

## 1. PURPOSE AND NEED

The Trust is proposing to update the 1994 General Management Plan Amendment (GMPA) for the portion of the Presidio transferred to the Trust's jurisdiction in 1998. This Chapter provides background information and specifies the underlying purpose and need for this action.

### 1.1 SCOPE AND TYPE OF EIS

The GMPA is the foundation that guides the Trust's planning and decision-making. The GMPA's importance is reinforced by both the Trust Act and Trust policy. The Trust Act directs the Trust to manage Area B in accordance with the GGNRA Act purposes and the "general objectives" of the GMPA, the latter were defined in Trust Board Resolution 99-11 ("General Objectives"). The Presidio Trust Management Plan (PTMP) is intended to provide an updated land use policy framework for Area B of the Presidio wholly consistent with the GMPA's General Objectives, and which retains and builds on the GMPA's policies and principles. Since the time the GMPA was adopted and the Presidio Trust Act was enacted, key land use and financial conditions have changed. The PTMP is needed to take into account the new Trust Act requirements, conditions that have changed since the GMPA was adopted, new policies and management approaches, and to build in a measure of flexibility not contemplated in the GMPA. Once adopted, the PTMP will be the plan that the Trust looks to in making future management and implementation decisions in Area B, consistent with the purposes of the GGNRA Act and the General Objectives of the GMPA. The GMPA will remain unaltered as the plan for NPS' management of Area A of the Presidio.

This EIS evaluates six alternatives, and one variant of the Final Plan in response to public comments on the Draft EIS. These alternatives are being considered for the PTMP and include: the No Action Alternative (GMPA 2000), Final Plan, Final Plan Variant, Resource Consolidation, Sustainable Community, Cultural Destination, and Minimum Management Alternatives. In accordance with Title 40 of the Code of Federal Regulations (CFR) Section 1502.4, the EIS tiers from and supplements the GMPA EIS and considers the environmental effects of proposed changes to the GMPA under each alternative. It also tiers from the Letterman Complex EIS prepared earlier by

the Trust. The Trust prepared the Environmental Screening Form (see Appendix A) to focus the EIS on issues relevant to the proposed changes.

Given the Trust's reliance on the GMPA as the foundation guiding the Trust, an updated plan is not a legal requirement. The Trust has undertaken the proposed plan update and associated EIS voluntarily as matter of policy and good governance to clarify the Trust's approach to conditions that have changed since the GMPA was adopted, and for the other reasons articulated in this chapter.

As with the GMPA and GMPA EIS, the proposed PTMP and PTMP EIS are broad, programmatic-level documents. Rather than providing an exact blueprint for Area B, the PTMP proposes a land use policy framework, including principles governing the care and management of its varied resources, preferred uses, and programs and activities that are appropriate in this national park setting. The EIS analyzes potential impacts of those concepts as they compare to the baseline No Action Alternative (GMPA 2000).

Adoption of PTMP would not constitute a commitment to any specific development projects, construction schedules, or funding priorities, but instead would establish an updated land use policy framework to guide future Trust actions. More detailed and site-specific, district-level, and/or issue-oriented plans will be developed in the future based upon the direction established in the Final Plan, and will provide additional opportunities for public involvement. Some individual projects that are consistent with PTMP could proceed immediately, likely without need of environmental review beyond the PTMP EIS. At this time, it is anticipated that these projects would primarily include (1) cultural programs and special events; (2) long-term leases involving no new construction or demolition of historic resources, where uses are identified as "preferred" within PTMP planning guidelines; and (3) natural resource restoration efforts that are consistent with both the PTMP and the VMP. Other projects are likely to include stabilization and rehabilitation of historic buildings, utilities and infrastructure improvements, transportation demand management program activities, remediation efforts, and short-term (interim) leasing.

In response to public comment on the Draft Plan and Draft EIS, additional specificity regarding future planning activities was incorporated into the Final Plan. As described in Chapter 4 of the Final Plan, major projects or follow-on

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plans must be approved separately by the Trust Board, and will themselves be subject to additional NEPA review, including public involvement, before their implementation. For project proposals involving potential demolition, new construction, or significant change to the historic landscape of the Presidio, the Trust would undertake more detailed studies and environmental analysis before project implementation. Future implementation activities would build on the PTMP, would address individual sites (e.g., potential infill housing at West Letterman), planning districts (e.g., Fort Scott), or Presidio-wide issues (e.g., parking or open space recreation management), and would provide a greater level of specificity than is included in PTMP. All of these processes would involve coordination with the NPS and other agencies as necessary, and would offer additional public participation opportunities. Public participation would be solicited early on, before projects are cast in stone. NEPA and NHPA compliance would continue to offer an important vehicle for ensuring public and agency participation in projects and plans with the potential to affect park resources.

In accordance with 40 CFR Section 1502.20, future environmental documents may summarize some of the issues discussed in this EIS or incorporate by reference certain of its discussions, while updating or providing additional levels of detail on potentially impacted resources.

### ***1.1.1 THE PRESIDIO SITE***

The 1,490-acre Presidio of San Francisco is within the GGNRA, an extensive national park that begins where the Pacific Ocean meets San Francisco Bay. Established by Congress in 1972, the GGNRA consists of a collection of parklands stretching along over 70,000 acres of San Francisco and Marin County shoreline as illustrated in Figure 1.

The Presidio is one of the country's great historic and natural sites. A military garrison for over 220 years under three different flags, the Presidio has served Spain, Mexico, and the United States of America. It has protected commerce, trade, and migration, and has played a role in every major U.S. military engagement since the Mexican-American War in 1846. Designated a National Historic Landmark (NHL) in 1962, the Presidio contains one of our country's finest collections of places, buildings, structures and artifacts related to military history, and its architecture represents every major period of U.S. military history since the 1850s.

The Presidio's distinctive resources include its historic architecture and landscapes, unique ecological systems and rare plant communities, inviting parklands, spectacular views and recreational resources. The Presidio attracts visitors who take advantage of interpretive programs and exhibits and visit the historic military sites, as well as those who enjoy the natural resources, open space and scenery. Its natural and historic setting is integrated into 500 developed acres with approximately 770 buildings providing approximately 6.1 million square feet of building space, Presidio-wide (Areas A and B). The Presidio contains offices, warehouses, and residential areas including more than 1,600 residential accommodations, utility infrastructure, retail stores, tennis courts, a bowling center, theater, swimming pool, golf course, gymnasiums and other facilities – all within a park that itself is located within the urban setting of the San Francisco Bay Area (see Figure 2).

### ***1.1.2 FROM MILITARY POST TO NATIONAL PARK***

The Presidio's transition from military post to national park began in 1972 when, in the legislation creating the GGNRA, Congress included a provision that the Presidio would become part of the GGNRA if the military ever declared the base excess to its needs. Congress designated the Presidio for closure in 1989, and in 1994 its long-time occupant, the U.S. Army, transferred jurisdiction over the Presidio to the NPS. As part of the transition, the NPS in July 1994 completed and issued a final General Management Plan Amendment GMPA laying out a vision for the Presidio's future use and management.

The GMPA set general land use policies for 13 distinct Presidio Planning Districts to guide visitor use, cultural and natural resource management, development, and operation of the Presidio. The plan called for 348 historic buildings to be rehabilitated for new uses, and 276 buildings totaling 1.5 million square feet to be removed. The GMPA envisioned both public and private organizations establishing a mix of uses at the Presidio, with an emphasis on organizations with missions related to environmental, social, and cultural issues.

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Figure 1: Regional Context

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- |                                     |                      |  |                        |
|-------------------------------------|----------------------|--|------------------------|
| <b>1. Main Post</b>                 | <b>3. Letterman</b>  | <b>5. Public Health<br/>Service Hospital</b> | <b>6. East Housing</b> |
| <b>2. Crissy Field<br/>(Area B)</b> | <b>4. Fort Scott</b> | <b>7. South Hills</b>                        |                        |

Figure 2: Existing Setting

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Once the GMPA was in place, difficult questions about how to carry out the plan remained. NPS recognized that implementing the GMPA would require innovative approaches and unique authorities to manage activities outside of NPS's expertise, such as building leasing, property management, and real estate finance. As the United States Congress debated the creation of a new managing entity, estimates of costs to implement the GMPA showed the Presidio to be by far the most expensive park managed by NPS. NPS estimated annual costs at \$40 million, and capital improvement cost estimates ranged from \$490 million to \$741 million. In view of these projections, Congress was unwilling to commit the federal monies needed over the long term to improve, protect, and maintain the Presidio, but instead created an innovative entity charged with achieving these goals.

### ***1.1.3 THE PRESIDIO TRUST AND ITS UNIQUE MANDATE***

In 1996, Congress established the Trust pursuant to the Trust Act (16 U.S.C. 460bb Appendix). In response to competing public policy goals, Congress gave the Trust the unique responsibility of reducing and eventually eliminating the costs of the Presidio to the federal government while retaining the Presidio within the GGNRA. To achieve these goals, Congress provided for limited federal funds, which would incrementally decrease to zero over 15 years, and provided no appropriated funds targeted for needed capital expenditures. The Trust is a wholly-owned federal government corporation whose purpose is to preserve and enhance the Presidio as a national park while ensuring that the Presidio becomes financially self-sufficient by 2013. Although it did not provide full funding, Congress granted the Trust unique authorities to accomplish the Trust Act's goals. The Trust may generate and retain revenue and borrow money up to a limited amount to finance repair and rehabilitation of the Presidio's historic structures. The Trust assumed administrative jurisdiction over about 80 percent of the Presidio (Area B) on July 1, 1998; NPS retains jurisdiction over the coastal areas (Area A) (see Figure 2).

The Trust is managed by a seven-person Board of Directors. Six members are appointed by the President of the United States, and the seventh member is the Secretary of the Interior or the Secretary's delegate. The Trust is managed by an Executive Director and a professional staff with diverse experience and expertise in real estate leasing, finance, development, property management,

park stewardship, and natural resource protection and management. Pursuant to the Trust Act, NPS, in cooperation with the Trust, provides visitor services and interpretive and educational programs throughout the Presidio. The NPS Park Police also provides public safety services under a contractual arrangement with the Trust.

### ***1.1.4 THE PRESIDIO TODAY***

The Presidio today provides evidence of how the site has been occupied, developed, and shaped over time. The Presidio contains approximately 770 buildings, of which 730 are managed by the Trust; over half of these are historic. A large amount of built space is used as office and warehouse storage. The Presidio also contains over 1,600 residential accommodations in almost 400 buildings. These accommodations range from large single-family homes to apartment complexes and barracks. Community and visitor facilities include chapels, a child care center, post office, the NPS Visitor Center, meeting facilities, and tennis courts, gymnasiums, a bowling center, a theater, a swimming pool, a golf course, and a number of small playgrounds and athletic fields. These facilities support a community of residents and employees of the various organizations located in the Presidio. The Trust operates or oversees the Presidio's electric, water, wastewater collection, storm drain, and refuse collection services. Ongoing infrastructure repairs and improvements are intended to make the Presidio a state-of-the-art demonstration site for innovative technologies, such as a micro-cogeneration for generating electricity, a recycled water system to meet landscape irrigation needs, and advanced telecommunications and innovative data transfer technologies to support uses at the park.

Dramatic geological formations, a favorable climate, rich water resources and protected open space have contributed to the site's rich biological diversity. As the surrounding areas have become more urban, the Presidio has provided critical refuge for plants and wildlife. Rare plant communities that have disappeared in the rest of the San Francisco peninsula survive within the 1,490-acre Presidio reservation. These remnant native plant communities preserve rare and endangered plant species and provide valuable wildlife habitat. They include serpentine grasslands where wildflower and grass species flourish; the last remnants of dune communities that once covered what is now the city of San Francisco; and riparian and wetland communities including Lobos Creek, the best example of a native riparian community in

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the city. The Presidio contains a number of rare plants including Raven's manzanita, which has been saved from extinction through the GGNRA's plant propagation program. Other important natural resources include the still visible drainages at Mountain Lake, Lobos Creek, Tennessee Hollow, and the newly restored tidal wetland at Crissy Field.

The Presidio also provides an exceptional recreational resource within a major metropolitan area. It offers opportunities for a wide range of active pursuits as well as places for solitude and retreat. Sites throughout the Presidio provide spectacular vistas of the Pacific Ocean, the Golden Gate, the Marin Headlands, San Francisco Bay, and the skyline of San Francisco. Visitors enjoy walking, jogging, biking, sightseeing, surfing and wind surfing, sailing, fishing, and learning about the Presidio's history and environment. Others participate in an active stewardship program focused on preserving and restoring the park's natural systems.

## 1.2 PURPOSE AND NEED FOR THE PLAN UPDATE

The purpose of the proposed *Presidio Trust Management Plan – Land Use Policies for Area B* of the Presidio of San Francisco (PTMP) is to provide a land use policy framework to guide the Trust's implementation of the Trust Act by updating the management concepts and land use proposals of the 1994 GMPA for the area of the Presidio under the Trust's jurisdiction. The PTMP is needed to provide a planning framework that is well-suited to and consistent with the requirements of the Trust Act, to address changed conditions that have occurred since the GMPA was completed, and to allow the Trust to be responsive to new opportunities as they arise, taking into account the Trust's mandate to be financially self-sufficient while retaining as much as practicable from the GMPA.

*Trust Act Requirements* – In 1996, two years after the NPS finalized and adopted the GMPA for the Presidio, Congress set new requirements for Area B. The GMPA assumed the Trust would be established under the Department of the Interior with the NPS retaining primary responsibility for the Presidio's management. Instead, Congress created the Trust as a wholly-owned federal government corporation, transferred the Secretary of the Interior's administrative jurisdiction to the Trust for all of Area B, and required conformity only with the purposes of the GGNRA Act and with the General Objectives of the GMPA.

PTMP is needed to create an updated policy framework that takes into account the concepts and principles of the GGNRA Act and GMPA, balances them with the newly enacted superseding statutory requirements of the Trust Act, and brings them into conformity with the new and additional mandates of the Trust Act. The Trust must manage its portion of the Presidio in such a way as to become financially self-sufficient with respect to both annual operations and long-term needs. Beginning no later than Fiscal Year 2013, the Trust must generate sufficient revenues from Area B to sustain the park resources and operations in perpetuity, including the necessary building and infrastructure-related capital improvements and funding replacement reserves.

In addition, the Trust Act also requires consideration of a number of other factors that the GMPA did not. Removal and/or replacement of some structures must be considered as a management option in administering Area B. In managing and leasing properties, the Trust must give priority to those tenants that enhance the financial viability of the Presidio and facilitate the cost-effective reuse of historic buildings. Other requirements include obtaining reasonable competition in leasing, considering the extent to which prospective tenants contribute to the reduction in cost to the federal government, and bringing all Area B properties into compliance with federal building codes and regulations. All of these requirements and others are to be accomplished while managing the Presidio so as to protect it from "development and uses which would destroy the scenic beauty and historic natural character of the area and cultural and recreational resources." The plan update is needed therefore not only to carry out the new financial requirements but also to balance management and leasing activities with the resource protection mandate of the Trust Act.

*Changed Conditions* – The proposed plan update is also needed to reflect changes that have occurred since 1994, including progress that has been made towards implementation of the GMPA. Almost as soon as the GMPA became final, the financial assumptions underlying the GMPA changed significantly. As examples, in enacting the Trust Act, Congress rejected the GMPA idea of a continuing annual federal appropriation for the Presidio of between \$16 to \$25 million. The GMPA had assumed that this federal appropriation would continue. The updated plan is needed to ensure lost federal appropriations can be generated from leasing or other sources. Also, the GMPA assumed substantial philanthropic contributions. While NPS has received some

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philanthropic funding for activities in Area A under NPS jurisdiction, only limited donations have been received for activity in Area B. The Trust will continue to pursue such funding, however, donations cannot be guaranteed, and the updated plan is needed to ensure other sources for these assumed funds should they fail to materialize. Similarly, a number of leases were adopted, including several early NPS leases with non-profit organizations on terms that provide for minimal long-term revenues. Most of the early lease transactions provided that tenants would rehabilitate and occupy buildings, although they could contribute only minimal rent to support ongoing operations. The plan update is needed to reflect this new information on lease revenues and to ensure the Trust Act's tenant selection and financial requirements are met.

The GMPA assumed that the Sixth U.S. Army would continue to use approximately 30 percent of the Presidio's square footage of building space, including about half the available housing. The Sixth Army's presence was anticipated to be a significant benefit to the Presidio; the Sixth Army was to pay for direct expenses for buildings, facilities and other occupied property, and share the operating expenses common to Presidio tenants. Shortly after NPS completed the GMPA, however, the Department of Defense decided to move the Sixth U. S. Army and to vacate the Presidio permanently. The Army's departure had a dramatic effect on the GMPA's financial and building occupancy projections. The GMPA assumed that the Sixth U.S. Army would occupy 277 buildings, comprising 1.8 million square feet of residential and non-residential building space (totaling 30 percent of the Presidio square footage), for an indefinite period, but the Army had largely departed the Presidio by 1994. The plan update is needed to ensure housing and residential leasing policies are current and reflect the Army's departure.

Other land use concepts presumed in the GMPA have also not been supported by existing conditions or market demand. For example, the proposed use for the Letterman Complex as a health science, research, and education center could not be realized when the intended user, the University of California at San Francisco (UCSF), failed to conclude a lease agreement with NPS prior to enactment of the Trust Act. An alternate user wishing to establish a digital arts and design center at the site was considered and selected by the Trust. Similarly, the conference center and residential education use contemplated under the GMPA for the Public Health Service Hospital site was not

supported by market demand or actual market offerings when such users were solicited by the Trust in 1999. The plan update is needed to ensure that market factors are taken into account when considering uses and to ensure a diversity of tenant types.

Prior to creation and full operation of the Trust, other decisions were made altering the land use designations in the GMPA. As examples, the NPS altered the GMPA land use plan by deciding to abandon Building 35 as a comprehensive public safety facility, and instead to split police and fire services by rehabilitating and constructing an addition to the Presidio fire station. The GMPA was also altered by the NPS in implementing later phases of the Thoreau Center for Sustainability which led to the reuse of the buildings along O'Reilly Avenue for offices rather than lodging as prescribed by the GMPA. The plan update is needed to ensure sufficient plan versatility to allow consideration of alternative or changed uses, when appropriate.

Since the Army's departure and the establishment of the Presidio Trust, the Trust has renovated and put back into use the remaining Wherry Housing (Baker Beach Apartments) on a short-term basis. The Trust's re-activation of this housing yielded important rental revenues in the Trust's start-up years and afforded a broader mix of housing options for Presidio employees. The plan update is needed to reconsider housing approaches and policies for the Presidio.

The PTMP planning effort is needed to assess changed conditions, reconsider and update the GMPA's market clusters concepts, and provide revised land use concepts for the Presidio that can accommodate changing opportunities and market conditions. A more flexible plan than the GMPA was needed by the Trust so that a plan amendment would not be required each time a change in a land use designation or building treatment specified by the GMPA occurred due to unforeseen conditions, the market, or a new opportunity.

*New Policies and Management Approaches* – Because of the Trust Act's financial self-sufficiency requirement, the Trust cannot be assured of continuing federal financial support for the Presidio's long-term operation and protection. There is, therefore, a greater need to consider and take into account market principles, financial uncertainties, and changing economic conditions. Markets and financial conditions are inherently unpredictable, offering certainty only in the existence of periodic cycles, with some periods

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of economic strength followed by inevitable downturn. Implementation of the GMPA was based upon the slumped real estate market conditions existing in 1994 as projected through the 1990's. At the time, no one foresaw the surge in the San Francisco real estate market nor the current economic downturn following almost 6 years of unprecedented economic growth. Growth throughout the late 1990s has put stress upon the regional housing market, and created new business demands that could not have been foreseen in 1994 when the GMPA was being developed. The plan update is needed to more adequately address these and similar market changes that could occur over time.

The Trust needed to revise the governing plan for Area B in order to plan and manage for financial uncertainty. Even after new financial projections are developed, the Trust can neither be sure of the timing of cash flow, the availability of tenants, or of expected financial outcomes.<sup>1</sup> In the GMPA, as elsewhere, NPS chose to establish a highly specific and prescriptive plan. The NPS then sought monies through the federal appropriations process to fund implementation of the plan in all of its specific prescriptions. The Trust, on the other hand, has been given a mandate that must be met largely without federal funding. The Trust's plan must, therefore, apply market principles and balance market opportunities and conditions with the programmatic and resource goals of the plan. Thus, there is an inherent need for a plan which allows the Trust to remain flexible in managing its resources for the long-term.

At times, the Trust may not be able to conclude a financially viable transaction on an otherwise desirable project because of, for example, obsolete building configurations, tenant needs, or other factors. In some of these

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<sup>1</sup> The financial model used during the PTMP planning process was developed for a limited purpose and its projections therefore are of limited utility. It is axiomatic that the longer the projection period (in this case 30 years), the less reliable the result. For this reason, the PTMP financial model was designed using many common assumptions so as to allow a fair and accurate comparison among planning alternatives rather than as a precise predictor of future financial results, and should not be relied upon as a future budget goal or constraint. Financial conditions will continue to be forecast and updated during the Trust's budgeting process and financial progress will be continually monitoring and assessed.

circumstances, the Trust may wish to consider other options such as alternate uses, a change in location, or possible building demolition with new replacement construction. At other times, apparently favorable projects may have to be deferred, changed or foregone because of financial factors such as cash flow concerns or market conditions. Market demand could fail to deliver an intended use, or changed market conditions could require a different approach to leasing or financing that better addresses the existing market opportunities or realities at the time. The Trust needs the flexibility of a programmatic, rather than prescriptive plan to respond to market factors like these. The PTMP is intended to provide this flexibility, while ensuring that an overarching policy framework is established for Area B to guide future activities in a manner consistent with the Presidio's national park status.

The Trust was created in part to bring to bear a depth of professional experience and special skills in property management, financing, leasing, and building restoration. The plan update is needed to guide the appropriate application of this expertise in the overall pursuit of the GGNRA Act purposes and the GMPA's General Objectives.

### 1.3 OBJECTIVES OF THE PLAN UPDATE

In order to satisfy the purpose and need for this planning process, the Trust has identified the following objectives for the planning update process. The planning update process is intended to result in a plan that meets these objectives to the fullest extent possible.

#### 1.3.1 *CONSISTENCY WITH TRUST ACT RESOURCE MANDATES*

Among the legislated goals of the Trust are the preservation and enhancement of the Presidio's "outstanding natural, historic, scenic, and recreational" resources for public use. The Trust must achieve its legislated resource goals by managing Presidio resources to become financially self-sustaining. Many of the Trust Act requirements differ from those that NPS must meet in other areas of the GGNRA under its administrative jurisdiction, and were not anticipated or addressed by the GMPA when it was developed by the NPS in 1994. The Trust Act requirements are a necessary element of the Trust's operations, and therefore must be addressed by the plan update.

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The Trust Act sets forth two overall requirements of the Trust. First, the Trust must manage the leasing, maintenance, rehabilitation, repair and improvement of property within Area B of the Presidio in accordance with the purposes set forth in the GGNRA Act (Public Law 92-589, 86 Stat. 1299; 16 U.S.C. § 460bb). Second, the Trust must manage the leasing, maintenance, rehabilitation, repair and improvement of property within Area B in accordance with the purposes of the GGNRA Act and the “general objectives” of the GMPA.

The purposes of the GGNRA Act are clear and are stated in its preamble as follows:

*In order to preserve for public use and enjoyment certain areas of Marin and San Francisco Counties, California, possessing outstanding natural, historic, scenic, and recreational values, and in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning, the Golden Gate National Recreation Area is hereby established. In the management of the recreation area, the Secretary of the Interior shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management. In carrying out the provisions of this Act, the Secretary shall preserve the recreation area, as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area.*

The general objectives of the GMPA, which are not precisely identified either within the text of the GMPA itself or by Congress in the Trust Act, have been determined by the Trust and set forth in Trust Board Resolution No. 99-11, dated March 4, 1999 (General Objectives). The following are identified as the General Objectives:

1. To preserve and (where appropriate) enhance the historical, cultural, natural, recreational, and scenic resources of the Presidio;
2. To address the needs of Presidio visitors, tenants and residents for community services such as transportation, water, power, waste

management, and public safety (among others) in an environmentally responsible manner, while respecting neighboring communities;

3. To increase open space, consolidate developed space and provide for appropriate uses of the Presidio, including uses that involve stewardship and sustainability, cross-cultural and international cooperation, community service and restoration, health and scientific discovery, recreation, the arts, education, research, innovation and/or communication; and
4. To sustain the Presidio indefinitely as a great national park in an urban setting.

Although the Trust is not required to follow the specifics of the GMPA, the requirement to adhere to its General Objectives underscores the importance of the GMPA as a foundation of the Area B plan update.

### **1.3.2 CONSISTENCY WITH TRUST ACT FINANCIAL MANDATES**

In enacting the Trust Act, Congress stated in Section 101 (7) of the Act that the “Presidio will be managed through an innovative public/private partnership that minimizes cost to the United States Treasury and makes efficient use of private sector resources.” This charge requires the Trust to manage Area B of the Presidio in such a way as to become financially self-sufficient in both the short-and long-term. In other words, the proposed plan must provide a framework under which the Trust can generate sufficient revenues to support Area B operations over the short-term without annual Congressional appropriations, which will end in FY 2013. To be fully responsive to the financial self-sufficiency goal requires more than revenues exceeding expenses at any point in time. Long-term financial sustainability, an aspect of self-sufficiency, requires generating sufficient revenues over and above operating expenses to fund all capital needs and future replacements or upgrades of the Presidio’s infrastructure and natural and built environment. Routinely, some monies must be invested into the capital replacement fund to plan for the Presidio’s future care into perpetuity. A successful plan must achieve financial self-sufficiency in both the short-and long-term.

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### ***1.3.3 FLEXIBILITY TO RESPOND TO MARKET CHANGES AND OPPORTUNITIES***

Because markets and financial conditions are inherently unpredictable, the Trust must have a plan to manage financial uncertainty. The Trust cannot be sure of the timing of cash flow, the availability of tenants, or of expected financial outcomes. The Trust seeks to affirm a plan that ensures the Trust can meet the legislated mandate for financial self-sustainability. The plan must provide sufficient flexibility in its land use and programmatic concepts to allow the Trust to be responsive to changing conditions, market conditions and demand, and new opportunities as they arise. With flexibility will come a commitment to seek continuing public input on proposals for change and to undertake site-specific and district-level planning efforts and environmental analysis as needed in the future. Please refer to Chapter 4 of the Final Plan for additional information on future review.

### ***1.3.4 CONSISTENCY WITH PLANNING PRINCIPLES AND GUIDELINES***

The plan must set forth planning principles that translate the overall vision of the plan into specific goals for managing Area B. As a result, the Planning Principles and District Guidelines set forth in the Final Plan have been developed, and subsequently refined through public comment, with the intent that they would apply to each and any plan alternative under consideration. The Planning Principles are intended to articulate the essential management objectives that will be applied as the plan is implemented. The District Guidelines correspond to the varied characteristics of each district and provide guidance on the treatment of open space, district character, views, access and circulation and other physical characteristics. The District Guidelines were established to conform to the Secretary of the Interior's standards. The plan must establish consistency with its Planning Principles and District Guidelines as a prerequisite for future decisions and activities.

### ***1.3.5 CLEAR RELATIONSHIP WITH EXISTING PLANS AND CONSIDERATION OF PUBLIC INPUT***

The plan for Area B is an update of the GMPA, and is not starting from a blank planning program; it is intended to encompass many of the concepts and area plans of the GMPA while modifying others as warranted. The Trust

seeks to approve a plan that retains and builds upon many of the park-wide principles and land use elements of the GMPA. The Trust also seeks to approve a plan that has been reviewed by the public and provides a continuing role for the public in the Presidio's future.

### ***1.3.6 HOUSING***

Growth throughout the last decade has put stress on the regional housing market. Given the regional housing context, the Trust seeks to approve a plan that addresses the demand for housing and reduces spillover impacts on the City of San Francisco's housing supply. Providing housing preferences for Presidio employees is a further plan objective, and transportation demand management strategy.

### ***1.3.7 DESIRED TENANTS***

As required by Trust Act section 104(n), the plan must give priority to tenants that enhance the financial viability of the Presidio, and must consider the extent to which prospective tenants contribute to the reduction in cost to the federal government. Further, the terms and conditions of leases must meet other economic requirements of the Trust Act, including the recovery of the Trust's costs to pay for health, safety, and infrastructure services.

The GMPA identifies potential partners or tenants for the Presidio as those involved in education, arts, scientific research, environmental studies, scientific inquiry, healthcare, philanthropy, conflict resolution, and international relations. To address the additional Trust Act tenant selection requirements and changed economic opportunities since 1994, a fully successful Area B plan will allow the Trust to consider and offer tenancies to a wide range of potential tenants.

### ***1.3.8 PROGRAMS AND PUBLIC USE***

Public use and enjoyment of the Presidio are essential to its success and future as a national park. Public programs and uses encompass a broad range of community and public events and activities, including educational and learning centers, youth activities, special events, hands-on demonstrations, museums and exhibits, festivals, celebrations, and enhanced interpretation programs. The Trust seeks to adopt a plan that results in a wide array of public programs and uses, not only NPS interpretive programs and programs

provided and funded by mission-based tenants, but also programs delivered and paid for by general Trust revenues and programs delivered and paid for through collaborations with organizations and partners outside the Presidio.

### ***1.3.9 HISTORIC COMPLIANCE***

The Trust's goal is to develop and adopt a plan that acknowledges the importance of the historic resources within Area B of the Presidio, ensuring the protection of the NHLD status of the Presidio. The Trust seeks a plan that will aid in compliance with the NHPA, and adhere to the provisions of the Trust Act.

### ***1.3.10 ENVIRONMENTAL SUSTAINABILITY***

Both the General Objectives of the GMPA and the GMPA itself establish sustainability as a key goal. The Trust seeks a plan that considers and can accommodate the balance between economic, social, and environmental issues in its framework. To achieve environmental sustainability, the plan must meet the current needs of the park without compromising the quality of the park experience for future generations. The principle of environmental sustainability is a foundation upon which planning for the Presidio is built.

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