

### 4.18 HOUSING & EMPLOYMENT (HO)

#### CONTENTS

- HO-1. *Jobs-Housing Balance and No Net Loss of Housing*
- HO-2. *Existing Housing Supply*
- HO-3. *Housing Demand*
- HO-4. *Who Benefits from Presidio Housing*
- HO-5. *Housing Affordability*
- HO-6. *Condominiums, Co-housing, and Long-Term Leases*
- HO-7. *Remove Housing and Do Not Replace It*
- HO-8. *Timing/Process for Housing Removal & Replacement*
- HO-9. *Replacement Housing/Existing Buildings*
- HO-10. *Replacement Housing/Infill Construction*
- HO-11. *Don't Remove Any Housing*
- HO-12. *Wherry Housing*
- HO-13. *East/West Washington Housing*
- HO-14. *MacArthur/Tennessee Hollow*
- HO-15. *Fort Scott*
- HO-16. *Housing Plan*
- HO-17. *Impact of Housing Decisions*
- HO-18. *Incentives for Shared Housing*
- HO-19. *PHSH Questions and Suggestions*
- HO-20. *The No Action Alternative (GMPA 2000)*
- HO-21. *Leasing*
- HO-22. *Population & Employment*

#### HO-1. *Jobs-Housing Balance and No Net Loss of Housing*

The NPS asks the Trust to “reconsider its new policy of ‘no net loss of housing.’” They express concern that the new construction “used to satisfy the

stated jobs/housing balance” would threaten the status of the NHLD, and state that a jobs-housing balance should not be pursued at the expense of park resources. (“[W]e do not support the level of housing needed to achieve a jobs-housing balance at the expense of critical resources.”) A number of commentors share this concern. Some question the concept of a jobs-housing balance, and others do not agree that establishing a jobs-housing balance is an appropriate goal for a national park (“We do not feel that a stated policy using an artificial ratio of ‘jobs/housing balance’ has any place in a national park.”) (“The plan lacks an explanation of why... this is an appropriate policy for a national park.”)

Some commentors suggest that the commitment to no net loss of housing was premature given the lack of detail about resulting replacement units. Others suggest it was premature because too many questions remain: is removal of existing units consistent with the Trust’s self-sufficiency mandate, especially considering the cost of new construction? To what extent can existing non-residential buildings be converted to residential use? Is a preference for dividing large residential units into smaller units appropriate given the local shortage of housing for families? Can the introduction of new housing avoid adverse effects on historic and archaeological resources, including the NHLD?

Commentors state there is no legal requirement for employee housing or a jobs-housing balance in a national park, that at other national parks housing is being eliminated or relocated to outside park boundaries, and that the number of jobs could be reduced – reducing the demand for housing – if less non-residential space were leased. One commentor mentions, as an example, that housing is not allowed on lands held in trust by the State of California, and suggests that providing housing generates a sense of territoriality and privacy antithetical to the purpose of national parks. Another commentor asks if any other national park has a jobs-housing balance policy.

The GGNRA Citizens’ Advisory Commission and other commentors question the numeric goal of 1,650 dwelling units, asking that the goal either be eliminated or considered a “cap.” The Commission suggests that the housing goal be to meet the demand for Presidio-based full-time employees.

The CCSF Planning Department states “There are numerous General Plan policies that support preservation of the existing housing supply, and the City

# RESPONSE TO COMMENTS

## 4. Responses to Comments

supports the concept of no net loss of housing. However... Citywide System Policy 5 states that ‘No additional housing units should be constructed in the Presidio.’ Given the status of the Presidio as a National Park, the focus of the Trust’s efforts should be on subdivision and reconfiguration of existing housing. Only when it is not possible to convert existing structures into smaller units should new housing be constructed.”

Other commentors support the concept of no net loss of housing more emphatically, asking that the Trust make a jobs-housing balance a priority, retaining 1,650 units and ensuring no-net loss of housing. The Rails-to-Trails Conservancy states “One important element of sustainable, livable communities is that people live in places that are close to where they work and recreate. Providing adequate housing for expected employee base in the Presidio is essential to minimize the number of vehicle trips.” Commentors, such as the Housing Rights Committee of San Francisco, point out that housing remains the most important issue facing San Franciscans, and while the Presidio cannot cure the housing problems of the City, it can ensure that an increase of jobs at the Presidio “doesn’t add to our housing shortage.” A few commentors advocate for an increase in housing over time “to strengthen the Presidio community and ensure its long-term success.”

**Response HO-1** – The Presidio is unlike any other national park. It is a former military installation. It is a National Historic Landmark District. It must be financially self-sufficient by 2013. And it sits within the densest urban area west of the Mississippi River. This unique combination of circumstances provides many compelling reasons to maintain housing in the park, despite the absence of any legal requirement to do so.

As described in Chapter Two of the Final Plan, housing has long been an important part of the Presidio, which has had a fluctuating residential population through war time and peace time, and included 4,700 residents just before base closure.<sup>1</sup> Thus, although housing may or may not be appropriate in the vast majority of our nation’s national parks, here it would be remiss not to include housing in the park’s future. Housing provides an important link

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<sup>1</sup> 1990 Census Data.

with the Presidio’s past, with approximately 300 dwelling units and 380 group quarters located within historic buildings, and continues the Presidio’s long tradition of residential use. Housing can also help satisfy long-held objectives for the park, including providing housing to employees – thereby minimizing auto trips into and out of the park – improving the safety and security of the park at all times of the day and night, and providing revenues needed to support the operation and maintenance of the park. Residential use can also be a cost-effective way to preserve historic buildings, and can help fund capital improvements, including desired open space and landscape changes.

In response to comments on the Draft Plan, the Final Plan clarifies some of these reasons for maintaining housing within the Presidio, and also moderates the “no-net-loss” policy as suggested by the GGNRA Citizens’ Advisory Commission and others. Equally important, the Final Plan addresses concerns related to the potential for new housing to impair park resources.

The Final Plan presents the number of overall residential accommodations as a range from about 1,400 to 1,654 units, relying on housing demand and other factors to determine the ultimate number, rather than establishing the 1,654 goal through “no net loss.”

The Draft Plan’s suggestion that the Presidio should maintain its existing housing stock, is a direct descendant of the “jobs-housing balance” policy first articulated for the park in the 1994 GMPA. The 1994 GMPA suggested that sufficient housing should be maintained to accommodate over 50 percent of new employee housing demand, even if additional housing were required to provide this “jobs-housing balance” (GMPA, page 51). If the standard of meeting 50 percent of new employee housing demand were applied to a more realistic projection of employment, the result would indicate the need for 1,508 dwelling units under the No Action Alternative (GMPA 2000), and 1,654 under the Draft Plan Alternative. Draft EIS, Table 39. Thus, setting aside for a moment the issue of how/where replacement units should be provided, the Draft Plan’s “no net loss” of housing policy and the 1994 GMPA’s “jobs-housing balance” could potentially result in virtually the same number of units (i.e., about 1,650) once employment reaches levels projected under the Plan.

# RESPONSE TO COMMENTS

## 4. Responses to Comments

The PTMP rejects the implication in the 1994 GMPA and its EIS that a jobs-housing balance can be defined as accommodating 50 percent of new employee housing demand, and instead suggests that a balance consists of meeting 100 percent of adjusted demand – that is 100 percent of total new housing demand, adjusted to reflect the number of employees who are expected to actually desire housing at the Presidio. This methodology acknowledges that the location of employment is only one factor that people use when determining where they wish to live. Whether or not someone owns their home, where children go to school, where other members of the household work – all these factors contribute to locational decisions, along with the relative price of housing. Using this methodology, the Draft EIS projected an adjusted demand for 1,219 dwelling units plus some dormitory units. Minor adjustments to land use assumptions between the Draft and Final Plan brought this number to 1,172 plus dormitory units in the Final EIS. See the Response to HO-3 regarding housing demand, below.

Many commentors appear to question the no net loss of housing policy because they assume it will result in incompatible new construction, potentially threatening the status of the NHLD. This assumption is entirely unwarranted given: (1) that the significance of the District was established despite the presence of more than 800 non-historic units of varying degrees of compatibility; (2) that qualified design professionals have demonstrated in San Francisco and elsewhere the ability to successfully integrate new construction within historic districts; and (3) that the guidelines and processes established in the Plan ensure this successful integration occurs without adverse effects on the NHLD.

San Francisco's new Main Library is a good example of a major new building successfully incorporated within a National Landmark Historic District (i.e., within San Francisco's Civic Center). On a much smaller scale, additions to the Presidio Fire Station, and the new clubhouse at the Presidio Golf Course demonstrate the successful integration of new construction at the Presidio. The planning guidelines contained in Chapter Three of the Final Plan are designed to ensure that any new construction respects the character-defining features of its context, and that adverse effects to the District are avoided. The Plan's commitment to public review of all new construction save the most minor building additions, combined with the process prescribed by the

Programmatic Agreement for consultation and compliance with Section 106 of the National Historic Preservation Act, will ensure that these guidelines are effective, and that new construction does not adversely affect adjacent buildings, landscapes, or the District as a whole.

Certainly many questions remain regarding the potential for replacement housing. Among these are how many dwelling units can be created by dividing large units into smaller ones, and how many units can be created by converting existing non-residential buildings to residential use. Importantly, the question remains how and where new construction could occur. These questions will require further analysis, and the intention of the PTMP is to provide a general direction or framework within which to seek the answers. Discussions of how housing should be replaced and concerns about new construction are addressed further elsewhere in these responses to comments.

### **HO-2. Existing Housing Supply**

Some commentors question the way in which the existing housing supply at the Presidio was characterized in the Draft Plan and EIS, and ask that the numbers be substantiated. (“We question the Draft’s assumption that 1,650 housing units exist currently.”) They believe family housing units and SRO/dorm units should not be combined “as though they provide the same quantity and quality of housing to meet household demand.” They ask why the 538 group quarters “such as barracks and hospital beds” are grouped with conventional dwelling units.

Commentors suggest that the 1,654 “housing units” inappropriately include unused attic space in several Main Post buildings, and historic portions of the Public Health Service Hospital building – all of which have been converted into “virtual” units for planning purposes. They suggest that space was “double counted” because 200 SRO units were assumed to be the second floor of buildings designated for cultural/educational use at Fort Scott. (“A Trust representative has told me you currently have roughly 1089 non dorm/barracks/SRO/attic housing units (not all of which are rentable), plus 18 units in a converted nurse’s quarters. I ask that you confirm and/or clarify all of this in the final Plan and EIS. Which units are actual, which are virtual, and how many are currently available for occupancy.”) One commentor suggests that the Trust should include proposed conference, bed and breakfast

# RESPONSE TO COMMENTS

## 4. Responses to Comments

and lodging beds in housing unit counts in keeping with the former temporary use of many of these structures.

**Response HO-2** – The Final Plan has clarified that the Presidio currently contains 1,116 conventional dwelling units and 538 group quarters (barrack, dormitories etc.). Approximately 80 percent of the dwelling units and 25 percent of the group quarters are either currently occupied or have been occupied in the last year. These accommodations were in use when the Army occupied the Presidio, and are reflected in the 1990 census, which reported a residential population in the Presidio of 4,700 individuals. The neighborhood/street – and in some cases the building location – of the Presidio’s residential accommodations are provided in Appendix E in the Final Plan. Neither the units nor the group quarters included on the list are “virtual” and none has been “double counted.” Attic space in Main Post buildings, hospital beds, historic portions of the PSHS building, and any other spaces that have not historically accommodated residential use are not included in these totals.

There are several areas where the number of residential accommodations reported as existing are clearly subject to change under the Plan. These include the Nurses Quarters near the PSHS, which are currently being used for non-residential uses on an interim basis, and which under the Plan may again be used as group quarters, may be converted to conventional dwelling units, or may remain in non-residential use. Another example is some of the barracks buildings around the main parade ground at Fort Scott. These buildings were historically used as groups quarters and are considered by the Plan to include 159 such accommodations. These buildings have been vacant for some time, and were proposed for use as lodging in the 1994 GMPA. Under the PTMP, these buildings could accommodate dormitory style residences, could be converted to conventional dwelling units, or could be converted to non-residential use. These buildings are vacant and the possibility that they may be used for non-residential purposes does not affect their description as “existing” within the Plan and EIS. Market conditions and the demand for housing will be among the factors that help determine the ultimate use of these residential buildings over the life of the Plan.

### HO-3. *Housing Demand*

Several commentors disagree with the housing demand calculations in the Draft EIS, suggesting that demand for housing by Presidio-based employees was both overstated and uncertain. The Sierra Club suggests that the Trust’s housing analysis contained errors and used questionable assumptions, and asks that the Trust lower its assumptions about office employment density, using current employment densities at the Presidio rather than a regional standard, and using average rental rates, rather than the lowest rental rates available for each unit to determine demand. The Sierra Club also suggests that the Trust revise its assumption of 1.25 employees per Presidio household and suspect the actual ratio is higher than assumed and will therefore reduce the demand for separate housing units.

By adjusting the office employment density alone, the Sierra Club suggests that the demand for family housing units would be 948 rather than 1,134 as suggested in the Sedway study. They also suggest that after demolition of all scheduled units, subdivision of existing units, and conversions, the supply of 1,000 family units and additional SRO units will be sufficient to meet demand either under the Draft Plan or the Sierra Club’s Revised GMPA alternative. The Sierra Club requests that the Trust specify a realistic timetable for determining actual employment and related Presidio-based housing demand. Another commentor pointed out that future demand for housing at the Presidio is uncertain, and requests that the Trust clarify how demand will be measured.

**Response HO-3** – Future projections – whether of employment or housing demand – are by nature uncertain, and can best be supported by using generally accepted methodologies, relevant input data, and defensible assumptions. The Trust’s analysis complies with this standard and is therefore entirely reasonable. In contrast, the commentor suggests use of methodologies in pursuit of a desired conclusion that is unsupported.

For example, environmental analyses conducted by the Trust, the City and County of San Francisco, and other jurisdictions in the Bay Area routinely use employment densities that provide a reasonable representation of conditions over time. Specifically, the factor of 350 square feet per office employee is a reasonable standard for office developments outside the central business district, such as the Executive Park development on the southern boundary of

# RESPONSE TO COMMENTS

## 4. Responses to Comments

San Francisco. The standard used for office developments closer to the center city, such as in the South of Market Street or Mission Bay districts of San Francisco, is 275 or 295 square feet per office employee.

In economic boom cycles, when office vacancy rates drop and rents rise, employers can often squeeze in more workers, increasing the employment density. This occurred in recent years, when “dot.com” type businesses were routinely experiencing overcrowding, with employment densities of 150 square feet per employee or less, because of both the absence of space, and the number of growing businesses. Conversely, in lean economic times, or where a lot of vacant space is available at more affordable rents, employers can allow their workforce more room, lowering the employment density. It would be unreasonable, however, to expect either condition to continue indefinitely or to represent the norm, and therefore it would be unreasonable to use either condition as a standard for projecting the use of office space over time.<sup>2</sup>

The PTMP is a policy framework that will guide decisions over the next 20 to 30 years, and it would be unreasonable to assess the Plan based on a survey of existing employment densities, because there is so much vacant office space at the Presidio, including some that was leased by the NPS at below market rents. As buildings are filled, and as market rents are achieved, there will be a financial incentive for office tenants to utilize space more efficiently and densities will no doubt rise. A more defensible analysis – providing a conservative estimate of potential project impacts – uses a reasonable representation of conditions over time, such as the 350-square-foot-per-employee standard used by the City to analyze the Executive Park development. Using this standard and the amount of space assumed to be in office use under the PTMP, office employment at the Presidio in 2020 would equal 5,189 workers.

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<sup>2</sup> In a January 22, 2002 memo to the Trust, the Sedway Group notes that the Urban Land Institute reports that it is not uncommon for office buildings in some areas to average 175 square feet per employee, with 200 to 300 feet per employee being the norm. This memo is incorporated here by reference, and is available for review at the Presidio Trust Library.

Total housing demand is a factor of employment, calculated by dividing the number of employees by 1.563, which is the estimated number of workers per household in 2020 provided by the Association of Bay Area Governments (ABAG). The commentors do not appear to question this calculation of total housing demand, or the relative insignificance of housing demand associated with all alternatives when assessed within a regional “impact area” (Draft EIS, Table 39). Instead, the commentors focus on the estimate of “adjusted” demand – meaning the number of employees who will actually want to live at the Presidio, based on their individual situations and on the rent structure in place when the analysis was conducted.

In calculating this adjusted demand for Presidio housing, the EIS analysis used the lowest average rent across all neighborhoods for each unit type as the cut-off point for calculating net demand for that unit type. In other words, potential Presidio residents who could not afford the minimum average rent for that unit type based on their household incomes were not factored into the demand for that unit type. If the analysis had used the mid-point of the average rents for each neighborhood as suggested, this would have underestimated demand by removing from the estimate households that could afford many of the units. Also, the commentor’s premise that the current supply of units at the average minimum rent represents only a small part of the total supply of units is flawed. Approximately 62 percent of all the units surveyed were within 10 percent of the rent level identified as the “average minimum rent.” Approximately 74 percent are within 20 percent of the average.<sup>3</sup>

Calculating the adjusted demand for Presidio housing also required an estimate of the number of Presidio-based employees per household. The Presidio’s housing management company, John Stewart Company, estimated an average of 1.25 by reviewing their database of Presidio residents.<sup>4</sup> Although an actual survey of Presidio households could refine this average,

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<sup>3</sup> Ibid.

<sup>4</sup> Presidio Trust Housing Demand Analysis, Sedway Group, July 26, 200, page 5.

# RESPONSE TO COMMENTS

## 4. Responses to Comments

there is no evidence to suggest it is inaccurate or inappropriate for use in the assessment of adjusted housing demand over the 20- to 30-year life of the PTMP.

As stated earlier, projections of future conditions – whether related to employment or housing demand – are by nature uncertain. Thus, though projections can be supported as a reasonable basis for analysis of potential impacts over time, actual employment levels and actual housing demand will need to be determined by surveys or measurements undertaken at specific points in time. This fact is acknowledged in Chapter Four of the Final Plan, which describes monitoring housing demand as part of monitoring the Plan’s overall effectiveness. It should be noted, however, that until the Presidio is fully occupied – which is not projected to occur for 20 years or more – surveys of actual employment and housing demand will have to be supplemented with projections to determine likely conditions at 100 percent occupancy. Thus, uncertainty will remain, along with the need to undertake reasonable analyses using generally accepted methodologies, relevant input data, and defensible assumptions.

### **HO-4. *Who Benefits from Presidio Housing***

Many comments address the issue of who should benefit from housing at the Presidio and how units should be made affordable. The question is asked whether housing would be affordable for workers within the park and what subsidies would be offered. They suggest that if housing is not made affordable to workers and occupied by them, that it should not exist within the park. Some commentators suggest that using housing solely for Presidio-based employees would be too restrictive – like the company towns of the early industrial revolution – and that more diversity would result in a stronger community, which is less “exclusive” and “insular.” One individual states “Such a policy would dilute the potential for the social vigor and diversity found in the open communities that form the strength of this country. As the Bay Area’s occupancy demand rates have grown and are forecast to grow (DEIS Table 12) it would be socially unwise to close this community’s potential to a few of the market-based households, and the ideal of a community.” Some commentators suggest that the demise of the “dot-com frenzy” should remove any pressure on the Presidio to provide housing for

San Franciscans at large, and that the original GMPA concept of offering first access to employees working or participating in programs at the Presidio should be perpetuated.

UCSF expresses an interest in student housing and related educational opportunities, asking that the Plan be more specific regarding the types of proposed residential uses, the number of units that will be made available to non-Presidio employees, the potential tenants and institutions that may qualify for the housing, and whether or not rental rates below market will be available within each planning district. San Francisco Beautiful, supportive of using housing for Presidio-based employees because of transportation benefits, suggests that “should there be times when the housing stock exceeds Presidio demands, the Trust could consider opening the excess to Golden Gate Bridge District employees who work in or around the toll plaza.”

Some suggest that low-income housing would be inappropriate, and would not be maintained properly. One individual advises “Do not use the housing stock as an attempt to address the shortage of low income housing in San Francisco. Use the housing to generate revenue, we’ll need it.” Others devote substantial attention to the issue of affordability. See Response HO-5 below. Suggestions to use the housing for the homeless are countered by suggestions that the homeless not be allowed, with some suggesting that the Trust “charge the going rate of rental in SF times 1.5, and please be very strict in renting policies.” Other suggestions include housing short-term interns (such as AmeriCorps) in the Presidio, using Wherry Housing for medical and San Francisco State students, and renting the housing at market rates, with the park staff given precedence at a lower rate.

**Response HO-4** – Comments expressing preferences for who should occupy Presidio housing demonstrate the wide variety of opinions regarding this issue. While it would be infeasible to satisfy everyone, Chapter Two of the Final Plan does provide clear statements regarding housing preferences and occupancy:

“The Presidio Trust will continue to give housing preferences to full-time Presidio-based employees as a way to accommodate employee housing demand and reduce automobile traffic in and out

# RESPONSE TO COMMENTS

## 4. Responses to Comments

of the Park....Remaining units will be made available to the general public.”

“Rehabilitating and converting historic non-residential buildings to residential use may prove to be an excellent historic preservation strategy regardless of the demand for housing by Presidio-based employees....For that reason, senior housing or other residential uses...[including] housing that supports an educational institution” may be considered.”

Housing provided in other alternatives would either be wholly consistent with these statements, or would be exclusively reserved for Presidio-based employees.

The Plan is programmatic in nature and its policies and objectives will be used to guide future decisions. The Plan does not and cannot prescribe precise numbers 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.

### **HO-5. Housing Affordability**

Housing affordability is addressed in some detail by a number of commentors, many of whom feel that the Presidio should provide housing at a full range of pricing to match the Presidio workforce pay scales. The City and County of San Francisco Planning Department points out that the “affordable housing issue is discussed only briefly in the Draft EIS and not at all in the Draft PTIP.” Similarly, UCSF points out that there are also no stated principles regarding rental rates and whether or not any “below market” housing will be offered. Others ask what the incomes will be of households of permanent residents of the Presidio, and what the ethnic and racial make-up will be of the permanent residential population.

Commentors suggest that the Trust should make 10 to 15 percent of housing available to low-income tenants at subsidized rates, and that the Trust preserve a reasonable portion of the housing for students and families with children. Some suggest that a portion be designated as subsidized housing for the

elderly, with elderly retired from the military receiving first preference. Others suggest that the Trust provide reduced housing rates for teachers, and that renters could be allowed lower rental rates in exchange for refurbishing the homes.

The strong sentiment is expressed that diversity adds strength in a community, and that the Trust should continue to support and expand ways to keep housing affordable for all socioeconomic groups. The Youth Commission’s Culture and Urban Environment Committee asks the Trust to “preserve a reasonable capita of the housing stock within the Presidio for persons of low income, particularly youth of the ages of 18-23, as well as provide affordable housing for families with children.”

Commentors suggest maintaining the current preferred rental program, and suggest changes such as raising or eliminating the current quota on program units, and accommodating more rangers and maintenance personnel. Presidio tenants suggest that the Trust provide an incentive package for nonprofit organizations that encourage their employees to work and live in the Presidio. Food Land and People offers “Perhaps the nonprofit employer could receive a reduction in office rental, and nonprofit employees who live at the Presidio could receive reductions in housing rent.” San Francisco Conservation Corps believes “that the continuation of the preferred housing program, along with affordable leasing of space to non-profit organizations, will be vital for maintaining the diversity of the Park’s culture.”

**Response HO-5** – Though the PTMP does not set aside a specific number of housing units as affordable, and presents the number of overall residential accommodations as a range from about 1,400 to 1,654 units, the Final Plan proposes to perpetuate a mix of affordable and market-rate housing opportunities by continuing current affordability programs, and adjusting them as necessary in the future. Adjustments that may be considered include revising rental rates, increasing the numbers of units within the program, and other suggestions provided by the commentors.

As stated in Chapter Two of the Final Plan, “The Trust currently provides discounts for some Presidio-based employees who earn less than median income, in order to enable them to live in the park. Rents for these units are set at rates that are consistent with national affordability standards. A public

# RESPONSE TO COMMENTS

## 4. Responses to Comments

safety housing program offers discounted rents to Presidio firefighters and U.S. Park Police officers. Dormitories and other single-room-occupancy or studio units accommodate one and two-person households at a variety of rental levels. These housing programs will be maintained and adjusted as necessary to accommodate a diverse tenant mix.”

With the exception of housing for officers of the Presidio Fire Department and the U. S. Park Police, rental rates are not proposed to be based on occupation (e.g., lower rents for teachers or employees of non-profits). The Plan will continue to give housing preferences to Presidio-based employees and others. All income-eligible employees can participate in current affordability programs.

At present, approximately 80 percent of the conventional dwelling units and 40 percent of the other residential accommodations at the Presidio are occupied. Of these, about 19 percent of the dwelling units and 100 percent of the other accommodations are set aside indefinitely as “affordable,” meaning that rents do not exceed 30 percent of combined household income. The following is a breakdown of those units:

### ***Dwelling Units***

1. Preferred Rental Program: 125 units set aside in five designated neighborhoods.
  - Units are available to full-time Presidio-based employees earning up to 100 percent of the area median income, as defined by the U.S. Department of Housing and Urban Development (HUD). Rents are equal to 30 percent of combined household income, including utilities.
2. Public Safety Housing Program: 40 units set aside throughout the park.
  - Units are available to designated full-time officers of the U.S. Park Police or Presidio Fire Department. Rents are equal to either 25 percent or 30 percent of an officer’s salary, including utilities.

### ***Single Room Occupancy Units***

1. Letterman Apartments: 58 units in the complex, with 24 units currently available for leasing to one- and two-person households.
  - Units are available to full-time Presidio-based employees earning up to 100 percent of the area median income, with first preference going to people earning up to 50 percent of the area median. Monthly rents range from \$475 to \$525, including utilities.

In addition, single room occupancy units serve the Swords to Ploughshares organization, interns, and others at below the rates available elsewhere in the City.

Certain general demographic information is or will be available in the future. This includes data on average household size and the income levels of people participating in discount housing programs. Other information, including ethnicity, age, gender, etc., is either not compiled or not available for disclosure, per federal fair housing standards. Also, as discussed in Response HO-4 above, housing for seniors and housing that complements educational institutions may provide efficient ways to reuse historic buildings or support other desired land uses.

Because of the historic nature of many dwelling units, the Trust does not generally envision providing discounted rent to individuals who would fix up their homes at their own expense. However, if compliance with historic preservation requirements can be assured, there is a potential for limited use of this strategy and for longer-term leases than the current one- to three-year norm.

### ***HO-6. Condominiums, Co-housing, and Long-Term Leases***

Related to the issue of who should benefit from housing at the Presidio, are questions and suggestions about how that housing should be made available. Commentors ask whether all housing at the Presidio will be exclusively rental housing, or whether condominiums will be allowed. Some suggest that units be set aside for co-housing, whereby several unrelated individuals share a large residence cooperatively, suggesting this as a “great solution in a city

# RESPONSE TO COMMENTS

## 4. Responses to Comments

with many single people and a housing shortage.” Others suggest that permanent residents are needed to both maintain the tone of the Presidio, as well as to reduce crime and increase volunteer activity. (“People who own or have very long-term leases, have a strong interest in maintaining their neighborhoods. Establish architectural standards, then auction 99-year leases on the housing units to the highest bidders. Require that the lessees bring the interiors up to modern building standards at their own expense while keeping the old exteriors.”) One commentator suggests that a portion of the housing units should be managed as time-shares or resort units.

**Response HO-6** – The Presidio is owned by the federal government, and the Trust is precluded from disposing of the property by selling any portion. For this reason, traditional condominiums – where the occupant owns their unit – would not be feasible, and all the housing at the Presidio will remain rental housing.

The Trust does not currently lease dwelling units for longer than three years, although some group quarters – like those occupied by Swords to Ploughshares – have been leased for longer (i.e. ten-year lease with ten-year option). In the future, long-term leasing may be used as a strategy for funding the rehabilitation of historic resources and accomplishing other Plan goals. This strategy will be used carefully, however, because the Trust must not accomplish these goals at the expense of making the Presidio an exclusive enclave or resort – neither of which were the intention of the Trust Act. Co-housing and other non-traditional forms of housing are identified in the Final Plan as potential ways to reuse some large historic houses and ensure a diversity of residential tenants: “Both group housing and co-housing may also be considered as a way to reuse a limited number of large historic homes.”

### **HO-7. Remove Housing and Do Not Replace It**

Some commentators suggest that housing is not an appropriate use within a national park, and therefore that all non-historic housing should be removed and not replaced. (“Providing housing for San Franciscans (regardless of financial status) should not be a priority for the plan. I support the preservation and reuse of the historic residential buildings but not the use of non-historic low-density buildings such as Wherry Housing or the building of new housing within the park. These structures should be phased out of use

and returned to open green space. Public housing is San Francisco’s problem, not the Presidio’s.”) These commentators typically suggest that all non-historic housing should be removed in phases over a projected 30-year period, similar to the schedule proposed in the Draft Plan for Wherry Housing. However, “If progress exceeds expectations, this schedule could be shortened.”

Many feel that housing should be kept to a minimum (one commentator says “drastically reduced”) in order to preserve the park, and are of the opinion that the remaining housing should be used only for Presidio-based employees. Many also indicate that when housing is removed, it should not be replaced, or it should be replaced only within existing buildings. The NPS recommends that “residential uses at the Presidio be restricted to existing structures, that the Trust must provide housing at a full range of pricing to match the Presidio workforce pay scales to support the goal of sustainability, and that housing areas proposed for removal be phased out as soon as financially possible to allow for parkland restoration.” Another commentator suggests that no housing should be removed as long as rent revenues are essential to meeting the Presidio’s financial self-sufficiency mandate; but once financial goals are met, and once the demand associated with Presidio-based employees is met, then non-historic housing should be removed.

**Response HO-7** – The commentators state preferences for removing housing, keeping housing to a minimum, replacing housing only within existing buildings, providing housing at a range of rents, and using housing to generate rent revenues in the short term, and to house Presidio-based employees in the long term. Many of these preferences are addressed in the responses above, and are reflected in the Final Plan.

Under the PTMP, the square footage devoted to housing in the park will be reduced over time through the removal of non-historic buildings containing 565 dwelling units for open space expansion, and removal or conversion of a number of other residential accommodations to non-residential use (between 50 and 380 units.) Housing removal will be accomplished in phases once the revenue generated by the housing is replaced by other sources. The Trust will prioritize replacement of housing within existing buildings, and has as its goal accommodating Presidio-based housing demand. At build-out, the number of

# RESPONSE TO COMMENTS

## 4. Responses to Comments

residential accommodations will be between 1,400 and 1,654, and will never exceed the current number (1,654).

The following are not proposed: removing all housing; removing all non-historic housing; and precluding the replacement of housing in the park – whether within existing buildings or within compatible new buildings. This is because housing has always been an essential feature of the Presidio’s landscape, and is critical to the character of the place. Housing can also help meet important plan objectives: residential use is a cost-effective way to preserve buildings and the most reliable source of long-term revenue; housing Presidio-based employees can minimize auto traffic into and out of the park; and residents add to the vitality, safety, and security of the park and its resources.

### **HO-8. *Timing/Process for Housing Removal & Replacement***

Some commentors address the process that should be used for removing housing, indicating that the Trust should remove non-historic housing provided that new replacement housing is constructed first, that replacement housing should be provided in existing buildings prior to new construction, or indicating studies that should be accomplished before housing is replaced. (“Before additional housing units are considered, whether through adaptive reuse or new construction, studies being prepared to ‘refine workforce demographics and housing demand projections’ should be completed...”) The Planning Association for the Richmond suggests that Wherry Housing should be removed in reasonable increments corresponding to the creation and leasing of replacement housing in reconfigured buildings. The Sierra Club letter suggests prior to removing Wherry Housing, the supply of existing housing in areas not scheduled for demolition should be increased to the maximum extent feasible through sub-division and conversions of non-residential buildings to housing. Acknowledging an ongoing tension between the goal of creating more contiguous open space and the need for replacement housing, SPUR indicates support for the objective of removing non-historic housing, provided that new replacement housing is constructed first.

Others ask the Trust to explain whether construction of all new housing will be delayed until after all planned subdivisions and conversions are completed, and to explain whether available residential units allocated to business tenants

under PTMP will be reallocated to housing before construction of new housing takes place. Commentors suggest that the Trust should ensure that all existing housing is employee-occupied before providing replacement housing. They request that the Plan and/or EIS address the timing or sequence of implementation. (“Only the timing of Wherry housing demolition appears in the EIS description of alternatives.”) They also wish to know where reuse and development is proposed to occur and when. (“The Trust’s housing plan should specify a sequence of reconfigurations and conversions to increase the supply of suitable units.”) One commentor states definitively that the Trust’s housing plan should call for no new construction during the 20-year plan period. (“If it is determined later that construction of new housing should be considered, the Trust should conduct a revised housing planning process at that later time.”)

**Response HO-8** – The timing of housing removal will hinge on the cost of demolition and follow-on restoration of open space, the ability of the Trust to fund these costs, and the ability of the Trust to replace losses in revenue associated with removal of housing units. These factors suggest – as do the commentors – that housing removal will be phased incrementally over the next 30 years, as replacement housing is created, and as non-residential lease revenues increase.

As a policy document, the Plan does not specify an order in which specific activities will occur, but does anticipate that housing demand will be monitored over time, and will be reassessed prior to any new construction. To provide a rigid list of implementation actions – defining precisely where and when housing would be removed and replaced – is outside the scope of the current planning exercise, and would be unrealistic given the 20- to 30-year time frame involved, and the likelihood of changes due to external factors. The PTMP provides a policy framework for future implementation decisions that allows for adjustments in approach if market conditions change, if housing needs or household characteristics change, and when we learn more about where and how replacement housing can be accommodated.

At a macro level, the Plan anticipates that any replacement housing required to meet Plan objectives, such as housing Presidio-based employees or preservation of an historic building, will be provided before existing housing

# RESPONSE TO COMMENTS

## 4. Responses to Comments

is removed. This means that any employee-housing demand met by the existing units can be accommodated without interruption, with employees moving from one unit to another.

The Plan also indicates that providing replacement housing within existing structures will be a priority, although the number of units that can be created by dividing existing units or converting existing buildings to residential use is only generally understood at this time (anywhere between 270 and 570 units). Site-specific building assessments will be required to determine the actual potential. Many of these assessments, and the identification or implementation of many potential units will be undertaken prior to any proposals for new construction. New construction may, however, be considered before all replacement units within existing buildings are constructed. Consideration would involve additional analysis, public input, and agency consultation. While no additional Presidio-wide housing study is anticipated, any analysis of individual replacement housing projects will necessarily reference the assessment of potential cumulative effects contained in this EIS, and update or refine that assessment as necessary.

### **HO-9. Replacement Housing/Existing Buildings**

For those commentors who favor removal of non-historic housing and its replacement, a large number indicate support for replacement of housing within existing buildings. The NPS summarizes this sentiment, recommending that “the Trust rely on existing structures to provide any housing that is required ... Conversion of non-residential to residential, or subdividing large units to smaller ones where compatible with historic preservation guidelines, should be used to meet housing goals... Only when it is not possible to convert existing structures into new smaller units should new housing be constructed.” PAR suggests that the Trust revise the Draft Plan to state that the Trust will concentrate on renovating and subdividing existing buildings for housing instead of building new housing structures, and voices support for the subdivision of existing buildings for a reasonable amount of housing.

Many commentors point out that converting large units to smaller units is the most efficient strategy to provide additional housing, and one maintains that a detailed cost benefit analysis shows that keeping the significant housing

infrastructure is the correct strategy both long term and short term.

Commentors suggest that historic housing at Fort Scott, Main Post, and East Housing be rehabilitated and subdivided to the extent feasible to provide more, smaller units per building. Some couple support for dividing large residential units into smaller units with a suggestion that converting non-residential space to residential use be pursued diligently. (“The demand should be satisfied first through the conversion or rehabilitation of historic buildings and the designation of the PSHH for conversion to housing.”) However, the Richmond District Democratic Club believes that the “cost to remodel, rewire, and replumb large housing units to create smaller ones would outweigh the revenue gained.”

The Sierra Club suggests that the EIS analysis underestimates significantly the supply of family housing units after conversions, and suggests that with minimal expansions in square footage, large existing units could be subdivided into so many units, that when combined with conversion of some free-standing garages and basements with above-ground entries, the total supply could reach 1,010 units, even after non-historic units are removed.

Some commentors, opposed to the idea of new construction, support reuse of existing buildings because of fears that new construction could impair the National Historic Landmark District. Others suggest that new construction might be considered once subdivision and conversions were complete. (“If the reconfiguration of PSHH is infeasible, we would not oppose a limited amount of housing construction at the site.”) For some, it is an issue of timing or priority. (“New housing construction should not be considered until all buildings that are suitable for conversion to housing or subdivision are identified and reused.”) Others suggest that the potential reuse of existing buildings and reconfiguration of existing housing units should determine the ultimate housing count.

While there are many supporters of subdividing large units, some of who urge converting the Presidio’s historic buildings into new and varied forms of housing, others advocate for retaining large family units, instead of creating many smaller studios. For some, the whole issue raises questions, such as “to what extent can existing non-residential buildings, both historic and non-historic, be converted to residential use?” And “Is a preference for subdividing

# RESPONSE TO COMMENTS

## 4. Responses to Comments

residential buildings into smaller housing units appropriate in light of the local shortage of housing for families?” “Are there existing nonresidential buildings, historic or non-historic that can be converted into residential use?”

The PHRA recommends that a new alternative should be analyzed which focuses on the subdivision of existing buildings to supply housing units for park employees – but only after the need for housing as been demonstrated. Others suggest that all large units (e.g., 1,000 square feet or larger) should be subdivided to make two units, and that smaller units would be more affordable. One individual remarks “The Presidio Housing Conversion Study... suggests the extent to which any additional Presidio housing needs can be met through conversion of existing buildings – with no new construction at all. Focusing on some 125 existing buildings which currently provide 289 housing units, the study shows how adaptive reuse and interior reconfiguration of those buildings could turn 289 units into 830 units; a net gain of over 500 units, with no deleterious impact on buildings which are historic. And that’s just for the 125-odd buildings studied, which are only a small subset of the Presidio’s total building stock!” Another commentor suggests that through subdivision of large non-historic buildings such as those at East Housing, North Fort Scott, and Washington Boulevard, and by converting portions of the PHS to residential use, approximately 1,400 affordable units could be provided cost effectively.

**Response HO-9** – The Final Plan is consistent with many of the commentors’ suggestions, and identifies subdivision of existing large dwelling units and conversions of non-residential buildings to residential use as efficient ways to provide replacement housing within existing buildings. Three other alternatives assessed in the EIS, as well as the Final Plan Variant assessed in response to public comments, would also utilize subdivisions and conversions to create replacement housing. Attachment B to Appendix K in the Final EIS has been revised to clarify the number of units assumed to be removed, retained, or created under each alternative in a manner that is more understandable than that provided in the Draft EIS and in a manner consistent with Chapter Two of the Final Plan.

Because only one preliminary building-specific study of the potential for subdivision/conversion has been undertaken to date, it is unclear precisely

how many units can be economically created in this way without adversely affecting historic structures. As described in Chapter Two of the Final Plan and noted by a commentor, the Presidio Housing Conversion Study concluded that unit subdivisions were worthy of consideration in many of the buildings investigated. Specifically, the study reviewed a subset of all Presidio buildings and concluded that “some building types offer the Trust a good opportunity” for subdivision or conversion, “and can be reasonably pursued,” that others “are worthy of more study... but may be more suited to other uses,” and that some appear “quite unpromising.” Of the 135 buildings examined, 57 were considered to have “high” suitability, potentially resulting in 243 new units. This conclusion was “intended only to suggest which buildings are more promising than others ... [and was not intended to] be used for budgeting.”

Based on this initial assessment – which included analysis of some of the most likely buildings with potential for new units – the Plan estimates the number of new units that could be created at anywhere between 270 and 570, and anticipates that further building-specific investigations will be undertaken. For example, further study of the Public Health Services Hospital will be required to determine both how many residential units can be accommodated, and how many would be required to generate the revenues to make rehabilitation of the building financially feasible.

The suggestion by the Sierra Club that small building additions would allow large units to be divided into multiple smaller units also requires further site-specific investigation to determine physical and financial feasibility. Many Presidio buildings – those in the East and West Washington neighborhoods, for example – have simple floor plans that easily lend themselves to subdivision; in this case from two four-bedroom units to four two-bedroom units. Other buildings are less easily understood, and would require careful analysis. Even if physically feasible, subdividing some units may not be financially justifiable if the cost of vacating the units, installing additional kitchens, and making other required improvements cannot be amortized over a reasonable period of time.

The Final Plan does not comply with the suggestion of some commentors that subdivisions and conversions be used as the only means to provide

# RESPONSE TO COMMENTS

## 4. Responses to Comments

replacement units, nor does it eliminate the potential for some new construction before all potential subdivisions and conversions have been identified or implemented. Instead, the Final Plan suggests that both subdivisions/conversions and new construction will be pursued as replacement strategies if needed to meet Plan objectives, and provides quantitative, qualitative, and procedural constraints on the number of total units, and the number provided through new construction. The number of units will not exceed the current supply of 1,654, and the number replaced via new construction will not exceed 400. New construction would only occur in already developed areas, would be compatible with the National Historic Landmark District, would comply with the planning guidelines contained in Chapter Three of the Final Plan, and would be subject to additional analysis, public input, and agency consultation consistent with requirements of NEPA and the NHPA.

### **HO-10. Replacement Housing/Infill Construction**

Many commentors oppose new construction, and therefore oppose replacement housing if new construction is involved. These commentors challenge the Trust to justify why new construction is necessary to achieve housing goals, and question those goals. (“No construction of new housing should be included in the Plan.”) These commentors suggest that the Trust must provide stronger justification in the EIS and supporting documents for new housing construction, and must show that new housing construction is “unequivocally essential” during the 20-year Plan period.

Many of those commentors who do not oppose new construction per se ask that the Trust consider new construction of housing only as a last resort when reasonable alternatives are lacking. (“New housing should only be constructed to satisfy Presidio-based demand and only after all possibilities for conversion and rehabilitation have been exhausted.”) Commentors suggest that the Plan be amended to make clear that no new housing construction will be undertaken until the inventory of all buildings that may feasibly be converted to housing or appropriately sub-divided is exhausted. The CCSF Planning Department states likewise “Only when it is not possible to convert existing structures into new smaller units should new housing be constructed.”

Some commentors, including the Sierra Club, urge that the Trust explain to the public the basis for any new construction of housing to satisfy Presidio-based demand and guarantee public involvement in the review process. The Sierra Club noted the process for public involvement in Trust major decisions affecting use of existing buildings, demolition and new construction is not assured. One commentor states “The arbitrary condition that there be no loss of residential housing units has a large influence on the PTIP and the national park in general. Please explain how an arbitrary decision with such important impacts to the Presidio’s future can be made without public discussion, EIS analysis or conformance to national park guidelines.”

Some commentors ask that the Trust limit new construction to replacement of removed structures and to locations consistent with resource protection. The NPS asserts “New construction in the Presidio should only be considered when no reasonable alternatives exist and when it can be clearly shown that there will be no adverse effects on the cultural and natural resources.” Other commentors offer different suggestions about the location of replacement construction. San Francisco Beautiful indicates support for removal of all non-historic housing and associated infrastructure in the South Hills, and along Quarry Road and MacArthur Avenue in East Housing. Along with this, the organization supports replacement within other housing complexes, primarily on the periphery of Fort Scott, at West Letterman, and in a rehabilitated PHSH and its immediate surroundings. (“If that proves insufficient, East Housing might take some infill... Infill housing should exhibit historically and architecturally compatible design, massing, and materials, and be sized appropriate to the Presidio’s residential market.”)

Others suggest that if new housing construction is justified by Presidio-based demand, the Trust should look to infill opportunities first in the southern portion of the PHSH district, second in north and east Fort Scott, and third in the West Letterman area. One commentor specifically opposes any additional housing in the Letterman district. Another states the conviction that new housing properly sited can be of the quality a national park deserves. Another asks that the footprint of housing be dropped dramatically – with higher rise buildings preferred.

# RESPONSE TO COMMENTS

## 4. Responses to Comments

Commentors ask for more specificity in the Plan, requesting that the Trust explain its intentions as to what time, under what circumstances and in what planning districts new housing will be constructed. Other questions include: where would replacement units occur? While adjacent transit is highly desirable, are the highest activity areas appropriate for housing? What is the financial justification for removing housing units and replacing them with new, more expensive units? How will this benefit lower income employees at the Presidio? UCSF asks for clarification as to how many housing units exist or are proposed in each planning district, and how many would be available to other entities.

**Response HO-10** – The Final Plan suggests that replacing housing that is removed to expand open space or preserve historic buildings is likely to be critical on several levels. First, replacement housing will likely be needed to satisfy employee demand, reducing traffic in and out of the park, and as a way to preserve historic buildings and complement proposed uses (such as educational institutions). Also, replacement housing would provide a reliable source of income, would perpetuate a historic land use, enforce an overall sense of community, and contribute to the safety and security of the park. Chapter Two of the Final Plan provides more detail on these issues.

As noted in previous responses, the Final Plan suggests that both subdivisions/conversions and new construction will be pursued as replacement strategies, as do three other alternatives considered in the EIS. In the Final Plan, this dual approach to replacement housing is based on several factors. First, based on the number of housing units that are proposed for removal to create open space (565), on the additional number that may be removed or converted to non-residential use to facilitate preservation and reuse of historic buildings (50 to 380), and on the potential for replacement within existing buildings (270 to 570), some new construction is likely to be required.

Second, there are areas in the park where existing non-historic housing is both unattractive and inefficient, and replacement with new construction could enhance the appearance of the park and the character of the National Landmark Historic District. The area immediately west of the Thoreau Center is one such location, where 58 units of non-historic housing is provided in concrete block dormitories that could be replaced with new construction more

compatible with the NHLD and more in keeping with the scale and architecture of the low-scale hospital buildings that historically occupied the site. This site is illustrated in Chapter Three of the Final Plan, in an artist's rendering that suggests one possible configuration for the site.

Commentors who fear that new construction cannot be accomplished without impairing the NHLD, and who seek more specifics regarding the location of new construction, may take comfort from local examples of compatible new construction cited elsewhere in these responses, and from the quantitative, qualitative, and procedural guidelines provided in the Final Plan. The number of total units will not exceed the current supply of 1,654, and the number replaced via new construction will not exceed 400. New construction would only occur in already developed areas, would be compatible with the NHLD, would comply with the planning guidelines contained in Chapter Three of the Final Plan, and would be subject to additional analysis, public input, and agency consultation consistent with requirements of NEPA and the NHPA.

Commentors who fear that subdivision of larger units into smaller ones will result in less affordable units and diminish the supply available to families, may be interested in the unusually large supply of very large units at the Presidio, and the projection of demand undertaken by the Sedway Group. At the time the demand study was undertaken, 725 dwelling units were occupied, and over 25 percent of these were four- and five-bedroom units. Forty-five percent were three-bedroom units. For the Final Plan, the adjusted demand for housing (i.e. Presidio-based employees desiring housing at the Presidio) was estimated to be more weighted towards smaller units, with 65 percent desiring one- and two-bedroom units, 22 percent desiring three-bedroom units, and only 13 percent desiring four bedrooms or more.<sup>5</sup>

Because these projections are just that – projections – and therefore subject to change, they point to the need to further assess demand over time as the feasibility of subdivisions are investigated, and as they are implemented. The Final Plan would monitor housing demand, and commits to maintain a diversity of unit types. The number of overall units provided in each planning

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<sup>5</sup> Sedway Group, Presidio Trust Housing Demand Analysis, July 26, 2001.

# RESPONSE TO COMMENTS

## 4. Responses to Comments

district is presented in Chapter Two, usually in terms of a range of possible outcomes depending on future implementation decisions. Presidio-based employees will continue to receive preference for housing, and are expected to occupy most units at build-out of the Plan. In the interim, opportunities for housing are provided to the general public, although the precise number available at any specific point in time cannot be determined with certainty.

The Final Plan Variant assessed in the EIS would provide replacement housing solely within existing buildings, and thus provides the commentors with some sense of the impacts and benefits associated with this strategy. Again, because the number of units that would be converted to non-residential use and the number of replacement units that can be achieved within existing buildings is not known with certainty, the effectiveness of this strategy can only be estimated. As presented in the Final Plan Variant, approximately 970 units would be demolished or removed, about 430 units would be replaced, and about 1,100 total units would be available – or about 540 less than exist today. Housing totals for the Final Plan Variant were calculated based on maximizing conversions or subdivisions of existing buildings with no new construction. Based on the suggestions of commentors, the same housing units were removed in the Variant as in the Final Plan, with the few additional removals on Sanches. No housing was removed for construction of infill housing. To obtain the maximum number of units within existing structures, all buildings were subdivided into the maximum number of units regardless of cost or suitability based on the Presidio Housing Conversion Study by Page & Turnbull, Inc., Solomon E.T.C. Some residential buildings were converted to non-residential uses such as education or lodging. All of the historic Public Health Service Hospital was converted to residential use.

See Response HO-1 regarding the no net loss of housing policy for clear demonstration that related housing issues are not being pursued (“without public discussion”). Also see Response HO-17 regarding NPS housing policies, and responses to New Construction comments.

### **HO-11. *Don’t Remove Any Housing***

Several commentors disagree with the Plan’s proposal to remove housing, providing the following reasons: replacing housing is a lengthy and difficult process; investment in replacement housing will be orders of magnitude

greater than rehabilitation costs, and rehabilitation can extend the useful life of units for 30 to 50 years; returns on capital invested in existing units will be substantially greater than returns on new units; and existing units provide an affordable housing component for low-income families and students. (“We do not feel that Wherry, East & West Washington Housing or any other potential housing should be demolished and rebuilt elsewhere. Demolition of existing income-producing housing is not consistent with the Trust’s mandate for financial self-sufficiency.”)

These commentors assert that housing should remain where it is now, with one suggesting that the proposed demolition of Wherry and other housing does not meet the Presidio Trust Act’s requirement that buildings be removed if they “cannot be cost-effectively rehabilitated.” The commentor suggests that the buildings in question do not need rehabilitation, and the Trust Act authorizes demolition of only those structures which need rehabilitation that cannot be done cost-effectively. Another suggests that preservation of rare plant species is not a credible reason to remove Wherry Housing. (“Page 106 of the DEIS cites an instance of successful replanting of a colony of the SF *Lessingia* by the US Army. It would seem that we should be able to do at least as well as the army in ensuring the survival of these rare plants without demolishing the Wherry housing.”)

**Response HO-11** – The commitment to remove Wherry Housing is a longstanding one, first articulated in the 1994 GMPA, and is founded on an

# RESPONSE TO COMMENTS

## 4. Responses to Comments

understanding that the area can provide habitat to assist the recovery of the San Francisco lessingia, a special-status plant species.<sup>6</sup>

From a financial perspective, the commentors are correct that removal of housing and replacement elsewhere is not cost effective. Thus, this commitment points out that financial self-sufficiency is not and cannot be the Trust's only goal. Other goals include increasing the amount of open space, enhancing open spaces to provide critical habitat for native species, preserving historic buildings and landscapes, and making the park increasingly accessible to the public. With that said, the Trust cannot responsibly undertake the removal of housing until it is financially feasible to do so – in other words, until funds are available for demolition and habitat restoration, until the resulting revenue loss can be made up elsewhere, and until the costs of any replacement housing required have been accounted for. It is primarily for this reason that removal of Wherry Housing is projected to occur in phases over a 30-year period.

Trust Act requirements regarding development of a management program, which must include demolition of structures that cannot be cost-effectively rehabilitated, should not be viewed as prohibiting demolition in other instances. No legal constraints would preclude removal of housing when financially feasible.

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<sup>6</sup> Commentors are encouraged to consult the U.S. Fish and Wildlife Service's Draft Recovery Plan for Coastal Plants of the Northern San Francisco Peninsula, 2001 for a description of the plant species, its habitat, and the proposed recovery strategy. While the proposed recovery area is larger than Wherry Housing, and thus clearly anticipates that the species can be established elsewhere, Wherry Housing remains an optimal location for recovery of the species. The Trust is not in agreement regarding all aspects of the Draft Recovery Plan and has provided comments to the USFWS. These comments suggest bringing the timing of removal of Wherry Housing and restoration of native plant communities into conformance with the timing suggested in the Final Plan.

## HO-12. Wherry Housing

Views on the disposition of Wherry Housing vary widely, with many commentors supporting its removal in phases, but offering some suggestions regarding phasing, timing, and replacement. Some commentors suggest that all or a portion of Wherry Housing should be demolished in 2012 or 2013, with any remaining portions demolished in 2020, and the demolished areas restored as open space. The Sierra Club and others suggest "that the Trust proceed with the clear mandate to reduce housing at Wherry and MacArthur in stages, with one third removed by 2013 and the balance by 2020" or on a timetable consistent with the USFWS [Lessingia] Recovery Plan. NAPP and others suggest that Wherry Housing should be retained for as long as necessary to ensure the Presidio's financial self-sufficiency and to establish an appropriate reserve – but that once its usefulness has been exhausted, it should be removed and not be replaced. PAR and others suggest that Wherry Housing should be removed and the natural landscape restored at the earliest possible opportunity. ("...PAR believes that the Wherry structures should be removed in increments corresponding to the creation of any replacement housing on the Presidio, which would preferably be accomplished through the reconfiguration of existing buildings elsewhere on the Presidio... The removal should occur in reasonable increments, such as thirds, as soon as a corresponding number of reconfigured housing units becomes available for leasing. The demolition should not be delayed until some unspecified future time.")

Some commentors specifically address the objective of habitat restoration. ("We agree with the PTIP proposal to remove Wherry Housing. This will enable the recovery of the endangered Lessingia along with coastal scrub habitat.") These commentors often ask for a faster timeframe for removal and habitat restoration. ("Habitat restoration and subsequent adaptive management may take many years to bring reliable benefits to target species. We therefore recommend that the Trust suspend commitment to the 'one third/2030' schedule in the DEIS, and instead strive to complete demolition of Wherry Housing and restore coastal dune habitats of San Francisco lessingia at the earliest feasible date, in coordination with the National Park Service and the USFWS.") Some commentors suggest that to do otherwise would be harmful to the endangered species. ("The Wherry Housing complex is right in the

# RESPONSE TO COMMENTS

## 4. Responses to Comments

middle of suitable areas for restoration activities and has long been slated for removal and for restoration with dune vegetation. By extending the time frame for complete demolition to 2030, for strictly financial reasons, the Trust will stall endangered species recovery for decades. We strongly urge the Trust to reconsider this decision and commit to the complete demolition of Wherry Housing as early as possible.”)

It was pointed out that there are natural limits on annual capacity to restore dune habitats, requiring phased demolition and restoration, and thus that the original GMPA schedule of full removal by 2004 is unrealistic for biological as well as financial reasons. The suggestion is made that revenues generated at Wherry Housing should support ongoing restoration activities (and hence endangered species recovery) until 2012 or 2013, when, consistent with the No Action Alternative (GMPA 2000) and the commentor’s preference, the entire complex should be removed.

Some commentors are concerned that a timeframe longer than 10 or so years would inevitably end in delays, and remind the Trust that its mandate of financial self-sufficiency by 2013 does “not trump or overrule its affirmative obligation under the ESA to recover listed species. Phased demolition and interim leasing may help ease the apparent conflict, but not if the demolition is delayed for decades.” Another commentor writes “I ask that the Trust explain exactly why it is better to remove Wherry Housing earlier rather than later?” Some commentors, including the Neighborhood Association for Presidio Planning and the Cow Hollow Association, recommend that the Trust retain Wherry Housing as long as necessary to ensure the Presidio’s financial self-sufficiency. Others simply raise concern over lack of specificity regarding the timing of Wherry Housing’s removal, and suggested that an outside deadline (such as 2033) be set for its removal.

**Response HO-12** – Four different scenarios for removal of Wherry Housing are analyzed in the EIS. The No Action Alternative (GMPA 2000) would remove all of Wherry Housing between 2010 and 2012; the Final Plan Alternative and the Final Plan Variant would remove Wherry Housing in three phases, starting in 2012 and ending in 2030; the Resource Consolidation, Sustainable Community, and Cultural Destination Alternatives would remove Wherry Housing in two phases, starting in 2012 and ending in 2020, and the

Minimum Management Alternative would not remove Wherry Housing at all. The two-phased removal scenario is most consistent with the USFWS’ Draft Recovery Plan cited above, although that plan does not compel the Trust to adopt the two-phased scenario.

In all alternatives, removal of Wherry Housing could not be undertaken until financially feasible, and there is therefore a potential for delay. In other words, the housing cannot be removed until funds are available for demolition and habitat restoration, and until the resulting loss in rental income can be sustained without jeopardizing preservation and operation of the park. (The timing of removal in relationship to creation of replacement housing is addressed in Response HO-8, above.)

The ability of the Trust or any agency to physically restore habitat is another potential schedule determinant. Habitat restoration is labor intensive, and requires sufficient seeds and plant stock, as well as other landscape materials and equipment. Critical to the success of restoration efforts is the availability of limited genetically-appropriate propagules, staff, volunteer and funding resources necessary to plan, implement and maintain these efforts, as well as public support. An equally important consideration is the cumulative effect of these restoration activities, and ensuring that they do not significantly disrupt already fragmented wildlife corridors, nesting habitat for locally rare bird species, or increase competitive pressures for invasive non-native species that quickly colonize the newly opened and disturbed habitat. To date, both NPS and Trust staff have established annual thresholds limiting the amount of newly initiated projects that would expose habitat requiring restoration annually, based upon the above concerns and upon more than a decade of past restoration experience working both with the natural resources and the local community. The result has been the establishment of a balanced and iterative approach to the restoration of the Presidio’s ecological resources, based upon adaptive management, community participation, and strong resource education.

The capacity for habitat restoration is one important reason that the Final Plan proposes to adhere to the three-phased scenario for removal of Wherry Housing. Another reason is that the housing itself is an important community resource, and the Trust’s commitment both to sustainability and to providing a

# RESPONSE TO COMMENTS

## 4. Responses to Comments

diversity of housing supports the idea of phased removal over an extended period. Thus, while financial considerations are clearly a factor, the three-phased scenario is not included “for strictly financial reasons.” This scenario would also not “stall endangered species recovery for decades,” since the Plan’s phased implementation schedule would ensure that long-term recovery objectives are feasible and would therefore secure the long-term restoration of the lessingia.

### **HO-13. East/West Washington Housing**

Commentors provide a variety of perspectives regarding housing proposed for retention along East and West Washington Boulevards. Some suggest that open space in the South Hills district should be expanded by relocating, over time, the non-historic housing on West and East Washington Boulevard, asserting that the area’s biodiversity and its educational value can be enhanced if more land is restored, potentially as quail habitat. The Golden Gate Audubon Society, citing the Quail Restoration Plan, states “it is clear that the removal of East and West Washington housing and its restoration to Quail appropriate habitat would be very beneficial to Quail populations. Such removal and restoration would also go far in increasing the utility of these newly opened areas to other wildlife.”

It is pointed out that removal of all housing along Washington Boulevard would permit the creation of “a wide band of open space with high environmental, biological, and recreational value” and that Washington Boulevard is relatively inaccessible via car or transit so it “makes sense to relocate these dwellings over time.” It is also suggested that retaining and subdividing the large units in these areas would increase the residential population and subsequent environmental impacts.

Regarding West Washington, the California Native Plant Society notes that “Phased demolition of these buildings and restoration with native plant communities would add considerable value to restoration efforts on adjacent lands. Increasing the area of contiguous natural landscape is an important principle of conservation biology and would help the California quail that are regularly seen at that intersection. Restoring landscape vegetation to these areas following removal makes little sense. The areas should be restored to native vegetation if the buildings are removed.” CNPS offers more specific

observations regarding the East Washington area: “Previous investigations by the Trust or its partners have revealed that serpentine-derived soils occur under several acres now covered by landscaping and housing units. If there are opportunities to remove these housing units, then we strongly support the restoration of serpentine grassland habitat for *Presidio clarkia* and other rare species in that location.”

Other commentors assert that the Trust should retain East and West Washington Housing for subdivision/reconfiguration and reuse, and consider their demolition only in the long-term when financially viable, and “establish an east-west wildlife corridor as has been suggested by many naturalists.” Some state clearly that the Trust should not make the near-term removal of East and West Washington Housing a high priority, and the Trust does consider the removal of housing on Washington Boulevard. The following factors should be taken into consideration: (1) East Washington (built 1948) should be evaluated for its contribution to the National Historic Landmark District; (2) buildings should be removed only to restore native habitat or historic forest and to maintain trail access; (3) removal of West Washington should not trigger new construction; (4) priority should be given to removal that will allow restoration of important serpentine grassland habitat and forest zones; (5) the priority of restoration in this area should be evaluated against the desired priority of other restoration projects; and (6) traffic impacts of closing Washington Boulevard should be thoroughly evaluated.

**Response HO-13** – The fate of housing along East and West Washington is presented differently in various EIS alternatives, and thus all scenarios suggested by the commentors are analyzed. The No Action Alternative (GMPA 2000), Sustainable Community, and Minimum Management Alternatives would retain all of the existing housing units; the Final Plan Alternative and the Final Plan Variant would remove approximately 36 units (30 west of Battery Caufield Road, and 6 along Amatory Loop); and the Resource Consolidation and Cultural Destination Alternatives would remove all the existing units.

Under the Final Plan Alternative and the Final Plan Variant, large four-bedroom units remaining in these neighborhoods would be divided into smaller units, to accommodate more, smaller households. Some of the

# RESPONSE TO COMMENTS

## *4. Responses to Comments*

buildings were historically divided into two-bedroom units, and thus would be returned to their original configuration. This strategy, combined with the planned removal of Wherry Housing, would result in a substantial decrease in housing and in population in the South Hills planning district – from 587 housing units today, to 176 housing units in 2020 (Final Plan Variant) or 2030 (Final Plan Alternative). This reduction clearly belies the suggestion that subdivision would “increase the residential population and subsequent environmental impacts.”

The alternatives that propose removal of all or a portion of the East and West Washington neighborhoods would do so to expand open space, increase habitat, and increase habitat connectivity. In response to comments, maps provided in the Alternatives Section of the EIS have been modified to illustrate that the portion of West Washington that would be removed west of Battery Caulfield Road would be restored to support native plant communities. In this area, the topography and soils could support lessingia populations, and possibly quail habitat.

Where houses are proposed for removal in the East Washington area, landscaped vegetation would be the result, and could provide habitat for common plant and animal species, or could be used for recreational purposes. The proposals to restore native habitat, including serpentine grassland habitat where the soil substrate would support this plant community, or historic forest, are noted, and may inform future implementation decisions. Additional data collection and survey efforts would be required to help guide future long-term planning restoration priorities for serpentine communities and associated special status species recovery. The Trust will conduct studies in this region to better inform building demolition decision-making efforts. During 2001, the Trust and NPS worked in partnership with San Francisco State University to refine soils maps within the Inspiration Point area, and it is anticipated that future mapping efforts would be built on this partnership.

Where housing remains in the East and West Washington neighborhoods, the potential for removal could be further considered when the buildings near the end of their “useful life,” after the current planning horizon. As stated in the Final Plan, the Trust will pursue landscape treatments utilizing native plants, and take other steps to increase the scenic, recreational, and habitat values of

the neighborhood. The Trust will also study potential traffic controls along Washington Boulevard. In all instances, roadway or trail access will be maintained, and any major changes in circulation (e.g., permanent road closures) will be subject to environmental analysis and public input pursuant to NEPA.

The houses proposed for removal along East Washington Boulevard were previously analyzed to assess their historic and architectural significance, and to determine their eligibility for inclusion in the National Register of Historic Places and/or their consideration for “contributory” status in the NHL. Buildings 401 to 424 and Buildings 428, 432 and 434, known as East Washington Housing or Capehart Officer Family Housing, were constructed in 1948 and are listed as non-contributing resources in the 1993 NHL District Documentation.

Since 1993, two studies reassessed the East Washington Housing area and found it was not eligible for the National Register of Historic Places. The U.S. Army Environmental Center completed a comprehensive contextual study of these units in “For Want of a Home...” A Historic Context for Wherry and Capehart Military Family Housing. This study states “based upon the research conducted and evaluation of Wherry and Capehart housing in accordance with the National Register Criteria, it is recommended that these buildings are not eligible at a national level of significance, for the National Register of Historic Places... Using this historic context, an evaluation of local- or state-level significance may be conducted on a case-by-case basis in accordance with the National Register Criteria for Evaluation, however, it is believed that Wherry and Capehart housing will rarely meet this standard” (pages 96, 97). Furthermore, in 2001, all properties at the Presidio constructed after World War II were evaluated for historic significance as part of the Doyle Drive project. Steve Mikesell, acting as a consultant to Caltrans, evaluated the East Washington houses as part of this effort, looking at their potential significance in the context of the Cold War era. Neither the East Washington houses, or any other post-war structures at the Presidio were determined to have any significance for this time period. The Federal Highways Administration, the lead agency on the Doyle Drive project, has submitted this survey and evaluation report to the State Historic Preservation Officer for concurrence.

# RESPONSE TO COMMENTS

## 4. Responses to Comments

The above evaluations, completed by two separate agencies other than the Trust suggest there is no evidence for considering East Washington Housing or any other non-historic housing proposed for removal as historically or culturally significant.

### **HO-14. *MacArthur/Tennessee Hollow***

Several commentors voice support for demolition of non-historic housing along Quarry and McArthur Streets to permit restoration of the Tennessee Hollow stream corridor. “The demolition of MacArthur and buildings related to Tennessee Hollow restoration should be completed no later than 2020” to eliminate “the fragmentation of the biology” of the area. (“Non-historic housing should be removed for ecological restoration.”)

**Response HO-14** – All EIS alternatives except for the Minimum Management Alternative would include the demolition of non-historic housing along McArthur Avenue, as well as demolition of a few residential structures on Quarry and Morton streets. The Resource Consolidation Alternative would eliminate additional housing along Quarry Street while the Final Plan Variant would eliminate additional housing along Morton Street. All demolitions would facilitate restoration of the Tennessee Hollow riparian area, although no specific time frame is identified. As discussed in relation to Wherry Housing, above, removal of housing cannot be undertaken until financially feasible. In other words, the housing cannot be removed until funds are available for demolition and habitat restoration, and until the resulting loss in rental income can be sustained without jeopardizing preservation and operation of the park. The timing of removal in relationship to creation of replacement housing is addressed in Response HO-8, above.

### **HO-15. *Fort Scott***

One commentor suggests retaining non-historic housing at North Fort Scott, and sub-dividing those units to create a maximum number of low-cost rental units, sized to meet Presidio employee demand. The same commentor indicates that there is “no need” to use any of the buildings surrounding the Fort Scott parade ground for residential uses.

**Response HO-15** – As described in Response HO-9, above, the Trust acknowledges that subdividing existing units is often an efficient way to replace housing that is removed to expand open space or meet other Plan goals. The precise number of units that can be achieved in this way has not been determined, and only one preliminary study of a subset of Presidio buildings has been completed. This study looked at the potential for dividing units in ten buildings within North Fort Scott and concluded that they were highly suitable for subdivision. If this conclusion were to be borne out for all buildings in North Fort Scott after further physical investigation, and after calculating both the costs and the time required to amortize those costs based on expected rents, the existing 42 units could become 84 units.

The architecture and location of North Fort Scott also make it a possible site for demolition and reconstruction of housing. Existing units are within unattractive, non-historic buildings, disbursed along a winding roadway and cul-de-sac. The site is also accessible to transit connections at the Golden Gate Bridge plaza, yet visually secluded from the rest of the park. A preliminary analysis estimated that this site could accommodate 100 to 150 dwelling units if existing buildings were removed and replaced with buildings more compatible to their wooded setting and their presence within an NHLD. The analysis conducted by SMWM, the North Fort Scott Housing Capacity Study (January 2002), is incorporated here by reference and available in the Presidio Trust library for review.

Because further studies of this site and the economics of subdivision versus new construction are required, the Final Plan does not specify which strategy will be undertaken for increasing the density of housing at North Fort Scott. See the Housing map in Chapter Two of the Final Plan. Similarly, the Final Plan does not determine whether the 159 residential accommodations in the barracks that ring the parade ground at Fort Scott will remain as housing, or be converted to non-residential use. The ultimate use will be determined through further study, and as other uses are identified for Fort Scott. If an educational institution is found to occupy a portion of the buildings, it is possible that the barracks could provide student, faculty, or employee housing, or could provide more transient accommodations (i.e., lodging) as originally proposed in the 1994 GMPA and analyzed in the No Action Alternative (GMPA 2000).

# RESPONSE TO COMMENTS

## 4. Responses to Comments

### HO-16. *Housing Plan*

A number of commentors request more specificity regarding housing in the form of a building-specific, park-wide plan. (“The GMPA called for developing such a plan and the Trust has not shown why an overall housing plan would not be required.”) The CCSF Planning Department states “A Housing Management Plan should be included in the PTIP, and should be the focus of ongoing coordination with the City’s Planning Department and the Mayor’s Office of Housing.” Some commentors suggest that the Trust should make no decisions on construction and demolition prior to completion of the housing plan.

**Response HO-16** – It is unclear precisely why the GMPA EIS called for development of an “overall housing management plan” to “guide the housing program,” except as a way to allocate housing to NPS employees. That EIS also called for monitoring the “jobs-housing balance” over time, and considering “the conversion or adaptive rehabilitation of structures for residential use,” despite the apparent inconsistency of this strategy with NPS policy. As stated in the 1994 GMPA EIS (Responses to Comments, pages 73 and 121), “Park Service policies generally limit housing within park boundaries.” “Federal policy does not allow all Park Service employees to have access to park housing. It is allocated to required occupants such as public safety officers, maintenance workers, managers, and seasonal or temporary employees. Park housing is considered an additional benefit unavailable to other public servants, and therefore controlled for equity purposes.” Also “Presidio housing would be made available to any National Park Service employee based at the Presidio, following an allocation system outlined in the Housing Management Plan.”

In response to comments on the Draft Plan, the Final Plan has been modified to include further specificity with regard to housing. Chapter Two of the Final Plan indicates the number of residential accommodations (conventional dwelling units and barracks or dormitory units) in each planning district, the number proposed for removal and replacement, and the number proposed at the end of the planning horizon. In most cases, numbers which depend on future implementation decisions are presented as a range; in these cases, the final numbers will be determined as a result of further, area-specific and

building-specific investigations. Ranges are consistent with the Residential Program assumptions presented in Attachment B to Appendix J in the Draft EIS. This attachment has been updated and clarified in the Final EIS.

The Final Plan also places constraints on the maximum number of dwelling units in each planning district, the maximum Presidio-wide, and the maximum that would be achieved through new construction. Qualitative and procedural constraints would also apply to any new construction.

With these changes, the Final Plan provides sufficient policy direction regarding housing to obviate the need for further Presidio-wide planning on this issue. Those seeking a detailed assignment for individual buildings (e.g., for retention, demolition, or subdivision) can be assured that those decisions will be consistent with the Plan’s policies and will fall within the range of units (and therefore impacts) identified. Implementation decisions not specified in the Final Plan will be made in the future, following additional analysis of physical and fiscal considerations. Should potential impacts vary from those described in the EIS, or should new construction be proposed, additional analysis, public input, and agency consultation would be undertaken, consistent with NEPA and the NHPA.

The Presidio has historically been and remains a federal property distinct from the governance of the City and County of San Francisco, and one that has provided a substantial amount of workforce housing. Thus, while the Trust embraces the notion of communication and cordial relations with the City, no more formal relationship or oversight would be appropriate.

### HO-17. *Impact of Housing Decisions*

The CCSF Planning Department indicates that “it is not clear” how the “very aggressive jobs-housing balance goal” articulated in the Draft Plan will be achieved, particularly in light of the planned demolition of existing housing. The CCSF Planning Department asks what impacts demolition and replacement of housing will have on the affordability of housing, and on Trust expenses and income. They recommend that this analysis be presented in the EIS.

# RESPONSE TO COMMENTS

## 4. Responses to Comments

**Response HO-17** – The jobs-housing balance goal referred to is the suggestion that Presidio housing will be provided to accommodate 100 percent of the housing demand created by Presidio-based employees who want to live at the Presidio. This adjusted demand for housing is based on the understanding that many factors – not just the location of a job – determine where individuals choose to live. The Sedway Group’s Housing Demand Analysis cited earlier indicates that this demand could be accommodated within the existing number of units, or within the number proposed in the alternatives that call for replacement of all or most of the removed housing.

As described in Response HO-9 above, removal of housing and replacement within existing buildings will mean that the average unit size at the Presidio will decline, and in this sense, housing units may become more affordable. Conversely, when existing housing is removed and replaced with similar-sized units, that housing will be generally less affordable because the cost of demolition and replacement must be amortized, necessitating relatively higher rents. Also, newer units contain modern amenities and tend to command higher rents simply because they are more desirable. Nonetheless, the Trust has committed to maintaining a diversity of housing types and accommodating a diversity of residents. The Preferred Renter Program and other housing programs will be monitored over time and adjusted as necessary to achieve the desired diversity. Also see Responses HO-4 and HO-5 regarding affordability and who benefits from Presidio housing.

Potential impacts on Trust expenses and income are presented within Appendix K of the Final EIS.

### **HO-18. Incentives for Shared Housing**

Many commentors have suggestions regarding incentives that could be offered to encourage use of housing by Presidio-based employees. A couple suggest that the Trust provide a 10 to 20 percent discount for households with multiple Presidio employees to promote shared housing, thereby help to accommodate the demand for housing units, efficiently using existing housing, and reducing the need for new housing construction.

**Response HO-18** – Full-time Presidio employees already have first preference for housing and the recently revised Presidio Preferred Rental Program

provides average rent discounts of more than 30 percent for participating households. Moreover, the Preferred Rental Program makes sure that housing discounts are provided to people who need them the most (i.e., households whose earnings do not exceed the area median income). Employees could voluntarily double up to participate in the Preferred Rental Program and increase the number of Presidio-based employees, but whether or not one wants to change one’s household composition to achieve a social end is a personal choice.

See Responses HO-4 and HO-5 regarding affordability and who benefits from Presidio housing for discussion of other incentive suggestions, including financial subsidies and set-asides of affordable units.

### **HO-19. PHSB Questions and Suggestions**

The Sierra Club asks the Trust to clarify how the Draft Plan can take the 180 Public Health Service SRO units and allocate the square footage to residential (see Appendix J Land Use table) from the total group housing room of 540 and still have 410 SRO units (rather than the 360 balance) available in their model for group housing. They suggest that the Trust should adopt the Sierra Club’s proposal for how to configure SRO facilities. This would include 180 rooms at the historic portion of the Public Health Service Hospital for employee family residential use that would be converted into a lesser number of studio and one-bedroom units, estimated at over 100. It would also include removing all SRO units at the Fort Scott parade ground. These changes would eliminate 200 rooms from the SRO unit housing total.

**Response HO-19** –The PHSB is a non-residential building, and therefore does not contribute to the 538 group quarters described as part of the existing setting. While the Draft Plan assumed some portion of the PHSB building would be converted to residential use, the Final Plan has embraced this assumption as a specific “preference” in response to public comment. Thus, under the Final Plan, the PHSB would be rehabilitated for use as housing, and would provide an estimated 80 to 200 units. It has not been determined whether these units would be “SRO-type” units or conventionally dwelling units. This decision, and the actual number of units that could be provided, will take further site-specific analysis, including a detailed assessment of the historic building and rehabilitation requirements.

# RESPONSE TO COMMENTS

## 4. Responses to Comments

### **HO-20. *The No Action Alternative (GMPA 2000)***

The Sierra Club also suggests that the No Action Alternative (GMPA 2000) in the EIS distorts the 1994 GMPA with regard to housing, and should be corrected. Suggested revisions include the number of units possible through conversion of existing buildings, the overall number of single-family units, and the number of SRO-type units. According to the Sierra Club, the supply of single family units shown in the EIS for the GMPA 2000 alternative is understated, and the Trust should explain why the GMPA 2000 alternative shows 270 SRO units rather than the 540 SRO units presented in the 1994 GMPA. They further suggest the GMPA 2000 alternative should be adjusted to reflect the same conversion shown for the Draft Plan alternative, both for family units and dorms. Based on these revisions the GMPA 2000 alternative would include 560 family units from rehab, 80 units from conversion, 280 units from subdivisions, 0 units from new construction, and 410 single dorm units for a total of 1,320 units.

**Response HO-20** – Under the 1994 GMPA, the Presidio’s housing stock would be reduced substantially by 2010; the Presidio would contain 506 dwelling units with 1,613 residents, and 384 dormitory beds with 384 occupants (GMPA EIS, page 160). The total residential population would be about 2,000 (with additional units and dormitory beds made available as lodging for up to about 720 guests). The No Action Alternative (GMPA 2000) contains 510 dwelling units with 1,260 residents, and 260 dormitory units, with 400 occupants, or a total residential population of 1,660.

Thus, the main differences between the No Action Alternative (GMPA 2000) and the 1994 GMPA are: (1) the number of residents assumed per dwelling unit and (2) the use of dormitory units as a descriptor, rather than dormitory beds. The NPS used a population density of 3.2 residents per unit, the derivation of which is unclear from the text of the EIS, and the Trust analysis uses a density of 2.5 residents per unit, which was based on a review of residential leasing data prior to preparation of the Draft EIS. The NPS chose to count dormitory beds for their analysis. The Trust chose to count units, assuming that many dormitory units actually contain more than one bed, which is the way many group quarters are configured at the Presidio (for example, the units in Building 42).

Despite the unit counts presented in the 1994 GMPA, analyzed in the associated EIS, and explained here, the commentator suggests that the No Action Alternative (GMPA 2000) be modified to include more housing as a result of subdividing large units and converting non-residential space to residential use. This suggestion is apparently based on speculation about the outcome of a mitigation measure in the GMPA EIS requiring the NPS to monitor the jobs-housing balance and “consider” the “conversion or adaptive rehabilitation of structures for residential use” if “additional housing for park and park partner staff was required.” Though the suggestion is noted, and a variation on the Draft Plan Alternative that substantively complies with this request is provided in the Final EIS, the No Action Alternative (GMPA 2000) has not been amended. This is because the No Action Alternative (GMPA 2000) was designed – and then refined at the request of comments received in the scoping period – to deviate from the 1994 GMPA as little as possible in order to provide a meaningful “no action” scenario for comparison to other alternatives.

### **HO-21. *Leasing***

One commentator suggests that the Final Plan clearly spell out what protections residential tenants have, to reduce vacancy and turnover rates.

**Response HO-21** – The PTMP is a policy document, and beyond identifying overarching goals (e.g., accommodate housing demand associated with Presidio-based employees; maintain affordability; ensure a diversity of tenants), it does not delve into real estate management issues. The commentator may request information from the Trust’s residential management firm, John Stewart Company, including information regarding standard lease provisions, and information regarding the potential for leases extending beyond a one-year term.

### **HO-22. *Population & Employment***

Several commentators address the issues of population and employment, with one suggesting that the EIS include a Trust policy statement that defines the desired human population density for each of the seven planning districts. (“While much DEIS print has been invested to describe the attention required for endangered species, archaeological remains, and Tennessee Hollow

# RESPONSE TO COMMENTS

## 4. Responses to Comments

restoration objectives or building reuse objectives, I am less clear as to what the ultimate park density should ideally be for humans circulating and living in each planning district. How can the DEIS alternatives be fully evaluated without knowing how many humans the Presidio landscape could accommodate as visitors, employees, residents?") Another commentator suggests that the EIS make clear that the change in on-base residents from the 1990 Census to 2005 will essentially be zero and may actually decrease. Some commentators ask that the Trust "cap" employment and housing at modest levels, suggesting that this would be consistent with the Presidio's status as part of the National Park System and as an NHLD.

**Response HO-22** – The EIS addresses the issues of population and employment, providing an estimate of the number of park-wide residents, visitors, and employees under each alternative. Disaggregation of park-wide totals into the planning districts is inherent in the traffic assignments used to analyze potential transportation impacts, but is not reported in the body of the EIS or appendices because of its limited relevance to other aspects of the analysis.

The number of employees is provided in Table 1 in Appendix D of the Draft EIS, is used in the housing demand calculations, and is derived by dividing the square footage of each land use by its employee density (square feet per employee). The number of residents is provided in Table 42 (Draft EIS, page 303), and is derived by multiplying the number of units by a factor for average household size (2.5) and by the average number of residents per dorm unit (1.5). The number of visitors is provided within the text discussion of impacts on the visitor experience. Visitorship projections have been refined in the Final EIS as described in Response VE-1. These data are provided below, with comparison to 1990 Census data

### **Summary of Residents, Employees, and Visitors for All Alternatives**

Alternatives	Total Residents	Total Employees	Recreational Visitors (annually in millions)
1990 Census	4,700	5,550	(not applicable)
No Action Alternative (GMPA 2000)	1,660	6,460	5.2
Final Plan Alternative	3,770	6,890	7.2
Final Plan Variant	2,630	6,630	5.9
Resource Consolidation Alternative	2,230	8,480	7.0
Sustainable Community Alternative	3,330	7,520	8.2
Cultural Destination Alternative	3,990	7,840	7.2
Minimum Management Alternative	3,600	7,820	6.5
Sources: 1990 U.S. Census, The Presidio Trust, Sedway Group, Bay Area Economics, Wilbur Smith Associates, 2001 and 2002. All figures are rounded			

Assessing how much density any given area can accommodate is a difficult task, particularly because residents, employees, and visitors tend to use the park at different times, and the groups can overlap substantially (for example, if residents also work in the park, and also visit destinations such as Crissy Field or Inspiration Point). Nonetheless, the EIS analysis in its entirety essentially analyzes the potential impacts associated with a de facto "cap" on the number of residents and employees under each alternative. This "cap" is established by the amount of residential and non-residential space that would be available for leasing under each alternative, using reasonable factors to estimate employment densities and residents per household. In each case, the "cap" does not account for residents who may also be employees, and does not establish a firm limit on household size or employment density.

Regarding visitors, the Trust has committed to monitor visitor levels, establishing "carrying capacities" for managing visitor use if necessary. See Mitigation Measures CO-6 and CO-8 in the Final EIS.