

4.6 GENERAL PLANNING (GP)

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GENERAL

GP-1. *Planning Principles*

Several commentors voice concern about the efficacy and function of the Planning Principles; they assert that the principles are too general and open-ended, and should be enforceable as goals and agency commitments for resource protection so that the public can assess whether the Trust is meeting the goals. The NPS requests that the function of the community assurances be explained and that they, together with the Planning Principles and District Guidelines, be adopted as enforceable mitigations. Some commentors suggest that the principles should continue to come from the 1994 GMPA.

Response GP-1 – The substance and much of the text of the Planning Principles originally presented in Chapter Two of the Draft Plan have been retained and moved into Chapter One of the Final Plan. They have been edited for clarity and shortened into a total of 15 planning principles organized into

the subject areas of Cultural, Natural, Scenic and Recreational Resources, and Visitor Experience. These principles will guide future actions and decisions by the Trust to ensure the preservation, protection, and enhancement of significant park resources, goals that are consistent with the mission of the Trust as provided in the Presidio Trust Act. The Final Plan also includes explanatory text for each of the planning principles and describes specific examples of actions and programs that demonstrate the implementation of each principle.

The Draft Plan included planning principles in the subject areas of Community, Transportation, Infrastructure and Facilities Maintenance, and Financial Sustainability. These topics have been reorganized in the Final Plan, and the Draft Plan planning principles on these topics have been retained but incorporated into Chapter Two: Park Land Uses, Transportation, and Infrastructure; this chapter expresses the Trust's plan and proposed actions for resident and visitor amenities, housing, access and circulation, infrastructure and maintenance programs. The former Draft Plan planning principles for Financial Sustainability are incorporated within the concepts presented in Chapter Four: Plan Implementation of the Final Plan.

In response to public comment, the planning principles express general policies and goals of the Trust to ensure the long-term protection and preservation of the Presidio's park resources. These goals are necessarily somewhat general because they must guide a wide variety of activities that will be implemented over time. They cannot be read as absolute, enforceable standards because they reflect the many important Presidio resource values that must be protected in balance with one another. In some instances, principles may overlap, come into conflict, or compete for precedence. As the Final Plan explains, "Should principles come into conflict, care will be taken to balance competing values, and to seek overall conformance to the policy framework established by this Plan. The Plan is not intended to be prescriptive; it is meant, instead, to provide parameters and goals that can inform future site-specific plans and program implementation."

As implementation proceeds, the Trust will review projects for consistency with the diverse policy goals in the planning principles. The public will also be able to review and assure that the Trust is meeting these goals in an

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appropriate balance through the many public participation opportunities that will accompany the Trust's future planning and implementation projects, both large and small. See Figure 4.3 of the Final Plan.

The Trust can assure commentors, in response to their suggestions, that the planning principles were derived directly from the 1994 GMPA. In some instances, they have been modified or newly written to address Trust management approaches or Trust Act mandates. The planning principles were first presented by the Trust as part of the public scoping for the Draft Plan, and included documentation about their origin (from the GMPA, modified from GMPA, or entirely new). These draft principles were then modified based upon public scoping, and included in the Draft Plan. The principles as they are presented in the Final Plan reflect a refinement based upon additional public input received during the review of the Draft Plan. Some commentors said the principles were too vague; the principles have been edited and shortened for clarity in response to these comments.

The "Community Assurances" presented in the Draft Plan were a summary of proposed plan actions and objectives. As commentors point out, they created confusion about their function and are therefore no longer called out as separate "Community Assurances," but are presented as a summary of plan highlights and goals in the Overview section of the Final Plan.

GP-2. *Balancing Principles*

The NRDC and the NPS request that the Trust's mandate to protect the Presidio's resources while minimizing costs to the federal government should be clearly articulated in the planning principles and implementation program. In addition, commentors request clarification of how potentially conflicting or competing principles would be balanced in the decision-making process.

Response GP-2 – In response to comments, the Final Plan has strengthened text to emphasize the Trust's mandate, first and foremost, to protect and preserve the Presidio's valuable park resources. This mandate is the guiding principle of the Final Plan, and both the Overview and Chapter One of the Final Plan clearly state so. Text has also been revised to better articulate the Trust's mandate to achieve this goal of park preservation while also generating sufficient revenues by 2013, and beyond, to support operations and

maintenance, capital needs, and capital reserves for Area B of the Presidio. In both the Overview and Chapter Four, however, the Final Plan is very clear that reaching a break-even point by 2013 does not equate to achieving the underlying financial base that is needed to ensure the continuing preservation, rehabilitation, and maintenance of the Presidio's historic buildings, landscapes, and natural resources. The Trust's financial requirement cannot be understood apart from the mandate to preserve and protect the park for the long-term. In fact, the PTMP states that the Trust's success will be measured largely by the timely rehabilitation and reuse of the Presidio's historic buildings and landscapes, the quality and quantity of open spaces created and enhanced, and the extent to which the park resources are understood and enjoyed by the public.

Chapter One of the Final Plan includes language addressing the balancing of potentially competing or conflicting planning principles. The planning principles are interrelated and taken together will guide future actions and decision-making by the Trust. However, should conflicts arise through the implementation of site-specific actions, the Trust will strive to balance competing values and seek overall conformance to the policy framework set forth in the Final Plan. When such issues arise, the Trust anticipates conducting additional research, planning, and analysis, and offering opportunities for public input as part of the implementation process. Also refer to Chapter Four of the Final Plan and Response GP-1.

GP-3. *Plan's Timeframe/Future Changes to the Plan*

Some commentors recommend that the PTMP not cover a 20-year timeframe, but a lesser timeframe. ("[I]s unreasonable when compared to the practices of other federal land management agencies.") The concern is that the Plan will most likely need to be changed during the next 20 years, and this should be acknowledged.

Response GP-3 – It is both common and necessary in a planning and environmental review context to set a reasonable assumption concerning the expected timeframe for "build-out" of a project or program. At a minimum, the assumption serves to set parameters needed for the impacts analysis. There is no legal or fixed standard required for establishing the build-out timeframe assumption. It is a matter of judgment and is specific to each project, plan, or

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program. In this instance, the Trust assumed a 20-year build-out period. This assumption is reasonable given the large number and scope of resource improvement projects to be completed to meet the resource protection mandates of the Trust Act. Furthermore, early work with the financial model suggested that cash flow constraints would not allow the Trust to complete all of the necessary preservation and resource capital improvement projects by 2013 (i.e., within roughly 10-12 years), and that assuming a longer period would therefore be more reasonable for financial modeling purposes. For consistency, this modeling assumption was therefore carried through to the impacts analyses topics and also to the Plan itself.

The planning timeframe assumed does not mean the Plan is immutable for the selected period. Changes are determined by need and circumstance, and here too the Plan can and will be changed to address eventualities that arise over time. The very nature of the Plan, including some of its land use flexibility that was not allowed under the 1994 GMPA, was designed with this in mind. The PTMP is a general policy framework for the Trust's management of Area B of the Presidio. As such, it is a blueprint for the future. The programmatic nature of the Plan necessitates that more specific planning be undertaken in the future and that further public input and environmental analysis be completed before many implementation decisions are made. Future implementation activities will build on the PTMP and will address individual sites, planning districts, or areas of the Presidio at a greater level of specificity than is included in PTMP. Amendments to the Plan will be made and adopted by the Board following further planning and environmental review activity and will be subject to public input as required by NEPA and NHPA (refer to Chapter Four of the Final Plan for more details about the types of near-term and long-term implementation actions proposed, the role of public involvement in implementation decisions, and the process for amending and monitoring the Plan.)

GP-4. Role of NPS in Implementation

Two commentors suggest that the PTMP acknowledge the responsibilities of the NPS under the Trust Act and clarify the cooperative effort between the NPS and the Trust relating to these responsibilities. One of the commentors recommends that the NPS provide oversight on all Presidio planning, tenant

selection, and programs. Several individuals also remark that the Trust and the NPS are not working as a team. They comment that the relationship between the NPS and the Trust is unclear in the PTIP and the EIS.

Response GP-4 – The PTMP includes text in the Overview, Chapter Four, and Appendix B: Plan Background, that explains the relationship between the Presidio Trust and the NPS. The Presidio Trust Act sets forth the statutory framework for the relationship between the NPS and the Trust. As authorized by Congress, the NPS has jurisdiction over and manages Area A of the Presidio. NPS is responsible “in cooperation with the Trust for providing public interpretive services, visitor orientation, and educational programs on all lands within the Presidio.” Beyond this role, the two agencies share the goal of seamless operation and management of the Presidio, cooperate on several joint planning initiatives, and collaborate on natural resources activities, special events and festivals, programs, public safety, and transportation, circulation, and parking issues. In addition, the two agencies have been working together on a Presidio Interpretive Plan for all of the Presidio that will guide interpretive programming and lay the foundation for an effective partnership among the Trust, the NPS, and others for interpretive programs and services.

Plan provisions for coordination with and oversight by the NPS emphasize those areas well-suited to NPS expertise and recognize NPS staffing resource constraints. The NPS role and services it provides with respect to interpretation, visitor orientation, and education are a “floor,” not “a ceiling”. NPS resources are limited, and the Trust may be able to provide funding and program support to complement the sub-set of Presidio programs provided by the NPS. It is both unrealistic and inefficient to have the NPS oversee all Trust program-related activities. The cooperative efforts between the agencies will be used to enhance the quality and breadth of public programming, not to duplicate efforts.

The Trust is declining to adopt the commentor's suggestion about NPS oversight of Trust tenant selection/leasing decisions. In the GMPA itself, the NPS noted that managing the Presidio would require skills not typically held by NPS personnel, including property management, leasing, real estate finance, and authorities traditionally beyond the reach of NPS enabling

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statutes (1994 GMPA, page 112). Congress created the Trust, in part, to bring its leasing and tenant selection expertise to bear. This therefore is an area where NPS coordination and oversight would be both unnecessary and inefficient. See also Responses TS-1 through TS-7.

SPECIFIC FACILITIES AND PROGRAMS

GP-5. Park Operations and Museum Collections Facilities

The NPS requests that the PTMP commit to a museum collections facility as well as other operational facility needs in specific buildings for use by both the Trust and the NPS. They note the Trust and NPS have been in ongoing discussions for some time concerning park operational and museum collection facilities needs, and no decisions about the scope of uses, location, or amount of necessary space have been made.

Response GP-5 –The Trust acknowledges that certain facilities are needed to support daily park operations and necessary administrative functions of the Trust and NPS. These operational functions at present include public safety; maintenance; salvage, recycling, and natural resource management including plant nurseries; infrastructure and utilities, such as the water treatment plant and telecommunications facilities; warehouse and storage facilities; and administration. Trust and NPS facilities currently occupy approximately 600,000 square feet. Because these uses do not generate revenue and occupy space that might otherwise be used to serve visitors or the public, every effort will be made to reduce and minimize use of building space for these administrative purposes.

To address park operations needs, the Trust and the NPS are currently collaborating on a Facilities Management Study that will examine current use of space for park operations, identify long-term needs, and assess options for long-term locations with an eye toward overall reduction in occupied space.

Section 2.2.8 of the Final EIS describes the assumptions for all planning alternatives regarding the buildings and facilities necessary for Trust and NPS use for critical park operations. The Final EIS was revised in response to this comment to specifically identify the Presidio Collections Facilities. The EIS

financial analysis assumed that approximately 268,000 square feet of space would be occupied by the Trust and NPS as non-revenue generating space.

The decision-making framework for museum collections facilities needs is set out in the Final Plan, Planning Principle 5, under Collection Management. Text explaining this principle acknowledges the current Park Archives and Records Center in Presidio Building 667 and commits to the continuing function, though the location and scale may change in the future. The Trust agrees with the NPS that the agencies must comply with the federal collections requirements in 36 CFR Part 79; these regulations do not require the Trust to identify the size, physical requirements, or location of such a facility in the PTMP, however. The Trust will cooperate with the NPS to study the need for, feasibility, and location of an enhanced park-wide collection management facility, and has taken the first step by including this assessment within the Facilities Management Study currently underway.

GP-6. Trails

BCDC requests that the Final Plan include figures depicting both existing and proposed trails and that the Trust provide more locations for additional pedestrian and bicycle linkages to the shoreline. BCDC also requests that the PTMP include guidance to indicate the types and attributes (e.g., widths, signs, furniture, landscaping, lighting) of trails contemplated for the Presidio.

Response GP-6 – In response to the first request, two new figures have been added to Chapter Two of the Final Plan showing two separate draft trails plan maps, one for pedestrian routes and one for bicycle routes. These figures represent a working draft version of the Trails and Bikeways Master Plan. The NPS and Trust are working cooperatively to prepare a draft Master Plan and corresponding Environmental Assessment that address Presidio-wide trail and bikeway networks. These draft documents will be released for public review and comment later this year. The final trail and bikeway alignments will be determined through the ongoing planning and environmental review process.

Regarding additional pedestrian and bicycle linkages to the shoreline, the draft pedestrian routes map are now included in the Final Plan. As BCDC notes, trail connections between the Main Post and Crissy Field would be provided at the west side of the parade ground (this is proposed as a primary trail route),

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along Halleck Street, and along Tennessee Hollow. Additional linkage from the interior to the shoreline would be provided along McDowell Avenue, where there would be a pedestrian connection to Crissy Field from the stables and Presidio uplands. See Figures 2.7 and 2.8 in the Final Plan.

More detailed information on trails, including approximate widths, signage, and other design parameters, will be made available in the forthcoming Draft Presidio Trails and Bikeways Master Plan. The Draft Master Plan will examine alternatives that include trails for pedestrian, bicycle, and multi-modal trails. While the PTMP is a programmatic document and cannot provide this level of detail, it contains policy guidance consistent with the Draft Presidio Trails and Bikeways Master Plan for providing increased access for park visitors in balance with resource preservation and enhancement objectives.

GP-7. Sustainability

Commentors urge the Trust to commit to sustainability and describe how the Presidio would be a model of environmental sustainability. They ask the Trust to describe more fully the role of stewardship in planning for the Presidio's future.

Response GP-7 – The concepts of preservation, sustainability, and education permeate the Trust's operations and management of Area B of the Presidio and are clearly articulated in the Final Plan. Specifically, please refer to Chapter One's section on Bringing People to the Park, and Chapter Two's sections on Cultural and Educational Uses, Transportation, and Infrastructure and Facilities, which give specific examples in these subject areas. The Plan describes both current and proposed programs and practices, the concepts for which come from the 1994 GMPA. Examples of programs implemented or underway include the development of an on-site water recycling system located within an existing Presidio building to serve Presidio needs, cost-effective energy conservation retrofits of buildings and infrastructure systems, use of clean-fuel shuttle buses, and solid waste reduction programs that include educational and job training components. The PTMP also calls for expansion of current stewardship programs, in collaboration with the NPS and other partners, and outreach to under-served communities. As articulated in the Final Plan, the Trust will continue to build partnerships to increase

participation in sustainability initiatives and is committed to making these programs accessible to as many visitors as possible.

GP-8. Open Space

Commentors suggest that the Trust should place its land use priorities on open space, outdoor recreation, education, and environmental programs. The GGNRA Citizens' Advisory Commission suggests that, where active recreational sites are in conflict with natural area restoration, the recreational site should be relocated if feasible.

Response GP-8 – The Final Plan makes a clear, strong commitment to an increase in open space, as well as to improving open spaces for outdoor activities and play and enhancing existing recreational facilities and play opportunities in balance with resource protection. As described in Chapter Two of the Final Plan, the Trust will increase open space by 99 acres over time, which will afford many more opportunities for natural habitat restoration and increased visitor use and enjoyment. Please refer to text in Chapter One, Scenic and Recreational Resources, about the Trust's proposal to increase and diversify recreational opportunities through the creation of new open space in balance with resource protection.

The Plan makes a commitment for the Trust to retain and improve existing recreational facilities as well as open spaces used for passive recreation. The Trust recognizes that active recreational uses and facilities have the potential to conflict with open space managed for the restoration of natural habitats. Proposals for specific recreational facilities and sites are not included in the Final Plan, as it is a programmatic level document. However, it is anticipated that proposals may be developed to remove or relocate some recreational facilities in the future in conjunction with other planning projects, including environmental remediation plans. The relocation of facilities, including ballfields, would be done in balance with other resource management goals and objectives, and these undertakings would include opportunities for public involvement. Please refer to Chapter One, Planning Principle 10, in the Final Plan.

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GP-9. Providing for the Arts

Several commentors request that the PTMP include more information about potential facilities for the arts and ensure their presence in the Presidio's future.

Response GP-9 – The PTMP is a programmatic level document that sets forth a framework for the Presidio's future management. As such, it does not provide building- or site-specific treatment recommendations. However, the PTMP does include broad categories of building uses, with overall square footages by use and preferences for land uses by planning district. The PTMP

does not exclude the possibility of facilities for the arts as part of the cultural and educational uses described in Chapter Two of the Final Plan. The Final Plan allocates up to 920,000 square feet of space for cultural and educational uses that may include visitor facilities, interpretive sites, performing arts facilities, non-commercial theaters, museums, space for arts and educational organizations, schools, institutes, training facilities, libraries, archives, and classrooms. Many of these uses may not be able to fully fund themselves. Therefore, successful installation of these uses within the Presidio may require financial assistance from other Trust projects or outside funding sources.