

1. INTRODUCTION

This is Volume II of the Final Environmental Impact Statement (Final EIS) regarding the proposed management plan for areas of the Presidio of San Francisco (Presidio) under Presidio Trust (Trust) jurisdiction. The Final EIS supplements the Final General Management Plan Amendment Environmental Impact Statement (GMPA EIS) adopted in 1994 by the National Park Service (NPS) for the Presidio. The Final EIS is prepared in compliance with the National Environmental Policy Act (NEPA), the Council on Environmental Quality's (CEQ) implementing regulations at 40 CFR Parts 1500-1508, and the Trust's own supplemental implementing regulations in 36 CFR Part 1010. Volume II contains a summary of the public and agency comments received on the Draft EIS, along with written responses to those comments. Volume I is the Final EIS. Volume III contains technical appendices related to and supplementing the Final EIS analyses in Volume I.

The Draft Presidio Trust Implementation Plan (Draft Plan or PTIP) and Draft EIS were circulated for public and agency review from July 25, 2001 to October 25, 2001, a period of 90 days. During this period, the Trust received over 3,000 comment letters, as well as oral comments provided at two public hearings, and at a public meeting of the Golden Gate National Recreation Area (GGNRA) Citizens' Advisory Commission. Original comment letters and transcripts are available for review at the Presidio Trust library, 34 Graham Street, in the Presidio.

The Trust carefully considered public comments, and made modifications to the text of the Draft Plan and Draft EIS as a result of those comments. Modifications included re-naming and revising elements of the Draft Plan, inclusion of a variant of that plan in the Final EIS and other modest adjustments to the text and analysis of the Final EIS. These changes are summarized in this introduction and explained further within the responses to comments included in Volume II of the Final EIS.

Following distribution of the Final EIS, and following the 30-day "no action" period required under NEPA, the Trust Board of Directors will consider adoption of a final plan. The Board's action could include, but is not limited to, adoption of the preferred alternative (the Final Plan), rejection of all

alternatives, and/or partial or conditional approval of a particular alternative. The Board's action, through a Record of Decision, will describe the scope and basis of the decision, the mitigations or conditions upon which it is contingent, and how the Final EIS will be used in subsequent decision making.

What follows is a summary of changes to the Plan itself (Section 1.1), followed by a summary of changes made in the Final EIS in response to public and agency comments on the Draft EIS (Section 1.2).

1.1 CHANGES TO THE PLAN

In response to public input, the Trust's preferred plan (Final Plan or Plan) has been renamed and reorganized. Now titled The Presidio Trust Management Plan: Land Use Policies for Area B of the Presidio of San Francisco, the revised document more clearly articulates its intended role as a general planning or policy framework that will be used to guide future, more specific planning and implementation decisions. Two salient facts must be borne in mind in reviewing and evaluating the Final Plan: (1) it will reduce development – shown as the square footage of buildings – to significantly less than the status quo; and (2) it will increase open space to substantially more than the status quo. Thus, the Final Plan removes development rather than fostering it. Changes in the Final Plan are summarized below.

1.1.1 VISION AND PLAN ORGANIZATION

The Final Plan document has been reorganized and many sections rewritten to provide greater clarity. Preservation of the Presidio's cultural, natural, scenic and recreational resources for public use is articulated clearly as the cornerstone of the Plan, and therefore its "vision." The preface, vision statement, summary, and introduction section of the Draft Plan have been combined and shortened into the "Overview" of the Final Plan.

Planning principles presented in Chapter 2 of the Draft Plan have been retained in what is now Chapter One of the Final Plan, or included within the land use, transportation, and infrastructure discussions in Chapter Two. The discussion of park programs originally presented in Chapter 3 of the Draft

RESPONSE TO COMMENTS

1. Introduction

Plan has been modified in response to comments and is now within the discussion of bringing people to the park in Chapter One of the Final Plan and the discussion of public land uses in Chapter Two of the Final Plan. Planning guidelines originally in Chapter 4 of the Draft Plan remain essentially unchanged in Chapter Three of the Final Plan. Implementation strategies originally in Chapter 5 of the Draft Plan have been updated and clarified in what is now Chapter Four of the Final Plan, which now more clearly articulates procedures for ensuring public input regarding future planning and decision making.

| Draft Plan (PTIP) Section | Location in Final Plan (PTMP) |
|---|---|
| Executive Summary, Vision Statement, Plan Summary, Chapter 1 – Introduction | Overview, Appendix B (Plan Background) |
| Chapter 2 – Planning Principles | Chapter One: Preserving and Enhancing Park Resources; Chapter Two: Park Land Uses, Transportation, and Infrastructure |
| Chapter 3 – Programs | Chapter One (“Bringing People to the Park” section); Chapter Two – (public use discussion) |
| Chapter 4 – Planning Districts: Concepts & Guidelines | Chapter Three – Planning Districts: Concepts and Guidelines |
| Chapter 5 – Implementation Strategy | Chapter Four – Plan Implementation |

1.1.2 CULTURAL AND NATURAL RESOURCES

The Trust’s commitment to preserve the Presidio National Historic Landmark District (NHLD or NHL District) has been strengthened in the Final Plan, and cultural resources have new prominence at the start of Chapter One. The text has also been modified to reflect execution of a Programmatic Agreement (PA) regarding compliance with the National Historic Preservation Act (NHPA). This agreement was signed in early 2002 by the Trust, the NPS, the California State Historic Preservation Officer (SHPO), the Advisory Council on Historic Preservation (ACHP), and two non-profit historic preservation organizations. A copy of the PA is included in Volume III of the Final EIS, Appendix D.

The Final Plan also discusses an agreement between the Trust, the NPS, and the Golden Gate National Parks Association (GGNPA) to study potential expansion of Crissy Marsh, and contains commitments that will avoid foreclosing potential expansion options for the duration of the study. Restoration of the Tennessee Hollow riparian corridor remains a clear focus of the Plan’s natural resources goals, and changes in land use or open space designations have been made to articulate the goal of restoring native plant communities immediately behind the Public Health Service Hospital (PHSH) and in the portion of the West Washington neighborhood where housing is proposed for removal.

1.1.3 HOUSING AND LODGING

In response to comments requesting greater specificity with regard to housing and lodging, the discussions of these issues have been clarified and additional detail provided. A map and numeric summary articulates where the Final Plan expects housing to be retained or removed, and instances where it may be converted to other uses or replaced. Where the precise number of residential accommodations provided in an area or provided via one means of replacement versus another cannot be determined with specificity, a generalized range is articulated. Quantitative, qualitative, and procedural constraints are provided for new residential construction, and the “no net loss” of housing policy described in the Draft Plan has been moderated along the lines suggested by several commentors such that the existing number of residential accommodations represents the maximum limit and not a goal.

A map in the Final Plan also shows preferred locations for lodging, and the text clarifies the Trust’s intention to reuse and rehabilitate historic buildings to provide lodging. The Plan clarifies that new construction associated with lodging will take the form of building additions or annexes that make the associated reuse of historic buildings functionally and financially feasible. In response to public comments, the maximum amount of potential new construction in the Crissy Field (Area B) planning district has been reduced from the number proposed in the Draft Plan.

RESPONSE TO COMMENTS

1. Introduction

1.1.4 BUILT SPACE AND NEW CONSTRUCTION

The Final Plan's square footage reduction goal has been revised to be a commitment to reduce existing built space from 5.96 million square feet to 5.6 million square feet or less over time. The role of new construction was also clarified in the Final Plan to state that non-residential construction would be primarily used to facilitate the effective rehabilitation and reuse of historic buildings, with limited additional replacement construction to be used to meet other Plan goals.

1.1.5 CULTURAL AND EDUCATIONAL PROGRAMS

The Trust's commitment to high quality programming for park visitors remains in place, and is articulated in Chapter One of the Final Plan. Chapter Two of the Final Plan breaks out the discussion of cultural programs from educational uses to provide greater specifics than were available in the Draft Plan regarding the use of building space for public uses. Clarification is also provided regarding the delivery of programs. The Plan's goal is to facilitate delivery of high quality programs by the NPS, the Trust, tenants, and other partners with expertise in program delivery. In response to comments, the Draft Plan's assumption of \$10 million annually to park programming has been reduced to a more modest goal (\$2 million, increasing to \$5 million over time), and the related goal of attracting funding for programs from philanthropic and other outside sources is clearly articulated.

1.1.6 FUTURE PLANNING AND DECISION MAKING

In response to general confusion expressed in comments regarding the role of additional planning and public input in future Trust decisions, the Final Plan clarifies these issues. Chapter Four of the Final Plan summarizes previous and ongoing implementation actions, and provides specific examples regarding the near-term planning and implementation activities that the Trust expects to undertake once the Final Plan is adopted. Because implementation activities that will be undertaken many years from now cannot be described in any detail, a generalized implementation timeline is provided, along with a discussion of overall priorities and strategy.

Before many future implementation activities are undertaken, they will often involve additional planning, environmental analysis, and public input. The nature of additional process is identified for specific classes of activities. For example, the Final Plan specifies that all new construction – beyond minor building additions – will require public input and agency consultation pursuant to NEPA and the NHPA, and summarizes what that will involve.

1.2 CHANGES TO THE EIS

In response to public comment and changes made to the Final Plan, the Final EIS was also revised as summarized below.

1.2.1 ALTERNATIVES

The Final Plan alternative has been modified to reflect changes from the Draft Plan, including the reallocation of some potential new building square footage from Crissy Field (Area B) to the Letterman district, and the re-designation of certain areas for restoration as native plant communities in the South Hills district. Land use assumptions have also been revised to reflect the potential location of infrastructure (e.g., a recycled water plant) in the Letterman district, and the potential location of Golden Gate Bridge maintenance facilities in the Fort Scott district.

At the request of commentors who suggested that a variety of new alternatives be analyzed, the responses to comments clarify the spectrum of alternatives captured within the range included in the Draft EIS, and the Final EIS incorporates a variant to the Final Plan Alternative. Designed to be as consistent as possible with a detailed Sierra Club proposal, the Final Plan Variant is more aggressive than the Final Plan Alternative with respect to building demolition, emphasizes the replacement of removed housing units within existing buildings, and provides for no new construction (i.e., none of the removed building space can be replaced).

A few land use assumptions associated with the No Action Alternative (GMPA 2000) have been corrected to reflect cultural/educational rather than office use of about 220,000 square feet in the Main Post planning district, reflecting the 1994 GMPA's identification of the Montgomery Street Barracks as the location of these kinds of uses.

RESPONSE TO COMMENTS

1. Introduction

1.2.2 ANALYSIS METHODOLOGIES AND ENVIRONMENTAL CONSEQUENCES

Analysis methodologies associated with the assessment of parking demand, visitation, and utilities were revised to provide more reasonable predictions of future conditions. In response to comments on parking issues, the Trust re-evaluated and modified methodology related to calculation of parking demand and adjusted proposed parking supply for all alternatives but Minimum Management. Specifically, assumptions associated with the Letterman Digital Arts Center (LDAC) project were revised to be consistent with the Letterman Complex Final EIS, adjustments were made to better reflect average demand for each planning district, and the demand associated with new residential units was adjusted downward to reflect the smaller size of future units. Other parts of the transportation analysis were also updated to use assumptions consistent with the Letterman Complex Final EIS, and to incorporate the minor adjustments in land use assumptions described above. The results of the transportation analysis were then used to inform adjustments to the air quality and noise environmental impacts analyses. These EIS sections were also modified in response to comments to include carbon monoxide modeling of an additional traffic intersection, and to provide additional background information on the Clean Air Act and noise sensitive areas. None of the changes provided significant new information, resulted in significant new impacts, or substantially increased the severity of an impact that was already identified in the Draft EIS.

The same is true with regard to changes in the visitation and utilities analyses in the Final EIS. In response to public comment, the proposed “cultural/educational” uses were separated and the visitor methodology updated as described in Response VE-1 and Section 4.4.4 of the Final EIS. In estimating visitorship, further clarity was provided by reporting park visitors, instead of all “visitor trips,” which include those associated with residences and office uses. In the utilities analysis, clarifications made in response to public requests include an expanded discussion of projected water demand and supply and additional quantification of effects related to wastewater. The analysis in Section 4.2.1, (Historic Architectural Resources and the Cultural Landscape), was also expanded in response to public comment.

1.2.3 FINANCIAL ANALYSIS

The financial appendix presented in the Draft EIS has been updated and expanded to include a number of sensitivity analyses. The updates reflect factual information that has become known or final since the distribution of the Draft EIS, including terms of the agreement with Letterman Digital Arts, Ltd., and Fiscal Year 2001 and 2002 budget figures (expenses and projected revenues). Updates also address changes to the alternatives made in response to comments and extension of the financial planning model from 20 years to 30 years to incorporate the financial implications associated with removal of Wherry Housing over that time frame. The changes related to alternatives included assessment of the Final Plan Variant and modification of assumptions regarding program expenses. In the updated analysis, the program expense assumption for each alternative has been modified to increase gradually from \$2 million up to the assumed goal for each alternative (e.g., \$5 million for the Final Plan Alternative), rather than assuming an immediate increase in early years. These changes are explained in more detail in Volume III of the Final EIS, Appendix K.

The financial analysis was also expanded to include a number of new sensitivity analyses associated with the No Action Alternative (GMPA 2000), the Final Plan Alternative and Final Plan Variant, and the Cultural Destination Alternative. These alternatives were selected for the sensitivity analyses because they together represent the outer bounds of the full range of alternatives plus a mid-range alternative in terms of overall square footage, capital and operating expenses and other issues. The sensitivity analyses provide information that was required to respond to comments, assessing the financial performance of the alternatives when certain assumptions are changed, such as the level of operating expenses. The new sensitivity analyses complement the one associated with declining rents described in Draft EIS (Appendix J) and are presented in their totality in Appendix K of the Final EIS. The sensitivity analyses demonstrate the limitations of any long-term financial forecast, indicating widely divergent outcomes when analysis assumptions are modified. These limitations are clarified in the text of the analysis.

RESPONSE TO COMMENTS

1. Introduction

The land use assumptions tables in the financial analysis have also been clarified. One table now summarizes land use assumptions for each planning district in every alternative. These assumptions are also presented in the environmental consequences (land use) section of the EIS, and form the basis of all EIS impact analyses. Another table summarizes the amount of potential new construction assumed in each planning district in each alternative. The data for the Final Plan Alternative are consistent with quantitative limits set forth in the Plan document, and represents the maximum potential rather than proposed amount of new construction. Finally, the table summarizing the residential program for all alternatives has been revised to clarify assumptions regarding the number of units removed (whether through demolition or conversion) and the number replaced (whether within existing buildings or new construction). The housing goals in the Final Plan fall within the assumptions previously embedded in the Draft EIS analysis and carried forward in the Final EIS.

RESPONSE TO COMMENTS

1. Introduction