

# RESPONSE TO COMMENTS

## 4. Responses to Comments

### 4.7 PLANNING DISTRICT CONCEPTS AND GUIDELINES (PG)

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### **GENERAL**

#### **PG-1. Design Guidelines**

The National Trust for Historic Preservation and others recommend that the Trust commit to specific, detailed and quantifiable design guidelines in its plan (e.g., building height, density, site design, building separation, architectural form and articulation, relationship to historic buildings) for each planning district to provide useful guidance on specific mitigation measures or design and construction specifications and to ensure new construction is compatible with the historic district. One commentator notes that the height limit in the Draft Plan is inconsistent with the assumption used in the Draft EIS and expresses concern that there is a “blanket height limit” in the Draft Plan.

**Response PG-1** – Planning guidelines, developed to reflect and be consistent with the Secretary of the Interior’s Standards for the Rehabilitation of Historic Properties (NPS, 1992) are set forth in Chapter Three of the Final Plan. The planning guidelines will be used to guide future changes and designs within each planning district. These guidelines identify the key character-defining features of each district and provide guidance for preserving, protecting and enhancing these features. For each planning district, a maximum level of potential demolition and new construction is provided, and maximum building heights are also included based upon an understanding of the district’s built character. In response to one commentator who expresses concern that there is a “blanket height limit” in the Draft Plan, each planning district includes specific height limits based upon an understanding of the character-defining features of that district. The inconsistency with the Draft EIS, with regard to building height restrictions, has been remedied and the PTMP planning guidelines would apply to all of the alternatives except the Minimum Management Alternative.

The Trust cannot commit to the preparation of more detailed design guidelines for each planning district, although in many cases, more specific planning will include the preparation of such guidelines. It is difficult to predict the precise scope or content of future planning efforts at this time; some projects (whether at the district level or project-specific) will require the preparation of design guidelines to supplement the planning guidelines included in Chapter Three of

the Final Plan, and some will not. The necessity for detailed design guidelines will be determined on a case by case basis. Any future design guidelines prepared would not include directions for building specifications and construction details, as suggested by one commentator. Design guidelines, sometimes known as “compatibility criteria,” are intended to provide guidance to the designers to ensure that new elements (buildings, landscape features) will be compatible with the historic setting. The planning guidelines provided in the Final Plan are the beginnings of this design direction; more specific site-design criteria and guidance may be developed as part of a specific project proposal. In particular, for new construction proposals, site evaluations will assess building height, site design, building separation, architectural form, and articulation in relation to adjacent historic development patterns. It would be at this point in the design process that specific and quantifiable information and guidance would be provided, as needed to ensure compatibility with the NHLD. Other projects may not require design guidelines; such projects would include historic building and landscape rehabilitation, which will be guided by physical history reports, cultural landscape assessments, and the Secretary’s Standards (for both buildings and historic landscapes).

The PTMP is a programmatic level document and does not specify individual site treatments, including new construction. Rather, it provides a framework and guidance for future decision-making. The Final Plan does commit to a process for both public involvement in compliance with NEPA and NHPA as well as for historic compliance consultation to help ensure protection of the NHLD. Refer to Responses PI-1, PI-2 and PI-10 for additional information on this subject. The Final Plan also states that new construction will only occur in areas of existing development and be sited to minimize impacts on adjacent resources. New construction will be used to reinforce historic character-defining features of an area and its design will ensure that the association, feeling, and setting of the significant elements and the integrity of the NHLD are protected. The public will have opportunities for review and input during the planning process for these types of projects. In response to public comment, Chapter Four of the Final Plan was refined to clarify future opportunities for public participation. In addition, the ACHP, SHPO, NPS and concurring parties to the Programmatic Agreement will also have opportunities for review and consultation on undertakings which could have a significant adverse effect on historic resources. See Final EIS, Appendix D.

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The Guidelines for Rehabilitating Buildings at the Presidio of San Francisco (NPS, 1995), will also be followed.

### **PG-2. *New Construction at Crissy Field and Fort Scott***

The BCDC suggests that the Trust assure the design of newly added square footage at Crissy Field and Fort Scott does not result in visual or physical barriers to the Bay, in adverse impacts on sensitive Bay-related habitats or species or on recreational uses of the Bay shoreline.

**Response PG-2** – Developed acres of the Presidio under Trust jurisdiction (Area B) lie some distance from the shoreline, which remains in NPS jurisdiction. In general, existing (and therefore any potential future) buildings are sited at the top or at the base of coastal bluffs. Site topography, more than any manmade features, tends to dictate access between inland and coastal areas.

The PTMP sets outer bounds on future actions that will involve changes in square footage. No changes are currently contemplated that will increase square footage or result in visual/physical barriers to the Bay, adverse impacts on Bay related habitat or species, or recreational use of the shoreline. In response to comments regarding development at Crissy Field, the Final Plan decreases the maximum amount of potential new construction that will be permitted at Crissy Field by approximately 55,000 square feet as compared to what had been proposed in the Draft Plan. The net future change at Crissy Field will allow only up to 30,000 square feet more than what currently exists. Most of the potential square footage increase at Fort Scott is intended to accommodate replacement of non-historic housing with more compatible and diversified housing. This non-historic housing is located within a single enclave that is visually and physically separated from the rest of the planning district and the Bay.

If and when specific projects are proposed that will increase square footage at either Crissy Field or Fort Scott, they will be subject to further public review and additional environmental analysis. Furthermore, under the Final Plan, any new construction must be consistent with PTMP planning principles for resource conservation and protection as well as the planning guidelines set forth for each district, which are designed in part to avoid visual and physical

barriers to the Bay. Conformance with PTMP planning principles and planning guidelines will ensure that any new square footage would not adversely affect enjoyment of the Bay and its shoreline within Area A or within areas adjacent to the Bay or shoreline (Area B).

### **PG-3. *Use of Quotations from GMPA***

The Neighborhood Association for Presidio Planning asks the Trust to clarify whether the italicized quotations from the 1994 GMPA in the Draft Plan indicate a specific commitment that those portions of the GMPA would be carried out in the future.

**Response PG-3** – The technique of directly quoting in the Draft Plan some, but not other, text from the original GMPA caused confusion among reviewers regarding whether the Trust would follow exactly the 1994 GMPA. In response to this and other comments, the majority of quotations from the GMPA have been deleted in the Final Plan and, instead, the concepts embedded within these quotations have been incorporated into the full body of the Final Plan text, as applicable. This change indicates that, although many of the policy, land use, and planning concepts of the GMPA have been carried forward into the PTMP, the Trust will carry out these concepts consistent with the updated implementation strategies under the Final Plan. Also refer to Response PN-4.

## ***PUBLIC HEALTH SERVICE HOSPITAL DISTRICT***

### **PG-4. *Need for Specificity within the PHSB District***

The Planning Association for the Richmond and one individual request more specificity for the PHSB district. One commentator indicates that the PHSB section is the weakest part of the planning document because there is no specific or credible plan for this district. Because this district is separate from the main Presidio with entrances from a city neighborhood, any plan would need to address these specific issues.

**Response PG-4** – The land use preferences given for each planning district are expressed in terms of a general mix of uses and are long-term goals. In the case of the PHSB district, the Trust has strengthened language in the Final

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Plan to state that the preferred use of the former hospital is residential, with the possibility of educational uses as well. However, as is the case with all of the planning districts, the Trust will seek viable tenants for these preferred uses but implementation will inevitably depend upon the cost of building rehabilitation, the ability to interest potential tenants, and other factors. With regard to access and circulation, the Final Plan indicates that 14<sup>th</sup> and 15<sup>th</sup> Avenues will provide the main vehicular access between the site and the City, with Battery Caulfield Road providing access to the rest of the Presidio. The Trust anticipates that once a proposal is made for reuse of the district, or portions thereof, additional site planning and design would occur. Issues around access and circulation would be further addressed at that time, allowing for public participation.

### **PG-5. Demolition vs. Reuse of the PSHH**

Commentors offer a wide variety of viewpoints concerning the Public Health Service Hospital. The Lake Street Residents Association and various individuals recommend that the Plan call for the demolition of the PSHH building, while the National Trust and others recommend that the PTMP contain a much stronger commitment to retaining historic sections of the PSHH and consider demolition only as a last resort. UCSF notes that a previous engineering study raised doubts about whether the historic portions of the building could be rehabilitated cost-effectively. The Lake Street Residents Association, Neighborhood Associations for Presidio Planning, and others recommend that the PSHH building footprint be reduced in size by removing the building “wings.”

**Response PG-5** – The range of suggestions for the PSHH district, and the PSHH building itself, are reflected in the range of alternatives included in the EIS. One alternative, the Resource Consolidation Alternative, would remove the entire hospital complex, while others would preserve it. Some alternatives would remove the non-historic wings of the hospital building, and others would leave this decision to be resolved by further study. A range of residential, conference, and educational land uses are also assessed.

The Final Plan permits future consideration of a number of different building uses and treatments. Consistent with the Trust’s commitment to preserve and protect the integrity of the NHLD, the Final Plan states that the Trust will first

pursue the rehabilitation and reuse of the historic portions of the former hospital (Building 1801). Future planning may consider removal of the non-historic wings of the main hospital building, which would allow for the rehabilitation of the building’s original façade. Any replacement construction would be carefully sited and designed to be compatible with the cultural landscape. If, however, a suitable tenant cannot be found to rehabilitate the historic hospital, the entire building may be considered for removal; removal of the historic hospital and replacement construction would be considered as part of a separate undertaking. See Chapter Four of the Final Plan. The maximum permitted building area for this district is 400,000 square feet (the amount of currently existing square feet), with the maximum amount of demolition and new construction at 130,000 square feet. As provided in the Final Plan, these are overall caps for the district and the final site plan could consider a reduced building area.

### **PG-6. Housing as Priority Use within the PSHH District**

One neighborhood group states that the potential uses for the PSHH allowed in the Draft Plan are too varied and should be narrowed. Various civic, neighborhood, and environmental organizations, as well as various individuals, recommend that, to avoid impacts on adjacent neighborhoods and to place residents close to neighborhood services and transit, the Final Plan identify housing as the top priority use within the PSHH planning district. UCSF has expressed interest in developing student housing opportunities in the PSHH district, and suggests specifying the number of units that could be developed. Others suggest that if the main building cannot be reconfigured for housing, it could be replaced with some new housing.

**Response PG-6** – In response to suggestions both to narrow potential uses and to identify priority uses, the Final Plan states a preference not previously identified in the Draft Plan for residential uses within the PSHH district, and also allows for educational uses. With regard to the request for reuse as housing, Chapter Two of the PTMP provides more detailed information on the Trust’s goals for housing than what was presented in the Draft Plan. Specifically for the PSHH district, the Final Plan proposes to increase the number of residential accommodations and to convert the historic hospital to residential use, if feasible.

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The Final Plan is also responsive to the suggestion to indicate for the PSHH district (as well as other districts) the number of dwelling units that could be considered. A range of dwelling and dorm units for the PSHH district is provided in Chapter Two, under the Housing section, as follows:

Total existing dwelling/dorm units = 97. (Some are being used for non-residential uses on an interim basis.)

- Dwelling/dorm units to be removed or converted to non-residential use = 0-90
- Dwelling/dorm units to be replaced within existing buildings = 80-200
- Dwelling/dorm units to be replaced within new construction = 0-40
- Maximum number of residences = 200-210

These ranges assume that interim non-residential uses within the nurses dormitories may or may not be perpetuated, and that the number of units provided by converting the hospital building to residential use will require further building-specific studies.

### **PG-7. PSHH Parking Lot and Nike Missile Site**

Various federal and local agencies, civic/neighborhood and environmental organizations, and individuals note an apparent inconsistency between the Draft Plan and the Draft EIS within the PSHH district. The Draft EIS suggests that the Nike Missile site (upper plateau) be used for institutional/residential uses, and the PSHH parking area (upper plateau) be used for landscape vegetation. The Draft Plan, on the other hand, proposes general planning guidelines for enhancing open space on the upper plateau and allowing building or other developed uses on the lower plateau. Several agencies, organizations, and individuals recommend habitat preservation in the PSHH and Nike Missile site areas. A few commentors object to treating the former Nike Missile site as a potential area for developed use.

**Response PG-7** – The land use inconsistency at the PSHH upper plateau parking area identified by commentors has been corrected in the Final Plan

and Final EIS in response to these comments. First, in the Final Plan graphics for the PSHH district, the upper and lower plateaus, as well as the Nike swale, are identified. The Final Plan's district concept states the intent to maintain the historic concentration of development on the lower plateau and enhance open space on the upper plateau. The planning guidelines clarify that the open space below the Nike Missile site will be rehabilitated and restored as native plant habitat. To help clarify this, within the Final Plan's district concept graphic, the parking lot feature north of the PSHH (upper plateau) has been revised to indicate the use of the lot for native plant communities, as shown in Figure 3.6, consistent with the VMP zoning. The text in the Final EIS has been corrected to reflect this change in open space.

It should be noted, however, that there is a cluster of historic buildings at the north end of the planning district above the Nike Swale, and this area is identified and shaded as a generalized area of development. This site has been previously disturbed and developed, and is therefore an appropriate site for future development. Despite a few opposing views, the Final Plan allows for the potential that some replacement construction or other developed use (e.g., playing fields) could be proposed for this area in the future, if sited and designed in a manner compatible with the historic district and so as not to adversely affect the adjacent natural resources. The analysis of impacts that could result from institutional/residential uses at the Nike Missile site, north of the existing wetland, is included in the Final EIS as it was in the Draft EIS, and more detailed analysis would be provided during future site-specific planning efforts. Future site specific planning would also evaluate the extent to which existing wetland features might be expanded. See also Response WR-7 for further clarification of these issues.

Lastly, with regard to the interface between the golf course's edges and the northern edges of the PSHH district, a Golf Course Habitat and Wildlife Management Plan, which will identify management actions to promote linkages between ecological systems and maximize natural resource values, will be prepared and implemented. This will include the edges around the golf course that abut forested, native plant, and landscaped areas. The Trust recognizes the importance of protecting and enhancing small isolated native vestiges scattered throughout the Presidio, which could serve as significant habitat for key pollinators, promote supporting important linkages for gene

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flow, and connect important ecological islands within larger corridors. The Final Plan will ensure further protection of these remnant patches by managing them, to the greatest extent feasible, consistently with the VMP native plant community zone objectives. See also Response OS- 1 for further discussion on these issues.

### **PG-8. *Historic Preservation and Interpretation: Nike Missile Site and Historic Cemetery***

The Fort Point and Presidio Historical Association and the California Heritage Council recommend that the Trust commit to historic preservation and interpretation of the Nike Missile site at the PHSH. The USFWS makes a similar recommendation for the historic cemetery within the PHSH district.

**Response PG-8** – The Nike Missile site, otherwise known as Battery Caulfield, was constructed in 1955 and was operational until 1964. It is not a contributing feature of the Presidio’s NHL. In 1999, the U.S. Department of the Army, Corps of Engineers cleaned up wastes at the site as part of the environmental remediation program. At that time, all of the machinery was dismantled, and hydraulic fluid, equipment and other materials from missile magazines at the site were removed. See Nike Missile Facility Hydraulic Fluid Removal Report, April 1999, found in the Trust’s library. The cleanup was done in consultation with the Presidio Trust and the NPS. It was determined that, since an intact Nike Missile site is in the Marin Headlands of the GGNRA and is preserved for purposes of interpretation, Battery Caulfield should be dismantled.

With regard to the former Marine Cemetery, the Final Plan has been amended, in the PHSH planning guidelines, to include a guideline specific to the protection and commemoration of the cemetery.

### **PG-9. *Land Use Policies***

The Sierra Club requests that the Trust address the extent of the PTMP’s commitment to the following policies of the original GMPA for the PHSH district: demolishing the hospital wings, allowing residential use for Presidio-based employees (with second priority use as an environmental studies school), preserving sensitive habitat consistent with the VMP, and limiting

cultural and educational space to the PHSH district (along with Fort Scott and the Main Post).

**Response PG-9** – The PTMP is consistent with all of the recommendations from the GMPA made by the Sierra Club for the PHSH district. The Final Plan recommends the demolition of the non-historic wings to allow for the rehabilitation of the historic hospital building, with the potential for replacement construction elsewhere within the previously developed areas of the district. The Plan’s preferred land uses for the district are residential and/or educational, as in the GMPA. The sensitive natural habitat in the area will be protected and enhanced, in accordance with the VMP. Furthermore, the Trust’s planning concepts and planning guidelines for this district are derived from and based primarily on those in the GMPA.

## ***CRISSY FIELD (AREA B) DISTRICT***

### **PG-10. *Integration of Areas A and B***

The CCSF Planning Department, the Evelyn & Walter Haas Jr. Fund, and various individuals recommend that the Trust integrate the landscaping and design, development and use of Crissy Field (Area B) with Crissy Field (Area A).

**Response PG-10** – The Trust agrees with the recommendation that planning and design for Crissy Field (Area B) be respectful to and carefully integrated with the Area A portion of Crissy Field. The planning district concept for Crissy Field (Area B) in the Final Plan states that “the Presidio Trust will work in cooperation with the National Park Service to ensure that the successful improvements made to Area A are carefully considered and complemented by activities and changes within Area B.” Through future planning and site designs, the Trust will carefully consider design decisions for landscaping, circulation, parking, as well as land and building uses with regard to their compatibility with Area A.

### **PG-11. *Existing Buildings at Crissy Field (Area A)***

Various organizations and individuals indicate that the PTMP should retain existing buildings at Crissy Field for reuse, mainly for cultural/educational

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(museum) uses. Other individuals believe that the non-historic PX, Commissary, parking lots, and outbuildings should be removed for marsh expansion.

**Response PG-11** – In response to comments, the planning concept for Crissy Field (Area B) in the Final Plan provides more specifics about land and building use preferences than were included in the Draft Plan. The Final Plan states that the net difference in total square footage for this district would be an increase of 30,000 square feet over the current square footage, and that the maximum demolition that could occur is 40,000 square feet. Therefore, the Plan assumes that the majority of buildings at Crissy Field would be reused. Preferred land uses are cultural facilities and educational programs. The Final Plan also states that reuse of the Commissary as museum space will be preferred, but if that is not possible, an alternate museum location might be the historic hangars along West Crissy Field. Building 640 at Crissy Field (Area B) is also called out for preferred use as a museum/interpretive site. The Final Plan allows some lodging as an appropriate use within the Crissy Field (Area B) district, and envisions lodging at historic Stilwell Hall and possibly adjacent buildings. Other Crissy Field (Area B) facilities would offer recreational activities and other public uses to serve visitor needs.

In response to comments about the Crissy Marsh, the Final Plan states the Trust's commitment to the long-term ecological health and viability of Crissy Marsh, and references the agreement between the Trust, the NPS, and the GGNPA to study options for the marsh's health. See Final Plan, Appendix C. Although the Final Plan does not commit to the demolition of non-historic buildings and the removal of pavement to expand the marsh, in response to comments, the Final Plan makes a commitment to forego actions that might preclude marsh expansion for a reasonable period. For up to two years, while the study for the marsh is underway, no long-term leasing or new construction will be allowed in the area east of the Commissary parking lot to the west edge of the historic Mason Street warehouses.

### **PG-12. Amount of Development along Crissy Field**

The NPS and other organizations, as well as various individuals, indicate that the Trust should foreclose new construction and new visitor facilities and significantly limit development and activity at Crissy Field (Area B) to avoid

changing the character of the district, negatively affecting the visitor experience, or duplicating commercial services just outside the Presidio, and to be more compatible with the Crissy Field (Area A) restoration goals. According to the NPS, the Draft Plan proposal to allow 80,000 square feet more than presently exists and 300,000 square feet more than the GMPA “has the potential to change the Presidio’s northern waterfront from an area of respite from urban pressures to an extension of the City itself... The NPS recommends that the level of development in the Crissy Planning District be significantly lowered from the level in [the Draft Plan]...” The BCDC indicates that any new development should avoid affecting the recreational and natural resources along the Bay in Area A and the positive experience of visitors who come to Crissy Field for enjoyment. BCDC is “specifically concerned that the proposed uses in Area B... may generate such a high increase in car traffic and attendance that they may negatively affect the experience of Crissy Field visitors who come to experience its quiet beauty.”

**Response PG-12** – The Final Plan has been amended in response to concerns expressed about the level of development and activity proposed for the Crissy Field district in the Draft Plan. In the Final Plan, the maximum amount of new construction within the district is 70,000 square feet and would only occur in previously developed areas and would be built to principally facilitate rehabilitation and reuse of historic structures. The maximum allowable total building area for the district in the Final Plan is 640,000 square feet, which is 30,000 more square feet than exists today; in other words, a maximum increase of less than five percent in square footage. Compared to the Draft Plan, this change will lower the intensity of potential uses at Crissy Field. New construction would be sited to minimize impacts on adjacent resources and its design will ensure that the association, feeling, and setting of the significant elements of Crissy Field and the integrity of the NHLD are protected. The Final Plan also provides more specificity regarding land uses at Crissy Field by stating “preferences” for museum use at the Commissary and Building 640, and for rehabilitation of Stilwell Hall and possibly adjacent buildings for small-scale lodging.

In response to comments, the Final Plan makes a stronger commitment to “sensitive site enhancements” and resource protection at Crissy Field. Any future proposed changes will have to be in conformance with the planning

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principles and planning guidelines of the Final Plan. Future planning for Crissy Field would be done in cooperation with the NPS to ensure that the improvements already made in Area A are complemented by activities and enhancements made in Area B, and that park and shoreline resources are protected. Major changes proposed, if any, such as demolition and new construction, will be subject to additional planning, design, and analysis with public input prior to implementation.

The Final Plan reflects the Trust's belief that reuse of historic buildings along Crissy Field can be served by installing appropriate visitor-serving uses (cultural programs, some lodging, recreational, and/or visitor amenities). The Trust believes that museums, lodging, cafes, or other cultural facilities are appropriate land uses at Crissy Field and would be consistent with the Bay Plan's Recreation Policy 1.g. which encourages in urban areas adjacent to the Bay "water-oriented commercial-recreational establishments, such as restaurants, specialty shops, theaters and amusements." These uses would also be consistent with the vibrant and successful Crissy Field project in Area A, which attracts thousands of visitors on a daily basis.

### **PG-13. *Dragonfly Creek***

One individual recommends including the entire length of Dragonfly Creek in the Crissy Field (Area B) district to explore ways of restoring the entire riparian corridor.

**Response PG-13** – Dragonfly Creek, a remnant natural system which exists primarily within the Fort Scott district as a riparian corridor, is shown in the Final Plan's Figure 1.6, Wetlands and Stream Drainages, and described in Chapter One. The Final Plan calls for studying possibilities for restoring riparian scrub and oak riparian forest along its banks. The Fort Scott planning district concept calls for the preservation and enhancement of the creek. As part of this future creek enhancement project, options for its connection into the Stables and Crissy Field may be explored.

### **PG-14. *Land Use Policies for Crissy Field (Area B)***

The Sierra Club and others request that the Trust address the extent of the PTMP's commitment to the following policies of the GMPA for the Crissy

Field (Area B) district: expanding the marsh; extending Tennessee Hollow restoration to the marsh (and providing sufficient funding for each project); ensuring that Doyle Drive reconstruction allows both projects; demolishing historic Warehouses 1183-86, the PX and Commissary; prohibiting lodging; limiting museums to existing structures and to themes of aviation and bay ecology; allowing an environmentally-focused school at Stilwell Hall, use of the stables by the U.S. Park Police, and an NPS-run ecology lab.

**Response PG-14** – The Final Plan addresses and is consistent with most of these GMPA-derived recommendations or requests for additional information. Chapter One of the Final Plan expresses a commitment to the long-term ecological viability and health of Crissy Marsh. The GMPA called for the expansion of Crissy Marsh to 30 acres, but it did not identify how to accomplish the goal. The Final Plan describes the recent agreement among the Trust, NPS, and the GGNPA to study an array of options for achieving the health of the marsh including the potential for its expansion into areas that were once tidal marsh. Chapter One, in the same section, also states the goal to restore Tennessee Hollow and to reestablish its connection to Crissy Marsh, the same goal provided by the GMPA. With regard to the comment about sufficient funding for these projects, like any others, the implementation of Tennessee Hollow's restoration or of the Crissy Marsh project will be contingent upon the Trust's success in generating sufficient revenue in the future to cover operating expenses as well as park enhancement projects such as these. As for funding of Crissy Marsh's health, the Final Plan does not presuppose funding sources, which can be better determined once the outcome of the study of options is completed and the scope of what must be implemented is fully understood. The Trust is committed to these projects, but both projects are anticipated to be costly, and the Trust will look towards building partnerships to pursue project implementation and funding options including grants and philanthropy.

The lead agency with final authority to decide the outcome of the Doyle Drive reconstruction process is the San Francisco County Transportation Authority. While the Trust expects to remain active in its planning and outcome, the Trust cannot definitively ensure the final result. The Trust will review and evaluate proposals for Doyle Drive reconstruction, determine their compatibility with protection of park resources and values, including

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Tennessee Hollow and Crissy Marsh, and provide input to SFCTA to influence the Doyle Drive project's consistency with the PTMP.

The comment suggests that Buildings 1183 through 1186, which are contributing structures to the NHL, were to be demolished under the 1994 GMPA, but they were not. With only a few notable exceptions (e.g., the Commissary), the Final Plan does not propose building-specific treatments, but generally commits to rehabilitation of historic buildings to the greatest extent feasible before considering their demolition. Refer to Responses HR-4, HR-5 and HR-6 for additional information on this subject. With regard to the PX and the Commissary, which were both to be demolished under the GMPA, in the Final Plan the Commissary is identified as a priority facility for a museum use, and a specific treatment for the PX is not yet proposed. Instead, the PX is included in the Crissy Marsh Study Area in which no long-term leasing or new construction will be allowed for the next two years (the estimated duration of the Crissy Marsh Study).

Unlike the GMPA, lodging is considered in the PTMP as an appropriate use within the Crissy Field (Area B) district, and Stilwell Hall is called out as a preferred location and historic building reuse opportunity for this use. The Final Plan allows consideration of some additional square footage within the Crissy Field (Area B) district if a building addition or annex is desirable adjacent to Stilwell Hall to make its rehabilitation and reuse viable. Like the GMPA, the PTMP favors museum use at Crissy Field (i.e., included under the general category of cultural uses). Specifically, preferences for museum locations at Crissy Field are the Commissary and Building 640. If reuse of the Commissary were not possible, an alternate location for a museum use would be the former hangars at the west end of Crissy Field (Area B). Unlike the GMPA, the PTMP does not specify the subject matter of the museum programs because these decisions are highly contingent on interest, availability, program partnering opportunities, and outside funding, all of which are unknown. As a result of Congressional directives, two feasibility studies are currently underway: one for a Pacific Coast Immigration Museum (potentially within the Commissary) and another regarding Building 640. See Chapter Two of Final Plan. Where the GMPA called specifically for the creation of an aviation museum at Crissy Field, the PTMP is more open-ended and provides that the important historic events and associations of Crissy

Field's aviation history will be interpreted, but the specifics for this will be determined in the future, in coordination with the NPS. Establishment of an aviation museum would require a substantial commitment of funds by an agency or organization other than the Trust.

Similar to the GMPA, educational uses are also compatible under the PTMP within the Crissy Field district. Although the commentor recommends this use specifically for Stilwell Hall (as an environmentally-focused school) the continued presence of the Crissy Center in Building 603 along Crissy Field (Area B) will ensure a similar use and perhaps be a catalyst for other environmental education programs tied to the Bay's ecology. Consistent with the commentor's recommendations, preferred uses at the stables area will be educational and cultural and the current U.S. Park Police Mounted Patrol will remain in its current location here.

### ***MAIN POST DISTRICT***

#### ***PG-15. Strengthening the Role of the Main Post***

The NPS and two individuals recommend that the Trust strengthen the role of the Main Post as a significant visitor area. (“[T]he Main Post’s southwest corner...with its theater and two museum spaces, offers great potential as a high public use area.”) The NPS notes that the Draft Plan shifts the majority of cultural and community programs from the Main Post to Crissy Field, and urges the Trust to reconsider this approach out of concern with undesirable impacts on Crissy Field (Area A). The NPS encourages the Trust to provide, as did the GMPA, that Main Post buildings would be leased for publicly accessible visitor-serving uses. One commentor also notes that Main Post planning guidelines should reinforce the importance of open views from the Main Post to the Bay, and another commentor opposes small-scale retail at the Main Post because it could compete with adjacent shopping districts.

***Response PG-15*** – In response to these comments, the Final Plan has been modified to strengthen the Plan’s commitment to continue the Main Post’s role as the “heart of the Presidio.” The moniker for this planning district, “Visitor and Community Center,” reflects this commitment, and the district will continue to be a focal point for visitor orientation as well as a community center for the people who live, work and enjoy themselves at the Presidio. The

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Main Post will remain a mixed-use district, as it historically was used by the Army, with land use preferences for cultural/educational uses, offices, and housing with some small-scale lodging and meeting space, and supporting retail services.

The concern with undesirable impacts on Crissy Field (Area A) has been addressed in the Final Plan by reducing the maximum permitted building area for the Crissy Field district by 50,000 square feet from the Draft Plan. This change will lower the intensity of potential uses at Crissy Field (Area B). Nevertheless, the Final Plan continues to reflect the belief that reuse of the historic buildings along Crissy Field (Area B) can be served by installing appropriate visitor-serving uses to complement the existing visitor interest in Crissy Field (Area A). Thus, although the focus of the Main Post in the Final Plan will now be more toward visitor and community uses, this will not preclude other appropriate cultural uses at Crissy Field (Area B). See also Responses PG-12 and PG-14.

In the Final Plan, visitor-serving uses are expected to be accommodated in about one-third of the building space at the Presidio, as discussed in Chapter Two of the Final Plan. The Final Plan includes a discussion of proposed cultural uses (which are generally for public-serving programs), a stated preference for the Main Post and Crissy Field planning districts for these activities, and a listing of current facilities in use for cultural programs, the majority of which are at the Main Post. The Final Plan also identifies a preference for lodging within historic buildings at the Main Post, which would also be open to the public. In addition to public uses within buildings, key outdoor spaces of the Main Post will be enhanced to be more pedestrian-friendly and support visitor use. As an example, the removal of the pavement on the main parade ground will allow for the re-establishment of a major public space for ceremonies and celebrations that will complement the surrounding buildings. Thus, through the combination of several buildings being accessible to the public by virtue of the programs hosted inside, and the complementary inviting outdoor spaces, the Main Post will become a welcome place for visitors. The GMPA's emphasis on public use of the interior building space at the Main Post may be able to be accommodated if users can be found with the capability and interest to fund and use building space at the Main Post for cultural uses. The Final Plan assumes that there will

be a mix of tenants at the Main Post, and not all tenants will offer visitor-serving uses. Such publicly accessible uses may be difficult to find for many of the Main Post buildings. Refer to Responses TS-2 and TS-3.

The PTMP's planning guidelines for the Main Post include a guideline that calls for reestablishing historic views and visual connections, and retaining and enhancing views and vistas from the Main Post to the Bay. Lastly, the Final Plan retains small-scale support retail services as a land use at the Main Post, which is a concept consistent with the GMPA. These types of uses would be similar to the types of amenities (which include a bank, a post office, some small cafes, and shops) that currently exist at both the Main Post and Crissy Field and that are intended to support the Presidio residents, workers, and visitors.

### **PG-16. *El Presidio and Main Parade Ground***

One individual suggests that the Trust should give priority to archaeological excavation, exhibition, and interpretation of El Presidio and demolish the historic barracks buildings located at the site. The Fort Point and Presidio Historical Association indicates that the Plan should provide for careful study and further definition of the Main Parade ground restoration. ("We are concerned over the vagueness of restoration, which should not result in a weed and gopher infested field with no historic relevance... The design guidelines mention restoration of only the "Main Parade" ground ... should be amended to include all parade grounds in the Main Post District.")

**Response PG-16** – The Final Plan articulates a commitment to preserve and commemorate the significant El Presidio. Options for specific treatments will be studied in the future as part of Main Post planning. The Trust will prepare an Archeological Management Plan (AMP) for El Presidio, as stipulated in the PA, and this will inform future treatment options including building demolition, if proposed. In general, contemporary preservation policy for significant archeological sites avoids excavation for purposes of exhibition and interpretation (exposure of the fragile historic material to the elements will often lead to rapid deterioration of the unique site, and maintenance costs are prohibitive). Test excavations, done as part of research and investigations, have been done at the El Presidio site over the last several years, and will be summarized in the AMP. Refer to Planning Principle 4 within Chapter One of

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the Final Plan, which describes the Trust's objectives for managing archeological resources.

With regard to planning for the restoration of the Main Post parade ground, this will be part of the Main Post planning work that will follow from the PTMP as an early implementation action. The Trust is sensitive to the historic importance of the Main Post parade ground and other landscape features, and historic research and analysis of the Main Post's cultural landscape, including the parade ground, has been completed and will be utilized in studying the options for delineating and treating the parade ground.

In response to the request to modify the guidelines to encompass all of the parade grounds at the Main Post, the Final Plan has not been changed as specifically recommended but language has been added to clarify the Trust's intent for the other open spaces. The Main Post parade ground, currently a parking lot, has changed the most over time of all of the parade grounds within the district. The "Old Parade" ground (from the Civil War era post) and Pershing Square still exist as landscaped open spaces, and have not been as severely altered as the Main Post parade ground. El Presidio plaza, currently a combination of asphalt parking lot, roadbed, and landscaped areas, has also changed over time and contains remnant archeological resources both underground as well as within the surrounding buildings. Hence, the Final Plan calls for the restoration of the Main Post parade ground (from a parking lot into a landscaped open space), retention and enhancement of the Old Parade Ground, Pershing Square, and El Presidio plaza. Restoration of El Presidio plaza would be virtually impossible given the level of change that has occurred since the Spanish/Mexican period and hence the Final Plan calls for "commemoration" of the original El Presidio (subject to further research and design, see above). The specific treatments for each of these historic spaces will be subject to future planning and design. These may consider removal or relocation of Buildings 40 and 41, which are historic buildings located within the perimeter of El Presidio. While removal or relocation may aid interpretation of archaeological resources and conservation of the site, they would adversely affect the architectural resources remaining from the last historic phase of the Main Post's development (i.e., World War II era).

### **PG-17. New Construction**

The Fort Point and Presidio Historical Association and the Council on America's Military Past recommend that the Trust not permit any new construction within the Main Post or Fort Scott districts.

**Response PG-17** – The Final Plan would allow for some new construction to occur within both the Main Post and Fort Scott districts. However, further clarification behind the Trust's meaning and intent of new construction has been added to the Final Plan. See Chapter One, Planning Principle 2. New construction will primarily be used to facilitate the successful rehabilitation of historic buildings, possibly in the form of an addition or annex associated with an historic building. In other instances, new construction could be built as infill within an existing building cluster, or as a stand-alone building. However, new construction will only occur within existing areas of development, will be guided by the planning guidelines provided for each planning district, will be subject to additional environmental analysis and public input, and if pursued would be sited and configured to be compatible with the National Historic Landmark District. Other EIS alternatives assess the possibility of no new construction in these areas. Also refer to responses to New Construction comments.

### **PG-18. Land Use and Tenant Policies**

The Sierra Club requests that the Trust address the extent of the PTMP's commitment to the following policies of the original GMPA for the Main Post district: reserving the Montgomery Street barracks and all non-residential buildings for mission-based tenants (and funding rehabilitation of the barracks through non-profit master tenant lease financed by tax-exempt bonds); designating the secondary use of Building 101 as residential only as a last resort to meet housing demand; demolishing Building 211 (Burger King); designating the Officers' Club and Golden Gate Club for conference use and museums as a second priority only if privately funded; designating Funston and Pershing Halls as a bed and breakfast with secondary use as residential at Pershing Hall only if needed to meet demand; subdividing historic housing units to the extent feasible to meet demand; retaining the theater complex and allowing expansion; prohibiting new construction, especially not at the edge

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of the parade ground; returning the parade ground to native grasses; limiting parking to GMPA spaces; and prohibiting an underground garage.

**Response PG-18** – In response to the request to set aside specific buildings within the Main Post for mission-based tenants, refer to Responses PG-15 and TS-7. The Final Plan is programmatic and for the most part does not propose or determine building-specific uses, and therefore the commentor’s specific recommendations for individual buildings is not addressed at this programmatic level. The Final Plan does state that the Main Post will be a focal point for visitor orientation and a community center for people who work, live and visit here. Under the Final Plan, non-historic buildings, such as the former Burger King (Building 211) may be removed in the future to restore historic view corridors or could be reused for an appropriate visitor-serving or other use. Building-specific use proposals will be solicited and competed, as required by the Trust Act, through issuance of RFQs and RFPs as future implementation projects flowing from PTMP. The preferred land uses at the Main Post would be office, cultural and educational uses, and housing. These would be complemented by small-scale lodging, meeting space, recreation and some supporting retail services. The Officers’ Club and Golden Gate Club will continue to be used for meetings and events, and historic structures along Funston Avenue and Pershing Hall are called out in the Final Plan as priority sites for lodging.

In response to subdividing historic housing units, please refer to the Housing discussion in Chapter Two of the Final Plan. There would be a slight increase in the total number of dwelling units within the planning district and these are expected to be accommodated through a combination of subdividing large units into smaller units, converting non-residential space to residential use, and possibly some new construction. The extent and feasibility of subdivisions and conversions will require further building-specific analysis, and will only be undertaken if it can be accomplished in a manner consistent with the Secretary of the Interior’s Standards for Rehabilitation of Historic Properties.

The Final Plan anticipates the rehabilitation and reuse of the historic Presidio Theatre; construction of a building addition or annex could be considered as part of the rehabilitation in order to make it feasible and viable for reuse. New

construction at the Main Post that would reinforce historic patterns of spatial organization and complement the rehabilitation of adjacent historic buildings may be considered in the future under the Final Plan. Building additions or new infill construction will be carefully integrated into the Main Post’s landscape and carried out in accordance with the district’s planning guidelines. See Chapter Three of the PTMP.

Consistent with the GMPA proposal, the Final Plan calls for the restoration of the Main Post parade ground. Its exact treatment and design details will be the subject of future site-specific planning, which may consider alternative turf treatments including native grasses. As for parking, the Final Plan will provide a lesser reduction in the number of parking spaces compared to the GMPA, but will place greater emphasis on encouraging alternative modes of transportation through TDM (including parking fees) to reduce parking demand. The Final Plan states the goal to consider removal or reduction in size of large surface parking lots and to consider options, such as relocation of spaces, for parking to serve visitors and tenants. In response to comments, the Final Plan has removed references to and does not propose underground parking at the Main Post as an option.

## ***FORT SCOTT DISTRICT***

### ***PG-19. Housing vs. Institutional Uses at Fort Scott***

Commentors offer a wide range of opinions on appropriate uses at Fort Scott. The Sierra Club, the University of San Francisco, and various individuals support institutional uses at Fort Scott, with the Sierra Club advocating use of all buildings surrounding the parade ground as an institute (rather than allowing some residential use). Another commentor opposes this view (“Rethink Fort Scott. Parks are not for conventions – use Fort Scott as affordable lodging for families.”) Others submit that lodging at Fort Scott would be acceptable as long as it supports a primary institutional use there, such as conference/education. Others, including Urban Ecology and various individuals, recommend that the Final Plan identify housing as a preferred use for Fort Scott, particularly within the existing North and East Fort Scott housing clusters. Several individuals support educational institution uses at Fort Scott, such as a college or university, and at least one would support

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educational use existing side-by-side with other institutional uses within a “contemplative campus.”

**Response PG-19** – The Trust has considered the differing suggestions for Fort Scott and combined a number of the ideas offered into the proposed mix of uses in the Final Plan. The preferred land use for the Fort Scott district, as stated in the Final Plan, will be an organization or group of organizations devoted to research, policy development, education, and related activities complemented by a strong residential component accommodated in several of the former barracks surrounding the parade ground. Other uses that would be compatible in this campus-like setting include conference space, lodging, recreation, office, community serving retail, and some maintenance facilities. Although not all commentors agree, the Final Plan anticipates that some of the historic barracks around the parade ground could be converted to residential use. Additional residential use within the district is called for at North Fort Scott where existing units could be reconfigured or removed and replaced with new more amendable units. See Chapter Two, Housing, Figure 2.4.

### **PG-20. New Construction within the Fort Scott District**

The Fort Point and Presidio Historical Association, California Heritage Council, and PAR recommend that the Plan prohibit (or restrict) new construction in the Fort Scott district. (“We are opposed to any new construction which we feel will adversely affect the historic character of the district and is an unnecessary expense.”) Other commentors support some replacement housing units in existing housing areas within North and East Fort Scott.

**Response PG-20** – The Final Plan allows for some new construction to occur within the Fort Scott district. For example, a meeting space that could not be accommodated in a historic building may be required to support the educational programs envisioned for Fort Scott. New construction could also involve removal and replacement of non-historic housing within the enclave behind Pilots’ Row to provide for more compatible structures and a more efficient use of space than currently exists. This enclave is quite distinct and separate (visually and physically) from the central portion of the Fort Scott district. Another example of new construction might be the potential relocation of the Golden Gate Bridge District’s maintenance functions from

the toll plaza area. Relocation could require some new construction, as was provided for in the 1994 GMPA for this purpose.

Further clarification about new construction has been added to the Final Plan. See Chapter One, Planning Principle 2. New construction is retained as an option to be used to facilitate the successful rehabilitation of historic buildings. In other instances, new construction could be built as infill within an existing building cluster, or as a stand-alone replacement building. However, new construction within the Fort Scott district will only occur within existing areas of development, will be guided by the planning guidelines provided for the district, will be subject to additional NEPA and NHPA analysis and public input, and will be sited and configured to be compatible with the National Historic Landmark District. The Final Plan indicates that rehabilitation and reuse of existing buildings would be fully considered before pursuing new construction.

### **PG-21. Presidio Trust Control**

One individual indicates that the Trust should not have allowed itself “free rein” in the Fort Scott district (“there will be no external tenant, no rental income projected for the site, and indeed, a projected program budget of \$10 million”).

**Response PG-21** – The commentor significantly misunderstands the Plan’s proposals for the Fort Scott district. The Final Plan includes planning district concepts, planning principles, and planning guidelines which will direct future decisions and changes the Trust makes throughout Area B. The Final Plan also states the Trust’s commitment to the preservation of the Presidio’s NHLD status. Furthermore, the Programmatic Agreement signed between the Presidio Trust, the ACHP, the SHPO, the NPS, and concurring parties sets forth a process for review and consultation for future changes that might have the potential to significantly affect historic resources. All of these measures are safeguards to the protection not only of the historic Fort Scott district but of all of the Presidio under the Trust’s jurisdiction.

Rehabilitation and reuse of buildings at Fort Scott is expected to be a costly endeavor, and will require substantial commitments of funds by the Trust and third parties (tenants or master developers). Until specific information is

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available regarding each individual building – its condition, cost to rehabilitate, and marketable uses – it would be difficult to predict the income it might generate or the number and type of tenants involved. Instead, the Final Plan identifies a range of “preferred” uses and contains principles and guidelines to inform future decisions.

### **PG-22. Land Use Policies**

The Sierra Club requests that the Trust address the extent of the PTMP’s commitment to the following policies of the original GMPA for the Fort Scott district: establishing a single-entity research institute as a priority use; allowing related conferencing and lodging if needed; allowing bed and breakfasts at Pilots’ Row with secondary use of Scott Hall for market-rate employee housing; using North Fort Scott for low-cost housing; rehabilitating historic housing to the extent feasible; using Barnard Hall and Building 1309 for single-room-occupancy units; demolishing five buildings as called for in the GMPA; dedicating all space around the parade ground to an institute, with provision of employee housing at North Fort Scott; and using foundation funding for rehabilitation of institute buildings.

**Response PG-22** – As stated in the Plan, the Trust will actively welcome a single tenant or mix of organizations at Fort Scott dedicated to research, policy development, education and related activities, all complemented by a strong residential component. Preservation of Fort Scott’s rich collection of historic buildings and landscapes will remain the priority. Like the GMPA, the Final Plan also identifies conferencing and lodging as potential land uses. The PTMP is not a building treatment plan; however, regarding clusters of buildings for residential use, Chapter Two in the Housing section identifies several historic residential clusters that would be retained for residential use, including the Pilots’ Row houses. Some of the historic barracks buildings around the parade ground could be retained for housing or converted to other uses. North Fort Scott would be retained or replaced for residential use. With regard to who should benefit from Presidio housing and affordability issues, please refer to responses to Housing comments. The Final Plan allows for a maximum demolition of up to 70,000 square feet at Fort Scott and does not specify which buildings might be demolished. See Chapters One and Two for a discussion of building demolition. The Plan does not preclude the

possibility of demolishing those buildings identified for removal in the GMPA in the future. With regard to funding concerns, refer to Chapter Four of the Final Plan.

### **PG-23. Relocation of Golden Gate Bridge Facilities**

The Golden Gate Bridge Highway and Transportation District recommends that the PTMP address the GMPA recommendations to relocate Golden Gate Bridge facilities to Fort Scott.

**Response PG-23** – The Final Plan allows for the possible relocation of the Golden Gate Bridge Highway and Transportation District’s maintenance facilities, as was recommended in the 1994 GMPA. In Chapter Three, Fort Scott planning district, it is noted that this proposal would require new construction in Area B and would be subject to future planning in collaboration with the District.

### **PG-24. Location of Native Plant Nursery**

The Golden Gate National Parks Association recommends that the Final Plan commit to a permanent site in the Presidio for the native plant nursery.

**Response PG-24** – The Trust and the NPS are currently conducting a facilities needs assessment to determine park operational space needs and locations. This study will explore options for reducing operational costs through co-locating similar functions, strategies for reducing currently occupied space, and overall capital cost needs to bring facilities up to code. In addition, the Trust, NPS and GGNPA are negotiating agreements for continuing their collaboration on natural resources projects. The agreements include a designated amount of building space for the native plant nursery, although the location and delineation of the facility has not been determined. At least for the short term, it is anticipated that the nursery will remain in its current location. Any changes in the future would be coordinated with the organizations involved.

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### **LETTERMAN DISTRICT**

#### **PG-25. Land Use Policies**

The Sierra Club requests that the Trust address the extent of the PTMP's commitment to the following policies of the original GMPA for the Letterman district: allowing no additional housing, reevaluating the "Lucas" (Letterman Digital Arts Center) project, and demolishing Buildings 1029 and 1030 and moving Swords to Ploughshares to the PSHS barracks to allow Tennessee Hollow restoration. Two individuals also indicate that no replacement housing should be allowed at Letterman. Other individuals recommend that, if the LDAC project fails to proceed, the cleared site be kept in open space. Another recommends concentrating commercial enterprises at Letterman.

**Response PG-25** – As was the case in the 1994 GMPA, the Letterman district is one of the most dense planning districts and it will continue to be a compact, mixed-use office and residential area with support services such as food service or small-scale retail under the Final Plan. The Final Plan allows for a potential increase in dwelling units within the Letterman District (see Chapter Two), including the possibility of replacement construction for residential uses. The GMPA called for the retention of Buildings 1028, 1029 and 1030. The Final Plan allows some flexibility to determine in the future whether these buildings are retained or removed. The Final Plan assumes the retention of the units within Buildings 1029 and 1030 that currently house the Swords to Ploughshares tenants with the possibility of relocating the buildings. Building 1028 is identified as housing to be either retained or replaced. This West Letterman site (where Building 1028 is located) would be a preferred location for infill construction to provide more compatible residential structures close to work sites. Refer also to Response BR-7.

With regard to comments about the Letterman Digital Arts Center (LDAC), that project is well underway and was the subject of a separate planning and environmental analysis process. Following completion of the Trust's Letterman Complex Final EIS and Record of Decision (May 2000), the pre-existing two Letterman hospital and research buildings have now been demolished. The Trust will shortly complete all of the site preparation work, and construction of the new LDAC will then begin. Refer to Responses EP-16

and EP-17 for additional information on the treatment of the LDAC project under PTMP.

### **EAST HOUSING DISTRICT**

#### **PG-26. Rehabilitation of Recreational Facilities**

San Francisco Little League requests that the East Housing district section of the PTIP be revised so that it refers not just to "existing active recreation facilities," but also to facilities such as Pop Hicks Fields that were formerly used for active recreation and that now need rehabilitation.

**Response PG-26** – In response to comments, the Final Plan, Chapter Three, East Housing planning district text has been modified to state that the Pop Hicks Field will be restored for active recreational use if consistent with the environmental cleanup plan established for this area, which is proceeding separately from the PTMP process. In general, specific sites and types of recreational activities will be determined through future project-specific proposals, but within the East Housing district, the Final Plan allows for recreational activities that are compatible with the Tennessee Hollow restoration and other natural resource enhancement projects. In addition, pedestrian access to the area will be enhanced in accordance with the Trails and Bikeways Plan to enhance visitor access and recreational opportunities.

#### **PG-27. Land Use Policies**

The Sierra Club requests that the Trust address the extent of the PTMP's commitment to the following policies of the GMPA for the East Housing district: demolishing 52 units at MacArthur and Waller Street to restore Tennessee Hollow, demolishing Buildings 777/779/808/809, allowing no new construction or infill, subdividing non-historic units to meet housing demand, and subdividing historic units with basement-level studios to the extent feasible. The NRDC asks why housing is not shown as a preferred land use in the East Housing Planning District on Figure 6 of the EIS.

**Response PG-27** – The Final Plan calls for the removal of 66 non-historic units, including MacArthur Avenue, Waller Street, Buildings 777, 808 and 809, within the East Housing planning district to restore open space and the

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Tennessee Hollow stream corridor. See Final Plan, Chapter Two, Figure 2.4. The Plan proposes to retain or increase the existing number of housing units by dividing large units into smaller ones, and possibly through compatible replacement construction elsewhere within the district. New construction will not preclude the restoration of Tennessee Hollow and could, in fact, be a demonstration project for compatible and sustainable building design within a watershed. The extent of unit subdivisions will be subject to future design analysis; new construction would require additional planning, environmental analysis, and public input. With respect to the NRDC's comment, the preferred use stated in Figure 6 in the Draft (and Final) EIS for East Housing is "housing". Refer also to Response BR-7.

### ***SOUTH HILLS DISTRICT***

#### **PG-28. Land Use Policies**

The Sierra Club requests that the Trust address the extent of the PTMP's commitment to the following policies of the original GMPA for the South Hills district: demolishing Wherry Housing, one-third by 2013 and the balance no later than 2020; considering demolition of West Washington over time to protect natural resource habitat; and allowing no new construction. Various individuals recommend comprehensive planning for restoration within the South Hills, Lobos Creek and PHSH areas, and removal of the Building 1750 complex for completion of dune habitat restoration.

**Response PG-28** – As did the original GMPA, the Final Plan anticipates removal of Wherry Housing over time. Its removal would be phased over about 30 years and the exact phasing would depend upon the availability of revenues to fund demolition and natural habitat restoration. Financial modeling assumes removal of Wherry Housing in thirds: one-third by 2010, another third by 2020, and the final third by 2030. See Chapter Four, Park Implementation. The phased removal would enable the integration of the core habitat between the Lobos and Wherry Dune lessingia sites. In addition to Wherry Housing, the Final Plan calls for the removal of the western West Washington housing units and some of the northern East Washington units, to allow for natural resource and other open space enhancement projects. No new construction is contemplated for the South Hills district.

The Trust has already undertaken the commentors' recommendation to plan restoration comprehensively. The adopted VMP looks at the park from a vegetation zoning perspective rather than a planning district perspective. As a result, the planning for natural resource and vegetation preservation and restoration in the southern half of the Presidio will be based on a system-level approach and not a planning district one. Consistent with the 1994 GMPA, the Building 1750 facility will remain as the Presidio Trust's Facilities offices. The area surrounding Building 1750 is primarily in Area A, under the NPS jurisdiction, and is called out as a Special Management Zone (SMZ) in the VMP. Completion of restoration planning for future dune habitat restoration activities would be coordinated through planning for the SMZ. The Trust is undergoing USFWS Section 7 consultation under the Endangered Species Act and has submitted a Biological Assessment that outlines the phased demolition. It is anticipated that the Service will provide a Biological Opinion regarding the analysis and conservation measures provided within the Biological Assessment and EIS. The Trust is also providing comments to the USFWS on the Draft Recovery Plan for Coastal Plants of the Northern San Francisco Peninsula regarding implementation feasibility.

#### **PG-29. Recreational Facilities and Habitat Restoration**

Two individuals request that the Trust clarify the extent of access to recreational facilities in the South Hills district. San Francisco Beautiful recommends that the golf course edges be treated as natural areas, while one individual recommends removing the golf course and restoring it to native habitat. The San Francisco State University Biology Department recommends restoration of the ridgeline connecting the Lobos Creek and Tennessee Hollow watersheds.

**Response PG-29** – The South Hills district currently has many publicly accessible recreational amenities, for both passive and active recreation, which will be preserved and retained. These include the Presidio Golf Course, Rob Hill Campground, numerous hiking trails, and the Julius Kahn Playground (managed by the CCSF). Improved access to these amenities is included in the Access and Circulation section of the District Concept in the Final Plan, Chapter Three. For further discussion on recreational uses, please refer to the Final Plan, Chapter One, Planning Principle 10.

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The Final Plan does not contemplate removal of the Presidio Golf Course as the commentor suggests. The golf course is a contributing feature of the NHLD, is currently under lease to the Palmer Golf Corporation, and provides a recreational amenity for the general public. Many of the golf course's edges abut natural areas, including historic forest stands, and will be treated according to the recommendations of the approved VMP. The Trust is currently working with Arnold Palmer Golf Management to develop a Habitat and Wildlife Management Plan for the golf course. The plan will focus on the "natural areas" (non-turf areas), and will include a baseline natural resource values assessment and management strategies and recommendations that would promote greater wildlife movement between the Marina and Lobos Valley watersheds, and increased habitat diversity and viability. This planning effort is expected to begin in late 2002.

### **TENNESSEE HOLLOW**

#### **PG-30. Planning Recommendations**

The NPS and one individual recommend that the Trust designate the Tennessee Hollow watershed as a separate planning district focused on resource stewardship. One individual recommends that the eastern boundary of the Main Post district be realigned to exclude Tennessee Hollow, allowing a more holistic approach to restoring this watershed. Another individual recommends that the Trust increase its commitment to restoring Tennessee Hollow by providing adequate setbacks; removing the landfill, Morton Street ball field, and buildings along MacArthur; and no construction of new buildings. The Sierra Club and one individual recommend policies for restoration of the watershed and its riparian habitat, and no new construction in Tennessee Hollow.

**Response PG-30** – Tennessee Hollow traverses several planning districts, including the eastern edge of the Main Post. The boundaries of the planning districts are not determinative of future actions, such as the extent of the Tennessee Hollow restoration, and therefore the boundary of the Main Post planning district has not been changed from the Draft Plan. Planning for Tennessee Hollow's restoration will examine the natural system and apply watershed management principles to the creek tributaries and riparian corridor as a whole functioning ecological system, rather than as segments between

planning districts. The alignment represented in the Plan is consistent with historical literature and maps.

Not unlike the VMP that studied the Presidio's vegetation zones, natural resource preservation and enhancement projects will generally be approached and studied as systems rather than according to any generally artificial planning district boundaries that exist only on a map.

For response to commentors' other issues concerning Tennessee Hollow, refer to Responses BR-5, BR-6 and HO-14.

#### **PG-31. Effects on Historic/Cultural Resources**

The Fort Point and Presidio Historical Association and the California Heritage Council recommend that the Plan and EIS address possible adverse effects of Tennessee Hollow restoration and enhancement on individual historic properties and the integrity of the National Historic Landmark District. In light of their concerns, they strongly suggest that the Tennessee Hollow project should be subject to further study. The Fort Point and Presidio Historical Association, and the Council on America's Military Past, and several individuals suggest that the benefits of the restoration project are greatly outweighed by the costs to historic resources.

**Response PG-31** – The Trust recognizes that the restoration of Tennessee Hollow implicates a number of important, sometimes competing, policy goals that must be balanced. The planning process for the restoration of Tennessee Hollow will be a separate planning process with appropriate environmental analysis. This planning effort has begun with the collection of baseline data and monitoring, an initial public workshop (held in November 2001), and is anticipated to continue this summer, with a public scoping meeting occurring sometime in the Fall 2002. One of the key studies underway is an assessment of existing cultural resources within the study area, including archeological resources and the cultural landscape. As part of this planning effort, the Trust expects to study alternatives that explore a range of options for the creek's restoration and the potential effects on cultural resources. As stated in Chapter One of the Final Plan, the Trust is committed to the preservation and protection of the NHLD, and therefore, through future planning, will seek to minimize harm to those resources that contribute to the District's integrity.

# RESPONSE TO COMMENTS

## 4. Responses to Comments

While there may be an effect on individual properties over time, or as part of an overall planning effort in which other resource values are balanced, the Trust will protect the status of the NHLD. Lastly, as part of the planning efforts for Tennessee Hollow, costs will be included and funding for the restoration will be contingent upon numerous factors, from Trust-generated revenues to philanthropic support. Refer also to Response HR-16.

### **OTHER**

#### **PG-32. Gates**

The Pacific Heights Residents Association and various individuals indicate that the Trust should not open new gates nor reopen any old gates. Others indicate that the Trust should clarify its plans for the Greenwich Street Gate, and support opening this gate to cyclists and pedestrians.

**Response PG-32** – No new gates without historic precedent are contemplated in the Final Plan. However, the Final Plan calls for the reestablishment of the historic pedestrian entry at Chestnut Street for pedestrians only, and the historic Greenwich Street Gate for pedestrians and bicycles only (no vehicles). Reestablishment of these two pedestrian gates will provide for easier visitor access, convenient connections to public transit, and an enhanced pedestrian circulation system. In addition, the Plan allows for the potential re-opening of the 14<sup>th</sup> Avenue Gate to vehicular traffic, subject to future planning and analysis associated with the reuse of the PSH district.

#### **PG-33. Landfill Clean-Up and Water Conservation Programs**

The Sierra Club requests that the Trust address the following policies in the Final Plan: ecological restoration; clean-up and habitat restoration at landfills in Tennessee Hollow, Graded Area 9, and Landfill 8; and water conservation and recycling programs.

**Response PG-33** – Refer to Chapter Two, Infrastructure and Facilities, in the Final Plan for each of these subject areas. The clean-up and remediation program for the Presidio is a separate and distinct process from the PTMP. Specific remedial action proposals will be determined through that process. With regard to water conservation and recycling programs, refer to Chapter Two of the Final Plan, and Section 4.6.1 of the Final EIS. The Trust has active

programs for solid waste management (including the Presidio Recycling Center, the Presidio Salvage Program, and Composting) and water conservation, and has proposed an on-site water recycling system which is currently undergoing environmental review. Refer to Response UT-3, for additional information on water conservation and Mitigation Measure UT-9 regarding waste diversion.

#### **PG-34. Incorporation of Specific GMPA Concepts and Objectives**

The Pacific Heights Residents Association (PHRA) provided a letter reciting all of the 1994 GMPA concepts and objectives that it recommends the Trust to incorporate into the Final Plan, as well as various opinions and criticisms of the Draft Plan. The PHRA specifically requests the Trust to identify why each of the recommendations (for vision, objectives, and implementations) are or are not possible for inclusion in the Final Plan.

**Response PG-34** – Responses to issue-specific comments raised in the PHRA letter are provided in multiple sections of this document (refer to the Directory in Chapter 6). The focus of this response is on the overarching recommendations for inclusion of the various GMPA objectives into the Final Plan.

The PTMP looked to the 1994 GMPA as the foundation for the Trust's planning, and it is reinforced by both the Trust Act and Trust policies articulated in the Final Plan. The one area in which the Presidio Trust's Final Plan departs from the GMPA is in the Vision. See Response VI-6. Otherwise, as stated in the Draft Plan on page 17, the planning principles contained in Chapter Two of the Draft Plan largely came from the GMPA. In some instances they were modified or newly proposed to address Trust management approaches, new opportunities, or Trust Act mandates. Chapter Two of the Draft Plan also provided information about current activities underway to implement concepts consistent with the GMPA. These planning principles are carried forward into the Final Plan and emphasize the importance of the Trust's role in protecting, managing, and enhancing the Presidio's significant park resources. See Response GP-1.

The following is a cross-referencing for where these concepts from the GMPA, are found in the PTMP.

# RESPONSE TO COMMENTS

## 4. Responses to Comments

GMPA	Final Plan
Vision	See responses to Vision comments and Final Plan Overview
Preservation and Recreation	These concepts are embedded in the content of Chapters One and Two in the Final Plan, which promote the preservation and protection of valuable park resources and provision of interpretive, educational, and recreational opportunities within the Presidio
Orientation and Accessibility Improvements	See Planning Principle 15, Final Plan
Interpretation and Education	See Planning Principle 11, and Chapter Two, Land Use - Public Uses in the Final Plan
Celebration of History, Culture and the Arts	See Planning Principle 14, Final Plan
Recreation and Renewal	See Planning Principle 10, Final Plan
Resource Management	See Planning Principles 1, 2, 3, 6, 7, and 8, Final Plan
Historic Building Rehabilitation	See Planning Principle 1, Final Plan
Cultural Landscape Preservation	See Planning Principles 1, 2, and 3
Scenic Vista Enhancement	See Planning Principle 9, Final Plan
Archeological Investigation	See Planning Principle 4, Final Plan
Collection Preservation	See Planning Principle 5, Final Plan
Open Space Extension	See Planning Principle 9 and Chapter Two, Land Use - Open Space in the Final Plan
Native Plant Enhancement	See Planning Principle 6, Final Plan
Historic Forest Rehabilitation and Preservation	See Planning Principle 3, Final Plan
Wildlife Protection	See Planning Principle 7, Final Plan
Water Resource Management	See Planning Principle 8, Final Plan
Sustainable Foundations	See Chapter Two, in particular the sections on Transportation, and Infrastructure and Facilities in the Final Plan
Comprehensive Transportation Strategy (there are multiple headings - recommend we address under this one umbrella)	See Chapter Two, Transportation, in the Final Plan
Community Support - Residential Use	See Planning Principles 12 and 13, as well as Chapter Two, in particular the section on Land Use that includes a discussion on housing and other building uses
Community Services and Facilities	See Chapter Two, Land Use in the Final Plan
Public Safety	See Chapter Four, Public Involvement and Partnerships in the Final Plan
Sustainable Design and Conservation Practices	See Chapter Two, Infrastructure and Facilities (all sections), in the Final Plan
Integrated Pest Management	See Planning Principle 6, Final Plan
Pollution Abatement	See Planning Principles 8, 9 and Chapter Two, Transportation in the Final Plan
Hazardous Waste Cleanup	See Chapter Two, Infrastructure and Facilities- Environmental Remediation, in the Final Plan