

4.5 ALTERNATIVES (AL)

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SUPPORT FOR DIFFERENT PLAN ALTERNATIVES

AL-1. *Implement the 1994 GMPA*

A number of individuals urge the Trust to re-commit to the GMPA adopted in 1994. These individuals feel that the GMPA remains the most desirable guiding document for the Trust because it engendered broad public support, best protects the park's historic and natural resources, and minimizes new construction. One individual asks "Since the Presidio Trust documents show that the GMPA meets the Congressional mandate of achieving financial self-sufficiency by the year 2013, why doesn't the Trust implement the GMPA?" Another individual: "Now is certainly not the time considering the psychosocial climate of the US to veer drastically and unnecessarily from a perfectly good, widely-agreed-upon plan that the NPS worked on with massive public input and support. A hundred or so years of dealing with similar issues has taught them a thing or two about how to proceed even with

such new projects and ideas. Stop trying to end-run the professionals—and the public." Another commentor believes that the Draft Plan "was created to circumvent the GMPA."

Response AL-1 – The 1994 GMPA in all its original content simply is no longer a physical possibility; it cannot be implemented exactly as it was written. Preparation of the GMPA began in 1990, spanned four years, and another eight years have passed since the NPS finalized and adopted it in 1994. Altogether, it has been almost 12 years since the concepts of the GMPA were proposed, evaluated, and adopted. The 1994 GMPA is a relatively prescriptive and site-specific plan. A plan like the GMPA is a living document and inexorable changes that accompany the passage of time tend to limit the shelf-life of any plan that is so specific and prescriptive.

Therefore, to the extent commentors are requesting that the Trust default back to the 1994 GMPA and adopt and implement it in all its particulars and details, that is not possible. As examples, the Letterman Complex EIS modified the GMPA with respect to the specific plan for the former LAMC and LAIR facilities that have now been demolished. Also, the location of the Presidio fire station was moved (under a proposal by the NPS) to a different location (i.e., its existing and historic location) from that called for in the GMPA. Also under an NPS proposal, the buildings along O'Reilly Avenue have been rehabilitated and reused as office space (part of the Thoreau Center for Sustainability), rather than lodging as prescribed by the GMPA. The GMPA assumed that the Sixth U.S. Army would continue to use approximately 30 percent of the Presidio's square footage of building space, including about half the available housing. The Army's presence was anticipated to be a significant benefit to the Presidio; the Army was to pay for direct expenses for buildings, facilities, and other occupied property and would share the operating expenses common to Presidio tenants. Shortly after the NPS adopted the GMPA, however, the Department of Defense decided to move the Sixth U. S. Army and to vacate the Presidio permanently. The Army's departure had a dramatic effect on the GMPA's building occupancy projections. The GMPA assumed that the Sixth U.S. Army would occupy 277 buildings, comprising 1.8 million square feet of residential and non-residential building space (totaling 30 percent of the Presidio square footage), for an indefinite period, but the Army had largely departed the Presidio by 1994.

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These and other changes, including creation of the Presidio Trust, have altered the GMPA in all of its exact detail as it was conceived and adopted in 1994. Please refer to Chapter 1 (Purpose and Need) of the Final EIS (Volume I) for additional information on this subject.

Nevertheless, there are many aspects of the GMPA that are still possible to implement. These elements of the GMPA have been carried forward into the No Action Alternative (GMPA 2000) for consideration in this planning process. As noted in the Alternatives Section of the EIS, “This [GMPA 2000] alternative would implement the 1994 GMPA for the Presidio assuming year 2000 conditions.” Furthermore, many features of the 1994 GMPA have been carried forward into all alternatives, including the Final Plan Alternative, as common features. They are generally policies and actions from the original GMPA that the Trust has been implementing and that remain viable regardless of other planning considerations. These common features are explained in Section 2.2 of the EIS and include continuation of many existing leases, removal of Wherry Housing, an emphasis on historic building rehabilitation, and housing of Presidio-based employees.

The No Action Alternative (GMPA 2000) was formulated to reflect updated conditions, not to “circumvent the [original] GMPA” as one commentator contends. Quite to the contrary, the No Action Alternative (GMPA 2000) is a version of the original GMPA created as a viable option for consideration even though the original 1994 GMPA could have been screened out as financially infeasible. Through the consideration and evaluation of the No Action Alternative (GMPA 2000), the Trust has made it possible, as urged by commentators, to consider a re-committment to the GMPA, assuming that all present day (Year 2000) conditions exist.

The Trust believes it is important for commentators to understand this distinction between the original GMPA and the No Action Alternative (GMPA 2000). For example, some comments assert that the GMPA meets the Congressional mandate of financial self-sufficiency, and the Trust should simply implement it. In fact, the 1994 GMPA was far from self-sufficient. It assumed \$16 to \$25 million in annual federal funding in addition to federal subsidization through Army tenancies. It also assumed any financial shortfall would be made up through philanthropy. In no way is the original 1994

GMPA financially self-sufficient. It is only with current updates and modifications through the year 2000 that the No Action Alternative (GMPA 2000) had the potential to become financially self-sufficient. This potential is based upon a number of conservative but favorable financial assumptions made for purposes of the financial analysis of planning alternatives. See Responses FI-15 through FI-24 for further discussion of the financial viability of the No Action Alternative (GMPA 2000).

AL-2. Adopt the Draft Plan, a Modified Draft Plan, or the No Action (GMPA 2000) Alternative

Some commentators write to register their support for the Draft Plan, a variation of the Draft Plan, or the No Action Alternative (GMPA 2000). Some commentators urge the Trust to adopt the Draft Plan for such reasons as “it very ably balances the many interests of all segments of Bay Area society,” or “responds well to the challenges of an urban park.” (Commentors also offer that the EIS is “thorough and comprehensible and in need of no further circulation or amendment.”) San Francisco Beautiful supports the Draft Plan (with modifications) and its “attempt to balance the Presidio’s values of natural open space, history, scenic views, education, and recreation.” Others express confidence in the Trust for preserving the park and for “a job well done.”

The largest group of commentators, including many of the neighborhood organizations, urge the Trust to adopt an alternative based on the spirit and vision of the original GMPA (“...because it’s financially viable, it’s what the public wanted in 1994 and what the public wants now and that tenant organizations in a National Park should be programmatic park partners.”) Some of the commentators offer that they recognize that the GMPA requires updating in order to reflect “the realities of the Trust Act as well as four years of experience with potential tenant interest and program support” but feel that the extent of changes called for in the Draft Plan is “unnecessary and in many ways detrimental.” Other organizations, including PAR and the Lake Street Residents Association, state that the Draft Plan should be substantially modified in scale and design to “more closely reflect the GMPA 2000 and the original vision and goals of the GMPA of 1994.” NAPP makes an “overarching request” to have the Draft Plan more closely reflect the 1994

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GMPA by “reducing the level of new construction and operating costs and place a priority on leasing buildings to GMPA mission-related tenants.”

Response AL-2 – The Final Plan proposed and distributed by the Trust, along with the Final PTMP EIS, have not been adopted by the Trust Board. It is offered as the Trust’s proposed Final Plan based upon the Final Plan Alternative analyzed in the Final EIS (which is the Trust’s preferred alternative). Under NEPA, the Trust has not and cannot finalize its Plan until it prepares a Record of Decision selecting from among the alternatives and explaining the basis for the alternative’s selection. Refer to Response EP-34 for additional information on the Record of Decision. The response offered here concerning the proposed Final Plan is preliminary and based upon the entire record to date.

As its proposed Final Plan, the Trust has not followed the urging of many commentors to conform to an alternative as closely aligned as possible with the original GMPA (i.e., the No Action Alternative (GMPA 2000)). Nevertheless, in proposing the Final Plan, the Trust has fully and seriously considered the No Action Alternative (GMPA 2000) as a plan option. The discussion below focuses on those aspects of the No Action Alternative (GMPA 2000) that commentors most wanted the Trust’s proposed Final Plan to retain and explains the basis for proposing a different approach.

Many commentors who favor the No Action Alternative (GMPA 2000) express their approval of its vision, tenant selection standards, and approach to programming. Under the GMPA approach, tenants would give the Presidio a higher purpose. They would be selected based upon their organization’s purpose and ability to contribute to “improving human and natural environments” and “addressing the world’s most critical environmental, social, and cultural challenges” and to provide park programs on these and other related themes (e.g., global cooperation, environmental sustainability). The goal of all tenant selection would be to turn the Presidio into a global center dedicated to addressing world challenges. Although it has captured the imagination of many commentors, the GMPA vision, particularly as it is tied to and places constraints on tenant selection, poses the greatest implementation difficulties for the Trust.

These difficulties derive from the ways in which the GMPA vision, tenant selection, and programming approach potentially conflict with the Trust’s core mission. As described further in the Final Plan itself, that basic mission is to preserve the Presidio as federal parkland and to protect the Presidio’s cultural, natural, scenic and recreational resources for public use. The Trust’s mandate is not to create a global center, nor to solve the world’s problems, nor even to create a park with any purpose higher than the one that Congress created the Trust to uphold. The challenges posed by the Trust’s Congressional mandate alone are formidable. As recognized by Congress, the Presidio contains unique historic structures that are extremely expensive to rehabilitate and maintain. Congress has mandated that the Trust lease Presidio property in order to generate the revenues needed to undertake capital improvements, estimated at \$589 million, and to support its long-term operations and maintenance, estimated at between \$37.3 to 52.8 million annually. If the Trust is constrained to seek out only specific types of tenants with a socially-oriented focus, that constraint makes the Trust’s financial success much more difficult to attain and therefore jeopardizes the successful protection of the park itself by irreparably burdening the Trust’s capacity to lease the buildings.

The entrepreneurial change imposed by Congress, requiring the Trust to lease Presidio buildings to pay for the park, has created uncertainty in the minds of some commentors about the future of the park itself. The fear that the park will become nothing more than a real estate operation that “rents to the highest bidder” has replaced the fear that the park will be lost to the public if we cannot make it pay for itself.

Both anxieties indicate that the Trust’s financial requirement and its mandate to preserve and protect the park cannot be separated. Financial self-sufficiency can be achieved in any number of ways, but if it is done without ensuring the rehabilitation of the Presidio’s historic buildings and landscapes, the restoration of its natural resources, and the preservation of its distinct character, the goals set forth by Congress will not have been accomplished. The Trust therefore opted in its proposed Final Plan for the more conservative, albeit less ideologically captivating, focus on solely preserving and enhancing park resources, rather than on doing so while creating a “global center” to address the world’s problems. The Final Plan envisions a diversity of tenants: non-profit and for-profit, large and small, with no explicit requirement that

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they all pursue a related mission. In the Trust's judgment, this approach has a higher likelihood of financial success and a higher likelihood of ensuring the timely preservation of the Presidio's resources.

Other primary reasons some commentors note for favoring the No Action Alternative (GMPA 2000) include its smaller amount of building space, the smaller amount of potential new construction, and the generally lower level of public uses and therefore visitor activity. When viewed in comparison to the No Action Alternative (GMPA 2000), these commentors frequently characterized the Draft Plan Alternative as having excessive and inappropriate development, programming and activity. Clarification and modifications made in response to comments and now reflected in the Final Plan Alternative may ameliorate commentors' concerns about "excessive development." Furthermore, the Trust believes and expects that a more clear and concise description of the proposed Final Plan will make what appeared to be drastic differences between the Draft Plan and the No Action Alternative (GMPA 2000) less significant.

The Final Plan now makes clear that the PTMP calls for reducing existing developed space. The Final Plan proposes to reduce the number of presently existing buildings, eliminating 360,000 square feet or more of building space over time and thereby expanding open space in Area B by almost 100 acres. (This was also true of the Draft Plan Alternative, but apparently was not clear to reviewers.) Therefore, under the Final Plan Alternative, approximately 75 percent of the Presidio will be open space, much of it providing valuable natural and endangered species habitat. Buildings and activities will be concentrated in already developed areas with easy access to transportation, reinforcing community life, reducing automobile use, and making land use patterns and resource use more sustainable. Of the building space, about one-third (a similar percentage to the GMPA) is proposed for public purposes, including educational and cultural uses, interpretation, small-scale lodging, and other visitor amenities. Another third (a higher percentage than in the No Action Alternative (GMPA 2000)) will provide housing, and the remaining third will be used primarily as office space (a similar percentage to the No Action Alternative (GMPA 2000)). The Trust does not agree that this Plan – which increases open space, reduces overall building space, and provides for more visitor-serving uses – is "excessive development."

The fact that seems to have evoked the greatest concern is the potential for new replacement construction. Commentors seem to suggest that the Plan's potential for new construction will be misused to turn the Presidio into an urban redevelopment area indiscernible from its City surroundings. That is simply not the case. The proposed Final Plan calls for demolition of about 1.1 million square feet of existing building space, mostly non-historic housing units that would be removed to enhance and restore natural riparian and endangered species habitats. The Final Plan allows the possibility, not the certainty, that up to about 700,000 square feet of this demolished space could be replaced in already developed areas. The purpose of new construction would not be unfettered new development to "urbanize" the Presidio, but rather replacement construction targeted at accomplishing other policy goals of the Final Plan.

Specifically, new construction in the form of building additions or annexes may allow the best opportunity for adaptive reuse and rehabilitation of the Presidio's historic structures. The Trust does not want to be precluded from considering this type of new construction as an option for preserving the Presidio's historic building resources. Furthermore, because the Plan calls for removing so much of the existing housing stock within the Presidio to achieve open space gains, the Trust does not want to be precluded from replacing some of these units through the construction of new, more modern units better suited to present-day housing demand. Replacement of these units is desired both because housing provides the most stable revenue source to support other Presidio needs and also because providing sufficient housing for those who work within the Presidio is a means to re-create community values that have always been a part of the Presidio's history, to reduce automobile trips and impacts, and to ameliorate the housing shortage in the greater San Francisco area.

The potential square footage envelope of new replacement construction under the proposed Final Plan is higher than that in the GMPA largely because of the difference in the housing policies between the two alternatives. Under the No Action Alternative (GMPA 2000), housing is removed with no certainty of replacement, whereas in the Final Plan Alternative, most or all of the removed non-historic housing units would be replaced. The Final Plan allows for the possibility that this housing goal could be achieved partially through new

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replacement construction (of 200 to 400 units). New replacement construction to meet housing goals would be only one tool for replacing housing units; others would include subdivision of existing housing units and conversion of non-residential space to residential use.

There may also be other good reasons to consider using new replacement construction as a Plan management tool that cannot now be foreseen under the proposed Final Plan. In fact, the GMPA itself called for about 171,000 square feet of new construction before 2000 and about 220,000 square feet total by 2010, in addition to new construction on the Letterman Hospital site. So even the GMPA recognized that new construction could serve legitimate purposes, particularly in areas where so much emphasis is placed on reusing buildings. To some, the GMPA's level of new construction may seem acceptable while that of the PTMP does not because the location and purpose of new construction was generally specified in the GMPA; all but 100,000 square feet of new construction was generally located on the various illustrative plans. As it turns out, the instances of new construction specified in the GMPA have not served the realistic needs of rehabilitation projects and therefore have not proved accurate. The Final Plan does not repeat this error. Instead, the proposed Final Plan addresses public concerns and the uncertainty regarding the location and need for new construction through qualitative guidelines and procedural safeguards. If or when the Trust proposes significant new construction, the proposal will be subject to full and appropriate public and environmental review as well as historic compliance review under the NHPA before any action is approved. Thus, the public's fears that the Trust intends to use new construction to "over-develop" the Presidio are not borne out by the content of the proposed Final Plan.

Lastly, many commentators favor the No Action Alternative (GMPA 2000) because it provides for a smaller volume of visitors to the Presidio, and smaller volumes of residents and employees. Both the No Action Alternative (GMPA 2000) and the Final Plan Alternative share a dedication to the preservation of open spaces. Under the No Action Alternative (GMPA 2000), the public would enjoy numerous opportunities to use, enjoy, and learn from the Presidio's substantial open spaces and natural areas. The Trust fully agrees that the Presidio is a magnificent and scenic area of open space within a large urban area where open space is an important and even essential refuge for

park visitors and urban dwellers alike. As with the No Action Alternative (GMPA 2000), the proposed Final Plan offers these same opportunities.

One difference between the alternatives is in the extent to which the building space at the Presidio would generate interest for visitors in each. Under the No Action Alternative (GMPA 2000) and the Final Plan Alternative, a similar percentage of Presidio building space is anticipated to be used by public or visitor-serving uses, including cultural uses, park programs, education programs, lodging and meeting space, recreational space, and other visitor amenities. This percentage equates to about 130,000 more square feet in the Final Plan Alternative. Under the Final Plan Alternative, a higher percentage of building space (about 640,000 square feet more building space) is anticipated to be in residential use than in the No Action Alternative (GMPA 2000), and a similar percentage of building space (about 160,000 square feet more building space in the Final Plan Alternative) is anticipated to be in office use.

In crafting the Final Plan, the Trust has carefully taken into consideration the extent of environmental impacts of each alternative. While the level of use and therefore the extent of impacts is somewhat lower under the No Action Alternative (GMPA 2000), the impact assessment of the Final Plan reveals that the projected number of Presidio residents and employees would not differ significantly from 1990 levels, when the Army occupied the Presidio,¹ and that visitorship levels (revised in the Final EIS) would not result in unmitigable impacts. Since the 1989 base closure announcement, the level of activity in and around the Presidio has been quite low, and the local public has become accustomed to that lower level of activity. That does not mean, however, that a low level of activity should be pursued as a policy goal. The

¹ For historical comparison, in 1990 during the Army's occupation of the site, there were approximately 5,500 employees at the Presidio with 4,700 living on-site. The Final Plan Alternative projects a somewhat higher number of employees (6,890) but also a smaller number of residents (3,770). Under the No Action Alternative (GMPA 2000), 6,460 employees are projected and, due to the removal without replacement of housing, significantly fewer residents (1,660).

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Trust believes its efforts should go toward limiting inappropriate and excessive use of the Presidio that could lead to larger than necessary environmental impacts (such as unnecessary automobile use). These potential impacts will be limited to the extent possible by implementing environmental mitigations identified in the EIS, as well as in the Final Plan itself, which includes a very aggressive transportation demand management program.

The Trust does not believe, however, that the Final Plan or its policies should discourage public use of the Presidio. The Trust believes that establishing other public-serving uses within the buildings of the park, even and especially if these uses draw visitors, is important and appropriate exactly because the Presidio is a public park. The Final Plan therefore envisions a variety of cultural uses, including the possibility of interpretive sites, museums, artist studios, performing arts venues, or others, located principally at the Main Post and along Crissy Field (Area B). These uses may draw more visitors than the mix of uses under the No Action Alternative (GMPA 2000), but the Trust believes encouraging public visitation of a national park is appropriate, particularly where that level of use will not substantially differ from past levels of use of the site, or result in unmitigable impacts.

For all of these reasons and others, the Trust believes that its proposed Final Plan is, as a few commentors note, a good balance among the Presidio's diverse and sometimes competing values, and the Final Plan Alternative is the Trust's preferred alternative.

AL-3. *Adopt the Minimum Management Alternative*

A few individuals state that the Minimum Management Alternative is “far and away” the best alternative for complying with the Section 104(c) requirement of the Trust Act to reduce expenditures and increase revenue to the federal government. One individual advocates the Minimum Management Alternative on the basis that it “will provide the Presidio with the best possible financial cushion against adverse economic conditions and unforeseeable heavy expenses, such as natural catastrophes.” Another individual believes that the Minimum Management Alternative “appears to be the most cost effective and the least harmful to this historic site.”

Response AL-3 – Primarily for the reason explained below, in addition to other reasons that may be more fully expressed in the PTMP Record of Decision, the Trust chose not to propose the Minimum Management Alternative as its Final Plan or identify it as the preferred alternative.

The Trust recognizes, as these commentors point out, that the Minimum Management Alternative would achieve financial self-sufficiency and full implementation of capital improvement needs for the Presidio more quickly than any other alternative. In this respect, it has the potential to be financially more successful than any other alternative. The Trust can achieve financial self-sufficiency in any number of ways, however, and financial success cannot be viewed independently from other plan goals. This alternative fails to increase open space, fails to restore critical natural habitats, provides limited experiences for the park visitor to use or enjoy Presidio building space, and comes as close as any alternative to commentors' fears of turning the Presidio into a “business park” because building users are selected primarily for their ability to pay the highest rent. Therefore, in the Trust's view, this alternative places undue emphasis on maximizing financial returns at the expense of other important policy goals related to the core mission of the Trust.

EVALUATION OF OTHER ALTERNATIVES

AL-4. *Address the Proposal Made in Scoping Comments*

Several commentors maintain that they provided the Trust with proposed alternatives as part of their scoping comments for inclusion in the Draft EIS, and that their alternatives were not “properly constructed” for consideration. One group of natural resource conservation organizations states: “We regret that the Trust... chose to develop their own GMPA alternative, rather than work with us to flesh out ours. Our option would have differed in key respects from the Trust's preferred plan as well as the GMPA 2000 alternative...” The NPS says that they asked the Trust to “examine the GMPA and develop an alternative that makes the minimal modifications necessary to the GMPA to allow the Trust the planning flexibility it feels is warranted.”

Response AL-4 – The Trust disagrees with commentors that it failed to adequately address concepts and alternatives suggested during the scoping period. During the scoping period (from July 12, 2000 through January 16,

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2001), the Trust took the somewhat unusual step of presenting for public comment proposed conceptual alternatives to be addressed in the Draft EIS. One of the scoping period alternatives (Alternative A) was an alternative based upon the 1994 GMPA. The Trust's initial financial analysis of this alternative predicted that the GMPA scoping alternative would not meet the financial threshold of self-sufficiency required by the Trust Act. Several groups submitted comments raising concerns that the Trust had constructed the scoping Alternative A so as to eliminate it from further consideration, and made suggestions in scoping comment letters to reformulate the No Action Alternative (GMPA 2000) for consideration in the Draft EIS to make it both true to the 1994 GMPA and also financially viable. The Trust did exactly that, as described in Response AL-1. The Trust patterned the No Action Alternative (GMPA 2000) on the 1994 GMPA, but modified it, as requested by scoping comment letters, in only those ways necessary to make the alternative financially viable. As the NPS requested, the Trust essentially found the "tipping point" where the GMPA would be a financially viable proposal for consideration. As explained in the Draft EIS (page 407), "Changes to the GMPA 2000 [scoping] alternative in response to scoping comments ... converted this alternative into the one requested by commentors. Specifically, by modifying assumptions regarding the timing of demolition of Wherry housing and changes in conditions since the GMPA was adopted, the GMPA 2000 alternative has been made to 'work' from a financial perspective in that it would achieve self-sufficiency by 2013. This alternative now poses a viable option for decision-makers."

A number of different scoping comment letters asked that the Trust develop alternatives that analyzed a revised but financially workable version of the GMPA, and each contained somewhat different suggestions. The commentor now claiming that the Trust failed to consider its alternative, described as the "Revised GMPA Alternative," base their criticism on principles and characteristics, all summarized in bullet-point format, in their letter. All of the principles and characteristics were potential independent variables that could be associated with any alternative and that the Trust considered in developing the array of alternatives analyzed in the Draft EIS.

This of course was only one set of comments received during the scoping period, and the Trust had the challenge of incorporating the many diverse

suggestions of a full array of commentors. The Trust weighed the similarities and differences among commentors' varied suggestions and developed a GMPA-based alternative, as requested, that addressed as many of the commentors' concerns and ideas as possible. Although some commentors would have preferred that their specific list of variables, components, and assumptions be developed into its own unique version of the No Action Alternative (GMPA 2000), NEPA does not require that the Trust analyze every conceivable alternative, only that the Trust consider a reasonable range. By assuring that each "principle" and "characteristic" offered by the scoping comments was encompassed within the array of alternatives considered in the Draft EIS, the Trust fully satisfied NEPA.

The text below provides a brief outline of where and how the different components of the scoping commentors' suggestions have been incorporated into the No Action Alternative (GMPA 2000) as well as across the range of alternatives:

Tennessee Hollow – Some scoping commentors asked that their requested "Revised GMPA Alternative" protect and enhance natural resources, including restoration and expansion of a viable Tennessee Hollow riparian corridor from its source to the Bay sufficient to create wildlife migration corridors. The No Action Alternative (GMPA 2000) formulated for analysis in the Draft EIS includes these elements.

Section 2.3 of the Draft EIS described common features for all of the alternatives, unless noted otherwise. Many of these common features were policies and actions that the Trust has either been implementing or believes remain viable. The degree to which these concepts would then be carried forward became variables within the alternatives, but the essence of each concept was assumed for all alternatives. The restoration of Tennessee Hollow was included as a common feature in all alternatives except Minimum Management. "As provided for in the 1994 GMPA, the Tennessee Hollow riparian stream corridor would be restored to the extent feasible following further study and environmental review." (Final EIS, Section 2.2.) As requested by scoping comments, the Trust included this element for analysis in the No Action Alternative (GMPA 2000). Existing non-historic housing units in the stream corridor would be removed to enable restoration of the

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stream corridor. A similar level of restoration was considered in the Draft Plan Alternative and the other alternatives.

In the Final EIS and Final Plan Alternative, the commitment to the restoration of Tennessee Hollow is the same as in the draft documents, but with updated information on the Trust's work since the release of the draft documents. In Fall 2001, the Trust initiated planning for Tennessee Hollow with the goals of restoring a functioning stream ecosystem with associated riparian and wetland habitats; improving the quality of freshwater flows into Crissy Marsh; improving management practices in the surrounding watershed; protecting and enhancing cultural and archeological resources; providing recreational, educational, and interpretive opportunities; and adapting existing infrastructure to support the restoration. Planning for Tennessee Hollow is anticipated to be a near-term implementation activity following the completion of the PTMP process. See Responses PG-30, PG-31 and BR-5.

Crissy Marsh – Some scoping commentors asked that their requested “Revised GMPA Alternative” protect and enhance natural resources, including Crissy Marsh, and suggested demolition of the Commissary and PX to expand and create a working marsh and working riparian connection with Tennessee Hollow. The No Action Alternative (GMPA 2000) formulated for analysis in the Draft EIS includes these elements. Other scoping comments suggested keeping the Commissary and PX (without expansion or new construction) if needed for financial reasons, and other EIS alternatives incorporate this suggestion.

The No Action Alternative (GMPA 2000), consistent with the 1994 GMPA and scoping commentors' request, assumes that the Commissary and PX would be demolished to allow for marsh expansion into this area. In the Draft Plan Alternative, a commitment to study the feasibility and scope of marsh expansion into Area B, in part or in whole, as discussed in the No Action Alternative (GMPA 2000), was made. Under the Resource Consolidation Alternative, the treatment for marsh expansion was similar to the No Action Alternative (GMPA 2000). Treatment of marsh expansion under the Sustainable Community and Cultural Destination Alternatives was the same as under the Draft Plan Alternative. Under the Minimum Management Alternative, no expansion of the marsh was assumed.

Since the release of the Draft Plan and Draft EIS, the Presidio Trust, the NPS, and the GGNPA have entered into an agreement to undertake a technical study to identify a broad array of options to ensure the long-term health of the marsh, and to set forth the benefits, costs, impacts, and trade-offs associated with each option. In addition, for the next two years (the estimated duration of the study), the Trust will not undertake any new construction or long-term leasing in the immediate study area. This information is now included in the Final EIS as a common feature to all of the alternatives, except for Minimum Management. The Presidio Trust is committed to the long-term ecological health of the marsh, and this is stated clearly in both the Final Plan and EIS. A copy of the Letter of Agreement is included as Appendix C of the Final Plan. See Response BR-3 and BR-4.

Native Plants – Some scoping commentors asked that their requested “Revised GMPA Alternative” restore native plants in any area scheduled for demolition. The No Action Alternative (GMPA 2000) formulated for analysis in the Draft EIS includes this element through the Vegetation Management Plan (VMP), a plan called for by the 1994 GMPA and developed in partnership by the NPS and the Trust.

For all of the alternatives, vegetation resources would be enhanced in accordance with the approved VMP, which divides the Presidio into three vegetation management zones: native plant communities, forest, and landscape vegetation. The VMP provides a management framework and defines management actions for the revitalization of each of the three landscape types. See Draft EIS, Section 3.3.1 Affected Environment, Biological Resources. This means that for areas where building demolition is proposed, the site restoration for that particular area would follow the guidance of the VMP for that particular vegetation management zone as well as the planning guidelines for that particular planning district. Not all sites where building demolition may occur in the future are necessarily ideal candidates for native plant restoration. As an example, the removal of a non-historic building in the middle of a cluster of historic buildings might allow for the restoration of a historic setting, and the landscape for that setting might not necessarily be native plants. However, in other areas, such as the South Hills planning district where Wherry Housing is proposed for removal in all of

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the alternatives except Minimum Management, the major impetus for building removal is to restore native plant habitat.

The EIS alternatives present a range of options for building demolition and increases in native plant restoration. Site-specific restoration treatments would be determined on a case-by-case basis, consistent with the VMP and the planning guidelines contained in the Final Plan. See Response BR-1.

Open Space – Some scoping commentors asked that their requested “Revised GMPA Alternative” maximize open space. The No Action Alternative (GMPA 2000) formulated for analysis in the Draft EIS includes open space coextensive with what the 1994 GMPA provided, or an increase of about 100 acres. Some comments also ask that the Trust deed all open space/natural areas back to the NPS. For the reasons set forth in Responses OS-5 and FI-12, none of the alternatives includes this element.

Maximizing open space results in inherent trade-offs among different resource values. Maximizing open space suggests removal of historic resources, and demolition of historic structures was constrained under the 1994 GMPA. So as to be as consistent as possible with the 1994 GMPA, the No Action Alternative (GMPA 2000) was not formulated to reflect the maximum open space acres. Rather, the alternatives in the EIS present a range of open space increases that could be accomplished while still meeting other plan objectives. All of the alternatives achieve a net increase in open space over existing conditions. The Resource Consolidation Alternative maximizes the increase in open space (because it assumes the removal of the entirety of the Public Health Service Hospital, including the historic portions), with an increase of about 44 acres more than the No Action Alternative (GMPA 2000). The Sustainable Community Alternative has the smallest increase (besides Minimum Management) at about 75 acres, or 25 percent less than the No Action Alternative (GMPA 2000). The Final Plan Alternative would include roughly the same amount of open space as the No Action Alternative (GMPA 2000). Also see Responses OS-1 through OS-4.

Interpretation Programs – Some scoping commentors asked that their requested “Revised GMPA Alternative” include the concept that the NPS should provide interpretation services for the Presidio under an MOA with the Trust. The No Action Alternative (GMPA 2000) assumes this role for NPS.

The 1996 Presidio Trust Act sets forth the statutory framework for the relationship between the NPS and the Presidio Trust. The NPS is responsible “in cooperation with the Trust for providing public interpretive services, visitor orientation, and educational programs on all lands within the Presidio.” This is stated as one of the common features among all of the alternatives, including the No Action Alternative (GMPA 2000) and the Final Plan Alternative, as is completion of an interpretive plan for the Presidio, jointly prepared by both agencies. The William Penn Mott, Jr. NPS Visitor Center would also continue to be operated as the main visitor orientation and contact point under all of the alternatives. Section 3.4.4 of the EIS provides more detail about the current status of Presidio interpretation and the relationship between the NPS and the Trust regarding implementation of interpretive programs at the Presidio. Also see Response PR-4.

New Construction – Some scoping commentors asked that their requested “Revised GMPA Alternative” keep new construction to an absolute minimum, and preclude creating any new “visitor-magnets.” As requested by scoping commentors, the No Action Alternative (GMPA 2000) assumes a minimal amount of new construction (a total of up to 170,000 square feet), and derives its assumption from the extent of new construction allowed under the 1994 GMPA. See Response AL-2.

The other alternatives in the Draft EIS present a range for levels of new construction. The Minimum Management Alternative assumes no new construction, similar to the Final Plan Variant included in the EIS at the request of commentors on the Draft EIS. See Response AL-5. The maximum level of new construction allowed, a total of 1,370,000 square feet, is evaluated as part of the Cultural Destination Alternative.

Crissy Field – Some scoping commentors asked that their requested “Revised GMPA Alternative” allow no new construction at Crissy Field and specifically none between Crissy Field and Doyle Drive. The No Action Alternative (GMPA 2000) formulated for analysis in the Draft EIS includes this assumption at a level of analysis consistent with the programmatic nature of the alternatives and EIS, calling for a net decrease in building space (from 610,000 square feet to 390,000 square feet) at Crissy Field (Area B), and, like

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the Minimum Management Alternative, evaluates no new construction within the Crissy Field planning district.

Other alternatives capture the range on this issue. Under the Resource Consolidation Alternative, there would be a net decrease in overall square footage within the Crissy Field district (from 610,00 square feet to 540,000 square feet). However, this does not preclude the possibility that some buildings may be removed and a lesser amount of replacement construction built as long as the cap for the district (540,000 square feet) is retained. Other EIS alternatives would allow various amounts of new construction in the Crissy Field (Area B) planning district, subject to quantitative, qualitative, and procedural constraints. See Responses PG-11, PG-12 and PG-14.

Wherry Housing – Some scoping commentors asked that their requested “Revised GMPA Alternative” retain Wherry Housing (at least until 2012) as long as economically practicable and safe and then demolish the units and return the area to open space. The No Action Alternative (GMPA 2000) formulated for analysis in the Draft EIS includes this assumption. This concept came directly from the 1994 GMPA. The scoping Alternative A assumed demolition of Wherry Housing by 2004 when the Army no longer occupied the Presidio. Consistent with the scoping commentors’ requests, under the No Action Alternative (GMPA 2000), Wherry Housing would be retained for use throughout the GMPA planning period (i.e., until about 2010) and demolished entirely by 2013. This timing assumption for the No Action Alternative (GMPA 2000) is consistent with the 1994 GMPA, which called for the housing to be removed at the end of the 1994 GMPA planning horizon. See Response EP-14.

All of the alternatives presented in the EIS (except Minimum Management) assumed the demolition of Wherry Housing and the restoration of open space and natural habitat in this area. Other alternatives call for removal of Wherry Housing over a 20 to 30 year period. See Response HO-12.

East and West Washington Housing – Some scoping commentors asked that their requested “Revised GMPA Alternative” retain and use the housing units at East and West Washington within the South Hills planning district until their useful life is over (sometime after 2020), and rehabilitate and reconfigure

them if necessary for reuse. The No Action Alternative (GMPA 2000) formulated for analysis in the Draft EIS includes this assumption.

The other alternatives presented in the Draft EIS present an array of treatment options for the East and West Washington housing, including full demolition, partial demolition, retention and conversion into smaller units, and retention and reuse.

The No Action Alternative (GMPA 2000) and Minimum Management Alternative assume the retention and reuse of all of these units; no conversions or reconfigurations are assumed. The Final Plan Alternative assumes the removal of some of the units to achieve open space and natural resource enhancement goals, and the rehabilitation and reconfiguration of remaining units to meet projected housing needs. The Sustainable Community Alternative assumes the retention, and potential conversion, of these units. The Resource Consolidation and Cultural Destination Alternatives assume the removal of all of these housing units to achieve open space and natural habitat restoration goals. See Response HO-13.

Infill – Some scoping commentors asked that their requested “Revised GMPA Alternative” identify areas for potential infill construction. Because PTMP is a general policy document and the EIS is a programmatic level document, none of the alternatives includes specific sites for new construction, as recommended by the commentor.

Rather, specific sites for new construction would be determined in the future through the course of implementation and be subject to further public input and environmental review. Nonetheless, for those alternatives that include the potential for new construction, the following policy parameters were included in and analyzed as part of all PTMP alternatives. They would guide the decision-making process for new construction and permit a general assessment of potential impacts:

- New construction would be allowed only to replace building space that is removed, and would occur only in existing areas of development, consistent with stipulations set forth in the Presidio Trust Act.

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- New construction would be designed and sited to be compatible with the historic setting and would be limited to structures of similar size to existing buildings.
- The planning principles and the planning district guidelines set forth the framework for any potential new construction and provide a means to minimize adverse effects upon the NHLD by stipulating that the mass, scale, style, and color of new construction be compatible with the historic setting of the Presidio.
- New construction would be subject to additional analysis and public review prior to implementation, and would be subject to further review under Section 106 of the NHPA, which includes consultation with the SHPO, ACHP, and NPS as stipulated in the Programmatic Agreement.
- The analysis of each alternative assumed a maximum amount of new construction for each planning district. A net difference between existing and future maximum total square footage was given and analyzed.

See also Responses NC-7 and HO-10.

Historic Buildings – Some scoping commentors asked that their requested “Revised GMPA Alternative” rehabilitate and reuse historic buildings to the maximum extent possible/feasible. The No Action Alternative (GMPA 2000) formulated for analysis in the Draft EIS includes this assumption.

With the exception of the Resource Consolidation Alternative, all of the alternatives contained in the Draft EIS do assume that historic buildings would be rehabilitated and reused to the maximum extent feasible. The Resource Consolidation Alternative calls for the demolition, rather than the rehabilitation, of the historic PHSB complex in the southern part of the Presidio. The analysis in the EIS reflects this and has been clarified to indicate that this alternative would adversely affect the NHLD.

All but the Resource Consolidation Alternative in the EIS would protect and preserve the character and integrity of the NHLD. In order to accomplish this objective, historic building rehabilitation would be a critical component of any alternative. Also see Responses HR-1 and HR-5.

PHSB – Some scoping commentors asked that their requested “Revised GMPA Alternative” provide that the Public Health Service Hospital be retained and only the non-historic wings to be demolished.

The No Action Alternative (GMPA 2000) analyzes this specific proposal for the PHSB hospital building. This is consistent with the concept presented in the 1994 GMPA prepared by the NPS. The non-historic addition of the former hospital would be removed to allow restoration of the façade of the historic hospital and reuse of the building.

Other alternatives consider alternate treatments of the PHSB. The Final Plan, Sustainable Community, and Cultural Destination Alternatives also allow for the possibility of (but do not commit to) the removal of the non-historic wings of the former hospital and would allow for replacement construction of that square footage elsewhere within the district. See also to Response PG-5.

Transit and Transportation – Some scoping commentors asked that their requested “Revised GMPA Alternative” make the Presidio a model for urban park transportation planning, and establish a working and reliable system for public transit to and within the Presidio. The No Action Alternative (GMPA 2000) and all other alternatives in the EIS are consistent with concepts contained in the 1994 GMPA with regard to the Presidio becoming a model of sustainability with an environmentally responsible transportation strategy. The No Action Alternative (GMPA 2000) assumes that TDM programs would be provided by park tenants as described in the 1994 GMPA. See Response TN-1.

Parking Garages – Some scoping commentors asked that their requested “Revised GMPA Alternative” no construction of underground parking garages. None of the alternatives in the EIS include any proposals for construction of underground parking. See Response PK-8.

Tenant Selection – Some scoping commentors asked that their requested “Revised GMPA Alternative” carry forward the concept of “park partners” that was integral to the original GMPA. They also ask that the Trust give preference to tenants who have mission-related or public-benefit business purpose, and use rent subsidies to attract mission-related tenants. The No Action Alternative (GMPA 2000) formulated for analysis in the Draft EIS

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carries forward the concepts presented in the 1994 GMPA with regard to tenant selection and a preference for mission-related tenants. “Tenants and residents would work together to create a global center dedicated to addressing the world’s critical environmental, social, and cultural challenges.” This alternative does not directly use the concept of rent subsidies to attract mission-related tenants, as the Trust is required to seek market-based rents for its leaseable space. Rather, the financial model assumed that a certain amount of square footage would be set at a reduced rent level, equivalent to Class C office space typically occupied by non-profit organizations. More than half of the office space would be dedicated to program-based tenants and leased at rental rates assumed for cultural/educational tenants. Also see Responses TS-1 through TS-9.

Environmental Remediation – Some scoping commentors asked that their requested “Revised GMPA Alternative” specify that the \$100 million available for hazardous waste remediation be used for that purpose, rather than for asbestos abatement; include excavation and removal of Landfill E as the highest priority use of remediation funds; and also make Landfill 10 a priority. See Response LU-5.

The environmental remediation program is a separate, ongoing project assumed for all alternatives. Remediation of hazardous substances, pollutants, and contaminants at the Presidio would occur in accordance with the Environmental Remediation Agreement developed among the Trust, NPS, and Army, well before the start of the PTMP process. Specific remedial action plans will address site-specific cleanup issues outside of the PTMP NEPA process, including appropriate remedies and priorities.

Administrative and Operating Expenses, Financing, Competitive Bidding, and Utilities – Some scoping commentors asked that their requested “Revised GMPA Alternative” include other financial and administrative elements. The financial elements, including operating and administrative expenses and third-party financing were fully captured in the analysis of the Draft EIS alternatives by using a planning financial model that was consistently applied across all alternatives to compare their relative revenue generating potential. The model applied consistent assumptions about costs and revenue inputs to generate meaningful comparison of the alternatives. Other requested elements,

such as competitive bidding, contracting requirements, and tax credits fell outside the programmatic nature of the EIS analysis and were not, therefore, included in the components of any of the Draft EIS alternatives.

As outlined above, the No Action Alternative (GMPA 2000) adequately captured every element requested by scoping commentors in a manner identical or close to what was requested in their “Revised GMPA Alternative.” Furthermore, the Trust has fully captured all requested elements within the range of alternatives analyzed in the Draft EIS and so has met its obligations to consider a reasonable range of alternatives. See also Response EP-6.

AL-5. Consider the Sierra Club Alternative or Alternative Closely Modeled on It

A number of commentors request that the Trust evaluate an alternative that they feel was not considered in the Draft EIS, and that would provide a “clear contrast” to the Draft Plan. Typically, the concepts are outlined and/or further refined in their comment letters and include “no new construction” or keeping construction to an absolute minimum, selecting tenants to enhance the GMPA’s mission, providing minimal Trust programming, limiting housing to Presidio-based employees and maximizing the amount of housing by subdividing larger units, restoring Crissy Marsh and Tennessee Hollow, and demolishing East and West Washington housing units at the end of their useful life. Some of the concepts noted also call for deeding back open space to the NPS, prohibiting underground parking, minimizing demolition, reducing operating expenses and capital costs, and abandoning the 23-acre Letterman site project as a digital arts campus. Commentors also refer to a specific and detailed proposal developed by the Sierra Club and included in its comment letter, and ask that this proposal, or one closely modeled on it be evaluated in the EIS.

Response AL-5 – The Trust believes that the concepts of the Sierra Club proposal have already been evaluated as part of other alternatives analyzed in the Draft EIS. In response to the requests made by the Sierra Club and other organizations upon their review of the Draft Plan, however, the Trust has included and evaluated in the Final EIS, the detailed proposal presented by these organizations as their preferred plan option. To ensure that the Trust

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analyzed what the Sierra Club intended as its plan, Trust staff met with a designated Sierra Club representative to clarify the proposal, and reconciled apparent ambiguities and inconsistencies. The result of this consultation and reconciliation is the Final Plan Variant described in Section 2.1.1 through 2.1.9 of the Final EIS.

The land use concepts of the Sierra Club proposal did not differ markedly from those of the Draft Plan (or from what is now the Final Plan Alternative), with a few key exceptions discussed below. In fact, although the Club referred to its proposal as “the GMPA Revised Plan,” the proposal had more land use similarities to the Trust’s Final Plan Alternative than it had to the No Action Alternative (GMPA 2000).² There were only three key land use concepts that differed in marked degree between the Sierra Club’s proposal and the Trust’s Final Plan Alternative. First, the Sierra Club proposal called for a more aggressive program of building demolition. In addition to removing all of the square footage called for in the Final Plan Alternative (i.e., non-historic housing units at Wherry, MacArthur, and Quarry), the Club’s proposal would demolish an additional 200,000 square feet of building space comprised of all the buildings identified for demolition in the GMPA, which included the Commissary building at Crissy Field (Area B) in addition to historic warehouses at the east end of Mason Street.

The second key land use difference relates to replacement construction. Under the Club’s proposal, 1.3 million square feet of existing buildings would be demolished and not replaced, whereas under the Trust’s Final Plan Alternative, up to 710,000 square feet of the 1.1 million square feet identified for demolition could be replaced, some (up to about 400,000 square feet) to meet housing needs and some (up to about 300,000 square feet) to provide building additions or annexes to facilitate reuse of historic or other structures for non-residential use or to meet other plan goals. Thus, as in the Final Plan Alternative, housing units removed in other parts of the park would be replaced through subdivision and conversion of existing building space, but the possibility of obtaining any replacement units through new construction or

² The Sierra Club’s “GMPA Revised Plan” proposal is included in the Final EIS and is referred to as the Final Plan Variant.

modifying existing space by adding square footage is foreclosed in the Final Plan Variant.³

The third key land use difference between the Trust’s Final Plan Alternative and the Sierra Club proposal relates to the relative allocation of office uses versus public cultural/educational uses. In the Sierra Club proposal, there would be less cultural/educational building use (660,000 square feet or 14 percent) and proportionately more office use (1.9 million square feet or 40 percent) in comparison to the Final Plan Alternative (920,000 square feet, or 17 percent cultural/educational and 1.82 million square feet or 32 percent office).

These differences in land use also reflect the different policy and management choices between the Sierra Club proposal and Final Plan Alternative related to the overall Presidio vision, tenant selection priorities, and park programming. The Sierra Club proposal encompasses the vision, tenant selection, and programming policy concepts of the No Action Alternative (GMPA 2000), whereas the Final Plan Alternative encompasses the Trust’s approach to those management decisions proposed in the Draft Plan as now modified in the Final Plan in response to public comments.

With these key land use and policy differences identified, the Trust was able to analyze the Sierra Club proposal (i.e., the Final Plan Variant) at a comparable level of analysis to the Final Plan Alternative (and all other alternatives). Although many of the Sierra Club’s concepts are also included in other alternatives, this approach of constituting the Sierra Club proposal as a variation on the Final Plan Alternative allows an easy and effective side-by-side comparison of the effects of key land use and policy choices between the

³ The Sierra Club’s comment letter, while calling for an alternative with “no new construction,” also suggested minimal square footage additions to residential buildings if needed to facilitate the division of large units into smaller ones. The Trust chose to reconcile this inconsistency by adhering to the Club’s repeated call in the comment letter for no new construction in the Final Plan Variant (just as in the Minimum Management Alternative) because other commentors also requested consideration of such an alternative.

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proposal preferred by the Sierra Club and others and the Plan proposed by the Trust.

The inclusion of the Final Plan Variant also satisfies the request of those other commentors who asked the Trust to review a “No New Construction” alternative, defined as “no construction of new buildings, no underground construction, and no expansion of existing buildings – either vertically, horizontally, or underground.” The Draft EIS already considered this alternative as the Minimum Management Alternative, but with the addition of the analysis of the Final Plan Variant, these commentors’ requests have been more fully addressed. See Response AL-6 below for further discussion.

AL-6. Consider a Minimum Development Alternative

Several commentors assert that the Draft EIS does not include a minimum development plan and that the only alternative with no construction (the Minimum Management Alternative) is insufficient because it is inconsistent with the GMPA and Trust goals.

Response AL-6 – The Trust disagrees with commentors’ assertion that the Draft EIS did not include alternatives to evaluate the effects of a “minimal development” plan. In fact, all EIS alternatives could be considered “minimal development” alternatives in the sense that all propose increasing open space in the Presidio and none propose increasing the amount of building space in the Presidio. If the commentors definition of “minimal development” is construed as a reference to the possibility of replacement construction within the constraints of less overall building square footage, the Draft EIS included two alternatives with “minimal” new construction. First, a minimal construction plan was proffered and evaluated in the form of the Minimum Management Alternative. Under this option, there would be little physical change to the Presidio beyond that already underway, no building construction or building removal, and park enhancements would be limited to those needed to meet the Trust Act’s legal requirements and other basic legal code requirements. This alternative may not have been the “minimum development” plan that some commentors would have preferred, but it is an alternative that included the concept of no new construction as commentors requested during the scoping period.

To ensure a full range of alternatives, the Draft EIS also evaluated a second form of “minimum development” plan, the No Action Alternative (GMPA 2000). This alternative conforms to the 1994 GMPA as closely as possible taking into account present-day changes and updates. This alternative proposed “minimal development” from a different point of view than the Minimum Management Alternative, that is by reducing the total existing square footage by a larger amount than any other alternative and by proposing little possible replacement construction (170,000 square feet), based on the 1994 GMPA. While the Minimum Management Alternative is not entirely consistent with the GMPA goals, as the commentors who raised this concern noted, the No Action Alternative (GMPA 2000) encompasses the GMPA goals and is therefore a representation of “minimal development” along the lines requested.

The commentors are apparently concerned that the small amount of new construction allowed by the No Action Alternative (GMPA 2000) taints the “minimal development” concept of the alternative. The Trust disagrees. Even the 1994 GMPA, which is held out by many commentors as the appropriate paradigm, allowed some new construction as a management tool in an historic district. In fact, the 1994 GMPA permitted a total of about 220,000 square feet of new construction over time, 170,000 square feet before 2000. The Trust’s No Action Alternative (GMPA 2000) is true to the “minimal development” concept in that it assumed new construction only up to the lower end allowed by the 1994 GMPA.

In further response to commentors’ requests on this point, the Trust has now also included the Sierra Club proposal, which can be characterized as yet a third form of “minimal development” plan. It would demolish more space than even the No Action Alternative (GMPA 2000) and, like the Minimum Management Alternative, allow no new construction whatsoever.

NEPA does not require that the Trust evaluate every conceivable alternative, only a reasonable range of alternatives. Having analyzed and considered all three of the options described above, the Trust believes that it has fully and adequately addressed commentors’ requests to evaluate the “minimal development” concept.

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AL-7. Consider a Minimal Effects Alternative

The NPS, CCSF, and others assert that the alternatives analyzed in the Draft EIS have similar impacts. They state that the Trust should modify an alternative to provide a lower potential for effect than those proposed (“one that avoids significant adverse impacts to key resources and the visitor experience”), either similar to or less than the No Action Alternative (GMPA 2000).

Response AL-7 – It is difficult to assess what commentors seek in requesting a “minimal effects” alternative. The request appears to ask the Trust to predetermine the conclusion about environmental effects, and the environmental effects of an alternative cannot be known or predetermined without actually completing the NEPA environmental analysis. The Trust has already captured within the existing range of alternatives those with the potential for “minimal” environmental effects. In reality, there is no such alternative that would have “minimal effects” across the board.

For example, even if the Trust were to create and analyze an alternative that provides for a smaller amount of building square footage than the No Action Alternative (GMPA 2000), at some point – even under the Sierra Club proposal – building demolition in the historic district would include historic structures and would therefore result in adverse impacts on individual historic buildings and eventually impair the integrity of the NHLD.

So even though commentors may believe intuitively that the lowest level of building space at the Presidio will result in the lowest level of effect, that may not be the case. There are so many different and sometimes competing resource values within the Presidio that the result of any given mix of characteristics cannot necessarily be assumed. The alternatives already vary in all the important ways that would likely cause changes in environmental effects, such as the amount and type of open space, total building square footage, level of potential demolition, level of potential new replacement construction, level of resource enhancement, and retention or loss of dwelling units, among others. Some of the alternatives have lesser effects in some areas of analysis than others. In this way, the Trust has created a reasonable array of alternatives that reflect a reasonable range of results across the many different and competing planning variables.

AL-8. Consider Other Alternatives

One individual asks whether the Trust could examine a number of alternatives, including a 1994 Final GMPA Alternative, a GMPA 2000 without LDAC Project Alternative, a GMPA 2000 with LDAC Project Alternative, a Draft Plan without LDAC Project/New Construction/Building Expansion Alternative, a Maximum Non-Historic Planned Demolition plus No New Construction Alternative, and a No New Construction Outside of Existing Structures without LDAC Project and with Maximum Non-Historic Planned Demolition and with Rehabilitation of Remaining Buildings to Meet Federal Code Requirements Alternative. Another individual urges the Trust to consider a Cultural Destination through Adaptive Reuse Alternative that would emphasize “the same museum and cultural uses identified in Alternative D but would accommodate those uses exclusively through the adaptive reuse of existing structures.” Another individual suggests “some sort of slower evolving, hybrid alternative” should be pursued over a longer timeframe and with a more gradual funding of programs.

Response AL-8 – All of the alternatives mentioned by commentors have been fully examined, either as part of previous planning and NEPA review documents prepared by the Trust or others or as part of the PTMP planning and environmental review process.

1. 1994 Final GMPA Alternative: The 1994 Final GMPA alternative was fully examined along with other alternatives by the NPS in the Final General Management Plan Amendment Environmental Impact Statement (July 1994). The PTMP Final EIS tiers from the GMPA EIS, and the No Action Alternative (GMPA 2000) in the PTMP Final EIS is the 1994 GMPA alternative updated to reflect current site conditions that have changed since the NPS finalized the GMPA eight years ago. Refer also to Responses EP-14 and EP-2.
2. GMPA 2000 without LDAC Project Alternative: The LDAC project has been the subject of its own planning process and environmental impact statement, and the PTMP EIS tiers from the Letterman Complex Final EIS. See Response EP-16. An important basis for finalizing that project and moving forward with its implementation was the substantial contribution it makes to financial self-sufficiency. In response to this and

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other comments that suggest that the LDAC project is unnecessary and undesirable, the Trust evaluated the financial implications of excluding the LDAC project from PTMP alternatives, including the No Action Alternative (GMPA 2000). The financial sensitivity analysis revealed that without LDAC revenues, the No Action Alternative (GMPA 2000) would not be financially self-sufficient or financially sustainable, and therefore this possibility was considered unreasonable and eliminated from further consideration as it fails to meet the threshold financial mandate of the Trust Act. Refer also to Response FI-28.

3. GMPA 2000 with LDAC Project Alternative: The PTMP EIS includes a full analysis of the No Action Alternative (GMPA 2000), which includes all aspects of the LDAC project within its baseline assumptions. Refer also to Responses EP-19 and EP-20.
4. Draft Plan without LDAC Project/New Construction/Building Expansion Alternative: As set forth in Responses EP-16 and EP-18, the Letterman Complex project is final. On the basis of its own Final EIS and Record of Decision, implementation of the project has begun. It is unnecessary and unreasonable to assume anything other than the inclusion of the LDAC project. In response to this and other comments, the Trust analyzed the Final Plan Alternative assuming no LDAC project. The result is a plan that is marginally financially viable. Refer to Response FI-28 for more discussion.
5. No New Construction Alternatives: The Trust has fully satisfied commentors' requests for alternatives that assess no new construction or building expansion. In addition to the Minimum Management Alternative, the Final Plan Variant in the EIS demonstrates potential impacts of the Final Plan if it allowed no new construction, including no building additions or expansions, and other policy changes suggested by the Sierra Club and other commentors. See Response AL-5 above. This

Final Plan Variant also fulfills the commentors' request for an alternative that maximizes demolition of non-historic buildings. It retains some non-historic housing, removal of which (without replacement) would make it impossible to meet the competing plan goal stated in the purpose and need for the plan update related to housing Presidio-based employees.

6. Cultural Destination Alternative: The Final Plan Alternative allows for a similar amount of cultural square footage and uses as the Cultural Destination Alternative, but with an emphasis on reusing historic buildings. The Final Plan Alternative does not preclude the possibility of new construction to accommodate this land use, but does not specifically call for new construction to accommodate cultural uses. In response to comments, the Final Plan Alternative has been modified to include a more incremental growth in program funding than originally proposed (i.e. growing from \$2 million to \$5 million annually over an extended period of time rather than \$10 million annually starting within the next few years).

For more information on alternatives, please refer to Responses EP-6, EP-14, and EP-18.