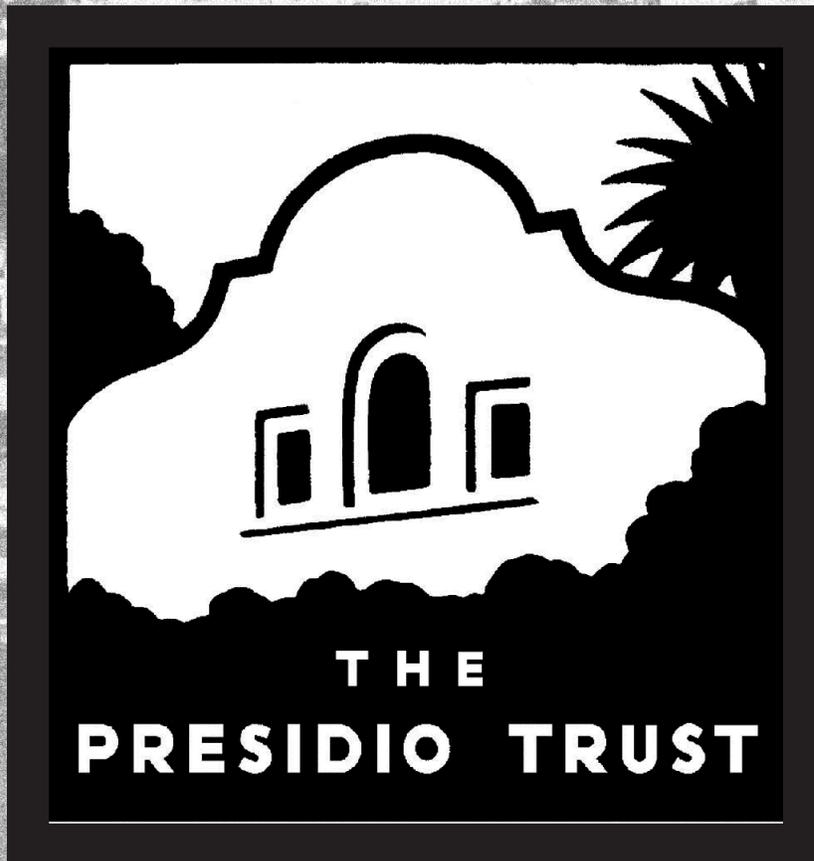


**RESPONSES TO COMMENTS**  
**FINAL ENVIRONMENTAL IMPACT**  
**STATEMENT AND**  
**PLANNING GUIDELINES**



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FOR NEW DEVELOPMENT AND USES ON 23 ACRES WITHIN

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**THE LETTERMAN COMPLEX**

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PRESIDIO OF SAN FRANCISCO  
MARCH 2000



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

***Responses to Comments  
Final Environmental Impact Statement and Planning Guidelines for  
New Development and Uses on 23 Acres within the Letterman Complex/  
A Supplement to the 1994 General Management Plan Amendment  
Environmental Impact Statement for the Presidio***

***Presidio of San Francisco, San Francisco, California***

This document includes all of the substantive comments received through letters and public hearings following the release of the Draft Environmental Impact Statement (EIS) and Planning Guidelines for New Development and Uses within the Letterman Complex in April 1999, and responses to the comments. This document, together with new analysis, information, and changes made in response to comments as reflected in the accompanying revised Draft EIS, will be filed as the Final EIS. The Final EIS is a supplement to the 1994 General Management Plan Amendment (GMPA) EIS, which itself analyzed the future of the Letterman Complex.

The Presidio Trust released for public review and comment the Draft EIS on April 19, 1999. Notice of the availability of the Draft EIS was provided in the Federal Register on April 27, 1999 (64 Fed. Reg. 22662-63) and local news media, and through direct mailing, flyers to owners and occupants of nearby property, posting on the Presidio Trust's website ([www.presidiotrust.gov](http://www.presidiotrust.gov)) and an update in the *Presidio Post*, the monthly publication of the Presidio Trust. The dates of public hearings were included within the notice of availability and within each copy of the Draft EIS. Approximately 325 copies of the Draft EIS were distributed to government agencies, public interest groups, and individuals. The Draft EIS was also made available for review at the Presidio Trust library, park headquarters, local libraries, the Presidio's visitor center, and on the Presidio Trust's website. Additional documents were also released to accompany the Draft EIS, including the GMPA and GMPA EIS (NPS 1994a) and the *Letterman Complex Transportation Technical Report* (Wilbur Smith Associates 1999).

The Presidio Trust announced the release and presented the Draft EIS at a formal Golden Gate National Recreation Area (GGNRA) Citizens Advisory Commission meeting on April 20, 1999, and again the following evening in a Presidio Trust public workshop. At both these meetings, the public was encouraged to submit written or oral comments on the Draft EIS through upcoming public meetings. A summary highlighting the major conclusions of the Draft EIS was widely distributed and posted on the Presidio Trust's website. Three formal GGNRA Citizens Advisory Commission meetings were held on May 18, 1999, June 15, 1999, and July 20, 1999, where public comments on the Draft EIS were received and officially transcribed. In addition, the Presidio Trust held a number of informal meetings with various government agencies and organized interest groups to provide an opportunity to ask questions. The public comment period established by the U.S. Environmental Protection Agency for the Draft EIS commenced on April 23, 1999 and was originally intended to expire on June 26, 1999. On June 18, 1999, as noticed in the Federal Register (64 Fed. Reg. 32899-32900) and through direct mailing to 735 individuals and organizations, the Presidio Trust identified a Digital Arts Center as its preferred alternative and elected to extend the public comment period and accept written comments through August 2, 1999.



By the close of the public comment period, the Presidio Trust received a total of 52 written comment letters on the Draft EIS, including an electronic form letter submitted separately by 100 individuals. The GGNRA Citizens Advisory Committee, on behalf of the Presidio Trust, also heard 40 oral testimonies by 35 individuals, 16 of whom also submitted written comment letters. In addition, 11 comment letters were submitted after the expiration of the public comment period. While the Presidio Trust is not obligated to respond to these letters, in the interest of facilitating full agency and public involvement, the Presidio Trust has chosen to evaluate the substance of these letters and respond as appropriate. All letters received prior to and after the close of the comment period and summary minutes from the three formal meetings are reprinted in this document.

The letters received by the Presidio Trust contain a variety of comments on the Draft EIS. The comments included concerns on such issues as the NEPA process; consistency with the GMPA; compliance with the Planning Guidelines; demonstration of the financial need for the project; impacts on future decision-making, the larger 60-acre complex and other areas of the park; effects on the visitor experience and public use of the Presidio; the appropriateness of the scale of development; and impacts on the adjacent neighborhood, including parking and traffic.

The Presidio Trust has responded to all substantive public comments according to the requirements of 40 CFR 1503. Some comments called for clarification of information in the Draft EIS and Planning Guidelines. Other comments required text modifications, which have been made in the Final EIS and Planning Guidelines and are identified in the Presidio Trust's responses. No responses are provided to comments that merely expressed opinions and did not identify a question or a needed text clarification, correction, or modification. Although responses are not required on comments that simply expressed support for the Presidio Trust's preferred alternative or for one of the other alternatives, all comments have been taken into account in preparing the Final EIS, and will be considered by the agency in reaching its final decision.

The letters in this document are organized by date of receipt (for ease of reference, a list of public agency and commenting organizations is provided at the end of the table of contents). Each letter has been assigned a number (letter 1, for example), with each substantive comment per letter assigned a corresponding additional number (comment 1-1, comment 1-2, and so forth). Responses immediately follow each comment letter. When an issue is addressed by another response, that response has been cross-referenced to eliminate repetition. In order to make the document more reader-friendly, a number of identical or very similar comments have been summarized in a master list which appears at the beginning of the document and a single detailed answer encompassing these comments has been prepared. The numbers in brackets that follow each master response refer to the comments that raise the issue addressed.



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T A B L E O F C O N T E N T S

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I. MASTER RESPONSES

|     |   |    |
|-----|---|----|
| 1A  | The Presidio Trust's Compliance with Applicable Laws                            | 1  |
| 1B  | The Presidio Trust's Compliance with NEPA Generally                             | 3  |
| 1C  | The Presidio Trust's Compliance with Other Statutes                             | 3  |
| 1D  | NEPA and Tiering from the GMPA EIS  | 4  |
| 1E  | Adequacy of Public Involvement Opportunities                                    | 6  |
| 1F  | Preference for NPS Process  | 7  |
| 2A  | Conformity of Trust's Decisions with the GMPA                                   | 7  |
| 2B  | Amending the GMPA   | 11 |
| 3A  | General Objectives Identified and Adopted by the Trust                          | 11 |
| 3B  | Consistency of Trust's Proposed Actions with the General Objectives of the GMPA | 14 |
| 3C  | Process to Identify the General Objectives                                      | 14 |
| 4A  | Need for a Comprehensive Planning Document                                      | 15 |
| 4B  | Adequacy of Cumulative Effects Analysis   | 17 |
| 5   | Availability of Trust's Financial Plan and Assumptions                          | 19 |
| 6A  | Adequacy of Scope of Alternatives   | 20 |
| 6B  | Perception of Pre-Selection by the Trust  | 23 |
| 7A  | Consistency with Planning Guidelines  | 25 |
| 7B  | Design Review and Future Public Involvement                                     | 27 |
| 8   | Precedential Effect of the Letterman Project                                    | 28 |
| 9A  | Conflicts of Interest   | 28 |
| 9B  | Improper Influence  | 29 |
| 10A | Financial Need for the Project  | 29 |
| 10B | Effect of Reducing or Eliminating Revenue from the Letterman Project            | 33 |
| 11  | Derivation of Proposed Building Area  | 34 |
| 12  | Reliance on Mitigation Measures   | 36 |
| 13  | Impact on Water Supply  | 37 |
| 14  | Impact of Increased Sewage Flows  | 38 |
| 15  | Impact on Drainage, Watershed, and Water Quality                                | 38 |
| 16  | Impact on Natural Resources   | 40 |
| 17  | Impact on Quality of Life of Neighbors  | 42 |
| 18  | New Direct Access to the Letterman Complex from Richardson Avenue               | 43 |
| 19  | Impact of Transportation Demand Management on Traffic Volumes                   | 45 |
| 20  | Vehicle Parking on the Site   | 48 |
| 21  | Decision to Develop before Doyle Drive  | 49 |
| 22  | Effect on Existing Intersections, Traffic Circulation, and Historic Roads       | 49 |
| 23  | Effect on Historic Setting  | 50 |
| 24  | Impact on Visual Resources  | 52 |
| 25  | Impact on Visitor Experience and Public Access                                  | 53 |

---

II. LETTERS

|    |  |    |
|----|--|----|
| 1. | JUD Consultants  | 57 |
| 2. | Presidio Village   | 64 |
| 3. | Cow Hollow Neighbors in Action   | 70 |
| 4. | Neighborhood Associations for Presidio Planning  | 76 |
| 5. | Minutes of the Golden Gate National Recreation Area Citizens Advisory Commission Meeting, May 18, 1999 | 78 |
| 6. | Marianne Cavalier  | 86 |



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T A B L E O F C O N T E N T S

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|     |  |     |
|-----|--|-----|
| 7.  | National Audubon Society, Golden Gate Chapter * National Parks And Conservation Association * National Trust for Historic Preservation * Natural Resources Defense Council * San Francisco League of Conservation Voters * The Wilderness Society * Yerba Buena Chapter, California Native Plant Society                         | 88  |
| 8.  | Sierra Club  | 91  |
| 9.  | University of California, Berkeley, Archeological Research Facility  | 94  |
| 10. | Richard T. Hansen  | 96  |
| 11. | California Department of Transportation  | 104 |
| 12. | Golden Gate Bridge, Highway and Transportation District  | 107 |
| 13. | Thoreau Center Partners, L.P.  | 115 |
| 14. | Minutes of the Golden Gate National Recreation Area Citizens Advisory Commission Meeting, June 15, 1999  | 125 |
| 15. | Cow Hollow Association   | 131 |
| 16. | Richard Casey  | 134 |
| 17. | The Sweetheart Arts Company, Inc.  | 136 |
| 18. | National Parks and Conservation Association <sup>1</sup>   | 139 |
| 19. | Gregory D. Specter (also Submitted by Katherine R. Stepan, Jennifer Best and Holly Gressley)   | 142 |
| 20. | Minutes of the Golden Gate National Recreation Area Citizens Advisory Commission Meeting, July 20, 1999  | 145 |
| 21. | Donald R. Beier  | 150 |
| 22. | San Francisco Bicycle Advisory Committee   | 160 |
| 23. | Preserve the Presidio Campaign   | 163 |
| 24. | Sally Small  | 183 |
| 25. | Shared Living Resource Center, Inc.  | 186 |
| 26. | Ken Fitch  | 189 |
| 27. | Valerie S. Iwata   | 191 |
| 28. | Muwekma Ohlone Tribe   | 195 |
| 29. | SGI  | 200 |
| 30. | The Saul Zaentz Company  | 203 |
| 31. | Visual Effects Society   | 205 |
| 32. | Cow Hollow Neighbors in Action/Marina-Cow Hollow Neighbors and Merchants   | 208 |
| 33. | Fort Point and Presidio Historical Association   | 214 |
| 34. | North Bay Council  | 224 |
| 35. | Rocky Mountain Institute   | 227 |
| 36. | Planning Department – City and County of San Francisco   | 234 |
| 37. | American Zoetrope  | 247 |
| 38. | Adriana Paasche Dakin  | 249 |
| 39. | San Francisco County Transportation Authority  | 251 |
| 40. | San Francisco Tree Council   | 254 |
| 41. | Letterman Digital Arts Ltd.  | 256 |
| 42. | San Francisco Film Centre  | 263 |
| 43. | San Francisco Unified School District  | 265 |
| 44. | As You Sow * Ecology Center * Golden Gate Audubon Society * National Trust for Historic Preservation * National Parks and Conservation Association * Natural Resources Defense Council * San Francisco League of Conservation Voters * San Francisco Tomorrow * San Francisco Tree Council, Sierra Club * The Wilderness Society | 267 |
| 45. | James Osborn   | 305 |
| 46. | Sierra Club – Presidio Committee   | 307 |

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<sup>1</sup> The National Parks and Conservation Association posted an electronic form letter on its webpage which was sent by 100 individuals. The list of individuals who submitted the letter appears immediately following the master responses (page 55). All sent letters are available for review at the Presidio Trust.



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T A B L E   O F   C O N T E N T S

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|     |   |     |
|-----|---|-----|
| 47. | Tides Foundation/The Tides Center   | 316 |
| 48. | Urban Watershed Project   | 328 |
| 49. | Western Office – National Trust for Historic Preservation   | 332 |
| 50. | Wild Brain  | 338 |
| 51. | Film Institute of Northern California   | 340 |
| 52. | San Francisco Film Society  | 342 |
| 53. | Sierra Club Loma Prieta Chapter   | 344 |
| 54. | Bryan Foster  | 347 |
| 55. | Coalition for San Francisco Neighborhoods   | 350 |
| 56. | Michael Alexander   | 365 |
| 57. | Star Alliance   | 373 |
| 58. | Fehr & Peers Associates, Inc.   | 376 |
| 59. | The San Francisco Partnership   | 379 |
| 60. | Friedman Fleischer & Lowe LLC   | 381 |
| 61. | United States Department of the Interior, National Park Service, Presidio of San Francisco/<br>United States Department of the Interior, Office of the Secretary, Office of Environmental<br>Policy and Compliance <sup>2</sup> | 383 |
| 62. | U.S. Environmental Protection Agency – Region IX  | 410 |
| 63. | American Association for the Advancement of Science   | 415 |
| 64. | California Department of Education  | 418 |
| 65. | Golden Gate National Recreation Area Citizens Advisory Commission   | 420 |
| 66. | Acting State Historic Preservation Officer, Office of Historic Preservation, Department of<br>Parks and Recreation  | 424 |

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<sup>2</sup> The Department of the Interior submitted a letter with identical comments to those contained in this letter submitted by the National Park Service. As the two letters are essentially identical, only one letter is reprinted here. Both letters are available for review at the Presidio Trust.



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LIST OF PUBLIC AGENCY AND  
COMMENTING ORGANIZATION LETTERS

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PUBLIC AGENCIES

|   |     |
|---|-----|
| California Department of Transportation (Letter 11)   | 104 |
| Golden Gate Bridge, Highway and Transportation District (Letter 12)   | 107 |
| San Francisco Bicycle Advisory Committee (Letter 22)  | 160 |
| Planning Department – City and County of San Francisco (Letter 36)  | 234 |
| San Francisco County Transportation Authority (Letter 39)   | 251 |
| San Francisco Unified School District (Letter 43)   | 265 |
| United States Department of the Interior, National Park Service, Presidio of San Francisco<br>(Letter 61)   | 383 |
| United States Department of the Interior, Office of the Secretary, Office of Environmental Policy<br>and Compliance (see bolded text at top of Letter 61) | 383 |
| U.S. Environmental Protection Agency – Region IX (Letter 62)  | 410 |
| California Department of Education (Letter 64)  | 418 |
| Acting State Historic Preservation Officer, Office of Historic Preservation, Department of Parks<br>and Recreation (Letter 66)                            | 424 |

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COMMENTING ORGANIZATIONS

|  |     |
|--|-----|
| Cow Hollow Neighbors in Action (Letter 3)  | 70  |
| Neighborhood Associations for Presidio Planning (Letter 4)   | 76  |
| National Audubon Society, Golden Gate Chapter * National Parks and Conservation Association *<br>National Trust for Historic Preservation * Natural Resources Defense Council * San<br>Francisco League of Conservation Voters * The Wilderness Society * Yerba Buena Chapter,<br>California Native Plant Society (Letter 7)                 | 88  |
| Sierra Club (Letter 8)   | 91  |
| University of California, Berkeley, Archeological Research Facility (Letter 9)   | 94  |
| Thoreau Center Partners, L.P. (Letter 13)  | 115 |
| Cow Hollow Association (Letter 15)   | 131 |
| San Francisco Bicycle Advisory Committee (Letter 22)   | 160 |
| Muwekma Ohlone Tribe (Letter 28)   | 195 |
| Cow Hollow Neighbors In Action/Marina-Cow Hollow Neighbors and Merciants (Letter 32)   | 208 |
| Fort Point and Presidio Historical Association (Letter 33)   | 214 |
| San Francisco Tree Council (Letter 40)   | 254 |
| As You Sow, Ecology Center, Golden Gate Audubon Society, National Trust for Historic<br>Preservation, National Parks and Conservation Association, Natural Resources Defense<br>Council, San Francisco League of Conservation Voters, San Francisco Tomorrow, San<br>Francisco Tree Council, Sierra Club, The Wilderness Society (Letter 44) | 267 |
| Sierra Club – Presidio Committee (Letter 46)   | 307 |
| Tides Foundation/The Tides Center (Letter 47)  | 316 |
| Urban Watershed Project (Letter 48)  | 328 |
| Western Office – National Trust for Historic Preservation (Letter 49)  | 332 |
| Sierra Club Loma Prieta Chapter (Letter 53)  | 344 |
| Coalition for San Francisco Neighborhoods (Letter 55)  | 350 |
| Golden Gate Natonal Recreation Area Citizens Advisory Commission (Letter 65)   | 420 |



***IA The Presidio Trust's Compliance with Applicable Laws [7-1, 21-3, 23-11, 23-12, 23-14, 23-26, 23-27, 23-79, 23-84, 24-6, 27-3, 27-6, 28-1, 44-1, 44-2, 44-5, 53-5, 61-2]***

Congress recognized the Presidio of San Francisco as a unique site with unique circumstances requiring unique solutions and institutional arrangements. Understanding the reasons for creation of the Presidio Trust (Trust) is important to an understanding of the Presidio and of the Trust's unique mandates. In 1972, U.S. Representative Phillip Burton authored legislation that determined that the Presidio of San Francisco (Presidio) would become part of the Golden Gate National Recreation Area (GGNRA) if the U.S. Department of Defense ever declared the base excess to its needs. In 1989, the Base Realignment and Closure Act designated the Presidio for closure. When the Army departed in 1994, jurisdiction over the Presidio transferred to the National Park Service (NPS).

For planning purposes, the NPS divided the Presidio into 13 planning areas. The General Management Plan Amendment (GMPA) prepared in 1994 by the NPS discussed each of these areas, and the environmental impact statement prepared in connection with the GMPA analyzed the environmental effects of the plan (GMPA EIS). The 1,480-acre post is unique in that it contains 780 buildings (470 of them historic), including two hospitals, barracks, offices, warehouses, a golf course, a bowling alley, a medical research center, and more than 1,100 housing units as well as a cemetery. Determining future uses of the Presidio has been a complex undertaking because of the highly varied mix of historic and non-historic buildings at the site and because of the substantial long-term finances needed to rehabilitate, preserve, and maintain the cultural and natural resources and infrastructure.

The Department of the Interior (DOI) developed early budget projections estimating the annual operating budget for the Presidio, exclusive of capital expenditures needed for infrastructure upgrades, at between \$34 to \$45 million per year – more than Yellowstone, Yosemite, Glacier, Great Smoky Mountains and Blue Ridge Parkway national parks combined. By comparison, the annual operating budget of \$17 million for the entire 2.2 million acres of Yellowstone Park, the next most expensive national park, is less than half of the monies needed for the Presidio. Congress was unwilling to commit federal monies requested by the NPS; instead Congress showed a willingness to create an innovative public-private entity which would be charged with the long-term protection and maintenance of the Presidio.

Congress enacted Section 103 of the Omnibus Parks and Public Lands Management Act of 1996, Public Law 104-333, 110 Stat. 4097 (Trust Act), creating the Presidio Trust. The Trust is a federal government corporation established for the purpose of managing the leasing, maintenance, rehabilitation, and improvement of the non-coastal portions of the Presidio in accordance with the purposes of the GGNRA Act and the General Objectives of the GMPA. The NPS continues to manage the coastal areas. The Trust's goal is to protect a nationally significant resource by providing revenues to the park while also decreasing the cost to the taxpayer and minimizing the financial draw-down on the federal treasury.

Some commentors asserted that the Trust's process has failed to comply with the Trust Act and other applicable law. Some of the unique characteristics of the Trust's mandate bear mentioning so as to give context to the



Trust's planning and decision-making process and to offer assurances that its proposed actions conform to applicable law.

The Presidio Trust, first and foremost, is bound by the law establishing the Trust – the Trust Act. Its requirements differ significantly from those that the NPS must meet in managing property under its administrative jurisdiction, and have been necessary elements of the Trust's decision-making process as it has moved forward with this EIS. Please refer also to Sections 1.1.4 and 1.2.1 of the Final EIS for further discussion of the Trust's unique charge.

First, the Trust must manage its portion of the Presidio in such a way as to become financially self-sufficient by 2013 – that is, to generate sufficient revenue without any federal appropriation to fund the operating and long-term maintenance costs for the Presidio. If the Trust is not successful in meeting this goal by the deadline, the 1,480-acre property, most under the Trust's administrative jurisdiction, will revert to the General Services Administration for disposal (Trust Act Section 104(o)). In adopting this requirement, the House Committee on Resources, where the concept of the Trust was elaborated, noted that its “greatest concern . . . has been the cost of the Presidio. The Committee cannot support funding levels for the Presidio as proposed in the NPS plan (the GMPA)” (U.S. Congress 1995b).

Second, consistent with the year 2013 deadline, Section 104(n) of the Trust Act requires the Trust, in selecting tenants, to give primary emphasis to those that enhance the financial viability of the Presidio and facilitate the cost-effective preservation of historic buildings. In adopting this criterion, the House Committee on Resources noted that it was “concerned that strict adherence to potential tenants targeted in the Presidio general management plan would result in leases that are substantially below market value and which would seriously undermine the financial viability of the Trust. Accordingly, the Committee believes that selection of tenants which enhance the financial viability of the Presidio is the most important criteria to be used in the tenant selection process” (U.S. Congress 1995b).

Third, Section 104(c)(1-4) of the Trust Act allows the Trust to evaluate for possible demolition certain categories of buildings. In formulating this directive, the House Resources Committee observed that “a key to development of a cost-effective program would be an expanded program of building demolition. The Committee urges the Trust to carefully examine the retention of each building at the Presidio” (U.S. Congress 1995b).

The Trust must read these requirements of the Trust Act together with the Act's requirement to manage the properties under its administrative jurisdiction in accordance with the purposes set forth in Section 1 of the Golden Gate National Recreation Area Act (GGNRA Act) (see further discussion below in master response 1C and in Section 1.1.5 of the Final EIS) and in accordance with the General Objectives of the GMPA (see further discussion in master responses 2A, 3A, and 3B and in Section 1.1.5 of the Final EIS).

Given the varied nature of its statutory directives, the Trust believes it is reading them together and in a manner consistent with one another so as to comply with all laws applicable to the actions it takes.



***1B The Presidio Trust's Compliance with NEPA Generally [14-2, 23-2, 24-6, 27-2, 28-1, 44-1, 44-2, 44-39, 61-2]***

Certain commentors raised the general question whether the Trust has followed the NEPA mandate and regulations. NEPA directs that a federal agency examine the environmental impacts of any major action it undertakes. If the agency determines the action may have a significant impact, the agency must prepare an EIS. The EIS must discuss the environmental impacts of the proposal as well as reasonable alternatives to the proposed action and their impacts. The agency must prepare and circulate a Draft EIS to other federal and state agencies and to the public for comment for a period of not less than 45 days. The agency must then respond to these comments in preparing a Final EIS. In so doing, the agency either must incorporate suggestions or explain its reasoning for rejecting them.

The Trust believes it has followed these procedures. A Draft EIS was prepared for the proposed action of development at the Letterman Complex. Three public hearings were held under the direction of the GGNRA Citizens Advisory Commission, the Trust being authorized by law to provide opportunities for public comment through that Commission (Trust Act Section 104(c)(6)). The Trust also requested written comments from various governmental agencies, as well as from the public (see master response 1E). The Trust is taking all necessary steps to ensure that it is fully complying with the requirements of NEPA.

***1C The Presidio Trust's Compliance with Other Statutes [23-11, 23-12, 23-14, 27-3, 61-2]***

One commentor noted that the Letterman Digital Arts, Ltd. (LDA) proposal (Alternative 5, Digital Arts Center) is incompatible with the 1916 statute creating the National Park Service (NPS Organic Act) and with the GGNRA Act. The NPS Organic Act applies only to the NPS. With regard to the GGNRA Act, the Trust Act makes it clear that the Trust is bound only by its general purposes, which are set forth in Section 1.1.5 of the Final EIS.

The proposed Letterman Complex project is consistent with the general purposes of the GGNRA Act, which direct the utilization of the GGNRA resources “in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management.” The GGNRA must be preserved “as far as possible, in its natural setting” and protected from “development and uses that would destroy the scenic beauty and natural character of the area.” By focusing development into an area that has been previously intensely developed, each of the proposals preserves the park in its natural and historic setting as far as possible. The Planning Guidelines, and later Design Guidelines for new construction, will ensure that the architectural amenities and site design conform to the historic and National Historic Landmark setting and will not degrade the character of the Letterman Complex planning area or the Presidio as a whole. Further, the Great Lawn, proposed as part of the preferred alternative, increases the amount of open space from the existing site conditions. Nothing in the Trust’s proposed action at the previously developed, but currently vacant, 23-acre site runs afoul of the broad purposes in the GGNRA Act.

While not directly pertinent in this document prepared under NEPA, it is worth noting that the Trust has complied with the regulations under the National Historic Preservation Act (NHPA). The NHPA requires a



federal agency to take into account the effects of its own undertaking on properties, like the Presidio, included on the National Register of Historic Places as a National Historic Landmark, to take steps to minimize harm to National Historic Landmarks that may be adversely affected, and before approval of an undertaking to give the Advisory Council on Historic Preservation (ACHP, the federal historic oversight agency) a reasonable opportunity to comment on the undertaking. The Trust has met each of these requirements. The Trust initiated Section 106 consultation under the NHPA for the Letterman Complex development concurrently with and integrated into the NEPA environmental review process. The Trust has concluded negotiations with the ACHP and with the California State Historic Preservation Office (SHPO) on a Programmatic Agreement for the Letterman Complex (see Appendix F of the Final EIS). This Programmatic Agreement sets forth a review process to ensure that new construction would be designed and sited to be compatible with the Presidio's National Historic Landmark status, to comply with the regulations that govern the NHPA, and to adhere to the site-specific planning and design guidelines that would address any adverse effects. For a more complete discussion of the relationship of this EIS to the NHPA and to the Planning and Design guidelines, please refer to Section 1.4 of the Final EIS.

***ID NEPA and Tiering from the GMPA EIS [23-2, 23-19, 27-2, 27-3, 28-1, 28-3, 44-5, 44-39, 44-40, 44-58, 47-8, 61-1 through 61-4, 61-15, 65-3]***

The Presidio Trust has tiered this EIS from the Presidio GMPA EIS.<sup>3</sup> The 1994 GMPA and EIS acknowledged the need for additional environmental analysis for future site-specific development plans, such as the proposed project, and thus set up the possibility for tiering from the GMPA EIS. The Trust made the decision to tier early in the planning process and after consultation with NPS NEPA compliance staff, which recommended the Letterman Complex project as being appropriate for application of a tiering analysis.

Tiering of environmental impact statements refers to the process of addressing a broad general program, policy, or proposal in an initial EIS, like the GMPA EIS, and analyzing a narrower site-specific proposal, related to the initial program, plan or policy in a subsequent EIS, as is being done in this Supplemental EIS. If tiering is utilized, the site-specific EIS contains a summary of the issues discussed in the first statement and incorporation by reference of discussions from the first statement. Thus, the second or site-specific statement would focus primarily upon the issues relevant to the specific proposal, and would not duplicate material found in the first EIS. It is a method encouraged by the NEPA regulations to streamline the environmental analysis process.

Some commentors maintained that tiering is inappropriate where replacement construction under the new alternatives is limited to the 23-acre site. This focus on a smaller geographic area, which differs from what was foreseen during preparation of the GMPA EIS, neither invalidates the tiering concept for those discussions in the GMPA EIS which are still relevant nor negates the environmental protections envisioned in the previous analyses. As an initial matter, nothing in NEPA requires the project to have been defined as a 60-acre project site, and the Trust had rational reasons for defining the project as replacement construction on 23 acres within

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<sup>3</sup> The Presidio GMPA EIS can be viewed at the Presidio Trust, 34 Graham Street, San Francisco, California or at GGNRA Park Headquarters, Building 201, Fort Mason, San Francisco, California.



the Letterman Complex (see Section 1.2.2 of the Final EIS). The Trust sought to generally approximate the density that already existed at the site. The Financial Management Plan (FMP), which established the financial parameters for the project, assumed the demolition of both LAMC and LAIR because of rehabilitation and obsolescence concerns. Because the GMPA limits new construction to previously developed and developable sites, the 23 acres, being the largest of the Presidio's developed sites, was the logical location to site the new replacement construction for both LAMC and LAIR. Furthermore, replacement construction at the 23-acre site was consistent with the GMPA's concept to perpetuate development on these 23 acres, a proposed use consistent with the intensive use of the site since at least the end of the nineteenth century. Refer also to discussion in master response 6A.

Having appropriately defined the proposed project as a 23-acre project, the Trust was entitled to tier its analysis of the project from the GMPA EIS. The NEPA regulations permit "tiering" from one EIS, usually a program or generic EIS like the GMPA EIS, to site-specific EISs like this Supplemental EIS, so as to enable environmental scrutiny at different stages in the development of projects or a project without either undue speculation in the first document or repetition in the second (40 CFR Sections 1502.20, 1508.28). The existence of the NPS' GMPA and EIS provides a paradigm of tiering. The GMPA and EIS provide the overall, park-wide context. They explicitly anticipated further studies and NEPA documents to analyze impacts of future site-specific projects to support implementation. To the extent intervening developments have resulted in a modification of a site-specific project beyond what was analyzed in the GMPA EIS, as in the case with the unwillingness of a medical research user to move to the Letterman Complex, the NEPA analysis provides the occasion for analysis of points of difference between what had earlier been proposed and the current proposals, as well as analyzing the environmental impacts of each alternative. Examples of such projects undertaken since the 1994 GMPA EIS include the *Crissy Field Plan Environmental Assessment (EA)* (NPS 1996d), the new *Presidio Golf Course Facilities EA* (NPS 1996e), and the *Presidio Fire Station Improvements EA* (NPS 1997c). Not only did all three EAs tier off the GMPA EIS, but the *Presidio Fire Station Improvements EA* was known from the outset of the project to be inconsistent with the GMPA EIS because it represented a change in use from what was previously proposed in the GMPA. Similarly, the *Presidio Golf Course Facilities EA* examined a site-specific proposal made after a change in circumstances (i.e., relocation of the maintenance facility to a more advantageous site) following the GMPA EIS.

Thus, not only was the Trust entitled to tier from the GMPA EIS, but it has performed an adequate and comprehensive tiering analysis that meets NEPA's requirements. The Environmental Screening Form (ESF) in Appendix A is a tiering analysis that summarizes 36 impact topics discussed in the GMPA EIS. For each impact topic, the ESF identifies and summarizes specific discussions that are still relevant to the alternatives and incorporates those discussions by reference into the EIS. The ESF also identifies those discussions which no longer apply under the changed circumstances and identifies issues specific to the project that require additional environmental analysis to what has already been prepared as part of the GMPA EIS. In sum, the tiering analysis in the ESF (Appendix A) determined whether and to what extent the analysis in the prior GMPA EIS is still sufficient for the proposed project. Prior to preparation of the Draft EIS, the Presidio Trust solicited 37 public agencies and 8 Indian Tribes to comment on the ESF, and 9 agencies responded. The Presidio Trust took into consideration the comments received on significant environmental issues and revised the ESF, the results of which appear in Appendix A. Commenting agencies included the California Department of Health



Services (1999), California Department of Water Resources (1999), California Department of Toxic Substances Control (1999), City and County of San Francisco, Department of Public Works (1999c) and Department of Parking and Traffic (1999e); National Park Service (1999e), U.S. Army, BRAC Environmental Office (1999); and U.S. Army Corps of Engineers, San Francisco District (1999). A summary of the significant environmental issues raised is provided in Section 5.3, Public Agency Consultation of the EIS.

Based on the results of the ESF analysis and consultation and coordination efforts (as further discussed in Section 5 of the EIS), the Presidio Trust has determined that the issues listed in Section 1.5 of the Final EIS required additional analysis under NEPA. The differences between the characteristics of the new alternatives not previously analyzed in the GMPA EIS and the GMPA's proposed action have been clearly identified in Table 1, Summary of Alternatives and described in detail in Section 2, Alternatives of the Final EIS.

Some commentors asserted that tiering is inappropriate because the Trust has not considered the effects of a project within the 60-acre Letterman Complex. To ensure an adequate analysis of the environmental impacts of implementing the project within the larger 60-acre complex, however, the Trust defined as Alternative 1 and analyzed in this EIS the GMPA's concept of a Science and Education Center to serve as a benchmark for comparison against the other alternatives that focused change within the 23 acres.

In discussing tiering, it is important to keep in mind that the NPS and the Trust have different sets of procedures. The NPS process typically includes scoping, drafting an EIS on scoped alternatives, selecting a preferred alternative, and issuing a request for proposals (RFP) based upon the preferred alternative. This process is compatible with, but not required by NEPA. The Trust, in contrast, first issued a request for qualifications (RFQ) for the proposed project and held public forums to obtain input on the scope of the alternatives and the specific impacts to be evaluated. Project proponents then responded to the RFQ, rendering conceptual alternatives, which are based upon real-world possibilities. Within the confines of the Trust Act and the GMPA, the Trust casts a wide net to open up the selection process to what the public and the market are willing to offer and build. This allows the Trust to meet the financial element of its purpose while at the same time identifying a full range of alternatives for analysis in accord with NEPA's requirements. See master response 6A in this document, and Sections 1.2 and 2.1 of the Final EIS for further discussion.

***1E Adequacy of Public Involvement Opportunities [7-1, 21-4, 23-1, 23-57, 23-58, 23-60, 24-6, 27-1, 27-10, 28-2, 28-6, 44-1]***

Several commentors asserted that the Trust failed to provide meaningful public involvement. In fact, the Trust designed the public involvement process to ensure that there were full public notice and hearing opportunities. The Trust, both on its own and through the GGNRA Citizens Advisory Commission, has held fifteen public meetings and workshops in connection with the Letterman Complex. These include two workshops that were held to solicit the public's input regarding appropriate uses for the Letterman Complex prior to the Trust's receipt of any proposals for the site. The Trust also held a public board meeting and hosted two workshops at which the four short-listed respondents from the RFP presented their detailed proposals. In anticipation of the preparation of the Draft EIS, the Trust held a public meeting to elicit comment regarding the scoping of environmental issues requiring further analysis. Upon its release, the Trust presented the Draft EIS to the



GGNRA Citizens Advisory Commission and held a public meeting to present an overview of the document. The Trust subsequently held a number of public hearings to receive public comment on the Draft EIS. After its announcement of a preferred alternative, the Trust extended the public comment period for an additional 45 days. Nearly 1,500 people have provided input, thus far, in public meetings sponsored by the Trust related to the proposed project, and the Trust has received more than 300 letters regarding reuse of the Letterman Complex. In addition to the Letterman Complex public meetings and workshops that the Trust has hosted, the Trust has made presentations at meetings independently sponsored by various neighborhood and community groups, including San Francisco Planning and Urban Research Association (SPUR) and Neighborhood Associations for Presidio Planning (NAPP). For a more complete discussion of the Trust's public outreach efforts associated with the proposed project, please refer to Section 5.1 of the Final EIS (History of Public Involvement).

***1F Preference for NPS Process [23-27, 28-2, 44-6]***

Some commentors who have expressed dissatisfaction with the Trust's public involvement process suggested that the Trust's use of the NPS planning process would be more effective and acceptable. Neither NEPA nor the Presidio Trust Act require the Trust to implement its projects by replicating the process of a particular other agency (see master response 1D above). To the extent the Trust contemplates implementing proposals whose impacts have not been previously and adequately analyzed in the EIS for the GMPA, the Trust will undertake further environmental review consistent with the requirements of NEPA, the NHPA, and other relevant environmental review laws and executive orders. The Trust's adoption of a streamlined process is necessitated by the need to make progress toward the Trust's mandate of financial self-sufficiency, a requirement to which NPS is not subject.

Furthermore, the Trust Act specifically contemplates that the Trust would have its own planning process. In light of the differences between the NPS and Trust mandates, staffing, and policies, the Trust's planning process cannot be and is not the same as the NPS process. The Trust is not required to use the NPS' planning procedures in order to implement its proposals. In fact, the Trust must endeavor to minimize time-consuming procedures that would jeopardize its ability to meet the 2013 deadline for self-sufficiency while meeting its mandate under NEPA. In sum, the Trust's legal mandates differ from those of the NPS, and the Trust is obligated to implement Congress's directives under the Trust Act.

***2A Conformity of Trust's Decisions with the GMPA [10-4, 13-16, 14-11, 14-18, 18-1, 18-3, 18-8 through 18-10, 19-1, 21-3, 23-8, 23-11 through 23-14, 23-21 through 23-24, 23-36, 23-50, 27-3, 27-4, 28-3, 33-2, 44-1, 44-2, 44-7, 44-9, 44-10, 44-12, 44-43, 47-2, 53-5, 55-1, 61-1, 65-2]***

Most commentors noted the importance of the GMPA as the foundational planning document for the Presidio. Some of these same commentors criticized the Trust, alleging it failed to select a development alternative that conforms to the plans and provisions of the GMPA. Although the General Objectives of that document, not its specific plans, are the guideposts required by law for future development, the Trust has announced that it will



go well beyond these minimum requirements of law and use the GMPA as the foundation for its planning decisions. It is the master document which guides the Trust in decision-making, despite changed conditions or additional needs that, at times, may require the Trust to reassess the implementation of certain of the GMPA's site-specific plans or programs.

The Trust Act, passed in 1996 after Congress and the President agreed on the legislation creating the Presidio Trust, directs the Trust to fulfill the purposes outlined in Section 1 of the 1972 legislation creating the GGNRA and to follow the General Objectives of the GMPA (see master response 3A and Section 1.4.1 of the EIS). Therefore, as a matter of law, the Presidio Trust follows the General Objectives of the GMPA. As a matter of policy, the Trust uses the GMPA as its principal guide for all Presidio planning activities.

In 1994, the NPS adopted the GMPA and Final EIS to guide planning for the Presidio. The GMPA is contained in the 150-page document entitled *Creating a Park for the 21<sup>st</sup> Century: From Military Post to National Park, Final General Management Plan Amendment, Presidio of San Francisco, Golden Gate National Recreation Area, California*, dated July 1994, and prepared by the NPS. Initial drafts of legislation that eventually became the Trust Act required the Trust to manage the Presidio in accordance with the GMPA (see U.S. Congress 1993, 1995a). The term "general objectives" was added, however, in recognition of both the Trust's need for flexibility in light of changing circumstances and the need to meet the 2013 deadline for self-sufficiency. In this regard, the House Resources Committee noted: "The Committee finds that the cost of the plan for the Presidio as completed by the NPS is unrealistic. While the Committee does endorse the "general objectives" of the [GMPA], the Committee recognizes that development of a reasonable program is essential to ensure the success of the Presidio Trust and the long-term preservation of the historical and other resources of the Presidio" (U.S. Congress 1995a).

Congress, therefore, explicitly did not accept all of the particulars of the GMPA because of conflicts with the economic requirements and the changing user environment already evident in 1996 when the Trust Act was enacted. Congress intended that its directive to follow the "general objectives" of the GMPA "be interpreted to mean such things as the general relationship between developed and undeveloped lands, continued opportunities for public access and protection of the most important historic features as expressed in the Plan, not to mean any specific elements of the Plan" (Hansen 1999).

The outcome of the Trust's process has in fact met the General Objectives of the GMPA (see master response 3). A Digital Arts Center (DAC), as the preferred alternative, offers an appropriate use involving many of the key planning objectives of the GMPA including "sustainability, . . . the arts, education, research, . . . innovation and/or communication." The DAC proponent offers research and development with its work in digital imagery in film arts and technology that has also been applied to other fields like medical research and diagnosis. The DAC proponent provides educational programming for schools, professionals, and others. Visitor experience would be enhanced through onsite contributions of services to create programs that interpret Presidio history and tell its sustainability story. The DAC would also enhance community services by supporting volunteerism, community outreach, and mentoring programs. The DAC, even more than the University of California at San Francisco (UCSF) proposal to NPS, enhances the scenic and cultural resources of the Presidio by removing LAMC and LAIR, modern structures that are architecturally non-distinctive and visually intrusive, and preserving, enhancing and restoring scenic vistas, including views to the Palace of Fine Arts. The 7-acre Great



Lawn or public park would further the GMPA’s General Objective to increase open space. Furthermore, the project would “consolidate the developed space” of the entire Letterman Complex, and the ground rents would be integral to the capacity to “sustain the Presidio indefinitely as a great national park in an urban area” (see Section 1.1.5, Consistency with Presidio Goals of the EIS).

To the extent that commentors perceive that the Trust has departed from the GMPA, it is only with respect to the site-specific plan set forth in the GMPA, which the Trust could not pursue because certain assumptions of the GMPA about the future of the Presidio have changed with time. Specifically, although not named expressly in the GMPA, there was an untested expectation that UCSF would locate its research and medical facilities at LAMC/LAIR as an anchor tenant. The GMPA was crafted with the idea that UCSF would lease LAIR, demolish LAMC if necessary, and then replace the LAMC square footage with approximately 450,000 square feet of new laboratories. Congress even passed legislation allowing NPS leasing and revenue retention authority specifically for the Letterman Complex to allow NPS to solicit specific medical research users for the complex. Although negotiations were opened, no agreement was reached, and UCSF subsequently decided to locate its facility at Mission Bay rather than the Presidio. Although NPS did open negotiations with other parties, specifically the City of San Francisco Department of Public Health, no agreement could be finalized for a medical research user. Since that time, no other suitable tenant has been identified for the existing facility that would adhere to the GMPA’s site-specific plan while also allowing the Trust to accomplish its clear directives (see master response 6A and Section 1.1.7 of the Final EIS for further discussion).

Certain commentors believe that the Letterman Complex proposals must be validated against other vision statements in the GMPA, which they characterize as its true “general objectives.” Most frequently, commentors cited the descriptive statement of the Presidio as a “global center dedicated to addressing the world’s most critical environmental, social, and cultural challenges.” In the commentors’ view, “If an action does not contribute to the fulfillment of the vision, it must be viewed with skepticism and trigger further work to define an outcome more in keeping with the plan” (see comment 44-7). This statement, however, while made in the GMPA, is not part of the General Objectives, and the Trust’s mandate is to follow only the General Objectives (see master response 3 and Section 1.1.5 of the Final EIS for discussion of the General Objectives of the GMPA).

Some commentors criticized a Digital Arts Center as fundamentally inconsistent with the development envisioned in the GMPA, which as noted above anticipated an anchor tenant in the field of science and research like UCSF. In fact, the preferred alternative is similar in many ways to the GMPA concept for the site as noted in Section 4.5.1, Consistency with Approved Plans and Policies in the EIS. A Digital Arts Center would foster the GMPA’s proposed major directions for the future of the Presidio by perpetuating the site as a building and activity core, and retaining and using the site for research, innovation in the digital arts, and educational purposes by a single tenant. Although the public would be unable to access many of a DAC’s building interiors, that would have been the case with a Scientific and Education Center as well. Both developments would contain significant scientific and educational components (see letter 43 from the San Francisco Unified School District). Further, a DAC enhances the park-like setting over and above the previously contemplated medical research facility by adding some 15 acres of open space in an area designated for parking in the GMPA. In addition, while some comments note that a DAC does not envision housing on the 23 acres, no housing was contemplated on the same 23 acres in the GMPA.



Further, commentors asserted that a DAC is, of the possible alternatives, the “least devoted to finding solutions to global concerns” and is a “radical departure from a Science and Education Center” contemplated by the GMPA. These comments appear to assume that the GMPA contemplated a use on the 23 acres specifically focused upon finding solutions to global concerns. Health sciences are clearly concerns shared around the globe, but the mission of the scientific research and education complex, as contemplated in the GMPA, would not have been directly focused upon environmental sustainability or worldwide cooperation. Groups with those focuses were, in the GMPA, to be located on other portions of the Presidio. That is still the case.

Some commentors suggested that the Trust offered no explanation for departing from the GMPA. On the contrary, the Trust evaluated the usefulness of the GMPA in the context of the Trust’s unique mandates and any changed circumstances since the GMPA was finalized. The GMPA was written long before anyone knew what form the new management entity (now the Trust) would take. It was written before anyone predicted that Congress would require that entity to be financially self-sufficient, and before it was known that the marketability of a research and education facility was not viable at the Letterman Complex. Indeed, other factors have arisen since the development of the GMPA that were considered by the Trust in deciding whether the specific statements in the GMPA can be used as an effective guide to the outcome of the Letterman Complex planning process. Even if viewed as a guideline for the proposed project, it need not be applied rigidly to every planning site and decision, so long as on balance the whole of the Presidio meets this goal and the General Objectives.

In fact, the alternatives analyzed do not represent so substantial a departure from the GMPA as is characterized by several commentors. The 900,000 square feet of development does not represent new construction over and above existing building space but rather replacement construction that roughly reflects the existing development footprint of LAMC and LAIR. Similarly, the proposed use as a Digital Arts Center involves the continued occupancy of over 800,000 square feet of building space by a single large institutional user. This could have been the result had NPS concluded a lease with UCSF in 1994 under its Letterman Complex RFQ. Thus, either under an early attempt to implement the GMPA or under the current proposal to implement the GMPA, between 800,000 and 900,000 square feet would be occupied by a single large institutional user.

Some commentors criticized the EIS alternatives, alleging that the Trust has based its decisions solely on its financial self-sufficiency mandate. The planning decisions for the Letterman Complex have been based upon a myriad of factors. Key among them has been the Trust’s consideration of the financial contribution that the proposed project can make to the Trust Act’s financial self-sufficiency mandate. Indeed, among the first official acts required of the Trust was to present to Congress the Financial Management Program showing how the Trust planned to meet its self-sufficiency requirement. Under the FMP, lease revenues account for \$35.6 million of the \$36.6 million needed annually to support the Presidio long-term, and the Letterman Complex lease is the single largest component (by 2.5 times) of the revenue needed. The 23-acre site lease accounts for one-third of non-residential lease revenues needed and 14 percent of total lease revenue (see Section 1.2.2 of the Final EIS and master response 10 for a more complete discussion of the FMP and the financial contribution of the project).

In consideration of these revenue needs and other factors in the Trust Act – that tenants that enhance the financial viability of the Presidio shall be given priority (see Trust Act Section 104(n) – it was fair to make



consideration of financial factors an important element of the planning and decision-making process. It cannot be fairly said, however, that decision making for the proposed project departed from the specifics of the GMPA solely because of the financial mandates on the Trust. The Trust has, in this instance, departed from the specifics of the GMPA because through the RFQ process, the specific type of tenant contemplated in the GMPA did not come forth to undertake the development. Given that reality, the Trust was obligated to identify another similar use for the parcel which would be consistent with the General Objectives of the GMPA and also facilitate the Trust's efforts to meet its statutory goal of self-sufficiency. A Digital Arts Center meets those objective needs.

**2B *Amending the GMPA [7-1, 18-9, 21-3, 23-8, 23-36, 44-12, 55-2, 65-4]***

Some commentors believe that the alternatives for the 23-acre site vary so substantially from the GMPA that the Trust should have amended the GMPA before proceeding with a development proposal for the Letterman Complex. Because the action being proposed is generally consistent with the GMPA, and because the Trust will continue to use the GMPA as the foundation for its planning decisions, there is no need to amend it. To the extent the proposed actions deviate from those in the GMPA and accompanying EIS, the Trust has identified those inconsistencies and is undertaking further environmental review consistent with the requirements of NEPA and the NHPA to supplement the GMPA EIS.

Under Section 104(c) of the Trust Act, Congress designated the Trust as a successor in interest to NPS for purposes of NEPA. The effect of this provision is to afford the Trust the benefit of the environmental analysis previously undertaken by NPS in support of the GMPA. NEPA requires only that the Trust analyze environmental impacts that were not previously or adequately analyzed in the GMPA EIS. The Trust is fulfilling this requirement by undertaking this EIS to supplement the GMPA EIS. This process allows efficient consideration of changed circumstances and offers the public opportunity for further review and comment on the differences without need of a full programmatic EIS each time there is need for a site-specific change in the plan (see master response 1D for further discussion). Neither NEPA nor the Trust Act require that the Trust formally amend the GMPA or adhere to the same planning process as that of the NPS to implement proposals that differ in certain respects from those in the GMPA.

**3A *General Objectives Identified and Adopted by the Trust [14-11, 23-13, 23-21, 23-32 through 23-35, 27-4, 27-5, 44-2, 44-5, 44-8 through 44-10, 44-58, 47-3, 49-2, 61-7]***

Several commentors claimed that the General Objectives of the GMPA adopted by Trust Board Resolution No. 99-11 are not truly those of the GMPA. They assert the Trust identified General Objectives that fail to match either the GMPA's letter or spirit, that omit important additional objectives of the GMPA, and that are self-serving in their bias toward flexible land use decision-making. The term "general objectives" of the GMPA as enacted as part of the Trust Act was not precisely identified either by Congress or within the text of the GMPA. It therefore fell to the Trust to interpret the provisions of its authorizing statute, for the administration of which it is responsible. The Trust engaged in a thoughtful process that ensured the identification of a comprehensive



set of objectives that were not only true to the spirit of the GMPA but also consistent with congressional guidance for the management of the Presidio. In order to provide guidance to the Trust staff in their day-to-day work, the Trust's Board and management initiated an internal process to develop a statement of principles that incorporates both the purposes of the GGNRA Act and embodies the General Objectives of the GMPA. In that process, Trust Board members, staff, and attorneys reviewed the GMPA. Several of these reviewers were participants in the planning process that led to the NPS' adoption of the GMPA and in the legislative process that led to Congress' enactment of the Trust Act. The outcome of that process was the Presidio Trust Board GMPA General Objectives Resolution No. 99-11.

The General Objectives, as identified by the Trust, are similar to an earlier statement of Presidio-wide goals prepared by NPS. In 1994, when NPS was itself attempting to lease the Letterman Complex facilities and when the GMPA had been prepared and was undergoing circulation in its draft form, the NPS issued its own RFQ for the Letterman Complex. In that document, the NPS stated that programs and activities should support park-wide goals to the fullest extent possible. "These park-wide goals," said the NPS, "are summarized below, and are more fully described in the Draft General Management Plan Amendment:

- Promote environmental stewardship and sustainability.
- Encourage cross-cultural and international cooperation.
- Provide community service and restoration.
- Promote health and scientific discovery (NPS 1994c).

Each of the NPS "park-wide goals" for the Presidio has been adopted, almost verbatim, as part of the General Objectives of the GMPA adopted by the Trust in Resolution 99-11, as have other objectives gleaned from the GMPA as a whole.

The Trust not only looked to such similar statements but also solicited comments from NPS on the resolution prior to its adoption. The NPS comments suggested an approach choosing specific sentences and phrases from various portions of the 150-page document to exemplify its objectives while incorporating by reference the GMPA's site-specific programmatic goals. This approach differed somewhat from the earlier NPS RFQ statement and from that of the Trust, which had attempted to distill the General Objectives in such a way as to give meaning to the term as used in the Trust Act.

The Trust, rather than looking only to the GMPA itself, looked also to the Trust Act and its legislative history. The assumption of the GMPA was the need for an ongoing federal appropriation of at least \$13 million annually for Presidio operations. The legislation as originally introduced did not include the requirement that the Trust be considered financially self-sufficient by a certain time. Once the legislation incorporated the restriction on federal appropriations and a specific time constraint for achieving self-sufficiency, it became clear that the Trust would need additional flexibility to reach the goal of a self-sustaining entity. Although early drafts of the Trust legislation required the Trust to manage the Presidio in accordance with the GMPA, the term "general objectives of the GMPA" was added in recognition of the need for implementation flexibility in light of changing circumstances and the need to meet the 2013 deadline for self-sufficiency. In view of this congressional guidance, the Trust was ultimately not able to reconcile the overall NPS approach to



identification of general objectives with what could appropriately be considered as the General Objectives of the GMPA as a whole, consistent with congressional guidance. Because of the differing approach, only certain NPS comments were incorporated into the final resolution, which was adopted by the Trust on March 4, 1999.

In addition to objecting to the substance of the General Objectives identified by the Trust, certain commentators assert that the Trust had no legal mandate to identify the General Objectives. Construction of a statute by the executive agency charged with implementing its provisions is a basic maxim of administrative law. Here, the Trust Act used a term, “general objectives of the GMPA,” which was not precisely defined. Courts routinely recognize the authority of executive agencies, such as the Trust, to interpret their authorizing statutes, so long as such statutes are open to interpretation. Where neither Congress nor the text of the GMPA precisely identified the General Objectives, the Trust was within its statutory authority to give a reasonable, and more precise, meaning to the language of its authorizing statute.

Commentors also asserted that the identification of General Objectives is self-serving in its bias toward flexible decision-making. Rather than being self-serving, the General Objectives take into account the legislative intent not to unduly restrict the efforts of the Trust to achieve its goals under the mandate imposed by Congress. Without the permanent and considerable federal appropriations projected by NPS for operation of the Presidio under the GMPA, it would have been unrealistic to have identified the General Objectives to include the constraints of a plan whose specifics relied upon a financial premise ultimately rejected by the Congress. The Trust was therefore acting within its authority and in accord with its legal mandate.

The concern of some commentors that the General Objectives reorient the Presidio under an alternate and impermissible vision from that of the GMPA is misplaced. These commentors are concerned that adherence to the General Objectives would preclude the Presidio from becoming a center dedicated to addressing the world’s most important environmental, social, and cultural challenges or a model of environmental sustainability. On the contrary, the GMPA remains the guiding document for the Trust and expresses the general will of the community and park planners for the future of the Presidio. Some commentors suggest that a private, profit-making entity dedicated to the development and production of digital arts and technology cannot meet these goals. This comment appears to assume that the GMPA contemplated a planned use focused upon a non-profit user engaged in a global environmental, social, or cultural challenge. A scientific research and education complex, as contemplated in the GMPA, would not have closely fit the commentors’ vision, but was nevertheless acceptable when the Presidio is considered as a whole. Groups with these global focuses were, in the GMPA, to be located on other portions of the Presidio. That is still the case, as evidenced by the presence of the Thoreau Center Partners and other non-profit organizations and tenants in the remaining portion of the Letterman Complex, as well as in other Presidio buildings and facilities.

One commentor asserted that the General Objectives identified by the Trust do not recognize the historical significance of the Presidio because of the modifier “as appropriate.” The General Objectives of the GMPA include the preservation and (where appropriate) enhancement of the cultural, natural, recreational, and scenic resources of the Presidio. Foremost among the cultural resources of the Presidio are the various facets of the park’s more than two hundred years of history. Thus, the historical resources are a central focus of the objectives of the GMPA, and their existence is a prime motivator of the Trust Act. Contrary to the concerns expressed about this language, the clause “where appropriate” modifies “enhancement” of these resources, not



“preservation.” Preservation of the resources of the Presidio is a central objective of the GMPA and an obligation under the NHPA, and is thus always appropriate. Use of this modifying clause “where appropriate” in connection with enhancement of resources is intended to indicate sensitivity to the complications inherent in “enhancing” or “improving” any resource, and the caution which would be exercised prior to any alteration of the facilities of the Presidio.

**3B Consistency of Trust’s Proposed Actions with the General Objectives of the GMPA [14-11, 18-1, 23-13, 23-21, 23-33, 27-4, 27-5, 44-2, 44-5, 44-8 through 44-10, 44-43, 47-3]**

Several commentors claimed that the actions proposed by the Trust are inconsistent with the General Objectives of the GMPA. The EIS specifically analyzes the consistency of each alternative with the GMPA General Objectives. For the preferred alternative, a Digital Arts Center, the analysis is set forth in Section 4.5.1.1. As noted there, a DAC is consistent with the General Objectives of the GMPA, which are identified in Section 1.1.5 of the EIS. Furthermore, although the preferred alternative would not implement all the particulars of the site-specific proposal of the GMPA, as set forth in Section 4.5.1.2, the preferred alternative is also consistent with a number of the more specific goals and planning principles of the GMPA (please see the discussion in Section 4.5.1.2 for a full response to these comments).

**3C Process to Identify the General Objectives [23-32, 23-34, 27-4, 27-5, 44-2, 44-5, 44-8, 44-9, 47-3, 49-2]**

A number of commentors believe that the Trust has engaged in an improper process for identifying the General Objectives of the GMPA. Some commentors believe that the Trust’s identification of the General Objectives required an amendment to the GMPA and independent NEPA review. The commentors’ assertion wrongly presumes that the Trust’s adoption of the General Objectives has abandoned or changed the GMPA. On the contrary, the Trust Board resolution acknowledges the importance of the GMPA to the Trust’s planning process and implements a clear and overriding policy directive that Trust staff be guided by the GMPA’s General Objectives in managing the property under the Trust’s jurisdiction. The Trust continues to use the GMPA as the foundation for planning decisions. It is the master document that guides the Trust in decision-making, and is the current comprehensive plan for the Presidio, despite the fact that changed conditions may require the Trust to reassess certain site-specific plans and programs in the GMPA, occasioning NEPA review.

Other commentors claimed that the General Objectives could not be properly identified or adopted by the Trust without an opportunity for public review and comment. There is no requirement under the law to have provided the public with the opportunity for notice and comment or advance publication prior to the Trust’s adoption of Resolution 99-11 (see 5 U.S.C. Section 553(b) and (d)). Nevertheless, the Trust welcomes comment on Resolution 99-11, as it welcomes comment on all its resolutions and activities. Furthermore, the Trust intends to continue to solicit comments on its identification of the GMPA’s General Objectives, on its general planning process, and on specific proposed actions of the Trust.



A few commentors suggested that the Trust Act itself required that the Board Resolution identifying the General Objectives be subject to public review and comment. Section 103(c)(6) of the Trust Act requires the Trust Board to establish “procedures for providing public information and opportunities for public comment regarding policy, planning, and design issues.” Pursuant to this provision, the Board established the Trust’s Public Outreach Policy, which encourages members of the general public to make their views known to the Trust (refer to Section 5.1.1 of the Final EIS for further discussion). The public is free to provide comment on the resolution in writing, by phone, or at a variety of public meetings pursuant to the policy. However, while the policy encourages public input in a variety of ways, it imposes no requirement on the Trust to have made the resolution subject to formal notice and comment.

**4A *Need for a Comprehensive Planning Document*** [10-1, 14-3, 14-11, 15-3, 44-2, 44-4, 44-5, 44-9, 44-11, 44-12, 44-39, 44-40, 44-43, 49-3, 61-1, 61-2, 62-3, 65-5, 65-6]

Some commentors raised questions about a master plan for the portion of the Presidio under Trust jurisdiction. Such a comprehensive plan for the Presidio already exists in the GMPA. The GMPA comprehensively addresses a plan for the 13 major planning areas at the Presidio and other resource management plans, including natural areas, visitor services, transportation, and sustainability. The Trust is required by statute to follow the General Objectives of the GMPA, and the Trust has announced as a matter of policy that it would go beyond the statutory command and follow the GMPA unless there is a specific change of circumstance or other need that warrants not doing so.

By way of example, specific to this EIS, the need for certain site-specific modifications 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 simultaneously fulfilling the Trust Act’s mandate for financial self-sufficiency.

The Trust preliminarily concluded that the preferred alternative, a Digital Arts Center, is fundamentally consistent with and fairly approximates the development envisioned in the GMPA, which anticipated that a scientific research and education facility would occupy LAMC/LAIR as an anchor tenant. The developments are equivalent in many ways, including the public access aspects, the research and education components, the extent of open space (with a DAC actually increasing unpaved open space), and the absence of a housing component. These similarities are more fully discussed in master response 2A.

For those commentors who would rather have seen the development expanded to include consideration of the entire 60 acres within the Letterman Complex rather than the 23-acre site, it is consistent with NEPA to have focused the scope of the proposed project on the 23 acres (see further discussion in master response 6A). Furthermore, this Final EIS has thoroughly studied the effects of focusing development within 23 acres. For the purposes of comparing the magnitude of impacts of Alternatives 2 through 5, which would limit development to the 23 acres, the Science and Education Center (Alternative 1 in the EIS) contemplates and approximates an intensity of development on the 60 acres as is envisioned in the GMPA. Alternative 1 thus provides an



important baseline to show the effects of spreading the density across the complex as compared to retaining the entire development within the 23-acre site. It must be borne in mind that the 23-acre Digital Art Center approximates the density of development and the footprint of the existing LAMC and LAIR. Section 4.1 of the EIS includes an analysis of the impacts of either leaving LAIR and LAMC intact or of replacing LAMC with an equal square footage and keeping LAIR (please refer also to Section 1.2.2 of the EIS and master responses 1D, 2A, and 6A for further discussion of the 23-acre site).

Replacement construction on the 23-acre site as proposed in Alternatives 2 through 5 would foreclose the opportunity for the construction of new infill buildings within the adjacent historic hospital complex as was called for in the GMPA. The implications of this are that if the 900,000-square-foot development on the 23 acres in this proposal is completed, future projects in the Letterman Complex, such as rehabilitating existing buildings not identified for demolition, would be limited to no more than 400,000 square feet total so as not to exceed the 1.3-million-square-foot cap studied under the GMPA.

More generally, it is important to view the GMPA in context. The NPS proposed detailed implementation of that plan and requested long-term annual funding of \$13 to \$15 million from Congress to do so. Congress refused, and instead created the Presidio Trust, giving it a mandate to achieve financial self-sufficiency within 15 years. The stark reality of the congressional command is one of the guides for the Trust. That, in turn, has led the Trust to the awareness that a continued focus on the generation of plans cannot be permitted to preclude taking the actual steps which would lead to financial self-sufficiency. Therefore, in the real world of a congressionally determined 15-year deadline before the Presidio is transferred to the General Services Administration (GSA) to be sold to the highest bidder and ceases to be a national park, using the GMPA as the Trust's basic guidance and moving to actual actions to achieve the congressional purpose makes sense. The GMPA is the Trust's comprehensive planning document. To the extent intervening events have upset certain site-specific assumptions of the GMPA, as was the case with the Letterman Complex, a site-specific NEPA analysis will discuss the departures from the GMPA and analyze their environmental impacts. Otherwise the GMPA guides the Trust. NEPA does not require anything other than that.

Some commentors asserted the need to prepare a new comprehensive planning document, specifically the comprehensive management program (CMP) referred to in the Trust Act, in order to provide a planning context before moving ahead with the proposed project. The CMP contemplated under the Trust Act (Section 104(c)) is of a potentially more limited scope than envisioned by commentors. The Trust Act calls for the Trust to develop a program consisting of options to carry out routine administrative and facility management programs and re-evaluation of rehabilitation, demolition, and replacement construction for certain existing structures. By contrast, the GMPA provides the Presidio-wide planning assumptions that the commentors seek to fulfill through a new comprehensive plan or the CMP. Under the GMPA, the Letterman Complex has been considered and analyzed among all of the proposed developments within the Presidio, and through this 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 for purposes of NEPA, NEPA does not require development of a new comprehensive plan for this Supplemental EIS. Nevertheless, both NPS and the public 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 to depart from the site-specific proposals of the



GMPA. The Trust believes that the best means to understand the Trust’s approach to GMPA implementation is to undertake certain additional comprehensive planning that tiers off the GMPA. In proposing this undertaking, the Trust acknowledges and wishes to respond to the strong sentiment of NPS as a cooperating agency and the public generally to clarify the Trust’s Presidio-wide approach to circumstances that have changed since finalizing the GMPA and to the specific comprehensive program elements of Section 104(c) of the Trust Act. The Trust has made no decisions on the scope of such comprehensive planning, but anticipates future public sessions to involve the interested community in helping to define both its scope and content.

**4B Adequacy of Cumulative Effects Analysis [10-1, 14-2, 14-3, 32-6, 44-39, 44-55, 46-1, 46-11, 47-8, 49-3, 49-4, 55-3, 61-2, 61-18, 61-19, 61-32]**

Several reviewers felt that the Final EIS should better assess cumulative impacts, and that the Presidio Trust should document that effort. In response to the comments, revised sections on cumulative impacts are now disclosed in Sections 4.1.11. through 4.6.11 for each alternative in Section 4. The future actions that were included in the cumulative effects analysis are listed in Table 9 and shown in Figure 14 in the Final EIS. These actions, which include activities occurring outside of the Presidio Trust’s jurisdiction, were chosen based on their proximity to the Letterman Complex, their potential influence on the same resources affected by new development and uses within the 23-acre site (i.e., whether the effects of these actions would be similar to those of the project), and the likelihood of their occurrence.<sup>4</sup> The actions were identified based on consulting with all agencies within a project impact zone (defined for the analysis as the entire Presidio and surrounding neighborhoods) and investigating their actions in the planning, budgeting, or execution phase. The plans included nine originated by the Presidio Trust (including all proposals/development plans in the Request for Qualifications or Request for Proposal stages), three from the City and County of San Francisco, two from the National Park Service, one from the Golden Gate Bridge, Highway and Transportation District, and one from the San Francisco County Transportation Authority.<sup>5</sup> Additional information on the listed actions is also provided in Appendix G of the Final EIS.

While the guidance on cumulative effects analysis in the Council on Environmental Quality (CEQ) handbook (1997) emphasizes the effects of projects on ecological resources, these resources would not be affected by the project.<sup>6</sup> Therefore, the analysis focused on other resources and areas that may be significantly affected, including solid waste, water supply and distribution, schools, housing, traffic and transportation systems, cultural resources (including visitor experience and visual resources), air quality, and noise. The level of analysis and scope of cumulative impact assessment within each of these resource areas in the Final EIS is commensurate with the potential impacts, i.e., a greater degree of detail is provided for more potentially serious impacts. Cumulative effects were also compared to appropriate national, state, regional, or community goals to

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<sup>4</sup> The CEQ handbook (1997) concerning cumulative effects analysis under NEPA recommends that such analysis should “count what counts,” not provide superficial analysis of a “long laundry list” of issues that have little relevance to the effects of the proposed action or the decision (page 12). The handbook recommends analysts to identify and characterize the effects of other actions on the *same* resources that may be directly or indirectly affected by the proposed project (page 23). (emphasis added)

<sup>5</sup> It should be noted that none of the agencies consulted have developed planning documents that identify proposed future actions in the project impact zone to facilitate the cumulative effects analysis, and therefore the Trust relied on other sources of available information to predict which future actions might reasonably be expected.

<sup>6</sup> As documented in Sections D, Water Quality; O, Wetlands and Stream Drainages; P, Native Plant Communities; Q, Wildlife; and R, Special Status Species in Appendix A of the Final EIS.



determine whether the total effect would be significant. The analysis in the Final EIS determined that cumulative impacts would not be significant and that the resources of concern would not be degraded to unacceptable levels.

Three further types of potential cumulative impacts merit specific mention. First, the cumulative impacts of implementing storm water pollution prevention plans (SWPPPs) at construction projects throughout the Presidio are not discussed in further detail, as suggested by several of the commentors, because these impacts have been previously analyzed in the GMPA EIS (as discussed and incorporated by reference on page A-20 of the Draft EIS) and would not be significant. Furthermore, since the SWPPPs are performance-based to the extent that they would prohibit the discharge of storm water that would cause or threaten pollution, contamination, or nuisance, and they would allow the Presidio Trust to determine the most economical, effective and possibly innovative best management practices, cumulative impacts of the projects would be zero. This is especially true in light of the fact that the SWPPPs would comply with requirements in the statewide General Permit adopted to deal with the cumulative problem of all storm-water discharges associated with construction activity. Permit conditions are consistent with the San Francisco Bay Regional Water Quality Control Board's erosion and sediment control policy (Resolution No. 80-5) and consistent with local agency ordinance and regulatory programs. The SWPPPs would also comply with the San Francisco Bay Region Basin Plan, the master policy document that contains descriptions of the legal, technical, and programmatic bases of water quality regulation in the San Francisco Bay region, which also establishes conditions (discharge prohibitions) that must be met at all times.

Second, as noted by one commentor, the EIS does not include a discussion of the cumulative effects of the project on the future restoration potential of Tennessee Hollow. New mitigation measure SD-1, *Protection of Tennessee Hollow* would ensure that no potential infill construction associated with Alternative 1 would interfere with future restoration of the stream drainage. Alternatives 2 through 5 would limit replacement construction to the 23-acre site and would have no effect on restoration of Tennessee Hollow. The only other relevant project in the cumulative scenario (Morton Street Field) has incorporated environmental conditions into the project to coordinate the recreational use of the field in the short term with future restoration planning (refer to Appendix G). Projects that were considered but excluded from the cumulative analysis (as identified in Table 10 of the EIS) include the *Trails and Bikeways Master Plan* (NPS 1999h) and the *Draft Vegetation Management Plan* (NPS 1999a). These projects would have no cumulative effect on Tennessee Hollow restoration for the following reasons:

- *Trails and Bikeways Master Plan* – The *Trails and Bikeways Master Plan* would direct future construction, modification and maintenance of Presidio-wide pedestrian and bicycling trails. The majority of Presidio trails were neither professionally aligned nor constructed with respect to soils, topography, or vegetation (including sensitive plant communities). The trails are often highly erosive, resulting in degradation. The project would provide improvements and priorities to correct erosion problems and relocate trails to minimize impacts on Tennessee Hollow. The project would also minimize human contact with the stream drainage, improve trail alignments and provide site-specific design and construction details to minimize impacts, including erosion, trampling, and social trail creation, all of which contribute to the degradation and future restoration potential of the stream drainage.



- *Draft Vegetation Management Plan* – The *Vegetation Management Plan* would provide for the restoration of the Tennessee Hollow stream drainage, enhance water resources by restoring natural drainage patterns, improve water quality through reduced sedimentation, and increase riparian and wetland habitat. An action plan for restoration of the stream drainage would identify specific impacts on water quality. If needed, Section 402 and 404 permits in compliance with the Clean Water Act would be obtained. Identified erosion problems would be corrected and soil loss would be reduced, resulting in a long-term beneficial impact on soils. Erosion in restoration areas would be limited by replanting and soil stabilization wherever soils are disturbed.

Finally, no additional cumulative analysis is required for native plant communities. The net cumulative effect of implementing detailed landscaping plans to enhance native plant communities in areas where no native vegetation would be disturbed by construction projects (as within the 23 acres and other sites contemplated by the Presidio Trust for development as identified in Table 9) would be highly beneficial. The landscaping plans would be consistent with the broad objectives for the management of landscape vegetation in the Presidio’s *Draft Vegetation Management Plan* (pages 56 and 57) which guide the management of the Presidio’s designed landscape vegetation and with the Planning and Design Guidelines.

**5     *Availability of Trust’s Financial Plan and Assumptions [14-11, 18-9, 19-1, 20-2, 23-14, 27-6, 44-1, 44-4, 44-39, 44-43, 44-58, 47-5, 47-6, 53-1]***

Several commentors criticized the Trust for having based its selection of the preferred alternative on financial necessity without disclosure of its budget assumptions. These commentors request that the EIS include the financial information on which the Trust based its decisions. The Trust’s Financial Management Program, which contains the Trust’s financial planning information, has been and continues to be publicly available. In response to the comments, it is now also being included as Appendix E of the Final EIS (for a more complete discussion of the FMP and its relationship to this EIS, please refer to Section 1.2.2 of the Final EIS).

These commentors asserted that the Trust should have made its financial assumptions and plan available for public comment and review. The Trust did so during development of the FMP. During the spring of 1998, to achieve the congressionally imposed mandate of preserving the Presidio without long-term federal funding, the Trust held a public Board meeting and a series of public workshops to develop the financial program. The public was invited to and participated in this process. Furthermore, following the document’s submittal to Congress, the Trust mailed it to requestors on the Trust’s mailing list, posted it on the Trust’s website, and made it publicly available at the Trust library. To provide additional information and explanation to the public, the Presidio Trust published a detailed article in the September 1999 issue of the *Presidio Post*, the Presidio Trust’s newsletter, and hosted an additional public meeting on the topic on September 27, 1999. Therefore, the Trust’s financial plan and assumptions have been and continue to be available for public comment and review as part of this EIS process. See Section 5.1.2 of the EIS for further discussion.

As required by Section 105(b) of the Trust Act, the FMP illustrates how, with prudent investment and rigorous attention to financial performance, the Trust can achieve financial sustainability while also meeting its primary mission of preserving and renewing the park for current and future generations. Central to the document is the



concept of financial sustainability — the idea that the Presidio would provide for its own operational revenues, capital investment income, and replacement reserves required over the long term.

Commentors asserted that the public has been denied the opportunity to evaluate to what extent the proposed project fits into the Trust's overall financial plan. This information, though, is set forth in the FMP and in the background documents that led to its development. While today, federal appropriations provide most of the park's funding, by 2013 the Trust would be required to cover all of its costs through revenues. To achieve financial self-sufficiency, the Trust must earn enough revenue to fund operations and improvements and to repay debt. In fiscal year 2013, the FMP projects revenues of \$36.6 million (1998 dollars). Those expected sources of revenue, broken out by Presidio planning area, show that the Letterman Complex is a critically necessary element of the Trust's plan to achieve financial self-sufficiency by 2013. The Letterman project is projected to contribute \$5 million annually to Trust revenues, and 14 percent of all Trust revenues by 2013. Letterman Complex revenues are also a key source for funding long-term investments in other areas of the park.

Furthermore, the financial information and assumptions that underlie the FMP, and the Letterman Complex particularly, are subject to periodic scrutiny by both the public and Congress. The Trust Act requires that Congress, through the General Accounting Office (GAO), oversee the Trust's progress towards financial self-sufficiency. The progress toward meeting its preservation and financial goals must be presented to Congress and to the public annually in the Trust's year end reports. Pursuant to Section 106(a) of the Trust Act, GAO will in 2000 conduct an interim study of the Trust's activities and progress toward its goals, and develop an interim plan and schedule to reduce and replace the Trust's federal appropriations with lease income. Therefore, an essential need of the proposed project is to be able to demonstrate significant progress toward the self-sufficiency goal by three years after passage of the Trust Act and the first meeting of the Trust Board of Directors. A more complete discussion of the financial need for the proposed project, as well as analysis of the effects of eliminating or reducing Letterman Complex revenues, is set forth in master responses 10A and 10B.

**6A   *Adequacy of Scope of Alternatives* [4-1, 10-1, 10-3, 10-4, 14-2, 19-1, 20-2, 44-2, 44-4, 44-38 through 44-40, 44-44, 44-58, 47-5, 49-3, 61-3, 61-15]**

Several commentors criticized the Trust for apparently failing to consider a full range of options as required by NEPA. A few suggest that certain alternatives, although included, would never have been seriously considered for selection and that the others failed to reflect the full range of options. On the contrary, the Trust analyzed the environmental impacts of six alternatives in the Draft EIS. Although it may have appeared unlikely that a no action alternative (Alternative 6) would be chosen, the Trust is required under NEPA to evaluate the impacts of a no action alternative, and it has done so. Similarly, even where there had been no proposal submitted for a Science and Education Center (Alternative 1), not to have considered this alternative given the history of the GMPA EIS would have eliminated an important baseline proposal and therefore would have been inappropriate. See also related discussion in master responses 1D and 4A. For a complete presentation of the full range of alternatives considered but rejected, refer to the discussion in Section 2.2 of the Final EIS.

Not only did the Trust consider a broad range of options both in the Draft EIS and otherwise, the process to identify options was designed to cast a wide net. In response to the unique financial, planning, and tenant



selection mandates of the Trust Act (see the discussion in master response 1A), of key importance to the Trust's process was to identify alternatives based upon proposals that the marketplace could actually offer. Building the process of alternative identification around this efficiency was intended to avoid the result of having studied and selected a prospective use for a particular site for which no tenant could ultimately be found, as was the case when NPS attempted to lease the LAMC/LAIR facilities following the Draft GMPA EIS.

When NPS issued its RFQ in 1993 soliciting proposals for reuse of the Letterman Complex, of 16 proposals received, only two were for medical laboratory use of LAIR. Of the two, NPS chose to enter into negotiations with the UCSF medical center. The other proposed user for LAIR was the California State Department of Health Services (DHS), proposing use of the laboratories for public health programs. By the time negotiations with UCSF had reached an impasse, however, the DHS had already committed to a project to consolidate its laboratory operations in Richmond, California. NPS then negotiated with the City of San Francisco Department of Public Health for temporary use of LAIR as laboratory and office space, but no agreement could be reached.

To avoid a similar result, the Trust, through an RFQ for the Letterman Complex, solicited market-based proposals. The Presidio Trust's notice of the availability of the RFQ for the Letterman Complex was sent to about 4,000 prospective users. The RFQ itself was sent to 2,400 organizations based on the response to initial mailing and targeted user groups. Consistent with the GMPA, biotechnology and medical research companies and organizations were included in the targeted user groups. The Presidio Trust identified prospective tenants using Dun and Bradstreet national listings for tenants in specific industries and San Francisco Bay Area listings of largest companies in specific industries. Industries targeted from the national database included Scientific Research and Development Services (SIC 5417) and pharmaceutical and medicine manufacturing (SIC 3254). Locally, the largest employers in the following areas were contacted: biotechnology/biopharmaceutical companies, medical device companies, and hospitals. Finally, the Presidio Trust made an extensive outreach to the real estate brokerage community in an effort to reach users actively seeking space. The extensive outreach was made in an effort to bring forth a scientific research and education user capable of offering to implement the specific use proposed in the GMPA for the LAMC/LAIR site. In the absence of a qualified respondent for this specific type of use, the Trust would have other alternatives, supported by the market, to consider.

The Trust received responses from 18 submitters representing a range of available alternatives. The Trust rejected the majority of proposals either because they failed to meet the minimum standards for development, including consistency with the General Objectives of the GMPA, or because the submitter failed to meet the minimum financial capability qualifications. The four remaining market-based alternatives ultimately studied in the Draft EIS represented real world possibilities rather than conceptual suggestions that the marketplace could not support. Although commentors would have preferred that the Trust study alternatives that involved a different program focus or different mix of organizational types, no minimally qualified proposers came forward to offer any such alternatives, and they were therefore not included within the range of alternatives studied in the Draft EIS (for a more complete discussion of the development of alternatives, please refer to Sections 2.1 and 2.2 of the Final EIS).

NEPA does not dictate otherwise. It is permissible under NEPA for the Trust to have solicited proposals that then form the basis of alternatives to be studied rather than studying theoretical alternatives that become the basis of later solicitation for proposals. The Trust had rational reasons for choosing the former approach, and



commentors are, therefore, mistaken in the belief that NEPA required the Trust to study a different range of alternatives (see master response 1D for further discussion).

Commentors criticized that the Trust improperly limited its range of development options by focusing its market-based solicitation on a 900,000-square-foot development within a 23-acre site within the Letterman Complex. On the contrary, the Trust had a number of rational bases for focusing its project in this way. With respect to the 900,000 square feet, this is the size of development needed to yield sufficient income to the Trust to meet the FMP's forecasted revenue for the Letterman Complex. Pre-existing and updated 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 proposed for development 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 (see master response 10A and 10B for further explanation).

In addition, 900,000 square feet of development does not represent new construction over and above what already exists at the site, but rather replacement construction that generally reflects the existing development footprint of LAMC and LAIR. NPS carried this approximate footprint through to its 1994 RFQ for the Letterman Complex. The NPS RFQ assumed retention and reuse of LAIR and allowed for new replacement construction predominantly, although not entirely, within the 23-acre site to replace LAMC. Had NPS concluded a lease with 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.

Besides its recent history as a building site, the area immediately surrounding and within the 23-acre site is one of the only sites on the Presidio that historically have 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 Section 1.1.5). Therefore, the area immediately surrounding and within the 23-acre site has had a history of intensive use.

In addition to continuing the historic density and intensity of use on the 23-acre site, the Trust considered a number of other important reasons for limiting new replacement construction to the 23 acres. First was its potential for new construction under the GMPA. The GMPA severely limited the amount and location of new construction at other Presidio sites. The 23-acre site, being an already built-out area of the Presidio, is by far the largest among the limited number of sites identified in the GMPA for potential new construction. No other parcel could accommodate as large a development offering.

Also considered by the Trust was the absence of historic buildings on the 23-acre site. Unlike the remainder of the 60-acre complex, the 23-acre site did not house historic buildings, which add complexity and 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 of a scale needed to satisfy the FMP financial parameters for the Letterman Complex. Being a previously developed site, which already had over 800,000 square feet of existing but outdated non-historic building space, it presented a singular opportunity to offer a contiguous parcel for new development, a rarity in San Francisco.

Third, in addition to the 23-acre site offering maximum development flexibility, the physical and geographic characteristics of the site are appropriate to the proposed project definition. 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.

Lastly, the Trust factored in real estate marketing and development considerations in deciding to focus development within the 23 acres. While developing the RFQ, real estate development consultants advised the Trust that revenue-generating potential could be severely constrained unless development was contained to a site that could be easily marketed and managed. The consultants recommended that marketability could be improved by focusing infrastructure improvements to 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 simplified but viable development proposals from single institutional users. Dealing with a single developer/user could significantly simplify the lease negotiation process as compared to dealing with multiple parties for a single development parcel. When all these factors were considered together, the 23-acre site presented an opportunity not available at other sites in the Presidio. 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. For all these reasons, the Trust considered it rational to focus its solicitation on 900,000 square feet of new replacement development within the 23-acre parcel at the Letterman Complex.

**6B Perception of Pre-Selection by the Trust [7-1, 14-3, 18-2, 19-1, 24-1, 44-15, 44-44, 44-56, 47-7, 49-8, 53-3, 61-3, 61-15]**

Several commentors believe that the Trust used an improper selection process. They suggest that the Trust violated the NEPA prohibition on making a selection before the comment period had closed or before the NEPA process had been completed. That has not happened (for further discussion on these topics, please refer to Section 5.2 of the Final EIS). The identification of a preferred alternative before the close of the public comment period did not run afoul of NEPA. In fact, selection of a preferred alternative prior to the Final EIS is the favored procedure under NEPA. A “preferred alternative” is “the alternative which the agency believes would fulfill its statutory mission and responsibilities, giving consideration to economic, environmental, technological and other factors” (see Forty Questions No. 4a in CEQ 1981). CEQ regulations provide that an



agency shall “identify the agency's preferred alternative or alternatives, if one or more exists, in the draft statement and identify such alternative in the final statement” (40 C.F.R. Section 1502.14(e)).

The Trust has identified its preferred alternative, a Digital Arts Center (Alternative 5), to allow members of the public to focus their comments on the alternative that the Trust believes best meets its statutory goals. The Trust was not required under law to identify a preferred alternative in the Draft EIS, and indeed, the Trust had not yet selected a preferred alternative when the Draft EIS was prepared. The Trust is required, however, to identify a preferred alternative in the Final EIS. Page xiii of the Draft EIS noted this procedure. Although under NEPA the Trust is within the ambit of the CEQ regulations to identify a preferred alternative without public input, the Trust went beyond NEPA’s requirements in identifying its preferred alternative before the Final EIS was prepared and then extending the public comment period in order to allow the public to provide focused comments on the preferred alternative. While one commentor believes that the identification of a preferred alternative does not afford the public adequate opportunity to comment on a range of alternatives, no alternative has been eliminated from selection as a result of identifying one alternative as preferred, and comments on all remaining alternatives have been fully considered.

Some commentors also criticized the Trust for having begun negotiations with the proponent of the preferred alternative, Letterman Digital Arts Ltd. (LDA), before completion of the NEPA process. These commentors assert that the start of negotiations makes hollow the Trust’s point of view that no final determination has been made. On the contrary, NEPA requires only that the Trust not take any action that would preclude the choice of other alternatives (40 C.F.R. Sections 1502.2(f), 1506.1(a)). NEPA does not require that all planning be suspended during the EIS process. The Trust identified a Digital Arts Center as the preferred alternative, and entered negotiations with LDA as the development team submitting a proposal conforming to this alternative — similar to what NPS did with UCSF prior to release of the final GMPA EIS. Although the Trust has begun negotiations with LDA, these negotiations no more commit the Trust to a Digital Arts Center alternative than the RFQ committed the Trust to pursue development at all. No actions have been taken which prevent the Trust from ultimately using one of the alternative scenarios, or which otherwise commit the Trust to accepting LDA’s proposal. In order to streamline the proposed project, the Trust has begun negotiations with LDA to test the bidder’s willingness to adhere to the project’s necessary parameters. As noted by the Trust’s Executive Director, James Meadows, in a May 3, 1999 press release, however, if there were any problems with proceeding with the LDA proposal, whether environmental concerns or unrelated logistical disagreements, the Trust would be free to begin discussions with other project developers pursuant to the same EIS. For a complete discussion of the preferred alternative selection process, please refer to Section 5.2 of the EIS.

Finally, commentors raised concerns about misleading media coverage regarding the selection of the preferred alternative. The Trust is, of course, not responsible for the views or editorial stance of the press, although it has tried to correct erroneous reports of the Trust’s actions. On June 14, 1999, after a number of printed reports incorrectly characterized the identification of the preferred alternative as a final decision, the Trust issued a press release confirming that all alternatives analyzed in the Draft EIS remain viable. The release stated, “Announcement of a preferred alternative land use will facilitate public involvement in the SEIS process. . . . The public and interested parties are invited to submit comments on the preferred alternative or any of the other alternatives described in the draft SEIS until the close of the public comment period. . . . After due consideration of public comment, the Trust will publish a final SEIS.” Because of the confusion generated by



the erroneous media coverage, the Trust extended the public comment period on the Draft EIS for an additional 45 days. For further discussion, refer to Section 5.2 of the FEIS.

In sum, the Trust identified a preferred alternative and a lead candidate to carry out that alternative, and this choice was made in compliance with NEPA. Furthermore, as noted above, the Trust extended the public comment period to ensure that the public was given a chance to comment on the preferred alternative prior to the preparation of the Final EIS.

**7A Consistency with Planning Guidelines [15-2, 18-7, 23-9, 25-2, 33-3, 44-2, 44-4, 44-13, 44-15 through 44-17, 44-26, 44-30, 44-38, 44-44, 47-3, 48-2, 49-5 through 49-7, 61-2, 61-27, 61-59, 61-61]**

Several commentors are unclear as to the purpose of the Planning Guidelines. The intent of the Planning Guidelines is to ensure that a federal undertaking, like the proposed project, is in keeping with the character of the Presidio's National Historic Landmark district. The *Final Planning Guidelines for New Construction in the Letterman Complex*, provided in Appendix B of this Final EIS, provide a number of measures to guide the continuing development of the entire 60-acre Letterman Complex so that this and future Letterman Complex projects will be compatible with the scale, architectural character, and pedestrian-friendly quality of the existing historic setting. Measures for new construction within the 23-acre site include setbacks and height restrictions and provisions for inviting walkways, publicly accessible uses on the ground floor of buildings, careful massing of buildings, and framing of view corridors. Diligent attention to these Planning Guidelines will promote a sensitive integration of any new construction into the Letterman Complex's historic setting. Design Guidelines for new construction, which are now under development and must be submitted for oversight agency review under the Programmatic Agreement to meet the Trust's NHPA obligations, will incorporate the Final Planning Guidelines that have been publicly reviewed and finalized as part of this EIS (a more complete discussion of the relationship of planning and design guidelines to this EIS is set forth in Section 1.4 of the Final EIS).

Some commentors expressed concern that the preferred alternative falls short of the Planning Guidelines. As documented in the EIS, the preferred alternative is largely consistent with the Planning Guidelines, and where there are inconsistencies that constitute an adverse effect, they are identified and analyzed in Section 4.5.8 (Cultural Resources) of the Final EIS. Future planning and design review processes, described above and in Section 1.2 of the Final EIS, will strive for greater compliance with the Planning Guidelines to reduce these effects. The Planning Guidelines are a design tool to be used in the sequential design stages of the proposed project. Because the level of detail found in the Planning Guidelines is substantially greater than that of the preliminary conceptual plans requested of project proponents under the Letterman Complex RFP, the Trust has been working and would continue to work with the development team of the preferred alternative to ensure that the final site plans achieve a high degree of conformity to the Planning Guidelines. Should another alternative come to be preferred, the Trust would similarly work with that team.

One commentor requested an analysis of how each alternative meets the Planning Guidelines. Sections 4.1.8 through 4.5.8 (Cultural Resources) have been revised to respond to this comment. For each alternative, inconsistencies with the Planning Guidelines are described and an assessment of their effects on the historic



setting are analyzed and documented. Text has been added to the sections to further clarify these consequences. As described in mitigation measure CR-1, it is expected that the concept plan for the preferred alternative would be modified through the planning and design process to be more consistent with the Final Planning Guidelines and the Design Guidelines now under development to ensure that new development is in keeping with the character of the historic setting and that adverse effects to the National Historic Landmark are avoided.

Contrary to some commentors' assumptions, the Planning Guidelines are not the decision criteria for selection among alternatives. Rather, they provide guidance such that whatever alternative is chosen, the selected project may be integrated into the Presidio as a whole in a harmonious way. The Trust would continue to work with the development team of the preferred alternative, and ultimately with the team of the selected alternative, to maximize attention to the guidance provided by this document. Those discussions would continue through planning and through design and, indeed, until and during construction itself.

The process the Trust is following adheres to the direction provided in the NEPA Regulations: "Agencies shall integrate the NEPA process with other planning at the earliest possible time to insure that planning and decisions reflect environmental values, to avoid delays later in the process, and to head off potential conflicts" (40 CFR Section 1501.2). The planning process continues, while an EIS under NEPA necessarily captures a snapshot in time in the development of a project. Here the Planning Guidelines achieve a principal function — coming late enough in the evolution of a project to evolve meaningful review, but also making public the direction which the Trust expects the project to take as it approaches construction. This public knowledge of how the Trust envisions the continuing evolution of the proposed project helps ensure that there are no unexpected substantial changes in the project or significant new circumstances or information bearing on it or its impacts warranting supplemental NEPA review. Instead, the expected direction of change is to be in accord with the Planning Guidelines and is a matter of public knowledge.

The Presidio Trust strongly disagrees with some commentors' assertions that reliance on the Planning Guidelines as a mitigation measure is inappropriate. The GMPA EIS (pages 29 and 191) requires preparation of such guidelines to mitigate adverse effects of new construction on the National Historic Landmark. Incorporation of the Planning Guidelines into the Draft EIS (for revisions and publication in the Final EIS) was an effective vehicle to obtain broad public input on the Planning Guidelines. The Final Planning Guidelines in Appendix B will be incorporated into the Design Guidelines, which are now under development and must be submitted to the SHPO for review and comment as part of the section 106 consultation process. The Final Planning Guidelines will therefore be applied and continue to provide direction through the consultation and design review process under the Programmatic Agreement where there will be continuing review of their application by the ACHP, SHPO, NPS, and public after the environmental review process for this action is concluded. The Planning Guidelines have been prepared as a continuing interactive set of "guides" to help shape future actions as built and will serve as guides as the project moves through the process of negotiation, the signing of a lease, or the execution of a development agreement. The Trust's intent is to ensure that the project design and construction conforms as closely as practicable to the Planning and Design Guidelines, recognizing all the while that 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 design and construction is not now or may not in the future be consistent with the Planning and Design Guidelines, these departures have been identified and discussed as potential adverse effects in Section 4 of the EIS.



Finally, one commentor stated that impacts of the Planning Guidelines are not assessed in the EIS. The Trust has considered but identified no impacts that would result from implementation of the Planning Guidelines that have not been adequately analyzed in the EIS. Under Alternatives 2 through 5, replacement construction would be limited to the 23 acres, and no additional new development is expected throughout the remainder of the complex. See master response 4A. Future plans and actions within the balance of the 60-acre complex that would be guided by the Planning Guidelines (such as historic building rehabilitation or restoration of the Tennessee Hollow drainage) would be subject to environmental analysis, as deemed appropriate, when those projects are proposed. Infill construction, as proposed only in Alternative 1, would require an update to the Final Planning Guidelines and the preparation of design guidelines for infill construction in the historic complex (see mitigation CR-2 in the Final EIS). To project beyond those improvements analyzed either in this Final EIS or in the GMPA EIS concept for the Letterman Complex would be speculative and would not therefore require further NEPA review.

**7B Design Review and Future Public Involvement [23-14, 25-2, 33-3, 44-5, 44-13, 44-15, 44-37, 44-38, 49-5 through 49-7, 61-4, 61-15, 65-7, 65-10]**

Commentors raised concerns about the design review process for new construction and the level of public involvement in the process beyond this EIS. Several key points for public input occur during the planning and design process and during agency consultation. The first opportunity for public input on new construction at the Letterman Complex was integrated early into the NEPA process (see Section 1.4.2 of the EIS). The Presidio Trust developed a set of Draft Planning Guidelines, with public input, as a way to address potential adverse effects of new construction in the National Historic Landmark district. The Draft Planning Guidelines were included in the Draft EIS (Appendix B) and received public comment through that review process. To begin development of Design Guidelines, which more specifically address architectural and landscape issues for new construction, the Presidio Trust posted an initial draft on the Presidio Trust's website and made the draft Design Guidelines available for public comment on December 6, 1999. The Trust held a public workshop on the Draft Design Guidelines on December 13, 1999, and received public comment until December 27, 1999. Future similar opportunities for public input into the design will occur at the Conceptual Design phase. In addition, a public briefing at the conclusion of design development will afford an opportunity to understand how public comment on the conceptual design has been incorporated.

The Presidio Trust currently uses a design and construction review process as part of its permit issuance process for building and landscape rehabilitation projects. This review process ensures both code compliance as well as compliance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*. The design review process for new construction at the Letterman Complex will largely follow this design and construction permit review process already in place by the Trust, with the exception of creating more opportunities for public input in the design phase.



**8    *Precedential Effect of the Letterman Project [19-1, 23-4, 23-25 through 23-27, 23-50, 23-73, 47-9]***

A few commentors lamented that the proposed project is unprecedented in the national park system, questioning the basis for the project. For a more complete response as to how and why the Presidio is different from other national parks and why the majority of the Presidio is under the administrative jurisdiction of the Trust rather than the NPS, refer to master response 1A-D and Section 1.1 of the EIS. The basic reorientation was, of course, made by Congress in enacting the Trust Act. That Act is a unique compromise enacted by Congress to protect the natural and cultural values of a magnificent base-now-national park, while making the 1,480-acre facility with 780 buildings in a predominantly urban area financially self-supporting. So unique is the circumstance and setting that the Trust does not believe that the Trust Act or its implementation can be used as precedent for other units of the national park system nationwide.

The proposed project is somewhat unprecedented in the national park system for a number of factors. Prime among these is the GGNRA Act, which designated the military base for transfer to the NPS once the facility was no longer needed by the military, and the Presidio Trust Act, which required that the facilities within the former military base be operated on a financially self-sufficient basis by year 2013. Approximately 650 building sites, structures and objects within the Presidio are listed on the National Register of Historic Places as being properties which contribute to a National Historic Landmark district. No other unit of the national park system approaches this number of useable historic structures. The combination of many useful and historic former military structures, in a natural setting in close proximity to a major urban center, has to a great degree rendered the planning process for the Presidio unique. The Trust does not believe that an analysis of the implications of the proposed project on projects or parks not covered by the unique statutory mandates of the Trust is an appropriate subject for analysis in this EIS.

**9A    *Conflicts of Interest [21-3, 23-37, 23-38, 27-9]***

One commentor asked questions concerning the existence and disclosure of any conflict of interest with respect to the preferred alternative selection process, and asserted without any support that the Trust Board of Directors was subject to improper influence in making its selection. In addition to being bound by ethics laws and regulations governing federal employees, the Board of Directors of the Presidio Trust is also subject to supplementary ethics guidelines consistent with federal laws and regulations concerning ethics, conflicts of interest, and financial disclosure. The Board adopted Supplementary Standards of Conduct for Directors of the Presidio Trust on October 22, 1998 by Board Resolution No. 99-2. No member of the Presidio Trust Board has had at any time any conflict of interest with respect to consideration of Letterman Digital Arts, Ltd. as a potential developer, or identification of the Letterman Digital Arts, Ltd. proposal as the preferred alternative. Although Board member Mary Murphy's law firm lists Lucas Film, Ltd. as one of its clients, there is no current representation of that or any other Lucas-related entity by Mary Murphy's law firm. Although the Trust Board has concluded that there is no conflict of interest for Board member Murphy, she has nonetheless recused herself from any vote concerning the LDA proposal.



**9B Improper Influence** [23-1, 23-39 through 23-41, 23-48 through 23-50, 23-54, 23-57, 23-58, 27-1, 27-9]

One commentor sought to have the EIS list all social, personal, or professional connections or communications between the Trust and the preferred alternative proponents. CEQ regulations direct agencies to exclude such irrelevant material. Rather, an EIS document, which is restricted in length by law, analyzes only the environmental impacts of a proposed action and various alternatives to the action. Consequently, the EIS would not include the requested listing.

The same commentor questioned how the Board was lobbied during the selection process and how the preferred alternative was selected. Pursuant to the Trust's Public Outreach Policy, the Trust Board encourages all forms of public input and the use of the GGNRA Citizens Advisory Commission for formal public comment. The Trust Board considered all public comment received, whether at GGNRA Citizens Advisory Commission or Trust public meetings or in written or oral correspondence to the Trust. Although NEPA does not require hearings in addition to acceptance of written comments, on May 18, June 15, and July 20, 1999 the Trust held public meetings through the GGNRA Citizens Advisory Commission on the Draft EIS at which comments on the Draft EIS were accepted. In addition to formal comments at the hearings, the Trust received letters from the general public during the comment period, most of which favored the Digital Arts Center alternative. Neither the Trust nor the proponent of any alternative has hidden information relevant to the EIS analysis from the public. The preferred alternative was selected by vote of the Trust Board and recorded in Trust Board Resolution No. 99-16.

The same commentor suggested that the Trust Board, by holding public meetings through the GGNRA Citizens Advisory Commission, failed the EIS requirement for adequate public involvement because the Board itself should hold public hearings. On the contrary, the Trust is authorized by law to provide opportunities for public comment through the GGNRA Citizens Advisory Commission (Trust Act Section 104(c)(6)).

**10A Financial Need for the Project** [4-1, 5-9, 6-4, 21-1, 23-14, 33-5, 33-19, 36-1, 44-4, 44-43, 44-58, 46-8, 47-5, 47-6, 53-1, 55-5 through 55-8, 61-2, 61-22]

The proposed project evaluated in this EIS is needed to achieve the mandates of the Presidio Trust Act, most importantly the mandate that the Presidio become financially self-sufficient by 2013, while being managed in accordance with the General Objectives of the GMPA. Consistent with the congressionally required Financial Management Program for the Presidio (a financial forecast detailing how the Trust plans to achieve the Act's self-sufficiency requirement) the proposed project is intended to serve as an economic engine, generating early and significant revenue to pay for capital improvements and historic building rehabilitation that in turn will allow revenue generation at other areas of the Presidio. Section 1.2 of the Final EIS, Underlying Purpose and Need, discusses in detail the need for the proposed project as analyzed in the EIS. In view of this purpose and need, several commentors called for financial information to show how the proposed project supports the need for financial self-sufficiency requirement of the Trust Act.

*The Financial Management Program* – Congress not only set the self-sufficiency requirement, but also required the Trust, among its first official acts, to present to Congress the Trust's plan for achieving the mandate.



Pursuant to the requirements of the Trust Act, by July 8, 1998, the Trust presented to Congress a Financial Management Program (FMP, provided in Appendix E) detailing how the Presidio would become independent of federal appropriations within 15 years after the first meeting of the Trust Board of Directors (i.e., by July 8, 2013). Building upon the GMPA, which was a comprehensive programmatic plan for the Presidio, the FMP was to serve as the budgetary plan for meeting the newly imposed financial self-sufficiency requirements of the Trust Act.

The FMP presents a forecast of replacement reserves and capital and operating costs associated with leasing, maintenance, rehabilitation, repair, and improvement of property within the Trust's administrative jurisdiction at the Presidio. It further projects the recovery of these costs through a combination of near-term federal appropriation, borrowing from the U.S. Treasury, and lease revenues. Using these forecasts and assumptions, the FMP sets forth a declining schedule of appropriations until the date of financial self-sufficiency and demonstrates how, over the 1998 to 2013 time period, the Presidio Trust can complete needed upgrades to buildings, open space, and infrastructure to enable and enhance use of the Presidio as a national park by tenants and park visitors.

With regard to costs, operating the Presidio long term requires maintaining more than 750 buildings, 1,000 acres of open space, roads, utility systems, and all other aspects of maintaining a park and community without access to federal appropriations or taxation as a source of revenue. To support the Presidio long term, the annual cost of operations and replacement reserves is forecasted in the FMP at \$35.7 million (all FMP projections are in 1998 dollars). This cost includes the projected annual operating budget of \$24 million, which is based upon the 1998 NPS budget, with a minimum 20 percent reduction for operating efficiencies expected under the Trust's streamlined authorities. It also includes an annual set-aside of \$11.5 million to build a fund that will pay for long-term capital improvements to both buildings and natural areas.

With respect to revenues, in order to break even by 2013 with a small margin, the FMP forecasts the need for \$36.6 million of annual revenues.<sup>7</sup> The Trust's primary source of ongoing revenue to support this cost is revenue from the lease of residential and non-residential real estate. Lease revenues account for \$35.6 million of the \$36.6 million annual total, and the Letterman project lease is expected to be the single largest non-residential component of the revenue needed to meet the financial self-sufficiency plan of the FMP. With respect to total revenue needed to meet the financial self-sufficiency plan of the FMP, the Letterman project is expected to yield minimum annual ground lease revenue<sup>8</sup> of \$5 million, accounting for one-third of non-residential lease revenues needed, or 14 percent of the total lease revenues.<sup>9</sup> To provide the revenue stream to

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<sup>7</sup> As reflected in Appendix B of the FMP, more than \$36.6 million is needed to achieve self-sufficiency in order to cover the estimated \$5.1 million annual debt service payment through 2027.

<sup>8</sup> Ground leasing is a middle position between the sale of land and leasing of finished building space. The Trust is prohibited by law from selling land and does not have sufficient capital resources to redevelop the Letterman project to the stage of finished buildings. By offering a ground lease, the Trust can offer the right to use a land parcel for a definite length of time and can secure a tenant who is willing to invest the necessary capital to redevelop the site. The ground rent is the annual payment to the Trust for the land value. Land value is determined based upon the income stream that can be generated from the parcel after taking into account the investment required to generate income (e.g., capital and operating costs).

<sup>9</sup> The FMP submitted to Congress is based upon a minimum yield of \$3.5 million from the Letterman Complex. This number reflected a conservative estimate of the potential revenue yield from leasing LAMC and LAIR (Concord Group 1998; Mancini-Mills 1998a). Subsequent market information supported potentially higher yields from the Letterman project (Mancini-Mills 1998b). Accordingly, the Trust set a minimum annual revenue target of \$5 million. This target was validated by market submittals in response to the Trust's Letterman RFQ. The FMP financial forecasts have therefore been revised to reflect this and other valuation updates.



make the capital investments needed to assure the revenue targets in the FMP are met, this revenue stream must start early, phased in over several years, beginning in 2000. Further, the LAMC/LAIR tenant must be financially capable of funding more than \$200 million in capital costs to redevelop the LAMC/LAIR facilities.

Because the FMP's self-sufficiency margin at the end of 15 years is quite small, if lease revenues from the proposed project are not generated in the amount and on the timetable forecast in the FMP, more income would need to be raised elsewhere on the Presidio, placing pressure to collect higher rents on other non-residential uses or to recoup the Letterman Complex shortfall from residential rents to the extent possible – prospects that are impracticable were rents are already set at market rate. In the alternative, the Trust would have to make operating expense cuts that would compromise the long-term sustainability of the Presidio.

*The Letterman Complex as the Presidio's Economic Engine* – In developing the FMP, the Trust used as its starting point the general land use categories of the GMPA and the financial information and studies that were prepared to support the GMPA, including NPS's July 1994 building leasing and financing implementation strategy (NPS 1994f). This supplement to the GMPA set forth NPS's financial strategy for implementing the GMPA, and it identified the Letterman Complex as the priority project at the Presidio. It viewed the LAMC/LAIR facilities, under the market conditions at the time, as the ideal project to fuel capital improvements elsewhere on the Presidio.

To better forecast costs and revenues in response to Congress's FMP command, the Trust took a fresh look at the GMPA leasing and financing strategy by initiating additional financial analysis and newly commissioned consultant studies to evaluate factors related to the newly enacted Trust Act mandates that had not been taken into account by NPS when the GMPA had been finalized (BAE 1998b, Concord Group 1998; Mancini-Mills 1998a and 1998b). For purposes of the FMP cash flow forecasts, these additional studies looked at a range of opportunities available for generating early and substantial revenues, and among other factors evaluated operating costs, potential housing revenues, leasing opportunities, and building rehabilitation and improvements. The information, assumptions, cash flow analyses, and real estate information in these studies formed the basis of and became part of the FMP revenue and cost forecasts for the Presidio as a whole.

In recognition of the importance of the Letterman Complex to the Presidio's self-sufficiency, as acknowledged in the GMPA's building leasing and financing strategy supplement, soon after establishment of the Trust, the Presidio Trust Board of Directors at its October 31, 1997 meeting authorized a study to update the redevelopment potential of the Letterman Complex (Board Resolution 98-3). The Board recognized that the market conditions in the Bay Area had changed drastically from 1994 when NPS negotiated with UCSF, and believed that an updated market analysis was necessary to fully evaluate the Letterman Complex's contribution to the self-sufficiency directive and the other Trust mandates. The resulting January 1998 study concluded that the Letterman Complex would be very competitive in the market, given a scarcity of campus-type locations in San Francisco and the inner Bay Area; that there was a window of opportunity to market the site, given the improving strength of the market; and that a ground lease supporting 900,000 square feet of new construction<sup>10</sup> could generate at least \$3.5 million (Mancini-Mills 1998a). Subsequent market updates assumed a range of \$3.8 million to \$5.7 million for the opportunity (Mancini-Mills 1998b). Therefore, in March 1998, based in part on

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<sup>10</sup> This study assumed the removal of certain non-historic buildings to arrive at the scenario of 900,000 square feet of new construction.



the conclusions of these studies, the Trust adopted a real estate policy that clearly establishes the proposed project as a priority for early implementation (Board Resolution 98-18). It was this early reanalysis of the potential financial contribution of the LAMC/LAIR site that served to update and refine NPS's earlier financial analysis of the Letterman Complex and inform the Trust's July 1998 FMP and subsequent Letterman RFQ.

In developing the FMP, the Trust established financial planning assumptions that provide a rational means of achieving financial self-sufficiency without requiring large capital expenditures, which Congress has declined to authorize, by the Trust. By leasing the LAMC/LAIR site early, as assumed in the GMPA and carried through to the FMP, the Trust can use generated revenues to build an economic base that would allow other Presidio projects to be undertaken, including historic building rehabilitation, open space improvements, and infrastructure upgrades that have limited, if any, revenue-generating potential.<sup>11</sup>

*The FMP Establishes the Letterman Project Parameters* – The FMP served to establish the parameters of the proposed project. These parameters (namely, demolition of LAMC/LAIR and 900,000 square feet of replacement construction) were made part of the Trust's Letterman RFQ and are currently under study in this EIS. In its RFQ, the Trust solicited a project calling for the demolition of the functionally obsolete LAMC/LAIR buildings. Demolition would be followed by redevelopment and use of newly constructed low- to mid-rise, or lower-profile mixed-use buildings totaling approximately 900,000 square feet and some infrastructure improvements within the 23-acre site within the Letterman Complex. The Presidio Trust, as the approval agency for the proposed project, would enter into a long-term ground lease and development agreement with a master tenant/development team to build and occupy the approximately 900,000 square feet of new replacement space on 23 of the 60 acres within the complex (Figure 3 in the EIS). Congress's command to establish the financial forecasts of the FMP, therefore, set not only the expected financial return but also indirectly set the square footage needed for the proposed project.

*900,000 Square Feet of Replacement Construction* – In order to yield the FMP's forecasted revenue for the Letterman Complex, a project of 900,000 square feet is needed (Mancini-Mills 1998a, Concord Group 1998). Valuation analyses for this size of development showed that revenue yields could range, depending upon a variety of financial variables, from \$3.8 million to \$5.7 million annually, an amount which under the FMP was needed to fuel the financial investment badly needed to address other building and infrastructure improvements throughout the Presidio (Mancini-Mills 1998b). Because the Trust could not be sure until the market responded to an actual proposal whether the market would yield the projected income or where within this range revenue yields would actually fall, it was considered financially imprudent to base the FMP on, or to later solicit, a smaller-scale project (refer to master response 10B for discussion of smaller-scale projects).

With respect to the 900,000 square feet, the FMP assumed the majority of the square footage would derive from demolition and replacement of both LAMC and LAIR. The failed NPS leasing initiative, marketing analysis, and the Trust Act requirements supported this FMP assumption. At the time of the 1994 NPS Letterman RFQ

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<sup>11</sup> The Trust's leasing experience since the 1998 FMP was presented to Congress has validated the potential strength of the Letterman project as the economic foundation that will enable the Trust to move forward with more challenging historic rehabilitation projects. As among all of its leasing proposals to date, the Trust has received the strongest economic response to its Letterman leasing initiative. Several potential Letterman tenants made strong rent offers, allowing the Trust to then distinguish between offers based upon non-economic programmatic factors. Other leasing initiatives have involved complex historic rehabilitation transactions causing some to fail and resulting in constrained revenue generation potential for others.



and prior to finalizing the GMPA, LAIR was perceived to have a ready market to continue in its research use and the GMPA proposed it for reuse. The failed negotiations with UCSF and the State DHS, and the new unavailability of the City's DPH created real uncertainty with the possibility of finding a user for the existing facilities. Further, reuse barriers existed because of the high cost of rehabilitating LAMC to acceptable seismic standards for reuse as a laboratory and research facility and layout and other functional obsolescence problems at LAIR (BAR 1993). The GMPA acknowledged this uncertainty by identifying the Letterman Complex, as compared to other Presidio planning areas, as an area where change in use could occur through new replacement construction if existing buildings and improvements do not meet essential program and management needs.<sup>12</sup> When these factors were considered with the updated leasing analysis showing a substantially expanded Bay Area market for campus-setting developments and with the Trust Act requirement to consider reasonable competition in leasing, the FMP assumption to demolish both LAMC and LAIR was seen as rational for FMP forecasting purposes.

***10B Effect of Reducing or Eliminating Revenue from the Letterman Project [4-1, 5-9, 44-4, 44-39, 44-43, 44-58, 46-8, 47-5, 53-1, 55-5 through 55-7, 61-2, 61-22]***

Several commentors asked for scenarios on development of the Presidio without revenue from the proposed project or with reduced Letterman Complex revenue. To cover operating costs and build replacement reserves, the Trust needs to establish a base income of \$36.6 million annually, as documented in the FMP. If less income were generated at the Letterman Complex, the Trust would need to generate more income elsewhere in the Presidio. Increasing revenue demands from other areas would challenge the goals of achieving a full range of housing, of rehabilitating historic buildings especially at the Main Post and Fort Scott, and of enhancing the natural areas of the park. Because of the opportunity it presents, unique at the Presidio, to demolish non-historic, outdated, and costly-to-maintain building space and to construct in its place more compatible, useful and cost-effective space, the proposed project offers the best opportunity for the Trust to achieve the income needed to support other programs and rehabilitation projects at the Presidio (see master response 10A).

Eliminating revenue from the Letterman Complex would result in at least a \$5 million ongoing annual shortfall, approximately 14 percent of total revenues. It is not feasible to make up lost Letterman Complex revenue by increasing rents on other non-residential uses at Fort Scott, the Main Post or Public Health Service Hospital. Annual rents for these projects would need to increase by \$4.24 per square foot, which is above the projected market rates assumed in the FMP, and the projects would have to be implemented all at once in the 2000 to 2001 time period. Neither condition is possible. Moreover, capital improvements would have to be funded and completed before lease revenues could commence. Given that most of these projects involve a historic rehabilitation effort, the additional revenue burden would compromise project feasibility or price the buildings out of the market for rehabilitated buildings.

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<sup>12</sup> Updated market analysis and failed leasing initiatives since the GMPA was finalized has shown that retaining both or even one of the LAMC/LAIR facilities is inconsistent with meeting essential program and management needs and is incompatible with maximizing revenues from the project (Mancini-Mills 1998a).



Neither is it feasible to make up lost Letterman Complex revenue by increasing residential rents. If the Letterman Complex shortfall were recouped from residential leasing, average monthly rents would need to increase by \$276 per unit (\$5 million divided by 1,598 units), making most rents above market rates. The FMP was predicated on market-rate rents for most units. A limited number of units were assumed at a below-market rent to help accommodate a full range of workforce housing. The Trust considers these assumptions rational for purposes of the FMP forecast.

Several commentors suggested that, if the development at the Letterman Complex were reduced, the Trust would receive a proportionate reduction in ground rent. However, 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.

The Trust issued the RFQ for 900,000 square feet of building space with a revenue target of about \$5 million, understanding that market studies supported a range between \$3.8 million and \$5.7 million. It was rational for the Trust to offer a 900,000-square-foot opportunity without any reduction in scale because of the uncertainty about whether the offering would actually yield income within the forecasted range. To have offered less would have been to take a chance that the needed income could not be attained. The market responses to the RFQ and later RFP validated the aggressive revenue target and ensured that the Trust can meet the need for early and sufficient revenue from the project.

The net result of the analysis of reducing or eliminating revenue from the Letterman Complex is that, with less revenue, the Presidio Trust would be significantly challenged to achieve its aim of achieving financial self-sufficiency. Lower Letterman revenues would either force rent increases on other projects, which are likely to affect market acceptance, or necessitate capital improvement and operating expense cuts that would compromise the quality and long-run sustainability of the Presidio. The FMP forecasts a narrow margin between revenues and expenditures at self-sufficiency. If the Trust is able to exceed its revenue targets on early leasing efforts, it creates a needed cushion for potential economic downturns, unexpected expenses, or physical and programmatic enhancements that are not currently forecast.

***11 Derivation of Proposed Building Area [21-5, 23-20, 27-7, 33-1, 33-5, 55-9, 61-12, 61-20, 61-22]***

Several commentors asked how the 900,000-square-foot building area total was determined for the 23-acre site and how this relates to the overall building area of the 60-acre Letterman Complex. The proposed 900,000 square feet of new replacement construction approximates buildings on the 23-acre site. Within the 60-acre Letterman Complex, seven buildings totaling 23,000 square feet have been demolished in the complex by the NPS since 1994. This is consistent with the GMPA, which identifies an additional 13,000 square feet of non-historic building space that could be removed in the future. With these removals and the square footage derived by demolishing LAMC, LAIR (approximately 807,000 square feet), and two adjacent non-historic support



structures (33,000 square feet), the total square footage of the proposed project is approximately 876,000. For purposes of soliciting development proposals, the Trust approximated this square footage by soliciting development proposals of 900,000 square feet of new replacement construction while pledging that in the end the amount of occupied square footage at the Letterman Complex would not exceed the 1.3 million square feet total studied in the GMPA EIS. Table C-1 of the EIS identifies buildings proposed for demolition under each alternative.

Alternative 1, which closely reflects the GMPA vision for the LAMC/LAIR site, allowed for the retention of LAIR but the demolition of the former hospital (LAMC) and replacement construction of up to 503,000 square feet. Alternatives 2 through 5 assume demolition of LAIR and additional building demolition as described above, with total replacement construction up to 900,000 square feet. Because this is a departure from the GMPA and EIS of 1994, this EIS has been prepared to analyze the impacts of the new alternatives currently under consideration. Please refer to Section 1 (Purpose and Need), Sections 4.1.1 through 4.6.1 (Consistency with Approved Plans and Policies) and Appendix A (Revised Environmental Screening Form) for a further explanation about the relationship between the 1994 GMPA and EIS and this document. Also, refer to master responses 1D, 2A, and 6A.

The project as proposed will have a number of beneficial effects consistent with the GMPA. Consistent with the GMPA land use concept for the Presidio, replacement of existing square footage in already developed areas would allow for the restoration of open space elsewhere, such as along the Tennessee Hollow corridor on the western edge of the Letterman Complex. Furthermore, the total square footage for the Letterman Complex would not exceed the existing 1.3 million square feet and the height of new buildings would be equal to or less than that of nearby structures with a maximum height of 60 feet. The density, therefore, of new development as proposed on the 23-acre site would be more spread out than what currently exists in order to adhere to the proposed height restrictions. This would achieve a more compatible, lower height design that would improve the visual integrity of the complex and minimize impacts on scenic viewing. New construction would be designed and sited to be compatible with the Presidio's National Historic Landmark status and adhere as set forth in mitigation measure CR-1 to the Planning Guidelines for the Letterman Complex (Appendix B).

One commentor 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*, 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.

One commentor has asked about future expansion possibilities for the preferred alternative. Replacement construction on the 23-acre site as proposed in Alternatives 2 through 5 would foreclose the opportunity for construction of new infill buildings within the adjacent historic hospital complex as was called for in the



GMPA. Therefore, no additional new construction beyond the proposed 900,000 square feet in Alternative 5 is expected. Under all alternatives analyzed, the total square footage for the entire 60-acre Letterman Complex would not exceed 1.3 million square feet. See also master response 4A.

## ***12 Reliance on Mitigation Measures [44-39, 44-53, 44-54, 44-58, 46-11]***

Several commentors seem to have misinterpreted the Presidio Trust's intentions with respect to the mitigation measures; "masking" of impacts was by no means intended. The EIS discusses the environmental impacts of the alternatives *before* mitigation, mitigation measures that could decrease impacts, and any adverse environmental effects that cannot be avoided *after* mitigation.<sup>13</sup> Thus, the EIS lays out not only the full range of environmental impacts, but also the full spectrum of appropriate mitigation. Commentors criticized the Planning Guidelines (mitigation measure CR-1), the Storm Water Pollution Prevention Plan (mitigation measure TS-1), and a detailed landscaping plan (mitigation measure NP-1) as examples of measures that may not serve to fully mitigate identified adverse effects. On the contrary, incorporation of the Planning Guidelines into the project, which would include design changes to reduce impacts on the historic setting, is in full accordance with CEQ NEPA Regulations (Sections 1505.2, 1505.3, and 1508.20). The reliance on the Planning Guidelines as a mitigation is fully discussed in Section 1.2 of the FEIS and in master response 7.

Formulating a Storm Water Pollution Prevention Plan (SWPPP) as requested by one commentor is not possible given the early development stage of the project. It is more appropriate to defer development of a SWPPP until prior to disturbing a site, since this approach provides the flexibility necessary to establish best management practices that can effectively address source control of pollutants during changing construction activities. Also, as a SWPPP specifies compliance with applicable water quality standards, this mitigation would ensure that discharges would not adversely impact water resources. Therefore, a SWPPP, although not presently prepared can serve to effectively mitigate potential pollution from construction activity.

Finally, the detailed landscaping plan was included as a mitigation measure to maximize the beneficial impact on native plant communities as discussed in Section P of Appendix A of the EIS.

While implementation of mitigation measures are not mandatory under the law, NEPA requires that all relevant, reasonable measures that could improve the project are to be identified (Forty Questions No. 19a in CEQ 1981). The Presidio Trust has done so. Furthermore, the Presidio Trust is fully committed to implementing all mitigation measures discussed in Section 4.7 as they appear in the text of the Final EIS, including incorporation into the project of the Planning Guidelines, SWPPP, and detailed landscaping plan. The Record of Decision rather than the EIS, however, is the appropriate vehicle to indicate that these measures will be adopted and enforced by the Presidio Trust.

One commentor also stated that many mitigation measures were missing or unquantified. The Presidio Trust is neither aware of any mitigation measures which are absent in the EIS, nor of any requirement that these

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<sup>13</sup> Please note that the Presidio Trust did not indicate in the EIS, as inferred by one commentor, that water and traffic impacts would be "severe." Unavoidable adverse effects of the alternatives are discussed in Sections 4.1.12 through 4.6.12 (Unavoidable Adverse Effects) and include air quality, noise, and housing impacts.



measures be quantified.<sup>14</sup> An EIS is only required to discuss all practicable means to avoid impacts. Given the Trust's commitment to sustainability, it is highly unlikely that the water conservation measures called for in mitigation measure WS-2, *Water Supply- and Demand-Side Solution to Reduce Cumulative Impacts*, would be opposed, unenforced, or otherwise unsuccessful. Likewise, the reference to use of a webpage (devoted to transportation alternatives) to reduce parking demand must be viewed in its total context and is included as part of a package of TDM actions. Its listing in Section 4.5.7.6 in the Draft EIS was only provided to reveal a full range of appropriate mitigation, and it has been clarified in the same section in the Final EIS. The commentor is correct in stating that the Trust identifies mitigation measures that are outside its jurisdiction. As encouraged by the CEQ NEPA regulations, this will serve to alert those agencies that can implement these extra measures, and the Presidio Trust will encourage them to do so. However, the Presidio Trust could not commit to these measures outside of its responsibility as part of its Record of Decision.

**13    *Impact on Water Supply* [32-20, 36-3, 36-4, 44-39, 44-46, 44-54, 44-58, 46-12, 55-22, 55-23, 55-25, 55-26, 55-28 through 55-31, 56-16, 61-56]**

Several commentors stated that the general water conservation practices and the use of an unspecified alternative water supply called for in mitigation measure WS-2 may not be effective in resolving potential water supply problems at the Presidio. They further suggested onsite reclamation as an alternative way to meet the conservation goals articulated in the EIS. In order to respond to this suggestion and to manage waste in an environmentally responsible manner as contemplated in the General Objectives of the GMPA, the Presidio Trust would establish a reclaimed water system that would resolve park-wide potential water supply problems (see mitigation measure WT-1, *Water Reclamation Plant to Reduce Cumulative Impacts*, in Section 4.7 of the Final EIS). The system would include a water reclamation plant that is expected to be online concurrent with development of the 23-acre site. The water reclamation plant would be capable of reclaiming and treating approximately 200,000 gallons per day (gpd) of wastewater. This would be equivalent to 278 percent of the maximum sanitary flows of 78,000 gpd from the new development at the Letterman Complex as noted in Section G.2, Wastewater Treatment and Disposal in Appendix A of the Final EIS. The plant would produce tertiary treated water that would comply 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. The reclaimed water would be made available to supply irrigation water for use in the Presidio and to lower overflow volumes of wastewater discharged to the city's combined sewer system.

Other commentors requested that the water savings resulting from implementing the water supply- and demand-side solutions to reduce park-wide impacts be quantified. Implementation of the water conservation practices in mitigation measure WS-2, *Water Supply- and Demand-Side Solution to Reduce Cumulative Impacts*, would save approximately 120,000 gpd of water (see potential water savings estimates in the mitigation measure). This water savings, combined with the 200,000 gpd of water saved through the proposed reclaimed water system, would yield approximately 320,000 gpd of water, which would more than compensate for the net cumulative peak shortfall of 286,000 gpd in typical and drier years with Alternative 5 (see Table 12 in Final EIS).

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<sup>14</sup> Although quantification is not required, the Presidio Trust has done so when possible (see master response 13).



Finally, one commentor suggested that the measures in WS-2 themselves may lead to adverse impacts, and these should be quantified as well. It is highly unlikely that there would be any significant adverse impacts of proposed mitigation. The direct impacts of water conservation are beneficial and include: 1) the prevention of future water shortages; 2) the protection of the environment; and 3) cost savings on water bills. The direct impacts of water reclamation are beneficial and include: 1) the reduction in demand on high-quality potable water (by providing reclaimed water for nonpotable applications); 2) the provision of a reliable water source not subject to drought restrictions; 3) a reduction in pollutants that otherwise would be discharged into San Francisco Bay; and 4) support for the Presidio Trust’s commitment to efficient use of water. It should be noted that reclaimed water use is strictly regulated to avoid public health risks. As far back as 1896, state health authorities began regulating wastewater use for the irrigation of specified crops. Today, water reclamation criteria established by the California Department of Health Services specify requirements for reclaimed water by category of use. Title 22 of the California Administrative Code contains standards for water quality, monitoring, reporting, and treatment reliability. These criteria are enforced by the Regional Water Quality Control Board to ensure that reclaimed water projects are safe, reliable, and protective of public health.

**14   *Impact of Increased Sewage Flows* [32-21, 36-6, 44-39, 44-46, 46-12, 46-13, 55-10 through 55-17, 55-30, 55-31]**

Several commentors, including the City and County of San Francisco, noted that while the city has sufficient dry weather capacity to accept maximum flows from the project (estimated at 78,000 gpd), new development would contribute incrementally to overflow volumes during major storm events. The public’s concern of untreated wastewater being discharged into the bay through emergency overflows into the storm drain system was previously discussed in the GMPA EIS (page 106). The GMPA EIS concluded that the provision of city services for wastewater treatment and disposal due to park-wide development including the Letterman Complex would not burden its wastewater system because the city would be reimbursed through sewage fees (pages 170 and 171). Consequently, no mitigation measures were identified. However, at this time, in order to respond to these concerns, the Presidio Trust is proposing a water reclamation system that would substantially lower overflow volumes of wastewater discharged to the city’s combined sewer system during wet weather events (see mitigation measure WT-1 and master response 13). In addition, the Presidio Trust is currently eliminating the park’s sanitary sewer line cross-connects where storm water may discharge into the city’s combined system (the park maintains separate sanitary and storm sewer systems). Re-piping of all cross-connects would also reduce overflow volumes attributable to storm water flows.

**15   *Impact on Drainage, Watershed, and Water Quality* [21-9, 36-7, 44-25, 44-41, 44-54, 44-58, 47-8, 61-30, 61-31, 61-34]**

*General* – Several commentors raised concerns over the impact of the project on drainage, watersheds, and water quality. The EIS includes various discussions of hydrologic impacts and corresponding mitigation measures to protect adjacent wetlands (Crissy Field), the stream drainage (Tennessee Hollow), and San Francisco Bay. Those discussions appear in Section D (Water Quality), Section G.3 (Storm Drainage), Section O (Wetlands and Stream Drainages), and Section S (Topography and Soils) in Appendix A of the EIS, and the



mitigation measures are identified again in Section 4.7 of the Final EIS. It should be noted, as discussed in Section D of Appendix A, that the impact topic of water quality was adequately analyzed on pages 106 and 107 of the Presidio GMPA EIS and previously dismissed from further consideration on page 137. It was concluded that proposed improvements would have only minimal effects on water quality in San Francisco Bay. Since preparation of the GMPA EIS, this conclusion has been further supported by:

- Hydrologic and hydraulic analysis conducted for the Letterman Complex subbasins which identified operational procedures and storm water system improvements that would be implemented to reduce pollutant sources and pollutant concentrations in storm water runoff (Dames & Moore 1994);
- NPS staff who evaluated the quality and anticipated the quantity of storm water that would be discharged into the Crissy Field restored wetlands from the 23-acre site (Brian Ullensvang, NPS Remediation Specialist, pers. comm.); and
- California Department of Water Resources staff who reviewed the preliminary analysis for the project and determined that it would not impact bay water quality, and they therefore have no concerns (California Department of Water Resources 1999).

*Estimate of Storm Water Volume* – Several commentors suggested that the EIS should estimate the volume of storm water collected and reused, and the volume discharged to the bay. In response to this suggestion, as noted in Section D, Water Quality in Appendix A of the EIS, the project would shift the majority of land cover from pavement to landscaped or pervious area. This shift would significantly reduce the amount of storm-water runoff and the amount of pollutants that eventually would reach the bay. Currently the 23-acre site is about 70 percent paving, hardscape, or building. Under the preferred alternative, this would be reduced to 40 percent, with the remaining 60 percent becoming pervious landscaped areas. In addition, the alternative would incorporate rainfall harvesting, capturing storm-water runoff during the winter from roofs and hardscape areas to be stored and used for summer irrigation. This would further reduce the amount of impervious surface runoff that generally contains significantly higher pollutant loads than pervious landscaped areas.

The resulting average annual runoff for Alternative 5, based on 22 inches of annual rainfall, would be 570,000 cubic feet (cf) of runoff from pervious surfaces and 510,000 cf from landscaped surfaces. The proposed rainfall harvesting system would capture 400,000 of the 570,000 cf from pervious surfaces so the net runoff would be 170,000 cf from this cover type, giving a total average annual runoff to the bay of 680,000 cf. The 23-acre site currently produces a total runoff of about 1,300,000 cf, or about twice the planned site runoff. In addition, 80 percent of this runoff is from impervious surfaces, mostly paving.

*Impact on Tennessee Hollow Riparian Corridor and Crissy Field Wetlands* – Several commentors requested that the EIS confirm whether storm-water drainage would be directed to Tennessee Hollow or Crissy Field. According to Brian Ullensvang, NPS Remediation Specialist, and Doug Kern with the Urban Watershed Project, all storm-water outflow from the 23-acre site would drain to the Crissy Field wetlands. Therefore, as discussed in Section O, Wetlands and Stream Drainages within Appendix A of the EIS, because storm water from the 23-acre site would not discharge into the same storm drain system that receives runoff from Tennessee Hollow and Alternatives 2 through 5 would limit new construction to the 23 acres, proposed development



activities would have no effect on the proposed riparian corridor. A large area of the 23-acre site is comprised of a relatively impermeable surface (asphalt and concrete) and has a high runoff coefficient. Alternatives 2 through 5 would remove much of this asphalt and concrete and replace it with landscaping to allow greater infiltration. These alternatives would result in a lower runoff coefficient and, therefore, less runoff that would discharge into the storm drain system that connects to the Crissy Field restored wetlands.

*Pollutants in Bay Discharges* – Several commentors requested that the EIS specify projected concentrations of pollutants in bay discharges. Two major factors from the project’s design would result in the reduction of non-point source pollutants discharged to the bay. First, since the preferred alternative would shift land cover from paving to landscaped areas, the total amount of runoff would be less. This would result in a smaller pollutant load to the bay. Second, since generally the concentration of pollutants from paved areas is significantly higher than from landscaped areas, the concentration levels of pollutants would also be less, further reducing the pollutant load to the bay. Reduction in pollutant loads from the various land cover types can be used to determine the resulting reduction in pollutant mass from the 23-acre site. Suspended solids, biological oxygen demand, and total nitrogen are three of the main pollutants of concern for non-point source pollution. The total mass load reduction for all three pollutants would be approximately 60 percent on an annual basis.

*Monitoring and Maintenance of Lagoon* – Alternative 5 calls for the use of a portion of the lagoon as a biofilter. One commentor asked how this area would be monitored and maintained. The lagoon would be used to assist in the reduction of pollutants from impacts such as waterfowl use and runoff loading. Biofiltering by aquatic plants, aeration and biofilter management measures (such as periodic reedgrass harvesting to neutralize the potential buildup of pollutants) is proposed in order to ensure a high level of water quality. The Storm Water Pollution Prevention Plan, as discussed in mitigation measure TS-1, would include a monitoring program and reporting requirements for site inspections, reports and certifications, and sampling and analysis to ensure that at all times storm-water discharges would not cause or contribute to an exceedance of any applicable water quality standards contained in the Statewide Water Quality Control Plan and/or the San Francisco Bay Region Basin Plan.

## **16   *Impact on Natural Resources* [14-14, 40-1, 44-24, 44-39, 44-41, 44-45, 44-58, 46-10, 47-8, 53-2, 53-4, 55-3]**

*General* – Several commentors stated that the EIS should include a discussion of impacts on natural resources, including resident avian species that inhabit the site’s trees. NEPA requires a lead agency to identify and eliminate from detailed study the issues which are not significant or which have been covered by prior environmental review, narrowing the discussion of these issues in the EIS to a brief presentation of why they would not have a significant effect on the environment or providing a reference to their coverage elsewhere (CEQ NEPA Regulation Section 1501.7(a)(3)). To satisfy this requirement, the EIS focuses on significant environmental impacts. The main body of the EIS provides detailed information only for those specific resources and significant impacts that were not adequately examined in the GMPA EIS as determined in the tiering analysis in Appendix A of the EIS. Effects on the area’s natural resources were dismissed from further analysis based on site-specific information and analyses included in the appendix. Nevertheless, the commentor is referred to Section Q, Wildlife in Appendix A of the EIS for an assessment of the impacts of the project on



the trees that provide the highest value wildlife habitat within the 23-acre site, and the wildlife that are known to have been attracted to these trees (based on observed bird diversity and use). Consultation with wildlife resource specialists from the National Park Service (NPS 1998b), and surveys of vegetation and wildlife conducted for the Presidio's *Vegetation Management Plan* (VMP) and Environmental Assessment provided the requisite information for the analysis of impacts (and avoided the need to unnecessarily duplicate data already available). In fact, the Presidio Trust used the data and knowledge of the NPS to discover how to avoid adverse impacts on the natural environment early on to control visitor use, to protect native trees and valuable wildlife habitat at the site, and to design the best possible project from a natural resources point of view. U.S. Fish and Wildlife Service staff who reviewed the Draft EIS indicated that their concerns were adequately addressed and that they had no further comment (Presidio Trust 1999d).

*Additional Information on Mature Trees* – Several commentors requested that the EIS provide additional information on mature trees within the 23-acre site. In response to this request, a reconnaissance level site survey was conducted under the direction of the Presidio Trust to identify the numbers and species of trees, and their general condition and age.<sup>15</sup> Based on the results of the survey, which are now incorporated into Section P, Native Plant Communities of Appendix A of the EIS, replacement construction under Alternatives 2 through 5 could require the removal of up to 317 of the 408 mature trees within the 23-acre site. Future planning would take into account opportunities for preserving existing mature trees; salvaging trees suitable for replanting to the extent feasible; remedial actions to improve vigor and construction survivability of preserved and replanted trees; and the addition/replacement of trees during building landscape renovation. Removal of these trees is considered a less-than-significant impact because:

- none of the trees to be removed qualify as heritage landmark trees<sup>16</sup> (Nick Weeks, NPS Senior Landscape Architect, pers. comm.);
- none of the trees to be removed are native species;<sup>17</sup>
- as discussed above, trees providing the most valuable wildlife habitat would be preserved and protected in place (see Section Q, Wildlife in Appendix A). These trees represent approximately 22 percent of the total trees to be preserved within the site;
- many of the trees to be removed are restricted or conditionally prohibited from use within designed landscapes within the Presidio because of existing and potential problems (disease, pest, and fire potential; invasive spread into native plant communities; short life-span; view-blocking tree height; or inappropriate soil or climatic conditions). These trees include the Monterey pines, pittosporums, liquidambar, and acacias which represent approximately 27 percent of the total trees to be removed;
- many of the trees to be removed have strikingly different characteristics from historic species, would not maintain the visual integrity of the landscape which contributes to the National Historic Landmark District status, and are therefore considered unsuitable in historic landscapes. These trees include the Australian bush

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<sup>15</sup> A copy of the *Tree Report for the Letterman Complex* prepared by HortScience, Inc. (2000) for the Presidio Trust is available for review at the Presidio Trust library.

<sup>16</sup> Defined in the draft VMP as trees that have historic value, are outstanding botanical specimens, display unique traits, or serve a particular aesthetic function in the landscape.

<sup>17</sup> Defined in the draft VMP as species that were most likely found on the Presidio prior to European settlement. Species native to California, but not native locally to the Presidio, are considered nonnative species.



cherry, lemon bottlebrush, Forrest's silver fir, atlas cedar, yew pine, and fern pine which represent approximately 4 percent of the total trees to be removed; and

- other trees more suitable to supplement historically planted species within the Presidio to better address the goals and objectives of the Vegetation Management Plan (NPS 1999b) would be planted as part of the landscaping plan for the non-historic building landscape renovation as permitted under the Vegetation Management Plan (NPS 1999b, page 59).

### ***17 Impact on Quality of Life of Neighbors [6-4, 15-3, 23-56, 33-9, 55-4]***

Several commentors questioned whether the Presidio Trust considered the impacts of the project on the surrounding residential neighborhood. Long-term effects on the surrounding neighborhoods are assessed in the traffic and transportation systems, air quality, and noise discussions for each alternative in Section 4, Environmental Consequences, of the EIS. A construction traffic management plan would be developed to further specify routes, times of operation, and other factors to mitigate construction impacts on neighbors both inside and outside of the park. The overall supply of parking would be monitored to accommodate onsite parking demand, encourage transit use and other non-automobile modes of travel, and discourage parking in the adjacent neighborhood. During demolition and construction, contractors and other equipment operators would be required to comply with the terms of provisions equivalent to the standards in the San Francisco Noise Ordinance. To further reduce noise impacts, appropriate barriers would be placed at a distance of 250 feet between sensitive receptors and construction sites and stationary equipment such as compressors and crushers.

In addition, Planning Guidelines in Appendix B of the EIS describe the relationship of the site to the residential character of the adjacent neighborhood and provide measures, including setbacks, building height limitations and vegetative buffers, to minimize impacts on neighbors outside the Presidio wall. The project provides for adequate buffers, visual screening and public access to limit the impact of new development on the neighborhood. A network of public open spaces and pedestrian connections to enhance public enjoyment of the site, and strong pedestrian and bicycle connections would be created to link the Letterman Complex to adjacent neighborhoods. Scenic and historic views into and out of the complex would be preserved and enhanced, particularly those views into the site from Lombard and Chestnut streets. The Lyon Street edge would include a 30-foot setback from the historic stone boundary wall to ensure that buildings along this edge would be compatible in scale with the residential character of existing buildings along Lyon Street. With a 30-foot setback, new buildings on the 23-acre site would be separated from the existing residential buildings on the east edge of Lyon Street by approximately 120 feet. This compares favorably to the typical width of 70 to 80 feet between opposing building façades in the nearby neighborhood. Finally, the existing historic tree windrow would be maintained and supplemented by additional planting to visually screen the new buildings from neighbors along Lombard Street. A pedestrian gate on axis with Chestnut Street would be created to also allow for improved pedestrian access into the 23-acre site.



**18 *New Direct Access to the Letterman Complex from Richardson Avenue [4-2, 5-3, 6-3, 11-2, 11-3, 12-10, 12-11, 13-4, 13-5, 13-7, 13-8, 21-7, 21-8, 36-8, 36-10, 36-11, 39-2, 44-39, 44-58, 46-7, 55-36, 55-37, 55-39, 55-40, 55-43 through 55-47, 61-40, 61-45, 61-46]***

In order to provide direct vehicular access to the 23-acre site, the Trust has proposed two new intersections on Richardson Avenue (U.S. Highway 101). The new intersections involve reconfiguration of the intersection of Richardson Avenue/Lyon Street/Gorgas Avenue, including relocation of an existing traffic signal at Francisco Street/Richardson Avenue/Lyon Street and elimination of cross-street vehicle flow on Francisco Street across Richardson Avenue. To advance this project, a highway and traffic design firm under the direction of the Presidio Trust would prepare a project study report (PSR) for Caltrans review. Alternatives to the design shown in the EIS would be identified and studied as part of the Caltrans PSR process. Neighborhood input and coordination would be an important component of the PSR.

Some commentors questioned the need for new access and why two new intersections were required. The new intersections on Richardson Avenue are needed primarily because vehicular capacity to the Letterman Complex is severely constrained at the intersection of Lombard Street and Richardson Avenue, which is the only access to the Letterman Complex from downtown San Francisco and the East Bay. The left-turn pocket that allows vehicles to continue westbound on Lombard Street into the park can accommodate only four queuing vehicles. This pocket is already at or over capacity in peak hours, blocking westbound traffic on Lombard Street. Development on the site and overall park development will further exacerbate this condition. The 1994 GMPA EIS noted that this intersection falls to unacceptably low levels of service by the year 2010 (p. 181). In addition, the new intersections allow traffic from the 23-acre site to access U.S. Highway 101 toward the Golden Gate Bridge directly, a movement not currently available.

Installation of two traffic signals on Richardson Avenue would allow westbound left-turns into the park to be accommodated at the southernmost intersection, and left-turns out of the Presidio to be accommodated at the northernmost intersection. Traffic analysis performed for the EIS by its traffic consultant, Wilbur Smith Associates, indicated that a three-phase signal allowing all movements at one of the intersections would not work during the morning peak hour when traffic coming from the Golden Gate Bridge to Lombard Street is very heavy. Consequently, two signals, each having two phases, are proposed. The southern intersection would allow westbound left-turning traffic into the site, and the northern intersection would accommodate left-turns out of the Presidio toward the Golden Gate Bridge. Providing two-phase signals would minimize the amount of time that through movements on Richardson Avenue would be stopped, thereby minimizing delay to the through traffic.

Some residents in the vicinity of the intersections were concerned about potential traffic and parking impacts on their homes. Eliminating the through movement on Francisco Street would affect some access routes to residences on Richardson Avenue depending on which side of Richardson Avenue they are located on and from which direction they are accessed. The principal change would involve the use of Chestnut Street instead of Francisco Street, a very minor difference. Reconfiguration of the intersection of Richardson Avenue/Lyon Street/Gorgas Avenue would not restrict access to residential driveways. On-street parking would not be



removed, and therefore the buffer area currently provided by the parked vehicles (between the driveways and the vehicular traffic on Richardson Avenue) would be maintained.

In addition to residences in the area, concern was expressed about access to the Exploratorium and the Palace of Fine Arts, directly across Richardson Avenue from the 23-acre site. In fact, the proposed new intersections on Richardson Avenue would improve access to the Exploratorium by accommodating turns in and out of the complex that currently cannot be made directly from U.S. Highway 101: eastbound into the site and eastbound leaving the site.

Some commentors expressed concern about traffic flow on U.S. Highway 101. The traffic impact analysis conducted for the six alternatives evaluated the traffic operating conditions on Richardson Avenue with the reconfigured signalized intersection of Richardson Avenue/Lyon Street/Gorgas Avenue and the new signalized intersection of Richardson Avenue/Gorgas Avenue access road. The results of the analysis are presented in Table 18 of the EIS.

The proposed intersection design allows for the same number of through lanes (three per direction) currently available on Richardson Avenue. It was analyzed under both p.m. peak-hour and a.m. peak-hour conditions. The a.m. peak-hour was determined to be the most critical time period for this particular intersection because the large volume of eastbound through traffic in the morning conflicts with the proposed left-turn movements from Gorgas Avenue to westbound Richardson Avenue and from westbound Richardson Avenue into the Presidio. Providing a phase of the proposed signal that allows for the westbound left-turn movement would cause queues to develop for the eastbound traffic flow. The length of time allotted for the westbound left-turn movement would be minimized to maximize the amount of green light time allotted to the eastbound through movement.

The distance between the point at which Richardson Avenue diverges from Doyle Drive and the location of the proposed new intersection is approximately 1,400 feet. The queue length from the northernmost intersection of the two-intersection configuration is estimated to be 841 feet in length on average during the year 2010 a.m. peak-hour worst condition and would reach a maximum length of 916 feet. Thus, there would be a minimum distance of 484 feet between the back of the queue and point at which Richardson Avenue diverges from Doyle Drive.

Eastbound traffic on Doyle Drive and Richardson Avenue traveling at 50 mph would need approximately 427 feet to stop before reaching the back of the queue from the new intersection. Therefore, traffic exiting onto Richardson Avenue would not have to begin decelerating until exiting the traffic stream on Doyle Drive. A “Signal Ahead – Be Prepared To Stop” warning sign would need to be placed about 57 feet beyond the point where traffic bound for Richardson Avenue would diverge from Doyle Drive.

Some commentors expressed concern about coordinating external access into the 23-acre site with circulation on the site, and designing intersections along Gorgas Avenue to prevent potential backup of incoming traffic onto U.S. Highway 101. The Trust will be coordinating the two relevant projects: 1) the Caltrans PSR for external access, and 2) planning and design of the 23-acre site. The design of Gorgas Avenue, as well as its intersection with Lyon Street/Richardson Avenue and entry into the Letterman Complex, will be reviewed by



the Presidio Trust as part of its design review process to ensure that the traffic on the internal roadway network does not impact traffic operations external to the site, and that traffic associated with the Letterman Complex does not affect other users of the Presidio.

Although the intersections along Gorgas Avenue were not analyzed directly in the EIS, they will be coordinated to work with the intersections along Richardson Avenue to prevent potential backups. Traffic entering Gorgas Avenue from Richardson Avenue at the new intersection would have a free right turn onto Gorgas Avenue westbound, while traffic on Gorgas Avenue would be stop-sign controlled. A similar free left turn would be provided from Gorgas Avenue westbound into the planned garage entrance for the Letterman Complex development. This network of stop signs and free turns would ensure that traffic entering and exiting via the new intersections would not impact Richardson Avenue operations. Traffic engineering principles and the Planning Guidelines will be applied in the detailed design of the internal roadway network, and will consider the needs of adjacent uses, such as the Thoreau Center for Sustainability. For example, separate turn pockets could be provided along Gorgas Avenue to ensure that Letterman Complex traffic does not impact through traffic on Gorgas Avenue, and signals on Gorgas Avenue would be coordinated with those on Richardson Avenue. The two new intersections on Richardson Avenue would provide sufficient access for the volume of traffic expected to use the Gorgas Avenue Gate to access the 23-acre site as well as other parts of the Presidio.

The new proposed intersections would require minor changes in pedestrian access to Golden Gate Transit and MUNI bus stops. The transit stop for buses traveling westbound on Richardson Avenue would be relocated to a point immediately north of Lyon Street, as shown on Figure 15. Pedestrians walking between this bus stop and the Presidio would cross at the crosswalk on the north side of Lyon Street. The bus stop for the eastbound direction of Richardson Avenue would remain at its current location, but pedestrians crossing Richardson Avenue to this bus stop would cross at the new intersection at Lyon Street rather than at Francisco Street as they do currently.

Some commentors inquired regarding the funding and approval process for the intersections. No funding source is currently identified for this project. There is currently no agreement with Caltrans on the proposed intersection. Such an agreement would come upon satisfactory resolution of the PSR and permitting process.

**19   *Impact of Transportation Demand Management on Traffic Volumes [2-8, 5-7, 23-14, 25-6, 36-17, 39-5, 55-35, 55-42, 56-21, 61-39, 61-50, 62-2, 62-6, 62-8]***

A number of commentors raised questions about the impact of the new development within the Letterman Complex and other planned development on traffic within and adjacent to the Presidio. Some of these commentors have expressed concern that it may not be possible to achieve the Trust's goal of making the Presidio a sustainable national park by 2013 without a decrease in dependence on the automobile. Mitigation measures TR-1 through TR-3 would mitigate the traffic impacts of Alternatives 1 through 5 to a less-than-significant level. In addition, the EIS identified Transportation Demand Management (TDM) strategies that would further reduce the reliance on the automobile and would encourage non-automobile modes of transportation (Table D-12 in Appendix D of the Final EIS summarizes the strategies for all alternatives).



Using the GMPA as a starting point, the Presidio Trust is developing a TDM program for the Presidio, which would establish actions to be taken by the Presidio Trust and all park tenants and occupants to improve transit, pedestrian and bicycle conditions, and reduce automobile usage by all tenants, occupants and visitors. The Presidio Trust would require all tenants and occupants to participate in the TDM program for the Presidio, including:

- Carpool/vanpool programs
- Periodic monitoring of traffic volume and mode choice among Presidio residents and employees
- Transit and ridesharing information disseminated on kiosks within the park, the Presidio Trust’s website, and employee orientation programs
- Parking management program
- Secure bicycle parking
- Mandatory event-specific TDM programs for all special events
- Onsite sale of transit passes
- Clean-fuel shuttle bus serving the Letterman Complex and the remainder of the Main Post
- A transit hub in the Letterman Complex/Main Post area that would facilitate transfers between public transit buses and the Presidio shuttle buses
- Express bus service to regional transit connection programs (i.e., BART and the Transbay Terminal).

Program performance would be monitored through means consistent with the TDM program, including traffic counts and user surveys.

Each of the proponents in Alternatives 2 through 5 proposed specific elements of the TDM program for the 23-acre site. The TDM elements proposed by the proponent of the preferred alternative included the following (see Table D-12 for a complete listing):

- Onsite Transportation Coordinator
- Guaranteed-ride-home program
- Webpage devoted to transportation alternatives
- Flex-time policies
- Telecommuting policies
- Onsite support services
- Preferential carpool/vanpool parking.



The Letterman Complex lease would include provisions requiring the tenant to participate in the TDM program. The tenant's Transportation Coordinator would assist the Presidio Trust's Transportation Manager to maximize participation in the TDM program.

Some commentors questioned how TDM was accounted for in determining automobile mode share calculations. Determining the overall effectiveness of TDM measures in reducing single-occupant-vehicle trips is complex, and depends on the elements of each TDM program, the degree to which the program is promoted, and the environment in which it is placed. The Draft EIS analysis assumes the same 70 percent automobile mode share analyzed in the GMPA. The GMPA calculations considered implementation of a limited number of TDM and transit improvements: constrained parking, extension of the MUNI 41/45 line to the Main Post, and an internal shuttle bus. Furthermore, the Presidio Gate volumes forecasted for the year 2010 in the GMPA were also used to represent year 2010 conditions in the EIS. The TDM plan is assumed to be in place under each of the alternatives. Alternative 5 TDM elements include strategies that the proponent has successfully utilized in TDM programs at their current worksites to exceed trip reduction requirements. LDA's overall TDM strategy concept relies on providing a comprehensive set of positive rewards (incentives) such as promotional events, rideshare incentives, many onsite support services, secure bicycle parking, and preferential car/vanpool parking strategies. Should Alternative 5 be selected, the Presidio Trust would monitor and evaluate LDA's TDM program, as detailed in mitigation measure TR-8, to ensure that the required mode split (70 percent vehicle use maximum and 1.4 average vehicle ridership (AVR) minimum) is achieved. Following the annual monitoring, TDM strategies that are found to be ineffective or underutilized would be improved or replaced with other strategies. The Presidio Trust will work closely with the proponent to insure successful implementation of the TDM programs.

Some commentors requested specific information on TDM measures for the preferred alternative, reasons for selection of TDM strategies and the estimated amount of vehicular traffic that could be eliminated through application of these strategies. Alternative 5 TDM elements include strategies that the proponent has successfully utilized in TDM programs at their current worksites to exceed trip reduction requirements and emphasizes a comprehensive set of positive rewards (incentives) such as promotional events, rideshare incentives, many onsite support services, secure bicycle parking, and preferential car/vanpool parking.

Based on current experience, the proponent of the preferred alternative has estimated that the Letterman Complex automobile mode share would be between 80 and 85 percent and the vehicle occupancy rate would be 1.2 persons per vehicle without a successful TDM program in place (Letterman Digital Arts Ltd. 2000). These figures translate to between 6,850 and 7,280 weekday daily vehicle trips. With implementation of all TDM measures outlined for Alternative 5 in Table D-12 of the Final EIS (including the proponent's employees occupying 300 units of Presidio housing) it is estimated that the mode split would achieve the required automobile mode share of 70 percent for external trips, 50 percent for internal trips and 1.4 persons per vehicle occupancy rate. These figures translate to 4,910 weekday daily vehicle trips with the successful TDM program in place. The TDM program removes between 28 and 33 percent of the weekday daily vehicle trips that could be generated by Alternative 5.



**20   *Vehicle Parking on the Site*** [3-3, 3-5, 4-2, 5-1, 5-13, 13-1, 15-1, 22-1, 36-14, 41-11, 41-17, 44-35, 44-39, 44-49, 44-51, 44-58, 46-3, 46-4, 46-6, 55-33, 58-2, 61-42, 61-50, 62-2]

The Presidio Trust is addressing parking needs throughout the park in a Parking Management Study that is underway and is expected to present findings and undergo environmental review in 2000. The purpose of the study is to establish a comprehensive program to accommodate parking needs within the park while balancing the need to minimize the number of parking spaces to be built.

To calculate parking demands, the Trust applied the Draft EIS methodology (see pages 2 through 9 in Wilbur Smith Associates 1999) to the five development alternatives and used standard San Francisco parking demand guidelines (San Francisco Guidelines for Environmental Review). The mode split (70 percent of external and 50 percent of resident employees by automobile) and average automobile occupancy (1.4 persons per automobile) assumptions used in the EIS traffic analysis were used to estimate employee automobiles and each was assigned a parking space. Visitor spaces were assumed to turn over at 6.5 cars/day.

The Trust received comments concerning the uniformity of analysis of the parking demand calculation across all alternatives. In response to these comments, the parking demand calculation for the preferred alternative was revised from the figure provided in the Draft EIS. Specifically, the long-term parking demand calculation for most alternatives was based upon 900,000 gross square feet, whereas for Alternative 5, the demand calculation assumed only 769,000 square feet. When parking demand for Alternative 5 is recalculated using a consistent assumption for gross square footage, Alternative 5 generates a revised parking demand of 1,440 spaces. This revised demand calculation has been incorporated into the Final EIS. The 1,440-space demand can be accommodated within the 1,530 spaces proposed to be constructed under Alternative 5. The difference between the 1,530 spaces proposed and the 1,440-space demand would allow for daily variation in demand and circulation efficiencies.

To ensure that the provision of onsite parking does not encourage driving, the Trust would require that the Digital Arts Center fully participate in the TDM program including mitigation monitoring and other measures specified in mitigation measure TR-8.

A number of commentors were concerned about the impact of the new development within the Letterman Complex on parking availability in the adjacent neighborhoods. Parking supply is sufficient to accommodate demand in the preferred alternative so there would be no significant impact on adjacent neighborhood parking. For alternatives where forecast demand exceeds supply, the Trust would require proponents to institute TDM measures or increase parking supply so that demand is satisfied on the 23-acre site. In addition, the current neighborhood parking sticker program is effective in preventing tenant parking in the neighborhoods. The Trust is coordinating with the city's study of neighborhood parking in Marina and Cow Hollow neighborhoods to ensure that potential concerns are addressed. Further, the Trust's Parking Management Study will contain recommendations to minimize impacts on adjacent neighborhoods of employee and visitor parking within the Letterman Complex. Following input from neighborhood organizations, the Presidio Trust will work with the San Francisco Department of Parking and Traffic to implement and enforce recommendations.



**21    *Decision to Develop before Doyle Drive [6-4, 10-2, 13-8, 23-67, 23-68, 39-1, 55-41]***

Several commentors suggested that the project should not be developed before Doyle Drive is rebuilt. Because the Presidio Trust is charged by Congress to become financially self-sufficient by 2013, and because development at the Letterman Complex is critical to achieving self-sufficiency, the Trust cannot wait until the Doyle Drive planning process is completed to move forward with work at the Letterman Complex. Planning for reconstruction of Doyle Drive has recently restarted under the direction of the San Francisco County Transportation Authority (SFCTA) in cooperation with Caltrans. The current schedule calls for completion of environmental analysis and documentation in 18 months, which would be June 2001. There currently is no schedule for design or construction, and construction funding is not in place. Consequently, the EIS assumes that the Letterman Complex implementation would occur a number of years prior to reconstruction of Doyle Drive.

The Presidio Trust will continue to coordinate with the SFTCA and Caltrans on the Doyle Drive Study so that the adopted plan for Doyle Drive would be compatible with proposed circulation within the 23-acre site.

The preferred alternative would not preclude previously identified alternatives for Doyle Drive. However, major changes in the current site plan would be required to accommodate the Gorgas Avenue alignment that was identified in prior studies for Doyle Drive. The Gorgas Avenue alignment was never supported by the NPS (see GMPA, page 50) and is unlikely to be supported by the Presidio Trust. However, it appears likely to be considered, at least initially, as an alternative in the upcoming Doyle Drive Project EIS.

**22    *Effect on Existing Intersections, Traffic Circulation, and Historic Roads [6-3, 13-8 through 13-11, 13-4, 44-52, 49-5, 61-68, 61-70, 61-71, 61-73]***

Commentors asked what impacts the proposed alternatives would have on the existing roads, intersections and traffic circulation in the Letterman Complex. Commentors also raised concerns that awkward or difficult intersections or roadway changes were evident in Alternatives 2 through 5. In an attempt to address this, additional text has been added to Sections 4.2.8.5, 4.3.8.5, and 4.4.8.5 (Effects Due to Intersection and Roadway Improvements) to discuss the effect due to intersections and roadway improvements.

Questions have been raised about road networks shown in the alternatives and how these would impact the historic streetscapes at the Letterman Complex. The historic layout of the Letterman Complex street system is considered to be an important characteristic of the site's overall cultural landscape, and would be retained and rehabilitated as much as possible while meeting contemporary needs. Individual road corridors are identified as contributing to the National Historic Landmark and would be retained without changes that would adversely affect their historic character. Comments about potentially awkward intersections, interference with existing traffic and parking patterns, and their impact on existing tenants of the Letterman Complex are noted. One of the results of the design review process would be to create an efficient road network for the entire 60-acre complex. The effects that the preferred alternative's design would have on the historic streetscapes and existing traffic patterns of Torney, General Kennedy, and O'Reilly avenues and Edie Road would be duly observed to minimize adverse effects both on the historic resource and on the circulation of traffic.



One commentor asked that additional analysis be performed to address each intersection shown in each alternative, in addition to those analyzed in the EIS (as shown in Figures 15, 16, and 17). The intersections analyzed in the EIS are those most likely to be affected by traffic generated by proposed development at the Letterman Complex. Other roadways and intersections internal to the 23-acre site vary by alternative and are described in each alternative. They have not been analyzed within the EIS because they are not designed to the level required for detailed traffic impact analysis (e.g., number of traffic lanes, turn pockets, intersection control). The detailed design of roads and intersections which result from this undertaking would be reviewed and approved by the Presidio Trust as part of the design review process to ensure that an adequate level of service would be maintained .

It has also been noted that traffic generated by construction vehicles could have an adverse effect on the surrounding area during construction. Proposed routes for construction vehicles are shown in Figure 19 and discussed in Section 4.1.7.6 of the EIS. A construction traffic management plan as discussed in mitigation measure TR-5, *Construction Traffic Management Plan* would be developed to further specify routes, times of operation, and other factors to mitigate construction impacts on neighbors both inside and outside the park.

**23   *Effect on Historic Setting* [13-9 through 13-13, 33-4, 33-9, 44-26, 44-29, 44-30, 44-32, 44-52, 49-5, 61-15, 61-26, 61-29, 61-68, 61-70, 61-71, 61-73]**

Several commentors have questioned the effects that Alternatives 2 through 5 would have on the existing historic setting of the Letterman Complex to the north and west of the 23-acre site, and their effects on the residential neighborhood to the east. In an attempt to address this, additional analysis has been added in Sections 4.1.8.1 through 4.5.8.1 to analyze each alternative's effect on the historic setting.

Commentors have noted that Alternatives 2 through 5 would construct 900,000 square feet of construction on the 23-acre site, and suggest this would create an adverse effect on the National Historic Landmark setting. The analysis in the EIS has determined that through careful design and siting, the new construction would actually enhance the historic setting. It would employ a contextual approach to architecture and site planning to create a development more compatible with the historic Letterman Complex than the existing LAMC and LAIR. In contrast to the current centralized building layout, replacement buildings and landscaped areas would be spread across the 23 acres in a layout that is closer to historic patterns of development at the Letterman Complex. By removing the 10-story, 163-foot Letterman tower and restricting replacement construction to 60 feet in height, and by providing view and circulation corridors through the site, the Palace of Fine Arts would once again be a dominant feature for the site, and views into the site from surrounding neighborhoods would be improved. By creating a circulation network that allows people to move through and across the site in both the east/west and the north/south direction, better connections to the rest of the 60-acre complex would be achieved, thus unifying what is currently a disjointed site. Restoring visual order to the site and reducing the now more than 8 acres of surface parking would improve the scenic qualities of the site. If the existing concrete structures are removed and replaced by buildings that use a palette of materials derived from precedents found elsewhere in the Presidio, the new buildings would be more compatible with the National Historic Landmark district than the current LAMC/LAIR facilities.



*Impact on O'Reilly Avenue* – It has been pointed out that most of the alternatives shown in the EIS do not contain an O'Reilly Commons as recommended in the Planning Guidelines, and this may create an adverse effect on the historic setting. To address this, additional text has been added in Sections 4.1.8 through 4.5.8 (Cultural Resources) to analyze the effects of new construction for each alternative. The Planning Guidelines introduced the concept of the O'Reilly Commons as a buffer zone between new construction and the row of adjacent historic structures. Additional text has been added to the Planning Guidelines to define the desired width of the O'Reilly Commons. The objective behind the buffer zone is to minimize any adverse impact that new construction might have on the historic structures on O'Reilly Avenue. There are several ways to ensure that new construction would be compatible with these historic buildings, and the buffer zone is one of several solutions that can be employed to achieve this. Compatible massing and modulation of new building forms along O'Reilly Avenue, as well as the permeability of this built edge, are issues that would be carefully reviewed during design development to ensure consistency with the objectives of the Planning Guidelines. Connections, both visual and physical, from the adjacent historic hospital complex to the 23-acre site are an important objective for integrating new replacement construction into the entire 60-acre complex. Text has also been provided in Sections 4.1.8 through 4.5.8 (Cultural Resources) to provide additional analyses of how each alternative establishes important visual and physical connections, and areas have been identified that would be further considered during design review.

*Impact on Gorgas Avenue* – Alternatives 1 through 5 include reconfigured Richardson Avenue/Gorgas Avenue intersections that allow northbound and southbound Richardson Avenue traffic to make a left turn onto Gorgas Avenue, and allows left turns from Gorgas Avenue onto Richardson Avenue for northbound traffic at a new intersection created between buildings 1152 and 1160. The proposed one-way exit from Gorgas Avenue would be located between existing historic buildings. However, the proposed break in the row of historic buildings to accommodate this new road would be strategically located between two similar but different clusters of historic buildings. The cluster closest to the Gorgas Avenue Gate, buildings 1151 and 1152, date from World War II, while the warehouse structures (1160s) date from World War I. There is also a break in the streetscape's rhythm between these two clusters.

The effects of proposed intersection improvements on adjacent historic properties, as well as the National Historic Landmark district, are analyzed in Sections 4.1.8.3, 4.2.8.5 through 4.5.8.5, and 4.6.8.3 of the EIS. For Alternatives 2 through 5, the EIS concluded that although there would be an adverse effect on the individual properties, there would not be an adverse effect on the overall streetscape or National Historic Landmark district. The introduction of a passage between the two clusters was determined not to be a significant impact on the overall industrial streetscape setting. In addition to the analysis included in the EIS, a Project Study Report would be prepared by Caltrans for the redesign of these intersections and any further assessment of effects triggered by design refinement would be conducted as part of that process.

Concern was expressed that traffic along Gorgas Avenue would increase over the current levels and that there would be impacts on users of these historic buildings due to new traffic. The reconfigured eastern intersection at the Gorgas Avenue Gate would be no closer to building 1151 than the current exit from Richardson Avenue is to this building and would thus not significantly change conditions. Furthermore, this would not impact the buildings but may restrict pedestrian access to the YMCA from areas south of Gorgas Avenue. The Trust



would work with the YMCA and the selected development team to design safe pedestrian access across Gorgas Avenue as part of the site planning process.

Commentors pointed out that several of the alternatives did not construct a strong built edge along Gorgas Avenue as recommended in the Planning Guidelines (Figure B-19). Changes have been made to the figure to clarify the extent to which a strong built edge is desirable. The new graphic shows that a strong built edge would be recommended on portions of Gorgas Avenue, but not as a continuous edge. It is felt that respecting the industrial character of the streetscape, and providing uses that are active and urban as recommended in the Planning Guidelines, can be achieved without creating a continuous built edge.

**24   *Impact on Visual Resources* [23-70, 33-9, 44-29, 44-30, 44-39, 44-45, 47-8, 49-5, 61-4, 61-15, 61-16, 61-63, 61-74]**

Several commentors raised concerns about adverse impacts on scenic views. The EIS includes analysis and discussions of the visual impacts of the project. The EIS discusses and analyzes the unique characteristics of the 23-acre site in Section X, Visual Resources, in Appendix A of the EIS. That discussion notes that, as seen from the Lombard Gate, the 23-acre site, as it currently exists, is not high in scenic quality, being dominated by a 8-acre parking lot and two non-historic buildings (LAMC and LAIR) that contrast sharply with and dominate their surroundings. Both discussions determine that new adverse visual impacts may result due to replacement construction, and recommend additional analysis, design guidelines and building height restrictions to help minimize these impacts. The recommended additional analyses have been prepared in accordance with the scope decided upon in the tiering analysis in Appendix A as recommended in the GMPA EIS, and are provided in Sections 4.1.8.4, 4.2.8.6 through 4.5.8.6, and 4.6.8.4 (Visual Impacts) of the EIS. Furthermore, Design Guidelines that incorporate the Final Planning Guidelines in this FEIS and that have been made a requirement of the Programmatic Agreement (see Appendix F of the Final EIS), would further guide the architectural design of the preferred alternative. Mitigation measure VR-2, *Height of Replacement Construction*, in Section 4 of the EIS would restrict the height of replacement construction to that of nearby structures with a maximum allowable height not to exceed 60 feet. Finally, as discussed in the text of the Final EIS and in master response 23, re-establishment and enhancement of historic view corridors would have a beneficial effect on the visual and historic setting.

Several commentors requested that visual simulations be included in the Final EIS for each of the alternatives to depict before and after conditions and to aid in the analysis on the visual quality and scenic resources. Visual simulations of the various alternatives are not included in the Final EIS, as they are not required under NEPA. The use of appropriate graphics, while sometimes helpful, is not mandatory (CEQ NEPA Regulations Section 1502.8). Here, however, graphics to illustrate the visual impacts for each alternative have been added to the Final EIS in Section 4, Environmental Consequences (Figures 20 through 24), as well as more detailed analysis to address the concerns raised. It is anticipated that visual simulations would be utilized during the planning and design process to ensure that the project's massing and scale would be compatible with the historic and visual setting. The recommendation to include photographs of the historic view corridors, both before and after implementation of each alternative, is not included in this Final EIS, although text describing the historic view corridors is provided in Section 4 (Environmental Consequences), as mentioned above. This type of visual



analysis (visual simulations and comparative photographs) would be considered in the subsequent planning and design review process to ensure the proposed project’s visual compatibility with the historic setting and the Planning Guidelines.

With regard to comments about impacts of the preferred alternative on scenic and historic view corridors, Section 4.5.8.6 has been added, which analyzes the impact this alternative has on views, and Figure 24 has been added to illustrate this discussion. The analysis concludes that direct east-west views across from O’Reilly Avenue would be blocked at Torney Avenue and Edie Road, but the existing historic view corridor at Thornburg Road would be retained. Views to O’Reilly Avenue would not be obstructed from other points within the site, such as from building 558. North-facing views toward the Palace of Fine Arts would be created at two points between buildings where new view corridors would be created.

**25 *Impact on Visitor Experience and Public Access* [13-13, 16-1, 18-5, 22-2, 23-44, 23-45, 23-79, 24-2, 24-3, 25-2 through 25-4, 33-2, 33-3, 33-8, 33-11, 44-17 through 44-22, 44-36, 49-7, 65-9]**

Several commentors expressed concern that the effects of the proposed undertaking on park visitors had not been adequately analyzed. In response to this concern, new sections have been added to the Final EIS to address this issue. Please refer to Sections 2.3.3 through 2.8.3 (Activities and Programs), Section 3.10.6 (Visitor Experience) within the Affected Environment, and Sections 4.1.8.5, 4.2.8.7 through 4.5.8.7, and 4.6.8.5 (Effect on Visitor Experience) for additional analyses on the subject. The analyses conclude that each of the alternatives would have a beneficial effect on the visitor experience. For example, the preferred alternative’s 7-acre Great Lawn would be a key public amenity for both active and passive recreation in a campus-like setting that would include a water feature, promenade, and a public café, two coffee bars, and restroom facilities nearby. A group of screening/meeting rooms at the main visitor entrance would be offered for community use. A digital arts training institute for study in computer graphics, an internship program for college students, and an educational program for middle school and high school students would also be provided. In addition, an outreach coordinator would work with other Presidio tenants to develop collaborative and joint service programs.

The 23-acre site would be an integral part of the larger Letterman Complex, which would serve as one of many areas throughout the Presidio which would “tell the story” of the Presidio in support of the five interpretive themes identified in the GMPA. An overall beneficial effect on the visitor experience would occur through actions such as the rehabilitation of building 558 as a visitor information center, the introduction of three information/orientation kiosks, the incorporation of interpretive information about the complex in public lobby spaces, and interpretive displays incorporated into the landscape at key spots. These improvements would increase public access and visitor opportunities considerably over what exists today for visitors.

Some commentors have asked how the preferred alternative would meet the Planning Guidelines recommendation to “showcase and interpret” the history of the Letterman Complex and relate to other Presidio themes. The proponent of the preferred alternative, as a provider of digital arts and other technologies, has unique skills which would be put to use by the NPS and the Trust, especially by drawing on their “story-telling” abilities, to develop interpretive opportunities.



Several commentors state that the preferred alternative offers few public amenities, and does not provide an adequately prominent public service component. Others asserted that the preferred alternative offers fewer public amenities than some of the other alternatives. It should be noted that in all alternatives, the primary uses of the buildings are institutional, office and residential, which are not by their nature public. In the case of Alternative 1, its main function is a laboratory, whose facilities would be used predominantly by staff, visiting researchers, and special program participants. Several commentors have pointed out that Alternatives 2, 3 and 4, as mixed-use developments, include retail, institutional, and residential uses that would attract a broader mix of people to the 23-acre site. The preferred alternative, like the GMPA Alternative, is not a mixed-use development, and would attract a single-purpose user group. However, the preferred alternative would offer public amenities and services as discussed above.

Some commentors have asked about the policy of public access to buildings under the preferred alternative while others have stated that parkland is being closed off to the public. In fact, under the preferred alternative, the policy for public access to buildings would be the same policy that applies to all Presidio tenants. Public areas, such as building lobbies or spaces containing public amenities, would be open to the public. Spaces intended for occupancy by employees and residential units would not be public. Current Presidio tenants, as well as those who would occupy the buildings under the preferred alternative, are entitled to privacy in their business areas. On the other hand, the preferred alternative proposal would provide a significant public exterior space (the 7-acre Great Lawn), which is a substantial increase over present conditions. It is expected that employees of the digital arts center, other park tenants, area neighbors, and park visitors would use this space. Improving pedestrian access to the Great Lawn from the adjacent historic hospital complex and the rest of the Presidio would be addressed during the design development to make it easier to enter the Great Lawn from its western edge.

The impacts that this undertaking would have on pedestrians, hikers and bicyclists has been questioned by several commentors. To help address this, Sections 4.1.7.4 through 4.5.7.4 (Impacts on Pedestrian and Bicycle Facilities) within the Final EIS include additional text to analyze each alternative's site circulation. This is also now addressed in Appendix B, Planning Guidelines, Section 3.6.2.B, Pedestrian, Bicycle and Vehicular Access. Suggested circulation routes show a clear bicycle and pedestrian network throughout the Letterman Complex. In addition to this section, frequent references are made in the Planning Guidelines to a "pedestrian-friendly" environment. The exact layout of bike and pedestrian circulation routes, and the development of pedestrian-oriented areas, would be further evaluated as the preferred alternative undergoes design review.



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MASTER RESPONSES

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INDIVIDUALS WHO SUBMITTED THE ELECTRONIC FORM LETTER  
ORIGINALLY PREPARED BY THE NATIONAL PARKS AND CONSERVATION  
ASSOCIATION (LISTED IN ORDER OF DATE RECEIVED)

- |     |                                  |      |                           |
|-----|----------------------------------|------|---------------------------|
| 1.  | Robert Rutkowski                 | 51.  | Scott Bonner              |
| 2.  | David A. Wilcox, Jr.             | 52.  | Ms. Misako E. Hill        |
| 3.  | Mr. & Mrs. R. C. Jones           | 53.  | Tammy Tsao Tsao           |
| 4.  | James Schinnerer                 | 54.  | Brian Williams            |
| 5.  | Dr. Andrew C. Millard            | 55.  | Lou Meyer                 |
| 6.  | Catha J. Loomis                  | 56.  | Jonathan Pearlman         |
| 7.  | Abby Winston                     | 57.  | Mr. Stefan A. Lasiewski   |
| 8.  | Fern and Daniel Riley and Family | 58.  | Jesse Osmer               |
| 9.  | Elizabeth Pape                   | 59.  | Amy Stoddard              |
| 10. | Jesse Counterman                 | 60.  | Michael Leppitsch         |
| 11. | Beth Carman                      | 61.  | Mrs. Kristianna T. Hamann |
| 12. | Joan Gambill                     | 62.  | Ms. Giovanna M. Chelser   |
| 13. | Constantina Economou             | 63.  | Ocie Hudson               |
| 14. | Richard Spotts                   | 64.  | John Piekarski            |
| 15. | Miranda Lovelace                 | 65.  | Ansje Miller              |
| 16. | Marsha W. Van Every              | 66.  | Judith Silverstein        |
| 17. | Jeffrey L. Kunkel                | 67.  | Mark Ostrov               |
| 18. | Lisa C. Price and Julie Brandlen | 68.  | James Wade                |
| 19. | Gerald Orcholowski               | 69.  | John Link                 |
| 20. | George Bond                      | 70.  | Kristin Guild             |
| 21. | Mark Swoiskin, M.D.              | 71.  | William Dietrich          |
| 22. | Joyce Silvernail                 | 72.  | Tiffany Renee             |
| 23. | Naseer Mohamed                   | 73.  | Stefan Schoenhacker       |
| 24. | Greg Raschke                     | 74.  | Michael E. Lawshe         |
| 25. | Robin Johnson                    | 75.  | Laura Bellini             |
| 26. | Bill Parish                      | 76.  | Miss Thais G. Nye         |
| 27. | Jennifer Abel                    | 77.  | Dr. Alexander R. Laszlo   |
| 28. | Todd J. Marse                    | 78.  | Roland Vollmann           |
| 29. | Steven Aderhold                  | 79.  | Ray Hix                   |
| 30. | Cheryl L. Vallone                | 80.  | Craig Bredeson            |
| 31. | Jessea Greenman                  | 81.  | Ywon Won                  |
| 32. | Clyde Everton                    | 82.  | John Woods                |
| 33. | Ingrid Nagy                      | 83.  | Kenneth Copeland          |
| 34. | Tina Horowitz                    | 84.  | Marilyn Dinger            |
| 35. | Seneca J. Klassen                | 85.  | Lois K. Solomon           |
| 36. | Jennifer Brightman               | 86.  | Dennis Lenz               |
| 37. | Alicia C. Ushijima               | 87.  | Louise Leff               |
| 38. | Craig A. Hibberd                 | 88.  | Erica Linson              |
| 39. | Lisa Gartland, Ph.D.             | 89.  | David Tucker              |
| 40. | Janet Michaelson                 | 90.  | Kim A. Wallace            |
| 41. | Sara Ellis                       | 91.  | Lisa Lee                  |
| 42. | Erin Wilson                      | 92.  | Richard Saretsky          |
| 43. | Kevin Starr, MD                  | 93.  | Matt Harray               |
| 44. | Joshua Karliner                  | 94.  | George Elfie Ballis       |
| 45. | Robert K. Zinn                   | 95.  | Laura Lane                |
| 46. | Philippe Leupin                  | 96.  | Aundrea Margason          |
| 47. | Ms. Barbara Blackie              | 97.  | Donna Chelman             |
| 48. | Liane Salgado                    | 98.  | Jennifer Bartholomew      |
| 49. | John Sniegocki                   | 99.  | Elizabeth Hopp            |
| 50. | Cari Morin                       | 100. | David A. Wilcox, Jr.      |

