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ATTACHMENT 2

REPORT ACCOMPANYING THE ROD

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In July 2001, the Trust released for public comment the *Draft Presidio Trust Implementation Plan and Draft Environmental Impact Statement* (Draft Plan and Draft EIS). Based upon public comments received, the Trust made changes to the Draft Plan and corresponding modifications to the Draft EIS, and in May 2002 released the *Final Environmental Impact Statement* (Final EIS) and proposed *Final Presidio Trust Management Plan, Land Use Policies for Area B of the Presidio of San Francisco* (PTMP or Final Plan). The Trust carefully considered, evaluated, and responded to all comments received on the Draft EIS, and those responses are found in the second (Volume II: Response to Comments) of three volumes of the Final EIS. This Report Accompanying the ROD considers and addresses further comments received by the Trust during the “no-action” period between public release of the Final Plan and Final EIS and the Board of Director’s decision adopting the PTMP.

I. EXTENDED NO-ACTION PERIOD FOR THE FINAL EIS

The Trust released the Final EIS together with the proposed Final Plan document at a public meeting of the Trust’s Board of Directors on May 21, 2002. The Trust held a second public Board meeting on June 13, 2002, to answer questions about the Final Plan and EIS. At the public meetings, the Trust announced its intention to make a final selection decision at the next regularly scheduled Board meeting on July 11, 2002. The U.S. Environmental Protection Agency (EPA) published a Notice of Availability of the PTMP Final EIS on May 24, 2002 (67 FR 36592), starting the 30-day “no-action” period (i.e., until June 24, 2002) required by the National Environmental Policy Act (NEPA) regulations. See 40 C.F.R. § 1506.10(b)(2).

A number of reviewers (the San Francisco Board of Supervisors and five other organizations and individuals) each sought additional time to review the information in the Final EIS and requested that the Trust extend the no-action period beyond July 11, 2002, the date the public expected final action.¹ The Trust deferred action at the July 11th Board meeting. The deferral provided more than three months of public review, well in excess of NEPA’s 30-day minimum requirement and the 90 days requested by some reviewers. The Board finalized its decision by voting to adopt this ROD, which decision was made effective by the signature of the Trust’s acting Executive Director.

II. COMMENTS RECEIVED AFTER RELEASE OF THE FINAL EIS

The Trust received a variety of public input during the no-action period for the Final EIS. Trust staff prepared this report to summarize the nature of the input received; and to respond to or clarify any new issues raised. Many of the comment letters on the Final Plan are generally favorable and express support for the Final Plan and the changes the Trust made between the Draft and Final Plan. To the extent letters and comments raise concerns, many of the same points were suggested in comments on the Draft Plan and EIS, and the Trust has already responded in Volume II of the Final EIS. Although several letters ask the Trust to consider modifications to the Final Plan, these comments raise no new issues requiring modification of the proposed Final Plan or the Final EIS.

During the 3-month no-action period, the Trust received 35 written comment letters and emails from 4 government agencies, 19 organizations, and 12 individuals. About half of the written comments — from a range of reviewers including government agencies, neighborhood groups, cultural preservation organizations, housing advocates, individuals, and the GGNRA Advisory Commission — supported or expressed overall favorable views of the proposed Final Plan. Of those written comments expressing general support for the Final Plan, almost half also asked the Trust to consider reinforcing certain aspects of the proposed Final Plan or to consider additional modifications to the Plan that would, in the commenter’s view, strengthen its framework. Other reviewers remained generally neutral or silent on the

¹ The following five organizations and individuals submitted written requests for additional time to review the Final EIS: Natural Resources Defense Council, Sierra Club, Pacific Heights Residents Association, Mr. Donald Green, the San Francisco Board of Supervisors, and the San Francisco Bay Conservation and Development Commission.

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proposed Final Plan but made general comments about the direction of the Presidio or the Trust, while a few expressed overall negative views or stated their preference for the Trust to select an altogether different plan.

In addition, the Trust received oral comments from 55 speakers at the June 13, 2002 public Board meeting on the Final Plan. Nine of these speakers or their organization also submitted a written comment letter generally reflecting the oral comments. Further support for the planning process and the Trust was expressed by commenters at the May 21, 2002 public meeting where the Trust presented the proposed Final Plan. Representative comments in support of the Final Plan, both statements submitted in writing and verbal statements, are excerpted below. Of the 55 commenters at the June 13th meeting, just under half (26) expressed general support for the plan, seven were negative or not in support of the Plan and 22 offered more neutral statements that could not be construed as positive or negative of the Plan overall. Most of the topics and issues raised by these reviewers have been previously raised in comments on the Draft Plan and EIS, and many were responded to orally at the public meeting.

A. REPRESENTATIVE COMMENTS IN SUPPORT OF THE FINAL PLAN

- “The GGNRA Advisory Commission ... commends the Trust for the plan’s overall comprehensiveness, quality, and responsiveness to public comments on PTIP. The plan properly addresses the serious challenges the Trust faces in its primary mission of caring for and enhancing the Presidio’s natural, cultural, scenic and recreational resources, and meeting its congressional mandate to be self-sufficient by 2013. We are pleased that the PTMP adopted many of our Commission’s recommendations.” (Golden Gate National Recreation Area Advisory Commission; letter dated July 2, 2002)
- “Following the National Park Service’s review of the Final Presidio Trust Management Plan (PTMP) and the Final Environmental Impact Statement (FEIS), we find there is much to be pleased with in the new plan. We understand the Trust’s financial reality, and it is a meaningful consideration. Balance is key and this plan appears, overall, to come closer to a balance wherein income generation is not for any end of its own, but for purposes of preserving the Presidio as part of a national park — a place for the enjoyment of this and future generations. ... We have reason to be optimistic about this plan, and believe it provides a good basis to move forward. We are pleased to note that it has incorporated many positive changes that respond to the major concerns voiced in our comments on the draft PTIP.” (National Park Service; letter dated July 11, 2002)
- “In our review of the [Final EIS], EPA found that the document adequately addresses the issues we raised. Modifications to the [Draft EIS] are clearly identified, and changes to the project based on prior feedback from EPA, other agencies, and the public are thoroughly discussed. The revised project reduces the impacts to the environment, and is responsive to the public’s concerns regarding protection of the natural, cultural and historic resources within the Presidio. The Final Plan provides a good balance among the competing visions for Area B of the Presidio.” (The U.S. Environmental Protection Agency; letter dated June 24, 2002)
- “[The National Parks Conservation Association] would like to recognize the notable positive strides ... reflected in the PTMP. The Plan’s tone expresses a stronger commitment to the preservation of the historic, cultural and natural resources that make the Presidio such a spectacular place. In your commitment to preserve the Presidio National Historic Landmark District (NHL) status, in your prioritization of activities that will restore Tennessee Hollow, and in taking steps toward enhancing Crissy marsh, we commend you. NPCA is further appreciative of the increased specificity through greater detailing of the amount of potential new building space and, in cases, building uses in various districts of the park. ... We are pleased to find that the PTMP contains a lower level of funding for programming. The stated intent to encourage tenant contributions and work with the National Park Service... is another positive step. (National Parks Conservation Association; letter dated August 15, 2002)
- “The Cow Hollow Association represents the interests of approximately 1,100 residential units in the area bounded by Lyon, Pierce, Greenwich and Pacific [Streets]. We appreciate the great effort put forth in your recently released ‘Presidio Trust Management Plan’ and ‘Final Impact Statement.’ We feel that both the tone of the changes made in

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response to public comment as well as the amount of detail provided make for a much more understandable and acceptable plan.” (Cow Hollow Association; letter dated July 9, 2002)

- “The Planning Association for the Richmond (PAR) would like to express our general approval of a number of the changes reflected in the revised Presidio Trust Management Plan (PTMP) issued in May 2002. We would also like to extend our appreciation for the Trust’s consideration of the public’s input during the preparation of the PTMP.” (Planning Association for the Richmond, letter dated July 3, 2002)
- “As the Presidio Trust nears the end of a two-year planning effort, I would like to commend you and your staff for being open and responsive to National Trust [for Historic Preservation] concerns regarding protection and reuse of the Presidio’s historic resources. As we had hoped, the PTMP clarifies and expands key themes introduced in the draft plan, expressing a stronger commitment to adaptive reuse of historic buildings, delineating a full range of alternatives to be considered before demolition, and providing a meaningful role for the public in decisions that could adversely impact historic resources. We are especially pleased by the assurance that the Presidio Trust will preserve the character and integrity of the NHL District. We further applaud the Presidio Trust for its willingness to work with others in the joint review of projects under the National Historic Preservation Act and National Environmental Policy Act.” (National Trust for Historic Preservation; letter dated July 1, 2002)
- “On behalf of the California Preservation Foundation, I am writing in strong support of the new direction proposed in the [Presidio Trust Management Plan] relative to historic preservation, in particular: the priority given to the National Historic Landmark District’s preservation and the emphasis on the National Historic Landmark District as the primary determiner of historic resources at the Presidio[; and t]he commitment to preservation and reuse of the historic resources at the Presidio, as well as more emphasis given to consideration of the reuse of existing structures over demolition and new construction.” (California Preservation Foundation; letter dated August 19, 2002)
- “The California Heritage Council wishes to thank the Presidio Trust Board for its final version of the Presidio Trust Management Plan. It reflects a long and fair process of community deliberation. Congratulations on the effort and vision. We appreciate that it cannot be easy to simultaneously manage the Presidio both as a park and as a real estate enterprise. While we concur with the majority of the Plan, ...vigilance on everyone’s part will be a continuing requirement.” (California Heritage Council; letter dated June 13, 2002)
- “I would like to take this opportunity to thank the planning staff for their fine effort to take into account our comments to the previous Presidio Trust Implementation Plan (PTIP) and the Draft Environmental Impact Statement (DEIS). We believe our questions and concerns about an open and public review process, the programmatic agreement, historic resource protections, and planning [have] been noted.” (San Francisco Architectural Heritage; letter dated June 13, 2002)
- “San Francisco Beautiful (SFB), a nonprofit membership organization founded in 1947 ... [has] reviewed the Final PTMP and SFB is pleased with many of the changes the Trust made to the plan. We applaud the enhanced commitment to preservation of resources, sustainability and public input; the increased emphasis on avoiding adverse impacts on the Presidio’s integrity as a National Landmark Historic District; the cap of 1654 housing units; the housing at the Public Health Service Hospital; and the siting of replacement housing at north Fort Scott and west Letterman. We note the PTMP’s greater specificity for sites and structures for public lodging. ...we agree with greater reliance on tenants and other organizations to provide public programs, as well as to the reduction in Trust funding for programming. SFB is pleased with the moratorium on development around the tidal marsh at Crissy Field and the Trust’s commitment to study the expansion of the tidal marsh The Trust has shown great responsibility by continuing to insure that adequate funds are available for capital improvements. The final PTMP is responsive to recommendations from SFB for all of the aforementioned items. Thank you for embracing these important concepts.” (San Francisco Beautiful; letter dated June 13, 2002)
- “I believe that the revised plan is an excellent framework for balancing the demands of preservation of the natural and built resources and the fiscal demands of operating the park. The revised plan and the outcome of the public

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process have addressed many of the public concerns raised about the General Management Plan. The revised square footage allocation of approximately 1/3 for public uses, 1/3 for housing and 1/3 for offices is a commendable distribution to promote the balance originally envisioned for a sustainable community within a National Park.” (Leddy Maytum Stacy, Architects; letter dated June 12, 2002)

- “We strongly support the efforts of the Presidio Trust to make the Presidio a self-sufficient, multi-use park. Our most important concern is to ensure that the Presidio does not lose any housing in its projected plan. While environmental and congestion concerns should not be underestimated, housing remains the most important issue facing San Francisco and the Bay Area. As the Presidio creates new jobs, it is important that housing units are provided so as not to worsen our existing housing crisis. We commend the Trust for its excellent work thus far and support your innovative efforts to maximize the uses of the park.” (The San Francisco Housing Action Coalition; letter dated June 3, 2002)
- “The plan has been strengthened as the Trust listened carefully and selected the strongest suggestions from the cacophony of voices and visions which bombarded it. The Trust has been a responsive public body.” (Michael Alexander; letter dated July 8, 2002)
- “I am writing to express my strong support for the Presidio Trust Management Plan. We are all working to preserve, not just open space and a park in the usual sense, but a part of our physical history — a developed site that has played a unique role in the history of the West and of San Francisco. I strongly support the vision contained in the Management Plan. It is the next logical step in the process that was started with the 1994 General Management Plan.” (Jim Lazarus; letter dated June 27, 2002)
- “I think we have to accept as citizens that this is an unparalleled opportunity with absolutely no model in the world to follow. ...I want to urge San Franciscans to get going — move ahead with it and support those leading the way in this fantastic opportunity. I want to point out that many of us here speaking will probably not be around in 30 years when it’s finished. And the San Francisco for those generations is what we are creating, not to take care of those of us who are here now.” (Architect and San Francisco Resident, John Field; oral comment at June 13, 2002 public hearing)
- “I’ve been following the process for probably as many years as most in this room, and I’d like to join those who are throwing bouquets at the staff of the Trust. I think after 18 years, as I counted, of unrealistic approaches to the problem, the present preferred alternative is the most doable and, I think, satisfactory possible compromise between many alternatives.” (Whitney Hall; oral comment at June 13, 2002 public hearing)
- “So I wanted to acknowledge the fact that you have made our lives a little bit better in the natural world because of your increased commitment to[the Tennessee Hollow] watershed and to the Crissy Marsh study. Thank you very much — that was really much needed and appreciated. (Member of the GGNPA and Presidio Volunteer, Jan Blum; oral comment at June 13, 2002 public hearing)
- “After reading through the plan and the EIS I want to compliment the Trust, the Board and the staff on listening to us, on responding and on making some important changes. I think the plan is better.. You’ve obviously listened. It’s a good process and we appreciate that. You’re also committing to two of the three major restoration opportunities....[a]nd I applaud you for doing that and sticking with that commitment.” (San Francisco Resident and Presidio Volunteer, John Holding; oral comment at June 13, 2002 public hearing)
- “...in a public planning process people are more likely to express their disagreement with you than their support. ...So tonight instead of watching the Stanley Cup Finals, I came to tell you that I support the plan that you’ve put together. I think you’ve done a masterful job at balancing ... conflicting needs and have done that while being very sensitive to the public comment that you have received.” (Planner and Environmental Consultant, Mara Feeney; oral comment at June 13, 2002 public hearing)

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- “I spent three hours, a delightful three hours, this afternoon at the Crissy Café reviewing the two documents, the comments and responses and the Management Plan. And I am impressed.” (Mary Anne Miller for San Francisco Tomorrow; oral comment at June 13, 2002 public hearing)
- “I’m here to really support the document that’s been presented. It was very clear from Congress what our challenge was in front of us. And I think over the past couple of years that we’ve been able to pull together and create a solid document. I think the document has gone way further than simply coming up with a way to achieve self-sufficiency...in presenting so many opportunities to really bring people into the park and create perhaps a best use maximization for the utilization of this space.” (San Francisco Resident and “frequent user of our park,” Anson Snyder; oral comment at June 13, 2002 public hearing)

B. REQUESTS FOR FURTHER MODIFICATIONS TO THE FINAL PLAN

A great national park – Incorporate language in PTMP that the Presidio will be kept as a great national park.

Response: The Trust wholeheartedly agrees with the sentiment of the suggested change, and the PTMP affirms the Trust’s commitment to make the cornerstone of the Trust’s vision the character of the Presidio and the preservation, protection, and enhancement of its cultural and natural resources. As the policy concept is implicit in the Plan vision, the Trust is declining to expressly amend the language of the Plan. Nevertheless, statements regarding the preservation of the Presidio as a great national park have been incorporated into the ROD.

Additional Future Increase in Open Space – Include a long range goal to “make the Presidio a demonstration and education site for how open space with high biologic values can be conserved and maintained in urban areas.” Add language to the Final Plan that leaves the opportunity open for a future Board, as financial conditions permit, to remove additional structures that are now non-historic to create further unfragmented open space without having to first amend the PTMP.

Response: The Trust carefully considered the proposal to expressly add the suggested language to the Plan, but is declining to add the suggested text because, as above, the concept is implicit in the more specific policies and guidelines of the Plan itself. Language has been added to the ROD to affirm the concept of making the Presidio a demonstration and education site (Section II) and to explain why the PTMP’s balance between cultural and natural resource protection should not be drawn differently at this time. See ROD Section IV.A.11.

Modify the Vision – Modify the language of the vision statement to delete the language concerning “a purpose beyond itself” and substitute alternate language.

Response: Reviewers apparently interpreted the text about the Presidio not having a “purpose beyond itself” as preclusive. It is not. The PTMP vision does not preclude a higher purpose for the Presidio; the sentence suggested for deletion simply indicates that the Trust does not wish to require that the Presidio achieve a higher purpose, such as addressing the world’s most critical problems. This issue is more fully explained below (Section B. “Vision”). The Trust agrees with the concepts suggested in the substitute language. All of these concepts are embodied elsewhere within the text and policies of the Plan, and are included within the ROD.

Planning District Guidelines – Commit to planning and design guidelines for each Planning District to ensure that new construction and landscape rehabilitation will not have an adverse or cumulative effect on the NHLD status.

Response: The PTMP already satisfies the reviewer’s suggestion. The Trust is committed to the preservation and protection of the NHLD as stated clearly throughout the PTMP. The Planning Principles in Chapter 2 and Planning District Guidelines in Chapter 3 of the PTMP are derived from the relevant Secretary of Interior’s Standards and will set the framework for the design of any new construction. Furthermore, the PTMP commits to public involvement and further environmental review of new construction projects, and these projects will be reviewed by the parties to the

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Programmatic Agreement under Stipulation X. procedures. These protections taken together will assure that new construction will not impair the NHLD status.

Extended Moratorium – Extend the moratorium for new construction and long-term leasing at Crissy Field (Area B) “until a decision is reached” for the Crissy Marsh expansion.

Response: The Trust recognizes that the two-year duration is an estimate. Nevertheless, the Trust must bear in mind the reality of its financial deadline, and is therefore not amenable to restating the Plan as an open ended leasing moratorium commitment. The Crissy Marsh study called for in the PTMP will provide the basis for a preferred plan, and may provide the rationale for extending the moratorium in the future.

Specify all future plans – Identify subsequent area, sub-area and topical planning efforts.

Response: The Trust cannot know with specificity each and all of the future planning efforts it will undertake or their precise scope, as explained in response to comments on the Draft Plan and EIS (Final EIS Volume II, Response to Comment PI-9 (pages 4-51 through 4-52)). A discussion of both short-term and long-term planning and implementation actions and strategies is contained in PTMP Chapter 4, pages 122 through 127.

Tenant selection criteria and process – Refine and allow public review of the tenant selection criteria. Commit to an NPS role in tenant selection decisions.

Response: The tenant selection criteria are set out in the Plan and have been fully reviewed and commented upon in this public process. The criteria reflect a wide range of interests, both financial and programmatic, and will allow the Trust to select a diverse mix of tenants. Area B of the Presidio is within the Presidio Trust’s jurisdiction, and NPS does not have a role in tenant decisions, just as the Presidio Trust does not have a role in tenant decisions elsewhere in the GGNRA under NPS’s jurisdiction.

Reaffirm opportunities for public review – Reaffirm that the PTMP is a long-term policy document rather than an implementation plan and that public review will be provided before future actions are taken in each Planning District. Modify the public involvement chart to provide for more public meetings.

Response: The Trust received many comments on the Draft Plan expressing concerns about the public’s role in future implementation decisions about the Presidio. In response, the Trust provided much greater specificity about the public’s role and made a clear commitment in the Final Plan to provide the public with meaningful opportunities for public review and input for important Trust decisions. This commitment is clearly expressed in PTMP Chapter 4, pages 126 through 131 and is reiterated in Section VII of the ROD setting forth the Trust’s decision. Section VII of the ROD also makes clear that the PTMP is a long-term policy document and land use framework rather than a specific implementation plan. PTMP Figure 4.3 indicates that there will be many opportunities for meaningful public input — often including formal public meetings, review, and comment — before important Plan implementation decisions are made. As indicated there; in EIS Volume II, Response to Comment PI-2 (pages 4-46 to 4-47); and in the ROD Section VII, the actual process of involving the public will vary depending upon the potential environmental effects of the proposal.

Decrease overall built space – Lower the total allowable square footage by compromising between the Final Plan Variant and the Final Plan.

Response: As described in the ROD, the Trust believes the Plan strikes the appropriate balance between resource protection and financial security and open space and developed space, and is therefore declining to further reduce the built environment in the Presidio beyond what is called for in the PTMP.

Preclude new housing construction – Delete the aspect of the Final Plan that permits consideration of new construction to provide housing units.

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Response: The Trust addresses in the ROD the basis for rejecting this suggested change to the PTMP. See ROD Section IV.A.6. and the discussion of the Final Plan Variant under ROD Section IV.B. Housing units, the most stable and reliable source of revenue for the park, are being removed to achieve other resource goals under the Plan. Relying solely upon subdivision and conversion of existing space to replace lost units may become economically infeasible and may jeopardize the protection and integrity of individual historic structures. The Trust therefore considers the option for new construction of housing units to replace those removed to meet other goals or to provide sufficient units to meet demand to be a prudent option. The Plan places sufficient constraints on new construction to ensure the protection of the Presidio’s NHLD status and the integrity of its other resources (e.g., natural, visual, aesthetic).

Public Health Service Hospital – Modify the square footage limits of the PSHS Planning District to reflect the possibility that the hospital’s wings could be removed and not replaced.

Response: The square footage limits of the Final Plan need not be modified to permit consideration of the reviewer’s suggestion — removal of the hospital’s wings without replacement. The maximum demolition allowance of 130,000 square feet (sf) would accommodate removal of the non-historic wings. The planning concept for the District allows replacement of built space that is removed, but does not require it. Note that the maximum building area allowance in the District is “up to” 400,000 sf, the amount that currently exists, but “up to” implies that the total may not be reached.

C. COMMENTS RELATED TO TOPICS/ISSUES ADDRESSED IN THE PLANNING PROCESS

Some comments raised by those who reviewed the Final Plan address issues that will become relevant only during the future implementation of the Plan and may not therefore be specifically addressed below. These commenters points of view will be retained and considered as the Trust moves forward with implementation of the Plan. The majority of issues raised are summarized with references to relevant sections of the Plan and EIS.

Vision

Two reviewers scrutinized the Final Plan’s vision statement, saying it “falls short” and criticizing it as “myopic.” A reviewer claims the vision lacks an “unambiguous statement of what the Trust intends to create at the Presidio” and claims the Plan lacks “justification for abandoning the GMPA vision.”

Response: The Final Plan vision and an explanation of how and why it differs from the GMPA vision is at pages iv-v of the PTMP and Final EIS Volume II, pages 4-55 to 4-61 (particularly Responses to Comments VI-1 and VI-6). See also Final EIS Volume II, pages 4-319 to 4-321, particularly Responses to Comments TS-1 and TS-2 concerning mission-related tenants. Also see ROD Section IV.A.1.

Perhaps no topic has raised greater passion during the 12 years of Presidio planning than the debate over what is the desired “purpose” for the Presidio. Those who object to the Final Plan’s vision believe the nature and mission of the tenants who fill the Presidio’s buildings should define its purpose, and would like the Trust to define a vision centered around a collective mission for Presidio tenants. Under this view, the Trust should select tenants whose collective mission would create a “global center” for solving important world problems; this would be the higher purpose of the Presidio and “what the Presidio would become.” This higher purpose would presumably absolve the “taint” these reviewers believe financial considerations or the marketplace would place on the future implementation of the Plan (One reviewer states: “If the market determines the purpose, [the Presidio] is a marketplace.”) As much as some want the “global center” vision to define the Presidio, the Trust need not adopt it; Congress did not make this higher purpose part of the Trust’s charge, and the Trust is not adopting the GMPA vision because it could so constrain tenant selection that it would put in jeopardy the success of the financial requirements set by Congress.

The Trust is not suggesting that leasing to GMPA-type tenants is unwanted, simply that to focus leasing on a single policy principle would make the Trust’s financial challenge that much more difficult. There is no compelling reason to further burden what is already a formidable financial challenge. The price of failure is high, and the Trust is not willing

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to allow a policy goal — one that was neither mandated nor embraced by Congress — to take precedence over the Trust’s central mission of preserving the Presidio as a great national park site.

Tenant Selection

A few reviewers criticize the Final Plan for including no plan or procedures for outreach to GMPA-type tenants or other measures to facilitate their ability to occupy Presidio space. Another reviewer reasserts, without support, that the Trust can over time find the overlap between market rent and mission-enhancing tenants and could, if it tried, fulfill the GMPA vision of leasing all remaining space to mission-serving tenants. Another reviewer asserts that the ability to contribute to the rehabilitation of the Presidio’s historic buildings should not be a relevant factor in selecting tenants.

Response: The Trust Act tenant selection criteria in § 104(n) is directly contrary to the reviewer who claims that ability to contribute to rehabilitation of the Presidio’s historic structures is irrelevant in tenant selection. Marketing Presidio buildings presents challenges not attendant to other locations in San Francisco. The Trust does not agree that seeking such tenants assures that they will lease Presidio space. A full discussion of tenant selection and tenant diversity is at PTMP pages 133-135. It may be helpful to read these points in the context of the discussion concerning Financing the Park at PTMP pages 114-122. A complete response to comments concerning tenant selection is in Final EIS Volume II, pages 4-319 to 4-327. Also see ROD Section IV.A.7.

Biology

Reviewers express views at both extremes of the biological resources debate. One reviewer says “restoration of natural resources” is the single greatest threat to the Presidio and its historic past. Another says the Trust should not add open space at the expense of removing Wherry Housing, which is an important revenue source. Other reviewers say that the Trust should emphasize habitat restoration and expansion and make a clear commitment to ecological restoration.

Response: These views reflect the range of opinion received in response to the Draft Plan and EIS. The Trust’s Final Plan reflects its obligations under the Endangered Species Act not to jeopardize the survival of listed species (see ROD Section VI.B.3), and the decision to remove Wherry Housing over time is its commitment to that obligation. A future planning effort will look at the different opportunities and constraints involved in the restoration of Tennessee Hollow, and that planning effort will further define the details of the commitment to restore Tennessee Hollow. Different reviewers would strike a different balance between the protection of cultural versus natural resources at the Presidio; nevertheless, the Trust has considered all views and believes the Final Plan strikes the correct balance between the preservation, protection and enhancement of natural and historic resources. See ROD Section IV.A.11.

Crissy Marsh

Reviewers opinions are similarly split concerning the future of Crissy Marsh. One reviewer is concerned that the Plan does not commit to use Area B land or to demolish the Commissary for expansion of the marsh if that is the best solution. To fail to commit to expansion would be to squander monies already spent. Another reviewer on the other side of the issue calls for retrenchment on the marsh expansion (“The Crissy Field Marsh expansion should likewise be restudied carefully.... that project has not been a success. ... and there is no reason to enlarge it now at the expense of other uses.”)

Response: The PTMP commits to the long-term health of Crissy Marsh, but does so while also acknowledging that the means to achieve the policy goal requires consideration of tradeoffs and a wide range of implementation options that were beyond the scope of PTMP. The Crissy Marsh Expansion Technical Study committed to in PTMP will identify a broad set of potential actions within Area B as one reviewer urges, and will provide sufficient technical information to inform subsequent decision-making as the opposing reviewer urges. The Trust recognizes the strong opinions on both sides of the issue and has chosen to use the mechanism of a collaborative technical study to identify and assess the benefits and impacts of different options using a more complete array of relevant decision-making criteria than have been previously available. These study criteria are summarized and further response to the issue of Crissy Marsh

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expansion is in EIS Volume II, Response to Comment BR-3 (page 4-143). The Plan's commitments concerning the marsh are set out in Chapter 1, Planning Principle 8 (page 20).

The Plan's reference to reuse of the Commissary as museum space reflects the reality of the current situation wherein Congress has requested that the Trust and NPS collaborate to study the feasibility of establishing a Pacific Coast Immigration Museum at the Commissary or at another site. The study is underway but in its preliminary stages. Furthermore, the location of the Commissary is prominent and accessible and the building itself is in fairly good condition making consideration of its reuse sustainable. See EIS Volume I, Response to Comment PR-18 (pages 4-215 to 4-216) and NC-3 (page 4-165 to 4-166).

Historic Resources

Several reviewers ask the Trust to reaffirm the commitment to protection of the NHLD. One is concerned about how the feasibility of individual rehabilitation and reuse projects will be determined. Another is concerned that budget cuts in cultural programs will have an adverse effect on monies available for preservation of historic structures. Still another asked for a comprehensive maintenance plan to stabilize historic structures and protect them from further deterioration.

Response: PTMP articulates a firm commitment to protect the historic character and integrity of the NHLD. PTMP page 5. The same commitment is carried forward into the ROD (Section II and Section IV.A.1.).

With regard to determining feasibility of rehabilitation of historic structures, no prescriptive approach can be developed that would apply to all circumstances. Instead, these determinations will be based upon the specific factual circumstances, such as the building's condition, the cost to rehabilitate it, the ability to reuse the building, and the economics of doing so.

The reviewer concerned about cuts in the Trust's program budget is confusing budget dollars targeted at public programs such as exhibits and public events with capital dollars needed to rehabilitate historic buildings consistently with the Secretary of Interior's Standards. In Fiscal Year 2001, the level of expenditure for park programs was at a baseline of approximately \$2 million. The Trust hopes to increase this amount over time to \$5 million. The Final Plan sets a goal of allocating \$5 million annually in Trust revenues, supplemented by outside sources (including philanthropy), to support Presidio programs in the future. This goal is expected to be achieved over time, and at the start the Trust will sustain only a baseline level of funding for park programs, while it places higher priority on funding protection and preservation of park resources, including making the necessary capital investments in rehabilitation of historic structures to prevent further deterioration and to preserve them.

Finally, with regard to stabilizing historic structures, the Trust plans to begin an ongoing cyclical maintenance program to stabilize and protect historic structures from unchecked deterioration that could impede reuse potential.

Housing

As with other issues, reviewers have opinions at different ends of the spectrum on a variety of housing issues. Some reviewers continue to call for no new construction of housing units to replace units removed to achieve the Plan's resource protection goals. Other reviewers urge the Trust to maintain housing supply within the park at its current level. Similarly, with regard to removal of Wherry Housing, reviewers again diverge, some calling for its removal as the best option for enhancing endangered species habitat while others urge the Trust not to remove Wherry or to keep it as long as possible because it is costly to remove, expensive to replace, and provides substantial revenue.

Response: Reviewers suggestions tend to be at the extremes (we do not feel that the use of an arbitrary ratio of 'jobs/housing balance' or a policy of 'no net housing loss' has any place in a National Park."). Again, as with other issues, the Trust believes the PTMP strikes the best balance among the differing opinions and competing interests on housing issues. The reasons for selecting the housing policies and parameters of the Plan are set forth in the ROD at Section IV.A.6. Much more detailed response to these housing issues, all of which were raised previously in comments

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on the Draft Plan and EIS, are set forth in the Housing responses in EIS Volume II at pages 4-173 through 4-196. A full discussion of jobs/housing balance and no net loss of housing in Response to Comment HO-1 (pages 4-173 to 4-175). Responses concerning construction of new housing units are specifically addressed in Responses HO-7 through HO-10 (pages 4-181 to 4-187) with additional discussion in Response to Comment NC-1 (pages 4-163 to 4-165) and NC-4 (page 4-166). Responses concerning the removal of Wherry Housing are set forth in detail at Responses HO-11 and HO-12 (pages 4-187 to 4-190).

New Construction

Reviewers continue to express opinions about the effect of potential new construction on the NHLD. Some reviewers disfavor any potential for new replacement construction on the basis that new construction is not necessary for financial viability.

Response: Reviewers continuing concerns are unfounded as the Final Plan and now the ROD make a firm commitment to protection of the NHLD. The Plan establishes quantitative, qualitative, and procedural constraints to ensure that any new construction proposed in the future is undertaken in a manner that is consistent with the NHLD and protective of the resources and qualities that make the Presidio a special place. For further response to reviewers concerns, see in particular EIS Volume II, Section 4.17 Responses to Comments on New Construction and in particular, Responses NC-1 (pages 4-163 to 4-165) and NC-7 (pages 4-167 to 4-169). See also ROD at Section IV.A.2.

Lodging

One reviewer is stridently opposed to lodging within the park, claiming that the tradeoffs have not been addressed.

Response: The Final EIS fully identifies and analyzes the potential environmental effects of providing lodging within the mix of uses for the Presidio. The Trust has fully considered these potential effects and with mitigation, the land use mix under the PTMP, including limited lodging opportunities, will not result in significant environmental effects. As a policy matter, the Trust disagrees with the reviewers point of view, and for the reasons set forth in Response to Comment LO-2 (page 4-198) and in the ROD at Section IV.A.8, the Trust has chosen to include lodging within the potential mix of uses under the PTMP.

Alternatives

The Pacific Heights Residents Association again expressed a desire for the Trust to select the GMPA 2000 Alternative on the grounds that it achieves self-sufficiency without giving up the vision of the Presidio becoming a global center for addressing critical world problems. It also stated a preference for the Final Plan Variant because more demolition is considered cost effective and minimizing new construction would in its view minimize the circumstances in which the Trust would have to accept ground rent instead of building rent. Cow Hollow Neighbors Association prefers the Final Plan Variant instead of the PTMP because in its view new construction is not necessary for financial viability.

Response: As set forth in the ROD, the Trust has chosen not to select the GMPA 2000 Alternative on the basis of many factors other than financial reasons alone. Although some reviewers would prefer that the Trust adopt the alternatives that embrace the GMPA vision, the Trust has chosen not to so constrain the Plan or its future leasing opportunities. The ROD sets forth the rationale for not adopting the GMPA 2000 Alternative (ROD Section IV.B.) or the vision of the 1994 GMPA (ROD Section IV.A). Additional discussion of this rationale is set out above in this attachment (Section II. B.) under the discussion “Vision.” Similarly, the Trust believes the reviewer’s rationale for favoring the Variant — because it precludes new construction and limits ground leasing — is misguided. The Trust discusses these factors in the ROD as among the bases for selecting the Final Plan Alternative over others.

PTMP Financial Planning Model – The Sierra Club and the City and County of San Francisco urge the Trust to “have an independent examination and verification” of the PTMP financial planning model used in the EIS to compare planning alternatives.

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Response: In an October 2001 GAO Report entitled “Significant Progress Made in Preserving the Presidio and Attaining Financial Self-Sufficiency,” GAO recommended that the Trust attest the PTMP financial model according to the standards of the American Institute of Certified Public Accountants Statements on Standards for Attestation Engagements.” Two reviewers called for the same action. As has been repeatedly noted in the EIS, the financial model used in PTMP is not used by the Trust as an accounting model or budget projection. It relied on a set of reasonable but often simplified assumptions so as to make a meaningful comparison of hypothetical 30-year planning alternatives, but was not designed or meant to be relied upon by the Trust or outside parties as the basis to track the Trust’s financial status or to measure future progress against self-sufficiency. The Trust therefore initially declined public reviewers’ suggestion for an accounting standards audit. At the same time, the Trust in discussions with GAO as to how best to satisfy its recommendation, agreed to open its financial accounting information to the National Academy of Public Administration, which will conduct a review of the Trust.

Financial

The Sierra Club continues to be critical of the PTMP financial planning model, and has raised a number of specific objections concerning modeling assumptions.

Response: The points noted in the Club’s correspondence have been raised previously in comments on the financial analysis in the Draft EIS and responded to in the Response to Comments (Volume II) of the Final EIS. Each specific objection is responded to again below.

1. Difference between the Financial Planning Model and the FY03 Budget.

As the planning process progressed, the Trust incorporated a number of factual updates to the financial modeling assumptions to reflect the best available information. The Sierra Club seeks further changes now to the modeling assumptions. Every planning process has its end, and updating the model continually is neither possible nor necessary, particularly given its limited purpose. Moreover, any further update, in this instance is unwarranted. A final FY03 budget has not yet been submitted to Congress or adopted by the Trust.

The financial analysis provided in the Final EIS is an assumption-driven analysis, intended to test the relative strength of a variety of land use alternatives over a 20-30 year period utilizing mostly common but simplified planning assumptions. The analysis is not intended as a projection or plan for how the Trust will allocate budgets in the future, and the costs and revenues shown within the analysis for each year will almost certainly deviate from the Trust’s adopted budget in FY03 and in subsequent years. For more discussion on the financial planning analysis, its purposes and assumption, and its relationship to other financial management tools such as one year budgets, multi-year budget projections, and the 1998 Financial Management Program (FMP) presented to Congress, see PTMP page 115, and Final EIS Volume II, Section 4.30 (Responses to Operations/Financial Comments) at pages 4-280 to 4-314, particularly Response to Comment FI-1.

2. \$5 Million in “extra” expenses not in the FY03 Budget

See item one, above, regarding the relationship between the long-term financial planning analysis, budgets, and other financial management tools. The financial modeling in PTMP was designed as a comparative tool, and is not intended to predict future budgets, long-term costs, actual revenues, or other future financial decisions of the Trust. The Sierra Club continues to misconstrue the nature and intent of the financial planning analysis provided in the Final EIS, despite detailed explanations provided in the Final EIS. (See Final EIS pages cited in #1above.)

The Trust’s mission is to preserve and enhance the cultural, natural, scenic, and recreational resources of the Presidio. To achieve this mission, the Trust must maximize the expenditure of available funds on capital projects, and this strategy will be reflected in the FY03 budget and in all subsequent budgets. Available funds will fluctuate annually with revenues and expenses, undoubtedly in ways that the long-term financial analysis presented in the Final EIS could not anticipate, but these funds cannot be properly viewed as “extra.”

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3. Residential Revenue Over Time

Table E4 in Final EIS Appendix K is generally consistent with Figure 4.1 of the PTMP. Both indicate that residential revenues will start to decline around 2013, just as annual appropriations cease. Table E4 pp. 4-5 shows \$22.3 million in net residential revenue in 2002, \$28.7 million in 2006, \$24.2 million in 2013, \$22.0 million in 2020, and \$19.0 million in 2030.

Figure 4.1 is a generalized schematic diagram showing the fact that residential revenue will decline as housing is removed to achieve the Plan's natural resource objectives. This commitment has been universally supported by environmental organizations, though it comes with a steep price tag including the cost of demolition, the cost of restoration, and — inevitably — lost revenue. Even though the PTMP calls for replacement of housing needed to meet the demand by Presidio-based employees, replacement housing will generate less net revenue than existing housing. Table E4 is a modeling scenario, reflecting a simplified, conservative but perfect financial world where buildings are leased on an optimum schedule by exactly the type tenant needed; tenants are always available; they all pay market rent; costs are known and never increase; markets never fluctuate; and contingencies are always manageable. Thus, Table E4 does not show “actual numbers,” but rather estimates of what could arise if all assumptions of the model were to occur. The Trust must plan to manage a more complex and uncertain financial reality, and Figure 4.1 generalizes that reality.

4. Interest Income

The Sierra Club's comment regarding interest income is responded to in the Final EIS. See Final EIS Volume II, Response to Comment FI-6 (pages 4-285 to 4-286).

5. Outside Funding Sources

The Sierra Club's comment regarding outside funding sources is responded to in the Final EIS. See Final EIS Volume II, Response to Comment FI-29 (page 4-311).

6. Assumption Regarding Parking Fees and Transit Expenses

The Sierra Club's comment regarding parking fees and transit expenses is responded to in the Final EIS. See Final EIS Volume II, Response to Comment FI-34 (page 4-313). The Trust helps to fund MUNI service with grant funds obtained from outside sources. The “impact” of this activity is increased transit accessibility, and is considered beneficial.

7. “Real” and “Constant Dollar” Interest Rates

The Sierra Club's comment concerning the model's treatment of the effects of interest is responded to in the Final EIS Volume II as noted in item #4 above. Regarding financing costs, the financial model assumes all alternatives would include \$50 million in U.S. Treasury borrowing, the base-level appropriation authorized by the Trust Act. As described in Final EIS Volume II, page 4-298, “Cost estimating, particularly over a long planning horizon, is inherently uncertain . . . a change in this assumption would have to be made across the board for all alternatives, and therefore would have an equal effect across the range. For this reason, a change in [the interest rate] assumption would not [provide] new or different information in this context, where the model is used only as a . . . tool . . .” to compare the relative financial strength of a variety of land use alternatives.

8. Further U.S. Treasury Borrowing

As explained in the PTMP (page 119), Congress has authorized additional U.S. Treasury borrowing, but any additional borrowing will be subject to appropriation as part of the annual budget process. Thus, these funds are not guaranteed, and have not been included in the Final EIS analysis. See Final EIS Volume II, page 4-296 footnote 12. This decision not to assume additional borrowing for purposes of PTMP modeling does not affect the Trust's “flexibility over the next decade” as suggested by the Sierra Club. As explained in item one, above, the financial analysis presented in the Final

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EIS is simply intended to test the relative strength of a variety of land use alternatives over a 20-30 year period utilizing mostly common and somewhat simplified planning assumptions. The analysis is not a projection or plan for how the Trust will budget in the future, and its assumptions will not constrain the Trust's future decision-making.

9. Letterman Digital Arts Center (LDAC)

The Sierra Club's comment regarding the need for revenue from the Letterman Digital Arts Center project is responded to in the Final EIS. See Final EIS Volume II, Response to Comment FI-28 (pages 4-310 to 4-311).

The financial model was used to test the effect, given a common set of assumptions, of eliminating the LDAC project. Without the revenue from LDAC, the PTMP would be only marginally self-sufficient in 2013, with an operating margin of around \$3 million (about 4%). In addition, the time required to complete capital improvements would be extended from 2025 to 2055, and the time required to fund capital reserves and become financially sustainable would be extended from 2029 to between 2070 and 2075. In other words, if the LDAC project were foregone, the resources of the Presidio would not be preserved or enhanced for many, many generations, and would therefore face greater risks due to deferred improvements, natural disasters, and changes in circumstances.

Transit, Transportation, and Parking

Three City of San Francisco departments concerned with transportation and utility matters reviewed the Final EIS at the request of the San Francisco County Board of Supervisors. The **San Francisco Municipal Railway (MUNI)** noted three areas of interest based upon its review of the Final EIS and Response to Comments. Each is addressed below

1. The Plan and EIS should incorporate MUNI's estimates of potential transit service costs and acknowledge that the increases in ridership projected by the EIS will require significant increases in transit service.

See Final EIS Volume II, Response to Comment FI-35 (pages 4-313 to 4-314).

2. The Plan should quantitatively assess the financial capacity of the Trust to address transportation mitigation, in particular increased transit service.

The reviewer acknowledges the response to this issue in the Final EIS Volume II, Response to Comment FI-35 (page 4-313 to 4-314) with respect to transportation mitigation costs, but claims the Trust should quantitatively assess the financial needs for all mitigation. The basis for the response as to transportation mitigation costs applies equally to the costs of other mitigation measures identified in the Final EIS.

3. The Plan should reserve potential rights-of-way, sites and clearances for future transit facilities, including alignments for any future E or F line rail extension.

The Presidio Trust is dedicated to improving transit service to the Presidio, and the Trust will continue to work with MUNI to make increased transit service a reality. See Final EIS Volume II, Response to Comment TN-1 (pages 4-235 to 4-236). The Presidio Trust will play an active role in planning efforts for the E-line extension to Fort Mason and as stated in Response to Comment TN-1 and is supportive of extending such service to the Presidio. However, rights-of-way for transit service cannot be reserved prior to determination of the preferred alignment of the E-line extension.

The **San Francisco Department of Parking and Traffic (DPT)** noted a number of comments, many of which have been responded to in the Final EIS Volume II, Response to Comments. References to portions of the Final EIS that were overlooked in DPT's review and additional clarifications, as needed, are provided below.

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1. Clarify Final EIS Volume I, Table S-1 (page S-19 through S-21) to provide current daily vehicle trips, parking spaces, pedestrian and bicycle trips and transit trips.

Table S-1 is a summary table and the underlying information and statistics requested are in the Final EIS. The parking supply shown in Final EIS Volume I, Table 49 (page 315) for the Minimum Management Alternative reflects the current number of parking spaces in Area B of the Presidio. The reviewer can compare the relative magnitude of traffic conditions associated with each alternative to current traffic conditions by referring to Final EIS Volume I, Table 45 (page 308), which presents the expected p.m. peak hour traffic volume through Presidio gates as well as the current p.m. peak hour Presidio gateway volumes. The reviewer can also compare existing intersection levels of service to expected future levels of service during the a.m. peak hour and the p.m. peak hour in Final EIS Volume I, Tables 46 and 47 (pages 309, 310), respectively. Bicycle trips are presented in Final EIS Volume I, section 4.5.4 (pages 316-317) and transit trips in Final EIS Volume I, section 4.5.5 and Table 50 (page 319).

2. Mode split surveys

See Final EIS Volume II, Response to Comment TR-10 (page 4-230).

3. Presidio Internal Shuttle

See Final EIS Volume II, Response to Comment TN-3 (page 4-230).

4. Levels of Service (LOS) for Intersections

Existing intersection LOS are shown in the Final EIS Volume I, Tables 46 and 47 (pages 309, 310).

5. Letterman Digital Arts Center Parking

See Final EIS Volume II, Response to Comment TDM-13 (page 4-261). See also the Trust's Letterman Complex EIS finalized in May 2000.

6. Transportation Mitigation Measure TR-3

The Trust recognizes the difficulty in negotiating the right turn from the curb lane of 25th Avenue to Lincoln Boulevard without encroaching into the intersection's westbound left-turn lane. However, the Trust's preliminary study of geometrics of this intersection indicates that this issue can be resolved by restriping the westbound approach and possibly the northbound approach of the intersection. The various alternatives for restriping these intersection approaches to accommodate buses turning right from 25th Avenue to Lincoln Boulevard could require that on-street parking be removed on the west side of 25th Avenue or the north side of Lincoln Boulevard rather than the east side of 25th Avenue as described in the PTMP FEIS. Trust staff will conduct more detailed study of possible restriping alternatives, and subsequently review alternatives with the San Francisco Department of Parking and Traffic when traffic volumes reach levels that warrant improvement. It should also be noted that tour buses are restricted from using the 25th Avenue gate, and that at most only four Muni buses per hour currently make this turning maneuver and that this number is not expected to increase significantly for several years.

7. Transportation Mitigation Measure TR-11

See Final EIS Volume II, Response to Comment TR-15 (page 4-232). The Trust is currently evaluating various alternatives for reopening the 14th Avenue gate to vehicular traffic that would avoid installation of a traffic signal at this location. Trust staff will present the results of this analysis to the San Francisco Department of Parking and Traffic for review and consideration, and subsequently to interested neighborhood groups. With the basic one-way couplet configuration analyzed in the Final EIS, both the northbound and southbound approaches to the 14th/Lake intersection

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would operate at a poor level of service during both the a.m. and p.m. peak hours. In 2020, the Final Plan alternative is estimated to add 54 and 120 vehicles to the northbound approach in the a.m. and p.m. peak hour, respectively.

8. Transportation Mitigation Measure TR-12

Trust staff have evaluated alternative improvements to this intersection that would allow it to operate at an improved level of service during peak commute hours, and have preliminarily discussed these improvements with the San Francisco Department of Parking and Traffic. Provision of a southbound right-turn lane and the possible provision of a northbound left-turn lane have been identified as alternatives to the eastbound left-turn lane described in the mitigation measure for this intersection. The Trust will continue to review these alternative improvements with the Department of Parking and Traffic to identify the most appropriate mitigation strategy for this intersection.

9. Transportation Mitigation Measure TR-15

See Final EIS Volume II, Response to Comment TR-15 (page 4-232). Some of the alternatives analyzed for the reopening of the 14th Avenue gate discussed above would also affect the routes of traffic previously projected to travel through the 14th/California intersection. If two-way STOP-control is maintained at the intersection of 14th/Lake, improvements at the 14th/California intersection may not be warranted. Trust staff will work with the San Francisco Department of Parking and Traffic to design the appropriate mitigation strategy for the 14th/California intersection if and when improvement is warranted.

10. Transportation Mitigation Measure TR-21

It is impossible to foresee the types, sizes and locations of special events in the Presidio. However, as stated in Mitigation Measure TR-24, special events that could result in overflow parking would be coordinated to ensure that parking supply in the Presidio is not exceeded or can be accommodated.

The **San Francisco Public Utilities Commission** reviewed the Plan and EIS concluding “most of our comments and concerns were addressed satisfactorily.” Several issues, claimed not to have been addressed, are clarified below.

1. Meeting Presidio water supply demands

The SFPUC asks how the Presidio’s water demands will be met if groundwater supplies are lost and the SFPUC cannot “supply all of the Presidio’s water demand.” This issue was previously addressed. See Final EIS Volume II, Response to Comment UT-1 (pages 4-267 to 4-268). The Trust is not currently nor is it proposing in the future to use groundwater resources to meet water demand at the park. The SFPUC does not supply “all of the Presidio’s water demand” and in fact, the majority of demand is met by on-site water resources from Lobos Creek. As has been the case historically, on-site supplies are supplemented with water purchased from the SFPUC on an as-needed basis. The volume purchased varies year to year, and last year the Trust purchased approximately 15% of the total water consumed at the Presidio from the SFPUC. The Trust is actively pursuing actions to minimize the use of off-site water through a combination of aggressive conservation and development of an on-site water recycling system. The on-site water recycling system was recently approved by the Trust based upon a separate and independent environmental assessment and finding of no significant impact under NEPA.

The Presidio is a retail customer of the SFPUC and as such, the purchase and use of water from the SFPUC is subject to its water shortage regulations, including mandatory water rationing programs and rate structures adopted during drought conditions. The Mitigation Measure UT-2 (Water Shortage Emergency Response) was modified in response to the SFPUC’s comments on the Draft EIS to specifically acknowledge these requirements.

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2. Stream restoration projects and groundwater conditions

See Final EIS Volume II, Responses to Comments WR-3 and WR-4. Restoration of the Tennessee Hollow Watershed was identified and evaluated at a programmatic level in the PTMP EIS. As described in Volume II of the Final EIS, Responses to Comments WR-3 and BR-4, the Trust is currently conducting within the watershed a ground and surface water monitoring program, which will be used in the public planning and environmental review process currently underway for this project. Additional detail on the potential ground water resource effects resulting from the various restoration alternatives will be identified and evaluated in the Trust’s forthcoming NEPA document for the Tennessee Hollow Watershed Restoration Project.

3. Recycled water and groundwater quality

See Final EIS Volume II, Response to Comment UT-5. As indicated in Volume II of the Final EIS, Response to Comment UT-5, an analysis of the Presidio water recycling project’s effect on groundwater quality is provided in a separate NEPA document. Refer directly to Section 3.3 of the July 2002 Presidio Water Recycling Project Environmental Assessment (EA) for additional information. Copies of the Final EA have been previously sent directly to the SFPUC.

4. Using recycled water during wet weather

The SFPUC asks how recycled water will be used during wet weather. As described in Section 2.2 of the Presidio Water Recycling Project EA, there are two seasonal operational scenarios that can be implemented. The first is to shut down the plant during the winter months when irrigation demand is low or absent. Under this scenario, no recycled water would be produced during wet weather. The second operational scenario (“continuous operation”) was developed and evaluated in the EA at the request of the City and County of San Francisco. Under this scenario, the water recycling plant would be continuously operated and would produce recycled water on as-needed basis to meet off-peak irrigation demands. During a peak weather event, the Trust could increase production of the plant and store recycled water on-site. Following the event, the treated water could either be used to meet irrigation demand or would be diverted back to the City’s combined sewer system.

Maps

The San Francisco DPT commented on the maps presented in the Final EIS at pages 31, 45, 51, and 57 (Figures 6, 8, 10 and 12)

Response: For each alternative, two figures are presented in the Final EIS — future land uses and building use preferences. For four of the alternatives, the base map used to present building use preferences show the existence of Wherry Housing and associated roads, and the inclusion of these existing features on the base map caused confusion for one reviewer. Under each of these four alternatives (Final Plan, Resource Consolidation, Sustainable Community, and Cultural Destination), Wherry Housing is removed to accommodate open space and native plant community expansion, and its removal is clearly indicated in the land use graphics for each alternative (Figures 5, 7, 9, and 11) as well as in the text description and throughout the analysis provided in the Final EIS. Reviewers should refer instead to the land use preference maps for the accurate depiction of the long-term treatment of Wherry Housing.