerns. Rather, all of our interactions led us to believe that the final EIS would be as flawed as the draft was

The Trust, however, has published a very different document – one that in fact suggests that it is prepared to change the way it has been doing business. . . . we are hopeful that the playing field has shifted dramatically and that this shift will be confirmed by the Trust’s response (page 1).

The Trust’s response, dated April 11, 2000, to AYS’ letter is appended as Enclosure 2 to this report. The following is offered in addition to the Trust’s April 11 letter so as to be fully responsive to the reviewers’ concerns:

Alternative Levels of Development for 23-Acre Site – AYS continues to criticize the range of alternatives as inadequate for not having looked at alternative levels of development for the 23-acre site. A complete response to this comment has been provided in the expanded discussion of purpose and need for the project in Section 1 of the FEIS and in master responses 6A (Adequacy of Scope of Alternatives) and 1D (NEPA and Tiering from the General Management Plan Amendment (GMPA) EIS). AYS discounts this detailed response, claiming that the decision to focus on 900,000 square feet of development was never subjected to NEPA review. It has, in fact, been properly reviewed under NEPA through this Supplemental EIS process. Moreover, AYS admonishes that “it is NEPA, not the marketplace, that determines the adequacy of the range of alternatives considered in an EIS” (page 7 of AYS letter). AYS’s comment oversimplifies NEPA. Under NEPA, a project’s purpose and

² See electronic mail correspondence dated May 16, 2000 from Leonidas Payne, Attorney – NEPA Review, EPA Region IX to John Pelka, NEPA Compliance Coordinator, Presidio Trust.



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need defines the reasonable range of feasible alternatives. Central to this project's purpose and need is the achievement of a projected measure of market-based financial self-sufficiency. Under these circumstances, NEPA allows the marketplace to help delineate what alternatives are reasonable (Midcoast Interstate Transmission Inc. v. FERC, 198 F.3d 960 (D.C. Cir. 2000) (application dismissed because alternative "had no contracts or other evidence of market support for the project"))).

With respect to the square footage decision, the Trust had a number of compelling reasons for focusing its market-based solicitation on a 900,000-square-foot development:

First, concentrating 900,000 square feet of building space on 23 acres reflects the site's history of intensive use. The area immediately surrounding and within the 23-acre site is one of the only sites on the Presidio that historically has been subjected to intensive development because of its proximity to the urban area and amenities outside the Presidio boundary. Since the late 1890s, when the first Letterman Army Hospital was built, the 23 acres have been used intensively, first as a corridor to the adjacent city of San Francisco neighborhoods, later as a part of the Panama Pacific International Exposition, and finally as one of the busiest military hospitals in the country until the post-war era, when it became a regional medical center serving the surrounding military community (see FEIS Section 1.1.5). Therefore, the area immediately surrounding and within the 23-acre site has had a history of intensive use.

Second, the National Park Service (NPS) envisioned perpetuating the site as a building and activity core. Under interim legislative authority prior to creation of the Trust, NPS carried this approximate footprint through to its 1994 RFQ for the Letterman Complex. The NPS Request for Qualifications (RFQ) assumed retention and reuse of Letterman Army Institute of Research (LAIR) and allowed for new replacement construction predominantly, although not entirely, within the 23-acre site to replace Letterman Army Medical Center (LAMC). Had NPS concluded a lease with the University of California at San Francisco (UCSF) as proposed in the RFQ, it would have involved occupancy by a single large anchor tenant largely within the 23-acre site, an intensity of use roughly comparable to the Army's pre-existing use on the 23-acre site and to the project proposed by the Trust.

Third, there were and are good reasons to concentrate development density in areas where it has been historically concentrated. The site is unique in its access to transit service and urban amenities. It is easily accessible from downtown San Francisco, surrounding residential neighborhoods, and commercial districts, with access via Richardson Avenue to the Golden Gate Bridge. Restaurants, stores, and other commercial establishments are nearby, outside the park entrance. The site is also served directly by public transit connections to downtown San Francisco and regional destinations. All of these amenities are appropriate qualities for a site with concentrated development.



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Fourth, development of this size is needed to yield sufficient income to the Trust to meet the FMP's forecasted revenue for the Letterman Complex.³ Market analyses showed that a development of 900,000 square feet was needed to yield revenues sufficient to make the financial investment badly needed to address building and infrastructure improvements throughout the Presidio. Alternatives that were much smaller were not solicited for development by the Trust because they could not generate sufficient revenue to meet early capital investment needs for the Presidio and because the economics of land development made a smaller project financially unattractive, given the need for the potential tenant to pay the fixed costs associated with redevelopment. The economics of land development are not directly proportional. Many of the costs of development are fixed for any amount of development (for example, demolition of the existing buildings and certain infrastructure development or improvements). If the proposed project were reduced in scale, with no change in quality of construction and open space improvements, the land rent would reduce by more than a proportionate reduction in the scale of development. For example, a reduction to 700,000 square feet would result in a \$2- to 3-million annual revenue shortfall. (See master responses 10A and 10B in the Responses to Comments volume of the FEIS for further explanation.)

Fifth, while the GMPA presented a theoretically desirable site plan, a number of practical marketing considerations warranted consolidating density. Based upon real estate marketing concepts, the Trust determined that revenue-generating potential could be severely constrained unless development was contained within a site that could be easily marketed and managed. In addition, marketability could be improved by focusing infrastructure improvements in a limited area and by focusing on a contiguous site that would not otherwise be broken up by roadways or other buildings. Also, focusing the development on a limited parcel would make the offer more economically attractive to a larger universe of potential submitters and would increase the likelihood of receiving viable development proposals from a single master tenant. Dealing with a single master tenant could significantly simplify the lease negotiation process as compared to disbursing development through the 60-acre complex, which would likely have involved creating separate leases for multiple parcels.

These marketing considerations were factored together with the GMPA's severe limitation on the amount and location of new construction at other Presidio sites. The 23-acre site, an area of the Presidio that is already built out, is by far the largest among the limited number of sites identified in the GMPA for potential new construction. No other parcel at the Presidio could accommodate as large a development offering under the constraints of the GMPA.

Related to this consideration was the absence of historic buildings on the 23-acre site. In general, newly constructed buildings command higher rental rates than do rehabilitated historic buildings. Unlike the remainder of the 60-acre complex, the 23-acre site did not contain historic buildings, which add complexity and

³ AYS claims that the Trust was required to subject its FMP forecast for how it planned to achieve a declining budget appropriation to NEPA review. Congress directed the Trust to submit the FMP within one year after the first meeting of the Board of Directors to offer a declining appropriations plan. Impact statements are not required on appropriation proposals, and therefore the FMP itself is not subject to the NEPA mandate (Andrus v. Sierra Club, 442 U.S. 347 (1979)). The exemption of budgetary proposals from the impact statement requirement does not, however, exempt the Trust from preparation of an impact statement on actions taken in response to the appropriation decisions as the Trust has done here with the Letterman Complex EIS.



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higher project costs, bringing down the revenue generation potential of a development offer. Thus, given the number of historic buildings elsewhere within the Letterman Complex and at built-out areas of the Presidio other than this 23-acre site, there are limited opportunities for new construction on the Presidio at a scale that could satisfy the Financial Management Program (FMP) financial parameters for the Letterman Complex. This previously developed site, which already had over 800,000 square feet of existing but outdated non-historic building space, presented a singular opportunity to offer a contiguous parcel for new development, a rarity in San Francisco. Furthermore, because of the mandate to preserve and reuse the many historic buildings, few, if any, other opportunities exist for a project of this type that is capable of generating the needed revenue. Where the GMPA severely limited the amount and location of new construction at other Presidio sites, at this site alone the Trust could propose development of a sufficient size with capacity to generate the revenues needed to fund the maintenance and rehabilitation of badly deteriorating buildings and infrastructure at the remainder of the Presidio.

Lastly, the GMPA proposes a scale of development for the Letterman Complex to which this project adheres. This size development does not represent significant new construction over and above that which already exists at the 23-acre site. Rather, it is replacement construction that generally reflects the existing development footprint of LAMC and LAIR. The GMPA itself contemplated development within the Letterman Complex on the scale proposed here by the Trust, albeit under a different site plan (i.e., retention of LAIR and a portion of the new construction would be infill construction across the 60 acres). To the extent the proposed layout of the development has departed from the GMPA, that departure has been fully analyzed under this FEIS.

For all these reasons, the Trust considered it rational to focus its solicitation on 900,000 square feet of new replacement development within the Letterman Complex.

Conformity of Proposal to GMPA's Square Footage Limitation – AYS commentors claim that the inclusion of underground parking space as an aspect of the proposed action results in the project impermissibly exceeding the 1.3-million-square-foot building space limit provided under the GMPA for the Letterman Complex. This comment was first raised in the DEIS. The commentors asked why underground parking areas are not included as part of the building area calculation. With regard to the square footage allocated to parking, text has been added to Section 2, Alternatives, to identify the proposed square footage of structured parking under each alternative. Square footage for structured parking, as defined in the Building Owners and Managers Association International's *Standard Method for Measuring Floor Area in Office Buildings [BOMA Standards]*, is not considered rentable square footage and therefore was not calculated into the proposed replacement construction figures. This is consistent with current industry practice, in which underground parking is not calculated into the gross floor area of new construction, as demonstrated in the San Francisco Planning Code, Sections 102.9 and 204.5. Rather, parking requirements are directly related to building square footage and use category. Likewise, square footage for surface parking was also not calculated into new construction square footage totals (see master response 11, Derivation of Proposed Building Area, in the Responses to Comments volume of the FEIS).



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AYS commentators now claim that the Trust's approach is flawed because the GMPA included all underground space in its 1.3-million-square-foot total for the Letterman Complex, and therefore the Trust cannot look to BOMA standards. AYS is mistaken. The GMPA only included a small subset of habitable or useable underground space in its square footage totals. The initial building inventory conducted for the Presidio in support of the GMPA planning efforts was largely based upon the existing inventory on file in the Army records, supplemented by a limited condition assessment inventory. The reference manual, methodology, and conclusions for this inventory (*Building Inventory Summary Report*, April 1992, Architectural Resources Group) is part of the decision record and can be found in the Park Archives as well as the Presidio Trust Library. Selected buildings' exteriors were spot-checked for measurements in the field and gross square footages from the Army's data were entered. As part of this inventory, only gross square footage of finished basements were included.

When this survey was conducted, there were (and still are) no underground parking garages that would have been included in the inventory. Some standing garages that had been converted to storage use, adjacent to residential areas, were included in the overall inventory because they are standing structures with four walls and a roof and are considered habitable space for uses other than parking automobiles. Uninhabitable underground space was not. External, surface lot parking (the dominant form of parking found at the Presidio) was documented in the parking inventory completed as part of the transportation technical analysis for the GMPA; it was also not included in the building inventory.

Because no underground parking structure existed at the Presidio at the time of this inventory, there was no precedent for including underground parking in the total gross square footage calculations for the Presidio. Therefore, for the Letterman EIS, the Presidio Trust looked to other outside standards related to the issue and determined to rely upon both the Building Owners' and Managers Association International's Standard Method for Measuring Floor Area in Office Buildings, as well as the City of San Francisco's Planning Code. The SF Planning Code (Section 102.9) "excludes floor space used for accessory off-street parking and loading spaces . . ." These two existing standards provided a rational and reasonable methodology to calculate the square footage of the development project, and also supported the GMPA's approach of generally excluding uninhabitable underground space when calculating the size of the proposed development.

Alternative Levels of Development for the Park – The AYS commentators also would have liked the Trust to analyze alternative levels of development for the Presidio as a whole. A comprehensive plan for the Presidio already exists in the GMPA. The GMPA comprehensively addresses a plan for 13 major planning areas at the Presidio and other resource management plans, including natural areas, visitor services, transportation, and sustainability. The need for a certain site-specific modification was necessitated at the point that UCSF and other medical research users withdrew as potential tenants, making the project envisioned by the GMPA at the Letterman Complex infeasible. Given the infeasibility of the UCSF option, the Trust sought in its RFQ and subsequent actions to solicit proposals comparable in size, stature, and location to UCSF's while seeking simultaneously to fulfill the Trust Act's self-sufficiency requirement.



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For purposes of this Letterman Complex project and this EIS, the Trust did not need to look at alternative levels of development across the Presidio because, as stated above, the GMPA had generally set the level of development for this planning area and the Trust is adhering to it. Under the GMPA, the Letterman Complex has been considered and analyzed among all of the proposed developments within the Presidio, and through the Supplemental EIS the effects of any changes to the plan as contemplated in the GMPA have been analyzed.

Given the Trust's reliance on the GMPA as the foundational planning document, NEPA does not require the Trust to have looked at alternative levels of development for the Park as a whole in this Supplemental EIS. Nevertheless, these reviewers and others have expressed desire for the Trust to better explain how it intends to implement the GMPA Presidio-wide in view of the need under some circumstances, as here, to depart from the site-specific proposals of the GMPA in certain respects. The Trust, therefore, has committed to a planning effort that will encompass all of Area B of the Presidio under the Trust's administrative jurisdiction. This planning will take into account intervening events that have altered the GMPA's site-specific assumptions, changed circumstances and new opportunities that have arisen since the 1994 GMPA was finalized, and new Trust mandates. The Trust expects the product of the planning effort to be an update of the 1994 GMPA for Area B of the Presidio with an associated supplemental environmental impact statement to the 1994 GMPA EIS. The Trust anticipates their formal scoping will begin in July 2000. And, directly relevant to the reviewers' concern raised here, this comprehensive planning effort will look at a range of development alternatives throughout Area B.

Enforcement of Historic Compliance Guidelines – The AYS commentors continue to raise concerns that the planning and design guidelines will not be strictly enforced, and therefore they cannot be relied upon to mitigate or prevent impacts. This view reflects a continuing misunderstanding of the guidelines, their development, and their intended application. The Programmatic Agreement (PA) for the Letterman Complex, which was under negotiation throughout the EIS process, is now final. It is attached to the FEIS as Appendix F. The PA is the tool to ensure that the selected development alternative satisfies historic compliance guidelines. The PA and the compliance process it specifies have been adopted as a mitigation measure to ensure historic compliance.

Under the PA, the Final Planning Guidelines published in the FEIS will be incorporated into final overall design guidelines for the Letterman Complex (Final Guidelines) and will therefore be applied and continue to provide direction through the PA's consultation and design review process. Under the agreement, the Trust "will ensure that all . . . documents . . . developed for new construction within the Letterman Complex . . . conform to the fullest reasonable extent to the Final Guidelines" developed under the PA (Programmatic Agreement at Section V.A). To the extent the adverse effects on cultural resources that have been identified in Section 4.5.12 of the FEIS can later be mitigated through the implementation of the Final Guidelines under the PA, the Trust will do so. Through this process, the Trust will ensure that selected development plans, at each stage of development, comply with sections 106 and 110 of the NHPA. Through this process under the PA, review of the application of the Final Guidelines by the Advisory Commission on Historic Preservation (ACHP), State Historic Preservation Officer (SHPO), NPS, and the public will continue after the environmental review process for this action is concluded and will ensure compliance with historic preservation obligations.



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It is important to bear in mind that the NEPA process does not terminate with the finalization of an EIS and the execution of a Record of Decision. Unlike the Council on Environmental Quality (CEQ)'s predecessor "guidelines," which were confined to §102(2)(c) of NEPA, the EIS provision (40 C.F.R. §1500.3) and the current CEQ NEPA Regulations apply to the whole of §102(2), the action-forcing provisions of the Act. The NEPA process starts with "early planning," (§§1501.1, 1502.2), goes through a possible Environmental Assessment stage (§1501.3), to the EIS (if that proves warranted, §§1501.4, 1502.3, 1502.9), to a Record of Decision (§1505.2) and to "implementing the decision," which may include monitoring, mitigation, and reports on progress in carrying out such mitigation (§ 1502.3). The Planning and Design Guidelines are, like the Monitoring and Enforcement Program (MEP, Attachment 1), very much part of this ongoing NEPA process (§1508.21).

Planning Guidelines Have Been Changed without Explanation – AYS comments that the Planning Guidelines have been changed without explanation. Changes made to the guidelines between the draft and final version were made primarily to clarify meaning, correct errors, use uniform language, and provide focus on the 23-acre site. For example, diagrams were changed substantially to omit references to infill construction in the historic hospital complex or that would impinge on the Tennessee Hollow riparian corridor, since such infill construction would not occur under Alternatives 2 through 6. The change to Guideline B-16, the O'Reilly commons, is not a weakening of the guidelines but rather a change in thinking about the purpose of the commons based upon evaluation of how the alternative proposals developed central open spaces elsewhere on the site. The O'Reilly commons diagram changed (i.e., the draft established an optimum size while the final diagram focuses instead on setting a minimum standard) and new language was added clarifying its measurement.

Information on Trees – AYS commentators are correct in asserting that the FEIS contains new information about the trees on the site.⁴ In response to a comment on the DEIS by the San Francisco Tree Council, a tree survey under the direction of the Trust was performed to quantify the removal of up to 317 of the 408 non-native mature trees on the site. The effect of this removal was previously identified on page A-13 in the DEIS ("the removal of non-native trees at the site would decrease the number of trees available for nesting birds"). The analysis in the DEIS determined that non-native tree removal would not be a significant impact because the most valuable wildlife habitat onsite would be protected (see mitigation measure WL-1, *Ornamental and Native Plant Protection*), and that restored native and non-native plant areas would provide new habitat for nesting birds. This new information was provided in the FEIS for full disclosure and suggested no new conclusions on the effect of tree removal previously analyzed in the DEIS.

Given the requirements of site clearance and grading, and the early phase of site design, it would be extremely difficult to determine whether the number of trees to be removed for each alternative would vary. Therefore,

⁴ However, the assertion in footnote 3 of the letter that the DEIS "contained no information about the trees on the site" is not supported by the facts. Please refer to pages A-13 and A-14 of the DEIS' discussion of the importance of protecting the significant trees on the site including the palms and the large oak trees within the 23 acres. In addition, the value of preserving the large eucalyptus and Monterey pines, despite their introduced status, is discussed on page A-15.



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for the purposes of impact assessment, the FEIS takes a conservative approach by assuming that all trees would be removed in construction areas. In practice, however, as noted on page A-14 of the FEIS, as site planning evolves, the Presidio Trust will attempt to reduce the number of trees that are to be removed from the site (from the estimate provided in the FEIS), and will relocate mature trees to other locations, both on and off the Presidio. Efforts will be made to preserve the lives of these trees and to reduce the overall number of trees to be relocated.

Information on Water Demand – AYS commentors are correct in noting that water demand under Alternative 5 and cumulative overdraft has increased from the estimates provided in the DEIS. The reason for the difference between the estimates in the DEIS and FEIS is noted in footnote g on page 119 of the FEIS (“includes 8,197 gpd of recycled storm water used for irrigation”). However, an error in estimating the demand for Alternative 5 has been noted and is corrected in Attachment 3. The corrected water demand is less than what was reported in the FEIS (72,223 gallons per day instead of 84,574 gpd) and the baseline water allotment for the site (88,798 gpd), but more than what was previously reported in the DEIS (64,026 gpd).

Information on Housing and Road Intersection Conditions – The AYS commentors note that for the first time, readers learn in the FEIS that Alternative 5 will have a significant negative impact on the availability of low and moderate housing in the Bay Area. As noted in the Trust’s response to a comment by the city of San Francisco, the determination as to whether a less than one percent increase in demand for housing would be considered a significant impact is somewhat subjective (the city of San Francisco opined that *any* unmet housing demand would be significant). Nevertheless, in deference to the city, the shortage of housing for low- and moderate-income groups was noted in the FEIS, and the text in Sections 4.3.5.1 and 4.5.5.1 of the FEIS was revised from the language in the DEIS to call attention to the potential adverse impact on affordable housing in the city.

The AYS commentors also assert that new information also makes clear that there will be poor operating conditions at the intersection of Lyon and Lombard streets. The FEIS did not offer any additional information regarding the negative traffic impacts of Alternative 5 beyond what was provided in the DEIS. As in the FEIS, Section 4.5.7.2 (page 164) of the DEIS stated that both the intersection of Lombard Street/Lyon Street and the intersection of Presidio Boulevard/Lombard Street would fail in the p.m. peak hour under Alternative 5 without the recommended mitigation measures.

Implementation of Proposed Traffic Improvements – The AYS commentors note that necessary approvals, permits, and funding for the Caltrans intersection improvements have not been obtained. Although funding sources for the intersection improvements have not specifically been determined, the Trust will ensure funding to make the improvements identified. Prior to final design, the Trust will be entering into a Cooperative Agreement with Caltrans to include a funding agreement (see mitigation measure TR-1, *Lyon Street/Richardson Avenue/Gorgas Avenue Intersection Improvements* in the Monitoring and Enforcement Program in Attachment 1). This agreement cannot be finalized until acceptance by Caltrans of the Richardson Avenue Project Study Report/Project Report (PSR/PR).

The Presidio Trust will be working closely with Caltrans, through the PSR/PR process, and the project development team to ensure concurrence on the direction of the proposed intersection mitigation measures as



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the project progresses. Obtaining permits from Caltrans for this project will occur after a satisfactory resolution of the PSR/PR and after final design has been completed. Caltrans regulations do not permit obtaining an encroachment permit prior to final design acceptance.

Environmental Consequences of Proposed Water Treatment Plant – The AYS commentors suggest that the new water treatment plant identified in the FEIS as mitigation would have environmental consequences that are not acknowledged or analyzed. The impacts of water reclamation are discussed on page 38 of the Responses to Comments volume of the FEIS. In addition, the mitigation measure specifies performance standards (e.g., compliance with water quality criteria, treatment processes, treatment reliability, monitoring and reporting, and restrictions for use of reclaimed water established by the California Department of Health Services in Title 22, Division 4 (Environmental Health) of the California Administrative Code) to ensure that the reclamation plant is safe, reliable, and protective of public health.

Implementation and Enforcement of Mitigation Measures – The AYS commentors ask which mitigation measures will be implemented and enforced. All mitigation measures identified in the FEIS to avoid or minimize environmental impacts that could result from implementation of the selected alternative have been deemed feasible and will be incorporated into the project. As part of its decision to implement Alternative 5, the Trust will adopt a Monitoring and Enforcement Program (MEP, Attachment 1) to ensure that the developer complies with them (including the Planning and Design Guidelines). Enforcement will occur through the actions that have been identified in the MEP that must take place as a part of each measure. The MEP also identifies the timing of these actions, who is responsible for implementation, and the agency responsible for enforcing or ensuring compliance with each action.

Effectiveness of TDM Program – The AYS commentors ask what will happen if the TDM program does not achieve the modal split established in the MEP. Based on traffic count monitoring and user surveys, Presidio-wide TDM strategies found to be ineffective or underutilized would be improved or replaced with other measures. The Letterman Complex lease would include provisions requiring implementation of appropriate TDM measures.

Inconsistent Information – The AYS commentors assert that the FEIS contains confusing and inconsistent information about key issues. AYS cites that, according to the FEIS, the Presidio is both easily accessible from downtown San Francisco and far from downtown. The FEIS also states at one point that 300 employees under Alternative 5 will reside on the Presidio and 265 at another. The Trust apologizes for any confusion the statements may have caused. Both statements should be understood and must be explained in the larger context of the discussion in the FEIS. With regard to proximity to downtown San Francisco, the Trust was only suggesting that the site is easily accessed from downtown from a real estate market perspective (say, compared to development opportunities in Pleasanton or San Jose). Later, the FEIS made reference to the site as being far from downtown from a mass transit point of view, because the Presidio has a lower transit mode split than sites located more conveniently to the MUNI bus and rail network, and hence has less impacts on MUNI.



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With regard to housing, the Trust was referring to the proponent's request for 300 units of Presidio housing for its employees as part of its ground lease (housing demand), and later, to the smaller number of units (265) assumed to be available within the Presidio to satisfy this demand.

2.3 Natural Resources Defense Council (NRDC) and National Parks Conservation Association (NPCA) Together with Letter from Donald S. Green

A follow-on letter dated May 3, 2000, from NRDC and NPCA reacting to the Trust's response (Enclosure 2 to this report) to AYS's March 30, 2000 letter above, raised two points.⁵ First, NRDC and NPCA continue to dispute the conclusion regarding recirculation stating that "unreleased information about . . . impacts" requires the preparation of a supplemental EIS (citing CEQ regulation 1502.9(c)(1)(ii)). The Trust did not, as suggested, fail to consider this provision. Rather, this provision is inapplicable to the circumstance here and does not lead to the conclusion that a supplement to the EIS is required. The Trust has provided additional analysis and clarifying information in the FEIS. The refinements reflected in the FEIS as compared to the DEIS, such as acknowledgement of unavoidable adverse effects and the strengthening of the cumulative impacts analysis, are improvements made as a result of the Trust's careful and thoughtful consideration of public comment. This is among the important aims of – indeed may be the essence of – moving from a draft to a final version of an EIS. The CEQ regulation cited by NRDC and NPCA is not meant to be read to suggest that whenever an agency improves or adds to its analysis between the draft and final version of an EIS, a supplemental EIS is required.

Quite to the contrary. The goal of the draft/final distinction in the EIS (40 C.F.R. §§1502.9(a) and (b)) is to encourage public and agency comment and provision of new information and insights such that the Final EIS will be a document which improves upon what was presented in the Draft EIS. In responding to such comments in FEISs, agencies are specifically required to supplement, improve, or modify the analyses as well as to make factual corrections, and in appropriate circumstances, to modify the alternatives including the proposed action (40 C.F.R. § 1503.4). That is what is expected to occur with all EISs. Indeed, if any new information were enough to trigger yet another round of comments and responses, the NEPA process would never end. Furthermore, such an obligation would deter agencies from responding wholeheartedly in the FEIS to comments received as, indeed, this commentor has specifically complimented the Trust for doing in this instance.

Rather, CEQ set a deliberately high threshold for the preparation of a supplemental EIS – "significant new circumstances or information" which must be relevant to environmental concerns and which must bear on the proposed action or its impacts (40 C.F.R. § 1502.9(c)(1)(ii)). This use of the "significance" threshold for supplementation is essentially the same test as that for an EIS in the first instance.

Supplementation must be distinguished from another situation, one confined to Draft EISs, where a DEIS is "so inadequate as to preclude meaningful analysis." In such an instance, a revised draft must be recirculated. (40 C.F.R. § 1502.9(a)). The Trust did not conclude, at the DEIS comment stage, that the DEIS was "so inadequate"

⁵ In addition to the responses to NRDC and NPCA provided here, the Trust sent a supplemental letter, dated May 16, 2000, responding to specific matters the organizations had raised concerning the Trust's comprehensive planning process. The Trust's May 16, 2000 letter is attached as Enclosure 4 to this ROD Attachment 2.



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as to fall within the purview of this recirculation requirement, which does not apply to FEISs. Rather, the draft EIS provided sufficient analysis and scope to allow commentors to focus comments with specificity. This is indication enough that the standard was met and no recirculation is required.

Because the Trust improved and modified its analysis of impacts in response to comments, the commentors suggest that the Trust has met the “significance” threshold and must “recirculate” the FEIS. The Trust has concluded that the recirculation provisions, which apply only to DEISs, are inapplicable, and that the supplementation threshold has not been met. A factor to be considered is mitigation measures. Here, further analysis between the draft and the final EIS elaborated upon potential impacts related to such topics as the cultural resources, cumulative effects, wastewater, and traffic. In each instance, the Trust determined that the potential impact would be wholly or partially mitigated through the measures identified in the EIS to reduce these potential impacts below the level of significance. No supplemental EIS is required.

The comment letter also raises again the adequacy of the alternatives analyzed, claiming that based upon review of the background financial information cited in the FEIS, the Trust apparently never considered a development solicitation proposing a lower level of development than 900,000 square feet. A letter dated May 11, 2000 from Mr. Donald S. Green raises the same concern. In fact the Trust did consider the economics and financial return that would result from a smaller alternative by having considered alternative revenue scenarios as it developed the FMP. These FMP forecasts were later considered as part of the reasoning for having focused the development on a 900,000-square-foot market offering. In addition, as part of this EIS process, the Trust has considered the financial effects of a smaller development scheme and determined that it is inconsistent with the FMP’s goals for the Letterman project (see master response 10A in the Responses to Comments volume of the FEIS for a more complete discussion). A complete summary of the reasons considered by the Trust for having focused its alternatives in this way is presented above in response to AYS concerning alternative levels of development for the 23-acre site. The Trust’s purpose and need for this project allowed it to focus its alternatives analysis in this way.

Mr. Green’s letter suggests that because of the increase in the commercial real estate market in San Francisco, the Trust could consider a project of smaller scale that would generate the same amount of revenue. This approach is inconsistent with the purpose and need for this project. The Letterman 23-acre development is needed as the “economic engine” for the Presidio — the necessary means to generate sufficient revenues early in the GMPA’s implementation to address the critically deteriorating condition of other Presidio facilities. Even though commercial rent values have increased since the release of the RFQ soliciting the 23-acre development, the Trust is relying upon Letterman lease revenues to fuel other programs, investments, and capital improvements at the Presidio as a whole. Therefore, a development of 900,000 square feet is still both needed and desirable in order to maximize development income from this project. It is through the Trust’s additional comprehensive planning for the remainder of the Presidio that the Trust and the public will then have the opportunity to consider options for and analyze how the Letterman revenues can best be used.

2.4 California Native Plant Society

The Trust received an April 3, 2000 letter from the California Native Plant Society discussing the applicability of the NPS Organic Act and the GGNRA Act to the Presidio and claiming that the Trust is “too easily”



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dismissing the park management and preservation goals of these statutes. A portion of the Trust's response is excerpted here:

You separately have raised a concern about the applicability of the National Park Service Organic Act and the Golden Gate National Recreation Area Act to the Presidio Trust. Purely as a legal matter, Congress did not make the NPS Organic Act technically applicable to the Trust. That said, the Trust fully recognizes that the Presidio is and remains part of the GGNRA. In creating the Presidio Trust, Congress directed that the Trust manage the leasing, maintenance, rehabilitation, repair and improvement of property within the Presidio under its administrative jurisdiction in accordance with the purposes of the GGNRA Act. Rather than focus on the technical legal applicability of the GGNRA Act or the NPS Organic Act, the Trust prefers to emphasize its obligation to preserve and protect the Presidio as a national park in accordance with the important principles of park preservation and protection set forth in the GGNRA Act and the NPS Organic Act, and to assure you and others of its commitment to these principles.

The Trust's complete response, letter dated May 1, 2000 to Mr. Pete Halloran, is appended as Enclosure 4 to this report.

2.5 National Trust for Historic Preservation, Western Office

As a concurring party, the National Trust concurs with the process set forth in the Letterman Complex Programmatic Agreement (PA) for development and review of design guidelines and design plans. The Western Office of the National Trust for Historic Preservation submitted an April 14, 2000 comment letter on the FEIS that begins:

The National Trust for Historic Preservation would like to begin our comments on the Final EIS with recognition and praise for a much improved document. We were pleased to see such detailed responses to our comments on the Draft EIS, affirmation of the Presidio Trust's commitment to the GMPA as its principal guide for all planning at the Presidio, a promise to undergo additional comprehensive planning at the site, inclusion of the financial management plan in the FEIS, a more detailed discussion of the impacts to the National Historic Landmark District from the preferred and other alternatives, and greater attention to interpreting the history of the Presidio at the Letterman site (page 1).

Following that general comment, the letter turned to specific questions and comments on the FEIS and sought clarifications on a few issues that the National Trust believed had not been adequately addressed in the FEIS.

Enforcement of Historic Compliance Guidelines – Like the AYS commentors, the National Trust remains concerned about the discretionary nature of the Planning and Design Guidelines and the unknown nature of the Trust's design and construction review process as means to avoid and mitigate impacts to the National Historic Landmark (NHL). The National Trust, although a concurring party on the Letterman Complex PA, comments that without mandatory application of the Guidelines, reliance on the process of the PA is inadequate to mitigate potential impacts.



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There is no inconsistency in treating the Planning and Design Guidelines as both discretionary in some respects and as the assurance needed for conformity of new construction with the NHL setting. The assurance of compliance with the Guidelines sought by the National Trust will be available through the redundant system of reviews, checks, and balances built into the PA. Before the Trust can implement any aspect of the proposed design and construction, not only the SHPO, but NPS, and the public (including the National Trust and others with historic preservation interests) will have had repeated opportunities to review and comment on the extent to which the proposed design achieves compliance with the Guidelines as provided for in the PA. This aspect of the PA process affords interested agencies and the public a higher level of historic compliance review than is ordinarily afforded a project like this involving new construction.

The National Trust also reiterates a concern that the “proposed development already appears inconsistent with the Guidelines.” It is worth restating the Trust’s intent to ensure that the project design and construction ultimately conforms as closely as practicable to the Final Guidelines. Nevertheless, the guidelines themselves identify priorities and goals that may in their application be at odds with one another, necessitating tradeoffs among them. To the extent that the project as proposed is not now or may not in the future be consistent with the Final Guidelines, these departures have been identified and analyzed and the Trust will work to assure that these departures are minimized according to the terms of the PA. (For a complete discussion of the historic compliance process for the Letterman project, please refer to Section 1.4 of the FEIS and master responses 7A and 7B in the Responses to Comments volume of the FEIS.)

Scenic Views and View Corridors – The National Trust agrees that removal of LAMC will improve views at the site, but poses several questions about scenic views and view corridors as they would be affected by Alternative 5. First, views from Lincoln Boulevard looking east toward the DAC will be broad views looking into the complex and do not play the same role as view corridors, such as Edie Road and Torney Avenue, which would provide visual linkages within the Letterman Complex. At points along Lincoln Boulevard, existing open space (in the form of lawn areas) and existing trees provide a foreground with vegetative screening which will prevent the 4-story structure from having negative impacts on Lincoln Boulevard.

Views from the historic Letterman Complex down Edie Road consist of a straight-on view of a portion of the 3-story building façade. Next to this building is a gap approximately 50 feet wide, and then the gable end of a 2-story bar building. This gap provides entry into an internal service courtyard, which is concealed from view. Improvements to this view corridor might include adjustments to the alignment of the gap and elevation and massing adjustments to better respond to the view corridor.

Traffic and Transportation – The National Trust raised two concerns regarding traffic and transportation. The first concerned precautionary measures to protect the buildings and pedestrians from vehicular traffic in this tightly restricted area. The one-way exit from Gorgas Avenue will be studied more thoroughly through the Richardson Avenue PSR/PR. In developing and refining the alternative configurations of both internal and external roadways, pedestrian safety will be a high priority and adequate measures will be taken to provide for pedestrian safety and to ensure protection of adjacent buildings as necessary. These details will be worked out as part of the PSR/PR process.



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Second, the National Trust sought clarification of how the funding and permitting for the reconfigured vehicular access routes to the Letterman development would be coordinated. Although a funding source for this project has not specifically been determined, the Trust will assure funding to make the necessary intersection improvements. Prior to final design, the Trust will be entering into a Cooperative Agreement with Caltrans to include a funding agreement. This agreement cannot be finalized until acceptance of the PSR/PR.

The Presidio Trust will be working closely with Caltrans through the PSR/PR process and Project Development Team to insure concurrence on the direction of the proposed intersection mitigation measures as the project progresses. Permit issuance from Caltrans for this project will occur after a satisfactory resolution of the PSR/PR and after the final design has been completed. Caltrans regulations do not permit obtaining an encroachment permit prior to final design acceptance. A construction schedule for this project has been identified following the completion of the PS& E; this schedule provides for completion of the intersection improvements prior to the opening of the development alternative. These improvements are not necessary for construction related traffic movements.

2.6 California Department of Transportation

In its April 5, 2000 letter, the California Department of Transportation (Caltrans) restated concerns about traffic operation and safety impacts of the proposed new intersections as outlined in the FEIS. The Trust has since met with Caltrans and is now engaged in a process that both parties agree is designed to result in responsiveness and an adequate resolution of Caltrans' concerns. The Trust's complete response to Caltrans, by letter dated May 11, 2000 to Mr. Harry Y. Yahata, and Caltrans' letter dated May 16, 2000 acknowledging that the two parties are moving toward a mutually agreeable solution of Caltrans' concerns as part of the PSR/PR process are appended as Enclosures 5 and 6 to this report.

2.7 Sierra Club and Correspondence from Jack Appel, Lewis Ellingham, Don Hodge, Matt Jalbert, Robert E. Johnson, Edward A. Mainland, Patrick McSweeney, Ron Patterson, and Noreen Weeden

By letter dated April 12, 2000, the Sierra Club requested to meet with the Trust to discuss fee parking generally and specifically as it could be applied to the Letterman project. In addition, a number of individual commentators noted above submitted comments raising the same concerns. The comments challenged the allocation of more than 1,500 parking spaces to the Letterman development on the 23-acre site and the absence of a market rate parking charge for the projected 2,500 site employees as being inconsistent with a goal to reduce driving at the Presidio. On April 21, 2000, Trust staff met with the Transportation Chair of the Sierra Club and determined that no modification of the project is warranted based upon the comments received. For a more complete response to the concerns, please refer to master responses 19 and 20 in the Responses to Comments volume of the FEIS.

2.8 Tides Foundation and Tides Center

In a letter dated May 8, 2000, the Tides Foundation and Tides Center submitted comments on the FEIS stating

[W]e would like to first express our appreciation for the thoughtful manner in which the Trust has attempted to respond to our concerns on the draft EIS . . . We would also like to acknowledge the



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Trust's responsiveness to public requests for additional time in which to reply to this important document.

The FEIS and [responses to comments] provide new and significant information indicating, among other things, a willingness on the Trust's behalf [sic] to move toward a more comprehensive and publicly articulated plan for both the Letterman Complex as well as the entire Presidio. While we applaud this change, there still remain a number of broad and conflicting statements, which keep us from fully supporting the Final Letterman EIS." [page 1]

From these initial comments, the commentor went on to request information and clarification regarding the Trust's comprehensive planning as a demonstration of the Trust's good faith intentions to make the renewed comprehensive planning process for the Presidio meaningful. The Trust's initial response to the specific commitments sought is set forth in the letter dated May 17, 2000, appended as Enclosure 7 of this ROD Attachment 2.

2.9 Neighborhood Associations for Presidio Planning (NAPP)

By comment letter dated April 12, 2000, NAPP representing 10 neighborhood associations adjacent to the Presidio offered comments specific to the Letterman Planning and Design Guidelines. They wrote (1) seeking to ensure open space through the development of the 7-acre "Great Lawn" and through building development that "would not turn its back on the adjacent neighborhood"; (2) proposing alternative scales of development within the 23-acre site rather than a "fine-grained" pattern of development; and (3) objecting to the development of streets in the interior of the site and to using streets as the means to preserve view corridors. None of these comments warrant changes to the proposed action.

2.10 Margaret Kettunen Zegart

The commentor suggests that the entire Letterman Complex should be landscaped as a condition of occupancy of the 23-acre site. While the Presidio Trust is in support of landscape improvements within the unaffected portions of the complex, this would be difficult to impose upon the proponent of Alternative 5. The commentor also questioned the adequacy of traffic mitigation measures and the absence of square footage caps in the Planning and Design Guidelines. These issues are discussed in master responses 7A and 19 in the Responses to Comments volume of the FEIS.

2.11 Correspondence from Supervisor Candidate Davy Jones, Bea Kronert, and Jill Griffin

The Trust received a number of letters listed above generally reflecting support of the proposed action at the Letterman Complex.



Enclosure 1



April 10, 2000

Dear Presidio Trust Supporter:

By this notice, the Trust is informing interested parties that additional time is available to review the Final Environmental Impact Statement and Planning Guidelines for New Development and Uses on 23 Acres within the Letterman Complex (Final Letterman EIS or FEIS) beyond the minimum 30-day no-action period. The Presidio Trust Board will not take any action or make a final decision on the Final Letterman EIS prior to the Board's regularly scheduled meeting on May 18, 2000. The effect of this decision is to extend the final review period for about another month.

Because the 30-day no-action period is not a formal comment period, it does not establish a formal comment deadline. Nevertheless, as part of its own internal final review, the Trust will consider all public views and comments provided to help inform the Board's decision and received prior to formal Board action.

On March 17, 2000, by publication of a notice in the Federal Register, the Presidio Trust formally released the Final Letterman EIS for public review. The National Environmental Policy Act (NEPA) requires that no decision on the proposed Letterman Complex action be made or recorded by the Presidio Trust until at least 30 days after publication of the notice of the FEIS in the federal register. A number of FEIS reviewers have requested additional time to review the FEIS beyond April 17, 2000, the minimum 30 days available under NEPA. The Trust wishes to be responsive to these requests and is thus providing notice of the additional review time available.

COPIES OF THE FINAL LETTERMAN EIS The Final Letterman EIS can be reviewed on the Presidio Trust web-site at www.presidiotrust.gov by clicking on "Library" and then "Postings" or by reviewing a copy at the Presidio Trust Library at the address below (Trust Librarian: Barbara Janis (415) 561-5343). A copy of the Final Letterman EIS can be obtained by making a request to:

NEPA Compliance Coordinator - Attn: Letterman Complex
Presidio Trust
34 Graham Street, P.O. Box 29052
San Francisco, CA 94129-0052
Fax: 415-561-5315
E-mail: planning@presidiotrust.gov

FOR FURTHER INFORMATION CONTACT John Pelka, NEPA Compliance Coordinator, Presidio Trust, 34 Graham Street, P.O. Box 29052, San Francisco, CA 94129-0052. Telephone: 415-561-5300.

34 Graham Street, Post Office Box 29052, San Francisco, California 94129-0052
415/561-5300 Fax 561-5315 presidio@presidiotrust.gov



Enclosure 2



April 11, 2000

VIA FACSIMILE AND U.S. MAIL

Johanna Wald
National Resource Defense Council
71 Stevenson Street, Suite 1825
San Francisco, California 94105

Brian Huse
National Parks Conservation Association
P.O. Box 1289
Oakland, California 94604

Dear Ms. Wald and Mr. Huse:

This letter is in response to your revised letter dated March 30, 2000 (the "Letter") submitted on behalf of As You Sow, Golden Gate Audubon Society, National Parks Conservation Association, Natural Resources Defense Council, San Francisco League of Conservation Voters, San Francisco Tomorrow, San Francisco Tree Council, Sierra Club, and the Wilderness Society (collectively, "AYS") as comments on the Final Environmental Impact Statement and Planning Guidelines for New Development and Uses on 23 Acres within the Letterman Complex ("Final EIS").

The Presidio Trust ("Trust") appreciates AYS' acknowledgement of the serious and thoughtful efforts the Trust has made to respond to comments that AYS and others raised on the Draft EIS. Your comments on the Draft EIS were most helpful in assisting us to improve upon the Final EIS, and we wish to acknowledge your important contributions to the Final EIS.

We note that you have requested "re-circulation" of the FEIS (rather than a supplemental EIS) so that the Trust may take additional comment and respond to such comments.¹ The Trust's response to that request and to the other issues raised in your letter follows, with each of the points addressed in more detail below:

- 1) With respect to AYS' request for an extended review period and re-circulation of the Final EIS, the Trust is agreeable to extending the 30-day review period, but declines to re-circulate the Final EIS.
- 2) This letter provides responses to questions you raise concerning the Trust's commitment to comprehensive planning.
- 3) The more specific comments or questions regarding the contents of the Final EIS raised in your Letter will be considered and addressed as appropriate in the Trust's record of decision (ROD) or in a report accompanying the ROD.

¹ Re-circulation does not usually occur after the close of comments on an FEIS 40 CFR §1503.1(b)

34 Graham Street, Post Office Box 29052, San Francisco, California 94129-0052
415/561-5300 Fax 561-5315 presidio@presidiotrust.gov



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Re-circulation of EIS

The Trust agrees that the FEIS reflects improved analysis and some new information. As a result of the improvements that were made in response to public comment, however, your letter concludes that re-circulation of the EIS is required by NEPA. The Trust respectfully disagrees.

The legal standard in 40 C.F.R. § 1502.9(c)(1)(ii) to which your Letter refers is a portion of the standard applicable to determining when a supplemental EIS is required. This standard is inapplicable to the question of whether re-circulation is required under NEPA in this instance.

Under the NEPA regulations, re-circulation is required only "[i]f a draft statement is so inadequate as to preclude meaningful analysis. . . ." 40 C.F.R. § 1502.9(a). The Draft EIS released in April 1999 did not meet this high threshold for re-circulation. Public commentators were able to use the draft to focus comments with specificity, and this is indication enough that the Draft EIS did not preclude but rather provided sufficient analysis to meet the above standard. The Final EIS, as your letter acknowledges, is much improved, in part due to your thoughtful suggestions. The improvements and new information in the Final EIS reflect the very purpose for soliciting public comment in the NEPA process. NEPA's opportunity for public comment and input on the Draft EIS allowed the Trust to be responsive, to provide additional analysis and clarifying information, and generally to make improvements when moving from the Draft to the Final EIS. Whatever inadequacies may have existed in the Draft EIS, if any, they did not in the end prevent meaningful analysis, and therefore no re-circulation is required.

Extended Review Period

The Trust nevertheless wishes to be responsive to the request made by AYS and others for additional time to review the information in the Final EIS. We therefore are notifying you that the Presidio Trust Board will not take any action or make a final decision on this 23-acre Letterman project prior to its regularly scheduled meeting on May 18, 2000. The practical effect of this is to extend the no-action period for another month. The Trust will ensure full public notification of the additional review time available by a direct mailing to parties who received the Final EIS (including those who submitted substantive comments on the Draft EIS) and by posting a notice on its web-site.

The Trust will reach its decision based upon the entire record for the proposed action. Although the no-action period is not a formal comment period, all comments received during this time will be a part of that record and to the extent appropriate and warranted the Trust will respond to such comments in its record of decision (ROD) or in a report accompanying the ROD.

After nearly two years of public process on the Letterman project and in light of the importance of this project to the Presidio's overall financial viability, the additional review period and approach to comments offered during the no-action period is a reasonable accommodation of the interests of parties who are striving toward a common end—the preservation, protection and enhancement of the Presidio.

Comprehensive Planning Commitment

The Trust's announcement of comprehensive planning was made with this common end in mind. Yet AYS states that it perceives the Trust's announcement as intentionally "vague" and inadequate for its lack of "detail." The irony in this is that it illustrates what may have been an overreaction by both the Trust and AYS. In making its announcement, the Trust does not have

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much detail to offer because it wished to avoid even the appearance that it had made decisions on important questions of scope without public involvement. AYS on the other hand is unwilling to accept the Trust's commitment to this process until it is verified through decisiveness and detail.

The concepts summarized below constitute the Trust's current evolution of thought on the topics your Letter raises and are in response to the specific questions posed by AYS in its Letter regarding such planning. These concepts will be honed and clarified as the scoping process unfolds.

- The Trust is fully committed to a planning effort that will encompass all of Area B, will be conducted pursuant to NEPA, and will follow the NEPA procedural requirements. The Trust is not exempt from NEPA, and accordingly the Trust fully intends to follow NEPA's procedural requirements throughout this planning process.
- The GMPA will form the foundation of the planning effort. The Trust does not intend to start from scratch or to repudiate the GMPA. This planning will, however, take into account intervening events that have altered the GMPA's site-specific assumptions, changed circumstances and new opportunities that have arisen since the 1994 GMPA was finalized, and new Trust mandates. The Trust expects the product of the planning effort to be an update of the 1994 GMPA for Area B of the Presidio with an associated supplemental environmental impact statement (SEIS) that is tiered off the 1994 GMPA EIS. For purposes of distinguishing the National Park Service's 1994 GMPA from the Trust's update, the Trust's plan will be known as the Presidio Trust Implementation Plan (PTIP). The PTIP SEIS will look at a range of development alternatives throughout the park. We also anticipate the planning effort to address AYS' call for the Trust to clearly articulate its comprehensive vision for the Presidio.
- The Trust anticipates that it will integrate into this planning effort the components of the comprehensive management program referred to in section 104(c) of the Trust Act.
- With respect to enforceability, a plan is a planning, management, and implementation tool and does not carry the force of law. Nevertheless, the resulting updated plan, once adopted by the Board at the conclusion of the process is anticipated to become the governing plan and policy directive for the Trust for all activities within Area B of the Presidio.
- The Trust estimates a planning effort of up to 18 months with formal scoping anticipated to begin in July/August 2000. We would anticipate meeting with you to discuss preliminary thoughts on the planning process prior to the start of formal scoping.
- The Trust does not intend to bring operations to a halt during the updated planning effort. Rather, the GMPA will continue to serve as the governing comprehensive plan for the Presidio, and the Trust will continue to move forward on actions that are contemplated in the GMPA, or, if they diverge or are not adequately analyzed under the GMPA, will subject such actions as appropriate to further NEPA analysis (e.g., Vegetation Management Plan, Mountain Lake Enhancement, and leasing and other activities). In addition, the Trust will move ahead with an interim leasing program. These interim, temporary, and short term leases are being offered to allow generation of some revenue necessary for operation and maintenance of existing buildings and infrastructure while the planning process proceeds and

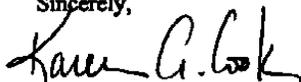
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to provide for interim occupancy of historic structures so as to prevent or mitigate the continued deterioration that results from sustained vacancy.

- To seek decisions or commitments from the Trust at this time concerning tenant selection criteria or numeric goals for any type of tenant overreaches and is premature and inappropriate. Keeping in mind the tenant selection criteria of the Trust Act, the Trust will engage in discussion concerning a range of tenant types and range of tenant selection factors as these issues are identified as relevant to the decision-making during the overall planning process. Several provisions of the Trust Act make the market a relevant decision-making factor in tenant selection. The Trust has never stated, however, that the market is the sole mechanism for finding tenants. These questions of tenant selection criteria will be discussed at an appropriate stage of the planning effort.

Rather than looking back, the Trust's commitment to comprehensive planning is a commitment to look forward to the future of the Presidio. As you know, the Trust does not consider the PTIP SEIS to be one required by law, but we are in complete agreement with you that such planning is good policy at this point in the Presidio's future. The Trust hopes that AYS will be an integral and constructive part of that process and with the Trust will work toward improving our communications so as to promote an atmosphere of mutual trust and respect.

Sincerely,



Karen A. Cook
General Counsel

Enclosure 3



May 16, 2000

Brian Huse
National Parks Conservation Association
P.O. Box 1289
Oakland, California 94604

Johanna Wald
National Resource Defense Council
71 Stevenson Street, Suite 1825
San Francisco, California 94105

Dear Brian and Johanna:

Thank you for your letter of May 3, 2000. The issue of a smaller development project at the Letterman site and the re-circulation of the Final Environmental Impact Statement (FEIS) for the proposed 23-acre Letterman Complex project will be addressed in the report accompanying the Record of Decision. The purpose of this letter is to respond to your questions relating to the Presidio Trust Implementation Plan (PTIP) process.

In your latest letter, you allude to an underlying concern that there is "a fundamental difference between how the Trust and our organizations view the requirement to achieve self-sufficiency." We believe that the PTIP process will provide us with a constructive forum for addressing the financial sufficiency requirements applicable to the Trust. As part of this process, the Trust intends to update the FMP, engage in discussions regarding the Trust's mandate to achieve "financial self-sufficiency", obtain public input regarding alternative levels of development, and evaluate the financial and programmatic consequences of these alternatives. To the extent that your focus will be to have the Trust revise the Financial Management Program "to allow the least amount of development that will permit the financial mandate to be met", this interpretation of financial self-sufficiency can be fully addressed as part of PTIP. We offer this detail as further assurance that the Trust is fully committed to making the Presidio Trust Implementation Plan (PTIP) process comprehensive and meaningful.

As further assurance of the Trust's commitment to make the PTIP process meaningful, we wish to clarify that pending the completion of the PTIP, the Trust intends generally to refrain from entering into new commitments for long-term projects. The Trust instead will focus on interim leasing, both as a revenue source and to minimize further deterioration of historic buildings, and on concluding those projects that already have undergone or are well into the environmental review process.

Through the PTIP process, the Trust seeks to engage the public in a new dialogue to help update the vision and plan for the Presidio that is responsive to the Trust's mandates including, but not limited to, its need to achieve financial self-sufficiency. We intend that this process will make timely and steady progress toward the creation of an updated plan and we believe that the public will be best served by such a process. Toward that end, we wish to extend an invitation to you and the groups on behalf of whom you write to meet informally to discuss these and other preliminary ideas prior to initiation of a formal scoping process. I will contact you next week to discuss how we can best engage your organizations and to discuss a proposed schedule of meetings.

Sincerely,

Karen A. Cook
General Counsel

34 Graham Street, Post Office Box 29052, San Francisco, California 94129-0052
415/561-5300 Fax 561-5315 presidio@presidiotrust.gov



Enclosure 4



May 1, 2000

Mr. Pete Holloran
President
California Native Plant Society
Yerba Buena Chapter
150 Haight Street, #102
San Francisco, CA 94102

Dear Mr. Holloran:

Thank you for your letter of April 3, 2000 to John Pelka, the Presidio Trust's NEPA Compliance Coordinator. As you requested, the Trust will consider the comments contained in the March 30, 2000 letter on behalf of As You Sow and other organizations (the "AYS letter") to represent your organization's comments as well. For that reason, I have enclosed a copy of the Trust's response to the AYS letter.

You separately have raised a concern about the applicability of the National Park Service Organic Act and the Golden Gate National Recreation Area Act to the Presidio Trust. Purely as a legal matter, Congress did not make the NPS Organic Act technically applicable to the Trust. That said, the Trust fully recognizes that the Presidio is and remains part of the GGNRA. In creating the Presidio Trust, Congress directed that the Trust manage the leasing, maintenance, rehabilitation, repair and improvement of property within the Presidio under its administrative jurisdiction in accordance with the purposes of the GGNRA Act. Rather than focus on the technical legal applicability of the GGNRA Act or the NPS Organic Act, the Trust prefers to emphasize its obligation to preserve and protect the Presidio as a national park in accordance with the important principles of park preservation and protection set forth in the GGNRA Act and the NPS Organic Act, and to assure you and others of its commitment to these principles.

As you know, the NPS Organic Act, which established the National Park Service, also sets forth the fundamental purpose of areas under the NPS' jurisdiction, "which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as

34 Graham Street, Post Office Box 29052, San Francisco, California 94129-0052
415/561-5300 Fax 561-5315 presidio@presidiotrust.gov



Mr. Pete Holloran
May 1, 2000
Page 2

will leave them unimpaired for the enjoyment of future generations.” This fundamental purpose underlies and is incorporated in the stated purposes of the GGNRA Act.

Far from having cast these important tenets aside, the Trust’s Board of Directors, in its Resolution 99-11, has affirmed its commitment to adhering to the purposes of the GGNRA Act and has identified those purposes as the following:

1. To preserve the Presidio for public use and enjoyment;
2. To provide for the maintenance of needed recreational open space necessary to urban environment and planning;
3. To provide for recreation and educational opportunities consistent with sound principles of land use planning and management; and
4. To preserve the Golden Gate National Recreation Area, as far as possible, in its natural setting, and protect it from development and uses that would destroy the scenic beauty and natural character of the area.

In addition, the Trust is required to exercise its authorities in accordance with the general objectives of the General Management Plan approved for the Presidio. The Trust’s Board of Directors identified these “general objectives” in its Resolution 99-11 as the following:

1. To preserve and (where appropriate) enhance the historical, cultural, natural, recreational, and scenic resources of the Presidio;
2. To address the needs of Presidio visitors, tenants, and residents for community services such as transportation, water, power, waste management, and public safety (among others) in an environmentally responsible manner, while respecting neighboring communities;
3. To increase open space, consolidate developed space, and provide for appropriate uses of the Presidio, including uses that involve stewardship and sustainability, cross-cultural and international cooperation, community service and restoration, health and scientific discovery, recreation, the arts, education, research, innovation, and/or communication; and

Mr. Pete Holloran
May 1, 2000
Page 3

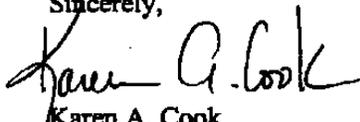
4. To sustain the Presidio indefinitely as a great national park in an urban area.

The Trust's Board of Directors has directed the staff to be guided by the statements in Resolution 99-11 in the Trust's management of the property under its administrative jurisdiction. Through the vehicle of the Trust Act and the Trust's policy directives, the Trust is thus subject to the important park preservation principles embodied in the GGNRA Act and the NPS Organic Act.

In closing, the Trust wishes to acknowledge and express its gratitude for the many hours that you and your organization have dedicated to the preservation of the Presidio. Your efforts, both past and ongoing, and those of other dedicated supporters are crucial as we move forward in the next chapter of this unique and significant place.

Thank you again for your continuing contributions to the Presidio.

Sincerely,


Karen A. Cook
General Counsel



April 11, 2000

VIA FACSIMILE AND U.S. MAIL

Johanna Wald
National Resource Defense Council
71 Stevenson Street, Suite 1825
San Francisco, California 94105

Brian Huse
National Parks Conservation Association
P.O. Box 1289
Oakland, California 94604

Dear Ms. Wald and Mr. Huse:

This letter is in response to your revised letter dated March 30, 2000 (the "Letter") submitted on behalf of As You Sow, Golden Gate Audubon Society, National Parks Conservation Association, Natural Resources Defense Council, San Francisco League of Conservation Voters, San Francisco Tomorrow, San Francisco Tree Council, Sierra Club, and the Wilderness Society (collectively, "AYS") as comments on the Final Environmental Impact Statement and Planning Guidelines for New Development and Uses on 23 Acres within the Letterman Complex ("Final EIS").

The Presidio Trust ("Trust") appreciates AYS' acknowledgement of the serious and thoughtful efforts the Trust has made to respond to comments that AYS and others raised on the Draft EIS. Your comments on the Draft EIS were most helpful in assisting us to improve upon the Final EIS, and we wish to acknowledge your important contributions to the Final EIS.

We note that you have requested "re-circulation" of the FEIS (rather than a supplemental EIS) so that the Trust may take additional comment and respond to such comments.¹ The Trust's response to that request and to the other issues raised in your letter follows, with each of the points addressed in more detail below:

- 1) With respect to AYS' request for an extended review period and re-circulation of the Final EIS, the Trust is agreeable to extending the 30-day review period, but declines to re-circulate the Final EIS.
- 2) This letter provides responses to questions you raise concerning the Trust's commitment to comprehensive planning.
- 3) The more specific comments or questions regarding the contents of the Final EIS raised in your Letter will be considered and addressed as appropriate in the Trust's record of decision (ROD) or in a report accompanying the ROD.

¹ Re-circulation does not usually occur after the close of comments on an FEIS 40 CFR §1503.1(b)

34 Graham Street, Post Office Box 29052, San Francisco, California 94129-0052
415/561-5300 Fax 561-5315 presidio@presidiotrust.gov



Johanna Wald and Brian Huse
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Re-circulation of EIS

The Trust agrees that the FEIS reflects improved analysis and some new information. As a result of the improvements that were made in response to public comment, however, your letter concludes that re-circulation of the EIS is required by NEPA. The Trust respectfully disagrees.

The legal standard in 40 C.F.R. § 1502.9(c)(1)(ii) to which your Letter refers is a portion of the standard applicable to determining when a supplemental EIS is required. This standard is inapplicable to the question of whether re-circulation is required under NEPA in this instance.

Under the NEPA regulations, re-circulation is required only "[I]f a draft statement is so inadequate as to preclude meaningful analysis. . . ." 40 C.F.R. § 1502.9(a). The Draft EIS released in April 1999 did not meet this high threshold for re-circulation. Public commentators were able to use the draft to focus comments with specificity, and this is indication enough that the Draft EIS did not preclude but rather provided sufficient analysis to meet the above standard. The Final EIS, as your letter acknowledges, is much improved, in part due to your thoughtful suggestions. The improvements and new information in the Final EIS reflect the very purpose for soliciting public comment in the NEPA process. NEPA's opportunity for public comment and input on the Draft EIS allowed the Trust to be responsive, to provide additional analysis and clarifying information, and generally to make improvements when moving from the Draft to the Final EIS. Whatever inadequacies may have existed in the Draft EIS, if any, they did not in the end prevent meaningful analysis, and therefore no re-circulation is required.

Extended Review Period

The Trust nevertheless wishes to be responsive to the request made by AYS and others for additional time to review the information in the Final EIS. We therefore are notifying you that the Presidio Trust Board will not take any action or make a final decision on this 23-acre Letterman project prior to its regularly scheduled meeting on May 18, 2000. The practical effect of this is to extend the no-action period for another month. The Trust will ensure full public notification of the additional review time available by a direct mailing to parties who received the Final EIS (including those who submitted substantive comments on the Draft EIS) and by posting a notice on its web-site.

The Trust will reach its decision based upon the entire record for the proposed action. Although the no-action period is not a formal comment period, all comments received during this time will be a part of that record and to the extent appropriate and warranted the Trust will respond to such comments in its record of decision (ROD) or in a report accompanying the ROD.

After nearly two years of public process on the Letterman project and in light of the importance of this project to the Presidio's overall financial viability, the additional review period and approach to comments offered during the no-action period is a reasonable accommodation of the interests of parties who are striving toward a common end—the preservation, protection and enhancement of the Presidio.

Comprehensive Planning Commitment

The Trust's announcement of comprehensive planning was made with this common end in mind. Yet AYS states that it perceives the Trust's announcement as intentionally "vague" and inadequate for its lack of "detail." The irony in this is that it illustrates what may have been an overreaction by both the Trust and AYS. In making its announcement, the Trust does not have

Johanna Wald and Brian Huse
April 11, 2000
Page 3

much detail to offer because it wished to avoid even the appearance that it had made decisions on important questions of scope without public involvement. AYS on the other hand is unwilling to accept the Trust's commitment to this process until it is verified through decisiveness and detail.

The concepts summarized below constitute the Trust's current evolution of thought on the topics your Letter raises and are in response to the specific questions posed by AYS in its Letter regarding such planning. These concepts will be honed and clarified as the scoping process unfolds.

- The Trust is fully committed to a planning effort that will encompass all of Area B, will be conducted pursuant to NEPA, and will follow the NEPA procedural requirements. The Trust is not exempt from NEPA, and accordingly the Trust fully intends to follow NEPA's procedural requirements throughout this planning process.
- The GMPA will form the foundation of the planning effort. The Trust does not intend to start from scratch or to repudiate the GMPA. This planning will, however, take into account intervening events that have altered the GMPA's site-specific assumptions, changed circumstances and new opportunities that have arisen since the 1994 GMPA was finalized, and new Trust mandates. The Trust expects the product of the planning effort to be an update of the 1994 GMPA for Area B of the Presidio with an associated supplemental environmental impact statement (SEIS) that is tiered off the 1994 GMPA EIS. For purposes of distinguishing the National Park Service's 1994 GMPA from the Trust's update, the Trust's plan will be known as the Presidio Trust Implementation Plan (PTIP). The PTIP SEIS will look at a range of development alternatives throughout the park. We also anticipate the planning effort to address AYS' call for the Trust to clearly articulate its comprehensive vision for the Presidio.
- The Trust anticipates that it will integrate into this planning effort the components of the comprehensive management program referred to in section 104(c) of the Trust Act.
- With respect to enforceability, a plan is a planning, management, and implementation tool and does not carry the force of law. Nevertheless, the resulting updated plan, once adopted by the Board at the conclusion of the process is anticipated to become the governing plan and policy directive for the Trust for all activities within Area B of the Presidio.
- The Trust estimates a planning effort of up to 18 months with formal scoping anticipated to begin in July/August 2000. We would anticipate meeting with you to discuss preliminary thoughts on the planning process prior to the start of formal scoping.
- The Trust does not intend to bring operations to a halt during the updated planning effort. Rather, the GMPA will continue to serve as the governing comprehensive plan for the Presidio, and the Trust will continue to move forward on actions that are contemplated in the GMPA, or, if they diverge or are not adequately analyzed under the GMPA, will subject such actions as appropriate to further NEPA analysis (e.g., Vegetation Management Plan, Mountain Lake Enhancement, and leasing and other activities). In addition, the Trust will move ahead with an interim leasing program. These interim, temporary, and short term leases are being offered to allow generation of some revenue necessary for operation and maintenance of existing buildings and infrastructure while the planning process proceeds and

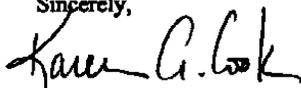
Johanna Wald and Brian Huse
April 11, 2000
Page 4

to provide for interim occupancy of historic structures so as to prevent or mitigate the continued deterioration that results from sustained vacancy.

- To seek decisions or commitments from the Trust at this time concerning tenant selection criteria or numeric goals for any type of tenant overreaches and is premature and inappropriate. Keeping in mind the tenant selection criteria of the Trust Act, the Trust will engage in discussion concerning a range of tenant types and range of tenant selection factors as these issues are identified as relevant to the decision-making during the overall planning process. Several provisions of the Trust Act make the market a relevant decision-making factor in tenant selection. The Trust has never stated, however, that the market is the sole mechanism for finding tenants. These questions of tenant selection criteria will be discussed at an appropriate stage of the planning effort.

Rather than looking back, the Trust's commitment to comprehensive planning is a commitment to look forward to the future of the Presidio. As you know, the Trust does not consider the PTIP SEIS to be one required by law, but we are in complete agreement with you that such planning is good policy at this point in the Presidio's future. The Trust hopes that AYS will be an integral and constructive part of that process and with the Trust will work toward improving our communications so as to promote an atmosphere of mutual trust and respect.

Sincerely,



Karen A. Cook
General Counsel

Enclosure 5



May 11, 2000

Mr. Harry Y. Yahata
 District Director
 California Department of Transportation
 District 4
 PO Box 23660
 Oakland, CA 94623 – 0660

Attn: Jean Finney, District Branch Chief, IGR/CEQA

Subject: FEIS and Planning Guidelines for the Letterman Complex

Dear Mr. Yahata:

Thank you for your April 5 letter relaying Caltrans' comments on the Final Environmental Impact Statement (FEIS) for the Letterman Complex. The Presidio Trust would like to ensure that our two agencies have designed a process that will address Caltrans' concerns expeditiously and completely. We thought we had addressed your specific concerns in our response to comments in the Final EIS, but from your letter it seems you were looking for something more. Toward that end, since receiving your letter, the Trust has been in more regular contact and will continue this approach to ensure the ongoing cooperation of Caltrans on the Letterman project. With this commitment to more fully address Caltrans' issues, the Trust looks forward to a continued joint effort in implementing the project-related Richardson Avenue intersection improvements identified in the FEIS.

Your letter referred to issues previously raised in your June 7, 1999 letter commenting on the DEIS. Those concerns related to capacity and queuing at the proposed new intersections on Richardson Avenue (Highway 101) in the vicinity of the Letterman complex. The Trust set out its initial response and approach to these subjects in Response to Comment Letter 11 on page 106, and in Master Response 18, on page 43 of the Response to Comments volume of the FEIS. Master Response 18 provided capacity information and estimates of queuing distances, assuming that the Trust would prepare a combined Project Study Report and Project Report, in which detailed design issues and alternatives would be fully analyzed.

Since receiving your comment letter on the FEIS, the Trust has made a concerted effort to expedite the process that was presented in the FEIS response to comments. As recommended in your April 5 letter, Trust staff and consultants met with Caltrans design, traffic operations and environmental staff at District 4 Headquarters on April 13, 2000.

54 Graham Street, Post Office Box 29052, San Francisco, California 94129-0052
 415/561-5300 Fax 561-5315 presidio@presidiotrust.gov



To respond to Caltrans' issues, we accelerated the analysis anticipated to occur later in the PSR/PR process by directing our consultants, Wilbur Smith Associates, to immediately begin collecting additional field data and analyze traffic operations related to the intersections. A technical memorandum outlining their findings is attached. The Trust also held a meeting with Caltrans traffic operations staff on May 2 to discuss the findings of the report.

Caltrans primary concerns, as we understand them, can be categorized as follows:

- A need to maintain current lane capacity through the intersections
- A need to keep southbound traffic from backing up from the new intersections to the "gore" where the ramp from Doyle Drive splits into two branches going to either Richardson Avenue or Marina Boulevard.
- The safety of vehicles as they enter the back of the southbound queue behind the two intersections.

These concerns are addressed below:

Lane capacity: The FEIS indicates, and the Trust will ensure as we proceed through the design process, that future intersections will maintain the current three through lanes in either direction. The EIS traffic analysis for the intersections considers the three lanes (Appendix A of the *Presidio Letterman Complex Transportation Technical Report*, February 28, 2000.).

Queuing onto Doyle Drive: Analysis in the attached memorandum, based on both field observations and use of the Synchro traffic model indicates an average queue of 480 feet and a maximum queue of 850 feet in the critical southbound peak hour of 7:30-8:30AM. The distance between the westernmost proposed intersection and the "gore" beginning the Doyle Drive mainline is 1,475 feet – considerably greater than the maximum queue – so under normal (non-incident) conditions, the mainline will not be impacted.

Safety of southbound vehicles entering the back of the queue: Even though the queue does not extend to the mainline, it will extend on occasion to the ramp from Doyle to Richardson Avenue, leading to concern about adequate stopping sight distance on the curved section of the ramp. This is an issue that will be resolved in PSR/PR development but, as suggested, we have addressed it early in the process.

As Figures 2 and 3 in the attached memorandum show, queues behind the proposed western intersection will typically extend onto the curved ramp during the AM peak hour. However, the stopping sight distance problem is improved considerably if stops at that intersection are eliminated in the AM peak. Figure 3 shows that the required stopping sight distance for the average queue is on the roadway tangent while Figure 4 indicates that the required stopping sight distance for the maximum queue extends slightly onto the curved ramp.

A two-intersection solution was suggested in the FEIS because a three-phase signal including left turns from the Presidio to Richardson Avenue westbound could not be

accommodated in the AM peak hour due to the high volume of eastbound through traffic. The memorandum suggests two other possible solutions leading toward a single intersection in the AM peak period:

- Close the western intersection in the AM period and put the signal on yellow flashing, or
- Redesign the eastern intersection to allow left turns onto Richardson Avenue, but prohibit those turns in the AM peak.

Both of these options will be studied in development of the PSR/PR. In addition, we will examine the possibility of moving the primary intersection somewhat further east while ensuring sufficient length to accommodate northbound left turns into the Letterman Complex. As a further safety measure, our consultants propose a number of warning signs that will further alert motorists to the fact that the freeway is ending and that a signal is ahead.

We are confident that these combinations of changes will provide a satisfactory resolution of Caltrans' concerns. These proposed changes will be discussed in the initial meeting of the Project Development Team meeting to be held at the Presidio Trust on May 17.

Along with the technical and community involvement efforts involved in preparing the PSR/PR, the Trust will work with Caltrans to prepare a draft Cooperative Agreement for final design and construction. Although we understand that this agreement cannot be finalized until approval of the PSR/PR, we expect to have a draft document in place in the next few months so that a final agreement can be prepared as soon as possible after approval of the PSR/PR.

We look forward to continuation of our cooperative working relationship with your staff in bringing this project to a successful conclusion.

Sincerely,



Jane Blackstone
Deputy Director for Planning

Enclosure

cc: Keyhan Moghbel, Caltrans
Rod Oto, Caltrans
Jerry Robbins, CCSF
Richard Tilles, Presidio Trust
Luba Wyznyckyji, Wilbur Smith Associates
Lois Stevens, Parsons Transportation Group



MEMORANDUM

San Francisco Office
May 2, 2000

Project Number: 339070

To: Dick Tilles, The Presidio Trust

From: Luba C. Wyznycky/Amy R. Marshall

Subject: Southbound Queue on Richardson Avenue during the Morning Commute Period

In response to Caltrans concerns about the traffic operation and safety impacts of the proposed new intersections on Richardson Avenue, the following additional analyses were conducted:

1. Field surveys of existing conditions
2. Review of traffic operations analysis using the Synchro software
3. Review of alternative operations and appropriate warning devices

Field Surveys of Existing Conditions

Field surveys of southbound traffic operations on Richardson Avenue were conducted on Tuesday, April 25 and Thursday, April 27, 2000. Surveys were conducted during the AM peak hour of 7:30 to 8:30 AM, as this time reflects the highest traffic volumes and greatest queues at the approach to the traffic signal at Lyon Street/Francisco Street. During the AM peak hour southbound traffic volumes approaching the signal are about 3,290 vehicles per hour (vph).

The maximum queue length was recorded for each signal cycle during the peak hour. The maximum queue occurs shortly after the signal turns green when additional vehicles are added to the end of the queue. The field surveys indicated that the greatest queue occurred in the middle traffic lane, with the left-most lane (the lane adjacent to the median) containing the shortest queue.

The field survey indicates that the southbound queue does not extend beyond the southeastern edge of the second YMCA building (Building 1152) for 80 percent of the peak hour signal cycles. The average peak hour queue length is 485 feet, and the maximum queue length is 860 feet. The median observed queue length was 450 feet. Figure 1 depicts the average and maximum queue length on Richardson Avenue during the morning peak commute hour.

Dick Tilles, Presidio Trust
May 2, 2000
Page 2

Review of Synchro Calculations

The traffic operations analysis in the *Letterman Complex EIS/EIR Responses to Comments* was conducted using the Synchro software as it considers the operation of multiple signals in close proximity as a system, rather than as isolated intersections. Synchro also provides an estimation of queue length.

In order to calibrate Synchro traffic operations analysis with field survey results, adjustments to the lane utilization factor were made so that the Synchro model would reflect the field-observed average and maximum queues. This validated condition was used to analyze the effect of additional vehicles due to background growth and traffic associated with the Letterman Complex (an increase of about 480 vph for a total of 3,770 vehicles approaching the new intersection during the AM peak hour).

Additional traffic operational analysis of the two intersections assumes coordinated signal timing. The current 90-second cycle length was maintained; however, the split was modified to reflect the new northbound left turn into the Presidio at the new eastern intersection, reduced pedestrian crossing time resulting from a shorter perpendicular crossing, the increase in southbound traffic volumes, and the elimination of through traffic crossing Richardson Avenue. The green time for the southbound approach was increased from 60 seconds to 65 seconds.

Results of the analysis indicate an average queue length of 480 feet and a maximum queue length of 850 feet. The queues are illustrated on the attached figures and described below.

Review of operations and appropriate warning devices

Figure 1 depicts the average and maximum queue at the current intersection for existing traffic conditions. Figures 2 and 3 depict the average and maximum queue lengths at the intersections proposed in the EIS/EIR for future traffic conditions (as described above). These figures also indicate the stopping sight distance required for a travel speed of 45 mph, or 360 feet (the speed limit is 45 mph on Doyle Drive upstream of the diverge, with 40 mph posted on the end of the curve on Richardson Avenue).

Conclusions

Neither average nor maximum queues (plus the required stopping sight distance) back up past the diverge between Doyle Drive and Richardson Avenue. Therefore the new signal would not impact traffic on mainline Doyle Drive or traffic destined for Marina Boulevard. Depending on the actual length of the queue, there would be between 265 and 645 feet from the end of the queue to the diverge.

Stopping sight distance is an issue since the queue will occasionally extend along the ramp from Doyle Drive to Richardson Avenue. The ramp has three 10-foot lanes, no shoulders, a 9-inch offset to the face of the barrier, and a fairly high barrier which limits sight distance. Therefore, we propose that a number of options be analyzed in the Project Study Report to address the stopping sight distance concerns:

Dick Tilles, Presidio Trust
May 2, 2000
Page 3

1. Only use the northernmost intersection during the PM period when it is needed to accommodate vehicles exiting the Letterman Complex. The proposed new intersecting street functions strictly as a local Presidio road and would be easy to close when not required, or do not build the intersection at all and simply not allow left-turns from the single southern intersection during the AM peak period when southbound queues are an issue. Figures 4 and 5 depict average and maximum queues at the single eastern intersection.

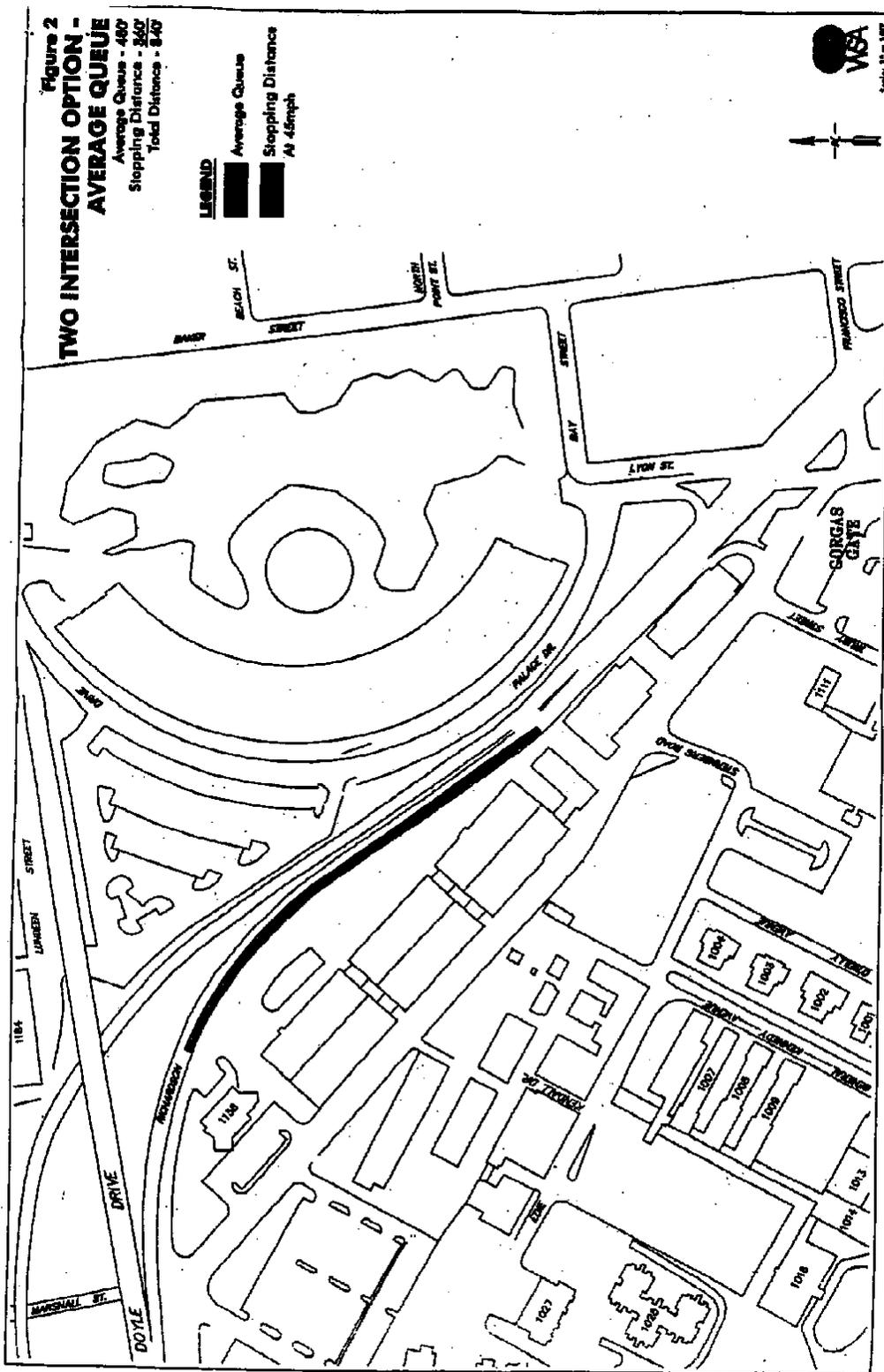
During the PM peak hour, queues would be much shorter and could allow for egress from the Presidio. Closure of the western intersection would provide southbound drivers additional stopping distance.

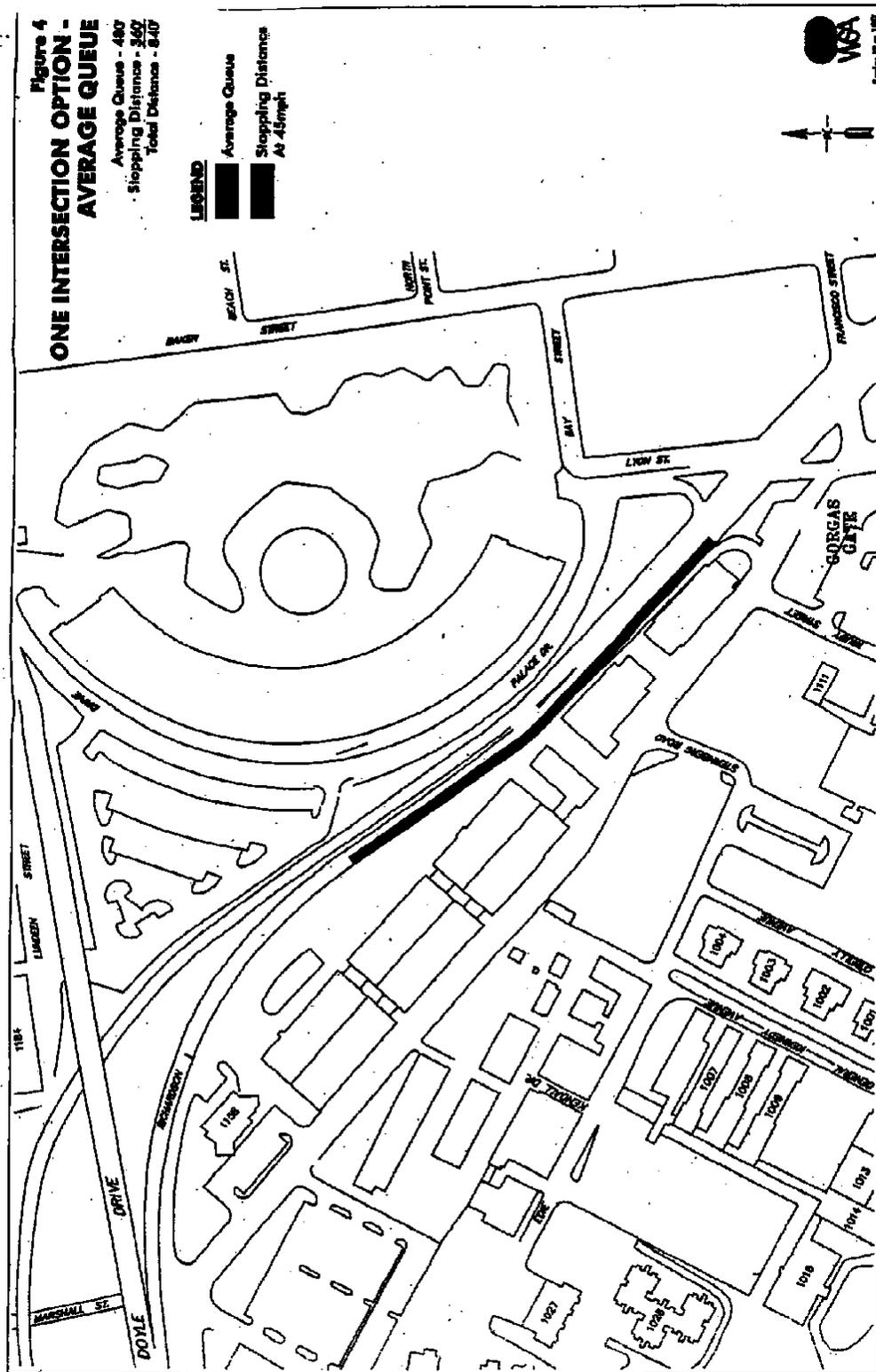
3. Post a reduced speed limit. The speed limit for southbound vehicles on the curve connecting Doyle Drive to Richardson Avenue is currently 45 mph and is reduced to 40 mph at the end of the 750-foot radius curve on Richardson Avenue. The speed limit on Doyle Drive east of the Doyle Drive/Richardson Avenue diverge (approaching Marina Boulevard) is posted as 35 mph with about 1,300 feet prior to the signal at Marina Boulevard. Posting a similar speed limit of 35 mph or even 40 mph would encourage drivers to slow down as they approach Richardson Avenue. Southbound vehicles traveling at 35 or 40 mph would require a shorter stopping sight distance.

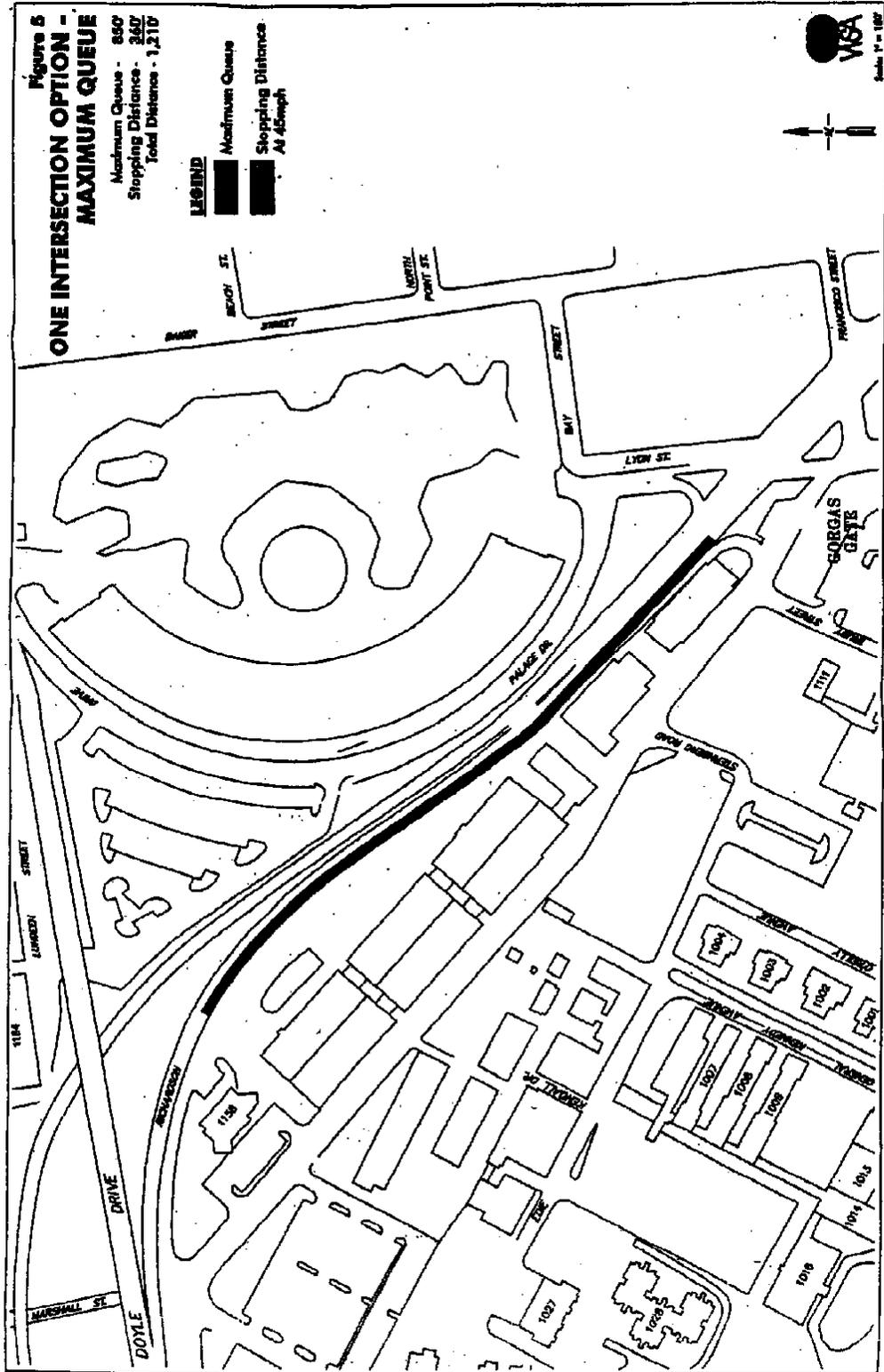
Post a "SIGNAL AHEAD" sign (Signs W41 and W41A in *Caltrans Traffic Manual*). Other Caltrans signage plans indicate that this warning sign should be placed at the divergence gore.

Post an "End of Freeway" sign similar to those on I-280 approaching King Street off-ramp: "End of Freeway ½ mile" (Sign W69 in *Caltrans Traffic Manual*), "End of Freeway ¼ mile", SPECIAL TURN/TURN ARROW AND ADVISORY SPEED sign (Sign W4 in *Caltrans Traffic Manual*), and "SIGNAL AHEAD" sign with flashers.

4. Move the new intersection further south, ensuring that the left-turn queue from Richardson Avenue to the Letterman Complex is accommodated (assumes one intersection plan).







Enclosure 6

STATE OF CALIFORNIA - BUSINESS, TRANSPORTATION AND HOUSING AGENCY

GRAY DAVIS, Governor

DEPARTMENT OF TRANSPORTATION

P O BOX 23880
OAKLAND, CA 94623-0880
Tel: (510) 286-4444
Fax: (510) 286-5513
TDD (510) 286-4454

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May 16, 2000

SF-101-6.71
File No. SF101102

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

Final Environmental Impact Statement (FEIS) and Planning Guidelines for the Letterman Complex; The Presidio Trust; City and County of San Francisco

Thank you for your letter dated May 11, 2000, sent in response to Caltrans' comments on the Letterman Complex FEIS transmitted to the Presidio Trust ("the Trust") on April 5, 2000. Your letter outlined our primary concerns regarding the safety and operational impacts of the improvements proposed for the U.S. 101/Richardson Avenue. With regard to the need to maintain current capacity through the intersections, please note that this includes both maintaining the current number of through lanes and the peak flows along Richardson Avenue.

After meeting with the Presidio Trust staff to discuss our concerns on April 13, and again on May 2, 2000, it is evident to us that the Trust is committed to resolving these issues. We are optimistic that with continued cooperation between Caltrans and the Trust, we will be able to work out a mutually agreeable solution to the difficult challenge of improving access to the Letterman Complex while maintaining acceptable levels of operation on Richardson Avenue.

Thank you for the opportunity to work with you on this project. Should you require further information or have any questions regarding this letter, please call Nandini N. Shridhar, AICP, of my staff at (510) 622-1642.

Sincerely,

HARRY Y. YAHATA
District Director

By *Jean C. R. Finney*

JEAN C. R. FINNEY
District Branch Chief
IGR/CEQA



Enclosure 7



May 17, 2000

Mr. Drummond Pike
Tides Foundation
P.O. Box 29903
San Francisco, CA 94129

Dear Mr. Pike:

Thank you for your May 8, 2000 letter. We appreciate your acknowledgement of the effort that the Trust has made to respond both to your comments to the draft Environmental Impact Statement (EIS) for the proposed 23-acre Letterman Complex and to public requests for additional time to review the final EIS (FEIS).

The Trust understands and wishes to be responsive to your request that the Trust demonstrate its commitment to the comprehensive planning process that was announced in the Letterman FEIS. The Trust believes this public process will be the proper forum for addressing the specific "commitments" that you reference in your letter. At this point, even before the planning process has begun, the Trust is not in a position to make the very specific substantive promises that you seek related to modifications of specific policies or of the General Objectives. What the Trust can do appropriately at this early stage is to offer for your information some of the Trust's early thoughts on both the substance and the process of the comprehensive planning effort as an indication that the process will be both comprehensive and meaningful.

The Trust is fully committed to additional comprehensive planning that will encompass Area B of the Presidio and that will be conducted pursuant to the procedural requirements of the National Environmental Policy Act (NEPA). The GMPA will form the foundation of the Trust's update, which the Trust terms the Presidio Trust Implementation Plan (PTIP). This update to the GMPA will take into account intervening events that have altered the GMPA's site-specific assumptions, changed circumstances and new opportunities that have arisen since the 1994 GMPA was finalized, and new Trust mandates. The PTIP environmental impact statement (EIS) will look at a range of development alternatives for the Presidio, and the PTIP process will address your call for the Trust to clearly articulate its comprehensive vision for the Presidio.

Your letter requests additional financial disclosure. As part of the PTIP process, the Trust intends to update its Financial Management Program and intends for that process to include public discussions regarding the Trust's mandate to achieve "financial self-sufficiency", to obtain public input regarding alternative levels of development, and to evaluate the financial and programmatic consequences of these alternatives. Please note that the financial reports referenced in your letter, namely BAE 1998b, Concord Group 1998 and Mancini Mills 1998a and 1998b are all available in the library at the Presidio Trust's office. The GAO 2000 report will be a public document, however it is just getting underway.

34 Graham Street, Post Office Box 29052, San Francisco, California 94129-0052
415/561-5300 Fax 561-5315 presidio@presidiotrust.gov



Mr. Drummond Pike
May 17, 2000
Page 2

As further assurance of the Trust's commitment, the Trust intends generally to refrain from entering into new commitments for long-term projects pending the completion of PTIP. The Trust will instead focus on interim leasing both as a revenue source and to minimize further deterioration of historic buildings.

Through the PTIP process, the Trust seeks to engage the public in a dialogue that will help update the vision and plan for the Presidio in such a way as to be responsive to new opportunities, changed circumstances and the changed mandates of the Trust. Toward that end, we look forward to the opportunity to meet informally with representatives of your organization to discuss these and other preliminary ideas prior to the formal initiation of the planning process.

Sincerely,


Karen A. Cook
General Counsel