

4.12 OPEN SPACE (OS)

CONTENTS

- OS-1. *Open Space Vision*
- OS-2. *Landscaped vs. Natural Open Space*
- OS-3. *Contiguous Open Space vs. Housing vs. Historic Resources*
- OS-4. *Open Space Priorities*
- OS-5. *Transfer of Open Space Areas to NPS*

OS-1. *Open Space Vision*

The GGNRA Citizens' Advisory Commission and various natural resource conservation organizations and individuals request that the Plan include a broader natural open space vision that unifies the park's fragmented natural areas into contiguous natural corridors with high biological value. They note that such a vision would increase biologically important open space; minimize habitat fragmentation; restrict traffic impacts, lighting and domestic pets to areas already developed; improve the setting for passive recreation; and improve travel times of the internal shuttle. Some believe a cohesive vision would return the Presidio to its historic, pre-1945 land-use pattern of compact communities. The California Native Plant Society points out that if portions of the ridgeline now containing existing serpentine grassland habitat, which are currently isolated from each other by buildings, planted trees, and landscape vegetation, were restored to a mosaic of native grassland patches and native scrub and forest, this would substantially increase the potential for long-term survival and persistence of native plant species, increase habitat quality for a diversity of wildlife, and create an enhanced park visitor experience and education. Other commentors note that unless the habitat loss and fragmentation can be reversed, it is likely that many more species will become extinct on the Presidio over the next several decades.

Not all commentors support this open space vision. One individual implies that open space should not be increased because it is not a revenue-generating

use. Others see an increase in open space as a threat to the integrity of the cultural landscape. Other commentors believe that there is adequate open space in San Francisco and that the cultural and housing potential of the Presidio, with its rich and interesting building stock, should not be overlooked in an "ill-considered quest for more open space."

Response OS-1 – The Final Plan will increase the Presidio's open space by 99 acres, emphasizing the protection of both the natural and cultural resources at the Presidio, and prompting the long-term ecological health of the remnant native vegetation communities. The PTMP adopts the management objectives stated in the VMP, by creating viable ecological corridors throughout the southwestern dune system, the coastal bluff tops and the Tennessee Hollow watershed. Establishment of these larger contiguous corridors (with fewer edges) allows more sustainable management, promotes increased species richness, reduces urban pressures, and better protects wildlife movement by linking existing remnant natural areas, creating open space buffers and establishing connections to important habitats. Creation of these native corridors will be realized through the support of community stewardship, and will result in increased opportunities for diverse passive recreational experiences. Open space restoration priorities are based on the objectives for natural habitat protection in the PTMP, and focus on the linkage and restoration of existing remnant systems. Large-scale efforts that could benefit open space improvements are being coordinated so as to be consistent with the Trust's environmental remediation program, USFWS recovery plans, and implementation of the VMP.

As discussed in the PTMP, scientific data collection and monitoring will help guide future long-term planning restoration priorities for the Presidio's rare serpentine communities and associated special-status species recovery. The Trust will conduct additional soils surveys and habitat analysis where necessary to determine the restoration potential of targeted serpentine vegetation communities within East Washington housing and the non-turf areas of the golf course. The Trust is currently expanding serpentine grassland restoration efforts within the Inspiration Point region, and east of the World War II Memorial. Included in these efforts is the reintroduction of extirpated species where appropriate – re-establishing some of the important species that have been lost throughout the past 200 years. Additionally, the

RESPONSE TO COMMENTS

4. Responses to Comments

proposed Golf Course Habitat and Wildlife Management Plan will identify management actions to promote linkages between ecological systems and maximize natural resource values. The Trust also recognizes the importance of protecting and enhancing small, isolated native vestiges scattered throughout the Presidio that could serve as significant habitat for key pollinators, promote supporting important linkages for gene flow, and connect important ecological islands within larger corridors. The PTMP will promote further protection of these remnant patches by managing them, to the greatest extent feasible, consistent with the VMP native plant community zone objectives. The increase in the Presidio's open space will not occur without regard to financial considerations or the Presidio's housing potential. The Final Plan projects that the increase in open space that will result from the removal of non-historic housing, including Wherry Housing and some of the West and East Washington Boulevard housing in its South Hills district, will occur over a thirty-year period. This projected time frame will allow the Trust to take advantage of the revenue-generating capacity of these buildings. The Plan further projects that housing units lost through demolition of these buildings will be recouped through subdividing other Presidio dwelling units, converting non-residential buildings to residential use, and building some replacement construction in already developed areas of the Presidio. Refer to Final Plan, Chapter Two, Housing, and also see Response OS-3.

OS-2. *Landscaped vs. Natural Open Space*

An individual requests that the PTIP show on a map the proposed open space gains by VMP zoning category (i.e., native plant communities, historic forest, and landscaped areas) to provide a clearer picture. Another individual suggests that the PTIP distinguish between natural open space and landscape open space and finds the definition of open space and the summary table in the document confusing and in need of refinement.

Response OS-2 – The Final EIS includes land use maps for each alternative that distinguish between the various types of open space, consistent with the VMP zoning designations. Management of these open space types (native plant communities, historic forest, and cultural landscapes) would be consistent with management objectives stated in the VMP. For example, open space designated as native plant communities would be managed to promote

and restore ecological values. Table 1 in the Final EIS provides a detailed breakdown of the changes in open space, and can be referenced when reviewing the Final Plan's open space summary table.

OS-3. *Contiguous Open Space vs. Housing vs. Historic Resources*

The San Francisco Planning and Urban Research Association (SPUR) favors maximizing contiguous open space but only to the extent that other uses are not transferred to already disturbed land that should be used for replacement housing. SPUR maintains that more contiguous open space can and should be created in part by concentrating housing around transit and other amenities, and suggests more planning in the infill areas to determine the trade-offs between the loss of housing and the addition of open space. Other commentors question creating more open space in the southern part of the park and replacing it by increasing the density in the northern parts of the park, and ask whether this would increase housing rents for the same amount of space.

Response OS-3 – Similar to the Draft Plan, the Final Plan calls for the removal of Wherry Housing, and some of the West and East Washington Boulevard housing in the South Hills district in order to restore contiguous open space and native plant habitat. In addition, the Final Plan states that at the remaining East and West Washington sites, the Trust will improve the landscape to complement the surrounding natural environs. This housing would be removed in phases. The Final Plan commits that the number of housing units and other residential accommodations will not exceed the current number (approximately 1,650). To accomplish this, the units removed in the South Hills district will have to be replaced; there are several options for doing this. However, the Plan also assumes that, though the number of dwelling units will not exceed the current amount, the total building square footage dedicated to residential uses will be reduced from what it is today (in effect suggesting that the same number of units will be within a smaller amount of built space).

The Trust concurs with SPUR's recommendation that more housing be located closer to transit service and other amenities. The Final Plan envisions that residential uses are the primary uses that will be transferred from open space restoration areas to already disturbed areas. In addition to the removal

RESPONSE TO COMMENTS

4. Responses to Comments

of non-historic residential buildings, the Plan provides for changes in the composition of housing at the Presidio over time through subdividing existing non-historic dwelling units, as well as converting non-residential buildings to residential use in areas closer to transit and activity centers. Some new construction could replace existing non-historic buildings, improve the aesthetic and historic qualities of the park, and make more housing closer to public transit and other park amenities. Any new residential construction will involve additional planning, public input, and environmental analysis. See Chapter Two, Housing, of the Final Plan.

With regard to the concern about potential effects of new housing on rental rates. The Plan does not, and cannot, prescribe the precise number of units, precise rents or affordability criteria, or the precise mix of occupants. These results will be determined as buildings are rehabilitated, as housing demand and employment are monitored, and as evolving market conditions intersect with overall Plan objectives.

OS-4. Open Space Priorities

Presidio Native Plant Nursery and restoration volunteers urge the Trust to give native habitats priority over ornamental landscaping that is labor intensive, more susceptible to disease and insect infestation, and generally higher maintenance.

Response OS-4 – The Trust recognizes and supports the imperative of restoring the Presidio's remnant native habitats, specifically those areas harboring rare species. The Trust also has a mandate to protect and rehabilitate the Presidio's cultural landscapes and historic forest which contribute to the NHLD. The PTMP is guided by the vegetation management framework set forth in the adopted VMP that seeks to balance these objectives. While the VMP does not establish priorities for management activities between vegetation zones, it promotes sustainability practices within designed landscapes with the goal of reducing irrigation, herbicide application, intensive maintenance, and increasing practices such as composting, integrated pest management and mulching.

OS-5. Transfer of Open Space Areas to NPS

A few commentors ask the Trust to address Section 103(b)(1) of the Trust Act. They ask the Trust to consider the transfer of open space areas to the NPS, and to explain why open space is not proposed for transfer back to NPS jurisdiction and administration. One commentor suggests that the Trust is required to transfer open space areas to NPS.

Response OS-5 – Under Section 103(b)(1), the Trust is “encouraged to transfer to the administrative jurisdiction of the Secretary open spaces which have high public use potential and are contiguous to other lands administered by the Secretary.” This provision is not mandatory but discretionary; it *encourages* but does not direct the Trust to act.

The Trust has not foreclosed the possibility of transferring open space areas of the Presidio within Area B to NPS, but is not currently proposing any such transfer. The Plan’s silence on this issue does not, however, prevent the Trust and the NPS from considering and assessing the appropriate implementation of this provision in the future.

The Trust and the NPS regularly collaborate on the management of open space areas within Area B. A natural resources Memorandum of Agreement between the NPS and the Trust guides the implementation of key natural resource projects within Area B’s open spaces. The two agencies are jointly managing other open space projects that cut across the jurisdictional boundaries of the two agencies, such as the Trails and Bikeways Plan. Other cooperative efforts include the Mountain Lake Enhancement Plan and the Crissy Marsh Study. This type of ongoing collaboration and joint implementation of projects related to the Presidio’s open space limited any need for the Trust to propose transfer of open space acreage to the NPS in the Plan. For further response to this comment, refer to Response FI-24.