RESPONSES TO COMMENTS

FINAL ENVIRONMENTAL IMPACT STATEMENT AND PLANNING GUIDELINES

THE PRESIDIO TRUST

FOR NEW DEVELOPMENT AND USES ON 23 ACRES WITHIN

THE LETTERMAN COMPLEX

PRESIDIO OF SAN FRANCISCO

MARCH 2000

As part of the Golden Gate National Recreation Area, the Presidio's significant natural, historic, scenic, cultural and recreational resources must be managed in a manner which is consistent with sound principles of land use planning and management, and which protects the Presidio from development and uses which would destroy the scenic beauty and historic and natural character of the area and cultural and recreational resources.

Responses to Comments
Final Environmental Impact Statement and Planning Guidelines for New Development and Uses on 23 Acres within the Letterman Complex/ A Supplement to the 1994 General Management Plan Amendment Environmental Impact Statement for the Presidio

Presidio of San Francisco, San Francisco, California

This document includes all of the substantive comments received through letters and public hearings following the release of the Draft Environmental Impact Statement (EIS) and Planning Guidelines for New Development and Uses within the Letterman Complex in April 1999, and responses to the comments. This document, together with new analysis, information, and changes made in response to comments as reflected in the accompanying revised Draft EIS, will be filed as the Final EIS. The Final EIS is a supplement to the 1994 General Management Plan Amendment (GMPA) EIS, which itself analyzed the future of the Letterman Complex.

The Presidio Trust released for public review and comment the Draft EIS on April 19, 1999. Notice of the availability of the Draft EIS was provided in the Federal Register on April 27, 1999 (64 Fed. Reg. 22662-63) and local news media, and through direct mailing, flyers to owners and occupants of nearby property, posting on the Presidio Trust's website (www.presidiotrust.gov) and an update in the *Presidio Post*, the monthly publication of the Presidio Trust. The dates of public hearings were included within the notice of availability and within each copy of the Draft EIS. Approximately 325 copies of the Draft EIS were distributed to government agencies, public interest groups, and individuals. The Draft EIS was also made available for review at the Presidio Trust library, park headquarters, local libraries, the Presidio's visitor center, and on the Presidio Trust's website. Additional documents were also released to accompany the Draft EIS, including the GMPA and GMPA EIS (NPS 1994a) and the *Letterman Complex Transportation Technical Report* (Wilbur Smith Associates 1999).

The Presidio Trust announced the release and presented the Draft EIS at a formal Golden Gate National Recreation Area (GGNRA) Citizens Advisory Commission meeting on April 20, 1999, and again the following evening in a Presidio Trust public workshop. At both these meetings, the public was encouraged to submit written or oral comments on the Draft EIS through upcoming public meetings. A summary highlighting the major conclusions of the Draft EIS was widely distributed and posted on the Presidio Trust's website. Three formal GGNRA Citizens Advisory Commission meetings were held on May 18, 1999, June 15, 1999, and July 20, 1999, where public comments on the Draft EIS were received and officially transcribed. In addition, the Presidio Trust held a number of informal meetings with various government agencies and organized interest groups to provide an opportunity to ask questions. The public comment period established by the U.S. Environmental Protection Agency for the Draft EIS commenced on April 23, 1999 and was originally intended to expire on June 26, 1999. On June 18, 1999, as noticed in the Federal Register (64 Fed. Reg. 32899-32900) and through direct mailing to 735 individuals and organizations, the Presidio Trust identified a Digital Arts Center as its preferred alternative and elected to extend the public comment period and accept written comments through August 2, 1999.

By the close of the public comment period, the Presidio Trust received a total of 52 written comment letters on the Draft EIS, including an electronic form letter submitted separately by 100 individuals. The GGNRA Citizens Advisory Committee, on behalf of the Presidio Trust, also heard 40 oral testimonies by 35 individuals, 16 of whom also submitted written comment letters. In addition, 11 comment letters were submitted after the expiration of the public comment period. While the Presidio Trust is not obligated to respond to these letters, in the interest of facilitating full agency and public involvement, the Presidio Trust has chosen to evaluate the substance of these letters and respond as appropriate. All letters received prior to and after the close of the comment period and summary minutes from the three formal meetings are reprinted in this document.

The letters received by the Presidio Trust contain a variety of comments on the Draft EIS. The comments included concerns on such issues as the NEPA process; consistency with the GMPA; compliance with the Planning Guidelines; demonstration of the financial need for the project; impacts on future decision-making, the larger 60-acre complex and other areas of the park; effects on the visitor experience and public use of the Presidio; the appropriateness of the scale of development; and impacts on the adjacent neighborhood, including parking and traffic.

The Presidio Trust has responded to all substantive public comments according to the requirements of 40 CFR 1503. Some comments called for clarification of information in the Draft EIS and Planning Guidelines. Other comments required text modifications, which have been made in the Final EIS and Planning Guidelines and are identified in the Presidio Trust's responses. No responses are provided to comments that merely expressed opinions and did not identify a question or a needed text clarification, correction, or modification. Although responses are not required on comments that simply expressed support for the Presidio Trust's preferred alternative or for one of the other alternatives, all comments have been taken into account in preparing the Final EIS, and will be considered by the agency in reaching its final decision.

The letters in this document are organized by date of receipt (for ease of reference, a list of public agency and commenting organizations is provided at the end of the table of contents). Each letter has been assigned a number (letter 1, for example), with each substantive comment per letter assigned a corresponding additional number (comment 1-1, comment 1-2, and so forth). Responses immediately follow each comment letter. When an issue is addressed by another response, that response has been cross-referenced to eliminate repetition. In order to make the document more reader-friendly, a number of identical or very similar comments have been summarized in a master list which appears at the beginning of the document and a single detailed answer encompassing these comments has been prepared. The numbers in brackets that follow each master response refer to the comments that raise the issue addressed.

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[1] The National Parks and Conservation Association posted an electronic form letter on its webpage which was sent by 100 individuals. The list of individuals who submitted the letter appears immediately following the master responses (page 55). All sent letters are available for review at the Presidio Trust.

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[2] The Department of the Interior submitted a letter with identical comments to those contained in this letter submitted by the National Park Service. As the two letters are essentially identical, only one letter is reprinted here. Both letters are available for review at the Presidio Trust.

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1A The Presidio Trust's Compliance with Applicable Laws [7-1, 21-3, 23-11, 23-12, 23-14, 23-26, 23-27, 23-79, 23-84, 24-6, 27-3, 27-6, 28-1, 44-1, 44-2, 44-5, 53-5, 61-2]

Congress recognized the Presidio of San Francisco as a unique site with unique circumstances requiring unique solutions and institutional arrangements. Understanding the reasons for creation of the Presidio Trust (Trust) is important to an understanding of the Presidio and of the Trust's unique mandates. In 1972, U.S. Representative Phillip Burton authored legislation that determined that the Presidio of San Francisco (Presidio) would become part of the Golden Gate National Recreation Area (GGNRA) if the U.S. Department of Defense ever declared the base excess to its needs. In 1989, the Base Realignment and Closure Act designated the Presidio for closure. When the Army departed in 1994, jurisdiction over the Presidio transferred to the National Park Service (NPS).

For planning purposes, the NPS divided the Presidio into 13 planning areas. The General Management Plan Amendment (GMPA) prepared in 1994 by the NPS discussed each of these areas, and the environmental impact statement prepared in connection with the GMPA analyzed the environmental effects of the plan (GMPA EIS). The 1,480-acre post is unique in that it contains 780 buildings (470 of them historic), including two hospitals, barracks, offices, warehouses, a golf course, a bowling alley, a medical research center, and more than 1,100 housing units as well as a cemetery. Determining future uses of the Presidio has been a complex undertaking because of the highly varied mix of historic and non-historic buildings at the site and because of the substantial long-term finances needed to rehabilitate, preserve, and maintain the cultural and natural resources and infrastructure.

The Department of the Interior (DOI) developed early budget projections estimating the annual operating budget for the Presidio, exclusive of capital expenditures needed for infrastructure upgrades, at between $34 to $45 million per year – more than Yellowstone, Yosemite, Glacier, Great Smoky Mountains and Blue Ridge Parkway national parks combined. By comparison, the annual operating budget of $17 million for the entire 2.2 million acres of Yellowstone Park, the next most expensive national park, is less than half of the monies needed for the Presidio. Congress was unwilling to commit federal monies requested by the NPS; instead Congress showed a willingness to create an innovative public-private entity which would be charged with the long-term protection and maintenance of the Presidio.

Congress enacted Section 103 of the Omnibus Parks and Public Lands Management Act of 1996, Public Law 104-333, 110 Stat. 4097 (Trust Act), creating the Presidio Trust. The Trust is a federal government corporation established for the purpose of managing the leasing, maintenance, rehabilitation, and improvement of the non-coastal portions of the Presidio in accordance with the purposes of the GGNRA Act and the General Objectives of the GMPA. The NPS continues to manage the coastal areas. The Trust's goal is to protect a nationally significant resource by providing revenues to the park while also decreasing the cost to the taxpayer and minimizing the financial draw-down on the federal treasury.

Some commentors asserted that the Trust's process has failed to comply with the Trust Act and other applicable law. Some of the unique characteristics of the Trust's mandate bear mentioning so as to give context to the

Trust's planning and decision-making process and to offer assurances that its proposed actions conform to applicable law.

The Presidio Trust, first and foremost, is bound by the law establishing the Trust – the Trust Act. Its requirements differ significantly from those that the NPS must meet in managing property under its administrative jurisdiction, and have been necessary elements of the Trust's decision-making process as it has moved forward with this EIS. Please refer also to Sections 1.1.4 and 1.2.1 of the Final EIS for further discussion of the Trust's unique charge.

First, the Trust must manage its portion of the Presidio in such a way as to become financially self-sufficient by 2013 – that is, to generate sufficient revenue without any federal appropriation to fund the operating and long-term maintenance costs for the Presidio. If the Trust is not successful in meeting this goal by the deadline, the 1,480-acre property, most under the Trust's administrative jurisdiction, will revert to the General Services Administration for disposal (Trust Act Section 104(o)). In adopting this requirement, the House Committee on Resources, where the concept of the Trust was elaborated, noted that its "greatest concern . . . has been the cost of the Presidio. The Committee cannot support funding levels for the Presidio as proposed in the NPS plan (the GMPA)" (U.S. Congress 1995b).

Second, consistent with the year 2013 deadline, Section 104(n) of the Trust Act requires the Trust, in selecting tenants, to give primary emphasis to those that enhance the financial viability of the Presidio and facilitate the cost-effective preservation of historic buildings. In adopting this criterion, the House Committee on Resources noted that it was "concerned that strict adherence to potential tenants targeted in the Presidio general management plan would result in leases that are substantially below market value and which would seriously undermine the financial viability of the Trust. Accordingly, the Committee believes that selection of tenants which enhance the financial viability of the Presidio is the most important criteria to be used in the tenant selection process" (U.S. Congress 1995b).

Third, Section 104(c)(1-4) of the Trust Act allows the Trust to evaluate for possible demolition certain categories of buildings. In formulating this directive, the House Resources Committee observed that "a key to development of a cost-effective program would be an expanded program of building demolition. The Committee urges the Trust to carefully examine the retention of each building at the Presidio" (U.S. Congress 1995b).

The Trust must read these requirements of the Trust Act together with the Act's requirement to manage the properties under its administrative jurisdiction in accordance with the purposes set forth in Section 1 of the Golden Gate National Recreation Area Act (GGNRA Act) (see further discussion below in master response 1C and in Section 1.1.5 of the Final EIS) and in accordance with the General Objectives of the GMPA (see further discussion in master responses 2A, 3A, and 3B and in Section 1.1.5 of the Final EIS).

Given the varied nature of its statutory directives, the Trust believes it is reading them together and in a manner consistent with one another so as to comply with all laws applicable to the actions it takes.

1B The Presidio Trust's Compliance with NEPA Generally [14-2, 23-2, 24-6, 27-2, 28-1, 44-1, 44-2, 44-39, 61-2]

Certain commentors raised the general question whether the Trust has followed the NEPA mandate and regulations. NEPA directs that a federal agency examine the environmental impacts of any major action it undertakes. If the agency determines the action may have a significant impact, the agency must prepare an EIS. The EIS must discuss the environmental impacts of the proposal as well as reasonable alternatives to the proposed action and their impacts. The agency must prepare and circulate a Draft EIS to other federal and state agencies and to the public for comment for a period of not less than 45 days. The agency must then respond to these comments in preparing a Final EIS. In so doing, the agency either must incorporate suggestions or explain its reasoning for rejecting them.

The Trust believes it has followed these procedures. A Draft EIS was prepared for the proposed action of development at the Letterman Complex. Three public hearings were held under the direction of the GGNRA Citizens Advisory Commission, the Trust being authorized by law to provide opportunities for public comment through that Commission (Trust Act Section 104(c)(6)). The Trust also requested written comments from various governmental agencies, as well as from the public (see master response 1E). The Trust is taking all necessary steps to ensure that it is fully complying with the requirements of NEPA.

1C The Presidio Trust's Compliance with Other Statutes [23-11, 23-12, 23-14, 27-3, 61-2]

One commentor noted that the Letterman Digital Arts, Ltd. (LDA) proposal (Alternative 5, Digital Arts Center) is incompatible with the 1916 statute creating the National Park Service (NPS Organic Act) and with the GGNRA Act. The NPS Organic Act applies only to the NPS. With regard to the GGNRA Act, the Trust Act makes it clear that the Trust is bound only by its general purposes, which are set forth in Section 1.1.5 of the Final EIS.

The proposed Letterman Complex project is consistent with the general purposes of the GGNRA Act, which direct the utilization of the GGNRA resources "in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management." The GGNRA must be preserved "as far as possible, in its natural setting" and protected from "development and uses that would destroy the scenic beauty and natural character of the area." By focusing development into an area that has been previously intensely developed, each of the proposals preserves the park in its natural and historic setting as far as possible. The Planning Guidelines, and later Design Guidelines for new construction, will ensure that the architectural amenities and site design conform to the historic and National Historic Landmark setting and will not degrade the character of the Letterman Complex planning area or the Presidio as a whole. Further, the Great Lawn, proposed as part of the preferred alternative, increases the amount of open space from the existing site conditions. Nothing in the Trust's proposed action at the previously developed, but currently vacant, 23-acre site runs afoul of the broad purposes in the GGNRA Act.

While not directly pertinent in this document prepared under NEPA, it is worth noting that the Trust has complied with the regulations under the National Historic Preservation Act (NHPA). The NHPA requires a

federal agency to take into account the effects of its own undertaking on properties, like the Presidio, included on the National Register of Historic Places as a National Historic Landmark, to take steps to minimize harm to National Historic Landmarks that may be adversely affected, and before approval of an undertaking to give the Advisory Council on Historic Preservation (ACHP, the federal historic oversight agency) a reasonable opportunity to comment on the undertaking. The Trust has met each of these requirements. The Trust initiated Section 106 consultation under the NHPA for the Letterman Complex development concurrently with and integrated into the NEPA environmental review process. The Trust has concluded negotiations with the ACHP and with the California State Historic Preservation Office (SHPO) on a Programmatic Agreement for the Letterman Complex (see Appendix F of the Final EIS). This Programmatic Agreement sets forth a review process to ensure that new construction would be designed and sited to be compatible with the Presidio's National Historic Landmark status, to comply with the regulations that govern the NHPA, and to adhere to the site-specific planning and design guidelines that would address any adverse effects. For a more complete discussion of the relationship of this EIS to the NHPA and to the Planning and Design guidelines, please refer to Section 1.4 of the Final EIS.

1D NEPA and Tiering from the GMPA EIS [23-2, 23-19, 27-2, 27-3, 28-1, 28-3, 44-5, 44-39, 44-40, 44-58, 47-8, 61-1 through 61-4, 61-15, 65-3]

The Presidio Trust has tiered this EIS from the Presidio GMPA EIS.[3] The 1994 GMPA and EIS acknowledged the need for additional environmental analysis for future site-specific development plans, such as the proposed project, and thus set up the possibility for tiering from the GMPA EIS. The Trust made the decision to tier early in the planning process and after consultation with NPS NEPA compliance staff, which recommended the Letterman Complex project as being appropriate for application of a tiering analysis.

Tiering of environmental impact statements refers to the process of addressing a broad general program, policy, or proposal in an initial EIS, like the GMPA EIS, and analyzing a narrower site-specific proposal, related to the initial program, plan or policy in a subsequent EIS, as is being done in this Supplemental EIS. If tiering is utilized, the site-specific EIS contains a summary of the issues discussed in the first statement and incorporation by reference of discussions from the first statement. Thus, the second or site-specific statement would focus primarily upon the issues relevant to the specific proposal, and would not duplicate material found in the first EIS. It is a method encouraged by the NEPA regulations to streamline the environmental analysis process.

Some commentors maintained that tiering is inappropriate where replacement construction under the new alternatives is limited to the 23-acre site. This focus on a smaller geographic area, which differs from what was foreseen during preparation of the GMPA EIS, neither invalidates the tiering concept for those discussions in the GMPA EIS which are still relevant nor negates the environmental protections envisioned in the previous analyses. As an initial matter, nothing in NEPA requires the project to have been defined as a 60-acre project site, and the Trust had rational reasons for defining the project as replacement construction on 23 acres within

[3] The Presidio GMPA EIS can be viewed at the Presidio Trust, 34 Graham Street, San Francisco, California of at GGNRA Park Headquarters, Building 201, Fort Mason, San Francisco, California.

the Letterman Complex (see Section 1.2.2 of the Final EIS). The Trust sought to generally approximate the density that already existed at the site. The Financial Management Plan (FMP), which established the financial parameters for the project, assumed the demolition of both LAMC and LAIR because of rehabilitation and obsolescence concerns. Because the GMPA limits new construction to previously developed and developable sites, the 23 acres, being the largest of the Presidio's developed sites, was the logical location to site the new replacement construction for both LAMC and LAIR. Furthermore, replacement construction at the 23-acre site was consistent with the GMPA's concept to perpetuate development on these 23 acres, a proposed use consistent with the intensive use of the site since at least the end of the nineteenth century. Refer also to discussion in master response 6A.

Having appropriately defined the proposed project as a 23-acre project, the Trust was entitled to tier its analysis of the project from the GMPA EIS. The NEPA regulations permit "tiering" from one EIS, usually a program or generic EIS like the GMPA EIS, to site-specific EISs like this Supplemental EIS, so as to enable environmental scrutiny at different stages in the development of projects or a project without either undue speculation in the first document or repetition in the second (40 CFR Sections 1502.20, 1508.28). The existence of the NPS' GMPA and EIS provides a paradigm of tiering. The GMPA and EIS provide the overall, park-wide context. They explicitly anticipated further studies and NEPA documents to analyze impacts of future site-specific projects to support implementation. To the extent intervening developments have resulted in a modification of a site-specific project beyond what was analyzed in the GMPA EIS, as in the case with the unwillingness of a medical research user to move to the Letterman Complex, the NEPA analysis provides the occasion for analysis of points of difference between what had earlier been proposed and the current proposals, as well as analyzing the environmental impacts of each alternative. Examples of such projects undertaken since the 1994 GMPA EIS include the *Crissy Field Plan Environmental Assessment* (EA) (NPS 1996d), the new *Presidio Golf Course Facilities EA* (NPS 1996e), and the *Presidio Fire Station Improvements EA* (NPS 1997c). Not only did all three EAs tier off the GMPA EIS, but the *Presidio Fire Station Improvements EA* was known from the outset of the project to be inconsistent with the GMPA EIS because it represented a change in use from what was previously proposed in the GMPA. Similarly, the Presidio Golf Course Facilities EA examined a site-specific proposal made after a change in circumstances (i.e., relocation of the maintenance facility to a more advantageous site) following the GMPA EIS.

Thus, not only was the Trust entitled to tier from the GMPA EIS, but it has performed an adequate and comprehensive tiering analysis that meets NEPA's requirements. The Environmental Screening Form (ESF) in Appendix A is a tiering analysis that summarizes 36 impact topics discussed in the GMPA EIS. For each impact topic, the ESF identifies and summarizes specific discussions that are still relevant to the alternatives and incorporates those discussions by reference into the EIS. The ESF also identifies those discussions which no longer apply under the changed circumstances and identifies issues specific to the project that require additional environmental analysis to what has already been prepared as part of the GMPA EIS. In sum, the tiering analysis in the ESF (Appendix A) determined whether and to what extent the analysis in the prior GMPA EIS is still sufficient for the proposed project. Prior to preparation of the Draft EIS, the Presidio Trust solicited 37 public agencies and 8 Indian Tribes to comment on the ESF, and 9 agencies responded. The Presidio Trust took into consideration the comments received on significant environmental issues and revised the ESF, the results of which appear in Appendix A. Commenting agencies included the California Department of Health

Services (1999), California Department of Water Resources (1999), California Department of Toxic Substances Control (1999), City and County of San Francisco, Department of Public Works (1999c) and Department of Parking and Traffic (1999e); National Park Service (1999e), U.S. Army, BRAC Environmental Office (1999); and U.S. Army Corps of Engineers, San Francisco District (1999). A summary of the significant environmental issues raised is provided in Section 5.3, Public Agency Consultation of the EIS.

Based on the results of the ESF analysis and consultation and coordination efforts (as further discussed in Section 5 of the EIS), the Presidio Trust has determined that the issues listed in Section 1.5 of the Final EIS required additional analysis under NEPA. The differences between the characteristics of the new alternatives not previously analyzed in the GMPA EIS and the GMPA's proposed action have been clearly identified in Table 1, Summary of Alternatives and described in detail in Section 2, Alternatives of the Final EIS.

Some commentors asserted that tiering is inappropriate because the Trust has not considered the effects of a project within the 60-acre Letterman Complex. To ensure an adequate analysis of the environmental impacts of implementing the project within the larger 60-acre complex, however, the Trust defined as Alternative 1 and analyzed in this EIS the GMPA's concept of a Science and Education Center to serve as a benchmark for comparison against the other alternatives that focused change within the 23 acres.

In discussing tiering, it is important to keep in mind that the NPS and the Trust have different sets of procedures. The NPS process typically includes scoping, drafting an EIS on scoped alternatives, selecting a preferred alternative, and issuing a request for proposals (RFP) based upon the preferred alternative. This process is compatible with, but not required by NEPA. The Trust, in contrast, first issued a request for qualifications (RFQ) for the proposed project and held public forums to obtain input on the scope of the alternatives and the specific impacts to be evaluated. Project proponents then responded to the RFQ, rendering conceptual alternatives, which are based upon real-world possibilities. Within the confines of the Trust Act and the GMPA, the Trust casts a wide net to open up the selection process to what the public and the market are willing to offer and build. This allows the Trust to meet the financial element of its purpose while at the same time identifying a full range of alternatives for analysis in accord with NEPA's requirements. See master response 6A in this document, and Sections 1.2 and 2.1 of the Final EIS for further discussion.

1E Adequacy of Public Involvement Opportunities [7-1, 21-4, 23-1, 23-57, 23-58, 23-60, 24-6, 27-1, 27-10, 28-2, 28-6, 44-1]

Several commentors asserted that the Trust failed to provide meaningful public involvement. In fact, the Trust designed the public involvement process to ensure that there were full public notice and hearing opportunities. The Trust, both on its own and through the GGNRA Citizens Advisory Commission, has held fifteen public meetings and workshops in connection with the Letterman Complex. These include two workshops that were held to solicit the public's input regarding appropriate uses for the Letterman Complex prior to the Trust's receipt of any proposals for the site. The Trust also held a public board meeting and hosted two workshops at which the four short-listed respondents from the RFP presented their detailed proposals. In anticipation of the preparation of the Draft EIS, the Trust held a public meeting to elicit comment regarding the scoping of environmental issues requiring further analysis. Upon its release, the Trust presented the Draft EIS to the

GGNRA Citizens Advisory Commission and held a public meeting to present an overview of the document. The Trust subsequently held a number of public hearings to receive public comment on the Draft EIS. After its announcement of a preferred alternative, the Trust extended the public comment period for an additional 45 days. Nearly 1,500 people have provided input, thus far, in public meetings sponsored by the Trust related to the proposed project, and the Trust has received more than 300 letters regarding reuse of the Letterman Complex. In addition to the Letterman Complex public meetings and workshops that the Trust has hosted, the Trust has made presentations at meetings independently sponsored by various neighborhood and community groups, including San Francisco Planning and Urban Research Association (SPUR) and Neighborhood Associations for Presidio Planning (NAPP). For a more complete discussion of the Trust's public outreach efforts associated with the proposed project, please refer to Section 5.1 of the Final EIS (History of Public Involvement).

1F Preference for NPS Process [23-27, 28-2, 44-6]

Some commentors who have expressed dissatisfaction with the Trust's public involvement process suggested that the Trust's use of the NPS planning process would be more effective and acceptable. Neither NEPA nor the Presidio Trust Act require the Trust to implement its projects by replicating the process of a particular other agency (see master response 1D above). To the extent the Trust contemplates implementing proposals whose impacts have not been previously and adequately analyzed in the EIS for the GMPA, the Trust will undertake further environmental review consistent with the requirements of NEPA, the NHPA, and other relevant environmental review laws and executive orders. The Trust's adoption of a streamlined process is necessitated by the need to make progress toward the Trust's mandate of financial self-sufficiency, a requirement to which NPS is not subject.

Furthermore, the Trust Act specifically contemplates that the Trust would have its own planning process. In light of the differences between the NPS and Trust mandates, staffing, and policies, the Trust's planning process cannot be and is not the same as the NPS process. The Trust is not required to use the NPS' planning procedures in order to implement its proposals. In fact, the Trust must endeavor to minimize time-consuming procedures that would jeopardize its ability to meet the 2013 deadline for self-sufficiency while meeting its mandate under NEPA. In sum, the Trust's legal mandates differ from those of the NPS, and the Trust is obligated to implement Congress's directives under the Trust Act.

2A Conformity of Trust's Decisions with the GMPA [10-4, 13-16, 14-11, 14-18, 18-1, 18-3, 18-8 through 18-10, 19-1, 21-3, 23-8, 23-11 through 23-14, 23-21 through 23-24, 23-36, 23-50, 27-3, 27-4, 28-3, 33-2, 44-1, 44-2, 44-7, 44-9, 44-10, 44-12, 44-43, 47-2, 53-5, 55-1, 61-1, 65-2]

Most commentors noted the importance of the GMPA as the foundational planning document for the Presidio. Some of these same commentors criticized the Trust, alleging it failed to select a development alternative that conforms to the plans and provisions of the GMPA. Although the General Objectives of that document, not its specific plans, are the guideposts required by law for future development, the Trust has announced that it will

go well beyond these minimum requirements of law and use the GMPA as the foundation for its planning decisions. It is the master document which guides the Trust in decision-making, despite changed conditions or additional needs that, at times, may require the Trust to reassess the implementation of certain of the GMPA's site-specific plans or programs.

The Trust Act, passed in 1996 after Congress and the President agreed on the legislation creating the Presidio Trust, directs the Trust to fulfill the purposes outlined in Section 1 of the 1972 legislation creating the GGNRA and to follow the General Objectives of the GMPA (see master response 3A and Section 1.4.1 of the EIS). Therefore, as a matter of law, the Presidio Trust follows the General Objectives of the GMPA. As a matter of policy, the Trust uses the GMPA as its principal guide for all Presidio planning activities.

In 1994, the NPS adopted the GMPA and Final EIS to guide planning for the Presidio. The GMPA is contained in the 150-page document entitled *Creating a Park for the 21st Century: From Military Post to National Park, Final General Management Plan Amendment, Presidio of San Francisco, Golden Gate National Recreation Area, California*, dated July 1994, and prepared by the NPS. Initial drafts of legislation that eventually became the Trust Act required the Trust to manage the Presidio in accordance with the GMPA (see U.S. Congress 1993, 1995a). The term "general objectives" was added, however, in recognition of both the Trust's need for flexibility in light of changing circumstances and the need to meet the 2013 deadline for self-sufficiency. In this regard, the House Resources Committee noted: "The Committee finds that the cost of the plan for the Presidio as completed by the NPS is unrealistic. While the Committee does endorse the "general objectives" of the [GMPA], the Committee recognizes that development of a reasonable program is essential to ensure the success of the Presidio Trust and the long-term preservation of the historical and other resources of the Presidio" (U.S. Congress 1995a).

Congress, therefore, explicitly did not accept all of the particulars of the GMPA because of conflicts with the economic requirements and the changing user environment already evident in 1996 when the Trust Act was enacted. Congress intended that its directive to follow the "general objectives" of the GMPA "be interpreted to mean such things as the general relationship between developed and undeveloped lands, continued opportunities for public access and protection of the most important historic features as expressed in the Plan, not to mean any specific elements of the Plan" (Hansen 1999).

The outcome of the Trust's process has in fact met the General Objectives of the GMPA (see master response 3). A Digital Arts Center (DAC), as the preferred alternative, offers an appropriate use involving many of the key planning objectives of the GMPA including "sustainability, . . . the arts, education, research, . . . innovation and/or communication." The DAC proponent offers research and development with its work in digital imagery in film arts and technology that has also been applied to other fields like medical research and diagnosis. The DAC proponent provides educational programming for schools, professionals, and others. Visitor experience would be enhanced through onsite contributions of services to create programs that interpret Presidio history and tell its sustainability story. The DAC would also enhance community services by supporting volunteerism, community outreach, and mentoring programs. The DAC, even more than the University of California at San Francisco (UCSF) proposal to NPS, enhances the scenic and cultural resources of the Presidio by removing LAMC and LAIR, modern structures that are architecturally non-distinctive and visually intrusive, and preserving, enhancing and restoring scenic vistas, including views to the Palace of Fine Arts. The 7-acre Great

Lawn or public park would further the GMPA's General Objective to increase open space. Furthermore, the project would "consolidate the developed space" of the entire Letterman Complex, and the ground rents would be integral to the capacity to "sustain the Presidio indefinitely as a great national park in an urban area" (see Section 1.1.5, Consistency with Presidio Goals of the EIS).

To the extent that commentors perceive that the Trust has departed from the GMPA, it is only with respect to the site-specific plan set forth in the GMPA, which the Trust could not pursue because certain assumptions of the GMPA about the future of the Presidio have changed with time. Specifically, although not named expressly in the GMPA, there was an untested expectation that UCSF would locate its research and medical facilities at LAMC/LAIR as an anchor tenant. The GMPA was crafted with the idea that UCSF would lease LAIR, demolish LAMC if necessary, and then replace the LAMC square footage with approximately 450,000 square feet of new laboratories. Congress even passed legislation allowing NPS leasing and revenue retention authority specifically for the Letterman Complex to allow NPS to solicit specific medical research users for the complex. Although negotiations were opened, no agreement was reached, and UCSF subsequently decided to locate its facility at Mission Bay rather than the Presidio. Although NPS did open negotiations with other parties, specifically the City of San Francisco Department of Public Health, no agreement could be finalized for a medical research user. Since that time, no other suitable tenant has been identified for the existing facility that would adhere to the GMPA's site-specific plan while also allowing the Trust to accomplish its clear directives (see master response 6A and Section 1.1.7 of the Final EIS for further discussion).

Certain commentors believe that the Letterman Complex proposals must be validated against other vision statements in the GMPA, which they characterize as its true "general objectives." Most frequently, commentors cited the descriptive statement of the Presidio as a "global center dedicated to addressing the world's most critical environmental, social, and cultural challenges." In the commentors' view, "If an action does not contribute to the fulfillment of the vision, it must be viewed with skepticism and trigger further work to define an outcome more in keeping with the plan" (see comment 44-7). This statement, however, while made in the GMPA, is not part of the General Objectives, and the Trust's mandate is to follow only the General Objectives (see master response 3 and Section 1.1.5 of the Final EIS for discussion of the General Objectives of the GMPA).

Some commentors criticized a Digital Arts Center as fundamentally inconsistent with the development envisioned in the GMPA, which as noted above anticipated an anchor tenant in the field of science and research like UCSF. In fact, the preferred alternative is similar in many ways to the GMPA concept for the site as noted in Section 4.5.1, Consistency with Approved Plans and Policies in the EIS. A Digital Arts Center would foster the GMPA's proposed major directions for the future of the Presidio by perpetuating the site as a building and activity core, and retaining and using the site for research, innovation in the digital arts, and educational purposes by a single tenant. Although the public would be unable to access many of a DAC's building interiors, that would have been the case with a Scientific and Education Center as well. Both developments would contain significant scientific and educational components (see letter 43 from the San Francisco Unified School District). Further, a DAC enhances the park-like setting over and above the previously contemplated medical research facility by adding some 15 acres of open space in an area designated for parking in the GMPA. In addition, while some comments note that a DAC does not envision housing on the 23 acres, no housing was contemplated on the same 23 acres in the GMPA.

Further, commentors asserted that a DAC is, of the possible alternatives, the "least devoted to finding solutions to global concerns" and is a "radical departure from a Science and Education Center" contemplated by the GMPA. These comments appear to assume that the GMPA contemplated a use on the 23 acres specifically focused upon finding solutions to global concerns. Health sciences are clearly concerns shared around the globe, but the mission of the scientific research and education complex, as contemplated in the GMPA, would not have been directly focused upon environmental sustainability or worldwide cooperation. Groups with those focuses were, in the GMPA, to be located on other portions of the Presidio. That is still the case.

Some commentors suggested that the Trust offered no explanation for departing from the GMPA. On the contrary, the Trust evaluated the usefulness of the GMPA in the context of the Trust's unique mandates and any changed circumstances since the GMPA was finalized. The GMPA was written long before anyone knew what form the new management entity (now the Trust) would take. It was written before anyone predicted that Congress would require that entity to be financially self-sufficient, and before it was known that the marketability of a research and education facility was not viable at the Letterman Complex. Indeed, other factors have arisen since the development of the GMPA that were considered by the Trust in deciding whether the specific statements in the GMPA can be used as an effective guide to the outcome of the Letterman Complex planning process. Even if viewed as a guideline for the proposed project, it need not be applied rigidly to every planning site and decision, so long as on balance the whole of the Presidio meets this goal and the General Objectives.

In fact, the alternatives analyzed do not represent so substantial a departure from the GMPA as is characterized by several commentors. The 900,000 square feet of development does not represent new construction over and above existing building space but rather replacement construction that roughly reflects the existing development footprint of LAMC and LAIR. Similarly, the proposed use as a Digital Arts Center involves the continued occupancy of over 800,000 square feet of building space by a single large institutional user. This could have been the result had NPS concluded a lease with UCSF in 1994 under its Letterman Complex RFQ. Thus, either under an early attempt to implement the GMPA or under the current proposal to implement the GMPA, between 800,000 and 900,000 square feet would be occupied by a single large institutional user.

Some commentors criticized the EIS alternatives, alleging that the Trust has based its decisions solely on its financial self-sufficiency mandate. The planning decisions for the Letterman Complex have been based upon a myriad of factors. Key among them has been the Trust's consideration of the financial contribution that the proposed project can make to the Trust Act's financial self-sufficiency mandate. Indeed, among the first official acts required of the Trust was to present to Congress the Financial Management Program showing how the Trust planned to meet its self-sufficiency requirement. Under the FMP, lease revenues account for $35.6 million of the $36.6 million needed annually to support the Presidio long-term, and the Letterman Complex lease is the single largest component (by 2.5 times) of the revenue needed. The 23-acre site lease accounts for one-third of non-residential lease revenues needed and 14 percent of total lease revenue (see Section 1.2.2 of the Final EIS and master response 10 for a more complete discussion of the FMP and the financial contribution of the project).

In consideration of these revenue needs and other factors in the Trust Act – that tenants that enhance the financial viability of the Presidio shall be given priority (see Trust Act Section 104(n) – it was fair to make

consideration of financial factors an important element of the planning and decision-making process. It cannot be fairly said, however, that decision making for the proposed project departed from the specifics of the GMPA solely because of the financial mandates on the Trust. The Trust has, in this instance, departed from the specifics of the GMPA because through the RFQ process, the specific type of tenant contemplated in the GMPA did not come forth to undertake the development. Given that reality, the Trust was obligated to identify another similar use for the parcel which would be consistent with the General Objectives of the GMPA and also facilitate the Trust's efforts to meet its statutory goal of self-sufficiency. A Digital Arts Center meets those objective needs.

2B Amending the GMPA [7-1, 18-9, 21-3, 23-8, 23-36, 44-12, 55-2, 65-4]

Some commentors believe that the alternatives for the 23-acre site vary so substantially from the GMPA that the Trust should have amended the GMPA before proceeding with a development proposal for the Letterman Complex. Because the action being proposed is generally consistent with the GMPA, and because the Trust will continue to use the GMPA as the foundation for its planning decisions, there is no need to amend it. To the extent the proposed actions deviate from those in the GMPA and accompanying EIS, the Trust has identified those inconsistencies and is undertaking further environmental review consistent with the requirements of NEPA and the NHPA to supplement the GMPA EIS.

Under Section 104(c) of the Trust Act, Congress designated the Trust as a successor in interest to NPS for purposes of NEPA. The effect of this provision is to afford the Trust the benefit of the environmental analysis previously undertaken by NPS in support of the GMPA. NEPA requires only that the Trust analyze environmental impacts that were not previously or adequately analyzed in the GMPA EIS. The Trust is fulfilling this requirement by undertaking this EIS to supplement the GMPA EIS. This process allows efficient consideration of changed circumstances and offers the public opportunity for further review and comment on the differences without need of a full programmatic EIS each time there is need for a site-specific change in the plan (see master response 1D for further discussion). Neither NEPA nor the Trust Act require that the Trust formally amend the GMPA or adhere to the same planning process as that of the NPS to implement proposals that differ in certain respects from those in the GMPA.

3A General Objectives Identified and Adopted by the Trust [14-11, 23-13, 23-21, 23-32 through 23-35, 27-4, 27-5, 44-2, 44-5, 44-8 through 44-10, 44-58, 47-3, 49-2, 61-7]

Several commentors claimed that the General Objectives of the GMPA adopted by Trust Board Resolution No. 99-11 are not truly those of the GMPA. They assert the Trust identified General Objectives that fail to match either the GMPA's letter or spirit, that omit important additional objectives of the GMPA, and that are self-serving in their bias toward flexible land use decision-making. The term "general objectives" of the GMPA as enacted as part of the Trust Act was not precisely identified either by Congress or within the text of the GMPA. It therefore fell to the Trust to interpret the provisions of its authorizing statute, for the administration of which it is responsible. The Trust engaged in a thoughtful process that ensured the identification of a comprehensive

set of objectives that were not only true to the spirit of the GMPA but also consistent with congressional guidance for the management of the Presidio. In order to provide guidance to the Trust staff in their day-to-day work, the Trust's Board and management initiated an internal process to develop a statement of principles that incorporates both the purposes of the GGNRA Act and embodies the General Objectives of the GMPA. In that process, Trust Board members, staff, and attorneys reviewed the GMPA. Several of these reviewers were participants in the planning process that led to the NPS' adoption of the GMPA and in the legislative process that led to Congress' enactment of the Trust Act. The outcome of that process was the Presidio Trust Board GMPA General Objectives Resolution No. 99-11.

The General Objectives, as identified by the Trust, are similar to an earlier statement of Presidio-wide goals prepared by NPS. In 1994, when NPS was itself attempting to lease the Letterman Complex facilities and when the GMPA had been prepared and was undergoing circulation in its draft form, the NPS issued its own RFQ for the Letterman Complex. In that document, the NPS stated that programs and activities should support park-wide goals to the fullest extent possible. "These park-wide goals," said the NPS, "are summarized below, and are more fully described in the Draft General Management Plan Amendment:

- Promote environmental stewardship and sustainability.
- Encourage cross-cultural and international cooperation.
- Provide community service and restoration.
- Promote health and scientific discovery (NPS 1994c).

Each of the NPS "park-wide goals" for the Presidio has been adopted, almost verbatim, as part of the General Objectives of the GMPA adopted by the Trust in Resolution 99-11, as have other objectives gleaned from the GMPA as a whole.

The Trust not only looked to such similar statements by also solicited comments from NPS on the resolution prior to its adoption. The NPS comments suggested an approach choosing specific sentences and phrases from various portions of the 150-page document to exemplify its objectives while incorporating by reference the GMPA's site-specific programmatic goals. This approach differed somewhat from the earlier NPS RFQ statement and from that of the Trust, which had attempted to distill the General Objectives in such a way as to give meaning to the term as used in the Trust Act.

The Trust, rather than looking only to the GMPA itself, looked also to the Trust Act and its legislative history. The assumption of the GMPA was the need for an ongoing federal appropriation of at least $13 million annually for Presidio operations. The legislation as originally introduced did not include the requirement that the Trust be considered financially self-sufficient by a certain time. Once the legislation incorporated the restriction on federal appropriations and a specific time constraint for achieving self-sufficiency, it became clear that the Trust would need additional flexibility to reach the goal of a self-sustaining entity. Although early drafts of the Trust legislation required the Trust to manage the Presidio in accordance with the GMPA, the term "general objectives of the GMPA" was added in recognition of the need for implementation flexibility in light of changing circumstances and the need to meet the 2013 deadline for self-sufficiency. In view of this congressional guidance, the Trust was ultimately not able to reconcile the overall NPS approach to

identification of general objectives with what could appropriately be considered as the General Objectives of the GMPA as a whole, consistent with congressional guidance. Because of the differing approach, only certain NPS comments were incorporated into the final resolution, which was adopted by the Trust on March 4, 1999.

In addition to objecting to the substance of the General Objectives identified by the Trust, certain commentors assert that the Trust had no legal mandate to identify the General Objectives. Construction of a statute by the executive agency charged with implementing its provisions is a basic maxim of administrative law. Here, the Trust Act used a term, "general objectives of the GMPA," which was not precisely defined. Courts routinely recognize the authority of executive agencies, such as the Trust, to interpret their authorizing statutes, so long as such statutes are open to interpretation. Where neither Congress nor the text of the GMPA precisely identified the General Objectives, the Trust was within its statutory authority to give a reasonable, and more precise, meaning to the language of its authorizing statute.

Commentors also asserted that the identification of General Objectives is self-serving in its bias toward flexible decision-making. Rather than being self-serving, the General Objectives take into account the legislative intent not to unduly restrict the efforts of the Trust to achieve its goals under the mandate imposed by Congress. Without the permanent and considerable federal appropriations projected by NPS for operation of the Presidio under the GMPA, it would have been unrealistic to have identified the General Objectives to include the constraints of a plan whose specifics relied upon a financial premise ultimately rejected by the Congress. The Trust was therefore acting within its authority and in accord with its legal mandate.

The concern of some commentors that the General Objectives reorient the Presidio under an alternate and impermissible vision from that of the GMPA is misplaced. These commentors are concerned that adherence to the General Objectives would preclude the Presidio from becoming a center dedicated to addressing the world's most important environmental, social, and cultural challenges or a model of environmental sustainability. On the contrary, the GMPA remains the guiding document for the Trust and expresses the general will of the community and park planners for the future of the Presidio. Some commentors suggest that a private, profit-making entity dedicated to the development and production of digital arts and technology cannot meet these goals. This comment appears to assume that the GMPA contemplated a planned use focused upon a non-profit user engaged in a global environmental, social, or cultural challenge. A scientific research and education complex, as contemplated in the GMPA, would not have closely fit the commentors' vision, but was nevertheless acceptable when the Presidio is considered as a whole. Groups with these global focuses were, in the GMPA, to be located on other portions of the Presidio. That is still the case, as evidenced by the presence of the Thoreau Center Partners and other non-profit organizations and tenants in the remaining portion of the Letterman Complex, as well as in other Presidio buildings and facilities.

One commentor asserted that the General Objectives identified by the Trust do not recognize the historical significance of the Presidio because of the modifier "as appropriate." The General Objectives of the GMPA include the preservation and (where appropriate) enhancement of the cultural, natural, recreational, and scenic resources of the Presidio. Foremost among the cultural resources of the Presidio are the various facets of the park's more than two hundred years of history. Thus, the historical resources are a central focus of the objectives of the GMPA, and their existence is a prime motivator of the Trust Act. Contrary to the concerns expressed about this language, the clause "where appropriate" modifies "enhancement" of these resources, not

"preservation." Preservation of the resources of the Presidio is a central objective of the GMPA and an obligation under the NHPA, and is thus always appropriate. Use of this modifying clause "where appropriate" in connection with enhancement of resources is intended to indicate sensitivity to the complications inherent in "enhancing" or "improving" any resource, and the caution which would be exercised prior to any alteration of the facilities of the Presidio.

3B Consistency of Trust's Proposed Actions with the General Objectives of the GMPA [14-11, 18-1, 23-13, 23-21, 23-33, 27-4, 27-5, 44-2, 44-5, 44-8 through 44-10, 44-43, 47-3]

Several commentors claimed that the actions proposed by the Trust are inconsistent with the General Objectives of the GMPA. The EIS specifically analyzes the consistency of each alternative with the GMPA General Objectives. For the preferred alternative, a Digital Arts Center, the analysis is set forth in Section 4.5.1.1. As noted there, a DAC is consistent with the General Objectives of the GMPA, which are identified in Section 1.1.5 of the EIS. Furthermore, although the preferred alternative would not implement all the particulars of the site-specific proposal of the GMPA, as set forth in Section 4.5.1.2, the preferred alternative is also consistent with a number of the more specific goals and planning principles of the GMPA (please see the discussion in Section 4.5.1.2 for a full response to these comments).

3C Process to Identify the General Objectives [23-32, 23-34, 27-4, 27-5, 44-2, 44-5, 44-8, 44-9, 47-3, 49-2]

A number of commentors believe that the Trust has engaged in an improper process for identifying the General Objectives of the GMPA. Some commentors believe that the Trust's identification of the General Objectives required an amendment to the GMPA and independent NEPA review. The commentors' assertion wrongly presumes that the Trust's adoption of the General Objectives has abandoned or changed the GMPA. On the contrary, the Trust Board resolution acknowledges the importance of the GMPA to the Trust's planning process and implements a clear and overriding policy directive that Trust staff be guided by the GMPA's General Objectives in managing the property under the Trust's jurisdiction. The Trust continues to use the GMPA as the foundation for planning decisions. It is the master document that guides the Trust in decision-making, and is the current comprehensive plan for the Presidio, despite the fact that changed conditions may require the Trust to reassess certain site-specific plans and programs in the GMPA, occasioning NEPA review.

Other commentors claimed that the General Objectives could not be properly identified or adopted by the Trust without an opportunity for public review and comment. There is no requirement under the law to have provided the public with the opportunity for notice and comment or advance publication prior to the Trust's adoption of Resolution 99-11 (see 5 U.S.C. Section 553(b) and (d)). Nevertheless, the Trust welcomes comment on Resolution 99-11, as it welcomes comment on all its resolutions and activities. Furthermore, the Trust intends to continue to solicit comments on its identification of the GMPA's General Objectives, on its general planning process, and on specific proposed actions of the Trust.

A few commentors suggested that the Trust Act itself required that the Board Resolution identifying the General Objectives be subject to public review and comment. Section 103(c)(6) of the Trust Act requires the Trust Board to establish "procedures for providing public information and opportunities for public comment regarding policy, planning, and design issues." Pursuant to this provision, the Board established the Trust's Public Outreach Policy, which encourages members of the general public to make their views known to the Trust (refer to Section 5.1.1 of the Final EIS for further discussion). The public is free to provide comment on the resolution in writing, by phone, or at a variety of public meetings pursuant to the policy. However, while the policy encourages public input in a variety of ways, it imposes no requirement on the Trust to have made the resolution subject to formal notice and comment.

4A Need for a Comprehensive Planning Document [10-1, 14-3, 14-11, 15-3, 44-2, 44-4, 44-5, 44-9, 44-11, 44-12, 44-39, 44-40, 44-43, 49-3, 61-1, 61-2, 62-3, 65-5, 65-6]

Some commentors raised questions about a master plan for the portion of the Presidio under Trust jurisdiction. Such a comprehensive plan for the Presidio already exists in the GMPA. The GMPA comprehensively addresses a plan for the 13 major planning areas at the Presidio and other resource management plans, including natural areas, visitor services, transportation, and sustainability. The Trust is required by statute to follow the General Objectives of the GMPA, and the Trust has announced as a matter of policy that it would go beyond the statutory command and follow the GMPA unless there is a specific change of circumstance or other need that warrants not doing so.

By way of example, specific to this EIS, the need for certain site-specific modifications was necessitated at the point that UCSF and other medical research users withdrew as potential tenants, making the project envisioned by the GMPA at the Letterman Complex infeasible. Given the infeasibility of the UCSF option, the Trust sought in its RFQ and subsequent actions to solicit proposals comparable in size, stature, and location to UCSF's while simultaneously fulfilling the Trust Act's mandate for financial self-sufficiency.

The Trust preliminarily concluded that the preferred alternative, a Digital Arts Center, is fundamentally consistent with and fairly approximates the development envisioned in the GMPA, which anticipated that a scientific research and education facility would occupy LAMC/LAIR as an anchor tenant. The developments are equivalent in many ways, including the public access aspects, the research and education components, the extent of open space (with a DAC actually increasing unpaved open space), and the absence of a housing component. These similarities are more fully discussed in master response 2A.

For those commentors who would rather have seen the development expanded to include consideration of the entire 60 acres within the Letterman Complex rather than the 23-acre site, it is consistent with NEPA to have focused the scope of the proposed project on the 23 acres (see further discussion in master response 6A). Furthermore, this Final EIS has thoroughly studied the effects of focusing development within 23 acres. For the purposes of comparing the magnitude of impacts of Alternatives 2 through 5, which would limit development to the 23 acres, the Science and Education Center (Alternative 1 in the EIS) contemplates and approximates an intensity of development on the 60 acres as is envisioned in the GMPA. Alternative 1 thus provides an

important baseline to show the effects of spreading the density across the complex as compared to retaining the entire development within the 23-acre site. It must be borne in mind that the 23-acre Digital Art Center approximates the density of development and the footprint of the existing LAMC and LAIR. Section 4.1 of the EIS includes an analysis of the impacts of either leaving LAIR and LAMC intact or of replacing LAMC with an equal square footage and keeping LAIR (please refer also to Section 1.2.2 of the EIS and master responses 1D, 2A, and 6A for further discussion of the 23-acre site).

Replacement construction on the 23-acre site as proposed in Alternatives 2 through 5 would foreclose the opportunity for the construction of new infill buildings within the adjacent historic hospital complex as was called for in the GMPA. The implications of this are that if the 900,000-square-foot development on the 23 acres in this proposal is completed, future projects in the Letterman Complex, such as rehabilitating existing buildings not identified for demolition, would be limited to no more than 400,000 square feet total so as not to exceed the 1.3-million-square-foot cap studied under the GMPA.

More generally, it is important to view the GMPA in context. The NPS proposed detailed implementation of that plan and requested long-term annual funding of $13 to $15 million from Congress to do so. Congress refused, and instead created the Presidio Trust, giving it a mandate to achieve financial self-sufficiency within 15 years. The stark reality of the congressional command is one of the guides for the Trust. That, in turn, has led the Trust to the awareness that a continued focus on the generation of plans cannot be permitted to preclude taking the actual steps which would lead to financial self-sufficiency. Therefore, in the real world of a congressionally determined 15-year deadline before the Presidio is transferred to the General Services Administration (GSA) to be sold to the highest bidder and ceases to be a national park, using the GMPA as the Trust's basic guidance and moving to actual actions to achieve the congressional purpose makes sense. The GMPA is the Trust's comprehensive planning document. To the extent intervening events have upset certain site-specific assumptions of the GMPA, as was the case with the Letterman Complex, a site-specific NEPA analysis will discuss the departures from the GMPA and analyze their environmental impacts. Otherwise the GMPA guides the Trust. NEPA does not require anything other than that.

Some commentors asserted the need to prepare a new comprehensive planning document, specifically the comprehensive management program (CMP) referred to in the Trust Act, in order to provide a planning context before moving ahead with the proposed project. The CMP contemplated under the Trust Act (Section 104(c)) is of a potentially more limited scope than envisioned by commentors. The Trust Act calls for the Trust to develop a program consisting of options to carry out routine administrative and facility management programs and re-evaluation of rehabilitation, demolition, and replacement construction for certain existing structures. By contrast, the GMPA provides the Presidio-wide planning assumptions that the commentors seek to fulfill through a new comprehensive plan or the CMP. Under the GMPA, the Letterman Complex has been considered and analyzed among all of the proposed developments within the Presidio, and through this Supplemental EIS the effects of any changes to the plan as contemplated in the GMPA have been analyzed.

Given the Trust's reliance on the GMPA as the foundational planning document for purposes of NEPA, NEPA does not require development of a new comprehensive plan for this Supplemental EIS. Nevertheless, both NPS and the public have expressed desire for the Trust to better explain how it intends to implement the GMPA Presidio-wide in view of the need under some circumstances to depart from the site-specific proposals of the

GMPA. The Trust believes that the best means to understand the Trust's approach to GMPA implementation is to undertake certain additional comprehensive planning that tiers off the GMPA. In proposing this undertaking, the Trust acknowledges and wishes to respond to the strong sentiment of NPS as a cooperating agency and the public generally to clarify the Trust's Presidio-wide approach to circumstances that have changed since finalizing the GMPA and to the specific comprehensive program elements of Section 104(c) of the Trust Act. The Trust has made no decisions on the scope of such comprehensive planning, but anticipates future public sessions to involve the interested community in helping to define both its scope and content.

4B Adequacy of Cumulative Effects Analysis [10-1, 14-2, 14-3, 32-6, 44-39, 44-55, 46-1, 46-11, 47-8, 49-3, 49-4, 55-3, 61-2, 61-18, 61-19, 61-32]

Several reviewers felt that the Final EIS should better assess cumulative impacts, and that the Presidio Trust should document that effort. In response to the comments, revised sections on cumulative impacts are now disclosed in Sections 4.1.11. through 4.6.11 for each alternative in Section 4. The future actions that were included in the cumulative effects analysis are listed in Table 9 and shown in Figure 14 in the Final EIS. These actions, which include activities occurring outside of the Presidio Trust's jurisdiction, were chosen based on their proximity to the Letterman Complex, their potential influence on the same resources affected by new development and uses within the 23-acre site (i.e., whether the effects of these actions would be similar to those of the project), and the likelihood of their occurrence.[4] The actions were identified based on consulting with all agencies within a project impact zone (defined for the analysis as the entire Presidio and surrounding neighborhoods) and investigating their actions in the planning, budgeting, or execution phase. The plans included nine originated by the Presidio Trust (including all proposals/development plans in the Request for Qualifications or Request for Proposal stages), three from the City and County of San Francisco, two from the National Park Service, one from the Golden Gate Bridge, Highway and Transportation District, and one from the San Francisco County Transportation Authority.[5] Additional information on the listed actions is also provided in Appendix G of the Final EIS.

While the guidance on cumulative effects analysis in the Council on Environmental Quality (CEQ) handbook (1997) emphasizes the effects of projects on ecological resources, these resources would not be affected by the project.[6] Therefore, the analysis focused on other resources and areas that may be significantly affected, including solid waste, water supply and distribution, schools, housing, traffic and transportation systems, cultural resources (including visitor experience and visual resources), air quality, and noise. The level of analysis and scope of cumulative impact assessment within each of these resource areas in the Final EIS is commensurate with the potential impacts, i.e., a greater degree of detail is provided for more potentially serious impacts. Cumulative effects were also compared to appropriate national, state, regional, or community goals to

[4] The CEQ handbook (1997) concerning cumulative effects analysis under NEPA recommends that such analysis should "count what counts," not provide superficial analysis of a "long laundry list" of issues that have little relevance to the effects of the proposed action or the decision (page 12). The handbook recommends analysts to identify and characterize the effects of other actions on the *same* resources that may be directly or indirectly affected by the proposed project (page 23). (emphasis added)

[5] It should be noted that none of the agencies consulted have developed planning documents that identify proposed future actions in the project impact zone to facilitate the cumulative effects analysis, and therefore the Trust relied on other sources of available information to predict which future actions might reasonably be expected.

[6] As documented in Sections D, Water Quality; O, Wetlands and Stream Drainages; P, Native Plant Communities; Q, Wildlife; and R, Special Status Species in Appendix A of the Final EIS.

determine whether the total effect would be significant. The analysis in the Final EIS determined that cumulative impacts would not be significant and that the resources of concern would not be degraded to unacceptable levels.

Three further types of potential cumulative impacts merit specific mention. First, the cumulative impacts of implementing storm water pollution prevention plans (SWPPPs) at construction projects throughout the Presidio are not discussed in further detail, as suggested by several of the commentors, because these impacts have been previously analyzed in the GMPA EIS (as discussed and incorporated by reference on page A-20 of the Draft EIS) and would not be significant. Furthermore, since the SWPPPs are performance-based to the extent that they would prohibit the discharge of storm water that would cause or threaten pollution, contamination, or nuisance, and they would allow the Presidio Trust to determine the most economical, effective and possibly innovative best management practices, cumulative impacts of the projects would be zero. This is especially true in light of the fact that the SWPPPs would comply with requirements in the statewide General Permit adopted to deal with the cumulative problem of all storm-water discharges associated with construction activity. Permit conditions are consistent with the San Francisco Bay Regional Water Quality Control Board's erosion and sediment control policy (Resolution No. 80-5) and consistent with local agency ordinance and regulatory programs. The SWPPPs would also comply with the San Francisco Bay Region Basin Plan, the master policy document that contains descriptions of the legal, technical, and programmatic bases of water quality regulation in the San Francisco Bay region, which also establishes conditions (discharge prohibitions) that must be met at all times.

Second, as noted by one commentor, the EIS does not include a discussion of the cumulative effects of the project on the future restoration potential of Tennessee Hollow. New mitigation measure SD-1, *Protection of Tennessee Hollow* would ensure that no potential infill construction associated with Alternative 1 would interfere with future restoration of the stream drainage. Alternatives 2 through 5 would limit replacement construction to the 23-acre site and would have no effect on restoration of Tennessee Hollow. The only other relevant project in the cumulative scenario (Morton Street Field) has incorporated environmental conditions into the project to coordinate the recreational use of the field in the short term with future restoration planning (refer to Appendix G). Projects that were considered but excluded from the cumulative analysis (as identified in Table 10 of the EIS) include the *Trails and Bikeways Master Plan* (NPS 1999h) and the *Draft Vegetation Management Plan* (NPS 1999a). These projects would have no cumulative effect on Tennessee Hollow restoration for the following reasons:

- *Trails and Bikeways Master Plan* – The *Trails and Bikeways Master Plan* would direct future construction, modification and maintenance of Presidio-wide pedestrian and bicycling trails. The majority of Presidio trails were neither professionally aligned nor constructed with respect to soils, topography, or vegetation (including sensitive plant communities). The trails are often highly erosive, resulting in degradation. The project would provide improvements and priorities to correct erosion problems and relocate trails to minimize impacts on Tennessee Hollow. The project would also minimize human contact with the stream drainage, improve trail alignments and provide site-specific design and construction details to minimize impacts, including erosion, trampling, and social trail creation, all of which contribute to the degradation and future restoration potential of the stream drainage.

- *Draft Vegetation Management Plan* – The *Vegetation Management Plan* would provide for the restoration of the Tennessee Hollow stream drainage, enhance water resources by restoring natural drainage patterns, improve water quality through reduced sedimentation, and increase riparian and wetland habitat. An action plan for restoration of the stream drainage would identify specific impacts on water quality. If needed, Section 402 and 404 permits in compliance with the Clean Water Act would be obtained. Identified erosion problems would be corrected and soil loss would be reduced, resulting in a long-term beneficial impact on soils. Erosion in restoration areas would be limited by replanting and soil stabilization wherever soils are disturbed.

Finally, no additional cumulative analysis is required for native plant communities. The net cumulative effect of implementing detailed landscaping plans to enhance native plant communities in areas where no native vegetation would be disturbed by construction projects (as within the 23 acres and other sites contemplated by the Presidio Trust for development as identified in Table 9) would be highly beneficial. The landscaping plans would be consistent with the broad objectives for the management of landscape vegetation in the Presidio's *Draft Vegetation Management Plan* (pages 56 and 57) which guide the management of the Presidio's designed landscape vegetation and with the Planning and Design Guidelines.

5 *Availability of Trust's Financial Plan and Assumptions* *[14-11, 18-9, 19-1, 20-2, 23-14, 27-6, 44-1, 44-4, 44-39, 44-43, 44-58, 47-5, 47-6, 53-1]*

Several commentors criticized the Trust for having based its selection of the preferred alternative on financial necessity without disclosure of its budget assumptions. These commentors request that the EIS include the financial information on which the Trust based its decisions. The Trust's Financial Management Program, which contains the Trust's financial planning information, has been and continues to be publicly available. In response to the comments, it is now also being included as Appendix E of the Final EIS (for a more complete discussion of the FMP and its relationship to this EIS, please refer to Section 1.2.2 of the Final EIS).

These commentors asserted that the Trust should have made its financial assumptions and plan available for public comment and review. The Trust did so during development of the FMP. During the spring of 1998, to achieve the congressionally imposed mandate of preserving the Presidio without long-term federal funding, the Trust held a public Board meeting and a series of public workshops to develop the financial program. The public was invited to and participated in this process. Furthermore, following the document's submittal to Congress, the Trust mailed it to requestors on the Trust's mailing list, posted it on the Trust's website, and made it publicly available at the Trust library. To provide additional information and explanation to the public, the Presidio Trust published a detailed article in the September 1999 issue of the *Presidio Post*, the Presidio Trust's newsletter, and hosted an additional public meeting on the topic on September 27, 1999. Therefore, the Trust's financial plan and assumptions have been and continue to be available for public comment and review as part of this EIS process. See Section 5.1.2 of the EIS for further discussion.

As required by Section 105(b) of the Trust Act, the FMP illustrates how, with prudent investment and rigorous attention to financial performance, the Trust can achieve financial sustainability while also meeting its primary mission of preserving and renewing the park for current and future generations. Central to the document is the

concept of financial sustainability — the idea that the Presidio would provide for its own operational revenues, capital investment income, and replacement reserves required over the long term.

Commentors asserted that the public has been denied the opportunity to evaluate to what extent the proposed project fits into the Trust's overall financial plan. This information, though, is set forth in the FMP and in the background documents that led to its development. While today, federal appropriations provide most of the park's funding, by 2013 the Trust would be required to cover all of its costs through revenues. To achieve financial self-sufficiency, the Trust must earn enough revenue to fund operations and improvements and to repay debt. In fiscal year 2013, the FMP projects revenues of $36.6 million (1998 dollars). Those expected sources of revenue, broken out by Presidio planning area, show that the Letterman Complex is a critically necessary element of the Trust's plan to achieve financial self-sufficiency by 2013. The Letterman project is projected to contribute $5 million annually to Trust revenues, and 14 percent of all Trust revenues by 2013. Letterman Complex revenues are also a key source for funding long-term investments in other areas of the park.

Furthermore, the financial information and assumptions that underlie the FMP, and the Letterman Complex particularly, are subject to periodic scrutiny by both the public and Congress. The Trust Act requires that Congress, through the General Accounting Office (GAO), oversee the Trust's progress towards financial self-sufficiency. The progress toward meeting its preservation and financial goals must be presented to Congress and to the public annually in the Trust's year end reports. Pursuant to Section 106(a) of the Trust Act, GAO will in 2000 conduct an interim study of the Trust's activities and progress toward its goals, and develop an interim plan and schedule to reduce and replace the Trust's federal appropriations with lease income. Therefore, an essential need of the proposed project is to be able to demonstrate significant progress toward the self-sufficiency goal by three years after passage of the Trust Act and the first meeting of the Trust Board of Directors. A more complete discussion of the financial need for the proposed project, as well as analysis of the effects of eliminating or reducing Letterman Complex revenues, is set forth in master responses 10A and 10B.

6A *Adequacy of Scope of Alternatives* *[4-1, 10-1, 10-3, 10-4, 14-2, 19-1, 20-2, 44-2, 44-4, 44-38 through 44-40, 44-44, 44-58, 47-5, 49-3, 61-3, 61-15]*

Several commentors criticized the Trust for apparently failing to consider a full range of options as required by NEPA. A few suggest that certain alternatives, although included, would never have been seriously considered for selection and that the others failed to reflect the full range of options. On the contrary, the Trust analyzed the environmental impacts of six alternatives in the Draft EIS. Although it may have appeared unlikely that a no action alternative (Alternative 6) would be chosen, the Trust is required under NEPA to evaluate the impacts of a no action alternative, and it has done so. Similarly, even where there had been no proposal submitted for a Science and Education Center (Alternative 1), not to have considered this alternative given the history of the GMPA EIS would have eliminated an important baseline proposal and therefore would have been inappropriate. See also related discussion in master responses 1D and 4A. For a complete presentation of the full range of alternatives considered but rejected, refer to the discussion in Section 2.2 of the Final EIS.

Not only did the Trust consider a broad range of options both in the Draft EIS and otherwise, the process to identify options was designed to cast a wide net. In response to the unique financial, planning, and tenant

selection mandates of the Trust Act (see the discussion in master response 1A), of key importance to the Trust's process was to identify alternatives based upon proposals that the marketplace could actually offer. Building the process of alternative identification around this efficiency was intended to avoid the result of having studied and selected a prospective use for a particular site for which no tenant could ultimately be found, as was the case when NPS attempted to lease the LAMC/LAIR facilities following the Draft GMPA EIS.

When NPS issued its RFQ in 1993 soliciting proposals for reuse of the Letterman Complex, of 16 proposals received, only two were for medical laboratory use of LAIR. Of the two, NPS chose to enter into negotiations with the UCSF medical center. The other proposed user for LAIR was the California State Department of Health Services (DHS), proposing use of the laboratories for public health programs. By the time negotiations with UCSF had reached an impasse, however, the DHS had already committed to a project to consolidate its laboratory operations in Richmond, California. NPS then negotiated with the City of San Francisco Department of Public Health for temporary use of LAIR as laboratory and office space, but no agreement could be reached.

To avoid a similar result, the Trust, through an RFQ for the Letterman Complex, solicited market-based proposals. The Presidio Trust's notice of the availability of the RFQ for the Letterman Complex was sent to about 4,000 prospective users. The RFQ itself was sent to 2,400 organizations based on the response to initial mailing and targeted user groups. Consistent with the GMPA, biotechnology and medical research companies and organizations were included in the targeted user groups. The Presidio Trust identified prospective tenants using Dun and Bradstreet national listings for tenants in specific industries and San Francisco Bay Area listings of largest companies in specific industries. Industries targeted from the national database included Scientific Research and Development Services (SIC 5417) and pharmaceutical and medicine manufacturing (SIC 3254). Locally, the largest employers in the following areas were contacted: biotechnology/biopharmaceutical companies, medical device companies, and hospitals. Finally, the Presidio Trust made an extensive outreach to the real estate brokerage community in an effort to reach users actively seeking space. The extensive outreach was made in an effort to bring forth a scientific research and education user capable of offering to implement the specific use proposed in the GMPA for the LAMC/LAIR site. In the absence of a qualified respondent for this specific type of use, the Trust would have other alternatives, supported by the market, to consider.

The Trust received responses from 18 submitters representing a range of available alternatives. The Trust rejected the majority of proposals either because they failed to meet the minimum standards for development, including consistency with the General Objectives of the GMPA, or because the submitter failed to meet the minimum financial capability qualifications. The four remaining market-based alternatives ultimately studied in the Draft EIS represented real world possibilities rather than conceptual suggestions that the marketplace could not support. Although commentors would have preferred that the Trust study alternatives that involved a different program focus or different mix of organizational types, no minimally qualified proposers came forward to offer any such alternatives, and they were therefore not included within the range of alternatives studied in the Draft EIS (for a more complete discussion of the development of alternatives, please refer to Sections 2.1 and 2.2 of the Final EIS).

NEPA does not dictate otherwise. It is permissible under NEPA for the Trust to have solicited proposals that then form the basis of alternatives to be studied rather than studying theoretical alternatives that become the basis of later solicitation for proposals. The Trust had rational reasons for choosing the former approach, and

commentors are, therefore, mistaken in the belief that NEPA required the Trust to study a different range of alternatives (see master response 1D for further discussion).

Commentors criticized that the Trust improperly limited its range of development options by focusing its market-based solicitation on a 900,000-square-foot development within a 23-acre site within the Letterman Complex. On the contrary, the Trust had a number of rational bases for focusing its project in this way. With respect to the 900,000 square feet, this is the size of development needed to yield sufficient income to the Trust to meet the FMP's forecasted revenue for the Letterman Complex. Pre-existing and updated market analyses showed that a development of 900,000 square feet was needed to yield revenues sufficient to make the financial investment badly needed to address building and infrastructure improvements throughout the Presidio. Alternatives that were much smaller were not proposed for development because they could not generate sufficient revenue to meet early capital investment needs for the Presidio and because the economics of land development made a smaller project financially unattractive, given the need for the potential tenant to pay the fixed costs associated with redevelopment (see master response 10A and 10B for further explanation).

In addition, 900,000 square feet of development does not represent new construction over and above what already exists at the site, but rather replacement construction that generally reflects the existing development footprint of LAMC and LAIR. NPS carried this approximate footprint through to its 1994 RFQ for the Letterman Complex. The NPS RFQ assumed retention and reuse of LAIR and allowed for new replacement construction predominantly, although not entirely, within the 23-acre site to replace LAMC. Had NPS concluded a lease with UCSF as proposed in the RFQ, it would have involved occupancy by a single large anchor tenant largely within the 23-acre site, an intensity of use roughly comparable to the Army's pre-existing use on the 23-acre site.

Besides its recent history as a building site, the area immediately surrounding and within the 23-acre site is one of the only sites on the Presidio that historically have been subjected to intensive development because of its proximity to the urban area and amenities outside the Presidio boundary. Since the late 1890s, when the first Letterman Army Hospital was built, the 23 acres have been used intensively, first as a corridor to the adjacent city of San Francisco neighborhoods, later as a part of the Panama Pacific International Exposition, and finally as one of the busiest military hospitals in the country until the post-war era, when it became a regional medical center serving the surrounding military community (see Section 1.1.5). Therefore, the area immediately surrounding and within the 23-acre site has had a history of intensive use.

In addition to continuing the historic density and intensity of use on the 23-acre site, the Trust considered a number of other important reasons for limiting new replacement construction to the 23 acres. First was its potential for new construction under the GMPA. The GMPA severely limited the amount and location of new construction at other Presidio sites. The 23-acre site, being an already built-out area of the Presidio, is by far the largest among the limited number of sites identified in the GMPA for potential new construction. No other parcel could accommodate as large a development offering.

Also considered by the Trust was the absence of historic buildings on the 23-acre site. Unlike the remainder of the 60-acre complex, the 23-acre site did not house historic buildings, which add complexity and higher project costs, bringing down the revenue generation potential of a development offer. Thus, given the number of

historic buildings elsewhere within the Letterman Complex and at built-out areas of the Presidio other than this 23-acre site, there are limited opportunities for new construction on the Presidio of a scale needed to satisfy the FMP financial parameters for the Letterman Complex. Being a previously developed site, which already had over 800,000 square feet of existing but outdated non-historic building space, it presented a singular opportunity to offer a contiguous parcel for new development, a rarity in San Francisco.

Third, in addition to the 23-acre site offering maximum development flexibility, the physical and geographic characteristics of the site are appropriate to the proposed project definition. The site is unique in its access to transit service and urban amenities. It is easily accessible from downtown San Francisco, surrounding residential neighborhoods, and commercial districts, with access via Richardson Avenue to the Golden Gate Bridge. Restaurants, stores, and other commercial establishments are nearby, outside the park entrance. The site is also served directly by public transit connections to downtown San Francisco and regional destinations. All of these amenities are appropriate qualities for a site with concentrated development.

Lastly, the Trust factored in real estate marketing and development considerations in deciding to focus development within the 23 acres. While developing the RFQ, real estate development consultants advised the Trust that revenue-generating potential could be severely constrained unless development was contained to a site that could be easily marketed and managed. The consultants recommended that marketability could be improved by focusing infrastructure improvements to a limited area and by focusing on a contiguous site that would not otherwise be broken up by roadways or other buildings. Also, focusing the development on a limited parcel would make the offer more economically attractive to a larger universe of potential submitters and would increase the likelihood of receiving simplified but viable development proposals from single institutional users. Dealing with a single developer/user could significantly simplify the lease negotiation process as compared to dealing with multiple parties for a single development parcel. When all these factors were considered together, the 23-acre site presented an opportunity not available at other sites in the Presidio. At this site alone, the Trust could propose development of a sufficient size with capacity to generate the revenues needed to fund the maintenance and rehabilitation of badly deteriorating buildings and infrastructure at the remainder of the Presidio. For all these reasons, the Trust considered it rational to focus its solicitation on 900,000 square feet of new replacement development within the 23-acre parcel at the Letterman Complex.

6B Perception of Pre-Selection by the Trust [7-1, 14-3, 18-2, 19-1, 24-1, 44-15, 44-44, 44-56, 47-7, 49-8, 53-3, 61-3, 61-15]

Several commentors believe that the Trust used an improper selection process. They suggest that the Trust violated the NEPA prohibition on making a selection before the comment period had closed or before the NEPA process had been completed. That has not happened (for further discussion on these topics, please refer to Section 5.2 of the Final EIS). The identification of a preferred alternative before the close of the public comment period did not run afoul of NEPA. In fact, selection of a preferred alternative prior to the Final EIS is the favored procedure under NEPA. A “preferred alternative” is “the alternative which the agency believes would fulfill its statutory mission and responsibilities, giving consideration to economic, environmental, technological and other factors” (see Forty Questions No. 4a in CEQ 1981). CEQ regulations provide that an

agency shall "identify the agency's preferred alternative or alternatives, if one or more exists, in the draft statement and identify such alternative in the final statement" (40 C.F.R. Section 1502.14(e)).

The Trust has identified its preferred alternative, a Digital Arts Center (Alternative 5), to allow members of the public to focus their comments on the alternative that the Trust believes best meets its statutory goals. The Trust was not required under law to identify a preferred alternative in the Draft EIS, and indeed, the Trust had not yet selected a preferred alternative when the Draft EIS was prepared. The Trust is required, however, to identify a preferred alternative in the Final EIS. Page xiii of the Draft EIS noted this procedure. Although under NEPA the Trust is within the ambit of the CEQ regulations to identify a preferred alternative without public input, the Trust went beyond NEPA's requirements in identifying its preferred alternative before the Final EIS was prepared and then extending the public comment period in order to allow the public to provide focused comments on the preferred alternative. While one commentor believes that the identification of a preferred alternative does not afford the public adequate opportunity to comment on a range of alternatives, no alternative has been eliminated from selection as a result of identifying one alternative as preferred, and comments on all remaining alternatives have been fully considered.

Some commentors also criticized the Trust for having begun negotiations with the proponent of the preferred alternative, Letterman Digital Arts Ltd. (LDA), before completion of the NEPA process. These commentors assert that the start of negotiations makes hollow the Trust's point of view that no final determination has been made. On the contrary, NEPA requires only that the Trust not take any action that would preclude the choice of other alternatives (40 C.F.R. Sections 1502.2(f), 1506.1(a)). NEPA does not require that all planning be suspended during the EIS process. The Trust identified a Digital Arts Center as the preferred alternative, and entered negotiations with LDA as the development team submitting a proposal conforming to this alternative — similar to what NPS did with UCSF prior to release of the final GMPA EIS. Although the Trust has begun negotiations with LDA, these negotiations no more commit the Trust to a Digital Arts Center alternative than the RFQ committed the Trust to pursue development at all. No actions have been taken which prevent the Trust from ultimately using one of the alternative scenarios, or which otherwise commit the Trust to accepting LDA's proposal. In order to streamline the proposed project, the Trust has begun negotiations with LDA to test the bidder's willingness to adhere to the project's necessary parameters. As noted by the Trust's Executive Director, James Meadows, in a May 3, 1999 press release, however, if there were any problems with proceeding with the LDA proposal, whether environmental concerns or unrelated logistical disagreements, the Trust would be free to begin discussions with other project developers pursuant to the same EIS. For a complete discussion of the preferred alternative selection process, please refer to Section 5.2 of the EIS.

Finally, commentors raised concerns about misleading media coverage regarding the selection of the preferred alternative. The Trust is, of course, not responsible for the views or editorial stance of the press, although it has tried to correct erroneous reports of the Trust's actions. On June 14, 1999, after a number of printed reports incorrectly characterized the identification of the preferred alternative as a final decision, the Trust issued a press release confirming that all alternatives analyzed in the Draft EIS remain viable. The release stated, "Announcement of a preferred alternative land use will facilitate public involvement in the SEIS process. . . . The public and interested parties are invited to submit comments on the preferred alternative or any of the other alternatives described in the draft SEIS until the close of the public comment period. . . . After due consideration of public comment, the Trust will publish a final SEIS." Because of the confusion generated by

the erroneous media coverage, the Trust extended the public comment period on the Draft EIS for an additional 45 days. For further discussion, refer to Section 5.2 of the FEIS.

In sum, the Trust identified a preferred alternative and a lead candidate to carry out that alternative, and this choice was made in compliance with NEPA. Furthermore, as noted above, the Trust extended the public comment period to ensure that the public was given a chance to comment on the preferred alternative prior to the preparation of the Final EIS.

7A Consistency with Planning Guidelines [15-2, 18-7, 23-9, 25-2, 33-3, 44-2, 44-4, 44-13, 44-15 through 44-17, 44-26, 44-30, 44-38, 44-44, 47-3, 48-2, 49-5 through 49-7, 61-2, 61-27, 61-59, 61-61]

Several commentors are unclear as to the purpose of the Planning Guidelines. The intent of the Planning Guidelines is to ensure that a federal undertaking, like the proposed project, is in keeping with the character of the Presidio's National Historic Landmark district. The *Final Planning Guidelines for New Construction in the Letterman Complex*, provided in Appendix B of this Final EIS, provide a number of measures to guide the continuing development of the entire 60-acre Letterman Complex so that this and future Letterman Complex projects will be compatible with the scale, architectural character, and pedestrian-friendly quality of the existing historic setting. Measures for new construction within the 23-acre site include setbacks and height restrictions and provisions for inviting walkways, publicly accessible uses on the ground floor of buildings, careful massing of buildings, and framing of view corridors. Diligent attention to these Planning Guidelines will promote a sensitive integration of any new construction into the Letterman Complex's historic setting. Design Guidelines for new construction, which are now under development and must be submitted for oversight agency review under the Programmatic Agreement to meet the Trust's NHPA obligations, will incorporate the Final Planning Guidelines that have been publicly reviewed and finalized as part of this EIS (a more complete discussion of the relationship of planning and design guidelines to this EIS is set forth in Section 1.4 of the Final EIS).

Some commentors expressed concern that the preferred alternative falls short of the Planning Guidelines. As documented in the EIS, the preferred alternative is largely consistent with the Planning Guidelines, and where there are inconsistencies that constitute an adverse effect, they are identified and analyzed in Section 4.5.8 (Cultural Resources) of the Final EIS. Future planning and design review processes, described above and in Section 1.2 of the Final EIS, will strive for greater compliance with the Planning Guidelines to reduce these effects. The Planning Guidelines are a design tool to be used in the sequential design stages of the proposed project. Because the level of detail found in the Planning Guidelines is substantially greater than that of the preliminary conceptual plans requested of project proponents under the Letterman Complex RFP, the Trust has been working and would continue to work with the development team of the preferred alternative to ensure that the final site plans achieve a high degree of conformity to the Planning Guidelines. Should another alternative come to be preferred, the Trust would similarly work with that team.

One commentor requested an analysis of how each alternative meets the Planning Guidelines. Sections 4.1.8 through 4.5.8 (Cultural Resources) have been revised to respond to this comment. For each alternative, inconsistencies with the Planning Guidelines are described and an assessment of their effects on the historic

setting are analyzed and documented. Text has been added to the sections to further clarify these consequences. As described in mitigation measure CR-1, it is expected that the concept plan for the preferred alternative would be modified through the planning and design process to be more consistent with the Final Planning Guidelines and the Design Guidelines now under development to ensure that new development is in keeping with the character of the historic setting and that adverse effects to the National Historic Landmark are avoided.

Contrary to some commentors' assumptions, the Planning Guidelines are not the decision criteria for selection among alternatives. Rather, they provide guidance such that whatever alternative is chosen, the selected project may be integrated into the Presidio as a whole in a harmonious way. The Trust would continue to work with the development team of the preferred alternative, and ultimately with the team of the selected alternative, to maximize attention to the guidance provided by this document. Those discussions would continue through planning and through design and, indeed, until and during construction itself.

The process the Trust is following adheres to the direction provided in the NEPA Regulations: "Agencies shall integrate the NEPA process with other planning at the earliest possible time to insure that planning and decisions reflect environmental values, to avoid delays later in the process, and to head off potential conflicts" (40 CFR Section 1501.2). The planning process continues, while an EIS under NEPA necessarily captures a snapshot in time in the development of a project. Here the Planning Guidelines achieve a principal function — coming late enough in the evolution of a project to evolve meaningful review, but also making public the direction which the Trust expects the project to take as it approaches construction. This public knowledge of how the Trust envisions the continuing evolution of the proposed project helps ensure that there are no unexpected substantial changes in the project or significant new circumstances or information bearing on it or its impacts warranting supplemental NEPA review. Instead, the expected direction of change is to be in accord with the Planning Guidelines and is a matter of public knowledge.

The Presidio Trust strongly disagrees with some commentors' assertions that reliance on the Planning Guidelines as a mitigation measure is inappropriate. The GMPA EIS (pages 29 and 191) requires preparation of such guidelines to mitigate adverse effects of new construction on the National Historic Landmark. Incorporation of the Planning Guidelines into the Draft EIS (for revisions and publication in the Final EIS) was an effective vehicle to obtain broad public input on the Planning Guidelines. The Final Planning Guidelines in Appendix B will be incorporated into the Design Guidelines, which are now under development and must be submitted to the SHPO for review and comment as part of the section 106 consultation process. The Final Planning Guidelines will therefore be applied and continue to provide direction through the consultation and design review process under the Programmatic Agreement where there will be continuing review of their application by the ACHP, SHPO, NPS, and public after the environmental review process for this action is concluded. The Planning Guidelines have been prepared as a continuing interactive set of "guides" to help shape future actions as built and will serve as guides as the project moves through the process of negotiation, the signing of a lease, or the execution of a development agreement. The Trust's intent is to ensure that the project design and construction conforms as closely as practicable to the Planning and Design Guidelines, recognizing all the while that the guidelines themselves identify priorities and goals that may in their application be at odds with one another, necessitating tradeoffs among them. To the extent that the project design and construction is not now or may not in the future be consistent with the Planning and Design Guidelines, these departures have been identified and discussed as potential adverse effects in Section 4 of the EIS.

Finally, one commentor stated that impacts of the Planning Guidelines are not assessed in the EIS. The Trust has considered but identified no impacts that would result from implementation of the Planning Guidelines that have not been adequately analyzed in the EIS. Under Alternatives 2 through 5, replacement construction would be limited to the 23 acres, and no additional new development is expected throughout the remainder of the complex. See master response 4A. Future plans and actions within the balance of the 60-acre complex that would be guided by the Planning Guidelines (such as historic building rehabilitation or restoration of the Tennessee Hollow drainage) would be subject to environmental analysis, as deemed appropriate, when those projects are proposed. Infill construction, as proposed only in Alternative 1, would require an update to the Final Planning Guidelines and the preparation of design guidelines for infill construction in the historic complex (see mitigation CR-2 in the Final EIS). To project beyond those improvements analyzed either in this Final EIS or in the GMPA EIS concept for the Letterman Complex would be speculative and would not therefore require further NEPA review.

7B Design Review and Future Public Involvement [23-14, 25-2, 33-3, 44-5, 44-13, 44-15, 44-37, 44-38, 49-5 through 49-7, 61-4, 61-15, 65-7, 65-10]

Commentors raised concerns about the design review process for new construction and the level of public involvement in the process beyond this EIS. Several key points for public input occur during the planning and design process and during agency consultation. The first opportunity for public input on new construction at the Letterman Complex was integrated early into the NEPA process (see Section 1.4.2 of the EIS). The Presidio Trust developed a set of Draft Planning Guidelines, with public input, as a way to address potential adverse effects of new construction in the National Historic Landmark district. The Draft Planning Guidelines were included in the Draft EIS (Appendix B) and received public comment through that review process. To begin development of Design Guidelines, which more specifically address architectural and landscape issues for new construction, the Presidio Trust posted an initial draft on the Presidio Trust's website and made the draft Design Guidelines available for public comment on December 6, 1999. The Trust held a public workshop on the Draft Design Guidelines on December 13, 1999, and received public comment until December 27, 1999. Future similar opportunities for public input into the design will occur at the Conceptual Design phase. In addition, a public briefing at the conclusion of design development will afford an opportunity to understand how public comment on the conceptual design has been incorporated.

The Presidio Trust currently uses a design and construction review process as part of its permit issuance process for building and landscape rehabilitation projects. This review process ensures both code compliance as well as compliance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*. The design review process for new construction at the Letterman Complex will largely follow this design and construction permit review process already in place by the Trust, with the exception of creating more opportunities for public input in the design phase.

8 *Precedential Effect of the Letterman Project* *[19-1, 23-4, 23-25 through 23-27, 23-50, 23-73, 47-9]*

A few commentors lamented that the proposed project is unprecedented in the national park system, questioning the basis for the project. For a more complete response as to how and why the Presidio is different from other national parks and why the majority of the Presidio is under the administrative jurisdiction of the Trust rather than the NPS, refer to master response 1A-D and Section 1.1 of the EIS. The basic reorientation was, of course, made by Congress in enacting the Trust Act. That Act is a unique compromise enacted by Congress to protect the natural and cultural values of a magnificent base-now-national park, while making the 1,480-acre facility with 780 buildings in a predominantly urban area financially self-supporting. So unique is the circumstance and setting that the Trust does not believe that the Trust Act or its implementation can be used as precedent for other units of the national park system nationwide.

The proposed project is somewhat unprecedented in the national park system for a number of factors. Prime among these is the GGNRA Act, which designated the military base for transfer to the NPS once the facility was no longer needed by the military, and the Presidio Trust Act, which required that the facilities within the former military base be operated on a financially self-sufficient basis by year 2013. Approximately 650 building sites, structures and objects within the Presidio are listed on the National Register of Historic Places as being properties which contribute to a National Historic Landmark district. No other unit of the national park system approaches this number of useable historic structures. The combination of many useful and historic former military structures, in a natural setting in close proximity to a major urban center, has to a great degree rendered the planning process for the Presidio unique. The Trust does not believe that an analysis of the implications of the proposed project on projects or parks not covered by the unique statutory mandates of the Trust is an appropriate subject for analysis in this EIS.

9A *Conflicts of Interest* *[21-3, 23-37, 23-38, 27-9]*

One commentor asked questions concerning the existence and disclosure of any conflict of interest with respect to the preferred alternative selection process, and asserted without any support that the Trust Board of Directors was subject to improper influence in making its selection. In addition to being bound by ethics laws and regulations governing federal employees, the Board of Directors of the Presidio Trust is also subject to supplementary ethics guidelines consistent with federal laws and regulations concerning ethics, conflicts of interest, and financial disclosure. The Board adopted Supplementary Standards of Conduct for Directors of the Presidio Trust on October 22, 1998 by Board Resolution No. 99-2. No member of the Presidio Trust Board has had at any time any conflict of interest with respect to consideration of Letterman Digital Arts, Ltd. as a potential developer, or identification of the Letterman Digital Arts, Ltd. proposal as the preferred alternative. Although Board member Mary Murphy's law firm lists Lucas Film, Ltd. as one of its clients, there is no current representation of that or any other Lucas-related entity by Mary Murphy’s law firm. Although the Trust Board has concluded that there is no conflict of interest for Board member Murphy, she has nonetheless recused herself from any vote concerning the LDA proposal.

9B Improper Influence [23-1, 23-39 through 23-41, 23-48 through 23-50, 23-54, 23-57, 23-58, 27-1, 27-9]

One commentor sought to have the EIS list all social, personal, or professional connections or communications between the Trust and the preferred alternative proponents. CEQ regulations direct agencies to exclude such irrelevant material. Rather, an EIS document, which is restricted in length by law, analyzes only the environmental impacts of a proposed action and various alternatives to the action. Consequently, the EIS would not include the requested listing.

The same commentor questioned how the Board was lobbied during the selection process and how the preferred alternative was selected. Pursuant to the Trust's Public Outreach Policy, the Trust Board encourages all forms of public input and the use of the GGNRA Citizens Advisory Commission for formal public comment. The Trust Board considered all public comment received, whether at GGNRA Citizens Advisory Commission or Trust public meetings or in written or oral correspondence to the Trust. Although NEPA does not require hearings in addition to acceptance of written comments, on May 18, June 15, and July 20, 1999 the Trust held public meetings through the GGNRA Citizens Advisory Commission on the Draft EIS at which comments on the Draft EIS were accepted. In addition to formal comments at the hearings, the Trust received letters from the general public during the comment period, most of which favored the Digital Arts Center alternative. Neither the Trust nor the proponent of any alternative has hidden information relevant to the EIS analysis from the public. The preferred alternative was selected by vote of the Trust Board and recorded in Trust Board Resolution No. 99-16.

The same commentor suggested that the Trust Board, by holding public meetings through the GGNRA Citizens Advisory Commission, failed the EIS requirement for adequate public involvement because the Board itself should hold public hearings. On the contrary, the Trust is authorized by law to provide opportunities for public comment through the GGNRA Citizens Advisory Commission (Trust Act Section 104(c)(6)).

10A Financial Need for the Project [4-1, 5-9, 6-4, 21-1, 23-14, 33-5, 33-19, 36-1, 44-4, 44-43, 44-58, 46-8, 47-5, 47-6, 53-1, 55-5 through 55-8, 61-2, 61-22]

The proposed project evaluated in this EIS is needed to achieve the mandates of the Presidio Trust Act, most importantly the mandate that the Presidio become financially self-sufficient by 2013, while being managed in accordance with the General Objectives of the GMPA. Consistent with the congressionally required Financial Management Program for the Presidio (a financial forecast detailing how the Trust plans to achieve the Act's self-sufficiency requirement) the proposed project is intended to serve as an economic engine, generating early and significant revenue to pay for capital improvements and historic building rehabilitation that in turn will allow revenue generation at other areas of the Presidio. Section 1.2 of the Final EIS, Underlying Purpose and Need, discusses in detail the need for the proposed project as analyzed in the EIS. In view of this purpose and need, several commentors called for financial information to show how the proposed project supports the need for financial self-sufficiency requirement of the Trust Act.

The Financial Management Program – Congress not only set the self-sufficiency requirement, but also required the Trust, among its first official acts, to present to Congress the Trust's plan for achieving the mandate.

Pursuant to the requirements of the Trust Act, by July 8, 1998, the Trust presented to Congress a Financial Management Program (FMP, provided in Appendix E) detailing how the Presidio would become independent of federal appropriations within 15 years after the first meeting of the Trust Board of Directors (i.e., by July 8, 2013). Building upon the GMPA, which was a comprehensive programmatic plan for the Presidio, the FMP was to serve as the budgetary plan for meeting the newly imposed financial self-sufficiency requirements of the Trust Act.

The FMP presents a forecast of replacement reserves and capital and operating costs associated with leasing, maintenance, rehabilitation, repair, and improvement of property within the Trust's administrative jurisdiction at the Presidio. It further projects the recovery of these costs through a combination of near-term federal appropriation, borrowing from the U.S. Treasury, and lease revenues. Using these forecasts and assumptions, the FMP sets forth a declining schedule of appropriations until the date of financial self-sufficiency and demonstrates how, over the 1998 to 2013 time period, the Presidio Trust can complete needed upgrades to buildings, open space, and infrastructure to enable and enhance use of the Presidio as a national park by tenants and park visitors.

With regard to costs, operating the Presidio long term requires maintaining more than 750 buildings, 1,000 acres of open space, roads, utility systems, and all other aspects of maintaining a park and community without access to federal appropriations or taxation as a source of revenue. To support the Presidio long term, the annual cost of operations and replacement reserves is forecasted in the FMP at $35.7 million (all FMP projections are in 1998 dollars). This cost includes the projected annual operating budget of $24 million, which is based upon the 1998 NPS budget, with a minimum 20 percent reduction for operating efficiencies expected under the Trust's streamlined authorities. It also includes an annual set-aside of $11.5 million to build a fund that will pay for long-term capital improvements to both buildings and natural areas.

With respect to revenues, in order to break even by 2013 with a small margin, the FMP forecasts the need for $36.6 million of annual revenues.[7] The Trust's primary source of ongoing revenue to support this cost is revenue from the lease of residential and non-residential real estate. Lease revenues account for $35.6 million of the $36.6 million annual total, and the Letterman project lease is expected to be the single largest non-residential component of the revenue needed to meet the financial self-sufficiency plan of the FMP. With respect to total revenue needed to meet the financial self-sufficiency plan of the FMP, the Letterman project is expected to yield minimum annual ground lease revenue[8] of $5 million, accounting for one-third of non-residential lease revenues needed, or 14 percent of the total lease revenues.[9] To provide the revenue stream to

[7] As reflected in Appendix B of the FMP, more than $36.6 million is needed to achieve self-sufficiency in order to cover the estimated $5.1 million annual debt service payment through 2027.

[8] Ground leasing is a middle position between the sale of land and leasing of finished building space. The Trust is prohibited by law from selling land and does not have sufficient capital resources to redevelop the Letterman project to the stage of finished buildings. By offering a ground lease, the Trust can offer the right to use a land parcel for a definite length of time and can secure a tenant who is willing to invest the necessary capital to redevelop the site. The ground rent is the annual payment to the Trust for the land value. Land value is determined based upon the income stream that can be generated from the parcel after taking into account the investment required to generate income (e.g., capital and operating costs).

[9] The FMP submitted to Congress is based upon a minimum yield of $3.5 million from the Letterman Complex. This number reflected a conservative estimate of the potential revenue yield from leasing LAMC and LAIR (Concord Group 1998; Mancini-Mills 1998a). Subsequent market information supported potentially higher yields from the Letterman project (Mancini-Mills 1998b). Accordingly, the Trust set a minimum annual revenue target of $5 million. This target was validated by market submittals in response to the Trust's Letterman RFQ. The FMP financial forecasts have therefore been revised to reflect this and other valuation updates.

make the capital investments needed to assure the revenue targets in the FMP are met, this revenue stream must start early, phased in over several years, beginning in 2000. Further, the LAMC/LAIR tenant must be financially capable of funding more than $200 million in capital costs to redevelop the LAMC/LAIR facilities.

Because the FMP's self-sufficiency margin at the end of 15 years is quite small, if lease revenues from the proposed project are not generated in the amount and on the timetable forecast in the FMP, more income would need to be raised elsewhere on the Presidio, placing pressure to collect higher rents on other non-residential uses or to recoup the Letterman Complex shortfall from residential rents to the extent possible – prospects that are impracticable were rents are already set at market rate. In the alternative, the Trust would have to make operating expense cuts that would compromise the long-term sustainability of the Presidio.

The Letterman Complex as the Presidio's Economic Engine – In developing the FMP, the Trust used as its starting point the general land use categories of the GMPA and the financial information and studies that were prepared to support the GMPA, including NPS's July 1994 building leasing and financing implementation strategy (NPS 1994f). This supplement to the GMPA set forth NPS's financial strategy for implementing the GMPA, and it identified the Letterman Complex as the priority project at the Presidio. It viewed the LAMC/LAIR facilities, under the market conditions at the time, as the ideal project to fuel capital improvements elsewhere on the Presidio.

To better forecast costs and revenues in response to Congress's FMP command, the Trust took a fresh look at the GMPA leasing and financing strategy by initiating additional financial analysis and newly commissioned consultant studies to evaluate factors related to the newly enacted Trust Act mandates that had not been taken into account by NPS when the GMPA had been finalized (BAE 1998b, Concord Group 1998; Mancini-Mills 1998a and 1998b). For purposes of the FMP cash flow forecasts, these additional studies looked at a range of opportunities available for generating early and substantial revenues, and among other factors evaluated operating costs, potential housing revenues, leasing opportunities, and building rehabilitation and improvements. The information, assumptions, cash flow analyses, and real estate information in these studies formed the basis of and became part of the FMP revenue and cost forecasts for the Presidio as a whole.

In recognition of the importance of the Letterman Complex to the Presidio's self-sufficiency, as acknowledged in the GMPA's building leasing and financing strategy supplement, soon after establishment of the Trust, the Presidio Trust Board of Directors at its October 31, 1997 meeting authorized a study to update the redevelopment potential of the Letterman Complex (Board Resolution 98-3). The Board recognized that the market conditions in the Bay Area had changed drastically from 1994 when NPS negotiated with UCSF, and believed that an updated market analysis was necessary to fully evaluate the Letterman Complex's contribution to the self-sufficiency directive and the other Trust mandates. The resulting January 1998 study concluded that the Letterman Complex would be very competitive in the market, given a scarcity of campus-type locations in San Francisco and the inner Bay Area; that there was a window of opportunity to market the site, given the improving strength of the market; and that a ground lease supporting 900,000 square feet of new construction[10] could generate at least $3.5 million (Mancini-Mills 1998a). Subsequent market updates assumed a range of $3.8 million to $5.7 million for the opportunity (Mancini-Mills 1998b). Therefore, in March 1998, based in part on

[10] This study assumed the removal of certain non-historic buildings to arrive at the scenario of 900,000 square feet of new construction.

the conclusions of these studies, the Trust adopted a real estate policy that clearly establishes the proposed project as a priority for early implementation (Board Resolution 98-18). It was this early reanalysis of the potential financial contribution of the LAMC/LAIR site that served to update and refine NPS's earlier financial analysis of the Letterman Complex and inform the Trust's July 1998 FMP and subsequent Letterman RFQ.

In developing the FMP, the Trust established financial planning assumptions that provide a rational means of achieving financial self-sufficiency without requiring large capital expenditures, which Congress has declined to authorize, by the Trust. By leasing the LAMC/LAIR site early, as assumed in the GMPA and carried through to the FMP, the Trust can use generated revenues to build an economic base that would allow other Presidio projects to be undertaken, including historic building rehabilitation, open space improvements, and infrastructure upgrades that have limited, if any, revenue-generating potential.[11]

The FMP Establishes the Letterman Project Parameters – The FMP served to establish the parameters of the proposed project. These parameters (namely, demolition of LAMC/LAIR and 900,000 square feet of replacement construction) were made part of the Trust's Letterman RFQ and are currently under study in this EIS. In its RFQ, the Trust solicited a project calling for the demolition of the functionally obsolete LAMC/LAIR buildings. Demolition would be followed by redevelopment and use of newly constructed low- to mid-rise, or lower-profile mixed-use buildings totaling approximately 900,000 square feet and some infrastructure improvements within the 23-acre site within the Letterman Complex. The Presidio Trust, as the approval agency for the proposed project, would enter into a long-term ground lease and development agreement with a master tenant/development team to build and occupy the approximately 900,000 square feet of new replacement space on 23 of the 60 acres within the complex (Figure 3 in the EIS). Congress's command to establish the financial forecasts of the FMP, therefore, set not only the expected financial return but also indirectly set the square footage needed for the proposed project.

900,000 Square Feet of Replacement Construction – In order to yield the FMP's forecasted revenue for the Letterman Complex, a project of 900,000 square feet is needed (Mancini-Mills 1998a, Concord Group 1998). Valuation analyses for this size of development showed that revenue yields could range, depending upon a variety of financial variables, from $3.8 million to $5.7 million annually, an amount which under the FMP was needed to fuel the financial investment badly needed to address other building and infrastructure improvements throughout the Presidio (Mancini-Mills 1998b). Because the Trust could not be sure until the market responded to an actual proposal whether the market would yield the projected income or where within this range revenue yields would actually fall, it was considered financially imprudent to base the FMP on, or to later solicit, a smaller-scale project (refer to master response 10B for discussion of smaller-scale projects).

With respect to the 900,000 square feet, the FMP assumed the majority of the square footage would derive from demolition and replacement of both LAMC and LAIR. The failed NPS leasing initiative, marketing analysis, and the Trust Act requirements supported this FMP assumption. At the time of the 1994 NPS Letterman RFQ

[11] The Trust's leasing experience since the 1998 FMP was presented to Congress has validated the potential strength of the Letterman project as the economic foundation that will enable the Trust to move forward with more challenging historic rehabilitation projects. As among all of its leasing proposals to date, the Trust has received the strongest economic response to its Letterman leasing initiative. Several potential Letterman tenants made strong rent offers, allowing the Trust to then distinguish between offers based upon non-economic programmatic factors. Other leasing initiatives have involved complex historic rehabilitation transactions causing some to fail and resulting in constrained revenue generation potential for others.

and prior to finalizing the GMPA, LAIR was perceived to have a ready market to continue in its research use and the GMPA proposed it for reuse. The failed negotiations with UCSF and the State DHS, and the new unavailability of the City's DPH created real uncertainty with the possibility of finding a user for the existing facilities. Further, reuse barriers existed because of the high cost of rehabilitating LAMC to acceptable seismic standards for reuse as a laboratory and research facility and layout and other functional obsolescence problems at LAIR (BAR 1993). The GMPA acknowledged this uncertainty by identifying the Letterman Complex, as compared to other Presidio planning areas, as an area where change in use could occur through new replacement construction if existing buildings and improvements do not meet essential program and management needs.[12] When these factors were considered with the updated leasing analysis showing a substantially expanded Bay Area market for campus-setting developments and with the Trust Act requirement to consider reasonable competition in leasing, the FMP assumption to demolish both LAMC and LAIR was seen as rational for FMP forecasting purposes.

10B Effect of Reducing or Eliminating Revenue from the Letterman Project [4-1, 5-9, 44-4, 44-39, 44-43, 44-58, 46-8, 47-5, 53-1, 55-5 through 55-7, 61-2, 61-22]

Several commentors asked for scenarios on development of the Presidio without revenue from the proposed project or with reduced Letterman Complex revenue. To cover operating costs and build replacement reserves, the Trust needs to establish a base income of $36.6 million annually, as documented in the FMP. If less income were generated at the Letterman Complex, the Trust would need to generate more income elsewhere in the Presidio. Increasing revenue demands from other areas would challenge the goals of achieving a full range of housing, of rehabilitating historic buildings especially at the Main Post and Fort Scott, and of enhancing the natural areas of the park. Because of the opportunity it presents, unique at the Presidio, to demolish non-historic, outdated, and costly-to-maintain building space and to construct in its place more compatible, useful and cost-effective space, the proposed project offers the best opportunity for the Trust to achieve the income needed to support other programs and rehabilitation projects at the Presidio (see master response 10A).

Eliminating revenue from the Letterman Complex would result in at least a $5 million ongoing annual shortfall, approximately 14 percent of total revenues. It is not feasible to make up lost Letterman Complex revenue by increasing rents on other non-residential uses at Fort Scott, the Main Post or Public Health Service Hospital. Annual rents for these projects would need to increase by $4.24 per square foot, which is above the projected market rates assumed in the FMP, and the projects would have to be implemented all at once in the 2000 to 2001 time period. Neither condition is possible. Moreover, capital improvements would have to be funded and completed before lease revenues could commence. Given that most of these projects involve a historic rehabilitation effort, the additional revenue burden would compromise project feasibility or price the buildings out of the market for rehabilitated buildings.

[12] Updated market analysis and failed leasing initiatives since the GMPA was finalized has shown that retaining both or even one of the LAMC/LAIR facilities is inconsistent with meeting essential program and management needs and is incompatible with maximizing revenues from the project (Mancini-Mills 1998a).

Neither is it feasible to make up lost Letterman Complex revenue by increasing residential rents. If the Letterman Complex shortfall were recouped from residential leasing, average monthly rents would need to increase by $276 per unit ($5 million divided by 1,598 units), making most rents above market rates. The FMP was predicated on market-rate rents for most units. A limited number of units were assumed at a below-market rent to help accommodate a full range of workforce housing. The Trust considers these assumptions rational for purposes of the FMP forecast.

Several commentors suggested that, if the development at the Letterman Complex were reduced, the Trust would receive a proportionate reduction in ground rent. However, the economics of land development are not directly proportional. Many of the costs of development are fixed for any amount of development (for example, demolition of the existing buildings and certain infrastructure development or improvements). If the proposed project were reduced in scale, with no change in quality of construction and open space improvements, the land rent would reduce by more than a proportionate reduction in the scale of development. For example, a reduction to 700,000 square feet would result in a $2- to 3-million annual revenue shortfall.

The Trust issued the RFQ for 900,000 square feet of building space with a revenue target of about $5 million, understanding that market studies supported a range between $3.8 million and $5.7 million. It was rational for the Trust to offer a 900,000-square-foot opportunity without any reduction in scale because of the uncertainty about whether the offering would actually yield income within the forecasted range. To have offered less would have been to take a chance that the needed income could not be attained. The market responses to the RFQ and later RFP validated the aggressive revenue target and ensured that the Trust can meet the need for early and sufficient revenue from the project.

The net result of the analysis of reducing or eliminating revenue from the Letterman Complex is that, with less revenue, the Presidio Trust would be significantly challenged to achieve its aim of achieving financial self-sufficiency. Lower Letterman revenues would either force rent increases on other projects, which are likely to affect market acceptance, or necessitate capital improvement and operating expense cuts that would compromise the quality and long-run sustainability of the Presidio. The FMP forecasts a narrow margin between revenues and expenditures at self-sufficiency. If the Trust is able to exceed its revenue targets on early leasing efforts, it creates a needed cushion for potential economic downturns, unexpected expenses, or physical and programmatic enhancements that are not currently forecast.

11 Derivation of Proposed Building Area [21-5, 23-20, 27-7, 33-1,33-5,55-9, 61-12, 61-20, 61-22]

Several commentors asked how the 900,000-square-foot building area total was determined for the 23-acre site and how this relates to the overall building area of the 60-acre Letterman Complex. The proposed 900,000 square feet of new replacement construction approximates buildings on the 23-acre site. Within the 60-acre Letterman Complex, seven buildings totaling 23,000 square feet have been demolished in the complex by the NPS since 1994. This is consistent with the GMPA, which identifies an additional 13,000 square feet of non-historic building space that could be removed in the future. With these removals and the square footage derived by demolishing LAMC, LAIR (approximately 807,000 square feet), and two adjacent non-historic support

structures (33,000 square feet), the total square footage of the proposed project is approximately 876,000. For purposes of soliciting development proposals, the Trust approximated this square footage by soliciting development proposals of 900,000 square feet of new replacement construction while pledging that in the end the amount of occupied square footage at the Letterman Complex would not exceed the 1.3 million square feet total studied in the GMPA EIS. Table C-1 of the EIS identifies buildings proposed for demolition under each alternative.

Alternative 1, which closely reflects the GMPA vision for the LAMC/LAIR site, allowed for the retention of LAIR but the demolition of the former hospital (LAMC) and replacement construction of up to 503,000 square feet. Alternatives 2 through 5 assume demolition of LAIR and additional building demolition as described above, with total replacement construction up to 900,000 square feet. Because this is a departure from the GMPA and EIS of 1994, this EIS has been prepared to analyze the impacts of the new alternatives currently under consideration. Please refer to Section 1 (Purpose and Need), Sections 4.1.1 through 4.6.1 (Consistency with Approved Plans and Policies) and Appendix A (Revised Environmental Screening Form) for a further explanation about the relationship between the 1994 GMPA and EIS and this document. Also, refer to master responses 1D, 2A, and 6A.

The project as proposed will have a number of beneficial effects consistent with the GMPA. Consistent with the GMPA land use concept for the Presidio, replacement of existing square footage in already developed areas would allow for the restoration of open space elsewhere, such as along the Tennessee Hollow corridor on the western edge of the Letterman Complex. Furthermore, the total square footage for the Letterman Complex would not exceed the existing 1.3 million square feet and the height of new buildings would be equal to or less than that of nearby structures with a maximum height of 60 feet. The density, therefore, of new development as proposed on the 23-acre site would be more spread out than what currently exists in order to adhere to the proposed height restrictions. This would achieve a more compatible, lower height design that would improve the visual integrity of the complex and minimize impacts on scenic viewing. New construction would be designed and sited to be compatible with the Presidio's National Historic Landmark status and adhere as set forth in mitigation measure CR-1 to the Planning Guidelines for the Letterman Complex (Appendix B).

One commentor asked why underground parking areas are not included as part of the building area calculation. With regard to the square footage allocated to parking, text has been added to Section 2, Alternatives, to identify the proposed square footage of structured parking under each alternative. Square footage for structured parking, as defined in the Building Owners and Managers Association International's *Standard Method for Measuring Floor Area in Office Buildings*, is not considered rentable square footage and therefore was not calculated into the proposed replacement construction figures. This is consistent with current industry practice, in which underground parking is not calculated into the gross floor area of new construction, as demonstrated in the San Francisco Planning Code, Sections 102.9 and 204.5. Rather, parking requirements are directly related to building square footage and use category. Likewise, square footage for surface parking was also not calculated into new construction square footage totals.

One commentor has asked about future expansion possibilities for the preferred alternative. Replacement construction on the 23-acre site as proposed in Alternatives 2 through 5 would foreclose the opportunity for construction of new infill buildings within the adjacent historic hospital complex as was called for in the

GMPA. Therefore, no additional new construction beyond the proposed 900,000 square feet in Alternative 5 is expected. Under all alternatives analyzed, the total square footage for the entire 60-acre Letterman Complex would not exceed 1.3 million square feet. See also master response 4A.

12 Reliance on Mitigation Measures [44-39, 44-53, 44-54, 44-58, 46-11]

Several commentors seem to have misinterpreted the Presidio Trust's intentions with respect to the mitigation measures; "masking" of impacts was by no means intended. The EIS discusses the environmental impacts of the alternatives *before* mitigation, mitigation measures that could decrease impacts, and any adverse environmental effects that cannot be avoided *after* mitigation.[13] Thus, the EIS lays out not only the full range of environmental impacts, but also the full spectrum of appropriate mitigation. Commentors criticized the Planning Guidelines (mitigation measure CR-1), the Storm Water Pollution Prevention Plan (mitigation measure TS-1), and a detailed landscaping plan (mitigation measure NP-1) as examples of measures that may not serve to fully mitigate identified adverse effects. On the contrary, incorporation of the Planning Guidelines into the project, which would include design changes to reduce impacts on the historic setting, is in full accordance with CEQ NEPA Regulations (Sections 1505.2, 1505.3, and 1508.20). The reliance on the Planning Guidelines as a mitigation is fully discussed in Section 1.2 of the FEIS and in master response 7.

Formulating a Storm Water Pollution Prevention Plan (SWPPP) as requested by one commentor is not possible given the early development stage of the project. It is more appropriate to defer development of a SWPPP until prior to disturbing a site, since this approach provides the flexibility necessary to establish best management practices that can effectively address source control of pollutants during changing construction activities. Also, as a SWPPP specifies compliance with applicable water quality standards, this mitigation would ensure that discharges would not adversely impact water resources. Therefore, a SWPPP, although not presently prepared can serve to effectively mitigate potential pollution from construction activity.

Finally, the detailed landscaping plan was included as a mitigation measure to maximize the beneficial impact on native plant communities as discussed in Section P of Appendix A of the EIS.

While implementation of mitigation measures are not mandatory under the law, NEPA requires that all relevant, reasonable measures that could improve the project are to be identified (Forty Questions No. 19a in CEQ 1981). The Presidio Trust has done so. Furthermore, the Presidio Trust is fully committed to implementing all mitigation measures discussed in Section 4.7 as they appear in the text of the Final EIS, including incorporation into the project of the Planning Guidelines, SWPPP, and detailed landscaping plan. The Record of Decision rather than the EIS, however, is the appropriate vehicle to indicate that these measures will be adopted and enforced by the Presidio Trust.

One commentor also stated that many mitigation measures were missing or unquantified. The Presidio Trust is neither aware of any mitigation measures which are absent in the EIS, nor of any requirement that these

[13] Please note that the Presidio Trust did not indicate in the EIS, as inferred by one commentor, that water and traffic impacts would be "severe." Unavoidable adverse effects of the alternatives are discussed in Sections 4.1.12 through 4.6.12 (Unavoidable Adverse Effects) and include air quality, noise, and housing impacts.

measures be quantified.[14] An EIS is only required to discuss all practicable means to avoid impacts. Given the Trust's commitment to sustainability, it is highly unlikely that the water conservation measures called for in mitigation measure WS-2, *Water Supply- and Demand-Side Solution to Reduce Cumulative Impacts*, would be opposed, unenforced, or otherwise unsuccessful. Likewise, the reference to use of a webpage (devoted to transportation alternatives) to reduce parking demand must be viewed in its total context and is included as part of a package of TDM actions. Its listing in Section 4.5.7.6 in the Draft EIS was only provided to reveal a full range of appropriate mitigation, and it has been clarified in the same section in the Final EIS. The commentor is correct in stating that the Trust identifies mitigation measures that are outside its jurisdiction. As encouraged by the CEQ NEPA regulations, this will serve to alert those agencies that can implement these extra measures, and the Presidio Trust will encourage them to do so. However, the Presidio Trust could not commit to these measures outside of its responsibility as part of its Record of Decision.

13 *Impact on Water Supply* *[32-20, 36-3, 36-4, 44-39, 44-46, 44-54, 44-58, 46-12, 55-22, 55-23, 55-25, 55-26, 55-28 through 55-31, 56-16, 61-56]*

Several commentors stated that the general water conservation practices and the use of an unspecified alternative water supply called for in mitigation measure WS-2 may not be effective in resolving potential water supply problems at the Presidio. They further suggested onsite reclamation as an alternative way to meet the conservation goals articulated in the EIS. In order to respond to this suggestion and to manage waste in an environmentally responsible manner as contemplated in the General Objectives of the GMPA, the Presidio Trust would establish a reclaimed water system that would resolve park-wide potential water supply problems (see mitigation measure WT-1, *Water Reclamation Plant to Reduce Cumulative Impacts*, in Section 4.7 of the Final EIS). The system would include a water reclamation plant that is expected to be online concurrent with development of the 23-acre site. The water reclamation plant would be capable of reclaiming and treating approximately 200,000 gallons per day (gpd) of wastewater. This would be equivalent to 278 percent of the maximum sanitary flows of 78,000 gpd from the new development at the Letterman Complex as noted in Section G.2, Wastewater Treatment and Disposal in Appendix A of the Final EIS. The plant would produce tertiary treated water that would comply with water quality criteria, treatment processes, treatment reliability, monitoring and reporting, and restrictions for use of reclaimed water established by the California Department of Health Services in Title 22, Division 4 (Environmental Health) of the California Administrative Code. The reclaimed water would be made available to supply irrigation water for use in the Presidio and to lower overflow volumes of wastewater discharged to the city's combined sewer system.

Other commentors requested that the water savings resulting from implementing the water supply- and demand-side solutions to reduce park-wide impacts be quantified. Implementation of the water conservation practices in mitigation measure WS-2, *Water Supply- and Demand-Side Solution to Reduce Cumulative Impacts*, would save approximately 120,000 gpd of water (see potential water savings estimates in the mitigation measure). This water savings, combined with the 200,000 gpd of water saved through the proposed reclaimed water system, would yield approximately 320,000 gpd of water, which would more than compensate for the net cumulative peak shortfall of 286,000 gpd in typical and drier years with Alternative 5 (see Table 12 in Final EIS).

[14] Although quantification is not required, the Presidio Trust has done so when possible (see master response 13).

Finally, one commentor suggested that the measures in WS-2 themselves may lead to adverse impacts, and these should be quantified as well. It is highly unlikely that there would be any significant adverse impacts of proposed mitigation. The direct impacts of water conservation are beneficial and include: 1) the prevention of future water shortages; 2) the protection of the environment; and 3) cost savings on water bills. The direct impacts of water reclamation are beneficial and include: 1) the reduction in demand on high-quality potable water (by providing reclaimed water for nonpotable applications); 2) the provision of a reliable water source not subject to drought restrictions; 3) a reduction in pollutants that otherwise would be discharged into San Francisco Bay; and 4) support for the Presidio Trust's commitment to efficient use of water. It should be noted that reclaimed water use is strictly regulated to avoid public health risks. As far back as 1896, state health authorities began regulating wastewater use for the irrigation of specified crops. Today, water reclamation criteria established by the California Department of Health Services specify requirements for reclaimed water by category of use. Title 22 of the California Administrative Code contains standards for water quality, monitoring, reporting, and treatment reliability. These criteria are enforced by the Regional Water Quality Control Board to ensure that reclaimed water projects are safe, reliable, and protective of public health.

14 *Impact of Increased Sewage Flows* *[32-21, 36-6, 44-39, 44-46, 46-12, 46-13, 55-10 through 55-17, 55-30, 55-31]*

Several commentors, including the City and County of San Francisco, noted that while the city has sufficient dry weather capacity to accept maximum flows from the project (estimated at 78,000 gpd), new development would contribute incrementally to overflow volumes during major storm events. The public's concern of untreated wastewater being discharged into the bay through emergency overflows into the storm drain system was previously discussed in the GMPA EIS (page 106). The GMPA EIS concluded that the provision of city services for wastewater treatment and disposal due to park-wide development including the Letterman Complex would not burden its wastewater system because the city would be reimbursed through sewage fees (pages 170 and 171). Consequently, no mitigation measures were identified. However, at this time, in order to respond to these concerns, the Presidio Trust is proposing a water reclamation system that would substantially lower overflow volumes of wastewater discharged to the city's combined sewer system during wet weather events (see mitigation measure WT-1 and master response 13). In addition, the Presidio Trust is currently eliminating the park's sanitary sewer line cross-connects where storm water may discharge into the city's combined system (the park maintains separate sanitary and storm sewer systems). Re-piping of all cross-connects would also reduce overflow volumes attributable to storm water flows.

15 *Impact on Drainage, Watershed, and Water Quality* *[21-9, 36-7, 44-25, 44-41, 44-54, 44-58, 47-8, 61-30, 61-31, 61-34]*

General – Several commentors raised concerns over the impact of the project on drainage, watersheds, and water quality. The EIS includes various discussions of hydrologic impacts and corresponding mitigation measures to protect adjacent wetlands (Crissy Field), the stream drainage (Tennessee Hollow), and San Francisco Bay. Those discussions appear in Section D (Water Quality), Section G.3 (Storm Drainage), Section O (Wetlands and Stream Drainages), and Section S (Topography and Soils) in Appendix A of the EIS, and the

mitigation measures are identified again in Section 4.7 of the Final EIS. It should be noted, as discussed in Section D of Appendix A, that the impact topic of water quality was adequately analyzed on pages 106 and 107 of the Presidio GMPA EIS and previously dismissed from further consideration on page 137. It was concluded that proposed improvements would have only minimal effects on water quality in San Francisco Bay. Since preparation of the GMPA EIS, this conclusion has been further supported by:

- Hydrologic and hydraulic analysis conducted for the Letterman Complex subbasins which identified operational procedures and storm water system improvements that would be implemented to reduce pollutant sources and pollutant concentrations in storm water runoff (Dames & Moore 1994);
- NPS staff who evaluated the quality and anticipated the quantity of storm water that would be discharged into the Crissy Field restored wetlands from the 23-acre site (Brian Ullensvang, NPS Remediation Specialist, pers. comm.); and
- California Department of Water Resources staff who reviewed the preliminary analysis for the project and determined that it would not impact bay water quality, and they therefore have no concerns (California Department of Water Resources 1999).

Estimate of Storm Water Volume – Several commentors suggested that the EIS should estimate the volume of storm water collected and reused, and the volume discharged to the bay. In response to this suggestion, as noted in Section D, Water Quality in Appendix A of the EIS, the project would shift the majority of land cover from pavement to landscaped or pervious area. This shift would significantly reduce the amount of storm-water runoff and the amount of pollutants that eventually would reach the bay. Currently the 23-acre site is about 70 percent paving, hardscape, or building. Under the preferred alternative, this would be reduced to 40 percent, with the remaining 60 percent becoming pervious landscaped areas. In addition, the alternative would incorporate rainfall harvesting, capturing storm-water runoff during the winter from roofs and hardscape areas to be stored and used for summer irrigation. This would further reduce the amount of impervious surface runoff that generally contains significantly higher pollutant loads than pervious landscaped areas.

The resulting average annual runoff for Alternative 5, based on 22 inches of annual rainfall, would be 570,000 cubic feet (cf) of runoff from pervious surfaces and 510,000 cf from landscaped surfaces. The proposed rainfall harvesting system would capture 400,000 of the 570,000 cf from pervious surfaces so the net runoff would be 170,000 cf from this cover type, giving a total average annual runoff to the bay of 680,000 cf. The 23-acre site currently produces a total runoff of about 1,300,000 cf, or about twice the planned site runoff. In addition, 80 percent of this runoff is from impervious surfaces, mostly paving.

Impact on Tennessee Hollow Riparian Corridor and Crissy Field Wetlands – Several commentors requested that the EIS confirm whether storm-water drainage would be directed to Tennessee Hollow or Crissy Field. According to Brian Ullensvang, NPS Remediation Specialist, and Doug Kern with the Urban Watershed Project, all storm-water outflow from the 23-acre site would drain to the Crissy Field wetlands. Therefore, as discussed in Section O, Wetlands and Stream Drainages within Appendix A of the EIS, because storm water from the 23-acre site would not discharge into the same storm drain system that receives runoff from Tennessee Hollow and Alternatives 2 through 5 would limit new construction to the 23 acres, proposed development

activities would have no effect on the proposed riparian corridor. A large area of the 23-acre site is comprised of a relatively impermeable surface (asphalt and concrete) and has a high runoff coefficient. Alternatives 2 through 5 would remove much of this asphalt and concrete and replace it with landscaping to allow greater infiltration. These alternatives would result in a lower runoff coefficient and, therefore, less runoff that would discharge into the storm drain system that connects to the Crissy Field restored wetlands.

Pollutants in Bay Discharges – Several commentors requested that the EIS specify projected concentrations of pollutants in bay discharges. Two major factors from the project's design would result in the reduction of non-point source pollutants discharged to the bay. First, since the preferred alternative would shift land cover from paving to landscaped areas, the total amount of runoff would be less. This would result in a smaller pollutant load to the bay. Second, since generally the concentration of pollutants from paved areas is significantly higher than from landscaped areas, the concentration levels of pollutants would also be less, further reducing the pollutant load to the bay. Reduction in pollutant loads from the various land cover types can be used to determine the resulting reduction in pollutant mass from the 23-acre site. Suspended solids, biological oxygen demand, and total nitrogen are three of the main pollutants of concern for non-point source pollution. The total mass load reduction for all three pollutants would be approximately 60 percent on an annual basis.

Monitoring and Maintenance of Lagoon – Alternative 5 calls for the use of a portion of the lagoon as a biofilter. One commentor asked how this area would be monitored and maintained. The lagoon would be used to assist in the reduction of pollutants from impacts such as waterfowl use and runoff loading. Biofiltering by aquatic plants, aeration and biofilter management measures (such as periodic reedgrass harvesting to neutralize the potential buildup of pollutants) is proposed in order to ensure a high level of water quality. The Storm Water Pollution Prevention Plan, as discussed in mitigation measure TS-1, would include a monitoring program and reporting requirements for site inspections, reports and certifications, and sampling and analysis to ensure that at all times storm-water discharges would not cause or contribute to an exceedance of any applicable water quality standards contained in the Statewide Water Quality Control Plan and/or the San Francisco Bay Region Basin Plan.

16 Impact on Natural Resources *[14-14, 40-1, 44-24, 44-39, 44-41, 44-45, 44-58, 46-10, 47-8, 53-2, 53-4, 55-3]*

General – Several commentors stated that the EIS should include a discussion of impacts on natural resources, including resident avian species that inhabit the site's trees. NEPA requires a lead agency to identify and eliminate from detailed study the issues which are not significant or which have been covered by prior environmental review, narrowing the discussion of these issues in the EIS to a brief presentation of why they would not have a significant effect on the environment or providing a reference to their coverage elsewhere (CEQ NEPA Regulation Section 1501.7(a)(3)). To satisfy this requirement, the EIS focuses on significant environmental impacts. The main body of the EIS provides detailed information only for those specific resources and significant impacts that were not adequately examined in the GMPA EIS as determined in the tiering analysis in Appendix A of the EIS. Effects on the area's natural resources were dismissed from further analysis based on site-specific information and analyses included in the appendix. Nevertheless, the commentor is referred to Section Q, Wildlife in Appendix A of the EIS for an assessment of the impacts of the project on

the trees that provide the highest value wildlife habitat within the 23-acre site, and the wildlife that are known to have been attracted to these trees (based on observed bird diversity and use). Consultation with wildlife resource specialists from the National Park Service (NPS 1998b), and surveys of vegetation and wildlife conducted for the Presidio's *Vegetation Management Plan* (VMP) and Environmental Assessment provided the requisite information for the analysis of impacts (and avoided the need to unnecessarily duplicate data already available). In fact, the Presidio Trust used the data and knowledge of the NPS to discover how to avoid adverse impacts on the natural environment early on to control visitor use, to protect native trees and valuable wildlife habitat at the site, and to design the best possible project from a natural resources point of view. U.S. Fish and Wildlife Service staff who reviewed the Draft EIS indicated that their concerns were adequately addressed and that they had no further comment (Presidio Trust 1999d).

Additional Information on Mature Trees – Several commentors requested that the EIS provide additional information on mature trees within the 23-acre site. In response to this request, a reconnaissance level site survey was conducted under the direction of the Presidio Trust to identify the numbers and species of trees, and their general condition and age.[15] Based on the results of the survey, which are now incorporated into Section P, Native Plant Communities of Appendix A of the EIS, replacement construction under Alternatives 2 through 5 could require the removal of up to 317 of the 408 mature trees within the 23-acre site. Future planning would take into account opportunities for preserving existing mature trees; salvaging trees suitable for replanting to the extent feasible; remedial actions to improve vigor and construction survivability of preserved and replanted trees; and the addition/replacement of trees during building landscape renovation. Removal of these trees is considered a less-than-significant impact because:

- none of the trees to be removed qualify as heritage landmark trees[16] (Nick Weeks, NPS Senior Landscape Architect, pers. comm.);
- none of the trees to be removed are native species;[17]
- as discussed above, trees providing the most valuable wildlife habitat would be preserved and protected in place (see Section Q, Wildlife in Appendix A). These trees represent approximately 22 percent of the total trees to be preserved within the site;
- many of the trees to be removed are restricted or conditionally prohibited from use within designed landscapes within the Presidio because of existing and potential problems (disease, pest, and fire potential; invasive spread into native plant communities; short life-span; view-blocking tree height; or inappropriate soil or climatic conditions). These trees include the Monterey pines, pittosporums, liquidambars, and acacias which represent approximately 27 percent of the total trees to be removed;
- many of the trees to be removed have strikingly different characteristics from historic species, would not maintain the visual integrity of the landscape which contributes to the National Historic Landmark District status, and are therefore considered unsuitable in historic landscapes. These trees include the Australian bush

[15] A copy of the *Tree Report for the Letterman Complex* prepared by HortScience, Inc. (2000) for the Presidio Trust is available for review at the Presidio Trust library.
[16] Defined in the draft VMP as trees that have historic value, are outstanding botanical specimens, display unique traits, or serve a particular aesthetic function in the landscape.
[17] Defined in the draft VMP as species that were most likely found on the Presidio prior to European settlement. Species native to California, but not native locally to the Presidio, are considered nonnative species.

cherry, lemon bottlebrush, Forrest's silver fir, atlas cedar, yew pine, and fern pine which represent approximately 4 percent of the total trees to be removed; and

- other trees more suitable to supplement historically planted species within the Presidio to better address the goals and objectives of the Vegetation Management Plan (NPS 1999b) would be planted as part of the landscaping plan for the non-historic building landscape renovation as permitted under the Vegetation Management Plan (NPS 1999b, page 59).

17 Impact on Quality of Life of Neighbors [6-4,15-3, 23-56, 33-9, 55-4]

Several commentors questioned whether the Presidio Trust considered the impacts of the project on the surrounding residential neighborhood. Long-term effects on the surrounding neighborhoods are assessed in the traffic and transportation systems, air quality, and noise discussions for each alternative in Section 4, Environmental Consequences, of the EIS. A construction traffic management plan would be developed to further specify routes, times of operation, and other factors to mitigate construction impacts on neighbors both inside and outside of the park. The overall supply of parking would be monitored to accommodate onsite parking demand, encourage transit use and other non-automobile modes of travel, and discourage parking in the adjacent neighborhood. During demolition and construction, contractors and other equipment operators would be required to comply with the terms of provisions equivalent to the standards in the San Francisco Noise Ordinance. To further reduce noise impacts, appropriate barriers would be placed at a distance of 250 feet between sensitive receptors and construction sites and stationary equipment such as compressors and crushers.

In addition, Planning Guidelines in Appendix B of the EIS describe the relationship of the site to the residential character of the adjacent neighborhood and provide measures, including setbacks, building height limitations and vegetative buffers, to minimize impacts on neighbors outside the Presidio wall. The project provides for adequate buffers, visual screening and public access to limit the impact of new development on the neighborhood. A network of public open spaces and pedestrian connections to enhance public enjoyment of the site, and strong pedestrian and bicycle connections would be created to link the Letterman Complex to adjacent neighborhoods. Scenic and historic views into and out of the complex would be preserved and enhanced, particularly those views into the site from Lombard and Chestnut streets. The Lyon Street edge would include a 30-foot setback from the historic stone boundary wall to ensure that buildings along this edge would be compatible in scale with the residential character of existing buildings along Lyon Street. With a 30-foot setback, new buildings on the 23-acre site would be separated from the existing residential buildings on the east edge of Lyon Street by approximately 120 feet. This compares favorably to the typical width of 70 to 80 feet between opposing building façades in the nearby neighborhood. Finally, the existing historic tree windrow would be maintained and supplemented by additional planting to visually screen the new buildings from neighbors along Lombard Street. A pedestrian gate on axis with Chestnut Street would be created to also allow for improved pedestrian access into the 23-acre site.

18 *New Direct Access to the Letterman Complex from Richardson Avenue [4-2, 5-3, 6-3, 11-2, 11-3, 12-10, 12-11, 13-4, 13-5, 13-7, 13-8, 21-7, 21-8, 36-8, 36-10, 36-11, 39-2, 44-39, 44-58, 46-7, 55-36, 55-37, 55-39, 55-40, 55-43 through 55-47, 61-40, 61-45, 61-46]*

In order to provide direct vehicular access to the 23-acre site, the Trust has proposed two new intersections on Richardson Avenue (U.S. Highway 101). The new intersections involve reconfiguration of the intersection of Richardson Avenue/Lyon Street/Gorgas Avenue, including relocation of an existing traffic signal at Francisco Street/Richardson Avenue/Lyon Street and elimination of cross-street vehicle flow on Francisco Street across Richardson Avenue. To advance this project, a highway and traffic design firm under the direction of the Presidio Trust would prepare a project study report (PSR) for Caltrans review. Alternatives to the design shown in the EIS would be identified and studied as part of the Caltrans PSR process. Neighborhood input and coordination would be an important component of the PSR.

Some commentors questioned the need for new access and why two new intersections were required. The new intersections on Richardson Avenue are needed primarily because vehicular capacity to the Letterman Complex is severely constrained at the intersection of Lombard Street and Richardson Avenue, which is the only access to the Letterman Complex from downtown San Francisco and the East Bay. The left-turn pocket that allows vehicles to continue westbound on Lombard Street into the park can accommodate only four queuing vehicles. This pocket is already at or over capacity in peak hours, blocking westbound traffic on Lombard Street. Development on the site and overall park development will further exacerbate this condition. The 1994 GMPA EIS noted that this intersection falls to unacceptably low levels of service by the year 2010 (p. 181). In addition, the new intersections allow traffic from the 23-acre site to access U.S. Highway 101 toward the Golden Gate Bridge directly, a movement not currently available.

Installation of two traffic signals on Richardson Avenue would allow westbound left-turns into the park to be accommodated at the southernmost intersection, and left-turns out of the Presidio to be accommodated at the northernmost intersection. Traffic analysis performed for the EIS by its traffic consultant, Wilbur Smith Associates, indicated that a three-phase signal allowing all movements at one of the intersections would not work during the morning peak hour when traffic coming from the Golden Gate Bridge to Lombard Street is very heavy. Consequently, two signals, each having two phases, are proposed. The southern intersection would allow westbound left-turning traffic into the site, and the northern intersection would accommodate left-turns out of the Presidio toward the Golden Gate Bridge. Providing two-phase signals would minimize the amount of time that through movements on Richardson Avenue would be stopped, thereby minimizing delay to the through traffic.

Some residents in the vicinity of the intersections were concerned about potential traffic and parking impacts on their homes. Eliminating the through movement on Francisco Street would affect some access routes to residences on Richardson Avenue depending on which side of Richardson Avenue they are located on and from which direction they are accessed. The principal change would involve the use of Chestnut Street instead of Francisco Street, a very minor difference. Reconfiguration of the intersection of Richardson Avenue/Lyon Street/Gorgas Avenue would not restrict access to residential driveways. On-street parking would not be

removed, and therefore the buffer area currently provided by the parked vehicles (between the driveways and the vehicular traffic on Richardson Avenue) would be maintained.

In addition to residences in the area, concern was expressed about access to the Exploratorium and the Palace of Fine Arts, directly across Richardson Avenue from the 23-acre site. In fact, the proposed new intersections on Richardson Avenue would improve access to the Exploratorium by accommodating turns in and out of the complex that currently cannot be made directly from U.S. Highway 101: eastbound into the site and eastbound leaving the site.

Some commentors expressed concern about traffic flow on U.S. Highway 101. The traffic impact analysis conducted for the six alternatives evaluated the traffic operating conditions on Richardson Avenue with the reconfigured signalized intersection of Richardson Avenue/Lyon Street/Gorgas Avenue and the new signalized intersection of Richardson Avenue/Gorgas Avenue access road. The results of the analysis are presented in Table 18 of the EIS.

The proposed intersection design allows for the same number of through lanes (three per direction) currently available on Richardson Avenue. It was analyzed under both p.m. peak-hour and a.m. peak-hour conditions. The a.m. peak-hour was determined to be the most critical time period for this particular intersection because the large volume of eastbound through traffic in the morning conflicts with the proposed left-turn movements from Gorgas Avenue to westbound Richardson Avenue and from westbound Richardson Avenue into the Presidio. Providing a phase of the proposed signal that allows for the westbound left-turn movement would cause queues to develop for the eastbound traffic flow. The length of time allotted for the westbound left-turn movement would be minimized to maximize the amount of green light time allotted to the eastbound through movement.

The distance between the point at which Richardson Avenue diverges from Doyle Drive and the location of the proposed new intersection is approximately 1,400 feet. The queue length from the northernmost intersection of the two-intersection configuration is estimated to be 841 feet in length on average during the year 2010 a.m. peak-hour worst condition and would reach a maximum length of 916 feet. Thus, there would be a minimum distance of 484 feet between the back of the queue and point at which Richardson Avenue diverges from Doyle Drive.

Eastbound traffic on Doyle Drive and Richardson Avenue traveling at 50 mph would need approximately 427 feet to stop before reaching the back of the queue from the new intersection. Therefore, traffic exiting onto Richardson Avenue would not have to begin decelerating until exiting the traffic stream on Doyle Drive. A “Signal Ahead – Be Prepared To Stop” warning sign would need to be placed about 57 feet beyond the point where traffic bound for Richardson Avenue would diverge from Doyle Drive.

Some commentors expressed concern about coordinating external access into the 23-acre site with circulation on the site, and designing intersections along Gorgas Avenue to prevent potential backup of incoming traffic onto U.S. Highway 101. The Trust will be coordinating the two relevant projects: 1) the Caltrans PSR for external access, and 2) planning and design of the 23-acre site. The design of Gorgas Avenue, as well as its intersection with Lyon Street/Richardson Avenue and entry into the Letterman Complex, will be reviewed by

the Presidio Trust as part of its design review process to ensure that the traffic on the internal roadway network does not impact traffic operations external to the site, and that traffic associated with the Letterman Complex does not affect other users of the Presidio.

Although the intersections along Gorgas Avenue were not analyzed directly in the EIS, they will be coordinated to work with the intersections along Richardson Avenue to prevent potential backups. Traffic entering Gorgas Avenue from Richardson Avenue at the new intersection would have a free right turn onto Gorgas Avenue westbound, while traffic on Gorgas Avenue would be stop-sign controlled. A similar free left turn would be provided from Gorgas Avenue westbound into the planned garage entrance for the Letterman Complex development. This network of stop signs and free turns would ensure that traffic entering and exiting via the new intersections would not impact Richardson Avenue operations. Traffic engineering principles and the Planning Guidelines will be applied in the detailed design of the internal roadway network, and will consider the needs of adjacent uses, such as the Thoreau Center for Sustainability. For example, separate turn pockets could be provided along Gorgas Avenue to ensure that Letterman Complex traffic does not impact through traffic on Gorgas Avenue, and signals on Gorgas Avenue would be coordinated with those on Richardson Avenue. The two new intersections on Richardson Avenue would provide sufficient access for the volume of traffic expected to use the Gorgas Avenue Gate to access the 23-acre site as well as other parts of the Presidio.

The new proposed intersections would require minor changes in pedestrian access to Golden Gate Transit and MUNI bus stops. The transit stop for buses traveling westbound on Richardson Avenue would be relocated to a point immediately north of Lyon Street, as shown on Figure 15. Pedestrians walking between this bus stop and the Presidio would cross at the crosswalk on the north side of Lyon Street. The bus stop for the eastbound direction of Richardson Avenue would remain at its current location, but pedestrians crossing Richardson Avenue to this bus stop would cross at the new intersection at Lyon Street rather than at Francisco Street as they do currently.

Some commentors inquired regarding the funding and approval process for the intersections. No funding source is currently identified for this project. There is currently no agreement with Caltrans on the proposed intersection. Such an agreement would come upon satisfactory resolution of the PSR and permitting process.

19 Impact of Transportation Demand Management on Traffic Volumes [2-8, 5-7, 23-14, 25-6, 36-17, 39-5, 55-35, 55-42, 56-21, 61-39, 61-50, 62-2, 62-6, 62-8]

A number of commentors raised questions about the impact of the new development within the Letterman Complex and other planned development on traffic within and adjacent to the Presidio. Some of these commentors have expressed concern that it may not be possible to achieve the Trust's goal of making the Presidio a sustainable national park by 2013 without a decrease in dependence on the automobile. Mitigation measures TR-1 through TR-3 would mitigate the traffic impacts of Alternatives 1 through 5 to a less-than-significant level. In addition, the EIS identified Transportation Demand Management (TDM) strategies that would further reduce the reliance on the automobile and would encourage non-automobile modes of transportation (Table D-12 in Appendix D of the Final EIS summarizes the strategies for all alternatives).

Using the GMPA as a starting point, the Presidio Trust is developing a TDM program for the Presidio, which would establish actions to be taken by the Presidio Trust and all park tenants and occupants to improve transit, pedestrian and bicycle conditions, and reduce automobile usage by all tenants, occupants and visitors. The Presidio Trust would require all tenants and occupants to participate in the TDM program for the Presidio, including:

- Carpool/vanpool programs
- Periodic monitoring of traffic volume and mode choice among Presidio residents and employees
- Transit and ridesharing information disseminated on kiosks within the park, the Presidio Trust's website, and employee orientation programs
- Parking management program
- Secure bicycle parking
- Mandatory event-specific TDM programs for all special events
- Onsite sale of transit passes
- Clean-fuel shuttle bus serving the Letterman Complex and the remainder of the Main Post
- A transit hub in the Letterman Complex/Main Post area that would facilitate transfers between public transit buses and the Presidio shuttle buses
- Express bus service to regional transit connection programs (i.e., BART and the Transbay Terminal).

Program performance would be monitored through means consistent with the TDM program, including traffic counts and user surveys.

Each of the proponents in Alternatives 2 through 5 proposed specific elements of the TDM program for the 23-acre site. The TDM elements proposed by the proponent of the preferred alternative included the following (see Table D-12 for a complete listing):

- Onsite Transportation Coordinator
- Guaranteed-ride-home program
- Webpage devoted to transportation alternatives
- Flex-time policies
- Telecommuting policies
- Onsite support services
- Preferential carpool/vanpool parking.

The Letterman Complex lease would include provisions requiring the tenant to participate in the TDM program. The tenant's Transportation Coordinator would assist the Presidio Trust's Transportation Manager to maximize participation in the TDM program.

Some commentors questioned how TDM was accounted for in determining automobile mode share calculations. Determining the overall effectiveness of TDM measures in reducing single-occupant-vehicle trips is complex, and depends on the elements of each TDM program, the degree to which the program is promoted, and the environment in which it is placed. The Draft EIS analysis assumes the same 70 percent automobile mode share analyzed in the GMPA. The GMPA calculations considered implementation of a limited number of TDM and transit improvements: constrained parking, extension of the MUNI 41/45 line to the Main Post, and an internal shuttle bus. Furthermore, the Presidio Gate volumes forecasted for the year 2010 in the GMPA were also used to represent year 2010 conditions in the EIS. The TDM plan is assumed to be in place under each of the alternatives. Alternative 5 TDM elements include strategies that the proponent has successfully utilized in TDM programs at their current worksites to exceed trip reduction requirements. LDA's overall TDM strategy concept relies on providing a comprehensive set of positive rewards (incentives) such as promotional events, rideshare incentives, many onsite support services, secure bicycle parking, and preferential car/vanpool parking strategies. Should Alternative 5 be selected, the Presidio Trust would monitor and evaluate LDA's TDM program, as detailed in mitigation measure TR-8, to ensure that the required mode split (70 percent vehicle use maximum and 1.4 average vehicle ridership (AVR) minimum) is achieved. Following the annual monitoring, TDM strategies that are found to be ineffective or underutilized would be improved or replaced with other strategies. The Presidio Trust will work closely with the proponent to insure successful implementation of the TDM programs.

Some commentors requested specific information on TDM measures for the preferred alternative, reasons for selection of TDM strategies and the estimated amount of vehicular traffic that could be eliminated through application of these strategies. Alternative 5 TDM elements include strategies that the proponent has successfully utilized in TDM programs at their current worksites to exceed trip reduction requirements and emphasizes a comprehensive set of positive rewards (incentives) such as promotional events, rideshare incentives, many onsite support services, secure bicycle parking, and preferential car/vanpool parking.

Based on current experience, the proponent of the preferred alternative has estimated that the Letterman Complex automobile mode share would be between 80 and 85 percent and the vehicle occupancy rate would be 1.2 persons per vehicle without a successful TDM program in place (Letterman Digital Arts Ltd. 2000). These figures translate to between 6,850 and 7,280 weekday daily vehicle trips. With implementation of all TDM measures outlined for Alternative 5 in Table D-12 of the Final EIS (including the proponent's employees occupying 300 units of Presidio housing) it is estimated that the mode split would achieve the required automobile mode share of 70 percent for external trips, 50 percent for internal trips and 1.4 persons per vehicle occupancy rate. These figures translate to 4,910 weekday daily vehicle trips with the successful TDM program in place. The TDM program removes between 28 and 33 percent of the weekday daily vehicle trips that could be generated by Alternative 5.

20 Vehicle Parking on the Site *[3-3, 3-5, 4-2, 5-1, 5-13, 13-1, 15-1, 22-1, 36-14, 41-11, 41-17, 44-35, 44-39, 44-49, 44-51, 44-58, 46-3, 46-4, 46-6, 55-33, 58-2, 61-42, 61-50, 62-2]*

The Presidio Trust is addressing parking needs throughout the park in a Parking Management Study that is underway and is expected to present findings and undergo environmental review in 2000. The purpose of the study is to establish a comprehensive program to accommodate parking needs within the park while balancing the need to minimize the number of parking spaces to be built.

To calculate parking demands, the Trust applied the Draft EIS methodology (see pages 2 through 9 in Wilbur Smith Associates 1999) to the five development alternatives and used standard San Francisco parking demand guidelines (San Francisco Guidelines for Environmental Review). The mode split (70 percent of external and 50 percent of resident employees by automobile) and average automobile occupancy (1.4 persons per automobile) assumptions used in the EIS traffic analysis were used to estimate employee automobiles and each was assigned a parking space. Visitor spaces were assumed to turn over at 6.5 cars/day.

The Trust received comments concerning the uniformity of analysis of the parking demand calculation across all alternatives. In response to these comments, the parking demand calculation for the preferred alternative was revised from the figure provided in the Draft EIS. Specifically, the long-term parking demand calculation for most alternatives was based upon 900,000 gross square feet, whereas for Alternative 5, the demand calculation assumed only 769,000 square feet. When parking demand for Alternative 5 is recalculated using a consistent assumption for gross square footage, Alternative 5 generates a revised parking demand of 1,440 spaces. This revised demand calculation has been incorporated into the Final EIS. The 1,440-space demand can be accommodated within the 1,530 spaces proposed to be constructed under Alternative 5. The difference between the 1,530 spaces proposed and the 1,440-space demand would allow for daily variation in demand and circulation efficiencies.

To ensure that the provision of onsite parking does not encourage driving, the Trust would require that the Digital Arts Center fully participate in the TDM program including mitigation monitoring and other measures specified in mitigation measure TR-8.

A number of commentors were concerned about the impact of the new development within the Letterman Complex on parking availability in the adjacent neighborhoods. Parking supply is sufficient to accommodate demand in the preferred alternative so there would be no significant impact on adjacent neighborhood parking. For alternatives where forecast demand exceeds supply, the Trust would require proponents to institute TDM measures or increase parking supply so that demand is satisfied on the 23-acre site. In addition, the current neighborhood parking sticker program is effective in preventing tenant parking in the neighborhoods. The Trust is coordinating with the city's study of neighborhood parking in Marina and Cow Hollow neighborhoods to ensure that potential concerns are addressed. Further, the Trust's Parking Management Study will contain recommendations to minimize impacts on adjacent neighborhoods of employee and visitor parking within the Letterman Complex. Following input from neighborhood organizations, the Presidio Trust will work with the San Francisco Department of Parking and Traffic to implement and enforce recommendations.

21 *Decision to Develop before Doyle Drive* *[6-4, 10-2, 13-8, 23-67, 23-68, 39-1, 55-41]*

Several commentors suggested that the project should not be developed before Doyle Drive is rebuilt. Because the Presidio Trust is charged by Congress to become financially self-sufficient by 2013, and because development at the Letterman Complex is critical to achieving self-sufficiency, the Trust cannot wait until the Doyle Drive planning process is completed to move forward with work at the Letterman Complex. Planning for reconstruction of Doyle Drive has recently restarted under the direction of the San Francisco County Transportation Authority (SFCTA) in cooperation with Caltrans. The current schedule calls for completion of environmental analysis and documentation in 18 months, which would be June 2001. There currently is no schedule for design or construction, and construction funding is not in place. Consequently, the EIS assumes that the Letterman Complex implementation would occur a number of years prior to reconstruction of Doyle Drive.

The Presidio Trust will continue to coordinate with the SFTCA and Caltrans on the Doyle Drive Study so that the adopted plan for Doyle Drive would be compatible with proposed circulation within the 23-acre site.

The preferred alternative would not preclude previously identified alternatives for Doyle Drive. However, major changes in the current site plan would be required to accommodate the Gorgas Avenue alignment that was identified in prior studies for Doyle Drive. The Gorgas Avenue alignment was never supported by the NPS (see GMPA, page 50) and is unlikely to be supported by the Presidio Trust. However, it appears likely to be considered, at least initially, as an alternative in the upcoming Doyle Drive Project EIS.

22 *Effect on Existing Intersections, Traffic Circulation, and Historic Roads* *[6-3, 13-8 through 13-11, 13-4, 44-52, 49-5, 61-68, 61-70, 61-71, 61-73]*

Commentors asked what impacts the proposed alternatives would have on the existing roads, intersections and traffic circulation in the Letterman Complex. Commentors also raised concerns that awkward or difficult intersections or roadway changes were evident in Alternatives 2 through 5. In an attempt to address this, additional text has been added to Sections 4.2.8.5, 4.3.8.5, and 4.4.8.5 (Effects Due to Intersection and Roadway Improvements) to discuss the effect due to intersections and roadway improvements.

Questions have been raised about road networks shown in the alternatives and how these would impact the historic streetscapes at the Letterman Complex. The historic layout of the Letterman Complex street system is considered to be an important characteristic of the site's overall cultural landscape, and would be retained and rehabilitated as much as possible while meeting contemporary needs. Individual road corridors are identified as contributing to the National Historic Landmark and would be retained without changes that would adversely affect their historic character. Comments about potentially awkward intersections, interference with existing traffic and parking patterns, and their impact on existing tenants of the Letterman Complex are noted. One of the results of the design review process would be to create an efficient road network for the entire 60-acre complex. The effects that the preferred alternative's design would have on the historic streetscapes and existing traffic patterns of Torney, General Kennedy, and O'Reilly avenues and Edie Road would be duly observed to minimize adverse effects both on the historic resource and on the circulation of traffic.

One commentor asked that additional analysis be performed to address each intersection shown in each alternative, in addition to those analyzed in the EIS (as shown in Figures 15, 16, and 17). The intersections analyzed in the EIS are those most likely to be affected by traffic generated by proposed development at the Letterman Complex. Other roadways and intersections internal to the 23-acre site vary by alternative and are described in each alternative. They have not been analyzed within the EIS because they are not designed to the level required for detailed traffic impact analysis (e.g., number of traffic lanes, turn pockets, intersection control). The detailed design of roads and intersections which result from this undertaking would be reviewed and approved by the Presidio Trust as part of the design review process to ensure that an adequate level of service would be maintained .

It has also been noted that traffic generated by construction vehicles could have an adverse effect on the surrounding area during construction. Proposed routes for construction vehicles are shown in Figure 19 and discussed in Section 4.1.7.6 of the EIS. A construction traffic management plan as discussed in mitigation measure TR-5, *Construction Traffic Management Plan* would be developed to further specify routes, times of operation, and other factors to mitigate construction impacts on neighbors both inside and outside the park.

23 Effect on Historic Setting *[13-9 through 13-13, 33-4, 33-9, 44-26, 44-29, 44-30, 44-32, 44-52, 49-5, 61-15, 61-26, 61-29, 61-68, 61-70,61-71,61-73]*

Several commentors have questioned the effects that Alternatives 2 through 5 would have on the existing historic setting of the Letterman Complex to the north and west of the 23-acre site, and their effects on the residential neighborhood to the east. In an attempt to address this, additional analysis has been added in Sections 4.1.8.1 through 4.5.8.1 to analyze each alternative's effect on the historic setting.

Commentors have noted that Alternatives 2 through 5 would construct 900,000 square feet of construction on the 23-acre site, and suggest this would create an adverse effect on the National Historic Landmark setting. The analysis in the EIS has determined that through careful design and siting, the new construction would actually enhance the historic setting. It would employ a contextual approach to architecture and site planning to create a development more compatible with the historic Letterman Complex than the existing LAMC and LAIR. In contrast to the current centralized building layout, replacement buildings and landscaped areas would be spread across the 23 acres in a layout that is closer to historic patterns of development at the Letterman Complex. By removing the 10-story, 163-foot Letterman tower and restricting replacement construction to 60 feet in height, and by providing view and circulation corridors through the site, the Palace of Fine Arts would once again be a dominant feature for the site, and views into the site from surrounding neighborhoods would be improved. By creating a circulation network that allows people to move through and across the site in both the east/west and the north/south direction, better connections to the rest of the 60-acre complex would be achieved, thus unifying what is currently a disjointed site. Restoring visual order to the site and reducing the now more than 8 acres of surface parking would improve the scenic qualities of the site. If the existing concrete structures are removed and replaced by buildings that use a palette of materials derived from precedents found elsewhere in the Presidio, the new buildings would be more compatible with the National Historic Landmark district than the current LAMC/LAIR facilities.

Impact on O'Reilly Avenue – It has been pointed out that most of the alternatives shown in the EIS do not contain an O'Reilly Commons as recommended in the Planning Guidelines, and this may create an adverse effect on the historic setting. To address this, additional text has been added in Sections 4.1.8 through 4.5.8 (Cultural Resources) to analyze the effects of new construction for each alternative. The Planning Guidelines introduced the concept of the O'Reilly Commons as a buffer zone between new construction and the row of adjacent historic structures. Additional text has been added to the Planning Guidelines to define the desired width of the O'Reilly Commons. The objective behind the buffer zone is to minimize any adverse impact that new construction might have on the historic structures on O'Reilly Avenue. There are several ways to ensure that new construction would be compatible with these historic buildings, and the buffer zone is one of several solutions that can be employed to achieve this. Compatible massing and modulation of new building forms along O'Reilly Avenue, as well as the permeability of this built edge, are issues that would be carefully reviewed during design development to ensure consistency with the objectives of the Planning Guidelines. Connections, both visual and physical, from the adjacent historic hospital complex to the 23-acre site are an important objective for integrating new replacement construction into the entire 60-acre complex. Text has also been provided in Sections 4.1.8 through 4.5.8 (Cultural Resources) to provide additional analyses of how each alternative establishes important visual and physical connections, and areas have been identified that would be further considered during design review.

Impact on Gorgas Avenue – Alternatives 1 through 5 include reconfigured Richardson Avenue/Gorgas Avenue intersections that allow northbound and southbound Richardson Avenue traffic to make a left turn onto Gorgas Avenue, and allows left turns from Gorgas Avenue onto Richardson Avenue for northbound traffic at a new intersection created between buildings 1152 and 1160. The proposed one-way exit from Gorgas Avenue would be located between existing historic buildings. However, the proposed break in the row of historic buildings to accommodate this new road would be strategically located between two similar but different clusters of historic buildings. The cluster closest to the Gorgas Avenue Gate, buildings 1151 and 1152, date from World War II, while the warehouse structures (1160s) date from World War I. There is also a break in the streetscape's rhythm between these two clusters.

The effects of proposed intersection improvements on adjacent historic properties, as well as the National Historic Landmark district, are analyzed in Sections 4.1.8.3, 4.2.8.5 through 4.5.8.5, and 4.6.8.3 of the EIS. For Alternatives 2 through 5, the EIS concluded that although there would be an adverse effect on the individual properties, there would not be an adverse effect on the overall streetscape or National Historic Landmark district. The introduction of a passage between the two clusters was determined not to be a significant impact on the overall industrial streetscape setting. In addition to the analysis included in the EIS, a Project Study Report would be prepared by Caltrans for the redesign of these intersections and any further assessment of effects triggered by design refinement would be conducted as part of that process.

Concern was expressed that traffic along Gorgas Avenue would increase over the current levels and that there would be impacts on users of these historic buildings due to new traffic. The reconfigured eastern intersection at the Gorgas Avenue Gate would be no closer to building 1151 than the current exit from Richardson Avenue is to this building and would thus not significantly change conditions. Furthermore, this would not impact the buildings but may restrict pedestrian access to the YMCA from areas south of Gorgas Avenue. The Trust

would work with the YMCA and the selected development team to design safe pedestrian access across Gorgas Avenue as part of the site planning process.

Commentors pointed out that several of the alternatives did not construct a strong built edge along Gorgas Avenue as recommended in the Planning Guidelines (Figure B-19). Changes have been made to the figure to clarify the extent to which a strong built edge is desirable. The new graphic shows that a strong built edge would be recommended on portions of Gorgas Avenue, but not as a continuous edge. It is felt that respecting the industrial character of the streetscape, and providing uses that are active and urban as recommended in the Planning Guidelines, can be achieved without creating a continuous built edge.

24 *Impact on Visual Resources [23-70, 33-9, 44-29, 44-30, 44-39, 44-45, 47-8, 49-5, 61-4, 61-15, 61-16, 61-63, 61-74]*

Several commentors raised concerns about adverse impacts on scenic views. The EIS includes analysis and discussions of the visual impacts of the project. The EIS discusses and analyzes the unique characteristics of the 23-acre site in Section X, Visual Resources, in Appendix A of the EIS. That discussion notes that, as seen from the Lombard Gate, the 23-acre site, as it currently exists, is not high in scenic quality, being dominated by a 8-acre parking lot and two non-historic buildings (LAMC and LAIR) that contrast sharply with and dominate their surroundings. Both discussions determine that new adverse visual impacts may result due to replacement construction, and recommend additional analysis, design guidelines and building height restrictions to help minimize these impacts. The recommended additional analyses have been prepared in accordance with the scope decided upon in the tiering analysis in Appendix A as recommended in the GMPA EIS, and are provided in Sections 4.1.8.4, 4.2.8.6 through 4.5.8.6, and 4.6.8.4 (Visual Impacts) of the EIS. Furthermore, Design Guidelines that incorporate the Final Planning Guidelines in this FEIS and that have been made a requirement of the Programmatic Agreement (see Appendix F of the Final EIS), would further guide the architectural design of the preferred alternative. Mitigation measure VR-2, *Height of Replacement Construction*, in Section 4 of the EIS would restrict the height of replacement construction to that of nearby structures with a maximum allowable height not to exceed 60 feet. Finally, as discussed in the text of the Final EIS and in master response 23, re-establishment and enhancement of historic view corridors would have a beneficial effect on the visual and historic setting.

Several commentors requested that visual simulations be included in the Final EIS for each of the alternatives to depict before and after conditions and to aid in the analysis on the visual quality and scenic resources. Visual simulations of the various alternatives are not included in the Final EIS, as they are not required under NEPA. The use of appropriate graphics, while sometimes helpful, is not mandatory (CEQ NEPA Regulations Section 1502.8). Here, however, graphics to illustrate the visual impacts for each alternative have been added to the Final EIS in Section 4, Environmental Consequences (Figures 20 through 24), as well as more detailed analysis to address the concerns raised. It is anticipated that visual simulations would be utilized during the planning and design process to ensure that the project's massing and scale would be compatible with the historic and visual setting. The recommendation to include photographs of the historic view corridors, both before and after implementation of each alternative, is not included in this Final EIS, although text describing the historic view corridors is provided in Section 4 (Environmental Consequences), as mentioned above. This type of visual

analysis (visual simulations and comparative photographs) would be considered in the subsequent planning and design review process to ensure the proposed project's visual compatibility with the historic setting and the Planning Guidelines.

With regard to comments about impacts of the preferred alternative on scenic and historic view corridors, Section 4.5.8.6 has been added, which analyzes the impact this alternative has on views, and Figure 24 has been added to illustrate this discussion. The analysis concludes that direct east-west views across from O'Reilly Avenue would be blocked at Torney Avenue and Edie Road, but the existing historic view corridor at Thornburg Road would be retained. Views to O'Reilly Avenue would not be obstructed from other points within the site, such as from building 558. North-facing views toward the Palace of Fine Arts would be created at two points between buildings where new view corridors would be created.

25 *Impact on Visitor Experience and Public Access [13-13, 16-1, 18-5, 22-2, 23-44, 23-45, 23-79, 24-2, 24-3, 25-2 through 25-4, 33-2, 33-3, 33-8, 33-11, 44-17 through 44-22, 44-36, 49-7, 65-9]*

Several commentors expressed concern that the effects of the proposed undertaking on park visitors had not been adequately analyzed. In response to this concern, new sections have been added to the Final EIS to address this issue. Please refer to Sections 2.3.3 through 2.8.3 (Activities and Programs), Section 3.10.6 (Visitor Experience) within the Affected Environment, and Sections 4.1.8.5, 4.2.8.7 through 4.5.8.7, and 4.6.8.5 (Effect on Visitor Experience) for additional analyses on the subject. The analyses conclude that each of the alternatives would have a beneficial effect on the visitor experience. For example, the preferred alternative's 7-acre Great Lawn would be a key public amenity for both active and passive recreation in a campus-like setting that would include a water feature, promenade, and a public café, two coffee bars, and restroom facilities nearby. A group of screening/meeting rooms at the main visitor entrance would be offered for community use. A digital arts training institute for study in computer graphics, an internship program for college students, and an educational program for middle school and high school students would also be provided. In addition, an outreach coordinator would work with other Presidio tenants to develop collaborative and joint service programs.

The 23-acre site would be an integral part of the larger Letterman Complex, which would serve as one of many areas throughout the Presidio which would "tell the story" of the Presidio in support of the five interpretive themes identified in the GMPA. An overall beneficial effect on the visitor experience would occur through actions such as the rehabilitation of building 558 as a visitor information center, the introduction of three information/orientation kiosks, the incorporation of interpretive information about the complex in public lobby spaces, and interpretive displays incorporated into the landscape at key spots. These improvements would increase public access and visitor opportunities considerably over what exists today for visitors.

Some commentors have asked how the preferred alternative would meet the Planning Guidelines recommendation to "showcase and interpret" the history of the Letterman Complex and relate to other Presidio themes. The proponent of the preferred alternative, as a provider of digital arts and other technologies, has unique skills which would be put to use by the NPS and the Trust, especially by drawing on their "story-telling" abilities, to develop interpretive opportunities.

Several commentors state that the preferred alternative offers few public amenities, and does not provide an adequately prominent public service component. Others asserted that the preferred alternative offers fewer public amenities than some of the other alternatives. It should be noted that in all alternatives, the primary uses of the buildings are institutional, office and residential, which are not by their nature public. In the case of Alternative 1, its main function is a laboratory, whose facilities would be used predominantly by staff, visiting researchers, and special program participants. Several commentors have pointed out that Alternatives 2, 3 and 4, as mixed-use developments, include retail, institutional, and residential uses that would attract a broader mix of people to the 23-acre site. The preferred alternative, like the GMPA Alternative, is not a mixed-use development, and would attract a single-purpose user group. However, the preferred alternative would offer public amenities and services as discussed above.

Some commentors have asked about the policy of public access to buildings under the preferred alternative while others have stated that parkland is being closed off to the public. In fact, under the preferred alternative, the policy for public access to buildings would be the same policy that applies to all Presidio tenants. Public areas, such as building lobbies or spaces containing public amenities, would be open to the public. Spaces intended for occupancy by employees and residential units would not be public. Current Presidio tenants, as well as those who would occupy the buildings under the preferred alternative, are entitled to privacy in their business areas. On the other hand, the preferred alternative proposal would provide a significant public exterior space (the 7-acre Great Lawn), which is a substantial increase over present conditions. It is expected that employees of the digital arts center, other park tenants, area neighbors, and park visitors would use this space. Improving pedestrian access to the Great Lawn from the adjacent historic hospital complex and the rest of the Presidio would be addressed during the design development to make it easier to enter the Great Lawn from its western edge.

The impacts that this undertaking would have on pedestrians, hikers and bicyclists has been questioned by several commentors. To help address this, Sections 4.1.7.4 through 4.5.7.4 (Impacts on Pedestrian and Bicycle Facilities) within the Final EIS include additional text to analyze each alternative's site circulation. This is also now addressed in Appendix B, Planning Guidelines, Section 3.6.2.B, Pedestrian, Bicycle and Vehicular Access. Suggested circulation routes show a clear bicycle and pedestrian network throughout the Letterman Complex. In addition to this section, frequent references are made in the Planning Guidelines to a "pedestrian-friendly" environment. The exact layout of bike and pedestrian circulation routes, and the development of pedestrian-oriented areas, would be further evaluated as the preferred alternative undergoes design review.

INDIVIDUALS WHO SUBMITTED THE ELECTRONIC FORM LETTER ORIGINALLY PREPARED BY THE NATIONAL PARKS AND CONSERVATION ASSOCIATION (LISTED IN ORDER OF DATE RECEIVED)

1. Robert Rutkowski
2. David A. Wilcox, Jr.
3. Mr. & Mrs. R. C. Jones
4. James Schinnerer
5. Dr. Andrew C. Millard
6. Catha J. Loomis
7. Abby Winston
8. Fern and Daniel Riley and Family
9. Elizabeth Pape
10. Jesse Counterman
11. Beth Carman
12. Joan Gambill
13. Constantina Economou
14. Richard Spotts
15. Miranda Lovelace
16. Marsha W. Van Every
17. Jeffrey L. Kunkel
18. Lisa C. Price and Julie Brandlen
19. Gerald Orcholoski
20. George Bond
21. Mark Swoiskin, M.D.
22. Joyce Silvernail
23. Naseer Mohamed
24. Greg Raschke
25. Robin Johnson
26. Bill Parish
27. Jennifer Abel
28. Todd J. Marse
29. Steven Aderhold
30. Cheryl L. Vallone
31. Jessea Greenman
32. Clyde Everton
33. Ingrid Nagy
34. Tina Horowitz
35. Seneca J. Klassen
36. Jennifer Brightman
37. Alicia C. Ushijima
38. Craig A. Hibberd
39. Lisa Gartland, Ph.D.
40. Janet Michaelson
41. Sara Ellis
42. Erin Wilson
43. Kevin Starr, MD
44. Joshua Karliner
45. Robert K. Zinn
46. Philippe Leupin
47. Ms. Barbara Blackie
48. Liane Salgado
49. John Sniegocki
50. Cari Morin
51. Scott Bonner
52. Ms. Misako E. Hill
53. Tammy Tsao Tsao
54. Brian Williams
55. Lou Meyer
56. Jonathan Pearlman
57. Mr. Stefan A. Lasiewski
58. Jesse Osmer
59. Amy Stoddard
60. Michael Leppitsch
61. Mrs. Kristianna T. Hamann
62. Ms. Giovanna M. Chelser
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93. Matt Harray
94. George Elfie Ballis
95. Laura Lane
96. Aundrea Margason
97. Donna Chelman
98. Jennifer Bartholomew
99. Elizabeth Hopp
100. David A. Wilcox, Jr.

Letter 1

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TRANSPORTATION PLANNERS LTD.

P. O. Box 1145 / 865 Leff Street
San Luis Obispo, CA 93406 - 1145
Tel / Fax (805) 545 - 5919
www.slonet.org/~canderso/jud.html

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1 May 1999

BY FAX,
Hardcopy will follow from Interland

Presidio Trust
NEPA Compliance Coordinator
34 Graham Street
P.O. Box 29052
San Francisco, California 94129

Re: DEIS Traffic Analysis for Presidio Village

To Whom It May Concern,

This letter is to comment on the Traffic and Transportation section of the DEIS for the Letterman Complex, especially as it relates to Presidio Village (Alternative 4). As discussed herein, I believe that the DEIS relies on erroneous assumptions to reach incorrect conclusions, as follows:

1. The DEIS improperly applied the ITE land use definitions by characterizing the multi-media activities at Presidio Village as a "General Office Building" rather than as a "Research and Development Complex."

2. The DEIS improperly used residential trip generation rates for single-family homes and family apartments rather than for one-bedroom and studio apartments.

3. The DEIS omitted several TDM measures from the Presidio Village project description.

4. The projected modal splits for Presidio Village failed to utilize available information regarding CNET employee travel patterns.

1

TRIP GENERATION

1. The DEIS applied the incorrect ITE land use category to the multi-media activities at Presidio Village.

In Table D-1 of the DEIS, the multi-media activities at Presidio Village are characterized as "office" (ITE Land Use category 710). By comparison, the multi-media activities of the LNR proposal (Alternative 2) and the Lucas proposal (Alternative 5) are characterized as "University/R&D" (ITE Land Use category 760).

There is no supportable basis for distinguishing between the multi-media activities of Presidio Village and the multi-media activities of Alternatives 2 and 5. In *Institute of Transportation Engineers Trip Generation (5th Edition)*, ITE defines a "Research and Development Center (Land Use 760)" as "facilities or groups of facilities devoted nearly exclusively to research and development activities. They may also contain offices and light fabrication areas." All three alternatives clearly meet this definition. Alternative 2 is described as a "village campus for health care, education, offices, residential uses, and an inn," (page 21), and Presidio Village is similarly described as a "village of offices, institutions, housing, and support services" (page 31). Like the various Lucas companies, CNET is "engaged in research, development and production of digital arts and technologies" (see page 31). Indeed, page 27 of the DEIS notes that CNET is "devoted to Internet media, communications, and education." More generally, both entities are involved in inventive, educational, and commercial activities that are both technology-driven and design-related. Both have worker densities of 330 square feet per employee. 1-1

By comparison, the definition of General Office Building (Land Use 710) is distinctly different from the Presidio Village concept: "A general office building ... or buildings may contain a mixture of tenants including professional services, insurance companies, insurance brokers, and tenant services such as a band or savings and loan, a restaurant or cafeteria, and service retail facilities. Nearly all of the buildings surveyed were in suburban locations." None of these examples address the multimedia R & D activities anticipated at Presidio Village, which is clearly an urban, not suburban development.

The application of the incorrect ITE land use category to Presidio Village artificially inflated project person-trip rates for those multi-media activities by more than 58%. While the DEIS applied a person-trip rate of 11.42 trips per 1,000 square feet for Alternatives 2 and 5, it improperly applied a person-trip rate of 18.1 trips per 1,000 square feet to Alternative 4. We recommend that Table D-1 be amended to accurately characterize the multi-media activities of Alternative 4 as "R&D" rather than as "Office."

2. The DEIS improperly used trip generation rates for single-family homes and family apartment rather than studios and one-bedroom apartments.

As noted in Table D-1, footnote 4, the DEIS assumed that all housing units at Presidio Village will be either single-family homes or 2+ bedroom multi-unit apartments with a person-trip rate of 10.0 trips per unit. This assumption is incorrect. 75% of the housing units at Presidio Village will be one-bedroom and studio apartments with a trip generation rate of only 7.5 trips per unit; only 25% of the units will be 2 or 2+ bedroom units. The weighted average for Presidio Village is 8.12 trips/unit, as follows:

(75% x 7.5 trips) + (25% x 10.0 trips) = 8.12 trips

Based upon the comments above, we calculate daily person trip generation for Presidio Village as follows: 1-2

R&D:	475,000 sf x 11.42 trips per thousand sf	= 5,424
Housing:	459 units x 8.12 trips per unit	= 3,727
Total		= 9,151

According to page D-2 of the DEIS, approximately 15% of these trips are assumed to be internal and 85% external. However, we believe that a much more realistic trip distribution for a large live/work project of this size would be 25% internal trips and 75% external trips, particularly where, as here, 25% of CNET's employees have indicated their desire to live within Presidio Village. Actual external person trips for Presidio Village, then, is calculated to be 6,863 trips (9,151 trips x 0.75). We suggest that Table D-2 and other sections of the DEIS be edited accordingly.

3. The DEIS transportation report incorrectly omitted several TDM measures from the Presidio Village project description.

Section 4.4.7.6 (Impacts of TDM Measures) incorrectly states that Presidio Village will include just 10 TDM measures in addition to the 9 TDM measures listed on page D-4. The Presidio Village proposal actually incorporates 37 of the 38 possible TDM measures listed in Table 2.2. of the DEIS transportation report. 1-3
These measures go beyond the ones suggested in *Transportation Management Programs in Greater Downtown* of the San Francisco Department of City Planning. We suggest that Section 4.4.7.6 be replaced with the following text:

"Alternative 4 incorporates 37 of the 38 possible TDM measures identified by the Presidio Trust to encourage non-automobile use and minimize parking demand. In addition to the TDM plan elements described under Alternative 1, the following TDM measures were developed as part of Alternative 4:

- *Allocation of a portion of the site for workforce housing*
- *A project shuttle van to BART, MUNI, the ferry, downtown, and the Main Post*
- *Providing monetary incentives to not drive*
- *Guaranteed ride-home program*
- *Midday transit pass availability*
- *Car-sharing*
- *Bicycle-sharing*
- *Pedestrian and bicyclist amenities such as onsite showers and changing rooms*
- *Class II bicycle lanes*
- *Preferential carpool/vanpool parking*
- *Time limits for short-term parking supply*
- *Flex-time policies*
- *Telecommuting policies*
- *Web page*
- *TMA membership*
- *Brokerage of services*
- *Rideshare incentives*
- *Carpool/vanpool matching*
- *Vanpool program* 1-3
- *Promote transportation fairs*
- *New employee orientation*
- *On-site amenities and support services*
- *Bicycle and pedestrian routes connected*

These TDM measures would support transit use and discourage single-occupant auto use by employees by providing incentives for carpooling and not driving (e.g. preferential carpool and vanpool parking, constraining parking supply, guaranteed-ride-home program, and providing monetary incentives). The project shuttle van to the Main Post, BART, MUNI, the ferry, and downtown San Francisco would encourage transit use and reduce the number of cars to the Presidio without being dependent upon the creation of a Presidio-wide shuttle system. Bicycle and pedestrian travel would be encouraged through the provision of on-site pedestrian and bicycle facilities (including Class II bicycle lanes, sidewalks, and on-site showers and lockers), midday transit passes, and bicycle sharing. Flextime, telecommuting, and guaranteed-ride-home programs would allow employees to adjust their work schedules as necessary. The car-sharing program would provide employees and residents the flexibility of using transit, bicycling, or walking, while having a vehicle available when needed. The inclusion of housing within walking distance of the job site and on-site amenities like ATMs, restaurants and retail facilities would further reduce the number of vehicle trips to the site and parking demand."

MODAL SPLIT

4. The projected modal split for Presidio Village failed to utilize available information about CNET employee travel patterns and instead erroneously relied on generalized projections in the GMPA EIS.

The DEIS utilized modal split information from the GMPA EIS and assumed that 70% of Presidio Village person trips will be by auto (see page D-3). While this modal split may be appropriate for residential uses, this generalized assumption is not appropriate for the R&D uses in light of the information presently available regarding CNET's current employee travel patterns.

A survey of CNET employees indicates that no more than 25% of CNET's employees presently drive to work; 75% walk, bicycle, or take the bus to work. Moreover, 75% of CNET's workers presently live in San Francisco.

Work trips normally constitute 40% of daily travel, while other trips make up the remaining 60% of daily travel. Assuming that 25% of Presidio Village work trips and 70% of other trips are done by car, we conclude that 52% of all trips will be by car. This is based on the following calculation of the weighted average: 1-4

$$(25\% \times 0.4) + (70\% \times 0.6) = 52\%$$

Based on these factors, and the factor 0.75 of paragraph 2 for external trips, we suggest Table D-2 "External Trip Generation" be edited as follows, and other sections of the DEIS accordingly:

	Person-Trips				*Vehicle*
Alternative	*Auto*	*Transit*	*Walk/Bicycle*	*Total*	*Trips*
Alternative 4	*4,060*	*1,400*	*1,400*	*6,860*	*2,900*

It should be noted that these numbers are rounded.

Thank you for your consideration of these comments. If you have any questions or would like more information, please do not hesitate to contact me personally.

Sincerely yours,
EUGENE JUD, FITE

CC: Dick Tilles, Wilbur Smith Ass.
Shorenstein, Interland

Responses to Comments in Letter 1

1 - 1

Thank you for your comments. The primary tenant, an Internet information network company which is proposed as part of Alternative 4, would account for 200,000 of the 525,000 gross square feet (gsf) dedicated to office uses. If the Research and Development trip generation rates were used for the Internet company component, the daily external vehicle trips generated by Alternative 4 would be reduced by 570 daily vehicle trips, or 10 percent of the 5,710 trips noted in the Draft EIS. As suggested by the commentor, the text and tables of the Final EIS have been amended to more accurately reflect the multi-media activities of Alternative 4. As a result of this amendment, the total traffic that would be generated by Alternative 4 was reduced from 6,450 to 5,810 daily vehicle trips, and from 760 to 710 p.m. peak-hour vehicle trips (see Table 16). In addition, the projected parking demand for Alternative 4 was reduced from 1,200 to 1,160 parking spaces. Although the revised trip generation rates would generate less p.m. peak-hour traffic at the study intersections, no levels of service were changed, and no significant impacts were eliminated.

1 - 2

Specific data on the number of studio, one-bedroom and two-bedroom units were not provided by the development teams, and therefore as a conservative assumption, the residential trip generation rate for 2-plus bedrooms/ single-family homes was applied to Alternatives 2 and 4. The average size of the dwelling unit was reviewed to determine the applicability of the two-bedroom rate. For example, under Alternative 4, the average size per dwelling units is 822 to 975 feet (400 to 450 dwellings units with a total of 370,000 square feet), which in San Francisco is typically a two-bedroom unit.

1 - 3

The EIS preparers reviewed the TDM program presented in the proposal for all alternatives. In response to the comment, Sections 4.2.7.6 and 4.4.7.6 of the EIS were amended to include the revised listing.

1 - 4

The Draft EIS used an analysis primarily based on proposed uses rather than specific tenant characteristics for a number of reasons:

- To account for alternatives where subtenants were not specified.
- To allow for subtenant substitutions, within the same general land use category, that could occur prior to the 2010 analysis year.
- To account for the fact that even where specific subtenants were identified, current employee transportation mode and residence data were not usually made available to our analysts.
- To recognize that transportation characteristics are not necessarily tied to a specific tenant but to the current and future transportation characteristics of the Presidio itself.

For all the above reasons, but particularly the last, CNET's current modal characteristics were not used. CNET's current office is located in a densely developed section of Telegraph Hill where parking is extremely limited and use of non-automobile modes is essential. While the Presidio Trust will institute a Transportation

Demand Management program that would reduce the proportion of automobile trips to the park, it would be unrealistic to base the Draft EIS traffic analysis on the 25 percent automobile mode share that CNET is reported to achieve at its current location.

Letter 2

PRESIDIO•VILLAGE

RECEIVED

3 May 1999

NEPA Compliance Coordinator
Attn. Letterman Complex
Presidio Trust
34 Graham Street
P.P Box 29052
San Francisco, California 94129

Via UPS Next-Day

Re: Comments on Letterman DEIS

Dear Coordinator,

By this letter we herewith transmit the comments of the Shorenstein/ Interland team regarding Section 4.4 of the Draft Environmental Impact Statement (DEIS) for the Letterman Complex. Our comments on other sections of the DEIS will be submitted under separate cover.

4.4.1 CONSISTENCY WITH APPROVED PLANS

4.4.1.2 Presidio General Management Plan Amendment

Comment: The DEIS fails to note how the Presidio Visitors' Center, the Women's Technology Center, the San Francisco Historical Society, and the California Indian Museum and Cultural Center will support the GMPA goals. A detailed letter reviewing how each Presidio Village tenant fulfills the goals and objectives of the Trust is attached hereto. We suggest that the text of 4.4.1 be edited as follows (inserted text indicated in italics): 2-1

"Alternative 4's anchor tenant, a media/Internet programming company, *and the women's small business hi-tech* would be consistent with the GMPA's general objective to provide for appropriate uses of the Presidio, particularly those that involve the arts, education, research, innovation, and communication. *These uses* would complement park-related programs and activities in the areas of Internet-based research and

NEPA Compliance Coordinator
The Presidio Trust

May 3, 1999

development and telecommunications. In addition, *the women's small business hi-tech incubator would contribute towards the Trust's goals by promoting socio-economic diversity."*

"*The visitors' center*, the international environmental organization, the national foundation supporting national parks, *and the museum and cultural center* would also be consistent with the GMPA's general objective to provide for appropriate uses of the Presidio, particularly those that involve stewardship and sustainability, community service and restoration, research, education, and communication. They would also advance the GMPA's specific objective to provide research, education and training in the principles and practices of resource stewardship within and beyond park boundaries. *In addition, the international environmental organization and the museum and cultural center would contribute to cross-cultural and international cooperation.*" 2-1

"The branch library of the California state library system *and the local historical society* would similarly be consistent with the GMPA's general objective to provide for appropriate uses of the Presidio, particularly uses that involve education, research, communication, *and stewardship of resources. They* would also promote the GMPA's Presidio-wide principles regarding interpretation and education, as well as collection preservation."

4.4.2 SOLID WASTE

4.4.2.1 ***Disposal of Demolition Debris***: The DEIS assumes that all demolition materials will be disposed of off-site and that no on-site or off-site recycling will occur. The DEIS states that Presidio Village will generate 80,000 tons of concrete debris.

Comment: These assumptions are incorrect. According to Joe Urrutia of Swinerton & Walberg, general contractors for Presidio Village, approximately 75% of concrete debris will be crushed and recycled on-site for parking areas and roadways. We suggest that the text of 4.4.2.1 be edited as follows: 2-2

"Alternative 4 would generate 80,000 tons of construction debris. *The project contractor estimates that approximately 75% of this debris (60,000 tons) will be crushed and recycled on-site for parking areas and roadways. Approximately 20,000 tons of debris would remain for removal off-site.*

NEPA Compliance Coordinator
The Presidio Trust

May 3, 1999

4.4.4 SCHOOLS

4.4.4.1 ***Impact on Capacity of Existing or New School Sites***: The DEIS assumes that the average household site at Presidio Village will be 3.2 persons per household (Table 12), and that Presidio Village will therefore generate 273 school children.

Comment: Only 25% of the residential units at Presidio Village will be two-bedroom units or larger capable of accommodating 3.2 residents; 75% of the residential units will be studios and one-bedroom units that cannot accommodate 3.2 person. We therefore suggest that the residential population of Presidio Village be recalculated based on the actual unit mix to reflect the significantly lower demand for school facilities that could be generated. 2-3

4.4.5 HOUSING

4.4.5.1 ***Increase in Housing Demand***: The DEIS states that Presidio Village includes "400 to 450 units to be constructed on site." 2-4

Comment: Presidio Village will provide 459 units of workforce housing. We suggest that the text be amended accordingly.

4.4.6 MEDICAL RESEARCH

4.4.6.1 ***Impact on Medical Research***: The DEIS states that "implementation of [Presidio Village] would preclude the use of the site for medical, life science and/or earth science research."

Comment: The DEIS defines the Updated Presidio GMPA Alternative for a Science and Education Center as follows: "The Letterman Complex would continue to be used to nurture ideas and support research and actions to improve human *and environmental health*. Life *and earth science programs* would be explored to better understand and manage the interdependence of health and the environment" (DEIS page 18, Sect. 2.1.1, emphasis added). 2-5

Presidio Village includes numerous tenants dedicated to environmental health and earth sciences. We suggest that 4.4.6.1 be replaced with the following text and the remainder of this section edited accordingly:

NEPA Compliance Coordinator
The Presidio Trust

May 3, 1999

"Many Presidio Village tenants are involved in research and actions to improve environmental health and explore earth sciences, including Conservation International, the National Park Foundation, and the Indian Museum and Cultural Center. Through programs encouraging public participation, as well as lectures, displays and interactive exhibits, visitors would learn about the scientific research that is underway and its contribution to society. Thus, the alternative would have a positive impact on medical, life science and/or earth research by provided needed research and education space." 2-5

4.4.7 TRAFFIC AND TRANSPORTATION SYSTEMS

Comment: Comments on the traffic and transportation systems analysis for Presidio Village will be provided under separate cover to The Trust from Eugene Jud, FITE. Dr. Jud's report will detail the following:

- The DEIS improperly applied the ITE land use definitions by characterizing the multi-media activities at Presidio Village as "General Office Building" rather than as a "Research and Development Complex." 2-6
- Although 75% of the housing units at Presidio Village will be studios and one-bedroom apartments, the DEIS improperly used residential trip generation rates for single-family homes and large family apartments.
- THE DEIS omitted several TDM measures from the Presidio Village project description.
- The projected modal splits for Presidio Village failed to utilize available information regarding CNET's employee travel patterns.

4.4.9 AIR QUALITY

4.4.9.1 ***Short-Term Demolition/Construction Impacts***: The DEIS analysis of construction-related air quality effects is based upon the assumptions that (1) all demolition debris will be disposed of off-site and that no recycling will occur, and (2) the project will contain 525,000 square feet of office space. 2-7

Comment: As noted above, these assumptions are incorrect. We suggest that 4.4.9.1 be replaced as follows, the level of air emissions recalculated, and the remainder of this section edited accordingly:

NEPA Compliance Coordinator
The Presidio Trust

May 3, 1999

"Alternative 4 would generate 80,000 tons of construction debris. The project contractor estimates that approximately 75% of this debris (60,000 tons) will be crushed and recycled on-site for parking areas and roadways. Approximately 20,000 tons of debris would remain for removal off-site." 2-7

4.4.9.2 ***Long-Term Regional Operation Impacts***: The DEIS states that Presidio Village would generate 99 lb./day of NOx.

Comment: In calculating air emissions, the DEIS erroneously omits the TDM measures that are integral to the Presidio Village proposal, thereby utilizing a legally faulty project description. Moreover, the DEIS analysis is based upon traffic assumptions which do not take into account actual CNET traffic patterns or the operation of a free Presidio Village shuttle van. We suggest 4.4.9.2 be edited to address air emissions from Presidio Village *including* the TDM measures, and taking into account the comments submitted separately by Dr. Jud regarding trip generation and modal splits. 2-8

4.4.11 UNAVOIDABLE ADVERSE EFFECTS

Air Quality: The DEIS states that "NOx emissions would be significant based on the BAAQMD's significance thresholds for NOx of 80 pounds/ day." 2-9

Comment: This section may need to be amended to reflect changes to 4.4.9 above.

Thank you for your consideration of these comments. If you have any questions or would like more information, please feel free to contact either of us.

SHORENSTEIN, LP

Thomas W. Hart
Vice President

INTERLAND CORPORATION

Richard C. Reisman, AIA
Vice President

Responses to Comments in Letter 2

2 - 1

Thank you for your letter. The text has been modified to address how the various tenants of Alternative 4 that were not previously identified in Section 4.4.1.2 would be consistent with the General Objectives of the GMPA.

2 - 2

As indicated in Section 4.1.2 of the Draft EIS and Final EIS, for purposes of the impact assessment only, the assumptions reflected a worst-case (largest quantity) analysis. However, it is understood that much of the concrete would be crushed and recycled onsite to divert as much material from the waste stream as technically and financially possible. Mitigation measure SW-1, *Waste Reduction Goals* would require that the project divert at least 50 percent of the waste stream due to demolition within the Letterman Complex. In addition to concrete, these materials would include wood, brick, ceramic tile, gypsum, paper, glass, plastics, asphalt, various roofing materials, and mixed waste.

2 - 3

The schools analysis contained in the Draft and Final EIS is based on the same set of assumptions for all alternatives to avoid underestimating the worst impacts on public schools. The estimates reflect the number of schoolchildren currently living in Presidio housing, the best information available at this time, and are provided for comparative purposes only.

2 - 4

The housing analysis for Alternative 4 represents the impacts that would occur under the Presidio Village concept. The text has not been amended as recommended by the commentor.

2 - 5

The medical research analysis in the Draft and Final EIS evaluates the impact of each alternative on medical and life science research in the Bay Area. The text in Section 4.4.6 has been revised to delete the reference to earth science research. The contribution of these tenants to the Presidio are more appropriately described in Section 4.4.1 (Consistency with Approved Plans and Policies) within the Draft and Final EIS.

2 - 6

Please refer to responses to comments 1-1 through 1-4.

2 - 7

The analysis is based on a worst-case assumption to ensure that impacts are not underestimated. Please refer to response to comment 2-2.

2 - 8

For TDM and mode split see master response 19. With regard to the comment regarding trip generation rates and modal splits assumed for Alternative 4, see the responses to comments 1-1 and 1-4.

2 - 9

No amendment is needed because the revised NO_x emissions (90 pounds/day) would still be significant.

Letter 3

May 15, 1999
HAND DELIVER/FAX

COW HOLLOW NEIGHBORS IN ACTION
MARINA - COW HOLLOW NEIGHBORS AND MERCHANTS
2742 BAKER STREET
SAN FRANCISCO , CALIFORNIA 94123
415 -776-3191 FAX 415 -776 - 6522

PRESIDIO TRUST
34 GRAHAM STREET
SAN , FRANCISCO, CALIFORNIA

RE : Letterman Proposals

Our organization is a group of neighbors and merchants that have the most at stake to lose with the development of these proposals. We are going to explain to you why and how the Lucus Letterman Digital should be selected as it pertains to the goals of the Golden Gate National Recreation Act , the Presidio Trust Act, and how our decision applies to the Draft Environmental Statement and Planning Guidelines.

1. The proposals must enhance the Presidio of San Francisco as a National Park.
A. Open Space - "Respect and Respond to unique characteristics of Each site" & " Integrate public access with private Development."

Existing site : 2 buildings - approx. 13 acres of open space 3-1

Lucas Letterman Digital more open space that will be approximately 113 Acres easily accessible to the public.

Shorenstein has only approximately 6 acres (mostly pavement) of open space for the public. The rest that is counted consists of sidewalks, and open space for the tenants NOT for the public.

B. Parking and Traffic

Lucas - 1500 vehicles less the Shorenstein on weekdays
Lucas - 2400 vehicles less than Shorenstein on weekends .

Traffic Patterns for Lucas is a deduction in volumes and the noise Ambiance would be less than alt 1 and the noise levels will be lower.

Traffic Patterns for Shorenstein will be approx. 16% higher that the Existing plan for Alt 1 , The noise levels would remain the same.

Weekday External Trips Lucas = 8740 Shorenstein = 11,410
P. M. Trips Lucas = 810 Shorenstein = 1,330

Weekend Internal trips Lucas = 140 Shorenstein = 320 3-2

Weekend trips - Shorenstein will generate trips from the residents And the commercial spaces more of a mall environment.

Lucas will generate only a skeleton crew for their workers. More National Park Environment.** - will encourage Their workers and other park visitors to utilize the Adjacent commercial district. Per"Enhance linkages with The rest of the Presidio and possible with the City."**

Parking Demand : Draft Eir failed to address the lack of parking of the Housing element of the Shorenstein proposal. Current standards on The outside neighborhood parking demand is two parking places for Studios and a minimum of two parking places for one bedrooms. Daytime parking weekday parking will be as follows* :**

3-3

Lucas would require an adjustment of 270 spaces.
Shorenstein would require an adjustment of 190 plus a minimum of 250 = an adjustment of 440 parking places.

***** CNET - starting jobs usually are a minimum of $50,000 a year. The workers who will be living on the premises will own vehicles.**

5-15-1999 CHNIA To Presidio Trust / GGNRA Advisory Commission.

Lucas has agreed to address and mitigate their parking deficiencies with the Neighbors .
Shorenstein has REFUSED to work with the neighbors concerning Parking deficiencies. 3-3

Emmission :

Reactive Organic Gases	**: Lucas 47.3**	**Shorenstein 59.2**
Nitrogen oxides	**: Lucas 74.1**	**Shorenstein 99.4***
Particulate Matter	**: Lucas 31.9**	**Shorenstein 42.9**
Carbon Monoxide	**: Lucas 556.4**	**Shorenstein 742.8****

*** Exceeds BAAQMD threshold criteria.**
**** Exceeds BAAQMD threshold and must be factored in with the Cumulative effects of the regional area of Highway 101 .** 3-4

WE shall address the EIR in our report to the Presidio Trust by June 26, 1999.

PLEASE VOTE FOR LUCAS - over 90% of the neighbors have voted for Lucas.

Lombard - Chestnut - Union Street Traffic interim traffic study as of 5-1-1999 by Marina - Cow Hollow Neighbors and Merchants.

700 businesses average number of workers + 4 = 2800 workers
5 customers a day drive to businesses = 3500 = 700 places
8011 restaurant & bar seats = @ number of workers 1281
1/3 customers drive to restaurant = 2670 parking places needed.
Total number of workers = 4081 (1/3 drive to work = 1360 parking places needed for workers.

Current minimum number of parking places needed = 4730 parking places.

3-5

Lombard from Lyon to Webster there are	**280 meters**
Pierce Street Parking lot	**189 meters**
Lombard Street	**240 places**
Union street Meters	**320 meters**

Total Parking places = 1029

Average parking places from Webster to Van Ness = 120
Side Streets Average parking places = 54

Total number of parking places in existence + 1203

At this moment we are at a loss of 3500 parking places.

3. 1998 Regional Mass Transportation Study

A. Golden Gate Corridor

1. Average Daily Trips are projected to increase by 46% by 2020 Since 1990.
2. Transit Trips are projected to increase 37% by 2020 since 1990.
3. 1990 average vehicles an hour a day 9115.
   Estimated daily vehicles projected by 249% increase by 2020.

B. Vehicles traveling West. 3-6

1. Cal Trans study peak hours 9=1998 3476 vehicles 5- 6 P.M. 99.8% per Mr. Sartipi of Cal Trans.
2. S.F. Department of Parking and Traffic 3495 vehicles between 5 & 6 P.M. - 95.9 % figures acquired from Tom Folkes.
3. Chnia - 3493 vehicles between the hour of 5 & 6 P.M. - 95.7% (1298 - 199)

This is an average of 97.13% of maximum capacity.

Responses to Comments in Letter 3

3 - 1

Thank you for your letter. The organization's preference for Alternative 5 (the Digital Arts Center) based on its review of the GMPA and the Draft EIS is noted for the record.

3 - 2

The organization's comments in support of the Digital Arts Center are noted for the record.

3 - 3

Comment noted. Refer to master response 20 regarding neighborhood parking.

3 - 4

The numbers cited in the text are cited in Table 22 of the Final EIS. As discussed in the text under Section 4.1.9, Air Quality, localized carbon dioxide emissions are based on future worst-case traffic volumes and meteorological conditions at the most heavily impacted intersection along U.S. Highway 101. Therefore, the air quality analysis takes into account the incremental impact of Alternative 5 on cumulative conditions within the region.

3 - 5

The commentor's calculations are noted for the record. Please see master response 20. The Presidio Trust, through implementation of mitigation measure TR-4, *Monitoring of Parking*, would ensure that the project does not contribute to parking deficiencies in the Lombard Street corridor.

3 - 6

The EIS preparers have reviewed the cited study. Page 30 of the study indicates, as stated, a 46 percent increase in corridor person trips and 37 percent increase in transit trips in the "Golden Gate Corridor." This corridor includes all of Marin and Sonoma counties and states that the bulk of traffic increases would occur in those counties. In fact, the report states that "shorter distance, intra-corridor travel is the fastest growing travel market." Therefore, even though the Metropolitan Transportation Commission (MTC) predicts a significant overall growth, most would not occur in the area of the Presidio and Doyle Drive. Furthermore, the vehicle capacity on the Golden Gate Bridge, Marina Boulevard and Lombard Street effectively constrain traffic on Doyle Drive so that significant traffic increases on Doyle Drive cannot occur.

Letter 4

NEIGHBORHOOD ASSOCIATIONS FOR PRESIDIO PLANNING

234 32nd Avenue, San Francisco, California 94121 Tel 415-636-1446 Fax 415-636-1237

Cow Hollow Association, Inc.

Presidio Heights Association of Neighbors

Planning Association for the Richmond

West Presidio Neighborhood Association

Marina Civic Improvement and Property Owners Association

Pacific Heights Residents Association

Lincoln Park Neighborhood Association, Inc.

Sea Cliff Properties #1

Presidio Terrace Association

Lake Street Residents Association

May 17, 1999

Presidio Trust Board of Directors
P.O. Box 29052
San Francisco, CA 94129-0052

Ladies and Gentlemen:

We applaud the open selection process with which you have conducted the search for the best plans and uses at the Letterman site, and we appreciate the opportunities we have had to address you about our concerns and to make suggestions.

Given the subsequent information brought to light in the Draft Environmental Impact Statement and Planning Guidelines, Neighborhood Associations for Presidio Planning ("NAPP") would like to make three additional comments:

- The overall project density appears to be too high for the twenty-three acre site upon which the plans are based; we recommend redistributing a portion of the 900,000 square feet of development to another area of the larger sixty-acre Letterman site. The selected designer(s) should work within the guidelines being developed by the Trust planning team, SMWM, as well as consider the historic placement of buildings and the planning guidelines described in Section B of the EIS. 4-1

- We remain concerned about the impact of traffic and parking on the adjacent neighborhoods and urge you to assure that plans for traffic abatement and parking standards be carefully reviewed and implemented in a timely fashion. 4-2

- The water element in the Walsh, Higgins design plan, which was not selected as one of the finalists, impressed us and we would like to see its concept incorporated into the selected plan if it is possible. We like the idea of making a physical connection to the Palace of Fine Arts site and believe that it strengthens the objective of maintaining a view corridor in that direction 4-3

Thank you for your attention.

Sincerely,

William E. McDonnell

William E. McDonnell, Jr.
Co-Chair, NAPP

cc: James Meadows

51932-1

Responses to Comments in Letter 4

4 - 1

As discussed in Section 1.2, Underlying Purpose and Need, the proposed project is needed to achieve the Presidio Trust Act's mandate that the Presidio Trust be financially self-sufficient by 2013, while managing the Presidio in accordance with the purposes of the Act establishing the GGNRA and the General Objectives of the GMPA. For a discussion of financial assumptions, see master responses 6A, 10A, and 10B. The Trust had rational reasons for proposing a project of 900,000 square feet of replacement construction on the 23-acre site. Please refer to the discussion there for a more detailed response. The Financial Management Program (Appendix E of the Final EIS) provides additional information on the financial assumptions underlying development at the Letterman Complex and elsewhere within the Presidio. The preferred alternative calls for the removal of LAMC and LAIR and other non-historic buildings (as described in the GMPA) with replacement construction of up to 900,000 square feet (LAMC and LAIR together total in excess of 800,000 square feet). Consistent with the GMPA land use concept for the Presidio, replacement of existing square footage in already developed areas would allow for the restoration of open space elsewhere, such as along the Tennessee Hollow corridor on the western edge of the Letterman Complex. The total square footage for the Letterman Complex would not exceed the existing 1.3 million square feet and the height of new buildings would be equal to or less than that of nearby structures with a maximum height of 60 feet. The density of new development on the 23-acre site would be more spread out than what currently exists, in order to adhere to the proposed height restrictions. This would achieve a more compatible, lower height design that would improve the visual integrity of the complex and minimize impacts on scenic viewing. New construction would be designed and sited to be consistent with the Presidio's National Historic Landmark status and adhere to the Planning Guidelines for the Letterman Complex (Appendix B). Please see Section 1.4 of the Final EIS.

4 - 2

The comment regarding review and implementation of traffic and parking plans is noted for the record. The Presidio Trust is working with Caltrans and the San Francisco Department of Parking and Traffic to ensure that all plans are reviewed and implemented prior to occupancy of the 23-acre site. The plans described in the EIS were prepared to ensure mitigation of all significant traffic and parking impacts resulting from implementation of the proposed project. Refer to master response 18 regarding access to the site and 20 regarding parking.

4 - 3

Comment noted. A sustainable water feature is included in the site plan for the preferred alternative. This feature is a lagoon at the northeast corner of the site which would be fed by captured stormwater. In addition, the preferred alternative incorporates an underground cistern for storing rainwater and re-collecting irrigation water that would be reused on the site. As discussed in the Planning Guidelines (Appendix B), visual and future pedestrian connections to the Palace of Fine Arts would be encouraged under all alternatives.

Letter 5

1

GOLDEN GATE NATIONAL RECREATION AREA
AND POINT REYES NATIONAL SEASHORE

ADVISORY COMMISSION

MINUTES OF THE ADVISORY COMMISSION MEETING
MAY 18, 1999

[A verbatim transcript of this meeting is available for public review in the Office of Communications and Partnerships, GGNRA, Building 201, Fort Mason, San Francisco, CA 94123. The following is a brief summary.]

Meeting time: 7:30 to 10.10 p.m.
Location: Building 201, Fort Mason, San Francisco, CA

Present for the Advisory Commission:
Chair Rich Bartke, Vice Chair Amy Meyer, Michael Alexander, Howard Cogswell, Naomi Gray, Redmond Kernan, Mel Lane, Trent Orr, Carlota del Portillo, Lennie Roberts, Merritt Robinson, Jack Spring, Hank Sciaroni and Jacqueline Young.
Staff Liaison: Michael Feinstein.

Present for the Golden Gate National Recreation Area:
General Superintendent Brian O'Neill, Presidio General Manager B.J.Griffin, Curator of Military History John Martini and Plant Ecologist Sharon Farrell.

Present for the Presidio Trust:
Executive Director Jim Meadows, Deputy Director Real Estate and Planning Jane Blackstone, Planning Manager Carey Feierabend, NEPA Compliance Manager John Pelka and Transportation Manager Dick Tilles.

Summary of Matters Discussed:

FORT BAKER'S BATTERY CAVALLO

John Martini, the park's curator for military history, briefed the Commissioners on the history of a hidden jewel called Battery Cavallo which over the course of time has become more and more historically significant. He illustrated his remarks with slides showing Civil War cannon that could fire 400-pound cannonballs four miles and the brick forts built to house them, that then became obsolete and were replaced with earthwork forts, of which Battery Cavallo is the best preserved example. Today it is being vandalized by mural artists, challenged by off-road travel, foot traffic and mountain bikes and overgrown with native vegetation.

Sharon Farrell, a plant ecologist, said this small pocket of land (nine acres) provides a unique refuge for a diversity of plant and animal life, supporting cliff-dwelling and scrub-nesting bird species, as well as live oak woodland, coastal coyote bush, California sagebrush and coastal perennial grassland habitat. She said there are more than 80 different native plant species in the area including over eight native bunch grasses and a diversity of wildflowers, such as paint brush, poppies, coast buckwheat and the Mission blue butterfly's host plant, the silver leaf lupine. There are also many invasive exotic plants including French broom. The park staff's plans are to maximize the cultural and natural resource values of Battery Cavallo.

2

BAY AREA RIDGE TRAIL: PRESIDIO ALIGNMENT

Carey Feierabend, Planning Manager for the Presidio Trust, said the Bay Area Ridge Trail, a 400-mile looped trail traversing the ridges surrounding the San Francisco Bay Area connecting the parks and open spaces, has been under design and development for some time. Focusing this evening on just the Presidio segment, she said the proposed alignment is the result of an extended analysis by NPS and Trust staff, landscape architects and Bay Area Ridge Trail staff. She introduced Clifford Janoff from the Bay Area Ridge Trail Council who said the Presidio alignment is the final piece of the ridge trail lin San Fmacisco County, which will be the first county where the trail is complete.

Chairman Bartke asked Commissioner Kernan, chair of the Presidio Committee, what the thoughts of the committee were on the alignment. Commissioner Kernan presented a Resolution from the committee and moved its adoption by the full Commission. The motion was seconded and carried.

LETTERMAN DRAFT EIS

Jim Meadows said the draft environmental impact statement for the Letterman Complex was released on April 19, and the technical staff will be giving the detailed briefing on the six alternatives. Four of the alternatives parallel but are not exactly the same as the four finalists in the selection process. The first is the original GMPA alternative and the last is the no-action. By the end of May, the Trust Board of Directors is scheduled to announce a preferred alternative but the final selection will not occur until after the final EIS is actually published. He turned the mike over to Jane Blackstone to introduce the technical team.

Jane said the team consisted of herself, Carey Feierabend, John Pelka who is the NEPA Compliance Manager and Dick Tilles who is the Transportation Manager. The team gave a detailed presentation providing some context for the public comments later that evening. Jane reiterated the Trust's mission, the makeup of the Trust board, and that which guides the Trust, namely, the Presidio Trust Act and the general objectives of the GMPA. After a brief review of the project history of the Trust, she introduced Carey Feierabend.

Carey said the 900,000 square feet of construction within a 23-acre parcel within the 60-acre Letterman Complex is the Presidio's largest development opportunity and will help meet the Trust's objectives as laid out by Congress. The supplemental EIS, she said, focuses on those issues which were not fully analyzed in the 1994 document, or where conditions have changed. She walked the Commissioners through the six alternatives, then introduced John Pelka.

John said by summarizing the issues and incorporating mitigations from the GMPA EIS, they have been able to concentrate on those issues germane to the project at hand, thus reducing the 37 impact topics addressed in the GMPA EIS to 12 issues. Those issues are consistency with the GMPA, solid waste, impacts on: water supply, schools, housing, cultural resources, archeological resources, air quality, noise environment, scenic viewing, cumulative impacts and traffic and transportation. He highlighted the major conclusions within each of the impact topics, then introduced Dick Tilles.

Dick said they analyzed traffic in the year 2010 (as in the original GMPA analysis) and assumed the new development would take place prior to the reconstruction of Doyle Drive. Their three major tasks were to look at: the impact of new development relative to Alternative 1; the impacts of the various alternatives relative to each other, and the improvements required to handle traffic. The analysis was based on square footages of use (using SF guidelines), the number of internal and external trips, transit subsidies and bicycle amenities. The results show that Alternatives 2 through 5 have impacts very similar to Alternative 1 (original GMPA).

Chairman Bartke, after noting that the public hearing is on the environmental impact statement only, opened the public comment period.

3

Public Comment:

Patricia Vaughey (Cow Hollow NIA) said their most concerned issue is the parking. There is none. Another concern is the emissions, particularly carbon monoxide, because the EIR does not address the cumulative effects as shown in the transportation study of August '98. She said both developers were asked if they would be willing to mitigate parking issues. Lucas said yes. Shorenstein has not answered them. 5-1

Karen Beastman (CA Indian Museum) said the Presidio is ancestral tribal land and every school child in the Bay Area in their fourth grade should come and learn about California Indians at their museum and help celebrate their culture and history and traditions. 5-2

Marianne Cavalier lives across the street from Letterman and people in her neighborhood of Richardson, Lyon and Francisco endorse the Lucas Digital proposal. The EIS does not address the problems caused by the weekend and evening traffic the Shorenstein proposal will create. Nor has it addressed tourist and special event buses. A proposed traffic light change at Francisco and Richardson would not allow her or her neighbors to access their garages. 5-3

Richard Reisman (Shorenstein-Interland) provided an 8-page document of additions since the March "Presidio Village" proposal detailing enhanced items for the visitor experience including a visitors center with information on public attractions. He said their professional will comment on traffic. Also, they have just printed a document about sustainability which their consultant will address later. 5-4

Margot Parke (NAP) thanked the Trust for the open process and the opportunity to ask questions of the four finalists. NAP still thinks the overall density is too high for the 23 acres and recommends redistributing a portion of the 900,000 to another area of the 60-acre Letterman site. They are also concerned about the impact of traffic and parking in the neighborhood. She submitted a letter to the Commission. 5-5

Chi-Hsen Shao (Shorenstein-Interland) disagreed with the EIS analysis on trip generation since the employment density for Shorenstein proposal is actually lower than the other proposal. The internal trips estimate did not consider the 25 percent of CNET employees who will live on site. Re the trip distribution patterns, CNET surveyed and found that 75 percent of its employees live in the city, which needs to be considered. So the EIS analysis needs to be revised to reflect lower vehicle trips and therefore lower impacts by the Shorenstein proposal. 5-6

Stephen Casey is a cyclist who regularly cycles in the Presidio and knows that traffic is already pretty bad. He is concerned that not enough consideration was given to alternative means of transportation. A parking garage violates the original tenets of the GMPA, he believes. 5-7

Mark Middleton, restricting his comments to sections of DEIS summary, believes the regional economy and employment is likely to receive its greatest boost from the Digital Arts Center. And its labor pool will consist of the highest wage earners with the largest tax base. The Digital Arts Center does not compete with local retailers outside the park, while the Shorenstein proposal creates an opportunity to move retail into the park. He suggested hiring a private agency to share responsibility with the Park Police. He prefers the long, sweeping lawn of the Lucas proposal to the Shorenstein approach of an office complex with a park dropped in the middle. Another issue is manageabaility and profitability, which is assured with the Lucas proposal. Whereas with a mixed-use facility you have a variety of tenants and how do you know they will be able to continue to pay for the space? He said he hoped a decision as important as this would be decided on the merits and not on politics. 5-8

Donald Green said that if the 900,000 square feet is dropped to 700,000, that would reduce the income by a million dollars out of the $36 million the Trust is hoping for. He said he would like to see something on where the money is going and where it is coming from and how the Trust anticipates using it all. He believes the Trust can get at least 200 additional units of housing by converting the larger duplexes at about $20 million versus $40 milllion for building 200 new units a Letterman. He looks forward to meeting with the Trust and discussing this further. 5-9

4

James Morrison (SF Bicycle Advisory Com.) said there is confusion about the number of external trips generated, the press saying 5,700. As a general rule, bike lanes are advisable when you get above 3,000 and should be included at a very early level instead of waiting until a dangerous situation for bibycles is already created. 5-10

Bill Francis (Shorenstein-Interland), a managing principal in a parking consultant firm, believes the Shorenstein project has ample parking to serve 150 people. Those employees will be able to live and work in the same area and take the Presidio Village shuttle anywhere in the area. The demand for employee parking will be less because the consultants report for the Trust showed that approximately 220 will not drive because they will be walking from their apartments. So the Shorenstein proposal is the least likely to spill over into the neighborhood and compete with local parking. 5-11

Lucia Bogatay said she hoped in recommendations to the Trust the Commissioners are sympathetic to the difficulty they are probably having striking the right balance between achieving economic goals and preserving the vision of the Presidio as a national park. She said she would reserve detailed design analysis for her written comments. 5-12

Rita Agnese asked for a show of hands by people who drove, took a bus or biked to the meeting. She is concerned that not enough parking will be provided. She resents the two candidates not planning properly for the parking problem they are going to create. 5-13

Buck Kales said that of the two proposals before the Trust, one is plain and simply a politically expedient housing development. The other is, in his opinion, an environmentally sound park within a park. He urged the Board of Directors of the Presidio Trust to support the Lucas proposal for the Digital Center. 5-14

Lynn Simon (Shorenstein-Interland), a sustainable building consultant, said she wanted to share with the Commission a document that their team has put togehter that addresses their broad-based goals on sustainable development. It is a complicated issue, not a singular issue and is really about diversity, diversity of tenants and diversity of balanced use and mixed use. 5-15

SUPERINTENDENT'S REPORT

Brian O'Neill said there had been two significant developments over the last year that are important to the future of the park. One of is that the Secretaries of Transportation and Interior have signed an MOU to address comprehensively the issue of access to and access within national parks. Golden Gate is one of five parks to be a pilot park in that effort. That was followed up by a MOA signed by Secretary Slater of the DOE and Secretary Babbitt of DOI to launch what is referred to as the Green Energy Parks Program, promoting use of energy efficient and renewable energy technologies. And, again, Golden Gate is one of the pilot parks. Lastly, he said one of the events tied to ESPN X-Games, which San Francisco is hosting, is being proposed to occur out in the Cliff House-Sutro Heights Park area. He said the park is well along in approving the final details of that permit to deal with the impacts of the project on visitor use.

PRESIDIO GENERAL MANAGER'S REPORT

B. J. Griffin said there was a wonderful ceremony recently to commenorate the contributions of the Japanese-American soldiers at the Presidio. Senator Akaka of Hawaii was the keynote speaker. From there they took a ferry to Angel Island because Senator Akaka was instrumental in getting legislation passed that calls for a study of an immigration museum. And Angel Island is the immigration station for the west. The study is underway.

PRESIDIO TRUST DIRECTOR'S REPORT

Jim Meadows said that one of the key issues in making the Presidio a success is their partnership with the NPS. Their planning activities over the summer are going to be concentrating on natural areas and open space at the Presidio. He announced that on June 9,

5

from 6 to 9 p.m., they will be discussing the vegetation management program. In the public process so far, over 1500 people have been involved in public hearings and public workshops and private neighborhood groups. Also coming up this summer will be the Public Health Service Hospital complex, which will also be a 12-month process. The golf course clubhouse is about 75 percent complete and the opening is scheduled for June 30. The fire station is well on its way to completion and should be occupied by the fire department by July.

COMMITTEE REPORTS

San Francisco Committee. Chairman Jack Spring said the committee met and spent a good deal of time talking about the ESPN Games, and the cooperation between the City, ESPN and the Park Service. But because the committee learned that the Park Service had not been brought into the process until the decisions had been pretty well made, they suggested a letter from the Commission should be addressed concerning future events that are adjacent to or involve park properties.

In addition: the committee had a report on the Fort Mason Officers Club that a satisfactory agreement has been worked out between the Army and NPS; there was a report from Alcatraz on a proposal to install photovoltaic cells on the new industries building, where it would not be obvious to the public that they were there; there was a report that there is a group now working on the Lands End trail; and a report that the Regional Director has committed Building E at Fort Mason to the Maritime National Park for storage of maritime artifacts until October 1, 2000. Lastly, the Superintendent suggested that the committee make a field trip to East Fort Miley to look that over.

Chairman Bartke said, if the Commission wished, he would work on a letter expressing a desire that the Park Service be involved much earlier in the planning process in the future.

Marin Committee: Chairman Merritt Robinson said that in discussing Fort Baker, they recognized that transportation was a key element in keeping peace with Sausalito and having something that really works to benefit society. On the cell site proposal for the Marin Headlands between the tunnel and the bridge, the plan is to use a light tower to hold the antenna itself and cover the supporting equipment with bushes alongside the road. There was an update on the Muir Woods Transportation Study which might include use of the Caltrans parking lot during the weekends.

Presidio Committee: Chairman Kernan said two of the subjects, the Ridge Trail and the EIS, had already been covered. Which left the cell site approval process, about which there were concerns expressed. Committee members were offered the opportunity to tour some of the suggested sites and look at the plans before meeting again. He suggested that occur.

Chairman Bartke said the next meeting would be at 7:30 p.m., on Tuesday; June 15, 1999, in this same room. There being nothing further to come before the Commission, the meeting was adjourned at 10:10 p.m.

There were appxoimately 100 members of the public present.

Responses to Comments in Letter 5

5 - 1

Regarding parking availability and developer mitigation of parking, see master response 20. Regarding emissions, see the response to comment 3-6.

5 - 2

Comment noted. The California Indian Museum is a proposed tenant of Presidio Village.

5 - 3

The commentor's support for the Digital Arts Center is noted for the record. The EIS did not quantitatively address weekend and evening traffic demands because analysis of weekday, evening and weekend traffic (NPS 1999f) indicated that the highest traffic occurs during weekday peak hours. Designing to handle that level of traffic would also accommodate demands on the weekends and in the evening. Tourist and special event buses are being addressed park-wide in the Presidio Trust's Tour Bus Management Study. The data collection phase for this study is complete and the Trust is expected to enter the analysis and recommendations phase in 2000. Neighborhood meetings will be an important part of this study. Refer to master response 18 regarding proposed new intersections at the Gorgas Avenue Gate.

5 - 4

Comment noted. The documents were forwarded to the Presidio Trust for review and consideration.

5 - 5

Please refer to responses to comments 4-1 through 4-3.

5 - 6

In addition to the number of employees at a facility, the type of activity affects the trips generated by a particular use. For example, while the employee density may be similar between research and development (R&D) and office uses, R&D facilities typically have a lower number of non-work trips (e.g., deliveries, visitors, and out-of-office meetings). In addition, the distribution of trips throughout the day varies between office and R&D uses. As a result, the daily and the p.m. peak-hour trip generation is lower for R&D than for office uses. It should be noted that the employment density is not substantially different between Alternatives 4 and 5. The average employment density is between 309 and 375 square feet per employee for Alternative 4 (range of 1,400 to 1,700 employees), and about 360 square feet per employee for Alternative 5.

For alternatives that included residential units that would be available to employees at the 23-acre site, a credit was applied to the residential component, and therefore the internal trips due to the onsite housing were incorporated into the trip-generation estimates. The residential credit assumed that half of the work trips associated with each dwelling unit would be internal to the site.

A consistent geographic distribution of employee and visitor trips to and from the Letterman Complex was applied to all development alternatives. This geographic distribution was based on a 1998 survey at the Presidio. Overall, about 55 percent of trips (both employee and visitors) are expected to start or end within

San Francisco, 24 percent in the East Bay, 14 percent in the North Bay and 7 percent in the South Bay. This distribution was confirmed in a recent 1999 employee survey. While it is possible that 75 percent of CNET employees live in San Francisco, detailed documentation of the survey was not provided. In addition, CNET would only be one of a number of tenants that would occupy the office complex in Alternative 4. See the response to comment 1-4 relative to CNET's mode split.

Impacts associated with vehicular traffic generated by Alternative 4 were mitigated to a less-than-significant level by the implementation of intersection improvements (TR-2 and TR-3) at the intersection of Gorgas Avenue/Richardson Avenue/Lombard Street. These mitigation measures are common to Alternatives 1 through 5.

5-7

Refer to master response 19 regarding TDM measures to reduce automobile transportation. The GMPA does not specifically address underground parking; it neither advocates nor prohibits it. Rather, the GMPA identified a number of parking spaces Presidio-wide as well as by specific planning area to be provided to support new park programs and uses. Then it becomes a design question as to how these spaces are provided — either in surface lots or underground parking. The benefit of providing the spaces underground is that it allows for more public open space in areas currently covered in asphalt. The Presidio Trust requested that the development teams consider underground parking to maximize the amount of open space at the 23-acre site.

5-8

Comments noted. The impacts of the alternatives on the local economy, law enforcement and open space are discussed in Section 4 and Appendix A of the Draft EIS and Final EIS. The Presidio Trust identified its preferred alternative among the alternatives presented in the Draft EIS, using the criteria discussed in the document and considering the variety of information contained in the document concerning the environmental and other impacts of each alternative.

5-9

The commentor is referred to the Financial Management Program (Appendix E of the Final EIS) for a projection of revenues and expenditures associated with Presidio Trust programs. If replacement construction at the 23-acre site was reduced from 900,000 square feet to 700,000 square feet, with no corresponding increase of replacement construction elsewhere, the Presidio Trust would lose approximately $2 to $3 million of annual revenue, resulting in a deficit of $2 to $3 million in fiscal year 2013. The commentor's suggestion that subdivision of larger duplex housing units could create 200 additional housing units is noted for potential future study. Please refer also to master responses 10A and 10B.

5-10

The maximum number of daily external vehicle trips in and out of the complex is 5,140 (Alternative 4). The need for bike lanes is not a function of external vehicle trips coming in at various points, but a function of factors relating to a given street such as traffic volumes, traffic speeds, bicycle volumes, inclusion on a signed

bicycle route, and whether the street is wide enough to accommodate the lanes safely. Please refer to mitigation measures TR-6 and TR-7 in the Final EIS.

5-11

Comment noted. Please note that the comment was intended to refer to parking for 1,500 persons, and not for 150 people as reported in the minutes. The impacts of parking demand and supply are summarized in Table 11 of the Final EIS.

5-12

Comments noted. Please refer to Letter 65 to review the comments submitted by the Commissioners to the Presidio Trust Board for their consideration, and to Letter 33 for the speaker's written comments.

5-13

Refer to master response 20.

5-14

The speaker's preference for Alternative 5 is noted for the record.

5-15

Please refer to response to comment 5-4.

Letter 6

May 19, 1999

Statement regarding Presidio/Letterman Development
The people in my neighborhood of Richardson, Lyon and Francisco endorse the Letterman Digital Proposal. However we do have some serious concerns re: parking and traffic.

The ingress & egress elements of the EIS are flawed & these should be addressed before any action is taken. 6-1

EIS does not address: The additional congestion and pollution and traffic and parking problems which will be caused by weekend and evening traffic the Shorenstein proposal will create. Nor has the EIS addressed the tourist and special event busses or alternative routes and ramps for cars and construction vehicles that would mitigate traffic in the interim stage of development. 6-2

The proposed traffic light change at Francisco and Richardson will not allow my neighbors and me access to our garages. We need a frontage road from Francisco to Lyon, which will allow us access to our garages. Has a study been done regarding the flow of traffic if all these new stop lights are built? 6-3

Has **anyone** considered the quality of life for us as neighbors? If so why the decision to develop 900,000 sq.ft. Why such density and why before Doyle Drive is rebuilt? 6-4

Letterman Digital Proposal is the plan that will have the least negative impact upon the neighborhood and the Presidio and will enhance the Presidio as a National Park.

Marianne Cavalier 921-0684

Responses to Comments in Letter 6

6 - 1

Comment noted; please see following comments 6-2 and 6-3 for specific responses.

6 - 2

Table D-11 within the EIS addresses weekend parking. Weekend and evening traffic was not addressed in identifying traffic mitigations because the sum of existing traffic plus traffic generated by any of the alternatives would be highest during weekdays. As noted by the commentor and in the EIS, Alternative 4, given its mix of office, residential and hotel, would be more likely to have higher traffic volumes on weekends and evenings than alternatives which do not have residential or hotel uses.

See the response to comment 5-3 for a discussion of tourist and special event buses.

The proposed routes for construction vehicles are shown in Figure 19 and discussed in Section 4.1.7.7 of the EIS. A construction traffic management plan as discussed in mitigation measure TR-5, *Construction Traffic Management Plan* would be developed to further specify routes, times of operation, and other factors to mitigate construction impacts on neighbors both inside and outside the park.

6 - 3

Please refer to master responses 18 and 20.

6 - 4

Please refer to Section 1.2 of the Final EIS and master responses 10A, 17, and 21.

Letter 7

NATIONAL AUDUBON SOCIETY, GOLDEN GATE CHAPTER * NATIONAL PARKS AND CONSERVATION ASSOCIATION * NATIONAL TRUST FOR HISTORIC PRESERVATION * NATURAL RESOURCES DEFENSE COUNCIL * SAN FRANCISCO LEAGUE OF CONSERVATION VOTERS * THE WILDERNESS SOCIETY * YERBA BUENA CHAPTER, CALIFORNIA NATIVE PLANT SOCIETY

24 May 1999

MAY 26 '99
RECEIVED

James Meadows
Executive Director
The Presidio Trust
P. O. Box 29052
San Francisco, CA 94129-0052

Dear Mr. Meadows:

The undersigned organizations regret to inform you that we cannot support the process by which the Presidio Trust intends to select the developer for the Letterman complex. As currently structured, this process ignores clear statutory mandates, including the mandate for meaningful involvement by the public. If the current process is not revised, we fear that it will undermine the Presidio Trust's credibility. Not only will the publicly supported vision for the Presidio fail, but so will the Trust's mandate for financial self sufficiency.

We do not make this statement lightly. As a community, we supported the Presidio Trust legislation and, like you, take seriously the responsibilities placed by that law on the Trust, the National Park Service, and the public. However, unless course corrections are made to this process, the precedent set at Letterman is likely to result in greater confusion and controversy with each subsequent planning effort. The Trust has embarked on a process that does not comply with applicable law.

7-1

The National Environmental Policy Act (NEPA) sets forth clear requirements with which agencies must comply in making decisions involving major federal actions, such as the planning and decisionmaking for Letterman. We believed the Trust understood these requirements when it chose to adopt the National Park Service's NEPA guidelines and entered into a Memorandum of Understanding with the Service over NEPA implementation. Unfortunately, this was not the case. In particular, we believe that the Request for Proposals for Letterman varied so substantially from the Presidio General Management Plan that an amendment should have been prepared pursuant to NEPA. Of equal importance, we believe that selection of the Letterman developer, while the public comment period on the draft Letterman EIS is still open, is also a violation of that Act. As the result of these violations, the public has been denied the opportunity for adequate and meaningful comment that NEPA was intended to provide.

We wish to meet with you and your General Counsel, before you proceed any further, to discuss these and other issues in the hope that we can correct these fatal errors to the NEPA process. We

James Meadows
May 24, 1999
Page Two

are very mindful of the time restrictions placed on the Trust. The statutory deadline for self-sufficiency, however, cannot excuse the Trust's failure to meet its non-discretionary obligations to comply fully with NEPA. 7-1

Sincerely,

Arthur Feinstein, Executive Director
National Audubon Society, Golden Gate Chapter

Brian Huse, Director, Pacific Region
National Parks and Conservation Association

Elizabeth Goldstein, Director, Western Office
National Trust for Historic Preservation

Johanna Wald, Director, Land Program
Natural Resources Defense Council

Amandeep Jawa, President
San Francisco League of Conservation Voters

Jay Watson, Regional Director
The Wilderness Society

Pete Holloran, President
Yerba Buena Chapter, California Native Plant Society

Response to Comment in Letter 7

7-1

The Trust recognizes and appreciates the long-term commitment of the commenting organizations to the protection of the natural, cultural and historical resources of the Presidio, appreciates the opportunity to have opened up a working dialogue with these groups, and welcomes the opportunity to continue to work with these and various other organizations towards those goals. In response to the commentors' request, the Presidio Trust through its Executive Director and/or its General Counsel has met with this group of organizations on several occasions to discuss issues of concern. For response to the comment concerning compliance with applicable law and opportunities for meaningful public comment and involvement, refer to master responses 1A and 1E. For response to the comment concerning the need to amend the GMPA, refer to master response 2B. For response to the comment concerning the apparent selection of a developer during public comment, refer to master response 6B and Section 5.2 of the Final EIS.

Letter 8

SIERRA CLUB

PRESIDIO TRUST REC'D

PRESIDIO TASK FORCE

May 26, 1999

VIA FAX 561-5315

The Board of Directors
The Presidio Trust
34 Graham St.
Presidio of San Francisco CA 94129

Comments on Letterman Draft EIS as they Affect the Selection of a Preferred Alternative

Dear Board Members:

Today or tomorrow, you are expected to select your Preferred Alternative proposal for the Letterman Complex. While the Sierra Club's analysis of the Letterman Draft EIS is not complete, we wish to comment on two items which may influence your difficult decision.

TRAFFIC IMPACTS.

We would like to draw your attention to significant errors in the DEIS regarding traffic impacts. Our analysis generally agrees with that of that of JUD Consultants[1] that the DEIS applies erroneous assumptions which result in overstated traffic impacts for the Shorenstein/ Interland Presidio Village alternative.

The DEIS says that Presidio Village will generate 5,700 weekday vehicle trips that go outside of the Presidio, compared to Lucas's Digital Arts Center's 4,360 trips. Revised calculations show that Presidio Village will generate an estimated 2,900 trips. To put it simply, instead of Presidio Village generating 1/3 more weekday traffic than the Lucas proposal, it will generate 1/3 less. 8-1

HOUSING.

We are convinced that locating Letterman housing close to Chestnut Street's abundant services offers the best opportunity to reduce traffic impacts and provide the highest quality of life for 8-2

[1] Letter to Presidio Trust, May 1, 1999, presented at GGNRA Advisory Commisson meeting, May 18, 1999.

1717 MASON STREET SAN FRANCISCO CA 94133 (415) 441-6700 FAX (415) 346-6607

Presidio Trust Board
May 26, 1999
page 2

residents of the park and the adjacent neighborhood. Presidio Village housing is less than 1/4 mile from Chestnut St. stores. Numerous studies of successful pedestrian-friendly neighborhoods have shown that 1/4 mile is the maximum distance people will walk for goods and services.

It has been suggested that housing for the Lucas proposal instead could be built at the western end of the Letterman Complex, closer to Halleck St. Such housing will be at least 1/2 mile from Chestnut St., which will guarantee higher automobile use. Discouraging auto trips from the western site will require a more expensive transportation system, or the need to (inappropriately and inefficiently) provide those shops and services within the park. 8-2

Whatever your decision, we look forward to your conduct of negotiations which will produce the highest quality of urban and architectural design and wonderful experiences for the Presidio's visitors.

We will comment more fully on the DEIS, including further analysis of the traffic impacts, by the comment deadline.

Yours sincerely,

Michael Alexander
Chair

Responses to Comments in Letter 8

8 - 1

See the responses to comments 1-1 and 1-4.

8 - 2

As discussed in Section 2.7, the preferred alternative does not include provisions for housing. The commentor's assertion that locating housing close to Chestnut Street's services offers the best opportunity to reduce traffic impacts is noted for the record.

Letter 9

UNIVERSITY OF CALIFORNIA, BERKELEY

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ARCHAEOLOGICAL RESEARCH FACILITY
2251 COLLEGE BLDG.
(510) 642-2212

BERKELEY, CALIFORNIA 94720-3710
FAX: (510) 643-9637

Cherilyn Widell
Compliance and Permitting Manager
The Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

5/28/99

Dear Cherilyn:

Many thanks for sending me the information on the draft environmental impact statement involving the proposed projects for the Letterman site on the Presidio. I also appreciate the invitation to attend the June 10th meeting that will discuss the potential effects of the proposed projects on cultural properties in the Letterman site area. Unfortunately, I will be unable to attend the meeting. But I did not want to send you my comments on the draft environmental impact statement.

In regards to my concerns about the archaeological remains and cultural resources that may be impacted by the proposed projects, I feel that they are sufficiently addressed in the draft environmental impact statement. Adverse effects of construction or significant modifications to the existing the cultural landscape will be addressed by archaeological testing prior to construction, as well as systematic monitoring during construction. I think your plan to require preconstruction archaeological testing is excellent. As the draft environmental impact statement indicates, the likelihood of detecting either prehistoric or historic archaeological remains in the Letterman area is quite high – especially given its proximity to the prehistoric/historic bayshore. It will save the Presidio Trust considerable time and aggravation to locate archaeological remains in the impact areas prior to any construction work. 9-1

Again, many thanks for inviting me to the June 10th meeting. I am sorry that I can not make it. Let me know if you have any questions about my comments above, or if I can be of any assistance.

Sincerely,

Kent G. Lightfoot
Professor of Anthropology

Response to Comment in Letter 9

9-1

Thank you for your letter. The commentor's opinion on the adequacy of the archeological monitoring program is noted for the record. Also, please refer to the Archeological Management and Assessment Program in Appendix A to Appendix F of the Final EIS.

Letter 10

2831 Cabrillo Street
San Francisco, CA 94121
Phone (415) 752-9412
June 7, 1999

RECEIVED

NEPA Compliance Coordinator
Attn: Letterman Complex
Presidio Trust, 34 Graham Street
P.O.Box 29052
San Francisco, CA 94129-0052

This is to provide comments on the **DRAFT** (dated April 1999) "EIS and Planning Guidelines for New Development and Uses within the Presidio's Letterman Complex." As a private individual, it seems to me that this subject has not been adequately explored; several highly-significant conditions have changed since the 1994 GMPA. I believe the Draft Amendment to the EIS is inadequate and therefore it is presently unacceptable for the following reasons:

1. **PIECEMEAL PRESENTATION OF OVERALL PLANNING CONCEPTS**

For publicly owned and supported agencies there is a continuing responsibility to develop a ***COMPREHENSIVE MULTI-YEARED PLANNING DOCUMENT***, typically for five years into the future but updated on a yearly basis. Necessarily that many of the factors of such plans are synergistically related and thus cannot be taken out of the fuller context.

With specific regard to the April 1999 Draft EIS, there needs to be a full discussion and analysis of:

* The intended/proposed uses of the ***ENTIRE*** 60 (sixty!) acre Letterman complex -- not just a snapshot limited to the 23 acres!
* The ***ENTIRE*** 1500-acre Presidio -- not limited to just the 23 acres or 60 acres!

10-1

At public meetings it has been stated -- repeatedly -- that "replacement new construction is not required to occur in the exact footprint of the location where buildings are demolished." For that principle to be truly applicable, the ***COMPREHENSIVE*** Draft EIS & Master Planning Document must provide the public with alternative analyses on critical topics such as:

A. **EMPLOYEE HOUSING.** Additional (and/or replacement) housing units could be located -- alternatively -- along Lincoln Blvd (1500 area), along Washington Blvd (400 area) and/or along Quarry Road (800 area) or wherever --but not limited to the 23 acres in "Letterman Complex."

B. **HOTEL/INN AND/OR SENIOR HOUSING.** Similarly if the Trust's Comprehensive Planning Guidelines are to include a hotel or inn or senior housing (utilizing allowable square footages generated by a comparable demolition anywhere on Presidio), analyses should be provided for alternative sites (not limited to LAMC/LAIR's footprint). Such sites might -- conceivably -- include LAMC/LAIR or the site of Army's former consolidated Motor Pool or existing Commissary (600 area) or at former Public Health Hospital (1800 area) or wherever! But again, not limited to the 23 acres.

C. **OFFICE BUILDINGS** (general purpose, film labs, multi-media or any other special use). Again, the 1999 Supplement to the 1994 GMPA should address a variety of alternative sites for these purposes, recognizing that some of the limitations presented in the 1994 document (now obsolete) are no longer applicable. For example, the Sixth Army is obviously no longer a "tenant" at Presidio.

Summarizing, my point is that the April 1999 **DRAFT** EIS is intrinsically flawed and unacceptable in that it fails to discuss the inherent synergistic effects of a decision about LAMC/LAIR's "23 acres" upon the entire 60-acre plot and upon the Presidio as a complete entity (1500 acres). 10-1

It's generally agreed that whatever is placed or retained in the LAMC/LAIR footprint is very important, as this "anchor tenant" could have a disproportionately-large impact upon the overall Presidio planning. Accordingly this sub-plan must not be piece-mealed out of the fuller context.

2. **TRAFFIC ANALYSIS -- INCLUSIVE OF DOYLE DRIVE "RELOCATION"**

Although the extensive public use now being made of Army's former Gym and Pool (Bldgs 1152 & 1151, under YMCA's auspices) is highly commendable, it's created a Russian Roulette situation wherein the exuberant children are being placed under significant risk to vehicular traffic along Gorgas Avenue. The present situation is bad! But it emphasizes that any future development must be guided by full understanding of impacts of Doyle Drive. It's understood that results of preliminary engineering and design efforts for this Doyle Drive reconstruction are expected within a year or two (2001?). Obviously development of plans for 23/60-acre Letterman Complex must be carried out proactively and collaboratively with CalTrans and CCSF to avoid an unnecessary fiasco -- comparable to what's now ongoing over the alignment of the Bay Bridge on Yerba Buena Island. 10-2

3. **HEALTH CARE IN SAN FRANCISCO BAY AREA**

The NPS's final GMPA & EIS (July 1994) touched briefly upon the impacts of the potential losses of both LAMC and the former Public Health Service Hospital. It was stated (pages 174-175) that their loss (to the larger community) would have **NO** impact upon **ACUTE** care facilities because there was then (1991) an oversupply of acute-care beds, but an adverse impact upon **LONG-TERM** chronic care facilities because even then (early 1990's) there was an "unmet demand" for chronic care beds.

During the ensuing years -- from 1991 to 1999 -- there seems to have has been a dramatic change in the availability of all such facilities. And it is possible that during the next few years there will be urgent need for additional hospital beds for both acute-care and chronic long-term care. I do not profess to be offering a comprehensive analysis! But before the Presidio Trust can be said to have completed a comprehensive and objective EIS, it must address the fact that the existing publicly-owned (presently inactive) hospital facilities on Presidio (Bldgs 1100 and 1801) have a substantial potential reuse value (of perhaps $500,000,000) and that **BEFORE** demolition of these publicly-owned facilities is started at either site there is an obligation to produce a **COMPREHENSIVE** EIS dealing with new factors, including: 10-3

A. **SENATE BILL 1953 (SEISMIC UPGRADES).** This is a 1994 California law that requires all acute-care facilities to meet certain seismic safety standards by the year 2008. Before Jan 1, 2001, each hospital must submit a seismic renovation plan outlining what it will do over the next seven years to achieve compliance. In some cases it might be necessary for hospitals to abandon

abandon their present structures and rebuild. But even if only retrofit (seismic bracing) is required, it is predictable that during the next decades there will be a substantial loss of available hospital beds as major renovations are ongoing.

B. **LONG-TERM CARE -- LAGUNA HONDA** (?) During the past year the people of San Francisco have become informed about the deplorable condition of our massive (1200-bed) Laguna Honda facility. Planning for replacement and/or reconstruction is only now starting. Meanwhile some knowledgeable experts contend that many of the elderly and infirm could receive better and less-costly care if smaller facilities were developed in each of the city's neighborhoods, more reflective of the cultural flavor and needs of the residents and more conducive to frequent visits by families and other loved ones. Surely it would be a better use of Bldg 1801 and/or 1100 to convert either (or both) to long-term health care facilities for the aged and disabled instead of the creation of mountains of concrete and reinforced steel rubble.

C. **CLOSURE OF MANY HOSPITALS.** With the heavy commercialization of medical care and the growing competitiveness of for-profit HMO's, many hospitals (throughout the United States) have been shut down during the past few years (since 1994). And there are now reports of impending **SHORTAGES** of hospital beds within the San Francisco Bay area.

D. **SWING SPACE.** In any of the scenarios -- whether Laguna Honda and specific acute-care hospitals are rebuilt (at same location) or dispersed to smaller (new) facilities -- there will probably be an extended transition period of 5-10 years when patients will need to be diverted to other facilities while major construction is ongoing. Again, with minimal costs possibly either 1801 or 1100 could be restored to active status to relieve this probable crunch, scarcity of hospital beds. 10-3

E. **"ISSUES WHICH ARE RIPE FOR DISCUSSION."** Per discussion on the required scope of the revised Environmental Screening Form (ESF) continued in Appendix A of the April 1999 Draft EIS, the NEPA encourages the use of "tiered," non-repetitive, documents. Based upon the plethora of recent newspaper articles on the present tumultuous state of both short-term (acute) and long-term (chronic) medical care facilities in the San Francisco Bay area, it appears that this is an issue now ripe for discussion in the amended and/or updated EIS.

I personally do not profess to know what the final outcome of such an analysis might be, but the door should be kept open for the possible establishment of a premier (world class), new publicly- owned facility for children somewhere on the Presidio (possibly in the Letterman Complex) which some authorities assert is "desperately needed." Having a world-class children's hospital as an anchor tenant at Presidio would greatly enhance its status as a National Park and recreation area!

The attached recent newspaper articles indicate that the time is "now ripe" for intensive investigation of health care issues in the EIS prior to demolitions of 1800, 1100 or 1110. See attached list of references.

4. **BIOMEDICAL RESEARCH (LAIR)**

The April 1999 Draft EIS purports to summarize a National Park Service funded Letterman Complex Assessment (BAR, April 1993). However, the Draft EIS (pages 57-58) provides only a biased, negative and distorted view of the reuse opportunities of these facilities. And no clear distinction is made between the "identified possible deficiencies" of LAMC and those of LAIR. 10-4

For example, by careful searching of the source document (BAR 1993) it seems that only the first bullet ("lack of light and air" on page 58) is applicable to LAIR. And that comment (by BAR) was apparently made only within the context of possible conversion of LAIR's animal rooms to office use (page 109).

Further, the Draft EIS fails to acknowledge the summary statements by BAR (pages 107 and 110) that:

* *"This structure is a massive building which cannot be easily demolished. It has been well used and should provide great value for the future if it continues to be used for the purposes for which it was designed. Its life expectancy is not forever but absent a significant seismic event, and assuming continued diligent maintenance and reasonable upgrading of systems as needed, its lifespan should be indefinite."*

* *"This (LAIR) is a specialized, well-built and well-maintained facility which would really be best-suited for the animal research it was originally designed for."*

* *"This facility (LAIR) has had some system upgrades as well over the years. Its structural system is probably adequate for current seismic requirements. In addition, the quality of the original workmanship is high, and the atrium spaces and associated circulation are very pleasant. It is, in short, well designed, well built and well maintained. Every effort should be made to find a future use in keeping with the high quality of the facility."*

The cost estimates by McLellan & Copenhagen (1992) and essentially confirmed by BAR (1993) were in the range of $28-65 per gross square foot ($12-44 million) to renovate LAIR. The differences in estimates were based upon various options (1, 2, 4 & 5) for functional distribution of the existing building (nearly 280,000 square feet) amongst Administration, Laboratory and Animal Facilities. These estimates ($28-65/SF) are incredibly "cheap" (a real bargain!) as compared to the $1,000/SF often estimated for new construction of comparable facilities.

10-4

Furthermore, some of the specific recommendations made by BAR in the 1992 and 1993 engineering studies related to a stand-alone steam/heating plant, HVAC chiller and emergency generator's fuel oil system (pages 113-115) have now already been completed (1998).

As part of the contemporary EIS, Trust's analysis needs to go beyond the bland statement (page 57) that "competition between small biomedic companies for lab space is strong, with the vacancy rate for research and development space in San Francisco below 1 percent". Doesn't this finding imply that there could be a great opportunity for leasing out LAIR essentially as is?

Furthermore, although UCSF has intensive ***PLANS*** for its 2.65 million square feet research center on the 43-acre Mission Bay campus, their proposed Animal Care Facility (16B) of 85,000-115,000 square feet (almost identical in size to LAIR) is not projected for completion until approximately the year 2020 as a component of UCSF's Phase 3 (UCSF "Mission Bay Campus Master Plan & Guidelines," April 1, 1999). Thus it would seem that perhaps the NPS/Presidio Trust's marketing efforts may not have been sufficiently aggressive in regard to finding a suitable tenant at LAIR.

Referring again to the Draft EIS (April 1999) on page 58, it appears that all other cited deficiencies (except the first) were taken verbatim from the list of significant deficiencies given by BAR (April 1993, page 3) for LAMC (not LAIR!), which were made in the context of evaluating conversion of this former general-purpose hospital (designed in the 1960's) into a state-of-the-art pediatrics hospital for the 21st century. A convincing case has indeed been made by the several engineering specialists (BAR 1993) that such a conversion would be very costly and probably not feasible. However the Trust's EIS should then address the fundamental question of what type of facility (children's hospital? hotel? film studio? general office building? shopping center? housing?) would be most desirable at this particular footprint (LAMC's) of this National Park.

5. **ACCESS TO PRESIDIO BY VISITORS TO THE "NATIONAL RECREATION AREA"**

Much of the discussion in Draft Supplement to the GMPA concerns traffic impacts within the Presidio itself plus the immediately-adjacent neighborhood (eastward of Richardson) when/if activities are resumed in the space now occupied by presently-inactive LAMC/LAIR. Presumably under any conceivable alternative (except total demolition of LAMC/LAIR and restoration of this 23-acre plot to its original "natural-state" -- grass and trees), there would, again, be significant traffic (automobile, truck, bicycle and pedestrian) into and out of Presidio via Lombard Street Gate -- comparable to what occurred during the time span of at least 60 years beginning in the 1940's as the Army's medical facilities ratcheted up to serve national needs during World War II. Thus it is probable that under any plausible scenario the recent lull (since Army's Base Closure of 1994) in Presidio Gate traffic will soon end. And quite properly the Amended EIS should address this and negotiate with the immediate neighbors some sort of satisfactory resolution to the traffic impacts upon this specific neighborhood.

However, while these ***NEIGHBORHOOD*** constituents -- including Cow Hollow, Marina, Pacific Heights, Richmond, etc. -- will have a pressing interest to maintain the status quo (since 1994) of minimal traffic in/out of Presidio, there must be strong advocacy for the fact that Presidio is being supported by the ***FEDERAL GOVERNMENT*** -- not by the CCSF nor by State of California nor by local neighborhood associations -- to serve as a ***NATIONAL*** Recreation Area. As a neighbor to the Presidio myself, I like the fact that I benefit from having a "big back yard" (the Presidio) which is largely undeveloped and provides me with great freedom to roam about and enjoy for my own personal benefit -- at no cost.

However, to be truly sustainable into perpetuity I believe the NPS and the Trust have an obligation to assure that this area is truly accessible to the ***GENERAL PUBLIC*** so that 10-50 years from now the Presidio will not be degraded into the status of a "special backyard" for its generally well-to-do immediate neighbors or a "special enclave" for the employees of NPS, Presidio Trust, plus its tenants, who enjoy exclusive access to this property as though they were somehow selected for inclusion in a privileged "country club." To prevent this undesired outcome of exclusivity, I believe that it's essential that the Planners include in the EIS and Planning Guidelines for the ***ENTIRE*** Presidio a thorough discussion of the actions that could/would be taken to ensure greater access by the General Public. Topics to be discussed should include: 10-5

A. **PRESIDIO EXITS (BOTH DIRECTIONS) FROM DOYLE DRIVE** -- under anticipated new alignments. Presumably this is now under a fairly advanced conceptual stage wherein the general public can review and comment upon alternatives.

B. **WATER TAXI AND/OR FERRY DOCK** -- Again, presumably the Planners can now share (within the EIS) how/where the docking facilities will be located (on Crissy Field Beach?) to permit water access to Presidio from San Francisco Airport, Ferry Building at end of Market Street, Fort Baker, Alameda, Treasure Island, Oakland, etc.

C. **BAY AREA RIDGE TRAIL.** A splendid concept, new since 1994.

D. **OPENING UP OF PRESENTLY-ABANDONED RAILROAD TUNNEL UNDER UPPER FORT MASON.** Once accomplished, this will permit visitors (pedestrians, bikers, joggers, skateboarders, wheel chairs) an unimpeded level path (no steep hills) along the entire San Francisco waterfront from China Basin, via Herb Caen Promenade, thru Fishermans' Wharf district, under Upper Fort Mason, along Marina Green and thence thru Crissy Field to Fort Point. Presently a typical tourist (who might be staying at a hotel near Union Square while attending a trade show at Moscone Center) would be inclined to use an automobile to visit Fishermans' Wharf and then again (second use of auto) to visit Presidio and/or Fort Point. By opening up the Fort Mason Railroad Tunnel, this route would probably join the Boston Freedom Trail and a "walking tour of Paris" as one of the world's finest non-polluting, environmentally-correct recreational activities, and would bring great credit to the GGNRA's and Trust's stewardship of these properties.

Richard Hansen *Richard T. Hansen*

Attachments:

References for Section #3E

"State's Hospitals on Shaky Grounds -- Costly Seismic Safety Codes May Force Some Out of Business," S.F. Examiner 1/31/99

"How Will the Bay Area Region Comply When It Comes To Seismic Safety," Regionwise, Newsletter for Catholic Healthcare West, March 1999

"Mt. Zion May Quit Acute Care -- Hints That S.F. Hospital Will Close Emergency Room," S.F. Chronicle 5/20/99

"Inpatient Care at Mt. Zion in Danger. Cutbacks Rumored at Mt. Zion," S.F. Examiner 5/20/99

"S.F. General Hospital Is Falling Apart, Workers Say," S.F. Chronicle 3/24/99

"Giant Grant for Children's Health Care" (expected to include a new health care facility in San Francisco for children), S.F. Chronicle 3/24/99

"Packard Grants Would Create Huge Children's Health Center," S.F. Chronicle 3/24/99

"New Hospital Likely to the City's Kids -- Packard Foundation Offers Funding to UCSF Stanford," S.F. Chronicle 3/24/99

"Fears of East Bay Hospital Monopoly -- Shutting Oakland's Kaiser Will Leave Sutter Dominant" (number of private hospitals in Berkeley and Oakland is set to plummet from five in 1992 to just one), S.F. Examiner 5/10/99

"AIDS Doctors in Quandary With Closure of Davies," S.F. Examiner 5/14/99

"Laguna Honda Plan Is a Boondoggle" (prefers smaller facilities in each of city's neighborhoods rather than a single mega facility "warehouse"), S.F. Examiner 5/15/99, Letter to Editor.

"San Francisco Needs Laguna Honda," S.F. Examiner 5/10/99

"Hospital Merger a Fiscal Horror Story -- UCSF Stanford Deal Hemorrhaging Money, Not Saving It," S.F. Examiner 5/24/99.

Responses to Comments in Letter 10

10-1

For response to the comment concerning the need for a comprehensive planning document and concerns with piecemeal planning, refer to master response 4A. For response to the comment concerning the need to provide alternative analyses on employee housing, hotel and/or senior housing, and office buildings, refer both to master responses 4A, 4B, and 6A.

10-2

The Presidio Trust shares the commentor's concerns for pedestrian safety on Gorgas Avenue, which are noted for the record. See master response 21 regarding Doyle Drive. Also refer to the Planning Guidelines in Appendix B of the Final EIS for design principles on access, circulation and parking.

10-3

As discussed on page A-9 of the Draft EIS, the impacts of the closure of LAMC/LAIR were analyzed in the Army Base Closure Final EIS. The 1994 GMPA EIS, Alternative D considered the continued use of LAMC as a hospital. Thus, the analysis of continued hospital use of LAMC is provided in those two documents.

The NPS issued an RFQ for reuse of the Letterman Complex in 1994 that received 16 proposals. From June 1994 through December 1994, NPS negotiated with the University of California, San Francisco without success for the university to reuse LAMC and LAIR for a medical research facility. In that RFQ process, two proposers suggested that LAMC be reused as a Veteran's Administration hospital. However, the Veteran's Administration itself did not indicate such an interest, nor did any other hospital user.

Later, NPS negotiated with the City of San Francisco Department of Public Health (DPH) for use of LAIR as laboratory and office space. The DPH is responsible for management of Laguna Honda Hospital and other city health care facilities, and has not indicated an interest in using LAMC to either NPS or the Trust. (DPH did evaluate re-use of the Public Health Service Hospital as a hospice/long-term care facility.) Note that to use LAMC as "swing space" for Laguna Honda or other needs for hospital use would require it be renovated to meet code requirements for hospital use.

Finally, notice of the RFQ for the Presidio Trust's planned development of the Letterman Complex was sent to area hospitals. None of the hospitals indicated any interest in re-using LAMC. For further response to these comments, please refer to master response 6A.

The commentor suggests that LAMC should be considered for long-term care for the elderly. Senior housing providers have expressed considerable interest in locating at the Presidio, particularly at the Public Health Service Hospital site. Alternative 3 includes a senior housing component within its tenant mix. Otherwise, none of the senior housing providers that expressed interest in the Presidio have inquired about re-using LAMC as a senior care facility.

10-4

In response to the comment, the text of the Final EIS has been revised to delineate which deficiencies apply to LAIR and which to LAMC. BAR (1993, in the Final EIS) cites a 1992 cost estimate range of $28 to $65 per square foot for renovation. The cost estimate range is for the re-use of LAIR as an institutional laboratory research facility. As discussed above, no users for such a research facility have been identified. Conversion to a multi-tenant research facility would have a significantly greater cost. Neither the market nor the public support the re-use of LAIR as an animal research facility.

For further response to comments concerning the scope of leasing opportunities available for the LAMC/LAIR facilities, please refer to master responses 6A and 2A and Sections 2.1 and 1.2 of the Final EIS.

10-5

The long-term goals and actions to improve public access to the Presidio are addressed in the 1994 GMPA EIS, from which this EIS tiers. Discussions of how each alternative contributes to these actions are provided in Sections 4.1.1.2 through 4.6.1.2 (Presidio General Management Plan Amendment) of the EIS.

Letter 11

STATE OF CALIFORNIA - BUSINESS, TRANSPORTATION AND HOUSING AGENCY GRAY DAVIS, *Governor*

DEPARTMENT OF TRANSPORTATION
P O BOX 23660
OAKLAND, CA 94623-0660
Tel: (510) 286-4444
Fax: (510) 286-5513
TDD (510) 286-4454

June 7, 1999

RECEIVED

SF-101-6.71
File No. SF101102

The NEPA Compliance Coordinator
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, Ca 94129-0052

Draft Environmental Impact Statement (DEIS) and Planning Guidelines for the Letterman Complex; The Presidio Trust; City and County of San Francisco

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the proposed Letterman Complex project at the Presidio in the City and County of San Francisco. We have examined the above-referenced document and have the following comments to submit:

1. It appears that the Letterman Complex project at the Presidio would involve potential improvements within the State Highway 101 right-of-way (ROW). We, therefore, request that the City submit either a Permit Engineering Evaluation Report (PEER) if the proposed project improvements within the State ROW cost less than $1 million, or a combined (PSR/PR) for project improvements costing over $1 million. 11-1

2. Caltrans has serious concerns about potential project traffic impacts to Highway 101 at Doyle Drive, Richardson Avenue and Lombard Street. Further, proposed improvements to Highway 101 raise the following traffic operations and safety issues that should be addressed:

   (a) The proposed reconfiguration of the new signalized intersection of Lyon/Street/Richardson Avenue/Gorgas Avenue would allow left turns into and out of the Letterman Complex. This would reduce the capacity on Richardson Avenue from three lanes to two lanes in both directions. As a result, traffic in the southbound direction would likely queue up in the AM peak period. The queue would extend back onto Doyle Drive blocking the mainline traffic. The traffic in the northbound direction is likely to queue up during the PM peak period. The queue would extend back to the intersection upstream of the proposed new intersection. 11-2

The Nepa Compliance Coordinator
June 7, 1999
Page 3

(b) The proposed new signalized intersection at Richardson Avenue/Gorgas Avenue would allow left turns from Gorgas Avenue to northbound Richardson Avenue. The left turns would require stopping southbound traffic from Doyle Drive to Richardson Avenue. This would result in a queuing effect on traffic on Doyle Drive. The queuing may end in the vicinity of the connector from Doyle Drive to Richardson Avenue where sight distance is limited and high-speed freeway traffic is unaccustomed to stopping. 11-3

Finally, please be aware that all activities that involve a need to perform work or implement traffic control measures within the State right-of-way (ROW), will require a Caltrans encroachment permit. To apply for an encroachment permit all applicants are required to submit a completed application with appropriate environmental documentation and five (5) sets of plans (in metric units) which also show State ROW to the following address: 11-4

G. J. Battaglini, District Office Chief
Office of Permits
Caltrans, District 04
P. O. Box 23660
Oakland, Ca 94623-0660

We thank you for the opportunity to work with you on this project. Should you require further information or have any questions regarding this letter, please call Nandini N. Shridhar, AICP, of my staff at (510) 622-1642.

Sincerely,

HARRY Y. YAHATA
District Director

By Jean C. R. Finney

JEAN C. R. FINNEY
District Branch Chief
IGR/CEQA

Responses to Comments in Letter 11

11-1

Because costs for project improvements are expected to exceed $1 million, the Presidio Trust will submit a combined PSR/PR for review and approval by Caltrans.

11-2 AND 11-3

See master response 18.

11-4

Upon development of plans for the intersection, and if required, the Presidio Trust would apply for a Caltrans encroachment permit or other necessary permits.

Letter 12

GOLDEN GATE BRIDGE, HIGHWAY AND TRANSPORTATION DISTRICT

June 11, 1999

JUN 14 1999
RECEIVED

NEPA Compliance Coordinator
Letterman Complex
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

To Whom It May Concern:

Re: **Draft Environmental Impact Statement (DEIS) for New Development and Uses within the Letterman Complex/A Supplement to the 1994 General Management Plan Amendment for the Presidio of San Francisco, San Francisco, California**

Golden Gate Bridge, Highway and Transportation District (District) has reviewed the above referenced document and provides the following comments as they pertain to impacts on the Golden Gate Corridor and Golden Gate Transit. District did not review the "Presidio Letterman Complex Transportation Technical Report" (by Wilbur Smith Associates) and recognizes that some of the following comments may be addressed in that document.

GOLDEN GATE CORRIDOR IMPACTS

U.S. Highway 101 is the principal route between San Francisco and the North Bay. Along this route, District operates the Golden Gate Bridge and Doyle Drive. As such, District is concerned with any proposal that may potentially affect traffic and transbay bus operations on the Golden Gate Bridge, Doyle Drive, Richardson Avenue, or Lombard Street.

1. DEIS states the primary vehicular entrance to the Letterman Complex will be either the "Lombard Street Gate" (intersection of Lombard and Lyon streets) or a reconfigured "Gorgas Avenue Gate" (intersection of Gorgas and Richardson avenues). DEIS (page 94) estimates between 220 and 650 afternoon peak hour vehicle trips for Alternatives 1 through 6. 12-1

   Despite the project site's vicinity to U.S. Highway 101, DEIS has limited its evaluation of traffic impacts to seven or eight intersections "nearest the Letterman Complex." Specifically, DEIS evaluates only one intersection (i.e., Lyon/Richardson/Gorgas) along U.S. Highway 101.

   It would be informative if the DEIS addressed traffic impacts along U.S. Highway 101 (i.e., Golden Gate Bridge, Doyle Drive, and key intersections on Lombard Street) resulting from the proposed alternatives.

BOX 9000, PRESIDIO STATION • SAN FRANCISCO, CALIFORNIA 94129-0601 • TELEPHONE 415/921 5858

NEPA Compliance Coordinator
June 11, 1999 Page 2

2. In general, morning peak hour traffic volumes typically are more pronounced than afternoon peak hour volumes. Can the afternoon peak hour evaluation be extrapolated to estimate what traffic impacts might be expected during the morning peak hour? 12-2

3. DEIS presents existing (Table 4, page 66) and projected (Table 16, page 96) traffic levels-of-service (in terms of delay) for the six project alternatives, for eight intersections. Since "existing" traffic volume-to-capacity ratios are not presented in Table 4, it is not possible to ascertain the change in volume-to-capacity ratios at these intersections by the project alternatives. 12-3

4. DEIS states (page 83) traffic "impacts would be avoided by implementing intersection improvements at 3 locations." Comparing "existing" with "2010 weekday" traffic delays in Tables 4 and 16 (pages 66 and 96, respectively), it appears delay at the Richardson/Francisco intersection would increase from 9.2 seconds/vehicle to 31.0 seconds/vehicle for Alternative 1. How has this impact been mitigated in the DEIS? Under the "2010 weekday" conditions, is it reasonable to assume this intersection will experience an average delay of 33 seconds/vehicle while virtually operating at capacity (i.e., volume-to-capacity ratio of 0.99)? 12-4

5. DEIS projects (page 93) approximately 17 percent of (home-to-work) trips to the project site will be from the North Bay. Alternative 5 calls for a "Digital Arts Center". Since several of the employers associated with this alternative are presently located in San Rafael, is it realistic to assume all North Bay home-to-work trips to the project site will be at a consistent 17 percent level among the six project alternatives? 12-5

6. Table D-6 (page D-7) shows 14 percent and 24 percent of employee/visitor trips from the North Bay and East Bay, respectively. Considering U.S. Highway 101 freeway accessibility of the project site, what proportion of East Bay vehicular trips can be anticipated to access the Letterman Complex via the Richmond-San Rafael and Golden Gate bridges? 12-6

7. Table D-7 (page D-7) indicates the majority of the Letterman Complex traffic will access the Presidio via the Gorgas Gate. How many of these trips will be on Doyle Drive? How many will be on the Golden Gate Bridge? 12-7

8. Alternatives 1 through 5 propose reconfiguration of the existing Lyon/Francisco/Richardson intersection, and create two new signalized intersections on Richardson Avenue. Figure 14 (page 109) appears to indicate two northbound through lanes at the "New Letterman/Exploratorium" signalized intersection and three northbound lanes (i.e., one left turn, one through, one right turn lane) at the "New Gorgas/Richardson" signalized intersection. Is this interpretation correct? What are projected levels-of-service for the new intersections during morning and afternoon peak hours? 12-8

9. DEIS states (page 108) that Alternative 6 "would not include any changes to intersections or roadways in the area." However, Figures 10 and 11 (pages 44 and 50, respectively) illustrating "Alternative 6" and "Existing Conditions" both indicate alignment changes to Lyon/Francisco/Richardson and Lyon/Gorgas/Richardson intersections. What changes, if 12-9

any, are anticipated for Alternative 6? What are the projected levels-of-service for these intersections during morning and afternoon peak hours? 12-9

10. DEIS states (page 36) "Presidio Trust would coordinate with the development team responsible for implementing improvements...to reconfigure the (Lyon Street, Richardson Avenue, Gorgas Avenue) intersection." Given potential impacts along U.S. Highway 101 and to Golden Gate Transit (GGT) bus service, District requests to be consulted during coordination efforts. 12-10

11. Given average travel speeds on Doyle Drive and the potential limited sight distance created by "New Letterman/Exploratorium" signalized intersection for southbound motorists, have appropriate considerations been given to traffic safety on Doyle Drive? 12-11

GOLDEN GATE TRANSIT IMPACTS

Golden Gate Transit serves the Letterman Complex at the existing coach stop located at the Richardson Avenue and Francisco Street intersection. This stop is shared with San Francisco Municipal Railway (Muni) routes 28, 76 and 91, and Golden Gate Club Bus service to Sonoma Valley (see below). Southbound Richardson Avenue stop, located between Francisco and Lyon streets, is 76 feet in length. Northbound Richardson Avenue stop, located between Francisco and Baker streets, is 112 feet in length. The northbound stop is a major internal transfer point on the GGT network permitting patrons to transfer between Financial District and Civic Center routes. Both stops have shelters. 12-12

12. Figures 13 and B-24 (pages 65 and B-46) do not correctly reflect above bus stop locations on Richardson Avenue.

13. DEIS (page 94) estimates from 590 to 1,710 new daily transit trips, and 60 to 200 new afternoon peak hour transit trips for Alternatives 1 through 6. DEIS assumes all transit trips to be accommodated on six Muni bus routes. By claiming the "maximum load points on (these) Muni lines" are "far away and opposite to the Presidio commute direction," DEIS thereby concludes these Muni routes have "existing capacity available to accommodate transit passengers."

    District would appreciate DEIS identifying potential impacts to GGT operations, in light of the following issues. These issues include: projected proportion of trips between the North Bay and the project site (approximately 17 percent, as stated on page 93); potential relocation of office workers from Marin County (for some alternatives) to the Letterman Complex; extensive service provided by GGT along U.S. Highway 101; and, the immediate vicinity of the project site to the existing GGT bus stop at Richardson Avenue and Francisco Street. 12-13

14. DEIS correctly states (page 110) that a criteria to assess the degree of transportation impacts includes "whether the alternative would exceed existing transit capacity." Given this DEIS criteria and GGT's "maximum load point" to be approximately at the toll plaza of the Golden Gate Bridge for transbay bus service (during morning and afternoon peak periods), an increase in passengers to the Presidio could be a significant impact for GGT. 12-14

NEPA Compliance Coordinator
June 11, 1999 Page 4

As you may know, bus ridership is not evenly distributed among all GGT bus trips. Therefore, even a small increase in passengers may generate additional standees and could be a significant impact from an operational perspective. An impact assessment requires distribution of new transit riders over existing GGT bus routes or trips. District is prepared to facilitate this analysis by providing current bus loading information. 12-14

15. No mention is made of Golden Gate Club Bus service to and from the Sonoma Valley under "Public Transportation" section of the DEIS (page 60). Club Bus is a subscription transit service. District provides financial assistance to Club Bus services across the Golden Gate Corridor. Currently, there are three Club Bus trips from the Sonoma Valley to San Francisco's Financial District and Civic Center. These buses operate during the weekday peak period and serve the project site at the existing Richardson Avenue and Francisco Street bus stop. 12-15

16. DEIS presents schematic street layouts (Figures 5 through 10, pages 19 through 44) for each Alternative. Each figure shows a reconfigured layout of the Lyon/Francisco/Richardson intersection. Each figure should also indicate the recommended location of coach stops on Richardson Avenue. 12-16

17. Figure 14 (page 109) illustrates cut outs for Richardson Avenue coach stops. DEIS claims these cut outs will be incorporated as part of Alternatives 1 through 5. Can they also be incorporated into Alternative 6? How many linear feet will be provided? What passenger amenities are to be provided? 12-17

Thank you for the opportunity to comment on this Draft Environmental Impact Statement. Please call Principal Planner Mr. Maurice Palumbo at (415) 257-4431 if you have questions.

Very truly yours,

Jerome M. Kuykendall
Director of Planning
and Policy Analysis

JMK:ke
c: Celia G. Kupersmith
Wayne T. Diggs
Maurice P. Palumbo
a:c:\msword\bus\letterman.deis.069

Responses to Comments in Letter 12

12-1

The intersection at Richardson Avenue and Lyon/Francisco streets is the only intersection that would be significantly affected by any of the proposed alternatives. However, in response to the comment, additional analysis was conducted to estimate forecast project-related traffic increases on the Golden Gate Bridge:

TIME PERIOD	TRAFFIC DUE TO ALT. 5	GG BRIDGE TRAFFIC	% INCREASE
p.m. Peak Hour	57	8,700	0.7
Daily	612	117,000	0.5

The above table was developed using traffic from the preferred alternative and indicates that any increases on the bridge would be very small and not have a significant impact on bridge traffic and congestion. In addition, the traffic above and in the Draft EIS does not factor in any reduction in traffic from San Francisco to Marin County (where the preferred alternative proponent is currently located) and so overstates the overall impact and is therefore conservative.

12-2

Traffic counts conducted in January 1999 indicate that the p.m. peak-hour traffic volumes were higher than a.m. peak-hour traffic volumes. Capacity analyses were conducted for each of the five study intersections, and it was found that the average delay per vehicle was generally greater during the p.m. peak hour. Thus, after the p.m. peak hour was determined to be the more critical of the two commute time periods, the capacity analyses were carried forward for the p.m. peak hour only.

In particular locations where it was determined that a.m. peak-hour conditions would be the more critical of the two scenarios, the capacity analyses was conducted for the a.m. peak hour as well. This was true for the new intersection(s) proposed on Richardson Avenue. With an a.m. peak-hour southbound traffic flow that would be unregulated by upstream intersections, the conflict between the northbound left-turn movement into the Presidio and the southbound through movement was apparent.

In general, signalized intersections distribute the green light time proportionally to the volumes on each approach, which in effect balances the delay for each vehicle on each approach. However, in some instances the delay per vehicle on the minor approaches to an intersection will be higher than for those vehicles on the major approaches to the intersection. At the new intersections on Richardson Avenue, the delays for the minor approaches would not be substantially higher than for the major approaches, because the times allowed for pedestrians to cross Richardson Avenue are more critical than the time needed for the vehicular traffic on the minor approaches.

12-3

In response to the comment, Table 4 has been revised to include critical volume-to-capacity ratios.

12-4

The increase in delay from 9.2 seconds per vehicle to 31.0 seconds per vehicle would not be considered significant. At intersections for which traffic volume is largely comprised of commute traffic, such as intersections on Richardson Avenue, it is not uncommon to experience volumes that are very near capacity. Commute traffic typically has characteristics that yield effective traffic flow, such as drivers that are familiar with the roadway and higher density of vehicles. Volumes that are very near capacity but with high flow rates indicate that traffic is moving through the intersection efficiently.

12-5

The information on the geographic distribution of trips was obtained from recent surveys at the Presidio, and consistently applied to all alternatives. This average distribution is appropriate for use where detailed information on the actual distribution is not available. While some variations in origins and destinations are likely between the alternatives, on average, the use of these assumptions will result in similar analysis results. Based on discussions with the proponent of the Digital Arts Center alternative on anticipated travel characteristics of their employees at the Letterman Complex, the actual geographic distribution is not expected to be different than that analyzed in the EIS.

12-6

Some of those traveling between the site and northern cities in the East Bay may use the Richmond-San Rafael and Golden Gate bridges. However, due to the small number of vehicle trips estimated to originate or end in these areas, the EIS traffic assignment did not assume that any vehicle trips would travel between the site and the East Bay via the Richmond-San Rafael and Golden Gate bridges. The East Bay traffic entering the Gorgas Avenue Gate was assumed to turn left from northbound Richardson Avenue into the site, and traffic leaving the Gorgas Avenue Gate was assumed to turn right onto southbound Richardson Avenue. This traffic was assigned in this way in order to allow a conservative analysis of the proposed new intersections on Richardson Avenue. Because the conflict between the northbound traffic turning left into the site and the southbound through traffic on Richardson Avenue is the critical conflict of the intersection's operation, it was important not to underestimate the magnitude of this conflict.

12-7

Of the 260 project-generated vehicles entering or exiting the Gorgas Avenue Gate during the p.m. peak hour, 19 would be traveling southbound on Doyle Drive to the gate and 54 would be traveling northbound on Richardson Avenue and Doyle Drive from the gate during the p.m. peak hour. Of these vehicles, an estimated 13 and 44 would be traveling to and from the North Bay via the Golden Gate Bridge, respectively. The remainder would travel to and from Park Presidio Boulevard through its interchange with Doyle Drive.

12-8

Figure 14 of the EIS is intended to represent available turning movements at the proposed new intersections, but does not reflect the number of lanes assigned to each of these movements. In response to the comment, Figure 14 has been revised to indicate the number of lanes. The projected levels of service for these two intersections during the p.m. peak hour are indicated in Table 18 of the EIS.

12-9

Figures 9 and 10 incorrectly depicted the proposed intersection geometry for Alternative 6 and Existing Conditions. In response to the comment, these figures have been corrected to illustrate the roadway geometry that exists today. The discussion on page 108 to which the commentor refers is correct. Alternative 6 would not include any changes to intersections or roadways in the area. The projected levels of service for the intersection(s) on Richardson Avenue in the year 2010 are indicated in Table 18 of the EIS.

12-10

The Presidio Trust will prepare a project study report (PSR) for Caltrans on proposed intersection configurations (see master response 18). During this process, the Presidio Trust would coordinate with the agency to keep it informed of key meetings and any issues that affect bus service and stops.

12-11

Refer to master response 18.

12-12

In response to the comment, Figures 12 and B-24 have been revised to reflect the current bus stop locations.

12-13

The project's ridership impacts to Golden Gate Transit are summarized in the response to comment 12-14. In response to the comment, new text has been added to the Final EIS which provides an analysis of the impact on Golden Gate Transit's "maximum load point."

With regard to the potential relocation of office workers from Marin County, see the response to comment 12-5.

The proposed new intersections on Richardson Avenue would likely cause Golden Gate Transit buses traveling through these intersections to incur slightly more delay than they do currently.

With the proposed new intersections on Richardson Avenue, the bus stop located at the intersection of Richardson Avenue and Francisco Street would be relocated northward to a location near the Exploratorium, as shown in Figure 15 of the Final EIS.

12-14

The average passenger load on Golden Gate Transit transbay buses during the a.m. and p.m. peak hours is about 30 passengers per bus, and there are about 120 buses per hour during the a.m. peak hour and about 110 buses per hour during the p.m. peak hour for about 23 different transbay routes. The six alternatives would generate between 9 and 26 transit trips to the North Bay in the p.m. peak hour. If these project-generated passengers were distributed across the 23 Golden Gate Transit routes proportionally to the existing distribution of passengers across routes, the project would add a maximum of three passengers to each route. Even if all of the passengers added to a single route were on the same bus, the estimated passenger load would not exceed the bus capacity for any one line.

12-15

In response to the comment, a description of the Club Bus service has been added to the end of Section 3.9.3, Public Transportation, within the Final EIS.

12-16

In response to the comment, these figures have been revised to indicate proposed locations of bus stops.

12-17

The coaches stop "cut-outs" depicted in Figure 15 are part of the proposed intersection improvements for Alternatives 1-5. Since Alternative 6 would include minimal site improvements, the current bus stops would not be changed. The number of linear feet and passenger amenities would be determined through consultation with Golden Gate Transit during preparation of the PSR.

Letter 13

Thoreau Center
Partners, L.P.

JUN 14 1999
RECEIVED

June 9, 1999

NEPA Compliance Coordinator
Attention: Letterman Complex
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

RE: Comments on Draft Environmental Statements for New Development and uses within the Letterman Complex/A Supplement to the 1994 General Plan Amendment EIS for the Presidio

Dear Sirs and Madams:

The purpose of this letter is to identify and put on record the Thoreau Center Partners' concerns related to the proposals for redevelopment of the Letterman-Lair Complex, now under consideration by The Presidio Trust. We have focused our review of the draft EIS to planning, urban design, environmental, and transportation issues as they directly affect the operation and program mandate of the Thoreau Center for Sustainability, which is the adjacent and most immediate neighbor to the proposed project. Our comments also consider the impact of the proposed projects on the Presidio, in general, as envisioned in the General Plan Amendment.

The Thoreau Center for Sustainability is currently the Presidio's largest multi-tenant project, serving as the home to over 50 non-profit organizations and several businesses. The Thoreau Center was created in order to foster a community of non-profit organizations dedicated to realizing the programmatic vision of the General Management Plan. The Thoreau Center represents a $13 million private sector investment in the Park and has become a model for historic rehabilitation and sustainable development throughout the United States.

We welcome a new neighbor on the Letterman-Lair Complex site and look forward to working with The Presidio Trust and the selected tenant on the future redevelopment of the area. However, it is imperative at this time that we ensure that the project will not adversely affect our ability to operate the Thoreau Center. We need to be able to represent to our tenants and lenders that the Thoreau Center will continue to be an historic landmark set in an historic district, with minimal impacts from redevelopment and increased parking and traffic.

The following list of concerns is based on our review of the draft EIS and attendance at several public meetings. We request that, as a neighbor and Park Partner, we continue to be kept informed about the project and reserve the right to continued involvement in the planning process.

244 California Street, Suite 400, San Francisco, CA 94111 415 263-2750 Fax 415 263-2759

Thoreau Center

The draft EIS is a reasonable statement of potential impacts, but it does not go far enough in analyzing either the parking or traffic issues. Further, we have significant concerns about the functionality of the proposed traffic mitigation measures.

A. Evaluation of Parking

The degree to which the Letterman proposals will satisfy their parking demand is crucial to the Thoreau Center because parking will become extremely limited in the area, once the project is completed. If the selected Letterman Complex proposal does not accommodate its internal parking demand, the overflow will affect parking available to the Thoreau Center.

The draft EIS indicates that the Shorenstein proposal would provide 1,390 parking spaces, while the demand would be for 1,200. The document indicates that the Lucas proposal would provide 1,530 spaces while demand would be for 1,260. These computations indicate that sufficient parking would be provided by both proposals. However, we believe that additional work should be done by the eventual project sponsor to confirm these estimates. The estimates in the draft EIS were performed in accordance with the "San Francisco Guidelines for Environmental Review", as is required for all projects undergoing an environmental review in San Francisco. Those guidelines are based on generic development types, and many varying types of development are aggregated into land use categories, each with their own prescribed trip generation and parking rates. Both the Shorenstein and Lucas proposals are very specific proposals, and data is available that would allow a better estimate to be made of both trip generation and parking. In particular, if the Lucas project operates with a scenario where major filming projects are worked on with a high level of intensity and long hours over a concentrated period, there could be spikes in the parking demand that exceed the averages used in the draft EIS analysis. 13-1

We believe that a parking demand analysis more closely tied to the known and expected uses in each specific proposal would produce a higher level of confidence that the parking demands will in reality be satisfied by the proposal supply. Such an analysis should be carried out as part of the Final EIS.

The project should not start construction until the approval of a detailed parking management plan. Such a plan would establish the parking areas that The Thoreau Center currently depend on as being allocated specifically for the Center's use.

Parking management plans accompanied by significant improvement in public transit alternatives for employees and visitors to the new Letterman-Lair Complex project will need to be more detailed before we can fully understand the potential impact of the proposed project on the Thoreau Center and other surrounding Park Partners. We intend to work closely with the Trust and the selected developer on the plans and the development of enforceable provisions in the lease that restrict parking

Thoreau Center

to the project site and mitigate use of adjacent areas, including Thoreau, for visitor parking. 13-1

B. Evaluation of Traffic Issues – Access and Major Arterias

The major issue for the Letterman proposal, for the Thoreau Center, and for the Presidio as a whole is access. Access to the Presidio is tightly constrained, and both the Shorenstein and Lucas proposals will add a significant level of traffic. The possible effect on the Thoreau Center is that if the access is not sufficiently well designed for the Presidio as a whole and for the Letterman project as one of its principal generators, that patrons of the Thoreau Center will have difficulty getting in and out of the site. In the following paragraphs, we comment on the work performed in the draft EIS, other ongoing work in the vicinity regarding Doyle Drive, and a general comment on the nature of access to the Presidio. 13-2

The draft EIS has recognized this access issue and includes two principal proposed improvements for access to the site. One proposal would be to install a traffic signal at Lombard and Lyons Streets and to restripe the Lombard Gate entrance to provide for an additional left turn lane leaving the Presidio: Figure 15 on Page 112 of the draft EIS documents this proposal. The second mitigation would be a major redesign of the Gorgas gate entrance, creating a second intersection to serve traffic to and from the ramps leading to and from Doyle Drive. Figure 14 on Page 109 documents this proposal.

Lombard Gate

Of the proposal to widen the Lombard gate, we are concerned that it will not work as efficiently as implied by the results of the draft EIS. The 33 foot width is not sufficient space in which to fit three lanes in two directions. Some of the large vehicles entering the Presidio are virtually certain to strike the historic Gate Columns. Further, the proposed length of the left turn lane, approximately 30 feet, is not sufficiently long enough for the turning movements currently observed, and therefore not long enough for the projected volumes in the future. 13-3

Gorgas Gate

With regard to the more complex Gorgas Gate, the Wilbur Smith team is to be commended for developing a creative solution to this complex problem. However, we believe the analysis falls far short of determining whether the proposed solution will actually be able to function effectively. The analysis goes only far enough to determine that the creation of the added intersection would produce acceptable levels of service at both of the proposed Gorgas Gate intersections. However, these two Richardson Avenue intersections are very close to intersections on Gorgas Avenue. The interface between the Richardson Avenue intersections and the Gorgas Avenue intersections has not been analyzed to determine if there is sufficient storage 13-4

Thoreau Center

space, how the controls would be established on the internal roadways, and how access between the two proposals and these two intersections would work. We believe that this entire area should be analyzed as a system rather than as two separate intersections. 13-4

We also have these additional concerns about the feasibility of the Gorgas entrances:

1. We are concerned about the proximity of the new, northern intersection to be created on Richardson Avenue with respect to speeds of traffic coming off of the Doyle Drive/Bay Street Interchange. Traffic levels approach 45-55 mph in the location proposed for the new intersection. We are concerned about safe stopping distance and the potential for rear-end accidents if the interchange is retained in its current configuration. 13-5

2. The proposed new intersection is intended to have an access-way that passes between two existing buildings in the Presidio. While not a fatal flaw, we are concerned about a slight difference in grade between Richardson Drive and the existing passageway. We are also not certain that the passageway is sufficiently wide enough to provide for two traffic lanes and continue to provide existing pedestrian access to the two buildings; both buildings currently have doorways that lead to this passageway. 13-6

3. Any modification to Richardson Avenue will require the approval of Caltrans, since this roadway is designated as US 101, a State Highway. It is not clear that this approval will be obtained simply through the draft EIS process. If Caltrans approval is not obtained, significant congestion could be anticipated for all vehicles attempting to enter and leave the Presidio at this location, and some congestion could be expected to spread to other points as well. 13-7

The two alternatives have somewhat different internal roadway systems, and it is crucial to the feasibility of the proposals for the Gorgas entrance that each proposal be analyzed separately with regard to the "Master" proposal for Richardson Avenue. This has not been done. We are concerned that Shorenstein proposal includes a proposal for a very severely angled approach of an internal roadway to the extension of the roadway for the new intersection. Access to the Thoreau Center would probably use this roadway for much of its access. We would expect sight distance problems to possibly occur at the intersection of Gorgas and this new roadway. The Shoresntein proposal leaves untouched the complex Gorgas/Lyon/Richarson intersection, which is handled better by the Lucas proposal; this is a fine-scale detail that should be worked out as the project evolves. 13-8

The Lucas proposal appears to have very limited entrance/exit capacity, particularly from the Gorgas gate. Any congestion at this entrance-point would impact users of Thoreau Center and other users of the Presidio. The Lucas proposal also cuts

Thoreau Center

O'Reilly Street off from Gorgas Avenue, meaning that people currently parking on O'Reilly and using the Thoreau Center would have a circuitous means of access and egress. Given the constraints on the Presidio's circulation system, alternative means of access and egress from Gorgas need to be provided. 13-8

C. Evaluation of Traffic Issues - Local Street System within the Letterman Complex

We are particularly concerned with the treatment of the historic roadway that forms the boundary between the Letterman Complex and the historic Letterman Hospital, (now the Thoreau Center). These concerns are presented below:

1. Torney Avenue should remain a minor one-way local street with no intersections or vehicle connections (including transit) to other streets within the new Letterman Project Area. Torney runs right next to the historic Letterman Buildings 1012-1014 (now the entrances to Tides and the Energy Foundation) and Building 1000. In fact, it is physically adjacent to the edge of these buildings. Any increase in traffic on this road will create a significant hazard to pedestrians accessing these buildings and will negatively impact current uses of the buildings. Any changes to the configuration of the roadway will significantly affect the historic landscape and character of these pavilion style buildings set in a park-like landscape. 13-9

2. O'Reilly Street should remain a minor one way street in the Presidio grid system. This local street provides access to the entrances of Buildings 1000-1004, and is the location for the required non-exclusive parking for these buildings. Historically it has always been a narrow "residential" street. It should not become a collector or access street to new streets within the Letterman Complex Project Area. It also should not provide access to parking within the Letterman Complex Project Area, or serve as a drop-off, pick-up, or service to either residential or office complexes in the Letterman Project Area. 13-10

3. General Kennedy Avenue should remain a minor one-way couplet with no widening or increase in traffic. It is an important roadway for emergency vehicle access to Buildings 1000-1004 and 1007-1009. The east side of the couplet provides required non-exclusive parking spaces for Buildings 1000-1004. In addition, any increase in traffic would create a pedestrian hazard, due to the high historic hedges adjacent to the roadway that block visibility to the street. We were required to preserve these hedges as part of the cultural landscape. An increase in traffic would create a division between the O'Reilly Street houses and the Thoreau Center, losing the cohesive character of the historic complex. 13-11

Thoreau Center

D. Evaluation of Planning and Urban Design Issues

1. Setbacks along O'Reilly should be a minimum of 50 feet, in order to minimize the impact on the historic character of this street and Buildings 1000-1004. Massing should be minimized from the set back line by stepping back from 2 to 3 floor elevations in order to maintain the character of the existing streetscape on O'Reilly, which is historically a 2- 3 story neighborhood of wood frame houses. The massing of the Shoresntein proposal along O'Reilly Street is certainly more respectful on the historic officers' houses than the Lucas proposal. The massing of the 5-story buildings in the Lucas proposal completely negate the historic character of O'Reilly Street. 13-12

2. The massing and building wall along O'Reilly should allow for views and pedestrian access through the site to major open spaces in the Letterman Complex Project site. In all cases, the buildings should be designed to allow for easy pedestrian circulation between the Thoreau Center's public spaces and circulation system and the major public spaces in the new Letterman Complex. 13-13

E. Environmental Issues

1. Demolition and deconstruction of the existing Letterman-Lair Complex needs to be tightly contained and monitored. We look forward to reviewing detailed conditions in the final lease documents regarding restricted hours for demolition and excavation activities, truck circulation and access, the location of staging areas, location of construction employee parking, and general issues related to construction activities. No truck access should be permitted on or along O'Reilly Street, General Kennedy and Torney Avenues. These streets are too narrow and the turning radii are too tight to allow them to be used for construction level activities. In addition, there are numerous alternative approaches to the Letterman Complex Project site. We also expect that construction employee parking will be restricted to the Letterman Complex Project site. 13-14

2. We know from our own operating experience in the Presidio that it is critical to develop a direct and efficient link between the Presidio and BART. This particular linkage is not well addressed by the proposals. While there are potential linkages with the use of Golden Gate Transit, we believe that the best and most viable linkage will be with shuttles that leave directly from the new Letterman Complex project. Thoreau Center Partners is interested in participating in any program that will minimize the use of the private automobile in this area of the Presidio. 13-15

Thoreau Center

F. Compliance with the General Plan Amendment

The Draft EIS outlines a number of potential patterns of use for the Letterman Complex. Our final comment is that any project chosen must comply with the programmatic vision and uses outlined in the General Plan Amendment. Such Compliance needs to be detailed in final lease documents for the project. 13-16

Thank you for this opportunity to put on record our concerns.

Sincerely,

Tom Sargent
Managing General Partner

Drummond Pike
President, Tides Foundation

Responses to Comments in Letter 13

13-1

Regarding parking supply/demand calculations, see master response 20. In response to a second point in the comment, the preferred alternative is for office-type uses, not for filming. As in most businesses, there would be concentrated periods where deadlines require more intense work schedules, but that would impact the hours of parking, not the number of spaces.

13-2

This comment is an introduction to more specific comments, and responses to those comments that follow. Please refer to the responses to comments 13-3 through 13-8.

13-3

Lane widths of 11 feet are not uncommon in San Francisco. For example, lanes on Richardson Avenue are approximately 10 feet wide. It should be noted that large vehicles would not be turning into the Lombard Street Gate since vehicles weighing more than 3,000 pounds are prohibited on Lyon Street. However, it is possible that large vehicles traveling straight through on Lombard Street could strike the gate columns. The potential for this occurrence, and measures to further protect the historic gate post, would be considered as part of a detailed traffic signal and striping plan developed for the intersection of Lombard and Lyon streets (Please refer to mitigation measures TR-2, *Lombard Street/Lyon Street Intersection Improvements*, and TR-5, *Construction Traffic Management Plan*).

Under the preferred alternative in the year 2010, approximately 340 vehicles are projected to be leaving the Presidio and turning left from Lombard Street to Lyon Street. This left-turn volume would produce a queue of five vehicles during the p.m. peak hour. As Lombard Street is sufficiently wide to lengthen the left-turn lane beyond 30 feet if necessary, the length of the eastbound left-turn lane could be extended if necessary.

13-4

The two intersections along Richardson Avenue were analyzed as signals that are coordinated to favor the progression of southbound vehicle flow during the a.m. peak period and favor the progression of northbound traffic during the p.m. peak period. The two new intersections along Richardson Avenue were analyzed because they would be the most critical intersections to ensuring effective traffic flow into and out of the Presidio. The intersections along Gorgas Avenue would receive substantially less traffic, and therefore, could be coordinated to work with the intersections along Richardson Avenue. Traffic entering Gorgas Avenue from Richardson Avenue at the new intersection would have a free right turn onto Gorgas Avenue westbound, while traffic on Gorgas Avenue would be stop-sign controlled. A similar free left turn would be provided from Gorgas Avenue westbound into the planned garage entrance for the Letterman Complex development. This network of stop signs and free turns would ensure that traffic entering and exiting via the new intersections would not impact Richardson Avenue operations. Please refer to master responses 18 and 22.

13-5

Refer to master response 18.

13-6

The distance between the buildings is about 50 feet. Two lanes of traffic would require no more than 25 feet in width. Therefore, there should be sufficient space for pedestrian access to the buildings. The grade differential will be addressed in conceptual design and the Project Study Report. Refer to master response 23.

13-7

Refer to master response 18.

13-8

Refer to master responses 18, 21, and 22 regarding the current proposal and longer range access to the Letterman Complex.

13-9

No changes to Torney Avenue are anticipated under any of the alternatives. In response to the comment, new text has been added to the Access, Circulation, and Parking section of the Planning Guidelines in Appendix B to include a design principle to minimize traffic generated by the new development on smaller historic roads such as Torney Avenue, O'Reilly Avenue, and General Kennedy Avenue. See master responses 22 and 23.

13-10

No changes to O'Reilly Avenue circulation are expected under any of the alternatives. The character of O'Reilly Street as a historic residential street is recognized as an important feature and is identified for retention as an internal circulation corridor as well as accommodating for pedestrians and bicycles. The historic layout of the Letterman Complex street system is considered to be an important characteristic of the site's overall cultural landscape, and would be retained and rehabilitated as much as possible while meeting contemporary needs. Also, see master responses 22 and 23.

13-11

Changes to General Kennedy Avenue are not expected under any of the alternatives. As noted in the Planning Guidelines, the street would be retained as an internal circulation corridor. The streetscape's historic character, including its narrow width and historic landscaping, would not be affected. See master responses 22 and 23.

13-12

Please refer to master response 23 for a discussion of the O'Reilly Avenue setback.

13-13

Connections, both visual and physical, from the historic hospital complex to the new 23-acre development site are an important concept addressed in the Planning Guidelines, in Appendix B, specifically the design principles contained in the Land Use and Public Access section. These design issues would be carefully studied in the planning and design process, which would ensure that any undertaking is in keeping with the character of the historic district and the Planning Guidelines. Please refer to master responses 23 and 25 for Impacts on Public Access. Also, see mitigation measure CR-1, *Planning and Design Guidelines*, for details about the design development process.

13-14

See response to comment 6-2.

13-15

The Presidio Trust agrees on the importance of a good connection with BART, and improving such a connection will be part of the eventual TDM plan for the new development. Such improvement could come from upgrade of current MUNI service, possible contracting with Golden Gate Transit or through direct Presidio shuttles. As the TDM program is negotiated with the project proponent, the Presidio Trust will indicate the interest of the commentor in participating in such a program. In the interim, the Presidio Trust has been working directly with MUNI to upgrade its express service from BART and invites the organization and its tenants to utilize it.

13-16

For response to the comment concerning the need to comply with the programmatic vision and uses outlined in the GMPA, refer to master response 2A and Sections 1.1 and 1.2 of the Final EIS.

Letter 14

1

GOLDEN GATE NATIONAL RECREATION AREA
AND POINT REYES NATIONAL SEASHORE

ADVISORY COMMISSION

MINUTES OF THE ADVISORY COMMISSION MEETING
JUNE 15, 1999

[A verbatim transcript of this meeting is available for public review in the Office of Public Affairs and Special Events, GGNRA, Building 201, Fort Mason, San Francisco, CA 94123. The following is a brief summary.]

Meeting time: 7:30 to 10.00 p.m.
Location: Building 201, Fort Mason, San Francisco, CA

Present for the Advisory Commission:
Chair Rich Bartke, Vice Chair Amy Meyer, Michael Alexander, Mel Lane, Carlota del Portillo, Lennie Roberts, Merritt Robinson, Hank Sciaroni, Jack Spring, Ed Wayburn and Jacqueline Young.
Staff Liaison: Michael Feinstein.

Present for the Golden Gate National Recreation Area:
Acting General Superintendent and Presidio General Manager B.J.Griffin, Director of Strategic Planning Mike Savage and Realty Specialist Richard Lauthan.

Present for the Presidio Trust:
Executive Director Jim Meadows and Planning Manager Carey Feierabend.

Summary of Matters Discussed:

GGNPA ANNUAL REPORT

Commissioner Young, who is the Advisory Commission's liaison to GGNPA, introduced Greg Moore, its Executive Director. Greg, with the aid of a slide presentation, showed Commissioners how much the Association has done in the past year to support the park in four primary areas: education program support, park improvement and conservation projects, community and stewardship programs and, their largest project to date, the Crissy Field restoration project.

Presidio Manager B.J. Griffin thanked Greg and added their appreciation for the work that the GGNPA does. She said it was the best example of a partnership that GGNRA has.

MARIN HIGHWAY 1 TRANSPORTATION PLAN/BAY AREA WATER TRANSPORTATION PLAN

Strategic Planning Director Mike Savage said they are working on a transportation plan for the park, a parklands transportation task force in the region and a plan for Route 1 with Marin County and Caltrans. He is also working with the Bay Area Ferry Task Force on developing access to Fort Baker, Crissy Field and Fort Mason. He introduced two people from that task force, Sean Randolph and Ian Austin. Sean said a recommendation was released last April for the creation of a comprehensive water transit system for San Francisco Bay. A bill in the Assembly would create a Bay Area Water Transportation Authority to plan and design the

2

system. Ian described the routes, with the aid of slides, which would allow people to leave their cars and move around the Bay through a system of intermodel connections, and which would allow disaster recovery to take place if it became necessary. Chairman Bartke gave the web site for the plan: www.bayareacouncil.org, and said the matter would be coming back to the Commission for public input as progress is made, probably within the next 90 days.

PLAN FOR MARIN CELL SITE PROJECT

Realty Specialist Richard Lauthan said he is processing Cellular One's application for a cell site to be located on a light standard on Alexander Avenue in East Fort Baker. This will entail two antennas plus a utility cabinet screened by natural vegetation to be planted there, the power source coming from the Caltrans system that feeds the light standard. The public comment period will commence upon publication in the Marin Journal this week and will be open until July 21. NPS has developed proposed guidelines which should be finalized sometime in July. Richard added that although under the legislative and executive mandate they are required to process the applications, they are not obligated to approve every cell site.

Public Comment:

Patricia Vaughey (Cow Hollow Assn.) said Cow Hollow was a test case for cell antennas in the city and their group formed guidelines for the City and County of San Francisco. She invited staff to come and talk to her group and get the benefit of their experience.

SUPERINTENDENT'S AND PRESIDIO GENERAL MANAGER'S REPORT

In the absence of the Superintendent and Deputy Superintendent, B. J. Griffin talked about the In-park Partnership Conference held in May which brought land-managing agencies and their cooperating partners together to brainstorm ways to further their organizations. Fort Baker planning is continuing and progress is being made. There was a press conference on Angel Island announcing that the Immigration Station was chosen as a threatened historic resource. NPS is coordinating a study of the station's potential for a museum.

PRESIDIO TRUST DIRECTOR'S REPORT

Director Jim Meadows described the agreement reached with the Army which will result in an accelerated environmental cleanup of the Presidio. The Trust announced that the Board had chosen as its preferred alternative Lucas Film's Digital Arts Center, and will begin exclusive negotiations with them He announced the extension of the public comment period for 45 days, ending now in the first week of August. He said that not only has the Trust expanded the free DEIS copies available in public locations, but their offices are now open on Saturdays. The public comment period on the Presidio Vegetation Management Plan which began June 9 at the monthly planning workshop will continue throughout the summer, including the Advisory Committee meetings of July 20 and August 17. Improved Muni service to the Presidio has been negotiated, a map of which can be found at the Trust's web site: www.presidiotrust.gov, then click on "Directions." Two dozen interns from all over the US will be working for the Trust this summer. And, last, a collaboration between the Trust, NPS and U.C.Berkeley are conducting a Funston Avenue archeological research project on a site rich in the Spanish-colonial, Mexican-American period.

PRESIDIO LETTERMAN DRAFT EIS

Planning Manager Carey Feierabend gave an abbreviated history of the DEIS, culminating in the selection of the preferred alternative and the extension of the public comment period. She went on to describe the Digital Arts Center, the setting, the demolition of both buildings, the 2,500 employees whose housing would be accommodated within the Presidio and the 1,500 parking spaces underground. It is anticipated that a final EIS will be arrived at

3

sometime in late September or early October. She encouraged written comments which could be mailed to the Trust's mailing address, or sent to the web site at Planning@presidiotrust.gov.

Public Comment:

China Brotsky (Thoreau Center), as the most immediate neighbor, said she was concerned with parking and traffic issues, access and egress, the local street system, urban design, environmental issues and compliance with the vision and uses in the GMPA. 14-1

Brian Huse (NPCA) said the EIS violates the NEPA process and fails to provide a sense of how each alternative will contribute to or detract from a comprehensive vision for the park. Also, there is no analysis of the cumulative impacts to the park as a whole. 14-2

Johanna Wild (NRDC) is concerned that the choice of developer has been made before completion of the NEPA process, that the DEIS contains no information about a comprehensive management plan, and that the analysis of environmental and cumulative impacts is inadequate. 14-3

David Coggeshall complimented the Trust on a very professional and probably difficult selection process. He said he feels it is important to put out a message to the rest of the country and added that we are fortunate to have a partner such as Lucas to help to do that. 14-4

David Sibbet (Presidio Alliance) commended the Trust for extending the public comment period and was pleased that they want to continue receiving input around the design of the project. But input, he said, is not engagement. He encouraged the Trust to think a little bit beyond input as the only measure of what public involvement means. 14-5

Doug Kern (Urban Watershed Project) complimented the authors of the DEIS for mentioning the protection of Tennessee Hollow, then corrected them saying a check of the storm drain maps indicate that the Letterman storm drains do in fact go right to Crissy Field, a potential significant impact that should be reviewed in more detail in the final document. 14-6

Carolyn Blair (SF Tree Council) urged the preservation and protection of the existing trees in the park, and said they hope Lucas will not cut down the incredible grove of what she believes are Italian stone pines at the Letterman complex. 14-7

Alma Robinson (CA Lawyers for the Arts) congratulated the Trust for selecting an arts organization, which they had advocated, and hopes they will think about alternative housing for the employees, such as co-housing, live-work space and studio space. 14-8

Michael Levin finds it hard to accept a 900,000 profit-making enterprise within the boundaries of national parklands, although he knows self-sustainability is a mandate. He hopes the final EIS will incorporate everything necessary to preserve the Presidio. 14-9

Lucia Bogatay (Ft.Point-Presidio Historical Assn.) hopes the Trust thoroughly investigates the site for archeological remains before beginning construction. They believe the 23 acres should be reduced in density by locating some of Lucas's activities to another site, and concur with others that a master plan update would be helpful. 14-10

Courtney Damkroger (NTHP) said the preferred alternative does not appear to meet the general objectives of the GMPA. If the Trust is not going to embrace the GMPA, then it should produce a management plan that allows for meaningful, formal public involvement. They believe the Trust would be best served by sharing its financial plan with the interested public. 14-11

Joel Ventresca (Preserve the Presidio Campaign) said the EIS is inadequate, incomplete and misleading, and does not disclose the square footage for parking. Introducing a massive for-profit new commercial development complex which will have little to do with enhancing the park experience is unprecedented in American history, he said. 14-12

Donald Green said he and other groups have already urged the Trust to develop a comprehensive plan for the Presidio. He urges the Trust to start the comprehensive management program tonight so that in six weeks the public could comment on the EIS in a meaningful way. 14-13

Arthur Feinstein (GG Audubon Society) asked what impact 4,500 new employees in the park are going to have on the natural resources? The palm trees in the Letterman Complex are well-known as a resource for hooded orioles but, he asked, are the palm trees going to be 14-14

4

preserved? He would like both those questions answered in the final EIS. 14-14

Richard Casey has also found shortcomings in the DEIS. The purpose of the Presidio Park is to provide a recreational facility, he said. Yet such a topic as impact on recreational use is not included as one of the criteria for evaluating development proposals. 14-15

Bryan Foster questioned the value of digital art in general, although he did go to see Toy Store. Open space is not just open, he said, it is empty: a park. Call all the universities and suggest that they have satellite campuses there and pay to use the buildings. Use the place as a meeting center. It would pay for itself and be a great asset and a benefit to tourism, he believes. 14-16

Bill Hough (Resource Center for UN) said the United Nations Center in Building 104 was left off the Lucas model plan when it was unveiled. To him, that was symbolic: the financial considerations are the means to create the vision of a world-class center but the means, the financial, has become the end. He suggested the vision statement be made more easily available on the Trust's web site. 14-17

Steven Krefting (SF League of Conservation Voters) said they believe the Trust needs to take a step back from its headlong rush to finalize a developer, that the current process will not achieve the public trust necessary for success and that a new planning process is required which is more firmly focused on the vision developed through the GMPA process. 14-18

Jennifer Gridley (Cow Hollow Assn.) said that while they are pleased with the selection of the preferred alternative, they continue to be concerned about density and parking and traffic. There has been no discussion regarding a potential change from a single tenant to a multi-use tenant, likely to have more employees but with the same number of parking spaces. Further, the planning guidelines look only at the area within the Presidio walls, and they urge the Trust to take a more indepth look at the effects on the area surrounding the Letterman site. 14-19

Patricia Vaughey (Cow Hollow NIA) said that they have several concerns, such as traffic patterns, alternative solutions for left-hand turns, the noise of construction trucks and their entrance and egress, the pipes in Letterman hospital and the water flow, Doyle Drive and the problem of commissary and Burger King trucks exiting Gorgas onto the Lyon Street corridor instead of a commercial corridor. 14-20

COMMITTEE REPORTS

Marin Committee. Chair Merritt Robinson said the discussions on water and land transportation and the cell phone sites that were presented that night at the Commission meeting were the subjects covered in committee.

San Francisco Committee. Chair Jack Spring said the committee took a tour which began at the Great Highway and the Parcel 4 complex, where they were given a brief history of the parcel. Later they hiked up a new trail into Sutro Heights Park, then went on to East Fort Miley for a briefing and discussion of its potential.

There being nothing further to come before the Commission, Chairman Bartke said their next meeting would be held at 7:30 p.m., Tuesday; July 20, 1999, in the same place. The meeting was adjourned at 10:00 o'clock p.m.

There were approximately 85 members of the public present.

Responses to Comments in Letter 14

14-1

Please refer directly to letter 13 and corresponding responses for a detailed discussion.

14-2

For the response to the comment concerning the NEPA process, refer to master response 1B. For the response to the comment concerning the adequacy of the alternatives, refer to master response 6A and Section 2.1 of the Final EIS. Concerning the cumulative impacts analysis, refer to master response 4B. Please refer directly to letters 7 and 44 and corresponding responses for a detailed discussion.

14-3

For response to the comment concerning a comprehensive management plan and cumulative impacts analysis, refer to master responses 4A and 4B. For response to the comment concerning the apparent selection of a developer during the NEPA process, refer to master response 6B and Section 5.2 of the Final EIS.

14-4

Comment noted.

14-5

Comment noted.

14-6

Please refer directly to letter 48 and corresponding responses for a detailed discussion.

14-7

Please refer directly to letter 40 and corresponding responses for a detailed discussion.

14-8

Comment noted. Co-housing, live-work space, and studio space are all possible future uses for existing housing and non-residential buildings at the Presidio.

14-9

Comment noted. The Final EIS incorporates many of the suggestions made in the comments for protecting the Presidio and adds new analysis and information to the Draft EIS where required.

14-10

Please refer directly to letter 33 and corresponding responses for a detailed discussion.

14-11

The Trust believes the preferred alternative meets the General Objectives of the GMPA. For further response to the comment, refer to master responses 3A, 3B and 2A. For response to the comment concerning a comprehensive management plan, refer to master response 4A. For response to the comment concerning the public availability of the Trust's financial plan, the commentor is referred to the Trust's Financial Management Program in Appendix E of the Final EIS and master responses 5, 10A and 10B.

14-12

Please refer directly to letter 23 and corresponding responses for a detailed discussion.

14-13

For response to the comment concerning the need to develop a comprehensive plan for the Presidio, refer to master response 4A.

14-14

Please refer to master response 16. Also, please note that approximately 2,500 employees would work at the site under the preferred alternative, not 4,500 as reported in the minutes.

14-15

Please refer directly to letter 16 and corresponding responses for a detailed discussion.

14-16

Please refer directly to letter 54 and corresponding responses.

14-17

The building has been added to the model. The commentor's suggestion is noted.

14-18

The comment is noted for the record. On these issues generally, refer to master response 2A.

14-19

Please refer directly to letter 15 and corresponding responses for a detailed discussion.

14-20

Please refer directly to letter 32 and corresponding responses. The Presidio Trust has been, and will continue to be working closely with the organization and other neighborhood groups to resolve traffic issues in the Letterman Complex and adjacent areas.

Letter 15

COW HOLLOW ASSOCIATION

2867 Green Street
San Francisco
California 94123
(415) 567-8611

OFFICERS

Carol Livingston
President

Marco Quazzo
Vice President

Lori Brooke
Treasurer

Mary Irene Zemanek
Secretary

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JUN 22 1999
RECEIVED

June 15, 1999

NEPA Compliance Coordinator
Attn: Letterman Complex
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

Via Facsimile: 561-5315
Via e-mail: Presidio@presidiotrust.gov

The Cow Hollow Association represents residents in the area bounded by Lyon and Pierce Street on the West and East, and Greenwich and Pacific on the North and South. Our comments here are with regard to the Draft Environmental Impact Statement (DEIS) and Planning Guidelines for the new development and uses within the Letterman Complex.

While we are pleased with the selection of the Letterman Digital Arts proposal as the preferred alternative, we continue to be concerned about the overall density of the project. Nine hundred thousand square feet and 2,500 employees on a 23-acre site is four times the current density of Cow Hollow. 15-1

Traffic and parking have been issues throughout this process. Thankfully, the preferred alternative offers parking underground. However, there are 1,500 parking spaces for the proposed 2,500 employees. We have been assured that the employees will be given incentives to use alternative means of transportation such as ridesharing and vanpools. We still have several concerns however: 1) the proposed development will be under construction and perhaps complete before any improvements have been made to the affected intersections or to Doyle Drive, and 2) there has been no discussion regarding the potential change from a single tenant to multi-use tenants who would likely have many more than 2,500 employees with the same 1,500 parking spaces.

NEPA Compliance Coordinator
Page Two
June 15, 1999

The Planning Guidelines presented in the DEIS document discuss building form, architectural compatibility, and edge conditions. The guidelines suggest that the development should be compatible in scale with the residential character of the buildings along Lyon Street, and that the development should respect the historic green space at the edge along O'Reilly Street. The Letterman Digital Arts proposal does not conform to these guidelines. The massive five-story building at the O'Reilly edge dwarf the row of residential buildings across the street, and the building at the corner of Lombard and Lyon is certainly not compatible with the residential character of the buildings along Lyon Street. 15-2

Finally, The Cow Hollow Association urges the Presidio Trust to take a much more in depth look at the long term effects on the greater area surrounding the Letterman Site, not just inside the Presidio wall. Equally important is the need for a comprehensive plan which considers all of the proposed development within the Presidio including the Public Health Service Hospital, Fort Scott, and additional housing that may be constructed. 15-3

We appreciate the opportunity to be an integral part of this planning process, and looks forward to working with both the Presidio Trust and Lucas Films to refine the preferred alternative to one that is compatible with our neighborhood.

Sincerely,

Jennifer Gudley for.

Carol Livingston
President

cc. Cow Hollow Board of Directors
Golden Gate National Recreation Area Advisory Commission

Responses to Comments in Letter 15

15-1

It is unlikely that improvements to Richardson Avenue would be completed prior to the start of construction of the project. Consequently, the construction traffic routing shown on Figure 19 of the Final EIS and discussed in Section 4.1.7.6 assumes no improvements to existing roads and highways. A construction traffic management plan as discussed in mitigation measure TR-5, *Construction Traffic Management Plan*, would be developed to further specify routes, times of operation, and other factors to mitigate construction impacts on neighbors both inside and outside the park.

In response to the comment concerning future use by a multi-use tenant with more than 2,500 employees, the parking demand calculation for the preferred alternative incorporates the potential that the 900,000 square feet could be occupied by standard office-use tenants. The 1,530 spaces proposed by the preferred alternative's development team would be adequate to accommodate the demand. In addition, see master response 20 for a discussion of parking demand and capacity.

15-2

For each alternative, inconsistencies with the Planning Guidelines are described and an assessment of their effects on the historic district are analyzed and documented within the Environmental Consequences section of the Final EIS. Text has been added to this section to further clarify these consequences. See master responses 7A and 7B discussing consistency with the Planning Guidelines and future public involvement.

15-3

For a response to the comment concerning long-term effects on the surrounding neighborhoods, please refer to master response 17. For a response to the comment concerning the need for a comprehensive plan, refer to master response 4A.

Letter 16

-----Original Message-----
From: rgcasey@ix.netcom.com [mailto:rgcasey@ix.netcom.com]
Sent: Tuesday, June 22, 1999 11:30 AM
To: planning@presidiotrust.gov
Subject: DEIS comments

Comments on the Draft Environmental Statement
Offered June 15, 1999 before the Presidio Trust Advisory Commission

Richard Casey
1785 Webster Street
San Francisco, CA 94115
Representing myself as one who enjoys walking and cycling in the Presidio, and is concerned about its future.

I would like to point out what I think is a serious oversight in the DEIS, or at least in the summary available over the
Internet. The purpose of the Presido Park, as one speaker in the last meeting pointed out by reading from the Congressional
Record, is to provide a recreational facility. Yet the DEIS does not include "impact on recreational use" as one of the
criteria for evaluating technical proposals.

I can imagine many ways in which proposed developments could interfere with hiking, cycling or simply touristic enjoyment of
the Presidio. I think that this aspect of development should be specifically addressed in the evaluation process, along with
such criteria as water quality, solid waste disposal, employment, wildlife, noise and air quality, which are already discussed
in the DEIS. Even if recreational impact is included somewhere in the complete report, it should appear in the summary, the
document that most people will read. 16-1

Response to Comment in Letter 16

16-1

Thank you for your letter. The impacts on recreational opportunities are discussed in Appendix A (Section W. Recreation) and Sections 4.1.7.4 through 4.6.7.4 (Impacts on Pedestrian and Bicycle Facilities) of the EIS. In addition, Sections 4.1.8.5, 4.2.8.7 through 4.5.8.7, and 4.6.8.5 (Effects on Visitor Experience) have been added to the text. The text in the Summary has been revised to reflect the major conclusions in the discussions. In addition, please refer to master response 25.

Letter 17

MARILYN D. MINTZ
PRESIDENT
THE SWEETHEART ARTS COMPANY, INC.

P.O. Box 1411
Los Gatos, CA 95031 U.S.A.

Telephone: (408) 356-1966

PRODUCTS ®

©1990 MARILYN D. MINTZ
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June 30, 1999

JUL 2 1999
RECEIVED

Mr. John Pelka
NATIONAL ENVIRONMENTAL POLICY ACT COORDINATOR
PRESIDIO TRUST
P.O. Box 29052
San Francisco, CA 94129-0052

Re: Mr. George Lucas' request for a campus at the San Francisco Presidio; Marilyn D. Mintz, President of THE SWEETHEART ARTS COMPANY, INC. believes that Mr. George Lucas is flagrantly infringing on her intellectual property

Dear Mr. Pelka:

Should Mr. George Lucas be rewarded with permits to build on the San Francisco Presidio, if he is allegedly egregiously infringing on United States' intellectual property rights protected property?

It is my understanding that Mr. George Lucas is flagrantly violating United States' intellectual property laws by allegedly egregiously infringing on my intellectual property rights protected property.

June 15, 1999, prior to the public hearing, I telephoned the Presidio Trust to tell of my strong objections to the George Lucas Presidio Campus, because I understand that Mr. Lucas is flagrantly infringing on my intellectual property. (I spoke with Ms. Anita Roberts, Leasing Assistant.)

During 1997, I mailed to Mr. George Lucas letters by certified mail, with return receipt, that were returned to me, not accepted; so I had to FAX my letters to him regarding, "it is my understanding ...", that he is infringing on my intellectual property.

I believe that much of the merchandising for STAR WARS trilogy and PHANTOM MENACE film, including many of the main characters, are infringing on my intellectual property rights protected property. 17-1

My background includes my M.A. in Film and Television from the University of California at Los Angeles. I expanded my 1975 Master's Degree thesis into THE MARTIAL ARTS FILMS book, (1978), the first book to describe and define the genre, that received excellent reviews.

Enclosed are copies of five of my advertisements, that show some of my intellectual property rights protected property.

My intellectual property that I believe Mr. George Lucas is infringing on includes from about 1965 through 1976, for the 1977 release of STAR WARS film, and continued through the STAR WARS trilogy. I allege additional infringements are in the 1999 PHANTOM MENACE film, including infringing on my 1997 registered copyrights.

Should Mr. George Lucas be rewarded with permits to build on the San Francisco Presidio, if he is allegedly egregiously infringing on United States' intellectual property rights protected property?

Page 1 of 2

Mr. John Pelka
NATIONAL ENVIRONMENTAL POLICY ACT COORDINATOR
PRESIDIO TRUST
P.O. Box 29052
San Francisco, CA 94129-0052

Marilyn D. Mintz
THE SWEETHEART ARTS COMPANY, INC.
P.O. Box 1411
Los Gatos, CA 95031

June 30, 1999

(Continued)

Sincerely,

Marilyn D. Mintz

Marilyn D. Mintz

cc: Mr. Jim Meadows, Executive Director of the PRESIDIO TRUST
Ms. Anita Roberts, Leasing Assistant
Ms. Susan Ju, Real Estate Assistant

Enclosed:

1. Two pages of copies of some excerpts of some reviews of my 1978 book, THE MARTIAL ARTS FILMS, (expansion of my 1975 U.C.L.A. Master's thesis)

   THE MARTIAL ARTS FILMS is the first book to define and describe the genre.

2. Five pages of copies of my advertisements, that were printed in magazines that were also distributed at the New York International Toy Fair, or in an international licensing guide

3. Marilyn D. Mintz's business card; Marilyn D. Mintz is Inventor and Creator of the SWEETHEART ARTS®® Doll, and Founder and President of THE SWEETHEART ARTS COMPANY, INC.

MAILED BY U.S. Express Mail, July 1, 1999

FAX Date: July 1, 1999

Response to Comment in Letter 17

17-1

Thank you for your letter. This issue is not related to the NEPA analysis. The NEPA regulations provide that comments on an EIS need only address the adequacy of the statement, or the merits of the alternatives discussed, or both.

Letter 18

The National Parks and Conservation Association posted an electronic form letter on its webpage that was sent by 100 individuals. The list of individuals whom submitted the letter appears immediately following the master responses (page 55). A copy of the letter that was posted is reprinted here. All sent letters are available for review at the Presidio Trust.

I am writing to voice my concern about the potential mismanagement of the Presidio's unrivaled cultural, natural, and historic resources and to urge you to select an alternative for the Presidio that genuinely complies with the plan developed through an open public process by the National Park Service. 18-1

It has recently been brought to my attention that the Presidio Trust, the group responsible for ensuring the restoration of the Presidio's 500 historic buildings while preserving the integrity of the area according to national park standards, has already begun exclusive negotiations with Lucas film's Letterman Digital Arts Ltd. In addition to raising serious process concerns by starting negotiations before the August 2, 1999 public comment deadline, the Presidio Trust is placing the Presidio at risk by choosing the option that: 18-2

* devotes the highest proportion of space to private industry;
* is lease compatible with the Park Service's original plan; 18-3
* brings in the greatest number of commuting employees; 18-4
* provides the fewest public amenities; 18-5
* his the lest devotion to any educational purpose; 18-6
* is the least compatible with the Trust's own published guidelines; and 18-7
* amounts to the industrialization of the Presidio. 18-8

If the Presidio Trust cannot find an alternative that complies with park objectives and the Trust's goals and guidelines, then they need to amend their management plan. The Trust claims that its decisions are based on financial necessity, however the Trust's annual budget expectations remain undisclosed to the public. The Trust needs to make its financial plans public to give the public an opportunity to propose other means for the Trust to meet its obligations. 18-9

I strongly urge the Trust to rethink their plan and avoid sacrificing irreplaceable national park resources in the name of financial expediency. 18-10

Sincerely,

Responses to Comments in Letter 18

18-1

Thank you for your letters. The Presidio Trust manages the properties under its administrative jurisdiction in accordance with the purposes set forth in Section 1 of the Golden Gate National Recreation Area Act and the General Objectives of the GMPA. As such, the Presidio Trust shares the commentor's concern for the long-term preservation of the cultural and other resources of the Presidio. Following meaningful public involvement, the Presidio Trust selected the alternative that it believes would best fulfill its statutory mission and responsibilities, given consideration to economic, environmental, technical, and other factors. These factors included compliance of the alternative with the GMPA which is discussed in Sections 4.1.1.2 through 4.6.1.2 of the EIS. See master responses 2A and 3B.

18-2

For response to the comment concerning the start of negotiations during the NEPA process, refer to master response 6B.

18-3

This statement is not supported by the facts. As discussed in Section 4.5.1.2, among all alternatives, a Digital Arts Center may come closest to adhering to the NPS's original plan for the Letterman Complex. Refer to master response 2A.

18-4

Table D-3 in the Draft EIS indicates that the preferred alternative would generate the least peak-hour traffic, with the exception of the no action alternative.

18-5

The commentors' opinion is noted for the record. As discussed in Section 2.5, public amenities provided by the preferred alternative include a 7-acre "Great Lawn," a significant site feature for park visitors which devotes the largest amount of public open space compared to the other alternatives. Also, refer to master response 25.

18-6

The commentors' opinion is noted for the record but is not shared with the San Francisco Unified School District (letter 43), the American Association for the Advancement of Science (letter 63), or the California Department of Education (letter 64). The preferred alternative includes an education foundation, an archive related to the digital arts, and an institute offering a digital arts training program. Both the archives and educational institute would provide public programs, including outreach to a diverse community, introducing schools and students to emerging multi-media/digital technologies.

18-7

Please refer to master response 7A.

18-8

Please refer to master response 2A and Section 1.1 of the Final EIS.

18-9

The Trust does not believe there is a need to amend the GMPA. For a more complete response to the comment, refer to master responses 2A and 2B. For response to the comment concerning disclosure of the Trust's financial plan, refer to master response 5 and Section 1.2 of the Final EIS.

18-10

The concerns of the commentors are noted for the record. For response to the comment concerning sacrificing the park for financial expediency, refer to master response 2A.

Letter 19

My dear freinds,

I write to you and humbly ask that you copy and paste the below letter, removing my name and replace it with yours- you do not need your adress- but
it would be nice. The purpose of this letter is to help save the historic
resources of the Golden Gate National Recreation Area. It is in danger of
being developed.
I also ask that you copy and paste the letter and send it to those you know
who would also want to help. Have them follow the same directions. In order
to look somewhat decent- cut and paste please. This is a real letter- I wrote it myself. This is not some fake chain letter. But if you do send it-
that is nice- if you don't send it- then it is your thing.
thanks in advance!
Greg
Here is the adress where you can send the e-mail:
Presidio@presidiotrust.gov
Remember! Get your pals to help, too!
Here is the letter that I wrote:

To whom it may concern:

19-1

I am writing to you in regards to the current situation at Golden Gate National Recreation Area, specifically the Presidio of San Francisco. By writing this letter I wish to voice my sincere fears about
this feature of the park and it's preservation.

The notion that the Army's obsolete buildings located at the
site should be razed to make room for privatization is frightening In doing
so several factors come into play ranging from preservation to issues of
land use and support of these new facilities.

At first privatization may seem an easy way to ease concerns
over money,
but long range planing reveals that it is not the case. An excellent example
is the Manasas battlefield. With the county being blinded by the easy money
offered by development, they failed to see the hidden costs that far outweighed the benefits. These costs included the rerouting of roads, providing parking, creating adequate systems to care for sanitation needs
and so on. More importantly the county officials failed to see the irreparable harm that would befall the historic battlefield.

The decision that those in charge of the Presidio Trust have made to negotiate exclusively with Lucasfilm's Letterman Digital Arts Ltd. is a dangerous one. In doing so any claim that the Trust is committed to the plan developed by the National Park Service in 1994 is unfounded. Private development on NPS lands or those that are involved in any form of long range planing represent a dangerous precedent. The Letterman Hospital site would be better used in housing a not for profit site dedicated to learning or being made into a park.

Several problems would be avoided by not utilizing this land for private development. Committing a large percentage of space to a private firm is least compatible with the Park Services plan. It brings in a large number of commuting employees that provides the Park with an unnecessary hardship. It devotes excessive space to parking which could better serve the public as a park or museum. The site will likely not provided enough public amenities. And finally this plan amounts to the industrialization of the Presidio. It is for these reasons that National Parks, such as the Presido, can not support private sites. 19-1

Though Lucasfilms contends that they provide educational resources, the Letterman project is not one of those educational services. A national historic area is not the site for private business. In addition this industrialization does not mesh with the guidelines set up by the National Park or the Presidio Trust.

Could the land not be better used for government purposes? Could the land not be better used for public education? Could the land not be used for museums seeking additional space such as San Francisco's DeYoung or Academy of Sciences? Parks serve the people of our nation in this way- not businesses.

I wish that those in charge of the Presidio Trust select an alternative plan that allows the Park Service's original plan reach fruition. And I ask that the Trust also makes it's financial plans public and give the people of the nation an opportunity to voice their opinions in regards to the future of this site.

Thank you,
Gregory D. Specter
5286 Sell Road
New Tripoli, PA 18066

Response to Comment in Letter 19

19-1

The commentors' concerns are noted. For response to comments concerning the precedential effect of privatization, refer to master response 8. For response to comments concerning consistency of the proposed action with the GMPA, refer to master response 2A. The commentor's concerns about the scope of alternatives that have been considered are addressed in master response 6A. The Trust disagrees that the scope of alternatives considered have been insufficient. Additional evaluation of alternatives was conducted in conjunction with the preparation of the GMPA, and the commentor is referred to the EIS for the GMPA, from which this EIS is tiered, for analyses of further alternatives. See also Section 2.1 of the Final EIS. With respect to concerns about exclusive negotiations with Letterman Digital Arts, Ltd., the commentor is referred master response 6B. On the issue of making the Trust's financial plan publicly available, refer to master responses 5, 10A and 10B.

Letter 20

1

GOLDEN GATE NATIONAL RECREATION AREA
AND POINT REYES NATIONAL SEASHORE

ADVISORY COMMISSION

MINUTES OF THE ADVISORY COMMISSION MEETING
JULY 20, 1999

[A verbatim transcript of this meeting is available for public review in the Office of Public Affairs and Special Events, GGNRA, Building 201, Fort Mason, San Francisco, CA 94123. The following is a brief summary.]

Meeting time: 7:30 to 10.05 p.m.
Location: Building 201, Fort Mason, San Francisco, CA

Present for the Advisory Commission:
Chair Rich Bartke, Vice Chair Amy Meyer, Michael Alexander, Howard Cogswell, Naomi Gray, Redmond Kernan, Mel Lane, Yvonne Lee, Trent Orr, Lennie Roberts, Merritt Robinson, Hank Sciaroni, Jack Spring, Ed Wayburn and Jacqueline Young.
Staff Liaison: Michael Feinstein.

Present for the Golden Gate National Recreation Area:
General Superintendent Brian O'Neill, Planning and Resource Management Specialist Nick Weeks, Plant Ecologist Sharon Farrell and Real Estate Specialist Richard Lauthan.

Present for the Presidio Trust:
Executive Director Jim Meadows and Planning Manager Carey Feierabend.

Summary of Matters Discussed:

APPROVAL OF MINUTES

The minutes of the Advisory Commission meeting of June 15, 1999, were accepted as mailed.

PRESIDIO VEGETATION MANAGEMENT PLAN

Nick Weeks briefed the Commission on the previous public involvement in the plan which has culminated in a joint (with the Trust) Draft Vegetation Management Plan and EA (produced by GGNPA) with public comment scheduled for the August and September Commission meetings. Then, with the benefit of slides, he described the three vegetation components: the historic landscaped vegetation, the native plant communities and the historic forest, and how it is proposed that they be managed.

Carey Feierabend, Planning Manager with the Trust, continued the slide presentation, explaining the proposed implemtation strategy and its three phases, the extensive partnership program and the strategies for funding the project.

Sharon Farrell, Plant Ecologist with NPS, described the pilot projects that would be developed during the the first five years of the plan (the pre-implementation phase), to gain as much information as possible about soil types, species diversity, the forest understory, etc., through interagency collaboration and by building from an existing knowledge base.

2

Public Comment:

Bill Shepard (Lake St. Residents Assn.) thinks it is a wonderful document but has concerns in terms of the balance between trees and plants, and asked that the cut-off date be extended to October 15 because a lot of people are away or not available in the summer.

Josiah Clark grew up on Lake Street and would not be supporting the proposed plan if he didn't think it would retain the areas precious to him as a kid running around in the forest.

PRESIDIO LETTERMAN DRAFT EIS

Jim Meadows, Trust Executive Director, reiterated that the EIS process is in parallel with, but is not directly tied to, the selection process in the Letterman Complex. He asked Carey Feierabend to discuss the details of the EIS.

Carey highlighted the milestones in the process: in April, the draft SEIS was released, followed by presentations to the Advisory Commission and by the Trust to the public; at the May Advisory Commission meeting public comment was taken; in June formal announcement of the preferred alternative, a 45-day extension of the review period and public comment; July (the present meeting), further public comment, August 2 being the closing date for comment; in October the final EIS will be released which will respond to all oral and written comments; and in November, a Record of Decision is anticipated.

Public Comment:

Mark DeVine is concerned that the Letterman is scheduled for destruction (he was born there) and thinks it would be damaging to the natural, social and cultural environment. 20-1

Gail Sredanovic believes that the site could be used in ways more obviously of public benefit such as education, museums, government buildings, that could conceivably bring in revenue, and that all financial plans be made public. 20-2

Patricia Vaughey (Cow Hollow NIA) thanked the Trust for working with them but she is disturbed by no mention of tour buses in the EIS and no discussion of events in the neighborhoods that interfere and influence traffic flow. 20-3

Bryan Foster thinks the property should be turned into an environmental study center and the buildings leased out to universities with Letterman as the main administration building and computer center. 20-4

Steve Bodzin hoped to see an analysis in the final EIS of the effect on Bay Area housing stock of bringing in high-paying jobs, since affordable housing on the Presidio is so far inadequate. 20-5

SUPERINTENDENT'S REPORT

Brian O'Neill referred to his printed report and said he was just going to mention items that weren't included in that. First, he said, the park is close to completing a deal for the purchase of the Arana property at Lobos Creek, and is exploring the possibility of a donation of the Billman property, also along Lobos Creek, which could then be incorporated within the park under existing GGNRA legislation.

The other issue that he said was causing concern is the future of the Camera Obscura. Under the plan that was adopted, the Camera Obscura was incorporated as a component of the Cliff House rehabilitation. Since there is a new concession agreement in place, the implementation of that plan is now the responsibility of the concessionaire. Also, its potential for addition to the National Historic Register is being evaluated. So either way, the Camera Obscura is going to be preserved. However, in order to begin the rehabilitation of the Cliff House, the new visitors facility at Merrie Way should be ready to receive the functions that are to be moved out of the Cliff House and, as money is short these days, it is taking time to identify the funds necessary to put together a funding package. So the issue of the Camera Obscura will wait an analysis of its historic elements, and then how best to handle it in the rehabilitation of the Cliff House.

3

Public Comment:

Rebecca Haycox (Friends of the Camera Obscura Com.) said there is concern that the Camera Obscura is subject to removal after its lease expires on December 31, 1999. She asked that the lease be extended until its acceptance into the National Register, and requested that the matter be placed on the agenda for the next Commission meeting.

Peggy Vincent presented the Commission with a book of Playland at the Beach photos and memorabilia, saying that the Camera Obscura is the last remnant of Playland's attractions. She said she drove down from Santa Rosa to ask the Commission to please save the Camera Obscura in its current location as a piece of San Francisco history.

David Warren said he seems to come to a Commission meeting every ten years to try to save the Camera Obscura, which is more than just a little box that sits there at the ocean's edge. He said it is the only building that exists about Playland and represents a very important form of architecture, and believes it would be nice if people could continue to visit it.

Thomas Roop said he has lived in this area all his life (50 years) and coming to the GGNRA is new to him. But the Camera Obscura and Playland at the Beach is not new. He thanked Mr. O'Neill for applying to the National Register of Historic Places and asked the Commissioners to help save the Camera Obscura.

Chairman Bartke assured the speakers that there were no plans to eliminate the Camera, and suggested putting it on the agenda several months from now when there actually may be something to discuss. Superintendent O'Neill agreed and said they want the Camera Obscura to continue to operate as it is until the public process for the redesign of the Cliff House actually occurs. Chairman Bartke said they would all be notified when the meeting date is established.

GGNRA PARKWIDE WIRELESS TELECOMMUNICATIONS FACILITY GUIDELINES

Richard Lauthan, a real estate specialist with GGNRA, presented the revised guidelines for cell sites to the Commission, incorporating input received at the last Commission meeting, and said he was here to respond to any questions anyone had.

Commissioner Meyer said she could not advise the Park Service based on the document, having no clear feeling of what she was being asked to vote on. Commissioner Wayburn was critical of the failure to mention in the document the cumulative impacts of all the companies which would have a great deal to do with site guidance and the issuance of permits. Chairman Bartke suggested they hear from the public, then from other Commissioners.

Public Comment:

Libby Kelly said she was with a group of citizens who are challenging the FCC in court based on the implementation of the Telecon Act, and she presented the Commission with a packet of information about that case. She said the technology is changing rapidly and there already are alternatives to monopoles. Also, there is a body of research showing there are biological effects which may be cumulative. She talked about the migratory birds on the Pacific Flyway and the millions that are dying annually, and mentioned a proposal to site a large facility on Point Reyes Hills.

David Grace said the microwave towers are very dangerous, and to allow the construction of any of those towers puts both NPS and the Trust at financial risk. He asked if we taxpayers are going to be burdened with a welfare program for the cell companies who will want us to take on financial responsibility and liability for the placement on our property? You may look at it as a revenue source, he said, but they will be looking for financial waivers.

Chairman Bartke thanked the speakers and asked for questions or comments from other Commissioners. Dr. Cogswell asked about the range of height of the towers and if there were going to be guywires, because most of the birds who hit tall structures are night-flying migrants. Trent Orr said he shared Dr. Wayburn's concerns about cumulative impacts and Amy Meyer's concerns about not understanding what it is that is expected of the Commission. Commissioner

4

Alexander wanted to know more about the new technology that would significantly lessen the impact of the sites. Jim Meadows said they had been told that multiple sites could be located with one transformer, and not even of the size that exists today. Amy Meyer said that what she would need if she were asked to judge a future site would be something as simple as a check list that would include the issues that have been brought up from the audience and from within the Commission. Commissioner Kernan believes the guidelines should be kept in draft form, capable of revision as we learn more, and approach each permit on a case-by-case basis.

Chairman Bartke summed up the Commissioners' ideas on how to rework the guidelines, as follows: 1) The guidelines should talk about the cumulative effect. That is, companies should co-use existing installations or they can't be at that site. 2) The guidelines should speak to maximum height and guywires. 3) The staff will cooperate with the Trust and Point Reyes staff in adopting uniform guidelines. 4) Time limits, permit terms, and grounds for renewal of a permit will be clarified. 5) Companies will switch to new technology when requested and remove the old technology. 6) The guidelines will be in the form of a checklist, so as to be more easily understood.

Superintendent O'Neill promised to get together with the Trust and Point Reyes staff and report at the next meeting.

PRESIDIO TRUST DIRECTOR'S REPORT

Jim Meadows, Executive Director of the Trust, said the RFQ for the Public Health Service hospital had been responded to by 16 different groups of which eight were for the entire complex. The archeological research at the Presidio, a joint effort with the Park Service, is underway, and he invited the Commissioners to come out and take a look. He said the Presidio gate restoration is in progress and the gate has been moved three feet to improve access. The RAB had its first post-Army meeting with the Trust as lead agency. A partnership has been formed with the Alliance to bring a reduction in energy costs to the Presidio. The fire station has been completed and the Fire Department is back in its headquarters and operating as usual. He referred the Commissioners to his printed report.

DIVERSITY COMMITTEE REPORT

Committee Chair Naomi Gray said issues presented at the meeting were a discussion of the Presidio tenants and diversity, a discussion of the workforce profile and diversity issues at GGNRA and Point Reyes, and future goals of the committee.

Chairman Bartke said there was a pending question that needed answering about extending the public comment period on the Vegetation Management Plan. Director Meadows said yes, it would be extended to October 19, 1999.

There being nothing further to come before the Commission, the Chairman adjourned the meeting at 10:05 o'clock p.m.

There were approximately 55 members of the public present.

Responses to Comments in Letter 20

20-1

The speaker is referred to Section 4, Environmental Consequences and Appendix A, Revised Environmental Screening Form of the EIS for an evaluation of the impacts of demolishing the LAMC on the natural, social and cultural environment.

20-2

Comment noted. Please refer to the master responses 5, 6A, 10A, 10B, and Section 1.2 of the Final EIS.

20-3

See the response to comment 5-3.

20-4

Please refer directly to letter 54 and corresponding responses for a detailed discussion.

20-5

The shortage of housing in the city for low- and moderate-income groups is noted, and the text of the Final EIS has been revised to note the adverse cumulative impact on affordable housing in the city. To limit the demand for affordable units in San Francisco, the Presidio Trust offers reduced rental rates to Presidio employee and tenant households with gross household incomes of less than $45,000. Please refer to the response to comment 36-23.

Letter 21

356 Marietta Drive
San Francisco. CA 94127
July 25, 1999

JUL 27 1999
RECEIVED

NEPA- Compliance Coordinator
Attn: Letterman Complex
Presidio Trust
34 Graham Street
P. O. Box 29052
San Francisco, CA 94129-0052

Dear Sir/Madam:

Presently, there are two precedent-setting projects being undertaken in the San Francisco Bay Area that will have, albeit for different reasons, far-reaching, long–lasting, and irreversible environmental effects. The first of these is the proposed massive runway fill project at San Francisco International Airport and the second, of course, is the privatization of the San Francisco Presidio.

This Letterman Complex Draft Environmental Impact Statement (LCDEIS) raises a number of issues and questions with regard to the final proposals for the development of the 23-acre Letterman Hospital site and compliance with the guidelines set forth in the 1994 Presidio General Management Plan Amendment (GMPA), the Presidio Trust Act (PTA), and this very DEIS (LCDEIS).

Controversy is already developing regarding a pay-as-you-go policy for public land, which traditionally has been provided as a government service underwritten by U.S. taxpayers. In particular, is it really necessary to develop the Letterman Complex as a private "anchor" activity in order, to preserve the very existence of the gem-like Presidio? Although, the PTA established the Trust Board to oversee and manage private participation as a source of revenue for the operation, maintenance, and enhancement of the Presidio, the question still remains as to why experiment with the Presidio. 21-1

Included in the 1994 GMPA was Appendix F: Cost Estimate Summary, a one-page compilation in 1993 dollars, of estimated planning and construction costs for various Presidio areas. The Summary did split out National Park Service (NPS) costs from tenant costs but was remarkably vague as to the scope of the construction enhancements and any assumptions such as project life, life cycle costs, interest rates, schedules, etc.

NEPA- Compliance Coordinator -2- July 25, 1999

As such, it was almost impossible to determine how much any yearly-amortized amount of the $666 million total would exceed the Secretary of Interior's $25 million budget allocation for the Presidio.

It was the Trust Board with its Financial Management Plan (FMP) report to Congress in July, 1998, that forecast annual decreases of $625,000 in the $25 million annual budget allocation up through 2010 followed by accelerating decreases of $3.125, $3.000, and $12.000 million in the final three years to meet the 2013 self-sufficiency deadline (Appendix B).

Apparently, then, the Trust Board trying to fast track this self-sufficiency commitment, planned to sell $25 million in interest-only Treasury bonds (as authorized by the PTA (Sec. 104 [d][4]), in 1999 and 2000, in order to obtain up-front money for the Presidio revenue generating improvements.

The problem is, of course, that most of the revenue-producing Presidio projects must be in place well before 2010 in order to guarantee the program's success. The sharply decreasing Interior budget allocations, combined with debt service that jumps from $3 million (6% of $50 million) to $5.1 million in 2013, creates a type of "balloon" payment scheme. This is a formula for certain failure if tight development schedules are not met or if the privatization of the "keystone" Letterman Complex falters. 21-1

The GMPA's $666 million in 1993 dollars closely approximates (assuming an inflation rate of 2.25%/year) the $752 million (2013) in 1998 dollars used in the FMP. The $53.6 million revenues projected for 2004 (the anticipated Letterman Complex completion) correlate well with the revenue forecast from the Presidio activity areas listed in the FMP narrative; i.e., Letterman Complex, General Offices, Fort Scott, Public Health; Golf Course, and Utilities. Projected costs, however, do not correlate as closely.

One problem, however, is that the FMP anticipated revenue of $44 million from the Letterman Complex is based on $40/sf times 1.1 million sf, not the 900,000 sf of new replacement office space proposed. Assuming this rate is still valid, this $8 million difference is significant because the Letterman Complex will generate approximately 82% of the projected revenue in 2004. The "keystone" Letterman Complex development, then, presents an "all our eggs in one basket" approach and will give any leasee negotiator (probably Lucas as front runner) considerable leverage.

NEPA- Compliance Coordinator *-3-* *July 25, 1999*

Under the PTA (Sec. 104 [o]), if the Presidio Board fails to accomplish its "goals and objectives" of self-sufficiency set forth in the FMP, all the Presidio designated as Area B (but not including the beach areas) will risk exclusion from the Golden Gate National Recreation Area (GGNRA), reversion back to the General Services Administration (GSA) and possible disposition under the Defense Authorization Act of 1990. This is not a very happy prospect for either environmentalists or the tax-paying public. 21-1

Because the Letterman Complex project disproportionately effects the preservation and protection of the historic, cultural, and natural attributes of the entire Presidio, and because the generation of private revenue sources are so critical under the PTA scheme, the inclusion of a thorough financial analysis in this DEIS is absolutely essential.

A somewhat related question to the above financial issue is, what are the true motives and sympathies of the seven-member Trust Board in its role as "lead agency" in this DEIS? Although the PTA specifically mandates (Sec. 103[c]), a Board with "knowledge and experience in … city planning, real estate development, and resource conservation," there is precious little emphasis on preservation or protection. 21-2

I have already pointed out a potential financial "trap." There are other "traps" as well. The term "sustainability" is repeated throughout all the Presidio plans and statements but in light of recent newspaper coverage regarding certain Trust Board members and Mendicino County redwood timber holdings, the term "sustainability" apparently means different things to different people.

Similarly, the meaning of the term "trust" seems rather arbitrary. Trust, to me, implies a fiduciary relationship, which in this case, runs backwards from the Presidio Board through the GGNRA; Department of Interior, Executive, and to the tax-paying public. Anything less, to me, is conflict of interest. 21-3

Where then, does compliance with the guidelines set forth in the 1994 GMPA for the Letterman Complex begin to breakdown? After all, the PTA, FMP, and this DEIS, all echo the GMPA's call for the "preservation and enhancement of cultural, natural, recreation, and scenic resources."

Again and again, there is the mention of the "enhancement of social programs, environmental programs, shared spaces, public outreach, and public input into educational, artistic, scientific research, environmental, healthcare,

philanthropic, conflict resolution, and international relations functions. How, then can these be anything but a mandate!

But this mandate goes much farther then just considering the preservation of the medical-related function of the original Letterman Hospital and Research Center with its expectation of the University of California San Francisco leasing the complex for bio-research. This goes to public benefit and to public access. 21-3

The Trust Board, obviously, recognized these conflicts with the 1994 GMPA because the Board, in order to facilitate the Letterman Complex development incorporated changes to the original GMPA into this DEIS. In doing so, it ignored the mandate. Changes to the 1994 GMPA for the Letterman Complex should have been handled separately as a discrete amendment open to public discussion.

On the subject of public hearings, the Board is well within its prerogative to have the GGNRA, as "cooperating agency," hold its public environmental meetings. In doing so, though, the Board, which is obligated to hold two public meetings per year, may have isolated itself, and failed in the EIS requirement for adequate public notice and opportunity for the public to be heard. All of these issues serve to further undermine the credibility of the Trust Board. 21-4

Now let's proceed to the specific environmental analysis of this Letterman Complex DEIS. The demolition and replacement of the Letterman Medical and Research facilities totals approximately 807,000 sf (rounded up to 900,000 sf) with about 522,000 sf (48 buildings) remaining intact within the 60-acre site. The Lucas Digital Art Center proposal, presently the front runner, would replace the 900,000 sf structure and also incorporate a 1260-car, two-level underground garage into its concept. Assuming that the garage would add at least 500,000 sf (550,000 sf according to the newspapers), this, together with the 522,000 sf of preserved buildings will exceed the 1.3 million sf Letterman Complex DEIS cap. 21-5

Generally, the final proposals comply with the guidelines for the preservation of historical buildings, scenic vistas, ground slope, architectural compatibility, natural drainage patterns, and height limits. There is, however, a certain sameness and predictability about all the proposals. 21-6

The proposed Lucas Digital Arts Center, does seem, though, to break ranks, albeit, too vague and too entertainment oriented, with its hi-tech concept. At the very least, the intriging concept of a Digital Arts Center should be "fleshed out" in detail to cover the aforementioned "enhancements" and guidelines

requiring "public interpretative services, visitor orientation, and educational programs." The Lucas organization certainly has the creative and technical talent, as well as the financial where-with-all to do this and much, much more. A clarification should also be included in any final EIS.

Remember that the provisions of the PTA already provide substantial tax and assessment-free status at the federal, state and local levels (Sec. 103 [c][9]), as well as significant (75%) loan guarantees (Sec. 104[d][1][c]), all at the U. S. taxpayers' expense. Therefore, both public access and beneficial use, as far as practicable, must remain part of the package.

The Trust Board must not become too enamoured with catchwords such as "animation, digital, and hi-tech." Twenty-five years ago a programmable hand calculator was considered a miracle. People then marveled at film animators like Disney and Harryhausen, both of whose accomplishments have been eclipsed by ILM and Pixar. Can complete life-like animation of "star" actors be that far off? Already we have seen an animated Japanese teen idol, Kyoko Date, and an ethnically controversial Star Wars character--Jar Jar Binks. The bottomline is that in twenty years, these present novelties will be common place technologies. The "light" and "magic" may very well vanish from ILM, leaving only the "industrial." Hopefully, the Trust Board will want something more substantial and permanent for the Presidio. 21-6

The Letterman Complex proposals plan heavy employee use of Gorgas Avenue to access underground parking facilities. The present PM peak-load off-ramp loading from Richardson Street to Gorgas Avenue is only 26 vehicles (LC DEIS) (Fig. 12e) per hour. With 2,500 anticipated employees, approximately 25% at which will come from either Marin County or the Peninsula (Table 12) and with Gorgas Avenue PM peak hour (presumably also AM), vehicle loads forecast at 750/hr. (Table 15), the Richardson Street off-ramp usage should increase at least five–fold. Add to this, external peak-hour trips (Table D3) forecast at 570/hr. (Table 14), and the congestion to and from Richardson Street, along Gorgas Avenue, is obvious. 21-7

Although in the past, Caltrans and the Golden Gate Bridge District have largely ignored the widening of Doyle Drive and realignment of the Richardson Street on/off access ramps, any backup at the Gorgas Avenue exit will almost certainly get a response. Potential Caltrans planning conflicts should be included in this DEIS. 21-8

The same consideration should be given to the natural drainage patterns within the Tennessee Hollow Riparian Corridor. If there is a possibility that future runoff coefficients will increase beyond maximum discharge capabilities of this or any part of the 23-acre Letterman Complex, provisions for upgrading or enhancement should be made now. 21-9

The Lucas proposal anticipates seven acres of lawn with a lagoon, which will, of course, increase water consumption to 64,026 GPD (Table 10), well within the 89,000 GPD limit, but 46% greater than any of the other competing proposals. Irrigation will alone require 20,540 GPD (Table 11). Given the "operating efficiency" and "energy conservation" mandates, wouldn't landscaping with indigenous California plants using drip irrigation or a Japanese garden concept be more acceptable? 21-10

How can the Trust Board consider the concept of a specialized Digital Arts Center and still maintain that existing Presidio security and fire protection is adequate? Specialized facilities, especially computer complexes, require specialized alarm systems and support services. 21-11

Although the Lucas group has designated the Letterman Complex replacement buildings as office and archival space, specific divisions, such as THX, ILM, Lucas Arts, Lucas Online, and Lucas Learning have also been mentioned. I doubt that computerized graphics and digital images will constitute the only work product. For example, the "I" in ILM stands for "industrial." Art and special effects involve everything from paints to polymers to pyrotechnics. Unless, substantial guarantees are given that space will be for office functions only, copies of Material Safety Data Sheets (MSDS) from the Lucas facility in Marin County should be provided, summarized, and included in the final EIS. 21-12

What about fire and earthquake codes? The PTA (Sec. 104[m]), as well as this DEIS mandates compliance only with Federal (national) building codes. The San Andreas Fault, the second largest earthquake fault system in the country after the New Madrid, lies just outside the Golden Gate. Obviously the same potential earthquake and fire damage that haunts San Francisco also threatens the proposed Letterman Complex. Has everyone forgotten what the 1989 Loma Prieta temblor did to the Marina District just three blocks away? Shouldn't the more stringent San Francisco seismic and fire codes be mandated? 21-13

Now let's proceed to the real "sticking point" in this analysis. When I read the original draft 1993 GMPA DEIS, I applauded. Every environmental impact was covered by a corresponding mitigation—except for one—and that was how and who was going to pay. 21-14

Now, the "who" has almost been decided, but sadly, not the "how." The proposed 99-year Lease period sounds more like an agriculture, grazing, or timber lease rather than an urban commercial lease. Certainly an investment recovery period, together with options to renew and provisions for cost escalation set by formula and based upon cost of living or construction indices should be incorporated. While it's understandable that lease negotiations should have some degree of confidentiality, it is also true that because of the significance of the Letterman Complex development and the precedent setting nature of this privatization venture, that lease guidelines be established that are made compatible with the Presidio's 1994 GMPA. 21-14

For example, both the final proposals for the Letterman Complex include private family-run corporations. Although corporations in theory have an unlimited life, few exist beyond a half century. Solely-owned corporations, particularly those built upon the creative genius of a single individual are vulnerable if that individual ceases to be. Succession is not always guaranteed, e.g., families DeBartolo, Haft, etc. Then, too, there is "merger mania." The Presidio Board must seek to guarantee continuity.

The PTA (Sec. 104[c]) requires the Board to develop a comprehensive Management Program. If this has already been done and it covers the specifics of lease provisions, e.g., reversions, conditions, enforcement, etc., together with details of scheduling and financing, it should at the very least be incorporated by reference or summarized in an appendix in this DEIS. 21-15

The bottomline is that guidelines for the lease agreement provisions should be part of the environmental impact mitigation package for the entire Presidio.

In conclusion, in most national park settings, we protect flowers and "furry" friends from the "Publicus Defilicus" but here in the Presidio, because of its uniqueness, and potential for a real estate development give-away, we must also protect against the "Privaticus Exploiticus". Lose this opportunity to preserve the Presidio, and you lose the Presidio forever. Therefore, it's time to use the force (between the ears), Luc.

From a concerned citizen,

Donald R. Beier

Responses to Comments in Letter 21

21-1

To provide more information regarding the financial context of Letterman Complex leasing, the Presidio Trust's July, 1998 Financial Management Program (FMP) is included in the Final EIS as Appendix E. Pursuant to the requirements of the Presidio Trust Act, the Presidio Trust prepared the FMP to demonstrate how the Presidio Trust could become independent of federal appropriations by fiscal year 2013. The FMP includes a description of the implementing policies and financial assumptions and analysis upon which the Presidio Trust's financial projections are based.

The commentor suggests that the Presidio Trust's plan to borrow funds from the Treasury, pay interest-only payments through year 2012, and then amortize the principal and interest as in a 15-year loan creates a "formula for certain failure if tight development schedules are not met or if the privatization of the 'keystone' Letterman Complex falters." The Presidio Trust's approach to use Treasury borrowing early to initiate capital projects allows for generation of the cash flow that will permit future repayment. An "interest-only" period during construction of a project is a typical financing structure. In fact, the length of the interest-only period proposed under the FMP allows a sufficient amount of time (14 years) to establish a revenue flow. It is true, however, that the Presidio Trust must proceed with capital improvements and leasing projects in a timely fashion.

Please note that the commentor misstates the FMP projection of revenue from the Letterman Complex as $44 million, based on $40 per square foot multiplied by 1.1 million square feet. While the FMP used $40 per square foot as a fully serviced rent benchmark in valuing the 23-acre site, it did not expect that the Presidio Trust would collect that rent level. Rather, the Presidio Trust will ground lease the site and secure a revenue from the tenant that takes into account the capital investment required and operating costs of the site. The Trust's financial forecast assumes $5.3 million of revenue from the Letterman Complex. Please refer to master response 10A.

21-2

The commentor's opinion regarding the qualifications of the seven-member Trust Board is noted for the record. It should be pointed out that several of the Board members have particularly strong backgrounds in preservation and protection and are recipients of a number of awards from national environmental organizations. Individual backgrounds of the Board members are available for review on the Presidio Trust's website (http://www.presidiotrust.gov/about/index.asp).

21-3

With respect to the issue of the consistency of the Trust's actions with the GMPA and the need for an amendment to the GMPA, the commentor is referred to master responses 2A and 2B. For a discussion of the Trust's mandates, refer to master response 1A. With respect to the assertion of conflict of interest, refer to master response 9A.

21-4

The Trust does not agree with the commentor's statement that there has been inadequate public notice and hearing opportunities. For a more complete response to this comment, refer to master response 1E and Section 5.1 of the Final EIS.

21-5

Refer to master response 11 for a discussion of how the 900,000 square feet was derived. With regard to the square footage allocated to parking, text has been added to Section 2 of the Final EIS to identify the proposed square footage of structured parking under each alternative.

21-6

The activities and programs proposed under Alternative 5, Digital Arts Center, are adequately described in Section 2.7.2 of the Final EIS. Section 104 (n) of the Presidio Trust Act requires the Presidio Trust to consider the extent to which prospective tenants contribute to the implementation of the GMPA and to the reduction of cost to the federal government. Public outreach programs are an important factor in tenant selection by the Presidio Trust Board of Directors. Note that Section 103 (c) of the Presidio Trust Act specifies that all *properties* administered by the Presidio Trust shall be exempt from all taxes and special assessments of every kind by the State of California and its political subdivisions. The *activities* of tenant organizations are subject to taxation. The Presidio Trust Act authorizes loan guarantees, but does not require their use. The commentor's opinion regarding the substance and permanence of the digital arts industry is noted for the record.

21-7

See master response 18.

21-8

See master response 18.

21-9

Refer to master response 15.

21-10

Turf grass was selected for its ability to withstand foot traffic, and benefit erosion prevention and storm-water management. When used judiciously, and in combination with appropriate maintenance practices, turf grass represents a sustainable design response to expected uses. In Alternative 5, the lawn area would not be a monoculture of turf grass. Instead, turf grass would be limited to the extent required to allow for the informal outdoor activities anticipated, with the balance and majority of the open space, planted in trees, shrubs and lower perennials. A diverse palette of horticulturally appropriate and native plantings designed to enhance educational and interpretive opportunities, and wildlife habitats would be utilized in combination with turf grass. Water conservation would be a primary consideration. Soils would be amended and graded to improve water retention and availability. Where used, the turf grass would be selected from varieties with demonstrated deep roots and relative drought tolerance. A programmable and zoned irrigation system would be installed to supply water at rates and frequencies tuned to individual plant needs and variations of microclimate, slope, and

exposure. Finally, long-term maintenance practices and water use monitoring systems would be established to maintain water conservation over time.

21-11

Based on discussions with the development team for the preferred alternative, the Presidio Trust has no reason to assume that any extraordinary police or fire protection would be required for a Digital Arts Center beyond what was previously analyzed in Sections G.6, Law Enforcement Services and G.7, Fire Protection Services in Appendix A of the EIS.

21-12

No health or safety risks related to the releases of hazardous substances or pollutants are in any way foreseen in connection with the operation of a Digital Arts Center. Any sensitive materials stored onsite such as aerosol containers, paint, solvent and thinners would be managed and disposed of in accordance with the Presidio Trust's Standard Operating Procedure for Hazardous Waste/Materials Management and all applicable federal, state, and local regulations.

21-13

The design for new construction would comply with national building codes, including site-specific seismic criteria, the same as all major structures in San Francisco and other major cities. The 1997 Uniform Building Code is used for newly constructed buildings in San Francisco. San Francisco does not have any more stringent design criteria than any other jurisdiction in Seismic Zone 4 and the Presidio Trust's design criteria for seismic would be that for Seismic Zone 4. The Marina is not comparable to the Presidio since it is fill and loose bay mud; this is not the same material as the ground on which the Letterman Complex is built.

21-14 AND 21-15

Comment noted. NEPA does not require analysis of specific lease terms or review at various implementing steps of a project. However, NEPA does require that federal agencies review major actions that significantly affect the environment as a whole. This necessary environmental analysis for new development at the Letterman Complex is included in the EIS. The Presidio Trust does not agree with the commentor's suggestion that lease guidelines be established that are compatible with the 1994 GMPA. The GMPA is a conceptual land use plan. In executing leases, the Presidio Trust must comply with the requirements of the Presidio Trust Act. Section 104(a) of the Presidio Trust Act requires the Presidio Trust to manage the leasing of property within the Presidio using the authorities provided in the Presidio Trust Act, exercised in accordance with the purposes set forth in section 1 of the Act which established the GGNRA, and in accordance with the General Objectives of the GMPA. For response to the comment concerning a comprehensive management program, please refer to master response 4A.

Letter 22

TRUST REC'D

SAN FRANCISCO BICYCLE ADVISORY COMMITTEE
25 Van Ness Avenue, Suite 345, San Francisco, California 94102

morrrlock@aol.com
415-282-8564

July 24, 1999

Presidio Trust
34 Graham Street
P. O. Box 29052
San Francisco, CA 94129-0052

Attention: NEPA Compliance Coordinator
Letterman Complex

Re: Letterman Parcel

Gentlepeople:

The San Francisco Bicycle Advisory Committee ("BAC") is an advisory body appointed by the Board of Supervisors to deal with issues of bicycle safety and accessibility for both bicycle commuters and recreational cyclists.

The BAC has been following the hearing process surrounding the Letterman Parcel Draft SEIS. We have discussed the document both in general meeting and at sub-committee level. We have elicited and received questions and comments from the public. While we greatly appreciate the efforts made by the Trust so far to ensure good access for bicyclists and pedestrians, based on information compiled to date we would like to express the following concerns:

1. In the configuration now being considered, there is a designed-in excess of parking (1530 versus 1260). This excess is specifically mentioned as a possible obstacle to implementation of a vigorous Transportation Demand Management plan:

> "A surplus in parking spaces could compromise the TDM strategies designed to encourage non-automobile modes, and could potentially result in an increase in vehicle trips to the site." (DEIS, p. 165.)

We urge that the size of the underground garage in question be negotiated downward, and that no excess be permitted which might compromise the implementation of the most effective TDM mitigation measures. 22-1

Presidio Trust
July 25, 1999
Page Two

2. We are concerned regarding the meaning of the words "planned improvements" as used in the following sentence:

> "Planned improvements would enhance the pedestrian and bicycle environment, and facilitate the safe and direct travel of pedestrians and bicyclists to and from the site." (DEIS, Article 4.5.7.4, p. 165) 22-2

What improvements?

We are particularly concerned about access at the Lombard gate and streets to the west (designated on the Official San Francisco Bicycle Route Map as Bike Route 4). The Lombard/Lyon intersection already falls to Level of Service E at evening peak hour, as cited in the DEIS.

3. If there is new signalization at Lombard/Lyon and restriping to provide one left turn lane and one shared right-through lane (p. 36), these changes will dangerously constrict this entrance from the standpoint of safe passage for bicyclists. The gate itself makes widening at this point unlikely. These changes should be made only after safe alternatives for bicyclists have been developed. 22-3

4. With respect to subsections (2) and (3), Mr. Tilles, Transportation Manager for the Presidio, has suggested that a possible solution to these questions and difficulties might be the opening of a new entrance in the Lyon Street wall; perhaps at Greenwich, an entrance which would serve bicyclists and pedestrians alike (and which would also create a better transition from Bike Route 4 east of Lyon than now exists). 22-4

We appreciate any steps in this direction and encourage open dialogue, but regard the DEIS as inadequate for its failure to speak more specifically of and propose mitigation measures for the above-described threats to " . . . the safe and direct travel of pedestrians and bicyclists to and from the site."

Sincerely,

James Morrison
Bicycle Advisory Committee

JM:sgr

Responses to Comments in Letter 22

22-1

Refer to master response 20.

22-2 THROUGH 22-4

The points made about congestion at the Lombard Street Gate and its impact on bicyclists are noted. The Presidio Trust's Transportation Manager agrees that the proposed changes that are necessary for traffic flow and pedestrian safety could adversely impact bicycle flow at the gate. (Please note that current level of service at the Lombard/Lyon intersection has been revised to LOS C in the p.m. peak hour to correct a typographical error that was made in the Draft EIS.) The Presidio Trust is proposing alternative routes for bicycle traffic that is now accessing the Presidio via the Lombard Street Gate. Since Lombard Street is primarily a traffic and transit street and not on the bicycle network, it is not in any case the ideal street with which to be connecting. The city's bike route 6, on Greenwich Street, could enter the Presidio through a break in the Presidio wall at the former Greenwich Street Gate; however, this would be subject to further analysis and is outside of this project's area. Bike route 4, on Francisco Street, would be relocated to Chestnut Street and enter the Presidio through either the Gorgas Avenue Gate or on an expanded bicycle and pedestrian path from the Lombard Street Gate (see new Figure 18 and new mitigation measures TR-6, *Relocation of the City's Bike Route 4*, and TR-7, *Adjustment of Bicycle Entry Points Near the Lombard Street Gate*, in the Final EIS). The precise route, as well as options for route 6, would be investigated under the Presidio Trails and Bikeways Master Plan which is currently under preparation by the NPS and the Presidio Trust and will involve extensive public input in its planning. Please see master response 25.

Letter 23

PRESERVE THE PRESIDIO CAMPAIGN
1278 – 44TH AVENUE
SAN FRANCISCO, CA 94122
415-731-1434 phone
415-753-3877 fax

PRESIDIO TRUST REC'D

3:06

July 29, 1999

NEPA Compliance Coordinator
Attn: Letterman Complex
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

Dear Presidio Trust Board Members:

We, as the present generation, will probably be remembered not by what we build but by what we destroy but could have saved. That thought should frame the Presidio national park issue.

The DEIS is inadequate, incomplete, and misleading. The DEIS should be reissued with an additional period of time for public comment and public hearings. The Presidio Trust Board should have one or more public hearings on the DEIS itself. The Presidio Trust Board should stop meeting behind closed doors to discuss the Letterman development project. 23-1

How has the Letterman DEIS followed all NEPA related regulations, NEPA legal mandates, and NEPA related case law?
Can a detailed analysis be included in the DEIS as an appendix on this subject? 23-2

The proposed massive for-profit $253 million, 1.49 million gross square feet, 23 acre Lucas business park complex, which is equivalent to nearly three Transamerica buildings, will include, if built: 23-3

-836,000 square feet of new commercial office space.
-589,000 square feet of new underground parking space with 1,500 parking spaces.

Page Two

-50,000 square feet of retail space.
-2,500 employees who will utilize 300 residential units with one or more bedrooms within the Presidio national park; and
-Three large buildings.

The proposed lease will be between 90 and 100 years long. This development was the largest project proposed by any developer and provides the least public access of all the proposals. 23-3

National park new commercial development as proposed by the Lucas development team, where a privately held corporation stands to make tens of millions of dollars per year in profits and which will have little to do with enhancing the visitor's park experience, is unprecedented in American history.

Why isn't the true size of this project in the DEIS?
Can you explain clearly why this project is unprecedented in the national park system? 23-4
Why haven't the lease conditions been analyzed in the DEIS? 23-5
Shouldn't the lease also be subject to NEPA review? 23-6
Why isn't the developer preparing a detail EIS for this project? 23-7
Why hasn't an amendment to the GMPA been done before the release of this DEIS? 23-8

The 60-acre Letterman complex is a nationally significant landmark district site, in a national park, because of its 34 historic buildings and its historic cultural landscape.

The original hospital was established in 1898. Soldiers, from every American military conflict for almost a century, were brought here to die, to get well, or to overcome disabilities because they served their country. Letterman hospital was the U.S. Army's largest hospital in World War I, and it was the nation's busiest hospital in World War II. This hospital pioneered the development of physical therapy techniques. 23-9

Now, it is to become the home of an entertainment industry leader that specializes in unreal virtual reality battle scenes where violence is sanitized and romanticized.

The two cannot possibly fit together. A northern California Hollywood entertainment industry complex will devalue why this is an historic national park site.

Page Three

How can the Lucas project be built without harming the historic cultural landscape of the site? 23-9

Wouldn't this project be similar to building on or near a significant Civil War historic site? 23-10

The incompatible and inappropriate industrial-oriented Lucas complex is unambiguously and unequivocally inconsistent with:

-the July 1994 Final General Management Plan Amendment for the Presidio National Park.
-the National Historic Landmark District.
-the 1916 Organic Act that established the national park system.
-the 1972 federal legislation that established the GGNRA.
-the 1996 Presidio Trust legislation. 23-11

Can a detail analysis be completed that clearly identifies how the Lucas project is inconsistent with the five key documents just listed?

Can a detail analysis be completed that specifically identifies how the Lucas project conforms with the five key documents just listed? 23-12

Can the DEIS explain in detail how the preferred alternative conforms with the newly invented, but bogus, four "general objectives of the GMPA" identified on page six? 23-13

Can the DEIS explain in detail how the preferred alternative conforms with the eight objectives listed on page four of the Summary? 23-14

How does the Lucas project deviate from the July 1994 Final General Management Plan Amendment for the Presidio National Park? 23-15

Can an appendix be added to the DEIS that includes all text sections in the July 1994 Final GMPA that relates to the Letterman district in the Presidio? 23-16

Now that a developer has been identified, why can't a new detailed EIS be done on the specific development project? 23-17

Can the nearly century long lease and the decades long conditions be subject to NEPA review and be included in this DEIS? 23-18

According to the Presidio national park July 1994 final general management plan amendment, the Letterman site was designated as a "science and education center" that "will be devoted to issues of health, life, and earth sciences." Letterman, according to the master plan, "will be used to…support research and actions to improve human and environmental health. Life and earth science programs will be explored to better 23-19

Page Four

understand and manage the interdependence of health and environment." The binding master plan also states that the Letterman site "will be dedicated to scientific research and education focusing on issues of human health, including preventive medicine, nutrition, collaborative eastern/western medicine, and health concerns related to the environment." 23-19

The Lucas development is clearly inconsistent with these programmatic objectives.

How is the Lucas project inconsistent with the 1994 Final GMPA?

Park-wide new construction, according to the legally binding July 1994 final general management plan amendment master plan for the Presidio National Park, is limited to a total of 665,000 square feet. The 1.49 million gross square feet of new construction in the Lucas complex alone will be over two times higher than the new construction ceiling established by the park's master plan. In addition, the 1.3 million maximum allowable square footage for the Letterman district which is also established in the park's master plan, will be exceeded if the Lucas development is built. 23-20

Why will the Lucas complex exceed these two ceiling limits?

What other parts of the final GMPA for the Presidio National Park does the Presidio Trust Board and the developer intend to violate or ignore? 23-21

Does the developer and the Presidio Trust intend to follow the final GMPA or not? 23-22

Has the Presidio Trust voluntarily agreed to follow the final GMPA for the Presidio National Park? 23-23

Does the Presidio Trust believe that they are to follow the legally binding final GMPA? 23-24

The fundamentally flawed Presidio Trust Act was signed into law by the President on November 12, 1996. The President said at the time, "It gives us a blueprint for national parks that one day will be able to sustain themselves without government funds."

This law allows the first conversion of a national park into a business park. This law requires, for the first time in American history, that a National Park unit be economically self-sufficient within 15 years or it will be dropped from the park system. This law, again for the first time, removed the National Park Service, with their preservation ethic, from stewardship and control over this national park, except for the small shoreline area. 23-25

Page Five

The Presidio national park legislation, which is an anti-park, anti-environment, pro-privatization and pro-corporate welfare development scheme, is the first step towards dismantling the national park system as we have known it since 1916. This legislation opens the door to other national park units being converted to money-making commercial operations controlled by private interests. 23-25

Why isn't there any analysis of how this will effect the Presidio or the national park system?

How is the Presidio national park unit different from other national park units? 23-26

Why isn't the Presidio under the control of the National Park Service? 23-27

The developer-friendly Presidio Trust has the power to offer corporate welfare to developers through—

-tax credits for rehabilitation projects.
-state and local tax exemptions.
-low interest taxpayer subsidized loans. 23-28
-guarantees to lenders against loss of principle or interest on loans.
-long-term sweetheart leases which are "as good as a sale" as Don Fisher called them.
-huge federal tax dollar inflows into the Presidio for infrastructure improvements, environmental clean-up, and other projects.

How much corporate welfare will the developer receive for this Letterman business park complex?

What tax breaks, rent breaks, tax credits, and other government giveaways are tied up with this huge development project? 23-29

Can all public subsidies involved with this project be disclosed? 23-30

What is the costs to the City and County of San Francisco to deliver public services to this development project? 23-31

The fictitious and deliberately false "general objectives of the GMPA" identified on page six of the DEIS are not in the July 1994 Final General Management Plan Amendment for the Presidio National Park. These so-called "general objectives" were invented without legal mandate, without environmental review under NEPA, without public hearings, and without changing the final, and legally binding, General Management Plan Amendment. 23-32

Why was this done?

What process was followed to make up these self-serving but false "general objectives"? 23-33

Page Six

Will new so-called "general objectives" be created in the future by the Presidio Trust Board? 23-34

Isn't this an abuse of power? 23-35

Why wasn't the GMPA changed legally before pursuing large-scale development at the Letterman site? 23-36

The pro-development, conflict-of-interest riddled, secretive seven-member Presidio Trust Board, which is unelected, unaccountable, and undemocratic, has consistently pursued redevelopment policies that will lead to the first conversion of a national park into a business park in the United States. 23-37

What are the conflict-of-interests that exist, if they exist, for each Presidio Trust Board member concerning the Lucas development project?

How have these conflicts been publicly disclosed? 23-38

What are the professional, personal, and social connections between the Presidio Trust Board members and the Lucas development team members? 23-39

How were Presidio Trust Board members lobbied during the selection process? 23-40

How was Lucas selected behind closed doors? 23-41

George Lucas, who is an out-of-town, multi-billionaire real estate developer, has learned how to market his Star Wars brand name into a large growing business empire. Links to unhealthy fast food chains, merchandizing, and crass consumerism will continue as the business expands. 23-42

Why is this appropriate in a national park setting?

Why should insatiable greed, crass consumerism, and reckless desecration of a historically significant site be tolerated in a national park? 23-43

The Lucas project will convert a national park site into a business park and change public parkland property into, in effect, private property. This massive for-profit, family owned new commercial development complex will have little public access. 23-44

Why is parkland being closed off to the public?

What will be the public access policy for the three large buildings? 23-45

What if Lucas in future years wants to expand his complex? 23-46

What financial information has the Lucas development team withheld from public disclosure? 23-47

Page Seven

Can the DEIS include an appendix which lists all written communications that the Lucas development team has submitted to the Presidio Trust to date? 23-48

What information has the Lucas development team hidden from the public? 23-49

What kind of precedence is being set for future developers who want to exploit the Presidio for new commercial development projects? 23-50

What will be the growth inducing impacts of this development on the national park system, the Presidio national park, and the surrounding residential neighborhoods? 23-51

What programmatic and economic issues concerning the Lucas project were discussed during the two weeks before the announcement? 23-52

Which community and planning groups supported the Lucas project and why? 23-53

Can detail minutes of all meetings where the Lucas development team made presentations before the Presidio Trust Board and Presidio Trust staff be included as an appendix in the DEIS? 23-54

There are two alternatives that need fuller discussion and disclosure:

1.) Reuse of the two large non-historic existing buildings on the site to prevent the waste of millions of federal tax dollars, limited resources, and the extraordinary amount of energy that it took to create these buildings in the 1960's and 1970's. 23-55

2.) Demolition of the two huge non-historic buildings on site and returning the land to open space to create a buffer between the built environment in the Presidio national park and the surrounding residential neighborhoods. 23-56

The executive director of the Presidio Trust claims the selection of the Lucas project was done after a "10-month open, public process". The Presidio Trust Board did not have a single public hearing meeting on the DEIS during the entire public comment period for the DEIS. Involvement does not mean meaningful public participation. Mr. Meadows claims that there were 110 public outreach sessions in 1998 and that "nearly 1,500 people at public meetings" participated in the Letterman project decision. 23-57

Why hasn't the Presidio Trust Board had a public meeting on the DEIS?

Why isn't timely meaningful public participation allowed before the Presidio Trust Board? 23-58

What does the Presidio Trust Board mean when it refers to environmentally sustainable and economically sustainable? 23-59

Can an appendix to the DEIS identify the 110 public outreach sessions for 1998, the subject, and the number of people that attended each session? 23-60

Page Eight

How many had to do specifically with the Letterman development project? 23-61

Of the "nearly 1,500 people", how many unduplicated individuals participated in the Letterman meetings? 23-62

How many of these individuals were lobbyists, development team members, Presidio Trust consultants, and Presidio Trust staff? 23-63

How many members of the public attended Letterman related meetings after subtracting lobbyists, development team members, Presidio Trust consultants, and Presidio Trust staff? 23-64

If the City of San Francisco withdrew City services such as sewage treatment, water supply, transit, and other public services, how would the Presidio Trust provide these services? 23-65

Is the City of San Francisco legally obligated to provide public services to the Presidio national park? 23-66

Would the Lucas project preclude any previously identified alternatives for reconstruction of Doyle Drive? 23-67

Shouldn't the Doyle Drive project be approved before the Lucas development project moves forward? 23-68

Does the Lucas project intend to pay any fees or taxes to the City of San Francisco? 23-69

There is only one page, page 32, where there is a limited bird's eye view of the Lucas complex.

Can the DEIS disclose and include accurate computer images of the development from several vantage points to reveal height, bulk, mass, architecture, vistas, views, shadows, and other features relevant to understanding the impacts of the project? 23-70

Can all the sections of the Final General Management Plan Amendment of July 1994, that relate to the Letterman site, be included as an appendix to the DEIS? 23-71

Can there be a side by side text comparison and analysis between what was envisioned by the Final GMPA for the Letterman site and what has been identified as the preferred alternative? 23-72

Has a project like the preferred alternative ever been built in a national park unit? 23-73

Page Nine

If there are, can the DEIS disclose all similar projects throughout the national park system with gross square footage, location, and functional uses? 23-74

Where did the 47-page "Draft Planning Guidelines" come from? 23-75
Have they been approved by the Presidio Trust Board? 23-76
Were they subject to public hearings and environmental review? 23-77

Can the DEIS define and accurately disclose total gross square footage for total new commercial development which would include the square footage for the underground parking? 23-78

Why should a private for-profit corporation takeover a large part of a national park? 23-79

Wouldn't this global corporation which has world-wide impact dominate the Presidio national park? 23-80

Why should public resources be exploited by private interests seeking private profit? 23-81
Isn't it inappropriate to turn over part of a national park to a private corporation? 23-82
Isn't this project a betrayal of what a national park unit is suppose to be? 23-83

Why are heavy-handed private sector market forces being allowed to come into the Presidio? 23-84

Market forces—seeking profits, natural resources, and public subsidies—are exploiting and plundering an irreplaceable, priceless scenic and historic park area. Muir and Thoreau helped establish the national park system to protect places from the ravages of development, to take lands off the market forever, and to ensure public control. The Presidio Trust is moving in the opposite direction in all three areas.

If the Presidio Trust cannot operate successfully like other national park units throughout the country with a clear preservation mission, then the Presidio Trust legislation needs to be changed and the current Presidio Trust members need to be removed.

The five-year-old, all volunteer, San Francisco-based Preserve the Presidio Campaign is working to:

Page Ten

1.) Recruit public interest attorneys to bring timely environmental litigation in U.S. District Court to delay or block new commercial development in the Presidio national park.
2.) Prevent privatization of the park in which valuable public resources are turned over to private corporate interests.
3.) Preserve the unique natural, recreational, cultural, historic, and scenic attributes of the park unimpaired for future generations.
4.) Amend the fundamentally flawed business-park oriented Presidio Trust legislation.

Sincerely,

Joel Ventresca, Chair

Responses to Comments in Letter 23

23-1

The comments are noted for the record. For response to the comment concerning the Trust's and the Board's public outreach process, refer to master response 9B. Refer also to master response 1E and Section 5.1 of the Final EIS.

23-2

For response to the general question about the Trust's compliance with NEPA, refer to master response 1B. Also, please see master response 1D.

23-3

As summarized in Table 1, the EIS appropriately analyzed the environmental impacts of six alternatives including four that would entail 900,000 square feet of replacement construction and associated parking on a 23-acre site. The true size of each alternative is represented in the EIS. For response to the comment concerning the effect on visitor experience, refer to master response 25.

23-4

For response to the question seeking a basis for such a unique project in a national park, refer to master response 8 and Section 1.1 of the Final EIS.

23-5 AND 23-6

Because there are no lease conditions to analyze, there is no such obligation under NEPA. Please refer to the response to comment 21-14.

23-7

Under NEPA, the responsibility for the scope and contents of an EIS rests with the federal agency and not the developer in order to avoid a conflict of interest. The EIS contains sufficient site-specific information relevant to adverse impacts for decision-making.

23-8

On the question of an amendment to the GMPA and on the consistency of the Trust's actions with the GMPA, the commentor is referred to master responses 2A and 2B. See also master response 4A.

23-9

Refer to master responses 7A and 23.

23-10

The Presidio is a National Historic Landmark district, as stated and described in the Final EIS, and the features and elements which contribute to the landmark status are documented in the 1993 National Historic Landmark Update. Construction at the Presidio is not similar to new construction on or adjacent to a significant Civil War site; the only similarity between the two places is that they may both be listed on the National Register of Historic Places. New construction at the Presidio, in accordance with the provisions under the National Historic Preservation Act, must be compatible with the historic setting to ensure there is no adverse effect on the

Landmark status. Conformance with the Final Planning Guidelines and later Design Guidelines is intended to ensure that new construction is compatible with the historic district. Furthermore, the design development process will include consultation with the SHPO, ACHP, and NPS as detailed in the Programmatic Agreement in Appendix F of the Final EIS.

23-11

The Trust believes it is complying with all the laws applicable to the actions it takes. For response to the comment concerning the Trust's compliance with the Trust Act, refer to master response 1A; and concerning the Trust's compliance with the NPS Organic Act, the GGNRA Act, and the National Historic Preservation Act, refer to master response 1C. With respect to compliance with the GMPA, the commentor is referred to master response 2A.

23-12

Refer to the response to comment 23-11. Also, please see master responses 1A, 1C, and 2A.

23-13

For response to the comment that the Trust identified "bogus" general objectives of the GMPA, refer to master response 3A. On the consistency of the Trust's actions with the GMPA, refer to master response 2A. With respect to how the preferred alternative conforms to the General Objectives of the GMPA, the commentor is referred to master response 3B. In sum, the Trust believes that the Digital Arts Center (Alternative 5) conforms to the General Objectives of the GMPA (see Section 4.5.1.1 of the Final EIS) as well as a number of the more specific goals and planning principles of the GMPA (see Section 4.5.1.2 of the Final EIS).

23-14

The commentor requests the Trust to state how the preferred alternative meets each of the eight objectives listed on page iv of the Letterman Draft EIS. The first concerns consistency with the purposes of the GGNRA Act, which is discussed in master response 1C, and with the General Objectives of the GMPA, which is discussed in master response 2A. The second objective concerns responsiveness of the preferred alternative to the requirements of the Trust Act, which is discussed in master response 1A, and in Section 1, Purpose and Need in the Final EIS. The third objective addresses the user's ability to finance the project, which was determined by the Trust Board from financial disclosures made as part of the Letterman RFQ/RFP proposal presentations (see Section 2.1 of the Final EIS). The financial needs and assumptions for the Letterman project are more fully discussed in master responses 5 and 10A and in Section 1.2.2, Achieving Financial Self-Sufficiency. With respect to the fourth and fifth objectives, furthering the Presidio goals and involvement in identified desirable sectors, the proponent for the preferred alternative has presented a proposal that includes working in the arts, communication, research and education, as well as constructing structures and operating those structures in an environmentally sustainable manner (see Section 4.5.1.2, Consistency With Approved Plans and Policies). With respect to the last three objectives, through the Programmatic Agreement, the Trust would oversee new design and site any new construction to be compatible with the Presidio's National Historic Landmark status (see master response 7B and Section 1.2); the proponent would participate in a transportation demand management program for the Presidio, and would take actions to reduce automobile use by employees

and visitors (master response 19); and would construct and operate any structures in an environmentally sustainable and responsible manner (refer to the Planning Guidelines in Appendix B of the Final EIS, which would guide the development at the Letterman Complex).

23-15

The inconsistencies of the Digital Arts Center with the July 1994 GMPA are discussed in Section 4.5.1.2 of the EIS.

23-16

The commentor is referred to Appendix A of the EIS for a discussion of all impact topics that are addressed in site-specific detail for the Letterman Complex in the GMPA EIS.

23-17

A new detailed EIS is unnecessary because this EIS contains sufficient site-specific information for reviewers to evaluate and compare a range of development projects, including the preferred alternative, which mirrors the specific development project in question. Under applicable regulations governing NEPA, a preferred alternative is always identified in either the Draft EIS or Final EIS (unless a specific statute provides otherwise, which is not the case here).

23-18

Please see master responses 23-5 and 23-6.

23-19

For a complete discussion of the relationship of the Letterman project to the GMPA, please refer to master response 2A and Sections 1.1 and 1.2 of the Final EIS. Also see response to comment 23-15.

23-20

Please refer to master response 11.

23-21

The Trust's compliance with the GMPA and its General Objectives is discussed in master responses 2A, and 3A and 3B. The Trust has relied upon the GMPA as its master plan, and has proposed this project as a rational means of satisfying the requirements of the Trust Act while at the same time implementing the GMPA consistently with its General Objectives. See Section 1.2 of the Final EIS.

23-22 THROUGH 23-24

Yes. The commentor is referred to master response 2A for a more complete response.

23-25

The commentor's opposition to the Trust's enabling legislation and concerns about the Presidio are noted for the record. Both the GMPA EIS and this EIS analyze how the contemplated action would affect the environment of the Presidio. An analysis of the effect of the Trust Act upon the national park system is beyond the scope of the contemplated site-specific action and beyond the Trust's authority. For further response to the comment, refer to master response 8 and Section 1.1 of the Final EIS.

23-26

For response to the question concerning how the Presidio differs from other national parks, refer to master responses 1A and 8.

23-27

For response to the question why the Presidio is not under control of the NPS, refer to master responses 1A, 1F, and 8. In addition, for further information on the reasons for creation of the Trust and for transfer of a portion of the Presidio land and buildings from the jurisdiction of the NPS to that of the Trust, the commentor is directed to House Report 104-234, as issued on August 4, 1995 by the U.S. House of Representatives and to the discussion in Section 1.1 of the Final EIS.

23-28

The Presidio Trust Act and other federal legislation provide for a range of specific legal authorities and programs, including those alluded to by the commentor:

- *Federal Historic Rehabilitation Tax Credit* – This federal income tax credit program is available to qualified entities that rehabilitate eligible historic properties nationally. New replacement construction at the Letterman Complex would not be eligible for this program.
- *State and Local Tax Exemptions* – Section 103(c) of the Presidio Trust Act states that the properties administered by the Presidio Trust shall be exempt from all taxes and special assessments of every kind by the State of California and its political subdivisions. It should be noted that services typically provided by municipal government (police, fire, emergency medical, infrastructure maintenance, etc.) are provided by the Presidio Trust. The *activities* of Presidio tenants are not exempt from state and local taxes.
- *Loans and Loan Guarantees* – To augment or encourage the use of non-federal funds to finance capital improvements on Presidio properties, the Trust Act authorizes the Presidio Trust to make loans, subject to appropriations, to the occupants of Trust-managed property, for the preservation, restoration, maintenance, or repair of such property. The Trust Act also authorizes the Presidio Trust to guarantee lenders against loss of principal or interest on any loan, subject to approval of terms by the Secretary of the Treasury and other requirements stated in the Trust Act. Presidio tenants may also be eligible for other loan or loan guarantee programs administered by other agencies.
- *Long-Term Leases* – The Presidio Trust may enter into long-term leases. Long-term leases allow for an appropriate return on tenant investment in building rehabilitation or new construction.
- *Federal Investment in Infrastructure Improvements, Environmental Cleanup, and Other Projects* – As anticipated by the Trust Act, the Presidio Trust will invest congressionally-appropriated funds to maintain and manage those areas of the Presidio under its jurisdiction as part of the national park system prior to reaching financial self-sufficiency. Pursuant to the Base Realignment and Closure Act, the Department of the Army has a legal responsibility to fund the environmental cleanup of the Presidio.

The Presidio Trust disagrees with the commentor's opinion that the aforementioned legally authorized lease terms and funding/financing programs are "corporate welfare."

23-29

The Presidio Trust would not execute a lease for the 23-acre site until completion of the entire EIS process. Accordingly, there is no specific response to the commentor's request for information related to a lease agreement.

As stated in the Request for Qualifications to lease the 23-acre site, the Presidio Trust expects market rent, payment of a service district charge to fund the cost of police, fire, emergency medical, and infrastructure services provided by the Presidio Trust, and payment of all applicable fees and taxes.

23-30

The Presidio Trust disagrees with the commentor's opinion that there will be public subsidies of proposed development within the 23-acre site.

23-31

The costs to the City and County of San Francisco for providing services to the Letterman Complex were considered as part of the analysis presented in the Impacts on City Services section on pages 168 through 172 of the GMPA EIS from which the Draft EIS tiers. The current development project would not result in any additional costs that would accrue to the city of San Francisco that were not previously analyzed in the GMPA EIS.

23-32

For response to the comment concerning the General Objectives of the GMPA, refer to master responses 3A and 3C.

23-33

For response to the question concerning the process followed to identify the general objectives of the GMPA, refer to master response 3A. Also, please see master response 3B.

23-34

The process of identifying the General Objectives of the GMPA is discussed in master response 3A. The General Objectives of the GMPA were not "created" by the Presidio Trust Board; rather, Congress directed that the Presidio Trust follow the General Objectives. As those general objectives already exist implicitly within the GMPA, the Trust has, in an exercise of its administrative discretion, ascertained the General Objectives but cannot "create" general objectives in the future. For further response to the comment, refer to master responses 3A and 3C.

23-35

For response to the question concerning the Trust's authority to identify the General Objectives of the GMPA, refer to master response 3A.

23-36

For response to the comment concerning changing the GMPA before pursuing development at the 23-acre site, refer to master response 2B, and refer to master response 2A for a discussion of the conformity of the Trust's decisions with the GMPA.

23-37

For response to the comment concerning asserted conflicts of interest, refer to master response 9A.

23-38

There is no conflict of interest that requires disclosure. For further response to the comment, refer to master response 9A.

23-39

For response to the comment, refer to master response 9B. This comment does not address issues related to the NEPA analysis. The NEPA regulations provide that comments on an EIS need only address the adequacy of the statement or the merits of the alternatives discussed or both.

23-40

Please refer to master response 9B and response to comment 23-39.

23-41

Please refer to master response 9B and response to comment 23-39.

23-42

The commentor is referred to Section 4.5.1, Consistency with Approved Plans and Policies, for a discussion as to how the Digital Arts Center is appropriate in a national park setting. Please also see Sections 1.1, 1.2, 2.1, and 2.2 of the Final EIS.

23-43

Please refer to the response to comment 23-42.

23-44

Public access impacts of the alternatives are addressed in Sections 4.1.8.5, 4.2.8.7 through 4.5.8.7, and 4.6.8.5 (Effect on Visitor Experience) within the Final EIS. The preferred alternative's 7-acre public lawn would be a significant open space addition to the park and would be accessible to all park visitors. Also, see master response 25.

23-45

The public would not be able to access the building interiors, except for the public lobby spaces and any other public amenities. See master response 25.

23-46

No additional new construction beyond the proposed 900,000 square feet in Alternative 5 is contemplated. Under all alternatives analyzed, the total square footage for the entire 60-acre Letterman Complex would not exceed 1.3 million square feet. Any proposal for future additional space would be subject to further environmental analysis.

23-47

This is not a NEPA issue.

23-48

Please refer to master response 9B and response to comment 23-39.

23-49

For response to the comment, refer to master response 9B and response to comment 23-39.

23-50

For response to the comment concerning the precedential effect of the proposed action, refer to master response 8. In addition, for future projects at the Presidio, the Trust would continue to use the GMPA and its General Objectives as foundations for planning decisions. Refer also to master responses 2A and 9B.

23-51

The commentor is referred to Section CC, Growth-Inducing Impacts in Appendix A of the EIS for this analysis.

23-52

The Presidio Trust assumes the commentor is referring to the Presidio Trust's June 14, 1999 announcement identifying the Digital Arts Center as the preferred alternative in the Draft EIS. Please refer to Section 2.1.3 of the Final EIS.

23-53

Letters submitted by community and planning groups to the Presidio Trust in support of the preferred alternative or other alternatives have been made a part of the administrative record and are available for review at the Presidio Trust library.

23-54

Refer to response to comment 23-39. Also, please see master response 9B.

23-55

Please refer to master response 6A and Section 2.2 of the Final EIS. Also see Section 1.2.2 of the Final EIS. Section 4.1, Environmental Consequences: Alternative 1, discusses the impacts of rehabilitating and reusing the LAMC and LAIR buildings. The impacts of demolishing these buildings are discussed in Sections 4.2.2, Solid Waste, and elsewhere within the EIS.

23-56

Please refer to master response 6A and Section 2.2, Alternatives Considered but Rejected, and specifically, Section 2.2.3, Remove LAMC and LAIR Buildings and Restore to Natural Conditions, for a discussion of impacts related to demolishing the LAMC and LAIR and returning the land to open space. Alternatives 1 through 5 would all include a buffer to minimize impacts on the surrounding neighborhood. Also, see master response 17, Impact on Quality of Life of Neighbors.

23-57

For response to comment concerning opportunities for public hearings on the Letterman project, refer to master responses 1E and 9B, and Section 5.1 of the Final EIS.

23-58

The Trust disagrees with the commentor, and believes that the public has had opportunities for meaningful participation. For further response to the comment, refer to master responses 1E and 9B, and Section 5.1 of the Final EIS.

23-59

The commentor is referred to the definition of "sustainability" contained in the Glossary of the EIS. Further explanation of environmental sustainability is contained in Section 1.4.9 of the Final EIS as well as within Sections 2.3.6 through 2.8.6 (Environmentally Sustainable Practices). The term "economically sustainable" is identified in one of the Presidio Trust's General Objectives of the GMPA (Section 1.1.5), is embraced in the goals of the Financial Management Program (Appendix E of the EIS), and is further defined as economic self-sufficiency.

23-60

The Presidio Trust Act authorizes the Board to establish procedures for providing public information and opportunities for public comment regarding policy, planning, and design issues through the GGNRA Advisory Commission. By Resolution 98-16, the Presidio Trust Board of Directors formalized the role of the Advisory Commission as a body to hear public comment on significant Presidio Trust land use issues. A member of the Presidio Trust Board of Directors also serves on the Advisory Commission, acting as a liaison. The Executive Director of the Presidio Trust and other Trust staff attend Advisory Commission meetings and report back to the Board of Directors.

The Presidio Trust hosted or participated in a total of 15 public meetings and workshops related to Letterman Complex planning, the RFQ/RFP process, and the EIS process through August 1999. In addition, Trust staff attended public meetings of neighborhood and civic groups to discuss and answer questions about the Letterman project. The Presidio Trust attended at least 60 outreach sessions in 1998. These covered a variety of subjects in addition to the proposed Letterman project. The information requested by the commentor is available for review at the Presidio Trust Library (filed as the Letterman Public Outreach list). See master response 1E.

23-61 THROUGH 23-64

These comments do not address issues related to the NEPA analysis. The comments are noted for the record and will be considered by the Presidio Trust in its deliberations.

23-65

The Presidio Trust would own, operate, and maintain these services within the Presidio. The Presidio Trust's goal is to connect all users, including those at the Letterman Complex, to its water, wastewater (currently in the planning stage), and stormwater systems. This would decrease the historic demand for these services from the city. However, it is likely that emergency connections between the city and Presidio systems would be maintained. The commentor is referred to the separate discussions in Section 4 (Water Supply) in the main body and Section G (City Services) in Appendix A of the Draft EIS, and the Impacts on City Services section on pages 168 through 172 of the GMPA EIS for additional discussion of this issue.

23-66

This comment does not address issues related to the NEPA analysis. The city of San Francisco is required by law to provide certain public services. Please see the response to comment 23-31.

23-67 AND 23-68

Refer to master response 21.

23-69

This comment does not address issues related to the NEPA analysis. The Letterman developer would pay fees and taxes that it is obligated to pay. Please see the response to comment 23-31.

23-70

Refer to master response 24.

23-71

The Final General Management Plan Amendment it its entirety is available in the Presidio Trust Library.

23-72

The commentor is referred to Table 11, Summary of Environmental Consequences in the Final EIS.

23-73

It is not known whether a similar action has been undertaken in another national park unit. Refer to master response 8.

23-74

See the response to comment 23-73.

23-75

The Planning Guidelines were prepared cooperatively by the Presidio Trust, NPS staff, and the consulting firm Simon Martin-Vegue Winkelstein Moris.

23-76

The Planning Guidelines were reviewed by the Presidio Trust Board prior to circulating the Draft EIS and identifying the preferred alternative. The Record of Decision following publication of the Final EIS would constitute approval of the Planning Guidelines when they are adopted as part of the agency's decision. They would also be included in the consultation package referenced in the Programmatic Agreement (Appendix F).

23-77

The Planning Guidelines were first introduced at the January 27, 1999 public scoping session for the project, and were included in the Draft EIS for public review and comment. Please refer to Section 1.4 of the Final EIS for a more complete discussion of the relationship of Planning and Design Guidelines to the Letterman project.

23-78

Please see the response to comment 23-3.

23-79

A Digital Arts Center would use 23 acres, or 1.5 percent, of the 1,480-acre Presidio. Of the 23 acres, the buildings would be concentrated on 8 acres so that 15 acres would remain as open space, including a 7-acre Great Lawn for public use and enjoyment. See master response 25 with regard to public access. The tenant organizations within the 23-acre site would be within a larger diverse community of other residential and non-

residential tenants. The Presidio Trust does not agree that this constitutes "takeover of a large part of a national park." The Presidio Trust Act does not require the Presidio Trust to consider for-profit or non-profit status as a basis for tenant selection. Also see master response 1A. Please also refer to Sections 1.1 and 1.2 of the Final EIS for a discussion of the purpose and need for this Letterman project

23-80

See the response to comment 23-79.

23-81

The Presidio Trust disagrees with the commentor's premise that public resources are being exploited by private interests seeking private profit. The Presidio Trust Act requires the Presidio Trust to lease properties at the Presidio in order to generate revenues to preserve the Presidio as a part of the national park system. The tenant of the 23-acre site would pay fair market value for the use of the site. Refer to Sections 1.1 and 1.2 of the Final EIS for more complete discussion.

23-82

See the response to comment 23-79.

23-83

See the response to comment 23-81.

23-84

See master response 1A and Sections 1.1 and 1.2 of the Final EIS.

23-85

The commentor's dismay with the Presidio Trust and its enabling legislation, and concerns about the Presidio are noted for the record.

Letter 24

-----Original Message-----
From: SmallSally@aol.com [mailto:SmallSally@aol.com]
Sent: Thursday, July 29, 1999 11:24 PM
To: presidio@presidiotrust.gov
Subject: Letterman site

Dear the Presidio Trust,

I heard this evening from the National Parks and Conservation Association, that while the decision has been made to go with the Lucasfilm plan for the Letterman site, this decision has been made before the official end of the NEPA public comment period has closed. While I understand the fiscal imperatives of getting Presidio sites leased out, I am concerned to hear that legally mandated processes are being short-circuited. I am also concerned that such a strong supporter of the National Parks is concerned about the Trust's decision for how to develop the Letterman site. Something seems quite wrong if the Trust is at odds with the NCPA, and so early in the Trust's tenure, it causes me to worry about the Trust's future! 24-1

Since the public comment period on the Letterman site is still officially still open, I'd like to take this opportunity to register my concern about the Lucasfilm plan as well. My concerns are several-fold: If anything happens to Lucasfilms, such that they are not able to continue as a tenant, the Trust will be left holding a large chunk of real estate to re-lease, and some of that space will undoubtedly be rather specialized in configuration and not readily leasible without significant modification. On the other hand, a multiple-tenant scheme, even if something happens to the prime developer, has smaller parcels of general office space that would be much easier to re-configure and re-lease quickly. The Presidio is a National Park site, and a multi-use scheme allows for more public use and interation with the Presidio, while the Lucasfilm use would be essentially closed to anyone but employees. I understand one probable tenant of the multi-use scheme was the Sutro Library. I am a user of the Sutro Library, and would love to see it located in the Presidio! I also do not see how Lucasfilm furthers the sustainability and social goals of the NPS master plan and of the Trust. The multi-use plan, however, has a number of tenants that have educational and other goals that align quite nicely with NPS and Trust goals. 24-2

Sites such as Fort Scott, which, due do its location, is much less accessible to the public, seems much more suitable for "closed" uses such as Lucasfilm. The much more easily accessible site of Letterman is better utilized by more public-oriented uses. 24-3

I know the neighbors surrounding Letterman would prefer the quieter, more-or-less-just-in-the-weekday-daytime use of Lucasfilm, rather than a higher volume, daily use that a community college with evening classes, and other more public uses would generate. However, the Presidio is a National Park, not a neighborhood park, and I strongly feel the uses the site is put to should reflect broad social uses, and not just the use by a select well-off few. 24-4

Also, it doesn't sound as if the Trust has attempted to find other alternatives to solve these concerns. They seem stuck in a take-it-or -leave it approach to dealing with potential developers. While I know the Trust would like to deal with a single developer for the site and/or a developer needs to have the whole site to make such a development viable from their end, there still seems like there should be more room for negotiation with the potential developers to resolve the various concerns that have been raised. 24-5

I hope the Trust will consider my views above during this public comment period, and I especially hope the Trust complies with all NEPA and other legally-mandated public review and comment processes. My hope for this is not just for the sake of following procedure, but also out of concern for possible - perhaps long and costly - challenges that could be raised if proper proceedures aren't followed. The Trust has a great challenge in making the Presidio fiscally self-sustaining and it doesn't need any additional obstacles. I also hope the Trust can conduct it's business in a way that keep the public well informed and maintains good working relationships with such groups as the NPCA. The Trust doesn't need to alienate anyone. 24-6

I lived on the Presidio for a year, a few years ago, and I have very special feeling for the Presidio. I would like to have more reasons to come back to the Presidio, but I doubt I will be visiting Lucasfilm for any reason in the future. On the other hand, I would definately come to visit the Sutro Library, and might have dealings with other possible tenants in the multi-use scheme. I would think money being spent in the eateries and such that would be part of a multi-use scheme should also figure into the finacial sustainability of the Presidio, while, again, the Lucasfilm use would be a rather closed use.

Sincerely,
Sally Small
San Francisco resident

Responses to Comments in Letter 24

24-1

For response to the comment concerning the apparent selection decision during the public comment period, refer to master response 6B.

24-2

The majority of buildings proposed under the preferred alternative are office use, which is a readily adapted floorplate for other users, should tenants change. All of the alternatives allow for public access within and around the buildings. As discussed in Section 2.7 (Alternative 5: Mixed-Use Development), the preferred alternative incorporates components of public access through the creation of a 7-acre Great Lawn open to the public, retail amenities such as a coffee house and café, and access to lobby/reception spaces (consistent with other tenant occupancies on the Presidio).

With regard to the comment about furthering the Presidio's goals for sustainability, please refer to Section 2.7.6, Environmentally Sustainable Practices, which describes the preferred alternative's incorporation of sustainable design practices into the overall concept. Furthermore, the proposed project would be subject to Design Guidelines for the architecture and landscape, which would include adherence to the U.S. Green Building Council's Leadership in Environmentally Efficient Design Guidelines.

In response to the comment on social and educational goals in the preferred alternative, please refer to the response to comment 18-6.

24-3

Please refer to master response 25. The preferred alternative incorporates a variety of public amenities and allows for public access beyond what currently exists on the site. Please refer to master response 25 and Sections 1.1 (Background) and 1.2 (Purpose and Need) within the EIS with regard to the need for the proposed project at the 23-acre site.

24-4

Comment noted. The alternatives analyzed present a range of uses that could occur at the site and the preferred alternative incorporates a variety of educational and publicly accessible features within its design. See response to previous comments.

24-5

The Presidio Trust considered a number of alternatives to satisfy the goals of the project as discussed in Section 1.3 (Goals). However, for the reasons given in Section 2.2, each alternative was determined not to merit detailed analysis in the EIS. See Section 2.1 (Development of Alternatives) and Section 2.2 (Alternatives Considered but Rejected) for more complete response to the comment.

24-6

The Trust is taking all comments received into consideration. For response to comment concerning the Trust's compliance with applicable law and public participation process, refer to master responses 1A, 1B and 1E and response to comment 7-1.

Letter 25

-----Original Message-----
From: slrcnorwood@igc.org [mailto:slrcnorwood@igc.org]
Sent: Friday, July 30, 1999 12:22 AM
To: presidio@presidiotrust.gov; sseay@npca.org
Subject: Presidio Needs Your Help by August 2

Dear NEPA Compliance Coordinator,

I am an architect and planner, and the Executive Director of the Shared living respurce Center, Inc.
and am committed to ecological designed and comprehensively planned sustainable development that takes into account all the factors that have been advanced by the NPCA
and other support groups. I am deeply concerned about how the Presidio Trust has overriden the trust proplc had placed to them for
carrying out the earlier public inpute d mandates for sensitive, balanced, natural preservation, etc. Presidio managment.
My earlier letter to the Presidio Trust protesting the Lucus choice still stands as my expression of support for a public review of the Presidio Trust process. 25-1

Open Memo to Organizations and Media Concerning the
Presidio Letterman Site Development Plan 6-21-99
This copy of my letter to the Presidio Trust brings out some issues regarding the Presidio Trust development decision that I feel have not been brought out for public scrutiny. I want you to know why as a planner and architect I recommended that the Shorenstein/Interland proposal is the most economically, socially, and environmentally sustainable plan and will better benefit the local neighborhoods and regional community than will the Lucus plan. There may still be time to over ride the Lucus decision. If you have questions of feedback please call me: Ken Norwood AICP, Executive Director, Shared Living Resource Center, Inc. 510-548-6608, <slrcnorwood@igc.org>
<www.sharedliving.org>
– Copy –
Mr. Jim Meadows, Executive Director, Presidio Trust June 1, 1999
Building 34, Graham Street, P.O. Box 29052
Presidio of San Francisco, CA 94129 RE: Supporting "Presidio Village" Plan

Dear Mr. Meadows and all the Presidio Trust Members

We are following up earlier SLRC statements regarding Presidio planning and development in which we supported an integration of socially, economically, and environmentally sustainable precepts and practices From the time the Presidio was transferred to the National Park Service in 1989 and through to the Presidio Trust formation we have contributed commentary on the reuse of the Presidio, including historic preservation, human scale, social interaction, spatial openess, housing, pedestrian circulation, wild life protection, and compatible integration of existing and new plant life. The Presidio is a national and regional resource and must serve the broad public realm. We strongly recommend the "Presidio Village" proposal by Shorenstein/Interland group because it is more capable of embracing the above principles, and for the following reasons, including opposing comments about the Lucus plan. 25-2

1. The mixed-use composition of residential, office, and retail, will provide social, cultural, and economic diversity, as opposed to the monolithic single purpose Lucus plan that we are concerned will tend to create isolation and alienation from the adjacent Presidio uses, and users.

2. The village cluster layout contributes to a more intimate, pedestrian, and human scale that allows a sense of spatial openess to flow around and through the various clusters, as opposed to the Lucus plan which conveys a monolithic, monumental, regimented feeling creating the antithesis of a " Village." 25-3

3. The combination of larger and smaller open spaces, courts and pedestrian circulation corridors are more people friendly and offer accessible linkages to Presdio neighbors, but the Lucus proposal for a "great lawn" is not conducive to sociability, but rather appears to be intimidatingly large and more like the grounds of an "intensely private" medieval castle. 25-4

4. The auto traffic generating impact is somewhat better mitigated by the mixed use development plan which if properly leased to compatible users with interactive purposes could carry out the "Presidio Village" concept with more self-sufficiency, whereas the Lucus plan will generate more commute traffic from longer distances (existing employees), impact the local shortages, and very likely generate more trucking activity, day and night. 25-5

We are also greatly concerned about the traffic generating impact upon San Francisco's and the region's already saturated highway network by the inclusion of up to 1390 to 1500 parking spaces. Neither project proposal, nor the Presidio Trust in its mandate to become self-sustaining by 2013, have apparently included a traffic management plan that would drastically reduce parking and contribute towards a rail and bus program that could serve many other San Francisco neighborhoods, work centers, and popular attractions. This lacking by the Presidio Trust could be the achilles heel for reaching the 2013 goal. The voters could say that "environmental sustainability should take precedence over economic sustainability,"(Gov. Davis). Although we support the Shorenstein plan we stress that auto dependency begets more gridlock. That serious flaw must be faced before allowing any Presidio development. 25-5

Ken Norwood AICP
Executive Director, Shared Living Resource Center, Inc.

Responses to Comments in Letter 25

25-1

Thank you for your letter. The commentor's preference for Alternative 4 (Live/Work Village) is noted for the record.

25-2

The Presidio Trust has relied upon the reuse plans of the GMPA as colored by the Trust Act requirements in proposing the Letterman project. See Sections 1.1 and 1.2 of the Final EIS. The preferred alternative includes a diversity of uses and a variety of publicly accessible amenities and spaces (please refer to master response 25). In addition, the site plan for the preferred alternative would be subject to a planning and design review process that would examine design refinements to ensure greater consistency with the Planning Guidelines as well as the future Design Guidelines (see mitigation measure CR-1). The Planning Guidelines set forth principles about land use and public access whose application would ensure against "isolation and alienation from adjacent Presidio uses." See master responses 7A and 7B with regard to the Planning Guidelines and future design review.

25-3

Comment noted. Please refer to response to comment 25-2. In addition, the preferred alternative provides a 7-acre lawn around which the buildings would be located. This lawn is a new public amenity to the site and would provide opportunities for pedestrian-level, human-scale interaction. In addition, final designs would comply with Planning Guidelines as well as the future Design Guidelines, which include several design principles related to scale, character, and patterns of development being compatible with existing development and providing public access.

25-4

Comment noted. The 7-acre lawn would be open to the public and would be accessible from a variety of directions. In addition, the break in the historic wall at Chestnut Street would allow for new pedestrian access to the site. The final design of the landscape as well as the architecture would be subject to review and consistency with both the Planning Guidelines, in Appendix B of the EIS, and Design Guidelines. Regarding concerns of sociability and the size of the grounds, see master response 25.

25-5

Based on discussions with the development team for the preferred alternative, the employee commuting profile is not expected to be different than that assumed for all alternatives in the EIS. Also, given the nature of a Digital Arts Center, very little truck traffic would be generated.

25-6

Refer to master response 19.

Letter 26

-----Original Message-----
From: K. Fitch [mailto:kfunlimited@hotmail.com]
Sent: Saturday, July 31, 1999 6:14 PM
To: planning@presidiotrust.gov
Cc: PRKSRUS@aol.com
Subject: Preferred Alternative, Notice of Identification

The Notice of Identification of the Preferred Alternative (which I have just received) is indeed correct in citing "public confusion regarding the continued viability of Alternatives 1, 2, 3, 4, and 6."

Indeed, had I not received this notice, I would not have known that there was still any serious consideration of ALL the alternatives at this time.

- The media, some volatile members of the public, and The Presidio POST (read the first paragraph of its account) have presented the situation somewhat differently. 26-1

If FULL comment on ALL the Alternatives is indeed desired by The Trust, it would be wise to extend the comment period further.

The current confusion is not beneficial for The Presidio Trust, The National Park Service, or The Preferred Alternative and its Potential Tenants.

Sincerely,

Ken Fitch
FPPL

NOTE: The considerable energy generated by the unique and special possibilities of The Preferred Alternative and its celebrity associations could also attract an unfortunate hostile backlash if the process is not fully accessible and thoughtfully presented. 26-2

Responses to Comments in Letter 26

26-1

Thank you for your message. The notice referred to in the comment was sent to 735 individuals and organizations on June 18, 1999. It is unclear why the commentor received the notice 43 days later. After consultation with the U.S. EPA, the Presidio Trust elected to extend the prescribed comment period until August 2, 1999. Both agencies concurred that a full 45-day extension would be sufficient to allay public confusion regarding the Trust's alternative selection process.

26-2

Comment noted.

Letter 27

-----Original Message-----
From: Sami Iwata [mailto:sami.iwata@awl.com]
Sent: Sunday, August 01, 1999 3:21 PM
To: planning@presidiotrust.gov
Subject: Letterman Complex EIS comments

August 1, 1999

NEPA Compliance Coordinator
Attn: Letterman Complex
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

Dear Presidio Trust Board Members:

I am writing to voice my concern over the large scale private development under consideration for the Letterman Complex. The draft EIS (DEIS) is completely inadequate, consistently omits key information, and is fundamentally misleading. The DEIS should be reissued with an additional time period for pubic comment and several public hearings hearings held by the Presidio Trust itself. The Presidio Trust Board should stop meeting behind closed doors to discuss the Letterman development, the Presidio National Park belongs to all of us. 27-1

Here are my comments that I would like to see addressed by the Presidio Trust.

Compliance with NEPA
How has the Letterman DEIS followed all NEPA related regulations, NEPA legal mandates, and NEPA related case law? Can a detailed analysis about this be included in the draft EIS as an appendix? 27-2

Incompliance with Key Documents
How is the proposed project consistent with the: 27-3
- July 1994 Final General Management Plan Amendment for the Presidio National Park
- -National Historic Landmark District
- 1916 Organic Act that established the national park system
- 1972 federal legislation that established the GGNRA

- 1996 Presidio Trust legislation? 27-3

There should be a detailed analysis completed that specifically addresses how the chosen project, currently LucasArts, will conform to the key documents listed. This is a significant omission from the current DEIS and should be included. The four "general objectives" listed on page six of the DEIS are clearly not derived from the above documents, and their fabrication to justify the private commercial development verges on the fraudulent. The DEIS states that "the general objectives of the GMPA are not precisely identified within the GMPA itself.." (page 6 DEIS), yet in the July 1994 Final General Management Plan Amendment for the Presidio National Park the Letterman site is designated as a "science and education center" that "will be devoted to issues of health, life, and earth sciences." This governing plan also states that Letterman "will be usedŠto support research and actions to improve human and environmental health. Life and earth science programs will be explored to better understand and manage the interdependence of health and environment." In addition, Letterman "will be dedicated to scientific research and education focusing on issues of human health, including preventive medicine, nutrition, collaborative eastern/western medicine, and health concerns related to the environment." The proposed Lucas project is wildly inconsistent with these very clearly stated objectives. This inconsistency should have been addressed in the DEIS. 27-4

The creation of the fictitious "general objectives of the GMPA" on page 6 of the DEIS were invented by the Presidio Trust with no legal mandate, no environmental review under NEPA, no public hearings or commments, and without changing the legally-binding and final GMPA. The sections of the July 1994 Final General Management Plan Amendment for the Presidio National Park that relate to the Letterman site should be included in the DEIS. 27-5

And does the Presidio Trust intend to follow any parts of the governing documents listed above, other than to focus on making money to ostensibly reach an operating budget whose calculation was done behind closed doors and has not been revealed to the public? The flagrant disregard for the public interest is starkly revealed by this and subsequent actions by the Presidio Trust discussed below. 27-6

Size of Project

The July 1994 Final General Management Plan Amendment for the Presidio National Park clearly limits park-wide new construction to a total of 665,000 square feet. The proposed project totals 1.49 million gross square feet of new construction, that is, over two times higher than the legally-binding limit, and also exceeds the 1.3 million maximum allowable squrae footage for the Letterman district. Why will the proposed project exceed these clearly stated limits of the governing GMPA? How is that 27-7

allowable? 27-7

Giveaways
Why does the DEIS not include information on the city, county and state tax breaks, rent breaks, tax credits, and other government giveaways involved in the proposed project? This should be included. Also the DEIS needs to list all public subsidies involved in the project, as well as the costs to the City and County of San Francisco to deliver public services to the development project. These glaring omissions are misleading to the public, who is not aware of the subsidies they will be giving to private interests. 27-8

Conflicts of Interest
Given that the Presidio Trust has been making decisions for the public, in lieu of a democratic procedure, it is only reasonable that they should disclose conflicts of interest with all the proposed alternatives, and in particular with Lucas, the final selection. What are the conflicts that exist, if they exist, for each Presidio Trust Board member? How have these been disclosed? This includes the professional, personal, and social connections between the Presidio Trust Board members and the proposed alternatives and Lucas? What lobbying occurred during the selection process? 27-9

Process
Why hasn't the Presidio Trust Board held its own public meetings on the DEIS?
Please identify the 110 public outreach sessions held in 1998, as stated by Jim Meadows. What were the subjects, the attendees, how many were affiliated with the proposed alternatives and not related to the projects themselves or to the Presidio Trust itself? 27-10

In closing, the DEIS should be reissued with an additional time period for public comment and several public hearings hearings held by the Presidio Trust itself. I oppose the proposed preferred alternative for all the reasons stated above. The Presidio Trust has violated the public trust and sold out the Presidio National Park to private developers.
The fundamental flaw in this action is clearly reflected in the convolutions of their DEIS that must continually mask, omit, and falsify information to attempt to justify what they have done.

Sincerely,

Valerie S. Iwata
531 2nd Avenue
San Francisco, CA 94118

Responses to Comments in Letter 27

27-1

For response to comments concerning opportunities for public involvement, refer to master response 1E, and with particularity to the Trust Board, master response 9B. See also Section 5.1 of the Final EIS.

27-2

Master responses 1B and 1D provide a detailed analysis of how the Trust is complying with NEPA. This will not be included as an appendix as requested.

27-3

Master responses 1D and 2A address the question of conformity with the GMPA. Master responses 1A and 1C address the Trust's conformity with applicable statutes.

27-4

Master response 2A addresses the Digital Arts Center's conformance with the GMPA. This is also addressed in Section 4.5.1.2 of the EIS. Development of the General Objectives of the GMPA is addressed in master response 3A.

27-5

A full discussion of the General Objective of the GMPA can be found in master responses 3A - 3C and in Section 1.1.7 of the Final EIS.

27-6

The Presidio Trust follows the specific requirements of the Presidio Trust Act and all other applicable laws, including NEPA and the National Historic Preservation Act. Section 104(a) of the Presidio Trust Act states that the Presidio Trust shall manage the leasing, maintenance, rehabilitation, repair and improvement of property within the Presidio under its administrative jurisdiction using the authorities provided in Section 104, exercised in accordance with the purposes of the 1972 Act that established the GGNRA, and in accordance with the general objectives of the GMPA. Please refer to Sections 1.1 and 1.2 of the Final EIS and master responses 5 and 10A and 10B for a complete response to the comment.

27-7

The proposed project would not exceed the square footage cap of 1.3 million. The preferred alternative calls for replacement construction of up to 900,000 square feet, with building demolition identified in the EIS to ensure the 1.3-million-square-foot cap at completion of construction. Master response 11 provides information on how the total square footage for this project was derived.

27-8

Please refer to response to comment 23-31.

27-9

Refer to master responses 9A and 9B.

27-10

Refer to the response to comment 23-60 and master response 1E. See also Section 5.1 of the Final EIS.

Letter 28

August 2, 1999

The Executive Director
Presidio Trust
Building 34
San Francisco, CA 94129

Attention: Mr James Meadows

Ref: Comments on the Letterman Complex as proposed by The Presidio Trust.

Dear Mr Meadows:

I am one of the very few who has served the Presidio of San Francisco to the best of my ability. Working for the Sixth U.S. Army and Presidio of San Francisco as their last Congressional Liaison, the Infrastructure Group under Charles Swanson, the Maintenance Technical Support, the Real Estate and Property Management, and now for the U.S. Park Police. I am as qualified as anyone of the experts to comment on the proposed Letterman Complex.

Further, I have attended most of the meetings called by the Presidio Alliance and other meetings called by neighboring community groups to discuss and evaluate the new developments and uses with the Letterman Complex as proposed by The Presidio Trust. Attending the Restoration Advisory Board meetings have given me further insight into certain factors that are linked with the Letterman Complex. 28-1

My subjective judgement is that the proposed changes do not meet certain federal mandated laws and regulations and especially the National Environmental Policy Act (NEPA). Further more the final proposed plan does not even remotely meet the basic requirements set by the final General Management Plan (GMP) and the final Environmental Impact Study (EIS). The Trust Bill and Congress mandates that the GMP and the EIS be used as guidelines.

I have stated the above facts at several public meetings. At most of these meetings staff from The Trust and members making the final list to lease of the Letterman facilities have been present.

Missing from the current Letterman process is the deliberative process which was followed by the GMP and the EIS. These two documents were documented after wide deliberative discussions involving the public and experts over a long period of time and covering the extended Bay Area. 28-2

The GMP and the EIS has no place for and does not factor a complex as large and having very little linked to the vision of the final GMP and the EIS as does the proposed complex that will substitute the present Letterman Complex. The Presidio Trust, for reasons best known to them have chosen to set abnormal standards that will come to haunt them in the long run. 28-3

It baffles me that no proper and detail analysis is shown linked to sewage, drainage, abatement and cleanup, water supply, traffic and transportation, emergency medical services and 911, natural habitat of species home to the Letterman complex, earthquakes, employment and diversity, archeological surveys and related issues, housing to name a few. 28-4

The Fire Department and the U.S. Park Police are entities that now serve the Presidio of San Francisco. The Letterman document does not address these two departments in a meaningful manner. 28-5

The Trust has chosen to follow a path that is detrimental to the deliberative process in the present circumstances. The Presidio of San Francisco and the Golden Gate National Recreation Area belongs to the people. As such each citizen if fully qualified to participate in the deliberative process. The Presidio Trust is mandated to follow certain laws and set certain standards to permit a open and sincere deliberative process. In the case of the proposed Letterman Complex the amended Letterman EIS and other related documents have chosen a hidden agenda and diverted the public from participating in an open deliberative process that is truthful. 28-6

It is not sufficient to have meetings and prepare an agenda that does not do justice to the deliberative process, especially when the input from the public is an essential component to the end result.

In conclusion , I state that the current Letterman Complex plan does not meet the basic requirements as clearly laid down in the final General Management Plan and the final Environmental Impact Study. The Presidio Trust has opted to choose a strategy that has fed the public with elements that favor a hidden agenda. Key elements such as sewage, earthquakes, traffic, archeological factors, natural habitats, were left out on purpose to the detrimental of this plan. 28-7

Francisco Da Costa
Muwekma Ohlone Tribe
Spokesman, Presidio Issues

Responses to Comments in Letter 28

28-1

Thank you for your letter. The Presidio Trust welcomes all comments on the Letterman Complex and other proposals in the Presidio and does not distinguish letters received on the basis of the commentor's qualifications or expertise. The Presidio Trust is pleased that the commentor is an active participant in meetings and discussions in connection with the Letterman Complex planning process. However, the Presidio Trust disagrees with the commentor that it has not fulfilled its existing authority and mandate under the NEPA, or the "requirements" established by the GMPA and the Presidio Trust Act. Please refer to master responses 1A, 1B, and 1D. Please also refer to master response 2A and Sections 1.1 and 1.2 of the Final EIS.

28-2

For response to comments concerning a preference for the GMPA public review process and adequacy of the Trust's public participation process for the Draft EIS, refer to master responses 1E and 1F. See also Section 5.1 of the Final EIS.

28-3

Alternative 1, which closely reflects the GMPA vision for the site, allowed for the demolition of the former hospital and replacement construction of up to 503,000 square feet. Alternatives 2 through 5 assume additional building demolition (primarily the LAIR facility) with a total replacement construction of up to 900,000 square feet. Because this is a departure from the GMPA and EIS of 1994, this EIS has been prepared to analyze the impacts of the new alternatives currently under consideration. Please refer to Sections 1.1 (Background) and 2.2 (Purpose and Need), the Consistency with Approved Plans and Policies discussions under each alternative in Section 4 (Environmental Consequences) and Appendix A (Revised Environmental Screening Form) for a further explanation about the relationship between the 1994 GMPA and EIS and this document. Also, refer to master responses 1D and 2A.

28-4

Each of the elements noted correspond to sections and analysis within the Final EIS and the record as a whole which openly disclose impacts, if any.

28-5

The Presidio Trust disagrees with the commentor's statement. The impacts on the U.S. Park Police and the Presidio Fire Department are adequately analyzed in Sections G.6 (Law Enforcement Services) and G.7 (Fire Protection Services) in Appendix A of the EIS. At the request of the Presidio Trust, both departments made staff support available and participated early in the NEPA process (see Section 5.5.3, Persons Consulted) and provided guidance, information and assistance in preparing the two sections to ensure that its views were adequately reflected in the EIS. Following its review of the Draft EIS, the two departments had no further comment.

28-6

Please refer to master response 1E and Section 5.1 of the Final EIS.

28-7

The commentor's conclusions are not supported by evidence in the record.

Letter 29

sgi

July 30, 1999

AUG 2 1999
RECEIVED

John Pelka
NEPA Coordinator
Attn: Letterman Complex
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

SGI
1600 Amphitheatre Pkwy.
Mountain View,
CA 94043-1389

Richard E. Belluzzo
Chairman
Chief Executive Officer

Tel 650.933.7000
Fax 650.932.0203

Dear Mr. Pelka::

SGI strongly supports the Letterman Digital Center as a tenant for the Presidio. I understand the objectives of the Presidio are to encourage uses that involve community service, the arts, education, research and innovation. I can think of few other organizations that meet these criteria as completely as the Lucas Companies.

SGI is the world leader in high performance computing technology dedicated to unleashing the power of human creativity. As such, we can attest to the fact that Industrial Light and Magic (ILM) and the other Lucas companies are pioneers in developing digital technology.

ILM has developed the prototypes for digital tools that today are standard in the industry: the motion control camera, EditDroid, SoundDroid, the digital film printer, computerized electronic nonlinear editing, a morphing computer graphics program for the fluid onscreen transformation of one object to another, computer graphics, computer generated characters and digital compositing, among others. 29-1

New techniques and tools continue to be developed such as animatic techniques (video storyboards); real-time facial animation and motion capture systems; Viewpaint 3D Paint System allowing artists to color and texture details to computer-generated effects; motion-controlled silent dollies for camera work; and new software that creates digital fabric, hair, skin and natural phenomena such as water and reflections for digital image development.

July 30, 1999
Page 2

The Lucas Companies emphasize research and development as a primary business goal. LucasArts Entertainment Company has developed new technology that has expanded the frontier in the computer games industry. The THX Group has raised the standard for sound in movie theaters and in-home sound systems with its innovative research and development program. By designing open-ended experiences that put the tools in the hands of the user, Lucas Learning has been able to address successfully the needs of students with diverse backgrounds and varied learning styles. 29-1

The Lucas Companies' success is directly related to their emphasis on research, education, the cinema arts, innovation and community service – the same ideals and goals as espoused by the Presidio Trust. The Lucas Companies are unique in that they have a business mission beyond providing goods and services to the marketplace. SGI looks forward to working with the Lucas Companies and Letterman Digital Arts at the Presidio.

Sincerely,

Richard E. Belluzzo
Chairman
Chief Executive Officer
SGI

REB:kjm

Response to Comment in Letter 29

29-1

Thank you for your letter. The organization's support of the Letterman Digital Center is noted for the record.

Letter 30

The Saul Zaentz Company

Payday
One Flew Over The Cuckoo's Nest
Three Warriors
The Lord Of The Rings
Amadeus
The Mosquito Coast
The Unbearable Lightness Of Being
At Play In The Fields Of The Lord
The English Patient

July 30, 1999

Via Fax: 415.561.5315

John Pelka
NEPA Coordinator
Attn: Letterman Complex
Presidio Trust
34 Graham St.
P.O. Box 29052
San Francisco, Calif. 94129- 0052

Der Mr. Pelka:

I am happy to write this letter in support of the Letterman Digital Arts' plans to develop the Letterman Digital Center at the Presidio. As an independent filmmaker in the Bay Area I can attest to the impact the Lucas companies have had on the advancement of the cinema arts.

As filmmakers we are all storytellers. The technological advances and pioneering innovations of companies like ILM and THX have put new tools into the hands of filmmakers which allow our imaginations to soar. With these new digital tools even schoolchildren can tell their stories and create their own destinies. 30-1

As an artistic achievement filmmaking is a uniquely collaborative effort. The Lucas companies have spawned a wealth of local talent. Many creative and innovative individuals that were hired and inspired by Lucas have gone on to establish their own companies benefitting all of us associated with the cinema arts.

Just as independence and a pioneering spirit have become synonymous with filmmaking in Northern California I look forward to the day when innovation and creativity will become synonymous with the Presidio.

Sincerely,

Saul Zaentz

Saul Zaentz

Response to Comment in Letter 30

30-1

Thank you for your letter. The organization's support of the Letterman Digital Center is noted for the record.

Letter 31

SUAL EFFECTS SOCIETY

PRESIDIO TRUST REC'D
2 A 9:57

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CLAYTON PINNEY
R.T. TAYLOR
CRAIG WEISS

August 2, 1999

Mr. John Pelka
NEPA Coordinator
Attn: Letterman Complex
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

Sent Via Fax: 415 561-5315
Hard Copy to Follow

Dear Mr. Pelka,

On behalf of the Visual Effects Society, I am writing this letter to illustrate support for the Letterman Digital Center. It is our understanding that the Presidio Trust's general objectives are to create a complex that serves the community through the arts, education, research, innovation and communication. As we approach the next millenium, digital imaging technology will be in the forefront of all future technology development for both the entertainment industry, as well as, for many traditional types of businesses. Lucas Digital has been and will be the leader in digital imaging technology, and as such, is poised to make the Letterman Complex a truly valuable asset to not only the San Francisco Bay Area, but to the world.

Lucas Digital, and specifically, Industrial Light + Magic have produced a tremendous amount of valuable information for the entire digital imaging industry. These efforts have been recognized by the Academy of Motion Pictures Arts and Sciences with not only fourteen awards for "Best Visual Effects", but equally important with fourteen additional awards for scientific and technical achievement. The combination of artistic excellence with technical research and development has clearly made Lucas Digital the recognized world leader in this arena. 31-1

The San Francisco Bay Area, specifically the Presidio, has the opportunity to combine the charm and cultural history of the Bay Area to a major aspect of the future of entertainment and business. Digital Imaging is a tool that will have as much influence on media and educational development as the introduction of color had to filmmaking. The Lucas companies offer the Presidio the great potential of building a digital imaging facility that will continue to lead the world in this arena. There is no other organization which has the experience, assets, recognition and wealth of talented artists that can bring to the Presidio and the San Francisco Bay Area what Lucas Digital offers.

5118 VALLEY VISTA BLVD. SHERMAN OAKS, CA 91403 TEL 818.789.7083 FAX 818.789.7085

VISUAL EFFECTS SOCIETY

Page Two
John Pelka
NEPA Coordinator

The Visual Effects Society strongly supports the Letterman Complex with the Lucas Companies leading this effort. The San Francisco Bay Area can only be enhanced by partnering with the Lucas Companies to build this world class facility to be housed at the Presidio. 31-1

If I can be of further assistance, please, telephone me directly.

Best regards,

Tom Atkin
Executive Director

TLA/ap

Response to Comment in Letter 31

31-1

Thank you for your letter. The organization's support of the Letterman Digital Center is noted for the record.

Letter 32

8-2-1999
Hand Deliver & Fax

Cow Hollow Neighbors in Action
Marina - Cow Hollow Neighbors and Merchants
2742 Baker Street
San Francisco, California 94123
415 - 776-3191

PRESIDIO TRUST REC'D

Presidio Trust
34 Graham
San Francisco, California

Re : Draft SEIR for Letterman Complex

Dear Trustees :

My comments concerning the this Seir address the lack of determination in addressing the cumulative effects of the project and mitigation solving the comprehensive problems. 32-1

1. Parking and Transportation
   A. The Seir did not address the existing projected figures of the Regional Mass Transportation Study for the Golden Gate Corridor of an increase of 249% Of vehicles by 2020. 32-1
   B. The SEIS did not address the proposed projects on the Lombard Corridor. 32-2
   C. The SEIS did not address that the projected numbers must be readjusted because Letterman had begun to shut portions of its facility in 1989 and the base levels of vehicles were not adequate. 32-3
   D. The SEIS did not address the Cal Trans nor the S.F. Department Of Parking and Traffic counts of 1998 for the Golden Gate Lombard Corridor as a base level for vehicular traffic. 32-4
   E. The SEIS did not address the Tour bus and visitor automobiles For The Letterman Complex nor their mitigation for these vehicles. 32-5
   F. The SEIS does not address the trucks and their cumulative impacts during construction of the proposed Letterman Complex . 32-6
   G. The SEIS does not address the ingress and egress of said trucks and their impacts upon The neighbors next door. There were no mitigation for this issue. 32-7
   H. The SEIS does not address the ingress and egress of said trucks and their potential Safety and hazardous impacts associated with the children at the YMCA Particularly with the proximity of the swimming pool and gym. 32-8
   H. The SEIS does not address the cumulative of all of the above issues and therefore the SEIS Is deficient. 32-9
2. Noise
   A. The SEIS does not address the factor that the Letterman Complex is in a gully with hills On two sides of it. 32-10
   B. The SEIS does not address the echo factor and its impacts upon the immediate neighbors. 32-11
   C. The SEIS has no mitigation for noise during construction nor after construction. 32-12

Page 2 of Cow Hollow Neighbors in Action response to the SEIS for Letterman Complex.

D. The SEIS does not address the noise element once the development is complete. 32-13

E. The SEIS does not address the tour bus, delivery trucks of suppliers once the development Is completed. What are the mitigation for ingress and egress? Short term & Long term? 32-14

F. The SEIS addresses the high noise factor existing within the neighborhood but does not Address the cumulative factor of the existing noises with the construction noises. 32-15

G. The cumulative effects of the above noise factors were never addressed. 32-16

3. Water Factor

A. The SEIS does not address the demolition factor and its potential impact upon the Neighborhood. 32-17

B. The SEIS does not address the factor that the water pipes have not been used for drinking for almost twenty years because of chemicals in the pipes. 32-18

C. The SEIS does not address the mitigation for the protection of the underground water Levels and the impacts to the City and County of San Francisco should the chemicals in the pipes that are either above or below the ground inadvertently get into the water System during demolition or construction. 32-19

D. The SEIS doe not address whether the City of San Francisco or the Presidio is supplying the water supply for the Letterman complex. 32-20

E. There was no conclusive mitigation for sewage . 32-21

Thank You,

Patricia Vaughey

Patricia Vaughey

Responses to Comments in Letter 32

32-1

See the response to comment 3-6.

32-2

Committed projects on Lombard Street are considered in a revised Cumulative Analysis contained in the Final EIS (see Table 9). The analysis indicates very minor impacts and resulting traffic volumes that are lower than those used in the Draft EIS's year 2010 traffic analysis.

32-3

The projected traffic volumes were those developed in the GMPA, and are based on the mix of land uses that are expected to be in the Presidio in the year 2010. For the turning movements that do not enter or exit the Presidio gates, the turning movement volume was assumed to increase at an annual rate of 1 percent from the existing counts made in January 1999. Therefore, 1999 volumes were used as a base, not 1989 volumes.

32-4

The San Francisco Department of Parking and Traffic is not aware of any comprehensive traffic counts in the Golden Gate/Lombard Corridor in 1998. The San Francisco Department of Parking and Traffic periodically conducts traffic counts at various locations throughout the city as the department determines traffic counts are warranted. Thus, the traffic counts conducted in 1999 for the purposes of this EIS provide the most recent and appropriate traffic counts.

32-5

The trips estimated for the Letterman Complex are comprised of both employee and visitor trips. Since it is planned primarily for office uses, tour buses would not be destined for the complex. If and when they do need to stop at the complex, they would enter through either the Lombard Street Gate or the proposed new intersection on Richardson Avenue. Based on city ordinances, tour buses are unable to enter via either Gorgas Avenue or Marina Boulevard gates.

32-6

The contribution of construction-related truck traffic to cumulative impacts would not be significant due to the short-term nature of construction activities. The impacts of construction traffic on the local and regional transportation system are discussed in Sections 4.1.7.7 through 4.6.7.7 (Construction Impacts) and would be mitigated through implementing mitigation measure TR-5, *Construction Traffic Management Plan*. It is highly unlikely that construction at the 23-acre site would overlap with the two major construction projects in the vicinity, Crissy Field restoration and the reconstruction of Doyle Drive, for the following reasons:

- Major site construction of Crissy Field is anticipated to be completed by mid- to late-year 2000, and therefore would not overlap with demolition or construction activities within the Letterman Complex, which would not start before that date.
- Planning and design effort for Doyle Drive will require a minimum of four years. Therefore, construction activities within the Letterman Complex would be completed prior to construction of Doyle Drive.

Planning for the renovation of the Exploratorium is currently underway, and construction is anticipated to begin in mid-2001 and be completed by the end of 2002. A portion of the Exploratorium construction activities, as currently planned, may overlap with those for Alternatives 3, 4, and 5. In response to the comment, mitigation measure TR-5, *Construction Traffic Management Plan* has been revised to include coordination of construction activities between the various nearby projects to minimize temporary transportation impacts.

32-7

See the response to comment 6-2.

32-8

The construction traffic management plan required under mitigation measure TR-5, *Construction Traffic Management Plan* would minimize impacts to visitor safety, including users of the YMCA.

32-9

The EIS does address impacts to which the commenter refers (see responses to comments 32-1 through 32-8). The traffic volumes analyzed are appropriate for both existing and cumulative (year 2010) conditions. Any temporary construction-related traffic would be subject to mitigation measure TR-5, *Construction Traffic Management Plan*.

32-10

The sloping terrain of the Letterman Complex and the upward grades to the southwest and west could reflect noise generated at the project site outward (to the northeast and east). Reflected noise or noise caused by echoes is not considered in the analysis because the impacts of reflected noise would be substantially less intense than the impacts experienced by the noise-sensitive sensitive receptors located along the shortest, most direct path of noise travel. Since the travel of noise follows primarily linear paths, terrain-reflected noise would tend to travel upward and outward over the Marina District. As reflected noise travels back toward the neighborhoods, it would tend to be masked by foreground noise. Reflections or echoes could be occasionally noticed by neighbors, but these noises would be indirect and attenuated with the additional distance traveled. The slopes that would provide reflection around the Letterman Complex are not steep walls, and they are made of acoustically "soft" surfaces, meaning they are vegetated with trees and grasses and are not densely built up. These factors would serve to diminish the intensity of reflected noise to a level that does not require further analysis. The noise analysis instead focuses on the effects of noise traveling along the shortest, most direct path to the nearby receptors, including the residences located along Lyon Street, which face the site. Direct impacts at these nearest neighbors are characterized in Sections 4.1.10 through 4.5.10 of the EIS.

32-11

The effect of echoes on immediate neighbors is discussed in response to comment 32-10.

32-12

As discussed in Section 4 of the EIS, noise during demolition and construction would be reduced by mitigation measure NO-1, *Reduction of Construction Noise*. Traffic noise and noise from stationary sources expected with Alternatives 1 through 5 after construction would not cause significant impacts. No significant noise impacts would occur with Alternative 6. Therefore, no further mitigation would be required.

32-13

The comment is unclear. If the commentor is referring to noise impacts of the development following construction, the operational noise impacts for each alternative are analyzed according to the thresholds in Section 4.1.10 of the EIS. The effects of noise generated after completing construction are then discussed for each alternative in Sections 4.1.10.2 through 4.5.10.2 (Long-Term Traffic Noise Increases) and 4.1.10.3 through 4.5.10.3 (Long-Term Stationary Source Noise Impacts). These two impact topics consider the sources of noise that would operate following construction of the alternatives.

32-14

The traffic noise impacts analyzed in the Draft EIS account for all vehicle trips to and from the site (including ingress and egress). The noise contributions of heavy-duty trucks, buses, medium-duty trucks, and automobiles is considered and aggregated in the impact evaluation. The noise analysis assumes that the composition of new traffic caused by the development alternatives mimics the composition of the traffic present in the existing conditions. This means that the occurrence of all types of vehicles is assumed to increase proportionally with the expected increase of overall vehicle trips. This assumption is conservative for the proposed development alternatives because the new traffic would most likely include a lower percentage of heavy-duty trucks and buses and a higher percentage of automobiles than currently exist. Implementation of mitigation measures for transportation, including mitigation measures TR-1, *Lyon Street/Richardson Avenue/Gorgas Avenue Intersection Improvements*, and TR-5, *Construction Traffic Management Plan*, would route ingress and egress traffic during operation and construction phases, respectively, away from noise-sensitive receptors in the nearby neighborhood. Because the noise analysis considers the influence and the routing of the vehicles, and no significant impacts were identified, no noise mitigation measures would be required. See also the response to comment 32-13.

32-15

Construction noise impacts are analyzed according to the thresholds in Section 4.1.10 of the EIS. These thresholds are applied to the instantaneous equivalent noise levels (L_{eq}) that could be caused by the construction activities. The threshold of 80 dBA L_{eq} is used to determine significance of any daytime construction noise regardless of noise levels existing without the construction activity, and the threshold of a 5-dBA increase is used to determine the significance of nighttime noise over conditions existing without the construction activity. Because mitigation measure NO-1, *Reduction of Construction Noise*, would address these impacts, the effect of adding construction noise to the existing noise environment is addressed.

32-16

The effects of noise reflections are discussed in response to comment 32-10. Because noise levels are measured on a logarithmic scale, low-energy reflected noise would not cause substantial contributions to the noise levels analyzed in the EIS (which includes the effects of heavy-duty trucks, buses, as well as other operation and construction noise). In response to the comment, new text has been added to Sections 4.1.11.8 through 4.6.11.8 (Noise) in the Final EIS to address cumulative impacts of the proposed development in combination with other reasonably foreseeable future projects. As discussed, cumulative impacts of demolition/construction noise would not be significant, and cumulative impacts of long-term traffic and stationary source noise would not be significant.

32-17

The Presidio Trust is unaware of any neighborhood impact on water that would occur during demolition. The short-term noise impact on adjacent neighborhoods due to demolition is discussed in Sections 4.2.10.1 through 4.5.10.1 (Short-Term Demolition/Construction Noise Impacts) of the Final EIS.

32-18

The water pipes do not pose a risk to human health, safety, and the environment. The Army previously evaluated the hazard of mercury vapor in the LAIR's laboratory sinks (U.S. Army 1993b as referenced in Section 6 in the Final EIS). The evaluation focused on 19 laboratories and rooms where there was potential for mercury contamination to occur in sinks and drains. The assessment found that 5 of the 19 rooms contained recoverable mercury from <0.1 grams to 19.26 grams. Total mercury found and removed during the sampling event was 20.58773 grams. The Presidio Trust has contracted FOSS Environmental and Infrastructure to collect, inventory and dispose of hazardous waste/materials remaining in the Letterman Complex. Even though the data suggest that traps do not pose a chemical threat, the Trust has directed FOSS to remove all traps located in laboratories. The traps will be staged, profiled and disposed of in a proper manner to eliminate the potential of a chemical release.

32-19

See response to comment 32-18. In addition, mitigation measure HH-3, *Contingency Plan* would ensure that corrective measures to protect groundwater and soil would be implemented immediately if contamination is discovered or observed.

32-20

The text in Section 3.5 has been revised to indicate that the Presidio Trust would supply water to Presidio users, including those located within the Letterman Complex. Refer to master response 13.

32-21

Refer to master response 14.

Letter 33

FORT POINT AND PRESIDIO HISTORICAL ASSOCIATION

TRUST REC'D

30 July 1999

NEPA Compliance Coordinator
Presidio Trust
34 Grahm Street
P.O. Box 29052
San Francisco, California 94129

Attention: Letterman Complex
Re: Draft EIS Comments

Presidio TRUST REC'D

Dear Sir or Madam:

We have reviewed the Draft EIS and have the following concerns. We have focused on our own areas of expertise and interest, which are conservation of existing archaeological and historic sites and appropriateness of the new design to the historic district of the Presidio, and its history and archaeology.

Appropriateness of the Design:

33-1

Permitted Area of Construction: The GMPA mentions Letterman as an 800,000 s.f. complex, which was presumably based on the 1989 uses in the GMPA database. On page iii, the summary identifies 807,000 s.f. in the combined LAMC and LAIR. The source of the additional 93,000-to-100,000 s.f. which has been permitted under the proposed 900,000 s.f. development must be documented. The added space on this site, beyond what is there now, requires justification or should be removed from the program.

Site Planning: The location of this massive corporate project just within the main entrance to a national park seems visually to contradict the mission of the Presidio. Since the proposed tenant is *not* consistent with the GNP, the design alternatives should include alternative locations more consistent with the goals of Lucas *and* the National Park. Ideal site criteria for Lucas might include: a less public location, more seclusion, better access to Marin County, etc. Failing that, a location on the 23 acres that minimizes the building's impact is most desirable. Creating of an "enclave" should be resisted by the Trust. The Lucas plan does little to provide public access to the site. Although the "Great Lawn" is accessible to the public, access is obscured by the bulk of the three large structures on the south edge of the site. The "Great Lawn" is likely to function as a private lawn. 33-2

Site Circulation: The project is too impermeable to pedestrian and bicycle traffic. It creates a long barrier to pedestrian movement from east to west for the entire length of O'Reilly Avenue, forcing a long detour to the south or north to get around it. If the complex's main interior north-south circulation between wings could occur *above* the ground floor, it might be possible to create passages for pedestrian or bicycle traffic under or through this barrier without loss of privacy or security to the building users. Or, if the site slope is sufficient, passages through "Building 1" could be provided as the slope permits. 33-3

Open Space: The giant lawn to the east, which is doubtless pleasing to the adjacent residential neighborhood, forces the new buildings too close to the historic housing on 33-4

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O'Reilly Avenue. In this respect, the proposal does not meet the planning guidelines prepared by SMWM which calls for retaining the historic "O'Reilly Commons", an existing green space. Even if the green space were not historic, the historic houses across from it require the space as a buffer along the west side of the giant "Building One." 33-4

Bulk: Some, but not all of the problems of this design are due to its density. The original building that it replaces was also too dense to be appropriate on this site. Reducing the project's apparent bulk by whatever measures are available is essential. That might include one or all of the following strategies:

- Restrict the volume of the new construction to just the amount demolished, per the GMPA.
- Locate as much of the volume as will fit comfortably into open areas in the balance of the Letterman site, on the footprints of missing buildings from the older hospital. 33-5
- Move some of the square footage elsewhere either within the Presidio or not.
- Require the developer to put more underground. Putting more of the structure under ground would make the scale of this project more in keeping with the historic district. Those functions which do not require windows, or would benefit from a constant temperature, or a very secure environment might work well below grade. If the bulk of the building can be reduced by one story, it would also help to make it more compatible with the historic district.

Massing: Ways could be found to manipulate the massing to reduce the apparent size of the complex, and allow it be more a part of the Presidio, and less of an enclave unto itself. The existing design is difficult to critique in detail owing to lack of information. A site section would be helpful. However, some conceptual suggestions, based on the site plan on page 32, follow:

- The tallest blocks of the proposed design (the highest and most dominant elements) are oriented east and west, and will cast shadows over the courtyards inside the complex, as shown in plan. If the structures were generally lower, it would lose less sun, and the initial impact of the structure could be lessened from the Presidio gate. The problem of west sun should not be so severe in this location, due to the prevailing fog patterns. 33-6
- The building's uphill portions should be shorter than the down hill portions, again reducing the mass from the Presidio Gate. The Gorgas facade could afford to be taller, due to the industrial scale which prevails in that area, at the lowest part of the site.
- The use of closed courtyards, not open to the public on any side, makes it nearly impossible for the mass of the buildings to read as narrow elements (per the Draft Planning Guidelines). Instead they read as a series of giant boxes. Opening the courtyards to the public, would help relieve the mass, and would be in the spirit of access which characterizes a National Park.
- Location of Buildings Two and Three closer to the bottom of the site (on Gorgas) would create a "Great Lawn" which serves the Presidio itself, rather than only Lucas and the Marina. Shared roof top recreation space for Lucas staff would permit everyone to enjoy the view.

Existing Recreational Facilities and Community Services:

Letterman now includes some tennis courts. Consideration should be given to preserving them, for public use, as outlined in the GMPA, and the facilities which appear to replace them (labeled F on page 32) could be relocated elsewhere. Or the tennis courts could be relocated elsewhere, at the expense of the developer. 33-7

The GMPA mentions the auditorium at Letterman, the loss of which should be mitigated by providing a similar public accommodation in the new project. That theater is relatively separate from the complexes to be demolished and is close to the housing on O'Reilly. If the new complex were pulled back from O'Reilly Avenue (as would be appropriate to the Draft Planning Guidelines), the existing theater could be retained. 33-8

Cultural Landscape:

Development on this site has the potential to transform the first impression of the Presidio, for good or ill. The potentially character defining role of the landscaping, (and the new buildings), should be carefully considered in the context of the whole. Landmark quality existing historic landscaping features, such as O'Reilly Green, need to be retained. The new landscape needs to be compatible with the adjacent landscaped areas, and it should not set off this 23 acre portion of the Letterman site from the rest of the Letterman site, or from the rest of the Presidio, regardless of its tenant's functional needs. The project needs to reflect the cultural landscape, and restore those historic elements which can identified. At the same time, new landscaping needs to help screen the mass of this enormous project. 33-9

History:

We find the EIS deficient in its treatment of the history of the site:

1. It ought to mention, in the Summary and in Section 3.1, the fact that the Presidio is a National Historic District. This information may be assumed, and it is implicit in much of the comparisons of alternatives, but it appears to be mentioned only in Appendix B, SMWM's Draft Planning Guidelines. The treatment of history in the body of the report is confined to brief references in the Summary (Page iii), and four sentences on page 51. One infers that the site is considered historic, and one learns that it *must* comply with the National Historic Preservation Act, but not *why*. It is perhaps elliptical because it is a "supplement" to the GMPA, but still, that information should be available to a reader who has not seen the original document. 33-10

2. The future tenants should be brought into the team which is responsible for the interpretation of history of the site. That role should be identified in the EIS. Their presence in the Presidio demands that they display some appreciation for the privilege of being there, and that they contribute to the public understanding of the history of this important site. 33-11

3. The significance of the history of this site deserves effective historical interpretation, somewhere on the site, and available to the public. The Draft Planning Guidelines mention Building 558 as one possible site for some kind of museum or visitor center. It has been there since 1920 and served as a Post exchange, restaurant and terminus for the electric streetcar line that served the Presidio until 1945. Some appropriate public use should be made of this in the new plan, and its proximity to the main public axis makes an interpretive use logical. If this building is within the site, the developer should be responsible for developing it, in conjunction with NPS and Trush staff. 33-12

Archaeology:

1. The GMPA specifically mentions the danger of new construction to archaeological remains at the site. It recommends avoiding them "through design." Before that can happen, and *before the design is completed*, such remains should be located and mitigation measures be taken, and the design should take them into account. It is important to note also that a programmatic agreement for the treatment of cultural 33-13

resources, both prehistoric and historic, has been signed by all parties at the Presidio. The agreement clearly spells out the process to be carried out, and should be applied to the Letterman project because of the potentially very complex archaeology. The agreement calls for pre-construction archival research and for the sub-surface of the area to archaeologically tested for resources well before construction begins to prevent construction delays. We *recommend that this testing be carried out before the design is final* so it may inform the location of proposed new structures. At least six months should be allowed prior to construction to carry out archival research, subsurface testing, and the preparation of a written report. The Crissy field project is an excellent example of how construction can be delayed because neither pre-design nor pre-construction archival and physical testing for resources were made part of the planning process. 33-13

Specific problems with the section dealing with archaeology follow:

2. "Section 2.6.7 Archaeology" is either too abbreviated, or is partly missing. It is out of balance. It treats monitoring exhaustively, but barely mentions the earlier stages of sound archaeological procedures. The EIS should require pre-design testing instead of pre-construction testing. Testing language should be more definite (shall be or will be rather than "would be"). There should be a fuller treatment of standard archeological procedure and protocol involving research and testing, prior to the monitoring phase. The standard procedures listed should, at a minimum, include the following: 33-14
   a) Perform an archival study to assemble what data there is on the site's history, both historic and pre-historic.
   b) Perform a "phase 1 archaeological study" to observe any surface archaeological evidence.
   c) Perform a "phase 2 archaeological study" to systematically study the subsurface (test augering or backhoe testing, followed by hand excavation if indicated).
   d) Perform advance mitigation, especially of pre-historic remains which will require work with native American groups. This will probably be indicated, whether or not portions of the site have been previously disturbed,.

3. During construction, appropriate monitoring procedures should be followed; either full time monitoring or spot checks, depending on the results of the earlier studies. 33-15

4. Paragraph 5 appears to be out of sequence, because it applies earlier in the process. This paragraph should also contain the policy that sensitive areas that *have* been previously disturbed could well deserve archaeological excavation. 33-16

5. The GMPA mentions (page 101) a "an "archeological resources management plan" as being "underway to guide future management," presumably as of 1995, the date of the Final GMPA. The status of that plan should be determined, (we have never seen it) and if it exists, reference should be made to its findings as they apply to this site. 33-17

Any conceptual plan by the Lucas group or other organization should be submitted to the NPS archaeologist, Leo Barker, for review as soon as it is developed. Time is very important because of the complexity of archaeology in the Letterman area, and the length of time that will be needed to carry out pre-construction research and subsurface testing. 33-18

Long Range Planning and Economic Justification:

The EIS document (and all future EIS's) should include updated information on the economic justification for the project in the context of the Trust's overall master plan and over all financial obligations, showing progress to date towards their goal of financial 33-19

independence. Evaluation of any proposal is made much more difficult without an up-to-date understanding of its planning and economic context. A working economic model should be available to the Public (we assume it is already in use by the Trust). 33-19

We look forward to hearing more about this important project as it progresses.

Sincerely,

Lucia Bogatay, AIA & Lawrence W. Desmond, Phd.
Co-Chairs of the Architecture & Archaeology Committee
Fort Point and Presidio Historical Association

cc: Redmond Kernan
Brian O'Neill
Courtney Damkroger, National Trust for Historic Preservation
Donald Andreini, Heritage
Stead Craigo, State Office of Historic Preservation

Responses to Comments in Letter 33

33-1

The GMPA and EIS identified additional buildings within the Letterman Complex that could be demolished and an equivalent amount of square footage constructed within the 60-acre area. Since the GMPA's adoption in 1994, several of these smaller-scaled buildings have been demolished. Additional buildings to be demolished are identified in Appendix C of the EIS. Please see master response 11.

33-2

Alternative locations for the project are adequately discussed in Section 2.2.1, Alternative Sites within the EIS. The 23-acre site was the most well-suited location for the proposed project. See Section 1.2.2 of the Final EIS. The Presidio Trust disagrees with the commentor's assertion that the proposed tenant of Alternative 5 is not consistent with the GMPA. As discussed in Section 4.5.1, Consistency with Approved Plans and Policies, with the exception of Alternative 1, the preferred alternative is most consistent with the GMPA for reasons given in the text (see master response 2A). The 7-acre Great Lawn or public park would further the GMPA's general objective to increase open space and the GMPA's specific goal to provide for safe and enjoyable recreational use of the Presidio. Implementation of the Planning and Design Guidelines through the site planning and design development phases would ensure that the locations of the proposed buildings would minimize impacts on recreational use of the public park and public access. These Planning and Design Guidelines include parameters for height and bulk of building masses, as well as for public access. Please refer to master responses 23 and 25 with regard to circulation and public access. Please refer to master responses 7A and 7B concerning Planning and Design Guidelines and design review.

33-3

The preferred alternative would be modified through the planning and design review process to more fully comply with the Planning Guidelines. Conformance with the Planning Guidelines' principles for public access, land use as well as access, circulation and parking would be addressed at that time. Please refer to master responses 7A, 7B, and 25. The Great Lawn would be accessible from the south through two passages, between the buildings, as well as at the north edge of the site from the east at Chestnut Street.

33-4

Please refer to master response 23 with regard to the preferred alternative's effects on the historic setting and O'Reilly Avenue. The Final Planning Guidelines include goals and design objectives for preserving the O'Reilly Commons. Additional text has been added to the Planning Guidelines to better define the desired width of the O'Reilly Commons, and additional text has been added to the Final EIS to reflect those inconsistencies with the Planning Guidelines that constitute an adverse effect. In the preferred alternative, the Great Lawn would serve as an additional open space to that of the O'Reilly Commons.

33-5

The comment is noted. Implementation of measures affecting building form, as described within the Planning Guidelines, would provide a comparable lessening of the effect on the historic district while reducing the project's apparent bulk. Alternative 1 within the EIS considers replacement construction of up to 503,000 square feet throughout the 60-acre Letterman Complex. Please refer to master response 11 with regard to the

derivation of the proposed building area and square footage. Please refer to Section 2.2, Alternatives Considered but Rejected, for discussion on locating the replacement construction elsewhere within the Presidio (also, refer to master response 10A). The suggestion to consider locating more of the new construction underground could be considered in the design development phase as a means to reduce any adverse effects on adjacent historic structures and streetscapes caused through height and massing of the new construction.

33-6

Site sections of the preferred alternative have not been provided in the Final EIS, but would be included in future planning and design reviews, with opportunities for public input at the conceptual design stage. Responses to the bulleted remarks follow:

First Bullet – The tallest blocks of the buildings, which are bar-shaped, would be oriented east/west. The benefit of this orientation is that along O'Reilly Avenue, the narrowest section of the tall building block would face the commons and therefore the potential for shadow-casting would be minimized. The four-story gable ends of the buildings would alternate with three-story connection pieces, creating some modulation in the building elevation facing O'Reilly Avenue.

Second Bullet – New buildings which directly face Gorgas Avenue would be lower in height than in other areas of the site, to be compatible with the one- and two-story buildings along Gorgas Avenue. Elsewhere in the 23-acre parcel, a 60-foot height limit in conjunction with buffers and setbacks would prevent the new construction from towering above its adjacent neighbors. An open space "foreground" along Letterman Drive would serve as a visual buffer for adjacent new construction at 60 feet. Please refer to the Building Form section of the Planning Guidelines for additional information and graphic diagrams.

Third Bullet – Design of the buildings would be developed so that they do not read as "giant boxes." The concept for this design is a series of parallel bars linked by connecting buildings. This idea would be further developed to avoid monolithic massing. Public access to the courtyards would be explored in subsequent site planning and design of the preferred alternative (see mitigation measure CR-1, *Planning and Design Guidelines*). Creating courtyard buildings, however, is consistent with the Planning Guidelines recommendation for "buildings clustered around courtyards and intimate outdoor spaces" (Appendix B, 3.5.2D within the Final EIS).

Fourth Bullet – The commentor's suggestion of locating Buildings 2 and 3 on Gorgas Avenue would be incompatible with the adjacent one- and two-story industrial buildings which presently define the historic character of Gorgas Avenue. However, it is duly noted that the Great Lawn should serve all Presidio visitors and tenants. Efforts would be made during subsequent stages of the design to improve public access and increase visual access into this large open space.

33-7

The tennis court, structure 1147, would be relocated elsewhere within the Letterman Complex or Presidio. The effects of this action are analyzed in Section W, Recreation in Appendix A.

33-8

The GMPA concept of retaining the LAMC auditorium was coupled with the idea of retaining LAIR. The preferred alternative is based on the idea that both LAMC and LAIR will be removed and an integrated, carefully designed complex would be developed for the 23-acre site which is more compatible with the historic Letterman setting than what currently exists. Under this scenario, the Trust considers that the existing auditorium is incompatible with the historic setting of the Letterman Complex and attempting to integrate it into a new design for the site could prove to be quite difficult. Also, it is very close to the historic structures on O'Reilly Avenue, making the realization of an O'Reilly Common very difficult. The auditorium has never served as a public amenity, so its loss to the public would be negligible. Please see master response 25 for a discussion of visitor experience and public access.

33-9

Comment noted. Implementation of the Planning Guidelines and later Design Guidelines would ensure that the new development would be in keeping with the character of the historic district, which would include elements of the cultural landscape. Please refer to master responses 17, 23 and 24 with regard to discussion of the cultural landscape and visual screening.

33-10

In response to the comment, text has been added at Sections 1.4 and 1.1 of the Final EIS discussing the Presidio's status as a National Historic Landmark district and the implementation of the NHPA mandate. The commentor is referred to Section 3.1, The Presidio, and Section 3.10.1, National Historic Landmark District that identify the Presidio as a National Historic Landmark district. It should be noted that the history of the Presidio and the site are important topics in the EIS. The Index identifies such key words as "historic hospital complex," "national historic landmark," "National Historic Preservation" and "cultural resources" as appearing more than 50 times throughout the text.

33-11

The Trust concurs with this comment. As discussed in Section V, Interpretation and Education within Appendix A of the EIS, future tenants would be required to include programs that acquaint visitors with history, culture and the arts, cross-cultural and international understanding, community renewal, and/or environmental stewardship and sustainability. These programs would benefit the Presidio, the participants, and the organizations and communities they represent. These enhancements for achieving Presidio goals would have beneficial impacts on visitor interpretation and education. Furthermore, text has been added to Sections 2.3.3 through 2.8.3 (Activities and Programs) to address this comment. Refer to master response 25.

33-12

Building 558 has been rehabilitated by the Presidio Trust to house the residential leasing office as well as an un-staffed visitor information station. In addition, a wayfinding/information kiosk would be constructed near the building to further guide visitors through the Letterman Complex.

33-13

The commentors reference the 1994 Programmatic Agreement for the Presidio and that document's provisions for archeological analysis. A final Programmatic Agreement for the Deconstruction, New Construction, and

the Execution of Associated Leases at the Letterman Complex has been developed by the Trust and is attached to the Final EIS in Appendix F. This new Programmatic Agreement includes an Archeological Monitoring Assessment and Monitoring Program (AMA and Monitoring Program) developed for Letterman, which is found in Appendix A of the Letterman Programmatic Agreement. The provisions of the Letterman Programmatic Agreement supercede the previous 1994 Programmatic Agreement.

Under the AMA and Monitoring Program all planned undertakings will be reviewed by a qualified archeologist prior to final design. The initial AMA for the 60-acre site has been conducted; four archeologically sensitive zones were identified. The Trust agrees that there is a need to factor in archeological issues in the preliminary phases of design.

33-14

The referenced Section 2.6.7 has been rewritten for the Final EIS, and moved to Section 4, Archeological Properties, as mitigation measure AR-1, *Archeological Management Assessment and Monitoring Program.* In addition, as noted in the response to comment 33-13 above, Appendix F of the Final EIS, contains the Programmatic Agreement which contains the AMA and Monitoring Program for the Letterman Complex. The AMA would examine the existing archeological inventory and predicted sensitivity zones in the Area of Potential Effect for the undertaking. Additional studies separate from monitoring would be recommended in the AMA. The AMA would include: a) archival study to assemble historic and pre-historic data; b) ground probing for surface and sub-surface archeological evidence; c) test augering or excavations as needed; and d) compliance with all provisions of the Native American Graves Protection and Repatriation Act (NAGPRA) and the Archeological Resources Protection Act (ARPA).

33-15

Appropriate monitoring procedures would be followed as per the Programmatic Agreement in Appendix F of the Final EIS.

33-16

To the extent that areas have been previously disturbed, the Presidio Trust would consult with the SHPO on appropriate methodologies. Archeological excavation rather than preservation *in situ* may not be appropriate.

33-17

The archeological resources management plan mentioned on page 101 of the GMPA was never completed by the NPS. Thus, there were never any findings related to this site. Portions of it, most notably the CAD maps of sites, have been incorporated in the archeological research completed for the development and execution of the Programmatic Agreement in Appendix F of the Final EIS.

33-18

The Trust agrees that there is a need to factor in archeological issues in the preliminary phases. To this end, archeological concerns were discussed with the project proponents at the earliest planning stages for the Letterman project. Information provided to the proponents included an archeological sensitivity map prepared

by Leo Barker. The design of the preferred alternative allows the project to avoid known archeologically sensitive areas in the vicinity of PAS-2 and PAF-30.

The Archeological Management Assessment Program described in Appendix A to the Programmatic Agreement states that all planned undertakings would be reviewed by a qualified archeologist prior to final design. The archeologist would prepare an AMA report or documentation to examine existing inventory and predicted sensitivity zones. Comments from the archeologist would include recommendations for additional actions to clarify or ensure resource identification and protection, and proposed methods of monitoring. Additional studies separate from monitoring may be recommended in the AMA, including, where appropriate, ground probing, historic research, or test excavations. Such studies might ultimately result in redesign of the project if necessary to protect archeological resources.

33-19

Please refer to the FMP in Appendix E of the Final EIS, and to master response 10A. Refer also to Section 1.2 of the Final EIS and master response 4A.

Letter 34

business working
for a better future

PRESIDIO TRUST REC'D

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Autodesk, Inc.

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General Counsel
Albert Bianchi, Partner
Bianchi, Engel,
Keegin and Talkington

330 Ignacio Blvd
Suite 102
Novato, CA 94949

415.382.7575
Fax: 415.382.7578
E mail: northbay@aol.com
www.northbaycouncil.org

July 30, 1999

NEPA Coordinator
Attn: Letterman Complex
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

To Whom It May Concern:

I am writing on behalf of the North Bay Council, a coalition of businesses in Marin and Sonoma Counties, in support of the Presidio Trust's selection of the Letterman Digital Center. I have worked with the Lucas companies for several years, and I know first hand that they share the Presidio's commitment to education, research, community service and innovation.

The Presidio should be a place where the quality of the ideas produced by those who live and work there help shape the future. With the Letterman Digital Center, the Presidio will be known as much for what goes on within its boundaries as for the beauty of its location.

34-1

The Letterman Digital Center is the type of investment the Bay Area needs to take advantage of the new digital age. By bringing together skilled technicians, artists and engineers, the Letterman Digital Center will become a hub of the revolution in digital imaging. It will attract other companies and organizations, who want to be at the heart of the digital revolution.

The Lucas companies have a long history as pioneers in the digital industry. They have developed products and services that impact our lives daily. The technology developed by the Lucas companies has not only changed the way we watch and hear movies but how we see and listen to our world.

The Letterman Digital Center will help give the Presidio an identity as a place where new, and innovative ideas are created. The Presidio Trust has made an excellent choice in the Letterman Digital Center. 34-1

Sincerely,

Mary Jaeger
Executive Director

Response to Comment in Letter 34

34-1

Thank you for your letter. The organization's support of the Letterman Digital Center is noted for the record.

Letter 35

ROCKY MOUNTAIN INSTITUTE

PRESIDIO TRUST REC'D

NEPA Compliance Coordinator
The Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco CA 94129-0052

21 July 1999

Dear NEPA Compliance Coordinator of The Presidio Trust,

Letter for the Record, Submitted as part of the
Draft Environmental Impact Statement and Planning Guidelines
For New Development and Uses Within the Letterman Complex

Environmental Opportunities for Alternative 5: Digital Arts Center

Since its inception in 1991, Green Development Services (GDS) has worked with organizations worldwide to integrate energy-efficient and environmentally responsive design into a variety of building projects. Green Development consulting projects include new towns, building renovations, a bug zoo, Wal-Mart's Eco-mart, the Sydney 2000 Olympic Village, Monsanto's Corporate Headquarters, Greening the White House, and the Pentagon Renovation. In October 1995 and July 1996, GDS participated in a charrette on the development of green building strategies to support the conversion of the Presidio from an Army base into a profitable National Park. GDS staff also provided research and editorial assistance on the charrette report.

We believe that developing at the Presidio is a unique environmental opportunity. Just as the adjoining Thoreau Center for Sustainability has set a standard for environmentally responsive renovation, the redevelopment of the Letterman site into a Digital Arts Center, the Letterman Digital Center will set the precedent for new construction on the Presidio. And, we believe that due to the visibility of this project, the Letterman Digital Center will have national significance for the green building movement.

Environmentally responsive development significantly improves the comfort, aesthetics, resource efficiency, and value of properties while reducing pollution and saving money. More than 30% of America's total energy usage, 60% of its electricity and its financial resources, and 26% of the contents of its landfills are linked to buildings. Moreover, 80% of the average American's time is spent inside. Thus, enhancing the energy efficiency and livability of buildings through better design is a powerful way to restore the environment and improve quality of life while saving money. 35-1

We would now like to comment on several areas of Sustainable design that Alternative 5 the Letterman Digital Center addresses:

- Environmentally responsible construction;
- Integration of sustainable design principles;
- Energy management; and
- Sustainable building operation practices.
- Stormwater
- Water supply
- Landscape and habitat

Each of these are discussed below.

The Letterman Digital Center buildings are designed for longevity, an elemental component of sustainability. The concrete structures and tile roofs should last as long as older Presidio buildings have.

Building structure, arrangement and interior systems provide sufficient flexibility to allow reconfiguration in a variety of ways as changing uses may demand. Lighting and ventilation systems are simple, flexible and reliable. The Letterman Digital Center team is familiar with and is considering life cycle and environmental costing implications in every design decision. We project an effective life of 100 years.

The Letterman Digital Center Team includes world class environmental technical experts on integrating issues such as site design, building design, energy and water efficiency, resource-efficient construction, lighting design, and building ecology. Environmental and energy efficiency considerations influence siting, shell design, glazing selection, daylighting, lighting systems, HVAC, and the choice of office equipment. The range of available options, refined to address the Digital Center's requirements, will yield an attractive, functional, energy-efficient, cost-effective, environmentally responsible and durable design.

ENVIRONMENTALLY RESPONSIBLE CONSTRUCTION

On the construction side of the project, our team will implement an environmental construction management plan to ensure environmentally responsible practices during construction. This plan will focus on and contain requirements for minimizing noise, traffic, dirt and other impacts to the surrounding neighborhood, minimizing habitat and erosion impact on the site during construction, decreasing land-filled materials, tracking green material and indoor air quality specifications, and protecting workers from exposure to harmful materials.

INTEGRATION OF SUSTAINABLE DESIGN PRINCIPLES

The best way to ensure the integration of sustainable design principles is to use the US Green Building Council's LEED rating system as a sustainable design guideline for the project. LEED is a comprehensive tool that addresses all environmental topics most relevant to new construction, and covers energy issues extensively. Rocky Mountain Institute's Green Development Services was involved in founding the US Green Building Council, we serve on the Board of Directors, and helped create LEED. Members of the team have already used LEED in several projects and are intimate with its application. 35-1

The Letterman Digital Center Team considers LEED a "design to" standard, and intends to use it as a frame of reference throughout the design process. Given the nature of the buildings and the site, the team is hopeful that it can achieve a Platinum level. We are confident we can achieve a Gold rating level, which requires an exceptionally high performance level.

SUSTAINABLE BUILDING OPERATION PRACTICES.

Sustainable building operation practices include monitoring various aspects of building operations, operating recycling systems, maintaining operational energy and water efficiency, maintaining indoor air quality, numerous aspects of cleaning/maintenance procedures, ensuring renovations are carefully done, using environmentally friendly landscape maintenance procedures, resolving tenant complaints, documenting successful operational tools, and training and qualifying people to pass on the knowledge. The Digital Center team will design an Operations and Maintenance Plan covering each of these issues in depth, and prepare an Owner's Manual to describe the proper operation of the Center. In addition, each occupant will receive a pamphlet describing how to care for the buildings, and how to make the buildings work for them.

Building operations and maintenance significantly impact the internal and external building environment. The initial work of the design team is a small fraction of the total requirements over the life of the Center. Efforts to make the Center environmentally responsible must be continued and enhanced by the occupants. Lucasfilm maintains exceptionally high operational standards in all its facilities. The buildings will be designed for low maintenance and will limit use of toxic containing materials to a minimum.

Operational practices will also include considerations of use patterns and interactions with the surrounding neighborhoods. A minimal parking requirement will result from an extensive ridesharing program such as is currently in operation at the Skywalker Ranch facility in Marin County. This program offers assistance

and incentives for forming car pools and provides taxi rides home if an employee has to work late or has an emergency requiring early work departure.

ENERGY MANAGEMENT

The combination of the Presidio's microclimate with the strategy of a campus-like design, makes it fairly straightforward to produce very comfortable and highly efficient structures. Overall, we project the Center's energy use to be more efficient than allowed by California's Title 24. Daylighting and natural ventilation are extremely efficient forms of renewable energy.

The Energy Management strategies for the Letterman Digital Center rely on two simple interrelated principles. First, reduce the demand for energy through thoughtful, integrated systems design; and then second, efficiently supply the remaining energy required to provide a healthy, comfortable, and enjoyable work environment. Any technology or system chosen should enhance the comfort and performance for the buildings and occupants.

Reduced Energy Demand

The Letterman Digital Center Team's design reduces energy demand by maximizing the buildings' ability to rely primarily on daylight and natural ventilation. Both the form and orientation of the proposed buildings contribute to reducing the Center's energy demand. The buildings have relatively narrow floorplates with multiple floors that are well oriented for optimal solar access. Sheltered courtyards protect adjacent buildings from temperature extremes. Building enclosures or envelopes will be thermally optimized by highly efficient glazing, sealing and insulation.

- ***Daylighting***

Effective daylighting is simple and elegant. Well-designed daylighting reduces energy demand by offsetting the need for electric light. The system has direct and indirect benefits. 35-1

Designing narrow buildings where most of the usable space is within 30 feet of windows maximizes this benefit. An additional plus is the Digital Center's unique mix between folks who need dark work space and others who appreciate the daylight. Circulation, meeting space, and some work areas can be put on the daylit perimeter, and dark spaces located in the core. The zone of the building where daylighting is effective is increased by lightshelves which help get daylight deep into the core spaces. The direct benefit is that the optimized daylighting design is expected to provide nearly 100% of normal ambient light levels during the daytime.

As a secondary energy reduction benefit, reduced electric lighting eliminates the heat load from electric lighting. This reduces the need for space cooling. Thus daylit buildings directly reduce electricity demand and indirectly reduce cooling demand.

One of the most important benefits of daylighting is that it provides a high quality workspace. Daylight changes subtly in connection with time of day and weather, thus connecting occupants psychologically to the outside. Additionally, daylight is full spectrum light, which gives true color rendition and which artificial light sources poorly emulate. The Letterman buildings will provide the real thing.

- ***Operable Windows***

For large portions of the year, San Francisco's mild climate can provide all of the necessary cooling for the Letterman buildings. Operable windows are a simple and energy efficient way to introduce that air to the workspace. As part of a properly designed system, open windows deliver cool, fresh air using little or no energy. Operable windows provide connection to the outdoors, increased occupant control of their surroundings, and free cooling in a simple package. Occupants of the Digital Center will be able to open or close their windows as they desire.

- *Electrical Loads*

A total connected lighting load of 0.8 watts per square foot is our design target. This is based on a daylight responsive lighting strategy called task/ambient design. This strategy optimizes both occupant visual

acuity and energy use. The target for as-used or "plug" loads will be determined by actual measurement of Lucasfilm's existing facilities. Reductions in internal heat gain loads also reduce required cooling capacity.

- *Raised Floors*

Raised floors play a central and major role in the integrated design (site, architectural, mechanical, electrical, and structural) for the Letterman buildings. The Letterman Digital Center design uses a raised floor system with displacement ventilation throughout all occupied floor plates. This provides multiple benefits, including both load reductions and increased efficiency.

The raised floor is a simple air distribution system. Conditioned air is supplied through the raised-floor plenum to the room via grilles in the floor surface. When the building needs cooling, as office buildings typically do most of the time, cool air is introduced low in the room directly to the occupied zone. Hot air from the room naturally rises and is exhausted at the ceiling, assisted by pressure from the cool air below.

This simple system reduces the amount of energy a building requires to produce comfortable and healthy working conditions. Heat removal occurs through natural convection plumes, which are particularly effective in a computer intensive environment. Because heat from people and equipment rises directly up and out, less cooling energy is needed to maintain a comfortable temperature. This simplified flow also makes operable windows effective.

Pollutants follow a similar path up and out of the room. This avoids the forced mixing of fresh and stale air typical in earlier office buildings. Air stays fresher in the occupied zone.

Raised floors use considerably more "free cooling" than standard systems. Standard systems deliver 55-degree air. For several reasons, air in a raised floor system arrives at a more comfortable 65 degrees. This means that for a much larger portion of the year, the Digital Center's air handlers can bring in outdoor air directly without any conditioning other than filtering. The climate at the Presidio site is ideally suited to maximizing free cooling; for most of the year outdoor air temperatures are below 65 degrees. 35-1

Occupants can control the temperature of their work environment. Air supply outlets in the floor are easily adjustable, and there is approximately one outlet per work station. Anybody can simply rotate the top plate on the diffuser and increase or decrease the airflow.

Removing overhead ductwork and using a flat plate concrete structure yields a higher floor-to-ceiling height. This improves daylighting, even while potentially reducing floor-to-floor height.

Lastly, raised floors make office reconfiguration significantly more efficient. Electrical, telephone, and data lines can be quickly rerouted. Without ducts to move or reconfigure, HVAC systems can be updated to suit new arrangements by simply moving floor tiles and diffusers. This reduces material waste while providing the flexibility to help keep these buildings serviceable much longer than typical office buildings.

- *Night Ventilation or "Pre-cooling"*

An HVAC strategy tied to a raised floor displacement ventilation system also allows "pre-cooling", or using the structural slab for thermal storage of night ventilation. Night temperatures are lower than peak afternoon temperatures. When the building ventilation fans run at night, the concrete slabs release a considerable amount of heat into the night air flowing over them. During the day when the building needs cooling, the process works in reverse and the slabs absorb heat from the building. Pre-cooling will reduce the peak cooling demand in the Letterman buildings. And, because the fans run at night, they use off-peak electricity that is readily available and less expensive.

- ***Efficient Central Plant***

An efficient central plant makes up the last element in the smart energy supply strategy for the Letterman Digital Center. As mentioned above, the plant will make primary use of cool outdoor air from the mild San Francisco climate to meet a large portion of the cooling load. For the portion of the cooling load that cannot

be met this way, the plant will use a heat exchange system coupled to the groundwater below the site to provide cooling.

The Letterman site sits above a sizable groundwater aquifer. The temperature of this groundwater is approximately 60 degrees, which is ideal for use by the central plant. For comparison, mechanical chillers typically cool water to between 50 and 55 degrees. Without removing any water from the aquifer or affecting the quality of the water, the Letterman plant will use the renewable cooling potential from that water to provide cooling to the buildings. We are investigating innovative means to accomplish this, such as using the mass of the building foundations, which will be below the water table. The effect on the aquifer will simply be an inconsequential temperature increase. Using this system means the buildings will not need to have cooling towers with their related steam plumes and other issues.

STORMWATER

The Letterman Digital Center is designed to produce less stormwater runoff than the current conditions. The Center will capture stormwater to supply water for irrigation and the water feature. The first flush of rainfall would be captured through the landscape and the lagoon. Subsequent rainfall would recharge a cistern built from portions of the existing LAMC and LAIR basements, which are not re-used for parking. This capacity will also augment water available for firefighting. Wherever possible surface pavings such as roads and walkways will be pervious to water.

WATER SUPPLY

The Letterman Digital Center Team has carefully examined water uses in the new facilities. Since a hospital is inherently a large water user, we do not anticipate that the Digital Center will have a higher demand than the existing facility had historically. 35-1

If a source of reclaimed water is determined to be available in the reasonable future, the Digital Center buildings can be double plumbed for reclaimed water usage. This means that a separate system would be installed to supply tertiary treated water to plumbing fixtures such as toilets and urinals, which do not require potable water. Unfortunately, the buildings themselves will not generate sufficient grey water to supply this need. Use of reclaimed water, however, would enormously reduce the Center's demand for potable water.

LANDSCAPE AND HABITAT

The existing landscape at Letterman is largely mature trees like, stone pines, and the interior of the Lucasfilm campus presents the opportunity to set the standard for the rest of the park.

Existing trees deemed historically significant will remain. Specialists will be consulted to recommend native plants where viable and drought tolerant, non-invasive plants will be sought to conform to sensible use of water. Non-monoculture lawn is an appropriate choice given the programmatic requirements. In all cases, the intensive use of the site will be considered in the choice of appropriate ground covers, plants, and trees, soil amendments will also be considered to improve water retention. These new well adapted plants will lower the frequency of pests and diseases thereby lowering maintenance needs. Plant selection and management criteria set forth by the Presidio will further eliminate the problems presented by exotic invasive plants. The sensitive selection, control, and maintenance of all plantings will thus allow the ecological and historical intent of the master plan to show through for future generations.

FINAL THOUGHTS

In the Greening of the Presidio charrette, using the conversion from a military base into a setting for sustainable enterprises was discussed as being the main theme for the park. Setting an example for the future was a common theme, but what is it? How do you show how a sustainable future looks?

The way to find out what the future will be, is to create it yourself. A sustainable future is about fundamentally changing the way that we live and how businesses create services and products. Just as Luscasfilm is redefining the way movies are made and children are educated, we define the future. Digital imaging and the visualization of complex data and information is absolutely one of the core competencies of the Lucas companies, and it is a crucial ability for tackling the complex issues involved in sustainability.

In the design of the buildings and grounds for the Letterman Digital Center, and in the existing renovation that created the Thoreau Center for Sustainability, environmental issues such as energy use (which is the key factor in global warming), water use and runoff (for the health of the bay and upstream ecosystems), and materials use (landfills, habitat destruction, indoor air quality) are handled in an integral fashion. These are key considerations in creating buildings for a sustainable future. The Letterman Digital center is located at a major symbolic entry for the Presidio, and is a set of buildings and a landscape that will age gracefully. The Panama Pacific Exposition marked the beginning of a century of enormous growth; unfortunately much of it was disruptive and damaging to the environment. The Letterman Digital Center at the Presidio celebrates the beginning of a century, one that we hope will be remembered for ecological restoration and the growth of vibrant new cultures and economies. 35-1

William D. Browning
Founder, Green Development Services
Rocky Mountain Institute

Sustainability and green building services consultants for the Letterman Digital Center Team.

Response to Comment in Letter 35

35-1

Thank you for your letter. As noted in the letter, the commentor is the sustainability and green building services consultant with the development team for the Digital Arts Center. The commentor addresses techniques that would be employed to meet the Presidio Trust's sustainability goals for the project as discussed in Section 1.3.9 (Environmental Sustainability). The Presidio Trust would work with the consultant during planning, design, and construction of the project to ensure that these and other practices are incorporated into the final product to ensure it is a model of sustainable development. No further response is warranted.

Letter 36

PLANNING DEPARTMENT

City and County of San Francisco 1660 Mission Street San Francisco, CA 94103-2414

(415) 558-6378 PLANNING COMMISSION FAX: 558-6409 ADMINISTRATION FAX: 558-6426 CURRENT PLANNING/ZONING FAX: 558-6409 LONG RANGE PLANNING FAX: 558-6426

August 2, 1999

NEPA Compliance Coordinator -- Attn: Letterman Complex
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

Dear Coordinator:

Thank you for the opportunity to review the Draft Environmental Impact Statement (EIS) regarding the Letterman Complex. As you are aware, San Francisco has jurisdiction over residential and commercial neighborhoods immediately adjacent to the Presidio, as well as some of the public right-of-ways that would be affected by the proposed project. Changes to facilities within San Francisco jurisdiction would require authorization from the City, as would long-term access to City services such as sewer treatment and water supply.

This letter and attachments provide comments on the Draft EIS from staff of the San Francisco Public Utilities Commission, San Francisco Planning Department, and San Francisco Department of Parking and Traffic, and the Municipal Railway (MUNI). Comments reflect input from individual members of the San Francisco Board of Supervisors, and public testimony received at the Board's Public Health and Environment Committee on June 29 and July 22, 1999.

Purpose and Need

- City staff is cognizant of the unique challenges associated with the long-term sustainability of the Presidio, and we believe that most San Franciscans are supportive of development efforts necessary to ensure the preservation of the national park. It is difficult to determine from the Draft EIS, however, precisely *why* development of the Letterman Complex at the intensity envisioned is necessary to achieve this goal. For the benefit of all, please summarize budgetary needs of the Trust, including the cost of anticipated capital improvements, and the revenue associated with leasing of existing facilities. Demonstrate *how* the proposed development is "needed to achieve the Presidio Trust Act's mandate that the Presidio Trust be financially self-sufficient by 2013" (Draft EIS, p. 3). 36-1

Water Supply

- The City and County of San Francisco is under no obligation to supply water to the Presidio. San Francisco has historically supplied water to the Presidio under extraordinary circumstances on an interruptible basis, such as during the water treatment rehabilitation 36-2

project by the National Park Service. Supplies of water for contingency and emergency purposes could possibly be made available in the future through connections between the City and County of San Francisco and the Presidio, but would require appropriate additional facilities for such service. Required facilities would include additional water service and storage facilities near or in the Presidio for fire flows and other purposes. 36-2

- By calling for general water conservation practices and the use of an (unspecified) alternate water supply, Mitigation Measure WS-2 may not be effective in resolving potential water supply problems at the Presidio. The City and County of San Francisco is developing recycled water in phases. Recycled water for the east part of the Presidio will not be available until the final phases of this program, if at all. We suggest that on-site reclamation be considered as an alternative way to meet the conservation goals articulated in the EIS. 36-3

- An overall plan for water use, water reclamation, and water conservation at the Presidio should be developed to comprehensively addresses these issues for build-out of the entire Presidio. Without such a planning document, it is difficult to see how the monitoring of flows in Lobos Creek called for in Mitigation Measure WS-3 will adequately protect that resource from over use. City staff would like assurances that there is sufficient water supply to provide for all projected development at the Presidio before incremental project approvals lead to an "emergency" where none should exist. 36-4

- Additional information should be provided regarding in-stream flows necessary to protect Lobos Creek. How was the figure of 0.5 mdg (p. 53) arrived at? What are the implications for other users of water on the west side of San Francisco? 36-5

Sanitary Sewage

- San Francisco is under no obligation to accept sanitary sewage from the Letterman complex or from the Presidio as a whole on a long term basis. As explained (Draft EIS p. A-6), Letterman's existing sanitary sewer system discharges into the City's combined sewer system and receives treatment at the City's Southeast Water Pollution Control Plant (SEWPCP). While the SEWPCP currently has sufficient dry weather capacity to accept maximum flows from the Letterman complex (estimated at 78,000 gallons per day), there is substantial public concern regarding the discharge of partially treated sewage from the SEWPCP during major storm events. 36-6

  Development at the Presidio will contribute incrementally to overflow (CSO) volumes, and we encourage the Trust to consider ways to off-set increases in CSO volumes attributable to increased sanitary flows. Possible techniques for off-setting increases and for addressing

long term water supply issues include on-site reclamation/treatment of sanitary sewage. Consideration should also be given to on-site storage of sanitary sewage during wet weather events, and redirecting flows from the SEWPCP to the City's Oceanside facility. 36-6

Drainage and Water Quality

- Alternative 5 (Digital Arts Center) is described as containing a "water resource management system" providing for the collection and storage of storm water in underground cisterns, and the use of this water for irrigation "after biofiltering through the lagoon and wetlands" (pp. 33-34). Mitigation includes "structural and operational best management practices" such as oil/water separators, infiltration systems, detention basins, and biofilters, erosion control, maintenance activities, pavement cleaning, tenant controls and education, and etc. (P. 35).

  There is insufficient information provided to evaluate the project's impact on water quality or the effectiveness of suggested BMPs. Development at the Presidio will substantially increase vehicular use, and will result in increased pollutants in storm water. The EIS should estimate the volume of storm water collected and reused and the volume discharged to the bay. The EIS should also specify projected concentrations of pollutants in bay discharges. If a lagoon or wetlands will be used as "biofilters," how will these areas be monitored and maintained? How will the gradual build-up of pollutants in these areas be prevented or addressed? 36-7

Transportation and Air Quality Issues

- The proposed signalization of the Lombard/Lyon intersection is on City property, and could be implemented only with the City's agreement and authorization. Funding would need to be secured. Concurrent with installation of this signal, and installation/modification of other signals also requiring City authorization, the City may require other improvements to aid the flow of traffic, transit, and pedestrian access. A pedestrian over crossing from the Presidio to the Exploratorium could increase pedestrian safety and improve physical connections between the City and the Presidio. 36-8

  The source of funding for transportation improvements affecting State-owned facilities should be identified, and consideration should be given to the potential applicability of Section 4(f) requirements if any approval or funding is anticipated from agencies within the US Department of Transportation.

- While the EIS acknowledges that the San Francisco County Transportation Authority is engaged in planning for Doyle Drive (p. 108), it fails to discuss access to the Letterman 36-9

complex in the context of identified Doyle Drive alternatives. The justification that "substantial development [of Letterman] would occur prior to reconstruction of Doyle Drive" (p. 110) is insupportable given the obligation under NEPA to consider reasonably foreseeable projects and the State's mandate to address deficiencies associated with the existing Doyle Drive facility.

The EIS should include an illustration of the Doyle Drive interchange referred to on p. 110, and should discuss if any previously identified alternatives for Doyle Drive would be precluded by the proposed development at the Letterman site. The EIS should also consider the implications for Gorgas Avenue access to the Letterman complex given conclusions of the Doyle Drive Task Force study. 36-9

In the absence of an interchange, how would access to the Letterman site slow traffic and transit operations along what is considered a regional transportation facility? Could access to Letterman be relocated to the west, so as to distribute traffic through the Presidio, rather than focussing it at one or two intersections?

- We understand from Presidio Trust representatives, that the illustration of the Richardson Avenue/Gorgas Gate intersection (p. 109) is incorrect, as is a (slightly improved) illustration in the background Transportation Technical Report dated April 14, 1999. Please revise the EIS to include an accurate sketch showing the existing intersection configuration and proposed improvements. Please also provide a detailed drawing (at 1"=50' scale) to the City and Caltrans to allow a determination as to whether sufficient right-of-way exists for the proposed improvements. 36-10

- The suggestion that a second signal is required in order to maintain the two-phase signal operation at Lyon/Richardson/Gorgas (p. 108) is confusing, since that the intersection is planned to have three phases regardless of the second intersection. 36-11

- The EIS does not address potential impacts associated with removal of the existing traffic signal at Richardson/Francisco. In addition to affecting traffic circulation, elimination of this signal and forcing right turns at this location may impact bicycle circulation along an existing bicycle route, and may affect pedestrian access to transit stops on Richardson Avenue. 36-12

- Citizens of the Marina District have expressed concerns regarding the potential for increased through traffic along Marina Boulevard as a result of proposed traffic signals and other circulation changes on Richardson, Gorgas, and Lombard. It is the City's policy to discourage and reduce through traffic along streets such as Marina Boulevard (Transportation Element Policy 18.5, *San Francisco General Plan*). The EIS should clearly describe trip 36-13

origin/destination assumptions, existing and future traffic assignments, and the rationale for each. Measures to monitor traffic increases within and adjacent to residential neighborhoods should be considered, along with actions to address these increases should they occur. 36-13

- The EIS should describe on-street parking conditions on City streets in the vicinity of the Letterman complex. Are any impacts on these streets anticipated? While (unspecified) plans to provide for a constrained parking supply (p. 107) may be desirable in terms of encouraging alternative modes of transportation, what impacts will this have on neighborhood parking supplies (e.g. the Marina Green parking areas)? 36-14

- The City's Department of Parking and Traffic has been requested to provide all-way STOP signs at the intersection of Lombard/Baker. What will the impact of stopping Lombard Street traffic at Baker Street have on access to the Presidio from Lombard Street? 36-15

- Will development at Letterman generate an increase in tour buses and shuttle buses? If so, where would the additional buses enter and exit the Presidio, where would they lay-over, what would be their hours of operation? Tour buses and charters are not allowed to operate on certain streets in the Presidio or the City. These prohibitions should be noted, along with any proposed changes. Will helicopter and water taxi service be considered to access the Presidio or the Letterman complex? Where would these services be provided, and what would be their impacts? 36-16

- Alternative 5 (Digital Arts Center) would include a "Transportation Demand Management program" which "might" include "a guaranteed-ride-home program, telecommuting policies, preferential parking program for carpools and vanpools" and other (unspecified) incentives to reduce vehicle trips (p. 33). Other features of the TDM program are described on p. 107 and 165 of the EIS. The effectiveness of TDM measures is not described, and it is unclear whether the analysis of regional and localized air quality assumes that these measures will be implemented, and with what success rate. We suggest that the Presidio Trust develop specific performance targets, monitor non-auto mode shares, and take steps to increase incentives if targets are not met. 36-17

- The description and illustration of transit services (pp. 1-10 and 1-11) should be corrected. Line 29 does not run south of Lombard Street on Presidio Boulevard as depicted. The outer terminal for Lines 41 & 45 is currently on Lyon between Greenwich and Baker. The long-line terminal for Line 29 is located at Letterman. These should be indicated on the map. Line 76 is not indicated on the map. Lines 30 and 30X are not described in Table 1.4. 36-18

- The City's Municipal Railway (MUNI) uses a cumulative approach whereby 63 new passengers equate to one standard coach of service demand, with the system assumed at capacity unless demonstrated otherwise for individual lines. Cumulatively 122 new PM Peak riders with external destinations as generated by Alternative 5 would equate to almost two coaches of demand. MUNI questions the validity of the trip generation numbers presented, since the number of transit trips seems low for a project of 900,000 sq. ft. 36-19

- The extension of MUNI trolley coach lines 41 and 45 into the Presidio has been programmed in MUNI's Ten-Year Capital Improvement Program since 1996, as requested by GGNRA planners. However, capital funds have not been identified to implement this project. Funding should be provided (directly or through the City's Transit Development Impact Fee program) for the extension of the 41-Union and 45-Union-Stockton MUNI bus lines into the Presidio and to the Letterman complex (capital and marginal operating costs). 36-20

- Several of the Alternatives considered would result in significant regional emissions of NOx, although Alternative 5 falls just below the BAAQMD standard (74 instead of 80 lbs/per day) (p. 167). Clearly when considered in the context of other developments at the Presidio, there is reason for concern associated with cumulative emissions from traffic. We encourage the Presidio Trust to consider other measures to reduce vehicle trips, measures to increase transit use, and measures to encourage the use of alternative fuels. Fueling stations and preferential parking should be provided for alternative fuel vehicles. 36-21

Housing Demand

- According to the EIS, Alternative 5 (Digital Arts Center) would result in the demand for about 481 housing units, of which 265 could be supplied at the Presidio (p. 163). A mechanism for reserving Presidio housing for Letterman employees is not described. 36-22

  It is unclear why the unmet demand for housing (estimated at 216 units in the EIS) is dismissed as insignificant in the context of cumulative development at the Presidio and elsewhere in the region. San Francisco is currently experiencing a shortage of housing, particularly affordable housing. In this context, any unmet housing demand would appear to be a significant *socioeconomic impact* warranting mitigation under NEPA. 36-23

  Using formulas provided in the City's Jobs-Housing Linkage program, a project of between about 600,000 and 900,000 sf of office space would be required to fund construction of between 97 and 145 units of affordable housing, or to contribute affordable housing development fees of between $4.2 and $6.3 million. 36-24

Construction Impacts

- The suggestion that Alternative 5 would be constructed in one continuous construction program (p. 34) seems somewhat unrealistic and clearly undesirable. Please consider condensing the construction period, so that facilities are constructed simultaneously, reducing the duration of exposure to construction air emissions, significant construction noise impacts, and traffic detours/congestion. Alternatively, the Trust should consider permitting the construction of site facilities in phases to allow for the monitoring of traffic impacts, transit mode share, etc. associated with each completed phase prior to authorizing construction of subsequent phases. 36-25

Again, thank you for the opportunity to comment on the Draft EIS. Please don't hesitate to call me at (415) 558-6381 if I can answer any questions regarding the comments provided above, or if I can supply any information to assist your staff in preparing the final document.

Sincerely,

Hillary B. Gitelman
Environmental Review Officer

cc. Supervisor Tom Ammiano
Supervisor Gavin Newsom
Members, San Francisco Board of Supervisors Public Health and Environment Committee

HEG:WP51\CORRESP\PRESIDIO.EIS

Responses to Comments in Letter 36

36-1

Thank you for your letter. The discussion of the purpose and need for the project has been expanded in Section 1 of the EIS. In addition, please refer to the FMP in Appendix E of the Final EIS, and to master response 10A.

36-2

The Presidio Trust appreciates the City and County of San Francisco's offer to possibly supply water for contingency and emergency purposes in the future. At this time, the Presidio water system is adequate for handling emergency flow requirements. A minimum of 3 million gallons of water is maintained in the Presidio's reservoir as a reserve for fire and emergencies as required by the Presidio Fire Department. The distribution system has two large main-line connections to the CCSF's system that feed directly to the reservoir. These connections are normally closed unless there is an emergency water demand.

36-3

Refer to master response 13.

36-4

Implementation of mitigation measures WS-2, *Water Supply- and Demand-Side Solutions to Reduce Cumulative Impacts*, and WT-1, *Water Reclamation Plant to Reduce Cumulative Impacts*, would adequately address potential park-wide deficiencies in water supply, taking into account water demand based on projected development at the Presidio. Should additional solutions be explored through monitoring and additional analysis, the Presidio Trust would work with CCSF officials to ensure their concerns are addressed and any need for city water is minimized. Also refer to response to comment 36-2 and master response 13.

36-5

Additional information on minimum in-stream flows to protect Lobos Creek is provided in the Restoration Plan for Lobos Creek prepared in 1995 (NPS 1995) for the NPS. The study concluded that flows above 0.5 million gallons per day (0.77 cubic feet per second) would be required to preserve the channel depth and bank slopes of the creek to ensure the adequate protection of existing plant and wildlife habitats, and a distinct aquatic connection to the Pacific Ocean. Maintained creek flow may also prevent standing water and salt water intrusion from the ocean into the aquifer water supply. Free flow reduces mosquito breeding and protects fresh-water dependent communities, thus preserving opportunities for public enjoyment of the downstream section of the creek. Maintained flow across Baker Beach provides a unique aesthetic, recreational, and ecological resource. According to the study, should users of water on the west side of San Francisco use wells as a supplementary water supply, if the wells are located within the Lobos Creek groundwater basin, they could reduce seepage into the creek (depending on the location, number of wells, and pumping rate). Lower flows would still maintain wetland vegetation in the creek bed, but would probably not scour a clear channel across Baker Beach.

36-6

Refer to master response 14.

36-7

Refer to master response 15.

36-8

The Trust will be coordinating with the city's Department of Traffic and Parking regarding proposed improvements at the Lombard Street Gate. A pedestrian overcrossing was not proposed because of extremely limited space for an overpass terminus on the Exploratorium side of the roadway. However, the city can suggest further study of an overcrossing as part of either the Letterman Access Project Study Report (see master response 18) or Doyle Drive scoping. At the present time, state funding is not being sought for the project. The current plan does not appear to trigger any 4(f) considerations.

36-9

First Paragraph – The analysis in the EIS did not consider Doyle Drive alternatives because they have not yet been identified in the county's new study and because the Trust wanted to analyze a "worst-case" scenario where no other access points to the Presidio from Doyle Drive had been identified.

Second Paragraph – The "new interchange" referenced in Section 4.1.7 is not a specific physical structure, but rather a supposition that a future Doyle Drive is likely to include an interchange providing direct access between Doyle Drive and the Presidio. See response to comment 23-67 regarding the Gorgas Avenue alignment.

Third Paragraph – It would be extremely difficult and expensive to locate access further west because Doyle Drive is on structure at that point. Although this might prove to be the best long-term solution and should be studied as part of Doyle Drive reconstruction, it is not a feasible short-term access mitigation.

36-10

Figure 15 has been corrected. The arrows depicting the eastbound through movement at the southernmost intersection and the eastbound right-turn movement at the northernmost intersection have been eliminated from the figure. A detailed drawing of the improvement to a scale of 1:50 has not been developed. However, cross-sections of Richardson Avenue north and south of Lyon Street have been prepared for existing conditions and conditions with the proposed improvements, and have been submitted to the city's Planning Department and to Caltrans for their review. The PSR/PR effort (see master response 18) will develop the detailed drawings of these improvements.

36-11

See master response 18.

36-12

Removing the traffic signal at the intersection of Richardson Avenue and Francisco Street would be prompted by the creation of a new intersection slightly northward. The transit stop for buses traveling northbound on Richardson Avenue would be relocated to a point immediately north of Lyon Street, as shown in Figure 15. Pedestrians walking between this bus stop and the Presidio would cross at the crosswalk on the north side of Lyon Street. The bus stop for the southbound direction of Richardson Avenue would remain at its current

location, but pedestrians crossing Richardson Avenue to this bus stop would cross at the new intersection at Lyon Street, rather than Francisco Street as they do currently.

Removing the traffic signal at Richardson Avenue and Francisco Street would impact bicycle circulation. The portion of the city's bike route 4 extending from Broderick Street to Lyon Street on Francisco Street would need to be relocated to Chestnut Street (see Figure 18, Bicycle Routes in the Final EIS). This would have no significant impact on bicyclists because the distance would be the same as the current route and the portion of Chestnut Street used for the route is residential in character and similar to the Francisco Street route.

36-13

Appendix D of the EIS discusses the assumed geographic distribution of trips generated by the Letterman Complex (Table D-6), the assignment of project-generated p.m. peak-hour vehicle trips to Presidio gates (Table D-7), and Year 2010 turning movement volumes at each of study intersections (Figures D-1 through D-6). As shown in Table D-7, the majority (about 65 percent) of the project-generated p.m. peak-hour vehicle trips were assigned to the Gorgas Avenue Gate under Alternatives 1 through 5.

The proposed intersections on Richardson Avenue would provide the most direct vehicular access to the Letterman Complex, thereby minimizing any project-related impacts on the streets of the surrounding residential neighborhoods. The Presidio Trust will periodically monitor traffic volumes at Presidio gates, and is also willing to coordinate with the San Francisco Department of Parking and Traffic to monitor traffic volumes in adjacent residential neighborhoods.

36-14

A survey of parking conditions mid-morning on city streets in the immediate vicinity of the Letterman Complex, conducted for the park-wide Parking Management Study, indicated that on-street parking in the area is 58 percent occupied. All of the surveyed streets have time restrictions limiting non-residents to either 2 or 3 hours. Because the project-related parking demand would be largely comprised of long-term, or employee, parking demand, the time restrictions imposed on on-street parking in the vicinity of the Letterman Complex would discourage employees driving to and from the 23-acre site from parking on the residential streets near the Letterman Complex.

It is possible that some employees and visitors to the Letterman Complex and Crissy Field may seek on-street parking along the south side of Marina Boulevard and in the vicinity of the St. Francis Yacht Club and the Golden Gate Yacht Club. During weekdays on-street parking is typically available on Marina Boulevard, although vehicles without a residential permit are limited to 2 hours. Parking is also available at the curb on Yacht Road (about 200 spaces) and in the off-street lot between the St. Francis Yacht Club and the Golden Gate Yacht Club (about 200 spaces). A portion of this supply is reserved to the yacht harbor permit-holders, but, in general, this parking is available to anyone. During field surveys parking along Yacht Road was observed to be 80 to 100 percent occupied during days when events are held at the harbor and 30 to 65 percent occupied on non-event weekdays. Access to this parking supply involves at least a half-mile walk between Marina Boulevard (at Baker Street) and the Letterman Complex, and therefore it is not expected that there

would be a substantial increase in weekday parking utilization along Marina Boulevard. Please see master response 20.

36-15

The various alternatives would add between 25 and 40 eastbound vehicles and between 10 and 25 westbound vehicles through the intersection of Lombard and Baker streets during the p.m. peak hour. The intersection of Lombard and Baker Streets currently has all-way stop signs, and the currently most congested approach (southbound) operates at LOS A during the p.m. peak hour. Under Existing plus Project conditions, the addition of 40 eastbound and 25 westbound vehicles through this intersection would not change the southbound approach's operating conditions from LOS A. Under cumulative (year 2010) conditions, the southbound approach would operate at LOS C, with and without the addition of traffic generated by the proposed project (note: the stop signs were installed subsequent to receipt of the comment).

36-16

Regarding tour buses, see response to comment 32-5. Helicopter and water taxi service are not expected as part of the Letterman access project. The Trust is working with the GGNRA to plan water access at Torpedo Wharf on Crissy Field with connection to the Trust internal shuttle. However, no water taxi trips were assumed in the traffic analysis for the EIS.

36-17

See master response 19.

36-18

The commentor is referring to figures in the Transportation Study Report that were prepared to provide background transportation information for the Draft EIS. The 29-19th Avenue line does run south of Lombard Street on Presidio Boulevard. The 76-Marin Headlands line is not shown on the illustration of transit routes and is not included in the transit analysis because of its limited operating hours. Because it operates on Sundays and holidays only at a one-hour headway, its operating hours are inconsistent with the weekday p.m. peak hour analysis period. However, the operation of this line is discussed in the text of the Transportation Study Report. Because the 30 and 30X operate within the area depicted in the illustration of transit services, these MUNI lines were shown in the figure. In response to the comment, a description of MUNI lines 30 and 30X and of the terminal locations of each described MUNI line has been added to the description of transit services in the Transportation Study Report.

36-19

The proposed methodology for calculation of transit demand is not appropriate for the Letterman Complex. Although the MUNI lines that serve the Presidio are well-used, the maximum load points (MLPs) on most of these lines are quite far from the Presidio, and sufficient capacity exists on these lines to accommodate the additional demand that would be generated at the 23-acre site. The number of trips that would be generated at the site is based on the trip generation rates that were developed after researching rates from several different sources, including the San Francisco Guidelines for Environmental Review, the Institute of Transportation Engineers Trip Generation and the Presidio Validation Study, 1988. Mode split assumptions are based on

Presidio employee survey results and analysis contained in the 1994 GMPA. The 23-acre site is located far from downtown and consequently has a lower transit mode split than sites located more conveniently to the MUNI bus and rail network.

36-20

The Presidio Trust agrees with this comment and will be working with MUNI to develop funding for this program.

36-21

The Presidio Trust is actively working in all the programs cited to help reduce vehicle emissions. A number of other comments discuss overall vehicle trip reduction. In addition, the Trust is currently moving toward having its own fleet (which services the park) on alternative fuels and has started by converting 15 trucks to all-electric operation. The Presidio has a CNG fueling station that services Trust as well as other public vehicles. The Trust is working to develop an alternative fuels car-sharing program and the proposed internal shuttle will use alternative fuels. Preferential parking for alternative fuel vehicles will be considered as part of the Trust's parking management program.

36-22

All housing leases at the Presidio currently are one-year leases. As these leases come up for renewal, Presidio-based households (households with at least one employee of a Presidio-based tenant organization) have priority for leasing. As of September 30, 1999, the end of the Presidio Trust's fiscal year, there were 236 Presidio-based households out of 731 total units leased, with 385 units still to be made ready for leasing. This capacity to accommodate Presidio-based households, coupled with normal turnover, will allow the Presidio Trust to accommodate the employee demand for 265 housing units associated with Alternative 5.

36-23

The housing demand is quantified in Section 4.5.5.1, Increase in Housing Demand, to provide a benchmark for understanding the level of effect on San Francisco and the Bay Area. The determination as to whether a less than one percent increase in demand for housing would be considered a significant impact is somewhat subjective. However, the shortage of housing in the city for low- and moderate-income groups is noted, and the text in Sections 4.3.5.1 and 4.5.5.1 of the Final EIS has been revised to note the adverse impact on affordable housing in the city.

To limit the demand for affordable units in San Francisco, the Presidio Trust offers reduced rental rates to Presidio employee and tenant households with gross household incomes of less than $45,000. As Presidio buildings are reoccupied and park programs and activities are established, the need for additional onsite housing, including affordable housing, would be analyzed based on actual employment patterns and related housing demands associated with building uses.

36-24

Development within the Presidio is under exclusive federal jurisdiction and is not subject to city housing impact fees. The Presidio Trust applies revenues from market rate residential and non-residential leasing to

make it possible to reduce rental rates to households with gross household incomes of less than $45,000 (see response to comment 36-23).

36-25

As in all construction, there are tradeoffs between having tight restrictions on activity (e.g. time-of-day restrictions) that prolong the construction process while lessening the impacts during construction, and fewer restrictions that shorten the construction period. These will be addressed as described in mitigation measure TR-5, *Construction Traffic Management Plan*.

Letter 37

July 30, 1999

NEPA Coordinator
ATTN: Letterman Complex
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, Ca. 94129-0052

Via Fax: 415/561-5315

Dear Mr. Pelka,

I am happy to write a letter in support of Letterman Digital Arts. I understand the general plan calls for the Presidio to be used for arts, education, research, innovation, communication, and community service. Letterman Digital Arts meets every requirement.

As an independent filmmaker in the Bay Area for over 20 years, I know the importance of building a local community of artists and technicians. The Lucas companies have been built on a simple philosophy. You hire talented people, train them, give them a creative environment to work in, provide them with the resources to experiment, and nurture them. The results have been phenomenal. ILM is world renowned as the leader in special effects, THX has set new standards in sound and changed the way audiences see and hear films, and LucasArts has provided the best in inter-active entertainment since its inception. The entire industry benefits from the technological breakthroughs pioneered by the Lucas companies and by the talent trained by these companies. A recent article cited the successful start-up companies founded by former employees of ILM and LucasArts. 37-1

Building an eclectic artistic community at the Presidio site is important for San Francisco. As a longtime resident of the Bay Area, I am delighted the Presidio Trust recognizes that Letterman Digital Center will benefit the city and the entire area by continuing its tradition of attracting the best and the brightest to this community.

Sincerely,

Francis Ford Coppola

916 KEARNY STREET SAN FRANCISCO CA 94133 PHONE 415-788-7500 FAX 415-989-7910

Response to Comment in Letter 37

37-1

Thank you for your letter. The organization's support of the Letterman Digital Center is noted for the record.

Letter 38

ADRIANA PAASCHE DAKIN

765-H Portola Street • The Presidio • San Francisco, CA 94129
Tel: 415-441-1804 • Fax: 415-561-7778 • apd@igc.org

PRESIDIO TRUST REC'D

1:03

Date: July 30, 1999
Re: **Letterman Hospital Complex**

Dear Presidio Trust:

As a Presidio resident and employee (Center for Citizen Initiatives within the Tides Center), the decision to invite the Lucas companies to be a tenant in the Letterman Hospital complex makes me worried. Regarding Lucas' 2,500 staff and significant building plans, I am especially concerned about the potentially serious **environmental** impact on the Presidio National Park.

38-1

I hereby voice my dissent to the decision to lease/rent the Letterman Complex to the Lucas companies.

However, I'd like to commend the Trust on recent Park improvements, including an improved fire department, park signs, and residential grounds maintenance. It's wonderful to live and work here, and I'd like to help it remain (and grow increasingly more) so.

Thank you,

Adriana Dakin

Response to Comment in Letter 38

38-1

The concerns of the commentor are noted for the record.

Letter 39

SAN FRANCISCO COUNTY TRANSPORTATION AUTHORITY
100 Van Ness Avenue, 25th Floor, San Francisco, CA 94102 (415) 522-4800 - Fax: (415) 522-4829 E-mail: sfcta@ci.sf.ca.us

July 29, 1999

NEPA Compliance Coordinator
Attn: Letterman Complex
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

PRESIDIO TRUST REC'D

Subject: Comments on the Environmental Impact Statement (EIS) Supplement – Letterman Complex

Dear Coordinator:

Thank you for the opportunity to review and comment on the Letterman Complex EIS. Proposed development at the Letterman Complex will be closely related to the planned Doyle Drive replacement project, and it will also affect circulation and parking in adjacent San Francisco neighborhoods. The Authority is commenting in its capacity as Congestion Management Agency (CMA) for San Francisco, and as lead agency for development of the Doyle Drive EIS/EIR. As CMA the Authority is the City's strategist for transportation system investment, and we have a critical responsibility to establish the link between transportation system investment and transportation system performance. We are also responsible for developing San Francisco's Long Range Countywide Transportation Plan and for developing and maintaining a travel demand model and transportation analysis database for the City.

Our comments incorporate by reference the transportation section of the letter of comments already submitted to you by Hillary Gitelman on behalf of the San Francisco Planning Department and various other City departments. In addition, we have the following specific comments: 39-1

1. Relationship to Gorgas Avenue: All five project alternatives call for significant new development on property immediately adjacent to Gorgas Avenue, within the Presidio. Each alternative also anticipates improvements to two intersections along Richardson Avenue connecting to Gorgas Avenue via a couplet. All recent planning efforts regarding the Doyle Drive replacement project have at least considered the potential use of an alignment along Gorgas Avenue instead of the existing alignment along Richardson Avenue. The City will choose a preferred alternative at the completion of the Doyle Drive EIR/EIS in 2001. The EIS should discuss the likely conflicts between the proposed Letterman Complex and a potential Gorgas Avenue alignment for Doyle Drive, specifically addressing, from the perspective of impacts on Doyle Drive right of way, capacity, operations, and traffic safety, whether, and under what conditions, the proposed development would ultimately preclude a Gorgas Avenue alignment for Doyle Drive.

2. Effects on Doyle Drive Operations: The Doyle Drive Intermodal Study (1996) proposed the use of a transit center and signalized at-grade intersections to provide direct access to the Presidio from a new Doyle Drive. Assuming an at grade Doyle Drive parkway alignment along Richardson Avenue, the EIS should also specifically discuss the impacts on Doyle Drive traffic of reconfiguring the Gorgas 39-2

Letterman EIS, Page 2
7/29/99

intersection, and address how changed traffic signal phasing would affect Doyle Drive operations. 39-2

3. Existing Conditions: Little data are presented on existing traffic conditions. Table 15 provides data mostly from 1994 PM peak-hour traffic volumes at eight Presidio gates. Data for existing average daily traffic volumes (ADT), intersection levels of service (LOS), mode splits and similar presentations could not be found. 39-3

4. No-Action Alternative: Alternative 6, Minimum Management (No Action) includes new leasing activities and improvements to existing facilities and is, therefore, not a true no-action alternative. Data tables do not conveniently compare project alternative impacts with a no-project condition. 39-4

5. Mode Splits: Although find the estimate of mode splits in the EIS reasonable, the high automobile share (70% for external trips) underscores the need for the Presidio Trust to develop specific performance targets for the proposed TDM program and closely monitor its progress. 39-5

Once again, thanks you for the opportunity to comment, and please call me at 522-4803 with any questions.

Sincerely,

José Luis Moscovich
Director – Plans and Programs

Cc: CCC
LS
Hillary Gitelman, DCP
Dick Tilles, Presidio Trust

Responses to Comments in Letter 39

39-1

See master response 21.

39-2

The improvements near the Gorgas Avenue Gate are proposed to alleviate traffic congestion and Letterman access problems prior to a permanent Doyle Drive reconstruction (refer to master response 18). The Presidio Trust will be coordinating the proposed improvements with both Caltrans and the city to determine whether such improvements can be made part of the more extensive Doyle Drive project.

39-3

In order to ensure that the existing traffic volumes used for this analysis were the most recent and accurate possible, traffic counts were conducted during the p.m. peak period (4 p.m. to 6 p.m.) on Wednesday, January 13, 1999, and during the a.m. peak period (7 a.m. to 9 a.m.) on Thursday, January 14, 1999 at four of the five study intersections. Traffic counts were not conducted at the intersection of Marina Boulevard/Mason Street at this time due to construction activities in the area, which would not represent typical conditions. Existing counts from the GMPA EIS were used for this intersection.

The traffic counts conducted in January 1999 were compared to the traffic counts made for the GMPA EIS. Section 3.9.2 describes the average daily traffic volumes observed at the Presidio gates in 1998 and existing levels of service. Figure 11 depicts existing intersection p.m. peak-hour turning movement volumes at the study intersections, and Figures 1 through 6 in Appendix D depict the Year 2010 p.m. peak-hour turning movement volumes under each alternative. Assumed travel characteristics such as modal split and geographic distribution of trips are summarized in Section 4.1.7, and explained in further detail in Appendix D.

39-4

The no action alternative (Alternative 6) as discussed in the EIS represents no change from current management direction or level of management intensity as intended by NEPA. Under NEPA guidance, to construct a no management alternative would be an academic exercise which would provide an inappropriate benchmark to compare the magnitude of environmental effects of the action alternatives (Forty Questions No. 3 in Council on Environmental Quality 1981).

39-5

Refer to master response 19.

Letter 40

SAN FRANCISCO TREE COUNCIL

2310 Powell # 305, SF CA 94133 * sftreecouncil1@juno.com * (415) 982-8793

WE ARE DEDICATED TO INCREASE UNDERSTANDING AND APPRECIATION OF THE VALUE OF MATURE TREES, TO PRESERVE AND PROTECT THEM IN OUR URBAN ENVIRONMENT

August 2, 1999

PRESIDIO TRUST REC'D

National Environmental Policy Act
Compliance Coordinator
34 Graham St., P.O. Box 29052,
San Francisco, CA 94129-0052

Att: Letterman Complex, Presidio Trust
Re:Presidio Letterman Draft Environmental Impact Statement.

We are very much concerned with the loss of existing mature trees on our streets and in our parks due to design or development plans. The current plan for the Presidio Letterman site is the least compatible with the trust's own published guidelines and amounts to the **industrialization of our national park.** If the Presidio Trust's process has resulted in this outcome, then something is very wrong with the process!

In Appendix B, Planning Guidelines of the DEIS, states that the natural landscape guidelines are intended to **preserve, protect and enhance "natural features that include exiting mature trees,"** and the "wildlife habitat areas which occur in association with these existing trees." Unfortunately, the DEIS doesn't follow it's own guidelines. 40-1

The DEIS discussions of the affected environment (Section 3) and the alternatives don't provide any information about the **mature trees** in the area. It doesn't list the numbers, sizes, or species of trees, or their condition or age. It doesn't give an estimate of **how many would be removed** or protected and preserved, as the appendix sets as a guideline.

The Draft Environmental Impact Statement must be amended to include the information required for the public to determine the impact on the natural resources in the Presidio-Letterman site. We oppose any development that is not related to improving the quality of visitor and locals experience of their park. We urge you to preserve and protect the existing beauty and character of this priceless resource.

Sincerely,

Carolyn Blair

Carolyn Blair, Chair
SF Tree Council

Response to Comment in Letter 40

40-1

Thank you for your letter. The commentor's concerns about the loss of existing mature trees are noted for the record. The commentor pointed to inconsistencies between the Planning Guidelines and the Draft EIS which have now been corrected within the Final Planning Guidelines. In short, the Draft Planning Guidelines were erroneous in assuming that all existing mature trees would be preserved and protected. Rather, the intent of this section of the Planning Guidelines is to preserve and protect existing mature trees that have been identified as having the most valuable wildlife habitat (based on observed bird diversity and use) as discussed in Section Q, Wildlife, of Appendix A of the EIS. These mature trees would include the coast live oaks, the palms, the redwood, and the eucalyptus trees and Monterey pines within the historic windrows bordering the 23-acre site. Please refer to the text revisions within the Final Planning Guidelines for additional clarification on this subject. Concerning the need for additional information about the mature trees within the 23-acre site, refer to master response 16.

Letter 41

LETTERMAN DIGITAL ARTS LTD.

August 2, 1999

Sent Via Facsimile and U.S. Mail

NEPA Compliance Coordinator - Attn: Letterman Complex
Presidio Trust
34 Graham Street, P.O. Box 29052
San Francisco, CA 94129-0052

Re: Letterman Complex Draft Supplemental Environmental Impact Statement

Dear Coordinator:

Letterman Digital Arts Ltd. ("LDA") is honored that the Presidio Trust has chosen the LDA proposal at its preferred alternative for the redevelopment of the site of the former Letterman Hospital at the Presidio.

We have reviewed the Draft Supplemental Environmental Impact Statement ("EIS") and agree with the conclusion that the Letterman Digital Center will help fulfill the Trust's objectives for the Presidio. Together with the Trust and other Presidio tenants, LDA would create a center for research, learning and commercial activity that will exist harmoniously with nature and history.

In addition, we would like to submit the following minor comments on the draft EIS:

- Summary: p. vi: Alternative 5: Digital Arts Center

  Comments: The summary description of the Digital Arts Center should reflect that the work of the proposed LDA tenants has applications beyond the entertainment industry. We suggest the following clarification (inserted text underlined): "This alternative would provide an office campus for several units of a single company engaged in research, development and production of digital arts and technologies related to the entertainment ~~industry~~, education, communications, and other industries." 41-1

  In addition, this description should make clear that the landscaped open space will be open to the public. We suggest the following clarification: "This alternative would devote a portion of the site to a landscaped open space designed for use by "the public, employees of the facility, ~~and~~ Park visitors, neighbors, and other Presidio tenants."

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Page 2

- Alternatives: pp. 31, 2.5.1: Concept

  Comment: Again, the description of the "Great Lawn" should reflect that the Digital Arts Center Alternative will include a public park. We suggest the following clarification: "A 'Great Lawn' or public park with a water element would be a significant site feature for Park visitors and Digital Arts Center employees." 41-2

- Alternatives: pp. 31-32, 2.5.3: Activities and Program

  Comment: LDA is pleased to advise that, in addition to the other tenants proposed in our original proposal, the George Lucas Educational Foundation would be a tenant of the Digital Arts Center. This section should reflect this non-profit educational foundation as a proposed tenant. 41-3

- Alternatives: p. 33, 2.5.4: Community and Support Services

  Comment: This section should state that a public restroom, in addition to a public café and coffee bar, will be provided. This should also be noted in Table 1: Summary of Alternatives at p. 14. 41-4

- Alternatives: p. 33, 2.5.5: Access, Circulation and Parking

  Comment: The first paragraph should state that the Digital Arts Center alternative will include 30 surface visitor parking spaces in addition to the 1500 car underground garage. This should also be noted in Table 1: Summary of Alternatives at p. 15. 41-5

- Mitigation Measures Included as Part of Alternatives 1 Through 5:

  - pp. 35-36, 2.6.3: Water Supply and Distribution

    Comments: LDA has the following comments on the proposed mitigation measures:

    WS-1 (Fire Flows): We suggest the following clarification: "The selected development team would be required to implement one or more of the following actions: fix specific deficiencies in the on-site water distribution system . . ." 41-6

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Page 3

WS-2 (Water Conservation Practices): We suggest the following clarifications:

First bullet: "Install water meters and develop marginal cost pricing incentives as long as base allotment is adequate." 41-7

Fifth bullet (p.36): ". . ., such as the anticipated use of reclaimed water from the city of San Francisco water system for Presidio irrigation purposes, from an on-site well, or by exchange underground water from other sources."

- pp. 36-37, 2.6.5: Traffic and Transportation Systems

Comments: LDA has the following comments on the proposed mitigation measures: 41-8

TR-1 (Lyon Street and Richardson Avenue and Gorgas Avenue Intersection Improvements): LDA will cooperate with the responsible agencies in planning these improvements.

TR-2 (Lombard Street - Lyon Street Intersection Improvements): The following language should be added as a final sentence to the language for this mitigation measure: "The development team's financial participation in this improvement, if any, would be based on a fair share basis, and on costs at the time of approval of a specific Letterman redevelopment project by the Trust, after review of preferred solutions for the traffic impacts to this particular intersection. The "fair share" would be based on the calculations set forth in the Final SEIS." 41-9

TR-3 (Lombard Street/Presidio Blvd Intersection Improvements): The following language should be added as a final sentence to the language for this mitigation measure: "The development team's financial participation in this improvement, if any, would be based on a fair share basis, and on costs at the time of approval of a specific Letterman redevelopment project by the Trust, after review of preferred solutions for the traffic impacts to this particular intersection. The "fair share" would be based on the calculations set forth in the Final SEIS." 41-10

TR-4 (Adjusting and Monitoring Parking): Adjustment of available parking would not be applicable to the Digital Arts Center alternative, because the parking is fixed and based on known uses. 41-11

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Page 4

- pp. 42-43, 2.6.14: Human Health, Safety and the Environment

  Comments: LDA has the following comments on the proposed mitigation measures:

  HH-1 (Asbestos Remediation): This mitigation measure should clarify that the party conducting the building demolition would be responsible for compliance with the applicable regulations. We suggest the following clarification (third line): "The ~~development team~~ party conducting the building demolition would be responsible for compliance with all . . . " 41-12

  HH-2 (Lead-Based Paint Abatement): This mitigation measure does not indicate a party responsible for the abatement. We suggest the following clarification: "Prior to initiating building demolition within the Letterman Complex, the party conducting the demolition would prepare, and ensure compliance with, a management and remediation plan for lead-based paint ~~would be prepared~~ to reduce impacts . . ." 41-13

  HH-3 (Contingency Plan): It appears that the contingency plan would apply to the whole 60 acre Letterman Complex. As such, the plan should be developed by the Presidio Trust. We suggest the following clarification: "Prior to ~~initiating~~ the initiation of subsurface construction within the Letterman Complex, the Presidio Trust would develop a Contingency Plan ~~would be developed~~ to provide . . ." 41-14

- Table 9: Summary of Environmental Consequences: p. 80

  Comment: The summary of the consistency of the Digital Arts Center with the GMPA should be corrected to refer to Alternative 5, rather than Alternative 4. 41-15

- Environmental Consequences, pp. 162-63, 4.5.1.2: Presidio General Management Plan Amendment

  Comment: We believe that the following change better reflects the Digital Art Center's consistency with the GMPA: "Alternative 5 would be consistent with the GMPA's general objective to provide for appropriate uses of the Presidio. In particular, the inclusion of 1) companies developing cutting-edge technologies in the digital and interactive arts and sciences; 2) a company developing interactive educational software; 3) a non-profit foundation devoted to promoting innovative efforts to improve education; and 4) an internet-based tenant applying advanced digital arts and 41-16

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Page 5

technologies to on-line communications, will be consistent with the objective to provide uses, ~~particularly those~~ that involve the arts, education, research, innovation, and communication." 41-16

- Environmental Consequences, pp. 164-66, 4.5.7: Traffic and Transportation Systems

  Comment: There appears to be arithmetic miscalculations of the traffic impacts at one specific location and of the parking demand for Alternative 5. More specific technical comments on these issues will be provided under separate cover from Fehr & Peers Associates, Inc. 41-17

- Environmental Consequences: pp. 166-67, 4.5.8: Cultural Resources

  Comment: LDA will work with the Trust to ensure that the design of the Digital Arts Center will be respectful of the Presidio's cultural and historical resources, while fulfilling LDA's operational needs. 41-18

We hope that these comments prove helpful in your preparation of the Final EIS.

Very truly yours,

Gordon Radley
President

Responses to Comments in Letter 41

41-1

Thank you for your letter. The text within the summary has been clarified to reflect the work of the proposed tenants at the digital arts center and the availability of open space to the public.

41-2

The text has been revised to reflect the public nature of the park.

41-3

The text has been modified to include a non-profit educational foundation to the list of proposed tenants.

41-4

The text and Table 1 have been revised to include a public restroom to the list of community and support services.

41-5

In response to the comment, the 30 surface parking spaces have been acknowledged and have been added to Section 2.5.5 and Table 1.

41-6

The text has been modified to as suggested to clarify the selected development team's responsibility to address onsite deficiencies to the water distribution system.

41-7

First bullet – The text has been modified to "develop marginal cost pricing incentives *for use of water beyond projected use allocations*."

Fifth bullet – The text has been modified to include the recommended additional water supply sources subject to additional analysis and agency review.

41-8

Comment noted.

41-9 AND 41-10

Financial participation in these improvements would be determined in the Letterman Complex Development Agreement between the Presidio Trust and the selected development team. The text has not been amended as recommended by the commentor.

41-11

Refer to master response 20.

41-12

The text has been revised to clarify who would be responsible for compliance with the applicable asbestos regulations.

41-13

The text has been revised to indicate who would be responsible for lead-based paint abatement.

41-14

The commentor is correct in suggesting that the contingency plan would apply to the 60-acre Letterman Complex (as well as to the rest of the Presidio). The text has been revised to reflect who would be responsible for development of the plan.

41-15

The text has been revised to correct the typographical error.

41-16

The text has been modified to address in greater detail how Alternative 5 would be consistent with the general objectives of the GMPA.

41-17

See master response 20 regarding parking. Revisions to parking numbers were made in the appropriate tables in Appendix D.

41-18

Comment noted. No response is necessary.

Letter 42

San Francisco Film Centre
39 Keyes Blvd
The Presidio
San Francisco, CA 94129

August 2, 1999

Mr. John Pelka
NEPA Coordinator
ATTN: Letterman Complex
Presidio Trust
34 Graham Street
San Francisco, CA 94129

Dear Mr. Pelka:

It is with pleasure that I write to strongly support the Letterman Digital Arts project at the Presidio.

My relationship with the Lucas companies goes back over twenty years when I worked as a licensee for a number of their films. When Mr. Lucas first moved here from Southern California I was impressed by his personal and professional commitment to the Bay area community. The Lucas companies have always set an exemplary community service standard.

As Skywalker Ranch was being built, I saw the respect and care that George Lucas has for the environment. I am confident that he will bring that same environmental stewardship to the Presidio.

When the Presidio was transferred from the military to the National Park Service I was Chief of Staff for then Assemblyman John Burton, who now serves as State Senate President. In that capacity I was involved in many aspects of the process and learned a great deal about the General Management Plan Amendment. I believe that the Letterman Digital Arts project goes a long way in fulfilling the requirements set forth in the GMPA for the Presidio to be used as a center for arts, education, research, communication, and global exchange. 42-1

Letterman Digital Arts, along with the San Francisco Film Centre and the Presidio Theatre, will create a unique community of film art and technology. The vision of the Lucas companies will enhance interaction in the Presidio community, provide environmental responsibility, and contribute to educational outreach. I am pleased to see that the Trust recognizes all of the benefits that come with this project.

Very truly yours,

Melanie Blum

Melanie Blum
Project Manager

Response to Comment in Letter 42

42-1

Thank you for your letter. The organization's support of the Letterman Digital Center is noted for the record.

Letter 43

LINDA F. DAVIS
Interim Superintendent

San Francisco Unified School District
135 Van Ness Avenue, San Francisco, CA 94102

PRESIDIO TRUST REC'D

P 2:47 PM

August 2, 1999

Letterman Complex
NEPA Compliance Coordinator
Presidio Trust
34 Graham Street
San Francisco, CA 94129-0052

Dear Coordinator:

The Letterman Digital Center, approved for development in the Presidio National Park, fulfills the goals set forth in the General Management plan to enhance the cultural and educational resources of the Presidio. The George Lucas Education Foundation, one of the tenants of the Letterman Digital Center, demonstrates the Lucas companies' commitment to excellence in education. The non-profit Foundation gathers and distributes information designed to improve public education and to involve the general public in helping the nation's schools.

To this end, the Foundation has created and distributed more than 27,000 copies of Live and Learn, a video and 300-page resource book, which promotes the kind of learning where all students are challenged and engaged, have access to interactive technologies, and are supported by inspired teachers, involved parents, and engaged communities. 43-1

The Foundation's work has been particularly useful in professional development, as universities, school districts, state departments of education and others use Live and Learn to prepare educators to teach in the "digital age".

The work of The George Lucas Educational Foundation portrays George Lucas' commitment to quality public education for all children.

Sincerely,

Linda Davis

Linda Davis
Interim Superintendent

Response to Comment in Letter 43

43-1

Thank you for your letter. The San Francisco Unified School District's support of the Letterman Digital Center is noted for the record.

Letter 44

AS YOU SOW * ECOLOGY CENTER
GOLDEN GATE AUDUBON SOCIETY
NATIONAL TRUST FOR HISTORIC PRESERVATION
NATIONAL PARKS AND CONSERVATION ASSOCIATION
NATURAL RESOURCES DEFENSE COUNCIL
SAN FRANCISCO LEAGUE OF CONSERVATION VOTERS
SAN FRANCISCO TOMORROW
SAN FRANCISCO TREE COUNCIL * SIERRA CLUB
THE WILDERNESS SOCIETY

Via Messenger

August 2, 1999

The Presidio Trust
c/o James Meadows, Executive Director
34 Graham Street, The Presidio
San Francisco CA 94129

PRESIDIO TRUST REC'D

Dear Members of The Presidio Trust:

Attached are the comments of the above-listed groups on the Draft Environmental Impact Statement for New Development and Uses within the Letterman Complex. We thank you in advance for your careful consideration of our views.

Sincerely,

Brian Huse
Pacific Regional Director
National Parks and Conservation Association

Johanna Wald, Director
Land Program
Natural Resources Defense Council

COMMENTS OF

**AS YOU SOW, ECOLOGY CENTER, GOLDEN GATE AUDUBON SOCIETY
NATIONAL TRUST FOR HISTORIC PRESERVATION,
NATIONAL PARKS AND CONSERVATION ASSOCIATION,
NATURAL RESOURCES DEFENSE COUNCIL,
SAN FRANCISCO LEAGUE OF CONSERVATION VOTERS,
SAN FRANCISCO TOMORROW, SIERRA CLUB and
THE WILDERNESS SOCIETY**

on

The Presidio Trust's

**DRAFT ENVIRONMENTAL IMPACT STATEMENT for
NEW DEVELOPMENT AND USES WITHIN THE LETTERMAN COMPLEX**

August 2, 1999

Prepared by:

Courtney Damkroger
National Trust for Historic Preservation

Brian Huse
National Parks and Conservation Association

Joshua Rider
Johanna Wald
Natural Resources Defense Council

INTRODUCTION

These are the comments of the National Parks and Conservation Association ("NPCA"), National Trust for Historic Preservation ("NTHP"), Natural Resources Defense Council ("NRDC"), San Francisco League of Conservation Voters, Sierra Club, The Wilderness Society ("TWS"), Golden Gate Audubon Society, San Francisco Tomorrow, San Francisco Tree Council, Ecology Center, and As You Sow on the Draft Environmental Impact Statement for New Development and Uses within the Letterman Complex (hereafter "DEIS"). The national organizations submitting these comments – NPCA, NRDC, NTHP, Sierra Club and TWS – have an extensive history of involvement with national parks generally and with the Presidio. The first four of these organizations were instrumental in the passage of the Presidio Trust Act while the fifth is currently a tenant in the Thoreau Center.

The organizations submitting these comments are committed to protecting the natural, cultural and historic resources of the Presidio through effective planning, partnership and fiscal responsibility. Individually and collectively, they are mindful of the unique management structure of the Presidio and, in particular, of the Presidio Trust's mandate for financial self-sufficiency. All of these organizations consider themselves friends of the Presidio. None of us want the Trust to fail and the unique place that is the Presidio lost. Nor do we want any of its nationally significant natural, cultural or historic values degraded or lost.

Our organizations also believe in and support the General Management Plan Amendment for the Presidio (hereafter "GMPA"), prepared by the National Park Service in 1994. We would be delighted if the Trust were, in fact, to carry out the vision embodied in that plan, although we recognize that its statutory mandate is merely to comply with the plan's "general objectives." (Presidio Trust Act §104(a) [Omnibus Parks and Public Lands Management Act of 1996, 16 U.S.C. §460bb note (1996)], hereafter "Trust Act.") Nonetheless, we recognize that circumstances have changed since the GMPA was completed, and we acknowledge that the Trust may feel the need to depart in some instances from the GMPA's specific provisions in connection with development of the Letterman Complex site as well as other land use decisions at the Presidio. Nevertheless, the Trust has provided no explanation for doing so other than its financial mandate, and in our minds, that reason, standing alone, is insufficient. This is particularly true when a complete financial plan has not been made public or included in the DEIS. 44-1

For these reasons and the problems noted below, this coalition of commenting groups believes that the Presidio Trust must supplement the DEIS before any development goes forward at the Letterman Complex site.

The Letterman decision has huge implications. Choices made here will set a precedent for all future planning decisions by the Trust. They will also determine, in large measure, how the public will be able to experience the park's resources and resource values in the

future. How these choices are made is every bit as important as the choices themselves, as the histories of other, older federal agencies, including the National Park Service, amply reveal.

As much as we want the Trust to succeed, we believe that the process that has been followed to date has taken a wrong turn. The clearest and simplest illustration of our conclusion involves the Trust's "preferred alternative." The Trust's preferred alternative – the Digital Arts Center (or Lucasfilm project) – is the option that, when compared to the others considered by the Trust:

- brings the most employees to the Presidio[1];
- provides the least housing[2];
- requires the second most parking under questionable assumptions[3];
- has the fewest public amenities[4];
- has the narrowest educational focus[5];
- is the least compatible with the Trust's own published guidelines[6]; and
- is the least compatible with the GMPA[7]

44-1

A process which produces this choice is, to our way of thinking, seriously flawed.

The specific flaws in the process followed to date involve both the Trust legislation and the National Environmental Policy Act ("NEPA") (42 U.S.C. §§ 4332 et seq.). All of these flaws undoubtedly stem first from the mandate for self-sufficiency that the 104th Congress imposed on the Presidio and the Presidio Trust. This mandate, however, is no excuse for failure to plan carefully and in compliance with important requirements for public participation and environmental review. Indeed, we believe that achieving self-sufficiency will require full compliance with all applicable requirements *as well as* open communication, candor and collaboration between the Trust, the National Park Service and all those individuals and organizations dedicated to protecting this remarkable park.

It is in that spirit that these comments are submitted.

I. SUMMARY

Based on an extensive review of the DEIS, we have concluded that the Trust has failed to comply with mandatory requirements of both its own legislation and NEPA. It has not complied with the GMPA in selecting candidates to develop the Letterman Complex site or with the GMPA objectives. The Trust has not provided the public with its own vision for the Presidio and the "objectives" it has adopted by resolution are not those of the GMPA. In

44-2

[1] DEIS, p. 14. Unless otherwise indicated, all page references are to the DEIS.
[2] *Id.*
[3] *Id.* at p. 15. For a discussion of these assumptions, see section VD2 below.
[4] *Id.* at p. 14.
[5] *Id.*.
[6] For a fuller discussion, see section IV below.
[7] For a fuller discussion, see section III below.

addition, those objectives were not developed with any public participation in contradition with the Trust's affirmative responsibility under the Trust Act. In contrast to the "objectives" of the Trust, its *Draft Planning Guidelines for New Development and Uses within The Letterman Complex* (hereafter "*Guidelines*") appear to be both substantively and procedurally sound: they further the GMPA vision far better than the "objectives" drafted by the Trust and, moreover, have been made available for public review and comment through inclusion in the DEIS – for which we commend the Trust. As indicated above, however, the preferred alternative falls far short of meeting the *Guidelines* and, although other alternatives come closer, none truly fit. As the result of this "mismatch" between the alternatives and the *Guidelines* as well as the Trust's failure to provide a publicly-stated vision, the choice of alternatives and, in particular, the choice of the preferred alternative, appears arbitrary.[8] 44-2

The NEPA problems posed by the document include: the lack of a clear relationship between this DEIS and the EIS on the GMPA to which it is supposedly tiered; the omission of key information, in particular the Trust's vision for the Park as a whole and its financial plan, as well as any discussion of the natural resources peculiar to the Letterman Complex site; an unduly truncated set of alternatives; an inadequate analysis of the direct impacts particularly in relation to visitor experience, the Park as a whole, parking, traffic, sewer, and water usage; the masking of impacts by reliance on nonmandatory mitigation plans and the *Guidelines*; and the failure of the cumulative impacts analysis to address the impacts of the Letterman Complex site development on the Park or the Golden Gate National Recreation Area (hereafter "GGNRA") as a whole. Last but not least, the Trust's actions with respect to selection of the preferred alternative and its decision to engage in "exclusive negotiations" with Lucasfilm have created – at best – the perception that NEPA's overarching goals have been disregarded and, at worst, that its requirements have been violated. 44-3

For these reasons, as examined in greater detail below, we believe that the DEIS is fundamentally inadequate in meeting the important purposes for which it was intended and must, therefore, be revised. A supplemental document must be provided for further public review and should be accompanied by: (1) a comprehensive management program for the Presidio; (2) detailed financial information on which the choices made were based; and (3) an analysis of how each alternative satisfies the *Guidelines*. 44-4

II. THE TRUST ACT

We are mindful of the Trust's obligations under the legislation that established the unique system for running the Presidio. The primary aspect of that legislation is, of course, the requirement of economic self-sufficency. (Trust Act, § 105(b).) This requirement seems foremost in the minds of Trust board members and staff as they have repeatedly stressed the need to move quickly in order to meet their financial obligations. The Trust has also recognized the requirement that its actions conform to 44-5

[8] As discussed below, the Trust's apparent intention to revise its preferred alternative to meet the guidelines during the NEPA process is also problematic.

the "general objectives" of the GMPA (id. §104(a)), although, as discussed below, we believe that this obligation is not being fulfilled.

Nevertheless, other obligations imposed by the Trust Act on the Trust seem to have been overlooked to date. One such obligation is the requirement for public comment and participation. Section 103(c)(6) of the Trust Act reads in part: "The Board shall establish procedures for providing public information and opportunities for public comment regarding policy, planning, and design issues." Yet the Trust has established the "general objectives" of the GMPA which are to bind it -- surely a policy decision -- with *no* opportunity for public input. Given that these are the only parts of the GMPA to which the Trust is bound by law, it is most important that the Trust both inform the public about and provide an opportunity for public participation in the process that defines these "general objectives."

44-5

Further, there is an obligation in the law for the Trust to adopt an overall plan that reflects its vision for the Park and its road to fulfilling the obligation of self-sufficiency. Section 104 of the Trust Act states: "The Trust shall develop a *comprehensive program* for management of those lands and facilities within the Presidio which are transferred to the administrative jurisdiction of the Trust." (Emphasis added). Surely, the adoption of such a program would constitute a major planning decision, yet the public remains uninformed as to whether the Trust has in fact adopted a comprehensive program. Nor has the opportunity been afforded to comment on any potential program under consideration. This is both a procedural and a substantive problem: the Trust must adopt such a plan and, in doing so, it must allow for public comment. Moreover, it seems clear that development of this comprehensive program should have preceded the initiation of decisionmaking for this major development proposal. Indeed, the lack of this program has major ramifications in the current decision process, particularly in that without it the public has no context for evaluating the various alternatives put forward for development of the Letterman Complex site.[9]

III. THE GMPA

The Presidio of San Francisco, one of America's great cultural and natural treasures, will soon be transformed from a military post into a national park unlike any other. It will pioneer a new role for a national park by creating a global center dedicated to addressing the world's most critical environmental, social, and cultural challenges.

44-6

The Presidio's new role symbolizes the swords-into-plowshares concept. At this site of incomparable beauty and history, we can link our military past with a future full of promise and possibility. The transformation is inspired by a newly emerging definition of protection - the one that recognizes that security is no longer based solely on political and military strength, but on stewardship of the world's human and physical resources through global cooperation.

[9] In addition, the absence of such a program raises the possibility of improper segmentation under NEPA. (See, e.g., 40 C.F.R. 1502.20, 1508.28.)

> *Long the guardian of the Golden Gate, the Presidio now stands ready to house a network of national and international organizations devoted to improving human and natural environments and addressing our common future. The site will be used as a working laboratory to create models of environmental sustainability that can be transferred to communities worldwide. Its inspirational setting will provide a respite for reflection and personal renewal.* (*Final General Management Plan Amendment – Presidio of San Francisco* p.v.)

These three paragraphs capture the result of a remarkable process that began in 1972 when Congressman Philip Burton had the foresight to envision a time when the Presidio would no longer be needed as a military base. Identified as surplus to the Army's needs in the Base Realignment and Closure Act (10 U.S.C. § 2687), the Presidio's future was already provided for under the legislation that created the GGNRA. (Act of October 27, 1972, 16 U.S.C. § 460bb (1994).) With the Presidio poised to become part of the GGNRA, the National Park Service, working closely with the public, local, state and national organizations, and the Congress, developed a comprehensive plan for the site. This document, the GMPA, set forth a bold vision for a new kind of park – "a global center dedicated to addressing the world's most critical environmental, social, and cultural challenges." (GMPA, p. v.) Our organizations fully support this plan and its vision for the park. 44-6

The plan is noteworthy for a number of reasons. First, the planning process was both inclusive and comprehensive. The public, interested organizations, government agencies and elected officials all participated in developing the guidelines, the vision, and several draft alternatives, all integral to forming the final document. (See, GMPA Appendix C: Public Involvement Summary, p. 124.) Second, the plan was built on a strong foundation that recognized the importance of maintaining the standards and values of the National Park System. Finally, and due in large part to the above, the plan's vision relies on the significant resources of the park to create an even higher park purpose that remains in keeping with national park standards.

A. The Vision of the GMPA

A universally shared vision is the essence of strategic planning and the foundation upon which a comprehensive plan is based. Not only does a clear vision allow planning to proceed in an integrated fashion, it also establishes a benchmark against which all decisions can be validated. That is, if an action does not contribute to the fulfillment of the vision, it must be viewed with skepticism and trigger further work to define an outcome more in keeping with the plan. 44-7

It is in this aspect of planning that the GMPA excels. Within the first 20 pages of the document can be found no less than ten specific references to the publicly supported vision of the Presidio as a sustainable community dedicated to understanding and solving critical environmental, social, and cultural challenges. This vision establishes the context for the

entire plan. Every proposed action, every planning concept, and each step of the implementation plan is filtered and refined by it. 44-7

B. Objectives Supporting the Vision of the GMPA

Just as the GMPA establishes a clear vision, it is also careful to define the overall objectives that, if achieved, will assure the fulfillment of the vision. Early in the document, these broad objectives are set forth:

- "The Presidio will be a dynamic setting for a network of institutions devoted to stimulating understanding of and action on the world's most critical social, cultural and environmental problems.
- "The Presidio will be home to an exciting array of visitor activities. Programs will inspire visitors to learn about the Presidio's military history, the diversity of peoples who have lived here, and its significant resources.
- "The Presidio's unparalleled collection of military architectural treasures and cultural landscapes will be preserved and enhanced. Its spectacular natural and recreational features will be perpetuated.
- "An environmentally responsible transportation strategy will be implemented to minimize private automobile use and increase the availability of public transit, pedestrian, and bicycle travel options. 44-8
- "The Presidio will be a lively and active community. The site will be used to create models of environmental sustainability, perfecting practices and technology that can be transferred to communities worldwide." (Plan Highlights, GMPA, p. viii.)

These objectives provide a clear picture of how the GMPA's vision for the Presidio can be achieved. In fact, the entire document is structured specifically to guide managers in a logical path to success. The plan itself, with its park-wide and planning area principles and concepts grounded in the fundamental vision and objectives framed by the document, is designed to guide every stage of the decision making process and speaks directly to the future planner.

In its entirety, the GMPA is a programmatic planning document. In addition to establishing a vision and objectives, the GMPA also defines appropriate uses for each planning area within the park. Of greatest interest for present purposes, the Letterman Complex was identified as a research and education facility and the main post was to house public and private organizations whose missions reflected the park's purpose. (GMPA, pp. 72-75.) While the GMPA recognizes that supplemental NEPA analysis will be required to implement individual components of the plan, it did not anticipate that the identified uses would be altered.

C. Moving Away from the GMPA's Vision

If it is the policy of the Trust to follow the GMPA, as Trust officials stated in a meeting with several of the groups submitting these comments on June 16, 1999, it is not at all clear how the development of the Letterman Complex as presented in the DEIS will serve that end. With the exception of Alternative 1, the Science and Education Center, the alternatives all represent radical departures from the GMPA vision.[10] The Trust is choosing to redefine what the GMPA says with respect to the Presidio's future.

This is best illustrated in the Trust's development of the "general objectives" of the GMPA. Page 6 of the DEIS remarkably states that the "general objectives of the GMPA are not precisely identified in the document itself; no list of 'general objectives' appears in the document." This statement can be interpreted as editorial slight of hand of the most disingenuous kind. Although the general objectives of the plan are clearly evident, and are set out in the list of plan "highlights" recounted above, the Trust is apparently relying on the mere absence of the words "general objectives" in the GMPA to invent its own.[11] 44-9

Vague at best, the new objectives afford planners maximum flexibility in land use decision-making and effectively gut the vision of the GMPA. The open nature of their wording lacks any central theme or thread necessary to convey a comprehensive vision. The GGNRA legislation, GMPA and the Presidio Trust Act were created in recognition of and as protection for the Presidio's significant historic, cultural and natural resources. Without doubt, the Presidio boasts unequalled natural and scenic beauty; yet, it is the Presidio's history as a military installation, dating to the Spanish and Mexican periods, that distinguishes it. The Trust's "objectives" do not in any way recognize the historic significance of this site. The addition of "where appropriate" to the first of the four "objectives" allows the Trust broad discretion in its responsibility to preserve and enhance the very resources that called for the GGNRA legislation in the first place. As a result of this maximum flexibility, we cannot know what the Presidio will become, nor can we effectively evaluate the options put before us by the Trust.

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[10] The other alternatives include: a Sustainable Urban Village (#2), a Mixed-Use Development (#3), a Live/Work Village (#4), and the aforementioned Digital Arts Center (#5). The sixth alternative was "No Action." (DEIS, pp. 11-48.)

[11] The objectives identified and adopted by the Trust are:

(1) To preserve and (where appropriate) enhance the cultural, natural, recreational, and scenic resources of the Presidio;

(2) To address the needs of Presidio visitors, tenants, and residents for community services such as transportation, water, power, waste management, and public safety (among others) in an environmentally responsible manner, while minimizing undesirable impacts on neighboring communities;

(3) To increase open space, consolidate developed space and provide for appropriate uses of the Presidio, particularly uses that involve stewardship and sustainability, cross-cultural and international cooperation, community service and restoration, health and scientific discovery, recreation, the arts, education, research, innovation and/or communication; and

(4) To sustain the Presidio indefinitely, both economically and physically, as a great urban national park. (DEIS, p.6.)

This fundamental problem is exacerbated by the fact that the identification of the new objectives was done without any notice to, review by, or opportunity to comment by the public, in direct contradiction of the Trust's legislative mandate as discussed above. Characterized on page 6 of the DEIS as an "exercise of its administrative discretion," the Trust staff and board have, in effect, vacated the public's own established vision and objectives and replaced it with something else. What, if any, vision the Trust now has for the Presidio cannot be discerned from their objectives. 44-9

D. The Letterman Alternatives

The selection of development alternatives for inclusion in the DEIS makes clear the Trust's need to redefine the GMPA vision. Following its own objectives, the Trust need only follow the broadest interpretation of the GMPA and has maximum flexibility in the selection of alternatives. In order to pay lip service to the GMPA, the DEIS shifts the analysis of the Letterman Complex alternatives from the GMPA's programmatic focus to analyses based on the quantitative details found in the GMPA.

The most striking example of this shift in focus is the discussion of the "preferred alternative." While the Digital Arts Center clearly reflects none of the GMPA's vision, the analysis describes the proposal as being in keeping with the GMPA because a single tenant will be engaged, to some extent, in research. As further evidence of the Digital Arts Center's asserted consistency with the GMPA, the DEIS points to: meeting square footage and height restrictions; removing both LAMC and LAIR; preserving scenic vistas; and the fact that new construction will be in keeping with the historic landmark district.[12] (DEIS, pp. 161-2) 44-10

In reality, none of the elements identified in the DEIS as being consistent with the GMPA relate at all to its vision either generally or for the Letterman Complex specifically. While the GMPA considers the Letterman Complex as a 60-acre whole, the DEIS, despite some allusions to the entirety of the site, is really a development plan for the 23-acre core, which features more new construction of a greater magnitude and density than was contemplated under the GMPA. What is more, while no alternative is closely consistent with the GMPA, the Digital Arts Center is arguably the most inconsistent -- in that it is the most private, least park like, completely lacks housing, and is the least devoted to finding solutions to global concerns. The Trust-established "general objectives" have led to development proposals which, if allowed to move forward, will reorient the entire Presidio toward an alternative vision – one that is not supported, understood, or even articulated to the public.

E. Repercussions of Inconsistent Planning

As we have stated in the past, both individually and collectively, our organizations are mindful of the Trust's requirement for financial self-sufficiency. This mandate certainly makes the agency's task more complex, particularly when it must be accomplished by 2013. 44-11

[12] As discussed below, several of these purported "consistencies" with the GMPA are illusory.

(Trust Act §105(b)) The proposals contained in the DEIS certainly reflect the urgency of the situation. If this document, however, is intended to give us confidence that the Trust can succeed, it has failed to do so. Absent from the DEIS is any evidence of how the Trust is making important choices that will not only serve its financial mandate, but also its responsibility to advance the purposes of the national park.

The public is left, therefore, with having to comment on a group of alternatives without any sense of how any one of them, including the preferred alternative, will interact with future decisions at the Presidio. This leaves many concerned reviewers with little to judge by other than the effects of various alternatives on their quality of life. Hence the support of many Presidio neighbors for the Digital Arts Center. This approach also allows the Trust almost unfettered flexibility in piecemeal development of the park. This strategy may prove effective for the Trust in the short run. But, as the Presidio begins to change in ways that were not originally understood, the public will become increasingly concerned. Without public support, the Trust will be unable to fulfill its responsibilities. 44-11

Without context, the alternatives stand out as simply another proposed development project. In a national park setting this is unsettling enough. But, as we articulate in the following sections, the lack of consistency with the GMPA also has led to significant flaws with respect to compliance with the National Environmental Policy Act.

F. The Trust Should Undertake to Amend the GMPA

The Trust has repeatedly stated that it intends to conform its actions to the GMPA. Yet as demonstrated above, the Trust's interpretation of the GMPA does not match the letter or the spirit of the document in its current form. If the Trust truly believes that the changes it has made to the vision of the GMPA are warranted, it should amend the document to present its current vision for the Park. This at least would allow the public the chance to understand, and participate in, the Trust's plans for the Presidio.

44-12

Amending the GMPA may be necessary regardless of the growing disjunction between its vision and that of the Trust, simply due to the changed circumstances since the GMPA was finalized in 1994. In the intervening five years, major circumstances affecting the Park and its environs have changed. The passage of the Trust legislation itself is not the least of these changes. This single act changed the managing authority of the Park, and also imposed the necessity for financial self-sufficiency. Surely, these changes warrant a re-examination of the roadmap for the Park's future. Furthermore, housing and traffic problems in the City of San Francisco have increased dramatically since the GMPA was finalized. Since the Presidio may play a key role in either exacerbating or alleviating these problems, it seems that a reconsideration of Park-wide planning is in order.

IV. THE PLANNING GUIDELINES

The Presidio Trust is to be commended for the both the quality of the work that is displayed in the *Planning Guidelines for the Letterman Complex* (published in the DEIS as Appendix B) and for providing interested members of the community the opportunity to comment upon them in their draft form. The Presidio project is, as the Park itself, unique, and the Trust's work involves the careful balancing of a great many factors. The *Guidelines* produced by the Trust represent a significant achievement in striking such a delicate balance. The participation of the public will, we believe, enhance, not inhibit, the Trust's achievement of its aims and goals and this is an obligation all of our groups take seriously.

There is a great deal to be admired in the draft *Guidelines*. Unfortunately, the Trust seems to have abandoned them in choosing its preferred alternative. The Digital Arts Center falls far short of the aims set in the *Guidelines*. While none of the other alternatives completely fall within the *Guidelines*, several come significantly closer than the Digital Arts Center, leaving the public to wonder what the other values were that made the Digital Arts Center the Trust's preferred alternative.

A short review of the substance of the draft *Guidelines* shows their strengths: the close ties to the vision adopted in the GMPA, the articulation of a framework for the Letterman Complex site that takes into account the impact on the wider park and on the visitor, and the sensitivity to the history and meaning of the area. The same overview reveals how far the preferred alternative, and indeed, the other options considered differ from the announced guidelines. 44-13

The Planning Guidelines "provide a planning and design framework for the entire range of actions expected in the 60-acre Letterman Complex...." (DEIS, p. B-1.) Unfortunately, the DEIS does not explain what the process will be for assuring that the alternatives comply with the Guidelines. In addition, the Guidelines were developed after the Letterman RFQ process. The respondents to the Letterman RFQ did not have the benefit of the Guidelines when designing their proposals. As a result, the public has no genuine opportunity to review the project alternatives against the goals of the Guidelines. So little detail is provided for each of the alternatives (materials, building elevations, detailed site plans, view corridors) that the reader has little basis on which to judge which or whether alternatives meet the goals of the Guidelines.

A. The Content of the *Guidelines*

The draft *Guidelines* set forth a well-thought out and complete framework for "the entire range of actions expected in the 60-acre Letterman Complex." (DEIS, p. B-1.) Included within the planning document are not just specific rules for building, but a broad and careful description of the larger context of the development, emphasizing not just the history of the site but overarching policy concerns associated with any new development. These overarching policies identified by the Presidio Trust in the *Guidelines* are: 44-14

- A National Park in an urban setting
- National and regional context
- National historic landmark district
- Models for sustainability (*Id.*)

It is these values, and the specific history and character of the Letterman site, that animate the planning guidelines in the specific areas of :

- Land Use and Public Access
- Pattern of Development
- Scenic Views
- Cultural and Natural Landscape
- Building Form
- Access, Circulation, and Parking

Each section begins with a brief introduction giving goals and direction for planning, and then details both broad design principles and specific guidelines for redevelopment of the site.

The Land Use design principles stress that the Letterman complex design should: "encourage[] and accommodate[] a wide range of uses, reinforcing the Presidio as a unique community in which to work, visit or live;" "integrate public access with private development;" and "encourage visitors and promote educational, interpretive, and recreational amenities." (DEIS, p. B-14.) Additional guidelines stress the importance of the visitor experience, emphasizing that the development should "showcase and interpret the history of the Letterman Complex and relate to other Presido themes and national park visitor experience." Recommendations include a Letterman visitor center, museum or walking tour. (Id.) 44-14

The Natural Landscape guidelines identify the significant natural components of the site including wildlife, the stands of mature tree scattered about the site, and the wildlife that these stands sustain. The guidelines emphasize the need "to protect, preserve, and enhance these natural features." (Id., p. B-19.)

The Cultural Landscape guidelines emphasize the history of the site, and encourage development to take its cues from that history. (Id., p. B-23.)

Scenic view guidelines call for the preservation and enhancement of scenic views and historic vistas both into and from the Letterman Complex. (Id., p. B-32.)

The guidelines for Building Form call for new construction to be compatible with the historic architecture of the site, while featuring design that will help model the Presidio's goal of sustainability. (Id., p. B-35.)

Finally, the guidelines for Access, Circulation and Parking stress the need for the future of the development to "decrease dependency on the automobile" and to "encourage alternative modes." The guidelines note that the Complex is "ideally suited to promote this

goal by enhancing pedestrian and bicycle connections, and improving transit access." Part of the strategy for this includes the promotion of a "strong jobs/housing balance." (DEIS, p. B-41). 44-14

B. The Strengths of the Draft *Guidelines*

There is much in the draft *Guidelines* to praise. The sensitivity to the Letterman Complex history, the visitor experience, the importance of modelling sustainability, and the recognition of the scenic, natural, and cultural resources of the site, make the *Planning Guidelines* an adequate baseline to insure that development of the Letterman site minimally respects the Presidio's role as a national park in an urban setting. The specific guidelines, while occasionally lacking detail,[13] attempt to integrate all the values that must go into any project chosen for this unique resource. Further, the planning guidelines recognize the importance of, and take their general shape from, the work done in planning for the Letterman Complex in the GMPA. Thus they consider the development of this site in the context of a larger vision for the park, both past and future. As the Trust has articulated, the GMPA should provide the basis for future actions at the park, yet the particular tenant anticipated for the Letterman Complex by the GMPA is no longer available. The *Guidelines* admirably provide a transition from a plan for a specific tenant to a framework that can accommodate a number of different uses without abandoning the core vision of the earlier GMPA. 44-15

The Trust also deserves praise for bringing the draft *Guidelines* before the public, so that they can appreciate the work done, evaluate and comment on their contents as contemplated by the Trust Act, and utilize their contents to evaluate the alternatives presented.

Unfortunately, little of the draft *Guidelines* survives in the Digital Arts Center proposal. Moreover, given the Digital Arts Center's substantial failures to meet the Trust's Guidelines, we cannot help but wonder what factors led to its selection as the preferred alternative.

C. The Digital Arts Center

The Lucasfilm project has little in common with the framework provided by the draft *Guidelines*.

44-16

The heart of the Digital Arts Center is a series of three four-story office buildings in a campus-like setting. These buildings would have generous setbacks from the site edges, and contain inner courtyard space larger than the remaining open space. (DEIS, p. 31.) The remaining seven acre open space would form a public park with a lagoon along the Gorgas

[13] One oversight is a lack of clear pictures of the views to be maintained into and out of the site. Also the relationship between building on the 23-acre parcel and the rest of the 60-acre Complex is under-explored. In addition, the "architectural characteristics" contain no discussion of building materials. (Cf., DEIS, p. B-0.) Sine much of the construction at this site is of wood, this fact should be acknowledged in the final guidelines.

Avenue edge of the development.[14] In addition to the "park," planned public amenities include a café, restrooms, coffee bar, and promenade. A digital effects archive would be open to scholars, while educational programs would train future digital effects workers (many of whom presumably would be employed in the office complex). In all, of the 900,000 sq. ft. of construction proposed, 840,000 would be given over to private office uses. A total of 1,500 parking spaces would be created in underground garages to accommodate the 2,500 employees at the site. (Id.) No housing is included in the plan, nor are there any activities associated with the past uses of the Letterman Complex or the rest of the park. The office campus is just that, a self-contained unit disconnected and different in purpose from the rest of the park. 44-16

How do the specifics of the plan match with the planning guidelines described above? There is little if any intersection. Compare the following:

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Planning Guidelines:	Digital Arts Center
"The key to successful redevelopment of the Letterman Complex lies in regaining this vitality by creating a diverse, lively, publicly accessible community. The Letterman Complex should incorporate a variety of resources and activities that serve employees, residents and visitors to the site and create a dynamic public setting appropriate to its stature as part of a national park." "encourage[] and accommodate[] a wide range of uses, reinforcing the Presidio as a unique community in which to work, visit or live;" "integrate public access with private development;" "encourage visitors and promote educational, interpretive, and recreational amenities." (*Guidelines*, p. B-14.)	"This alternative's concept is an office campus. . . ." (DEIS, p. 31.) Does not encourage or accommodate a wide range of uses. Does not encourage visitors.
For the Letterman Drive entryway, "public uses with a strong focus on education and interpretation of the area's historic, cultural and natural resources encouraged." (Id.)	Virtually none. There would be a "visitor entrance" to the building along Letterman Drive, "where a driveway and passenger drop off point would be located." (Id. at 33.)
Create a significant open area at the O'Reilly commons, to serve as the focus of	Aside from an 85 foot buffer, little to no significant open space. (Id. at 32.)

44-17

44-18

44-19

[14] We cannot help but note that the alternative describing the Digital Arts Center refers to this open space as a public park, as if the entire project were not already located within a National Park. (DEIS, pp. 31-2).

the site. (Id. at B-16.)		44-19
Gorgas Avenue edge to be the active, event-oriented, urban face of the park with recreational, retail, and cultural program uses. (Id.)	The Gorgas Avenue edge is a park, promenade, and lagoon. (Id. at 31.)	44-20
The development should "showcase and interpret the history of the Letterman Complex and relate to other Presido themes and national park visitor experience." Recommendations included a Letterman visitor center, museum or walking tour. (Id.)	None such.	44-21
Ground floor pedestrian amenities throughout the Complex, including retail, cultural, educational and visitor services. (Id. at B-17.)	Coffee bar, café, promenade, and restrooms for "visitors."[15] (Id. at 33.)	44-22
Create a network of open spaces throughout the Complex, accessible by pedestrians, and integrated into the site. (Id.)	Most of open space concentrated in courtyards which are not accessible to the public. A Great Lawn/park which is a discrete space not integrated to the rest of the site (much less the rest of the Presidio). (Id. at 31.)	44-23
Natural Landscape guidelines to preserve, protect, and enhance natural resources of the site. (Id. at B-19.)	Guidelines proposed as "mitigation" of project impacts. No enhancement of natural resources. (Id. at 39.)	44-24
Stormwater drainage to be directed to Tennessee Hollow or Crissy Field wetlands. (Id. at B-21.)	Stormwater drainage to the "lagoon." (Id. at 31.)	44-25
Fine grained development, emphasizing human scale design. (Id. at B-27)	Three large office buildings. (Id.)	44-26
"Development patterns reminiscent of a 'gated' community or exclusive campus are strongly discouraged." (Id.)	"[A]n office campus," with the majority of open space contained within private interior courtyards. The remainder is a separate lawn with little connection to the facilities. (Id.)	44-27
Conform to historic practice with water features: small courtyard fountains and surface runnels. (Id. at B-28.)	"Lagoon" feature as part of the "Great Lawn" or none. (Id.)	44-28
Scenic views to be preserved or enhanced both into and out of the site. (Id. at B-32.)	East-West views across O'Reilly Avenue blocked. Thornburg Avenue view corridor	44-29

[15] We note it is unlikely that the Digital Arts Center could meet the needs of its 2,500 employees without most of these facilities.

	blocked. No evaluation of views of the site from other areas of the Presidio. (*See*. Figure 9. DEIS at 32.) No visuals presented to aid reviewers in evaluating view impacts.	44-29
New construction to be compatible with the historic architecture of the site. (Id. at B-35.)	Without more fully developed design proposals and some visual aids (photographs, drawings, plans, elevations), it is virtually impossible to judge compatibility. It appears from the scant information given in the DEIS that the new construction may clash with the historic buildings throughout the Letterman site and particularly those across O'Reilly avenue. (Id.)	44-30
"Front Door" along Lombard Street to include "public zone." (Id. at B-16.)	Holds to street edge, but no public uses beyond dropoff point. (Id. at 33.)	44-31
Building to street edge of O'Reilly Commons with many pedestrian entryways into site. (Id. at B-37)	No O'Reilly Commons. Impenetrable edge blocking both views and pedestrian access to the site. No street level amenities. (Id.)	44-32
Gorgas Avenue edge to be sharply defined, urban and active. (Id.)	Gorgas avenue "edge" is amorphous, pastoral, and isolated.	44-33
Strong jobs/housing balance. (Id. at B-41.)	No housing at Letterman. 2,500 employees. (Id. at 14.)	44-34
Decrease dependency on automobile. (Id.)	Site primarily served by off site employees numbering 2,500. Construction of circa 1,500 parking spaces anticipated. (Id.)	44-35
Enhance linkages between the Letterman Complex, rest of the Presidio and possibly the rest of the City. (Id. at B-14.)	Linkages to city, Presidio as a whole and rest of Letterman site are weak.	44-36
Encourage new development to be compatible with the scale, architectural character and pedestrian-friendly quality of existing historic buildings.... (Id. at B-35.)	The lack of design information makes evaluation here extremely difficult if not impossible. The scale of the new construction does not appear to be in keeping with existing buildings.	44-37

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D. The Other Alternatives

This critique has focused, with good reason, on the Trust's announced preferred alternative: the Digital Arts Center. This focus should not mask discrepancies between the other alternatives and the draft *Guidelines*, none of which completely conform to the *Guidelines*, particularly as they concern the O'Reilly commons and scenic views. Still, most 44-38

of the other alternatives are superior to the Digital Arts Center at least in their mix of public and private facilities, in the educational facilities offered to the public, and in their integration into the wider park. Some, notably the Sustainable Urban Village (#2) and Live/Work village (#4) are also significantly better at achieving a strong jobs/housing balance.

Given this, it is natural to ask what guided the Trust's selection of its preferred alternative if not compatibility with its own guidelines for the Letterman Complex? The selection of the Digital Arts Center seems arbitrary if the factors to be considered were those presented in the *Guidelines*.

Indeed, given the failure of any of the alternatives to meet the *Guidelines*, the same criticism of arbitrary decisionmaking can be leveled at the selection of the entire set of alternatives and the rejection of other plans for the Letterman Complex site. As none of the plans comply with the *Guidelines*, what values made the four development proposals selected for consideration in the DEIS as alternatives separable from other responses to the Letterman RFQ? These values must be brought to light for public comment and discussion, to insure that the Trust is adequately and attentively carrying out its mandate.

In addition, there is a problem, discussed further below, in that there are hints throughout the DEIS that the "preferred alternative" will be changed to bring it in line with the draft *Guidelines* at some later point in this process. (See, e.g., DEIS, pp. 39-41.) While any modification of plans to move them toward compatibility with the well-thought out *Guidelines* would be welcome, these hints are problematic. They indicate that the public is not now being afforded the opportunity to comment on the "real proposals" as the proposals presented in the DEIS, and in particular the preferred alternative, will be changed significantly. This not only makes it impossible for the public to evaluate the proposals, but it also makes it equally impossible for the Trust to evaluate and respond to the public's comments since the alternatives commented upon are not those that the Trust will eventually consider. In addition to raising problems with NEPA compliance, this approach is inconsistent with the Trust's independent obligation under the Trust Act to consider public input, as discussed above. 44-38

Lastly, we question whether development of the Guidelines at this late stage may not lend an unfair advantage to the sponsor of the preferred alternative over others whose proposals were rejected earlier in the process.

For these reasons the commenting groups are gravely disappointed with the Trust's selection of the Digital Arts Center as its preferred alternative. We are, nevertheless, encouraged by the Trust's work with the National Park Service on the *Guidelines* and believe that these guidelines form the minimum basis for the development of the Letterman site. We urge the Trust to finalize the draft *Guidelines*, to commit to conforming to them in the future, and to recognize that the Digital Arts Center, at least in its present form, fails to meet these minimum standards.

V. NEPA

Our review of the DEIS reveals a number of serious NEPA deficiencies, including, but not limited to: an improper tiering to the earlier EIS for the GMPA; missing sections addressing the Trust's vision for the Park as a whole and its financial plan; a lack of any discussion of the natural resources peculiar to the Letterman Complex site; an unduly truncated set of alternatives; inadequate analysis of direct impacts on visitor experience, the Park as a whole, parking, traffic, sewer, and water usage; the masking of negative impacts by reliance on nonmandatory mitigation plans; and the lack of cumulative impact analysis on development of the Park or the GGNRA as a whole. In addition, as detailed below, and as previously indicated, we remain concerned that the Trust's decision-making process has violated the fundamental goal and requirements of NEPA. 44-39

A. The Relationship of DEIS to EIS on GMPA Is Unclear

According to the DEIS, its contents are tiered to the EIS on the GMPA. (DEIS, p. i.) While this may have been the authors' goal, it has not been achieved. First, the draft does not clearly identify the differences between the characteristics of all the alternatives under consideration and those allowed for under the GMPA. These differences include the fact that, in the earlier EIS and the GMPA, the Letterman Planning Area was identified as a 60-acre site and replacement construction was to be permitted anywhere within that area. Here, the site appears to be limited to 23 acres (although there are a number of confusing references to the larger area), the Trust's plans for the remainder are totally unknown.[16] Similarly, only one of the two buildings at the Letterman Complex was to have been torn down under the earlier EIS and plan, (GMPA EIS at 22; GMPA at 72), whereas both buildings would be torn down under most of the development proposals accepted by the Trust[17] and, as indicated, rebuilt within less than half the original acreage. (DEIS p. 3.) The total square footage of replacement construction has increased, and at least in the case of the preferred alternative, no housing is included. Not only does the draft fail to acknowledge such discrepancies, it provides no explanation for them even though they are clearly material and relevant to environmental impacts. 44-40

Second, the instant document should provide more, not less information about the specific resources of the project area than did the EIS on the GMPA since the activity being contemplated is a site-specific action. The description of the affected environment in the DEIS, however, says nothing about the area's natural resources. (Cf. DEIS, pp. 49-75.) It provides no information about the trees found there or the wildlife resources, including in particular, resident avian species that inhabit its trees. It says nothing about the hydrology of the area, and, in particular, drainage patterns from its watershed. (Id.) 44-41

[16] Does the Trust plan to permit additional building at the Letterman site? If so, for what purpose and under what circumstances? Alternatively, has it decided to bar additional building?

[17] Only the No Action (#6) and the Science and Education Center (#1) would retain one (#1) or both (#6) of the major buildings. (DEIS, p. 12.) These were among the first alternatives eliminated by the Trust, as discussed below.

Nor does the document address the potential for toxic materials on the Letterman site. Inasmuch as such information is not provided, it is hardly surprising that the document fails to analyze the impacts of the preferred alternative and others on these resources. 44-42

B. The DEIS Lacks Adequate Information

The information that the DEIS lacks includes both environmental information as indicated above and information about the Trust's financial, land use, and overall plans.

As discussed above, the preferred alternative as well as other alternatives do not fulfill the general or specific objectives of the GMPA. Although officials of the Trust stated in a private meeting on June 16, 1999 that, as a matter of policy, the Trust has decided to comply with the GMPA, no such statement is made in the DEIS. On the contrary, the draft states that the GMPA's land use concept may no longer be valid (DEIS, p. i) and plainly suggests that the only thing that the Trust intends to comply with is its own identified "objectives" which, as discussed above, do not constitute an overall plan or vision for the Presidio. The lack of such a plan is a critical omission of this document as is the lack of a financial plan.

Without an overall plan or vision, readers cannot evaluate how any of the development alternatives under consideration, including the preferred alternative, do – or do not – advance the Trust's overall goals and objectives. Similarly, in the absence of such a plan, readers cannot tell how the choice of any of the development alternatives will affect future development decisions. 44-43

Similar problems result from the lack of a financial plan. The Trust has said its decisions are based on financial necessity. Yet, its financial plan – with specific sources of revenues and financial projections – has not been given to the public. Without such a plan, members of the public cannot know what potential income sources have been considered.[18] Without such a plan, readers cannot tell how well the alternatives will – or will not – further the Trust's financial plan for the Presidio. Nor can we determine how the choice of any one of these options or even options overlooked or rejected by the Trust will affect the financial future of the Presidio and/or future development decisions. In short, because the DEIS presents neither financial nor overall plan information, readers simply are unable to evaluate fully the available options, including the preferred alternative. The failure to provide such basic, necessary information is a critical flaw in the document.

We are sincerely appreciative of the Board's commitment to providing the public with a fuller understanding of its view of the GMPA and its Financial Management Program, as expressed in Chairman Toby Rosenblatt's July 13, 1999 letter to Brian Huse, Pacific Regional

[18] For example, has the Trust considered charging for parking? Did it examine the possibility of convincing government agencies that rent office space in downtown San Francisco to relocate to the Letterman site? Were public facilities that could both entertain and educate explored? What about museums that need new space, such as the Academy of Sciences?

Director, National Parks and Conservation Association *et al.* However, that information will not be available until after closure of the comment period on this DEIS. Accordingly, it cannot be put to use in reviewing this document or its contents. As such, even if the information provided is not too little, it will definitely be too late to remedy this critical deficiency. 44-43

C. The DEIS' Alternatives Are Problematic

NEPA requires that a full range of alternatives be discussed (Greene County Planning Bd. v. Federal Power Com'n., 559 F.2d 1227 (2d Cir. 1976)), as well as that the final choice among them be postponed until after the EIS process is complete. (Public Service Co. of Colorado v. Andrus, 825 F.Supp. 1483 (D.Idaho. 1993).) This document is problematic in both respects. First, the number and range of alternatives has clearly been significantly truncated. Surely the Trust would never claim that it might select either Alternative 1 (Science and Education Center [Updated Presidio GMPA Alternative]) or Alternative 6 (No Action). As we have been reminded repeatedly, no proposal to carry out the GMPA was submitted to the Trust in response to the RFQ. Moreover, it seems inconceivable that the Trust would decide to do nothing at the Letterman Complex site. Indeed, according to the DEIS, "[f]undamentally, the Presidio Trust has determined that neither of these alternatives fulfills the Presidio Trust's statutory mission and responsibilities, after considering economic, environmental, technical and other factors." (DEIS, p. xiii.) At best, therefore, there are four alternatives under consideration.

These alternatives do not encompass the range of development options in this area. All four of the alternatives presented would occupy only 23 acres of the 60-acre Letterman area identified in the GMPA. None of them contemplate a lower density level. All of them also contemplate a 900,000 square foot development in the area. (DEIS, p. 12.) None of them address the question of whether a development of that size is wise – even with the unmistakably private and formidable presence such development will clearly produce. (Id., pp. 21-34). There is no reason that new development in this area must occupy 23 acres or match the existing square footage. Accordingly, alternatives that explored these issues are among the alternatives that should have been considered but were not.[19] In particular, since the RFQ specified that 900,000 square feet of building was required, a smaller option should have been considered along with one that contemplated spreading the density of development out more thoughtfully and sensitively. 44-44

In fact, however, there are not four alternatives under consideration: there are no more than two – and there may be only one. Two alternatives – Alternatives 2 (Sustainable Urban Village) and 3 (Mixed Use Development) – have already been publicly rejected by the Trust. In a May 3, 1999 press release, Trust Executive Director Meadows stated, "we have had the luxury of selecting two highly qualified teams from a strong field. If, for any reason, there are difficulties during our discussions with the two short listed teams, I am confident the Trust

[19] Other alternatives that should have been considered include those suggested by the Sierra Club Presidio Committee.

could enter into successful discussions with either of the remaining teams." (Emphasis added.) Further he said, only two of the four "merit a closer review if we are to select the plan that best meets the Trust's goals for the Letterman site…." These statements clearly indicate that – at least as of May – in the minds of the Trust, there were only two choices. Two options – even two options as different as the Digital Arts Center and the Live/Work Village (Alternatives 4 and 5) – do not constitute an adequate range of options under NEPA. In any case, newspaper articles and the Trust's own actions have allowed the public to believe that once the choice was made between the two "short listed" teams, it would be the final choice, as discussed below. 44-44

Then there are the problems, alluded to above, associated with statements in the DEIS to the effect that at least the final alternative will be adjusted to conform to the draft *Guidelines*. (DEIS, pp. 34-43.) As indicated above, none of the four development alternatives meet the *Guidelines*, the preferred alternative least of all. If the final choice is to be changed to meet the *Guidelines*, then these options are not after all the real alternatives and the final choice will be a *new* alternative that needs analysis under NEPA, together with public review and comment. In contrast, if the options are real, then they do not satisfy the *Guidelines* and, as discussed below, the impact analyses are inadequate.

D. The Analysis of Direct Impacts Is Inadequate

The DEIS' analysis of direct impacts is inadequate in two respects: first, some key assessments are simply not provided and second, other assessments are simply too superficial or problematic to qualify as the "hard look" that NEPA requires. (Marble Mountain Audubon Soc. v. Rice, 914 F.2d 179 (9th Cir., 1990).) In turn, these inadequacies are compounded by use of the *Guidelines* in such a way as to mask potential negative impacts.

1. Key assessments are lacking

The DEIS lacks any assessments of the impacts of the development proposals on other parts of the park, important natural resources of the Letterman Complex area, including, as indicated above, its trees and wildlife, or on the visitor experience. It also fails to provide an analysis of the visual impacts of these proposals as seen from any point within the Presidio or from outside – even though all of these resources will be affected significantly by the proposed development at the Letterman Complex. As the National Trust for Historic Preservation has written: 44-45

> Letterman occupies the most public location in the park. The site is highly visible and in most cases is the visitors' first impression of the park. Since the Lombard gate will remain the major entrance to the Presidio, we can assume that the majority of visitors will encounter the Letterman complex project first, which will set the tone for the Presidio. It is imperative that the development of this area of the Presidio reflects the openness and accessibility that is essential to a park of this stature.

(May 25, 1999 letter to Chair, Presidio Trust from Director, Western Office, National Trust for Historic Preservation.

Regrettably, despite attempts to accommodate public uses, the alternatives, and particularly the preferred alternative, are virtually certain to result in negative impacts to these key park attributes, in part because the Trust's own *Guidelines* were not adhered to in selecting them. In any event, since the Presidio is part of a national park visual impacts to its environs cannot be ignored. Moreover, since the Letterman Complex site is part of the Presidio National Historic Landmark District, visual impacts cannot be ignored. Yet, these impacts remain completely undiscussed in the DEIS. 44-45

2. Other important effects are treated superficially.

Three key issues raised by the development proposals accepted by the Trust including, in particular, the Digital Arts Center proposal are: 1) parking and traffic, 2) water and 3) sewer capacity. In the case of the latter two issues, the draft essentially says "the City will take care of this for us." (See DEIS, pp. 53, A-6.) More specifically, it asserts that the City will supply the needed water that cannot be obtained from Lobos Creek and that the Southeast Water Pollution Control Plant will handle the sewage. (Id., pp. A-6-A-7.) Neither of these assertions is substantiated and, in the case of the sewer facility, we have been unable – despite trying for several hours on several occasions – to find anyone there who will substantiate the statement that " treatment facilities operated by the [City] have sufficient wastewater treatment capacity to accommodate the estimated outflow." (Id., p. A-6.) What is more, in the case of both water and sewage, the quantities estimated are only for the Letterman Complex development, rather than the for the Presidio as a whole. The Letterman Complex is, of course, only one part of the Presidio and the Trust not only will be making decisions in the future that will have impacts on water and sewage, but has already made such decisions in connection with leasing other Presidio locations. These additive amounts should not be ignored and, in considering them, the analysis must take into account the fact that *already* serious water quality problems resulting from combined sewer overflows, stormwater and runoff exist and have necessitated numerous beach closures at the Presidio in the past year.[20] Last, but not least, non-quantified, non-mandatory water conservation measures certainly cannot be assumed to effectively mitigate excess water demands. (DEIS, pp. 35-6.) 44-46

The DEIS' treatment of parking and traffic suffers from even more problems. First, the document contains no explanation of how or why it decided to classify the Digital Arts Center as a research and development facility, rather than office use, which was the classification assigned several of the other alternatives, despite similar research/administrative mixes. (DEIS, p. D-3.) The distinction is not trivial since the former category is deemed to generate an 11.42 person-trip rate and the latter 18.10. If the office classification had been applied to the Lucasfilm project, the number of trips generated would have been 6,925 rather than the 4,360 presented in the DEIS. Similarly, the weekday PM peak hour traffic would rise from 400 vehicle trips to over 690. On its face, there seems to be no justification for using 44-47

[20] See, NRDC, Testing the Waters 1999—A Guide to Water Quality at Vacation Beaches (July 1999), pp. 42-3.

different trip generation rates for these projects. If there is, it must be supplied for public review and comment. 44-47

Second, the DEIS's explanation of how these trip generation rates were arrived at poses many questions, particularly in terms of the Digital Arts Center. For example, auto trips were calculated using an average vehicle occupancy of 1.4 persons per trip, yet this figure is based on a San Francisco Citywide Travel Behavior Survey. Even assuming that some of the Digital Arts Center's employees move into the City, of what relevance is this figure to those who are commuting from the North or East Bay? Similarly, using current geographic distributions of employee and visitor trips to and from the Presidio to predict the destinations of the future employees of the Digital Arts Center flies in the face of common sense. (See DEIS, pp. D-6). The Digital Arts Center is a relocation of several existing companies with employees, not a brand new project. Surely many of those employees will choose to commute to the new employment location. It is groundless to assume that their travel patterns will match those of employees currently working in the Presidio. Further, all the trip generation numbers used an average based upon the size (square footage) of the facilities and not the actual number of employees involved. The reasons for this must also be discussed. 44-48

Third, the DEIS does not explain how these trips both by vehicle and other modes of travel were converted into the 1500 parking spaces that will be housed in new garages at the Letterman Complex. If the estimated number of daily auto trips to the Letterman Complex that the Digital Arts Center will generate is really only 4,360 (DEIS, p. D-5) or even 6,120 (id., Table 14, p. 94), and the parking demand is 1,260 spaces (id.), why can't these cars be parked in existing parking spaces which total 13,000 according to the Final GMPA EIS? (GMPA EIS, pp. 126-27.) 44-49

On the other hand, if there are really going to be 4,360 or 6,120 trips per day, how can it be that only 400 cars will enter the Presidio at peak periods via all gates to go to the Letterman Complex? (See DEIS, Table D-7 at D-7.) Will the Trust prohibit employees of the Digital Arts Center from coming at peak periods? Will employees be required to come at assigned non-peak times? What about all the other vehicle traffic that will be coming to the Presidio at peak times? What in turn will be the effects on traffic outside the Presidio – *i. e.*, on Highway 101 and surface streets – if there is "a reconfigured intersection" at Gorgas Gate involving Richardson Avenue (id. at D-7), or even a "two-intersection configuration" there? (Id., p. 36.) What will be the air quality impacts of the latter configuration? The impacts on noise levels? Does the Trust have the authority to construct such an intersection? What will be the effects within and without the Presidio on air quality as well as on traffic, if the intersection is not reconfigured? 44-50

We note that the supply of parking to be built by the Digital Arts Center far exceeds the amount allocated to it by the Trust's own Transportation Demand Management Plan. (DEIS, p. 165.) Such an oversupply can only encourage automobile traffic. The proposed "mitigation" of monitoring seems both vague and wholly insufficient. (Id., p. 36.) 44-51

Finally, traffic flow will be reconfigured for the new development. A new Gorgas/Richardson exit will be added and the existing Gorgas/Richardson access routes reconfigured. The new Gorgas exit will be a primary departure point for the Letterman area and will cut extremely closely through the complex of historic industrial buildings (1170, 1160, 1152 and 1151). Impacts to these historic buildings and their users (YMCA for example) from this new source of traffic should be evaluated. 44-52

3. Impacts are masked by improper reliance on guidelines and mitigation plans.

While the DEIS reveals that the direct impacts of several of the proposals will be most severe, particularly as they concern water and traffic problems, the document attempts to mask these impacts through recitation of mitigation measures that it predicts "would reduce significant impacts on the resources . . . to less-than-significant level." (DEIS, p. 34.) Several of these mitigation plans promise only that the *Planning Guidelines* would be incorporated into the various proposals. For instance, the mitigation plan for impacts on cultural resources consists entirely of reference to the draft *Guidelines* (DEIS, p. 37), and the plan for mitigating impacts on scenic views is equally dependent on the *Guidelines*. Further, other mitigation measures are left for future development, including the storm water pollution prevention plan and the "detailed landscaping plan." (Id., pp. 36, 39.) There are several problems with this approach: most notably, the law is quite clear that mitigation measures, while they must be discussed in an EIS, need not be adopted by the agency.[21] Since we have no way of knowing which measures are – or will be – required by the Trust and, if so, in what form (e.g., will they be strengthened or weakened), their value for mitigation purposes is really problematic. 44-53

In addition, while many of the mitigation plans are absent, others are not quantified. For example, the DEIS refers (at p. 35) to a water conservation plan, no where is there any prediciton of how much water such measures will save or what will happen if this plan is unsuccessful. In the case of still other measures, it is sometimes difficult to discern exactly how they mitigate the problem.[22] Finally, the Trust depends at several times on mitigation measures that are beyond its power to implement such as planned changes to the intersections surrounding the Presidio, and the acquisition of water to make up for Lobos Creek shortfalls from the City. Such measures clearly cannot be counted on to minimize impacts. 44-54

D. The Cumulative Impact Analysis Is Inadequate

The site of the proposed development is within a national park, the Golden Gate National Recreation Area. Yet the DEIS lacks any assessment of the cumulative impacts of any proposal on this park as a whole. The same is true of the Presidio's status as a National Historic Landmark: the DEIS lacks any assessment of the cumulative impacts of the proposals on the Landmark status or qualities. In addition, the problem of masking cumulative impacts through reliance on mitigation plans and the draft *Guidelines* discussed above prevents 44-55

[21] Mitigation efforts are not mandatory under the law. See, e.g., Robertson v. Methow Valley Citizens Council, 490 U.S. 332 (1989).

[22] For instance, the Digital Arts Center includes the use of a "Webpage" to reduce parking demand.

cumulative impacts from being assessed. Thus, for example, the cumulative impacts of non-point pollution cannot be predicted when neither the storm water pollution prevention plan nor the landscaping plan that are supposed to minimize those impacts has yet to be developed. Lastly, because there is no comprehensive management program, the cumulative impacts of any of the alternatives under consideration on that program cannot be assessed. 44-55

E. The Concern That the Trust's Mind Is Made Up Is Not Trivial.

As we have indicated above, we are concerned that the Trust's actions with respect to selection of the preferred alternative and its decision to engage in "exclusive negotiations" with Lucasfilm in regards to the Digital Arts Center have created – at best – the perception that NEPA's overarching goals have been disregarded and, at worst, that its requirements have been violated. This concern is derived from the Trust's own actions, and failures to act, as discussed below.

Several of our organizations wrote the Trust on May 24, 1999, to express our concern that the final choice of the Letterman developer was about to be made, while the comment period on the DEIS was still open, in violation of fundamental NEPA requirements. That concern, we have since learned, was shared by the U.S. Environmental Protection Agency here in San Francisco. Our concern was based on a variety of sources, including but not limited to articles in the local press. For example, on April 20, 1999, an article by Dan Levy appeared in the *San Francisco Chronicle* which stated: "Yesterday, one month before the trust's board of directors is scheduled to pick a developer for the coveted 23-acre Letterman Hospital site, park officials were hit with a barrage of complaints from locals." On May 21, in announcing its editorial support for Alternative 4, the Live/Work Village, the *Chronicle* revealed its belief that there were only two competitors and stated that "this week … a federal panel selects a developer for the 23-acre Letterman" site. Again, on May 22, in an article headlined "Presidio Fight to the Finish," Dan Levy of the *Chronicle* said "[t]he plan that wins approval from the seven-member Presidio Trust board of directors on Thursday will set the tone for the character of the entire park…." Levy's article on May 29, referred to the "final round" again and to the competition as being between only two parties. 44-56

The coverage prior to the "final" choice in the *San Francisco Examiner* and other papers was similar. (See, e.g., *San Francisco Examiner*, "Decision on Presidio Developer Delayed," May 30, 1999; *Los Angeles Times* editorial, "Weighing Presidio's Fate," June 5, 1999.) And the initial articles after the selection of Digital Arts Center continued to treat the selection process as if it were all over, but for the details. (See, e.g., *San Francisco Chronicle* editorial, "A 'Star Wars' Winner for the Presidio Park," June 16, 1999; "Lucas Wins 'Presidio Wars,'" by Tyche Hendricks, *San Francisco Examiner*, June 15, 1999.

As far as we have been able to determine, the Trust made no effort to correct the impression given by these articles with the papers or their readers. Certainly, as far as we can tell, the Trust sent out no clarifying press releases and wrote no letters to the editors of these papers, explaining that the final choice was not being made, that only the preferred alternative was being selected and that the formal process for the public to comment on options for

development at the Letterman site was only just beginning. On the contrary, the Trust's own press releases mirrored these articles.

For example, the press release issued on March 24, 1999, stated that "[t]he Board ... [would be] deciding on a finalist in May" and quoted Executive Director Meadows as stating the "the Board is focusing on selecting the best plan for the Presidio." (Emphasis added.) No mention was made of NEPA, the prohibition on making a final decision in advance of completion of the NEPA process or the concept of a "preferred alternative." The press release issued on May 3, 1999 similarly referred to the Trust's "narrow[ing] focus" and stated that its "short list allows the Trust to ... ultimately, determine which proposal is the most appropriate for the Letterman site." (Emphasis added.) Again, Executive Director Meadows was quoted, this time saying, among other things, that "after a single finalist is determined," "the development agreement process begins...." Again, neither NEPA or any "preferred alternative" was mentioned. It was not until May 26, 1999, two days after six of the organizations submitting these comments sent the Trust via fax a letter highly critical of the process it was utilizing, that the first press release referring to "the preferred alternative" was issued. The May 26 press release, however, was extremely short (four sentences) and provided no definition or other information about that term or the process.

The Trust's June 14, 1999 press release announcing selection of Lucasfilm/Digital Arts Center did refer to it as "the preferred alternative" on several occasions and did explain that its choice "does not indicate a final land use decision by the Trust." At the same time, however, that press release simultaneously announced that "exclusive negotiations" would begin with Lucasfilm, to "ensure that [its] plans ... are well integrated into the entire 60-acre Letterman Complex and the Presidio as a whole." Indeed, the headline on the release was "Presidio Trust Selects Letterman Digital Arts for Exclusive Negotiations of Letterman Site." As such, this press release conveyed a mixed message at best – that Lucasfilm was the winner of the Letterman Complex sweepstakes and, at the same time, that the winner had not yet been declared. It did not help that, in announcing the extension of the comment period, the press release made no mention of the public confusion that the Trust knew existed over the nature and finality of its decision. On the contrary, rather than acknowledging that additional time was being provided because of "public confusion regarding the continuing viability of Alternatives 1, 2, 3, 4 and 6," as stated in the Federal Register notice announcing the extension of the comment period, (64 Fed. Reg. 32899-02, June 18, 1999), the Trust's press release merely said that the extension was being granted "to encourage additional input in the SEIS process." 44-56

What is more, it is clear that not only the public, but also the Trust was confused about the NEPA process and the relationship between the alternatives and the final choice among them, as the DEIS plainly reveals. As indicated above, the Trust never referred in its press releases or otherwise in the media to selection of a preferred alternative until a month after releasing the DEIS. Not only did the draft not identify a preferred option, it states that "[t]he preferred alternative will be identified over the other reasonable and feasible alternatives by the time the final supplemental environmental impact statement is filed...." (DEIS at xiii.)

Yet, as documented above, less than one week after the draft was released on April 27, the Trust was talking about narrowing its focus to two proposals and making its final choice.

For individuals and organizations trying to follow the process, the initiation of exclusive negotiations with Lucasfilm raises still more concerns. Here we have been told repeatedly that time is of the essence, and that 2013 is looming ahead. Consequently, the Trust must move as quickly as possible to finalize plans for Letterman. While entering into exclusive negotiations is consistent with this oft-expressed need for speed, this need certainly undermines any claim that the Trust feels free to reject Digital Arts Center at the end of the NEPA process, in favor of another alternative. If the situation requires negotiations to begin immediately, how can the Trust keep an open mind about the other options? If the situation requires exclusive negotiations to begin immediately, how will the Trust be able to justify starting over again with another alternative at the end of the NEPA process? If the Trust, in fact, is so concerned about moving ahead on Letterman now, then how can there be any meaningful role for the public in the "exclusive negotiations"? 44-56

None of these problems or concerns are alleviated by the Chairman's recent comments to the effect that the NEPA process with its preferred alternative and the exclusive negotiation process with Lucasfilm were "parallel but independent decision-making processes." Given the circumstances detailed above, this statement does not alleviate the problem that the negotiations are proceeding prior to close of the public comment period on the draft and the completion of the NEPA process.

F. The Trust Should Supplement the DEIS.

Given the problems noted above, the commenting groups believe that the Trust must undertake to further supplement the DEIS before any development can go forward at the Letterman Complex site. 44-57

CONCLUSION

These comments are offered in the spirit of support of the Trust's enormous responsibility. It is our sincere desire, as friends of the Presidio, to see this experiment succeed in not only becoming financially self-sufficient, but also preserving the standards and values for which this park was established.

The Presidio Trust's DEIS and its current plan for the Letterman Complex, the Digital Arts Center, are both gravely flawed. The DEIS is improperly tiered to the earlier EIS for the GMPA and is missing key information on the Trust's vision for the Park and its financial plan. In addition, it lacks site specific information for the Letterman Complex on wildlife, toxics and watersheds and fails to consider an adequate range of development alternatives. Finally, it contains questionable assumptions in regard to water usage, parking, and traffic problems, and relies on nonmandatory mitigation measures to mask significant negative impacts. 44-58

Responses to Comments in Letter 44

44-1

The Trust recognizes the long-term commitment of the commenting organizations to the protection of the natural, cultural and historical resources of the Presidio, appreciates the opportunity to have opened up a working dialogue with these groups, and welcomes the opportunity to continue to work with these and various other organizations towards those goals. For the reasons referenced below, however, in response to the specific comments of the commenting organizations, the Trust disagrees with the conclusion that the Draft EIS must be supplemented.

We start by noting that a number of issues raised in the letter are important ones also raised by others, which the Trust has addressed generically in master responses. For a response to the comment concerning the Trust's compliance with the Trust Act and NEPA, refer to master responses 1A and 1B; concerning the adequacy of the Trust's public involvement process, refer to master response 1E; concerning the Trust's compliance with and apparent departure from the GMPA and compatibility of the preferred alternative with the GMPA, refer to master response 2A; and concerning the public availability of the Trust's financial plan and assumptions, refer to master response 5.

In the commentors' opinion, the Trust's selection of the Digital Arts Center (DAC) as the preferred alternative is a seriously flawed choice based upon seven distinct conclusions. The commentors' seven conclusions are in most instances subject to interpretation that is not shared by the Trust or uniformly by other commentors. The Trust will respond briefly to each of the seven asserted conclusions:

1) The assertion concerning number of employees is true as noted in Table 1 (2,500 employees versus the average of 1,700 employees for Alternatives 2, 3, and 4).

2) With respect to housing, while Alternatives 2 and 4 provided onsite housing, housing was not required or requested as part of the project nor was it previously envisioned for the site in the GMPA. More than half of Alternative 5's demand for housing would be met elsewhere within existing housing stock at the Presidio.

3) While the commentors are correct that the DAC has the second largest amount of parking, tenants under any alternative would be required to participate in TDM programs to reduce parking demand and meet Presidio-wide performance targets.

4) With respect to public amenities, of all the alternatives, Alternative 5 may provide the most public amenities given that almost one-third of the 23-acre site would be devoted to a public park, a substantial increase as compared to the existing site conditions, and the future ability of the DAC proponent to provide continuing park interpretive and support services.

5) The opinion that the DAC involves the "narrowest education focus" is noted for the record but is not shared by the Trust or other commentors, specifically the San Francisco Unified School District (letter 43), the American Association for the Advancement of Science (letter 63), or the California Department of Education (letter 64). The preferred alternative includes an archive related to the digital arts and an institute offering a digital arts training program. Both the archives and the educational institute would provide educational programs, including outreach to a diverse community, introducing schools and students to emerging multi-media.

6) Concerning compatibility with the Planning Guidelines, the record as documented in the EIS shows that the preferred alternative is largely consistent with the Planning Guidelines. These Guidelines are intended to be a continuing interactive set of guides that will be incorporated into the Design Guidelines and applied through the design review process and consultation under the Programmatic Agreement involving the continued scrutiny by the ACHP, the SHPO, NPS, and the public.

7) Finally, with respect to compatibility with the GMPA, the preferred alternative is fundamentally consistent with and fairly approximates the development allowed in the GMPA, which anticipated that a scientific research and education user would occupy the site as an anchor tenant. The developments are equivalent in many ways, including the public access aspects, the research and education components, the extent of open space (with the preferred alternative actually increasing open space), and the absence of a housing component.

The Trust has addressed the commentors' seven conclusions individually, but as the commentors note, a process has produced the Trust's choice, and the Trust believes that the commentors view the relevant criteria under the decision-making process too narrowly. In selecting the DAC as its preferred alternative, the Trust has considered not only the analysis of the seven criteria noted, but also the record of the EIS as a whole and factors not mentioned by the commentors such as the Trust Act's self-sufficiency mandate, its directive to give primary emphasis in tenant selection to those that enhance the financial viability of the Presidio, and the suitability of this site as compared to others under the GMPA for intensive development. The Trust, having considered and weighed all relevant decision-making criteria, selected the DAC as the preferred alternative because in its judgment, the alternative will best meet the Presidio Trust's mission, goals, and objectives.

44-2

For response to comments concerning the Trust's compliance with the Trust Act and NEPA generally, refer to master responses 1A and 1B; concerning conformity with the GMPA in the selection of candidates, refer to master responses 2A and 6A; concerning the Trust's identification of and compliance with the general objectives of the GMPA, refer to master responses 3A, 3B, and 3C; concerning the need for a comprehensive plan, refer to master response 4A; and concerning the consistency of alternatives with the Trust's Planning Guidelines, refer to master response 7A.

44-3

The issues raised in this comment are addressed in greater detail in comments 44-5 through 44-57. Please refer to the corresponding responses for a detailed discussion.

44-4

The comments in this introductory paragraph are addressed in master responses 4A, 5, 10A, and 10B. Also, please see master responses 6A and 7A.

44-5

For response to the comment concerning the process for identifying and conformity with the General Objectives of the GMPA, refer to master responses 3A, 3B, and 3C; concerning the need to develop a comprehensive plan before proceeding with the proposed project, refer to master response 4A. For response to the comment in footnote 9 concerning improper segmentation under NEPA, refer to master response 1D. Also, please see master responses 1A and 7B.

44-6

The comment is noted for the record.

44-7

The comment is noted for the record. For response to the comment concerning the conformity of the Trust's decisions with the GMPA, refer to master response 2A.

44-8

The comment is noted for the record. For response to the comment concerning the alteration of the GMPA's identified use, refer to Section 1.2 (Purpose and Need) of the Final EIS.

44-9

For response to the comment concerning departure from the GMPA, refer to master responses 2A and 4A, and Section 1.2 of the Final EIS; and concerning the Trust's identification of and compliance with the General Objectives of the GMPA, refer to master responses 3A, 3B, and 3C.

44-10

For response to the comment concerning the consistency of the Trust's actions with the GMPA and its "vision," refer to master response 2A; and concerning the General Objectives of the GMPA, refer to master responses 3A and 3B. We also note that other commentors have asserted that the Digital Arts Center embodies the vision of the GMPA (see letters 29, 30, 31, 34, 35, 37, 50, 51, 52, 63, and 64).

44-11

For response to the comment concerning the context in which to evaluate the preferred alternative and concerns with piecemeal development, refer to master response 4A.

44-12

For response to the comment concerning the Trust's interpretation of the GMPA and a need to amend the GMPA, refer to master responses 2A and 2B; concerning the need for certain additional park-wide planning, refer to master response 4A.

44-13

Please refer to master response 7A with regard to a discussion on the purpose of the Planning Guidelines and how each alternative complies with them. Text has been added in the Environmental Consequences, Cultural Resource section of each alternative to further detail inconsistencies between site plans and Planning Guidelines. Please refer to Section 1.4 of the Final EIS and master response 7B for a discussion of the future design review process.

The RFQ process was separate from but related to the Letterman Complex EIS process. The respondents to the RFQ process did not have Planning Guidelines to work from. The RFQ stage focussed on identifying applicants' demonstrated qualifications for successfully completing and operating the proposed project, and Planning Guidelines were not considered necessary at this initial stage. Following the RFQ stage, the Trust developed a draft set of Planning Guidelines for the Letterman Complex concurrently with the Request for Proposals (RFP) stage of the selection process. All teams who were selected to respond to the RFP did so with the same information about the Planning Guidelines, which were under development. Information was provided to each of the teams on almost a weekly basis as the Guidelines were developed. The Planning Guidelines, to be complemented by design guidelines, remain relevant for the duration of the design development and review process, a process that begins once the EIS process is completed.

44-14

Comment noted. The Presidio Trust appreciates the commentor's perspective of key points of the Planning Guidelines, which do not, however, purport to reflect the full content of the Guidelines.

44-15

It is the Presidio Trust's opinion, as documented in the EIS, that the preferred alternative is largely consistent with the Planning Guidelines. The text of Sections 4.1.8 through 4.6.8 (Cultural Resources) of the Final EIS has been expanded to address in further detail inconsistencies between the alternatives and the Planning Guidelines. Future

planning and design review processes would strive for greater compliance with the Planning Guidelines to reduce these effects (please refer to mitigation measure CR-1, *Planning and Design Guidelines*, and to master response 7B; also, see master response 7A for discussion about the Planning Guidelines). With regard to the identification of Alternative 5 as the preferred alternative, please see Section 2.1, Development of Alternatives, of the Final EIS, where text has been expanded to further describe this process.

44-16

In response to the two substantive comments made, the preferred alternative must be seen in the context of the 23 acres it occupies together with the activities on the other 37 acres of the Letterman Complex, and consideration must be given to the proposal to set aside almost one-third of the 23 acres as a public park to which the public is invited. Master response 7A discusses the ways in which the preferred alternative is consistent with the Planning Guidelines. It is consistent with the GMPA in that no housing is proposed for construction within the Letterman Complex; rather, the housing needs generated through the new uses at the Letterman Complex would be accommodated elsewhere, within existing housing stock at the Presidio. There is no requirement that new uses at the Letterman Complex be associated with past uses of the Letterman Complex. However, text has been added to the Final EIS within the description of alternatives that outlines the activities and programs that would be carried out, including interpretation about the site's history.

44-17

The Planning Guidelines provide a framework for planning for the entire 60-acre complex, not just the 23-acre site of development proposed under Alternative 5. Excerpted text from the Planning Guidelines in this comment would apply to the entire complex. Additional text has been added to the Final EIS to describe and analyze the effects on the visitor experience for the Letterman Complex undertaking, including the preferred alternative. Please refer to master responses 7A and 25.

44-18

Additional text has been added to Section 2.7 of the Final EIS to describe in more detail the public-oriented uses under Alternative 5 that are accessible from the Letterman Drive entryway. The main visitor lobby, accessed from Letterman Drive, would include interpretive materials related to the Letterman Complex history. Screening and meeting rooms would be located near this entrance which would periodically be made available to the public. Please refer to master response 25 for further discussion.

44-19

Alternative 5 includes the creation of a significant new open space, a 7-acre Great Lawn, within the Letterman Complex. The details of the O'Reilly Avenue commons and the Great Lawn would be developed in the design phase of the project (see master response 25).

44-20

Alternative 5 proposes built facilities along the Gorgas Avenue streetscape that include a public café as well as common facilities, in addition to the Great Lawn where activities and events could occur. This fulfills the Planning Guideline's objective for an active, event-oriented edge with recreational, retail, and cultural program uses (see master response 25).

44-21

Master response 25 addresses this topic. Also, text has been added to the Final EIS to describe the visitor experience at the Letterman Complex for each of the alternatives. Text has also been added to the Affected Environment of the Final EIS to describe current plans and activities underway for Presidio-wide interpretation. In addition to programs and activities brought forward by tenants, the NPS is responsible, per the Presidio Trust Act, to provide interpretive

services for the Presidio in cooperation with the Presidio Trust and would be engaged in developing programs for the Letterman Complex.

44-22

Comment noted. Please refer to master response 25.

44-23

The Presidio Trust disagrees with the assertion that most of the open space in Alternative 5 is concentrated in courtyards. Alternative 5 provides for 15 acres of open space, of which the largest area would be a 7-acre Great Lawn open and accessible to the public from the east (a new pedestrian entrance from Chestnut Street), from the south through two passages between the buildings, as well as from the north edge. In addition, an open space buffer is retained along the south edge of the 23-acre site, near Letterman Drive as well as the O'Reilly Avenue commons. These public, open spaces, in addition to the enclosed courtyards are consistent with the Planning Guidelines' recommendation for a network of open spaces throughout the complex as well as for "buildings clustered around courtyards and intimate outdoor spaces" (Appendix B, 3.5.2D).

44-24

Refer to master response 16.

44-25

Refer to master response 15.

44-26

The proposed buildings in Alternative 5 would be of varying height and scale to avoid a sense of "blockiness." Additional text has been added to the Environmental Consequences section for Alternative 5 to address the inconsistencies between the alternative and the Planning Guidelines. Please refer to master response 23. The design review process would further address this concern through the application of Planning Guidelines and subsequent Design Guidelines for new construction to address issues of massing, scale, and orientation. Please refer to master response 7A and response to comment 33-6.

44-27

The Trust disagrees with the commentors' assertions. Please refer to response to comment 44-23.

44-28

For clarification, the excerpted Planning Guidelines text refers to the section to "Consider the character of historic water features – small interior courtyard fountains and the surface runnels – in the design of new water features." Alternative 5 proposes the development of a lagoon at the northeast corner of the site, where historically there once was a tidal marsh area. The lagoon is a historical symbol or reminder of the past land use of this site. Furthermore, this design feature would fulfill sustainability goals for the site through onsite management of storm water. Attention to additional water features, such as the use of fountains and historic runnels, would be addressed in the future during conceptual plan refinement and design development. Also, it should be noted that the Planning Guidelines are applicable to the entire 60-acre Letterman Complex and rehabilitation and reuse of the historic runnels may be more successfully accomplished elsewhere within the complex, subject to additional analysis.

44-29

Please refer to master responses 23 and 24 for a discussion on effects on the historic setting and views. In the Final EIS, additional analysis has been provided for each alternative for visual impacts. The analysis is supplemented by Figures 20 through 24 that illustrate topics covered in the new text and to aid reviewers in evaluating view impacts.

44-30

See master responses 7A, 23, and 24.

44-31

The site plan for Alternative 5 proposes preservation of the open landscaped space at the south edge of the 23-acre site, near Letterman Drive. In addition, the site plan designates the south edges of the built complex to be the arrival/drop off and visitor area, with most of the public amenities located along the Great Lawn's building faces, which would be consistent with the intent of the Planning Guidelines. Refinement of building uses, and their specific location within the 900,000-square-foot footprint would occur during the design development phase.

44-32

A discussion of the preferred alternative's impact on the O'Reilly Avenue edge can be found in master response 23. Additional text has been added to Section 4.5.8.1 explaining that the "impenetrable" edge along O'Reilly Avenue would be a subject of ongoing negotiations during the design development and review process to avoid this adverse effect on the adjacent historic structures. The Planning Guidelines would be applied through consultation under the Programmatic Agreement and the design review process, which would involve input from the ACHP, the SHPO, NPS, and the public.

44-33

Please see response to comment 44-20. The Presidio Trust disagrees with the assertion that Gorgas Avenue would be an amorphous, pastoral edge.

44-34

The reference to jobs/housing balance in the Planning Guidelines is in the context of design principles for access, circulation, and parking. Currently, 1,304 units of housing are available elsewhere at the Presidio, a portion of which would be used to accommodate employees of a Digital Arts Center. It should be noted that neither the Army nor the UCSF proposal had housing on the 23 acres.

44-35

The Digital Arts Center would be required to fully participate in an active TDM program which would include mitigation monitoring and other measures specified in mitigation measure TR-8 that are designed to reduce usage of automobiles at the Letterman Complex (see master response 20).

44-36

The Presidio Trust disagrees with the assertion that linkages to the Presidio and rest of the Letterman Complex are weak (see master response 25).

44-37

Please refer to mitigation measure CR-1, *Planning and Design Guidelines*, and master response 7B. Elements of architectural scale, massing, orientation, and color would be addressed in the design development process for this undertaking. New construction would be sited and designed to reinforce historic patterns of development on the site and would be more compatible with the historic setting in scale and massing than the existing LAMC and LAIR facilities.

44-38

For response to the comment concerning the conformity of alternatives to the Planning Guidelines and the effect of bringing the proposals into conformity with the Planning Guidelines, refer to master responses 7A and 7B. For response to the comment concerning the scope of alternatives, refer to master response 6A, and concerning identification of the preferred alternative, refer to Section 2.1.3 of the Final EIS.

44-39

For a response to the comment concerning the Trust's tiering to the GMPA EIS, refer to master response 1D; concerning missing sections addressing the Trust's vision for the park as a whole and its financial plan, refer to master responses 4A and 5; concerning a lack of any discussion of the natural resources at the site, refer to master response 16; concerning the range of alternatives, refer to master response 6A; refer to master responses 24, 4B, 20, 18, 14 and 13 regarding the analysis of impacts on the visitor experience, the park as a whole, parking, traffic, sewer and water usage, respectively; regarding the reliance on mitigation measures, refer to master response 12; concerning the cumulative impact analysis, refer to master response 4B; and concerning the Trust's decision-making process and its requirements under NEPA, refer to master response 1B.

44-40

Please refer to master response 1D, and to Section 1.2, Underlying Purpose and Need within the Final EIS. For further response to comment concerning the 23- versus 60-acre site and for response to comment in footnote 16, refer to master response 4A. See also master response 6A.

44-41

Concerning information on trees, wildlife resources and birds, refer to master response 16. Concerning the hydrology of the area and drainage patterns, refer to master response 15.

44-42

The commentors are referred to Section Y, Human Health, Safety and the Environment in Appendix A of the EIS for an analysis of the impacts related to the cleanup of hazardous substances, pollutants, and contaminants at the 23-acre site. The analysis identified mitigation measures, including asbestos remediation, lead-based paint abatement and contingency planning, that would be imposed upon the project to reduce impacts due to potential contamination at the site. Those measures appear in the main body (Section 4.7) of the EIS.

44-43

For response to the comment concerning the Trust's compliance with the GMPA and the need for a comprehensive plan for the Presidio, refer to master responses 2A, 3B, and 4A; and concerning the public availability of the Trust's financial plan and assumptions, refer to master responses 5, 10A, and 10B.

44-44

For response to the comment concerning the adequacy of the range of alternatives considered by the Trust, refer to master response 6A (see also Sections 2.1 and 2.2 of the EIS). For response to comment concerning conformance of the alternatives to meet the Planning Guidelines, refer to master response 7A.

The Trust had a number of rational bases for focusing its development alternatives to 900,000 square feet on the 23-acre site. Please refer to master response 6A and Section 1.2 of the Final EIS, where text has been expanded on these issues.

It is not accurate to say that none of the alternatives contemplate a lower density level on the 23-acre site. In fact, Alternative 1, which proposes spreading the 503,000 square feet of building density throughout the 60-acre complex, is included and analyzed as one of six alternatives. This alternative provides an important baseline to show the effects of spreading the density across the complex as compared to retaining the entire development within the 23-acre site.

For response to comment on confusing press statements concerning the selection of alternatives, refer to master response 6B.

44-45

The Presidio Trust disagrees with the commentors' opinion that key assessments in the EIS are lacking. For discussion of the assessments of impacts on other parts of the park, refer to the cumulative impacts analyses provided for each alternative in Sections 4.1.11 through 4.6.11 of the Final EIS and to master response 4B. Concerning an assessment of project impacts on natural resources including trees and wildlife, refer to master response 16. Concerning an assessment of project impacts on the visitor experience, refer to master response 25. Concerning an assessment of visual impacts, refer to master response 25.

44-46

With regard to parking and traffic issues, refer to responses to comments 44-47 through 44-52, below. Regarding water and sewer capacity issues, refer to master responses 13 and 14, respectively.

44-47

The land use associated with Letterman Digital Arts was considered to be "research and development" because the proposed number of employees compared with the proposed square feet of replacement construction is consistent with the employee densities typically noted for research and development facilities. The *ITE Trip Generation Manual* (Institution of Transportation Engineers 1991 and 1997) indicates an average employee density of 342 square feet per employee for research and development uses, and between 301 and 313 square feet for various types of office uses. Because Letterman Digital Arts proposes a total of 2,500 employees for the 900,000 square feet of facilities, the average employee density of 360 square feet per employee is more consistent with the lower density typically found for research and development facilities than for office space.

44-48

The average vehicle occupancy of 1.4 persons per vehicle, as obtained from the Citywide Travel Behavior Survey, is for San Francisco Superdistrict 2. Superdistricts are travel analysis zones established by the Metropolitan Transportation Commission (MTC) and provide a basis for geographic subareas in the City of San Francisco. Superdistrict 2 is generally bounded by the Pacific Ocean, Golden Gate Park, Van Ness Avenue, Townsend Street, and the Marina.

The average vehicle occupancy of 1.4 persons per vehicle is for all trips destined to or leaving Superdistrict 2, and accounts for trips that originate and end within San Francisco, as well as in the North Bay, South Bay, East Bay and other out of the Bay Area origins (and not just those with a San Francisco origin or destination).

44-49

An explanation of parking demand was contained in Appendix D in the Draft EIS. Also, see master response 20. Parking for the proposed development could not be accommodated in existing spaces because, even though there are currently 13,000 spaces in the Presidio overall, only 585 vacant spaces are located on the 23-acre site and parking on adjacent sites is very limited. Also note that although the park currently has 13,000 parking spaces, the GMPA calls for a reduction to approximately 8,400 spaces.

44-50

Typically, offices and research and development centers generate peak-hour traffic volumes that are approximately 10 percent of the total daily traffic generated, as illustrated in Table D-1 on page D-3. Because many of the trips generated by employment centers are visitor trips, a large proportion of trips do not occur during the peak commute periods. In addition, employee-generated traffic is generally distributed over a 2-hour peak period. In order to provide a conservative analysis of traffic conditions, the peak hours of the 2-hour peak periods were evaluated for the EIS. The traffic volumes shown in Table D-3 on page D-5 correspond to estimated traffic during the p.m. peak hour, and not the p.m. peak period.

Traffic that would be traveling to and from other parts of the Presidio was incorporated into the traffic impact analysis. Traffic that is currently traveling to and from other parts of the Presidio is accounted for in the traffic counts conducted in January 1999. Traffic that is forecasted to be traveling to and from other parts of the Presidio in the future was estimated in the GMPA EIS. The future intersection traffic volumes assumed in the Draft EIS were based on the sum of these forecasted traffic volumes as well as traffic that would be traveling to and from the 23-acre site.

The levels of service shown in Table 18 of the Final EIS reflect year 2010 conditions and consider the traffic traveling to and from the 23-acre site, traffic traveling to and from other parts of the Presidio, and traffic traveling through these intersections to other destinations outside the Presidio.

The Presidio Trust would need approval from Caltrans to construct the proposed intersections on Richardson Avenue. If these intersections were not constructed, the project-related impacts at other Presidio gates (primarily the Lombard Street Gate) would be substantially greater.

44-51

See master response 20.

44-52

With regard to impacts on the historic buildings and streetscapes, the effects of proposed intersection improvements on the historic setting are analyzed in Sections 4.1.8.3, 4.2.8.5 through 4.5.8.5, and 4.6.8.3 of the EIS. Additional text has been included to address these concerns raised. In addition, please see master response 22. See master response 23.

44-53 AND 44-54

Refer to master responses 12, 13, and 15.

44-55

Please see master response 4B.

44-56

For response to the comment concerning the Trust's actions with respect to selection of its preferred alternative, refer to master response 6B and Section 5.2 of the Final EIS.

44-57

For all of the reasons set forth in the Trust's responses to comments and in the Final EIS itself, the Trust disagrees that a supplement to the Draft EIS is necessary. The EIS has been prepared in full accordance with the requirements of NEPA. Because the EIS meets the standards for an adequate statement under the Act and has enabled meaningful analysis, the Presidio Trust has found no compelling reason to recirculate the Draft EIS.

44-58

Thank you for your letter. The Presidio Trust disagrees with the commentors' opinion that the EIS and the site plan for the 23-acre site are flawed. The Trust acknowledges the import and complexity of its responsibility under the Trust Act to preserve and protect the Presidio as a park while ensuring its financial self-sufficiency. The Trust has made clear that it continues to use the GMPA as the master plan that guides the Trust's decision making. Here, the Trust had a rational and legitimate purpose and need (Section 1.2 of the Final EIS) for proposing, as set forth in this EIS, to implement this 23-acre portion of the GMPA's Letterman Complex plan. It is therefore appropriate and consistent with NEPA to have tiered this EIS off the GMPA EIS. Furthermore, all differences between the GMPA

concept and the purpose and need for this site-specific implementation proposal have been fully and adequately analyzed. Regarding the requested information on the Trust's vision for the park and financial management program, refer to master responses 2A, 3A, 4A, 10A, and 10B. Regarding site-specific information on toxics, wildlife, and watersheds, refer to the response to comment 44-42, and master responses 16 and 15, respectively. The range of alternatives considered in the EIS are reasonable in light of the stated objectives of the Presidio Trust, as discussed in master response 6A. Concerning assumptions regarding water usage, parking and traffic, refer to master responses 13, 20 and 18, respectively. Finally, as discussed in master response 12, all significant adverse effects have been identified, and while there is no requirement under NEPA to do so, as noted in your letter (footnote 21), specific mitigation measures have been identified wherever possible and will be adopted as later set forth in the Presidio Trust's final decision on the project.

Letter 45

Comment on the Letterman EIS/Lease Proposal

The choice to negotiate exclusively with Letterman Digital Arts for the redevelopment of the Letterman site is a mistake which could lead inexorably to the perversion of a national treasure.

The mandate to preserve the cultural and natural resources of the Presidio by means of revenue generated within the park is a daunting one. But with 800 structures which can be re-used, and a wealth of opportunities for indoor and outdoor activities for which people are willing to pay, the need to build a new 900,000 sq. ft complex to house what amounts to one corporation has not been adequately demonstrated.

In the course of its two years of existence, we have seen the Trust change its course and veer from the path set by the General Management Plan Amendment (GMPA) for the Presidio. This plan was developed in a very public process facilitated by the National Park Service, and its final form was an amendment to the GMP for the Golden Gate National Recreation Area, of which the Presidio has become a part.

Initial statements by the Trust reflected a desire to choose tenants on the basis of how well their activities fit into and enhanced the national park. An innovative "balance" between more well-heeled tenants and more appropriate (i.e. educational, environmental, social) tenants was touted as a way to reach the 2013 goal of a self-sufficient national park. 45-1

More recently we've heard self-confident predictions from the Executive Director and staff members that the Trust will turn a profit well before the deadline, and then will go about helping idealistic non-profits set up shop in the Presidio. The Presidio must remain public land, a repository of history, a habitat for endangered species, and a place where people come together as equals to grapple with 21st century problems. When the profit motive dominates, even for an instant, the integrity of this centuries-old shrine of nature and society is compromised.

This proposed construction is too large for this national park. The proposed digital activities bear scant resemblance to real human and human-nature interactions for which parks are needed. The process by which this choice was made involved too much bottom-line and too little creativity and time. The Presidio, has for centuries welcomed, inspired, protected, and in some cases dominated people of the nation and the world. Don't let it be dominated by private interests.

James Osborne
194 Academy Lane
Sonoma, CA 95476-4350

Response to Comment in Letter 45

45-1

Thank you for your letter. The commentor's objections are noted for the record. Please refer to Sections 1.1 and 1.2 of the Final EIS for a discussion of the background and need for the project. Please also see master response 2A.

Letter 46

Sierra Club
Presidio Committee

1474 Sacramento Street, #305
San Francisco, CA 94109
August 2, 1999

PRESIDIO TRUST REC'D

The Presidio Trust
NEPA Compliance Coordinator—Attn: Letterman Complex
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

Dear Sirs:

The Sierra Club has reviewed the document created by the Presidio Trust entitled "Draft Environmental Impact Statement and Planning Guideline for the New Development and Uses within the Letterman Complex."

We have found the DEIS to be inadequate. It does not provide information required for the public to make an informed decision on the impact of the proposed Letterman site development on the environment of the Presidio. This includes the impact on parking and transportation, housing, trees and wildlife, and water and sewer services. Some elements of the DEIS are either missing or left so vague as to make a thorough assessment of cumulative environmental impacts for each of the five alternatives impossible. 46-1

Additionally, it is impossible to evaluate the cumulative environmental impacts of the Letterman alternatives without any knowledge of what is planned for such other large scale projects as the Public Health Hospital site, Ft. Winfield Scott and existing buildings across the 1,500 acre Presidio site.

Summary of conclusions
The DEIS does not provide appropriate alternatives or sufficient information for the public to make an informed judgment on development for the Letterman site. The Sierra Club concludes that no contract should be awarded for building at Letterman or elsewhere in the Park until the DEIS is amended to include the following:

- A parkwide transportation plan.
- A parkwide analysis of housing options, including environmental impacts, financial costs and returns.
- A parkwide financial analysis of the Trust including alternative financial models requiring less commercial development.
- Full analysis of impacts of development at the Letterman site on wildlife, trees, and sewer and water services

46-2

Transportation and Parking

The DEIS lacks a transportation plan for the entire Presidio National Park. The problems that this deficiency creates can be seen in the proposed parking structure of the preferred alternative for the Letterman complex. For instance, the proposed underground garage is much larger than required by this complex, but smaller than one typically provided for a suburban office campus. Taken together, these facts will impact transit and parking in the entire Presidio. 46-3

The garage is of a size that will encourage driving and does not help the Trust "to create models of environmental sustainability." Because it will not meet the employees' demands, many employees will seek to park elsewhere in the Park. Even though the Park is relatively small, the Trust will need a complete transportation plan for the entire Park to deal with the parking imbalances at Letterman. 46-4

The Presidio Trust and the National Park Service should work with Muni and Golden Gate Transit to improve transit service to the Park. Golden Gate Transit and Muni should have a transit stop inside the Park near the proposed project. Golden Gate Transit should use some of their buses which run outbound nearly empty to provide near express service from the regional and major Muni transit stations downtown. In addition the employers and the Park should work together to organize van service from the region and from locations in the City. Muni and Golden Gate Transit will have to provide off peak and late night service to allow people to use reliable transit during peak hours and also have service available to use after the peak. 46-5

The developer should build a much smaller garage and reduce the traffic count near the site. We suggest that the downtown San Francisco maximum allowable parking should be used for this site. The San Francisco maximum is about 0.2 parking spaces per thousand square feet. For a 900,000 square foot office the City would allow 180 spaces. This will also substantially decrease the construction cost of the office buildings and increase ground lease payments to the Trust.

Our suggestion is based on following:
a) The 50% of employees will live in the Park and walk, bike or take a Park shuttle to work.
b) That 30% of the non-Park resident employees will walk, bike or take improved mass transit to work (similar to 50% of San Francisco workers). 46-6
c) There are three employees per 1,000 square feet.
d) If all of the remaining employees take a van with ten passengers (vans typically hold 14 people), the required number of van parking spaces is: (2,500 employees) (0.5 residents) (0.7 non residents) (0.1 vans/employee) = 88 spaces required.

The remainder of the allowed 180 spaces (92) should be ample for visitors and emergencies.

Whether this small garage or the large garage as proposed is built at Letterman, the Trust should adopt policies to reduce commuter parking in the nearby parking spaces within the

Park. The Sierra Club urges the Trust and NPS to use high hourly parking rates for employees and visitors to transfer demand from autos to transit and to employee van service. The surrounding neighborhood can make use of the City's residential parking permit system to restrict commuters from parking on their streets. 46-6

If the Trust makes the entire Park a model of sustainability in the transportation area, the income from parking fees will be large enough to allow a reduced level of commercial activity. Parking fees at the Presidio, now charged in all state park facilities, will substitute for the absence of entry fees, a feature of all National Parks. 46-7

Size of the Development and a Financial Plan

The trust has not provided the public with a financial analysis of the Presidio. Because of this, the public has no way of judging how many square feet of development is really required for the preferred alternative or the other alternatives in relation to the overall area of development required for the entire Park.

The Trust estimates that it will need income of $ 36 million in 2013, but the Presidio will be a better park, environmentally and in other ways, if it is possible to reduce the amount of commercial development. To determine whether commercial development can be reduced, it is necessary to consider the financial operation of the park as a whole. A high priority is to reduce non-residential commercial uses, at Letterman, the PHS site and Ft. Winfield Scott.

Reduction of commercial activity will reduce revenues to the Trust and it will be necessary to identify cost savings to adjust for the lower level of revenues. We have shown above (in our discussion of parking) that there are other possible areas of revenues that could be explored. 46-8

This economic analysis should begin with an examination of the level of activity, or building space options, at Letterman. We propose examining reductions of $1 million and $2 million from the proposed $5 million in expected revenue from the 900.000 sq ft buildout; this implies developments of approximately 720,000 sq ft and 540,000 sq ft respectively. It may be with full disclosure, analysis and review, that the Sierra Club and the public may favor full 900,000 sq ft use at Letterman. It may not.

While the DEIS does examine the 500,000 sq ft alternative 1 for an office complex and rejects it for a number of reasons, including financial, the DEIS does not advise the public of what cuts in services throughout the park would occur if this reduction in size and revenue were to occur. The relative size of the reduction would be $2 million, or 5% of total receipts.

If the reduction in scale was to 720,000 for Letterman, and $1 million in Trust receipts, that would mean a reduction of 2.5% in total receipts to the Park. The analysis of effects on the park's activities affected by that level of reduction in expenditures needs to be spelled out for the public.

Perhaps the Trust has no option other than a 900,000 sq. feet buildout, since any reduction in Letterman might mean not achieving self sufficiency. But it is possible that a reduction can be absorbed by lowering the level of operating costs or improvement expenses.

We hope that the Trust, with its large income base, can achieve a balance between commercial and non-commercial use and still provide the minimum operating and improvement budget consistent with long term goals. 46-8

The framework for financial and environmental analysis is the park as a whole, not just the Letterman area, since receipts to the Trust are used for the entire park.

Housing

The Trust has rejected the alternatives for Letterman that would have provided housing in addition to other facilities. The Trust has stated that it plans on providing an additional 500 units somewhere in the built up area of the Park.

The Trust may have made the right decision, but the public has no way of judging whether this is so. The Trust has not provided the public with the specifics as to the location, cost, and impacts of the unspecified housing options to the Letterman site. The public cannot reasonably be expected to voice an opinion on the relative merits of housing at the Letterman site vs. other sites.

Providing the housing at locations in the Presidio near employment centers—such as building new housing at Letterman—would reduce intra-Presidio traffic, and require less intense intra-Presidio transit. However, it is also possible that building new housing at Letterman would intensify the traffic problem at the Lombard Gate, and that building at existing housing communities would disperse the traffic impacts. Without an housing analysis, there is no way for the public to judge between the two possible effects. 46-9

Even if there is no housing at the Letterman site, as the preferred alternative proposes, the lack of a housing plan for the entire park still affects decisions made about the Letterman site. For instance, converting existing 4 bedroom duplexes to 2 bedroom units could increase the number of units at least cost, providing maximum housing availability for the anticipated Presidio workforce. By reducing the amount of new investment, it would increase ground rent paid to the Trust, reducing the need for funds from other sources, including Letterman office space. Without a parkwide analysis of housing, the public has no way judging.

And finally, without an overall Park housing plan, the public has no way of judging the Trust's figure of 500 units in the built up area of the Park. Providing additional housing in the Presidio may be necessary to achieve the 2:1 jobs/housing balance called for in the General Management Plan, avoiding the need for more commuting to jobs.

The Trust should not proceed with awarding a contract for the Letterman site without a full and complete housing plan for the entire Presidio, for review with the public.

Trees and Wildlife

The public expects and the law requires an environmental impact statement to describe the impact of a project on the natural environment. The Letterman DEIS does not do this. It provides no information on the mature trees or wildlife, nor is there any discussion on how each of the five alternative proposals would impact trees and wildlife. Given this, DEIS does not provide the information required for the public to determine the impact of each of the five alternatives on the natural resources of the area.

In Appendix B, Planning Guidelines of the DEIS, is states that the natural landscape guidelines are intended to protect, preserve, and enhance" natural features that include "exiting mature trees," and the "wildlife habitat areas which occur in association with these existing trees." Unfortunately, the DEIS doesn't follow it's own guidelines. 46-10

The DEIS discussions of the affected environment (Section 3) and the alternatives don't provide any information about the mature trees in the area. It doesn't list the numbers, sizes, or species of trees, or their condition or age. It doesn't give an estimate of how many would be removed or protected and preserved, as the appendix sets as a guideline. It doesn't mention the effect on wildlife of removing the trees. Nor does the description of the affected environment provide any information about the species of birds that are known to nest and feed in the area of the Letterman complex. Bird species known to be in the area include red shoulder hawk, barn and tree swallow, quail, and cardinals.

Storm Drainage: Non-Point Source Pollution

Section 2.6.4 Storm Drainage (page 36) is one example of omitted or vague data. It says: "A storm Water Pollution Prevention Plan (SWPPP) would be developed to assist the Presidio Trust and its tenants in complying with the National Pollution Discharge Elimination System (NPDES) storm water requirements set forth in the Clean Water Act, and other applicable requirements."

46-11

This is vague and lacks necessary details. Instead of "would be developed," the DEIS should tell by what process this would be achieved and when this would occur. Non-point source pollution is the largest contributor of pollution to the San Francisco Bay. The SWPPP needs to have been already formulated and available to the public so that it can evaluate the cumulative environmental impacts of each of the DEIS alternatives (1 through 5).

Water Supply

The DEIS states that Letterman Complex will use all the potable and nonpotable water available in the Presidio, and may exceed it. For instance on, pages 53 and A-6, the DEIS states that the City of San Francisco will supply the needed water that cannot be obtained from Lobos Creek. It states a possible need of 10,000 gallons a day from the City. 46-12

However, Section 3.5.2 (page 54) states that "Lobos Creek will be unable to meet" the Presidio high-use and reduced demand assumptions "and still maintain the 0.5 mgd minimum flow of water in Lobos Creek."

With Letterman using all of the water available in the Presidio or exceeding it, this implies the rest of the 1,500 acre Presidio, including the Public Health Hospital site and existing buildings and landscaping, will get its water from the City of San Francisco. This could be an enormous amount, and nothing in the DEIS suggests that the City of San Francisco actually has the capacity.

The DEIS mentions planning for "water conservation measures" (page 54), but doesn't estimate how much this could save. In addition, volunteer conservation measures cannot be assumed to effectively mitigate excess water demands. 46-12

An environmentally sustainable model of the new office building should include a *gray water* system to recycle gray water for toilet flushing to reduce the demand for potable water and sewage treatment capacity. (The City is currently planning to use recycled water.)

Sewer Capacity

The problems with the DEIS statements on sewer capacity are similar to those with water capacity. The DEIS states that the City's Southeast Water Pollution Control Plant will handle letterman's sewage (page A-7). As with the analysis for water supply, the sewer analysis doesn't mention how the requirements for the Letterman Complex relates to the requirements of the Presidio as a whole. 46-13

Summary

The DEIS does not provide appropriate alternatives or sufficient information for the public to make an informed judgment on development for the Letterman site. The Sierra Club concludes that no contract should be awarded for building at Letterman or elsewhere in the Park until the DEIS is amended to include the following:

- A parkwide transportation plan.
- A parkwide analysis of housing options, including environmental impacts, financial costs and returns.
- A parkwide financial analysis of the Trust including alternative financial models requiring less commercial development.
- Full analysis and information of impacts of development at the Letterman site on wildlife, mature trees, and sewer and water services

46-14

Sincerely,

Rebecca Evans

Rebecca Evans
Sierra Club Presidio Committee

Responses to Comments in Letter 46

46-1

Thank you for your letter. The Presidio Trust disagrees with the commentor's opinion that the EIS is inadequate. The EIS has been prepared in full accordance with the policies and purposes of NEPA. The analysis of impacts requested in the commentor's letter are addressed in the Final EIS, and the responses to comments 46-3 through 46-13 below address each impact individually. With regard to cumulative impacts, please refer to master response 4B.

46-2

The conclusions summarized in this comment letter are addressed in detail in the responses to comments 46-3 through 46-13.

46-3 AND 46-4

Refer to master response 20.

46-5

The Presidio Trust's Transportation Manager meets regularly with both MUNI and Golden Gate Transit with the goal of improving transit service to the park. Current and proposed relocated Golden Gate Transit and MUNI #28 stops are on Richardson Avenue, within 400 feet walking distance of the site. Stops for MUNI #43 and #82X are within 100 feet walking distance of the site. Current stops for MUNI #41 and #45 routes are on Lyon Street within 800 feet walking distance of the site. Extension of the #41 and #45 trolleycoach lines into the Presidio (giving these routes the same stops as the #43 and #82X) is included among MUNI's long-range capital planning projects.

The Trust planned to contract with Golden Gate Transit for reverse-commute service. The Golden Gate Transit Board approved the contract, subject to concurrence by the city. Concurrence has not yet been granted and so the Trust has been working with MUNI to expand and improve service reliability via the 82X line.

Van service may be part of the park's overall TDM strategy when a larger employee population is present. Vanpool matching and parking preference is part of the development team for Alternative 5's TDM plan.

The Trust will be working with MUNI and Golden Gate Transit to expand non-peak service as the park's employee population grows. A Guaranteed Ride Home program is part of the development team for Alternative 5' TDM plan to accommodate persons who work later than the last bus or their carpool program.

46-6

The San Francisco Planning Code parking supply standards indicate minimum parking requirements, not maximum parking requirements. The GMPA (page 74) states that "Future Letterman tenants will be required to manage parking to discourage unnecessary automobile use and reduce the potential for overflow parking in adjacent neighborhoods and areas of the Presidio." In an effort to achieve both of these objectives, the EIS assumes trip characteristics that do not substantially underestimate or overestimate parking demand. Because transit service is not and is unlikely to be as available at the Presidio as it is in downtown San Francisco, the proportion of transit trips achieved in downtown San Francisco probably could not be achieved at the Presidio. Therefore, constraining the parking supply cannot be used as readily to promote alternative modes of transportation.

In response to the basis for the suggestions:

a) Although the Trust has a goal of having 50 percent of park employees living in the park, the Presidio does not contain enough housing to accommodate 50 percent of Letterman employees and still serve other Park employees.

b) The assumption that 30 percent of non-Presidio employees will take non-transit modes has been made in the EIS.

c) A factor of three employees per 1,000 square feet was assumed in the EIS.

d) The commentor's proposed level of vanpooling is very ambitious and, to the knowledge of the EIS preparers, has not been achieved anywhere in the Bay Area.

For a response to the remainder of the comment see master response 20.

46-7

The revenue from proposed parking fees is intended to fund 1) administration of the parking program, 2) a portion of the park's TDM program, and 3) possible underground parking. It is not currently expected that parking would generate revenue beyond that needed for these functions to help the Trust meet its goal of financial self-sufficiency. Also see master response 18 regarding offsite traffic issues related to the proposed new intersections on Richardson Avenue.

46-8

Please refer to the Financial Management Program in Appendix E of the Final EIS, and master responses 10A and 10B. See also Sections 1.1 and 1.2 of the Final EIS.

46-9

As indicated in Section 4.5.5 of the EIS, the additional regional housing demand created by employment associated with the Digital Arts Center from outside the Bay Area would be 481 units. Presidio housing stock (1,116 single-family and multi-family units and 188 units in buildings that formerly served as barracks) would accommodate about 55 percent of this demand. New demand for regional housing would be 216 units, which is less than 0.5 percent of the estimated new housing construction between 2000 and 2010, and less than 1 percent of currently vacant units in the Bay Area. While the development of new housing at the Presidio may be desirable in the future to strengthen the jobs/housing balance at the Presidio, at this time it is speculative, and not essential to mitigate housing impacts from employment associated with a Digital Arts Center. In addition, while a Digital Arts Center does not envision housing on the 23 acres, no housing was contemplated on the same 23 acres in the GMPA.

The Presidio Trust will conduct additional environmental analysis to implement site-specific projects, including the development of a housing management plan, if not already adequately analyzed in the 1994 GMPA EIS. The Presidio Trust intends to initiate a housing study in 2000, with opportunities for public participation.

46-10

Refer to master response 16.

46-11

The commentor is referred to mitigation measure TS-1, *Storm Water Pollution Prevention Plan* in Section 4.7 of the Final EIS for the requested process. Since Section 2.6.4 of the Draft EIS repeats information provided in more detail in the later section, the measure has been deleted from the Final EIS. However, the text of mitigation measure TS-1 has been revised to include the additional detail requested by the commentor. For a discussion of the SWPPP with regard to cumulative impacts, refer to master response 4B.

46-12

First Paragraph – The EIS does not assume that the Letterman Complex would consume all the available water supply at the Presidio. The first sentence of Section 3.5.1 states that, in the past, the Presidio's water was supplemented by purchases from the city. Section G.1, Water Supply and Distribution in Appendix A of the EIS indicates that the GMPA EIS anticipated that a minimal amount of water from the city would be required under Alternative 1 should water of a purity that is not available from onsite sources be required. The discussion in Appendix A concludes that potable water may not be required from the city to service the Letterman Complex since the LAIR facility would not be considered for health research under Alternatives 2 through 5.

Second Paragraph – The reference to the text is correct but taken out of context. The discussion concluded that the Presidio Trust was pursuing alternative sources of water supply (such as use of reclaimed water for irrigation) as well as reducing water demand through conservation measures in order to fit its water budget.

Third Paragraph – The EIS assumes that the Letterman Complex would be allotted 6.3 percent (88,798 gpd) of the total water available in the Presidio in a typical rainfall year (Table 12 in the Final EIS). The preferred alternative would require slightly less (6.0 percent or 84,574 gpd). With implementation of park-wide water conservation measures identified in mitigation measure WS-2, *Water Supply- and Demand-Side Solutions to Reduce Cumulative Impacts*, and the water reclamation plant in mitigation measure WT-1, the water used within the Presidio would come from onsite sources and would be treated by onsite facilities, and total water consumption would not exceed total water available within the park (see master responses 13 and 14).

Fourth Paragraph – In response to this and other comments, estimated water savings from implementing mitigation measure WS-2, *Water Supply- and Demand-Side Solutions to Reduce Cumulative Impacts* are provided within the measure. The measure would result in a water savings of approximately 120,000 gpd (not including use of reclaimed or purchased water), which would represent approximately 42 percent of the net cumulative peak shortfall of 285,776 gpd (refer to Table 12 in the Final EIS and master response 13).

Fifth Paragraph – Toilet water would be reclaimed for irrigation use, which would have a similar beneficial effect on potable water demand and sewage treatment capacity as recycling gray water. See master response 14.

46-13

The "problems" of water supply and sewer capacity are treated differently in the EIS based on the tiering analysis provided in Sections G.1, *Water Supply and Distribution* and G.2, *Wastewater Treatment and Disposal* in Appendix A of the EIS. The commentor is referred to Sections 4.1.11.2 through 4.6.11.2 (Water Supply) of the Final EIS for a discussion of the relationship between project and park-wide water requirements. A similar discussion on sewer capacity is not required because the tiering analysis in Section G.2, Wastewater Treatment and Disposal determined that the Letterman Complex would not result in any additional impacts on sewer capacity that were not previously discussed in the GMPA EIS. It should be noted that the Presidio water reclamation system would reduce those park-wide cumulative impacts that were previously disclosed in the GMPA EIS.

46-14

These concluding remarks are individually addressed in the responses to comments 46-1 through 46-13 above.

Letter 47

Tides Foundation

The Tides Center

P.O. Box 29903
San Francisco, CA 94129-
Tel: 415.561.6100
Fax: 415.561.6101

August 2, 1999

RECEIVED TRUST REC'D
AUG 3 57

NEPA Compliance Coordinator
Attn: Letterman Complex
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

Re: Comments of the Tides Foundation and The Tides Center Regarding the Draft Environmental Impact Statement and Planning Guidelines for New Development and Uses Within the Letterman Complex

Dear NEPA Compliance Coordinator:

This letter constitutes the comments of the Tides Foundation and The Tides Center (Tides) regarding the Draft Environmental Impact Statement ("DEIS") on the proposed development of 23 acres of the Letterman Complex in the Presidio and on the planning guidelines for the entire 60-acre Letterman Complex. For the reasons discussed below, Tides is concerned that the current process for the selection of a project to redevelop the 23-acre site has significantly diverged from the vision and goals of the General Management Plan Amendment ("GMPA"), the general management plan for the Presidio prepared by the National Park Service. This plan, an excellent framework for the conversion of the former military base into a unique and visionary national park, was the result of a careful and thorough public process. We are troubled to find that, in its first major undertaking since assuming responsibility for most of the Presidio, the Presidio Trust appears to have given minimal notice to the vision and goals of the GMPA. Instead, it seems have proposed terms of site redevelopment and selected a project based primarily on economic return, relegating the public's interest in an environmentally-focused, visitor-serving, and integrated national park to a relatively minor consideration. 47-1

Lucasfilm's Digital Arts Center project ("DAC") has been improperly selected well before the close of the public comment period on the DEIS, and the DEIS plainly demonstrates that neither that project nor any of the alternative projects seriously considered fulfills the vision of the GMPA or the sound planning guidelines for the Letterman Complex proposed in this same DEIS. Further, the DEIS has failed in a number of respects to look at the full scope of environmental impacts that the proposed development of 900,000 square feet of replacement structures on the 23-acre project site would have, including its impacts on the Presidio's natural resources and scenic qualities and the cumulative impacts that this project, in concert with other readily foreseeable renovation and reuse projects within the Presidio, would have on the very nature of the Presidio as a part of the Golden Gate National Recreation Area ("GGNRA"). Equally importantly, the DEIS -- and the Trust -- have neglected to look at the negative reverberations that this sort of fiscally-driven

development could have on national parks across the nation. 47-1

Tides Is Committed to the Implementation of the Vision and Goals of the GMPA.

The Tides Foundation and the Tides Center are tenants of the Presidio in the Letterman Complex. However, the concerns we raise in these comments are not those of a neighbor to the proposed development concerned about traffic and other direct impacts that the development could have on our facilities. (This is not to deny the importance of such issues, which have been raised, for example, in the comments of Thoreau Center Partners). Rather, our intent is to address the extent to which the proposed DAC and the alternative development proposals, and the process by which these proposals are being evaluated, depart from the GMPA's vision for the Presidio. We further comment upon the extent to which the DEIS fails to meet the public informational requirements of the National Environmental Policy Act ("NEPA") in failing to recognize the Trust's departure from the GMPA and in other significant respects.

Tides' central concern is that the extraordinary vision of the GMPA be carried out in the planning and decision making for all areas and structures in the Presidio. The GMPA's blueprint for the Presidio as a unique national park promoting environmental sustainability and creative solutions to issues confronting humanity globally was the magnet that drew Tides to the Presidio.

> The Presidio of San Francisco...will pioneer a new role for a national park *by creating a global center dedicated to addressing the world's most critical environmental, social, and cultural challenges.*
>
> The Presidio's new role symbolizes the swords-into-plowshares concept.... The transformation [from military base to park] is inspired by a newly emerging definition of protection -- the one that recognizes that security is no longer based solely on political and military strength, but on *stewardship of the world's human and physical resources through global cooperation.* 47-2
>
> Long the guardian of the Golden Gate, the Presidio now stands ready to house *a network of national and international organizations devoted to improving human and natural environments and addressing our common future.* The site will be used as *a working laboratory to create models of environmental sustainability that can be transferred to communities worldwide.*
>
> --Final General Management Plan Amendment (emphasis added)

These notions are reinforced and refined by overall goals for the Presidio presented in the GMPA. For example: "The Presidio will be a dynamic setting for a network of institutions devoted to the stimulating understanding of and action on the world's most critical social, cultural and environmental problems." "The Presidio will be a lively and active community. The site will be used to create models of environmental sustainability, perfecting practices and technology that can be transferred to communities worldwide." "An environmentally responsible transportation strategy will be implemented to minimize private automobile use and increase the availability of public transit, pedestrian, and bicycle travel options." GMPA, Plan Highlights, p.viii. The GMPA goals also emphasize visitor activities, education about the Presidio's history and resources, and preservation and enhancement of the Presidio's historic, cultural, and natural resources. *Id.*

Tides was -- and remains -- excited by this far-sighted approach, the conversion of a spectacularly situated, historically remarkable military base into a national park that would protect and enhance the site's natural and historic resources while renovating the numerous structures on the Presidio to serve as "a global center dedicated to addressing the world's most critical environmental, social, and cultural challenges." We want very much to be a part of the Presidio's community of organizations devoted to environmental improvement and working to create models of environmental sustainability for global dissemination. In our Statement of Qualifications seeking to establish the Thoreau Center, we explicitly stated our desire to participate in the GMPA's vision for the Presidio: "The Thoreau Center will provide a home for a group of research and educational activities focused on the complex and inextricable connections between human society and the natural environment...Promotion of environmental stewardship and sustainability has been a core purpose of Tides since its inception in 1976." At this earliest stage, Tides made clear its commitment that its reuse of the Letterman Complex buildings in which it was interested would "model the application of principles of sustainability in the conversion" of these buildings, thus pioneering a pattern of sustainable practices in the renovation and reuse of the many other structures in the Presidio.

Tides has been quite successful in furthering our original goals. We have been delighted to see other park partners -- as diverse as the Gorbachev Institute, Swords to Plowshares, and the Gulf of the Farallones National Marine Sanctuary -- join the community of organizations that, each in its own way, contribute to the GMPA's lofty goal of "improving human and natural environments and addressing our common future." Naturally, we do not expect any of these organizations to follow the exact model or promote the identical interests of Tides. The genius of the GMPA's vision is that it anticipates the assembly across the Presidio (as in microcosm at the Thoreau Center) of a wide variety of organizations working on issues of environmental and societal improvement and sustainable practices at a variety of levels and from a variety of distinct perspectives. In fact, the cross-pollination of ideas and collaboration on projects of mutual interest among these diverse organizations will be one of the key routes to progress and innovation in addressing the challenges each pursues. 47-2

What we do expect, under the clear direction of the GMPA, is that any major new proposal for use of facilities in the Presidio be judged in significant part on its contribution to the creation of the lively, active community creating models of sustainability and working on "the world's most critical social, cultural and environmental problems" that the Presidio plan envisions. But the Letterman development project under review in the DEIS has not been measured against this standard and offers little of significance to advance the GMPA's principal aims. Instead, the chosen project sets a very low standard for what the Trust is willing to find compatible with the GMPA, conforming in few respects to the vision and goals of that management plan or to the Planning Guidelines for the Letterman Complex presented in the DEIS.

We are reluctant to criticize the actions of our landlord. However, we feel it incumbent upon Tides, as a staunch supporter of the vision and goals of the GMPA, to call the Trust's attention at this first major juncture to its apparent retreat from that vision, perhaps motivated by the pressure to make the Presidio self-funding. It is in this spirit of recalling the Trust to the central vision of the Presidio as a unique national park, dedicated to global problem-solving and the creation and promotion of sustainable systems, that we offer these comments and pledge our continuing cooperative efforts to help bring that vision to full fruition.

The Digital Arts Center project is not consistent with either the vision and goals of the GMPA or the draft Planning Guidelines for the Letterman Complex.

Although the DEIS asserts that the DAC project is consistent with the GMPA, this is not an accurate statement. To reach this conclusion, the Trust reduces the clear guidance of the GMPA to four very general "objectives" which are presented as the only objectives of the GMPA. DEIS, p.6. These "objectives" say no more than: (1) the resources of the Presidio should be preserved and, where appropriate, enhanced; (2) public utilities and policing should be provided in "an environmentally responsible manner;" (3) open space should be increased, development consolidated, and "appropriate" uses approved, particularly uses that involve any of a long, unprioritized list of broad topics (including "research," "innovation," and "communication"); and (4) the Presidio should be sustained economically and physically as a great urban national park. Completely missing from the Trust's identification of "*the* general objectives of the GMPA" (*id.* (emphasis added)) are any objectives to carry out the GMPA's primary vision of the Presidio as "a global center dedicated to addressing the world's most critical environmental, social, and cultural challenges" or as "a working laboratory to create models of environmental sustainability." As discussed above, these defining elements of what the Presidio is to be as a national park are elaborated upon in the GMPA as among the "highlights" of the plan. GMPA, p.viii. Yet the Trust seems to posit that mere listing of "stewardship and sustainability" among a long, non-exhaustive list of "appropriate uses" in the Presidio is sufficient to capture these key objectives of the GMPA. We believe that the Trust's identification of general objectives puportedly drawn from the GMPA are of such importance to the future management of the Presidio that these should themselves be submitted for public review and comment. 47-3

It is only by comparing the DAC project to these vague "objectives" that the DEIS can assert that it is consistent with the vision and goals of the GMPA. DEIS, p.161. A look at the proposal shows that it has little to do with the GMPA's clear objectives to favor uses dedicated to addressing "the world's most critical environmental, social, and economic challenges" and to creating "models of environmental sustainability." The Lucasfilm project is essentially a private business use, "an office campus for a single institutional user engaged in research, development and production of digital arts and technologies related to the entertainment industry." DEIS, p.31. While Lucasfilm is justly renowned for its contributions to advances in high-tech entertainment, its "research" is of a commercial, profit-making nature, and its activities can scarcely be categorized as addressing the most critical global problems or providing models of environmental sustainability.

The DAC is a complex of three four-story office buildings with private courtyards that would employ 2,500 people. DEIS, pp.31-33. It would not provide housing for any of its employees, all of whom would have to commute to the site from their homes; it would provide underground parking for 1,500 vehicles. DEIS, p.33. In creating a use to which employees will have to commute and providing considerable parking, it is inconsistent with the GMPA's clear objective "to minimize private automobile use and increase the availability of public transit, pedestrian, and bicycle travel options." While the DAC would provide some minor amenities to the public at large -- a cafe, coffee bar, restrooms -- well over 90% of the 900,000 square feet of new construction would be dedicated to private offices and other business uses. DEIS, p.31. This runs counter to the GMPA's strong emphasis on visitor activities and access. In sum, the DAC is a private "office campus" for a very lucrative business.

Not only does it lack any clear relationship to the GMPA's vision and real objectives for the Presidio as a national park, but the DAC is also in conflict in a many respects with the sound Planning Guidelines for the Letterman Complex set forth in Appendix B of the DEIS. Without any attempt here to be exhaustive, we simply mention some of the more obvious inconsistencies. The introduction to the Guidelines states that the "key to successful redevelopment" of the Letterman Complex is in "creating a diverse, lively, publicly accessible community." DEIS, p.B-14. By contrast, the DAC is a "single institutional user," almost entirely private business campus. The Guidelines call for projects that "encourage visitors" and "enhance linkages between the Letterman Complex and the rest of the Presidio, and as possible the City." *Id.* The DAC is a self-contained private business complex with little to offer any but the limited visitors who are specialists in digital arts and with no connection to the national park. "Development patterns reminiscent of a[n]...exclusive campus are strongly discouraged." DEIR, p.B-27. The DAC *is* an exclusive office campus built around a series of private courtyards. The Guidelines call for the promotion of "decrease[d] dependence on automobiles" and "a strong jobs/housing balance" to foster "energy-efficient and sustainable transportation practices." DEIS, p.B-41. The DAC would employ 2,500 people, provide no on-site housing, and offer 1,500 parking spaces. 47-4

In sum, despite the ill-founded assertions of the DEIS that the DAC is consistent with the GMPA, it is plainly in conflict with several of the central tenets of that plan and also inconsistent with the Planning Guidelines the Trust has itself proposed to guide development of the Letterman Complex. As we will discuss below, the handful of other alternatives seriously examined in the DEIS, while perhaps conforming a bit more closely to the Planning Guidelines than does the DAC, are of an identical scale to the DAC and are no more designed to satisfy the vision or overall objectives of the GMPA as the overarching plan for the conversion of the Presidio to a unique national park.

The DEIS fails to examine a reasonable range of true alternatives to the project.

A major problem in the DEIS is its failure to examine a range of alternatives that test the underlying premises of the development action proposed to determine if there are less environmentally disruptive ways to achieve the same basic goal, the redevelopment of the Letterman Complex in a manner that is consistent with the GMPA and contributes to a secure economic future for the Presidio. Unfortunately, the alternatives seriously considered by the Trust (as set forth in Chapter 2 of the DEIS) offer an unduly circumscribed set of options, none of which questions some important and unexamined premises about development at the Letterman Complex.

With the exception of the No Action alternative, included by requirement of NEPA for comparison purposes and not a seriously considered option, all of the alternatives described assume 900,000 square feet of development on 23 acres of the Letterman Complex. The DEIS maintains, without offering any evidence or analysis, that this level of development is necessary "to generate sufficient revenue to allow the Presidio Trust to achieve financial self-sufficiency by fiscal year 2013." DEIS, p.45. However, nowhere does the DEIS offer any basis for its conclusion that 900,000 square feet of development on 23 acres of the Letterman Complex is necessary to achieve this goal. (See the following section of these comments regarding the lack of sufficient financial information in the DEIS to allow the public to understand and comment informedly upon the merits of the Letterman development proposals.) Given this lack of justification for the narrow range of alternatives examined, the DEIS should include environmentally superior alternatives that propose smaller developments and/or developments that would occur on a different area or 47-5

configuration of the 60-acre Letterman Complex. Without such alternatives, it is impossible for the public -- or the decision-makers -- to judge rationally the merits, environmental and otherwise, of the very constrained set of proposals currently presented in the DEIS. 47-5

The financial assumptions that have driven the selection of the DAC proposal are not revealed in the DEIS and must be identified for public information and comment before a final Letterman development project is approved.

As noted above, the DEIS claims that 900,000 square feet of development at the 23-acre Letterman Complex site is necessary "to generate sufficient revenue to allow the Presidio Trust to achieve financial self-sufficiency by fiscal year 2013." DEIS, p.45. However, the public, in reviewing the DEIS and its analyses, is forced to accept this statement on faith, because the DEIS offers no evidentiary or analytical basis whatsoever for the conclusion that this level of development at the Letterman site is essential to the Trust's achieving financial self-sufficiency. Moreover, neither in the DEIS nor elsewhere has the Trust made public its financial plan for the Presidio. Without any notion of what assumptions the Trust is making regarding the level of revenue needed for self-sufficiency, and of where on the Presidio it proposes to raise what proportions of that revenue, it is impossible for members of the public to consider or comment upon the need for or the relative merits of the development proposals presented.

Going a level deeper, why has whatever financial plan under which the Trust is operating never been exposed to public scrutiny and comment itself? Clearly, determinations about the level of revenues that need to be derived from the Presidio to make it self-sufficient have profound environmental consequences for the Presidio, since these determinations will directly drive decisions about the nature and intensity of revenue-generating uses that will be allowed there. Both under the Trust's statutory obligations to seek input from the public throughout its decisionmaking process and its NEPA duties to consider the full environmental implications of its actions before it takes those actions, it is essential that the Trust's financial plan be submitted for public review. 47-6

Only with such review can the public reasonably consider and advise the Trust upon the wisdom of the fiscal course it has charted, with particular attention to the environmental implications of that course. As matters stand, it is unclear whether the Trust has adequately considered all reasonable means of reducing expenses for the rehabilitation and maintenance of the Presidio's structures, infrastructure, and landscapes as an alternative to raising revenues through redevelopments and remunerative reuses at the levels now planned. While we understand that the Trust is under a current obligation to achieve self-sufficiency by 2013, we strongly believe that the process of determining what level of revenue-generating redevelopment and other reuse is necessary to achieving that self-sufficiency for a national park unit is too momentous to take place behind closed doors. Rather, any determination about the measures necessary to secure financial self-sufficiency for the Presidio would benefit greatly from the ideas that would emerge from a broad and thorough public discussion of the Presidio's fiscal needs and the best means of meeting those without impairing its character as a visionary and first-rate national park.

The outcome of such public review and discussion might be the identification of means to achieve self-sufficiency more consistent with the Presidio's park purposes than the current financial plan allows. On the other hand, the outcome might be a widespread public recognition that the Presidio cannot reasonably achieve financial self-sufficiency without compromising too many of its resources and too much of the vision that are necessary to its being a great national park. In the latter case, the public process could serve as a rallying point for returning to a future Congress to modify the terms of the Trust's authorizing

legislation to avoid sacrificing the Presidio's resources and park character to an unrealistic goal of self-sufficiency.

Without detailed information about the financial assumptions that underlie the decision to seek 900,000-square-foot development proposals for the 23-acre Letterman site and to select the Lucasfilm project, assumptions that will also drive determinations on the renovation and reuse of many other facilities in the Presidio, the public cannot effectively participate in the Presidio planning process. While taking the time now to go through this critical exercise with the public may seem untimely to the Trust, facing the 2013 deadline for self-sufficiency, the dangers of not doing so are far greater. If the Trust proceeds on its course of piece mealing its reuse decisions for various areas of the Presidio without making clear its overall vision, the likely result will be a major loss of public confidence in the ability of the Trust to manage the Presidio *as a national park* and a consequent loss of public support for the park itself. Simply put, the public is not likely to rally to the defense of the Presidio, or to commit itself to the long-term stewardship of its resources, if significant portions of it are being committed to private, for-profit uses that exclude the public, based on financial decisions that the public has been allowed no role in formulating. 47-6

The selection of the DAC as the successful proposal and the exclusive negotiations with its applicant before the close of public comments on the DEIS violates both the spirit and the letter of NEPA.

The Trust's selection of a successful applicant long before the close of public comment on the DEIS is an indicator of the extent to which the planning process for the Letterman development proposals treats public comment as a formality to be got through rather than an open opportunity for the public to make the final project better from an environmental perspective, as NEPA intends. Arguments that no final determination has been made in the NEPA process are hollow in light of the Trust's announced determination to conduct exclusive negotiations on the final form of Letterman development with Lucasfilm alone. It is not feasible for the public to seriously believe that the Trust will negotiate a final project with Lucasfilm and then select another development alternative as the result of issues raised in comments on the DEIS. 47-7

The DEIS fails to look at the impacts of the Letterman development project on the resources of the Presidio as a whole and to consider its impacts cumulatively with other foreseeable projects throughout the Presidio.

The central purpose of an environmental impact statement is to provide the public a full and fair assessment of the adverse environmental impacts that the project could entail. Yet the Letterman DEIS fails in several significant respects to examine the impacts that the DAC would have by itself and, even more critically, those it would have when considered cumulatively with the other renovation and reuse projects that are necessarily envisioned for many other structures in the Presidio. The DEIS claims to be "tiered" off the analyses in the 1994 EIS on the GMPA, that is, to rely on those analyses as providing basic information about the Letterman project's impacts. However, given that the alternatives under consideration in the DEIS are inconsistent with the vision and goals of the GMPA, differ in site size from the area examined in the GMPA EIS (23 acres versus 60 acres), and make different assumptions about what the project involves (the GMPA assumed that only one of the two Letterman Complex buildings would be demolished), the impact analyses in the GMPA EIS are not directly applicable to the present project. Moreover, even if tiering were appropriate, this EIS, which is on a site-specific project rather that an overall program, should provide more, and more specific, information than did the programmatic GMPA 47-8

EIS. Yet in crucial respects it provides no information at all.

The DEIS's analysis of environmental consequences provides no information on the DAC's or other alternatives' impacts on natural resources on or around the Letterman site. DEIS, Ch. 4. There is simply no information in the DEIS about the vegetation in the project area, or about the wildlife dependent on that vegetation, and, consequently, no analysis of any of the development alternatives' effects on those resources. To give just one example, one of the northernmost coastal breeding populations of the hooded oriole, *Icterus cucullatus*, nests in a group of palm trees on the south side of the site. One searches the DEIS in vain for any mention of this fact, let alone of the impacts of a major demolition and construction project on these trees and birds. Likewise, no analysis is offered of the site's hydrology, or of the alternatives' impacts thereon. This is particularly troublesome with respect to the DAC proposal, which intends to divert stormwater drainage to a "lagoon" water feature on the site, whereas the Planning Guidelines contemplate that stormwater from this area would be directed to restoration of the Tennessee Hollow natural riparian corridor and the restored wetland downstream at Crissy Field. DEIS, pp.31, B-21. The DEIS is also deficient in failing to provide any analysis of the alternatives' visual impacts from other areas of the Presidio, despite the obvious fact that this is a proposal for major new development *inside a national park and within the Presidio National Historic Landmark District*. 47-8

Also lacking in the DEIS is any analysis of the impacts of the Letterman development project when considered cumulatively with the impacts from other reuse, renovation, and redevelopment projects that are foreseeable across the Presidio. Given that the Trust has departed significantly from the goals of the GMPA, drawing from it only four vague "objectives" by which to guide future planning on the Presidio, the analyses in the GMPA EIS, which assumed the achievement of that plan's clear vision, are of very questionable applicability to the Trust's current efforts. The Letterman DEIS should formally examine the cumulative consequences of renovation and redevelopment projects at sites across the Presidio being chosen on the basis of the four vague "objectives" and a policy of achieving high financial returns. This analysis should reveal the cumulative impacts of these developments on the Presidio as a whole and on the larger GGNRA of which the Presidio is a part.

The Trust must be very wary of setting adverse precedents for the management of the National Park System.

The DEIS fails to look at the cumulative consequences of the Trust's process for the approval of development and renovation projects on the Presidio in light of the potentially serious ramifications of the Trust's actions on units of the National Park System nationwide. The Trust was created to address the particular difficulties of converting the Presidio from a military base to a national park, in light of the high costs of rehabilitating and maintaining the site's wealth of historically important but physically deteriorating structures and landscapes. No other park unit in the country is faced with such daunting restoration and maintenance responsibilities (GGNRA's much smaller Fort Baker conversion is perhaps the closest parallel). 47-9

The Trust must be very careful to emphasize the Presidio's unique situation at every opportunity to forestall any argument that its management should be seen as a model for other units of the National Park System. Perhaps the worst thing that could come out of the Presidio planning process is the idea that national parks everywhere should be made to pay their own way through the leasing and development of park resources for commercial and non-park-related uses. Unfortunately, no matter how careful the Trust is to emphasize the uniqueness of its charge, and its inapplicability as a model for other parks, there are those

who will look to and promote the Trust model as one to be applied widely. This is another reason for the Trust to be ever conscious of the potential precedential nature of its actions, decisions, and public process. It is also a compelling reason to place foremost the global-problem-solving, sustainability, and visitor-serving objectives of the GMPA -- goals that serve the *public interest* -- in each and every planning decision the Trust makes. If the Trust steadfastly makes its decisions about uses of the Presidio's resources based firmly on the extent to which these will make a positive contribution to the GMPA's vision of the Presidio as a national park, then concerns about setting negative precedents for other parks will be minimized. 47-9

Conclusion

The public process for the determination of the appropriate redevelopment and reuse of the Letterman Complex has unfortunately gone off the track that it should be on. While it will cause some delay in the short run, it would be far better for the future of the Presidio, and for ensuring the long-term public support essential to sustaining it as a national park, to take a few steps backward and conduct the process properly. Before any choice is made as to the ultimate tenant(s) and uses of the Letterman site:

- The vision and goals of the GMPA to make the Presidio a forum for addressing global problems and fostering sustainability should be acknowledged by the Trust as central to the Presidio's mission as a national park, and all use proposals should be analyzed for their ability to promote that vision.

- All redevelopment proposals for the Letterman Complex should be measured against the Trust's detailed Planning Guidelines for the Complex.

- The DEIS should be revised to include alternatives to the development of 900,000 square feet of structures on the 23-acre site that would allow the public to judge whether a lower level or a different configuration of development on the 60-acre Letterman Complex might better serve the environment of the Presidio as a national park. 47-10

- The DEIS should detail the financial assumptions, including the overall financial plan for the Presidio, that led the Trust to conclude that a 900,000-square-foot Letterman development was necessary to achieve financial self-sufficiency for the Presidio, and the Trust should accept and consider public comments regarding the reliability and advisability of the financial plan and assumptions.

- The DEIS should be revised to include site-specific analyses of the proposed Letterman Complex development's impacts on the biological resources of the Complex and surrounding areas, the hydrology of these areas, and the scenic vistas from surrounding areas of the Presidio, and analysis of the cumulative impacts of the Letterman Complex and other foreseeable Presidio renovation and reuse projects on the Presidio as a whole and, more broadly, on GGNRA.

Only after a revised DEIS that contains all of these features and information has been released and circulated for full public comment, and a final EIS released in response to that comment, will it be appropriate for the Trust to select and approve a Letterman development project.

Like most of the constructive critics of the Letterman development process, Tides wants to see the Trust succeed in implementing the vision of the GMPA for the Presidio and in securing financial self-sufficiency for the Trust, provided the latter goal can be attained without compromising the integrity of the Presidio as a unique national park. As an existing park partner deeply committed to the vision of the GMPA, we want to help the Trust succeed in its challenging mission. But in order for the Trust to succeed, it must gain the faith and support of the broadest possible public by making itself publicly accountable in all its decisions affecting the remarkable public asset entrusted to its care, and by inviting the public fully into its planning for the Presidio at the earliest possible stages. 47-10

Thank you for your attention to our comments. If you have any questions concerning any of the matters we have raised, please do not hesitate to contact me.

Very truly yours,

Drummond Pike

Drummond Pike
President

cc: GGNRA Advisory Commission
BJ Griffin
Brian O'Neill

Responses to Comments in Letter 47

47-1

Thank you for your letter. The responses to comments 47-2 through 47-9 below individually address each concern summarized in the comment. Please refer to those responses.

47-2

The Presidio Trust acknowledges the commentor's commitment to the implementation of the GMPA. The Trust has made clear its commitment to continue to use the GMPA as the foundation for its planning decisions. It is the master document which guides the Trust in decision-making. In some circumstances, as here, changed conditions or additional needs require the Trust to assess critically the best means to implement certain of the GMPA's site-specific plans or programs. Here, the Trust had a rational and legitimate purpose and need (Section 1.2 of the Final EIS) for proposing, as set forth in this EIS, to implement this 23-acre portion of the GMPA's Letterman Complex plan. It is not so substantial a departure from the GMPA as is so often characterized. For further response to the comment concerning the conformity of the Trust's decisions with the GMPA, refer to master responses 2A and 3A. For discussion of the Trust's complete decision-making context and purpose and need for the project as proposed in this EIS, refer to Section 1.2 of the Final EIS.

47-3

The comment is premised on the notion that each project undertaken by the Trust must singularly accomplish the goal of addressing environmental, social, and economic challenges. Given the complexity of the goal when viewed through the prism of the Trust Act, the GMPA cannot be viewed in such singular dimension. Therefore, for response to the comment concerning the extent of departure from the GMPA, refer to Section 1 of the Final EIS and to master response 2A. For response to comment concerning the inadequacy of the Trust's identification of and compliance with the General Objectives of the GMPA, refer to master responses 3A, 3B, and 3C. For response to the comment about the specific inadequacies of the preferred alternative, refer to response to comment 44-1.

47-4

For response to the comment concerning the conformity of the preferred alternative to the Planning Guidelines, refer to master responses 7A and 7B. For response to the comment about specific inconsistencies with the Planning Guidelines, please refer to the more exhaustive list and the discussion in response to comments 44-17 through 44-37. With regard to the comment that the preferred alternative's site plan is an exclusive campus, please refer to the responses to comments 44-16 and 44-17. Inconsistencies of each alternative with the Planning Guidelines are discussed in Sections 4.1.1 through 4.6.1 (Consistency with Approved Plans and Policies) in the Final EIS. Please refer to response to comment 33-2 for further discussion. With respect to consistency with the Planning Guidelines, please refer to responses to comments 15-2 and 33-3. For clarification, all of the alternatives in the Final EIS have been analyzed at an equal level of analysis.

47-5

For response to the comment concerning failure to examine a reasonable range of alternatives, refer to master response 6A. For response to the comment concerning the financial justification for a 900,000-square-foot

development, refer to Section 1.2.2 of the EIS and master responses 5, 10A and 10B. Further discussion of and justification for the range of alternatives selected for analysis is included in Sections 2.1 and 2.2 of the EIS. Consistency of the alternatives to the GMPA is discussed in Sections 4.1.1 through 4.6.1 of the Final EIS. Alternative 1 proposes a smaller footprint for new construction which could occur throughout the 60-acre complex.

47-6

For response to the comment concerning the availability of financial information and the financial justification for the project as proposed, please refer to master responses 5 and 10A and 10B and see the Financial Management Program in Appendix E of the Final EIS. In response to the comment concerning piecemealing of its reuse decisions, please refer to master response 4A.

47-7

For response to the comment concerning the apparent selection of a developer during the NEPA process, refer to master response 6B and the discussion at Section 5.2 of the Final EIS.

47-8

With respect to the comment concerning tiering, as was noted in response to comment 47-2, the Trust has made clear that it continues to use the GMPA as the master plan that guides the Trust's decision-making. Here, the Trust had a rational and legitimate purpose and need (Section 1.2 of the Final EIS) for proposing, as set forth in this EIS, to implement this 23-acre portion of the GMPA's Letterman Complex plan. It is not so substantial a departure from the GMPA as is so often characterized. It is therefore appropriate and consistent with NEPA to have tiered this EIS off the GMPA EIS. Furthermore, all differences between the GMPA concept and the purpose and need for this site-specific implementation proposal have been fully and adequately analyzed. For further discussion concerning the appropriateness of tiering, refer to master response 1D.

Concerning cumulative impacts, refer to master response 4B. Concerning the impacts on natural resources, and in particular, the palm trees and the hooded oriole, refer to master response 16. Concerning the impacts on hydrology, refer to master response 15. Concerning visual impacts, refer to master response 24.

47-9

The Trust agrees that the Presidio of San Francisco is a unique site that presents complex and sometimes competing objectives that require unique and innovative management authorities and solutions. For response to comment concerning the precedential effect of the Letterman project on other units of the national park system, refer to master response 8.

47-10

These concluding remarks are individually addressed in the responses to comments 47-1 through 47-9 above.

Letter 48

Urban Watershed Project

2532 Lake Street
San Francisco, California 94121
Phone 415.876.1804 Fax 415.876.1805
Email dkern@kernsite.com

August 2, 1999

NEPA Compliance Coordinator – Attn: Letterman Complex
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

PRESIDIO TRUST REC'D

Dear NEPA Compliance Coordinator:

Thank you for the opportunity to comment on the *"Draft Environmental Impact Statement for New Development and Uses within the Letterman Complex/; A Supplement to the 1994 General Management Plan Amendment Environmental Impact Statement for the Presidio."*

Our comments are targeted at potential impacts of the development project on Presidio natural areas, particularly the Crissy Field wetlands and the Tennessee Hollow Riparian corridor restoration project. If you have any questions regarding these comments please contact Doug Kern at (415) 876-1804.

Sincerely,

Doug Kern
President

Comments on Planning Guidelines

1 The planning guidelines are a useful and promising addition to the Letterman Complex DEIS. We are very pleased to note the numerous times that the Tennessee Hollow Riparian Corridor restoration project is mentioned in the document and the sensitivity shown the restoration project. Thank you. These considerations are appreciated. 48-1

2 Two general comments regarding these guidelines are: 1) it is unclear how they will be implemented and 2) there are apparent inconsistencies in the guidelines with respect to the planning around the Tennessee Hollow Riparian Corridor. 48-2

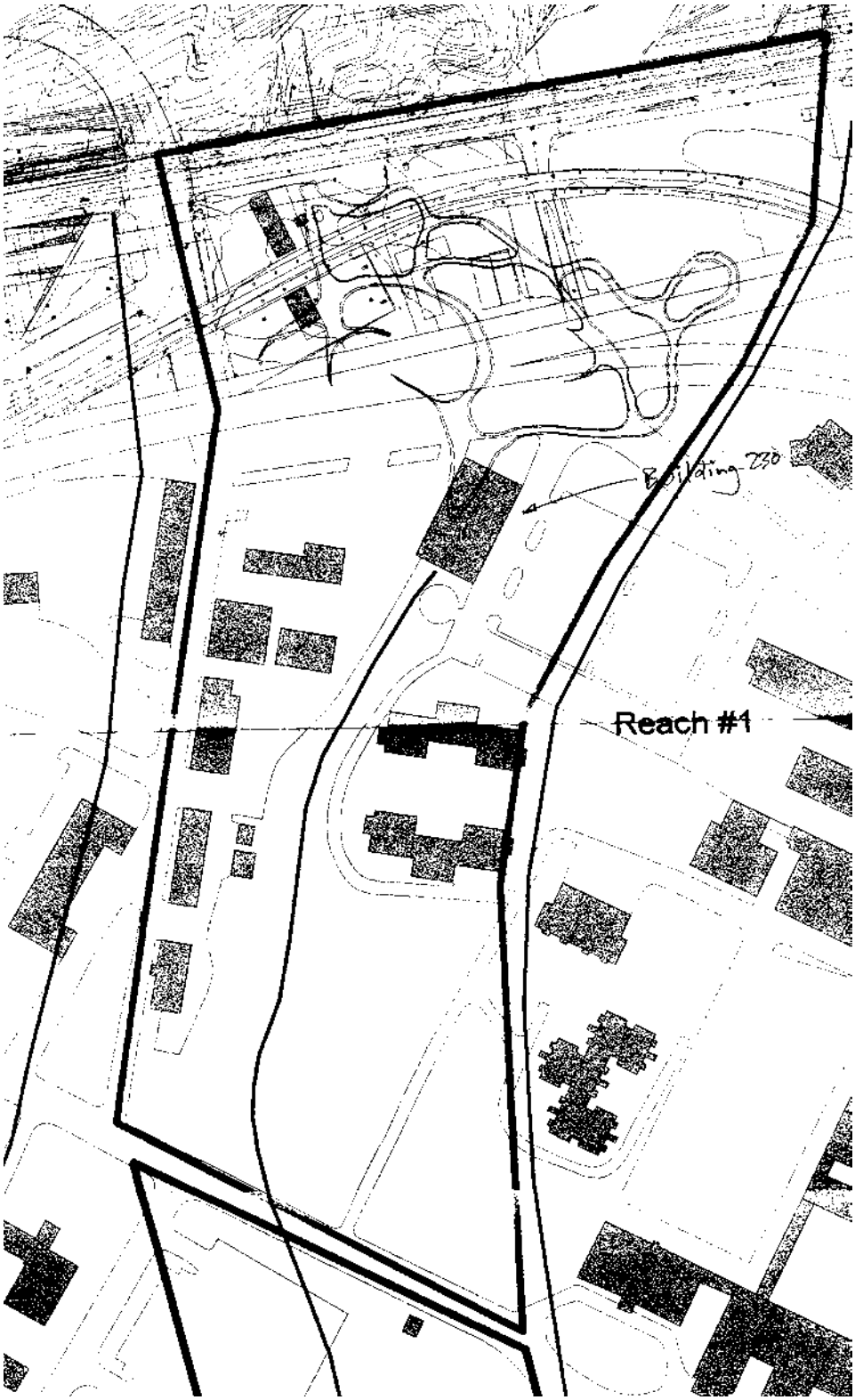
3 Figure B-12 is quite consistent with drawings and ideas submitted to the Trust by the Urban Watershed Project in earlier briefings regarding potential planning for Tennessee Hollow. We include a diagram showing our concept of the Tennessee Hollow planning area near the Letterman site for your review as Exhibit 1. The large arrow in Figure B-12 nicely represents the historical alignment of the creek with a reasonable buffer zone around that creek. However, Figures B-15, B-29 and B-31 show areas for potential building infill. Figure B-29 shows the Tennessee Hollow alignment superimposed over the building infill diagram and the caveat of sensitive treatment along Tennessee Hollow. These are confusing and conflicting messages in these diagrams that give the reader the impression that building infill will take place in the riparian corridor. Building infill in the riparian corridor could dramatically impede future efforts to establish a fully functioning watershed ecosystem with quality habitat supporting native plants and animals, an idea supported by the National Park Service, the Presidio Trust and community members. We strongly urge the Trust to restrict future building infill within the corridor restoration planning area and to plan to remove buildings in the future (such as Buildings 1029 and 1030) when leases expire. We recommend that these restrictions be included in the planning guidelines. 48-3

4 Figure B-36 shows a Tennessee Hollow "edge" that is confusing and inconsistent with other Tennessee Hollow diagrams. The drawing should show an "edge", if an edge is necessary, that is outside the creek alignment and riparian habitat buffer zone. 48-4

5 The planning guideline drawings should clarify the status of Building 1029 and 1030. They are often shown in dotted outlines, which may be interpreted as buildings to be demolished. We suggest that demolition is our recommended preferred status of Buildings 1029 and 1030, but understand that these buildings have been leased for a period of 10 years with an option to renew for 10 additional years. We suggest that the document reflect this leased status and reserve the right to remove these buildings at a future date. 48-5

6 The diagrams in the planning guidelines do not show Building 230. Building 230 is located north of Buildings 1029 and 1030. This building now houses artifacts retrieved from Crissy Field archeological work. It lies in the Tennessee Hollow Riparian corridor planning area and should probably be included for completeness in all planning guideline diagrams. 48-6

Exhibit 1



Responses to Comments in Letter 48

48-1

Thank you for your letter. The comment is noted and no further response is warranted.

48-2

The Planning Guidelines and later Design Guidelines would be used to help shape the final project. To this end, they are intended to provide guidance for projects within the entire 60-acre complex, including those that would occur after the current environmental review process for the 23-acre site is concluded. For example, the Final Planning Guidelines, once incorporated into the Design Guidelines now under development, would be utilized in planning and design for the restoration of Tennessee Hollow. The apparent inconsistencies in the Draft Planning Guidelines noted by the commentor were the result of confusing graphic representations. In response to the comment, the graphics in the Final Planning Guidelines have been amended to help avoid contradictions or inconsistencies. Please see master response 7A.

48-3

The figures mentioned by the commentor have been changed to remove the references to infill construction. In both the Final EIS and the Planning Guidelines, text changes have also been made to clarify this issue. Infill construction is expected only for Alternative 1 in the Final EIS, and only in those areas indicated in Figure 4. This infill is located in such a way as to avoid impacting the future riparian corridor restoration.

48-4

The Tennessee Hollow "edge" shown in this diagram is not referring to a building edge, but instead addresses landscape and site treatments that might be planned. The intent of this drawing was to indicate that low-intensity uses are appropriate along Tennessee Hollow with minimal paving.

48-5

Table C-1 in the Draft EIS identifies buildings 1029 and 1030 as non-historic buildings. The GMPA called for their retention and rehabilitation for dorm-type uses. Any proposals for their demolition would be subject to additional environmental analysis.

48-6

In response to the comment, building 230 has been added to the figures in the Planning Guidelines.

Letter 49

WESTERN OFFICE

NATIONAL TRUST
FOR HISTORIC PRESERVATION

TRUST REC'D

August 2, 1999

NEPA Compliance Coordinator
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, California 94129-0052

By Facsimile

Re: Comments on Letterman Complex Draft EIS

Dear Sir or Madam:

On behalf of the National Trust for Historic Preservation, we wish to submit the following specific comments on the Draft Environmental Impact Statement (DEIS) regarding the development of the Letterman Complex. These comments are in addition to the more lengthy and detailed comments that we are submitting jointly with the Natural Resources Defense Council, the National Parks and Conservation Association, the Wilderness Society, the Sierra Club, and the San Francisco League of Conservation Voters. 49-1

We believe that the EIS and the planning process that led to it are flawed and that the most effective means for correcting these problems is to issue a new RFQ consistent with the goals of the Planning Guidelines as well as a new or Supplemental Draft EIS.

The General Objectives adopted by the Presidio Trust do not recognize the historic significance of the Presidio. The great efforts to ensure the preservation of the Presidio over the last three decades were in recognition of its natural, cultural and **historic** significance. The four general objectives that the Presidio Trust adopted by resolution and included in the Draft EIS omit any reference to the site's more than two hundred year history. The Presidio is a National Historic Landmark, a designation reserved for sites of the highest level of historic significance in our nation. While the Presidio is a site of unparalleled beauty, it is its history as a military installation dating to the Spanish and Mexican periods that renders it such an important national site. In addition, by qualifying the first objective with the phrase "where appropriate" the Trust appears to give itself broad discretion in its responsibility to preserve and enhance the resources that make the Presidio such a special place. 49-2

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The National Trust also objects to the adoption of these objectives without any opportunity for public input. These general objectives will guide the Presidio Trust's decision making about development throughout this public site, and, as such, should reflect the public's interest. 49-2

The size of the development site is unduly constrained. We continue to question to the definition of the development site as only 23 acres, rather than the full 60 acres that historically has comprised the Letterman site. To split the site for this proposal imposes significant, arbitrary, and undue constraints on the ability to design the redevelopment in a sensitive manner and to minimize its impact on historic and environmental resources. The Letterman site should be considered as a whole. 49-3

The Draft EIS fails to evaluate the impact of the project on the Presidio as a whole. In addition, the EIS offers no discussion of how this development project will affect the larger 1,480-acre Presidio. The Presidio in its entirety is a National Historic Landmark. What happens in one portion of the site, especially such a focal entry point, has implications for the remainder of the site. The Draft EIS does not consider the cumulative effects of this proposed development on the Presidio as a whole, especially other existing uses and potential new uses within the Presidio. 49-4

The Draft EIS does not adequately evaluate impacts on historic and cultural resources. The DEIS is deficient in several respects concerning impacts to historic and cultural resources. The Draft EIS does not fully consider adverse effects on historic and cultural landscape features at the Presidio. For example, the Draft EIS asserts that the preferred alternative would "block the existing and historic view corridors at Edie Road and Torney Avenue," DEIS at 166, but "modifications to be made during design review" would nonetheless retain the historic view corridors after all. We seriously question whether the proposed development can be modified sufficiently to avoid this adverse effect. In any event, the EIS does not provide sufficient information either in text or visuals to assess the visual impacts of the alternatives on historic properties and views. The majority of historic resources within the 60-acre Letterman site lie northwest of the 23-acre project site. The look and feel of historic O'Reilly Avenue and the row of historic buildings that line it, as well as the Thoreau Center site, will clearly be impacted adversely by the adjacent 900,000 square-foot development. The sheer bulk of the new development is sure to affect the character of the historic Letterman complex. Without the aid of simulated photographs or other visual depictions it is impossible to determine or evaluate the degree of those impacts and whether the 85-foot buffer proposed along O'Reilly Avenue will be adequate to mitigate that impact. In addition, photographs of the historic view corridors for the site, and visual depictions of how those views will change under different alternatives, should be included to assist in this evaluation. 49-5

The Draft EIS also asserts that "historic drainage patterns and features would be preserved and reused whenever possible, " DEIS at 118,166, but gives no indication of the extent to which that may or may not be possible under the preferred alternative. In addition, the DEIS states that significant landscape features outside the 23-acre site but

within the 60-acre Letterman complex "would be rehabilitated and preserved in the process of making changes to accommodate new uses." ID. However, the document does not identify what these landscape rehabilitation projects or new uses may be, and there fore, it is not possible for the public to evaluate this vague reference to potential mitigation.

The reconfiguration of the Gorgas/Richardson access routes is likely to impact historic resources in ways that have not been evaluated. For example, the new Gorgas exit appears to be intended as the primary departure point for all employees from the Letterman complex and nearby areas of the Presidio. This new right-of-way would cut right through the historic complex of industrial buildings. Buildings 1170, 1160, 1152, and 1151 are in very close proximity to the new reconfigured routes. Yet the Draft EIS fails to evaluate any potential impacts to these historic buildings from the significant increase in vehicular access. The Draft EIS needs to evaluate not only the impact on users of those buildings (including the YMCA), but also any possible negative impacts to the buildings themselves from such close proximity of the new exit road. 49-5

The Timing of the Planning Guidelines is Problematic. Although we generally support the Planning Guidelines for the Letterman site, the respondents to the RFQ for this project did not have the benefit of those Guidelines when developing their responses. Thus the value of the Guidelines has been substantially lost by failing to incorporate them into the development process from the outset. In our view, this timing problem is largely responsible for the result that none of the alternatives is consistent with the Guidelines. Indeed, the preferred alternative is the *least* consistent with the Guidelines. 49-6

The Preferred Alternative is Not Consistent with the Planning Guidelines for the Letterman site. The project alternatives presented in the Draft EIS do not meet the Guidelines. For example, the cultural landscape section of the Guidelines calls for a "human scale design," and further warns against development that is "exclusive" or "gated." A development of three buildings 60 feet in height and totaling 900,000 square feet does not evoke human scale design, especially when compared to the residential-scale of the adjacent O'Reilly Avenue streetscape. In addition, the preferred alternative for the 23-acre site calls for one private business use, which does appear exclusive.

The Guidelines also provide that new construction is to be compatible with the existing historic architecture on the site. DEIS at B-35. Although it is not possible to evaluate the specific architectural features of the proposal, the very mass and bulk of the new development appears incompatible with the existing historic properties, especially those in the adjacent portion of the Letterman complex. 49-7

The Guidelines also encourage opportunities to interpret the historic Letterman site, yet the preferred alternative fails to address this issue. New development at the site provides an excellent opportunity to incorporate an interpretive program into site planning. There are numerous resources already at the Presidio that could be helpful in

this regard. The National Park Service and the Fort Point and Presidio Historical Association are two primary contacts.

Many other specific inconsistencies with the Planning Guidelines are detailed in the longer joint comment letter submitted today by the National Trust and other national environmental groups. Although the Presidio Trust has stated its intention to work with the selected developers to ensure compliance with the Planning Guidelines, it is difficult for us to see how a proposal so fundamentally incompatible with the Guidelines could be modified sufficiently to be made consistent with them. 49-7

The NEPA process is tainted by the public perception that a developer has already been selected. The media coverage of the exclusive negotiations with Lucasfilm has created a strong public perception that the Presidio Trust has already made a decision on the selection of a developer for this project and that the NEPA process is merely and after-the-fact exercise in paperwork. In our view, the only way to resolve the substantial problems with the Draft EIS for this proposed project is to issue a new RFQ that emphasizes consistency with the Planning Guidelines, and to prepare a new Draft or Supplemental Draft EIS for the project, based on the entire 60-acre Letterman complex. 49-8

We appreciate your consideration of the National Trust's views on this highly significant project.

Sincerely,

Courtney Damkroger
Acting Regional Director

cc: Natural Resources Defense Council
National Parks and Conservation Association
California Office of Historic Preservation
California Preservation Foundation
San Francisco Heritage
Fort Point and Presidio Historical Association

Responses to Comments in Letter 49

49-1

Thank you for your correspondence. The EIS has been prepared in full accordance with the policies and purposes of NEPA, and meets the standards for an adequate statement under the Act.

49-2

The Trust fully recognizes the historic significance of the Presidio (see Section 1.4 of the Final EIS). For response to the comment concerning the process for identifying and adopting the General Objectives of the GMPA and the recognition in the General Objectives of the historic significance of the Presidio, refer to master responses 3A and 3C.

49-3

For response to the comment concerning undue restraint of the development site to 23 acres rather than 60 acres, refer to master response 4A and Section 1.2.2 of the Final EIS. Refer also to Section 1.3 of the Final EIS and master response 6A.

49-4

Additional text in the cumulative impact discussion for cultural resources has been incorporated into the Final EIS to address these concerns. Please refer to master response 4B. It is assumed that development activities within the balance of the Presidio would be consistent with those put forward in the 1994 GMPA. The Programmatic Agreement between the Presidio Trust, SHPO, ACHP and NPS regarding undertakings within the Letterman Complex is included in Appendix F of the Final EIS. This agreement will be the vehicle for further assessing effects of undertakings at Letterman on the Presidio National Historic Landmark.

49-5

New text has been added to the Final EIS to further analyze the effects of each alternative on the historic setting and the National Historic Landmark district. In addition, to address concerns that the EIS does not adequately evaluate the visual impacts on historic properties and views, new text and graphics (Figures 20 – 24) have been added to the analysis of each alternative in Section 4 to discuss the effect of adding new construction on visual resources of the Letterman setting. Please refer to master responses 23 and 24 with regard to effects on the historic setting, including O'Reilly Avenue, and visual resources.

The O'Reilly Avenue buffer (O'Reilly Common) would be a linear open space of 85 feet in width. A distance of 125 feet would be maintained from the face of the historic O'Reilly Avenue buildings to the face of the new construction. The final building mass and bulk would be carefully studied and refined during the design review process. See master responses 7A and 7B for further discussion on compliance with the Planning and Design Guidelines. Photographs of the historic view corridors both before and after implementation of each alternative are not included in the Final EIS. Text is provided in Section 4, Environmental Consequences, as mentioned above. This type of visual analysis would be considered in the subsequent planning and design review process to ensure the proposal's visual compatibility with the historic setting and the Planning Guidelines (see master response 24).

Regarding the comment about historic drainage patterns and features, please refer to the response to comment 44-28. Design details for the preferred alternative would be refined through design development and review as mentioned above. Alternatives 2 through 5 focus on actions within the 23-acre site; projects and rehabilitation activities outside of the 23-acre site would be subject to subsequent environmental analysis. And the Planning Guidelines would be used to direct these site improvements in the broader 60 acres.

Effects upon the historic resources have been included in the analysis of the Final EIS. With regard to the comments on the Gorgas Avenue/Richardson Avenue access routes and effects on the historic road corridors and buildings, please refer to master responses 18, 22 and 23. Additional text has been added to the Final EIS in Section 4, Environmental Consequences, to address these concerns, including effects on the individual buildings.

49-6

Please see the response to comment 44-13. The Trust disagrees that the value of the Planning Guidelines has been lost; they remain relevant for the duration of the design development and review process, a process that begins once the EIS is completed. Regarding the preferred alternative's consistency with the Planning Guidelines, please refer to master response 7A. With regard to future design and the review process as relates to the Guidelines, please see master response 7B. See also Section 1.4 of the Final EIS.

49-7

With regard to the alternatives' consistency/inconsistency with the Planning Guidelines, please refer to master response 7A. The Trust believes that the alternatives largely meet the recommendations put forth in the Guidelines, but has included additional analysis in Section 4, Environmental Consequences, of the Final EIS to identify inconsistencies with the Guidelines. Analysis of proposed building massing and scale has also been added to Section 4 for each alternative. Please refer to master response 24 for further discussion of massing, scale, and visual analysis. Please refer to master responses 7A and 7B for further discussion on applicability of the Planning Guidelines and design guidelines.

The Presidio Trust concurs that opportunities for an excellent interpretive program at the Letterman Complex are available. See master response 25. Text has been added to the Final EIS to elaborate upon visitor experience opportunities for each alternative. The Presidio Trust does not agree with the assertion that the preferred alternative is "fundamentally incompatible" with the Planning Guidelines and could not be modified to be more consistent with them. Please refer to mitigation measure CR-1, *Planning and Design Guidelines*.

49-8

For response to concerns that a developer was selected during the NEPA process, refer to master response 6B and Section 5.2 of the Final EIS.

Letter 50

WILD BRAIN™

2650 18th Street San Francisco, CA 94110

REC'D

August 2, 1999

Mr. John Pelka
NEPA Compliance Coordinator
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

Re: Letterman Digital Center

Via Fax #415.561.5315

Dear Mr. Pelka:

I am writing to support the Letterman Digital Center at the Presidio and to comment on how the Center will help the Presidio meet the objectives of its General Management Plan.

As I understand the requirements, Presidio tenants must contribute to these objectives in the areas of community service, the arts, education, research, innovation and communication. I believe the Presidio made a wise choice in selecting the Lucas companies. All of the companies scheduled to move to the Letterman Digital Center have long histories of making significant contributions in these areas.

Wild Brain is an award-winning animation studio that both competes with and is an ally of the Lucas companies. As such, we have seen how the Lucas companies have helped make the San Francisco Bay Area the worldwide center for digital entertainment production. All industries rely on local talent pools and the Lucas companies have trained a number of our core employees, including myself and one of our founders. As we (and other companies like us) grow, we depend on the advances and people that result from the type of investment and training that the Letterman Digital Center will provide. It is not surprising that the Lucas companies have spawned many local companies, like ours, with the same goal—the production of high-quality work using state-of-the-art technology. 50-1

The Letterman Digital Center will attract other vendors and will support further industry growth. The base of local resources here in the Bay Area does not approach those of Hollywood. If the full potential of digital production is to be realized for San Francisco and the Bay Area, there needs to be investment on the scale of the Letterman Digital Center.

Training and infrastructure investment is vital to the future of the digital revolution. Pioneers like the Lucas companies can help give the Bay Area a boost toward becoming the digital entertainment center of the future.

Sincerely,

Jeffrey C. Ulin
CEO

Response to Comment in Letter 50

50-1

Thank you for your correspondence. The organization's support of the Letterman Digital Center is noted for the record.

Letter 51

FILM INSTITUTE OF NORTHERN CALIFORNIA
Mill Valley Film Festival · Rafael Film Center · Outreach & Education

Founder/Executive Director
Mark Fishkin

Board of Directors
Stewart Bazar
Ann Brebner
Rita Cahill
Mark Cazenave, II
W. Robert Griswold, Jr.
Nancy Hudson
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Philip Schaefer
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James Broughton
Mark Fishkin
Sidney Gantz
Gary Meyer
David Meyers
Gordon Radley

Founding Board
Mark Fishkin
Rita Cahill
Lois Cole

August 2, 1999

Mr. John Pelka, NEPA Coordinator
Attn: Letterman Complex - Presidio Trust
P.O. Box 29052
San Francisco, CA 94129-0052

FAX (415) 561-5315

Dear Mr. Pelka,

I enthusiastically add my vote of support for Lucasfilm and the exciting new Letterman Digital Arts project. We have found it an honor and a pleasure to work with this award winning and industry respected company who is committed to the moving image as an art form.

Lucasfilm has been an international flagship for innovative creative expression for film and the digital arts.

The Lucas vision for the Presidio will attract individuals and companies who want to be on the forefront of new media technologies while providing a cornerstone for the burgeoning network of national and Bay Area new media businesses. I've attached an article that recently appeared in the *LA Times*. I thought the author was quite articulate in captivating the importance of Letterman Digital Arts not only to the Bay Area but also to the industry at large. 51-1

For over a decade the Film Institute of Northern California has received multi-level support from the Lucasfilm organization. Lucasfilm has generously invested time, expertise, equipment and dollars to support the Film Institute of Northern California (including its projects: Mill Valley Film Festival - Rafael Film Center - Outreach and Education) and other developing arts organizations.

There can be no better example of corporate commitment to quality, artistic vision or the future, than the Lucas organization.

Thank you for your time.

Sincerely,

Mark Fishkin
Executive Director

38 Miller Avenue, Suite 6
Mill Valley, California 94941

tel: 415-383-5256
fax: 415-383-8606

e-mail: finc@well.com
web: www.finc.org

Response to Comment in Letter 51

51-1

Thank you for your correspondence. The organization's support of the Letterman Digital Center is noted for the record.

Letter 52

SAN FRANCISCO FILM SOCIETY

Presenter of the San Francisco International Film Festival

1521 Eddy Street
San Francisco, CA
94115-4102
Tel: 415-929-5000
Fax: 415-921-5032
sfiff@sfiff.org
www.sfiff.org

August 2, 1999

NEPA Coordinator
Mr. Pelka
ATTN: Letterman Complex
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129

BY FAX: 561-5315

1 page(s), including this one

Dear Mr. Pelka:

I write in support of the Letterman Digital Arts proposed development for the Presidio.

As the Executive Director of the San Francisco Film Society, presenter of the San Francisco International Film Festival, I have seen the contribution that Lucas companies have made to the arts in the Bay Area. Their success has helped make the Bay Area an increasingly powerful force in the film world. At the Presidio, they will lead the way in creating a dynamic hub of artists and technicians that will benefit not only the Presidio community and the city of San Francisco, but the entire Bay Area, by shifting the focus from Hollywood to San Francisco for new film technology. 52-1

The Lucas companies have an outstanding reputation for responsible community participation. As a future tenant of the San Francisco Film Centre at the Presidio, we at the Film Society are eagerly anticipating working with Lucas Digital Arts in a way that will benefit other Presidio tenants, the film arts and the public.

We are excited to be a part of the development of a unique urban park, and we know that Lucas Digital Arts will make a strong contribution to an enhanced visitor experience at the Presidio and interact in a very positive way with the community. Thank you for your consideration.

Sincerely,

Amy J Leissner
Executive Director

cc: Melanie Blum
BY FAX: 561-2244

Response to Comment in Letter 52

52-1

Thank you for your correspondence. The organization's support of the Letterman Digital Center is noted for the record.

Letter 53

Sierra Club Loma Prieta Chapter

c/o Gail Sredanovic
2161 Ashton Ave.
Menlo Park, CA 94025

The Presidio Trust
NEPA Compliance Coordinator -- Attn: Letterman Complex
Presidio Trust
34 Graham Street
San Francisco, CA 94129-0052

RE: Presidio DEIS

Dear Trustees: The Loma Prieta Chapter of the Sierra Club is greatly concerned about the DEIS and the proposed plans for the Presidio.

A. The public process for making decisions for the Presidio has been inadequate.

• Many decisions are being made without the public having access to the underlying information upon which these decisions are based. The financial details on which plans are based for the Presidio have not been adequately disclosed to the public. Added to these deficiencies, on 7/23/99 we called the Trust office to request that a copy of the budget be mailed to us. The response was that it was necessary to personally come to the trust office which is located in San Francisco, weekdays between 8 am and 5 pm. This places an undue burden upon the public seeking information. 53-1

• In other cases, the necessary underlying information has not apparently been developed or is not planned to be. There are no surveys for the flora and fauna. Scientifically adequate surveys need to be completed. The information to determine the impact of the five alternatives in the DEIS on the natural environment is not provided. 53-2

• Other decisions are being made before public input is even completed. The Trust has apparently engaged in exclusive negotiations with Lucas Films regarding the Letterman site even before the end of the public comment period. 53-3

B. Negative impact.

• We are greatly concerned that the flaws in the process and deficiencies in the DEIS will lead to negative impacts on the natural environment in the Presidio. It appears that planning is being driven by a planning/development/commercialization mind set as opposed to being driven by concerns for the natural environment. This is exemplified in the DEIS by the lack of adequate scientific studies and surveys of the existing flora and fauna of the Presidio and studies and measures to protect them. In addition, there should be studies to review restoration of native vegetation and mitigation of possible invasion by exotic plants and weeds which might disrupt the environment due to the new construction and due to additional impacts from traffic and noise. 53-4

• The uses to which the buildings will be put may not be congruent with the goals of the National Park Service or the public good. This is after all public land. 53-5

C. Decrease in structures and impacts. We agree with restoration of existing buildings but not with the current emphasis on new construction which is not congruent with the concept of a National Park. In fact we would urge the Trust to significantly decrease the total number of buildings, their total footprint and their total square footage. 53-6

Sincerely,

Gail Sredanovic and Joyce Eden on behalf of the Sierra Club Loma Prieta Chapter

Responses to Comments in Letter 53

53-1

Thank you for your letter. Please see Section 5.1 of the Final EIS. In addition, the commentors are referred to the FMP in Appendix E of the Final EIS. The FMP and the Presidio Trust's annual budget are available for review in the Presidio Trust's library at 34 Graham Street (open weekdays and Saturday morning), and on the Presidio Trust's website (www.presidiotrust.gov). The Presidio Trust regrets that the commentors were given inaccurate information. Please refer to master responses 5, 10A, and 10B.

53-2

Refer to master response 16.

53-3

For response to comments concerning the apparent selection of and negotiation with a developer before completion of the NEPA process, refer to master response 6B.

53-4

The Presidio Trust disagrees with the commentors. There are no flaws in the process or deficiencies in the EIS that would lead to significant adverse impacts on the natural environment. Planning and decision-making for the Letterman Complex is being guided by environmental considerations integrated with economic and technical considerations to meet the requirements of the Trust Act and NEPA. The efficient collection and effective use of quality baseline data and surveys lead to the development of design and mitigation measures to avoid impacts on the natural environment (see master response 16). Additional studies of native vegetation are not required because effects were found to be insignificant. However, a detailed landscaping plan would be prepared as required by mitigation measure NP-1, *Landscaping Plan*, to maximize opportunities for native habitat enhancement. Disturbed areas would be revegetated and stabilized as soon as possible after grading or construction to address erosion control and possible invasion by exotic plants and weeds in accordance with the Storm Water Pollution Prevention Plan and the Vegetation Management Plan.

53-5

The comment is noted for the record. For further response, refer to master responses 1A and 2A.

53-6

The GMPA, which serves as the Trust's foundational planning document, sets forth a varied mix of preservation, rehabilitation, demolition, and new construction. Because it was not known whether the specific use identified in the GMPA for the Letterman Complex could be satisfied or a specific user found, the GMPA left open the possibility of new replacement construction of the LAMC facility, subject to further environmental analysis as has been completed in this EIS. With new construction being limited under the GMPA to developed areas and significant constraints on the amount of new construction allowed in other planning areas, the 23-acre site had by far the largest potential for new replacement construction, and therefore, consistent with the need to located the project at a site with the essential characteristics for financial success — to serve as the economic engine for other rehabilitation, preservation, and demolition projects at the Presidio — this proposal involves significant new replacement construction. Please also refer to the discussion of this project's purpose and need in Section 1.2 of the EIS.

Letter 54

NEPA COMPLIANCE CO-ORDINATOR
Attn: Letterman Complex
Presidio " Trust "
34 Graham St.
P.O. Box 29052
San Francisco, CA 94129 – 0052

Dear Sirs,

I, as a private citizen, wish to formerly object in the strongest possible manner, officially, to the present publicly announced plans for the " re- use " of the Presidio of San Francisco. As a citizen of the United States I also object to the creation of the " trust " as presently constituted.

This land, indeed ALL land, is sacred. Particularly, this land must not be subject to that peculiar phenomenon known as " Development ". Human activities to reform nature, intentionally, are circumspect. The land and the structures which are presently sited in this former Army base are a part of a whole.

This San Francisco region is unique in that an urban metropolis benefits from a close proximity to nature. The Golden Gate national recreation area serves as model of successful land use. This is due to the wise provision for the strict attention to the ecology which the law formerly provided.

The " trust's " intentions to alter the landscape is perhaps the most foolish and dangerous precedent imaginable.

The proper and necessary purpose to which this land MUST be turned to is as an institute for Global Reforestation and Natural Wisdom. The upkeep of the structures can be accomplished through the solicitation of Universities throughout the country to create a " trust " in the actual meaning of a Public Trust organization.

The present plans of the Presidio " Trust " are founded on an absurd premise; namely, that nature must " pay its own way ". The Presidio of San Francisco is land which has been carefully husbanded for over two centuries. Until the present, human habitation has been beneficial. 54-1

The future of the Presidio of San Francisco may be the most important single issue in this nation. The Present situation, both nationally and globally, which has been created by " the new world order " "economy ", has vastly accelerated the destruction of the natural world and the mis-use of productive lands.

Farm prices, lumbering, the wise use of science, energy generation and renewable energy in the future, trade, human and indigenous rights, democracy, and climactic change, are not separate or discrete matters. Indeed, the traditional assumption that nature and the natural world can be divided and changed with-out consequence has become increasingly more questionable during the present decade.

The Presidio is presently ideally suited to the creation of a seasonal conference for the mutual exchange of knowledge and for generating public responsibility for the status and use of land in the United States. Each of the many small structures should be the responsibility, financially, of a particular university or organization. During the summer months, students and other persons may attend to studies and other activities which will attend generally to sustaining natural balance and human well being upon land, and in regard to sustainable prosperity.

The Letterman complex must be preserved. Indeed, this property is not dangerous structurally or otherwise below standard. The intention to " demolish " this structure, at the public's expense, is unconscionable. The mere removal and disposition of the rubble IS an environmental danger.

The intentions to remake the landscape of the Main Post such that some intense form of commerce will ensue is unconscionable. The carbon monoxide produced by vehicles is an anathema to all forms of animal life.

The waste water produced is intended to be carried to the overburdened S.E. Treatment plant; essentially dumped on the poor. The odors produced presently from this facility are increasing and the out-flow to the Bay is seriously damaging the eco-system and the fisheries.

The creation of an Environmental Conference center is the wisest choice. The Letterman Complex is essential as an administrative building, computer center, and as a center for communications and data storage. 54-1

The structure at 14th Av. and Lake St. will serve very well as a permanent lecture and scholastic center. The professorial staff may be housed in the former army housing nearby to this structure.

The Exploratorium is ideally situated to the function of teaching and demonstrating the priciples of science, as well as the practical limitations of science.

As a low intensity " university ", the Presidio will probably generate more income, goodwill, spiritual benefit, and tourism than the present scheme could possibly imagine. The re-use of this land in the manner which I suggest is essential to the future of this nation.

Please Reply,

Bryan Foster
2135 Hayes Street
San Francisco, CA
94117

August 2, 1999

Response to Comment in Letter 54

54-1

Thank you for your correspondence. Please refer to Section 1.3 for a discussion of the purpose and need for the project. The commentor's objections to new development at the Presidio and to the Presidio Trust are noted for the record. The impacts on regional solid waste facilities, air quality and wastewater facilities alluded to in the letter are discussed in Section 4 (Environmental Consequences) and Appendix A (Revised Environmental Screening Form) of the EIS. No further agency response is warranted.

Letter 55

COALITION FOR SAN FRANCISCO NEIGHBORHOODS

P. O. Box 42-5882 San Francisco, CA 94142-5882

President
Joan Girardot (415) 346-5525
Vice President
John Bardis (415) 776-2014
Treasurer
Mary McAfee (415) 387-2920
Recording Secretary
Lorraine Lucas (415) 759-8582
Corresponding Secretary
Al Lewis (415) 584-1271

Buena Vista Neighborhood
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Friends of Noe Valley
Glen Park Association
Golden Gate Heights Neighborhood Association
Golden Gate Valley Neighborhood Association
Greater West Portal Neighborhood Association
Inner Sunset Action Committee
Laurel Heights Improvement Association
Liberty Hill Neighborhood Association
Marina Civic Improvement & Property Owners Assoc.
Miraloma Park Improv. Club
Mission Creek Harbor Assoc.
New Mission Terrace Improvement Association
Nob Hill Urban Neighbors
North Beach Neighbors
North of Panhandle Neighborhood Association
Oceanview, Merced Heights, Ingleside - Neighb. in Action
Pacific Heights Residents Association
Panhandle Residents Organization
Potrero Boosters Neighborhood Association
Richmond Community Association
Russian Hill Improvement Association
Russian Hill Neighbors
SOMA Residents Association
Sunset Heights Association of Responsible People
Sunset-Parkside Education & Action Committee
Telegraph Hill Dwellers
Twin Peaks Council & Open Space Conservancy
West Presidio Neighborhood Association

August 2, 1999

VIA FAX TO: 415-561-5315 9 PAGES

NEPA Compliance Coordinator
Attn: Letterman Complex
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

Dear Coordinator,

This letter submits comments on the Draft Supplemental Environmental Impact Statement (DSEIS) for the Letterman Complex on behalf of the Coalition for San Francisco Neighborhoods, representing 35 neighborhood associations geographically based throughout San Francisco. Our member, Marina Civic Improvement & Property Owners Association, is the immediate adjacent neighbor to the Letterman Complex.

Vision and Concept

The vision of the 1994 GMPA for the Letterman site is very different from what is envisioned today in Alternatives 2-5 of the DSEIS.

"The Letterman complex will be devoted to issues of health, life and earth sciences." (GMPA p.vi) "The Letterman complex will continue to be used to nurture ideas and support research and actions to improve human and environmental health." (p.72) "In keeping with the Presidio vision, the Letterman complex will be dedicated to scientific research and education focusing on issues of human health." (GMPA p.72) 55-1

* Please reconcile the Lucas Digital Arts proposal for 836,000 sq. ft. of commercial office space and 60,000 sq. ft. of retail/archive with the GMPA vision for the Letterman complex.

* Since the Preferred Alternative differs vastly from the management plan for the Letterman site developed by the Park Service and embraced by the public, please discuss why an amendment to GMPA, proposing the Trust's new management plan and new vision for the Letterman complex, was not prepared and circulated for public comment prior to the release of the Letterman Request for Proposals. 55-2

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* The DSEIS for Letterman lacks any assessment of the impacts of the Letterman alternatives on other parts of the Presidio, its natural resources, and future development. Please provide such an assessment in your response. 55-3

* The DSEIS also lacks any assessment of the impacts of the development proposals for Letterman on the neighboring Marina District. Please provide such an assessment in your response. 55-4

* The DSEIS further lacks any assessment of the impacts of the preferred alternative on the financial future of the Presidio Trust and any discussion of the financial implications for the Presidio National Park of a long-term (up to 99 Years) land lease which would encumber park resources in private hands for possibly many years beyond the existence of the Trust. Please clarify what would happen to the Letterman complex if the Trust fails to be financially self-sufficient by 2013 and a long-term land lease has been signed. 55-5

Purpose and Need

There is no public mandate for massive new construction in the Presidio National Park, as proposed by the Preferred Alternative 5 for the Letterman Complex.

The DSEIS states: "The proposed project is needed to achieve the Presidio Trust Act's mandate that the Presidio Trust be financially self-sufficient by 2013." (DSEIS p.iii) 55-6

* This is a naked conclusion, not a description, much less an alternatives analysis under NEPA. Please present supportive documentation and discussion which warrants this conclusion.

* Please present an analysis of the impact to Trust finances if the Letterman site were not developed. 55-7

* Please reconcile the statement that the project is "needed" to achieve financial self-sufficiency for the Trust with the following observations:

A casual analysis of income able to be generated from existing residential leasing alone reveals that the entire operating costs of the Presidio in the year 2013 ($35.7 million in FY 1998 dollars) can be achieved without development of the Letterman site. 55-8

The Financial Management Program Report to Congress 7/8/98 states (p.13): "Housing rents will be market-based." At the present time, there are 1119 units of housing at the Presidio, most of it multiple-bedroom family housing. At the present time, in the Presidio's surrounding neighborhoods, one-bedroom apartments rent for an average of $2,000 per month. Two and three bedroom flats rent for an average of $3,000 per month.

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Assuming all existing Presidio units were one-bedrooms, market-based rents would generate $26,856,000 per year. Taking into consideration that most Presidio units are multiple-bedroom apartments, duplexes, and houses, a conservative, market-based estimated average rent for a typical unit of $3,000 per month would generate annual revenue to the Trust of $40,284,000. (Estimated housing renovation costs of $70,000 per unit (p.12-13) could easily be recaptured from the rental income stream in the first few years). 55-8

When consideration is given to the combined income from non-residential leasing and residential leasing, it appears that the Presidio Trust could achieve financial self-sufficiency by 2013 without development at the Letterman Complex.

Square Footage Ceiling at Letterman Complex

Planning guidelines for new construction typically include underground development as well as above-ground development when calculating the square footage of any project.

The proposed new underground construction of a parking garage at the Letterman site would be 589,000 sq. ft. The above-ground development would be 900,000 sq. ft. Added together, the resulting square footage exceeds limits imposed by the GMPA for the Letterman site. 55-9

* Please explain why underground development square footage should not be included in the calculation of total square footage of the project.

Sanitary Sewage

The City of San Francisco is under no obligation to accept sanitary sewage from the Presidio after the present contract expires in 2004. According to SFPUC General Manager Anson Moran, there is no MOU of any kind between the City and the Presidio for acceptance of Presidio sanitary sewage into the City's system beyond that date. At the present time, the Presidio Trust is unable to provide on-site storage and treatment of its own waste before discharge into the Bay or Ocean. 55-10

* Please identify any contract or MOU, written or implied, between the City and the Presidio Trust whereby the City agrees to accept Presidio sewage into the City's system on a long-term basis.

* Please present alternatives for sanitary sewage treatment and disposal if the City cannot accept Presidio sewage after 2004. 55-11

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Under the existing sanitary sewer system at the Letterman Complex, all sewage from Letterman discharges into the City's system at the Lombard Gate and is treated at the City's Southeast Water Pollution Control Plant (SEWPCP).(DSEIS p.A-6) Maximum outflows into the City's system are estimated at 78,000 gallons per day (or 28,470,000 gallons per year). (p.A-6) 55-12

* Please identify how this will be metered and whether 78,000 gpd is an absolute maximum to which the Presidio Trust commits.

The DSEIS states: "Maximum outflow resulting from the Alternatives (78,000 gpd) would not burden the City & County of San Francisco wastewater treatment facilities because the City has the capacity to readily handle the estimated sewage discharge." (DSEIS p.viii) Again, by reference to the GMPA FEIS p. 170, the statement is made that "analysis determined that no additional burden on the City system would be expected because it has the capacity to readily handle the estimated sewage discharge.." (DSEIS p.A-6).

* These are naked assertions without supporting documentation other than a "personal communication" with a CCSF PUC employee. Please provide documentation which supports your conclusion of "no burden" to the City, in light of the following facts:

All Letterman sewage is treated at the SEWPCP. This plant does NOT have additional capacity in wet weather. Feces and other raw sewage regularly backflow from storm drains in wet weather, flooding the streets of the Bayview District. According to testimony before the Health, Family & Environment Committee of the SF Board of Supervisors on 5/14/98, PUC General Manager Moran stated: "There is in the Southeast part of town flooding which takes place regularly in heavy storm periods." At the same hearing, Supervisors Bierman, Katz, Ammiano and Brown stated: "This is unacceptable." The SEWPCP already treats 80% of all sewage generated in the City of San Francisco. 55-13

Since the writing of the 1994 GMPA FEIS, huge new developments on the Eastern side of San Francisco have been planned and are coming on-line, producing further stress on the capacity of the SEWPCP to treat the City's sewage.

According to further testimony of PUC General Manager Moran before the Public Utilities & Deregulation Committee of the SF Board of Supervisors 7/20/99: "There are failures in our sewer system (at SEWPCP) due to structural inadequacies and hydraulic inadequacies," and the estimated cost to remedy these inadequacies is $190.0 million.

According to the GMPA FEIS p.170, estimated sewage from the Presidio as a whole which is to be discharged into the City's system is 392,000 gallons per day (or 143,080,000 gallons per year).

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Questions:

* How much of the 143,080,000 gpy will go to the SEWPCP? Will any of it go to Oceanside? At the present time, is there a connection for Presidio sewage to be transported to Oceanside? 55-13

* Is the estimate of 143,080,000 gpy an absolute maximum to which the Presidio Trust commits? 55-14

* Under NEPA, the Trust must consider all reasonable alternatives to a proposed course of action. Since the City's sewer system at SEWPCP is at present already over-burdened in wet weather, please discuss the alternative of Presidio on-site storage of sewage in wet weather before discharge into the City's system. Will the Trust build on-site storage capability? 55-15

* Since the large amount of new development coming on-line in the Eastern sections of San Francisco will further burden the SEWPCP, and sewage from the Presidio/Letterman will take up capacity in the City's system, please discuss the alternative of the Presidio Trust building and operating its own on-site sewage treatment plant to accommodate its own development. 55-16

* Ongoing disposal of sanitary sewage into the City's system will contribute to a cumulative reduction in municipal sewage treatment capacity. The issue of Presidio sanitary sewage discharging into the City's system requires additional analysis. 55-17

Solid Waste

* Has the Presidio Trust obtained approval from the California Integrated Waste Management Board to send Letterman solid waste from demolition/construction activities (estimated at 80,000 tons) to either of the three cited disposal sites: Redwood, Altamont, or Zanker Road? (MP 131) 55-18

* Is there any agreement between the Presidio Trust and any landfill operator to accept Letterman demolition/construction debris? 55-19

* According to the SF Department of the Environment, the Altamont Landfill, which the City uses, will be at capacity in less than 7 years. The CCSF at the present time has no identified alternative for its own future solid waste needs when Altamont is full. If disposal of debris from Letterman goes to Altamont, it will adversely impact the solid waste disposal capacity of the CCSF. Disposal at any other site will adversely impact regional capacity. 55-20

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* Please discuss the alternative of the Presidio Trust disposing of its own demolition/construction debris at one of the 17 existing landfill sites on the Presidio. This action would relieve the burden on the landfill sites available to the City. 55-20

* California AB 939 requires all jurisdictions to direct 50% of their total waste stream from landfills by 2000. Is the Trust meeting this mandate? 55-21

Water Supply

The DSEIS states: "Lobos Creek will be unable to meet the Presidio demand of 1.69 million gallons per day (616,850,000 gallons per year) under high use assumptions." (p.54)
"The Presidio Trust is in the process of planning for contingency and emergency access to additional sources of water as well as implementing domestic and irrigation water conservation measures to reduce the overall consumption of water at the Presidio to fit within available supply." (p.54) 55-22

* Please clarify what is meant by "contingency" access and what is meant by "emergency" access. What defines an emergency? Would expectation of contingencies or emergencies dictate the limitation of the amount of future development at the Presidio?

* Please specify the "additional sources of water." 55-23

* Mitigation Measure WS-2 states: "Reduce water demand from Lobos Creek by securing an alternate water supply source, such as the anticipated use of reclaimed water from the City of San Francisco water system for Presidio irrigation purposes." (p.36)

There is no possibility for the foreseeable future of the Trust obtaining reclaimed water from the City, since no such capability exists on the part of the City to provide reclaimed water to anyone. Such capability is dependent on the construction of hundreds of millions of dollars of City infrastructure and increased bonded indebtedness. This is highly unlikely to occur. 55-24

* Therefore, please identify the "alternate water supply source" if City reclaimed water is unavailable to the Presidio.

* Please clarify whether the Presidio Trust will ask the City for Hetch Hetchy water. If so, in what amounts? 55-25

Because of past drought experience and because of recent increased planned development and expected increased water demand within San Francisco, the PUC has recently given its General Manager authority to impose mandatory water conservation measures on San Franciscans. 55-26

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* IF Hetch Hetchy water, in any amount, is supplied to the Presidio, this would reduce the supply available to San Franciscans. Please discuss what would be the impacts to the citizens of San Francisco to reduce their own available water supply in order to provide water to the Presidio to accommodate federal park development. 55-26

* Any request by the Presidio Trust for Hetch Hetchy water, whether emergency or non-emergency, would have an adverse impact on the other users of Hetch Hetchy water since it would decrease available supply. The CCSF is under no obligation to provide water to the Presidio. If the City cannot make Hetch Hetchy water available to the Presidio, what will be the impacts on development plans for the Letterman site? For the Presidio in its entirety? 55-27

* Can the Presidio Trust provide for all its water needs which are necessary to accommodate Letterman and Presidio development without access to Hetch Hetchy water? 55-28

* The Presidio Trust has the alternative of satisfying all its own water needs from its own resources (Lobos Creek), so as not to make any demands on the City's supply, by either limiting Presidio development to fit within available water supply from Lobos Creek, or identifying a source of supply other than Hetch Hetchy. Please discuss the alternative of limiting Letterman/Presidio development in order to fit the amount of development to available Lobos Creek supply. 55-29

* Please discuss the alternative of the Trust building its own desalination plant to develop additional water supply. 55-30

* Please discuss the alternative of the Trust building its own reclaimed water plant to supply its own irrigation needs. 55-31

* If LAMC and LAIR were mothballed and eventually demolished, 32,485,000 gallons of water per year (89,000 gpd) (DSEIS p.54) would be available for use elsewhere on the Presidio. Please discuss this alternative in the context of available supply from Lobos Creek. 55-32

<u>Transportation</u>

* The Alternative 5 Lucas Digital Arts proposal includes new construction of a 1500 car underground parking garage. Please clarify how the addition of a 1500 car parking garage is consistent with stated GMPA goals of reducing and limiting vehicular access to the Presidio. 55-33

* Please discuss the alternative of NO garage at the Letterman site. 55-34

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* Please discuss the alternative of mandating that Letterman tenant employees take public transit or vanpool to work, leaving their private vehicles at home and relieving the need to provide parking at the Letterman site. 55-35

* The proposed entrance/exit of the garage is to be from Gorgas Avenue and Doyle Drive. Doyle Drive is federal highway 101, the principal access to the Golden Gate Bridge, and a key component of the regional transportation system. The siting of the garage as proposed will adversely impact the flow of traffic on Doyle Drive. 55-36

Please discuss the alternative of siting the garage entrance/exit elsewhere on the Letterman site, for example, from the West, so that access and egress would be from internal Presidio streets such as O'Reilly or Letterman Drive, which would help alleviate anticipated congestion on Highway 101.

* Please clarify how using Gorgas as the main vehicular entrance to the Letterman site is consistent with GMPA goals of Gorgas as a pedestrian street. 55-37

* Please clarify how tour and shuttle buses would access the Letterman site and where they would park. 55-38

* A new intersection adjacent to Bldg. 1160, where none now exists, is proposed. Also proposed is a new, reconfigured intersection at Gorgas/Lyon/Richardson/Doyle. Both intersections would provide left turns for westbound Doyle traffic into the Letterman site, and would also make provision for left turns from the Letterman site onto Doyle. The resultant significant increase in red light time stopping Doyle traffic will impede traffic flow on this federal highway. 55-39

* Please identify alternatives to these two new intersections.
* Please discuss the off-site impacts of these new intersections on the traffic patterns on neighboring residential streets of the Marina District, particularly Marina Blvd. 55-40

* The 1993 Doyle Drive Task Force Report, whose recommendations were adopted by the SF Board of Supervisors, identifies Gorgas Avenue as the preferred alignment for the soon-to-be rebuilt Doyle Drive. If the main vehicular access to the Letterman site is changed from the present access through the Lombard Gate to Gorgas Avenue, this might preempt the use of Gorgas for the rebuilt Doyle Drive alignment. 55-41

Under NEPA, the agency preparing an EIS must discuss "possible conflicts between the proposed action and ... local... land use plans [and] policies..." (40CFR§1502.16(c).) "To better integrate environmental impact statements into...local planning processes"

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an EIS must discuss "any inconsistencies of a proposed action" with local plans, whether or not those plans are federally sanctioned. (40CFR§1506.2(d).) Where an inconsistency exists, the EIS is to "describe the extent to which the agency would reconcile its proposed action with the plan..." (Id). 55-41

* How will the Presidio Trust reconcile its proposal to use Gorgas Avenue as the main vehicular entrance to the proposed 1500 car garage with the City's desire to use Gorgas Avenue for the realignment of Doyle Drive?

* The DSEIS p. 33 states: "A Transportation Demand Management program would be put in place to minimize traffic impacts.." What are the numerical standards that define "minimize"? What does "minimize" signify in terms of present-day traffic volumes? 55-42

* The City of San Francisco has no agreement with the Presidio Trust regarding the proposal for intersection changes and new signalization at Gorgas/Lyon/Richardson/Doyle Drive. Please identify a source of funding for the proposed changes. Please identify alternatives to the proposed changes to this intersection. 55-43

* Is there any agreement between the Presidio Trust and Caltrans for the Trust's proposed new intersection behind the Palace of Fine Arts on Doyle Drive adjacent to Bldg. 1160? 55-44

* Please identify a source of funding for this proposed new intersection. 55-45

* Please identify alternatives to this proposed intersection. 55-46

* The Lombard Street Gate is presently the primary vehicular entrance to the Presidio from the East and to the Letterman site; Gorgas Avenue is a secondary entrance. Alternatives 2-5 would reverse this traffic pattern, making Gorgas the primary vehicular entrance. Please discuss on-site and off-site impacts of this reversal on the traffic patterns of Highway 101 and on the traffic circulation patterns of the Marina District. 55-47

* Please reconcile DSEIS Table 4 p. 66 with "Presidio Transportation Planning & Analysis Technical Report" (A Supplement to the GMPA) p111-24 Table III-2 LOS for Doyle/Marina/Lyon = "F". 55-48

Thank you for the opportunity to comment on the Letterman DSEIS.

Joan Girardot

Joan Girardot
President - CSFN

Responses to Comments in Letter 55

55-1

Thank you for your letter. This inconsistency is addressed in Section 4.5.1.2 of the final EIS. Also, please refer to master response 2A with regard to conformity with the GMPA and to Sections 1.1 and 1.2 of the Final EIS.

55-2

Please see master responses 2A, 2B, and 4A.

55-3

Please refer to the response to comment 44-45 and master responses 4B and 16.

55-4

Please refer to master response 17.

55-5

For response to the comment concerning the financial effects of the project on the Presidio, please refer to master response 10A and Section 1.2 of the Final EIS. In addition, the Trust Act in Section 104(o) specifies that if the Trust fails to become financially self-sufficient by 2013, the property under its jurisdiction will be transferred to the General Services Administration to be disposed of in accordance with the procedures outlined in the Defense Authorization Act of 1990 (104 Stat. 1890), and transferred lands will be deleted from the boundary of the Golden Gate National Recreation Area. In the event of such transfer, the terms and conditions of all agreements and loans regarding such lands and facilities entered into by the Trust will be binding on any successor in interest. Pursuant to this provision, the preferred alternative and other leased properties would remain in the uses specified in lease agreements. Please refer to the Financial Management Program in Appendix E of the Final EIS and to master responses 10A and 10B.

55-6 AND 55-7

Please refer to the Financial Management Program in Appendix E of the Final EIS, and the master responses 10A and 10B. See also Sections 1.1 and 1.2 of the Final EIS.

55-8

The Financial Management Program in Appendix E of the Final EIS projects fiscal year 2013 housing revenues of $20.6 million, in 1998 dollars, *net of operating expenses*. The commentor's approximation of Presidio housing revenues does not net out operating expenses, currently estimated at 27 percent. Nor does the approximation reflect the cost of Trust programs to discount the cost of housing for Presidio-based households with annual household gross incomes of less than $45,000. Please refer to the Financial Management Program in Appendix E of the Final EIS, and master response 10A.

55-9

Please see master response 11.

55-10 AND 55-11

The commentor is correct. There is no such contract or MOU. Please refer to master response 14.

55-12

The 78,000 gpd is a reasonable "worst-case" estimate based on the best information available to date (the preferred alternative would discharge substantially less: 51,000 gpd). The Presidio Trust is committed to establishing a reclaimed water system to reduce cumulative impacts on the city's sanitary sewer system, including the project's contribution to cumulative impacts. Please refer to master response 14.

55-13

First Asterisk – This conclusion was supported by the City and County of San Francisco (CCSF) and was previously discussed in the GMPA EIS from which this EIS tiers. Please refer to master response 14.

Second Asterisk – Currently, the Presidio discharges sewage into the CCSF's Southeast Water Pollution Control Plant (SEWPCP) and Oceanside treatment plants. Its current flow into the SEWPCP system is approximately 280,000 gpd. Its current flow into the Oceanside system is approximately 85,000 gpd.

55-14

The Presidio Trust is committed to addressing waste management in an environmentally responsible manner as contemplated in the general objectives of the GMPA. The reclaimed water system referred to in master response 14 is an example of this commitment, which would reduce the amount of sewage discharged to the SEWPCP by a minimum of 200,000 gpd.

55-15 AND 55-16

Please refer to master response 14.

55-17

Please refer to Section G.2, Wastewater Treatment and Disposal in Appendix A of the Final EIS for the requested additional analysis and to master response 14.

55-18

The California Integrated Waste Management Board (CIWMB) is responsible for certifying local enforcement agency programs; reviewing permitting and closure/postclosure documents; providing inspection and oversight of local programs to ensure that state programs are effectively implemented; enforcing state standards and permit conditions in addition to or in lieu of a local enforcement agency; and administering a remediation program for orphaned, illegal, and abandoned sites. A copy of the EIS was provided to the CIWMB through the California Environmental Protection Agency for their review to ensure that impacts on solid waste facilities were adequately addressed. No further CIWMB action on the Letterman project is required.

55-19

No such agreement has been made nor would it be possible or desirable this early in the development stage of the project. However, as discussed in the Draft EIS, all landfill operators interviewed by the Presidio Trust expressed interest and had sufficient capacity to accept the debris.

55-20

The Presidio Trust agrees with the conclusion reached by the commentor. The cumulative impacts on the regional solid waste capacity are discussed in Sections 4.1.11.1 through 4.6.11.1 of the Final EIS. There are no landfill sites on the Presidio that have not been identified for cleanup.

55-21

No, because Presidio Trust waste diversion programs, including waste reduction, reuse, recycling, and composting, are still in the infancy stages. However, the Presidio Trust is committed to meeting the goal of California AB 939 for the Letterman project (see mitigation measure SW-1, *Waste Reduction Goals*).

55-22

A significant water shortage on the Presidio would constitute a contingency or emergency (i.e., should there be a significant shortfall between available water and water demand). As shown in Table 12, Water System Demand and discussed in Section 4.5.3 of the Final EIS, this shortfall would peak at about 286,000 gpd in June in typical and drier years. In the unlikely event that the Presidio Trust were unable to implement those supply- and demand-side solutions identified in mitigation measure WS-2, *Water Supply- and Demand-Side Solutions to Reduce Cumulative Effects*, to mitigate potential shortfalls, it would consider limiting future development. Refer to master response 13.

55-23

The primary additional source of water would be reclaimed water from the Presidio's proposed water reclamation plant. The availability of this water for irrigation use would free up substantial amounts of Lobos Creek water for potable applications. The text in Section 3.5.2 of the Draft EIS has been revised to reflect this water source. Refer to master response 13.

55-24

The conclusion reached by the commentor is also supported by the city (see comment 36-3). Therefore, the mitigation measure now refers to the availability of Presidio reclaimed or purchased water as alternative water supply sources to CCSF reclaimed water.

55-25 AND 55-26

The city has asserted that it is not obligated to supply water to the Presidio (see comment 36-2). As stated in mitigation measure WS-2, the Presidio Trust is in the process of implementing an array of supply- and demand-side solutions to mitigate potential shortfalls resulting from Lobos Creek protection. To protect the unique Lobos Creek habitat and water supply resource, the solutions listed in the mitigation measure and others would be explored, adopted, and implemented as soon as possible. While the Presidio Trust does not at this time expect to rely on city water to meet the needs of projected Presidio demand in the long term, it cannot dismiss the possibility of entering into negotiation of water purchase and/or resale agreement with the city in the near future. Use of CCSF water may be unnecessary because implementation of the remaining listed measures would result in a water savings that would more than compensate for the Presidio-wide peak shortfall. Refer to master response 13.

55-27

Please refer to the response to comment 23-65. Please note that the city has indicated that its water could be supplied to the Presidio for contingency and emergency purposes, and therefore such a scenario is unlikely.

55-28 AND 55-29

Please refer to the master response 13.

55-30

Implementation of the reclaimed water plant as discussed in mitigation measures WS-2 and WT-1 would make the building of a desalination plant unnecessary. Refer to master responses 13 and 14.

55-31

A water reclamation plant is the key supply-side solution that would be established under mitigation measure WS-2. Refer to master response 13.

55-32

Such an alternative is infeasible for the reasons provided in Section 2.2.3, Remove LAMC and LAIR and Restore to Natural Conditions.

55-33

See master response 20.

55-34

Alternatives 1 and 6 do not have an underground garage, so this option is covered in the Draft EIS. The purpose of the proposed underground garage is to maximize the amount of green space on the 23 acres. Surface parking for the estimated demand of 1,328 spaces in Alternative 1 would require approximately 11 acres, or about half of the site. This alternative would undoubtedly preclude any major open space enhancements on the site.

55-35

While the use of transit and vanpooling through a TDM program (refer to mitigation measure TR-8) would be strongly encouraged, a mandatory program is not practical since some Letterman Complex employees would have difficult access to either transit or vanpools. In addition, it would not be fair to single out Letterman Complex tenants for such restrictions unless all other employees in the park were subject to the same constraints. The EIS preparers are not aware of any facility in the Bay Area where compulsory use of vanpools or transit has been mandated. See master response 19.

55-36

See master response 18.

55-37

The GMPA anticipated that Gorgas Avenue would continue to be an entrance to the Presidio, primarily to service vehicular traffic into the LAMC/LAIR parking area and that the Gorgas Avenue/Lyon Street intersection would be redesigned to remedy safety issues. In addition, the GMPA stated that in the future, "Gorgas Avenue may be closed to private vehicles beyond the Letterman parking access points, to permit safe pedestrian and service access and create a more campus-like environment." Given the revised intersections at Richardson Avenue recommended as mitigations for Alternatives 2 through 5 (see master response 18), the revised parking access points would move approximately 350 feet to the west. However, most of the length of Gorgas Avenue would be unchanged from the GMPA concept. None of the alternatives would close Gorgas Avenue to traffic. The Final EIS analyzes the effects of each of the alternatives on historic streetscapes in Sections 4.1.8 through 4.6.8 (Cultural Resources). This includes analysis of the historic Gorgas Avenue streetscape.

55-38

See the response to comment 32-5 regarding tour bus access. Providing tour bus parking at the Letterman Complex is not expected because it is not a tour bus destination. Shuttle buses would be internal to the Presidio and would not park in the Letterman Complex. Shuttle bus stop locations would be designated as part of the Letterman site planning process.

55-39

Refer to master response 18.

55-40

One alternative to the two new intersections proposed on Richardson Avenue that would provide the same level of accessibility includes a grade-separated structure (i.e. flyover ramps), which essentially allows for the left-turn movements without stopping the opposing flow of traffic. However, these would have significant impact on the immediate environment, especially historic structures in the area. Alternative locations for a new or improved access point are restricted by the historic value of the Presidio wall and the park's gates. In addition, other existing Presidio gates are located in residential neighborhoods which do not have infrastructure to effectively and safely accommodate the amount of traffic that would be generated at the 23-acre site. See master response 18.

55-41

See master response 21.

55-42

Refer to master response 19 for discussion of mode split and Transportation Demand Management. Peak hour traffic volumes forecast for the Presidio gates using the assumed automobile mode shares are given in Table D-8 in Appendix D of the EIS. These show a total p.m. peak-hour traffic entering and exiting all gates to be 7,850 to 8,300 (8,050 for the preferred alternative). This compares to 1998 volumes of approximately 6,000 (NPS 1999f). Thus, there would be approximately a 33 percent increase in traffic over 12 years.

55-43

No funding source is currently identified for this project. Alternatives to the design shown in the EIS would be identified and studied as part of the Caltrans Project Study Report (PSR) process (see master response 18).

55-44

There is currently no agreement with Caltrans on the proposed intersection. Such an agreement would come upon satisfactory resolution of the PSR and permitting process (see master response 18).

55-45

See the response to comment 55-43.

55-46

See the response to comment 55-43.

55-47

The new intersections on Richardson Avenue/Gorgas Avenue proposed as part of Alternatives 2 through 5 (mitigation measure TR-1, *Lyon Street/Richardson Avenue/Gorgas Avenue Intersection Improvements*) would become the primary entrance and exit to the Letterman Complex, while the primary access to the rest of the Presidio from the east would remain at Lombard Street. As such there would not be any reversal of travel patterns in the vicinity of the Presidio. The new intersections would allow traffic generated by new uses at the Letterman Complex to remain on the major arterials such as Richardson Avenue, rather traveling through residential streets to access the Lombard or Marina gates.

55-48

Table III-2 of Presidio Transportation Planning & Analysis Technical Report: A Supplement to the GMPA (NPS 1994b) does not indicate that the intersection of Doyle Drive/Marina Boulevard/Lyon Street operates at LOS F. Rather, the report identifies the intersection of Mason Street/Marina Boulevard/Lyon Street/Doyle Drive as operating at an overall LOS E, and the most congested approach (westbound through movement) operating at LOS F during the p.m. peak hour. All other approaches are indicated to operate at LOS B or A. Part of this intersection is stop-controlled (Mason Street/Marina Boulevard/Lyon Street), while another is signalized (Doyle Drive/Marina Boulevard/Lyon Street). Although it is not clear what methodology was used for the analysis in the GMPA, the intersection is analyzed as a single intersection in this EIS.

Because the methodology for analyzing signalized intersections is distinctly different from the methodology for analyzing unsignalized (stop-controlled) intersections, the EIS analyzes the two parts of the intersection separately. The intersection of Doyle Drive/Lyon Street/Marina Boulevard is signalized and is analyzed with the appropriate procedure for signalized intersections as outlined in the Highway Capacity Manual (Transportation Research Board 1994). The signalized intersection operates at an overall LOS B during the p.m. peak hour. The intersection of Mason Street/Marina Boulevard/Lyon Street is an unsignalized intersection with Lyon Street stopping, and is analyzed accordingly. The most congested approach of this intersection was found to operate at LOS B. Field observations confirmed that the westbound approach (Marina Boulevard) does not currently operate at LOS F.

Letter 56

MICHAEL ALEXANDER
1717 Mason St.
San Francisco CA 94133

Tel: (415) 441-6700
Fax: (415) 346-6607
eMail: MALEX1@aol.com

August 2, 1999

NEPA Compliance Coordinator
Attn.: Letterman Complex
The Presidio Trust
34 Graham St.
P.O. Box 29052
San Francisco CA 94129

Dear Sirs:

These comments on the Letterman Complex Draft Supplemental Environmental Impact Statement are submitted by Michael Alexander and Kent Fickett. Mr. Fickett is a member of the Sierra Club's National Energy Committee, and is past vice president for conservation of the Mt. Diablo Audubon Society.

These comments are limited to sustainability issues involving the Letterman Complex. They are based on the observation that no semi-finalist in the Letterman competition had a lock on good sustainability proposals and concepts. We reviewed all the ideas with the view that the best, from whatever source, should be incorporated into the contract with the developer who actually builds the Letterman Complex. We urge the Presidio Trust ("the Trust") to do so.

In reviewing sustainability in the EIS Alternatives, we had to refer to the concept proposals of the semi-finalists. Since Alternatives 2, 3, 4 and 5 match the concept proposals, these comments will call them by the names of the developers: in turn, Lennar; Walsh-Higgins; Shorenstein; and Lucas (now chosen by the Trust as its Preferred Alternative). 56-1

GOALS. The clearest and most comprehensive goal statements are by Lennar and Shorenstein, with Walsh-Higgins next and Lucas, last. The Trust should incorporate the best of the Lennar and Shorenstein goal statements into its contract. The contract needs to reinforce them, by translating them into specific, positive incentives for performance.

The pattern of building construction is to comply with the spirit of Title 24 at the design and permit stages. However, construction often produces variances with sustainable practices. The Trust will need to allocate adequate resources to monitor compliance with sustainable issues through construction and startup. As you will see, we also recommend a Sustainable Budget Monitoring System, which should be included in the Goals statement.

Letterman EIS Sustainability Comments
August 2, 1999
page 2

SITE PLANNING.

Building orientation. All buildings should have their long facades oriented north/ south, to maximize daylight and solar heating in winter. 56-2

Sun screening. Walsh-Higgins had it right— trees south of buildings should be deciduous, to maximize winter daylight and solar heating. The moderate coastal climate of the Presidio site requires air conditioning on only a few days a year. Energy lost to air conditioning on those days will be far less than solar heat gained, particularly in winter. 56-3

Landscaping. Shorenstein has the best program. The key is maximum use of low-water species of native plants. Lucas's suggestion of adding water-retaining soil amendments is worthy, but its proposal for a large lawn is much less so, and the EIS should compare its impacts to alternative landscapes. Lawns, even non-monoculture, require large amounts of irrigation and significant energy for mowing and other maintenance. If a meadow is chosen as a major landscape feature, hardy native bunch grasses should be considered instead of lawn grasses.

The EIS should investigate the opportunity presented by the pre-twentieth century Letterman landscape. According to the Presidio Draft Vegetation Management Plan, the Letterman Complex north of the present LAIR building was a wetlands. Instead of a lawn, Letterman's new landscape could be a logical extension of the Crissy Field wetlands, connecting as well to the lagoon at the Palace of Fine Arts ("PFA") which is the remnant of the original wetlands. This landscape would provide a spectacular national park entry landscape to people on Richardson Ave., Doyle Drive, and Crissy Field. It should be created as part of the reconstruction of Doyle Drive. 56-4

Should a wetlands extension prove infeasible, the EIS should consider and analyze a retention basin that could hold heavy runoff, then drain it to the PFA lagoon or the Crissy Field wetlands. Every effort should be made to connect these water features. Providing the PFA lagoon, now a freestanding and biologically unhealthy pond, with an inlet and outlet would have significant benefits for the Trust and San Francisco.

We find great merit in the concept and design of the wet/dry waterway which Walsh-Higgins proposed as a feature of its central commons.

Storage. The basement cistern proposed by Lucas and Lennar warrant serious study and analysis, but the water should be used as described above, and not for lowest-priority irrigation. 56-5

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August 2, 1999
page 3

Recycling. Runoff should be collected and processed for wetlands and non-potable uses. Shorenstein's specific suggestions are excellent: silt and oil separators throughout the site, storm drainage designed to work with the future expansion of the Crissy Field wetland and the Tennessee Hollow drainage restoration. 56-6

BUILDING DESIGN.

Passive solar. Along with the usual thermal mass, shading, glazing, insulation and infiltration controls, the design should incorporate reflective passive lighting systems to direct daylight to the shaded sides of buildings. 56-7

Active solar. Lennar has it: photovoltaics on south-facing roofs. The EIS should also consider the benefits of using thin-film photovoltaics on sunny walls. 56-8

Daylighting. Lucas and Lennar offer the most comprehensive ideas. The key is narrow buildings with maximum penetration of filtered daylight. 56-9

Ventilation. Operable windows are a natural for this climate. They need to be backed up by a system that monitors windows that have been left open when air conditioning or heating comes on. Control can be active (auto-close windows), or passive (maintenance people tour the building to close the windows).

Lennar offers the most comprehensive ventilation program. Lennar and Lucas's raised floor plenums are excellent, providing better ventilation and more flexible space use and cable reconfiguration. Proposals to pre-cool the concrete floor slab, and Lennar's use of a concrete rubble thermal mass store under the building are highly commendable, but need careful investigation of results at sites where they have been used before. 56-10

Heating and cooling should be integrated with on-site co-generation units using fuel cells.

Energy. Lucas's use of microturbines for on-site generating capacity should be discouraged in favor of fuel cells. 56-11

Lighting. Walsh-Higgins is correct: low ambient light plus task lighting, with sensors to adjust light levels to available daylight.. We don't know if Lucas's total connected lighting load target of 0.8 watts per square foot is the right number or not, but it is the wrong approach. Instead, 56-12

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August 2, 1999
page 4

design should begin by asking, 'how much workspace can be illuminated with passive daylight? Then add task lighting as needed 56-12

Building Performance Modeling. Lennar's is the best program, though we're unfamiliar with the project being developed by the Center for Built Environment at UC Berkeley. See also the enclosed Sustainable Budget Monitoring System. 56-13

Financial Analysis. Life cycle costing is great, but the Trust must know the assumptions, including how many years. Depletion allowances should be factored in. Mr. Fickett recommends consultation with Resource Economists Dr. Darwin Hall, University of Long Beach, (562) 985-5045; and Dr. Jane Hall, California State University Fullerton, (714) 278-2236. 56-14

LEED building rating. The level to be achieved should be part of the contract. 56-15

Grey water. Opportunity should be maintained for connection to the San Francisco grey water system. 56-16

DECONSTRUCTION. All are good. Shorenstein is most comprehensive. 56-17

CONSTRUCTION MANAGEMENT. All provide the right buzzwords, but compliance monitoring is crucial 56-18

.

MATERIALS SPECIFICATION AND PROCUREMENT. The best statements are by Lennar and Shorenstein. Lucas is disappointingly vague. Shorenstein proposes a minimum of 20-25% fly ash content for concrete. Fly ash is a by-product of burning coal. If its use just reduces a store of waste, it is beneficial. If instead or in addition it builds a market for increased use of coal, it is not beneficial. 56-19

BUILDING / ASSET MANAGEMENT AND OPERATIONS.

Landscape maintenance. Design is key to minimizing maintenance costs and use of pesticides, herbicides and fertilizers. The "Golf and the Environment" standards and practices which have been adopted by the Arnold Palmer Co. at the Presidio Golf Course may prove to be good guides. 56-20

Alternative Transportation. All provide large parking lots, even if underground. The Trust's 56-21

Letterman EIS Sustainability Comments
August 2, 1999
page 5

contract should include standards for ride share, car pools, van pools and taxi programs. On-site photovoltaics can provide fuel for electric cars. Shorenstein's bicycle program is the most complete and commendable, as is the rest of its alternative transportation program. 56-21

The Trust should contract with Golden Gate Transit to have empty buses traveling in the non-rush direction during peak hours instead carry passengers between downtown transit nodes and the Presidio. These empty buses already travel on Doyle Drive, right through the Presidio. They are a valuable resource being wasted. They are a far better choice than asking Muni to duplicate Golden Gate's service by increasing the frequency of parallel express routes. Muni's scarce resources should be used elsewhere where demand is high. On the other hand, Muni's local routes need to provide better Presidio service. 56-22

DEMONSTRATION TECHNOLOGY. Shorenstein's use of the Environmental Operations Manager as a consultant for selection of office equipment, transportation options, etc. is excellent and should be part of the Trust's contract. Walsh-Higgins's study of use of fuel cells and photovoltaics are part of recommendations above. 56-23

EDUCATION. Lennar and Shorenstein's proposals should be in the Trust's contract.

In addition, the developer should implement a program to educate construction workers on the sustainable building habits and construction practices they are employing at Letterman, transferring those skills to future jobs. Along with incentives for timely performance, there should be bonuses and penalties (liquidated damages) explicit in the contract, so that the contractor monitors subcontractors. Time bonuses should not come at the expense of slipshod environmental practices. 56-24

Included in these comments is the outline for a Sustainable Budget Monitoring System which will help keep the Letterman Complex sustainable through its lifetime. 56-25

Thank you for the opportunity to comment on the Letterman Complex Draft Supplementary EIS. We hope these comments prove useful to the Trust and that their provisions become part of the EIS and of the awarded contract.

Yours sincerely,

Michael Alexander

Kent Fickett

Responses to Comments in Letter 56

56-1

Thank you for your proposal for a Sustainable Budget Monitoring System (due to its length, the commentor's proposal has not been included in this document, it is available for review at the Presidio Trust library). The proposal provides implementation steps to fulfill the goal of environmental sustainability for the project (as discussed in Section 1.3.9, Environmental Sustainability) and would be considered as planning proceeds. Please refer to letter 35 prepared by the sustainability and green building services consultant with the development team for the Digital Arts Center. In the letter, the commentor addresses techniques that would be employed to meet the Presidio Trust's sustainability goals. Should the preferred alternative be selected, the Presidio Trust would work with the consultant during planning, design, and construction of the project to ensure that these and other practices are incorporated into the final product to ensure it is a model of sustainable development. It should be noted that using the U.S. Green Building Council's LEED rating, the proposed design would achieve a Gold rating (meaning that the project would be one of the highest performance green buildings in the country).

56-2

While the longest building façades for Alternative 5 are east- and west-facing, these spans are predominantly circulation spaces. The primary occupied spaces are on north and south façades in thin-profile, daylit buildings. With approximately 900,000 square feet, this would be a "load-dominated" structure, so cooling would be a year-round concern and solar heating would be less desirable than in smaller "skin-dominated" structures.

56-3

With a "load-dominated" structure, the design for Alternative 5 would attempt to maximize daylighting while moderating thermal gain. Air conditioning uses electricity, the most economically and environmentally costly form of energy, so the use of operable windows, displacement ventilation and natural cooling to respond to the very favorable climatic conditions would aid to reduce electrical usage.

56-4 AND 56-5

The lawn would serve as a public gathering and event space for activities that would have higher traffic patterns than native bunch grass can sustain. Mixed species turf with the soil amendments, cistern/water feature rainwater capture system, and demand management watering would significantly improve the water budget profile. Research indicates that the shoreline of the pre-Panama Pacific International Exposition wetland appears to have been somewhere at the base of the 23-acre site on or below Gorgas Avenue. Alternative 5's proposed water feature would reintroduce surface water to the site. Restoration of a full wetland system, while an intriguing idea, would require the removal of buildings and streets that is beyond the scope of the project or the site boundaries. These design details would be further studied in the design review process for consistency with the Planning and Design Guidelines.

56-6

Comment noted. Any storm-water runoff that would not be captured and used onsite would drain into the restored Crissy Field wetlands. The discharged water would comply with applicable water quality standards.

56-7

Alternative 5's building design entails extensive consideration of thermal mass, shading glazings, insulation, and infiltration. Given the courtyard configuration, light shelves and similar light bouncing designs would be used to maximize daylighting performance. Vertical reflective systems would create glare problems in this context.

56-8

Integrating photovoltaics into roofs would be investigated in the design process. Thin-film panels on walls may not be compatible with the historic character of the complex.

56-9

The EIS preparers agree because lighting would be one of the project's biggest energy loads.

56-10

Operable windows are essential, and with a displacement ventilation design, do not create the pressure balancing problems usually associated with conventional diffusion ventilation. Energy management strategies for the DAC would respond to window operability.

Onsite co-generation may be explored as a separate Presidio Trust project subject to additional planning and environmental analysis.

56-11

A number of distributed generation options (photovoltaics, fuel cells, micro-turbines and others) would be studied during the design development process to determine possible load matches and waste heat capture applications for the preferred alternative.

56-12

Alternative 5's design is based on a daylight structure and a responsive task/ambient lighting strategy. Experience with these systems has shown that the design would likely have a total connected lighting load of 0.8 watts per square foot, and an operating (or "as used") load around 0.4 watts per square foot.

56-13

Modeling and full commissioning are essential to optimize building performance and would be a crucial part of the project's design/construction/operation process. See also the response to comment 56-1.

56-14 AND 56-15

Comments noted.

56-16

Please refer to master response 13.

56-17 AND 56-18

Comments noted. The Presidio Trust agrees with the commentor that a monitoring program is important.

56-19

The design of the project is still in a conceptual stage, so it would be inappropriate to attempt to list significant materials specifications at this time. As the design for Alternative 5 develops, there would be consideration of sourcing, embodiment, indoor environmental quality, durability, and other issues related to building material choices, consistent with the Planning and Design Guidelines.

56-20

Comment noted.

56-21

Comment noted. The TDM plan worked out by the Trust and the selected development team would include standards of service. Electric vehicle charging stations would be in the Letterman Complex as well as other areas of the park. See master response 19.

56-22

See the response to comment 46-5.

56-23

Comment noted.

56-24

Contractor education is crucial, and along with performance programs, such measures are essential to achieving high-quality buildings.

56-25

Please refer to the response to comment 56-1.

Letter 57

-----Original Message-----
From: Unistars@aol.com [mailto:Unistars@aol.com]
Sent: Tuesday, August 03, 1999 1:40 AM
To: presidio@presidiotrust.gov
Subject: From Star Alliance: Letterman Public Comment + Web Site feedback

Greetings of peace.

First of all here is some feedback about the web site: It is very attractive overall, and excellent to have a web site map (First one I've seen). However, I could not readily find what I needed in a hurry: the Letterman Environmental Impact Report. I scanned the main menus twice and went to "Environmental" but found only the general ideals. Is it under "News?" Why not have a main menu heading for EIR's since they are such a major feature for public review and comment? Sorry, I must now cut to the chase and dash this off. 57-1

Representing Star Alliance — the Universal Star Alliance Foundation (world peace group) — we would like to make several key points re the Letterman choice:

* Despite being very impressed with the Interland et al proposal as well, we are cautiously delighted with the Trust's choice for the Lucas Digital Arts Center. Delighted in that it holds the potential for such powerful support to non-profit organizations attempting to better the world through modern media. Cautious in wondering whether that potential will be fully and fairly realized.
Also, while acknowledging the genius and value of the "Force" themes, etc., we would be more than a bit concerned about the ongoing "wars" theme emphasis of many of the Lucas productions; hoping they will transition to more subtle and peaceful themes as time goes on, perhaps popularizing the idea of a successful "universal war on war" campaign. 57-2

* We would emphasize the responsibility involved to give back to the public from a business allowed to locate at such a fabulous piece of public real estate — to give back in ways that improve the daily quality of life for people everywhere.

* We were delighted to note the key line in the most recent "Star Wars" episode, where young Luke Skywalker propounds: "The main trouble with this universe is that people don't help each other enough!" Here here.

* May we strongly affirm (or suggest) that the Digital Arts Center be encouraged (and in fair and effective ways required) to assist many non-profit organizations, ideally small ones as well as large established operations, in realizing their important goals. One way would be to assist in further conceptualizing, planning and executing the comprehensive Star Alliance vision of a universal Citizens' Cooperation and Media Network. As we see it, this would tend automatically to be inclusive and encouraging of widespread opportunities for public training and positive, creative expression. 57-2

Gratefully yours for all of our "Highest Common Ideals,"

Peter B. DuMont
Director, Star Alliance
unistars@aol.com
Tel: 510-540-8887
(P.S.: Our beginning web site may be found at www.staralliance.net.)

Responses to Comments in Letter 57

57-1

The Presidio Trust provided the Draft EIS the highest visibility possible on its web site by placing directions to the document on the Presidio Trust's home page "banner" which stated "to view the Letterman Draft Supplemental Environmental Impact Statement, click on Library, then Postings."

57-2

The organization's support of the Letterman Digital Center is noted for the record. Thank you for your correspondence.

Letter 58

FEHR & PEERS ASSOCIATES, INC.
Transportation Consultants

3685 Mt. Diablo Blvd., Suite 301
Lafayette, CA 94549-3763

925 284-3200 • Fax 925 284-2691
fehrandpeers.com

PRESIDIO TRUST REC'D

July 30, 1999

NEPA Compliance Coordinator – Attn: Letterman Complex
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, California 94129-0052
FAX: 415/561-5315

Subject: ***Presidio Letterman Complex***
Draft Environmental Impact Statement, April 1999

Dear NEPA Compliance Coordinator:

For the record, we wish to note the following text corrections in the EIS:

Section 4.5.7.1 (EIS, page 164) states "*...Gorgas Avenue Gate traffic would increase 470 vehicles during the PM peak hour, with project-generated traffic comprising 84 percent of the growth.*"

According to Table D-7 (EIS Appendix D page D-7) the Alternative #5 project would generate 260 vehicle trips at the Gorgas Avenue Gate during the PM peak hour. This level of traffic represents 55 percent of 470 vehicles not the 84 percent indicated in the EIS. 58-1

Section 4.5.7.3 (EIS, page 165) states "*. . . The parking demand of 1,260 spaces would primarily consist of long-term employee parking (1,080 parking spaces) and some short-term visitor spaces (180 parking spaces). The parking demand of 1,260 spaces would be substantially less than the proposed supply of 1,530 spaces, resulting in a surplus of 270 spaces.*"

Parking calculation worksheets in Appendix B of the Wilbur-Smith Traffic Study indicate the basis for Alternative #5 long-term parking demand as 769,000 square feet. Vehicle trip generation worksheets in the same appendix indicate that vehicle trip generation was based on 900,000 square feet. Using 900,000 square feet, as the basis for determining long-term employee parking would result in the need for 1,260 long-term employee parking spaces, not the 1,080 indicated in the EIS. Furthermore, the EIS does not take into account additional 58-2

FEHR & PEERS ASSOCIATES, INC.
Transportation Consultants

NEPA Compliance Coordinator – Presidio Trust
July 30, 1999
Page 2 of 2

spaces beyond parking demand to account for parking circulation. Typically, 5 to 10 percent more spaces than projected demand are provided at employment centers so that drivers can find an available parking space without re-circulating through the parking area numerous times searching for an available space.

Combining the parking numbers using 900,000 square feet results in 1,440 spaces (1,260 long-term spaces, 180 short-term visitor spaces). Applying a 5 percent circulation factor brings the total needed supply up to 1,510 parking spaces. 58-2

Text Corrections (Traffic Study)

a. Traffic Study (Table 1.5) the subtotal for on-street parking should be 66 percent not 22 percent. 58-3

b. Traffic Study (Page 2-6) the first paragraph states that Alternative 5 would generate about 1,150 more vehicle trips than Alternative 1. Actually, Alternative 5 generates 506 fewer daily vehicle trips than Alternative 1. Alternatively, the authors may be referring to Alternative 4, which generates significantly more vehicle trips than Alternative 1. 58-4

c. Traffic Study (Page 3-33) the 82X-Levi Plaza Express line serves commute connections to BART, AC Transit, Ferry, and Caltrain. 58-5

We hope this information proves useful in your evaluation of the Letterman Digital Center proposal. If you have any questions or comments, please call me at (925) 284-3200.

Sincerely,

FEHR & PEERS ASSOCIATES, INC.

Robert E. Rees, P.E.
Senior Associate

4A:991-1324

Responses to Comments in Letter 58

58-1

In response to the comment, the error has been corrected, and the second paragraph of Section 4.5.7.1 has been revised to reflect the changed text.

58-2

In response to the comment, the parking demand for Alternative 5 has been revised to ensure uniformity of analysis across all alternatives. The Trust recalculated parking demand using 900,000 square feet, as was done for the other alternatives, as the basis for determining long-term parking demand. The recalculation resulted in total parking demand for Alternative 5 of 1,440 spaces. For further discussion, please refer to master response 20.

58-3

In response to the comment, the table in the background traffic study has been corrected.

58-4

The text on page 2-6 of the background traffic study has been corrected in response to the comment.

58-5

In response to the comment, the text in the background traffic study has been revised to indicated that the 82X-Levi Plaza Express MUNI line would serve commute connections to the Ferry Terminal.

Letter 59

the
SAN FRANCISCO
PARTNERSHIP

Growing Business and Jobs

PRESIDIO TRUST REC'D

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The Shorenstein Company

Gordon R. Smith
Pacific Gas and Electric Company

Karen Wegmann
Wells Fargo Bank

August 2, 1999

Mr. John Pelka
NEPA Coordinator
Presidio Trust
Attn: Letterman Complex
P.O. Box 29052
San Francisco, CA 94129-0052

Dear Mr. Pelka:

Lucasfilm Ltd.'s Letterman Digital Center will provide a tremendous boost to San Francisco's economy and jobs base, as well as to the community. I believe it will greatly enhance and fulfill the objectives of the Presidio Trust's General Master Plan.

First, Lucasfilm's digital innovations will spur the development of other digital media companies in San Francisco, while also providing business to new media companies already clustered here in such fields as online and pc-based education, entertainment, video, post-production and others. The Presidio will be able to attract such companies to other sites, if it wishes.

Second, digital media jobs are jobs of the future – and, with specific training, can employ thousands of unemployed or underemployed San Franciscans at rates of pay much higher than other industries pay at the entry level. This is of great benefit to the community. San Francisco had an industrial-based economy that is disappearing; new and digital media companies, growing at a rate of more than 50 percent per year, are quickly shifting our economy into being technology-based. The Letterman Digital Center will ensure that these jobs are maintained in San Francisco and that San Francisco offers thousands of well-paying jobs for all skill levels. 59-1

Lucasfilm's Letterman Digital Center will provide prestige to the Presidio with a "clean" industry that's global and future-oriented. San Francisco will be fortunate to have the Center as a magnet to attract new jobs.

Sincerely,

Mara Brazer
President

303 Sacramento Street, 2nd Floor San Francisco, CA 94111
phone (415) 364-1799 fax (415) 982-6733 email info@sfp.org web http://www.sfp.org

Response to Comment in Letter 59

59-1

Thank you for your letter. The organization's support of the Letterman Digital Center is noted for the record.

Letter 60

FRIEDMAN FLEISCHER & LOWE LLC

One Maritime Plaza, 10th Floor
San Francisco, California 94111
Telephone: (415) 445-9850
Facsimile: (415) 445-9851

PRESIDIO TRUST REC'D

July 30, 1999

NEPA Coordinator
Attn: Letterman Complex
Presidio Trust
34 Graham Street
P. O. Box 29052
San Francisco, CA 94129-0052

The Letterman Digital Center will help the Presidio Trust meet the objective of financial sufficiency and will attract organizations that have uses similar to the Letterman Digital Center such as community service, the arts, education and innovation that will achieve the objective of the General Management Plan.

As an investment banker, I have a great deal of experience watching and assisting the growth and development of industries throughout the world.

Today, long-term planners, scholars and entrepreneurs, among others, are closely examining the potential of the digital revolution. Most agree that the digital revolution will have an impact on our world surpassing that of the industrial revolution. It already is propelling the most rapid development of new products and ideas in the history of the world. The digital revolution requires "centers of excellence" like the one being proposed at the Presidio. 60-1

History has taught us that an organization with the critical mass of connected, educated, leading-edge thinkers and doers gathered to build the breakthrough technologies and applications for the digital revolution will attract other similar organizations. The Letterman Digital Center will enhance the opportunities for the Trust to rent to profit and non-profit organizations that want to be part of the digital revolution.

The Letterman Digital Center will not only help the Presidio meet the objectives of General Management Plan through the activities at its facility. The Letterman Digital Center will also attract other organizations that will contribute to reaching these goals.

Sincerely,

Tully Friedman

Response to Comment in Letter 60

60-1

Thank you for your letter. The organization's support of the Letterman Digital Center is noted for the record.

Letter 61

United States Department of the Interior

NATIONAL PARK SERVICE
Presidio of San Francisco
P.O. Box 29022
Building 102, Montgomery Street, Main Post
San Francisco, California 94129

IN REPLY REFER TO:
L76 (GOGA-RMPPC)

The Department of the Interior submitted a letter with identical comments to those contained in this letter submitted by the National Park Service. As the two letters are essentially identical, only one letter is reprinted here. Both letters are available for review at the Presidio Trust

August 12, 1999

Mr. Jim Meadows
Executive Director
The Presidio Trust
34 Graham Street
PO Box 29052
San Francisco CA 94129-0052

Re: National Park Service Comments, Draft Letterman Supplemental Environmental Impact Statement

Dear Mr. Meadows:

The National Park Service (NPS) has completed its review of the Draft Environmental Impact Statement and Planning Guidelines for the Letterman Complex (DEIS). For this proposed project, the NPS has the status of a "cooperating agency," as defined by the National Environmental Policy Act (NEPA) based on NPS knowledge of Presidio resources and the continued management and service responsibilities of the NPS within the Presidio (40 CFR §1508.5).

In our role as the cooperating agency, NPS has had opportunities to review and comment on the DEIS during its preparation. We appreciate your having met with us to discuss the planning process instituted by the Trust and issues regarding the scope and content of the DEIS. We provide below our remaining questions and concerns. Additional specific comments are included as an attachment.

Comprehensive Management Plan. The Presidio Trust enabling legislation specifically requires the Trust to prepare a Comprehensive Management Program for Area B of the Presidio (Public Law 104-333, Section 104(c)). We understand that the Trust is now considering the development of this comprehensive plan; however, with the Letterman planning nearly completed, Letterman and other site specific planning (including the Main Post and Public Health Service Hospital) are going forward without the benefit of a broader vision of the overall use and protection of this National Park, including the National Historic Landmark District, and its natural and cultural resources. 61-1

Our most fundamental concern continues to be with the process being established by the Trust to implement development at the Presidio. Without a Comprehensive Management Program, the Trust has chosen to tier the Letterman EIS off of the NPS' 1994 General Management Plan Amendment (GMPA) EIS for the Presidio even though the DEIS for the Letterman Complex

departs in large part from the scale of development foreseen in the GMPA. The GMPA is a broad, Presidio-wide planning document. Accordingly, the assumptions in the GMPA EIS are relevant only when viewed in the context of the Presidio-wide plan it analyzed. If the Presidio-wide planning assumptions have been set aside, the analysis for a specific planning area, such as Letterman, will no longer be an accurate predictor of impacts in the Presidio. That is, the GMPA EIS, as a baseline document, will no longer be applicable to future NEPA analyses, including the Letterman SEIS.

The Trust's choice to use the GMPA EIS as the baseline document from which to tier the DEIS requires, at a minimum, that the DEIS identify and evaluate where the proposed Letterman project is consistent and inconsistent with the GMPA EIS in the context of the Presidio-wide planning assumptions included in the GMPA EIS. The impacts of any and all inconsistencies need to be evaluated, and mitigation for such impacts proposed in the DEIS. 61-1

The DEIS inadequately evaluates the areas of departure from the GMPA EIS and fails to assess many project-specific impacts that do not fall within the scope of the general planning concepts evaluated in the GMPA EIS. The attachment provides a list of the Presidio-wide and region-wide cumulative impacts of the Letterman proposal that have not been evaluated.

National Historic Preservation Act. The National Historic Preservation Act (NHPA) requires analysis of the cumulative effects of development projects on the National Historic Landmark (NHL). Reliance on the GMPA EIS analysis is inappropriate where, as in the Letterman proposal, the land use development concept for the GMPA individual planning area has been substantially changed. Moreover, two significant requirements of the NHPA are triggered by the proposed Letterman project – Sections 106 and 110. These sections require evaluation of all adverse effects of the proposed project on the NHL. As described in the DEIS, Alternatives 2 through 5 would have adverse effects on the NHL and, as such, require notice of such impacts to the Advisory Council. The Trust must consider the Council's comments in reaching the final decision on the proposed project.

Reliance on a draft version of the Planning Guidelines as a mitigation measure is inappropriate; the DEIS provides no information on the Trust's future plans for drafting and adopting the final Planning Guidelines nor on the public's role in such process. While final Planning Guidelines may mitigate some of the proposed project's adverse impacts, the NHPA requires evaluation of the impacts of the proposed project *as currently proposed* (e.g., without application of the Planning Guidelines). Among other things, the impact assessment must consider the placement of the new structures in the NHL and specifically describe the potential impacts. The single admission that Alternative 5 "would not be compatible with the adjacent structures" is not an adequate assessment. Finally, the impacts of the Draft Planning Guidelines are not assessed in the DEIS. Implementation of the Guidelines for the 60-acre planning area would have impacts separate and apart from the proposal currently being considered. A separate alternative analysis and impact assessment for the Guidelines should be prepared prior to their consideration for adoption. 61-2

Additionally, Section 110(a)(1) specifically mandates that, prior to constructing or leasing buildings, each Federal agency shall use, to the maximum extent feasible, historic properties available to the agency. Accordingly, even if the proposed new construction were designed and sited in such a manner that it will not adversely effect the NHL, the NHPA first requires the

preservation of historic buildings through preferential use of historic buildings for new functions over new construction. The historic properties in this NHL should be reused *to the maximum extent feasible* prior to instigating any new development and base all development decisions on a comprehensive building reuse plan for the entire NHL. 61-2

Public Participation In The Trust Decision-Making Process. The NPS appreciates the public involvement that the Trust has afforded in its selection of a tenant for the Letterman Complex. However, though an inadvertent result, the choice to combine tenant selection and NEPA compliance into one parallel decision-making process has muddled the critical requirement of meaningful public participation (and agency review) by seemingly invalidating the relevance of much of the DEIS. With San Francisco newspapers proclaiming Presidio Trust decisions to preliminarily narrow its focus to two finalists and then finally one, the public and the reviewing agencies faced a decision of how to reconcile the press releases and the proposed DEIS that evaluated five allegedly feasible alternative proposals. Though the Trust issued a Federal Register notice extending the review period and reiterated the continued validity of the three rejected proposals, the overwhelming impression of the public is that only one of the alternatives in the DEIS remained viable. 61-3

Having the benefit of hindsight at this stage, the NPS strongly suggests that the Trust decouple these two critical processes for all future development projects at the Presidio to allow the more typical comparative impact assessment of the selected proposal and modified site plans as project alternatives in a Draft EIS. With regard to the Letterman DEIS, at a minimum, the FEIS should include text descriptions, site plans and visual simulations of modified site plans and present the environmental consequences of the modified site plans. We would prefer to see a process to solicit, compile and distribute public comment on new site configurations presented in the FEIS. 61-4

Finally, the following bullets outline a few issues that the NPS believes are particularly important. Additionally, we have provided an attachment outlining a more comprehensive list of issues identified in our review process.

- **Scope of the EIS.** The DEIS contains two proposed actions -- a development proposal for a 23-acre site and a long-range plan for the larger 60-acre site. The preferred alternative (along with all alternatives 2-5) address only 23 acres out of the 60-acre site. And, while general language in the SEIS and the Planning Guidelines describe resources and issues for the 60-acre site, the Letterman proposal only includes the 23-acre construction site and, presumably, will not provide for the use and continued preservation of the historic structures within the 60-acre site. Moreover, the inclusion of the list of "actions common to all alternatives" appears to increase the boundary of the project site to the full 60 acres. However, the implementation of these additional actions are not included in the assessment of each alternative for environmental effects. The actions are listed and then left unresolvec as to impact. This confusion leaves unanswered a critical question: What does this SEIS allow the Trust to do without further environmental/historic preservation analysis? 61-5 61-6

- **Board Resolution 99-11.** The NPS strongly requests that, in order to prevent public confusion, the Trust clearly define the phrase "General Objectives of the GMPA" as a resolution of the Presidio Trust Board (Resolution 99-11), throughout the DEIS. Resolution 99-11 gave the phrase "General Objectives of the GMPA" a specific, very narrow meaning 61-7

which simply cannot be understood without clear presentation. All references to the "General Objectives of the GMPA" should be changed to "Presidio Trust Board Resolution 99-11," which is provided in the DEIS at page 6. This clarification will avoid the natural confusion between Resolution 99-11 and the actual content of the GMPA, specifically the "parkwide principles and concepts" section. 61-7

We have appreciated the cooperation between the Trust and NPS in development of the Draft Planning Guidelines, which is an excellent example of good team work. The NPS would like to implement this level of cooperation on a broader scale in the development/ implementation of future NEPA documents and processes (*e.g.*, participation as part of team in developing impact topics, etc.). We look forward to the establishment of further coordination with the Trust during the design review process for the Letterman Complex and the upcoming NEPA review process on development of the Public Health Service Hospital planning area.

Sincerely,

B.J. Griffin
General Manager, Presidio of San Francisco

cc:
John Berry, Assistant Secretary - Policy, Management, and Budget
Deny Galvin, Deputy Director, NPS
Brian O'Neill, Superintendent, GGNRA
John Reynolds, Regional Director, Pacific West Region

NATIONAL PARK SERVICE
REVIEW COMMENTS
LETTERMAN COMPLEX – DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

NO.	COMMENT	PAGE	SECTION	PARA	
	SELECTION & EVALUATION OF ALTERNATIVES				
1.	In several locations, the DEIS includes the statement that the "GMPA land use concept may no longer be valid." The validity of the Alternative 1 should be determined prior to its inclusion as a project alternative. The Council on Environmental Quality has defined reasonable alternatives as those that are economically and technically feasible (40 Questions 2a). Alternative 1 should meet this test or be included in the discussion of "alternatives considered but rejected."	Title page		¶ 1	61-8
2.	The status of Alternatives 1 and 6 as "feasible alternatives" is unclear given that page 6 states that "The users or tenants must demonstrate an ability to finance the project, including the demolition of the medical center and research institute" and page vii states that the "Presidio Trust has tentatively rejected Alternative 1 and Alternative 6."	iv 6			61-9
3.	The "actions common to all alternatives" described on page 11 are not relevant to the stated need or purpose in the DEIS. According to page 11, all alternatives would include these actions (in the remaining 37-acres of the 60-acre site). The DEIS should explain how these actions fit into the need "to achieve the Presidio Trust Act's mandate that the Presidio Trust be financially self-sufficient by 2013, while managing the Presidio in accordance with the general objectives of the GMPA,...[and] to develop and use mixed use buildings totaling approximately 900,000 square feet within a 23-acre site within the Letterman Complex."	3. 11.	1.2, 2.0	2	61-10
4.	The inclusion of this list of "actions common to all alternatives" increases the scope of each alternative. However, the effects of these additional actions is not included in Chapter 4; this chapter should address the impacts of the full scope of each proposed alternative, including the list of common actions.	11.	2.0		61-11
5.	For each alternative that includes reuse of the basement structures, the DEIS should indicate the allowable total new construction by subtracting the retained square footage of the basements.	12 *ff.*	Table 1		61-12
6.	Include a comparison of alternatives in terms of site plan, density, height, site coverage, etc.	80 *ff.*	Table 9		61-13
7.	State the total available Presidio housing under each alternative, including units to be constructed.	80 *ff.*	Table 9		61-14
8.	The selection of a preferred alternative during the public review process does not afford the public and agencies the opportunity to review and comment on a reasonable range of alternatives to that selected alternative that would typically be included in a DEIS as project alternatives. The FEIS should include text descriptions, site plans and visual simulations of modified site plans and present the environmental consequences of the modified site plans. The Presidio Trust should consider a process to solicit, compile and distribute public comment on new site configurations presented in the FEIS.		Chapter 2		61-15
9.	Need for a Visual Impact Analysis. The Environmental Screening Form (Appendix A) states that impacts on scenic viewing require further analysis in the DEIS and the Draft Planning Guidelines are even presented as mitigation for potential scenic resource impacts. However, the impact analysis for scenic viewing was not included in the DEIS. No graphics were presented to illustrate the visual impact of the various alternatives from the prospective of sensitive viewpoints.		Chapter 4		61-16
	CUMULATIVE IMPACTS – AREA OF POTENTIAL EFFECT (APE)				
10.	Edit sentence, as follows: "The *60-acre planning* area contains approximately 1.3 million square feet in 50 buildings."	iii	Intro.	¶ 2	61-17

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NO.	COMMENT	PAGE	SECTION	PARA	
11.	The cumulative scenario used as the baseline for the assessment of each cumulative effect in the DEIS should be established by the foreseeable level of development currently anticipated by the Trust (e.g. PHSH and Main Post plans) rather than the GMPA EIS development levels.		Chapter 2		61-18
12.	For each alternative, the assessment of cumulative impacts Presidio-wide and region-wide needs further analysis. Of particular concern are cumulative impacts to: 1) traffic congestion on U.S. Highway 101, 2) traffic levels in the Presidio between Golden Gate Plaza and the development site, 3) parking capacity in Area A, 4) parking in the adjacent neighborhood and the Exploratorium, 5) viewshed Presidio-wide, 6) future restoration of the Tennessee Hollow riparian corridor, 7) water supply Presidio-wide, and 8) water quality in Crissy Marsh.		Chapter 4		61-19
	ECONOMICS /900,000 SF CONSTRUCTION				
13.	State the basis for using the 900,000 square foot figure as the allowable new construction level.	iii, 3	Purpose & Need	¶ 3	61-20
14.	The purpose and need should be expanded to include justification and need for demolition of LAIR.	iii, 3	1.2		61-21
15.	Support the statement that 900,000 sf is the minimum amount of new construction required to achieve economic self-sufficiency.	45	2.8.1	¶ 5	61-22
	"GMPA OBJECTIVES"				
16.	"The Presidio Trust manages . . . in accordance with the purposes of the Act establishing GGNRA and the **general objectives of the Presidio General Management Plan Amendment (GMPA) adopted by the National Park Service in 1994**." (bold for emphasis) Because of the structure of this sentence, it appears that the NPS adopted the Presidio Trust Resolution 99-11. Reword sentence.	iii ff.	Summary	¶ 1	61-23
17.	Throughout the document there are references to the "GMPA's general objective to sustain the Presidio indefinitely on an economic basis". This statement does not occur in the GMPA. The reference here and elsewhere should be changed to Presidio Trust Resolution 99-11.	vii 81	Major Conclusions	¶ 1	61-24
18.	"This process produced the 150-page Presidio GMPA, whose general objectives guide the discretion of the Presidio Trust, as well as a 394-page EIS on the Presidio GMPA". This statement implies that Resolution 99-11 guides the GMPA EIS. Rephrase sentence.	xii	Issues to be Resolved	¶ 1	61-25
	CULTURAL RESOURCES				
19.	For each Alternative (1 through 5), the impact assessment for the effect on historic buildings should specifically describe the effect, whether beneficial or adverse, for each alternative. The DEIS must explain *why and how* "new construction would unify the disjointed remnant historical hospital buildings within the ~~23-acre site~~ 60-acre site, and reestablish east/west corridors and viewsheds within the site...." and "have a beneficial effect on the NHL district". This comment applies to each of the eight sections in this Chapter.	ix, 117, 136, 146, 156, 166	Major Conclusions (NHL) and 4.1.8.1 through 4.5.8.1		61-26
20.	In their present form, alternatives 2 through 5 do not conform to the land use planning directives in the Draft Planning Guidelines. Judging from the site plans in the DEIS, an adverse effect would result from Alternatives 2 through 5 without the mitigation afforded from the Draft Planning Guidelines. The DEIS should assess and evaluate these impacts before the Mitigation Measure CR-1 is applied. The mitigative effects of applying CR-1 must be explained. The mere conclusion that application would provide protection is unsupported. The DEIS should provide text description and modified site plans for alternatives 2	Chapter 4	4.2.8 through 4.5.8		61-27

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NO.	COMMENT	PAGE	SECTION	PARA	
	through 5 to demonstrate the protection afforded by Mitigation Measure CR-1.				61-27
21.	Change "An undertaking is defined to include federal actions such as new development and uses within the Letterman Complex . . ." to "An undertaking is defined to include federal actions that can result in changes to the character or use of historic properties, such as new development . . . within the Letterman Complex."	116	4.1.8	¶ 1	61-28
22.	Clarify the finding of adverse impact to Bldgs 1160 and 1151 (and 1152) from the new road between those structures for each alternative. Support conclusion of no adverse effect from this road on the streetscape or the NHL status.	Chap 4 136,146, 156-7, 166	4.2.8 – 4.5.8 and 4.2.8.7 - 4.5.8.7		61-29
	NATURAL RESOURCES				
23.	Confirm whether the outfall from the Letterman Complex will drain directly to the restored Crissy Marsh. Mitigation Measure WQ-1 should clearly state that oil and grease traps would be installed at all catchbasins in the stormwater drainage system.	vii 35	Major Conclusions	¶ 4	61-30
24.	Begin with "An existing historic drainage on the site is planned for restoration. This drainage will flow into the Crissy Field marsh." The DEIS should state here that the landscaping designs for the site include restoring the stream corridor, maintaining stormwater runoff water quality through bio-filtering, and assuring a stream corridor buffer area. The buffer width should be supported by information from technical experts. Clarify the responsibility for implementation of the stream corridor restoration.	ix, 18, B-27, B-37	Major Conclusions 2.0 (Bullet 2) Fig. B-10, Fig. B-11	¶ 4	61-31
25.	As the alternatives include common elements that affect the full 60-acre planning area, add a new section to Chapter 3, Affected Environment, describing the natural resources. Included in this section should be: the hydrologic environment, (*i.e.*, the water tables and the past creek corridor); the existing native oaks; bird nesting information and the values of the palms for birds; bats; the Crissy Marsh and the need to have fresh water inflow but also clean water; and, the water from Lobos Creek being used for the potable water on site.	77	Chapter 3		61-32
26.	Support the statement "The SWPPP would reduce the quantity of stormwater discharged to San Francisco Bay and Pacific Ocean from the site" by stating how and why.	A-7	Storm Drainage (SD-1)		61-33
27.	Instead of stating that this project has no impact on the riparian corridor restoration, it is more appropriate to commit to supporting the restoration plan and participating in its implementation, as part of the project. In the *landscaping plan* section, add that the plan would include the corridor.	A-13	P. Native Plant Communities		61-34
28.	Add the riparian corridor and buffer to these maps.	B-15, B-18	Fig. B-10, Fig. B-11		61-35
29	Add natural drainage restoration.	B-27	Bullet 2		61-36
	HOUSING				
30.	Indicate total Presidio housing units available under each alternative and provide basis for such calculations.	55, 82 93, 105 D1-2	3.7, Table 9, Table 13, 4.1.5-4.8.5, Appendix D		61-37
31.	What is the current total of housing units in the Presidio? What is the current number of housing units proposed by the Trust? These numbers should form the basis for the cumulative impacts assessment.	55	3.7.1		61-38

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NO.	COMMENT	PAGE	SECTION	PARA	
	TRANSPORTATION AND TRAFFIC				
32.	For each Alternative (1 through 5), transportation and traffic impacts must be assessed and, if significant impacts are identified, then the level of effectiveness of each proposed mitigation measure must be assessed in clear, quantifiable terms. For example, the effectiveness of the Transportation Demand Management Plan (TDMP) is not addressed. The TDMP is described only in concepts (p.37). There is no evidence of the level of traffic reduction nor that demand would be reduced to a level of less than significant effect.	111	4.1.7.3.		61-39
33.	The traffic impact analysis for Alternatives 2 through 5 relies on the assumption that two new signalized intersections will be constructed on Doyle Drive. NEPA calls for analysis of effects of the projects, as proposed (e.g. unmitigated, under current road configurations). Only after this analysis, should appropriate mitigation be considered. Both the mitigative effects and the adverse impacts of all proposed mitigation must be evaluated (e.g. TR-1, TR-2, TR-3), including construction impacts. The feasibility of the proposed mitigation measures should be considered. For example, DEIS states that the San Francisco Dept. of Parking and Traffic "generally concurred with the plans" for the improvements to Richardson Avenue. It is important to obtain conceptual approval in writing from both the City and Caltrans.	181	5.2.8.		61-40
34.	There is a need for a section that addresses the overall transportation impacts Presidio-wide. The following topics should be addressed: access, trip distribution assumptions, and impacts to the surrounding neighborhoods.	83	Table 9		61-41
35.	The effects of parking fees on other Presidio sites, including Area A, and adjacent neighborhoods needs to be assessed for impacts and mitigation thereto.	94	Table 14		61-42
36.	Clarify jurisdictional boundaries between Presidio, City and Caltrans.	23,26, 30,33, 106 ff.	2.2.5, - 2.5.5, 4.1.7, etc.		61-43
37.	Indicate which way the traffic will flow at the new one-way access between Gorgas and Richardson. Show the direction of travel in the figures for Alternatives 2-5.		Fig. 6-9, 14		61-44
38.	Provide analysis of the impacts on the Exploratorium from the proposed new signals on Richardson Ave.		4.1.7 thru 4.6.7		61-45
39.	Clarify why two new intersections are needed. A complete impacts analysis of the project, as proposed, would provide this clarification.	108	4.1.7	¶ 1	61-46
40.	Describe the current and future use of Girard Road and include in the impact assessment.		Chapter 2, 3, 4		61-47
41.	Show the location of surface parking for each alternative, including on-street parking locations.		Fig. 6-9		61-48
42.	Indicate percentage applied to parking share based on "the 23-acre site's share of developed area for the entire complex."	108	4.1.7	¶ 3	61-49
43.	As the effectiveness of TDM and TR-4 measures to reduce parking demand has not been estimated, indicate expected impacts if TDM and TR-4 measures fail. Where might additional parking occur? How will neighborhoods and other Presidio locations be protected from undesirable parking impacts due to Letterman?		4.1.7.3 and 4.2.7.6 through 4.5.7.6.		61-50
44.	Provide a figure showing existing condition traffic volumes on the regional access routes and major roads within the Presidio.	60	3.9.2		61-51
45.	Provide peak a.m. data as well as peak p.m. data conditions throughout the document. It is important that both levels be fully documented and	66, 94-96,	Table 4, Tables 14-		61-52

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NO.	COMMENT	PAGE	SECTION	PARA	
	analyzed throughout the DEIS. Provide existing and project Level of Service (LOS) data for each approach, as well as overall intersection conditions. It is desirable to be able to determine LOS provided on the Richardson Avenue approaches and side approaches separately.	111	16, 4.1.7.2		61-52
46.	Provide information for anticipated traffic volumes on Gorgas, Lombard, Letterman, O'Reilly and Torney for each alternative.	111, 133, 145, 155, 165	4.1.7.1 - 4.5.7.1.		61-53
47.	Provide LOS information for important perimeter intersections with major Presidio roads under each alternative (such as: Letterman/Lombard under Alt. 2, Edie/Gorgas under Alt. 3, etc.)	page 96 and Chapter 4	Table 16 and discuss 4.2.7.2. through 4.5.7.2.		61-54
48.	The same trip generation rates should be used for CNET and Lucasfilm. What is the justification that CNET is assigned "Office use" generating 18.10 person-trip rate per person, while Lucas is assigned "R&D" generating 11.42 person-trip rate?	D-3	Appendix D		61-55
	WATER SUPPLY				
49.	NEPA calls for analysis of effects of the projects, as proposed (e.g. unmitigated, considering current water supply). Only after this analysis, should appropriate mitigation be considered. Both the mitigative effects and the adverse impacts of all proposed mitigation must be evaluated, in quantitative terms where appropriate.		4.1.3 through 4.5.3		61-56
	AIR QUALITY				
50.	Provide information regarding the effect on air quality of adding two new signals, as well as new access to Richardson Ave/Doyle Drive – consider immediate local effects as well as area-wide/regional effect.	139, 147, 157, 167	4.2.9, - 4.5.9,		61-57
	NOISE				
51.	Provide information regarding the effect on noise of adding two new signals, as well as new access to Richardson Ave/Doyle Drive – consider immediate local effects as well as area-wide/regional effect.	139, 148, 158, 168	4.2.10 - 4.5.10,		61-58
	PLANNING GUIDELINES				
52.	The Draft Planning Guidelines address a larger study area than the 23-acre project site described on the title page and elsewhere in the DEIS. The impacts of adoption of the Draft Planning Guidelines for the 60-acre site are not assessed in the DEIS. Adoption of the Guidelines would have impacts separate and apart from the proposal currently being considered. A separate alternative analysis and impact assessment for the Guidelines should be prepared prior to their consideration for adoption or use as a mitigation measure.		Chapter 4		61-59
53.	The analysis in the main body of the DEIS repeatedly states that all alternatives conform to "the GMPA's key restrictions on maximum allowable square footage for the [60-acre] complex" (DEIS p. 99). But the Draft Guidelines do not adopt this key restriction. The Guidelines should be amended to reflect the 1.3 million square foot restriction used as in the main body of the DEIS for the entire 60-acre planning area. If not so amended, the FEIS should not refer to project conformance with this key restriction in the GMPA and should address the effects of nonconformance.	99,129, 141,151, 161, 171	4.1.1.2. through 4.5.1.2. and Appendix B		61-60
54.	"Planning Guidelines for the site will direct all replacement construction." Planning Guidelines should be applied to the preferred alternative to produce a "Planning Guidelines preferred alternative" (PGPA). This PGPA would demonstrate the concepts of the "O'Reilly Commons" and preserve viewsheds while integrating the project with	7	1.3.7	¶ 3	61-61

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NO.	COMMENT	PAGE	SECTION	PARA	
	the historic complex. The Guidelines state that "New Buildings which border the commons should present an inviting public face to this green space." The green space, roughly 85 feet wide, "is a significant and usable space" that makes a transition to the new development. The PGPA should incorporate, to the fullest extent, the environmental and design measures listed under the six heading topics of the Planning Guidelines.				61-61
55.	The Planning Guidelines are attached to the DEIS as an appendix in draft form implying that the Guidelines can be subject to further modification. The Guidelines are also presented as Mitigation CR-1 which "would ensure that any undertaking is in keeping with the character of the historic district." To be judged for effectiveness and feasibility of implementation, the Guidelines should be final rather than in flux. Describe how the planning guidelines, Measure CR-1, will be finalized and adopted as part of the EIS process.	37	2.6.6.		61-62
56.	Improve Guidelines by providing additional illustrations, such as north-south and east-west section cuts to show topography and building heights (both Presidio and city contexts), and photos showing views into and out of Letterman, including simulations of proposed development per the guidelines.		Appendix B		61-63
	GENERAL COMMENTS				
57.	The Title Page should describe the specific action(s) under consideration by the Presidio Trust that is the subject of this DEIS.	Title page		¶ 3	61-64
58.	Explain within the first paragraph that the Presidio Trust is a federal government corporation, established to manage the Presidio.	iii	Summary/ Introduction	¶ 1	61-65
	ALTERNATIVE 1				
59.	Provide information for the impacts of Alternative 1 actions only – information about and comparisons to actions under other alternatives should not be included in this analysis.	18 ff.	Throughout 4.1		61-66
	ALTERNATIVE 2				
60.	Building B is identified as "withdrawn" – provide use for building or delete from proposal.	22	Figure 6		61-67
61.	Additional Potential Adverse Effects to be assessed and mitigation with this alternative include: • Does not provide O'Reilly buffer zone • Proposal closes off Gorgas Ave/Lyon St connection • Views into site from the east are blocked • Gorgas edge is amorphous, not defined by strong (building) edge • Design has awkward circulation at new Gorgas Ave entries • There is minimal connection to the historic clusters (Thoreau Center, Thornburg/Edie)		4.2.8		61-68
	ALTERNATIVE 3				
62.	As the housing provided under this alternative is restricted to assisted living and nursing facilities, the jobs/housing balance envisioned under the GMPA would not be achieved.	142	4.3.1		61-69
63.	Additional Potential Adverse Effects to be assessed and mitigation with this alternative include: • Does not provide O'Reilly buffer zone • Scale of buildings along O'Reilly is too large, too solid • Plan has awkward circulation/connections at Lombard/Letterman and O'Reilly/Gorgas • Plan shows poor termination of Thornburg Ave; no connection between new and historic structures		4.3.8		61-70

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NO.	COMMENT	PAGE	SECTION	PARA	
	• Gorgas edge is amorphous, not defined by strong (building) edge • There is minimal connection to the historic clusters (Thoreau Center, Thornburg/Edie)				61-70
	ALTERNATIVE 4				
64.	Additional Potential Adverse Effects to be assessed and mitigation with this alternative include: • Plan has awkward circulation/connections at Lombard/Letterman and O'Reilly/Gorgas • Plan shows poor termination of Thornburg Ave; no connection between new and historic structures • "Formal entry" (G) does not appear particularly formal, nor is it clearly a/the main entry • Scale of office buildings is large, too solid • North/south connections through the site are awkward, particular at the residences (from Lombard onto residential street) • There is minimal connection to the historic clusters (Thoreau Center, Thornburg/Edie)		4.4.8		61-71
	ALTERNATIVE 5				
65.	For alternative 5, the scale of new construction "would not be compatible with the adjacent structures". This impact should be further described as to distance, screening, changes to access, landscape, building heights, pedestrian experience, etc. The application of Mitigation Measure CL-1 (the Planning Guidelines) would "increase the size of the greensward ...to minimize the potential for an adverse effect." To indicate the effectiveness of CL-1, provide specific language describing the changes to the site plan. See also, Comments Nos. 52-56.	Chapter 4	4.5.8		61-72
66.	Additional Potential Adverse Effects to be assessed and mitigation with this alternative include: • Does not provide O'Reilly buffer zone • O'Reilly edge is impenetrable (single building, no paths to center of site). East/west views are entirely blocked. • Plan has awkward circulation/connection at O'Reilly/Gorgas • Character of the "great lawn" is inappropriate; seems more of a discrete urban park than integrated open space. • Gorgas edge is amorphous, not defined by strong (building) edge • There is no "public zone" at the south edge (Letterman/Lombard) • There is minimal connection to the historic clusters (Thoreau Center, Thornburg/Edie)		4.5.8.		61-73
67.	Conformance with *Planning Guidelines*, general questions: • Information needed showing topography, building heights – provide sections • Provide view simulations both into and out of site, including roofscape views (as from upper Lyon/Simonds Loop) • Information needed regarding final density across entire Letterman complex • Information needed regarding demolition and construction elsewhere in Letterman, Tennessee Hollow restoration		4.5.8.		61-74
	ILLUSTRATIONS, MAPS, FIGURES				
68.	There are now fewer than 870 buildings in the Presidio – provide the current total.	49	3.1	¶ 1	61-75

NATIONAL PARK SERVICE
REVIEW COMMENTS
LETTERMAN COMPLEX – DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

NO.	COMMENT	PAGE	SECTION	PARA	
69.	Provide a map that shows the secondary roads mentioned in the text including Thornburg, Edie, Torney and Girard.		Chapter 3		61-76
70.	Provide section analyses, showing current and proposed cross-sections through the site. Include information extending from the east side of Lyon St (neighbors) through the historic hospital complex (Thoreau Center) along the east-west axis, and from the Gorgas Ave warehouses up to Lombard St along the north-south axis.		Chapter 4		61-77
71.	Buildings 1029 and 1030, as well as several other structures, are shown in the site plan in a hatched line. Add this line type to the legend of all the figures. In Figure 4, Several buildings shown as "to be demolished" have already been demolished.	5-44	Figs. 3-10		61-78
72.	The definition of "infill" given in glossary should be expanded upon to include the meaning of the word in the context of historic preservation as used in sentence 4. New development that is infill in a historic district should attempt to reflect the footprint and dimensions of the historic district.	v	Summary	¶ 1	61-79

Responses to Comments in Letter 61

61-1

As is set out in master response 2A, the GMPA remains the guiding planning document for the portions of the Presidio under the Trust's jurisdiction. Therefore, the GMPA EIS continues to be applicable to future NEPA analysis, including this Letterman Complex Supplemental EIS. That being the case, certain of the commentor's assumptions reflect an unjustified concern. For further response to comments concerning the propriety of tiering the Letterman Complex EIS from the GMPA EIS, refer to master response 1D; and concerning the need to develop a comprehensive plan before going forward with the proposed project, refer to master response 4A.

61-2

First Paragraph – In response to this and other comments, the text at the end of each discussion of alternatives within Section 4, Environmental Consequences, of the Final EIS now includes an analysis of the cumulative effects of development projects on the National Historic Landmark (see master response 4B). The EIS preparers disagree with the commentors that the analysis should not tier from the GMPA EIS. Far from having set aside the planning assumptions for the Letterman Complex planning area, the GMPA remains the foundation and the comprehensive plan for all Presidio planning decisions, and the GMPA EIS still provides an adequate description of the broad effects of Presidio-wide future development. Therefore, the GMPA EIS remains applicable to future NEPA analysis, including the NEPA analysis in this Letterman Complex Supplemental EIS (see master response 1D). For further discussion of how the preferred concept for the site does not represent a substantial change from the GMPA, see master response 2A and Section 4.5.1.2 of the EIS.

Second Paragraph – The Presidio Trust fully intends to meet its obligations regarding Sections 106 and 110 of the NHPA. See master responses 1A, 1B and 1C. All adverse effects on historic properties of Alternatives 2 through 5 have been evaluated in Sections 4.2.8 through 4.5.8 (Cultural Resources) of the EIS. A copy of the Draft EIS was sent to the Advisory Council on April 19, 1999. Prior to the submittal of the document (June 10, 1999) and upon the recommendation of the Advisory Council, the Presidio Trust met with the Council and others to visit the 23-acre site and identify issues related to historic properties. The Council chose not to comment on the Draft EIS, but the Presidio Trust will continue to consult with the Council before the final decision is made and through implementation of the Letterman Complex Programmatic Agreement (see Appendix F of the Final EIS).

Third Paragraph – Refer to master response 7A.

Fourth Paragraph – In response to this and other comments, the text in Sections 4.2.8 through 4.5.8 have been revised to include additional analysis of the effects of the alternatives, as proposed, on cultural resources and their significance.

Fifth Paragraph – Refer to master response 7A.

Sixth Paragraph – The Presidio Trust has assumed responsibility for the preservation of the historic properties under its management in the Presidio and is complying with Section 110 of the NHPA in its actions with respect to these historic properties. The Trust has completed the rehabilitation of numerous historic and non-historic buildings elsewhere in the Presidio and has made rehabilitation of existing properties a priority. For the proposed project, no historic buildings are located in the 23 acres currently proposed for development. As is consistent with the mission of the Presidio Trust, new construction at this site is being pursued both in order to meet the statutory mission of economic self-sufficiency by the year 2013 (see master responses 10A and 10B) and to satisfy the GMPA plan which called for demolition of LAMC and new replacement construction.

61-3

A complete explanation of the Trust's process for identification of a preferred alternative is provided in Section 5.2, Preferred Alternative Selection Process, of the Final EIS where the Trust acknowledges the confusion caused by its press announcements. In the future, the Trust will make every effort to avoid similar confusion by more carefully drafting its press releases. For further response to the comment concerning the apparent pre-selection of an alternative, please refer to master response 6B. For response to comments concerning combining tenant selection and NEPA analysis into one process, refer to master responses 1D and 6A. For further discussion as to how the Trust has provided, rather than muddled, meaningful public participation, please refer to master response 1E and Section 5.1 of the Final EIS.

61-4

The Trust acknowledges NPS's suggestion about how to structure the NEPA assessment for its future Presidio projects. No commitments as to how to proceed with future NEPA assessments are needed for purposes of this EIS. For further discussion of the reasons supporting the Trust's alternative selection process and the adequacy of the range of alternatives, please refer to master response 6A. For further discussion as to how the Trust has provided meaningful public participation, please refer to master response 1E and Section 5.1 of the Final EIS. With regard to the request for modified site plans, and visual simulations and additional analysis of those plans, please refer to master response 24. Concerning public involvement in the design review process for revised site plans, see master response 7B.

61-5

The premise of this comment is incorrect. As discussed on the Cover Sheet, the Summary (page iii), and Section 1 (Purpose and Need) of the EIS, the project would focus development within the 23-acre site. It is consistent with NEPA to have focused the scope of the proposed project on the 23 acres. Furthermore, this Final EIS presents rational reasons for and thoroughly studied the effects of focusing the development within the 23-acre site. See master response 6A with regard to the 23-acre site within the 60-acre context. For purposes of comparing the magnitude of impacts of Alternatives 2 through 5, which would limit development to the 23 acres, the Science and Education Center (Alternative 1 in the EIS) contemplates and approximates an intensity of development on the 60 acres as is envisioned in the GMPA. Alternative 1 would allow for infill development within the larger 60-acre complex in areas that were not specifically defined in the GMPA EIS. Alternative 1 thus provides an important baseline to show the effects of spreading the density across the

complex as compared to retaining the entire development within the 23-acre site. Please refer to master responses 1D, 2A, and 6A for additional discussion of the 23-acre site.

There is absolutely no basis for the assertion that the Presidio Trust would not provide for the re-use and continued preservation of the historic structures within the 60-acre complex.

61-6

The Presidio Trust apologizes for any confusion that this list may have caused. The list was merely intended to provide a full environmental context for the discussion of impacts which focuses on the 23-acre site (see response to comment 61-5 above). In response to this comment, the list and Figure 4, Actions Common to All Alternatives, which appeared in the Draft EIS, have been deleted from the Final EIS.

61-7

The General Objectives of the GMPA have been identified by the Trust in Presidio Trust Board Resolution 99-11 and are provided in Section 1.1.5 of the EIS. The Final EIS clearly states that the General Objectives of the GMPA are not explicitly identified in the text of the GMPA and incorporates detailed discussion in the Summary, Section 1.1.5, and in master responses 3A and 3C explaining the Trust's process for ascertaining the General Objectives of the GMPA. Confusion, if any, between Resolution 99-11 and the "actual content of the GMPA" would not be avoided by the proposed modification, and has been adequately addressed through these added discussions.

61-8

Given the history behind Alternative 1, it would be inappropriate to reject this alternative. The specific user contemplated by the NPS is no longer available, but the alternative is still viable because it provides an analysis of what the GMPA anticipated would be the baseline or preferred use within the Letterman Complex. The Presidio Trust's preferred alternative perpetuates the GMPA baseline rather than proposing a drastic change from it. For clarity, the statement regarding its validity has been deleted from the Final EIS.

61-9

See response to comment 61-8 regarding Alternative 1. As required by NEPA, Alternative 6 warrants consideration because it serves as a benchmark to compare the magnitude of environmental impacts of Alternatives 1 through 5. For clarity, the statement on page xiii of the Draft EIS has been deleted from the Final EIS.

61-10

Such an explanation is not warranted, since in response to the comment, the list has been deleted. See response to comment 61-6.

61-11

See response to comment 61-6.

61-12

Please refer to master response 11 with regard to inclusion of square footage for structured parking. Since none of the alternatives propose reuse of the basements for habitable programs, the requested square footage

adjustments have not been added to the Final EIS. The total proposed construction square footages are included in each description of the alternatives in Section 2.

61-13

Table 9 provides sufficient information to allow a meaningful comparison of alternatives.

61-14

The total housing figures provided in the cumulative impacts analysis for each alternative (Sections 4.1.11.4 through 4.6.11.4–Housing) address this comment.

61-15

The comment concerning selection of a preferred alternative during the public review process is addressed in master response 6B. The comment concerning the adequacy of the range of alternatives considered is addressed in master response 6A. The comments concerning the need to include and analyze modified site plans and visual simulations are addressed in master responses 23 and 24. For comments concerning public involvement in the design review process for revised site plans, see master response 7B.

61-16

In response to this comment, additional text, provided in Sections 4.1.8.4, 4.2.8.6 through 4.5.8.6, and 4.6.8.4 (Visual Impact), has been added to provide visual impact analysis for each alternative. Graphics have also been added which present a comparative analysis of views for Alternatives 1 through 5 (Figures 20 through 24.) The standards used for identifying significant impact are provided at the beginning of Section 4.1.8. Concerning the need for photosimulations, please refer to master response 24.

61-17

The text has been revised to respond to the comment.

61-18 AND 61-19

Refer to master response 4B.

61-20

Refer to master response 11 for derivation of the proposed building area.

61-21

In response to the comment, the text of Section 1.2 of the EIS has been revised to include an explanation of the justification and need for the demolition of LAIR.

61-22

Refer to the Financial Management Program in Appendix E of the Final EIS, and master responses 10A and 10B.

61-23

In response to the comment, the text has been reworded for clarity.

61-24 AND 61-25

Refer to the response to comment 61-7.

61-26

Please refer to master response 23 with regard to the effects on the historic setting. In response to the comment, the text in Sections 4.1.8 through 4.5.8 has been revised to specifically describe the beneficial and adverse effects of each alternative on the historic setting. Text has also been added to further address the visual impacts of each alternative.

61-27

To respond to the commentor's concern, inconsistencies with the Planning Guidelines have been analyzed and any adverse effects have been identified in the Final EIS in Section 4, Environmental Consequences. Please refer to master response 7A with regard to the applicability of the Planning Guidelines.

61-28

According to CFR800.16(y), an undertaking is defined as "a project, activity or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; those acquiring a Federal permit, license or approval; and those subject to state or local regulation administered pursuant to a delegation or approval by a Federal agency." Section 4.1.8 of the Final EIS has been revised to reflect this new adopted definition of an undertaking.

61-29

Refer to master response 23.

61-30

The text of mitigation measure WQ-1, *Implementation of Best Management Practices*, has been revised to include oil and grease traps.

61-31

Restoration of Tennessee Hollow is a separate project subject to detailed planning and additional environmental analysis. The text change may confuse the reader and therefore has not been incorporated into the Final EIS. However, applicable portions of the recommended text have been incorporated into new mitigation measure SD-1, *Protection of Tennessee Hollow*, which would ensure that potential infill construction associated with Alternative 1 would not interfere with future restoration of the stream drainage. Alternatives 2 through 5 would have no effect on the stream drainage.

61-32

With the exception of water from Lobos Creek, these elements would not be affected under any alternatives currently being considered (see response to comments 61-6 and 61-31, and master response 4B). Therefore, the requested descriptions in the Affected Environment section of the EIS would be unnecessary. For a discussion of Lobos Creek water supply, please refer to Section 3.5.1 of the EIS.

61-33

The SWPPP would only protect water *quality* and would not reduce the quantity of storm water. In response to the comment, the statement has been deleted from the text of EIS.

61-34

The Presidio Trust is fully committed to supporting the restoration plan for the riparian corridor along the western edge of the 60-acre Letterman Complex. However, as mentioned by the commentor, the corridor is outside the boundary of the 23-acre site and would not be disturbed as a result of proposed development under Alternatives 2 through 5. Furthermore, new mitigation measure SD-1, *Protection of Tennessee Hollow* would ensure that any infill development associated with Alternative 1 within the remainder of the complex would not interfere with future restoration of the stream drainage. Therefore, incorporation of the riparian corridor into the landscaping plan, which would only apply to the 23-acre site under the preferred alternative, would be difficult to legally impose upon the proponent of that alternative should it be selected.

61-35

These maps have been amended as requested to show the corridor.

61-36

The text has been added as noted in the response to comment 61-31.

61-37

As discussed in Appendix D, page D-2, each alternative is assumed to use 265 of the existing Presidio housing units to meet the housing demand generated by the alternative. In addition to this portion of the existing housing, the new housing units, if any, proposed in each alternative are available to meet the housing demand. The following table summarizes the derivation of the housing available to each alternative that is used in Table 15.

ALTERNATIVE	PROPOSED NEW HOUSING UNITS	ALLOCATED SHARE OF EXISTING PRESIDIO HOUSING UNITS	TOTAL HOUSING UNITS AVAILABLE UNDER ALTERNATIVE
Alt. 1	0	265	265
Alt. 2	400	265	665
Alt. 3	0	265	265
Alt. 4	450	265	715
Alt. 5	0	265	265
Alt. 6	0	265	265

61-38

As shown in Exhibit 1 of the FMP in Appendix E of the Final EIS, in June 1998 there were 1,119 housing units and the proposed future condition includes 1,598 housing units at the Presidio. The increase in units is a result of the conversion of existing dormitory/barracks square footage to housing units. Subsequent to the preparation of the FMP, the Trust verified a count of 1,116 housing units, which would result in a future condition of 1,595 units. As of September 1999, 724 housing units were occupied and the Presidio Trust is in the process

of readying the remaining units for occupancy.

The EIS housing impact analysis included 188 dormitory housing units in its assessment of existing housing units. These are the units in buildings 1028, 1029, and 1030 which are either in current use for housing or under lease for re-use as housing. Thus, as discussed in Appendix D of the EIS, the existing housing units used as the basis for the housing impact assessment was 1,304. This value is less than the full 1,595 projected in the FMP as it only includes the currently committed portion of dormitory expansions. By conducting the housing analysis on committed projects only, the analysis is more conservative than it would be if more barracks/ dormitory conversions were included.

The housing impact analysis for each scenario assumed that 265 of the existing units were available to meet the housing demand created from the employment associated with each alternative (as discussed in Appendix D). If the housing impact analysis had been prepared using the proposed future conditions at the Presidio, with 1,595 housing units in the existing building stock plus the new housing proposed for each alternative, the impacts on the regional housing markets would be less for each alternative. By only including the housing stock currently available for housing use, rather than the expanded future housing condition, the Draft EIS is conservative in its assessment of the cumulative impacts of the additional housing demand generated by each alternative. Refer to response to comment 46-9.

61-39

Transportation and traffic impacts are assessed for each alternative and mitigation measures TR-1 through TR-3 have been developed to mitigate these impacts to a less than significant level. Refer to master response 19 for comments regarding TDM.

61-40

The reference to NEPA in the comment is not necessarily accurate. Under NEPA, actions may be analyzed either with or without mitigation (CEQ Regulations Sections 1502.14(f) and 1502.16 (h)). Refer to master response 18 for the description of the process required for Caltrans approval. Caltrans cannot give conceptual written approval until a Project Study Report has been prepared and city approval would not be meaningful without concurrent Caltrans approval.

61-41

These topics are addressed in the Transportation Technical Report (Wilbur Smith Associates 1999). Also, refer to the individual cumulative analysis traffic and transportation sections at the end of each discussion of alternatives in Section 4 of the Final EIS. The trip generation analysis in the EIS and Technical Report forecasts slightly fewer vehicle trips from the Letterman Complex than were forecast in the 1994 GMPA. Consequently, the traffic analysis in the 1994 GMPA EIS presents a valid and slightly conservative overview of Presidio-wide transportation impacts.

61-42

See master response 20 for neighborhood parking impacts. Regarding Area A, the preferred alternative has sufficient parking supply to accommodate demand onsite, and parking fees are not proposed. Consequently,

there would be no demand for parking in Area A from the tenant of the 23-acre site. In addition, the Trust will be working with the NPS to develop mutually agreeable restrictions on parking on Crissy Field (through either enforcement of time limits or other restrictions) that would effectively prevent Area B employee parking in Area A. The latter restrictions would be of increased significance for alternatives where parking fees on the 23-acre site are proposed.

61-43

The city owns the Richardson Avenue right-of-way east of the western boundary of Lyon Street and the Palace of Fine Arts property. The State (Caltrans) has been permitted the Richardson Avenue right-of-way (essentially the street width) west of that point. The federal government retains ownership of the remainder. A right-of-way map will be produced during the Project Study Report study and a copy will be forwarded to the NPS.

61-44

In response to the comment, refer to Figure 15 which shows direction of traffic flow at the reconfigured Gorgas Avenue/Richardson Avenue intersections. Also, Figures 4, 5, 6, 7, 8, and 9 have been revised to indicate entrance and exit points into the 23-acre site and principal internal traffic routes for each of the alternatives. No further information about direction of travel on the streets within each alternative can be provided or is warranted at this time.

61-45

Refer to master response 18.

61-46

See master response 18.

61-47

Girard Road currently provides access from the Main Post to the Thoreau Center parking lot and to dormitories and the new Swords to Plowshares program. It is proposed to retain this function in the GMPA and no changes are proposed as part of current planning for the Letterman Complex.

61-48

In response to the comment, locations of surface parking lots have been denoted on the site plans for each alternative. Street parking in anticipated under Alternatives 1, 2, and 4, but planning for these alternatives is too preliminary in nature to show exact locations. Figures 4 through 9 now indicate whether street parking is proposed.

61-49

This proportion was calculated by dividing the 23-acre site's 900,000 square feet by the Letterman Complex's 1.3 million square feet.

61-50

The Trust would work closely with the selected development team to ensure that TDM and mitigation measure TR-4, *Monitoring of Parking*, strategies are successful (see master response 19). Refer to master response 20 for parking controls.

61-51

Figure 11a has been revised to indicate the p.m. peak-hour roadway segment traffic volumes on Presidio Boulevard, Lombard Street within and outside the Presidio, Lincoln Boulevard, and Richardson Avenue.

61-52

See the response to comment 12-2. Analysis using the higher of the peak-hour traffic conditions is standard procedure in environmental analysis.

61-53

The EIS presents traffic volumes at the key intersections adjacent to and within the Presidio where traffic generated by development at the Letterman Complex would be most concentrated (see Figures D-1 through D-6 in Appendix D). Within the Letterman Complex, traffic would disperse through the internal roadway network, and traffic volumes on these roadways would vary by alternative depending on the roadway network and connections that would be provided, as well as the entrances/exits from the parking facility. The internal roadway network and connections would be refined and modified for the preferred alternative, as appropriate, as part of the design review process.

61-54

The intersections that were analyzed in the EIS were selected because they would be most likely affected by traffic generated by proposed development at the Letterman Complex. The roadways internal to the 23-acre site vary by alternative, and have not been designed to the level required for detailed traffic impact analysis (e.g., number of traffic lanes, turn pockets, intersection control). The design of the roadways and intersections internal to the 23-acre site would be developed with and reviewed by the Presidio Trust as part of the design review process to ensure adequate traffic circulation and acceptable traffic operating conditions.

61-53

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61-55

The land use associated with Letterman Digital Arts (Alternative 5) was considered to be "research and development" and the land use associated with the Internet media anchor tenant (Alternative 4) was considered to be "office use" because the proposed number of employees compared with the proposed square feet of replacement construction is consistent with the employee densities typically noted for those two use groups. The *Trip Generation Manual* (Institute of Transportation Engineers 1991 and 1997) indicates an average employee density of 342 square feet per employee for research and development uses, and between 301 and 313 square feet for various types of office uses. Because Letterman Digital Arts proposes a total of 2,500 employees for the 900,000 square feet of facilities, the average employee density of 360 square feet per employee is more consistent with the lower density typically found for research and development facilities than for office space.

61-56

The comment is inaccurate in its statement about NEPA. Mitigation may be built into an alternative (see response to comment 61-40). In further response to the comment, the text in Sections 4.1.3 through 4.5.3 (Water Supply and Distribution) and the water demand estimates in Tables 12 and 13 have been revised to evaluate the impacts of the alternatives on current water supply without mitigation (e.g., without the use of gray water or recycled storm water). The analysis concluded that only Alternative 2, with the highest water demand of 111,280 gallons per day, would require mitigation. Implementation of water conservation measures in mitigation measure WS-2, *Water Supply- and Demand-Side Solutions to Reduce Cumulative Impacts*, would save approximately 120,000 gpd of water, which would offset the increase in water demand due to development at the Letterman Complex. Regarding whether these measures would result in adverse impacts, see master response 13.

61-57

The air quality effects of adding new signals on Richardson Avenue/Doyle Drive at the Gorgas Avenue and Lyon Street connections would be beneficial, because the improvements would mitigate the p.m. peak-hour operation of the intersection under 2010 conditions from a rating of Level of Service (LOS) F without the improvements to LOS D, or better, depending on the proposed development alternative. The intersection operating conditions are discussed in Section 4.1.7.2, Impacts on Intersection Operating Conditions, and LOS ratings are shown on Table 18 of the EIS. These improvements would not cause a quantifiable effect on region-wide emissions because region-wide average travel speeds would not increase substantially. Localized CO concentrations, however, would be reduced because travel speeds through the intersection would be increased. Because intersection performance would improve, and the air quality effects would be beneficial, no further analysis is necessary.

61-58

Adding new signals on Richardson Avenue/Doyle Drive at the Gorgas Avenue and Lyon Street connections would not be expected to substantially alter the noise environment. The noise-sensitive residences near the existing intersection of Lyon Street and Francisco Street with Richardson Avenue would be most directly affected by these improvements. Existing conditions for this location are shown in Table 8 of the EIS. Average traffic speeds along Richardson Avenue near Francisco Street would increase with the intersection improve-

ments, and noise caused by vehicles accelerating through the intersection in its existing condition would be relocated about 200 feet from Richardson Avenue/Francisco Street to Richardson Avenue and the new Gorgas Avenue entrance. No substantial change in the character or intensity of the traffic noise is expected. Because no other noise-sensitive receptors would be likely to be affected by the intersection improvements, no further analysis is necessary.

61-59

Please refer to master response 7A. Implementation of the Planning Guidelines would have no impacts beyond those analyzed in the Draft EIS. Should any actions identified in the guidelines beyond the 23-acre site require major new development (such as infill construction associated with Alternative 1 or restoration of Tennessee Hollow), site-specific plans would be developed and additional environmental review and compliance with laws related to historic preservation would be conducted. Therefore, no additional analysis is required. As further discussed in Section 1.4.3 of the EIS, the NEPA process was an appropriate occasion to involve the public in the development of guidelines that would provide a framework for all actions in the 60-acre Letterman Complex.

61-60

The Planning Guidelines have not been amended as suggested. The Final EIS is the appropriate location for the description and analysis of the proposed square footage caps for the Letterman Complex, rather than the Planning Guidelines. The Planning Guidelines were prepared to guide the planning and design process for new construction within the Letterman Complex. They are a planning tool only.

61-61

A revised site plan for the preferred alternative has not been incorporated into the Final EIS. It is the Trust's opinion, as documented in the EIS, that the preferred alternative is largely consistent with the Planning Guidelines and those inconsistencies that constitute adverse effects are identified and adequately analyzed in Section 4 of the Final EIS. It should be noted that NEPA does not require the development of planning guidelines; rather, they offer an extra level of analysis and provide the public additional opportunities for involvement in the design process (see Section 1.4 of the Final EIS). For further discussion of the relationship of the Planning Guidelines to the project, please refer to master response 7A.

61-62

As with any mitigation measure presented in a Draft EIS, the Planning Guidelines presented there were in draft form, and the Trust included the draft guidelines with the Draft EIS to give the public opportunity for review and comment. The Planning Guidelines in Appendix B have been corrected and revised in response to public comments received and are now final. The Final Planning Guidelines in Appendix B will be merged into the Design Guidelines, which are now under development and must be submitted to the SHPO for review and comment as part of the NHPA's Section 106 consultation process. The Final Planning Guidelines would therefore be applied and continue to provide direction through the consultation and design review process under the Programmatic Agreement where there would be continuing review of their application by the ACHP, SHPO, NPS, and the public after the environmental review process for this action is concluded. This process

for applying the Planning Guidelines is incorporated into mitigation measure CR-1, which the Trust intends to adopt as part of its Record of Decision on this Final EIS.

61-63

Visual simulations of the various alternatives are not included in the Final EIS, as they are not required under NEPA. The use of appropriate graphics, while sometimes helpful, is not mandatory (CEQ NEPA Regulations Section 1502.8). In response to the comment, graphics to provide views of the 23-acre site (see Figure 13) and illustrate the visual impacts for each alternative have been added to the Final EIS (Figures 20 through 24), as well as more detailed analysis to address the concerns raised. The Planning Guidelines offer an extra level of analysis and offer the public additional opportunities for involvement in the design process. The Trust does not believe that the type of graphics described by the commentor is necessary within the guidelines. In addition, please refer to master response 24.

61-64

The title page of the Final EIS has been revised in response to this comment.

61-65

In response to this comment, the inside back page of the Final EIS provides additional information on the Presidio Trust.

61-66

Comment noted. References to and comparisons with other alternatives in the discussion under Section 4.1 have been omitted in the Final EIS. However, where the impacts of Alternatives 2 through 6 would be similar to Alternative 1 and do not raise additional issues (for example, cumulative impacts of Alternative 5 on schools as discussed in Section 4.5.11), the cross-references are still included in the Final EIS because they provide meaningful comparisons.

61-67

In response to the comment, building B has been deleted from the proposal. Please refer to Figure 5 in the Final EIS.

61-68

Additional text has been added to Section 4.2.8.1 to discuss any possible adverse effects of this alternative on building massing and scale, the O'Reilly Greensward, and site circulation. Also, Section 4.2.8.6 has been added to the Final EIS to discuss visual impacts of this alternative, including impacts on views and historic view corridors (also, please refer to Figure 21, Visual Impacts of Alternative 2 in the Final EIS).

- *O'Reilly Buffer* – Please refer to master response 23.
- *Gorgas/Lyon Connection* – Please refer to master response 22.
- *Views from East are Blocked* – Additional analysis of visual impacts, including views, has been added, as shown in Figure 21.
- *Gorgas Edge is Amorphous* – Please refer to master response 23. Also note that Figure B-18 in the Planning Guidelines has been changed to clarify the extent that a strong built edge is desired.

- *Design has Awkward Circulation at Gorgas Entries* – Please see master response 22.
- *Minimal Connections to Historic Clusters* – Additional text has been added to Chapter 4, Environmental Consequences to analyze connectivity and site circulation. Improving weak connections would be a subject of future design development and review.

61-69

Comment noted. No further response is necessary.

61-70

Additional text has been added to Section 4.3.8.1 to discuss any possible adverse effects of this alternative on building massing and scale, the O'Reilly Greensward, and site circulation. Also, Section 4.3.8.6 has been added to discuss visual impacts of this alternative which analyzes impacts on views and historic view corridors, as does the new Figure 22.

- *No O'Reilly Buffer* – Please refer to master response 23.
- *Scale of Buildings at O'Reilly too Large* – Please refer to master response 23.
- *Awkward Connection at Lombard/Lyon and O'Reilly/Gorgas* – Please refer to master response 22.
- *Poor Termination of Thornburg; No Connection between New and Historic Structures* – The Trust disagrees regarding termination at Thornburg Road. The historic view corridor would be preserved and additional circulation routes would be added. Refer to Figure 22, which has been added to the Final EIS.
- *Gorgas Edge is Amorphous* – Please refer to master response 23. Also note that Figure B-18 in the Planning Guidelines has been changed to clarify the extent that a strong built edge is desired.
- *Minimal Connection to Historic Clusters* – Additional text has been added to Section 4, Environmental Consequences, to analyze connectivity and site circulation. Improving weak connections would be a subject of future design development and review.

61-71

Additional text has been added to Section 4.4.8.1 to discuss any possible adverse effects of this alternative on building massing and scale, the O'Reilly Greensward, and site circulation. Also, Section 4.4.8.6 has been added to discuss visual impacts of this alternative, including impacts on views and historic view corridors (in addition, please refer to the new Figure 23).

- *Awkward Circulation/Connection at Lombard/Letterman and O'Reilly/Gorgas* – Please refer to master response 22.
- *Poor Termination of Thornburg; No Connection between New and Historic Structures* – Please refer to master response 22.
- *Formal Entry does not Appear Formal, not Clearly Main Entry* – The area in question is characterized by an open space adjacent to Letterman Drive defined by two parallel roads separated by a lawn which lead into the center of the complex. Adjacent buildings define two edges of this green space. At the conceptual level of this site plan, its degree of "formality" is highly subjective, but the Trust continues to feel comfortable in describing this as the main entry to the project.

- *Scale of Office Buildings too Large* – Please refer to master response 23.
- *North/South Connections are Awkward* – Please refer to master response 22.
- *Minimal Connection to Historic Clusters* – Additional text has been added to Section 4, Environmental Consequences, to analyze connectivity and site circulation. Improving weak connections would be a subject of future design development and review.

61-72

With regard to the comment about scale of new construction, please refer to the Final EIS, Section 4.5.8.1.

61-73

Additional text has been added to Section 4.5.8.1 to discuss any possible adverse effects of this alternative on building massing and scale, the O'Reilly Greensward, and site circulation. Also, Section 4.5.8.6 has been added to discuss visual impacts of this alternative, including impacts on views and historic view corridors (in addition, please refer to the new Figure 24.)

- *No O'Reilly Buffer* – Please refer to master response 23.
- *O'Reilly Edge and Views* – Please refer to master response 23.
- *Awkward Circulation/Connection at O'Reilly/Gorgas* – Please refer to master response 22.
- *Character of Great Lawn* – Please refer to responses to comments 25-4 and 33-2.
- *Gorgas Edge is Amorphous* – Please refer to master response 23. Also note that Figure B-18 in the Planning Guidelines has been changed to clarify the extent that a strong built edge is desired.
- *Public Zone* – Please refer to the response to comment 44-31.
- *Minimal Connection to Historic Clusters* – Additional text has been added to Section 4, Environmental Consequences, to analyze connectivity and site circulation. Improving weak connections would be a subject of future design development and review.
- *Information about Building Heights* – This information is contained in the description of the alternative. Topographic depiction would occur at a later stage in the planning and design development phases. That level of detailed information is beneath the required information for purposes of this NEPA analysis.
- *Simulations* – Please refer to master response 24.
- *Density* – Please refer to response to comments 4-1 and Final EIS Section 4.5.8.1.
- *Demolition/Construction* – The information is contained within the Final EIS in Section 2, Alternatives. With regard to specific concerns about Tennessee Hollow, please refer to responses to comments within letter 48.

61-75

Text has been added to Section 3, Affected Environment, and elsewhere, to include the total number of existing buildings.

61-76

These roads have been added to Figure 10, Existing Conditions.

61-77

This level of design detail is not required as part of NEPA but would be incorporated into the future planning and design review process to aid in assessing the consistency with the Planning Guidelines.

61-78

The maps have been modified to depict buildings 1029 and 1030, as well as other buildings not slated for demolition, with a solid line. Figure 4 has been corrected to delete those buildings which have already been demolished.

61-79

The recommended text change has been incorporated into the Final EIS.

Letter 62

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

PRESIDIO TRUST REC'D

John Pelka, NEPA Compliance Coordinator
Presidio Trust
34 Graham St., P.O. Box 29052
San Francisco, CA 94129-0052

Dear Mr. Pelka:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Supplemental Environmental Impact Statement (DEIS) for the **Letterman Complex**. Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The Letterman Complex DEIS analyzes six alternatives for development and occupancy of a 23 acre site in the Presidio of San Francisco. In a notice dated June 18, 1999, the Presidio Trust identified Alternative 5, Digital Arts Center, as its preferred alternative. The Digital Arts Center alternative proposes to demolish the Letterman Army Medical Center and Letterman Army Institute of Research buildings, construct new buildings containing approximately 90,000 square feet of space, establish a digital arts archive and training institute, and devote a portion of the site to a landscaped open space with a water feature. 62-1

EPA has assigned a rating of **EC-2** (Environmental Concerns--Insufficient Information) to the Letterman Complex DEIS. This rating reflects our independent analysis of potential project impacts and the adequacy of the NEPA documentation prepared for the project, with a particular focus on the preferred alternative identified by the Presidio Trust. Please see the enclosed document entitled "Summary of EPA Rating Definitions" for a complete description of our rating categories.

EPA's principal concerns involve the traffic and parking aspects of the preferred alternative. We believe that the Presidio Trust should take all feasible steps to reduce the number of project-related single occupancy vehicle (SOV) trips to, from, and within the Presidio, and should adjust the capacity of the proposed parking structure accordingly. We are encouraged that the DEIS and the Transportation Technical Report include a Travel Demand Management (TDM) strategy, and recommend that the Record of Decision clearly state that continuing occupancy of the project site is dependent upon full participation in the TDM program. 62-2

EPA has also noted that the DEIS contains limited information regarding the Presidio Trust's long term development plans for the Presidio. Since the Presidio Trust intends to prepare separate NEPA documents for individual development actions, rather than a master development plan, we believe it would be appropriate for the Presidio Trust to give the public an opportunity 62-3

to comment on the overall development strategy in the context of cumulative environmental impacts. EPA was able to locate relevant information on this topic on the Presidio Trust's website, in a document entitled "The Presidio Trust Financial Management Program, Report to Congress" dated July 8, 1998, and we request that this document be included in the FEIS as an appendix. 62-3

EPA appreciates the opportunity to review this DEIS. If you have any questions about this letter, please contact Leonidas Payne of my staff at (415) 744-1571.

Sincerely,

David Farrel, Chief
Federal Activities Office

Atch: Summary of EPA Rating Definitions
Specific comments

SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

ADEQUACY OF THE IMPACT STATEMENT

Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

Specific Comments

1) Section 3.9.5 of the DEIS states that 1,465 off street and 88 on street parking spaces are available within the 60 acre Letterman Complex, but does not provide a specific figure for the 23 acre project site. This information should be provided in the FEIS. 62-4

2) The Presidio Trust should work to ensure that intersection and gate modifications do not pose a safety problem for bicyclists and pedestrians, through the elimination of sidewalk width, reduced signal times, or the necessity to wait through two traffic cycles to cross streets. 62-5

3) The Transportation Technical Report includes a table (Table 2.2 at Page 2-4) outlining the proposed TDM strategy components for Alternatives 2-5. We recommend that this table be updated to include Alternatives 1 and 6, and included in the FEIS. For the preferred alternative, we recommend that the FEIS include a brief summary of the overall TDM strategy concept for the alternative, and a more detailed explanation of the reasons for including or excluding specific TDM elements. To the degree that additional TDM elements might be instituted at a later time, we recommend that the FEIS discuss how, when, and under what circumstances additional TDM requirements would be imposed. 62-6

4) Section 4.5.7.3 states that "parking demand of 1260 spaces would be substantially less than the proposed supply of 1530 spaces, resulting in a surplus of 270 spaces" and that "[a] surplus in parking spaces could compromise the TDM strategies designed to encourage non-automobile modes, and could potentially result in an increase in vehicle trips to the site." To prevent these impacts, we recommend that the size of the proposed parking garage be adjusted accordingly. 62-7

5) The Presidio Trust should estimate the maximum number of SOV daily trips which could be eliminated with full implementation of all available TDM elements, and include this information in the FEIS. This evaluation should take place before the Presidio Trust makes a final decision on the capacity of the proposed parking garage. 62-8

6) EPA is particularly concerned about the expected number of vehicle trips within the Presidio, as outlined in Table 14. The Presidio Shuttle Bus System should be designed to accommodate these internal trips, rather than the proposed underground parking structure. 62-9

Responses to Comments in Letter 62

62-1

Thank you for your review. During scoping and the preparation stages of the Draft and Final EIS, the Presidio Trust requested the participation of the EPA. At the EPA's request, the Presidio Trust developed information to be included in the EIS, met with the agency, and extended the public comment period after consultation with the EPA. The Presidio Trust will continue to fully cooperate with the EPA during the remainder of the NEPA process for the Letterman Complex and take all feasible steps to reduce the environmental impact of the project.

62-2

Refer to master responses 19 and 20.

62-3

The cumulative impacts of currently foreseen development in the Presidio are described in Sections 4.1.11 through 4.6.11, Cumulative Impacts within the Final EIS. Please refer to master response 4A. In response to the comment, the FMP is included as Appendix E to the Final EIS.

62-4

The text of the Final EIS has been revised to indicate that there are currently 578 off-street parking spaces and 11 on-street parking spaces within the 23-acre site, which is 38 percent of the total parking supply in the 60-acre Letterman Complex.

62-5

The proposed traffic modifications do not include narrowing of sidewalks or reduced signal time for pedestrians.

62-6

In response to the comment, Table D-12 in Appendix D of the Final EIS has been revised to include summaries of the TDM strategies for Alternatives 1 and 6. In addition, please refer to master response 19.

62-7

See master response 20.

62-8

Refer to master response 19.

62-9

Comment noted. The Presidio Trust has set a maximum of 50 percent automobile use for internal trips, but believes that this can be improved through the internal bus shuttle and other TDM measures such as paid parking and improved bicycle routes and parking. The primary function of the shuttle bus system is to decrease dependency on the automobile for home/work trips for employees who live in the Presidio.

Letter 63

AMERICAN ASSOCIATION FOR THE ADVANCEMENT OF SCIENCE

Directorate for Education and Human Resources Programs

1200 New York Avenue, N.W
Washington, DC 20005-3920
Tel: 202 326 6670
Fax: 202 371 9849

August 4, 1999

NEPA Compliance Coordinator
Attention: Letterman Complex
Presidio Trust
34 Graham Street
San Francisco, California 94129-0052

Dear Coordinator:

I am writing to speak to the requirements for development of the Letterman Digital Center in the Presidio National Park that call for enhancement of the cultural and educational resources of the Presidio. In particular I wish to speak to the role of the George Lucas Educational Foundation (GLEF), that will be housed within the Center. We have been pleased to be associated with the work of the Foundation as it represents cutting edge efforts to improve the quality of education by pointing the way toward real reform and developing a large, involved public constituency focused on helping the nation's schools. To me GLEF demonstrates Lucas companies' commitment to education.

This non – profit Foundation has created and distributed more than 27,000 copies of Learn and Live, a video and resource book that show what is possible in education when students are challenged and when new technologies are incorporated into their education. 63-1

The film was created to help policymakers, parents, educators, business leaders and the general public imagine how schools look when technology and other innovative strategies are employed in teaching and learning. The resource book was developed to guide those who wish to adapt and adopt such strategies to those people and places where ideas and advice are available.

There have been many different groups that have used the materials. We have been fortunate to be able to include presenters from GLEF at the AAAS Forum for School Science. Copies of Learn and Live are being shared with teacher leaders in the District of Columbia Public Schools and will help form the basis of local discussions on school reform. We are but one community where this resource is being made available.

Page 2
August 4, 1999

The stories in Learn and Live help us see a future for our schools that we are then inspired to create. The work of the George Lucas Educational Foundation is a reflection of the values and commitment of George Lucas to quality education for all children. I am excited about the plans for GLEF in the Presidio for it will position the Foundation to work with partner organizations in promoting a vision for school change. 63-1

Sincerely,

Shirley M. Malcom

Shirley M. Malcom, Head
Directorate for Education
and Human Resources

SMM/jw

Response to Comment in Letter 63

63-1

Thank you for your correspondence. The organization's support of the Letterman Digital Center is noted for the record.

Letter 64

CALIFORNIA DEPARTMENT OF EDUCATION
721 Capitol Mall
Sacramento
CA 95814
Phone: (916) 657-4766
Fax: (916) 657-4975

DELAINE EASTIN
State Superintendent of Public Instruction

August 5, 1999

NEPA Compliance Coordinator
Presidio Trust
34 Graham Street
San Francisco, CA 94129-0052

Attn: Letterman Complex

Dear Coordinator:

The Letterman Digital Center, approved for development in the Presidio National Park, fulfills the goals set forth in the General Management plan to enhance the cultural and educational resources of the Presidio. The George Lucas Education Foundation, one of the tenants of the Letterman Digital Center, demonstrates the Lucas companies' commitment to excellence in education. The non-profit Foundation gathers and distributes information designed to improve public education and to involve the general public in helping the nation's schools.

To this end, the Foundation has created and distributed more than 27,000 copies of *Live and Learn*, a video and 300-page resource book, which promotes the kind of learning where all students are challenged and engaged, have access to interactive technologies, and are prepared to live and work in a rapidly changing, highly technological world. 64-1

The Foundation produced *Learn & Live* to show parents, educators, policy makers, and the general public how technology and other innovations are being used to help create dynamic, effective public schools. The *Learn & Live* film and book are being used around the country by many different groups--in colleges of education with new teachers, by business leaders who are creating partnerships with schools, by school districts for inservice training, and by citizen groups to envision possibilities for the future. The stories and programs profiled in *Learn & Live* portray what education can be like when students, teachers, parents, businesses and communities focus on the educational issues at hand.

The work of The George Lucas Educational Foundation portrays George Lucas' commitment to quality public education. I know the Presidio National Park will be the perfect venue for them to continue their important work.

Sincerely,

Sonia Hernandez

Sonia Hernandez, Deputy Superintendent
Curriculum and Instructional Leadership

Take a step in the right direction. Support public schools by approving the George Lucas proposal. The nation's children will be the beneficiaries if this is done.

Response to Comment in Letter 64

64-1

Thank you for your correspondence. The agency's support of the Letterman Digital Center is noted for the record.

Letter 65

Golden Gate National Recreation Area and Point Reyes National Seashore

A D V I S O R Y C O M M I S S I O N

August 17, 1999

TO: Honorable Members of the Board
The Presidio Trust
San Francisco, California

REGARDING THE LETTERMAN DRAFT ENVIRONMENTAL IMPACT STATEMENT

At your request, and pursuant our statutory authority, this Commission held public hearings on June 15 and July 21, 1999 in San Francisco on your Draft Environmental Impact Statement (DEIS) for development of the Letterman complex. The public hearings have ended, and the public comment period is closed. Forwarded to you is the record of public comment as received by us, both at our hearings, and in written form. In addition, we submit the following comments for your consideration:

1. We choose in this letter to comment only on the EIS, and not to comment on the Trust's choice of a preferred alternative. 65-1

2. We encourage you to observe your commitment to follow the General Management Plan for the Presidio as your foundation planning document. We note your approach to do a Supplemental Environmental Impact Statement for instances in which the General Management Plan cannot be followed because of changed circumstances. 65-2

3. We are concerned that the General Management Plan Amendment for the Presidio is a broad, Presidio-wide planning document, and that the Environmental Impact Statement on it is relevant only when viewed in the context of the Presidio-wide plan it analyzed; as Presidio-wide planning assumptions get set aside, the GMPA EIS is no longer applicable, and we wonder if you can tier a subsequent EIS from it. 65-3

4. We agree with public comments that it seems to be time to update the General Management Plan for the Presidio. 65-4

5. We recommend your proposed Comprehensive Management Program be completed promptly, and be subject to public review. 65-5

6. In our view, your acceptance of a proposal for one site prior to completion of a comprehensive plan for the rest of the Presidio runs the risk of limiting options for uses elsewhere in the Presidio. As examples, a conference center in one place probably negates a conference center elsewhere; likewise, the absence of housing in one proposal increases the pressure for housing in future projects. The National Historic Preservation Act calls for comprehensive planning, and requires analysis of the cumulative effects of development projects on the National Historical Landmark as a whole. 65-6

Building 201, Fort Mason, San Francisco, CA 94123

Richard Bartke, *Chair* Amy Meyer, *Vice Chair* Michael Alexander Howard Cogswell, Ph.D. Jerry Friedman Naomi Gray
Redmond Kernan Melvin B. Lane Yvonne Lee Trent Orr Lennie Roberts Merritt Robinson R.H. "Hank" Sciaroni John J. Spring
Edgar Wayburn, M.D. Carlota del Portillo Jacqueline Young

7. The design review process for your preferred alternative should be accomplished in the context of a specific implementation plan for the entire 60-acre Letterman site, not just the 23 acres in the Letterman offering. Design review should recognize the visual impression that new construction will have for visitors who are arriving in a national park. 65-7

8. Traffic remains a major concern to the park's constituents. Please continue to work with the National Park Service, city, state and neighborhoods, to mitigate the impacts of traffic on the park, and its neighbors. 65-8

9. We deem it a requirement that your tenants have an active and prominent public-serving component. In our view, this should be an adjunct to and done in cooperation with the museums of natural and cultural history on the Presidio. It should also include liberal opportunities for the public to visit and enjoy the amenities provided and to gain an understanding of the activities the tenants are engaged in and how they fit the mission of the Presidio as part of a national park. These components should be so situated that they are not only easily accessible by park visitors, but are within the natural circulation pattern, and attractive to visitors who may be unfamiliar with the Presidio. Likewise, the open space provided to your tenants should be so designed and sited that it will naturally attract our visitors. We urge that in your negotiations with potential tenants that all of the above be prime goals. 65-9

10. We suggest that before a lease is executed, that the lease or a summary of deal points, schematic designs, mitigation measures, and benefits to the park and the public, be presented for public dialogue at a public Trust workshop, or in an alternative public forum. 65-10

On behalf of the Commission,

Richard Bartke
Chairman
Golden Gate National Recreation Area
Citizens Advisory Commission

RHB;fs
ggnra\presidio.01

Responses to Comments in Letter 65

65-1

The Presidio Trust would like to thank the Advisory Commission for their comments on the EIS, and for holding public hearings on behalf of the Presidio Trust for new development at the Letterman Complex.

65-2

The comment is noted for the record. For further response on the Trust's compliance with the GMPA, refer to master response 2A.

65-3

Please refer to master response 1D.

65-4

See master responses 2B and 4A.

65-5

The comment is noted for the record. For further response concerning the need to complete the comprehensive management program, refer to master response 4A.

65-6

Please refer to Sections 1.1 and 1.2 of the Final EIS. For response to comment concerning the need for a comprehensive plan to adequately address cumulative effects under the NHPA, refer to master response 4A.

65-7

The Planning and Design Guidelines are the design framework for the entire 60-acre complex, with guidance for replacement construction within the 23-acre site. Please refer to master response 7B. The design review process will include an opportunity for public comment on the refined design and input about the visual impression that the new construction would have for visitors arriving at the Presidio. See also Section 1.4 of the Final EIS.

65-8

Comment noted. The Presidio Trust will continue to work with the cited agencies and others to mitigate traffic impacts.

65-9

Comment noted. Additional text has been added to the descriptions of the alternatives to better explain the proposed tenants' activities and programs, and community and support services. In addition to the programs and activities brought forward by tenants, the NPS, in cooperation with the Presidio Trust, is responsible for carrying out interpretive services for the Presidio and would be engaged in developing programs for the Letterman Complex. Text has also been added to the Final EIS to address the topic of visitor experience at the Letterman Complex (see master response 25). It is the Trust's intention that visitors be welcome within public areas and open spaces throughout the Letterman Complex and that circulation patterns be developed to allow visitors easy access into these areas.

65-10

Comment noted. Please see master response 7B with regard to the design review process and additional public involvement. The Presidio Trust will provide the public a project summary, information about mitigation measures, and benefits to the park and public as the project progresses.

Letter 66

STATE OF CALIFORNIA – THE RESOURCES AGENCY

GRAY DAVIS, *Governor*

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION
P.O. BOX 942896
SACRAMENTO, CA 94296-0001
(916) 653-6624 Fax: (916) 653-9824
calshpo@ohp.parks.ca.gov

September 27, 1999

Ms. Cherilyn Widell
Compliance and Permitting Manager
The Presidio Trust
34 Graham Street, P.O. Box 29052
SAN FRANCISCO CA 94129-0052

Re: DEIS and Planning Guidelines For The Letterman Complex

Dear ~~Ms. Widell~~: Cherilyn

Thank you for providing me with the opportunity to review and comment on the subject document.

To date, my comments on new development and uses within the Letterman Complex have been provided to the Presidio Trust as part of the ongoing Section 106 process for the undertaking. I intend to comment on the undertaking pursuant to the Section 106 process only. I will therefore not be commenting on the NEPA documents that the Trust has prepared. 66-1

I look forward to reviewing the next draft of the agreement document for the undertaking and to successful conclusion of our Section 106 consultation.

If you have any questions, please call Hans Kreutzberg, Chief of Project Review, at (9160 ^530-9107/e-mail hkreu@ohp.parks.ca.gov.

Sincerely,

Daniel Abeyta, Acting
State Historic Preservation Officer

Response to Comment in Letter 66

66-1

Thank you for your letter. The commentor's reference to Section 106 alludes to Section 106 of the National Historic Preservation Act. Under that legislative provision, federal agencies are required "to take into account the effect" of a project such as new development and uses within the Letterman Complex and to provide the Advisory Council on Historic Preservation (ACHP) a "reasonable opportunity to comment with regard to" such a project. The Council has issued regulations appearing at 36 FR Part 800 that detail how an agency such as the Presidio Trust may comply with the mandate of Section 106. Pursuant to these regulations, the Presidio Trust has been engaged in extensive consultation with the commentor's agency, the California State Historic Preservation Office and the ACHP regarding Section 106 compliance at the entire 60-acre Letterman Complex. The Presidio Trust has also received input and comment from a variety of other organizations. The result of this process has been the production of a Programmatic Agreement (as provided in Appendix F of the Final EIS) under Section 800.14 of the ACHP's regulations. The Programmatic Agreement envisions a sustained involvement of the State Historic Preservation Officer, the ACHP, and the NPS throughout the process of developing design guidelines, conceptual design documents, and schematic design documents. Also provided for in the Programmatic Agreement are significant roles for these entities in the construction monitoring and change order process. The Programmatic Agreement additionally contains, among other things, opportunity for public input; methodologies for addressing archeological properties, discoveries and unforeseen effects; and a requirement of mandatory notification to the Secretary of Interior and invitation for him to participate in consultation where there may be an adverse effect on historic properties. Implementation of the Programmatic Agreement will satisfy the Presidio Trust's Section 106 obligations.

Created by Congress in 1996, the Presidio Trust is charged with preserving the Presidio's natural, historic and scenic resources while making the park financially self-sufficient by 2013. Six Presidential appointees and the Secretary of the Interior or his designee sit on the Board of Directors and oversee management of 80 percent of the Presidio lands.

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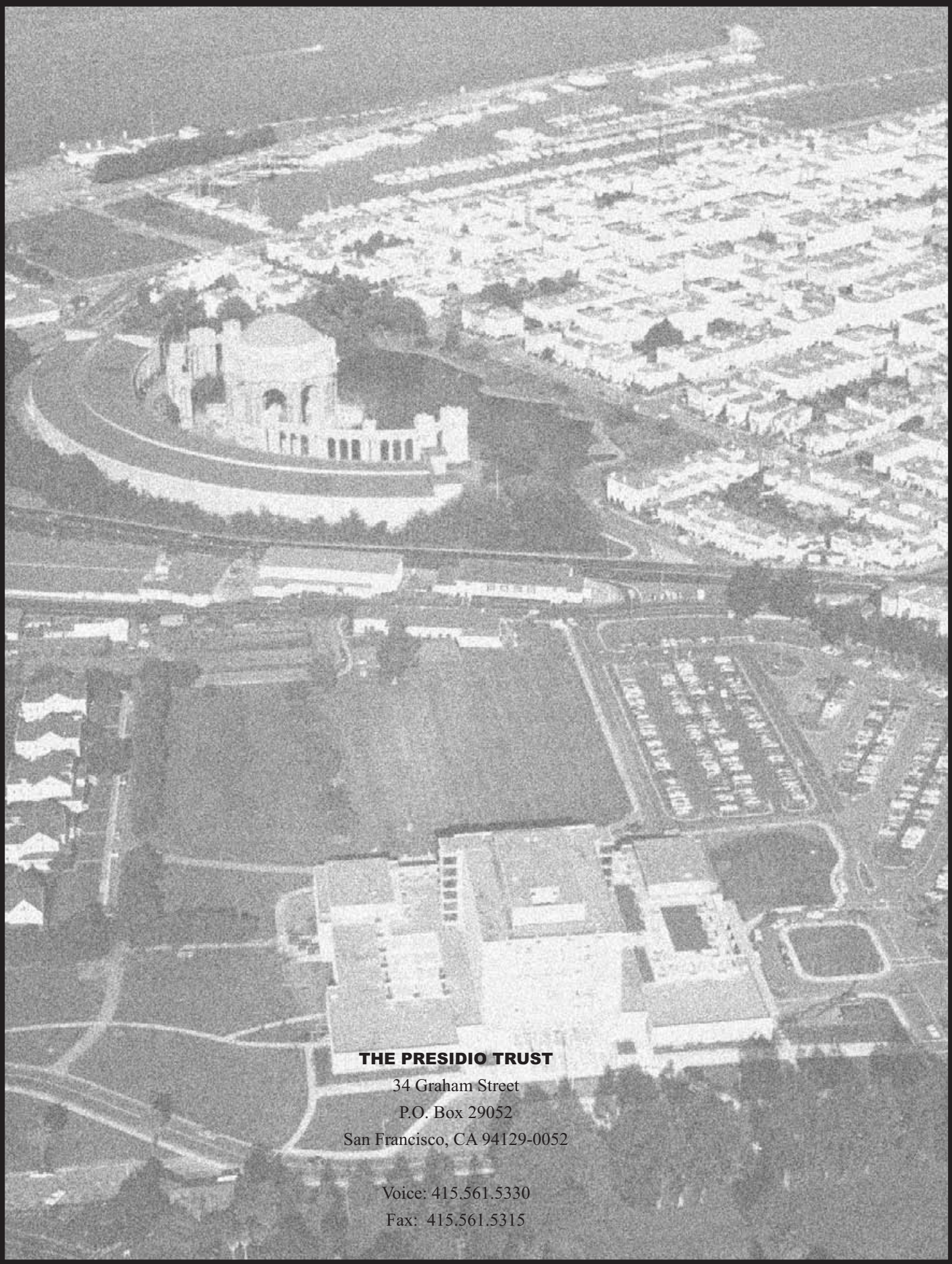

THE PRESIDIO TRUST
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

Voice: 415.561.5330
Fax: 415.561.5315