

4.17 NEW CONSTRUCTION (NC)

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NC-1. *Acceptability of New Construction*

Comments regarding new construction in the Presidio range from general support for new development to conditional support for some types of construction or construction in particular areas to complete opposition to any new construction. Several commentors state that they do not want any new construction within the Presidio for various reasons. Some commentors, such as the NRDC, feel that it is not appropriate to have construction in a national park and that a park should also not become a site of major demolition. The Pacific Heights Residents Association states, “No new construction is appropriate in a national park nor is it warranted.” A Presidio advocacy group asks that the Trust cite any mandates for new construction in federal law

related to the Presidio, and others ask the Trust to cite the federal authority, other than the self-sufficiency mandates of the Presidio Trust Act, justifying new construction in the Presidio. Several commentors state that new construction would not be justified since there are enough available buildings to achieve financial self-sufficiency without constructing new buildings. They assert that reusing the existing buildings will keep the Presidio a park and not a business compound. Several commentors urge the Trust to minimize park development, even if that means reducing some of the current services and programs, and to minimize private development and other private for-profit uses. Commentors argue that new construction is not needed because it will generate less income for the Trust and is a riskier business proposition than renting out existing buildings, and that the expense and low financial yield of new construction would not offset its undesirable effects.

Several other commentors believe that new construction is acceptable, so long as it does not occur in designated historic areas such as Fort Scott, the Main Post, or the Public Health Service Hospital or in areas that contain natural resources such as Crissy Field and Tennessee Hollow. Other commentors request that the type of construction be limited to a specific type of development or that construction be limited to the reconfiguration or renovation of existing housing units and facilities. Still others feel that development should be limited to areas that are already developed. One commentor asks that the Trust consider additional new construction in the Presidio in appropriate areas, suggesting that it would generate revenues that are necessary to maintain and sustain the park.

Response NC-1 – The Final Plan does not specifically propose new construction, but also does not preclude it. Instead, the Plan establishes quantitative, qualitative, and procedural constraints to ensure that any new construction proposed in the future is undertaken in a manner that is consistent with the National Historic Landmark District and protective of the resources and qualities that make the Presidio a special place. New construction would be undertaken only where necessary to meet Plan goals, including preservation, protection, and enhancement of natural, cultural, and recreational resources, making the park accessible to a wide cross-section of the public, and meeting the financial self-sufficiency requirement.

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Limited new construction is an accepted feature of many national parks, which often provide lodging and visitor services. Moreover, the give and take of building space (demolition and new construction) has played a role in shaping and re-shaping the Presidio from 1776 to the present day. New construction proposed at the Presidio in the future will fall into one of two categories: residential construction required to replace dwelling units removed to expand open space, and non-residential construction required to meet other Plan goals such as historic preservation. The amount of residential construction will depend on a variety of factors, and is estimated at between 200,000 and 400,000 square feet (between 200 and 400 apartments). The issue of replacement housing is discussed further in the Housing responses.

The amount of non-residential construction is unknown, but will not exceed a maximum of about 310,000 square feet. New construction may take the form of building additions, annex structures that facilitate the reuse of adjacent buildings or groups of buildings, or freestanding structures. Examples of possible new non-residential construction include the following:

- An addition at the back of historic Pershing Hall (Building 42) to make rehabilitation and reuse as lodging or apartments feasible;
- An annex to historic Stilwell Hall (Building 650) in place of the non-historic buildings to the east along Mason Street, if needed to facilitate rehabilitation and reuse as lodging; and
- A new recreation facility if the non-historic YMCA gym (Building 63) is removed for restoration of the Tennessee Hollow stream corridor.

An example of a potential annex to historic Stilwell Hall is illustrated in Chapter Three of the Final Plan. An example of possible new residential construction is also illustrated in Chapter Three, and would involve construction on the site of a non-historic building west of the Thoreau Center (Building 1028). If proposed and implemented, such a project would replace housing removed in the southern part of the park, improve the aesthetic and historic context of the Thoreau Center area, and provide a stable source of revenue for other park improvements.

There are no federal statutes that require, promote, or preclude new construction within the Presidio. The Presidio Trust Act requires that the Trust achieve, at a minimum, financial self-sufficiency by 2013. See Section 105(b) of the Trust Act in Appendix A of the PTMP. The Trust Act further requires development of a “management program” designed to “reduce expenditures... and increase revenues to the Federal Government to the maximum extent possible.” The management program is to consist of demolition of structures that cannot be cost-effectively rehabilitated, and new construction limited to replacement of existing structures of similar size in existing areas of development. See Section 104(c) of the Trust Act in Appendix A of the PTMP. The Final Plan is consistent with this statute and calls for an overall decrease in building square footage, and for replacement construction only within already developed areas of the park. Replacement construction would also have to comply with planning guidelines contained in Chapter Three of the Plan, and procedures outlined in Chapter Four. These guidelines and procedures would ensure that any new construction is located and sized appropriately, and that further analysis and public input is undertaken in a manner consistent with NEPA and NHPA.

Because the actual level of demolition and new construction will not be known until more specific plans or projects are proposed, the EIS analysis conservatively assumes that the maximum allowable square footage of new construction would occur under each alternative. This assumption is conservative because it means that resulting impacts are projected to be larger than they would be in the likely instance that less new construction occurs. EIS alternatives include a range of possible quantities of new construction, from none (Minimum Management Alternative and Final Plan Variant), up to 1.37 million square feet (Cultural Destination Alternative). The Final Plan Alternative, at 710,000 square feet, represents the middle of this range.

Commentors who fear that new construction cannot be accomplished without impairing the NHLD may take comfort from the constraints included within Chapters Three and Four of the Plan, and from existing local examples of compatible new construction. These examples include the compatible addition to the Presidio Fire Station (Building 218), and the new Presidio Golf Course Clubhouse, both of which are within the NHLD. Another local

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example is the new San Francisco Main Library, which lies within or immediately adjacent to the San Francisco Civic Center NHLD.

Contrary to what some commentators suggest, new construction offers fewer financial risks than reuse of existing buildings, and can provide a reliable revenue stream to help finance historic preservation of adjacent/nearby buildings or activities. In all likelihood, new construction would be undertaken by third parties, and not directly by the Trust, similar to the ground lease arrangement being used for the LDAC project. With this arrangement, the costs of improvements are not borne by Trust, nor does the Trust assume risks associated with cost overruns, vacancies, or declining rents. New construction can also help to obviate financial risks associated with historic rehabilitation, since a building addition or annex can help provide revenues to support the historic rehabilitation.

The financial yield from ground leases and new construction is generally less than if the Trust retained ownership over improvements, and thus generally results in less rent if one were to replace one square foot of existing, rehabilitated space, with one square foot of new space. A more appropriate comparison to make, however, is between unimproved space and new space. The costs associated with rehabilitating unimproved space are often difficult to predict with certainty, and both the costs and the associated risks can offset potential revenues to the extent that the revenues become comparable to those from new space. In the example cited above, 58 dormitory units in Building 1028 could be replaced by 100 or 150 small apartments units that could be rented at much higher rents than the units they replace. The new units could generate rents comparable to those from existing larger units, and in some cases could be more cost-effective to construct than units created within existing buildings through conversion of non-residential space to residential use.

NC-2. Replacement vs. Rehabilitation Construction

A Presidio advocacy group asks the Trust to describe the difference between replacement construction and construction related to rehabilitation/renovation of existing buildings. They seek clarification of whether construction related to rehabilitation/renovation of existing buildings is included in maximum

replacement construction estimates, and whether the expansion of the existing building space is considered part of the “building cap.”

Response NC-2 – New construction includes any additional square footage that is added outside of the existing building envelope, whether as an addition to an existing building, within an annex, or as a freestanding structure. In response to comments, these various types of new construction have been clarified in PTMP, and examples are provided. Until new construction is actually proposed, however, it is impossible to predict how much of one type versus another will be built. As described above, the total amount of new construction allowed is constrained by quantitative limits within each planning district and Presidio-wide, and the actual proposals will be subject to additional analysis and public review as required under NEPA and NHPA.

NC-3. Demolition of the Non-Historic Building Square Footage

With regard to demolition, the Sierra Club states that the Trust should demolish the two million square feet of non-historic buildings as called for in the GMPA to make the park more peaceful and less congested.

Response NC-3 – The PTMP anticipates substantial demolition where it would further the goals of the Plan. For example, Wherry Housing is planned for demolition in phases over the next 30 years in order to allow for expanded open space and habitat restoration. Buildings in the West Washington, East Washington, and Tennessee Hollow areas are also planned for demolition over time to facilitate natural resources goals. In other areas, buildings are not identified specifically for demolition, but planning guidelines suggest that view corridors may be enhanced (for example, between the Main Post and Crissy Field (Area B)), which implies the removal of non-historic buildings when feasible.

In areas where demolition is planned, the park would be “more peaceful and less congested.” Overall, the Plan provides for almost 100 acres of additional open space. Plan goals do not only involve open space, however, and the Presidio is expected to be a vital community where residents, employees, and visitors benefit from a host of public uses, and where buildings and districts are preserved through active reuse. In traditionally more dense and active areas like the Main Post, Fort Scott, Letterman, and Crissy Field (Area B), the

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Plan contends that the Presidio cannot remain a sleepy collection of mostly vacant buildings if the Trust is to succeed in its mandates to achieve financial self-sufficiency and to provide for the long-term vitality of the park. Historic buildings must be rehabilitated and reused to the extent feasible. Also, non-historic buildings may present opportunities to generate both the revenues to fund park improvements and operations, and the activities that will make the park accessible to the public.

For example, the Plan identifies the Commissary site as the preferred location for a museum, acknowledging the prominent and accessible nature of the site. The Commissary building itself is in fairly good condition, and a financial and architectural analysis may determine that it should be retained rather than removed or replaced, and that this would represent a sustainable way to accomplish Plan objectives. The GMPA called for “interim” military use of this site, and also identified the site for visitor and education land uses and long-term restoration to “natural landscape.” Other non-historic buildings along Crissy Field (Area B), including the prominent “Glass Palace” (Building 924), were proposed for removal to expand open space and provide small parking areas on the south side of Mason Street. See 1994 GMPA illustrations, pages 91-93. Given the intense use of recreational areas at Crissy Field, and convergence of people and vehicles at parking areas, it could be argued that this proposal might not be as “peaceful” and uncongested as the commentor suggests.

The EIS analyzes an array of alternatives, including a range of possible amounts of demolition, thereby facilitating consideration of a variety of possible outcomes.

NC-4. New Construction After Exhaustion of Rehabilitation/Conversion Options

Many commentors, including the GGNRA Citizens’ Advisory Commission, feel that the Trust should allow new construction only after all possibilities for conversion and rehabilitation have been exhausted. Similarly, other commentors, such as the CCSF Planning Department, maintain that the Trust’s focus should be on reconfiguring existing buildings rather than on infill development. The NRDC asks, “If housing is such a high priority, why has the Trust not allocated more space in existing buildings to residential use

and less space to other uses, such as lodging/conference and office, rather than proposing construction of new housing?”

Response NC-4 – Chapter One of the Final Plan states that the Trust will give “highest priority” to actions that carry out the preservation, rehabilitation, and use of historic buildings and landscapes, and also articulates the Trust’s policy to allow new construction only where it is in keeping with the character and integrity of the NHLD. The Plan does not preclude the possibility of new construction prior to reuse of all historic buildings, in part because new construction is envisioned as a way to facilitate rehabilitation and reuse by improving the functionality of older buildings and increasing the financial feasibility of reuse.

The Final Plan also recognizes that some new construction may be necessary to replace housing units removed to allow expansion of open space, particularly since other housing units may be removed by preserving historic residential buildings for non-residential uses. In other words, it is unlikely that all units planned for demolition at Wherry Housing (463), East and West Washington (36), and Tennessee Hollow (66) could be replaced entirely through conversion and subdivision of existing buildings without incurring substantial expense and/or compromising the historic character of residential buildings. Therefore, the Plan anticipates the need for some replacement housing within compatible new construction. The use of existing buildings and new construction for replacement of housing units is discussed further in the Housing responses.

New construction can also provide an opportunity to improve the aesthetic and historic context of the Presidio, and thus may appropriately be pursued in advance of reuse of all historic buildings. For example, as described in responses above, Building 1028, a concrete block dormitory located next to the Thoreau Center, may be replaced with more compatible new construction if feasible. This type of proposal would require more analysis and public input as described in Chapter Four of the Final Plan.

NC-5. New Construction Only If Related to Park Themes

Several commentors state that the Trust should permit new construction only for projects for which there is a demonstrated need related to park themes.

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The GGNRA Citizens' Advisory Commission also states, "No final decision about the capacity of any area to absorb significant new density should be made until detailed studies, including use, massing and types of construction are conducted. That could be part of the specific district plans. Only that which is needed programmatically should be built."

Response NC-5 – Any new construction will be undertaken in support of goals articulated in the Final Plan, such as preserving and enhancing park resources, housing Presidio-based employees, making the park accessible to a wide cross-section of the public, and generating revenues to support park operations. Though the Plan does not provide the specific locations, size, or design of new construction, it does set forth the general parameters within which these characteristics will be determined over time. For example, new construction will be limited to areas that are already disturbed or developed, and must be consistent with the planning guidelines in Chapter Three, which will ensure that the size, scale, location, and design of new construction are compatible with its historic setting and the character of the area. Quantitative limits on the amount of total square footage within each planning district, as well as limits on the maximum amount of demolition and new construction within each district, would ensure that "significant new density" does not occur in areas where it would compromise the NHLD or adversely affect the visitor experience. Thus, the "capacity" of each district would be respected. The design standards, coupled with quantitative thresholds, obviate the need for further studies at a Presidio-wide or district-wide basis. Further studies and more specific design proposals are nonetheless required before new construction is undertaken, and would be reviewed pursuant to NEPA and NHPA, as described in Chapter Four of the Final Plan. The Programmatic Agreement among the Trust, NPS, ACHP, and SHPO (included as Appendix D to the Final Plan EIS) also describes a consultation process, pursuant to NHPA, that will provide for review of more specific plans and proposals for new construction in the future.

NC-6. New Construction Only If Replacement of Similar Size

Several commentors suggest that the Trust should keep new construction to an absolute minimum and limit it to replacement of existing structures with an improvement of similar size. For example, the CCSF Planning Department

states, "Except for expansion of facilities at Letterman and the Western Medical Institute of Research, new construction should be limited to replacement of existing structures with an improvement of similar size." Similarly, the Cow Hollow Association states, "In general new construction should be kept to an absolute minimum and reuse of existing structures made a first priority." The Cow Hollow Association also indicates that the phased demolition of Wherry Housing could allow for some new construction.

Response NC-6 – The Final Plan anticipates that some new construction will be necessary to further the key goals of the Plan, although the precise amount is unknown. Given this uncertainty, the Plan places quantitative, qualitative, and procedural constraints upon how and where new construction may occur. These constraints ensure that the overall amount of building space at the Presidio will be reduced, and that new construction will only be permitted in areas that are already developed. They also ensure that new construction will be compatible with the historic character of the Presidio, and will be of a scale and design that will not compromise the integrity of the NHLD.

The Presidio Trust Act (included as Appendix A to the Final Plan) requires that the Trust's management program include new construction "limited to replacement of existing structures of similar size in existing areas of development." This is true for every area of the park, including the 23-acre Letterman Digital Arts Center. Non-historic buildings in this area were substantially out of scale with surrounding buildings, and surrounded by acres of surface parking. These will be replaced with smaller-scale structures and underground parking.

NC-7. Location of New Construction

Many commentors request that the EIS specifically identify and describe the areas where new construction would occur. Commentors also suggest that the EIS accurately disclose the allowable amount of demolition and construction proposed by the Plan. Some commentors, including the National Trust for Historic Preservation, express concern about impacts on historic buildings by stating that the Presidio Trust should attempt to reduce the development footprint and give priority to sites occupied by non-historic buildings if new construction is required.

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The San Francisco Bay Conservation and Development Commission (BCDC) states, “As land use intensities increase and a more diverse mix of land uses are introduced to the Presidio, there is a greater chance that recreation and habitat areas will be negatively impacted by additional traffic, noise, light and overuse. These impacts might be harder to avoid with additional square footage being added to Crissy Field and Fort Scott, particularly if these increases reduce the amount of land available for buffers, recreational areas, additional open spaces, and viable wildlife linkages.” The BCDC further states that the Trust should not increase density where development exists and should try to reduce the development footprint of non-historic buildings to increase land for open space, recreation, buffers, and wildlife corridors and to improve the visual character. The GGNRA Citizens’ Advisory Commission states that “no final decision about the capacity of any area to absorb significant new density should be made until detailed studies, including use, massing, and types of construction are conducted.”

Telegraph Hill Dwellers maintain that “no new buildings should be built, with the exception of replacing those [buildings] that are truly undistinguished, such as the Wherry Housing units, and are relatively out of sight.” Telegraph Hill Dwellers then go on to state that just one building in the wrong place, such as the Main Post, will spoil the distinctive “look and feel” of the Presidio. One commentator writes, “The public needs to understand how the totals for overall building square footage can be generated without seeing a specific plan for each planning district.” The Fort Point and Presidio Historic Association states, “We are particularly concerned over the draft plan’s premature commitment to expanding open space and limiting new construction to the most historically sensitive areas of the Presidio. This policy is not mandated by the Presidio Trust Act and conflicts with preservation laws. The draft plan should be modified to state that locations where open space is created by demolition of non-historic structures would be available for possible new construction.” A Presidio advocacy group asks, “What will be the maximum amount of replacement construction, demolition, and renovation that could occur in both Area A and Area B?”

Response NC-7 – The PTMP is a programmatic plan, and as such, does not identify specific locations for new construction. However, the Plan does indicate the amount of new construction that would be permitted, along with

the amount of demolition that would be permitted and the total square footage desired for each planning district and for the Presidio as a whole. These maximum amounts of construction/demolition and desired square footage could be said to establish a “development footprint” but, since no development is actually proposed at this time, should more accurately be considered as a set of parameters comparable to a city’s general plan or zoning ordinance.

In addition, the Plan requires that new construction only occur in areas that are already developed, and that it comply with both the planning guidelines in Chapter Three, and the processes and procedures outlined in Chapter Four. (The Programmatic Agreement included as Appendix D of the EIS also provides procedures required for compliance with NHPA.) These constraints are intended to ensure that new construction is compatible with historic buildings, and together with the principles regarding preservation articulated in Chapter One, will mean that sites occupied by non-historic buildings are considered for new construction. Possible examples are cited elsewhere in these responses, and include the site of non-historic buildings adjacent to Stilwell Hall at Crissy Field (Area B), adjacent to the Thoreau Center, and in the residential enclave behind the Pilots Row houses at Fort Scott.

The amount of land available for open spaces, recreation, buffers, and wildlife corridors will not decrease under the PTMP. To the contrary, the PTMP contains extensive provisions to improve the amount and quality of these features and to improve the visual character of the Presidio by removing buildings, reestablishing native habitat, enhancing natural drainages, and improving recreational facilities. The Plan will also result in a decrease in overall square footage, and thus “land use intensities” will decline.

In some areas, the Plan will allow increases in building square footage to partially replace square footage that is proposed for elimination elsewhere. In these instances, and where vacant buildings are proposed for reuse, the EIS evaluates the extent to which the increase in activity could affect historic and natural resources at the Presidio due to traffic, noise, light, and other potential byproducts of active use. Mitigation measures are provided to protect important resources and reduce impacts where necessary.

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The suggestion that the Trust should not increase densities in developed areas and should reduce the footprints of non-historic buildings would be difficult to accomplish while achieving the other key goals of the PTMP. If development is to occur only in areas that are already developed, then either densities in these areas must be increased or development must be allowed within the existing buildings' footprints. If only demolition were allowed, Plan goals such as rehabilitating and reusing historic buildings, housing Presidio-based employees, financing park operations and improvements, and more, would be in jeopardy. For example, demolition of Wherry Housing over time will eliminate revenue-generating units and replace them with native habitat. This process will not only require substantial funding for demolition and habitat restoration, but will also result in a loss of residential revenue. Thus, it is anticipated that this project will only be feasible once revenue generation is increased elsewhere. This additional revenue generation will necessarily result in an increase in activity, either within existing buildings, in new buildings, or in some combination.

It should be noted that arguments favoring less activity in the park than exists today are antithetical to the preservation of the Presidio's historic buildings, which require active reuse, and are also inconsistent with the historic character of the Presidio, which was always an active community with a wide variety of land uses. Arguments that call for less activity necessarily suggest fewer visitors as well, in direct opposition to the goals expressed in Chapter One of the Plan regarding bringing people to the park.

In response to commentors' suggestions, the amount of new construction and the overall square footage permitted in the Crissy Field (Area B) planning district have been reduced since the Draft Plan. Also, Chapter Three of the Final Plan contains guidelines to ensure that any new buildings constructed at the Main Post are located in such a way that they enhance rather than detract from the formal organizational structure of the central open spaces.

NC-8. Area A Building Space and Building Space Changes Since Adoption of the GMPA

A Presidio advocacy group inquires about the square footage caps and asks the Trust to provide the maximum amount of replacement construction, demolition, and renovation that could occur in both Areas A and B. The

group asks for clarification of whether the demolished building space in Area A will be banked and rebuilt in Area B, and also requests information regarding demolition and construction that has occurred since the 1994 GMPA was adopted. The amount of construction is requested for both Areas A and B, and for both replacement construction and construction associated with rehabilitation/renovation of existing buildings. The same group also seeks clarification with regard to building square footage, and asks the Trust to identify the square footage of each existing building in both Areas A and B and provide a list of and detail on those buildings, including the date of construction and historical designation. One individual states that the Trust should clearly define and firmly acknowledge a construction limit or cap for the Presidio in both Areas A and B. An individual asks whether the Trust plans to build "2.199 million square feet of new replacement construction in Area B (Lucas 1.489 million square feet with underground parking garage and Trust Plan 710,000)."

Response NC-8 – The PTMP is a programmatic plan that addresses the square footage of the Presidio as a whole and within each district. In response to comments, the Final Plan has been revised to remove caveats contained in the Draft Plan and clearly articulate the goal of reducing building space within Area B of the Presidio to 5.6 million square feet. Similarly, clear square footage limits are expressed for each planning district.

The PTMP applies only to Area B of the Presidio, which is the area under the jurisdiction of the Trust. The amount of demolition or new construction in Area A is not addressed, and an occurrence in one area will not affect what will be allowed in another. In other words, only space demolished and constructed in Area B will count toward the calculation of total square footage and the goal of reducing building space in Area B.

As described on page 140 of the Draft Plan, 6.3 million square feet of space existed in Area A plus Area B when the GMPA was adopted in 1994. Between 1994 and the passage of the Presidio Trust Act, the NPS demolished approximately 120,000 square feet of space, mostly at Wherry Housing in Area B, and demolished some buildings in Area A outside the Trust's jurisdiction. Today, there are about 5.98 million square feet of building space in Area B, including several examples of new construction undertaken by the

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NPS, such as the Presidio Fire Station addition and the new Presidio Golf Course Clubhouse.

The Plan does not describe building uses or treatments on a building-by-building basis. However, a list of all historic buildings in Area B (including date of construction and building number) is provided in Appendix C of the Final EIS, and a list of all existing buildings and their current square footage is available from the Trust's Planning or Real Estate Departments upon request. This information is maintained in a database that is updated periodically to include demolitions and new space, and will allow the Trust to monitor progress toward the goal of reducing the Presidio's square footage to 5.6 million square feet. Similar information for Area A may be obtained from the NPS.

NC-9. Parking Garages

Several commentors ask for clarification regarding parking garages, including whether the Trust has any plans for underground garages or garage structures, and whether the square footage of such garages is included in the building cap. A Presidio advocacy group asks the Trust to "include the LDA Letterman project underground parking garage in the total square footage under PTIP."

Response NC-9 – For purposes of calculating the amount of built space within the Presidio, above-ground parking is included in the calculation, but underground parking is not. Parking associated with the LDAC project will be below-grade and will therefore not be counted as building square footage.

The Final Plan does not propose any additional underground parking, but does not preclude its construction in the future, following additional site-specific planning, environmental review, and associated public input. Any such parking would be required to comply with goals articulated in Chapter Two of the Final Plan regarding parking management and the overall reduction in parking spaces in each planning district over time.

NC-10. Overall Square Footage Reduction

Some commentors inquire about the overall square footage reduction, asking the Trust to substantiate the claim that it is reducing the built space at "build

out." One commentor specifically asks the Trust whether the reduction in total square footage is merely a goal or if it is a commitment. The commentor questions how 5.96 million square feet could be exceeded for a "limited and reasonable time," without defining the words limited or reasonable. Another commentor asks, "The San Francisco General Plan calls for less total area of development in gross square feet in the Presidio. The Presidio Trust plan calls for substantially more development than currently exists. Why?"

Response NC-10 – The PTMP has been revised to clarify that the Trust's goal is to reduce the amount of building space in the Presidio from 5.96 million square feet to 5.6 million square feet or less over time. The Trust does not propose "substantially more development than currently exists." The goal of reducing building space will be pursued in concert with other goals of the PTMP, such as expanding open space, preserving and enhancing cultural and natural resources, making the park accessible to a wide cross-section of the public, housing Presidio-based employees, and ensuring long-term financial sustainability. See Plan Summary in Overview section of Final Plan. All of these major provisions of the Plan should be viewed as commitments, in that they are the overarching policies that will inform individual implementation decisions by the Trust over time. Just as the San Francisco General Plan contains policies and objectives related to "transit first" that guide investments and decisions about the City's transportation systems, the planning principles articulated in the Trust's Plan will guide investments and decisions about reuse, removal, and replacement of buildings within the Presidio. See Response LU-3 regarding the relationship between the San Francisco General Plan and the PTMP.

Text and figures in Chapter Four of the Final Plan contain more information regarding strategies that will be used to implement the Plan, including the goal of reducing the amount of building space over time.

NC-11. Doyle Drive

One commentor seeks clarification of whether buildings removed as a result of the Doyle Drive project would be rebuilt elsewhere within Area B. The commentor asks whether the square footage of any buildings demolished for the Doyle Drive project would be reconstructed elsewhere at the Presidio. The commentor also asks whether the replacement square footage allowed for

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these demolished buildings would be in excess of the Plan's stated levels of demolition and replacement construction.

Response NC-11 – As described in Chapter Two of the Plan, replacement of Doyle Drive is a project of the San Francisco County Transportation Authority, the California Department of Transportation (Caltrans), and the Federal Highway Administration. The Trust is cooperating with these agencies and is participating in the ongoing planning efforts because of the project's potential impacts on the park and its inevitable use of land under Trust jurisdiction. Though the Draft EIS for the project has not yet been circulated for public or agency review, the Trust understands that some alternatives being analyzed call for demolition of buildings within Area B. It is not clear whether the amount of space that would be demolished would fall within the level of demolition articulated in the PTMP for the affected planning districts, nor is it certain that the agencies involved would view those levels as limiting or binding.

If the alternative for the replacement of Doyle Drive that is selected and funded requires demolition of buildings in Area B of the Presidio beyond the levels contained in the Plan, amendment of the Plan would be required.

Square footage represented by buildings that are demolished for any reason, including construction of Doyle Drive, could be replaced elsewhere if needed to satisfy Plan goals, as long as the replacement is consistent with the limits on new construction and overall square footage established in the Plan. Replacement construction would be subject to the planning guidelines articulated in Chapter Three of the Plan, and would require additional analysis and public input as described in Chapter Four.

NC-12. Sustainable Buildings

An individual suggests that the Trust require all new structures and remodeled structures to be built in a sustainable fashion that follows the Leadership in Energy and Environmental Design guidelines developed by the U.S. Green Building Council.

Response NC-12 – The Trust plans to continue its current practice of incorporating sustainable design features and technologies where appropriate in new and renovated building space. These provisions are discussed in Chapter Two of the Final Plan, although specific standards are not articulated.