

RESPONSE TO COMMENTS

4. Responses to Comments

4.20 PROGRAMS (PR)

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PROGRAM DELIVERY

PR-1. Rationale for Trust's Role in Program Delivery

Many commentors request that the Trust provide a clear, easily understood explanation of changes proposed in the Draft Plan's program delivery system and funding mechanism for park programs in so far as they differ from the GMPA concept. The NRDC letter notes that the only rationale that has been provided for this change is that it is based on experience and financial projections, hardly a clear rationale for the public to evaluate. Another commentor asks where the enabling legislation gives the Trust the authority to take on programming. Commentors are divided on whether the Trust acting as program provider would be an improvement over the GMPA. The California Native Plant Society characterizes the Trust as having "little call" to establish new programming. ("To do so risks diversion from its central competence, in a city and region overflowing with successful, competing program providers.") The Lake Street Residents Association questions whether it makes sense for the Trust to be program provider to the public. The Tides Foundation suggests that this would be a new role for the Trust, "not necessarily contemplated either legislatively or otherwise, for which it is poorly suited and inadequately staffed." One individual asserts that this "'top-down' process of programming, especially without any suggestion of how programming decisions will be made, is a recipe for disaster and embarrassment." The same individual wonders "what programming skills do the Board and staff of the Trust bring to the table, besides Mr. Heyman's work with the Smithsonian?" The NPS notes that "if the Trust relies only on agency generated programs and sources, the programs provided could lack the diversity envisioned in the GMPA." California Lawyers for the Arts notes that Trust programming would risk "homogeneity and conservatism in approach" and "to be vibrant, arts need to be experiential and arise from the community rather than being directed by a quasi-federal agency."

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Other commentors had a different perspective. One of these commentors registers its “wholehearted support” for Trust programming because “it very ably balances the many interests of all segments of Bay Area society.” The Fort Point and Presidio Historical Association states that the Trust’s commitment to “providing high-quality, accessible historical and other cultural programs is a significant improvement over the GMPA.” San Francisco Beautiful believes that the Trust “as the manager and director of program quality and implementation is the appropriate body to meet the overall program goals.” (“Quality is especially important in a national park with millions of national and international visitors.”) The advantages of program consistency and coordination “make sense” to the CCSF Planning Department; however, it notes that “if an emphasis on ‘the bottom line’ is to become increasingly prevalent, then the Trust must compensate by selecting programs that are economically and socially diverse.” SPUR commends the Trust “for taking the lead on this, rather than relying on its tenants for programming consistency and quality.” Other groups, such as the Cow Hollow Association, concur that some augmentation of park programming is necessary; however, this should be “commensurate with the Presidio’s national charter and the vision of the GMPA...”

Response PR-1 – The 1994 GMPA assumed that tenants would be chosen in conformance to four programmatic themes: stewardship and sustainability, cross-cultural and international cooperation, community service and restoration, and health and scientific discovery. These themes supported an overarching vision of the park as a “global center dedicated to addressing the world’s most critical environmental, social, and cultural challenges.” Under this scenario, tenants would be a source of public programming as well as a source of revenue for the park. This approach is assumed as part of the No Action Alternative (GMPA 2000) analyzed in the PTMP EIS.

In contrast to this approach, the Draft Plan, as well as the Final Plan, provides that not every Presidio tenant would be required to have a mission that serves a specific program theme. The Final Plan Alternative does not preclude the possibility of tenants providing programs that are related to the park, as well as programs that are specific to their own purpose. However, park tenants would not be the sole provider of Presidio programs.

The Trust proposes, in the Final Plan, to be more responsive to the market in its selection of tenants than the GMPA assumed. The Final Plan allows the pool of potential tenants to remain wide, and does not restrict tenants to the GMPA’s four program themes. The Plan, therefore, puts less emphasis on who occupies buildings, and more on the preservation of park resources to ensure that visitors have an exceptional experience. This approach, expressed in the Final Plan, could allow greater tenant diversity than envisioned in the GMPA.

Under the PTMP, the Trust will not choose tenants principally for their programmatic capacity. Rather, the Final Plan states that tenants would be selected on the basis of the following criteria: (1) demonstrated ability to enhance the Presidio’s financial viability and/or to rehabilitate and reuse an historic building; (2) responsiveness to the General Objectives of the GMPA and contribution to the visitor experience; and (3) compatibility with the Final Plan’s planning principles and preferred uses.

In response to comments, the Final Plan provides that the Trust and the NPS will be the primary coordinators and providers of programs offered at the Presidio so that programs will be consistent year after year, dynamic and diverse, responsive to the interests of the broad public, and specific to the Presidio. The Final Plan has been modified to better articulate the Trust’s goals of collaborating with the NPS and “seeking other partners that can bring the capacity and expertise needed to provide a consistently high standard of programming suitable to a national park in an urban setting.” See Chapter One of the Final Plan.

With regard to program delivery and the shift from the GMPA’s concept of relying on tenants to be the primary means of providing programs, there are several factors the Trust considered as part of this planning process. Primarily, this change from the GMPA is proposed in order to ensure that a consistent and well-coordinated set of programs is provided for the public even as tenants may change over time. The Trust acknowledges that tenants have missions and priorities that change, and that tenants themselves will come and go from the Presidio, which means that their programs will come and go as well if tied to their occupancy at the Presidio. In addition, if tenants are asked to provide and expend the capital funds needed for park rehabilitation and

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improvements, requiring them to incur the additional financial burden of providing park programs potentially creates a disincentive to lease space within the Presidio. An additional enforced programming requirement becomes effectively a “cost of doing business” for the tenant and could therefore effectively become a form of rent offset. Furthermore, if the Trust were to include lease provisions requiring all tenants to provide park programs, the oversight responsibility of the Trust to ensure that all tenants delivered programs that are appropriate to the Presidio would be overly burdensome. (Refer also to Responses TS-1 through TS-4.)

The Trust Act mandates that the NPS, in cooperation with the Trust, be responsible for providing public interpretive services, visitor orientation, and educational programs. The Trust is committed to working with the NPS and other partners to provide a meaningful park experience for all visitors. The Trust Act also states that “The Trust may participate in the development of programs and activities at the properties transferred to the Trust” (Section 104(b)), and instructs the Trust to manage the property in accordance with the purposes of the 1972 GGNRA Act, which emphasizes “public use and enjoyment,” and “recreation and educational opportunities.” The Final Plan states that the provision of diverse programs that preserve and protect the park’s resources, and that interpret and celebrate its history, can help bring people and the park together. It is anticipated that tenants, as well as other partners, can play an important role in providing an array of programs, but tenants will not be the sole provider of programs under the PTMP.

Some commentors support the concept that the Trust should be the primary provider of programs to ensure that park programs are commensurate with the park’s national character, its rich history, and its diverse natural resources. Others assume that the Trust, because it is a federal agency, runs the risk of “homogeneity and conservatism” in this role. However, the PTMP articulates the Trust’s commitment to providing a diverse array of dynamic programs that demonstrate both why and how the park is being preserved and its resources protected. The Plan states the Trust’s commitment to work with the NPS and others to achieve that end. In response to those commentors concerned about the Trust’s lack of staff or expertise in programming, the Final Plan further acknowledges that seeking out and developing partnerships will be important to enhance current programs and to develop new ones.

In response to those critics who oppose the Trust being the coordinator of Presidio programs, the Trust believes that the public programs component of the Trust’s work can build long-term support for the park, can encourage active participation in caring for the park, and can enhance appreciation and enjoyment of the park’s history and many resources. The Trust has worked in partnership with the NPS, the GGNPA, and other organizations to establish and maintain programs that engage volunteers, subject-matter experts, and park visitors in a range of activities, from sustainability and habitat restoration to historic preservation and archaeology. The Trust has worked with tenants and the NPS to interpret historic buildings, and to develop interpretive waysides and informational kiosks. The Trust will continue these activities and will explore additional ways to make the park as accessible as possible and to make the visitor experience compelling.

Some suggested that the city surrounding the Presidio is “overflowing” with program providers and that the Trust should not, therefore, provide cultural programs. The Trust recognizes that its resources are limited and that its program priorities need to be commensurate with its core mission. This has been clarified in the Final Plan, and the financial contribution to programming has been reduced. The Trust’s own programming efforts, including cultural uses as explained in the Final Plan (see Chapter Two), will be directly related to the park. The Trust will work with the NPS to determine what some of these efforts should be. However, the Trust will ultimately be the decision-making body for Presidio programs in Area B, with public input, and will determine which programs the Trust itself has the capacity, expertise, and jurisdiction to provide. See Chapter Four of the Final Plan for a discussion of public involvement in implementation activities.

PR-2. Tenants’ Role in Program Delivery

Various commentors believe that programs should be delivered through tenants rather than by the Trust. The NPS notes that “provision of programs through a variety of sources would allow the possibility of significant visitor interaction with tenants, introduction of a broad range of activities and viewpoints, an increase in visitor access to historic structures, and the expression of the concept of a ‘global center’....” One individual is unsure of how the “guiding themes of ‘park to the people’ and ‘swords into plowshares’

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fit in” and “how tenants fit with these concepts?” Others see a smaller tenants’ role in programming as an ineffective way either to build the Presidio community or to integrate it into the larger community. (“If the Presidio community members feel they are simply tenants, without a sense of responsibility to the Presidio’s growth as a community, then I feel there will be great difficulty persuading the rest of San Francisco of the vibrancy of the ‘new Presidio.’”) The CCSF Planning Department believes that if the tenant’s role is limited to substantial lease payments or other revenue generation, it could threaten an economically and socially diverse tenant mix and program diversity.

Response PR-2 – With regard to comments recommending that programs be delivered by tenants rather than the Trust, see Responses PR-1, TS-1 and TS-2. The Final Plan states that the Trust, in cooperation with the NPS, will seek out program partners that may include organizations that occupy building space at the Presidio or those who may be interested in sponsoring or supporting Presidio programs in other ways. The Trust agrees with the comment by the NPS that provision of programs should be through a variety of sources that provide a broad range of activities and viewpoints. This concept has been strengthened in the Final Plan. See Chapter One, “Bringing People to the Park” section, of the Final Plan.

The Trust is also committed to fostering appropriate programs and activities to widen the community of Presidio stakeholders, including tenants and other park partners. Please refer to Planning Principle 13 of the Final Plan. As stated there, “the Presidio will become a vibrant community that will welcome the contributions of educators, environmentalists, leaders in technology, scientists, government agencies, private businesses, cultural institutions, non-profit organizations, and interested individuals.” Some tenants will provide programs and visitor amenities, such as food and lodging; some will provide programs that are tied to their own mission.

Lastly, with regard to concerns expressed by the CCSF over tenant diversity and tenant selection, refer to Chapter Four, “Park Programs and Tenants” section, of the Final Plan. Tenant diversity is embraced because the Trust recognizes that a diverse tenancy will re-establish a vibrant community in the Presidio and is crucial to the preservation of the park and its many historic

buildings. While the Trust will seek tenants that can help fund the preservation and enhancement of the Presidio’s resources, those tenants will include those who can help to meet the community service needs of the park’s visitors, tenants, and residents. Furthermore, the variety of building space available at the Presidio, most of which is historic, small-scale, and not competitive with “Class A” downtown office space, will help to ensure tenant and building use diversity. As explained in Chapter Two of the Final Plan, the Trust will balance office uses, with public uses of buildings, which would include cultural/educational uses and visitor amenities.

PR-3. Role of Others in Program Delivery

Many commentors believe that the Trust should pursue programming within the Presidio in strong partnership with the NPS and with tenants and other organizations. This is stated in a variety of ways, all of which emphasize collaboration. The NPS supports a “collaborative approach,” emphasizing partnerships and the contributions of park tenants as an integral part of developing the program spectrum. The GGNRA Citizens’ Advisory Commission agrees that programming should be a “collaborative effort” among the Trust, the NPS, and the public. (“We urge that the effort begin as soon as possible and include the broadest possible array of professional and institutional, governmental and civic organizations with an interest in the themes outlined in the PTIP.”) The GGNPA wishes to explore various potential avenues for collaboration in both public programs and facility needs, including “linkages to the Presidio Trust programs and those of other Presidio partners, common marketing, use of other Presidio facilities for special program needs, and the potential use of transportation shuttles for outreach purposes.” The Presidio Tenants Council seeks “a forum for collaboration,” while Swords to Plowshares sees a “collaborative partnership” to “create dynamic and accessible programs that can draw a diverse public.” The Exploratorium recommends that programming take maximum advantage of the resources available from regional, national and local institutions and organizations, as well as tenant organizations. (“Many institutions and organizations have long histories and excellent records of success with existing programs and development of new programs that would be appropriate at the Presidio. In addition, the Trust will not have to develop or divert the resources, financial or otherwise, to be able to develop meaningful

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programs, visitor experiences and regional, national and global outreach, that the Trust be encouraged to partner with capable institutions and organizations...”) Finally, one of the speakers at a public hearing representing the Presidio Performing Arts Foundation finds it essential that the Trust develop, coordinate, and oversee cultural programming with partners both inside and outside the park.

Response PR-3 – The Final Plan states the Trust’s commitment to collaboration with the NPS, the GGNPA, and other organizations for interpretation of the Presidio’s stories and delivery of programs. Refer to Planning Principles 11, 12, and 13 in the Final Plan for this discussion; included in this text is a description of current programs, including partnership activities with the NPS, GGNPA, and others. The Trust agrees with commentors who state that collaboration among different groups, both local and national, keeps programming dynamic by bringing together different perspectives and different resources. The Trust agrees that collaboration and outreach will also be important to help the Trust leverage resources needed to provide a spectrum of expertise as well as a wider audience.

Examples of current program collaborations at the Presidio that would continue or be supplemented include veterans organizations’ work with the Trust to produce a Memorial Day event that draws thousands; local and national non-profit organizations’ work with the Trust to sponsor runs and other activities to raise monies and awareness about social issues; the Trust-sponsored Moraga series, which brings subject-matter experts to the Presidio and provides a venue for local performers; the Trust’s sustainability, recycling, and composting programs that are part of the park’s daily operation and maintenance and are helping to establish the park as a model for urban conservation; volunteer programs that contribute to the restoration and protection of the park’s natural resources and encourage ongoing stewardship; and school groups that come and explore the Presidio with the help of NPS rangers, Trust staff, or on their own.

The Trust recognizes the value of and is participating in joint efforts to optimize the use of alternative modes of transportation to provide greater access to Presidio facilities and establish connections among the various programs provided by the Trust, the NPS, tenant organizations, and others.

Refer to Planning Principle 14 of the Final Plan in regard to improving access for visitors to program activities.

PR-4. Role of NPS in Program Delivery

Some commentors, such as the Pacific Heights Residents Association, argue that the NPS rather than the Trust should take the lead on programming, and refer to the Trust Act (Section 102(b)) to support their position. Others, such as the CCSF, would like to see the NPS role in programming made more clear.

Response PR-4 – The Final Plan (like the Draft Plan) articulates the Trust Act’s direction regarding the role of NPS in interpretation. The Act states that the NPS, “in cooperation with the Presidio Trust, shall be responsible for providing public interpretive services, visitor orientation, and educational programs” for the Presidio. The two agencies work cooperatively on interpretation and other programs and are currently preparing an interpretive strategy for the Presidio that will guide interpretive programming into the future. This document will lay the foundation for an effective partnership among the Trust, the NPS, and others and suggest future interpretive program improvements or expansions. Refer to Planning Principle 11 of the Final Plan. See also Responses PR-1 and PR-3.

Section 102(b) of the Trust Act defines a cooperative arrangement, not a hierarchy, for the Trust’s work with the NPS. This Trust Act provision should be read as creating a “floor,” not a “ceiling,” for the Trust’s program work. In other words, in addition to the interpretive and other visitor-oriented services that NPS will provide in cooperation with the Trust, the Trust may offer additional visitor-oriented programs. See Presidio Trust Act, Section 104(b). The NPS has both limited staff and limited financial resources available to dedicate to Presidio programs. Coordination with the NPS is focused on those areas where both NPS expertise and available resources can be optimized. The cooperative efforts of the two agencies will seek to enhance the quality and breadth of public programming, to leverage resources of both agencies, and to avoid duplication of effort. This does not preclude the possibility that each agency may undertake some programming independently (as the Trust did, for example, with its Moraga lecture series).

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SCALE OF PROGRAMS

PR-5. Effect of Increased Program Levels on Development

A number of commentors, including the NPS, are concerned that an increased level of programs would influence the level of new construction and demolition in the quest for increased revenues, and cite the text of the Draft Plan (“program quality and quantity would depend upon the Trust’s ability to generate lease revenue”) to support their position. The NPS concurs that programs are an important element of the effort to bring the Presidio alive; however, they maintain that the addition of new construction to meet these needs should be carefully weighed against the preservation of the important natural and cultural resources within the park. (“The Presidio Trust’s proposal to allocate up to \$10 million of its own funding for programming does not appear essential to its mandate. Yet this proposal requires corresponding leases and development to generate \$10 million annually in net income.”) NAPP warns that the “robust programming presented in the plan may be driving an excessive and inappropriate amount of real estate development to achieve the dollars needed to support such a goal.” Another neighborhood organization, the Telegraph Hill Dwellers, tells the Trust that “you want to build buildings and other facilities that you shouldn’t build in order to generate revenues to finance the sponsorship of activities that you shouldn’t sponsor. We don’t want you to try to ‘make a difference’ in our lives; we just want you to preserve and enhance the Presidio as a glorious national park.” Others contend that by selecting more tenant organizations with missions relevant to the national park mission, the tenants could provide appropriate programs at less cost and reduce the need for the Trust to overdevelop in order to pay for “aggressive program plans.”

Response PR-5 – The level of programming proposed in the Final Plan is not the basis for the proposed levels of demolition or new construction under this alternative. Other planning and policy goals, such as increasing open space and providing sufficient housing for Presidio employees, influenced the Plan’s proposals related to demolition and new construction. Developing and delivering a robust set of programs is not directly related to new construction. The Final Plan clarifies these points. Although the Final Plan recognizes the potential for some new construction and provides more specific information in

the way of examples, allowing for the possibility of new construction is not motivated by the need to generate revenue that would then support programs. Rather, new construction will be used as a tool through the course of implementation to allow the feasible and cost-effective rehabilitation and reuse of historic buildings, and in some cases to achieve other Plan objectives. See Response NC-1. New construction would also be subject to additional planning, analysis, and public involvement prior to implementation.

The Presidio is a place for the public, and the Trust makes a commitment in the Final Plan to preserve and protect the park’s valuable resources and to make the park as accessible as possible to the many, not the few. The Presidio’s cultural, natural, scenic, and recreational resources will be the cornerstone for Presidio programming. Diverse and dynamic programming, including the provision of visitor amenities, special events, and stewardship programs, is an effective way of creating access and strengthening this commitment to the park.

In response to public comment and concerns that the Trust had set its park programming goals too high, the Trust has modified the Final Plan to reduce the Draft Plan’s assumption of \$10 million annual expense for programs to a more modest goal of \$5 million annually. In Fiscal Year 2001, the level of expenditure for park programs was approximately \$2 million, and the Trust hopes to increase this amount gradually over time to \$5 million and to seek philanthropic funding to supplement Trust resources. In addition, the Trust will leverage activities undertaken by park tenants and supporting partners who can provide programs and services to park visitors; feasibility studies will also be conducted to explore funding options as part of program implementation. Refer also to Response PR-19.

The Final Plan, in Chapter Four, “Park Programs and Tenants” section, explains that the level and nature of future programs will be influenced by three factors: (1) the ability of the Trust to generate funds to pay for a program’s operating and capital costs, (2) the effectiveness of collaborative efforts between the Trust and the NPS, and (3) the ability of the two agencies to engage partners. However, the Trust’s highest priority for funding, particularly over the next several years, will be the protection and preservation of the Presidio’s valuable resources.

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PR-6. Effect of Increased Program Levels on Visitation

Various commentors, including several neighborhood organizations and the Sierra Club, raise concerns that increased programming would draw too many visitors, and associated traffic and congestion, to the park. The Lake Street Residents Association “question the wisdom of providing programs that already exist elsewhere. Drawing huge numbers of additional visitors to the Presidio as a destination seems incongruous with its status as a national park. A focus on the Presidio as a destination for the exchange of far-reaching ideas can establish the Presidio as a preeminent forum without having to draw throngs of daily visitors. We hope that big does not win out over aesthetics.” PAR recommends that the Plan be revised to specify that there should be a mix of tenant-and Trust-sponsored programs appropriate in content and size for the Presidio. (“If devoted primarily to museums, 930,000 square feet could provide space for several large museums, which could negatively impact traffic, visitor experience and the setting.”)

Response PR-6 – The Presidio is first and foremost a park in an urban setting, and it is part of the GGNRA; as such, it is a destination for the public, far and wide. The alternatives analyzed in the EIS evaluated varying amounts of building square footage and levels of public programming that would potentially draw visitors. In proposing the Final Plan Alternative as its preferred plan, the Trust has carefully considered the potential effects on visitor levels, traffic congestion, and the aesthetic character of the park. The projected number of visitors under the Final Plan Alternative is lower than the number of park visitors estimated under the 1994 GMPA, a plan that many commentors find acceptable or preferred. See Response VE-1. The projected number of visitors under the Final Plan Alternative is also lower than the numbers projected for both the Sustainable Community and Cultural Destination Alternatives. The Trust’s Final Plan offers public accessibility and programs without drawing the “throngs” that other alternatives might have fostered.

For clarification, neither the Draft Plan nor the Final Plan anticipated that 930,000 square feet of building space would be dedicated to museum uses. To clarify this, the EIS and Plan have been modified to provide definitions for cultural and educational uses; see Section 4.4.1, Land Use, of the Final EIS

and Chapter Two of the Final Plan. The building square footages for these two uses have been disaggregated. Refer to Response PR-9 for clarification of the anticipated extent and location of museum use under the Final Plan Alternative.

With respect to the impacts of the 530,000 square feet of cultural uses in the Final Plan Alternative, these potential environmental effects have been fully analyzed in the Final EIS. Refer to Section 4.5 of the Final EIS for full discussion of transportation and circulation effects, and Section 3.4.4 for a complete discussion of effects on the visitor experience.

PR-7. Reserving Building Space for Program Partnerships

Several arts organizations ask the Trust to delineate buildings to be used for arts, cultural, and institutional uses and ensure that higher-rent-paying uses do not displace these uses. Some commentors, such as the Sierra Club, although they champion adoption of the GMPA, do not agree that some tenants should be subsidized. The Sierra Club comments that no tenants should be accepted that would pose a continuing operating subsidy or other financial demand on the Trust. Others believe financially stable tenants should help underwrite the needs of desirable, but possibly under-funded tenants. One individual remarks “having some tenants pay market rate, while non-profits pay a reduced rate is working, and no further fees should be placed on market rate paying tenants.”

Response PR-7 – Neither the Draft Plan nor the Final Plan provides building-specific information as requested by the commentor. Rather, given the programmatic nature of the PTMP, the Final Plan generally provides square footages Presidio-wide (Area B) by use category and states use preferences for each planning district. There are some limited exceptions, such as the Final Plan’s identification of the Commissary building as a preferred location for a museum use. Figure 2.2 of the Final Plan illustrates the Trust’s preferred areas for cultural and educational uses, with square footages for affected planning districts. Existing cultural and educational uses (such as the Officers’ Club and the chapel), which constitute approximately 100,000 square feet of building space, are identified, as is the Commissary (another 100,000 square feet), leaving the location of about 330,000 square feet of cultural program space to be determined.

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The specific buildings dedicated to public-oriented use will be determined over time and will be determined largely by what the economics of building use can support as well as the opportunities that are presented. The Presidio does not offer one kind of space and there is no one market for space in the Presidio. Much of the space is appropriate for the kind of social or cultural programmatic uses commentors describe, and the Trust will issue RFPs for tenants that can make appropriate use of specific kinds of space, i.e., that represent the Plan's "preferred uses." The Final Plan envisions one-third of the building space for public uses (cultural, educational, visitor, or community uses). The Trust will actively seek tenants who can contribute to the liveliness of the park either through programs that are directly related to the park's resources or through programs that add a further cultural and/or social dimension.

With regard to comments against tenant subsidies, the financial analysis conducted as part of this planning effort makes rental assumptions for cultural/educational space that are commensurate with an average market rate for such uses. See Responses FI-4 and FI-5.

PR-8. New Construction to Meet Park Program Needs

Several commentors, including various historic preservation groups, maintain that the Trust should not introduce new construction to meet park program needs. The NPS states "the consideration of cultural programs is an important element of the effort to bring the Presidio alive, however, the addition of new construction to meet these needs should be carefully weighed against the preservation of the important resources of the Presidio, both natural and cultural." The Fort Point and Presidio Historical Association suggests that "funding for first-rate historical museums and interpretive programs does not necessarily require significant new construction" and the California Heritage Council advises the Trust that "you should use existing buildings not new construction for these programs." One individual quips: "'If you build it...they will come' is a myth that only works in the movies." Others see new construction as beneficial and are specific in their ideas. For example, one individual hopes to see a mid-size convention center at the location of the current parking lot between Montgomery and Anza Streets "to generate a steady flow of income and actually improve the appearance of the Presidio."

Response PR-8 – The Trust has provided clarifications regarding the intended use of new construction in the park in part to allay the fears of commentors that program and museum uses will drive large-scale new construction. Commentors misunderstand the intention behind the proposed levels of new construction in the Draft Plan Alternative; the Final Plan Alternative has been clarified in response to these and other comments. The Plan does not propose new construction to provide additional large-scale buildings as venues to host programs, but rather emphasizes rehabilitation and reuse of existing buildings for preferred uses, including program-related uses. While allowing new construction to provide a cultural or educational venue is not precluded, the Final Plan clarifies that non-residential new construction will be primarily used to facilitate rehabilitation of historic buildings by providing building additions or annexes. One such example is the Presidio Theatre, where some amount of new construction, in the form of a building addition, will likely be required to return the building to active use. See Responses PR-5 and NC-1. The Final Plan does not propose any "convention center" uses as one commentor suggests. The Final Plan allows for some small-scale conference-type uses in venues such as the existing Golden Gate Club, and the potential for additional conference spaces in the Fort Scott, Main Post, and Crissy Field planning districts.

In response to comments that suggest museum use will drive the need for new construction, the Trust does not agree that this is the case. The Trust believes that museums are appropriate in a park and they can be used to tell the Presidio's rich interpretive stories. The NPS Visitor Center (Area A) at the Main Post is one such facility. The Plan looks to the reuse of a number of currently existing facilities to accommodate museum uses. Specifically, the Plan identifies the existing Commissary as an appropriate structure for reuse as a museum, and Congress has authorized a feasibility study for the building's potential use as a Pacific Coast Immigration Museum. Building 640 is also the subject of a feasibility study for reuse as a museum and interpretive center in partnership with the National Japanese American Historical Society. Museums are expensive to establish and operate, and these proposals would require outside sources of funding. These studies will continue after the completion of the PTMP planning process and will include opportunities for public input.

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PR-9. Clarifying Amount of Space for Cultural Institutions

A number of commentors request that the Trust clarify the amount and type of space that would be devoted to cultural institutions providing programs for park visitors. The Fort Point and Presidio Historical Association believes that such clarification would help allay fears and garner public support for these programs. (One individual considers the scale of proposed program concepts as “grandiose,” points to the 930,000 square feet of building space for “cultural/educational” use in the PTIP, and exclaims “that’s roughly twice the square footage of the Transamerica Pyramid!”). PAR finds it difficult to assess fully the implications of the proposed ‘cultural/educational’ square footage because the Trust has not broken down separate categories for cultural (museums) and educational (schools) use. They and others request that the Plan be revised to separate cultural from educational uses, identifying separately the square footage for such “educational” uses as schools, conference centers and meeting rooms.

Response PR-9 – In response to comments, the Plan and the alternatives in the EIS have been clarified by providing a breakdown of square footage for cultural and educational uses. Furthermore, definitions of these use categories have been included in both the Final Plan and the Final EIS. Cultural uses could include interpretive sites, exhibit space, performing arts venues, community facilities, artist studios and more. Educational uses may include formal curriculum-based programs for children or adults, as well as less formal programs, workshops, or tutorials. Other educational uses may include “think tanks” or research institutions. Both public and private organizations would be considered, and priority would be given to tenants who use the Presidio as an educational tool (e.g., as an “outdoor classroom”), who offer services to park visitors, or whose constituencies are national in reach. Figure 2.2, Cultural and Educational Uses, in the Final Plan illustrates the Trust’s intent for preferred locations and square footages for these uses.

In the Final Plan, the total amount of square footage for cultural/educational uses has been reduced from 930,000 to 920,000 square feet. Of this amount, cultural uses (which include interpretive sites, museums, artist studios, performing arts venues, and more) are preferred for approximately 530,000 square feet, principally at the Main Post and Crissy Field (Area B).

Educational uses are preferred in approximately 390,000 square feet, largely at the Public Health Service Hospital and Fort Scott planning districts.

Approximately 100,000 square feet of building space in Area B already hosts cultural uses. See Chapter Two of the Final Plan. The Final Plan also states that the Commissary (approximately 100,000 square feet) would be the preferred location for a museum, should an appropriate program be proposed and prove to be financially feasible. As indicated in the GMPA, the hangars at the west end of Crissy Field are another possible location for a museum.

PROGRAM CONTENT

PR-10. Definition of “Cultural and Educational Uses”

Commentors wish to see a clear definition of “cultural and educational uses” to analyze and evaluate the impacts of the Plan. Various commentors ask the Trust to identify the types of programs it envisions for “smaller museums,” “major museums,” “enhanced interpretation,” and “travelling exhibitions and programs,” and the anticipated funding levels of each type of program. One individual fears that no rationale or maximum number given for the number and size of new museums is a “grotesque loophole and could lead to placing a museum in a building like the PX at Crissy Field.” A Presidio tenant would like to see language describing “culture” at the Presidio broadened to specifically refer to the arts, history, scientific inquiry, and the life of the mind. (“In particular, the concept of culture should be extended beyond the notion of “military history and culture” or the activities that have a clear precedent in the life of the military communities that occupied the Presidio.”)

Response PR-10 – The Final Plan has been modified in response to comments to provide more definition for the terms “cultural programs” and “cultural uses.” See Responses PR-9. Cultural uses could include venues for interpretation, exhibit space, performing arts, community meetings, art studios, or other appropriate uses. The exact nature and content of cultural program uses is not presently known and therefore cannot be prescribed with specificity in the Final Plan. As with other uses and tenants at the Presidio, the exact nature of cultural or educational programs depends upon the availability of interested program tenants, the Trust’s ability to foster and enter into program partnerships, and market and outside funding factors that simply are

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not known. The Plan creates a policy framework supportive of uses that are accessible to the public, and identifies preferred locations for cultural uses if they can be found, but until specific program users or partners make specific program proposals, the Trust cannot be more specific about the exact nature or identity of the programs or program users.

With respect to funding levels for specific programs, other than the general funding goals discussed in Responses PR-19 through PR-22, the Trust has not established more specific budgets or funding levels for specific types of programs.

Museum uses have been clarified and better defined in the Final Plan. See Response PR-8. The Plan also includes examples of existing programs. See Chapters One and Two of the Final Plan.

PR-11. *Duplication of Programs in San Francisco*

Commentors urge the Trust to avoid duplicating and competing with capable institutions and organizations in the San Francisco area. The Cow Hollow Association recommends that programs be designed with public input and avoid duplicating and competing with existing resources in the San Francisco area. This recommendation is supported by the California Native Plant Society, which asserts that “devoting scarce Trust financial resources to creating curatorial infrastructure makes little sense in San Francisco where there are much stronger and larger cultural institutions whose missions are more directly focused on such matters.” (“Such exhibits properly belong at the DeYoung, Legion of Honor, or the Asian Art Museum, not at the Presidio. The Presidio should not be competing with established Bay Area institutions, but rather maximizing public awareness of its own unique attributes.”)

Response PR-11 – In response to public comments, the Final Plan provides some parameters for the kinds of programs that would be considered for the Presidio. See Planning Principles 11 through 14 and Chapter Two, “Public Use” section, of the Final Plan. The Trust does not agree that the San Francisco Bay Area has a limited capacity for cultural programs, but recognizes that its own capacity for providing programs is limited. For this reason, the Final Plan articulates the importance of partners with expertise in delivering programs. The Trust agrees with the commentors that public input

will be important to keeping programs vital, and will therefore find effective ways for the public to provide input. Annual public workshops such as those undertaken for the Vegetation Management Plan (VMP) are one possibility.

The Final Plan states that programs for park visitors will be provided through the collaborative efforts and resources of the Trust, NPS, park tenants, and other program partners. Tenants will also bring programs to the park that might not serve park program objectives, but would nonetheless contribute to the liveliness of the Presidio. The Trust also hopes to maintain and expand natural resource and sustainability programs, as well as the commemorative events and festivals that currently take place, and hopes to add new events, such as the Main Post Open House and the Open Park Day held in Spring 2002, to promote more of the park and allow the public to explore its history and natural resources. These events add a public component to the work that the Trust does and offer the public an important opportunity to experience the scope, the importance, and the success of the Trust’s activities. The Trust also hopes to expand its outreach to schools through programming aimed at children, and will look for partners to offer more educational and recreational opportunities for children in the park.

Refer also to Response PR-14 for further discussion of issues raised.

PR-12. *List of Cultural Institution Concepts*

The NPS requests that the Trust list specific cultural program concepts that would carry out the essential themes of the Presidio.

Response PR-12 – At this point in time, in this programmatic-level planning document, the Trust is not in a position to specify which cultural program would be pursued to carry out themes essential to the Presidio. The two specific references made in Chapter Two of the Final Plan makes specific references to two feasibility studies mandated by Congress, one for the reuse of Building 640 (a study that is underway, in partnership with the National Japanese American Historical Society) and one the Pacific Coast Immigration Museum, a study that is being conducted by the NPS in collaboration with the Trust. The Final Plan embraces the concept of partnerships to help fulfill programmatic goals developed in collaboration with the NPS over the course of Plan implementation. It is also anticipated that the interpretive strategy for

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the Presidio, currently being developed in collaboration with the NPS, will lay the groundwork for determining the Presidio themes and stories that should be told.

PR-13. Program Themes

Several commentors assert that the program themes have changed and become too generalized from the original themes of the GMPA. They say that the current themes are value-neutral and fail to evoke the idealism of the GMPA, and recommend that the Trust realign the programming back to the more specific, value-laden themes of the GMPA. One individual is “disappointed” by the Trust programming because it undermines the vision of the GMPA. The Pacific Heights Residents Association finds that four broad, interrelated program areas stated in the GMPA are best suited for the Presidio based on its facilities, setting and park purpose: stewardship and sustainability, cross-cultural and international cooperation, community service and restoration, health and scientific discovery. The Sierra Club asks that the Trust include only those program activities proposed in the GMPA.

Response PR-13 – The four themes that commentors reference from the 1994 GMPA are programmatic themes by which tenants would be selected under the GMPA. Chapter One of the Final Plan instead articulates five interpretive themes that are intended as the focus of interpretive programming: Military History, Crossroads of Culture, Restoring Natural Systems, Changing Landscapes, and Transformation of the Presidio from “Post to Park.” See Planning Principle 11 of the Final Plan. The five interpretive themes will serve as underpinnings of the Trust’s ongoing collaboration with NPS to develop an interpretive strategy for the Presidio. The Trust does not concur with the comment that these programming goals undermine the vision of the GMPA. The kinds of programs suggested by the GMPA were exceptionally broad and would in no way be prohibited by the Final Plan.

PR-14. Relationship of Program Topics to Presidio

Commentors’ opinions on Trust programming vary widely. On one hand, commentors ask the Trust to explain how expanded concepts of education (such as the uniquely western perspective on the American experience; the role of immigration, domestic migration, innovation, and technology

advancement; and the future of transportation technology) tie in to the mandate to preserve and interpret the cultural and historic values of the Presidio. They note that recent examples of Trust programs, including Russian paintings and Japanese woodcuts, demonstrate little evidence of connection with its mission. The Presidio Tenants Council believes that “only the walks and talks sponsored by the NPS really deal with the park.” Commentors expressing this opinion by and large ask that the Trust restrict program activities to subjects related directly to the Presidio. In contrast, groups such as the Youth Commission’s Culture and Urban Environment Committee ask the Trust to expand upon existing historical, educational, and environmental programs. (“History determines our perception of the past and present . . . We ask that you continue the success of these programs; particularly in establishing a cultural center reflective of the diversity of this city and of the history of the Presidio.”)

Response PR-14 – In response to comments, the Programs section of the Draft Plan has been heavily modified, and the concepts presented there scaled back. Chapter Three, Programs, of the Draft Plan is no longer a stand-alone chapter; instead, concepts about the types of programs, collaboration with the NPS and other program partners, and park preservation and stewardship have been folded into a new section about bringing people to the park. See Chapter One, Planning Principles 11 through 14, of the Final Plan. Specifics regarding square footage and preferred locations for cultural and educational uses are now described in Chapter Two of the Final Plan. The Final Plan also states clearly that the Trust’s primary goal is park preservation and providing for a meaningful park visitor experience; thus, the Final Plan ties proposed programs back to this overarching vision.

Recent exhibitions at the Presidio Officers’ Club, which were part of the pilot program “At the Presidio,” as described in the Draft Plan, generated much comment. Many recognize the inherent quality of the programs and applaud the Trust’s contribution to the area’s cultural scene. But others question the wisdom of the Trust funding a program that appeared so ancillary to its core mission and that appeared to duplicate programming found elsewhere in the region. Since that time, and as a result of lessons learned from this pilot program, the Trust has scaled back its exhibition program, and the Plan has been revised to adjust the financial commitment to cultural programs. See

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Response PR-5. With the resources available, the Trust will focus its programming efforts on expanding park stewardship, sustainability, and education programs, and strengthening partnerships with the NPS, the GGNPA, and other program partners.

The Trust is committed to reaching the broad public in its programming effort. Programs will therefore be varied, ranging from hands-on participation and lectures to commemorative events and children’s activities. Building participation and support is a Trust goal. The Trust hopes to accomplish this by establishing a core of programs that is dynamic enough to engage the public at many levels of interest and understanding, consistent enough to develop a deeper understanding of the park, and flexible enough to grow and change over time.

PR-15. Program Priorities

Commentors had widely varying views of what would be an appropriate mix of programs, both in content and size. The NPS feels that new program facilities should be considered only if consistent with NPS Interpretation Management Policies.¹ The California Native Plant Society and others support the Trust’s intention to provide programs for visitors of all backgrounds, but are troubled by the Trust’s commitment to provide programs for visitors of “all interests.” They maintain the Trust should not try to make the Presidio “mean all things to all people”. (“...it is absolutely essential that... the mission of the park remain unaltered. People primarily interested in race-car driving, model trains, or Renaissance paintings should not expect to find fulfillment in the Presidio.”) San Francisco Tomorrow shares this opinion. (“Programming and events should be limited in purpose to subject matter

¹ Section 9.3.2 (“... should be provided only when the private sector or other public agencies cannot adequately provide them in the park vicinity...”) and Section 9.3.1.7 (“...Permanent facilities may be built specifically for cultural activities only when [5] criteria are met: necessary to tell park story, temporary facility impractical, adaptive use impossible, no impairment of cultural or natural resources, infeasible for others outside park to provide the facility.”)

areas which are special to the Presidio and appropriate for a national park.”) One business with experience in programming at Yerba Buena Gardens offers that changing social conditions and patterns makes it “extremely important to activate a space to welcome a diverse group of visitors so that one group does not dominate and disrespect this incredible national treasure.” They “support the Trust’s vision to have programming in the park that is appropriate to the space and within the budget available.” Another individual is troubled with charging “\$25 for admission to an art exhibit,” as it “simply flies in the face of the mission of the Presidio as a ‘park to the people.’”

Response PR-15 – The Trust agrees in principle that programming and events should be limited in purpose to subject areas that are “special to the Presidio and appropriate for a national park.” While the Trust is not subject to NPS Management Policies, the Final Plan is not inconsistent with the policies cited. Program facilities will primarily be located in existing buildings, and will bring people to the park for reasons that facilities outside the park could not. The Trust will ensure a consistent standard and coherent offering of park programs that is provided in collaboration with the NPS, park tenants, and other partnerships that leverage Trust resources and expand the park’s visitorship. See Chapter One, “Bringing People to the Park” section, of the Final Plan, and Responses PR-1 and PR-4.

The Trust recognizes the need for a core set of programs appropriate to the space, within the budget available, and varied enough to correspond to both diverse resources and a reasonable spectrum of public interest. Given the different kinds of space and the variety of activities, from historic preservation to habitat restoration, the programs at the Presidio will be varied. Tenant programs and activities, which may not be tied to the themes of the park, will contribute to the liveliness of the park and the vitality of the Presidio community.

PR-16. Support for Educational and Environmental Programs

A number of commentors generally express support for and/or offer specific suggestions for appropriate educational and environmental activities within the Presidio. One education and recreation organization asks the Trust to collaborate with the San Francisco Unified School District to establish a “cultural center reflective of the diversity of this city and of the history of the

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Presidio.” Another education and recreation organization is “extremely pleased” with the kinds of youth-oriented programs that are being considered, and suggests ropes courses as a team-building opportunity for young people. Other suggestions include a Presidio Children’s Center for Performing Arts, better transportation so that students can take better advantage of the park, and more youth and nature classes for Girl Scouts and Boy Scouts. Groups generally agree that the Trust should partner with organizations already working with children and foundations interested in supporting such efforts. For example, one natural resource conservation organization is very appreciative of the Presidio Trust’s ongoing support for the stewardship program, and notes that “its contributions to nursery operations, interpretive and education programs, and other stewardship programs are essential to the future of biodiversity at the Presidio.”

Response PR-16 – Many kinds of programs, including recreational programs, museums, and annual festivals, could be linked to what is essential to the park’s mission, and this is articulated in the Final Plan. The Trust will balance its resources to provide a varied offering of programs. The Trust will continue its collaboration with the NPS and the GGNPA to support stewardship programs and other educational opportunities in the Presidio. The Trust has established relationships with educational institutions and will develop other partnerships that bring expertise in youth programs. Programs could include leadership, environmental, and natural resources education, as well as interpretive and recreation programs. See Responses PR-9 and PR-11.

PR-17. Support for Arts Programs

Various commentors provide ideas about how the Trust could foster the long-term placement of performing arts in the Presidio. Suggestions include developing a multi-faceted culinary center, reserving space for square dancing and folk dancing, establishing an ‘ARTISANfrancisco’ for crafts people and a Presidio Children’s Center for Performing Arts, and providing a creative arts and media center at the Battery Dynamite site. One commentor feels that all such should be centered in nature ecology and sustainability.

Response PR-17 – The Trust will focus its own program efforts on programs that address the history, resources, and preservation of the Presidio. However, the Trust is receptive to public programs that tenants and other partners can

provide, from exhibits to performing arts. Space and time will be set aside at the Presidio for community events, such as meetings, lectures, concerts, and other entertainment and recreation. See Response PR-2.

PR-18. Museums, Exhibits, and Events

This issue generated many comments. Commentors note that the PTIP calls for roughly three times as much museum space as the GMPA. Most commentors, including the Sierra Club and San Francisco Tomorrow, feel that the Trust should exclude exhibits and museums with themes only marginally connected to the Presidio and limit exhibits and museums to those needed to interpret the military, cultural, and natural history of the Presidio. (“Allocating funds for traveling museum shows that lose money such as the ‘Treasures of Imperial Russia’ should not be pursued.”) Commentors expressing this opinion generally believe that the Trust should not construct any new museum buildings or fully fund museum space in the park. PAR and other organizations believe that any museums should be appropriately sized and Presidio-related (e.g., a museum of moderate size related to the history of the Presidio or the West). Several find little connection between the proposal for museums and institutes and the suggested themes for a Presidio interpretative program. California Native Plant Society sees “grave danger” in devoting buildings or financial resources to public events and programs that have little connection to the Presidio’s history or to the mission of the national park system. Another individual exclaims “Technology exhibits and museums have no place in a national park!” Others are more enthusiastic in their support for museums and other institutions, particularly those they consider relevant to the Presidio’s natural, cultural, and military history. For example, the Fort Point and Presidio Historical Association strongly supports facilities and exhibits on military and aviation history and museums and historical programs at Crissy Field. The historical association also refers to the recent Holocaust Exhibit as “excellent” and the lecture about the Italians and the aid they provided Jews during World War II as “fascinating,” and encourages the Trust to sponsor more such activities. Many themes for museums are offered, including a Pacific Coast Immigration Museum, a California Indian Museum, an African Heritage Museum and Educational Center, buildings (specifically Building 640 at Crissy Field) interpreting the history of the Japanese American community in the Presidio, geological museums, institutes that

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offer “a uniquely western perspective on the American experience,” and maritime military history (such as coastal artillery) and aviation museums.

Response PR-18 – As discussed in Response PR-9, the Final Plan clarifies that 530,000 square feet of space are anticipated to be used for cultural tenants and activities such as museums, interpretive sites, artist studios, theatres, and more. Of this 530,000 square feet, 100,000 square feet are already occupied or reserved, and another 100,000 square feet are targeted at the Commissary building, which may host a museum if outside sponsors and funding can be identified. The Trust recognizes the need to concentrate its resources on programs that are integral to the preservation of the park, such as stewardship and volunteer programs, and on cultural programs that make the history of the park more accessible to the broad public. The Trust believes that museum and exhibitions would be appropriate in the Presidio; however, they would have to be funded by an external source. The Trust is committed to using its resources for programs that are specific to the Presidio, but recognizes the value of other interests and perspectives and believes that a variety of programming can contribute to the vitality of the park.

Congress has requested that the Trust and the NPS collaborate to study the feasibility of establishing a Pacific Coast Immigration Museum at the Commissary, or at another site, in addition to rehabilitating Building 640 as a museum that focuses on the role of Japanese Americans in the history of the American West. The study is underway, but is in its preliminary stages. The Trust believes that each of these ideas is appropriate, if the funding can be found. Proposals for other museums that help to interpret Presidio stories would also be welcome for consideration in the future.

PROGRAM FUNDING

PR-19. Funding Mechanism for Programs

Some commentors seek clarity regarding the funding mechanism for Presidio cultural programs. For example, the California Heritage Council, while pleased that the Presidio’s history will be interpreted, asks that the Trust more closely identify the anticipated funding for each type of program (“we feel that historical, educational and cultural programs would make the Presidio a world-class park... the Trust should identify how [it] intends to acquire the

funding for these programs such as philanthropic, corporate, or a non-profit that could coordinate program activities and raise financial support privately.”). Several individuals are not convinced that the Trust should incur a “major increase” in its operating expenses to assume primary responsibility for public programs. Others, such as the CCSF Planning Department, believe that the provision of programming should not be subject to financial considerations.

Response PR-19 –The Trust believes that, as a national park, the Presidio is an appropriate place for providing programs that allow the public to explore the park, its history, and its natural resources. Although the CCSF Planning Department wishes that the provision of public park programming not be subject to financial considerations, public programs cost money. In Fiscal Year 2001, the level of expenditure for park programs was at a baseline of approximately \$2 million. The Trust hopes to increase this amount over time to \$5 million. The Final Plan sets a goal of allocating \$5 million annually in Trust revenues, supplemented by outside sources (including philanthropy), to support Presidio programs in the future. This goal is expected to be achieved over time, and at the start the Trust will sustain only a baseline level of funding for park programs while it places higher priority on funding protection and preservation of park resources.

Currently, both the Trust and the NPS dedicate funds to park programming. Cultural institutions, such as museums, are expensive to establish and operate, and would therefore have to be funded by sponsoring organizations or outside sources. To make the park more accessible through a wider range of programs and media, the Trust will attempt to augment current funding and develop a variety of partnership and funding sources, including philanthropy, to support programs beyond those currently available through the Trust, NPS, and tenant organizations. Chapter Four of the Final Plan includes additional discussion about the need for seeking philanthropic dollars through the course of implementation to achieve certain program goals. Refer also to Response PR-5.

PR-20. Programs Funded at GMPA Levels

The Sierra Club and various other commentors request that the Trust hold program and event expenses to those levels identified in the GMPA. Both the

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Sierra Club and the NPS ask the Trust to include in parkwide expenses a base level of funding for programs, museum collections, and natural resource projects that are clearly linked to the park’s mission, its sustainability, and the future of biodiversity at the Presidio. The NPS further recommends that program expenses be based on the stated mandates of the Trust Act to conform to the GGNRA enabling legislation, the general objectives of the GMPA, and the need to manage the resources of the park. Several of the commentors maintain that any level of programs and related expenses above the GMPA level would result in a delay of the rehabilitation and availability of buildings at the Presidio, and should be provided only if funded by outside sources, rather than the Trust budget. California Lawyers for the Arts believes that the community would be “better served by expediting the return to active use of the buildings in the park—allowing the tenants to provide programs.”

Others, such as San Francisco Beautiful, disagree with this base level and suggest that allocating \$10 million to programming is a “reasonable, even modest,” annual Trust budget for program activities. One individual tells the Trust, “I support your idea of putting \$10 million towards programming, specifically youth programming, in the form of grants, space, and other support.”

Response PR-20 – The Trust agrees with commentors that a baseline level of funding to support park programs is both needed and desirable. Important park programs, many that are linked to some commentors’ interest in fostering programs related to educational, environmental, and natural resource protection goals, are currently being funded by the Trust, and the Trust hopes and expects to continue these programs. Examples of some of the programs benefiting from Trust revenues are identified in Chapters One and Two of the Final Plan. The Trust is likely to provide only a baseline level of park programming and funding support that may include one-time capital investments for establishing a program venue and/or funding of annual operating costs. The Trust disagrees, however, that it should limit its goals for park program funding to a baseline level (assumed for purposes of PTMP financial modeling to be \$2 million annually) as a long-term goal. In a national park setting, particularly in this urban area, providing publicly accessible park programs is appropriate. Indeed, many Presidio buildings, some historic, may be suited to and best reused as program venues.

Rehabilitating these buildings will be expensive and will require critical investment to help expedite, as one commentor suggests, “the return to active use of buildings in the park.” To encourage program uses, the Trust may want to be able either to provide capital funds to rehabilitate the building or to offer funding support to program users. Constraining funding goals to some baseline may limit the extent of public-serving uses or programs in the Presidio, a result the Trust believes is undesirable. Therefore, the Final Plan establishes a goal to increase Trust funding support for park programs over time to \$5 million annually, an amount that is still somewhat modest, as recognized by a few commentors who believed a higher goal would have been appropriate given the high cost of establishing and maintaining program uses. See Response PR-5.

PR-21. Philanthropic Support

Many commentors believe that the Trust should not allocate Trust revenues, but instead aggressively pursue funding through philanthropy. (“Funding of these expanded programs should be...financed by outside charitable sources, with no cost to the Trust for either operating or capital costs... The proposed expanded level of programs should not be included in the Trust budget.”) They ask that the Plan identify how the Trust intends to raise financial support privately. One individual states that reasonable assumptions of philanthropic revenues should become part of future financial analyses. Another individual offers that “current tax/gift regulations are being eased and this should be attractive to those most capable of donating large sums.”

Response PR-21 – In response to comments, the Trust has reduced its annual program funding goal in the Final Plan by \$5 million per year. See Response PR-5. The Trust will provide a baseline level of park programming and funding support that may include one-time capital investments for establishing a program venue and/or funding of annual operating costs. Funding is projected to increase gradually from \$2 million annually to \$5 million annually. The Plan now states that the Trust will actively pursue philanthropic support for both programs and natural resource projects. How the Trust intends to do that, however, is not part of the Plan, which is primarily a land use plan. A variety of funding options will be explored prior to program implementation. It is too early, and would not be fiscally prudent or

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conservative at this time, to make “reasonable assumptions of philanthropic revenues” for inclusion in the PTMP financial analyses; thus such assumptions are not included in the financial analysis. (Refer also to Response FI-29.)

PR-22. Explaining and Allocating Funds to Programs

Several commentors seek clarification of how funds would be allocated to programs and ask the Trust to reconcile cost inconsistencies. A neighborhood group asks “Where will the money go? ... What mitigations are you going to use to ensure for financial viability of such programs?... How will it be invested? Will it be used for more museums and events that will lose money as the Russian Show did? Who decides these programs?” Another commentor states that the Trust anticipates spending at least \$10 million per year on these programs, but the actual annual program expense could be \$23 million or much more, depending on which programs are pursued. Another individual tells the Trust that “your program cost of potential programs is \$19-\$22 million but you only list \$10 million in your table and there is no note as to why there is a difference between these two significantly different figures.” In light of this uncertainty, the NRDC letter recommends that the Trust explain how the \$10 million programming goal was derived and on what it will be spent, since \$10 million per year is insufficient to fund the operating and capital costs of all proposed programs, and identify the minimal level of programs that will be covered annually. The GGNRA Citizens’ Advisory Commission further recommends that the Trust disaggregate the \$10 million (and the 930,000 square feet) proposed for interpretation and cultural/educational programs.

Response PR -22 – There is some confusion on the part of commentors with regard to Table 3.1, Potential Programs, on page 74 of the Draft Plan. This table was intended only as a menu of potential program options that could be considered in the future at the Presidio. The list was not intended to be all-inclusive or prescriptive for Presidio programs. For each program listed, one-time capital costs for set-up and an annual operating cost were cited to give reviewers a realistic idea of how expensive establishing and maintaining program uses can be.

For each of the alternatives studied in the Draft EIS, including the Draft Plan Alternative, different levels of program dollars and program space were assumed and analyzed. The different total funding amount indicated the relative importance of the program component for each alternative. Under the Draft Plan Alternative, \$10 million was assumed as the annual cost of programs presented in that alternative; the \$10 million estimate was used for purposes of financial modeling for the Draft Plan Alternative. Program costs assumed for other alternatives ranged from \$2 million to \$8 million in the Draft EIS. In the Final Plan Alternative, the \$10 million estimate has been reduced to \$5 million and would be achieved over time. See Responses PR-20 and PR-21.

The Final Plan clarifies the Trust’s (revised) commitments regarding programs, eliminates Table 3.1, and sets forth overall program goals and objectives. See Planning Principles 11 through 15 in Chapter One of the Final Plan. The Trust will provide a baseline level of park programming and funding support that includes both one-time capital investments as well as annual operating costs. Funds will be allocated as part of the annual budgeting process, which will weigh competing factors associated with the overall Presidio budget and work plan. See Chapter Four, “Resource Preservation and Enhancement: Priorities and Timing” section, of the Final Plan. Presently, both the NPS and the Trust contribute money to Presidio programs. The NPS supports interpretive rangers and visitor center activities through its annual appropriated funds; the Trust contributes funds and resources to interpretive programs as well as the native plant nursery, stewardship and archeology programs, and a limited number of exhibits and events.

The Trust has recently redirected its focus to those programs that create opportunities for visitors to explore the Presidio’s history and contribute to its long-term preservation. The Trust plans to expand stewardship, sustainability, and education programs, and will look for innovative ways to bring the history and resources of the Presidio alive for a diverse public. As stated in the Final Plan, the Trust will also strengthen existing partnerships with the NPS and the GGNPA, and engage other organizations as program partners. The Trust is engaged with the NPS in developing an interpretive strategy for the Presidio that will provide some of the framework for future programs. The Trust will also consider an annual public workshop to receive input on programs.

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PROGRAM SELECTION

PR-23. Program Criteria

Commentors seek an explanation of the process and specific criteria that will be used to select proposed programs. They ask how tenants and their prospective programs and services would be represented in the marketing of the park, how aesthetic and policy decisions about what groups to support would be made, and who would select the programs. The NRDC letter requests criteria that will be used to establish the number and content of museum programs, and asks whether and how cost and revenue will be factored into the decision, and whether and how the public will be entitled to participate. Others recommend solutions. (“He who pays the piper calls the tune,” is a position not always consonant with the ideal of free expression on public soil. I strongly recommend that a guiding panel of experts, including some Trust officials, shepherd the selection of Presidio programming, ensuring that the palette broadly speaks to many constituencies, including the Trust’s.”) The Fort Point and Presidio Historical Association recommends that the Trust consider “identifying a non-governmental, non-profit entity that could effectively coordinate program activities and raise financial support from private philanthropy.”

Response PR-23 – With regard to implementation of the PTMP, which will include activities such as tenant selection, program development, additional planning and opportunities for public input in implementation decisions, see Chapter Four of the Final Plan. As stated in this chapter, the level and nature of programming will be influenced by three major factors: (1) the ability of the Trust to generate funds to pay for a program’s operating and capital costs, whether through leases of philanthropy; (2) the effectiveness of collaborative efforts between the Trust and the NPS; and (3) the ability of the two agencies to engage other partners. The Final Plan does not specify subject matter or define particular programs because these decisions are highly contingent on interest, availability, partnership opportunities, and internal and external funding, all of which are presently still unknown.

However, the Trust and the NPS are in the process of developing an interpretive strategy for the Presidio that will provide a framework for some program decisions. That planning process has engaged public input through

several workshops, and before its completion there will be additional opportunity for public input.

The PTMP is a land use policy plan. It is neither a program-specific plan nor a marketing plan, and therefore does not propose a detailed program budget. Through the course of implementation, costs will certainly be a factor in determining the kinds of programs that the Trust can provide. As stated in the Final Plan, however, the Trust is committed to establishing a core set of programs that it hopes will grow over time. Feasibility studies that explore a variety of funding options will be conducted as part of program implementation. The Trust has not yet investigated the possibility of establishing an external body to oversee philanthropic development, but the Trust will itself begin to explore ways to engage philanthropic support for both programs and resource restoration. The Trust is already engaged with the NPS and GGNPA in joint marketing of Presidio venues, and will evaluate ways to market Presidio programs.

The NRDC recommends that the PTMP include criteria for the number and content of museum programs. Since the PTMP is a general land use plan, it provides the framework for but not the specifics of future decisions that would include museum uses. The PTMP allocates square footages by use category, including cultural uses that could encompass museums, and states a preference for locations for these uses. The Trust believes that museums would be appropriate at the Presidio if they are thematically relevant and financially feasible. See Responses PR-6 and PR-18. The Trust will consider using annual public workshops to engage the public in determining program content and priorities. See Figure 4.3, Public Involvement in Planning and Implementation Decisions, in the Final Plan for more information on additional public involvement opportunities related to implementation of the PTMP.

PR-24. Program Plan

A number of interest groups ask the Trust to develop a park-wide plan for cultural and conference uses. They ask that the plan be completed before demolishing historic or income-producing buildings or commencing any new construction in historically sensitive areas. They recommend that the plan “set goals and identify fund-raising programs and mechanisms to identify how

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the Trust intends to acquire funding for programs.” Furthermore, they ask that the Trust explain how the public will be an integral part of programming and state the public process for developing the appropriate mix of park programs. (“Given the sensitivity of the issues of cultural diversity and increasing access faced by an urban national park, community input into the programming decisions seems highly desirable.”)

Response PR-24 – The PTMP provides the programmatic, park-wide plan for cultural and conference uses requested by commentors. The PTMP envisions that approximately one-third of the Presidio’s (Area B) building space would be dedicated to public-serving uses, including educational and cultural programs. The Plan identifies those buildings currently used for cultural purposes and indicates in what districts cultural and educational uses would be preferred. This level of specificity is included in response to commentors’ questions and suggestions. See responses to Lodging comments regarding conference facilities.

The PTMP is a general land use policy plan that is the foundation for future planning and decision-making. It does not include building-specific information, such as individual building treatments and uses, but rather provides parameters for future land use decisions. See Responses TP-2 and TP-3. Any future proposed actions that would call for building demolition or new construction will be the subject of additional planning, analysis, and public involvement.

The Trust recognizes the need to develop philanthropic support to enhance programs at the Presidio, and believes that it is more likely to engage long-term program support as it develops a vision for programs and demonstrates the viability of that vision. See Response PR-23 with regard to funding for programs, priority-setting, decision-making, and additional public involvement in programs.