FINAL ENVIRONMENTAL IMPACT STATEMENT AND PLANNING GUIDELINES

THE PRESIDIO TRUST

FOR NEW DEVELOPMENT AND USES ON 23 ACRES WITHIN

THE LETTERMAN COMPLEX

A SUPPLEMENT TO THE 1994 GENERAL MANAGEMENT PLAN AMENDMENT ENVIRONMENTAL IMPACT STATEMENT FOR THE PRESIDIO

PRESIDIO OF SAN FRANCISCO
MARCH 2000

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

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

Presidio of San Francisco, San Francisco, California

This Final Supplement to the 1994 General Management Plan Amendment (GMPA) Final Environmental Impact Statement (EIS) for the Presidio describes and evaluates a preferred alternative (Digital Arts Center/Alternative 5) and five additional alternatives for development and occupancy of new low- to mid-rise buildings totaling approximately 900,000 square feet within a 23-acre site on the 60-acre Letterman Complex located in the northeast corner of the Presidio of San Francisco. In this Final Supplement, circulated and filed as a Draft in April 1999, two of the six alternatives, a specific proposal for the site (Science and Education Center) and a no-action alternative, were previously analyzed by NPS in the 1994 GMPA EIS. The other four alternatives were identified through the Trust's August 1998 Request for Qualifications and scoping process. They include a Sustainable Urban Village, a Mixed-Use Development, and a Live/Work Village.

Under the 1996 Presidio Trust Act, which created the Trust to manage Presidio facilities so as to make the Presidio financially self-sufficient by year 2013, the Trust is the successor in interest to NPS for purposes of National Environmental Policy Act (NEPA) compliance. The Presidio Trust is the Lead Agency for this project under NEPA, and pursuant to interagency agreement, the NPS is a Cooperating Agency. The Presidio Trust may rely on earlier NPS analysis except to the extent that the Trust proposals depart from plans previously analyzed under NEPA. The Digital Arts Center (DAC) differs from the 1994 GMPA's Science and Education Center in that it would not be devoted to issues of health, life and earth sciences, but rather to developing technologies in the digital and interactive arts and sciences. Unlike the Science and Education Center, which would retain the 356,000-square-foot Letterman Army Institute of Research (LAIR) for use but remove the functionally obsolete 451,000-square-foot Letterman Army Medical Center (LAMC) if it did not meet essential program and management needs, the DAC would demolish and replace both. Further, rather than promoting infill construction throughout the 60-acre Letterman Complex, the DAC would approximate the existing LAMC/LAIR footprint within the 23-acre site. Lastly, although the amount of new replacement construction within the 23 acres would be increased, the 1994 GMPA's key restrictions on maximum allowable square footage for the complex (1.3 million square feet) and maximum allowable height of new construction (60 feet) would not be exceeded by the DAC. Replacement construction would also proceed in accordance with Planning Guidelines as recommended within the 1994 GMPA and included within this Final Supplement.

As required by NEPA, this Final Supplement analyzes new circumstances (such as the need for the project to be responsive to the Presidio Trust Act) and new information relevant to environmental concerns (such as water supply and traffic) that were not foreseen or considered during preparation of the 1994 GMPA EIS. This document also incorporates by reference issues which have been adequately examined in the previous 1994 GMPA EIS, and concentrates solely on issues identified during scoping and preliminary environmental review as requiring additional analysis, specifically: consistency with approved plans and policies; solid waste; water supply and distribution; schools; housing; medical research; traffic and transportation systems; cultural resources (including impacts on visual resources and the visitor experience); air quality; noise; and cumulative impacts.

No decision on the preferred alternative shall be made or recorded until at least 30 days after the publication of notice by the U.S. Environmental Protection Agency (EPA) that this Final Supplement has been filed with the EPA. For additional information about this document or the NEPA process for new development and uses within the Letterman Complex, please contact the Presidio Trust at the address provided on the back cover or by phone at 415/561-5300.

Introduction

The Unique Presidio Site – The 1,480-acre Presidio of San Francisco is one of the country's great natural and historic sites. It possesses an extraordinary combination of natural beauty, ecological diversity and historical significance. A military garrison for nearly 220 years under three different flags, the Presidio is a National Historic Landmark within the Golden Gate National Recreation Area (GGNRA), an extensive national park that begins where the Pacific Ocean meets the San Francisco Bay. The Presidio is unique within the national park system. Its natural and historic setting is integrated into 700 developed acres with more than 780 buildings and approximately 6.0 million square feet of building space. Its offices, warehouses, residential areas, more than 1,100 housing units, roads system, utility infrastructure, retail stores, tennis courts, bowling center, theater, swimming pool, golf course, gymnasiums and other facilities are within a park boundary that itself is located within an amalgam of heavily urban and suburban communities. The Presidio's characteristics make it an exceptional place for people to live, learn, work, and play.

From Military Post to National Park – The Presidio's transition from military post to national park began in 1972 when, in the legislation creating the GGNRA, Congress included a provision that the Presidio would become part of the GGNRA if the military ever declared the base excess to its needs. After the Presidio was designated for closure in 1989, the Presidio's long-time occupant, the U.S. Army, transferred in 1994 the jurisdiction over the Presidio to the National Park Service (NPS). As part of the transition, the NPS in July 1994 completed and issued a final General Management Plan Amendment (GMPA) for the Presidio laying out a vision for its future use and management. While NPS's GMPA set out general land use plans for 13 distinct Presidio planning areas involving a varied mix of preservation, rehabilitation, demolition, and new construction, the GMPA contemplated that more detailed site-specific plans and designs with supplemental environmental analysis would be prepared during its implementation.

Innovative Approaches and Authorities for the Presidio – Once the plan was created, difficult issues remained of how to fund the implementation of the plan. NPS recognized that implementing the GMPA would require innovative approaches and unique authorities to manage those aspects of the GMPA outside of NPS's expertise, such as leasing, repair, property management, and fund-raising. As Congress debated the creation of a new managing entity, estimates of costs to implement the GMPA showed the Presidio to be by far the most expensive park managed by NPS. NPS estimated annual costs at $40 million and capital improvement cost estimates ranged from $490 million to $741 million. By way of contrast, the annual cost of maintaining Yellowstone, the next most expensive park in the national park system, is $20 million. In view of these projections, Congress was unwilling to commit the extent of federal monies needed over the long-term to improve, protect, and maintain the Presidio, but was willing to create an innovative entity that would be charged with achieving these goals.

Creation of the Presidio Trust and Its Unique Mandate – In 1996, Congress established the Presidio Trust (Trust) pursuant to the Presidio Trust Act (16 U.S.C. 460bb appendix) (Trust Act). In response to competing public policy goals, Congress gave the Trust the unique responsibility to reduce and eventually eliminate the costs of the Presidio to the federal government while retaining the Presidio within the GGNRA. To achieve

these goals, Congress provided only a limited budget, which would incrementally decrease to zero over 15 years, and provided no appropriated funds targeted for needed capital expenditures to preserve the park resources. Although it did not provide full funding, Congress granted the Trust unique authorities to accomplish the Trust Act's goals. The Trust has unique authority to generate and retain revenue and to borrow money to finance repair and rehabilitation of the Presidio's historic structures, and flexibility in operating procedures to secure Presidio tenants in an ever-changing environment.

The Presidio Trust is a wholly-owned federal government corporation whose purposes are to preserve and enhance the Presidio as a national park, to ensure that the Presidio becomes financially self-sufficient (i.e., generate sufficient revenue without any federal appropriation to fund long-term operating and maintenance costs) by 2013. The Trust assumed administrative jurisdiction over 80 percent of the Presidio on July 1, 1998, and NPS retains jurisdiction of the coastal areas. The Trust is managed by a seven-person Board of Directors, on which a Department of Interior representative serves. The Trust brings to the built areas of the Presidio diverse experience, including real estate leasing, finance, development and property management, and will apply this expertise to lease more than 3 million square feet of new and historic building space and over 1,100 housing units in the Presidio. NPS, in cooperation with the Trust, provides visitor services and interpretive and educational programs throughout the Presidio.

The GMPA as Master Planning Document – In carrying out the mandates of the Trust Act, the GMPA, finalized by NPS in 1994, is the foundational plan that guides the Trust's planning and decision-making. Its importance is reinforced by both the Trust Act and Trust policy. The Trust Act directs the Presidio Trust to manage the property under its administrative jurisdiction in accordance with both the purposes of the Act establishing the GGNRA and in accord with the "general objectives" of the GMPA. While the general objectives set forth in Presidio Trust Board Resolution 99-11 dated March 4, 1999 (General Objectives) are the Act's required guideposts, the Trust continues to use the GMPA as the master document to guide its decision-making, despite the fact that changed conditions at times require the Trust to reassess certain of the GMPA's site-specific plans and programs. In sum, as a matter of law, the Presidio Trust follows the General Objectives of the GMPA, and as a matter of policy, the Trust uses the GMPA as its principal guide for all planning activities.

Given the Trust's reliance on the GMPA as the foundational planning document for purposes of NEPA, NEPA does not require development of a new comprehensive plan for this Supplemental EIS. Nevertheless, both NPS and the public have expressed desire for the Trust to better explain how it intends to implement the GMPA Presidio-wide in view of the need under some circumstances to depart from the site-specific proposals of the GMPA. The Trust believes that the best means to understand the Trust's approach to GMPA implementation is to undertake certain additional comprehensive planning that tiers off the GMPA. In proposing this undertaking, the Trust acknowledges and wishes to respond to the strong sentiment of NPS as a cooperating agency and the public generally to clarify the Trust's Presidio-wide approach to circumstances that have changed since finalizing the GMPA and to the specific comprehensive program elements of Section 104(c) of the Trust Act. The Trust has made no decisions on the scope of such comprehensive planning, but anticipates future public sessions to involve the interested community in helping to define both its scope and content.

The Presidio's Letterman Complex – The Letterman Complex, located in the northeast portion of the Presidio, is in close proximity to the Marina District of the city of San Francisco outside the Lombard Street Gate. It is today, as it has been historically, one of the most urbanized locations within the Presidio. Intensive use of the site began in 1898 with the construction of the original Letterman Hospital, which established this area of the Presidio as a link to the adjacent city. By 1915, the 23-acre site became home to a portion of the Panama Pacific International Exposition, and after World War I the site of the East Letterman Hospital expansion. Between 1965 and 1976, as the military planned for a more modern hospital site, the East Hospital at the 23-acre site was removed to make way for two new and more modern structures, the 451,000-square-foot Letterman Army Medical Center (LAMC) and the 356,000-square-foot Letterman Army Institute of Research (LAIR).

Consistent with the intensity of historic use, the Letterman Complex was designated under the Presidio GMPA as one of the "building and activity cores" where building demolition and replacement construction would occur. The complex contains approximately 1.3 million square feet in about 50 buildings. The bulk of that space is contained in a 23-acre site that includes the non-historic, functionally obsolete LAMC and the non-historic LAIR, which dominate the area. An additional 158,000 square feet of space are included in the Thoreau Center for Sustainability, which exists within buildings recently rehabilitated in the historic hospital complex. The Letterman Complex also contains surface parking lots, landscaped areas and approximately two miles of roadways.

The Letterman Complex/Lead Project and Economic Engine – Before Congress could create the new federal entity (now the Presidio Trust) and with the Presidio buildings and infrastructure in critical need of rehabilitation and repair, Congress enacted special legislation giving NPS interim leasing authority to begin implementing the GMPA. Recognizing the Letterman Complex as having the greatest revenue-generation potential for the Presidio, NPS chose to pursue leasing of Letterman facilities in order to generate sufficient revenues early in the GMPA's implementation to address the critically deteriorating condition of other Presidio facilities. In 1994, therefore, NPS solicited potential tenants for the Letterman Complex, and entered into lease negotiations with the University of California at San Francisco (UCSF) to occupy the two largest facilities on the site: the hospital and research center. Although NPS ultimately leased a small portion of the buildings at other parts of the complex, the negotiations with UCSF (and others) subsequently failed, and what to do with the still vacant hospital and research center facilities on the 23 acres at the southeast portion of the site was left to the Trust as among its early responsibilities following its creation in 1996.

Where the Trust has now turned its efforts to the unfinished Letterman Complex implementation, it is with the understanding that like other federal government entities, the Trust is required to carry out its mission in compliance with NEPA. Under the Presidio Trust Act, the Presidio Trust is considered the successor-in-interest to the NPS for purposes of compliance with NEPA. Thus, to the extent that the Trust seeks to implement proposals that have been previously adequately analyzed under the GMPA EIS, the Trust may rely upon that earlier analysis. Where the Trust's proposals depart from the plans previously analyzed under NEPA, however, the Trust undertakes further environmental review consistent with the requirements of NEPA, the National Historic Preservation Act (NHPA), and other relevant environmental review laws and executive orders.

Underlying Purpose and Need

The proposed Letterman project is needed to achieve the varied mandates of the Trust Act, most importantly the self-sufficiency requirement. The Trust was considering the new Trust Act mandates when it returned to the implementation of the planning process that the NPS had started several years earlier for the Letterman Complex. The proposed project is intended to serve as an economic engine, generating early and significant revenue to pay for capital improvements and historic building rehabilitation that, in turn, will allow revenue generation at other areas of the Presidio.

Consistency with the Trust Act Mandates – Although the Presidio is part of the national park system, many of the Trust Act requirements differ significantly from those that NPS must meet in managing property under its administrative jurisdiction, and were not anticipated or addressed by the drafters of the GMPA during its development. The Trust Act mandates are, however, a necessary element of the Trust's decision-making process. At the threshold, the Trust must manage its portion of the Presidio in such a way as to become financially self-sufficient by the year 2013 (generating sufficient revenue without any federal appropriations to fund the operating and long-term maintenance costs for the Presidio). If the Trust fails, the Presidio will be sold as federal surplus property. In addition, Congress believed that selection of tenants that enhance the financial viability of the Presidio is the most important tenant selection criterion, and made this a requirement of the Trust Act. Other requirements involve giving consideration to an expanded program of building demolition for certain categories of buildings, obtaining reasonable competition in the tenant selection process, and considering whether prospective tenants reduce costs to the federal government.

Achieving Financial Self-Sufficiency – Having set the self-sufficiency requirement, Congress required the Trust, among its first official acts, to present to Congress the Trust's plan for achieving the mandate. On July 8, 1998, the Trust presented to Congress a Financial Management Program (FMP, provided in Appendix E) detailing how the Presidio would become independent of federal appropriations within 15 years after the first meeting of the Trust Board of Directors (i.e., by July 8, 2013). Building upon the GMPA, which was a comprehensive programmatic plan for the Presidio, the FMP was to serve as the budgetary program for meeting the newly imposed financial self-sufficiency requirements of the Trust Act.

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

Building upon this and other studies, the FMP presents a forecast of replacement reserves and capital and operating costs associated with leasing, maintenance, rehabilitation, repair and improvement of property within the Trust's administrative jurisdiction at the Presidio. It further projects the recovery of these costs through a combination of near-term federal appropriation, borrowing from the U.S. Treasury, and lease revenues. Using these forecasts and assumptions, the FMP sets forth a declining schedule of appropriations until the date of financial self-sufficiency and demonstrates how, over the 1998 to 2013 time-period, the Presidio Trust can

complete needed upgrades to buildings, open space, and infrastructure to enable and enhance use of the Presidio as a national park by tenants and park visitors.

In order to break even by 2013 with a small margin, the FMP forecasts the need for $36.6 million of annual revenues. The Trust's primary source of ongoing revenue to support this cost is from the lease of residential and non-residential real estate. Lease revenues account for $35.6 million of the $36.6 million annual total, and the proposed project is expected to be the single largest non-residential component (by 2.5 times) of the revenue needed to meet the financial self-sufficiency plan of the FMP. With respect to total revenue needed to meet the financial self-sufficiency plan of the FMP, the proposed project is expected to yield minimum annual ground lease revenue of $5 million, accounting for one-third of non-residential lease revenues needed, or 14 percent of the total lease revenues. To provide the revenue stream to make the capital investments needed to assure the revenue targets in the FMP are met, this revenue stream must start early, phased in over several years, beginning in 2000. Further, the LAMC/LAIR tenant must be financially capable of funding more than $200 million in capital costs to redevelop the LAMC/LAIR facilities.

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

The FMP Establishes the Proposed Project Parameters – Congress's command to establish the financial forecasts of the FMP served to establish the parameters of the proposed project. These parameters, demolition of LAMC/LAIR and 900,000 square feet of replacement construction, were made part of the Trust's Letterman RFQ and are currently under study in this EIS. In its RFQ, the Trust solicited a project calling for the demolition of the functionally obsolete LAMC/LAIR buildings. Demolition would be followed by redevelopment and use of newly constructed low- to mid-rise, or lower-profile mixed-use buildings totaling approximately 900,000 square feet and some infrastructure improvements within a 23-acre site within the Letterman Complex.

With respect to the 900,000 square feet, valuation analyses showed that, in order to yield the FMP's forecasted revenue for the Letterman Complex, a project of 900,000 square feet is needed. Valuation analyses for this size development showed that revenue yields could range, depending upon a variety of financial variables, from $3.8 million to $5.7 million annually, an amount which under the FMP was needed to fuel the financial investment badly needed to address other building and infrastructure improvements throughout the Presidio. Because the Trust could not be sure until the market responded to an actual proposal whether the market would yield the projected income or where within this range revenue yields would actually fall, it was considered financially imprudent to base the FMP on, or to later solicit, a smaller-scale project. The majority of the square footage would derive from demolition and replacement of LAMC and LAIR, and the failed 1994 NPS leasing initiative, market analysis, and the Trust Act requirements supported this FMP assumption.

Once the FMP had established the need for a 900,000-square-foot project, focusing the proposed project within the 23-acre site was considered by the Trust as most consistent with the FMP's financial planning parameters. In making this decision, the Trust evaluated and relied upon a number of factors. The 23-acre site continued the historic density by approximating the development footprint of LAMC and LAIR during the Army's tenure and continuing an intensity of use at one of the only sites on the Presidio that historically has been subjected to intensive development because of its proximity to the urban area and amenities outside the Presidio. In addition, the site offered development flexibility. Being an already built-out area of the Presidio, the site is by far the largest among a limited number of sites identified in the GMPA for potential new construction and does not house historic buildings, which add complexity and higher project costs that bring down the revenue generation potential. The 23-acre site offers amenities that other Presidio sites could not as effectively provide, such as ready access to transportation and urban amenities outside the Presidio boundary. Lastly, the site offers important marketing and development efficiencies. To obtain the forecasted revenues, the Trust had to look to a site that under real-world marketing pressures could offer the essential combination of characteristics for success, and the 23-acre site offered this combination.

In sum, the GMPA together with the financial forecasts of the FMP set forth a rational means to begin to implement the newly enacted Trust Act self-sufficiency requirement. The purpose and need of proposing to develop a project at the Letterman Complex under the parameters set out in the Trust's Letterman RFQ is to generate assured income in the amount and on the timetable forecast within the FMP.

GOALS

In light of the Trust Act and other considerations, the proposed project must meet a number of goals to the fullest extent possible as summarized below:

- The mission and work of users or tenants of the Letterman Complex must be consistent with the Presidio Trust's mandate, as provided by the Presidio Trust Act, including the purposes of the GGNRA Act and the General Objectives of the GMPA.
- The project must be consistent with the self-sufficiency requirement of the Trust Act, and must generate revenue consistently with the forecasts and planning assumptions of the congressionally required FMP and the other requirements of the Trust Act that bear upon the revenue generation goal.
- The users or tenants must demonstrate an ability to finance the project, including the demolition of the medical center and research institute, so as to assure timely development and full occupancy.
- The users or tenants must explore and find ways to further the goals of the Presidio related to social programs, environmental programs, shared space and public outreach and input.
- The users or tenants must be involved in desirable sectors as identified in the GMPA (such as education, arts, scientific research and environmental studies) or in related sectors reflecting evolving market conditions (which would also include multi-media, Internet-based research and development and other high-technology, knowledge-based industries).

- New construction must be designed and sited to be compatible with the Presidio's National Historic Landmark status, comply with the regulations that govern application of the NHPA, and adhere to site-specific Planning and Design Guidelines.
- Users or tenants must participate in a transportation demand management program for the Presidio and take actions to reduce automobile use by employees and visitors and the demand for parking.
- Users or tenants must incorporate environmentally responsible and sustainable design principles, including employing energy-efficient material and building techniques, and operating measures.

Alternatives

Although the analysis in this EIS has been narrowed to review of six proposals, a myriad of proposals have been previously considered and most rejected during the more than ten years since the planning process for the future of the Letterman Complex began. The EIS briefly summarizes the full range of alternatives that have been considered for the Letterman Complex by the Presidio Trust or its predecessor, the NPS, but that have been rejected and are not being evaluated in detail in this document. Each of these alternatives was initially thought to be viable and/or was suggested by the public, but following either detailed analysis by the NPS in the Presidio GMPA EIS or initial review by the Presidio Trust, each was determined not to merit detailed analysis in this document. In general, none of the alternatives rejected for analysis in this EIS sufficiently resolves the underlying purpose and need or fulfills the stated objectives to a significant degree (refer to Section 1, Purpose and Need):

1. Alternative sites for new construction, including the Public Health Service Hospital, Fort Scott, and other portions of the Letterman Complex.
2. Smaller-scaled development.
3. Alternative uses, including a university, a private school, a nursing facility and assisted living facilities.
4. Removal of the LAMC and LAIR and restoration to natural conditions.
5. General Service Administration management (public sector enclave).
6. Boundary revision to exclude the Letterman Complex from the Presidio.
7. Partial military reuse.

In response to the unique financial, planning, and tenant selection mandates of the Trust Act (see Section 1.2.1), of key importance to the Trust's process of developing and selecting the alternatives for analysis was to identify alternatives based upon proposals that the marketplace could actually offer. The Trust was interested in proposals, compatible with the General Objectives of the GMPA, which did not require federal money but rather would generate income and which in the real world would be built. Building the process of alternative identification around this efficiency was intended to avoid the result of having studied and selected a prospective use for which no tenant could ultimately be found, as was the case when UCSF and others failed to lease the LAIR/LAMC facilities following the GMPA EIS and the NPS RFQ for the Letterman Complex.

Therefore, the Trust, through its own RFQ and later Request for Proposals (RFP) for the Letterman Complex, solicited market-based proposals from submitters capable of ground leasing and developing 900,000 square feet of new construction on a 23-acre site within the Letterman Complex. A project of 900,000 square feet was necessary to achieve the financial expectations of the FMP, and the 23-acre site approximated the density that already existed and was proposed as a possibility under the GMPA at this developed site (see Section 1.2.2).

For the purposes of this document, six alternatives have been formulated for development and occupancy of the site: a "Science and Education Center" (the Updated Presidio GMPA Alternative, or Alternative 1); a "Sustainable Urban Village" (Alternative 2); a "Mixed-Use Development" (Alternative 3); a "Live/Work Village" (Alternative 4); a "Digital Arts Center" (the Preferred Alternative, or Alternative 5) and "Minimum Management" (the No Action Alternative, or Alternative 6). The alternatives were selected on the basis of input received during public involvement activities and the proposals received and considered by the Presidio Trust in response to its RFQ to develop the 23-acre site.

Together, Alternatives 1 through 6 present a rational and realistic range of alternatives for analysis. Alternatives 1 and 5 would use the 23-acre site for research purposes by a single tenant or a collaborative group of institutions, while Alternatives 2, 3, 4, and possibly 6 would offer an array of programs offered by a number of public and private organizations. Alternatives 2 and 3 would provide lodging and conference centers as a major focus of activities. Alternatives 2 and 4 would provide a substantial housing component for employees or to the general public. Alternatives 2, 3, and 4 would be designed as mixed-use villages with central open spaces in a traditional urban pattern, while Alternative 5 would feature a series of linked buildings set around an open park (Great Lawn) that reflect an earlier pattern of development at the complex. Alternatives 1 and 6 would retain the 356,000-square-foot LAIR which, under Alternatives 2 through 5, would be demolished. Alternative 1 would provide for infill construction throughout the 60-acre complex while Alternatives 2 through 5 would limit construction to a 23-acre site. Alternatives 1 and 6 would retain the existing 8-acre parking lot, which under Alternatives 2 through 5 would be removed and replaced primarily with underground parking.

ALTERNATIVE 1: SCIENCE AND EDUCATION CENTER (UPDATED PRESIDIO GMPA ALTERNATIVE)

Under Alternative 1, the 23-acre site would be used for scientific research and education facilities focusing on issues of human health. The LAIR would be retained and leased by a single tenant or a collaborative group of institutions for laboratory-based research. The LAMC could be partly or entirely removed to enhance open space. Up to 503,000 gross square feet of replacement construction could occur within the 60-acre complex as a substitute for buildings identified for demolition, including the medical center. Potential sites for new construction would include infill development that reinforces the historic hospital complex's courtyard and campus setting.

ALTERNATIVE 2: SUSTAINABLE URBAN VILLAGE

Alternative 2 would create a campus for education, office space, health care, residential, and an inn/retreat organized around a "commons." The LAMC and LAIR would be entirely removed and replaced with up to 900,000 gross square feet of new construction within the 23-acre site. Institutional facilities would focus on issues related to senior health. Senior health research activities would include research on aging, senior day care and related group and individual programs. A culinary institute would offer a degree program in culinary arts

and sciences and operate two restaurants that would be open to the public. A professional graduate institution would offer educational programs in eastern medicine and would include a research institute and a museum. For-profit high-tech companies and non-profit organizations would occupy the office space. Housing would include between 300 to 400 rental units, which would be leased to students enrolled at the educational facility, and to those working at the Presidio or to the general public. A 250-room inn/retreat would provide lodging for Presidio visitors, and serve as a conference and retreat facility for the adjacent institutional and health research tenants.

ALTERNATIVE 3: MIXED-USE DEVELOPMENT

Alternative 3 would create a mixed-use development including a conference center with lodging, a senior living center, a culinary institute and office space to be occupied by for-profit and non-profit organizations. The LAMC and LAIR would be entirely removed and replaced with up to 900,000 gross square feet of new construction within the 23-acre site. The conference center would serve as a national and international learning and education center, providing a wide range of activities, including training programs available to the community. A 350-room lodge would support the conference center program, and also would be available for the Presidio and community needs. The senior living facility would consist of assisted living accommodations and nursing care. Neighborhood service retail would provide convenience shopping, food and other services to guests, visitors and residents of the Presidio community.

ALTERNATIVE 4: LIVE/WORK VILLAGE

Alternative 4 would create a mixed-use complex containing office buildings, between 400 and 450 residential units and a small amount of support services. The LAMC and LAIR would be demolished and replaced with up to 900,000 gross square feet of new construction within the 23-acre site. The office and residential buildings would be separated by open space at the center of the site, which would serve as a "public green." The office space would be used by a variety of tenants, including an anchor tenant involved in Internet programming. A mix of for-profit and non-profit organizations would be located in the village. A branch library, part of the state library system, would establish a facility at the site that would be open to the public with a collection focusing on history and genealogy. Residential units would include loft-type units to encourage live/work situations.

ALTERNATIVE 5: DIGITAL ARTS CENTER (PREFERRED ALTERNATIVE)

Alternative 5 would provide an office campus for several units of a single company engaged in research, development and production of digital arts and technologies related to the entertainment, education, communications, and other industries. The LAMC and LAIR buildings would be replaced with new buildings containing approximately 900,000 square feet of space. An archive containing key materials relevant to the development of the digital entertainment industry, available to scholars, researchers and educators, would be maintained at the center. A training institute would offer a semester-long curriculum for individuals pursuing a career in the digital arts. This alternative would devote a portion of the site to a landscaped open space designed for use by park visitors, employees of the facility, other Presidio tenants, and neighbors.

ALTERNATIVE 6: MINIMUM MANAGEMENT (NO ACTION)

Under Alternative 6, the LAMC would be "mothballed" and the LAIR would be permitted/leased for office and research use without major rehabilitation. Tenants would be encouraged to, but may not, provide public programs consistent with the General Objectives of the GMPA. Routine administrative and facility management

programs would be carried out, but site improvements and cultural landscape rehabilitation would be limited. Programs would be designed to reduce expenditures by the Trust and increase revenues to the federal government to the maximum extent possible subject to applicable environmental compliance statutes. Few actions would be taken to expand visitor opportunities.

A tabular summary of the alternatives is provided at the beginning of Section 2.

Major Conclusions

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

Consistent with the tiering process, the Environmental Screening Form in Appendix A is a tiering analysis that summarizes 36 impact topics discussed in the GMPA EIS. Based on the results of the Environmental Screening Form and consultation and coordination efforts (as discussed in Section 5), the Presidio Trust determined that the significant issues listed below required additional analysis in this document, and the conclusions from that additional analysis are presented.

Consistency with the Presidio Goals and Approved Plans – Alternatives 1 through 5 would provide programs and visitor services or concessions consistent with the General Objectives of the GMPA, and would proceed in accordance with the Final Planning Guidelines (included as Appendix B to this document) and design review. Only Alternatives 1 and 5 (and possibly Alternative 6) would retain and use the site for research purposes by a single tenant or a collaborative group of institutions. Alternative 1 is not consistent with the GMPA's General Objective to sustain the Presidio indefinitely as a great national park in an urban setting, because there is no current market demand for use of the site for laboratory-based research. Alternatives 2 through 5 would not promote infill construction within the complex as recommended within the GMPA but would focus replacement construction where it currently exists within a 23-acre site. None of the alternatives would exceed the GMPA's key restrictions on maximum allowable square footage for the complex (1.3 million square feet) and maximum allowable height of new construction (60 feet).

Solid Waste – Alternatives 1 through 5 would generate between 35,400 tons (Alternative 1) and 80,000 tons (Alternatives 2 through 5) of debris during construction activities. This represents just over 0.5 percent and 1 percent, respectively, of the 6.6 million tons total volume of waste disposed of annually in the Bay Area. The Presidio Trust would deconstruct and recycle at least 50 percent of the building debris, and receiving landfill operators would implement standard construction debris waste stream diversion practices to minimize the

quantity of debris directed to the regional landfill sites. Thus, demolition of the LAMC and LAIR is not likely to have a significant effect on the life of landfills in the region.

Water Supply and Distribution – The recent completion of renovations and upgrades at the Presidio water treatment plant has made it possible to resume diversions of Lobos Creek for potable and non-potable water within the Presidio. Diversions from this water resource are limited by natural flow capacities, resource protection law, and specific goals in the GMPA. Alternatives 1 through 5 would demand between 20,000 gallons per day (gpd) (Alternative 1) and 111,000 gpd (Alternative 2). Water supply- and demand-side measures such as onsite wastewater reclamation and water conservation as identified in this document would mitigate or minimize cumulative impacts on the Presidio-wide water supply and baseline stream flows maintained in Lobos Creek.

Water Quality – All alternatives under consideration would have minimal effects on water quality in San Francisco Bay. No major demands or impacts on the storm drainage system are expected. Structural and operational best management practices (such as oil and grease traps in catchbasins) would be implemented to reduce pollutant sources and pollutant concentrations in storm-water runoff. Alternatives 2 through 5 would incorporate innovative permanent features to reduce the quantity and improve the quality of discharged storm water that would reach the Bay.

Wastewater Treatment and Disposal – The sanitary sewer system at the Letterman Complex consists of several lines of variously sized cast iron pipe that flow to the east and discharge into the City and County of San Francisco system at the Lombard Street Gate. The system has recently been upgraded. Maximum outflow resulting from the alternatives (78,000 gpd) would not burden the City and County of San Francisco wastewater treatment facilities because the city has the capacity to handle the estimated sewage discharge. However, new development at the complex would contribute incrementally to the discharge of partially treated sewage to the city's combined sewer system during major storm events. To offset increases in overflow volumes attributable to increased sanitary flows at the 23-acre site, a reclaimed water system would be constructed to supply irrigation water for use in the Presidio and to lower the volume of wastewater discharged to the city's system.

Regional Economy and Employment – Changes in employment and earnings are not expected to have a major effect on the regional labor market. Nevertheless, these changes should provide a boost to San Francisco's economy because much of the income gain is expected to occur within the city. Development within the Letterman Complex is estimated to increase city employment and payroll by about 0.14 percent. New employment and uses could lead to an increase in expenditures for business-related and personal goods and services, ranging from office supplies and major equipment to daily lunches. Portions of this incremental increase in retail expenditure would be captured by businesses in areas along the western ends of Lombard Street and Chestnut Street. Thus, the incremental increases in expenditure levels would provide increased business opportunities for retail and service establishments located in these areas, and no significant impacts are expected.

Law Enforcement Services – The U.S. Park Police would have primary law enforcement responsibility at the Letterman Complex. Law enforcement services are expected to be sufficient to control criminal activity, and

there would be no impacts on operations or services, or on surrounding residential neighborhoods and commercial districts. Any additional service costs of law enforcement services would be reimbursed through Service District Charges, which would take into account the type of use, hours of use, the type and availability of parking, the numbers of after hour or special events, the mix of commercial, visitor and residential occupants, internal security needs, and integration of this service into the existing public safety infrastructure.

Fire Protection and Emergency Medical Services – Fire protection and emergency medical services would primarily be provided by the Presidio Fire Department. No negative impact on these services is expected. Given the physical proximity of the complex to Station 1 and the 60-foot height limit for new construction at the site, no changes in response times, the number and type of companies or staffing plans are expected under any of the proposed alternatives. However, to the extent that a specific use, massing or geographic distribution of structures results in requirements for fire protection services or specialized equipment in excess of existing or planned service and/or equipment outlays, the Presidio Fire Department would be reimbursed for these additional service and/or equipment costs. These requirements, if any, would be identified during the plan check process in accordance with normal industry practices.

Schools – The alternatives would generate between 92 (Alternatives 1, 3, 5 and 6) and 273 schoolchildren (Alternative 4) who would enroll in San Francisco Unified School District (SFUSD) schools. These schoolchildren would not require the SFUSD to develop new capacity within existing or new school sites. Because these levels of enrollment are within the existing capacity of SFUSD, no adverse impact on SFUSD schools is expected.

Housing – The Presidio would be able to accommodate between 55 percent (Alternative 5) and 100 percent (Alternatives 1, 2, 4 and 6) of regional housing demand created by employment associated with the alternatives. To the extent that proposed onsite housing associated with Alternative 2 (300 to 400 units) and Alternative 4 (400 to 450 units) would support Letterman Complex activities, the jobs–housing balance would be improved, thereby reducing transportation and related impacts. The greatest housing demand on regional housing would be 216 units (Alternative 5). Given the shortage of housing for low- and moderate-income groups in the city, this alternative (and Alternative 3) would have an adverse impact on any unmet demand for affordable housing in the city of San Francisco.

Traffic and Transportation Systems – Average daily traffic would increase by 1,960 external trips for Alternative 6 (No Action), by 4,280 to 5,140 external trips for Alternatives 2 through 5, and by 4,560 external trips for Alternative 1. The Gorgas Avenue Gate would be the primary entrance for Alternatives 1 through 5, with the Lombard Street Gate serving as a secondary entrance. For Alternatives 1 through 5, traffic at the Gorgas Avenue Gate would increase by a maximum of 600 vehicles, from 280 to 880, of which about 85 percent would be due to new development at the 23-acre site. For Alternatives 1 through 5, traffic at the Lombard Street Gate would increase by a maximum of 410 vehicles from the existing 1,170 to 1,580 vehicles during the p.m. peak hour, of which about 13 percent would be due to new development at the 23-acre site. Impacts would be avoided by implementing intersection improvements at Lyon Street/Richardson Avenue/Gorgas Avenue, Lombard Street/Lyon Street and Lombard Street/Presidio Boulevard. Parking demand would range from 580 (Alternative 6) to 1,440 spaces (Alternative 5), compared to the existing supply of 770

spaces at the 23-acre site. Transportation demand management measures would be implemented under every alternative to minimize parking space requirements and traffic volumes.

Cultural Resources – Removal of LAMC and infill construction consistent with Planning and Design Guidelines for new construction (Alternative 1) would have a beneficial effect on the historic setting. Continued use of the LAIR would only allow for partial restoration of the historic setting and therefore the facility would continue to have an adverse effect on the adjacent historic buildings along O'Reilly Avenue (Alternative 1). Removal of LAMC and LAIR and replacement construction (Alternatives 2 through 5) could reinforce historic patterns within the 23-acre site but would foreclose opportunities for infill construction on the remaining 60 acres of the complex which would have an adverse effect on the adjacent historic hospital buildings. The siting and massing of buildings along O'Reilly Avenue (Alternatives 2 through 5) could also have an adverse effect on the adjacent historic structures unless Planning and Design Guidelines for new construction are implemented.

Visitor Experience – Alternatives 1 through 5 would have a beneficial effect on the visitor experience. Each of the alternatives would include a central commons that would be developed as a public open space. Replacement construction would provide opportunities for public gathering places and locations for programs open to the public. The 23-acre site, as an integral part of the larger Letterman Complex, would be one of many sites throughout the Presidio which would "tell the story" of the Presidio in support of the five interpretive themes identified in the GMPA. Visitors would benefit through such actions as the rehabilitation of building 558 as a visitor information center, the introduction of information/orientation kiosks in central locations, the incorporation of interpretive information about the complex in public lobby spaces, and interpretive displays incorporated into the landscape at key spots. These improvements would increase public access and visitor opportunities considerably over what exists today for visitors.

Visual Impacts – The 23-acre site is not high in scenic quality. Should LAMC be retained (Alternative 1), the visual integrity of the complex would continue to be diminished and regional views would remain significantly affected. Demolition and removal of the LAMC, LAIR and parking lot (Alternatives 2 through 5) and the introduction of lower-scaled new construction would enhance the visual integrity of the Letterman Complex and improve the views from many vantage points within the Presidio. However, buildings located close to Lombard Street Gate would dominate entry views into the Presidio (Alternative 2), and historic view corridors at Edie Road (Alternatives 3, 4, and 5) and Thornburg Road (Alternative 4) would not be preserved unless Planning and Design Guidelines for new construction are implemented. For all alternatives, views into the 23-acre site from Lyon Street would be screened by the existing windrow.

Archeological Properties – An Archeological Management Assessment and Monitoring Program would be employed to ensure that all planned undertakings associated with Alternatives 1 through 5 would be reviewed by a qualified archeologist prior to implementation. An inventory study of known archeological sites in the area of each undertaking including test excavations would be conducted to determine whether significant sites or historic features are extant and whether construction might adversely affect archeological resources. Construction projects and ground-disturbing activities would be closely observed in the vicinity of sensitive archeological areas to discover, document, protect, and manage the archeological record. Reports of any

investigations would be submitted to the State Historic Preservation Office and the Advisory Council on Historic Preservation.

Wetlands and Stream Drainages – There are no wetlands on the 23-acre site. The drainage on the western edge of the complex has been altered through past construction by the Army and now drains directly into the restored Crissy Field wetlands area via the Presidio storm drain system. Alternatives 2 through 5 would have no negative effect on these reestablished wetlands or proposed restoration of the small section of riparian stream valley to complete the natural drainage from Tennessee Hollow to Crissy Field. Alternative 1 could impact the future restoration potential of the drainage. However, improvements including the design of walkways, landscaping, or structures would be prohibited within a stream buffer zone to protect the riparian corridor.

Native Plant Communities – There is no native vegetation on the site except for several stands of coast live oak trees. These trees would be protected through applicable management treatments and practices, including restricting the size of work areas, avoiding work when soils are wet and compaction-prone, and carefully training work crews to avoid potential impacts on vegetation.

Wildlife – American kestrels breed at the Presidio, and nesting pairs have been observed in palms near the LAMC prior to 1994. The palms also define the northern breeding limits for the hooded oriole, which nests in the trees. The large oak trees around the Letterman Complex provide excellent songbird habitat for a diversity of breeding and migrant birds, including a variety of flycatchers, warblers and vireos. These important habitat areas for birds would be protected and preventive measures would be implemented as necessary to avoid accidental habitat degradation during construction. In addition, all tenants would be educated and would implement integrated pest management options for managing the major pests found at the Presidio.

Topography and Soils – Construction impacts would be minor and temporary because the majority of soils that would be affected have been previously disturbed by human use. Best management practices (BMPs) would control erosion and contaminated runoff from the construction site, including use of turbidity barriers, silt curtains or equivalent measures. Monitoring and reporting of BMP performance and conditions before and immediately after the completion of work would be conducted.

Air Quality – Feasible control measures would be employed to minimize particulate matter (PM_{10}) emissions during construction. Vehicle trips associated with Alternatives 1 and 4 would result in regional operational emissions exceeding the Bay Area Air Quality Management District's significance thresholds for nitrogen oxides. Implementation of Transportation Demand Management measures would encourage alternatives to automobile use, and thus would contribute to improvements in air quality and lower nitrogen oxide emissions, but not to a level of insignificance. None of the alternatives would result in local operational air quality impacts exceeding the state ambient air quality standards for carbon monoxide.

Noise – Demolition and construction activities due to demolition of the LAMC (Alternatives 1 through 5) and LAIR (Alternatives 2 through 5) would generate intermittent noise of a short-term nature. Noise would be noticeable to residents within the adjacent San Francisco neighborhoods and recreational users outside the Letterman Complex, but because noise would be attenuated over distance and masked by unrelated urban noise, noise levels are not expected to be disruptive or exceed noise thresholds in the San Francisco Noise Ordinance.

Short-term use of impact tools and demolition activities could be disruptive to people within the Letterman Complex. Erecting barriers around construction equipment and restricting access to construction sites would reduce noise impacts to those closest to (i.e., within 250 feet from) construction equipment, but not to a level of insignificance. None of the alternatives would cause noticeable increases in traffic noise levels at existing sensitive receptors, and the traffic noise levels within the Letterman Complex resulting from the alternatives would be compatible with the proposed uses. None of the alternatives would cause significant stationary source noise impacts.

Recreation – Recreational facilities at the Letterman Complex currently include two tennis courts, a gymnasium and an indoor swimming pool that are maintained and operated by the YMCA. These facilities would remain opened to the public. Alternatives 2 through 5 would relocate the tennis courts onsite and new facilities would be provided. Development under all the alternatives would increase pedestrian and bicycle activity within and in the vicinity of the Letterman Complex. Planned improvements at the site would enhance the pedestrian and bicycle environment, and facilitate the direct flow of pedestrians and bicyclists to and from the complex.

Human Health, Safety and the Environment – Hazardous materials and hazardous substances defined under the Comprehensive Environmental Response, Compensation and Liability Act do not impact the Letterman Complex. The LAMC and LAIR are not identified as a Hazardous Substance Study Area under the GMPA. The prior fuel distribution system and associated storage tanks are being managed by the U.S. Army Corps of Engineers in accordance with state underground storage tank regulations. In 1993, the Nuclear Regulatory Commission completed confirmatory radiological surveys of the LAMC and LAIR as part of its termination process. These surveys documented contamination issues, confirmed that such contamination had been remedied to Nuclear Regulatory Commission standards, and determined that the surveyed facilities are suitable for unrestricted use. Asbestos and lead-based paint have been identified in the buildings and would require remediation. In addition, a contingency plan would be developed to address the potential for unidentified hazardous substances discovered during construction activities.

A tabular summary of the environmental consequences of each alternative is provided at the beginning of Section 4.

Major Issues Raised by Agencies and the Public

Contribution to Park Purposes and Relationship to GMPA – Concerns have been raised as to the consistency of the project with the GMPA. When the GMPA was drafted in 1994, there was public support for the GMPA's planning concept for the Letterman Complex, which anticipated that a single institutional user, such as the University of California at San Francisco (UCSF), would occupy the complex as an anchor tenant. Intended actions at that time included leasing of the 356,000-square-foot LAIR, demolition of the LAMC, and replacement of the LAMC square footage with approximately 450,000 square feet of new laboratories and educational facilities. The NPS entered into negotiations with UCSF (and others) for this space. No agreement was reached, however, and UCSF subsequently decided to locate its facility elsewhere in the city of San Francisco, at Mission Bay. No other suitable tenant has been identified for the existing facility that would

adhere to the GMPA's site-specific plan and have sufficient financial capability to contribute to the Trust's financial self-sufficiency mandate. To address these concerns, the Trust has approximated the scale and stature of development that would have been involved had NPS concluded a lease as proposed in 1994 with UCSF and has sought an appropriate use as identified in the GMPA or in related sectors reflecting evolving market conditions.

Compatibility of Design – Concerns were expressed during public workshops about the size, scale, height and density of buildings, and the focus of 900,000 square feet of development within the 23-acre site rather than infill construction spread throughout the 60-acre site which would reinforce the adjacent historic hospital complex's courtyard. To address these concerns, replacement construction must be compatible with other Letterman Complex buildings and with the adjacent neighborhoods, and must retain the park-like character of the Presidio. Planning and Design Guidelines must be completed before design of new construction proceeds. The maximum square footage for the Letterman Complex should not exceed the existing 1.3 million square feet, and the height of new buildings should be equal to or less than that of nearby structures with a maximum height of 60 feet.

Traffic, Noise and Parking – Because the site has been partially vacant for a number of years, neighbors would most likely be affected by increased activity at the 23-acre site and by additional noise and traffic in the vicinity. Traffic congestion is a serious problem on nearby city streets. Increased traffic to and from the site may contribute to this congestion. Parking space in the surrounding neighborhoods is in short supply. Concern was expressed that if parking demand at the complex exceeds capacity, people would park on nearby streets. Thus, the associated impacts of changing land uses on nearby residential neighborhoods, specifically the effects on traffic, noise and parking, must be addressed.

Precedent for Future Action/Cumulative Impacts – The Letterman Complex represents the single largest development opportunity to be offered at the Presidio. Concerns were raised that decisions made concerning the Letterman Complex would affect decisions about future actions and outcomes elsewhere in the Presidio, such as the Public Health Service Hospital, Fort Scott, and the Main Post. The Presidio Trust, which is the approval agency for development within nearly all built areas of the Presidio, will continue to use the GMPA as the foundation for its planning decisions while at the same time managing the property under its jurisdiction in accordance with the General Objectives of the GMPA, the purposes of the GGNRA Act, and other requirements of the Presidio Trust Act, including the application of sound principles of land use planning and management. Where changed circumstances or requirements of the Trust Act suggest the need for a site-specific departure from the GMPA, the Trust has noted its intent to undertake additional focused comprehensive planning to address these changed needs. Where the alternatives that are analyzed in this document depart from the 1994 GMPA's specific proposal for the Letterman Complex, the additional, different, or cumulative effects have been documented, analyzed, and considered. In addition, as lead agency under NEPA for all actions in the interior portions of the Presidio, the Presidio Trust is required to ensure that environmental factors and concerns are given appropriate consideration in its decisions and actions. Each action for construction, demolition, renovation or development at the Presidio will be reviewed under its own merits and will be subject to the appropriate environmental analysis under NEPA.

Issues to be Resolved

Concern was raised about the design review process for new construction and the level of public involvement in the process beyond this EIS. While the issue does not require resolution in this EIS, it is a matter of sufficient public interest to warrant discussion.

THE NHPA REQUIREMENT

In addition to the Trust's compliance with the NEPA process, which is the purpose of this EIS, of central importance to any project within the Presidio boundary that may have an effect on the National Historic Landmark district, is compliance with the National Historic Preservation Act (NHPA). Concurrent with actions to satisfy the NEPA process, the Trust has been engaged in activities designed to meet the requirements of the NHPA for the proposed project.

Section 110 of the NHPA sets out the broad historic preservation responsibilities of federal agencies to ensure that historic preservation is fully integrated into ongoing programs. Under Section 110(f), special protection is to be afforded to National Historic Landmarks. Under that provision a federal agency must, "to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm" to a National Historic Landmark that may be directly and adversely affected by an undertaking such as the proposed project.

Section 106 of the NHPA requires federal agencies to take into account the effects of their actions on historic properties and seek comments on its actions from an independent reviewing agency, the Advisory Council on Historic Preservation (ACHP). The revised regulations of the ACHP (Title 36 of the Code of Federal Regulations at Part 800) provide the methodology for assessing impacts on historic resources and detail the requirements of the consultation process. When a project is complex and is expected to continue over time, as is the proposed project, the regulations allow development of a Programmatic Agreement that governs ongoing and future activities undertaken as part of the project or program it addresses. Once a Programmatic Agreement is finalized, implementation of the Programmatic Agreement satisfies the agency's obligations under Section 106 and 110(f) of the NHPA. Pursuant to these regulations, the Trust has been engaged in consultation with the ACHP and the California State Historic Preservation Officer (SHPO) with regard to Section 106 compliance for the entire 60-acre Letterman Complex.

Although the guidelines are a tool for ensuring compliance with NHPA policies, neither the NHPA nor NEPA requires that they be made a part of the environmental analysis under NEPA. Nevertheless, the Trust elected to publish the planning level guidelines as part of this EIS so that the public would have a significant opportunity early in the development of the guidelines to provide comment and input prior to their final adoption. The purpose of conceptual Planning Guidelines is to ensure that any undertaking by the Trust is in keeping with the character of the Presidio's National Historic Landmark district and to provide a design framework for all expected actions in the 60-acre Letterman Complex. The Final Planning Guidelines in Appendix B provide measures to guide the continuing development of the Letterman Complex so that projects there would be compatible with the scale, architectural character, and pedestrian-friendly quality of the existing historic setting. Diligent attention to the Final Planning Guidelines will promote a sensitive integration of any new construction into the Letterman Complex's historic setting.

The Design Guidelines, which address more specific architectural and landscape issues for new construction, are now under development and must be submitted under the Programmatic Agreement (see below) for review and comment as part of the Section 106 consultation process. The Design Guidelines will incorporate the Final Planning Guidelines that have been publicly reviewed and finalized as part of this EIS. The Final Planning Guidelines will therefore be applied through the consultation and design review process under the Programmatic Agreement. Through the Programmatic Agreement process, the Planning Guidelines would continue to provide direction by their incorporation into the Design Guidelines and continuing review of their application by the ACHP, the SHPO, NPS, and the public after the environmental review process for an action is concluded. They have been prepared as a continuing interactive set of "guides" and, as guides, should not be viewed as rigid rules as the project moves through the process of negotiation, the signing of a lease, or the execution of a development agreement.

DESIGN REVIEW AND FUTURE PUBLIC INVOLVEMENT

Several key points occur in the planning and design process for public input, as well as agency consultation. The first opportunity for public input on new construction at the Letterman Complex was integrated early into the NEPA process. The Presidio Trust developed a set of draft Planning Guidelines, with public input, as a way to address potential adverse effects of new construction in the National Historic Landmark district. The Draft Planning Guidelines were included in the Draft EIS (Appendix B) and received public comment through that review process. Design Guidelines, a further refinement of the Planning Guidelines, were then posted on the Presidio Trust's web site and made available to the public in December 1999. A public workshop on the Design Guidelines was held on December 13, 1999 and public comment received until December 27, 1999. The Design Guidelines, which are now under development and must be submitted to the SHPO for review and comment, will incorporate the Final Planning Guidelines that have been publicly reviewed and finalized as part of this EIS.

Concurrently with developing the Final EIS and Final Planning Guidelines, the Presidio Trust has developed a Programmatic Agreement in consultation with the SHPO, ACHP and NPS regarding deconstruction, new construction, and the execution of associated leases at the Letterman Complex (Appendix F). Under Section 800.14 of the Code of Federal Regulations, the Presidio Trust has initiated the Section 106 consultation process through this Programmatic Agreement to ensure sustained involvement from the SHPO, ACHP, and NPS throughout the process of developing guidelines, conceptual design documents, and schematic design documents and into the construction phase. In addition, the Programmatic Agreement contains opportunity for public input at both the guideline development stage and the conceptual design phase for new construction. The Presidio Trust also plans to provide a public briefing at the design development phase.

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

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GLOSSARY

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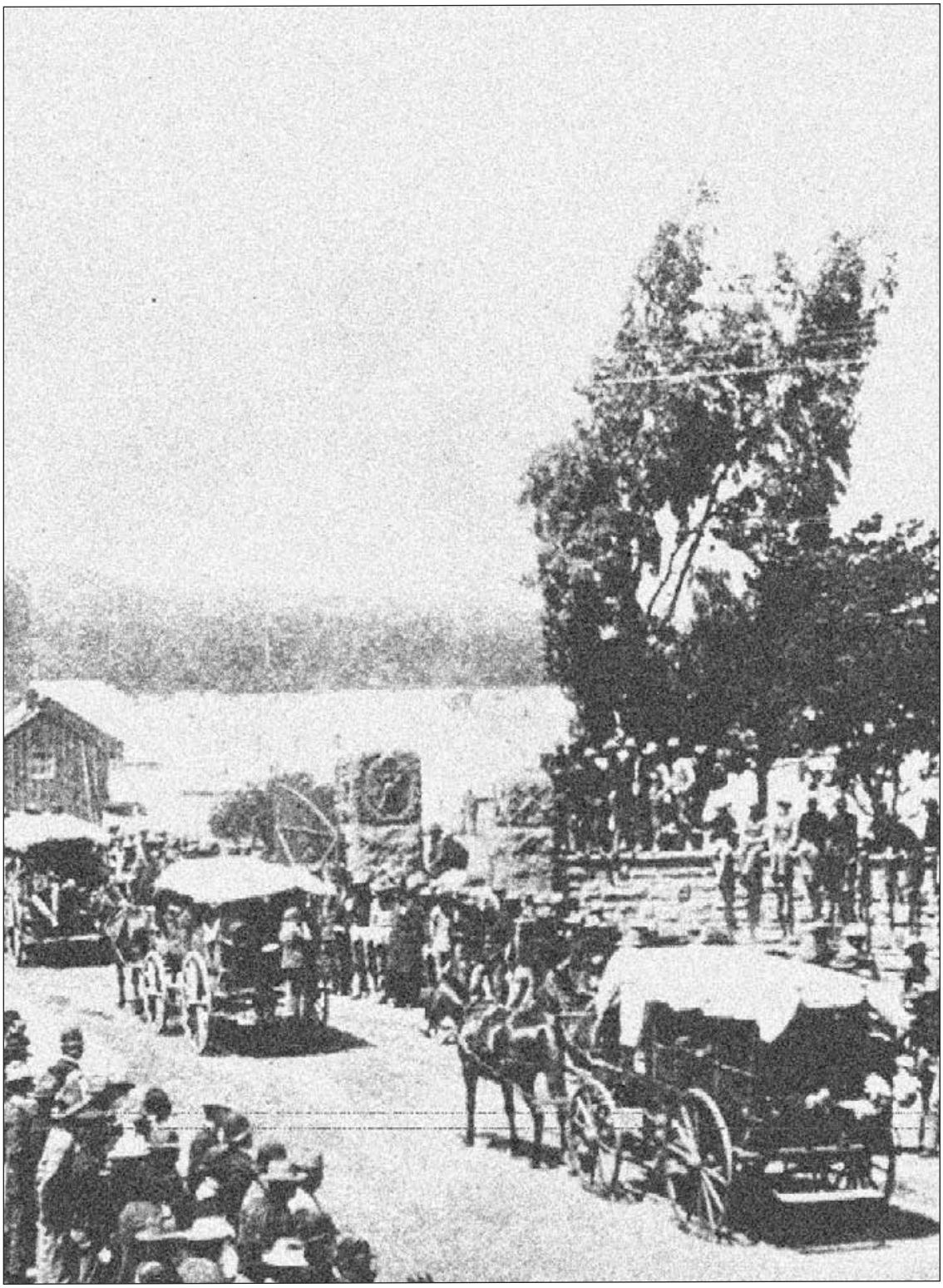
List of Acronyms

ABAG	Association of Bay Area Governments
ACHP	Advisory Council on Historic Preservation
AMA	Archeological Management Assessment
ANSI	American National Standards Institute
APE	Area of Potential Effects
ARPA	Archeological Resources Protection Act
AVR	average vehicle ridership
BAAQMD	Bay Area Air Quality Management District
BABC	Bay Area Bioscience Center
BAE	Bay Area Economics
BAR	Backen, Arrigone & Ross, Inc.
BART	Bay Area Rapid Transit
BMPs	Best Management Practices
BRAC	Base Realignment and Closure
C&D	Construction and Demolition
Caltrans	California Department of Transportation
CAP	Clean Air Plan
CARB	California Air Resources Board
CCR	California Code of Regulations
CCSF	City and County of San Francisco
CEQ	Council on Environmental Quality
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
cf	cubic feet
CFR	Code of Federal Regulations
CIWMB	California Integrated Waste Management Board
CMP	comprehensive management program
CO	carbon monoxide
CTA	San Francisco County Transportation Authority
CWA	Clean Water Act
DAC	Digital Arts Center
dB	decibel
dBA	A-weighted decibel
DHS	Department of Health Services
DOI	Department of the Interior
DOT	Department of Transportation
DPH	Department of Public Health
EA	Environmental Assessment
EIS	Environmental Impact Statement
EPA	U.S. Environmental Protection Agency
ESF	Environmental Screening Form
FHWA	Federal Highway Administration
FMP	Financial Management Program
FTE	Full Time Equivalent
FWCA	Fish and Wildlife Coordination Act
GAO	General Accounting Office
GGNRA	Golden Gate National Recreation Area
GMPA	General Management Plan Amendment
gpd	gallons of water per day

gpm	gallons per minute
GSA	General Services Administration
gsf	gross square feet
HASR	Historic Architectural Survey
HC	hydrocarbons
HCM	Highway Capacity Manual
ITS	Intelligent Transportation Systems
LAIR	Letterman Army Institute of Research
LAMC	Letterman Army Medical Center
LDA	Letterman Digital Arts Ltd.
LEED	Leadership in Environmentally Efficient Design
L_{dn}	24-hour average noise
L_{eq}	equivalent energy indicator
LOS	Level of Service
MEI	Maximally Exposed Individual
mgd	million gallons per day
ml	millimeter
MLPs	Maximum Load Points
MTC	Metropolitan Transportation Commission
MUNI	San Francisco Municipal Railway
n.d.	no date
NAGPRA	Native American Graves Protection and Repatriation Act
NAPP	Neighborhood Associations for Presidio Planning
NEPA	National Environmental Policy Act
NHL	National Historic Landmark
NHPA	National Historic Preservation Act
NO_2	nitrogen dioxide
NO_x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NRC	Nuclear Regulatory Commission
NRHP	National Register of Historic Places
P.L.	Public Law
PA	Programmatic Agreement
PHSH	Public Health Services Hospital
PM_{10}	particulate matter
$PM_{2.5}$	fine particulate matter
ppm	parts per million by volume
PSR	project study report
RCRA	Resource Conservation and Recovery Act
RFP	Request for Proposals
RFQ	Request for Qualifications
ROG	Reactive Organic Gases
RWQCB	Regional Water Quality Control Board
SamTrans	San Mateo Transit
SDC	Service District Charge
SFCTA	San Francisco County Transportation Authority
SFDPT	San Francisco Department of Parking and Traffic
SFFO	San Francisco Field Office
SFUSD	San Francisco Unified School District
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan

SO_2	sulfur dioxide
SPUR	San Francisco Planning and Urban Research Association
SWPPP	Storm Water Pollution Prevention Plan
TDM	Transportation Demand Management
UCSF	University of California at San Francisco
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
USPP	U.S. Park Police
VMP	Vegetation Management Plan
$\mu g/m^3$	micrograms per cubic meter



1. PURPOSE AND NEED

This section specifies the underlying purpose and need to which the Presidio Trust is responding in proposing and analyzing the alternatives for new development and uses at a 23-acre site within the Letterman Complex.

1.1 Background

The transfer of the Presidio of San Francisco from military jurisdiction represented a historic opportunity to preserve an area of incomparable beauty and historical significance for present and future generations. In seizing this opportunity, Congress recognized the Presidio of San Francisco as a unique site requiring unique and innovative management authorities and solutions.

1.1.1 THE UNIQUE PRESIDIO SITE

The Presidio is at the northern tip of the San Francisco peninsula on the south side of the Golden Gate. On its southern and eastern boundaries is the city of San Francisco, on the west the Pacific Ocean, and on the north the San Francisco Bay (Figure 1). The Presidio is 1,480 acres of unparalleled scenic beauty, dense forests, native plant communities, valuable wildlife habitat, expansive beaches and an extraordinary assortment of both non-historic and historic buildings and landscapes in a National Historic Landmark setting. With 220 years of military history captured in its buildings, natural features ranging from coastal bluffs to grasslands and forests, and abundant recreational opportunities, the Presidio is a unique place made even more remarkable by its location in the middle of a major urban metropolitan area.

The site has been a National Historic Landmark since 1962. As a former Spanish colonial military settlement founded in 1776 and a U.S. Army post from 1846 to 1994, the Presidio represents more than 200 years of military history under three nations' flags. Until its closure, the post played a logistical role in every U.S. military engagement since the Mexican-American War and supported America's global efforts during both the Spanish American War and World Wars I and II. With approximately 500 of the Presidio's buildings having historic and cultural significance, the site is a showcase of military architectural styles.

The complex of buildings, landscapes, and other features at the Presidio today provide evidence of how the site has been developed, occupied, and shaped over time. Of its total land area, about 700 acres are developed and 780 acres are open space. In 1994, at the time the Presidio was transferred from the Army to the U.S. Department of the Interior's National Park Service (NPS), there were 700 developed acres and over 870 buildings, representing approximately 6.3 million square feet of building space. In addition to office space, warehouses, and other facilities related to the former post's military mission, there are residential areas with more than 1,100 units of housing; an extensive infrastructure system including roads, water systems and electric utilities; community facilities; retail stores; and a wide range of recreation facilities, including tennis courts, gymnasiums, a bowling center, a theater, a swimming pool, a golf course, and a number of small playgrounds and athletic fields.

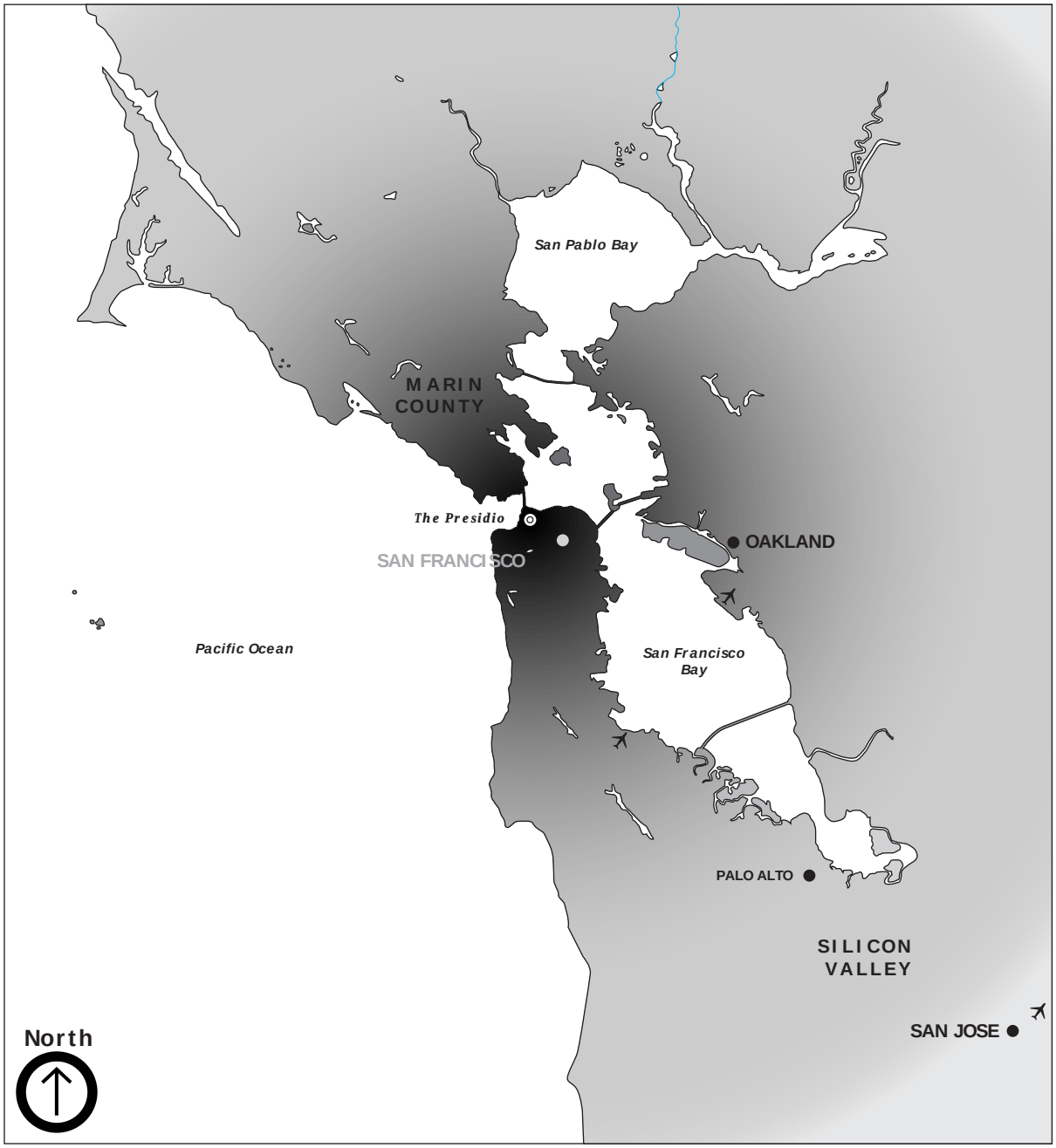


Figure 1.
Regional Setting

1.1.2 FROM MILITARY POST TO NATIONAL PARK

In 1972, Congress established the Golden Gate National Recreation Area (GGNRA), consisting of approximately 74,300 acres of shoreline areas of San Francisco and Marin counties, to preserve certain areas possessing outstanding natural, historic, scenic, and recreational values for public use and enjoyment in an urban environment. As a National Recreation Area, the GGNRA is under the administrative jurisdiction of the NPS. In the same law that created the GGNRA, U.S. Representative Phillip Burton successfully included a provision that the Presidio would become part of the GGNRA if the U.S. Department of Defense ever declared the base excess to its needs. In 1989, the Base Realignment and Closure Act designated 86 military bases, including the Presidio, for closure. When the Army departed in 1994, jurisdiction over the Presidio transferred to the NPS, thus realizing Representative Burton's earlier vision.

Planning for the transition of the Presidio from the Army to the NPS had been ongoing. In 1980, NPS had developed a General Management Plan to guide the overall management of the GGNRA (NPS 1980). As part of the planning process for the Presidio's transfer to the GGNRA, NPS released in October 1993, after three years of preparation, a Draft Amendment to the General Management Plan for the GGNRA and Draft Environmental Impact Statement (EIS) specifically for the Presidio. The Plan and EIS received extensive public review and comment both during its development and in the period after release. When the NPS completed and issued the final General Management Plan Amendment (GMPA) for the Presidio in July 1994, the GMPA laid out a vision for the future uses and management of the Presidio (NPS 1994a). While the GMPA included plans and designs for whole planning areas, such as the 60-acre Letterman Complex, NPS contemplated that more detailed site-specific plans and designs would be prepared and additional environmental analysis would be conducted as required. The site-specific analysis would be tiered on the Presidio-wide programmatic Final EIS.

The GMPA set forth land use plans for 13 distinct Presidio planning areas involving a varied mix of preservation, rehabilitation, demolition, and new construction. Although the majority of buildings had contributed to the Presidio's beauty and its designation as a National Historic Landmark, other buildings contributed little to the history or aesthetics of the site. The GMPA therefore called for 348 historic buildings to be rehabilitated for new uses, 276 buildings totaling 1.5 million square feet to be removed, and both public and private organizations to establish a mix of uses, with an emphasis on those relating to social, environmental, and cultural issues. The GMPA assumed that the Sixth Army would continue to use approximately 30 percent of the Presidio's square footage of building space, including about half of the available housing. Shortly after NPS completed the GMPA, however, that aspect of the plan changed when the Sixth Army decided to permanently vacate the Presidio entirely. Thus, although the GMPA was wide-ranging in its scope and specificity, even as it was being finalized, certain assumptions and circumstances on which the planning had been premised changed in response to factors unforeseen at the inception of the GMPA's development.

1.1.3 INNOVATIVE APPROACHES AND AUTHORITIES FOR THE PRESIDIO

The comprehensive plan set forth in the GMPA presented the difficult issue of how the GMPA would be funded. NPS projected the total annual cost of managing the Presidio to be about $40 million, making it the most expensive park managed by NPS (U.S. Congress 1995b). (By comparison, NPS estimated the cost to operate the next most costly park, Yellowstone National Park, at $20 million annually.) An important element of this cost was the existing state of disrepair of the buildings and infrastructure at the Presidio. After the Army's departure, almost none of the Presidio met existing standards for utilities, earthquake protection, or

building codes. Without substantial capital improvement, the buildings and infrastructure would further deteriorate and become unusable. A number of cost estimates were developed based upon the development plans in the GMPA. Congressional estimates showed the total development costs for the Presidio to be $741 million, bringing the total cost of implementing the GMPA for both operations and capital improvements to $1.3 billion ($600 million for operations ($40 million/year for 15 years) plus $741 million for development) (U.S. Congress 1995b). NPS estimated the total development costs of the GMPA at about $490 million (NPS 1994f). NPS planned to fund these costs through a mixture of lease revenues, private philanthropy, tax credits, and other federal agencies, combined with approximately $16 to $25 million in continuing annual federal appropriations (NPS 1994f). In view of these projections, one of Congress's major issues at the Presidio was its overall cost. Congress was unwilling to commit the amount of federal monies, either capital or operating costs, needed over the long-term to protect and maintain the Presidio, but was willing to create an innovative public-private entity that would be charged with achieving these goals.

NPS, too, had considered innovative means to implement the plan for the Presidio, specifically proposing in the GMPA itself a federally chartered partnership institution to carry out the repair, leasing, and management of properties and the fund-raising needed to sustain the Presidio. While the NPS had inherited properties from the Department of Defense in the past, it had never received a property as large and as complex as the Presidio, requiring management of such a large array of buildings, housing, and infrastructure. Early in the planning process, therefore, the NPS recognized that managing the Presidio would require skills not typically held by NPS personnel, including property management, leasing, real estate, and finance, and authorities traditionally beyond the reach of NPS's enabling statutes. The Presidio would require unique authorities such as the ability to generate and retain revenues, and the ability to borrow money to finance repair and rehabilitation of historic structures, and would require flexibility in operating procedures in order to secure tenants in an ever-changing market environment. To implement the plan, the GMPA proposed establishment of a trust to manage those aspects of the GMPA outside of NPS' expertise.

1.1.4 CREATION OF THE PRESIDIO TRUST AND ITS UNIQUE MANDATE

Using as its foundation the NPS's plan for a federally chartered partnership institution, in 1996 Congress established the Presidio Trust pursuant to the Presidio Trust Act (Title I of Public Law 104-333) (Trust Act, provided in Appendix H). The Trust Act was Congress' response to a number of competing public policy goals, including concerns about the high costs of the Presidio in relation to other units of the national park system, the need to reduce the costs of the Presidio to the federal government, and the desire that the Presidio should be retained within the GGNRA rather than sold as federal surplus property. The legislation therefore devised a means to preserve and protect a nationally significant cultural and natural resource while also requiring generation of sufficient revenue from the park's operations to eliminate by 2013 the need for federally appropriated funds. In devising the Trust as the means to achieve these goals, Congress provided only a limited budget, which would incrementally decrease to zero over 15 years, and provided no funds targeted for needed capital expenditures. Thus, although NPS had projected the need for hundreds of millions of dollars in capital expenditures and tens of millions in annual operating costs, Congress charged the Trust with accomplishing

these dual policy goals with an insufficient capital budget and with only a temporary and partial operating budget.[1]

To achieve these complex goals within Congress's funding constraints, the Trust Act includes unique mandates and authorities for application at the Presidio. The Presidio Trust is a wholly-owned federal government corporation whose purpose is to preserve and enhance the Presidio as a national park and to ensure that the Presidio becomes financially self-sufficient by 2013. The Presidio Trust is managed by a seven-person Board of Directors with diverse expertise including environmental preservation and compliance, legal, and real estate planning and development. Six members of the Board are appointed by the President, the seventh member is the Secretary of the Interior or the Secretary's designee.

The Presidio Trust assumed administrative jurisdiction of the built areas of the Presidio, including the Letterman Complex, on July 1, 1998. It brings to the built areas of the Presidio experience in real estate leasing, finance, development and property management.[2] The Trust will apply this expertise to lease more than 3 million square feet of new and historic building space and more than 1,100 housing units in the Presidio. The Presidio Trust retains the revenues from its operation and management of the Presidio properties that are under its administrative jurisdiction. The NPS retains administrative jurisdiction of the coastal area of the Presidio and, in cooperation with the Presidio Trust, provides visitor services and interpretive and educational programs throughout the Presidio.

Like other federal government entities, the Trust is required to carry out its mission in compliance with the National Environmental Policy Act (NEPA). Under the Presidio Trust Act, the Presidio Trust is considered the successor-in-interest to the NPS for purposes of compliance with NEPA. Thus, to the extent that the Trust seeks to implement proposals that have been previously adequately analyzed under the GMPA EIS, the Trust may rely upon that earlier analysis. Where, however, the Trust's proposals depart from the plans previously analyzed under NEPA, the Trust undertakes further environmental review consistent with the requirements of NEPA, the National Historic Preservation Act (NHPA), and other relevant environmental review laws and executive orders. Pursuant to interagency agreement, the NPS is considered a "cooperating agency" for the preparation of this NEPA document and has submitted comments on the document for consideration by the Presidio Trust as the lead agency.

1.1.5 THE GMPA – MASTER PLANNING DOCUMENT

The GMPA is the foundational plan that guides the Trust's planning and decision-making. Its importance has been reinforced by both the Trust Act and Trust policy. The Trust Act directs the Presidio Trust to manage the property under its administrative jurisdiction, including the Letterman Complex, in accordance with the purposes of the Act establishing the Golden Gate National Recreation Area and in accordance with the "general objectives" of the GMPA.

[1] The primary means for the Trust to generate revenue is by leasing Presidio buildings. In order to do so, capital improvements to buildings and park-wide infrastructure are necessary to bring poorly maintained or functionally obsolete Presidio facilities into appropriate condition for current use. The Trust Act provides for a limited amount of near-term appropriations to fund both operating and capital expenses and access to a capped amount of Treasury borrowing to assist in funding capital costs during the initial 15-year period leading to self-sufficiency. Funds borrowed for capital expenditure must be repaid.

[2] In general terms, the Trust approaches leasing in two different ways. In some leases, the Trust seeks a tenant who can obtain and use private capital to fund development or rehabilitation costs in return for rent savings for a specified period. In other leases, the Trust must itself fund the capital improvements needed to bring buildings into marketable condition and, in turn, receives market rent from the tenant.

The purposes of the GGNRA Act are clear and are stated in its preamble as follows:

> *In order to preserve for public use and enjoyment certain areas of Marin and San Francisco Counties, California, possessing outstanding natural, historic, scenic, and recreational values, and in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning, the Golden Gate National Recreation Area is hereby established. In the management of the recreation area, the Secretary of the Interior shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management. In carrying out the provisions of this Act, the Secretary shall preserve the recreation area, as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area.*

By comparison, the general objectives of the GMPA are not precisely identified either within the text of the GMPA itself (i.e., no list of "general objectives" appears in the document) or by Congress in the Trust Act. It was therefore up to the Trust to ascertain the meaning of the term used in the Trust Act.

Although early drafts of the Act required the Trust to manage the Presidio in accordance with the GMPA, the term "general objectives" was added in the final version of the Trust Act that became law. Early versions of the Trust Act did not include the requirement that the Presidio become financially self-sufficient by a certain time. Once the Act incorporated the restriction on federal appropriation and a specific time constraint for achieving self-sufficiency, the term "general objectives" was added to give the Trust some needed flexibility to reach the Act's self-sufficiency goal. By its directive to follow the "general objectives" of the GMPA, Congress intended to afford the Trust with that flexibility by not obligating it to follow the Plan in all its specifics.

To ascertain the GMPA's "general objectives" as intended by Congress, the Trust looked first to the GMPA itself. Rather than looking only to the GMPA to ascertain the meaning of the term, the Trust also looked to the Trust Act and its legislative history to help inform its interpretation. Congress explicitly did not accept the GMPA as a governing document in all its particulars because of its economic requirements and the changing circumstances already evident in 1996 when the Trust Act became law (U.S. Congress 1995b) (see also Sections 1.1.2 and 1.1.3). While recognizing the significant work that the NPS had accomplished in creating the GMPA, Congress also recognized the Trust's need for flexibility in light of these changing circumstances and its mandate that the Presidio Trust achieve financial self-sufficiency within 15 years. The interpretation of Congress's intent therefore would require a reconciliation of these competing elements. Following an administrative process in which the Trust Board looked to a number of specific sentences and phrases from various portions of the 150-page GMPA, including its site-specific programmatic goals for each planning area, the Presidio Trust Board of Directors adopted and set forth the general objectives of the GMPA in its Board Resolution No. 99-11 dated March 4, 1999 (General Objectives).

In the exercise of its administrative discretion, the Presidio Trust Board of Directors has identified the following as the General Objectives of the GMPA:

1. To preserve and (where appropriate) enhance the historical, cultural, natural, recreational, and scenic resources of the Presidio;

2. To address the needs of Presidio visitors, tenants and residents for community services such as transportation, water, power, waste management, and public safety (among others) in an environmentally responsible manner, while respecting neighboring communities;

3. 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 scientific discovery, recreation, the arts, education, research, innovation and/or communication; and

4. To sustain the Presidio indefinitely as a great national park in an urban setting.

This statement of the General Objectives of the GMPA tracks closely the "park-wide goals and objectives" articulated by the NPS in its 1994 Request for Qualifications (RFQ) for the Letterman Complex (see Section 1.1.7). NPS summarized the park-wide objectives as: 1) to promote environmental stewardship and sustainability; 2) to encourage cross-cultural and international cooperation; 3) to provide community service and restoration; and 4) to promote health and scientific discovery (NPS 1994c). This early statement of goals and objectives by NPS, in its similarity to the objectives ascertained by the Trust, exemplifies the way in which the General Objectives of the GMPA incorporate and expand upon the NPS' earlier formulation. Each NPS objective is incorporated among the objectives ascertained by the Trust.

The Trust's adoption of the General Objectives of the GMPA reinforces the importance of the GMPA as the foundational planning document for the Presidio. Although the General Objectives of the GMPA, not its specific plans, are the required guideposts for future development of the Presidio, the Trust continues to use the GMPA as the foundation for its planning decisions. It is the master document that guides the Trust in decision-making, despite the fact that changed conditions at times require the Trust to reassess certain of the GMPA's site-specific plans and programs. In sum, as a matter of law, the Presidio Trust follows the General Objectives of the GMPA. As a matter of policy, the Trust uses the GMPA as its principal guide for all planning activities, whether establishing planning priorities, or managing resources.

Given the Trust's reliance on the GMPA as the foundational planning document, NEPA does not require development of a new comprehensive plan for this Supplemental EIS. Nevertheless, both NPS and the public have expressed desire for the Trust to better explain how it intends to implement the GMPA Presidio-wide in view of the need under some circumstances to depart from the site-specific proposals of the GMPA. The Trust believes that the best means to understand the Trust's approach to GMPA implementation is to undertake certain additional comprehensive planning that tiers off the GMPA. In proposing this undertaking, the Trust acknowledges and wishes to respond to the strong sentiment of NPS as a cooperating agency and the public generally to clarify the Trust's Presidio-wide approach to circumstances that have changed since finalizing the GMPA and to the specific comprehensive program elements of Section 104(c) of the Trust Act. The Trust has made no decisions on the scope of such comprehensive planning, but expects future public sessions to involve the interested community in helping to define both its scope and content.

1.1.6 THE PRESIDIO'S LETTERMAN COMPLEX

The Letterman Complex, located in the northeast corner of the Presidio of San Francisco, is in close proximity to the city of San Francisco at the Lombard Street Gate, and is one of the most urbanized of Presidio places (Figure 2). Consistent with the historic use of the site, the Letterman Complex was designated under the Presidio GMPA as one of the "building and activity cores" where building demolition and replacement construction would occur.

The southeast corner of the Letterman Complex has long been an urbanized building and activity center at the Presidio. The original Letterman Hospital was constructed beginning in 1898 to accommodate soldiers during the Spanish-American War. Construction of the original hospital complex was designed as a 300-bed pavilion-style hospital with buildings, including wards, administrative buildings, operating theater, kitchen and mess halls arranged symmetrically around a centrally planted quadrangle. By 1904, additional buildings were constructed within and around the quadrangle.

The land selected for construction of the new hospital came face-to-face with the city of San Francisco boundary. Non-military business enterprises at the Presidio's eastern edge, such as public resorts, attracted citizens to the Presidio's border and offered recreation to Army personnel as early as the 1860s. Rail service connected people to these resorts, and with the establishment of the new hospital, a cable car line was brought into the Presidio as an extension of the Greenwich Street line, terminating in front of the main hospital building and connecting the Presidio to the city.

Following the 1906 earthquake, to showcase the revival of San Francisco, the Army allowed a significant portion of the Panama Pacific International Exposition to be placed within the boundaries of the Presidio. The Exposition occupied all of the current 23 acres to the east of the original hospital (the East Hospital site) and extended into the Gorgas Avenue warehouse area and into Crissy Field. Work began on the site in 1912 and opened to the public in 1915. The Palace of Fine Arts and the layout of the streets in this area remain to this day.

During and after World War I, the Letterman Hospital expanded significantly with a new ancillary hospital (East Hospital) and new quarters, support services buildings, and roads built during this time to support large numbers of patients arriving from the Philippines, Hawaii, China, and western military installations. By 1942, during the second World War, Letterman was one of the busiest military hospitals in the country and continued to expand into both new and temporary structures. This period represents the maximum building density on the site. The Letterman Hospital Complex was like a self-contained city within the Presidio.

After World War II, the military started planning for a more modern hospital at the site. Between 1965 and 1976, much of the original hospital quadrangle buildings and all of East Hospital were removed to make way for a new, more modern structure. In 1968, the Letterman Army Medical Center (LAMC), a new 550-bed, 10-story building, was constructed. Between 1971 and 1976, the Army constructed the Letterman Army Institute of Research (LAIR). By this time, the hospital's role had changed from serving wounded soldiers to serving the military community living in the region as a regional medical center. However, since the Army's departure from the Presidio in 1994, the LAMC and LAIR facilities have remained essentially vacant.

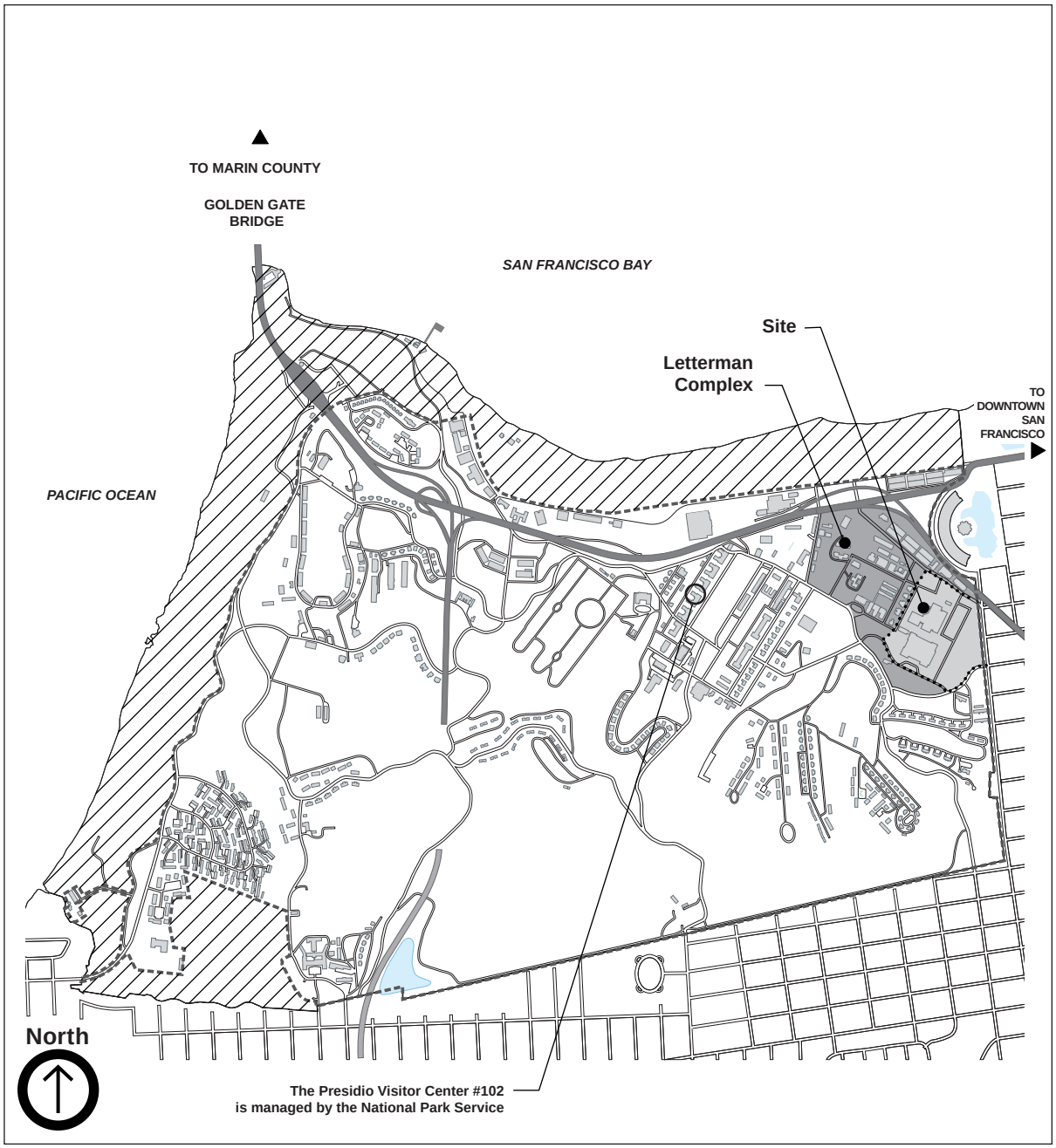


Figure 2.
Site Location Map

60-Acre Letterman Complex

23-Acre Site

Area A. Managed by the National Park Service

Area B. Managed by the Presidio Trust

Today, the Letterman Complex continues to be a predominantly developed site that includes approximately 50 buildings, both historic and non-historic, totaling approximately 1.3 million gross square feet of building space within a 60-acre campus-like setting. The bulk of that space is contained in two non-historic, physically dominant, modern multi-story structures within 23 acres at the southeast portion of the complex: the LAIR (or research institute), a 356,000-gross-square-foot former Army medical research facility with laboratory space, offices, and support space; and the LAMC (or medical center), a 451,000-gross-square-foot former general acute care hospital. The LAIR building, constructed in three phases between 1972 and 1976, includes three structurally independent buildings joined by common halls and a central atrium to form three distinct functional areas. LAIR is considered uneconomical to reuse because of layout problems and functional obsolescence (BAR 1993). LAMC, built in 1968 under the provisions of the 1964 Uniform Building Code, is now considered outdated for use as an acute care hospital. When LAMC and LAIR were constructed on the site of the former East Hospital, they blocked or compromised historic view corridors, and the buildings' height, scale, mass, and materials contrast sharply with the surrounding historic setting. The remainder of the 23-acre site is occupied predominantly by paved surface parking lots.

The remaining square footage in the Letterman Complex is contained in an assortment of historic warehouses, clinics, wards, offices and ancillary buildings, including the Gorgas Avenue warehouses, gymnasium, non-historic dormitories and the 158,000-square-foot Thoreau Center for Sustainability, currently leased to a diverse group of predominantly non-profit organizations, which is housed within the historic buildings that comprise the remaining elements of the original Letterman Army Hospital. The Letterman Complex also contains additional surface parking lots, landscaped areas, and approximately two miles of roadways.

1.1.7 THE LETTERMAN COMPLEX – LEAD PROJECT AND ECONOMIC ENGINE

When the legislation creating what ultimately became the Presidio Trust stalled late in the 103rd Congress and with the Presidio buildings and infrastructure in critical need of rehabilitation and repair, Congress enacted interim legislation (Public Law 103-175) permitting NPS itself to begin generating revenue from the Letterman Complex (about 1.3 million square feet). The NPS estimated that it would receive between $6 million and $12 million annually in lease revenues from the Letterman Complex, some of the most commercially viable real estate within the Presidio (U.S. Congress 1995b). The legislation granting NPS leasing authority allowed NPS to retain these revenues for the purpose of defraying the capital and operating costs associated with the management of the Presidio.

Through a 1994 Request for Qualifications (RFQ), NPS solicited potential users for the 60-acre Letterman Complex (NPS 1994c). From among the 16 responses, NPS chose to enter into lease negotiations with the University of California at San Francisco (UCSF) to occupy the hospital and research facilities within the 23 acres at the southeast portion of the site. When these negotiations broke down, the next best RFQ respondent, the State of California Department of Health Services (DHS), had already made other arrangements to relocate in Richmond, California. As a fallback, NPS negotiated with the City of San Francisco Department of Public Health (DPH), but here too was unable to conclude lease terms. Although ultimately unsuccessful in concluding the lease negotiations with UCSF, NPS did complete leases on approximately 158,000 square feet (approximately 14 percent of the RFQ offering) within other portions of the Letterman Complex. As a result of this early leasing activity within the Letterman Complex, today, the Thoreau Center for Sustainability occupies the former general hospital wards adjacent to the hospital and research facility, which showcases state-of-the-art

energy conservation and sustainability technologies and is home to more than 50 tenant organizations. The initial legislation under which the NPS concluded these leases was intended to provide interim authority until the pending legislation establishing the Presidio Trust was enacted.

The Trust had the new Trust Act mandates in mind when it returned to the implementation of the planning process that the NPS had started several years earlier when it issued its 1994 RFQ for the Letterman Complex.

1.2 Underlying Purpose and Need

The Trust Act's financial self-sustainability mandate sets the Trust's decision-making process for the Letterman Complex apart from what had been originally contemplated under the GMPA, and gives the proposed project an urgency not previously required. Consistent with the congressionally required Financial Management Program for the Presidio, a financial forecast detailing how the Trust plans to achieve the Act's self-sufficiency requirement, the proposed project is intended to serve as an economic engine, generating early and significant revenue to pay for capital improvements and historic building rehabilitation that, in turn, will allow revenue generation at other areas of the Presidio.

1.2.1 CONSISTENCY WITH THE TRUST ACT MANDATES

At the threshold, the Trust must carry out its proposals, including the proposed project, in accordance with its congressional mandates. Although the Presidio is part of the national park system, many of the Trust Act requirements differ significantly from those that NPS must meet in managing property under its administrative jurisdiction, and were not anticipated by the drafters of the GMPA during its development. These directives were therefore not addressed in the planning process that resulted in the GMPA, making certain specifics of the GMPA difficult to implement consistently with the Trust Act. The Trust Act mandates are, however, a necessary element of the Trust's decision-making process as it has moved forward with Letterman Complex planning and with the Supplemental EIS for the 23-acre site. Certain key mandates include:

- First, the Trust must manage its portion of the Presidio in such a way as to become financially self-sufficient by 2013 — that is, to generate sufficient revenue without any federal appropriation to fund the capital, operating, and long-term maintenance costs for the Presidio. If the Trust is not successful in meeting this goal by the deadline, the Presidio property under the Trust's administrative jurisdiction will revert to the General Services Administration for disposal (Trust Act Section 104(o)). In adopting this requirement, the House Committee on Resources noted that its "greatest concern . . . has been the cost of the Presidio. The Committee cannot support funding levels for the Presidio as proposed in the NPS plan [the GMPA]" (U.S. Congress 1995b).
- Second, consistent with the 2013 deadline, Section 104(n) of the Trust Act requires the Trust, in selecting tenants, to give primary emphasis to those that enhance the financial viability of the Presidio and facilitate the cost-effective preservation of historic buildings. In adopting this criterion, the House Committee on Resources noted that it was "concerned that strict adherence to potential tenants targeted in the Presidio general management plan will result in leases that are substantially below market value and which will seriously undermine the financial viability of the Trust. Accordingly, the Committee believes that selection

of tenants which enhance the financial viability of the Presidio is the most important criteria to be used in the tenant selection process" (U.S. Congress 1995b).

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

Other requirements involve obtaining reasonable competition and reducing costs to the federal government. Specifically, Section 104(b) provides that with respect to lease agreements and other agreements for use and occupancy of Presidio facilities, the Trust must obtain reasonable competition. Further, Section 104(n) concerning leasing requires the Trust to consider the extent to which prospective tenants contribute to the reduction of cost to the Federal Government.

1.2.2 ACHIEVING FINANCIAL SELF-SUFFICIENCY

The project proposed in this Supplemental EIS is needed to achieve the mandates of the Presidio Trust Act — most importantly the mandate that the Presidio become financially self-sufficient by 2013, while being managed in accordance with the General Objectives of the GMPA.

The Financial Management Program – Congress not only set the self-sufficiency requirement, but also required the Trust, among its first official acts, to present to Congress its plan for achieving the mandate. Pursuant to the requirements of the Trust Act, by July 8, 1998 the Trust presented to Congress a Financial Management Program (FMP, provided in Appendix E) detailing how the Presidio would become independent of federal appropriations within 15 years after the first meeting of the Trust Board of Directors (i.e., by July 8, 2013). Building upon the GMPA, which was a comprehensive programmatic plan for the Presidio, the FMP was to serve as the budgetary program for meeting the newly imposed financial self-sufficiency requirements of the Trust Act.

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

With regard to costs, operating the Presidio long-term requires maintenance of 780 buildings, 1,000 acres of open space, roads, utility systems, and all other aspects of maintaining a park and community without access to federal appropriations or taxation as a source of revenue. To support the Presidio long-term, the annual cost of operations and replacement reserves is forecasted in the FMP at $35.7 million (all FMP projections are in 1998 dollars). This cost includes the projected annual operating budget of $24 million, which is based upon the 1998 NPS budget, with a minimum 20 percent reduction for operating efficiencies expected under the Trust's

streamlined authorities. It also includes an annual set aside of $11.5 million to build a fund that will pay for long-term capital improvements to both buildings and natural areas.

With respect to revenues, in order to break even by 2013 with a small margin, the FMP forecasts the need for $36.6 million of annual revenues.[3] The Trust's primary source of ongoing revenue to support this cost is revenue from the lease of residential and non-residential real estate. Lease revenues account for $35.6 million of the $36.6 million annual total, and the proposed project lease is expected to be the single largest non-residential component (by 2.5 times) of the revenue needed to meet the financial self-sufficiency plan of the FMP. With respect to total revenue needed to meet the financial self-sufficiency plan of the FMP, the proposed project is expected to yield minimum annual ground lease revenue[4] of $5 million, accounting for one-third of non-residential lease revenues needed or 14 percent of the total lease revenues.[5] To provide the revenue stream to make the capital investments needed to assure the revenue targets in the FMP are met, this revenue stream must start early, phased in over several years beginning in 2000. Further, the LAMC/LAIR tenant must be financially capable of funding more than $200 million in capital costs to redevelop the LAMC/LAIR facilities.

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

The Letterman Complex as the Presidio's Economic Engine – In developing the FMP, the Trust used as its starting point the general land use categories of the GMPA and the financial information and studies that were prepared to support the GMPA, including NPS's July 1994 building leasing and financing implementation strategy (NPS 1994f). This supplement to the GMPA set forth NPS's financial strategy for implementing the GMPA, and it identified the Letterman Complex as the priority project at the Presidio. It viewed the LAMC/LAIR facilities, under the market conditions at the time, as the ideal project to fuel capital improvements elsewhere on the Presidio.[6]

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

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

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

[6] The leasing and financing strategy revalidated the early assumptions of NPS's approach. As discussed in Section 1.1.7 above, Congress gave NPS special legislative authority in 1993 to lease the facilities within the Letterman Complex, and NPS moved forward to solicit potential project proponents in its 1994 Request for Qualifications, prior to final adoption of the GMPA. In response to the RFQ, NPS entered into long-term lease negotiations with the University of California at San Francisco Medical Center (UCSF), but was ultimately unsuccessful in completing a transaction. UCSF later decided to relocate to a site at Mission Bay south of San Francisco, and the LAMC/LAIR facilities have remained essentially vacant ever since.

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

In recognition of the importance of the Letterman Complex to the Presidio's self-sufficiency, as acknowledged in the GMPA's building leasing and financing strategy supplement, soon after establishment of the Trust, the Presidio Trust Board of Directors at its October 31, 1997 meeting authorized a study to update the redevelopment potential of the Letterman Complex (Board Resolution 98-3). The Board recognized that the market conditions in the Bay Area had changed drastically from 1994 when NPS negotiated with UCSF, and believed that an updated market analysis was necessary to fully evaluate the Letterman Complex's contribution to the self-sufficiency directive and the other Trust mandates. The resulting January 1998 study concluded that the Letterman Complex would be very competitive in the market, given a scarcity of campus-type locations in San Francisco and the inner Bay Area; that there was a window of opportunity to market the site, given the improving strength of the market; and that a ground lease supporting 900,000 square feet of new construction could generate at least $3.5 million (Mancini-Mills 1998a). Subsequent market updates assumed a range of $3.8 million to $5.7 million for the opportunity (Mancini-Mills 1998b). Therefore, in March of 1998, based in part on the conclusions of these studies, the Trust adopted a real estate policy that clearly establishes the Letterman project as a priority for early implementation (Board Resolution 98-18). It was this early reanalysis of the potential financial contribution of the LAMC/LAIR site that served to update and refine NPS's earlier financial analysis of the Letterman Complex and inform the Trust's July 1998 FMP and subsequent Letterman RFQ.

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

The FMP Establishes the Proposed Project Parameters – The FMP served to establish the parameters of the proposed project. These parameters — demolition of LAMC/LAIR and 900,000 square feet of replacement construction — were made part of the Trust's Letterman RFQ and are currently under study in this EIS. In its RFQ, the Trust solicited a project calling for the demolition of the functionally obsolete LAMC/LAIR buildings. Demolition would be followed by redevelopment and use of newly constructed low- to mid-rise, or lower-profile mixed-use buildings totaling approximately 900,000 square feet and some infrastructure improvements within a 23-acre site within the Letterman Complex. The Presidio Trust, as the approval agency for the proposed project, would enter into a long-term ground lease and development agreement with a master

tenant/development team to build and occupy the approximately 900,000 square feet of new replacement space on 23 of the 60 acres within the complex (Figure 3). Congress's command to establish the financial forecasts of the FMP, therefore, set not only the expected financial return but also indirectly set the square footage needed for the proposed project.

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

With respect to the 900,000 square feet, the FMP assumed the majority of the square footage would derive from demolition and replacement of both LAMC and LAIR.[7] The failed NPS leasing initiative, marketing analysis, and the Trust Act requirements supported this FMP assumption. At the time of the NPS's 1994 RFQ and prior to finalizing the GMPA, LAIR was perceived to have a ready market to continue in its research use and the GMPA proposed it for reuse. The failed negotiations with UCSF and the State DHS and the new unavailability of the city's DPH created real uncertainty about the possibility of finding a user for the existing facilities. Further, reuse barriers existed because of the high cost of rehabilitating LAMC to acceptable seismic standards for reuse as a laboratory and research facility and layout and other functional obsolescence problems at LAIR (BAR 1993).[8] The GMPA acknowledged this uncertainty by identifying the Letterman Complex, as compared to other Presidio planning areas, as an area where change in use could occur through new replacement construction if existing buildings and improvements do not meet essential program and management needs. When these factors were considered with the updated leasing analysis showing a substantially expanded Bay Area market for campus-setting developments and with the Trust Act requirement to consider reasonable competition in leasing, the FMP assumption to demolish both LAMC and LAIR was seen as rational for FMP forecasting purposes.

23-Acre Site – Once the FMP had established the need for a 900,000-square-foot project, focusing the proposed project within the 23-acre site was considered by the Trust as most consistent with the FMP's financial planning parameters. In making this decision, the Trust evaluated and relied upon a number of factors. To obtain the

[7] The proposed 900,000 square feet of new replacement construction approximates buildings on the 23-acre site. The existing medical center and research institute on the 23-acre site total 807,000 square feet. In addition, two other non-historic support structures on the 23-acre site totaling 33,000 square feet have been identified for removal. (All square footages are approximate, based primarily on previous U.S. Army measurements.) Within the 60-acre Letterman Complex, NPS had already removed 23,000 square feet, and an additional 13,000 square feet of unleased, non-historic building space could be removed, as set forth and studied in the GMPA EIS. With these removals, the total square footage available for the proposed project is approximately 876,000 square feet. The Trust approximated this square footage by soliciting development proposals of 900,000 square feet of replacement construction, while pledging that in the end the amount of occupied square footage at Letterman would not exceed the 1.3 million total studied in the GMPA EIS.

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

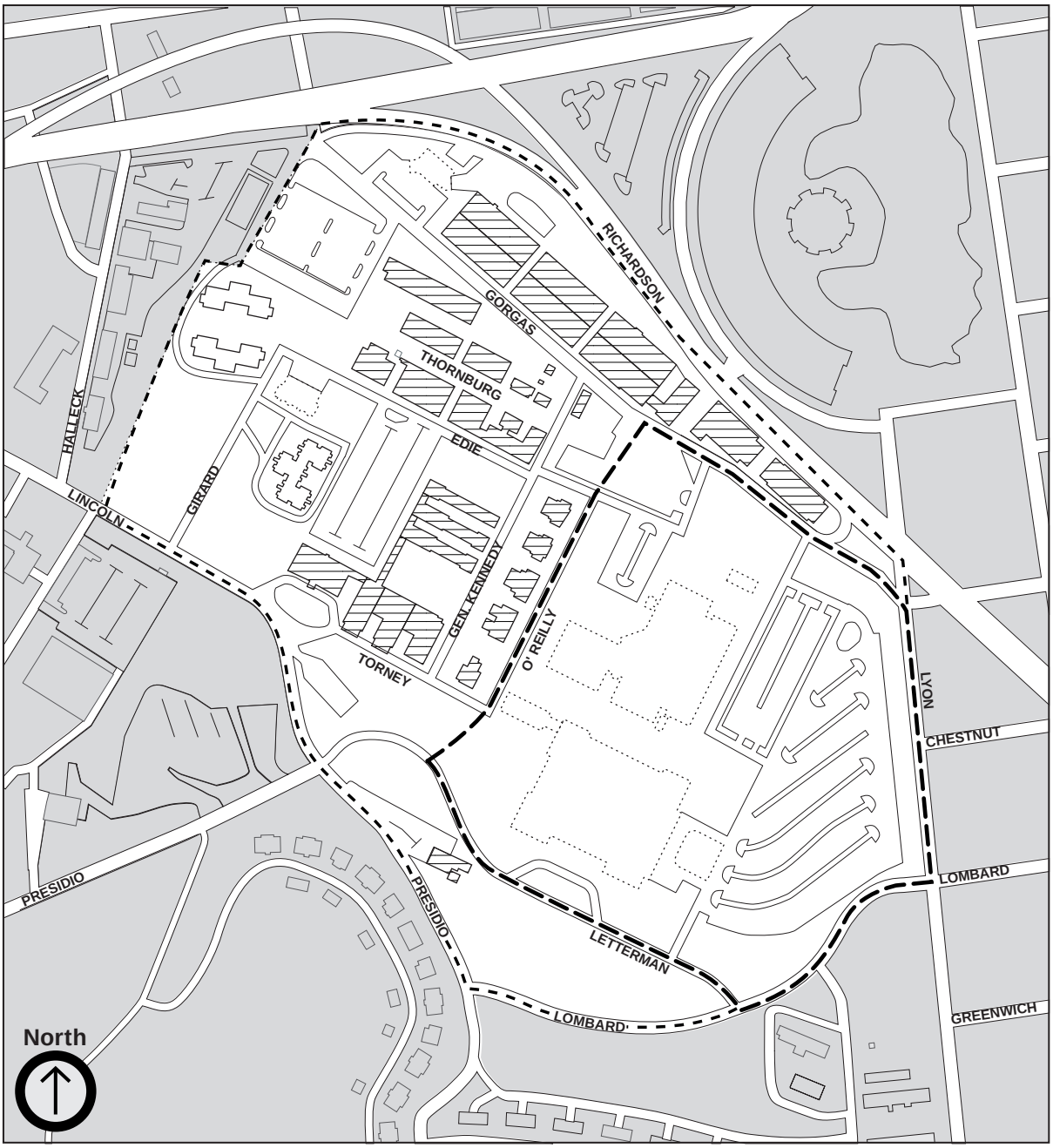


Figure 3.
Project Boundaries

60-Acre Letterman Complex

23-Acre Site

Historic building

Non-Historic Buildings which could be removed

Non-Historic Buildings which would remain

Note: See Table C-1 for Proposed Building Treatments

forecasted revenues, the Trust had to look to a site that under real-world marketing pressures could offer the essential combination of characteristics for success, and the 23-acre site offered this combination. It provided a history of intensive use, development flexibility, amenities that other Presidio sites could not as effectively provide, and marketing and development efficiencies.

First, the 23-acre site continued the historic density. The 900,000 square feet of development would continue the approximate density and development footprint of LAMC and LAIR during the Army's tenure, and would therefore not be a substantial departure from the density of development that had previously existed at the site for 30 years. Similarly, NPS had carried this approximate footprint through to its 1994 RFQ (NPS 1994c). The NPS RFQ assumed retention and reuse of 356,000 square feet at LAIR and allowed for new replacement construction predominantly, although not entirely, within the 23-acre site to replace LAMC (NPS 1994c). Had NPS concluded a lease with UCSF as proposed in the RFQ, it would have involved occupancy by a single large anchor tenant largely within the 23-acre site, an intensity of use roughly comparable to that of the Army.

In addition, the 23-acre site proposed for development continues an intensity of use at one of the only sites on the Presidio that historically has been subjected to intensive development because of its proximity to the urban area and amenities outside the Presidio boundary. Since the late 1890s, when the first Letterman Army Hospital was built, the 23 acres has been used intensively, first as a corridor to the adjacent city of San Francisco neighborhoods, later as a part of the Panama Pacific International Exposition, and finally as one of the busiest military hospitals in the country until the post World War II era when it became a regional medical center serving the military community in the region (see Section 1.1.6).[9] Therefore, the area within and immediately surrounding the 23-acre site has had a history of intensive use.

Second, retaining intensive development on these 23 acres is also appropriate to the qualities of this site both in its potential for new construction and in its absence of historic buildings. The GMPA severely limited the amount and location of new construction at other Presidio sites. The 23-acre site, being an already built-out area of the Presidio, is by far the largest among the limited number of sites identified in the GMPA for potential new construction. And, unlike the remainder of the 60-acre complex, the 23-acre site did not house historic buildings, which add complexity and higher project costs, bringing down the revenue generation potential. Thus, given the number of historic buildings elsewhere within the Letterman Complex and at other built-out areas of the Presidio, opportunities are limited for new construction on the Presidio of a scale needed to satisfy the FMP financial parameters for the Letterman Complex.

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

[9] About 1,500 civilian and military personnel were employed at the two facilities (NPS 1994b), and in 1990 alone as the Army was downsizing its operations, LAMC admitted 6,890 patients and provided outpatient care to over 225,000 military retirees, their dependents, or survivors. (U.S. Army Corps of Engineers 1991).

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

In sum, the GMPA together with the financial forecasts of the FMP set forth a rational means to begin to implement the newly enacted Trust Act self-sufficiency requirement. The purpose and need of proposing to develop a project at the Letterman Complex under the parameters set out in the Trust's Letterman RFQ is to generate assured income in the amount and on the timetable forecast within the FMP.

1.3 Goals

The Presidio Trust has set the following goals for the project. The proposed project must meet these goals to the fullest extent possible.

1.3.1 CONSISTENCY WITH PRESIDIO GOALS AND APPROVED PLANS AND POLICIES

The Presidio Trust seeks to approve a project that is consistent with the Presidio Trust's mandate, as provided by the Presidio Trust Act (Appendix H), and is generally consistent with the more site-specific proposals and planning principles of the GMPA.

1.3.2 REVENUE GENERATION

A key goal of the project is revenue generation. Under the Trust Act Section 104(o), the project must be consistent with the self-sufficiency mandate of the Presidio Trust Act, which requires the Trust to manage the Presidio to become financially self-sufficient by year 2013. The Trust demonstrated the means to achieve self-sufficiency in the Financial Management Program submitted to Congress in 1998 in response to the Trust Act requirement of Section 105(b).

Other requirements of the Trust Act also bear upon the revenue generation goal. The cost and terms of the ground lease must reflect reasonable competition in the San Francisco area (Trust Act section 104(b)). Also, the Trust must give priority to tenants that enhance the financial viability of the Presidio and consider the extent to which prospective tenants contribute to the reduction in cost to the federal government (Trust Act section 104(n)). Further, terms and conditions for a ground lease must include an annual service district charge to recover the Trust's costs of providing police, fire, emergency medical service, infrastructure maintenance, and other services to Presidio tenant organizations (Trust Act Section 102(a)).

1.3.3 TIMELY DEVELOPMENT AND FULL OCCUPANCY

The GMPA and later the FMP established the Letterman Complex as the priority project for implementation at the Presidio (see Sections 1.1.7 and 1.2.2). Therefore, the Trust has set as a project goal the timely development and achievement of full occupancy. Users or tenants must demonstrate an ability to finance the project, including the demolition of the medical center and research institute. Further, the Presidio Trust will give preference to users or tenants offering completion of all phases within a limited timeframe.

1.3.4 ENHANCEMENTS FOR ACHIEVING PRESIDIO GOALS

Although the General Objectives of the GMPA are the Trust's required guideposts, as a matter of policy the Trust uses the GMPA as the foundation for its planning decisions. Therefore, the Trust has adopted as a project goal various goals of the GMPA.[10] Users or tenants will need to explore ways to further the goals of the Presidio, including but not limited to the following:

- *Social Programs* – Users or tenants are encouraged to help fund social programs that directly promote the fundamental principles of the Presidio's mission, such as stewardship and sustainability, cross-cultural and international cooperation, community service, and health and scientific discovery.
- *Environmental Programs* – Users or tenants are encouraged to help fund environmental programs or participate with organizations working to resolve some of today's major environmental issues, such as sustainable design, global climate change, environmental cleanup, resource protection, and biological diversity.
- *Shared Space* – Users or tenants are encouraged to share workspace with organizations focusing on social, cultural or environmental issues.
- *Public Outreach and Input* – Users or tenants are encouraged to sponsor programs or symposia, performances, lecture series, complementary research activities and special exhibitions. Programs should be widely accessible to the public and be committed to diversity of age, ethnicity, gender, culture, and physical ability.

1.3.5 DESIRED USERS OR TENANTS

The GMPA identifies potential users or tenants for the Presidio as those involved in education, arts, scientific research, environmental studies, scientific inquiry, healthcare, philanthropy, conflict resolution, and international relations. The Presidio Trust Act, which establishes additional tenant selection criteria, requires consideration not only of the extent to which prospective tenants contribute to the implementation of the GMPA, but also to the reduction in cost to the federal government and the financial viability of the Presidio. To address the additional Trust Act criteria, additional market analysis of potential user or tenant groups after enactment of the Trust Act identified additional potential categories of prospective tenants (Mancini-Mills 1998a). They might also include those involved in the following sectors: biotechnology, multimedia, computer graphics, telecommunications, film production, Internet-based research and development, computer software, environmental science and other high-technology, knowledge-based industries. Regardless of the programmatic focus of a prospective user or tenant, each will need to explore ways to further the goals of the Presidio.

[10] The Trust's 1998 RFQ for the Letterman project presented these goals as the "general objectives" of the GMPA. This summary does not, however, set out the General Objectives of the GMPA (see Section 1.1.5, above), but instead certain literal statements from the GMPA. The confusion in terminology can be explained by the fact that the RFQ was drafted at a time when the Trust was a skeleton organization with only a small number of employees and had not yet considered the meaning of the term as used in the Trust Act.

1.3.6 HISTORIC COMPLIANCE

New construction must comply with the regulations that govern application of the NHPA. A Programmatic Agreement between the Trust, the SHPO, ACHP, and NPS would be executed to set forth a consultation process to fulfill the Trust's obligations under the NHPA. As part of this process, Planning Guidelines and Design Guidelines for new construction would be adopted and utilized to ensure the compatibility of new construction with the National Historic Landmark setting. By removing the medical center and research institute buildings and replacing them with buildings more architecturally compatible with the historic landmark setting, the Trust seeks to achieve the General Objective of "preserv[ing] and enhanc[ing] the historical, cultural, natural, recreational, and scenic resources of the Presidio."

1.3.7 ARCHITECTURALLY SENSITIVE DESIGNS

Pursuant to the requirements of the NHPA, new construction will be designed and sited to be architecturally compatible with the Presidio's National Historic Landmark setting through elements of massing, scale, material, style and color. New construction will be subject to Planning and Design Guidelines (Planning Guidelines are provided in Appendix B) and design review, including consultation pursuant to a Programmatic Agreement (provided in Appendix F) with the SHPO, the ACHP, and the NPS. All new buildings, additions, and landscape features will be designed and sited to harmonize with their historic settings.

1.3.8 TRANSPORTATION DEMAND MANAGEMENT

Users or tenants will participate in a transportation demand management program for the Presidio. Lease agreements will outline the actions to be taken to encourage alternatives to automobile use by employees and visitors and to reduce the number of vehicles coming to the site and demand for parking.

1.3.9 ENVIRONMENTAL SUSTAINABILITY

Both the General Objectives of the GMPA and the GMPA itself set sustainability as a goal for the Presidio. Therefore, consistent with the Planning and Design guidelines for the Letterman Complex, users and/or tenants will be required to use environmentally responsible and sustainable design in new construction. Energy-efficient material and building techniques will be employed, and facilities will be maintained to ensure their sustainability.

1.4 Relationship of Planning and Design Guidelines to the Letterman Project

In addition to the Trust's compliance with the NEPA process, which is the purpose of this EIS, compliance with the NHPA is of central importance to any project within the Presidio boundary that may have an effect on the National Historic Landmark district. Concurrent with actions to satisfy the NEPA process, the Trust has been engaged in activities designed to meet the requirements of the NHPA for the proposed project.

1.4.1 THE NHPA MANDATE

Section 110 of the NHPA sets out the broad historic preservation responsibilities of federal agencies to ensure that historic preservation is fully integrated into ongoing programs. Under Section 110(f), special protection is to be afforded to National Historic Landmarks. Under that provision, a federal agency must, "to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm" to a National Historic Landmark that may be directly and adversely affected by an undertaking such as the proposed project.

Section 106 of the NHPA requires federal agencies to take into account the effects of their actions on historic properties and seek comments on their actions from an independent reviewing agency, the ACHP. The revised regulations of the ACHP (Title 36 of the Code of Federal Regulations at Part 800) provide the methodology for assessing impacts on historic resources and detail the requirements of the consultation process. When a project is complex and is expected to continue over time, the regulations allow development of a Programmatic Agreement that governs ongoing and future activities undertaken as part of the project or program it addresses. Once a Programmatic Agreement is finalized, implementation of the Programmatic Agreement satisfies the agency's obligations under Sections 106 and 110(f) of the NHPA. Pursuant to these regulations, the Trust has been engaged in consultation with the ACHP and the SHPO with regard to Section 106 compliance at the entire 60-acre Letterman Complex.

1.4.2 EARLY ACTIONS OF TRUST TO COMPLY WITH THE NHPA

The Trust initiated NHPA compliance early in the Letterman project planning process, even before the Trust sought proposals on the proposed project and concurrent with the earliest stages of the NEPA process. In an August 1998 letter to the SHPO, the Trust initiated the Section 106 consultation process by proposing to the SHPO to develop criteria and guidelines for the Letterman Complex (e.g., cluster patterns, orientation, circulation, spatial organization, and landscaping) and buildings (e.g., massing, scale, height, roof forms, colors, materials) to ensure that any new construction at the site would be compatible with the character of the historic district. In October 1998, the SHPO responded, requesting that the Trust provide criteria and guidelines for SHPO and ACHP review and proposing development of a programmatic agreement governing the Letterman Complex.

Preparation of guidelines began in January 1999, with assistance from NPS technical staff. The Trust presented the public with a draft outline of the guidelines at a public scoping session on January 27, 1999. As the Trust continued development of the guidelines, it provided draft versions of the guidelines and periodic updates to the development teams prior to their final submittals.

At the same time, the EIS process was underway, and the Draft EIS identified the need for guidelines to be developed to ensure that potential new construction at the 23-acre site would not have an adverse effect on the National Historic Landmark district. It was at this point that the early form of the guidelines came to be referred to as Planning Guidelines (as distinguished from Design Guidelines). The Trust created this distinction because the scale of detail available at this point in the planning process, where only conceptual site plans would be available and shown as part of the EIS, was appropriate to the planning level of design and not the architectural detail level. More detailed architectural design guidelines would necessarily have to be developed later in the design process after the EIS and final project alternative selection was complete.

1.4.3 COORDINATION OF LETTERMAN NHPA AND NEPA COMPLIANCE PROCESS

Guidelines are a tool used to ensure that new construction within a National Historic Landmark conforms to the historic setting. The Planning Guidelines (Appendix B) also apply to undertakings that fall short of new construction as could be the case in the area outside the 23-acre site proposed for new construction and analyzed in this EIS.

Although design guidelines are a tool for ensuring compliance with the policies of the NHPA, neither the NHPA nor NEPA requires that they be made a part of the environmental analysis under NEPA. For other projects based upon the 1994 Presidio GMPA involving new construction at the Presidio (i.e., golf course clubhouse and fire station), NPS had prepared design guidelines internally that were not made available for public review or comment during their development and that were not made part of the NEPA analysis for those projects. As a result of these projects, however, the Trust became more aware of the keen public interest in having opportunities for public input into guideline development and the design review process. Therefore, although not required as part of the analysis under NEPA, the Trust elected to publish the planning level guidelines as part of the Letterman EIS so that the public would have a significant opportunity early in the development of the guidelines to provide comment and input prior to their final adoption.

The purpose and intent of the conceptual Planning Guidelines is to ensure that any Letterman Complex undertaking by the Trust is in keeping with the character of the Presidio's National Historic Landmark district and to provide a design framework for all future actions in the 60-acre Letterman Complex. The Final Planning Guidelines in Appendix B provide measures to guide the continuing project implementation within the Letterman Complex so that projects there would be compatible with the scale, architectural character, and pedestrian-friendly quality of the existing historic setting. Diligent attention to the Final Planning Guidelines will promote a sensitive integration of the new construction on the 23-acre site into the Letterman Complex's historic setting.

In addition to soliciting public input on the guidelines under the NEPA process through their publication in the Draft EIS (Appendix B), the Trust continued to act to meet the NHPA consultation requirements. In June 1999, the Trust invited 39 interested preservation, design, archeology, and Native American organizations to a work session to receive further public input from organizations with special expertise in historic and cultural preservation. The Trust sought input from these parties on the effect of the proposed project on cultural resource issues at the Presidio. The SHPO and representatives from the ACHP and NPS attended the session, which served as a formal consultation meeting under Section 106 of the NHPA.

In keeping with the SHPO's October 1998 letter concerning NHPA compliance, the Trust, the ACHP, the SHPO, and NPS have finalized and executed a Programmatic Agreement governing the Letterman Complex (Appendix F). The Programmatic Agreement sets forth the NHPA Section 106 review and consultation process. Its provisions provide for sustained involvement from the SHPO, ACHP, and NPS throughout the process of developing Design Guidelines, conceptual design documents, and schematic design documents and into the construction phase. In addition, the Programmatic Agreement includes opportunity for public input at both the guideline development stage and the conceptual design phase for new construction.

The Final Planning Guidelines in Appendix B, which have been publicly reviewed and finalized as part of this EIS, will be incorporated into the Design Guidelines, which are now under development and must be submitted to the SHPO for review and comment as part of the Section 106 consultation process. The Final Planning Guidelines will therefore be applied and continue to provide direction through the consultation and design review process under the Programmatic Agreement, where review of their application by the ACHP, SHPO, NPS, and public will continue after the environmental review process for this action is concluded. Where a project, as here, is in the early conceptual stages, the guidelines should not be viewed as rigid rules. They have

been prepared as a continuing interactive set of "guides" to help shape future actions as built and will serve as guides as the project moves through the process of negotiation, the signing of a lease, or the execution of a development agreement. The Trust's intent is to ensure that the project design and construction conforms as closely as practicable to the Planning and Design Guidelines, recognizing all the while that the guidelines themselves identify priorities and goals that may in their application be at odds with one another, necessitating tradeoffs among them. To the extent that the project design and construction is not now or may not in the future be consistent with each specific of the Planning and Design Guidelines, these departures have been identified and discussed as potential adverse effects in Section 4 of the EIS.

1.5 Impacts to be Analyzed

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

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

Consistent with a tiered analysis, the Environmental Screening Form (ESF) in Appendix A is a tiering analysis that summarizes 36 impact topics discussed in the GMPA EIS. For each impact topic, the ESF identifies specific discussions that are still relevant to the alternatives, summarizes the issues discussed in the earlier GMPA EIS, and incorporates discussions from the document by reference. The ESF also identifies those discussions that no longer apply under the changed circumstances and identifies issues specific to the project that require environmental analysis additional to what has already been prepared as part of the GMPA EIS.[11] Based on the results of the ESF and consultation and coordination efforts (as discussed in Section 5), the Presidio Trust has determined that the significant issues listed below require additional analysis in this document.

1.5.1 CONSISTENCY WITH PRESIDIO GOALS AND APPROVED PLANS AND POLICIES

As required by NEPA, the relationship of the project to approved land use plans for the area surrounding the Letterman Complex is discussed in this document. Formally adopted documents for land use planning that bear

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

on the project include the Presidio GMPA and the General Plan of the City and County of San Francisco (which only governs and applies for the area outside of the Presidio property).

The Presidio Trust Act requires that the Presidio Trust manage the property under its administrative jurisdiction in accordance with the Presidio Trust's mandate, including the purposes of the Act establishing the Golden Gate National Recreation Area and the General Objectives of the GMPA, which are identified in Section 1.1.5 of this document. This document evaluates whether the alternatives are consistent with these General Objectives and with the GGNRA Act purposes. In addition, it discusses the relationship between each of the alternatives and more specific proposals and planning principles stated in the GMPA.

1.5.2 SOLID WASTE

Demolition of the research institute was not previously considered in the GMPA EIS. The additional solid waste generated during demolition may have an impact on solid waste disposal facilities.

1.5.3 WATER SUPPLY AND DISTRIBUTION

The recent completion of renovations and upgrades at the Presidio water treatment plant has made it possible to resume diversions of Lobos Creek for the Presidio's water supply. Diversions from this water resource are limited by natural flow capacities and by specific goals in the Presidio GMPA. The new water demand associated with the alternatives may have an impact on the Presidio's water system and Lobos Creek streamflows.

1.5.4 SCHOOLS

The GMPA EIS assumed that no new housing units would be constructed at the Letterman Complex. Because new housing is currently being considered under several of the alternatives, the number of school children from the Presidio enrolled in public schools may be greater than previously analyzed, which may impact local school facilities.

1.5.5 HOUSING

The GMPA EIS did not anticipate the proposed housing that is currently being considered under several of the alternatives to support activities and programs at the complex. In addition, since preparation of the GMPA EIS, several policies and programs have been established that could impact housing availability, including short-term leasing.

1.5.6 HEALTHCARE AND MEDICAL RESEARCH

The GMPA EIS evaluated the impacts of leasing LAIR to a tenant or tenants for use as a research facility. If this use is precluded, development of space within the Letterman Complex for other than medical research programs may have an adverse effect on medical, life science and/or earth science knowledge and discovery in the Bay Area if no other such space is available nearby.

1.5.7 TRAFFIC AND TRANSPORTATION SYSTEMS

Since preparation of the GMPA EIS, new circumstances or information relevant to traffic conditions, building and land uses, and potential intersection and roadway improvements may bear on the project and its impacts. Also, changes in transportation demand management actions from those previously considered may affect parking and automobile use.

1.5.8 CULTURAL RESOURCES

If the medical center and research institute are demolished and replaced with new construction, these buildings could have an adverse effect on the historic setting. New construction would need to be sited and designed to be in keeping with the character of the historic setting and in accordance with guidelines prepared by the Presidio Trust.

1.5.9 VISUAL RESOURCES

The GMPA EIS recommended additional analysis for major replacement construction, including design guidelines and building height restrictions to help minimize adverse impacts on scenic viewing.

1.5.10 AIR QUALITY

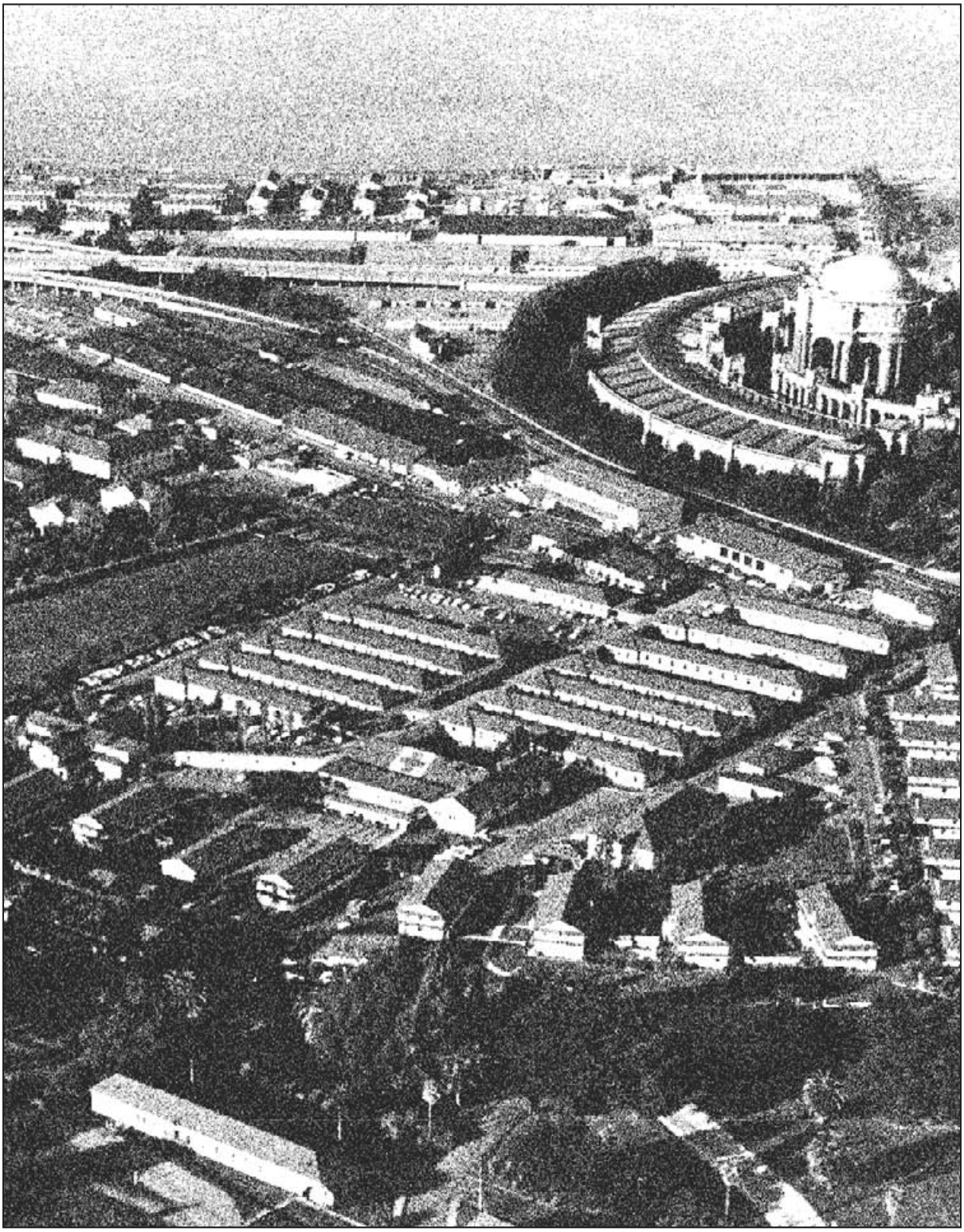
Although no alternative currently under consideration for the Letterman Complex is expected to produce numbers of vehicle trips to the Presidio greater than those previously analyzed in the GMPA EIS, since the time of preparation of that document, the significance thresholds for regional emissions published by the Bay Area Air Quality Management District have been reduced. Therefore, additional analysis is required to re-evaluate regional air quality impacts.

1.5.11 NOISE

Noise levels presented in the GMPA EIS would require updating based on new noise measurements, recent traffic counts, and potential traffic volume increases. In addition, the analysis of construction noise in the GMPA EIS did not include demolition of the LAIR building, which is now being contemplated under several of the alternatives. Therefore, the characteristics and duration of noise for demolition/construction activities at the site, and the effectiveness of the mitigation measures within the GMPA EIS would need to be re-evaluated as necessary.

1.5.12 CUMULATIVE IMPACTS

The environmental analysis in the GMPA EIS included the cumulative effects of site development on the environment. Further analysis is required only for the following impact topics for which the incremental contribution of proposed development to cumulative effects addressed in the GMPA EIS may be significant: solid waste, water supply and distribution, schools, housing, traffic and transportation systems, cultural resources (including visual resources), air quality, and noise.



The financial forecasts of the FMP required by Congress built on the Army's use of and the NPS's projections for the Letterman Complex (as reflected in the GMPA and the NPS Letterman RFQ) (see Section 1.2.2). These forecasts further delineated the necessary financial parameters of the proposed project and helped to shape the eventual range of alternatives now under consideration. This section describes the range of alternatives that are presently being considered for new development and uses on a 23-acre site within the Letterman Complex, and describes how these alternatives have been developed. Since the Letterman Complex planning process began more than ten years ago, many other alternatives have been proposed but are not included here. This section, therefore, also briefly reviews and discusses some of these other alternatives that have been considered but rejected as part of the analysis under this EIS.

For the purposes of this analysis, six alternatives have been formulated for new development within the Letterman Complex, and are considered in comparable detail:

- Alternative 1: Science and Education Center (Updated Presidio GMPA Alternative)
- Alternative 2: Sustainable Urban Village
- Alternative 3: Mixed-Use Development
- Alternative 4: Live/Work Village
- Alternative 5: Digital Arts Center (Preferred Alternative)
- Alternative 6: Minimum Management (No Action)

2.1 Development of Alternatives

A summary of the six alternatives is provided in Table 1. Alternative 6, Minimum Management, has been included in the analysis to evaluate the impacts of a "no action" alternative as required by NEPA. Similarly, the Trust has included Alternative 1, the Science and Education Center, to provide a useful baseline study of the impacts of implementing the GMPA alternative, as updated by current circumstances. Alternatives 2, 3, 4, and 5 present a range of real-world alternatives based upon proposals submitted in response to a 1998 *Request for Qualifications* (Presidio Trust 1998a).

In response to the unique financial, planning, and tenant selection mandates of the Trust Act (see Section 1.2.1), of key importance to the Trust's process was to identify alternatives based upon proposals that the marketplace could actually offer. Building the process of alternative identification around this criterion was intended to avoid the result of having studied and selected a prospective use for a particular site for which no tenant could ultimately be found, as was the case when UCSF and others failed to lease the Letterman facilities following the GMPA EIS (see Sections 1.1.7 and 1.2.2). Therefore, the Trust, through an RFQ and later Request for Proposals (RFP) for the Letterman Complex, solicited market-based proposals seeking submitters capable of ground leasing and developing 900,000 square feet of new construction on a 23-acre site within the Letterman Complex (Presidio Trust 1998a and 1998k). A project of 900,000 square feet was necessary to achieve the financial expectations of the FMP, and the 23-acre site approximated the density that already existed and was proposed as a possibility by NPS's Letterman RFQ under the GMPA at this developed site (see Section 1.2.2).

Table 1
Summary of Alternatives

ALTERNATIVE	ALTERNATIVE 1: SCIENCE AND EDUCATION CENTER (UPDATED PRESIDIO GMPA ALTERNATIVE)	ALTERNATIVE 2: SUSTAINABLE URBAN VILLAGE	ALTERNATIVE 3: MIXED-USE DEVELOPMENT	ALTERNATIVE 4: LIVE/WORK VILLAGE	ALTERNATIVE 5: DIGITAL ARTS CENTER	ALTERNATIVE 6: MINIMUM MANAGEMENT (NO ACTION)
Concept	60-acre Letterman Complex used as a center for research and learning with programs and uses in: • Research • Education • Office	23-acre site within Letterman Complex used for a sustainable, live-work village around a public commons. Uses include: • Health Care • Education • Office • Housing • Inn/Retreat • Urban Agriculture and Aquaculture	23-acre site within Letterman Complex used for a mixed-use complex centered around a village commons. Uses include: • Office • Conferencing/Lodge • Education • Assisted Senior Living	23-acre site within Letterman Complex used as a mixed-use village, with an anchor tenant and smaller organizations, around a public green. Uses include: • Office • Institution/Education • Housing • Support Services	23-acre site within Letterman Complex used as a single institutional campus for research, development and production of digital arts and technology, surrounding a public park. Uses include: • Office • Archive related to the digital arts • Education • Support Services	60-acre Letterman Complex used as a limited center for scientific research and education. Uses include: • Office • Research

Table 1
Summary of Alternatives

ALTERNATIVE	ALTERNATIVE 1: SCIENCE AND EDUCATION CENTER (UPDATED PRESIDIO GMPA ALTERNATIVE)	ALTERNATIVE 2: SUSTAINABLE URBAN VILLAGE	ALTERNATIVE 3: MIXED-USE DEVELOPMENT	ALTERNATIVE 4: LIVE/WORK VILLAGE	ALTERNATIVE 5: DIGITAL ARTS CENTER	ALTERNATIVE 6: MINIMUM MANAGEMENT (NO ACTION)
Building Removal/Site Improvements	Reuse of LAIR; possible demolition of LAMC to restore open space. Up to 503,000 sf of infill construction within 60-acre Letterman Complex. Office/Research = 503,000 sf	Demolition of LAMC and LAIR, with reuse of basements for parking. 900,000 sf of replacement construction within 23-acre site. Inn/Retreat = 180,000 sf Education/Institution = 233,000 sf Office = 187,000 sf Residential = 300,000 sf (300 to 400 units; 870 residents) Water feature for urban agriculture/aquaculture and gardens.	Demolition of LAMC and LAIR. Possible reuse of basements. 900,000 sf of replacement construction within 23-acre site. Conferencing/Lodge = 315,000 sf Senior Residential = 100,000 sf (135 residents) Education = 120,000 sf Office = 365,000 sf Waterway	Demolition of LAMC and LAIR. 900,000 sf of replacement construction within 23-acre site. Office/Institution = 530,000 sf Residential = 370,000 sf (400 to 450 units; 500 to 670 residents)	Demolition of LAMC and LAIR; partial reuse of basements. 900,000 sf of replacement construction within 23-acre site. Office = 840,000 sf Archive = 10,000 sf Support Services = 50,000 sf Lagoon	LAMC would be “mothballed.” LAIR would be permitted/leased (503,000 sf).

Table 1
Summary of Alternatives

ALTERNATIVE	ALTERNATIVE 1: SCIENCE AND EDUCATION CENTER (UPDATED PRESIDIO GMPA ALTERNATIVE)	ALTERNATIVE 2: SUSTAINABLE URBAN VILLAGE	ALTERNATIVE 3: MIXED-USE DEVELOPMENT	ALTERNATIVE 4: LIVE/WORK VILLAGE	ALTERNATIVE 5: DIGITAL ARTS CENTER	ALTERNATIVE 6: MINIMUM MANAGEMENT (NO ACTION)
Activities and Programs	Scientific research and education focusing on human health, preventive medicine, and nutrition; Health concerns related to the environment; Single research/ educational institute, or multi-tenant facilities.	A culinary institute with two restaurants; An institute on aging, elder health research and day care; An institute and museum for eastern medicine; Inn/retreat for visitors; For-profit high-technology businesses; Other businesses/non-profit organizations; Visitor information center; Demonstration gardens, greenhouses, marketplace for produce.	Lodge and conference center; Assisted senior living services with educational and care programs; Culinary institute; restaurants open to the public; For-profit/non-profit organizations and businesses.	Anchor tenant devoted to Internet media, communications and education/job training and skills development; Organizations focussed on themes of environmental conservation, national parks; Small-business incubator; Branch library for history and genealogy; open to the public; Historical society, museum and cultural center; Public pavilion with market hall.	A digital arts and entertainment company that would include: A visual effects and digital animation company; an interactive entertainment provider; an educational software provider; a movie screen and home-theater visual and sound technology provider; a developer of websites and content provider related to the parent company; a non-profit educational foundation; an institute offering a digital arts training program; and an archive related to the digital arts.	Same as Alternative 1

Table 1
Summary of Alternatives

ALTERNATIVE	ALTERNATIVE 1: SCIENCE AND EDUCATION CENTER (UPDATED PRESIDIO GMPA ALTERNATIVE)	ALTERNATIVE 2: SUSTAINABLE URBAN VILLAGE	ALTERNATIVE 3: MIXED-USE DEVELOPMENT	ALTERNATIVE 4: LIVE/WORK VILLAGE	ALTERNATIVE 5: DIGITAL ARTS CENTER	ALTERNATIVE 6: MINIMUM MANAGEMENT (NO ACTION)
Community and Support Services	970 Employees Housing for staff would be elsewhere in the Presidio. Small-scale food and visitor services.	1,500 Employees 250 Inn Guests 720 Students (400 would live on site) 870 Residents 300 to 400 housing units, to establish live-work community. Restaurants open to the public. Central commons for public programs and activities.	2,000 Employees 350-room lodge 135 senior residents Accommodations for 135 senior citizens would be “assisted living” with nursing facility. Culinary institute would contain restaurants open to the public. Lodge/conference center would provide job training, welfare-to-work program, and recruiting programs. Small-scale retail, food and other services to support employees and onsite community and visitors. Village commons as a community gathering place.	1,400 to 1,700 Employees 500 to 670 Residents Includes 400 to 450 housing units. Would include some loft-type units for live/work situations. Limited retail and support services for residents and employees. Meeting facilities for community use. Public green with open pavilion would serve as an activity center.	2,500 Employees Housing for staff would be elsewhere in the Presidio. Campus-like setting to include onsite food services, physical fitness and childcare services for staff. Café, coffee bar and restrooms open to public. 7-acre “Great Lawn” public park with lagoon.	690 to 700 Employees Housing for some staff would be elsewhere in the Presidio. No additional support facilities or concession services would be provided.

Table 1
Summary of Alternatives

ALTERNATIVE	ALTERNATIVE 1: SCIENCE AND EDUCATION CENTER (UPDATED PRESIDIO GMPA ALTERNATIVE)	ALTERNATIVE 2: SUSTAINABLE URBAN VILLAGE	ALTERNATIVE 3: MIXED-USE DEVELOPMENT	ALTERNATIVE 4: LIVE/WORK VILLAGE	ALTERNATIVE 5: DIGITAL ARTS CENTER	ALTERNATIVE 6: MINIMUM MANAGEMENT (NO ACTION)
Access, Circulation, and Parking	1,150 parking spaces. Parking would be in structured or surface parking lots. Lombard Street Gate would be primary entrance. Gorgas Avenue Gate would be reconfigured as secondary entrance. Transportation Demand Management (TDM) program implemented.	1,020 parking spaces: 750 underground and 270 surface spaces. Main vehicular entry from Gorgas Avenue; Letterman Drive redesigned with Torney Avenue extension for visitor entrance. Gorgas Avenue Gate entrance reconfigured; new access from Gorgas Avenue to Richardson Avenue provided. Pedestrian gate at Chestnut Street. TDM program implemented.	1,670 parking spaces: 1,320 underground and 350 spaces in surface lots. Main vehicular entry would be Gorgas Avenue with vehicular circulation along site's perimeter. Lodge entry would be from Letterman Drive. Gorgas Avenue Gate entrance reconfigured; new access from Gorgas Avenue to Richardson Avenue would be provided. Pedestrian gates at Chestnut and Francisco streets; pedestrian link from Lombard Street Gate to Torney Avenue. TDM program implemented.	1,390 parking spaces: 1,290 underground and 100 on-street spaces. Main vehicular entry would be from Gorgas Avenue. Perimeter and internal roads around site. Gorgas Avenue Gate entrance reconfigured; new access from Gorgas Avenue to Richardson Avenue would be provided. TDM program implemented.	1,530 parking spaces: 1,500 underground and 30 on-street spaces. Main vehicular entry to access garage would be from Gorgas Avenue. Letterman Drive serves as visitor entrance. Pedestrian gate at Chestnut. Gorgas Avenue Gate entrance reconfigured; new access from Gorgas Avenue to Richardson Avenue provided. TDM program implemented.	770 parking spaces in existing surface parking lots. Lombard Street Gate would be primary entrance, and Gorgas Avenue Gate would be secondary. No modifications to road or pedestrian circulation. TDM program implemented.

Table 1
Summary of Alternatives

ALTERNATIVE	ALTERNATIVE 1: SCIENCE AND EDUCATION CENTER (UPDATED PRESIDIO GMPA ALTERNATIVE)	ALTERNATIVE 2: SUSTAINABLE URBAN VILLAGE	ALTERNATIVE 3: MIXED-USE DEVELOPMENT	ALTERNATIVE 4: LIVE/WORK VILLAGE	ALTERNATIVE 5: DIGITAL ARTS CENTER	ALTERNATIVE 6: MINIMUM MANAGEMENT (NO ACTION)
Environmentally Sustainable Practices	Sustainable design principles used for new construction.	Sustainability theme throughout development. Sustainable design principles used for new construction. Recycle onsite gray water for irrigation. Onsite agriculture and aquaculture. Demonstration gardens/greenhouses with marketplace for produce.	Sustainable design principles used for new construction. Water feature used for stormwater management. Aggressive waste reduction and recycling program. Use of gray water onsite.	Sustainable design principles used for new construction. Use of gray water for irrigation.	Sustainable design principles used for new construction. Use of storm water from cistern and lagoon for irrigation.	Sustainable practices for administrative and facility management programs incorporated as possible.
Proposed Schedule	LAIR occupied by 1999.	Completion by 2002.	Residential construction completion by 2003.	Residential component completed by 2001; offices completed by 2003.	Completion by 2004.	Completion by 2004.

2.1.1 THE REQUEST FOR QUALIFICATIONS

The Presidio Trust designed its process for identifying alternatives to cast a wide net. Initially, the Trust sent its notice of the availability of the RFQ for Letterman to about 4,000 prospective users. The RFQ itself was sent to 2,400 organizations based on the response to the initial mailing and targeted user groups. Among the targeted user groups, the Trust included biotechnology and medical research institutions and companies. The Trust identified prospective tenants using Dun and Bradstreet national listings for tenants in specific industries and San Francisco Bay Area listings of the largest companies in specific industries. Industries targeted from the national database included Scientific Research and Development Services and pharmaceutical and medicine manufacturing. Locally, the largest employers in the following areas were contacted: biotechnology/biopharmaceutical companies, medical devices companies, and hospitals. Finally, the Presidio Trust made an extensive outreach to the real estate brokerage community in an effort to reach users actively seeking space. In sum, to ensure the fullest possible range of alternatives within the financial and planning parameters, the Trust advertised the RFQ locally and nationally through a direct mailing to a list of approximately 5,000 brokers, business and community organizations, and prospective tenants in a range of occupational categories, including medical research, science, technology, education, environmental science, and biotechnology.

The Trust received 18 responses to the RFQ. Ten responses were from master tenants (i.e., respondents who proposed to develop the full 23-acre site), and eight responses were from prospective subtenants (i.e., respondents who had smaller space needs, were only interested in being part of a larger project, or did not demonstrate the financial capability and/or development experience to develop the 23 acres). The Trust focused its evaluation on the master tenant/developer responses, with the understanding that prospective subtenants would be referred to master tenants for potential inclusion in more evolved proposals. The ten master tenant responses included various land use proposals: three all-office alternatives, one office/housing/retail/restaurant alternative, three office/housing alternatives, two office/housing/lodging alternatives, and one office/housing/public building alternative.

The evaluation criteria for the RFQ included financial capacity to perform, proposed development concept, and proposed public outreach contributions. Given the import of the Trust's financial mandate and the complexity of the project, the threshold focus of the RFQ evaluation was to identify respondents with the required experience and financial capacity to complete the project. Later, more detailed proposals from respondents who met threshold criteria would provide further information to assess the compatibility of the proposal with programmatic goals.

The RFQ evaluation included a review and recommendation of the ten master tenant responses by a real estate consulting firm, including financial and public sector reference checks. After consideration and discussion of this evaluation, three respondents were eliminated from further consideration at this stage because they had not demonstrated a competitive level of financial strength or development experience to complete the project (two office/housing alternatives and an all-office alternative). The Board of Directors' Real Estate Committee then invited the seven remaining respondents for an interview and further consideration.

Of the seven RFQ respondents invited to interview, one dropped out, two opted to submit a joint proposal, and one (an all-office alternative) was not invited to proceed based on their relative standing after the interview, leaving four qualified respondents. The four remaining respondents had experience developing high-quality projects and strong financial and organizational capacity. They proposed a range of projects that allowed the Trust to consider various combinations of office, research, education, housing, lodging, and institutional uses; and they identified potential tenants, programs, and activities, rather than proposing purely speculative projects.

2.1.2 THE REQUEST FOR PROPOSALS

In December 1998, the Trust invited the four remaining qualified respondents who had met the threshold selection criteria to submit more detailed proposals. The RFP identified detailed submittal requirements and the Trust's selection criteria: compatibility of tenants with the General Objectives of the GMPA; compatibility with Presidio goals; development concept, design, and timing; overall strength of development team; financial proposal; sustainable design and traffic management plan; and outreach plan.

On March 1, 1999, the Trust received detailed proposals from the four teams invited to respond to the RFP (proposals are available for public review in the Presidio Trust library). These proposals are the basis for Alternatives 2, 3, 4, and 5. Together, Alternatives 1 through 6 present a rational and realistic range of alternatives for analysis. The alternatives differ primarily as to their development concept (type of project); proposed activities, programs and occupants; community support services and housing opportunities; and parking, access and circulation demands. These differences are summarized below and set forth in detail in Table 1, Summary of Alternatives.

Alternatives 1 and 5 would use the 23-acre site for research purposes by a single tenant or a collaborative group of institutions, while Alternatives 2, 3, 4, and possibly 6 would offer an array of programs offered by a number of public and private organizations. Alternatives 2 and 3 would provide lodging and conference centers as a major focus of activities. Alternatives 2 and 4 would provide a substantial housing component for employees or to the general public. Alternatives 2, 3, and 4 would be designed as mixed-use villages with central open spaces in a traditional urban pattern, while Alternative 5 would feature a series of linked buildings set around an open park (Great Lawn) that reflect an earlier pattern of development at the complex. Alternatives 1 and 6 would retain the 356,000-square-foot LAIR which, under Alternatives 2 through 5, would be demolished. Alternative 1 would provide for infill construction throughout the 60-acre complex while Alternatives 2 through 5 would limit construction to a 23-acre site. Alternatives 1 and 6 would retain the existing 8-acre parking lot, which under Alternatives 2 through 5 would be removed and replaced primarily with underground parking.

For all alternatives, maximum allowable square footage for buildings within the entire 60-acre Letterman Complex would not exceed 1.3 million square feet. Demolition of buildings in the Letterman Complex outside of the 23-acre site would occur (per the GMPA); and rehabilitation of the balance of buildings in the 60-acre complex would occur as identified in the GMPA. No additional actions involving new construction within the Letterman Complex beyond those provided in Alternatives 1 through 6 are expected.

2.1.3 IDENTIFICATION OF A PREFERRED ALTERNATIVE

Under applicable regulations governing NEPA, a preferred alternative is always identified by the proponent agency at either the Draft EIS or Final EIS stage. In order to identify a preferred alternative for NEPA

purposes, the Presidio Trust Board of Directors considered not only the NEPA analysis of alternatives as presented in the Draft EIS, but also the RFP selection criteria, public input, and the results of interviews and correspondence with project proponents. All four market-based proposals, corresponding to Alternatives 2, 3, 4, and 5, demonstrated sufficient financial capability consistent with financial projections. Furthermore, the four proposals offer comparable commitments to sustainable design and transportation demand management, and all four site plans and architectural designs would be subject to application of planning and design guidelines, design review by the Trust, and review by historic preservation agencies to ensure compatibility with the national park and National Historic Landmark setting.

In addition to considering distinguishing characteristics based upon these criteria, to identify a preferred alternative, the Trust looked at other possible distinguishing factors: compatibility of tenants with the general objectives of the GMPA; compatibility with Presidio Trust goals; overall strength of the development team; financing capability; and the proponent's public outreach plan.

Based on a comparative analysis of these factors, the Trust identified the Digital Arts Center (Alternative 5) as the preferred alternative because it meets the project purpose and need and offers other strengths:

Compatibility of Proposed Programs with Presidio Goals and Approved Plans – The preferred alternative meets the Trust goals outlined in Section 1, Purpose and Need, including the General Objectives of the GMPA (see also Sections 4.5.1.1 and 4.5.1.2). Furthermore, it offers innovative development of technology for entertainment, business, and education, and commitment to building and strengthening the Presidio as a park. Consistent with the General Objectives of the GMPA, Alternative 5 would provide a focus on learning and education, high-tech innovation, arts education, scientific discovery, creative arts, and public outreach. As envisioned in the specific recommendations of the GMPA, the 23-acre site would have a single user concentrating on research, education, and 21st-century uses. A unique strength of the proposal is that the complete tenancy is known; the proposal is the only one of the four market-based proposals that has a single user and no speculative space with undefined uses or tenants.

Development Team Strength – The Digital Arts Center proponent has managed the development of a master-planned campus that demonstrates a commitment to high quality, sustainable, and sensitive design, and the proposal is the only one of the four market-based proposals with a user as developer. All the others have developer proponents who would lease space to others, creating the possibility of uncertain uses.

Financing Capability – While all four market-based alternatives are backed by financially capable proponents and would meet the threshold financial return projected in the FMP, the Digital Arts Center alternative is distinguished as the only plan which would be 100 percent pre-leased and financed internally.

Public Outreach – Alternative 5 includes an archive of visual effects open to historians and scholars that would enhance the Presidio community by bringing artists, technicians, crafts people, engineers, researchers and business people to the Presidio. It includes an Advanced Digital Training Institute that would offer advanced study in computer graphics. An internship program would provide educational opportunities to college students, and the Vision Quest Program would bring local school children to the site to learn about career opportunities. A public cafe and coffee bar would serve park visitors, and the 7-acre park (Great Lawn) would

become a public amenity by increasing the open-space component of the site. The proponent organizations offered to continue a tradition of community service, and provide a strong interpretive program using their own innovative technology and techniques to enhance the national park visitor experience.

2.2 Alternatives Considered but Rejected

Although the analysis in this EIS has been narrowed to review of six alternatives, a myriad of proposals have been previously considered and most rejected during the more than ten years since the planning process for the future of the Letterman Complex began. Begun in 1990, when it was clear that the Presidio would be transformed from a military post to a national park, the planning process involved extensive input from the public based on meetings, workshops and special events, and responses to written and oral comments during development of the GMPA and its Draft EIS. This process produced the 150-page Presidio GMPA, as well as a 394-page EIS on the Presidio GMPA. The General Objectives of the GMPA guide the discretion of the Presidio Trust. This process, combined with the Presidio Trust's RFQ, scoping process,[1] and RFP for the Letterman Complex, has culminated to date in this document. The result has been to focus the reasonable alternatives for the Letterman Complex to those considered in detail in Sections 2.3 through 2.8 of this document.

The following briefly summarizes the full range of alternatives that have been considered by the Presidio Trust or its predecessor, the NPS, but that have been rejected and are not being evaluated in detail in this document. Each of these alternatives was initially thought to be viable and/or was suggested by the public, but following either detailed analysis by the NPS in the Presidio GMPA EIS or initial review by the Presidio Trust, each was determined not to merit detailed analysis in this document. In general, none of the following alternatives sufficiently resolves the underlying purpose and need or fulfills the stated objectives to a significant degree (refer to Section 1, Purpose and Need). This section briefly explains the reasons for their elimination from detailed analysis in this document.

2.2.1 ALTERNATIVE SITES

Although alternative sites at the Presidio for new replacement construction for LAMC and LAIR have been proposed, locations other than the 23-acre site do not have the essential characteristics for success as stated in Section 1.2.2, Underlying Purpose and Need. First, the GMPA currently sets forth the long-range plan for areas of the Presidio other than the Letterman Complex. Looking to alternative sites could conflict with the GMPA's stated planning goals to concentrate developed areas of the Presidio in the north (including program, residential, community and commercial facilities) and to remove residential areas in the south and expand open space there. Second, the GMPA identified the Letterman Complex as an area where change could occur, specifically leaving open the possibility of significant replacement construction at the Letterman Complex if existing buildings and improvements do not meet essential program and management needs. It would, therefore, be inconsistent with

[1] On September 2, 1998, the Trust conducted a pre-submittal conference for prospective RFQ respondents at which the Trust outlined goals and objectives, including minimum annual ground rent, for leasing at the Letterman Complex. At public meetings on August 25 and September 3, 1998, the public provided input regarding appropriate uses at the Letterman Complex. At a later public meeting on January 27, 1999, the Trust presented and discussed proposed EIS alternatives and analysis topics.

the GMPA to look elsewhere on the Presidio to locate the scale of development and intensity of use generally contemplated for the Letterman Complex in the GMPA. Third, sites for new construction within the Presidio are limited to the previously developed areas of the park, including the Public Health Service Hospital, Fort Scott and other sites within the Letterman Complex. Because of the GMPA's limits on new construction, these other sites do not provide the development opportunity to build and occupy approximately 900,000 square feet of building space and therefore generate sufficient revenue to allow the Presidio Trust to achieve financial self-sufficiency by fiscal year 2013. In sum, other Presidio sites do not have the development flexibility, the history of intensive use, or the revenue-generating potential needed to contribute to the Presidio's self-sufficiency goal as required by the Trust Act and as planned in the FMP, and alternatives that would impede the satisfaction of this goal have not been considered to be reasonable or viable.

Proposals for a smaller-scale development at the 23-acre site have also been made and rejected. Under these proposals, developers would demolish both LAIR and LAMC and build new buildings at a total scale of less than the 900,000 square feet analyzed in this EIS. As provided in the FMP, the Letterman Complex must be managed to become the single largest revenue-generating source for the Presidio. Smaller-scale development alternatives were rejected, as they would not generate sufficient income to the Presidio Trust to achieve financial self-sufficiency (see Section 1.2). Because the costs of development are not proportional but instead are fixed for any amount of development, land rent decreases by more than a proportionate reduction in the scale of development. For this reason, a smaller-scale development on the 23-acre site would reduce the revenue-generating potential of the project and impede the project goal of providing sufficient revenue to achieve the self-sufficiency mandate as specified in the FMP. A smaller-scale project would not be able to overcome significant cost hurdles of demolition, site-work/infrastructure improvements, and high-quality development desired to enhance the park.

2.2.2 ALTERNATIVE USES

During the course of public workshops and the RFQ process for the Letterman Complex, many alternative uses were identified for the Letterman Complex. Alternative uses included affordable housing, a performing arts academy, a residential extended stay facility and a visitor center. Although many of these uses were seen as desirable, several of the prospective users did not have the financial capability or qualifications to meet revenue generation objectives or ensure development and full occupancy within a limited timeframe as specified in the FMP (see Section 1.2). A discussion of the evaluation criteria applied to eliminate respondents from consideration during the alternatives development process is set forth in Section 2.1. Copies of the proposals received by the Presidio Trust in response to the RFQ for the Letterman Complex are on file and available for review at the Presidio Trust library.

2.2.3 REMOVE LAMC AND LAIR BUILDINGS AND RESTORE TO NATURAL CONDITIONS

Restoration of the 23-acre site to its natural conditions was considered but rejected because it would not be responsive to the financial needs for the Presidio or contribute to implementation of the GMPA. Restoring the 23-acre site to its natural condition forecloses the possibility of building reuse or construction at a Presidio site that has historically been used for such purposes, and may therefore effectively preclude a project at the

Table 2
Summary of Presidio Trust RFQ Responses That are not Being Examined Further for the Letterman Complex

ALTERNATIVE USE	SIZE
Master Development Teams or Tenants	
Office campus	Office: 900,000 sf
Office and residential	Office/research and development: 500,000 sf Housing: 400,000 sf
Education, museum, theater, and research	900,000 sf
Office and multi-family housing	Total: 900,000 sf Office: 20 acres Residential: 3 acres
Office, multi-family residential, and supporting retail	Office: 400,000 sf Housing: 220-300 units Retail/restaurant: 100,000 sf
Subtenants	
Assisted living units	200 units/3 acres
Assisted living facility to include Alzheimer special care	135 units/95,000 sf
College classrooms, libraries, labs and offices	300,000 sf
Education, training, research and clinical care	60,000 sf
Education, training, research, wellness center	45,000-60,000 sf
80-bed skilled nursing facility	44,000 sf
Private, non-sectarian preschool and elementary school	25,000 sf
Educational/planning alliance/global think-tank	Not available

Presidio with similar revenue-generation potential (see Section 2.2.1). Therefore, this alternative would contribute little, if anything, to the Presidio's financial viability because buildings would be unavailable for reuse there.[2]

This alternative is also contrary to the Trust Act's self-sufficiency and other financial requirements. This alternative, unlike any being studied in this EIS, does not generate ongoing revenue to cover the additional costs of Trust operations. It, therefore, fails to implement the FMP required by Congress, and would seriously jeopardize the Presidio Trust's ability to become a self-sufficient operation by 2013. Key to eliminating the need for ongoing federal appropriations are revenues from tenant use of Presidio buildings, and this Letterman Complex project is planned as the single largest source of non-residential revenue (see Section 1.2). Restoration to natural conditions would preclude generation of revenue from the Letterman Complex while adding to the capital costs of the Presidio-wide project the costs of demolition and restoration and to the ongoing operating costs associated with maintaining the area. Under the alternatives analyzed, the reuse of the site would generate ongoing revenue without adding additional costs to the Presidio Trust's operations.

Restoration of the site to its natural conditions also fails to implement the GMPA or the Trust Act. The GMPA calls for perpetuating the Letterman Complex as part of a building and activity core. This alternative would conflict with the GMPA's stated planning goals to concentrate developed areas of the Presidio in the north (including program, residential, community and commercial facilities) and to remove residential areas in the south and expand open space there. It may also conflict with the Presidio Trust Act's provision on new construction in Section 104(c)(3) by foreclosing the future use of the 23-acre site as a building and activity center.

In addition, implementation of this alternative would result in a marginally successful project from a natural values standpoint, since an island of open space and natural habitats would be created in an intensively used area. Wildlife values would be limited due to the site's isolation from other native plant communities, ease of access, and difficulties in controlling foot traffic. Thus, it may be more prudent to undertake restoration projects identified as appropriate in the GMPA and having a higher likelihood of success, including Inspiration Point, the Tennessee Hollow drainage, Mountain Lake and Lobos Creek.

2.2.4 GENERAL SERVICES ADMINISTRATION MANAGEMENT

The GMPA EIS considered this alternative as part of Alternative B (Public Sector Enclave). Under this alternative, uses of the Letterman Complex would be determined by the General Services Administration and would not necessarily be related to the park's purpose. Instead, the buildings in the Letterman Complex would most likely be occupied by federal government agencies. LAMC and LAIR might be used as a hospital or research complex. Historic buildings would be rehabilitated to support new uses. No site improvements would be made, but limited new development would be allowed if compatible with the historic setting and structures.

[2] It should be noted that Alternative 1, which allows for removal of the LAMC to enhance open space, partially satisfies the objectives of this alternative and has been analyzed under this EIS.

The NPS rejected this alternative, and it continues to be inappropriate today in light of the provisions of the Presidio Trust Act, such as the requirement of financial self-sufficiency and tenant selection criteria giving emphasis to those that enhance the financial viability of the Presidio. No government entities responded to the RFQ. This alternative does not allow revenue from tenants at the 23-acre site to support the Presidio; instead, monies would be deposited to the Federal Treasury for general use. Further, given the forecasts set forth in the FMP, government tenants are unlikely to have the financial capability to satisfy the financial parameters of the FMP for the 23-acre site.

2.2.5 BOUNDARY REVISION

The GMPA EIS considered this alternative as part of Alternative C (Expanded Open Space/Restoration/ Interpretation—Traditional Management). It would deauthorize LAMC and LAIR and exclude them from the Presidio's boundary, presumably relinquishing federal jurisdiction over them and selling them to private interests in accordance with the Federal Surplus Property Act.

This alternative was rejected by the NPS, and it continues to be inappropriate today in light of the preservation and enhancement purposes of the Presidio Trust Act and the fact that uses of the Letterman Complex once revised out of the Presidio boundary could be inconsistent with the General Objectives of the GMPA. This alternative would also not contribute to implementation of the GMPA. The GMPA calls for perpetuating the LAMC/LAIR site as part of a building and activity core; revising the site out of the Presidio boundary is therefore inconsistent with the GMPA. In addition, excluding the Letterman Complex from the Presidio does not implement the financial provisions of the Trust Act or the FMP. Because there could be no possibility of new construction and no revenue-generating capacity from a site or buildings defined out of the Presidio's bounds, removing the LAMC/LAIR site from the Presidio boundaries would not enhance the financial viability of the Presidio or contribute to its financial self-sufficiency.

2.2.6 PARTIAL MILITARY REUSE

The GMPA EIS considered this alternative as its Alternative D (Partial Military Reuse – Public/Private Partnerships). Under this alternative, LAMC would be used for acute health care for military staff, dependents, and retirees, while LAIR would be used to support military research. The Department of Defense would also use the historic buildings in the complex.

This alternative was rejected by the NPS. It continues to be inappropriate and unreasonable today in light of changed circumstances and the current lack of demand for use of these facilities by the military, as evidenced by the military's departure from the Presidio in 1994. The Base Closure and Realignment Act of 1989 required that the Presidio's use as a military installation be terminated and that the Presidio's military functions and personnel be transferred to other military bases. Since then, with the exception of some housing temporarily permitted to the Department of Defense, the military has entirely left the Presidio. This alternative would also be likely to conflict with purposes of the Presidio Trust Act and the requirement that the Presidio Trust become financially self-sufficient by 2013.

2.3 Alternative 1: Science and Education Center (Updated Presidio GMPA Alternative)

2.3.1 CONCEPT

Under this alternative (Figure 4), the 60-acre Letterman Complex would continue to be used to nurture ideas and support research and actions to improve human and environmental health. Life and earth science programs would be explored to better understand and manage the interdependence of health and the environment. Through programs encouraging public participation, as well as lectures, displays and interactive exhibits, visitors would learn about the scientific research that is underway and its contribution to society.

2.3.2 BUILDING REMOVAL/SITE IMPROVEMENTS

The LAIR would be rehabilitated and leased for reuse as a research/office facility. The LAMC could be rehabilitated or partly or entirely removed. The LAMC auditorium would be retained for use as a public space. Up to 503,000 gross square feet of replacement construction could substitute for LAMC and other buildings identified for demolition. New construction would occur if existing buildings and improvements could not meet essential program and management needs.

For this alternative, replacement construction could take place inside the 23-acre site. Infill construction could also occur outside the 23 acres, but within the adjacent historic hospital complex. Development would be sited on former building sites to reestablish and reinforce historic patterns of development and a campus-like setting. Excess pavement would be removed throughout the historic hospital complex and the central hospital courtyard would be reestablished. Significant landscape features and spaces, such as the O'Reilly Avenue and Gorgas Avenue streetscapes, would be retained and rehabilitated. Replacement construction within the 23-acre site and other site improvements within the 60-acre complex would conform with the Planning Guidelines provided in Appendix B. New infill construction elsewhere in the 60-acre Letterman Complex would be subject to future design guidelines developed specifically to address infill construction in the historic complex.

2.3.3 ACTIVITIES AND PROGRAMS

In keeping with the GMPA vision for the Presidio, new development within the complex would be dedicated to scientific research and education focusing on issues of human health, including preventive medicine, nutrition, collaborative eastern/western medicine and health concerns related to the environment. The use of the LAMC auditorium would continue for visitor programs. The LAIR would be retained and used for multi-purpose research by a single tenant or a collaborative group of institutions. Laboratory-based research could continue. If conducted, any research would comply with all federal and state standards for the treatment of laboratory animals. The facilities would be used predominantly by staff, visiting researchers and other special program participants.

Public participation, information and education about ongoing activities would be an important component of all research programs. Through changing exhibits, visitors would learn about current research activities. Seminars, classes and lectures would attract local, regional, national and international participants. Science discovery programs may be provided for different age groups on various facets of biological and physical sciences.

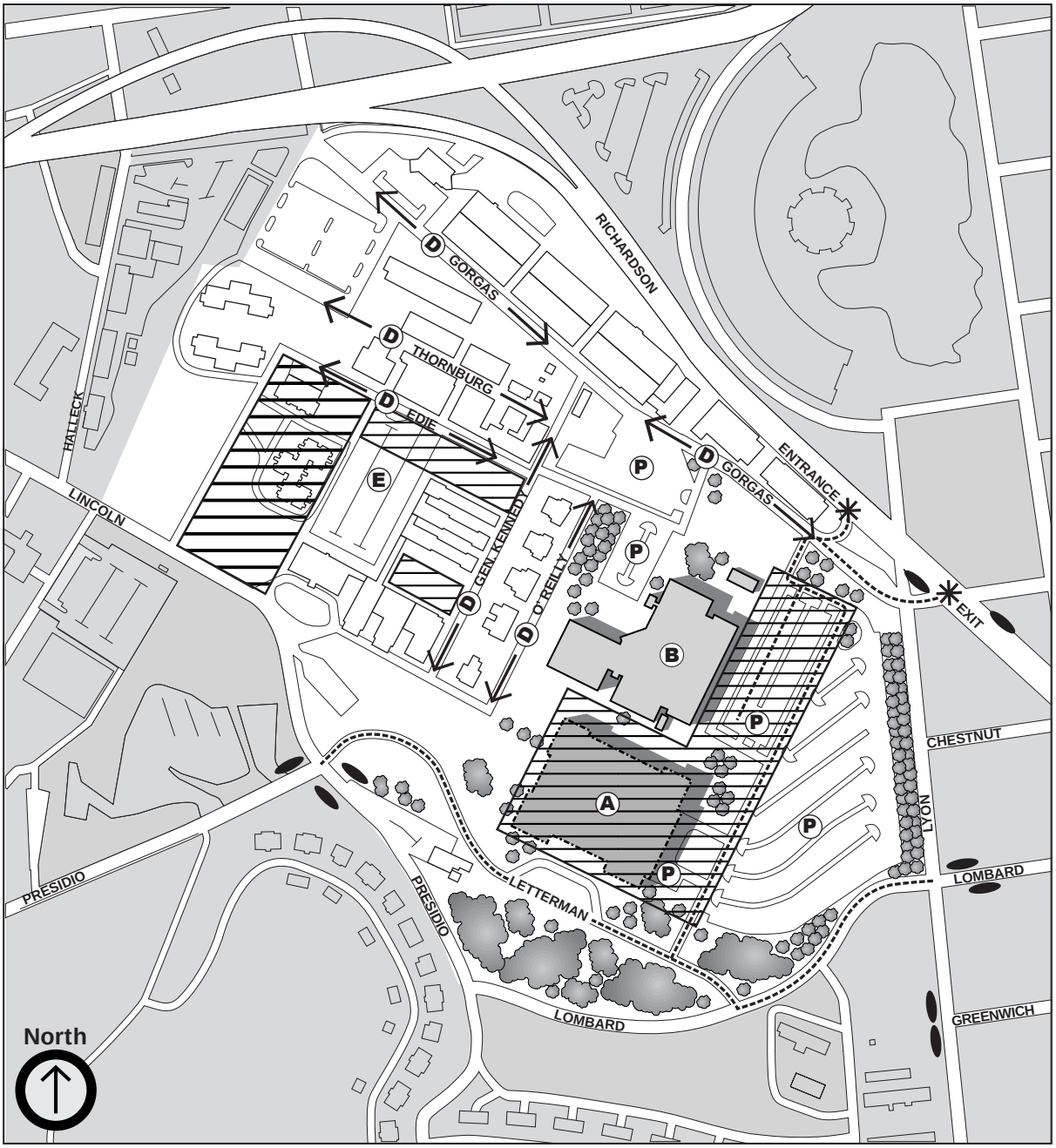


Figure 4. Alternative 1: Science and Education Center

- ✳ Main Vehicular Entrance/Exit to Site
- ---- Primary Traffic Circulation
- (P) On-Grade Parking
- ⬬ Bus Stop
- (A) LAMC: Rehabilitated or Removed
- (B) LAIR
- ←(D)→ Significant Streetscapes to be Retained
- (E) Excess Pavement to be Removed; Area Re-landscaped
- ▨ Potential Sites for New Construction (as identified in NPS 1994c)

Note 1: Parallel parking occurs on streets within project boundaries

Note 2: See Table C-1 for Proposed Building Treatments

The 23-acre site, as well as the remainder of the Letterman Complex, would be incorporated into a Presidio-wide interpretive program and visitor tour. Because of the site's location adjacent to the Lombard Street Gate, it is expected that many first-time visitors would wander into the site first rather than proceeding directly to the visitor center at the Main Post. Hence, information and orientation kiosks (currently under development as part of a Presidio-wide interpretive program) would be centrally located. These kiosks would offer information about the Presidio and GGNRA, points of interest within the Presidio, and maps for orientation around the Presidio (including transit access), and would direct visitors to the Main Post area for more information.

Within buildings, interpretive displays would be located in public spaces as well as the landscape to convey information specific to the history of the Letterman Hospital, its context within the Presidio and related events, such as the Panama Pacific International Exposition. Building lobbies and public meeting spaces would be open to visitors and would provide venues for interpretive panels or displays of historic photographs and information. A system of wayside exhibits being developed for the Presidio would include panels at key locations within the site's open spaces and along major pedestrian routes.

2.3.4 COMMUNITY AND SUPPORT SERVICES

Housing for staff may be available elsewhere in the Presidio. Small-scale food and convenience shops to support staff and visitor needs would be provided nearby. The total employee population of this alternative would be approximately 970 persons (NPS 1994a) and the alternative would attract approximately 75 visitors daily.

2.3.5 ACCESS, CIRCULATION AND PARKING

Lombard Street Gate would continue to be a primary entrance. Once inside the gate, visitors would be directed to all principal destinations within the complex. In general, circulation patterns around the Letterman Complex would be maintained. However, several minor circulation changes would be made to improve safety and aid visitors in finding their way. Changes to the Gorgas Avenue/Lyon Street intersection to eliminate a dangerous crossing would be made in coordination with the California Department of Transportation (Caltrans) and the city of San Francisco. Improvements to the pedestrian and bicycle network would be made to simplify circulation within the complex and establish better connections between the site and other areas. Excess pavement throughout the complex would be removed and the area would be relandscaped and improved for pedestrians. Tenants would be required to manage parking to discourage unnecessary automobile use and the potential for overflow parking in adjacent neighborhoods and areas of the Presidio. The existing parking lot, currently under permit to the Exploratorium/Palace of Fine Arts, would be retained. The total acreage devoted to parking would not increase and would not exceed 1,150 spaces within the Letterman Complex. Parking would be screened from view from Lombard and Lyon streets.

2.3.6 ENVIRONMENTALLY SUSTAINABLE PRACTICES

Per the GMPA and the General Objectives of the GMPA, the Letterman Complex would become a model of environmental protection and sustainable design. Public and private organizations would demonstrate technologies and practices that reduce environmental impacts or produce environmental benefits in energy conservation, solid waste management, transportation, water conservation and reclamation, and waste management. Facilities would be constructed, retrofitted, and operated to minimize adverse effects on natural and cultural resources, be responsive to their setting, and maintain and encourage biological diversity. Energy-

efficient materials and building techniques would be employed, and facilities would be maintained to ensure their sustainability. Conservation principles and practices would be illustrated through design and ecologically sensitive techniques, in accordance with the NPS's *Guiding Principles of Sustainable Design* (NPS 1993a) and the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (NPS 1992a).

2.3.7 PROPOSED SCHEDULE

The GMPA assumed that between 1997 and 1999 an anchor tenant would occupy the LAIR research building, and an anchor tenant or the Trust would begin rehabilitation of the LAMC building or begin new construction if rehabilitation is not economically justified.

2.4 Alternative 2: Sustainable Urban Village

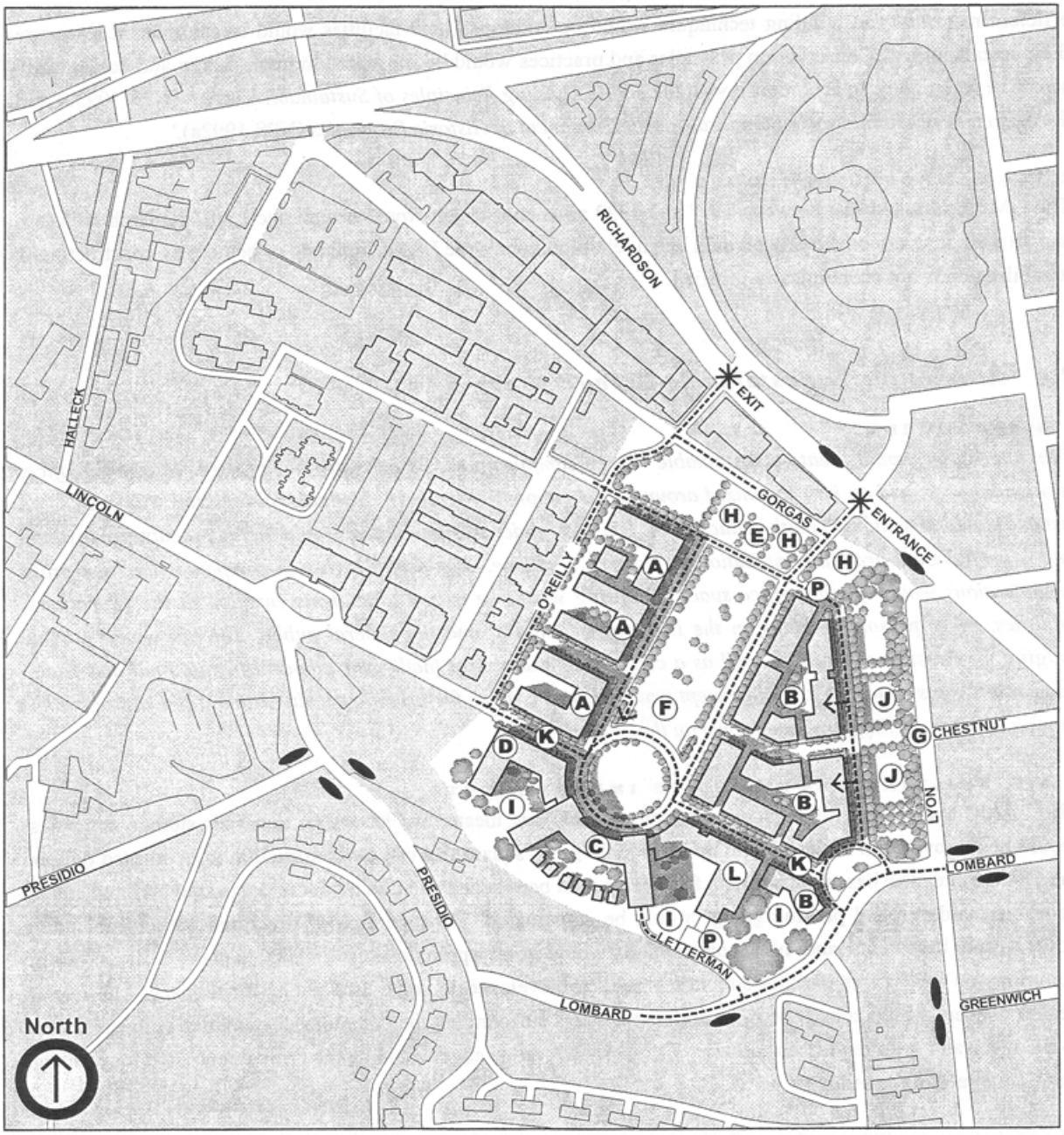
2.4.1 CONCEPT

This alternative would create a sustainable village campus on the 23 acres for health care, education, office, residential uses, and an inn, organized around a "commons" (Figure 5). Institutional facilities would focus on issues related to seniors' health. Educational facilities under this alternative would include a culinary institute and a professional graduate institution for eastern medicine. For-profit, high-tech companies and non-profit organizations would occupy office space. Housing would be leased to students enrolled at the educational facilities, other persons working in the Letterman Complex, and the general public. The inn would provide lodging for Presidio visitors, as well as a conference and retreat facility for adjacent institutional and health research tenants. Integral to this concept would be open space for urban agriculture and aquaculture, with a market place for selling produce grown on the 23-acre site.

2.4.2 BUILDING REMOVAL/SITE IMPROVEMENTS

The LAMC and LAIR buildings, and adjacent non-historic theater and hazardous materials storage structures, would be removed and replaced with up to 900,000 gross square feet of new construction to be located only on the 23-acre site. The basements of both facilities would be retained and utilized for underground parking, and an additional underground parking garage would be constructed. The total area of structured parking, including both reused basements and new construction, would total approximately 280,000 square feet. A central commons on top of this parking structure would be developed to serve as a public open space. The overall design concept would consist of three building clusters surrounding the commons, rectangular in form, sloping to the north and open to Gorgas Avenue. The Gorgas Avenue edge would be the primary entrance for residents and employees of the village.

The inn/retreat would be on the southern edge of the site, on axis with the commons. The inn/retreat would be a four- to five-story structure that contains 180,000 square feet of space. On either side of the inn, the culinary institute and eastern medicine institute would be located in four-story buildings. Along the western edge of the site, office buildings ranging from three to four stories would contain approximately 187,000 square feet of space. Residential units would be located along the eastern edge of the site in two groupings of apartment buildings containing a total of 300,000 square feet, each organized around a central courtyard. These buildings would be a mix of two-, three-, and four-story structures with rental apartments, student housing, and extended-



✳ Main Vehicular Entrance/Exit to Site
--> Entrance to Underground Parking
---- Primary Traffic Circulation
Bus Stop
(A) Office
(B) Residential
(C) Inn/Retreat
(D) Culinary Institute
(E) Water Feature
(F) Central Commons
(G) New Pedestrian Entrance
(H) Greenhouses
(I) Demonstration Gardens
(J) Recreational Areas
(K) Extension of Torney Avenue
(L) Institute on Aging/ Chinese Medicine Institute
(P) On-Grade Parking

Figure 5. Alternative 2: Sustainable Urban Village

Note: Street parking occurs within project boundaries, in addition to where lots are indicated.

stay units for inn guests. The 300 to 400 residential units would accommodate 870 people and would have one level of underground structured parking below them. A wide, open space would be created between the housing area and the Lyon Street wall, in which recreational activities would be located, such as a sports court and a children's playground.

Three greenhouse-like structures would be constructed nearby for the urban agriculture program and would include production and sales areas, and space for an active market place for produce. In addition, herb gardens and demonstration gardens would be placed in several locations throughout the site. A water feature, incorporating water filtration and other new technologies, would allow for commercially productive urban agriculture and aquaculture (subject to additional environmental analysis based on detailed information). Both of the existing tennis courts would be removed and relocated elsewhere in the complex.

2.4.3 ACTIVITIES AND PROGRAMS

This mixed-use development would seek to integrate different program elements and users. As an example, the culinary institute would offer a degree program in culinary arts and sciences and would operate two restaurants that would be open to the public. The senior health research activities would include research on aging, senior day care, and related group and individual programs. The eastern medicine institute would include a research institute and a museum. The inn/retreat would be open for Presidio visitors and would support adjacent educational and institutional tenants. Overall, this mix of education and health programs, with a residential population, high-tech office users and inn/retreat visitors, would offer a lively village atmosphere. An emphasis would be placed on the development as a model for sustainability, fostering the concept of a sustainable urban village.

A visitor center would allow visitors to learn about the history of the Letterman Hospital, as well as other relevant information. Within buildings, interpretive displays would be located in public spaces as well as the landscape to convey information specific to the history of the Letterman Hospital, its context within the Presidio, and related events, such as the Panama Pacific International Exposition. Building lobbies and public meeting spaces would be open to visitors and would provide venues for interpretive panels or displays of historic photographs and information.

The 23-acre site, along with the remainder of the Letterman Complex would be incorporated into a Presidio-wide interpretive program and visitor tour. Because of the site's location adjacent to the Lombard Street Gate, it is expected that many first-time visitors would wander into the site first rather than proceeding directly to the visitor center at the Main Post. Hence, information and orientation kiosks (currently under development as part of a Presidio-wide interpretive program) would be centrally located. These kiosks would offer information about the Presidio and GGNRA, points of interest within the Presidio, and maps for orientation around the Presidio (including transit access), and would direct visitors to the Main Post area for more information. A system of wayside exhibits being developed for the Presidio would include panels within the site's open spaces and along major pedestrian routes.

2.4.4 COMMUNITY AND SUPPORT SERVICES

The central commons would serve as a public open space. The inn/retreat would house approximately 250 guests. Restaurants associated with the culinary institute would be open to the public. A range of 300 to 400

units of housing would be provided for an estimated 870 residents on this site to foster a live-work community or sustainable village. Approximately 400 of the estimated 720 students at the culinary institute would reside onsite. The total employee population of this alternative would be approximately 1,500 persons.

2.4.5 ACCESS, CIRCULATION AND PARKING

Primary vehicular access for residents and tenants would be from Gorgas Avenue. The Lombard Street Gate would be used for visitors and inn guests. A new road would extend from Torney Avenue to intersect with Lombard Street; this would serve as the visitor entrance to the site and the main access to the inn. The existing Letterman Drive would be removed. Automobile circulation would include two-lane circulation through the residential areas and into several designated underground and surface parking areas. A total of 1,020 parking spaces would be provided: 750 spaces would be underground, and 270 spaces on the ground surface. A pedestrian gate in the Presidio wall would be added at Chestnut Street.

Traffic and safety improvements would be made at the Lyon Street/Richardson Avenue/Gorgas Avenue intersection as well as at the Lombard Street/Lyon Street intersection and Lombard Street/Presidio Boulevard intersection. In addition, a new one-way intersection at Gorgas Avenue and Richardson Avenue would be constructed adjacent to building 1160.

A Transportation Demand Management program would be put in place to minimize traffic impacts and encourage pedestrian and bicycle travel as well as transit access. Pedestrians and bicycle riders would be able to enter the complex and use a continuous loop path that connects to existing trails and sidewalks. This would include nature and recreational trails.

2.4.6 ENVIRONMENTALLY SUSTAINABLE PRACTICES

The overall design would incorporate sustainability principles. Specific “green” design elements such as daylighting, natural ventilation, passive solar design for domestic water, use of a thermal rock storage system for cooling, efficient building systems such as low-flow toilets, and use of recycled building products would be used. All buildings would be designed to maximize energy conservation. Specific management plans for each segment of the development and each building, including recycling programs, would be created. Computer controlled, low-flow irrigation systems would be installed and gray water would be used for irrigation (subject to additional environmental analysis based on detailed information). An onsite organic gardening program with a marketplace for produce would utilize composted landscape debris and produce food for onsite use, as well as being a demonstration program.

2.4.7 PROPOSED SCHEDULE

Demolition and deconstruction would commence at the end of 2000. Construction would be done in a single phase, and would begin in early 2001 and be completed in the summer of 2002. Occupancy of the buildings would occur in the summer of 2002.

2.5 Alternative 3: Mixed-Use Development

2.5.1 CONCEPT

This alternative is a mixed-use development on the 23 acres that includes a conference center with lodging, a senior living center, a culinary institute, and office space for non-profit and for-profit organizations (Figure 6). The conference facility would serve as a national and international learning and education center, providing a wide range of activities that include training programs available to the Presidio community. A 350-room lodge would support the conference center and be available for Presidio visitors and tenant needs. The senior living facility would consist of assisted living accommodations and nursing care. Onsite services would provide convenience shopping, food, and other services to Presidio visitors and residents.

2.5.2 BUILDING REMOVAL/SITE IMPROVEMENTS

The LAMC and LAIR buildings, and adjacent non-historic theater and hazardous materials storage structures, would be removed and replaced with up to 900,000 gross square feet of new construction to be located only on the 23-acre site. The basement of these facilities may be retained for reuse. This alternative would include three major building groups around a centralized, rectangular open space, free of cars, known as the "village commons." The commons would slope to the north and open onto Gorgas Avenue. The conference center and lodge would be located at the south end of the site, in four five-story buildings arranged along a pedestrian street.

The 280,000-square-foot, 350-room lodge would include a 35,000-square-foot conference center located in the lodge along with limited retail services. Approximately 200,000 square feet of new, structured underground parking would be constructed under this alternative.

The senior living facility for 135 residents, located on the western side of the village commons in three interconnected buildings of one to three stories each, would contain both assisted living accommodations and nursing care, within 100,000 square feet of space. A covered pergola would be located at the edge of the commons and would extend its entire length.

The office and educational buildings, consisting of five four-story buildings, would be located on the eastern side of the village commons. The educational facility would be approximately 120,000 square feet and the general office space would be 365,000 square feet.

The village commons would feature a functional waterway along the eastern edge to channel storm-water runoff. Excess runoff would be stored in a cistern. This channel may discharge into the existing Palace of Fine Arts lagoon (subject to detailed site planning and further environmental analysis).

2.5.3 ACTIVITIES AND PROGRAMS

The lodge would primarily serve groups using the conference facility; however, it would also be open to other Presidio visitors. The conference center would offer both opportunities and resources for broad educational programs open to the public. Job training, "welfare to work," and recruiting programs would be important aspects of the conference center's overall personnel strategy. The assisted living accommodations would provide a range of educational, recreational, and care programs for participation by community residents. The

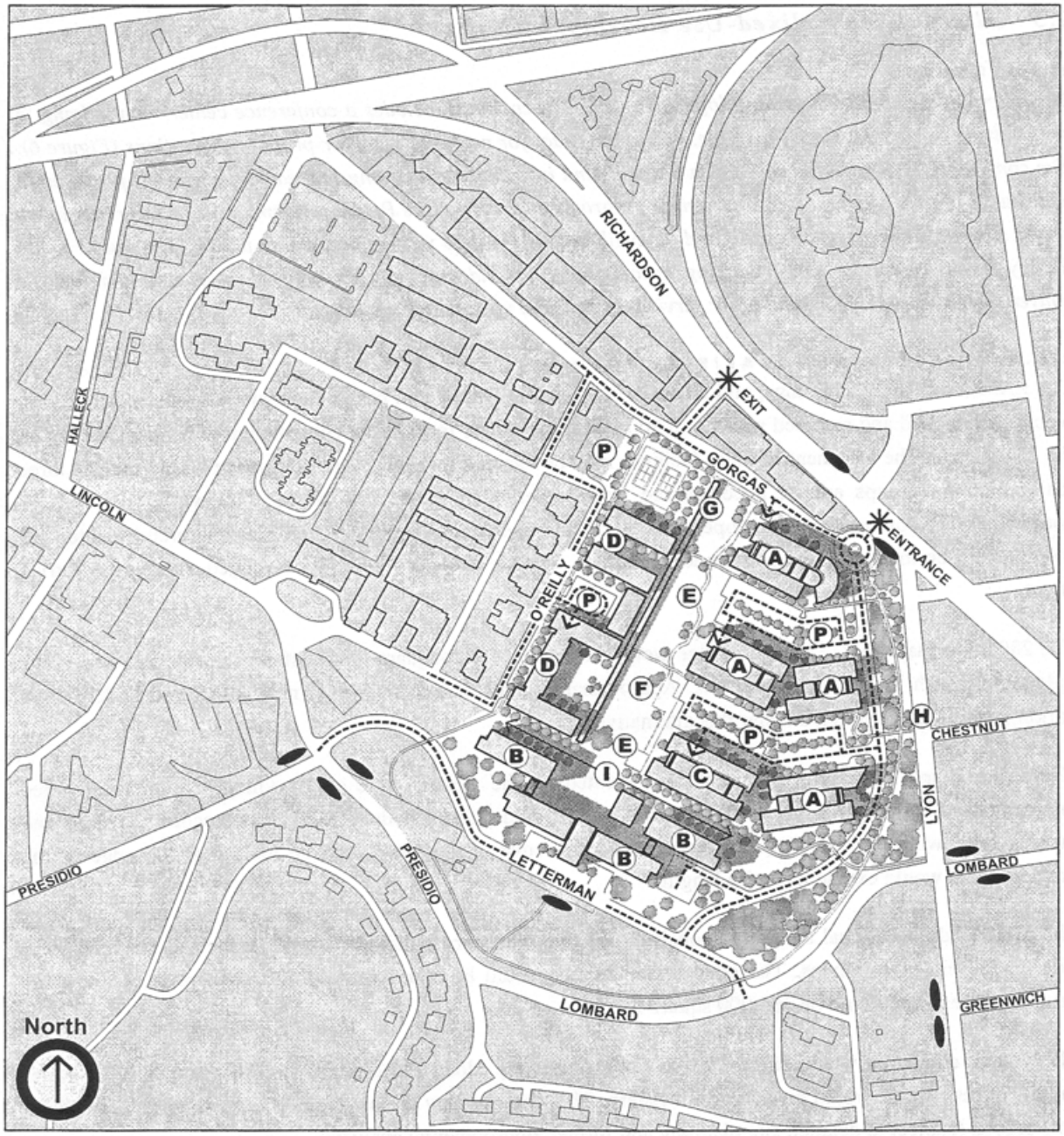


Figure 6. Alternative 3: Mixed-Use Development

- ✳ Main Vehicular Entrance/Exit to Site
- --> Entrance to Underground Parking
- ---- Primary Traffic Circulation
- (P) On-Grade Parking
- ▬ Bus Stop
- (A) Office
- (B) Conference Center & Lodge
- (C) Culinary Institute
- (D) Senior Living
- (E) Waterway
- (F) Village Common
- (G) Covered Pergola
- (H) New Pedestrian Entrance
- (I) Pedestrian Street with Retail & Services

primary institutional facility would be a culinary academy that would include teaching kitchens, classrooms, laboratories, and restaurants open to the public. Approximately 75 percent of the office space would be leased to for-profit organizations and 25 percent to non-profit tenants. In addition, these tenants would offer a variety of programs and events such as exhibits and forums during the year for Presidio tenants and the public.

Interpretive displays would be located in public spaces within buildings as well as in the landscape to convey information specific to the history of the Letterman Hospital, its context within the Presidio, and related events, such as the Panama Pacific International Exposition. Building lobbies and public meeting spaces would be open to visitors and would provide venues for interpretive panels or displays of historic photographs and information. The 23-acre site, along with the remainder of the Letterman Complex, would be incorporated into a Presidio-wide interpretive program and visitor tour. Because of the site's location adjacent to the Lombard Street Gate, it is expected that many first-time visitors would wander into the site first rather than proceeding directly to the visitor center at the Main Post. Hence, information and orientation kiosks (currently under development as part of a Presidio-wide interpretive program) would be centrally located. These kiosks would offer information about the Presidio and GGNRA, points of interest within the Presidio, and maps for orientation around the Presidio (including transit access), and would direct visitors to the Main Post area for more information. A system of wayside exhibits being developed for the Presidio would include panels within the site's open spaces and along major pedestrian routes.

2.5.4 COMMUNITY AND SUPPORT SERVICES

The 350-room lodge and conference center would provide, among other support services, job training, meeting, lodging, culinary institute, restaurants and fitness facilities. The total employee population at the complex would be 2,000 persons. Retail services would be at street level. These services would primarily serve the Letterman community as well as other Presidio tenants, but would also be open to the public; the range of services would include dry cleaning, bicycle rental and storage, a business support center, and some shops. A range of residential accommodations and associated programs for approximately 135 residents would be provided through the assisted living program.

2.5.5 ACCESS, CIRCULATION AND PARKING

Gorgas Avenue would be the primary vehicular entrance, and vehicular circulation would traverse the site's perimeter. A new road from Gorgas Avenue to Letterman Drive along the east would allow drivers to enter from Gorgas Avenue and directly access the parking lots or garages without traveling through the center of the site.

Parking for the complex would be accommodated in both underground structures and on-grade parking lots for a total of 1,670 spaces. Underground parking would be in three separate facilities underneath the office and assisted living buildings, and would accommodate 1,320 cars. Surface parking would be in two lots between the office blocks and would accommodate 350 cars.

Intersection improvements would be made at the Lyon Street/Richardson Avenue/Gorgas Avenue intersection as well as at the Lombard Street/Lyon Street intersection and Lombard Street/Presidio Boulevard intersection to address increased traffic and safety needs. In addition, a new one-way intersection at Gorgas Avenue and Richardson Avenue would be constructed adjacent to building 1160.

A Transportation Demand Management program would be put in place to minimize traffic impacts and encourage pedestrian and bicycle travel as well as transit access. Elements that might be employed are a guaranteed-ride-home program, car sharing, shuttle services, preferential parking program for carpools and vanpools, and provision of incentives to employees for not driving to work.

Two new pedestrian entrances along the Lyon Street wall, at Chestnut and Francisco streets, would provide direct pedestrian access into the complex and link to paths that would cross the site. A new major pedestrian street, parallel to Letterman Drive, would create a pedestrian connection from Torney Avenue to the Lombard Street Gate. In addition, walking and jogging paths would wind around the site to make it more pedestrian-friendly.

2.5.6 ENVIRONMENTALLY SUSTAINABLE PRACTICES

The overall design would incorporate principles of sustainable design and green building techniques and materials. Specific design elements would be used such as daylighting, natural ventilation, photovoltaic or fuel cells for energy, efficient building systems such as low-flow toilets, and use of recycled building products. Energy management systems in all buildings would be designed to maximize energy conservation. Specific management plans for each segment of the development and each building, including recycling programs, would be created. The lodge operation would include a waste reduction and a progressive recycling collection program. Gray water and an onsite collection reservoir would be used for irrigation (subject to additional environmental analysis based on detailed information), and a composting program would be used for food and landscaping debris from the site.

2.5.7 PROPOSED SCHEDULE

Demolition and deconstruction of the LAMC and LAIR facilities would begin towards the end of 2000. Construction would be done in a single phase, beginning in the spring of 2001, with completion of construction by the summer of 2003. Occupancy is expected to begin in 2003.

2.6 Alternative 4: Live/Work Village

2.6.1 CONCEPT

This alternative is a mixed-use village of offices, institutions, housing, and support services on the 23-acre site (Figure 7). The complex would include an anchor tenant devoted to Internet media, communications and education, complemented by a variety of smaller organizations with a mix of for-profit and non-profit groups. Presidio village tenants would focus on conservation, cultural and park issues. The buildings would be clustered around a central "public green," or public park. Housing would be a key component of this alternative to enhance the village-like setting and encourage a live/work community. The public park area would be the gathering place for informal and planned public activities.

2.6.2 BUILDING REMOVAL/SITE IMPROVEMENTS

The LAMC and LAIR buildings, and adjacent non-historic theater and hazardous materials storage structures, would be entirely removed and replaced with up to 900,000 gross square feet of new construction to be located only on the 23-acre site. The village would consist of two primary uses (offices and housing) organized around

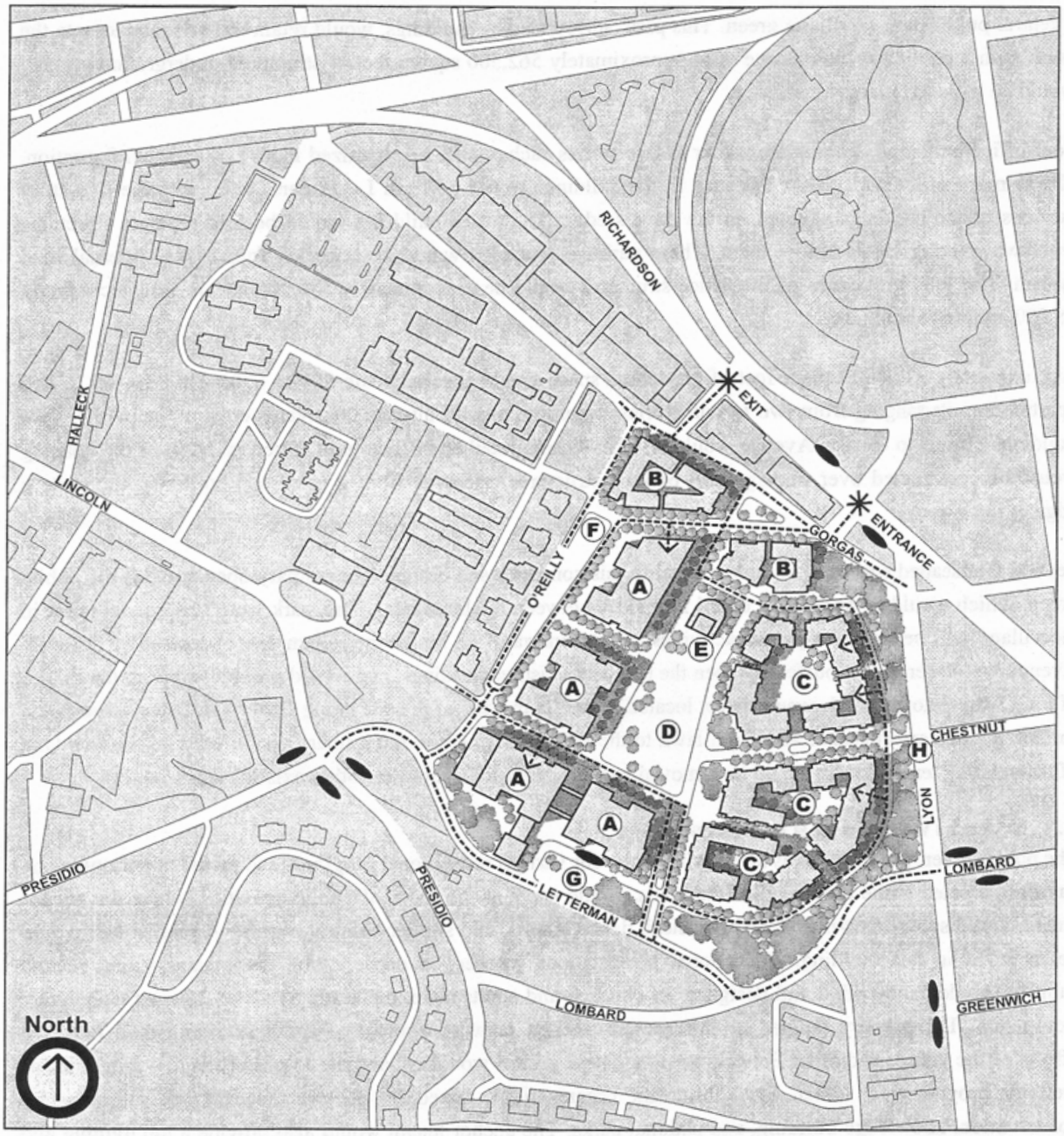


Figure 7. Alternative 4: Live/Work Village

✳	Main Vehicular Entrance/Exit to Site	Ⓒ	Residential
-->	Entrance to Underground Parking	Ⓓ	Village Green
----	Primary Traffic Circulation	Ⓔ	Pavilion
⬬	Bus Stop	Ⓕ	O'Reilly Greensward
Ⓐ	Office	Ⓖ	Formal Greenspace
Ⓑ	Mixed Residential, Office & Retail	Ⓗ	New Pedestrian Entrance

Note: Street parking occurs within project boundaries.

a central public park or village green. This park, surrounded by buildings, would retain the existing slope to the north with a public pavilion at one end. Approximately 562,500 square feet of structured underground parking would be included in this alternative.

Four office buildings, ranging from four to five stories each, would be organized in an L-shaped configuration. The primary office and visitor entrance to the buildings would be from Letterman Drive, with the five-story portions of the buildings situated on the drive's edge. The office buildings would be four separate structures with two parking levels below them. These parking structures would be accessed from a new internal road system. The total gross area of the office structures would be approximately 530,000 square feet, including a 45,000-square-foot library.

Approximately 370,000 square feet of residential space would accommodate 500 to 670 people in 400 to 450 apartment units ranging from two to four stories, organized around internal courtyards open to the public. Two buildings closest to Gorgas Avenue would also have some retail and office uses mixed in. Most of the housing would be constructed over underground parking structures, accessed from a new road bordering the eastern edge of the site.

Several landscaped spaces would be integral to this concept's site design. The primary open space is the public green, which would be accessible on all four sides between the buildings. This park would be a focal point in the village and be used for public activities. A "greensward" (a landscaped open space) created at O'Reilly Avenue would serve as a buffer between the new and existing buildings, and would provide views to the Palace of Fine Arts. Another landscaped space, located at the south edge of the site along Letterman Drive, would be a formal, planted area to serve as a front lawn to the village, adjacent to the primary visitor entry to the site. One of the existing tennis courts would be removed and relocated adjacent to the other existing court.

2.6.3 ACTIVITIES AND PROGRAMS

The public green would serve as an activity center for various recreational programs and picnic opportunities. A pavilion, located at the north end of the green, would serve as the focus of public activities, where the anchor tenant would sponsor art-in-the-park, musical, dance, drama, and similar cultural events. A market hall would be included in this building. Educational presentations focused on conservation, sustainability and related subjects would be provided and designed for children and adults alike, including hands-on Internet technology experience. The primary tenant, an Internet information network company, would support public outreach efforts of the village and other Presidio tenants. These groups would collaborate to provide public programs, as well as programs for other Presidio tenant organizations, based on themes relevant to environmental conservation, knowledge building, and national parks. The anchor tenant would also provide a job training and skills development program to introduce low-income individuals to careers in the multi-media sector. A small-business incubator would specialize in developing women-owned businesses in the field of technology.

The branch library of the California State library system for history and genealogy would attract scholars, researchers and members of the public. Its collection would focus on local history and genealogy. The library would conduct its own public and educational programs based on these themes, supported by the primary tenant's Internet outreach program. The library, in cooperation with the historical society, museum and cultural center, would sponsor seminars, internal training, and Internet assistance to all Presidio tenants and visitors.

The 23-acre site, as well as the remainder of the Letterman Complex, would be incorporated into a Presidio-wide interpretive program and visitor tour. Interpretive displays would be located in public spaces within buildings as well as in the landscape to convey information specific to the history of the Letterman Hospital, its context within the Presidio and related events, such as the Panama Pacific International Exposition. Building lobbies and public meeting spaces would be open to visitors and would provide venues for interpretive panels or displays of historic photographs and information. Because of the site's location adjacent to the Lombard Street Gate, it is expected that many first-time visitors would wander into the site first rather than proceeding directly to the visitor center at the Main Post. Hence, information and orientation kiosks (currently under development as part of a Presidio-wide interpretive program) would be centrally located. These kiosks would offer information about the Presidio and GGNRA, points of interest within the Presidio, and maps for orientation around the Presidio (including transit access), and would direct visitors to the Main Post area for more information. A system of wayside exhibits being developed for the Presidio would include panels within the site's open spaces and along major pedestrian routes.

2.6.4 COMMUNITY AND SUPPORT SERVICES

A range of 400 to 450 residential units would be provided to house a community of 500 to 670 persons. A variety of apartment types would be included with the intent to attract a diverse residential population. Loft-type rental units would be part of the mix to provide live/work opportunities. The housing would support the site's workforce and would also allow for people to work at home. A rental program supporting the Presidio Trust's preferred renters program would be implemented. The total employee population would be 1,400 to 1,700 persons.

Limited retail and support services would be provided for residents and employees, and would be open to park visitors. Meeting facilities would be available for public and community use.

2.6.5 ACCESS, CIRCULATION AND PARKING

The primary vehicular entrance to the site would be from Gorgas Avenue, where a triangular paved plaza would serve as the entry street and create a defined, landscaped site. The street system would include both perimeter and internal roads for access to buildings and the site. The majority of parking would be located underground, directly below the residential and office buildings. This would provide 1,290 spaces. An additional 100 on-street, parallel parking spaces would also be provided.

Intersection improvements would be made at the Lyon Street/Richardson Avenue/Gorgas Avenue intersection as well as at the Lombard Street/Lyon Street intersection and Lombard Street/Presidio Boulevard intersection to address increased traffic and safety needs. In addition, a new one-way intersection at Gorgas Avenue and Richardson Avenue would be constructed adjacent to building 1160.

A Transportation Demand Management program would be put in place to minimize traffic impacts and encourage pedestrian and bicycle travel as well as transit access. Elements that might be employed are a guaranteed-ride-home program, car-sharing, shuttle services, telecommuting policies, a preferential parking program for carpools and vanpools, and provision of incentives to employees for not driving to work.

A system of pedestrian and bicycle paths through the site would serve visitors and residents. All green spaces, including the residential courtyards, would be linked by paths to allow movement across the site including access by the disabled. Six hundred fifty enclosed bicycle parking lockers would be provided, with associated shower and locker facilities for tenants. Public transit buses would be redirected to make stops in this area.

2.6.6 ENVIRONMENTALLY SUSTAINABLE PRACTICES

Buildings would be oriented and sized to maximize natural daylight and ventilation, to minimize use of natural resources. Construction materials would be selected based upon sustainable design considerations such as the use of wood species that have not been over-harvested and are in sustainable production. Materials removed during demolition would be reused where possible. Gray water would be utilized for irrigation (subject to additional environmental analysis based on detailed information) and drought-tolerant plants would be used in new landscaped areas. Operations would include energy management and other strategies to minimize utilization of natural resources on an ongoing basis.

2.6.7 PROPOSED SCHEDULE

Demolition of LAMC and LAIR would commence in the summer of 2000. Construction would begin in the summer of 2001. The residential construction would be completed by the summer of 2001, and the office buildings would be ready for occupancy by the spring of 2003.

2.7 Alternative 5: Digital Arts Center (Preferred Alternative)

2.7.1 CONCEPT

This alternative's concept is a 23-acre office campus for a single institutional user engaged in research, development and production of digital arts and technologies related to the entertainment industry (Figure 8). An archive containing key materials relevant to the development of the digital entertainment industry would be maintained at the center, available to scholars, researchers and educators. A training institute would offer a semester-long curriculum for individuals pursuing careers in the digital arts. A Great Lawn or public park with a water element would be a significant site feature for park visitors and the center's employees.

2.7.2 BUILDING REMOVAL/SITE IMPROVEMENTS

The LAMC and LAIR buildings, and adjacent non-historic theater and hazardous materials storage structures, would be demolished and the basements partially retained for reuse. Nine hundred thousand square feet of new replacement buildings would be located on the 23-acre site in a campus setting, oriented around a 7-acre Great Lawn with a lagoon in the northeast section of the site. The public park would include a water feature, a promenade, a café, and a coffee bar.

Three building groups would be arranged in an L-shaped configuration. These groups would consist of rectangular bar-shaped buildings oriented on an east-west axis that are four stories in height, with a fifth floor under pitched roofs. The bar-shaped buildings would be linked by three-story connecting pieces that have glazed circulation spaces on their outward-facing façades. New buildings would have generous landscaped setbacks and a series of internal courtyards, accessed from within the buildings. Within the largest of the three building groups, a two-story structure would contain shared facilities for the office users.

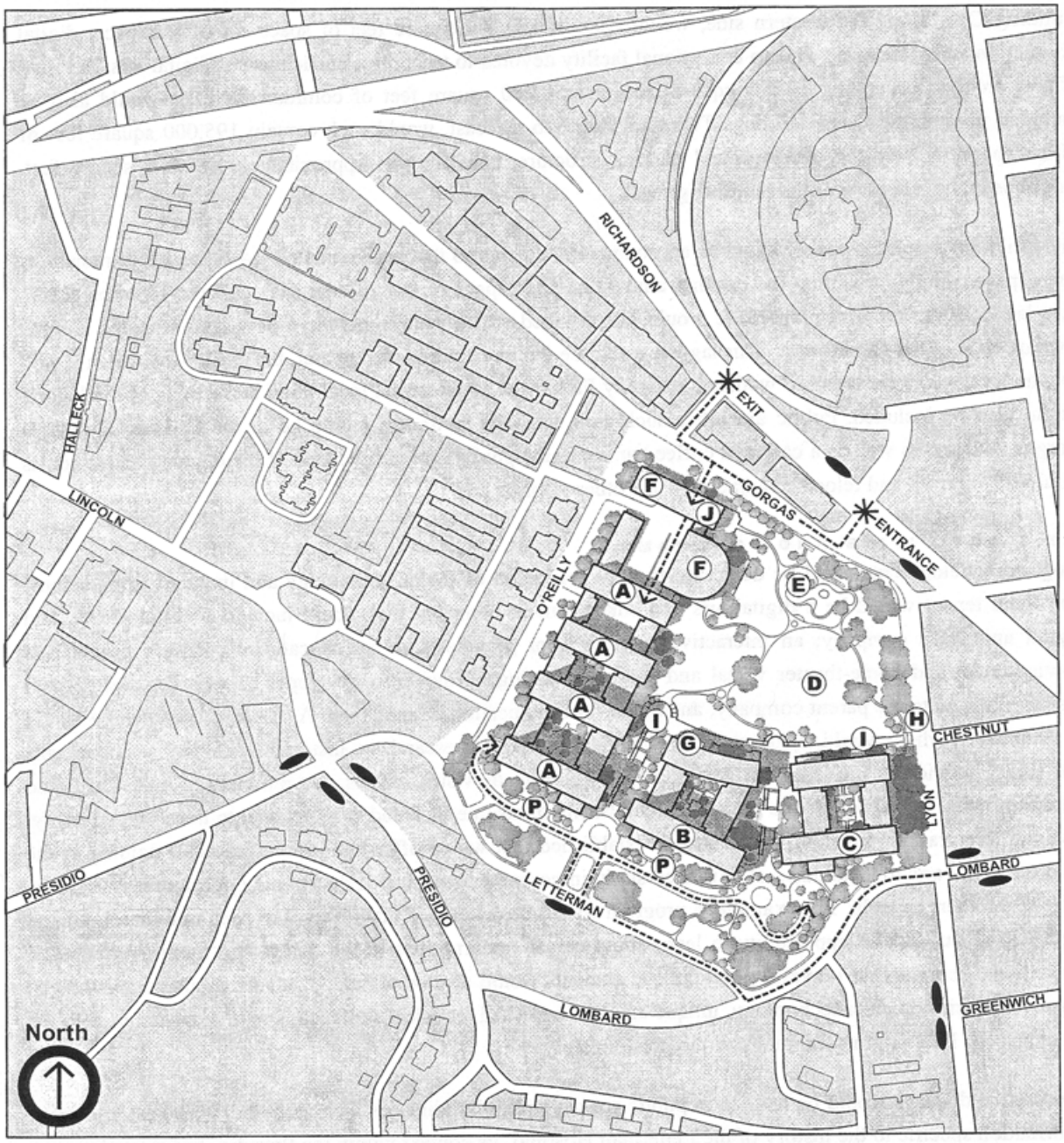


Figure 8.
Alternative 5:
Digital Arts Center

- ✳ Main Vehicular Entrance/Exit to Site
- --> Entrance to Underground Parking
- ---- Primary Traffic Circulation
- (P) On-Grade Parking
- ▬ Bus Stop
- (A) Building One
- (B) Building Two
- (C) Building Three
- (D) Great Lawn
- (E) Lagoon
- (F) Common Facilities
- (G) Coffee Bar
- (H) New Pedestrian Entrance
- (I) Public Promenade
- (J) Public Cafe

Building One, along the western side, would contain 450,000 square feet of space for office space, digital production and craft space, and an educational facility devoted to teaching a curriculum of digital arts. A visual effects archive, occupying 10,000 square feet, and 50,000 square feet of common facilities would also be included in Building One. Buildings Two and Three, to the east, would each contain 195,000 square feet of office space. A two-story underground parking structure, consisting of approximately 589,000 square feet, would be underneath two of the building groups.

The buildings would be concentrated on approximately 8 acres so that approximately 14 acres would remain as open space (roughly doubling the existing amount of open space on the 23-acre site). Of the 14 acres, the 7-acre landscaped park and promenade would be provided which would include a new lagoon at the Gorgas Avenue edge of the open space. This lagoon would be fed by captured stormwater, the outflow of which would eventually drain to the restored wetlands at Crissy Field. An architectural focal point at the edge of the lagoon would also be included. Public amenities such as a café and restrooms would be in the building closest to Gorgas Avenue, as well as a café and coffee bar along the public promenade. One of the existing tennis courts would be removed and relocated adjacent to the other existing court.

2.7.3 ACTIVITIES AND PROGRAMS

Program development would be dedicated to the exploration of digital technology and its many applications. The main tenant would be a digital arts and entertainment company that would include a visual effects and digital animation company; an interactive entertainment provider; and an educational software provider; a movie screen and home-theater visual and sound technology provider; a developer of websites and content provider related to the parent company; and a non-profit educational foundation. A visual effects archive would be established which would make materials available to industry researchers, historians, scholars, academicians and other individuals interested in studying the evolution of visual effects. A museum of visual arts and technology that would be open to the general public might also be included as an adjunct to the archive facility. A digital arts training institute would also be established that would offer tuition-free intensive training in the field of digital arts to candidates of advanced study in computer graphics. Educational opportunities would be offered to others as well. For example, a program would be developed that offers Bay Area middle school and high school students an opportunity to learn about career opportunities in the digital and multi-media fields. Educational seminars for university and college students would also be offered. Tenants would be encouraged to provide their computer technology, unique and distinguished technical skills, and creative talents to help the Trust and the NPS present and interpret the Presidio story.

Interpretive displays would be located in public spaces within buildings as well as in the landscape to convey information specific to the history of the Letterman Hospital, its context within the Presidio, and related events, such as the Panama Pacific International Exposition. Building lobbies and public meeting spaces would be open to visitors and would provide venues for interpretive panels or displays of historic photographs and information. The 23-acre site, along with the remainder of the Letterman Complex, would be incorporated into a Presidio-wide interpretive program and visitor tour. Because of the site's location adjacent to the Lombard Street Gate, it is expected that many first-time visitors would wander into the site first rather than proceeding directly to the visitor center at the Main Post. Hence, information and orientation kiosks (currently under development as part of a Presidio-wide interpretive program) would be centrally located. These kiosks would offer information

about the Presidio and GGNRA, points of interest within the Presidio, and maps for orientation around the Presidio (including transit access), and would direct visitors to the Main Post area for more information. A system of wayside exhibits being developed for the Presidio would include panels within the site's open spaces and along major pedestrian routes.

2.7.4 COMMUNITY AND SUPPORT SERVICES

It is expected that the main tenant would work in collaboration with the NPS and the Presidio Trust to apply its digital arts skills in developing interpretive opportunities to be used throughout the Presidio. Some of these interpretive displays would be located on the site, both inside and outside. In addition, an outreach coordinator would be on the staff of the main tenant to work with other Presidio tenants to develop collaborative and joint service programs. The public areas of the digital arts center would be open to visitors, and would contain historic interpretive materials as well as material about the main tenant. A group of screening/meeting rooms located near the main visitor entrance would be offered for community use. The Great Lawn would be open for public use and enjoyment. A café, a coffee bar, and restrooms would be in close proximity to the Great Lawn to serve as public amenities.

Approximately 2,500 employees would work at this site. It is anticipated that some employees would live in housing found elsewhere on the Presidio. Food service, physical fitness, and childcare facilities would be provided within the center for use by these employees.

2.7.5 ACCESS, CIRCULATION AND PARKING

The main visitor entrance to the center would be from Letterman Drive, with employees entering an underground parking structure off of Gorgas Avenue. The underground parking would be for approximately 1,500 vehicles. An additional 30 aboveground spaces would accommodate limited short-term visitor parking. No roads would cross through or ring the edges of the site. The visitor entrance would be located along Letterman Drive, where a driveway and passenger drop-off point would be located. This driveway would also provide access to the underground parking for visitors.

Intersection improvements would be made at the Lyon Street/Richardson Avenue/and Gorgas Avenue intersection as well as at the Lombard Street/Lyon Street intersection and Lombard Street/Presidio Boulevard intersection to address increased traffic and safety needs. In addition, a new one-way intersection at Gorgas Avenue and Richardson Avenue would be constructed adjacent to building 1160.

A Transportation Demand Management program would be put in place to minimize traffic impacts and encourage pedestrian and bicycle travel as well as transit access. Elements that might be employed are an onsite transportation coordinator, a guaranteed-ride-home program, a webpage devoted to transportation alternatives, flex-time policies, telecommuting policies, onsite support services, and a preferential parking program for carpools and vanpools.

A new pedestrian gateway in the Presidio wall at Chestnut Street would create a formal pedestrian walk, and would provide for east/west circulation across the site. This walk would lead to the center of the site and intersect with the main visitor entry walk. In addition, an extensive network of pedestrian paths between the buildings and surrounding the Great Lawn would allow pedestrians to move across the site. The north edge of

the site, along Gorgas Avenue, would be continuously open, allowing direct pedestrian access to the open space. A system of curvilinear pedestrian walks would wind through the open space.

2.7.6 ENVIRONMENTALLY SUSTAINABLE PRACTICES

The overall design would incorporate sustainable design principles, and would use the U.S. Green Building Council's Leadership in Environmentally Efficient Design (LEED) rating system to achieve a high standard for performance. The buildings would maximize natural daylighting while moderating thermal gain. The relatively narrow width of the buildings, the courtyard design, and the use of light shelves and other light-bouncing devices would maximize daylight performance. Operable windows, displacement ventilation and natural cooling would capitalize on the Presidio's climate to reduce the need for air conditioning. Efficient building systems such as raised floors, displacement-cooling using ground source heat sinks, low-flow toilets, and recycled building products would be used. A water resource management system would include the capture and reuse of storm-water and normal runoff (through an underground cistern storing rainwater, and re-collecting irrigation water). This water would be used for landscape irrigation, after biofiltering through the lagoon and wetlands. Energy management systems in all buildings would be designed to maximize energy conservation. Specific management plans for each segment of the development and each building, including recycling programs, would be created. The existing LAMC basement would be utilized in part as an underground cistern to store captured rainwater for reuse onsite.

2.7.7 PROPOSED SCHEDULE

This alternative would be constructed in one continuous construction program. Building One would commence with the deconstruction and demolition of the LAMC and LAIR facilities, projected to begin in the third quarter of 2000. Construction would be complete by the fourth quarter of 2004. Buildings Two and Three, and all remaining site improvements, would commence in the fourth quarter of 2002 and be completed by the fourth quarter of 2004.

2.8 Alternative 6: Minimum Management (No Action)

2.8.1 CONCEPT

Under this alternative (Figure 9), the Presidio Trust would manage the 23-acre site in accordance with 1) the purposes set forth in Section 1 of the Act that established the GGNRA (Public Law 92-589) and 2) the General Objectives of the Presidio GMPA. Programs would be designed to reduce expenditures by the Trust and increase revenues to the federal government to the maximum extent possible subject to applicable environmental compliance statutes. The Presidio Trust would be responsible for the management of leases and uses of all buildings.

2.8.2 BUILDING REMOVAL/SITE IMPROVEMENTS

The Presidio Trust would consider the extent to which uses and tenants would contribute to the GMPA and to the reduction of cost to the federal government. LAMC would be "mothballed"; LAIR would be permitted/leased for office and research use without major rehabilitation. This building would be brought into compliance with federal building codes and regulations appropriate to use and occupancy to the extent

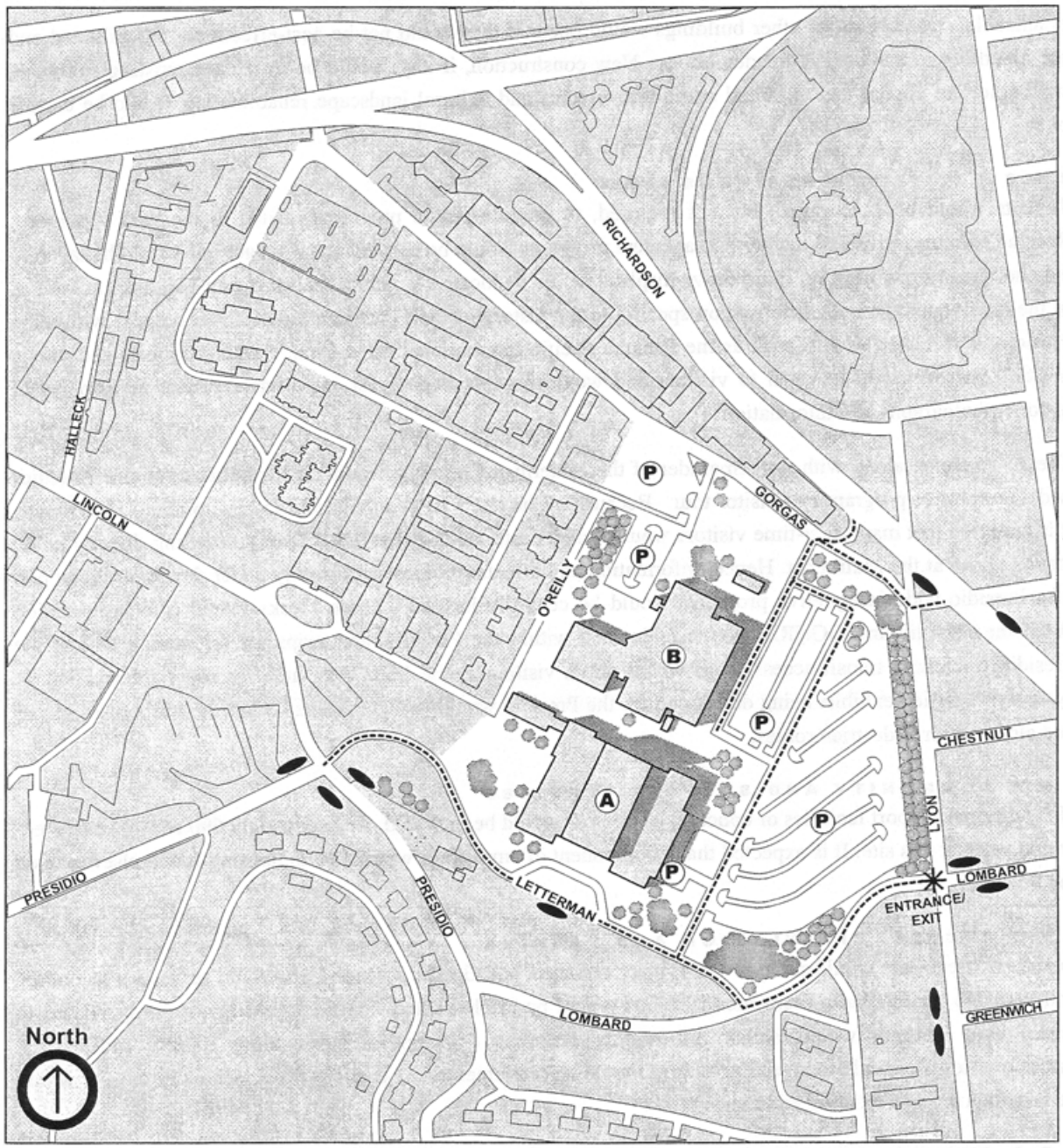


Figure 9.
Alternative 6:
Minimum Management

Ⓐ LAMC

Ⓑ LAIR

Bus Stop

✳ Main Vehicular Entrance/Exit to Site

------ Primary Traffic Circulation

Ⓟ On-Grade Parking

practicable. Demolition of other buildings would occur if they could not be cost-effectively rehabilitated and are identified in the GMPA for demolition. New construction, if any, would be to replace existing structures with others of similar size. Limited site improvements and cultural landscape rehabilitation would be carried out.

2.8.3 ACTIVITIES AND PROGRAMS

Tenants would be encouraged, but not required, to provide public programs related to the park's purpose. Routine administrative and facility management programs would be carried out. Few actions would be taken to expand visitor opportunities. Interpretive displays would be located in public spaces within buildings as well as in the landscape to convey information specific to the history of the Letterman Hospital, its context within the Presidio, and related events, such as the Panama Pacific International Exposition. Building lobbies and public meeting spaces would be open to visitors and would provide venues for interpretive panels or displays of historic photographs and information.

The 23-acre site, along with the remainder of the Letterman Complex, would be incorporated into a Presidio-wide interpretive program and visitor tour. Because of the site's location adjacent to the Lombard Street Gate, it is expected that many first-time visitors would wander into the site first rather than proceeding directly to the visitor center at the Main Post. Hence, information and orientation kiosks (currently under development as part of a Presidio-wide interpretive program) would be centrally located. These kiosks would offer information about the Presidio and GGNRA, points of interest within the Presidio, and maps for orientation around the Presidio (including transit access), and would direct visitors to the Main Post area for more information. A system of wayside exhibits being developed for the Presidio would include panels within the site's open spaces and along major pedestrian routes.

2.8.4 COMMUNITY AND SUPPORT SERVICES

No additional support facilities or concession services would be provided. Approximately 690 to 700 employees would work at this site. It is expected that a component of employees would live in housing found elsewhere on the Presidio.

2.8.5 ACCESS, CIRCULATION AND PARKING

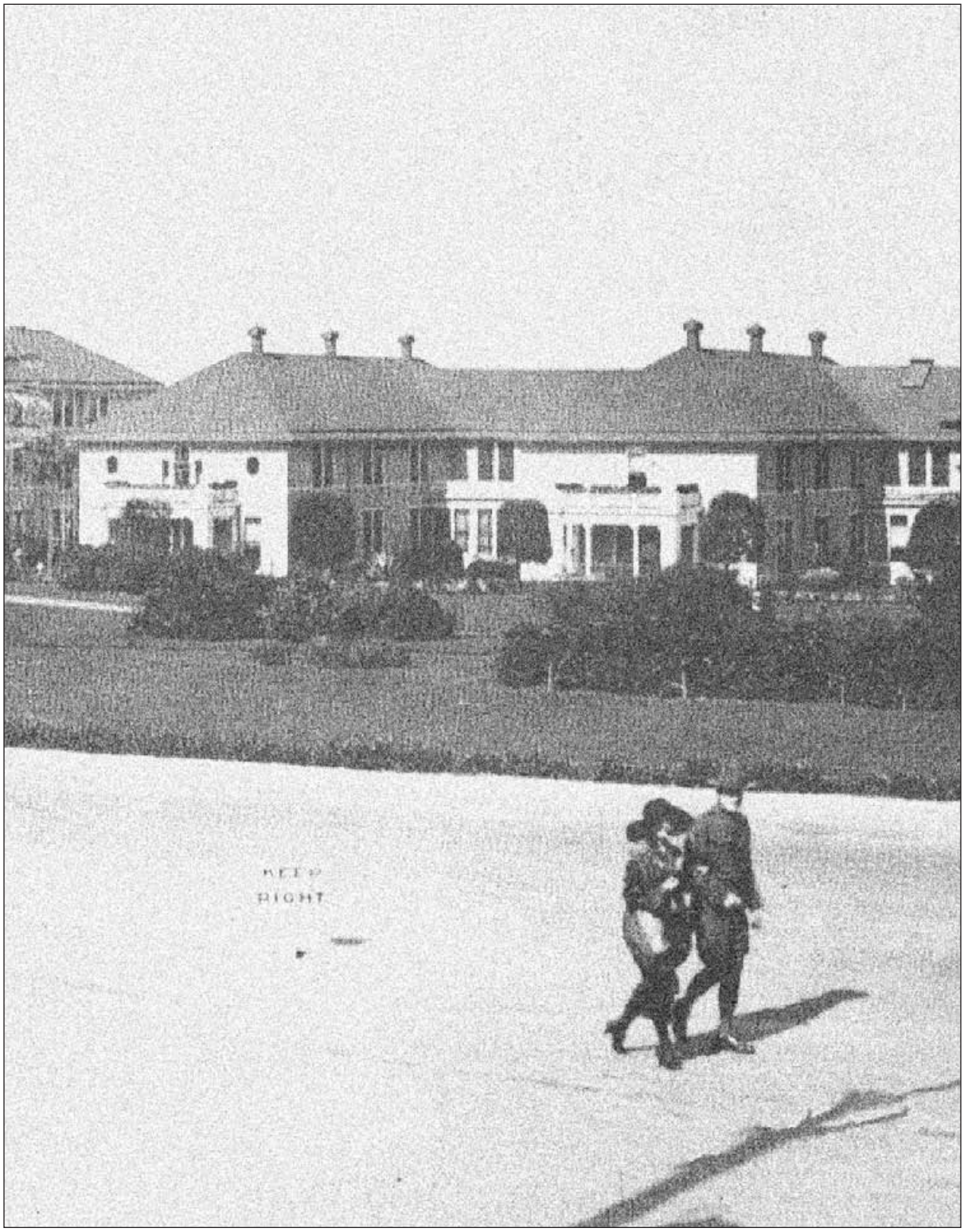
Lombard Street Gate would serve as the primary entrance, and Gorgas Avenue Gate would serve as a secondary entrance. No major road system modifications would be implemented. Traffic would be primarily related to tenant uses. Parking would remain in existing locations (770 spaces surrounding LAMC and LAIR). Transportation Demand Management actions would be implemented. Adequate public access to the site would be provided through existing entrances.

2.8.6 ENVIRONMENTALLY SUSTAINABLE PRACTICES

Under this alternative, the site would be managed in a manner that is consistent with sound principles of land use planning and management. Environmentally sustainable practices would be examined for carrying out routine administrative and facility management programs.

2.8.7 PROPOSED SCHEDULE

Assuming the LAMC would remain unoccupied, LAIR's full occupancy would be achieved by 2004. This schedule also assumes that sufficient interest could be solicited from prospective tenants.


KEEP
RIGHT

This section describes the environment of the area to be affected by the alternatives under consideration. A more complete description of the 23-acre site, the Presidio's Letterman Complex, and the historical character and underpinnings of both is set forth in Section 1.1, Background, and should be read together with the more summary information provided below in Sections 3.1 and 3.2.

3.1 The Presidio

The 1,480-acre Presidio of San Francisco is at the northern tip of the San Francisco peninsula on the south side of the Golden Gate. On its southern and eastern boundaries is the city of San Francisco, on the west the Pacific Ocean, and on the north San Francisco Bay. Designated a National Historic Landmark in 1962, the Presidio represents over 200 years of military history under three nations' flags. Until its closure, the post played a logistical role in every U.S. military engagement since the Mexican-American War and supported America's global efforts during the Spanish-American War and World Wars I and II. The park is a showcase of military architectural styles dating from before the Civil War; it contains 780 buildings, 470 of which have historic and cultural significance.

The Presidio is a place of unparalleled scenic beauty, with spectacular views of the Pacific Ocean, the coastline, the Golden Gate, and the city of San Francisco. It has more than 800 acres of undeveloped open space, including native plant communities that support rare and endangered plant species and provide valuable wildlife habitat. The Presidio's coastal landscape and dunes offer extraordinary natural integrity and diversity.

The Presidio was designated part of the GGNRA in 1972. Selected for closure as a military base in 1989, its jurisdiction transferred to the NPS in 1994. Between 1990 and 1994, the NPS conducted a public planning process to develop a plan for the Presidio. Approved in 1994, the Presidio GMPA outlines a vision for the preservation and enhancement of the park, including guidance for its management, use and development. Congress created the Presidio Trust with the passage of the Presidio Trust Act in 1996. Administrative jurisdiction over most of the Presidio (including all of the Letterman Complex) transferred from the NPS to the Presidio Trust in 1998.

The Presidio is bordered by the Marina, Cow Hollow, and Pacific Heights planning districts on the east and the Presidio Heights, Richmond, and Seacliff planning districts on the south. These neighborhoods are primarily residential, although land uses in the Richmond and Marina districts tend to become more commercial toward the city center. The housing bordering the Presidio is some of the most expensive in San Francisco.

3.2 Letterman Complex

The Letterman Complex occupies an area in the Presidio's northeast corner and for more than a century has served as an active and urbanized building and activity core within the Presidio. Lyon Street, Lombard Street, Presidio and Lincoln boulevards, the Tennessee Hollow riparian corridor, and Richardson Avenue border the site to the east, south, southwest, northwest and north, respectively. Access to the complex is provided by the Lombard Street Gate to the east, and by the eastbound lane of Doyle Drive (U.S. Highway 101) and Lincoln Boulevard to the north and west.

The Letterman Complex contains 44 buildings, dominated by two non-historic multi-story structures, the 451,000-square-foot LAMC and the 356,000-square-foot LAIR (Figure 10). Of these buildings, 35 are historic and contribute to the National Historic Landmark district. This is the most urbanized area of the Presidio with another approximately 493,000 gross square feet of built space in a range of historic low-rise buildings. The original hospital complex, which has been significantly altered over time, includes the former hospital wards, clinics, offices, warehouses, and ancillary buildings, including the Gorgas Avenue warehouses. Non-historic buildings include the former nurses' dormitories to the west and the shopette. The historic buildings reflect a variety of architectural styles from Colonial Revival buildings to Mediterranean Revival structures dating from 1899 to the 1940s. The 154,000-square-foot Thoreau Center for Sustainability exists within buildings recently rehabilitated in the historic complex. The site also contains surface parking lots, landscaped areas and approximately two miles of roadways.

The original hospital was established in 1898 as a result of the Spanish-American War. Letterman Hospital served as the U.S. Army's largest hospital at the time of World War I. Later, the hospital helped pioneer the use of female Army nurses and led in the development of physical therapy techniques. The complex provided medical services to soldiers for almost a century, becoming the nation's busiest hospital in World War II. The complex evolved into a major teaching and research facility with construction of the LAMC and LAIR on its eastern end in the late 1960s and early 1970s.

Before the medical complex was built, the site abutted a wetland area extending along the bay on the northern edge of the post. Today, only a small stream valley remains where waters ran south to north into the wetland.

3.3 Consistency with Approved Plans and Policies

This section discusses the relationship of the project alternatives with the Trust Act and approved land use plans for the area surrounding the Letterman Complex. Formally adopted documents for land use planning that bear on the project alternatives include the *Presidio General Management Plan Amendment* and the *General Plan of the City and County of San Francisco*.

3.3.1 PRESIDIO GENERAL MANAGEMENT PLAN AMENDMENT

The final Presidio GMPA (NPS 1994a) is an amendment to the 1980 *General Management Plan* for the GGNRA (NPS 1980). In 1994, the NPS adopted the GMPA to guide planning for the Presidio. The GMPA is contained in the 150-page document entitled *Creating a Park for the 21st Century: From Military Post to National Park; Final General Management Plan Amendment*, Presidio of San Francisco, Golden Gate National Recreation Area, California, dated July 1994, and prepared by the NPS.

General Objectives of the GMPA – Initial drafts of the legislation that eventually became the Trust Act required the Trust to manage the Presidio in accordance with the GMPA (U.S. Congress 1993, 1995). In the final legislation, however, the term "general objectives" was added in recognition of both the Trust's need for flexibility in light of changing circumstances and the need to meet the year 2013 deadline for financial self-sufficiency.

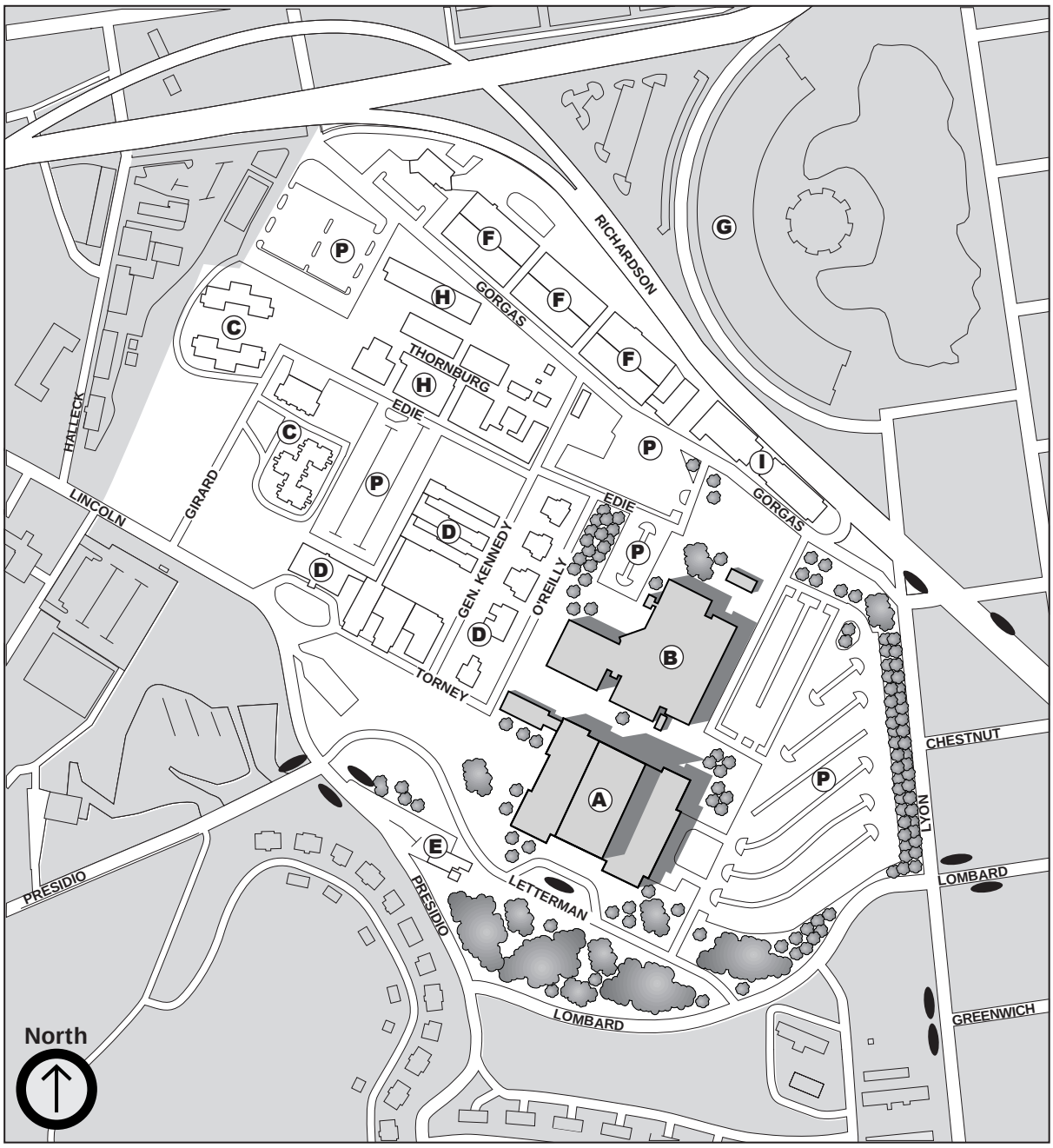


Figure 10. Existing Conditions

- Bus Stop
- (P) Parking
- (A) Hospital (LAMC)
- (B) Research Facility (LAIR)
- (C) Dormitories
- (D) Thoreau Center for Sustainability
- (E) Buildings 558/559
- (F) Warehouses
- (G) Palace of Fine Arts (Exploratorium)
- (H) Historic Letterman Hospital Buildings
- (I) YMCA Gym and Pool

In this regard, the U.S. House of Representatives' Resources Committee noted that the cost of the plan for the Presidio as completed by the NPS is unrealistic.[1] Congress, therefore, explicitly did not accept the GMPA as a governing document in all its particulars because of conflicts with the economic requirements and the changing user environment already evident in 1996 when the Trust Act passed. Therefore, as a matter of law, the Presidio Trust is required to manage the Presidio in accordance with the General Objectives of the GMPA, which are identified in Section 1.1.5. Nevertheless, as a matter of policy, the Trust uses the GMPA as its principal plan for all Presidio activities, from establishing planning priorities to managing resources.

GMPA Goals and Planning Principles – The GMPA establishes management direction and implementation strategies for converting the Presidio from a military post to a national park. Rather than providing an exact blueprint for the Presidio, the GMPA proposes overall concepts for change, including treatments and uses of the varied resources, and new programs and activities that are appropriate in the national park setting. The GMPA acknowledges that detailed site plans and specific programs will be developed in the future based on the directions established in the GMPA.[2] The GMPA also establishes program themes and suggests the kinds of park partners that would provide programs and services, occupy and maintain facilities, and contribute to park goals in other ways.[3]

The concept for the Letterman Complex proposed in the GMPA is continued use as a center for scientific, research or educational activities. Because it was not known whether the use identified could be satisfied or a specific user found, the GMPA left open the possibility of new replacement construction, subject to further environmental analysis. With new construction being limited to developed areas and significant constraints on the amount of new construction allowed in other planning areas, Letterman had by far the largest potential for new replacement construction. In total, however, any new construction within the Letterman Complex is constrained by the GMPA's identification of 1.3 million square feet as the maximum allowable gross square footage for the complex.

With respect to the GMPA's site-specific proposal for LAMC and LAIR, the GMPA assumed that LAIR had significant reuse potential and specified use of the LAIR for research purposes by a single tenant or collaborative group of institutions. The reuse potential of LAMC at the time of the GMPA was not as clear. Therefore, if LAMC cannot be reused, the GMPA envisions partially or entirely removing the functionally obsolete LAMC building and several other buildings, both historic and non-historic, to enhance open space. To accommodate a change in use, the GMPA permits new construction if existing buildings and improvements do not meet essential program and management needs, so long as new construction is compatible with the historic buildings and setting. As a substitute for existing buildings designated for potential demolition, specifically the potential removal of LAMC, up to 503,000 gross square feet of replacement construction is permitted under the GMPA. The GMPA also encourages infill construction that reinforces the historic hospital complex's courtyard

[1] The House Resources Committee noted: "The Committee finds that the cost of the plan for the Presidio as completed by the NPS is unrealistic. While the Committee does endorse the "general objectives" of the [GMPA], the Committee recognizes that development of a reasonable program is essential to ensure the success of the Presidio Trust and the long-term preservation of the historical and other resources of the Presidio." (U.S. Congress 1994: see H.R. Rep. No. 104–234 (August 4, 1995)).

[2] The planning concept and direction for the Letterman Complex is described under Alternative 1 in Section 2.3 of this document.

[3] Programs that would be consistent with the General Objectives of the GMPA and tenant or user enhancements that would achieve Presidio goals are discussed in Section 1.3 of this document.

and campus-like setting, and specifies the height of new construction not to exceed the height of the LAIR building (60 feet).

3.3.2 GENERAL PLAN OF THE CITY AND COUNTY OF SAN FRANCISCO

The Presidio is under exclusive federal jurisdiction and therefore is not subject to state and local land use plans and policies. The Presidio Trust seeks to reduce possible conflicts between Trust activities and city policies and consults with the city to achieve consistency wherever possible. Lacking any jurisdiction, the city has not developed any site-specific plans for Presidio property. The *San Francisco General Plan* (City and County of San Francisco n.d.) contains general land use policies and objectives for San Francisco. It includes housing, transportation and commercial policies, and a recreation and open space element that specifically mentions the Presidio. Generally, the plan supports the preservation of San Francisco's relatively dense mixed-use neighborhoods. There is an emphasis on public transit and pedestrian use rather than on the automobile.

3.4 Solid Waste

3.4.1 REGULATIONS

The State of California authorizes a local enforcement agency (a city or county) to permit, inspect, and enforce solid waste handling and disposal activities in its jurisdiction. A variety of types of disposal sites are permitted, including municipal solid waste facilities which receive domestic solid waste as well as a various other waste types. For example, construction and demolition debris disposal sites specialize in the disposal of construction and demolition debris as well as its diversion from the waste stream through various recycling techniques. Other waste sites accept strictly regulated types of waste. Some solid waste facilities are permitted to accept a broad range of the waste types described above. A federal agency disposing of waste at one of these permitted sites must comply with all appropriate state and local laws.

3.4.2 SOLID WASTE GENERATION

The Presidio Trust handles solid waste disposal through contracts with private haulers. According to the latest available estimates, approximately 22,000 tons of solid waste are generated at the Presidio every year and disposed of in Contra Costa County waste disposal sites (U.S. Army Corps of Engineers 1991). These estimates are conservative, because the Presidio Trust is developing a comprehensive waste management system to minimize the park's impact on the solid waste stream. In 1999, the Presidio Trust diverted at least 30 percent of the materials from the Presidio's waste stream through programs in waste reduction, recycling, composting, salvage and reuse. The Presidio Trust will pilot a composting program that eventually will include every residential and non-residential building in the park. The Presidio Trust is also developing a community recycling and waste reduction education center and offering educational and training programs related to solid waste management.

There are 21 solid waste landfill sites in the nine-county Bay Area (California Integrated Waste Management Board and State Board of Equalization 1997). The number of solid waste disposal sites available for the disposal of waste from the Presidio increases to 27 when adjacent counties, such as San Joaquin and San Benito, are included.

3.5 Water Supply and Distribution

3.5.1 PRESIDIO WATER SUPPLY

The Presidio Trust has water resource management responsibilities and authorities to provide water to Presidio users, including those located within the Letterman Complex. The City and County of San Francisco (CCSF) historically supplied up to one-third of the Presidio's water demand, and several points of interconnection are currently maintained between the CCSF water supply system and the Presidio. Because the Presidio is now only partially occupied, Presidio water has been supplied primarily from Lobos Creek. Lobos Creek is a 1.3-mile free-flowing stream that drains an approximately 3.2-square-mile drainage basin. Lobos Creek is the last remaining urban coastal stream in San Francisco that drains into the Pacific Ocean. Diversions from this water resource are limited by natural stream flow volumes and by resource protection policies and objectives established in the Presidio GMPA. Lobos Creek is in Area A, the coastal area of the Presidio under NPS jurisdiction and management.

The main source of water for Lobos Creek is the Lobos groundwater drainage basin, a 3.2-square-mile underground aquifer extending from under the southwest quarter of the Presidio south to Golden Gate Park and west to the Palace of the Legion of Honor. The aquifer is recharged directly by rainwater and indirectly by flows that leak under the paved streets of San Francisco. The outfall from the aquifer flows both on the surface via Lobos Creek and underground via permeation below sea level at roughly equal rates. The aquifer is also the source of water for Mountain Lake on the Presidio and several wells in the vicinity. Mountain Lake apparently does not have any direct surface connection to Lobos Creek.

The surface of the groundwater recharge area is primarily sand dune geology. The ground consists of sand blown into layers over thousands of years from beaches along the Pacific Ocean. The shape of the creek bed follows the clay Colma Formation several meters below the stream. The steep drop of the Colma Formation at Baker Beach results in a one-way outfall from Lobos Creek to the Pacific Ocean.

The Lobos Creek drainage basin captures an average annual rainfall of 23 inches per year. Rainfall has the potential to contribute to creek flows, but because most of the unpaved land north of Lobos Creek is composed of northern dune sands, rainfall is readily absorbed into the ground to recharge the aquifer. Thus, little surface runoff collects in the Lobos Creek bed for immediate downstream flow.

Daily flow in Lobos Creek ranges from 1.2 million gallons per day (mgd) in dry years to 2.1 mgd in wet years and minimum stream flow of 500,000 gallons per day, or 0.5 mgd, has been estimated to be the basic in-stream flow necessary to ensure resource preservation.

3.5.2 PRESIDIO WATER DEMAND

At full occupancy of the Presidio, average daily demand for water (both domestic and irrigation) is estimated to range from 1.1 mgd under low use assumptions to 1.69 mgd under high use (Bay Area Economics 1998a). An estimate of the baseline level of both domestic and irrigation water consumption was prepared for the Letterman Complex, using the same land use and consumption assumptions employed for the Presidio-wide analysis under high water use assumptions. Assumptions for this estimate include: office use of Letterman Complex (250 square feet per employee), consumption of 30 gallons of water per day per office employee, and 7.8 acres of irrigated landscaping using an average of 1,359 gallons per day per acre based on recent irrigation consumption

trends at the Presidio golf course. Given these assumptions, the baseline water consumption for the 23-acre site is estimated to be 89,000 gallons per day.

When domestic and irrigation water needs are combined with requirements for Lobos Creek instream flow, it is apparent that Lobos Creek will be unable to meet the Presidio demand of 1.69 mgd under high use assumptions, or the reduced demand of 1.1 mgd under low use assumptions and still maintain the 0.5 mgd minimum flow of water in Lobos Creek. The Presidio Trust is in the process of planning for contingency and access to additional sources of water (such as reclaimed water for irrigation water use within the park) as well as implementing domestic and irrigation water conservation measures to reduce the overall consumption of water at the Presidio to fit within available supply.

3.5.3 EXISTING PRESIDIO FIRE FLOW

The Presidio water supply and distribution system provides water for domestic and irrigation purposes as well as internal building sprinkler systems and fire hydrants for purposes of fire suppression. In addition, approximately 3.0 million gallons of the total 6.0 million gallons of water storage at the Presidio is reserved for fire flow. Fire flow is defined as the rate of the flow of water combined with the duration of flow or the supply of water reserved for fire emergencies. The Uniform Fire Code establishes the required volume and duration of fire flow that must be present within a certain distance of a structure according to the type of construction, size of the building, and other site layout conditions.

A report prepared for the GMPA EIS (Nolte and Associates 1991) identified deficiencies in the water distribution system that resulted in inadequate fire flow to the Letterman Complex. Since issuance of the report, improvements have been made to the water distribution system that have increased the fire flow available to the Letterman Complex. The Letterman Complex historically was served with water via an 8-inch line from the main reservoir. A second 10-inch line from the main reservoir was installed by the U.S. Army to address water system deficiencies. The combination of these two water lines provides adequate fire flow to the Letterman Complex in its current configuration (EQE Engineering and Design and Lee Engineering Enterprises 1992 and personal conversations with Chief Bill Oswald, Presidio Fire Department and Mr. Richard Hansen, Presidio Trust). Improvements to the water distribution system would be required to ensure adequate fire flow to new development with the Letterman Complex to meet the Uniform Fire Code.

3.6 Schools

According to the San Francisco Unified School District (SFUSD), 63,165 students were enrolled in city schools for the 1998-1999 school year (Table 3). As of March 1999, 18 schoolchildren resided in Presidio housing directly leased by the Presidio Trust; this figure does not include schoolchildren residing in Presidio housing occupied by Department of Defense personnel (this information was not available). According to the U.S. Department of Education, 844 dependants of Presidio military and civilian staff were enrolled in SFUSD schools in the 1990-1991 school year during U.S. Army occupancy of the Presidio. There were 63,624 students enrolled in SFUSD schools in 1991-1992 (a school year that is representative of U.S. Army occupancy of the Presidio for which data was readily available to the SFUSD), compared to the 1998-1999 enrollment of 63,165. The 1998-1999 figure represents a decrease of 459 students.

Table 3
1991–1992 and 1998–1999
Selected School Site Enrollment

SCHOOL[a]	ENROLLMENT 1991-1992	ENROLLMENT 1998-1999	CHANGE 1992 TO 1999
Alamo Elementary	681	700	19
Argonne Year Round Elementary	340	386	46
Cabrillo Elementary	392	350	-42
Golden Gate Elementary	505	386	-119
Lafayette Elementary	593	498	-95
Sherman Elementary	478	470	-8
Marina Middle	929	820	-109
Presidio Middle	1,136	1,141	5
Roosevelt Middle	836	824	-12
Galileo High	1,646	1,814	168
George Washington High	2,648	2,410	-238
John Swett Alternative	341	309	-32
Total	10,525	10,108	-417

Source: SFUSD; Bay Area Economics (BAE)

Note:
[a] SFUSD identified these school sites as ones that Presidio schoolchildren would likely attend.

Children living at the Presidio and enrolled in SFUSD schools primarily attend schools in the neighborhoods surrounding the Presidio, including the Richmond, Marina and Western Addition neighborhoods of San Francisco. In the past, many Presidio schoolchildren have attended private schools or attended certain SFUSD schools in other areas of San Francisco at the request of their parents. Schools in the city of San Francisco neighborhoods surrounding the Presidio have experienced a significant decline in enrollment in recent years, especially in the lower grades (personal communication with Margaret Wells, Program Director, Education Placement Center, SFUSD). Table 3 shows the schools in the neighborhoods of San Francisco that have traditionally accommodated Presidio schoolchildren. Enrollment in these schools has decreased by 417 students since 1991–1992.

The SFUSD operates the Presidio Child Development Center in building 387 in the Presidio Main Post. The center, one of 45 such centers operated by SFUSD city-wide, provides programs for infants and toddlers as well as pre-kindergarten programs for children ages 3 to 5. The Presidio Child Development Center also provides before- and after-school programs for kindergarten to fourth-grade children enrolled in Argonne, Cabrillo, Marina, John Swett and Sherman elementary schools. The Presidio Child Development Center does not provide elementary school classroom programs.

3.7 Housing

3.7.1 PRESIDIO RESIDENTIAL LEASING PROGRAM

The Presidio currently has 1,304 housing units (1,116 single-family and multi-family units and 188 units in buildings that formerly served as barracks). Under the Presidio Trust's residential leasing policy, rents for these housing units reflect market conditions. The Presidio Trust is working to have available units at a full range of rent levels so that a cross section of people who work at the Presidio can afford to live on the Presidio. Although some of the units have been rented temporarily to the general public, it is anticipated that Presidio-based employees and their families eventually will occupy all Presidio housing. The Presidio interim residential leasing program is intended to provide residences for up to 50 percent of the workers at tenant businesses and organizations. Achieving this goal would establish an important balance between jobs and housing, reduce automobile travel to and from the park, and help create a thriving community at the Presidio. Available housing also provides an incentive for organizations to locate at the Presidio, especially given the scarcity of housing in the Bay Area.

There is a shortage of housing for low- and moderate-income groups in the city of San Francisco. To increase the supply of affordable housing in the region, the Presidio Trust offers reduced rental rates to Presidio employee and tenant households with gross household incomes of less than $45,000.

3.7.2 PRESIDIO HOUSING REHABILITATION

The Presidio Trust is implementing a program to rehabilitate or repair, as necessary, a large number of housing units to be leased. Since this effort was initiated in the summer of 1998, more than 400 units have been made available for rent. These newly leased units, combined with units leased by NPS prior to Trust efforts, result in 590 occupied units under Trust management. Additionally, 180 units are under contract to the Department of Defense and are occupied by military personnel. Thus, as of early December 1999, 770 units were occupied at the Presidio.

3.7.3 BAY AREA VACANCY RATES AND HOUSING CONSTRUCTION

Vacancy rates within the Bay Area range from approximately 3.9 percent in Santa Clara County to 7.5 percent in San Francisco County (California Department of Finance 1998).[4] The total number of housing units in the Bay Area that were vacant in 1998 is estimated to be approximately 124,000.

[4] Note: The Department of Finance bases estimates of vacancy rate on the 1990 Census and other recent records such as utility billing records. Because Department of Finance estimates can include seasonal residences and boarded-up residences, they may overstate vacancy rates.

It is estimated that approximately 226,000 new housing units will be constructed in the San Francisco Bay Area between 2000 and 2010 (ABAG 1998). This represents an approximately 9 percent increase of new housing units over the existing supply. The distribution of these new housing units by Bay Area sub-region is as follows: 13,320 new units in San Francisco; 36,390 units in the North Bay; 106,820 new units in the East Bay; and 69,340 new units on the Peninsula.

3.8 Medical Research

Although the San Francisco Bay Area is home to a large number of bioscience[5] and medical research companies, relatively few are concentrated in San Francisco itself. As of 1998, approximately 500 bioscience companies were located in the Bay Area. Fifty-five percent of these companies are located in San Mateo and Santa Clara counties, 34 percent are located in the East Bay, and 11 percent are in the North Bay (which includes San Francisco) (Bay Area Bioscience Center 1998). Bioscience companies employ over 52,000 people in the Bay Area.

The presence of numerous research-focused universities has led to a regular exchange of technology between the public and private sector and the seeds for new start-up firms.

In San Francisco, the primary medical research employer UCSF. UCSF is developing its 43-acre Mission Bay Campus in San Francisco's southeast quadrant as a world center for biomedical/molecular research that could contain 25 buildings, with 2.65 million square feet of space for 9,000 scientists, graduate students, and staff. Following Regents' approval, UCSF broke ground in October 1999 and intends to occupy its first building in 2002. The large campuses of Chiron in Emeryville employ nearly 2,000 people and Genentech in South San Francisco employs more than 3,200 people. These two companies serve as the nuclei for the growing bioscience industry in the Bay Area. Competition between small bioscience companies for laboratory space is strong, with the vacancy rate for research and development space in South San Francisco below one percent.

At the Presidio, the U.S. Department of Agriculture (USDA) operated a human nutrition research facility in building 1110 in the Letterman Complex. In April 1999, the USDA vacated building 1110 and relocated its operations to a new facility in Davis, California.

The LAIR and LAMC recently have been used for medical care and research. Both buildings have been well maintained and are in generally good physical condition. However, the LAMC and LAIR are too large for small and start-up firms to occupy in an "as-is" condition, and both structures would be impractical to retrofit for modern medical research due to the unique layout and functional obsolescence of these structures. The NPS commissioned a study (Backen, Arrigone & Ross 1993) which identified possible deficiencies, including:

- A lack of suitable light and air within the laboratory and office spaces (LAIR);
- Complete separation of laboratory from office space into separate structures connected by a breezeway (LAIR);

[5] Bioscience is defined by the Bay Area Bioscience Center (BABC) as "encompass[ing] biotechnology and other advances in the life sciences, their commercial application, and related instrumentation, medical devices and software."

- Existing casework that does not meet current laboratory standards (LAIR);
- Non-compliance of structural system and interior architectural components to current seismic code requirements (LAMC);
- Deficient emergency exiting systems (LAMC);
- Lack of safety systems in high-rise structures (LAMC);
- Insufficient standard and emergency power systems (LAMC and LAIR);
- Limited capacity air conditioning systems that might be below code requirements (LAMC); and
- Inadequate bracing of mechanical equipment (LAMC).

Both the NPS and Presidio Trust have made good faith efforts to solicit proposals for the reuse of Letterman Complex facilities for medical research. In 1994, the NPS issued an RFQ for interested organizations that could demonstrate a capability to undertake all or a portion of the Letterman Complex buildings and grounds (all of LAIR or LAMC, or at least 50,000 square feet of other Letterman Complex facilities). A total of 16 responses was received by the NPS, two of which were selected for negotiations to lease space. Only one of the two finalists, UCSF, proposed to use the Letterman Complex for medical research–related activities. Due to an inability of the two parties to reach agreement on assumptions relating to project value and phasing, UCSF did not complete negotiations for the Letterman Complex with the NPS (see Section 1.1.7).

The Presidio Trust issued an RFQ in 1998 for a 23-acre site within the Letterman Complex that is the subject of this analysis. There were 18 responses to this RFQ, only one of which proposed to use a minor portion of the site for medical research-related activities (Goldman Institute). The USDA did not choose to participate in the Presidio Trust RFP process (see Section 2.1.1) for the purposes of maintaining its human nutrition research facility at the Letterman Complex.

Through its recent RFQ process and marketing efforts, the Presidio Trust encouraged creative proposals to provide modern medical research facilities at the site in furtherance of the GMPA's stated objective to "promote life and earth science research, emphasizing systems and methods to improve human health and the quality of the environment for future generations." No qualified medical research companies capable of undertaking a long-term lease expressed an interest in moving to the site, however. Thus, it appears that current market conditions do not indicate significant demand for medical research facilities at the Letterman Complex, regardless of whether existing structures or opportunities for new construction are offered.

3.9 Traffic and Transportation Systems

The existing transportation setting and conditions in the vicinity of the Letterman Complex are described below. Information for the description was obtained from the *Letterman Complex Transportation Technical Report* (Wilbur Smith Associates 1999).

3.9.1 REGIONAL AND LOCAL HIGHWAYS

The roadway network near the Letterman Complex consists of several main routes that connect to the rest of San Francisco. Intersections within the Presidio are controlled by either two-way or four-way stop signs. The key roadways in the vicinity of the Letterman Complex are described below.

U.S. Highway 101 becomes Doyle Drive, Richardson Avenue, and Lombard Street near the Presidio. Doyle Drive generally runs east-west through the northern portion of the Presidio before becoming Richardson Avenue in the eastern portion of the Presidio. Richardson Avenue runs diagonally from Doyle Drive until it merges with Lombard Street about two blocks east of the Presidio's eastern border. U.S. Highway 101 carries the majority of San Francisco's east-west through-traffic crossing the Presidio. Although it connects with most intersecting streets in the city, the only direct connections to Presidio roadways within the park are at the Golden Gate viewing area near the Golden Gate Bridge and at Gorgas Avenue (eastbound traffic only) near the intersection of Lyon Street and Richardson Avenue.

Lincoln Boulevard runs generally east-west near the vicinity of the Letterman Complex. It connects to Lombard Street and Presidio Boulevard at its eastern terminus and extends north-south along the west edge of the park. Lincoln Boulevard is generally 44 feet in width and contains one travel lane in each direction south of Letterman Drive and two lanes in each direction north of Letterman Drive to the Main Post, and then one lane in each direction west to El Camino Del Mar.

Presidio Boulevard connects to Lincoln Boulevard/Lombard Street near the Letterman Complex and continues north-south along the park's easterly edge. In the vicinity of the Letterman Complex, Presidio Boulevard is 33 feet in width, and contains one lane in each direction.

Gorgas Avenue provides east-west access on the north side of the Letterman Complex. It connects with U.S. Highway 101 and Lyon Street at an eastern gateway, and provides access to Crissy Field. West of General Kennedy Avenue, Gorgas Avenue is 50 feet wide, with one lane in each direction. Gorgas Avenue narrows to a width of 31 feet east of General Kennedy Avenue, with two eastbound lanes and one westbound lane.

Lombard Street runs east-west from its intersection with Lincoln Boulevard/Presidio Boulevard near the Letterman Complex and extends into San Francisco to the east. In the vicinity of the Letterman Complex, Lombard Street is generally 36 feet wide, with one lane in each direction.

Mason/Old Mason Streets provide east-west access through the Crissy Field area through the Marina Gate along the Presidio's north coast. Mason Street connects to Marina Boulevard and Doyle Drive at the Presidio's northwest gateway. At their western termini, these routes indirectly connect to Lincoln Boulevard by way of three minor roadways (Crissy Field Avenue, McDowell Avenue, and Cowles Street). Mason Street at the northeast gate is 58 feet in width, with two eastbound lanes and one westbound lane. This street is currently being reconstructed as part of restoration of Crissy Field.

3.9.2 CURRENT TRAFFIC CONDITIONS

Traffic enters and exits the Presidio through nine gates. Average daily traffic volumes (1998 conditions) are approximately 65,000 vehicles per day, with 20 percent of the traffic entering and exiting the Presidio via the Lombard Street Gate. A substantial portion of the existing traffic could be attributed to pass-through trips,

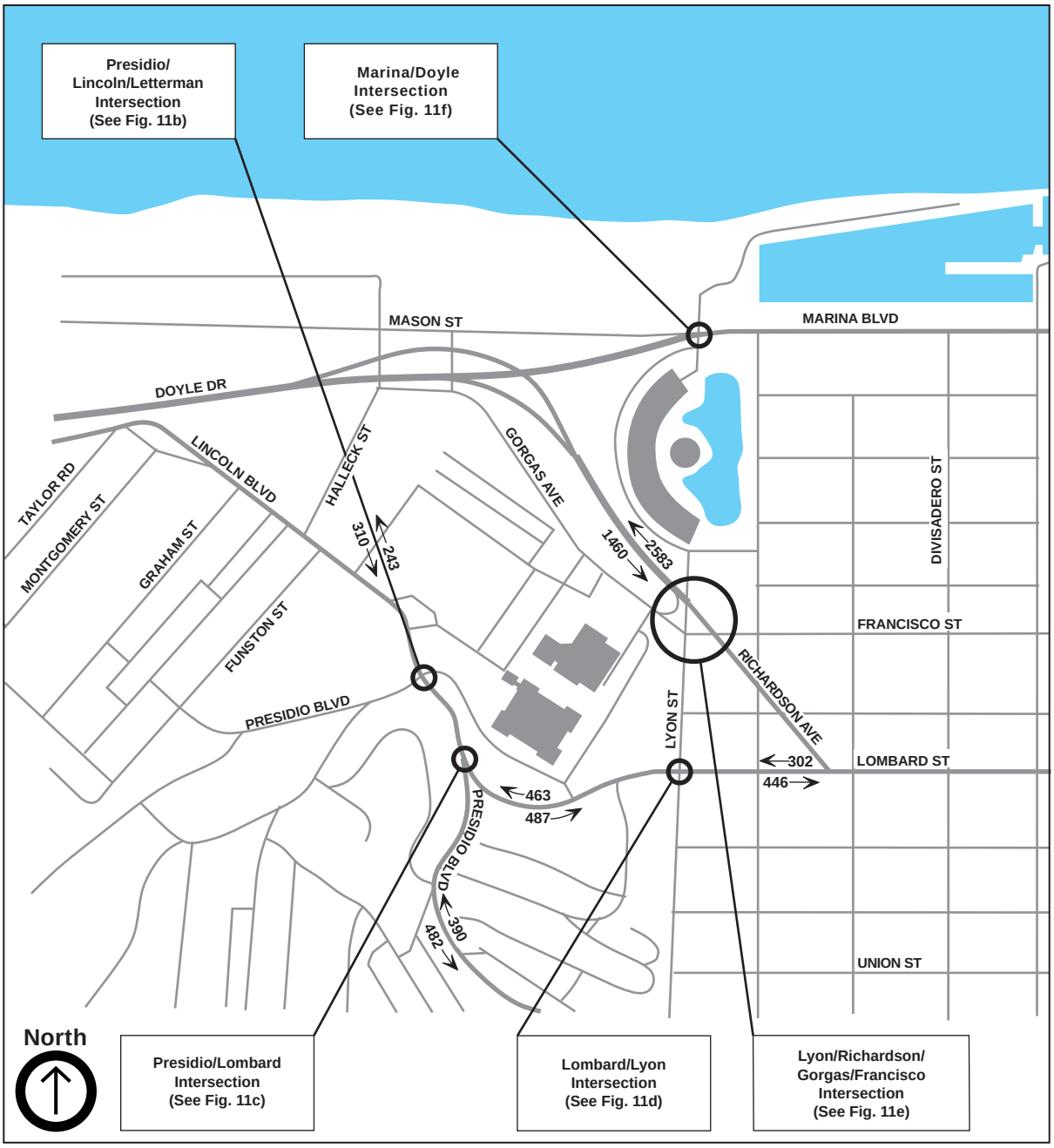
particularly between the Lombard Street and Presidio Boulevard gates. On weekdays, 40 to 50 percent of traffic volumes at the Lombard Street and Presidio Boulevard gates are pass-through trips. Weekday traffic volumes do not vary substantially by season, unlike weekend traffic, which is primarily recreational traffic.

Traffic counts conducted in 1998 at the Presidio gates indicate weekday traffic volumes ranging between 63,000 and 67,000 vehicles per day throughout the year, while weekend traffic ranged from 58,000 in the fall to 75,000 in the summer. Figures 11a through 11f present the p.m. peak-hour turning movement volumes for key intersections within the vicinity of the Letterman Complex. Intersection level of service (LOS) was calculated at five intersections using the methodology described in the *1994 Highway Capacity Manual* (Transportation Research Board 1994). The *Highway Capacity Manual* methodology calculates the average delay experienced by a vehicle traveling through an intersection, and assigns a corresponding LOS. The levels of service range from LOS A, indicating volumes below capacity with vehicles experiencing little or no delay, to LOS F, indicating volumes near capacity with vehicles experiencing extremely long delays. Table 4 presents the existing (1998) delay per vehicle and LOS for the key intersections for p.m. peak-hour conditions. All intersections operate at acceptable levels of service (above LOS D) during the p.m. peak hour.

3.9.3 PUBLIC TRANSPORTATION

Public transit systems serving the Presidio include the San Francisco Municipal Railway (MUNI) and Golden Gate Bridge, Highway and Transportation District (Golden Gate Transit). These services provide access to other regional carriers such as Bay Area Rapid Transit (BART), San Mateo Transit (SamTrans), and the regional ferries. In addition, private carriers accommodate specific needs not provided by the public systems.

MUNI provides scheduled service within or adjacent to the Presidio on seven lines (Figure 12). The 28-19th Avenue, 29-Sunset, 43-Masonic, and 82X-Levi Plaza Express lines provide service directly into/through the Presidio, while the 41-Union and 45-Union-Stockton lines provide service to the corner of Greenwich and Lyon streets just outside the Lombard Street Gate. In addition to these weekday services, the 76-Marin Headlands line is a Sunday- and holiday-only service that runs from downtown, stops at the intersection of Richardson Avenue and Francisco Street and the Golden Gate Bridge Toll Plaza, and then continues north to the Marin Headlands. The 30-Stockton and 30X-Marina Express lines travel on Chestnut Street, but do not extend west of Broderick Street. The Letterman Complex has the most extensive transit service in the park with convenient stops for the 29-Sunset, 43-Masonic, and 82X-Levi Plaza Express lines on Letterman Drive, the 28-19th Avenue line at Richardson Avenue and Francisco Street, at the northeastern edge of the Letterman Complex, and stops for the 41-Union and 45-Union-Stockton lines at the corner of Greenwich and Lyon streets just outside the Lombard Street Gate.



See Figures 11b-11f

Figure 11a.
Weekday PM Peak-Hour
Existing Roadway Segment and
Intersection Volumes

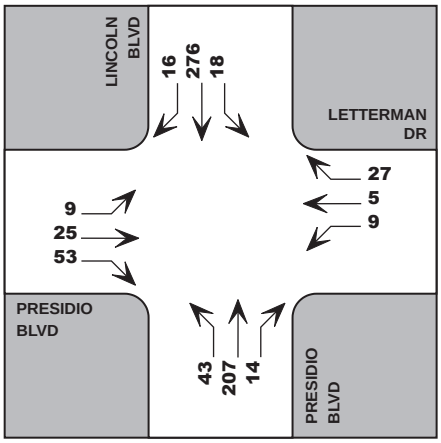


Figure 11b.
Presidio/Lincoln/Letterman Intersection

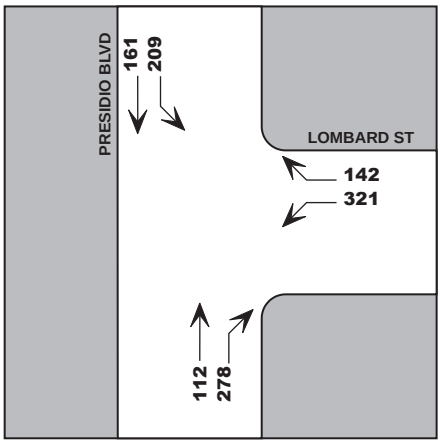


Figure 11c.
Presidio/Lombard Intersection

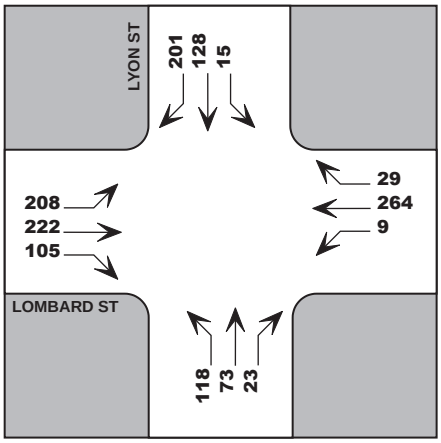


Figure 11d.
Lombard/Lyon Intersection

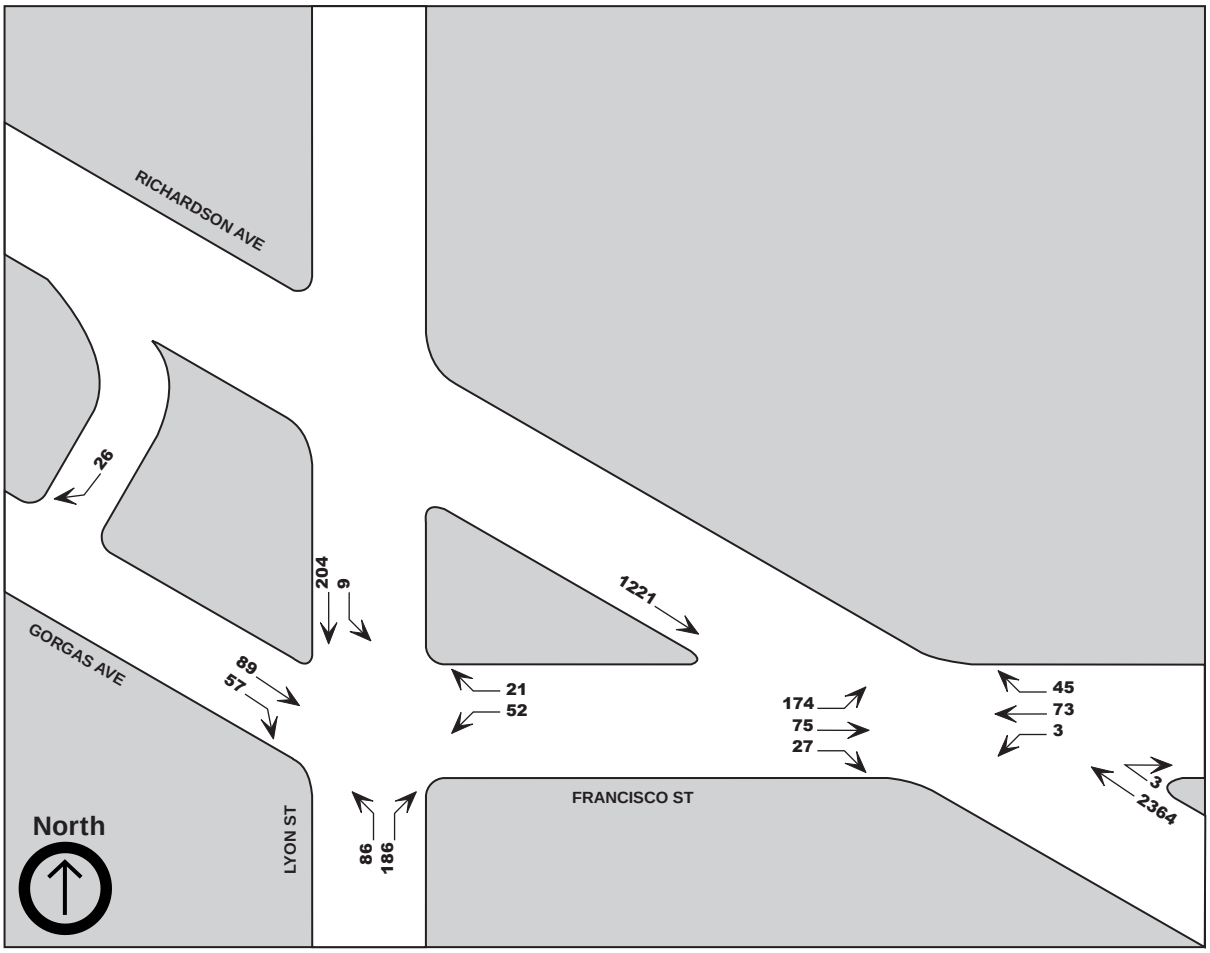


Figure 11e.
Lyon/Richardson/Gorgas/Francisco Intersection

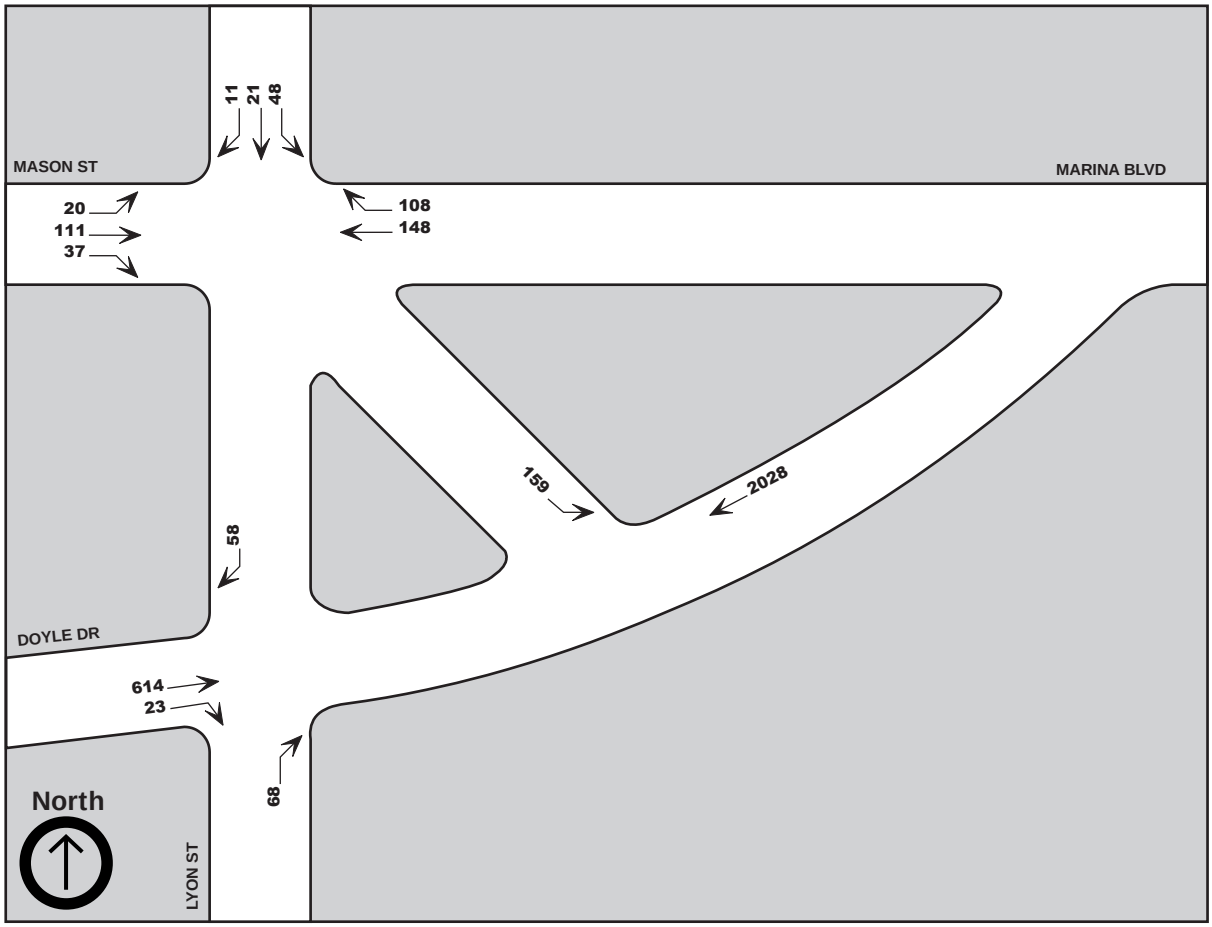


Figure 11f.
Marina Boulevard/Doyle Drive Intersection

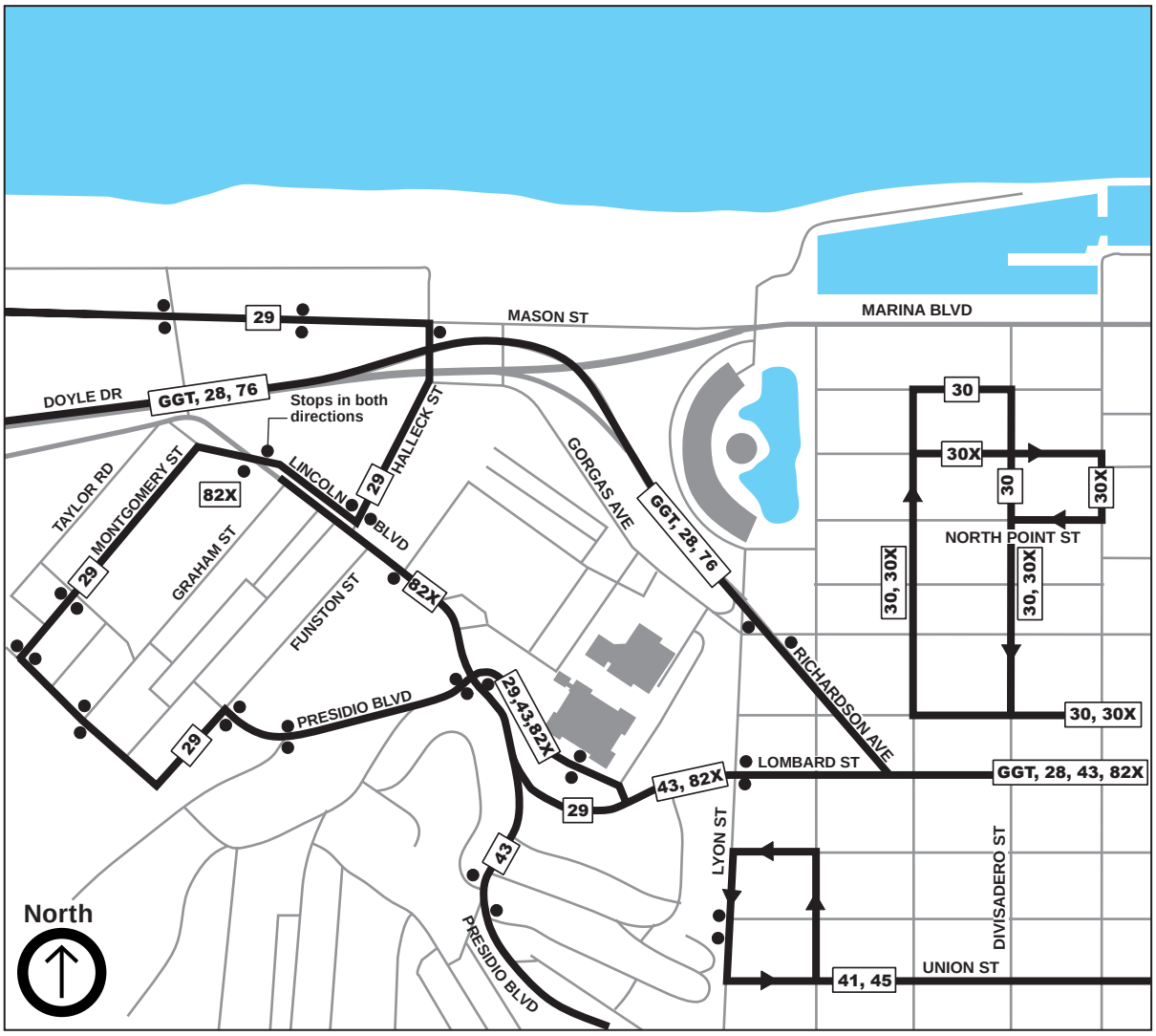


Figure 12.
Existing Transit Service

● Bus stop location

30 Numbered lines indicate MUNI bus service
GGT GGT lines indicate Golden Gate Transit bus service

Table 4
Intersection Level of Service Operating Conditions:
Existing p.m. Peak-Hour Conditions

INTERSECTION	CONTROL DEVICE	AVERAGE INTERSECTION DELAY (SECONDS PER VEHICLE)	LOS[a] OF WORST APPROACH	CRITICAL VOLUME/ CAPACITY
Francisco/Gorgas/Lyon	3-way STOP[b]	3.5	B	NA
Richardson/Francisco	Signal	9.2	B	0.84
Lombard/Lyon	All-way STOP	20.0	C	0.98
Presidio/Lombard	All-way STOP	12.5	C	1.26
Presidio/Letterman/Lincoln	All-way STOP	3.6	A	1.06
Mason/Marina/Lyon	One-way STOP[c]	1.0	B	NA
Doyle/Marina/Lyon	signal	5.8	B	0.94

Source: Wilbur Smith Associates

Notes:

For unsignalized intersections, average delay per vehicle is presented for overall intersection operations; however, LOS is presented for the approach which operates with the greatest average delay per vehicle.

[a] LOS A: Insignificant Delays. Progression is extremely favorable, and most vehicles arrive during the green phase. Most vehicles do not stop at all.
LOS B: Minimal Delays. Generally good progression, short cycle lengths, or both. More vehicles stop than with LOS A, causing higher levels of average delay. Drivers begin to feel restricted.
LOS C: Acceptable Delays. Fair progression, longer cycle lengths, or both. Individual cycle failures may begin to appear, though many still pass through the intersection without stopping. Most drivers feel somewhat restricted.
[b] Three of four approaches stop. The Lyon Street approach does not stop.
[c] Of the three approaches, only the Lyon Street approach stops.

Golden Gate Transit operates bus lines and ferry routes between San Francisco and counties in the Golden Gate corridor of Marin and Sonoma counties. Twenty-six of their bus lines pass through the Presidio, stopping at the Golden Gate Bridge Toll Plaza. All lines but one proceed into San Francisco on U.S. Highway 101, with a stop at the corner of Richardson Avenue and Francisco Street (just northeast of the Letterman Complex).

On a typical summer weekday, 180 non-MUNI tour buses carry visitors to and from Presidio attractions such as the Golden Gate Bridge Toll Plaza, Fort Point and the Presidio Army Museum on the Main Post. They also stop at several scenic overlooks along the 49-mile drive (Presidio Trust 1998f).

In addition to regular bus service and ferry service, the Golden Gate Transit also operates a Club Bus service between UCSF's Parnassus Heights campus and Marin County, between Sonoma County and downtown San Francisco, and between Napa Valley and downtown San Francisco. The UCSF Club Bus service includes six routes, each with one daily round trip, serving Ignacio, Santa Rosa, San Rafael, Fairfax, Tiburon, and Rohnert Park. The Valley of the Moon commute service for Sonoma County includes three routes, each with one daily round trip. All three of the Valley of the Moon routes stop at the existing bus stop at the intersection of Richardson Avenue and Francisco Street during both the a.m. and p.m. peak periods. The Napa Valley Commute Club operates two routes, each with one daily round trip.

3.9.4 BICYCLE AND PEDESTRIAN TRAILS

The Presidio, including the Letterman Complex, does not have a continuous system of sidewalks, designated bicycle trails, and designated bicycle lanes. Sidewalks and marked pedestrian crossings are sporadic throughout the Presidio. In many cases within the Letterman Complex, pedestrians and bicyclists must mix with vehicles on the street system to move from one area to another.

Within the Letterman Complex, sidewalks are provided adjacent to buildings such as the LAMC, the YMCA pool and gym, and the Thoreau Center for Sustainability. Most intersections within the Letterman Complex do not have marked pedestrian crossings. The unsignalized intersection of Lombard Street/Presidio Boulevard, which provides a connection to the rest of the Presidio, has pedestrian crosswalks on all four approaches. Sidewalks are provided along Lincoln Boulevard and Lombard Street.

Because the Letterman Complex is only partly occupied, relatively few pedestrians are present within the area throughout the day. At the intersection of Presidio Boulevard/Letterman Drive/Lincoln Boulevard, a total of 55 pedestrian movements were observed on the four crosswalks (note that more than one movement could be attributed to a single pedestrian) during the p.m. peak hour. However, pedestrian activity is greater near the YMCA pool and gym.

In the vicinity of the Letterman Complex, Lombard Street, Presidio Boulevard, Halleck Street and Old Mason Street are part of the city's Bicycle Program (bicycle routes 4, 55, and 2). These routes are Class III facilities (signed route only; bicyclists share roadway with vehicles), with the exception of bike route 4 on Lyon Street between Francisco and Lombard streets. In addition, a bicycle lane is provided along the west curb of Halleck Street, between Young Street and Lincoln Boulevard.

The Presidio is a popular location for recreational bicycling, particularly on weekends. At the intersection of Presidio Boulevard/Letterman Drive/Lincoln Boulevard, 20 bicyclists were observed during the weekday p.m. peak hour (it should be noted that these counts were taken in January and would be much higher during non-winter seasons). The Letterman Complex is easily accessed from bicycle routes. The San Francisco Bicycle Plan (Wilbur Smith and Associates 1997) includes routes within the Presidio on Lombard Street, Presidio Boulevard, Halleck Street, Old Mason Street, and Lincoln Boulevard, and adjacent to the Presidio on Lyon Street and Marina Boulevard. All of the routes in the immediate vicinity of the Letterman Complex within the Presidio are signed routes without delineated bike lanes.

3.9.5 PARKING FACILITIES

There are 1,465 off-street and 88 on-street parking spaces within the 60-acre Letterman Complex. Parking is available in surface lots, unpaved open areas, and along the curbs. No parking structures are located within the complex. Currently 578 off-street parking spaces and 11 on-street parking spaces are within the 23-acre site, which comprises 38 percent of the total parking supply in the 60-acre Letterman Complex.

3.10 Cultural Resources

3.10.1 NATIONAL HISTORIC LANDMARK DISTRICT

The Presidio of San Francisco was designated a National Historic Landmark in 1962. It was recognized as a significant Spanish colonial military settlement and as a major U.S. Army post from 1846 to 1994. The only historic property identified in 1962 was the officers' club (building 50); no inventory of contributing properties was prepared. In 1970, the Sixth Army and the NPS agreed that the entire military reservation was within the landmark boundary. The Presidio was seen as a district of sites, buildings, structures, and objects.

In 1985, the NPS and the Department of the Army conducted an Historic American Building Survey Inventory of the Presidio of San Francisco. The goal of the project was "to provide technical assistance to the Army facilities engineers who are responsible for maintaining and protecting this landmark property."

In 1993, an update of the initial 1962 landmark form was completed by the NPS (1993b). The updated form established the boundaries of the landmark district as coinciding with the boundaries of the Presidio of San Francisco. It identified 662 building sites, structures and objects related to the full spectrum of military history as contributing to the National Historic Landmark district. As contributing properties to a National Historic Landmark district, these properties were also listed on the National Register of Historic Places. Many of these structures, such as the Presidio Gate and wall, contribute to the cultural landscapes of the Presidio.

Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to "take into account the effect" of a project like new construction at the Letterman Complex, and to provide the Advisory Council on Historic Preservation (ACHP) a "reasonable opportunity to comment with regard to" such a project. The ACHP has issued regulations appearing in 36 CFR Part 800 that detail how an agency such as the Trust may comply with the mandate of Section 106. Under Section 800.14 of the regulations, the Trust has initiated the consultation process through a Programmatic Agreement that envisions involvement of the State Historic Preservation Office, ACHP and NPS throughout the process of developing design guidelines, conceptual design documents and schematic design documents. Also provided for in the Programmatic Agreement are significant roles for these entities in the construction monitoring and the change order process. The Programmatic Agreement additionally contains, among other things, opportunity for public input, methodologies for addressing archeological properties, discoveries and unforeseen effects, and a requirement of mandatory notification to the Secretary of the Interior and invitation for the Secretary to participate in consultation where there may be an adverse effect on historic properties.

Section 110 of the NHPA sets out the broad historic preservation responsibilities of federal agencies to ensure that historic preservation is fully integrated into ongoing programs. Under Section 110(f), special protection is to be afforded to National Historic Landmarks. Under that provision a federal agency must, "to the maximum

extent possible, undertake such planning and actions as may be necessary to minimize harm" to a National Historic Landmark that may be directly and adversely affected by an undertaking such as the proposed project.

3.10.2 CONTRIBUTING HISTORIC PROPERTIES

Both contributing historic buildings and non-contributing buildings to the National Historic Landmark are located within the 60-acre Letterman Complex. The complex also includes historic site features, such as the two tennis courts on Gorgas Avenue, archeological sites, and historic road corridors. No historic buildings are located within the 23-acre site. Tables 5 and 6 list the contributing historic features within the Letterman Complex.

Table 5
Contributing Historic Buildings

BUILDING NUMBER	DATE CONSTRUCTED	BUILDING NUMBER	DATE CONSTRUCTED
558 leasing office/information center	1920	*1055 garage	1938
559 comfort station	1940	1056 storage building	1910
1000 office	1902	1059 combustibles storage building	1915
1001 office	1902	1060 medical supply warehouse	1916
1002 office	1908	1061 storage shed	1938
1003 office	1908	1062 medical supply warehouse	1922
1004 office	1908	1063 medical supply warehouse	1941
1007 office	1901	1076 garage	1938
1008 office	1931	1151 indoor swimming pool	1945
1009 office	1930	1152 gymnasium	1945
1012 office	1931	1160 warehouse	1940
1013 office	1933	1161 warehouse	1919
1014 office	1924	1162 warehouse	1919
1016 office	1899	1163 warehouse with office	1919
1040 powerhouse	1900	1167 warehouse	1919
1047 laundry	1914	1169 warehouse	1919
1050 psychiatric ward	1918	1170 warehouse	1919
1051 detention ward	1909		

*Building 1055 was extensively damaged by fire in 1999 and is slated to be demolished.

Table 6
Contributing Historic Site Features

FEATURE	DATE CONSTRUCTED	FEATURE	DATE CONSTRUCTED
1052 tennis court (structure)	1941	2063 Girard Road corridor	1902
1147 tennis court (structure)	1945	2086 Kendall Street corridor	1941
2024 Birmingham Road corridor	1941	2132 O'Reilly Avenue corridor	1912
2049 Edie Road corridor	1902	2179 Thornburg Road corridor	1912
2059 General Kennedy Avenue corridor	1902	2180 Torney Avenue corridor	1911
2064 Gorgas Avenue corridor	1920		

Source: NPS 1993a

The adjacent Palace of Fine Arts is a local San Francisco landmark (Landmark 88) but has a 2s2 listing in the California Historical Resources computerized inventory of properties statewide. According to the California State Historic Preservation Officer, the building has been determined ineligible for listing on the National Register of Historic Places because it is a 1967 reconstruction of the original Panama Pacific International Exposition structure. The Area of Potential Effects (APE) for the proposed project is defined as the entire 60-acre Letterman Complex in addition to the adjacent Palace of Fine Arts.

The following structures are not located within the Letterman Complex but are adjacent contributing historic structures to the National Historic Landmark district within the APE:

- Structure 575 Lombard Street Gate (c. 1896)
- Presidio wall (c. 1896)

3.10.3 NON-CONTRIBUTING PROPERTIES

The existing LAMC, constructed in 1969 and the LAIR, constructed in 1974 were constructed outside of the period of significance for the Presidio, and are considered non-contributing to the National Historic Landmark. They were designed and sited in such a way as to be insensitive to the adjacent historic hospital complex. In scale, massing, and materials, these facilities do not relate to the adjacent complex or to previous building layouts on the site; but instead, are an independent group of buildings that relate only to each other. The designers of LAMC and LAIR employed a modernist sensibility toward site planning and architectural design, resulting in buildings that contrast strongly with the surrounding Presidio buildings and landscapes. By grouping the buildings at the center of the 23-acre site and allocating so much of the site to paved parking lots (the parking lot east of LAMC/LAIR occupies more than 8 acres), the structures were separated from the

surrounding residential neighborhood and the rest of the Letterman Complex. LAMC, a seven-story tower sitting atop a wide three-story base, is the tallest building on the Presidio at 130 feet. In both height and bulk, this building is out of scale with the historic structures in the Letterman Complex and elsewhere in the Presidio.

3.10.4 CULTURAL LANDSCAPE

The interaction of people and place over time creates a cultural landscape, which is made up of components such as topography, vegetation, structures, circulation networks, land use patterns, building clusters, and small-scale features. Cultural values are reflected through development. The Letterman Complex's cultural landscape provides a means for understanding individual features, such as buildings and roads, within a larger context or setting, and for determining a level of sensitivity to change for that area. The cultural landscape analysis for the Letterman Complex is provided in Appendix B, Planning Guidelines. Very few features of the historic cultural landscape remain today on the 23-acre site, because considerable changes were made to the site at the time of the realignment of Lombard Street in the 1950s and the construction of LAMC, and later, LAIR. The remaining features from the historic cultural landscape area are:

- The Presidio wall, including the gate at Lombard Street.
- The planted windrow at the Lyon Street border, consisting primarily of eucalyptus trees.
- The gradual slope of the topography from south to north.
- A group of trees north of Lombard Street and east of Letterman Drive, which is a remnant of the original layout of Lombard Street prior to its realignment, consisting of palms and eucalyptus.
- The tennis courts located near Gorgas Avenue (structures 1052 and 1147).
- The scenic views to the north which focus on the Palace of Fine Arts, and east/west view corridors from Thornburg, Edie and Torney streets (features 2179, 2059, and 2180), which provide scenic views of San Francisco neighborhoods.

The following feature is not part of the 23-acre site, but is directly related to it and within the APE:

- The section of road in front of building 558 which connects to Presidio Boulevard. This is a remnant of the original alignment of Lombard Street.

3.10.5 ARCHEOLOGICAL RESOURCES

An initial Archeological Management Assessment has been conducted for the 60-acre Letterman Complex (NPS 1999b). The Archeological Management Assessment identified four archeologically sensitive zones that may contain features or sites which would either contribute to the National Historic Landmark district or be individually eligible for listing on the National Register of Historic Places. These zones are:

- PAS-2. *Presidio Marsh Archeological Sensitivity Area* – This is an area identified as potentially containing prehistoric sites along the edge of the bluff and the shoreline of the old marshland extending along the bay front of the Presidio and sweeping southward into the northern portions of the Letterman Complex. Historic refuse features may also exist in this zone.

- PAF-30. *The Presidio House* – The Presidio House was a public hostelry on the eastern boundary of the Presidio just inside and to the north of the Lombard Street Gate vicinity. The site may have existed in this area of the Letterman Complex between 1866 and 1915.
- PAF-51. *Earthquake Relief Camp 1 and Hot Meal Kitchen* – One of four relief camps established in the Presidio following the earthquake of April 18, 1906, Camp 1 contained up to 1,400 people along with a central hot meal kitchen area.
- PAF-56. *Spring Valley Water Company Flume/Pipeline* – In operation roughly between 1857 and 1890, this water system provided water to San Francisco from Lobos Creek along the Baker Beach Bluffs through Fort Point and along the Presidio Marsh Bluffs through the Letterman Complex area.

3.10.6 VISITOR EXPERIENCE

As a unit of the national park system, the Presidio receives millions of visitors annually. As provided in the Presidio Trust Act, the NPS is responsible for providing interpretive services, visitor orientation, and educational programs at the Presidio in cooperation with the Presidio Trust. The interpretive program and several visitor facilities are currently in place at the Presidio. The William Penn Mott Jr. Visitor Center, located in building 102 at the Main Post, is the principal location within the Presidio for visitor orientation and information and will include exhibits about the history of the Presidio and its many resources. Satellite facilities, such as the Crissy Field Environmental Center, and the interpretive display at the U.S. Park Police stables, will provide additional interpretive and educational opportunities for visitors. The GMPA identifies five interpretive themes as guiding principles for developing exhibits, waysides, and visitor programs. These themes are:

1. As one of the oldest continually used military posts in the United States, the Presidio is of rare historical significance.

2. The Presidio's cultural landscape represents an evolution of physical development influenced by the site's geography, local and national events, changing social values, and technological advances.

3. In a world of diminishing biological diversity, the Presidio represents an island of refuge in an urban environment and provides an opportunity to foster awareness of the importance of species diversity and the value of open space.

4. The Golden Gate, anchored by the Presidio, became a cultural crossroads and a gateway to immigration and settlement of the West Coast.

5. The Presidio has a long history of managed park and recreational settings, from the post's forested reserve conceived in the 1880s to its conversion into a national park unit.

The theme of technological advances would be featured prominently at the Letterman Complex as its history of medical research and technological innovations are interpreted for visitors.

3.10.7 VISUAL RESOURCES

The 23-acre site within the Letterman Complex has very low scenic quality and contains little evidence of its historic appearance. For the Letterman Complex, World War II was its busiest, most important historical period and a time when the hospital building complex reached its maximum site coverage. Both east and west portions

of the Letterman Complex contained buildings of similar scale and materials. The Letterman Complex was a well-integrated ensemble of buildings which included circulation elements and view corridors that tied the 60-acre complex together. When LAMC and LAIR were constructed on the site of the former East Hospital, they blocked or compromised existing historic view corridors and effectively cut the site into two portions. In terms of height, scale, massing and materials, they contrast sharply with the surrounding historic setting.

The existing 10-story LAMC building and the three-story LAIR facility are located in the middle of the eastern portion, a 23-acre site surrounded by parking lots on the east and north sides. The eastern parking lot consists of approximately 8 acres of paved parking surface. One's view west into the site from the Lombard Street Gate or from the Presidio wall consists of a foreground of parking lot terminated by LAMC and LAIR, with the 10-story LAMC tower dominating views from most directions. Views into the site from the Gorgas Avenue Gate also consist of parking lot views terminated by the blank east elevation of the LAIR facility. North-facing views toward the Palace of Fine Arts, which forms a significant visual resource for this part of the Presidio, are possible from the eastern parking lot, but are blocked by the 10-story LAMC building when one is on Letterman Drive or Lombard Street. Views from the historic structures on O'Reilly Avenue, which forms the edge of the historic hospital complex, are dominated by the LAMC and LAIR facilities and do not continue into the center of the 23-acre site. Two historic view corridors are present on the existing site at Edie and Thornburg roads. Refer to Figure 13 for images of the views described at the existing site. These two buildings are also visible from the residential neighborhoods outside the Presidio boundary, with the LAMC tower forming a highly visible object on the local area's skyline.

3.11 Air Quality

3.11.1 AMBIENT AIR QUALITY STANDARDS

Based on the authority of the federal Clean Air Act as amended, and the California Clean Air Act as amended, federal and state regulatory agencies set upper limits on the airborne concentrations of six criteria pollutants: ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter, and lead. Particulate matter is regulated as inhalable particulate matter less than 10 microns in diameter (PM_{10}), and fine particulate matter less than 2.5 microns in diameter ($PM_{2.5}$). Ozone is a secondary pollutant formed by the reactions of nitrogen oxides (NO_x) and reactive organic gases (ROG).

The federal and state standards for these pollutants are summarized in Table 7. Such upper limits or "ambient air quality standards" are designed to protect all segments of the population including those most susceptible to the pollutants' adverse effects (e.g., the very young, the elderly, people weak from illness or disease or persons doing heavy work or exercise).

Both the federal Clean Air Act and the California Clean Air Act require designation of nonattainment status for areas of the state where federal or state ambient air quality standards are not met. The nine-county San Francisco Bay Area Air Basin has a history of recorded violations of federal and state ambient air quality standards for ozone, CO and PM_{10}. Since the early 1970s, substantial progress has been made toward controlling these pollutants and the area has attained all state and federal standards except those for ozone and

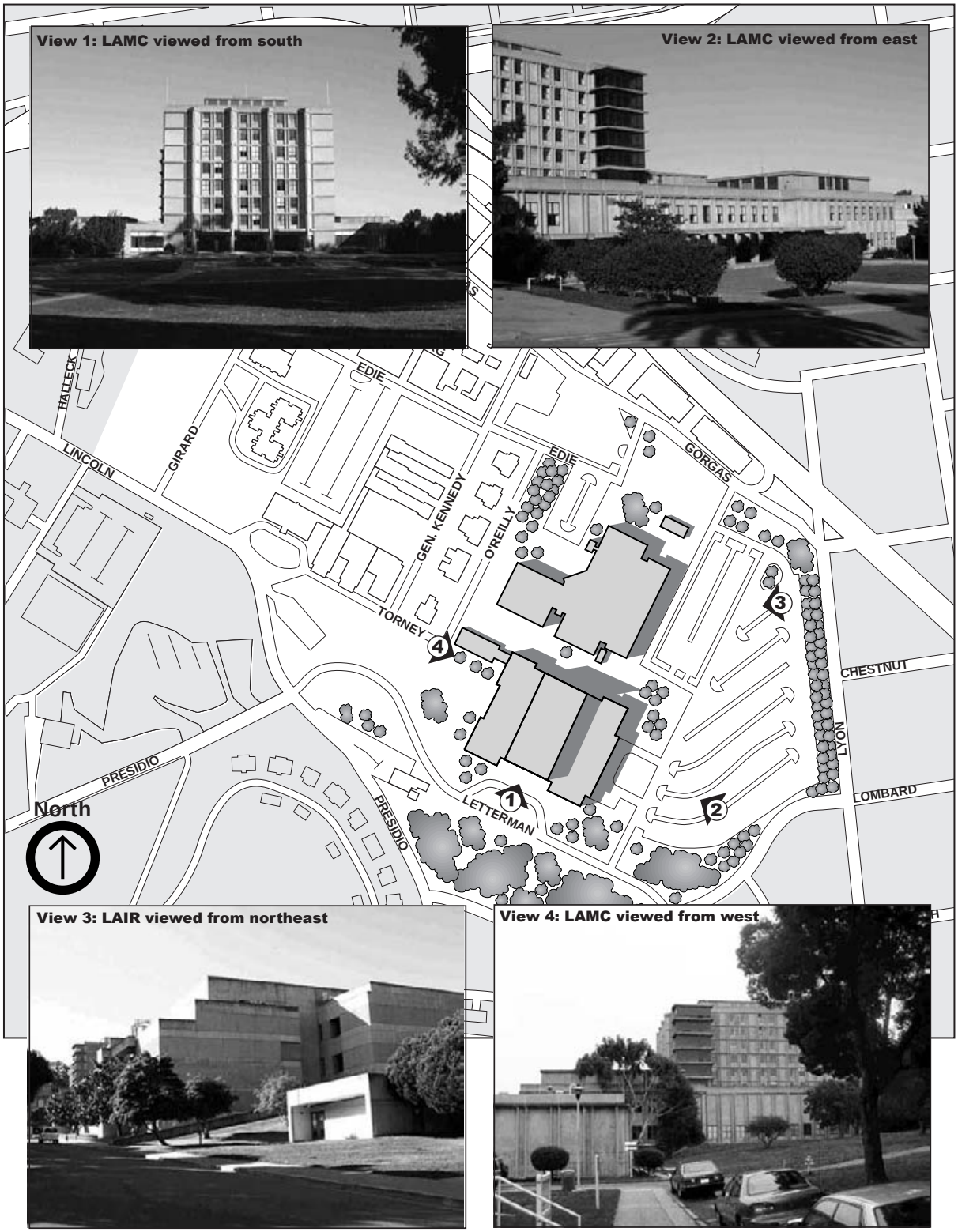


Figure 13.
Views of Existing LAMC/LAIR

Table 7
Federal and State Air Quality Standards

POLLUTANT	AVERAGING TIME	CALIFORNIA STANDARD[a]	FEDERAL STANDARD[b]
Ozone	1-hour	0.09 ppm	0.12 ppm
	8-hour	X	0.08 ppm
Carbon Monoxide (CO)	1-hour	20.00 ppm	35.00 ppm
	8-hour	9.00 ppm	9.00 ppm
Nitrogen Dioxide (NO_2)	1-hour	0.25 ppm	X
	Annual Average	X	0.053 ppm
Sulfur Dioxide (SO_2)	1-hour	0.25 ppm	X
	3-hour	X	0.5 ppm
	24-hour	0.04 ppm	0.14 ppm
	Annual Average	X	0.03 ppm
Particulate Matter (PM_{10})	24-hour	50 µg/m^3	150 µg/m^3
	Annual Geometric Mean	30 µg/m^3	X
	Annual Arithmetic Mean	X	50 µg/m^3
Fine Particulate Matter ($PM_{2.5}$)	24-hour	X	65 µg/m^3
	Annual Arithmetic Mean	X	15 µg/m^3
Lead	30-day Average	1.5 µg/m^3	X
	Calendar Quarter	X	1.5 µg/m^3

Source: California Air Resources Board 1997

Notes:
µg/m^3 = micrograms per cubic meter
ppm = parts per million by volume
X = No standard exists for this category
[a] California standards for ozone, carbon monoxide, sulfur dioxide, nitrogen dioxide, and particulate matter (PM_{10}) are values that are not to be exceeded.
[b] The form of the federal standards (i.e., how the standard is applied) varies from pollutant to pollutant. 40 CFR Part 50 includes the relevant form for each federal standard.

PM_{10}. For ozone, the Bay Area is a federal (moderate) nonattainment area and a state-level nonattainment area. For PM_{10}, the Bay Area does not meet the state standard, but does meet the federal standard. The area meets all standards for CO.

Toxic air contaminants, which may have the potential to cause cancer or may pose a present or potential hazard to human health, are also regulated through federal, state, and local programs. Unlike criteria pollutants, there are no regional ambient standards for toxic air contaminants. This is primarily due to the localized nature of the adverse health impacts caused by toxic air contaminant emissions. Mobile sources are not directly regulated as

sources of toxic air contaminants, except for lead. Indirect control of toxic air contaminants from mobile sources, including lead, is generally achieved through fuel efficiency standards and reformulation of fuels. Stationary source categories are typically regulated by toxic air contaminant emission standards found in either federal or district-level rules.

3.11.2 AIR QUALITY MANAGEMENT PLANS

State Implementation Plan and the Clean Air Plan – The federal Clean Air Act, as amended, and the California Clean Air Act are the primary drivers for attaining and maintaining ambient air standards. The federal act contains conformity provisions that help to ensure that specific plans and projects throughout the region do not produce more emissions than are allowed by local air quality plans. These laws also provide the basis for implementing agencies to develop mobile and stationary source performance standards.

The Bay Area Air Quality Management District (BAAQMD) is the primary agency responsible for planning, implementing, and enforcing the federal and state ambient standards in the Bay Area. The BAAQMD's planning efforts to attain and maintain the standards are contained within two basic plans. The State Implementation Plan (SIP) and the Clean Air Plan specify the means of maintaining the federal and state standards, respectively.

The federally required SIP was revised during 1999 because of recent exceedances of the federal ozone standard. The SIP is a compilation of plans and regulations that govern how the region and state will comply with the federal Clean Air Act requirements to attain and maintain the ozone standard. Along with the BAAQMD, the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments will also contribute to the SIP.

Under Section 176(c) of the federal Clean Air Act, federal actions in nonattainment areas or maintenance areas must conform to applicable implementation plans approved under the Clean Air Act. A formal conformity determination is required for federal actions when the total direct and indirect emissions of nonattainment pollutants from a proposed project exceed specified thresholds. The BAAQMD is currently required to comply with the federal requirements associated with ozone "unclassifiable" nonattainment areas and CO maintenance areas. The emission thresholds for general (non-transportation–related) federal actions are set forth in 40 CFR 51.853. The thresholds for general federal actions in the Bay Area are 100 tons per year of ROG, 100 tons per year of NO_x and 100 tons per year of CO. Federal actions with emission levels below these thresholds are presumed to conform with the SIP (see discussion in Section 5.4.2).

Because the Presidio is part of the GGNRA, the area is designated as a Class II area within the federal Clean Air Act and amendments. As compared to a Class III designation, the federal Class II designation provides additional protection by reducing the allowable increases in pollutant concentrations that may occur. The Clean Air Act requires federal land managers to protect a park's air quality values from adverse impacts. Section 118 of the Clean Air Act requires that federal facilities comply with existing federal, state, and local air pollution control laws and regulations. The Presidio Trust must ensure that activities within its administrative jurisdiction meet existing laws and regulations and that external sources of air pollution are controlled or mitigated to the extent possible to protect air quality and resource values.

The Clean Air Plan is a state-level requirement of the California Clean Air Act. The BAAQMD's 1997 Clean Air Plan specifies the means of how the region will meet the state ozone standard. This plan is required to be updated and reevaluated every three years, with the next update due in 2000. The state PM_{10} standards are also exceeded in the region. However, no state plan is required to meet state PM_{10} standards.

Clean Transportation Zone – A "Clean Transportation Zone" resolution was established in 1994 between the Departments of the Interior, Energy, Army and Transportation, as well as the General Services Administration. The resolution formalized a collaboration among these departments to "showcase current and advanced, energy-efficient/renewable transportation technologies . . . , to reduce petroleum-based fuel use . . . , and to establish an environment for the growth and use of alternative fuels and alternative fueled vehicles."

San Francisco General Plan – Local environmental plans and policies also recognize community goals for air quality. The *San Francisco General Plan* (City and County of San Francisco n.d.) includes the 1997 Air Quality Element. Objectives include reducing traffic-related emissions, coordinating land use, and reducing road and construction-related dust. Because the Presidio is under exclusive federal jurisdiction, it is not subject to state and local land use plans and policies. However, it is the policy of the Presidio Trust to consult with the city to achieve consistency wherever possible.

3.11.3 CLIMATE AND METEOROLOGY

The Bay Area's regional meteorological conditions are dominated by the semi-permanent high pressure area in the eastern Pacific Ocean, which is in large part responsible for the cool, dry summers and mild, moderately wet winters. This pressure system is also responsible for the daytime sea breeze that tends to provide fresh air to the Bay Area. The sea breeze is a prevailing wind from the west and northwest that is directly responsible for providing the Presidio area with superior-quality fresh air from the Pacific Ocean. These winds tend to provide the cool and windy climate and reduce pollution potential in San Francisco by carrying pollutants eastward towards the bay. Pollution potential is higher in the sheltered valleys throughout the region and in the climatological subregions that are not directly affected by the marine air entering through the Golden Gate (BAAQMD 1996).

Temperatures in San Francisco are moderated by marine air and proximity to the ocean and bay. Average summertime highs are generally in the 60s to mid-70s Fahrenheit, and in the winter, average lows are in the 40s (NOAA-CIRES 1990).

3.11.4 REGIONAL AIR QUALITY CONDITIONS

The California Air Resources Board compiles inventories and projections of emissions for the Bay Area. The projections show the planned reductions in emissions of ozone precursors expected to bring the area into attainment. Projected substantial reductions in CO emissions from 1996 to 2010 are attributed to the stringent emission controls that have been or will be imposed on motor vehicles and stationary sources. PM_{10} emissions are forecast to increase, mostly due to the growth in motor vehicle travel in the Bay Area. SO_2 emissions are also forecast to increase throughout the region.

3.11.5 AIR QUALITY MONITORING

The BAAQMD operates two air quality monitoring stations in San Francisco, one near Potrero Hill and one downtown. Both stations are downwind of the Presidio. Therefore, neither station would provide a

representative indication of the superior air quality expected at the Presidio. No additional air quality monitoring is conducted within the GGNRA.

Although violations of the state and federal standard for ozone continue to persist, neither federal nor state ozone standards have recently been exceeded in the vicinity of the city of San Francisco. The only standards that have recently been exceeded are state standards for PM_{10}. Pollutants from San Francisco tend to be carried into the more sheltered areas of the region and cause violations of the standards there. The region will continue to benefit from further efforts to control emissions that originate in San Francisco.

3.11.6 LOCAL SOURCE INVENTORY

Traffic-related emissions are generated along the roadways throughout the Presidio, including Highways 1 and 101. Emissions due to traffic congestion in the Presidio or on the roadways and intersections nearby could cause localized CO concentrations to exceed the state or federal standards if congestion coincides with stagnant weather conditions.

Stationary sources at the 23-acre site include the LAIR pathological waste incinerator, which is currently permitted to operate but is not operational. Other small stationary sources that are present at the site are below the thresholds requiring permits.

3.12 Noise

3.12.1 REGULATIONS

Sound levels are audible intensities of air pressure vibrations and are most often measured with the logarithmic decibel scale (dB). To consider the human response to the pitch and loudness of a given sound in the context of environmental noise, the A-weighted frequency-dependent scale (dBA) is usually employed. The equivalent energy indicator, L_{eq}, is an average of noise over a stated time period, usually one-hour; the day-night average, L_{dn}, is a 24-hour average which accounts for the greater sensitivity of most people to nighttime noise. Generally, a 3-dB difference at any time is noticeable to most people, and a difference of 10 dB is perceived as a doubling of loudness.

Two fundamental guidelines are presented in the GMPA EIS (NPS 1994a) for evaluating the impacts of noise caused by new development. The Federal Highway Administration (FHWA) defines environmental noise thresholds for analysis of traffic noise impacts on sensitive land uses, and the American National Standards Institute (ANSI) provides guidance for yearly day-night average noise environment and land use compatibility. The FHWA Noise Abatement Criteria are contained in 23 CFR 772. The FHWA procedures state that noise impacts from traffic are serious enough to warrant consideration of abatement when noise levels for the project approach or exceed the noise abatement criteria or when they substantially exceed existing noise levels. The specified exterior noise abatement criterion for outdoor recreation areas is an hourly L_{eq} of 67 dBA and for developed areas is an hourly L_{eq} of 72 dBA. Residential uses can be held to the 67 dBA L_{eq} threshold. The ANSI guidelines take into consideration the day-night noise environment when illustrating land use compatibility.

Local noise control for the neighborhood surrounding the Presidio and the Letterman Complex is the San Francisco Noise Ordinance, Article 29 of the San Francisco Police Code. The noise ordinance regulates construction noise, fixed-source noise, and unnecessary, excessive, or offensive noise disturbances within the city. The construction noise regulations in Sections 2907 and 2908 of the San Francisco Police Code provide that:

- Construction noise is limited to 80 dBA at 100 feet from the equipment during daytime hours (7 a.m. to 8 p.m.). Impact tools are exempt from the dBA restrictions provided that they are equipped with intake and exhaust mufflers.
- Nighttime construction (8 p.m. to 7 a.m.) that would increase ambient noise levels by 5 dBA or more is prohibited.

The Presidio Trust is committed to complying with provisions equivalent to the standards in the San Francisco Noise Ordinance.

New construction of residential uses proposed in some of the alternatives would meet standards equivalent to Title 24 of the California Code of Regulations (California Noise Insulation Standards, California State Building Code [Part 2, Title 24, CCR], 1995). These standards would govern interior noise levels and apply to all new (post-1974) multi-family residential units (hotels, motels, apartments, condominiums and other attached dwellings) in California. These standards would also require that acoustical studies be performed prior to construction at residential building locations where the existing exterior L_{dn} exceeds 60 dBA. Such acoustical studies would be required to establish a design that will limit maximum L_{dn} noise levels to 45 dBA in any habitable room. The Presidio Trust would enforce the noise insulation requirements equivalent to the standards of Title 24 during the building design phase.

3.12.2 EXISTING NOISE CONDITIONS AND OBJECTIVES

The existing noise environment around the Letterman Complex is characterized by the existing traffic on internal and external roadways and natural noise sources. Although the Presidio in general is quieter than the surrounding urban environment, the areas within the Letterman Complex are bounded by traffic activity, and the proximity of the Letterman Complex to the Lombard Street and Gorgas Avenue gates makes it a location with a relatively high level of human activity.

Existing daytime noise levels in the areas surrounding the Letterman Complex are in the range of approximately 60 to 70 dBA L_{eq}, depending on the receptor's proximity to heavily traveled roadways. The results of a noise monitoring program for short-term noise levels between 11:00 a.m. and 1:00 p.m. are summarized in Table 8. Short-term (15-minute) measurements are suitable in active areas (where traffic is at or above 500 vehicles per hour) or in areas where it is unlikely that noisy vehicles would cause noise levels to fluctuate. The noise monitoring program documents existing hourly L_{eq}'s at two locations in the neighborhood adjacent to the Letterman Complex and two locations within the Presidio. The two locations on Lyon Street represent existing residences and homes which either face the traffic on Richardson Avenue (R1) or face the Presidio across Lyon Street (R2). The distance of these measurements to the centerline of Lyon Street is approximately 45 feet at each location. One location within the Presidio is used to represent Officers' Family Housing on Presidio Boulevard/Lincoln Boulevard near Lombard Street (R3), and another location within the Presidio is used to

characterize the developed space along Gorgas Avenue within the Letterman Complex area (R4). The distance of each of these measurements to the street centerline in each case is approximately 25 feet. At each of the monitoring locations, traffic noise dominates the existing daytime noise environment.

Existing traffic noise levels near U.S. Highway 101, or Richardson Avenue, have the potential to be above the 67-dBA threshold for noise abatement, but observations at locations away from U.S. Highway 101 show that noise levels are close to or within the threshold. Elevated noise levels along Presidio Boulevard/Lincoln Boulevard in the vicinity of Lombard Street are dominated by frequent passing of buses and heavy acceleration to move traffic up the hill.

Table 8
Summary of Short-Term Noise Measurements (Observed L_{eq})

SITE	DESCRIPTION	TIME	HOURLY TRAFFIC VOLUME	HOURLY L_{eq} (dBA)
R1	Lyon at Francisco (Richardson)	11:10 a.m.	356 vph	69.4
R2	Lyon at 3030 Lyon (Lombard Street Gate)	11:45 a.m.	496 vph	60.5
R3	Presidio at 545 Presidio (Lombard)	12:25 p.m.	548 vph	67.9
R4	Gorgas Avenue at Sternberg (Gymnasium)	12:55 p.m.	112 vph	61.4

Source: EIP Associates

Notes: All measurements were performed on February 23, 1999.
The duration of each noise test was 15 minutes.
vph = vehicles per hour

3.12.3 NOISE-SENSITIVE AREAS

Noise-sensitive areas are land uses that are sensitive to environmental noise. Examples of sensitive uses, or sensitive receptors, include residences, schools, day-care centers, parks, hospitals, convalescent centers, and recreational facilities. In the vicinity of the Letterman Complex, the existing and future noise sensitive uses would include:

- Recreational users at the Presidio.
- Residences within the city of San Francisco and within the Presidio.
- Proposed housing or senior housing uses within the 23-acre site that would be associated with several of the proposed alternatives.

Because the current land uses within the Letterman Complex are a developed mix of institutional and commercial/office uses, the complex is defined as a “Building/Activity Core” in the GMPA (p. 56), and the presence of recreational users within the Letterman Complex is limited. Recreational users within the Letterman Complex generally are people using the YMCA facilities or tennis courts. They would not be considered noise-sensitive receptors because these facilities are either indoors or are located in a built area more typical of the urban commercial/residential mixed-use areas in San Francisco.

3.13 Past, Present, and Reasonably Foreseeable Actions

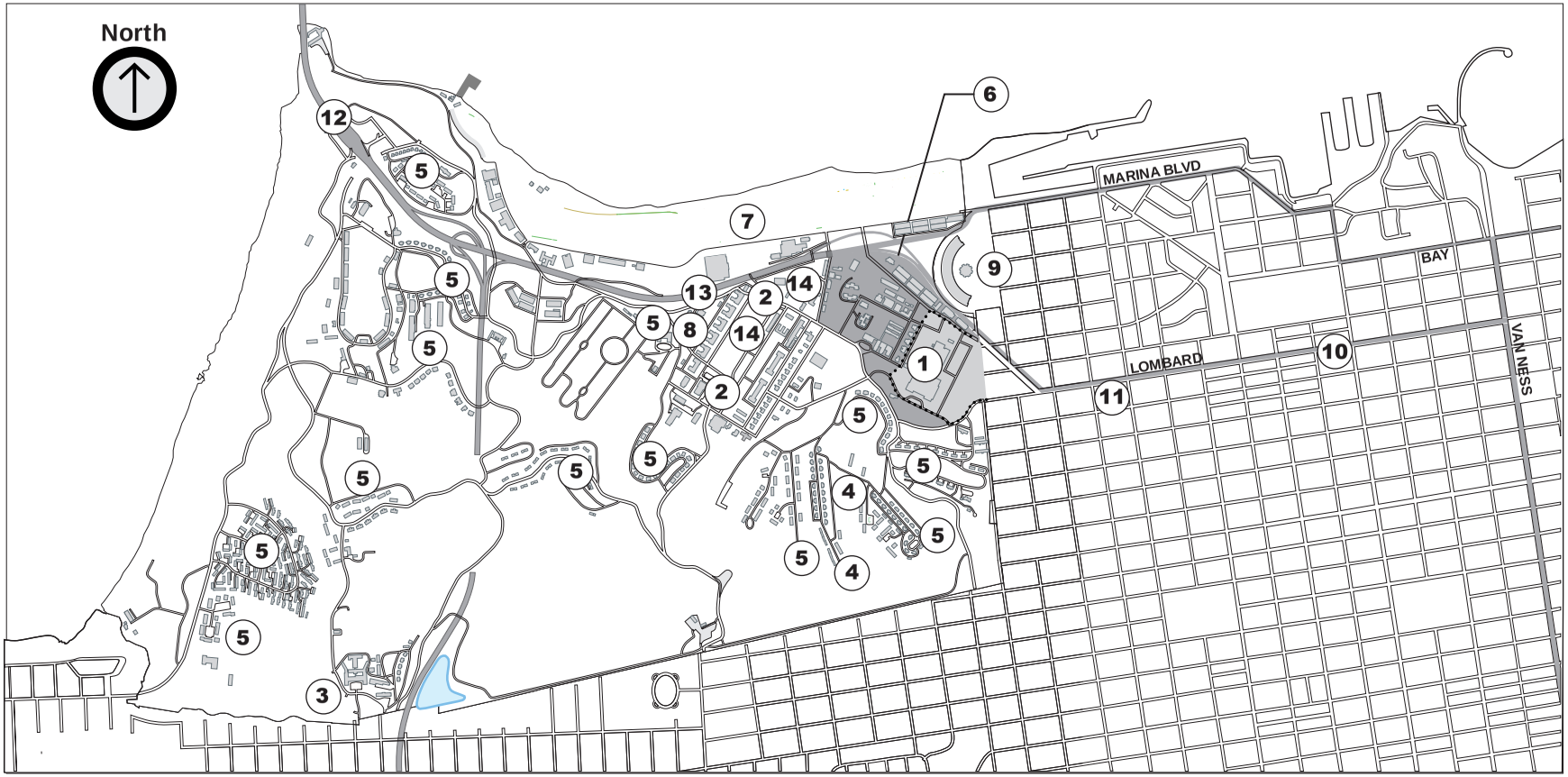
The combined, incremental effects of human activity, referred to as cumulative impacts, may pose a serious threat to the environment. While they may be insignificant by themselves, cumulative impacts accumulate over time, from one or more sources, and may potentially result in degradation of important resources. Because new development and uses at the Letterman Complex could cause or be affected by cumulative impacts with other projects or proposals, this type of impact is being assessed in this EIS as required by the Council on Environmental Quality regulations (CEQ 1978).

The GMPA EIS (page 137) used the GGNRA and the greater San Francisco Bay Area[6] as the geographic boundaries, or project impact zone[7] for the cumulative effects analysis. These boundaries were sufficiently large given the spatial scope and significance of the proposed action at that time (the conversion of the Presidio from a military post to a park, including new uses at the Letterman Complex) and the contribution of the action to cumulative effects. To avoid extending data and analytical requirements beyond those relevant to decision-making, for the purposes of this analysis, the project impact zone is more restricted in scale and includes the entire Presidio and surrounding neighborhoods. This project impact zone was determined based on:

1. the resources of concern within the zone that could be affected by the proposed action;
2. actions that may contribute, along with project effects, to potentially significant cumulative impacts; and
3. an evaluation of public concerns and the regulatory interests of the agencies involved (including the NPS and the City and County of San Francisco).

Considering the past, present, and reasonably foreseeable future actions provides a needed context for assessing cumulative impacts. The future actions to be included in the cumulative effects analysis are listed in Table 9 and shown in Figure 14. These actions, which include activities occurring outside of the Presidio Trust's jurisdiction, were chosen based on their proximity to the Letterman Complex, their potential influence on the resources affected by new development and uses within the 23-acre site (i.e., whether the effects of these actions would be similar to those of the project), and their likelihood of occurring. The actions were identified based on consultations with all relevant federal, state, and local agencies with jurisdiction within the project impact zone and investigating their actions in the planning, budgeting, or execution phase. The plans included nine projects under the jurisdiction of the Presidio Trust (including all proposals/development plans in the RFQ or RFP stages), three from the City and County of San Francisco, two from the NPS, one from the Golden Gate Bridge, Highway and Transportation District, and one from the San Francisco County Transportation Authority.[8] For additional information on the listed actions, refer to Appendix G.

[6] Defined on page 88 of the Presidio GMPA EIS as the area within 50 miles of the Presidio and shown on the Regional Context map on page 89.
[7] Defined as the area that would be affected by a proposed action.
[8] It should be noted that none of the agencies consulted have developed planning documents that identify proposed future actions in the project impact zone to facilitate the cumulative effects analysis.



1. Letterman Complex
2. Main Post Historic Buildings
3. Public Health Service Hospital
4. Playing Fields
5. Presidio Housing
6. Water Reclamation Plant
7. Crissy Field
8. William Penn Mott Jr. Visitor Center
9. Exploratorium
10. 2361 Lombard Street
11. 1880 Lombard Street
12. Electronic Toll collection
13. Doyle Drive
14. Underground Parking Structure

Figure 14. Past, Present, and Reasonably Foreseeable Future Actions

Table 9
Past, Present, and Reasonably Foreseeable Future Actions

AGENCY/PROJECT/ LOCATION	PROJECT TYPE	SIZE	STATUS	ADDITIONAL INFORMATION
PRESIDIO TRUST				
Letterman Complex	Ground lease of 23-acre site/demolition of LAMC & LAIR/New construction	900,000 square feet (sf); 2,500 employees; 1,260 parking spaces (Alt. 5)	Final EIS available for public review	Final EIS for new development and uses within the Letterman Complex
15 historic buildings[a] (Main Post)	Renovation, Lease/Office space, movie theater, overnight lodging; Interdenominational worship, food service	327,000 sf; 900 employees; 960 parking spaces	1 building leased (building 39), 4 buildings on hold (buildings 8, 9, 10, & 50), negotiating terms on remaining buildings, including consideration of tenant proposal for potential addition of 35,000 sf to building 99[b]	Refer to Appendix G and note c
Underground parking structure (Parade Grounds or French Court Site, Main Post)	Underground parking structure to minimize surface parking and maximize open space	Up to 706 parking spaces at parade grounds (2-level parking garage)/Up to 1,554 spaces at French Court (4 parking levels)	Early feasibility and planning stage	Refer to Appendix G and note d
Public Health Service Hospital Complex	Lease and rehabilitation of historic structures and new replacement construction/residential; Non-residential	412,000 sf; 375 employees; 270 parking spaces	Project on hold for 3 to 5 years	Refer to Appendix G and note e
Two playing fields: Morton Street (east housing area) and Paul Goode (north of Julius Kahn Playground)	Interim lease; renovation/school-related athletic programming, young athletic league play, adult league play	250 feet by 500 feet (20 parking spaces) and 400 feet by 420 feet (80 parking spaces), respectively	Leased	Refer to Appendix G and note f
Presidio housing (Presidio-wide)	Renovation/residential	1,304 units[g]; 1,020 parking spaces	770 units completed and occupied (as of 12/2/99)	Refer to Appendix G and note h
Water reclamation plant (Letterman Complex)	Water reclamation from Presidio main sewer line to supply irrigation water for park use	200,000 gallons per day of treated domestic wastewater	Preparing procurement, construction, and environmental review documents	Refer to Appendix G and note i

Table 9
Past, Present, and Reasonably Foreseeable Future Actions

AGENCY/PROJECT/ LOCATION	PROJECT TYPE	SIZE	STATUS	ADDITIONAL INFORMATION
NATIONAL PARK SERVICE				
Crissy Field[j]	Waterfront park restoration/features include a 7,000-foot shoreline promenade, revitalized Native Dunes, a 29-acre grassy meadow, expanded beach, a restored 20-acre tidal marsh, scenic overlooks, family picnic areas, Torpedo Wharf "warming hut" concessions, and a community environmental center	100 acres, 25 volunteers; 1,032,000 visitors/year, 560 parking spaces	Under construction; scheduled for completion: mid- to late 2000 (except visitor services at Torpedo Wharf)	Refer to Appendix G and note k
William Penn Mott Jr. visitor center (building 102, Main Post)	Seismic retrofit and rehabilitation integrating Presidio museum with visitor center/staging area for most Presidio interpretive tours	Additional 4,500 sf for educational and interpretive programs on Presidio's history; installation of new concrete shear walls	Construction to be completed in 2002 (dependent upon funding)	Refer to Appendix G and note l
CITY AND COUNTY OF SAN FRANCISCO (CCSF)				
Exploratorium (Palace of Fine Arts)	Renovation of part of the building exterior and enhancement and expansion of interior of museum of science, art, and human perception; development of outdoor exploration space, loading area, and café/food and beverage facility	Remodel of 107,000 sf of exhibit space, including 20,000 sf of new exhibit space, and new classrooms, store, temporary gallery, 250-seat theater, and third-level mezzanine for offices and workshops; parking spaces to increase from 398 to 520; annual visitors to increase from 537,800 to 609,600 (2009)	CCSF to complete environmental evaluation following submittal of revised concept and project description; construction to be completed at the end of 2002	Refer to Appendix G and note m
2361 Lombard Street 126-room hotel	Demolition of 24-Room Lanai Motel, 4,400 sf restaurant, auto repair shop, flower stand/construction of 4-story hotel	80,152 sf; 22 employees; 252 guests (full occupancy); 100 parking spaces	Preliminary negative declaration appealed/currently on hold	Refer to Appendix G and note n

Table 9
Past, Present, and Reasonably Foreseeable Future Actions

AGENCY/PROJECT/ LOCATION	PROJECT TYPE	SIZE	STATUS	ADDITIONAL INFORMATION
1880 Lombard Street residential building with 27 units plus 11,000 sf commercial (Marina District)	Demolition of 2,300 sf Jack-in-the-Box restaurant/construction of four-story residential and commercial building	60,600 sf including 11,000 sf of retail and 22,900 sf of residential (27 units); 54 to 60 residents; 31 employees; 50 parking spaces	Final negative declaration adopted	Refer to Appendix G and note o
GOLDEN GATE BRIDGE, HIGHWAY AND TRANSPORTATION DISTRICT				
Electronic toll collection (Golden Gate Bridge)	FasTrak™ electronic toll collection system[p]	1,000+ vehicles/hour during peak hours	Expected launch in spring 2000	Refer to Appendix G and note q
SAN FRANCISCO COUNTY TRANSPORTATION AUTHORITY				
Doyle Drive (San Francisco approach to Golden Gate Bridge)	Installation of divider barrier; complete replacement of facility to improve traffic conditions, structural and seismic safety of roadway, and aesthetic quality of presidio	1.5 miles long; two San Francisco approach ramps; 144,000 weekday travelers, including public transit passengers	Consultant under contract; EIR/EIS process to begin early 2000	Refer to Appendix G and note r

Notes:
[a] Includes Former Sixth Army Headquarters (building 39), Main Post Movie Theater (building 99), Presidio Officers' Club (building 50), Sixth Army Headquarters (building 38), Garrison Headquarters (building 220), former barracks and office (building 35), Victorian barracks (building 36), Victorian-style office (building 37), three connected Victorian buildings (buildings 85, 86, and 87), the Presidio Chapel (building 130), and three former officers' residences (buildings 8, 9, and 10).
[b] Expansion would be for theater uses such as the exhibition of predominantly independent films and audio-visual presentations, performance art, live entertainment and conferences, and a restaurant, a retail museum and a library store.
[c] *Request for Qualifications(RFQ) to Lease Building 39 at Historic Main Post* (Presidio Trust 1998g), *RFQ to Lease Building 99 at Historic Main Post* (Presidio Trust 1998h), *RFQ for Multi-Tenant Space and Buildings for Lease at the Historic Main Post* (Presidio Trust 1998i), *RFQ for a Unique Opportunity to Lease, Rehabilitate, and Operate the Presidio Officers' Club* (Presidio Trust 1998j).
[d] *Conceptual Engineering and Cost Estimates for Presidio Underground Parking* (Dames & Moore 1999).
[e] *RFQ for a Unique Opportunity to Lease and Rehabilitate the Historic Public Health Service Hospital Complex* (Presidio Trust 1999a).
[f] *A RFQ to Lease Playing Fields* (Presidio Trust 1999b); *Revised Conditions of Approval: RFQ for Morton Street and Paul Goode Ballfields* (NPS 1999g).
[g] Includes 1,116 single-family and multifamily units and 188 units in buildings that formerly served as barracks.
[h] *Leasing Schedule: Fiscal Years 2000-2001* (Presidio Trust 1999c).
[i] *Water Reclamation Plant Planning Phase Drawing* (Presidio Trust 1999h).
[j] Sponsored by Golden Gate National Parks Association.
[k] *Environmental Assessment for Crissy Field Plan* (NPS 1996d); *Draft Master Plan for the Crissy Field Community Environmental Center* (Golden Gate National Parks Association 1999); Personal communication with Christy Rocca, Director of Programs, Crissy Field Center, Golden Gate National Parks Association, December 9, 1999.
[l] *Building 102 Seismic – Project Description* (NPS 2000a); *William Penn Mott, Jr. Visitor Center and Museum Expansion Project* (NPS 2000b); Personal communication with Michelle Rios, Architect, NPS, December 20, 1999.
[m] *Proposed Concepts for Renovation of Palace of Fine Arts and Additional Space in the Presidio* (Exploratorium 1998); *Project Description, Exploratorium Improvement Program, Palace of Fine Arts* (Exploratorium 2000).
[n] *Preliminary Negative Declaration for 98.599E – 2361 Lombard Street 126-Room Hotel* (CCSF 1999a); Personal communication with Diane Wong, Planner and Agency Contact Person, Major Environmental Analysis Section, Department of City Planning, CCSF, December 2, 1999.

Table 9 Notes (continued)

[o] *Negative Declaration for 98.523E: 1880 Lombard Street Residential Building with 27 Units plus 11,000 Square Feet Commercial* (CCSF 1999b); Personal communication with Alice Glasner, Planner and Agency Contact Person, Major Environmental Analysis Section, Department of City Planning, CCSF, December 8, 1999.

[p] Modern, state-of-the-art use of computer technology to improve toll collection, provide better convenience for customers of the Golden Gate Bridge, reduce congestion, and enhance the collection of tolls.

[q] *Golden Gate Bridge, Highway and Transportation District Electronic Toll Collection Project Revised Final Draft Strategic Plan* (Golden Gate Bridge, Highway and Transportation District 1999); Personal communication with Maurice Palumbo, Principal Planner, Golden Gate Bridge, Highway and Transportation District, December 14, 1999.

[r] *Request for Qualifications for Preparation of the Doyle Drive Environmental and Design Study* (San Francisco County Transportation Authority 1999); *Doyle Drive Environmental and Design Study Initial Environmental Study* (San Francisco County Transportation Authority 2000).

Table 10 lists actions that are not being considered further in the cumulative impact analysis, and the criteria for excluding these actions. The listed actions would not incrementally contribute to the cumulative effects on resources affected by new uses and development at the Letterman Complex.

Table 10
Actions Considered but Excluded from Cumulative Impact Analysis

AGENCY/PROJECT/ LOCATION	PROJECT TYPE	SIZE	REASON FOR EXCLUSION
PRESIDIO TRUST/NATIONAL PARK SERVICE			
Tennessee Hollow (Various Planning Areas)	Drainage restoration	Drains a watershed of ~250 acres	Drainage would not be affected by cumulative impacts[a] and the action itself would not affect resources of concern[b] that are the subject of the cumulative impacts analysis
Vegetation Management Plan (Presidio-Wide)	Management of vegetation resources of natural and historical significance	Presidio-wide	Action would only have beneficial cumulative effects[c] and does not relate to the project under review
Presidio Trails and Bikeways Master Plan (Presidio-Wide)	Comprehensive trail plan for bicycle and pedestrian routes	Approximately 11 miles of hiking trails and 14 miles of bicycle routes; approximately 8,000 trips across Presidio boundaries each weekday, and over 14,000 trips each weekend day	Action is only likely to have beneficial cumulative effects[d] and does not relate to the project under review
NATIONAL PARK SERVICE			
Ferry Service to Torpedo Wharf (Crissy Field)	Recreation and commuter service as part of a future Bay Area high-speed water transit system	Not applicable	Insufficient information related to frequency of trips, size of boats, and other operational characteristics of potential ferry service to determine the potential for project-related or cumulative impacts[e]
Interpretive Planning for the Presidio (Presidio-Wide)	Personal and media-based services to provide educational opportunities for Presidio visitors to increase environmental and cultural awareness	Not applicable	Action has little relevance to the effects of the proposed action and therefore its inclusion would be unnecessary
Seismic Retrofit (Fort Point National Historic Site)	Structural reinforcement of south scarp wall and masonry preservation	Not applicable	Small-scale action that has minimal impacts of short-duration which would not likely contribute significantly to cumulative impacts[f]

Table 10
Actions Considered but Excluded from Cumulative Impact Analysis

AGENCY/PROJECT/ LOCATION	PROJECT TYPE	SIZE	REASON FOR EXCLUSION
GOLDEN GATE BRIDGE, HIGHWAY AND TRANSPORTATION DISTRICT			
Seismic Retrofit (Golden Gate Bridge)	Seismic retrofit measures, including tuning and strengthening structures (includes structural steel of bridge and its approach viaducts, as well as reinforced concrete piers, pylons and anchorage housing)	1.7-mile span, 41 million vehicles per year, 3,100 construction jobs over 11.5 years	Action does not contribute significantly to cumulative impacts to any resources[g]
Toll Plaza Redesign	Minor realignment of on- and off-ramps, relocation of bus stops, changes to pedestrian circulation	Not applicable	Action on hold due to seismic retrofit (see above) and electronic toll collection[h]
CITY AND COUNTY OF SAN FRANCISCO (CCSF)			
2755 Lombard Street Travelodge at the Presidio	Expansion?[i]	Unknown	Action is not reasonably foreseeable and therefore project-specific and cumulative impacts would be speculative[j]

Notes:
[a] All construction projects in Table 9 would include Storm Water Pollution Prevention Plans (SWPPP) that would prohibit the discharge of storm water that would cause or threaten pollution, contamination, or nuisance. The SWPPPs would comply with requirements in the statewide General Permit adopted to deal with the cumulative problem of all storm-water discharges associated with construction activity. Permit conditions would be consistent with the San Francisco Bay Regional Water Quality Control Board's erosion and sediment control policy (Resolution No. 80-5) and consistent with local agency ordinance and regulatory programs. The SWPPPs would also comply with the San Francisco Bay Region Basin Plan, the master policy document that contains descriptions of the legal, technical, and programmatic bases of water quality regulation in the San Francisco Bay region, which also establishes conditions (discharge prohibitions) that must be met at all times.
[b] Includes solid waste, water supply and distribution, schools, housing, medical research, traffic and transportation systems, cultural resources, scenic viewing, air quality, and noise.
[c] *Presidio of San Francisco Vegetation Management Plan and Environmental Assessment* (NPS 1999a).
[d] *Scope of Services for the Presidio Trailways Master Plan and Environmental Assessment* (NPS 1999h).
[e] *Fort Baker Plan Final Environmental Impact Statement, Volume I* (NPS 1999c). However, ferry service would potentially reduce the number of vehicle trips to the Letterman Complex. Ferry access would need to avoid shallow shoreline approaches which could impact resources not related to the project under review (i.e., Dungeness crab nesting areas and boardsailers) (Bay Area Council 1999).
[f] *Administrative Project Review Conditions and Designation of Categorical Exclusion for Repair of Earthquake Damage and Miscellaneous Masonry Repairs – Fort Point* (NPS 1999d)
[g] Including soil erosion during construction, surface water quality effects, temporary closure of construction areas to visitors, air quality/dust emissions during construction, potential archeological effects, and temporary traffic impacts. Traffic on the bridge would not be affected by the project, with the exception of some lane restrictions that may occur at night, when traffic is lightest, during the second phase of construction (Federal Highway Administration et al. 1995).
[h] Personal communication with Maurice Palumbo, Principal Planner, Golden Gate Bridge, Highway and Transportation District, December 28, 1999.
[i] Electronic mail correspondence from Wendy Poinsot (Presidio Trust 1999g).
[j] CCSF is unaware of any expansion plans and no such project has been entered into the city's building permit tracking system (personal communication with Diane Wong, Planner, Major Environmental Analysis Section, San Francisco Planning Department and David Lindsey, Planner and Team Leader, Northwest Quadrant, San Francisco Planning Department, December 17, 1999).

This section describes the potential environmental effects associated with implementation of the alternatives. The environmental analysis evaluates three types of effects: direct, indirect, and cumulative. Direct effects would be caused by an alternative and would occur at the time the alternative is implemented and the site is used and operated. Indirect effects would also be caused by an alternative but may be more removed in time or distance. Cumulative effects are the effects of the alternatives added to the effects of other past, present and reasonably foreseeable future plans, projects, and activities in the Presidio and surrounding area.

Table 11 summarizes the impacts associated with the alternatives evaluated in this EIS. The analysis is presented by alternative as follows:

- Section 4.1 discloses the potential environmental effects of Alternative 1, Science and Education Center (Updated Presidio GMPA Alternative).
- Section 4.2 discloses the potential environmental effects of Alternative 2, Sustainable Urban Village.
- Section 4.3 discloses the potential environmental effects of Alternative 3, Mixed-Use Development.
- Section 4.4 discloses the potential environmental effects of Alternative 4, Live/Work Village.
- Section 4.5 discloses the potential environmental effects of Alternative 5, Digital Arts Center (Preferred Alternative).
- Section 4.6 is a discussion of the environmental effects of Alternative 6, Minimum Management (No Action).
- Section 4.7 identifies mitigation measures that would reduce significant impacts to a less-than-significant level.

The focus of analysis within Section 4.1 is on the entire 60-acre Letterman Complex, since Alternative 1 would allow infill construction within the entire complex. Since new development and uses under Alternatives 2 through 5 would be limited to replacement construction within a 23-acre site within the complex and Alternative 6 would not involve any new construction, Sections 4.2 through 4.6 address direct impacts within the 23 acres, as well as any direct and indirect impacts on the remainder of the complex, the park, and surrounding areas. Within Sections 4.1 through 4.6, environmental effects are organized into the following impact topics. The rationale for the selection of topics is discussed by major category in Appendix A and in Section 1.5.

- consistency with Presidio goals and approved plans and policies
- solid waste
- water supply and distribution
- schools
- housing
- medical research
- traffic and transportation systems
- cultural resources (including visual resources and visitor experience)
- air quality
- noise
- cumulative impacts

The methods used to predict impacts and criteria to determine whether an impact may be significant are included at the beginning of the discussion of impacts for Alternative 1 and apply to all alternatives. Cumulative

impacts and unavoidable adverse effects are disclosed at the end of the discussion of each alternative. Tables 12 through 22 summarize by alternative a number of projections related to new uses within the Letterman Complex. They include water system demand, school enrollment, new housing demand, transportation mode use and parking demand, traffic volumes and levels of service (including cumulative) and estimated vehicular emissions. These projections were used in analyzing potential impacts on the topics listed above.

Table 11
Summary of Environmental Consequences

IMPACT	ALTERNATIVE 1: SCIENCE AND EDUCATION CENTER	ALTERNATIVE 2: SUSTAINABLE URBAN VILLAGE	ALTERNATIVE 3: MIXED-USE DEVELOPMENT	ALTERNATIVE 4: LIVE/WORK VILLAGE	ALTERNATIVE 5: DIGITAL ARTS CENTER	ALTERNATIVE 6: MINIMUM MANAGEMENT (NO ACTION)
Consistency with Presidio Goals and GMPA	A science and education center would be consistent with the specific proposal in the GMPA for the Letterman Complex to serve as a science and education center. Would promote the GMPA concept for infill construction within the complex. New construction would be equal to the total amount of gross square feet (503,000) envisioned in the GMPA. Also consistent with most of the General Objectives of the GMPA. May not be consistent, however, with the General Objective to sustain the Presidio indefinitely as a great national park in an urban setting since there is no current demand for the 23-acre site for laboratory-based research.	General offices, housing and an inn/retreat would be consistent with the General Objectives of the GMPA. Would also be consistent with a number of the more specific, goals and planning principles of the GMPA. Would not implement the specific proposal in the GMPA for the Letterman Complex to serve as a science and education center. Replacement construction within the 23-acre site would not promote the GMPA concept for infill construction, and would increase the total amount of gross square feet of replacement construction (from 503,000 to approximately 900,000) envisioned in the GMPA. GMPA's key restrictions on maximum allowable square footage for the complex (1.3 million square feet) and maximum allowable height of new construction (60 feet)	General offices, lodge, conference center and senior assisted-living facilities would be consistent with the General Objectives of the GMPA. Would also be consistent with a number of the more specific goals and planning principles of the GMPA. Would not implement the specific proposal in the GMPA for the Letterman Complex to serve as a science and education center. Consistency of replacement construction would be similar to Alternative 2.	General offices and housing would be consistent with the General Objectives of the GMPA. Would also be consistent with a number of the more specific goals and planning principles of the GMPA. Would not implement the specific proposal in the GMPA for the Letterman Complex to serve as a science and education center. Consistency of replacement construction would be similar to Alternative 2.	A digital arts center would be consistent with the General Objectives of the GMPA. Would also be consistent with a number of the more specific goals and planning principles of the GMPA. Although Alternative 5 would not implement the specific proposal in the GMPA for the Letterman Complex to serve as a science and education center, it would retain and use the site for research purposes by a single tenant or a collaborative group of institutions, and use of the facilities by staff, visiting researchers and other special program participants as envisioned in the GMPA. Consistency of replacement construction with the GMPA would be similar to Alternative 2.	General offices may be inconsistent with the General Objective of the GMPA to provide for appropriate uses of the Presidio. Would also be inconsistent with a number of the more specific goals and planning principles of the GMPA. Specifically, it could conflict with the GMPA's major directions for the future of the Presidio and the Letterman Complex, because use of the LAIR may not be closely related to the park's purpose.

Table 11
Summary of Environmental Consequences

IMPACT	ALTERNATIVE 1: SCIENCE AND EDUCATION CENTER	ALTERNATIVE 2: SUSTAINABLE URBAN VILLAGE	ALTERNATIVE 3: MIXED-USE DEVELOPMENT	ALTERNATIVE 4: LIVE/WORK VILLAGE	ALTERNATIVE 5: DIGITAL ARTS CENTER	ALTERNATIVE 6: MINIMUM MANAGEMENT (NO ACTION)
Consistency with Presidio GMPA – continued		would not be exceeded. Replacement construction would proceed in accordance with the Planning Guidelines and design review as recommended within the GMPA.				
Solid Waste						
Significant and Adverse Impact of Disposal of Demolition Debris Offsite (Mitigated to a Less-than-Significant Level by SW-1)	Would generate 35,400 tons of debris during construction activities. Minimal impact on regional landfills.	Would generate 80,000 tons of debris during construction activities. Minimal impact on regional landfills.	Impact would be similar to Alternative 2.	Impact would be similar to Alternative 2.	Impact would be similar to Alternative 2.	No building demolition would occur and no debris would be generated. No impact on regional landfills.

Table 11
Summary of Environmental Consequences

IMPACT	ALTERNATIVE 1: SCIENCE AND EDUCATION CENTER	ALTERNATIVE 2: SUSTAINABLE URBAN VILLAGE	ALTERNATIVE 3: MIXED-USE DEVELOPMENT	ALTERNATIVE 4: LIVE/WORK VILLAGE	ALTERNATIVE 5: DIGITAL ARTS CENTER	ALTERNATIVE 6: MINIMUM MANAGEMENT (NO ACTION)
Water Supply and Distribution						
Significant and Adverse Cumulative Impact of Water Consumption on Available Water (Mitigated to a Less-than-Significant Level by WS-1, WS-2, and WS-3)	Would demand 20,000 gallons per day (gpd) compared to 89,000 gpd threshold established for site. Would contribute to cumulative shortfalls on Presidio's local water supply (Lobos Creek).	Would demand 111,000 gpd compared to 89,000 gpd threshold established for site. Would contribute to cumulative shortfalls on Presidio's local water supply (Lobos Creek).	Would demand 68,000 gpd compared to 89,000 gpd threshold established for site. Would contribute to cumulative shortfalls on Presidio's local water supply (Lobos Creek).	Would demand 64,000 gpd compared to 89,000 gpd threshold established for site. Would contribute to cumulative shortfalls on Presidio's local water supply (Lobos Creek).	Would demand 72,000 gpd compared to 89,000 gpd threshold established for site. Would contribute to cumulative shortfalls on Presidio's local water supply (Lobos Creek).	Would demand 35,000 gpd compared to 89,000 gpd threshold established for site. Impact would be similar to Alternative 1.
Schools						
Less-than-Significant Impact on Capacity at San Francisco Unified School District Schools (No Mitigation Required)	District schools would be able to accommodate 92 schoolchildren likely to enroll in Marina district schools.	District schools would be able to accommodate 253 schoolchildren likely to enroll in Marina district schools.	Impact would be similar to Alternative 1 (92 schoolchildren).	District schools would be able to accommodate 273 schoolchildren likely to enroll in Marina district schools.	Impact would be similar to Alternative 1 (92 schoolchildren).	Impact would be similar to Alternative 1 (92 schoolchildren).

Table 11
Summary of Environmental Consequences

IMPACT	ALTERNATIVE 1: SCIENCE AND EDUCATION CENTER	ALTERNATIVE 2: SUSTAINABLE URBAN VILLAGE	ALTERNATIVE 3: MIXED-USE DEVELOPMENT	ALTERNATIVE 4: LIVE/WORK VILLAGE	ALTERNATIVE 5: DIGITAL ARTS CENTER	ALTERNATIVE 6: MINIMUM MANAGEMENT (NO ACTION)
Housing						
Significant, Unavoidable, and Adverse Impact due to Increase in Demand for Housing in City of San Francisco and Bay Area (Alternatives 3 and 5 Only)	Presidio housing stock would meet 100 percent of employment-related housing demand of 187 units.	Presidio housing stock, including 300 to 400 new houses proposed as part of the alternative, would meet 100 percent of employment-related housing demand of 385 units.	Presidio housing stock would meet 69 percent of employment-related housing demand of 385 units. New demand on regional housing would be 120 units, including 66 units in the city of San Francisco.	Presidio housing stock, including 400 to 450 new houses proposed as part of the project, would meet 100 percent of employment-related housing demand of 462 units.	Presidio housing stock would meet 55 percent of employment-related housing demand of 481 units. New demand on regional housing would be 216 units, including 119 units in the city of San Francisco.	Presidio housing stock would meet 100 percent of employment-related housing demand of 159 units.
Medical Research						
Beneficial (Alternatives 1, 1, 2 and 6) or Less-than-Significant (Alternatives 3, 4, and 5) Impacts on Medical Research in the Bay Area (No Mitigation Required)	Reuse of the site for medical research would have a beneficial impact on medical, life science and/or earth science research by providing research space at the site.	Reuse of a portion of the site for research on aging would have a beneficial impact on medical and life science research by providing research space at the site.	Conversion of the site to alternative uses would not have a negative impact on medical and life science research since research space would be met at other nearby locations (notably Mission Bay).	Impact would be the same as Alternative 3.	Impacts would be the same as Alternative 3.	Should the site be reused for medical research, the impacts would be similar to Alternative 1. Should the site be converted to alternative uses, the impacts would be the same as Alternative 3.

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IMPACT	ALTERNATIVE 1: SCIENCE AND EDUCATION CENTER	ALTERNATIVE 2: SUSTAINABLE URBAN VILLAGE	ALTERNATIVE 3: MIXED-USE DEVELOPMENT	ALTERNATIVE 4: LIVE/WORK VILLAGE	ALTERNATIVE 5: DIGITAL ARTS CENTER	ALTERNATIVE 6: MINIMUM MANAGEMENT (NO ACTION)
Traffic and Transportation Systems						
Significant and Adverse Impact of Additional Traffic Volumes on Local Transportation Network (Mitigated to a Less-than-Significant Level by TR-1, TR-2, TR-3, TR-6, TR-7, and TR-8)	Average daily traffic would increase by about 4,560 external trips on weekdays. Impacts would be avoided by implementing intersection improvements at 3 locations (Lyon Street/Richardson Avenue/Gorgas Avenue, Lombard Street/Lyon Street, and Lombard Street/ Presidio Boulevard).	Average daily traffic would increase by about 4,280 external trips on weekdays. Impacts would be avoided by implementing intersection and bicycle route improvements described in Alternative 1.	Average daily traffic would increase by about 4,460 external trips on weekdays. Impacts would be avoided by implementing intersection and bicycle route improvements described in Alternative 1.	Average daily traffic would increase by about 5,140 external trips on weekdays. Impacts would be avoided by implementing intersection and bicycle route improvements described in Alternative 1.	Average daily traffic would increase by about 4,360 external trips on weekdays. Impacts would be avoided by implementing intersection and bicycle route improvements described in Alternative 1.	Average daily traffic would increase by about 1,960 external trips on weekdays. Impacts would be avoided by coordinating with the city to implement intersection improvements described in Alternative 1.
Significant and Adverse Impact of Increased Parking Demand (Mitigated to a Less-than-Significant Level by TR-4 and TR-8)	Demand of 1,320 parking spaces would exceed the proposed supply of 1,150 spaces, which would require additional Transportation Demand Management (TDM) strategies to reduce shortfall of 170 spaces.	Demand of 1,110 parking spaces would exceed the proposed supply of 1,020 spaces, which would require additional TDM strategies to reduce shortfall of 90 spaces.	Proposed supply of 1,690 parking spaces is adequate to meet demand of 1,280 spaces.	Proposed supply of 1,390 parking spaces is adequate to meet demand of 1,160 spaces.	Proposed supply of 1,530 parking spaces is adequate to meet demand of 1,440 spaces.	Proposed supply of 770 parking spaces is adequate to meet demand of 580 spaces.

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IMPACT	ALTERNATIVE 1: SCIENCE AND EDUCATION CENTER	ALTERNATIVE 2: SUSTAINABLE URBAN VILLAGE	ALTERNATIVE 3: MIXED-USE DEVELOPMENT	ALTERNATIVE 4: LIVE/WORK VILLAGE	ALTERNATIVE 5: DIGITAL ARTS CENTER	ALTERNATIVE 6: MINIMUM MANAGEMENT (NO ACTION)
Traffic and Transportation Systems – continued						
Beneficial Impact of TDM Measure (No Mitigation Required)	TDM measures as identified in TR-8 would be provided.	Additional TDM measures would reduce the number of trips that would leave the site.	Beneficial impact would be similar to Alternative 2.	Beneficial impact would be similar to Alternative 2.	Beneficial impact would be similar to Alternative 2.	TDM measures as identified in TR-8 would be provided.
Significant and Adverse Impact of Construction Equipment and Vehicles (Mitigated to a Less-than-Significant Level by TR-5)	Implementation of a Construction Traffic Management Plan would minimize inconveniences to local and regional traffic.	Similar to Alternative 1.	Similar to Alternative 1.	Similar to Alternative 1.	Similar to Alternative 1.	Inconvenience to local and regional traffic would be minimal since no substantial construction would occur.
Cultural Resources						
Beneficial Effect of Removing LAMC (Alternative 1) and Adverse Effect of Removing LAMC/LAIR (Alternatives 2-5) and Adding New Construction	Removal of LAMC and infill construction consistent with Planning and Design Guidelines for new construction would have a beneficial effect on the historic setting.	Removal of LAMC and LAIR and replacement construction consistent with Planning and Design Guidelines would foreclose opportunities for infill construction which would have an adverse effect on the adjacent historic hospital complex.	Adverse effect on the historic setting would be similar to Alternative 2.	Adverse effect on the historic setting would be similar to Alternative 2.	Adverse effect on the historic setting would be similar to Alternative 2.	No beneficial effect on historic setting since LAMC and LAIR would remain and building treatments would be minimal.

Table 11
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IMPACT	ALTERNATIVE 1: SCIENCE AND EDUCATION CENTER	ALTERNATIVE 2: SUSTAINABLE URBAN VILLAGE	ALTERNATIVE 3: MIXED-USE DEVELOPMENT	ALTERNATIVE 4: LIVE/WORK VILLAGE	ALTERNATIVE 5: DIGITAL ARTS CENTER	ALTERNATIVE 6: MINIMUM MANAGEMENT (NO ACTION)
Cultural Resources – continued						
Adverse Effect on Historic Setting due to Retaining LAIR (Alternatives 1 and 6) or New Construction (Alternatives 2-5) (Adverse Effect Avoided for Alternatives 2-5 if CR-1 is Implemented)	Retention of the LAIR would only allow for the partial restoration of the historic setting of the earlier hospital complex and significant streetscapes. The building would continue to have an adverse effect on adjacent historic structures.	Siting of buildings along O'Reilly Avenue would have an adverse effect on adjacent historic structures unless CR-1 is implemented. Direct entry into the site would be inconsistent with the historic streetscape unless CR-1 is implemented.	Siting and length of connected buildings along O'Reilly Avenue would have an adverse effect on adjacent historic structures unless CR-1 is implemented.	The four office buildings would have an adverse effect on the historic setting because of their bulk and massing unless CR-1 is implemented.	Siting and length of connected buildings along O'Reilly Avenue would have an adverse effect on adjacent historic structures unless CR-1 is implemented. Buildings along western edge of the 23-acre site would isolate it from the adjacent historic hospital complex unless CR-1 is implemented.	Retention of the LAMC/LAIR would not allow for the restoration of the historic setting of the earlier hospital complex and significant streetscapes. The buildings would continue to have an adverse effect on adjacent historic structures.
Visual						
Significant and Adverse Visual Impacts (Unavoidable for Alternatives 1 and 6; Unavoidable for Alternatives 2 through 5 unless Potentially Mitigated to a Less-than-Significant Level by VR-1)	Should LAMC be retained, the visual integrity of the complex would continue to be diminished and regional views would remain significantly affected. Implementation of VR-2 would minimize visual impacts of new infill construction within the complex.	Removal of LAMC and LAIR and the introduction of lower-scaled new construction would enhance the visual integrity of the Letterman Complex. However, buildings located close to Lombard Street Gate would dominate entry views into the Presidio unless VR-1 is implemented.	Removal of LAMC and LAIR and the introduction of lower-scaled new construction would enhance the visual integrity of the Letterman Complex. However, historic view corridor at Edie Road would not be preserved unless VR-1 is implemented.	Removal of LAMC and LAIR and the introduction of lower-scaled new construction would enhance the visual integrity of the Letterman Complex. However, historic view corridors at Thornburg Road and Edie Road would not be preserved unless VR-1 is implemented.	Removal of LAMC and LAIR and the introduction of lower-scaled new construction would enhance the visual integrity of the Letterman Complex. However, historic view corridor at Edie Road would not be preserved unless VR-1 is implemented.	Retention of the LAMC and LAIR would continue to diminish the visual integrity of the complex and significantly affect regional views.

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IMPACT	ALTERNATIVE 1: SCIENCE AND EDUCATION CENTER	ALTERNATIVE 2: SUSTAINABLE URBAN VILLAGE	ALTERNATIVE 3: MIXED-USE DEVELOPMENT	ALTERNATIVE 4: LIVE/WORK VILLAGE	ALTERNATIVE 5: DIGITAL ARTS CENTER	ALTERNATIVE 6: MINIMUM MANAGEMENT (NO ACTION)
Visitor Experience						
Beneficial Impact on Visitor Experience (No Mitigation Required)	The 23-acre site would be used as a research and education facility that would provide new opportunities for residents and visitors to attend educational programs and learn about advances in health and science.	The two restaurants and inn/retreat on the 23-acre site would offer a village atmosphere that would enhance the visitor experience.	The village commons, lodge, conference center, culinary institute, restaurants, and shops would provide a lively community of diverse programs and activities to enhance the visitor experience.	The central public green, new pavilion at the green, and market hall would provide public gathering places. The library on history and genealogy, and museum and cultural center would provide new visitor opportunities. Education programs on conservation, sustainability, Internet technology, and environmental themes would enhance the Presidio community.	The 7-acre Great Lawn, water feature, promenade, and café would provide public gathering places. The museum for visual arts, visual effects archive, and screening/meeting rooms for community use would also enhance the visitor experience.	Organizations occupying LAMC and LAIR would most likely provide some public access and visitor programs that would provide beneficial effects.
Archeological Properties						
Adverse Effect on Archeological Properties (Adverse Effect Avoided by AR-1)	Ground-disturbing activities and construction projects have the potential to encounter archeological resources.	Effect on archeological resources would be similar to Alternative 1.	Effect on archeological resources would be similar to Alternative 1.	Effect on archeological resources would be similar to Alternative 1.	Effect on archeological resources would be similar to Alternative 1.	No adverse effect on archeological resources since no ground disturbance or new construction would occur.

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Summary of Environmental Consequences

IMPACT	ALTERNATIVE 1: SCIENCE AND EDUCATION CENTER	ALTERNATIVE 2: SUSTAINABLE URBAN VILLAGE	ALTERNATIVE 3: MIXED-USE DEVELOPMENT	ALTERNATIVE 4: LIVE/WORK VILLAGE	ALTERNATIVE 5: DIGITAL ARTS CENTER	ALTERNATIVE 6: MINIMUM MANAGEMENT (NO ACTION)
Air Quality						
Significant and Adverse Short-Term Demolition/ Construction Impacts (Mitigated to a Less-Than-Significant Level by AQ-1 and AQ-2)	Heavy equipment could emit particulate matter (PM_{10}). Feasible control measures would be employed to minimize PM_{10} emissions during construction.	Impacts and control measures would be similar to Alternative 1.	Impacts and control measures would be similar to Alternative 1.	Impacts and control measures would be similar to Alternative 1.	Impacts and control measures would be similar to Alternative 1.	PM_{10} emissions would be minimal because no substantial construction would occur.
Significant and Adverse Long-Term Regional Operation Impacts (Unavoidable for Alternatives 1 and 4 Only; Alternatives 2, 3, 5, and 6 Mitigated to a Less-than-Significant Level by AQ-3)	The approximately 88 lb/day of nitrogen oxides (NO_x) generated by increased traffic would exceed the Bay Area Air Quality Management District (BAAQMD) significance threshold of 80 lb/day.	Increased traffic would not result in regional operational emissions exceeding any of the BAAQMD's significance thresholds for reactive organic gases (ROG), NO_x or PM_{10}.	Impacts would be similar to Alternative 2.	The approximately 90 lb/day of NO_x generated by increased traffic would exceed the BAAQMD significance threshold of 80 lb/day.	Impacts would be similar to Alternative 2.	Impacts would be similar to Alternative 2.

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Summary of Environmental Consequences

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Air Quality – continued						
Less-Than-Significant Long-Term Local Operations Impacts (No Mitigation Required)	Localized carbon monoxide (CO) concentrations due to increased traffic would be approximately 7.9 ppm of CO on a 1-hour basis and 5.4 ppm of CO on an 8-hour basis. These roadside concentrations would not exceed the state ambient air quality standards for CO of 20 ppm on a one-hour basis and 9 ppm on an 8-hour basis.	Localized CO concentrations due to increased traffic would be less than Alternative 1 and would not exceed the state ambient air quality standards for CO.	Localized CO concentrations due to increased traffic would be less than Alternative 1 and would not exceed the state ambient air quality standards for CO.	Localized CO concentrations due to increased traffic would be less than Alternative 1 and would not exceed the state ambient air quality standards for CO.	Localized CO concentrations due to increased traffic would be less than Alternative 1 and would not exceed the state ambient air quality standards for CO.	Localized CO concentrations due to increased traffic would be less than Alternative 1 and would not exceed the state ambient air quality standards for CO.
Noise						
Significant, Unavoidable, and Adverse Short-Term Impact due to Demolition and Construction Activities (Mitigated but not to a Less than Significant Level by NO-1)	Demolition of the LAMC and infill construction would generate intermittent noise of a short-term nature. Noise would be noticeable to residents within the adjacent neighborhoods and recreational users outside the complex, but because noise	Demolition of the LAMC and LAIR and replacement construction would generate intermittent noise of a short-term nature. Noise would be noticeable to residents within the adjacent neighborhoods and recreational users outside the Letterman complex, but because	The short-term noise impact would be similar to Alternative 2.	The short-term noise impact would be similar to Alternative 2.	The short-term noise impact would be similar to Alternative 2.	The short-term noise impact would be avoided since no building demolition or replacement construction would occur.

Table 11
Summary of Environmental Consequences

IMPACT	ALTERNATIVE 1: SCIENCE AND EDUCATION CENTER	ALTERNATIVE 2: SUSTAINABLE URBAN VILLAGE	ALTERNATIVE 3: MIXED-USE DEVELOPMENT	ALTERNATIVE 4: LIVE/WORK VILLAGE	ALTERNATIVE 5: DIGITAL ARTS CENTER	ALTERNATIVE 6: MINIMUM MANAGEMENT (NO ACTION)
Noise – continued	would be attenuated over distance and masked by unrelated urban noise, noise levels are not expected to be disruptive or exceed noise thresholds in the San Francisco Noise Ordinance. Short-term impact tool use and demolition activities could be disruptive to people within the complex, particularly those closest to (i.e., within 250 feet from) construction equipment.	noise would be attenuated over distance and masked by unrelated urban noise, noise levels are not expected to be disruptive or exceed noise thresholds in the San Francisco Noise Ordinance. Short-term impact tool use and demolition activities could be disruptive to people within the complex, particularly those closest to (i.e., within 250 feet from) construction equipment.				
Less than Significant Long-Term Impact due to Traffic Noise Increases (No Mitigation Required)	Existing sensitive receptors would not experience noticeable increases in peak traffic noise levels (i.e., greater than 3 dBA). New uses within the site would be consistent with the noise abatement criteria.	Traffic volumes would be within 5 percent of those shown for Alternative 1, and the associated noise level increases would be nearly equivalent.	Traffic volumes would be less than those shown for Alternative 1, and the associated noise level increases would be subsequently lower.	While traffic volumes would be approximately 11 percent above those shown for Alternative 1, existing sensitive receptors would not experience noticeable increases in peak traffic noise levels (i.e., greater than 3 dBA). New uses within the site would be consistent with the noise abatement criteria.	Traffic volumes would be less than those shown for Alternative 1, and the associated noise level increases would be subsequently lower.	Impacts of traffic noise would be less than those described under Alternative 4.

Table 11
Summary of Environmental Consequences

IMPACT	ALTERNATIVE 1: SCIENCE AND EDUCATION CENTER	ALTERNATIVE 2: SUSTAINABLE URBAN VILLAGE	ALTERNATIVE 3: MIXED-USE DEVELOPMENT	ALTERNATIVE 4: LIVE/WORK VILLAGE	ALTERNATIVE 5: DIGITAL ARTS CENTER	ALTERNATIVE 6: MINIMUM MANAGEMENT (NO ACTION)
Cumulative Impacts						
Less-than-Significant Cumulative Impacts (No Mitigation Required)	Alternative 1 would contribute to cumulative impacts of other federal, state, and local actions on the following resources within the Presidio and surrounding neighborhoods: solid waste, water supply and distribution, schools, housing, traffic and transportation systems, cultural resources (including visitor experience and visual resources), air quality, and noise. Mitigation would address Alternative 1's contribution to cumulative impacts such that the total effect would not be significant.	Alternative 2 would contribute to cumulative impacts of other federal, state, and local actions on the following resources within the Presidio and surrounding neighborhoods: solid waste, water supply and distribution, schools, housing, traffic and transportation systems, cultural resources (including visitor experience and visual resources), air quality, and noise. Mitigation would address Alternative 2's contribution to cumulative impacts such that the total effect would not be significant.	Alternative 3 would contribute to cumulative impacts of other federal, state, and local actions on the following resources within the Presidio and surrounding neighborhoods: solid waste, water supply and distribution, schools, housing, traffic and transportation systems, cultural resources (including visitor experience and visual resources), air quality, and noise. Mitigation would address Alternative 3's contribution to cumulative impacts such that the total effect would not be significant.	Alternative 4 would contribute to cumulative impacts of other federal, state, and local actions on the following resources within the Presidio and surrounding neighborhoods: solid waste, water supply and distribution, schools, housing, traffic and transportation systems, cultural resources (including visitor experience and visual resources), air quality, and noise. Mitigation would address Alternative 4's contribution to cumulative impacts such that the total effect would not be significant.	Alternative 5 would contribute to cumulative impacts of other federal, state, and local actions on the following resources within the Presidio and surrounding neighborhoods: solid waste, water supply and distribution, schools, housing, traffic and transportation systems, cultural resources (including visitor experience and visual resources), air quality, and noise. Mitigation would address Alternative 5's contribution to cumulative impacts such that the total effect would not be significant.	Alternative 6 would contribute to cumulative impacts of other federal, state, and local actions on the following resources within the Presidio and surrounding neighborhoods: solid waste, water supply and distribution, schools, housing, traffic and transportation systems, cultural resources (including visitor experience and visual resources), air quality, and noise. Mitigation would address Alternative 6's contribution to cumulative impacts such that the total effect would not be significant.

Table 12
Water System Demand (gpd)

	ALTERNATIVE TOTAL EST. DAILY WATER DEMAND	BASELINE LAMC/LAIR WATER DEMAND	NET DIRECT IMPACT	PRESIDIO TOTAL WATER DEMAND WITH ALTERNATIVE	PEAK PRESIDIO DEMAND MET BY AVAILABLE PEAK LOBOS CREEK FLOW[a]	NET CUMULATIVE PEAK SHORTFALL[b]
Alternative 1	20,262[c]	88,798	-68,536	1,621,464	1,400,000	221,464
Alternative 2	111,280[d]	88,798	22,482	1,712,482	1,400,000	312,482
Alternative 3	67,850[e]	88,798	-20,948	1,669,052	1,400,000	269,052
Alternative 4	63,836[f]	88,798	-24,962	1,665,038	1,400,000	265,038
Alternative 5	84,574[g]	88,798	-4,224	1,685,776	1,400,000	285,776
Alternative 6	35,398[h]	88,798	-53,400	1,636,600	1,400,000	236,600

Source: Development Teams, GMPA EIS 1994 (NPS 1994a); BAE 1998a

Notes:
gpd = gallons per day
mgd = million gallons per day
[a] Assumes peak flow for typical rainfall year (1.9 mgd) minus 0.5 mgd in-stream flow.
[b] Assumes peak shortfall in June in typical and drier years.
[c] Based on GMPA EIS (NPS 1994a) demand factor for Medical Research land use (10 gpd/employee).
[d] Includes 14,000 gpd of gray water used for irrigation (see Table 13).
[e] Includes 12,250 gpd of gray water used for irrigation (see Table 13).
[f] Includes 11,781 gpd of gray water used for irrigation (see Table 13).
[g] Includes 8,197 gpd of recycled storm water used for irrigation (see Table 13).
[h] Based on office demand factor of 30 gpd/employee (BAE 1998a).

Table 13
Domestic and Irrigation Water Consumption (gpd)

	MEDICAL RESEARCH	OFFICE	INN	CONFERENCE CENTER	FITNESS/FOOD SERVICE/DAY CARE	ASSISTED LIVING	RESIDENTIAL	IRRIGATION	TOTAL
Alt. 1	9,700							10,562[a]	20,262
Alt. 2		21,360	17,870				58,050	14,000[b]	111,280
Alt. 3		21,600		4,000		13,200	16,800	12,250[b]	67,850
Alt. 4		19,178					32,877	11,781[b]	63,836
Alt. 5		33,750			17,925			20,548[c]	72,223
Alt. 6		24,836						10,562[a]	35,398

Source: Development Teams; BAE.

Notes:
gpd = gallons per day
[a] Assumes potable water as primary water source for irrigation.
[b] Assumes gray water as primary water source for irrigation.
[c] Includes 12,351 gpd of potable water and 8,197 gpd of recycled storm water as primary water sources for irrigation.

Table 14
Public School Enrollment

	PRESIDIO HOUSEHOLDS[a]	TOTAL HOUSEHOLD POPULATION GENERATED BY ALTERNATIVE[b]	SCHOOL-AGED CHILDREN GENERATED BY ALTERNATIVE[c]	ESTIMATED PRIMARY/SECONDARY PUBLIC SCHOOL ENROLLMENT[d]	PRESIDIO PUBLIC SCHOOL GENERATION FACTOR[e]
Alt. 1	227	726	125	92	0.40
Alt. 2	627	2,006	345	253	0.40
Alt. 3	227	726	125	92	0.40
Alt. 4	677	2,166	372	273	0.40
Alt. 5	227	726	125	92	0.40
Alt. 6	227	726	125	92	0.40

Source: NPS 1994a; BAE.

Notes:
[a] Proportionate share of total existing Presidio housing units allocated to each alternative plus any new housing units added by the alternative. Does not include units in former barracks.
[b] Average Presidio household size, 3.2 persons per household, is based on the average household size for San Francisco (BAE).
[c] The proportion of schoolchildren in relation to total population in the nine-County San Francisco Bay Area is 17.19% (BAE).
[d] The proportion of schoolchildren enrolled in public school to total school-aged population in San Francisco is 73.36% (BAE).
[e] Number of Presidio schoolchildren expected to enroll in public school per housing unit.

Table 15
Regional Housing Demand

ESTIMATES OF NET NEW REGIONAL HOUSING DEMAND

	TOTAL EMPLOYMENT GENERATED BY ALTERNATIVE	NEW HOUSING DEMAND FROM OUTSIDE SAN FRANCISCO BAY AREA	PRESIDIO HOUSING UNITS ALLOCATED TO LAMC/LAIR PLUS NEW HOUSING	PERCENT OF HOUSING DEMAND GENERATED BY ALTERNATIVE MET AT PRESIDIO
Alt. 1	970	187	265	100%
Alt. 2	2,000	385	665	100%
Alt. 3	2,000	385	265	69%
Alt. 4	2,400	462	715	100%
Alt. 5	2,500	481	265	55%
Alt. 6	828	159	265	100%

ALLOCATION OF NET NEW REGIONAL DEMAND TO SAN FRANCISCO BAY AREA SUB-REGIONS

	NET NEW REGIONAL HOUSING DEMAND FROM ALTERNATIVE	55% OF TOTAL NEW SAN FRANCISCO HOUSING DEMAND	17% OF TOTAL NEW NORTH BAY HOUSING DEMAND	8% OF TOTAL NEW PENINSULA HOUSING DEMAND	20% OF TOTAL NEW EAST BAY HOUSING DEMAND
Alt. 1	n/a	n/a	n/a	n/a	n/a
Alt. 2	n/a	n/a	n/a	n/a	n/a
Alt. 3	120	66	20	10	24
Alt. 4	n/a	n/a	n/a	n/a	n/a
Alt. 5	216	119	37	17	43
Alt. 6	n/a	n/a	n/a	n/a	n/a

NET NEW HOUSING DEMAND AS PERCENTAGE OF VACANT REGIONAL HOUSING

	PERCENT OF CURRENT SAN FRANCISCO VACANCY	PERCENT OF CURRENT NORTH BAY VACANCY	PERCENT OF CURRENT PENINSULA VACANCY	PERCENT OF CURRENT EAST BAY VACANCY
Alt. 1	n/a	n/a	n/a	n/a
Alt. 2	n/a	n/a	n/a	n/a
Alt. 3	0.28%	0.09%	0.03%	0.05%
Alt. 4	n/a	n/a	n/a	n/a
Alt. 5	0.50%	0.17%	0.05%	0.09%
Alt. 6	n/a	n/a	n/a	n/a

ESTIMATE OF NEW REGIONAL HOUSING CONSTRUCTION

San Francisco Bay Area Housing Units 2000	2,429,230
San Francisco Bay Area Housing Units 2010	2,655,100
Net New Housing Units	225,870

Sources: Development Teams; Presidio Trust 1998d, 1998e; NPS 1994a; California Department of Finance; ABAG; BAE.

Notes:
n/a = not applicable
Vacancy rate is derived by the State Department of Finance using the 1990 Census and recent utility billing records. Because this estimate considers seasonal and condemned units "vacant," total vacant units may be overstated.

Table 16
Weekday External and Internal Trips and Parking Demand

	DAILY					p.m. PEAK HOUR					
	PERSON TRIPS					PERSON TRIPS					
	AUTO	TRANSIT	BIKE/PED	TOTAL	VEHICLE TRIPS	AUTO	TRANSIT	BIKE/PED	TOTAL	VEHICLE TRIPS	WEEKDAY PARKING DEMAND (SPACES)
Alternative 1											1,320
External	6,380	1,370	1,370	9,120	4,560	670	140	140	950	490	
Internal	1,220	490	730	2,440	870	100	40	60	200	70	
Alternative 2											1,110
External	5,990	1,280	1,280	8,550	4,280	710	150	150	1,010	520	
Internal	880	350	530	1,760	630	140	60	80	280	100	
Alternative 3											1,280
External	6,130	1,310	1,310	8,750	4,460	600	130	130	860	430	
Internal	890	360	530	1,780	640	90	40	50	180	60	
Alternative 4											1,160
External	7,200	1,540	1,540	10,280	5,140	840	180	180	1,200	600	
Internal	940	380	570	1,890	670	150	60	90	300	110	
Alternative 5											1,440
External	6,120	1,310	1,310	8,740	4,360	570	120	120	810	400	
Internal	770	310	460	1,540	550	70	30	40	140	50	
Alternative 6											580
External	2,730	590	590	3,910	1,960	290	60	60	410	220	
Internal	340	140	210	690	250	40	10	20	70	30	

Source: Wilbur Smith Associates

Note: Internal trips are trips made between the Letterman Complex and other parts of the Presidio or within the Letterman Complex. External trips are made between the Letterman Complex and areas outside the Presidio. Trip generation assumptions are provided in Appendix D.

Table 17
2010 P.M. Peak Hour Traffic Volumes at the Gates to the Presidio

	EXISTING[b] CONDITIONS	PERCENT CONTRIBUTION OF ALTERNATIVE TO TRAFFIC GROWTH[a] (2010)											
		ALTERNATIVE 1		ALTERNATIVE 2		ALTERNATIVE 3		ALTERNATIVE 4		ALTERNATIVE 5		ALTERNATIVE 6	
	vph	vph	%	vph	%	vph	%	vph	%	vph	%	vph	%
Mason Street	610	960	14	970	17	960	11	980	16	960	12	940	9
Gorgas Avenue	280	790	61	820	63	770	57	880	65	750	55	580	30
Lombard Street	1,170	1,570	13	1,570	13	1,570	10	1,580	14	1,560	10	1,560	10
Presidio Boulevard	720	940	36	940	32	930	33	950	40	930	29	920	30
Arguello Boulevard	490	1,000	0	1,000	0	1,000	0	1,000	0	1,000	0	1,000	0
15th Avenue	130	300	0	300	0	300	0	300	0	300	0	300	0
Lincoln Boulevard	860	1,360	0	1,360	0	1,360	0	1,360	0	1,360	0	1,360	0
Golden Gate Plaza	750	1,190	0	1,190	0	1,190	0	1,190	0	1,190	0	1,190	0

Source: Wilbur Smith Associates

Notes:
vph = vehicles per hour — p.m. peak hour volume
[a]Percent contribution of alternative-generated traffic to the growth in traffic volumes between existing and 2010 conditions.
[b]NPS 1994b. Gorgas Avenue Gate traffic was reduced to reflect the discontinued use of LAMC. Traffic volume for the Gorgas Avenue Gate was taken from the Presidio Trust (1998f).

Table 18
2010 Weekday p.m. Peak-Hour Levels of Service

	ALTERNATIVE 1			ALTERNATIVE 2			ALTERNATIVE 3			ALTERNATIVE 4			ALTERNATIVE 5			ALTERNATIVE 6		
INTERSECTION	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C
Proposed Richardson/Gorgas Access	---	---	---	B	7	0.72	B	7	0.73	B	7	0.73	B	7	0.73	---	---	---
Lyon/Richardson/Gorgas	D	31	0.99	A	2	0.85	A	2	0.85	A	2	0.85	A	2	0.85	---	---	---
Francisco/Gorgas/Lyon	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	C	5	
Richardson/Francisco	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	B	12	0.86
Lombard/Lyon	F	199	1.74	F	196	1.74	F	193	1.73	F	203	1.75	F	193	1.73	F	190	1.73
Presidio/Lombard	E	33	1.33	E	38	1.37	E	33	1.33	E	39	1.37	E	31	1.32	D	28	1.29
Presidio/Letterman/Lincoln	C	16	1.25	C	17	1.31	C	16	1.23	C	18	1.33	C	16	1.21	C	15	1.16
Mason/Marina/Lyon[a]	C	1		C	1		C	1		C	1		C	1		C	1	
Doyle/Marina/Lyon	C	17	0.96	C	17	0.96	C	17	0.96	C	18	0.96	C	17	0.96	C	16	0.95

Source: Wilbur Smith Associates

Notes:
LOS = Level of Service
LOS A: Insignificant Delays. Progression is extremely favorable, and most vehicles arrive during the green phase. Most vehicles do not stop at all.
LOS B: Minimal Delays. Generally good progression, short cycle lengths, or both. More vehicles stop than with LOS A, causing higher levels of average delay. Drivers begin to feel restricted.
LOS C: Acceptable Delays. Fair progression, longer cycle lengths, or both. Individual cycle failures may begin to appear, though many still pass through the intersection without stopping. Most drivers feel somewhat restricted.
LOS D: Tolerable Delays. The influence of congestion becomes more noticeable. Longer delays may result from some combination of unfavorable progression, long cycle lengths, or high v/c ratios. Many vehicles stop, and the proportion of vehicles not stopping declines. Individual cycle failures are noticeable. Queues may develop but dissipate rapidly, without excessive delays.
LOS E: Significant Delays. Considered by many agencies to be the limit of acceptable delay. These high delay values generally indicate poor progression, long cycle lengths, and high v/c ratios. Individual cycle failures are frequent occurrences. Vehicles may wait through several signal cycles and long queues of vehicles form upstream.
LOS F: Excessive Delays. Considered to be unacceptable to most drivers. Often occurs with oversaturation, that is, when arrival flow rates exceed the capacity of the intersection. Poor progression and long cycle lengths may also be major contributing causes to such delay levels. Queues may block upstream intersections.
Delay = Average seconds of delay per vehicle.
v/c = critical volume-to-capacity ratio.
Alternative 1 roadway configuration assumes a single-intersection reconfiguration of the intersection near the Gorgas Avenue Gate.
Alternative 2, 3, 4, and 5 roadway configurations assume a two-intersection reconfiguration of the intersection near the Gorgas Avenue Gate.
Alternative 6 roadway configuration assumes the existing intersection configuration near the Gorgas Avenue Gate.
[a] Delay represents average delay for entire intersection; level of service is that of the approach with the greatest delay.
--- = Intersection not affected by alternative.

Table 19
Cumulative p.m. Peak-Hour Vehicle Trip Generation

PROJECT		ALTERNATIVE 1	2	3	4	5	6
Letterman Complex	External	490	520	430	600	400	220
	Internal	70	100	60	110	50	30
15 Historic Buildings (Main Post)	External	370	370	370	370	370	370
	Internal	170	170	170	170	170	170
Public Health Service Hospital Complex	External	160	160	160	160	160	160
	Internal	280	280	280	280	280	280
Two Playing Fields: Morton Street (East Housing Area) and Paul Goode (North of Julius Kahn Playground)	External	20	20	20	20	20	20
	Internal	0	0	0	0	0	0
Presidio Housing (Presidio-Wide)	External	300	300	300	300	300	300
	Internal	220	220	220	220	220	220
Water Reclamation Plant (Letterman Complex)	External	0	0	0	0	0	0
	Internal	0	0	0	0	0	0
Crissy Field	External	60	60	60	60	60	60
	Internal	0	0	0	0	0	0
William Penn Mott, Jr. Visitor Center (Building 102, Main Post)	External	20	20	20	20	20	20
	Internal	0	0	0	0	0	0
Exploratorium	External	50	50	50	50	50	50
	Internal	0	0	0	0	0	0
2361 Lombard Street 126-Room Hotel[a]	External	-10	-10	-10	-10	-10	-10
	Internal	0	0	0	0	0	0
1880 Lombard Street Residential Building w/ 27 Units plus 11,000 sf Commercial (Marina District)[a]	External	-100	-100	-100	-100	-100	-100
	Internal	0	0	0	0	0	0
Electronic Toll Collection (Golden Gate Bridge)[b]	External	0	0	0	0	0	0
	Internal	0	0	0	0	0	0
Total	External	1,360	1,390	1,300	1,470	1,270	1,090
	Internal	740	770	730	780	720	700
Percentage Contributed by Letterman Complex to Total Added Cumulative Traffic		27	29	24	32	23	14

Source: Wilbur Smith Associates 1999.
Notes:
External trips are defined as trips between a location within the Presidio and a location outside the Presidio's boundaries. Internal trips are defined as trips made between two locations within the Presidio.
[a] In order to provide a conservative analysis, the reduction of vehicle p.m. peak hour vehicle trips resulting from these projects has not been incorporated into the level of service analysis.
[b] Electronic Toll Collection may increase traffic volume on Richardson Avenue during the a.m. peak hour, but would not cause an increase in p.m. peak-hour traffic volumes on Richardson Avenue.

Table 20
Cumulative p.m. Peak-Hour Levels of Service

	ALTERNATIVE 1			ALTERNATIVE 2			ALTERNATIVE 3			ALTERNATIVE 4			ALTERNATIVE 5			ALTERNATIVE 6		
INTERSECTION	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C	LOS	DELAY	V/C
Francisco/Gorgas/Lyon	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	B	3.8	---
Richardson/Francisco	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	B	9.5	0.74
Richardson/Lyon (single reconfigured intersection)	D	37.2	0.88	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Richardson/Lyon (two reconfigured intersections)	---	---	---	A	1.6	0.78	A	1.9	0.78	A	2.2	0.78	A	1.8	0.78	---	---	---
Richardson/Additional Access (two reconfigured intersections)	---	---	---	B	6.1	0.66	B	6.0	0.66	B	6.0	0.66	B	5.9	0.65	---	---	---
Lombard/Lyon	E	33.5	1.16	E	33.0	1.16	E	33.0	1.16	E	34.1	1.17	E	32.9	1.16	E	32.3	1.16
Mitigated	B	7.8	0.52	B	7.8	0.52	B	7.8	0.51	B	7.8	0.52	B	7.8	0.51	B	7.7	0.52
Presidio/Lombard	E	31.5	1.06	E	34.6	1.09	E	30.9	1.06	E	35.9	1.10	D	29.8	1.05	D	26.6	1.02
Mitigated	D	20.3	0.93	D	20.9	0.95	C	19.6	0.93	D	22.3	0.95	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
Presidio/Letterman/Lincoln	B	8.3	0.83	B	8.5	0.88	B	8.1	0.82	B	9.0	0.90	B	7.9	0.80	B	7.3	0.76
Mason/Marina/Lyon[a]	B	1.0		B	1.0		B	1.0		B	1.0		B	1.0		B	1.0	
Doyle/Marina/Lyon	B	7.8	0.79	B	7.6	0.78	B	7.7	0.78	B	7.9	0.79	B	7.7	0.78	B	7.3	0.77

Source: Wilbur Smith Associates 2000

Notes:
LOS = Level of Service
LOS A: Insignificant Delays. Progression is extremely favorable, and most vehicles arrive during the green phase. Most vehicles do not stop at all.
LOS B: Minimal Delays. Generally good progression, short cycle lengths, or both. More vehicles stop than with LOS A, causing higher levels of average delay. Drivers begin to feel restricted.
LOS C: Acceptable Delays. Fair progression, longer cycle lengths, or both. Individual cycle failures may begin to appear, though many still pass through the intersection without stopping. Most drivers feel somewhat restricted.
LOS D: Tolerable Delays. The influence of congestion becomes more noticeable. Longer delays may result from some combination of unfavorable progression, long cycle lengths, or high v/c ratios. Many vehicles stop, and the proportion of vehicles not stopping declines. Individual cycle failures are noticeable. Queues may develop but dissipate rapidly, without excessive delays.
LOS E: Significant Delays. Considered by many agencies to be the limit of acceptable delay. These high delay values generally indicate poor progression, long cycle lengths, and high v/c ratios. Individual cycle failures are frequent occurrences. Vehicles may wait through several signal cycles and long queues of vehicles form upstream.
LOS F: Excessive Delays. Considered to be unacceptable to most drivers. Often occurs with oversaturation, that is, when arrival flow rates exceed the capacity of the intersection. Poor progression and long cycle lengths may also be major contributing causes to such delay levels. Queues may block upstream intersections.
Delay = Average seconds of delay per vehicle.
v/c = critical volume-to-capacity ratio
--- = Intersection not affected by alternative.
Alternative 1 roadway configuration assumes a single-intersection reconfiguration of the intersection near the Gorgas Avenue Gate.
Alternative 2, 3, 4, and 5 roadway configurations assume a two-intersection reconfiguration of the intersection near the Gorgas Avenue Gate.
Alternative 6 roadway configuration assumes the existing intersection configuration near the Gorgas Avenue Gate.
The intersection of Presidio Boulevard/Lombard Street would not require mitigation under Alternatives 5 and 6.
[a] Delay represents average delay for entire intersection; level of service is that of the approach with the greatest delay.

Table 21
Cumulative Parking Demand

PROJECT	ALTERNATIVE 1	2	3	4	5	6
Letterman Complex	1,320	1,110	1,280	1,150	1,440	580
15 Historic Buildings (Main Post)	960	960	960	960	960	960
Public Health Service Hospital Complex	270	270	270	270	270	270
Two Playing Fields: Morton Street (East Housing Area) and Paul Goode (North of Julius Kahn Playground)	80	80	80	80	80	80
Presidio Housing (Presidio-Wide)	1,020	1,020	1,020	1,020	1,020	1,020
Water Reclamation Plant (Letterman Complex)	2	2	2	2	2	2
Crissy Field	100	100	100	100	100	100
William Penn Mott, Jr. Visitor Center (Building 102, Main Post)	10	10	10	10	10	10
Exploratorium	520[a]	520[a]	520[a]	520[a]	520[a]	520[a]
2361 Lombard Street 126-Room Hotel	100[b]	100[b]	100[b]	100[b]	100[b]	100[b]
1880 Lombard Street Residential Building with 27 Units plus 11,000 sf Commercial (Marina District)	50[c]	50[c]	50[c]	50[c]	50[c]	50[c]
Electronic Toll Collection (Golden Gate Bridge)	0	0	0	0	0	0
Total Presidio Parking Demand	4,432	4,222	4,392	4,262	4,552	3,692
Percentage Contributed by Letterman Complex to Total Cumulative Parking Demand	30	26	29	27	32	16

Source: Wilbur Smith Associates
Notes:
[a] Represents projected parking *supply* rather than demand. The proposed supply is subject to negotiation with the Presidio Trust for 210 additional offsite parking spaces (Exploratorium 2000).
[b, c] Represents projected parking *supply* rather than demand. The noted parking supply meets the requirements of the San Francisco Planning Code (CCSF 1999a, 1999b).

Table 22
Estimated Vehicular Emissions from Project-Related Traffic

POLLUTANT (lb/day)	BAAQMD SIGNIFICANCE THRESHOLD	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5	ALTERNATIVE 6
Reactive Organic Gases (ROG)	80	51.7	48.7	48.6	54.8	47.3	21.7
Nitrogen Oxides (NO_x)	80	**88.4**	73.8	74.7	**89.8**	74.1	36.9
Particulate Matter (PM_{10})	80	38.5	31.8	32.1	38.8	31.9	16.1
Carbon Monoxide (CO)	550[a]	634.1	557.1	561.2	670.9	556.4	265.0

Source: EIP Associates. Emission estimates based on use of CARB's URBEMIS7G model.
Notes:
Bold indicates estimated emissions that would exceed BAAQMD significance threshold criteria.
[a] BAAQMD's carbon monoxide screening threshold of 550 lb/day is not a significance threshold. It is an indicator of regional emissions sufficient in quantity to require a localized impact analysis.

4.1.1 Consistency with Approved Plans and Policies

This section discusses the possible conflicts between the alternative and the Presidio goals (General Objectives of the GMPA and purposes of the GGNRA Act) and a number of the more specific goals and planning principles of approved land use plans, including the Presidio GMPA and the *San Francisco General Plan*.

4.1.1.1 GENERAL OBJECTIVES OF THE GMPA AND PURPOSES OF GGNRA ACT

Alternative 1 is consistent with most of the General Objectives of the GMPA, which are identified in Section 1.1.5 of this document. Removal of the LAMC building would be consistent with the General Objective of the GMPA to enhance the scenic resources of the Presidio. Removal of LAMC would also contribute to the General Objective of enhancing the Presidio's cultural resources by assisting in restoring historic settings to permit an understanding of the site's significance to the National Historic Landmark district. It would not, however, contribute to this General Objective of enhancing the Presidio's cultural resources as significantly as would removal of both the LAMC and LAIR buildings because the modern monolithic and non-distinctive architectural style of the existing buildings is inconsistent with the historic setting. Consistent with the General Objective to provide for uses that involve stewardship and sustainability, hand-dismantling and salvaging of materials prior to building demolition and conservation and recycling strategies to be employed within the buildings and by tenants would promote and demonstrate conservation practices, including waste reduction and recycling. Furthermore, in keeping with its history as a center for research and health care, the proposed reuse of the site would involve research, training and educational programs to address the interaction of environment and public health issues, which would be consistent with the GMPA's General Objective concerning appropriate uses.

Alternative 1 is not consistent, however, with the GMPA's General Objective to sustain the Presidio indefinitely on an economic basis as a great national park in an urban setting, because there is no current demand for use of the site for laboratory-based research. During the RFQ process, despite having targeted the solicitation of project proposals to many such organizations and users, no interest was expressed from organizations or companies to build and occupy all of the space at the site for laboratory-based medical research. Failure to develop and to ground lease the 23-acre site consistently with the timing and financial parameters of the FMP, which in the absence of a viable tenant would be the result under this alternative, would significantly impair or prevent the achievement of the Trust Act's self-sufficiency mandate. This result then is inconsistent with the General Objective to sustain the Presidio indefinitely on an economic basis.

Because this alternative was drawn largely from the GMPA's preferred alternative, this alternative is consistent with most of the more specific goals and planning principles of the GMPA. It would implement the specific program proposal in the GMPA for the Letterman Complex to serve as a science and education center devoted to issues of health, life and earth sciences, and would help foster the GMPA's proposed major directions for the future of the Presidio by perpetuating the complex as a building and activity core with a major program center. It would also be consistent with the GMPA's specific planning area concept for the Letterman Complex and the GMPA's proposal to create a national and international center for scientific, research or educational activities.

Alternative 1 is consistent with the purposes of the GGNRA Act, which are identified in Section 1.1.5 of this document. Primarily by focusing more intensive use into an area that has been previously developed, Alternative 1 preserves the recreation area as far as possible in its natural setting. New construction would be subject to sound land use planning, including implementation of the Planning Guidelines and design review, so that it would not degrade scenic views and the natural setting.

4.1.1.2 PRESIDIO GENERAL MANAGEMENT PLAN AMENDMENT

New construction under this alternative would also be consistent with the specific goals and planning principles of the GMPA. New construction could replace the LAMC as permitted under the GMPA should the LAMC not meet essential program and management needs. This alternative would promote the GMPA concept for infill construction within the complex. It would reinforce the historic hospital complex's courtyard and historic patterns of development. The GMPA's maximum allowable square footage for the complex (1.3 million square feet) and maximum allowable height of new construction (60 feet) would not be exceeded by this alternative. Any replacement construction within the 23-acre site would proceed in accordance with the Planning Guidelines (as provided in Appendix B) and design review as recommended within the GMPA to ensure that new construction would be compatible with the adjacent historic buildings and patterns of development.

4.1.1.3 GENERAL PLAN OF THE CITY AND COUNTY OF SAN FRANCISCO

While the Presidio is not subject to the *General Plan*, Alternative 1 would contribute to the *General Plan*'s objective to enhance the city's position as a national and regional center for governmental, health and educational services. Alternative 1 would also be consistent with *General Plan* policies regarding the location of institutional facilities in areas occupied by or reserved for large groups of buildings of a public or a semi-public nature.

4.1.2 Solid Waste

This section discusses the potential impacts on solid waste resulting from demolition of the LAMC building, should the hospital be removed to enhance open space. The following methods were used to predict impacts:

- Estimates of the volume of demolition debris and the volume of onsite materials recycling resulting from deconstruction and demolition of the LAMC building.
- Interviews with potential landfill sites regarding the ability to accept large volumes of demolition waste.
- Review of available data relating to regional solid waste disposal compiled by the State of California.

The following criteria were considered in assessing the degree of impact:

- Whether appropriate landfill sites are available to accept the estimated quantity of debris from onsite demolition activities.
- Whether identified landfill operators are willing and have the capacity to accept the estimated quantity of demolition debris.
- Whether 50 percent or more of the estimated quantity of debris would be diverted to a landfill site.

The LAMC is estimated to contain approximately 35,400 tons of concrete, or 63,000 cubic yards of material.

Three potential scenarios for demolition of the LAMC are currently being explored:

1. *Recycle Concrete Onsite* – This would involve placement of a mobile crushing plant onsite, which would process a significant portion of the estimated 63,000 cubic yards of material. After accounting for onsite recycling, it is estimated that approximately 12,600 cubic yards of material would be hauled to solid waste landfill sites and buried.

2. *Recycling of Concrete Offsite* – This would involve hauling all material offsite for recycling and disposal to one or more appropriate landfill sites. After accounting for offsite recycling, it is estimated that approximately 63,000 cubic yards of material would be hauled to solid waste landfill sites, and that approximately 12,600 cubic yards of material would be buried at those landfill sites.

3. *Disposal of Demolition Materials Offsite* – This would involve hauling all material offsite to one or more appropriate landfill sites. It is estimated that approximately 63,000 cubic yards of material would be buried at those landfill sites, assuming that no onsite or offsite recycling takes place.

For the purposes of this impact assessment only, the analysis focuses on the "worst case" scenario (disposal of demolition materials offsite and no onsite or offsite recycling) and assumes that all debris generated by the demolition of the LAMC would be sent to a landfill and disposed of without recycling. It must be noted that the Presidio Trust is committed to diverting at least 50 percent of the project's demolition waste stream from landfill sites by salvage and reuse in order to promote and demonstrate conservation practices in waste reduction and recycling.

4.1.2.1 DISPOSAL OF DEMOLITION DEBRIS OFFSITE

The 35,400 tons of estimated debris generated under this alternative (assuming no recycling at all) represents just over 0.5 percent of the 6.6 million tons total volume of waste disposed of in the nine-county Bay Area in 1997 (California Integrated Waste Management Board and State Board of Equalization 1997). The impact of disposing this building debris was analyzed with respect to the following solid waste sites located in the Bay Area that are likely to receive the material:

- Redwood Sanitary Landfill in north Marin County
- Altamont Sanitary Landfill in east Alameda County
- Zanker Road Landfill in Santa Clara County

The operator of Redwood Sanitary Landfill in north Marin County and Altamont Sanitary Landfill in east Alameda County indicated that the landfill sites have sufficient capacity to handle the debris (personal communication with Paul Yamamoto, Alameda County Division Manager, Waste Management Inc.). The operator regularly seeks out this type of project, and would expect to crush and recycle a significant amount of the concrete for use in the operation of its landfill sites, as well as for roadway and building construction. If the entire amount were disposed of in Redwood or Altamont landfill without recycling (an action that is highly unlikely to occur), the operator indicated that this would not significantly limit the life of either landfill. In the

case of the Altamont Sanitary Landfill, the total volume of the LAMC debris without recycling would represent just over 2 percent of its annual total tonnage (1997 totals). In the case of Redwood Sanitary Landfill, the 35,400 tons of debris would represent approximately 13 percent of its annual tonnage (1997 totals). Both of these estimates assume no recycling of LAMC demolition debris.

Zanker Road Landfill receives an average of 900 tons of solid waste per day, and is permitted to accept up to 1,300 tons per day (personal communication with Paul Lineberry, Landfill Engineer, Zanker Road Landfill). Although Zanker Road accepts 900 tons of waste per day, an average of only 75 tons per day is buried in the landfill because nearly 90 percent of all solid waste received is recycled through various means. The operator indicated that the LAMC demolition debris would not affect the capacity of the landfill. Should Zanker Road Landfill recycle none of the debris, the 35,400 tons would consume about 4 percent of the landfill's total annual permitted capacity.

Based on these estimates, the debris that is estimated to result from demolition activities under this alternative is considerable, but represents a small portion of the solid waste sent to disposal sites within the Bay Area in one year. Given the responses from various operators of regulated landfill sites within the region, the volume of demolition debris from the LAMC would not adversely affect the capacity of solid waste landfill sites in the Bay Area. Furthermore, to the extent that Presidio Trust conservation goals are implemented and waste reduction and recycling of building debris are instituted at the site, and the receiving landfill(s) implement their standard construction debris waste stream diversion practices, the quantity of debris directed to the landfill sites would be reduced by at least 50 percent. Therefore, demolition of the LAMC is expected to result in a less-than-significant impact on regional solid waste disposal facilities.

4.1.3 Water Supply and Distribution

This section discusses the impacts to the Presidio water supply and distribution system resulting from implementation of this alternative. Information relating to water supply was obtained primarily from the *Lobos Creek Water Resources Management Issues Brief* (BAE 1998a), interviews with Presidio Trust staff and estimates of water consumption provided by the development teams. The following methods were used to predict impacts:

- Identification of land uses at the site.
- Review of development assumptions and resulting population and employment estimates.
- Review of estimates of domestic and irrigation water consumption.

Based on BAE's recent analysis of Presidio water demand and Lobos Creek resources (1998a), the baseline water consumption for the 23-acre site is estimated to be 89,000 gallons per day (gpd).

The following criteria were considered to assess the degree of impact:

- Whether water consumption under the alternative would exceed the total water baseline estimated for the 23-acre site.
- Whether water flows available for fighting fire would meet the requirements of the Uniform Fire Code.
- Whether land uses at the site would contribute to cumulative impacts to the water supply and distribution system at the Presidio, or baseline stream flows maintained in Lobos Creek.

4.1.3.1 IMPACTS OF WATER CONSUMPTION ON BASELINE

Implementation of Alternative 1 is estimated to generate a demand of approximately 20,000 gpd of water (Tables 12 and 13). This estimate assumes establishment of scientific research and education facilities, replacement or infill construction of 503,000 square feet (as a substitute for demolition of LAMC), and maintaining existing landscaping. The estimated water consumption of this alternative is well below the baseline of approximately 89,000 gpd established for the site. Therefore the demand for water under Alternative 1 is not projected to exceed the baseline water consumption. However, as discussed on page 170 of the GMPA EIS (and mitigated on pages 26 and 27 of the document), if water is required for special uses at the LAIR facility of a purity that is not available from onsite sources (a maximum of 10,000 gallons per day), equal amounts of available water from onsite sources would need to be transferred to the city water system or city and Presidio water would need to be mixed to reduce the effect on the city water supply.

4.1.3.2 IMPACTS ON FIRE FLOWS

The GMPA EIS identified deficiencies within the water distribution system resulting in inadequate fire flow throughout most of the Presidio. The analysis of the water system prepared for the NPS that identified such deficiencies led to water system improvement projects carried out by the U.S. Army Corps of Engineers. As a result, the fire flow deficiencies within the Letterman Complex have been corrected and adequate fire flow is available to LAMC/LAIR in their current configuration. Improvements to the water distribution system may be required to ensure adequate fire flow to new development within the Letterman Complex to meet Uniform Fire Code, depending on the characteristics of buildings to be constructed (see mitigation measure WS-1, *Fire Flows*).

4.1.4 Schools

This section discusses the impacts of Alternative 1 as it relates to enrollment of Presidio resident schoolchildren in San Francisco Unified School District schools. The following methods were used to predict impacts:

- Estimation of enrollment in San Francisco public schools generated by housing units associated with the alternative. Housing units associated with each alternative include two categories: 1) the share of existing Presidio housing occupied by the employees of the project; and 2) new housing units proposed in the alternative.
- Review existing estimates of Presidio public school enrollment, and the methodologies used to make such estimates.
- Consultation with SFUSD officials regarding current and future capacity of school sites.

The following assumptions were made to estimate the number of schoolchildren living at the Presidio that would be likely to attend SFUSD schools:

- Employees associated with Alternative 1 are assumed to occupy an allocation of 227 existing Presidio housing units in addition to any new housing proposed in the alternative. The allocation of 227 existing Presidio housing units to each alternative is based on the proportion of Letterman Complex employment assumed in the GMPA to total Presidio-wide employment estimated in the GMPA, or 20 percent of total Presidio-wide employment.
- The proportion of schoolchildren in relation to total population in the nine-county San Francisco Bay Area (17.19 percent), based upon the 1990 U.S. Census, was used to estimate the number of schoolchildren (aged 5 to 18) living at the Presidio.
- This 17.19 percent factor was applied to the expected total population occupying housing units (to determine the total population occupying housing units, 3.2 persons per housing unit was assumed, based on the median household size reported for San Francisco in the 1990 U.S. Census).
- The proportion of city of San Francisco public school enrollment to schoolchildren was used to derive the number of resident Letterman Complex schoolchildren that would likely attend SFUSD schools.

The following criterion was considered to assess the degree of impact:

- Whether the alternative would result in the need for the SFUSD to develop additional capacity at existing or new school sites.

4.1.4.1 IMPACT ON CAPACITY AT EXISTING OR NEW SCHOOL SITES

At full occupancy, Alternative 1 would generate 92 schoolchildren between the ages of 5 and 18 who would enroll in SFUSD schools (Table 14). The SFUSD Education Placement Center, the office responsible for managing enrollment and placing children within SFUSD schools, indicated that children of Presidio residents have commonly attended a number of schools located in the surrounding neighborhoods. Since the transition of the Presidio from the U.S. Army to the NPS and Presidio Trust, enrollment in schools that traditionally served the Presidio has declined significantly. The SFUSD Education Placement Center stated that there is sufficient capacity in the schools surrounding the Presidio, as well as in the SFUSD school system overall, to accommodate the 92 Presidio schoolchildren estimated to enroll in SFUSD schools as a result of Alternative 1 (personal communication with Margaret Wells, Program Director of the Education Placement Center). Because this level of enrollment is within the existing capacity of SFUSD, Alternative 1 would not result in a significant impact on SFUSD schools.

4.1.5 Housing

This section analyzes the potential impacts resulting from changes in housing demand and supply associated with Alternative 1. The methods used to estimate the net new regional demand for housing resulting from the alternative, and to distribute that demand to the Presidio and to the surrounding Bay Area, were based on the

methodology applied in the GMPA *Presidio Planning Socioeconomic Impact Analysis Report* (Jones & Jones 1994). A full description of methods used to analyze housing impacts is presented in Appendix D.

The following criterion was considered to assess the degree of impact:

- Whether the net new regional housing demand would be a significant increase in demand for housing in the city of San Francisco and the surrounding Bay Area.

4.1.5.1 INCREASE IN HOUSING DEMAND

At buildout, the additional regional housing demand created by employment associated with Alternative 1 would be 187 housing units (Table 15). The Presidio housing stock available to this alternative would meet 100 percent of this housing demand. Because the housing demand under Alternative 1 generated by new employees from outside the Bay Area can be accommodated at the Presidio, this alternative would not have a significant impact on the housing market within the city of San Francisco and the surrounding Bay Area.

4.1.6 Medical Research

This section discusses the impact of the alternative on medical and life science research in the Bay Area. The following methods were used to predict impacts:

- Review of medical research space needs in the Bay Area.
- Review of past actions by the NPS and the Presidio Trust to help satisfy those needs.
- Evaluation of existing reports related to the condition and suitability of the LAMC and LAIR for medical research use.

The following criterion was considered to assess the degree of impact:

- Whether conversion of the site from medical research to alternative uses would negatively affect medical research in the Bay Area.

4.1.6.1 IMPACT ON MEDICAL RESEARCH

Under Alternative 1, the LAMC could be rehabilitated or rebuilt for research space, or removed, to restore open space and the LAIR would be leased to a tenant or tenants for reuse as a research facility. Thus, the alternative would have a positive impact on medical and life science research by providing research space.

4.1.7 Traffic and Transportation Systems

The following analysis of transportation impacts is based on information included in the 1994 *Presidio Transportation Planning and Analysis Technical Report* (NPS 1994b) as updated for the current EIS. The methodologies used in the traffic impact analysis are summarized below and are more fully described in Appendix D and the *Letterman Complex Transportation Technical Report* (Wilbur Smith Associates 1999).

Analytical Approach – The analytical approach for the traffic impact analysis includes a cumulative impact assessment for 2010 that takes into account the growth expected at the Letterman Complex and growth forecast for the rest of the Presidio and adjacent areas. Future traffic conditions were developed based on the travel demand estimated within the GMPA EIS (Alternative A), subtracting traffic generated by new development within the 23-acre site. Traffic volumes at the analysis locations under the GMPA were then modified to incorporate the vehicle trips generated by the land uses proposed for the Letterman Complex for each alternative currently under consideration, primarily using San Francisco *Guidelines for Environmental Review* (City and County of San Francisco 1991). In addition, adjustments were made to reflect the recent conversion of the O'Reilly housing to office use, a change from the GMPA.

Some of the trips that would be generated by the land uses for each alternative were assumed to begin and end within the Presidio (internal trips), while the remaining trips would be made between the Letterman Complex and areas outside of the Presidio (external trips). The expected mode split for external trips is 70 percent automobile, 15 percent transit and 15 percent pedestrian and bicycle usage. Internal trips would be more likely to made with non-automobile modes than trips originating or ending outside the Presidio. The mode split for internal trips was estimated to be 50 percent automobile, 20 percent transit, and 30 percent pedestrian or bicycle trips.

The parking demand of each alternative was based on the work/visitor split of automobile trips as described in the San Francisco *Guidelines for Environmental Review* (City and County of San Francisco 1991). Work-related automobile trips were assumed to require a parking space all day, and were developed based on estimates of the number of square feet per employee and mode split. Visitor automobile trips were developed based on the number of daily visitor vehicle trips divided by an average turnover rate for each land use.

Table 16 presents the number of weekday external and internal trips generated by the 23-acre site by mode, as well as the total weekday parking demand for each alternative. Table 17 presents the total 2010 traffic volumes at the gates to the Presidio (including trips generated by the new development within the site as well as the rest of the Presidio, and pass-through traffic).

Under Alternative 1, it was assumed that the existing roadway network within the Letterman Complex would be maintained. Improvements to the intersection(s) of Lyon Street/Richardson Avenue/Gorgas Avenue would allow for left turns into the Letterman Complex from westbound Richardson Avenue. The Gorgas Avenue Gate would be the primary entrance, with the Lombard Street Gate serving as a secondary entrance. Alternative 1 would also include improvements to the pedestrian and bicycle circulation network within the complex, as well as improved connections to adjacent areas. A total of 1,150 surface parking spaces would be available to serve the development.

Transportation Demand Management Program – The transportation demand estimates assume the implementation of a Transportation Demand Management (TDM) program that would include improved transit, pedestrian and bicycle conditions, and would reduce the automobile usage to the Letterman Complex. The travel demand management strategies that are assumed to be common for all alternatives include:

- Clean-fuel shuttle bus serving the Letterman Complex and the remainder of the Presidio.

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

Transportation Network – Traffic traveling to and from the Letterman Complex would most substantially affect traffic operations at those Presidio gates and intersections nearest the Letterman Complex. Analysis intersections include:

- Lombard Street/Lyon Street.
- Mason Street/Marina Boulevard/Lyon Street.
- Richardson Avenue/Francisco Street/Gorgas Avenue.
- Lombard Street/Presidio Boulevard.
- Presidio Boulevard/Letterman Drive/Lincoln Boulevard.

The combination of traffic traveling to and from other land uses in the Presidio and "pass-through" traffic traveling between the Presidio and the Lombard Street Gate creates heavy traffic volumes at the gate. The large volume of traffic traveling on Lombard Street affects the unsignalized intersection of Lombard and Lyon streets and the internal unsignalized intersection of Lombard Street and Presidio Boulevard.

To reflect the extremely limited capacity of the left-turn movement into the Presidio from Lombard Street at the intersection of Lombard Street and Richardson Avenue, the GMPA proposed a reconfigured version of the intersection of Lyon Street/Richardson Avenue/Gorgas Avenue that would allow left turns into and out of the Presidio at the Gorgas Avenue Gate. The single intersection reconfiguration was analyzed within the GMPA EIS and again as part of the current analysis for Alternative 1. The latter analysis indicated that with the provision of left turns at a single reconfigured intersection, this intersection would operate acceptably during the p.m. peak hour, but would fail during the a.m. peak commute hour when heavy northbound left turns into the Letterman Complex would conflict with heavy southbound traffic on Richardson Avenue and left turns to Richardson Avenue from Gorgas Avenue. Consequently, the current analysis considered a second reconfiguration that would locate left turns to Richardson Avenue from Gorgas Avenue at a separate intersection from left turns from Gorgas Avenue to Richardson Avenue, enabling a two-phase, rather than a three-phase, signal operation. Thus, the two-intersection configuration was incorporated as a part of Alternatives 2, 3, 4 and 5 (Figure 15). Alternative 6, the No Action Alternative, would not include any changes to intersections or roadways in the area.

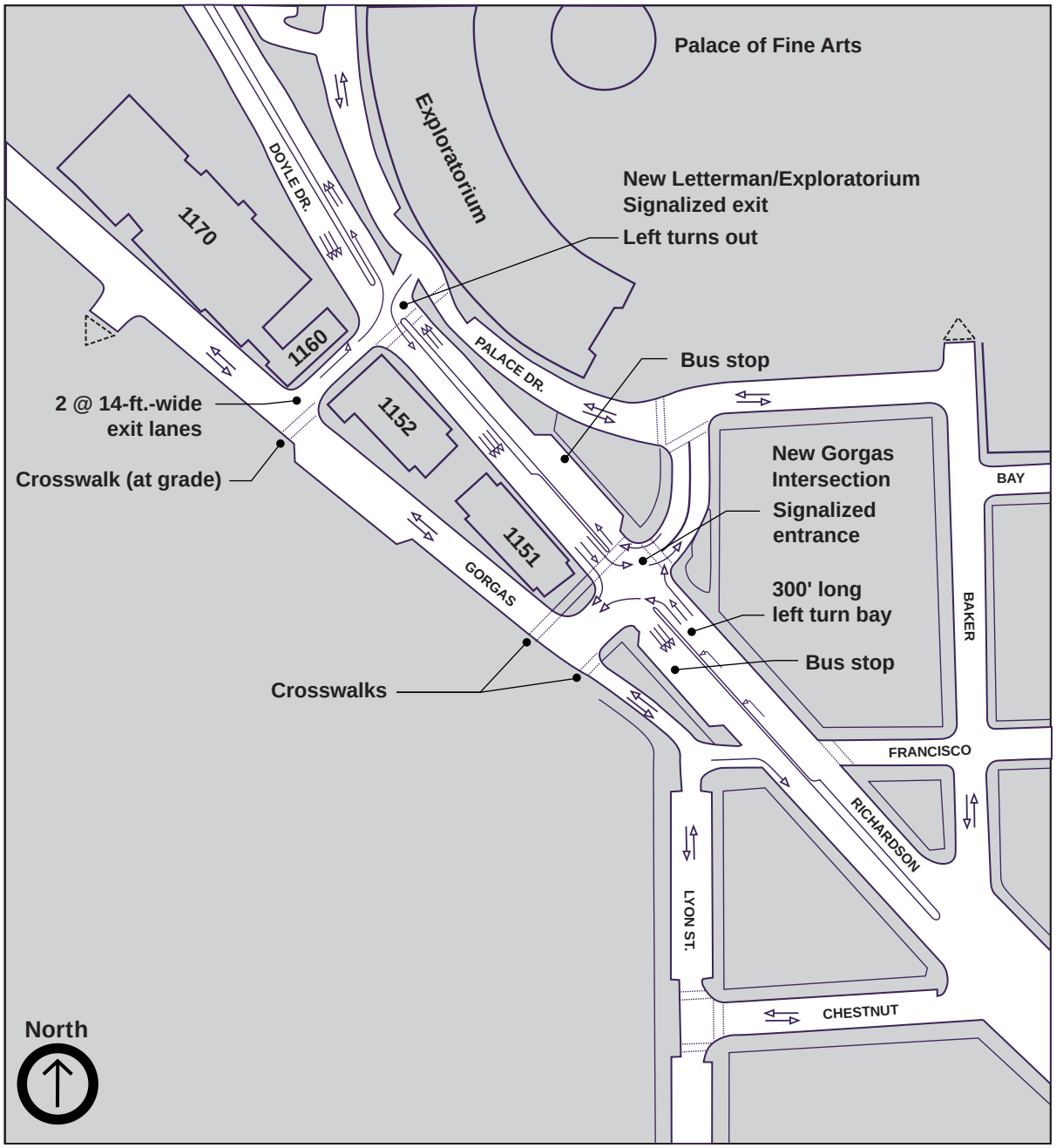


Figure 15.
Reconfigured Intersection at Gorgas Avenue Gate

Provision of the proposed new Richardson Avenue intersections would enable the Gorgas Avenue Gate to accommodate two-thirds of the traffic traveling to and from the Letterman Complex. However, overall traffic growth resulting from new development within the Letterman Complex and elsewhere in the Presidio would still require intersection improvements at the intersection of Lombard and Lyon streets and the intersection of Lombard Street and Presidio Boulevard. Table 18 summarizes the intersection level of service analysis for the six alternatives.

Parking Supply – The number of parking spaces that would be provided for each of the six alternatives would vary. Under Alternative 1, the 23-acre site was estimated to have a share of the 1,570-space parking supply for the 60-acre Letterman Complex that was proportional to the 23-acre site's share of developed area for the entire complex, or 1,150 spaces. Alternatives 2 through 5 were assumed to have a parking supply consistent with the number of parking spaces proposed by each of the development teams. Under Alternative 6, the existing 770 parking spaces surrounding the 23-acre site would remain, and no additional parking would be provided.

Implications of Doyle Drive Reconstruction – A number of studies have been conducted by the City and County of San Francisco and Caltrans on the need for reconstructing Doyle Drive. These efforts include the Doyle Drive Task Force study, prepared in 1991, a Caltrans Project Study Report (Caltrans 1993) and the *Doyle Drive Intermodal Study* (San Francisco Guideway Associates 1996), which identified needs, and developed design alternatives and preliminary cost estimates for the reconstruction of Doyle Drive. Preliminary concepts include the replacement of the current structure with a parkway built to Caltrans standards that would provide direct vehicular access to the Presidio. In addition, multimodal access into and out of the Presidio was proposed through a "transit center" that would be accessed by Golden Gate Transit, MUNI and the Presidio internal shuttle. In December 1999, the San Francisco Transportation Authority began a study involving preparation of an EIS/EIR and preliminary engineering and design documents representing 30 percent design completion. The current schedule calls for completion of the study in the third quarter of 2001.

The reconstruction of Doyle Drive and the provision of new access to the Presidio would affect the transportation conditions within and in the vicinity of the Presidio. A new interchange providing access from Doyle Drive into the Presidio would allow for a more direct connection to the Letterman Complex, and would divert some vehicles from using the Lombard Street and Gorgas Avenue gates. Reconstruction of Doyle Drive may also impact existing connections between Crissy Field and the remainder of the Presidio. Because it is likely that substantial development of the alternatives would occur prior to reconstruction of Doyle Drive, the current analysis does not assume any changes to Doyle Drive.

Impact Assessment Criteria – The following criteria were considered in assessing the degree of transportation impacts:

- Whether the alternative would exceed, either individually or cumulatively, LOS D at intersections.
- Whether the alternative would exceed existing transit capacity.
- Whether the alternative would result in hazards or barriers to pedestrians and bicyclists.
- Whether the alternative would result in inadequate parking supply (i.e., demand greater than future available supply).

- Whether the alternative would result in excessive parking supply which would compromise the TDM strategies designed to encourage non-automobile modes, and potentially result in an increase in vehicle trips to the site.

4.1.7.1 ADDITIONAL TRAFFIC VOLUMES

Alternative 1 would generate 4,560 external (i.e., to areas outside the Presidio) weekday daily vehicle-trips, and 490 vehicle-trips during the p.m. peak hour (Table 16). Of the 490 p.m. peak-hour vehicle-trips generated by Alternative 1, the majority would be outbound (380 vehicles) from the Letterman Complex, while 110 vehicles would be inbound

Overall, the Mason Street Gate would experience an increase of 350 vehicles during the p.m. peak hour from the existing conditions, with Alternative 1 comprising 14 percent of this increase. Alternative 1 would contribute the majority of the increase in traffic volume at the Gorgas Avenue Gate. The existing p.m. peak-hour traffic volume at this gate would increase by 510 vehicles, with the alternative comprising 61 percent of this growth. The existing traffic volume at the Lombard Street Gate would be increased by 400 vehicles during the p.m. peak hour, and 13 percent of this increase would be due to the new development within the complex. The existing p.m. peak-hour traffic at the Presidio Boulevard Gate would increase by 220 vehicles, with Alternative 1 contributing up to 36 percent of the increase (Table 17).

4.1.7.2 IMPACTS ON INTERSECTION OPERATING CONDITIONS

Currently, during the p.m. peak hour, two of the study intersections operate at LOS C, four intersections operate at LOS B, and one intersection operates at LOS A (Table 4). Under Alternative 1, three of the study intersections (Presidio Boulevard/Letterman Drive/Lincoln Boulevard, Mason Street/Marina Boulevard/Lyon Street and Doyle Drive/Marina Boulevard/Lyon Street) would operate acceptably at LOS C during the p.m. peak hour (Table 18). Three of the five studied intersections (Lyon Street/Richardson Avenue/Gorgas Avenue, Lombard Street/Lyon Street and Presidio Boulevard/Lombard Street) on the boundary or within several blocks of the Presidio would fail (have LOS D or worse) under Alternative 1 during the p.m. peak hour (Table 18). The poor operating conditions at these intersections reflect the increase in traffic volumes traveling to and from the Letterman Complex and other land uses at the Presidio via Lombard Street and Richardson Avenue.

The following intersection improvements as described in mitigation measures TR-1, *Lyon Street/Richardson Avenue/Gorgas Avenue Intersection Improvements*, TR-2, *Lombard Street/Lyon Street Intersection Improvements*, and TR-3, *Lombard Street/Presidio Boulevard Intersection Improvements*, and illustrated in Figures 15 through 17 would improve the operating conditions at the intersections to acceptable levels of service:

- *Lyon Street/Richardson Avenue/Gorgas Avenue Intersection Improvements* – Prior to reuse of the site, the intersection would be reconfigured to provide left turns from Richardson Avenue to Gorgas Avenue and left turns from Gorgas Avenue to Richardson Avenue at two separate intersections (Figure 15). These improvements would mitigate the a.m. peak-hour operation of the intersection of Lyon Street and Richardson Avenue from LOS F to LOS D under 2010 conditions.
- *Lombard Street/Lyon Street Intersection Improvements* – Prior to reuse of the site, the intersection would be signalized and the one-lane eastbound approach would be restriped to provide one left-turn lane and one

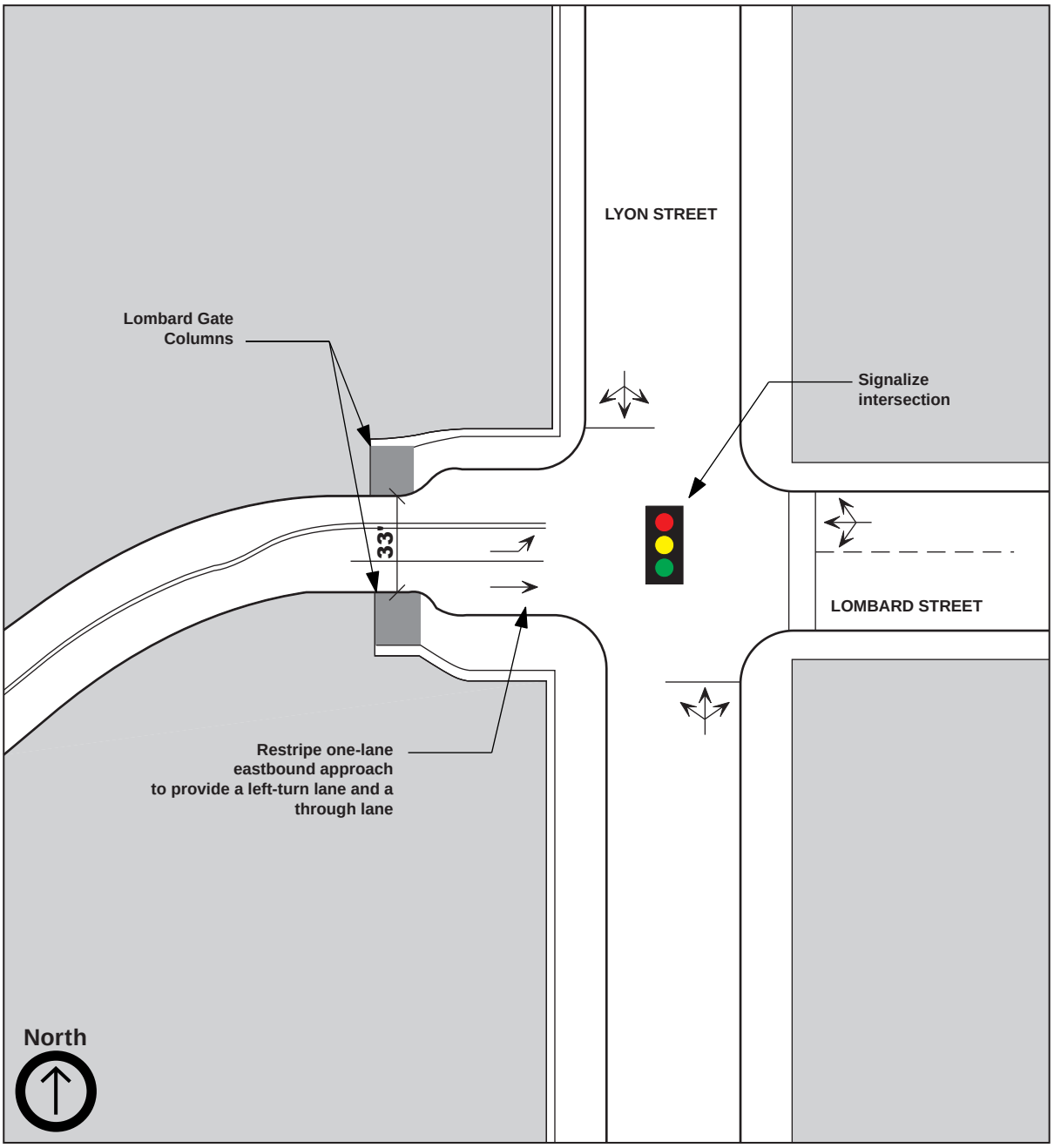


Figure 16.
Proposed Mitigation Measure
for Lombard/Lyon Intersection

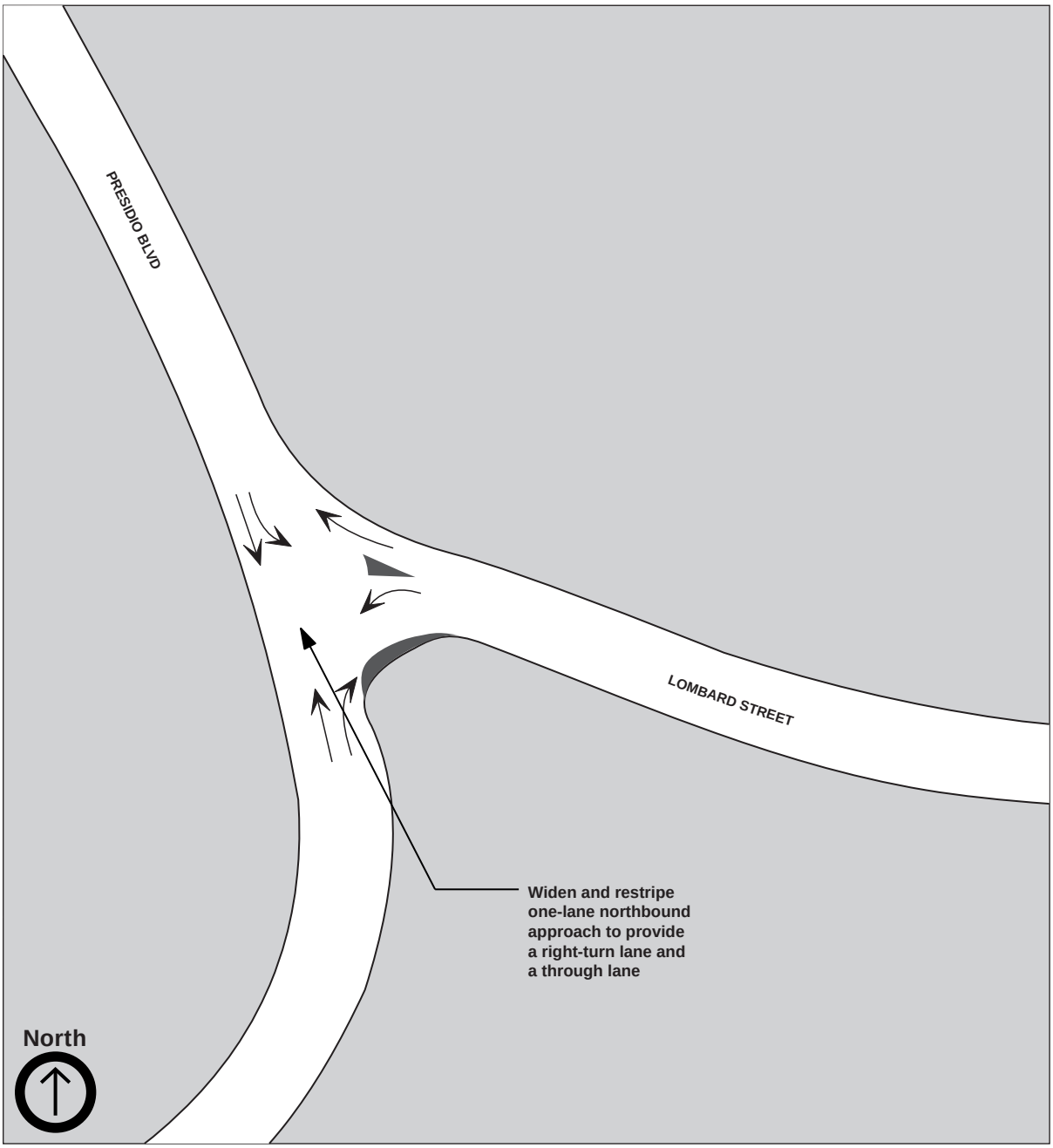


Figure 17.
Proposed Mitigation Measure for Lombard/Presidio Intersection

- shared right-through lane (Figure 16). These improvements would mitigate the p.m. peak-hour operation of the intersection of Lombard and Lyon streets from LOS F to LOS B under 2010 conditions.
- *Lombard Street/Presidio Boulevard Intersection Improvements* – When LOS E conditions are reached, the one-lane northbound approach would be widened and restriped to provide one right-turn lane and one through lane (Figure 17). These improvements would improve the operation of the intersection from LOS E to LOS D during the p.m. peak hour.

4.1.7.3 INCREASED PARKING DEMAND

The parking demand of 1,320 parking spaces for Alternative 1 would exceed the proposed supply of 1,150 spaces, resulting in a shortfall of 170 spaces. In order to ensure that the shortfall does not result in employees or visitors seeking parking outside of the Letterman Complex, major tenants would need to develop additional TDM strategies to demonstrate that parking demand would be reduced by at least 170 spaces, or the parking supply would need to be increased to 1,320 spaces. In addition, parking management strategies would be developed to ensure that the parking supply and demand is balanced within a broader area that includes the Letterman Complex and adjacent areas within the Presidio. Mitigation measures TR-4, *Monitoring of Parking* and TR-8, *Transportation Demand Management Program* would ensure that planned parking management and the development or expansion of TDM strategies would reduce parking demand both within and outside the 23-acre site. These mitigation measures would ensure no significant impacts to parking in Area A and adjacent neighborhoods. As shown on Table D-11 in Appendix D, weekend parking demand would be only 27 percent of weekday demand, therefore substantial parking would be available for recreational uses on weekends.

4.1.7.4 IMPACTS ON PEDESTRIAN AND BICYCLE FACILITIES

With new development occurring within the Letterman Complex, the number of pedestrian and bicycle trips would substantially increase in the vicinity of the complex. Based on the assumed 30 percent and 15 percent bicycle and pedestrian mode share for internal and external trips, respectively, there would be an increase of about 200 new pedestrian and bicycle trips during the p.m. peak hour. These new pedestrian trips would be accommodated within the existing pedestrian paths between the Letterman Complex and key gates of the Presidio as well as on sidewalks that would be constructed as part of the development. The provision of additional pedestrian paths would connect the Letterman Complex with other parts of the Presidio. The existing bicycle network would also accommodate the expected increase in bicycle trips. Furthermore, planned improvements at the complex as called for in the GMPA would enhance the pedestrian and bicycle environment.

The reconfiguration of the Lyon Street/Richardson Avenue/Gorgas Avenue intersection (mitigation measure TR-1) would remove the traffic signal at the intersection of Richardson Avenue and Francisco Street, and would result in a disconnect in the citywide bicycle route network. Relocating a portion of the city's bike route 4 from Francisco Street to Chestnut Street as required by mitigation measure TR-6 and shown in Figure 18 would reestablish this connection with no significant adverse impact on bicyclists.

Implementation of recommended vehicular capacity improvements at the Lombard Street Gate may require adjustment of routes and physical improvements to facilitate access for bicycles currently entering the Presidio via the city's bike route 4 (relocated to Chestnut Street, see mitigation measure TR-6) and bike route 6

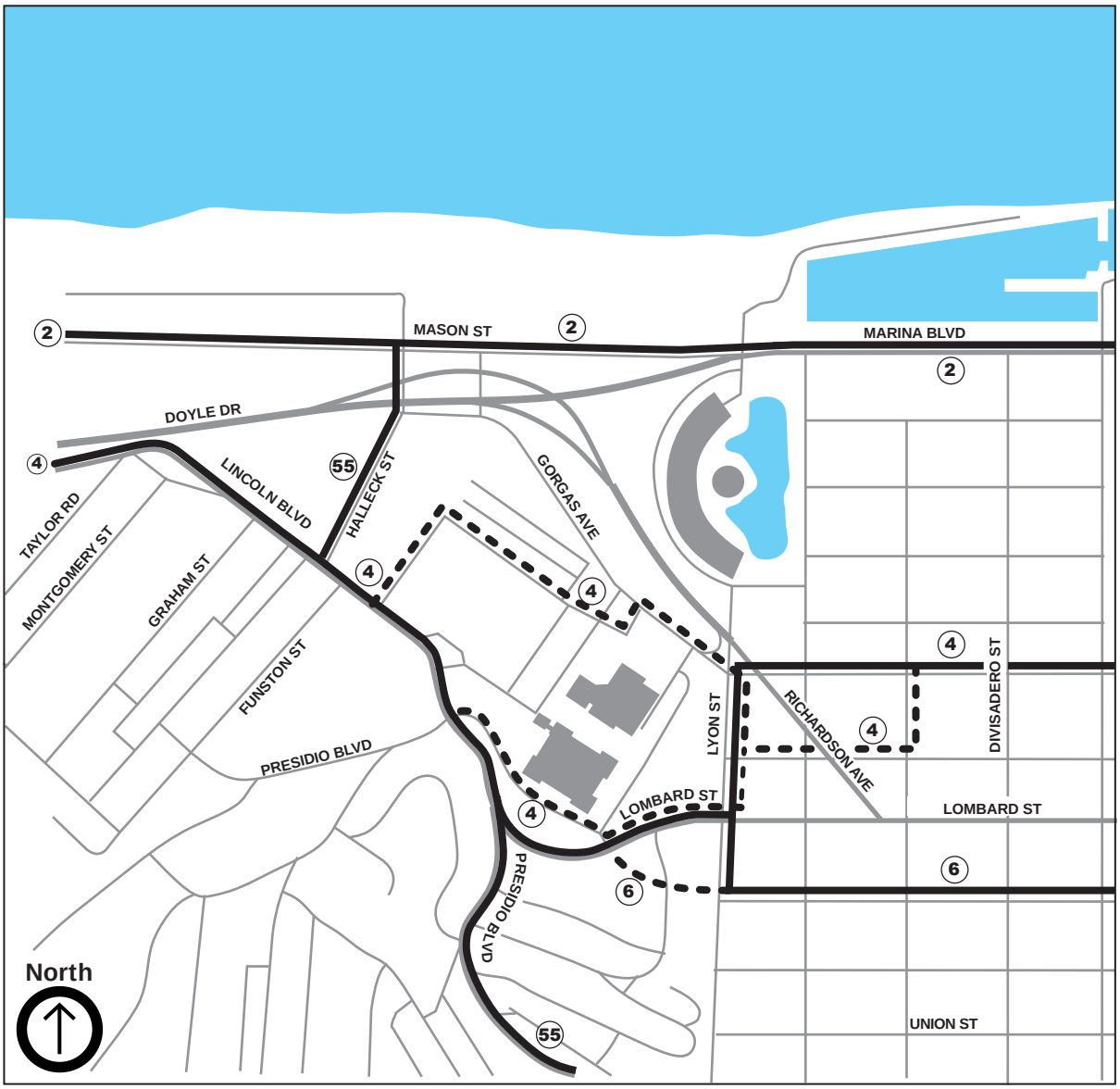


Figure 18.
Bicycle Routes

Existing

Proposed (subject to additional study)

(Greenwich Street). The current Presidio Trails and Bikeways Study will consider alternatives to the current access on Lombard Street to include widening the current pedestrian walkway at the Lombard Street Gate, re-establishing the historic opening of the Presidio perimeter wall at Greenwich Street (subject to additional environmental review, including Section 106 compliance), relocating bike route 4 to Gorgas Avenue or creating an expanded bicycle and pedestrian path from the Lombard Street Gate (see Figure 18).

4.1.7.5 INCREASED DEMAND FOR PUBLIC TRANSPORTATION

The 140 transit trips generated by Alternative 1 during the p.m. peak hour would be accommodated among the six bus lines serving the Presidio according to the expected geographic distribution of trips to and from the Letterman Complex. The 29-Sunset and 82X-Levi Plaza Express buses are expected to carry the greatest portion of the transit trips, with the 29-Sunset carrying 40 trips (or 26 percent of the total transit trips), and the 82X-Levi Plaza Express carrying 30 trips (or 24 percent of the total transit trips) generated by Alternative 1. The 41-Union, the 45-Union-Stockton, and the 28-19th Avenue would carry the remaining 70 transit trips. The maximum load points on MUNI lines serving the Presidio are far away and opposite to the Presidio commute direction. This results in existing capacity available to accommodate transit passengers associated with Alternative 1 on all of the MUNI lines listed above.

The average passenger load on Golden Gate Transit transbay buses during the a.m. and p.m. peak hours is about 30 passengers per bus, and there are about 120 buses per hour during the a.m. peak hour and about 110 buses per hour during the p.m. peak hour for about 23 different transbay routes (Golden Gate Bridge, Highway and Transportation District 1997). Alternative 1 would generate 20 transit trips to the North Bay in the p.m. peak hour. If these project-generated passengers were distributed across the 23 Golden Gate Transit routes proportionally to the existing distribution of passengers across routes, the project would add a maximum of two passengers to each route. Even if all of the passengers added to a single route were on the same bus, the estimated passenger load would not exceed the bus capacity for any one line.

4.1.7.6 IMPACTS OF TRANSPORTATION DEMAND MANAGEMENT MEASURES

At a minimum, the TDM strategies listed at the beginning of this section would be incorporated into Alternative 1 to encourage non-automobile modes and reduce parking demand. A TDM program, as discussed in mitigation measure TR-8, would be developed that would establish specific performance targets and a monitoring and reporting process.

4.1.7.7 CONSTRUCTION IMPACTS

Construction vehicles would generally access the Letterman Complex via Lombard Street and Doyle Drive/Richardson Avenue. From points east of the Presidio, construction traffic would use Lombard Street through the Lombard Street Gate to the Letterman Complex. Construction traffic would access the Letterman Complex from Doyle Drive via the Gorgas Avenue Gate. Construction traffic leaving the complex would use Halleck and Old Mason streets to access Doyle Drive at the intersection of Old Mason Street/Marina Boulevard and Doyle Drive; this traffic would not travel east on Marina Boulevard due to city restrictions. Figure 19 shows proposed construction routes.

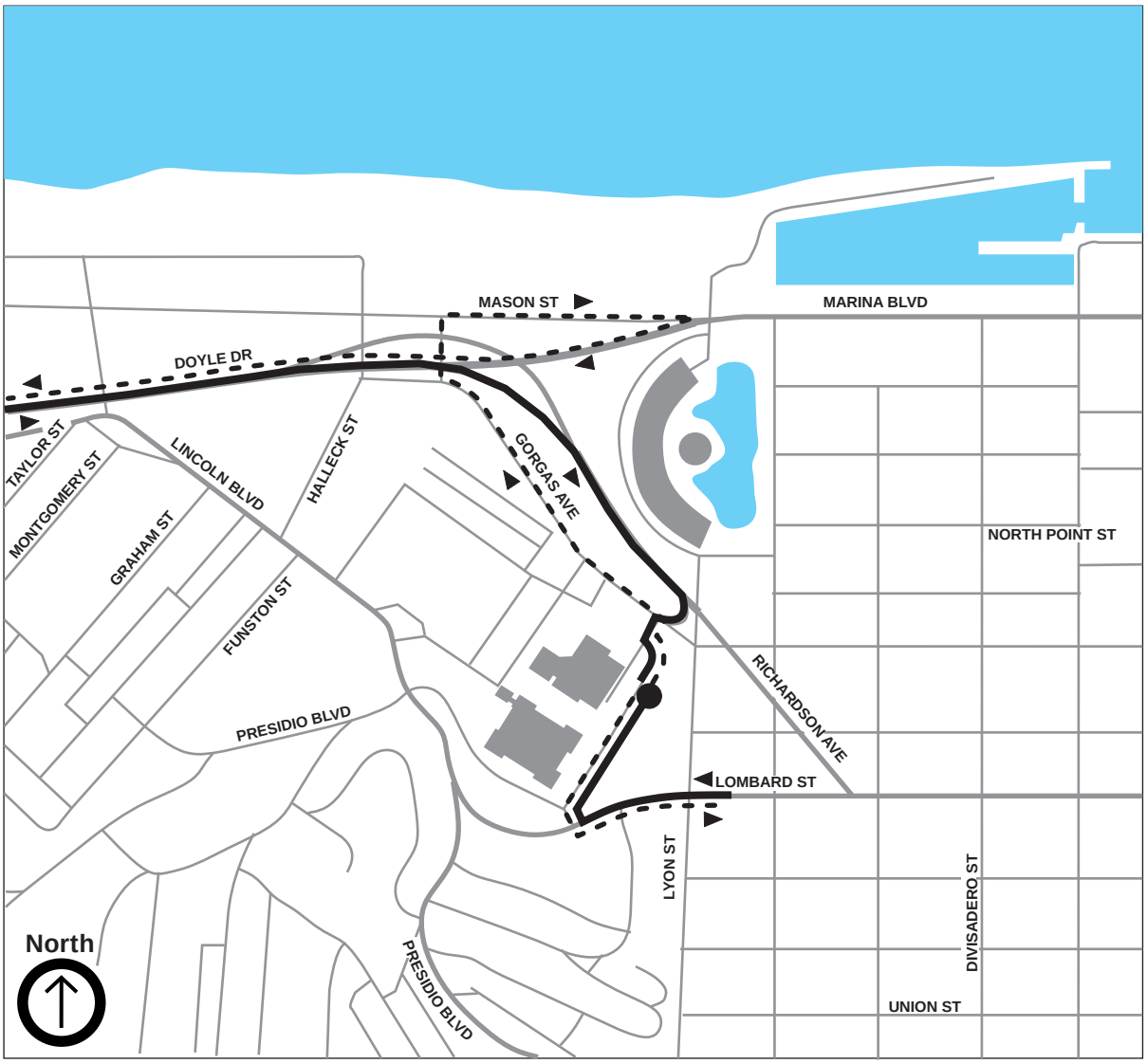


Figure 19.
Construction Truck Routes

Inbound Routes

Outbound Routes

The additional construction-related traffic could result in some conflicts with local and regional traffic, especially from the larger construction vehicles. However, because the vehicle trips traveling to and from the complex would be dispersed through the Bay Area, the vehicle trips generated by this alternative on other regional roadways would not be substantial and would fall within the normal fluctuations of traffic. A construction traffic management plan as discussed in mitigation measure TR-5 would be developed to provide specific routes and other mitigation measures to minimize traffic impacts.

4.1.8 Cultural Resources

This section discusses the effect of the proposed undertaking on the National Historic Landmark district.

Section 106 of the National Historic Preservation Act (NHPA) requires that every federal agency "take into account" how each of its undertakings could affect historic properties. An agency must also afford the Advisory Council on Historic Preservation (ACHP), an independent reviewing agency, a reasonable opportunity to comment on the agency's proposal. The ACHP provides the methodology for assessing impacts on historic resources in the 36 CFR Section 800.8.

A federal agency first determines that its proposed action constitutes an "undertaking." An undertaking is defined to include "a project, activity or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; those requiring a Federal permit, license or approval; and those subject to state or local regulation administered pursuant to a delegation or approval by a Federal agency." The Presidio Trust has determined that new development and uses within the 23-acre site would constitute an undertaking for purposes of Section 106 of the NHPA. Upon establishing that there is an undertaking, the federal agency is required to identify historic properties within a prescribed area of potential effects and to assess and take into account the adverse effects of the undertaking on those properties. The Section 106 process also requires the federal agency to afford the ACHP a reasonable opportunity to comment with regard to the undertaking.

Section 110 (f) of the NHPA charges federal agencies to afford some special protection to National Historic Landmarks. Specifically, it requires that the agency "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.

The APE is the geographic area or areas within which an undertaking may cause changes in the character or use of historic properties if such properties exist. The APE for the undertaking has been determined to be the 60-acre Letterman Complex and the Palace of Fine Arts property, although the specific site under consideration for new construction is the 23-acre site within the Letterman Complex.

The following criteria were considered in assessing the degree of impact:

- An undertaking has an adverse effect on a historic property when the undertaking may alter directly or indirectly any of the characteristics of the property that qualify the property for inclusion in the National

Register of Historic Places in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association. Adverse effects on historic properties include, but are not limited to:

1. Physical destruction, damage, or alteration of all or part of the property.
2. Removal of the property from its historic location.
3. Introduction of visual, audible, or atmospheric elements that diminish the integrity of the property's significant historic features.
4. Neglect of a property resulting in its deterioration.
5. Transfer, lease or sale of the property out of federal ownership or control without adequate and legally enforceable restrictions or conditions.

- Effects of an undertaking that would otherwise be found to be adverse may be considered as being not adverse:

1. When the historic property is of value only for its potential contribution to archeological, historical, or architectural research, and when such value can be substantially preserved through the conduct of appropriate research, and such research is conducted in accordance with applicable professional standards and guidelines;
2. When the undertaking is limited to the rehabilitation of buildings and structures and is conducted in a manner that preserves the historical and architectural value of affected historic property through conformance with the Secretary of *The Interior's Standards for Rehabilitation & Illustrated Guidelines for Rehabilitating Historic Buildings* (NPS 1992b); or
3. When the undertaking is limited to the transfer, lease or sale of a historic property, and adequate restrictions or conditions are included to ensure preservation of the property's significant historic features.

The scenic resources of the Letterman Complex are the result of natural features (such as topography) and man-made features over time. Views of the site are available from surrounding city neighborhoods; from surrounding Presidio planning areas such as East Housing and the Main Post; along adjacent travel routes in the Presidio; and from within the complex itself. The following factors were considered in analyzing potential visual impacts:

- Visibility of the proposed building and landscape changes from major viewpoints, both within and from outside the Presidio.
- Compatibility of the proposed building and landscape changes with the existing cultural landscape and historic scenic views (defined as those views and view corridors which existed at the Letterman Complex during its period of significance).

Under 36 CFR Section 800.14, the Presidio Trust has initiated the Section 106 consultation process through a Programmatic Agreement that envisions the sustained involvement of the State Historic Preservation Officer, Advisory Council on Historic Preservation, and NPS throughout the process of developing Design Guidelines

for new construction, conceptual design documents, and schematic design documents and into the construction phase.

4.1.8.1 EFFECTS OF RETAINING LAIR, REMOVING LAMC, AND ADDING NEW CONSTRUCTION

This alternative would provide for the continued use of the LAIR, and could include 503,000 square feet of replacement construction should the LAMC facility be demolished. Retention of the LAIR would only allow for the partial restoration of the historic setting of the earlier hospital complex and significant streetscapes. Therefore, the building would continue to have an adverse effect on the adjacent historic buildings.

New construction that would replace LAMC could be located on the present building site or distributed as infill construction throughout the 60-acre Letterman Complex. New construction would be sited and designed to reinforce historic patterns of development. Development on the 23-acre site would be directed by the Planning Guidelines (included in Appendix B) and Design Guidelines for new construction and would be more compatible in scale and massing than the existing LAMC. For infill construction elsewhere in the 60-acre Letterman Complex, additional design guidelines would be developed as required by mitigation measure CR-2, *Planning and Design Guidelines for Infill Construction*. New buildings would be compatible with adjacent historic buildings in height, size, and form and would use a palette of materials found elsewhere in the complex and Presidio, to ensure compatible new design. In conjunction with the rehabilitation of historic buildings and landscape throughout the Letterman Complex, demolition of LAMC with compatible new construction would have a beneficial effect on the historic setting.

4.1.8.2 BENEFICIAL EFFECTS ON EXTANT CULTURAL LANDSCAPE FEATURES

The historic landscape of the Letterman Complex has been compromised over time by the realignment of Lombard Drive in the 1950s, the construction of the LAMC and LAIR, and the removal of numerous historic structures, along with new construction that is not in keeping with the historic setting (such as buildings 1027, 1028, 1029, and 1030). Under this alternative, significant historic landscape features and spaces within the 60-acre complex would be rehabilitated and preserved during the process of making changes to accommodate new uses. Site improvements, listed below, done in conformance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes* (NPS 1996c), would enhance the historic setting and compatible new landscape elements would reinforce the significant characteristics of the Letterman Complex:

- The historic Lyon Street windrow and other remnant historic tree plantings would be maintained and rehabilitated.
- The Presidio boundary wall and Lombard Street Gate would be preserved and rehabilitated.
- Historic circulation networks would be retained and streetscapes rehabilitated.
- New construction, including infill construction within the historic hospital complex, would be sited to reinforce the historic patterns of development.
- Historic drainage patterns and features would be preserved and reused whenever possible.
- The Gorgas Avenue streetscape would be preserved, in conjunction with the removal of nonhistoric buildings and landscape elements along this streetscape, to protect the last remaining industrial/maintenance center in the historic district.

- Excess pavement throughout the historic hospital complex would be removed.
- Infill construction within the historic hospital complex would enhance the campus-like setting of the historic landscape and unify the disjointed remnant of the historic building cluster.
- Infill construction would reestablish the western edge of the former hospital courtyard.
- Infill construction would reestablish sections of the historic street layout and landscape, resulting in a beneficial impact on the cultural landscape.

4.1.8.3 EFFECT DUE TO INTERSECTION AND ROADWAY IMPROVEMENTS

Under this alternative, several changes would be made to the east end of the Gorgas Avenue corridor to address traffic and safety concerns. These actions include the reconfiguration of the Gorgas Avenue Gate/Lyon Street entrance and a connector from Gorgas Avenue to Richardson Drive

Reconfiguration of the Gorgas Avenue Gate/Lyon Street entrance to address traffic safety concerns would include a reduction of non-historic pavement to the maximum extent possible, restoration of the immediate historic landscape, and a more defined sense of entry into the Presidio, as historically existed.

A new, 28-foot wide road lane would be constructed between buildings 1160 and 1152 to facilitate movement of traffic from the Letterman Complex to Richardson Avenue. The siting of a new connector for exiting traffic from Gorgas Avenue to Richardson Avenue would result in an increase of vehicular traffic on the eastern edge of Gorgas Avenue. However, this new connector would not require the removal of 1160, a contributing building to the National Historic Landmark district. Building 1152, constructed in 1945 as a two-story wood, concrete and steel frame gymnasium with red composition roof, is currently in use as a gym and would be retained. The alteration of the setting at the east end of Gorgas Avenue, through increased vehicular traffic and the potential segregation of buildings 1151 and 1152 from pedestrian traffic in this area, would not constitute an adverse effect on these properties. The balance of the streetscape's industrial character would be preserved and design refinements of these intersection improvements would strive to maintain the overall streetscape and its character-defining features. Safe pedestrian access to buildings 1151 and 1152 would also be factored in the design process.

The minor roadbed improvements at the Lombard Street/Presidio Boulevard intersection alter the immediate landscape by widening the northbound lane of Presidio Boulevard to provide one right-turn lane in addition to the through lane. Construction would be kept to a minimum to preserve and protect as much as possible of the remnant historic landscape features to retain the historic character of the road corridor.

Improvements to the Lombard Street Gateentrance which would include signalization and re-striping to accommodate one turning lane and one through lane within the Presidio, would not have an adverse effect on elements of the historic gate entrance. In conjunction with the intersection improvements, the historic gate and wall would be preserved through conservation work. Overall, these intersection improvements would comply with *The Secretary's Standards for the Treatment of Historic Properties* and would not have an adverse effect on the National Historic Landmark.

4.1.8.4 VISUAL IMPACTS

This alternative includes the removal of LAMC and its replacement with lower-scaled construction which would have a beneficial effect on the visual quality of both the 23-acre site and the 60-acre Letterman Complex.

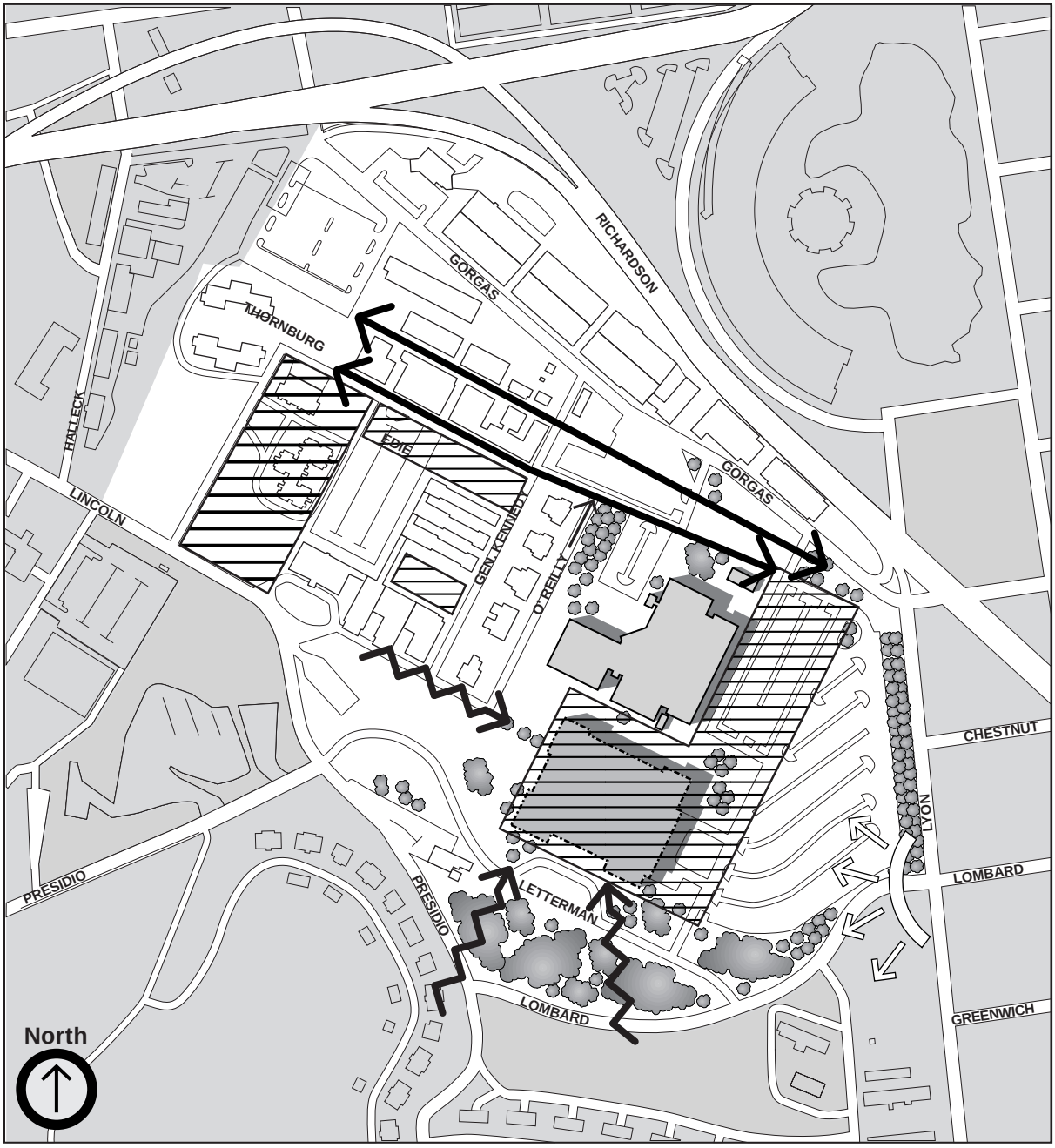
Should this alternative include the removal of the 10-story LAMC building, and replacement with new construction limited to 60 feet in height, the visual integrity of the complex would be enhanced and views from many vantage points within the Presidio would be greatly improved. Conversely, because the LAMC is so visually conspicuous, its retention and use under this alternative would continue to diminish the visual integrity of the complex. If infill construction within the Letterman Complex occurs, scenic viewing may be adversely affected (Figure 20). However, additional design guidelines for infill construction in the complex and building height restrictions would help to minimize these impacts.

4.1.8.5 EFFECT ON VISITOR EXPERIENCE

Under this alternative, the 23-acre site would be used as a research and education facility that would provide new opportunities for residents and visitors to attend educational programs and learn about advances in health and science. Actions such as the introduction of information/orientation kiosks, the rehabilitation of historic buildings to include public lobby spaces with interpretive information about the complex, the reuse of the Letterman auditorium for public programs, and interpretive displays incorporated into the landscape at key spots would have a beneficial impact on the visitor experience. In addition, infill construction throughout the complex could afford an opportunity for public gathering places and locations for programs open to the public. These improvements would increase public access and visitor opportunities considerably over what exists today for visitors.

4.1.8.6 EFFECT ON ARCHEOLOGICAL PROPERTIES

The initial Archeological Management Assessment (AMA) conducted for the 60-acre Letterman Complex indicates that ground-disturbing activities associated with the alternative would have the likelihood of encountering archeological resources. Appendix F contains a program describing future AMAs and Monitoring Programs to be employed for all undertakings at the Letterman Complex. The AMAs and Monitoring Programs would ensure that all planned undertakings would be reviewed by a qualified archeologist prior to their implementation. Construction projects and ground-disturbing activities would be closely observed in the vicinity of sensitive archeological areas to discover, document, protect, and manage the archeological record of the Presidio. An inventory study of known archeological sites in the area of each undertaking, including test excavations, as appropriate, would be conducted to determine whether significant sites or historic features are extant and whether construction might adversely affect archeological resources. Reports of any investigations would be submitted to the SHPO and the ACHP. A phased inventory, evaluation, monitoring, and treatment program for archeological resources regarding ongoing maintenance and construction in the complex would be conducted. The discovery of any human remains or associated mortuary items covered under the Native American Graves Protection and Repatriation Act would be treated in accordance with 43 CFR 10.4 (Inadvertent discoveries). Consultation and work would be conducted in accordance with the Programmatic Agreement (Appendix F to the EIS).



Historic View Corridors

Obstructed Views

Views from Entry Point

Figure 20. Visual Impacts of Alternative 1

4.1.9 Air Quality

This section summarizes both the short-term and long-term impacts of the alternative on air quality. Based on BAAQMD recommendations for compliance with CEQA and the methodology applied within the 1994 GMPA EIS, the following methods are used to predict impacts:

- Qualitative discussion of construction emissions based on the methods outlined in the BAAQMD *CEQA Guidelines* (1996).
- Quantitative discussion of regional operational emissions based on use of CARB's EMFAC7G and URBEMIS7G emissions estimating models and the BAAQMD *CEQA Guidelines*.
- Quantitative discussion of local operational concentrations of CO based on use of the California Department of Transportation's CALINE4 dispersion model and the BAAQMD CEQA Guidelines.
- Documentation of state implementation plan conformity based on the methodology provided in 40 CFR 51 Subpart W and the BAAQMD *CEQA Guidelines*.

The following criteria are considered to assess the degree of impact (BAAQMD 1996):

Project Demolition/Construction Impacts

- Whether appropriate mitigation is employed to minimize particulate emissions during construction/ demolition.
- Whether construction/demolition-related emissions of asbestos are in compliance with BAAQMD Regulation 11, Rule 2.

Project Operations Impacts

- Whether operation-related emissions equal or exceed 80 pounds per day of ROG, NO_x, and inhalable particulates (PM_{10}).
- Whether CO concentrations are above the federal or state ambient air quality standards.
- Whether there is the potential to expose the public to toxic air contaminants in excess of the following thresholds (these criteria refer to incremental risk of the proposed project):
  - Probability of contracting cancer exceeds 10 in 1 million for the maximally exposed individual.
  - Ground-level concentrations of noncarcinogenic toxic air contaminants would result in a hazard index greater than 1 for the maximally exposed individual.

Cumulative Impacts

- Whether proposed development conforms to applicable implementation plans approved under Section 176(c) of the federal Clean Air Act.

4.1.9.1 SHORT-TERM DEMOLITION/CONSTRUCTION IMPACTS

Particulate Emissions – Since this alternative involves building demolition and potential construction replacement, air quality could potentially be affected for a short period. Heavy equipment activity could create fugitive dust and emit NO_x, CO, SO_2, hydrocarbons (HC) and particulate matter as a result of diesel fuel combustion. The primary pollutant of concern in fugitive dust would be PM_{10}. Construction emissions would be short term and temporary, but could still cause adverse effects on local air quality.

The Bay Area Air Quality Management District (BAAQMD 1996) has developed an analytical approach that obviates the need to quantitatively estimate these emissions. Instead, BAAQMD has identified a set of feasible PM_{10} control measures for construction activities (Table 23). Should the LAMC be removed to restore open space, both basic and enhanced control measures would be applicable. Incorporation of mitigation measures AQ-1, *BAAQMD Control Measures* and AQ-2, *Demolition of Existing Buildings* into the alternative would reduce the effects of demolition and construction activities to a less-than-significant level.

Asbestos – The demolition, renovation or removal of asbestos-containing building materials is subject to BAAQMD Regulation 11, Rule 2. Any demolition activity subject to, but not complying with the BAAQMD requirements, would be considered to have a significant impact. Because the alternative would comply with the applicable requirements for asbestos control, demolition and construction activities would cause a less-than-significant impact.

4.1.9.2 LONG-TERM REGIONAL OPERATION IMPACTS

Regional emissions caused by project-related traffic are estimated for each alternative using the URBEMIS7G computer program (SJVUAPCD 1998). URBEMIS was developed by the California Air Resources Board as a planning tool to assess the region-wide impacts of proposed land use developments. To estimate vehicular emissions, the URBEMIS7G model uses emission factors from the California Air Resources Board EMFAC7G emissions model. Vehicle operating characteristics are determined by each land use type in the alternative and the setting of the site. The emission rates are calculated using the vehicle-dependent factors from the EMFAC7G model. URBEMIS provides the resulting emission rates.

The following input is used with the URBEMIS7G model. The daily vehicular trip generation rate and the worker trip percentage for each proposed land use category are based on the transportation analysis for this document (Wilbur Smith Associates 1999). Default values recommended by the BAAQMD (1996) are used for the vehicle fleet, the average trip length, and meteorological conditions within the San Francisco portion of the air basin. All pollutants except CO are analyzed under summer conditions using a temperature of 75 degrees Fahrenheit; CO is analyzed under winter conditions at 40 degrees Fahrenheit.[1] The analysis year for each alternative is 2010.

[1] Average summer and winter temperatures based on NOAA-CIRES data and Appendix H of URBEMIS7G User's Guide (SJVUAPCD 1998).

Table 23
Feasible Control Measures for Construction Emissions of PM_{10}

FUGITIVE DUST CONTROL	CONTROLS TO BE IMPLEMENTED AT ALL CONSTRUCTION SITES
Basic Control Measures (all construction sites)	Cover all trucks hauling soil, sand, and other loose materials, *or* require all trucks to maintain at least 2 feet of freeboard.
	Water all active construction areas at least twice daily.
	Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas.
	Sweep daily (with water sweepers) all paved access roads, parking areas and staging areas at construction sites.
	Sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets.
Enhanced Control Measures (sites greater than 4 acres)	All "basic" control measures listed above.
	Hydroseed or apply (non-toxic) soil stabilizers to inactive construction areas (previously graded areas inactive for 10 days or more).
	Enclose, cover, water twice daily, or apply (non-toxic) soil binders to exposed stockpiles (dirt, sand, etc.)
	Limit traffic speeds on unpaved roads to 15 mph.
	Install sandbags or other erosion control measures to prevent silt runoff to public roadways.
	Replant vegetation in disturbed areas as quickly as possible.
Optional Control Measures (sites near sensitive receptors)	Install wheel washers for all exiting trucks, or wash off the tires or tracks of all trucks and equipment leaving the site.
	Install windbreaks, or plant trees/vegetative windbreaks at windward side(s) of construction areas.
	Suspend excavation and grading activity when winds (instantaneous gusts) exceed 25 mph.
	Limit the area subject to excavation, grading and other construction activity at any one time.

Source: BAAQMD 1996

Alternative 1 assumes demolition of LAMC and replacement construction up to 503,000 square feet for research and education space. Alternative 1 would result in an increase of up to approximately 5,430 internal and external vehicle trips per day. Based on URBEMIS7G modeling results, increased vehicle trips associated with the alternative would generate approximately 52 lb/day of ROG, 88 lb/day of NO_x, 39 lb/day of PM_{10}, and 634 lb/day of CO. These emission rates are summarized in Table 22. Alternative 1 would result in regional operational emissions exceeding the BAAQMD's significance thresholds for NO_x. Implementation of TDM measures would encourage alternatives to automobile use, and thus contribute to improvements in air quality and lower NO_x emissions.

Alternative 1 would also result in nominal emissions from the use of electricity and natural gas at the site. Emissions would be produced directly at the site with the burning of natural gas by water heaters, space heaters, and gas appliances. Emissions are produced indirectly through increased electricity usage for space heating, lighting, and operation of electrical appliances. However, these emissions would not be significant when compared to the emissions caused by project-related traffic. Indirect emissions associated with electricity generation may occur at plants that are outside of the San Francisco Bay Area air basin. Alternative 1 would not have the potential to expose nearby receptors to toxic air contaminants.

4.1.9.3 LONG-TERM LOCAL OPERATIONS IMPACTS

Table 22 shows that regional emissions of CO for Alternative 1 would exceed the BAAQMD screening threshold of 550 pounds per day. Therefore, the following analysis of localized CO impacts is necessary. For analysis of localized CO concentrations under Alternative 1, the BAAQMD's manual calculation method is used to evaluate worst-case air quality conditions at the most heavily impacted intersection. The most congested intersection of the transportation analysis is the Lombard Street/Lyon Street intersection (other intersections in the vicinity would operate at better levels of service than Lombard Street/Lyon Street). Emission factors and reference CO concentrations based on worst-case meteorology are recommended by the BAAQMD (1996). To evaluate worst-case conditions, the projected 2010 p.m. peak hour traffic volumes and intersection geometry are used with the reference concentrations to estimate the worst-case future CO concentrations in the vicinity of the intersection. Concentrations fall off rapidly as distance from the intersection increases. Because the worst-case traffic volumes and meteorological conditions are considered, the analysis provides a conservatively high estimate of concentrations.

Alternative 1 would result in 2010 volumes of less than 1,680 vehicles per hour during the p.m. peak hour through the Lombard Street Gate. The value of 1,680 vehicles per hour is selected as a hypothetical worst-case vehicle count for Lombard Street Gate. Based on the modeling results using the BAAQMD manual calculation with these worst-case traffic volumes, Alternative 1 would generate roadside concentrations of less than 7.9 parts per million (ppm) of CO on a 1-hour basis and 5.4 ppm of CO on an 8-hour basis. The state ambient air quality standards for CO are 20 ppm on a one-hour basis and 9 ppm on an 8-hour basis. Therefore, Alternative 1 would not result in local operational air quality impacts exceeding the state ambient air quality standards for CO.

4.1.10 Noise

This section summarizes both the short-term and long-term impacts of Alternative 1 on the noise environment. Based on the methodology within the GMPA EIS, the following methods were used to predict impacts:

- Review of the existing land uses and noise environment.
- Analysis of construction noise impacts based on compliance with provisions equivalent to the standards in the applicable local noise ordinance.
- Analysis of traffic noise increases caused by traffic volume increases.
- Analysis of stationary source noise impacts based on review of proposed uses and nearby sensitive receptors.

The following criteria were considered to assess the degree of impact.

Project Demolition/Construction Impacts

- Whether noise impacts during periods of demolition or construction would exceed the limitations of the San Francisco Noise Ordinance.

Project Operations Impacts

- Whether traffic noise exposure for noise-sensitive receptors would be in excess of thresholds contained in 23 CFR 772, or, in those areas where traffic noise already exceeds applicable standards, would result in a noticeable traffic noise increase (i.e., greater than 3 dBA).
- Whether stationary noise source exposure at noise-sensitive receptors would be in excess of applicable safety standards.

4.1.10.1 SHORT-TERM DEMOLITION/CONSTRUCTION NOISE IMPACTS

Construction noise is assessed qualitatively in terms of the distance between sensitive receptors and construction activities. Reference noise values for standard construction activities are found in Table 24.

Construction noise would create an intermittent impact on the noise environment. Reference construction noise data illustrates that operation of typical construction equipment would result in noise levels between approximately 75 dBA and 100 dBA measured 50 feet from the source, depending primarily on the type of equipment.

The schedule for demolition and construction is provided in Section 2.3.7. Construction activities would include demolition, grading, excavation, foundation work and truck traffic, and would most likely be noisiest during the first three to six months of the project. Building demolition would take place in three phases: 1) hazardous material abatement; 2) building salvage/material reclamation; and 3) structure demolition. Hazardous material abatement work, covering a period of 45 to 60 days, would largely be contained within the

Table 24
Construction Equipment Noise Levels Before and After Mitigation (dBA)

EQUIPMENT TYPE	NOISE LEVEL AT 50 FEET (dBA)	
	WITHOUT NOISE CONTROL	WITH FEASIBLE NOISE CONTROL[a]
Earthmoving		
Front Loaders	79	75
Backhoes	85	75
Dozers	80	75
Tractors	80	75
Scrapers	88	80
Graders	85	75
Trucks	91	75
Pavers	89	80
Materials Handling		
Concrete Mixers	85	75
Concrete Pumps	82	75
Cranes	83	75
Derricks	88	75
Stationary		
Pumps	76	75
Generators	78	75
Compressors	81	75
Impact		
Pile Drivers	101	95
Jack Hammers	88	75
Rock Drills	98	80
Pneumatic Tools	86	80
Other		
Saws	78	75
Vibrators	76	75

Source: Bolt, Beranek and Newman 1971

Note:
[a] With feasible noise controls, these levels are obtainable by selecting quieter procedures or machines, requiring no major redesign or extreme cost.

buildings and would have little effect on adjoining uses. The second phase, building salvage/reclamation, would require 30 to 60 days and would also be mostly contained within the structures. The final structure demolition activity would take 30 to 60 days.

Earthmoving activities and most demolition activities are capable of causing noise levels between approximately 85 and 90 dBA at distances of 50 feet from the source without noise control. With noise control, as shown in Table 24, the same sources would be between 75 and 80 dBA. This would include most stationary noise sources, such as pumps, generators, and mixers, and most mobile sources, including dozers, trucks and scrapers. Noise levels for a single piece of equipment tend to drop off at a rate of 6 decibels per doubling of distance. This means that beyond 100 feet of the noise source, routine construction noise levels would be between approximately 79 to 84 dBA without noise control, or 69 to 74 dBA with noise control.

Demolition activities could include mechanical wrecking and use of an onsite temporary concrete crushing operation. Construction could also require use of impact tools such as pile drivers. During the short periods of potential impact tool use, considerable noise would be generated. Stationary source noise due to the crushing operation could also be considerable. If conducted at the Letterman Complex, these activities would be intermittent and of a short-term nature.

Impacts on Residential Neighborhoods – The analysis of construction noise in the GMPA EIS was based on the demolition and removal of about 275 buildings, including the LAMC (NPS 1994a). The GMPA EIS determined that buildings to be removed would need to be at least 250 feet from nearby residences and facilities in order for noise impacts on property owners to be less than 80 dBA L_{eq}. Should the LAMC building be removed under this alternative to restore open space, demolition would take place about 450 feet from the nearest residential neighborhoods. Thus, demolition activities would not exceed the noise thresholds in the San Francisco Noise Ordinance.

Impact tools would be required by mitigation measure NO-1, *Reduction of Construction Noise* to be equipped with intake and exhaust mufflers. While noise would be expected to be noticeable to residents within the adjacent San Francisco neighborhoods, these residences are at least 250 feet from the construction area and are currently exposed to noise from other nearby urban activities. Because the impacts would be short term and they would also be attenuated over the distance and partially masked by unrelated urban noise, the residences would not experience disruptive noise levels.

Impacts on Recreational Users Outside the Letterman Complex – Recreational users outside the Letterman Complex would experience construction noise throughout its duration, but because of the size and location of the Letterman Complex, most would be protected from construction noise by distance. Because the Letterman Complex is within a developed area and within close proximity to the Lombard Street and Gorgas Avenue gates, routine construction noise is not expected to adversely impact the natural quiet of areas experiencing less activity within the Presidio. Since the activities would be more than 250 feet away from most recreational users within the Presidio and the impacts would be reduced by mitigation measure NO-1, *Reduction of Construction Noise*, the noise levels would be below thresholds in the San Francisco Noise Ordinance and would not be expected to disturb recreational users, tenants, or other people outside the Letterman Complex.

Impacts on Recreation Users and Others Within the Letterman Complex – Short-term impact tool use and demolition activities could be disruptive to passive recreation users and other people within the Letterman Complex. As determined in the GMPA EIS and required by mitigation measure NO-1, *Reduction of Construction Noise*, erecting barriers around construction equipment and restricting access to construction sites would reduce noise impacts but not to a level of insignificance to those closest to (i.e., within 250 feet from) construction equipment. Since these users could experience potentially disruptive impacts, replacement construction under this alternative would have an unmitigable, potentially significant short-term impact on the occupants and recreational users internal to the Letterman Complex.

4.1.10.2 LONG-TERM TRAFFIC NOISE INCREASES

The analysis in the GMPA EIS for impacts due to traffic noise is based on a comparison of the existing noise environment with compatibility standards for land use development established by the Federal Highway Administration (FHWA) and the American National Standards Institute (ANSI). The analysis shows that traffic noise would increase under the GMPA as traffic to and from the Presidio increased, and that the increases would not substantially exceed existing noise levels or the FHWA Noise Abatement Criteria or ANSI standards (NPS 1994a). Because traffic volumes for Alternative 1 would be within the volumes shown in the GMPA EIS, noise impacts due to traffic would be within the impacts illustrated in the GMPA EIS.

This analysis re-evaluates the traffic noise environment for compatibility with the noise abatement criteria and evaluates traffic volume increases associated with new development to determine whether noise level increases would be noticeable. Generally, traffic volumes must double to produce a noticeable (3-dBA) increase in noise levels. For outdoor recreation areas, the applicable noise abatement criteria is 67 dBA L_{eq} (23 CFR 772).

Existing noise levels along the roadways surrounding the Letterman Complex are described in Section 3.12.2. The transportation analysis for this document provides p.m. peak hour traffic volumes for nine intersections and numerous roadways in the site vicinity. Traffic volume increases between existing p.m. peak volumes and 2010 p.m. peak volumes with Alternative 1 are examined for Lyon Street between Lombard and Francisco streets, Presidio Boulevard north of Lombard Street, and Gorgas Avenue west of Sternberg Road. The roadways which are external to the Letterman Complex, including Presidio Boulevard in the vicinity of the Officers' Family Housing (at Lombard Street), would experience less than a two-fold increase in peak traffic volumes over existing conditions. Because peak traffic volume increases on these streets would be less than two-fold, associated noise level increases would be less than 3 dBA. This means that residents within the adjacent San Francisco neighborhoods and users of the Officers' Family Housing would not experience noticeable noise level increases, and no significant impacts are expected.

To characterize noise levels within the Letterman Complex and near intersections and roadways that could be newly created by the proposed development, the noise environment along Gorgas Avenue was analyzed. Gorgas Avenue and the Gorgas Avenue Gate would experience considerable increases in traffic volumes. As shown in Section 3.12.2, the existing noise environment does not exceed the noise abatement criteria of 72 dB L_{eq} for developed settings. Increases between existing p.m. peak traffic volumes and 2010 peak volumes with Alternative 1 would be more than two-fold for this roadway, and increases in noise levels associated with peak traffic volumes after implementation of the alternative would be perceptible. The resulting traffic noise levels

along Gorgas Avenue would be approximately 70 dBA within 25 feet of the centerline and less than 67 dBA beyond 50 feet. No recreational uses or housing uses are proposed under Alternative 1. Employees of the proposed research and education uses would be expected to use the open spaces proposed as part of the development. These open spaces are typical of those in other urban commercial developments and are not typical of large recreation areas such as Crissy Field or Golden Gate Park. Therefore, users of the new open space in the Letterman Complex would not be considered to be sensitive receptors. Because the traffic noise levels along Gorgas Avenue would be compatible with the uses proposed with Alternative 1, the noise levels within the Letterman Complex would cause no significant impacts.

Because no existing sensitive receptors would experience noticeable increases in peak traffic noise levels and the new uses within the Letterman Complex would be consistent with the noise abatement criteria, the traffic noise associated with Alternative 1 would not cause a significant impact.

4.1.10.3 LONG-TERM STATIONARY SOURCE NOISE IMPACTS

No major stationary sources of noise would be associated with Alternative 1. The alternative would result in a minor increase in stationary source noise from leasing of the LAIR and any development that would replace the LAMC. For example, heating and ventilation systems would generate a steady level of low-level noise, and the additional visitors to the uses within the Letterman Complex would generate more noise from human activity. However, noise levels at the sensitive receptors in nearby San Francisco neighborhoods are not expected to change perceptibly from existing levels. Traffic would remain the dominant noise source on and in the vicinity of the Letterman Complex. Accordingly, no significant long-term stationary source noise impacts are expected.

4.1.11 Cumulative Impacts

This section discusses the cumulative impacts that would result when the effects of Alternative 1 are added to or interact with effects of other proposed actions in the Presidio and surrounding area. The assessment of cumulative impacts is not substantially different from the assessment of direct or indirect impacts discussed above. The major difference is that the cumulative impact assessment entails a more extensive and broader review of possible effects.[2] The following analysis focuses on resources and areas that may be significantly affected by the project, including solid waste, water supply and distribution, schools, housing, traffic and transportation systems, cultural resources (including visitor experience and visual resources), air quality, and noise. As documented in Appendix A, the following resources would not be significantly affected by cumulative impacts: water quality, wetlands and stream drainages, native plant communities, wildlife, and special status species.[3]

The level of analysis and scope of cumulative impact assessment within each of the resource areas under consideration is commensurate with the potential impacts, i.e., a greater degree of detail is provided for potentially more serious impacts. The qualitative and quantitative criteria identified at the beginning of each

[2] While no "cookbook" approach to cumulative impacts analysis exists, the approach taken in this section is described in a CEQ handbook (1997).
[3] Documented in Sections D, Water Quality; O, Wetlands and Stream Drainages; P, Native Plant Communities; Q, Wildlife; and R, Special Status Species in Appendix A.

discussion of impacts within Sections 4.1.2 through 4.1.10 were used to determine whether cumulative impacts would be significant and whether the resources of concern would be degraded to unacceptable levels. Where applicable, cumulative effects are also compared to appropriate national, state, regional, or community goals to determine whether the total effect would be significant.

4.1.11.1 SOLID WASTE

Demolition, construction and renovation activities at the Letterman Complex would include the disposal of approximately 35,400 tons of debris and would contribute to a cumulative reduction in regional solid waste capacity. These activities, along with the other projects listed in Table 9, would result in the disposal of a total of approximately 63,145 tons of debris.[4] This tonnage would result primarily from the potential demolition of the 451,000-square-foot LAMC and the 356,000-square-foot LAIR facilities at the Letterman Complex and the 122,000-square-foot addition to building 1801 at the Public Health Service Hospital Complex. The 63,145 tons of debris generated from the Letterman Complex and the other projects represents approximately 1.0 percent of the 6.6 million tons total volume of waste disposed of in the nine-county Bay Area in 1997. Wood and masonry (composed primarily of brick and concrete) would be the largest portion of the waste stream, followed by gypsum, paper, glass, plastics, asphalt, various roofing materials, and mixed waste. Wastes would also include major appliances, heating and air conditioning equipment and ducting, furniture, carpet and flooring, wiring, plumbing, and other fixtures (though many of these items would be sold or salvaged prior to demolition). The California Integrated Waste Management Act of 1989 requires cities and counties to divert 50 percent of their waste streams from landfills. The Presidio Trust would implement cost-effective, environmentally protective alternatives to disposal of demolition debris to help meet the mandates of the state's 1989 waste diversion law, such as the following:

- Choosing contractors who understand the processes involved and are able to maximize reuse and recycling of construction and demolition materials.
- Clearing salvageable items prior to demolition activities, including such items as piping, flooring, doors, windows, bathroom fixtures and kitchen fixtures, hospital equipment, heaters, and lumber.
- Removing and encapsulating contamination before demolition to minimize commingling of the wastes and to maximize reuse of the uncontaminated materials.
- Bringing down buildings piece by piece, as in hand demolition, to recover the maximum amount of reusable materials.
- Size reducing (especially concrete) and presorting and segregating materials after demolition to increase salvage value of the recovered materials and to decrease tipping fees for different materials in the debris.
- Recycling materials onsite to lower both hauling and disposal costs.
- Storing recovered materials within the Presidio to avoid flooding a market with too much material at one time (which drives local prices down and reduces potential income from the sale of the material).

[4] The Crissy Field project included removal of 86,000 tons of soil containing hazardous substances which were taken to federally approved dump sites. The contribution to the regional solid waste stream associated with this soil removal was not considered in the cumulative impacts on the solid waste stream as the disposal is related to hazardous waste, rather than the general waste streams analyzed in this assessment.

Implementation of these strategies to dispose of demolition debris would reduce the impacts on regional landfills to a less than significant level.

4.1.11.2 WATER SUPPLY

The Lobos Creek watershed would be insufficient to supply the in-stream flow requirement necessary to maintain natural streambed characteristics and meet peak Presidio daily demands of 1.62 mgd with this alternative and the other projects listed in Table 9 that are within the Presidio (BAE 1998a). Alternative 1 and the other identified projects within the Presidio would contribute to a net cumulative peak shortfall of approximately 221,000 gpd on the Presidio-wide water supply due to excess demand (BAE 2000). However, water supply- and demand-side measures and instream flow monitoring described in mitigation measures WS-2, WS-3, and WT-1 would result in a water savings of approximately 320,000 gpd, which would minimize cumulative impacts on the system and baseline stream flow maintained in Lobos Creek.

Projects within the surrounding area would increase water consumption, but according to the city, not in excess of amounts expected and provided for in this area. In general, the projects represent replacement or renovation of existing facilities previously served by the city. New construction would be subject to current City of San Francisco water conservation code requirements. Should the Presidio Trust enter into a water purchase agreement with the city to ensure adequate water supplies during peak demand periods, there would be no significant impact on regional water demand since the pending purchase agreement would essentially replace previous agreements held by both the U.S. Army and NPS with the city.

4.1.11.3 SCHOOLS

As discussed in the GMPA EIS, this alternative would not contribute to cumulative impacts to SFUSD because existing Presidio housing units have been historically contained within the jurisdiction of the SFUSD and new school enrollment represents partial restoration of prior enrollment levels. SFUSD would be reimbursed through Impact Aid Program payments for pupils living at the Presidio. The increased intensity of residential use of the 1880 Lombard Street residential building would not be of a magnitude that would result in a significant increase in school enrollment.

4.1.11.4 HOUSING

This alternative and the projects listed in Table 9 would add 2,231 employees to the local economy. The new development within the Letterman Complex accounts for 970 jobs, or 43 percent of this total. This growth in employment is estimated to require 430 new housing units (BAE 2000). The listed projects include provision of 1,331 new housing units (1,304 renovated units on the Presidio and 27 new units in the Marina District.) The housing demand resulting from the projects would be more than offset by the housing units added to the local supply, largely by reactivation of housing at the Presidio. Therefore, cumulative demand under this alternative would not contribute to employment-related housing demand increases in the surrounding neighborhood or city.

4.1.11.5 TRAFFIC AND TRANSPORTATION SYSTEMS

The traffic generated by the land uses under Alternative 1 would contribute to the expected increases in traffic volumes on adjacent local and regional roadways. In addition to the land uses proposed in Alternative 1, cumulative increases in traffic volumes would be attributable to reasonably foreseeable projects within the Presidio and in the surrounding neighborhoods as shown in Table 19. Alternative 1 would contribute 27 percent

of the total p.m. peak-hour traffic resulting from these cumulative projects (Table 19). This proportion varies throughout the project impact zone depending on location. For example, Alternative 1 would contribute 20 percent of the cumulative growth in traffic at the intersection of Lyon and Lombard streets and 87 percent of cumulative growth in traffic at the reconfigured intersection of Richardson Avenue/Lyon Street, which is the primary vehicular entrance to the 23-acre site.

The operating conditions at the project impact zone intersections shown in Table 20 reflect the impact of Alternative 1 land uses and the other cumulative projects and actions occurring within and near the Presidio. The combined cumulative projects, including Alternative 1, would generate increased traffic volumes throughout the Presidio. The cumulative projects would contribute 330 additional vehicles on Lincoln Boulevard during the p.m. peak hour, and Alternative 1 would make up about 14 percent of the additional traffic. Delays would increase at critical intersections, but would generally remain at acceptable levels. Exceptions would occur at the intersections of Presidio Boulevard/Lombard Street and Lombard Street/Lyon Street, where drivers would experience substantial delays. However, mitigation measures TR-2, *Lombard Street/Lyon Street Intersection Improvements* and TR-3, *Lombard Street/Presidio Boulevard Intersection Improvements* would improve operating conditions at these intersections to acceptable conditions (LOS D or better), as shown in Table 20.

The parking demand generated by the cumulative projects, including Alternative 1, is estimated to be 4,432 spaces. All of the parking demand related to cumulative projects within the Presidio would occur outside Area A, except the additional demand generated by actions at Crissy Field. The East Beach at Crissy Field would create a demand for 100 additional parking spaces (Table 21). The increased parking demand would be accommodated by the 560-space proposed supply. The land uses of Alternative 1 would comprise 35 percent of the total cumulative parking demand within the Presidio and 30 percent of the total cumulative parking demand within the project impact zone (Table 21). About 1,020 spaces of the parking demand would be that of residential units throughout the Presidio. The planned parking supply of 8,390 spaces throughout the Presidio (as described in the 1994 GMPA) would be adequate to accommodate expected cumulative parking demand within the Presidio.

Examining specific planning areas within the Presidio, parking supply in the 23-acre site within the Letterman Complex in Alternative 1 would not be adequate to support the predicted demand of 1,320 spaces, as discussed in Section 4.1.7.3. Mitigation measure TR-4, *Monitoring of Parking* would ensure that the shortfall does not result in employees or visitors to the 23-acre site seeking parking outside the Letterman Complex. In the Main Post, cumulative land uses would generate 1,030 parking spaces which, when added to the current demand, yields a demand for 1,550 parking spaces, or 230 spaces fewer than the 1,780-space supply described for Year 2010 in the GMPA.

The city has indicated that the impact of the two Lombard Street projects on parking availability would not be substantial, although neighbors have reported that very few parking spaces are available at evening hours. The projects are expected to fall just short of estimated parking demand by about four to six spaces. This unmet parking demand would mean drivers would need to compete for on-street parking in the vicinity or outside of the immediate area (including the Presidio), which, though inconvenient, would not substantially alter the

existing nature of area-wide parking conditions. The increase in attendance due to the renovation of the Exploratorium would increase the parking demand to a maximum on weekends of 520 spaces. The Exploratorium has requested use of parking (about 210 spaces) in the Presidio for peak periods utilizing shuttle buses if appropriate. The Exploratorium parking may need to be expanded to reduce the demand deficit as the Exploratorium's activities increases. Event coordination between staff of the Presidio Trust and the Exploratorium would be required to reduce concurrent demand for available parking spaces.

This alternative's contribution of cumulative traffic and parking conditions would not be considerable, and would have a minor cumulative effect on local and regional traffic growth and related congestion.

4.1.11.6 CULTURAL RESOURCES

The area of potential effect for this cumulative impact analysis consists of the Presidio and adjacent San Francisco neighborhoods. The entire Presidio is listed on the National Register of Historic Places as a National Historic Landmark district. Of the projects listed in Table 9 and shown in Figure 14, all those within the Presidio would have some effect on the historic resources which contribute to its landmark status. The undertakings would involve the rehabilitation of currently vacant buildings, replacement of non-historic buildings with compatible new construction, rehabilitation of cultural landscapes and natural landscapes, water conservation, improvements to traffic safety and efficiency, and enhancements to the visitor facilities and programs. For those buildings to be rehabilitated, a use would be selected that would require minimal alteration of the building's defining characteristics — either a compatible new use or the use for which the building was originally designed. Some historic buildings would have to be altered to accommodate new uses. The standards for rehabilitation contained in *The Secretary of the Interior's Standards for the Treatment of Historic Properties* (NPS 1992a) would set the minimum standards for proposed changes. Under Section 110 of the NHPA, all federal agencies must carry out their programs in accordance with national historic preservation policy and make efforts to minimize harm to National Historic Landmarks. Furthermore, Section 110(f) of the NHPA charges federal agencies to afford some special protection to National Historic Landmarks. Specifically, it requires that the agency "to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm" to a National Historic Landmark that may be directly and adversely affected by an undertaking. Section 106 of the NHPA requires federal agencies to take into account the effects of their actions on historic properties and seek comments from an independent reviewing agency, the Advisory Council on Historic Preservation. Adherence to the Section 106 process would avoid unnecessary harm to historic properties. For new construction, planning and design guidelines would be developed to ensure compatibility with the historic setting. All of these undertakings would involve appropriate treatments for cultural landscapes and respect for the scenic and cultural resources of the Presidio.

Letterman Complex – This alternative would contribute to cumulative beneficial effects on the National Historic Landmark district. New construction would employ a contextual approach to architecture and site planning to create a development more compatible with the existing Letterman Complex than the existing LAMC, which could be demolished under this alternative. Buildings within the 23 acres and possibly in other sites within the complex would be compatibly designed and sited to unify the historic hospital complex. Removal of the ten-story Letterman tower and restricting new construction to 60 feet in height would improve regional views of the complex from adjacent Presidio areas and surrounding neighborhoods. Restoring visual order to the complex

and reducing surface parking would also improve scenic viewing. If the existing concrete structure is removed and replaced by buildings that use materials based on character-defining elements of historic buildings found elsewhere within the complex and throughout the Presidio, the new buildings would be more compatible with the historic and visual setting than the current LAMC. However, retention of the LAIR would continue to have an adverse effect on the adjacent historic structures.

Fifteen Historic Buildings at the Main Post – This action involves the rehabilitation of 15 historic buildings for new compatible uses. It would preserve historically significant buildings through rehabilitation. The impact on the historic buildings would be beneficial. For each building to be rehabilitated, a use would be selected that would require minimal alterations of the building's defining characteristics. Some historic buildings would have to be altered to accommodate new uses (for example, historic barracks would be converted to offices) which could have an effect on the historic building fabric or materials. Modifications to historic buildings proposed by tenants that create adverse effects would be prohibited. The undertaking would be subject to the review and approval process, known as the 5x process, established between the NPS and the SHPO in accordance with the 1994 Project Agreement developed for the Presidio, in which the Presidio Trust is an active participant.[5] The review process would ensure that standards for rehabilitation contained in *The Secretary of the Interior's Standards for the Treatment of Historic Properties* (NPS 1992a) would be the minimum standard for proposed changes. In addition, actions that involve ground disturbance would be reviewed in advance, and mitigation measures to protect and record archeological resources would be implemented.

The occupancy and rehabilitation of these currently vacant buildings would improve visitor experience. An interpretive program, under development by the NPS and Presidio Trust, would provide interpretive materials throughout the Main Post and in each building lobby. Visual impacts of this undertaking would have an overall beneficial effect on the National Historic Landmark by rehabilitating the existing structures and maintaining them in good condition. The cultural landscape would be rehabilitated concurrently with building repair, and this would also be subject to the review and approval process mentioned above, resulting in improved scenic viewing and visual order at the Main Post.

Rehabilitation and Expansion of Building 99 – The Presidio Theater, constructed in 1939, is located at the corner of Montgomery Street and Moraga Avenue at the south end of the Main Post. This action would rehabilitate and potentially expand the theater for such uses. The building is listed on the Presidio National Historic Landmark as a contributing structure, therefore the undertaking would be subject to the review and approval process, known as the 5x process, established between the NPS and the SHPO in accordance with the 1994 Project Agreement developed for the Presidio, in which the Presidio Trust is an active participant (see footnote below). The review process would ensure that standards for rehabilitation contained in *The Secretary of the Interior's Standards for the Treatment of Historic Properties* (NPS 1992a) would be the minimum standard for proposed changes. In addition, actions that involve ground disturbance would be reviewed in advance, and mitigation measures would be implemented to protect and record archeological resources.

[5] Until changed or superseded, the 1994 Project Agreement developed for the Presidio between NPS and the SHPO rather than the Letterman Complex Programmatic Agreement (provided in Appendix F) applies to planning areas outside the Letterman Complex.

Any addition to the building would be subject to detailed design guidelines developed by the Trust to ensure that the addition's scale, massing, and architectural character would be compatible with the historic building to which it is being added and to the historic setting of the Main Post. Design guidelines as well as the proposed design of any additions would be subject to SHPO review and approval at appropriate stages.

Reactivation of the currently unused movie theater and any addition would provide an amenity which would enhance the visitor experience. Not only would a new theater provide entertainment for visitors, but theater space would be made available to park visitors for viewing interpretive and educational programs during the daylight hours when regular commercial programming is least active. Use of the movie theater for auditorium and meeting spaces by other Presidio tenants is also expected. Other functions included within the project scope, such as a café and an art gallery, would also provide amenities to enhance the visitor experience. Visual impacts resulting from an addition, including impacts on viewsheds and view corridors, would be minimized through careful siting and massing.

Underground Parking Structure at the Main Post – This undertaking would construct an underground parking structure at one of two possible sites within the Main Post. The Parade Ground site would be located under a portion of the main Parade Ground. The French Court site would be located under the existing parking lot between buildings 220 and 211. Either structure would be largely invisible to visitors to the Main Post, except for entrance and exit driveways. Any necessary stair or elevator towers or air intake structures would be kept to a minimum.

The undertaking would reduce or completely remove the existing 7-acre parking lot that occupies the Parade Ground, as well as reducing or eliminating smaller parking lots located throughout the Main Post. Relocation of these parking spaces to an underground structure would allow restoration of the historic Parade Ground, which would result in a beneficial effect on the National Historic Landmark district. At present, parked cars dominate the landscape and obscure visitors' understanding of the Parade Ground's historic use. Returning the Parade Ground to its historic appearance would be central to a cultural landscape rehabilitation of the Main Post. Removing smaller surface lots would allow greater options for landscape rehabilitation in various locations around the Main Post.

The undertaking would result in improved scenic viewing and enhancement of the visitor experience by locating cars out of view. Visitors would experience a setting that more closely resembled the historic appearance of the Main Post and views to the historic buildings. Primary scenic views, such as those to the bay, would also be improved. With the restoration of the Parade Ground, recreational and interpretive opportunities would increase with the creation of a car-free open space that would provide for a multitude of uses by visitors and by NPS interpretive staff.

At either site, ground disturbance associated with their construction could encounter archeological remains. The Main Post is considered an area of archeological sensitivity, with several predicted historic archeological features listed as contributing features to the National Historic Landmark district. An Archeological Management Assessment and Monitoring Program would be developed to protect, evaluate, and record historic features that were uncovered during the project. Appropriate consultation with Native American groups in

accordance with the NHPA and the Native American Graves Protection and Repatriation Act would be carried out. The design and siting of the underground parking structure would be subject to the requirements of Section 106 of the NHPA. The design of entrance and exit driveways and ramps, and all attendant visible structures would be carefully evaluated during the Presidio Trust's design review and compliance process to avoid adverse impacts on the historic setting.

Public Health Service Hospital (PHSH) Complex – As part of this undertaking, the non-historic front addition to the PHSH may be removed, and the historic front façade rehabilitated and possibly restored. Building 1801 (the hospital) is listed as contributing to the significance of the district, but with marginal integrity because of its non-historic addition. Removal of the addition and rehabilitation of the façade would have a beneficial effect on the integrity of the original hospital building. If the large parking lot north of building 1801 and other pavement and non-historic structures throughout the site are removed, it would allow for the restoration of the historic setting. These actions would have a beneficial effect on the district.

If a suitable tenant for the hospital complex is not found, the hospital building might be demolished. The Presidio Trust would first consider an array of alternatives to demolition of historic buildings. Modifications proposed by prospective tenants that create an "adverse effect" would be discouraged. If a proposal can demonstrate that it supports the achievement of other park purposes and that these purposes outweigh the requirements of historic resource protection, then modifications that cause an adverse effect may be proposed and addressed through the Section 106 process. The Section 106 compliance for the PHSH Complex would occur through a Memorandum of Agreement following identification of the preferred alternative. New building construction, including additions to buildings, would adhere to site-specific planning and design guidelines to be made available for public review and comment. Measures identified in the guidelines would ensure that building removal and new construction would not have an adverse effect on the district. The guidelines would direct all replacement construction and set forth in further detail review processes for replacement construction of buildings (e.g., massing, scale, heights, roof forms, colors, materials). A copy of these guidelines would be sent to the State Historic Preservation Officer for review. Additional measures may be imposed during preparation of the NEPA environmental analysis and Section 106 consultation under the NHPA.

Little is known about the extent, nature or location of artifact caches and the integrity of prehistoric and historic archaeological deposits at the site. The removal of structures and pavement, replacement construction, upgrading of utilities, and hazardous material remediation might adversely affect remains. One known identified resource (Marine Cemetery) and the following areas of archeological sensitivity were identified within the PHSH Complex during re-documentation of the National Historic Landmark district by the NPS prior to preparation of the GMPA EIS. The areas were identified based on trenching by the Army (Marine Cemetery only) and predictive modeling and were devised to be more intensively scrutinized or monitored if ground disturbance would occur within the site. While historic archeological sites would already be a part of the National Historic Landmark district and would not require separate nomination to the National Register of Historic Places, prehistoric sites would require separate nomination or eligibility assessment because they are distinct from the military-based definition of the landmark district:

- *PHAF-34 (Marine Hospital and Cemetery)* – An area of sensitivity, including historic features associated with squatters or farmers (?-1869), the earlier construction of the Marine Hospital, outbuildings, historic refuse deposits (1875-1932) and the Marine Cemetery (1885-). Of these, the Marine Cemetery has been relocated. A documented 585 burials were interred at this site between 1885 and 1912 composed of merchant marines from a myriad of international ports. The site is located to the north of the PHSH beneath approximately 13 to 15 feet of construction rubble.
- *PHAF-10 (Lobos Creek Water Control)* – Remains are expected in this area of the Hotalling Tunnel, and parts of early water supply systems connecting Mountain Lake to the Spring Valley Water Works on Lobos Creek (1857-?).
- *PPAF-3 (Mountain Lake)* – This water source and the surrounding area have high potential for prehistoric archaeological sites but no documented incidence of discovery.

Since preparation of the GMPA EIS, NPS and Presidio Trust archeologists have also indicated that there is the potential for re-locating the temporary encampment used in the spring of 1776 by a Spanish expedition lead by Juan Bautista de Anza in the area adjacent to Mountain Lake prior to establishment of El Presidio de San Francisco in the Main Post area that summer.

An Archeological Management Assessment and Monitoring Program would be conducted for all undertakings at the PHSH Complex. The AMA and Monitoring Programs would ensure that all planned undertakings would be reviewed by a qualified archeologist prior to their implementation. Construction projects and ground-disturbing activities would be closely observed in the vicinity of sensitive archeological areas to discover, document, protect, and manage the archeological record of the Presidio. An inventory study of known archeological sites in the area of each undertaking including test excavations, as appropriate, would be conducted to determine whether significant sites or historic features are extant and whether construction might adversely affect archeological resources. Reports of any investigations would be submitted to the SHPO and the ACHP. A phased inventory, evaluation, monitoring, and treatment program for archeological resources regarding ongoing maintenance and construction in the complex would be conducted. The discovery of any human remains or associated mortuary items covered under the Native American Graves Protection and Repatriation Act would be treated in accordance with 43 CFR 10.4 (Inadvertent Discoveries). Consultation and work would be conducted in accordance with the Programmatic Agreement (Appendix F to the EIS).

The PHSH Complex, on the Presidio's southern boundary, is physically and visually distinct from other areas in the Presidio. Although not high in visual quality, the complex, particularly the south-facing façade of the modern addition, is visible from some regional viewpoints. Removal of the hospital addition would enhance the visual continuity of the 1930s structure and result in a visual scale more appropriate to the surrounding neighborhoods. Should the 1952 addition to building 1801 not be removed, the building would not be returned to a smaller scale, and views from vantagepoints in adjacent neighborhoods would remain the same as at present. Removal of other non-historic buildings (including building 1803) and the large parking lot north of building 1801 would increase the integrity of the historic setting.

Removal of non-historic forest for native plant restoration would help reestablish scenic vistas and open up views of the complex's scenic qualities to the north. The removal of any additional buildings also has the potential to enhance scenic viewing. However, replacement construction might adversely affect scenic views. Therefore, careful design and siting, building height restrictions, compliance with site-specific planning guidelines and additional analysis would be required to minimize impacts on the integrity of the historic setting and scenic views.

Two Playing Fields – Rehabilitation of two playing fields in the West Cantonment area of the Presidio, Morton Street field and Paul Goode field, has improved the appearance and functionality of both playing fields, including such features as parking areas, fencing, and pedestrian paths. Neither playing field is listed as a contributing feature to the National Historic Landmark, but both are adjacent to and visible from both historic and non-historic housing areas. These improvements have enhanced the visual setting of the Presidio.

Presidio-Wide Housing – The gradual leasing of both historic and non-historic housing units throughout the Presidio has served to protect the resource itself, as well as revitalized the residential areas. This has improved safety and maintenance and has brought activity back to formerly vacant areas. There are 12 clusters of historic housing, containing 301 housing units, approximately 27 percent of the total housing inventory. The largest concentration of historic residences is located on Liggett and Portola streets. Many of the historic residences have amenities typically found in older housing prototypes, including decorative fireplaces, expansive views, ample open space and front porches or stoops along small neighborhood streets. The landscape and many site features not only contribute to the National Historic Landmark, but also establish the character of the individual housing clusters. The Presidio Trust participates in the process established by the 1994 Project Agreement between the NPS and the SHPO (known as the 5x process) to review and approve all projects on historic buildings to ensure rehabilitation in accordance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*. The majority of the historic housing units which have been reviewed to date are classified as "make-ready" projects, meaning only minor painting, patching and mechanical system upgrades are executed. Substantial rehabilitation on historic housing units, which would include major work such as seismic upgrading, would involve submission of full plans and specifications for review to the SHPO and NPS. In each case, character-defining features would be protected and retained, aggressive physical treatments which could damage historic features would be avoided, and mitigation measures would be developed to protect archeological resources. Residential rules have been enacted that would protect the buildings and their landscapes from inappropriate occupant modifications and treatments, resulting in beneficial effects on the National Historic Landmark. Scenic qualities and visitor experience would also be improved by the rehabilitation, occupancy and maintenance of residential units.

Water Reclamation Plant – The water reclamation plant may be located inside an existing vacant warehouse or similar open-plan building type to minimize the need for building alternations. The two different treatment systems being considered are compact and would occupy only about 1,600 square feet. Selection of an appropriate building to house the plant, and the rehabilitation treatments proposed would be subject to the review process described above regarding housing. Rehabilitation of a historic building for this new use would be done in accordance with *The Secretary of the Interior's Standards for the Treatment of Historic Structures*. The rerouting of underground utility lines to the new processing area would involve ground disturbance that

could impact archeological resources. The layout of underground systems would be designed to minimize impact on these resources.

Crissy Field – Crissy Field is one of the many discrete areas of the Presidio that contribute to the National Historic Landmark. This undertaking includes several different actions: restoration of Crissy Field airfield, re-establishing of a tidal marsh with beach and dunes, restoration of old Mason Street, rehabilitation of historic building 603 as the Community and Educational Center, planting of trees along Mason Street, construction activities in the vicinity of old railroad track, and potential disturbances of archeological resources. The Project Agreement reached between NPS and SHPO in 1994 addresses the effects of this project on the historic features within Crissy Field.

The existing airfield site includes multiple layers of construction representing continual expansion through time. The airfield restoration period would return it to its 1920–1930 appearance and create opportunities to enhance the historic qualities of the airfield and to provide educational and interpretive benefits. It would enhance the historic setting for structures and landscape features outside the Crissy Field area because the restoration would provide a better context for appreciation of the air base as a whole. Restoring the airfield is considered a beneficial impact.

For each of these actions, those that involve ground disturbance are likely to encounter archeological remains. The general location of many of these remains is known and was incorporated into the design to avoid affecting specific areas known to contain archeological resources. Documentary research and test borings have been and would continue to be required prior to beginning any work. As an example of how this has operated, the original design of the tidal marsh was modified during construction in order to avoid archeological remains found on the site. An archeological monitoring program has been in place during construction to evaluate and record historic features that were uncovered during the project. Appropriate consultation with Native American groups in accordance with the NHPA and the Native American Graves Protection and Repatriation Act was carried out.

Originally built in 1920, Mason Street was realigned between 1946 and 1963. This undertaking would result in the street's restoration by returning it to its historical alignment, providing better continuity and context for the Crissy Field historic setting, thereby enhancing the restoration of the airfield. Planting of trees at Mason Street near the gate would fill a spatial void left by the 1992 demolition of the former commissary building. The former linear quality of the entrance would be restored with this grove of trees in a manner more appropriate to a major entrance to the former military base and national park. Construction activities in the vicinity of the historic railroad tracks along Mason Street would be conducted to avoid harming these remnant tracks. They would be covered with asphalt or soil to protect them from future disturbance. No adverse effects are expected, and no additional mitigation is necessary.

The undertaking would result in increased opportunities for recreation and scenic viewing. The rehabilitation of the Torpedo Wharf, a new rest area at Crissy Field beach, and the Community and Environmental Center would provide concessions, public restrooms and other interpretive and visitor services. In addition, the Community

and Environmental Center would involve rehabilitation of a historic structure which has long been vacant. This would improve the historic setting by redeveloping the building for public use.

The Crissy Field shoreline promenade, restored dunes and beaches, and the family picnic area would create significant improvements to recreational and scenic viewing opportunities for the Presidio. When this action is complete, the San Francisco Bay shoreline from Fort Point to the Embarcadero would be an almost continuous promenade, open and accessible to the public.

William Penn Mott, Jr. Visitor Center – Building 102, on the Main Post, has been designated to serve as the Presidio's visitor center. Not only would this undertaking result in a rehabilitation of the historic structure, it would also create a revitalized visitor center and museum to better meet the needs of Presidio visitors. Building rehabilitation would be reviewed and approved to ensure compliance with the *Secretary's Standards for the Treatment of Historic Properties*, and would have a beneficial effect on the historic setting, and the interior program improvements would improve the visitor experience.

Exploratorium – The Exploratorium is located within the Palace of Fine Arts, which adjoins the Presidio and is the last remaining structure of the 1915 Panama Pacific International Exposition. The temporary structure survived until 1962, when the Beaux Arts rotunda and colonnade were re-created in concrete from castings of the original ornamentation. The building and grounds are owned by the city, and managed by its Department of Parks and Recreation. The Palace of Fine Arts is designated as a city landmark (Landmark #88). As a publicly owned landmark, the Exploratorium's improvement program would be required to conform to the provisions of Article 10 of the City Planning Code that encourage and achieve historic preservation. This would include the filing of a Certificate of Appropriateness for the work proposed (including proposed changes in major interior architectural features) accompanied by plans and specifications for proper consideration for review by the city's Planning Department and Landmarks Advisory Board. Ground disturbance during construction has the potential to disturb archeological resources; therefore, the services of an archeologist would most likely be required. Review and issuance of the Certificate of Appropriateness by the Planning Department, with the advice of the Landmarks Advisory Board, and mitigation to protect archeological resources would ensure that the Exploratorium's improvement program would not have a significant impact on or be potentially detrimental to the landmark site.

2361 Lombard Street – The location of this proposed action along the Lombard Street corridor within the Marina district, neither of which has been designated by the city as a historic district. The action would entail the demolition of several existing buildings: the Lanai Motel, the Bakers Square Restaurant, Wong's Auto Repair, and the flower stand. None of these structures is considered by the city as a landmark site or otherwise deemed as having any special character or special historical, architectural or aesthetic interest or value worthy of preservation. The action would not conflict with the historic preservation of buildings subject to the provisions of Article 10 of the City Planning Code. However, the action would have the potential to unearth archeological resources during excavation because the action is located next to the historic bay margin and slough known to potentially contain aboriginal artifacts and skeletal remains. In addition, there is potential for the existence of buried material associated with the historic use of the property as dwellings and a store at the turn of the twentieth century. To assure some protection of the material and data in the event resources are

discovered during excavation, mitigation requiring the monitoring of excavation activities by an archeologist would be performed. Thus, onsite investigations by an archeologist, and/or documentation, preservation, and recovery of cultural material would avoid potential significant effects of the action on cultural resources.

The action would not obstruct currently available scenic views from public areas.

1880 Lombard Street – This action is also located along the busy, commercial Lombard Street corridor, and would involve the demolition of the current Jack-in-the-Box restaurant which has not been found worthy of preservation. The action would not conflict with the historic preservation of buildings subject to the provisions of Article 10 of the City Planning Code. However, it is located in close proximity to what was San Francisco's historic northern shoreline which was likely occupied by Native Americans (or Ohlone people) prior to the appearance of Europeans. Therefore, the city has determined that there is a possibility of finding cultural resources during excavation, and mitigation requiring that a qualified archeologist monitor the site during excavation is necessary. Retaining the services of an archeologist would ensure that no significant impact to any cultural artifacts would occur.

Although there would be a change on the project site from one single-story, 2,300-square-foot building to the proposed 60,600-square-foot building, the city has determined that this would not result in a substantial, demonstrable negative aesthetic effect. The height, bulk, and design of the proposed building would be within the range of designs for other buildings in the vicinity of the site. The action would not degrade or obstruct any scenic view or vista now observed from a public area. Finally, neighbors have commented that the current use of the site (a restaurant with a drive-through) contributes to sanitation and rodent problems to the area, as well as a high level of motorist and pedestrian activity, and related nuisances. Therefore, discontinuation of the current use may enhance the visitor experience within the neighborhood.

Electronic Toll Collection, Golden Gate Bridge – The toll booth plaza and the bridge itself are administered by the Golden Gate Bridge, Highway and Transportation District. The Golden Gate Bridge and the Roundhouse, used as a gift shop, date from 1937 and are determined to be eligible for the National Register. The toll booth plaza is from a more recent time period and is not considered eligible. The electronic toll collection system requires visible hardware to scan electronic passes and record vehicles passing through the toll lanes, as well as signage mounted on the toll plaza canopy. This equipment would have a negligible effect on the historic bridge and the Roundhouse.

Doyle Drive – This action would impact sensitive areas such as archeological sites and historic building and military batteries. In addition, Doyle Drive itself is eligible to be listed on the National Register, and appears as a contributing feature to the Presidio National Historic Landmark.

The proposed action traverses several areas of highly sensitive archeological resources. In accordance with Caltrans and FHWA Section 106 guidance, archeological resources in the vicinity of the project would be inventoried, evaluated and consolidated into an Archeological Survey Report as part of Section 106 consultation with FHWA and SHPO. Historic structures, including sections of Doyle Drive itself, may be displaced by replacement alternatives or construction staging areas. An Historic Architectural Survey (HASR) and an

Historic Resources Evaluation Report would be prepared in accordance with Caltrans and FHWA standards. Effects to the historic resources would be determined consistent with federal and state requirements.

The existing structure blocks views to the bay and the Palace of Fine Arts and forms a barrier dividing Crissy Field and the upland portions of the Presidio. Its effects on scenic viewing would be evaluated following FHWA Visual Impact Assessment guidance. Design options for alternatives would incorporate the aesthetic qualities of a parkway as envisioned by a Doyle Drive Task Force. The action is intended to improve the aesthetic qualities of the existing structure and the visual setting surrounding it. Alternatives to the action would result in changes to the visual environment. Visual analyses would document the potential for alternatives to have negative or positive effects on the visual environment. The action is also intended to enhance access to Presidio recreational areas, such as the Crissy Field restoration, and areas of new leasing and development activity, such as the Main Post, Letterman Complex, and housing areas. By improving the aesthetic, scenic and design qualities of the existing structure, and by improving access for Presidio users, the action has the potential for considerable beneficial effects to the area.

Conclusion – The cumulative impact of Alternative 1 combined with the other known undertakings may produce individual adverse effects on features of the affected area, but would have an overall beneficial effect. Rehabilitation of historic structures and cultural landscapes, and new compatible construction would enhance the historic setting. Compliance with the NHPA, *The Secretary of the Interior's Standards for the Treatment of Historic Properties*, Article 10 and 11 of the City Planning Code, and other standards for preservation of cultural resources, would ensure that appropriate rehabilitation of historic buildings and landscapes is achieved. Visitors' experience would be enhanced by new visitor facilities and interpretive materials that bring the Presidio's cultural resources to life, while the Crissy Field wetland and the environmental education center would showcase its natural resources. Opportunities for recreation would increase. Both historic and non-historic military housing would once again be occupied and maintained. Doyle Drive would be redesigned or improved for faster, safer vehicular traffic, providing better access to the Presidio for recreational users, park visitors, and those who live and work at the Presidio. Visual and scenic qualities would improve because of the cumulative effects of these undertakings, which would increase open space, rehabilitate buildings and landscapes, and create compatible new construction in the area.

4.1.11.7 AIR QUALITY

As discussed in Section 4.1.9, a significant cumulative impact would be caused if the proposed development would not conform to the applicable regional air quality management plans. Conformity with the State Implementation Plan and the Clean Air Plan is discussed in Section 5.4.2. The BAAQMD's region-wide planning efforts aim to manage emissions and allow for growth in the region while avoiding further violations of the ambient air quality standards. An evaluation of a project for conformity with the applicable implementation plans is an assessment of whether the project is accounted for in the forecasts of regional air emissions used in preparing the plans. If a project is found to be in conformity with the implementation plans, its contribution to regional cumulative air quality has been accounted for.

Proposed development under Alternative 1 and the projects identified in Table 9 would contribute to a cumulative increase in vehicle trips on the region's roadways and would contribute to cumulative increases in

regional emissions. The cumulative operational emissions would cause localized impacts at congested intersections in the vicinity of the projects, but the resulting impacts would not be expected to cause local violations of ambient air quality standards. Expected cumulative increases in vehicle trips would also result in increases to region-wide emissions of ozone precursors (including NO_x and ROGs) and CO. With the exception of NO_x, the proposed development would cause emissions of ozone precursors that fall below the thresholds set forth in federal regulations for conformity determinations (as shown in Table 22). Because emissions of ozone precursors would be less than the applicability thresholds, a conformity determination is not necessary for ozone. Emissions of CO that would be caused by the cumulative scenario under Alternative 1 are accounted for in the current maintenance plan for CO, as discussed in Section 5.4.2. Because the projects are in conformance with regional air quality plans, no further conformity analysis is necessary, and no significant cumulative impacts would occur.

4.1.11.8 NOISE

Demolition and construction activities that could occur under Alternative 1, in combination with the project to reconstruct Doyle Drive, would cause short-term cumulative noise impacts if the two projects were to be under construction at the same time. Long-term cumulative impacts around the Letterman Complex would primarily result from increased traffic on Doyle Drive (U.S. Highway 101). These impacts were discussed in the GMPA Final EIS. The long-term cumulative effect of Alternative 1 and other projects within the Presidio and nearby portions of San Francisco would be increased traffic noise on most of the roads internal and external to the Presidio.

Because the surroundings are dominated by traffic noise in the existing conditions, approximately two-fold increases in traffic would have to result from cumulative development in order to cause increases in traffic noise that would be noticeable to most people. Cumulative development with Alternative 1 would cause peak-hour traffic increases along Lombard Street, inside the Presidio, that could result in noticeable noise increases, but no noise sensitive receptors are located along this segment. None of the roadway segments near noise sensitive receptors would experience greater than two-fold peak-hour traffic increases. The conclusion in the GMPA Final EIS that long-term cumulative traffic-induced noise levels would increase due to increases in vehicle volumes remains applicable; however, the increases near sensitive receptors would not be considered significant. No significant cumulative noise impacts are expected.

4.1.12 Unavoidable Adverse Effects

The impacts that follow are identified as potentially significant and for which there are no mitigating measures or that would not be mitigated to a level of insignificance.

Cultural Resources – Retention of the LAMC would only allow for the partial restoration of the historic setting of the earlier hospital complex and significant streetscapes. Therefore, the building would continue to have an adverse effect on the adjacent historic hospital. In addition, the visual integrity of the Letterman Complex would continue to be diminished and regional views would remain significantly affected.

Air Quality – The air quality modeling indicated that the level of NO_x emissions would be significant based on the BAAQMD's significance thresholds for NO_x of 80 pounds/day.

Noise – Short-term impact tool use and demolition activities would be a source of increased noise to occupants and passive recreation users within the Letterman Complex. Mitigation measures proposed to reduce intrusions would reduce noise impacts, but not to a level of insignificance to those closest to (i.e., within 250 feet from) construction equipment.

4.1.13 Relationship of Short-Term Uses of the Environment and Maintenance and Enhancement of Long-Term Productivity

Use of the site for research and education would preclude other long-term management possibilities for the Letterman Complex. This use would occur within an intensively used area within the northern part of the Presidio which would allow areas in the south and along the coast to remain more natural and experience less activity and development. Reinforcement of this overall use pattern would minimize impacts on the productivity of park resources.

Use of the site for a science and education center would not affect any park ecosystem. Improvements to existing infrastructure would be considered sustainable actions that are expected to improve the operation of systems. Through implementation of the Planning Guidelines, the Presidio Trust would promote environmental protection and sustainable design and encourage technologies and practices that would reduce environmental impacts or produce environmental benefits in water conservation and reclamation, energy conservation, and transportation.

4.1.14 Irreversible or Irretrievable Commitments of Resources

The science and education center would be designed and constructed to minimize consumption of energy and development of non-renewable fuels. Renewable sources of energy and new developments in energy-efficient technology, including recycling of materials and waste, would be fully explored and implemented to the extent possible. Although new development could be restored to previous conditions over time, the use of land, construction materials, energy, and financial resources to implement the alternative would, in a practical sense, be an irretrievable commitment of resources.

Archeological resources would be avoided where possible and historic resources would be protected. Where this was not possible, disturbance would be mitigated through recovery of cultural information and significant artifacts.

4.2.1 Consistency with Approved Plans and Policies

4.2.1.1 GENERAL OBJECTIVES OF THE GMPA AND PURPOSES OF GGNRA ACT

Alternative 2 is consistent with the General Objectives of the GMPA, which are identified in Section 1.1.5 of this document. Foremost, it is consistent with the General Objective of sustaining the Presidio indefinitely, both economically and physically, through the development team's organizational and financial capabilities to undertake capital investments, operate programs, and make contributions to help preserve the park's unique historic and natural qualities. This alternative is consistent with meeting the Trust Act's financial self-sufficiency mandate and the requirement that the Trust give priority to tenants that enhance the financial viability of the Presidio.

Removal of both the LAMC and LAIR buildings, modern structures that block view corridors and are architecturally non-distinctive, would be consistent with the General Objective of the GMPA to enhance the scenic resources of the Presidio. Removal of LAMC and LAIR would also contribute to the General Objective of enhancing the Presidio's cultural resources by assisting in restoring historic settings to permit an understanding of the site's significance to the National Historic Landmark district. In furtherance of this General Objective, design and siting of new construction would promote the enhancement and rehabilitation of scenic vistas, including views to the Palace of Fine Arts. New construction to replace the monolithic and architecturally non-distinctive buildings with those better tailored to the mass, scale, color, and materials of other structures in the Letterman Complex and the Presidio would be in keeping with the historic character and integrity of the historic setting. Consistent with the General Objective to provide for uses that involve stewardship and sustainability, replacement construction would promote principles of sustainable design and technology. Furthering this objective, hand-dismantling and salvaging of materials prior to building demolition and conservation and recycling strategies to be employed within the buildings and by tenants would promote and demonstrate conservation practices, including waste reduction and recycling.

This alternative is also consistent with the General Objective to provide for appropriate uses of the Presidio. Alternative 2's institutional health and research tenants, including the institute of aging, institute on eastern medicine, and culinary institute, would be consistent with the GMPA's General Objective to provide for uses that involve health and scientific discovery, education, research, and innovation. Other tenants and programs offered by this alternative, including the cross-cultural education center and the international center, would be consistent with uses that involve cross-cultural cooperation, international exchange, and communication. In addition, the provision of housing would enhance the General Objective to increase open space in other parts of the park while sustaining the Presidio economically.

Alternative 2 is also consistent with the GMPA's General Objective of addressing the needs of Presidio visitors, tenants, and residents. The provision of housing would enhance this General Objective. In addition, installation of the water treatment and urban agricultural facilities, as well as tenant programs to reduce automobile use and parking demand, would be consistent with the General Objective of the GMPA of meeting tenant and resident needs while minimizing impacts on neighboring communities.

Alternative 2 is consistent with the purposes of the GGNRA Act, which are identified in Section 1.1.5 of this document. Primarily by focusing more intensive use into an area that has been previously developed, Alternative 2 preserves the recreation area as far as possible in its natural setting. New construction would be subject to sound land use planning, including implementation of the Planning Guidelines and design review, so that it would not degrade scenic views and the natural setting.

4.2.1.2 PRESIDIO GENERAL MANAGEMENT PLAN AMENDMENT

This alternative is also consistent with a number of the more specific goals and planning principles of the GMPA. This alternative would foster the GMPA's proposed major directions for the future of the Presidio by perpetuating the site as a building and activity core. New construction would replace the LAMC as permitted under the GMPA since the LAMC would not meet essential program and management needs.

In certain respects, Alternative 2 does not match the GMPA's site-specific plan. This alternative would not promote the GMPA concept for infill construction within the complex but would focus replacement construction within a 23-acre site. Because replacement construction would occur within only a portion of the potential sites that were identified on a preliminary basis as referenced in the GMPA (i.e., outside the historic hospital complex), the alternative would not reinforce the historic hospital complex's courtyard as encouraged by the GMPA. Whereas the GMPA assumed rehabilitation and reuse of LAIR, demolition of the LAIR and other existing buildings that have been demolished or are designated for demolition so as to allow new replacement construction would also increase the total amount of gross square feet of replacement construction within the complex as envisioned in the GMPA from 503,000 to approximately 900,000 square feet. Nevertheless, the GMPA's key restrictions on maximum allowable square footage for the complex (1.3 million square feet) and maximum allowable height of new construction (60 feet) would not be exceeded by this alternative. Furthermore, replacement construction would proceed in accordance with the Planning Guidelines (as provided in Appendix B) and design review as recommended within the GMPA to ensure that new construction would be compatible with the adjacent historic buildings and patterns of development.

Alternative 2's institutional health and research tenants, including the institute of aging, institute on eastern medicine, and culinary institute would, consistent with the specific program goals of the GMPA, assist in making the Presidio a center for research and learning. Programs conducted at the institute of aging would advance intergenerational and collaborative approaches to problem solving and provide opportunities for skills development and lifelong learning. Provision of housing would support the GMPA's specific long-term goal of clustering housing opportunities near and within the park's work and major activity centers. In addition, the inn/retreat, which would include meeting space for local community organizations, would be consistent with the GMPA's specific objective to provide accommodations for visitors to create a lively community that contributes to the site. Provision of limited retail facilities and services within walking distance of housing, including the restaurants, spa, and child care facility, would reinforce the GMPA's neighborhood concept.

Alternative 2 would not, however, implement the specific proposal in the GMPA for the Letterman Complex to serve as a science and education center devoted to issues of health, life and earth sciences. Because to date no suitable tenant has been identified for the site that would adhere to the GMPA's specific proposal, this potential

land use conflict cannot be resolved. However, mitigation measures identified in Section 4.7 would be implemented to lessen adverse environmental impacts of this alternative.

4.2.1.3 SAN FRANCISCO GENERAL PLAN

While the Presidio is not subject to the *General Plan*, Alternative 2 would be consistent with *General Plan* policies of including housing in business developments. This alternative would also be consistent with the *General Plan* guideline to locate overnight accommodations in districts with an overconcentration of hotels at least 300 feet from any existing hotel, motel, or bed and breakfast establishment. However, it may not be consistent with the policy to restrict business activities of city-wide importance to districts devoted to and designated for business services.

4.2.2 Solid Waste

The LAMC is estimated to contain approximately 35,400 tons of concrete and the LAIR contains approximately 37,000 tons of concrete. Approximately 5,770 tons of concrete are contained in the building piles and pile caps. Together, these buildings are estimated to contain approximately 80,000 tons of concrete, or 143,000 cubic yards of material.

For the purposes of this impact assessment only, the analysis focuses on the "worst case" scenario (disposal of demolition materials offsite and no onsite or offsite recycling) and assumes that all debris generated by the demolition of the LAMC would be sent to a landfill and disposed of without recycling. It must be noted that the Presidio Trust is committed to diverting at least 50 percent of the project's demolition waste stream from landfill sites by salvage and reuse in order to promote and demonstrate conservation practices in waste reduction and recycling.

4.2.2.1 DISPOSAL OF DEMOLITION DEBRIS OFF SITE

Due to the demolition of both the LAMC and LAIR buildings, Alternative 2 would generate 80,000 tons of construction debris. This represents 44,600 (55 percent) more tons of debris than Alternative 1. This estimate (assuming no recycling at all) represents just over 1 percent of the 6.6 million tons total volume of waste disposed of in the nine-county Bay Area in 1997 (California Integrated Waste Management Board 1997). The impact of disposing this building debris was analyzed with respect to the following solid waste sites located in the Bay Area that are likely to receive the material:

- Redwood Sanitary Landfill in north Marin County
- Altamont Sanitary Landfill in east Alameda County
- Zanker Road Landfill in Santa Clara County

The operator of Redwood Sanitary Landfill in north Marin County and Altamont Sanitary Landfill in east Alameda County indicated that the landfill sites have sufficient capacity to handle the debris (personal communication with Paul Yamamoto, Alameda County Division Manager, Waste Management Inc.). In the case of the Altamont Sanitary Landfill, the total volume of the LAMC and LAIR debris (without recycling)

would represent just over 5 percent of its annual total tonnage (1997 totals). In the case of Redwood Sanitary Landfill, the 80,000 tons of debris would represent approximately 29 percent of its annual tonnage (1997 totals). Both of these estimates assume no recycling of LAMC and LAIR demolition debris.

The operator of Zanker Road Landfill stated that the LAMC and LAIR demolition debris would not affect the capacity of the landfill (personal communication with Paul Lineberry, Landfill Engineer). Should Zanker Road Landfill recycle none of the debris, the 80,000 tons would consume just over 9 percent of the landfill's total annual permitted capacity.

Based on these estimates, the debris that is estimated to result from demolition activities under this alternative is considerable, but represents a small portion of the solid waste sent to disposal sites within the Bay Area in one year. Given the responses from various operators of regulated landfill sites within the region, the volume of demolition debris from the LAMC and LAIR would not adversely affect the capacity of solid waste landfill sites in the Bay Area. Furthermore, to the extent that Presidio Trust conservation goals are implemented and waste reduction and recycling of building debris are instituted at the site, and the receiving landfill(s) implement their standard construction debris waste stream diversion practices, the quantity of debris directed to the landfill sites would be reduced by at least 50 percent. Therefore, demolition of the LAMC and LAIR is expected to result in a less-than-significant impact on regional solid waste disposal facilities.

4.2.3 Water Supply and Distribution

4.2.3.1 IMPACTS OF WATER CONSUMPTION ON BASELINE

This alternative would demand approximately 111,000 gpd of domestic water (Tables 12 and 13). This estimate includes recycling of 14,000 gpd of gray water or reuse of storm-water runoff for irrigation purposes. The estimated water consumption would exceed the 89,000-gpd baseline estimate for the site by 22,000 gpd. Therefore, as compared to the baseline, the demand for water under this alternative would have a negative effect on the Presidio water supply. The development team would be required to adopt water conservation measures implemented by the Presidio Trust and described in mitigation measure WS-2, *Water Supply- and Demand-Side Solutions to Reduce Cumulative Impacts* to reduce water consumption below 89,000 gpd.

4.2.3.2 IMPACTS ON FIRE FLOWS

Improvements to the water distribution system may be required to ensure adequate fire flow to new development with the Letterman Complex to meet the Uniform Fire Code, depending on the characteristics of buildings to be constructed (see mitigation measure WS-1, *Fire Flows*).

4.2.4 Schools

4.2.4.1 IMPACT ON CAPACITY AT EXISTING OR NEW SCHOOL SITES

Alternative 2 would generate 253 schoolchildren who would enroll in SFUSD schools (Table 14). The SFUSD Education Placement Center, the office responsible for managing enrollment and placing children within SFUSD schools, stated that these schoolchildren, who are likely to attend schools in the neighborhoods

surrounding the Presidio, would not require the SFUSD to develop new capacity within existing or new school sites (personal communication with Margaret Wells, Program Director of the Education Placement Center). Because this level of enrollment is within the existing capacity of SFUSD, Alternative 2 is not expected to result in an adverse impact on SFUSD schools.

4.2.5 Housing

4.2.5.1 INCREASE IN HOUSING DEMAND

At buildout, the additional regional housing demand created by employment associated with Alternative 2 would be 385 housing units (Table 15). The Presidio housing stock, including the proposed 300 to 400 units to be constructed onsite, would accommodate 100 percent of this housing demand. Because the housing demand under Alternative 2 generated by new employees from outside the Bay Area can be accommodated at the Presidio, this alternative would not adversely impact the housing market within the city of San Francisco and the surrounding Bay Area.

4.2.6 Medical Research

4.2.6.1 IMPACT ON MEDICAL RESEARCH

Under Alternative 2, a portion of the site would be leased to a tenant for senior health care facilities that would include research on aging. Thus, the alternative would have a positive impact on medical and life science research by providing research space at the site.

4.2.7 Traffic and Transportation Systems

Under Alternative 2, the existing roadway network within the 23-acre site would be modified so that Torney Avenue would be extended to intersect with Lombard Street and replace Letterman Drive as a continuous connection between Lombard Street and Lincoln Boulevard. Letterman Drive would extend from both Lombard Street and Lincoln Boulevard to dead-end within the site. Improvements to the intersection(s) of Lyon Street/Richardson Avenue/Gorgas Avenue would allow for left turns into the complex from westbound Richardson Avenue. The Gorgas Avenue Gate would be the primary entrance, with the Lombard Street Gate serving as a secondary entrance. Alternative 2 would also include improvements to the pedestrian and bicycle circulation network within the complex, as well as improved connections to adjacent areas. Alternative 2 proposes a total of 1,020 parking spaces within the 23-acre site.

4.2.7.1 ADDITIONAL TRAFFIC VOLUMES

Alternative 2 would generate 4,280 external (i.e., to areas outside the Presidio) weekday daily vehicle-trips, and 520 vehicle-trips during the p.m. peak hour into and out of the Presidio (Table 16). The combination of the housing, research/development and retreat uses would result in an equal directional distribution of p.m. peak-hour vehicle-trips, with 250 outbound trips and 270 inbound trips (Table D-9 in Appendix D). The trip generation levels used assume that the inn/retreat would function largely as a longer-stay conference facility.

Between existing and 2010 conditions, the Mason Street Gate would experience an increase of 360 vehicles during the p.m. peak hour, with project-related traffic comprising 17 percent of this increase. The project would contribute the majority of the traffic volume increase at the Gorgas Avenue Gate. Traffic volumes at this gate would increase by 540 vehicles during the p.m. peak hour, with the project-generated traffic comprising 63 percent of this growth. The existing p.m. peak-hour traffic volumes at the Lombard Street Gate would be increased by 400 vehicles. Thirteen percent of this increase would be due to Alternative 2. The existing p.m. peak hour traffic volumes at the Presidio Boulevard Gate would increase by 220 vehicles, with project-generated traffic comprising 32 percent of this increase (Table 17).

4.2.7.2 IMPACTS ON INTERSECTION OPERATING CONDITIONS

Currently, during the p.m. peak hour, two of the study intersections operate at LOS C, four intersections operate at LOS B and one intersection operates at LOS A (Table 4). Under Alternative 2, three of the study intersections (Presidio Boulevard/Letterman Drive/Lincoln Boulevard, Mason Street/Marina Boulevard/Lyon Street and Doyle Drive/Marina Boulevard/Lyon Street) would operate acceptably at LOS C during the p.m. peak hour (Table 18). Impacts to nearby intersections would be similar to Alternative 1. However, because Alternative 2 assumes more extensive improvements to the intersection of Lyon Street/Richardson Avenue/Gorgas Avenue, only two of the five study intersections (Lombard Street/Lyon Street and Lombard Street/Presidio Boulevard) on the boundary or within the Presidio would fail during the p.m. peak hour (Table 18). Intersection improvements as described in mitigation measures TR-2, *Lombard Street/Lyon Street Intersection Improvements*, and TR-3, *Lombard Street/Presidio Boulevard Intersection Improvements*, and illustrated in Figures 16 and 17 would improve the operating conditions at the intersections to acceptable levels of service. These measures include:

- Signalization and the provision of additional capacity at the intersection of Lombard and Lyon streets, which would improve the p.m. peak-hour operating conditions from LOS F to LOS B.
- Widening and restriping of the northbound approach of the intersection of Lombard Street and Presidio Boulevard, which would improve the p.m. peak-hour operating conditions from LOS E to LOS D.

4.2.7.3 INCREASED PARKING DEMAND

Alternative 2 assumes a parking supply of 1,020 parking spaces. The provision of housing as part of this alternative, which would be available to students and employees of the educational uses, would partially offset the demand generated by the research/educational uses. The parking demand of 1,110 parking spaces for Alternative 2 land uses would exceed the proposed supply of 1,020 spaces, resulting in a shortfall of 90 spaces. To ensure that the shortfall does not result in employees or visitors seeking parking outside of the Letterman Complex, major tenants would need to develop additional TDM strategies to demonstrate that parking demand would be reduced by 90 spaces, or the parking supply would need to be increased to 1,110 parking spaces. Mitigation measure TR-4, *Monitoring of Parking*, and mitigation measure TR-8, *Transportation Demand Management Program*, and measures described below would ensure that planned parking management and the development or expansion of TDM strategies would reduce parking demand both within and outside the 23-acre site. These measures would ensure no significant impacts to parking in Area A and adjacent neighborhoods. Due to the combination of residential and inn/retreat uses, weekend parking demand would be 80 percent of

weekday demand, leaving fewer spaces available for recreational uses on weekends than the other alternatives (Table D-11 in Appendix D).

4.2.7.4 IMPACTS ON PEDESTRIAN AND BICYCLE FACILITIES

Alternative 2 would result in an increase in pedestrian and bicycle activity within and in the vicinity of the Letterman Complex. During the p.m. peak hour, there would be about 230 new pedestrian and bicycle trips. This growth would be accommodated within the existing pedestrian and bicycle network. In addition, planned improvements at the site would enhance the pedestrian and bicycle environment, and facilitate the safe and direct flow of pedestrians and bicyclists to and from the Letterman Complex. Alternative 2 includes the provision of Class II bicycle facilities (separate bicycle lanes adjacent to the vehicular travel lane) within the Letterman Complex.

Implementation of recommended vehicular capacity improvements at the Lombard Street Gate may require adjustment of routes and physical improvements to facilitate access for bicycles currently entering the Presidio via the city's bike route 4 (relocated to Chestnut Street, see mitigation measure TR-6) and bike route 6 (Greenwich Street). The current *Presidio Trails and Bikeways Study* will consider alternatives to the current access on Lombard Street to include widening the current pedestrian walkway at the Lombard Street Gate, re-establishing the historic opening of the Presidio perimeter wall at Greenwich Street (subject to additional environmental review, including Section 106 compliance), relocating bike route 4 to Gorgas Avenue, or creating an expanded bicycle and pedestrian path from the Lombard Street Gate (see Figure 18).

4.2.7.5 INCREASED DEMAND FOR PUBLIC TRANSPORTATION

The 150 p.m. peak-hour transit trips generated by Alternative 2 would be accommodated on the six MUNI bus lines that currently serve the Presidio. The 29-Sunset and the 82X-Levi Plaza Express are expected to carry the greatest number of transit trips. Planned improvements to transit service to the Presidio, including a peak-period express bus service and more frequent service on MUNI's 29-Sunset line, would also serve to accommodate the increase in transit demand.

The average passenger load on Golden Gate Transit transbay buses during the a.m. and p.m. peak hours is about 30 passengers per bus, and there are about 120 buses per hour during the a.m. peak hour and about 110 buses per hour during the p.m. peak hour for about 23 different transbay routes (Golden Gate Bridge, Highway and Transportation District 1997). Alternative 2 would generate 22 transit trips to the North Bay in the p.m. peak hour. If these project-generated passengers were distributed across the 23 Golden Gate Transit routes proportionally to the existing distribution of passengers across routes, Alternative 2 would add a maximum of three passengers to each route. Even if all of the passengers added to a single route were on the same bus, the estimated passenger load would not exceed the bus capacity for any one line.

4.2.7.6 IMPACTS OF TRANSPORTATION DEMAND MANAGEMENT MEASURES

In addition to the TDM plan elements described in Alternative 1, the following TDM measures would be included as part of Alternative 2 and would contribute to encouraging non-automobile modes and reducing parking demand:

- Class II bicycle lanes within the Letterman Complex

- The allocation of a portion of the onsite housing for students of the educational uses within the 23-acre site
- Car-sharing
- Bicycle-sharing
- Onsite amenities and support services
- Pedestrian and bicyclist amenities such as onsite showers and changing rooms
- Parking time limits for short-term parking supply
- Onsite transit passes
- Carpool/vanpool matching
- Promote transportation fairs/events

These measures are geared towards encouraging pedestrian and bicycle travel through the provision of pedestrian and bicycle facilities (bicycle lanes, sidewalks and onsite showers/lockers) and bicycle-sharing. Car-sharing would provide students, employees and residents the flexibility of having an automobile available when a particular trip requires the use of an automobile (for example, a field trip to Muir Woods in Marin). Onsite restaurant and retail establishments to support the residential and employee community would reduce the number of trips that would leave the site. A TDM program, as discussed in mitigation measure TR-8, would be developed that would establish specific performance targets and a monitoring and reporting process.

4.2.7.7 CONSTRUCTION IMPACTS

The impacts associated with additional construction-related traffic on the local and regional traffic network are described under Alternative 1. A construction traffic management plan as discussed in mitigation measure TR-5 would be developed to provide specific routes and other mitigation measures to minimize traffic impacts.

4.2.8 Cultural Resources

4.2.8.1 ADVERSE EFFECT OF REMOVING LAMC/LAIR AND ADDING NEW CONSTRUCTION

Under this alternative, LAMC and LAIR would be removed and replacement construction of 900,000 square feet would be built. In contrast to the current centralized building layout of LAMC and LAIR, replacement buildings would be lower in height, distributed across the 23 acres, and would complement historic patterns of development found elsewhere around the complex. The Planning Guidelines, finalized under this EIS, and Design Guidelines for new construction would be applied to new construction to achieve a contextual and compatible approach to architecture and site planning within the historic setting. However, replacement construction on the 23-acre site would foreclose the opportunity for the construction of new infill buildings within the adjacent historic hospital complex as recommended in the GMPA. Therefore, this alternative would preclude enhancing the campus-like setting of the historic landscape and unifying the disjointed remnant historic building cluster. This would constitute an adverse effect on the adjacent historic hospital complex.

Buildings Massing and Scale – The buildings proposed in this alternative are narrow rectilinear shapes, compatible with existing buildings found throughout the Presidio, and are primarily three- and four-story buildings with punched openings, ground floor entries, and details such as porches and pitched roofs which relate well to the historic setting. Buildings would be restricted to 60-foot and 45-foot heights and their massing would be compatible with the historic setting as described in the Planning Guidelines. By orienting all buildings along the site's southern edge to the north, this alternative would not create any primary building elevations or entries facing Letterman Drive or Lombard Street. Visitors travelling on Lombard Street would see only the backs of several buildings. While the siting of these buildings would not be consistent with the Planning Guidelines, this would not constitute an adverse effect on the historic setting. Attention would be given to refining this edge of the building complex during the design development and review phase to create an attractive public face at this edge of the site, as recommended in the Planning Guidelines.

O'Reilly Greensward – The siting of new buildings close to O'Reilly Avenue would not follow the Planning Guidelines' recommendation for a "greensward" along O'Reilly Avenue. This would be an adverse effect on the O'Reilly streetscape and cluster of former officers' quarters along it. Attention would be given to refining this edge of the site during design review to avoid this adverse effect and make the site design more consistent with the Planning Guidelines' objectives.

Gorgas Avenue – The siting of activities and uses such as a greenhouse, a marketplace for produce and hardscaped outdoor spaces are appropriate to the industrial character and types of activity envisioned for Gorgas Avenue in the Planning Guidelines.

Site Circulation – A network of roads and pedestrian walks would allow circulation through the site in both east/west and, to a lesser extent, north/south directions. Additional circulation connections outlined in the Planning Guidelines would be considered during the design development phase. Connections to existing roads at Torney Avenue and Edie Road, as well as a pedestrian connection at Chestnut Street, would help to tie together the 23-acre site with the rest of the Letterman Complex.

4.2.8.2 BENEFICIAL EFFECT ON EXTANT CULTURAL LANDSCAPE FEATURES

The effect of this alternative on the existing cultural landscape would be beneficial. The historic landscape of the Letterman Complex has been compromised over time by the realignment of Lombard Drive in the 1950s, the construction of the LAMC and LAIR, and the removal of numerous historic structures. Under this alternative, significant historic landscape features within the 23-acre site would be rehabilitated and preserved in the process of making changes to accommodate new uses. Site improvements, listed below, done in conformance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*, with *Guidelines for the Treatment of Cultural Landscapes* (NPS 1996c), would enhance the historic setting and compatible new landscape elements would reinforce the significant characteristics of the Letterman Complex:

- The historic Lyon Street windrow and other remnant historic tree plantings would be maintained and rehabilitated.
- The Presidio boundary wall and Lombard Street Gate would be preserved and rehabilitated.
- Replacement construction would be sited to reinforce the historic patterns of development.
- Excess pavement throughout the 23-acre site would be removed.

4.2.8.3 ADVERSE EFFECT DUE TO REMOVAL OF TENNIS COURTS (STRUCTURES 1147 AND 1052)

Under Alternative 2, both of the historic tennis courts on the northern edge of the 23-acre site would be removed and relocated elsewhere within the Letterman Complex. Although both courts retain their original location, orientation, foundation and shape, the overall setting as well as nets, fences and surfaces have been substantially altered in recent years, thus compromising their historic integrity. Removal and replacement of both of these structures would have an adverse effect on the structures but would not compromise the National Historic Landmark district.

4.2.8.4 EFFECT ON THE PRESIDIO WALL

Alternative 2 proposes re-introduction of a pedestrian entrance through the Presidio wall along Lyon Street at the Chestnut Street intersection. Physical evidence indicates the existence of a pedestrian entrance historically in this location, which has been closed with coursed stone to match the adjacent wall. The exact date of construction of the Presidio wall in the vicinity of the Letterman Complex is estimated to be that of the Lombard Street Gate construction (c. 1896). Though the exact construction date of the pedestrian entrance through the wall is not known, it is known that it existed during the historic period of significance. Re-introduction of the entrance would be in keeping with the *Secretary of Interior's Standards for Rehabilitation* and would not constitute an adverse effect on the Presidio wall or National Historic Landmark district.

4.2.8.5 EFFECTS DUE TO INTERSECTION AND ROADWAY IMPROVEMENTS

Under this alternative, several changes would be made to the east end of the Gorgas Avenue corridor to address traffic and safety concerns. These actions include the reconfiguration of the Gorgas Avenue Gate/Lyon Street entrance and a connector from Gorgas Avenue to Richardson Drive.

Reconfiguration of the Gorgas Avenue Gate/Lyon Street entrance to address traffic safety concerns would include a reduction of non-historic pavement to the maximum extent possible, restoration of the immediate historic landscape, and a more defined sense of entry into the Presidio, as historically existed.

A new, 28-foot-wide road lane would be constructed between buildings 1160 and 1152 to facilitate movement of traffic from the Letterman Complex to Richardson Avenue. The siting of a new connector for exiting traffic from Gorgas Avenue to Richardson Avenue would result in an increase of vehicular traffic on the eastern edge of Gorgas Avenue. However, this new connector would not require the removal of Building 1160, a contributing building to the National Historic Landmark district. Building 1152, constructed in 1945 as a two-story wood, concrete and steel-frame gymnasium with red composition roof, is currently in use as a gym and would be retained. The alteration of setting at the east end of Gorgas Avenue, through increased vehicular traffic and the potential segregation of buildings 1151 and 1152 from pedestrian traffic in this area, would not constitute an adverse effect on these properties. The balance of the streetscape's industrial character would be preserved and design refinements of these intersection improvements would strive to maintain the overall streetscape and its character-defining features. Safe, pedestrian access to buildings 1151 and 1152 would also be provided through the design process.

The minor roadbed improvements at the Lombard Street/Presidio Boulevard intersection alter the immediate landscape by widening the northbound lane of Presidio Boulevard to provide one right-turn lane in addition to the through lane. Construction would be kept to a minimum to preserve and protect as much of the remnant historic landscape features as possible to retain the historic character of the road corridor.

The removal of the non-historic Letterman Drive would have no effect on the historic setting. However, the extension of Torney Avenue to connect with Lombard Street would provide a direct entry into the 23-acre site. This new entry would be inconsistent with historic circulation patterns and the historic streetscape associated with Lombard Gate. Further study would be conducted during the design review, and modifications would be made, as needed, to avoid an adverse effect on the historic setting.

Improvements to the Lombard Street Gate entrance, which would include signalization and re-striping to accommodate one turning lane and one through lane within the Presidio, would have no adverse effect on elements of the historic gate entrance. In conjunction with the intersection improvements, the historic gate and wall would be preserved through conservation work. Overall, these intersection improvements would comply with the *Secretary's Standards for the Treatment of Historic Properties*.

4.2.8.6 VISUAL IMPACTS

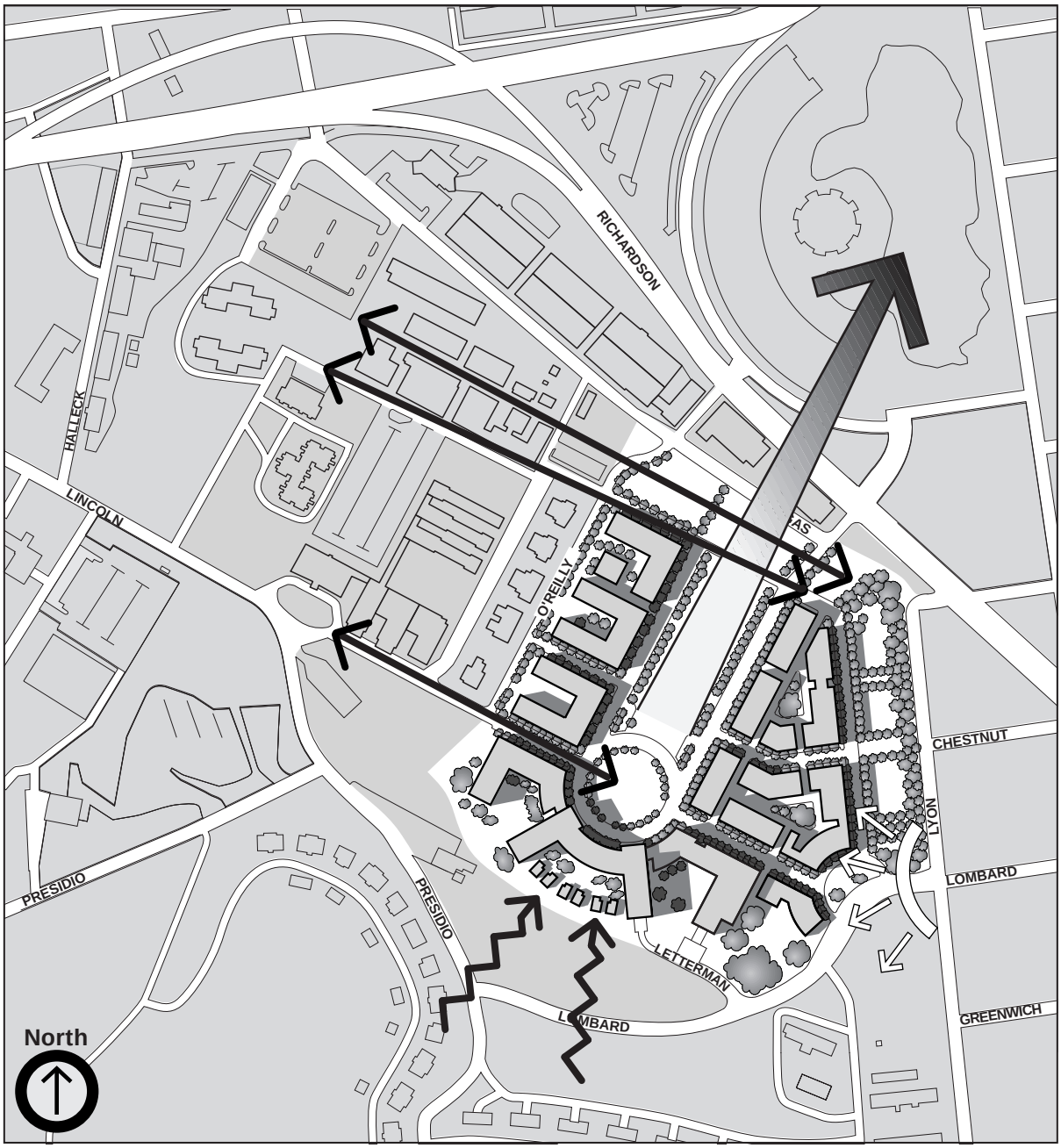
This alternative, with the removal of LAMC and LAIR, the large paved parking area that occupies the eastern half of the 23-acre site, and the introduction of lower scaled, new construction, would enhance the visual integrity of the Letterman Complex. The removal of the 10-story LAMC building, and replacement with new construction limited to 60 feet in height, would substantially improve the views from many vantage points within the Presidio. The central landscaped open space would provide views of the Palace of Fine Arts, which would enhance the scenic qualities of the 23-acre site (refer to Figure 21). This alternative would preserve the historic view corridors at Thornburg and Edie Roads and would open up the historic view corridor at Torney Avenue that is currently blocked. Views into the 23-acre site from Lyon Street would be screened by the existing windrow.

This alternative does not provide north-facing views into the center of the site or to the Palace of Fine Arts beyond Letterman Drive (which would be eliminated under this alternative) or from Lombard Street. Modifications to this edge would be considered during design review to enhance these views.

The siting of buildings near Lombard Street Gate would alter the visual setting at this important entry point. New construction would conform to the historic pattern of development for the Letterman Complex, which included buildings very close to the Lombard Street Gate. However, because of their proximity to Lombard Street, the buildings would dominate entry views into the Presidio at this point of arrival. Implementation of mitigation measure VR-1, *Planning and Design Guidelines* would address modifications to this edge during design review to minimize impacts on entry views from the gate.

4.2.8.7 BENEFICIAL EFFECT ON VISITOR EXPERIENCE

This alternative would have a beneficial effect on the visitor experience. A central commons would be developed as a public open space. Replacement construction would afford an opportunity for public gathering



Key Scenic Views and View Corridors

Historic View Corridors

Obstructed Views

Views from Entry Point

**Figure 21.
Visual Impacts of
Alternative 2**

places and locations for programs open to the public. An active market place and demonstration gardens and greenhouses would be open for visitors to learn about urban agriculture and sustainable practices. Other amenities would include a mix of health and education programs, two restaurants and an inn/retreat, which would all contribute to a lively, sustainable urban village atmosphere open to the public.

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

4.2.8.8 EFFECT ON ARCHEOLOGICAL PROPERTIES

The initial Archeological Management Assessment conducted for the 60-acre Letterman Complex indicates that ground-disturbing activities associated with the alternative would have the likelihood of encountering archeological resources. Appendix F contains a program describing future AMAs and Monitoring Programs to be employed for all undertakings at the Letterman Complex. The AMAs and Monitoring Programs would ensure that all planned undertakings would be reviewed by a qualified archeologist prior to their implementation. Construction projects and ground-disturbing activities would be closely observed in the vicinity of sensitive archeological areas to discover, document, protect, and manage the archeological record of the Presidio. An inventory study of known archeological sites in the area of each undertaking, including test excavations, as appropriate, would be conducted to determine whether significant sites or historic features are extant and if construction might adversely affect archeological resources. Reports of any investigations would be submitted to the SHPO and the ACHP. A phased inventory, evaluation, monitoring, and treatment program for archeological resources regarding ongoing maintenance and construction in the complex would be conducted. The discovery of any human remains or associated mortuary items covered under the Native American Graves Protection and Repatriation Act would be treated in accordance with 43 CFR 10.4 (Inadvertent discoveries). The consultation and work would be conducted in accordance with the Programmatic Agreement (Appendix F to this document). As a result of these practices, an adverse effect on archeological properties would be avoided.

4.2.9 Air Quality

4.2.9.1 SHORT-TERM DEMOLITION/CONSTRUCTION IMPACTS

The impacts during demolition of buildings and replacement construction at the Letterman Complex would be similar to those shown under Alternative 1, although they may be slightly longer in duration (i.e., one to three months) due to demolition of the LAIR. Compliance with the applicable requirements for asbestos control and incorporation of mitigation measures AQ-1, *BAAQMD Control Measures*, and AQ-2, *Demolition of Existing Buildings* into the alternative would reduce the effects of demolition and construction activities to a less-than-significant level.

4.2.9.2 LONG-TERM REGIONAL OPERATION IMPACTS

Alternative 2 would result in an increase of up to approximately 4,910 internal and external vehicle trips per day. Based on URBEMIS7G modeling results, increased vehicle trips associated with the alternative would generate approximately 49 lb/day of ROG, 74 lb/day of NO_x, 32 lb/day of PM_{10} and 557 lb/day of CO. These emission rates are summarized in Table 22. Alternative 2 would not result in regional operational emissions exceeding any of the BAAQMD's significance thresholds for ROG, NO_x or PM_{10}.

Similar to the impacts under Alternative 1, direct and indirect emissions from the use of electricity and natural gas due to Alternative 2 would not be significant when compared to the emissions caused by project-related traffic, and the alternative would not have the potential to expose nearby receptors to toxic air contaminants.

4.2.9.3 LONG-TERM LOCAL OPERATIONS IMPACTS

Localized CO impacts due to project traffic are described under Alternative 1. Because 2010 traffic under Alternative 2 would result in fewer than 1,680 vehicles in the p.m. peak hour through the Lombard Street Gate, the localized CO concentrations for Alternative 2 would be less than 7.9 ppm on a 1-hour basis and less than 5.4 ppm on an 8-hour basis. These localized CO concentrations would not exceed the state ambient air quality standards for CO.

4.2.10 Noise

4.2.10.1 SHORT-TERM DEMOLITION/CONSTRUCTION NOISE IMPACTS

As described in Alternative 1 and in the GMPA EIS, construction noise would create an intermittent impact on the noise environment. The analysis of construction noise in the GMPA EIS was based on the demolition and removal of about 275 buildings, not including the LAIR (NPS 1994a). The GMPA EIS determined that buildings to be removed would need to be at least 250 feet from nearby residences and facilities in order for noise impacts to property owners to be less than 80 dBA L_{eq}. Because demolition of the LAIR building would take place about 350 feet from the nearest residential neighborhoods, demolition activities would not exceed the noise thresholds in the San Francisco Noise Ordinance.

Recreational users and other people outside the Letterman Complex would experience the construction noise throughout its duration, but because of the size and location of the Letterman Complex, most would be protected from construction noise by distance. However, short-term use of impact tools would be disruptive to recreational users within several hundred feet of construction sites. Thus, replacement construction under this alternative would have an unmitigable, potentially significant short-term impact on occupants and recreational users internal to the Letterman Complex.

4.2.10.2 LONG-TERM TRAFFIC NOISE INCREASES

The impacts of traffic noise caused by Alternative 2 would be similar to those described under Alternative 1. Traffic volumes for Alternative 2, including peak traffic volumes for Gorgas Avenue, would be within 5 percent of those shown for Alternative 1, and the associated noise level increases would be nearly equivalent. New housing uses within the Letterman Complex proposed with Alternative 2 would be sensitive receptors, but

would be designed with sufficient noise insulation for compliance with Title 24. As such, the traffic noise increases associated with Alternative 2 would not cause a significant impact.

4.2.10.3 LONG-TERM STATIONARY SOURCE NOISE IMPACTS

The impacts of stationary sources of noise associated with Alternative 2 would be similar to those shown under Alternative 1. No significant long-term stationary source noise impacts are expected.

4.2.11 Cumulative Impacts

4.2.11.1 SOLID WASTE

Demolition, construction and renovation activities at the Letterman Complex would include the disposal of approximately 80,000 tons of debris that would contribute to a cumulative reduction in regional solid waste capacity. These activities, along with the other listed projects in Table 9 would result in the disposal of a total of approximately 107,745 tons of debris.[1] This tonnage would result primarily from the demolition of the 451,000-square-foot LAMC and the 356,000-square-foot LAIR facilities at the Letterman Complex, and the 122,000-square-foot addition to building 1801 at the Public Health Service Hospital Complex. The 107,745 tons of debris generated from the Letterman Complex and the other projects represents approximately 1.6 percent of the 6.6 million tons total volume of waste disposed of in the nine-county Bay Area in 1997. Wood and masonry (composed primarily of brick and concrete) would be the largest portion of the waste stream, followed by gypsum, paper, glass, plastics, asphalt, various roofing materials, and mixed waste. Wastes would also include major appliances, heating and air conditioning equipment and ducting, furniture, carpet and flooring, wiring, plumbing, and other fixtures (though many of these items would be sold or salvaged prior to demolition). The California Integrated Waste Management Act of 1989 requires cities and counties to divert 50 percent of their waste streams from landfills. The Presidio Trust would implement cost-effective, environmentally protective alternatives to disposal of demolition debris (as listed under Alternative 1) to help meet the mandates of the state's 1989 waste diversion law. Implement of these strategies to dispose of demolition debris would reduce the impacts on regional landfills to a less-than-significant level.

4.2.11.2 WATER SUPPLY

The Lobos Creek watershed would be insufficient to supply the in-stream flow requirement necessary to maintain natural streambed characteristics and meet peak Presidio daily demands of 1.71 mgd with this alternative and the other projects listed in Table 9 that are within the Presidio (BAE 1998a). Alternative 2 and the other identified projects within the Presidio would contribute to a net cumulative peak shortfall of approximately 312,000 gpd on the Presidio-wide water supply due to excess demand (BAE 2000). However, water supply- and demand-side measures and instream flow monitoring described in mitigation measures WS-2, *Water Supply- and Demand-Side Solutions to Reduce Cumulative Impacts*, WS-3, *Instream Flow Monitoring to Reduce Cumulative Impacts*, and WT-1, *Water Reclamation Plant to Reduce Cumulative Impacts*, would result

[1] The Crissy Field project included removal of 86,000 tons of soil containing hazardous substances which were taken to federally approved dump sites. The contribution to the regional solid waste stream associated with this soil removal was not considered in the cumulative impacts on the solid waste stream as the disposal has already occurred and related to hazardous waste, rather than the general waste streams analyzed in this assessment.

in a water savings of approximately 320,000 gpd, which would minimize cumulative impacts on the system and baseline stream flow maintained in Lobos Creek.

Projects within the surrounding area would increase water consumption, but according to the city, not in excess of amounts expected and provided for in this area. In general, the projects represent replacement or renovation of existing facilities previously served by the city. New construction would be subject to current city of San Francisco water conservation code requirements. Should the Presidio Trust enter into a water purchase agreement with the city to ensure adequate water supplies during peak demand periods, there would be no significant impact on regional water demand since the pending purchase agreement would essentially replace previous agreements held by both the U.S. Army and NPS with the city.

4.2.11.3 SCHOOLS

New housing units associated with this alternative are expected to contribute to a cumulative reduction of excess capacity in schools neighboring the Presidio. However, this impact is considered less than significant because SFUSD would be reimbursed through Impact Aid Program payments for pupils living at the Presidio. The increased intensity of residential use of the 1880 Lombard Street residential building would not be of a magnitude that would result in a significant increase in school enrollment.

4.2.11.4 HOUSING

This alternative and the projects listed in Table 9 would add 3,261 employees to the local economy. The new development within the Letterman Complex accounts for 2,000 jobs, or 61 percent of this total. This growth in employment is estimated to require 628 new housing units (BAE 2000). The alternative proposes to add 400 housing units at the Letterman Complex. The listed projects include provision of 1,331 new housing units (1,304 renovated units on the Presidio and 27 new units in the Marina District.) The housing demand resulting from the projects would be more than offset by the housing units added to the local supply, largely by reactivation of housing at the Presidio. Therefore, cumulative demand under this alternative would not contribute to employment-related housing demand increases in the surrounding neighborhood or city.

4.2.11.5 TRAFFIC AND TRANSPORTATION SYSTEMS

The traffic generated by land uses under Alternative 2 would contribute to the expected increases in cumulative traffic volumes on adjacent local and regional roadways. Cumulative increases would be due to the reasonably foreseeable projects within the Presidio, including the Letterman Complex, and in the surrounding neighborhoods as shown in Table 19. Alternative 2 would make up 29 percent of the total p.m. peak-hour traffic resulting from these cumulative projects (Table 19). This proportion varies throughout the project impact zone depending on location. For example, Alternative 2 would contribute 21 percent to the growth in traffic between existing and cumulative conditions at the intersection of Lyon and Lombard streets, and 88 percent of cumulative growth in traffic at the reconfigured intersections at the Gorgas Avenue Gate, which would serve as the primary vehicular entrance to the 23-acre site. The combined cumulative projects, including Alternative 2, would generate increased traffic volumes throughout the Presidio. The cumulative projects would create 340 additional vehicles on Lincoln Boulevard during the p.m. peak hour, and Alternative 2 would make up about 16 percent of the additional traffic. The cumulative increase in traffic would cause significant impacts at the intersections of Lombard Street/Lyon Street and Lombard Street/Presidio Boulevard. However, mitigation

measures TR-2 and TR-3 would improve operating conditions at these intersections to acceptable levels (LOS D or better), as shown in Table 20.

The parking demand generated by the cumulative projects, including Alternative 2, is estimated to be 4,222 spaces. All of the additional parking demand related to cumulative projects within the Presidio would occur outside Area A, except the additional demand generated by actions at Crissy Field. The East Beach at Crissy Field would create a demand for 100 additional parking spaces (Table 21). The increased parking demand would be accommodated by the 560-space proposed supply. The land uses of Alternative 2 would comprise 31 percent of the total cumulative parking demand within the Presidio and 26 percent of the total cumulative parking demand in the project impact zone (Table 21). The other primary parking demand generating uses would include housing throughout the Presidio and office space at the Main Post. The planned parking supply of 8,390 spaces throughout the Presidio (as described in the 1994 GMPA) would be adequate for the expected cumulative demand within the Presidio.

Parking supply in the 23-acre site in Alternative 2 would not be adequate to support the predicted demand of 1,110 spaces, as discussed in Section 4.2.7.3. Mitigation measure TR-4, *Monitoring of Parking*, would ensure that the shortfall does not result in employees or visitors of the 23-acre site seeking parking outside the Letterman Complex. In the Main Post, cumulative land uses would generate 1,030 parking spaces which, when added to the current demand, yields a demand for 1,550 parking spaces, or 230 spaces less than the 1,780-space supply described for Year 2010 in the GMPA.

The city has indicated that the impact of the two Lombard Street projects on parking availability would not be substantial, although neighbors have reported that very few parking spaces are available at evening hours. The projects are expected to fall just short of estimated parking demand by about four to six spaces. This unmet parking demand would mean drivers would need to compete for on-street parking in the vicinity or outside of the immediate area (including the Presidio), which, though inconvenient, would not substantially alter the existing nature of area-wide parking conditions.

The increase in attendance due to the renovation of the Exploratorium would increase the parking demand to a maximum on weekends of 520 spaces. The Exploratorium has requested use of parking (about 210 spaces) in the Presidio for peak periods, utilizing shuttle buses if appropriate. The Exploratorium parking may need to be expanded to reduce the demand deficit as the Exploratorium increased activities. Event coordination between staff of the Trust and the Exploratorium would be required to reduce concurrent demand for available parking spaces.

The alternative's contribution to cumulative growth would have a minor cumulative effect on local and regional traffic growth and related congestion, and would be similar to Alternative 1.

4.2.11.6 CULTURAL RESOURCES

Under this alternative, LAMC and LAIR would be removed and replacement construction of 900,000 square feet would be built. In contrast to the current centralized building layout of LAMC and LAIR, replacement buildings would be lower in height, distributed across the 23 acres, and would complement historic patterns of development found elsewhere around the complex. The Planning Guidelines, finalized under this EIS, and

Design Guidelines for new construction would be applied to new construction to achieve a contextual and compatible approach to architecture and site planning within the historic setting. However, replacement construction on the 23-acre site would not allow for the construction of new infill buildings within the adjacent historic hospital complex as recommended in the GMPA. Therefore, this alternative would not contribute to cumulative beneficial effects on the National Historic Landmark district.

4.2.11.7 AIR QUALITY

Proposed development under Alternative 2 and the projects identified in Table 9 would contribute to a cumulative increase in vehicle trips on the region's roadways and would contribute to cumulative increases in regional emissions. The cumulative operational emissions would cause localized impacts at congested intersections in the vicinity of the projects, but the resulting impacts would not be expected to cause local violations of ambient air quality standards. Anticipated cumulative increases in vehicle trips would also result in increases to region-wide emissions of ozone precursors (including NO_x and ROGs) and CO. The proposed development would cause emissions of ozone precursors that fall below the thresholds set forth in federal regulations for conformity determinations (as shown in Table 22). Because emissions of ozone precursors would be less than the applicability thresholds, a conformity determination is not necessary for ozone. Emissions of CO that would be caused by the cumulative scenario under Alternative 2 are accounted for in the current maintenance plan for CO, as discussed in Section 5.4.2. Because the projects are in conformance with regional air quality plans, no further conformity analysis is necessary, and no significant cumulative impacts would occur.

4.2.11.8 NOISE

Demolition and construction activities under Alternative 2, in combination with the project to reconstruct Doyle Drive, would cause short-term cumulative noise impacts if the two projects were to be under construction at the same time. Long-term cumulative impacts around the Letterman Complex would primarily result from increased traffic on Doyle Drive (U.S. Highway 101). The long-term cumulative effect of Alternative 2 and other projects within the Presidio and nearby portions of San Francisco would be increased traffic noise on most of the roads internal and external to the Presidio.

Because the surroundings are dominated by traffic noise in the existing conditions, approximately two-fold increases in traffic would have to result from cumulative development in order to cause increases in traffic noise that would be noticeable to most people. Cumulative development with Alternative 2 would cause peak-hour traffic increases along Lombard Street, inside the Presidio, that could result in noticeable noise increases, but no noise sensitive receptors are located along this segment. None of the roadway segments near noise sensitive receptors would experience greater than two-fold peak-hour traffic increases. The conclusion in the GMPA Final EIS that long-term cumulative traffic-induced noise levels would increase due to increases in vehicle volumes remains applicable; however, the increases near sensitive receptors would not be considered significant. No significant cumulative noise impacts are expected.

4.2.12 Unavoidable Adverse Effects

The following impacts are identified as potentially significant and for which there are no mitigating measures or that would not be mitigated to a level of insignificance.

Cultural Resources – To the extent new construction would not conform to the Planning Guideline recommendations, the following departures would have a potential adverse effect on the historic and visual setting:

- Removal of LAMC and LAIR and replacement construction consistent with Planning and Design Guidelines would not allow for infill construction as recommended in the GMPA which would have an adverse effect on the adjacent historic hospital complex.
- Siting of buildings along O'Reilly Avenue would have an adverse effect on the adjacent historic structures.
- The direct entry into the 23-acre site from Lombard Street would not reflect historic circulation patterns and would have an adverse effect on the historic streetscape associated with Lombard Street Gate.
- Buildings located close to Lombard Street Gate would dominate entry views into the Presidio at this important point.

Noise – Short-term use of impact tools and demolition activities would be a source of increased noise to occupants and recreational users within the Letterman Complex. Mitigation measures proposed to reduce intrusions would reduce noise impacts but not to a level of insignificance to those users closest to (i.e., within 250 feet from) construction equipment.

4.2.13 Relationship of Short-Term Uses of the Environment and Maintenance and Enhancement of Long-Term Productivity

Use of the site for offices, education, housing, an inn/retreat, retail and other development would preclude other long-term management possibilities for the 23 acres. These uses would occur within an intensively used area the northern part of the Presidio which would allow areas in the south and along the coast to remain more natural and experience less activity and development. Reinforcement of this overall use pattern would minimize impacts on the productivity of park resources.

Use of the site for mixed uses would not affect any park ecosystem. Improvements to existing infrastructure would be considered sustainable actions that are expected to improve the operation of systems. Through implementation of the Planning Guidelines for the project, the Presidio Trust would promote environmental protection and sustainable design and encourage technologies and practices that would reduce environmental impacts or produce environmental benefits in water conservation and reclamation, energy conservation and transportation.

4.2.14 Irreversible or Irretrievable Commitments of Resources

New development would be designed and constructed to minimize consumption of energy and development of non-renewable fuels. Renewable sources of energy and new developments in energy-efficient technology, including recycling of materials and waste, would be fully explored and implemented to the extent possible. Although the site could be restored to previous conditions over time, the use of land, construction materials, energy, and financial resources to implement the alternative would, in a practical sense, be an irretrievable commitment of resources.

Archeological resources would be avoided where possible and historic resources would be protected. Where this is not possible, disturbance would be mitigated through recovery of cultural information and significant artifacts.

4.3.1 Consistency with Approved Plans and Policies

4.3.1.1 GENERAL OBJECTIVES OF THE GMPA AND PURPOSES OF GGNRA ACT

This alternative is consistent with the General Objectives of the GMPA, which are identified in Section 1.1.5 of this document. Foremost, it is consistent with the General Objective of sustaining the Presidio indefinitely, both economically and physically, through the development team's organizational and financial capabilities to undertake capital investments, operate programs, and make contributions to help preserve the park's unique historic and natural qualities. This alternative is consistent with meeting the Trust Act's financial self-sufficiency mandate and the requirement that the Trust give priority to tenants that enhance the financial viability of the Presidio.

Removal of both the LAMC and LAIR buildings, modern structures that block view corridors and are architecturally non-distinctive, would be consistent with the General Objective of the GMPA to enhance the scenic resources of the Presidio. LAMC and LAIR removal is also consistent with the General Objective of enhancing the Presidio's cultural resources by assisting in rehabilitating historic settings to permit an understanding of the site's significance to the National Historic Landmark district. In furtherance of this General Objective, design and siting of new construction would promote the enhancement and rehabilitation of scenic vistas, including views to the Palace of Fine Arts. New construction to replace the monolithic and architecturally non-distinctive buildings with those better tailored to the mass, scale, color, and materials of other structures in the Letterman Complex and the Presidio would be in keeping with preservation of the character and integrity of the National Historic Landmark district. Consistent with the General Objective to provide for uses that involve stewardship and sustainability, replacement construction would promote principles of sustainable design and technology. Furthering this General Objective, hand-dismantling and salvaging of materials prior to building demolition and conservation and recycling strategies to be employed within the buildings and by tenants would promote and demonstrate conservation practices, including waste reduction and recycling.

Alternative 3's education component, including the culinary institute and conference center, would be consistent with the General Objective of the GMPA to provide for appropriate uses of the Presidio, particularly those that involve education, research, innovation and communication.

Alternative 3 is also consistent with the GMPA's General Objective of addressing the needs of Presidio visitors, tenants, and residents. The hotel would address the needs of park visitors. Further, the housing accommodations for the assisted living and nursing facilities would address the needs of tenants and residents at the site. Tenant programs to reduce automobile use and parking demand would also be consistent with this General Objective.

Alternative 3 is consistent with the purposes of the GGNRA Act, which are identified in Section 1.1.5 of this document. Primarily by focusing more intensive use into an area that has been previously developed, Alternative 3 preserves the recreation area as far as possible in its natural setting. New construction would be

subject to sound land use planning, including implementation of the Planning Guidelines and design review, so that it would not degrade scenic views and the natural setting.

4.3.1.2 PRESIDIO GENERAL MANAGEMENT PLAN AMENDMENT

This alternative is also consistent with a number of the more specific goals and planning principles of the GMPA. This alternative would foster the GMPA's proposed major directions for the future of the Presidio by perpetuating the site as a building and activity core. New construction would replace the LAMC as permitted under the GMPA since the LAMC would not meet essential program and management needs.

In certain respects, Alternative 3 does not match the GMPA's site-specific plan. This alternative would not promote the GMPA concept for infill construction within the complex but would focus replacement construction within a 23-acre site. Because replacement construction would occur within only a portion of the potential sites that were identified on a preliminary basis as referenced in the GMPA (i.e., outside the historic hospital complex), the alternative would not reinforce the historic hospital complex's courtyard as encouraged by the GMPA. Whereas the GMPA assumed rehabilitation and reuse of LAIR, demolition of the LAIR and other existing buildings that have been demolished or are designated for demolition so as to allow new replacement construction would also increase the total amount of gross square footage of replacement construction within the complex as envisioned in the GMPA from 503,000 to approximately 900,000 square feet. Nevertheless, the GMPA's key restrictions on maximum allowable square footage for the complex (1.3 million square feet) and maximum allowable height of new construction (60 feet) would not be exceeded by this alternative. Furthermore, replacement construction would proceed in accordance with the Planning Guidelines, as included within this document, and design review as recommended within the GMPA to ensure that new construction would be compatible with the adjacent historic buildings and patterns of development.

Alternative 3's education component, including the culinary institute and conference center, would, consistent with the specific program goals of the GMPA, assist in making the Presidio a center for research and learning. Programs conducted at the senior living center would advance intergenerational and collaborative approaches to problem solving and provide opportunities for skills development and lifelong learning. Alternative 3 is also consistent with the GMPA's specific goal of providing accommodations for visitors to create a lively community that contributes to the site. Housing accommodations for the assisted living and nursing facilities would support the GMPA's specific long-term goal of clustering housing opportunities near and within the park's work and major activity centers. Provision of limited retail facilities and services within walking distance of housing, including the restaurants and fitness center, would reinforce the GMPA's neighborhood concept. Further, tenant programs to reduce automobile use and parking demand would further the GMPA's specific goals of reducing automobile use and making the Presidio an environmental model.

Alternative 3 would not, however, implement the specific proposal in the GMPA for the Letterman Complex to serve as a science and education center devoted to issues of health, life and earth sciences. Since to date no suitable tenant has been identified for the site that would adhere to the GMPA's specific proposal, this potential land use conflict cannot be resolved. However, mitigation measures identified in Section 4.7 would be implemented to lessen adverse environmental impacts of this alternative.

4.3.1.3 SAN FRANCISCO GENERAL PLAN

While the Presidio is not subject to the General Plan, this alternative would support the General Plan objective to enhance San Francisco's position as a national center for conventions and visitor trade. This alternative would also be consistent with the General Plan guideline to locate overnight accommodations in districts with an overconcentration of hotels at least 300 feet from any existing hotel, motel or bed and breakfast establishment. However, it may not be consistent with the policy to restrict business activities of city-wide importance to districts devoted to and designated for business services.

4.3.2 Solid Waste

4.3.2.1 DISPOSAL OF DEMOLITION DEBRIS OFFSITE

The impacts of this alternative on solid waste sites located in the Bay Area are similar to those discussed for Alternative 2. Due to the demolition of both the LAMC and LAIR buildings as proposed under this alternative, Alternative 3 would generate 80,000 tons of construction debris. This represents 44,600 (55 percent) more tons of debris than Alternative 1. Appropriate landfill sites are available in the Bay Area, landfill operators have sufficient capacity and are willing to accept the material, and at least 50 percent of the debris would be diverted from the landfills. Thus, Alternative 3 is expected to have a less-than-significant impact on regional solid waste disposal facilities.

4.3.3 Water Supply and Distribution

4.3.3.1 IMPACTS OF WATER CONSUMPTION ON BASELINE

Alternative 3 would demand approximately 68,000 gpd of water (Tables 12 and 13). This estimate assumes use of 12,250 gpd of gray water or water captured onsite for landscape irrigation and the proposed "water feature." Since the estimated water consumption of this alternative is well below the 89,000 gpd threshold established for the site, Alternative 3 is not expected to have a negative effect on the Presidio water supply. Nevertheless, the development team should adopt water conservation measures implemented by the Presidio Trust and described in mitigation measure WS-2, *Water Supply- and Demand-Side Solutions to Reduce Cumulative Impacts* to further reduce water consumption.

4.3.3.2 IMPACTS ON FIRE FLOWS

Improvements to the water distribution system may be required to ensure adequate fire flow to new development in the Letterman Complex to meet the Uniform Fire Code, depending on the characteristics of buildings to be constructed (see mitigation measure WS-1, *Fire Flows*).

4.3.4 Schools

4.3.4.1 IMPACT ON CAPACITY AT EXISTING OR NEW SCHOOL SITES

The impacts of this alternative on SFUSD schools would be the same as for Alternative 1 (Table 14). At full occupancy, Alternative 3 would generate 92 schoolchildren between the ages of 5 and 18 who would enroll in

SFUSD schools. Because this level of enrollment is within the existing capacity of SFUSD, Alternative 3 would not result in an adverse impact on SFUSD schools.

4.3.5 Housing

4.3.5.1 INCREASE IN HOUSING DEMAND

At buildout, the additional regional housing demand created by employment associated with Alternative 3 would be 385 housing units (Table 15). The Presidio housing stock would accommodate about 69 percent of this housing demand. Thus, the new demand on regional housing due to implementation of the alternative would be 120 units. This represents less than 0.5 percent of the estimated new housing construction between 2000 and 2010 (Association of Bay Area Governments 1998), and less than 1 percent of the currently vacant units in the Bay Area (California Department of Finance 1998). Distributed by sub-region in the Bay Area, this new demand would be 66 units in San Francisco, 24 units in the East Bay, 20 units in the North Bay; and 10 units on the Peninsula. The potential new housing demand created by employment associated with this alternative would not have a significant effect on the regional housing market since it represents an insignificant percentage (less than 1 percent) of the total number of vacant housing units.

This alternative would incrementally contribute to the Presidio housing demand, which represents a small portion of the employment-related housing demand increases in San Francisco and the Bay Area. However, given the short supply of affordable housing in the city, there would be an adverse impact from any unmet affordable housing demand. To limit the demand for affordable units in San Francisco, the Presidio Trust offers reduced rental rates to Presidio employee and tenant households with gross household incomes of less than $45,000. As Presidio buildings are reoccupied and park programs and activities are established, the need for additional onsite housing, including affordable housing, would be analyzed based on actual employment patterns and related housing demands associated with building uses.

4.3.6 Medical Research

4.3.6.1 IMPACT ON MEDICAL RESEARCH

As described in Section 3.8, there is no evidence of significant demand for medical research facilities at the Letterman Complex despite good faith efforts to solicit proposals for such use. Therefore, no adverse impact on medical research facilities is anticipated.

4.3.7 Traffic and Transportation Systems

Under Alternative 3, the existing roadway network within the 23-acre site would be maintained. Improvements to the intersection(s) of Lyon Street/Richardson Avenue/Gorgas Avenue would allow for left turns into the Letterman Complex from westbound Richardson Avenue. The Gorgas Avenue Gate would be the primary entrance, with the Lombard Street Gate serving as a secondary entrance. Alternative 3 would also include

improvements to the pedestrian and bicycle circulation network within the complex, as well as improved connections to adjacent areas. Alternative 3 assumes a total of 1,690 parking spaces within the site.

4.3.7.1 ADDITIONAL TRAFFIC VOLUMES

Alternative 3 would generate 4,460 external (i.e., to areas outside the Presidio) weekday daily vehicle-trips, and 430 vehicle-trips during the p.m. peak hour into and out of the Presidio (Table 16). Of the 430 p.m. peak-hour vehicle-trips generated by Alternative 3, 120 would be inbound and 310 would be leaving the site (Table D-19 in Appendix D). The trip generation levels used assume that the inn/retreat would function largely as a longer-stay conference facility.

Between existing and 2010 conditions, the Mason Street Gate would experience an increase of 350 vehicles during the p.m. peak hour, with project-related traffic comprising 11 percent of this increase. Alternative 3 would contribute the majority of the traffic volume increase at the Gorgas Avenue Gate. Traffic volumes at this gate would increase by 490 vehicles during the p.m. peak hour, with the project-generated traffic comprising 57 percent of this growth. The existing p.m. peak-hour traffic volumes at the Lombard Street Gate would be increased by 400 vehicles, and 10 percent of this increase would be due to new development within the 23-acre site. The existing p.m. peak-hour traffic volumes at the Presidio Boulevard Gate would increase by 210 vehicles, with the project-related traffic comprising 33 percent of this increase (Table 17).

4.3.7.2 IMPACTS ON INTERSECTION OPERATING CONDITIONS

Currently, during the p.m. peak hour, two of the study intersections operate at LOS C, four intersections operate at LOS B and one intersection operates at LOS A (Table 4). Under Alternative 3, three of the study intersections (Presidio Boulevard/Letterman Drive/Lincoln Boulevard, Mason Street/Marina Boulevard/Lyon Street, and Doyle Drive/Marina Boulevard/Lyon Street) would operate acceptably at LOS C during the p.m. peak hour (Table 18). Impacts to nearby intersections would be similar to Alternative 2 (Table 18). The intersections of Lombard Street/Lyon Street and Presidio Boulevard/Lombard Street would fail, operating at LOS F and LOS E, respectively. Recommended improvements as described in Mitigation Measures TR-2, *Lombard Street/Lyon Street Intersection Improvements*, and TR-3, *Lombard Street/Presidio Boulevard Intersection Improvements*, in Section 4.6.6 and illustrated in Figures 16 and 17 would improve the operating conditions at the intersection of Lombard Street/Lyon Street from LOS F to LOS B and at the intersection of Presidio Boulevard/Lombard Street from LOS E to LOS D.

4.3.7.3 INCREASED PARKING DEMAND

Alternative 3 assumes a parking supply of 1,690 parking spaces. Alternative 3 parking demand is estimated to be 1,280 spaces, with the office uses accounting for the majority of the total parking demand (65 percent) at the 23-acre site. The parking demand of 1,280 parking spaces for Alternative 3 land uses would be substantially less than the proposed supply of 1,690 spaces. Therefore, there would be no significant impact on parking in Area A or adjacent neighborhoods. As shown on Table D-11 in Appendix D, weekend parking demand would be only 46 percent of weekday demand, therefore substantial parking would be available for recreational uses on weekends.

4.3.7.4 IMPACTS ON PEDESTRIAN AND BICYCLE FACILITIES

The office and inn/retreat/conference facilities proposed as part of Alternative 3 would increase the number of pedestrians and bicyclists within and in the vicinity of the Letterman Complex. Alternative 3 would generate 180 new pedestrian and bicycle trips during the p.m. peak hour. These trips would be accommodated within the existing pedestrian and bicycle network, as well as the facilities that would be constructed as part of the development.

The impacts associated with improvements at the Lyon Street/Richardson Avenue/Gorgas Avenue intersection (mitigation measure TR-1) on the citywide bicycle network are described under Alternative 1. Relocating a portion of the city's bicycle route 4 as discussed in mitigation measure TR-6 would reestablish this connection.

Implementation of recommended vehicular capacity improvements at the Lombard Street Gate may require adjustment of routes and physical improvements to facilitate access for bicycles currently entering the Presidio via the city's bike route 4 (relocated to Chestnut Street, see mitigation measure TR-6) and bike route 6 (Greenwich Street). The current Presidio Trails and Bikeways Study will consider alternatives to the current access on Lombard Street to include widening the current pedestrian walkway at the Lombard Street Gate, re-establishing the historic opening of the Presidio perimeter wall at Greenwich Street (subject to additional environmental review, including Section 106 compliance), relocating bike route 4 to Gorgas Street or creating an expanded bicycle and pedestrian path from the Lombard Street Gate (see Figure 18).

4.3.7.5 INCREASED DEMAND FOR PUBLIC TRANSPORTATION

The 130 p.m. peak-hour transit trips generated by Alternative 3 would be accommodated on the six existing MUNI bus lines that serve the Presidio. The 29-Sunset and the 82X-Levi Plaza Express are expected to carry the greatest number of transit trips generated by Alternative 3. Planned improvements to transit service to the Presidio, including a peak-period express bus service, more frequent service on MUNI's 29-Sunset line, and the shuttle service to BART, MUNI Metro and the San Francisco Airport as proposed as part of Alternative 3, would also serve to accommodate the increase in transit demand.

The average passenger load on Golden Gate Transit transbay buses during the a.m. and p.m. peak hours is about 30 passengers per bus, and there are about 120 buses per hour during the a.m. peak hour and about 110 buses per hour during the p.m. peak hour for about 23 different transbay routes (Golden Gate Bridge, Highway and Transportation District 1997). Alternative 3 would generate 18 transit trips to the North Bay in the p.m. peak hour. If these project-generated passengers were distributed across the 23 Golden Gate Transit routes proportionally to the existing distribution of passengers across routes, the project would add a maximum of two passengers to each route. Even if all of the passengers added to a single route were on the same bus, the estimated passenger load would not exceed the bus capacity for any one line.

4.3.7.6 IMPACTS OF TRANSPORTATION DEMAND MANAGEMENT MEASURES

In addition to the TDM plan elements described in Alternative 1, the following TDM measures would be included as part of Alternative 3 to encourage non-automobile modes and minimize parking demand:

- Guaranteed-ride-home program
- Shuttle bus service to BART and MUNI Metro

- Car-sharing
- Flex-time policies
- Telecommuting policies
- Inn/retreat airport shuttle
- Onsite support services
- Pedestrian and bicyclist amenities such as onsite showers and changing rooms
- Constrained parking supply to match modal goals
- Preferential carpool/vanpool parking
- Providing monetary incentives to not drive

These TDM measures would support the transit use and discourage single-occupant auto use by office employees by providing incentives for carpooling and not driving (e.g., preferential carpool parking, constraining parking supply, providing monetary incentives and guaranteed-ride-home programs). The shuttle bus to BART and MUNI Metro would encourage transit use and reduce the number of visitors that would drive to the Presidio. The car-sharing program would provide employees the flexibility of using transit, bicycling or walking, while having a vehicle available when needed. Guaranteed ride home, flextime and telecommuting policies would reinforce transit use by allowing employees to adjust their schedules or extend their workdays beyond their normal work hours. The airport shuttle would reduce the need for conference center and other inn/retreat guests to rent a car for trips in the San Francisco area.

A TDM program, as described in mitigation measure TR-8, would be developed that would establish specific performance targets and a monitoring and reporting process.

4.3.7.7 CONSTRUCTION IMPACTS

The impacts associated with additional construction-related traffic on the local and regional traffic network are described under Alternative 1. A construction traffic management plan, as discussed in mitigation measure TR-5, would be developed to provide specific routes and other mitigation measures to minimize traffic impacts.

4.3.8 Cultural Resources

4.3.8.1 EFFECT OF REMOVING LAMC/LAIR AND ADDING NEW CONSTRUCTION

Under this alternative, LAMC and LAIR would be removed and replacement construction of 900,000 square feet would be built. In contrast to the current centralized building layout of LAMC and LAIR, replacement buildings would be lower in height, distributed across the 23 acres, and would complement historic patterns of development found elsewhere around the complex. The Planning Guidelines, finalized under this EIS, and Design Guidelines for new construction would be applied to new construction to achieve a contextual and compatible approach to architecture and site planning within the historic setting. However, replacement construction on the 23-acre site would foreclose the opportunity for the construction of new infill buildings

within the adjacent historic hospital complex as recommended in the GMPA. Therefore, this alternative would preclude enhancing the campus-like setting of the historic landscape and unifying the disjointed remnant historic building cluster. This would constitute an adverse effect on the adjacent historic hospital complex.

Building Massing and Scale – New construction would be compatible with the historic setting through elements of massing, scale and height. The buildings would have narrow rectilinear shapes, which are compatible with existing buildings found throughout the Presidio. The primarily three- and four-story buildings with punched openings, ground floor entries, and shaped roofs would be in keeping with the historic setting. These characteristics comply with the Planning Guidelines objective for compatible massing and scale.

O'Reilly Greensward – The siting of new buildings close to O'Reilly Avenue would not follow the Planning Guidelines' recommendation for a "greensward" along O'Reilly Avenue. In addition, interconnecting the buildings would create an edge that is long and impermeable. These actions would create an adverse effect on the adjacent historic structures. Attention would be given to refining this edge of the site during design review to minimize this adverse effect and make the site design more consistent with the Planning Guidelines' objectives.

Site Circulation – Under this alternative, a pedestrian walk proposed at Torney Avenue would create a major east/west circulation route through the site. In addition, a new road at the eastern edge of the 23-acre site would allow circulation in a north/south direction. Both of these would improve the connection from the 23-acre site to the adjacent historic hospital complex. Additional circulation connections outlined in the Planning Guidelines would be considered during the design development and review process. For example, the axis of Thornburg Avenue and Edie Road would extend visually eastward into the 23-acre site, but no physical path would be created. While this may be inconsistent with the Planning Guidelines, it would not constitute an adverse effect on the historic setting.

4.3.8.2 EFFECT ON EXTANT CULTURAL LANDSCAPE FEATUES

Actions associated within this alternative would have a beneficial effect on the cultural landscape and the National Historic Landmark district as described in Alternative 2.

4.3.8.3 EFFECT DUE TO REMOVAL OF TENNIS COURT (STRUCTURE 1147)

The adverse effect of removal and replacement of this structure is discussed under Alternative 2.

4.3.8.4 EFFECT ON THE PRESIDIO WALL

The effect of the proposed re-introduction of a pedestrian entrance through the Presidio wall along Lyon Street at the Chestnut Street intersection is discussed under Alternative 2.

4.3.8.5 EFFECTS DUE TO INTERSECTION AND ROADWAY IMPROVEMENTS

The effects of intersection improvements would be similar to those described under Alternative 2. Under this alternative, however, Letterman Drive would not be removed and Torney Avenue would be extended only as a pedestrian path and not as a vehicular road corridor, as in Alternative 2. While these roadway improvements would not be inconsistent with the Planning Guidelines, this would not constitute an adverse effect on the historic setting. Changes to internal circulation networks and intersections within the 23-acre site would be made during design review to more closely follow the Planning Guidelines.

4.3.8.6 VISUAL IMPACTS

This alternative, with the removal of LAMC and LAIR, the large paved parking area that occupies the eastern half of the 23-acre site, and the introduction of lower-scaled new construction would enhance the visual integrity of the Letterman Complex. The removal of the 10-story LAMC building, and replacement with new construction limited to 60 feet in height, would substantially improve the views from many vantage points within the Presidio. A central landscaped open space would provide views of the Palace of Fine Arts, which would enhance the scenic qualities of the 23-acre site (refer to Figure 22). Views into the 23-acre site from Lyon Street would be screened by the existing windrow.

The siting of buildings near Lombard Street Gate would alter the visual setting at this important entry point. New construction would reinforce the historic pattern of development for the Letterman Complex, which included buildings very close to the Lombard Street Gate. Sufficient vegetative screening and building setbacks would be provided to minimize these impacts on entry views. The buildings would also be staggered to allow for additional vegetative screening. Views from Lombard Street Gate toward the 23-acre site would produce a new sense of arrival into the Presidio similar to the historic pattern of buildings at this edge.

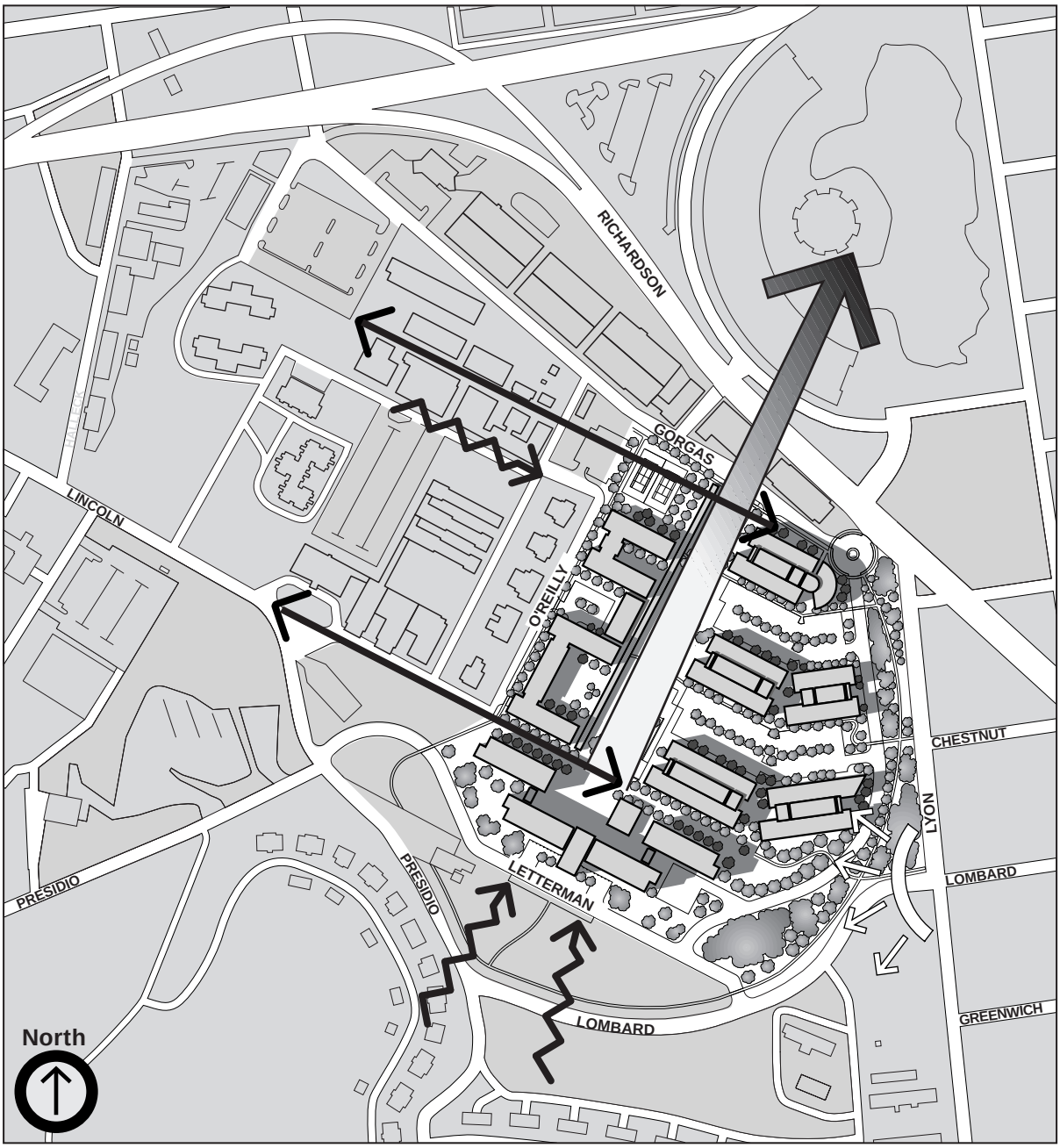
This alternative does not provide north-facing views into the center of the site or to the Palace of Fine Arts from its southern edge. Modifications to the site plan and building design would be considered during design review to enhance these views.

The historic view corridor at Thornburg Road would be preserved. In addition, the historic view corridor at Torney Avenue, which is currently blocked, would be restored. However, this alternative would not preserve the existing historic view corridor at Edie Road. Modifications would be made during design review to avoid negative visual impacts on this view corridor.

4.3.8.7 BENEFICIAL EFFECT ON VISITOR EXPERIENCE

This alternative would have a beneficial effect on the visitor experience. A central village commons would be developed as a public open space for visitors to enjoy. Replacement construction would provide public gathering places and locations for programs open to the public. The variety of uses would create a lively community for residents, tenants and visitors. A lodge would provide conferencing, training and educational programs that would be open to Presidio visitors. This would be complemented by restaurants and convenience services available to the public.

The 23-acre site, as an integral part of the Letterman Complex, would be one of many areas throughout the Presidio which would “tell the story” of the Presidio in support of the five interpretive themes identified in the GMPA. Beneficial actions throughout the Letterman Complex would include the rehabilitation of building 558 as a visitor information center, the introduction of three information/orientation kiosks, public lobby spaces with interpretive information about the complex, and interpretive displays incorporated into the landscape at key spots. These improvements would increase public access and visitor opportunities considerably over what exists today for visitors.



Key Scenic Views and View Corridors

Historic View Corridors

Obstructed Views

Views from Entry Point

Figure 22. Visual Impacts of Alternative 3

4.3.8.8 EFFECT ON ARCHEOLOGICAL PROPERTIES

As discussed in Alternative 2, ground-disturbing activities would have the likelihood of encountering archeological resources. An Archeological Management Assessment and Monitoring Program (described in Appendix F) would be employed to discover, document, protect, and manage the archeological record at the Letterman Complex. As a result of these practices, an adverse effect on archeological properties would be avoided.

4.3.9 Air Quality

4.3.9.1 SHORT-TERM DEMOLITION/CONSTRUCTION IMPACTS

The impacts during demolition of buildings and replacement construction at the 23-acre site would be similar to those shown under Alternative 2. Compliance with the applicable requirements for asbestos control and incorporation of mitigation measures AQ-1, *BAAQMD Control Measures*, and AQ-2, *Demolition of Existing Buildings* into the alternative would reduce the effects of demolition and construction activities to a less-than-significant level.

4.3.9.2 LONG-TERM REGIONAL OPERATION IMPACTS

By 2010, Alternative 3 would result in an increase of up to approximately 5,100 internal and external vehicle trips per day. Based on URBEMIS7G modeling results, increased vehicle trips associated with the alternative would generate approximately 49 lb/day of ROG, 75 lb/day of NO_x, 32 lb/day of PM_{10}, and 561 lb/day of CO. These emission rates are summarized in Table 22. Alternative 3 would not result in regional operational emissions exceeding any of the BAAQMD's significance thresholds for ROG, NO_x, or PM_{10}.

Similar to the impacts under Alternative 1, direct and indirect emissions from the use of electricity and natural gas due to Alternative 3 would not be significant when compared to the emissions caused by project-related traffic, and the alternative would not have the potential to expose nearby receptors to toxic air contaminants.

4.3.9.3 LONG-TERM LOCAL OPERATIONS IMPACTS

Localized CO impacts due to project traffic are described under Alternative 1. Because Alternative 3 2010 traffic would result in fewer than 1,680 vehicles in the p.m. peak hour through the Lombard Street Gate, the localized CO concentrations for Alternative 3 would be less than 7.9 ppm on a 1-hour basis and less than 5.4 ppm on an 8-hour basis. These localized CO concentrations would not exceed the state ambient air quality standards for CO.

4.3.10 Noise

4.3.10.1 SHORT-TERM DEMOLITION/CONSTRUCTION NOISE IMPACTS

The impacts during demolition and construction of the Letterman Complex would be similar to those shown under Alternative 2. Incorporation of mitigation measure NO-1, *Reduction of Construction Noise* into Alternative 3 would reduce the effects of demolition and construction activities to a less-than-significant level for residents, tenants and recreational users outside the Letterman Complex. However, construction noise

would have an unmitigable, potentially significant short-term impact on occupants and recreational users internal to the Letterman Complex.

4.3.10.2 LONG-TERM TRAFFIC NOISE INCREASES

The impacts of traffic noise caused by Alternative 3 would be similar to those described under Alternative 1. Traffic volumes for Alternative 3, including peak traffic volumes for Gorgas Avenue, would be less than those shown for Alternative 1, and the associated noise level increases would be subsequently lower. New lodging and assisted living uses within the Letterman Complex proposed with Alternative 3 would be sensitive receptors, but would be designed with sufficient noise insulation for compliance with Title 24. As such, the traffic noise increases associated with Alternative 3 would not cause a significant impact.

4.3.10.3 LONG-TERM STATIONARY SOURCE NOISE IMPACTS

The impacts of stationary sources of noise associated with Alternative 3 would be similar to those shown under Alternative 1. No significant long-term stationary source noise impacts are expected.

4.3.11 Cumulative Impacts

4.3.11.1 SOLID WASTE

Cumulative impacts due to the disposal of demolition debris under this alternative would be the same as Alternative 2.

4.3.11.2 WATER SUPPLY

The Lobos Creek watershed would be insufficient to supply the in-stream flow requirement necessary to maintain natural streambed characteristics and meet peak Presidio daily demands of 1.66 mgd with this alternative and the other projects listed in Table 9 that are within the Presidio (BAE 1998a). Alternative 3 and the other identified projects within the Presidio would contribute to a net cumulative peak shortfall of approximately 269,000 gpd on the Presidio-wide water supply due to excess demand (BAE 2000). However, water supply- and demand-side measures and instream flow monitoring described in mitigation measures WS-2, *Water Supply- and Demand-Side Solutions to Reduce Cumulative Impacts*, WS-3, *Instream Flow Monitoring to Reduce Cumulative Impacts*, and WT-1, *Water Reclamation Plant to Reduce Cumulative Impacts*, would result in a water savings of approximately 320,000 gpd which would minimize cumulative impacts on the system and baseline stream flow maintained in Lobos Creek.

Projects within the surrounding area would increase water consumption, but according to the city, not in excess of amounts expected and provided for in this area. In general, the projects represent replacement or renovation of existing facilities previously served by the city. New construction would be subject to current city of San Francisco water conservation code requirements. Should the Presidio Trust enter into a water purchase agreement with the city to ensure adequate water supplies during peak demand periods, there would be no significant impact on regional water demand since the pending purchase agreement would essentially replace previous agreements held by both the U.S. Army and NPS with the city.

4.3.11.3 SCHOOLS

The cumulative impacts to SFUSD resulting from this alternative would be similar to Alternative 1.

4.3.11.4 HOUSING

This alternative and the other projects listed in Table 9 would add 3,261 employees to the local economy. The new development within the 23-acre site accounts for 2,000 jobs, or 61 percent of this total. This growth in employment is estimated to require 628 new housing units (BAE 2000). The listed projects include provision of 1,331 new housing units (1,304 renovated units on the Presidio and 27 new units in the Marina District.) The housing demand resulting from the projects would be more than offset by the housing units added to the local supply, largely by reactivation of housing at the Presidio. Therefore, cumulative demand under this alternative would not contribute to employment-related housing demand increases in the surrounding neighborhood or city.

4.3.11.5 TRAFFIC AND TRANSPORTATION SYSTEMS

The traffic generated by land uses under this alternative would contribute to the expected increases in cumulative traffic volumes on adjacent local and regional roadways. Alternative 3 would contribute 24 percent of the total p.m. peak-hour traffic resulting from these cumulative projects (Table 19). The combined cumulative projects, including Alternative 3, would generate increased traffic volumes throughout the Presidio. The cumulative projects would create 330 additional vehicles on Lincoln Boulevard during the p.m. peak hour, and Alternative 3 would make up about 13 percent of the additional traffic. Similar to Alternative 2, the cumulative increase in traffic would cause significant impacts at two of the project impact zone intersections. However, mitigation measures TR-2, *Lombard Street/Lyon Street Intersection Improvements*, and TR-3, *Lombard Street/Presidio Boulevard Intersection Improvements*, would improve the LOS at these intersections to acceptable levels (LOS D or better), as shown in Table 20.

The parking demand generated by cumulative projects, including Alternative 3, is estimated to be 4,392 spaces, or about 170 spaces more than Alternative 2, as shown in Table 21. Alternative 3 would comprise about 34 percent of the total cumulative parking demand within the Presidio and 29 percent of the total cumulative parking demand within the project impact zone. The proposed parking supply within the 23-acre site in Alternative 3 would exceed the projected parking demand, as discussed in Section 4.3.7.3. The 8,390 parking spaces provided within the Presidio (as described in the 1994 GMPA), would be adequate for the expected cumulative parking demand within the Presidio. The parking impacts outside of the Presidio would be comparable to those described in Alternative 2.

The alternative's contribution to cumulative growth would have a minor cumulative effect on local and regional traffic growth and related congestion, and would be similar to Alternative 2.

4.3.11.6 CULTURAL RESOURCES

Under this alternative, LAMC and LAIR would be removed and replacement construction of 900,000 square feet would be built. In contrast to the current centralized building layout of LAMC and LAIR, replacement buildings would be lower in height, distributed across the 23 acres, and would complement historic patterns of development found elsewhere around the complex. The Planning Guidelines, finalized under this EIS, and Design Guidelines for new construction would be applied to new construction to achieve a contextual and compatible approach to architecture and site planning within the historic setting. However, replacement construction on the 23-acre site would not allow for the construction of new infill buildings within the adjacent historic hospital complex as recommended in the GMPA. Therefore, this alternative would not contribute to cumulative beneficial effects on the National Historic Landmark district.

4.3.11.7 AIR QUALITY

Proposed development under Alternative 3 and the projects identified in Table 9 would contribute to a cumulative increase in vehicle trips on the region's roadways and would contribute to cumulative increases in regional emissions. The cumulative operational emissions would cause localized impacts at congested intersections in the vicinity of the projects, but the resulting impacts would not be expected to cause local violations of ambient air quality standards. Anticipated cumulative increases in vehicle trips would also result in increases to region-wide emissions of ozone precursors (including NO_x and ROGs) and CO. The proposed development would cause emissions of ozone precursors that fall below the thresholds set forth in federal regulations for conformity determinations (as shown in Table 22). Because emissions of ozone precursors would be less than the applicability thresholds, a conformity determination is not necessary for ozone. Emissions of CO that would be caused by the cumulative scenario under Alternative 3 are accounted for in the current maintenance plan for CO, as discussed in Section 5.4.2. Because the projects are in conformance with regional air quality plans, no further conformity analysis is necessary, and no significant cumulative impacts would occur.

4.3.11.8 NOISE

Demolition and construction activities under Alternative 3, in combination with the project to reconstruct Doyle Drive, would cause short-term cumulative noise impacts if the two projects were to be under construction at the same time. Long-term cumulative impacts around the Letterman Complex would primarily result from increased traffic on Doyle Drive (U.S. Highway 101). The long-term cumulative effect of Alternative 3 and other projects within the Presidio and nearby portions of San Francisco would be increased traffic noise on most of the roads internal and external to the Presidio.

Because the surroundings are dominated by traffic noise in the existing conditions, approximately two-fold increases in traffic would have to result from cumulative development in order to cause increases in traffic noise that would be noticeable to most people. Cumulative development with Alternative 3 would cause peak-hour traffic increases along Lombard Street, inside the Presidio, that could result in noticeable noise increases, but no noise sensitive receptors are located along this segment. None of the roadway segments near noise sensitive receptors would experience greater than two-fold peak-hour traffic increases. The conclusion in the GMPA Final EIS that long-term cumulative traffic-induced noise levels would increase due to increases in vehicle volumes remains applicable; however, the increases near sensitive receptors would not be considered significant. No significant cumulative noise impacts are expected.

4.3.12 Unavoidable Adverse Effects

The following impacts are identified as potentially significant and for which there are no mitigating measures or that would not be mitigated to a level of insignificance.

Housing – This alternative would incrementally contribute to the unmet affordable housing demand in the city of San Francisco. Reduced rental rates offered to Presidio employee and tenant households with gross household incomes of less than $45,000 would offset some of this demand.

Cultural Resources – To the extent new construction would not conform to the Planning Guideline recommendations, the following departures would have a potential adverse effect on the historic and visual setting:

- Removal of LAMC and LAIR and replacement construction consistent with Planning and Design Guidelines would not allow for infill construction as recommended in the GMPA which would have an adverse effect on the adjacent historic hospital complex.
- The siting and length of buildings along O'Reilly Avenue would have an adverse effect on adjacent historic structures.
- The removal of the two historic tennis courts would have an adverse effect on these historic structures.
- The historic view corridor at Edie Road would be blocked by the proposed building layout.

Noise – Short-term use of impact tools and demolition activities would be a source of increased noise to occupants and passive recreational users within the Letterman Complex. Mitigation measures proposed to reduce intrusions would reduce noise impacts but not to a level of insignificance to those closest to (i.e., within 250 feet from) construction equipment.

4.3.13 Relationship of Short-Term Uses of the Environment and Maintenance and Enhancement of Long-Term Productivity

Use of the site for offices, a hotel, conference center, senior assisted living and other development would preclude other long-term management possibilities for the 23 acres. This use would occur within an intensively used area within the northern part of the Presidio which would allow areas in the south and along the coast to remain more natural and experience less activity and development. Reinforcement of this overall use pattern would minimize impacts on the productivity of park resources.

Use of the site for a mixed-use development would not affect any park ecosystem. Improvements to existing infrastructure would be considered sustainable actions that are expected to improve the operation of systems. Through implementation of the Planning Guidelines for the project, the Presidio Trust would promote environmental protection and sustainable design and encourage technologies and practices that would reduce environmental impacts or produce environmental benefits in water conservation and reclamation, energy conservation and transportation.

4.3.14 Irreversible or Irretrievable Commitments of Resources

The mixed-use development would be designed and constructed to minimize consumption of energy and development of non-renewable fuels. Renewable sources of energy and new developments in energy-efficient technology, including recycling of materials and waste, would be fully explored and implemented to the extent possible. Although new development could be restored to previous conditions over time, the use of land,

construction materials, energy, and financial resources to implement the alternative would, in a practical sense, be an irretrievable commitment of resources.

Archeological resources would be avoided where possible and historic resources would be protected. Where this is not possible, disturbance would be mitigated through recovery of cultural information and significant artifacts.

4.4.1 Consistency with Approved Plans and Policies

4.4.1.1 GENERAL OBJECTIVES OF THE GMPA AND PURPOSES OF GGNRA ACT

Alternative 4 is consistent with the General Objectives of the GMPA, which are identified in Section 1.1.5 of this document. Foremost, it is consistent with the General Objective of sustaining the Presidio indefinitely, both economically and physically, through the development team's organizational and financial capabilities to undertake capital investments, operate programs, and make contributions to help preserve the park's unique historic and natural qualities. This alternative is consistent with meeting the Trust Act's financial self-sufficiency mandate and the requirement that the Trust give priority to tenants that enhance the financial viability of the Presidio.

Removal of both the LAMC and LAIR buildings, modern structures that block view corridors and are architecturally non-distinctive, would be consistent with the GMPA's General Objective to enhance the scenic resources of the Presidio. Removal of LAMC and LAIR is also consistent with the General Objective of enhancing the Presidio's cultural resources by assisting in rehabilitating historic settings to permit an understanding of the site's significance to the National Historic Landmark district. In furtherance of this General Objective, design and siting of new construction would promote the enhancement and rehabilitation of scenic vistas, including views to the Palace of Fine Arts. New construction to replace the monolithic and architecturally non-distinctive buildings with those better tailored to the mass, scale, color, and materials of other structures in the Letterman Complex and the Presidio would be in keeping with preservation of the character and integrity of the National Historic Landmark district. Consistent with the General Objective to provide for uses that involve stewardship and sustainability, replacement construction would promote principles of sustainable design and technology. Furthering this General Objective, hand-dismantling and salvaging of materials prior to building demolition and conservation and recycling strategies to be employed within the buildings and by tenants would promote and demonstrate conservation practices, including waste reduction and recycling.

The alternative is consistent with the General Objective to provide for appropriate uses of the Presidio. Alternative 4's anchor tenant, a media/Internet programming company, and the women's small business hi-tech incubator would be consistent with the GMPA's General Objective to provide uses that involve the arts, education, research, innovation, and communication. These uses would complement park-related programs and activities in the areas of Internet-based research and development and telecommunications (areas which could not have been envisioned during preparation of the GMPA in 1994). In addition, the visitor's center, the international environmental organization and the national foundation supporting national parks, and the museum and cultural center would also be consistent with the General Objective of the GMPA to provide uses that involve stewardship and sustainability, community service and restoration, research, education, and communication. In addition, the international environmental organization and the museum and cultural center would contribute to the additional General Objective of cross-cultural and international cooperation uses. The branch library of the California State library system and the local historical society would similarly be

consistent with the GMPA's General Objective to provide uses that involve education, research, and communication.

The provision of a substantial live/work component would enhance the Presidio Trust's ability, and therefore be consistent with the General Objective, to increase open space in other parts of the park while sustaining the Presidio economically. The live/work component would also be consistent with the GMPA's General Objective of addressing the needs of Presidio visitors, tenants, and residents. In addition, tenant programs to reduce automobile use and parking demand, as well as the live/work concept of this alternative, would be consistent with the General Objectives of the GMPA of meeting tenant and resident needs while minimizing impacts on neighboring communities.

Alternative 4 is consistent with the purposes of the GGNRA Act, which are identified in Section 1.1.5 of this document. Primarily by focusing more intensive use into an area that has been previously developed, Alternative 4 preserves the recreation area as far as possible in its natural setting. New construction would be subject to sound land use planning, including implementation of the Planning Guidelines and design review, so that it would not degrade scenic views and the natural setting.

4.4.1.2 PRESIDIO GENERAL MANAGEMENT PLAN AMENDMENT

Alternative 4 is also consistent with a number of the more specific goals and planning principles of the GMPA. This alternative would foster the GMPA's proposed major directions for the future of the Presidio by perpetuating the site as a building and activity core. New construction would replace the LAMC as permitted under the GMPA since the LAMC would not meet essential program and management needs.

In certain respects, Alternative 4 does not match the GMPA's site-specific plan. This alternative would not promote the GMPA concept for infill construction within the complex but would focus replacement construction within a 23-acre site. Because replacement construction would occur within only a portion of the potential sites that were identified on a preliminary basis as referenced in the GMPA (i.e., outside the historic hospital complex), the alternative would not reinforce the historic hospital complex's courtyard as encouraged by the GMPA. Whereas the GMPA assumed the rehabilitation and reuse of LAIR, demolition of the LAIR and other existing buildings that have been demolished or are designated for demolition so as to allow new replacement construction would also increase the total amount of gross square feet of replacement construction within the complex as envisioned in the GMPA from 503,000 to approximately 900,000 square feet. Nevertheless, the GMPA's key restrictions on maximum allowable square footage for the complex (1.3 million square feet) and maximum allowable height of new construction (60 feet) would not be exceeded by this alternative. Furthermore, replacement construction would proceed in accordance with the Planning Guidelines (provided in Appendix B) and design review as recommended within the GMPA to ensure that new construction would be compatible with the adjacent historic buildings and patterns of development.

Alternative 4's uses would complement park-related programs and activities in the areas of Internet-based research and development and telecommunications (areas which could not have been envisioned during preparation of the GMPA in 1994). In addition, the anchor tenant would enliven the park with a program of national and international distinction serving a national and international audience. These users would also advance the GMPA's specific programs to provide research, education, and training in the principles and

practices of resource stewardship within and beyond park boundaries. And, the international environmental organization and the museum and cultural center would contribute to cross-cultural and international cooperation. The branch library of the California state library system and the local historical society would also promote the GMPA Presidio-wide principles regarding interpretation and education, as well as collection preservation. Together, these tenants would assist in making the Presidio a center for research and learning.

Provision of housing at the site would support the GMPA's specific goal to provide housing for employees of tenant organizations and to create a lively community that contributes to the site. It would also support the GMPA's specific long-term goal of clustering housing opportunities near and within the park's work and major activity centers. Provision of limited retail facilities and services within walking distance of housing would reinforce the GMPA's neighborhood concept. Tenant programs to reduce automobile use and parking demand, as well as the live/work concept of this alternative, would further the GMPA's specific goals of reducing automobile use and making the Presidio an environmental model of sustainable development.

This alternative, however, would not implement the specific proposal in the GMPA for the Letterman Complex to serve as a science and education center devoted to issues of health, life and earth sciences. Since to date no suitable tenant has been identified for the site that would adhere to the GMPA's specific proposal, this potential land use conflict cannot be resolved. However, mitigation measures identified in Section 4.7 would be implemented to lessen adverse impacts of this alternative.

4.4.1.3 SAN FRANCISCO GENERAL PLAN

While the Presidio is not subject to the General Plan, this alternative would be consistent with the General Plan policies of including housing in business developments. However, it may not be consistent with the policy to restrict business activities of city-wide importance to districts devoted to and designated for business services.

4.4.2 Solid Waste

4.4.2.1 DISPOSAL OF DEMOLITION DEBRIS OFFSITE

The impacts of this alternative on solid waste sites located in the Bay Area are similar to those discussed for Alternative 2. Due to the demolition of both the LAMC and LAIR buildings as proposed under this alternative, Alternative 4 would generate 80,000 tons of construction debris. This represents 44,600 (55 percent) more tons of debris than Alternative 1. Appropriate landfill sites are available in the Bay Area, landfill operators have sufficient capacity and are willing to accept the material, and at least 50 percent of the debris would be diverted from the landfills. Thus, Alternative 4 is expected to result in a less-than-significant impact on regional solid waste disposal facilities.

4.4.3 Water Supply and Distribution

4.4.3.1 IMPACTS OF WATER CONSUMPTION ON AVAILABLE WATER

Alternative 4 would demand approximately 64,000 gpd of water (Tables 12 and 13). This figure assumes the use of 11,781 gpd of gray water captured onsite for a portion of the landscape irrigation. The estimated water

consumption of this alternative is well below the 89,000 gpd baseline estimate established for the site. Since the estimated water consumption of this alternative is below the threshold for the site, Alternative 4 is not expected to have a negative effect on the Presidio water supply. Nevertheless, the development team should adopt water conservation measures implemented by the Presidio Trust and described in mitigation measure WS-2, *Water Supply- and Demand-Side Solutions to Reduce Cumulative Impacts* to further reduce water consumption.

4.4.3.2 IMPACTS ON FIRE FLOWS

Improvements to the water distribution system may be required to ensure adequate fire flow to new development with the Letterman Complex to meet the Uniform Fire Code depending on the characteristics of buildings to be constructed (see mitigation measure WS-1, *Fire Flows*).

4.4.4 Schools

4.4.4.1 IMPACT ON CAPACITY AT EXISTING OR NEW SCHOOL SITES

Alternative 4 would generate 273 schoolchildren who would enroll in SFUSD schools (Table 14). The SFUSD Education Placement Center, the office responsible for managing enrollment and placing children within SFUSD schools, stated that these schoolchildren, who are likely to attend schools in the neighborhoods surrounding the Presidio, would not require the SFUSD to develop new capacity within existing or new school sites (personal communication with Margaret Wells, Program Director of the Education Placement Center). Because this level of enrollment is within the existing capacity of SFUSD, Alternative 4 is not expected to result in an adverse impact on SFUSD schools.

4.4.5 Housing

4.4.5.1 INCREASE IN HOUSING DEMAND

At buildout, the additional regional housing demand created by employment associated with Alternative 4 from outside of the Bay Area would be 462 housing units (Table 15). The Presidio housing stock, including the 400 to 450 units to be constructed onsite, would accommodate 100 percent of this housing demand. Since Alternative 4's housing demand generated by new employment from outside the Bay Area can be accommodated at the Presidio, this alternative would not adversely impact the housing market within San Francisco and the surrounding Bay Area.

4.4.6 Medical Research

4.4.6.1 IMPACT ON MEDICAL RESEARCH

Implementation of this alternative would preclude the use of the site for medical and life science research. The impact of not providing medical research space at the site is described under Alternative 3.

4.4.7 Traffic and Transportation Systems

Under Alternative 4, the existing roadway network within the 23-acre site would be slightly modified, but access points to the site would be similar to those that currently exist. Improvements to the intersection(s) of Lyon Street/Richardson Avenue/Gorgas Avenue would allow for left turns into the site from westbound Richardson Avenue. The Gorgas Avenue Gate would be the primary entrance, with the Lombard Street Gate serving as a secondary entrance. Alternative 4 would also include improvements to the pedestrian and bicycle circulation network within the complex, as well as improved connections to adjacent areas. Alternative 4 assumes a total of 100 above-grade parking spaces and 1,290 underground parking spaces within the site, of which 400 spaces would serve residential areas and 890 spaces would serve office buildings.

4.4.7.1 ADDITIONAL TRAFFIC VOLUMES

Alternative 4 would generate 5,140 external (i.e., to areas outside the Presidio) weekday daily vehicle-trips and 600 vehicle-trips during the p.m. peak hour into and out of the Presidio (Table 16). As offices would be the predominant use at the site, most of the 600 p.m. peak-hour trips would be leaving the site, with 370 outbound trips (primarily employees leaving the office) and 230 inbound trips (primarily residents returning home) (Table D-9 in Appendix D).

Between existing and future year 2010 conditions, the Mason Street Gate would incur an increase of 370 vehicles during the p.m. peak hour, with project-related traffic comprising 16 percent of this increase. Alternative 4 would contribute the majority of the traffic volume increase at the Gorgas Avenue Gate. Traffic volumes at this gate would increase by 600 vehicles during the p.m. peak hour, with project-generated traffic comprising 65 percent of this growth. The existing p.m. peak-hour traffic volumes at the Lombard Street Gate would be increased by 410 vehicles. Fourteen percent of this increase would be due to Alternative 4. The existing p.m. peak-hour traffic volumes at the Presidio Boulevard Gate would increase by 230 vehicles, with project-related traffic comprising 40 percent of this increase (Table 17).

4.4.7.2 IMPACTS ON INTERSECTION OPERATING CONDITIONS

Currently, during the p.m. peak hour, two of the study intersections operate at LOS C, four intersections operate at LOS B and one intersection operates at LOS A (Table 4). Under Alternative 4, three of the study intersections (Presidio Boulevard/Letterman Drive/Lincoln Boulevard, Mason Street/Marina Boulevard/Lyon Street, and Doyle Drive/Marina Boulevard/Lyon Street) would operate acceptably at LOS C during the p.m. peak hour (Table 18). Impacts to nearby intersections would be similar to Alternative 2 (Table 18). The intersections of Lombard Street/Lyon Street and Presidio Boulevard/Lombard Street would fail, operating at LOS F and LOS E, respectively. Recommended improvements as described in mitigation measures TR-2, *Lombard Street/Lyon Street Intersection Improvements*, and TR-3, *Lombard Street/Presidio Boulevard Intersection Improvements*, in Section 4.6.6 and illustrated in Figures 16 and 17 would improve the operating conditions at the intersection of Lombard Street/Lyon Street from LOS F to LOS B and at the intersection of Presidio Boulevard/Lombard Street from LOS E to LOS D.

4.4.7.3 INCREASED PARKING DEMAND

Alternative 4 assumes a parking supply of 1,390 parking spaces. The provision of housing as part of this alternative would partially offset the demand generated by the office uses. The parking demand of 1,160

parking spaces for Alternative 4 land uses would be less than the proposed supply of 1,390 spaces. Therefore, there would be no significant impact on parking in Area A or adjacent neighborhoods. As shown on Table D-11 in Appendix D, weekend parking demand would be only 57 percent of weekday demand; therefore, substantial parking would be available for recreational uses on weekends.

4.4.7.4 IMPACTS ON PEDESTRIAN AND BICYCLE FACILITIES

Alternative 4 would result in a substantial increase in pedestrian and bicycle activity within and in the vicinity of the Letterman Complex. Alternative 4 would add 270 new pedestrian and bicycle trips during the p.m. peak hour. These new trips would be accommodated within the existing pedestrian and bicycle network. In addition, planned improvements would enhance the pedestrian and bicycle environment.

The impacts associated with improvements at the Lyon Street/Richardson Avenue/Gorgas Avenue intersection (mitigation measure TR-1) on the citywide bicycle network are described under Alternative 1. Relocating a portion of the city's bicycle route 4 as discussed in mitigation measure TR-6 would reestablish this connection.

Implementation of recommended vehicular capacity improvements at the Lombard Gate may require adjustment of routes and physical improvements to facilitate access for bicycles currently entering the Presidio via the city's bike route 4 (relocated to Chestnut Street; see mitigation measure TR-6) and bike route 6 (Greenwich Street). The current Presidio Trails and Bikeways Study will consider alternatives to the current access on Lombard Street to include widening the current pedestrian walkway at the Lombard Gate, re-establishing the historic opening of the Presidio perimeter wall at Greenwich Street (subject to additional environmental review, including Section 106 compliance), relocating bike route 4 to Gorgas Street or creating an expanded bicycle and pedestrian path from the Lombard Street Gate (see Figure 18).

4.4.7.5 INCREASED DEMAND FOR PUBLIC TRANSPORTATION

Alternative 4 would generate 180 p.m. peak hour transit trips on the six existing MUNI bus lines that currently serve the Presidio. Planned improvements to transit service to the Presidio, including a peak period express bus service and more frequent service on MUNI's 29-Sunset line, would also serve to accommodate the increase in transit demand.

The average passenger load on Golden Gate Transit transbay buses during the a.m. and p.m. peak hours is about 30 passengers per bus, and there are about 120 buses per hour during the a.m. peak hour and about 110 buses per hour during the p.m. peak hour for about 23 different transbay routes (Golden Gate Bridge, Highway and Transportation District 1997). Alternative 4 would generate 26 transit trips to the North Bay in the p.m. peak hour. If these project-generated passengers were distributed across the 23 Golden Gate Transit routes proportionally to the existing distribution of passengers across routes, the project would add a maximum of three passengers to each route. Even if all of the passengers added to a single route were on the same bus, the estimated passenger load would not exceed the bus capacity for any one line.

4.4.7.6 IMPACTS OF TRANSPORTATION DEMAND MANAGEMENT MEASURES

In addition to the TDM plan elements described in the GMPA, the following TDM measures would be included as part of Alternative 4 to encourage non-automobile modes and minimize parking demand:

- Guaranteed-ride-home program
- Car-sharing
- Bicycle-sharing
- Webpage devoted to transportation alternatives
- Flex-time policies
- Telecommuting policies
- Pedestrian and bicyclist amenities such as onsite showers and changing rooms
- Preferential carpool/vanpool parking
- Time limits for short-term parking supply
- Providing monetary incentives to not drive
- Transportation coordinator
- Carpool/vanpool matching
- Vanpool program
- Shuttle to BART and MUNI Metro
- New employee orientations
- Onsite retail
- Subsidize improved MUNI service

These TDM measures would support transit use and discourage single-occupant auto use by office employees by providing incentives for carpooling and not driving (e.g., preferential carpool parking, monetary incentives, and guaranteed-ride-home programs). The car-sharing program would provide employees and residents the flexibility of using transit, bicycling or walking, while having a vehicle available when needed. Telecommuting policies would reduce the number of person-trips traveling to and from the Letterman Complex.

A TDM program, as discussed in mitigation measure TR-8, would be developed that would establish specific performance targets and a monitoring and reporting process.

4.4.7.7 CONSTRUCTION IMPACTS

The impacts associated with additional construction-related traffic on the local and regional traffic network are described under Alternative 1. A construction traffic management plan, as discussed in mitigation measure TR-5, would be developed to provide specific routes and other mitigation measures to minimize traffic impacts.

4.4.8 Cultural Resources

4.4.8.1 EFFECT OF REMOVING LAMC/LAIR AND ADDING NEW CONSTRUCTION

Under this alternative, LAMC and LAIR would be removed and replacement construction of 900,000 square feet would be built. In contrast to the current centralized building layout of LAMC and LAIR, replacement buildings would be lower in height, distributed across the 23 acres, and would complement historic patterns of development found elsewhere around the complex. The Planning Guidelines, finalized under this EIS, and Design Guidelines for new construction would be applied to new construction to achieve a contextual and compatible approach to architecture and site planning within the historic setting. However, replacement construction on the 23-acre site would foreclose the opportunity for the construction of new infill buildings within the adjacent historic hospital complex as recommended in the GMPA. Therefore, this alternative would preclude enhancing the campus-like setting of the historic landscape and unifying the disjointed remnant historic building cluster. This would constitute an adverse effect on the adjacent historic hospital complex.

Building Massing and Scale – With regard to massing and building heights, proposed new construction would follow the height limits outlined in the Planning Guidelines to be compatible with the historic setting. The massing and bulk of the four office buildings (see Figure 7) would be out of scale with and have an adverse effect on adjacent historic structures along O'Reilly Avenue. These buildings would be modified during design review to ensure they would be compatibly designed and sited in keeping with the historic setting following the Planning Guidelines. The new residential buildings are narrow, rectilinear shapes, compatible with the historic fabric of existing building footprints found throughout the Presidio. The primarily three- and four-story buildings with punched openings, ground floor entries, and details such as porches and pitched roofs would be compatible with the setting and in accordance with the Planning Guidelines.

O'Reilly Greensward – This alternative includes a greensward along O'Reilly Avenue that creates a buffer between the new construction and the adjacent historic structures, as recommended by the Planning Guidelines. While this green space is enclosed at its north and south ends, this would not constitute an adverse effect on the structures. Modifications to the siting of these buildings would be considered during design review to open the ends of the greensward as recommended by the Planning Guidelines.

Gorgas – Several mixed-use buildings would be sited along the Gorgas Avenue edge of the 23-acre site and would be consistent with the Planning Guidelines' recommendation for this edge.

Site Circulation –The pattern of new streets and pedestrian routes within the 23 acres would achieve the overall goals of the Planning Guidelines and connect the site with the adjacent historic hospital complex. Proposed new road connections would provide clear and accessible north/south connections through the site with a direct connection between O'Reilly Avenue and Letterman Drive at the west edge and a new road at the center of the site via Letterman Drive. Indirect east/west routes would provide cross-site movement at Chestnut Street, Torney Avenue and Edie Street. In general, the scale and pattern of proposed new streetscapes would be in keeping with the historic setting and would connect the adjacent historic hospital complex to the 23-acre site.

4.4.8.2 BENEFICIAL EFFECT ON EXTANT CULTURAL LANDSCAPE FEATURES

The effects of the actions described under this alternative would be similar to those under Alternative 2.

4.4.8.3 ADVERSE EFFECT OF REMOVAL OF TENNIS COURT (STRUCTURE 1147)

The adverse effect of removal and replacement of this structure is discussed under Alternative 2.

4.4.8.4 EFFECT ON THE PRESIDIO WALL

The effect of the proposed re-introduction of a pedestrian entrance through the Presidio wall along Lyon Street at the Chestnut Street intersection is discussed under Alternative 2.

4.4.8.5 EFFECT DUE TO INTERSECTION AND ROADWAY IMPROVEMENTS

The effect due to intersection improvements would be similar to that described in Alternative 2. However, under this alternative, Letterman Drive would not be removed. Torney Avenue would be extended in the eastward direction to provide access into the center of the site. This would not have an adverse effect on the historic setting.

4.4.8.6 VISUAL IMPACTS

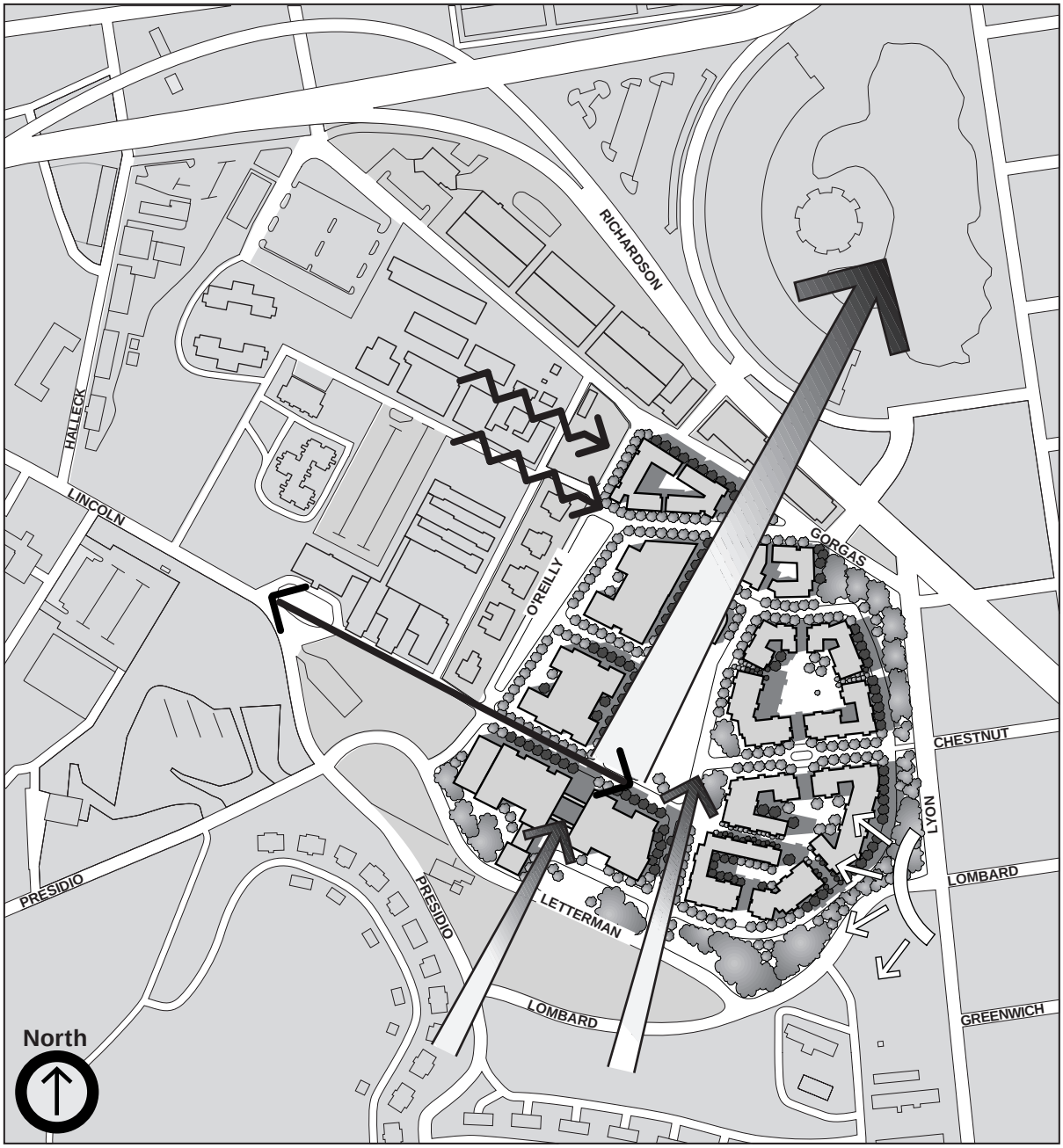
This alternative, with the removal of LAMC and LAIR, the large paved parking area that occupies the eastern half of the 23-acre site, and the introduction of lower-scaled new construction would enhance the visual integrity of the Letterman Complex. The removal of the 10-story LAMC building, and replacement with new construction limited to 60 feet in height, would substantially improve the views from many vantage points within the Presidio. A central landscaped open space would provide views of the Palace of Fine Arts, which would enhance the scenic qualities of the 23-acre site (refer to Figure 23). Views into the 23-acre site from Lyon Street would be screened by the existing windrow.

The siting of buildings near Lombard Street Gate would alter the visual setting at this important entry point. New construction would reinforce the historic pattern of development for the Letterman Complex, which included buildings very close to the Lombard Street Gate. Sufficient vegetative screening and building setbacks would be provided to minimize these impacts on entry views. The buildings would also be staggered to allow for additional vegetative screening. Views from Lombard Street Gate toward the 23-acre site would produce a new sense of arrival into the Presidio similar to the historic pattern of buildings at this edge.

This alternative would enhance north-facing views into the center of the site and to the Palace of Fine Arts from its southern edge. In addition, the historic view corridor at Torney Avenue would be opened up, which would enhance the visual continuity of the site with the adjacent historic hospital complex. However, the existing historic view corridors at Thornburg and Edie roads would not be maintained, which would have a negative effect on the visual quality of the complex. Modifications would be made during design review to improve viewing opportunities along this corridor.

4.4.8.7 BENEFICIAL EFFECT ON VISITOR EXPERIENCE

This alternative would have a beneficial impact on the visitor experience. A central public green park area would provide opportunities for informal and planned public activities. A new pavilion at the green would be used for programs such as dance, drama, and musical performances. The market hall would provide a public gathering place. Education programs on conservation, sustainability, Internet technology, and environmental themes would be offered for the Presidio community and visitors. A branch library on history and genealogy, in conjunction with museum and cultural center activities, would provide new visitor opportunities.



Key Scenic Views and View Corridors

Historic View Corridors

Obstructed Views

Views from Entry Point

Figure 23.
Visual Impacts of Alternative 4

The 23-acre site, as an integral part of the Letterman Complex, would be one of many areas throughout the Presidio which would "tell the story" of the Presidio in support of the five interpretive themes identified in the GMPA. Other beneficial actions would include the introduction of information/orientation kiosks, public lobby spaces with interpretive information about the complex, and interpretive displays incorporated into the landscape at key spots. These improvements would increase public access and visitor opportunities considerably over what exists today for visitors.

4.4.8.8 EFFECT ON ARCHEOLOGICAL PROPERTIES

As discussed in Alternative 2, ground-disturbing activities would have the likelihood of encountering archeological resources. An Archeological Management Assessment and Monitoring Program (described in Appendix F) would be employed to discover, document, protect, and manage the archeological record at the Letterman Complex. As a result of these practices, an adverse effect on archeological properties would be avoided.

4.4.9 Air Quality

4.4.9.1 SHORT-TERM DEMOLITION/CONSTRUCTION IMPACTS

The impacts during demolition of buildings and replacement construction at the 23-acre site would be similar to those shown under Alternative 2. Compliance with the applicable requirements for asbestos control and incorporation of mitigation measures AQ-1, *BAAQMD Control Measures*, and AQ-2, *Demolition of Existing Buildings* into the alternative would reduce the effects of demolition and construction activities to a less than significant level.

4.4.9.2 LONG-TERM REGIONAL OPERATION IMPACTS

Alternative 4 would result in an increase of up to approximately 6,450 internal and external vehicle trips per day. Based on URBEMIS7G modeling results, increased vehicle trips associated with the alternative would generate approximately 55 lb/day of ROG, 90 lb/day of NO_x, 39 lb/day of PM_{10}, and 671 lb/day of CO. These emission rates are summarized in Table 22. Alternative 4 would result in regional operational emissions exceeding the BAAQMD's significance thresholds for NO_x. Implementation of TDM measures identified in the Traffic and Transportation Systems section would encourage alternatives to automobile use, contribute to improvements in air quality and lower NO_x emissions.

Similar to the impacts under Alternative 1, direct and indirect emissions from the use of electricity and natural gas due to Alternative 4 would not be significant when compared to the emissions caused by project-related traffic, and the alternative would not have the potential to expose nearby receptors to toxic air contaminants.

4.4.9.3 LONG-TERM LOCAL OPERATIONS IMPACTS

Localized CO impacts due to project traffic are described under Alternative 1. Because Alternative 4 2010 traffic would result in fewer than 1,680 vehicles in the p.m. peak hour through the Lombard Street Gate, the localized CO concentrations for Alternative 4 would be less than 7.9 ppm on a 1-hour basis and less than 5.4 ppm on an 8-hour basis. These localized CO concentrations would not exceed the state ambient air quality standards for CO.

4.4.10 Noise

4.4.10.1 SHORT-TERM DEMOLITION/CONSTRUCTION NOISE IMPACTS

The impacts during demolition and construction of the Letterman Complex would be similar to those described under Alternative 2.

4.4.10.2 LONG-TERM TRAFFIC NOISE INCREASES

The impacts of traffic noise caused by Alternative 4 would be similar to those described under Alternative 1. Traffic volumes for Alternative 4, including peak traffic volumes for Gorgas Avenue, would be approximately 11 percent above those shown for Alternative 1. The resulting traffic noise levels would be approximately 0.5 dB greater than those shown in Alternative 1. This means that traffic noise levels along Gorgas Avenue would be approximately 71 dBA within 25 feet of the centerline and less than 68 dBA beyond 50 feet. As with Alternative 1, users of the new open space in the Letterman Complex would not be considered to be sensitive receptors, and the noise levels would be compatible with the proposed uses. New housing uses within the Letterman Complex proposed with Alternative 4 would be sensitive receptors, but would be designed with sufficient noise insulation equivalent to that which would comply with Title 24. As such, the traffic noise increases associated with Alternative 4 would not cause a significant impact.

4.4.10.3 LONG-TERM STATIONARY SOURCE NOISE IMPACTS

The impacts of stationary sources of noise associated with Alternative 4 would be similar to those shown under Alternative 1. No significant long-term stationary source noise impacts are expected.

4.4.11 Cumulative Impacts

4.4.11.1 SOLID WASTE

Cumulative impacts due to the disposal of demolition debris under this alternative would be the same as Alternative 2.

4.4.11.2 WATER SUPPLY

The Lobos Creek watershed would be insufficient to supply the in-stream flow requirement necessary to maintain natural streambed characteristics and meet peak Presidio daily demands of 1.66 mgd with this alternative and the other projects listed in Table 9 that are within the Presidio (BAE 1998a). Alternative 4 and the other identified projects within the Presidio would contribute to a net cumulative peak shortfall of approximately 265,000 gpd on the Presidio-wide water supply due to excess demand (BAE 2000). However, water supply- and demand-side measures and instream flow monitoring described in mitigation measures WS-2, *Water Supply- and Demand-Side Solutions to Reduce Cumulative Impacts*, WS-3, *Instream Flow Monitoring to Reduce Cumulative Impacts*, and WT-1, *Water Reclamation Plant to Reduce Cumulative Impacts*, would result in a water savings of approximately 320,000 gpd which would minimize cumulative impacts on the system and baseline stream flow maintained in Lobos Creek.

Projects within the surrounding area would increase water consumption, but according to the city, not in excess of amounts expected and provided for in this area. In general, the projects represent replacement or renovation of existing facilities previously served by the city. New construction would be subject to current city of San

Francisco water conservation code requirements. Should the Presidio Trust enter into a water purchase agreement with the city to ensure adequate water supplies during peak demand periods, there would be no significant impact on regional water demand since the pending purchase agreement would essentially replace previous agreements held by both the U.S. Army and NPS with the city.

4.4.11.3 SCHOOLS

New housing units associated with this alternative are expected to contribute to a cumulative reduction of excess capacity in schools neighboring the Presidio. However, this impact is considered less than significant because SFUSD would be reimbursed through Impact Aid Program payments for pupils living at the Presidio. The increased intensity of residential use of the 1880 Lombard Street residential building would not be of a magnitude that would result in a significant increase in school enrollment.

4.4.11.4 HOUSING

This alternative and the other project listed in Table 9 would add 3,661 employees to the local economy. The new development within the 23-acre site accounts for 2,400 jobs, or 66 percent of this total. This growth in employment is estimated to require 705 new housing units (BAE 2000). The alternative proposes to add 450 housing units at the Letterman Complex. The listed projects include the provision of 1,331 new housing units (1,304 renovated units on the Presidio and 27 new units in the Marina District.) The housing demand resulting from the projects would be more than offset by the housing units added to the local supply, largely by reactivation of housing at the Presidio. Therefore, cumulative demand under this alternative would not contribute to employment-related housing demand increases in the surrounding neighborhood or city.

4.4.11.5 TRAFFIC AND TRANSPORTATION SYSTEMS

The traffic generated by the Alternative 4 land uses would contribute to the expected increases in cumulative traffic volumes on adjacent local and regional roadways. Alternative 4 would make up 32 percent of the total p.m. peak-hour traffic resulting from these cumulative projects, representing a greater contribution than other alternatives (Table 19). The combined cumulative projects, including Alternative 4, would generate increased traffic volumes throughout the Presidio. The cumulative projects would contribute 350 additional vehicles on Lincoln Boulevard during the p.m. peak hour, and Alternative 4 would make up about 18 percent of the additional traffic. Similar to Alternative 2, the cumulative increase in traffic would cause significant impacts at two of the study intersections. However, mitigation measures TR-2, *Lombard Street/Lyon Street Intersection Improvements*, and TR-3, *Lombard Street/Presidio Boulevard Intersection Improvements*, would improve the LOS at these intersections to acceptable levels (LOS D or better), as shown in Table 20.

The parking demand generated by the cumulative projects, including Alternative 4, is estimated to be 4,262 spaces, or about 40 spaces more than Alternative 2. Alternative 4 would comprise about 32 percent of the total cumulative parking demand within the Presidio and 27 percent of the total cumulative parking demand within the project impact zone (Table 21). The proposed parking supply within the 23-acre site in Alternative 4 would exceed the projected parking demand, as discussed in Section 4.4.7.3. The 8,390 parking spaces to be provided within the Presidio (as described in the 1994 GMPA) would be adequate for the expected cumulative parking demand within the Presidio. The parking impacts outside of the Presidio would be comparable to those described in Alternative 2.

The alternative's contribution to cumulative growth would have a minor cumulative effect on local and regional traffic growth and related congestion, and would be similar to Alternative 2.

4.4.11.6 CULTURAL RESOURCES

Under this alternative, LAMC and LAIR would be removed and replacement construction of 900,000 square feet would be built. In contrast to the current centralized building layout of LAMC and LAIR, replacement buildings would be lower in height, distributed across the 23 acres, and would complement historic patterns of development found elsewhere around the complex. The Planning Guidelines, finalized under this EIS, and Design Guidelines for new construction would be applied to new construction to achieve a contextual and compatible approach to architecture and site planning within the historic setting. However, replacement construction on the 23-acre site would not allow for the construction of new infill buildings within the adjacent historic hospital complex as recommended in the GMPA. Therefore, this alternative would not contribute to cumulative beneficial effects on the National Historic Landmark district.

4.4.11.7 AIR QUALITY

Proposed development under Alternative 4 and the projects identified in Table 9 would contribute to a cumulative increase in vehicle trips on the region's roadways and would contribute to cumulative increases in regional emissions. The cumulative operational emissions would cause localized impacts at congested intersections in the vicinity of the projects, but the resulting impacts would not be expected to cause local violations of ambient air quality standards. Expected cumulative increases in vehicle trips would also result in increases to region-wide emissions of ozone precursors (including NO_x and ROGs) and CO. With the exception of NO_x, the proposed development would cause emissions of ozone precursors that fall below the thresholds set forth in federal regulations for conformity determinations (as shown in Table 22). Because emissions of ozone precursors would be less than the applicability thresholds, a conformity determination is not necessary for ozone. Emissions of CO that would be caused by the cumulative scenario under Alternative 4 are accounted for in the current maintenance plan for CO, as discussed in Section 5.4.2. Because the projects are in conformance with regional air quality plans, no further conformity analysis is necessary, and no significant cumulative impacts would occur.

4.4.11.8 NOISE

Demolition and construction activities under Alternative 4, in combination with the project to reconstruct Doyle Drive, would cause short-term cumulative noise impacts if the two projects were to be under construction at the same time. Long-term cumulative impacts around the Letterman Complex would primarily result from increased traffic on Doyle Drive (U.S. Highway 101). The long-term cumulative effect of Alternative 4 and other projects within the Presidio and nearby portions of San Francisco would be increased traffic noise on most of the roads internal and external to the Presidio.

Because the surroundings are dominated by traffic noise in the existing conditions, approximately two-fold increases in traffic would have to result from cumulative development in order to cause increases in traffic noise that would be noticeable to most people. Cumulative development with Alternative 4 would cause peak-hour traffic increases along Lombard Street, inside the Presidio, that could result in noticeable noise increases, but no noise sensitive receptors are located along this segment. None of the roadway segments near noise sensitive receptors would experience greater than two-fold peak-hour traffic increases. The conclusion in the GMPA

Final EIS that long-term cumulative traffic-induced noise levels would increase due to increases in vehicle volumes remains applicable; however, the increases near sensitive receptors would not be considered significant. No significant cumulative noise impacts are expected.

4.4.12 Unavoidable Adverse Effects

The following impacts are identified as potentially significant and for which there are no mitigating measures or would not be mitigated to a level of insignificance.

Cultural Resources – To the extent new construction would not conform to the Planning Guideline recommendations, the following departures would have a potential adverse effect on cultural resources.

- Removal of LAMC and LAIR and replacement construction consistent with Planning and Design Guidelines would not allow for infill construction as recommended in the GMPA, which would have an adverse effect on the adjacent historic hospital complex.
- Removal of two historic tennis courts would have an adverse effect on these historic structures.
- Massing and bulk of the four office buildings on the western edge of the site would not be in scale with the adjacent historic structures, resulting in a potential adverse effect on the historic setting.
- Historic view corridors at Thornburg and Edie roads would be blocked by the proposed building layout resulting in an adverse visual impact.

Air Quality – The air quality modeling indicated that the level of NO_x emissions would be significant based on the BAAQMD's significance thresholds for NO_x of 80 pounds/day.

Noise – Short-term use of impact tools and demolition activities would be a source of increased noise to occupants and passive recreational users within the Letterman Complex. Mitigation measures proposed to reduce intrusions would reduce noise impacts but not to a level of insignificance to those users closest to (i.e., within 250 feet from) construction equipment.

4.4.13 Relationship of Short-Term Uses of the Environment and Maintenance and Enhancement of Long-Term Productivity

Use of the site for offices, residences, retail and other uses would preclude other long-term management possibilities for the Letterman Complex. These uses would occur within an intensively used area within the northern part of the Presidio, which would allow areas in the south and along the coast to remain more natural and experience less activity and development. Reinforcement of this overall use pattern would minimize impacts on the productivity of park resources.

Use of the site for offices, residences, retail and other uses would not affect any park ecosystem. Improvements to existing infrastructure would be considered sustainable actions that are expected to improve the operation of systems. Through implementation of the Planning Guidelines for new development, the Presidio Trust would

promote environmental protection and sustainable design and encourage technologies and practices that would reduce environmental impacts or produce environmental benefits in water conservation and reclamation, energy conservation, and transportation.

4.4.14 Irreversible or Irretrievable Commitments of Resources

The offices, residences, retail and other uses would be designed and constructed to minimize consumption of energy and development of non-renewable fuels. Renewable sources of energy and new developments in energy-efficient technology, including recycling of materials and waste, would be fully explored and implemented to the extent possible. Although new development could be restored to previous conditions over time, the use of land, construction materials, energy, and financial resources to implement the alternative would, in a practical sense, be an irretrievable commitment of resources.

Archeological resources would be avoided where possible and historic resources would be protected. Where this is not possible, disturbance would be mitigated through recovery of cultural information and significant artifacts.

4.5.1 Consistency with Approved Plans and Policies

4.5.1.1 GENERAL OBJECTIVES OF THE GMPA AND PURPOSES OF GGNRA ACT

Alternative 5 is consistent with the General Objectives of the GMPA, which are identified in Section 1.1.5 of this document. Foremost, it is consistent with the GMPA's General Objective of economically and physically sustaining the Presidio indefinitely through the development team's organizational and financial capabilities to undertake capital investments, operate programs, and make contributions of services or amenities to help preserve the park's unique historic and natural qualities. This alternative is consistent with meeting the Trust Act's financial self-sufficiency mandate and the requirement that the Trust give priority to tenants that enhance the financial viability of the Presidio.

Removal of both the LAMC and LAIR buildings, modern structures that block view corridors and are architecturally non-distinctive but which clash with their surroundings, would be consistent with the GMPA's General Objective to enhance the scenic resources of the Presidio. Removal of both the LAMC and LAIR buildings would also contribute to the General Objective of enhancing the Presidio's cultural resources by assisting in rehabilitating historic settings to permit an understanding of the site's significance to the National Historic Landmark district. In furtherance of this General Objective, design and siting of new construction would promote the enhancement and rehabilitation of scenic vistas, including views to the Palace of Fine Arts. New construction to replace the monolithic and architecturally non-distinctive buildings with those better tailored to the mass, scale, color, and materials of other structures in the Letterman Complex and the Presidio would be in keeping with preservation of the character and integrity of the National Historic Landmark district. Consistent with the General Objective to provide for uses that involve stewardship and sustainability, replacement construction would promote principles of sustainable design and technology. Furthering this General Objective, hand-dismantling and salvaging of materials prior to building demolition and conservation and recycling strategies to be employed within the buildings and by tenants would promote and demonstrate conservation practices, including waste reduction and recycling.

Alternative 5 is consistent with the General Objective to provide for appropriate uses of the Presidio. An Internet-based tenant applying advanced digital arts and technologies to on-line communications offers enhancement of use involving the arts, innovation, and communication. A company developing interactive educational software and a non-profit foundation devoted to promoting innovative efforts to improve education fosters educational and innovation objectives. Furthermore, companies developing cutting-edge technologies in the digital and interactive arts and sciences offer a use oriented toward the arts and research. The mix of offerings in Alternative 5 would assist in making the Presidio a center for research and learning by enlivening the park with a program of national and international distinction serving a national and international audience.

The alternative is consistent with the other GMPA General Objectives. Activities, seminar programs, and educational initiatives would be in keeping with the GMPA's General Objective to provide for uses that involve cross-cultural and international dialogue. The 7-acre Great Lawn or public park would further the GMPA's General Objective to increase open space, and the design of the proposed cisterns and lagoon to reduce

stormwater runoff would be consistent with the GMPA's General Objective of meeting tenant and resident needs while minimizing impacts on neighboring communities.

Alternative 5 is consistent with the purposes of the GGNRA Act, which are identified in Section 1.1.5 of this document. Primarily by focusing more intensive use into an area that has been previously developed, Alternative 5 preserves the recreation area as far as possible in its natural setting. New construction would be subject to sound land use planning, including implementation of the Planning Guidelines and design review, so that it would not degrade scenic views and the natural setting.

4.5.1.2 PRESIDIO GENERAL MANAGEMENT PLAN AMENDMENT

This alternative is also consistent with a number of the more specific goals and planning principles of the GMPA. This alternative would foster the GMPA's proposed major directions for the future of the Presidio by perpetuating the site as a building and activity core, retaining and using the site for research purposes by a single institutional user devoted to innovative research and technology development. It also fosters using the facilities for visiting researchers and other special program participants. New construction would replace the LAMC as permitted under the GMPA since the LAMC would not meet essential program and management needs. Provision of limited retail facilities and services, including the day-care facility, fitness center, general store, cafeteria, and cafes, would reinforce the GMPA's neighborhood concept. The 7-acre Great Lawn or public park would further the GMPA's specific goal to provide for safe and enjoyable recreational use of the Presidio. The design of the proposed cisterns and lagoon to reduce storm-water runoff would further the GMPA's specific goals of managing onsite water resources and making the Presidio an environmental model.

In certain respects, Alternative 5 does not match the GMPA's site-specific plan. This alternative would not promote the GMPA concept for infill construction within the complex but would focus replacement construction within a 23-acre site. Because replacement construction would occur within only a portion of the potential sites that were identified on a preliminary basis as referenced in the GMPA (i.e., outside the historic hospital complex), the alternative would not reinforce the historic hospital complex's courtyard as encouraged by the GMPA. Whereas the GMPA assumed rehabilitation and reuse of LAIR, demolition of the LAIR and other existing buildings that have been demolished or are designated for demolition so as to allow new replacement construction would also increase the total amount of gross square feet of replacement construction within the complex as envisioned in the GMPA from 503,000 to approximately 900,000 square feet. Nevertheless, the GMPA's key restrictions on maximum allowable square footage for the complex (1.3 million square feet) and maximum allowable height of new construction (60 feet) would not be exceeded by this alternative. Furthermore, replacement construction would proceed in accordance with the Planning Guidelines (provided in Appendix B) and design review as recommended within the GMPA to ensure that new construction would be compatible with the adjacent historic buildings and patterns of development.

Although this alternative would not implement the specific proposal in the GMPA for the Letterman Complex to serve as a science and education center devoted to issues of health, life and earth sciences, to date no suitable tenant has been identified for the site that would adhere to the GMPA's specific proposal. This potential land use conflict, therefore, cannot be resolved. However, mitigation measures identified in Section 4.7 would be implemented to lessen any adverse environmental impacts of this alternative.

4.5.1.3 SAN FRANCISCO GENERAL PLAN

While the Presidio is not subject to the General Plan, this alternative would be consistent with General Plan policies regarding the location of institutional facilities in areas occupied by or reserved for large groups of buildings of a public or a semi-public nature. However, it may not be consistent with the policy to restrict business activities of city-wide importance to districts devoted to and designated for business services.

4.5.2 Solid Waste

4.5.2.1 DISPOSAL OF DEMOLITION DEBRIS OFF SITE

Due to the demolition of both the LAMC and LAIR buildings as proposed under this alternative, Alternative 5 would generate 80,000 tons of construction debris. This represents 44,600 (55 percent) more tons of debris than Alternative 1. The impacts of this alternative on solid waste sites located in the Bay Area are described under Alternative 2.

4.5.3 Water Supply and Distribution

4.5.3.1 IMPACTS OF WATER CONSUMPTION ON BASELINE

Alternative 5 would demand approximately 85,000 gpd of water (Tables 12 and 13). This figure assumes the use of 8,197 gpd of storm water captured onsite for a portion of the landscape irrigation and the proposed lagoon. Since the estimated water consumption of this alternative is below the 89,000 gpd threshold established for the site, Alternative 5 is not expected to have a negative effect on the Presidio water supply. Nevertheless, the development team should adopt water conservation measures implemented by the Presidio Trust and described in mitigation measure WS-2, *Water Supply- and Demand-Side Solutions to Reduce Cumulative Impacts* to further reduce water consumption.

4.5.3.2 IMPACTS ON FIRE FLOWS

Improvements to the water distribution system may be required to ensure adequate fire flow to new development with the Letterman Complex to meet the Uniform Fire Code, depending on the characteristics of buildings to be constructed (see mitigation measure WS-1, *Fire Flows*).

4.5.4 Schools

4.5.4.1 IMPACT ON CAPACITY AT EXISTING OR NEW SCHOOL SITES

The impact of this alternative on SFUSD schools would be the same as Alternative 1 (Table 14). At full occupancy, Alternative 5 would generate 92 schoolchildren between the ages of 5 and 18 who would enroll in SFUSD schools. This level of enrollment is within the existing capacity of SFUSD. Therefore, Alternative 5 would not result in an adverse impact on SFUSD schools.

4.5.5 Housing

4.5.5.1 INCREASE IN HOUSING DEMAND

At buildout, the additional regional housing demand created by employment associated with Alternative 5 from outside of the Bay Area would be 481 housing units (Table 15). The Presidio housing stock would accommodate about 55 percent of this housing demand. Thus, the new demand on regional housing due to implementation of the alternative would be 216 units. This represents less than 0.5 percent of the estimated new housing construction between 2000 and 2010 (ABAG 1998), and less than 1 percent of the currently vacant units in the Bay Area (California Department of Finance 1998). Distributed by sub-region in the Bay Area, this new demand would be 119 units in San Francisco, 43 units in the East Bay, 37 units in the North Bay and 17 units on the Peninsula. The potential new housing demand created by employment associated with this alternative would not have a significant effect on the regional housing market since it represents an insignificant percentage (less than 1 percent) of the total number of vacant housing units.

This alternative would incrementally contribute to the Presidio housing demand, which represents a small portion of the employment-related housing demand increases in San Francisco and the Bay Area. However, given the short supply of affordable housing in the city, there would be an adverse impact from any unmet affordable housing demand. To limit the demand for affordable units in San Francisco, the Presidio Trust offers reduced rental rates to Presidio employee and tenant households with gross household incomes of less than $45,000. As Presidio buildings are reoccupied and park programs and activities are established, the need for additional onsite housing, including affordable housing, would be analyzed based on actual employment patterns and related housing demands associated with building uses.

4.5.6 Medical Research

4.5.6.1 IMPACT ON MEDICAL RESEARCH

Implementation of this alternative would preclude the use of the site from medical and life science research. The impact of not providing medical research space at the site is discussed in Alternative 3.

4.5.7 Traffic and Transportation Systems

Under Alternative 5, there would be no vehicular roadway network within the 23-acre site, but merely access to underground parking facilities. Improvements to the intersection(s) of Lyon Street/Richardson Avenue/Gorgas Avenue would allow for left turns into the site from westbound Richardson Avenue. The Gorgas Avenue Gate would be the primary entrance, with the Lombard Street Gate serving as a secondary entrance. Alternative 5 would also include improvements to the pedestrian network within the site, as well as improved connections to adjacent areas. Alternative 5 assumes a total of 1,530 parking spaces within the site, of which 1,500 spaces would be below-grade, while 30 spaces would be provided on surface lots.

4.5.7.1 ADDITIONAL TRAFFIC VOLUMES

Alternative 5 would generate 4,360 external (i.e., to areas outside the Presidio) weekday daily vehicle-trips and 400 vehicle-trips during the p.m. peak hour into and out of the Presidio (Table 16). Because the trips generated by the office uses would be primarily comprised of employee trips, only 90 of the 400 p.m. peak-hour vehicle-trips generated by Alternative 5 would be inbound and 310 would be leaving the site (Table D-9 in Appendix D).

Between existing and 2010 conditions, the Mason Street Gate would experience an increase of 350 vehicles during the p.m. peak hour, with project-related traffic comprising 12 percent of this increase. Alternative 5 would contribute the majority of the traffic volume increase at Gorgas Avenue Gate. Traffic volumes at this gate would increase by 470 vehicles during the p.m. peak hour, with project-generated traffic comprising 55 percent of this growth. The existing p.m. peak-hour traffic volumes at the Lombard Street Gate would be increased by 390 vehicles; 10 percent of this increase would be due to the project. The existing p.m. peak-hour traffic volumes at the Presidio Boulevard Gate would increase by 210 vehicles; 29 percent of this increase would be due to the project (Table 17).

4.5.7.2 IMPACTS ON INTERSECTION OPERATING CONDITIONS

Currently, during the p.m. peak hour, two of the study intersections operate at LOS C, four intersections operate at LOS B, and one intersection operates at LOS A (Table 4). Under Alternative 5, three of the study intersections (Presidio Boulevard/Letterman Drive/Lincoln Boulevard, Mason Street/Marina Boulevard/Lyon Street, and Doyle Drive/Marina Boulevard/Lyon Street) would operate acceptably at LOS C during the p.m. peak hour (Table 18). The intersections of Lombard Street/Lyon Street and Presidio Boulevard/Lombard Street would fail under Alternative 5 (Table 18). The intersections of Lombard Street/Lyon Street and Presidio Boulevard/Lombard Street would fail, operating at LOS F and LOS E, respectively. Recommended improvements described in mitigation measures TR-2, *Lombard Street/Lyon Street Intersection Improvements*, and TR-3, *Lombard Street/Presidio Boulevard Intersection Improvements*, in Section 4.6.6, and illustrated in Figures 16 and 17, would improve the operating conditions at the intersection of Lombard Street/Lyon Street from LOS F to LOS B and at the intersection of Presidio Boulevard/Lombard Street from LOS E to LOS C.

4.5.7.3 INCREASED PARKING DEMAND AS A RESULT OF PROJECT-RELATED TRIPS

Alternative 5 assumes a parking supply of 1,530 parking spaces. The parking demand of 1,440 spaces would primarily consist of long-term employee parking (1,260 parking spaces) and some short-term visitor spaces (180 parking spaces). The parking demand of 1,440 spaces would be accommodated within the proposed supply of 1,530 spaces. Therefore, there would be no significant impact on parking in Area A and adjacent neighborhoods. As shown on Table D-11 in Appendix D, weekend parking demand would be only 50 percent of weekday demand; therefore, substantial parking would be available for recreational uses on weekends.

4.5.7.4 IMPACTS ON PEDESTRIAN AND BICYCLE FACILITIES

Development of the land uses proposed in Alternative 5 would increase pedestrian and bicycle activity within and in the vicinity of the Letterman Complex. During the p.m. peak hour, the project would result in an increase of about 160 new pedestrian and bicycle trips. These new trips would be accommodated within the

existing pedestrian and bicycle network. In addition, planned improvements would enhance the pedestrian and bicycle environment, and facilitate the safe and direct travel of pedestrians and bicyclists to and from the site.

The impacts associated with improvements at the Lyon Street/Richardson Avenue/Gorgas Avenue intersection (mitigation measure TR-1) on the citywide bicycle network are described under Alternative 1. Relocating a portion of the city's bicycle route 4 as discussed in mitigation measure TR-6 would reestablish this connection.

Implementation of recommended vehicular capacity improvements at the Lombard Street Gate may require adjustment of routes and physical improvements to facilitate access for bicycles currently entering the Presidio via the city's bike route 4 (relocated to Chestnut Street, see mitigation measure TR-6) and bike route 6 (Greenwich Street). The current Presidio Trails and Bikeways Study will consider alternatives to the current access on Lombard Street to include widening the current pedestrian walkway at the Lombard Street Gate, re-establishing the historic opening of the Presidio perimeter wall at Greenwich Street (subject to additional environmental review, including Section 106 compliance), relocating bike route 4 to Gorgas Avenue or creating an expanded bicycle and pedestrian path from the Lombard Street Gate (see Figure 18).

4.5.7.5 INCREASED DEMAND FOR PUBLIC TRANSPORTATION

The 120 p.m. peak-hour transit trips generated by Alternative 5 would be accommodated on the six existing MUNI bus lines that currently serve the Presidio. Planned improvements to transit service to the Presidio, including a peak period express bus service and more frequent service on MUNI's 29-Sunset line, would also serve to accommodate the increase in transit demand.

The average passenger load on Golden Gate Transit transbay buses during the a.m. and p.m. peak hours is about 30 passengers per bus, and there are about 120 buses per hour during the a.m. peak hour and about 110 buses per hour during the p.m. peak hour for about 23 different transbay routes (Golden Gate Bridge, Highway and Transportation District 1997). Alternative 5 would generate 17 transit trips to the North Bay in the p.m. peak hour. If these project-generated passengers were distributed across the 23 Golden Gate Transit routes proportionally to the existing distribution of passengers across routes, the project would add a maximum of two passengers to each route. Even if all of the passengers added to a single route were on the same bus, the estimated passenger load would not exceed the bus capacity for any one line.

4.5.7.6 IMPACTS OF TRANSPORTATION DEMAND MANAGEMENT MEASURES

In addition to the TDM plan elements described under Alternative 1, the following TDM measures were developed as part of Alternative 5 to encourage non-automobile modes and minimize parking demand:

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

Alternative 5 TDM elements include strategies that the proponent has successfully utilized in TDM programs at their current worksites to exceed trip reduction requirements. The project proponent's overall TDM concept relies on providing a comprehensive set of positive rewards (incentives). These TDM measures would encourage transit, rideshare, pedestrian and bicycle travel by employees through the provision of onsite facilities, staff support and the guaranteed-ride-home program. Flextime and guaranteed-ride-home programs would allow employees to adjust their work schedules as necessary. Preferential parking would encourage the use of carpools and vanpools, which would reduce the number of vehicle trips to the site, as well as reduce parking demand. Telecommuting and onsite amenities such as restaurants, retail and day-care facilities would reduce the number of trips that would leave the site.

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

A TDM program, as discussed in mitigation measure TR-8, would establish specific performance criteria and a monitoring and reporting process. Following annual monitoring, TDM strategies that are found to be ineffective or underutilized would be improved or replaced with other strategies.

4.5.7.7 CONSTRUCTION IMPACTS

The impacts associated with additional construction-related traffic on the local and regional traffic network are described under Alternative 1. A construction traffic management plan, as discussed in mitigation measure TR-5, would be developed to provide specific routes and other mitigation measures to minimize traffic impacts.

4.5.8 Cultural Resources

4.5.8.1 EFFECT OF REMOVING LAMC/LAIR AND ADDING NEW CONSTRUCTION

Under this alternative, LAMC and LAIR would be removed and replacement construction of 900,000 square feet would be built. In contrast to the current centralized building layout of LAMC and LAIR, replacement buildings would be lower in height, distributed across the 23 acres, and would complement historic patterns of development found elsewhere around the complex. The Planning Guidelines, finalized under this EIS, and Design Guidelines for new construction would be applied to new construction to achieve a contextual and compatible approach to architecture and site planning within the historic setting. However, replacement construction on the 23-acre site would foreclose the opportunity for the construction of new infill buildings within the adjacent historic hospital complex as recommended in the GMPA. Therefore, this alternative would

preclude enhancing the campus-like setting of the historic landscape and unifying the disjointed remnant historic building cluster. This would constitute an adverse effect on the adjacent historic hospital complex.

Building Massing and Scale – The buildings' 60-foot and 45-foot height restrictions and their massing would be compatible with the historic setting and in accordance with the Planning Guidelines. New construction would consist of narrow rectilinear bar buildings, arranged in parallel rows connected by lower-height linking pieces in keeping with the configuration of the adjacent historic hospital ward buildings linked by glass-enclosed breezeways. The new buildings would be three- and four-stories high with gabled roofs and glazed circulation elements that would be based on character-defining elements of historic buildings found elsewhere within the complex and throughout the Presidio. However, the length and mass of the interconnected buildings would be incompatible in scale with and would isolate the 23-acre site from the adjacent historic hospital complex. Changes to the western edge of the 23-acre site would be considered during design review to modulate and make this edge more permeable, and thereby break up the solidity of the building massing.

O'Reilly Greensward – The siting of new buildings close to O'Reilly Avenue would not follow the Planning Guidelines' recommendation for a greensward along O'Reilly Avenue. These actions would create an adverse effect on the adjacent historic structures. Attention would be given to refining this edge of the site during design review to avoid this adverse effect and make the site design more consistent with the Planning Guidelines' objectives.

Gorgas – The public café and public park would be consistent with active and public activities for the Gorgas edge recommended in the Planning Guidelines.

Site Circulation – The pedestrian promenade beginning at the new Chestnut Street Gate which leads into the center of the 23-acre site would not continue through to O'Reilly Avenue as recommended in the Planning Guidelines. Similarly, potential connections from Torney Avenue or Edie Road would be blocked by the proposed building layout. Modifications to these areas to improve connectivity between the 23-acre site and the adjacent historic hospital complex would be encouraged during design review in accordance with the Planning Guidelines.

4.5.8.2 BENEFICIAL EFFECT ON EXTANT CULTURAL LANDSCAPE FEATURES

Actions associated within this alternative would have a beneficial effect on the cultural landscape and the National Historic Landmark district as described under Alternative 2.

4.5.8.3 ADVERSE EFFECT DUE TO REMOVAL OF TENNIS COURT (STRUCTURE 1147)

The effect of removal and replacement of this structure is discussed under Alternative 2.

4.5.8.4 EFFECT ON THE PRESIDIO WALL

The effect of the proposed re-introduction of a pedestrian entrance through the Presidio wall along Lyon Street at the Chestnut Street intersection is discussed under Alternative 2.

4.5.8.5 EFFECT OF INTERSECTION AND ROADWAY IMPROVEMENTS

The effect of intersection improvements would be similar to that described under Alternative 2. However, under this alternative, Letterman Drive would not be removed and Torney Avenue would not be extended. This alternative would not include a new road network within the 23-acre site, but instead would provide direct vehicular access from Gorgas Avenue and Letterman Drive into an underground parking garage. A short drive, parallel to Letterman Drive, would be established for visitor drop-off, short-term parking, and underground parking. These improvements would not have an adverse effect on the historic circulation network.

4.5.8.6 VISUAL IMPACTS

This alternative, with the removal of LAMC and LAIR, the large paved parking area that occupies the eastern half of the 23-acre site, and the introduction of lower-scaled new construction would enhance the visual integrity of the Letterman Complex. The removal of the 10-story LAMC building, which contrasts sharply with its surroundings, and replacement with new construction limited to 60 feet in height, would substantially improve the views from many vantage points within the Presidio. Replacement construction would be of a visual scale more appropriate to the surrounding areas. Pavement would be removed within the area now dominated by parking and replaced with new landscaping and a public park that would create visual order and provide viewing opportunities of the Palace of Fine Arts (refer to Figure 24). Views into the 23-acre site from Lyon Street would be screened by the existing windrow.

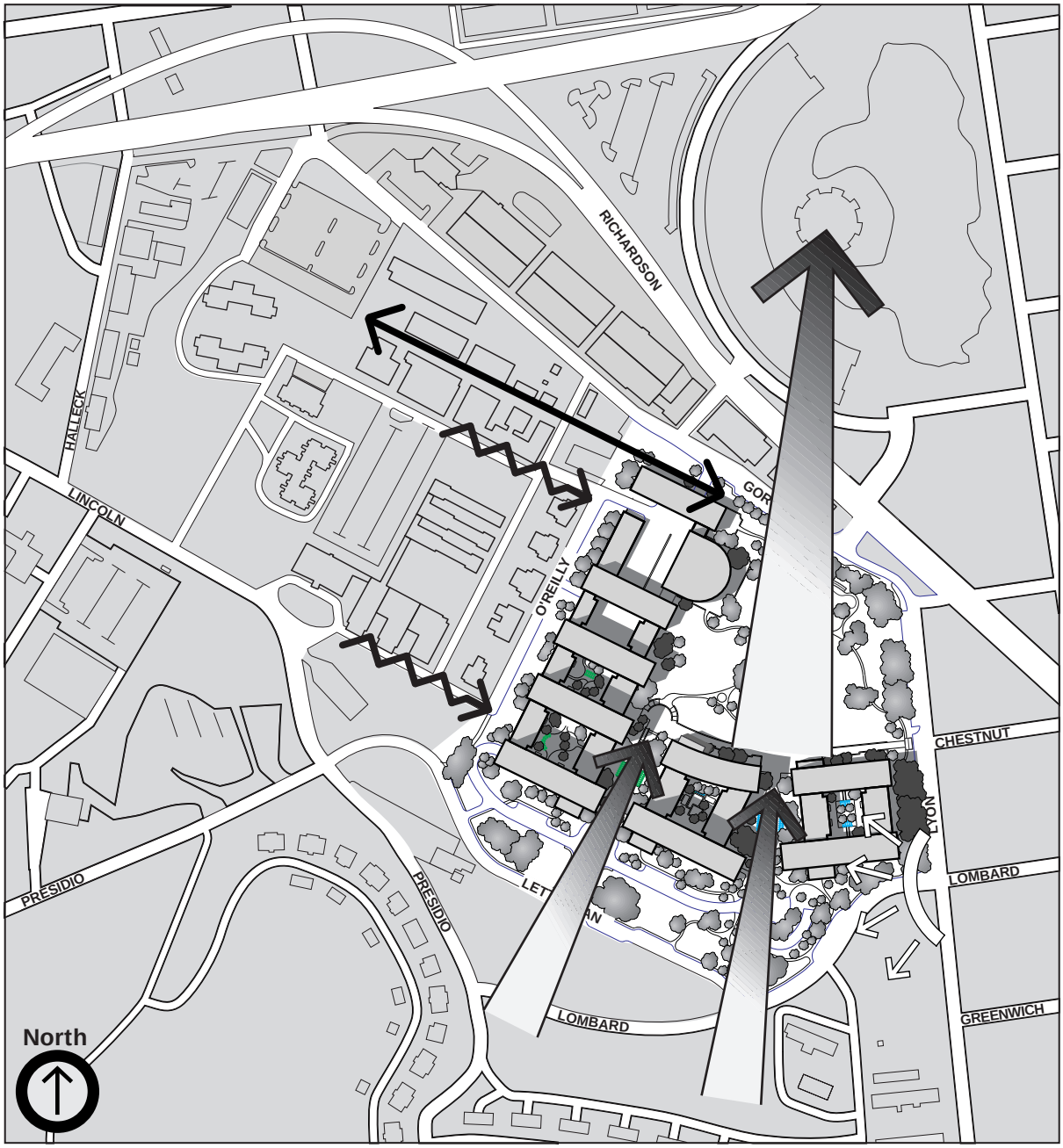
The siting of buildings near Lombard Street Gate would alter the visual setting at this important entry point. New construction would reinforce the historic pattern of development for the Letterman Complex, which included buildings very close to the Lombard Street Gate. Sufficient vegetative screening and building setbacks would be provided to minimize these impacts on entry views. Views from Lombard Street Gate toward the 23-acre site would produce a new sense of arrival into the Presidio similar to the historic pattern of buildings at this edge.

This alternative would enhance north-facing views into the center of the site and to the Palace of Fine Arts. It would also maintain the historic view corridor at Thornburg Road. However, the historic view corridor at Torney Avenue (which is currently blocked) would not be preserved. In addition, the existing historic view corridor at Edie Road would not be maintained, which would have a negative effect on the visual quality of the site. Modifications would be made during design review to improve viewing opportunities along this corridor.

4.5.8.7 EFFECT ON VISITOR EXPERIENCE

This alternative would have a beneficial effect on the visitor experience. The 7-acre Great Lawn would be a key public amenity in a campus-like setting that would include a water feature, promenade, café, and coffee bar. Replacement construction would provide opportunities for public programs such as a museum for visual arts, a visual effects archive, training in the field of digital arts, and screening/meeting rooms for community use.

The Digital Arts Center would build upon the Presidio interpretive theme of innovative technology by demonstrating advances in technologies related to the arts and entertainment. This center would be one of many areas throughout the Presidio which would “tell the story” of the Presidio in support of the five interpretive themes identified in the GMPA. There would be an overall beneficial effect on the visitor experience through



Key Scenic Views and View Corridors

Historic View Corridors

Obstructed Views

Views from Entry Point

Figure 24. Visual Impacts of Alternative 5

actions such as the rehabilitation of building 558 as a visitor information center, the introduction of three information/orientation kiosks, the incorporation of interpretive information about the complex in public lobby spaces, and interpretive displays incorporated into the landscape at key spots. These improvements would increase public access and visitor opportunities considerably over what exists today for visitors.

4.5.8.8 EFFECT ON ARCHEOLOGICAL PROPERTIES

As discussed in Alternative 2, ground-disturbing activities would have the likelihood of encountering archeological resources. An Archeological Management Assessment and Monitoring Program (described in Appendix F) would be employed to discover, document, protect, and manage the archeological record at the Letterman Complex. As a result of these practices, the adverse effects on archeological properties would be mitigated.

4.5.9 Air Quality

4.5.9.1 SHORT-TERM DEMOLITION/CONSTRUCTION IMPACTS

The impacts during demolition of buildings and replacement construction at the 23-acre site would be similar to those shown under Alternative 2. Compliance with the applicable requirements for asbestos control and incorporation of mitigation measures AQ-1, *BAAQMD Control Measures* and AQ-2, *Demolition of Existing Buildings* into the alternative would reduce the effects of demolition and construction activities to a less-than-significant level.

4.5.9.2 LONG-TERM REGIONAL OPERATION IMPACTS

Alternative 5 would result in an increase of up to approximately 4,910 internal and external vehicle trips per day. Based on URBEMIS7G modeling results, increased vehicle trips associated with the alternative would generate approximately 47 lb/day of ROG, 74 lb/day of NO_x, 32 lb/day of PM_{10} and 556 lb/day of CO. These emission rates are summarized in Table 22. Alternative 5 would not result in regional operational emissions exceeding any of the BAAQMD's significance thresholds for ROG, NO_x, or PM_{10}.

Similar to the impacts under Alternative 1, direct and indirect emissions from the use of electricity and natural gas due to Alternative 5 would not be significant when compared to the emissions caused by project-related traffic, and the alternative would not have the potential to expose nearby receptors to toxic air contaminants.

4.5.9.3 LONG-TERM LOCAL OPERATIONS IMPACTS

Localized CO impacts due to project traffic are described under Alternative 1. Because Alternative 5 2010 traffic would cause fewer than 1,680 vehicles in the p.m. peak hour through the Lombard Street Gate, the localized CO concentrations for Alternative 5 would be less than 7.9 ppm on a 1-hour basis and less than 5.4 ppm on an 8-hour basis. These localized CO concentrations would not exceed the state ambient air quality standards for CO.

4.5.10 Noise

4.5.10.1 SHORT-TERM DEMOLITION/CONSTRUCTION NOISE IMPACTS

The impacts during demolition and replacement construction within the Letterman Complex would be similar to those described under Alternative 2.

4.5.10.2 LONG-TERM TRAFFIC NOISE INCREASES

The impacts of traffic noise caused by Alternative 5 would be similar to those described under Alternative 1. Traffic volumes for Alternative 5, including peak traffic volumes for Gorgas Avenue, would be less than those shown for Alternative 1, and the associated noise level increases would be subsequently lower. As such, the traffic noise increases associated with Alternative 5 would not cause a significant impact.

4.5.10.3 LONG-TERM STATIONARY SOURCE NOISE IMPACTS

The impacts of stationary sources of noise associated with Alternative 5 would be similar to those shown under Alternative 1. No significant long-term stationary source noise impacts are expected.

4.5.11 Cumulative Impacts

4.5.11.1 SOLID WASTE

Cumulative impacts due to the disposal of demolition debris under this alternative would be the same as Alternative 2.

4.5.11.2 WATER SUPPLY

The Lobos Creek watershed would be insufficient to supply the in-stream flow requirement necessary to maintain natural streambed characteristics and meet peak Presidio daily demands of 1.68 mgd with this alternative and the other projects listed in Table 9 that are within the Presidio (BAE 1998a). Alternative 5 and the other identified projects within the Presidio would contribute to a net cumulative peak shortfall of approximately 286,000 gpd on the Presidio-wide water supply due to excess demand (BAE 2000). However, water supply- and demand-side measures and instream flow monitoring described in mitigation measures WS-2, *Water Supply- and Demand-Side Solutions to Reduce Cumulative Impacts*, WS-3, *Instream Flow Monitoring to Reduce Cumulative Impacts*, and WT-1, *Water Reclamation Plant to Reduce Cumulative Impacts*, would result in a water savings of approximately 320,000 gpd, which would minimize cumulative impacts on the system and baseline stream flow maintained in Lobos Creek.

Projects within the surrounding area would increase water consumption, but according to the city, not in excess of amounts expected and provided for in this area. In general, the projects represent replacement or renovation of existing facilities previously served by the city. New construction would be subject to current city of San Francisco water conservation code requirements. Should the Presidio Trust enter into a water purchase agreement with the city to ensure adequate water supplies during peak demand periods, there would be no significant impact on regional water demand since the pending purchase agreement would essentially replace previous agreements held by both the U.S. Army and NPS with the city.

4.5.11.3 SCHOOLS

The cumulative impacts to SFUSD resulting from this alternative would be similar to Alternative 1.

4.5.11.4 HOUSING

This alternative and the other projects listed in Table 9 would add 3,761 employees to the local economy. The new development within the 23-acre site accounts for 2,500 jobs, or 66 percent of this total. This growth in employment is estimated to require 724 new housing units (BAE 2000). The listed projects include provision of 1,331 new housing units (1,304 renovated units on the Presidio and 27 new units in the Marina District.) The housing demand resulting from the projects would be more than offset by the housing units added to the local supply, largely by reactivation of housing at the Presidio. Therefore, cumulative demand under this alternative would not contribute to employment-related housing demand increases in the surrounding neighborhood or city.

4.5.11.5 TRAFFIC AND TRANSPORTATION SYSTEMS

The traffic generated by the land uses under this alternative would contribute to the expected increases in cumulative traffic volumes on adjacent local and regional roadways. Alternative 5 would contribute 23 percent of the total p.m. peak-hour traffic resulting from these cumulative projects (Table 19). The combined cumulative projects, including Alternative 5, would generate increased traffic volumes throughout the Presidio. The cumulative projects would contribute 320 additional vehicles on Lincoln Boulevard during the p.m. peak hour, and Alternative 5 would make up about 12 percent of the additional traffic. Cumulative conditions with Alternative 5 land uses would result in only the intersection of Lyon Street and Lombard Street experiencing poor operating conditions. The operating conditions at this intersection could be improved to acceptable levels with the implementation of mitigation measure TR-2 (Table 20).

The parking demand generated by the cumulative projects, including Alternative 5, is estimated to be 4,552 spaces, or about 330 spaces more than Alternative 2. Alternative 5 would comprise about 37 percent of the total cumulative parking demand within the Presidio and 32 percent of the total cumulative parking demand within the project impact zone (Table 21). The proposed parking supply within the 23-acre site in Alternative 5 would exceed the projected parking demand, as discussed in Section 4.5.7.3. The 8,390-space parking supply within the Presidio (as described in the 1994 GMPA) would be able to accommodate the expected cumulative parking demand within the Presidio. The parking impacts outside of the Presidio would be comparable to those described in Alternative 2.

The alternative's contribution to cumulative growth would have a minor cumulative effect on local and regional traffic growth and related congestion, and would be similar to Alternative 2.

4.5.11.6 CULTURAL RESOURCES

Under this alternative, LAMC and LAIR would be removed and replacement construction of 900,000 square feet would be built. In contrast to the current centralized building layout of LAMC and LAIR, replacement buildings would be lower in height, distributed across the 23 acres, and would complement historic patterns of development found elsewhere around the complex. The Planning Guidelines, finalized under this EIS, and Design Guidelines for new construction would be applied to new construction to achieve a contextual and compatible approach to architecture and site planning within the historic setting. However, replacement construction on the 23-acre site would not allow for the construction of new infill buildings within the adjacent

historic hospital complex as recommended in the GMPA. Therefore, this alternative would not contribute to cumulative beneficial effects on the National Historic Landmark district.

4.5.11.7 AIR QUALITY

Proposed development under Alternative 5 and the projects identified in Table 9 would contribute to a cumulative increase in vehicle trips on the region's roadways and would contribute to cumulative increases in regional emissions. The cumulative operational emissions would cause localized impacts at congested intersections in the vicinity of the projects, but the resulting impacts would not be expected to cause local violations of ambient air quality standards. Anticipated cumulative increases in vehicle trips would also result in increases to region-wide emissions of ozone precursors (including NO_x and ROGs) and CO. The proposed development would cause emissions of ozone precursors that fall below the thresholds set forth in federal regulations for conformity determinations (as shown in Table 22). Because emissions of ozone precursors would be less than the applicability thresholds, a conformity determination is not necessary for ozone. Emissions of CO that would be caused by the cumulative scenario under Alternative 5 are accounted for in the current maintenance plan for CO, as discussed in Section 5.4.2. Because the projects are in conformance with regional air quality plans, no further conformity analysis is necessary, and no significant cumulative impacts would occur.

4.5.11.8 NOISE

Demolition and construction activities under Alternative 5, in combination with the project to reconstruct Doyle Drive, would cause short-term cumulative noise impacts if the two projects were to be under construction at the same time. Long-term cumulative impacts around the Letterman Complex would primarily result from increased traffic on Doyle Drive (U.S. Highway 101). The long-term cumulative effect of Alternative 5 and other projects within the Presidio and nearby portions of San Francisco would be increased traffic noise on most of the roads internal and external to the Presidio.

Because the surroundings are dominated by traffic noise in the existing conditions, approximately two-fold increases in traffic would have to result from cumulative development in order to cause increases in traffic noise that would be noticeable to most people. Cumulative development with Alternative 5 would cause peak-hour traffic increases along Lombard Street, inside the Presidio, that could result in noticeable noise increases, but no noise-sensitive receptors are located along this segment. None of the roadway segments near noise-sensitive receptors would experience greater than two-fold peak-hour traffic increases. The conclusion in the GMPA Final EIS that long-term cumulative traffic-induced noise levels would increase due to increases in vehicle volumes remains applicable; however, the increases near sensitive receptors would not be considered significant. No significant cumulative noise impacts are expected.

4.5.12 Unavoidable Adverse Effects

The following impacts are identified as potentially significant and for which there are no mitigating measures or that would not be mitigated to a level of insignificance.

Housing – This alternative would incrementally contribute to the unmet affordable housing demand in the city of San Francisco. Reduced rental rates offered to Presidio employee and tenant households with gross household incomes of less than $45,000 would offset some of this demand.

Cultural Resources – To the extent new construction would not conform to the Planning Guideline recommendations, the following departures would have a potential adverse effect on cultural resources.

- Removal of LAMC and LAIR and replacement construction consistent with Planning and Design Guidelines would not allow for infill construction as recommended in the GMPA, which would have an adverse effect on the adjacent historic hospital complex.
- Siting and length of connected buildings along O'Reilly Avenue would have an adverse effect on the adjacent historic structures.
- Removal of two historic tennis courts would have an adverse effect on these historic structures.
- Buildings along western edge of the 23-acre site would isolate it from the adjacent historic hospital complex, resulting in an adverse effect.
- The historic view corridor at Edie Road would not be preserved by the proposed building layout.

Noise – Short-term use of impact tools and demolition activities would be a source of increased noise to occupants and passive recreational users within the Letterman Complex. Mitigation measures proposed to reduce intrusions would reduce noise impacts but not to a level of insignificance to those users closest to (i.e., within 250 feet from) construction equipment.

4.5.13 Relationship of Short-Term Uses of the Environment and Maintenance and Enhancement of Long-Term Productivity

Use of the site for offices and research would preclude other long-term management possibilities for the Letterman Complex. These uses would occur within an intensively used area within the northern part of the Presidio, which would allow areas in the south and along the coast to remain more natural and experience less activity and development. Reinforcement of this overall use pattern would minimize impacts on the productivity of park resources.

Use of the site for a digital arts center would not affect any park ecosystem. Improvements to existing infrastructure would be considered sustainable actions that are expected to improve the operation of systems. Through implementation of the Planning Guidelines for the project, the Presidio Trust would promote environmental protection and sustainable design and encourage technologies and practices that would reduce environmental impacts or produce environmental benefits in water conservation and reclamation, energy conservation and transportation.

4.5.14 Irreversible or Irretrievable Commitments of Resources

New development would be designed and constructed to minimize consumption of energy and development of non-renewable fuels. Renewable sources of energy and new developments in energy-efficient technology, including recycling of materials and waste, would be fully explored and implemented to the extent possible. Although the site could be restored to previous conditions over time, the use of land, construction materials, energy, and financial resources to implement the alternative would, in a practical sense, be an irretrievable commitment of resources.

Archeological resources would be avoided where possible and historic resources would be protected. Where this is not possible, disturbance would be mitigated through recovery of cultural information and significant artifacts.

4.6.1 Consistency with Approved Plans and Policies

4.6.1.1 GENERAL OBJECTIVES OF THE GMPA AND PURPOSES OF GGNRA ACT

Alternative 6 is inconsistent with the General Objective of the GMPA to provide for appropriate uses of the Presidio. General office use does not ensure uses that involve stewardship and sustainability, cross-cultural and international cooperation, community service and restoration, health and scientific discovery, recreation, the arts, education, research, innovation, and/or communication.

Alternative 6 is also inconsistent with the GMPA's General Objectives to enhance and preserve the resources of the Presidio, to increase open space and consolidate developed space, or to provide for appropriate uses of the Presidio. Mothballing the LAMC would not contribute to the significance of the National Historic Landmark district, would not restore historic settings, would not allow for creation of open space and consolidation of developed space, and would not enhance the cultural, natural, recreational, or scenic resources of the Presidio. It also fails to meet other General Objectives; it would not promote visitor use and enjoyment, simplify the roadway network, or encourage sustainable design and conservation practices. Nor would it address the needs of Presidio visitors, tenants or residents, although it would not increase impacts on neighboring communities over the status quo.

This alternative is inconsistent with the GMPA's General Objective to sustain the Presidio economically because it does not allow the Trust to meet the financial planning parameters of the FMP. It therefore prevents the Trust from meeting the congressional directive of the Trust Act to make the Presidio financially self-sustaining by 2013.

Alternative 6 is inconsistent with the purposes of the GGNRA Act. It does not contribute to recreational open space or educational opportunities onsite or consolidate uses that might allow for enhancement of open space elsewhere. Nor does it contribute to enhancement of scenic beauty or natural character.

4.6.1.2 PRESIDIO GENERAL MANAGEMENT PLAN AMENDMENT

This alternative could conflict with the GMPA's major directions for the future of the Presidio and the Letterman Complex, since use of the LAIR may not be related to the park's purpose and the site could lack a major program center. Mothballing the non-historic LAMC would not contribute to the significance of the landmark district. Therefore, this alternative would be inconsistent with the GMPA's objective to restore historic settings. This alternative would leave in place buildings whose architecture and attributes are inconsistent with the surrounding historic buildings and setting. This alternative would not support the following parkwide goals and objectives:

- Promote visitor use and enjoyment.
- Enhance and restore scenic vistas.
- Simplify the roadway network.
- Adopt sustainable design and conservation practices.

4.6.1.3 SAN FRANCISCO GENERAL PLAN

While the Presidio is not subject to the General Plan, this alternative would be inconsistent with the General Plan policy to preserve the open space and natural historic, scenic and recreational features of the Presidio since minimal preservation actions would be taken to restore the historic setting.

4.6.2 Solid Waste

4.6.2.1 DISPOSAL OF DEMOLITION DEBRIS OFF SITE

Under Alternative 6, the LAMC would be "mothballed" and the LAIR would be permitted/leased for office and research use without major rehabilitation. No building demolition would occur and no debris would be generated. Thus, this alternative would have no impact on solid waste sites throughout the Bay Area.

4.6.3 Water Supply and Distribution

4.6.3.1 IMPACTS OF WATER CONSUMPTION ON BASELINE

Alternative 6 would demand approximately 35,000 gpd of water (Tables 12 and 13). Since the estimated water consumption of this alternative is well below the 89,000 gpd threshold established for the site, Alternative 6 is not expected to have a negative effect on the Presidio water supply.

4.6.3.2 IMPACTS ON FIRE FLOWS

Water flows available for fighting fire under this alternative would meet the requirements of the Uniform Fire Code.

4.6.4 Schools

4.6.4.1 IMPACT ON CAPACITY AT EXISTING OR NEW SCHOOL SITES

The impact of this alternative on SFUSD schools would be the same as Alternative 1 (Table 14). At full occupancy, Alternative 6 would generate 92 schoolchildren between the ages of 5 and 18 who would enroll in SFUSD schools. This level of enrollment is within the existing capacity of SFUSD. Therefore, Alternative 6 would not result in an adverse impact on SFUSD schools.

4.6.5 Housing

4.6.5.1 INCREASE IN HOUSING DEMAND

At buildout, the additional regional housing demand created by employment associated with Alternative 6 would be 159 housing units (Table 15). The Presidio housing stock would meet 100 percent of this housing demand. Since the employee housing demand under Alternative 6 can be accommodated at the Presidio, this alternative would not adversely impact the housing market within San Francisco and the surrounding Bay Area.

4.6.6 Medical Research

4.6.6.1 IMPACT ON MEDICAL RESEARCH

Under this alternative, the LAIR building could be leased to a tenant for reuse as a research facility. The impact of possible medical research reuse is described in Alternative 1. If the site were used for other than a medical research facility, the impact would be the same as under Alternative 3.

4.6.7 Traffic and Transportation Systems

Under Alternative 6, the existing roadway network within the 23-acre site would be maintained. No improvements to the intersection(s) of Lyon Street/Richardson Avenue/Gorgas Avenue would be made. The Lombard Street Gate would continue to be the major access gateway, and the Gorgas Avenue Gate would serve as a secondary entrance. Under Alternative 6, no improvements would be made to the pedestrian and bicycle circulation network within the complex, and no additional parking spaces would be provided.

4.6.7.1 ADDITIONAL TRAFFIC VOLUMES

Of the six alternatives, Alternative 6 would generate the fewest trips: 1,960 external (i.e., to areas outside the Presidio) weekday daily vehicle-trips and 220 vehicle-trips during the p.m. peak hour into and out of the Presidio (Table 16). Without geometric improvements to the intersection of Lyon Street/Richardson Avenue/Gorgas Avenue, traffic traveling north on Richardson Avenue would not be able to directly access the site at the Gorgas Avenue Gate, and would most likely use the Lombard Street Gate instead. Therefore, under the existing roadway network, the Lombard Street Gate is expected to carry the greatest percentage of traffic into the 23-acre site, accommodating 46 percent of the inbound traffic during the p.m. peak hour (Table 17). Similarly, because traffic would not be able to turn left directly onto Richardson Avenue, the Gorgas Avenue Gate is expected to carry only half of the outbound traffic on the existing roadway configuration, considerably less than the two-thirds of outbound traffic that would use the Gorgas Avenue Gate if the left turn were provided (Table D-9 in Appendix D).

4.6.7.2 IMPACTS ON INTERSECTION OPERATING CONDITIONS

Currently, during the p.m. peak hour, two of the study intersections operate at LOS C, four intersections operate at LOS B and one intersection operates at LOS A (Table 4). Under Alternative 6, three of the study intersections (Presidio Boulevard/Letterman Drive/Lincoln Boulevard, Mason Street/Marina Boulevard/Lyon Street, and Doyle Drive/Marina Boulevard/Lyon Street) would operate acceptably at LOS C during the p.m. peak hour, and the intersection of Presidio Boulevard/Lombard Street would operate acceptably at LOS D (Table 18). The 220 p.m. peak-hour vehicle trips generated by Alternative 6 land uses at the site would substantially affect the operating conditions at the intersection of Lombard and Lyon streets (Table 18), which would operate at LOS F during the p.m. peak hour. The Presidio Trust would coordinate with the City and County of San Francisco to ensure that funding was obtained and improvements, including signalization and restriping of the eastbound approach to two lanes. The improvements would improve the p.m. peak-hour operating conditions to LOS B.

4.6.7.3 INCREASED PARKING DEMAND AS A RESULT OF PROJECT-RELATED TRIPS

The parking demand of 580 parking spaces for Alternative 6 land uses would be substantially less than the existing supply of 770 spaces, resulting in a surplus of 190 spaces. Since this alternative would not include any changes to the existing parking supply, there would be a surplus of parking at the site. As shown on Table D-11 in Appendix D, weekend parking demand would be only 24 percent of weekday demand, therefore substantial parking would be available for recreational uses on weekends.

4.6.7.4 IMPACTS ON PEDESTRIAN AND BICYCLE FACILITIES

The 80 pedestrian and bicycle trips generated by Alternative 6 would result in minimal increases in pedestrian and bicycle activity in the vicinity of and within the Letterman Complex. The increase in demand would be accommodated within the existing bicycle and pedestrian facilities.

4.6.7.5 INCREASED DEMAND FOR PUBLIC TRANSPORTATION

Alternative 6 would generate 60 p.m. peak hour transit trips that would primarily be accommodated on the 29-Sunset (16 trips) and the 82X-Levi Plaza Express (15 trips).

The average passenger load on Golden Gate Transit transbay buses during the a.m. and p.m. peak hours is about 30 passengers per bus, and there are about 120 buses per hour during the a.m. peak hour and about 110 buses per hour during the p.m. peak hour for about 23 different transbay routes (Golden Gate Bridge, Highway and Transportation District 1997). Alternative 6 would generate nine transit trips to the North Bay in the p.m. peak hour. If these project-generated passengers were distributed across the 23 Golden Gate Transit routes proportionally to the existing distribution of passengers across routes, the project would add a maximum of one passenger to each route. An additional passenger would not cause the passenger load to exceed the bus capacity for any one line.

4.6.7.6 IMPACTS OF TRANSPORTATION DEMAND MANAGEMENT MEASURES

At a minimum, the TDM strategies listed at the beginning of Section 4.1.7 would be incorporated into this alternative to encourage non-automobile modes and reduce parking demand. A TDM program, as discussed in mitigation measure TR-8, would be developed that would establish specific performance targets and a monitoring and reporting process.

4.6.7.7 CONSTRUCTION IMPACTS

Alternative 6 would not result in any substantial construction activity at the site. Traffic impacts would be minimal.

4.6.8 Cultural Resources

4.6.8.1 EFFECT ON HISTORIC BUILDINGS DUE TO BUILDING TREATMENTS

Building and landscape improvements would be minimal because LAMC would be kept out of service and mothballed, and LAIR would be reused. Retaining these structures would not allow for the rehabilitation of the 23-acre site to enhance its historic setting.

4.6.8.2 EFFECT ON EXTANT CULTURAL LANDSCAPE FEATURES

Under this alternative, limited site improvements and rehabilitation would occur. The historic Lyon Street windrow and other remnant historic tree plantings would be maintained and rehabilitated. The Presidio boundary wall and Lombard Street Gate would be preserved and rehabilitated. No major enhancement or restoration projects would be implemented. These actions would not have an adverse effect on the district.

4.6.8.3 EFFECT DUE TO INTERSECTION AND ROADWAY IMPROVEMENTS

No major intersection improvements would be implemented. Critical safety issues would be addressed through ongoing maintenance of the road system, as needed. These actions would not have an adverse effect on the district.

4.6.8.4 VISUAL IMPACT

Since no significant changes to existing site conditions would be made, there would be no change to existing scenic views. Therefore, LAMC would continue to block viewsheds from elsewhere on the Presidio to the 23-acres site. The overall visual quality of the 23-acre site would remain the same and would not be enhanced through site improvements.

4.6.8.5 EFFECT OF VISITOR EXPERIENCE

Under this alternative, the visitor experience would not be greatly expanded or fully realized. The LAMC and LAIR could be occupied by agencies or organizations that would not provide visitor opportunities to the public to the extent that the other alternatives would. However, these organizations would most likely provide some public access and visitor programs that would provide beneficial effects.

4.6.8.6 EFFECT ON ARCHEOLOGICAL PROPERTIES

Under this alternative, there would be no likelihood of encountering archeological resources since no ground disturbing activities would occur.

4.6.9 Air Quality

4.6.9.1 SHORT-TERM DEMOLITION/CONSTRUCTION IMPACTS

Under Alternative 6, the LAMC would be “mothballed” and the LAIR would be permitted/leased for office and research use without major rehabilitation. No building demolition or replacement construction would occur within the Letterman Complex. Thus, this alternative would not cause any air quality impacts due to demolition or construction.

4.6.9.2 LONG-TERM REGIONAL OPERATION IMPACTS

Alternative 6 would result in an increase of up to approximately 2,210 internal and external vehicle trips per day. Based on URBEMIS7G modeling results, increased vehicle trips associated with the alternative would generate approximately 22 lb/day of ROG, 37 lb/day of NO_x, 16 lb/day of PM_{10}, and 265 lb/day of CO. These emission rates are summarized in Table 22. Alternative 6 would not result in regional operational emissions exceeding any of the BAAQMD‘s significance thresholds for ROG, NO_x, or PM_{10}.

Similar to the impacts under Alternative 1, direct and indirect emissions from the use of electricity and natural gas due to Alternative 6 would not be significant when compared to the emissions caused by project-related traffic, and the alternative would not have the potential to expose nearby receptors to toxic air contaminants.

4.6.9.3 LONG-TERM LOCAL OPERATIONS IMPACTS

Localized CO impacts due to project traffic are described under Alternative 1. Because year 2010 traffic with Alternative 6 would cause fewer than 1,680 vehicles in the p.m. peak hour through the Lombard Gate, the localized CO concentrations for Alternative 6 would be less than 7.9 ppm on a 1-hour basis and less than 5.4 ppm on an 8-hour basis. These localized CO concentrations would not exceed the state ambient air quality standards for CO.

4.6.10 Noise

4.6.10.1 SHORT-TERM DEMOLITION/CONSTRUCTION NOISE IMPACTS

Under Alternative 6, no building demolition or replacement construction would occur at the Letterman Complex. Thus, this alternative would not cause any impact due to demolition or construction noise.

4.6.10.2 LONG-TERM TRAFFIC NOISE INCREASES

The impacts of traffic noise caused by Alternative 6 would be substantially less than those described under Alternative 1. As such, the traffic noise associated with Alternative 6 would not cause a significant impact.

4.6.10.3 LONG-TERM STATIONARY SOURCE NOISE IMPACTS

The impacts of stationary sources of noise associated with Alternative 6 would be similar to those shown under Alternative 1. No significant long-term stationary source noise impacts are expected.

4.6.11 Cumulative Impacts

4.6.11.1 SOLID WASTE

Because only minimal construction and demolition activities would occur under this alternative, Alternative 6 would not contribute to a cumulative reduction in regional solid waste capacity.

4.6.11.2 WATER SUPPLY

The Lobos Creek watershed would be insufficient to supply the in-stream flow requirement necessary to maintain natural streambed characteristics and meet peak Presidio daily demands of 1.63 mgd with this alternative. Minimum management and uses of all Presidio buildings listed in Table 9 would contribute to a net cumulative peak shortfall of approximately 237,000 gpd on the Presidio-wide water supply due to excess demand (BAE 2000). Water supply- and demand-side measures and instream flow monitoring similar to those described in mitigation measures WS-2, *Water Supply- and Demand-Side Solutions to Reduce Cumulative Impacts*, WS-3, *Instream Flow Monitoring to Reduce Cumulative Impacts*, and WT-1, *Water Reclamation Plant to Reduce Cumulative Impacts*, would be required to minimize cumulative impacts on the system and baseline stream flow maintained in Lobos Creek.

Under this alternative, projects within the surrounding area would still occur, resulting in increased water consumption, but according to the city, not in excess of amounts expected and provided for in this area. In general, the projects represent replacement or renovation of existing facilities previously served by the city. New construction would be subject to current city of San Francisco water conservation code requirements.

4.6.11.3 SCHOOLS

The cumulative impacts to SFUSD resulting from this alternative would be similar to Alternative 1.

4.6.11.4 HOUSING

This alternative and other projects listed in Table 9 would add 2,089 employees to the local economy. The leasing and use of the LAIR and LAMC accounts for 828 jobs, or 40 percent of this total. This growth in employment is estimated to require 402 new housing units (BAE 2000). Under this alternative, 1,331 new housing units (1,304 renovated units on the Presidio and 27 new units in the Marina District) would be added to the local supply. Because housing demand would be more than offset by the housing units added to the local supply (largely by reactivation of the housing units at the Presidio), cumulative demand under this alternative would not contribute to employment-related housing demand increases in the surrounding neighborhood or city.

4.6.11.5 TRAFFIC AND TRANSPORTATION SYSTEMS

The increase in traffic on adjacent and local roadways and intersections due to reuse of the site would be minimal, and Alternative 6 would only make up 14 percent of the total p.m. peak-hour traffic resulting from cumulative projects (Table 19). Therefore, traffic generated by Alternative 6 would have a minor cumulative effect on local and regional traffic growth and related congestion. The combined cumulative projects, including Alternative 6, would generate increased traffic volumes throughout the Presidio. The cumulative projects would create 300 additional vehicles on Lincoln Boulevard during p.m. peak hour, and Alternative 6 would make up about 6 percent of the additional traffic.

The total additional parking demand due to the cumulative projects, including Alternative 6, would be 3,692 parking spaces. Alternative 6 would make up only 19 percent of this demand within the Presidio and 16 percent of the total cumulative parking demand within the project impact zone, a relatively small portion compared to other alternatives (Table 21). The GMPA's 8,390-space parking supply would accommodate cumulative demand within the park. Parking impacts outside the Presidio are described in Alternative 2.

The alternative's contribution to cumulative growth would have a minor cumulative effect on local and regional traffic growth and related congestion.

4.6.11.6 CULTURAL RESOURCES

Since this alternative would not involve the removal of nonhistoric structures, new compatible construction, or the preservation of the cultural landscape, this alternative would not contribute to efforts to protect cultural resources within their historic settings. Under this alternative, there would be minimal likelihood of encountering archeological resources, because limited ground-disturbing activities would occur.

4.6.11.7 AIR QUALITY

This alternative would contribute to a cumulative increase in vehicle trips on the region's roadways and therefore cumulative increases in regional emissions. The cumulative operational emissions would cause

localized impacts at congested intersections in the vicinity of the projects, but the resulting impacts would not be expected to cause local violations of ambient air quality standards. Anticipated cumulative increases in vehicle trips would also result in increases to region-wide emissions of ozone precursors (including NO_x and ROGs) and CO. The proposed development would cause emissions of ozone precursors that fall below the thresholds set forth in federal regulations for conformity determinations (as shown in Table 22). Emissions of CO that would be caused by the cumulative scenario under Alternative 6 are accounted for in the current maintenance plan for CO, as discussed in Section 5.4.2. Because this alternative would be in conformance with regional air quality plans, no further conformity analysis is necessary, and no significant cumulative impacts would occur.

4.6.11.8 NOISE

Construction activities associated with repairs to infrastructure, building rehabilitation, limited transportation improvements, and reconstruction of Doyle Drive would cause short-term cumulative noise impacts. Long-term cumulative noise impacts around the Letterman Complex would primarily result from increased traffic on Doyle Drive (U.S. Highway 101), and other roads internal and external to the Presidio. None of the roadway segments near noise-sensitive receptors would experience greater than two-fold peak-hour traffic increases. Therefore, no significant cumulative noise impacts are expected.

4.6.12 Unavoidable Adverse Effects

The impacts that follow are those identified as potentially significant and for which there are no mitigating measures or that would not be mitigated to a level of insignificance.

Cultural Resources – The following would have a potential adverse effect on cultural resources:

- The presence of the LAMC tower would continue to have an adverse effect on the viewsheds from the Presidio to the 23-acre site, resulting in an adverse visual impact.

4.6.13 Relationship of Short-Term Uses of the Environment and Maintenance and Enhancement of Long-Term Productivity

This alternative would not be a sustainable action that could continue over the long term without environmental problems. Alternative 6 would not meet the needs of the present in such areas as infrastructure improvements, interpretation, visitor management and revenue generation, and it could also compromise the ability of future generations to meet their needs. Mothballing of the LAMC, however, would not foreclose options for future preservation and use.

4.6.14 Irreversible or Irretrievable Commitments of Resources

This alternative would result in generally fewer commitments of resources than the other alternatives since no new development would occur. However, Alternative 6 would not explore recycling or conservation to the degree that would be implemented in the other alternatives.

As part of any new development and uses on the 23-acre site within the Letterman Complex, the Presidio Trust would implement the following mitigation measures to the extent feasible and appropriate. These measures represent modifications to the alternatives that would reduce potentially significant impacts on the following resources to a less-than-significant level. All measures would be regularly evaluated and monitored by the Presidio Trust to determine their effectiveness in reducing impacts.

4.7.1 Geology and Earthquakes

GE-1. *Seismic Hazard Evaluation* – Replacement construction would be allowed to proceed only when the nature and severity of the seismic hazards at the site have been evaluated in a geotechnical report and appropriate structural and design measures have been incorporated into the new construction. A registered civil engineer or certified engineering geologist having competence in the field of seismic hazard evaluation and mitigation would prepare the geotechnical report. The geotechnical report would contain site-specific evaluations of the seismic hazards affecting the project, and would identify any portions of the site containing seismic hazards. The report would also identify any known offsite seismic hazards that could adversely affect the site in the event of an earthquake. The contents of the geotechnical report would include, but not be limited to, the following:

- Project description.
- A description of the geologic, geotechnical and soils conditions at the site, including an appropriate site location map.
- Evaluation of site-specific seismic hazards based on geological, geotechnical and soils conditions, in accordance with current standards of practice.
- Recommendations for appropriate mitigation measures, such as standard structural engineering techniques for foundations and building structural features, that are consistent with established practice and that would reduce seismic risk to acceptable levels.
- Investigation of and integration of soil factors into engineering strengths of existing foundations and structural systems, in accordance with current standards of practice, if existing structures are considered for reuse.
- Name of report preparer(s), and signature(s) of a certified engineering geologist and/or registered civil engineer having competence in the field of seismic hazard evaluation and mitigation.

The Presidio Trust would independently review the geotechnical report to determine the adequacy of the hazard evaluation and proposed mitigation measures. A certified engineering geologist or registered civil engineer having competence in the field of seismic hazard evaluation and mitigation would conduct such reviews.

GE-2. *LAIR Investigation Report (Alternative 1 Only)* – This mitigation measure would apply to Alternative 1 only. Should the LAIR building be considered for reuse, a site investigation report prepared by a certified engineering geologist and/or a civil engineer practicing within the area of his or her competence would

document the results of an investigation of the structure for seismic safety and recommend structural and design measures to reduce the risk of identified seismic hazards to acceptable levels.

4.7.2 Water Quality

WQ-1. *Implementation of Best Management Practices* – Structural and operational best management practices (BMPs) and specific design criteria based upon the California BMP handbooks would be incorporated into project design during the preparation of plans and specifications, including the Storm Water Pollution Prevention Plan (see mitigation measure TS-1). Structural BMPs would include improvements to address runoff, existing and proposed parking areas, oil and grease traps in catchbasins, infiltration systems, stormwater detention basins, dry wells/cisterns, and biofilters. Operational BMPs to be implemented would include erosion control, structure maintenance, pipeline maintenance, pavement cleaning, landscape chemical management, stormwater monitoring, education and training, and tenant controls.

4.7.3 Solid Waste

SW-1. *Waste Reduction Goals* – The Presidio Trust would divert at least 50 percent of the waste stream due to demolition within the Letterman Complex from landfill sites by salvage and reuse in order to promote and demonstrate conservation practices in waste reduction and recycling.

4.7.4 Water Supply and Distribution

WS-1. *Fire Flows* – The selected development team would be required to implement one or more of the following actions: fix specific deficiencies in the onsite water distribution system to provide required fire flow (and duration of flow); install onsite hydrants according to the Uniform Fire Code; use sprinkler systems within buildings, and if necessary, use resistive construction.

WS-2. *Water Supply- and Demand-Side Solutions to Reduce Cumulative Impacts* – The Presidio Trust, in cooperation with all its tenants, would implement the following supply- and demand-side solutions to mitigate potential shortfalls from the Presidio water supply: [1]

- Install water meters and develop marginal cost pricing incentives for use of water beyond projected use allocations (potential water savings: 10,000 gpd);
- Install low-flow toilet and shower fixtures, as well as faucet aerators to reduce water consumption during sink use (potential water savings: 20,000 gpd);
- Optimize irrigation through dawn/dusk water schedules, selection of drought-tolerant plants where appropriate, drip systems, automated irrigation controls, etc. (potential water savings: 80,000 gpd);

[1] The numbers for water savings in parentheses are Presidio-wide estimates.

- Provide comprehensive water conservation education to tenants and residents (potential water savings: 10,000 gpd); and
- Reduce water demand from Lobos Creek by securing an alternate water supply source, such as the use of reclaimed water from the Presidio's water reclamation system (see WT-1 below) for Presidio irrigation purposes (potential water savings: 200,000 gpd), purchased water, onsite well water, or by exchange underground water from other sources (subject to additional environmental analysis and agency review).

WS-3. *Instream Flow Monitoring to Reduce Cumulative Impacts* – To monitor the need for additional water conservation programs and/or securing additional water supply, the Presidio Trust would establish an instream flow monitoring system capable of communicating real time data directly to the water treatment plant to ensure that Lobos Creek flow levels are consistently maintained.

4.7.5 Wastewater Treatment and Disposal

WT-1. *Water Reclamation Plant to Reduce Cumulative Impacts* – As appropriate or necessary to reduce cumulative impacts, the Presidio Trust would develop a water reclamation plant capable of reclaiming and treating a minimum of 200,000 gpd of sanitary sewage extracted from the Presidio main sewer line. The reclaimed water would be made available to supply irrigation water for use in the Presidio and to lower the volume of wastewater discharged to the city's combined sewer system. The water reclamation plant would comply with the water quality criteria, treatment processes, treatment reliability, monitoring and reporting, and restrictions for use of reclaimed water established by the California Department of Health Services in Title 22, Division 4 (Environmental Health) of the California Administrative Code. These criteria would be those applied by the California Regional Water Quality Control Board (San Francisco Bay Region) to ensure that the reclamation plant is safe, reliable, and protective of public health. An engineering report prepared by a properly qualified engineer registered in California and experienced in the field of wastewater treatment, and containing a description of the design of the reclamation system would be filed with the California Regional Water Quality Control Board. The report would indicate the means for compliance with the environmental health regulations and would be integrated with environmental analysis and related studies to satisfy NEPA requirements. The report would also contain a contingency plan that would ensure no untreated or inadequately treated wastewater would be delivered to proposed use areas (potential reduction in wastewater overflow volumes: 200,000 gpd).

4.7.6 Traffic and Transportation Systems

TR-1. *Lyon Street/Richardson Avenue/Gorgas Avenue Intersection Improvements* – Concurrent with the development of the 23-acre site, the Presidio Trust would coordinate with Caltrans, the City and County of San Francisco, and the selected development team to reconfigure the intersection to provide left turns from Richardson Avenue to Gorgas Avenue and left turns from Gorgas Avenue to Richardson Avenue at two separate intersections. These improvements would provide for direct access and egress to the Letterman Complex via Richardson Avenue prior to reconstruction of Doyle Drive. Preliminary planning for the reconstruction of Doyle Drive indicates that direct vehicular access into the Presidio from Doyle Drive would

be provided. Caltrans and the City and County of San Francisco have initiated preliminary environmental and design efforts for Doyle Drive reconstruction, but selection of a preferred alternative is not expected until the third quarter of 2001.

TR-2. *Lombard Street/Lyon Street Intersection Improvements* – Concurrent with the development of the 23-acre site, the capacity of this intersection would be increased through signalization of the intersection and restriping the one-lane eastbound approach to provide one left-turn lane and one shared right-through lane. The Presidio Trust would coordinate with the City and County of San Francisco and the selected development team to determine the contribution of each party to the cost of the improvements.

TR-3. *Lombard Street/Presidio Boulevard Intersection Improvements* – When needed (i.e., prior to the intersection falling to level of service E or F), the capacity of this intersection would be increased through widening and restriping the one-lane northbound approach to provide one right-turn lane and one through lane. The Presidio Trust would coordinate with the selected development team and determine its contribution, if any, to the cost for the improvements.

TR-4. *Monitoring of Parking* – The overall parking supply and demand would be monitored periodically to accommodate onsite parking demand, encourage transit use and other non-automobile modes of travel, and discourage parking outside the 23-acre site. This measure would be implemented through a parking management plan that will be developed for the Presidio. This plan would include Presidio-wide parking management and operations strategies to ensure a balance of parking supply and demand, minimizing transportation impacts on the Presidio and surrounding neighborhoods, while encouraging tenants and visitors to use alternative modes. Strategies would include adoption and monitoring of Transportation Demand Management measures (see mitigation measure TR-8), recommending parking regulations in adjacent neighborhoods, and frequent monitoring of parking demand.

TR-5. *Construction Traffic Management Plan* – Prior to construction, a Construction Traffic Management Plan would be prepared by the contractor(s) and submitted for Trust approval. The plan would include information on construction traffic scheduling, proposed haul routes, permittee parking, staging area management, visitor safety, and detour routes. As discussed in mitigation measure SW-1, *Waste Reduction Goals*, the LAMC and LAIR would be deconstructed and building materials would be reused to the extent feasible, thus minimizing the transport of demolition debris. The contractor(s) would limit the transport of demolition debris and construction equipment and materials to periods of off-peak traffic whenever possible. Construction equipment, including trucks, would be restricted from accessing Lyon Street to minimize additional traffic on the surrounding neighborhood roadways and intersections. Since the construction activities associated with the Letterman Complex would likely overlap in some degree with other planned projects in the vicinity of the Letterman Complex, the contractors for such other projects would be required to coordinate with the development team of the 23-acre site to address vehicle routing, traffic control, and pedestrian movement in the vicinity of the Letterman Complex. Any significant alterations to the Construction Traffic Management Plan would be subject to written approval by the Presidio Trust prior to implementation.

TR-6. *Relocation of the City's Bike Route 4* – Prior to implementation of intersection improvements at Lyon Street/Richardson Avenue/Gorgas Avenue, the Presidio Trust would coordinate with the City and County of San Francisco to relocate a portion of the city's bike route 4 from Francisco Street between Lyon Street and Broderick Street, to Chestnut Street between Lyon Street and Broderick Street and to Broderick Street between Chestnut Street and Francisco Street.

TR-7. *Adjustment of Bicycle Entry Points near the Lombard Street Gate* – Implementation of mitigation measure TR-2 may require adjustment of routes and physical improvements to facilitate access for bicycles entering the Presidio via the city's bike route 4 (relocated to Chestnut Street, see mitigation measure TR-6) and bike route 6 (Greenwich Street). The Presidio Trails and Bikeways Study (in progress) will consider alternatives to the current access on Lombard Street, to include widening the pedestrian walkway at the Lombard Street Gate, re-establishing the historic opening of the Presidio perimeter wall at Greenwich Street (subject to additional environmental review, including Section 106 compliance), relocating bike route 4 to Gorgas Street, or creating an expanded bicycle and pedestrian path from the Lombard Street Gate.

TR-8. *Transportation Demand Management (TDM) Program* – The Presidio Trust would require tenants and occupants to participate in a TDM program for the Presidio. The TDM program would establish the actions to be taken by the Presidio Trust and all park tenants and occupants to improve transit, pedestrian and bicycle conditions, and reduce automobile usage by all tenants, occupants and visitors, including:

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

All Presidio tenants, including tenants of the 23-acre site within the Letterman Complex, would be required to participate in the Presidio's TDM program designed to meet performance targets, including a modal split such that at least 30 percent of all employees and visitors travel by transit or non-motorized modes, and vehicle

occupancy of at least 1.4 persons per vehicle per auto trip.[2] Performance would be monitored through traffic counts and park-wide user surveys consistent with the TDM program. The Presidio Trust would work closely with the proponent to insure successful implementation of the TDM programs. An annual report of the Presidio's TDM program and conditions would be prepared by the Presidio Trust and made available to the public.

The Letterman lease would include provisions requiring the tenant to participate in the TDM program, and the tenant's Transportation Coordinator would assist the Presidio Trust's Transportation Manager to maximize participation in the TDM program. Elements of the TDM program specific to the 23-acre site would include:

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

4.7.7 Cultural Resources

CR-1. *Planning and Design Guidelines* – Under provisions of the NHPA, a Programmatic Agreement has been developed in consultation with the California State Historic Preservation Officer (SHPO), the Advisory Council on Historic Preservation (ACHP) and the NPS regarding the Deconstruction, New Construction, and the Execution of Associated Leases at the Letterman Complex. (Appendix F). Provided for in the Programmatic Agreement are significant roles for these entities in the process of developing design guidelines, conceptual design documents and schematic design documents; also provided for in the Programmatic Agreement are significant roles for these agencies in the construction monitoring process. In addition, the Programmatic Agreement contains opportunity for public input, methodologies for addressing archeological properties, discoveries and unforeseen effects, and a requirement of mandatory notification to the Secretary of the Interior and invitation for the Secretary to participate in consultation where there may be an adverse effect on historic properties.

The Final Planning Guidelines in Appendix B, which have been publicly reviewed and finalized as part of this EIS, will be merged into the Design Guidelines, which are now under development and must be submitted to

[2] Performance targets would be flexible so that any combination of mode and vehicle occupancy producing the equivalent number of autos would be acceptable. That is, an average vehicle occupancy less than 1.4 would be acceptable if a non-auto mode share of greater than 30 percent produced the equivalent number of autos.

the SHPO for review and comment as part of the NHPA's Section 106 consultation process. The Final Planning Guidelines would therefore be applied and continue to provide direction through the consultation and design review process under the Programmatic Agreement where there would be continuing review of their application by the ACHP, SHPO, NPS, and the public after the environmental review process for this action is concluded.

The Planning Guidelines and Design Guidelines for new construction at the Letterman Complex would be utilized by the Presidio Trust in its review of an undertaking's effect on the character of the historic district. In addition, incorporation of sustainability provisions within the guidelines would assist the Presidio in meeting sustainability goals. The criteria in the Planning and Design Guidelines would guide all replacement construction of buildings (e.g., massing, scale, heights, roof forms, colors, and materials.) The guidelines would conform to *The Secretary of the Interior's Standards for the Treatment of Historic Properties*. New buildings and landscape features would be designed and sited to be compatible with and enhance the historic setting. Historic buildings would be rehabilitated in accordance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*, including the *Guidelines for Rehabilitating Historic Buildings.* In accordance with the Programmatic Agreement, copies of the guidelines (as well as public comments received on their content) would be sent to the SHPO for review.

Where a project, as here, is in the early conceptual stages, the Planning Guidelines should not be viewed as rigid rules. They have been prepared as a continuing interactive set of "guides" to help shape future actions as built and would serve as guides as the project moves through the process of negotiation, the signing of a lease, or the execution of a development agreement. The Trust's intent is to ensure that the project meets the overall intent of the guidelines while project design and construction conforms as closely as practicable to the specific direction of Planning and Design Guidelines.

CR-2. *Planning and Design Guidelines for Infill Construction (Alternative 1 Only)* – This mitigation measure would apply to Alternative 1 only. New construction outside the 23-acre site would require modification to the Planning Guidelines and development of Design Guidelines to support proposed uses. The guidelines would direct the design of compatible structures within the existing historic setting and street patterns of the existing historic hospital complex. These changes to the guidelines would require additional consultation and coordination subject to the Programmatic Agreement.

4.7.8 Archeological Properties

AR-1. *Archeological Management Assessment and Monitoring Program* – The Presidio Trust would conduct an Archeological Management Assessment and Monitoring Program for all undertakings at the Letterman Complex. The Presidio Trust would conduct an inventory study of known archeological sites in the area of each undertaking including test excavations, as appropriate, to determine if significant sites or historic features are extant and if construction might adversely affect archeological resources. Reports of any investigations would be submitted to the SHPO and the ACHP. A phased inventory, evaluation, monitoring, and treatment program for archeological resources regarding ongoing maintenance and construction in the complex would be

conducted. The discovery of any human remains or associated mortuary items covered under the Native American Graves Protection and Repatriation Act would be treated in accordance with 43 CFR 10.4 (Inadvertent discoveries). Consultation and work would be conducted in accordance with the Programmatic Agreement (Appendix F to the EIS).

4.7.9 Wetlands and Stream Drainages

SD-1. *Protection of Tennessee Hollow (Alternative 1 Only)* – This mitigation measure applies to Alternative 1 only, because this would be the only alternative that could impact the future restoration potential of the drainage. Improvements including the design of walkways, landscaping, or structures in the western portion of the Letterman Complex would anticipate the future restoration of the Tennessee Hollow riparian corridor. The stream buffer zone would be mapped based on information developed by technical experts to ensure that such improvements would not be allowed within this zone. Asphalt for trail and any other construction in areas that drain toward the riparian corridor would be avoided, and stormwater runoff water quality would be maintained through biofiltering. No tree removal within the zone would occur without appropriate environmental review.

4.7.10 Native Plant Communities

NP-1. *Landscaping Plan* – A detailed landscaping plan would be prepared and approved as part of the design review process. The landscaping plan would be prepared in consultation with Presidio Trust staff and in accordance with applicable policies, guidelines and plant selection lists. Planning would take into account opportunities for native habitat enhancement where feasible and appropriate.

4.7.11 Wildlife

WL-1. *Ornamental and Native Stand Protection* – Management treatments and practices described in the *Natural Resource Inventory and Vegetation Management Options* (NPS 1997a) would be taken to protect the most valuable habitat based on observed bird diversity within the 23-acre site. These habitat areas would include the palms, the coast live oaks, the redwood, and the Monterey pines and eucalyptus within the historic windrows. Measures would include restricting the size of work areas, avoiding work when soils are wet and compaction-prone, and carefully training work crews to reduce potential impacts on vegetation.

WL-2. *Raptor Nests* – Prior to any construction activities, a qualified biologist would determine whether any birds of prey are nesting in the vicinity and whether they might be impacted by development. Observations would be made during the breeding season (January through July) prior to and during construction activities. If nesting pairs are located in the work vicinity, appropriate buffer zones would be delineated and the area closed by installation of temporary fencing until nesting activity is determined to have ended. Other preventive measures, such as the use of signing, implementation of a monitoring program, and establishment of contingency plans, would also be implemented as necessary to avoid accidental habitat degradation during the construction phase.

WL-3. *Nesting Birds* – Any removal (including mowing and tree-trimming) of landscaped, non-native, or native vegetation would follow applicable laws and park guidelines for protection of nesting birds. These guidelines include restrictions on timing of vegetation removal, requirements for searching for active nests prior to removal, and maintaining mowed areas at low height to discourage nesting. Restriction of work areas and education of work crews would also reduce possible wildlife impacts.

WL-4. *Integrated Pest Management* – All tenants would be educated about and would implement the integrated pest management options for managing the major pests found at the Presidio as identified in the *Integrated Pest Management Information Manual for the Presidio* (NPS 1996b). Visitors would have signs and information regarding the importance of litter control, not feeding wildlife, and pest management issues.

4.7.12 Topography and Soils

TS-1. *Storm Water Pollution Prevention Plan* – As directed by the Clean Water Act and other applicable requirements, a Notice of Intent would be filed with the State Water Resources Control Board prior to initiation of soil-disturbing activities to obtain coverage under the NPDES General Permit for Storm Water Discharges Associated with Construction Activities (General Permit). The General Permit requires development, implementation, and compliance monitoring of a SWPPP that prescribes BMPs including structural, management, and vegetation measures to control erosion and contaminated runoff from the construction site. The inclusion of an analysis of potential downstream impacts on receiving waterways due to the permitted construction may be required. The Presidio Trust would minimize the discharge of soil and pollutants during excavation by requiring contractors to employ measures to contain disturbances within localized areas, including use of turbidity barriers, silt curtains, or equivalent measures as feasible and appropriate. Prescriptions for monitoring and reporting of BMP performance and conditions before and immediately after the completion of work would be conducted pursuant to the General Permit. Compliance with the BMPs included in the SWPPP would result in a minimal amount of soil erosion, and discharges of construction-related pollutants would be minimized.

4.7.13 Air Quality

AQ-1. *Bay Area Air Quality Management District (BAAQMD) Control Measures* – To reduce construction-generated particulate matter (PM_{10}) emissions, construction contractors would implement as feasible and appropriate the BAAQMD's recommended control measures for emissions of dust during construction: 1) water all active construction areas at least twice daily; 2) cover all trucks hauling soil, sand, and other loose materials or require trucks to maintain at least 2 feet of freeboard; 3) pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas and staging areas; 4) sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas; and 5) sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets.

AQ-2. *Demolition of Existing Buildings* – To the extent feasible and appropriate, the Presidio Trust would apply an environmentally effective approach, including a combination of deconstruction and demolition techniques, to remove outdated structures and reduce PM_{10} emissions from demolition activities.

AQ-3. *Transportation Measures* – All measures listed in the transportation mitigation section would be implemented to the extent feasible to encourage alternatives to automobile use, contribute to improvement of air quality and lower carbon dioxide emissions.

AQ-4. *Stationary Source Permits* – The U.S. Army's stationary source permits for the Letterman Complex have been transferred to the Presidio Trust. All permit requirements would remain in force. Any further permits needed by tenants would require compliance with applicable federal, state and local laws regarding air quality.

4.7.14 Noise

NO-1. *Reduction of Construction Noise* – During demolition and construction, contractors and other equipment operators would be required to comply with the terms of provisions equivalent to the standards in the San Francisco Noise Ordinance. Noise-generating construction activities associated with new development would not occur during times of the day in which such construction activities are prohibited under the San Francisco Noise Ordinance. Impact tools would be equipped with intake and exhaust mufflers, and commencement of any explosive or implosive activities would be coordinated with appropriate approvals and notifications from the Presidio Trust. To reduce noise impacts on visitors, construction sites would be temporarily off-limits to visitors. To further reduce noise impacts, where feasible, appropriate barriers would be placed at a distance of 250 feet between sensitive receptors and construction sites and stationary equipment such as compressors and crushers. This would reduce noise by as much as 5 A-weighted decibels (dBA).

4.7.15 Visual Resources

VR-1. *Planning and Design Guidelines* – The Planning and Design Guidelines would be applied as set forth in mitigation measure CR-1 during site planning to protect visual resources.

VR-2. *Height of Replacement Construction* – The height of replacement construction would be compatible with nearby structures, with a maximum allowable height not to exceed that of LAIR (60 feet) as identified in mitigation measure CR-1, *Planning and Design Guidelines*.

VR-3. *Maximum Allowable Square Footage* – The maximum allowable square footage for replacement construction would not exceed 900,000 square feet on the 23-acre site or 1.3 million square feet for the entire 60-acre Letterman Complex.

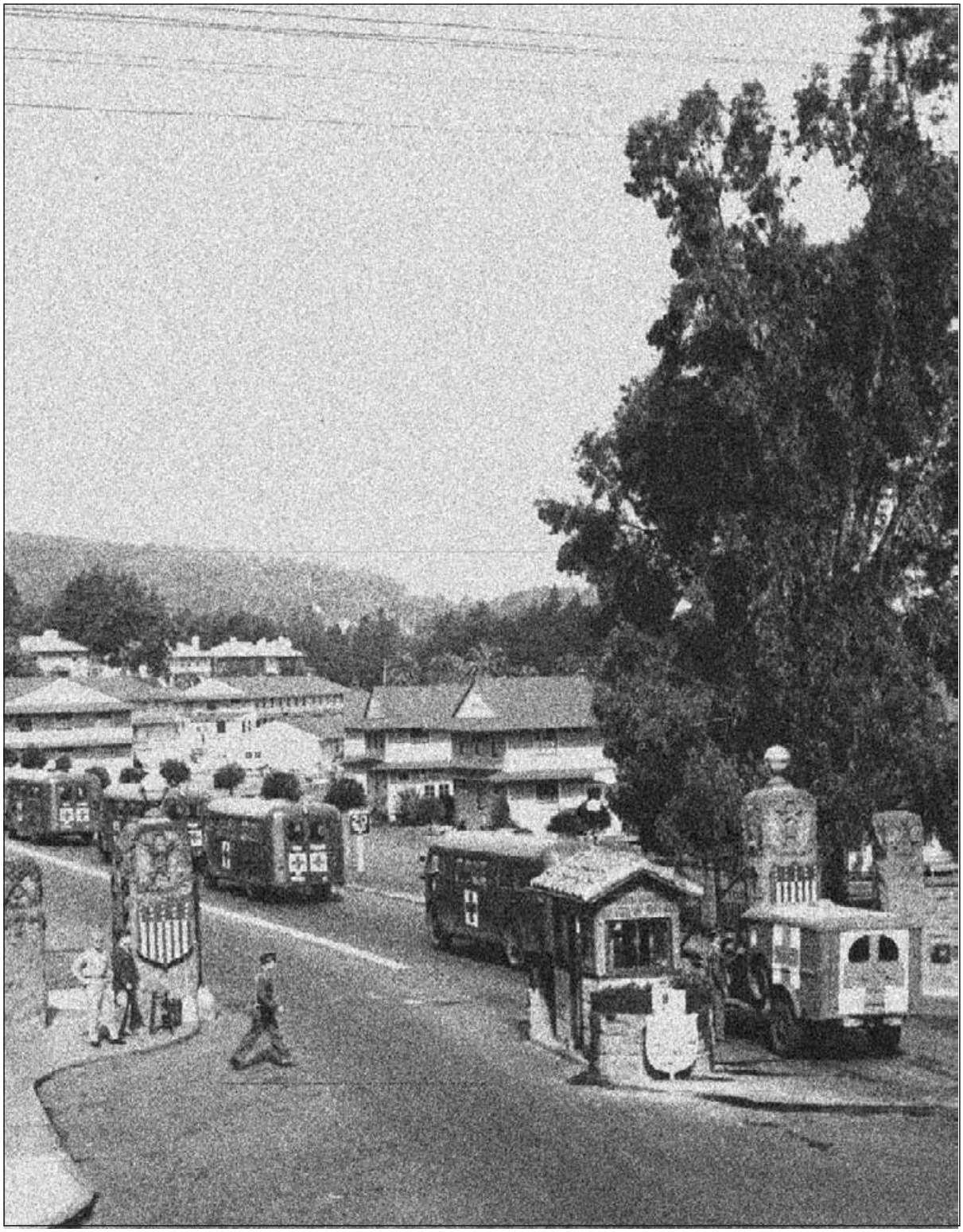
VR-4. *Vegetation Screen* – The vegetation screen next to the parking area along Lyon Street would be maintained to the extent feasible and appropriate.

4.7.16 Human Health, Safety and the Environment

HH-1. *Asbestos Remediation* – Prior to initiating building demolition within the Letterman Complex, the Presidio Trust would identify all asbestos-containing materials and assess, document, and monitor their condition. The party conducting the building demolition would be responsible for compliance with all applicable asbestos regulations. During removal, workers would use all necessary personal protective clothing and respiratory equipment, and all safety measures would be followed to prevent any contamination outside the removal area. Air purification and air monitoring equipment would be in operation during removal in interior areas. Air sampling would be conducted during removal. Encapsulation would be done using approved sealants. All waste asbestos would be placed in approved and labeled double 6-millimeter plastic bags or approved labeled Department of Transportation (DOT) drums. Waste asbestos would be properly transported under strict adherence to Environmental Protection Agency/Resource Conservation Recovery Act (EPA/RCRA), state and local regulations by a licensed hazardous waste hauler to an approved waste site. All necessary shipping documents would be prepared prior to any shipments.

HH-2. *Lead-Based Paint Abatement* – Prior to initiating building demolition within the Letterman Complex, the Presidio Trust would prepare a management and remediation plan for lead-based paint to reduce impacts of lead-based paint contamination to acceptable levels. All workers involved in lead abatement would follow required procedures to protect themselves and family members from exposure. Warning signs would be posted to mark the boundaries of lead-contaminated work areas. These signs would warn about the lead hazard, prohibit eating, drinking and smoking in the area, and specify any protective equipment required. Workers would use all necessary personal protective clothing and respiratory equipment during removal. During removal, all safety measures would be followed to prevent any contamination outside the removal area. Air purification and air monitoring equipment would be in operation during removal in interior areas. All waste lead-contaminated materials would be placed in approved labeled waste collection receptacles. Waste lead would be properly transported under strict adherence to EPA/RCRA, DOT, and state and local regulations by a licensed hazardous waste hauler to an approved waste site. All necessary shipping documents would be prepared prior to any shipments.

HH-3. *Contingency Plan* – Prior to the initiation of subsurface construction within the Letterman Complex, the Presidio Trust would develop a Contingency Plan to provide a decision framework to address the potential for unidentified contamination discovered during construction activities. The plan would allow the Presidio Trust and its contractors to manage identified contaminants in a timely manner that is protective of human health and the environment. The plan would provide a discussion of the project, applicable regulatory requirements for the contingency activities, appropriate cleanup levels, notification/coordination requirements and plan approval process. The Presidio Trust would coordinate with the applicable regulatory agencies to obtain their concurrence regarding the proposed approach to the plan. Additionally, the Presidio Trust would coordinate with and provide review opportunities for the Presidio Restoration Advisory Board.



This section summarizes the Presidio Trust's public involvement efforts, including the preferred alternative selection process, consultation with public agencies, and compliance with relevant environmental review laws and executive orders. Lists of preparers and recipients are also provided.

5.1 History of Public Involvement

After assuming the planning process for the Letterman Complex from NPS, the Trust, in keeping with its Public Outreach Policy, designed a thorough public involvement process for the development to fully satisfy the public participation requirements of NEPA.

5.1.1 THE TRUST'S PUBLIC OUTREACH POLICY

Since it first formed in 1997 and started operations with only a handful of employees, the Trust has endeavored to build regular opportunities for public input into its daily operations. Early in its organizational life, in response to Section 103(c)(6) of the Trust Act, which requires the Trust Board to establish "procedures for providing public information and opportunities for public comment regarding policy, planning, and design issues," the Trust Board established the Trust's Public Outreach Policy. That policy, adopted at the first meeting of the Board on July 7, 1997 (Board Resolution No. 97-3) and later expanded on March 17, 1998 under Board Resolution 98-16, encourages members of the general public to make their views known to the Trust. The Trust encourages public comment to be made directly in writing, by phone, or at a variety of public meetings. In addition, the Trust is authorized under Section 10(c)(6) of the Trust Act to provide opportunities for public comment through the Golden Gate National Recreation Area Citizens Advisory Commission, which it has done repeatedly throughout the project.

Community outreach related to the proposed project has included opportunities for public input at every step of the process. The Trust has actively sought public input on the Financial Management Program that served to determine the bounds of the proposed, on the Request for Qualifications (RFQ) and Request for Proposals (RFP) seeking prospective users/tenants for the 23-acre site, and on the development of the Planning Guidelines to ensure new construction at the site conforms with the National Historic Landmark status. All of this input has been in addition to meeting the public participation requirements of NEPA, including consideration of public comment on the Draft EIS and consultation with other federal and state agencies.

5.1.2 COMMUNITY OUTREACH ON THE FINANCIAL MANAGEMENT PROGRAM

The FMP, finalized in July 1998, sets forth the financial forecasts for the proposed project (see Section 1.2.2). To provide the public with opportunities to learn about and comment on the FMP, the Trust held a series of public meetings beginning with initial presentation of the draft program at a joint meeting of the Presidio Trust Board of Directors and the GGNRA Citizens Advisory Commission on April 27, 1998. This meeting received local and national media coverage. The Trust conducted additional meetings on May 27, June 2, and June 8, 1998. In addition to hosting the public workshops, the Presidio Trust staff presented the FMP to more than twenty neighborhood, community, civic, and business groups — an aggregate of approximately 1,000 interested citizens. The presentations noted that development and uses at the Letterman Complex, including demolition of the existing medical center and research institute and construction of new buildings, as a key contributor to

achievement of financial self-sufficiency. On June 10, 1998 the GGNRA Advisory Commission voted unanimously to approve a resolution supporting the FMP.

5.1.3 COMMUNITY OUTREACH DURING RFQ/RFP PROCESS

The Trust held a series of public workshops related to the Letterman Complex RFQ/RFP and tenant selection. In order to facilitate public input regarding the range of potential uses currently being considered for the 23-acre site, the Trust held a series of public meetings during the RFQ response period (August 14, 1998 through October 12, 1998), beginning with workshops on August 25, 1998 and September 3, 1998. A front-page article describing the RFQ process for the 23 acres was also featured in the September 1998 issue of the *Presidio Post*, the monthly publication of the Presidio Trust. In addition, on September 2, 1998, the Trust held a pre-submittal conference for prospective RFQ respondents to learn more about the lease opportunity. On October 14, 1998, the Trust gave a report on the RFQ and related public outreach to the GGNRA Advisory Commission.

To provide the public with opportunities to comment on the proposals received prior to the March 1, 1999 deadline responding to the Letterman Complex RFP, the Trust hosted three workshops. At two meetings on March 24, 1999 (in the morning with the Trust Board of Directors, and in the evening with Trust staff), and again on April 6, 1999, the four respondent teams presented their proposals and the public was offered an opportunity to comment. Videotapes of the teams' presentations, as well as their written proposals, have been available for public review in the Trust library, and the news media gave extensive coverage to the four team presentations.

In addition to these workshops, the Trust arranged and participated in numerous informal public sessions to provide information and gather comments. The Trust arranged an informal open house on March 30, 1999 for the Presidio community to meet the four teams. In addition, during March through May 1999, Trust staff and representatives of respondent teams were present to discuss and answer questions about the proposals at public meetings of the Cow Hollow Neighbors in Action; Cow Hollow Association of Neighbors; Neighborhood Associations for Presidio Planning (NAPP); Presidio Alliance; and San Francisco Planning and Urban Research. The Trust gave regular updates to the public in the *Presidio Post* and at meetings of the GGRNA Advisory Commission and Presidio Committee, Presidio Tenants' Council, Presidio Residential Mayors, NAPP, People for the Presidio, and various civic and business groups.

The Trust estimates that 1,500 people have participated in and offered comment during these public meetings sponsored by the Trust, and the Trust has received and considered more than 300 letters regarding the reuse of the 23-acre site within the Letterman Complex.

5.1.4 COMMUNITY OUTREACH PRIOR TO EIS PUBLICATION

Concurrent with public outreach as part of the leasing process has been the Trust's public outreach in connection with the EIS itself and the NEPA process. The Presidio Trust published notice of its intent to prepare the Draft EIS in the Federal Register on December 24, 1998. The Trust held a public meeting on January 27, 1999 to elicit comment regarding the alternatives and the environmental issues requiring further analysis in the Draft EIS. At the meeting, written comments were also encouraged. The Trust provided feedback to the commentors as to the matters raised at the meeting and in letters in a front-page article of the March 1999 issue of the *Presidio Post* and through a direct mailing, which also announced the upcoming

release of the Draft EIS for public comment. The following is a summary of the comments made during the public workshop:

Project Scope – There was strong consensus that the impacts of new development on the 23-acre site should be considered in the context of both the 60-acre Letterman Complex and the Presidio as a whole.

Potential Uses and Programs – The project should be in keeping with the character of the Presidio as a national park. New uses should support themes identified in the 1994 General Management Plan Amendment to the extent possible, including reuse of a portion of the buildings. Concern was raised about nighttime activities and programs and their potential effects.

Views, Open Space and Access – Open space in the project should be accessible to the public and to neighbors. Green space, vegetation buffers and views should be maintained. Important views should be protected.

Design Compatibility – Concerns were expressed about the size, scale, and density of buildings on the 23-acre site. New construction must be compatible with both the adjacent historic hospital complex and adjacent neighborhoods. The park-like character should be retained.

Transportation, Traffic and Circulation – Neighbors expressed concern about traffic and parking impacts during construction and building occupancy. Convenient pedestrian access within and to the surrounding areas should be created.

Parking – There was consistent agreement about reducing surface parking and preventing parking from spilling into adjoining neighborhoods. Sufficient parking, including underground parking, is desirable but should not be so abundant as to impede programs to reduce automobile use.

Water – Concern was expressed about the adequacy of the Presidio water supply to provide water to the new facilities. Water conservation measures were recommended.

Housing – Many participants wanted to know more about rental rates of any proposed housing that would be incorporated into the 23-acre site. Affordability for entry level employees was favored by many. It was agreed that providing onsite housing would reduce employee commuting.

Community Services – Some participants felt retail operations would compete with existing businesses. Others felt this would support Presidio residents and be a convenience for surrounding neighbors.

Sustainability – Arguments were made that any new buildings on the site should be designed to adapt to future change of uses over time. Achieving environmentally sustainable goals on the 23-acre site was important.

5.1.5 PUBLIC COMMENT PERIOD FOR THE DRAFT EIS

The Presidio Trust released the Draft EIS for public review and comment on April 19, 1999. Notice of the availability of the Draft EIS was provided in the Federal Register and local news media, and through direct mailing, flyers to owners and occupants of nearby property, posting on the Presidio Trust's website (www.presidiotrust.gov) and an update in the Trust's monthly *Presidio Post* publication. The dates of public hearings were included within the notice of availability and within each copy of the Draft EIS. Approximately

325 copies of the Draft EIS were distributed to public interest groups and individuals. The Draft EIS was also made available for review on the Presidio Trust's website and at the Presidio Trust library, park headquarters and local libraries, and a local photocopy shop. Additional documents were also released to accompany the Draft EIS, including the GMPA and GMPA EIS (NPS 1994a) and the *Letterman Complex Transportation Technical Report* (Wilbur Smith Associates 1999).

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

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

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

The Presidio Trust responded to all substantive public comments according to the requirements of 40 CFR 1503. Some comments called for clarification of information in the Draft EIS and Draft Planning Guidelines. Other comments required text modifications, which have been made in the Final EIS and Final Planning Guidelines and identified in the Presidio Trust's responses. No responses are provided to comments that merely expressed opinions and did not identify a question or a needed text clarification, correction, or modification. Although responses are not required on comments that simply expressed support for the Presidio Trust's

preferred alternative or for one of the other alternatives, all comments have been taken into account in preparing the Final EIS, and will be considered by the Trust in reaching its final decision.

5.1.6 PUBLIC INVOLVEMENT IN DESIGN REVIEW

In addition to the environmental analysis required as part of the NEPA process, of central importance to ensuring that new construction at the 23-acre site conforms with the National Historic Landmark status is the Trust's compliance with the National Historic Preservation Act (NHPA). To satisfy the NHPA, the Trust will develop Design Guidelines for new construction in consultation with the State Historic Preservation Office (SHPO) and Advisory Council on Historic Preservation (ACHP). Although not required under NEPA, early in the planning process for the Letterman Complex, the Trust integrated opportunities for public input on development of the Planning Guidelines into the NEPA decision-making process. Preparation of the Planning Guidelines began in January 1999, with assistance from NPS technical staff. The Trust presented a draft outline for the Planning Guidelines at a January 27, 1999 public scoping workshop. When the Trust published the Draft EIS, it included the Draft Planning Guidelines (Appendix B), and received additional public comment through that review process.

An initial draft of the Design Guidelines, as a follow-on to the Planning Guidelines, that address architectural and landscape issues for new construction, were then posted on the Presidio Trust's web-site and made available to the public on December 6, 1999. The Trust held a public workshop on the preliminary Design Guidelines on December 13, 1999 and received public comment on them until December 27, 1999.

The Final Planning Guidelines are included in the Final EIS in Appendix B. The Design Guidelines for new construction, which are still under development and must be submitted to the SHPO for review and comment as part of the NHPA's Section 106 consultation process, will incorporate the Final Planning Guidelines that have been publicly reviewed and finalized under this EIS.[1]

5.2 The Preferred Alternative Selection Process

An aspect of the Trust's process with respect to the Letterman Complex EIS that caused a great deal of public confusion was the preferred alternative selection process. It was commonly perceived that the Trust had made a final selection before the public comment period had closed on the Draft EIS and well before the NEPA process had been completed. That, however, is not so. In an attempt to keep the public fully informed during the highly charged and heavily scrutinized RFQ/RFP process for the Letterman Complex, the Trust communicated certain information that may have been initially misleading and the problem was then compounded by inaccurate media coverage.

In keeping with the Trust's Public Outreach Policy, as early as August 1998, the Trust instituted a practice of issuing press releases and monthly newsletter articles as a means to keep the public fully informed on the status of the project. On August 14, 1998, the Trust issued its first press release for the Letterman Complex announcing the publication of the RFQ and the opportunity to lease almost one-third of the Presidio's non-

[1] See Section 1.4 for more complete discussion of the relationship of Planning and Design Guidelines to the proposed project.

residential building space. In a series of nine press releases, the Trust periodically updated the status of the project.

After the Trust announced on January 5, 1999 the shortlist of four development teams who had been invited to present more detailed proposals for the 23-acre site, the atmosphere of competition among the development teams grew increasingly intense. An aspect of the competitive atmosphere was an aggressive and expensive public relations campaign by each development team designed to persuade the public to favor one team over another. Pressure on the Trust grew to chronicle and publicize any and every increment of progress toward selection of a preferred alternative in order to quell the public relations spending.

Toward this end, a potentially confusing press release on May 3, 1999 announced that the Trust had "preliminarily narrowed its focus to two finalists . . .." While it went on to state that the Trust would continue its comprehensive review of all development team submittals and could still look to the other remaining teams, the release did not clearly state that the announcement was part of the Trust's process for identifying a preferred alternative under NEPA.[2] A second press release on May 26, 1999 corrected the first, stating that the Trust Board of Directors was continuing its deliberations about the preferred alternative for the 23-acre site. Nevertheless, after a number of printed reports incorrectly characterized the identification of the preferred alternative as a final decision, the Trust issued another press release on June 14, 1999. Although this release confirmed that all alternatives analyzed in the Draft EIS for the Letterman Complex remained viable, it too created further confusion by announcing the start of preliminary negotiations with the proponent of the preferred alternative. Although the Trust attempted to but could not control the oversimplification of the process by the press, because of the confusion generated, the Trust, after consultation with the U.S. EPA, elected to extend the public comment period on the Draft EIS for an additional 45 days.

In extending the public comment period, the Trust made clear that in identifying Lucasfilm's Letterman Digital Arts Ltd. (LDA) as the proponent of the preferred alternative under the EIS with whom the Trust would begin exclusive negotiations, no final decisions or binding commitments were being made. The Trust was not precluding the selection of any of the other alternatives, merely indicating the one that in the Trust's judgment would best fulfill its statutory mission and responsibilities subject to the completion of the NEPA process. No final commitments will be made until after the Record of Decision under this EIS is complete. Exploratory negotiations have begun with the proponent only to test the willingness to adhere to the maximum extent to the Planning Guidelines and to the project's purpose and need. Despite these early discussions, no actions have been taken or commitments made that prevent the Trust from ultimately using one of the alternative scenarios or which otherwise irreversibly commits the Trust to accept LDA's proposal. If there were any problems with proceeding with LDA's proposal, whether environmental concerns or unrelated logistical disagreements, the Trust would be free to begin discussions with other development teams pursuant to this same EIS. Accordingly, contrary to any perception otherwise, the Trust has made no final decision before having completed the NEPA process for the Letterman Complex project being studied in this EIS.

[2] A "preferred alternative" is "the alternative which the agency believes would fulfill its statutory mission and responsibilities, giving consideration to economic, environmental, technical, and other factors" (Forty Questions No. 4a: CEQ 1981). CEQ's NEPA regulations provide that an agency shall "identify the agency's preferred alternative or alternatives, if one or more exists, in the draft statement and identify such alternative in the final statement." 40 C.F.R. 1502.14(e).

5.3 Public Agency Consultation

Prior to preparation of the Draft EIS, through direct mailing and follow-up presentations, the Presidio Trust solicited the input of public agencies and Indian tribes listed in Section 5.6 as to their views on any environmental impact in connection with the project (Presidio Trust 1998c). Of the 37 agencies and eight Indian Tribes invited to comment, nine agencies responded. The following is a summary of the comments received during the early consultation.

5.3.1 DEPARTMENT OF THE ARMY, HEADQUARTERS, I CORPS AND FORT LEWIS, BASE REALIGNMENT AND CLOSURE (BRAC) ENVIRONMENTAL OFFICE

The agency maintains that it has no statutory responsibilities in connection with the project because base closure–related remedial activities were completed in the LAMC/LAIR footprint several years ago, and no other U.S. Army environmental actions are required (U.S. Army 1999).

5.3.2 DEPARTMENT OF THE ARMY, SAN FRANCISCO DISTRICT, CORPS OF ENGINEERS

The agency determined that the project would not involve any areas within Corps jurisdiction and would not require a permit from the Corps (U.S. Army Corps of Engineers 1999).

5.3.3 DEPARTMENT OF THE INTERIOR, NATIONAL PARK SERVICE, GOLDEN GATE NATIONAL RECREATION AREA

The NPS urged the Presidio Trust to work cooperatively with its staff and the community to develop an appropriate strategy for adapting the GMPA to changing circumstances while maintaining its vision. The agency also requested that the Draft EIS include additional information within the following impact topics: consistency with approved plans and policies; geology and earthquakes; water quality/storm drainage/wetlands; city services (water supply and distribution, wastewater treatment, law enforcement services, fire protection and emergency medical services); housing; traffic and transportation systems; land use in the Presidio community and surrounding neighborhoods; National Historic Landmark district; special status species; noise; and recreation. Each of these issues was addressed in the Draft EIS, either by in-depth analysis or through further examination of the concerns in Appendix A. Pursuant to interagency agreement, the NPS is considered a cooperating agency for the purposes of this NEPA analysis (NPS 1999i).

5.3.4 U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION IX OFFICE

The agency had no formal comments but reviewed preliminary sections of the Draft EIS and suggested additional alternatives to be considered in the Draft EIS. The agency also recommended that the Presidio Trust give formal notice of the preferred alternative and extend the public comment period upon making its selection following release of the Draft EIS, which was done.

5.3.5 CALIFORNIA DEPARTMENT OF HEALTH SERVICES

The agency requested that the Draft EIS include information regarding the disposition of radioactive materials at the medical center and research institute (California Department of Health Services 1999). In 1993, the Nuclear Regulatory Commission completed confirmatory radiological surveys of the LAMC and LAIR as part of its termination process. Licenses for radioactive materials were held for buildings 1006, 1007, 1010, 1011, 1012, 1013, 1014, 1057, 1059, 1100 and 1110. These surveys documented contamination issues, confirmed that

such contamination had been remedied to Nuclear Regulatory Commission standards, and determined that the surveyed facilities are suitable for unrestricted use (U.S. Army 1993a, Berger 1993, Vitkus 1993). This information has been included in Section Y, Human Health, Safety and the Environment in Appendix A of the EIS.

5.3.6 CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL

The agency requested that the potential for a hazardous substance or hazardous waste release should be discussed in the Draft EIS (California Department of Toxic Substances Control 1999). Any evidence of hazardous substance or hazardous waste releases identified during demolition and construction activities would be properly addressed pursuant to applicable statutes. Measures that would be taken to address any hazardous substances encountered during demolition and construction activities are described in Section 4.0.

5.3.7 CALIFORNIA DEPARTMENT OF WATER RESOURCES

The agency expressed no concerns related to the proposed project because it would not include development within a floodplain or impact bay water quality (California Department of Water Resources 1999).

5.3.8 CITY AND COUNTY OF SAN FRANCISCO DEPARTMENT OF PARKING AND TRAFFIC

The agency reviewed plans for the modified configuration at the intersection of Lyon Street, Richardson Avenue and Gorgas Avenue and generally concurred with the plans. The agency suggested a level of service analysis to determine the impact of the schemes on through traffic and recommended coordination with the Palace of Fine Arts/Exploratorium (City and County of San Francisco, Department of Parking and Traffic 1999e).

5.3.9 CITY AND COUNTY OF SAN FRANCISCO DEPARTMENT OF PUBLIC WORKS

The agency requested that the Draft EIS include information on the abatement of hazardous materials and contingency plans for activities in the Presidio (City and County of San Francisco, Department of Public Works 1999c).

5.4 Compliance with Relevant Environmental Review Laws and Executive Orders

5.4.1 CLEAN WATER ACT

The Clean Water Act is a 1977 amendment to the Federal Water Pollution Control Act of 1972, which set the basic structure for controlling pollutants in storm-water runoff discharges. The Clean Water Act requires that a National Pollutant Discharge Elimination System permit be obtained for construction projects that disturb an area greater than 5 acres. The permit requires development, implementation and compliance monitoring of a storm water pollution prevention plan that prescribes best management practices to control erosion and runoff during construction. The selected development team for the 23-acre site would comply with these provisions prior to commencement of construction activities.

5.4.2 CLEAN AIR ACT

The federal Clean Air Act requires a conformity determination for proposed federal actions within locations that are designated as nonattainment or maintenance areas. The San Francisco Bay Area is designated as a moderate nonattainment area for ozone and a maintenance area for carbon monoxide. General federal actions that cause direct and indirect emissions beyond the emission thresholds set forth in 40 CFR 51.853 are required to complete a conformity determination. The pollutants of concern are ozone (and its precursors, i.e., volatile organic compounds and oxides of nitrogen) and CO. Particulates are not of concern because the Bay Area is in attainment of the federal particulate standards.

As discussed in Section 3.11.2, a federal conformity analysis evaluates whether a proposed action conforms to the State Implementation Plan for a particular pollutant.[3] A conformity analysis is not necessary at this time for three reasons. First, the proposed alternatives for the Letterman Complex fall within the development envelope already approved as part of the 1994 GMPA. No alternative now under consideration would result in the exceedance of the 1.3 million allowable square footage for the complex. Furthermore, the estimated vehicle trips from the six alternatives now under consideration are less than the maximum trips under the proposed action (Alternative A) considered in the 1994 GMPA EIS (Wilbur Smith Associates 1999). Therefore, the 1994 GMPA EIS already considered a greater amount of emissions than any of the currently proposed alternatives.

Second, the current maintenance plan for CO includes population and employment estimates for a populated Presidio. The current maintenance plan for CO in the Bay Area Air Basin is embodied in the *Proposed Carbon Monoxide Redesignation Request and Maintenance Plan for Ten Federal Planning Areas* (CO Maintenance Plan) (California Air Resources Board 1996). Although ABAG's Projections '96 may have assumed that the Army had vacated and no substantial uses would replace the Army (personal communication with Hing Wong, Regional Planner, ABAG), the projections used as a basis for the CO Maintenance Plan were based upon earlier ABAG projections, either from 1994 or 1992. These earlier projections included the U.S. Army's use of the Presidio, and consequently, had higher employment figures.

The proposed alternatives for the 23-acre site would cause emissions of ozone precursors that fall below the thresholds set forth in the federal regulations. No conformity determination is required for projects emitting less than these amounts. This means that proposed development under any of the alternatives currently under consideration is included within the relevant plans prepared to meet or maintain federal air quality standards, and the alternative selected by the Presidio Trust would be in conformance. No further conformity analysis is necessary.

In the jurisdiction of the BAAQMD, construction emissions are included in the emissions inventory that is the basis for regional air quality plans and are not expected to impede attainment of air quality standards.

[3] The thresholds from the federal regulations are as follows. Regarding carbon monoxide, the Bay Area is designated as a maintenance area; therefore, the threshold is 100 tons/year (or 548 lb/day) (40 CFR §51.853(b)(2)). Regarding ozone, the U.S. EPA Region IX Administrator changed the Bay Area's classification for the federal one-hour ozone standard from a "maintenance area" to an "unclassified nonattainment area," effective August 10, 1998. The threshold is 100 tons per year (or 548 lb/day) for ozone precursors for an "unclassified nonattainment area" (40 CFR §51.853(b)(1)). As shown in Table 22, the emissions of ozone precursors fall below the 100 tons per day threshold. Therefore, no conformity determination is required regarding ozone precursors.

5.4.3 NATIONAL HISTORIC PRESERVATION ACT

Under Section 106 of the National Historic Preservation Act, federal agencies are required "to take into account the effect" of a project such as new development and uses on the 23 acres within the Letterman Complex and to provide the Advisory Council on Historic Preservation (ACHP) a "reasonable opportunity to comment with regard to" such a project. The Council has issued regulations appearing at 36 CFR Part 800 that detail how an agency such as the Presidio Trust may comply with the mandate of Section 106. Pursuant to these regulations, the Presidio Trust has been engaged in extensive consultation with the California State Historic Preservation Office and the ACHP regarding Section 106 compliance at the entire 60-acre Letterman Complex. The Presidio Trust has also received input and comment from a variety of other organizations. The result of this process has been the production of a Programmatic Agreement (as provided in Appendix F) under Section 800.14 of the ACHP's regulations. Implementation of the Programmatic Agreement will satisfy the Presidio Trust's Section 106 obligations (see Section 1.4 for a more complete discussion of the Trust's NHPA compliance activities).

5.4.4 ENDANGERED SPECIES ACT

Section 7 of the Endangered Species Act directs all federal agencies to further the purposes of the act. Federal agencies are required to consult with the U.S. Fish and Wildlife Service (USFWS) to ensure that any action authorized, funded or carried out by the agency does not jeopardize the continued existence of listed species or critical habitat. Because none of the alternatives would adversely affect any federally listed or candidate species or critical habitat, no formal consultation with USFWS is required.

5.4.5 EXECUTIVE ORDER 11988 (FLOODPLAIN MANAGEMENT), EXECUTIVE ORDER 11900 (PROTECTION OF WETLANDS) AND THE FISH AND WILDLIFE COORDINATION ACT (FWCA)

Executive Orders 11988 and 11990 direct federal agencies to enhance floodplain and wetland values, to avoid development in floodplains and wetlands whenever there is a practical alternative, and to avoid to the extent possible adverse impacts associated with the occupancy or modification of floodplains and wetlands. Development within the Letterman Complex would be compatible with these executive orders. The Fish and Wildlife Coordination Act provides the basic authority for USFWS review of water resources development projects. No "waters or channel of a body of water" would be modified during development within the Letterman Complex.

5.4.6 ENVIRONMENTAL JUSTICE: EXECUTIVE ORDER 12898

Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," provides that "each federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations." In the memorandum to heads of departments that accompanied this Executive Order, the President emphasized the importance of NEPA's public participation process in achieving environmental justice goals.

Based on the 1990 Census, the distribution of population within the city of San Francisco was as follows: 47 percent White, 29 percent Asian, 13 percent Hispanic, 11 percent Black and 1 percent Other (Table 25). The median household income in San Francisco was $40,561 in 1989 based on the 1990 Census. The population distribution within the census tracts that surround the Presidio ranges from nearly 90 percent white to just under 49 percent white. Median household incomes in these tracts range from a high of over $200,000 to a low of

$32,344. Given this information, the neighborhoods that surround the Presidio cannot be characterized as predominantly minority or low-income.

None of the alternatives would create any adverse impacts on minority or low-income communities. Rather, the action alternatives would expand recreational and educational opportunities for these communities, as well as for the general population.

Table 25
Demographics of Neighborhoods Surrounding the Presidio (1990 Census)

CENSUS TRACT	TOTAL POPULATION	PERCENT WHITE	PERCENT BLACK	PERCENT AMERICAN INDIAN/ESKIMO/ALEUT	PERCENT ASIAN/ PACIFIC ISLANDER	PERCENT HISPANIC	PERCENT OTHER	1989 MEDIAN HOUSEHOLD INCOME
City of San Francisco	723,959	46.81	10.63	0.36	28.66	13.35	0.19	$40,561
06075012600	4,284	87.89	0.68	0.16	7.28	3.94	0.05	$40,018
06075012700	2,617	87.31	0.42	0.27	8.06	3.90	0.04	$38,290
06075012800	4,117	87.03	0.92	0.12	8.40	3.45	0.07	$50,568
06075013200	4,320	88.29	0.67	0.07	7.31	3.47	0.19	$65,738
06075013300	4,048	83.57	2.62	0.22	9.46	3.95	0.17	$58,039
06075013400	3,633	82.30	5.75	0.17	7.38	4.29	0.11	$48,774
06075015300	2,009	62.02	22.45	0.25	10.70	4.58	0.00	$42,100
06075015400	5,453	62.00	9.06	0.28	23.69	4.84	0.13	$34,255
06075040100	4,334	52.33	2.15	0.21	39.87	5.33	0.12	$32,344
06075040200	5,340	51.80	1.25	0.24	42.98	3.52	0.21	$37,303
06075042600	6,943	50.64	1.57	0.23	42.45	5.00	0.12	$36,250
06075042700	5,262	48.75	2.07	0.40	43.29	5.28	0.21	$33,110
06075042800	2,457	78.47	0.57	0.16	17.30	3.30	0.20	$82,292
06075060200	11	54.55	0.00	0.00	45.45	0.00	0.00	$200,000

Source: BAE

5.5 List of Preparers

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Chandler McCoy, Planner, Presidio Trust, B.S., Architecture; M., Architecture

John Miller, Associate, Bay Area Economics, B.A., Economics

Amy Marshall, Transportation Planner, Wilbur Smith Associates, B.S., Civil Engineering; M.S., Transportation Engineering

Sowmya Parthasarathy, AICP, Planner, SMWM, B.A., Architecture; M., Urban Design

Richard Tilles, Transportation Manager, Presidio Trust, B.C.E., Civil Engineering; M.S., Urban Planning

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5.5.2 CONTRIBUTORS

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Kathleen Diohep, Financial Analyst, Presidio Trust

Joanne Marchetta, Assistant General Counsel, Presidio Trust

Michael Painter, Landscape Architect, MPA Design

Maurice Palumbo, Principal Planner, Golden Gate Bridge Highway and Transportation District

Sharron Reackhof, Environmental Remediation Manager, Presidio Trust

Anita Roberts, Leasing Assistant, Presidio Trust

Barbara W. Sahm, Senior Associate, EIP Associates

David Shiver, Principal, Bay Area Economics

Aimee Vincent, Sustainability Coordinator, Presidio Trust

5.5.3 PERSONS CONSULTED

Darice Bailey, Senior Health Physicist, California Department of Health Services

Leo Barker, Archeologist, NPS, GGNRA

Kristin Baron, Architectural Historian, NPS, GGNRA

Ric Borjes, Chief, Branch of Cultural Resources, NPS, GGNRA

Michael Foster, Captain, United States Park Police Field Office, Administrative Section, NPS, GGNRA

Alice Glasner, Planner, Major Environmental Analysis Section, Department of City Planning, City and County of San Francisco

Beth Goldstein, Hydraulic Planning Group

Susan Hall, Landscape Architect, formerly with NPS, GGNRA

Steve Haller, Historian, NPS, GGNRA

Daphne A. Hatch, Wildlife Specialist, NPS, GGNRA

John Knudsen, Regulatory Branch, Department of the Army, Corps of Engineers, San Francisco District

David Lindsey, Planner and Team Leader, Northwest Quadrant, San Francisco Planning Department

Paul Lineberry, Landfill Engineer, Zanker Road Landfill

Bill Oswald, Fire Chief, Presidio Fire Department

Maurice Palumbo, Principal Planner, Golden Gate Bridge, Highway and Transportation District

Leonidas Payne, NEPA Coordinator, Environmental Protection Agency, Region IX Office

Wendy Poinsot, Environmental Protection Specialist, NPS, GGNRA

Michelle Rios, Architect, NPS, GGNRA

Jerry Robbins, Transportation Planner, City and County of San Francisco, Department of Parking and Traffic

Christy Rocca, Director of Programs, Crissy Field Center, Golden Gate National Parks Association

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Nick Weeks, Landscape Architect, NPS, GGNRA

Margaret Wells, Program Director, Education Placement Center, SFUSD

Diane Wong, Planner, Major Environmental Analysis Section, Department of City Planning, City and County of San Francisco

Hing Wong, Regional Planner, Association of Bay Area Governments (ABAG)

Paul Yamamoto, Alameda County Division Manager, Waste Management, Inc.

5.6 List of Recipients

The list of agencies and organizations to whom copies of the Draft EIS and Final EIS were sent is provided below. The complete list of recipients (including individuals) who were provided notice of the documents' availability can be reviewed at The Presidio Trust, 34 Graham Street, P.O. Box 29052, San Francisco, CA 94129-0052.

5.6.1 FEDERAL AGENCIES

Department of the Army

- Corps of Engineers, San Francisco District Headquarters, I Corps and Fort Lewis, BRAC Environmental Office

Department of Commerce

- National Oceanic and Atmospheric Administration, National Marine Fisheries Service

Department of Energy

- San Francisco Support Office

Department of the Interior

- Bureau of Indian Affairs
- Fish and Wildlife Service, Sacramento Fish and Wildlife Office
- National Park Service, 1) Superintendent, Golden Gate National Recreation Area; 2) Presidio General Manager; 3) Regional Director, Pacific West Region
- Office of Environmental Policy & Compliance

Department of Transportation

- Federal Highway Administration, California Division Office
- Federal Transit Administration, Region 9

U.S. Environmental Protection Agency

- Region IX Office

5.6.2 FEDERAL ADVISORY GROUPS

Advisory Council on Historic Preservation

- Office of the Executive Director, Western Office of Planning and Review

Golden Gate National Recreation Area Citizens Advisory Commission

National Parks Advisory Board

5.6.3 STATE AGENCIES

Department of Education

Department of Health Services

Department of Transportation

- District 4

Environmental Protection Agency

- Department of Toxic Substances Control, Chief, Northern California Operations
- Office of the Secretary

Governor's Office of Planning and Research

- Chief, State Clearinghouse

Resources Agency

- Department of Conservation, Office of Governmental and Environmental Relations
- Department of Fish and Game

Department of Parks and Recreation

- Office of Historic Preservation, Acting State Historic Preservation Officer
- Office of Historic Preservation, Chief, Review and Compliance Unit

District Superintendent, Bay Area District Headquarters

Department of Water Resources, Chief, Environmental Review Unit

State Water Resources Control Board

Regional Water Quality Control Board, San Francisco Bay Region

5.6.4 REGIONAL, COUNTY AND MUNICIPAL AGENCIES

Bay Area Air Quality Management District

City and County of San Francisco

Department of Parking and Traffic

Department of Planning

Department of Public Works

Municipal Railway, Planning Division

Public Utilities Commission, Systems Planning and Regulatory Compliance

Golden Gate Bridge, Highway and Transportation District

Metropolitan Transportation Commission

San Francisco Bay Conservation and Development Commission

San Francisco Unified School District

5.6.5 AMERICAN INDIAN TRIBES

Amah Band of Ohlone/Costanoan Indians

Costanoan Band of Carmel Mission Indians

Costanoan Ohlone Rumsen-Mutsun Tribe

Costanoan-Rumsen Carmel Tribe

Federated Coast Miwok

Indian Canyon Band of Costanoan/Mutsun

Muwekma Indian Tribe

The Ohlone Indian Tribe

5.6.6 LIBRARIES

Marin Community Library

San Francisco Main Library

San Francisco Presidio Branch Library

San Francisco State University Library

5.6.7 ORGANIZATIONS

American Institute of Architects, San Francisco Chapter

American Planning Association, Northern California Chapter

American Society of Landscape Architects, San Francisco Chapter

Audubon Society, Golden Gate Chapter

Bicycle Community Project

California Historical Society

California Native Plant Society, Bay Chapter

Coalition of San Francisco Neighborhoods

Cow Hollow Association

Cow Hollow Neighbors in Action

Exploratorium

Fort Mason Foundation

Fort Point Historical Society

Fort Point and Presidio Historical Association

Golden Gate National Parks Association

Hotel Employees and Restaurant Employees Union

League of Women Voters, San Francisco

Marina Civic Improvement and Property Owners Association

National Parks and Conservation Association

National Trust for Historic Preservation

Natural Resources Defense Council

Neighborhood Association for Presidio Planning

Pacific Heights Resident Association

People for a Golden Gate National Recreation Area

People for the Presidio

Planning Association for the Richmond

Preserve the Presidio Campaign

Presidio Alliance

Presidio Heights Association of Neighbors

Residential Mayors

San Francisco Beautiful

San Francisco Chamber of Commerce

San Francisco Planning and Urban Research Association

San Francisco Tomorrow

Sierra Club, Bay Chapter, Presidio Task Force

Tenants Council Steering Committee

West Presidio Neighborhood Association

Wilderness Society

Association of Bay Area Governments (ABAG)

1998 *Projections 1998*.

Backen, Arrigone & Ross, Inc. (BAR)

1993 *Letterman Complex Assessment.*

BAE see *Bay Area Economics*

Bay Area Air Quality Management District (BAAQMD)

1996 *BAAQMD CEQA Guidelines: Assessing the Air Quality Impacts of Projects and Plans.* San Francisco, CA.

1997 *1997 Clean Air Plan and Triennial Assessment.*

Bay Area Bioscience Center

1998 *A Profile of the Regional Bioscience Industry*.

Bay Area Council

1999 *Bay Area Water Transit Initiative Action Plan: Bay Area High-Speed Water Transit System for the 21st Century.* In cooperation with the Bay Area Economic Forum. Dated May 1999. San Francisco, CA.

Bay Area Economics (BAE)

1998a *Draft Lobos Creek Water Resources Management Issues Brief.*

1998b *Presidio Housing Technical Report, June 4, 1998.*

1999 *Park Police Impacts (table).*

2000 *Cumulative Projections for the Letterman Complex Final EIS.*

Berger, J.D.

1993 *Confirmatory Radiological Survey for Selected Facilities at Letterman Army Medical Center, Presidio of San Francisco, California. Final Report* (May 1993). Oak Ridge Institute for Science and Education. Prepared for U.S. Nuclear Regulatory Commission, Region V Office. Oak Ridge, TN.

Bolt, Beranek, and Newman

1971 *Noise from Construction Equipment and Operations, Building Equipment and Home Appliances.* Prepared for the U.S. Environmental Protection Agency.

California Air Resources Board

1996 *Proposed Carbon Monoxide Redesignation Request and Maintenance Plan for Ten Federal Planning Areas.*

1997 *Summary of 1997 Air Quality Data*

California Department of Conservation, Division of Mines and Geology

1997 *Guidelines for Evaluating and Mitigating Seismic Hazards in California*. DMG Special Publication 117. Adopted March 13, 1997 by the State Mining and Geology Board in accordance with the Seismic Hazards Mapping Act of 1990. Sacramento, CA.

California Department of Conservation, Office of Governmental and Environmental Relations

1998 *Letter to Brian O'Neil, Superintendent, GGNRA.* Dated November 6. Subj.: Geology and Seismology Comments – Draft EIS, Fort Baker, GGNRA, Marin County, SCH # 98104016. Sacramento, CA.

California Department of Finance

1998 *Table E-5, California Demographic Estimates by Jurisdiction.*

California Department of Health Services

1999 *Electronic Correspondence from Darice G. Bailey, Senior Health Physicist*. Subject: Letterman Complex. Dated January 12, 1999.

California Department of Toxic Substances Control

1999 *Letter from Anthony J. Landis, Chief, Northern California Operations to Mr. John Pelka, NEPA Compliance Coordinator, Presidio Trust*. Dated February 9, 1999. Sacramento, CA.

California Department of Transportation (Caltrans)

1993 Caltrans Project Study Report

California Department of Water Resources

1999 *Electronic Mail from Nadell Gayou, Chief, Environmental Review Unit to John Pelka, NEPA Compliance Coordinator, the Presidio Trust.* Dated: January 19, 1999. Subj: Supplemental EIS for the Letterman Complex. Sacramento, CA.

California Integrated Waste Management Board and State Board of Equalization

1997 *Landfill Tonnage Report by Facility.*

CEQ see *Council on Environmental Quality*

City and County of San Francisco (CCSF)

n.d. *San Francisco Planning Code.* Sections 102.9 and 204.5.

n.d. *San Francisco General Plan*. Department of City Planning.

1991 *Guidelines for Environmental Review: Transportation Impacts.* Department of City Planning.

1993 *Citywide Travel Behavior Survey*. Department of City Planning, San Francisco Public Utilities Commission, and San Francisco County Transportation Authority

1999a *Preliminary Negative Declaration for 98.599E – 2361 Lombard Street 126-Room Hotel.* Dated February 20, 1999.

1999b *Negative Declaration for 98.523E: 1880 Lombard Street Residential Building with 27 Units plus 11,000 Square Feet Commercial.* Dated November 28, 1998. Revised March 10, 1999.

1999c *Letter from Harlan L. Kelly, Jr., Deputy Director of Engineering and City Engineer to NEPA Compliance Coordinator.* Department of Public Works. Dated March 3, 1999. Subject: Participation in the NEPA Process.

1999d *Letter from Hillary E. Gitelman, Environmental Review Officer to NEPA Compliance Coordinator - Attn: Letterman Complex.* Dated August 2, 1999.

1999e *Electronic Mail Correspondence from Jerry Robbins, Department of Parking and Traffic to Richard Tilles, Transportation Coordinator, Presidio Trust.* Dated February 10, 1999.

The Concord Group

1998 *General Consulting Relative to the Development of the Financial Management Program for the Presidio of San Francisco, California.* July 8, 1998.

Council on Environmental Quality (CEQ)

1978 *Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act.* 40 CFR Parts 1500-1508.

1981 *Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations.* Memorandum to Agencies. 46 Fed. Reg. 18026 (March 23, 1981).

1997 *Considering Cumulative Effects Under the National Environmental Policy Act.* Dated January 1997.

CTA see *San Francisco County Transportation Authority*

Dames & Moore

1994 *Presidio of San Francisco Storm Water Management*. Draft Work-in-Progress.

1999 *Conceptual Engineering and Cost Estimates for Presidio Underground Parking.* Final Report. Dated: October 7, 1999.

EIP Associates

1999 *Memorandum from William F. Dietrich to John Pelka, Presidio Trust.* Re: Conformity Issue for Letterman Complex. Dated March 10, 1999.

EQE Engineering and Design and Lee Engineering Enterprises

1992 *Water Systems Study: Presidio of San Francisco, CA.* Prepared for the U.S. Army Corps of Engineers.

Exploratorium

1998 *Proposed Concepts for Renovation of Palace of Fine Arts and Additional Space in the Presidio*. Dated December 9, 1998.

2000 *Project Description, Exploratorium Improvement Program, Palace of Fine Arts.* Dated January 10, 2000.

Federal Highway Administration, U.S. Department of Transportation; California Department of Transportation; and Golden Gate Bridge, Highway, and Transportation District

1995 *Golden Gate Bridge Seismic and Wind Retrofit Project Draft Environmental Assessment/Initial Study*

Golden Gate Bridge, Highway and Transportation District (Golden Gate Transit)

1997 Memorandum from Maurice Palumbo, Senior Planner, Golden Gate Bridge, Highway and Transportation District. June 1997.

1999 *Golden Gate Bridge, Highway and Transportation District Electronic Toll Collection Project Revised Final Draft Strategic Plan*. Dated September 23, 1999. San Francisco, CA.

Golden Gate National Parks Association

1998 *Fort Baker Environmental Impact Statement Transportation Report*. Prepared by Wilbur Smith Associates.

1999 *Draft Master Plan for the Crissy Field Community Environmental Center*. In collaboration with the National Park Service. Dated March 1999.

Hansen, James V.

1999 *Letter from Chairman James V. Hansen to Representative Nancy Pelosi*. Dated April 13, 1999

HortScience, Inc.

2000 *Tree Report – The Letterman Complex , Presidio of San Francisco.* Prepared for the Presidio Trust. Dated January 2000.

Institute of Transportation Engineers

1991 *Trip Generation, 5th edition.* Washington, D.C.

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1993 *Presidio Public Safety Analysis: A Supplement to the Draft General Management Plan Amendment.*

1994 *Presidio Planning Socioeconomic Analysis Report: A Supplement to the Draft General Management Plan Amendment.*

Letterman Digital Arts Ltd.

2000 *Letter from Mr. Christopher Glennon, Director of Corporate Real Estate Operations to Ms. Jane Blackstone, The Presidio Trust.* Re: Vehicle Trip Reductions and TDM Elements. Dated February 1, 2000.

Mancini-Mills, et al.

1998a *Briefing Materials - Letterman Complex at the Presidio, January 9, 1998.* With Keyser Marston Associates, Inc., James Stephen Titus, AIA, Wilbur Smith Associates, and Dean Macris.

1998b *June 26, 1998, Presidio Real Estate Values Update.* With Keyser Marston Associates, Inc., Scott Hospitality Associates.

NBBJ: Architecture, Design, Planning

1992 *University of California, San Francisco: Letterman Army Medical Center Feasibility Study - Research Laboratory Use Alternative.*

National Oceanic and Atmospheric Administration – Cooperative Institute for Research in Environmental Studies Climate Diagnostics Center (NOAA-CIRES)

1990 *San Francisco Airport Observations Compiled Between 1961-1990.*

National Park Service, U.S. Department of the Interior (NPS)

1980 *Golden Gate National Recreation Area and Point Reyes National Seashore General Management Plan/Environmental Analysis*. Golden Gate National Recreation Area.

1981 *Energy Conscious Planning Guide.*

1988 *Presidio Validation Study.*

1992a *The Secretary of the Interior's Standards for the Treatment of Historic Properties*.

1992b *The Secretary of the Interior's Standards for Rehabilitation & Illustrated Guidelines for Rehabilitating Historic Buildings.*

1993a *Guiding Principles of Sustainable Design*.

1993b *Presidio National Register of Historic Places Registration Forms. October* 1993.

1993c *Presidio Cultural Landscape Report. Work-In-Progress, Phase One Priority Areas.* Golden Gate National Recreation Area.

1993d *Presidio Public Safety Analysis.*

1994a *Final General Management Plan Amendment and Environmental Impact Statement, Presidio of San Francisco*, Golden Gate National Recreation Area.

1994b *Presidio Transportation Planning and Analysis Technical Report: A Supplement to the Final General Management Plan Amendment, Presidio of San Francisco.* Prepared by Robert Peccia & Associates for Golden Gate National Recreation Area.

1994c *Request for Qualifications to Lease Buildings and Grounds in the Letterman Complex for Scientific, Research and Educational Purposes.* Golden Gate National Recreation Area.

1994d *National Park Service Issues Synopsis of Proposals for the Presidio's Letterman Complex.* News Release: Golden Gate National Recreation Area. Dated: May 18, 1994.

1994e *National Park Service and UCSF End Discussions on Presidio Letterman Lease*. News Release: Golden Gate National Recreation Area. Dated: December 2, 1994.

1994f *Presidio Building Leasing and Financing Implementation Strategy.* A Supplement to the Final General Management Plan Amendment, Presidio of San Francisco, Golden Gate National Recreation Area. Dated July 1994.

1995 *Restoration Plan for Lobos Creek*. Prepared for the Golden Gate National Recreation Area by Philip Williams & Associates, Ltd.

1996a *Presidio Traffic Update Report Findings: A Supplement to the Presidio Transportation Planning and Analysis Technical Report.* Presidio Project Office, Golden Gate National Recreation Area.

1996b *Integrated Pest Management Information Manual for the Presidio*. Prepared by Bio-Integral Resource Center for the Golden Gate National Recreation Area. Berkeley, CA.

1996c *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes.*

1996d *Environmental Assessment for Crissy Field Plan*. Prepared by Jones & Stokes Associates, Inc. (JSA 95-127). Sacramento, CA.

1996e *Environmental Assessment for New Presidio Golf Couse Facilities*.

1997a *Natural Resources Inventory and Vegetation Management Options, Presidio of San Francisco.* Prepared by Jones & Stokes Associates for the Golden Gate National Recreation Area. Sacramento, CA.

1997b *NPS-12: National Environmental Policy Act Guidelines* (Draft).

1997c *Environmental Assessment for Presidio Fire Station Improvements*.

1998a *Draft Presidio Bus Management Plan*. Presidio Project Office.

1998b *Electronic Mail Correspondence from Daphne Hatch, NPS Wildlife Specialist to Terri Thomas, NPS Park Ecologist and Carey Feierabend, Presidio Trust Planning Manager*. Dated: December 14, 1998. Subj: Letterman – Wildlife.

1998c *NPS-12: National Environmental Policy Act Guidelines (Draft).*

1999a *Presidio of San Francisco Vegetation Management Plan and Environmental Assessment*. In cooperation with the Presidio Trust.

1999b *Archeological Management Assessment and Monitoring Program.* Appendix A of Presidio Trust Letterman Complex Programmatic Agreement.

1999c *Fort Baker Plan Final Environmental Impact Statement*. Volume I. Dated October 1999.

1999d *Administrative Project Review Conditions and Designation of Categorical Exclusion for Repair Earthquake Damage and Miscellaneous Masonry Repairs – Fort Point (PR 99-082)*. Review Date: June 30, 1999.

1999e *Letter from B.J. Griffin, General Manager, Presidio, Golden Gate National Recreation Area to Jim Meadows, Executive Director, the Presidio Trust.* Re: Comments on the Proposed Range of Alternatives and Issues for the Letterman Complex Supplemental EIS. Dated February 16, 1999.

1999f *Presidio Bus Management Plan – Support Document. Summary and Analysis of Data Collected in 1998.* Prepared by Robert Peccia & Associates.

1999g *Revised Conditions of Approval: RFQ for Morton Street and Paul Goode Ballfields.* Dated May 25, 1999.

1999h *Scope of Services for the Presidio Trailways Master Plan and Environmental Assessment.* Denver Service Center NPS Contract No. 1443CX2000-99-11. Task Order No. 7.

1999i *Interagency Agreement Between United States Department of Interior, National Park Service and The Presidio Trust for NEPA Compliance.*

1991j *Facsimile correspondence from Capt. Michael Foster, United States Park Police, to John Miller, Bay Area Economics.* Re: Law Enforcement Review of Letterman Alternatives. February 23, 1999.

2000a *Building 102 Seismic – Project Description.* Correspondence from Michelle Rios to John Pelka. Sent January 20, 2000.

2000b *William Penn Mott, Jr. Visitor Center and Museum Expansion Project.* Information Flyer.

NOAA-CIRES see *National Oceanic and Atmospheric Administration – Cooperative Institute for Research in Environmental Studies Climate Diagnostics Center*

Nolte and Associates

1991 *Water Distribution System Evaluation*. Prepared for the National Park Service.

NPS see *National Park Service*

Presidio Trust

1998a *Request for Qualifications: The Letterman Complex, Presidio of San Francisco.*

1998b *Letter to the California Historic Preservation Officer, Acting, from James Meadows, Executive Director, Presidio Trust*. Dated August 31. Re: Section 106 Consultation for Presidio of San Francisco.

1998c *Letter to Cooperating Agencies from Karen A. Cook, General Counsel, Presidio Trust.* Dated January 5, 1999. Re: Request for Early Participation in the NEPA Process in Connection with Preparation of a Supplemental EIS for the Letterman Complex, Presidio of San Francisco.

1998d *Presidio Trust Financial Management Program Report to Congress.* Dated July 8, 1998.

1998e *Presidio Employee Transportation Survey Summary Results.* Dated October 1998.

1998f *Presidio Bus Management Plan*. Preliminary Draft. September 1998.

1998g *Request for Qualifications to Lease Building 39 at Historic Main Post.* Dated April 2, 1998.

1998h *Request for Qualifications to Lease Building 99 at Historic Main Post*. Dated April 2, 1998.

1998i *Request for Qualifications for Multi-Tenant Space and Buildings for Lease at the Historic Main Post.* Issued October 21, 1998.

1998j *Request for Qualifications for a Unique Opportunity to Lease, Rehabilitate, and Operate the Presidio Officers' Club*. Issued October 21, 1998.

1998k *Request for Qualifications for a Unique Opportunity to Develop a 23-Acre Site Within the Letterman Complex.* Issued August 14, 1998.

1999a *Request for Qualifications for a Unique Opportunity to Lease and Rehabilitate the Historic Public Health Service Hospital Complex*. Issued February 16, 1999.

1999b *A Request for Qualifications to Lease Playing Fields.* Issued April 26, 1999.

1999c *Leasing Schedule: Fiscal Years 2000-2001*. Dated December 9, 1999.

1999d *Letter from John Pelka, NEPA Compliance Coordinator to Richard Wright, U.S. Fish and Wildlife Service.* Dated: July 1, 1999. Proj: Letterman Complex.

1999e *How the Presidio Trust Uses the GMPA.* Feature Article in Presidio Post, Volume 2, Issue 8. August 1999.

1999f *Investing in the Presidio's Future: Financial Management Program Lays Out Blueprint for Funding Park Preservation*. Feature Article in Presidio Post, Volume 2, Issue 9. September 1999.

1999g *Electronic Mail Correspondence from Wendy Poinsot, National Park Service to John Pelka, Presidio Trust*. Subject: Letterman EIS Cumulative Impact Analysis. Dated December 16, 1999.

1999h *Water Reclamation Plant Planning Phase Drawing*. Scale: 1"=350'. Project No. MW02596. Dated 7/12/99.

1999i *Letter from B.J. Griffin, General Manager, Presidio to Mr. Jim Meadows, Executive Director, The Presidio Trust.* Re: Comments on the Proposed Range of Alternatives and Issues for the Letterman Complex Supplemental EIS. Dated February 16, 1999.

San Francisco Chronicle

1999 *UCSF on a Mission-Satellite Campus to Serve as Nucleus of Biotech Complex.* March 1, 1999.

San Francisco County Transportation Authority (CTA)

1999 *Request for Qualifications for Preparation of the Doyle Drive Environmental and Design Study.* RFQ No. 98/99-2. Dated March 1, 1999

2000 *Doyle Drive Environmental and Design Study Initial Environmental Study.* Prepared by Parsons Brinckerhoff. Dated January 2000.

San Francisco Guideway Associates

1996 *Doyle Drive Intermodal Study.*

San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD)

1998 *URBEMIS7G Computer Program User's Guide, Version 3.2 - Emissions Estimations for Land Use Development Projects.*

Transportation Research Board, National Research Council

1994 *Highway Capacity Manual*, Special Report 209, Third Edition, Washington, D.C.

U.S. Army

1993a *Condition of Selected Former Radioisotope Use Facilities, Letterman General Hospital and Letterman Army Medical Center.* Letterman U.S. Army Health Clinic, Presidio of San Francisco, CA.

1993b *Enc. 10: Mercury Spill and Monitoring SOP's, Sink-trap Inspection Records Certifications; Supplementary Institute Report: Status of the Former Letterman Army Institute of Research Facilities, Presidio of San Francisco.* CALL NO.: MIRP 165 Encl. 10, ID no.: 1336, DATE;

February 11, 1985, December 1993. Letterman U.S. Army Health Clinic, Presidio of San Francisco, CA.

1999 *Letter from David M. Wilkins, BRAC Environmental Coordinator, Presidio of San Francisco to Mr. John Pelka, NEPA Compliance Coordinator, Presidio Trust*. Dated January 15, 1999. Headquarters, I Corps and Fort Lewis, BRAC Environmental Office, Sausalito, CA.

U.S. Army Corps of Engineers

1991 *Final Environmental Impact Statement: Base Closure of the Presidio of San Francisco*. Sacramento District, Sacramento, CA.

1999 *Letter from Calvin C. Fong, Chief, Regulatory Branch to Mr. John Pelka, NEPA Compliance Coordinator, The Presidio Trust.* Dated February 3, 1999. San Francisco District, San Francisco, CA.

U.S. Congress

1993 *H. R. 3433, Section 1(h), 103rd Cong., 2d Session (House bill introduced by Rep. Pelosi on November 3, 1993).*

1994 *Senate Report 103–429, 103rd Cong., 2d Session (November 30, 1994).*

1995a *H. R. 1296, Section 3(d), 104th Cong., 2d Session (House bill introduced by Rep. Pelosi on March 23, 1995).*

1995b *H.R. 104–234, 104th Cong., 1st Session* (August 4, 1995).

U.S. Department of Commerce, Bureau of the Census

1992 *1990 Census.*

Vitkus, T.J.

1993 *Confirmatory Survey of the Letterman Army Institute of Research, Presidio of San Francisco, California.* Final Report (September 1993). Oak Ridge Institute for Science and Education. Prepared for U.S. Nuclear Regulatory Commission, Region V Office. Oak Ridge, TN.

Wilbur Smith Associates (WSA)

1997 *San Francisco Bicycle Plan.*

1999 *Letterman Complex Transportation Technical Report*. Prepared for the Presidio Trust.

Adverse Effect – Harm to historic properties, directly or indirectly caused by a federal agency's action. The regulations set forth criteria of effect and adverse effect at 36 CFR § 800.9.

Air Pollutant – Any foreign or natural substance that is discharged, released or over-generated into the atmosphere that may result in adverse effects on humans, animal, vegetation or materials. Also known as an air contaminant. Examples include but are not limited to, smoke, charred paper, dust, soot, grime, carbon, fumes, gases, odors, particulate matter, acids or any combination thereof.

Air Quality Management District – Local agency charged with controlling air pollution and attaining air quality standards. The Presidio is included in the Bay Area Air Quality Management District.

Ambient Air Quality Standard – Health- and welfare-based standards established by the state or federal government for clean outdoor air that identify the maximum acceptable average concentrations of air pollutants during a specified period of time.

Ambient Noise – The background noise associated with a given environment, usually a composite of sounds from many sources near and far.

Ambient Noise Level – The composite of noise from all sources near and far. The normal or existing level of environmental noise at a given location.

Archeological Resources – The physical remains of past human activity, including evidences of such activity on the environment.

Area A – The coastal area of the Presidio under the management of the National Park Service.

Area B – The Presidio Trust's area of responsibility, defined in Title I of the Trust Act, which includes nearly all built areas of the park.

Area of Potential Effects – The geographic area or areas within which an undertaking may cause changes in the character or use of historic properties, if any such properties exist there. This area always includes the actual site of the undertaking, and may also include other areas where the undertaking will cause changes in land use, traffic patterns, or other aspects that could affect historic properties.

Asbestos – A noncombustible, nonconducting, and chemically resistant mineral. Friable (easily crushed) asbestos, such as that contained in certain types of blown-on insulation or ceiling tiles, that is damaged, deteriorated, or easily accessible, represents a potential threat to human health.

Attainment – Achievement of air quality standards.

Best Management Practice (BMP) – Schedules of activities, prohibitions of practices, maintenance procedures and other management practices to prevent or reduce water pollution. BMPs also include treatment requirements, operating procedures, and practices to control site runoff, spillage or leaks, waste disposal or drainage from raw material storage.

Building Height – The vertical distance between finished grade and the top of a building. Building top is defined as the top of the finished roof in the case of a flat roof, and the average height of the rise in the case of the pitched or stepped roof. On a sloping site, this measurement is taken at the median grade height for each building face. Total building height is calculated by determining the average height of all individual building faces.

Carbon Monoxide (CO) – A colorless, odorless toxic gas produced by the incomplete combustion of carbon-containing substances. It is emitted in large quantities in the exhaust of gasoline-powered vehicles.

Conformity – A process mandated in the federal Clean Air Act to insure that federal actions do not impede attainment of the federal health standards. General conformity sets out a process that requires federal agencies to demonstrate that their actions are neutral or beneficial to air quality.

Contingency Plan – A plan that is developed to provide a decision framework to address the potential for unidentified contamination discovered during construction activities. The plan allows for the management of contaminants in a timely manner that is protective of human health and the environment.

Construction Site – The location of construction activity.

Cooperating Agency – A federal agency, other than the one preparing the NEPA document (the lead agency), which has jurisdiction over the proposal by virtue of law or special expertise and which has been deemed a cooperating agency by the lead agency. Under some circumstances, state or local governments and/or Indian tribes may be designated cooperating agencies.

Criteria Air Pollutants – Air pollutants for which the federal or state government has established ambient air quality standards or criteria for outdoor concentration in order to protect public health.

Cultural Landscape – The organization and interrelationships of the natural and designed features of a site by use reflecting cultural values and tradition, and changes to those features over time. At the Presidio, this character is inextricably linked to its continuous military occupation since 1776.

Cultural Resources – An aspect of a cultural system that is valued by or significantly representative of a culture or that contains significant information about a culture. A cultural resource may be a tangible entity or a cultural practice. Tangible entities at the Presidio include archeological resources, cultural landscapes and historic structures.

Cumulative Effects – Effects that are a result of incremental impacts of an action, when added to other past, present, and reasonably foreseeable future actions, regardless of which agency (federal or nonfederal) or person undertakes such actions.

dB or dBA – A decibel is the standard unit of sound amplitude, or loudness; decibels are measured on a logarithmic (i.e., non-linear) scale. The A-weighted scale is adjusted for human sensitivity. For decibels, each increase in 10 dB multiplies the previous value by 10; for example, 50 dBA is 10 times louder than 40 dBA, while 60 dBA is 100 times louder than 40 dBA.

Deconstruction – The dismantling of a structure in a fashion that maximizes the recovery of materials and recycling.

Direct Effect – An impact that occurs as a result of the proposed action or alternative in the same place and at the same time as the action.

Endangered Species – Any species that is in danger of extinction throughout all or a significant portion of its range.

Environmental Impact Statement (EIS) – A detailed NEPA document prepared when a proposed action or alternatives have the potential for significant impact on the human environment.

Environmental Justice – The fair treatment for people of all races, cultures, and incomes, regarding the development of environmental laws, regulations, and policies.

Environmental Screening Process – The analysis that precedes a determination of the appropriate level of NEPA documentation.

Exceedance – A monitored level of concentration of any air contaminant higher than national or state ambient air quality standards.

Financial Management Program – A long-range projection based on the direction of the Trust Act and the implementing policies and financial assumptions outlined in the report.

Fire Flows – Water flows available for fighting fires. Fire flows at the Presidio can be deficient due to undersized water mains, bottlenecks created by pressure release valves or water meters, unusable piping or spacing of fire hydrants farther apart than permitted by the Uniform Fire Code.

Fugitive Dust – Dust particles which are introduced into the air through certain activities such as excavation and site preparation during construction or some demolition activities, off-road vehicles, or any vehicles operating on open fields or dirt roadways.

General Management Plan Amendment – Developed through a four-year public planning process and adopted by the NPS in 1994, the plan outlines the vision for the Presidio as a national park in an urban area.

General Objectives of the GMPA – A directive of Congress incorporated into the Trust Act with which the Trust must comply. Because the GMPA text does not explicitly identify general objectives, the Presidio Trust Board ascertained and adopted General Objectives of the GMPA in Trust Board Resolution 99-11. The General Objectives of the GMPA guide Presidio Trust policy and decisions about resource protection and land and building use in Area B of the Presidio.

Greensward – A linear landscape element consisting primarily of lawn and planted trees which serves as an open space in a built-up or urban setting.

Ground Lease – The right to use a land parcel for a definite length of time by a tenant who invests the necessary capital to develop and construct improvements on the site.

Ground Rent – The rent paid for the use of land under the terms of a ground lease.

Groundwater – Subsurface water that occurs beneath the water table in soils and geologic formations that are fully saturated.

Guaranteed-Ride-Home Program – A program that assures an employee not arriving in his or her personal vehicle of a trip home. For example, an employee may have to work later than the departure time of his carpool or the last bus to his destination. The program would then provide the employee with a ride home in a company vehicle, subsidized taxicab or similar type vehicle.

Hazardous – Substances that are potentially harmful to human health or the environment.

Hazardous Wastes – A compound or compounds remaining for disposal or reclamation after use or after release to the environment.

Heritage Landmark Trees – Trees that have historic value, are outstanding botanical specimens, display unique traits, or serve a particular aesthetic function in the landscape.

Historic Designed Landscape – One that is consciously designed by a landscape architect, master gardener, architect or horticulturist according to established design principles.

Historic Views – Those views and view corridors which existed at the Letterman Complex during its period of significance.

Historic Property – Any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register. The term includes artifacts, records, and remains that are related to and located in such properties. The term "eligible for inclusion in the National Register" includes both properties formally determined as such by the Secretary of the Interior and all other properties that meet National Register listing criteria.

Impact Topics – Specific natural, cultural or socioeconomic resources that would be affected by the proposed action or alternatives (including no action). The magnitude, duration and timing of the effect to each of these resources is evaluated in the Environmental Consequences section of an EIS.

Indirect Effects – Effects that are caused by an action and occur later in time, or at another location, yet are reasonably foreseeable in the future.

Indirect Impact – Reasonably foreseeable impacts removed in time or place from the proposed action. These are “downstream” impacts, future impacts, or the impacts of reasonably expected connected actions (i.e., growth of an area after a highway to it is complete).

Infill Construction – New construction that is located within an existing developed area, such as a building complex. For the purposes of this EIS, infill construction refers to new development within developable areas of the Letterman Complex outside the 23-acre site proposed for building removal/replacement construction (see replacement construction). Infill development within a historic district should be compatible with its character and respect the scale, massing and materials found there.

Integrated Pest Management – The coordinated use of pest and environmental information with available pest control methods to prevent unacceptable levels of pest damage by the most economical means and with the least possible hazard to people, property and the environment.

Issues – In NEPA, issues are environmental problems that may occur if the alternatives (including no action) are implemented or continue to be implemented.

Landfill – A waste management unit at which waste is discharged in or on land for disposal.

Landscape Vegetation – Plant material, usually ornamental trees, shrubs, grass and plants growing around buildings or grounds that has been planted to beautify the site or for a utilitarian purpose such as screening a view.

L_{dn} – A day-night average noise level, a 24-hour average L_{eq}; it takes into account the greater annoyance of nighttime noise with a 10 dBA "penalty" added during the hours of 10:00 p.m. to 7:00 a.m.

Lead Agency – The agency either preparing or taking primary responsibility for preparing the NEPA document.

Lead-Based Paint – A source of lead in the environment. Lead is a highly toxic metal which, when present in the human body, attacks the central nervous system and can result in anemia, hyperactivity, lowered intelligence, stunted growth and mental retardation. Children, fetuses and women of childbearing age are particularly susceptible.

L_{eq} – The equivalent steady-state sound level is the average acoustic energy content of noise for a stated period of time. The L_{eq} of two different time-varying noise events are the same if the events deliver the same acoustic energy to the ear during exposure, no matter what time of the day or night they occur, unlike some other measurements that adjust for differences in noise sensitivity at night.

Letterman Complex – The 60-acre geographic area near the Lombard Street Gate in the Presidio that consistes of approximately 50 buildings including the Letterman Army Medical Center, the Letterman Army Institute of Research, and the Thoreau Center for Sustainability. The Letterman Complex contains a mix of historic and modern structures and is designated in the GMPA as a Building/Activity Core and Science and Education Center. For the purposes of this EIS, the “Letterman Complex,” the “60-acre Letterman Complex,” and the “complex” are used interchangeably.

Live/Work – A situation in which a resident of a dwelling unit utilizes his/her residence as a home-based office. Frequently, units intended to support live/work situations are designed with space for a separate office or work station within the dwelling unit.

Master Tenant – A respondent to the Letterman Complex RFQ who proposed to undertake the development of the full 23-acre site rather than proposing to be a subtenant within the development.

Mitigation – A modification of the proposal or alternative which lessens the intensity of its impact on a particular resource.

National Environmental Policy Act (NEPA) – Federal legislation that establishes environmental policy for the nation. It provides an interdisciplinary framework for federal agencies to prevent environmental damage and contains "action forcing" procedures to ensure that federal agency decision-makers take environmental factors into account.

National Historic Landmark (NHL) – These historic properties are designated by the Secretary of the Interior as having special importance in the interpretation and appreciation of the nation's history. Section 800.10 of the Advisory Council on Historic Preservation regulations specify some special protections for NHLs under the Section 106 review process.

National Historic Preservation Act (NHPA) – The basic legislation of the nation's historic preservation program that established the Advisory Council on Historic Preservation and the Section 106 review process.

Native Plant Communities – A group of plants growing together that are composed primarily of native plants and that were most likely found on that particular site prior to European settlement.

NEPA Process – The objective analysis of an action to determine the degree of its environmental impact on the natural and physical environment; alternatives and mitigation that reduce that impact; and full and candid presentation of the analysis to, and involvement of, the interested and affected public.

Nitrogen Oxides (NO_X) – Gases formed in great part from atmospheric nitrogen and oxygen and oxygen when combustion takes place under conditions of high temperature and high pressure; NO_X is a criteria air pollutant.

No Action Alternative – Under NEPA, an alternative that provides a benchmark for comparison, enabling decision-makers to compare the magnitude of the environmental effects of the various alternatives. In the case of the Letterman Complex, no action means minimal change from current management direction or level of management intensity.

Nonnative Plants – Plant species that have been introduced (or have invaded through natural dispersal from a site where they were introduced) and did not occur on that site prior to European settlement. Even though a plant grows as a native species in a nearby location, if habitat for that species does not occur on the site and if it did not occur there as part of a native plant community, it is considered to be nonnative. (For example, coast redwood occurs naturally within the Bay Area, but it is considered nonnative to the Presidio.)

Panama Pacific International Exposition – An exposition celebrating the opening of the Panama Canal, and the revival of San Francisco after the 1906 Earthquake. The Exposition was constructed by filling in marshland at the edge of the bay, creating the land area currently known as the Marina district, as well as the present day Crissy Field. It was open from February to December of 1915.

Period of Significance – A defined period of time during which a property established its historical association, meaning, or value.

Person Trip – A trip to or from the project made by one person in any mode of transportation: automobile, bus, transit, walking or bicycle.

Predicted Noise Level(s) – Future noise levels, resulting from predictable natural and mechanical sources and human activity including the project.

Preferred Alternative – The alternative that the Lead Agency believes would fulfill its statutory mission and responsibilities, giving consideration to economic, environmental, technical and other factors.

Presidio Trust – A federal government corporation established by Congress through enactment of the Presidio Trust Act (P.L. 104-333). The Presidio Trust has two fundamental missions: preserve and enhance the Presidio as part of the national park system and achieve financial self-sufficiency by 2013.

Programmatic Agreement – An agreement with historic preservation oversight agencies, the implementation of which satisfies the implementing agency's obligations under Section 106 and 110(f) of the National Historic Preservation Act to protect a National Historic Landmark.

Project Impact Zone – The area that would be affected by a proposed action.

Project Site – The defined geographic area of a specific project. For purposes of this EIS, the project site for Alternative 1 is the 60-acre Letterman Complex, and for Alternatives 2 through 6, the 23-acre site within the Letterman Complex that encompasses the LAMC and LAIR.

Receptors – Locations selected for determining noise or air quality impacts. These locations represent areas where frequent human use occurs, or is likely to occur in the foreseeable future.

Replacement Construction – Construction of new buildings that are intended to replace specific buildings that have been identified for demolition. For the purposes of this EIS, replacement construction refers to new development within a 23-acre site of the Letterman Complex as a substitute for the LAMC and LAIR which have been proposed by the Presidio Trust for demolition, and for other buildings within the complex that have been demolished or are proposed for demolition.

Request for Qualifications (RFQ) – A competitive procedure used by the Presidio Trust to produce the most appropriate tenants and guarantee a level playing field in the competition for space. The Trust considers potential tenants whose work is consistent with park goals, such as art, education, philanthropy, environmental studies, technology and science, and international relations.

Restoration Advisory Board (RAB) – An advisory body designed to act as a focal point for the exchange of information, concerns, values and needs between the community, the military and regulatory agencies. The RAB is intended to increase community understanding of hazardous waste cleanup efforts, improve the

soundness of government decisions and ensure that the cleanup is responsive to community needs. The Presidio RAB was established in April 1994.

Scope – The types of actions to be included in a project, the range of alternatives, and the impacts to be considered.

Scoping – Internal decision-making on issues, alternatives, mitigation measures, the analysis boundary, appropriate level of documentation, lead and cooperating agency roles, available references and guidance, defining purpose and need, etc. External scoping is the early involvement of the interested and affected public.

Section 7 – The section of the Endangered Species Act that outlines procedures for interagency cooperation to conserve federally listed species and designated critical habitats.

Section 106 – The section of the NHPA that requires federal agencies to consider the effects of their actions on historic properties and seek comments from an independent reviewing agency, the Advisory Council on Historic Preservation. The purpose of section 106 is to avoid unnecessary harm to historic properties.

Seismic Hazard Zone – An area where historic occurrence of liquefaction, or local geological, geotechnical and groundwater conditions indicate a potential for permanent ground displacements such that mitigation as defined in Public Resources Code Section 2693(c) would be required.

Service District Charges (SDCs) – Charges calculated to allow NPS to collect sufficient revenue to cover the costs of law enforcement and other services provided to Presidio tenants and organizations (excluding visitor-related costs). SDCs allocate the cost of providing these services at buildout according to generally accepted fiscal impact methodologies.

Significant – A subjective interpretation of the intensity of impact, in several contexts, of the proposed action or alternatives.

Solid Waste – Any non-hazardous garbage, refuse or sludge, which is primarily solid but may also include portions of liquid, semi-solid or contained gaseous material resulting from residential, industrial, commercial, agricultural, mining operations, and community activities.

Special Status Species – Plants and animals with limited numbers or distribution that have special legal and policy protection. They are protected under federal and state Endangered Species Acts or other regulation, or are sufficiently rare to either be candidates or under consideration for such designation.

State Historic Preservation Officer – The official in each state who (among other duties) consults with federal agencies during Section 106 review. The SHPO administers the national historic preservation program at the state level, reviews National Register nominations, and maintains file data on historic properties that have been identified but not yet nominated. Agencies seek the views of the appropriate SHPO(s) while identifying historic properties and assessing effects of an undertaking on historic properties

State Implementation Plan – EPA-approved state plans for attaining and maintaining federal air quality standards.

Storm Water – Storm water runoff and surface runoff and drainage.

Storm Water Pollution Prevention Plan – Developed and implemented to address specific storm water discharge concerns for construction sites.

Streetscape – The characteristics and components that give identity to a particular street. This includes the street itself, the buildings that border it, its sidewalks, street trees, and site furniture.

Surface Water – Freshwater rivers, streams and lakes.

Sustainability – An activity that meets the needs of the present without compromising the ability of future generations to meet their own needs.

Sustainable Design – An alternative approach to traditional design that does not require a loss in the quality of life, but require a change in mind-set and a change in values toward less consumptive lifestyles. These changes embrace global interdependence, environmental stewardship, social responsibility and economic viability. Sustainable design recognizes the impacts of every design choice on the natural and cultural resources of the local, regional and global environments.

Tiering – The coverage of general matters in broader environmental impact statements with subsequent narrower statements incorporating by reference the general discussions and concentrating solely on the issues specific to the statement subsequently prepared.

Toxic Air Contaminant (TAC) – An air pollutant, identified in regulation by the California Air Resources Board, which may cause or contribute to an increase in deaths or in serious illness, or which may pose a present or potential hazard to human health. TACs are considered under a different regulatory process (California Health and Safety Code Section 39650 et seq.) than pollutants subject to California Ambient Air Quality Standards. Health effects due to TACs may occur at extremely low levels, and it is typically difficult to identify levels of exposure which do not produce adverse health effects.

Transportation Demand Management (TDM) – A plan developed, using incentives or disincentives to discourage commuting using single-occupant vehicles, and to encourage travel by some other mode.

Treatment – A physical intervention, or development framework, carried out to achieve a historic preservation goal. Treatment options include preservation, restoration, reconstruction and rehabilitation.

Trust Act – The act that establishes the Presidio Trust as a federal government corporation subject to the requirements of the Government Corporation Control Act (P.L. 104-333). The Trust Act authorizes the Trust to manage a majority of the Presidio's land area by transfer of responsibility from the National Park Service in accordance with the purposes set forth in Section One of the Act that established the GGGNRA (P.L. 92-589) and the general objectives of the GMPA.

23-Acre Site – The site within the 60-acre Letterman Complex that contains the LAMC and LAIR and that has been offered through a Presidio Trust RFQ for 900,000 gross square feet of new development to replace the two nonhistoric buildings following their demolition.

Undertaking – Under NHPA, a federal activity that is subject to Section 106 requirements. The term is intended to include any project, activity, or program, and any of its elements, that has the potential to have an effect on a historic property and that is under the direct or indirect jurisdiction of a federal agency or its licensed or assisted by a federal agency.

URBEMIS – A computer model developed by the California Air Resources Board to estimate air pollutant emissions from motor vehicle trips associated with land use development.

Vehicle Trip – A trip to or from the project made by a transportation vehicle, primarily automobile. Equal to the number of person-trips made by automobile divided by the average numbers of persons per automobile.

Viewshed – The geographic area from which a site is visible, a collection of viewpoints.

Wetlands – Areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs and similar areas.

Windrow (or Windbreak) – A hedgerow or tight planting of trees made in open areas to protect a landscape or building from winds.

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Created by Congress in 1996, the Presidio Trust is charged with preserving the Presidio's natural, historic and scenic resources while making the park financially self-sufficient by 2013. Six Presidential appointees and the Secretary of the Interior or his designee sit on the Board of Directors and oversee management of 80 percent of the Presidio lands.

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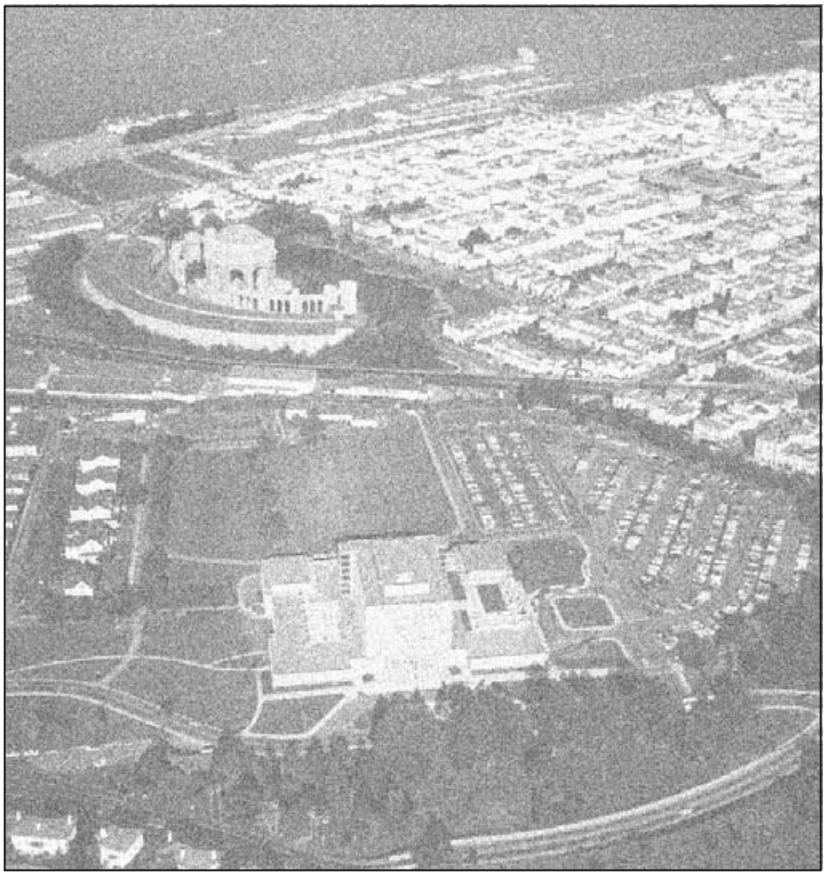
A. REVISED ENVIRONMENTAL SCREENING FORM



Background

- *Project Title* – New Development and Uses within the Letterman Complex
- *Agency* – The Presidio Trust, 34 Graham Street, P.O. Box 29052, San Francisco, CA 94129-0052
- *Project* – Demolition of the medical center and research institute and development and occupancy of approximately 900,000 square feet of mixed-use space within a 23-acre site
- *Contact Person* – John Pelka, NEPA Compliance Coordinator
- *Phone Number* – (415) 561-5300

Introduction

This revised Environmental Screening Form (ESF) is based on the results of scoping and a preliminary environmental analysis for proposed new development within the Letterman Complex (proposed project).[1] The ESF is being used to determine the "scope of work" and appropriate level of National Environmental Policy Act (NEPA) documentation for the proposed project. The analysis tiers from the 1994 Presidio Final General Management Plan Amendment (GMPA) Environmental Impact Statement (EIS) (National Park Service [NPS] 1994a). The GMPA EIS analyzed alternative concepts for the future of the Presidio, including a specific proposal for development within the Letterman Complex.

This ESF summarizes the issues discussed in the GMPA EIS, incorporates by reference the discussions in the GMPA EIS, and concentrates on issues specific to the proposed project. The ESF also identifies mitigation measures, including those required by the GMPA EIS to be implemented as part of the proposed project. NEPA regulations encourage the use of tiered documents to "eliminate repetitive discussions of the same issues" (Section 1502.20) and to "focus on the issues which are ripe for decision and exclude from consideration issues already decided or not yet ripe" (Section 1508.28). The Presidio GMPA EIS can be viewed at the Presidio Trust, 34 Graham Street, San Francisco, California or at Park Headquarters, Building 201, Fort Mason, San Francisco, California.

Project Description/Location

The 60-acre Letterman Complex (complex) is located in the northeast corner of the Presidio of San Francisco, one of the country's great national historic sites, with multidimensional significance. The former military post dates back to 1776 and was designated part of the Golden Gate National Recreation Area (GGNRA) in 1972. The Presidio's 1,480 acres feature unparalleled scenic beauty, dense forests, native plant communities, valuable wildlife habitat, expansive beaches and an extraordinary assortment of historic buildings and landscapes in a national historic landmark setting. The Letterman Complex, one of the most urban of Presidio spaces, is in close proximity to the Lombard Street Gate, and has been designated under the Presidio GMPA as one of the

[1] The Presidio Trust took into consideration comments on significant environmental issues received from agencies that reviewed an earlier version of the ESF (dated January 5th, 1999) in revising the ESF. Commenting agencies included the California Department of Health Services (1999), California Department of Water Resources (1999), California Department of Toxic Substances Control (1999), City and County of San Francisco, Department of Public Works (1999c) and Department of Parking and Traffic (1999e); National Park Service

"building and activity cores" where building demolition and replacement construction would occur. The Letterman Complex contains approximately 1.3 million square feet in about 50 buildings. The bulk of that space is contained in the non-historic 451,000-square-foot Letterman Army Medical Center (LAMC or medical center) and the non-historic 356,000-square-foot Letterman Army Institute of Research (LAIR or research institute), which dominate the site. The remaining square footage is contained in an assortment of historic warehouses, clinics, wards, offices and ancillary buildings, including the Gorgas Avenue warehouses, Letterman support buildings, non-historic dormitories and the 154,000-square-foot Thoreau Center for Sustainability. The site also contains surface parking lots, landscaped areas and roadways.

The proposed project would include the demolition of the outdated medical center and research institute and several other non-historic structures in the Letterman Complex and replacement with new low- to mid-rise or lower-profile mixed-use buildings totaling approximately 900,000 square feet. The Presidio Trust, as lead agency under NEPA and the approval agency for the proposed project, would enter into a long-term ground lease and development agreement to build and occupy the approximately 900,000 square feet of new mixed-use space on a 23-acre site within the complex. Development would comply with the Presidio Trust Act (P.L. 104-333), including consistency with the general objectives of the GMPA, the National Historic Preservation Act of 1966 (NHPA), and nationally recognized building codes[2].

Alternatives Overview

For the purposes of this analysis, six alternatives have been formulated for development and occupancy of the site:

1. Science and Education Center (Updated Presidio GMPA Alternative)
2. Sustainable Urban Village
3. Mixed-Use Development
4. Live/Work Village
5. Digital Arts Center
6. Minimum Management (No Action Alternative)

The alternatives were selected on the basis of concerns expressed during public involvement activities and the proposals received and shortlisted by the Presidio Trust in response to its Request for Qualifications (Presidio Trust 1998a) to develop the site. The alternatives differ primarily as to their development concept (size and type of project); proposed activities, programs and occupants; community support services and housing opportunities; and parking, access and circulation demands.

(1999e), U.S. Army, BRAC Environmental Office (1999); and U.S. Army Corps of Engineers, San Francisco District (1999). A summary of the environmental issues raised is provided in Section 5.3, Public Agency Consultation of the EIS.

[2] Development goals and objectives for the site are further described in the Request for Qualifications for the Letterman Complex (Presidio Trust 1998a).

Environmental Screening Checklist

The checklist form is used to assist in evaluating the potential environmental impacts of the proposed project with respect to the Presidio GMPA EIS. The checklist form identifies potential project effects as follows:

Yes	No	Impact Adequately Examined	Additional Analysis Required	
☐	☑	☑	☐	No potentially significant impacts that were not already adequately analyzed in the previous GMPA EIS or could not be avoided or mitigated.
☑	☐	☑	☐	Significant impacts that were already adequately analyzed in the previous GMPA EIS but could not be avoided or mitigated.
☑	☐	☐	☑	Potentially significant impacts that were not adequately analyzed in the previous GMPA EIS for which additional analysis would be required.

A discussion follows each impact topic identified in the checklist. Included in each discussion are mitigation measures incorporated or refined from the earlier GMPA EIS, or since added to further reduce such impacts based on the previous analysis.

ARE ANY NEW SIGNIFICANT IMPACTS POSSIBLE ON THE FOLLOWING PHYSICAL, NATURAL OR CULTURAL RESOURCES DUE TO DEVELOPMENT WITHIN THE LETTERMAN COMPLEX THAT HAVE NOT BEEN PREVIOUSLY EXAMINED IN THE PRESIDIO GMPA EIS?

	Yes	No	Impact Adequately Examined	Additional Analysis Required
A. Climate	☐	☑	☑	☐

The impact topic of climate was adequately analyzed on pages 101 and 102 of the Presidio GMPA EIS and previously dismissed from further consideration on page 137. Because development at the Letterman Complex would not result in any new impacts on temperature, wind, precipitation, or other weather conditions or patterns that have not been previously examined in the Presidio GMPA EIS, no further analysis is required.

B. Geology And Earthquakes	☐	☑	☑	☐

The impact topics of geology and earthquakes were adequately analyzed on pages 102 and 103 of the Presidio GMPA EIS and dismissed from further consideration on page 137 of the document. The analysis determined that a) structural damage is influenced by the geologic and soil conditions underlying structural foundations; and b) the greatest risk of earthquake damage is to structures built on differentiated superficial deposits. Only the very northern edge of the 23 acres where new development would potentially occur is within a seismic hazard zone (California Department of Conservation 1997).[3] Mitigation Measure GE-1 identified below would reduce known and/or anticipated geologic/seismic hazards to an acceptable level of risk. Because development at the Letterman Complex would not result in any new significant impacts on geological processes or conditions that have not been previously examined in the Presidio GMPA EIS, no further analysis is required.

[3] Defined as an area where historic occurrence of liquefaction, or local geological, geotechnical and groundwater conditions indicate a potential for permanent ground displacements such that mitigation as defined in Public Resources Code Section 2693(c) would be required (California Department of Conservation, 1997).

	Yes	No	Impact Adequately Examined	Additional Analysis Required

The following mitigation measure would be imposed upon the development team of the preferred alternative to provide reasonable protection of the public safety given site-specific conditions. The measure is based on the State of California's minimum criteria required for project approval within zones of required investigation as defined in CCR Title 14, Section 3724:

GE-1. *Seismic Hazard Evaluation* – Replacement construction would be allowed to proceed only when the nature and severity of the seismic hazards at the site have been evaluated in a geotechnical report and appropriate structural and design measures have been incorporated into the new construction. A registered civil engineer or certified engineering geologist having competence in the field of seismic hazard evaluation and mitigation would prepare the geotechnical report. The geotechnical report would contain site-specific evaluations of the seismic hazard affecting the project, and would identify any portions of the project site containing seismic hazards. The report would also identify any known offsite seismic hazards that could adversely affect the site in the event of an earthquake. The contents of the geotechnical report would include, but would not be limited to, the following:

Project description.

A description of the geologic and geotechnical conditions at the site, including an appropriate site location map.

Evaluation of site-specific seismic hazards based on geological, geotechnical and soils conditions, in accordance with current standards of practice.

Recommendations for appropriate mitigation measures, such as standard structural engineering techniques for foundations and building structural features, that are consistent with established practice and that would reduce seismic risk to acceptable levels.

Investigation of and integration of soils factors into engineering strengths of existing foundations and structural systems, in accordance with current standards of practice, if existing structures are considered for reuse.

Name of report preparer(s), and signature(s) of a certified engineering geologist and/or registered civil engineer having competence in the field of seismic hazard evaluation and mitigation.

The Presidio Trust would independently review the geotechnical report to determine the adequacy of the hazard evaluation and proposed mitigation measures. A certified engineering geologist or registered civil engineer having competence in the field of seismic hazard evaluation and mitigation would conduct such reviews.

In addition, the following mitigation measure would be adopted as necessary:

GE-2. *LAIR Investigation Report* – Should the LAIR building be considered for reuse, a site investigation report prepared by a certified engineering geologist and/or a civil engineer practicing within the area of his or her competence would document the results of an investigation of the structure for seismic safety and recommend structural and design measures to reduce the risk of identified seismic hazards to acceptable levels.

C. Floodplains	☐	☑	☑	☐

The impact topic of floodplains was adequately analyzed and previously dismissed from further consideration on page 137 of the Presidio GMPA EIS. The Letterman Complex is not located in a floodplain. The naturally flowing stream on the western boundary of the site has been diverted into a storm drain pipe and leaves the Presidio through the newly restored inlet at Crissy Field on the bay edge. Because development within the Letterman Complex would not result in any new impacts on floodplains that have not been previously examined in the Presidio GMPA EIS, no further analysis is required.

	Yes	No	Impact Adequately Examined	Additional Analysis Required
D. Water Quality	☐	☑	☑	☐

The impact topic of water quality was adequately analyzed on pages 106 and 107 of the Presidio GMAPA EIS and previously dismissed from further consideration on page 137. It was concluded that proposed improvements would have only minimal effects on water quality in San Francisco Bay. This conclusion is supported by:

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

To the extent possible, pavement would be removed at the site and replaced with landscaping. This would increase the permeable surface area, increase groundwater recharge by rain and irrigation water, and reduce the amount of storm water runoff and the amount of pollutants that eventually would reach the bay. Currently the 23-acre site is about 70 percent paving, hardscape, or building. Under the preferred alternative, this would be reduced to 40 percent with the remaining 60 percent pervious landscaped areas. The resulting average annual runoff for Alternative 5, based on 22 inches of annual rainfall, would be 570,000 cubic feet (cf) of runoff from pervious surfaces and 510,000 cf from landscaped surfaces. Alternative 5's innovative water treatment system would capture 400,000 of the 570,000 cf from pervious surfaces so the net runoff would be 170,000 cf from this cover type, giving a total average annual runoff to the restored wetlands and bay of 680,000 cf. The 23-acre site currently produces a total runoff of about 1,300,000 cf or about twice the planned site runoff. In addition, 80 percent of this runoff is from impervious surfaces, mostly paving.

Because proposed development within the Letterman Complex would not result in any new impacts on water quality that have not been previously examined in the Presidio GMPA EIS, no further analysis is required.

The following mitigation measure would be adopted to further minimize potential effects on water quality that could adversely affect aquatic and terrestrial habitat within Crissy Field and San Francisco Bay:

WQ-1. *Implementation of Best Management Practices* – Structural and operational best management practices (BMPs) and specific design criteria based upon the California Best Management Practices Handbooks would be incorporated into the project design during the preparation of plans and specifications. Structural BMPs would include improvements to address runoff, existing and proposed parking areas, oil and grease traps in catchbasins, infiltration systems, storm water detention basins, dry wells/cisterns, and biofilters. Operational BMPS to be implemented would include erosion control; structural maintenance; pipeline maintenance; pavement cleaning; landscape chemical management; stormwater monitoring; education and training; and tenant controls.

E. Solid Waste	☑	☐	☐	☑

The impact topic of solid waste was adequately analyzed and previously dismissed from further consideration on page 137 of the Presidio GMPA EIS. Solid waste would be managed through an NPS contract with a private contractor to collect, remove and haul trash to a transfer station off post. As a result of recycling and waste reduction methods to be employed by tenants, the overall tonnage would not have significant effects during

	Yes	No	Impact Adequately Examined	Additional Analysis Required

operation. However, since preparation of the GMPA EIS, changes have been made to the development concept that may result in an adverse impact on solid waste disposal facilities in the region. Development within the site under four of the six alternatives would necessitate demolition of both the LAMC and LAIR. Because demolition of the LAIR building was not previously considered in the GMPA EIS, additional analysis of the impact due to solid waste generated during demolition is required.

F. Regional Economy and Employment	☐	☑	☑	☐

The impacts on employment opportunities and on the local and regional economy from development within the Letterman Complex are within the scope of and adequately analyzed on pages 164 through 167 of the Presidio GMPA EIS. The analysis involved calculating projections of employment, payroll, state sales and use tax revenues, and employee expenditures in the years 2000 and 2010. The analysis determined that changes in employment and earnings are not expected to cause a large disruption in the regional labor market. While the alternatives currently under consideration would differ on the mix of economic activity included in the GMPA, they would all fall within the range of economic activities envisioned for the Presidio in the GMPA EIS. Nevertheless, activities at the 23-acre site should provide a boost to San Francisco's economy since much of the income gain is expected to occur within the City and County of San Francisco. Development within the Letterman Complex is estimated to increase city employment and payroll by about 0.14 percent based on projections in the GMPA (NPS 1994a, p. 166). Because proposed development would not result in any new impacts on the regional economy and employment that have not been previously examined in the Presidio GMPA EIS, no additional analysis is required.

G. City Services

As discussed below, the Letterman Complex is served by utilities provided by both the Presidio Trust and outside utility providers.

1. Water Supply and Distribution	☑	☐	☐	☑

The potential impacts of development within the Letterman Complex on water services were analyzed in site-specific detail on pages 225 and 226 of the Presidio GMPA EIS. The analysis assumed that water use within the Presidio would come primarily from the Presidio sources and would be treated by the Presidio's (recently upgraded) water treatment facilities[4]. However, it estimated a minimal amount of city of San Francisco water (10,000 gallons per day) might be needed if uses at the LAIR required water of a purity that is not available from park sources. It is now envisioned that potable water may not be required from the city to service the Letterman Complex. In light of the upgrades in the Presidio water treatment system and water requirements for the development, additional analysis will be required.

2. Wastewater Treatment and Disposal	☐	☑	☑	☐

The sanitary sewer system at the Letterman Complex consists of several lines of variously sized cast iron pipe that flow to the east and discharge into the City and County of San Francisco system at the Lombard Street Gate. The system has recently been slip-lined. The potential impacts of development within the Letterman Complex on wastewater services are within the scope of the Presidio GMPA EIS and are analyzed on pages 106, 130, and 170 through 172. The analysis determined that no additional burden on the city system would be expected because it has the capacity to readily handle the estimated sewage discharge. Tenants would be expected to pay their prorated share of system costs (impact fees) as well as any service charges levied by the city. Future rates would vary

[4] The recent completion of renovations and upgrades at the Presidio water treatment plant has made it possible to resume diversions of Lobos Creek for potable and non-potable water. Diversions from this water resource are limited by natural flow capacities and specific goals in the Presidio GMPA.

	Yes	No	Impact Adequately Examined	Additional Analysis Required

according to a number of factors, including inflation and the level of the city's sewer system–related bonded indebtedness. Service charges would be calculated so that the system pays for itself. The analysis concluded that there would be no net benefit or cost to the city for the provision of sewer service.

For the purposes of this preliminary analysis, sewage discharge for each of the alternatives currently under consideration was recalculated. The analysis determined that maximum outflow to the City/County of San Francisco (CCSF) wastewater treatment facilities would be 78,000 gallons per day (gpd). The city has substantiated that treatment facilities operated by the CCSF would have sufficient wastewater treatment capacity to accommodate the estimated outflow (Beth Goldstein, Hydraulic Planning Group, pers. comm.; CCSF 1999d). The wastewater outflow represents approximately 0.02 percent of the average daily effluent treated by the Southeast Water Pollution Control Plant (the CCSF wastewater treatment facility that receives Presidio wastewater). At the same time, the city noted that new development at the Letterman Complex would contribute incrementally to the discharge of partially treated sewage from the city's combined sewer system during major storm events. Therefore, the city requested that the Presidio Trust should explore ways to offset increases in overflow volumes attributable to increased sanitary flows from the Letterman Complex (CCSF 1999d). This issue of untreated wastewater being discharged into the bay through emergency overflows into the storm drain system was previously discussed in the GMPA EIS (page 106). However, because the city would be reimbursed through sewage fees for wastewater treatment and disposal, no mitigation measures were identified.

In order to respond to the city's request and to address the needs of Presidio tenants for services such as waste management in an environmentally responsible manner as contemplated in the general objectives of the GMPA, the Presidio Trust is establishing a reclaimed water system that would be online and capable of: 1) accepting wastewater equivalent to no less than maximum sanitary flows from the 23-acre site for irrigation purposes within the Presidio; and 2) lowering overflow volumes within the city's system during wet weather events. Because the following mitigation measure would be incorporated into the project to address previously disclosed but heretofore unmitigated impacts on the city's wastewater treatment and disposal system due to park-wide development, no further analysis is required.

WT-1. *Water Reclamation Plant to Reduce Cumulative Impacts* – As appropriate or necessary to reduce cumulative impacts, the Presidio Trust would develop a water reclamation plant capable of reclaiming and treating a minimum of 200,000 gpd of sanitary sewage extracted from the Presidio main sewer line. The reclaimed water would be made available to supply irrigation water for use in the Presidio and to lower the volume of wastewater discharged to the city's combined sewer system. The water reclamation plant would comply with the water quality criteria, treatment processes, treatment reliability, monitoring and reporting, and restrictions for use of reclaimed water established by the California Department of Health Services in Title 22, Division 4 (Environmental Health) of the California Administrative Code. These criteria would be enforced by the California Regional Water Quality Control Board (San Francisco Bay Region) to ensure that the reclamation plant is safe, reliable, and protective of public health. An engineering report prepared by a properly qualified engineer registered in California and experienced in the field of wastewater treatment, and containing a description of the design of the reclamation system would be filed with the California Regional Water Quality Control Board. The report would clearly indicate the means for compliance with the environmental health regulations and would be integrated with environmental analysis and related studies to satisfy NEPA requirements. The report would also contain a contingency plan that would ensure no untreated or inadequately treated wastewater would be delivered to proposed use areas.

3. Storm Drainage	☐	☑	☑	☐

The Presidio's storm water system is managed by the Presidio Trust. Storm water presently flows north to San Francisco Bay. Approximately 200 catch basins are present in the Letterman Complex area. The potential impacts of development within the Letterman Complex on the storm drainage system are within the scope of the Presidio

	Yes	No	Impact Adequately Examined	Additional Analysis Required

GMPA EIS and were analyzed on page 226. The analysis determined that the storm drainage system at the Presidio would be repaired and rehabilitated. Since 1994, these repairs have been initiated, and no additional demands or impacts on this system due to new construction at the Letterman Complex are anticipated. Implementation of features designed to minimize downstream impacts (such as the water treatment system in Alternative 5) would reduce the quantity of storm water discharged to San Francisco Bay (see Section D, Water Quality). In addition, a Storm Water Pollution Prevention Plan (SWPPP) (see Mitigation TS-1 below) and Best Management Practices (see Mitigation WQ-1 above) would improve the quality of discharged storm water through the construction of storm water treatments, and reductions in points of contact between storm water and pollutants and possible discharge of high-risk storm water to sanitary sewers. Because proposed development would not result in any new impacts on the storm drainage system that have not been previously examined in the Presidio GMPA EIS and additional mitigation measures would be incorporated into the development, no further analysis is required.

4. Electricity	☐	☑	☑	☐

The Trust's dedicated underground 12-kilovolt distribution feeders that originate at the Presidio's Greenwich substation serve the Letterman Complex. The potential impacts of development within the complex on the electric power distribution system are within the scope of the Presidio GMPA EIS and were analyzed on page 226. Since preparation of the GMPA EIS, electrical facilities servicing the Letterman Complex have been brought up to industry standards. Usage will be billed directly to the tenants. In addition, the development team and tenants would be required to incorporate technologies and demonstrate practices that reduce impacts or produce benefits in energy conservation. Because proposed development would not result in any new impacts on the electric power distribution system that have not been previously examined in the GMPA EIS, no further analysis is required.

5. Natural Gas	☐	☑	☑	☐

As discussed on page 20 of the GMPA EIS, the Letterman Complex would use the natural gas system maintained by Pacific Gas and Electric. No impacts would result, and no further analysis is required.

6. Law Enforcement Services	☐	☑	☑	☐

The NPS would have primarily law enforcement responsibility at the Letterman Complex through the U.S. Park Police (USPP) San Francisco Field Office (SFFO), which is currently responsible for law enforcement duties within the Presidio. The potential impacts of development within the Letterman Complex on law enforcement services are within the scope of and were analyzed on page 227 of the Presidio GMPA EIS. The analysis determined that law enforcement services are expected to be sufficient to control criminal activity, and there would be no impacts on operations or services, or on surrounding residential neighborhoods and commercial districts. Since adoption of the GMPA EIS, the SSFO has provided law enforcement services at the Presidio and has entered into a mutual aid agreement with the City and County of San Francisco. For the purposes of this preliminary analysis, the SFFO was contacted to determine whether any of the alternatives currently under consideration would result in increased demands for law enforcement services. The SFFO reviewed the alternatives and police patrol staffing needs in light of existing manpower constraints and minimum coverage available within current, authorized Full Time Equivalent (FTE) positions (NPS 1999j). Based on this review, the number of staff required to service the alternatives falls within the staffing plan established in the Presidio Public Safety Analysis (NPS 1993d). In addition, service costs were calculated to determine whether the alternatives would be within the range of costs that would be reimbursed through Service District Charge (SDC) (BAE 1999).[5] The calculations

[5] SDCs are calculated to allow NPS to collect sufficient revenue to cover the costs of law enforcement and other services provided to Presidio tenants. The SDC allocates the cost of providing district services to Presidio tenants and organizations (excluding visitor-related costs) at buildout according to generally accepted fiscal impact methodologies. Thus, when estimating police staffing, SDCs take into

	Yes	No	Impact Adequately Examined	Additional Analysis Required

confirmed that SDC revenues would be adequate to cover additional SFFO costs. Therefore, because proposed development would not result in any new significant impacts on law enforcement services that have not been previously examined in the Presidio GMPA EIS, no further analysis is required.

7. Fire Protection Services	☐	☑	☑	☐

Fire protection services would be provided by the NPS. The potential impacts of development within the Letterman Complex on fire protection services are within the scope of and were analyzed on page 227 of the Presidio GMPA EIS. The analysis determined that there would be no negative impacts on these services, or on the San Francisco Fire Department other than for any services that might be provided through mutual aid agreements. Since adoption of the GMPA EIS, the NPS has provided fire protection and suppression services and has entered into a mutual aid agreement with the City and County of San Francisco Fire Department. The current number and type of companies located at and the staffing plan for Station 1 at the Presidio already meet fire prevention and suppression service demands of existing buildings at the Letterman Complex. Given the physical proximity of the complex to Station 1 and the 60-foot height limit set forth in the GMPA for new construction at the site, no changes in the number and type of companies or staffing plan would be required by the proposed alternatives. However, to the extent that a specific use, massing or geographic distribution of structures results in requirements for fire protection services or specialized equipment in excess of existing or planned service and/or equipment outlays, the development team would be required to reimburse the Presidio Fire Department for such additional service and/or equipment costs. These requirements, if any, would be identified during the plan check process in accordance with normal industry practices (personal communication with Bill Oswald, Fire Chief, Presidio Fire Department). Therefore, because the proposed development would not result in any new significant impacts on fire protection services that have not been previously examined in the Presidio GMPA EIS, no further analysis is required.

8. Emergency Medical Services	☐	☑	☑	☐

Emergency medical services, including basic and advanced life support and hospital transportation for victims, would be provided by the NPS personnel assigned to the Presidio Fire Department. As discussed on page 169 of the GMPA EIS, there would be no effect on emergency units operated by the San Francisco Department of Public Health other than for services that might be provided through mutual aid agreements. Since the adoption of the GMPA EIS, the NPS has provided emergency medical services at the Presidio and has entered into a mutual aid agreement with the City and County of San Francisco. The NPS has staffed its ambulatory crews to comply with local agency protocols. Given the physical proximity of the Letterman Complex to Station 1 where the NPS houses its ambulance crew, no change in response times or required staffing that might impact emergency medical services is expected (personal communication with Bill Oswald, Presidio Fire Chief, National Park Service). However, to the extent that a specific use (such as certain assisted living programs) results in demand for emergency medical services in excess of existing or planned levels of service, the development team would be required to purchase such additional emergency medical services. Therefore, because proposed development would not result in any new impacts on emergency medical services that have not been previously examined in the Presidio GMPA EIS, no further analysis is required.

account the following: the type of use, hours of use, the type and availability of parking, the numbers of after-hour or special events, the mix of commercial, visitor and residential occupants, internal security needs, and integration of this service into the existing public safety infrastructure.

	Yes	No	Impact Adequately Examined	Additional Analysis Required
9. Schools	☑	☐	☐	☑

The potential impacts of development within the Letterman Complex on public schools were analyzed on page 171 of the Presidio GMPA EIS. The analysis determined that minor changes in enrollment due to changes in Presidio occupancy would not have a significant impact on the San Francisco Unified School District and Community College because the system could adequately provide the needed services. However, since preparation of the GMPA EIS, new housing units would be made available under two of the six alternatives. Because the number of school-age children from the Presidio enrolled in public schools may be greater than previously analyzed, the demand on school facilities would require further analysis.

H. Housing	☑	☐	☐	☑

The impacts on future housing stock use and demand from development at Presidio were analyzed on pages 172 and 173 of the Presidio GMPA EIS. The analysis determined that the Presidio was expected to provide sufficient housing for a variety of income levels to satisfy any new housing demand created by proposed development. No significant effects on the regional housing market or the affordable housing demand were expected. However, since preparation of the GMPA EIS, building and land uses under four of the six alternatives being considered for the Letterman Complex have changed, resulting in a different level of housing demand. (To the extent that proposed onsite housing would support Letterman Complex activities, the jobs-housing balance would be improved, thereby reducing transportation and related impacts.) Furthermore, several policies and programs have been established that could impact housing affordability. Since the impacts of development of the Letterman Complex on housing demand have not been determined, additional analysis is required.

I. Healthcare and Medical Research	☑	☐	☐	☑

The impacts on the military of closing the Letterman facilities have already occurred and are within the scope of and adequately analyzed on pages 3-15 and 3-16 of the Army base closure FEIS (U.S. Army Corps of Engineers 1991). The analysis concluded that closure of LAMC, combined with other closures at that time (e.g., the Oak Knoll Naval Hospital) would have an adverse effect on long-term health care facilities and would increase costs of medical care for military retirees and their dependents. The general impacts of rehabilitating, rebuilding or removing the LAMC, and leasing LAIR to a tenant or tenants for reuse as a research facility were described on page 174 of the GMPA EIS. However, the specific impacts of reusing the Letterman facilities could not be identified without a reuse proposal. Development within the Letterman facilities for other than research space may have an adverse effect on medical, life science and/or earth science knowledge and discovery in the Bay Area since the site could be precluded from such use under three of the six alternatives currently being considered. Because the space needs for medical research programs in San Francisco and the Bay Area have not been identified, additional analysis will be required.

J. Medical Aid Incidents	☐	☑	☑	☐

The potential impacts of development within the Letterman Complex on medical aid incidents are within the scope of and analyzed on page 175 of the Presidio GMPA EIS. The GMPA EIS determined that the increased number of medical aid incidents on the Presidio requiring hospitalization would not have an effect on hospital emergency rooms. Cases would be distributed among area hospitals, and the existing hospital emergency medical care system throughout the city could adequately provide the needed services. Because proposed development would not result in any new impacts on hospital services that have not been previously examined in the Presidio GMPA EIS, no further analysis is required.

	Yes	No	Impact Adequately Examined	Additional Analysis Required
K. Traffic and Transportation Systems	☑	☐	☐	☑

The potential impacts of development within the Letterman Complex on traffic volumes on Presidio roadways were analyzed on pages 176 through 184 of the Presidio GMPA EIS. The traffic models illustrated future worst-case traffic and travel conditions. The GMPA EIS projected average daily traffic to increase by 26 percent on weekdays and 27 percent on weekends by 2010 as a result of Presidio land use changes (NPS 1994b). The potential for congestion and other impacts related to traffic increases would be highest within the Presidio and near its boundaries. The analysis of traffic and transportation impacts concluded that implementing roadway and intersection improvements and correcting dangerous traffic conditions at several locations would avoid most impacts.

The baseline year ("existing conditions" model) used for impact comparison (1988) and intersection turning movement counts (summer 1991) in the GMPA EIS would require updating and re-analysis based on the Presidio Traffic Update Report of Findings (NPS 1996a) and other recent traffic counts. Since preparation of the GMPA EIS, building and land uses under four of the six alternatives and potential intersection and roadway improvements being considered for the Letterman Complex have changed, resulting in the need to update the previous traffic analysis. Marina neighborhood streets would also probably experience additional congestion during demolition of the LAIR. Also, additional traffic demand management actions to be taken at the Letterman Complex during operation to encourage non-automobile travel could result in noticeable increases in the non-automobile mode shares above what was previously projected. Because this new information may raise new traffic issues, additional analysis will be required.

The following mitigation measures would be adopted to reduce impacts on traffic and transportation systems. Additional mitigation measures may be imposed during the NEPA process.

TR-1. *Construction Traffic Management Plan* – Prior to construction, a Construction Traffic Management Plan would be prepared by the contractor(s) and submitted for Trust approval. The plan would include information on construction traffic scheduling, proposed haul routes, permittee parking, staging area management, visitor safety and detour routes. The contractor(s) would limit the transport of demolition debris, construction equipment and materials to periods of off-peak traffic whenever possible. Construction equipment including trucks would be restricted from accessing Lyon Street to minimize additional traffic on the surrounding neighborhood roadways and intersections. Any alterations to the Construction Traffic Management Plan would be subject to written approval by the Trust and review agencies prior to implementation.

TR-2. *Traffic Demand Management* – The Presidio Trust would require tenants and occupants to participate in a TDM program for the Presidio. The TDM program would establish the actions to be taken by the Presidio Trust and all park tenants and occupants to improve transit, pedestrian and bicycle conditions, and reduce automobile usage by all tenants, occupants and visitors. All Presidio tenants would be required to participate in the Presidio's TDM program designed to meet performance targets. Performance would be monitored through means including traffic counts and park-wide user surveys consistent with the TDM program. The Letterman lease would include provisions requiring the tenant to participate in the TDM program, and the tenant's Transportation Coordinator would assist the Presidio Trust's Transportation Manager to maximize participation in the TDM program.

TR-3. *Parking Supply and Monitoring* – Changes to the parking system at the Letterman Complex would reduce the number of currently available spaces while simplifying and better defining parking areas and locating them where needed. Parking demand would be monitored and the parking supply would be reduced over time as alternative transportation mode improvements were made. Parking for the Letterman Complex in adjacent neighborhoods would be discouraged. Adequate short-term, service and disabled-access parking

	Yes	No	Impact Adequately Examined	Additional Analysis Required
would be provided in convenient locations. It is expected that U.S. Park Police would enforce parking restrictions and regulations inside the park.				
L. Land Use, the Presidio Community and Surrounding Neighborhoods	☐	☑	☑	☐

The impacts of new uses at the Letterman Complex on the Presidio and surrounding neighborhoods are within the scope of and adequately analyzed on pages 184 and 185 of the Presidio GMPA EIS. To quantify the changes in building uses, a building database was developed that identified the 1989 use and square footage of each structure in the Presidio. For the purposes of assessment, each building was assigned a treatment and use code (for example, rehabilitation for current or new use, removal) corresponding with proposed actions, and the building use categories were totaled. In addition, land use maps were developed on a broader scale to represent overall use of the planning areas. Acreage figures were calculated for potential land uses. The analysis in the GMPA EIS determined that the density and character of land uses would not change at the Letterman Complex, but the area would be used for institutional purposes.

Proposed development under the alternatives being considered would not increase the density of land uses at the complex, since only replacement construction would be allowed to occur and total square footage would be capped at the existing 1.3 million square feet. In addition, although new uses are now being considered, these uses, including residential, retail, lodging and commercial/office have been contemplated in the GMPA for various areas within the Presidio. Implementation of recommendations in the Letterman Complex-specific planning guidelines on the appropriate character and location of uses within the 23-acre site and the remainder of the complex would ensure that no significant land use impacts would result.

New employment and uses within the Letterman Complex could lead to an increase in expenditures for business-related and personal goods and services ranging from office supplies and major equipment to daily lunches. Portions of this incremental increase in retail expenditure would be captured by businesses in areas along the western end of Lombard Street and Chestnut Street. Thus, the incremental increases in expenditure levels would provide increased business opportunities for retail and service establishments located in these areas, and no significant impacts are expected.

The EIS acknowledges that for areas that have been left vacant for a number of years, such as the Public Health Service hospital site, neighbors could be affected by increased activity at the sites and by additional noise and traffic in the vicinity. This is also a reasonable scenario for the near-vacant 23-acre site at the Letterman Complex. The associated impacts of changing land uses, including the effects on noise and traffic, are presented elsewhere in this document. Because proposed development would not result in any new impacts on land use, the Presidio community or surrounding neighborhoods that have not been previously examined in the Presidio GMPA EIS, no further analysis is required.

M. National Historic Landmark District	☑	☐	☐	☑

The potential impacts of development within the Letterman Complex on the National Historic Landmark district are analyzed on page 191 of the Presidio GMPA EIS pursuant to the National Historic Preservation Act (NHPA). The analysis determined that the removal of several non-historic structures within the Letterman Complex would allow for restoration of the historic setting of the earlier hospital complex and significant streetscapes, and would have a beneficial effect on the district. The GMPA further stated that if the LAMC is demolished and replaced with new construction, these buildings would be designed to be in keeping with the historic scene and in accordance with planning guidelines. Because the specific impacts of new design and replacement construction on the district could not be identified before preliminary development plans were submitted, further analysis of impacts is required.

	Yes	No	Impact Adequately Examined	Additional Analysis Required

The following mitigation measures are incorporated or refined from the GMPA EIS to ensure that new construction would not have an adverse effect on the National Historic Landmark district. Additional mitigation measures may be imposed during preparation of the NEPA environmental analysis, planning guidelines and Section 106 consultation under the NHPA.

CR-1. *Planning Guidelines* – The environmental document for the Letterman Complex would include planning guidelines for the site to be utilized and considered by the Presidio Trust in its review of an undertaking's effect on the character of the historic district (Presidio Trust 1998b). In addition, these guidelines would include provisions to meet sustainability goals. The criteria and design guidelines would direct all replacement construction and set forth review processes for replacement construction of buildings (massing, scale, heights, roof forms, colors, materials). A copy of these guidelines would be sent to the State Historic Preservation Officer for review.

N. Archeology	☑	☐	☐	☑

The potential impacts of development within the Letterman Complex on archeology are analyzed on page 193 of the Presidio GMPA EIS pursuant to applicable laws, regulations and policies for analyzing potential impacts on archaeological resources. The analysis determined that, because little is known about the extent, nature or location of artifact caches and the integrity of prehistoric and historic archaeological deposits at the site, any replacement construction might adversely affect remains. Since preparation of the GMPA EIS, four archeologically sensitive zones that may contain features or sites which would either contribute to the National Historic Landmark district or be individually eligible for listing on the National Register of Historic Places have been identified within the 60-acre Letterman Complex. These zones are:

- PAS-2. Presidio Marsh Archeological Sensitivity Area
- PAF-30. The Presidio House
- PAF-51. Earthquake Relief Camp 1 and Hot Meal Kitchen
- PAF-56. Spring Valley Water Company Flume/Pipeline

The removal of parking lot pavement and introduction of basement construction, underground parking or grading, because of the depth of the disturbance, may impact these zones and heretofore undetected archeological resources. Because proposed development may result in new significant impacts on archaeological resources that have not been previously identified in the Presidio GMPA EIS, further analysis is required.

O. Wetlands and Stream Drainages	☐	☑	☑	☐

The potential impacts of development within the Letterman Complex on wetlands and stream drainages are analyzed on pages 104, 105, and 194 of the Presidio GMPA EIS. The analysis determined that there are no wetlands on the Letterman Complex. The Tennessee Hollow drainage on the western edge of the complex has been altered through past construction by the U.S. Army and now drains directly into the restored Crissy Field wetlands area via the Presidio storm drain system. Proposed development activities would have no negative effect on these reestablished wetlands (see Section G.3, Storm Drainage). However, since Alternative 1 could involve infill construction throughout the Letterman Complex, this alternative could conflict with future restoration of the small section of riparian stream corridor to complete the natural drainage from Tennessee Hollow to Crissy Field. (The Tennessee Hollow project would be examined in a detailed plan that would include additional analysis of environmental impacts.) Because the following mitigation measure would be implemented as part of Alternative 1 to ensure that no future infill development would interfere with future restoration of the stream drainage, no further analysis is required.

	Yes	No	Impact Adequately Examined	Additional Analysis Required
SD-1. *Protection of Tennessee Hollow (Alternative 1 Only)* – Improvements including the design of walkways, landscaping, or structures in the western portion of the Letterman Complex would anticipate the future restoration of the Tennessee Hollow riparian corridor. The stream buffer zone would be mapped based on information developed by technical experts to ensure that such improvements would not be allowed within this zone. Asphalt for trail and any other construction in areas that drain toward the riparian corridor would be avoided, and stormwater runoff water quality would be maintained through biofiltering. No tree removal within the zone would occur without appropriate environmental review.				
P. Native Plant Communities	☐	☑	☑	☐

The potential impacts of development within the Letterman Complex on native plant communities are within the scope of and adequately analyzed on pages 194 and 197 of the Presidio GMPA EIS. The analysis determined that there are no existing native plant sites on the 23-acres site. Based on a tree survey prepared under the direction of the Presidio Trust (HortScience, Inc. 2000) for the purposes of this analysis, replacement construction within the 23-acre site could require the removal of 317 non-native mature trees (see Tables A-1 through A-3). Planning would take into account:

- opportunities for preserving existing mature trees;
- salvaging trees suitable for replanting within other areas of the Letterman Complex (including undisturbed portions of the 23-acre site), the Presidio, or elsewhere to the extent feasible; and
- remedial actions to improve vigor and construction survivability of preserved and replanted trees as part of long-range maintenance and management.

Removal of these trees is considered a less than significant impact because:

- none of the trees to be removed qualify as heritage landmark trees[6] (Nick Weeks, NPS Senior Landscape Architect, pers. comm.);
- none of the trees to be removed are native species[7];
- as discussed above, trees providing the most valuable wildlife habitat would be preserved and protected in place (see Section Q, Wildlife). These trees represent approximately 22 percent of the total trees to be preserved within the site;
- many of the trees to be removed are restricted or conditionally prohibited from use within designed landscapes within the Presidio because of existing and potential problems (disease, pest, and fire potential; invasive spread into native plant communities; short-life span; view-blocking tree height; or inappropriate soil or climatic conditions). These trees include the Monterey pines, pittosporums, liquidambars, and acacias which represent approximately 27 percent of the total trees to be removed;
- many of the trees to be replaced have strikingly different characteristics from historic species, would not maintain the visual integrity of the landscape which contributes to the National Historic Landmark District status, and are therefore considered unsuitable in historic landscapes. These trees include the Australian bush cherry, lemon bottlebrush, Forrest's silver fir, atlas cedar, yew pine, and fern pine which represent approximately four percent of the total trees to be removed;

[6] Defined in the Vegetation Management Plan (VMP) as trees that have historic value, are outstanding botanical specimens, display unique traits, or serve a particular aesthetic function in the landscape.

[7] Defined in the VMP as species that were most likely found on the Presidio prior to European settlement. Species native to California, but not native locally to the Presidio, are considered nonnative species.

	Yes	No	Impact Adequately Examined	Additional Analysis Required

- other trees more suitable to supplement historically planted species within the Presidio to better address the goals and objectives of the Vegetation Management Plan (NPS 1999a) would be planted as part of the landscaping plan for the new development; and
- tree replacement during nonhistoric building landscape renovation is permitted under the Vegetation Management Plan (NPS 1999a; page 59).

Proposed development activities would have no effect on proposed restoration of the drainage and riparian corridor along the western edge of the Letterman Complex, which would have a positive impact of reestablishing native plant communities. That project would be examined in a detailed plan that would include additional analysis of environmental impacts.

Because proposed development would not result in any significant impacts on native plant communities that have not been previously examined in the Presidio GMPA EIS and the following measure would be incorporated into the development, no further analysis is required.

The following mitigation measure would be adopted to maximize the beneficial impact on native plant communities.

NP-1. *Landscaping Plan* – A detailed landscaping plan would be prepared and approved as part of the design review process. The landscaping plan would be prepared in consultation with Presidio Trust staff and in accordance with the goals and objectives of the Vegetation Management Plan. Planning would take into account opportunities for native habitat enhancement where feasible and appropriate.

Q. Wildlife	☐	☑	☑	☐

The potential impacts of development within the Letterman Complex on wildlife are within the scope of and adequately analyzed on pages 194 through 197 of the Presidio GMPA EIS. The analysis determined that:

- Increased visitor use would cause impacts on resident wildlife species;
- Noise and disturbance associated with construction activities might temporarily disturb nesting birds;
- Other animals less tolerant of disturbance might also temporarily abandon construction sites (however, the majority of species within the Presidio are adapted to the noises of the urban environment); and
- The removal of nonnative trees at the site would decrease the number of trees available for nesting birds (however, restored native plant areas would provide new habitat for nesting birds).

Such effects were addressed by mitigation measures based on the GMPA EIS, including designation of appropriate recreational uses and use areas to limit visitor impacts on wildlife populations.

Since preparation of the GMPA, it has become known that American kestrels breed at the Presidio, and nesting pairs have been observed in palms near the LAMC (NPS 1997a).[8] The palms also define the northern breeding limits for the hooded oriole, which nests in the trees. The coast live oak trees along the perimeter of the 23-acre site provide excellent songbird habitat for a diversity of breeding and migrant birds, including a variety of flycatchers, warblers and vireos (NPS 1998b). Despite their introduced status, the flowering eucalyptus along the historic windrows attract insects which draw migratory birds. Their branches also provide nesting sites for raptors and cavities offer habitat for cavity nesting species (NPS 1997a). The Monterey pines offer less habitat value than eucalyptus, but they also provide roosting sites for larger species and sturdy nesting sites for raptors (NPS 1997a).

[8] No nests of this species, however, were specifically identified in spring 1994 surveys of Presidio forests (NPS 1997a).

	Yes	No	Impact Adequately Examined	Additional Analysis Required

Finally, the single redwood tree has higher wildlife value because other large trees surround it. Mitigation Measures WL-1 through WL-3 identified below would protect valuable habitat areas for these birds.

Because proposed development would not result in any new significant impacts on wildlife that have not been previously examined in the Presidio GMPA EIS and the following measures would be incorporated into the development, no further analysis is required.

The following mitigation measures would be adopted to control visitor use and protect and/or expand native wildlife habitat at the site.

WL-1. *Ornamental and Native Stand Protection* – Management treatments and practices described in the Natural Resource Inventory and Vegetation Management Options (NPS 1997a) would be taken to protect the most valuable wildlife habitat within the 23-acre site. These habitat areas would include the palms, the coast live oaks in the existing open space, the redwood, and the Monterey pines and eucalyptus within the historic windrows. Measures would include restricting the size of work areas, avoiding work when soils are wet and compaction-prone, and carefully training work crews to reduce potential impacts on vegetation.

WL-2. *Raptor Nests* – Prior to any construction activities, a qualified biologist would determine whether any birds of prey are nesting in the vicinity and whether they might be impacted by development. Observations would be made during the breeding season (January through July) prior to and during construction activities. If nesting pairs are located in the work vicinity, appropriate buffer zones would be delineated and the area closed by installation of temporary fencing until it has determined that nesting activity has ended. Other preventive measures, such as the use of signing, implementation of a monitoring program, and establishment of contingency plans would also be implemented as necessary to avoid accidental habitat degradation during the construction phase.

WL-3. *Nesting Birds* – Any removal (including mowing and tree-trimming) of landscaped, non-native or native vegetation would follow park guidelines for protection of nesting birds. These guidelines include restrictions on timing of vegetation removal, requirements for searching for active nests prior to removal, and maintaining mowed areas at low height to discourage nesting. Restriction of work areas and education of work crews would also reduce possible wildlife impacts.

WL-4. *Integrated Pest Management* – All development team members would be educated and would implement the integrated pest management options for managing the major pests found at the Presidio as identified in the Integrated Pest Management Information Manual for the Presidio (NPS 1996b). Visitors would have signs and information regarding the importance of litter control, not feeding wildlife and pest management issues.

R. Special Status Species	☐	☑	☑	☐

The potential impacts of development within the Letterman Complex on special-status species are within the scope of and adequately analyzed on pages 198 and 199 of the Presidio GMPA EIS. The analysis determined that development would not result in any adverse effects on special-status species. Proposed development activities would have no effect on proposed restoration of the drainage and riparian corridor along the western edge of the complex, which could benefit several bat species listed as federal species of concern. That project would be examined in a detailed plan that would include additional analysis of environmental impacts. Because proposed development would not result in any new impacts on special-status species that have not been previously examined in the Presidio GMPA EIS, no further analysis is required.

	Yes	No	Impact Adequately Examined	Additional Analysis Required
S. Topography and Soils	☐	☑	☑	☐

The potential impacts of development within the Letterman Complex on topography and soils are within the scope of and adequately analyzed in site-specific detail on page 200 of the Presidio GMPA EIS. The analysis was based on calculations of disturbance estimated from aerial photographs and drawings. The analysis determined that a total of 15 acres of soils within the Letterman Complex would be disturbed during pavement removal, intersection improvements, landscape rehabilitation and removal of deteriorated buildings, including the medical center. Minor recontouring might also be associated with the demolition of structures and infrastructure improvements. The analysis determined that impacts would be minor and temporary because the majority of soils that would be affected have been previously disturbed by human use. Such effects were addressed by mitigation measures based on the GMPA EIS. Demolition of the research institute and underground parking as proposed under four of the six alternatives for the Letterman Complex would increase soil disturbance but would not result in any new impacts that have not been previously examined in the GMPA EIS. However, as recommended on page 200 of the GMPA EIS, site-specific plans would be developed before the initiation of work and would include in-depth assessment and quantification of the anticipated disturbances, and no additional analysis is required.

The following mitigation measure was refined from the GMPA EIS and would be incorporated into the development to effectively eliminate any unacceptable or long-term resource damage. Additional specific mitigation measures may be developed as needed.

TS-1. *Storm Water Pollution Prevention Plan* – As directed by the Clean Water Act and other applicable requirements, a Notice of Intent would be filed with the State Water Resources Control Board prior to initiation of soil disturbing activities to obtain coverage under the NPDES General Permit for Storm Water Discharges Associated with Construction Activities (General Permit). The General Permit requires development, implementation, and compliance monitoring of a SWPPP that prescribes BMPs including structural, management and vegetation measures, to control erosion and contaminated runoff from the construction site. The inclusion of an analysis of potential downstream impacts on receiving waterways due to the permitted construction may be required. The Presidio Trust would minimize the discharge of soil and pollutants during excavation by requiring contractors to employ measures to contain disturbances within localized areas, including use of turbidity barriers, silt curtains, or equivalent measures as feasible and appropriate. Prescriptions for monitoring and reporting of BMP performance and conditions before and immediately after the completion of work would be conducted pursuant to the General Permit. Compliance with the BMPs included in the SWPPP would result in a minimal amount of soil erosion, and discharges of construction-related pollutants would be minimized.

T. Air Quality	☑	☐	☐	☑

The air quality impacts of development within the site are analyzed on pages 202 through 208 in the Presidio GMPA EIS pursuant to Bay Area Air Quality Management District (BAAQMD) guidelines. The analysis concluded that: 1) mobile-source air contaminant levels, except for carbon monoxide (CO), would continue to be exceeded because of automobile traffic in the vicinity of but not related to activities at the Presidio; and 2) the effects of proposed uses at the Presidio on regional air quality would be less than significant. Such effects were addressed by mitigation measures based on the GMPA EIS analyses. Although no alternative currently under consideration for the Letterman Complex is expected to produce numbers of future trips to the Presidio greater than what was previously analyzed in the GMPA EIS, since the time of preparation of the GMPA EIS, the significance thresholds for regional emissions published by the BAAQMD have been reduced. Therefore, additional analysis is required to re-evaluate regional air quality impacts. The analysis would compare the localized CO concentrations at the heavily congested Lombard Street/Lyon Street intersection with the state standards. It should be noted that with regard to construction impacts on air quality, the BAAQMD no longer requires that construction emissions be quantified (BAAQMD 1996).

	Yes	No	Impact Adequately Examined	Additional Analysis Required

The following measures would be incorporated into the development to reduce air quality impacts. Additional mitigation measures may be developed as needed during the NEPA process.

AQ-1. *BAAQMD Control Measures* – To reduce construction-generated PM_{10} emissions, construction contractors would be required to implement as feasible and appropriate BAAQMD's recommended control measures for emissions of dust during construction.

AQ-2. *Demolition of Existing Buildings* – To the extent feasible and appropriate, the Presidio Trust would apply the most environmentally effective approach, including a combination of deconstruction and demolition techniques, to remove outdated structures and reduce fine particulate matter (PM_{10}) emissions from demolition activities.

AQ-3. *Transportation Measures* – All measures listed in the transportation mitigation section would be implemented to the extent feasible to encourage alternatives to automobile use, contribute to improvement of air quality and lower carbon dioxide emissions.

AQ-4. *Existing Stationary Source Permits* – The U.S. Army's existing stationary source permits for the Letterman Complex have been transferred to the Presidio Trust. All permit requirements would remain in force. Any further permits needed by tenants would require compliance with applicable federal, state and local laws regarding air quality.

	Yes	No	Impact Adequately Examined	Additional Analysis Required
U. Noise	☑	☐	☐	☑

The noise impacts of site development are analyzed on pages 208 through 213 in the Presidio GMPA EIS pursuant to compatibility standards established by the Federal Highway Administration and the American National Standard Institute[9]. The analysis concluded that future noise levels in the Presidio would be minimally higher that at present but would not violate the San Francisco noise ordinance. Construction would be a source of increased noise on occasion. Park land uses and related internal traffic increases would not have significant impacts on noise. Noise levels at sensitive areas (including the Letterman Complex) next to Highway 101, the major source of noise at the Presidio, would not increase substantially above existing levels. However, as traffic to and from the Presidio increased, the additional traffic might extend the period during which high noise levels occurred. These minor effects were addressed by mitigation measures based on the GMPA EIS analyses.

Noise levels presented in Table 4 in the "Affected Environment" section of the GMPA EIS would require updating and re-analysis based on new noise measurements, the most recent traffic counts, and potential traffic volume increases. In addition, the analysis of construction noise in the GMPA EIS was based on the demolition and removal of about 275 buildings, not including the research institute. Because demolition of the LAIR building is now being contemplated under four of the six alternatives, the characteristics and duration of noise for demolition/construction activities at the site as currently envisioned, and the effectiveness of the mitigation measures within the GMPA EIS would need to be refined as necessary. The applicability of the San Francisco Noise Ordinance (in the Police Code) to construction noise would also need to be reviewed and further documented. Because this new information may raise new noise issues, additional analysis is required.

	Yes	No	Impact Adequately Examined	Additional Analysis Required
V. Interpretation and Education	☐	☑	☑	☐

The beneficial impacts from expanded interpretive and educational opportunities at the Letterman Complex are within the scope of and adequately analyzed in site-specific detail on page 212 of the Presidio GMPA EIS. The analysis determined that conversion of the Letterman Complex from U.S. Army medical use to a tenant-operated

[9] For information related to noise measurements, standards and criteria, see Appendix C of the GMPA EIS.

	Yes	No	Impact Adequately Examined	Additional Analysis Required

research and education facility would provide new opportunities for San Francisco residents and visitors to attend educational programs and learn about advances in health and science. Because these effects were considered beneficial, no mitigation measures were identified in the GMPA EIS. Changes to the concept under the alternatives currently being considered may focus on issues other than human health, but would still be consistent with the Presidio Trust Act and the general objectives of the GMPA. Tenants would be required to include programs that acquaint visitors with history, culture and the arts, cross-cultural and international understanding, community renewal, and/or environmental stewardship and sustainability. These programs would benefit the Presidio, the participants, and the organizations and communities they represent. Because these enhancements for achieving Presidio goals would have beneficial impacts on visitor interpretation and education comparable to those previously analyzed in the Presidio GMPA EIS, no further analysis is required.

W. Recreation	☐	☑	☑	☐

The impacts on specific recreational improvements at the Letterman Complex are within the scope of and adequately analyzed on page 214 of the Presidio GMPA EIS. The analysis determined that the two tennis courts and gymnasium at the Letterman Complex would be maintained and opened to park visitors to help expand recreational opportunities throughout the Presidio. The indoor swimming pool would be used by the Sixth Army for an indefinite period with limited public access. Since preparation of the GMPA EIS, the recreational facilities have been opened to the public and are being operated by the YMCA. In addition, under several of the alternatives being considered, the tennis courts would be relocated and new facilities would be provided, which would have a beneficial impact on current users. Because no new adverse impacts to recreational programs and facilities from those previously analyzed in the GMPA EIS are expected, no further analysis is required.

X. Visual Resources	☑	☐	☐	☑

The potential visual impacts on scenic resources at the Letterman Complex are within the scope of and adequately analyzed in site-specific detail on pages 215 and 216 of the Presidio GMPA EIS. The following factors were considered in analyzing visual impacts:

- Visibility of the proposed landscape changes from major viewpoints (would the changes be seen and would they be visually conspicuous).
- Compatibility of landscape changes with the existing cultural landscape (would changes be in keeping with the historic character of the area).

The analysis determined that the Letterman Complex is not high in scenic quality. Some improvements in the visual setting at the complex would result from removal of pavement and buildings, restoration of the courtyard area behind the former administration building, and relandscaping. The analysis concluded that demolition and removal of the medical center would greatly improve views from many vantage points in the Presidio and enhance the visual integrity of the Letterman Complex but replacement construction may adversely affect scenic viewing. Additional analysis was recommended for major replacement construction, including design guidelines and building height restrictions (no building is to be higher than adjacent structures) to help minimize these impacts.

Since preparation of the GMPA EIS, these concepts have changed from those previously analyzed and new adverse impacts on scenic viewing may result. Development within the site under four of the six alternatives would necessitate demolition of both the medical center and research institute. Additional analysis within the cultural resources section of the environmental document, site-specific planning guidelines and building height restrictions required in the GMPA EIS would address all major construction, including building(s) that would replace the research institute.

	Yes	No	Impact Adequately Examined	Additional Analysis Required

The following mitigation measures are refined from the GMPA EIS and would be incorporated into the planning guidelines to help minimize impacts on scenic viewing. Additional mitigation measures may be imposed upon the development during preparation of the planning guidelines to further reduce impacts.

VR-1. *Planning Guidelines* – The Planning Guidelines would be applied as set forth in mitigation measure CR-1 during site planning and design review to protect scenic resources.

VR-2. *Height of Replacement Construction* – The height of replacement construction would be compatible with nearby structures, with a maximum allowable height not to exceed that of LAIR (60 feet).

VR-3. *Maximum Allowable Square Footage* – The maximum allowable square footage for replacement construction would not exceed the existing 1.3 million square feet.

VR-4. *Vegetation Screen* – The vegetation screen next to the parking area along Lyon Street would be maintained to the extent feasible and appropriate.

Y. Human Health, Safety and the Environment	☐	☑	☑	☐

The cleanup of hazardous substances, pollutants and contaminants at the Presidio was not previously analyzed in the GMPA EIS. Rather, pages 217 through 223 of the document provided information regarding the currently known extent of contamination. As part of the Base Realignment and Closure process, the Department of the Army, with oversight by the State of California Environmental Protection Agency, is conducting assessment and clean-up activities related to hazardous substances, pollutants and contaminants at the Presidio. The Presidio is not designated as a National Priorities List site. Hazardous materials and hazardous substances defined under the Comprehensive Environmental Response Compensation Liability Act (CERCLA) do not impact the Letterman Complex. The LAMC and LAIR buildings are not identified in the Hazardous Substance Study Areas map provided on page 219 of the GMPA EIS. The prior fuel distribution system and associated storage tanks are being managed by the Army Corps of Engineers in accordance with state underground storage tank regulations. The Nuclear Regulatory Commission (NRC) completed in 1993 confirmatory radiological surveys of the LAMC and LAIR as part of its termination process. These surveys documented contamination issues, confirmed that such contamination had been remedied to NRC standards, and determined that the surveyed facilities are suitable for unrestricted use (U.S. Army 1993a, Berger 1993, Vitkus 1993). Asbestos and lead-based paint have been identified in the buildings, and would require remediation. Such remediation was addressed by mitigation measures based on the GMPA EIS.

Reports of the environmental studies conducted at the Presidio, of which the Letterman Complex is a component, can be reviewed at the information repositories maintained at Fort Baker or the San Francisco Main Library. Information about environmental remediation activities at the Presidio can be found on the World Wide Web at http://www.presidiosanfran.com. Because there are no changes to the development concept that would result in new information from that previously provided in the GMPA EIS, no further analysis is required.

The following mitigation measures are refined from the GMPA EIS and would be imposed upon the project to reduce impacts on human health, safety and the environment. The measures would be regularly evaluated and monitored by Presidio Trust staff to determine their effectiveness in reducing impacts and ensure compliance.

HH-1. *Asbestos Remediation* – Prior to initiating building demolition within the Letterman Complex, the Presidio Trust would identify all asbestos-containing materials and assess, document, and monitor their condition. The party conducting the building demolition would be responsible for compliance with all applicable asbestos regulations. Workers would use all necessary personal protective clothing and respiratory equipment during removal. During removal, all safety measures would be followed to prevent any contamination outside the removal area. Air purification and air monitoring equipment would be in operation during removal in interior areas. Air sampling would be conducted during removal.

	Yes	No	Impact Adequately Examined	Additional Analysis Required

Encapsulation would be done using approved sealants. All waste asbestos would be placed in approved and labeled double 6-millimeter plastic bags or approved, labeled Department of Transportation (DOT) drums. Waste asbestos would be properly transported under strict adherence to U.S. Environmental Protection Agency/Resource Conservation Recovery Act (EPA/RCRA), state and local regulations by a licensed hazardous waste hauler to an approved waste site. All necessary shipping documents would be prepared prior to any shipments.

HH-2. *Lead-Based Paint Abatement* – Prior to initiating building demolition within the Letterman Complex, the Presidio Trust would prepare a management and remediation plan for lead-based paint to reduce impacts of lead-based paint contamination to acceptable levels. All workers involved in lead abatement would follow required procedures to protect themselves and family members from exposure. Warning signs would be posted to mark the boundaries of lead-contaminated work areas. These signs would warn about the lead hazard, prohibit eating, drinking and smoking in the area, and specify any protective equipment required. Workers would use all necessary personal protective clothing and respiratory equipment during removal. During removal, all safety measures would be followed to prevent any contamination outside the removal area. Air purification and air monitoring equipment would be in operation during removal in interior areas. All waste lead–contaminated materials would be placed in approved, labeled waste collection receptacles. Waste lead would be properly transported under strict adherence to EPA/RCRA, DOT, and state and local regulations by a licensed hazardous waste hauler to an approved waste site. All necessary shipping documents would be prepared prior to any shipments.

In addition, the following mitigation measure would be adopted to further reduce impacts.

HH-3. *Contingency Plan* – Prior to initiating subsurface construction within the Letterman Complex, a Contingency Plan would be developed to provide a decision framework for the Presidio Trust to address the potential for unidentified contamination discovered during construction activities. The plan would allow the Presidio Trust and its contractors to manage identified contaminants in a timely manner that is protective of human health and the environment. The Plan would provide a discussion of the project, applicable regulatory requirements for the contingency activities, appropriate cleanup levels, notification/coordination requirements and plan approval process. The Presidio Trust would coordinate with the applicable regulatory agencies to obtain their concurrence regarding the proposed approach to, and during development of, the plan. Additionally, the Presidio Trust would coordinate with the Presidio Restoration Advisory Board.

Z. Energy Consumption	☐	☑	☑	☐

The impacts on energy consumption due to site development are within the scope of and adequately analyzed on pages 224 and 225 in the Presidio GMPA EIS pursuant to the Energy Conscious Planning Guide (NPS 1981) and NPS requirements. The analysis concluded that because of the number of buildings to be removed and the increased efficiency of rehabilitated buildings, energy consumption would be expected to decrease at the Presidio. Changes to the development under four of the six alternatives currently being considered would further reduce energy consumption because the research institute would be replaced with more energy-efficient buildings. Because there are no changes to the development concept that would result in new impacts to energy consumption facilities from those previously analyzed in the GMPA EIS and the following measure will be incorporated into the development, no further analysis is required.

The following mitigation measure is incorporated and refined from the GMPA EIS and would be imposed upon the proposed development to reduce impacts on energy consumption. The measures would be regularly evaluated and monitored by Presidio Trust staff to determine their effectiveness in reducing impacts and ensure compliance.

EC-1. *Conservation Measures* – In accordance with the energy requirements of Executive Orders 11912 and 12003, the development team would develop specific measures to minimize building energy use for each building to be constructed.

	Yes	No	Impact Adequately Examined	Additional Analysis Required
AA. Park Management and Operations	☐	☑	☑	☐

The impacts on park management and operations at the Letterman Complex are within the scope of and adequately analyzed on pages 225 through 228 of the Presidio GMPA EIS. Since preparation of the GMPA EIS, the Presidio Trust has further analyzed potential revenues for the Presidio from the Letterman Complex. Revenue earned by leasing new mixed-use space at the site would contribute to the implementation of the GMPA, including supporting the park's preservation, and the reduction of cost to the federal government. By 2013, when the Presidio must be financially self-sufficient, the Letterman Complex would generate at least $5 million per year, 14 percent of the Presidio's projected $35.7 million annual budget. The development team would also finance site development, including demolition of the medical center and research institute, which currently exist on site. The Presidio Trust would charge a service district fee, currently set at $2.89 annually per square foot of building area (subject to adjustment) to pay for Presidio-provided park services, such as fire protection, police protection, road maintenance, street lighting, offsite landscape maintenance, storm water discharge, and emergency medical response, and repair and rehabilitation of infrastructure systems. Because proposed development would not result in any negative impacts on park management and operations, no additional analysis is required.

BB. Cumulative Impacts	☑	☐	☐	☑

The environmental analysis in the Presidio GMPA EIS included the cumulative effects of site development on the environment. The Presidio GMPA defined cumulative effects as the effects of the actions added to the effects of the other past, present and reasonably foreseeable plans, projects, and activities in the GGNRA and the greater San Francisco Bay Area[10] (page 137). The analyses of cumulative impacts of site and other development in the Presidio that appear on the following pages of the Presidio GMPA EIS are incorporated by reference into this checklist and need not be repeated pursuant to the provisions for tiering: 167 (regional economy and the environment), 172 (city services), 175 (health care and medical research), 175 (medical aid incidents), 186 (land use, the Presidio community and surrounding neighborhoods), 194 (archeology and wetlands/stream drainages), 197 (native plant communities), 198 (wildlife), 199 (sensitive status species), 202 (topography and soils), 213 (interpretation and education), 215 (recreation), 218 (human health, safety and the environment), 225 (energy consumption), and 228 (park management and operations). Development within the site would contribute in a minor way to the referenced cumulative impacts, which were fully disclosed and adequately addressed in the GMPA EIS. Further analysis is required only for the following impact topics for which the incremental contribution of proposed development to cumulative effects addressed in the GMPA EIS may be significant: solid waste, water supply and distribution, schools, housing, traffic and transportation systems, cultural resources (including visitor experience and visual resources), air quality, and noise.

CC. Growth-Inducing Impacts	☑	☐	☑	☐

The growth-inducing impacts on the region as the local economy and community respond to Presidio activities, including development within the Letterman Complex, are within the scope of and adequately analyzed on pages 228 and 229 in the Presidio GMPA EIS. The analysis concluded that new jobs, visitors, and planned traffic circulation and safety improvements could result in indirect growth in population and housing demand in the city and region. Because there are no changes to the development concept that would result in new growth-inducing impacts from those previously analyzed in the GMPA EIS, no further analysis is required.

[10] Defined on page 88 of the Presidio GMPA EIS as the area within 50 miles of the Presidio and shown on the Regional Context map on page 89.

WOULD DEVELOPMENT WITHIN THE LETTERMAN COMPLEX, IF IMPLEMENTED:

	Yes	No
A. *Have significant adverse effects on public health or safety?*	☐	☑

Please refer to the above discussion under Impact Topic Y, Human Health, Safety and the Environment.

B. *Have adverse effects on such unique characteristics as historic or cultural resources, park lands, wetlands, floodplains, or ecological, significant or critical areas, including those listed on the National Register of National Landmarks?*	☐	☑

Please refer to the separate discussions under Impact Topics C (Floodplains), M (National Historic Landmark District), O (Wetlands and Stream Drainages), P (Native Plant Communities) and R (Special Status Species).

C. *Have highly controversial environmental effects?*	☑	☐

The Letterman Complex represents the largest development opportunity to be offered at the Presidio. Residents from the surrounding neighborhoods have already expressed concerns about possible future uses of the area and the effects on the community. Traffic congestion is a serious problem on nearby city streets. Increased traffic to and from the area may contribute to this congestion.

D. *Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks?*	☐	☑

No potential effects or risks that meet these criteria are likely to occur.

E. *Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects?*	☐	☑

The Presidio Trust is the approval agency for development within the Presidio. As lead agency under NEPA, the Presidio Trust ensures that environmental factors and concerns are given appropriate consideration in its decisions and actions, which may have potentially significant environmental effects. Each action for construction, demolition, renovation or development at the Presidio would be reviewed under its own merits and would be subject to the appropriate environmental documents under NEPA.

F. *Be directly related to other actions with individually insignificant, but cumulatively significant environmental effects?*	☑	☐

Development within the site would contribute in a minor way to the cumulative impacts referenced above in Impact Topic BB, Cumulative Impacts, which were fully disclosed in the GMPA EIS. Development within the Letterman Complex may also result in cumulatively significant environmental effects on solid waste, water supply and distribution, schools, housing, medical research, national historic landmark district, traffic and transportation systems, air quality and noise.

G. *Have adverse effects on properties listed or eligible for listing on the National Register of Historic Places?*	☐	☑

Please refer to the above discussion under Impact Topic M, National Historic Landmark District.

	Yes	No
H. *Have adverse effects on special status species, or have adverse effects on designated Critical Habitat for these species?*	☐	☑

Please refer to the above discussion under Impact Topic R, Sensitive Status Species.

I. *Require compliance with Executive Order 11988 (Floodplain Management), Executive Order 11900 (Protection of Wetlands), or the Fish and Wildlife Coordination Act (FWCA)?*	☐	☑

Executive Orders 11988 and 11990 direct federal agencies to enhance floodplain and wetland values, to avoid development in floodplains and wetlands whenever there is a practical alternative, and to avoid to the extent possible adverse impacts associated with the occupancy or modification of floodplains and wetlands. Development within the Letterman Complex would be compatible with these executive orders. The FWCA provides the basic authority for U.S. Fish and Wildlife Service review of water resources development projects. No "waters or channel of a body of water" would be modified during development within the Letterman Complex.

J. *Threaten to violate a federal, state, local or tribal law or requirement imposed for the protection of the environment?*	☐	☑

Replacement construction would comply with major federal laws, executive orders and regulations and associated state regulations.

K. *Require a permit from a federal, state or local agency to proceed, unless the agency from which the permit is required agrees a Categorical Exclusion is appropriate?*	☑	☐

As directed by requirements set forth in the Clean Water Act and state regulations, discharges of storm water runoff associated with construction activity would require an NPDES permit from the San Francisco Regional Water Quality Control Board, and development of as adequate Storm Water Pollution Prevention Plan for the project.

L. *Have the potential for significant impact as indicated by a federal, state or local agency or Indian Tribe?*	☑	☐

As discussed above, development within the Letterman Complex has the potential to have a significant impact on: solid waste; water supply and distribution; schools, housing, medical research; traffic and transportation systems; cultural resources; archeology; scenic viewing; air quality; and noise. The Presidio Trust has sought the advice and expertise of federal, state and local agencies and Indian Tribes to review its decisions about what to include in this environmental document.

M. *Have the potential to be controversial regardless of its impact?*	☑	☐

Please refer to the Response to Question C, above.

Impact Topics Requiring Additional Analysis

The proposed project may have a significant impact on the physical, natural or cultural resources checked below, requiring additional analysis as indicated by the ESF.

- ☐ Climate
- ☐ Geology and Earthquakes
- ☐ Floodplains
- ☐ Water Quality
- ☑ Solid Waste
- ☐ Regional Economy and Employment
- ☑ Water Supply and Distribution
- ☐ Wastewater Treatment and Disposal
- ☐ Storm Drainage
- ☐ Electricity
- ☐ Natural Gas
- ☐ Law Enforcement Services
- ☐ Fire Protection Services
- ☐ Emergency Medical Services
- ☑ Schools
- ☑ Housing
- ☑ Healthcare and Medical Research
- ☐ Medical Aid Incidents
- ☑ Traffic and Transportation Systems
- ☐ Land Use
- ☑ National Historic Landmark District
- ☑ Archeology
- ☐ Wetlands and Stream Drainages
- ☐ Native Plant Communities
- ☐ Wildlife
- ☐ Special Status Species
- ☐ Topography and Soils
- ☑ Air Quality
- ☑ Noise
- ☐ Interpretation and Education
- ☐ Recreation
- ☑ Scenic Viewing
- ☐ Human Health, Safety and the Environment
- ☐ Energy Consumption
- ☐ Park Management and Operations
- ☑ Cumulative Impacts
- ☐ Growth-Inducing Impacts

Public Involvement and Consultation with Affected Agencies

Public involvement and scoping for the previous EIS process is discussed on pages 300 through 302 of the GMPA EIS. Since preparation of the GMPA EIS, in order to facilitate public input regarding the range of potential uses currently being considered for the site, the Presidio Trust conducted a series of public meetings during the RFQ response period (August 14, 1998 through October 12, 1998). These public meetings included two public workshops and one formal meeting of the Golden Gate National Recreation Area Citizens' Advisory Commission. A front-page article describing the RFQ process for the Letterman Complex was also featured in the September issue of the Presidio Post, the monthly publication of the Presidio Trust. The Presidio Trust conducted a public workshop on January 27, 1999 to solicit public input regarding the alternatives and the specific impacts to be evaluated in the forthcoming environmental document. Written comments were also

encouraged. The Presidio Trust announced the release of the draft document and preferred alternative for public comment by notice in the Federal Register and in local news media. The GGNRA Citizens Advisory Commission also placed the Letterman Complex on the agenda of three public meetings, which were announced in the Federal Register and in local news media.

Government agencies administering programs and activities affecting the Presidio and having participated in the preparation of the GMPA EIS are listed on pages 306 and 307 of the GMPA EIS. The Presidio Trust will continue to consult with these and other agencies during the Letterman Complex planning and implementation process. Specifically, the Trust has solicited input from these agencies as to their jurisdiction by law or special expertise on any environmental issue that should be addressed in the environmental document (Presidio Trust 1998c).

References

Please refer to Section 6, References in the EIS.

Determination and Signatory

On the basis of this analysis:

☐ I FIND THAT THE PROPOSED PROJECT **COULD NOT** HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT, AND A **CATEGORICAL EXCLUSION** WILL BE PREPARED.

☐ I FIND THAT THE PROPOSED PROJECT **MAY** HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT, AND AN **ENVIRONMENTAL ASSESSMENT** OR AN **ENVIRONMENTAL IMPACT STATEMENT** IS REQUIRED.

☑ I FIND THAT THE PROPOSED PROJECT **MAY** HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT, BUT AT LEAST ONE EFFECT 1) HAS BEEN ADEQUATELY ANALYZED IN THE EARLIER PRESIDIO GMPA EIS PURSUANT TO APPLICABLE LEGAL STANDARDS, AND 2) HAS BEEN ADDRESSED BY MITIGATION MEASURES BASED ON THE EARLIER ANALYSIS AS DESCRIBED IN THE ESF, INCLUDING REVISIONS OR MITIGATION MEASURES THAT ARE IMPOSED UPON THE PROPOSED PROJECT. A **SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT** IS REQUIRED, BUT IT MUST ANALYZE ONLY THE EFFECTS THAT REMAIN TO BE ADDRESSED.

☐ I FIND THAT ALTHOUGH THE PROPOSED PROJECT COULD HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT, BECAUSE ALL POTENTIALLY SIGNIFICANT EFFECTS A) HAVE BEEN ANALYZED ADEQUATELY IN THE EARLIER PRESIDIO GMPA EIS PURSUANT TO APPLICABLE STANDARDS, AND B) HAVE BEEN AVOIDED OR MITIGATED PURSUANT TO THAT EARLIER EIS AS DESCRIBED IN THE ESF, INCLUDING REVISIONS OR MITIGATION MEASURES THAT ARE IMPOSED UPON THE PROPOSED PROJECT, NOTHING FURTHER IS REQUIRED.

KAREN A. COOK
General Counsel, Presidio Trust

Date

JOHN PELKA
NEPA Compliance Coordinator, Presidio Trust

Date

Table A-1
Trees to be Protected or Removed within the 23-Acre Site

		NUMBER OF TREES		
BOTANICAL NAME	**COMMON NAME**	**TO BE PROTECTED**	**TO BE REMOVED**	**TOTAL**
Abies delavayi var. forrestii	Forrest's silver fir	1	0	1
Acacia melanoxylon	Blackwood acacia	1	2	3
Araucaria heterophylla	Norfolk Island pine	1	0	1
Calistemon citrinus	Lemon bottlebrush	0	3	3
Cedrus atlantica 'Glauca'	Atlas cedar	1	0	1
Cerotonia siliqua	Carob	0	8	8
Eucalyptus citriodora	Lemon gum	1	0	1
Eucalyptus ficifolia	Red flowering gum	2	0	2
Eucalyptus globulus	Blue gum	25	2	27
Eucalyptus sideroxylon	Red ironbark	0	11	11
Juniperus chinensis	Hollywood juniper	0	16	16
Liquidambar styraciflua	Sweetgum	0	3	3
Magnolia grandiflora	Southern magnolia	0	5	5
Malus species	Apple	0	3	3
Maytenus boaria	Mayten	0	14	14
Metrocideros excelcus	New Zealand christmas tree	0	5	5
Phoenix canariensis	Canary Island date palm	6	0	6
Pinus canariensis	Canary Island pine	0	7	7
Pinus pinea	Italian stone pine	0	122	122
Pinus radiata	Monterey pine	35	32	67
Pittosporum eugeniodes	Tarata	3	0	3
Pittosporum undulatum	Victorian box	1	48	49
Podocarpus gracilior	Fern pine	0	2	2
Podocarpus macrophyllus	Yew pine	0	2	2
Prunus serrulata	Flowering cherry	0	2	2
Quercus agrifolia	Coast live oak	11	0	11
Quercus ilex	Holly oak	0	23	23
Schinus molle	California pepper	0	1	1
Sequoia sempervirens	Coast redwood	1	0	1
Syzgium paniculatum	Australian bush cherry	0	4	4
Ulmus parvifolia	Chinese elm	0	2	2
Washingtonia robusta	Mexican fan palm	2	0	2
	Total	91	317	408

Source: Hortscience, Inc. 2000

Table A-2
Additional Information on Trees within the 23-Acre Site

BOTANICAL NAME	COMMON NAME	HERITAGE LANDMARK TREE	HISTORIC LANDSCAPE FEATURE [1]	NATIVE SPECIES [2]	WILDLIFE HABITAT VALUE [3]	CONDITIONAL- OR RESTRICTED-USE SPECIES	HISTORICALLY INAPPROPRIATE SPECIES
Abies delavayi var. forrestii	Forrest's silver fir	No	No	No	Low	No	Yes
Acacia melanoxylon	Blackwood acacia	No	No	No	Low	Yes	No
Araucaria heterophylla	Norfolk Island pine	No	No	No	Low	No	No
Calistemon citrinus	Lemon bottlebrush	No	No	No	Low	No	Yes
Cedrus atlantica 'Glauca'	Atlas cedar	No	No	No	Low	No	Yes
Cerotonia siliqua	Carob	No	No	No	Low	No	No
Eucalyptus citriodora	Lemon gum	No	No	No	Low	No	No
Eucalyptus ficifolia	Red flowering gum	No	No	No	Low	No	No
Eucalyptus globulus	Blue gum	No	Yes	No	High	Yes	No
Eucalyptus sideroxylon	Red ironbark	No	No	No	Low	No	No
Juniperus chinensis	Hollywood juniper	No	No	No	Low	No	No
Liquidambar styraciflua	Sweetgum	No	No	No	Low	No	No
Magnolia grandiflora	Southern magnolia	No	No	No	Low	No	No
Malus species	Apple	No	No	No	Low	No	No
Maytenus boaria	Mayten	No	No	No	Low	No	No
Metrocideros excelcus	New Zealand Christmas tree	No	No	No	Low	No	No
Phoenix canariensis	Canary Island date palm	No	Yes	No	High	No	No
Pinus canariensis	Canary Island pine	No	No	No	Low	No	No
Pinus pinea	Italian stone pine	No	No	No	Low	No	No
Pinus radiata	Monterey pine	No	Yes	No	Moderate	Yes	No
Pittosporum eugeniodes	Tarata	No	No	No	Low	No	No
Pittosporum undulatum	Victorian box	No	No	No	Low	No	No
Podocarpus gracilior	Fern pine	No	No	No	Low	No	Yes
Podocarpus macrophyllus	Yew pine	No	No	No	Low	No	Yes
Prunus serrulata	Flowering cherry	No	No	No	Low	No	No

Table A-2
Additional Information on Trees within the 23-Acre Site

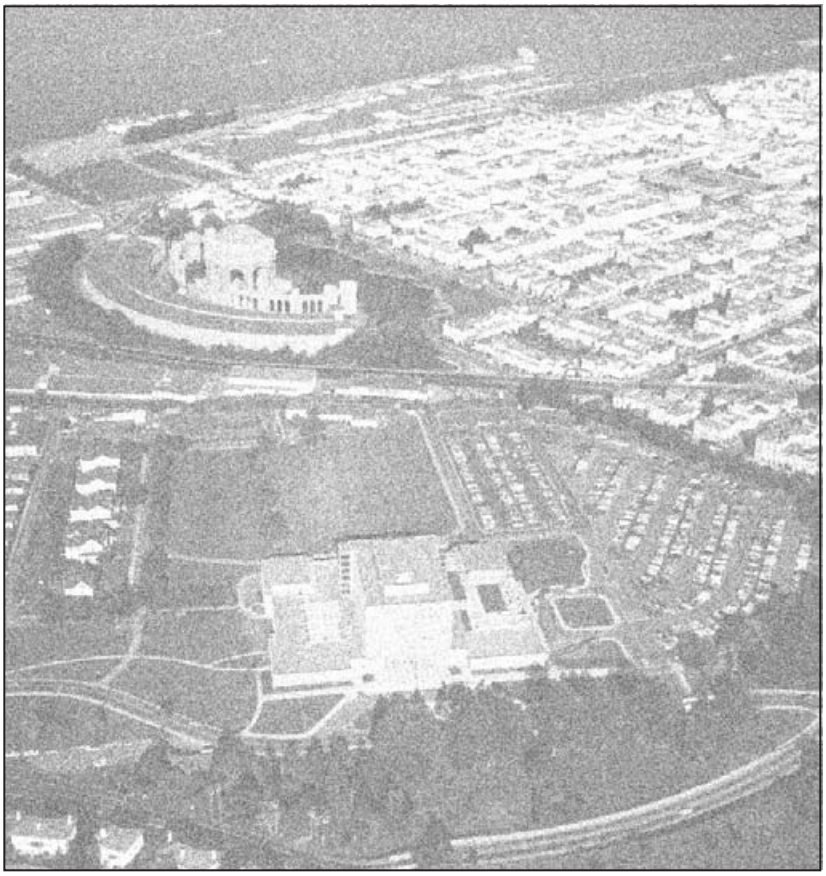
BOTANICAL NAME	COMMON NAME	HERITAGE LANDMARK TREE	HISTORIC LANDSCAPE FEATURE [1]	NATIVE SPECIES [2]	WILDLIFE HABITAT VALUE [3]	CONDITIONAL- OR RESTRICTED-USE SPECIES	HISTORICALLY INAPPROPRIATE SPECIES
Quercus agrifolia	Coast live oak	No	No	Yes	High	No	No
Quercus ilex	Holly oak	No	No	No	Low	No	No
Schinus molle	California pepper	No	No	No	Low	No	No
Sequoia sempervirens	Coast redwood	No	No	No	High	No	No
Syzgium paniculatum	Australian bush cherry	No	No	No	Low	No	Yes
Ulmus parvifolia	Chinese elm	No	No	No	Low	No	No
Washingtonia robusta	Mexican fan palm	No	Yes	No	High	No	No

1 Determined through the Letterman Complex Planning Guidelines.
2 Species native to California, but not native locally to the Presidio, are considered nonnative species.
3 Based on observed bird use and diversity within the Letterman Complex and the Presidio.

Table A-3
Age and Condition of Trees by Species

		AGE CLASSES				CONDITION CLASSES				
BOTANICAL NAME	COMMON NAME	SAPLING	JUVENILE	MATURE	OVER-MATURE	VERY POOR	POOR	FAIR	GOOD	EXCELLENT
Abies delavayi var. *forrestii*	Forrest's silver fir			1					1	
Acacia melanoxylon	Blackwood acacia			3			1	1	1	
Araucaria heterophylla	Norfolk Island pine			1				1		
Calistemon citrinus	Lemon bottlebrush			3				3		
Cedrus atlantica 'Glauca'	Atlas cedar			1					1	
Ceratonia siliqua	Carob			8			1	6	1	
Eucalyptus citriodora	Lemon gum			1				1		
Eucalyptus ficifolia	Red flowering gum			1	1		1	1		
Eucalyptus globulus	Blue gum			27			1	25	1	
Eucalyptus sideroxylon	Red ironbark			11		1	1	4	5	
Juniperus chinensis	Hollywood juniper			16					16	
Liquidambar styraciflua	Sweetgum			3			1	1	1	
Magnolia grandiflora	Southern magnolia			5			1	2	2	
Malus species	Apple			3			1	2		
Maytenus boaria	Mayten			14			1	7	6	
Metrocideros excelsus	N. Z. Christmas tree			5				1	4	
Phoenix canariensis	Canary Island date palm		1	5					5	1
Pinus canariensis	Canary Island pine			7				1	6	
Pinus pinea	Italian stone pine			122			6	40	73	3
Pinus radiata	Monterey pine			53	14		12	51	4	
Pittosporum eugeniodes	Tarata			3					3	
Pittosporum undulatum	Victorian box		2	46	1		13	19	17	
Podocarpus gracilior	Fern pine			2				1	1	
Podocarpus macrophyllus	Yew pine			2				1	1	
Prunus serrulata	Flowering cherry			2			1	1		
Quercus agrifolia	Coast live oak			11				4	5	2
Quercus ilex	Holly oak			23		1	8	7	7	
Schinus molle	California pepper			1				1		
Sequoia sempervirens	Coast redwood			1					1	
Syzygium paniculatum	Australian bush cherry			1	3		3	1		
Ulmus parvifolia	Chinese elm			2					2	
Washingtonia robusta	Mexican fan palm			2				2		
	Total	0	3	386	19	2	52	184	164	6

Source: HortScience, Inc 2000



FINAL

PLANNING GUIDELINES

THE PRESIDIO TRUST

FOR NEW DEVELOPMENT AND USES ON 23 ACRES WITHIN

THE LETTERMAN COMPLEX

PRESIDIO OF SAN FRANCISCO

SIMON, MARTIN-VEGUE, WINKELSTEIN, AND MORIS

MARCH 2000

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1. INTRODUCTION AND PURPOSE

These Planning Guidelines provide a planning and design framework for the entire range of actions expected in the 23-acre site, but also apply to undertakings that fall short of new construction, such as site improvements and historic building rehabilitation for the 60-acre Letterman Complex. Among the topics covered in the guidelines are new building construction on the 23-acre site, improvements in transportation systems and infrastructure; design and maintenance of the natural and cultural landscape; and rehabilitation of historic structures. They are to be used in conjunction with other guidelines already in place such as the *Secretary of the Interior's Standards for Treatment of Historic Properties with Guidelines for Treatment of Cultural Landscapes* (NPS 1996) and the *Guidelines for Rehabilitating Buildings at the Presidio of San Francisco* (NPS 1995). The Planning Guidelines should not be viewed as rigid rules. They have been prepared to serve as guides as the project moves through the process of negotiation, the signing of a lease, or the execution of a development agreement. The Trust's intent is to ensure that the project design and construction conforms as closely as practicable to the Planning Guidelines and design guidelines. They are envisioned as a continuing, interactive set of guides which would continue to provide guidance *after* the environmental review process for any action is concluded.

The Planning Guidelines begin with a description of the general context within which the Letterman Complex will take shape—its status as a national park, its designation as a National Historic Landmark, and its role as part of the Golden Gate National Recreation Area (GGNRA). A brief history of the Letterman Hospital, and broad sustainability policies are also outlined. This section is followed by planning guidelines for six broad categories: Land Use and Public Access; Pattern of Development; Scenic Views; Cultural and Natural Landscape; Building Form; and Access, Circulation, and Parking. In each category, planning and design principles are outlined, and specific guidelines are presented in the form of diagrams and text. The final section of the Planning Guidelines refer the user to additional resources which provide a rich source of background information relating to the Presidio.

The Presidio is within the boundaries of the GGNRA (Figure B-1). The Letterman Complex is one of several planning areas within the Presidio. The characteristics defined below represent the overarching policy setting of the Presidio that should be considered in the planning and design of new construction:

- A national park in an urban setting
- National and regional context
- National Historic Landmark district
- Models for sustainability

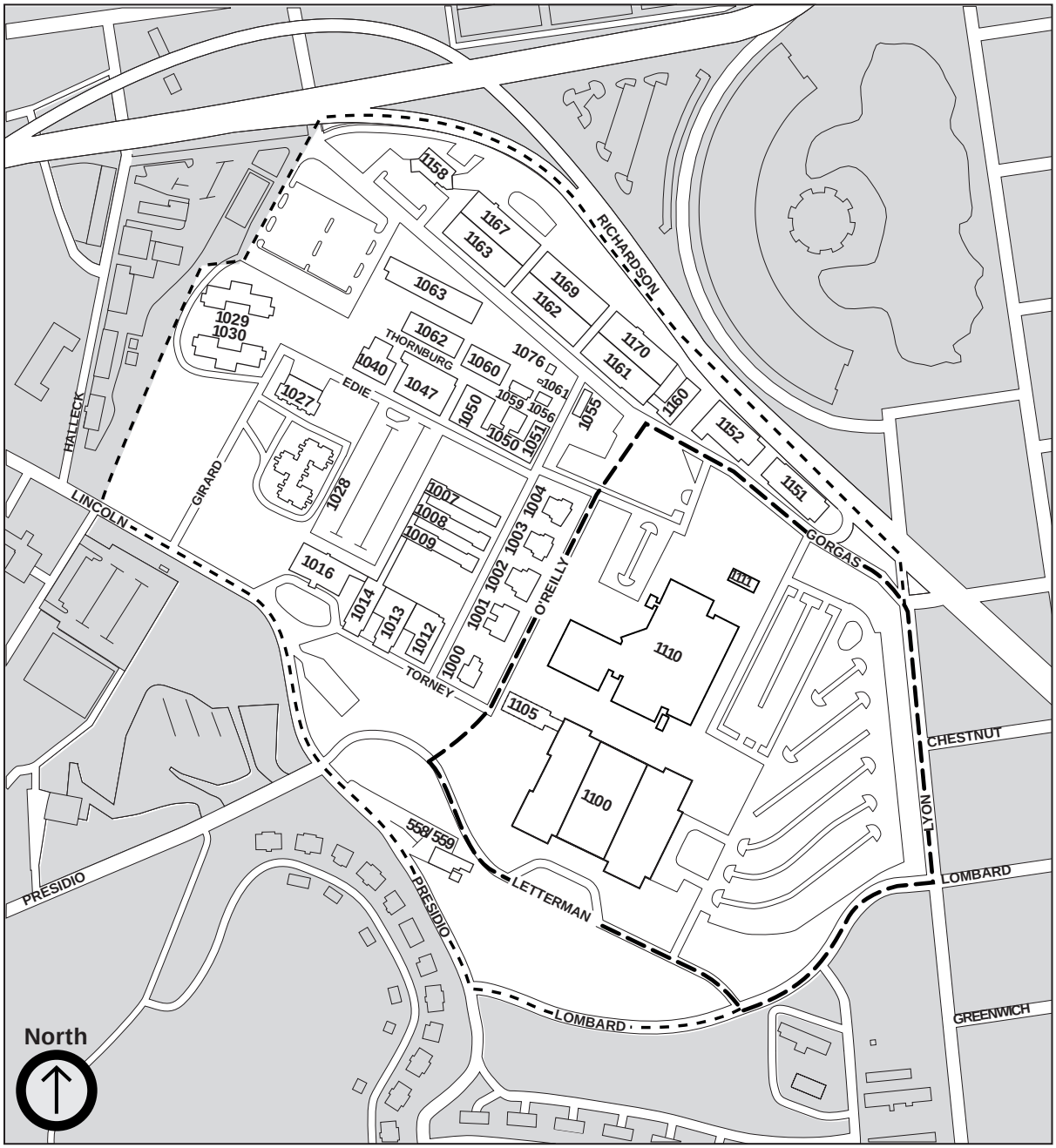


Figure B-1.
Project Boundaries: Letterman Complex
(Showing Current Conditions)

60-Acre Letterman Complex

23-Acre Site

2.1 National Park in an Urban Setting

The Presidio is a unit of the GGNRA, which was established by Congress in 1972 and consists of a collection of parklands surrounding the San Francisco Bay and nearby environs. Many of the parts of the GGNRA are, like the Presidio, former military holdings. The goal of establishing this urban national park was to preserve "for public use and enjoyment" areas possessing outstanding cultural, natural, historic, scenic and recreational values. The Presidio's distinctive resources include its historic architecture and landscapes, unique ecological systems and rare plant communities, inviting parklands, spectacular views and recreational resources. The Presidio attracts visitors who take advantage of interpretive programs and exhibits, and visit the historic military sites, as well as those who enjoy the natural resources, open space and scenery.

2.2 National and Regional Context

By making its array of cultural, natural and recreational resources accessible and available, the GGNRA provides educational and recreational opportunities for the metropolitan population of the Bay Area, as well as for visitors from across the nation and around the world. The GGNRA parklands represent one of the nation's largest coastal preserves, attracting 20 million visitors a year, more than any other unit of the national park system. Nowhere else in the national park system is a span and variety of history represented that is comparable to the 220-year continuum of the Presidio's use as a military garrison, occupied by Spain, Mexico and the United States. During its history, the Presidio has played a logistical role in every major U.S. military engagement since the Mexican-American War. It tells the story of the colonization of California, the settlement and exploitation of the American frontier, the Gold Rush, the growth of the city of San Francisco, the Asian immigration, and the evolution of U.S. involvement in the Pacific region.

2.3 National Historic Landmark District

A National Historical Landmark is a property of national historical significance as designated by the Secretary of the Interior under the authority of the Historic Sites Act of 1935. The Presidio of San Francisco was designated as a National Historic Landmark in 1962, with an update designation in 1993. It is recognized nationally as a Spanish colonial and then Mexican military settlement (1776–1846) and a major U.S. Army post from 1846 through World War II.

The 1993 update defines the Presidio's "period of significance" as spanning the years 1776 to 1945, and 1951. Buildings and features are considered to be historic (and thus contributing to the National Historic Landmark status) if they were constructed during the period of significance and still retain their integrity. Of the Presidio's 780 buildings, approximately 470 are historic and classified as "contributing features" to the National Historic Landmark district. The Letterman Complex contains 44 buildings; all but 9 are historic.

A historic district, such as the Presidio, consists of more than just individual historic buildings. It also includes the "cultural landscape." The cultural landscape is defined by land use patterns, and includes clusters of

buildings, circulation networks, open spaces and vistas, and small-scale distinguishing features. Cultural landscapes include not only plant material, grading, and other typical landscaping elements used to shape the natural landscape, but are also include the way that the physical environment is transformed on a larger scale by site organization, building form, and circulation. On the Letterman Complex, elements of the cultural landscape include traces left by the layout of the historic hospital complex, as well as that of the 1915 Panama Pacific International Exposition. Remnants of the site's past include buildings from the historic hospital complex, street layouts, open spaces, and a distinct approach to landscape design. Each of these elements evokes the site's history and contributes to Letterman's unique character. New construction and building rehabilitation that is planned within a historic district must respect the integrity of the district, and recognize the character-defining features of both the architecture and the cultural landscape.

2.4 A Physical History of the Letterman Hospital

2.4.1 ORIGINAL CONSTRUCTION AND EARLY YEARS

The land selected for the construction of the Letterman Hospital at the eastern boundary of the Presidio was partially bounded on its east and north edges by a slough and salt marshes (located on the Lyon Street edge, in the area north of Chestnut Street). Many considered this a poor location for a hospital, but others argued that its proximity to the city of San Francisco would be advantageous. This was one of the few edges of the military reservation where the U.S. Army and the city came face-to-face. The exact boundary of the Presidio along its eastern and southern edges had been contested for many years by the city of San Francisco, leading to a final court decision which established Lyon Street as the eastern edge of the Presidio in the 1870s. Non-military business enterprises at the Presidio's eastern edge, such as the public resorts known as Presidio House and the Harbor View Resort, attracted citizens to the Presidio's border, and offered recreation to Army personnel, as early as the 1860s. The establishment of rail service, in the form of steam trains, brought people to these resorts by the 1870s. With the establishment of the Letterman Hospital, a cable car line was brought into the Presidio as an extension of the Greenwich Street line, terminating in front of the main hospital building.

Construction of the Letterman Army Hospital, originally designated as the U.S. Army General Hospital, began in 1898 to accommodate soldiers during the Spanish-American War. The original hospital complex was designed as a 300-bed pavilion style hospital with the buildings, including wards, administrative buildings, operating theater, kitchen and mess halls arranged symmetrically around a centrally planted quadrangle. Most of the individual buildings were connected together by a glazed gallery that allowed easy access for soldiers in wheelchairs and gurneys. By 1904, additional buildings, such as an operating pavilion in the center of the quadrangle, the powerhouse, a laundry facility, two officers' residences and more barracks and wards were constructed.

2.4.2 THE PANAMA PACIFIC INTERNATIONAL EXPOSITION

The Panama Pacific International Exposition was a celebration of the opening of the Panama Canal, and was designed to showcase the revival of San Francisco after the 1906 Earthquake. Acres of swampy shoreline, in the neighborhood now known as the Marina, were filled in to create a level site for the fair. Based on a "city beautiful" concept of symmetrically laid out streets and blocks, it featured grandiose Beaux-Arts exhibition buildings and exotic landscaping. The Army, cooperating with the exposition organizers, allowed a significant portion of the exposition to be placed within the boundaries of the Presidio. It occupied all of the current 23 acres to the east of the original hospital (later to be known as the East Hospital site), the Gorgas Avenue warehouse area, and the area currently known as Crissy Field. Work began on the site in 1912, and the exposition opened to the public in 1915. Due to the outbreak of World War I in Europe, it closed after less than one year in operation. The Palace of Fine Arts is the only building remaining from the exposition. The Army reclaimed its land, putting the manmade flat land to immediate use as an airfield. The layout of Gorgas Avenue, Mason Street, and other streets in this area remain to this day. The road system laid out by the Exposition planners remained in part as the basis for the East Hospital street system, which remained until the early 1960s.

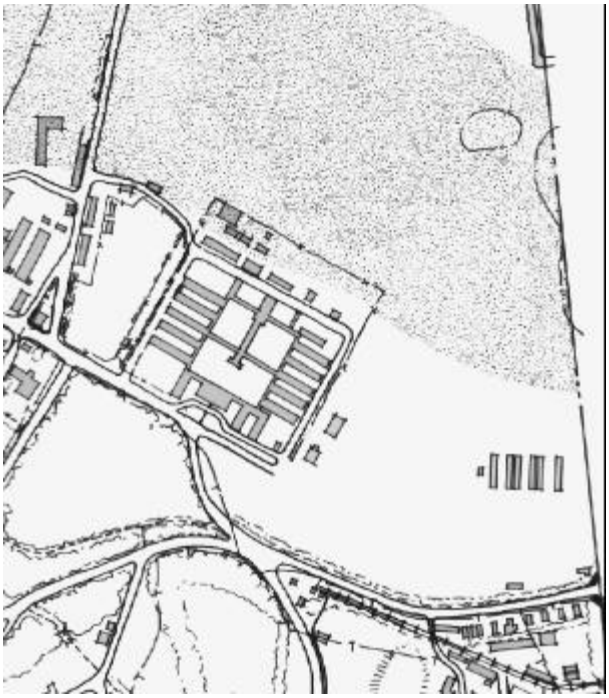


Figure B-2. Letterman Complex 1907

Figure B-3. Letterman Complex 1915
Panama Pacific International Exposition

2.4.3 WORLD WAR I

By World War I, Letterman Hospital had expanded significantly with the construction of four additional officers' residences along O'Reilly Avenue, new nurses quarters, kitchen and dining room, new stables, temporary barracks and quartermaster storehouses. By 1918, the utilitarian structures such as the laundry facility, the detention ward and the psychiatric ward were constructed along Thornburg Road. The East Hospital was constructed as an ancillary hospital to accommodate the vast number of incoming wounded soldiers. The new hospital complex included 18 patient wards, two barracks, kitchen and mess hall, and a Red Cross building. The YMCA constructed a building on Lincoln Boulevard, across from the hospital, to provide recreational space for the soldiers. Old roads were macadamized and new roads were built during this time.

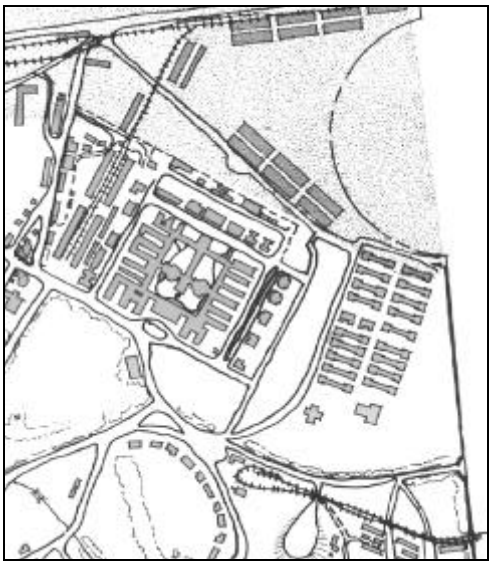


Figure B-4. Letterman Complex 1918

2.4.4 BETWEEN THE WARS

Following World War I, Letterman Hospital continued to grow. Patients continued to arrive from the Philippines, Hawaii, China and other western military installations. New medical programs were initiated and additional buildings were constructed to support these activities. During the 1930s, the hospital's commanding officer was concerned about the condition of the original wood-frame structures; he viewed them as lacking in modern requirements and as potential fire hazards. He ordered that many of the simpler wood-frame wards and clinics be replaced by larger, concrete ones. The current concrete buildings 1008, 1009, 1012, 1013 and 1014 were built to replace the earlier frame structures.

2.4.5 WORLD WAR II

The attack on Pearl Harbor placed Letterman Hospital in a combat zone and by 1942, the hospital served the triple function of being a port of embarkation, a general hospital and an evacuation hospital. Staggering numbers of soldiers from the Pacific poured into the hospital, making Letterman one of the busiest military hospitals in the country. Letterman Hospital took command of the temporary housing cantonments recently built on Crissy Field and used them as overflow hospital buildings. New, temporary wood-frame structures, built around the East Hospital, included three Special Service schools, administrative and barracks buildings and a new mess hall. This period represents the maximum building density on the site, with two-story barracks filling in around the 1918 East Hospital, and buildings placed very close to the site's boundaries. Buildings were densely placed on the site, but open space was always allowed between buildings so that daylight and natural ventilation reached each building. A system of linked buildings connected by enclosed galleries continued to be used. The Letterman Hospital was like a self-contained city within the Presidio, consisting of medical buildings, wards, service and utility buildings, recreational and entertainment facilities, housing, storage and warehouses, a laundry, food service, vegetable gardens and greenhouses.

Figure B-5. Letterman Complex 1943

2.4.6 POST–WORLD WAR II

After World War II, the military started planning a more modern hospital, although plans were temporarily stalled during the Korean War. By 1965, Congress authorized the construction of a new hospital and between 1965 and 1976, much of the original hospital quadrangle buildings and all of the East Hospital were removed to make way for the new structure. In 1968, a new 550-bed, 10-story building was constructed and was named Letterman Army Medical Center (LAMC) in 1973. Between 1971 and 1976, the Army constructed the Letterman Army Institute of Research (LAIR), new nurses quarters and an administrative supply building. In the post-World War II era, the hospital's role changed from serving wounded soldiers to serving the military community living in the region. Its role became that of a regional medical center, with emergency rooms and clinics, providing health care to active and retired military, and their dependents.

Figure B-6. Letterman Complex 1990s

2.5 Architectural Characteristics of the Letterman Complex

The Letterman Complex was administratively separate from the rest of the Presidio, and developed differently from the majority of the buildings constructed elsewhere in the Presidio by the Army. It was a self-contained entity, and for this reason, maintained a visual appearance and development pattern that is distinctive within the Presidio.

The following is a summary of the architectural character-defining features of the historic buildings at the Letterman Complex:

- The majority of the buildings are very plain, with little applied decoration. They are simple, straightforward buildings (see Figure B-7).
- Throughout the Letterman Complex, building form is determined by function. Considerable variety is evident in building shape and size, as a result of the broad mix of functions housed in the buildings.
- There is a broad range of building types in the Letterman Complex, ranging from residential, administrative, and medical to service buildings and warehouses.
- Architectural detail and materials are used to differentiate the ceremonial, public buildings from the service and functional buildings. Architectural detail and decorative features are used sparingly.
- Buildings are typically very long. Long, thin buildings are characteristic of military architecture found throughout the Presidio.
- A basement story is often clearly visible. Because of the slope of the site, the basement story is often fully above ground, at least on one side of the building.
- Buildings have tall floor-to-floor heights, but are frequently rather narrow, resulting in a distinctive proportion.
- Fenestration is characterized by tall, thin windows, which are used singly, in repetitive “punched openings” (as is seen in a hospital ward building) or grouped together to create large expanses of glazing (as is seen on galleries, the gymnasium or laundry).
- Building elevations are highly regular in organization. The placement of window and door openings is carefully laid out according to symmetry and geometric regularity.
- Buildings have overhanging eaves. Frequently, the eave line of a building contains decorative architectural elements (see Figure B-8).

Building groups at the Letterman Complex also have defining characteristics, including:

- Building complexes, sometimes of a very large size, created by linking smaller buildings with breezeways, enclosed galleries, and other connecting devices, to create connected building ensembles. (see Figure B-9)
- A common color scheme and palette of building materials unify the diverse collections of buildings at the Letterman Complex.

- The buildings of the historic hospital complex were laid out in a clear hierarchical pattern with public buildings facing the southern edge of the site, service buildings on the north edge, and internalized courtyards and open spaces which were private, or intended only for users of the complex.

Exterior spaces also have distinctive characteristics at the Letterman Complex, including:

- A system of courtyards and open spaces that are defined by building edges formerly existed. Today, only the spaces between the former ward buildings and the central parking lot of the Thoreau Center for Sustainability remain (see Figure B-9).
- Thornburg Road is a narrow space with an urban character. Its uniform street walls create a clearly defined exterior space, whose scale is very inviting for human activity.
- Gorgas Avenue is a wide, utilitarian street. Most of its buildings are warehouses with loading docks. Its width and the architectural character of the buildings which define its edges create an "industrial thoroughfare" which is consistent for most of its length.

Figure B-7. Buildings 1050 and 1051 are an example of linked buildings.

Figure B-8. Building 1047 contains decorative elements in its eave.

Figure B-9. A Narrow Courtyard Between Buildings 1008 and 1009 is one of the few which remain in the historic hospital complex.

2.6 Goals for Environmental Sustainability

The General Management Plan Amendment (GMPA) states that the Presidio will be a "model of sustainability" by using and demonstrating innovative environmental technology applications. Design for the Letterman Complex should adopt the principles of sustainable design and technology when upgrading the built environment.

Sustainability is an approach to design that recognizes that every design choice has an impact on the natural and cultural resources of the local, the regional and the global environment. At Letterman, it is expected that rehabilitation of historic structures, removal of existing buildings, new construction, and changes to the landscape will take place. Each of these actions has environmental consequences, and for each action, sustainable practices must be applied. These practices must start at the inception of the project's planning phase, and extend through the life of the building or site. The following recommendations address ways by which sustainability can be achieved at the Presidio:

- Respect and respond to the unique characteristics of each site, but recognize the interdependence of all actions on the planet.
- Conserve energy by minimizing the initial energy expended by construction requirements and by using systems that minimize energy for the operational future of the building.
- Use environmentally responsible building materials.
- Conserve water by reducing consumption and recycling rainwater and gray water.
- Provide a healthy environment by reducing or eliminating the use or release of toxins and pollutants.
- Reduce or eliminate waste by eliminating consumption, reusing materials, and recycling.
- Design landscapes that are drought tolerant and incorporate water conservation measures.
- Decrease the use of the private automobile, and increase the use of public transportation, bicycle and pedestrian circulation. Explore alternative means of transportation that have fewer negative environmental impacts than automobile use.

3. PLANNING GUIDELINES

The following section presents Planning Guidelines for the 60-acre Letterman Complex that address issues of siting, massing, access, and landscape. Broad design principles are outlined and followed by specific guidelines for their application.

The Guidelines are divided into six categories:

- Land Use and Public Access
- Natural Landscape
- Cultural Landscape
- Scenic Views
- Building Form
- Access, Circulation, and Parking

Each section outlines important design principles and guidelines for future action and should be considered together for a complete picture of the goals for the Letterman Complex.

Located adjacent to dynamic city neighborhoods and bustling visitor destinations, the Letterman Complex is the most urban among all sites within the Presidio. Historically as well, at the time of the Panama Pacific International Exposition and during its peak as a military hospital during World War II, Letterman was one of the most dense, active areas within the Presidio. The key to successful redevelopment of the Letterman Complex lies in regaining this vitality by creating a diverse, lively, publicly accessible community. The Letterman Complex should incorporate a variety of resources and activities that serve employees, residents and visitors to the site and create a dynamic public setting appropriate to its stature as part of a national park.

3.1.1 Design Principles

- Establish a planning and design setting at Letterman that encourages and accommodates a wide range of uses, reinforcing the Presidio as a unique community in which to work, visit or live.
- Integrate public access with private development to the benefit of both.
- Locate land uses that invite public use along major access routes and in association with public streets and open spaces.
- Encourage visitors and promote educational, interpretive, and recreational amenities, as consistent with Presidio-wide plans.
- Enhance linkages between the Letterman Complex and the rest of the Presidio, and, as possible, the city.

3.1.2 Guidelines

A. LAND USE

New public open space areas within the Letterman Complex should be sited to take advantage of key visitor circulation corridors. To that end, it is recommended that visitor-serving uses be located on the edges of the Letterman site. These "Public-Use Focus Areas" are identified in Figure B-10 and include areas around Gorgas Avenue, Thornburg Street, and Lombard Street/Letterman Drive. The general area between these two zones, identified in Figure B-10 as the "Working Core," is envisioned to contain uses related to the everyday working of the new Letterman development, including, but not limited to employee and resident amenities, service areas, and parking. In addition, a network of public open spaces and pedestrian connections is proposed to enhance public enjoyment of the site. This general land use diagram would vary depending on the mix of uses at Letterman and a particular project's needs as to access, service and amenities. (Refer to Figure B-10, "Land Use and Public Access.")

- *Lombard Street/Letterman Drive Public-Use Focus Area*

Sited along the historic and gracious Lombard Street Gate entry into the Presidio, this edge of the Letterman Complex is the formal "front door" to the site as well as to the Presidio as a whole. Public uses with a strong focus on education and interpretation of the area's historic, cultural, and natural resources are encouraged.

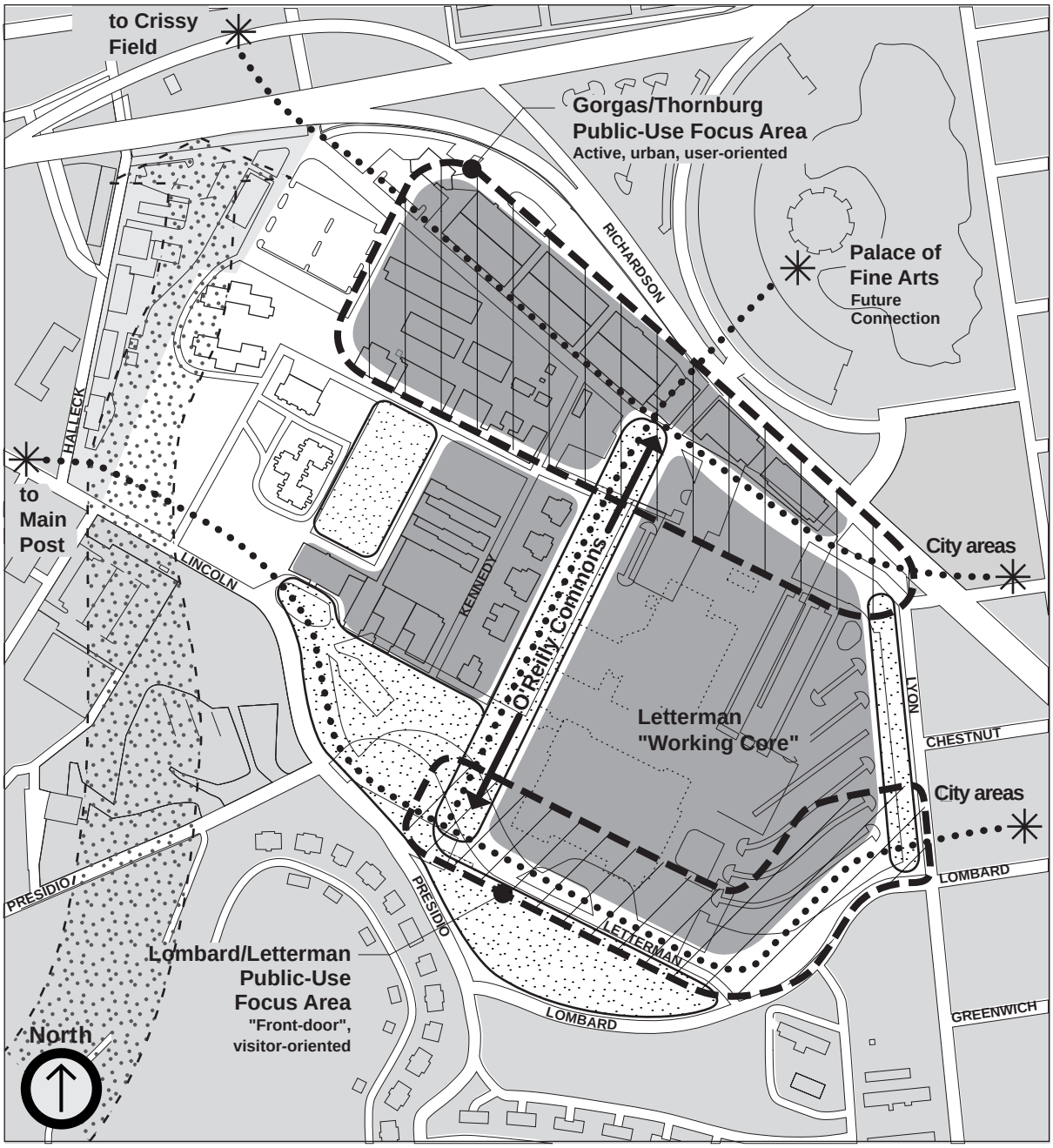


Figure B-10.
Land Use and Public Access

Built areas - present and future

Major open spaces

Tennessee Hollow Riparian Corridor

Public-use focus areas

Key visitor circulation

- *Gorgas Avenue/Thornburg Road Public-Use Focus Area*

  This area is expected to be the active, event-oriented, urban face of the Letterman Complex, as it contains the primary vehicular entry to the site. Retail, recreational, and cultural program uses that reinforce connections to nearby destinations such as Crissy Field, the Marina, and the Palace of Fine Arts may be accommodated in this area. Public access should be encouraged through strategic location of ground floor uses, where the upper levels of buildings may be devoted to more private uses.

- *O'Reilly Commons*

  An open space referred to as the O'Reilly Commons should be created between the historic O'Reilly Avenue houses and the new construction which faces it. This area should be a significant and usable public open space that is sensitive to the historic character of the O'Reilly houses and their landscapes, and makes the transition to the 23-acre new development area to the east. An average distance of 125 feet should be maintained between the face of the historic structures and the new buildings. New buildings which border the commons should present an inviting face to this public open space.

- *Letterman "Working Core"*

  The heart of the new development in the 23-acre parcel, east of the O'Reilly Commons and set back from the public edges along Gorgas Avenue and Lombard Street/Letterman Drive, may be seen as a "Working Core." This area could contain uses that are not highly public and are oriented to the users, employees, and residents of the Letterman Complex. Employee amenities, intimate courtyards and open spaces, parking structures, service and loading docks, and support facilities may be located in this "Working Core."

- *Other Sites*

  New uses and programs developed for the western part of the Letterman Complex, outside the 23-acre site, should be compatible with the historic buildings in which they would be located.

B. VISITOR EXPERIENCE

- The site is a part of a national park, open and accessible to all visitors. Places where visitors are welcome should be created, preferably within the "Public-Use Focus Areas," that showcase and interpret the history of the Letterman Complex and relate to other Presidio themes and national park visitor experience. This might take the form of a Letterman visitor center, a museum, a walking tour, or some other point of interest that can be developed in conjunction with the Presidio Trust and NPS. Alternatively, visitors might be invited to learn more about the working activities of tenants in the Letterman Complex by showcasing their work, their research into environmental policies, or their experimentation with technology, sustainable practices or other related activities.
- The future use of building 558 (identified in Figure B-1) may be as a visitor information center or similar public use building. Because this location receives a large amount of traffic from the Lombard Street and Presidio gates, it could easily become a special destination for visitors. Consider the benefits of establishing a relationship between building 558 and the O'Reilly Commons.

- Create attractive and inviting edges and entrances to the site. Connect to existing trails as well as to planned systems of pedestrian and bicycle paths.

C. PUBLIC ACCESS AND OPEN SPACE

- Create a network of public open spaces within the Letterman Complex, whose four major components are the O'Reilly Commons, the historic Lyon Street Windrow, the Letterman Courtyard (current parking lot west of the Thoreau Center for Sustainability) and the Lombard Green. They are identified in Figure B-11. Establish pedestrian links between these open spaces.
- Provide strong pedestrian and bicycle connections to link the Letterman Complex to adjacent neighborhoods and city destinations such as Crissy Field, Main Post Parade Ground, the Marina, the Golden Gate Bridge, and the Palace of Fine Arts.
- Develop a hierarchy of open spaces in the new Letterman development which respects existing patterns — from large, public open spaces to intimate courtyards, in a linked network that takes cues from historic patterns of development.
- Within new and rehabilitated historic structures in the Letterman Complex, locate retail, cultural, educational, and visitor-oriented uses on the ground floors of buildings as appropriate in order to create a pedestrian-friendly, visually interesting environment at the street level.

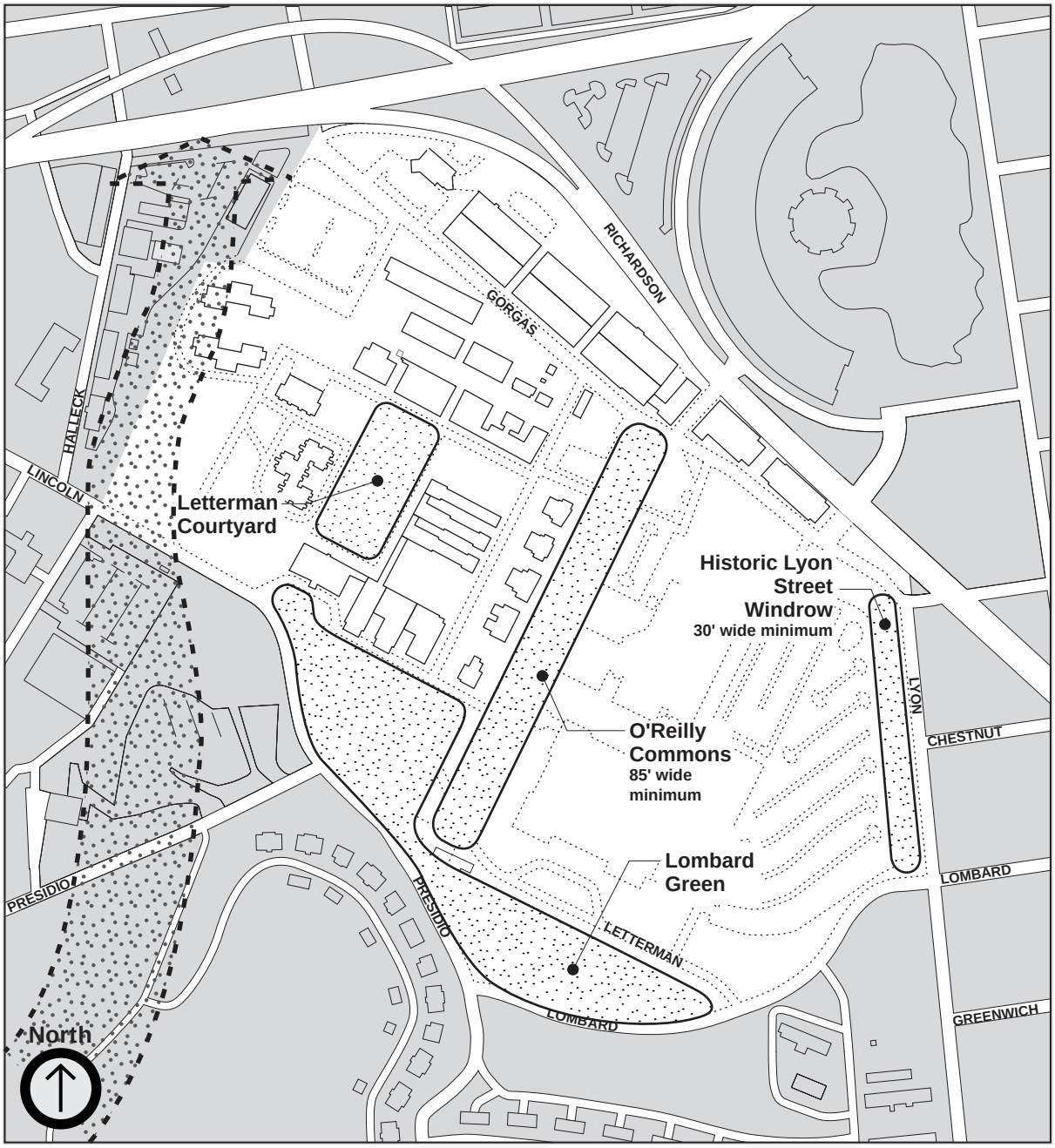


Figure B-11.
Major Open Spaces

Major open spaces

Tennessee Hollow Riparian Corridor

This section deals with design issues that involve the dynamic natural processes at work on the site. Geological, hydrologic, climatic, and ecological forces created the physical conditions that the Presidio's first inhabitants found. These factors continue to operate on the site independent of human activity, and they must be taken into account as people continue to use and transform the site.

The 60-acre Letterman Complex includes four significant natural components (shown in Figure B-12, Natural Landscape Elements, and Figure B-13, Critical Elements of Natural and Cultural Landscape). The first is the topography, which slopes gradually north toward San Francisco Bay and accounts for the site's even drainage pattern and its spectacular views to the Palace of Fine Arts and the bay. The second is Tennessee Hollow, a major riparian corridor remnant and a drainage way for the 31-acre El Polin Spring watershed; it runs along the western edge of the Letterman Complex. The third significant natural landscape component is the coast live oaks, palms, redwood and eucalyptus trees which occur in existing open space areas, and the fourth is the wildlife habitat which occurs in association with these trees. The natural landscape guidelines are intended to identify the site's important natural features and provide direction for appropriate design strategies.

3.2.1 Design Principles

- Respect and design with natural processes, systems and features—topography and soils, storm drainage, existing vegetation and wildlife habitat zones—at both the larger urban, and the more site-specific scale.
- Employ sustainable and energy efficient site design, construction and maintenance practices.
- Establish Best Management Practices for all natural landscape features and areas.

3.2.2 Guidelines

A. TOPOGRAPHY AND SOILS

- The change in elevation across the site in the north/south directions is approximately 55 feet. New development should respect and avoid alterations to this constant northward slope of the topography. Large-scale earthwork for foundations or underground structures should return the surface configuration to existing site contours. Landscape terracing is to be avoided.
- Although soils have been modified by water diversion, landfilling and construction, new development presents an opportunity to re-establish the quality of this resource. Enhance soil structure and fertility in all proposed planting areas and ensure that soil erosion and compaction is prevented during construction activity.

B. STORM DRAINAGE

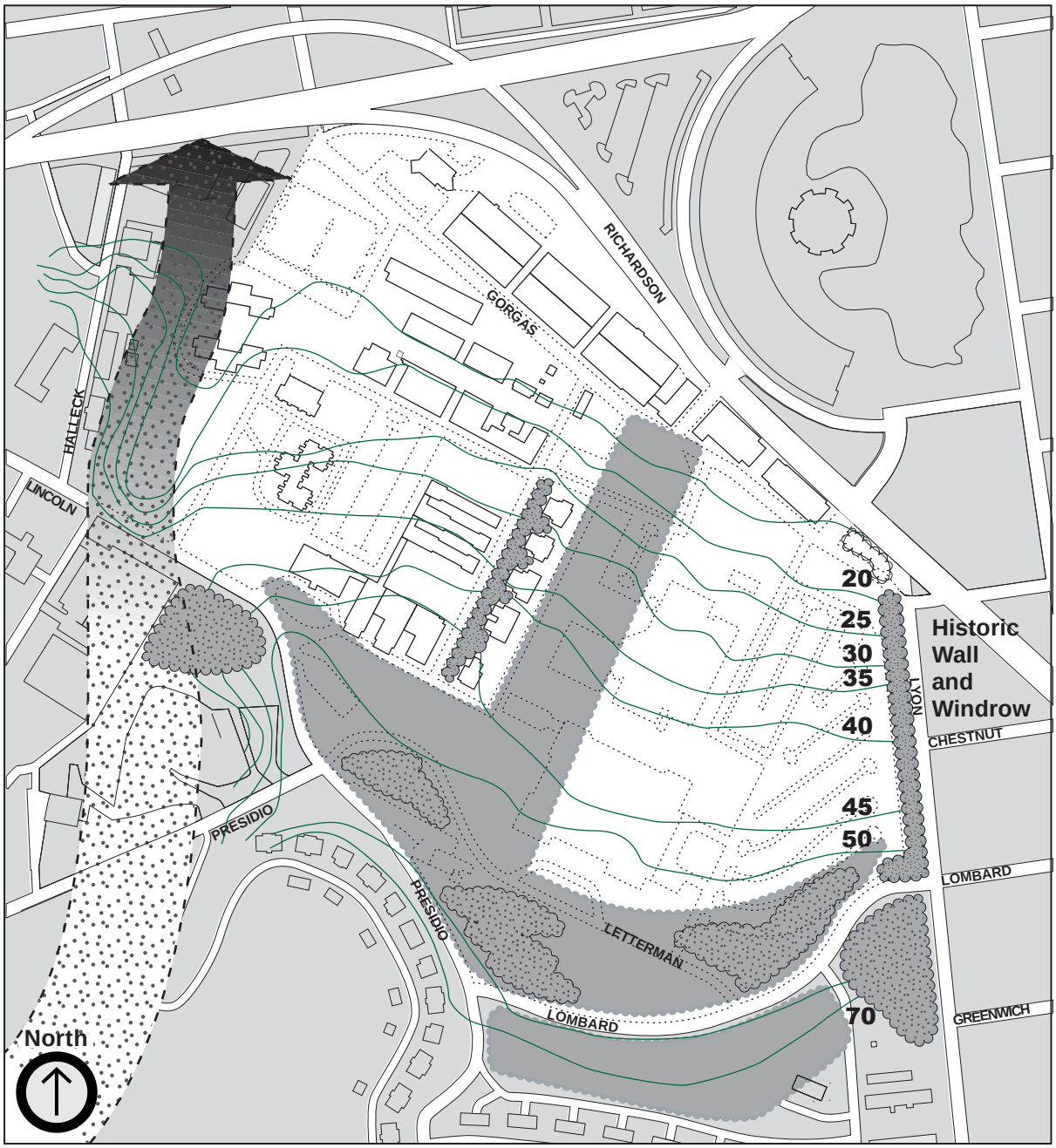
- Due to the topographic slope and direct connection to the bay, the quality and quantity of storm-water drainage is an important consideration for any new development. Incorporate the recommendations of the draft Presidio Storm Water Management Plan in the earliest design phases of new development.

Figure B-12.
Natural Landscape Elements

Tennessee Hollow Riparian Corridor

Existing Tree Masses

Wildlife Habitat



Tennessee Hollow Riparian Corridor

Historic or Significant Tree Plantings

Significant Cultural/Natural Open Space

50 General Slope (5ft. contours) down towards North

Figure B-13. Critical Elements of Natural and Cultural Landscape

- Consider future restoration opportunities for the Tennessee Hollow natural riparian corridor and linkage to the new wetland restoration at Crissy Field. Investigate the use of Tennessee Hollow for discharge of surface runoff from western portions of the Letterman Complex.
- Implement Best Management Practices during the design or re-design of storm-water drainage systems that discharge into riparian and wetland restoration areas to reduce potential impacts on water quality that could adversely affect aquatic and terrestrial habitat.
- Investigate the construction of surface collection and onsite infiltration systems for storm-water management.

VEGETATION

The designed landscape of the Letterman Complex provides a rich cultural context and a unique sense of place that sharply contrasts with the Presidio's forests and native plant communities. Ornamental plantings played a significant role in the design of this landscape and the functional evolution of the developed site. Fragments of the Letterman Complex's vegetation planted during the period of historically significant development still remain. These plantings, which have been present for 50 years or more, reinforce the role of the Letterman Complex landscape as an essential component of the National Historic Landmark designation. These plantings also contrast sharply with the landscape within the 23-acre LAMC and LAIR site, which represents a significant departure from the complex's original design intent and contains plants with strikingly different characteristics from historic species. The following broad objectives should guide the management of the Letterman Complex's designed landscape vegetation:

- Design and site new landscaping elements in keeping with the historic character-defining elements of the Letterman Complex while allowing changes to occur that will encourage vitality of the site.
- Retain the existing historic plantings and plant species, including all palm trees and the blue gum eucalyptus within the historic windrows, but avoid colonization of the eucalyptus through proper maintenance and management.
- Retain native plant species that currently occur along Lombard Street and in the existing open space areas along Letterman Drive, including all coast live oaks trees.
- Manage the health, vigor, and configuration of all species to be retained by following established horticultural and maintenance practices.
- Replace exotic and ornamental species as necessary with trees that have been identified in the draft Vegetation Management Plan as being suitable to supplement historically planted species. Ensure that the landscape plan utilizes the approved plant lists.
- Consider historic plant use and design intent, function, and potential impacts to native plants when selecting appropriate plant material for replacement vegetation.
- Acknowledge restoration and reconstruction of natural features as such; however, do not attempt treatments that try to recreate the appearance of an environment free of human intervention and use.
- Minimize the development of a landscape that requires intensive ongoing maintenance and energy expenditures. Plants should be disease- and pest-resistant, water efficient or drought tolerant, adapted to the

site's microclimate, and require minimal ongoing maintenance. Plants that require intensive maintenance such as frequent pruning and irrigation should be carefully considered before planting. Plants should also have the ability to withstand heavy recreational use and foot traffic.

- Minimize storm-water runoff by maximizing groundwater percolation and storm water drainage.

D. WILDLIFE HABITAT

The wildlife habitat areas that have been identified within the Letterman Complex are important primarily as nesting areas for migratory birds. Although these areas are fragmented and isolated and do not provide as much resource value as contiguous habitat areas, they should be retained. They are of relatively high habitat value despite their limitations because habitat is so scarce in the urbanized city of San Francisco. The mature coast live oaks and palm trees in the existing open space areas are especially valuable.

- Protect and enhance designated wildlife habitat areas (coast live oaks and palms) through the employment of management treatments and practices such as restricting the size of the work area, establishing appropriate buffer zones, avoiding work when soils are wet and prone to compaction, and careful training of work crews to reduce potential impacts on soils and vegetation.
- Ensure protection of nesting birds during construction and employ Integrated Pest Management practices in design solutions.
- Direct storm-water drainage as appropriate to allow and enhance the future habitat restoration proposed for Tennessee Hollow and the Crissy Field wetland. Ensure water quality is adequate to support habitat.

The cultural landscape guidelines deal with issues that relate to the human occupation and transformation of land over time. The new programs proposed for the Presidio are a continuation of the long history of human use and intervention in the area. Since the eighteenth century, the Presidio's natural landscape and form of the site has evolved and changed because of human activity; remnants of this process include infrastructure, buildings, and designed open spaces in which occupants transformed vegetation, drainage, and topography.

In the 1996 publication, *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes* (NPS 1996), landscapes like the Presidio are designated to be cultural landscapes. This is defined as: "geographical area[s] (including both cultural and natural resources and wildlife or domestic animals therein) associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values." The Presidio can be described more specifically as a historic designed landscape, which is "consciously designed or laid out by a landscape architect, master gardener, architect, engineer, or horticulturist according to design principles" and may display aesthetic values or be associated with significant practitioners, events, or trends in landscape architecture.

The Letterman Complex includes traces and remnants of historic landscape features and components at a variety of scales: the historic Letterman Hospital complex; O'Reilly Avenue, Thornburg Road and Gorgas Avenue; the Presidio wall at Lyon Street and its associated windrow; the Lombard Street Gate, and sections of plantings which indicate the original alignment of Lombard Street.

The *Secretary's Standards* set forth guidelines for the rehabilitation of cultural landscapes on the premise that sites evolve over time, defining rehabilitation as "the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values." The principle of rehabilitation is that new development should respect the historic character of the site without simply replicating it. Extant and non-extant features of the cultural landscape should be used as a source of invention and inspiration, and significant existing features should be preserved and enhanced. However, new designs should not attempt to reconstruct or imitate what existed previously in ways that are falsely historical or inappropriate for current uses.

The redevelopment of the Letterman Complex provides the opportunity to invigorate and enrich a unique cultural landscape. For further guidance in this process, consult both the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (NPS 1996).

3.3.1 Design Principles

- The design of new and rehabilitated landscapes should acknowledge both extant and non-extant cultural landscape elements. Figures B-14 and B-15 indicate the significant contributing elements of the cultural landscape from the site's period of significance. They are shown in relation to important features of the natural landscape in Figure B-13.

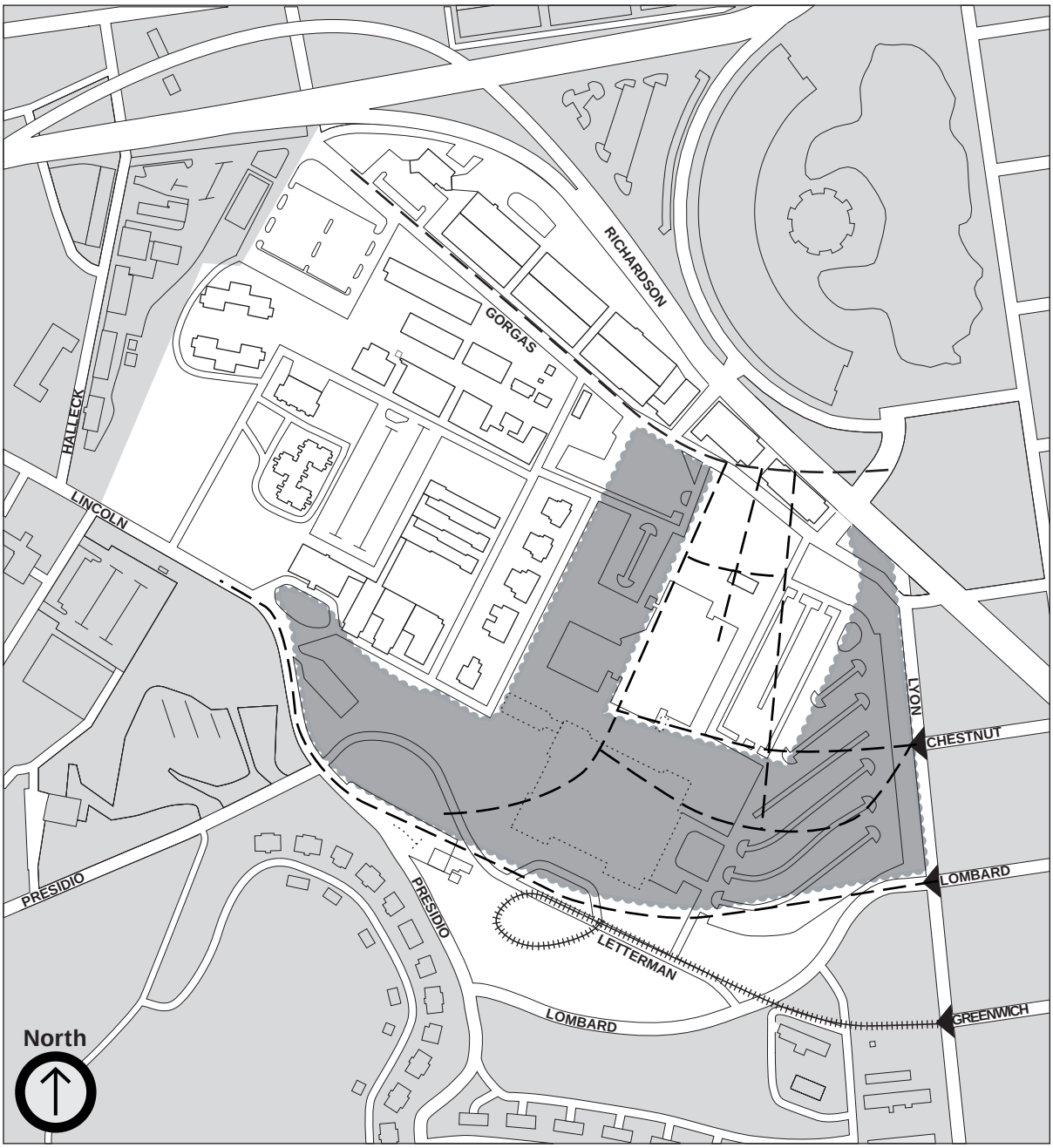


Figure B-14.
Cultural Landscape Infrastructure

Formal Landscape Zone – Panama-Pacific International Exposition and East Hospital

Radial Street Pattern – Panama-Pacific International Exposition

Historic MUNI Line

Points of Entry

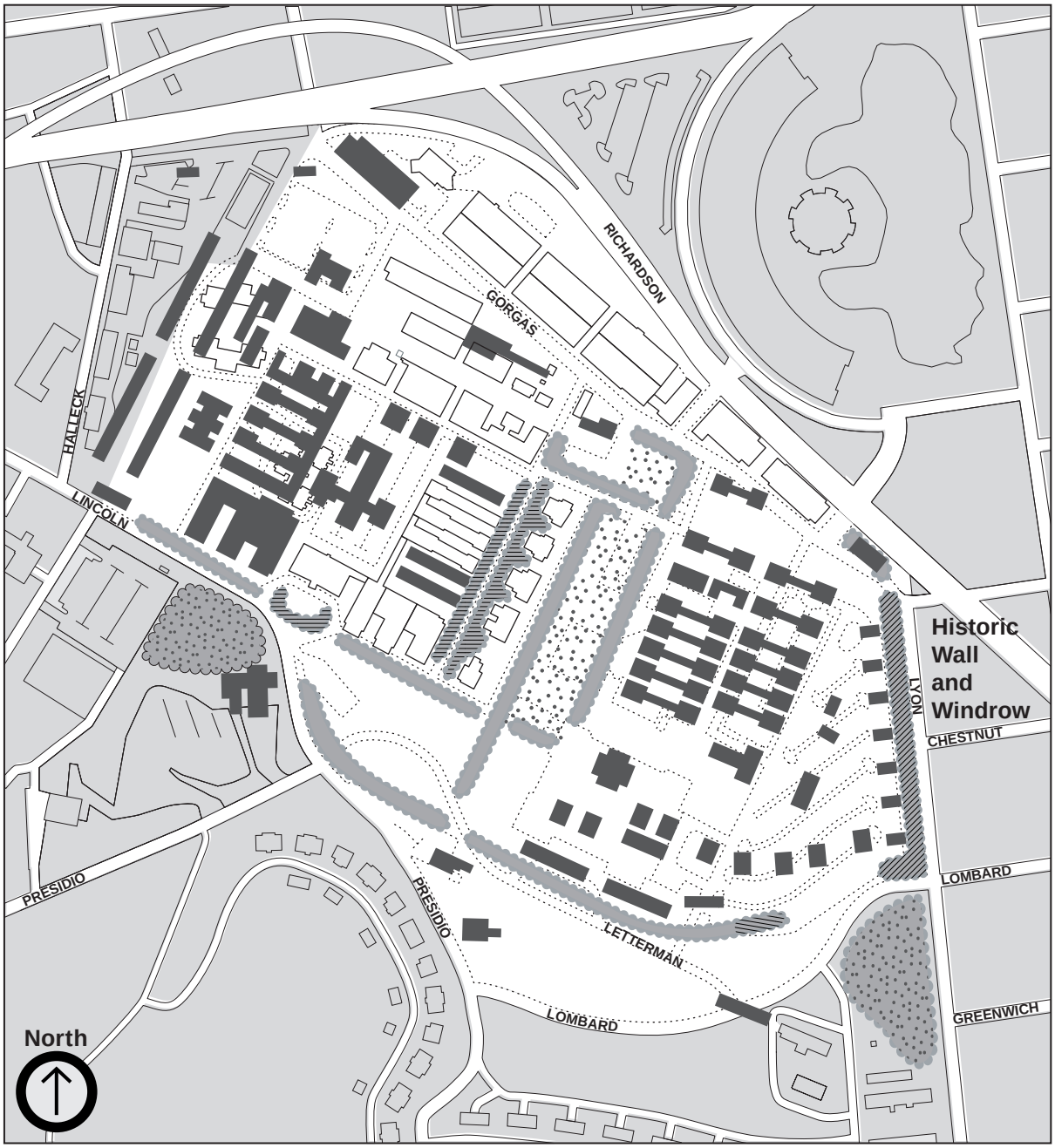


Figure B-15. Cultural Landscape Elements

Past Footprints of Historic Letterman Hospital

Historic Green Space

Historic Landscape Elements - no longer extant

Historic Forest Remnants

Historic Landscape Remnants

- Future development at Letterman should take cues from aspects of the cultural landscape. In particular, the future pattern of development should consider the layout of historic examples such as the historic hospital complex and the Panama-Pacific International Exposition when determining the orientation of streets and buildings, dimensions for block faces, and the locations of view corridors and a functional public open space network. (See preceding section for a discussion of the historic evolution of the Letterman Complex.)
- A fine-grained pattern of development is encouraged, with an emphasis on attractive and accessible, human-scale design, sensitive to the existing visual character of the Presidio.
- Open, inviting, and accessible designs that orient primary buildings and entrances to public streets and open spaces are recommended. Development patterns reminiscent of a "gated" community or exclusive campus are strongly discouraged.
- Opportunities should be sought that establish a development pattern that easily integrates with surrounding Presidio and city neighborhoods and positively responds to edge conditions.

3.3.2 Guidelines

A. LANDSCAPE FRAMEWORK

1. *Spatial Organization*

The Army and the Panama-Pacific International Exposition represent the two major design forces at the Letterman Complex. Spatial elements of their designs included: ornamental planting; historic open areas like the greensward along O'Reilly Avenue; building complexes; walls and gates; streets and roads; and the system of runnels that drains the site.

2. *Topography and Drainage*

- Restore the existing historic Tennessee Hollow drainage on the site to flow into the Crissy Field wetland. Future site plans and environmental analysis should include planning for restoration of the stream corridor, maintaining storm-water runoff water quality through bio-filtering, and ensuring a stream corridor buffer area. The buffer width should be supported by information from technical experts.
- Respect, and avoid alterations to, the constant northward slope of the topography. Large-scale grading for foundations or underground structures should return the surface configuration to its historic slope and terracing should be avoided.
- Consider the use of a system of surface drainage channels with the scale and character of the historic runnel system for the removal of storm-water runoff.
- Avoid excess pavement, particularly in close proximity to the Tennessee Hollow riparian corridor.

3. *Vegetation*

- Planting should be considered as part of the built structure of the new Letterman Complex. The type and character of plant material chosen should be consistent with the goals and objectives of the draft

Vegetation Management Plan and complement the spatial organization and architecture of new development.

4. *Special Features*

- Water Features: Consider the character of historic water features—small interior courtyard fountains and the surface runnels—in the design of new water features, if any.
- Site Structures, Furnishings and Elements: The guiding principles for the placement of site furnishings in all areas of the complex are respect for historical character and reduction of impact on the landscape.

  Benches and trash receptacles may be located on the porches of buildings, at entrances, and along lawn edges and sidewalks. In historically significant areas, they should be removable to avoid permanent impact. If possible, historical documentation should be used to inform siting decisions.

  Picnic tables should not alter the appearance of historic buildings significantly. They should be placed in secondary but accessible areas, for instance, in courtyards or behind or beside buildings, where they are convenient to employees but unobtrusive.

  Bicycle racks should be placed outside of areas with a high degree of historic integrity. Bicycle racks for visitors should be located near building entries. Bicycle racks for employees may be grouped and should be located behind buildings, near service areas, or in car parking areas. If racks are not located on existing concrete or asphalt paving, they should be located on permeable paving such as gravel or crushed fines.

  The selection of site furnishings such as seating, lighting, and small-scale site features should be coordinated with the Presidio Trust in order to maintain compatibility with park-wide site furnishing standards.

B. PATTERN OF DEVELOPMENT

1. Orientation of Streets and Buildings

The general orientation of streets and buildings on the 23 acres should be based on historic patterns of development. At the O'Reilly and city edges, the existing street grids of the remainder of the Letterman Complex and the adjacent city district should determine the pattern of new streets. At the heart of the site, new development should be oriented towards designated view corridors. Figure B-16 illustrates these patterns.

2. *Spatial Organization*

The relationship of indoor and outdoor spaces in new development should consider lessons provided by historic built patterns. In general, an approach where buildings are located along streets with courtyards and open spaces located in block interiors is preferred. The outcome—a fine-grained texture of buildings and open spaces that respect the human scale—should be a defining characteristic of new development within the 23-acre site.

3. Building Entrances

Building entrances should be oriented to major streets and open spaces as appropriate. Visually interesting and pedestrian-friendly ground floor uses and treatments should be provided. Placement of primary building entrances facing public streets is encouraged. Secondary entries may be provided through courtyards and alleys.

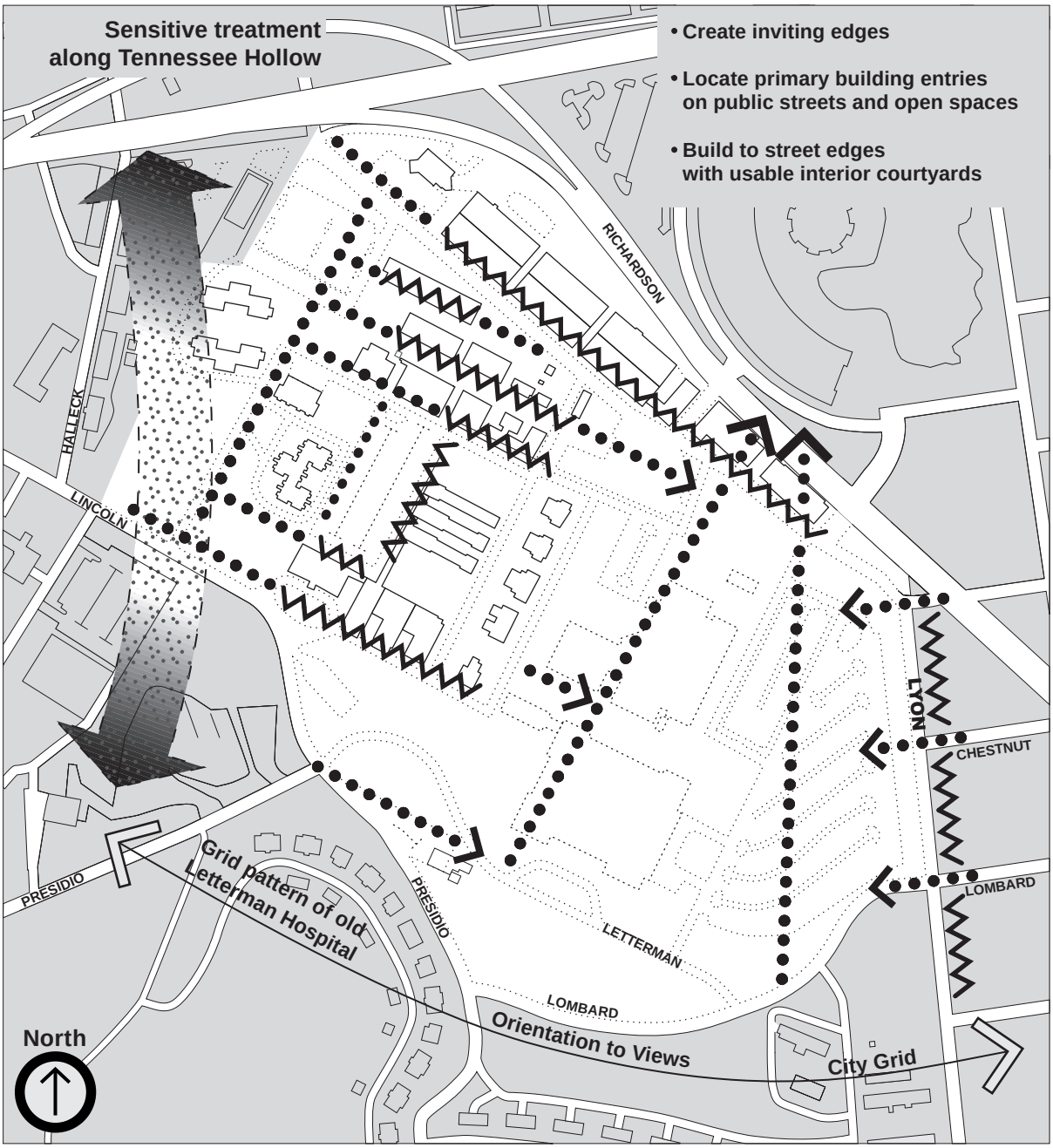


Figure B-16.
Pattern of Development

Tennessee Hollow

Strong Built Edges

Suggested Circulation

Views into and out of the Presidio are constant reminders of its unique place in the geography of San Francisco and the bay. From the Letterman Complex, the visibility of cultural monuments like the Golden Gate Bridge, the Palace of Fine Arts, and the San Francisco skyline locates the landscape in the framework of the city; the visibility of important natural features like the Presidio Ridge, the bay, and the Marin Headlands locates the site in the ecological systems of the region. Close and distant views of the Letterman Complex from outside the Presidio provide both information about the site's character as a natural and cultural area and cues about entry and access.

New development should be sited and scaled to preserve and enhance scenic views from the complex; as in the past, street edges, interstitial spaces between buildings, and planting should be located to frame important sites. New buildings and plantings should also direct views into the complex from its edges and preserve views into and beyond the complex from adjacent neighborhoods at higher elevations.

3.4.1 Design Principles

- Preserve and enhance scenic views and historic vistas from the Letterman Complex to surrounding visual landmarks including the Golden Gate Bridge, the city skyline, the bay, the Presidio Ridge, and the Palace of Fine Arts.
- Preserve and enhance scenic views and historic vistas into and out of the historic hospital complex to the new redevelopment site to create visual linkages that tie together the 60-acre site.
- Create opportunities for interesting landmarks and framed views into the Letterman Complex from its edges.
- Protect the regional visual character of the Presidio as seen from surrounding residential areas.

3.4.2 Guidelines

A. VIEW CORRIDORS

- Preserve and enhance important public view corridors indicated in Figure B-17. Extend the Thornburg Road view corridor to maintain and enhance its distant views towards the Golden Gate Bridge and the San Francisco skyline. Frame views on axis with Letterman Drive to the city and Presidio Ridge. Also, create a minimum of two view corridors within the 23-acre site oriented towards the Palace of Fine Arts.

B. VIEWS INTO THE SITE

- The most significant views into the Letterman Complex from its edges are from the Lombard Street Gate entrance and from the entry at Richardson Avenue. It is recommended that views from these locations be framed and sensitively designed to provide an inviting glimpse of the site. These views may be focused on a significant structure or landscape feature, or be left open to reveal a vista through the site. The objective is to attract visitors and provide site identity for passers-by.

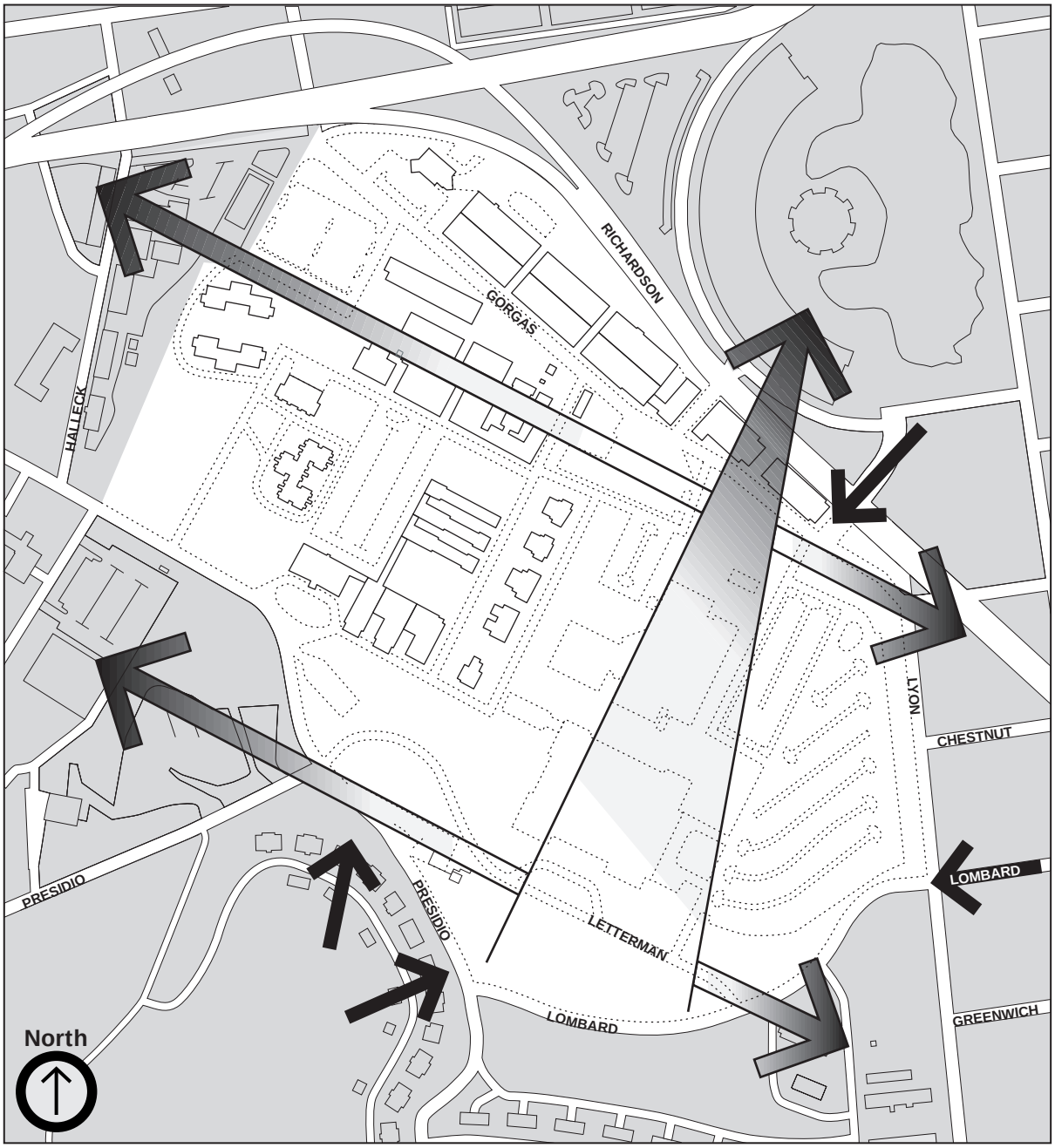


Figure B-17.
Scenic Views

Major View Corridors

Key Views Into Site

C. VIEWSHEDS

- Recognize that surrounding residential neighborhood located at higher elevations within the Presidio and the city look down into and across the Letterman Complex. Be sensitive to this panoramic viewshed and create an attractively designed roofscape for the new complex. (See roofscape guidelines in Section 3.5, Building Form.)

Excellence in design, for both rehabilitation and new construction projects, is a primary goal. While suitable for contemporary use, new construction should also be compatible with the historic setting through sensitive treatments of such elements as height, massing, scale, materials, and color. The fundamental character-defining features of existing historic buildings at the Letterman Complex, identified in Section 2.5, Architectural Characteristics of the Letterman Complex, should be considered, and to the extent possible, should inform the architectural character of new development.

The guidelines that follow provide general direction about overall form and character as well as specific recommendations for edge treatments, height and bulk, architectural compatibility, and sustainable design practices.

3.5.1 Design Principles

- Complement the existing historic fabric and respect the site's National Historic Landmark setting in all new construction within the 23-acre site.
- Promote architectural excellence while respecting the setting and historic character of the area.
- Encourage new development to be compatible with the scale, architectural character, and pedestrian-friendly quality of existing historic buildings through sensitive use of color, texture, materials, fenestration, and building articulation and height.
- Promote environmentally sensitive and energy-efficient building design that helps achieve the Presidio's goal of being a model of sustainability.
- Maintain and accentuate the natural topography of the site.

3.5.2 Guidelines

A. OVERALL FORM AND CHARACTER

- Overall built form should step down towards the north, respecting the natural topography of the site.
- Site layout and building clusters should respect historic patterns of spatial organization and be compatible in scale with existing historic buildings. A fine-grained texture of buildings is desired, incorporating courtyard forms and human-scaled building masses.

B. EDGE CONDITIONS

New construction should respect the character of existing natural and built edge conditions. Significant edges and recommended strategies are outlined below. Refer to Figure B-18.

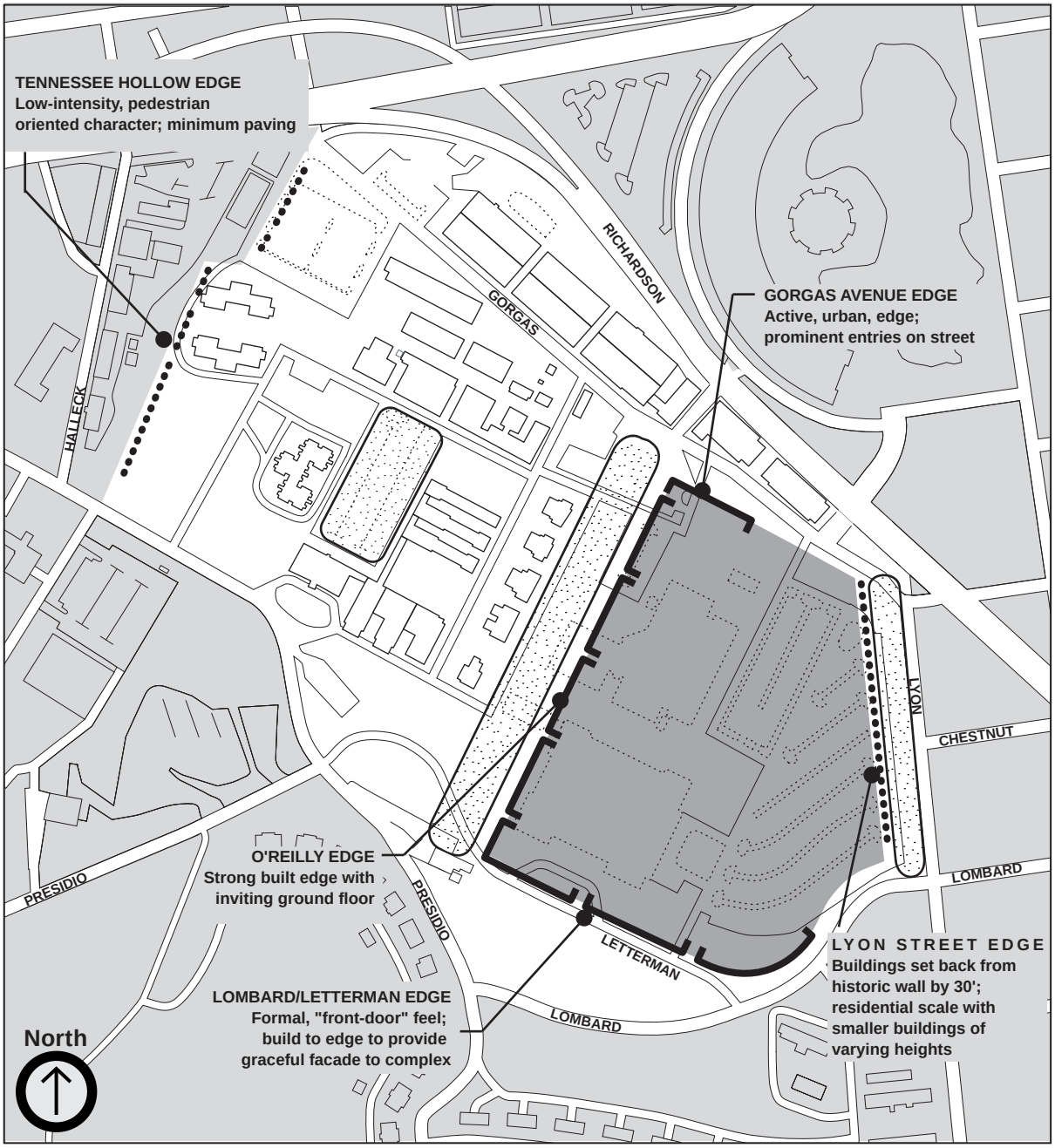


Figure B-18.
Edge Conditions

Strong Built Edge

Lower-Intensity Edge

Major Open Space

Parcel Area

Along Lombard Street/Letterman Drive

- This is the "formal" front door to the Presidio. This edge of the site should present a gracious and welcoming face to Presidio visitors and evoke the park's unique setting. Locating buildings so as to hold the street edge and form a dignified façade to the new complex, visible to visitors entering and proceeding along Lombard Street is encouraged (see Figure B-18). Publicly accessible uses on the ground floor, significant building entries, and careful massing and framing of view corridors to the Palace of Fine Arts should define the character of this edge.

Along Gorgas Avenue

- As the primary vehicular entrance into the Letterman Complex, this edge is expected to be active and urban. As one of the few remaining industrial streetscapes in the Letterman Complex, this edge should also retain an architectural character that is simple and functional. This area would provide a first glimpse of the new 23-acre development for visitors and users of the complex. Buildings along this street should thus accommodate a variety of inviting public uses, be built to street edges where possible, and have entries facing the street. The scale and architectural character of new buildings along Gorgas Avenue should relate to the austere, functional character of existing buildings.

Along O'Reilly Common

- Provide a building edge which gives definition to the eastern side of O'Reilly Commons. Encourage public uses on the ground floor, with frequent opportunities to enter buildings. An average distance of 125 feet should be maintained between the face of the historic structures on O'Reilly Avenue and the face of the new construction. The character of new buildings in this zone should provide a transition from historic to new—a counterpoint to the historic O'Reilly houses across the commons.

Along Lyon Street

- Maintain and enhance the historic wall along this edge. Buildings should be set back from the wall by at least 30 feet of green space that serves as a buffer. Rehabilitation and additional planting of trees to enhance the existing row of trees is encouraged. Consider breaching the wall on axis with Chestnut Street to reintroduce this historic pedestrian connection into the complex. Buildings along this edge should be compatible in scale with the residential character of buildings along Lyon Street.

Along Tennessee Hollow

- Establish an easement along Tennessee Hollow for future restoration of the unique natural character of the riparian corridor. Any landscape or site improvements planned for this zone should be set back from this easement and should be low in scale and intensity, and compatible with the pedestrian-oriented character of the corridor.

C. HEIGHT AND BULK

- Allowable maximum building height varies in the two parts of the 23-acre site, as shown in Figure B-19. It shall be 60 feet south of Edie Road (Zone A). To the north of Edie Road the maximum height shall be 45 feet. Building height is measured from the finished grade to the top the of building. The top of the building is

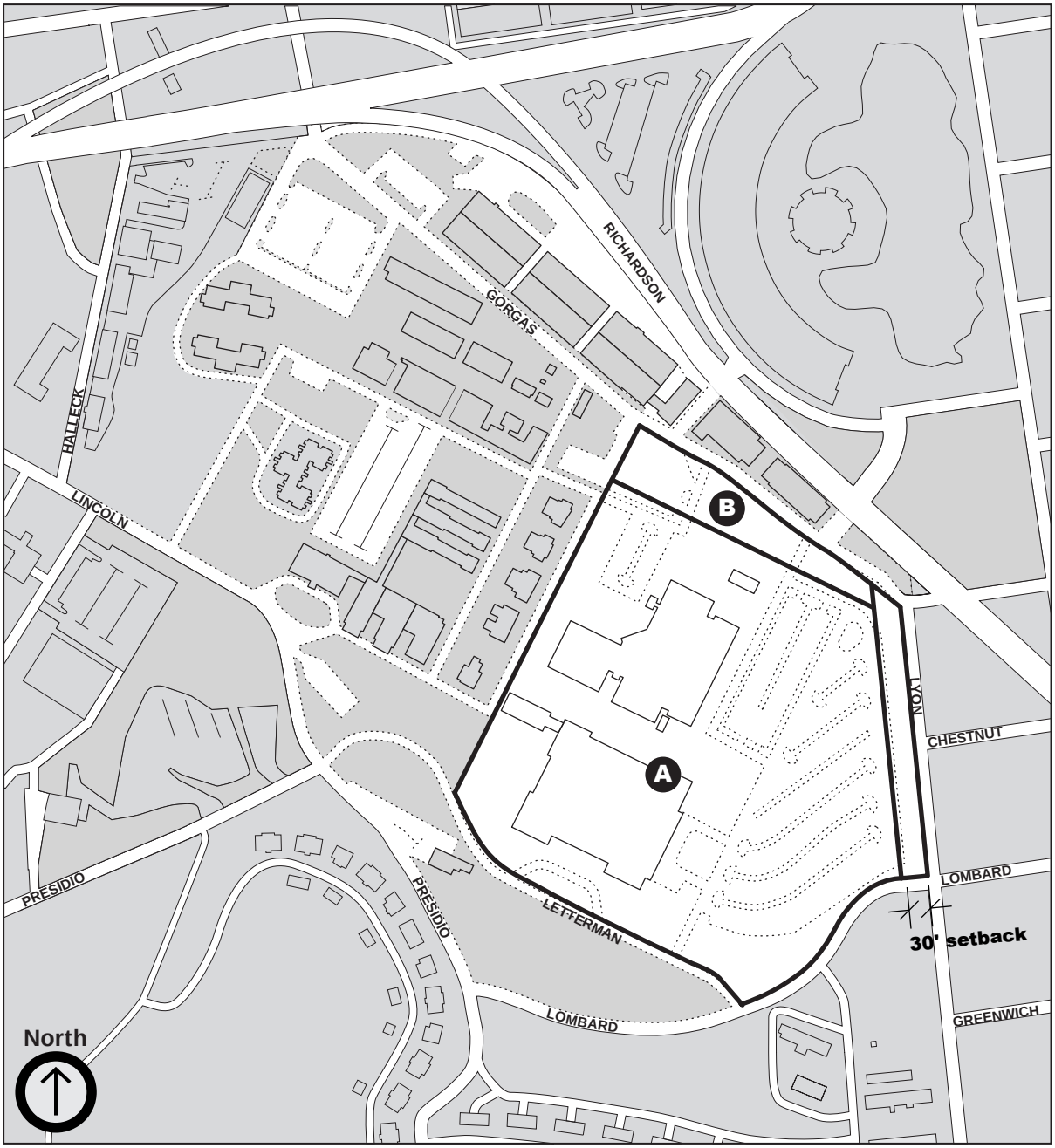


Figure B-19.
Height Zone Diagram

A Zone A. Maximum height: 60 feet

B Zone B. Maximum height: 45 feet

defined as the finished roof in case of flat roofs or the top of a parapet, whichever is greater, and the average height of the roof rise in the case of pitched or stepped roofs. On a sloping site, this measurement is taken at the median grade height of each building segment or face. Total individual building height is calculated by determining the average height of all individual building faces.

- Building massing and siting should accentuate views, especially along designated view corridors.
- New buildings should be compatible with the surrounding residential neighborhoods and historic buildings. Refer to the following section on architectural compatibility for guidelines relating to building modulation, scale, and character.

D. ARCHITECTURAL COMPATIBILITY

- *Building Form* – Design of new buildings should be informed by and compatible with the character-defining features of existing historic buildings. Some of these features include:
  - Simple, functional building character.
  - Complexes formed by smaller buildings connected with covered breezeways.
  - Buildings clustered around courtyards and intimate outdoor spaces.
  - Windows placed in a rhythmic, repetitive pattern on building elevations.
  - Due to the topography of the site, basement stories visible and at grade on the down-slope side of most buildings.
  - Projecting eaves and other architectural details that create horizontal shadows and accommodate decorative architectural elements.
- *Architectural Character* – High-quality design which considers its historic setting while providing the best in current design appropriate to the future of the Letterman Complex is encouraged. The new buildings should be differentiated from the old and compatible with the massing, size and scale of the historic hospital complex.
- *Building Exteriors* – Building exteriors should be made visually interesting through sensitive placement of entrances, windows, articulation, and architectural details that animate the surface and contribute to the play of light and shadow. In particular, multiple entries, inviting walkways, transparency of uses, and other street level details that contribute to a pedestrian-friendly character are encouraged.
- *Color and Materials* – It is recommended that the color palette for new building exteriors complement the range of colors predominant in the Presidio. Use of reflective materials and bold colors that detract from the overall visual character of the historic Letterman Complex is prohibited.
- *Roofscape* – Because the roofs of Letterman Complex buildings would be visible from higher surrounding areas, they should be visually pleasing and use compatible colors. Mechanical equipment should be designed as a component of the building and not appear to be an add-on element.

E. REHABILITATION OF HISTORIC BUILDINGS

- Rehabilitation of historic buildings in the Letterman Complex should preserve their character while modifying and upgrading them for contemporary use. For more detail, refer to the *Guidelines for Rehabilitating Buildings at the Presidio of San Francisco* (NPS 1995).

F. SUSTAINABILITY

- A primary Presidio-wide goal is the promotion of sustainable building practices. Building design that exploits the benefits of daylight and fresh air through site and plan layout, orientation, careful placement of windows and skylights, and strategic use of vegetation is encouraged.

- In addition, building design and techniques that conserve energy and water, use environmentally responsible and recycled materials, reduce waste, and promote healthy environments are strongly encouraged. For guidance on sustainable approaches, two references will apply. For rehabilitation of existing historic structures in the hospital complex within the 60-acre Letterman Complex, refer to the draft *Green Building Guidelines for the Presidio of San Francisco* (Presidio Trust 1999). For new construction located on the 23-acre site, the U.S. Green Building Council's Leadership in Environmentally Efficient Design (LEED) guidelines and rating system will be used by the Trust for evaluating building performance. A LEED performance level would be established by the Presidio Trust prior to the building design phase.

3.6 PLANNING GUIDELINES: ACCESS, CIRCULATION, AND PARKING

With its adjacent highway access and proximity to major San Francisco streets, the Letterman Complex is one of the most accessible sites within the Presidio. One of the key transportation objectives for the Letterman Complex is to decrease dependency on the automobile and encourage alternative modes. By virtue of its location and density, the Letterman Complex is ideally suited to promote this goal by enhancing pedestrian and bicycle connections, and improving transit access. In addition, safe and efficient traffic flow could be readily achieved through better integration of the complex with local and regional systems. The following guidelines offer recommendations to achieve these goals.

3.6.1 Design Principles

- Serve the mix of uses at the Letterman Complex with a range of transportation modes consistent with Presidio-wide transportation strategies.
- Develop a transition from the informal design of the Presidio's primary road system to a more typical urban street system within the existing Letterman Complex.
- Make pedestrian and bicycle connections within and beyond the Letterman Complex and link with local/regional streets, trails and destinations. Enhance pedestrian and bicycle travel and safety in this area.
- Promote transportation strategies that decrease dependence on automobiles and facilitate transit use.
- Promote energy-efficient and sustainable transportation practices—promote a strong jobs/housing balance, encourage use of alternative modes of transportation, and institute Transportation Demand Management policies.
- Minimize the effect of Presidio traffic on surrounding neighborhoods and discourage offsite parking.
- Minimize the effect of traffic related to the 23-acre development on the smaller historic roads in the Letterman complex such as Torney, O'Reilly, and General Kennedy avenues.

3.6.2 Guidelines

A. SITE ACCESS

- The entrance from the Lombard Street Gate should retain its historic importance as a primary vehicular entrance into the Presidio as a whole and for people on foot, bicycle, or public transit. The new entrance from Gorgas Avenue should serve as the primary vehicular entry into the Letterman Complex (see Figure B-20).

B. PEDESTRIAN, BICYCLE, AND VEHICULAR ACCESS

- Establish a clearly defined hierarchy of circulation routes within and to the site, as represented by the following categories:

  Regional Highway Access – Doyle Drive and Richardson Avenue

  Primary Vehicular Streets – Gorgas Avenue, Lombard Street/Letterman Drive, Halleck Street

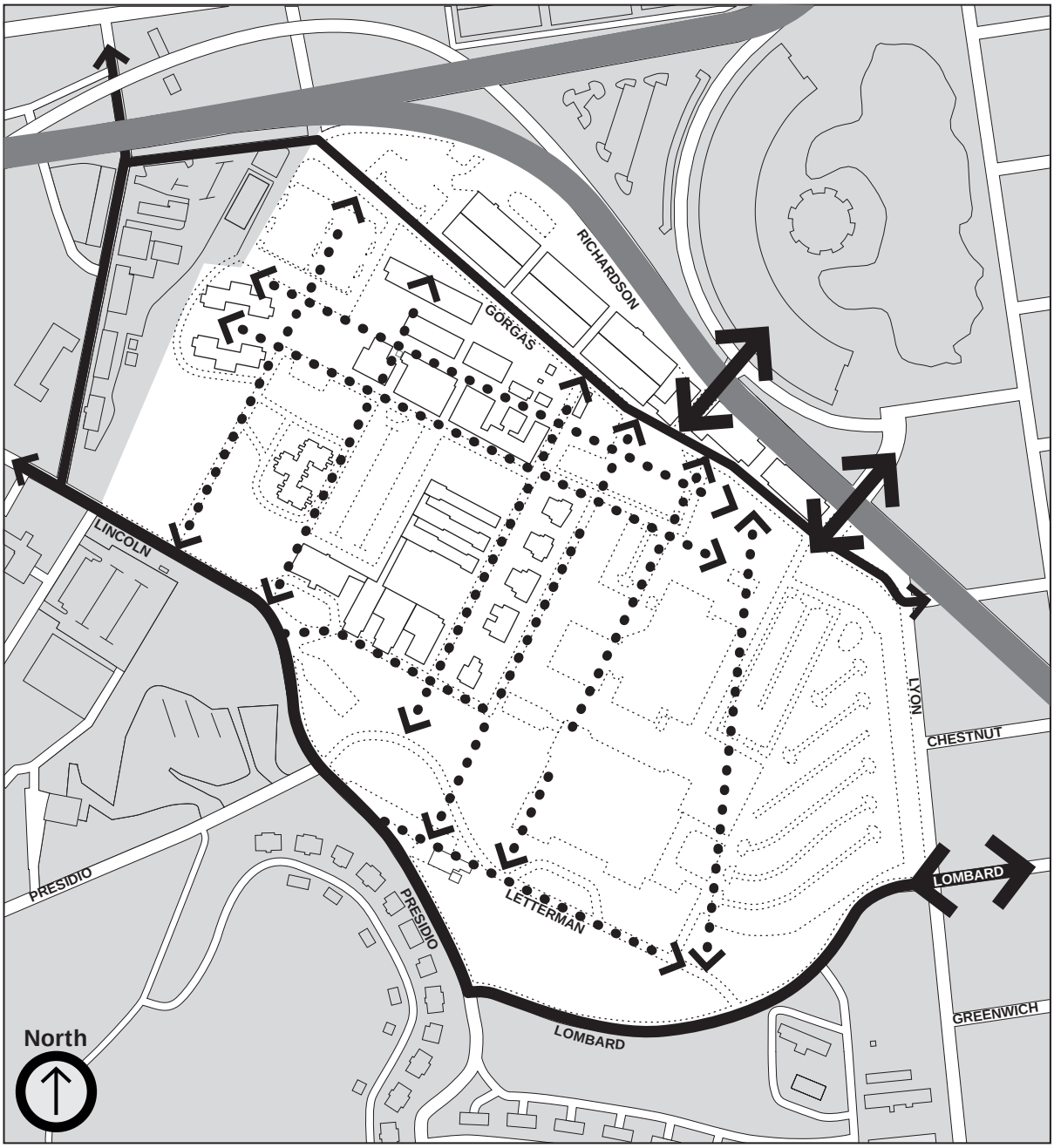


Figure B-20.
Vehicular Circulation

Internal Circulation Corridors
General orientation to be determined by:
- Existing streets
- View corridors
- City grid
- Cultural pattern of development (including precedents of pedestrian connections through public areas of buildings)

Site Entry/Exit

Highway Access

Primary Vehicular Streets

Internal Circulation (vehicular and/or pedestrian) – Thornburg Road, Girard Road, General Kennedy Avenue, Torney Avenue, O'Reilly Avenue, and new streets within the 23-acre site

Bike and/or Pedestrian Trails – Tennessee Hollow future trail, O'Reilly Avenue, pedestrian path at Chestnut Street, Gorgas Avenue, Lombard Street/Letterman Drive, and Thornburg Road.

- Encourage a rich pedestrian character within the Letterman Complex and encourage user-friendly access to surrounding Presidio and city destinations. For generalized locations of pedestrian and bike connections, refer to Figures B-21 and B-22.
- Consider re-establishing a pedestrian entrance on axis with Chestnut Street, along the historic Lyon Street wall.
- Sidewalks and pathways should be appropriately lit, and streetscape elements such as paving, plantings, benches, trash cans, tree grates, kiosks, bike racks, etc., should be provided and be consistent with plans for Presidio-wide improvements.

C. TRANSIT ACCESS

- Current bus stops and MUNI and Golden Gate Transit routes that serve the site are indicated in Figure B-23. Consider integration of this transit network in new designs for the area. Coordinate with the Presidio Trust towards developing better transit access, convenient new stops, and an internal Presidio shuttle route.
- Acknowledge the potential for future water transit service at Crissy Field and allow for connections to it in new designs for the site.
- Encourage innovations in transit and develop strong Transportation Demand Management policies in order to encourage transit use and decrease dependence on the automobile.

D. PARKING

- Remove and reconfigure existing large surface parking lots.
- Creation of large surface parking lots is strongly discouraged. Where surface parking is provided, landscape treatment should provide a visual buffer at the edges and frequent relief of green space and shade within the parking areas.
- Underground parking lots (with careful consideration of archeological resources) and parking structures that are adequately shielded from public view are preferred.
- Street parking is encouraged, particularly in the public-use focus areas, for short-term parking.
- Designated bus parking should be provided in a convenient location that is integrated into Presidio-wide transit and shuttle routes, and does not create barriers to pedestrian enjoyment or interfere with significant views.
- Consider minimizing stormwater drainage and management through appropriate design and use of surface materials in parking lots.

E. SIGNAGE AND WAYFINDING

- New signage—public, residential, and business-related—should provide adequate information and direction to visitors while retaining the visual character of the historic district and maintaining consistency throughout the Presidio.
- The design and placement of all tenant signs should be coordinated with the Presidio Trust to ensure compatibility with Presidio-wide sign standards.

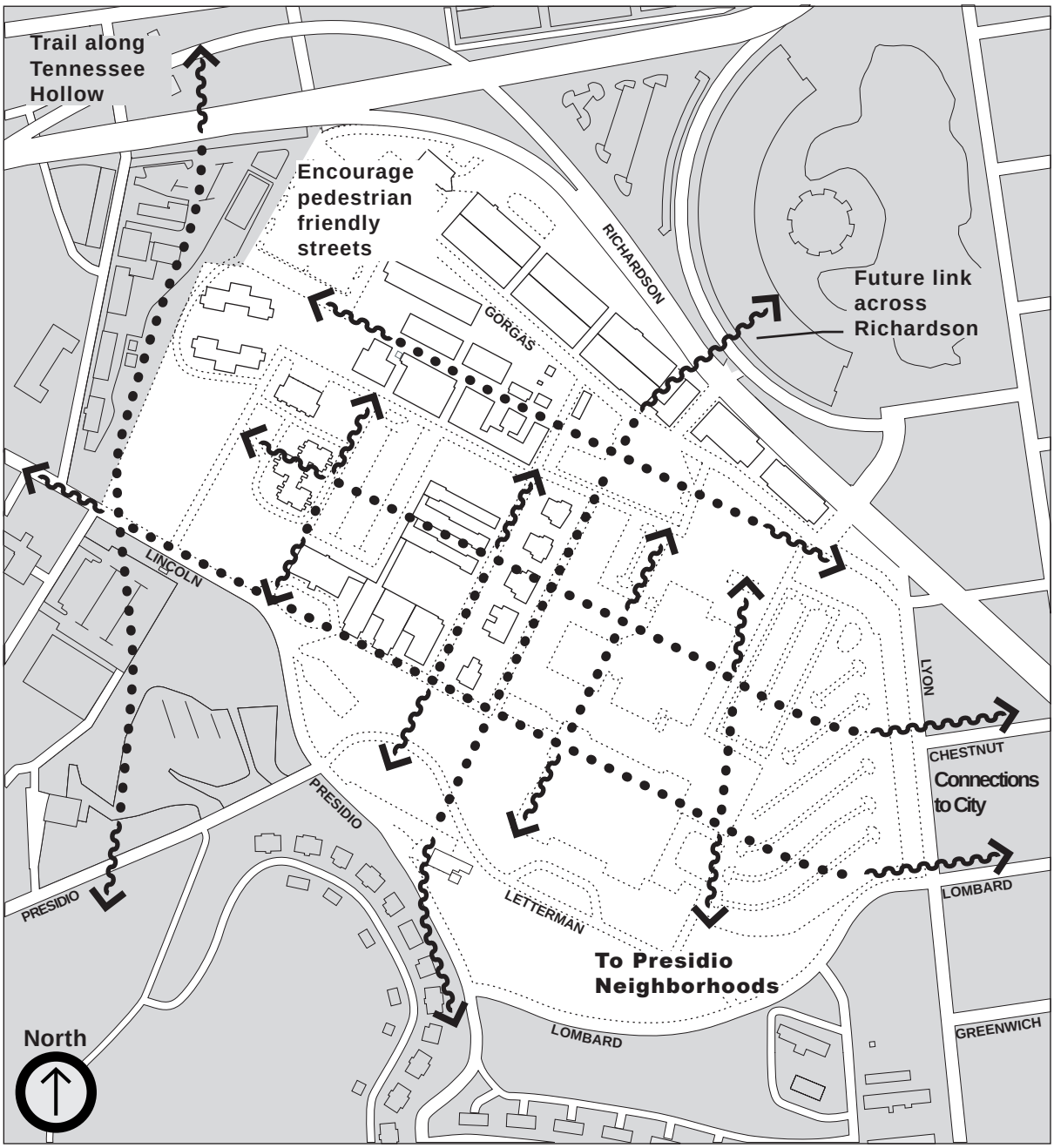


Figure B-21.
Pedestrian Circulation

Generalized pedestrian connections through the site

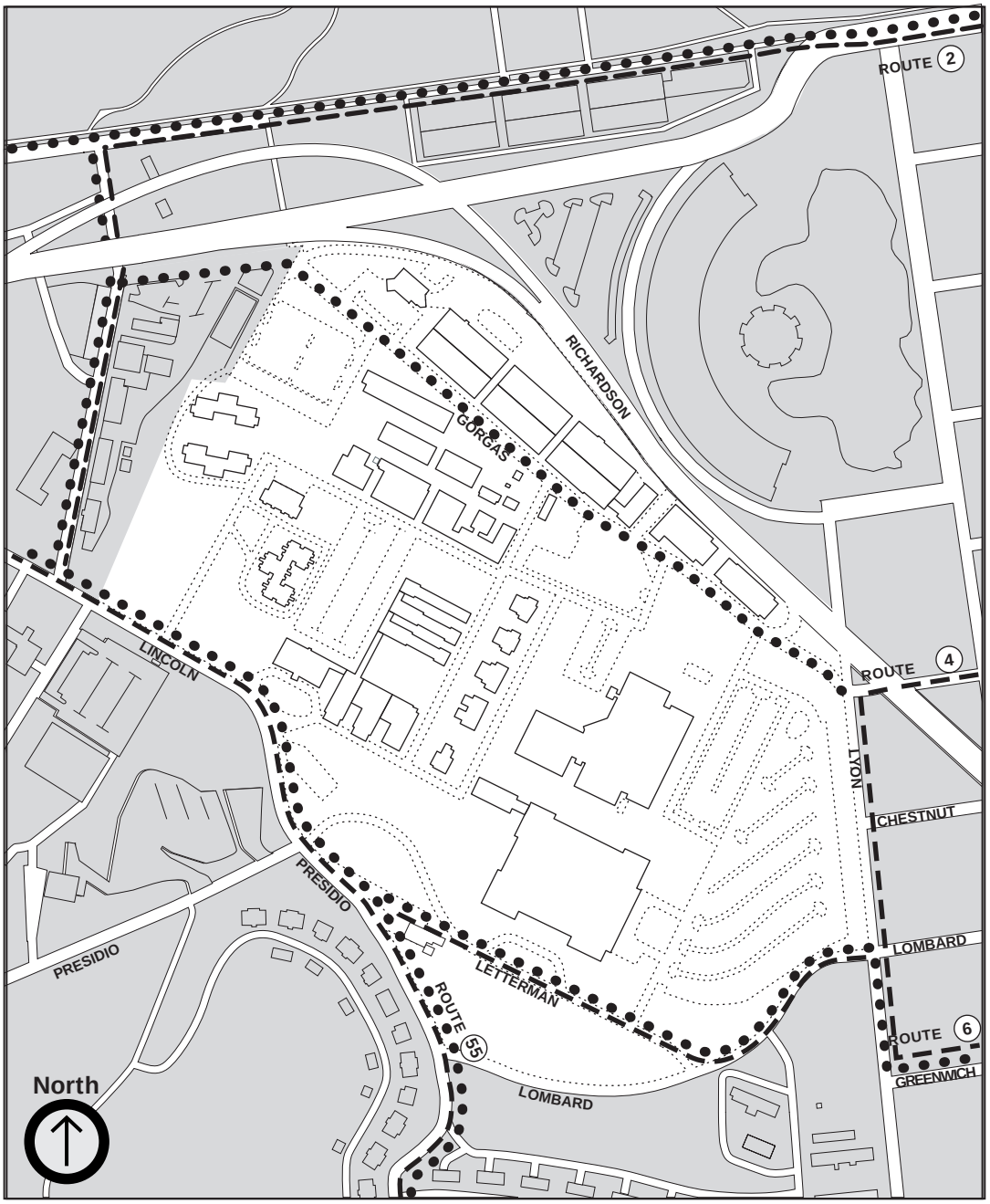


Figure B-22.
Current Bicycle Circulation

●●●●● Presidio Routes

▬ ▬ ▬ · City Routes

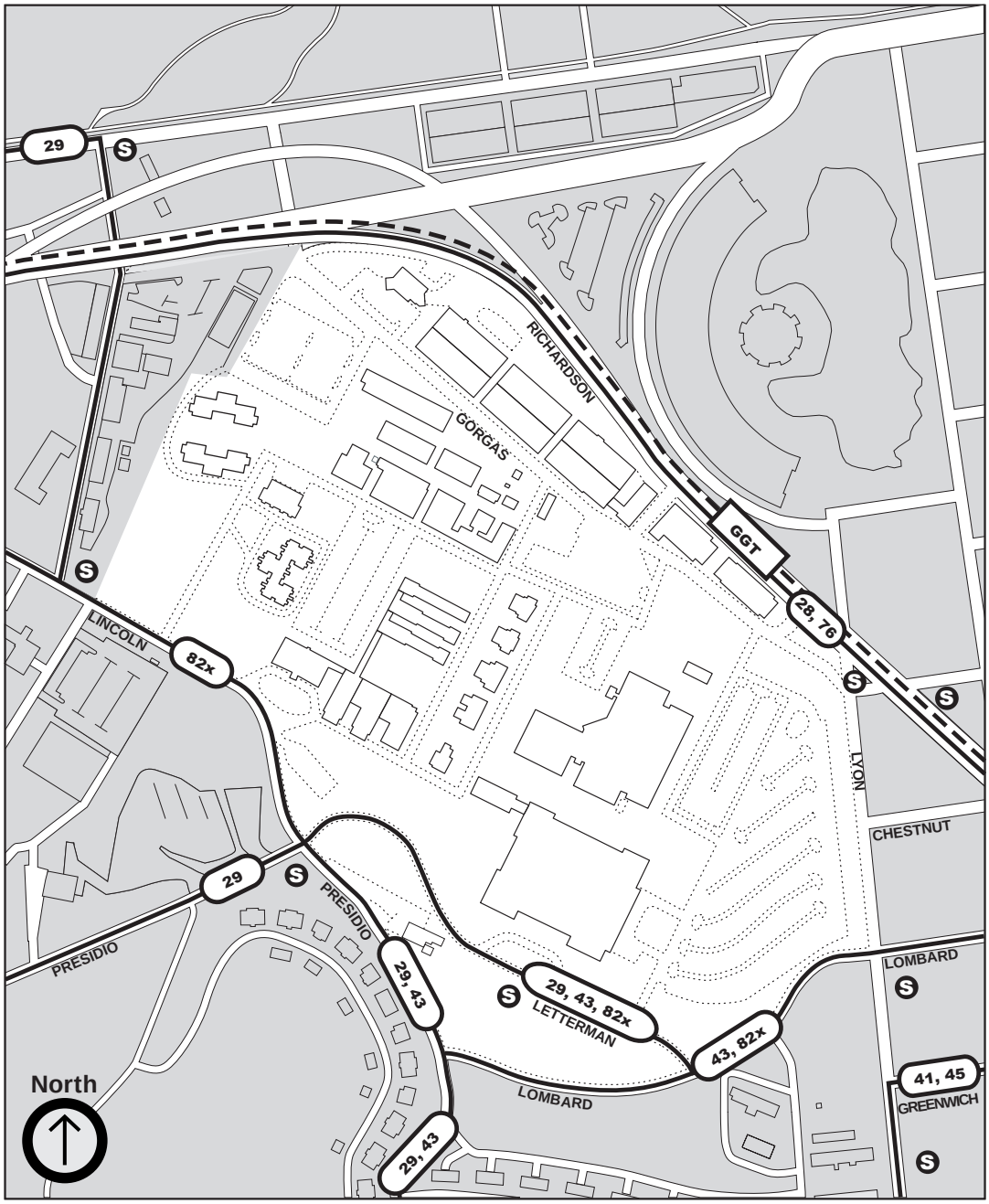


Figure B-23.
Current Transit

29 — MUNI Routes

GGT — Golden Gate Transit Routes

S — Bus Stops

Bio-Integral Resource Center
1996 *IPM Action Plans for Pests at the Presidio of San Francisco.*

Brack, Mark L., James P. Delgado, et al.
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1994b *Final General Management Plan Amendment and Environmental Impact Statement, Presidio of San Francisco, Golden Gate Recreation Area.*

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1996 *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes.*

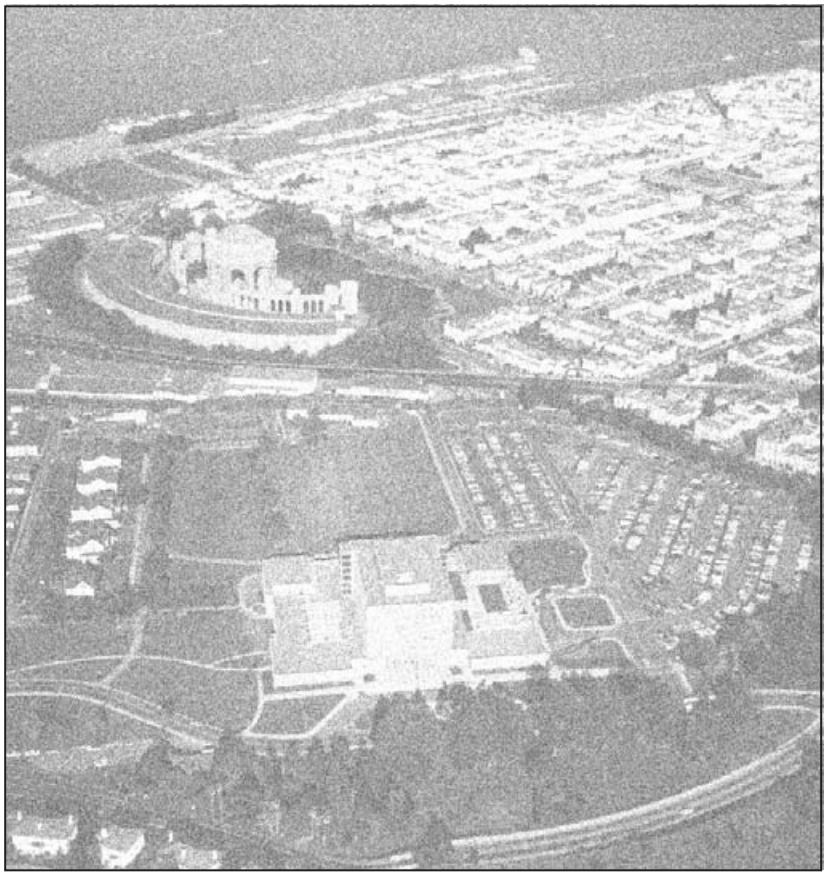
1997 *Natural Resources Inventory and Vegetation Options, Presidio of San Francisco.* Prepared by Jones and Stokes, Associates, Sacramento.

1999a *Presidio of San Francisco Vegetation Management Plan and Environmental Assessment.* In cooperation with the Presidio Trust. Preliminary Draft 1999.

Presidio Trust
1999 *Draft Green Building Guidelines for the Presidio of San Francisco.* San Francisco, CA.

Thompson, Erwin N.
1995 *Defender of the Gate: The Presidio of San Francisco, A History from 1846 to 1995.* (Historic Resource Study). Volumes I and II.

The Planning Guidelines are not intended to, nor do they create any right, substantive or procedural, enforceable at law or equity by a party against the Presidio Trust. They should not be construed to create any right to judicial review involving their compliance or noncompliance, and variations from these Planning Guidelines should not give rise to any independent cause of action.



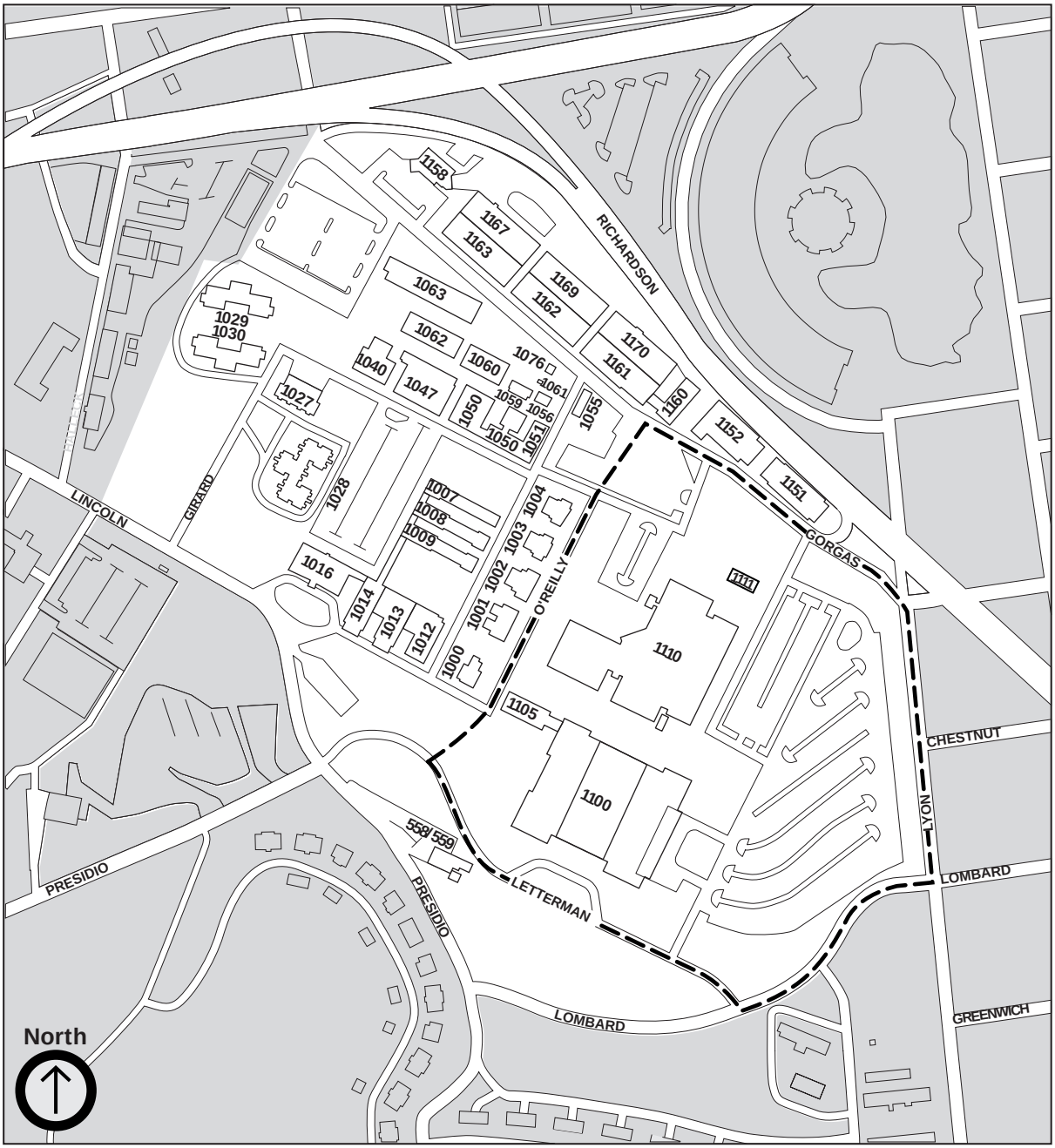


Figure C-1.
Letterman Complex Building Numbers

60-Acre Letterman Complex

23-Acre Site

Table C-1
Proposed Treatment of Buildings at the Letterman Complex

(refer to Figure C-1 for building locations)

BUILDING NUMBER	BUILDING NAME	HISTORIC	DATE BUILT	CURRENT USE	PROPOSED TREATMENT
558	Leasing office/information center	Yes	1920	Office	RH
559	Public Toilet	Yes	1940	Vacant	ST
1000	Office	Yes	1902	Office	RH
1001	Office	Yes	1902	Office	RH
1002	Office	Yes	1908	Office	RH
1003	Office	Yes	1908	Office	RH
1004	Office	Yes	1908	Office	RH
1007	Office	Yes	1901	Office	RH
1008	Office	Yes	1931	Office	RH
1009	Office	Yes	1930	Office	RH
1012	Office	Yes	1933	Office	RH
1013	Office	Yes	1933	Office	RH
1014	Office	Yes	1924	Office	RH
1016	Office	Yes	1899	Office	RH
1027	Office and Storage	No	1976	Office/Storage	RM
1028	Dormitory	No	1976	Dorms	RH
1029	Dormitory	No	1989	Vacant	RH
1030	Dormitory	No	1989	Vacant	RH
1040	Powerhouse	Yes	1900	Vacant	RH
1047	Laundry Building	Yes	1914	Vacant	RH
1050	Psychiatric Ward	Yes	1918	Vacant	RH
1051	Detention Ward	Yes	1909	Vacant	RH
1055**	Garage	Yes	1938	Vacant	RM
1056	Storage Building	Yes	1910	Office	RH
1059	Combustibles Storage Building	Yes	1915	Vacant	RH
1060	Medical Supply Warehouse	Yes	1916	Vacant	RH

Table C-1
Proposed Treatment of Buildings at the Letterman Complex

(refer to Figure C-1 for building locations)

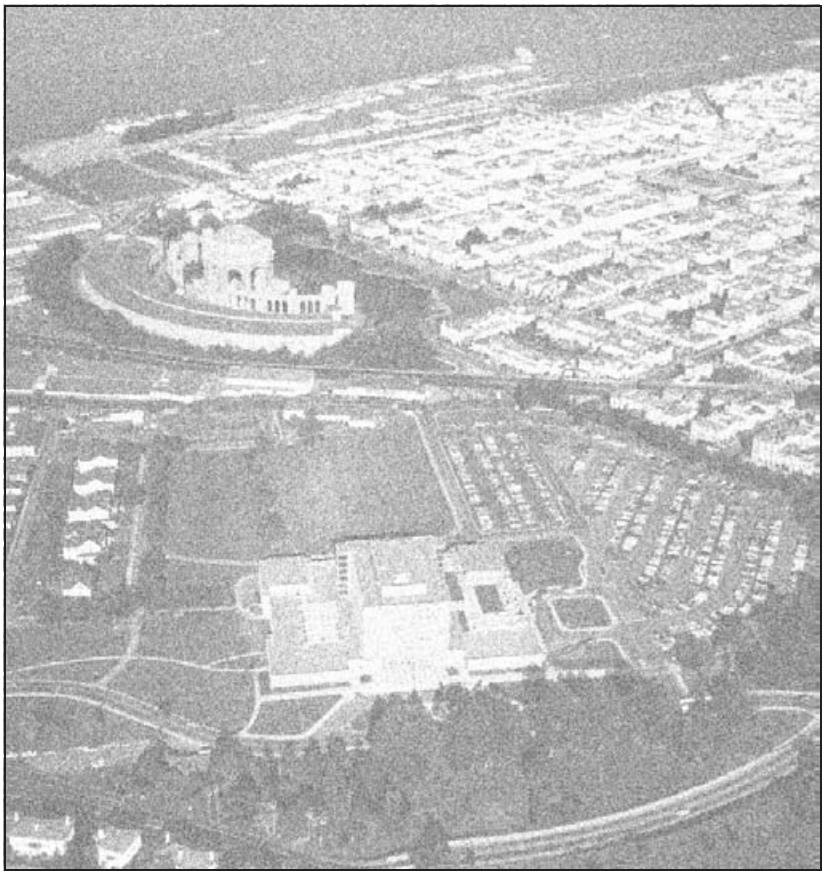
BUILDING NUMBER	BUILDING NAME	HISTORIC	DATE BUILT	CURRENT USE	PROPOSED TREATMENT
1061	Storage Shed	Yes	1938	Vacant	ST
1062	Medical Supply Warehouse	Yes	1922	Storage	RH
1063	Medical Supply Warehouse	Yes	1941	Vacant	RH
1076	Garage	Yes	1938	Storage/lab	ST
1151	Indoor Swimming Pool	Yes	1945	Recreation	RH
1152	Gymnasium	Yes	1945	Recreation	RH
1158	Retail Outlet	No	1988	Vacant	RM
1160	Warehouse	Yes	1940	Vacant	RH
1161	Warehouse	Yes	1919	Vacant	RH
1162	Warehouse	Yes	1919	Storage	RH
1163	Warehouse with offices/training	Yes	1919	Storage/office/training	RH
1167	Warehouse	Yes	1919	Vacant	RH
1169	Warehouse	Yes	1919	Vacant	RH
1170	Warehouse	Yes	1919	Vacant	RH

BUILDING NUMBER	BUILDING NAME	HISTORIC	DATE BUILT	PROPOSED TREATMENT		
				Alt. 1	**Alt. 2-5**	**Alt. 6**
1100	LAMC*	No	1969	RM	RM	RM
1105	Letterman Theatre*	No	1972	RH	RM	RM
1110	LAIR*	No	1974	RH	RM	RH
1111	Inflammable Material Storage*	No	1982	RH	RM	RH

Notes:
* Part of 23-acre site
**Building 1055 was extensively damaged by fire in 1999 and is slated for demolition.

Legend:
RH=Rehabilitate and Reuse
RM=Demolish
ST=Stabilize and Preserve in Existing Form

D. METHODOLOGIES USED IN HOUSING & TRAFFIC IMPACT ANALYSES



D. METHODOLOGIES USED IN THE HOUSING AND TRAFFIC IMPACT ANALYSIS

The methodologies used in the housing and traffic impact analyses are discussed below. The traffic impact analysis is more fully described in the Letterman Complex Transportation Technical Report (Wilbur Smith Associates 1999).

Housing

The methods used to estimate the net new regional demand for housing resulting from each alternative, and to distribute that demand to the Presidio and to the surrounding Bay Area, were based on the methodology applied in the GMPA *Socioeconomic Impact Analysis Report* (Jones & Jones, 1994) with certain updates to reflect the best available information. For the purposes of this analysis, the year 2013 was used as the year in which stabilized occupancy of the Presidio would occur. This is consistent with the buildout assumptions used by the Presidio Trust (1998d).

The impact of each alternative is assessed to determine whether would be a significant increase in demand for housing in the city of San Francisco and the surrounding Bay Area. Thus, the housing impact analysis is set in the regional — rather than the Presidio-specific — context.

The following is a summary of the methodology used to predict impacts (updates noted).

TOTAL EMPLOYMENT

As widely acknowledged in the housing economics literature, housing demand is directly related to job growth. Hence, the housing impacts analysis begins with an estimation of the total number of jobs generated by each alternative using assumptions from the GMPA EIS for Alternative 1 and employment estimates supplied by project proponents for Alternatives 2 through 6.

GENERATION OF HOUSING DEMAND

Applying the methodology from the GMPA EIS, net new regional housing demand is calculated in two steps. First, the proportion of new employment assumed to result in in-migration to the Bay Area is calculated by multiplying total new employment by a 25 percent factor used in the GMPA EIS. The second step is to convert employment to households, by taking the product of the first step divided by 1.3, the number of employed persons per household as assumed in the GMPA EIS. This step yields new household demand from outside the San Francisco Bay Area.

Although some of the proposals include identified tenants that are relocating operations from elsewhere in the San Francisco Bay Area, the regional economic analysis takes into account that expansion of the economy through creation of new employment will draw additional households to the region. Thus, although the direct occupants of the space may all result from relocation of existing workers within the region, the businesses that move into the buildings vacated by the direct occupants are likely to draw employees from outside the region.

ALLOCATION OF PRESIDIO HOUSING SUPPLY TO THE LETTERMAN COMPLEX PROJECT

The supply of housing assumed to be available to satisfy net new demand for housing generated by the project is calculated as the sum of existing supply allocated to the Letterman Complex and any new housing proposed in an alternative. The number of existing Presidio housing units available to an alternative was calculated by:

(i) dividing the employment estimate provided in the GMPA EIS (the best available source for Presidio employment estimates) derived for the LAMC/LAIR (970 employees) by total Presidio-wide employment estimate provided in the GMPA EIS (4,782 employees); and (ii) multiplying the resultant factor of 20.3 percent to the 1,304 existing Presidio housing units (1,116 family housing units and 188 dormitories), or 265 units allocated to the Letterman Complex and assumed to be available to satisfy net new housing demand generated an alternative. To the allocated base of 265 units is added any new housing proposed in an alternative, yielding the total Presidio units allocated to the Letterman Complex plus new housing.

NET NEW REGIONAL HOUSING DEMAND

The net new regional housing demand generated by an alternative is the remainder after subtracting Presidio housing units allocated to the Letterman Complex plus new housing from the total of new household demand from outside the SF Bay Area. A positive value indicates that an alternative generates demand for housing in excess of supply at the Presidio; a negative value indicates that more housing is provided by an alternative than would be demanded by employment generated by an alternative.

ESTIMATION OF SUB-REGIONAL IMPACTS OF NET NEW HOUSING DEMAND

An analysis of the sub-regional impacts of net new regional housing demand from an alternative is provided. Sub-regional impacts are estimated by distributing new net housing demand among four sub-areas of the Bay Area: San Francisco, North Bay, Peninsula, and East Bay. The percent allocation factors are based on responses to a recent Presidio employee transportation survey that reports employee residence data (Presidio Trust 1998e). In addition, allocated demand is expressed as a percentage of reported vacancies for each sub-region.

Traffic and Transportation Systems

TRIP GENERATION

The trip generation rates for each alternative were developed to provide rates that were representative of the land uses described under the alternative. Trip generation was calculated using daily trip generation rates based primarily on the *San Francisco Guidelines for Environmental Review* (City and County of San Francisco 1991). The *Citywide Travel Behavior Survey* (City and County of San Francisco 1993) trip generation data were supplemented with information from the Institute of Transportation Engineers (1991, 1997) for land uses for which the survey did not provide sufficient data. These rates were refined based on review of information from other sources to more closely reflect the trip-generation associated with the particular land uses.

The expected balance of employment land uses and residential land uses within the Presidio in the year 2010 creates the opportunity for individuals who live in the Presidio to also work within the Presidio, indicating that some of the trips to and from the Letterman Complex would actually originate or terminate in other parts of the Presidio. So that these internal trips could be evaluated differently than trips to and from the city of San Francisco or other parts of the Bay Area, the total number of person-trips generated by the proposed land uses in each alternative were separated into external trips and internal trips.

Approximately 15 percent of the trips generated by offices and research facilities were assumed to begin and end within the Presidio, while different internal/external splits were assumed for other land uses. Because

internal trips are more likely to be made by transit, walking, or bicycling than external trips, the separation of the two types of trips allowed for the application of different mode splits.

The daily and p.m. peak-hour trip generation rates used for the analysis are summarized in Table D-1, below.

Table D-1
Trip Generation Rates for Letterman Complex

Land Use	Alternatives	Person-Trip Rate Daily	Person-Trip Rate p.m. Pk Hr	Unit
Office[a]	3, 4	18.10	1.81	1,000 square feet
External		85%	85%	
Internal		15%	15%	
Retail[b]	1	150.00	6.00	1,000 square feet
External		25%	25%	
Internal		75%	75%	
University/R&D[c]	2, 4, 5	11.42	1.07	1,000 square feet
External		85%	85%	
Internal		15%	15%	
Housing/Ext. Stay[d]	2, 4	10.00	1.73	Dwelling unit
External		84%	75%	
Internal		17%	25%	
Inn/Retreat[e]	2	8.40	0.84	1,000 square feet
External		75%	75%	
Internal		25%	25%	
Research[f]	1, 6	12.90	1.38	1,000 square feet
External		85%	85%	
Internal		15%	15%	
Congregate Care[g]	3	3.01	0.24	Dwelling unit
External		84%	75%	
Internal		17%	25%	
Storage[h]	1	2.00	0.20	1,000 square feet
External		100%	100%	
Internal		0%	0%	
Hotel/Conf. Ctr.[i]	3	5.41	0.54	Room
External		75%	75%	
Internal		25%	25%	

[a] Daily Trip Rate: *Guidelines for Environmental Review* (CCSF 1991); p.m. Peak-Hour Trip Rate: 10 percent of daily rate.
[b] Daily and p.m. Peak-Hour Trip Rates: *Guidelines for Environmental Review* (CCSF 1991), Appendix 1, General Convenience Retail.
[c] Daily and p.m. Peak-Hour Trip Rates: Institute of Transportation Engineers Trip Generation, 5th edition (composite of University (Land Use 550) and Research and Development (Land Use 760) ratio to Office (Land Use 710) multiplied by trip generation rates for office space.
[d] Daily and p.m. Peak-Hour Trip Rates: *Guidelines for Environmental Review* (CCSF 1991), Appendix 1, Single-Family 2+ Bedroom Multi-Unit Residential (assumes that half of work trips are internal).
[e] Daily and p.m. Peak-Hour Trip Rates: *Presidio Validation Study* (NPS 1988) (70 percent of both daily and p.m. peak hour rates).
[f] Daily and p.m. Peak-Hour Trip Rates: Institute of Transportation Engineers Trip Generation, 5th edition (Research and Development (Land Use 760) ratio to Office (Land Use 710) multiplied by trip generation rates for office space.
[g] *Institute of Transportation Engineers Trip Generation*, 6th edition (Land Use 252, Congregate Care Facility).
[h] Daily and p.m. Peak-Hour Trip Rates: *Presidio Validation Study* (NPS 1988) (70 percent of both daily and p.m. peak hour rates).
[i] Fort Baker EIS, Fort Scott facilities (assumes 2 daily visitor trips per room, 1.98 daily trips per overnight guest, and 1.43 daily employee trips per room).

MODE SPLIT

Person-trips generated under each alternative were assigned to travel modes in order to determine the number of auto, transit and walk/bicycle trips. Mode split information for internal/external and external/internal trips was obtained from the GMPA EIS. The expected mode split for these trips to and from the Letterman Complex is 70 percent automobile, 15 percent transit and 15 percent pedestrian and bicycle usage. Trips made between the Letterman Complex and other parts of the Presidio would be more likely made with non-automobile modes than trips originating or ending outside the Presidio. Therefore, the mode split for internal trips was estimated to be 50 percent automobiles, 20 percent transit and 30 percent pedestrians or bicycles.

Auto person-trips refer to person-trips either as a driver or passenger in a private vehicle. To determine the number of vehicle-trips generated by the number of auto person-trips, an average vehicle occupancy of 1.4 persons per vehicle was used, which is consistent with data from the San Francisco Citywide Travel Behavior Survey.

The mode split assumes implementation of TDM measures that would be phased in through the year 2010. The TDM program would include the following measures as a minimum:

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

Tables D-2 and D-3 present the person-trip generation by mode and vehicle trips for each alternative for weekday daily and p.m. peak hour conditions, respectively. These trips include employee journey-to-work and other employee non-work trips, as well as visitor trips. Trips internal to the Presidio are presented separately in Tables D-4 and D-5.

Table D-2
Estimated External Trip Generation for Letterman Complex
Weekday Daily Conditions

Alternative	Person-Trips				Vehicle Trips
	Auto	Transit	Walk/Bicycle	Total	
Alternative 1	6,380	1,370	1,370	9,120	4,560
Alternative 2	5,990	1,280	1,280	8,550	4,280
Alternative 3	6,130	1,310	1,310	8,750	4,460
Alternative 4	7,200	1,540	1,540	10,280	5,140
Alternative 5	6,120	1,310	1,310	8,740	4,360
Alternative 6	2,730	590	590	3,910	1,960

Source: Wilbur Smith Associates 1999
Notes:
Table shows internal/external and external/internal vehicle and person-trips by various modes. Totals do not include internal traffic. Values include both inbound and outbound trips. Vehicle trips are automobile-person trips divided by an average vehicle occupancy of 1.4 persons per vehicle.

Table D-3
Estimated External Trip Generation for Letterman Complex
Weekday p.m. Peak-Hour Conditions

Alternative	Person-Trips				Vehicle Trips
	Auto	Transit	Walk/Bicycle	Total	
Alternative 1	670	140	140	950	490
Alternative 2	710	150	150	1,010	520
Alternative 3	600	130	130	860	430
Alternative 4	840	180	180	1,200	600
Alternative 5	570	120	120	810	400
Alternative 6	290	60	60	410	220

Source: Wilbur Smith Associates 1999
Notes:
Table shows internal/external and external/internal vehicle and person-trips by various modes. Totals do not include internal traffic. Values include both inbound and outbound trips. Vehicle trips are automobile-person trips divided by an average vehicle occupancy of 1.4 persons per vehicle.

Table D-4
Estimated Internal Trip Generation for Letterman Complex
Weekday Daily Conditions

Alternative	Person-Trips				Vehicle Trips
	Auto	Transit	Walk/Bicycle	Total	
Alternative 1	1,220	490	730	2,440	870
Alternative 2	880	350	530	1,760	630
Alternative 3	890	360	530	1,780	640
Alternative 4	940	380	570	1,890	670
Alternative 5	770	310	460	1,540	550
Alternative 6	340	140	210	690	250

Source: Wilbur Smith Associates 1999
Notes:
Table shows internal/internal vehicle and person-trips by various modes. Values include both inbound and outbound trips. Vehicle trips are automobile-person trips divided by an average vehicle occupancy of 1.4 persons per vehicle.

Table D-5
Estimated Internal Trip Generation for Letterman Complex
Weekday p.m. Peak-Hour Conditions

Alternative	Person-Trips				Vehicle Trips
	Auto	Transit	Walk/Bicycle	Total	
Alternative 1	100	40	60	200	70
Alternative 2	140	60	80	280	100
Alternative 3	90	40	50	180	60
Alternative 4	150	60	90	300	110
Alternative 5	70	30	40	140	50
Alternative 6	40	20	20	70	30

Source: Wilbur Smith Associates 1999
Notes:
Table shows internal/internal vehicle and person-trips by various modes. Values include both inbound and outbound trips. Vehicle trips are automobile-person trips divided by an average vehicle occupancy of 1.4 persons per vehicle.

TRIP DISTRIBUTION

The geographic distribution of employee and visitor trips to and from the Letterman Complex was based on a recent survey of existing employees at the Presidio (Presidio Trust 1998e)[1]. Table D-6 summarizes the trip distribution patterns for person-trips (by auto, transit and walk/bicycle). Overall, more than half of the trips (approximately 55 percent) are anticipated to travel within San Francisco (including trips internal to the Presidio). The trips to and from San Francisco are further separated into four quadrants of the city, or Superdistricts as described in the Citywide Travel Behavior Survey. Out of the 45 percent that would travel to and from the areas outside of San Francisco, most would be to and from the East Bay and North Bay.

[1] Approximately 350 responses (or one-third of estimated employees) were received and tabulated.

Table D-6
Geographic Distribution of Employee/Visitor Trips

Origin/Destination	Percent
San Francisco	55%
Superdistrict 1 (northeast quadrant)	8%
Superdistrict 2 (northwest quadrant)	20%
Superdistrict 3 (southeast quadrant)	18%
Superdistrict 4 (southwest quadrant)	9%
East Bay	24%
North Bay	14%
South Bay	7%
Total	100%

Source: Presidio Trust 1998e

Based on the trip distribution shown in Table D-6, the vehicle-trips generated by the alternatives were assigned to the local street network. Under Alternatives 1 through 5, a reconfigured intersection would be provided at the Gorgas Avenue Gate which would allow left turns into the Presidio from Richardson Avenue, and left turns out of the Presidio to Richardson Avenue. Table D-7 presents the traffic generated by each alternative at each of the Presidio entrance gates.

Table D-7
Summary of Letterman Complex Traffic Volumes at Presidio Entrance Gates
Weekday p.m. Peak-Hour Conditions

Entrance	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6
Mason	50	60	40	60	40	30
Gorgas	310	340	280	390	260	90
Lombard	50	50	40	60	40	40
Presidio	80	70	70	90	60	60
Arguello	0	0	0	0	0	0
15th Avenue	0	0	0	0	0	0
Lincoln	0	0	0	0	0	0
G. G. Plaza	0	0	0	0	0	0
Total	490	520	430	600	400	220

Source: Wilbur Smith Associates 1999
Note:
Includes inbound and outbound trips.

It is expected that the greatest number of project-generated trips would use the Gorgas Avenue Gate, with two-thirds of both the traffic using the Gorgas Avenue Gate under Alternatives 1, 2, 3, 4, and 5, and half of the traffic under Alternative 6. The remaining trips would be generally evenly distributed over the Mason Street, Lombard Street and Presidio Avenue gates. As the Lombard Street, Mason Street, Gorgas Avenue and Presidio Avenue gates provide the most direct routes to and from the Letterman Complex, it was assumed that no trips associated with each alternative would use the Arguello, 15th Avenue or Lincoln Boulevard gates.

Table D-8 presents a summary of the projected total year 2010 traffic volumes at the Presidio entrance gates for weekday p.m. peak hour conditions.

Table D-8
Summary of Projected Total Year 2010 Traffic Volumes at Entrance Gates
Weekday p.m. Peak-Hour Conditions

Entrance	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Alt. 6
Mason	960	970	960	980	960	940
Gorgas	790	820	770	880	750	580
Lombard	1,570	1,570	1,570	1,580	1,560	1,560
Presidio	940	940	930	950	930	920
Arguello	1,000	1,000	1,000	1,000	1,000	1,000
15th Avenue	300	300	300	300	300	300
Lincoln	1,360	1,360	1,360	1,360	1,360	1,360
G. G. Plaza	1,190	1,190	1,190	1,190	1,190	1,190
Total	8,110	8,150	8,080	8,240	8,050	7,850

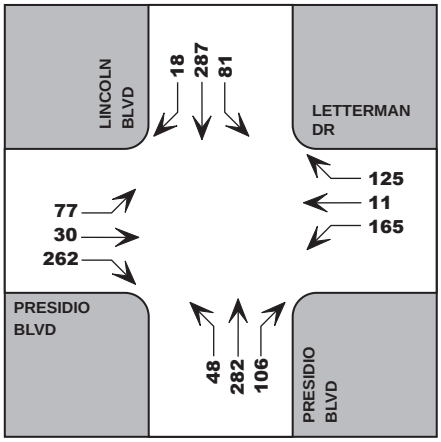
Source: Wilbur Smith Associates 1999
Note:
Includes inbound and outbound trips

Figures D-1 through D-6 present the weekday p.m. peak-hour turning movement volumes at the five study intersections for each of the alternatives.

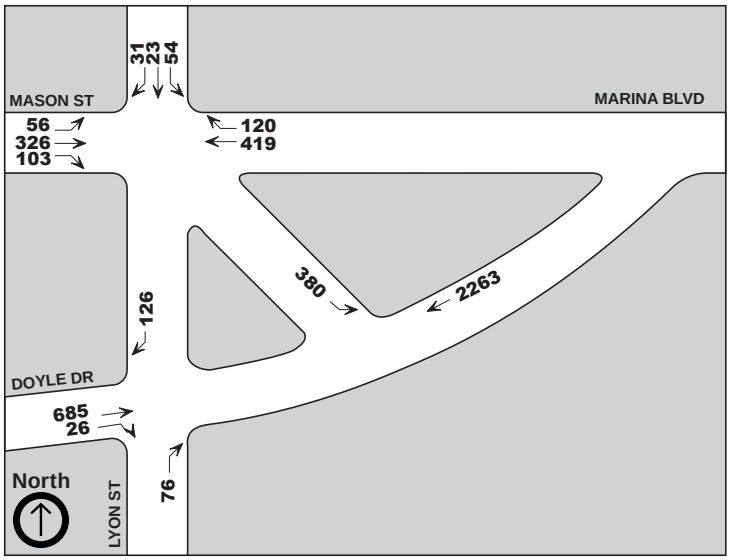
TRAFFIC LEVELS IN AND ADJACENT TO THE PRESIDIO

Year 2010 traffic volumes entering and exiting Presidio gates were obtained from the Presidio Transportation Planning and Analysis Technical Report (NPS 1994b). The year 2010 weekday p.m. peak-hour gate volumes described for the GMPA EIS (Alternative A) were used to determine turning movements at study intersections under the same scenario. The gate and intersection turning movement volumes were then modified to reflect the conversion of the nearby O'Reilly Avenue housing to office uses (yielding an increase in projected traffic), and the vehicle trips assumed in the GMPA EIS for the 23-acre site were subtracted from the adjusted year 2010 gate and intersection turning movement traffic volumes to yield traffic conditions representative of a base year 2010 scenario. The vehicle trips generated by each of the six alternatives were then added to the base year 2010 p.m. peak-hour Presidio gate volumes and intersection turning movement volumes.

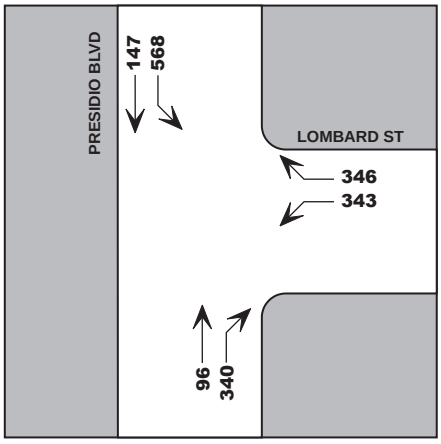
Tables D-9 and D-10 present a summary of the year 2010 project p.m. peak-hour and daily traffic volumes at the Presidio gates estimated for each alternative. Tables D-9 and D-10 present the inbound and outbound distribution of vehicle trips generated by each alternative at the Presidio gates for the p.m. peak hour and on a daily basis, respectively.



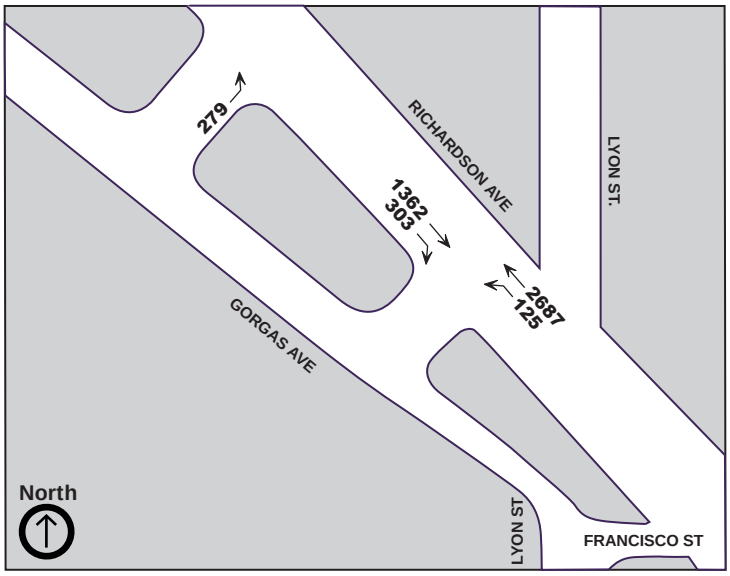
Presidio/Lincoln/Letterman Intersection



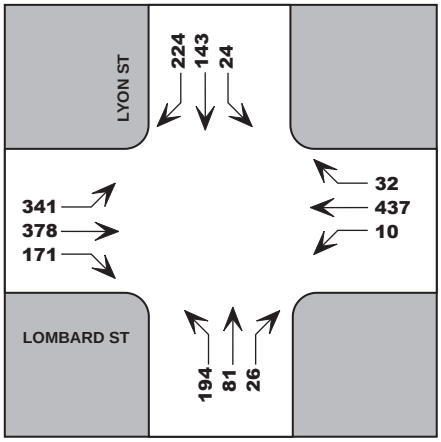
Marina Boulevard/Doyle Drive Intersection



Presidio/Lombard Intersection

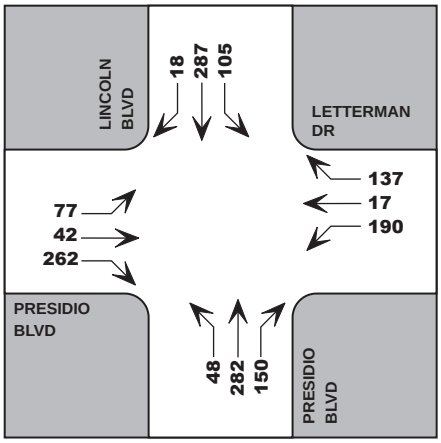


Lyon/Richardson/Gorgas/Francisco Intersection

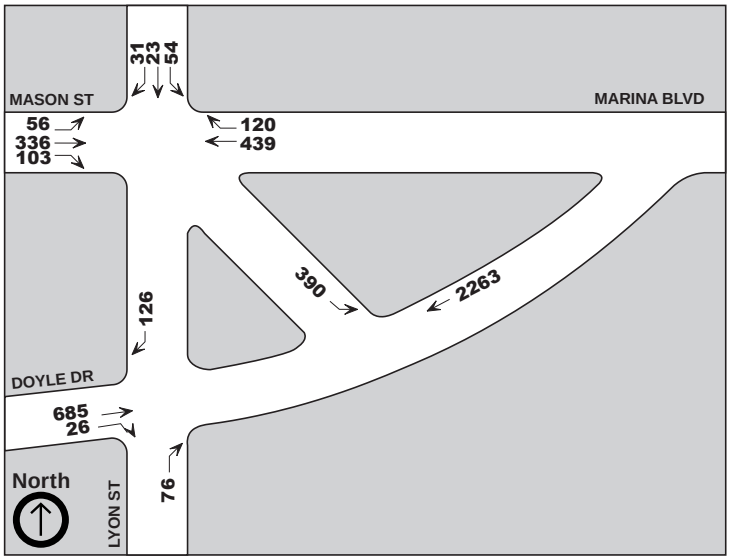


Lombard/Lyon Intersection

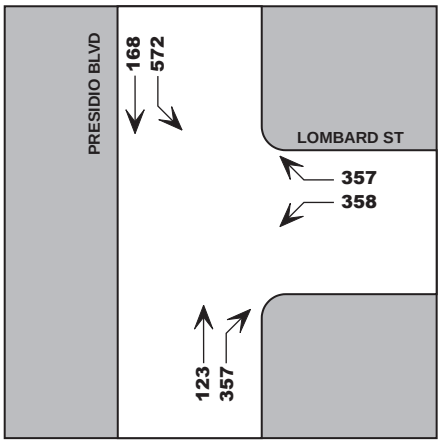
Figure D-1.
Year 2010 PM Peak Hour Turning Movement Volumes - Alternative 1



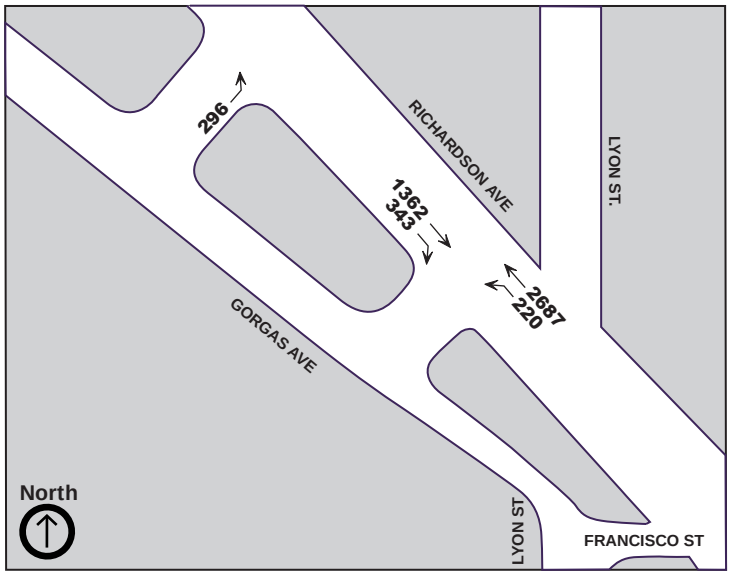
Presidio/Lincoln/Letterman Intersection



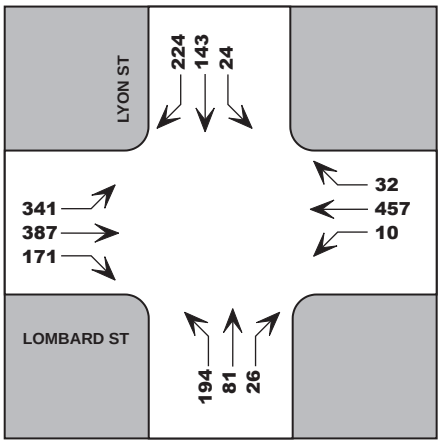
Marina Boulevard/Doyle Drive Intersection



Presidio/Lombard Intersection

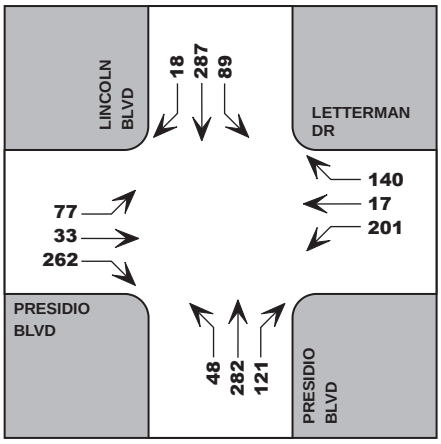


Lyon/Richardson/Gorgas/Francisco Intersection

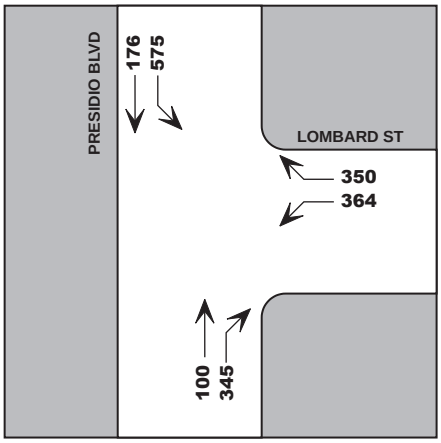


Lombard/Lyon Intersection

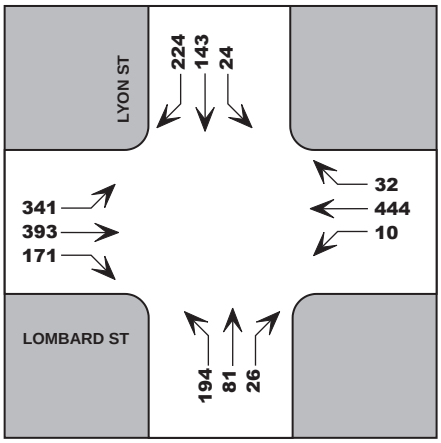
Figure D-2.
Year 2010 PM Peak Hour Turning Movement Volumes - Alternative 2



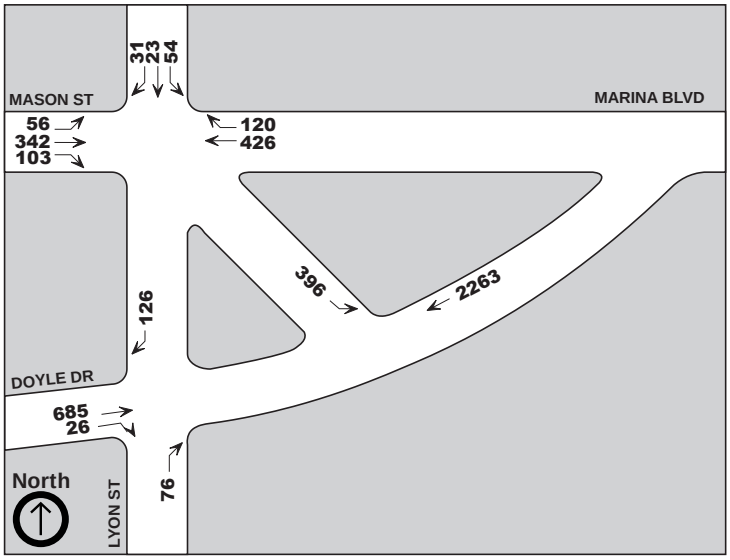
Presidio/Lincoln/Letterman Intersection



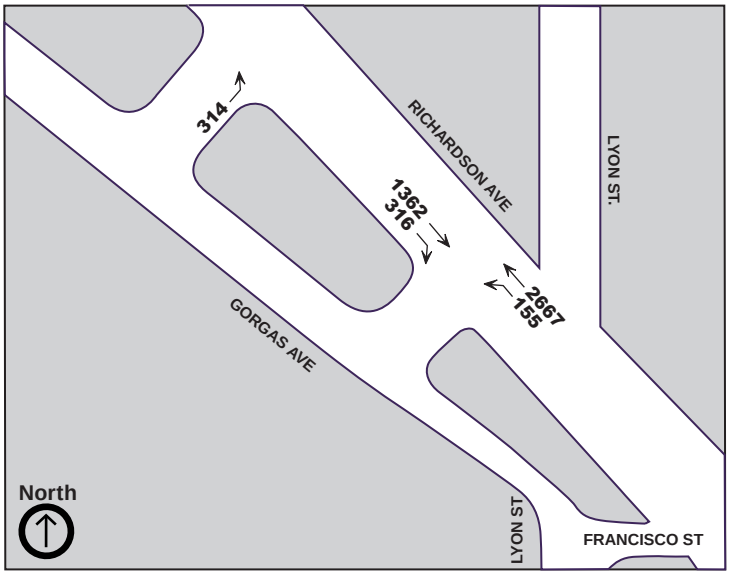
Presidio/Lombard Intersection



Lombard/Lyon Intersection

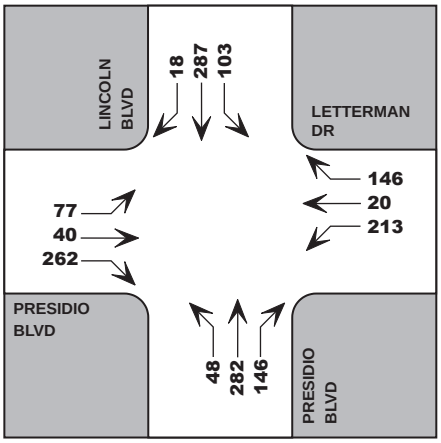


Marina Boulevard/Doyle Drive Intersection

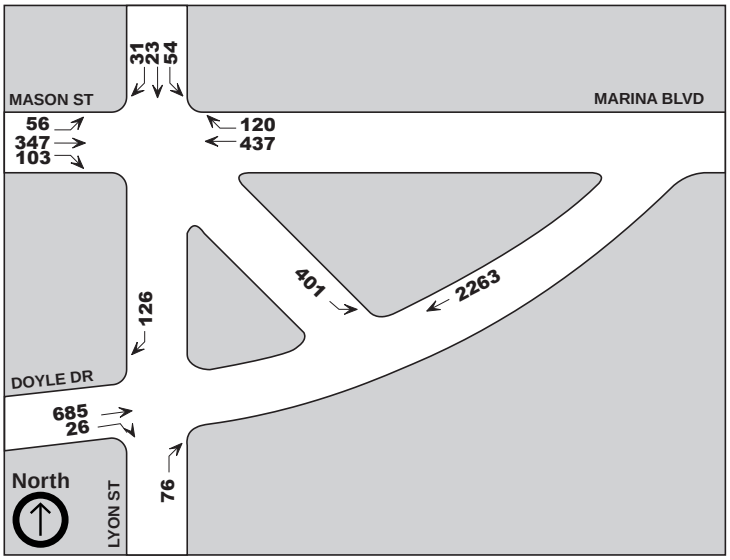


Lyon/Richardson/Gorgas/Francisco Intersection

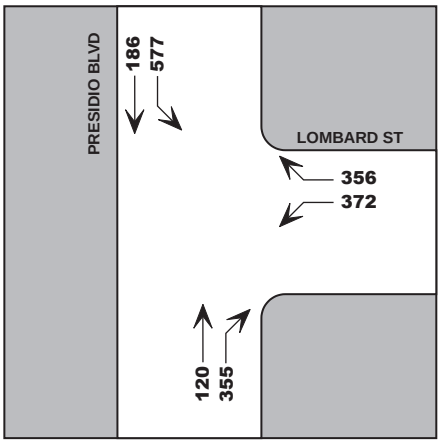
Figure D-3.
Year 2010 PM Peak Hour Turning Movement Volumes - Alternative 3



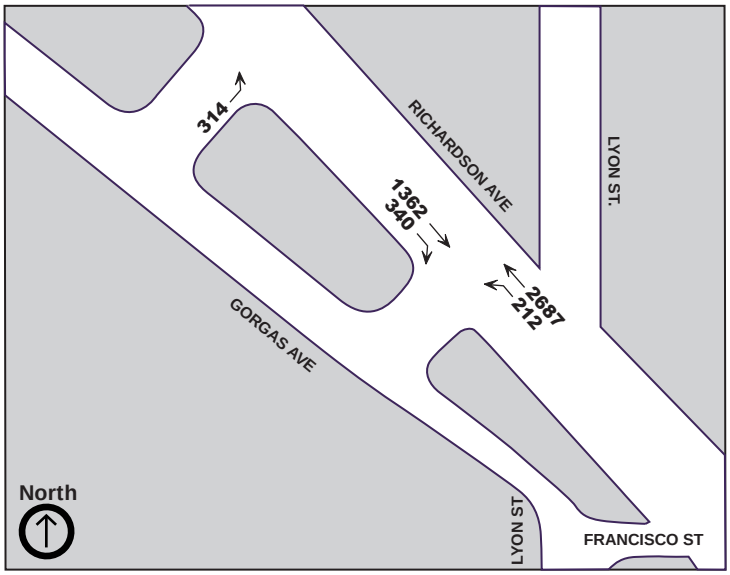
Presidio/Lincoln/Letterman Intersection



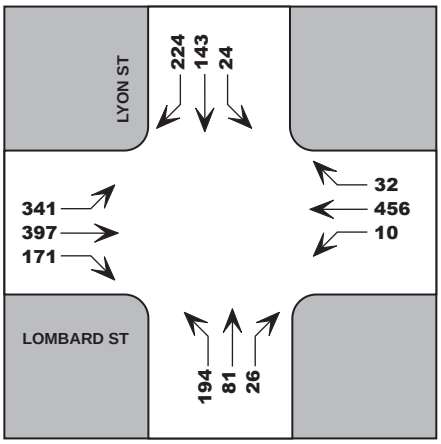
Marina Boulevard/Doyle Drive Intersection



Presidio/Lombard Intersection

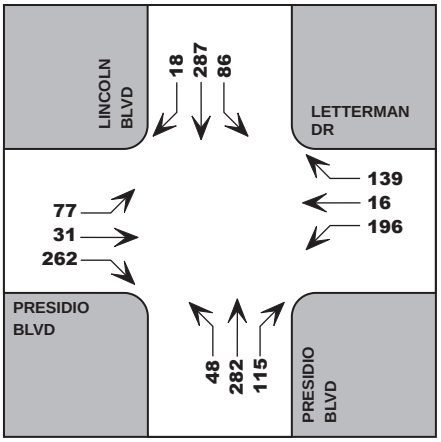


Lyon/Richardson/Gorgas/Francisco Intersection

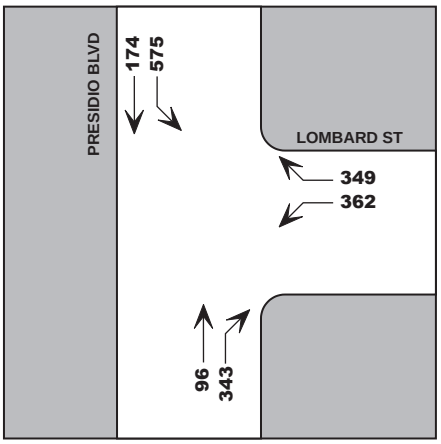


Lombard/Lyon Intersection

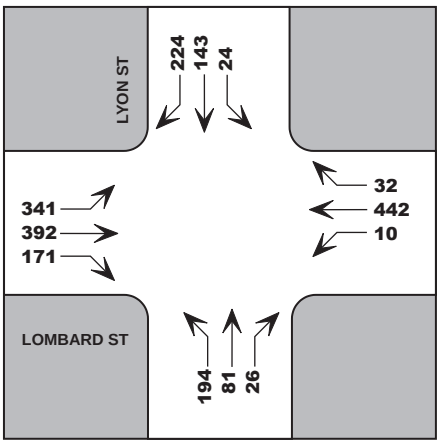
Figure D-4.
Year 2010 PM Peak Hour Turning Movement Volumes - Alternative 4



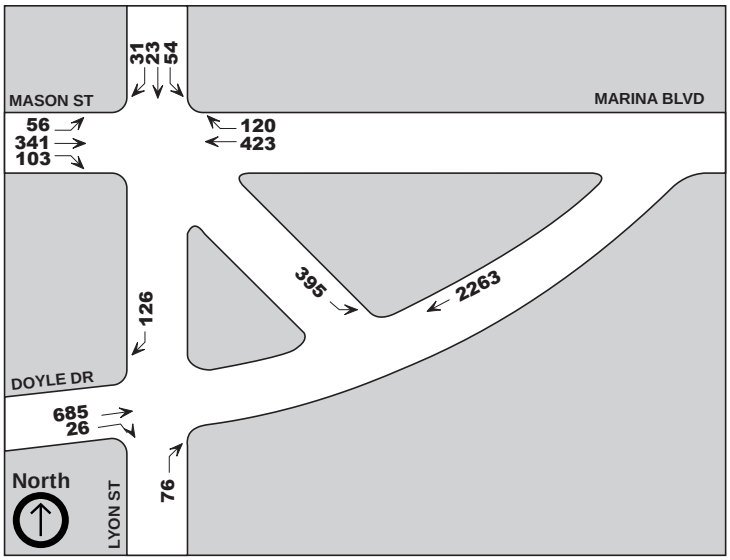
Presidio/Lincoln/Letterman Intersection



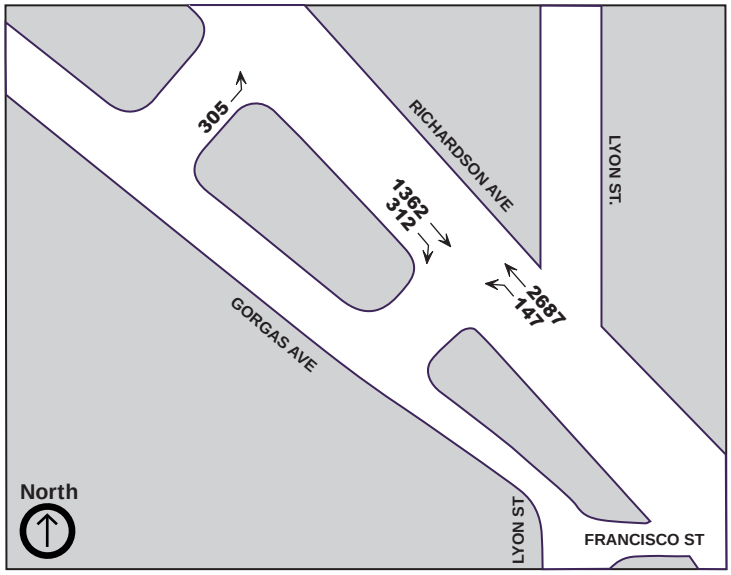
Presidio/Lombard Intersection



Lombard/Lyon Intersection

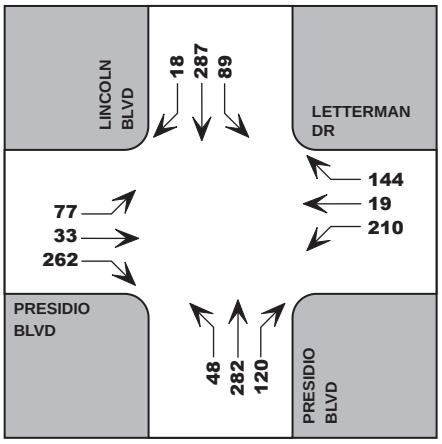


Marina Boulevard/Doyle Drive Intersection

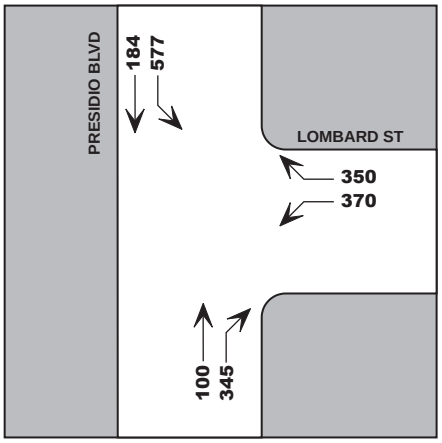


Lyon/Richardson/Gorgas/Francisco Intersection

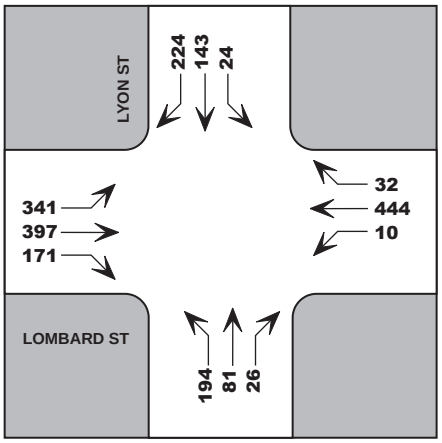
Figure D-5.
Year 2010 PM Peak Hour Turning Movement Volumes - Alternative 5



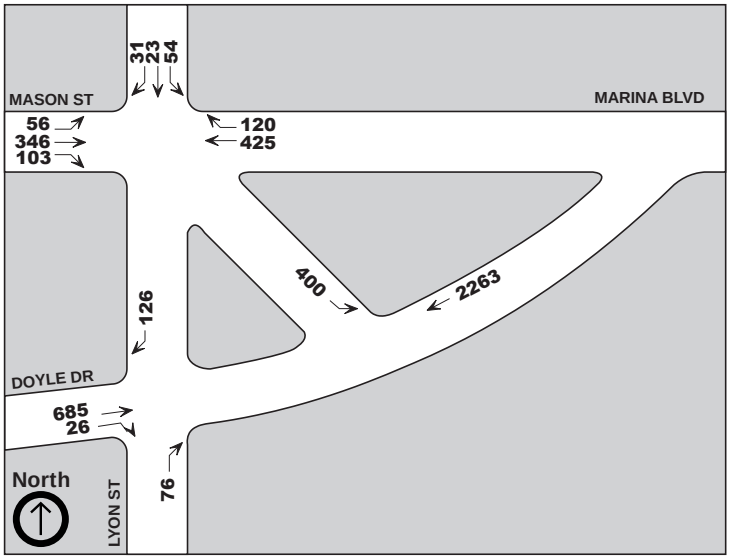
Presidio/Lincoln/Letterman Intersection



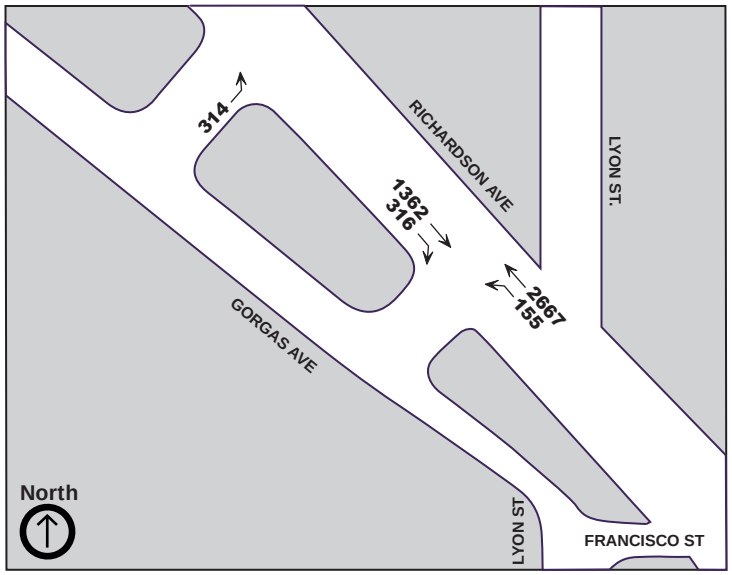
Presidio/Lombard Intersection



Lombard/Lyon Intersection



Marina Boulevard/Doyle Drive Intersection



Lyon/Richardson/Gorgas/Francisco Intersection

Figure D-6.
Year 2010 PM Peak Hour Turning Movement Volumes - Alternative 6

Table D-9
Gate Assignment of p.m. Peak-Hour Letterman Traffic to Roadway Network

	Gate Distribution Alts. 1-5		Alt. 1		Alt. 2		Alt. 3		Alt. 4		Alt. 5		Gate Distribution Alt. 6		Alt. 6	
Gate	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out
Mason Street	10%	10%	10	40	30	30	10	30	20	40	10	30	10%	10%	10	20
Gorgas Avenue	67%	64%	80	230	170	170	80	200	160	240	60	200	30%	51%	10	80
Lombard Street	10%	10%	10	40	20	30	10	30	20	30	10	30	46%	10%	20	20
Presidio Avenue	13%	17%	20	60	30	40	20	50	30	60	10	50	13%	29%	10	50
Total	100%	100%	120	370	250	270	120	310	230	370	90	310	100%	100%	50	170
			490		520		430		600		400				220	

Source: Wilbur Smith Associates 1999

Table D-10
Gate Assignment of Daily Letterman Traffic to Existing Network

	Gate Distribution Alts. 1-5		Alt. 1		Alt. 2		Alt. 3		Alt. 4		Alt. 5		Gate Distribution Alt. 6		Alt. 6	
Gate	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out
Mason Street	10%	10%	230	230	220	220	230	230	260	260	220	220	10%	10%	100	100
Gorgas Avenue	67%	64%	1,530	1,450	1,430	1,370	1,490	1,420	1,720	1,640	1,460	1,390	30%	51%	300	500
Lombard Street	10%	10%	220	220	200	200	210	210	240	240	210	210	46%	10%	450	90
Presidio Avenue	13%	17%	300	380	290	350	300	370	350	430	290	360	13%	29%	130	290
	100%	100%	2,280	2,280	2,140	2,140	2,230	2,230	2,570	2,570	2,180	2,180	100%	100%	980	980
			4,560		4,280		4,460		5,140		4,360				1,960	

Source: Wilbur Smith Associates 1999

PARKING DEMAND

Parking demand associated with each alternative consists of both long-term demand (i.e., employee and resident parking) and short-term demand (i.e., visitor parking). Long-term parking for non-housing land uses was estimated by determining the number of employees for each land use and applying the average mode split and vehicle occupancy from the trip generation estimation for both external and internal trips.

The parking demand for the hotel/conference center and inn/retreat was estimated as long-term only, with a rate of 1 space per room, which accounts for both employees and guests. A long-term rate of 1.1 spaces per dwelling unit was used for any housing included as part of the alternatives. Short-term parking was estimated based on the total daily visitor trips and an average turnover rate. A short-term parking turnover rate of 6.5 vehicles per space per day was applied to all land uses in all alternatives, with the exception of the retail space described in Alternative 1, for which a turnover rate of 10 vehicles per space per day was used.

Table D-11 presents the parking demand for each of the alternatives. Alternative 5 would generate the greatest parking demand of 1,440 spaces. Alternatives 1 through 4 would generate relatively similar parking demands, ranging from about 120 spaces less than Alternative 5 (Alternative 1) to 330 spaces less than Alternative 5 (Alternative 2). Alternative 6 would generate the lowest parking demand of 580 spaces.

TRANSPORTATION DEMAND MANAGEMENT

Table D-12 provides a comparison chart of the Transportation Demand Management (TDM) Strategies proposed for each of the Alternatives 1 through 6. The list of strategies is a compilation of all strategies proposed to date in either the GMPA or in development submittals from the RFQ for the Letterman Complex. Alternatives 1 and 6 assume the baseline TDM requirements for all Presidio Tenants. Alternatives 2 through 5 supplement these baseline strategies with strategies submitted by each proponent.

Table D-11
Estimated Parking Demand for Letterman Complex by Alternative

Alternative	Land Use	Size	Units	Weekday Long Term	Weekday Short Term	Reduction Due to Contiguous Housing	Total	Estimated Weekend Demand
Alternative 1	Research & Development	796,840	SF	1,110	180		1,290	
	Retail	7,982	SF	10	20		30	
	Storage	24,759	SF	0	0		0	
	1,150 parking spaces						**1,320**	**360**
Alternative 2	Office/Education/Health	420,000	SF	590	80	-220	450	
	Housing (400 units)	400	d.u.	440	0		440	
	Inn/Retreat	180,000	SF	220	0		220	
	1,020 parking spaces						**1,110**	**890**
Alternative 3	Conference Center	350	rooms	350	0		350	
	Office	450,000	SF	700	140		840	
	Assisted Living	100,000	SF	90	0		90	
	1,690 parking spaces						**1,280**	**590**
Alternative 4	Office	325,000	SF	508	102	-145	470	
	Digital Arts	200,000	SF	280	46	-75	250	
	Residential/Support (400 units)	400	d.u.	440	0		440	
	1,390 parking spaces						**1,160**	**660**
Alternative 5	Office & Support	900,000	SF	1,260	180		**1,440**	**720**
	1,530 parking spaces							
Alternative 6	Research & Development	356,000	SF	500	80		**580**	**140**
	774 parking spaces							

Source: Wilbur Smith Associates 1999

Notes:
SF = square feet
d.w. = dwelling unit

Table D-12
Travel Demand Management Strategy Comparison Matrix

TDM Element	Alt. 1	Alt. 2	Alt.3	Alt. 4	Alt. 5	Alt. 6
Programs/Services						
Onsite transit pass sales	●	●	●	●	●	●
Transportation Coordinator				●	●	
TMA membership					●	
Express bus service to regional transit hubs	●	●	●	●	●	●
Periodic monitoring surveys	●	●	●	●	●	●
Midday transit tickets availability					●	
Transit incentives					●	
Rideshare incentives					●	
Carpool/vanpool matching		●		●	●	
Guaranteed ride home program			●	●	●	
Vanpool program				●		
Class II bicycle lanes		●				
Presidio Shuttle Bus System	●	●	●	●	●	●
Subsidize Improved MUNI Service				●		
Shuttle to BART & MUNI Metro			●	●		
Car sharing		●	●	●		
Bicycle sharing		●		●		
Webpage	●	●	●	●	●	●
Promote/host transportation fairs/events		●			●	
Portion of housing allocated to tenants		●				
New employee orientations	●	●	●	●	●	●
Flex-time policy			●	●	●	
Telecommuting policy			●	●	●	
Distribution of materials					●	
Airport shuttle			●			
Physical Amenities						
Secure bicycle parking	●	●	●	●	●	●
Onsite ATM			●			
Onsite restaurants		●	●		●	
Onsite daycare					●	
Onsite retail		●		●	●	
Health club			●		●	
Pedestrian and bicyclist amenities		●	●	●	●	
Parking Policy						
Constrain supply match modal goals			●			●
Preferential carpool/vanpool parking			●	●	●	
Market rate for employees, visitors						
Special event TDM Promotions	●	●	●	●	●	●
Time restrictions for short-term spaces		●		●		
Cashing out			●	●		

THE PRESIDIO TRUST

FINANCIAL MANAGEMENT PROGRAM

REPORT TO CONGRESS
JULY 8, 1998

THE PRESIDIO TRUST
P.O. BOX 29052
THE PRESIDIO OF SAN FRANCISCO, CA 94129

THE PRESIDIO TRUST

FINANCIAL MANAGEMENT PROGRAM

REPORT TO CONGRESS
JULY 8, 1998

Presidio Trust Board of Directors

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Executive Director

James E. Meadows

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APPENDIX B - SUMMARY OF ANNUAL CASH FLOWS

FINANCIAL MANAGEMENT PROGRAM

FOR THE PRESIDIO OF SAN FRANCISCO

FINANCIAL MANAGEMENT PROGRAM SUMMARY

The United States Congress established the Presidio Trust as a wholly owned federal government corporation by enactment of Public Law 104-333 (the Trust Act), signed by President Clinton on November 12, 1996. The stated duties of the Trust are to manage the leasing, maintenance, rehabilitation, repair and improvement of property within the Presidio. Pursuant to the requirements of the Act, by July 8, 1998 the Presidio Trust must submit to Congress a plan showing how the Trust could become independent of federal appropriations within 15 complete fiscal years after the first meeting of the Trust's Board of Directors; i.e., by fiscal year 2013. This report presents the required plan.

The Presidio Trust Financial Management Program shows that the Trust will preserve and enhance the Presidio as an environmentally and economically sustainable national park in an urban area and achieve financial self-sufficiency by fiscal year 2013.

The Trust prepared the Financial Management Program as a long-range projection based on the direction of the Trust Act and the implementing policies and financial assumptions outlined in this report. Program highlights include:

- Federal appropriations declining to zero by fiscal year 2013.
- Adherence to the general objectives of the Golden Gate National Recreation Area General Management Plan Amendment for the Presidio.
- Market-rate leasing of residential and non-residential properties.
- Renovations funded by Treasury borrowing and lease revenues.
- Efficient management of operating costs.
- Capture of utility revenues.
- Set-aside of adequate reserves for replacement, renovation, and restoration of buildings, landscaping, infrastructure improvements, and natural resources into the future.

This report first provides background information about the Presidio and the Trust, including the Trust's activities to date. It then discusses the methodology used to develop the Financial Management Program. The next sections discuss underlying policies and assumptions, organized into general, non-

residential, residential, and open space categories. The financial management program is summarized in a series of exhibits at the end of the report.

BACKGROUND

The Presidio of San Francisco is one of America's great natural and historic sites, with multi-dimensional significance.

HISTORIC SIGNIFICANCE

Designated a National Historic Landmark in 1962, the Presidio represents over 200 years of military history under three nations' flags; the post has played a logistical role in every U.S. military engagement since the Mexican-American War and supported America's global efforts during both the Spanish-American War and World Wars I and II. The park is a showcase of military architectural styles dating from before the Civil War; it contains 870 structures, over 500 of which have historic and cultural significance.

NATURAL AND SCENIC RESOURCES

The 1,480-acre Presidio is a place of unparalleled scenic beauty, with spectacular views of the Pacific Ocean, the coastline, the Golden Gate and the City of San Francisco. It has over 800 acres of undeveloped open space, including native plant communities that preserve rare and endangered plant species and provide valuable wildlife habitat. The Presidio's coastal landscape and dunes offer extraordinary natural integrity and diversity.

A NATIONAL PARK IN AN URBAN AREA

The Presidio was designated part of the Golden Gate National Recreation Area in 1972. Selected for closure as a military base in 1989, its jurisdiction transferred to the National Park Service in 1994. Between 1990 and 1994, the National Park Service conducted a public planning process to develop a plan for the Presidio. Approved in 1994, the General Management Plan Amendment for the Presidio of San Francisco outlines a vision for the preservation and enhancement of the park, including a recommendation that key operational functions be assumed by an innovative public/private partnership.

THE PRESIDIO TRUST

Public Law 104-333 (the Trust Act) establishes the Presidio Trust as a Federal government corporation subject to the requirements of the Government Corporation Control Act. The Trust Act authorizes the Trust to manage a majority of the Presidio's land area by transfer of responsibility from the National Park Service by no later than July 8, 1998. By agreement, this transfer occurred on July 1, 1998. The Trust's area of responsibility, defined in Title I of the Trust Act as Area B, includes nearly all built areas of the park. Area A, the coastal area of the Presidio, remains under the management of the National Park Service, which also provides public safety and interpretive functions throughout the Presidio. The entire Presidio remains a part of the Golden Gate National Recreation Area. A map depicting Areas A and B is attached as Appendix A.

The Trust Act requires the Trust to manage the Presidio in accordance with the purposes set forth in Section One of the Act that established the Golden Gate National Recreation Area (Public Law 92-589).

PRESIDIO TRUST MISSION, GOALS, AND OBJECTIVES

The mission of the Presidio Trust is two-fold:

- Preserve and enhance the Presidio as a national park in an urban area.
- Achieve financial self-sufficiency by fiscal year 2013.

The Trust's goals include:

- Finding tenants and establishing programs which preserve natural, historic, scenic, cultural, and recreational resources, as well as educational and recreational opportunities.
- Establishing a sustainable community promoting ecological integrity, socio-economic diversity, and economic viability.
- Providing workforce housing at a full range of rent levels for up to half the people working at the Presidio.

GUIDES

In fulfilling these goals, the Trust will follow several fundamental guides:

- Trust Act (P.L. 104-333): The Trust's authorizing legislation sets forth Congressional intent and specific authorities and responsibilities, including compliance with the Government Corporation Control Act.
- United States Congress: Through its ongoing oversight and annual appropriation process, Congress will continue to provide programmatic and financial guidance to the Trust.

- 1994 General Management Plan Amendment for the Presidio: Developed through a four-year public planning process, the GMPA outlines the vision for the Presidio as a national park in an urban area. The general objectives contained in this document will guide Trust policy and decisions about resource protection and land and building use in Area B of the Presidio.

- Partnership with the National Park Service: The Trust is working closely with the National Park Service to ensure a smooth transition of responsibilities and an ongoing partnership in fulfilling Trust goals for the Presidio.

- A national focus: As a national park in an urban area, the Presidio is a special destination for people from all over the United States – and from around the world – to visit and enjoy. It is also experienced as a place to live, learn, work, and play on a daily basis. The Presidio Trust is committed to an ongoing program of outreach and responsiveness to its multiple communities, keeping as its primary focus its role within the National Park system and its corresponding responsibility to a national constituency, including the objective of reaching financial self-sufficiency by fiscal year 2013.

AUTHORITIES

The Trust Act grants the Presidio Trust the authority to:

- Lease Presidio buildings and facilities and retain lease revenues for dedicated use at the Presidio.

- Enter into financial, management, or service arrangements with other Federal agencies, state or local governments, and private or non-profit organizations.

- Provide guarantees of up to 75% of the principal of loans, the proceeds of which would be used to upgrade Federal facilities (predominantly historic buildings) at the Presidio.

- Borrow from the U.S. Treasury, with the aggregate amount of obligations outstanding at one time limited to $50 million.

- Hire, employ, and compensate staff under flexible procedures.

- Acquire goods and services using streamlined procurement procedures.

In addition to granting the authorities outlined above, the Trust Act requires the Trust to:

- Comply with the Government Corporation Control Act, which requires an annual audit of the Trust's financial statements.

- Submit a detailed annual report of Trust operations, activities, and accomplishments, and a description of goals for each current fiscal year to the Committee on Energy and Natural Resources of the United States Senate and the Committee on Resources of the House of Representatives.

- Cooperate with the General Accounting Office in an interim study of the Trust in the third year of Trust operations, and in a more comprehensive study during the seventh year.

ACTIVITIES AND ACCOMPLISHMENTS

The President appointed the Presidio Trust Board of Directors in April, 1997. The first meeting of the Board occurred on July 9, 1997. After a national search, the Board hired James E. Meadows to serve as Executive Director beginning January 5, 1998. Since January, the Trust's activities and accomplishments include the following:

- Organization: The Board of Directors has adopted bylaws, a 1998 and 1999 budget, a personnel policy, interim guidelines for contracting, a public outreach policy, an interim real estate leasing policy, and interim regulations for management of the Presidio.

- Staffing: The Executive Director has hired a staff of twenty-three in a variety of disciplines including facilities and operations management, law, human resources, financial analysis, environmental science, public affairs, planning and historic architecture, and real estate leasing. Consultants and contractors leverage staff resources in legal, environmental, financial, real estate, public affairs, and property management functions. The Trust will continue to recruit additional staff as necessary.

- Transition activities: The Presidio Trust is meeting regularly with National Park Service officials and staff, developing a series of operating agreements, and reviewing and analyzing National Park Service records, consulting studies, policies, and procedures in order to assure a smooth transition of management functions. The Trust expects to maintain this close coordination and cooperation with the National Park Service.

- Real Estate Leasing: The Trust issued Interim Real Estate Leasing Guidelines for fiscal year 1998. Pursuant to these guidelines, the Trust is offering six properties totaling 1.5 million square feet for lease through a Request for Qualifications (RFQ) process through September 30, 1998. The RFQ process ensures reasonable competition as required by Section 104(b) of P.L. 104-333. To date, the Trust has entered into negotiations for lease of two historic buildings totaling 82,000 square feet.

- Environmental Clean-up: The Trust has initiated an aggressive program to accelerate environmental clean-up by the Army to National Park standards. Activities include review of proposed remediation programs and suggestion of alternative methods to accomplish clean-up goals more efficiently, including an extensive joint effort among

the Trust, the Army, and the National Park Service to accelerate remediation at the Presidio.

- Financial Management Program: The Trust has focused on development of the financial management program required by the Trust Act and due to Congress on July 8, 1998. The development process is described in more detail below.

FINANCIAL MANAGEMENT PROGRAM DEVELOPMENT

METHODOLOGY

To develop the Presidio Trust Financial Management Program, Trust staff and consultants reviewed, analyzed, and synthesized information derived from the following sources:

- *Final General Management Plan Amendment, Presidio of San Francisco*, July 1994, National Park Service , U.S. Department of the Interior.
- Final General Management Plan Amendment Environmental Impact Statement, Presidio of San Francisco, National Park Service, Department of the Interior, July 1994.
- Presidio Building Leasing and Implementation Strategy, Keyser Marston & Associates, July 1994.
- Interviews with National Park Service staff.
- Consultant analyses of operating costs and housing.
- Consultant analyses of leasing revenues and costs.
- Consultant analysis of building rehabilitation and improvement costs.

The Trust also met with members of Congress, Congressional staff, and the Office of Management and Budget to provide briefings and discuss the draft program.

PUBLIC PARTICIPATION

To provide the public with maximum opportunity to learn about and comment on the Trust's Financial Management Program, the Trust held a series of public meetings, beginning with initial presentation of the draft program at a joint meeting of the Presidio Trust Board of Directors and Golden Gate National Recreation Area Advisory Commission on April 27, 1998. This meeting received local and national media coverage. The Trust conducted a series of workshops in May and June, which focused on more detailed non-residential, open space, and residential policies and assumptions. In addition to hosting the public workshops, the Presidio Trust presented the Financial Management Program to more than twenty neighborhood, community, civic, and business groups – an aggregate of approximately 1,000 citizens. The Trust shared information throughout this public process

with the Golden Gate National Recreation Area Advisory Commission, the body through which formal public input is provided to the Presidio Trust Board of Directors.

These participatory workshops and public presentations were well received and yielded valuable public input much of which was incorporated into this Financial Management Program. Many participants were interested in how to lease space or housing at the Presidio, others were residents of nearby neighborhoods or representatives of current tenant organizations interested in the future of the Presidio, and many were supporters of current and planned park preservation and restoration programs related to historic, cultural, and natural resources. Most comments were positive.

On June 10, 1998 the Golden Gate National Recreation Area Advisory Commission voted unanimously to approve a resolution supporting the Financial Management Program.

FINANCIAL MANAGEMENT PROGRAM POLICIES

The policies behind the Financial Management Program serve as a general work program for the Presidio Trust as it assumes management responsibility for Area B.

GENERAL POLICIES

- Preserve the Presidio as a national park in an urban area.
- Act in accordance with the general objectives of the 1994 General Management Plan Amendment.
- Achieve financial self-sufficiency by fiscal year 2013.
- Promote the preservation of historic buildings at the Presidio to the extent they are economically feasible to rehabilitate.
- Provide reserves for replacement of buildings, infrastructure, and open space to ensure long-term sustainability.
- Protect the Presidio from development and uses that would destroy the scenic beauty and natural character of the area or its historic, cultural, educational, and recreational resources.
- Cooperate with the National Park Service on provision of public interpretive services, visitor orientation, and educational programs.

NON-RESIDENTIAL LEASING POLICIES

- Lease non-residential space to nonprofit and for-profit entities that are appropriate for the Presidio per the general objectives of the 1994 General Management Plan Amendment.
- As required by the Trust Act, ensure reasonable competition for leasing opportunities by soliciting responses to requests for qualifications (RFQs) from a broad audience.
- As required by the Trust Act, in managing and leasing properties consider the extent to which prospective tenants contribute to the implementation of the General

Management Plan and to the reduction of cost to the Federal government. Priority is given to tenants that enhance the financial viability of the Presidio and that facilitate the cost-effective preservation of historic buildings through their reuse of such buildings.

RESIDENTIAL LEASING POLICIES

- Provide a full range of housing for people who work at the Presidio.
- Offer short-term market-rate leases to other Federal employees, specialty tenants (e.g., students, visiting faculty) and the general public, in that priority order, until demand from persons employed at the Presidio requires all the housing.
- Over time, replace Wherry and MacArthur Housing over time with more space-efficient apartments– such as studios and one-bedrooms.
- Investigate the possibility of moving Wherry Housing units off the Presidio.
- Convert selected dormitory buildings into housing for people who work at the Presidio.

OPEN SPACE POLICIES

- Preserve and enhance existing open space areas in cooperation with the National Park Service.
- Increase open space by as much as 200 acres.
- Use Wherry Housing rental revenues to fund the return of the site to natural open space.
- Implement a comprehensive vegetation management strategy for native plant communities, the historic forest, and landscaped areas.

FINANCIAL ASSUMPTIONS

The financial assumptions underlying the Financial Management Program are purposefully conservative, especially in the early years, in anticipation of market fluctuations and other uncertainties. In order to ensure the Trust meets its goal of financial self-sufficiency and adapts to changes and opportunities, there may be variations in uses and timing of transactions as Trust programs are implemented.

GENERAL FINANCIAL ASSUMPTIONS

- On the basis of today's forecasts, from fiscal year 2013 and forward, annual total revenues create a slight surplus after accounting for operating costs, capital reserves and financing costs.

- Federal appropriations for Trust operations decline from $25 million to zero by fiscal year 2013. The Trust forecasts a $625,000 annual decline in appropriations until 2010, after which appropriations decline more steeply.

- Trust revenues recover all costs by fiscal year 2013 so that the Trust is self-sufficient without federal appropriations.

- Operating costs for Area B of the Presidio are reduced over 15 years due to projected efficiency improvements.

- By fiscal year 2013, a capital reserve of $11.5 million is set aside annually for replacement of buildings, infrastructure, grounds, and natural areas to ensure long-term sustainability.

- All projections are made in 1998 dollars.

- Leases are at fair market value and include lease payments and nonmonetary returns when tenants make improvements to government properties. Tenant investments are secured by tenant leasehold interests. All properties remain under Federal ownership.

- Capital requirements to undertake building and infrastructure rehabilitation are funded through $50 million in U.S. Treasury borrowing. All loans are repaid by year 30, subject to terms and conditions prescribed by the Secretary of the Treasury.

- Private sector investment augments Treasury borrowing for building improvements. Private investment is supported by loan guarantees and historic preservation tax credits as warranted. The Trust's loan guarantee program will be used to encourage private investment. Loan guarantees will be structured to minimize cost to the Federal government and will be subject to Federal Credit Reform Act reporting requirements.

- Environmental remediation is full and timely.

NON-RESIDENTIAL FINANCIAL ASSUMPTIONS

For financial modeling purposes, the Trust has grouped revenue-generating non-residential properties into the following five clusters:

LETTERMAN HOSPITAL COMPLEX

- Letterman Hospital and Letterman Army Institute of Research (LAIR) buildings are demolished and replaced with equivalent square footage in new lower-profile Class A office buildings that are architecturally compatible with the Presidio.

- A long-term ground lease is made to a tenant that invests almost $200 million in new buildings.

- Ground lease terms are projected based on a $40 per square foot Class A fully serviced office rent.

- Existing office uses at Thoreau Center continue.

- Reuse begins in 2000 and 1.1 million square feet is in use by 2004.

GENERAL OFFICE

- 600,000 square feet of existing office space - mostly in the Main Post area - will be leased and renovated through a combination of Presidio Trust and tenant investment.

- Initial occupancy begins in 1999 and lease up occurs over an eight-year period.

- Office rents average $28 per square foot on a fully serviced basis assuming that the Trust undertakes the building improvements. The Trust has assumed this rent level to reflect an average of the last four years' Class B office rents in San Francisco, rather than predicating a 30-year plan on the current strong market.

- Rehabilitation costs of $86 per square foot are estimated based on prior renovation experience at the Presidio.

- For-profit tenants will use historic preservation tax credits to help finance building rehabilitation. This has not been factored into financial estimates.

FORT SCOTT

- 250,000 square feet of existing barracks and office space at Fort Scott is renovated into a conference center/lodging facility, including office space.

- Conference center with 250 guestrooms would open by 2007.

- $148 per square foot is invested in building renovation.

- Historic tax credits contribute $18 per square foot, resulting in a net development cost of $130 per square foot.

- Average room rates are $100 per night with an occupancy factor of 80%.

PUBLIC HEALTH SERVICE HOSPITAL

- The non-historic wings of the Public Health Service Hospital are removed. The entire structure is either re-used or removed.

- A long-term ground lease is made to a tenant that invests in building improvements and pays annual ground lease rent of at least $1.1 million.

- Reuse of 400,000 square feet is complete by 2001.

GOLF COURSE/CONCESSIONS/UTILITIES

- Revenues from the golf course and the existing concession contracts contribute $1.5 million of annual revenue.

- The utility systems of the Presidio generate increasing revenues, with $1 million annual revenue by 2013.

- Special events or other miscellaneous revenues are not significant.

RESIDENTIAL FINANCIAL ASSUMPTIONS

HOUSING TYPES

- There are 1,119 current housing units at the Presidio.

- During military use, barracks and dormitory buildings accommodated 1,238 beds, including those in shared rooms. Some of these buildings will be converted to non-residential uses, such as lodging. Some of the dorms will be used as group housing, such as for Swords to Plowshares, a federally funded non-profit transitional housing and training program for veterans. Others will be renovated and converted to provide small housing units for people who work at the Presidio.

- As units are removed to create open space, replacement units will be added in appropriate areas of the Presidio.

- The General Management Plan Amendment shows use of certain historic housing units for lodging. Initially, these units will be rented as residences, until lodging economics support conversion.

The following table summarizes the existing and planned future housing stock:

Exhibit 1 Existing and Planned Future Housing Stock

	Existing Conditions	Future Conditions
Dormitory/Barracks	0 units	500 units (1)
	(1,238 beds) (1)	(0 beds)
Wherry/MacArthur	518 units	0 units
Non-Historic Townhouses	300 units	300 units
Historic Housing	301 units	298 units

Replacement Housing	0 units	500 units
Total	1,119 units (2)	1,598 units (1)

1 Dormitory housing is measured by bed count in the Final General Management Plan Amendment Environmental Impact Statement. Future condition unit count reflects conversion of dormitory square footage to studio and one-bedroom apartment units.
2 Does not include dormitory bed count.

HOUSING RENOVATION PROGRAM

- Over the next four years, all existing units are rented on an interim basis with sufficient upgrades necessary to correct life-safety deficiencies and make cosmetic upgrades and repairs. For all units except Wherry Housing, these initial costs are estimated at $16,800 per unit.

- Wherry Housing and MacArthur housing are used on an interim basis consistent with the General Management Plan Amendment. Removal of these units is phased over a period of up to 30 years. Renovation costs for Wherry Housing vary based on the anticipated time of reuse prior to removal.

- Interim use of these units generates sufficient revenues to fund the removal and replacement of these units and restoration of open space as called for in the General Management Plan Amendment.

- Housing is prioritized to permit leasing of units needing minimal renovation in late summer 1998.

- Loans from the Treasury will be used to fund the initial necessary housing renovations. Housing needs require most of the Trust's borrowing capacity in the initial years.

- As contemplated by the Trust Act, a more complete renovation of the housing units including building system replacements and seismic upgrade is deferred until four years after their initial rental. Such renovations are funded out of housing operations commencing four years after the initial rental of the unit. The costs of this second renovation are assumed to average $33,200 per unit with an additional $20,000 per unit for infrastructure upgrades.

HOUSING RENTS

- Housing rents will be market-based. Rents for some units will be reduced to reflect current unit conditions.

- The Trust is working to have available units at a full range of rent levels so that a complete cross-section of people who work at the Presidio can afford to live on the Presidio.

OPEN SPACE PROGRAM ASSUMPTIONS

- Presidio open space increases by 25 percent over the next 30 years, from 800 to 1,000 acres.
- Ultimately, two-thirds of the Presidio is open space.
- Scenic views from the Presidio, as well as those features that contribute to its visual quality, are preserved and enhanced through site improvements.
- Capital costs for parkwide improvements, including open space improvements, are $50 million over the next fifteen years.
- Enhancements to the Golden Gate Bridge toll plaza, Lobos Creek, the San Francisco National Cemetery, and the Golf Course are not included in the cost figures. These areas are either outside the Trust's management jurisdiction, or are privately funded.

NATURAL RESOURCES

The Trust, in cooperation with the National Park Service, plans to meet the following objectives:

- Native plant habitat is restored in many places throughout the Presidio.
- Wildlife species and their habitats are protected.
- Historic Presidio forest is restored.
- Mountain Lake is revitalized.
- The Main Post's historic parade ground is restored.
- Riparian corridors are restored and enhanced.
- Native plant communities and the Presidio forest are restored as ongoing projects funded through a combination of Trust funds, philanthropic grants and other funding sources. On-site native plant nursery programs are continued and expanded when possible.
- Volunteer efforts and educational programs are expanded and used to restore and sustain native plant communities.
- A Vegetation Management Plan is currently being prepared in partnership with the National Park Service. It will provide management strategies for three general vegetation zones: native plant communities, the historic forest and landscaped areas.

The proposed plan and environmental assessment will be released for public comment in the summer of 1998.

RECREATIONAL RESOURCES

- Hiking trails are increased from eight to 11 miles.
- Fourteen miles of biking routes are designated along existing corridors.
- Crissy Field (Area A), under the management of the National Park Service, is transformed into a dynamic shoreline park.
- Outdoor recreational facilities such as ball fields and playgrounds are built and improved.
- Rob Hill group camping area is retained and improved.
- Bay Area Ridge Trail section through the Presidio is completed and other trail improvements are made.

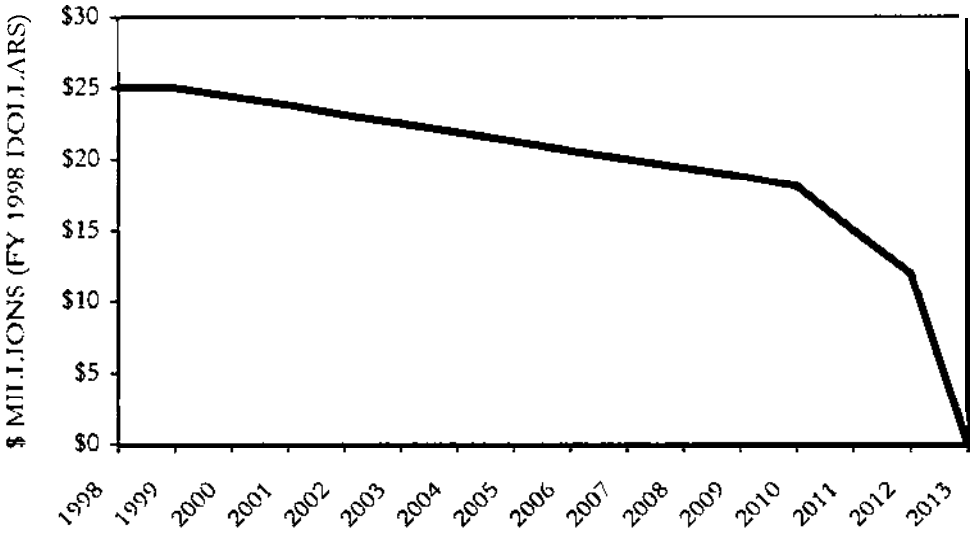
FINANCIAL MANAGEMENT PROGRAM SUMMARY

The Presidio Trust Financial Management Program, summarized in spreadsheet form in Appendix B, demonstrates the feasibility of financial self-sufficiency for the Presidio. The program is a long-range projection, subject to adjustment over time. Given the assumptions outlined above, including continued federal appropriations at the levels specified, the Trust should achieve its mission by fiscal year 2013 and ensure that the Presidio remains viable into the future.

Financial Management Program highlights include:

. Declining Federal appropriations: As illustrated in Exhibit 2, the Trust assumes Federal appropriations decline by $625,000 per year through 2010, after which they decline more steeply to a zero level in fiscal year 2013. Appropriated funds will be used to fund a declining percentage of operating costs, allowing lease revenues to be invested in property renovations to ensure future cash flow and retirement of Treasury debt.

Exhibit 2: Federal Appropriations



. Decreasing operational costs: Through operating efficiencies implemented by the Trust, and Federal and private investment in infrastructure improvements, the Trust will decrease operational costs at the Presidio. Exhibit 3 summarizes costs over fifteen and thirty year timeframes.

Exhibit 3 Summary of Costs
(Millions of FY 1998 Dollars)

	15 YEAR TOTAL	30 YEAR TOTAL
Operating Budget	$380	$729
Improvements/Demolition		
Non-Residential Buildings	84	84
Residential	112	118
TOTAL	196	202
Replacement Reserves*		
Non-Residential Buildings	36	111
Residential	25	78
-Expended for res'l replacement	(25)	(25)
Infrastructure	11	33
Parkwide Improvements	11	33
TOTAL	58	230
Grounds and Infrastructure		
Non-Residential Buildings	35	35
Residential	31	31
Parkwide Improvements	50	50
TOTAL	116	116
TOTAL COSTS	$750	$1,277

* 30-yr. totals do not reflect all expenditures of reserves that might be required in years 15-30.

- Increasing revenue: As residential and non-residential square footage is leased, revenues will increase. Exhibit 4 illustrates projected revenues.

Exhibit 4: Revenue Sources
(Millions of FY 1998 Dollars)

	15 YEAR TOTAL	30 YEAR TOTAL
Revenues		
Non-Residential Net Lease **Revenue**	$172	$431
Residential Net Lease Revenue	248	604
Federal Appropriation	311	311
Starting Revenue	1	1
Utilities Revenue	11	26
Total Net Revenues	743	1,373
(Net of Building Operating Costs)		
Financing		
Treasury Borrowing	50	50
Debt Service	(41)	(118)
TOTAL	9	(68)
Total Revenues After Debt Service	$752	$1,305

- Financial self-sufficiency by fiscal year 2013: As indicated by the financial snapshot illustrated in Exhibit 5, the Trust plans to reach stabilized self-sufficiency by fiscal year 2013.

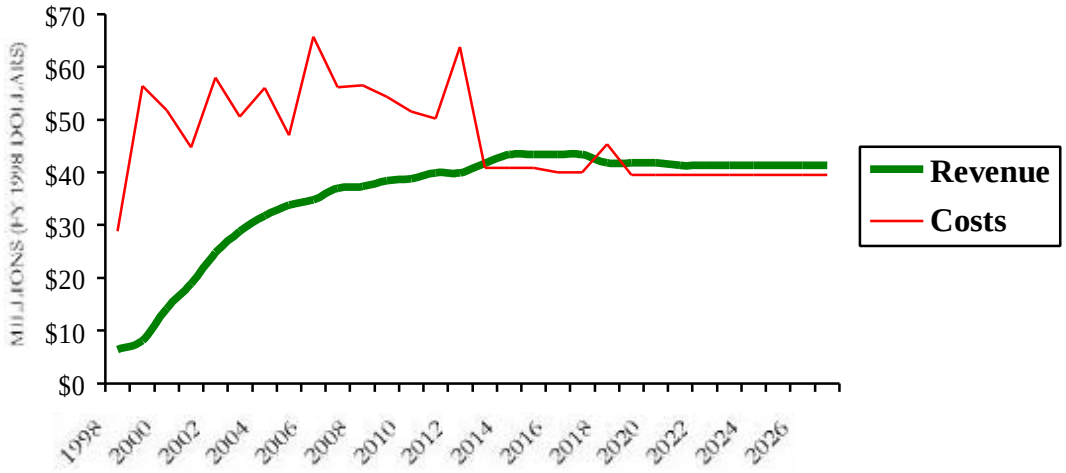
Exhibit 5: Fiscal Year 2013: Self-Sufficiency

(FY 1998 Dollars)

Costs		**$35.7 million**
- Operations	$24.2 million	
- Renovation/replacement	11.5 million	
Revenue		**$36.6 million**
- Non-residential leasing	$15.0 million	
- Residential leasing	20.6 million	
- Utilities	1.0 million	
- Federal appropriations	$ 0.0	

- Exhibit 6 shows that self-sufficiency is maintained going forward.

Exhibit 6: Revenue and Cost Summary



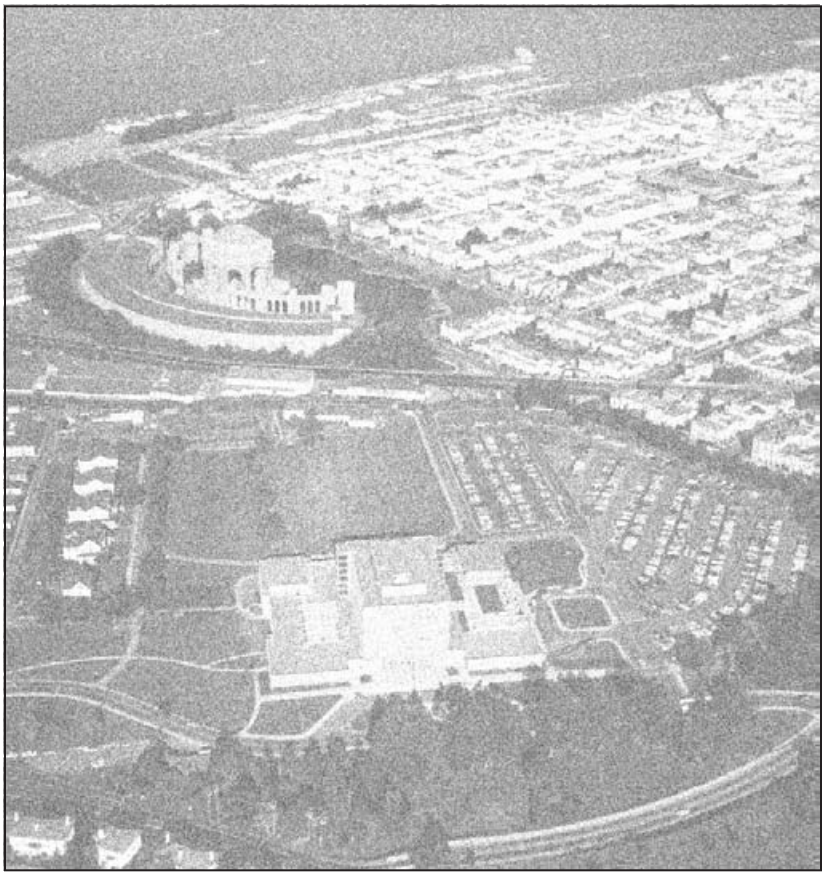
CONCLUSIONS

Through careful stewardship of the Presidio's resources and utilization of the authorities granted by the Trust Act, the Presidio Trust will deliver the results expected by the U.S. Congress:

- Enhancement of the Presidio as an outstanding National Park in an urban area.
- Financial self-sufficiency by fiscal year 2013.
- Demonstration of economic, environmental, and cultural sustainability.
- Use of private sector resources.
- Continuation of broad public support for the Presidio.

APPENDIX A – AREA A/B MAP

APPENDIX B - SUMMARY OF ANNUAL CASH FLOWS



The attached Programmatic Agreement is a true copy of the final executed agreement. A copy of the signed version of the final Programmatic Agreement is available for review at the Presidio Trust.

PROGRAMMATIC AGREEMENT

AMONG THE PRESIDIO TRUST, THE ADVISORY COUNCIL ON HISTORIC PRESERVATION, THE NATIONAL PARK SERVICE AND THE CALIFORNIA STATE HISTORIC PRESERVATION OFFICER

REGARDING DECONSTRUCTION, NEW CONSTRUCTION, AND THE EXECUTION OF ASSOCIATED LEASES AT THE LETTERMAN COMPLEX, PRESIDIO OF SAN FRANCISCO, CALIFORNIA

WHEREAS, the Presidio Trust, pursuant to the Presidio Trust Act, Title I of PL 104-333, proposes deconstruction, new construction, and the execution of leases associated with such new construction (Undertakings), on the 60 acre site of the Letterman Complex within Area B at the Presidio of San Francisco, California depicted on the map attached hereto as Appendix A-1 (the Letterman Complex); and

WHEREAS, the Presidio Trust is the Agency with sole responsibility for the Undertakings and for compliance with the National Historic Preservation Act with regard to the Undertakings; and

WHEREAS, the Undertakings currently proposed by the Presidio Trust are the deconstruction and new construction activities and execution of leases associated with such new construction contemplated under that certain document entitled Final Environmental Impact Statement and Planning

Guidelines for New Development and Uses within the Letterman Complex (the Letterman FEIS); and

WHEREAS, the Presidio Trust has determined that the Undertakings may have an effect on the Presidio of San Francisco, a National Historic Landmark, and has consulted with the Advisory Council on Historic Preservation (Council) and the California State Historic Preservation Officer (SHPO) pursuant to § 800.14(b)(3) and § 800.10 of 36 CFR Part 800, regulations implementing Section 106 of the National Historic Preservation Act, as amended (16 U.S.C. §470f), and pursuant to Section 110f of the same Act; and

WHEREAS, the National Parks and Conservation Association and the National Trust for Historic Preservation have been invited to concur in this PA; and

WHEREAS, the Presidio Trust, the Council and the SHPO have consulted with the National Park Service (NPS) regarding the Undertakings and have invited NPS to sign this Programmatic Agreement (PA) pursuant to 36 CFR 800.6(c)(3);

NOW, THEREFORE, the Presidio Trust, the Council, NPS and the SHPO agree that upon the Presidio Trust’s decision to proceed with the Undertakings, the Undertakings will be administered in accordance with the following stipulations to satisfy the Presidio Trust’s Section 106 and Section 110f responsibilities for all aspects of the Undertakings.

STIPULATIONS

I. APPLICABILITY OF THE PA

The Presidio Trust shall comply with the stipulations set forth in this PA for all aspects of the Undertakings covered by this PA at the 60 acre Letterman complex. With the exception of the execution of leases associated with new construction, the reviews established by this PA shall be completed before the Presidio Trust proceeds with any Undertaking that could adversely affect historic properties. The Presidio Trust shall be guided by 36 CFR § 800.5(a)(1-2) in determining whether an action may adversely affect historic properties. Nothing in this PA shall preclude the Presidio Trust from proceeding with materials, soils and archeological testing that complies with the intent of 36 CFR § 800.1(c) or from deconstructing the Letterman Hospital and the Letterman Army Institute of Research to existing grade level.

II. AREA OF POTENTIAL EFFECTS

The Area of Potential Effect (APE), as defined in 36 CFR § 800.16(d), for deconstruction, new construction and leases associated with such new construction on the 23-acre portion of the 60-acre site as contemplated under the Letterman FEIS has already been delineated and agreed upon by the parties hereto. The map at Appendix A-2 depicts that APE. The Presidio Trust will delineate an APE in consultation with the SHPO, NPS, and the Council for any other Undertaking covered by this PA when a scope of work has been defined.

III. PROFESSIONAL QUALIFICATIONS STANDARDS

The Presidio Trust shall ensure that all historic preservation activities prescribed by this PA are carried out by or under the direct supervision of a person or persons meeting at a minimum the "Secretary of the Interior's Professional Qualifications Standards" (48 FR 44738-39) in the relevant disciplines.

IV. INITIAL REVIEW

A. The Presidio Trust has conducted a public planning session to solicit comments on initial draft Design Guidelines for New Construction in the Letterman Complex (IDG). The Trust will submit to the Council, SHPO, and NPS for review and comment, a consultation package for new construction in the Letterman Complex. Consultation packages will be submitted at least 21 calendar days prior to a consultation meeting as scheduled by the Presidio Trust and shall include, but not necessarily be limited to, Final Planning Guidelines as presented in the Letterman FEIS, the IDG, written comments on the IDG received from the public, the Presidio Trust's record of commentary from the public planning session and a draft document combining Final Planning Guidelines and Design Guidelines (the Guidelines) that have been incorporated into one document in response to public comment. The Presidio Trust shall ensure that the IDG and the Guidelines conform to the "Secretary of the Interior's Standards for the Treatment of Historic Properties with

Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings," 1995 (Standards).

B. A consultation meeting will be held, in person or by telephone, with SHPO, NPS, the Council and the Trust to discuss the IDG and the Guidelines and to seek a consensus among those parties that the IDG and the Guidelines conform to the Standards. If no consensus is reached at the conclusion of the consultation meeting, the Presidio Trust will proceed in accordance with paragraph E. of this stipulation.

C. Within 14 calendar days following successful conclusion of the consultation, the Presidio Trust will distribute to the SHPO, NPS, and the Council for comment a final draft (Final Draft Guidelines or FDG) reflecting the consensus reached pursuant to paragraph B. of this stipulation and incorporating such comments received from the public pursuant to paragraph A. above that the Presidio Trust deems appropriate. Those parties will have 14 calendar days following the date of receipt to provide comments to the Trust regarding what changes, if any, are necessary to cause the FDG to reflect the consensus reached pursuant to paragraph B of this stipulation.

D. If the Presidio Trust, pursuant to paragraph C. of this stipulation, modifies the FDG in accordance with Council, SHPO and NPS comments, the Presidio Trust may finalize the FDG and will immediately provide each of the other parties with a copy of the Final Guidelines for New Construction in the Letterman Complex (Final Guidelines). The Final Guidelines will not be subject to further review.

E. Should the Presidio Trust decide not to modify the FDG in accordance with any Council, SHPO or NPS comments regarding conformity with the Standards, or if a consensus on the IDG and the Guidelines is not reached pursuant to paragraph B. of this stipulation, the Presidio Trust will promptly notify the other parties in writing of the Trust's decision or of the failure to reach consensus, include documentation that explains the basis for the Trust's decision or summarizes the reasons for failure to reach consensus, and immediately initiate consultation with the Council, SHPO and NPS to address the Trust's decision regarding the FDG or the failure to reach consensus regarding the IDG and the Guidelines. The time frame for this consultation shall not exceed 14 calendar days. If the issues pertaining to the Trust's decision are resolved or a consensus is reached within this time frame, then the FDG, the IDG, or the Guidelines shall be modified if necessary by the Presidio Trust in accordance with the resolution or consensus. Thereupon, the Presidio Trust may proceed in accordance with paragraphs C. or D., as applicable, of this stipulation. If the issues pertaining to the Trust's decision are not resolved or a consensus is not reached within this time frame, the Presidio Trust will forward all documentation relevant to the dispute to the Council for response within 30 calendar days in accordance with Stipulation XI, below, governing the resolution of disputes.

F. Failure of the Council, the SHPO or NPS to comment in writing within the times frames established by this stipulation on any document submitted

for review pursuant to this stipulation, will be deemed approval of the document.

V. PROJECT DOCUMENT REVIEW

A. The Presidio Trust will ensure that all or any combination of the documents that may be developed for new construction within the Letterman Complex at the following stages conform to the fullest reasonable extent to the Final Guidelines: conceptual design, schematic design, and construction documents. The Trust will hold a public planning workshop to gather public comment on conceptual design drawings. The Trust will consider public comments on the conceptual design drawings.

B. The Presidio Trust will submit all conceptual design documents and all schematic design documents (Project Documents) to the SHPO, NPS, and the Council for review and comment regarding conformity to the Final Guidelines. At the conceptual design review, submittals will also include any written comments made by the public on the conceptual design drawings and the Presidio Trust's record of commentary from the public planning workshop. All parties shall have 21 calendar days after receipt to comment upon documents at the conceptual design stage. The SHPO, NPS, and the Council will have 21 calendar days after receipt at the schematic stage to comment.

C. The Presidio Trust will consider all comments regarding conformity of the Project Documents to the Final Guidelines, including issues of scale, configuration, massing, height, bulk, siting, orientation, exterior cladding,

fenestration, circulation and landscaping, from the SHPO, NPS, and the Council and may consider any other comments from the SHPO, NPS, and the Council.

D. At its discretion, the Presidio Trust may modify Project Documents, to the extent it deems appropriate, in accordance with comments from the public. If the Presidio Trust modifies Project Documents in accordance with public comments, the Trust will provide SHPO, NPS and the Council with copies of the modified Project Documents. Those parties will have 14 calendar days following date of receipt to provide comments to the Presidio Trust. The Presidio Trust may modify the Project Documents to the fullest reasonable extent in accordance with SHPO, NPS, and any Council comments pursuant to paragraphs B. and C. above. If the Presidio Trust, modifies Project Documents in accordance with SHPO, NPS, and any Council comments, the Presidio Trust will promptly notify the SHPO, NPS, and the Council, and include with the notification, copies of the modified Project Documents (including such changes made based on comments from the public that the Presidio Trust deems appropriate). Such Project Documents will not be subject to further review.

E. Should the Presidio Trust decide not to modify Project Documents in accordance with SHPO, NPS and any Council comments regarding conformity of the Project Documents to the Final Guidelines with respect to scale, configuration, massing, height, bulk, siting, orientation, exterior cladding, fenestration, circulation, and landscaping, the Presidio Trust will promptly notify the SHPO, NPS and the Council, of the decision in writing, include

documentation that explains the basis for the decision, and immediately initiate consultation with the SHPO, NPS, and Council to address the decision. The time frame for this consultation shall not exceed 14 calendar days. If the issues pertaining to the decision are resolved within this time frame, the Presidio Trust will modify if necessary the Project Documents in accordance with the terms of the resolution. If the Project Documents are so modified, the Presidio Trust will proceed in accordance with paragraph D. of this stipulation. If the resolution stipulates that no modification is necessary, the Project Documents will not be subject to further review. If the issues pertaining to the Trust's decision are not resolved within this time frame, the Presidio Trust will forward all documentation relevant to the dispute to the Council for response within 30 calendar days in accordance with Stipulation XI, below, governing the resolution of disputes.

F. Failure of the SHPO, NPS, or, if participating, the Council, to comment in writing within the time frames established by this stipulation on any Project Documents submitted for review pursuant to this stipulation, will be deemed approval of the Project Documents. Failure to comment authorizes the Presidio Trust to proceed with the next stage of design.

VI. RECORDATION

A. Prior to the start of any deconstruction covered by this PA, including an Undertaking affecting Building 1055 or the two tennis courts within the APE, the Presidio Trust shall complete recordation documentation in accordance with Historic American Building Survey (HABS) standards (level 2). This recordation

shall be the sole mitigation necessary prior to the deconstruction of Building 1055 or the two tennis courts. During deconstruction, the Presidio Trust shall follow the relevant procedures of Appendix B regarding archeological matters. The Presidio Trust shall contact the National Park Service (NPS) c/o HABS, 600 Harrison Street, Suite 600, San Francisco, CA 94107-1372 to obtain guidance regarding the specifications for completing the documentation. All documentation will be submitted to SHPO. The Presidio Trust shall submit the documentation to the Presidio National Park Service Archives and a duplicate copy to the San Francisco History Room in the San Francisco Main Library.

B. Recordation documentation for any deconstruction covered by this PA shall include but shall not be limited to large-format (4″x 5″ or larger negative size) black and white photographs of all sides of the exterior of historic resources to be deconstructed or altered. Contextual photographs and the significant interiors of historic resources to be deconstructed or altered shall also be recorded and processed for archival permanence in accordance with the Historic American Building Survey Photographic Specifications.

C Until the recordation documentation, as set forth above, is completed and submitted to NPS, the Presidio Trust shall continue to implement reasonable measures to ensure that historic properties which will be deconstructed or altered are secure and protected against further damage or deterioration.

VII. CONSULTATION REGARDING FUTURE PLANS FOR DECONSTRUCTION

If the Presidio Trust proposes to alter, deconstruct or remove any historic structures other than Building 1055 or the two tennis courts, the Presidio Trust shall comply with 36 CFR 800.5 and 800.6 for each such undertaking. Alternatively, the Presidio Trust may comply with Section 106 through an amendment to this PA or the execution of a subsequent agreement document that establishes a process the parties agree will adequately substitute for individual consultation. In any situation where it is agreed that recordation will serve as all or part of the mitigation, procedures for recordation shall be as outlined in Stipulation VI.

VIII. CONSTRUCTION MONITORING

A. The Presidio Trust will ensure that all construction documents and all new construction work within the Letterman Complex conform to the Final Guidelines and approved Project Documents.

B. If construction monitoring identifies any conflicting conditions, or if changes to approved project construction documents are proposed (i.e., change orders), the Presidio Trust will review the proposed changes. If the Presidio Trust denies the proposed changes, or if the Presidio Trust approves the proposed changes and the approved changes do not relate to issues of scale, configuration, massing, height, bulk, siting, orientation, exterior cladding, fenestration, circulation, or landscaping, no further consultation will be required. If the Presidio Trust does not deny the proposed changes,

and the changes do relate to the issues listed in the preceding sentence, the Presidio Trust, in consultation with the SHPO, NPS, and the Council will determine whether the proposed changes conform to the fullest reasonable extent to the Final Guidelines. Such consultation shall not exceed 7 calendar days. If the parties agree that the proposed changes conform to the fullest reasonable extent to the Final Guidelines or agree that the proposed changes do not conform to the Final Guidelines but will not adversely affect historic properties, the construction may proceed as modified hereunder in scope or manner.

C. If the parties do not reach an agreement pursuant to paragraph B. of this stipulation, the Presidio Trust will render a decision regarding the disagreement within 14 calendar days following closure of the 7-day consultation period. The Presidio Trust will notify the other parties of its decision in writing within this time frame. In reaching its decision, the Presidio Trust will take all comments from the other parties into account. Thereafter, the Presidio Trust may authorize construction in accordance with the terms of its decision.

IX. ARCHEOLOGICAL PROPERTIES

The Presidio Trust will address archeological properties within the Letterman Complex in accordance with Appendix B of this PA. If archeological properties are discovered during implementation of Undertakings, such properties will be addressed in accordance with Appendix B, as modified by any agreements reached pursuant to Stipulation X., below.

X. DISCOVERIES AND UNFORESEEN EFFECTS

A. The Presidio Trust will notify the SHPO and NPS as soon as practicable if it appears that an Undertaking will affect a previously unidentified property that may be eligible for inclusion in the National Register of Historic Places (NRHP) or affect a known historic property in an unanticipated manner. The Presidio Trust may stop construction in the vicinity of the discovery and will take all reasonable measures to avoid or minimize harm to the property (as authorized under the “Monitoring” provision of Appendix B to this PA) until the Presidio Trust concludes consultation with the SHPO and NPS. The Presidio Trust may assume that the property is NRHP eligible for purposes of this PA. The Presidio Trust will consult with SHPO and NPS to develop actions that will take the effects of the Undertaking on the property into account. The Presidio Trust will notify the SHPO and NPS of any time constraints, and the Presidio Trust, the SHPO and NPS will mutually agree upon time frames for this consultation which in no event shall exceed 14 calendar days. The Presidio Trust will provide the SHPO and NPS with written recommendations reflecting the consultation. If the SHPO or NPS do not object to the Presidio Trust’s recommendations within the agreed upon time frame for response to recommendations, the Presidio Trust will modify the scope of work for the Undertaking as necessary to implement the recommendations and may proceed with the Undertaking as modified hereunder.

B. The Presidio Trust may assume that failure by the SHPO or NPS to respond within the agreed upon time frame constitutes concurrence with the Presidio Trust's recommendations.

C. If the SHPO or NPS object to the Presidio Trust's recommendations within the agreed upon time frame, the parties shall consult for no more than 5 calendar days to resolve the objection. If the objection is resolved, the Presidio Trust will modify the scope of work for the Undertaking as necessary to implement the resolution reached by the parties and may proceed with the Undertaking as modified hereunder. If the objection is not resolved within the 5 day consultation time frame stipulated herein, the Presidio Trust will render a decision regarding the objection and notify the other parties in writing of its decision within 2 calendar days following closure of the consultation time frame. In reaching its decision, the Presidio Trust will take all comments from the other parties into account. Thereafter, the Presidio Trust may proceed with the Undertaking in accordance with the terms of its decision.

XI. DISPUTE RESOLUTION

A. Any signatory to this PA may object at any time, to the manner in which the terms of this PA are being implemented, or to any document prepared in accordance with the terms of this PA. Where stipulated in this PA, objections shall be governed by specified time frames. Otherwise, a signatory may object in a reasonable and timely manner to the manner in which

the terms of this PA are being implemented, or to any document prepared in accordance with the terms of this PA.

B. The Presidio Trust will consult with the objecting party for no more than 14 calendar days following receipt of notice of the objection to resolve the objection. If the Presidio Trust determines at the end of this time frame, that the objection cannot be resolved, the Presidio Trust will forward all documentation relevant to the dispute to the Council, including the Presidio Trust's proposed response to the objection. Within 30 calendar days after receipt of all pertinent documentation, the Council will:

1. advise the Presidio Trust that it concurs in the Presidio Trust's proposed response, whereupon the Presidio Trust will respond to the objection accordingly; or

2. provide the Presidio Trust with recommendations pursuant to 36 CFR § 800.2(b)(2), which the Presidio Trust will take into account in reaching a final decision regarding the dispute; or

3. notify the Presidio Trust that it will comment pursuant to 36 CFR § 800.7(c) and proceed to comment on the subject in dispute.

C. Any Council comment provided in response to the Presidio Trust's request will be taken into account by the Presidio Trust in accordance with 36 CFR §800.7(c)(4) with reference only to the subject of the dispute. The Presidio Trust's responsibility to carry out all actions under this PA that are not the subject of the dispute will remain unchanged. The Presidio Trust may implement the action in dispute under this stipulation after receiving

and taking into account, pursuant to 36 CFR § 800.7(c)(4), any Council comment issued in accordance with this stipulation.

D. If the Council fails to comment within the time frame specified in this stipulation, the Presidio Trust may implement the action in dispute under this stipulation in accordance with its proposed response to the objection.

XII. AMENDMENTS AND TERMINATION

A. If any signatory believes that this PA should be amended, that signatory shall immediately consult with the other signatories for no more than 21 days to consider amendments to this PA. The signatories may agree to a longer consultation period. This PA may be amended only upon the written concurrence of all signatories. Amendments shall be executed in accordance with 36 CFR § 800.6(c).

B. This PA may be terminated unilaterally by the Presidio Trust. It may be terminated jointly by any two of the other three signatories if these two signatories determine that the terms of this PA are not being met. The signatory(ies) proposing termination shall notify all parties to this PA explaining the reasons for proposing termination. Prior to termination, the signatories shall consult for no more than 21 days to consider alternatives that would avoid termination. The signatories may agree to a longer consultation period. Should such consultation fail, the signatory(ies) proposing termination may terminate this PA by so notifying all parties to this PA in writing.

C. If this PA is terminated the Presidio Trust shall proceed in accordance with 36 CFR 800 Subpart B with regard to individual undertakings covered by this PA. If all undertakings covered by this PA have not been implemented by January 1, 2013, this PA shall terminate. The signatories may thereafter consult to develop a new agreement.

XIII. DURATION OF THE PA

Unless otherwise terminated pursuant to Stipulation XII, this PA will be in effect through the Presidio Trust's implementation of the Undertakings covered by this PA, and will terminate and have no further force or effect when the Presidio Trust, in consultation with the Council, the SHPO and NPS, determines that the terms of this PA have been fulfilled in a satisfactory manner. The Presidio Trust will provide all signatories with written notice of its determination and of termination of this PA.

XIV. INVOLVEMENT OF THE SECRETARY

The Trust shall notify the Secretary of Interior pursuant to 36 CFR 800.10 of any consultation and invite the Secretary's participation where there may be an adverse effect.

XV. PUBLIC OBJECTION

At any time, should a member of the public object in writing to the Presidio Trust regarding the manner in which the terms of this PA are being implemented, the Presidio Trust will immediately notify the other signatories in writing of the objection. The Presidio Trust shall promptly consult to address the objection with the objecting party and with any other signatory that informs the Trust within 5 days of receipt of notification it wishes to participate in the consultation. The consultation period shall last no longer than 14 calendar days. Within 14 calendar days following closure of the consultation period, the Presidio Trust will render a decision regarding the objection and notify all parties of this decision in writing. In reaching its final decision, the Presidio Trust will take into account all timely comments received from the parties regarding the objection. The Presidio Trust's final decision regarding the objection will be dispositive.

XVI. EFFECT OF THE PASSAGE OF TIME

In any case where a party fails to comment or act within a time frame that is specified herein or otherwise agreed upon by the parties, the Presidio Trust may thereafter immediately proceed in the matter at issue without further regard to comments or actions by that party.

EXECUTION AND IMPLEMENTATION of this PA evidences that the Presidio Trust has afforded the Council a reasonable opportunity to comment on the Undertakings

and their effects on historic properties, that the Presidio Trust has taken into account the effects of the Undertakings on historic properties, and that the Presidio Trust has satisfied its responsibilities for the Undertakings under Sections 106 and 110f of the National Historic Preservation Act, as amended, and applicable implementing regulations.

SIGNATORIES:

THE PRESIDIO TRUST

BY: _____

TITLE: _____

ADVISORY COUNCIL ON HISTORIC PRESERVATION

BY: _____

TITLE: _____

CALIFORNIA STATE HISTORIC PRESERVATION OFFICER

BY: _____

TITLE: _____

THE NATIONAL PARK SERVICE

GOLDEN GATE NATIONAL RECREATION AREA

BY: _____

TITLE: _____

(SIGNATURES CONTINUED ON THE NEXT PAGE)

CONCURRING PARTIES:

THE NATIONAL TRUST FOR HISTORIC PRESERVATION

BY: _____

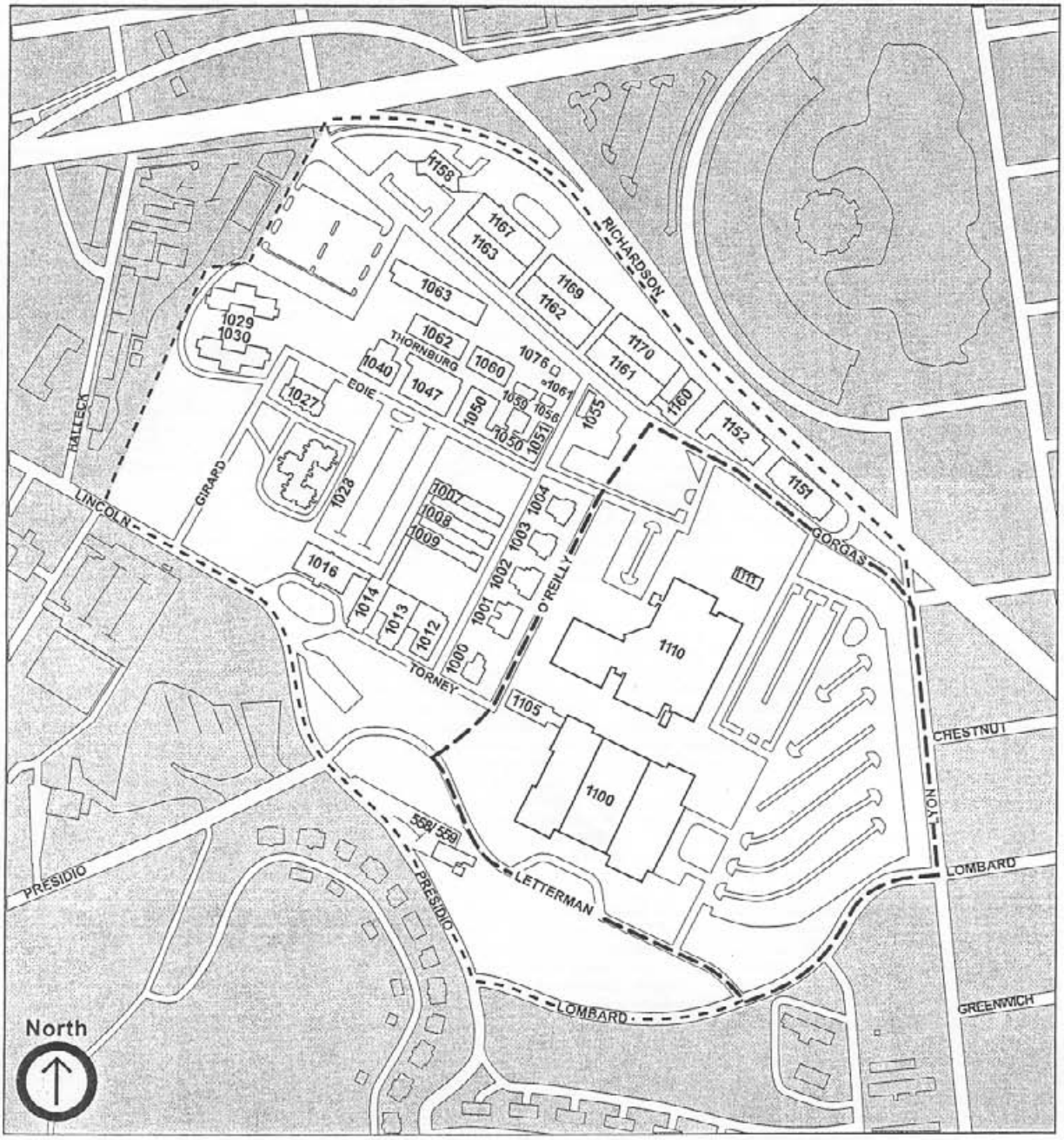
TITLE: _____

NATIONAL PARKS AND CONSERVATION ASSOCIATION

BY: _____

TITLE: _____

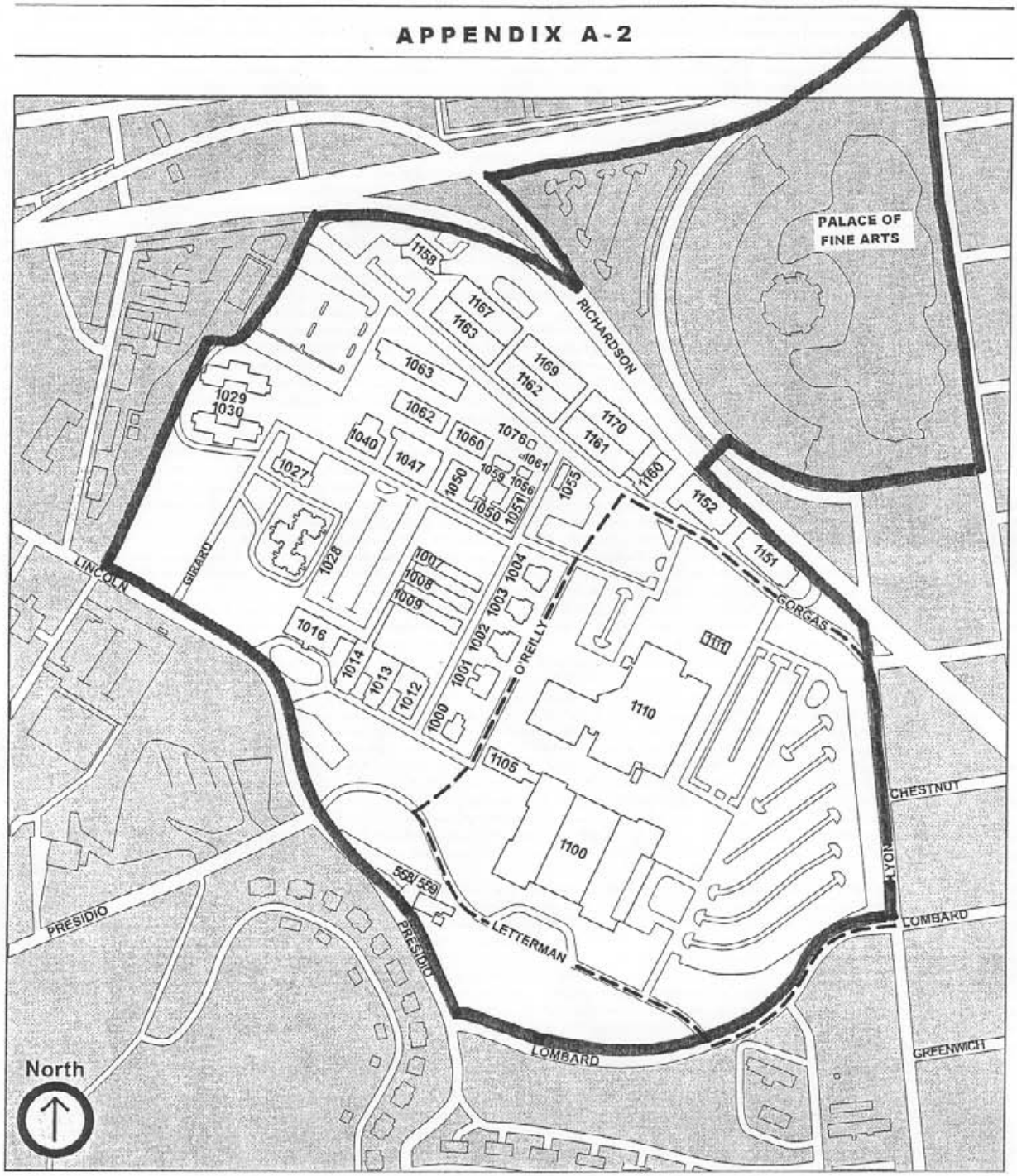
APPENDIX A-1



60-Acre Letterman Complex

23-Acre Site

Letterman Complex



Area of Potential Effect

APPENDIX B

ARCHEOLOGICAL MANAGEMENT ASSESSMENT AND MONITORING PROGRAM

Initial Archeological Management Assessment

An Archeological Management Assessment (AMA) has been conducted for the 60 acre Letterman Complex. Four archeologically sensitive zones have been identified which may contain features or sites which would either contribute to the Presidio National Historic Landmark District or be individually eligible for listing on the National Register of Historic Places. These zones are:

PAS-2: Presidio Marsh Archeological Sensitivity Area. Originally identified in the 1993 National Historic Landmark update as part of predicted zone P-2, Estuary Bluff, and revised in 1999. This is an area identified as potentially containing prehistoric sites along the edge of the bluff and the shoreline of the old marshland extending along the bay front of the Presidio and sweeping southward into the northern portions of the Letterman Complex. Historic refuse features may also exist in this zone.

PAF-30: The Presidio House.
The Presidio House was a public hostelry on the eastern boundary of the Presidio just inside and to the north of the Lombard Gate vicinity. The site may have existed in this area of the Letterman Complex between 1866 and 1915.

PAF-51: Earthquake Relief Camp 1 and Hot Meal Kitchen.
One of four relief camps established in the Presidio following the earthquake of April 18, 1906, Camp 1 contained up to 1400 people along with a central hot meal kitchen area.

PAF-56: Spring Valley Water Company Flume/Pipeline.
In operation roughly between 1857 and 1890, this water system provided water to San Francisco from Lobos Creek along the Baker Beach Bluffs through Fort Point and along the Presidio Marsh Bluffs through the Letterman Complex area.

Future Archeological Management Assessment Program

The Trust will cause to be conducted an "Archeological Management Assessment and Monitoring Program" (AMA and Monitoring Program) for all undertakings within the Letterman Complex of the Presidio of San Francisco. This will ensure that all planned undertakings will be reviewed by a qualified archeologist prior to final design. Ground disturbing maintenance activities and construction projects will be closely observed in the vicinity of sensitive archeological areas to discover, document, protect and manage the archeological record of the Presidio.

The 1993 Presidio of San Francisco National Historic Landmark District Update (Alley et al. 1993), the GOGA/PORE Archeological Overview and Assessment 2000 (Barker et al.

1999), and the Archeological Management Assessment: Letterman Complex (Barker 1999) will serve as the basis for predicting the likelihood of encountering archeological resources during ground disturbing activities at the Letterman Complex of the Presidio of San Francisco. These reports define the contextual significance of known and predicted archeological sites, while the maps indicate specific identified sites and predicted areas of archeological sensitivity.

Additional sources that will be used include:

Historic Resource Study for Spanish-Mexican Period (Langellier & Rosen 1994)
Historic Resource Study for American Period (Thompson 1997)
Archeological Resources Management Plan (Adams 1994)
Cultural Landscape Analyses
Archeological Testing and Data Recovery Reports
Archeological Monitoring Records

Given the extensive background research which went into these studies it is not considered necessary to undertake additional archival research to initiate this monitoring program. Future amendments to the park's Geographic Information System (GIS), databases, and reference documents will be used to upgrade the sensitivity areas and inventory the Letterman Complex. Nonetheless, it is recognized that limited new archival research may occasionally be required to substantiate the identification or the significance of a discovery made while monitoring, or to clarify issues for an AMA.

Development of prehistoric or historic research designs, detailed archival research, test excavation or data recovery plans to resolve adverse effects to archeological resources under 36 CFR 800.6 would not be part of the monitoring program under this Agreement, but would be considered within the archeological management assessment prepared for each undertaking within the area of the Agreement.

An annual report will be provided to all signatories with detailed summaries of all actions conducted through the AMA and Monitoring Program including the assessments conducted, monitoring results, and specialized actions to avoid adverse effects to known or discovered archeological resources.

A monitoring program similar to that proposed herein has been used on the Presidio since 1995 and has proven an efficient way of ensuring that predicted and discovered archeological resources can be documented, conserved, and given consideration while keeping significant features and sites from adverse effect. Monitoring also has provided a means of documenting minor archeological features within the Letterman Complex area like partially exposed historic infrastructure and building elements (cobblestone streets, coopered wooden drains, walls, brick foundations, surface scatters of artifacts beneath historic buildings).

Archeological Management Assessment (AMA) Process

An Archeological Management Assessment report or documentation will be completed for each undertaking with potential to impact archeological resources. To the extent possible the AMA reporting will be nested with existing Trust review processes such as NEPA (Project Review), Section 106 of the NHPA (5X), or the Dig Permit.

The AMA will examine existing archeological inventory and predicted sensitivity zones, previous monitoring or excavation work conducted in the Area of Potential Effect (APE) for the undertaking, and provide a determination if archeological monitoring of the undertaking is needed and appropriate. Each AMA will be prepared by a qualified archeologist. Comments will also include recommendations for additional actions to clarify or ensure resource identification and protection, and proposed methods of monitoring, start-of-work notification, and the schedule of the undertaking.

Additional studies separate from monitoring might be recommended in the AMA. These might include, among other actions, ground-probing, historic research, or test excavations. Such studies might result in monitoring, or they might result in undertaking redesign. The AMA is the documented process of ensuring that actions to recognize and conserve archeological resources are conducted by the Trust internally, and those undertakings which cannot avoid adverse effects can be elevated to other regulatory consultations.

Monitoring

The type of monitoring will depend upon:

a) The nature of predicted resources based on the likelihood of encountering intact structural remains or features as opposed to individual artifacts or artifact scatters that lack a meaningful contextual association.

b) The amount of previous disturbance in the immediate area which in some cases can be determined from drawings of existing utility locations

c) The type of activity taking place. For example, previous monitoring of geotechnical sampling has shown that certain types of soil extraction are more conducive to archeological examination than others due to the amount of mixing, compaction, and other factors.

Monitoring procedure for ground-disturbing activities are described below. Any cultural remains noted in the soil profiles, trench floors, or core samples will be mapped, photographed and recorded. The final record of each action will include completed monitoring, profile, and other relevant forms. Project and monitoring data will be collected and incorporated into the Golden Gate National Recreation Area Cultural GIS.

The archeological monitor will have the authority to suspend construction for sufficient time to collect, photograph, map or otherwise document any features found in wall profiles or trench floors. Should human remains or archeological features be discovered during construction, all work in the immediate vicinity will halt regardless of whether an archeological monitor is present.

All Trust issued permits, contracts, and similar approval devices, which may involve ground disturbance, shall include discovery stipulations for archeological features or sites, or human remains.

Monitoring Procedure Guidelines

1. Those areas previously disturbed or for which the likelihood of encountering intact archeological deposits is low will include examination of trench profiles or core samples by a qualified archeologist prior to backfilling.

2. Trenches, exposed areas and core samples in those areas which are not considered archeologically sensitive will be inspected using a statistical sample of not-to-exceed 10% coverage in order to verify the accuracy of the predicted sensitivity.

3. Trenches and other actions which expose areas below existing ground surface which have been previously disturbed but which still have the likelihood of providing scientific data will be monitored during the ground disturbing activity or inspected following the activity.

4. Testing of highly sensitive areas, which have not been previously disturbed will require archeological excavation test units, additional archival research, soil augering, or remote sensing prior to construction to determine whether there are undisturbed archeological deposits.

5. All archeological sites, features or isolates will be recorded on the appropriate California Historic Resources Information System (CHRIS) forms or their equivalent.

6. All artifacts will be curated by the NPS in accordance with 36 CFR 79 and the Native American Graves Protection and Repatriation Act.

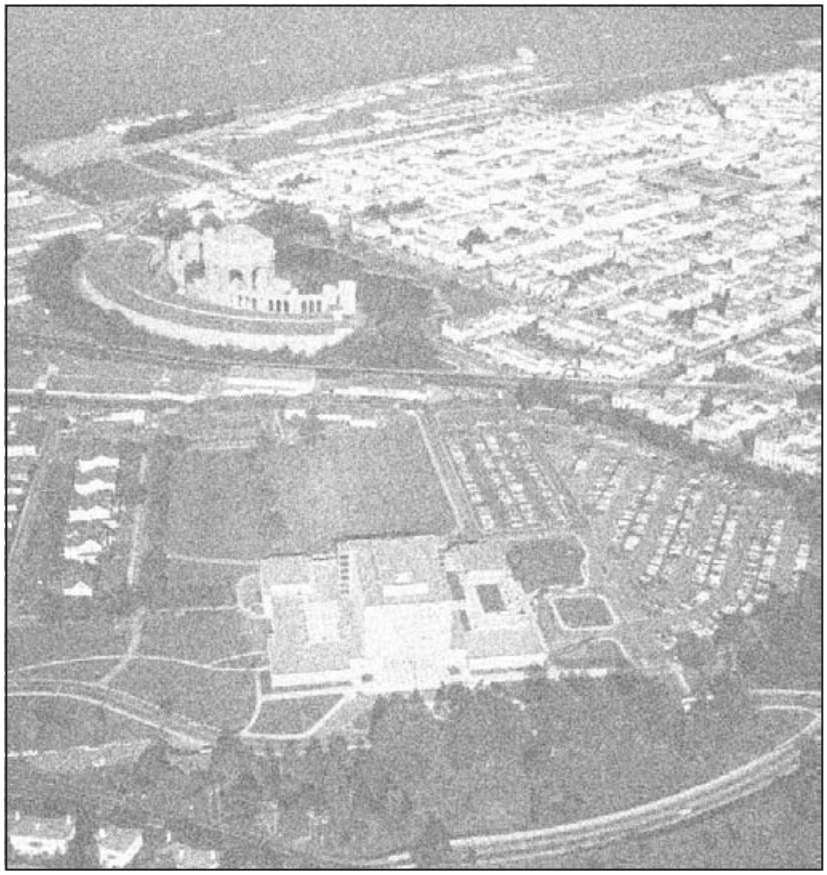
7. Copies of all archeological monitoring, testing or excavation reports will be filed with the California Information Center of the CHRIS, in addition to copies provided by the Trust to the California Office of Historic Preservation, the Advisory Council on Historic Preservation, and the Golden Gate National Recreation Area.

8. Information regarding specific archeological site locations will be subject to confidentiality requirements in order to protect the sites from vandalism or looting.

9. The Trust will comply with all provisions of the Native American Graves Protection and Repatriation Act (NAGPRA), and the Archeological Resources Protection Act (ARPA).

In the event of the discovery of Native American human remains or funerary objects, the Trust shall comply with NAGPRA regulations at 43 CFR 10.4 (Inadvertent discoveries).

G. ADDITIONAL INFORMATION ON PAST, PRESENT, AND REASONABLY FORESEEABLE FUTURE ACTIONS



G. ADDITIONAL INFORMATION ON PAST, PRESENT, AND REASONABLY FORESEEABLE FUTURE ACTIONS

This appendix provides background information on the past, present, and reasonably foreseeable future projects identified in Table 9 and referenced throughout the cumulative impact analysis in Section 4. Projects are discussed by lead agency in the order presented in Table 9.

Presidio Trust

15 HISTORIC BUILDINGS (MAIN POST)

The Presidio Trust has initiated leasing efforts for the following 15 historic buildings at the Main Post:

- *Garrison Headquarters, Building 220* – A distinguished concrete office building overlooking the Letterman Complex and Crissy Field, approximately 22,000 rentable square feet available for lease. The Trust is developing this building as a multi-tenant office facility.
- *Former Barracks and Office, Building 35* – Approximately 60,000 rentable square feet, plus a basement of 3,000 rentable square feet. This building would also be rehabilitated for office use.
- *Victorian Barracks, Building 36* – Approximately 7,000 rentable square feet. The Trust is developing this building as a multi-tenant office building.
- *Victorian-Style Office, Building 37* – Approximately 20,000 rentable square feet. This building would be rehabilitated for office use.
- *Sixth Army Headquarters, Building 38* – A concrete structure of approximately 58,000 rentable square feet. The historic building may include the following uses: offices; classrooms; small conference and meeting facilities; educational facilities; and workshops.
- *Sixth Army Headquarters, Building 39* – The building totals approximately 55,000 gross square feet. The historic building would include the following uses: offices; film production; small conference and meeting facilities; and workshops.
- *Three Connected Victorian Buildings with Distinctive Wood Siding Exteriors, Buildings 85, 86, and 87* – Approximately 18,000 rentable square feet. These buildings would be rehabilitated for office use.
- *Main Post Theater, Building 99* – The space available in this historic building totals approximately 15,000 gross square feet and may be expanded by an additional 35,000 gross square feet for theater uses for the exhibition of predominantly “independent films” and audio-visual presentations, performance art, live entertainment and conferences, and for a restaurant, retail museum and library store.
- *Presidio Chapel, Building 130* – For six decades the home to many memorable ceremonies, approximately 2,800 rentable square feet, plus a basement of 2,700 rentable square feet. The chapel would be reused for religious activities and special events.
- *Three Distinctive Former Officers Residences from the Early Days of the Presidio, Buildings 8, 9, and 10* – Approximately 3,300, 3,300, and 3,800 rentable square feet, respectively. Long-term leasing is on hold. The GMPA envisions lodging or residential use in these buildings.

- *The Presidio Officers' Club, Building 50* – A tenant is being sought to rehabilitate and operate 24,500 rentable square feet within the building for uses which may include restaurant, catering, meeting and conference, exhibit, and performance. The Officers' Club is envisioned as a special place for assembly and dining, a destination for area residents and the Presidio community, and a landmark of the Presidio's history.

These buildings were offered for leasing through three competitive leasing efforts. In March 1998, the Trust issued the Request for Qualifications (RFQ) to Lease building 39 at Historic Main Post and the RFQ to Lease building 99 at Historic Main Post. In September 1998, two more RFQs were issued: the RFQ for Multi-Tenant Space and Buildings for Lease at the Historic Main Post and the RFQ for a Unique Opportunity to Lease, Rehabilitate, and Operate the Presidio Officers' Club. The current status of these leasing efforts are that buildings 39, 220, and 36 are leased and will complete rehabilitation in the first quarter of 2000. Leasing efforts for buildings 8, 9, 10, and 50 have been suspended as qualified tenants were not identified through the RFQ process. The Trust is in the process of negotiating business terms for the other transactions. All rehabilitation work proposed for interior and exterior modifications as well as site improvements, landscaping, and code compliance must be sensitively designed to preserve the character of the property. Each building will be rehabilitated by either the Trust (buildings 36 and 220) or tenants in a manner that complies with the *Secretary of the Interior's Standards for Treatment of Historic Buildings* (NPS 1992a).

References – Request for Qualifications to Lease Building 39 at the Historic Main Post (Presidio Trust 1998g); *RFQ to Lease Building 99 at the Historic Main Post* (Presidio Trust 1998h); *RFQ for Multi-Tenant Space and Buildings for Lease at the Historic Main Post* (Presidio Trust 1998i); *RFQ for a Unique Opportunity to Lease, Rehabilitate, and Operate the Presidio Officers' Club* (Presidio Trust 1998j)

UNDERGROUND PARKING STRUCTURE (PARADE GROUNDS OR FRENCH COURT SITES AT MAIN POST)

Underground parking represents an approach to the provision of parking necessary to accommodate the needs related to the planned development of the Presidio, while addressing the objective to maximize the open space areas at the Main Post. The feasibility of constructing underground parking at the Main Post is being investigated at two candidate sites: the Parade Grounds and French Court (near the present day Burger King)[1].

Parade Grounds – The ground surface within the Parade Grounds site slopes gently towards the north, approximately at a slope of 3 percent with elevations ranging between 45 and 80 feet. The site is covered with asphalt pavement and is currently used for surface parking. A preliminary exploration program determined that the subsurface conditions at the site are generally very favorable for underground construction, particularly in view of the depth to the groundwater table. A single-level underground parking structure at the site would be approximately 510 feet by 260 feet in plan and could provide 396 parking spaces. A two-level parking garage over the same footprint would provide 706 spaces.

French Court – The French Court site is relatively flat, except for the northern portion, where the ground slopes towards the north with a drop in surface from 43 feet to 18 feet over a distance of 70 feet. The ground

[1] A third site, referred to as the YMCA site, has been rejected from further consideration because it lies within an area slated for the Tennessee Hollow creek restoration. Consequently, it was determined that the site is not appropriate for parking.

conditions at this site are also very favorable for underground construction. However, the site topography would create a situation where the north side of the parking structure would be exposed. A single level of parking at the site would provide for 411 parking spaces. The number of available spaces for two, three, and four levels of parking are estimated to be 732, 1,143, and 1,554 spaces, respectively. Given the proximity of the structure to Doyle Drive, it would be possible that in the future the structure could be directly connected to Doyle Drive.

Reference – Conceptual Engineering Evaluations and Cost Estimates for Presidio Underground Parking (Dames & Moore 1999).

PUBLIC HEALTH SERVICE HOSPITAL (PHSH) COMPLEX

The 36-acre PHSH Complex is located near the 15th Avenue entrance on the southern boundary of the Presidio of San Francisco. The complex has been designated under the Presidio GMPA as one of the "building and activity cores" where building demolition and replacement construction would occur. The PHSH Complex contains approximately 412,000 square feet of building space. Originally founded in 1875 as the U.S. Marine Hospital, today the site contains 17 existing buildings, the largest of which is the former PHSH, which totals approximately 314,000 square feet. The historic hospital building of 192,000 square feet was built in 1932. In 1952, two seven-story wings containing 122,000 square feet were added. There are seven historic residences on the site, four of which are duplexes, totaling 24,000 square feet. Nine other buildings, including dormitories and offices, total an additional 74,000 square feet. All of the residential and nine of the ten other buildings (including the original hospital building) are historic structures that contribute to the Presidio's National Historic Landmark status. The hospital was closed in 1981 and has been essentially unoccupied (except for limited, sporadic use by the Department of Defense) and not maintained since then.

The Presidio Trust expects that the historic hospital structure might be rehabilitated and the non-historic wings removed. The Presidio Trust Act (Public Law 104-333) allows demolished square footage to be replaced with an equal amount of new construction. Any proposed demolition and replacement construction would be subject to Presidio Trust design review and permitting, and compliance with Section 106 of the National Historic Preservation Act.

In response to its Request for Qualifications issued on February 19, 1999, the Presidio Trust received 16 responses for a range of uses including schools and senior assisted living. The Trust is in the process of evaluating those responses to determine which respondents would be asked to submit detailed proposals, including specific site plans, financing and anticipated tenants.

Reference – RFQ for a Unique Opportunity to Lease and Rehabilitate the Historic Public Health Service Hospital Complex (Presidio Trust 1999j).

TWO PLAYING FIELDS: MORTON STREET (EAST HOUSING AREA) AND PAUL GOODE (NORTH OF JULIUS KAHN PLAYGROUND)

Through a competitive RFQ process, the Presidio Trust leased on a short-term basis two playing fields to two schools in a program that includes access to the fields by other groups. The two fields, Morton Street Field and Paul Goode Field are located in the East Housing area. The Morton Field measures approximately 250 feet by 500 feet. The Presidio Trust upgraded the condition of the field prior to commencement of the lease.

Improvements included regrading, sod restoration, and irrigation. The Presidio Trust will maintain the field throughout the term of the lease (including regular mowing, irrigation, and daily trash removal). There is parking for approximately 20 vehicles. Flow from Tennessee Hollow is channeled under the ballfield by one drainpipe at the south end but may exit through more than one outlet at the north side of Morton Street. North and south of the field are dense stands of riparian vegetation. The area has been identified as having future restoration opportunities and may be within the alignment of the Tennessee Hollow riparian corridor. Environmental conditions have been incorporated into the project to coordinate the recreational use of the field in the short term with future restoration planning.

The Paul Goode Field measures approximately 400 feet by 420 feet. The Presidio Trust upgraded the field prior to commencement of the lease. Improvements included irrigation, regrading, installation of new fencing and dugouts, and sod restoration. The Presidio Trust will maintain the field throughout the term of the lease (including regular mowing, irrigation, and daily trash removal). There is parking for approximately 80 vehicles.

References – RFQ to Lease Playing Fields (Presidio Trust 1999b); *Revised Conditions of Approval: RFQ for Morton Street and Paul Goode Ballfields* (NPS 1999g)

PRESIDIO HOUSING (PRESIDIO-WIDE)

There are 1,116 units of housing in 21 historic and non-historic clusters in the Presidio, not including barracks and bachelor officers' quarters. The housing stock was built over a 110-year period, beginning in 1862 with the Funston Avenue residences and ending with the apartments built at Baker Beach in 1970. They are distinguishable by their geographic location within the park, the time period in which they were constructed, and the distinctive architectural features particular to each cluster. The housing consists primarily of duplexes or other multi-family buildings with two-, three-, and four-bedroom units. The 1,304 units include 1,116 single-family and multi-family units and 188 units in buildings that formerly served as barracks.

When the Trust took jurisdiction of the Presidio about 400 units were leased, mostly to the Department of Defense for military housing. Since summer 1998, the Trust has repaired and/or renovated residences in order to meet housing demand. The John Stewart Company, the Trust's residential property management agent, has been actively renting units since September 1998. A total of 770 units were occupied as of December 2, 1999. People who work full-time at the Presidio occupy nearly one-third of those residences.

The majority of the rehabilitation of the residences will be phased over an approximately five-year period. Each phase includes the rehabilitation of a specific residential cluster, or group of clusters, defined by the unit type, geographic location, and period of construction.

To date, most of the housing units have only received minor repair and maintenance work to bring them back on line to a leaseable state. Work has included replacing appliances as needed and water heaters, general landscape cleanup, roof and carport repairs, some electrical upgrades, exterior painting, and some seismic improvements, as needed to meet life/safety codes. In the future, work may address critical repairs to basic building systems based upon a physical assessment of the building, and may include seismic and structural retrofit; repair/replacement of mechanical and electrical systems; hazardous material abatement; renovation of

kitchens and bathrooms; reconfiguration of space plan; provision of access for disabled people; landscape rehabilitation; and irrigation repair/installation. Rehabilitation would demonstrate the use of energy efficient and environmentally responsible methods and materials. Key planning and architectural goals include:

- Rehabilitating and preserving the housing inventory as national and historic resources;
- Rehabilitating the units to ensure compliance with life/safety standards;
- Utilizing sound construction methods and materials that are consistent with quality management and maintenance standards;
- Utilizing green-building methods and materials that are economically feasible, environmentally responsible, energy efficient, and can be replicated;
- Providing housing to meet the demographic needs of people working at the Presidio; and
- Encouraging the development of dynamic and interactive communities within the residential neighborhoods.

The Presidio Trust's long-term goal is for all of the park's housing to be rented to people who work for organizations located in the Presidio. This program would minimize environmental and traffic impacts, and create a dynamic park community. Housing is available to full-time Presidio employees of all income levels. Until there are enough people working at the Presidio to rent all of its housing, short-term one-year leases are available to other priority groups including federal employees, college students and faculty, and the general public. People who work full-time in the park and earn a combined household income of up to $45,000 will pay no more than 40 percent of their income to live in the Presidio. To accommodate a full range of housing needs, studios and one-bedroom apartments will be made available through conversions of former barracks and dormitories. In addition, the Presidio will provide low-income housing for a veterans group, Swords to Plowshares.

Reference – Presidio Trust housing program documentation. Current leasing status.

WATER RECLAMATION PLANT (LETTERMAN COMPLEX)

The Presidio Trust's water reclamation plant would treat water from the Presidio main sewer line to supply irrigation water for park use. The Trust is in the process of soliciting preparing procurement, construction, and environmental review documents for the project. The water reclamation plant would abide by the water quality criteria, treatment processes, treatment reliability, and restrictions for use of recycled water established by the California Department of Health Services presented in Title 22, Division 4 of the California Administrative Code. Two different treatment technologies for the proposed plant are being reviewed:

1. *Membrane Filtration* – This is a relatively new wastewater treatment process that utilizes a differential pressure to draw wastewater through a membrane system. The degree of required water purity would be achieved by using different membranes in series (i.e., the tightest membranes have filtration efficiencies that can remove most salts and nitrogen compounds). After filtering through the membranes, the reclaimed water would be processed through ultraviolet disinfection and ozone for odor removal.

2. *Sequencing Batch Reactors* – This treatment technology would use a biological process for treating domestic wastewater flows. Reactors would be grouped so that fluid flow would proceed in a sequence from one to another for primary, secondary, and tertiary treatment. Aerobic digestion, which is more efficient, requires less room, and does not produce odor associated with anaerobic digestion, is being considered to process organic compounds.

The plan is for a multiple-stage project, with the first phase being the design and construction of a 200,000 gallon per day plant. Future phases will be able to treat up to 600,000 gallons per day if such a need is identified. The reclaimed water would be used for irrigation at the Letterman Complex, Crissy Field, and possibly the National Cemetery. The location of the water reclamation plant within the Letterman Complex has not been determined.

Reference – Water Reclamation Plant Planning Phase Drawing (Presidio Trust 1999h)

National Park Service

CRISSY FIELD RESTORATION

The National Park Service (NPS) and its non-profit support partner, the Golden Gate National Parks Association, are transforming Crissy Field into a waterfront park for recreation, relaxation, and education. As discussed below, when completed in the autumn of 2000, features of the new Crissy Field will include a shoreline promenade, revitalized native dunes, a 29-acre grassy meadow at the historic airfield, expanded beach, a restored 20-acre tidal marsh, scenic overlooks, family picnic areas, and a community environmental center.

East Beach – East Beach serves as the entryway to Crissy Field. A small grove of Monterey cypress trees mark the entrance near Marina Boulevard. The beach is known worldwide as a premier location for board sailing. Beach improvements will include cold-water showers outside a public restroom. A raised landform near the shore will provide a vista point for enjoying the panoramic views and checking water and wind conditions. A surfaced parking area, supplemented by large spaces of reinforced turf, will accommodate 560 automobiles.

Promenade – Mirroring the shoreline of the bay, the Promenade will serve as a site for walking, jogging, and strolling. Site improvements will provide a 20-foot-wide pathway of crushed stone flanked by benches and dunes of native plants.

Tidal Marsh – A tidal marsh once covered much of the area of present-day Crissy Field. Twenty acres of this marsh, which was filled during many years of military use, is being restored to attract bay wildlife. The shores are being hand planted with native plant seedlings that have been grown in park nurseries.

Crissy Airfield – Crissy Airfield was a vital center for the development of military aviation. The grassy airfield will be restored to its historic 1921 design. Planted with native grasses, this 29-acre open field will be available for a wide variety of unstructured recreation uses and small- to medium-sized public events.

West Bluff Picnic Area – The West Bluff Picnic Area will be a new feature of Crissy Field. Picnic tables, terraced grass landforms serving as windbreaks, and a small amphitheater/seating area will accommodate a variety of public uses. A 160-space parking lot will be screened from the user area by a grassy berm.

Crissy Field Environmental Education Center – The Crissy Field Environmental Education Center will be located in a historic building (building 603) near the marsh. The center will offer programs and activities that celebrate the diverse natural and cultural history of the park.

Restoration at Crissy Field is currently underway. Work at East Beach is nearly complete, although parking is currently limited to the asphalt sections while the grass takes root in the areas with turf parking. Construction will begin on the restroom in early 2000.

Most of the 7,000-foot promenade is now paved, providing access from East Beach to Fort Point. The alignment of Mason Street west of the Presidio commissary has been changed to incorporate the historic shape of the airfield. A two-way dedicated bicycle path will also be completed in early 2000.

The 20-acre tidal marsh is now open to the bay. The soil from this excavation is being used to restore the historic airfield and create landforms for the new picnic area west of the Coast Guard Station.

Dunes and other landforms have been sculpted and are being vegetated by volunteers. Roughly 55,000 seedlings from three native plant nurseries within the Golden Gate National Parks have been planted. Nearly 400,000 native plants in all will be used to revegetate the shoreline park.

As a condition of the National Park Service assuming jurisdiction of the Presidio, the Army was required to clean up hazardous substances remaining on the site from many years of military use. Recently, after reaching an agreement with the Army, the Presidio Trust assumed supervision over this task, which is nearly complete.

While the project is underway, limited parking is available at the East Beach. There is temporary parking near the Coast Guard Station at the west end of Crissy Field. However, this parking area will close in early 2000 to begin restoration of the airfield. The East Beach remains accessible for boardsailing.

References – Environmental Assessment for Crissy Field Plan (NPS 1996d); *Draft Master Plan for the Crissy Field Community Environmental Center* (Golden Gate National Parks Association 1999); Personal communication with Christy Rocca, Director of Programs, Crissy Field Center, Golden Gate National Parks Association, December 9, 1999.

WILLIAM PENN MOTT JR. VISITOR CENTER (BUILDING 102, MAIN POST)

NPS is planning for the seismic retrofit and rehabilitation of building 102 at the Presidio, and expansion of its current visitor center space. Building 102 is one of the historic Montgomery Street barracks. The Presidio Trust Act designated building 102 as the William Penn Mott, Jr. Visitor Center and included it as part of Area A of the Presidio, under NPS jurisdiction. The current visitor space would be expanded to cover the entire front of the first floor, including the theater at the south end. The expansion would provide 1,800 square feet for exhibits (including a prototype interactive kiosk) at the north end; a 1,800-square-foot theater and flexible

multi-purpose space; and an 800-square-foot bookstore and sales area. The two 1906 earthquake shacks from the existing Presidio Museum (currently in building 2) would be relocated to the back courtyard of building 102 and a wheelchair accessible ramp from the visitor center to the courtyard would be constructed. The planned rehabilitation would integrate the museum in building 2, which will be closed, with the visitor center. The visitor center would serve as the staging area for most Presidio interpretive tours. The rehabilitation would expand the portion of building 102 used for educational and interpretive programs on the Presidio's history by 4,500 square feet. Seismic retrofit would improve the safety of the Presidio visitor center and administrative offices, and increase the functionality and useful life of a historic structure. The design provides for seismic retrofit through installation of new concrete shear walls. Construction has already begun and is scheduled for completion in 2002.

References – Building 102 Seismic Project Description (NPS 2000a); *William Penn Mott, Jr. Visitor Center and Museum Expansion Project* (NPS 2000b); Personal communication with Michelle Rios, Architect, National Parks Service, December 20, 1999.

City and County of San Francisco

EXPLORATORIUM

The Exploratorium plans a major improvements program at the Palace of Fine Arts that would renovate part of the building's exterior and enhance and expand the building interior. The program would be completed at the end of 2002 and would contain the following components:

- The development of a new front entrance plaza for the Exploratorium and the Palace of Fine Arts at the original entrance to the Palace building at the center of the west side.
- The creation of a large skylit lobby/atrium public space on the axis between the new west entry and the Rotunda areas on the east that would provide direct public access through the building.
- The establishment of a new outdoor exploration space on the west side adjacent to the new entrance plaza. This area would contain interactive natural science exhibits that would take advantage of the natural setting. Access to and from this fenced area would be through the existing Palace building doors.
- A new café and food and beverage facility would be constructed within the Exploratorium space.
- A modification of the Palace Drive and parking area that would eliminate the 46 parallel parking spaces on the west side and displace another 47 spaces for the new entry plaza, outdoor exploration space and loading area. The Exploratorium will request approximately 150 spaces which are available in the Presidio parking area west of Richardson Drive for peak use of the Exploratorium and Palace of Fine Arts, and about 60 parking spaces under the elevated Doyle Drive. Thus, the existing 398 parking spaces would be increased to approximately 515 spaces.
- An extensive remodel of the 107,000-square-foot Exploratorium exhibit space. Approximately 20,000 square feet of new exhibit space would be added, as well as new classrooms, new store, temporary gallery, and a 250-seat theater. A new third-level mezzanine would be created to accommodate Exploratorium

offices and workshops. A balcony would be created over the former north entrance with access from the second level mezzanine.

- Improvement of the building infrastructure including an upgrade of the structural supports of the Palace building; new foundation to support the existing cement plaster walls; seismic retrofit of the support system; new heating, ventilation, and cooling systems, and upgraded electrical systems. A new drainage system that would drain the west part of the building site and prevent contaminants from entering the Palace of Fine Arts lagoon on the east side.
- The implementation of a transportation program that would minimize bus traffic in the adjacent residential neighborhood. Buses at the Exploratorium and Palace of Fine Arts events would be routed through the Presidio and Doyle Drive.

The Exploratorium currently has about 537,800 annual visitors. The expected increase in attendance would be about 71,800 visitors over the next decade for a total of approximately 609,600 visitors in 2009. A number of special events usually occur in the evenings involving a total of about 34,400 people. It is expected that these events could attract an additional 1,750 people by 2009.

References – Proposed Concepts for Renovation of Palace of Fine Arts and Additional Space in the Presidio (Exploratorium 1998); *Project Description, Exploratorium Improvement Program, Palace of Fine Arts* (Exploratorium 2000).

2361 LOMBARD STREET 126-ROOM HOTEL

The hotel project is located at 2361 Lombard Street between Scott and Pierce streets within the Marina district. It is an approximately 26,440-square-foot site that fronts Lombard Street and occupies roughly two-thirds of the Lombard Street block frontage. The site is within an NC-3 (Moderate-Scale Neighborhood Commercial) zoning district. A Preliminary Negative Declaration for the project was published on December 20, 1999. This assessment was appealed and the project is currently on hold. The project would include the proposed demolition of an existing 24-room motel (the Lanai Motel), a 4,400-square-foot restaurant (Baker's Square), an auto repair establishment (Wong's Auto Repair), and a flower stand. A new hotel would be constructed with approximately 102 to 126 hotel guest rooms. The new building would be four stories, approximately 80,152 square feet, and approximately 40 feet in height. The hotel would include ancillary facilities on the ground floor for hotel guests. Such facilities may include an exercise room, a meeting room, lounge, and breakfast room with adjoining kitchen. Between 85 and 102 parking spaces would be provided, with ingress/egress on Scott Street and on Lombard Street. One level of parking would be underground. When completed, the project would have 22 employees and 252 guests (full occupancy).

The proposed four-story building would be modulated along the front façade (Lombard Street), and a portion of the building set back from Lombard Street to form open courtyards adjacent to the main entry. Two possible ground floor (street level) plans are proposed, each with slight variations. The plan chosen will depend upon the number of parking spaces required in relation to the number of guest rooms decided upon, with the ranges noted above. The upper floor levels would also vary slightly depending on the plan chosen.

References – Preliminary Negative Declaration for 98.599E – 2361 Lombard Street 126-Room Hotel (CCSF 1999a); Personal communication with Diane Wong, Planner and Agency Contact Person, Major Environmental Analysis Section, Department of City Planning, CCSF, December 2, 1999.

1880 LOMBARD STREET RESIDENTIAL BUILDING

The City of San Francisco adopted a Negative Declaration for the project at 1880 Lombard Street, at the corner of Buchanan in the Marina district, on March 19, 1999. The project is located is located in an NC-3 (Moderate Scale, Neighborhood Commercial) zoning district in a mixed residential and commercial neighborhood. The project includes constructing a 60,600-square-foot building on a 16,500-square-foot lot. The project would include 11,000 square feet of retail at street level, 27 apartment units on the upper floors, and basement parking for 43 cars and three on-grade parking spaces. The residential component of the building would have 26 two-bedroom units and 1 one-bedroom unit on the second and third floors. The commercial use would contain one occupant. The project height would not exceed 40 feet. The building façade would be exterior stucco. The project would be constructed after the demolition of the existing 2,300-square-foot Jack-in-the-Box restaurant with drive through. When completed, the project would have 31 employees and between 54 and 60 residents.

References – Negative Declaration for 98.523E: 1880 Lombard Street Residential Building with 27 Units plus 11,000 Square Feet Commercial (CCSF 1999b); Personal communication with Alice Glasner, Planner and Agency Contact Person, Major Environmental Analysis Section, Department of City Planning, CCSF, December 8, 1999.

Golden Gate Bridge, Highway and Transportation District

ELECTRONIC TOLL COLLECTION (GOLDEN GATE BRIDGE)

The Golden Gate Bridge district is planning to install modern, state-of-the-art use of computer technology to improve toll collection, provide better convenience for customers of the Golden Gate Bridge, reduce congestion, and enhance the collection of tolls. Cars would carry transponders that would be automatically read when crossing through the toll lane. The transponder would have a pre-paid balance that would be adjusted with each crossing. The system is designed to work with all other bridges in northern California. The program would allow 1,000+ vehicles per hour through each lane during peak hours, an increase from the current average volume per lane of 550 vehicles per hour. The anticipated launch of the program is in spring 2000.

References – Golden Gate Bridge, Highway and Transportation District Electronic Toll Collection Project Revised Final Draft Strategic Plan (Golden Gate Bridge, Highway and Transportation District 1999); Personal communication with Maurice Palumbo, Principal Planner, Golden Gate Bridge, Highway and Transportation District, December 14, 1999.

San Francisco County Transportation Authority

DOYLE DRIVE RECONSTRUCTION (SAN FRANCISCO APPROACH TO GOLDEN GATE BRIDGE)

Doyle Drive is 1.5 miles long and is the southern approach of U.S. Highway 101 to the Golden Gate Bridge. It has two San Francisco approach ramps, one beginning at the intersection of Marina Boulevard and the Presidio and the other at the intersection of Richardson Avenue and the Presidio. State Route 1 (Coast Highway) merges

into Doyle Drive approximately one mile west of the Marina Boulevard approach. Built more than 60 years ago, Doyle Drive links the city of San Francisco, the Peninsula, Marin County and points north with the Golden Gate Bridge. As part of the primary north-south freeway link in coastal California, Doyle Drive carries over 144,000 weekday travelers, including public transit passengers. The purposes for replacing Doyle Drive are to significantly improve traffic conditions on the roadway and the structural and seismic safety of the roadway. Another essential purpose for replacing the roadway is to enhance the aesthetic quality of the Presidio. Traffic conditions on local roadways would also be addressed in the project.

With its narrow lanes and lack of a median or shoulders, Doyle Drive does not meet current operational standards for safety. If the structure is not replaced, structural degradation caused by age and the effects of heavy traffic and exposure to salt air, may cause the California Department of Transportation (Caltrans) to restrict multi-axle vehicles in the coming years. In addition, the eastern portion of the aging facility's location in a liquefaction zone also presents the potential for the existing structure to fail in an earthquake.

The project area includes sensitive environmental areas such as archeological sites, historically significant buildings and military batteries, endangered and sensitive plant colonies, and a national cemetery. In addition, the roadway is itself designated as historic.

In the early 1970s, Caltrans prepared plans for improving Doyle Drive. The plans were not adopted. In response to a 1991 request by Caltrans for acceptance of one or more design concepts for Doyle Drive, the San Francisco Board of Supervisors established a Doyle Drive Task Force. The concept developed through the Task Force process was for a parkway-like roadway through the Presidio. In 1993, Caltrans completed a Project Study Report, which considered the recommendations of the Doyle Drive Task Force and contained several replacement alternatives. In 1996, the San Francisco County Transportation Authority (CTA) prepared a Doyle Drive Intermodal Study, which expanded previous planning efforts.

In accordance with California Environmental Quality Act (CEQA) Guidelines and Council on Environmental Quality NEPA Regulations, the CTA is preparing a Notice of Intent/Notice of Preparation/Initial Study and conducting scoping to identify potential environmental impacts of replacing Doyle Drive in a manner that is consistent with the requirements of CEQA and NEPA. The intent is to focus future environmental studies which are expected to take the form of a joint Environmental Impact Report/Environmental Impact Statement. A number of alternatives have been considered in previous Caltrans studies and through the efforts of the Doyle Drive Task Force and in the Doyle Drive Intermodal Study. These alternatives would be reconsidered in the EIR/EIS along with other alternatives recommended through a scoping process. Alternatives to be considered in the NEPA and CEQA processes would include Transportation System Management (TSM) and transit strategies and the No-Build (or No-Project) Alternative. The roadway alternatives for this project would be primarily differentiated by their designs for access to the Presidio, Crissy Field, and the Marina district. Design options for each of these alternatives include construction staging/traffic maintenance strategies, and tunnel system and high viaduct design. The following technical issues would be considered during the evaluation of alternatives:

- Facility classification
- A transit center
- Center divider, possibly a movable barrier
- Marina/Presidio access redesign
- Parkland extensions/tunnel design
- High viaduct redesign
- Intelligent Transportation Systems (ITS) and TSM
- Direct access to the Presidio via foot, bicycle, private vehicle and public transit
- Enhanced transit, carpool and alternative commute options.

References – Request for Qualifications for Preparation of the Doyle Drive Environmental and Design Study (CTA 1999); *Doyle Drive Environmental and Design Study Initial Environmental Study* (CTA 2000).

THE PRESIDIO TRUST ACT
(as amended through March 10, 2000)

16 U.S.C. § 460bb appendix
(enacted as Title I of H.R. 4236, P.L. 104-333, 110 Stat. 4097, on November 12, 1996)
(amended by P.L. 105-83, 111 Stat. 1607, November 14, 1997)
(amended by P.L. 106-113, 113 Stat. 1501, November 29, 1999)
(amended by P.L. 106-176, 114 Stat. 23, March 10, 2000)

SEC. 101. FINDINGS.

The Congress finds that—

(1) the Presidio, located amidst the incomparable scenic splendor of the Golden Gate, is one of America's great natural historic sites;

(2) the Presidio was the oldest continuously operating military post in the Nation dating from 1776, and was designated a National Historic Landmark in 1962;

(3) preservation of the cultural and historic integrity of the Presidio for public use recognizes its significant role in the history of the United States;

(4) the Presidio, in its entirety, is a part of the Golden Gate National Recreation Area, in accordance with Public Law 92-589;

(5) 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;

(6) removal and/or replacement of some structures within the Presidio must be considered as a management option in the administration of the Presidio; and

(7) the Presidio will be managed through an innovative public/private partnership that minimizes cost to the United States Treasury and makes efficient use of private sector resources.

SEC. 102. AUTHORITY AND RESPONSIBILITY OF THE SECRETARY OF THE INTERIOR.

(a) INTERIM AUTHORITY.—The Secretary of the Interior (hereinafter in this title referred to as the ("Secretary") is authorized to manage leases in existence on the date of this Act for properties under the administrative jurisdiction of the Secretary and located at the Presidio. Upon the expiration of any such lease, the Secretary may extend such lease for a period terminating not later than 6 months after the first meeting of the Presidio Trust. The Secretary may not enter into any new leases for property at the Presidio to be transferred to the Presidio Trust under this title, however, the Secretary is authorized to enter into agreements for

use and occupancy of the Presidio properties which are assignable to the Trust and are terminable with 30 days notice. Prior to the transfer of administrative jurisdiction over any property to the Presidio Trust, and notwithstanding section 1341 of title 31 of the United States Code, the proceeds from any such lease shall be retained by the Secretary and such proceeds shall be available, without further appropriation, for the preservation, restoration, operation and maintenance, improvement, repair and related expenses incurred with respect to Presidio properties. The Secretary may adjust the rental charge on any such lease for any amounts to be expended by the lessee for preservation, maintenance, restoration, improvement, repair and related expenses with respect to properties and infrastructure within the Presidio.

(b) PUBLIC INFORMATION AND INTERPRETATION.—The Secretary shall be responsible, in cooperation with the Presidio Trust, for providing public interpretive services, visitor orientation and educational programs on all lands within the Presidio.

(c) OTHER.—Those lands and facilities within the Presidio that are not transferred to the administrative jurisdiction of the Presidio Trust shall continue to be managed by the Secretary. The Secretary and the Presidio Trust shall cooperate to ensure adequate public access to all portions of the Presidio. Any infrastructure and building improvement projects that were funded prior to the enactment of this Act shall be completed by the National Park Service.

(d) PARK SERVICE EMPLOYEES.—

(1) Any career employee of the National Park Service, employed at the Presidio at the time of the transfer of lands and facilities to the Presidio Trust, shall not be separated from the Service by reason of such transfer, unless such employee is employed by the Trust, other than on detail. Notwithstanding section 3503 of title 5, United States Code, the Trust shall have sole discretion over whether to hire any such employee or request a detail of such employee.

(2) Any career employee of the National Park Service employed at the Presidio on the date of enactment of this title shall be given priority placement for any available position within the National Park System notwithstanding any priority reemployment lists, directives, rules, regulations or other orders from the Department of the Interior, the Office of Management and Budget, or other Federal agencies.

SEC. 103. ESTABLISHMENT OF THE PRESIDIO TRUST.

(a) ESTABLISHMENT.—There is established a wholly-owned government corporation to be known as the Presidio Trust (hereinafter in this title referred to as the "Trust").

(b) TRANSFER.—

(1) Within 60 days after receipt of a request from the Trust for the transfer of any parcel within the area depicted as Area B on the map entitled "Presidio Trust Number 1", dated December 7, 1995, the Secretary shall transfer such parcel to the administrative jurisdiction of the Trust. Within 1 year after the first meeting of the Board of Directors of the Trust, the Secretary shall transfer to the Trust administrative jurisdiction over all remaining parcels within Area B. Such map shall be on file and available for public inspection in the

offices of the Trust and in the offices of the National Park Service, Department of the Interior. The Trust and the Secretary may jointly make technical and clerical revisions in the boundary depicted on such map. The Secretary shall retain jurisdiction over those portions of the building identified as number 102 as the Secretary deems essential for use as a visitor center. The Building shall be named the "William Penn Mott Visitor Center". Any parcel of land, the jurisdiction over which is transferred pursuant to this subsection, shall remain within the boundary of the Golden Gate National Recreation Area. With the consent of the Secretary, the Trust may at any time transfer to the administrative jurisdiction of the Secretary any other properties within the Presidio which are surplus to the needs of the Trust and which serve essential purposes of the Golden Gate National Recreation Area. The Trust is encouraged to transfer to the administrative jurisdiction of the Secretary open space areas which have high public use potential and are contiguous to other lands administered by the Secretary.

(2) Within 60 days after the first meeting of the Board of Directors of the Trust, the Trust and the Secretary shall determine cooperatively which records, equipment, and other personal property are deemed to be necessary for the immediate administration of the properties to be transferred, and the Secretary shall immediately transfer such personal property to the Trust. Within 1 year after the first meeting of the Board of Directors of the Trust, the Trust and the Secretary shall determine cooperatively what, if any, additional records, equipment, and other personal property used by the Secretary in the administration of the properties to be transferred should be transferred to the Trust.

(3) The Secretary shall transfer, with the transfer of administrative jurisdiction over any property, the unobligated balance of all funds appropriated to the Secretary, all leases, concessions, licenses, permits, and other agreements affecting such property.

(4) At the request of the Trust, the Secretary shall provide funds to the Trust for preparation of the program required under section 104(c) of this title, hiring of initial staff and other activities deemed by the Trust as essential to the establishment of the Trust prior to the transfer of properties to the Trust.

(c) BOARD OF DIRECTORS.—

(1) IN GENERAL.—The powers and management of the Trust shall be vested in a Board of Directors (hereinafter referred to as the "Board") consisting of the following 7 members:

(A) The Secretary of the Interior or the Secretary's designee.

(B) 6 individuals, who are not employees of the Federal Government, appointed by the President, who shall possess extensive knowledge and experience in one or more of the fields of city planning, finance, real estate development, and resource conservation. At least one of these individuals shall be a veteran of the Armed Services. At least 3 of these individuals shall reside in the San Francisco Bay Area. The President shall make the appointments referred to in this subparagraph within 90 days after

the enactment of this Act and shall ensure that the fields of city planning, finance, real estate development, and resource conservation are adequately represented. Upon establishment of the Trust, the Chairman of the Board of Directors of the Trust shall meet with the Chairman of the Energy and Natural Resources Committee of the United States Senate and the Chairman of the Resources Committee of the United States House of Representatives.

(2) TERMS.—Members of the Board appointed under paragraph (1)(B) shall each serve for a term of 4 years, except that of the members first appointed, 3 shall serve for a term of 2 years. Any vacancy in the Board shall be filled in the same manner in which the original appointment was made, and any member appointed to fill a vacancy shall serve for the remainder of the term for which his or her predecessor was appointed. No appointed member may serve more than 8 years in consecutive terms, except that upon the expiration of his or her term, an appointed member may continue to serve until his or her successor has been appointed.

(3) QUORUM.—Four members of the Board shall constitute a quorum for the conduct of business by the Board.

(4) ORGANIZATION AND COMPENSATION.—The Board shall organize itself in such a manner as it deems most appropriate to effectively carry out the authorized activities of the Trust. Board members shall serve without pay, but may be reimbursed for actual and necessary travel and subsistence expenses incurred by them in the performance of the duties of the Trust.

(5) LIABILITY OF DIRECTORS.—Members of the Board of Directors shall not be considered Federal employees by virtue of their membership on the Board, except for purposes of the Federal Tort Claims Act and the Ethics in Government Act, and the provisions of chapter 11 of title 18, United States Code.

(6) MEETINGS.—The Board shall meet at least three times per year in San Francisco and at least two of those meetings shall be open to the public. Upon a majority vote, the Board may close any other meetings to the public. The Board shall establish procedures for providing public information and opportunities for public comment regarding policy, planning, and design issues. The Board may establish procedures for providing public information and opportunities for public comment regarding policy, planning, and design issues through the Golden Gate National Recreation Area Advisory Commission.

(7) STAFF.—Notwithstanding any other provisions of law, the Trust is authorized to appoint and fix the compensation and duties and terminate the services of an executive director and such other officers and employees as it deems necessary without regard to the provisions of title 5, United States Code, or other laws related to the appointment, compensation or termination of Federal employees.

(8) NECESSARY POWERS.—The Trust shall have all necessary and proper powers for the exercise of the authorities vested in it.

(9) TAXES.—The Trust and all properties administered by the Trust and all interest created under leases, concessions, permits and other agreements associated with the properties shall be exempt from all taxes and special assessments of every kind by the State of California, and its political subdivisions, including the City and County of San Francisco.

(10) GOVERNMENT CORPORATION.—

(A) The Trust shall be treated as a wholly-owned Government corporation subject to chapter 91 of title 31, United States Code (commonly referred to as the Government Corporation Control Act). Financial statements of the Trust shall be audited annually in accordance with section 9105 of title 31 of the United States Code.

(B) At the end of each calendar year, the Trust shall submit to the Committee on Energy and Natural Resources of the United States Senate and the Committee on Resources of the House of Representatives a comprehensive and detailed report of its operations, activities, and accomplishments for the prior fiscal year. The report also shall include a section that describes in general terms the Trust's goals for the current fiscal year.

SEC. 104. DUTIES AND AUTHORITIES OF THE TRUST.

(a) OVERALL REQUIREMENTS OF THE TRUST.—The Trust shall manage the leasing, maintenance, rehabilitation, repair and improvement of property within the Presidio under its administrative jurisdiction using the authorities provided in this section, which shall be exercised in accordance with the purposes set forth in section 1 of the Act entitled "An Act to establish the Golden Gate National Recreation Area in the State of California, and for other purposes," approved October 27, 1972 (Public Law 92-589; 86 Stat. 1299; 16 U.S.C. 460bb), and in accordance with the general objectives of the General Management Plan (hereinafter referred to as the "management plan") approved for the Presidio.

(b) AUTHORITIES.—The Trust may participate in the development of programs and activities at the properties transferred to the Trust, except that the Trust shall have the authority to negotiate and enter into such agreements, leases, contracts and other arrangements with any person, firm, association, organization, corporation or governmental entity, including, without limitation, entities of Federal, State and local governments as are necessary and appropriate to carry out its authorized activities. The National Park Service or any other Federal agency is authorized to enter into agreements, leases, contracts and other arrangements with the Presidio Trust which are necessary and appropriate to carry out the purposes of this title. Any such agreement may be entered into without regard to section 321 of the Act of June 30, 1932 (40 U.S.C. 303b). The Trust may use alternative means of dispute resolution authorized under subchapter IV of chapter 5 of title 5, United States Code (5 U.S.C. 571 et seq.). The Trust shall establish procedures for lease agreements and other agreements for use and occupancy of Presidio facilities, including a requirement that in entering into such agreements the Trust shall obtain reasonable competition. The Trust may not dispose of or convey fee title to any real

property transferred to it under this title. Federal laws and regulations governing procurement by Federal agencies shall not apply to the Trust, with the exception of laws and regulations related to Federal Government contracts governing working conditions and wage rates, including the provisions of sections 276a-276a-6 of title 40, United States Code (Davis-Bacon Act), and any civil rights provisions otherwise applicable thereto. The Trust, in consultation with the Administrator of Federal Procurement Policy, shall establish and promulgate procedures applicable to the Trust's procurement of goods and services including, but not limited to, the award of contracts on the basis of contractor qualifications, price, commercially reasonable buying practices, and reasonable competition. The Trust is authorized to use funds available to the Trust to purchase insurance and for reasonable reception and representation expenses, including membership dues, business cards and business related meal expenditures.

(c) MANAGEMENT PROGRAM.—The Trust shall develop a comprehensive program for management of those lands and facilities within the Presidio which are transferred to the administrative jurisdiction of the Trust. Such program shall be designed to reduce expenditures by the National Park Service and increase revenues to the Federal Government to the maximum extent possible. In carrying out this program, the Trust shall be treated as a successor in interest to the National Park Service with respect to compliance with the National Environmental Policy Act and other environmental compliance statutes. Such program shall consist of—

(1) demolition of structures which in the opinion of the Trust, cannot be cost-effectively rehabilitated, and which are identified in the management plan for demolition,

(2) evaluation for possible demolition or replacement those buildings identified as categories 2 through 5 in the Presidio of San Francisco Historic Landmark District Historic American Buildings Survey Report, dated 1985,

(3) new construction limited to replacement of existing structures of similar size in existing areas of development, and

(4) examination of a full range of reasonable options for carrying out routine administrative and facility management programs.

The Trust shall consult with the Secretary in the preparation of this program.

(d) FINANCIAL AUTHORITIES.—(1) To augment or encourage the use of non-Federal funds to finance capital improvements on Presidio properties transferred to its jurisdiction, the Trust, in addition to its other authorities, shall have the following authorities subject to the Federal Credit Reform Act of 1990 (2 U.S.C. 661 et seq.):

(A) The authority to guarantee any lender against loss of principal or interest on any loan: *Provided*, That—

(i) the terms of the guarantee are approved by the Secretary of the Treasury;

(ii) adequate subsidy budget authority is provided in advance in appropriations Acts; and

(iii) such guarantees are structured so as to minimize potential cost to the Federal Government. No loan guarantee under this title shall cover more than 75 percent of the unpaid balance of the loan. The Trust may collect a fee sufficient to cover its costs in connection with each loan guaranteed under this title. The authority to enter into any such loan guarantee agreement shall expire at the end of 15 years after the date of enactment of this title.

(B) The authority, subject to appropriations, to make loans to the occupants of property managed by the Trust for the preservation, restoration, maintenance, or repair of such property.

(2) The Trust shall also have the authority to issue obligations to the Secretary of the Treasury, but only if the Secretary of the Treasury agrees to purchase such obligations to the extent authorized in advance in appropriations Acts. The Secretary of the Treasury is authorized to use as a public debt transaction the proceeds from the sale of any securities issued under chapter 31 of title 31, United States Code, and the purposes for which securities may be issued under such chapter are extended to include any purchase of such notes or obligations acquired by the Secretary of the Treasury under this subsection. Obligations issued under this subparagraph shall be in such forms and denominations, bearing such maturities, and subject to such terms and conditions, including a review of the creditworthiness of the loan and establishment of a repayment schedule, including a review of the creditworthiness of the loan and establishment of a repayment schedule, as may be prescribed by the Secretary of the Treasury, and shall bear interest at a rate determined by the Secretary of the Treasury, taking into consideration current market yields on outstanding marketable obligations of the United States of comparable maturities. No funds appropriated to the Trust may be used for repayment of principal or interest on, or redemption of, obligations issued under this paragraph.

(3) The aggregate amount of obligations issued under paragraph (3) of paragraph (2) of this subsection which are outstanding at any one time may not exceed $50,000,000.

(e) DONATIONS.—The Trust may solicit and accept donations of funds, property, supplies, or services from individuals, foundations, corporations, and other private or public entities for the purpose of carrying out its duties. The Trust is encouraged to maintain a liaison with the Golden Gate National Park Association.

(f) PUBLIC AGENCY.—The Trust shall be deemed to be a public agency for purposes of entering into joint exercise of powers agreements pursuant to California government code section 6500 and related provisions of that code.

(g) PROCEEDS.—Notwithstanding section 1341 of title 31 of the United States Code, all proceeds and other revenues received by the Trust shall be retained by the Trust. Those proceeds shall be available, without further appropriation, to the Trust for the administration, preservation, restoration, operation and maintenance, improvement, repair and related expenses incurred with respect to Presidio properties under its administrative jurisdiction. The Secretary of the Treasury shall invest, at the direction of the Trust, such excess moneys that the Trust determines are not required to meet current withdrawals. Such investment shall be in public debt securities with maturities suitable to the needs of the Trust and bearing interest at rates determined by the Secretary of the Treasury taking into consideration the current average yield on outstanding marketable obligations of the United States of comparable maturity.

(h) SUITS.—The Trust may sue and be sued in its own name to the same extent as the Federal Government. Litigation arising out of the activities of the Trust shall be conducted by the Attorney General; except that the Trust may retain private attorneys to provide advice and counsel. The District Court for the Northern District of California shall have exclusive jurisdiction over any suit filed against the Trust.

(i) MEMORANDUM OF AGREEMENT.—The Trust shall enter into a Memorandum of Agreement with the Secretary, acting through the Chief of the United States Park Police, for the conduct of law enforcement activities and services within those portions of the Presidio transferred to the administrative jurisdiction of the Trust.

(j) BYLAWS, RULES, AND REGULATIONS.—The Trust may adopt, amend, repeal, and enforce bylaws, rules and regulations governing the manner in which its business may be conducted and the powers vested in it may be exercised, including rules and regulations for the use and management of the property under the Trust's jurisdiction. The Trust is authorized, in consultation with the Secretary, to adopt and to enforce those rules and regulations that are applicable to the Golden Gate National Recreation Area and that may be necessary and appropriate to carry out its duties and responsibilities under this title. The Trust shall give notice of the adoption of such rules and regulations by publication in the Federal Register.

(k) DIRECT NEGOTIATIONS.—For the purpose of compliance with applicable laws and regulations concerning properties transferred to the Trust by the Secretary, the Trust shall negotiate directly with regulatory authorities.

(l) INSURANCE.—The Trust shall require that all leaseholders and contractors procure proper insurance against any loss in connection with properties under lease or contract, or the authorized activities granted in such lease or contract, as is reasonable and customary.

(m) BUILDING CODE COMPLIANCE.—The Trust shall bring all properties under its administrative jurisdiction into compliance with Federal building codes and regulations appropriate to use and occupancy within 10 years after the enactment of this title to the extent practicable.

(n) LEASING.—In managing and leasing the properties transferred to it, the Trust shall consider the extent to which prospective tenants contribute to the implementation of the general objectives of the General Management Plan for the Presidio and to the reduction of cost

to the Federal Government. The Trust shall give priority to the following categories of tenants: Tenants that enhance the financial viability of the Presidio and tenants that facilitate the cost-effective preservation of historic buildings through their reuse of such buildings.

(o) REVERSION.—If, at the expiration of fifteen years, the Trust has not accomplished the goals and objectives of the plan required in section 105(b) of this title, then all property under the administrative jurisdiction of the Trust pursuant to section 103(b) of this title shall be transferred to the Administrator of the General Services Administration to be disposed of in accordance with the procedures outlined in the Defense Authorization Act of 1990 (104 Stat. 1809), and any real property so transferred shall be deleted from the boundary of the Golden Gate National Recreation Area. In the event of such transfer, the terms and conditions of all agreements and loans regarding such lands and facilities entered into by the Trust shall be binding on any successor in interest.

(p) EXCLUSIVE RIGHTS TO NAME AND INSIGNIA.—The Trust shall have the sole and exclusive right to use the words 'Presidio Trust' and any seal, emblem, or other insignia adopted by its Board of Directors. Without express written authority of the Trust, no person may use the words 'Presidio Trust', or any combination or variation of those words alone or with other words, as the name under which that person shall do or purport to do business, for the purpose of trade, or by way of advertisement, or in any manner that may falsely suggest any connection with the Trust.

SEC. 105. LIMITATIONS ON FUNDING.

(a) **(1)** From amounts made available to the Secretary for the operation of areas within the Golden Gate National Recreational Area, not more than $25,000,000 shall be available to carry out this title in each fiscal year after the enactment of this title until the plan is submitted under subsection (b). Such sums shall remain available until expended.

(2) After the plan required in subsection (b) is submitted, and for each of the 14 fiscal years thereafter, there are authorized to be appropriated to the Trust not more than the amounts specified in such plan. Such sums shall remain available until expended. Of such sums, funds shall be available through the Trust for law enforcement activities and services to be provided by the United States Park Police at the Presidio in accordance with section 104(i) of this title.

(b) Within 1 year after the first meeting of the Board of Directors of the Trust, the Trust shall submit to Congress a plan which includes a schedule of annual decreasing federally appropriated funding that will achieve, at a minimum, self-sufficiency for the Trust within 15 complete fiscal years after such meeting of the Trust. No further funds shall be authorized for the Trust 15 years after the first meeting of the Board of Directors of the Trust.

(c) The Administrator of the General Services Administration shall provide necessary assistance, on a reimbursable basis, including detailees as necessary, to the Trust in the

formulation and submission of the annual budget request for the administration, operation, and maintenance of the Presidio.

SEC. 106. GENERAL ACCOUNTING OFFICE STUDY.

(a) Three years after the first meeting of the Board of Directors of the Trust, the General Accounting Office shall conduct an interim study of the activities of the Trust and shall report the results of the study to the Committee on Energy and Natural Resources and the Committee on Appropriations of the United States Senate, and the Committee on Resources and Committee on Appropriations of the House of Representatives. The study shall include, but shall not be limited to, details of how the Trust is meeting its obligations under this title.

(b) In consultation with the Trust, the General Accounting Office shall develop an interim schedule and plan to reduce and replace the Federal appropriations to the extent practicable for interpretive services conducted by the National Park Service, and law enforcement activities and services, fire and public safety programs conducted by the Trust.

(c) Seven years after the first meeting of the Board of Directors of the Trust, the General Accounting Office shall conduct a comprehensive study of the activities of the Trust, including the Trust's progress in meeting its obligations under this title, taking into consideration the results of the study described in subsection (a) and the implementation of plan and schedule required in subsection (b). The General Accounting Office shall report the results of the study, including any adjustments to the plan and schedule, to the Committee on Energy and Natural Resources and the Committee on Appropriations of the United States Senate, and the Committee on Resources and Committee on Appropriations of the House of Representatives.