

4.14 LAND USE (LU)

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LU-1. *Consistency with the GMPA*

A Presidio advocacy group requests that the EIS include an analysis of the consistency of the Final Plan Alternative with the GMPA. The same group also asks for an analysis of all text sections in the GMPA that are proposed to be changed.

Response LU-1 – In general, the PTMP planning principles that would guide the Trust’s efforts to protect and manage the park are consistent with the GMPA’s specific objectives, including those under stewardship and sustainability, community service and participation, visitor use and enjoyment, resource management, transportation, sustainable design and conservation practices, orientation and accessibility improvements, interpretation and education, and sustainable design and conservation practices. The PTMP’s primary emphasis on protecting and enhancing park resources narrows the GMPA’s vision of the park as a global center, as discussed elsewhere in response to comments. To the extent that the Trust’s tenant selection criteria would allow a broader group of tenants, including not just those who could “build on the historical role of the Golden Gate as a crossroads of international exploration, cooperation and exchange,” the alternatives (with the exception of the No Action Alternative (GMPA 2000) and Final Plan Variant) would broaden the GMPA’s cross-cultural and international cooperation emphasis (page 26 of the GMPA). The PTMP’s goal of collaborative interpretation, whereby the Trust’s programmatic

contributions would supplement those of the NPS and park tenants, would also broaden the GMPA’s interpretation and education objective (page 29 of the GMPA), which only provides for NPS/tenant interpretive and education programs. Finally, the PTMP’s provision that would allow some new construction of housing on infill sites would update the GMPA’s residential use provisions, which do not support replacement housing (page 50 of the GMPA).

Other policy differences between the GMPA and the PTMP are described through these responses to comments, including responses related to the planning guidelines, which describe similarities and differences within each planning district. Also, in response to comments on the Draft EIS, the Land Use discussion within the Environmental Consequences section of the EIS has been expanded and revised to clarify changes in expected land uses between each alternative and the No Action Alternative (GMPA 2000).

With regard to the commenter’s suggestion that all text sections of the GMPA that are proposed for change be described in the EIS, the Trust considered this suggestion but did not adopt it for reasons of practicality, essentially because the tiered evolution of the documents does not lend itself to that sort of line-by-line treatment. The PTMP is an update of the GMPA in its entirety (as it applies to Area B), and evolved from the GMPA, which provided much of the basis for the policy statements and land use provisions of the PTMP.

LU-2. *Consistency with the San Francisco Bay Plan*

The Bay Conservation and Development Commission (BCDC) requests that the EIS discuss the Coastal Zone Management Act, relevant policies in the San Francisco Bay Plan, and the consistency determination process.

Response LU-2 – In response to the comment, the text of the Final EIS has been amended to include a discussion of the San Francisco Bay Plan as an approved plan with policies affecting the Presidio. Refer to Section 3.4 of the Final EIS. Since the publication of the Draft EIS, the Trust met with BCDC staff on several occasions to review their concerns regarding Trust programs and activities that could affect the coastal zone management program, and prepared a consistency determination on the Trust’s proposed activities related to the PTMP. See Section 5.2 of the Final EIS. The consistency determination

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concludes that the PTMP (1) is consistent with the Bay Plan (which designates the Presidio as a park priority use area and states that the shoreline and the undeveloped areas in the Presidio should be retained as a regional park); and (2) if implemented, would be consistent with the BCDC's coastal management program by increasing open space and recreational opportunities, preserving historic resources, rehabilitating native vegetation and riparian areas, preserving and enhancing Bay views, protecting water quality, establishing a network of trails and bikeways through the Presidio, and encouraging public transportation demand management strategies.

LU-3. Consistency with the San Francisco General Plan

The CCSF Planning Department and a Presidio advocacy group request that the Final EIS analyze the consistency of the Final Plan Alternative with policies contained in the San Francisco General Plan.

Response LU-3 – As discussed in Section 3.4.1 of the Draft EIS, the Presidio is a federal enclave within the City and County of San Francisco, and local land use plans, policies and regulations are inapplicable to these federal lands. While the CEQ NEPA Regulations require that an EIS discuss possible conflicts between a federal action and land use plans “for the area concerned” (40 CFR Section 1502.16 (c)), the Presidio’s land use plan for the area concerned is currently the NPS GMPA. Nevertheless, this section of the EIS describes the San Francisco General Plan, including the policy of the Recreation and Open Space Element that calls for preservation of the Presidio and its resources. In response to the comment, the Final Plan is described further in relationship to the San Francisco General Plan.

The San Francisco General Plan designates the Presidio as “P” for Public Use and identifies Area B as “Open Space Area” and “Developed Area” (Map 3). Specifically relative to the Presidio, Policy 5 of the Recreation and Open Space Element calls for the preservation of the open space and natural, historic, scenic, and recreational features of the Presidio, and recommends various guidelines to apply to new development and land use changes. The relationship of the Final Plan Alternative to these guidelines is described below.

New Structures – Guidelines and procedures in the Trust’s Final Plan would ensure that any new construction is located and sized appropriately as called for in the CCSF’s Guideline 1, which states that “no new structures should be built that would adversely affect the scenic beauty and natural character of the Presidio.”

New Construction – Similar to language in the Presidio Trust Act and the Final Plan, the CCSF’s Guideline 3 recognizes removal and/or replacement of some structures within the Presidio as a management option. (“New construction should be limited to replacement of existing structures with an improvement of similar size.”)

Open Space Areas – Conformance with the objectives and zoning set forth in the Presidio’s adopted Vegetation Management Plan would promote “a balanced approach to maintenance of the forest resource and restoration of the native vegetation communities” as called for in the CCSF’s Guideline 7.

Historic Structures – Guidelines in Chapter Three of the Final Plan would ensure that the size, scale, location, and design of new construction would be compatible with the Presidio’s historic setting and the character of the area. These guidelines and preservation, rehabilitation, and use of historic buildings and landscapes in accordance with The Secretary of Interior’s Standards for the Treatment of Historic Properties and the Guidelines for Rehabilitating Buildings at the Presidio of San Francisco would promote the CCSF’s Guideline 6, which suggests that “historic structures and sites should be preserved.”

Hiking and Bicycle Trails – Implementation of a joint NPS/Trust Presidio Trails and Bikeways Master Plan currently under preparation would be responsive to the CCSF’s Guideline 8, which recommends improvements to the recreational trail system. (“The system should include well designed and marked hiking and bicycle trails through the Presidio. Points of historic interest should be marked. A shoreline trail should link Seacliff with the Marina.”)

Housing – Replacement construction of housing at the Presidio (projected at between 200 and 400 units total) would not address the CCSF’s Guideline 2, which states that “no additional housing units should be constructed in the

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Presidio.” However, replacement housing would support numerous other General Plan policies, especially those in the Residence Element that emphasize protection and enhancement of the city’s housing stock.

As noted routinely in environmental documents prepared by the CCSF, consistency with the General Plan requires careful consideration of often competing policies and objectives. Thus, the Final Plan’s apparent inconsistency with one policy should not be viewed as an overall inconsistency with the General Plan. As noted in the CCSF’s comments on the Draft Plan, “there are numerous policies that support preservation of the existing housing supply, and the City supports the concept of no net loss of housing.”

LU-4. Proposition M

A Presidio advocacy group requests that the Trust identify what impact the Plan would have on Proposition M (November 1986), the city growth control measure.

Response LU-4 – The CCSF is responsible for interpreting the local voter initiative known as Proposition M, which sets an annual limit on the amount of new office space approved in San Francisco. Office space on federal property is not required to compete for approval (i.e., in the "beauty contest"), as would an office project under CCSF jurisdiction. However, the Trust understands that as federal office space comes on-line, it can affect the amount of office space that the CCSF, acting under its own laws, can approve in a given year. The Presidio was still the property of the Army when Proposition M was approved, and many of the buildings were in use by the military as office space. The question of whether occupancy of office space at the Presidio constrains the amount of office space the CCSF approves on an annual basis under Proposition M is a matter within the purview and jurisdiction of the CCSF, not the Trust.

LU-5. Environmental Remediation

A member of the Presidio Restoration Advisory Board (RAB) is concerned that the PTMP’s proposed changes in land use may affect environmental clean-up sites within Area B and asks whether an analysis concerning the impact of the land use changes on proposed remedial actions has been performed with regard to contamination clean-up levels. The individual notes that the existing clean-up levels have been developed in specific regard to the land use proposed in the GMPA. Another individual questions costs, schedule, and public review of clean-up sites, and the role of the RAB.

Response LU-5 – The commentors are referred to the discussion of human health, safety, and the environment in Appendix A (page A-6) of the EIS. As discussed, the Trust’s clean-up of non-petroleum substances, pollutants, and contaminants on the Presidio is addressed through compliance with federal and state pollution clean-up laws that include environmental data collection, analyses, remedial design and implementation, and reporting and documentation requirements separate from the PTMP and associated NEPA process. The clean-up of contaminated sites within the Presidio is still in progress. As noted by the commentor, clean-up levels are being developed to follow the land use designations set forth in the GMPA. Numerical clean-up standards are now being established for land use types (e.g., residential, recreational, commercial, etc., as well as ecological). These standards will apply to each location proposed for development. If there are changes in land use resulting from PTMP implementation, the remediation goals could change if a clean-up standard that applies to the new land use is either less or more stringent. New information regarding the Trust’s clean-up program is being evaluated as it becomes available.

Public comment on the remediation goals, costs, and schedule of activities is addressed through the clean-up process itself rather than through this NEPA process. The RAB routinely consults with the Presidio Trust, state agencies, and the NPS regarding clean-up of the Presidio. The RAB meets twice per month, and every second Tuesday is the official RAB meeting that is open to the public.