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Presidio Trust Management Plan
Main Post Update

Response to Comments

THE PRESIDIO TRUST
NOVEMBER 2010

“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.”

FROM THE PRESIDIO TRUST ACT (P.L.104-333)

Presidio Trust Management Plan
Main Post Update
Response to Comments
The Presidio of San Francisco, CA

This document includes summaries of all substantive written and oral comments received following the release of the draft supplemental environmental impact statement (SEIS) and supplement to the draft SEIS (supplement) for the Main Post Update to the Presidio Trust Management Plan, and responses to the comments. This document, together with new analysis, information, and changes made in response to comments, will be filed as the final SEIS.

Comments on Draft SEIS and Supplement

Notices of the availability of the draft SEIS and supplement were published in the Federal Register, and provided on the Presidio Trust's web site and through direct mailings. The draft SEIS and supplement were made available for public review and comment on June 13, 2008 and March 6, 2009, respectively. The notice for the draft SEIS initially announced a public comment period ending July 31, 2008, but this was extended until the end of the comment period for the supplement (June 1, 2009) to allow receipt of more in-depth comments that promoted a better-informed decision. The public was invited to provide oral comment on the draft SEIS and supplement at three Presidio Trust Board of Directors meetings on July 14, 2008, December 9, 2008, and April 7, 2009 and two other public meetings on April 1, 2009 and April 22, 2009. By the close of or shortly after the comment period, the Trust received comments from 6 public agencies, 2 elected officials, 51 organizations, and 2,845 individuals.

Responses to Comments on Draft SEIS and Supplement

The Trust has responded to all substantive public comments according to the requirements of 40 CFR 1503. Responses provide explanations and clarifications related to the content of the draft SEIS and supplement. Where changes to the document have been made in response to comments, these changes are identified. Questions posed by commentors are either answered or acknowledged as outstanding issues. References to the draft SEIS, supplement, technical analyses, and other source materials are included as appropriate.

Wait Period and Public Meeting

The Trust will circulate the final SEIS for at least 30 days before making a decision on the final action. Although there is no requirement for the Presidio Trust to respond to comments received on the final SEIS, all comments received during the 30-day wait period will be considered before the Trust reaches a final decision in a Record of Decision (ROD).

For More Information Contact

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Presidio Trust Management Plan
Main Post Update

Response to Comments

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Introduction

This document includes summaries of all substantive written and oral comments received following the release of the draft Supplemental Environmental Impact Statement (SEIS) for the Presidio Trust Management Plan Main Post Update (Main Post Update) in June 2008 and the supplement to the draft SEIS for the Main Post Update in February 2009, and responses to the comments according to the requirements of the National Environmental Policy Act (NEPA).¹ This document, together with new analysis, information, and changes made in response to comments to the draft SEIS and supplement, will be filed as the final SEIS. The final SEIS is a supplement to and tiers² from the 2002 final EIS for the Presidio Trust Management Plan (PTMP), the Presidio Trust's comprehensive land use plan and policy framework for Area B of the Presidio of San Francisco (Presidio). The final SEIS identifies alternatives to the planning concept for the 120-acre Main Post district at

¹ See 40 CFR 1503 (response to comments).

² See 40 CFR 1502.20 and 40 CFR 1508.28 (tiering). Tiering is defined as the coverage of general matters in broader EISs, with subsequent narrower tiered statements or environmental analyses, incorporating, by reference, general discussions and concentrating solely on the issues specific to the statement subsequently prepared. The CEQ NEPA Regulations encourage the use of tiered documents to "eliminate repetitive discussions of the same issues" and to "focus on the issues which are ripe for decision and exclude from consideration issues already decided or not yet ripe." The final PTMP EIS can be viewed at the Presidio Trust Library or on the Trust's website at <http://www.presidio.gov/Trust/Documents/EnvironmentalPlans/>.

the Presidio identified in the PTMP. The final SEIS also evaluates a number of actions the Trust wishes to pursue in order to realize the PTMP vision of the Main Post as the "heart of the park," and identifies the mitigated preferred alternative, which is further described in the Main Post Update.

INVITING COMMENTS ON THE MAIN POST UPDATE DRAFT SEIS

The Trust released the draft SEIS for public comment on June 8, 2008. Notice of the availability of the draft SEIS was provided by the U.S. Environmental Protection Agency (EPA) on June 13, 2008 (73 FR 33814). The EPA's notice of availability identified the 45-day time period for public review of the draft SEIS to end July 31, 2008. In response to requests from interested parties, the Trust extended the prescribed comment period by 50 days to September 19, 2008 (73 FR 45092), again by 31 days to October 20, 2008 (73 FR 53295), again by 27 days to November 17, 2008 (73 FR 60368), and again by 28 days to December 15, 2008 (73 FR 67898). By extending the comment period, the Trust anticipated more in-depth comments on the draft SEIS to promote a better-informed decision on the proposed action. More than 300 copies of the draft SEIS were distributed to commenting agencies and the public. The draft SEIS was also made available for review at the Trust headquarters, at local libraries, and on the Trust's web site.

The public was invited to provide oral comment on the draft SEIS at Trust Board of Directors meetings on July 14, 2008, where

approximately 700 individuals attended and at which 125 spoke, and on December 9, 2008, where approximately 200 individuals attended and at which 67 spoke.³ In addition, the Trust conducted approximately 23 guided walks during the summer of 2008 (June 15 to August 27) to provide information, answer questions, and accept public “comment cards” on the draft SEIS and the various proposals being considered. These walks and tours were attended by over 1,500 people. The Trust also hosted five workshops: one on July 28, 2008 attended by approximately 100 people to discuss the transportation and parking analysis section of the draft SEIS; three during the fall of 2008 (September 25, September 28, and October 2⁴) attended by approximately 125 people to provide additional opportunities to discuss the draft SEIS and the alternative concepts for the Main Post; and one on November 19, 2008 attended by approximately 120 people to update the public about the compliance process, familiarize them with the applicable standards for building in a historic site, and introduce most recent strategies that had been developed. Additionally, the Trust participated in numerous meetings with neighborhood groups, resource conservation organizations, professional and civic associations, and various commissions of the City and County of San Francisco, including the Planning Commission and Landmarks Preservation Advisory Board.

³ *Transcripts of the July 14, 2008 and December 9, 2008 public meetings can be viewed at the Presidio Trust Library and on the Trust’s web site, and constitute part of the formal public record.*

⁴ *Transcripts and a summary of the September 25, September 28, and October 2, 2008 Main Post workshop series can be viewed at the Presidio Trust Library and on the Trust’s web site.*

By the time the supplement to the draft SEIS was circulated in February 2009, the Trust had received comments from 5 public agencies, 1 elected official, 51 organizations, and 2,343 individuals, including form letters.⁵ In general, many of the commentors expressed a strong desire to enhance and maintain the historic character of the Main Post, and ensure that the Main Post is preserved as a place of natural beauty and as an oasis in the city for future users. The same commentors noted how unique the Main Post is and the importance of maintaining its strong sense of place. Many commented that the Main Post should have a high level of public accessibility, particularly in the Montgomery Street Barracks, and that the plan to reveal El Presidio would be an important asset. While most commentors were against the now-withdrawn museum of contemporary art (CAMP) proposal⁶ on the Main Post, many were open to the museum being located elsewhere on the Presidio. In addition, though commentors were concerned about new construction, they were also open to the addition of new buildings as long as they were consistent with the character of the Main Post. The provision of lodging on the Main Post was seen as appropriate, particularly in regards to reuse of Pershing Hall. However, there was some skepticism regarding the need for new construction of a freestanding lodge along the eastern edge of the Main Parade. Finally, most supported expanding the Presidio Theatre, converting a portion of Building 50 into a Heritage Center, and

⁵ *Comment letters are available for review at the Presidio Trust Library and constitute part of the formal public record.*

⁶ *The CAMP is no longer being evaluated because in 2009 the proponent abandoned their effort to build the contemporary art museum at the Main Post.*

developing a state-of-the-art Archaeology Center in the buildings and garages adjacent to Building 50.

INVITING COMMENTS ON THE SUPPLEMENT TO THE MAIN POST UPDATE DRAFT SEIS

The Trust announced in a December 8, 2008 press release and a December 12, 2008 Federal Register notice (73 FR 75777) that, as the result of the Trust's analysis of the alternatives in the draft SEIS and the analysis developed in the course of consultation under Section 106 of the National Historic Preservation Act (NHPA), and in consideration of public comment, it had identified a preferred alternative and would analyze the alternative in a supplement to the draft SEIS. In the announcements, the Trust indicated that it elected to address the preferred alternative in a supplement to the draft SEIS to best integrate and satisfy its NEPA and NHPA requirements. The announcements also informed the public that the Trust would continue to accept public comments on the draft SEIS until the deadline for comments on the supplement. The Trust Board of Directors held a public meeting on December 9, 2008 to explain the preferred alternative and accept public comment. Approximately 250 people attended the meeting and 68 offered comments.

The Trust made the supplement to the draft SEIS available to the public at the beginning of the last week of February 2009. The EPA published notice that the supplement was filed by the Trust and received on March 6, 2009 (74 FR 9817-9818). The EPA's notice of availability identified the 45-day time period for public comment to end April 20, 2009, which the Trust extended by 7 days to April 27, 2009 at the request of the public (74 FR 15265), and again by 35 days to June 1, 2009 (74 FR

18706). More than 300 copies of the supplement were transmitted to commenting agencies and individuals. The supplement was also made available for review at the Trust headquarters, at local libraries, and on the Trust's web site.

The Trust initially decided to hold three public meetings during the comment period for the supplement to provide opportunities for the public to provide oral comment. However, in response to public requests, the format of the third public meeting was changed to a planning workshop that provided an overview of the transportation issues being analyzed through the Main Post planning and environmental review process. Trust and City and County of San Francisco staff were also on hand to answer questions about transportation issues. The first public meeting on April 1, 2009 was attended by approximately 40 people and 19 spoke. The second meeting, held by the Trust Public Board of Directors on April 7, 2009, was attended by approximately 375 people and 84 spoke. The transportation workshop on April 22, 2009 was attended by approximately 125 people and 23 spoke.⁷

From March 6, 2009 through April 18, 2009, the Trust maintained a drop-in (10:00 AM to noon Fridays and Saturdays) Main Post Information Center in Building 105 for the public to learn more about the preferred alternative and the planning and environmental review process. Illustrations and other information about proposals in the alternative were

⁷ *Transcripts of the April 1, 2009 and April 7, 2009 public meetings and the April 22, 2009 workshop can be viewed at the Presidio Trust Library and on the Trust's web site, and constitute part of the formal public record.*

displayed, and Trust staff were present to answer questions and make comment cards available.

The Trust also held two informal “open houses” on May 18, 2009 and May 20, 2009, at which Trust staff were available to respond to questions about the proposed projects for the Main Post as well as questions about historic resources, transportation and parking, visitor use, and environmental sustainability. Approximately 30 people attended the two sessions.

By the close of or shortly after the 87-day comment period for the supplement (March 6, 2009 – June 1, 2009), the Trust received comments from 7 public agencies, 1 elected official, 51 organizations, and 2,845 individuals, including form letters and those comments received on the draft SEIS.⁸ In general, commentors recognized and appreciated the changes the Trust made in plans for the Main Post between the draft SEIS and the supplement but still had key concerns about several of the proposed projects. Some appreciated the improvements to the CAMP’s design, size, and appearance to limit its visual prominence, while others felt the design was as “troubling” as the original proposal. Those commentors that previously were in favor of the lodge and theater welcomed the added improvements to the designs, noting that the changes were a step in the right direction. Others did not support demolition of Buildings 40 and 41 to better interpret the archaeological site of El Presidio. Many also remained concerned about

impacts related to traffic and parking, especially on surrounding neighborhoods.

CONTENTS OF THIS DOCUMENT

Following this introduction, the document is divided into two sections:

- Section 1: Background on Comments provides background demographic information on the comment letters, and a summary of the form letters and petitions received during the comment period.
- Section 2: Responses to Comments provides summaries of all comments received, along with written responses.

⁸ *Comment letters are available for review at the Presidio Trust Library, and constitute part of the formal public record.*

Background on Comments

This section provides demographic information on the comments received on the draft SEIS and supplement, including geographic origin, general affiliation with various government agencies or public interest groups, user type (neighbor, dog walker, etc.), and format (email, letter, comment card, form letter, oral, etc.). A summary of the form letters and petitions received during the public comment period is also provided. This information, which allows the Trust to better understand its commenting public, should be interpreted with caution, as those who commented do not constitute a valid random or representative sample of the general public. It should also be noted that regardless of the form or source of public comment, the Trust considered all comments and gave them equal attention.

1.1 GEOGRAPHIC ORIGIN OF COMMENTS

A total of approximately 2,829 separate comments in the form of emails, letters, comment cards, form letters, and petitions, with approximately 8,537 signatures, were received on the draft SEIS and supplement during the public comment period. A total of 1,488 written comments (emails, letters, and cards) were received from 14 states, the District of Columbia, and 3 foreign countries. Of those emails, letters, and cards for which addresses were provided, approximately 97 percent (775 individual submissions) were received from California (Table 1). Of those from California, 623 (80 percent) were from San Francisco. Comments from within the Presidio and nearby neighborhoods generated 227 letters and emails (36 percent of the San Francisco total) (Table 2).

1 ORIGIN OF WRITTEN COMMENTS

<i>Country</i>	<i>State</i>	<i>Number of Comments</i>
United States	Arizona	2
	California	775
	Colorado	1
	District Of Columbia	1
	Georgia	1
	Maryland	1
	Michigan	1
	Minnesota	1
	New York	2
	Ohio	1
	Oregon	2
	Tennessee	1
	Utah	1
	Virginia	1
Washington	1	
Italy		1
Sweden		1
United Kingdom		1
No Address Provided		693
TOTAL		1,488

2 REGIONAL DISTRIBUTION OF CALIFORNIA COMMENTS

<i>Region</i>	<i>Location</i>	<i>Zip Codes/ County</i>	<i>Number of Submissions</i>
City and County of San Francisco	Presidio	94129	46
	Neighborhoods Bordering Park ^a	94115, 94118, 94121, 94123	181
	Remainder of County		396
Subtotal			623
Other Bay Area Counties	North Bay		27
	South Bay		18
	East Bay		37
Subtotal			82
Other California	Northern California		2
	Greater Sacramento		5
	Central Coast		1
	San Joaquin Valley		5
	Southern California		4
	Unspecified California		53
Subtotal			70
TOTAL			775

^a Includes Cow Hollow, Pacific Heights, Presidio Heights, and the Richmond District.

1.2 ORGANIZATIONAL AFFILIATION OF COMMENTS

Eighty-seven (87) letters and emails were received from 59 federal, state, and local agencies and interested organizations. Neighborhood associations and heritage and historic preservation groups represented approximately half (43) of the letters and emails received from agencies and organizations (Table 3).

3 ORGANIZATIONAL AFFILIATION OF COMMENTS

<i>Type of Affiliation</i>	<i>Name</i>	<i>Number of Submissions per Affiliation Type</i>
PUBLIC AGENCIES	Advisory Council on Historic Preservation	10
	United States Department of the Interior, National Park Service, Golden Gate National Recreation Area (2)	
	United States Environmental Protection Agency, Region IX (2)	
	California Department of Parks and Recreation, Office of Historic Preservation (3)	
	City and County of San Francisco, Film Commission	
ELECTED OFFICIALS	City and County of San Francisco Landmarks Advisory Board	3
	City and County of San Francisco, Gavin Newsom, Mayor, Office of the Mayor	
NEIGHBORHOOD ASSOCIATIONS	City and County of San Francisco, Michela Alioto-Pier, Member, Board of Supervisors, District 2 (2)	22
	Cow Hollow Association (3)	
	Lake Street Residents Association	
	Laurel Heights Improvement Association (2)	
	Lombard Hill Improvement Association	
	Marina Community Association (4)	
	Neighborhood Associations for Presidio Planning (2)	
	Neighborhood Parks Council	
	Pacific Heights Residents Association (2)	
	Planning Association for the Richmond (2)	
	Presidio Heights Association of Neighbors	
Presidio Neighborhood Representative Work Group (2)		
Russian Hill Neighbors		

3 ORGANIZATIONAL AFFILIATION OF COMMENTS

<i>Type of Affiliation</i>	<i>Name</i>	<i>Number of Submissions per Affiliation Type</i>
HERITAGE AND PRESERVATION GROUPS	Buffalo Soldiers Library California Heritage Council (3) California Pioneers of Santa Clara County Coast Defense Study Group Council on America's Military Past (2) Los Californianos National Trust for Historic Preservation, Western Office Presidio Historical Association (6) San Francisco Architectural Heritage St. Francis #30 Chapter of the Questers Save the Presidio (2) Victorian Alliance of San Francisco	21
UNIVERSITY OR ACADEMIC GROUPS	Berkeley Law Workshop on Development and the Environment, University of California, Berkeley Department of Anthropology, Stanford University (2) Kumara School North America Reggio Emilia Alliance Reggio Emilia Institute, Sweden Reggio Emilia, Italy San Francisco Child Care Planning and Advisory Council Susan Lyon Education Foundation	9
CONSERVATION ORGANIZATIONS	EarthJustice Foundation for Ecology and Culture National Parks Conservation Association Presidio Environmental Council Sierra Club (2)	6

3 ORGANIZATIONAL AFFILIATION OF COMMENTS

<i>Type of Affiliation</i>	<i>Name</i>	<i>Number of Submissions per Affiliation Type</i>
PRESIDIO-BASED ORGANIZATIONS	Bay School of San Francisco Interfaith Center at the Presidio Presidio Bowling Center Presidio Child Development Center Presidio Community YMCA Tides Foundation	6
LOCAL CIVIC AND BUSINESS ORGANIZATIONS	Building Owners and Managers Association of San Francisco Richmond District Democratic Club San Francisco Chamber of Commerce (2) San Francisco Democratic Party	5
MUSEUMS AND ARTS ORGANIZATIONS	Academy of Motion Picture Arts and Sciences ArtSpan California Academy of Sciences	3
OTHER NON-PROFIT ORGANIZATIONS	MHONA International San Francisco Labor Council	2
TOTAL		87

1.3 FORM LETTERS AND PETITIONS

Approximately 1,335 out of 2,829 comment letters (47 percent) received during the public comment period for the draft SEIS and supplement were form letters⁹ reflecting the work of three or more organized campaigns (Table 4). The campaigns for the CAMP each generated 477 and 454 letters, respectively, for a total of 931 letters, or 70 percent of all form letters. In addition, 6 petitions¹⁰ with over 5,700 signatures were received, including one submitted by the Presidio Bowling Center signed by approximately 5,280 individuals (Table 5).

4 FORM LETTERS

<i>Subject</i>	<i>Number Received</i>	<i>Originator</i>	<i>Summary</i>
1. Tell the Presidio Trust that You Support CAMP	477	CAMP	Website (www.camptoday.org) provides information about CAMP and a page with “tips for effective letters” to allow viewers to send a message to the Trust in support of (or in opposition to) the contemporary art museum.
2. Support Building CAMP at the Main Post	454	CAMP	Advocates that the contemporary art museum is a once-in-a-lifetime opportunity for San Francisco that cannot be allowed to slip away.
3. Which Vision of the Presidio Do You Want?	9	Save the Presidio	Flyer urges recipients to let the Trust know that they oppose plans for the contemporary art museum, lodge, and Presidio Theatre proposals.
4. Save the Presidio and Oppose Plans for National Park	28	Save the Presidio	Website (www.savethepresidio.org) urges viewers to help save the Presidio from excessive development, and provides sample text for letter expressing concern for proposals at the Main Post.
5. Reject the Proposal Currently under Consideration	42	Marina Community Association	Expresses neighbor concerns over plans for the CAMP, lodge, and above-ground parking at the Main Post, and the potentially negative impact on the neighborhood.
6. Oppose the Plans to Construct an Art Museum in the Presidio	324	Unknown	Opposes loss of historical character and status, loss of recreation, and traffic congestion. Suggests there are better sites for the museum within the city.
7. Deep Concern about the Modern Art Museum Proposal Near the “Sacred” Main Parade Ground	— ^a	Unknown	Asks the Trust to reject the Main Parade alternatives (Alternatives 2 and 2A) and consider other alternatives, in particular the Commissary location for the contemporary art museum (Alternative 1).

^a Approximately 550 identical emails generated from one user account (nobody@earthlink.net) were received before the account was blocked in order to avoid compromising the Trust’s information systems.

⁹ Form letters were defined as those letters that were received separately but containing identical or very closely paraphrased text.

¹⁰ Petitions were defined as single letters signed by multiple members of the public.

5 PETITIONS

<i>Subject of Petition</i>	<i>Number of Signatures</i>	<i>Originator</i>	<i>Summary of Comments</i>
1. Protest the Trust’s Proposals and Disapprove Alternatives 2, 2A and 3	~200	Save the Presidio	Objects to the “large-scale” development being proposed for the Main Post by the Trust and the Fishers, and to the potential loss of the National Historic Landmark designation.
2. Protest the Demolition of the Bowling Center for CAMP	38	Happy Hour League of the Presidio Lanes	Requests a new bowling center built at the Presidio with free parking available and opened prior to closing the current structure.
3. CAMP should not be Located at Main Parade	17	Workers within the Presidio	Offers beliefs that adding a modern structure to the Main Parade would destroy its openness and historical presence, and that other areas within the city would benefit more by having the museum.
4. Disapprove Trust Plans to Close the Bowling Center	~5,280	Presidio Bowling Center	Opposes the Trust’s plans to close the bowling center without plans to relocate it. Submits that the bowling center is a valuable community resource that should remain.
5. Oppose the Current “Preferred Alternative” for the Main Post	34	Heidi Englebrechten	Requests that the Trust not consider the art museum, theater, and hotel proposals. Asks that the proposals seek an appropriate home in the city.
6. Oppose the Trust’s Traffic Plans in Connection with Doyle Drive Reconstruction and the Main Post Proposals	~145	Presidio Avenue Neighbors	Expresses concern about the methodology, results, and recommendations of the SEIS, especially related to traffic impacts on the neighborhoods surrounding the Presidio and traffic impacts on the roads leading to the Presidio and Arguello Gates.

1.4 SELF-IDENTITY OF COMMENTORS

Slightly more than half of the commentors submitting written comments (805 individuals) did not identify themselves as a particular type of user. Of the 683 commentors that explicitly characterized themselves in some particular manner (e.g., “I am a resident of San Francisco”), the largest groups were

local residents (San Francisco, Presidio, Marina, Cow Hollow, lifelong, etc.) (30 percent), neighbors (11 percent), and San Francisco natives (10 percent), accounting for approximately half of the user identities. Frequent users of the Presidio and business owners accounted for another 8 percent of the user types (Table 6).

6 SELF-IDENTITY OF COMMENTORS (USER TYPES)

<i>User Type</i>	<i>Number of Comments</i>
Architect	9
Architect with Long Ties to the Bay Area	1
Ardent Fan of San Francisco's Unique Visual Treasures	1
Ardent Preservationist	1
Army Captain (1966-1969)	1
Artist	5
Art Lover	2
Bad Tennis Player	1
Bay Area Resident	1
Board President of a Non-Profit Headquartered in the Thoreau Center	1
Bowler	2
Bowling Alley User	9
Bowling Fan	1
California Native	1
Californian	1
Camping Enthusiast	1
Child Development Center Parent	11
Citizen Concerned with the Preservation of Historical Sites for Future Generations	1
Citizen of San Francisco	4
Co-Author of the Cultural Landscape Assessment of the Main Post	1
Concerned Citizen	7
Concerned Neighbor	2
Concerned San Franciscan	2
Cow Hollow Resident	29
Current President of the Happy Hour League of the Presidio Lanes	1
Descendent of Members of the de Anza Expedition	1
Disabled Navy Veteran	1
Distant Relative of General Joseph Stilwell	1

6 SELF-IDENTITY OF COMMENTORS (USER TYPES)

<i>User Type</i>	<i>Number of Comments</i>
Dog Walker	1
Early Childhood Educator	1
Early Childhood Specialist and Community College Instructor	1
Education Professor and Co-Director of a Private Non-Profit Preschool	1
Employee of LucasArts	1
Ex-Active Duty Army Physician	1
Ex-Chairman of the Advisory Commission for the Golden Gate National Parks (1990-1992)	1
Ex-Member of the Presidio Trust Board of Directors (1997-2003)	1
Family Member of 3 who are Buried at the Presidio	1
Father of a 5-Year-Old that Attends the Presidio CDC	1
Father of a New Student at Presidio CDC	1
Father of 2 Children at the Presidio CDC	1
Fifth Generation San Franciscan	1
Founder of the Lincoln Highway Association	1
Fourth Generation San Franciscan	2
Former General Managers of the Presidio of San Francisco	3
Former Military Personnel Stationed at the Presidio	4
Former NYC Elected Official	1
Former President SF Planning Committee	1
Former Presidio Resident	1
Former Resident of San Francisco	2
Former Resident of the Presidio	1
Former San Francisco Mayor	1
Former Teacher	1
Frequent Hiker in the Presidio	1

6 SELF-IDENTITY OF COMMENTORS (USER TYPES)

<i>User Type</i>	<i>Number of Comments</i>
Frequent User	32
Frequent Visitor to San Francisco	4
Frequent Visitor to the Presidio	1
Frequent Visitor to the Presidio and San Francisco	1
Frequent Weekend Visitor	1
From Taiwan	1
Grandmother of 3 Small Children that Attend the Presidio CDC	1
Grandparents of 2 Little Girls who have Attended the Presidio CDC	1
Grandson of General John Phillip Wisser	1
Historian	5
Home Owner	3
Home Owner in Jordan Park	1
Home Owner in Nearby Southern Sausalito	1
Infant/Toddler Teacher	1
Korean War Veteran	2
Lifelong Member of the Fine Arts Museum of San Francisco	1
Lifelong Resident of San Francisco	2
Local	2
Long-Term Partner of Trust's Historic and Archaeological Research and Interpretation Program	1
Long-Time Art-Loving Resident of the Bay Area	1
Long-Time Fan of the Presidio	1
Long-Time Neighbor and Dedicated Park Steward	1
Long-Time Participant in the Presidio's Evolution to a Park	1
Long-Time Real Estate and Planning Professional	1

6 SELF-IDENTITY OF COMMENTORS (USER TYPES)

<i>User Type</i>	<i>Number of Comments</i>
Long-Time Residents	3
Long-Time San Franciscan	2
Long-Time Supporter of San Francisco Arts	2
Lover of Art Museums	1
Lover of Contemporary Art and Architecture	1
Lover of Modern Art	1
Lover of the Presidio	4
Marina Resident	46
Member and Supporter of the SFMOMA and de Young Museums	1
Member of the California Historical Community	1
Member of the Cow Hollow Association	1
Member of the de Young and Legion of Honor	1
Member of the Golden Gate National Park Conservancy	1
Member of the San Jose Historical Museum	1
Member of the William Kent Society	2
Mother of 3 Boys who Love Bowling	1
Mother of 3 Small Children	1
Museum Go-er (and Member)	1
Native of the Bay Area	1
Nature Lover	1
94-Year-Old Air Force Retiree	1
Not a Native of Your Wonderful City	1
Not a Specialist of the Presidio Trust's Politics	1
Not Anti-Museum	1
Not Frank Fanelli, but Using his Computer	1
Old Lady (72)	1
Old-Time San Franciscan	2
One of the Luckiest [Former] Majors in the U.S. Army	1

6 SELF-IDENTITY OF COMMENTORS (USER TYPES)

<i>User Type</i>	<i>Number of Comments</i>
One of the Privileged Few to Live in a National Park and Major American City	1
One of Your Constituents	1
Owner of a Business	21
Pacific Heights Resident	1
Parent	8
Person who Spent her Formative Years as a Military Dependent	1
Post Veterinarian of the Presidio (1980-1983)	1
Pre-School Teacher	1
Pre-School Teacher in Oakland	1
President of Corbett Heights Neighbors	1
Presidio Employee	11
Presidio Neighbor	71
Presidio Heights Resident	8
Presidio Resident	28
Presidio Tenant	1
Presidio Visitor	1
Progressive Marina Resident	1
Project Manager of the September 2002 Cultural Landscape Assessment	1
Promoter of Historic Buildings	1
Proponent of Maintaining the Real Historical Look of the Presidio	1
Proud Bay Area Resident for 79 Years	1
Real Estate Agent	2
Redwood City Resident	1
Resident of the Area	1
Resident on Arguello Boulevard	1
Resident since 1969 Originally from the Midwest (Chicago)	1
Retired CCSF Planner	1
Retired History Teacher	1
Retired Military Officer	1

6 SELF-IDENTITY OF COMMENTORS (USER TYPES)

<i>User Type</i>	<i>Number of Comments</i>
Richmond District Resident	15
San Franciscan with an Appreciation of the Long History of the Presidio	1
San Francisco Home Owner	1
San Francisco Lawyer	1
San Francisco Native	72
SF Property Owner	1
San Francisco Resident	66
San Francisco Tour Guide	2
San Francisco Visitor	5
San Francisco Voter	7
2 nd -Grade Student and Future Negotiator and Debater	1
Senior Citizen	4
Sierra Club Hike Leader	1
Sister of Jason and Genuine Supporter of Presidio CDC	1
6 th -Army Member (1962-1964)	1
Small Business Owner	1
Someone Who has been Intimately Involved in Motion Picture Exhibition in San Francisco for 32 Years	1
Someone Who has Worked in the Art World for 30 Years	1
Someone Who Grew Up in Upstate NY	1
Someone Who Regularly Visits the Presidio	1
Special Education Teacher for the Presidio CDC	1
Strong Preservationist	1
Student of History and Culture	1
Sunset Resident	1
Supporter of CAMP	3
Supporter of Fine Art in San Francisco	1
Taxpayer	6

6 SELF-IDENTITY OF COMMENTORS (USER TYPES)

<i>User Type</i>	<i>Number of Comments</i>
Teacher	4
Teacher and a Mother	1
Tenant in Building 39	1
Third-Generation San Franciscan	3
30-Year Resident of Pacific Heights Now in Exile in Kentucky	1
30-Year Resident of San Francisco	3
35-Year Resident of the Bay Area	1
[Unlicensed] Architect	1
Veteran	3
Visitor and Fan of San Francisco	1
Visual Artist and Art Instructor	1
Volunteer Docent for the Presidio	1
Volunteer to the Presidio CDC	1
Volunteer Tutor	1
Voter since 1982	1
Wisconsin Native Living in Minnesota	1
Working Parent	2
YMCA Member	7
TOTAL	683

1.5 FORMAT OF COMMENTS

Approximately 77 percent of all commentors choosing to submit their own comments generally sent their written comment letters by email. Only 93 commentors chose to provide their comments orally at one or more of the public hearings without also submitting their comments in writing, while 36 commentors submitted comment cards that were distributed by the Trust before public meetings or following Main Post tours and walks (Table 7).

7 FORMAT OF COMMENTS

<i>Response Format</i>	<i>Number of Comments</i>	<i>Number of Signatures</i>
Email	1,140	—
Letter (Mail or Fax)	312	—
Comment or Speaker Card	36	—
Form Letter	1,335	1,335
Petition	6	5,714
Unique Oral Comment	93	—

Responses to Comments

This section provides responses to all substantive public comments received on the draft SEIS and supplement to the draft SEIS for the Main Post Update.

2.1 METHODOLOGY AND ORGANIZATION

The volume of comments received and similarity of issues raised provided both the opportunity and the necessity to summarize the comments in order to allow for meaningful responses. Comments and responses were grouped by topic headings generally corresponding to the formats used in the draft SEIS and supplement, and further divided into subject matter summaries. A total of 19 general topic headings and 134 subject matter summaries were used, as listed in the Table of Contents.

Depending upon the level of public interest within a topic and its subject matter, comment summaries may encompass comments submitted by substantial numbers of commentors, or very few. Responses immediately follow each subject matter summary and have been prepared by Trust staff and consultants following review of the comment summary and the full text of the original comments. All comments have been considered and responded to equally. Their importance is not weighted by the source of the comment or any commentor characteristic. The consideration of public comment is not a vote-counting process. Every comment or suggestion has value, whether expressed by one or a hundred commentors, and comments have been addressed for their substance, not for their frequency.

Responses provide explanations and clarifications related to the contents of the draft SEIS and supplement. Where changes in or additions to the text of the documents have been made in response to comments, these are identified. Questions posed by the commentors are either answered or acknowledged as outstanding issues. References to the draft SEIS, supplement, technical analyses, and other source materials are included as appropriate. Cross-referencing between responses is kept to a minimum, resulting in some repetition where the subject matter of comment summaries is similar. Nonetheless, the reader may be referred to more than one group of comments and responses to review all information on a given subject.

Many comments made both in writing and at the public hearings were directed toward the content of the Main Post Update. While these comments did not concern the adequacy or accuracy of the SEIS and therefore do not merit discussion under the NEPA, responses are provided. 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 one of the planning proposals or alternatives, all comments have been taken into account in preparing the final SEIS and will be considered by the Trust in reaching its final decision following circulation of the final SEIS.

2.2 MAIN POST UPDATE

1 The Main Post Update Ignores Commitments Made in the PTMP

The Main Post Update is not simply an update of the PTMP, but contradicts some of the basic assumptions and goals of the document. The PTMP places the “highest priority” on “actions that carry out the preservation, rehabilitation, and use of historic buildings and landscapes,” a priority that is clearly compromised by the current proposal. The PTMP was based on a promise and an understanding between the Trust and the public worked out over many years and with considerable debate. The Main Post Update breaks that promise and ignores the delicate, longstanding balance between financial self-sufficiency and preservation of natural and cultural resources developed in negotiation between the community and the Trust.

Response The purpose and need for the Main Post Update are consistent with the PTMP’s vision for the Main Post as the “heart of the park.” The Trust’s focus remains the “preservation, rehabilitation, and use of historic buildings and landscapes” in the Main Post and throughout the park. The Main Post Update has changed as a result of public review under the NEPA and NHPA and proposes less overall square footage in the Main Post than does the PTMP. The Main Post Update does provide for 70,000 square feet of new construction for a lodge, rather than the 50,000 square feet assumed in the PTMP for additional office use in the Main Post. New construction would make lodging feasible in the Main Post and would bring a visitor amenity that is traditional in national parks. The Trust would also rehabilitate historic Pershing Hall (Building 42) for lodging.

The Trust has engaged with interested members of the public for more than two years to develop the Main Post Update. The Main Post Update is responsive to many of the concerns expressed by the public, including the level of development in the Main Post.

2 The Proposed Action Is Inappropriate for the Main Post

The Main Post is the heart of the Presidio, of which the Main Parade is a key component, if not the essence. The Main Post Update includes four components (art museum, lodge, terraced lawn, and theater) that are fundamentally incompatible with the historic character of the park and undermine core values of the Main Post. The combined effect of the four additions to the Main Post would fundamentally alter the entire area, converting it from a rich historic district to an upscale mall with little of the charm or character that one might experience in visiting the Presidio.

Response The Main Post Update has been changed as a result of the public review process under the NEPA and NHPA. The proposal to build a museum of contemporary art (CAMP) has been withdrawn; the design concept for a lodge has been modified to reflect the scale and footprint of barracks buildings that once stood on the site proposed for new construction; and designs for both the interior configuration of the theater and its new addition have been modified. Both NEPA and NHPA compliance for rehabilitating the Main Parade were completed in 2007 with a finding of no significant impact.

The Main Post Update retains the Trust’s longstanding commitment to reveal and elevate the Presidio’s history and to make the park a welcoming place for the public.

3 The Trust Finds Only “Potential” for Main Post as a Heritage Site

In the Main Post Update, the Trust appears tentative about the concept of the Main Post being an important heritage site, suggesting that it only has the potential to be an important heritage site. The Trust should promote the Main Post for the important heritage site that it is today and build its programs around that concept from the outset.

Response The Trust is fully committed to ensuring that the Main Post becomes the important heritage site it should be. Today, much of the Presidio’s most important heritage is not discernible. El Presidio, the original Spanish garrison and the birthplace of San Francisco, remains largely hidden. The grand open spaces have lost much of their definition, having been degraded by asphalt and obscured by parking. The Main Post Update would elevate the historic and cultural resources in the Main Post by providing for excavation, interpretation, and surface treatments of El Presidio; an archaeology lab and curation facilities that engage students and the public in the science of archaeology; and a Heritage Center that invites visitors to explore the Presidio’s history in depth. The Main Post Update also provides for the rehabilitation and reuse of historic buildings and landscapes, allowing for greater public benefit.

4 The Trust Finds Main Post Open Space Is Not Compelling

The Trust suggests that changes have eroded features that make the Main Post’s open spaces compelling. This assertion is not substantiated and is in direct contrast to statements in the PTMP. No features have eroded since 2002 when the PTMP was written. This statement appears to have been added in an attempt to support new, large-scale construction. To the contrary, the Main Post open space is compelling and the proposed new

construction would close important visual connections between parade grounds.

Response In the draft Main Post Update, the Trust stated, “Changes since World War II, especially the conversion of parade grounds to asphalt parking lots, have eroded many of the features that make the post’s open spaces compelling.” The Army paved over the Main Parade and El Presidio and demolished buildings that had separated the Old Parade and Main Parade and had given the parade grounds definition. In the 1940s, the Army built “temporary” barracks on top of El Presidio, diminishing its spatial character. Rehabilitation of El Presidio and the Main Parade was envisioned in the PTMP. The Trust still intends to rehabilitate the Main Parade by replacing asphalt with grass and landscaping, consistent with what was presented in the PTMP. NEPA and NHPA compliance for the Main Parade rehabilitation was completed in 2007 after two years of public process. The Main Post Update calls for rehabilitating El Presidio, which was also identified in the PTMP.

New construction on the site south of Building 34 was identified in the PTMP as a way to re-establish the separation between the Old Parade and Main Parade. The Main Post Update proposes to demolish Building 34, which does not contribute to the National Historic Landmark District (NHL), and to construct a 70,000-square-foot lodge on the site. The design concept for the lodge has been modified to be more compatible in size and scale with Buildings 86 and 87; it reflects the footprint and scale of barracks buildings that once stood on the site. Demolishing the “temporary” World War II barracks that were built on top of El Presidio would allow the public to experience El Presidio’s spatial character, which the Trust believes has greater historic value than the barracks buildings. This approach is consistent with the approach

taken by the National Park Service (NPS) when more than 30 similar buildings were removed from Crissy Field to re-establish the spatial character of the earlier airfield.

5 The Art Museum Visually Stifles the Historic Character of the Main Post

The Main Post Update lists the PTMP core Guidelines for Buildings and Structures, focusing on retaining and restoring historic buildings and connections, requiring new “infill” to be compatible. The Main Post Update presents the contemporary art museum as contributing significantly to the character of the Main Post and the lodge as re-establishing the missing spine between the Old and Main Parade grounds. The museum design, massing, and location would create adverse impacts that could not be mitigated in any reasonable manner without drastic alteration of the proposed action.

Response The proposal for the museum of contemporary art (CAMP) on the Main Post has been withdrawn. The proposed lodge that elicited the comment has since been extensively downsized and revised to respond to commentors’ concerns.

6 The Art Museum Is Not Relevant to the Presidio Visitor Experience

An art museum would not add a relevant new dimension to the visitor experience. A large, modern building would overwhelm the Main Parade, and would create an unrelated building and contents that have nothing to do with the essential elements of the park. The Trust should provide a rationale for why all the other activities proposed for the Main Post focusing on the essential elements of the park, are not sufficient to attract visitors and explain why an added, unrelated attraction and unrelated structure at that site are necessary.

Response The proposal for the museum of contemporary art on the Main Post has been withdrawn.

7 The Lodge Should Not Be Built as Described

The proposed lodge’s scale and design are out of place and would dominate the proposed history walk along the east side of the Main Parade. The large hotel would form a barrier, as opposed to a connection, between the Main Parade and the Old Parade grounds. The Trust should reengage the public on the design, scale, and massing of the hotel. Lodging on the Main Post should focus, at least largely, on re-using existing structures, including Pershing Hall and the Montgomery Street Barracks. It may be appropriate to evaluate lodging built on a substantially smaller scale (height and size) where the proposed action suggests building the large hotel. The new building should maintain a similar footprint as the current one.

Response The design concept for the lodge has evolved through the Section 106 consultation under the NHPA. The new concept for the lodge reflects the scale and footprint of the barracks buildings that were once located on the site between the Old Parade and Main Parade. New construction on the Graham Street site is a concept supported by the Trust’s 2002 cultural landscape documentation as a means to re-establish the separation between the Old and Main Parades that existed during much of the period of significance. New construction would not exceed 70,000 square feet and would be broken up among several small-scale buildings connected by open-air porches. Height restrictions for the new lodge construction would keep it lower than neighboring historic buildings 86/87 and setbacks from other nearby historic buildings (Building 95, the Powder Magazine) would further reduce its effects.

The Programmatic Agreement for the Main Post Update (PA-MPU) (Appendix B of the final SEIS) would set the parameters for further design development, consultation, and review.

8 The Main Parade Is in Sharp Contrast with the Historic Landscaping and Buildings

The upper portion of the Main Parade would become a terraced, hard surface and lawn designed to be compatible with the art museum. The effect of the modern terracing showcases the art museum on an even grander scale as the main focal point of the Main Parade, creating a monumental presence. A complete picture of the Main Parade's appearance and impact, along with the Anza Esplanade buildings, lodge, and art museum, should be presented and analyzed together in their entirety.

Response Greening the Main Parade has long been identified as a key park-making project. NEPA and NHPA compliance for rehabilitation of the Main Parade was completed in 2007 after two years of public process. The design continues to evolve based on public input and the Trust has scaled back the design elements, which now include more landscape and less hardscape than initially proposed. The design concept for the Main Parade remains constant; however, the concept is to remove the parking, replace asphalt with grass, and landscape the eastern edge to return the Main Parade to its initial size and configuration. The Main Parade is evaluated as a cumulative action in the final SEIS.

9 Parking Is Not Identified in El Presidio Figures

The Main Post Update figures do not properly indicate the full extent of parking areas on El Presidio. El Presidio should be restored and parking eliminated from this location.

Response Under the Main Post Update (analyzed as Alternative 2 in the final SEIS), the Trust would reduce the amount of parking on El Presidio, retaining only 75 daily spaces. Figures have been amended accordingly.

10 Road Closures Are Designed to Support the Art Museum and Not Main Post Circulation

The road closures identified in the Main Post Update are designed to support the art museum and are at the expense of the rest of the Main Post, reducing options for traffic circulation and potentially creating traffic bottlenecks. The Trust should not close Sheridan Avenue from Graham Street to Montgomery Street, or Arguello Boulevard from Moraga Street to Sheridan Avenue. These closures restrict future options and constrain traffic. The streets might be closed temporarily for events.

Response Proposed traffic circulation in the Main Post Update is consistent with guidance provided in the PTMP: "The Main Post will be the central arrival area for Presidio visitors, and will become a lively pedestrian district. Site improvements that enhance the historic setting and open spaces will provide clear hierarchy of vehicular and pedestrian circulation routes" (PTMP, page 63). Closing streets to vehicular traffic in the center of the Main Post is intended to improve pedestrian circulation and to enhance the visitor experience of the historic district. Plans would also improve vehicle circulation, creating a "clearer hierarchy of vehicular and pedestrian circulation routes" (PTMP,

page 63). The closures of Sheridan between Graham and Montgomery and Arguello between Moraga and Sheridan to vehicular traffic were described in the Main Parade EA. Removing vehicular traffic from these street segments is an important part of improving pedestrian circulation and the visitor experience in the Main Post. Restricting automobile traffic from these roadway segments would shift additional traffic to other nearby roadways, but the additional traffic would not result in significant congestion on other roadways. As documented in Section 3.3 Transportation of the final SEIS, the nearby intersections of Sheridan/Montgomery and Arguello/Moraga are expected to operate at level of service (LOS) C or better in 2030.

11 The Vision for the Park Should Be a Collaborative and Shared Concept

The Main Post Update refers to the Trust's vision for the park rather than a vision established with its administrative partner (the NPS) and the community. The Trust should reconsider this view and instead offer proposals to its partners and the community for consideration and collaborative planning, well in advance of producing PTMP amendments.

Response Public participation in planning for the Main Post has been ongoing for nearly two decades, beginning with the 1994 NPS General Management Plan Amendment (GMPA). The Trust engaged the public, government agencies, and historic preservation groups throughout two years of public planning and compliance for the PTMP, two years of developing plans for rehabilitating the Main Parade, and throughout the past three years of developing the Main Post Update. Plans for the Main Post tier from the PTMP. Input from the public, the NPS, and historic preservation organizations has greatly influenced the development of the

Main Post Update, which remains consistent with the vision for the Main Post that was put forth in the PTMP and the GMPA before it.

12 The Legislated Role of the NPS Visitor Center Should Be Discussed

The Presidio Trust Act states that the Secretary of the Interior shall retain jurisdiction over Building 102 for use as a visitor center and that the NPS, in cooperation with the Trust, is responsible for "providing public interpretive services, visitor orientation, and educational programs" in the Presidio. All the figures in the SEIS show Building 102 as vacant/underutilized for its land use category rather than cultural/educational, while other vacant buildings are shown with an assumed future use. Furthermore, the role of the NPS visitor center identified in the Presidio Trust Act and the Heritage Center identified in the Main Post Update needs to be explained in light of discussions held to date between the NPS and the Trust regarding a combined visitor center.

Response In response to the comment, figures have been changed to identify Building 102 as under the jurisdiction of the National Park Service; the Trust's 5-Year Construction Plan has also been changed. Building 102 is not part of the Main Post Update because it is not part of Area B, nor has anything changed about its expected use since the PTMP was released in 2002. Shortly after the PTMP was released, Building 102 was vacated and has remained vacant, awaiting rehabilitation.

The Trust and the NPS have recently entered into an agreement to plan for a visitor center. While the visitor center would provide broader visitor orientation, the proposed Heritage Center would provide more specific opportunities to explore the Presidio's history. Should the NPS and Trust's decision making about the location of the visitor center require

additional public process and review under the NEPA and NHPA, the agencies would undertake this process and review at the appropriate time. The programmatic relationship between the visitor center and the Heritage Center would be addressed in the course of planning for the visitor center.

The Trust and the NPS have collaborated on a variety of interpretive and programmatic efforts since the Trust assumed jurisdiction of Area B in 1998. The Trust will continue to collaborate with the NPS. This collaboration is reflected in the final Main Post Update.

13 The Heritage Center Should Be Explained

The program description for the proposed Heritage Center appears to overlap in function and staffing with the NPS visitor center. The Trust should review and build upon previous planning work in the area of interpretation for the development of the Heritage Center concept. It is also unclear how the proposed center in the alternatives relates to the NPS visitor center. This should be clarified and the Trust should confirm Building 102 as the NPS visitor center unless and until an alternative location, if determined, is mutually agreed upon between the NPS and the Trust. The important role of the NPS in providing these services should be clearly reflected.

Response In response to the comment, figures have been changed to identify Building 102 as under the jurisdiction of the National Park Service. The Heritage Center is intended to provide opportunities to explore the Presidio's history in depth. It would have the same relationship to a visitor center as the Presidio Nursery might have, that is, as a place where one might pursue a particular interest in depth (i.e., nursery operations, plant biology and propagation techniques, park

restoration efforts), as opposed to a visitor center, which is intended to provide general orientation and visitor services.

14 The Placement of the Heritage Center De-Emphasizes the Historic Elements of the Visitor Experience

By placing the Heritage Center in the back of the Officers' Club, the Trust pushes history and the true nature of the Presidio and the Main Post away from the visiting public, where it would be encountered only accidentally or by the truly inquisitive. Visually out of the way and unlikely to be found, the back of the Officers' Club is simply without credibility as a site that would "offer the public a place to begin their exploration of the historic post." Furthermore, the proposed location of the art museum would severely distract from and diminish the importance of the Officers' Club and EI Presidio.

Response The Heritage Center is not planned for the back of the Officers' Club, but for the eastern side of it, with an exhibition in the current exhibition hall, a 5,000-square-foot, state-of-the-art exhibition facility. The Officers' Club is the oldest building in San Francisco and one of its most symbolic; it therefore seems a most fitting place to locate the Heritage Center, which would be prominent in the building. The Heritage Center would not compete with the art museum for prominence, as the CAMP has been withdrawn from further consideration.

15 Buildings 97, 40, and 41 Should Not Be Demolished

These three buildings are the only structures in the Main Post district constructed during World War II. Therefore, demolition of these buildings would eliminate a layer of history that contributes to the significance of the NHL. Buildings 40 and 41 should be kept in place

until such time as the Trust is ready to commemorate El Presidio and develop plans for their transfer to another portion of the property, such as Crissy Field. Building 97 could be moved as stated in the Main Post Update, and would retain its context and alignment with Arguello Boulevard. Building 97 should be rehabilitated for future use and occupancy and brought up to current seismic code.

Response Buildings 3, 37, 40, 41, and 97 on the Main Post were constructed during the World War II era. After the United States entered World War II, the Presidio became the nerve center for Army operations in defense of the Western United States and Gen. John L. Dewitt led the IX Corps and Fourth Army from his headquarters (Building 35) at the Main Post. Additionally, the adjacent, large-scale identical barracks that were constructed in 1940 (Buildings 38 and 39) were used to support the wartime mission, as were other existing facilities on the Main Post. Buildings 3, 37, 40, and 41 all represent the World War II-era “temporary” type of military construction, of which there are 16 other individual examples in the Presidio, and several more intact collections within the Golden Gate National Recreation Area (notably at Fort Cronkhite).

Under the mitigated preferred alternative (Alternative 2), Building 97 would be retained in its present location and reused. Landscape treatments would be reviewed as treatments are developed for the *plaza de armas*, the first designed open space and the first military parade ground on the Presidio. The Trust has committed in the PA-MPU (Appendix B of the final SEIS) to engage in further consultation before making a decision on the final treatment of Buildings 40 and 41. The Trust foresees removing or relocating Buildings 40 and 41 to re-establish the spatial character of the original plaza. This approach is analogous to

the one taken by the NPS in their successful rehabilitation of the historic Crissy Field, which had been similarly obscured by parking and required the removal of later historic buildings for the airfield to re-emerge in the landscape.

Throughout the Main Post and the park there is considerable evidence of the second century of the Presidio’s development and of its history as an American Army post. But there is virtually no evidence of its first hundred years – of the ambitions of imperial Spain, the impact of colonialism on indigenous peoples, the intentions of a newly independent Mexico, and the frontier expansion of the United States. El Presidio is arguably one of the most important and symbolic sites in the western United States. These considerations would support the removal or relocation of Buildings 40 and 41.

16 Building 46 Should Not Be Demolished for the Archaeology Lab

The Presidio Trust could incorporate Building 46, a contributing resource to the NHL, into the plans to recreate a connecting structure that would link the archaeology conservation lab and collections facility. The retention of this building would also reduce the amount of square footage slated for demolition and support the overall goal of preserving contributing elements to the NHL.

Response Building 46 is a 50-square-foot shed that is in dilapidated condition. It is not feasible to incorporate it into the proposed archaeology lab and curation facilities. The Trust would work with the NPS Heritage Documentation Program to undertake appropriate Historic American Building Survey (HABS) recordation, which is an accepted mitigation.

17 Anza Street Should Retain the Look and Feel of a Street and Not Blend Into the Main Parade

If Anza Street is closed as part of the proposed Anza Esplanade circulation plan, the Trust should ensure that it retains the look and feel of a street rather than being designed to blend into the Main Parade. While the street would be closed to vehicular traffic, retaining the look of a functioning street would convey to visitors the feeling and association of vehicular and pedestrian circulation established when it was an active military installation.

Response While removal of cars and asphalt would alter the present-day appearance and function of Anza Street and other historic streets closed to vehicular traffic, features of the rehabilitated roads, including width, alignment, and paving materials designed as part of the roadway rehabilitations, would be historically compatible.

18 Building 99 Should not Be Subdivided

Building 99 should not be subdivided into two separate screening rooms as part of the Presidio Theatre project. Though the subdivision is planned to be reversible, the act of subdividing the auditorium would diminish the ability of this important interior space to contribute to the building's overall integrity.

Response As outlined in Section 2, Alternatives, of the final SEIS, the theater's interior would not be subdivided.

19 Traffic Lights on the Main Post Should Be Limited

The Trust should limit the number of traffic lights needed in the Main Post district and rely on other forms of traffic calming devices, such as stop signs, to handle the anticipated increase in visitorship.

Response The Trust would not install traffic lights in the Main Post and would continue its traffic demand management programs to reduce the number of cars in the Main Post and throughout the park.

20 The Number of Housing Units Is Unclear

The Trust made a commitment in the PTMP to a range of residential units Presidio-wide. Included in this was a maximum range of 140 to 155 residences at the Main Post, including up to 50 units within new construction. It is not clear what the housing unit total for the Main Post is for each alternative and how these numbers would affect the Presidio-wide unit goal.

Response The number of residential units identified in the PTMP is a park-wide cap of 1,654, not a target number. For each planning district, the number of planned units was presented as a range that reflected general goals. For example, the range of residential units within new construction in the Main Post was estimated at 0 to 50. As stated in the PTMP, "achieving these goals depends on site-specific assessments of building configuration and financial feasibility, as well as progress towards meeting other planning objectives." The PTMP also recognized that the "Main Post historically accommodated a mix of residential and non-residential uses, and a mix of conventional dwelling units and group quarters." The Main Post Update plans to retain a mix of residential and non-residential uses, including the 139 residential units existing at the Main Post. At this time, there is no "domino effect" anticipated because of a reduced number of residential units in the Main Post; if anything, the Main Post Update would reduce the impacts in the Main Post from what was previously anticipated in the PTMP.

2.3 NEPA PROCESS

21 The Main Post Planning Process Has Been Seriously Compromised

The NEPA process has been used to promote a single proposal already received rather than seriously evaluate a wide range of reasonable alternatives for revitalizing the Main Post. The intent of the NEPA process is not being met. The Trust should withdraw the art museum and lodge proposals and suspend the current process.

Response Consistent with the commitments made in the PTMP (pages 128, 130-131), in 2007 the Trust notified the public of its intent to amend the PTMP. The Trust undertook an extensive planning and public review process for a set of projects and improvements, including new construction for a contemporary art museum (CAMP), new construction for a lodge, removal of historic buildings to reveal the original El Presidio, development of an archaeology lab and Heritage Center, rehabilitation of the Presidio Theatre with construction of an addition, construction of an addition to the Presidio Chapel, and parking and circulation improvements that require pedestrianizing roads and building new parking lots. Under the provisions of the NEPA, the Trust began scoping for the Main Post Update in November 2007. In June 2008, the Trust issued a draft Main Post Update and a draft SEIS that analyzed five alternatives for the Main Post. Concurrent with the environmental review, the Trust also engaged in a Section 106 consultation under the provisions of the National Historic Preservation Act (NHPA), and released a draft Finding of Effect (FOE) in August 2008.

In February 2009, the Trust identified a preferred alternative and issued a revised draft Main Post Update and a supplement to the draft SEIS. In July 2009, the Trust issued a final FOE, concluding the assessment phase

of the Section 106 consultation, and began the process of resolving the adverse effects that had been identified in the FOE. Throughout the process, documents were available for public review and comment for a minimum of approximately 90 days.

The mitigated preferred alternative (Alternative 2) has changed as a result of both the NEPA and NHPA processes and has been modified specifically to avoid, minimize, or mitigate adverse effects on the National Historic Landmark District as well as to respond to concerns raised by members of the public who have participated in the process. Some of the more substantive changes are as follows:

1. The proposal for the art museum has been withdrawn from further consideration.
2. The amount of construction for a lodge has been reduced and design concepts have changed considerably to reflect the scale and footprint of barracks that once separated the Old Parade and Main Parade grounds.
3. Both the addition to the theater and the configuration of its interior have been modified to preserve the building's historic character.
4. The orientation of the addition for the Presidio Chapel has changed.
5. The historic garages (Buildings 113 and 118) along Taylor Street would be retained.

22 Significant Revisions to the Project Warrant Circulating a Revised Draft SEIS

There have been many "significant revisions" to the project and to its alternatives, as documented in part in the changed Main Post Updates

and undertakings. The last public comments on the draft SEIS and supplement were requested by the Trust in February 2009, and later comments have been kept out of the record. It is not possible for the public to comment on the most recent description of the project described in the administrative Main Post Update of March 2010, and there may have been more changes since that time.

Response According to the CEQ NEPA Regulations (40 CFR 15029[c][1]), a federal agency must prepare a revised draft EIS (i.e., a supplement to a draft EIS) if major federal action remains and the federal agency makes substantial changes in the proposed action that are relevant to its environmental effects, or there are significant new circumstances or information relevant to the environmental concerns that bear on the proposed action or its impacts. CEQ recommends that supplementation is not necessary every time new information comes to light, but rather if new information is of value to the still pending decision-making process. Thus, a supplemental EIS must be prepared if the new information is sufficient to show that the remaining action will affect the quality of the human environment in a significant manner or to a significant extent not already considered.

In December 2008, to best integrate and satisfy its NEPA and NHPA obligations, the Trust did in fact prepare a supplement to the June 2008 draft SEIS for the Main Post Update to address a preferred alternative. The supplement identified and discussed the environmental impacts of a preferred alternative that combined elements of alternatives previously analyzed in the draft SEIS. The supplement to the draft SEIS was circulated for comment on March 6, 2009, along with a revised Main Post Update and a revised draft FOE. Three public meetings, including

one before the Trust board of directors meeting, were held on the draft documents.

In July 2009, the proponent for the contemporary art museum (CAMP) discontinued its effort to build the museum at the Main Post. Following the proponent's decision, in April 2010, the Trust identified (via Resolution 10-19) a mitigated preferred alternative, which did not include the CAMP and which contemplated other changes in response to public comment on the supplement to the draft SEIS and feedback obtained through the Section 106 consultation. These changes included modifying the proposals for the Presidio Theatre and Presidio Chapel to better preserve the buildings' historic character; reducing the amount of new construction for the Presidio Lodge to reflect the scale and footprint of barracks previously located on the site; and reducing the overall amount of square footage at the Main Post, resulting in less development (maximum building area) than previously foreseen in the PTMP. The intent of these changes was to avoid, minimize, or mitigate adverse effects on the NHLD as well as to respond to most of the concerns raised by members of the public during review of the supplement to the draft SEIS. In July 2010, the Trust finalized (via Board Resolution 10-28) the mitigated preferred alternative following further consultation under Section 106.

In addition to the CEQ NEPA Regulations, CEQ has issued a variety of general guidance memoranda that concern the implementation of NEPA. One of the more frequently cited and used resources for NEPA practice that federal agencies look to in interpreting the treatment of alternatives under NEPA is CEQ's Forty Most Asked Questions Concerning CEQ's NEPA Regulations (Forty Questions). In Forty Questions No. 29b, CEQ advises if an alternative previously considered in a draft SEIS (in this

case, the preferred alternative in the supplement to the draft SEIS) is modified somewhat to achieve certain mitigation benefits, or for other reasons, the agency need not issue a supplement to the draft SEIS but rather should include a discussion of it in the *final SEIS* (emphasis added). CEQ further advises if the new alternative is a minor variation of one of the alternatives discussed in the draft SEIS (the 2002 PTMP alternative or Alternative 1), but the variation was not given any previous consideration, the agency should develop and evaluate the new alternative in the *final SEIS* (emphasis added). Both of these situations apply to the mitigated preferred alternative (Alternative 2 in the final SEIS) as shown in the comparison in Table 8. The comparison shows that the key difference between the 2002 PTMP alternative and the mitigated preferred alternative is increased public use. The 2002 PTMP alternative provided for more office and residential uses in the Main Post than the Main Post Update. The mitigated preferred alternative reduces the amount of building square footage allocated to those uses and increases the amount of space for cultural, educational, and public serving uses. For example, the new construction identified in the 2002 PTMP alternative for office use is now proposed in the mitigated preferred alternative for lodging (as previously analyzed in the

supplement and again in the final SEIS). The mitigated preferred alternative also identifies additional square footage dedicated to the Presidio's heritage and calls for a more open site and reduced parking at El Presidio. The "red-lined" PTMP Main Post chapter of the Main Post Update that amends the Main Post chapter in PTMP also shows that changes to the original PTMP text are indeed few and results in no new significant environmental impacts that were not previously analyzed in the draft SEIS or supplement. Thus, while circumstances have changed somewhat and new information has been provided, the conclusions of the NEPA analyses in the draft SEIS have not been substantially altered.

Because the mitigated preferred alternative only modifies the preferred alternative discussed in the supplement to further mitigate adverse effects on the NHL, does not differ substantially from the alternative described in the 2002 PTMP, and qualitatively lies within the spectrum of alternatives previously discussed in the draft SEIS and supplement, the Trust believes there is no need or requirement to circulate another supplement to the draft SEIS.

8 COMPARISON BETWEEN 2002 PTMP ALTERNATIVE AND MITIGATED PREFERRED ALTERNATIVE

	<i>2002 PTMP Alternative (Alternative 1 in Draft SEIS)</i>	<i>Mitigated Preferred Alternative (Alternative 2 in Final SEIS)</i>	<i>Change</i>
TOTAL BUILDING AREA (sf)	1,240,000	1,201,291	-38,709
TOTAL DEMOLITION (sf)	20,000	94,000 ^a	+74,000
TOTAL NEW CONSTRUCTION (sf)	110,000	146,500	+36,500
LAND USES (sf)			
Office	570,151	409,505	-160,646
Retail	49,685	34,006	-15,679
Restaurant	– Did Not Specify –	24,336	–
Lodging	26,830	91,830	+65,000
Conference	24,115 ^b	25,537	+1,422
Recreation ^c	51,847	21,067	-30,780
Cultural/Educational	233,765	327,010	+93,245
Theater	– Did Not Specify –	33,140	–
Residential	246,703	176,312	-70,391
Infrastructure	38,765	58,548	+19,783
SPECIFIC BUILDING USES/PROJECTS			
El Presidio	Excavation	Commemoration (including potential removal or relocation of Buildings 40 and 41)	
Officers' Club	Special Events	Heritage Center/Special Events	
Buildings 44, 47, 48, and 49	Office/Storage Use	Archaeology Lab	
Building 93	Bowling Center	Park Programs/Visitor Services	
Building 97	Office Use	Park Programs/Visitor Services	
Building 99	Cultural Use	Film Arts/Performing Arts Center	
Buildings 101, 103, and 105	Office Use	Mixed Use (office, cultural/educational, and retail)	
Lodging	Pershing Hall, Funston Street	Pershing Hall, Graham Street Corridor	
Parking ^d	Housing		
	2,000 Surface Spaces	1,910 Spaces (including up to 350 parking spaces below grade)	

^a Includes 32,259 square feet to be demolished as part of the Doyle Drive project that was analyzed subsequent to completion of the PTMP.

^b Golden Gate Club (Building 135).

^c Does not include ball field.

^d Excludes Infantry Terrace.

sf = square feet

23 The SEIS Must Present a Coherent Exposition That Is Reasonably Understandable By the Public

Dimensions not being available and lack of detail on the design and dimensions of the Anza Promenade/Main Parade structures and paving and the paving of Pershing Square, and the ambiguity and confusion about the proposed design of the art museum are bewildering to the public, contrary to NEPA standards for an EIS.

Response While the Trust appreciates the opinion expressed in this comment, it should be noted that many reviewers of the draft SEIS and supplement, including those involved in the Section 106 consultation process under the NHPA and the U.S. Environmental Protection Agency,¹¹ did not share this concern and were able to use the documents with sufficient ease to provide the Trust with insightful and constructive comments. These specific comments have been responded to in the final SEIS, which also includes a number of changes to graphics and the text designed to make the information more easily accessible to even casual readers. For example, the discussion in Section 2 Alternatives more clearly presents shared projects and improvements among the alternatives, as well as differing features. Separate graphics and tables have been prepared for each alternative to better illustrate proposed

¹¹ *The U.S. Environmental Protection Agency (EPA), which is charged with reviewing Draft EISs prepared by other federal agencies and rating them using a rating system that provides a basis upon which the EPA makes recommendations to the lead agency for improving the document, awarded the draft SEIS its highest rating (Lack of Objections or LO). In its comment letter on the supplement, the EPA made minor suggestions, including incorporating the programmatic agreement (PA) into the final SEIS and addressing “some concerns” regarding air quality matters, which the Trust took into account in preparing the final SEIS.*

changes for new construction, demolition, and circulation. In Section 3 Affected Environment and Environmental Consequences, the alternatives are treated equally for a more comparative analysis of potential impacts. Additional and more detailed renderings (photosimulations) of key projects have been provided in Section 3.8 Visual Resources to better aid in reviewers’ understanding of visual impacts. Also, where additional information was specifically requested by reviewers, this has been provided; and where specific comments or questions were posed regarding potential impacts or associated mitigation measures, these have been addressed individually in this volume of the final SEIS.

24 The Main Post Update Is Subject to CEQA

The Main Post Update would have impacts on roadways and neighborhoods outside of the Presidio. While mitigations are offered for impacts outside of the Presidio, the SEIS does not fully analyze the impacts of these mitigations. As has been done for the Doyle Drive project, a California Environmental Quality Act (CEQA) analysis should be performed to fully identify impacts and mitigations of proposed actions outside of the Presidio. The mitigations from the Doyle Drive project should be reviewed, analyzed, and incorporated, where appropriate, within the SEIS.

Response The Main Post Update is not subject to CEQA. The Main Post Update is a planning document proposed for implementation by a single federal agency, the Presidio Trust. Federal actions are subject to the NEPA. The impacts to roadways outside the Presidio that could occur should the City and County of San Francisco be reluctant to implement Trust-identified mitigation measures are fully disclosed and analyzed in Section 3.3 Transportation and Parking as required by the NEPA. In the

case of the Doyle Drive project, the Federal Highway Administration, the California Department of Transportation, and the San Francisco County Transportation Authority jointly proposed to improve the seismic, structural, and traffic safety along Doyle Drive. In that case, a combined NEPA and CEQA document was developed (in accordance with CEQA Guidelines, Sections 15220-15229). Impacts from the Doyle Drive project, including proposed mitigation measures, have been analyzed as a cumulative action in Section 3.12 Cumulative Impacts of the final SEIS.

25 The Final SEIS Should Provide More Detailed Information on Implementation and Funding of Possible Mitigations

The NEPA requires that an EIS disclose adverse environmental effects that cannot be avoided should the proposal be implemented. But an agency will not know if an adverse effect can be avoided unless it has investigated whether it can be avoided. Throughout the draft SEIS, adverse impacts of the proposed action are identified, but there is no indication that the possibility of mitigation has been investigated and determined. Also, if mitigation implementation or anticipated success is questionable (e.g., because of the need for another entity to implement the mitigation or because funding is uncertain), this should be noted and discussed in the final SEIS.

Response At the end of each resource section in Section 3 Affected Environment and Environmental Consequences (for example, Section 3.7 Archaeology), in both the draft and final SEIS, mitigation measures were identified and discussed. As allowed by the Council on Environmental Quality (CEQ) (see Forty Questions Number 19(b)), and as has been Trust practice in all its EISs to date, mitigation measures will be outlined in the Record of Decision (ROD) for the project. As part of the decision to implement the selected alternative, the Trust will adopt a monitoring

and enforcement program (MEP) for each mitigation measure to monitor impacts during implementation of the Main Post Update as recommended in CEQ's draft Guidance for NEPA Mitigation and Monitoring, dated February 18, 2010. The MEP will provide for the implementation of the mitigation measures as proposed in the final SEIS, where these measures are within the ability of the Trust to implement. Where measures fall outside of the Trust's jurisdiction, this fact will be noted, along with a description of ways in which the Trust will assist and encourage other agencies to implement these measures. Should the outside agency express concern regarding the likelihood that measures will be adopted, this too will be noted in the ROD.

The City and County of San Francisco (CCSF) has indicated that it may not have funds to signalize intersections under its jurisdiction if and when needed. Under the NEPA, the Trust is not obligated to provide certainty that the CCSF would fund traffic measures, but rather is only required to notify the local agency to implement the measure and encourage it to do so. The Trust will coordinate with the CCSF to determine the contribution of each party to the cost of the traffic improvements at the appropriate time.

26 The Main Parade EA Was Improperly Adopted

The environmental assessment (EA) for the Main Parade was improperly adopted and the findings of that document should be rejected. It is improper for the draft SEIS to rely on the EA when it did not take into consideration the large-scale, massive development of the Main Parade subsequently presented in the Main Post Update.

Response The EA for the Main Parade did include actions that would be analyzed further in the Main Post Update SEIS (such as a lodge at the Building 34 site and a museum at the southern end of the Main Parade)

in its cumulative impacts analysis (Main Parade EA, pages 58-68). The Main Parade project is considered part of the “baseline” analyzed under Alternative 1 in the final SEIS. Table 9 outlines the public process undertaken by the Trust prior to the signing of the Finding of No

Significant Impact (FONSI) for the Main Parade EA and documents NEPA and NHPA compliance.

9 OUTLINE OF PUBLIC PROCESS UNDER SECTION 106 (NHPA) AND NEPA FOR THE MAIN PARADE, JANUARY 2004 – NOVEMBER 2007

<i>Date</i>	<i>Action</i>
January 13, 2004	Public Workshop 1: Main Parade Ground Public Use and Programming
January 28, 2004	Public Workshop 2: Main Parade Ground Design Concepts
March 30, 2004	Public Workshop 3: Main Parade Conceptual Design
September 22, 2004	Public Workshop 4: Main Parade Ground Context, Historic Character and Public Use
October 25, 2004	Public Workshop 5: Main Parade Ground Revised Design Concepts
March 18, 2005	Notice issued to Initiate Public Scoping and Prepare an Environmental Assessment (EA) for Proposed Improvement to the Main Parade Ground at the Presidio of San Francisco; 75-day comment period begins
March 24, 2005	Initiation of Section 106 Consultation; consultation packages including Area of Potential Effect (APE) and copy of Request for Qualifications (RFQ) for design services, Main Post Cultural Landscape Assessment (CLA) mailed to all signatory parties
April 19, 2005	Comments received from Fort Point and Presidio Historical Association (FPPHA) requesting expansion of APE
April 19, 2005	Consultation meeting held with State Historic Preservation Officer (SHPO) (John Thomas, Mike McGuirt, Steve Mikesell), NPS (Ric Borjes), and Trust (Juli Polanco, Kathleen Forest); Advisory Council on Historic Preservation (ACHP) declined to participate, but agreed that meeting was appropriate. Result: expansion of APE to address FPPHA’s concerns
May 23, 2005	Public Scoping Workshop held updating public on the project; FPPHA provides verbal comments on proposal expressing concern over cumulative effects, NEPA process, transit and parking
May 27, 2005	California Heritage Council submits comment letter concurring with FPPHA comments and questioning various elements of new construction as part of the Main Parade project
May 31, 2005	Close of public scoping period
May 31, 2005	FPPHA submits comment letter summarizing its verbal comments from the 5/23 public meeting
June 3, 2005	National Park Service (NPS) submits comment letter expressing support for the revival of the Main Parade, but encouraging rehabilitation of historic buildings over new construction
August 24, 2005	Trust meeting with FPPHA to update on progress with Olin Partnership designs
October 12, 2005	Trust meeting with SHPO to update on 106 consultation around Main Post area, including Main Parade

9 OUTLINE OF PUBLIC PROCESS UNDER SECTION 106 (NHPA) AND NEPA FOR THE MAIN PARADE, JANUARY 2004 – NOVEMBER 2007

<i>Date</i>	<i>Action</i>
January 27, 2006	Trust phone call with SHPO (Steve Mikesell) to clarify points on Main Parade project
August 17, 2006	Trust meeting with SF Architectural Heritage (Charles Chase) to review Main Post projects, including Main Parade
September 7, 2006	Trust meeting with FPPHA board to present Main Post projects, including Main Parade
September 22, 2006	Letter received from FPPHA commenting on historic timeline, interpretive planning details from Guillin & Merrell proposal
October 30, 2006	Public Workshop 6: Main Parade Ground Update
December 15, 2006	Trust meeting with National Trust for Historic Preservation to present update on Main Post projects, including Main Parade
December 20, 2006	Members of FPPHA board meet with Trust to discuss interpretive plan, offer suggestions on further research ^a
January 11, 2007	Trust presents latest “Anza Esplanade” plans to FPPHA at the organization’s board meeting, receives comments on design and interpretive information ^a
July 2, 2007	Main Parade EA released, 30-day review period begins
August 2, 2007	30-day review period closes
August 13, 2007	Email from SHPO (Amanda Blosser) to Trust indicating no comments or revisions to Main Parade EA
September 7, 2007	Comment letter received from National Trust for Historic Preservation (NTHP) on the Main Parade EA
October 16, 2007	Comment letter received from NPS on the Main Parade EA ^b
November 2, 2007	Final EA and Finding of No Significant Impact (FONSI) released by Presidio Trust

^a Meetings to discuss historical interpretation in the Main Post began in response to comments made by the public during the NEPA/NHPA processes. As stated in the EA, the Trust wholly intends to develop historical interpretation in conjunction with the Main Parade project. To that purpose, the EA states the Trust’s intention to continue discussions with history organizations and individuals to develop the interpretive themes of the Anza Esplanade.

^b Comments from this letter have informed the latest design developments, which have been incorporated into the analysis in the final SEIS.

27 The Trust Is Obligated to Work with Other Government Agencies

Under the NEPA, the Trust may not take actions that are entirely in opposition to local/federal government policies. It is the policy of San Francisco to disapprove those major developments that create undue demands for new transit services. NPS policy is to discourage vehicle use in national parks.

Response The NEPA requires the Trust to discuss possible conflicts between a proposed action or alternative and the objectives of land use plans, policies, and controls for the area concerned. This discussion is provided in Section 3.2 Land Use Plans and Policies of the final SEIS. The site is located on the Main Post in Area B of the Presidio, which is under the administrative jurisdiction of the Presidio Trust; Trust policies and regulations are controlling. Additionally, the Presidio is an area of exclusive federal jurisdiction within the City and County of San Francisco (CCSF), and local land use plans, policies, and regulations are inapplicable. Nevertheless, the SEIS describes the San Francisco General Plan, specifically the policy of the Recreation and Open Space Element that calls for preservation of the Presidio and its resources, and its associated guidelines. It should be noted that it is also the Trust's policy to minimize private automobile use within the park, and that the proposed action is consistent with this policy. Refer to pages 46 through 51 of the PTMP for background on the Trust's transportation policies.

Throughout the Main Post Update NEPA process, the Trust has fostered an open relationship with the CCSF, the NPS, and other public agencies. Federal, state, and local agencies that were consulted during the NEPA process are outlined in Section 5.2 List of Persons Consulted of the final SEIS. Comments received from the NPS, CCSF, and other public

agencies were incorporated into the final SEIS. The Trust will continue to work with the CCSF and NPS to achieve mutual goals and to minimize possible conflicts between Trust activities and CCSF and NPS policies.

2.4 NHPA PROCESS

28 The NEPA and NHPA Processes are Neither Concurrent nor Integrated

The applicable regulations require that the two processes (NHPA and NEPA) be "concurrent and integrated." That guidance requires that those concurrent and integrated measures be taken before proceeding with NHPA tasks alone. Failure to do so would undermine both processes and would lead to a misinformed agency decision.

Response The Section 106 regulations encourage federal agencies to coordinate their Section 106 process with their NEPA environmental review process. Through coordination and sharing of information and analyses, compliance can be completed in a streamlined fashion that minimizes duplication of effort. This coordination also ensures historic properties receive adequate and timely consideration at the beginning of and throughout the planning process.

Concurrently with the NEPA environmental analyses in the SEIS, the Trust also provided for the review of the proposals within the Main Post Update under the consultation process required by Section 106. This process identified the historic resources that may be affected by an undertaking, assessed the effects on historic resources through a Finding of Effect (FOE), and then looked for ways to "avoid, minimize, or mitigate" the effects identified in the FOE. The final FOE was circulated on July 1, 2009. Section 106 consultation included the National Park

Service, the State Historic Preservation Officer, the Advisory Council on Historic Preservation, and 14 other consulting groups. Table 10 shows the process for coordinating the NEPA and NHPA as explained by draft guidance provided by the Council on Environmental Quality (CEQ) (first two columns of table), and documents compliance steps taken by the Trust (third column).

The draft guidance recognizes that any discussion of coordination between the NEPA and NHPA processes must acknowledge the distinctions between the purposes of Section 106 and NEPA. For instance, where NEPA calls for public disclosure and focuses on alternatives, Section 106 requires a consultative process and focuses on resolving adverse effects to historic properties. NEPA has a closed timeframe in which the process operates, which may not allow adequate time for meaningful Section 106 consultation. Section 106 allows for

consultation to be open-ended that continues well past time periods specified for comment under NEPA, as has been the case for the Main Post Update. The guidance also advises that solicitation of public comments under NEPA should not be confused with Section 106 consultation. All the same, for the Main Post Update, detailed consideration of historic properties and preservation concerns that emerged from the Section 106 analysis greatly benefited the shaping and analysis of alternatives under NEPA. The NEPA process for the Main Post Update will conclude in a record of decision (ROD) that will fully account for the provisions of the signed PA-MPU that concluded the NHPA process. A copy of the signed PA-MPU is provided in Appendix B of the final SEIS.

10 COORDINATING THE NATIONAL ENVIRONMENTAL POLICY ACT WITH THE NATIONAL HISTORIC PRESERVATION ACT FOR THE MAIN POST UPDATE

<i>NEPA Guidance</i>	<i>NHPA Section 106 Guidance</i>	<i>Presidio Trust Compliance Steps</i>
STEPS TAKEN TO DATE		
1 Identify project objectives and scope	Establish “undertaking” <ul style="list-style-type: none"> • Notify appropriate SHPO • Plan to involve the public • Identify other consulting parties 	Notice of Intent sent to consulting parties (ACHP, SHPO, NPS, NTHP, PHA), October 23, 2007 NEPA scoping initiated with Notice of Intent, October 29, 2007

<i>NEPA Guidance</i>	<i>NHPA Section 106 Guidance</i>	<i>Presidio Trust Compliance Steps</i>
2	<u>Finding</u> <ul style="list-style-type: none"> • Undertaking is type that might affect historic properties; or • Project is covered by an existing PA 	Section 106 consultation package sent to ACHP, SHPO, NPS, NTHP, and PHA, November 11, 2007
3 Identify social, economic, and environmental constraints	Through consultation: <ul style="list-style-type: none"> • Identify historic properties • Evaluate historic significance • Resolve eligibility disputes 	NEPA scoping continues; public meeting November 28, 2007 1 st Section 106 consultation meeting, December 11, 2007 Scoping ends December 15, 2007
4	<u>Finding</u> <ul style="list-style-type: none"> • Historic properties affected Time to resolve disputes/objections early in the process, in consultation with SHPO and other consulting parties	2 nd consultation package sent to consulting parties, January 28, 2008 2 nd consultation meeting, February 26, 2008
5 Develop preliminary alternatives		Alternatives, including publicly-suggested Alternative 2A, developed
6 Analyze the impacts of the alternatives	Through consultation, assess adverse effects by applying Criteria of Adverse Effect	Draft SEIS prepared Draft FOE prepared
7	<u>Finding</u> <ul style="list-style-type: none"> • Adverse effects Time to resolve disputes/objections	3 rd consultation package mailed to consulting parties, March 18, 2008

<i>NEPA Guidance</i>	<i>NHPA Section 106 Guidance</i>	<i>Presidio Trust Compliance Steps</i>
8 Incorporate alternatives analysis in the NEPA document, and circulate document for comment	Through consultation, consider comments and negotiate mitigation measures	<p>Draft SEIS available for comment, June 13, 2008</p> <p>Public tours, June, July, August 2008</p> <p>1st Public Trust Board of Directors (Board) meeting, July 14, 2008</p> <p>Public Transportation Workshop, July 28, 2008</p> <p>Draft FOE available for comment, August 8, 2008</p> <p>3rd consultation meeting, September 16, 2008</p> <p>Alternatives Workshops, September 25, September 28, October 2, 2008</p> <p>Public meeting on Conforming New Construction, November 19, 2008</p>
9 Incorporate comments into the identification of a preferred alternative	<p>“Avoid, minimize, mitigate” adverse effects through additional consultation and pursue:</p> <ul style="list-style-type: none"> • MOA • PA • Other program alternative <p>Time to resolve disputes/objections</p>	<p>Identification of Preferred Alternative, December 5, 2008</p> <p>4th Section 106 consultation meeting, December 5, 2008</p> <p>2nd Public Board meeting, December 9, 2008</p> <p>Supplemental draft SEIS and revised draft FOE available for comment, February 2009</p> <p>5th Section 106 consultation meetings, April 21-22, 2009</p> <p>Public comment on all draft documents extended through June 1, 2009, 90 days after release of supplemental draft SEIS/revised draft FOE</p> <p>Release of final FOE, July 1, 2009</p> <p>6th Section 106 consultation meetings, August 18-20, 2009</p> <p>Release of first draft PA-MPU, November 17, 2009</p> <p>7th Section 106 consultation meeting, January 26, 2010</p> <p>Release of second draft PA-MPU, March 16, 2010</p>

*NEPA Guidance**NHPA Section 106 Guidance**Presidio Trust Compliance Steps*

Release of third draft PA-MPU, August 13, 2010

8th Section 106 consultation meeting to review draft PA-MPU, September 14-15, 2010

Release of final, executed PA-MPU, November 2010

Release of final SEIS for public review, November 2010

NEXT STEPS

10 Issue FONSI/ROD

File final PA with signatory and consulting parties; include copy in FONSI/ROD

Adopt ROD for public review

29 The Final SEIS Should not Be Prepared Until the PA Is Signed

Because the NHPA Section 213 report was not available when the supplement was produced, the supplement does not fully address the cumulative effects of the proposed project on historic resources. The NHPA Section 213 report finds that the proposed undertaking would have a significant irreversible adverse effect on the Presidio NHL. The revised draft FOE finds no direct adverse effect to the NHL. The Trust and NPS documents are in direct conflict. The Trust is working with a number of signatory and concurring parties to develop a programmatic agreement (PA) to avoid, minimize, or mitigate adverse effects of the project on the NHL. This process may result in further changes to the proposed project. Furthermore, it appears that much of the information that should be included in the final SEIS will be addressed in, or determined by, the PA. For these reasons, the final EIS should not be

prepared until the PA is signed, and the PA should be included as an appendix in the final SEIS.

Response Analysis contained in the Section 213 report has been incorporated into the final SEIS. In February 2009, the Trust released a revised draft Main Post Update, a supplement to the draft SEIS for the Main Post, and a draft Finding of Effect (FOE) for the Main Post Update. Overall, the Trust's February 2009 draft FOE and the April 2009 NPS Section 213 report arrived at very similar conclusions. Both documents determined that the preferred alternative as detailed in the February 2009 Main Post Update would diminish the integrity of individual resources within the Presidio and would result in a cumulative adverse effect to the National Historic Landmark District. The analysis from the 2009 draft FOE is consistent with the analysis contained in the February 2009 supplement to the draft SEIS.

In August 2009, the Trust released the final FOE for the Main Post Update. The Advisory Council on Historic Preservation (ACHP) and the State Historic Preservation Officer (SHPO) concurred with the finding of adverse effect and the proposed projects moved forward to the resolution phase of Section 106 consultation. The proposal for the art museum, however, was withdrawn from further consideration.

As a result of additional NHPA consultation, and in response to comments received throughout the NEPA process, the Trust has now analyzed a mitigated preferred alternative (Alternative 2) that incorporates the majority of the recommendations outlined in the NPS Section 213 report. The Programmatic Agreement for the Main Post Update (PA-MPU) has been attached as Appendix B to the final SEIS and the Record of Decision (ROD) will fully account for the provisions of the Section 106 consultation and the effect of the proposed project on historic properties as described in the PA-MPU.

30 The Proposed Action Violates Section 110 of the NHPA

Section 110 of the NHPA requires that the Trust, to the maximum extent feasible, undertake such planning and actions as may be necessary to minimize harm to the NHLD resulting from its undertakings. The draft SEIS acknowledges that demolition of historic buildings in the Main Post would have an adverse effect on historic resources, including the NHLD, and that construction of the CAMP would “diminish the integrity of multiple contributing resources and aspects of the historic scene” and therefore “would have a significant impact on the Main Post and potentially the NHLD.” The draft Finding of Effect concurs.

Response As a result of modifications to the projects outlined in the Main Post Update, including the withdrawal of the art museum proposal,

the amount of demolition proposed in the mitigated preferred alternative has been greatly reduced from that initially proposed as part of Alternative 2. Likewise, through the Section 106 consultation process, impacts on the NHLD have been avoided, minimized, or in some cases mitigated.

The integrity of the Landmark is extremely important to the Trust. As outlined in ACHP guidance, the review required by Section 110(f) is similar to that required by Section 106 but involves a higher standard of care. The Trust has met the procedural requirements of Section 110(f) of the National Historic Preservation Act via a thorough Section 106 consultation process that has included the following additional steps: engaging the ACHP in consultation to resolve adverse effects, noticing the Secretary of the Interior to provide an opportunity to participate, and the ACHP’s reporting the outcome of the process to the Secretary of the Interior. The ACHP has “indicated [by signing the PA-MPU] its concurrence in the actions taken by the Presidio Trust to meet its Section 110(f) obligations.”

31 There Has Been Incomplete or Inadequate Consultation with Interested Parties

NHPA regulations require a Federal agency to grant consultative roles to Native American groups and “individuals and organizations with a demonstrated interest in the undertaking... due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking’s effects on historic properties.” The proposed action is likely to adversely affect significant prehistoric and historic archaeological resources that are important to the heritage of contemporary Native Californians. There is no indication in the draft

SEIS that Native American Heritage Council, Ohlone and Miwok tribal groups, or interested individuals were consulted during the scoping and production of the draft SEIS.

Response The Trust has engaged with a diverse group of individuals and organizations possessing a “demonstrated interest in the undertaking” from the beginning of the Section 106 consultation process. Those parties, numbering 17 in all, include neighborhood groups, historic preservation and natural resource advocacy organizations, a professional archaeologist, project proponents and a group representing descendants of the Presidio’s Spanish founders. Additionally, the Trust consulted with representatives of Native American groups identified by the California Native American Heritage Commission as having knowledge of cultural resources in the project area and the City and County of San Francisco, and has incorporated comments from that consultation into the final SEIS and the PA-MPU (Appendix B of the final SEIS). The list of parties consulted outlined in the final SEIS has been updated to reflect the identified Native American groups.

32 The Trust Has Not Coordinated the NEPA and NHPA Processes

The Trust’s revised draft Finding of Effect (FOE) does not analyze effects of various proposals equally because the projects are not equally developed.

Response While it is true that some of the proposed projects in the Main Post Update are further along in the development process than others, this is common in a Section 106 consultation. As a result, the stipulations in the PA-MPU have been tailored to reflect the current status of each of the proposals, and – where appropriate – additional consultation and/or design review has been described.

33 The Trust Has not Adequately Identified All Historic Properties in the Area of Potential Effect (the Main Post)

The 2008 NHL Update has not been finalized and individual National Register eligibility determinations have not yet been completed for post-1947 buildings in the Main Post. Some of these buildings are included in the Main Post Update for demolition.

Response In February 2008, the Trust initiated an update to its 1993 NHL registration forms, focusing on buildings that had been constructed between 1945-1958. A draft of the document, which included contributing status determinations for all buildings in the Presidio, was submitted to the NPS for review and comment prior to finalization. The NPS informed the Trust that it would not complete its review of the 2008 Update until the Section 106 consultation on the MPU was completed. Since the completion of the draft 2008 Update, the Trust has treated all eligible buildings as contributing to the NHL as historic properties. The PA-MPU includes a process for finalizing all eligibility determinations within three months of its execution, as well as direction on how any newly eligible buildings in the Main Post would be treated.

2.5 PRESIDIO TRUST ACT

34 The Preferred Alternative Conflicts with the Trust’s Stewardship Mandates Under the Presidio Trust Act

The Presidio Trust Act requires that the leasing, rehabilitation, and improvement of properties within the Presidio be in accordance with the purposes for which the Golden Gate National Recreation Area (GGNRA) was established. The GGNRA’s purposes are echoed in the Trust Act, which states that, “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." The Trust Act further directs the Trust to manage the Presidio in accordance with the "general objectives" of the 1994 General Management Plan Amendment (GMPA). Elements of the preferred alternative would not enable the Trust to fulfill these legislative mandates.

Response Congress created the Presidio Trust to preserve and enhance the Presidio as an enduring resource for the American people. The Trust Act as a whole and Section 104, Duties and Authorities of the Trust, in particular, include several legislative obligations to achieve that mission. Among them is a requirement for the Trust to develop a "comprehensive program for management of those lands and facilities within the Presidio which are transferred to the administrative jurisdiction of the Trust" (Trust Act, Section 104(c)). This comprehensive program was developed and adopted as part of the PTMP process and will be revised for the Main Post through the Main Post Update. Both the PTMP and the tiered Main Post Update were drafted "consistent with sound principles of land use planning and management" and in accordance with the purposes set forth in Section 1 of the GGNRA and the general objectives of the GMPA (Statement of General Objectives of the General Management Plan Amendment (GMPA), Presidio Trust Board of Directors Resolution 99-11 ("General Objectives of the GMPA")).

As a result of comments received during the NEPA process and the parallel Section 106 consultation under the National Historic Preservation Act, the Trust modified the original proposed action,

subsequently identified a preferred alternative, and has now analyzed a mitigated preferred alternative (Alternative 2 or Main Post Update). If adopted, the mitigated preferred alternative would "preserve and (where appropriate) enhance the historical, cultural, natural, recreational, and scenic resources" of the Main Post (General Objectives of the GMPA). This would be achieved through three implementation strategies identified in the Main Post Update: 1) reveal the Presidio's history, 2) create a welcoming place, and 3) employ 21st century green practices.

35 The Preferred Alternative Involves More Construction Than Is Authorized in the Presidio Trust Act

The preferred alternative proposes large-scale changes to the Main Post, including significant new construction, which appear to conflict with the Trust Act's legislative mandates. The Trust Act states that new construction must be "limited to replacement of existing structures of similar size in existing areas of development." As with other portions of the Trust Act, this proviso should guide the Trust in its stewardship of the Presidio. The large increase in new construction, in excess of that authorized in the PTMP, conflicts with this provision and requirement of the Trust Act.

Response The mitigated preferred alternative would decrease the maximum building area square footage outlined in the PTMP (by 14,500 square feet) and only slightly increase maximum new construction (by 36,500 square feet) and maximum new demolition (by 50,000 square feet).¹² Like the 2002 PTMP, the Main Post Update incorporates past

¹² 32,259 square feet of the increase in demolition is attributed to the Doyle Drive project.

planning efforts and seeks to “increase open space, consolidate developed space, and provide for appropriate uses of the Presidio, including uses that involve stewardship and sustainability, cross-cultural and international cooperation, community service and restoration, health and science discovery, recreation, the arts, education, research, innovation and/or communication” (Statement of General Objectives of the General Management Plan Amendment (GMPA), Presidio Trust Board of Directors Resolution 99-11, March 4, 1999). These past planning efforts, as well as the final Environmental Impact Statements for the Letterman Complex (March 2000) and the Public Health Service Hospital (May 2006), are consistent with the Trust’s longstanding interpretation and application of Section 104(c) of the Presidio Trust Act as set forth in the PTMP, among other documents.

In keeping with the comprehensive program for the management of Presidio lands and facilities adopted by the Trust as part of the PTMP, aggregate or “banked” square footage of demolished structures (removed on the Main Post or elsewhere on the Presidio) may be used for new construction in existing areas of development, thereby maintaining the overall cap on developed square footage. Aggregate or “banked” square footage was also applied in the 2000 Letterman Complex Record of Decision¹³ (ROD) and the subsequent 2007 Public Health Service

¹³ *The former Letterman Complex contained approximately 1.3 million square feet in 50 buildings with the bulk of that space contained in the 451,000-square-foot Letterman Army Medical Center (LAMC) and 356,000-square-foot Letterman Army Institute of Research (LAIR). Under the selected alternative, the LAMC and LAIR buildings would be demolished and replaced with 900,000 square feet of new construction (2000 Letterman ROD, pages 3-6).*

Hospital ROD,¹⁴ and such use is consistent with past practice by the predecessor federal agencies that managed the area now under the Presidio Trust’s administrative jurisdiction.

As stated in the PTMP, the “new construction may take the form of a building addition, an annex adjacent to an existing building, infill buildings set within an existing building cluster, or stand-alone structures in developed areas to replace square footage removed in that location or elsewhere” (PTMP, page 6). The new construction proposed for the Main Post would not change the park-wide cap of 5.6 million square feet established in the PTMP.

36 The Preferred Alternative Diminishes the Integrity of the NHL, Which Violates the Presidio Trust Act

As a stewardship agency charged with preserving and protecting the Presidio's superlative resources, including its status as a National Historic Landmark District (NHL), the Trust is encouraged to re-evaluate the preferred alternative in light of these mandates. The Trust must “...to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to any National Historic Landmark that may be directly and adversely affected by an undertaking.” There are serious concerns about the amount of change proposed at the Main Post, namely through demolition and new construction, and the subsequent

¹⁴ *As outlined in the 2007 Public Health Service Hospital (PHSH) ROD, Selected Action, up to 133,000 square feet (including the 128,000-square-foot non-historic “wings”) would be demolished and 35,000 square feet of new construction would occur at the back of Building 1801 and 16,000 square feet of new construction at Belles Street on the “central green” (2007 PHSH ROD, page 6).*

level of effect that the preferred alternative would have on the historic integrity of the Main Post. The NPS Section 213 report concluded that the proposed undertaking would have a significant adverse effect on the Presidio NHL and therefore proposed a suite of recommendations that could help avoid or minimize this effect. The Trust should seriously consider those recommendations.

Response Both the Trust's Finding of Effect for the Main Post Update (July 2009) and the NPS Section 213 report determined that the preferred alternative as detailed in the February 2009 Main Post Update would diminish the integrity of individual resources within the Presidio and would result in a cumulative adverse effect on the NHL. Through an ongoing Section 106 consultation process and consistent with the mission of the Trust, the Trust has fulfilled its obligations under the National Historic Preservation Act (NHPA). This includes the more stringent planning mandates of NHPA, Section 110, which states that "Prior to the approval of any Federal undertaking which may directly and adversely affect any National Historic Landmark, the head of the responsible Federal agency shall, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to such landmark..."

The NPS Section 213 report suggested a suite of recommendations that were intended to help avoid or minimize the effects of a plan that included construction of a new museum (CAMP) at the southern end of the Main Parade Ground. As a result of an extensive Section 106 consultation, and comments received during the NEPA process, the art museum proposal was withdrawn in July 2009 and the Trust has further modified the original proposed action, identifying a mitigated preferred

alternative that incorporates the majority of the recommendations outlined in the NPS Section 213 report, including:

- Reducing the proposed square footage of new construction and proposed demolition of historic resources;
- Retaining and rehabilitating Building 97; and
- Reducing the footprint, scale, massing, and height of the proposed lodge.

The mitigated preferred alternative also incorporates measures to ensure that the identified closure and pedestrian use of historic roads would not result in an adverse effect and would avoid the use of traffic lights. The mitigated preferred alternative has been developed to avoid, minimize, or mitigate impacts on historic resources and would protect the status of the Presidio as a NHL.

2.6 ECONOMIC CONSIDERATIONS

37 Financial Information Needs to Be Disclosed

The draft SEIS does not disclose any information on the cost-benefit analysis for any of the alternatives, nor does it share any financial information about the alternatives. This is of concern because of the Presidio Trust mandate to become economically self-sufficient by 2013. It is unclear how each of the alternatives would contribute to fulfilling this financial mandate, and the full costs for each alternative are not disclosed (such as the costs for demolition, construction, buy-out of existing leases, tenant relocation costs, rehabilitation costs for tenant relocation, lost revenues from buildings previously rehabilitated and currently occupied, etc.).

Response The following addresses a number of underlying assertions implicit in the comment: 1) that the financial sustainability mandate is the Trust’s sole mandate and the main driver of the PTMP; 2) that new construction can only be justified on the basis of financial need, narrowly defined, or to facilitate historic rehabilitation; and 3) that the cost of implementing the mitigated preferred alternative would undermine further implementation of the PTMP.

1) In addition to the mandate to become financially self-sufficient, the Trust has also been charged by Congress to transform the historic military post into a national park site, a place that welcomes the public. In order to balance the need for financial stability with the need to create a place for the public, the Trust committed in the PTMP to a balanced use of the Presidio’s square footage: one-third for housing, one-third for office uses, and one third for cultural, education, and public-serving uses. In making this commitment, the Trust recognized that residential and office uses would be the primary sources of revenue to support the park and that the daily activity of the park community would sustain the Presidio’s historic character. The Trust also recognized that the remaining third would not be used primarily for revenue, but for programmatic purposes. Balance was the main driver of the PTMP, and balance among financial sustainability, resources enhancement and protection, and public use continues to be the Trust’s principal guideline.

2) The new construction now included in the mitigated preferred alternative has been reduced in response to changes that have come about as a result of the public review process under the NEPA and NHPA. In fact, the mitigated preferred alternative has less total square footage at the Main Post than was identified in the PTMP. The new construction in the mitigated preferred alternative would allow for rehabilitation of the

historic Presidio Theatre and for accessibility and program upgrades for the historic Presidio Chapel. New construction would also include a lodge, a fundamental visitor-serving use traditionally found in national parks. Providing lodging at the Main Post would help to welcome the public and make rehabilitation and reuse of the remaining historic buildings more feasible. The PTMP assumed new construction at the Main Post for office use, admittedly a more lucrative use, but one that would not contribute to the public character of the Main Post as the “heart of the park.”

Rehabilitation and reuse of historic buildings – not new construction – is still the focus of the mitigated preferred alternative. In addition to rehabilitation and reuse of the Presidio Theatre and Presidio Chapel, the mitigated preferred alternative would allow for reuse of the Officers’ Club both as a Heritage Center and as a special events venue; it provides for the rehabilitation and reuse of the historic garages behind the Officers’ Club as an archaeology lab and curation facility. The mitigated preferred alternative calls for the rehabilitation of the remaining Montgomery Street Barracks buildings for a mix of uses, with public-serving uses on the ground floors, and calls for the rehabilitation of historic Building 42 for lodging.

3) The purpose and need of the action under consideration by the Trust is to re-establish the Main Post as the “heart of the park.” This vision is consistent with the vision for the Main Post presented in the PTMP and does not undermine the Trust’s ability to ensure the financial sustainability of the Presidio and the full implementation of the PTMP.

38 The Contemporary Art Museum Proposal Includes a \$10 Million Charitable Contribution

The financial incentives associated with the art museum proposal include a \$10 million charitable contribution. Use of the charitable contribution would be restricted to rehabilitation of the Main Parade, and given only if the current proposal is approved. The Trust should present to the public the financial impacts of the proposed action, and any conditions placed on financial incentives to the Trust, as the Trust Board will necessarily consider these factors.

Response The proposal to build a museum of contemporary art on the Main Post has been withdrawn and there are no offers of a \$10 million charitable gift to rehabilitate the Main Parade in association with any of the projects in the mitigated preferred alternative, nor are there any offers of funding for the Main Parade from any source at this time.

39 Economics Were Considered but not Included for Public Review

Economic considerations were clearly a major factor driving the identification of the preferred alternative, but the Trust has not responded to numerous questions about the anticipated economic effect of the proposal and has not made this information available to the public.

Response Economic considerations factor into the Trust's decisions but were not the major factor in the identification of the mitigated preferred alternative. The mitigated preferred alternative was chosen because it would achieve the purpose and need to reestablish the Main Post as the "heart of the park." It has changed substantially as a result of the public review process under the NEPA and NHPA; it now represents far less development than initially proposed, and its impacts are within the range of impacts analyzed within the final PTMP EIS.

The Trust's 5-year construction plan and annual budget are presented at an annual budget workshop and are kept up-to-date on the Trust's web site at www.presidio.gov. The Trust's annual report to Congress presents a comprehensive analysis of costs and revenues. The annual report can also be found on the Trust's web site.

40 Revenues and Expenses Associated with the Art Museum are Not Included

The draft SEIS makes a number of generalized statements about how the proposed alternative will serve as a focal point for attracting additional tenants and investors which would directly and indirectly enhance the financial viability of the Presidio. The SEIS should provide any material (studies, other investigations) that would substantiate this hypothesis. Without concrete data about the current financial status of the Presidio or estimated future revenues, this statement is impossible to assess.

Response It is well-recognized that cultural institutions help stimulate local economies by creating destinations for visitors. Parks also improve the local economy. Many studies have demonstrated the multiple values of cultural institutions such as museums. An example can be found at <http://www.vcu.edu/cppweb/urban/aam%2002%20handout.pdf>. Similar studies exist for parks and open space, such as the one found at <http://openspace2100.org/node/39>. The mitigated preferred alternative has changed, however, and no longer includes an art museum on the Main Post.

41 The 2005 Strategic Plan Should be Updated and Provided

The Trust should analyze the financial impact of the preferred alternative on the 2005 Strategic Plan and provide that analysis to the public for review. The analysis should provide an updated financial forecast.

Response The Trust updates its 5-year construction plan every year and presents the plan as well as its overall budget to the public at an annual budget workshop and in its annual report to Congress. The budget, 5-year construction plan, and annual report can be found on the Trust's web site at www.presidio.gov.

42 The Main Post Update Is Predicated in Part on Greening the Main Parade

The Main Post Update is predicated in part on greening the Main Parade, yet the funding for this essential element is left to an uncertain philanthropic effort.

Response Greening the Main Parade has been one of the chief park-making objectives for the Main Post since the Presidio became a national park site. It is not one of the undertakings considered by the Main Post Update, however, but is considered as part of the baseline of completed actions and decisions that the plan builds upon. NEPA and NHPA compliance for the Main Parade project was completed in 2007 before scoping for the Main Post Update began. The Main Parade project will be undertaken as funding becomes available.

43 The Loss of Rental Income from Building 220 is Questionable

Questions are raised regarding the economics of discarding a perfectly usable office structure (Building 34) in order to move the Trust staff into

an existing building (220) and use space that could otherwise bring in rental income.

Response Relocating Trust staff from Building 34 to Building 220 or another building in the Presidio would have an economic impact. The decision is not strictly an economic one, however, but rather is based on the purpose and need to re-establish the Main Post as the "heart of the park" and to enhance the public character and experience of the Main Post. The Trust would relocate staff to allow for construction of a lodge on the site of Building 34. The Building 34 site is one of the few sites in the Main Post that can accommodate a lodge because Building 34 does not contribute to the NHLD and the site is a previously developed site.

44 The Economic Impact of the Lodge on Nearby Commercial Lodging Is of Concern

Federal funds may be used to build some or all of the lodge, which would compete with nearby hotels and inns on Lombard Street and elsewhere.

Response Based on the assumed quality, market orientation, and rate segmentation of the proposed lodge, its impact on the Lombard corridor and Marina District hotel and motel uses would be minimal. The lodge would not compete directly with these other lodging facilities because it would be in a different market segment from those accommodations. Indeed, the reverse may be the case: a signature, destination lodge in the Presidio may bring additional business to the Marina District.

2.7 SUPPLEMENT – GENERAL

45 The Alternatives Analysis in the Supplement Appears to Be Deficient

The supplement does not analyze the information related to the preferred alternative in the context of the broader draft SEIS. With the exception of two summary tables, the preferred alternative is nowhere compared to the other alternatives, nor are its potential environmental impacts analyzed in comparison to the impacts that may stem from the other alternatives.

This does not provide the public and decision makers with enough information to evaluate the comparative merits of the different alternatives. Rather, it suggests that selection of the preferred alternative may be a predetermined outcome, despite the supplement's assurances to the contrary. The preferred alternative needs to be compared to all the other alternatives presented by the draft SEIS, to enable the public to assess the merits of each alternative.

Response In the June 2008 draft SEIS for the Main Post Update, the proposed action was analyzed as Alternative 2. As a result of comments received during the NEPA process and the parallel Section 106 consultation under the National Historic Preservation Act, the Trust modified the initial proposed action and subsequently identified and analyzed a preferred alternative in the February 2009 supplement to the draft SEIS. Based upon further consultation and public outreach, a mitigated preferred alternative has now been analyzed as Alternative 2 in the final SEIS. As opposed to any “predetermined outcome,” each step of this transparent process has resulted in proposed projects and improvements for the Main Post with greatly reduced impacts.

The final SEIS contains a thorough comparison of the mitigated preferred alternative with the other action alternatives – the PTMP

Alternative (Alternative 1) and the History Center Alternative (Alternative 3) – as well as with the Status Quo Alternative (Alternative 4). All of the alternatives have different impacts, as explained in each topic area. For example, Section 3.3 Transportation and Parking demonstrates that each alternative would generate a different number of automobile trips to and from the Main Post.

2.8 PURPOSE AND NEED

46 The Claimed Purpose and Need Is Deficient and has Changed from Requirements for a Contemporary Art Museum to that for the Lodge

The purpose and need of the project is so vague as to give no effective basis for determining the reasonable alternatives. The reason the claimed purpose and need remains so oblique is because it is entirely opportunistic and is not grounded in any objectively determinable purpose and need. The Trust is proposing a radical transformation of the Main Post “in order to take into account several proposals, including the art museum, the lodge, and... expansion of the theater” not previously made. The consequence of the claimed purpose and need being entirely opportunistic is that it is formulated so that only one of the alternatives can fulfill it: the art museum, the lodge, and the theater expansion. The proposed art museum, which was key to a planned cultural center, is now gone. The public is unclear as to what the Trust’s current “purpose and need” might be, in part because the Trust’s original purposes and needs have changed or been withdrawn, and none have been added since. What is needed is a statement of purpose and need that reasonably defines their determinants, and alternatives with timeline and other phased, objectively determinable determinants for the accomplishment of the defined purpose and need.

Response As outlined throughout the duration of the NEPA process for the Main Post Update, the purpose of the Main Post Update is to restore the Main Post as the heart of the Presidio, to update the planning concept for the Main Post district of the Presidio, and to add greater detail to the planning for the Main Post than was possible in the 2002 PTMP. The Main Post Update is needed at this time to take into account several actions that the Trust intends to pursue in order to implement the PTMP vision of the Main Post as the heart of a great urban park. This vision for the Main Post has remained constant since 1994 when the National Park Service stated that the “main post would be the center of visitor activities at the Presidio, and it would offer a variety of programming and interpretation” (final GMPA EIS, page 21). As indicated in the Main Post Update’s “red-line” version of the Main Post district chapter of the PTMP, the Main Post Update simply adds more detail and more current information to this overarching concept. Further, the PTMP predicted the need for just this type of update when it anticipated that the plan must “be able to accommodate inevitable changes” (PTMP, p. vii). The PTMP was adopted as a flexible tool that would allow the Trust “to assess the Plan’s effectiveness on an ongoing basis as individual projects are implemented” (PTMP, page 136). As the PTMP recognized:

At times planning proposals may be considered that are not entirely consistent with the Plan. These proposals will be fully reviewed and considered under the National Environmental Policy Act (NEPA), including all applicable public processes. The final decision on the proposal may constitute a Plan amendment and will be informed by the NEPA public review process for the proposal. The decision amending the Plan will be adopted by resolution of the Presidio Trust Board (PTMP, page 136).

The Trust has followed this outlined review process for the Main Post Update.

47 Objectives In the Statement of Need Require Clarification

A list of objectives for future planning and building decisions at the Main Post is provided. However, it is not clear how this list relates to the Main Post planning concept presented in the PTMP, as neither that concept nor that of any other planning district has specific objectives. The objectives are a mixture of planning principles and policies and other factors, yet some suggest a new interpretation of PTMP planning principles. Also, it is not clear if the Trust intends to adopt revised planning principles for future plans as well. The Trust should clarify if it is proposing to modify the PTMP planning principles as part of the SEIS, and if so, should fully disclose this intent.

Response The Main Post Update has been rewritten to incorporate a “red-line” version of the PTMP chapter for the Main Post district to show clearly how things have changed since 2002, to incorporate decisions that have already been made, and to identify actions that are now being proposed for the Main Post. The “red-line” PTMP chapter for the Main Post in the Main Post Update forms the basis of the mitigated preferred alternative (Alternative 2) analyzed in the final SEIS. If adopted, the “red-line” text would ultimately amend the PTMP for the Main Post district.

48 The Need for Additional Large-Scale Buildings Should Be Clarified

The Trust states in the final PTMP EIS that “the Plan does not propose new construction to provide additional large-scale buildings as venues to host programs, but rather emphasizes rehabilitation and reuse of existing buildings for preferred uses, including program-related uses.” The PTMP did consider museum and lodging uses and identified preferred locations for museum and lodging uses. It is not clear in the SEIS whether the

Trust fully tested and explored the options put forth in the PTMP and as a result of this feasibility testing concluded that construction of "additional large-scale buildings" was needed.

Response The Main Post Update does not propose any additional large-scale buildings, as the contemporary art museum proposal has been withdrawn and the proposed lodge has been reduced in size from what was originally proposed and subdivided into an array of buildings compatible with the Main Post's visual and historic setting. Furthermore, the final SEIS evaluates an array of lodging options, ranging from new construction to rehabilitation of a number of historic buildings, including Pershing Hall (Building 42) and the Upper Funston Avenue Officers' Quarters (Buildings 11-16). As discussed in Section 1 Purpose and Need in the final SEIS, these options are being explored to advance the PTMP vision of making the Main Post a visitor destination befitting a premier national park site.

49 The Need for Presidio-Wide Lodging Should Be Clarified

It is not clear whether the Trust intends to pursue other lodging opportunities in the Crissy Field and Fort Scott districts as identified in the PTMP, which would result in a net increase of square feet allocated to lodging Presidio-wide, or whether the Trust anticipates shifting any of the lodging square footage anticipated for Crissy Field and Fort Scott to the Main Post district.

Response Much of the Presidio has been reserved for those members of the public who are able to rent space to stay at the Presidio on a long-term basis as residents or non-residential tenants. The Trust has also consistently supported the development of accommodations for those members of the public who can only stay and enjoy the Presidio on a

short-term basis as lodgers. As outlined in the final SEIS, the purpose of the Main Post Update includes re-establishing the Main Post as the heart of the Presidio. As an amendment to the Main Post district chapter of the PTMP, the Main Post Update would only change the land use preferences for the Main Post. The land use preferences outlined for other districts in the Presidio remain the same.

50 The Lodge Is not Financially "Ripe" and Constrains the Ability of the Trust to Consider Using New Square Footage for Other Projects such as the Visitor Center

The Trust does not have an active proponent for the lodge project, and financial terms do not appear to favor the construction of a lodge at this time. The lodge would account for up to 70,000 square feet of new construction, which leaves little new square footage available for constructing new history or visitor-serving facilities. The Visitor Center study should be completed before making a commitment to a large amount of new construction for a lodge.

Response The MPU is a long-range planning document, and the lodge is a key component of meeting its purpose and need. The Trust has identified the lodge as supporting the MPU's purpose and need to "restore the Main Post as the heart of the Presidio" by providing overnight accommodation to visitors within the park's boundaries, and supporting a round-the-clock vibrancy of the district that existed when hundreds of soldiers resided there each night. It is important to analyze the impacts of the project in the broader context of the district-wide plan. The MPU came about in response to requests from the public (including consulting parties) to analyze all projects in the Main Post together so that cumulative impacts could be understood. Eliminating the lodge from the analysis at this point would be contrary to this effort. This

analysis needs to be undertaken regardless of the current economics of the project. The MPU assumes that the Visitor Center would be in Building 102; should that change, the appropriate analysis would be undertaken.

2.9 ALTERNATIVES

51 All Reasonable Alternatives Should Be Addressed

Each alternative should consider an incremental approach: a phasing in over time of the various components of the alternatives so that the extent to which the purpose has been satisfied can be assessed. Evaluation of this set of alternatives would make some evident as more favorable than others, both in terms of avoiding or mitigating adverse environmental consequences and, by allowing for an expanded time line, increasing the opportunity to fund various alternatives. The alternatives as stated in the SEIS foreclose this type of analysis because they are not formulated as time-phased/interim goal achievement assessed/longer-term funding (and therefore more financially feasible) alternatives.

Response The final SEIS for the Main Post Update assumes that the Trust would implement the mitigated preferred alternative over time and analyzes impacts in 2030 when implementation is forecast to be completed. The Main Post Update affords the Trust important flexibility in managing its resources for the long term. Time-phasing of alternative components could result in an infinite number of possible alternatives. While the Trust must rigorously explore and objectively evaluate all reasonable alternatives, the U.S. Supreme Court has stated that an agency “need not include every alternative device and thought conceived by

man.” Based on the nature of the proposed action, the Trust has analyzed a reasonable range of alternatives.

52 The Art Museum at the Commissary Site Should Be More Fully Explored

The Commissary site was not fully explored and tested to the same level of detail as the Main Post site at the southern end of the Main Parade. The figure for the art museum should illustrate what it would look like as a museum rather than simply showing a photograph of the current building. Since the PTMP is the Trust's adopted land use management plan, the viability of the Commissary site for the art museum should have been considered more seriously. Also, the SEIS does not explore or consider the option of the Commissary's demolition and compatible replacement construction as another option included in the PTMP.

Response The proposal for the art museum has been withdrawn and is not included in the mitigated preferred alternative.

53 The Total Size of the Art Museum Is Unclear

There appears to be some confusion about the total amount of new construction that the proposed new buildings would entail. The museum is stated to be 75,000 square feet above ground and 35,000 square feet underground parking, for a total of 110,000 square feet. Total new construction for the museum is listed as 99,860 square feet plus exterior uses for plaza and terraces in the amount of 21,661 square feet, for a total of 121,521 square feet. The draft SEIS is unclear whether the 35,000-square-foot garage is in addition to the 121,521 square feet for a total of 156,521 square feet. The draft SEIS should clarify the complete and total size of the proposed museum, including plaza area and garage.

Response The proposal for the art museum has been withdrawn. The final EIS explains how square footage is calculated, but underground garage space is typically not included in the square footage of buildings; rather, only “inhabitable” space is considered in square footage calculations.

54 There Is Insufficient Information to Assess the Art Museum in Alternative 2A

Regarding the art museum and Alternative 2A, details are not provided on the size, configuration, or location at Infantry Terrace under this alternative. The total square footage is absent. It is not possible to assess the impact of Alternative 2A without detail approximating that provided for Alternative 2.

Response In the draft SEIS for the Main Post Update, Alternative 2 was analyzed as the proposed action. Alternative 2A was an “option” under Alternative 2 developed in part to respond to several comments received during scoping for the SEIS. As a result of additional comments received during the NEPA process and the parallel Section 106 consultation under the National Historic Preservation Act, the Trust modified the initial proposed action and subsequently identified preferred alternative and has now analyzed a mitigated preferred alternative. As such, the original Alternatives 2 and 2A have not been carried forward for further analysis.

55 Alternatives for the Art Museum Should Be Evaluated

There has been an inadequate consideration of alternative sites outside of the Presidio for the art museum. There is no analysis of how and/or why the San Francisco Museum of Modern Art (MOMA) would not have

supported “the proponent’s key objective for public viewing and appreciation.” The museum should be located in downtown San Francisco or along the waterfront, areas that are more accessible to visitors and residents, more convenient to high-capacity transit, and more financially beneficial to the city.

Response The range of alternatives analyzed in the SEIS for the Main Post Update was formulated to respond to the identified purpose and need of re-establishing the Main Post as the “heart of the park.” Alternative locations outside the Presidio were not analyzed as they would not meet the purpose and need of adding vitality to the Main Post district. Additionally, the proposal for the art museum has been withdrawn.

56 Alternatives for the Presidio Lodge Should Be Considered to Protect Park and Landmark Values

Lodging should be located within existing historic Main Post buildings, such as the Montgomery Street Barracks, and/or amended with the addition of small-scale, freestanding, new lodging along the eastern edge of the Main Parade in a manner that respects the historic scale and setting of the Main Post. Alternative uses for the lodge site should be considered as well as alternative sites for the lodge, including sites outside the Main Post, where construction would not destroy park and landmark values now found in the Main Post.

Response The July 2009 final FOE determined that the lodge would adversely affect historic properties in the Presidio NHL. Through consultation, the adverse effects were resolved through several avoidance, minimization and mitigation measures, including reduction of

the size and scale of new construction, design review, and the development of archaeological treatment measures.

Notwithstanding the resolution of adverse effect, the final SEIS analyzes a hotel in the historic Pershing Hall (Building 42) and bed & breakfasts in the historic Upper Funston Avenue Officers' Quarters (Buildings 11-16). The SEIS also analyzes lodging in rehabilitated historic Buildings 86 and 87 as part of construction of the Presidio Lodge (under Alternative 2). Alternative uses for the lodge site analyzed in the final SEIS include new construction of a 50,000-square-foot office building (under Alternative 1) and continued use of the approximately 32,000-square-foot existing building (Building 34) at the site for office (under Alternatives 3 and 4).

The range of alternatives analyzed in the SEIS for the lodge was formulated to respond to the identified purpose and need of re-establishing the Main Post as the "heart of the park." Alternative sites for the lodge outside the Main Post, including Stilwell Hall at Crissy Field, were analyzed in the final PTMP EIS and not again for the Main Post Update as they would not meet the purpose and need of adding vitality to the Main Post district.

The Trust issued an RFP for lodging in 2007 and found through the lack of responses that lodging was not feasible in the Montgomery Street Barracks buildings.

The Trust believes that these alternative uses and sites satisfy the NEPA requirement for covering a reasonable range of alternatives for the lodge.

57 Alternatives for the History Center Should Be Evaluated

The History Center should be located in an existing building. Instead of placing a History Center at the southern end of the Main Parade as in Alternative 3, other sites should be considered on the Main Post. At least one alternative should be considered for new construction at a new location and at least one alternative should be considered for adaptive reuse of an existing structure.

Response The final SEIS analyzes new construction of a History Center (under Alternative 3), adaptive reuse of historic Building 2 for a Heritage Center (under Alternative 1), and adaptive reuse of another historic building (50) for a Heritage Center (under Alternative 2), all within the Main Post. The Trust believes that these alternative sites satisfy the NEPA requirement for covering a reasonable range of alternatives for the History Center.

58 Alternatives for the Theater Should Be Considered

The theater could be expanded to the west of the existing building to enable an appropriately sized reuse of the existing structure based on analysis of public uses, including interpretive, educational, cultural, performance, and film activities. In deference to its historical use, the addition and the main entrance should be oriented toward Moraga Street. The theater should include uses that complement its location in a national park and a historic district (i.e., uses other than mainstream cinema).

Response As a result of comments received during the NEPA process and the parallel Section 106 consultation under the National Historic Preservation Act, the Trust modified the proposed rehabilitation of the Presidio Theatre (Building 99) analyzed in the draft SEIS. As evaluated in the final SEIS, the Presidio Theatre would be rehabilitated for its

historic use as a venue for film and/or performing arts. The existing theater would not be subdivided and the addition would be subordinate to the historic structure. The main entrance on Moraga Street would be retained as well as the character-defining features of the auditorium interior. The proposed program envisions an international film arts center as well as other cultural and community uses. Other alternatives analyzed in the SEIS for the theater include a cultural/educational facility with no expansion (under Alternative 3) and a “highest and best use,” presumably office (under Alternative 4). The Trust believes that these alternative uses satisfy the NEPA requirement for covering a reasonable range of alternatives for the theater.

59 Alternatives Prepared by the PNRWG and NAPP Should Be Evaluated

The draft SEIS does not identify a reasonable range of alternatives and should provide sufficient detail and analysis to allow the selection of any alternative other than the proposed action. The Trust should consider and evaluate alternatives prepared by the Presidio Neighborhood Working Group (PNRWG) and Neighborhood Associations for Presidio Planning (NAPP). PNRWG believes its alternative is based on sound planning principles and focuses on the heritage, history, and archaeology of the Main Post. NAPP asks the Trust to look to the PTMP and re-focus on the integrity of park values, “which nowhere includes the mandate of ‘revitalizing a city within a city.’” Both alternatives call for the placement of the art museum outside the Main Post and lodging within existing historic buildings, and a focus on history, with the Heritage Center as an important component, preferably in an existing building.

Response The alternatives proposed by PNRWG and NAPP fall within the range of alternatives analyzed in the final SEIS with potential impacts

closely aligned with either Alternative 1 or Alternative 4. Further, the mitigated preferred alternative (Alternative 2) includes many of the principal components of the PNRWG and NAPP alternatives. Alternative 2 features no new construction at the site formerly proposed for the art museum, lodging in historic Building 42, and a freestanding lodge (reduced in size from the former proposal) that may also incorporate historic Buildings 86 and 87. A key principle of Alternative 2 would be to reveal the Presidio’s history: to make history central to the visitor experience at the Main Post. A Heritage Center in the historic Officers’ Club and an archaeology center that would also include historic buildings remain central to the historic focus. Finally, the Trust believes that enriching the Main Post’s cultural vitality and making the area a safe, inviting, and comfortable place for diverse groups of people to gather is a goal that encompasses integral park values.

2.10 LAND USE PLANS AND POLICIES

60 The Preferred Alternative Conflicts with the Presidio Trust Management Plan

The preferred alternative in the draft SEIS represents a dramatic shift away from the PTMP’s policies and commitments. This change is not only problematic for the Main Post but could set the stage for the Presidio Trust to pursue additional levels of new construction in other districts of the Presidio not previously considered or analyzed. The Trust should share with the public other changes to the PTMP that it may be contemplating for Area B of the Presidio (namely Crissy Field and Fort Scott) so that the Main Post changes can be understood within that larger planning context. The proposed changes to the Main Post so exceed the parameters of what was considered and approved in the PTMP that either

the preferred alternative needs to be revised to align with the PTMP, or the Trust needs to expand the project boundaries to include those other planning areas that would be affected by actions under consideration at the Main Post.

Response The mitigated preferred alternative (Alternative 2) in the final SEIS generally adheres to the PTMP and poses no constraints on plans in other districts, nor does it imply changes in other districts. Any inconsistencies between the mitigated preferred alternative and the PTMP's policies and commitments are fully discussed in Section 3.2 Land Use Plans and Policies in the final SEIS. The PTMP is a high-level, programmatic document that the Trust anticipated would change in response to changing circumstances (see PTMP, page 136) and to achieve the Trust's goals. Proposed changes to the PTMP that the mitigated preferred alternative would bring about are principally an increased amount of new construction and demolition, but a net reduction of square footage in the district. The mitigated preferred alternative includes more public uses and less residential and office use than identified in the PTMP.

The PTMP identified new construction and building demolition caps for each of the Presidio's planning districts, providing guidance for how the built space of the Presidio would be managed. The PTMP also identified a goal of reducing the amount of square footage in the park from 5.96 million square feet to 5.6 million square feet. The Main Post Update would not change that goal. It is reasonable to expect that the distribution of land uses may shift to some degree, but the Main Post Update would retain the overall commitment made in the PTMP for a balanced use of built space; the Main Post Update would allocate one-

third for residential use, one-third for office use, and the remaining one-third for cultural, education, and public-serving uses.

61 Two Large Museums Conflict with the PTMP

The Main Post Update creates internal inconsistencies with the goals of the PTMP due to the lack of direction for the future use of the Commissary site. This site is intended to be converted to a museum under the PTMP. The Main Post Update is narrowly focused and does not invoke PTMP concepts and guidelines for the Crissy Field district. Therefore, the untenable result would be that two large museums in excess of 100,000 square feet could be permitted in the Presidio. This raises the question of whether the Main Post Update and the PTMP can coexist or whether a full revision of the PTMP is necessary to accomplish the project goals as written.

Response The proposal for a museum of contemporary art has been withdrawn and is not analyzed in the final SEIS. The Trust identified preferred land uses in the PTMP, but inherent in the plan is the flexibility to adjust land uses as long as the "general character of the area" is not compromised (see PTMP, page 135). The general character of the Main Post is public, and the purpose and need of the Main Post Update is to re-establish the Main Post into the "heart of the park," a center for the park community and visitors alike. The consistency of the mitigated preferred alternative with the PTMP is discussed in Section 3.2 Land Use Plans and Policies in the final SEIS. The discussion finds that the mitigated preferred alternative is generally consistent with the PTMP, is respectful of the general character of the Main Post, and would help achieve the vision of the Main Post as the "heart of the park."

62 Assertions Regarding NHLD Status Are Contradictory

Section 3.2 Land Use Plans and Policies in the draft SEIS states that under Alternative 2, the Presidio's National Historic Landmark status would be preserved, and that proposed changes within the Main Post would comply with the National Historic Preservation Act and be compatible with the park's setting. This assertion is contradicted in Section 3.6 Historic Resources.

Response As a result of comments received during the NEPA process and the parallel Section 106 consultation under the NHPA, the Trust modified the initial proposed action analyzed as Alternative 2 in the draft SEIS (and the subsequently identified preferred alternative) and has now analyzed a mitigated preferred alternative. Under the mitigated preferred alternative (Alternative 2) in the final SEIS, the Presidio's National Historic Landmark status would be preserved. Consistent with the NHPA, implementation of projects that may result in adverse effects would be guided by the PA-MPU (Appendix B of the final SEIS) with the goal of avoiding, minimizing, or mitigating the adverse effects.

63 Square Footage Totals for Other Planning Districts Should Be Clarified

The Trust should clarify how the square footage changes analyzed in the SEIS would affect or change the total reduction in square footage for the entire Presidio as stated in the PTMP. It is not clear how each of the alternatives included in the SEIS would aid in achieving that goal. Since there is the potential for a net increase in square footage at the Main Post, where would the offset (decrease) in square footage occur? What would the square footage totals be for the other planning districts?

Response The net result of the mitigated preferred alternative would be a reduction of square footage in the Main Post. This alternative and the

others considered would not change the target reduction of square footage park-wide, from 5.96 million square feet to 5.6 million square feet, as stated in the PTMP.

2.11 TRANSPORTATION AND PARKING

64 A Park-Wide Transportation, Traffic, and Parking Plan Is Required

The Trust does not have a park-wide transportation, traffic and parking plan and the SEIS is deficient without such a plan. The Trust must prepare such a plan before concluding the SEIS process to properly understand, quantify, and prepare feasible steps to meet expected visitation.

Response Transportation is an integral topic in the park-wide PTMP, which considers vehicular circulation and parking. The PTMP also includes a transportation demand management (TDM) program in Appendix D that identifies sustainable transportation management practices to encourage carpooling, the use of transit and bicycling, and telecommuting. Some TDM strategies are mainly applicable to employees, but eliminating employee automobile trips will benefit the overall amount of traffic generated by uses in the Presidio. The transportation analysis in the final PTMP EIS and the final Main Post Update SEIS consider the cumulative traffic, transit, and parking effects of all uses in the Presidio.

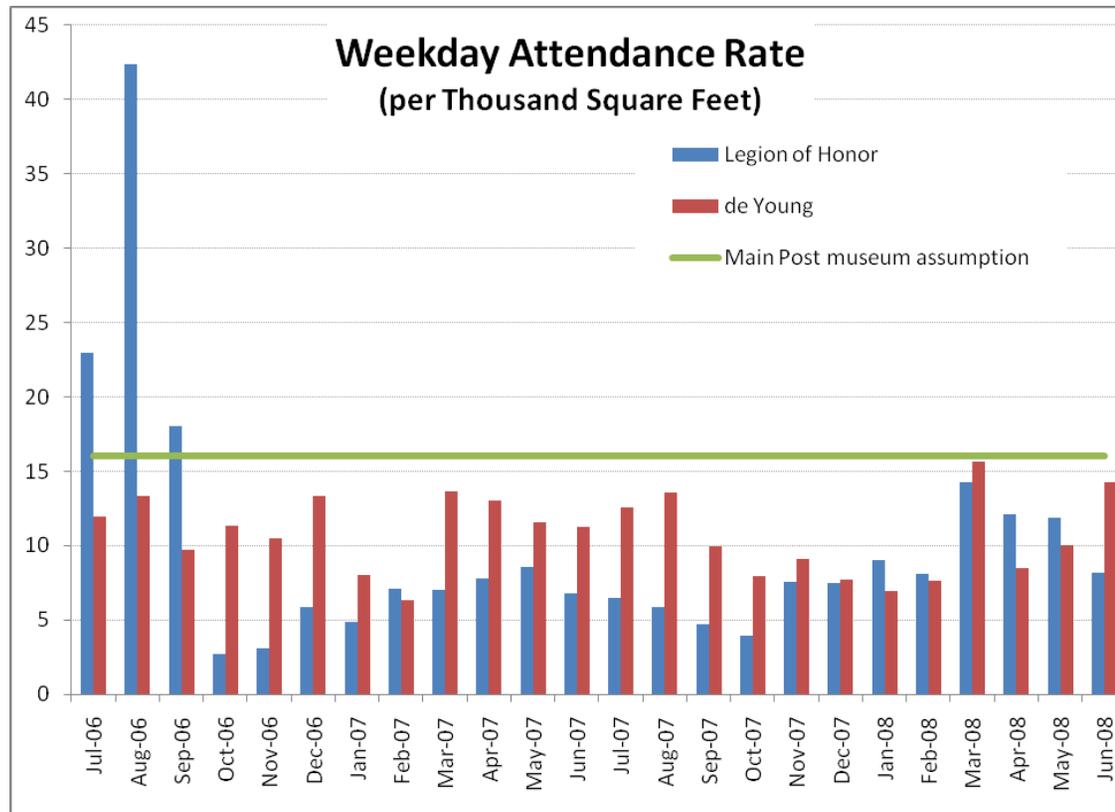
65 The Visitation, Traffic, and Parking Estimates do not Take into Account Seasonal Variations in Attendance at the Main Post Buildings

Museums, in particular, have a very strong seasonal pattern, with peaks and troughs by month, and high peaks associated with special exhibits,

free days or extended hours. The method used in the traffic analysis to estimate daily and weekend traffic is based on annual estimates divided by days in the year. Peak traffic is estimated for weekday hours and weekend hours assuming all visitation and traffic is equally distributed by day and week throughout the year. The differences in monthly visitation are from 30 percent to 100 percent greater than the average. Daily peak traffic and weekend peak traffic are severely understated and should take into account these peak months.

Response The contemporary art museum proposal (CAMP) has been withdrawn. Traffic estimated for the CAMP (formerly part of

Alternative 2) and the History Center (Alternative 3) in the draft SEIS and final SEIS is not based on annual estimates divided by days in the year as asserted by the commentor. The weekday trip generation rate used for these projects reflects a typical peak day. A comparison of the assumed attendance rate (person round-trips per thousand square feet) for the History Center compared to average weekday attendance rates for the Legion of Honor and the de Young Museums by month over the past two years is provided below. The assumed trip generation rate for the History Center is 32.1 two-way (or 16.05 round-trip) person trips per thousand square feet, and is well above the average monthly weekday



attendance for these two museums, with the exception of attendance at the Monet exhibition at the Legion of Honor.

66 The CAMP Estimates are Too Low and the History Center Estimates Appear Unsupported or Too High

The traffic impact of the CAMP is severely underestimated compared to Alternative 1. It is probable that the necessary increase in museum estimates would cause demand for parking to exceed supply in the Main Post. These traffic impacts, causing backups and delays in the Main Post and at entry/exit points to the Presidio, would seriously affect the feeling of the Main Post, and are a negative impact not addressed in the SEIS.

Response The contemporary art museum proposal has been withdrawn. See the response directly above regarding the trip generation assumptions used for the museum of contemporary art (formerly in Alternative 2) and History Center (in Alternative 3).

67 An Analysis of the Existing-Plus-Project Condition Is Needed

The traffic analysis scenarios evaluated in the SEIS include only the existing condition and the year 2030 cumulative condition combined with the project-generated traffic. The SEIS needs to provide an analysis of the existing-plus-project condition. Without this scenario, the reader cannot determine the project's traffic impacts on study area intersections. How much of the growth in traffic assumed for year 2030 would be due to increased regional traffic versus traffic generated by the proposed project?

Response A comparison of existing and existing-plus-project conditions with the mitigated preferred alternative (Alternative 2) is provided in Table 11. The table provides the reader an understanding of the relative impacts of the proposed changes in the Main Post. However, because the analysis assumes the existing roadway network and full occupancy of all

buildings in the Main Post, it is an artificial construct. Main Post buildings would be occupied over several years, and the direct Doyle Drive access would most likely be complete before all buildings in the Main Post are occupied. Thus, the existing roadway network would likely change before the project (full occupancy of Main Post buildings) is completed.

68 Analysis of Changes in Traffic and Parking Over Time Is Needed

Traffic and parking projections should not be limited to 2030, but rather, should be provided in a minimum of 5-year increments. This kind of timeline is necessary for the public to better comprehend how traffic conditions would change over time, and how any near-term problems would be addressed. The public deserves to see estimates of early changes to traffic and parking conditions and the assumptions on which the estimates are based. Estimates based on a single time in 2030 are projections without a commitment to allow the public real input and understanding of what will be happening over the next 20 years.

Response It is typical for NEPA transportation analyses to consider impacts based on a 20-year time horizon in order to consider the effects of a given project in the context of other projects in the area. In this case, evaluating conditions in 2030 considers new uses at Fort Scott and Crissy Field as well as changes to the roadway network associated with the Doyle Drive reconstruction. In response to public request for a near-term analysis, an “existing-plus-project” traffic analysis was performed for Alternative 2 (see response directly above). In addition, the Trust will continue to periodically monitor traffic conditions, transit ridership, and parking occupancy in order to respond to changes in these conditions over time.

11 COMPARISON OF EXISTING AND EXISTING-PLUS-PROJECT CONDITIONS

	<i>AM Peak Hour</i>				<i>PM Peak Hour</i>			
	<i>Existing Conditions LOS & Delay (seconds/vehicle)</i>		<i>Existing + Alternative 2 LOS & Delay (seconds/vehicle)</i>		<i>Existing Conditions LOS & Delay (seconds/vehicle)</i>		<i>Existing + Alternative 2 LOS & Delay (seconds/vehicle)</i>	
Lombard/Divisadero	B	12.4	B	13.5	B	12.0	B	13.7
Lombard/Richardson	A	7.0	A	8.6	A	4.5	A	6.2
Lyon/Lombard	F	68.4	F	>70.0	E	38.0	F	>70.0
Greenwich/Divisadero	B	12.8	B	13.0	B	13.0	B	13.3
Greenwich/Lyon	A	8.3	A	8.3	A	8.3	A	8.4
Francisco/Richardson	B	11.7	B	12.4	B	11.5	B	11.7
Richardson/Gorgas	A	6.7	A	4.6	A	7.2	B	12.2
Doyle/Marina/Lyon	C	26.5	C	26.5	B	11.0	B	11.0
Graham/Lincoln	B	10.7	C	18.6	B	10.5	E	39.6
Lincoln/Halleck	C	22.2	F	>70.0	C	19.9	F	>70.0
Lincoln/Girard	B	14.6	D	28.8	B	14.3	F	>70.0
Presidio/Letterman/Lincoln	C	18.4	F	58.8	B	12.7	E	43.7
Lombard/Presidio	E	42.9	F	59.2	C	24.7	E	36.2
Presidio/Pacific	D	28.5	E	36.5	C	23.4	D	32.3
Presidio/Jackson	E	37.1	F	50.3	D	29.6	E	44.9
Presidio/Washington	C	22.9	D	28.9	C	21.5	D	30.4
Arguello/Jackson	C	15.4	C	17.8	B	14.0	C	16.7
Arguello/Washington St	C	22.6	D	28.4	C	18.6	C	24.7
Arguello/Moraga	B	10.4	B	11.0	B	10.1	B	10.9
Montgomery/Sheridan	B	14.3	C	20.7	A	8.2	B	10.7

69 A Level of Service Analysis Is Inappropriate for Assessing Impacts on Residential Communities

The traffic assessment is conducted only by level of service (LOS) analysis, which is not an appropriate measure of traffic's impact on residential communities and park activities. LOS is a measure of "through-put," which assesses how quickly the total predicted load of vehicles is moved along a commuter route, and does not assess pedestrian safety, compatibility with bicycles, traffic noise, traffic safety

impacts, or any of the other factors that relate to the enjoyable use of a park or a residential area. A high LOS supporting a high volume of vehicles is commonly associated with roads that are neither pedestrian- nor bicycle-friendly. Consequently, implementing mitigation measures that improve LOS does not mean that the traffic impact would be made acceptable. Further analysis is required to assess pedestrian safety, compatibility of predicted automobile traffic with bicycle traffic on roadways in the Presidio and the surrounding neighborhoods, traffic

noise, traffic safety impacts, and any of the other factors that relate to the enjoyable use of a park or a residential area.

Response The LOS calculations are a measurement of average vehicle delay at a particular intersection, and vehicle delay is largely a matter of the volume projected to travel through an intersection compared to the intersection's traffic flow capacity. The LOS methodology is the methodology adopted by the San Francisco Planning Department Office of Environmental Review as described in Transportation Impact Analysis Guidelines (October 2002). A LOS A or B rating does not necessarily reflect a high volume of vehicles, since it considers both volume (i.e., demand) and capacity (i.e., supply). LOS A or B could indicate a low-volume street with a wide range of capacity or a higher-volume street with adequate capacity to carry that volume of traffic. Therefore, traffic LOS is not an indicator of safety. Safety concerns are best addressed through intersection design, traffic calming measures, and enforcement of speed limits.

The Trust believes that intersection LOS is a reasonable indicator of traffic congestion but agrees that it is not a superior indicator of overall transportation system performance. The San Francisco Planning Department is considering revisions to its transportation impact analysis methodology to better reflect many of the factors raised by the commentor. Should the San Francisco Planning Department adopt revisions to the existing methodology, the Trust will revise its methodology accordingly.

70 A Special Events Traffic Management Plan Should Be Developed

The frequency of special events is not discussed in the SEIS. While a limited number of special events on an annual basis would not require a

technical analysis, a large number of special events could create a burden on the city's transportation system and on adjacent neighborhoods. Mitigation Measure TR-21 states that if parking demand exceeds the supply, the event sponsors may be required to provide special transit service. There is no commitment under this mitigation measure that the parking, transit, and traffic needs of the special events would be managed in a way that would not affect the city's transportation system and adjacent neighborhoods. A provision should be added to the special event traffic management mitigation measure to assure that event sponsors are required to develop a transportation management plan in cooperation with the city to adequately address the transportation needs of such events. The event sponsors should be made financially responsible for the provision of additional transportation services to the Presidio.

Response The Presidio currently hosts over 50 special events each year, and the Trust coordinates with the United States Park Police and other stakeholders (including the City and County of San Francisco) to successfully manage events through a special use permit process. Event planners are required to develop traffic management plans to indicate how event-generated and background traffic, parking, and pedestrian operations would be managed within the area affected on the days of the event. The plans must address site access and parking, pedestrian access, traffic flow and control, and traffic incident management and safety.

Events range in size and magnitude of transportation impacts. Of the more than 50 annual events, fewer than 10 have heavy parking demand. Large races are generally scheduled to pass through the Presidio no later than 11:00 AM. Some large organized events often implement transportation management strategies as a matter of standard practice, including busing participants to and from hotels downtown or other sites.

71 Impacts of Traffic Diversions on Previously Low-Traffic Streets Should Be Considered

Traffic mitigation looks primarily at adding signals to intersections, both within the Presidio and in adjoining neighborhoods. However, the traffic analysis should consider the impact of diverting high volumes of traffic onto previously low-traffic residential streets. Presidio staff has stated the expectation that cars would disperse onto residential surface streets upon leaving the Presidio, thus relieving congestion. Based on other experiences with large developments in the area, such as the California Pacific Medical Center (CPMC) Pacific Site, this would bring adverse impacts to the residential areas. The traffic analysis should assess the impacts of the proposed mitigations, such as signalization, on the nearby residential neighborhoods, paying particular attention to increased traffic levels throughout the day and safety issues such as vehicle speeds, running of lights, and pedestrian safety.

Response The traffic generated by uses in the Main Post would naturally be more dispersed at greater distances from the Main Post. Traffic traveling to and from the Main Post is expected to be dispersed to the Arguello Gate, Presidio Boulevard Gate, Lombard Gate, Marina Gate, and Doyle Drive via Girard Road. The analysis in the SEIS includes two intersections on Greenwich Street to evaluate the possible effect of additional traffic on this street. The resulting levels of service suggest that these intersections would not be significantly affected by the additional traffic generated by the Main Post uses.

Traffic signals are not inherently less safe than stop signs. Enforcement of speed limits and red lights at traffic signals is the responsibility of law enforcement, including the United States Park Police in the Presidio and the San Francisco Police Department in the City and County of San

Francisco. The Trust is committed to considering intensifying transportation demand management strategies to minimize traffic volume and thereby avoid the need for traffic signals in the park.

72 Traffic Variations and Interaction with Other Activities in Surrounding Areas Should Be Analyzed

The traffic analysis only looks at AM/PM peak period traffic. The traffic assessment does not assess the distribution of traffic and interaction with other activities in the surrounding area except for the weekday peak AM/PM rush hour. Traffic pattern variations that occur throughout the day, on weekdays vs. weekends, due to seasonal changes, during vacation periods, and so on are not assessed in sufficient detail. Data from other museums clearly demonstrate that museum attendance varies significantly from average (e.g., 33 percent greater in July to 40 percent lower in October). Special exhibits can draw large crowds for extended periods. It is reasonable to expect that, in addition to increasing peak commute demand, increasing recreational visitors would increase the level of traffic throughout the day, possibly to near peak hour levels for extended periods.

Response The commentor is correct that the draft and final SEIS traffic analysis is based on traffic conditions in the AM peak hour and PM peak hour. These periods are analyzed because they are expected to be the time when traffic volumes on the surrounding roadway network are greatest. Traffic conditions at many study intersections are not only affected by traffic generated by uses in the Main Post, but also by pass-through traffic unrelated to uses in the Presidio. Pass-through traffic volumes are greatest during the standard AM and PM commute periods. Therefore, the combination of all traffic volumes is expected to be

greatest during the typical weekday commute hours. Traffic mitigation measures identified for weekday commute hour conditions would also improve the operation of these intersections on weekends.

73 Conflicts Exist with City and National Park Service Transportation Policies

The creation of major destination institutions in the Presidio, which is inadequately served by public transit, conflicts with the San Francisco transit-first policy and with the National Park Service policy to minimize auto use in national parks.

Response The principles of the city's transit-first policy do not restrict types of land use by geographic location. Rather, the principles of the transit-first policy encourage and facilitate traveling by public transit (including taxis and vanpools) as well as bicycling and foot.

Specifically, ten principles constitute the city's transit-first policy:

1. To ensure quality of life and economic health in San Francisco, the primary objective of the transportation system must be the safe and efficient movement of people and goods.
2. Public transit, including taxis and vanpools, is an economically and environmentally sound alternative to transportation by individual automobiles. Within San Francisco, travel by public transit, by bicycle and on foot must be an attractive alternative to travel by private automobile.
3. Decisions regarding the use of limited public street and sidewalk space shall encourage the use of public rights of way by pedestrians, bicyclists, and public transit, and shall strive to reduce traffic and improve public health and safety.
4. Transit priority improvements, such as designated transit lanes and streets and improved signalization, shall be made to expedite the movement of public transit vehicles (including taxis and vanpools) and to improve pedestrian safety.
5. Pedestrian areas shall be enhanced wherever possible to improve the safety and comfort of pedestrians and to encourage travel by foot.
6. Bicycling shall be promoted by encouraging safe streets for riding, convenient access to transit, bicycle lanes, and secure bicycle parking.
7. Parking policies for areas well served by public transit shall be designed to encourage travel by public transit and alternative transportation.
8. New transportation investment should be allocated to meet the demand for public transit generated by new public and private commercial and residential developments.
9. The ability of the City and County of San Francisco to reduce traffic congestion depends on the adequacy of regional public transportation. The City and County of San Francisco shall promote the use of regional mass transit and the continued development of an integrated, reliable, regional public transportation system.
10. The City and County of San Francisco shall encourage innovative solutions to meet public transportation needs wherever possible and where the provision of such service will not adversely affect the service provided by the Municipal Railway.

The Presidio Trust shares these principles. As described in the PTMP, “The Presidio Trust will use environmentally responsible transportation strategies to improve mobility within the park, minimize private automobile use, increase the use and availability of public transit and pedestrian and bicycle travel options, and improve connections to regional transportation systems.” The Trust has an aggressive transportation demand management (TDM) program in place to reduce overall reliance on the automobile by encouraging alternatives such as walking, biking, carpool/vanpools, and transit. The Trust’s TDM program consists of activities conducted by the Trust and by the park’s tenants. Activities conducted by the Trust serve residents, employees, and visitors, and currently include a shuttle bus system throughout the park and downtown, parking management, and a Guaranteed Ride Home program.

The park’s non-residential tenants are required to participate in the Presidio TDM program through their lease agreements. Each tenant is required to submit a TDM plan. Each tenant’s TDM plan must include required activities that promote the park-wide TDM services to their employees. Tenant-specific TDM requirements are subject to individual lease negotiations. More details on the Trust’s TDM program can be found in Appendix D of the PTMP.

The provision of destinations in the park does not inherently conflict with the objective of minimizing automobile use. Destination uses are often the cornerstone of park visitor experiences. The Presidio is a park in an urban setting, and the Main Post has historically been and will continue to be the heart of the Presidio. As such, the Main Post is a fitting location for a denser population than other areas of the Presidio and other national parks. This is consistent with the Trust’s commitment to public

use. It is the Trust’s goal to make a portion of the building space in the Main Post available for public uses and to develop a sustainable transportation system; the Trust does not consider these two goals to be mutually exclusive.

The CAMP is no longer being considered for the Main Post. The lodge remains in the mitigated preferred alternative (Alternative 2). It is relatively common for national parks to provide lodging, offering visitors an overnight park experience and allowing them an opportunity to explore the park from a centralized location. Providing overnight accommodations would allow park visitors from afar to experience the Presidio while minimizing the number of trips through the park’s gates.

74 Traffic Impacts on the Greater Presidio Should Be Analyzed

The traffic analysis estimates traffic impacts on the Main Post and various gates and intersections outside the Presidio. However, the analysis does not estimate the impact of the art museum and related vehicular traffic on the larger Presidio.

Response The traffic analysis considers the effect of traffic generated by Main Post uses on the intersections that would be most affected by any increases in traffic associated with uses in the Main Post. Presidio intersections farther removed from the Main Post (e.g., Lincoln Boulevard/Kobbe Avenue) would experience a negligible increase in traffic associated with uses in the Main Post and therefore were not included in the analysis. The proposal for a museum of contemporary art has been withdrawn, and the comparison of the mitigated preferred alternative (Alternative 2) to Alternative 1 in the final SEIS illustrates the minor changes in delay that would be caused by proposed land use changes in the Main Post.

75 The Parking Demand Assumption Is Inconsistent with the Recreational Use Pattern

The traffic analysis asserts that demand for parking on weekends is expected to be less than on weekdays. This assertion is unsupported and inconsistent with expectations of a recreational use pattern. Museum and recreational uses peak on weekends, and all visitor-serving functions would have full staff on weekends. The number of proposed Main Post parking spaces would not be adequate to serve the larger number of vehicles expected during seasonally high peak visitation months, both daily and on weekends. The SEIS does not include seasonal visitation and related traffic and parking estimates., nor does it address such one-time events as the Pacific Rim Hawaiian Festival and the other many festivals that would consume all parking spaces and make it impossible for the art museum to find parking for its visitors.

Response The contemporary art museum proposal has been withdrawn and is no longer included in the mitigated preferred alternative (Alternative 2). Although the Main Post is expected to have more visitor-oriented uses under Alternative 2 than under the PTMP, there would still be a substantial amount of office space at the Main Post. On weekends, office uses typically demand only about 10 percent of the parking area they occupy on weekdays. The reduction in office-related parking demand on weekend days is greater than the estimated increase in parking demand for visitor-oriented uses. Tables in Appendix A identify the estimated parking demand by land use for weekdays, evenings, and weekends for each alternative. For Alternative 2, the table shows that office-related parking demand (before TDM reduction) is 959 spaces on weekdays and 96 spaces on weekends, making over 850 parking spaces available for other uses on weekends.

76 Parking Demand Estimates Should Be Compared to Parking Supply

The SEIS should identify specific areas within the Main Post that are likely to have more parking demand than can be accommodated within walking distance of the attraction and the areas where parking may be underutilized. The statement that "regardless of location, the majority of parking would be within a five minute walk (approximately 1,500 feet) of any building in the Main Post" does not provide information on the location of the parking in relation to the proposed land uses that will create future parking demand. The SEIS does not analyze the parking impacts of the proposed developments on the neighborhoods bordering the Presidio. Some of the visitors of the Letterman Digital Arts Center park on city streets. The SEIS needs to address what measures could be used to reduce parking impacts on adjacent neighborhoods.

Response All uses in the Main Post would generate demand for parking. Due to the shared parking approach, it is impossible to illustrate parking supply and demand for every building at the Main Post. Parking spaces needed by some uses and buildings on weekdays would be free for use by others on weekends. Figures 3, 6, 9, and 12 in the final SEIS illustrate the location of parking in the Main Post and Table 16 in the final SEIS indicates the approximate number of spaces in these parking areas.

The final SEIS does not consider the potential for parking demand from the Main Post to "spill over" into adjacent San Francisco neighborhoods because the walking distance to these neighborhoods from the easternmost point of the Main Post is 12 minutes or more. When combined with the existing parking time restrictions in the adjacent neighborhoods, it is unlikely that visitors or employees would walk from the Lombard Gate to the Main Post. In the neighborhood outside the Lombard Gate, the current time restriction for vehicles without a K

residential parking permit from the city is three hours. Reducing this time restriction from three hours to two hours would further discourage spillover parking from Main Post employees and visitors.

77 Possible Parking Mitigations Should Be Considered

TDM policies that discourage driving into, and parking within, the Presidio increase the probability of Presidio visitors and tenants parking in the neighboring community. The draft SEIS assumes that visitors would not park in the adjoining neighborhoods because of the need for residential permits. However, there is no evidence of effective enforcement programs to date, especially those that do not create even more problems for residents. Installing parking meters in residential neighborhoods is unacceptable. As a result, the traffic analysis ignores a key factor that affects both the quality of life for residents and the ability of local neighborhood-serving businesses to attract clients.

Response The backbone of any TDM program is parking management, and the Trust is dedicated to managing transportation demand to promote sustainable transportation practices, minimize the amount of traffic generated by Presidio uses, and reduce the amount of park land used for parking lots. The Trust is not proposing that parking meters be installed in residential neighborhoods surrounding the Presidio. The purpose of the residential permit zones is to provide more parking spaces for residents by discouraging long-term parking by people who do not live in the area. It is not clear how enforcement of residential parking restrictions is problematic for neighborhood residents. Just as the enforcement of parking restrictions in the Presidio is the responsibility of the United States Park Police, enforcement to ensure effectiveness of the

San Francisco preferential residential parking system is the responsibility of the City and County of San Francisco.

The Main Post is at least a 12-minute walk from the nearest Presidio gate (the Lombard Gate). Visitors staying in the Main Post for a couple of hours are unlikely to park this far away to avoid parking fees for such a short period of time. Main Post employees would not be able to legally park in surrounding city residential neighborhoods for the duration of the typical workday. The K residential parking permit zone is near the Lombard Gate, and the current time restriction for vehicles without a K residential parking permit is three hours. Reducing this time restriction from three hours to two hours would further discourage spillover parking from Main Post employees and visitors.

78 Pedestrian and Bicycle Intensity and Traffic Interactions are Misleading

The sections dealing with bicycle and pedestrian usage refer to the Presidio Trails and Bikeways Master Plan, implying that this document contains an accurate assessment of use intensity and traffic interactions. The Presidio Trails and Bikeways Master Plan does not address the issue of traffic intensity and bicycle usage adequately. The traffic analysis should address the parking demands for peak usage, safety issues for pedestrians and cyclists caused by drivers in hunt of the scattered parking spaces, and the overflow impacts on the city.

Response The analysis of pedestrian and bicycle conditions in environmental review documents is typically based on the pedestrian and bicycle facilities and their ability to accommodate the anticipated volumes of bicycle and pedestrian volumes, and the assessment of any project-related safety issues. The Trust agrees that mobility and safety for cyclists are inversely proportional to the volume of automobile traffic

on the same street, but believes traffic hazards can largely be mitigated by dedicated facilities (e.g., striped in-road bike lanes). Given a fixed amount of right-of-way, decisions can be made to make the convenience and safety of cyclists a higher priority than automobile throughput. An example of this is the Trust's decision to reduce the number of automobile lanes on Lincoln Boulevard from four lanes to two lanes with left-turn pockets in order to add bike lanes. Other pedestrian and bicycle facilities described in the Presidio Trails and Bikeways Master Plan would adequately accommodate the expected number of pedestrians and cyclists and minimize conflicts with automobile traffic.

None of the projects evaluated in the final SEIS has been developed to a level of detail that would allow for an assessment of pedestrian and cyclists safety issues. As detailed design for projects progresses, conflicts between pedestrian and cyclist movements and vehicular traffic (e.g., at driveways, loading areas, building ingress/egress points, etc.) would be considered during site-specific review, and measures to address any safety concerns would be incorporated into project plans.

79 Tour Bus Impacts Should Be Analyzed

The traffic analysis should address the possible impacts of tour buses and offer plans to mitigate possible adverse impacts, such as increased noise and vibration in neighboring residential districts.

Response Tour buses are expected to comprise a relatively small percentage of traffic in the Presidio. There are no estimates of the increased volume in tour buses traveling to and from the Presidio. The ability to manage tour bus activity on particular city streets lies with the City and County of San Francisco. The city has restricted tour buses in certain areas surrounding the Presidio, including portions of 25th Avenue

and El Camino del Mar outside the 25th Avenue Gate, 15th Avenue immediately outside the Presidio boundary, Marina Boulevard and many of the streets in the Marina district, and a portion of Lyon Street just outside the Lombard Gate.

80 A Discussion of Loading Activities Should Be Provided

It is not clear if loading is envisioned to take place on Presidio streets or within the buildings. If any double-parking occurs as a result of truck deliveries, it would exacerbate the traffic congestion within the Presidio and could spill over or divert to city streets.

Response In some cases, dedicating available curb space to loading functions may be appropriate, particularly if such an approach would allow multiple small buildings to share loading zones. In other cases, an off-street loading dock may be necessary to avoid impacts on traffic flow. In general, the Main Post's historic street network of minor roadways or alleys at the backs of buildings (e.g., Taylor Road, Mesa Street) and primary roadways in front of buildings (e.g., Montgomery Avenue, Funston Avenue) allows space for loading activities to occur at the backs of buildings without adversely affecting traffic flow at the Main Post.

Using the city's methodology, a lodge with 110 rooms, which is included in the mitigated preferred alternative (Alternative 2), is estimated to require two spaces for passenger loading and unloading.

81 Information on the Location and Impacts of New Parking Is Deficient

The supplement does not show new parking areas, nor does it show the expansion of parking at or west of Building 386. The figures in the supplement show the area west of Building 385 as surface parking, when

in fact it is shown as open space in the photos. A “substantial acreage of green” would be lost for parking for the art museum. This should be presented and discussed. In addition, the increase from 250 to 350 spaces at the proposed underground parking area at the north bluff should be presented and its impacts discussed. When Doyle Drive is completed, and Building 201 (and possibly Building 204) are taken down, the area from the existing north bluff lot (100 spaces) would be open space. What alternatives are there to adding a new 300-space underground lot? Have they been considered? What are the impacts of an underground parking garage at that area?

Response Figures 3, 6, 9, and 12 in the final SEIS and Table 16 of the final SEIS illustrate the location of all sizeable parking areas, including the area south of Moraga Street and west of Arguello Boulevard, near Building 386. The demolition of Building 385 would allow for the expansion of this parking lot from 36 spaces to approximately 235 spaces; the loss of “green space” would be minimal compared to the increase in green space in the more centrally located Main Parade.

The surface parking lot at the north bluff would not be eliminated with the construction of Doyle Drive; in fact it is assumed to approximately double in size. Even with the expansion of this surface parking lot, the Doyle Drive tunnel construction would still allow approximately 4.5 acres of green space, extending from the north bluff to Mason Street. Although the north bluff site has been investigated adequately to estimate the feasible number of parking spaces at this location, there is not a sufficient level of detailed design to accurately estimate construction costs. The construction of the Doyle Drive tunnel near this location will allow for the surface lot at the north bluff to be expanded from approximately 100 spaces to over 200 spaces. Given the high

construction costs associated with underground parking, the Trust would continue to consider alternative means to accommodate parking demand before building additional underground parking.

82 Estimates of Current Parking Space Utilization and Demand are Outdated

The parking analysis in the supplement does not take into account recent parking fees introduced at parking areas close to or in the Main Post district. Since the last Trust survey, parking tolls have been introduced in many places in and near the Main Post district. The parking tolls have resulted in a huge increase in the use of the Main Parade untolled area. An estimate should be made of the impact of parking fees for existing and proposed land uses wiunder the Main Post Update. No quantitative estimates of the effect of fees on demand have been presented, other than a statement that fees would be charged, which should reduce demand for spaces. Many studies show the elasticity of demand for parking spaces related to fees charged. The Trust should take advantage of those resources and apply their results to the Presidio.

Response The SEIS conservatively assumes a 10-percent reduction in parking demand in the district under the mitigated preferred alternative (Alternative 2), and a 5-percent reduction in demand under Alternative 3. Based on past parking occupancy counts in the district, the Trust expects the reduction in parking demand due to parking fees to be greater than 10 percent, and therefore the reduction assumed under Alternatives 2 and 3 is conservative.

As the commentor notes, there are data available to estimate parking demand elasticities or rates estimating the change in parking demand associated with increases in fees, and these data are useful in estimating changes in parking demand over time. However, elasticities are typically

developed assuming market-rate conditions as a baseline, and parking in the Main Post is still currently free in some areas. Rates relating to changes in parking demand to parking supply vary by location and setting. In order to isolate changes in parking fees as the cause resulting in changes in demand, studies must gather data immediately before implementing changes and again immediately after implementing changes. Most municipalities with limited funding resources are not likely to gather such data twice within such a short period of time.

The Trust will continue to implement parking fees throughout the Main Post in the next few years and will continue to gather data on actual parking occupancy. Actual occupancy will continue to be compared to calculated demand on a regular basis. Comparing calculated estimates to real-world conditions will allow the Trust to continually refine parking demand estimates as parking fees are implemented more comprehensively throughout the Main Post.

83 The Trust Should Accept Financial Responsibility for Implementing Mitigation Measures

Five of the ten intersections that would operate at unacceptable levels of service in year 2030 are under the jurisdiction of the City and County of San Francisco. The SEIS proposes signalization of these intersections as a mitigation measure. The current cost to signalize these intersections is approximately \$350,000 each, for a total cost of approximately \$1,750,000. The city does not have funds to signalize these intersections. Public hearings are required before new traffic signals are installed within the city. Therefore, even if funding for new traffic signals were available, it cannot be assured that the traffic signal mitigation measures could be implemented. The SEIS needs to provide certainty that if and

when traffic mitigation measures would be required they can be funded and implemented.

Response The commentor correctly notes that signalization of city intersections would be under the purview of the City and County of San Francisco. Although signalization is physically feasible, the city may choose not to install signals. The Trust believes that the cost of signalization should be shared since much of the traffic passing through the identified intersections (e.g., Presidio Boulevard/Jackson Street) is not generated by uses in the Presidio, but merely passing through the park. The appropriate share of costs of the Trust and the City and County of San Francisco should be based on the relative volume of traffic traveling through the intersections.

84 More Information on Travel Demand Projections Is Needed

The SEIS does not provide enough information to follow how the transportation trip generation, trip distribution, trip assignment, and mode split assumptions were developed and applied. Therefore, the accuracy of the analysis cannot be assessed.

Response Table 8 in the final SEIS includes daily and peak hour person trip generation rates by land use as well as the percentage of trips assumed to be inbound and outbound. Mode-share assumptions vary with the land use type and whether the trip is internal to the park or not. Table 12 below indicates the assumed mode share for each land use type, as well as the percentage of trips assumed to be internal to the park. Table 9 indicates the resulting total number of daily and peak hour person trips by mode and vehicle trips for each alternative. The mode-split assumptions in Table 12 are also described in the final PTMP EIS Background Transportation Report.

12 MODE SHARE BY LAND USE

<i>Land Use</i>	<i>Percent of Trips Internal to Presidio</i>	<i>Auto Occupancy Rate (persons per auto)</i>	<i>External Trips</i>			<i>Internal Trips</i>		
			<i>Auto</i>	<i>Transit</i>	<i>Bike / Ped / Other</i>	<i>Auto</i>	<i>Transit</i>	<i>Bike / Ped / Other</i>
Industrial Warehouse	20%	1.1	60%	23%	17%	50%	20%	30%
Office	22%	1.0	60%	23%	17%	50%	20%	30%
Retail	30%	1.4	65%	18%	17%	50%	20%	30%
Restaurant	30%	1.4	65%	18%	17%	50%	20%	30%
Lodging	75%	1.3	60%	23%	17%	50%	20%	30%
Conference	25%	1.3	60%	23%	17%	50%	20%	30%
Recreation	50%	1.5	60%	23%	17%	50%	20%	30%
YMCA	25%	1.1	70%	13%	17%	70%	13%	17%
Cultural / Education	20%	1.5	60%	23%	17%	50%	20%	30%
Theater	20%	2.0	75%	18%	7%	75%	18%	7%
Residential	45%	1.2	60%	23%	17%	50%	20%	30%
Infrastructure	80%	1.1	60%	23%	17%	50%	20%	30%
Military	10%	1.5	60%	23%	17%	50%	20%	30%

85 The Amount of Additional Muni Service Needed to Serve Projected Ridership and the Costs to Provide that Service Should Be Evaluated

The SEIS does not provide any information to compare new Muni demand to the available capacity. The SEIS does not provide supporting analysis to conclude that the demand generated by the project could be

met by the current or forecasted Muni service. The SEIS assumes increased PresidiGo service that would accommodate one third of the Presidio's transit ridership. Is increased PresidiGo service funded through year 2030?

Response Due to the current severe San Francisco Municipal Transportation Agency (SFMTA) fiscal constraints, it is not possible to estimate future Muni service capacity accurately at this time. Implementation of the Transit Effectiveness Program would result in changes in Presidio-based ridership on routes serving the park, as well as ridership throughout the city. The final SEIS provides a comparison of the projected ridership for each transit under Alternative 1 with ridership under Alternatives 2, 3, and 4. The Trust is committed to expanding PresidiGo service to keep pace with demand. If downtown PresidiGo service were to be terminated, additional environmental review would be required.

86 Graphics in the MPU Show a Large New Surface Parking Lot at the North Edge of the Main Post

It is unclear where this proposal comes from, and how it will be reviewed.

Response The Trust is currently working with Caltrans (the lead agency for Doyle Drive) on how the landscape within the Temporary Construction Easement (TCE) for the project, including the Main Post tunnel top, will be treated. Similar to the removal of historic buildings in the Main Post by the Doyle Drive project (Buildings 204 and 230), those decisions are part of a separate undertaking and will be reviewed through the provisions in the PA for Doyle Drive.

87 The Draft SEIS Should Have Included Appendix A -Transportation Data

Public access to the transportation data was limited to viewing the information at the Presidio Trust's library.

Response Appendix A was also posted on the Presidio Trust's web site (http://library.presidio.gov/archive/documents/MP_SEIS_A.pdf) and therefore has been widely available for public review. Appendix A is over 200 pages in length and is mostly comprised of intersection level-of-service calculations. The pdf posted on the Trust's web site allowed readers to search the appendix and print only the pages of particular interest.

2.12 AIR QUALITY AND NOISE

88 Air Quality Impacts Are Underestimated

The supplement evaluates average carbon monoxide emissions from vehicle trips for the preferred alternative to be from 533.80 pounds per day. The Bay Area Air Quality Management District (BAAQMD) states that 550 pounds per day of carbon monoxide is a significant impact. The supplement does not estimate air quality impacts properly, given much higher visitation rates expected in the preferred alternative (up to 2.1 million) versus existing conditions (up to 660,000), a ratio of 3.2: 1. The ratio of average weekly vehicle trips between the preferred alternative (16,765) and Alternative 1 (13,951) is 1.2:1. The visitation ratio is not consistent with the vehicle trips ratio. Vehicle trips under the preferred alternative are potentially underestimated, and therefore the supplement underestimates the air quality impact.

Response The BAAQMD threshold for carbon monoxide of 550 pounds per day would not be exceeded by the motor vehicle activity caused by any alternative. The calculation method used (URBEMIS2007 model) is established for use in this type of forecast and widely accepted in California. Vehicle trip estimates are slightly lower for the mitigated

preferred alternative in the final SEIS than those shown for the preferred alternative in the supplement. Accordingly, all motor vehicle activity and emission rates for this alternative are lower.

The ratio of visitation to vehicle trip rates varies slightly among the alternatives because the mix of travel modes varies (e.g., transit or biking) due to the different uses. The commentor seeks to compare existing visitation rates to those of the mitigated preferred alternative, but this would not be appropriate because all the alternatives are forecasts of future year (2030) conditions.

89 Global Climate Change and Greenhouse Gas Emissions Should Be Analyzed

To address climate change, there needs to be an established baseline, with set greenhouse gas (GHG) reduction targets. The Main Post Update contains no such targets nor mentions any commitment to provide them. The Trust needs to commit to a 50-percent reduction in the next 30 years. The proposed action would set the framework for whether or not future managers will have that capability or not.

Response As discussed in the global climate change analyses in Section 3.4 Air Quality of the final SEIS, none of the alternatives under consideration would generate large enough quantities of GHGs to cause a substantial impact related to global climate change or disrupt California Air Resources Board (CARB) progress on achieving the goals of the California Global Warming Solutions Act of 2006 (AB32) or California State Executive Order S-3-05. Furthermore, no alternative would cause more than the Council on Environmental Quality's Draft NEPA guidance level of 25,000 metric tons or more of direct CO₂-equivalent GHG emissions per year. Nonetheless, the Trust would meet California's

statutory targets and comply with strategies currently identified by the California Air Resources Board. The global climate change analysis properly quantifies and discloses the GHG emissions associated with the alternatives for consideration by decision makers and the public. The primary sources of GHG caused by the alternatives would not be stationary sources that the Trust could directly control; instead, the traffic attracted to the land uses would be the main GHG source. The Trust focuses on implementing transportation demand management strategies to avoid and reduce mobile source activity, which are necessary for mitigating GHG emissions. The Trust would also adopt Mitigation Measure NR-26 *Climate Friendly Parks Program Participation*, which involves creating a GHG inventory and tracking GHG avoidance and reduction against future-year targets.

90 The SEIS Should Show How Air Quality Commitments Would Be Applied

The draft SEIS states that the Trust would adopt Mitigation Measure NR-26 *Climate Friendly Parks Program Participation*, but then only lists the NR-26 commitments, while saying nothing about how commitments would be implemented.

Response The Trust would review the applicability of the commitments to all of its environmental, transportation, and energy-related operations and activities, and integrate the commitments into its strategic planning and budget process. As discussed in Mitigation Measure NR-26, and as recommended by the Council on Environmental Quality, the Trust would use an environmental management system (EMS) as the primary management approach for tracking and reviewing performance following implementation of the commitments.

91 The Conformity Issue Should Be Revisited to Determine Whether the Applicability Threshold Would Be Exceeded by Construction Activities

The supplement refers to the final PTMP EIS, which found that, based on the scale of the proposed demolition and construction activities, it is highly unlikely that the conformity applicability threshold would be exceeded by construction activities during any single year of the phased build-out. The current SEIS revises the PTMP, and the construction and demolition emissions projections for the preferred alternative are not provided. The Trust should revisit the conformity issue and provide the emissions projections for construction and demolition activities under the various alternatives, including the preferred alternative.

Response Construction and demolition emissions projections require a high level of detail regarding the planned construction activity, specific equipment, and phasing of the schedule. These details are unavailable at this preliminary stage of development of the alternatives. To demonstrate that the construction and demolition of the alternatives would not cause emissions exceeding the applicability of the general conformity rule, the final SEIS includes the results of a screening assessment using the Urbemis2007 (version 9.2.4) computer model, which incorporates emission factors established by the California Air Resources Board (CARB) as part of the OFFROAD2007 and EMFAC2007 mobile source emission inventory models to provide preliminary estimates. The construction emissions would vary between alternatives and development timelines. For one year involving site preparation and building construction using a crane, three smaller lifts, and eight other pieces of active heavy equipment, construction would cause approximately 20 tons per year of reactive organic gas (ROG), nitrogen oxides (NO_x), and carbon monoxide (CO); 10 tons per year of

particulate matter (PM₁₀); and 1 ton per year of diesel particulate matter (as PM_{2.5}). These emissions would be well under the 100-ton applicability threshold for the general conformity rule.

92 Measures to Minimize the Project's PM 2.5 Emissions Should Be Considered

In December 2008, former EPA Administrator Stephen L. Johnson signed a Federal Register notice making final designations of which areas of the country met or did not meet the 2006 particulate matter National Ambient Air Quality Standards, or PM NAAQS. The San Francisco Bay Area was listed in that notice as a non-attainment area. Although the Federal Register notice has not been published and, therefore, no effective date is yet established for such areas, the Trust should consider measures to minimize the project's PM_{2.5} emissions, and address this in the final SEIS.

Response The federal PM_{2.5} non-attainment designation for the Bay Area Air Quality Management District (BAAQMD) became effective in December 2009. This designation triggered the requirement that the BAAQMD develop formal plans to bring the region into attainment. The BAAQMD is currently developing a regional plan for state-level requirements that would be the foundation for federal-level PM_{2.5} management. To ensure consistency with the BAAQMD 2010 Clean Air Plan, the final SEIS includes mitigation measures for transportation management (NR-21 *Transportation Control Measures*, with a minor update) and feasible engine exhaust control (NR-23 *Construction Equipment Exhaust Measures*).

93 The Trust Should Work with Local Agencies to Develop and Implement TDM Strategies

The supplement indicates that the Trust will continue to implement components of the existing transportation demand management program or adopt more aggressive strategies. Adoption of these strategies would increase shuttle and transit usage and reduce hotspot emissions of air pollutants near sensitive receptors such as schools and child care facilities. The Trust should work with local agencies to develop and implement such strategies.

Response The final SEIS notes the new BAAQMD 2010 Clean Air Plan that was recently adopted. To ensure consistency with the BAAQMD 2010 Clean Air Plan, the final SEIS includes a minor update to the mitigation measure for transportation management (NR-21 *Transportation Control Measures*).

94 Noise Impacts on Crissy Field are not Adequately Analyzed for Alternative 1

The draft SEIS states that an art museum at the Commissary site under Alternative 1 would have no impacts on Crissy Field. The Trust estimates that the art museum and other attractions would draw about 2 million more visitors a year to the Presidio, most of whom would be coming in motor vehicles. Thousands of vehicle trips per year passing by Crissy Field Marsh would create noise from cars, motorcycles, motor scooters, go cars, open air and closed tour buses, and the supply trucks necessary to service the museum and lodge. This noise would have a negative impact on Crissy Field.

Response As the contemporary art museum proposal has been withdrawn from further analysis, there is no need to consider off-site

alternatives for the proposal. Noise conditions at Crissy Field Marsh would not be substantially affected by the alternatives, which would cause the greatest noise increases within the Main Post district and south of Doyle Drive, the dominant noise source. Alternative 2 would increase peak hour traffic entering the Main Post from Crissy Field (via Halleck Street) by about 30 percent, which would result in a peak hour noise level about one decibel louder than that expected for Alternative 1. The one decibel increase would not be a noticeable change.

95 Noise Impacts on the Neighboring Community are not Analyzed Sufficiently

The draft SEIS only considers the impact of traffic-related noise from the perspective of the Presidio proper. Because the nearest residences within the City and County of San Francisco are over 1,500 feet from the Main Post, the draft SEIS assumes they would not be affected and ignores the impact of Presidio inbound and outbound traffic on the neighboring community.

Response The City and County of San Francisco residences nearest to the Presidio gates would be the most affected by inbound and outbound traffic noise under any alternative. The final PTMP EIS (pages 262-263) identified traffic noise levels at the entry gates and noted that existing noise levels at residences near the gates approach or exceed the Federal Highway Administration (FHWA) Noise Abatement Criteria (NAC) of 67 dBA. The Main Post Update (Alternative 2) and other alternatives would not notably increase traffic noise levels at the gates above those shown in the final PTMP EIS. The greatest traffic noise increase at Presidio entry points would occur at the Lombard Gate, where the peak

hour noise level increase would be less than one decibel. This increase would not be perceptible to the human ear.

2.13 HISTORIC RESOURCES

96 Conclusions of the NPS Section 213 Report Should Be Incorporated Into the SEIS

Since the release of the supplement, the Trust has received the Section 213 report drafted by the National Park Service (NPS) for the Advisory Council on Historic Preservation. The analysis in the supplement draws conclusions about the effects of the preferred alternative on historic and archeological resources at the Main Post that are different from the conclusions in the Section 213 report. The supplement currently states that there would be no adverse effect on the National Historic Landmark District (NHLD) as a result of the preferred alternative and states that the NHLD would be preserved. The Section 213 report concludes that the proposed undertaking would have a significant adverse effect on the NHLD because a significant number of character-defining features and resources, including the Main Post and the El Presidio archeological site, would be adversely and irretrievably affected. The Trust's analysis should be updated to reflect the findings of the Section 213 report.

Response Analysis contained in the Section 213 report has been incorporated into the final SEIS. Both the Presidio Trust's draft and final Finding of Effect for the Main Post Update (MPU) and the NPS Section 213 report, dated April 6, 2009, determined that the preferred alternative as detailed in the February 2009 MPU would diminish the integrity of individual resources within the Presidio and would result in a cumulative adverse effect on the National Historic Landmark District. As a result of

an extensive National Historic Preservation Act (NHPA) Section 106 consultation and comments received during the NEPA process, the Trust modified the original proposed action and subsequently identified preferred alternative, and has now analyzed a mitigated preferred alternative (final MPU). The final MPU incorporates the majority of the recommendations outlined in the NPS 2009 Section 213 report. The recommendations from the Section 213 report are listed below, along with discussion of how the MPU responds to the recommendations.

Reduce New Construction The 2009 MPU proposed 253,000 square feet of new construction. The final MPU proposes 146,500 square feet of new construction, a reduction of 106,500 square feet.

Retain Buildings 97, 40, and 41 Building 97 would be retained under the final MPU. Buildings 40 and 41 would be removed or relocated in the future in order to interpret El Presidio, only after additional consultation at that time to consider a full range of alternatives to building removal, and to determine appropriate avoidance, minimization or mitigation measures. Other contributing or eligible buildings retained under the final MPU but not specifically mentioned in the Section 213 report's recommendations are Buildings 113, 118 (garages), and 386 (Post Library).

Develop a "Preservation Plan" in Collaboration with the NPS The MPU and support documents accomplish the same goals as a traditional Preservation Plan. The Trust has appropriately documented and analyzed the cultural resources of the Main Post in order to make informed planning decisions and, in some cases, has committed to doing additional analysis (such as historic structures reports or HSRs) where the information could help inform a better preservation outcome. These

documents would be developed with NPS and other signatory and concurring party input. Additionally, the Trust has agreed to aggregate its existing cultural landscape documentation into a Cultural Landscape Report following NPS-28, Cultural Resource Management Guideline.

Eliminate Traffic Lights The final MPU commits to avoiding installation of traffic lights on the Main Post.

Limit New Construction at the Building 93 Site, or Relocate a Museum to the Commissary Site per the PTMP Under the final MPU, no new construction is proposed at the Building 93 site, and non-historic Building 93 would be reused for new park-focused or visitor-serving uses. No new construction is proposed for the Commissary site under the final MPU.

Reduce Footprint, Scale, Massing, and Height of the Proposed Lodge The lodge has been revised to reduce the scale, massing, and height of the new construction and to incorporate adjacent historic buildings into the program. Total new construction has been reduced to 70,000 square feet. New construction in the revised scheme would be broken into separate, smaller buildings to resemble the historic pattern of development on the site, and arranged in a manner that would not create a hard building plane on the east edge of the Main Parade. New buildings would be lower than Buildings 86 and 87, and a historic structures report (HSR) with treatment recommendations would be developed for those buildings and to guide development on the site.

Reduce the Number of Road Closures The final MPU proposes to remove automobile traffic from existing historic streets (portions of Sheridan Avenue and Arguello Boulevard) to improve pedestrian connectivity, accessibility, and circulation. These roads date to the 19th

century and thus were not built for automobile traffic. While removal of cars and asphalt would alter the present-day appearance and function of the contributing resources, features of the rehabilitated roads, including width, alignment, and paving materials, would be historically compatible. This provision would protect the overall historic circulation pattern at the Main Post, return some roads to their pre-automobile function and appearance, and avoid adverse effects on the resources. Additional reviews for these conversions are provided for in the stipulations of the PA-MPU (Appendix B of the final SEIS).

97 Guidelines in the Main Post Update if Followed Would Result in an Adverse Effect on the NHLD

While the guidelines in the MPU are generally based on research and guided by the complex history of the Presidio, there are serious conflicts and contradictions in them. It appears that the basic broad policy and framework issues are based on actual analysis and documentation, but they falter in the individual details relating to new construction or other proposed changes. The guidelines appear to be too lax, and weakened to allow for specific project goals that do not sufficiently relate to or reinforce these broad policies. If followed, they would result in an adverse effect upon the NHLD. Guidelines should simply state that any future development should conform to the Secretary of the Interior's Standards and result in no adverse effect.

Response Projects under the final MPU would have a comprehensive set of design guidelines, both district-wide and site-specific, that would direct the development of each project. The Main Post chapter of the PTMP contains district-wide guidelines such as “ensure that new construction is sited and configured to be compatible with the historic

district.” These PTMP district-wide guidelines remain applicable to all projects under the MPU. Site-specific design guidelines for MPU projects (such as height limits) would follow these district-wide guidelines and would follow further parameters developed during the Section 106 consultation on the MPU (such as square footage caps for new construction, setback requirements, and requirements for orientation of new construction). Additional site-specific guidelines would be developed using historic structures reports (HSRs) for some of the projects under the MPU. Application of these design guidelines would take place throughout project development via multi-step project reviews described in the PA-MPU (Appendix B of the final SEIS). Furthermore, the 2007 Main Post Planning & Design Guidelines will be updated to address the projects described in the MPU and will remain applicable to the district as a whole.

98 Impacts on the NHLD Should Be Fully Evaluated and Alternatives are Inconsistent with the Secretary of the Interior’s Standards

The SEIS is inadequate because it does not fully evaluate the impacts on the NHLD as a whole. Furthermore, Alternatives 2, 2A, and 3 are inconsistent with the Secretary of the Interior’s Standards. The standards clearly permit a historic resource to be given a new use, but they require “minimal changes to the defining characteristics of the site.” They also specify that “new work... shall be compatible with the massing, size, scale, and architectural features” of the historic resources. The issues of “minimal change” and compatibility of the proposed new structures with the historic resources are central in the evaluation of the various alternatives.

Response Potential impacts on individual historic resources and the NHLD as a whole (if applicable) are analyzed for each of the alternatives in Section 3.6 Historic Resources and in Section 3.12 Cumulative Impacts of the final SEIS. Potential adverse effects, such as alteration of a property that is not consistent with the Secretary’s Standards for the Treatment of Historic Properties, have been identified through the parallel Section 106 consultation process under the National Historic Preservation Act and analyzed in the SEIS. While several of the alternatives may result in negative impacts on historic resources, this does not preclude them being analyzed as reasonable alternatives. To the contrary, the NEPA’s “twin purposes” of improving federal decision making and informing the public are accomplished largely through a thorough examination of alternatives.

99 The CAMP Jeopardizes the Integrity of the NHLD

Because the new building as proposed would diminish the integrity of multiple contributing resources and aspects of the historic scene, it would have a significant impact on the historic Main Post and potentially the NHLD. The preferred alternative is not significantly different in this respect from the original proposed alternative. The sprawl and increased hardscape more than offset whatever amount the building height has been reduced.

Response In response to comments, the proposal for a museum of contemporary art at the southern end of the Main Parade has been withdrawn.

100 The CAMP Does not Belong on the Main Post

The proposed museum building is incongruous with the Main Post's unique architectural character, would derogate the Main Post's historic setting, and would jeopardize the integrity of the Presidio NHLD with its dominating, sprawling presence.

Response In response to comments, the proposal for a museum of contemporary art at the southern end of the Main Parade has been withdrawn.

101 The Massing of the CAMP Disrupts the Main Post's Historic Setting

The proposed site of the art museum is an inappropriate intrusion that would disrupt the Main Post's historic setting. As explained in the draft FOE, the art museum at the site would place a large mass of contemporary construction directly in front of Building 100. This would change the contributing building's historic design as a barracks fronting a parade ground in a manner inconsistent with the Secretary's Standards, and result in an adverse effect. Without dramatic alterations to the museum massing, this adverse effect would be impossible to mitigate.

Response In response to comments, the proposal for a museum of contemporary art at the southern end of the Main Parade has been withdrawn.

102 The CAMP Would Interrupt the Rhythm of Open Space and Built Environment and Should Be Relocated Outside the Main Post

The height and breadth of the art museum would intrude upon and detract from the rhythm, scale, and proportion of the Main Post. As stated in the draft FOE, in the location proposed, a large new building would interrupt the rhythm of open space to built environment, thus

changing the character of the Main Post's physical features within its setting that contribute to its historic significance. The draft FOE concludes that the action would be inconsistent with the Secretary's Standards and would result in a direct adverse effect on the Main Parade and surrounding contributing buildings. Without dramatic alterations to the museum design, massing, and location, this adverse effect would be impossible to mitigate and the project should be relocated outside the Main Post.

Response In response to comments, the proposal for a museum of contemporary art at the southern end of the Main Parade has been withdrawn.

103 The Impacts of Outdoor Sculptures Should Be Assessed

The draft SEIS states that the CAMP would install large outdoor sculptures in the historic landscape but does not properly identify and assess the adverse effect. Without identifying how sculpture would be selected for outside display and what the criteria would be for impacts of sculpture on the integrity of the Main Post, the draft SEIS does not support its assertion that the introduction of sculpture would have a neutral impact on the integrity of the Main Post. The SEIS should provide the information essential to properly assess the impacts of the outdoor sculptures.

Response In response to comments, the proposal for a museum of contemporary art at the southern end of the Main Parade has been withdrawn. As such, no outdoor sculptures are currently being proposed for this site.

104 The Lodge Should Not Be Built as Described

Despite the most recent lodge concept modifications, the proposed facility's height, bulk, location, and potential impact on known and unknown archaeological resources would result in adverse effects on NHLD resources. Its scale is out of place and would form a barrier, as opposed to a connection, between the Main Parade and Old Parade grounds. The Trust should re-engage the public on the design, scale, and massing of the lodge. Developing lodging on the Main Post should focus at least largely on reusing existing structures, including Pershing Hall and the Montgomery Street Barracks. There are no objections to using the Building 34 site for lodging if the scale is appropriate. The new building should maintain a similar footprint as the current one.

Response In response to comments received during the NEPA process and Section 106 consultation, the amount of new construction for a lodge has been reduced and design concepts have changed substantially to reflect the scale and footprint of the historic barracks that once lined Graham Street. Impacts on archaeological resources would be avoided or minimized through the development of archaeological treatment plans and design reviews. Additional design reviews involving interested parties and the public would take place as the lodge concept is developed, according to the terms of the PA-MPU (Appendix B of the final SEIS). The lodge on Graham Street may incorporate Buildings 86 and 87. Additionally, the final MPU separately provides for the rehabilitation of Pershing Hall for lodging.

105 New Buildings or Landscaping That Compromise the Qualities of the Main Parade are Inappropriate and Should not Be Considered

The primary distinguishing features of the Main Parade are its openness, its shape, and the relative modesty in scale and design of the buildings that define the parade ground. These features cannot be compromised without severely damaging the cultural landscape. A restaurant on the Main Parade (Alternative 2A) would compromise the openness of the parade ground. The new tree plantings proposed for the northeast side in several alternatives are inappropriate as they would compromise the isolation of the Centennial tree. The two trees should remain the only trees in the area.

Response Historically, the Main Parade was lined with buildings on both sides and the open space was actually narrower than the current seven-acre asphalt parking lot. The Montgomery Street Barracks, which border the northwestern edge of the parade grounds, were noted in the 1993 National Historic Landmark update for being “one of the Presidio's most focal and impressive architectural groupings.” New construction proposed for the Presidio Lodge in the final MPU is not designed to compete with the grand scale of the Montgomery Street Barracks but rather to reflect the group of buildings that once dotted the opposite side. The Centennial and Bicentennial trees would be retained and incorporated into a landscape that complements the historic dimensions of the Main Parade.

106 Traffic Signals May Affect the Presidio's Overall Character and Historic Setting

The SEIS should describe the impact of the proposed installation of traffic signals at many intersections within the Presidio on the overall character and historic setting.

Response The final MPU commits to avoiding installation of traffic signals on the Main Post.

107 The Trust Should Include National Park Service Expertise in Interpreting Historic Features of the Presidio

Interpretation of the Presidio’s natural, historic, and cultural resources is the primary responsibility of the National Park Service (NPS) in cooperation with the Trust.

Response The Trust recognizes the importance of interpreting the Presidio’s natural, historic, and cultural resources for the public. In passing the Presidio Trust Act, Congress found that “the Presidio’s significant natural, historic, scenic, cultural, and recreational resources must be managed in a manner which is consistent with sound principals of land use planning and management...” Consistent with the Trust Act, the Trust continues to work cooperatively with the NPS in “providing public interpretive services, visitor orientation, and educational programs on all lands within the Presidio.” Recently, the Trust and NPS entered into a collaborative agreement to inform future development of a visitor center at the Main Post.

108 Mitigation Measures Relating to Historic Resources Are Vague

There are instances where the cumulative effects assessment relies on mitigation measures that may result from the ongoing Section 106 consultation process. The results of the Section 106 process may not be able to offset the effects of the preferred alternative or its contribution to the cumulative impact scenario. Many of the mitigation measures are lacking in detail because the Section 106 compliance process has not been completed. Until the Section 106 process is complete, the Trust is

unable to project the degree to which mitigation measures might reduce or offset many of the impacts of the preferred alternative.

Response The parallel National Historic Preservation Act (NHPA) Section 106 consultation process has identified measures to avoid, minimize, or mitigate adverse effects to historic resources from the proposals contained in the final MPU. These measures have been incorporated into the PA-MPU (Appendix B of the final SEIS) that resolved the Section 106 consultation. These same measures have also been identified in Section 3.6 Historic Resources of the final SEIS. A Record of Decision memorializing the Trust’s determinations for the Main Post will fully account for the provisions of the Section 106 consultation and the effect of the proposed project on historic properties as described in the PA-MPU.

2.14 ARCHAEOLOGY

109 The Impact on El Presidio Cannot Be Fully Assessed

Neither the Trust nor the NPS has ever conducted investigations that are sufficient to define the boundaries of the El Presidio archaeological site. Hence, while the Trust claims that the preferred alternative includes modifications designed to avoid the northern and western extents of El Presidio, no archaeological evidence has been provided to substantiate that claim. Because the full extent of the El Presidio site is unknown, the impact of the preferred alternative on this unique archaeological resource cannot be fully assessed.

Response The archaeological remains of El Presidio not only consist of architectural elements but also reflect the many and various ways the colonial community of up to 400 people worked and manipulated the

surrounding landscape. Outside the immediate vicinity of El Presidio's walls, the site is discontinuous, composed of myriad elements such as work yards, corrals, gardens, trash pits, and labor camps that are separated from others. It therefore follows that a uniform boundary for El Presidio is very problematic to define. The 2008 NHL update expanded the area of El Presidio, especially in the northern and eastern directions; this expanded area envelopes the site within a buffer that extends to include known intact features and other areas where adjacent remains are predicted. Site-specific testing around El Presidio was sufficient to determine impacts of the History Center (Alternative 3) and the CAMP (which has since been withdrawn from further consideration) and affirmed the northern boundary in the area south of the reduced lodge footprint under the mitigated preferred alternative (Alternative 2).

110 Studies are Insufficient to Adequately Identify and Assess Archaeological Resources That may Be Affected by the Lodge

Studies to date do not support the Trust's conclusion that the proposed lodge site is located outside of El Presidio. Recent studies found Spanish colonial/Mexican-era artifacts within or adjacent to the proposed site, and are not adequate to assess the presence/absence or integrity of Spanish-colonial/Mexican archaeological resources within the area that would be affected by construction of the lodge.

Response Much of the proposed lodge would overlap with and replace the footprint of existing Building 34; therefore, archaeological testing for the lodge consisted of 250 linear feet of excavation within the area of proposed construction south of Building 34. Three trenches were placed at the southern end of the proposed footprint and one trench was placed within the northern extent of the site of El Presidio as identified in 2008.

These four excavations were designed to further identify F:9 United States Quadrangle West Side and to provide additional data for the northern boundary of El Presidio. A variety of archaeological deposits consistent with F:9 still exist. The southernmost trench, placed within the boundary of El Presidio, recovered several artifacts and features consistent with F:1 El Presidio. Because these findings correlated with previous archaeological models, the Trust concluded that further destructive testing was unnecessary to understand environmental consequences and to make an assessment of effect. In the mitigated preferred alternative, the lodge has been reduced in size and sited farther from El Presidio as identified in 2008 and based on the recent archaeological testing.

111 Parking and Traffic Patterns Would Prevent Long-Term Interpretation and Research at El Presidio

The Trust should not be planning to use the *plaza de armas* site for over 20,000 square feet of parking spaces. The Trust justifies the removal of Buildings 40 and 41 by arguing that their removal is necessary to interpret the plaza. But these two historic buildings, which are contributing elements to the NHL, each cover an area of only 4,410 square feet per building, or a total of 8,820 square feet (only a third of the area that the Trust proposes to dedicate to parking within the plaza). The Trust is making parking a priority over protection of significant historic resources. Any management plan for the Main Post should remove all parking from the historic plaza of El Presidio to facilitate research, preservation, and public interpretation of this significant archaeological resource.

Response The Trust has made interpretation a priority over parking at El Presidio and would reduce parking on El Presidio from 252 to 75 daily spaces. Furthermore, the Main Post Update provides for occasionally closing the *plaza de armas* to all traffic and parking to facilitate commemorations, excavation, and other public programming.

112 The Trust's Approach to Archaeological Mitigation Is of Concern

The SEIS generally assumes that archaeological resources that may be affected by the preferred alternative are eligible under Criterion D. Along these lines, the mitigation measures identified by the Trust focus on either avoidance or recovery of information from archaeological resources that may be disturbed or destroyed by actions taken under the preferred alternative. Mitigation measures geared toward data recovery are not by themselves sufficient for archaeological resources that are eligible for listing on the National Register of Historic Places (NRHP). The Trust should evaluate each known and predicted archaeological feature that may be affected by the preferred alternative with regard to all the NRHP criteria, and develop mitigation measures as appropriate.

Response The NPS and Trust have evaluated the predicted and known archaeological features of the NHLD. The archaeological management assessment developed early in the design process for each project described in the mitigated preferred alternative will determine if further site-specific evaluations are necessary to determine appropriate treatments. The archaeological mitigation measures can be used individually or in tandem with other mitigations and represent the range developed in consultation with consulting parties to the Section 106 process under the NHPA.

The following discussion summarizes comments received on each mitigation measure, followed by the Trust's response.

- **Mitigation Measure AR-1 *Avoidance***

Although the Trust states that its first priority for mitigation would be avoidance of adverse effects, the SEIS states that archaeological features would be adversely affected by the lodge and museum identified in the preferred alternative. If the Trust is serious about avoiding adverse effects on archaeological sites, it should more aggressively pursue reuse of existing structures and identification of construction sites that are not located within or in close proximity to known archaeological resources.

Response The art museum proposal has been withdrawn and the potential impacts on the western extent of F:1 El Presidio, therefore, would be avoided. In the mitigated preferred alternative, the lodge has been reduced in size and positioned farther from the site of El Presidio as delineated in the 2008 NHLD update and based on recent archaeological testing. Historic Buildings 86 and 87 may be incorporated into the scheme for the proposed lodge, and other historic buildings (e.g., Building 42, Pershing Hall) would be rehabilitated separately to accommodate lodging.

- **Mitigation Measure AR-2 *Archaeological Research Design***

This measure leaves open the question of whether or not site-specific archaeological research design(s) will be prepared for the new Main Post projects. The Main Post Archaeological Research Design cannot be substituted for a site-specific, project archaeological research design since it does not address site-specific impacts.

Response The Archaeological Research Design for El Presidio and the Main Post (titled Revelar) serves as the foundation to support archaeological excavation and the framework to add further avenues of inquiry and site-specific details as necessary. The PA-MPU (Appendix B of the final SEIS) describes a review process for Revelar and treatment plans that would add site-specific information to the research design.

- **Mitigation Measure AR-5 *Alternative or Creative Mitigation***

This measure creates a bad loophole that would allow the Trust to expedite construction activity at the expense of archaeological resources. The Trust should commit to a proactive planning process for new construction in archaeologically sensitive areas that acknowledges the likelihood of encountering deeply buried archaeological resources and plans accordingly for that likelihood. Otherwise, alternative mitigation could lead to the loss of unique and incomparable archaeological resources that provide entirely new and unparalleled sources of information about the history of the Presidio. If the cost of mitigation is too great, then the project should be redesigned for avoidance.

Response In the final SEIS, the mitigation measure has been renamed and modified to avoid confusion. This measure is meant to be used in tandem with data recovery, not in lieu of it. The measure is not designed to avoid costs, as was implied in the question. This mitigation serves to amplify the public benefit from the recovery of important information.

113 Consultation with Affected Native American Descendent Communities Has Been Inadequate

Consultation with Native American individuals and groups was initiated extremely late in the process, long after the Trust had identified the

preferred alternative. The Trust should expand its Native American consultation program for the Main Post to include all Native American groups whose heritage is connected with the Main Post, prehistoric and historic.

Response The Trust consulted with representatives of Native American groups identified by the California Native American Heritage Commission as having knowledge of cultural resources in the project area and City and County of San Francisco during the identification/assessment phase of the consultation. Research by Trust archaeological staff and their consultants, including archival research, GIS analysis, and geo-archaeological assessments of Presidio soils and sediments, suggests that there are no anticipated project-related ground disturbances in areas that have known sensitivities to Native American archaeological sites. Nevertheless, the Trust conducted outreach via phone, letter, and email to representatives of these groups and has incorporated comments from that consultation into the PA-MPU (Appendix B of the final SEIS).

2.15 VISUAL RESOURCES

114 More Detailed Renderings of Proposals are Needed

The supplement does not provide any meaningful simulations or architectural renderings of the proposed new museum and lodge buildings. Only outlines of the proposed buildings, devoid of any details regarding surface, massing, or architectural style, are provided. These renderings seem to understate the visual impacts of the proposed buildings on the Main Post. This is troubling, particularly when comparing outline renderings with the renderings provided for

Alternative 2, which are more detailed and specific. Please provide more detailed renderings of the proposals to help the public understand their full visual impact.

Response The simulations contained in the final SEIS have been improved to display more information. The previous “wireframe” technique is not used; instead, volumetric shapes with color and a limited amount of detail are now shown to allow the public to better understand the potential effect on the visual setting of the Main Post.

115 The Lodge Creates a Visual Barrier and Changes the Historic Character of the Main Post

The 480-foot-long, box-shaped, flat-roofed lodge would become a massive visual barrier between the Old and the Main Parade grounds, as opposed to providing a connection between the two areas. The lodge would be very intrusive visually and would dramatically change the character of this historic area, not preserve and enhance it.

Response In the mitigated preferred alternative (Alternative 2), the design of the lodge has been changed to reflect the footprint of historic barracks that once occupied the site. Each of the separate structures would be a small two-story building with a gabled or hipped roof. This revised design is more in keeping with the proportions of the surrounding historic buildings and more compatible with the historic Graham streetscape than designs previously proposed for this site. The revised design also incorporates spaces between the buildings ranging from 10 to 20 feet in width. By reducing the size of the individual buildings and by maintaining spaces between them, a “massive visual barrier” would be avoided and future views through the lodge site would be increased. Because the layout of the lodge would be generally based on the historic

pattern of buildings previously built on Graham Street, it would preserve and enhance the historic character of the Old Parade.

116 The Architecture of the Art Museum and Lodge Should Be Compatible with the National Historic Landmark District

The design of the art museum and the lodge are not compatible with the National Historic Landmark District. Without mimicking the historic buildings, any new building should include or at least embrace their hallmark characteristics, including color, rooflines, and style. The designs of the art museum and the lodge, as proposed, fail to accomplish this. These structures would be inconsistent with the stated design guidelines, in that they would not be responsive to the surrounding site configuration and adjacent open spaces, and would not be compatible with the massing, size, and scale of the surrounding historic buildings.

Response The contemporary art museum proposal has been withdrawn from further consideration. Additionally, under the mitigated preferred alternative (Alternative 2), the size and design of the lodge have been modified to reduce potential impacts. The new design separates the lodge into small-scaled buildings with a layout generally based on the historic pattern of buildings previously built on Graham Street. With these changes to the design, the lodge would be responsive to the surrounding site configuration and adjacent open spaces and would be compatible with the massing, size, and scale of the surrounding historic buildings.

117 A Visualization of the Anza Esplanade and Presidio Lodge Is Needed

A mockup or renderings of the Anza Esplanade and the lodge is needed so that one can visualize the cumulative impacts on Main Post of both

projects in terms of the seven characteristics of historic integrity. How do the mass, height, scale, association, etc. of one project combine with the other? How crowded will the pedestrian feel from the proximity with the hotel? Are outdoor tables from the hotel next to the Anza Esplanade permitted?

Response The PA-MPU would guide the development of designs for the lodge. The design concept under consideration for the lodge takes into account the design concept and function of the Anza Esplanade. At this time, both projects are in the concept phase. Decisions regarding details such as construction materials, site furnishings, and plantings have not yet been made. The best representation of how the two projects might look together can be found in the district-wide rendering in the MPU; additional graphics are in the PA-MPU. Both projects would be subject to additional design review, which would consider the height, organization, and massing of the lodge on the site, the relationship between the two projects, and other factors. Constraints for the lodge are described in the Project Descriptions section of the MPU, which corresponds with the PA-MPU. A concept diagram for the Anza Esplanade is also included as in the PA-MPU in order to serve as a starting point for further design discussions. Designs for both the lodge and the Anza Esplanade would be directed by the Main Post Planning and Design Guidelines, Cultural Landscape Report, and further consultation among parties to the PA-MPU and the public.

2.16 VISITATION

118 Additional Information on Visitor Use and Experience Should Be Provided

The enhancement of the visitor experience at the Main Post is one of the key objectives of the undertaking and should be analyzed in a manner similar to what was in the final PTMP EIS. This would then enable the reader to compare and reflect upon the impacts of the alternatives on overall visitor experience within a national park environment.

Response Section 3.9 Visitation was revised to clarify the changes in visitor facilities and programs under each alternative and the impact that the projected numbers of visitors would have on the visitor experience. The methodology and analysis of visitation levels in the Main Post Update are consistent with the approach used in the final PTMP EIS.

119 Visitation Impacts are Based on Inadequate Information, Improper Comparisons, Inaccurate Presentations of Data, and Faulty Methodology

The visitation, traffic, and parking estimates do not take into account seasonal variations in attendance at the Main Post buildings. The CAMP estimates are too low, while several of the other building estimates appear unsupported or too high.

Response All visitation estimates are estimates of the total number of visitors each year. Average annual daily visitation was also calculated for each alternative, but only for the purposes of comparison among alternatives. The calculated average annual daily visitation was not used in any analysis, and to eliminate confusion about its intended purpose, the average annual daily visitation estimate has been deleted from the final SEIS.

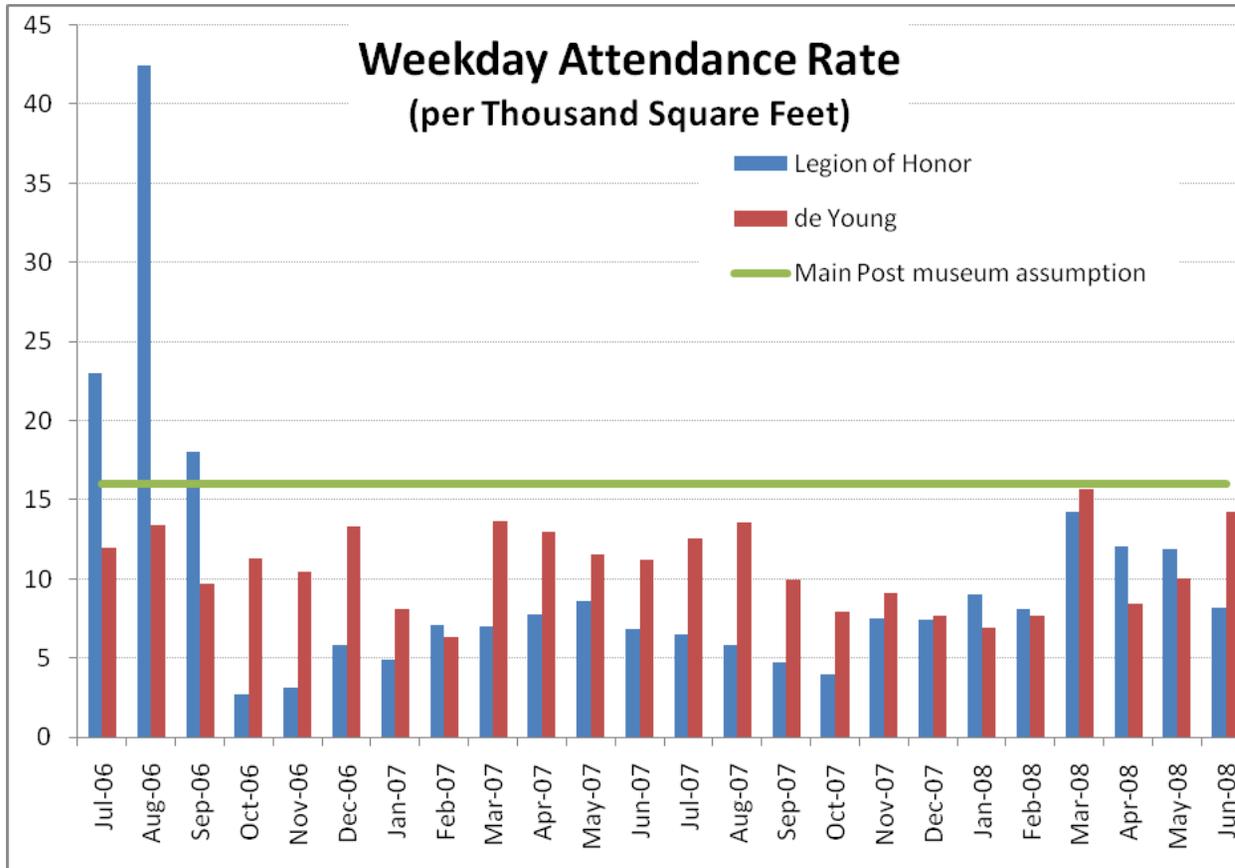
The visitation estimates for the CAMP (formerly part of Alternative 2) and History Center (Alternative 3) were those provided by the project applicants in their respective proposals. These visitation estimates were checked against the annual visitation per thousand square feet from at the de Young Museum. The de Young Museum is approximately 300,000 square feet (in floor area) and attracted between 1.1 and 1.2 million visitors in 2007, for a derived annual visitation rate of 3.6 to 4 annual visitors per thousand square feet of floor area. The proposed 100,000-square-foot (gross exterior square footage) museum of contemporary art was assumed to attract 300,000 to 400,000 visitors per year and the 50,000-square-foot (gross exterior square footage) History Center was assumed to attract 150,000 visitors per year. These visitation estimates are generally consistent with the rates derived from the de Young Museum. Since the visitation estimates are on an annual basis and they were checked against annual visitation to the de Young Museum, the estimates include day-to-day variability and seasonal peaks in attendance.

Traffic estimated for the CAMP (formerly part of Alternative 2) and the History Center (Alternative 3) in the draft SEIS and final SEIS is not based on annual estimates divided by days in the year, as asserted by the commenter. The weekday trip generation rate used for these projects reflects a typical peak day. The chart below provides a comparison of the assumed attendance rate (person round-trips per thousand square feet) for the history center compared to average weekday attendance rates for the Legion of Honor and the de Young Museum by month over the past two years. The assumed trip generation rate for the history center is 32.1 two-way (or 16.05 round-trip) person trips per thousand square feet, and is well above the average monthly weekday attendance for these two museums, with the exception of the Monet exhibition at the Legion of Honor.

Annual visitation estimates for specific projects (e.g., Presidio Lodge, History Center, YMCA Fitness Center) at the Main Post were used when available. In the draft SEIS, in order to estimate visitation for non-specific uses (e.g., cultural/educational space), the daily trip generation rates were multiplied by approximately 330 days per year to determine visitation to general uses. This same approach was used for retail uses and restaurants. A later comparison of restaurant visitation assumptions to actual restaurant activity in the Presidio revealed that this approach grossly overstated the number of restaurant visitors, likely because the restaurant use trip generation rate reflects a busy Friday rather than a slower-paced Tuesday. Similarly, a comparison of this methodology to visitation and attendance rates for less intensive cultural/educational uses (e.g., the International Center to End Violence) indicated that visitation for these non-specific uses was also grossly overstated. Appropriate adjustments were made to the preferred alternative in the supplement to the draft SEIS. These same adjustments have also been made to all alternatives in the final SEIS.

120 The Art Museum Proposal Has No Relation to the Presidio's History

As a military base under the flag of several nations, units stationed at the Presidio have responded to continuing national and local priorities. The Trust does have plans to protect the Presidio's underlying historic resources, and in cooperation with the NPS, to provide related interpretation and education programs for the visiting public. However, building a major new museum (CAMP) with contents that have no relation to the Presidio's history would not contribute to the public appreciation or understanding of the national park and historic landmark district.



Response The mitigated preferred alternative (Alternative 2) no longer includes a museum of contemporary art on the Main Post.

2.17 RECREATION

121 Removal of Recreational Facilities Should not Occur Without Plans for Replacement

The removal of the bowling alley, tennis courts, YMCA, and adult health care and child care buildings should not occur without specific plans for replacement. If the Trust is going to remove these buildings, the Trust and the developer should move those tenants with no cost to the tenants

and re-rent to those tenants on the same terms and conditions as their old leases (same price per square foot).

Response The Trust will make every effort to find suitable space to relocate existing tenants and their programs. However, the Trust is not in a position to underwrite the capital improvements, and must ensure that tenants can demonstrate the overall feasibility of their proposals. The impacts of the removal of the recreational facilities on recreational use and activities are discussed in Section 3.10 of the final SEIS.

122 All Tennis Court Gates Should Be Open for Public Use

Tennis courts gates are locked and only the YMCA has keys to open and use these courts. These are public courts and should be made available to anyone who wants to play regardless of special exceptions made to the YMCA for their exclusive use. The Trust cannot deny access to public courts paid by public money just because the Trust worked out a deal for increased fee income from the YMCA.

Response To make the park accessible to a wide range of programs, the Trust must rely on partnerships, including that with the Presidio Community YMCA, to provide those programs. Creating a dynamic national park that offers appropriate recreational programs requires considerable external support.

2.18 WATER RESOURCES

123 The Water Resources Analysis Is Inadequate and Unsubstantiated

Thick willow stands indicating shallow groundwater are present at the site above the art museum location for Alternative 2A. A spring adjacent

to the tennis courts at Infantry Terrace still flows. This information is in contrast to the draft SEIS assertion that groundwater is anticipated to be 50 feet below the existing surface. It is suggested that “perched” groundwater is identified at 26 feet below the surface. The draft SEIS should support the assertion that groundwater is actually perched as differentiated from subsurface hydrology. The draft SEIS should identify the geotechnical investigations referenced and the locations of these investigations.

Response The water resources analysis in Section 3.11 Water Resources of the final SEIS has been updated to include the wetland located in the vicinity of the Infantry Terrace tennis courts. The limits of the wetland are identified in the Presidio wetland resources report dated April 2003. This wetland is the likely source of headwaters for the stream that originally flowed through the Main Post area and contributes to the perched groundwater encountered in the test borings. The wetland would remain undisturbed under all alternatives.

Section 3.11 Water Resources of the final SEIS identifies the investigations and geotechnical studies that encountered subsurface water. The relevant reports are available in the Presidio Trust Library.

124 Significant Impacts to Hydrology Would Occur Contrary to Draft SEIS Assertions

Data from Trust investigations indicate that significant impacts could occur from the proposed action to hydrology. The “Draft Cut and Fill Map 1871-2000” indicates a fill thickness of about 25 feet at the art museum sites for Alternative 2 and 2A, and suggests a steadily decreasing depth (much less than 50 feet) of the former stream ravine towards the south and under the museum sites in Alternatives 2 and 2A.

This 10- to 18-foot depth is consistent with the spring north of the tennis courts and the willow stands just to the south of the Alternative 2A art museum site. These data suggest that the assertion that the “groundwater is anticipated to be 50 feet below the existing surface” is incorrect and that the hydrologic analysis is therefore faulty.

Response The water resources analysis in Section 3.11 Water Resources of the SEIS has been updated to include the wetland located near the Infantry Terrace tennis court and to better describe the groundwater table experienced at 50 feet below ground surface and the perched groundwater experienced at 18 to 25.5 feet below ground surface. This wetland is the likely source of headwaters for the stream that originally flowed through the Main Post area and contributes to the perched groundwater encountered in the test borings. Improvements constructed at the Presidio Lodge site (Alternative 2) and History Center site (Alternative 3) would affect the perched groundwater. These impacts are expected to be localized as the groundwater would flow around the below-grade structures. Below-grade structures would require waterproofing to prevent seepage but would not require an active dewatering system.

125 Springs North of Infantry Terrace Tennis Courts Should Be Investigated

The draft SEIS should investigate the springs that come to the surface and the possible wetland area to the north of the Infantry Terrace tennis courts and the wetland’s connection to the now-buried creek.

Response The location of the Infantry Terrace wetland has been added to the water resources analysis in Section 3.11 Water Resources of the final SEIS.

126 Stormwater Options Should Be Investigated

The draft SEIS should analyze options other than directing stormwater to the combined sewer system and should determine the impact on the wet weather capacity of the city’s combined sewer system.

Response The Main Post has separate stormwater and sanitary sewer systems. Stormwater from the Main Post district is directed to the bay through either direct outfalls or Crissy Field Marsh. The analysis has been updated to clarify this point. Additionally, the SEIS mitigations include incorporation of recommended Best Management Practices during projects implementing the Main Post Update to reduce stormwater runoff and improve water quality.

127 Other Types of Low-Water Impact Plantings Should Be Studied

Low-water impact plantings should emphasize climate-appropriate and wildlife-useful vegetation for the greening of the Main Post rather than solely an expansive lawn.

Response During planning for the Main Parade, many different treatments and design features were considered, reviewed with the public, and ultimately rejected as incompatible with the goals of the project. Drought-tolerant trees and massed shrub plantings were ruled out as incompatible with the historically open character of the site. Other more drought-tolerant ground covers and native grasses were ruled out as they are not compatible with public use of the space. The Main Parade will incorporate a state-of-the-art, water-efficient irrigation system that is plumbed to use recycled water. It will be planted with a turf grass that is moderately drought-tolerant, non-invasive, and durable, and will be maintained in a fashion that is consistent with the Trust's integrated pest management program.

128 Increases in Sewage Flow to the City System Should Be Determined

The draft SEIS does not adequately determine the volume of additional flow of wastewater from the proposed action to the city's combined sewer system and the impact of the additional volume on the available storage capacity for wet weather flows. The draft SEIS should identify actions that would respond to capacity impacts of the project.

Response The sewage generated by all alternatives is discussed in Section 3.13 Other Impacts ("Water Supply and Wastewater" subsection) of the final SEIS. Estimates are consistent with the flows evaluated as part of the PTMP. Using the usage factors included in the PTMP, Alternative 2 would produce approximately 5 percent more wastewater than Alternative 1, or an approximately 7,700-gallon-per-day increase. This increase would represent an approximately 1-percent increase in Presidio-wide wastewater flows and would be well within the existing system capacities. Additionally, wastewater generated from the Main Post would be tributary to the proposed recycled water treatment plant, which would mitigate any impacts on the city's combined sewer system.

129 Water Demands Should Be Identified

The draft SEIS does not adequately identify the amount of additional water demand for the proposed action and whether this amount is consistent with previous projections made for the San Francisco Public Utilities Commission (SFPUC) plan. The draft SEIS should analyze the amount of water used on the greening of the Main Post and by the 2.4 million visitors in Alternative 2. Since no water reclamation plant has been built, and there is no assurance that one would be built, water to green the Main Post's open space would be shipped from Hetch Hetchy Reservoir to supplement water from Lobos Creek. The draft SEIS

should identify impacts on the Tuolumne watershed from the proposed action.

Response The projected domestic water demand is discussed in the Section 3.13 Other Impacts ("Water Supply and Wastewater" subsection) of the final SEIS. Water demand from Alternative 2 would be slightly higher than demand from Alternative 1, representing an increase of approximately 5 percent.

The Trust produces approximately 80 percent of the domestic water used at the Presidio from local resources (Lobos Creek Water Treatment Plant). The impact of Alternative 2 on the Tuolumne watershed would be negligible, as the expected increase in domestic water demand would be nominal and would be primarily met by local sources.

The irrigation demand for the greening of the Main Parade was evaluated as part of the Main Parade EA. As discussed in the EA, the SFPUC identifies the Presidio as an "in-city customer/non-residential" and therefore historical water use and projected water demands of Area B are included in its Urban Water Management Plan. These projections are based on the City and County of San Francisco Planning Department's Land Use Allocation 2002, which takes into account projected future development within the Presidio. Because the Presidio is a retail customer, the purchase and use of water from the SFPUC are subject to the SFPUC's water shortage regulations, including mandatory water rationing programs and rate structures adopted during drought conditions

The Trust is committed to reducing the demand for off-site water resources by conserving water and by implementing water recycling in northern and eastern sections of the park (see PTMP, page 55). Since beginning the project to build a recycled wastewater treatment plant in

2001, the Trust has completed project planning and environmental review; obtained a permit for the treatment, distribution, and use of recycled water from the Regional Water Quality Control Board; substantially completed the project design; and is in the process of engaging project partners to execute the project. The Main Parade would be served by the recycled wastewater treatment plant.

130 Impacts from Emerging Contaminants Found in Reclaimed Water Should Be Assessed

If reclaimed water is used to green the Main Parade, the draft SEIS should study the impacts on the environment from the emerging contaminants that pass through the treatment process. The draft SEIS should analyze the nature, extent, fate, and transport of potential contaminants that are released to the environment by reclaimed water.

Response Emerging contaminants, a collection of compounds consisting of trace amounts of pharmaceutical and personal care products, were evaluated in the Water Recycling Project EA in 2001. As discussed in the EA, trace amounts of these compounds in the recycled water would not adversely affect landscape irrigation or any other proposed uses of the recycled water at the Presidio and would not be expected to adversely affect groundwater quality. Furthermore, the Trust committed to keeping abreast of research in this area as this was a new area of concern.

Since 2001, emerging contaminants have been the focus of much research due to their potential impacts on human and environmental health. Based on the available scientific research, emerging contaminants in recycled water used for irrigation are expected to result in minimal human health risk due to the extremely low levels of these compounds in the plant effluent and the low levels of exposure that are

expected from use of areas irrigated with recycled water (i.e., picnicking, children playing, sports participation). Application of recycled water at rates to support drought-tolerant grasses would minimize the potential transport of any residual compounds into nearby groundwaters.

Additionally, the State Water Resources Control Board recently adopted a Recycled Water Policy with the purpose of promoting the beneficial use of recycled water. As part of this policy, the State Water Resources Control Board established a blue ribbon committee to look into emerging contaminants (referred to as constituents/chemicals of emerging concern [CEC] in the policy) and specifically monitoring requirements. The committee was tasked with looking into specific questions related to CEC in recycled water:

- What are the appropriate constituents to be monitored in recycled water, including analytical methods and method detection limits?
- What is the known toxicological information for the identified constituents?
- Would the constituents change based on level of treatment and use?
- What are possible indicators that represent a suite of CECs?
- What levels of CECs should trigger enhanced monitoring of CECs in recycled water, groundwater and/or surface water?

The Trust will continue to keep abreast of the blue ribbon committee's activities and will comply with any of the committee's findings that are incorporated into the Trust's permit from the Regional Water Quality Control Board.

131 Site-Specific Impacts of Main Post Bluff Underground Parking Should Be Evaluated

The SEIS defers analysis and environmental review of groundwater impacts associated with underground parking at the north end of the district. Site-specific analysis and environmental review should be conducted for alternatives that include new underground parking at the north end of the district. The potential impact on groundwater discharge to Crissy Marsh is of particular concern.

Response The CEQ NEPA regulations encourage federal agencies to “tier” their NEPA analyses to avoid repetition of issues and to focus on the issues for decision at each level of review, as is the Trust’s practice and as has been done in the final SEIS. Because there is no site-specific proposal for underground parking at the Main Post bluff, groundwater impacts are too broad to analyze properly for any meaningful consideration. Based on information developed for the Doyle Drive tunnel within the bluff area, however, underground parking would most likely contain standard drainage features (i.e., a permeable gravel envelope or strip drains) around the structure so that groundwater would be expected to flow easily from the northern areas, under the parking, and toward the bay without being impeded.

2.19 CUMULATIVE IMPACTS

132 The Cumulative Total Impacts Should Be Assessed

The draft SEIS should assess the effect of one environmental consequence on another and determine the grand sum total effect of the increments. Various environmental effects are identified, but there is no detail regarding the incremental effects of the one on the other.

Therefore, there has been no assessment of the cumulative total impacts. Further, there is no catalog of past, present, and future contemplated other projects and programs in order to assess their environmental impacts. Simple conclusory statements that there will be cumulative impacts are not adequate descriptions or determinations of cumulative impacts because they do not permit the public (or the Trust) to properly know what the cumulative impact would be, in kind, and/or extent.

Response The commentor is referred to Section 3.12 Cumulative Impacts in the final SEIS. The section tiers from the final PTMP EIS, which provided the context for the discussion and is summarized therein, and enumerates 10 past, present, and reasonably foreseeable actions, including projects by other agencies (i.e., Doyle Drive reconstruction) that were specifically considered in the analysis and are shown on Figure 37. These projects were based on scoping and specifically “cataloged” by the Trust¹⁵ as relevant and useful to the cumulative impact analysis because they could have a significant cause-and-effect relationship with the direct and indirect effects of the mitigated preferred alternative and other alternatives. Specific resources that were discussed included the following: land use, transportation, parking, air quality, noise, historic resources, archaeology, visual resources, visitation, recreation, and water resources. No “simple conclusory statements” were given, but rather, sufficient (and for most resources, quantitative) information commensurate with the impacts of each action was presented

¹⁵ CEQ does not require agencies to catalog or exhaustively list and analyze all individual actions. The Trust did provide such an inquiry in its cumulative impact analysis, however, to “count what counts” to inform decision-making.

to confirm that the cumulative effects of the mitigated preferred alternative, as well as the other alternatives, did not reach a point of significant environmental impact with the exception of historic resources and archaeology, for which additional detail was provided.

133 A Cumulative Impact Report Is Required

A “cumulative impact report,” complete with pictures, maps, models, and whatever illustration is appropriate, is needed to show what the Main Post would look like after all the proposed projects are built out.

Response A complete picture of all past, present, and reasonably foreseeable actions, including rehabilitation of the Main Parade and projects by other agencies (i.e., Doyle Drive reconstruction) that could reasonably be expected to occur within the Main Post Update time period and that are specifically considered in the SEIS cumulative impact analysis are shown on the Illustrative Plan within the Main Post Update and in Figure 37 in the final SEIS.

Projects not specifically anticipated in the PTMP that were subject to Section 106 consultation include: El Presidio; the archaeology lab and curation facilities; new construction for a Presidio lodge; rehabilitation of the Presidio Theatre and construction of an addition; rehabilitation of the Presidio Chapel and construction of an addition; and improvements to pedestrian access and parking. These projects are further described in the Project Descriptions chapter of the Main Post Update, which provides conceptual renderings and site plans, planning concepts, project parameters, and other details. The Main Post Update, plus other identified projects useful and relevant to the analysis, provide the “big picture” view required by NEPA and form the basis for the SEIS cumulative impact analysis.

Cumulative effects to the Presidio of San Francisco National Historic Landmark (which constitutes the area of potential effect, or APE, for the purposes of Section 106 review) were assessed in the final finding of effect (FOE), released in July 2009. Those effects were resolved through continued consultation, including the avoidance, minimization and mitigation of resource-specific and cumulative adverse effects, and provisions for further consultation and documentation under the PA-MPU (Appendix B).

134 Cumulative Impacts Should Be Spelled Out for All Alternatives

There is no identification and assessment of and differentiation between the incremental impacts of the proposed action/preferred alternative and the other reasonable alternatives.

Response The analysis in Section 3.12 Cumulative Impacts in the supplement determined that the incremental impacts associated with the mitigated preferred alternative, as well as with all other alternatives, are not expected to be significant, with the exception of historic resources and archaeology. In response to the comment, for those cumulative impacts that were quantifiable, the cumulative analysis in Section 3.12 Cumulative Impacts of the final SEIS has been revised to present the range of impacts that are reasonably foreseen in order to address the relative effects of the alternatives, while still avoiding duplicative discussion.

135 The Cumulative Impact Evaluation Should Analyze Expansion of Crissy Field Marsh

Under Alternative 1, the art museum would be relocated to the Commissary. However, the Crissy Marsh expansion project is missing

from the cumulative impacts section. The draft SEIS should include and analyze the impacts of the proposed undertaking in Alternative 1 on the Crissy Field Marsh expansion project, despite the inclusion of the Crissy Field Marsh Expansion Technical Study, Letter of Agreement in the PTMP.

Response The Crissy Field Marsh Expansion Study, completed in March 2004 and available for review on the Trust's web site, considered a broad array of options to achieve long-term ecological viability of Crissy Field Marsh. The purpose of the study was not to develop alternatives but to provide a broad set of feasible options to inform a later environmental review process. At this time, the only project that would have a bearing on the marsh is the revitalization of Tennessee Hollow at its downstream end (the Quartermaster Reach), which would allow for expansion of the marsh south of Mason Street. The Quartermaster Reach project is considered in the cumulative impact analysis in the final SEIS.

136 Transportation and Parking Cumulative Impacts are Severely Discounted

There appears to be no consideration of the development contemplated for Mason Street, the expansion of activity at the north end of Crissy Field, the relocation and expansion of the YMCA at the Commissary, and the increase in cyclists.

Response Buildings along Mason Street were assumed to be occupied in the PTMP. Since the transportation analysis in the SEIS tiers from that in the PTMP EIS, these buildings were also assumed to be occupied in this analysis, with the exception of the Doyle Drive project's demolition of Buildings 605 and 606. As discussed in Section 3.3 Transportation and Parking, the specific travel characteristics for the recent new uses in the northern portion of Crissy Field have been substituted for the less

specific land use characteristics assumed in the PTMP EIS, as have specific changes related to the restaurant on Ruger Street and subleasing activity at the Letterman Digital Arts Center.

Relocation and expansion of the YMCA Fitness Center at the Commissary is not considered as part of the Main Post Update. For the purposes of the SEIS analysis, the YMCA Fitness Center is assumed to remain in Building 63 in the Main Post. If the YMCA Fitness Center were to consolidate uses and relocate to another area of the park, the project would be subject to additional environmental review.

137 Cumulative Impacts on the Integrity of the NHLD Should Be Assessed

There is no doubt that the Presidio's high degree of integrity has been eroded over recent years. The anticipated projects would substantially exacerbate this erosion, potentially to an unacceptable level. The NPS has warned that the cumulative impact of the proposed developments severely diminishes the historic character of the Main Post, and significantly diminishes the overall integrity of the NHLD. The assessment of the cumulative effects of the preferred alternative, therefore, should include reasonably foreseeable impacts on the integrity of the Main Post as well as the whole NHLD.

Response The Presidio Trust's final Finding of Effect for the Main Post Update (July 2009) contained a thorough analysis of the potential impacts on individual contributing resources as well as on the National Historic Landmark District as a whole and determined that the preferred alternative as detailed in the February 2009 Main Post Update would diminish the integrity of individual resources within the Presidio and would result in a cumulative adverse effect on the National Historic Landmark District. As a result of an extensive National Historic

Preservation Act (NHPA) Section 106 consultation and comments received during the NEPA process, the Trust modified the preferred alternative and has now analyzed a mitigated preferred alternative (Alternative 2). As outlined in Section 3.6 Historic Resources of the final SEIS, the removal of Buildings 40 and 41 in order to interpret El Presidio would have an adverse effect on these individual resources and the National Historic Landmark District and thus was identified as having a significant impact on historic resources. Likewise, under Section 3.12 Cumulative Impacts, a significant impact on historic resources was analyzed. This impact could be mitigated with the relocation of Buildings 40 and 41 to a compatible location in the Presidio.

138 Cumulative Impacts of Remediation Activities Should Be Analyzed

More information on the Trust's cumulative impact analysis of the ongoing environmental remediation occurring at various sites within the Presidio should be provided. These activities affect land use, traffic, soils, water quality, air quality, and cultural resources.

Response The cumulative impact analysis does not include remediation activities because past environmental analysis conducted for each of the sites has demonstrated that impacts on the affected resources are not significant, and have been proven to be temporary in the short term and inconsequential and beneficial in the long term. The purpose of the cumulative impacts analysis is to focus on meaningful effects to promote better decision making, not simply to produce an exhaustive catalog of environmental effects for its own sake. Remediation activities have been excluded from the analysis because resources of interest would not be

affected significantly, and any short-term impacts are not germane to decisions about the proposed action and its alternatives.

139 Affects of Doyle Drive's Accelerated Construction Schedule Should Be Discussed

Additional discussion of the effects of Doyle Drive's construction on the cumulative impact analysis is needed. The effects of the accelerated construction schedule could have impacts on the phasing of Main Post construction and may open up project alternatives that have not been explored.

Response Acceleration of the Doyle Drive project due to federal stimulus money would not result in any impacts that were not previously disclosed in the Doyle Drive final EIS/R, which was used as the basis to determine cumulative impacts that might reasonably be expected as a result of the project. The only upcoming project that would be directly or indirectly affected by Doyle Drive is the revitalization of Tennessee Hollow, where the creek channel intersects with the proposed parkway. The project, known as the Quartermaster Reach, is proceeding according to schedule, and has been subject to noticing, scoping, and environmental review.

140 Cumulative Impacts on the PTMP Should Be Analyzed

The cumulative impacts analysis makes no mention of how the future management of the Presidio is likely to be affected. A detailed discussion of how implementation of the preferred alternative would affect the existing PTMP is needed. The cumulative effects analysis does not acknowledge planning problems that would be created by significantly changing the PTMP's square footage targets.

Response While the estimated square footage associated with new construction and demolition (including the building demolition for the Doyle Drive project) would increase under the Main Post Update, the overall square footage for the Main Post would be 14,000 square feet less than was estimated for the Main Post district in the PTMP. Thus, the Main Post Update would not significantly change the PTMP square footage targets.

2.20 OTHER IMPACTS

141 Environmental Justice Impacts of Sewage and Stormwater Runoff Should Be Evaluated

The SEIS should analyze the environmental justice impacts of the proposed full build-out of the Presidio on the amount of sewage and stormwater delivered to the Hunters Point wastewater treatment plant.

Response Environmental justice impacts due to the Main Post Update are discussed in Section 3.13 Other Impacts of the final SEIS. The analysis concludes that none of the alternatives would substantially increase the burden on the Bayview and Hunters Point neighborhoods community due to wastewater discharges to the city's wastewater systems. Unlike the City and County of San Francisco, the Presidio (with the exception of the Public Health Service district) does not have a combined sewer system that collects both wastewater and stormwater in the same network of pipes. As stormwater is treated and discharged directly into the bay, the amount of flows transported to the city's treatment plants are substantially lessened. Furthermore, since 1990, total annual wastewater flows within the Presidio have been reduced to approximately 145 million gallons, or less than a third of 1990 flows.

Current and projected future flows would represent less than one half of one percent of the dry and wet weather capacities of the Southeast Treatment Plant in the city's Bayview/Hunters Point area. Upon completion, the Trust's proposed on-site water recycling plant would capture and reuse the majority of the Presidio's wastewater flows that are treated at the Southeast Treatment Plant. Implementation of stringent water conservation practices, including requirements for water-efficient fixtures (toilets, faucets, etc.) in all building rehabilitation projects, would also minimize wastewater generation at the park. Although future contribution is very small, the Trust is committed to further reducing these flows to the greatest extent practicable and assist in alleviating any burden placed on the Bayview and Hunters Point neighborhoods.

142 The Increased Demand on San Francisco Emergency Services Should Be Reviewed

The Presidio has seen cutbacks in emergency services, creating an increased strain on San Francisco to provide support services that necessarily reduces availability for the city's needs. While projecting a huge increase in visitors to the Presidio, the draft SEIS does not provide solutions from within the Presidio for the anticipated future demand for such services.

Response Since the closing of the Presidio as a military post in 1994 until recently, the National Park Service retained emergency medical response for the park. Additionally, the San Francisco Fire Department (SFFD) provided emergency medical services (EMS) to the Presidio on an as-needed basis when the NPS resources were insufficient to respond to events within its boundaries. Under the terms of an agreement between the Trust, NPS, and the City and County of San Francisco, as of

October 1, 2010, the San Francisco Fire Department (SFFD) is the authority having jurisdiction for EMS in the Presidio. With federal funding to cover EMS and other costs, the SFFD operates Station 51 in Building 218 on the Main Post. The SFFD provides the same level of EMS that is provided in other parts of the city, and staffs its ambulatory crews to comply with all requirements of federal law and regulation pertaining to the provision of EMS and to local agency standards, policies, and medical protocols. Given the physical location of Station 51 on the Main Post, proposals within the Main Post Update would have no impact on EMS response times or proposed staffing.



----- Main Post Planning District



Source: Presidio Trust 2010



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