

4.8 TYPE OF PLAN (TP)

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FLEXIBILITY OF THE PLAN

TP-1. *Suitability of a Flexible Planning Approach*

Commentors express differing opinions about the Trust's use of a flexible planning approach. Several commentors, including San Francisco Beautiful, note that the concept of a general plan and broad policy framework is appropriate, citing the need to respond to changing future economic and market conditions. ("The Trust is wise not to micro-plan within the context of general land use designations since recent market events prove once again that markets are cyclical in nature.") More commentors, however, including several local neighborhood groups and land use interest groups, express concern over the flexibility and latitude of the Draft Plan. They believe the Draft Plan is so vague as to impose no real constraints on future actions, and allows the Trust Board and staff unlimited discretion to select future land uses. (The Draft Plan "is so general it gives future Board and staff almost unlimited discretion to select land uses.") Some also believe the degree of flexibility in the Draft Plan prevents it from being used as a framework for future management and decision-making; leaves too much to resolution

through consensus building on future site-specific, district-level and issue-oriented plans; and leads to a fear of over-development of the Presidio. ("The Draft [Plan] is so ambiguous, so heavily qualified, and so laden with disclaimers that it seems to commit to virtually nothing!" "The PTIP is quite vague. It is a breeding ground for slowly but surely turning the Presidio into the equivalent of a seaside resort, office park, and suburb, rather than a unique, pristine as possible national park.") To allay fears and improve public acceptance of the Plan, commentors ask for a better balance between flexibility and constraints, better definition of significant planning ideas in the Final Plan, and a commitment to more specific future plans and proposals, coupled with full public involvement.

Response TP-1 – In its approach to development of the Draft Plan, the Trust had in mind the point of view of those commentors who recognize the usefulness of a planning approach that includes an element of flexibility. Even after fully considering commentors' concerns on this issue, the Trust still believes a flexible planning approach is both needed and appropriate. One of the primary factors that now distinguishes the Trust's needs from the 1994 GMPA is the need to consider economic and market possibilities in a new way. The financial plan of the GMPA (the Presidio Building Leasing and Financing Implementation Strategy, July 1994) assumed guaranteed outside funding. In short, Congress will terminate outside funding. Philanthropic contributions are welcome, but at best uncertain. The Trust must depend on leases of properties in Area B to assure financial sustainability and assure the preservation of the Presidio as a national park. The Trust cannot be sure of the timing of cash flow, the availability of tenants, or expected financial outcomes, and so must adopt a plan under which financial uncertainty can be managed. For this basic reason, and because it would be unrealistic for any agency to predict with certainty circumstances that will arise over the next 20 to 30 years, the Final Plan must be adaptable enough to allow the Trust to consider alternative ways to generate revenue and respond to market conditions by considering alternative users, if necessary.

The Final Plan therefore remains a programmatic plan for all of Area B that includes some flexibility to determine future site-specific uses. It defines a comprehensive policy and land use framework within which the Trust will pursue more specific project proposals. The Trust's programmatic approach to

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comprehensive planning, although not always welcomed by many of the commentors, is appropriate and accepted in other land use planning contexts. The programmatic planning approach is perhaps most widely used and understood in the city planning arena, where municipalities commonly develop a city's General Plan and a zoning ordinance that defines broad policies and a land use framework. More specific land use projects are then proposed, reviewed and evaluated for consistency with the overall policies of the General Plan and the land uses and standards of the zoning ordinance. This is essentially the approach of the PTMP and is more appropriate than a specific plan, which would require constant amendment as conditions change.

The Trust nevertheless recognizes, based upon comments, that the public is distrustful of the programmatic approach and the flexibility it allows, regardless of its utility to the success of the Plan. The Trust has therefore changed the Plan in several ways to address these concerns. First, the Trust has substantially changed the style of the Plan to make its content more clear. The way in which the Draft Plan was presented created the mistaken impression that there was greater degree of flexibility than the Draft Plan actually allowed. The text of the Draft Plan apparently made it difficult for reviewers to see and to understand the overall direction of land use at the Presidio or the policies and parameters that would constrain inappropriate development. The Final Plan is therefore shorter, more direct, and to the point. This change in style clarifies the direction of the PTMP and better informs the public of its details.

As an example, the Final Plan now makes clearer its overall land use program: about three-quarters of the park will be open space and only one-quarter built space, which will be within already developed areas of the park. Furthermore, the Final Plan gives better definition to the built space, explaining that today's existing square footage will be reduced over time and within what remains, about one-third will be public serving uses, another third will provide housing, and the last third will provide office uses for a mix of public-serving and private-sector tenants.

Other ways in which the Final Plan has been changed to address commentors' flexibility concerns is to provide both increased specificity where possible and assurances that future public process and input will be available where

flexibility must be retained or uncertainty exists. Refer to Responses PI-1, PI-2, PI-8 and PI-10. As examples, the housing element has been made more specific, showing within ranges how the overall housing goal can be achieved when broken down by planning district. Some commentors are very concerned at what they perceived as the failure to specify the exact location, size, and details of future housing construction. The Final Plan still holds open the possibility of new construction to replace existing housing units removed to create additional open space; however, the location is clearly constrained to previously developed areas where the integrity of the NHLD will not be compromised. Example locations are described and the number of units is constrained (200 to 400). Remaining uncertainties are further constrained by providing for a thorough public process and environmental review in the future, if and when the specifics of any new housing construction is proposed.

Similarly, the overall goals for educational uses have been disaggregated from cultural uses, and a few building-specific preferences have been identified for certain cultural users (museums). More specificity, too, is now offered with respect to lodging. See Responses LO-1 and LO-5 for additional information on lodging. In response to comments that had imagined newly constructed, large-scale, high-rise, resort-style lodging along the waterfront, the PTMP now makes clear that limited lodging uses are more likely and are preferred for existing buildings at the Main Post, Crissy Field, and Fort Scott districts. New construction is seen only as a way to facilitate the historic rehabilitation and reuse of existing historic buildings, if required, through building additions or annex structures.

With these changes, the Trust believes it has provided a plan with a workable mixture of flexibility, specificity, constraints, and further public process that, as requested by commentors, strikes a balance. When the increased Plan specificity and assurances of future public process are combined with the policy principles articulated in Chapter One of the Final Plan and the planning guidelines in Chapter Three, the Final Plan is a far cry from what one commentor had imagined as a "breeding ground ... for a seaside resort, office park, and suburb..." The Trust will not and cannot use the flexibility of the Plan to impair the qualities that make the Presidio a park and a treasured resource.

SPECIFICITY OF THE PLAN

TP-2. The Plan Should be More Specific

Several commentors go beyond expressing concern with planning flexibility and instead call for the Trust to develop a much more specific Final Plan. A few comments note generally that more details should be provided to the public in the Plan, while others make more specific suggestions that the Trust develop a building-specific plan by planning district. (“The Trust should choose and identify a preferred use for each building. It should present a building use map, along the lines of that developed by the Sierra Club, identifying a clear, unequivocal description of the use and location of each building.”) Some commentors ask the Trust to specify what kind of new construction is envisioned, how much, and its specific location. (“If decisions were made, the final EIS would be a far more understandable and useful planning document. . . The need for future flexibility . . . is always available . . . through a plan amendment process.”) One commentor stated the belief that the Trust has “very specific ideas” and not to provide building-specific details “casts a pall of disingenuity” over the Plan. Several organizations, including the Sierra Club and the NRDC, infer that the PTMP should be a building-specific use plan (similar to the plan prepared and submitted by the Sierra Club) which identifies priority and secondary uses for buildings, and request that such a plan is included in the Final Plan.

Response TP-2 – In response to comments that asked for more detail in the Plan, the Trust has added specificity to certain elements – including housing, lodging, education, and cultural uses – of the Final Plan. See Response TP-1 and TP-5 above, as well as the Introduction of this document, which provides a summary of the changes made in the Final Plan and Final EIS in response to public comments. The Trust agrees with commentors that adding this level of specificity to the text and graphics of the Final Plan was important to improve its clarity.

The Trust declines, however, to implement the suggestion of those commentors who urge the Trust to develop a prescriptive, building-specific land use plan rather than a programmatic plan. These commentors, apparently out of concerns over the Plan’s flexibility, suggest as a solution an approach that does not effectively consider or address the financial and market

uncertainties that the Trust must manage. As is pointed out in the Trust’s statement of need for the Plan: “At times, the Trust may not be able to conclude a financially viable transaction on an otherwise desirable project because of, for example, obsolete building configurations, tenant needs, or other factors. In some of these circumstances, the Trust may wish to consider other options such as alternate uses, a change in location, or possible building demolition with new replacement construction. At other times, apparently favorable projects may have to be deferred, changed or foregone because of financial factors such as cash flow concerns or market conditions. Market demand could fail to deliver an intended use, or changed market conditions could require a different approach to leasing or financing that better addresses the existing market opportunities or realities at the time. The Trust needs the flexibility of a programmatic, rather than prescriptive, plan to respond to market factors like these.”

A building-specific plan presents the same problems that the NPS and Trust already faced as they worked to implement the GMPA’s building use prescriptions. For example, in the GMPA, the Letterman Army Medical Center (LAMC) and Letterman Army Institute of Research (LAIR) were identified for use as medical and research facilities. When the NPS issued its Request for Qualifications (RFQ) in 1993 soliciting proposals for reuse of the Letterman Complex, of 16 proposals received, only two were for medical laboratory use of LAIR. Of the two, NPS chose to enter into negotiations with the UCSF Medical Center. These lease negotiations were unsuccessful, as were other lease negotiations with the California State Department of Health Services (DHS), proposing use of the laboratories for public health programs, and later with the City and County of San Francisco Department of Public Health for temporary use of LAIR as laboratory and office space. Later, the Trust also tried to find a user that fit the prescribed use in the GMPA, but ultimately had to consider others outside the medical and research arenas. This approach met with objections, at least in part because it departed from the specific use prescriptions of a building-specific plan. See Response AL-1 for further examples of the GMPA’s specified building uses that have not come to fruition.

Developing a prescriptive plan and amending it each time a specified building use cannot be met, as is suggested by comments, is inefficient, makes little

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sense given the Trust's financial and leasing mandates, and is a misleading approach. The process involved in soliciting potential tenants is already a lengthy one. Adding the additional step of having to complete a plan amendment process each time the Trust needs or wants to consider a different tenant type would unreasonably lengthen an already lengthy and cumbersome leasing process. The Trust simply does not know and has not yet decided what the specific use of each building at the Presidio could or should be. These building-specific proposals can be best made in the context of more targeted area site planning, or through leasing solicitations to determine specifically what the market will support. Creating a building-specific plan would suggest a level of decision and certainty that does not exist and cannot exist in any plan that will take 20 to 30 years to implement, and would therefore be misleading. As has already been said, where uncertainty remains or flexibility has been retained, further public process at the time in the future, when more specific projects are proposed, will ensure that physical changes are in keeping with the Presidio's character, and that the public's input is considered. Rather than guessing today at the intended use of each building, the PTMP sets out the general character of each district along with overall square footage and the extent of certain uses. Leasing proposals, when made, will fall within these bounds and be consistent with the general land use and square footage described. If a proposal is inconsistent, or involves new impacts not considered in this EIS, the Trust will analyze the potential effects of any proposed inconsistencies and provide for a public process and review as called for under NEPA and the Trust's own policies. Refer to Responses PI-1, PI-2, and PI-10 for additional discussion of future planning and public involvement.

TP-3. *More Specific Plan is Needed*

A few commentors express the opinion that a more specific plan is needed because the Presidio is a public park and the public is therefore entitled to know what the Trust Board expects it to look like in 2013 and to participate in a meaningful manner in shaping its future. They ask that the Final Plan provide more specificity so that it imposes real limits to evaluate the stewardship of the Board and determine progress toward goals.

Response TP-3 – The Trust staff and Board believe that the PTMP and the planning and environmental review process that has surrounded its development has offered a comprehensive, realistic, and clear picture of what is now known about the land use goals and overall approach to the stewardship of Area B of the Presidio. In response to comments, both the clarity and the specificity of the Plan have been improved, and these changes serve to make clear that the Presidio will retain its park-like character and remain largely open space, and that leasing will be split among three categories of land uses – public uses, housing, and office uses. See Response FL-1 above for further discussion of how the clarity and specificity of the Final Plan have been changed in response to comments.

The Final Plan contains goals statements with which to evaluate the stewardship of the Trust. The planning principles in Chapter One set the policies under which all future planning and projects will proceed. Chapter Two defines land use, transportation, and infrastructure goals, and the district-level parameters in Chapter Three provide further qualitative standards and quantitative limits.

A more specific plan would not offer a clearer picture and would, in fact, offer a misleading picture. The Trust simply does not know and has not yet decided what the specific use of each building at the Presidio could or should be. Creating a more specific plan by specifying site-specific users and uses would suggest a level of decision and certainty that does not exist and cannot exist given the amount of space involved and the variables that will influence its use or disposition over the next 20 to 30 years. The PTMP planning process is not the end of the decision-making process for Area B; it is the beginning. The public will have many further opportunities to consider and evaluate the stewardship of the Trust as the Plan is implemented. Refer to Responses PI-1, PI-2, PI-3, and PI-10 for additional information.

MEANS TO ACHIEVE FLEXIBILITY

TP-4. *Use GMPA Approach to Achieve Flexibility*

A few commentors suggest that the Trust could provide the level of specificity in the GMPA and still have needed flexibility. ("A good plan can be both specific and flexible. I believe the 1994 GMPA is a good and amply flexible

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plan. I ask that in revising the GMPA plan, the Trust strive to retain the GMPA's specificity....")

Response TP-4 – In the GMPA, the NPS chose to develop a highly specific and prescriptive plan. Its prescriptive elements have not proved flexible enough to allow its efficient or smooth implementation and thus, in the short time since its adoption, both the NPS and the Trust have been forced to depart from the plan. Specific departures have included changes in building use such as the decision to use historic homes on O'Reilly Avenue for offices; the decision not to pursue a consolidated public safety facility, but to add an addition to the Presidio Fire Station instead; the decision to seek other uses for the LAMC and LAIR buildings when a health science research facility was determined to be infeasible within a reasonable amount of time; the decision to locate a maintenance facility towards the center of the Presidio Golf Course rather than at the clubhouse site; the decision to construct an 18-acre total marsh rather than a 30-acre marsh, and more. These changes more than anything else demonstrate the need for a more flexible plan, that can provide a reasonable vision of the future – including what is certain and what is not.

One of the primary factors that now distinguishes the Trust's needs from the 1994 GMPA is the need to consider economic and market possibilities in a new way; and the GMPA's restrictions on tenant type, prescriptive use of buildings, and underlying financial assumptions make that impossible, as described in the Purpose and Need Chapter of the EIS. The Trust needs to adopt a plan under which financial uncertainty can be managed; a plan with a high level of specificity and prescription would place unnecessary restraints on the possibilities to manage uncertainty successfully. For this basic reason, among others, the PTMP must be adaptable in a way that the 1994 GMPA is not.

The Trust agrees, though, that a good plan can be both specific and flexible, and the modifications made to the Final Plan in response to comments achieves this result. See Responses FL-2 and FL-5 for further discussion of how the Final Plan retains enough flexibility while adding both clarity and specifics.

TP-5. Identify Primary and Secondary Uses

The Sierra Club and a few other commentors suggest how the Trust could achieve flexibility while offering increased specificity in the Final Plan. They suggest first that the Trust strike a balance between the need for flexibility and the public's need for certainty by identifying a single preferred use and secondary use for each building or building complex. They also suggest the Trust can achieve all the flexibility it needs by selecting and identifying in the plan a secondary use for specific buildings or groups of buildings if the primary use becomes unworkable or infeasible. Primary and secondary uses would be adopted after appropriate assessments are conducted and included in the EIS. Any concern by the Trust that this approach would affect the flexibility to achieve financial goals is described by the Sierra Club as not a valid assertion.

The NRDC suggests another means to achieve flexibility. That is, where the same use is identified in multiple planning districts, the Plan could be made more specific by identifying a preferred location and backup locations and by better identifying priorities within an area. They recommend that where it is unlikely that a use would be provided in multiple districts – such as a conference center use – the Trust should decide at which location it will first request lease offers for that use and state that preference in the Final Plan.

Response TP-5 – The Trust believes that there is utility in the suggestion made by NRDC and other commentors to better identify priorities when a use is provided in more than one district. The Trust has somewhat modified the approaches suggested, and instead of specifying a preferred location and backup locations across the board for all uses in all districts or preferred uses and secondary uses for all buildings, the Trust has combined the identification of priority locations with the identification of some-building specific preferences to achieve an overall increased level of specificity within the Final Plan. Specifically, the Plan now better identifies priority locations for lodging, cultural, educational, and residential uses.

With respect to conference uses, the Draft Plan identified conference use as a possibility in four districts, two priority locations at Fort Scott and Public Health Service Hospital, and provided little characterization of conference type uses. The Final Plan continues to allow conference use in several

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districts but characterizes the use more clearly as accessory to or supportive of other uses such as educational, lodging, and office uses, rather than as a large stand alone conference center of the nature proposed at Fort Baker. This use is further clarified by identifying existing space in this land use category (e.g., the Golden Gate Club and the Officers' Club at the Main Post and the Log Cabin at Fort Scott). See also Response LO-3.

With respect to lodging, the Draft Plan identified lodging use as a possibility in three districts, but provided no preferred locations or buildings. The Final Plan identifies lodging as a preferred use in these three districts, quantifies the lodging square footage anticipated within each (i.e., up to about 64,000 square feet (sf) at Fort Scott; 137,000 sf at Crissy Field (Area B); and 51,000 sf at the Main Post), and identifies preferred sites (i.e., Pershing Hall at the Main Post and Stilwell Hall in west Crissy Field (Area B)). The Final Plan also provides better clarity about the nature of lodging. See the Lodging and Other Visitor Amenities section in Chapter Two of the Final Plan.

With respect to cultural and educational uses, the Draft Plan allowed these as potential uses in all but the South Hills district, aggregated the uses, and provided little specificity about the nature or location of this more than 900,000 sf of space. The Final Plan considerably enhances the level of specificity and clarity with respect to these two uses. Cultural use (about 530,000 sf) has been disaggregated from educational use (about 390,000 sf) and priority districts specified for each (Crissy Field (Area B) and Main Post for cultural uses and Public Health Service Hospital and Fort Scott for

educational uses). Furthermore, 100,000 sf of existing building space already dedicated to cultural/educational use is specified (i.e., the Officers' Club at 35,000 sf, the Presidio Theater at 15,000 sf, the Post Chapel at 7,000 sf, the Herbst Exhibition Hall at 11,000 sf, Crissy Center at 12,000 sf, and the Park Archives and Records Center at 19,000 sf), leaving only 430,000 sf for specific uses to be determined in the future. Of this 430,000 sf, three existing buildings are identified as possible and preferred museum locations (the 100,000-square foot Commissary, the historic Crissy Field hangars, and Building 640, all at Crissy Field (Area B)). In addition, more specificity is provided with respect to housing. See the housing discussion in Chapter Two of the Final Plan and responses to comments on Housing for additional detail.

As described in the responses to comments above, providing greater specificity than that provided in the Final Plan would be misleading in the sense that it would suggest a level of certainty that does not exist. Even the suggestion that all buildings be designated one preferred and one back-up use, implies a level of certainty or decision-making that is not possible in many instances without site-specific investigations of the physical characteristics of buildings and spaces, and of the financial feasibility associated with rehabilitation and reuse. Where possible, such as with over 200 residential buildings and other examples cited above, use preferences have been articulated. To suggest the same treatment for all buildings is simply infeasible within a plan that will be implemented over 20 to 30 years.