



## RECORD OF DECISION

### PRESIDIO TRUST MANAGEMENT PLAN FINAL ENVIRONMENTAL IMPACT STATEMENT

The 1994 GMPA vision gave the Presidio a noble purpose and captured the imagination of the local public. Because it relied on ongoing taxpayer support, Congress ultimately deemed the 1994 GMPA to be “unrealistic.” H.R. Rep. No. 234 at 10, 104<sup>th</sup> cong., 1<sup>st</sup> Session (1995).

The Presidio Trust Management Plan owes much to the 1994 GMPA, but proposes a more focused and realistic vision: the preservation of the Presidio's cultural, natural, scenic, and recreational resources for the American people.

The Presidio is the legacy of the generations who lived here and cared for this post. That legacy will be carried forward with the same spirit. The Trust envisions the Presidio as a home to an enduring community, where people from the public, private, and non-profit sectors come together and share their ideas and resources; where artists, scientists, and storytellers pursue their passions; where families play together; where visitors deepen their understanding of this nation's social history and of the connections between human and natural history; and perhaps most important, where an individual, alone or in concert with others, can find peace of mind and personal inspiration.

(PTMP, page v).

The Presidio Trust (Trust) has prepared this Record of Decision (ROD) for the *Final Environmental Impact Statement, Presidio Trust Management Plan, Land Use Policies for Area B of the Presidio of San Francisco* (Final EIS). The Final EIS is a programmatic Statement and supplements the 1994 *Final General Management Plan Amendment Environmental Impact Statement for the Presidio*. The Trust developed the ROD in compliance with agency decision-making requirements under the National Environmental Policy Act of 1969 (NEPA), as amended (42 U.S.C. §§ 4321 *et seq.*), NEPA's implementing regulations promulgated by the Council on Environmental Quality (CEQ) (40 C.F.R. §§1500-1508), and the Trust's supplemental implementing regulations at 36 C.F.R. Part 1010.

The ROD documents the decision and rationale for adopting the *Presidio Trust Management Plan, Land Use Policies for Area B of the Presidio of San Francisco* (PTMP) (identified during project scoping and review of draft documents under the name Presidio Trust Implementation Plan or PTIP), and is identified in the Final EIS as the Final Plan Alternative. The ROD also provides background about the Trust and the planning effort, and describes the alternatives considered, public involvement, agency consultation, mitigating measures developed to avoid or minimize environmental impacts of the selected alternative, and use of the Final EIS in subsequent decision making. It also identifies as required by NEPA, the environmentally preferable alternative, and sets forth an evaluation of alternatives and the reasons for adopting the Final Plan Alternative.

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## I. BACKGROUND

The 1,491-acre Presidio of San Francisco (Presidio) is one of the country's great natural and historic sites. Its distinctive resources include its historic architecture and landscapes, unique ecological systems and rare plant communities, inviting parklands, dynamic shoreline, spectacular views and recreational resources. Situated as it is, both within the heavily urbanized San Francisco Bay Area, and at the center of the 77,000 acre Golden Gate National Recreation Area (GGNRA), the Presidio attracts visitors from near and far who take advantage of interpretive programs and exhibits, visit the historic military sites, and enjoy the natural beauty, resources, open space and scenery.

A military garrison for over 220 years, the Presidio has served Spain, Mexico, and the United States of America; it protected commerce, trade, and migration, and — until its closure in 1994 — played a role in every major U.S. military engagement since the Mexican-American War in 1846. Designated a National Historic Landmark District (NHL) in 1962, the Presidio contains one of our country's finest collections of places, buildings, structures, and artifacts related to military history, and its architecture represents every major period of U.S. military history since the 1850s.

The Presidio includes about 500 developed acres with approximately 770 buildings providing approximately 6.1 million square feet of building space, Presidio-wide. Over half of the Presidio's buildings are historic and contribute to the status of the Presidio as a NHL. The Presidio contains offices, warehouses, and more than 1,600 residential accommodations in almost 400 buildings. The residential accommodations range from large single-family homes and duplexes, to apartment complexes and barracks. Community and visitor facilities support the residents and employees of various organizations located in the Presidio. Facilities include chapels, a child care center, post office, bank, meeting facilities, retail stores, tennis courts, a bowling center, theater, swimming pool, golf course, gymnasiums and more. The Presidio also has its own electric distribution, telecommunication, water, wastewater collection, storm drain, and refuse collection systems and services.

Dramatic headlands, a favorable climate, rich soils, water resources and protected open space have contributed to the site's rich biological diversity. As the surrounding areas have become more urban, the Presidio has provided critical refuge for plants and wildlife. Rare plant communities that have disappeared in the rest of the San Francisco peninsula survive within the Presidio. These remnant native plant communities preserve rare and endangered plant species and provide valuable wildlife habitat. The habitats include serpentine grasslands where wildflower and grass species flourish; the last remnants of dune communities that once covered what is now the city of San Francisco; and riparian and wetland communities including Lobos Creek, the best example of a native riparian community in the city. The Presidio contains a number of rare plants including Raven's manzanita, which has been saved from extinction through the GGNRA's plant propagation program. Other important natural resources include the still visible drainages at Mountain Lake, Lobos Creek, Tennessee Hollow, and the newly restored tidal wetland at Crissy Field.

The Presidio also provides rare and outstanding recreational resources within a major metropolitan area. It offers opportunities for a wide range of active pursuits as well as places for solitude and retreat. Sites throughout the Presidio provide spectacular vistas of the Pacific Ocean, the Golden Gate, the Marin Headlands, San Francisco Bay, and the skyline of San Francisco. Visitors enjoy walking, jogging, biking, sightseeing, surfing and wind surfing, sailing, fishing, and learning about the Presidio's history and environment. Others participate in an active stewardship program focused on preserving and restoring the park's natural systems.

### A. FROM MILITARY POST TO PARK

The Presidio's transition from military post to park began in 1972, when Congress authorized the formation of the GGNRA. In the legislation that established the GGNRA (the GGNRA Act, Public Law 92-589; 86 Stat. 1299; 16 U.S.C. 460bb), Congress mandated that the Presidio would become part of the GGNRA if the Department of Defense ever declared the base to be in excess of its needs. The Presidio was designated for closure on the 1989 Base Closure and Realignment Act list and, in 1994, it was transferred to the U.S. Department of the Interior, National Park Service (NPS).

Following the establishment of the GGNRA in 1972, the NPS prepared and approved in 1980 a General Management Plan/Environmental Analysis (GMP) — a programmatic document that set forth the basic management philosophy for

the national recreation area and Point Reyes National Seashore. In response to the 1989 Presidio closure announcement and pending transfer of ownership, the NPS initiated a supplemental public planning and environmental review effort to update the 1980 GMP with specific management and land use actions for the Presidio. The result of this effort was the final GMP Amendment (GMPA) and corresponding EIS. NPS approved the GMPA in July 1994. The GMPA laid out specific land use plans for 13 distinct planning districts to guide visitor use, cultural and natural resource management, development and operation of the Presidio, and also assured that more detailed site-specific plans/designs with supplemental environmental analysis would be needed during GMPA implementation.

Once the GMPA was in place, difficult questions regarding its implementation were raised. The GMPA vision required that Presidio buildings be leased to “a network of national and international organizations devoted to improving human and natural environments and addressing our common future.” This vision gave the Presidio a noble purpose, however the plan came with high operating and capital costs (then projected at \$40 million annually and \$490-\$741 million, respectively). Congress was unwilling to commit the federal monies needed over the long-term to improve, protect, and maintain the Presidio as a global center dedicated to addressing the worlds most critical challenges, and instead created the Presidio Trust (Trust) with a one-of-a-kind mandate to generate the monies needed to preserve and enhance the cultural, natural, scenic, and recreational resources of the Presidio for public use while achieving long term financial sustainability.

## **B. THE PRESIDIO TRUST AND ITS UNIQUE MANDATE**

In 1996, Congress enacted the Presidio Trust Act (Trust Act), establishing the Trust as a wholly-owned federal government corporation to transform the former military post into a financially self-sufficient national park by the year 2013 and to protect and preserve its natural, historic, scenic, and cultural and recreational resources for public use in perpetuity. Congress divided the Presidio into two areas: Areas A and B. Area A, which encompasses the coastal areas and Building 102 (about 20 percent of the land area of the Presidio), remained under NPS jurisdiction. On July 1, 1998, jurisdiction and management of the 1,168 acre interior portion (Area B) of the Presidio, containing the vast majority of buildings (730 buildings with 5,960,000 square feet of building space) and 80 percent of the land area, was transferred from the NPS to the Trust.

Many of the Trust Act requirements for management of Area B differ significantly from those the NPS must meet in managing property under its administrative jurisdiction, including most notably the requirement that the Trust generate sufficient revenues to undertake all required capital improvements and to fund park operations without annual federal appropriations starting in 2013. The differences, along with other changes in circumstances since the GMPA was adopted in 1994, prompted the Trust to reexamine the land use plan (i.e., the GMPA) for Area B. The Trust, in consultation with the public and other agencies, determined that the best way to undertake this needed review and update would be through a public planning and environmental review process. The Presidio Trust Management Plan (incorporated herein by reference) and the Final EIS, including public and agency comments on the Draft EIS and Draft Plan, encompass the results of that effort.

An updated management plan for area B of the Presidio under the Trust’s jurisdiction is a critical next step towards meeting the Trust’s congressional mandates. For more than two years, while preparing the Plan, the Trust voluntarily refrained from new long term leasing, and completion of the planning process will remove that voluntary constraint. Renewal of long term leasing, in conformance with an overall management plan for the Presidio, is an absolute necessity if the Trust is to begin again to attract tenants and investors willing to assume the substantial costs of rehabilitating the Presidio’s historic structures and to meet the Congressionally required financial goals and year 2013 deadline. Without completion of an updated management plan, frequent, time consuming amendments of the 1994 GMPA would be required, slowing the pace of achieving both financial and resource protection needs. In addition, the current plan would not as clearly reflect updated information and changes in circumstances since 1994, including the departure of the 6<sup>th</sup> U.S. Army, prior decisions regarding the Letterman Hospital site, and requirements of the 1996 Trust Act, including for example the Trust Act’s tenant selection criteria and the requirement that the Trust become financially self sufficient by fiscal year (FY) 2013.

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## II. DECISION (SELECTED ACTION)

The Presidio Trust Board of Directors, through this ROD and the attached Board of Directors' Resolution No. 02-19, adopts the *Presidio Trust Management Plan; Land Use Policies for Area B of the Presidio of San Francisco* (PTMP or Plan) as the updated management plan for Area B of the Presidio. The selected action is identified as the Final Plan Alternative within the Final EIS, and is chosen after a lengthy and thorough analysis of the alternatives and their potential environmental consequences, consideration of all public and agency comments received during the NEPA process, the complete record of the Trust, the mandates of the Presidio Trust Act, and other considerations described in this ROD.

The PTMP will ensure that the Presidio remains a great national park site, and proposes to dramatically expand open space in the park and decrease the amount of building space over time. In total, 100 additional acres of open space will be created, mostly in the southern section of the park, and 360,000 square feet or more of building space will be eliminated. Within the building space that remains, the PTMP calls for a balance of uses, with about one third of the buildings being used for housing, one third for office, and one third for public-serving uses. The amount of future housing will not exceed the current amounts, and people who work in the park will continue to receive housing preference, as a way to reduce automobile travel in and out of the park. New office users will generally be small businesses or organizations, as the type of office space available will not appeal to large commercial enterprises that typically locate in the central business district or suburban business parks. Public-serving uses will include cultural and educational uses (e.g., museums and exhibition space, public or private schools and learning centers, historic sites, performing arts venues), recreation, small-scale lodging and other amenities for park visitors.

Planning principles included in the PTMP express the Trust's commitments to preserve and enhance the cultural, natural, recreational, and scenic resources of the Presidio, including commitments to preserve the NHLD, to increase native habitats, and to pursue the long term health of Crissy Marsh, a recently restored tidal wetland. Planning principles also express the Trust's desire to provide for a wide array of public uses and programs, many in partnership with the NPS, park tenants, and others, with the goal of bringing people to the park to understand, enjoy, and appreciate the Presidio's value.

The PTMP calls for the use of sustainable practices and environmentally sound technologies, and includes strategies to minimize automobile use, use of "green building" guidelines, energy and water conservation, materials recycling, pollution prevention and abatement, and environmental remediation. Planning district guidelines are provided to guide physical changes that may be proposed in the future, ensuring their compatibility with the park and the NHLD. Any major new construction will be required to conform with these quantitative and qualitative standards, and will be the subject of further public input and review. Tenant diversity is embraced as a policy, and three tenant selection criteria are provided, addressing financial, programmatic, and policy issues. Preferred tenants will serve the public interest and will meet all three selection criteria.

Overall, the PTMP provides a vision for the park's future in place of the "global center" dedicated to addressing the world's most "critical challenges" that was proposed in the 1994 GMPA. The new vision focuses on the preservation and enhancement of the Presidio's resources for public use and enjoyment; it acknowledges that by making the Presidio a demonstration and education site for preserving open space with high biological values within an urban area, one of the world's most "critical challenges" will be addressed. With implementation of PTMP, the Trust will preserve and interpret the Presidio's natural, cultural, scenic, and recreational resources as part of a great national park where people may develop a deeper awareness of our nation's history and the social landscape of the West; where visitors may develop a more comprehensive understanding of connections between human and natural history, and find personal inspiration. Achieving the vision will not be easy, and will demand that all goals, including preservation and financial goals, be carefully balanced and integrated, as provided in the PTMP.

Features of the PTMP are fully described as the Final Plan Alternative in Section 2.5 of the Final EIS and in the separate volume, released to the public with the Final EIS, called the *Presidio Trust Management Plan: Land Use Policies for Area B of the Presidio of San Francisco*.

## III. OTHER ALTERNATIVES CONSIDERED

In addition to the selected action, the Trust developed and considered five other alternatives to the PTMP (Final Plan Alternative) and one variation of the Final Plan Alternative, as described below. The Trust developed the range of programmatic alternatives based upon extensive public participation in scoping and reviews of documents, and so as to capture a range of possible actions and impacts.

### A. NO ACTION ALTERNATIVE (GMPA 2000)

The General Management Plan Amendment (GMPA) 2000 Alternative, has been included in the analysis to evaluate the impacts of a “no action” alternative as required by NEPA and to reflect what would happen if no further changes were made to the GMPA as finalized by the NPS in 1994. This Alternative is the baseline against which other alternatives in the Final EIS are compared. In formulating the No Action Alternative, the Trust remained as close to the 1994 GMPA land use assumptions as present circumstances will allow. The No Action Alternative is not without impacts and would have resulted in changes to the Presidio. Specific events and changes since 1994 make it impossible to rely on the GMPA alternative exactly as it was described (i.e., “Alternative A”) in the Final GMPA and associated EIS. Primary differences between the 1994 GMPA and the updated “GMPA 2000” Alternative are summarized in Section 2.1 of the Final EIS, and include the departure of the Sixth U.S. Army and updates to reflect more current leasing and financial conditions.

The No Action Alternative would implement the 1994 GMPA for the Presidio as updated to year 2000 conditions. Tenants and residents would work together to create a global center dedicated to addressing the world’s critical environmental, social, and cultural challenges. Cultural and natural resources throughout the Presidio would be protected and enhanced and new programs would be established through public/private partnership. Historic buildings and landscapes that distinguish the NHLD would be rehabilitated and adaptively reused. Buildings would be removed to increase open space and/or enhance recreational, cultural, and natural resources. The housing supply would be substantially reduced and remaining units would be used by park partner employees, program participants, and visitors. The historic forest, streambed and riparian corridors, native plant communities, and recreational opportunities would be protected, improved, and expanded in some instances. A variety of improvements would be implemented to make the Presidio easy to reach, explore, and enjoy.

The Presidio would become a model of environmental protection and sustainable design. Tenants with an organizational mission focused on environmental and social sustainability or skills in education and science, innovative technologies, and problem solving would be selected to lease buildings and develop and operate programs at the site. Park partners would offer a wide range of programs to inform visitors about the Presidio’s resources, discuss global concerns, celebrate cultural diversity, and educate the public on environmental issues. The Trust and NPS would cooperate to provide a base level of interpretive services and education about the Presidio’s history and significant resources. The No Action Alternative is more fully described, together with proposed land uses and description of building use preferences, in Section 2.4 of the Final EIS. Reasons for choosing a different alternative are set forth in Section IV, below.

### B. FINAL PLAN VARIANT

The Variant to the Final Plan alternative was included at the request of several environmental organizations during the public review period on the Draft EIS. The Variant is modeled closely after the land use proposals of the Final Plan Alternative, and its environmental impacts fall within the range presented by the other alternatives. The Final Plan Variant places a greater emphasis on open space than either the Final Plan Alternative or the No Action Alternative, calling for greater building demolition and therefore less built space as well as no new construction. The Variant proposes an overall building square footage of 4.7 million square feet, and would demolish a number of historic buildings that contribute to the NHLD status to achieve the reduction in building space. Similar to the Final Plan Alternative, the Variant would seek to rehabilitate and reuse historic buildings, adapt non-historic buildings to high priority uses, expand open space, and achieve financial self-sufficiency.

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There would be proportionately less cultural/educational building use and proportionately more office use in the Final Plan Variant when compared to the Final Plan Alternative. More housing would be provided than under the No Action Alternative, but less than under the Final Plan Alternative, and less than exists today. As in the Final Plan Alternative, some housing units removed in other parts of the park would be replaced through subdivision and conversion of existing space, but the possibility of obtaining any replacement units through new construction would be foreclosed in the Final Plan Variant. Like the No Action Alternative, tenants would not be selected unless they offered a business purpose dedicated to addressing critical world challenges and park programming. The Variant is more fully described, together with proposed land uses and description of building use preferences, in Section 2.6 of the Final EIS. Reasons for choosing a different alternative are set forth in Section IV, below.

## C. RESOURCE CONSOLIDATION ALTERNATIVE

Under the Resource Consolidation Alternative, the Presidio would become an enhanced open space haven in an urban setting by maximizing the increase in open space in the southern part of the park and concentrating development in the north. Overall, building square footage in Area B would be reduced from what currently exists due to loss of residential units and building space. A substantial number of buildings would be demolished, including the entirety of the historic Public Health Service Hospital (PHSH) complex, which would affect the integrity of the NHLD. Open space and natural resource enhancements (e.g., endangered species recovery and Tennessee Hollow riparian restoration) would be maximized, and recreational opportunities expanded. Tenets of sustainability, bio-diversity, smart growth, and preservation would be promoted by preserving and enhancing the Presidio's natural and cultural resources and concentrating building area, including in-fill mixed-use and housing construction in the northern part of the park. Buildings would be rehabilitated for new uses. The primary goal would be reuse of existing structures along with compatible new construction that would generate sufficient funds for open space improvements and park enhancements. Park programs would be delivered in a manner similar to the Final Plan Alternative, but at a somewhat reduced level. Programs would focus on the park's bio-diversity, including native species and ecosystems, and the history of the Presidio. The Resource Consolidation Alternative is more fully described, together with proposed land uses and description of building use preferences, in Section 2.7 of the Final EIS. Reasons for choosing a different alternative are set forth in Section IV, below.

## D. SUSTAINABLE COMMUNITY ALTERNATIVE

Under the Sustainable Community Alternative, the Presidio would become a sustainable live/work community in a park setting and a model of environmental sustainability. The Alternative emphasizes creation of a Presidio-based community of users offering innovative, state-of-the-art approaches to environmental sustainability and related subjects. Open space and recreational opportunities would be expanded, and historic forest and native plant communities improved. Riparian corridors would be restored and the historic forest rehabilitated and preserved as part of the cultural landscape. The historic character and integrity of the NHLD would be protected. A moderately low level of non-historic building demolition would occur to enhance open space and improve native plant communities. The footprint of the built environment would largely remain in its present dispersed pattern and an emphasis would be placed on building rehabilitation and reuse. While the existing number of housing units would decrease, the total number of units would be more than under the No Action Alternative (GMPA 2000). Residents would also work in the park, supporting a sustainable park community. Park programs would be delivered in a manner similar to that proposed by the Final Plan Alternative, but at a somewhat reduced level. The Sustainable Community Alternative is more fully described, together with proposed land uses and description of building use preferences, in Section 2.8 of the Final EIS. Reasons for choosing a different alternative are set forth in Section IV, below.

## E. CULTURAL DESTINATION ALTERNATIVE

In the Cultural Destination Alternative, the Presidio would be a national and international cultural destination park, a portal for visitors to the American West and Pacific, and a place of international distinction for its programs in research, education, and communication. Historic and natural resources would be protected to preserve the Presidio as a sustainable national park. Open space would be expanded. Native plant communities and riparian corridors would be restored; the historic forest would be rehabilitated and preserved as part of the cultural landscape, and recreational

opportunities would be increased. A substantial level of non-historic building demolition in the southern portion of the park would occur to enhance open space and restore critical habitat. Replacement construction would occur in the northern portion of the park to provide an improved mix of housing units and cluster housing near work and transit. The Trust would be primarily responsible for delivery of a wide variety of high quality programs in cooperation with NPS, tenants, philanthropic organizations, cultural institutions, and community volunteers. Tenants would support park programming in a number of ways, including directly providing a public program for park visitors, contributing financially, or offering in-kind services to a park program. Tenants would be selected in part for their financial contribution (as required by the Trust Act) and willingness and ability to support park program goals. The Cultural Destination Alternative is more fully described, together with proposed land uses and description of building use preferences, in Section 2.9 of the Final EIS. Reasons for choosing a different alternative are set forth in Section IV, below.

## **F. MINIMUM MANAGEMENT ALTERNATIVE**

Under the Minimum Management Alternative, the Presidio would be managed to the minimum extent needed to meet basic legal requirements, including protection of the visiting public and the park's resources. There would be no significant physical change beyond that already underway; no significant park enhancements, and no new building construction or building removal would occur. Buildings would simply be rehabilitated to meet essential code requirements, consistent with the Secretary of the Interior's Standards for historic buildings and then leased out for the highest and best use. Tenants would have discretion in offering publicly available programs, and preference would be given to those tenants proposing to offer programs or services consistent with the General Objectives of the GMPA. There would be no educational, visitor, or cultural programming beyond what already exists. The Wherry housing complex would remain in use indefinitely as housing. Housing would be improved to meet code and historic preservation requirements and made available for rent by Presidio-based employees and others according to a prioritization system. Natural resource systems would not be significantly enhanced. The Minimum Management Alternative is more fully described, together with proposed land uses and description of building use preferences, in Section 2.10 of the Final EIS. Reasons for choosing a different alternative are described in Section IV, below.

*Discussion of 40 CFR § 1505.2(b) Requirement:* CEQ regulations require that, in cases where an EIS has been prepared, the ROD, in addition to identifying all alternatives considered, must specify the alternative or alternatives which were considered to be environmentally preferable. 40 C.F.R. §1505.2(b). According to CEQ, "The environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA's Section 101. Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources." Forty Most Asked Questions Concerning CEQ's NEPA Regulations, Question #6, 46 FR 18026 (March 23, 1981), as amended, 51 FR 15618 (April 25, 1986). In this context, where there are a multitude of environmental interests, and by the very nature of the planning decision the ranges of impacts overlap, the determination is not clear cut.

Among the complexities in this determination is the need to weigh multiple environmental values against other considerations. For example, natural resource protection was often at odds with protection of historic and cultural resource values. Each alternative considered strikes a different balance between these interests. Similarly, protecting natural resources may be at odds with people's use of the park as measured by building space and visitors. Thus, from the point of view of natural resource protection, the Resource Consolidation Alternative is preferable because it creates the greatest extent of un-fragmented open space to enhance native plant habitat, wildlife corridors and other biotic values. But this alternative has the greatest adverse effect on individual historic structures (removes the historic portion of the Public Health Service Hospital and all adjacent historic buildings), and so is not preferable from a cultural resource standpoint.

Another way to view the inquiry is to assess the alternative that would result in the least damage to the environment as measured by physical change over time. From this perspective, the Minimum Management Alternative would result in the least physical change to the park, but would have greater effects on the environment from the greater numbers of people interacting in the park. The mirror image of this approach is to look for the alternative with the fewest number of people interacting in and with the park which reduces the direct and secondary environmental effects, and under this

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view, the No Action Alternative (GMPA 2000) and the Final Plan Variant are preferable. Another approach is to assess, as CEQ suggests, the alternative(s) that best protects, preserves and enhances the mix of historic, cultural, and natural resources. In this planning process, where resources cannot be protected without active intervention and timely and sufficient funding that is self-generated, the Final Plan Alternative would be environmentally preferable for all the reasons set out in the ROD. Under this same approach, the No Action Alternative (GMPA 2000), although it may take more time to achieve, would also protect and enhance the mix of historic, cultural, and natural resources of that Plan alternative. In terms of assessing the “least damage” noted by CEQ, none of the Alternatives, except for the Resource Consolidation Alternative (i.e., impaired status of the NHLD), result in a potential adverse effect that is unavoidable, and under this view, all other alternatives are environmentally protective and could therefore be said to be environmentally preferable.

The Trust has carefully evaluated all of these competing goals, values, and interests. In the context of this comprehensive planning process, where there are so many competing values and offsetting factors, the Trust’s determination of what is the environmentally preferable alternative must be reduced to an overly simplistic assessment that weighs one value against another or applies one approach over another. To resolve the difficulty, CEQ also guides that the comments from the public and other agencies can assist the lead agency’s determination. Thus, here, where a basis exists for identifying multiple alternatives as environmentally preferable, the Trust will also look to a segment of public sentiment that argued in favor of the No Action Alternative (GMPA 2000) as being preferred environmentally over other alternatives because it resulted over time in the least number of people within the park setting and therefore lesser secondary environmental effects.

The alternative selected for implementation need not coincide with the environmentally preferable alternative, because the decision to select a particular alternative may involve other factors. The Trust believes a balance of factors different than that offered by the No Action Alternative (GMPA 2000) is preferable for the park’s long-term management framework, and the other policy factors considered and the reasons for selecting the Final Plan Alternative are set forth in Section IV, below.

## IV. BASIS FOR THE DECISION

### A. BASIS FOR SELECTION OF THE FINAL PLAN ALTERNATIVE

The Trust has selected the alternative that, in its judgment, best fulfills the purpose and need outlined in Section 1.2 of the Final EIS, including the specific objectives of the Plan update (see Final EIS Section 1.3). The purpose of the Plan update is to provide a land use policy framework to guide the Trust’s implementation of the Trust Act by updating the management concepts and land use proposals of the 1994 GMPA for the area of the Presidio under the Trust’s jurisdiction. The PTMP provides such a framework, and meets three primary needs: 1) The PTMP is well-suited to and consistent with the statutory requirements for Area B enacted by Congress in the 1996 Presidio Trust Act; 2) The PTMP addresses changed conditions that have occurred since NPS adopted the 1994 plan for the Presidio, reconsiders and updates the GMPA’s market clusters concepts, and provides revised land use concepts for Area B of the Presidio that can accommodate changing opportunities and market conditions; and 3) The PTMP reflects the Trust’s management policies and approaches, plans and manages for financial uncertainty, and provides an approach to leasing and financing that better addresses market opportunities and realities, and offers flexibility to respond to market factors.

Specific objectives, developed with public input, provide a framework for evaluating the extent to which alternatives meet the purpose and need for the plan update. The objectives address the multiple and sometimes competing factors involved in meeting the plan’s purpose and need. The decision to adopt PTMP as the governing management plan for Area B of the Presidio is based upon having considered the following objectives independently and collectively and selecting the alternative that strikes the best balance among the many objectives and goals including resource protection, public use, and sound financial management, as discussed in detail below.

## ***1. PTMP IS CONSISTENT WITH AND ACHIEVES THE TRUST ACT'S RESOURCE MANDATE***

The PTMP focuses on the core mission of the Trust: the preservation of the Presidio's cultural, natural, scenic, and recreational resources for public use.<sup>1</sup> Unlike the other alternatives, the Final Plan Alternative not only emphasizes preservation and enhancement of the Presidio's cultural, natural, scenic, and recreational resources for public use, but also makes this the Plan's primary vision. Focusing the vision in this way follows and is consistent with the urging of the NPS, which stated in its comments on the Draft Plan: "The Presidio's unique park character — its significant cultural natural, scenic and recreational resources — must be the cornerstone that guides our vision. We urge the Presidio Trust to put this vision first." (NPS Comment Letter, October 25, 2001).

Policy statements in support of this vision are detailed in PTMP Chapter One, Preserving & Enhancing Park Resources, and will protect the historic character and integrity of the NHLD, the Presidio's cultural landscape, and archaeological resources. Policies also assure that the Presidio will remain an open space haven, and open space and natural habitats will be preserved, enhanced, and increased. Ultimately, approximately 75 percent of the Presidio will become and be managed as open space, providing both natural habitat and recreational opportunities, values that in a densely urban area are often difficult to preserve and maintain.

Resource protection is a difficult goal in view of the challenge of generating revenues sufficient to operate, maintain, and sustain the Presidio without taxpayer support beyond 2013. Fulfilling the resource mandate demands that preservation and financial goals be balanced and integrated. The Trust could theoretically achieve financial self-sufficiency in any number of ways, as was shown in the financial analysis of the different alternatives in the EIS, but if it does so without establishing a financial base that is strong enough to ensure the timely rehabilitation of the Presidio's historic buildings and landscapes, the restoration of its natural resources, and the preservation of its historic character into the future, the Trust will not have accomplished its legally mandated role. In the Trust's judgment, the Final Plan Alternative provides the needed financial security and the flexibility to accomplish the mandate of resource preservation and protection.

## ***2. PTMP IS CONSISTENT WITH AND ACHIEVES THE TRUST ACT'S FINANCIAL MANDATE***

Caring for the Presidio will be costly and will involve managing a complex set of financial challenges and tradeoffs. Unlike the wild lands typical of many parks, the Presidio's resources need active intervention, investment and management to preserve their integrity. Historic buildings, the historic forest, scenic views, and natural habitats will deteriorate without timely investment in maintenance and restoration, and substantial investment is needed to create, restore and maintain open space. In establishing the Presidio Trust as a wholly-owned federal government corporation, Congress created an organization that could operate in the public marketplace, make real-time decisions, and reinvest revenues into the park in order to generate sufficient cash flow to eventually operate the park without federal appropriations after 2013.

The Trust Act requires that the Trust generate sufficient revenues to support its financial needs free of annual Congressional appropriations by the 2013 deadline and to sustain the Presidio financially into perpetuity. The Trust must fund all of its expenses with limited revenue sources, including gradually diminishing Congressional appropriations, U.S. Treasury borrowing — which must be appropriated and subsequently repaid — and lease revenues. Annual appropriations will gradually diminish and ultimately cease in 2013; thus lease revenues must increase substantially over time to make up for declining income. The Trust's success in meeting its financial mandate depends upon the real estate market, the quality and quantity of building space that is made available for lease, as well as the Trust's capacity to plan for, respond to, and manage financial uncertainty, variability and external forces. The rate at which the Trust invests in the preservation and enhancement of the Presidio's resources will also affect the Trust's ultimate success in protecting the park for future use. While each alternative studied may have had the potential for

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<sup>1</sup> The resource mandate of the Trust is found within section 104(a) of the Trust Act stating that the Trust must exercise the Trust Act's authorities "in accordance with the purposes set forth in section 1 of the [GGNRA] Act" (Public Law 92-589; 86 Stat. 1299; 16 U.S.C. 460bb). The GGNRA Act begins with a purpose to "preserve for public use and enjoyment certain areas . . . possessing outstanding natural, historic, scenic, and recreational values. . . ." It also seeks "to provide for the maintenance of needed recreational open space necessary to urban environment and planning . . ."

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financial success, in the Trust's view, PTMP provides the best balance between financial strength, financial flexibility, and the mandated non-revenue generating policy choices, and this creates a greater likelihood of successfully achieving the financial mandate of the Trust Act.

First, the PTMP provides a diverse land use/building use mix that can provide more stable and robust revenue potential than other plan alternatives. PTMP provides more residential leasing opportunities and the possibility to concentrate on residential cash flow to a greater extent than most other alternatives. Residential cash flows are more predictable and certain than non-residential cash flows, a fact made more evident by present market conditions and past financial experience of the Trust. Whereas most of the other alternatives would reduce housing units within the park, the PTMP allows up to 1654 residential accommodations, the same number that currently exist within the park. By comparison, the revenue component of most of the other alternatives evaluated may be less predictable because they have a smaller proportion of residential space. Two alternatives pose the further disadvantage of limiting the non-residential tenant pool to the types of tenants willing and capable of paying an average annual market-rate rent lower than other market-rate office rents, thus also limiting the non-residential revenue potential of these alternatives.

Second, the PTMP provides reasonable security that the park can be preserved and is flexible enough to respond successfully to market forces. The Trust must oversee the dynamic interaction among revenue generation, building rehabilitation costs, market conditions, and tenant leasing incentives. The Trust is also subject to the fluctuating conditions of the real estate market. When the market is strong, there will be more tenants willing to pay higher rents and to provide capital to improve Presidio buildings. When markets decline, as they inevitable and cyclically do, the Trust will face a greater challenge. Attracting tenants will be more difficult. It will be important for the Trust to create leasing conditions that attract tenants, but in the event the Trust overestimates its revenue targets or underestimates its costs, the Trust has concluded that the PTMP has the capacity nevertheless to achieve self-sufficiency and long-term sustainability.

Third, the PTMP offers other financial tools to manage real estate risk and financing of building improvements and other park objectives. The possibility of limited new construction is a financial management tool that in the Trust's judgment is prudent to retain among the mix of possible management practices. New construction can offer fewer financial risks than reuse of existing buildings, and can provide a reliable revenue stream to help finance historic preservation of adjacent or nearby buildings or activities. In all likelihood, new construction would be undertaken by third parties under a ground lease arrangement,<sup>2</sup> not directly by the Trust. With this arrangement, the costs of improvements are not borne by the Trust, nor does the Trust assume risks associated with potential cost overruns, vacancies, or declining rents. New construction can also help to obviate financial risks associated with historic rehabilitation, because a building addition or annex can help provide revenues to support the historic rehabilitation.

These advantages must be weighed against and balanced with its disadvantages — lower annual rent payments from a ground leasing arrangement, particularly in early years when tenant/investors are essentially paid back for their investment. The availability, nevertheless, of some limited new construction that could be used as a financing tool or as a means to shift real estate risk to third parties is, in the Trust's judgment, an important option that would be unavailable or overly restricted under some of the other alternatives.

In addition to the other financial reasons for preferring the PTMP is its theoretical capacity to respond successfully to financial variability and uncertainty.<sup>3</sup> PTMP offers the opportunity to minimize the time to completion of park resource and infrastructure enhancements and to begin building reserves earlier than other alternatives. Analysis also suggests

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<sup>2</sup> A ground lease is the right to use a land parcel for a definite length of time by a tenant who invests the necessary capital to develop and construct improvements (e.g., a building) on the site.

<sup>3</sup> The Trust developed a financial planning model for the limited purpose of comparing the general land use alternatives. The model was used to predict the theoretical capacity of each alternative to achieve short-term self-sufficiency by 2013 and the time needed to reach long-term sustainability, and to compare the financial performance of alternatives in terms of relative revenue generation capacity, time to completion of park enhancements, and estimated time needed to achieve a stabilized financial state. The extent and effects of uncertainty and variability were addressed through the use of modeling sensitivity analyses. Here, where the Trust's planning process involved a long 20- to 30-year planning horizon, the most useful modeling tool was one designed to compare financial performance based upon reasonable, conservative, but largely common assumptions, rather than a model designed to accurately predict future financial outcomes. Its results should be viewed as an indicator of relative performance only, not as a means to project actual, expected financial results. Recognizing these limitations of the financial planning model, the Trust views the results as informative but not controlling. Many other factors, as set out in this ROD, formed the basis for the Trust's decision to select the Final Plan Alternative, and the results of the financial analysis alone have not been dispositive of the selection decision.

that the PTMP's time horizon for completion of the capital program is more predictable than other alternatives with the smallest deviation in date of completion under different sensitivity tests such as revenue reduction, capital cost deviation, or variable operating expenditures. In the Trust's judgment, the PTMP provides the best approach to meeting the Trust's financial mandate.

### ***3. PTMP PROVIDES THE FLEXIBILITY TO RESPOND TO MARKET CHANGES AND OPPORTUNITIES***

PTMP provides sufficient flexibility in land use decisions to allow the Trust to tailor lease offerings to the demands and conditions of the real estate market. With a few exceptions, the PTMP does not prescribe building uses. It identifies preferred uses for certain key structures, but allows secondary uses to be considered, thus providing more leasing flexibility over the life of the plan than did the 1994 GMPA. If a preferred use cannot be realized, then PTMP allows the Trust to consider alternative uses without need of a lengthy plan amendment process. In lieu of prescribing building uses, the Trust has committed to seek continuing public input on future Presidio projects and proposals and to undertake site-specific and district-level planning efforts and environmental analysis as needed in the future. Other alternatives, specifically the No Action Alternative (GMPA 2000) and Final Plan Variant, are more prescriptive in allowable uses for Presidio buildings. The more prescriptive approach offers a greater degree of certainty as to building uses, but is not well suited to market forces and opportunities and financial variability, key factors that the Trust must manage over time. In the Trust's judgment, the PTMP best meets the Trust's needs to respond efficiently to the real estate market.

### ***4. PTMP PROVIDES AND IS CONSISTENT WITH PLANNING PRINCIPLES AND DISTRICT GUIDELINES***

PTMP sets forth planning principles that translate the resource protection vision of the plan into specific goals for managing Area B. The Planning Principles set forth the essential management objectives that will be applied as PTMP is implemented. The District Guidelines were developed based upon, and conform to, the Secretary of Interior's standards for the protection of historic and cultural resources. The District Guidelines correspond to the varied characteristics of each planning district and provide guidance on the treatment of open space, district character, views, access and circulation, and other physical characteristics. Future implementation actions of the PTMP will be assessed for consistency with the Planning Principles and the District Guidelines. In the Trust's judgment, the PTMP Planning Principles provide the best set of management guidelines for the Trust's future management of Area B of the Presidio.

### ***5. PTMP BUILDS ON THE EARLIER GMPA AND HAS TAKEN INTO ACCOUNT PUBLIC INPUT***

PTMP did not start from a blank planning program, but draws from and builds upon the 1994 GMPA to create an updated policy framework for Area B that balances and conforms the concepts and principles of the GMPA with the requirements and mandates of the Trust Act. Planning Principles within the PTMP are largely based on policies of the GMPA, including such commitments as preserving the NHLD, restoring Tennessee Hollow, creating a transit center at the Main Post, using sustainable practices, and many more.

The plan is also responsive to an extensive public participation process. The Plan involved more than two years of effort. In addition to the more than 600 letters received during six months of public scoping, the Trust received more than 3,000 comment letters as well as oral comments at two public hearings and a public meeting of the GGNRA Citizen's Advisory Commission during the 90-day public comment period on the Draft Plan and EIS. The thousands of public comments received were extremely useful in the planning process. The Trust is indebted to the creative and constructive comments that resulted in improvements to the Plan, such as the clearer statement of the Plan's vision, the strengthened commitment to protection of the NHLD, and the change of the name from PTIP to PTMP to better reflect the programmatic nature of the Plan, among others.

Many organizations and individuals have acknowledged the meaningful changes made in response to public comments on the Draft Plan or have expressed the point of view that the Final Plan Alternative is an appropriate balance of a complex mix of resource protection and financial goals and requirements. See Attachment 2 (Report Accompanying the

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ROD) at Section II.A. As an example, the U.S. Environmental Protection Agency writes: “In our review of the FEIS, EPA found 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 competing visions for Area B of the Presidio.” (EPA letter, June 24, 2002). In the Trust’s judgment, the PTMP is the best combination of elements from the 1994 GMPA and updates to it that overall successfully balance many different, and often competing, public comments.

## **6. PTMP IS GOOD HOUSING POLICY**

PTMP, unlike some other alternatives considered, recognizes that housing is essential to the historic character of the Presidio. Over 40 percent of the building space at the Presidio is presently housing stock. People have always lived at the Presidio, and the park’s homes, many of which are historic, are an essential feature of its cultural landscape and critical to its character. Throughout the Presidio today, there are 1,116 conventional dwellings and 538 group quarters (i.e., barracks and dormitories). Approximately 80 percent of the dwellings and 25 percent of the group quarters have been occupied within the last year. All of these accommodations were occupied by the Army, and are reflected in the 1990 Census, which reported a Presidio population of 4,700 just after base closure was announced. Maintaining residential use in the Presidio residences is good land use planning practice; residents add to the vitality, safety, and security of the Presidio. Residential use is a cost-effective way to reuse and preserve many historic buildings that are already configured as or may potentially to be converted to residences.

PTMP will also maintain the supply of housing that most other alternatives would have reduced. This is good environmental policy because, housing Presidio-based employees close to where they work serves to reduce and minimize automobile traffic in and out of the park, and in so doing reduces traffic and air quality impacts. The PTMP housing component is also good public policy. Growth in the San Francisco Bay area throughout the last decade has put stress on the regional housing market, which has historically ranked as one of the most expensive in the country probably due to population and employment growth and lack of developable land. PTMP addresses Presidio employee housing demand and reduces potential spillover impacts on the regional housing supply to a greater extent than other alternatives. It also accommodates a broad spectrum of housing opportunities and tenants with a range of income levels through its affordable housing policies and plans for changes over time in the composition of housing at the Presidio. In expressing support for PTMP’s housing component, the San Francisco Housing Action Coalition (SFHAC) writes: “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 . . . . As the Presidio creates new jobs, it is important that housing units are provided . . . “ (SFHAC letter, June 3, 2002).

Using Presidio building space for housing is also important to the Trust’s authority to meet its financial mandate. Lease revenue from residential use is the most reliable long-term source of revenue. With PTMP, a greater proportion of Presidio building space — about one-third — will be in residential use, thus offering the stable revenues needed for park operations, resource preservation, and other goals and objectives.

PTMP offers, in the Trust’s judgment, the best plan for housing removal and replacement. Most of the alternatives considered the removal of Wherry housing to allow natural resource enhancements. PTMP goes further by allowing the removal of other non-historic dwelling units to achieve greater natural resource enhancements. PTMP also permits replacement of removed housing units to allow the Trust to address Presidio-based housing demand, minimize effects on regional housing supply, and meet other planning objectives (e.g., rehabilitation of an historic structure). A significant portion of the replacement housing is expected through subdivision and conversion of existing building space. PTMP also offers the option of replacing between 200 and 400 units within new structures. The Trust views this potential for newly constructed units as important not only to meet housing demand but also to offer the potential to improve the aesthetic and historic qualities of the park, make housing more accessible to public transit, and meet other objectives of the Plan (e.g., to reinforce an historic landscape pattern).

## **7. PTMP PERMITS A WIDE RANGE OF POTENTIAL TENANTS**

PTMP best addresses the tenant selection requirements of the Trust Act<sup>4</sup> and balances these requirements with other policy goals. The pool of potential tenants is already limited by the Presidio's location and by the complexities of its available building space. The historic nature of many Presidio buildings limits their suitability for certain types of tenants, as does their layout and capacity for structural changes. Tenants, even if interested, may not have the capital to rehabilitate the space. In addition, the Presidio is not as close to downtown San Francisco or as accessible by transit services as other competing locations. Restricting the pool of tenants further makes the revenue and preservation missions of the Trust more difficult. Seeking a diverse range of tenants is the most prudent policy; it also mitigates the effect of economic downturns, weakness in or demise of any particular real estate sector, and changing social trends. PTMP commits to tenant diversity, and expands the pool of prospective tenants that may be willing to locate at the Presidio, including tenants that may be willing to provide the means to rehabilitate the Presidio's buildings and landscapes. It goes beyond any single type (e.g., non-profits) or purpose (e.g., addressing world problems) as set forth in the 1994 GMPA. In the Trust's judgment, diversity without quotas or prohibitions other than the principles set forth in the Plan and in the Trust Act will create a more robust and stable base of tenants, making the preservation of park resources more feasible.

## **8. PTMP PROVIDES FOR PUBLIC USE AND ENJOYMENT OF THE PRESIDIO**

The Presidio was set aside as a park of national stature and a place for public enjoyment. PTMP makes the park accessible to the many not the few by proposing many ways for the public to use the park. PTMP plans for roughly one-third of the building space, a larger proportion than some other alternatives, to be used for public-serving use, such as cultural and educational uses, recreation, small-scale lodging, and other visitor amenities. In addition, the PTMP commits a greater level of financial support to programming for the public than some other alternatives in order to ensure that the Presidio can become accessible to a wide variety of people and interests.

PTMP envisions and commits to an array of public programs developed through the collaborative efforts of the Trust, the NPS, tenants, and other partners with program expertise. Relying predominantly on tenants to bring people to the park, as assumed by some of the other alternatives, may not provide the consistency, quality, or coherence that visitors to a national park deserve and expect. PTMP allows tenants to provide programs, but recognizes that tenants have their own missions and priorities, and that tenants themselves will come and go. If programs are to be consistent year after year, dynamic and diverse, responsive to the interests of the broad public yet specific to the place, the Trust believes that the Trust and NPS must be the primary coordinators of public programs.<sup>5</sup>

Among its visitor serving uses, PTMP provides for a modest amount — less than, for example, the No Action Alternative (GMPA 2000) — of different kinds of lodging in different locations of the Presidio. Rehabilitating certain Presidio structures for reuse as overnight accommodations is both an effective strategy for reuse of an historic building and a traditional use within national parks. To allow visitors to the Presidio the opportunity to stay overnight in an historic structure is a qualitatively different way to experience the park and is not comparable to accommodations offered outside the park's gates. The Trust views the modest lodging goals of the PTMP as desirable within the mix of visitor-serving uses.

## **9. PTMP ENSURES THE PROTECTION OF THE PRESIDIO NATIONAL HISTORIC LANDMARK DISTRICT**

In recognition of the Presidio's historic significance, PTMP makes an unequivocal commitment to protection of the NHLHD status. Any changes within the landmark district will comply with the National Historic Preservation Act and be

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<sup>4</sup> Section 104(n) of the Trust Act sets out specific tenant selection criteria: "The Trust shall give priority to the following categories of tenants: Tenants that enhance the financial viability of the Presidio and tenants that facilitate the cost-effective preservation of historic buildings through their reuse of such buildings."

<sup>5</sup> The Trust Act mandates that the NPS and the Trust cooperatively provide public interpretive services, visitor orientation, and educational programs. The Trust is committed to working with NPS; coordination with NPS will be focused on those areas where both NPS expertise and available resources can be optimized.

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compatible with the park's setting. No changes will be undertaken that could affect the District's overall status or integrity — this includes demolition, new construction, and other physical changes within the District.

The best way to preserve historic buildings is to reuse them, and PTMP will ensure that historic buildings are rehabilitated and filled with adaptive and feasible uses to the maximum extent feasible. Historic structures may be rehabilitated for use as offices, housing, lodging, and the full variety of other building uses allowed under the Plan. In addition, PTMP will protect the Presidio's cultural landscapes, and undertake necessary enhancements, such as the planned rehabilitation of the historic forest. In the Trust's judgment, PTMP best meets the Trust's responsibility to protect the historic and cultural resources of the Presidio.

## ***10. PTMP EMBRACES THE CONCEPT OF SUSTAINABILITY***

The PTMP embodies the concept of sustainability by striking a balance between economic, social, and environmental issues — the three pillars of the sustainability concept. It meets the current needs of the park without compromising the quality of the park experience for future generations. Over the long-term, the Plan will make the Presidio a demonstration and education site for how open space with high biological value can be conserved and maintained in an urban area. PTMP also embraces sustainable practices and environmentally sound technologies in maintaining and operating the Presidio's facilities. The Presidio Trust is developing transportation strategies to minimize automobile use. The Plan includes an aggressive transportation demand management (TDM) program, including more options for public transit and pedestrian and bicycle travel, housing in the park for Presidio-based employees to limit traffic trips and minimize effects on air quality, and parking management as a tool to discourage automobile use and promote more sustainable means of travel. PTMP also applies sustainable building design and technology to rehabilitating structures and relies on safe and efficient energy generation, conservation practices, and recycling, salvage and solid waste reduction to create resource-efficient environments.

## ***11. PTMP BEST BALANCES DIFFERING VALUES/MANDATES***

*Resource protection and financial security:* The Presidio is expensive to operate and maintain. The large number of buildings and the improvements and services needed by Presidio occupants — roads and sewers, landscape maintenance, as well as rehabilitation and upkeep of the buildings themselves — make the Presidio among the most expensive national park sites. Resource protection and the financial means to achieve it are fundamentally interdependent. If either objective is viewed alone, it gives a distorted picture of what the Trust must accomplish. If the Trust adopts a plan that can achieve self-sufficiency without creating a financial base that ensures the protection and enhancement of the Presidio's resources, the Trust will not have accomplished the goals set forth by Congress. Conversely, the Trust can devote the monies currently at its disposal to enhancing the Presidio's resources, but if it does so without taking great care to provide for long-term financial sustainability, then the Presidio will not survive as a national park site. Examples are abundant: the historic forest is a natural resource, a cultural resource, a scenic resource, and a capital asset in need of substantial capital investment. Historic buildings are both cultural resources to be preserved and revenue sources to be developed. This balance defines the nature of the Trust and the Plan that it is adopting: all decision-making under the PTMP will take into account the balance between financial and resource protection factors and the effects on future generations. In the Trust's judgment, PTMP strikes the optimum balance; it values the diverse resources of the Presidio by making their protection and enhancement the centerpiece of the Plan vision, but allows for sufficient revenue generating assets in the form of building space to reasonably assure that the Trust can diversify its revenues and sustain the Presidio indefinitely.

*Open space and developed space:* PTMP strikes a reasonable balance between open space and developed space. The Plan will increase open space by about 100 acres over time and will result in about 75 percent of the Presidio (Area A and B) being devoted to valuable natural habitat and recreational opportunities. Other alternatives would have created up to 40 acres more open space than PTMP, but doing so would have come at the cost of reducing total building space, reducing the revenue generating potential of the Trust and reducing the Trust's ability to achieve other important goals such as maintaining housing for Presidio-based employees, and providing a wide array of public uses and programs. Also, some alternatives that prioritize open space to a greater degree than the PTMP would run the risk of removal of

significant historic buildings and potential impairment of the integrity of the NHLD to achieve the enhanced open space objective. To do so is unacceptable.

*Balanced Use of Building Space:* PTMP balances the possible building uses. Buildings contribute to the Presidio’s National Historic Landmark District status and their rehabilitation will generate revenues necessary to support the park. For all of the reasons outlined (Section IV.A.6), the Plan commits about one third (a larger proportion than any other alternative) of the Presidio’s building space to residential use. The Plan balances the remainder with one-third identified as office use and one-third for public-serving uses. In the Trust’s view, a great national park exists to serve the public. Therefore, PTMP places greater emphasis on public-serving uses than most other alternatives, and provides for a balance between revenue generating uses and public uses.

*Cultural and Natural Resource Protection:* PTMP balances the protection of cultural and natural resources. To significantly enhance natural resources beyond the commitments made in the Plan could involve the removal of historic buildings, adverse changes to the cultural landscape, and — if substantially more non-historic housing is removed — construction of more replacement housing. The Trust believes it has found the appropriate balance between cultural resource protection and natural resource values in selecting the PTMP.

*Environmental advantages versus disadvantages:* The Trust has disclosed and weighed the environmental effects of the alternatives against the potential of each alternative to adequately meet the needs and objectives of the Trust so as to protect the Presidio over the long-term. The PTMP strikes an appropriate balance between beneficial and adverse effects, and — with mitigation — will not result in significant environmental impacts. Environmental advantages include commitments to protect the NHLD, to restore Tennessee Hollow, to restore native habitats and enhance their connectivity, to rehabilitate the historic forest, to conserve energy, water, and other natural resources, and many more. In contrast to other alternatives, the PTMP provides assurance that these advantages can be realized even if circumstances change, and that they can be accomplished within a reasonable time frame.

## **B. REJECTION OF OTHER ALTERNATIVES**

In addition to the bases set out above for selecting PTMP as the updated land use policy framework for Area B of the Presidio, the Trust has considered the following factors in choosing not to select other alternatives.

### **1. NO ACTION ALTERNATIVE (GMPA 2000)**

In the Trust’s judgment, the No Action Alternative (GMPA 2000) does not provide the necessary tools to meet the difficult financial and management challenges associated with the Trust’s mandate for preservation and financial self-sufficiency.

*Insufficient Leasing Flexibility:*<sup>6</sup> The GMPA envisioned “a park unlike any other” and prescribed that the Presidio should not simply be preserved but should become a “global center” where tenants would be devoted to “addressing the world’s most critical environmental, social, and cultural challenges.” (1994 GMPA p. v). Consistent with the GMPA, the GMPA 2000 Alternative emphasizes tenant selection based upon this vision, whereas the Trust Act requires consideration of leasing criteria not considered a priority under the GMPA. The Trust must “give priority” to tenants that “facilitate the cost-effective preservation of historic buildings through their reuse” and must look for credit-worthy tenants with the demonstrated financial means to help achieve the Presidio’s “financial viability.” See footnote 4. The GMPA vision, requiring tenants to have a business mission related to solving world problems unduly limits an already limited pool of tenants willing to locate at the Presidio and to contribute toward the rehabilitation of its buildings and landscapes. If the Trust were to adopt the GMPA 2000 Alternative, the tenant pool would be constrained to those who fit within the overlap of both the GMPA and Trust Act tenant categories. While undoubtedly there are some additional tenants beyond those that have already leased space at the Presidio who fit both the GMPA and Trust Act criteria and may be willing to sign long-term leases, their number is limited. Given the Trust’s formidable financial challenge, the Trust believes that

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<sup>6</sup> This same rationale is a basis for not selecting the Final Plan Variant.

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such a constraint on potential tenancies creates unnecessary risk to the Trust's ability to discharge its foremost responsibility — the timely preservation of the park's resources for the public in perpetuity. In consideration of the significant costs of preserving and enhancing the Presidio's historic and natural resources and improving and maintaining its extensive infrastructure, the Trust does not wish to constrain its financial options in this way and has chosen a Plan that provides more leasing flexibility.

*Reduction of Housing Supply:*<sup>7</sup> The No Action Alternative (GMPA 2000) would dramatically reduce the supply of housing within the Presidio, and would significantly reduce the Presidio's capacity to satisfy Presidio-based employee demand for housing. The Trust needs a plan that recognizes that housing is essential to the character of the Presidio and to its fiscal well being, and that would therefore maintain the supply of housing that the GMPA-based alternative would have eliminated.

*Idealistic approach to public programming:*<sup>8</sup> The GMPA assumes that the majority of public programs for park visitors would be provided by park tenants. The Trust views this approach to providing visitor programs as idealistic and impractical. Tenants have their own missions and priorities that change, and tenants themselves come and go. If programs are to be consistent year after year, dynamic and diverse, responsive to the interests of the broad public yet specific to the Presidio, the Trust concludes that the Trust and NPS must be the primary coordinators of public programs. See Section IV.A.8.

## 2. FINAL PLAN VARIANT

*Jeopardizes historic resources and is not sustainable:* The Variant proposes a reduction in overall building square footage from today's 5.96 million square feet to 4.7 million square feet (900,000 sf less than PTMP), and calls for demolition of a number of historic buildings that contribute to the NHLD status to achieve the reduction in building space, as well as a number of non-historic buildings that can easily be reused to generate revenue or meet other public purposes. Prioritizing the reduction in building space to the extent called for in the Variant does not meet the Trust's goals for historic preservation. Tenets of historic preservation and principles of sustainability articulated in both the GMPA and the PTMP allow for the retention and reuse of viable buildings, and a better balance between open space and developed areas.

*Constraints on new construction:* The Variant precludes new replacement construction for any purpose over the life of the plan, and this constraint is impractical.<sup>9</sup> The Variant forecloses the possibility of replacing housing units removed to meet other resource protection goals, except through subdivision and conversion of existing space. At some point, subdivision and conversion of more marginally suited structures to obtain the planned number of housing units will become economically infeasible and may jeopardize the protection and integrity of individual historic structures. For non-residential space, the Trust considers new construction to be a desirable management option to provide for the feasible and adaptive reuse of the Presidio's historic buildings and to serve as a financial management tool for shifting real estate risk. Just as the NPS discovered when it determined that reuse of the historic Presidio fire station necessitated a new addition, the Trust expects that making the rehabilitation and reuse of historic buildings functionally and financially feasible may at times require the addition of newly constructed space. The Variant appears to foreclose these options, which are necessary to meet the Trust's needs.

*Reduction of revenue generating assets:* The Final Plan Variant places the highest priority on the creation of open space, calling for greater building demolition so as to achieve less built space than any other alternative, even less than the original GMPA from which this Plan is developed. Buildings are the Trust's primary revenue generating assets, and removing this much building space is in the Trust's view financially imprudent. Furthermore, reducing building space to this extent is not necessary to accomplish mandated resource protection or to expand open space and restore natural areas of the park.

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<sup>7</sup> This same rationale is a basis for not selecting the Final Plan Variant and the Resource Consolidation Alternative.

<sup>8</sup> This same rationale is a basis for not selecting the Final Plan Variant.

<sup>9</sup> New construction includes any additional square footage that is added outside of the existing building envelope, whether as an addition to an existing building, as an annex, or as a freestanding structure.

### **3. RESOURCE CONSOLIDATION ALTERNATIVE**

*Adverse effect on NHL District:* The Resource Consolidation Alternative calls for the highest level of building demolition of any alternative — substantially more than under either the No Action (GMPA 2000) or Final Plan Alternatives. The Alternative would include removal of all buildings within the entire Public Health Services Hospital Planning District, including the historic former hospital and its associated seventeen historic outbuildings to create open space. Demolition of the PSHS complex, including removal of all historic buildings and cultural landscapes would constitute an adverse effect on the NHL. The Trust has chosen not to adopt an alternative that, while maximizing natural resource enhancements, adversely affects contributing buildings and cultural landscapes, and potentially jeopardizes the integrity of the NHL status.

### **4. SUSTAINABLE COMMUNITY ALTERNATIVE**

*Highest level of environmental effects* — The Sustainable Community Alternative, resulted in the worst air quality, highest noise levels, and highest traffic levels. When the Trust developed the Sustainable Community Alternative, it did so with a concept of sustainability in mind, and developed a mix of uses consistent with the concept. The concept of sustainability suggested that a high percentage of people would live close to their workplace to minimize traffic and auto trips. As a result, this alternative included a higher percentage of office, residential, and retail uses than other alternatives. The Trust did not anticipate the environmental outcome of this use mix, but the evaluation presented in the Final EIS indicates that this Alternative results in greater potential environmental effects than other alternatives. In the Trust’s judgment, the adverse impacts on environmental quality associated with this Alternative, when considered as a whole, are unacceptable.

### **5. CULTURAL DESTINATION ALTERNATIVE**

*Overemphasizes development in the northern part of the park:* The Cultural Destination Alternative called for a high level of physical change within the park through a relatively high level of demolition, concentrated in the southern portion of the park, and replacement of all removed building space through new construction and infill development within the northern part of the park. Although creating greater density of development near work and transit is a desirable land use planning principle, in a park setting like the Presidio, the Trust believes moderation is warranted. Like the Sustainable Community Alternative, this alternative also resulted in a higher level of overall environmental impacts than the Trust finds acceptable. The Trust therefore designed the Final Plan Alternative to strike a better balance among the level of physical change within the park, the level of allowable new construction, and a land use pattern that would support a sustainable and somewhat more compact live-work community.

*New construction in NHL:* The Cultural Destination Alternative calls for the highest level of new replacement construction within the park setting. Although these changes could be proposed and designed to be compatible with surrounding buildings and the NHL, the Trust desires a Plan with a more moderate allowance of new construction to be used in those instances where it can be targeted to achieving specific policy goals of the Plan.

### **6. MINIMUM MANAGEMENT ALTERNATIVE**

*Prioritizes financial result:* This alternative would result in little physical change to the Presidio and no significant resource enhancements other than to meet minimal legal requirements. The alternative assumes leasing for “highest and best” use to maximize revenues, and places little emphasis on resource protection or enhancements. The strength of this alternative is in its financial capacity, but in the Trust’s view, this alternative maximizes revenues at the expense of other needs and plan objectives. It does not reflect the importance of the natural resource, public access, or other programmatic goals for the Presidio, and is rejected for these reasons.

## **C. CONCLUSION**

For all of the reasons outlined, PTMP meets the project’s purpose and need, and among the considered alternatives, it is the one that in the Trust’s judgment best 1) provides a planning framework well-suited to and consistent with the

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statutory requirements for Area B enacted by Congress in the 1996 Presidio Trust Act; 2) assesses and integrates changes that have occurred since NPS' 1994 plan for the Presidio became final ; and 3) revises the governing plan for Area B to include the management policies and approaches and needs of the Trust.

## V. MEASURES TO MINIMIZE POTENTIAL ADVERSE ENVIRONMENTAL IMPACTS

All practicable mitigation measures identified in the Final EIS to avoid or minimize environmental impacts that could result from implementation of the PTMP will be carried out. These mitigation measures are discussed in greater detail at the end of each impact analysis in Section 4 of the Final EIS and include all relevant measures from the GMPA EIS and additional measures that were identified during the course of the analyses to further reduce potential impacts.

As part of the decision to implement PTMP, the Trust is adopting a Monitoring and Enforcement Program (MEP) to monitor impacts and mitigation during plan implementation. The MEP provides for the implementation of the mitigation measures as proposed in the Final EIS, where these measures are within the ability of the Trust to implement. Where measures fall outside of the Trust jurisdiction, this fact is noted, along with a description of ways in which the Trust will assist and encourage other agencies to implement these measures. The MEP has been formatted as a table, and is appended to this ROD as Attachment 1, with the following information:

- Mitigation Measure – Taken directly from Section 4 of the Final EIS;
- Timing of Implementation – Applicable milestone or phase when mitigation measure will become applicable;
- Responsibility for Implementation – Agency with jurisdiction and (where known) individual who will ensure that the mitigation measure is accomplished;
- Method of Implementation – How action will be implemented; and
- Monitoring and Enforcement – How implementation of action will be monitored and enforced.

The Trust's NEPA Compliance Manager will be responsible for monitoring compliance with the MEP. For measures outside the jurisdiction of the Presidio Trust, the MEP will ensure coordination with other agencies (for the most part, the NPS and the City and County of San Francisco), and will monitor and facilitate their implementation of measures. The status and results of mitigation monitoring will be made available to other agencies and to the public upon request.

## VI. PUBLIC INVOLVEMENT AND AGENCY COORDINATION

Public involvement and comment have been critical in shaping the updated plan for the Presidio's future. The following section describes chronologically the public involvement program for the PTMP and EIS.

### A. PUBLIC INVOLVEMENT

The process of updating the comprehensive plan for the portion of the Presidio under the Trust's jurisdiction took more than two years, and encompassed nine formal public meetings, thousands of public comments, and considerable public debate.

## 1. SCOPING PERIOD

*Federal Register Notices and Scoping Period:* Planning officially began on June 30, 2000, with a Federal Register notice of intent to prepare a Supplemental EIS<sup>10</sup> for the Draft Plan, and to hold two public scoping meetings to determine the scope of impact topics and alternatives to be addressed in the Draft EIS (65 FR 40707-08). On October 11, 2000, the Trust published in the Federal Register a second notice to add a third public scoping meeting, to make factual corrections, and to extend the previously announced scoping period from November 15, 2000 to December 8, 2000 (65 FR 60477-60478). In response to several requests from commenting organizations and members of the public, the Trust announced in a third Federal Register notice an additional extension of the public scoping period to January 15, 2001, to enable the public to fully review, evaluate, and comment on the alternatives prior to their being analyzed in the Draft EIS (65 FR 67783).

*Public Workshops:* To ensure identification of the full range of issues and alternatives related to the Draft Plan and Draft EIS, the Trust invited all persons affected by or otherwise interested in the updated plan to participate in determining the scope and significance of issues to be analyzed in the Draft EIS by submitting written comments, or by attending one or more of four community workshops. During the extended 6-month scoping period, about 470 people attended the workshops, many of whom provided written and oral comments during the meetings. The Trust announced the times and locations of the workshops in a variety of media, including publication in the Federal Register and the Presidio Post (the Trust's monthly publication), notification to persons on the Trust's mailing list (approximately 9,000 persons and organizations at that time) and those that called or wrote requesting notice of subsequent events concerning the planning process, and posting on the Trust's web site ([www.presidiotrust.gov](http://www.presidiotrust.gov)).

At the first scoping meeting, held on July 12, 2000, the Trust provided information summarized from past planning workshops and other public outreach sessions, and sought the public's input on topics including Planning Principles, Presidio programs, transportation, housing, visitor services, and land use for purposes of both developing a reasonable range of alternatives, and identifying specific impacts to be evaluated in the Draft EIS. During the second workshop, held on September 13, 2000, the Trust focused on the Trust Act's financial self-sufficiency mandate, and introduced the financial modeling approach to be used to compare the planning alternatives. At that workshop, the Trust summarized and solicited comments on financial modeling concepts that would be used to assess, confirm and compare the financial viability of each alternative evaluated in the Draft EIS. After the July and September workshops, the Trust distributed mailers seeking public comments on both workshop topics, and provided a summary of public comments from the July workshop.

Using the information from the first two workshops and other public input, the Trust proposed for public comment the conceptual alternatives to be addressed in the EIS, and proposed visions for the Presidio's future at a third workshop held on November 15, 2000. The fourth and final workshop during public scoping was hosted on December 13, 2000, at which time the Trust responded to clarifying questions and listened to comments on the information presented to date. The Trust made available for public review and inspection complete transcripts and copies of the materials from the September, November, and December workshops on the Trust's website and at the Trust's library.

*Conceptual Alternatives Workbook:* As part of the third scoping workshop, the Trust released the Conceptual Alternatives Workbook to summarize the information presented at the November 15, 2000, workshop. The purpose of the workbook was to seek public input on topics that would form the foundation of the plan update and environmental review. The first part of the workbook summarized information about the planning process and context. Next, key elements of the plan update — the Trust's proposed vision statement and Planning Principles — were presented for public review and comment. Finally, five preliminary conceptual plan alternatives were presented. The workbook also included a response form for use by the public to evaluate the concepts presented, select ideas they believed to be best for incorporation into the Draft EIS alternatives, and to describe their own concept of a plan alternative if not already represented among the alternatives proposed.

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<sup>10</sup> In accordance with 40 C.F.R. § 1502.4, the PTMP EIS tiers from and supplements the Final GMPA EIS prepared by and finalized by the NPS in 1994 and considers the environmental effects of proposed changes to the GMPA under each alternative. For ease of reference, the PTMP EIS is referred to herein and throughout the planning process as the EIS rather than the Supplemental EIS.

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In presenting the conceptual alternatives for public consideration, the Trust, using a 20-year financial model common to all alternatives, provided a preliminary financial analysis for each alternative. To fully explain the summary financial results, the Trust also provided financial spreadsheets detailing the financial inputs, and made publicly available a compendium of all financial assumptions, together with supporting documents, used in assessing the financial viability of each alternative. Each of the detailed preliminary financial summaries was made publicly available prior to the final public scoping workshop. By this means, as part of scoping, the Trust received and considered comments on the approach to the financial comparison of alternatives.

## **2. PUBLIC REVIEW OF DRAFT PLAN AND DRAFT EIS**

*Inviting Public Comment:* The Trust released the Draft Plan and Draft EIS for public review and comment on July 25, 2001. On that date, the Trust held a widely noticed public meeting to brief the public on the contents of the Draft Plan and Draft EIS, and to encourage participation in the review process. Copies of the documents were distributed at the July 25 meeting, as well as information on the upcoming public hearings, the closure date for the comment period, and other pertinent information. The Environmental Protection Agency (EPA) published a notice of availability for the Draft EIS in the Federal Register on July 27, 2001 (66 FR 39161). The Trust also published a notice of availability in the Federal Register on July 26, 2001 (66 FR 39058-59) and announced through other means the availability of the Draft EIS, where and how it could be reviewed, and the date and location of public hearings to comment on the document. An announcement was also provided in the Presidio Post (the Trust's monthly publication) and on the Trust's web site ([www.presidiotrust.gov](http://www.presidiotrust.gov)).

The Presidio Trust initially provided a 60-day comment period for the Draft EIS ending September 25, 2001. In response to several requests from commenting organizations and other parties, the Trust elected to extend this period by 30 days to October 25, 2001 (66 FR 46296). The Trust provided the longer 90-day review period to further enhance the opportunities for public and agency participation in the NEPA process. More than 700 Draft EISs were distributed to interested agencies, organizations and individuals. The Draft EIS was also made available for review at the Presidio Trust library, park headquarters, local libraries, the Presidio's William Penn Mott Visitor Center, and on the Presidio Trust's website ([www.presidiotrust.gov](http://www.presidiotrust.gov)).

*Public Hearings:* Members of the public interested in making oral comments for the record were provided that opportunity at three public hearings: a Golden Gate National Recreation Area Citizens' Advisory Commission meeting held on August 28, 2001; a Presidio Trust Board of Directors meeting on September 17, 2001; and a Presidio Trust public hearing on October 16, 2001 (official transcripts from the three formal meetings are available for review in the Presidio Trust library). In addition, the Presidio Trust held a number of informal meetings with various government agencies, organized interest groups, and neighbors to provide information, answer questions, and encourage written comments.

*Public Comment:* During the extended 90-day public review and comment period, the Trust received a total of 264 comment letters, 135 e-mails, and 2,657 electronic form letters on the Draft EIS and Draft Plan. In addition, oral comments were provided at the three public hearings held during the review period. Comments ranged from individual recommendations, opinions or preferences for the various alternatives to criticism of the Draft Plan and Draft EIS. The Trust carefully reviewed, evaluated, and considered all of the public comment, and Volume II of the Final EIS (Response to Comments) is dedicated to summarizing and responding to these comments. In responding to public comments, the Trust made several refinements to the Plan and EIS, and an overview of the primary changes is provided in the Introduction to the Final EIS. For a detailed discussion of the public comments, responses, and changes made to the Plan and EIS, please refer directly to the EIS Response to Comments (Volume II).

## **3. RELEASE OF FINAL EIS AND PROPOSED FINAL PLAN**

The Trust released the Final EIS together with the proposed Final Plan document at a public meeting of the Trust's Board of Directors held on May 21, 2002. Notice of the meeting and of the availability of the Plan and Final EIS was widely distributed in advance by publication in the Trust's monthly newsletter, the Presidio Post, and in the Federal Register (67 FR 20846 (April 26, 2002)(Notice of Public Board Meeting) and 67 FR 32070 (May 13, 2002)(Notice of

Availability of the PTMP and Final EIS)). At the meeting, the Trust summarized major comment themes on the Draft Plan and EIS and noted modifications to the text of the Plan and related adjustments to the EIS that had been made in response to public comment. EPA published its Notice of Availability of the PTMP Final EIS (67 FR 36592) on Friday May 24, 2002, starting the 30-day “no-action” and review period for the Final EIS required by NEPA.

In order to allow the public an opportunity to ask questions and express views to the Trust on the proposed Final Plan, the Trust held a second public meeting of the Trust’s Board on June 13, 2002, concerning the Final Plan and EIS. The Trust announced the meeting at the public session on May 21, 2002, as well as in the Presidio Post and the Federal Register (67 FR 36939 (May 28, 2002)).

The Trust received a variety of public input during the “no-action” period for the Final EIS, and has determined that none of the input raises any new issues or new concerns that would warrant modifications to the Final Plan or EIS. See Section VIII, below and Attachment 2 (Report Accompanying the ROD) for more detail.

## **B. AGENCY COORDINATION AND CONSULTATION**

In November 2000, the Trust provided background information regarding the planning and environmental review process for the Draft Plan, including the Conceptual Alternatives Workbook, to federal, state, regional, and local agencies and requested their participation in “scoping” the plan update. The Trust consulted with interested agencies throughout the planning process.

### **1. COORDINATION WITH NPS**

During the course of the planning and environmental review process leading up to the Draft Plan and Draft EIS, the Trust held regular coordination meetings with the NPS. The intent of the meetings was to exchange information on key issues of interest to both agencies. The Trust provided funding support for a planning liaison within the NPS. The liaison coordinated input to the Trust from all NPS branches during preparation of the Draft EIS, and helped identify and address key Plan issues that would affect Area A of the Presidio.

NPS reviewed and provided comments on the Trust’s written scoping materials, including the Conceptual Alternatives Workbook summarizing proposed alternatives for study. After the close of scoping, the Trust held several focused sessions to review how the Trust was addressing NPS’ scoping comments and comments on the EIS alternatives and on preliminary draft sections of the Plan. Trust staff with specific technical expertise met with counterpart staff within NPS to ensure technical and factual information was reviewed and adjusted. The Trust also hosted several focused sessions with NPS on the following topics: open space/natural resources. interpretation/programs, transportation and parking management, cultural resources, and sustainability. Each of the sessions included informal presentations, review of existing policies and proposed principles, and discussions on the subjects. Further meetings with NPS focused on receiving comments on the internal administrative review draft of the Draft Plan and the Draft EIS.

Trust staff briefed their NPS counterparts on the contents of the Final Plan proposal as it was being developed, and explained the ways in which key NPS comments and concerns were being addressed in modifications to the Plan. Although Trust staff did not always come to full agreement with NPS staff during the planning process, NPS’ views were an important influence on the outcome. The Final Plan’s focus on resource preservation was largely in response to the NPS’s suggestion: “The Presidio’s unique park character — its significant cultural, natural, scenic and recreational resources — must be the cornerstone that guides our vision.” (NPS comment letter to Trust, October 25, 2001).

### **2. CONSULTATION UNDER THE NATIONAL HISTORIC PRESERVATION ACT**

The Trust initiated National Historic Preservation Act (NHPA) consultation early in the planning process with the State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation (ACHP). The consultation resulted in a Programmatic Agreement covering operations, maintenance, leasing, and rehabilitation activities as well as a framework for addressing future planning and implementation activities under PTMP. See Volume III of the Final EIS,

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Appendix D. Parties to the Programmatic Agreement include the SHPO, ACHP, NPS, the Trust, and two concurring parties: the National Trust for Historic Preservation and the Fort Point and Presidio Historical Association.

### **3. *ENDANGERED SPECIES ACT CONSULTATION WITH USFWS***

The Presidio provides a variety of habitats that support species protected pursuant to the Federal Endangered Species Act (ESA) of 1973, as amended. 16 U.S.C. §§ 1531 *et seq.* The Trust initiated consultation under Section 7 of the ESA with the U.S. Fish and Wildlife Service (USFWS) to ensure that the proposed plan update would not jeopardize the continued existence of listed species or critical habitat. The Trust submitted a Biological Assessment to the USFWS on November 26, 2001. On July 23, 2002, the USFWS issued its opinion letter stating “After reviewing the . . . effects of the proposed action and the cumulative effects, it is the Service’s biological opinion that the project, as proposed, is not likely to jeopardize the continued existence of these species.” Minimization measures included in the opinion letter mirror those included in the MEP provided for in Section V, above. A copy of the USFWS opinion letter is available for public review, and is incorporated herein by reference.

### **4. *CONSULTATION WITH BCDC REGARDING COASTAL ZONE CONSISTENCY***

Although the area under Trust jurisdiction does not lie within shoreline areas, as defined by the McAteer-Petris Act, the Trust is required to review activities that may affect the Coastal Zone for consistency pursuant to the federal Coastal Zone Management Act. The San Francisco Bay Conservation and Development Commission (BCDC), the agency responsible for the coastal zone management program, is entitled to concur or object to the Trust’s finding of consistency. The Trust included a finding of consistency in the Final EIS (Section 5.2.2), and submitted its determination to BCDC for review. The BCDC held a public hearing on the determination on July 18, 2002, and concurred with the Trust’s findings on August 1, 2002: “the project is consistent, to the maximum extent practicable, with the Commission’s amended coastal zone management program for San Francisco Bay.” A copy of the BCDC’s action is available for public review, and is incorporated herein by reference.

### **5. *CONSULTATION WITH U.S. ENVIRONMENTAL PROTECTION AGENCY***

Under NEPA and section 309 of the Clean Air Act, U.S. EPA is authorized to review and comment in writing on the environmental impact of any matter subject to NEPA and to refer to CEQ any matter determined to be unsatisfactory from the standpoint of public health, welfare, or environmental quality. The Trust consulted with EPA throughout the planning process. EPA reviewed the adequacy of the Draft EIS and rated the document as “EC-2: Environmental Concerns, Insufficient Information” requesting additional information on wetlands, traffic, and air quality. In its review of the Final EIS “EPA found that the document adequately addresses the issues we raised. Modifications to the DEIS 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 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 competing visions for Area B of the Presidio.” (U.S. EPA letter dated June 24, 2002).

## **VII. USE OF THE FINAL EIS**

The PTMP is a policy and land use framework that is intended to guide future physical changes, land use, and management decisions for Area B. Both the PTMP and the Final EIS are programmatic in nature. Recommendations and analysis are a balance of site specific and general topics, planning principles, and planning districts. The Final EIS assesses potential impacts of PTMP and other alternatives by presenting and analyzing informed and reasonable assumptions regarding a future potential mix of land uses. These assumptions do not, in all cases, represent decisions regarding what will occur, but rather uses that are likely to occur within Area B of the Presidio under each of the alternatives.

Future, more specific land use proposals and management decisions will be assessed for conformance with the PTMP, and will be evaluated to determine consistency with the analysis and conclusions in the Final EIS. In some cases, future projects may proceed directly from the Plan and Final EIS without further extensive public process or further detailed

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environmental analysis. In other cases, any future proposals with a potential for significant environmental effects that have not been previously analyzed in the PTMP Final EIS will warrant additional environmental review and further public participation. Any future analysis will be tiered from the PTMP Final EIS. The Trust will first determine the appropriate level of NEPA review, and will conduct additional analysis if required, tiering from the Final EIS. For all future projects, the Trust's NEPA Compliance Manager will determine the relevance and application of mitigation measures included in the Final EIS, consistent with the MEP described in Section V, above.

The Trust is committed to public participation during PTMP implementation. Although it is impossible to know the precise nature of public involvement that will be appropriate or required for any specific project whose scope is not currently proposed, PTMP Table 4.3 generalizes the opportunities for public involvement that will be available before important decisions are made in the future. All future actions will be carried out in accordance with NEPA and its implementing regulations.

## VIII. REPORT ACCOMPANYING THE ROD

During the "no action" period for the Final EIS (May 24 through August 23, 2002), a number of parties submitted written comments. All issues raised by comments received during the review period have been carefully considered by the Presidio Trust. The comments received raised no new issues that require modification of the proposed action. A summary of and responses to these comments are provided in Attachment 2 (Report Accompanying the ROD).

## IX. ERRATA

Minor text changes and factual corrections to the PTMP and the Final EIS are provided in Attachment 3 (Errata Sheet). Changes were either initiated by the Trust to correct or clarify statements included in the documents, or were provided at the suggestion of others, based on comments received between publication of the documents and adoption of this ROD.

## X. CONCLUSION

In accordance with the provisions of NEPA and the Trust's implementing regulations, the Trust has considered all of the information in the Final EIS and the complete record, including all public comments received. All of the above factors and considerations warrant selection of the Presidio Trust Management Plan (PTMP), identified as the Final Plan Alternative in the Final EIS, as the Trust's management plan for Area B of the Presidio of San Francisco.

The EPA published a Notice of Availability of the Final EIS in the Federal Register on May 24, 2002 (67 FR 36592). The required minimum thirty-day no action period ended on June 23, 2002. This decision will become effective immediately.

Dated: August 27, 2002

APPROVED: \_\_\_\_\_

DATE: \_\_\_\_\_

Craig Middleton  
Executive Director, The Presidio Trust