Response to Comments

The Public Health Service Hospital
at the Presidio of San Francisco

May 2006

Response to Comments
Final Supplemental Environmental Impact Statement
Public Health Service Hospital,
The Presidio of San Francisco, CA

This document includes summaries of all substantive written and oral comments received following the release of the Draft Supplemental Environmental Impact Statement (SEIS) for the Public Health Service Hospital (PHSH), and responses to the comments. This document, together with new analysis, information, and changes made in response to comments as reflected in the accompanying revised Draft SEIS, will be filed as the Final SEIS. The Final SEIS is a supplement to and tiers from the 2002 Final EIS for the Presidio Trust Management Plan (PTMP), the Presidio Trust's (Trust) comprehensive land use plan and policy framework for Area B of the Presidio. The PTMP evaluated in the 2002 Final EIS included planning guidelines for the PHSH district.

COMMENTS ON DRAFT SEIS

A notice of the availability for the Draft SEIS was published in the Federal Register and the document was made available for public review and comment on August 27, 2004. The Federal Register announced a 45-day public comment period ending October 12, 2004, but this was extended to November 12, 2004 to ensure adequate review time. The public was invited to provide oral comment on the Draft SEIS at a Trust Board of Directors meeting on November 4, 2004, at which 125 individuals attended and 38 spoke. By the close of the public comment period, the Trust had received written and oral comments from 2 public agencies, 3 elected officials, 11 organizations, and 134 individuals, including two form letters that were submitted electronically by 30 and 27 individuals, respectively.

RESPONSES TO COMMENTS ON DRAFT SEIS

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

REVIEW PERIOD AND PUBLIC MEETING

The Trust will circulate this Final SEIS for at least 30 days before making a decision on the proposed action. **The Trust Board of Directors will hold a public meeting on June 15, 2006 beginning at 6:30 PM at the Golden Gate Club, 135 Fisher Loop in the Presidio, to introduce the proposed action.** Although there is no requirement for the Trust to respond to comments received on the Final SEIS, the Trust will consider all comments received during the 30-day time period before making a decision on the proposed action in a Record of Decision (ROD).

FOR MORE INFORMATION

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Introduction

This document includes summaries of all substantive written and oral comments received following the release of the Draft Supplemental Environmental Impact Statement (SEIS) for the Public Health Service Hospital (PHSH) in August 2004, and responses to the comments. This document, together with new analysis, information, and changes made in response to comments as reflected in the accompanying revised Draft SEIS, will be filed as the Final SEIS. The Final SEIS is a supplement to and tiers[1] from the 2002 Final EIS for the Presidio Trust Management Plan (PTMP), the Presidio Trust's comprehensive land use plan and policy framework for Area B of the Presidio. The PTMP evaluated in the 2002 Final EIS included planning guidelines for the PHSH district.

COMMENTS ON DRAFT SEIS

The Trust released the Draft SEIS for public review and comment on August 17, 2004. Notice of the availability of the Draft SEIS was provided by the U.S. Environmental Protection Agency (EPA) on August 27, 2004. On that date, the Trust widely circulated a summary of the Draft SEIS in a project update. The project update described the PHSH environmental review process, identified the alternatives analyzed in the Draft SEIS, presented its key findings, and announced where and how the Draft SEIS could be reviewed and the date and location of public hearings to comment on the document. An announcement was also provided in the September/October 2004 Presidio Post and on the Trust's website (www.presidio.gov).

The EPA's notice of availability showed the public comment period on the Draft SEIS ending on October 12, 2004. In response to several requests from commenting organizations and other parties, the Trust elected to extend this period by 30 days to November 12, 2004 (69 FR 60197). The Trust provided the longer review period to further enhance the opportunities for public and agency participation in the NEPA process. More than 150 Draft SEISs were distributed to interested agencies, organizations and individuals. The Draft SEIS was also made available for review at the Presidio Trust Library, at local libraries, and on the Presidio Trust's website.

The public was invited to provide oral comment on the Draft SEIS at a Trust Board of Directors meeting on November 4, 2004, at which 125 individuals attended and 38 spoke. By the close of the extended public comment period, the Trust had received written and oral comments from 2 public agencies, 2 elected officials, 11 organizations, and 134 individuals, including two form letters that were submitted electronically by 30 and 27 individuals, respectively (see Table 1). In general, of the approximately 230 comments received on the proposed project and Draft EIS, few expressed general support for the Trust's

[1] "Tiering" refers to the coverage of general matters in broader EISs, with subsequent narrower tiered statements or environmental analyses, incorporating, by reference, general discussions and concentrating solely on the issues specific to the statement subsequently prepared (40 CFR 1508.28). The CEQ NEPA Regulations encourage the use of tiered documents to "eliminate repetitive discussions of the same issues" (40 CFR 1502.20) and to "focus on the issues which are ripe for decision and exclude from consideration issues already decided or not yet ripe" (40 CFR 1508.28(b)). The PTMP Final EIS can be viewed at the Presidio Trust Library, 34 Graham Street, San Francisco, California or on the Trust's website at http://www.presidio.gov/Trust/Documents/EnvironmentalPlans/.

identified Preferred Alternative (Alternative 2). The vast majority of comments explicitly favored a significantly smaller development alternative (Alternative 3) that would scale down the size of the existing hospital by removing the wings and include no more than 230 housing units limited to the lower plateau of the PHSH district. No comments supported building in areas on the upper plateau of the district, including Battery Caulfield. Many of the comments raised concerns about the potential traffic and safety hazards that would be caused by the development.

Table 1. List of Public Agencies, Organizations, and Individuals Commenting on the PHSH Draft SEIS

Federal Agencies	United States Department of the Interior, National Park Service, Golden Gate National Recreation Area
	United States Department of the Interior, Office of the Secretary, Office of Environmental Policy and Compliance[a]
	United States Department of the Interior, Fish and Wildlife Service, Sacramento Fish and Wildlife Office
	United States Environmental Protection Agency, Region IX
State Agencies	Business, Transportation and Housing Agency, Department of Transportation (Caltrans)
Regional, County, and Municipal Agencies	Golden Gate Bridge Highway & Transportation District
	City and County of San Francisco
Elected Officials	Gavin Newsom, Mayor; Michela Alioto-Pier, Member, Board of Supervisors, District 2; and Jake McGoldrick, Member, Board of Supervisors District 1, City and County of San Francisco
Neighborhood Organizations	Lake Street Residents Association
	Neighborhood Associations for Presidio Planning
	Pacific Heights Residents Association
	Planning Association for the Richmond
	Richmond Presidio Neighbors
	West Presidio Neighborhood Association
Natural Resource Conservation Organizations	Golden Gate Audubon Society
	Donald S. Green, on behalf of the Sierra Club, Presidio Committee
Civic Organizations	San Francisco Bicycle Coalition
	San Francisco Planning and Urban Research Association

Individuals

Ed Alazraqui
Phyllis Ayer
David Begler
Kathleen Bole
Rob Black, Legislative Aide to Michela Alioto-Pier[b]
Michael B Brown
Kevin Castner
Peter Chernik[b]
Nicky Chiuchiarelli
V. R. Cole
Josiah Clark[b]
Karen Cleek[b]
Jean and Erich Davids (3)
Leanna M. Dawydiak & Reno L. Rapagnani
Raj & Helen Desai
J. Doremland
Stephen Dreyfuss[b]
Terry Fairman
David Fleishman
Rodney A. Fong
Muriel T. French
Joan Girardot[b]
Joanne Gomez
Mary Gould
Jon C. Gray
M. Hamrick
Winchell T. Hayward
John Helding, on behalf of Dune Ecological Restoration Team
Diane Hermann[b]
Mark Higbie[b]
Ken High, Jr. & Gail High
Bob House
Kevin Howard[b]
Eloise Jonas
Jeff Judd[b]

Sharon Kato
Ansel D. Kinney
Rich Koch
Diane Lambert-Nash
Craig Law
Jill Lawrence
Steve Ledoux[b]
Meagan Levitan
Rommie Lucia[b]
Kim Maxwell
Thomas V. Meyer
Charles Minster[b]
Rudeen Monte[b]
Margaret Moore
Richard Morales
Mikiye Nakanishi
Ward Naughton
William Newmeyer
Margot Parke[b]
Sue Peipher
Sal Portaro
Daniel Richman
David Santamaria, Founder and Advisor of Urban Planners of America
Woody Skal[b]
Dale Smith
Mary Beth Starzel
Laurie Steele
Eric N. Swagel, MD
Sharon Tsiu
Suzanne Tucker (2)
Mike Van Dyke
Jedediah Wakefield
Ann H. Weinstock
Mark Weinstock
Harold Weston
Jay P. Williams & Holly C. Holter, M.D.
Glenda Wong[b]
Edith Yamanoha
Margaret Kettunen Zegart (3)
August Zigone[b]

Form Letters

Golden Gate Audubon Armchair Activist Letter of the Month – Presidio Public Health Service Hospital Redevelopment Threatens Quail Restoration (Submitted by 30 Individuals)

Support the Position of Richmond Presidio Neighbors – Alternative 3 is the Only Alternative Compatible with the Neighborhood (Submitted by 27 Individuals)

Source: Presidio Trust 2006.

Notes:

[a]Comments submitted by the Office of Environmental Policy and Compliance are identical to those contained in the letter submitted by the National Park Service.

[b]Oral comments only.

RESPONSES TO COMMENTS ON DRAFT SEIS

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

The volume of comments received and similarity of issues raised provided both the opportunity and the necessity for grouping and summarizing like comments or comments on a similar topic in order to allow for meaningful responses. Comments were initially grouped by general topic headings and further divided into subject matter summaries. To assist reviewers, each comment topic is preceded by a short outline summarizing the subject matter within that topic. A total of 17 general topic headings and 85 subject matter summaries were used as listed in Table 2.

Table 2. Organization of Responses to Comments on the PHSH Draft SEIS

TOPIC	*SUBJECT MATTER*
General Comments	Adequacy of Information in Draft SEIS Request for Summary of PTMP EIS Significance Standards Incorporation of Previous Comments
Summary	Minimum Requirements
Purpose and Need	Request for Additional Natural Resources Protection Goal Request for Additional Neighborhood Compatibility Objective
Alternatives	Requested No Action Alternative vs. True No Action Benchmark Reconsideration of Preferred Alternative More In-Depth Comparison of Alternatives 2 and 3 Preference for Alternative 2 in Light of Project Objectives Incorporation of Park Presidio Access into the Final SEIS and the Lease Agreement Removal of Battery Caulfield Development from All Alternatives
Financial Information	Omission of Key Financial Information Failure to Consider Financial Solutions Failure to Consider and Disclose All Costs and Benefits
District-Wide Planning	Development Plans for the Entire District
Land Use, Housing and Schools	Impact on Other Planning Districts in the Presidio Residential Densities and Surrounding Neighborhoods PHSH Project as a San Francisco Residential Development Jobs/Housing Balance Senior Housing Affordable Housing Contribution to San Francisco Schools Long-Term Use of Battery Caulfield
Transportation	Blocking the 14th & 15th Avenue Gates Alternatives to Park Presidio Boulevard Access Variant Effects of Park Presidio Boulevard Access Variant on Highway 1 Traffic Operations Effect of Park Presidio Boulevard Access Variant on Pedestrian and Bicycle Safety Encroachment Permit Requested No Action Alternative Trip Generation Rates City Guidelines Neighborhood Quality of Life and Residential Level of Service (RLOS) Criteria Parking Demand Analysis Transit Trip Distribution and Assignment Impact of Transportation Policies, Including Live-Work Model Significance Criteria Expansion of Traffic Analysis Mischaracterized Existing Traffic Conditions Projected Traffic Through the 14th and 15th Avenue Gates Cut-Through Traffic Battery Caulfield Road Understated Traffic Impacts

Table 2. Organization of Responses to Comments on the PHSH Draft SEIS

TOPIC	*SUBJECT MATTER*
	Contribution to Cumulative Traffic Effects
	Cumulative Traffic Forecast Assumptions
	Impact of Additional Traffic on City Resources
	Construction Traffic Management Plan
	Variance in Construction Traffic Impacts
	Transportation Demand Management
	Transportation Demand Management Actions
	Feasibility of Mitigation Measures
	Financial Contribution to Mitigation Measures
	Transit Monitoring and Mitigation Measures
	Readability of SEIS
	Existing plus Project Analysis
	Estimated Traffic Generated by Former Hospital
	Traffic Generated by Recent PHSH District Uses
	Transit Concerns
	Clarifications and Editorial Comments
Historic Resources	Lowering of Building 1801 Wings
	Removal of Building 1801 Wings
	Demolition of Building 1801
	Interpretation of Nike Missile Facility and Marine Cemetery
Archaeological Resources	Potential Effect on Archaeological Resources
Air Quality and Noise	Estimates of Air Quality Impacts and Contaminants
	Comparison of Carbon Monoxide (CO) Emissions
	Mitigation of Construction Emissions
	Potential Impact on Point Reyes National Seashore
	Federal Standards for Fine Particulate Matter
	Characterization of Noise Levels within Alternatives 2 and 3
	General Construction/Demolition Emissions
Utilities and Services	SFFD Involvement
	New Fire Station
	Revisions to CCSF Streets
	Adequacy of CCSF Sewer System and Treatment Plant Capacities
	Water Supply and Demand
Hydrology, Wetlands and Water Quality	Impact of Mitigation Measures
Biology	Impacts on California Quail
	Prohibition on Pets
Environmental Remediation	Remediation of Contaminated Sites
	Impact on Lobos Creek from Landfill 10
Other Topics	Sustainable Technologies

Table 2. Organization of Responses to Comments on the PHSH Draft SEIS

TOPIC	*SUBJECT MATTER*
Environmental Review Process	Concurrent Negotiations with the Private Development Team Project Approvals Adhering to Local Regulations and City Involvement

Depending upon the level of public interest within a topic and its subject matter, comment summaries may encompass comments submitted by substantial numbers of commenters, or very few. Direct quotations from particular commenters are included in the comment summaries where they are helpful in communicating the essence of a group of comments. In the same instances, individual or representative commenters are often identified by name. In most cases, commenters are not identified by name in the comment summaries, and those seeking responses to comments of a particular individual or organization should consult the index of responses (Section 3) to determine their location.

Responses immediately follow each subject matter summary and have been prepared by Trust staff and consultants following review of the comment summary and the full text of the original comments. All comments have been considered and responded to equally. Their importance is not weighted by the source of the comment or any commenter characteristic. Every comment or suggestion has value, whether expressed by one or a hundred commenters, and comments have been addressed for their substance, not for their frequency.

Responses provide explanations and clarifications related to the content of the Draft SEIS. Where changes to the document have been made in response to comments, these are identified. Where questions are posed by the commenters, these are answered or acknowledged as outstanding issues. References to the SEIS, technical analyses, and other source materials are included as appropriate. Cross-referencing between responses is kept to a minimum, resulting in some repetition where the subject matter of comment summaries are similar.

ORIGINAL COMMENTS

While the comment summaries are intended to accurately reflect commenters' view and suggestions, they do not replace the comments in their original form. The original comments are available for review at the Presidio Trust Library, 34 Graham Street, in the Presidio, and constitute part of the formal public record. All comments have been made available to the Presidio Trust Board of Directors, and comments together with the entire record will be considered by the Board in making the final decision following publication of the Final SEIS.

1 Responses to Comments

1.1 GENERAL COMMENTS (GE)

GE-1. ***Adequacy of Information in Draft SEIS***

The City and County of San Francisco (CCSF), Neighborhood Association for Presidio Planning (NAPP), and others stated that the Draft SEIS is not "user friendly" and does not present information in a readily understandable format. They said it is difficult for the public to follow the logic and format of the information presented. Tables lack basic information that would allow the public to assess impacts of the project, mitigation measures are vague and unspecified, and little information is provided about many of the required environmental topics.

At the same time, the U.S. Environmental Protection Agency (EPA), which is charged with reviewing Draft EISs prepared by other federal agencies and rating them using a rating system that provides a basis upon which the EPA makes recommendations to the lead agency for improving the document, awarded the Draft EIS its highest rating (Lack of Objections or LO). The EPA suggested minor changes to the Draft EIS (specifically related to air quality impacts) and recognized the "Trust's multiple objectives as well as the effort to address prior concerns associated with the previous Environmental Assessment…"

Response GE-1 – While the Trust appreciates the opinion expressed by the CCSF in this comment, it should be noted that many reviewers of the Draft SEIS, including members of the CCSF staff, were able to use the document with sufficient ease to provide the Trust with insightful and constructive comments. These specific comments have been responded to in this Final SEIS, which also includes a number of organizational changes designed to make the information more easily accessible to even casual readers. For example:

- "Existing" transportation data have been included in the same tables as the data for each alternative in future year 2025.
- The discussion of traffic volumes through the 14th and 15th Avenue Gates has been expanded to clarify how much of the forecasted volume is associated with the project and how much is attributable to pass-through traffic. Existing traffic volumes have also been added to the table summarizing traffic volumes through the 14th and 15th Avenue Gates.
- In response to a request from the Golden Gate Bridge, Highway and Transportation District (GGBHTD), geographic distribution of trips generated by the project has been included in the Final SEIS (see Table 11).
- In response to comments from the CCSF and other reviewers, Table 12 has been added to the Final SEIS, comparing the factors considered in determining the relative significance of traffic impacts to those used by the CCSF Planning Department.

Also, where additional information was specifically requested by the CCSF or by other reviewers, this has been provided; and where specific comments or questions were posed regarding potential impacts or associated mitigation measures, these have been addressed individually in this summary of comments and responses.

GE-2. ***Request for Summary of PTMP EIS***

The CCSF commented that information from the Presidio Trust Management Plan Environmental Impact Statement (PTMP EIS) is referenced but not summarized or discussed in a meaningful way in the Draft SEIS. They said the NEPA regulations require that incorporated material be cited in the SEIS and its contents briefly described. "The reader lacks the critical information at hand to evaluate the analysis of this SEIS."

Response GE-2 – The requested Environmental Review Summary was included as Appendix A in the Trust's Request for Qualifications for the PHSH, which was made available for review by the public. In response to the comment, the Environmental Review Summary is being recirculated as part of the Final SEIS (refer to Appendix C).

GE-3. ***Significance Standards***

The CCSF stated that the Draft SEIS lacks clear standards for assessing the significance of the environmental impacts. They said it was not possible for the reader to evaluate or measure objectively against a standard the conclusions about the environmental impacts set forth in the Draft SEIS. The CCSF asked that this flaw be corrected in the Final SEIS.

Response GE-3 –The California Environmental Quality Act (CEQA) imposes somewhat different requirements, including requirements for significance thresholds, and these may be more familiar to the CCSF. In brief, while impacts are to be discussed in proportion to their significance – which the Trust believes it has done – there is no requirement under the NEPA, once the decision has been made to prepare an EIS, to establish thresholds for significance. For further discussion on this issue, refer to PTMP Final EIS, Volume II Response to Comments, pages 4-34 to 4-35 (Response EP-26, Significance Thresholds).

GE-4. ***Incorporation of Previous Comments***

Planning Association for the Richmond (PAR) noted that it previously submitted comments concerning the PHSH project, in both public testimony and in writing. PAR did not repeat these comments, but advised the Trust that it considered all previous comments to be pertinent and incorporated them in their letter by reference.

Response GE-4 – The Trust appreciates PAR's longstanding involvement in the PHSH planning and environmental review process. PAR's previous comments submitted orally and in writing before or

during the initiation of scoping for the PHSH EA and again during scoping for the Draft SEIS were responded to in Appendix A, Response to Comments, within the Draft SEIS. PAR is referred to Trust responses to comments made by CCSF representatives for those comments incorporated into PAR's letter on the Draft SEIS.

1.2 SUMMARY (SU)

SU-1. ***Minimum Requirements***

The CCSF stated that the summary should contain a discussion of areas of controversy or issues to be resolved in order to meet NEPA requirements. They said the reader must review in detail the appendices to ascertain the issues raised by reviewing agencies and the public.

Response SU-1 – In response to the comment, the CCSF is referred to a new section in the summary of the Final SEIS that identifies principal areas of controversy.

1.3 PURPOSE AND NEED (PN)

PN-1. ***Request for Additional Natural Resources Protection Goal***

The National Park Service (NPS) and the Golden Gate Audubon Society asked that the Draft SEIS include the goal of protecting and enhancing significant natural resources in the project area as a purpose of the project. "The area in and around the PHSH district is rich in biodiversity and natural assets that should be equally esteemed with the historic and cultural resources."

Response PN-1 – Protection of natural resources is a stated objective of the project (see Section 1.5.6, Purpose and Need), although it is not contained within the five-part statement of the project purpose at the start of Section 1.4. This statement focuses instead on the protection of cultural resources because the principal actions included in all alternatives involve the rehabilitation and reuse of historic buildings and associated landscapes. Nonetheless, the Trust would deem the PHSH project unsuccessful if it did not protect undeveloped areas within the PHSH district, as stated in Section 1.5.6, because these areas may shelter important plant and wildlife habitats, including that of the San Francisco lessingia, a federally listed endangered plant species.

PN-2. ***Request for Additional Neighborhood Compatibility Objective***

The CCSF asked that the Draft SEIS include as a project objective or purpose the goal of achieving compatibility with the surrounding neighborhood and balance with the existing uses in the area, and ensuring that necessary City services and infrastructure are available to serve the project. "Achievement of these objectives is necessary to ensure the success of the project and the continued livability of the surrounding neighborhoods."

Response PN-2 – The Trust has included two project objectives specifically related to compatibility with surrounding neighborhoods. Section 1.5.3 states the Trust's objective of limiting traffic and parking demand, and Section 1.5.5 states the Trust's objective of high quality site planning and design "compatible with the NHLD and surrounding neighborhoods." In addition, the Trust considers provision of adequate public services and infrastructure of the project – whether by the Trust, by the CCSF, or by private providers such as PG&E – to be a pre-requisite for project approval. Projected service levels, service providers, and related issues are described fully in Section 3.9, Utilities and Services. In addition, specific comments received regarding individual public services, perceived infrastructure deficiencies, or other related concerns have been responded to individually in this summary of comments and responses.

1.4 ALTERNATIVES (AL)

AL-1. *Requested No Action Alternative vs. True No Action Benchmark*

A number of neighborhood organizations and individuals, including NAPP, commended the Trust for adding the Requested No Action Alternative to the Draft SEIS. However, many expressed disappointment that the Requested No Action Alternative is not a true "no action" benchmark because it is not based on the present low level of activity at the site. They noted that it is instead based on October 2002, a point in time when there was traffic use by tenants such as the Jewish Community Center (JCC), Lone Mountain Children's Center and the Arion Press, making it, according to NAPP, "the busiest use in recent history." Richmond Presidio Neighbors (RPN) believed that the Requested No Action Alternative is "simply another development alternative" presumably "intended to mislead the public into believing that many of the impacts, in particular the traffic, will be no worse with Alternative 2 than with the current use." Furthermore, it appeared to RPN that the alternative assumes substantial new uses of the site, not consistent with recent uses. They believed that by overstating the amount of footage used for high intensity day care uses, the traffic generated by the Requested No Action Alternative was "grossly overestimated." NAPP wanted to see a "pragmatic" no action alternative in the Final SEIS.

Response AL-1 – The Requested No Action Alternative presented in the SEIS constitutes exactly the "pragmatic" alternative requested by NAPP in their current comments and by RPN in their comments on the PHSH EA that were responded to in the Draft SEIS. Though a NEPA "No Action" baseline is not required for the reasons explained in Response to Comment A.2.2 (PTMP vs. Existing Conditions as the No Action Alternative) in Appendix A of the Draft SEIS, the Requested No Action Alternative was included at the request of commenters. It includes uses that either currently exist on the site or uses that recently existed on the site and could be reinstituted at any time. Lone Mountain School and Arion Press are currently located at the site and constitute 4,750 square feet of high-intensity educational use and 15,100 square feet of cultural/educational use. In addition, 4,750 square feet of office space formerly occupied by the JCC are currently in use by a variety of tenants. Other space that was occupied by the JCC for classroom and other high-traffic uses is currently vacant, but could be reactivated at any time with no additional environmental analysis, since the uses would require no physical changes and fall well

within the level of activity analyzed in the PTMP SEIS. The amount of space and type of use included was derived from the JCC tenancy.

Overall types and intensities of uses included in the Requested No Action Alternative are described fully in Sections 2.2, 2.3, 3.1.2.1, 3.2.2.1, and elsewhere, and thus there is no intent to mislead. Trip generation rates related to high-intensity day care uses are discussed further in Response TR-6.

AL-2. ***Reconsideration of Preferred Alternative***

Many commenters remained "baffled" by the Trust's preference for Alternative 2 and questioned the Trust's conclusions that Alternative 2 is the "best balance" and has virtually the same impacts as other alternatives. They contended that Alternative 3 better meets the project objectives and that there is united agreement among diverse stakeholders that Alternative 3 is the best solution for the environment, the neighborhood, and the national park setting.

The NPS expressed its "strong preference" for Alternative 3. The U.S. Fish and Wildlife Service (USFWS) encouraged the Trust to adopt Alternative 3 because they believed it would result in the least potential impacts to the San Francisco lessingia, an endangered plant, compared to the other alternatives. Members of Golden Gate Audubon Society said that they greatly appreciated the Trust's past efforts to restore the California quail in the Presidio, but were "surprised and disappointed" that the Trust identified an alternative that may jeopardize the good work done in restoring quail habitat. They told the Trust it should retract its decision and instead choose Alternative 3 as the Preferred Alternative. The Sierra Club argued that the larger 350-unit housing complex under Alternative 2 would exceed the expected demand of park-based employees. "The PTMP does not provide for building new housing units in excess of the demand by park based employees and should be rejected."

RPN reiterated the Draft SEIS statement that Alternative 3 is financially feasible. They noted that the alternative satisfies the financial objective of generating $1 million in annual base rent by 2008 and generates $207 million over the 75-year lease term. Citing the Draft SEIS, they noted that Alternative 3 also requires the lowest capital outlay of $55 million. They continued: "[t]he Trust maintains that its financing goals generally are 'to obtain from each building project what the market will bear, while protecting and balancing park values.'" They offered that Alternative 3 better protects and balances park values, and better satisfies the PTMP goal as identified in the EA of "balancing the preservation of public open spaces and resources with building uses that support both the financial needs of the park and the goal of serving the public."

RPN submitted that the PHSH site could best serve the public if the Trust selects Alternative 3, which is more compatible with the surrounding neighborhood and with the sensitive habitats of national park land, and which is supported by the broader community. The Lake Street Residents Association (LSRA) echoed this position, stating that there is no financial justification for pursuing Alternative 2 when Alternative 3 provides "generous revenues without the high capital requirements and at a level of development more in scale with its surroundings as a project situated amidst a sensitive wildlife habitat and adjacent to a relatively quiet residential neighborhood." The LSRA further stated "Alternative 3

better serves the purpose of improving the overall appearance of the area" and noted that it "will have lesser traffic impacts on the surrounding neighborhood" as well as lesser impacts on local and regional air quality than Alternatives 1 and 2. "Furthermore, Alternative 3 with fewer inhabitants, a smaller footprint, and less traffic would have a lesser impact on the adjacent plant and wildlife habitats."

While RPN and most other commenters concluded their letters with a request that the Trust reconsider its stated preference for Alternative 2, this view was not unanimous. The EPA stated they were "pleased" with the selection of an alternative that would have fewer environmental impacts than the previous PTMP alternative (Alternative 1). "While Alternative 3 would offer a greater level of protection for sensitive plant and animal species and less construction emissions than the other alternatives, Alternative 2, in combination with proposed mitigation, addresses many of EPA's previous concerns regarding wetland impacts." The San Francisco Planning and Urban Research Association (SPUR) acknowledged concerns from neighboring residents regarding traffic and congestion and recognized the importance of proactively addressing these concerns. However, SPUR offered that the PHSH district represents one of the most significant opportunities to meet housing goals for the entire Presidio area, and the intensity of use outlined in Alternative 2 is consistent with the PTMP. For these reasons, SPUR "strongly supported" the intensity of use outlined in Alternative 2. Finally, the Fort Point and Presidio Historical Association stated at the public hearing held on the Draft SEIS that they have not taken a position on Alternative 2, suggesting, in the absence of additional information, that a larger project at the site could conceivably "obviate or reduce the need for infill development in the more historically sensitive areas."

Response AL-2 – A fairly universal theme of the public comments received was a request to "downsize" the proposed action. The focus was on the number of dwelling units and the potential impacts the associated tenants would have on traffic, parking, and natural resources. Responding to this request to lessen effects on the surrounding community, the Trust has extensively restructured the Preferred Alternative (Alternative 2). The Trust scaled back the maximum number of dwelling units from 350 to 230. Correspondingly, projected daily vehicle trips were reduced from 2,212 to 1,725. Additionally, the reduced number of tenants in Alternative 2 combined with the proposed underground parking garage would yield the lowest total parking demand that would be accommodated in surface parking spaces of all the action alternatives.

Since the amount of daily use has been reduced, Alternative 2 as revised also lessens potential impacts on natural resources. Alternative 2 would reduce the potential for impacts on the local quail population, wetland habitat, dune habitat (including the federally listed San Francisco lessingia), and other natural areas. Additionally, Alternative 2 addresses preservation concerns about a "hybrid of the historic structure" as the non-historic wings would be retained in their present configuration (i.e., the wings would not be lowered). Any potential issues with the larger 350-unit complex exceeding Presidio-based employee demand are also resolved with the revised 230 dwelling unit count. This lower unit count can only be financially supported with larger residential floor plans. As such, smaller/lower income units have been reduced under Alternative 2.

Alternatives 1 and 2 would produce the largest amount of revenues over a 70-year lease term. The alternatives are projected to generate $658 million – $83 million more than Alternative 3 and $144

million more than Alternative 4. Consideration for the park's financial welfare is a key element of every Trust decision. The Trust can achieve financial self-sufficiency in any number of ways, but if it does so without establishing a financial base that is strong enough to ensure the rehabilitation of the Presidio's historic buildings and landscapes, the restoration of its natural resources, and the preservation of its historic character into the infinite future, the Trust will not have accomplished its mandated purpose.

Alternative 2 would involve a greater capital outlay than Alternative 3 since a greater amount of square footage would be rehabilitated. However, Alternative 2 provides the opportunity to generate a better investment return since there is more flexibility in how the non-historic wings of Building 1801 can be modified and better residential floor plans would be available. The 1932 portion of the building is more challenging due to the requirement to preserve historic fabric. While all of the action alternatives would improve the overall appearance of the PHSH district, the selection of Alternative 2 would balance the preservation of open spaces and resources with building uses that support both the financial needs of the park and the goal of serving the public.

AL-3. ***More In-Depth Comparison of Alternatives 2 and 3***

NAPP, the Pacific Heights Residents Association (PHRA), and several individuals suggested that the SEIS should help stakeholders to understand all the trade-offs between Alternative 2 and Alternative 3. "…[W]e fail to accept that there will be no significant difference in the environmental and cultural impact of the two alternatives. …[W]e request that the Final SEIS make a more detailed and rigorous comparison of the preferred alternatives to date, Alternative 2 and Alternative 3."

Response AL-3 – The Final SEIS contains a thorough comparison of Alternatives 2 and 3, as well as comparisons with other SEIS alternatives. All of the alternatives have different impacts, as explained in each topic area. For example, Section 3.2.2.1 demonstrates that each alternative would generate a different number of automobile trips to and from the project site. There are few instances, however, where the various impacts attributed to one or more alternative would rise to a level of significance when considered objectively. In all such instances the potentially significant project-specific impacts can be effectively mitigated, usually via mitigation measures previously identified in the PTMP EIS. For example, the analysis in Section 3.2.2.2 demonstrates that only Alternative 1 and the Requested No Action Alternative would result in project-specific traffic impacts. These and other (cumulatively significant and less-than-significant) traffic impacts can be mitigated via measures identified in the PTMP EIS as modified and included in this Final SEIS.

AL-4. ***Preference for Alternative 2 in Light of Project Objectives***

A number of organizations and individuals noted that, despite the united public outcry from diverse neighborhood and environmental groups, the Trust still maintains a preference for Alternative 2. They contended that these interests share the view that the Trust has not selected the project that best "balances all of the leasing objectives or criteria" as the Trust suggests it has done, and that the Trust's previous response to these comments in the Draft SEIS is "nonsensical at best." From NAPP's vantage point, it

appeared that the impact of Alternative 2 "significantly exceeded the impact of Alternative 3 on virtually every measure." PAR believed that Alternative 3 "best meets the project objectives of preserving historic resources, limiting parking and traffic demand, promoting high-quality design and protecting important natural resources while being financially feasible."

RPN excerpted text from the Draft SEIS to demonstrate that the document itself makes the case that Alternative 3 best balances the project objectives, and stated: "[n]otwithstanding the substantial merits of Alternative 3 in terms of its lessened impact on the environment, its lower traffic and parking demand, its preservation and restoration of historic resources, and its financial viability, the Trust prefers Alternative 2 because it has the potential to generate more revenue." RPN offered that the additional revenue to be generated from Alternative 2 versus Alternative 3 is between $200,000 and $300,000 dollars, "less than 1 percent of the Trust's annual operating budget," and, "of the six leasing objectives, only the financial objective is better met by Alternative 2 and only by a small margin." RPN submitted that the financial objective should not outweigh the other five objectives that are better met with Alternative 3. "The Trust continues to fail to explain why the modest potential financial gain of Alternative 2 should trump all other considerations that favor Alternative 3." Many in the adjacent neighborhood suggested that if the revenue shortfall is only $200,000 to $300,000 per year, then the Trust should give the neighbors the opportunity to fund the difference. It appeared to many of the neighbors that the potential increase in revenue to the Trust over the life of the 75-year lease is less than two percent of the Trust's annual revenues.

Response AL-4 – The Trust's Preferred Alternative, Alternative 2, has been substantially modified since the Draft SEIS. A consistent message received through public comment was a stated preference for the selection of an alternative that reduced impacts on the environment and the neighboring community. In response to these comments, the number of proposed dwelling units in Alternative 2 has been reduced by more than 34 percent (from 350 to 230), down to the same number of dwelling units as Alternative 3. As outlined in Section 3, this reduction in the number of dwelling units results in decreased impacts on the environment.

The restructuring of Alternative 2 also increased projected revenue. Alternative 2 has a superior projected financial gain over all alternatives except Alternative 1. In comparison to the most similar alternative (Alternative 3), the additional revenue generated by Alternative 2 is currently estimated at approximately $540,000 per year. Neighborhood organizations suggested that projected revenue shortfalls could be funded by residents adjacent to the proposed PHSH site. However, Alternative 3 is only marginally economically feasible and a private developer has not been identified that would be willing to undertake Alternative 3 to date. Further, the increased financial gain from restructuring Alternative 2 makes this proposition more impractical. Assuming a five-percent rate of return, to match the projected increased revenue of Alternative 2, a financial arrangement similar to a $11 million endowment would have to be established for the duration of the lease interest.

Compared to the earlier version of Alternative 2, the Alternative 2 presented in the Final EIS has a substantially more robust financial return coupled with a reduction in the number of units and a commensurate reduction in environmental impacts. This alternative matches the expressed desire that project objectives be met in balance with one another.

AL-5. ***Incorporation of Park Presidio Access into the Final SEIS and the Lease Agreement***

A number of neighborhood groups and many individuals argued that the Park Presidio Boulevard Access Variant should be adopted as a requirement of the project rather than a variant. RPN and the San Francisco Bicycle Coalition suggested that direct access to/from Park Presidio Boulevard will significantly reduce the negative traffic impact on nearby city streets, and asserted that Park Presidio Boulevard access should therefore be a project mandate and a precondition to any of the alternatives. RPN also noted that until Caltrans has approved the Park Presidio Boulevard Access, it cannot be relied upon as a mitigation measure, and one individual suggested that Caltrans approval for the Park Presidio Boulevard intersection should be secured before the project proceeds. NAPP and others said they were pleased with the progress that is being made during meetings to discuss a new roadway to provide dedicated access to the site off of Park Presidio Boulevard. However, they believed this should be a requirement of the Final SEIS in order to mitigate the adverse impacts of the project, and not a "variant." "Dedicated access in and out of the PHSH development is a necessary part of this project… and must be included in the lease." NAPP also cited the alternative access to the Presidio defined in a mitigation measure of the Letterman Digital Arts EIS as an example.

This position was not shared by all. A member of the Park Presidio Neighbors Association and the Lake Street East Coalition cautioned that individuals in support of a new entry ramp off Park Presidio Boulevard "do not speak for all the residents in the area" and advised that efforts to create an entrance into the Presidio off of Park Presidio Boulevard would not be viewed favorably by a significant number of individuals within the neighborhood groups he represents. Another individual noted that Park Presidio Boulevard is already heavily traveled and has seen a number of fatalities, and suggested that "to direct more traffic directly onto it and also not provide a northbound entrance is ill conceived from a traffic flow and safety perspective." Still another said that the access was an unsatisfactory solution, and added that it is unlikely to be implemented by Caltrans because of lack of funding and opposition of regional Highway 1 commuters. Instead, the commenter suggested providing all access from a roadway between 14th Avenue and Park Presidio Boulevard (following the alignment of the historic access road), using bollards to block 14th and 15th Avenue Gates at the Presidio boundary and Battery Caulfield Road near Building 1451, and providing secondary access to the PHSH district via a roadway connecting Battery Caulfield Road and Pershing Drive.

Response AL-5 – The Park Presidio Boulevard Access Variant was presented as a variant in the Draft SEIS because the decision to allow the intersection ultimately lies with Caltrans. Furthermore, the Park Presidio Boulevard Access Variant does not qualify as a mitigation measure under the NEPA, as it does not improve the operation of any study intersection with a significant project-specific or cumulative effect from an unacceptable level of service to an acceptable level of service.[2] The Trust recognizes that occupancy of the PHSH district would increase traffic volumes through the 14th and 15th Avenue Gates, but considers the impact to be less than significant based on the traffic analysis presented in Section 3.2.2.

[2] The Lake Street/15th Avenue intersection does not meet Caltrans' peak hour signal warrant with Alternative 1 in the AM peak hour, and therefore the level of service (LOS) E conditions are not considered to be a significant project-specific or cumulative effect.

Several months ago, the Trust submitted initial documentation to Caltrans for exceptions to mandatory and advisory design standards, documentation of traffic accident history of the area, and a traffic signal warrants analysis. Since the initial submittal of these reports, the Trust has revised Alternative 2 (on which the submitted analyses were based) to reduce the number of dwelling units and install more restrictive traffic calming devices on the site. With these changes to Alternative 2, the daily traffic generated by the project and therefore the daily traffic that would use the Park Presidio Boulevard intersection has decreased such that the project would not meet any of the three Caltrans signal warrants for planned intersections.

Caltrans has requested additional information regarding the traffic analysis and Fact Sheets submitted in November 2004, including an updated signal warrants analysis. The Caltrans warrants analysis is included in Technical Memorandum No. 7 in Appendix B of the Final SEIS. The three Caltrans warrants applying to new intersections or intersections where it is not reasonable to count actual traffic volumes are described in Table 4C-101 from the California Supplement to the Manual on Uniform Traffic Control Devices (MUTCD), which is shown below. The warrants are based on the number of lanes on each approach of the major street (Park Presidio Boulevard) and the minor street (new access road), and whether the location is urban or rural. Because of the traffic signal phasing required for the minor street approach, the minor street would have two lanes on the eastbound approach, and Park Presidio Boulevard would have two or more lanes on each approach. Table 3 below compares the forecasted traffic volumes for the Trust's Preferred Alternative (Alternative 2) to the criteria described in Table 4C-101 from the MUTCD. Caltrans is less likely to approve the Park Presidio Boulevard access intersection if none of the three planning warrants can be met.

In response to the suggested connection between Battery Caulfield Road and Pershing Drive, this roadway connection was considered as part of one alternative in the PTMP EIS (Alternative C). While this roadway connection would offer an additional access route to and from the site, the access would not offer any advantages over the historic access points of the 14th and 15th Avenue Gates that are expected to adequately serve the site. Furthermore, a roadway with regular traffic volumes (beyond the shuttle and emergency vehicles) through this area is not consistent with adopted plans for the area, and could have the effect of transferring traffic from the vicinity of 14th/15th Avenue to the vicinity of the Presidio gate at 25th Avenue. The adopted PTMP envisions the conversion of Baker Beach Apartments into open space over time, necessitating the removal of some or all of the roadways in the area. Also, the adopted Presidio Trails and Bikeways Master Plan envisions developing a multi-use trail connecting Battery Caulfield Road to Baker Beach Apartments and Lincoln Boulevard along the alignment suggested by the commenter. This trail alignment traverses a natural area within the USFWS Recovery Area for San Francisco lessingia. Its conversion to constant motor vehicle access (as opposed to emergency or more infrequent access) would be inconsistent with the Presidio's plan and could affect recovery goals for the lessingia.

Table 3. Traffic Signal Warrants Analysis for Park Presidio Boulevard Access Variant

Warrant	Minimum Estimated Average Daily Traffic			
	Vehicles Per Day on Major Street (Total of Both Approaches)		Vehicles per Day on Higher-Volume Minor Street Approach (One Direction Only)	
	Requirement	Alternative 2	Requirement	Alternative 2
Warrant 1A – Minimum Vehicular Traffic	9,600	84,500	3,200	1,100
Warrant 1B – Interruption of Continuous Traffic	14,400	84,500	1,600	1,100
80% of Values for Warrants 1A & 1B[a]				
Warrant 1A	7,680	84,500	2,560	1,100
Warrant 1B	11,520	84,500	1,280	1,100

[a] Neither Warrant 1A nor Warrant 1B satisfied, but both warrants fulfilled 80% or more.
Source: Wilbur Smith Associates 2006e.

Table 4C-101. Traffic Signal Warrants Worksheet (Average Traffic Estimate Form)

(Based on Estimated Average Daily Traffic - See Note)

URBAN..... RURAL.....	Minimum Requirements EADT	
1A - Minimum Vehicular Traffic	Vehicles Per Day on Major Street (Total of Both Approaches)	Vehicles Per Day on Higher-Volume Minor Street Approach (One Direction Only)
Satisfied _____ Not Satisfied _____		
Number of lanes for moving traffic on each approach	Urban / Rural	Urban / Rural
Major Street / Minor Street		
1 / 1	8,000 / 5,600	2,400 / 1,680
2 or More / 1	9,600 / 6,720	2,400 / 1,680
2 or More / 2 or More	9,600 / 6,720	3,200 / 2,240
1 / 2 or More	8,000 / 5,600	3,200 / 2,240
1B - Interruption of Continuos Traffic	Vehicles Per Day on Major Street (Total of Both Approaches)	Vehicles Per Day on Higher-Volume Minor Street Approach (One Direction Only)
Satisfied _____ Not Satisfied _____		
Number of lanes for moving traffic on each approach	Urban / Rural	Urban / Rural
Major Street / Minor Street		
1 / 1	12,000 / 8,400	1,200 / 850
2 or More / 1	14,400 / 10,080	1,200 / 850
2 or More / 2 or More	14,400 / 10,080	1,600 / 1,120
1 / 2 or More	12,000 / 8,400	1,600 / 1,120
1A&B - Combinations		
Satisfied _____ Not Satisfied _____	2 Warrants	2 Warrants
No one warrant satisfied, but following warrants fulfilled 80% or more..... _____ (1) _____ (2)		

Note: To be used only for NEW INTERSECTIONS or other locations where it is not reasonable to count actual traffic volumes.

AL-6. *Removal of Battery Caulfield Development from All Alternatives*

The Dune Ecological Restoration Team and several individuals opposed any residential development at the Battery Caulfield site and urged that it be removed from the PHSH planning district in all alternatives. They felt the site should be left as a maintenance yard until such time as funds became available to restore the area to native habitat. A similar view shared by others could be summarized by one individual: "[t]he fact that residential development plus parking at the Battery Caulfield site is still included in Alternative 2

leads me to conclude that the Trust does not place much value on the natural resources in the… district." Another individual was concerned that new development at the site would increase traffic, causing more circulation problems.

Response AL-6 – The Trust would be remiss to remove reasonable alternatives from study in light of the NEPA's goals and policies. For a discussion of the reasons for including an analysis of residential development at the Battery Caulfield site in the SEIS, refer to Section 2.9.6 (No Development at Battery Caulfield…) on page 67 and Section A.1.3 (Elimination of the Battery Caulfield Alternative) on page A-4 of the Draft SEIS.

1.5 FINANCIAL INFORMATION (FI)

FI-1. *Omission of Key Financial Information*

RPN and many individuals argued that the Draft SEIS lacks a full economic assessment of the alternatives. RPN asserted that the "failure to provide such pivotal financial information is a critical flaw in the DSEIS." They stated: "Without a specific financial plan for the PHSH site or any detailed explanation of the Trust's financial needs (other than the $1 million minimum ground rent each of the alternatives will generate), the public cannot know how well each of the alternatives will further the Trust's financial plan for the Presidio, including the preferred alternative." RPN claimed that the Draft SEIS lacks anything other than a "very simplified, superficial" financial analysis of the development alternatives." They asked that the Trust "disclose with much greater particularity its financial needs and goals relating to the PHSH site." They claimed that for the public to weigh the economic benefit, the Trust must set forth capital costs, source of capital, revenue, and operation and maintenance costs. Furthermore, the Trust should express the PHSH financial goal in the context of the Trust's overall financial projections to show why Alternative 2 is necessary to achieve self-sufficiency.

One individual said he was confused about how the Trust could prefer Alternative 2 over Alternative 3 when the initial cost of Alternative 3 would be far less, and when the return on investment is estimated to be the same. He added: "Can the Trust adequately justify the millions of dollars up front expenditure to its political bean counters in Washington?" Another individual at the public hearing held on the Draft SEIS posed that the "larger operational risk" associated with Alternative 2, when viewed against such factors as the "good will of the neighborhood, the traffic, and just the beautification of the place," would suggest that Alternative 3 would be "safer" than Alternative 2, taking into account the "risk-adjusted return." Almost all commenters raising this issue requested that the Trust disclose fuller financial information relevant to its development choice and circulate it for public comment before a final decision is made.

Response FI-1 – The Trust welcomes the comment and understands commenters' interest in the financial analysis of the alternatives. While in no way required under the NEPA, the Trust has provided the requested additional financial information to update and supplement the financial analysis prepared for the Draft SEIS (see Appendix A of the Final SEIS). The current analysis incorporates the Draft-to-Final SEIS reduction in Alternative 2's dwelling unit count from 350 to 230.

Highlights of the analysis include the following:

- Alternative 3 is, at best, marginally feasible as a rental project because it would not generate a sufficient return to induce a developer to undertake the project. The primary reason is that dwelling units located in the non-historic wings of Building 1801, as in Alternative 2 can be larger and would feature impressive city and ocean views, thus generating substantially greater rents than those that would be located in the historic core of Building 1801. The loss of units located in the non-historic wings, as in Alternative 3, would mean the loss of many economies of scale, both in the development and operation of the project. The financial analysis in Appendix A suggests that, due to the costs of the overall project, reuse of the historic portion of Building 1801 for rental housing without the square footage contained in the non-historic wings would be difficult to carry out.

- The financial performance of Alternative 2, specifically the revenue to the Trust, is substantially better that that of Alternative 3. For example, the net present value of Alternative 2 is worth $38.0 million compared to $27.9 million for Alternative 3.

- The analysis includes a description of anticipated financing sources. All alternatives feature substantial capital investment by the Trust in PHSH buildings other than Building 1801.

- The risks associated with the different alternatives have been factored into the analysis through the use of different discount rates for the higher risks associated with Alternatives 1 and 4.[3]

Some commenters suggested that the Trust needed to provide financial context to demonstrate why Alternative 2 is necessary in order for the Trust to achieve financial self-sufficiency. Some perspective on the Trust's overall financial challenges is provided below, but it is important to note that the Trust need not demonstrate, and has not asserted, that financial self-sufficiency can only be achieved by pursuing Alternative 2. The PHSH complex represents a significant source of revenue for the Trust; the complex represents approximately seven percent of the 5.6 million square feet anticipated under the PTMP. When the project is stabilized, it is expected to generate approximately five percent of the Trust's revenue from operations. (For comparison purposes, with the exception of Letterman Digital Arts, no single current tenant is expected to generate more than one percent of the Trust's total revenue from operations.) The PHSH complex revenue is thus an important component of the Presidio's long-term revenue stream.

Because the Trust has a restricted number of opportunities to generate revenue, the financial performance of each project, although balanced with other objectives, is critical. The Trust Act limits the amount of building square footage in the park to 5.96 million, or the amount built by the Army before it departed in 1994. The Trust has also committed in the PTMP to reduce that amount to 5.6 million square feet in order to further open space objectives, such as creating wildlife corridors, restoring natural areas, and enhancing opportunities for public use. Over two-thirds of the Presidio's building square footage has already been

[3] Alternative 1 would require the Trust to locate, and rely on, a very few number of institutional tenants. Alternative 4 would involve the development of senior housing, which shrinks the pool of prospective tenants to those meeting applicable age restrictions, making it somewhat more risky.

rehabilitated or redeveloped; most of this square footage can be accounted for in housing and the Letterman Digital Arts Center. Many of the remaining opportunities for generating revenue are complicated and expensive historic preservation projects.

Because of the Trust's singular purpose to preserve and protect the park, the Trust has few opportunities to diversify its revenue sources. To date, the Trust has had only two significant revenue sources: federal appropriations and operating revenues (primarily rent). The former has steadily declined and is projected to do so each year before appropriations are eliminated in 2013.[4] Similarly, the Trust's opportunities for revenue generation are almost completely limited to the Presidio's buildings. The Trust thus has significant exposure to changes in the local and national real estate and construction markets.[5]

It is against this backdrop of declining federal appropriations, rising construction costs, limited revenue-generating opportunities, and exposure to the notably cyclical real estate market that the Trust must balance financial considerations with other values. These other values include those identified by commenters (beautification, traffic impacts, and neighborhood harmony) as well as many others that are critical to the Trust's mission. The Trust balances these values with its financial imperatives to the greatest extent possible.

Thus, the Trust's redevelopment approach is both prudent and flexible. Financial performance is judged in balance with other objectives, projects that generate revenue offset those that do not, and the revenue generated is dedicated to operating and maintaining the Presidio in perpetuity. The decisions that the Trust has made to advance the PHSH project have been consistent with this approach and have also been responsive to citizens' concerns about the Presidio's resources, their questions about the economic security of the Presidio, and their apprehension about the impacts of the project on the surrounding areas.

FI-2. *Failure to Consider Alternative Financial Solutions*

RPN and various individuals argued that the Trust cannot discharge its obligations to the public without considering potential creative financial solutions that could eliminate the need for maximizing the build-out at the PHSH. RPN pointed out that the National Academy of Public Administration concluded that a greater use of federal financing could substantially reduce the Trust's financing costs. RPN, NAPP, and others urged the Trust to consider using alternative funding mechanisms to increase the returns on a smaller build-out (and possibly no build-out) of the hospital. They asserted that the Draft SEIS "fails to address efforts to obtain alternative financing or other sources of funding" for building rehabilitation such as 1) retaining the Wherry Housing for an additional 5 to 10 years to raise additional capital and reduce the financial pressures on the PHSH site, and 2) seeking funding to rehabilitate a portion of the buildings itself in order to reduce the scope of the project and maximize revenue return to the Trust. Various

[4] In Fiscal Year 2006, federal appropriations amounted to approximately $20 million, and they will decline to zero by 2013. It is important to note that the Presidio's annual appropriation is not guaranteed, nor is the rate of decline pre-set; it can decline more rapidly in response to competing financial priorities in the federal government.

[5] Both rents and construction costs can be volatile. From 2001 to 2003, average asking rents for San Francisco County office space dropped by almost 35 percent (NAI BT Commercial 2005). Similarly, by one measure, construction costs grew by nearly ten percent in 2005 alone (Turner Construction Company 2006).

neighbors volunteered at the public hearing held on the Draft SEIS that they would help the Trust "make up the shortfall in some way or another." To quote one individual: "I know of giving circles in small towns in the Midwest that raise a million dollars a year. I think that San Francisco can do better."

The LSRA submitted that an alternative financing approach is available for the Trust that would generate as much revenue from a much smaller project and allow the Trust to maintain greater control over the outcome. "That is, the Trust could obtain a higher revenue yield from a less intense usage with far less adverse environmental consequences if it provided more core funding of this project and approached it as a joint-venture with a private developer, instead of handing the site over to a private developer to capitalize the developers return on this valuable, habitat-sensitive site."

RPN commented that the Trust misconstrued a request to analyze an additional alternative: leasing only Building 1801 to a private developer for rehabilitation (requiring removal of the wings) while the Trust serves as the developer for all other PHSH district buildings. RPN urged the Trust to seek funding to rehabilitate a portion of the buildings itself in order to reduce the scope of the project and maximize revenue return to the Trust. They claimed if the Trust rehabilitates the Wyman Avenue residences itself, this $400,000 in revenue together with $600,000 from the JCC, Arion Press, and Lone Mountain School leases would allow for smaller or no Building 1801 build-out.

Response FI-2 – The essence of the comment is that the Presidio Trust's environmental analysis is deficient because it has not fully analyzed smaller project alternatives that might result from one or more suggested financing approaches. Underlying the comment is a belief that the Preferred Alternative would "maximize build-out" at the PHSH. Both assertions are incorrect.

First, the Preferred Alternative does not "maximize build-out" at the PHSH. In connection with the adoption of the PTMP, in 2002 the Trust analyzed the environmental impacts of a number of alternative management plans in the PTMP EIS. The Preferred Alternative under this SEIS is less intensive than the use that was adopted under the PTMP, i.e., the use that could have been pursued without preparing a supplemental EIS.

Second, the project alternatives suggested by the commenters as likely to result from the recommended financial solutions fall within the range of the alternatives already analyzed. For example, if a financial approach (whether retaining Baker Beach housing or seeking donations from neighborhood groups) would make it possible for the Trust to adopt an alternative that eliminated the hospital's non-historic wings, the result would be implementation of Alternative 3. Going further, if a financial approach such as the retention of Baker Beach Apartments were used as justification for not undertaking the PHSH project, the result would be implementation of the Requested No Action Alternative. However, under such a scenario and under any scenario that would demolish the historic buildings at the PHSH site, the Trust's stated purpose and need for the PHSH project would not be fulfilled.

The range of alternatives considered in both the Draft and Final SEIS include everything from "do nothing" (the Requested No Action Alternative) to full build-out under the adopted management plan (the PTMP Alternative). Because the projects that could result from one or more of the suggested financial

approaches would fall within the range of alternatives already analyzed, the Trust has fully discharged its obligation under the NEPA to consider a reasonable range of alternatives that could accomplish the agency's statement of purpose and need. The Trust thus could proceed with the adoption of the Preferred Alternative as described in the Draft SEIS (i.e., a 350-unit project).

Despite the adequacy of the SEIS alternatives, and despite the fact that the 350-unit alternative would have been less intensive than the use already approved in the PTMP (which was subject to extensive public comment and environmental analysis), the Trust has reduced the unit count in its Preferred Alternative. The Trust's revised Alternative 2 includes only 230 dwelling units, which is identical to Alternative 3.

Finally, the Trust has been creative in evaluating potential approaches to project financing. The Trust has always anticipated the need for philanthropy to complete the capital investments required to make the Presidio a great national park, and is actively pursuing philanthropic funding. Further, the Trust does invest its own funds in projects, sometimes to retain control and/or enhance financial returns. Indeed, the Trust expects to invest its own funds in rehabilitating the Wyman Terrace homes and the ancillary hospital buildings in the PHSH district. In many cases, however, the Trust invests its own capital in projects because there simply is no other source. For example, it is difficult to generate either investment or philanthropic interest in financing sewer or other infrastructure improvements. The many demands on the Trust's scarce capital require that the Trust be cautious in deciding where its limited capital is best deployed, and that it balance financial and non-financial objectives carefully.

FI-3. ***Failure to Consider and Disclose All Costs and Benefits***

RPN criticized the Trust's financial analysis in the Draft SEIS as oversimplified insufficient disclosure because "the cost and benefits to the Trust as opposed to the private developer is not delineated" and the costs of maintaining and administering the project alternatives (fire, police, grounds, maintenance, administration, mitigations) are not discussed. In other words, the Draft SEIS did not disclose revenue "contribution after cost."

Response FI-3 – The financial analysis in Appendix A of the Final SEIS provides information about potential returns to a developer under the alternatives. The analysis allows a comparison among the SEIS alternatives, and the terms (both for a developer and for the Trust) reflect reasonable cost and revenue assumptions for each alternative. Returns would normally be expected to vary among different developers depending on the transaction structure (including particularly the cost to the developer of obtaining project financing) and many other variables including the cost and duration of construction, as well as trends in rents, operating costs, local employment and the broader economy.

The focus of the SEIS is properly on the potential impacts of the different alternatives on the Presidio and the Trust. Potential developer returns are of limited utility in the SEIS analysis except to the extent that they provide information that may be useful in assessing feasibility; i.e., whether a particular alternative would generate sufficient revenue to cause a developer to undertake the project.

The financial analysis in Appendix A of the Final SEIS provides a realistic view of the costs associated with the PHSH project, including anticipated initial development costs. The Trust expects that leases (for non-residential buildings) would be structured as "triple net" leases under which the tenant is typically responsible for many of the building's operating costs. For a long-term lease, it is normal to shift virtually all operational costs to the tenant.

Many of the costs associated with the project would typically be borne either by the developer (e.g., upgrading utility systems within buildings and leased areas) or by all tenants through the Service District Charge (SDC). The Trust uses the SDC mechanism to recover costs associated with providing municipal-like services such as road and sidewalk maintenance and police and fire services.

Finally, while virtually all operating costs are expected to be borne by the developer or through the SDC (to the extent any are borne by the Trust), there is no reason to expect a material difference in operating costs among the alternatives (other than the Requested No Action Alternative). Thus, while operational costs would generally be expected to increase with the reactivation of the district under any of the alternatives other than the Requested No Action Alternative, Alternatives 1 through 4 are not expected to have material differences (if any differences) in costs not covered either by the developer or through the Trust's SDC.

1.6 DISTRICT-WIDE PLANNING (DP)

DP-1. ***Development Plans for the Entire District***

RPN and NAPP stated that the Draft SEIS does not analyze alternatives that encompass district-wide planning. "While the PTMP considered the PHSH site as a 42-acre whole, the Draft SEIS, despite some allusions to the entirety of the site, is really only a development plan for the 18 acre Lower Plateau, featuring more dwelling units than was contemplated under the PTMP." They maintained that by not engaging in district-wide planning, the Trust may be reserving its right ("leaving the door open") to engage in new construction on the upper plateau in the future. They viewed the Trust as positioning the district for maximum flexibility, and asserted that "we cannot know what the PHSH district will become and thus cannot effectively evaluate the alternatives presented." And, "[w]ithout a district-wide approach, the cumulative impacts of revitalizing the PHSH district are understated and the environmental analysis is incomplete." The LSRA and the PHRA concurred, offering that, without district-wide planning, the cumulative adverse impacts of the entire site on both the adjacent neighborhoods and on park land would be underplayed.

Response DP-1 – The commenters' earlier requests for a district-wide plan were responded to in Appendix A, Section A.1.5 (District-Wide Plan Alternatives) of the Draft SEIS (page A-5 and elsewhere) and are repeated and expanded upon here.

The currently proposed project involves reuse of buildings within the PHSH district and includes alternatives that would rehabilitate and reuse buildings on the upper and lower plateaus. In addition, one

of the alternatives would remove buildings on the lower plateau and replace them with new construction on the upper plateau. (This is not the Preferred Alternative.) The scope of actions for decision under this SEIS is the extent and configuration of building development and building-related landscape changes within the project site. This SEIS is not being relied upon to make site-specific decisions about all future resource management or about open spaces within the entire PHSH district, and the project site has been defined to encompass only previously developed areas potentially suitable for building development and associated landscapes.

The process of reviewing smaller projects within the context of a larger development plan ("tiering") is expressly contemplated under the NEPA and is a proper method of reviewing impacts over time, from various projects, for a large, complex site such as the Presidio. The fact that the PTMP EIS considered the 42-acre site as a whole does not mandate that a later, site-specific analysis of proposed development at the PHSH consider a larger site than is proposed. The nature of tiering allows the programmatic document to review impacts over a large area, and the site-specific document to evaluate a smaller area (while still including the necessary analyses of cumulative and indirect impacts).

The PTMP sets the parameters for development within the PHSH district, and each of the SEIS alternatives (except the Requested No Action Alternative) would implement the Plan in a different way. In alternatives with more than the 210 dwelling units included in PTMP, there would be a commensurate reduction in the amount of educational space that the Plan assumed within the PHSH district, and a reduction in the number of dwelling units allowed elsewhere in the Presidio (because of a Presidio-wide limit on the number of units). In alternatives with less square footage than the maximum of 400,000 established by the Plan, there would be "leftover" square footage that could theoretically be used within the district at a later date, as suggested by the commenters. There are two factors that make later use of "leftover" square footage in the district highly unlikely. First, the district is small (42 acres total) and the majority of the upper plateau is designated to remain as open space due to the presence of endangered species and important habitats. Second, the analysis and conclusions contained in this SEIS suggest that new construction within previously developed areas (i.e., principally the Battery Caulfield site) would be difficult and expensive, due to extensive mitigation measures required to avoid significant environmental impacts.

The cumulative effects of up to 400,000 square feet of occupied space within the PHSH district, combined with build-out of all other planning districts in the Presidio, was fully analyzed in the PTMP SEIS, and can be understood by reviewing environmental consequences associated with Alternative 1 in this SEIS. Any "leftover" square footage within the PHSH district could not readily be relocated to another district of the Presidio under the PTMP, because each of the other planning districts also contains a maximum amount of square footage.

1.7 LAND USE, HOUSING, AND SCHOOLS (LU)

LU-1. ***Impact on Other Planning Districts in the Presidio***

At the public hearing held on the Draft SEIS, the president of the NAPP requested that the Trust assess the impact of the project on not only the PHSH district, but also on the other planning districts in the Presidio. "That may help us to see the trade-offs that you're asking us to make, not only on this project, but on other projects. And it will also help … groups… that try to be supportive coalitions to avoid the not-in-our-backyard syndrome, so you don't have to face that on a project-by-project basis."

Response LU-1 – Due to the remoteness of the PHSH district from other developed areas of the Presidio, the impact of the project on other planning districts due to the change in activity levels would be minimal. As discussed in Section 3.1.2 (Land Use, Housing and Schools), the project's greater emphasis on residential use (when compared to the PTMP's educational use) would constrain the Trust from reaching the maximum number of dwelling units stated for one or more other districts of the Presidio (so as to stay below the overall maximum of 1,654). The smaller number of dwelling units that would be allowed in the other districts (ranging from 20 for Alternatives 2 and 3 to 59 for Alternative 4) would reduce effects elsewhere within the Presidio, but this reduction should not be considered significant or adverse, or relevant to choosing among the alternatives.

LU-2. ***Residential Densities and Surrounding Neighborhoods***

Many individuals and neighborhood organizations said that the scale and density of Alternative 2 are completely out of character with the neighborhood and threaten "our quality of life." RPN commented that "[a] reduction in size is warranted to preserve the character of the neighborhood" as set forth in the Trust's goal of seeking high-quality site planning and design compatible with the NHLD and surrounding neighborhoods. Many also proclaimed that even Alternative 3 is out of scale with the neighborhood and "barely acceptable," but said that they were "willing to live with it" to ensure the success of the Presidio. RPN alleged that the Draft SEIS is "rife with attempts to disguise the inappropriate scale of the residential alternatives by portraying Alternative 2's population density as virtually identical to the surrounding single-family home neighborhood and Alternative 3's density as incrementally lower than the surrounding neighborhood." They claimed that this conclusion is "absurd" and can only be reached by spreading the population over the entire 18-acre area (much of which is open space and parking areas) and comparing it to three-and-a-half square city blocks of housing with no public park space. RPN also noted that the only buildings in the area with more than 50 units are medical facilities, schools, and religious institutions, suggesting that even Alternative 3 is "manifestly out of scale with the neighborhood."

The CCSF concurred with RPN, suggesting that the comparison of densities of the project alternatives and the surrounding area is "very misleading." They asked that the SEIS clarify the areas being compared and provide a realistic analysis of the comparative densities in order to allow the public to assess the analysis and evaluate the impacts on land use. They also felt that the Draft SEIS statement that the project will provide less than one percent of the total housing in the entire Richmond is misleading and

"unenlightening." They noted that the housing to be located in a large multi-story building is very dissimilar in character from the surrounding single-family, low-rise residential neighborhood, and that the Draft SEIS should reflect this difference.

NAPP questioned the method for analyzing density of the project. "While square footage is one way to measure density, the type of resident and how they will use the space is most relevant." NAPP requested "data be provided to compare the impact of different types of residents." They also requested traffic data based on leasing to Presidio-based employees and on public transit policies such as car-sharing goals, as well as explanation of underlying assumptions on use of public transportation, the number of cars per dwelling unit, and parking needs.

Response LU-2 – Information provided in the Draft SEIS regarding the density associated with the EIS alternatives compared with the surrounding neighborhood (Figure A-1) was included at the request of commenters on the EA. The commenters asserted their belief that the proposed alternatives were wholly out of keeping with the densities in the surrounding neighborhood. On the contrary, the SEIS explains that the number of dwelling units proposed on the site (i.e., the residential density) is consistent with the number of dwelling units in a comparable area of the surrounding neighborhood. In both cases, the comparable area includes the open spaces, streets, and parking areas associated with the dwelling units.

The SEIS also explains that the PHSH hospital building – which is an existing building – is bigger and larger than any other building in the neighborhood (see Section 3.7.2), and thus could be considered "out of scale" with the neighborhood. Because the building is already in existence, however, its dissimilarity with houses in the surrounding neighborhood should appropriately be viewed as an impact associated with the building's construction (in the 1930s and 1950s), and not with its reuse. All of the alternatives assessed in the SEIS would reuse the existing structure in whole or in part. The SEIS also explains that access to the PHSH site is constrained, and fully analyzes the amount of traffic that would use 14th and 15th Avenues under each alternative. It further describes the expected population within the complex in each alternative, and associated impacts. For all these reasons, the SEIS is not "misleading," but offers the required information and analysis. The effect of Presidio-based employees and transportation demand strategies on the transportation analysis assumptions is discussed later in these responses to comments (see Response to Comment TR-11).

LU-3. *PHSH Project as a San Francisco Residential Development*

Many neighborhood organizations and individuals cautioned that maximum build-out of the hospital would have permanent ramifications for the neighborhood (and the park). "Once built and leased for seventy-five years, the ensuing damage cannot be undone in our lifetimes." PAR urged that the PHSH development should be viewed and evaluated as not just an internal Presidio Trust matter, but also as a San Francisco residential proposal. SPUR agreed on this point: "[w]hile the Public Health Service Hospital site falls under the jurisdiction of the Presidio Trust rather than City jurisdiction, its development will have a significant effect on San Francisco." PAR asked that the analysis consider such factors as the appropriate scale and size of development in the context of city neighborhoods; the provision of utility,

fire and safety public services; access to amenities; and how the provision of services and amenities would affect the existing nearby neighborhoods. Several individuals were very candid: "gigantic projects affect streets, neighborhoods, and even entire cities." And: "[y]our gigantic project will not only disturb the Yin-and-Yang of our neighborhood, it is bad Feng Shui." And: "[d]o you wish to be a good neighbor or not?" And: "[h]ow is it that we'll be better off with the project than without?"

SPUR acknowledged concerns from neighboring residents regarding traffic and congestion and recognized the importance of proactively addressing these concerns. However, in noting that the PHSH district represents one of the most significant opportunities to meet housing goals for the entire Presidio area, the civic organization "strongly supported" the intensity of use outlined in Alternative 2 because it is "consistent with the PTMP, which was adopted after extensive community review and environmental evaluation." SPUR found the PHSH project to have "significant potential to rehabilitate a profoundly blighted site within the Presidio, to provide much-needed housing for both Presidio employees and San Francisco residents, and to help the Presidio meet its obligations as a historic National Park and a self-supporting economic enterprise."

Response LU-3 – Both the PTMP EIS and the SEIS note that most of the buildings within the PHSH district are vacant and in need of rehabilitation. The SEIS concludes that the introduction of new uses and activities at the project site would constitute a change that would be noticeable to nearby neighbors. Neighbors could be affected by increased activity at the site and by additional noise and traffic in the vicinity. Changes related to land use, housing and schools, transportation, air quality, noise, and utilities and services are described in Section 3, Affected Environment and Environmental Consequences, of the SEIS, and quantified where feasible. The analysis demonstrates that although many of the changes would be noticeable, all would fall well within levels evaluated in the PTMP EIS when the PTMP was adopted. Also, no change would be so great as to cause significant adverse impacts on the Presidio, the surrounding neighborhoods, or other environmental conditions with the mitigation measures previously adopted in PTMP and additional mitigations identified in the SEIS.

The Trust will develop a construction traffic management plan to specify routes, times of operation, and other factors to mitigate construction impacts on neighbors both inside and outside of the park. Following occupancy of the buildings, vehicular traffic not destined for the PHSH district would be discouraged from passing through the area, and traffic-calming techniques to slow traffic through the district would be instituted. The parking supply provided would be adequate to accommodate on-site parking demand and discourage parking in the adjacent neighborhood, but the limited surplus would encourage transit use and other non-automobile modes of travel. 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.

Planning guidelines developed for the district address issues of site planning, public access, landscape, transportation, building location, massing and scale, and architectural design. The guidelines acknowledge the strong visual and physical links to the city and provide measures, including setbacks, building height limitations, and vegetative buffers, to minimize impacts on neighbors outside the Presidio gates.

The project provides for adequate buffers, visual screening, and public access to limit the impact of new development on the neighborhood. A network of public open spaces and strong pedestrian and bicycle connections would be created to enhance public enjoyment of the site and to link the district to adjacent neighborhoods. Scenic and historic views into and out of the district would be preserved and enhanced. Tree stands would be planted to create screening, and small-scale elements would be used to create a residential setting. Finally, points of interest and interpretive opportunities that may include wayside displays, walking tours, and exhibits related to the ecology and history of the site would be developed.

These and other factors suggest that the reactivation of the PHSH district under Alternatives 1 through 4 after many years of vacancy would benefit San Francisco's neighborhoods, whether the project is considered in isolation or in combination with other changes planned for the Presidio or surrounding areas.

LU-4. ***Jobs-Housing Balance***

RPN and several individuals stated that the Draft SEIS does not address in any meaningful way the Trust's objective to further a jobs-housing balance at the Presidio and to provide housing for Presidio-based employees as a way to limit energy consumption and auto trips in and out of the park. They submitted that the Trust should mandate that half of all rental units be reserved for Presidio-based employees and incentives should be given to those employees to utilize housing at the PHSH. They also asked the Trust to require the developer to actively market these rental units to park employees. "[U]nless these requirements are written into contracts with the private development team and its apartment managers, this objective will not be realized."

The Sierra Club also reiterated that preference for housing in the Presidio should be given to Presidio-based employees, and that the SEIS should provide information on how many of the PHSH dwelling units are expected to be rented to park-based employees. "The number of occupants at PHS that are expected to be working in the Presidio is directly related to the projections of traffic in and out of PHSH Lake Street entries and related community impacts." They also urged the Trust to initiate the program contemplated in the PTMP to reconfigure non-historic dwelling units to increase the supply of smaller units. "This will move the Trust towards achieving a higher proportion of park based workers living in the park and avoid the possible future need for new construction."

Response LU-4 – The Trust appreciates the advice and comments regarding ways to achieve a higher ratio of Presidio-based employees in the PHSH project and in Presidio housing in general. It is the Trust's policy (PTMP, page 42) to provide housing preference to full-time Presidio-based employees as a way to accommodate employee housing demand and reduce automobile traffic in and out of the park. This preference will be memorialized in the Trust's agreement with the PHSH developer to the extent feasible under laws governing fair housing. The project's compliance with the PTMP's PBE policy is a reasonable approach that would contribute to achieving a jobs/housing balance as envisioned under the PTMP. For more general information on housing and projections of demand associated with Presidio-based employees, refer to the PTMP Final SEIS, Volume II, Section 4.18.

LU-5. ***Senior Housing***

RPN and many individuals offered that a means of ensuring neighborhood compatibility is to require that all or a significant portion of the residential tenants be seniors. They said that the PTMP identified senior housing as a preferred use for the hospital building, and that this is "not surprising given that senior living is most compatible with the national park setting." They pointed out that senior housing would help to minimize traffic, noise, and light and would best protect the adjacent natural resources. It appeared to one individual that exclusively senior housing would be "excessive" but a portion should be considered suitable for senior living.

Response LU-5 – The Trust appreciates this statement of preference and has included senior housing in the range of alternatives being considered. See Section 2.9, Other Alternatives, as well as the analysis of environmental consequences associated with Alternative 4, the Battery Caulfield Alternative.

LU-6. ***Affordable Housing***

One individual mentioned that the project should include "low, low low and moderate cost [housing] and this should be a part of senior units and employee housing units." Another individual at the public hearing on the Draft SEIS suggested that the project "have at least the 20 percent that the city requires." SPUR found the affordable housing component "impressive" given that it is not a requirement of the Presidio and the 20-percent level exceeds the City's affordable housing requirements for a comparable project.

Response LU-6 – The Trust supports the availability of affordable housing in Area B of the Presidio through the Trust's Preferred Rental Program. Under this program, which applies to nearly 20 percent of the Trust's housing stock, full-time Presidio-based employees with household incomes equal to or less than the area median (adjusted for household size) pay 30 percent of combined household income for rent and utilities. The Trust will not require an affordable housing component for this project. An overview of the Trust's existing residential programs is provided in the response to Comment HO-5 (Housing Affordability) beginning on page 4-179 of Volume II (Response to Comments) of the PTMP Final EIS.

LU-7. ***Contribution to San Francisco Schools***

The CCSF asked how the amount being contributed to the San Francisco Unified School District (SFUSD) under the federal School Impact Aid Program compares to the amounts a private developer would be required to contribute to the SFUSD. They suggested that this information would help the reader assess the adequacy of the contribution to San Francisco schools and determine whether additional, unmitigated burdens are being placed on the school district. They also asked that the SEIS define and enumerate what actions the Presidio Trust has already taken to "collaborate" with SFUSD in order to give better definition to the mitigation measure.

Response LU-7 – Under AB 2926, the SFUSD collects a one-time fee of $2.24 per square foot when building permits for new residential construction are issued within the CCSF. Developer fee revenues are

used, in conjunction with other district funds, to support efforts to complete capital improvement projects. This compares to roughly $246.36 received annually by the SFUSD through the School Impact Aid Program for each Presidio student attending SFUSD schools. In Fiscal Year 2000 (the latest year figures are available), 107 Presidio students were enrolled in SFUSD schools. The SFUSD uses School Impact Aid Program funds in whatever manner they choose, including current expenditures, in accordance with local and State requirements. The Trust coordinates with the SFUSD on an ongoing basis, including (most recently) working closely with and providing financial support to the SFUSD to ensure that its Presidio Child Development Center remains open within the Presidio.

LU-8. ***Long-Term Use of Battery Caulfield***

The Golden Gate Audubon Society felt that Battery Caulfield should be restored as a central dune scrub area in order to facilitate a greater contiguous quail habitat. Several individuals felt that use of Battery Caulfield as a corporation yard is an incompatible use and should cease as soon as possible.

Response LU-8 – The Trust appreciates Golden Gate Audubon's statement of preference as well as its support in restoring quail habitat near the PHSH site. The Trust will notify the Audubon Society of any future planning related to Battery Caulfield, although none is anticipated until after adoption of a PHSH alternative based on this Final SEIS.

1.8 TRANSPORTATION (TR)

TR-1. ***Blocking the 14th & 15th Avenue Gates***

The CCSF noted that the Board of Supervisors recently introduced legislation to temporarily close 15th Avenue, asserted that the SEIS must anticipate that 14th and 15th Avenues may not be available for access to the project site, and suggested the SEIS provide a traffic analysis that considers closures of the 14th and 15th Avenue Gates. Caltrans also inquired about the impacts on traffic operations in the area if the CCSF were to block the 14th and 15th Avenue Gates. Many residents of the surrounding neighborhood individually expressed a desire to close the gates. One individual acknowledged that residents in the neighborhoods surrounding other Presidio gates are upset by the prospect of the additional traffic that would be created if the city were to block the 14th and 15th Avenue Gates, and suggested that these concerns as well as those of the Lake Street neighborhood could be resolved if the project were downsized. A Presidio resident expressed concern about the effect of closing the gates on Presidio residents' access to housing in the West Washington neighborhood, and suggested that if compromising on the size of the project would result in the city not pursuing closure of the gates, the Trust should consider such a compromise.

SPUR and the West Presidio Neighborhood Association expressed opposition to closure of the gates. SPUR suggested that the success of the project depends on a "high level of connectedness" between the site and the adjacent residential neighborhoods, and asserted under no circumstances should any new

barriers to access (pedestrian or vehicular) be created. SPUR suggested that instead new opportunities for interface through pedestrian and bicycle paths and public transit should be pursued and traffic calming measures should be used to slow traffic passing through the 14th and 15th Avenue Gates. Some individuals agreed with the Trust's assertion that closure of the gates would likely cause friction with neighbors of other entrances, and that instead neighbors and the Trust should be "deepening and strengthening our relationships." The San Francisco Bicycle Coalition expressed a desire to retain pedestrian and bicycle access through the 14th and 15th Avenue Gates as this access is part of an important citywide and regional bicycle route.

Response TR-1 – The resolution introduced by the Board of Supervisors in October 2004 is currently inactive and pending call of the Chair of the Land Use Committee of the Board of Supervisors. In response to comments on the PHSH EA, the Trust analyzed the traffic conditions that would result from closure of the 14th and 15th Avenue Gates. A summary of the results is included in responses to comments in the Draft SEIS (Appendix A).

The Trust agrees with SPUR's position that closure of the 14th and 15th Avenue Gates would impede the connectivity of the PHSH district and the surrounding residential neighborhood. The Trust believes that keeping the gates open is critical to providing public access to a national park, and agrees with SPUR's assertion that maintaining this connectivity also breeds a sense of shared community at the local level. The Trust will make every effort to maintain pedestrian and bicycle access through the 14th and 15th Avenue Gates in order to provide the network described in the Presidio Trails and Bikeways Master Plan. However if the city takes measures to block access to the gates, it would be the city's responsibility to ensure that pedestrian and bicyclist access is maintained at these gates. In addition to reducing the number of dwelling units and thereby the forecasted traffic generated in Alternative 2, the Trust's Preferred Alternative, the Trust will provide transportation demand management strategies, transit links to other parts of the Presidio, and traffic calming measures at the project site in order to address the traffic-related concerns of the surrounding neighborhoods.

TR-2. ***Alternatives to Park Presidio Boulevard Access Variant***

The GGBHTD indicated that the Draft SEIS does not clearly indicate how traffic on Park Presidio Boulevard will reach the PHSH district, and asked if southbound right turns and northbound left turns would be permitted from Park Presidio Boulevard at the variant intersection. The GGBHTD also questioned whether the level of service analysis for the variant intersection accurately analyzes the lane drop immediately north of the intersection, and requested that an explanation be provided for the relatively good level of service at the variant intersection compared to the levels of service at the intersections of Park Presidio Boulevard/Lake Street and Park Presidio Boulevard/California Street. One individual asked how the new intersection would help new residents wishing to go north on Park Presidio Boulevard.

One individual suggested building on- and off-ramps connecting Park Presidio Boulevard with West Pacific Avenue/Park Boulevard to provide access to the PHSH district. Another individual suggested that

the Park Presidio Boulevard Access Variant should simply be comprised of a southbound "on-ramp" from the PHSH district to southbound Park Presidio Boulevard as a less expensive and less complicated alternative to a new signalized intersection (necessary City approval notwithstanding). The same individual also suggested that if 14th and 15th Avenues were to operate as a couplet, 16th Avenue could be considered for two-way access to the PHSH district in order to relieve the impact on residents on 14th and 15th Avenues. Another individual suggested that the Park Presidio Boulevard Access Variant provide a northbound left-turn lane so that the 14th and 15th Avenue Gates could be closed, and suggested that the design currently proposed will create more congestion at California Street/Funston Avenue and Lake Street/Funston Avenue given the prohibition of left turns from Park Presidio Boulevard.

Response TR-2 – The Park Presidio Boulevard Access Variant is described in Section 2.8 of the Final SEIS. The variant would allow traffic to enter the PHSH district from southbound Park Presidio Boulevard and would allow traffic exiting the district to turn left onto northbound Park Presidio Boulevard or turn right onto southbound Park Presidio Boulevard. The only turning movement that would not be permitted is the northbound left turn into the PHSH district from Park Presidio Boulevard. Providing this turning movement without significantly affecting traffic flow on Park Presidio Boulevard would require widening the highway to add an exclusive left-turn lane. Because widening on the east side would intrude on the Mountain Lake wetland and widening on the west would cause a significant effect on the contributing features to the National Historic Landmark District, widening to provide the left-turn lane would be extremely difficult if not infeasible.

The lane drop from three lanes to two lanes immediately north of the variant intersection would operate much like the existing lane drop immediately north of the intersection of Lake Street/Park Presidio Boulevard. The variant intersection would primarily differ from the Lake Street/Park Presidio Boulevard intersection in its prohibition of pedestrian movements across Park Presidio Boulevard. Because pedestrians would not be allowed to cross Park Presidio Boulevard at the variant intersection, less green time would be needed for the eastbound approach, and consequently more green time could be provided to the north-south traffic movements, thereby more closely matching the ideal signal timing for the ratio of traffic on each approach. Additionally, because the eastbound left-turn movement is expected to carry less traffic than the eastbound right turn movement, the traffic on the northbound approach would be provided even more green time than the southbound approach, and therefore would incur very little delay.

The concept of ramp(s) connecting Park Presidio Boulevard with West Pacific Avenue was considered. The ramp(s) would have a similar number if not more design exception requirements than the variant intersection, and the grade differences between the two roadways would make it practically infeasible to provide ramps for all desired traffic movements. The concept of a ramp from the PHSH district to southbound Park Presidio Boulevard was also considered in various forms, but such a ramp would require a similar number of design exceptions as a signalized intersection, and would require the use of property west of Park Presidio Boulevard and east of 14th Avenue that is currently under the jurisdiction of the San Francisco Recreation and Park Department. Section 4.113 of the San Francisco City Charter states that structures shall not be built on San Francisco Recreation and Park property for non-recreational purposes without approval from San Francisco voters. This access alternative was dismissed for this reason.

Similarly, creating access to the PHSH district via 16th Avenue would involve substantial capital investment and is not warranted, as the existing gates at 14th and 15th Avenues provide adequate access to the project site.

TR-3. ***Effects of Park Presidio Boulevard Access Variant on Highway 1 Traffic Operations***

Caltrans, the CCSF, and the San Francisco Bicycle Coalition expressed a number of concerns about the Park Presidio Boulevard Access Variant. Specifically, Caltrans expressed concern that:

- The type of control for the southbound right-turn movement or the configuration of roadways within the PHSH district may result in a queue that extends onto southbound Highway 1, and thereby negatively affect the operation of Highway 1.

- There may not be adequate stopping sight distance for southbound traffic approaching the Park Presidio Boulevard Access Variant intersection.

- Northbound vehicles on Highway 1 may not be able to climb the grade approaching the MacArthur Tunnel given that the Park Presidio Boulevard Access Variant would reduce the level section north of the last intersection.

- The proposed new signalized intersection would create additional delay for vehicles on Highway 1 "for which there is no apparent mitigating operational benefit." Caltrans requested that the operational benefits be discussed.

- The SEIS precludes other alternative configurations for the Park Presidio Boulevard Access Variant intersection. Caltrans believes that the SEIS should not assume that direct access to the project site from Park Presidio Boulevard will be approved nor should the SEIS predetermine the configuration of this intersection. Caltrans further stated that if it is determined that an intersection on Highway 1 providing direct access to the PHSH district is allowable, an unsignalized "right turn in/right turn out only" intersection would result in the least operational impact on Highway 1 traffic, assuming that Caltrans design standards could be met or exceptions to these standards are granted from Caltrans Headquarters.

The CCSF requested that the SEIS specifically address traffic safety issues associated with the Park Presidio Boulevard Access Variant, including any increased risk of rear-end collisions or red-light running given the configuration of Park Presidio Boulevard at this location. The San Francisco Bicycle Coalition suggested that the safety of cyclists and pedestrians on the multi-use trail (Park Boulevard) within the PHSH district should be considered in the design of the Park Presidio Boulevard Access Variant.

Response TR-3 – The Trust submitted initial documentation to Caltrans for a traffic signal warrants analysis, traffic accident analysis, and exceptions to advisory and mandatory design standards in November 2004. Many of the issues raised by Caltrans are discussed and evaluated in these documents.

The traffic volumes associated with Alternative 2 (the Trust's Preferred Alternative) have been modified due to the reduction in number of dwelling units in Alternative 2 since release of the Draft SEIS and the changes in traffic assignment to the roadway network based on the inclusion of more restrictive traffic calming measures on Battery Caulfield Road. The reduction in traffic generated by Alternative 2 and the associated failure to meet any of the three Caltrans warrants for planned intersections (see Response AL-5) suggest that the likelihood of Caltrans approving the intersection is greatly diminished.

The circulation network within the PHSH district as shown in the materials submitted to Caltrans in November 2004 provides approximately 85 meters of vehicle storage length between the intersection on Park Presidio Boulevard and the adjacent intersection in the PHSH district for the right-turn movement from southbound Highway 1 into the PHSH site. This length would accommodate about 11 queued vehicles, and is expected to adequately accommodate the expected peak hour volumes for this movement (43 vehicles per hour in the AM peak hour and 48 vehicles per hour in the PM peak hour with Alternative 2). The local streets serving the eastern portion of the PHSH district would carry low traffic volumes, which would allow this intersection to operate efficiently with either all-way stop control or two-way stop control.

The Fact Sheet for Exceptions to Mandatory Design Standards submitted to Caltrans in November 2004 identified the inability to meet the Caltrans standard for stopping sight distance for the southbound lane nearest the center median on Park Presidio Boulevard. The inability to meet the Caltrans standard for stopping sight distance for the No. 1 (median) southbound lane could affect the probability of rear-end collisions or other types of accidents for which stopping sight distance is a factor.

The analysis assumes that the traffic signal at the new intersection would be coordinated with the traffic signal at the Park Presidio Boulevard/Lake Street intersection to provide efficient signal progression. The assumed offset between the green phase for the northbound direction is such that very little northbound traffic (including trucks) would need to stop at the variant intersection.

The proposed signal timing offset would allow for efficient signal progression, which would minimize delay for northbound and southbound traffic at the variant intersection. The average delay incurred at the new intersection by through traffic on Park Presidio Boulevard would be 8.3 seconds or less in the AM peak hour and 15.6 seconds or less in the PM peak hour. Although the additional traffic facilitated by the signal would create some additional delay for vehicles on northbound and southbound Highway 1, the intersection could potentially improve pedestrian and bicycle safety at the intersection of Park Presidio Boulevard/Lake Street by creating a transition between highway conditions and city street conditions.

The conceptual design of the variant intersection considers the multi-use trail on Park Boulevard. Should the variant intersection be approved and implemented, the design will provide for a safe crossing and will not cause any safety concerns for cyclists or pedestrians on this multi-use trail or other parts of the PHSH district.

TR-4. ***Effect of Park Presidio Boulevard Access Variant on Pedestrian and Bicycle Safety***

Caltrans disagreed with the Draft SEIS's assertion that the Park Presidio Boulevard Access Variant would improve pedestrian and bicycle safety, and would like to review the data or information on which this conclusion is based. Caltrans also asked whether pedestrians and bicyclists would be able to enter the PHSH district via 14th and 15th Avenue Gates.

Response TR-4 – The Trust will make every effort to maintain pedestrian and bicycle access through the 14th and 15th Avenue Gates by providing the network described in the Presidio Trails and Bikeways Master Plan. However, if the CCSF takes measures to block access to the gates, it would be the CCSF's responsibility to ensure that pedestrian and bicycle access is maintained at these gates. The Trust believes that the Park Presidio Boulevard Access Variant would improve safety for pedestrians and cyclists on Lake Street as the new intersection would act as a transition point between highway conditions and city street network conditions. However, the Trust has no scientific data to support this conclusion. The Final SEIS has been revised accordingly.

TR-5. ***Encroachment Permit***

Caltrans noted that any project-related work within the State's right-of-way will require an encroachment permit and provided instructions on how to apply for such a permit.

Response TR-5 – The Trust is aware that an encroachment permit would be required for project-related work within Caltrans right-of-way, and will apply for the permit should the Park Presidio Boulevard Access Variant be implemented.

TR-6. ***Requested No Action Alternative Trip Generation Rates***

RPN suggested that the Requested No Action Alternative as presented is an inadequate benchmark against which to compare the effects of Alternatives 1 through 4. RPN suggested that the trip generation rates for the Requested No Action Alternative do not reflect current or recent conditions and result in travel demand projections that are "patently false and misleading." RPN's traffic consultant noted that the trip generation projection for the Requested No Action Alternative is very similar to the projection for Alternative 2, and suggested that the Trust deliberately selected a no action alternative that would yield such an analysis.

RPN's traffic consultant also compared trip generation projections for the Requested No Action Alternative and Alternative 2 to traffic counts through the 15th Avenue Gate in 2000, and noted that the Requested No Action Alternative would generate approximately twice and three times the volume of traffic counted at the 15th Avenue Gate in 2000 in the AM peak hour and PM peak hour, respectively.

Response TR-6 – The trip generation rates used for the Requested No Action Alternative were intended to represent the travel patterns of the current tenants (Lone Mountain Children's Center and Arion Press) and former recent tenant, the Jewish Community Center (JCC). The pick-up and drop-off activity

associated with the Lone Mountain Children's Center and the JCC by definition result in relatively high trip generation rates. The person trip generation rate used in the Draft SEIS analysis is 67 person trips per thousand square feet of exterior building area, which is roughly equivalent to the rate used by the CCSF Planning Department (67 trips per thousand gross square feet of space).

Trust staff counted turning movements into and out of the eastern portion of the PHSH district in the AM peak hour and PM peak hour when it was occupied by Lone Mountain Children's Center, Arion Press, and the JCC (September 25, 2001). The count data indicate that 103 vehicles entered and 71 vehicles exited the eastern portion of the project site during the AM peak hour. In addition, Trust staff observed approximately 17 cars parking in the lot immediately west of 15th Avenue and their drivers walking to the eastern portion of the site. Therefore, a total of 191 one-way AM peak hour vehicle trips were generated by these uses. Based on the trip generation rate, mode split, and auto occupancy assumptions made in the Draft SEIS, these tenants would generate 224 one-way vehicle trips in the AM peak hour, which is approximately 17 percent more than the trip generation observed while the JCC occupied the project site. Based on the findings described above, the daily, AM peak hour, and PM peak hour rates for the preschool use were reduced by 15 percent to 57 daily person trips per thousand gross square feet, 9.1 AM peak hour person trips per thousand gross square feet, and 10.3 PM peak hour person trips per thousand gross square feet (see Appendix B) to more closely reflect the actual traffic counts representative of the Requested No Action Alternative. The change also more closely reflects the CCSF Planning Department rate, since the 15 percent reduction approximates the difference between exterior building area and interior space. This change to the trip generation rate for day care/preschool uses was also made for the other four alternatives.

It should be noted that the JCC's lease restricted the number of vehicles traveling to and from the JCC that could travel through the 15th Avenue Gate. For this reason, approximately 57 percent (109 vehicles) of the traffic traveling to and from the eastern portion of the project site during JCC occupancy traveled through the 15th Avenue Gate and the remaining 43 percent (82 vehicles) traveled on Wedemeyer Street and Battery Caulfield Road to use other gates. The traffic assignment assumed for the analysis of PHSH alternatives in the Draft SEIS did not reflect this pattern. For this reason, the traffic observed traveling through the 15th Avenue Gate while the JCC occupied part of the PHSH district does not correlate directly to the vehicle trips expected to be generated by the occupants at the time. The traffic assignment assumptions for all PHSH alternatives have been revisited and refined in the Final SEIS to reflect the addition of more restrictive traffic calming measures at the project site and on Battery Caulfield Road (see Responses to Comments TR-15 through TR-17).

TR-7. ***City Guidelines***

RPN asserted that, because the transportation analysis did not use Transportation Impact Analysis Guidelines (City Guidelines) (CCSF 2002b) as a source for trip generation rates for all land uses is not the "credible worst case" impact analysis "frequently required in environmental impact evaluations," and underestimates significant traffic impacts, rendering the Draft SEIS inadequate. RPN's traffic consultant determined that if trip generation rates from the City Guidelines had been used, Alternative 2 would have

been shown to result in 24 percent more vehicle trips in the PM peak hour than estimated in the Draft SEIS.

Response TR-7 – As stated in the response to a similar comment made on the PHSH EA, the traffic analysis in the EA, Draft SEIS, and Final SEIS uses the City Guidelines as one among several sources for travel demand characteristics of the PHSH district. The travel demand characteristics provided in the City Guidelines do not accurately reflect the Presidio's environment in all cases, nor do the City Guidelines include trip generation rates for the AM peak hour. For these reasons, information from other available standard data sources accepted and commonly used by traffic analysis professionals, such as the State of California Department of Transportation (Caltrans) and the Institute of Transportation Engineers (ITE), as well as the City of San Diego, were also considered (see Table 4).

The trip generation rates chosen for the PHSH traffic analysis are in fact very similar to the trip generation rates provided in the City Guidelines, with the only material difference being the PM peak hour trip generation rate for residential uses. The daily trip generation rate for a dwelling unit in the SEIS analysis is the same as that provided in the City Guidelines for a two-bedroom dwelling unit,[6] but rather than assuming that 17.3 percent of the daily trips to and from a dwelling unit would occur in the PM peak hour, the PHSH transportation analysis assumes a smaller percentage of trips (10.5 percent) would occur in the PM peak hour. The results of using these rates are that daily trips associated with all dwelling units are the same as would be projected using the City Guidelines, but the percentage occurring within the afternoon rush hour is about 6.8 percent less. The lesser percentage and the results achieved through its application are considered more reasonable by the Trust's transportation professionals and consultants because they are consistent with the ratio of PM peak hour trip generation rates to daily trip generation rates for residential uses from all other sources considered (see Table 4 below for sample data). The 2001 National Household Travel Survey was also consulted; the survey results indicate that 7.9 percent of household trips occur between 5:00 PM and 6:00 PM.

Table 4. Trip Generation Data

	Weekday Trips / Unit	Number of Studies	Weekday PM Peak Hour Trips / Unit	Number Of Studies	PM Peak Hour Percentage Of Daily Trips
Institute of Transportation Engineers Trip Generation Manual (Sixth Edition)					
Single-Family Detached Housing	9.57	348	1.01	294	10.6%
Apartment	6.63	80	0.62	78	9.4%
Low-Rise Apartment	6.59	22	0.58	26	8.8%
High-Rise Apartment	4.20	9	0.35	17	8.3%

[6] The Final SEIS transportation analysis conservatively assumes a daily trip generation rate of 10 person trips per unit for all dwelling units, regardless of the number of bedrooms.

Table 4. Trip Generation Data

	Weekday Trips / Unit	Number of Studies	Weekday PM Peak Hour Trips / Unit	Number Of Studies	PM Peak Hour Percentage Of Daily Trips
Residential Condominium/Townhouse	5.86	53	0.54	57	9.2%
High-Rise Residential Condominium/Townhouse	4.18	4	0.38	5	9.1%
Mobile Home Park	4.81	37	0.56	24	11.6%
The City of San Diego Trip Generation Manual					
Multi-Family Dwelling Unit					
Under 20 dwelling units per acre	8.00	NA	0.80	NA	10.0%
Over 20 dwelling units per acre	6.00	NA	0.54	NA	9.0%
Single-Family Detached Unit					
Urbanized Area	9.00	NA	0.90	NA	10.0%
Urbanizing Area	10.00	NA	1.00	NA	10.0%

Source: Institute of Transportation Engineers 1997; City of San Diego 1998.
Note:
NA = not applicable

TR-8. ***Neighborhood Quality of Life and Residential Level of Service (RLOS) Criteria***

Several individuals expressed concern about the project's generation of additional traffic and the effect on neighborhood streets near the PHSH district, and felt that the additional traffic generated by the project would worsen congestion and further compromise safety in the neighborhood. Many of these individuals asserted that introducing fewer cars is the only way to mitigate the traffic impacts on the adjacent neighborhood, and many expressed a preference for Alternative 3 for this reason. One individual speculated that using traffic calming measures to slow traffic where the existing speed limit is already 25 miles per hour would not adequately address neighborhood residents' concerns, and suggested that a smaller project was the best solution.

One individual, however, suggested that immediate neighbors of the PHSH district "also have contributed to the overall increase [in traffic], as most of the households currently own and operate more vehicles than when the homes were first constructed. New development should attempt to minimize increased noise, and traffic, and with that increased air pollution, but the project should not be held hostage by one class of interested parties."

RPN suggested that the level of service (LOS) criteria typically used to evaluate traffic impacts on the operation of key intersections is not appropriate for residential streets, and suggested "quality of life" criteria are more appropriate for assessing impacts to neighborhood residential streets. As an alternative, RPN suggested that the residential level of service (RLOS) concept be used because it considers how traffic affects a resident's ability to walk across a street, ride a bicycle, or back out of driveways.

Response TR-8 – The Draft SEIS appropriately assesses potential impacts on traffic congestion and delay, as well as Presidio gate volumes, transit services, pedestrians, and bicyclists. The residential level of service standards suggested by the commenter are not necessary or appropriate for assessment of the project's impact on San Francisco streets, and are not a generally accepted standard among transportation and traffic analysis professionals either in the Bay Area or nationwide. The RLOS concept has not been deemed appropriate by the CCSF Planning Department for adoption as part of their Guidelines for Environmental Review. At the Presidio and in San Francisco, impacts on bicyclists, pedestrians, and "quality of life" are generally discussed qualitatively, and impacts on traffic are quantified using widely applied and accepted methodologies.

TR-9. *Parking Demand Analysis*

RPN suggested that the parking demand analysis is incomplete and may have underestimated evening and weekend parking demand because it does not explicitly include short-term demand associated with visitors of residential tenants or national park visitors who may wish to use trails from the PHSH district. RPN also asserted that the project's impacts to on-street parking conditions in the neighborhood have not been evaluated, stating "there is no doubt that the project alternatives will have an impact on neighborhood parking regardless if there is an existing shortfall and such impacts must be evaluated." One individual suggested that some parking should be included in the building and that parking should be retained at the trailhead for hikers and bicyclists.

Response TR-9 – The parking demand analysis does account for demand created by people visiting residential tenants. Although not explicitly separated from the parking demand of residents, a portion of the parking demand rate for dwelling units is attributable to visitors. The parking demand estimates included in the SEIS do not include estimates for recreational visitors (i.e., trailhead parking). However, the alternatives do provide a modest surplus of parking on the lower plateau, ranging from 12 spaces with Alternative 3 to 135 spaces with the Requested No Action Alternative. The surplus of parking spaces on the lower plateau would provide parking spaces for use by recreational visitors.

The parking analysis indicates that the parking supply in the PHSH district is estimated to exceed the parking demand for each PHSH alternative. Since none of the alternatives would result in a parking shortfall and all parking spaces for the project would be more convenient than spaces in the adjacent neighborhood, parking demand from the site would not be expected to "spill over" into the adjacent neighborhood. Observations of the vehicles parked in the lot in the PHSH district immediately inside the 15th Avenue Gate indicate that many of the vehicles parked in the lot have "N" zone residential parking permits and belong to residents in the adjacent neighborhood. These vehicles would likely be displaced

to another location in the neighborhood; such displacement is not an impact of the project, however, but the effect of inadequate parking supply in the adjacent neighborhood. The Trust's private development partner, if selected, has agreed to help residents of the adjacent neighborhood increase the "N" residential parking permit zone as needed to ensure that parking spaces in the adjacent neighborhood are retained for neighborhood residents and their visitors.

TR-10. ***Transit Trip Distribution and Assignment***

The GGBHTD requested that the Final SEIS indicate the assumed geographical distribution for work trips by PHSH district residents, and suggested that this information would validate the forecasted transit trips on Golden Gate Transit (GGT) routes. The GGBHTD noted that although GGT Route 10 directly serves the PHSH site as described in the Draft SEIS, the stop is approximately 900 feet from Building 1801; therefore, rather than using Route 10, North Bay passengers would more likely transfer between PresidiGo and one of the 19 GGT routes that stop at the Golden Gate Bridge Toll Plaza.

Response TR-10 – As requested, the Final SEIS provides the geographic distribution of trips to and from the PHSH district (see Table 11). As noted in the SEIS, the geographic distribution is based on data gathered as part of the PTMP SEIS transportation analysis, which in turn was based on a survey of Presidio employees, the San Francisco Planning Department's Guidelines for Environmental Review, and results from the San Francisco County Transportation Authority travel demand model. The Trust agrees with the commenter's assertion that North Bay passengers traveling to the PHSH district (i.e., southbound passengers) would likely transfer to the PresidiGo shuttle, since PresidiGo is generally more frequent than GGT Route 10. In the northbound direction, however, most passengers would likely choose to ride Route 10 to the toll plaza because of the current one-way nature of PresidiGo service, particularly in the morning commute when the frequency of GGT Route 10 is comparable to that of PresidiGo. Although the GGT routes used by transit passengers traveling to and from the PHSH district may vary, the analysis assumption that all North Bay transit passengers would use GGT Route 10 is believed to provide the most conservative evaluation of impacts. The analysis assumes that about 10 percent of transit passengers would be traveling between the PHSH district and the North Bay, and this is consistent with the current geographic distribution of Presidio residents and employees. Currently, only about five percent of Presidio residents work in the North Bay. The latest Presidio employee survey suggests that approximately 10 percent of Presidio Trust employees currently live in the North Bay.[7]

TR-11. ***Impact of Transportation Policies, Including Live-Work Model***

NAPP requested that the Final SEIS consider the traffic effects of different types of residents and different types of dwelling units as well as the implementation of the live/work model in the PHSH district. NAPP asked to see how the traffic data would differ if the Trust gave preference and/or incentives to Presidio-based employees, perhaps even incorporating into the lease a fixed percentage of

[7] The 2005 employee survey does not include employees of the Letterman Digital Arts (LDA) project. LDA was beginning to slowly move employees to the Presidio campus at the time the survey was conducted.

residents who would be Presidio-based employees, and/or if car-sharing goals were built into the project. NAPP also requested additional information about the underlying assumptions for the projected transit use, as well as traffic generation and parking demand per dwelling unit. NAPP also found the Draft SEIS difficult to navigate and suggested that data related to density be presented in a more user-friendly format.

The Sierra Club and one individual inquired about the assumptions regarding employment location for PHSH district residents that were used in the traffic analysis, and suggested that traffic projections should be adjusted to reflect preference for Presidio-based employees, consistent with Trust policy. The PHRA also inquired about the effect of the Presidio's live/work model on traffic conditions. One individual disagreed with the suggestion to factor the jobs/housing balance into the traffic analysis, and asserted that unless a specific number of units are designated for Presidio-based employees in the lease, including this assumption in the analysis underestimates the expected traffic through the 14th and 15th Avenue Gates.

Response TR-11 – As of June 2005, 11 percent of adult Presidio residents also worked in the Presidio and 66 percent worked elsewhere in San Francisco. As of February 2006, 20 percent (216 of 1,071) of Presidio households have at least 50 percent of the household adults working in the Presidio. The Trust currently gives Presidio employees priority in leasing dwelling units, and will likely continue to do so in the future.

The SEIS assumes a similar jobs-housing balance as assumed in the PTMP SEIS, although the overall number of jobs or dwelling units in the Presidio would vary among alternatives. Although the Trust's residential leasing policy of preference for Presidio employees reinforces the transportation-related benefits of a jobs-housing balance, including aggressive jobs-housing balance assumptions in the transportation analysis would yield results that do not provide a conservative assessment of potential traffic impacts associated with the project. The modest effect of the assumed jobs-housing balance is captured in the transportation analysis in a similar manner as in the PTMP SEIS; trips are divided into internal trips (trips that begin and end in the Presidio) and external trips (trips that begin in the Presidio and end elsewhere or vice versa). Dividing the trips into these two categories allows for the application of different modal splits. The analysis assumes that internal trips are more likely to be made by biking or walking than by automobile. See Appendix B for the estimated split between internal and external trips, and the assumed mode splits for each land use type.

TR-12. *Significance Criteria*

The CCSF requested that significance criteria used for the purposes of the transportation analysis be clearly stated. One individual questioned the standards for evaluating traffic impacts, and suggested that standards for evaluating traffic impacts on surrounding neighborhoods and City streets should be consistent with City standards. The individual also suggested that the different standards may also affect proposed mitigation measures, and asked what would happen if traffic impacts are worse than projected in the Draft SEIS.

Response TR-12 – In response to the CCSF's comment, additional explanation of the factors used in evaluating the relative significance of transportation impacts has been incorporated into the Final SEIS, as appropriate (see Table 12 in Section 3.2.2.2, Traffic at Local Intersections). The Trust believes that a description of these factors in the methodology section is appropriate and improves the Final SEIS, and appreciates the CCSF's careful review of the Draft SEIS. This expanded discussion does not, however, constitute the formal definition of "significance thresholds," which is not required under the NEPA as described in Response to Comment GE-3, Significance Standards. If actual traffic conditions are worse than estimated in the Final SEIS and one or more study intersections operates at LOS E or F, the Trust would work with the CCSF to determine whether the conditions warrant mitigation and, if so, what the mitigation measure should be and how much each party should contribute to the cost of the improvements.

TR-13. ***Expansion of Traffic Analysis***

NAPP requested that the Final SEIS evaluate traffic effects on roadways and intersections farther south. Some individuals questioned why total traffic delay was not presented for an individual traveling on a particular route (e.g., from the neighborhood to commercial center). One individual suggested that the project would add traffic to Highway 1, causing traffic to shift to other principal arterials, and argued that the effects of additional Highway 1 traffic on Lombard Street and Doyle Drive should be evaluated.

Response TR-13 – At the commenters' request, the intersections of Lake Street/Funston Avenue and Lake Street/17th Avenue were incorporated into the Draft SEIS traffic analysis. The intersection of Lake Street/17th Avenue was added because 17th Avenue is the street at which traffic would likely turn left or right in order to cross California Street because of the all-way stop control at the intersection of California Street/17th Avenue. The intersection of Lake Street/Funston Avenue was added to the analysis in order to assess the effects of traffic traveling to and from the PHSH district given the prohibition of left turns from Park Presidio Boulevard. Given the relatively small number of vehicle trips generated by the alternatives, the increased dispersion of project-generated traffic at increased distances from the PHSH district, and the relatively low volume of traffic at other intersections on Lake Street beyond these intersections, the addition of all of the intersections requested by the commenters cannot be expected to show discernable effects. Beyond the intersections analyzed in the Final SEIS, the likelihood of intersections degrading to an unacceptable LOS with the addition of project traffic is greatly diminished. Therefore, the addition of the two intersections of Lake Street/Funston Avenue and Lake Street/17th Avenue is considered adequate to fully assess the effects of the alternatives on neighborhood streets.

The analysis of traffic impacts provided in the Draft and Final SEIS by way of estimating delay and LOS at individual intersections is consistent with the approach outlined in the SF Planning Department's Transportation Impact Analysis Guidelines for Environmental Review. Because of the dispersion of traffic[8] from the project site to roadways other than Park Presidio Boulevard, an arterial analysis, or

[8] Sixty-two percent of AM peak hour traffic and 47 percent of PM peak hour traffic on the southbound approach to the intersection of Lake Street/15th Avenue currently turns right or goes straight through the intersection rather than turning left to reach Park Presidio Boulevard.

analysis of the delay experienced at a series of intersections, is not warranted. The traffic analysis also shows that the amount of traffic added to the intersections on Park Presidio Boulevard would constitute no more than four percent and three percent of the total traffic through the intersections in 2025 in the AM and PM peak hours, respectively. This volume of traffic would generally not degrade levels of service below LOS D and is not considered enough to divert a consequential amount of traffic to other streets.

TR-14. ***Mischaracterized Existing Traffic Conditions***

The CCSF suggested that the environmental setting data overestimate and mischaracterize the existing traffic on Lake and California Streets. The CCSF stated: "The SEIS provides computer-derived estimates of existing level of service (LOS) for the intersections on Lake and California Streets; we suggest that the data be verified in the field. Observation at some of the critical intersections shows that the traffic volumes are not as high as those predicted by the model (see Table 7). In addition, the Highway Capacity Manual (HCM) assumes that traffic arrives at random times on California and Lake Streets, rather than in platoons that are created by upstream traffic signals." One commenter drove through the intersection of Lake Street/15th Avenue, timed the delay, and found that the estimated delay for the intersection in the SEIS was higher than he experienced. The commenter questioned the methodology and assumptions used to estimate existing intersection delay.

Response TR-14 – The intersection analysis methodology is intended to represent typical delay conditions during the peak 15 minutes of the peak hour. As described in the background technical memoranda for the SEIS, the methodology estimates the delay for each approach at an all-way stop-controlled intersection and then averages the approach delays for an overall average intersection delay. It does not represent the delays experienced by all motorists traveling through the intersection during the peak hour, which may vary based on the direction of approach, time within the peak hour, or day of week. The Draft SEIS used traffic data from the year 2000 that were gathered for the PTMP SEIS. Traffic count data collected in the winter months of 2000 were also seasonally adjusted upward. Traffic counts collected in October 2005 indicate that traffic volumes at many of the study intersections have decreased between one percent and six percent per year from these year 2000 volumes. The delays and levels of service for existing conditions at study intersections therefore have generally improved. For example, the worst minor street approach of the intersection of Lake Street/14th Avenue was estimated to operate at LOS D in the AM peak hour and LOS E in the PM peak hour with the year 2000 data. The year 2005 data indicate that the intersection operates at LOS C in the AM peak hour and LOS D in the PM peak hour.

While the default assumption in the HCM methodology does not consider the influence of platoons created by upstream signals, all of the study intersections would only be influenced by the signals at Park Presidio Boulevard/Lake Street and Park Presidio Boulevard/California Street in one direction as intersections downstream are stop-controlled. In order to explore the effect of these signals further, the Trust has evaluated the portion of traffic on Lake and California Streets immediately downstream of the Park Presidio Boulevard intersections and determined the proportion coming from Park Presidio

Boulevard and the proportion coming from Lake Street or California Street. The degree of platooning caused by the signals depends on a significant portion of the traffic coming from Lake Street or California Street (rather than turning from Park Presidio Boulevard), since traffic turning from Park Presidio Boulevard would arrive on the segment when traffic on Lake Street or California Street would be stopped. Table 5 below indicates the portion of traffic on each downstream segment observed turning from Park Presidio Boulevard. With the possible exception of eastbound Lake Street in the AM peak hour, the percentage of traffic turning from Park Presidio Boulevard is adequate in each case to add volume to the gaps between platoons from upstream Lake Streets or California Street, thereby diminishing any potential platoon effect.

Table 5. Percentage of Traffic on Lake and California Streets Turning from Park Presidio Boulevard

	Portion Turning from Park Presidio Boulevard (%)	
Roadway Segment and Direction of Travel	AM Peak Hour	PM Peak Hour
Eastbound Lake Street – East of Park Presidio Boulevard	15	23
Westbound Lake Street – West of Park Presidio Boulevard	65	50
Eastbound California Street – East of Park Presidio Boulevard	30	32
Westbound California Street – West of Park Presidio Boulevard	27	22

Source: Wilbur Smith Associates, 2006c.

TR-15. *Projected Traffic Through the 14th and 15th Avenue Gates*

RPN suggested that the variation in projected 2020 traffic volumes through the 14th and 15th Avenue Gates across alternatives does not correspond to the variation in vehicle trips generated by alternatives. RPN also suggested that the comparison of traffic volumes through the 14th and 15th Avenue Gates is further complicated by "grossly overstating a projected volume associated with the Requested No Action Alternative."

Response TR-15 – The commenter correctly notes that there is not a distinguishable correlation between traffic volumes through the 14th and 15th Avenue Gates and the estimated vehicle trip generation for each alternative in the Draft SEIS. This is due to the assumption that traffic traveling to and from other parts of the Presidio would travel through the PHSH district to reach other Presidio destinations, and that some traffic generated by the PHSH project would use Battery Caulfield Road to travel to other parts of the Presidio or to and from other gates. In response to concerns about cut-through traffic on Battery Caulfield Road, more restrictive traffic calming measures will be incorporated into the project. The assignment of traffic to area roadways has therefore been modified to reflect the greater constraint (see Response to Comment TR-17). The Final SEIS reflects this change in traffic assignment, while also conservatively

assuming that some traffic not related to the PHSH alternatives will continue to pass through the 14th and 15th Avenue Gates.

In addition, the Trust has reevaluated the trip generation rates used for the Requested No Action Alternative and modified the trip generation rate for the preschool use to more closely reflect the City Guidelines trip generation rate and the actual traffic counts gathered at the project site during this time period (see Response to Comment TR-6). These changes are reflected in travel demand estimates as well as the subsequent traffic analysis in the Final SEIS.

TR-16. ***Cut-Through Traffic***

The CCSF and NAPP requested that a more thorough analysis of cut-through traffic and the importance of cut-through traffic volumes be discussed relative to the traffic patterns generated by each alternative.

Response TR-16 – In response to the request for a more thorough analysis of cut-through traffic, peak period traffic counts were collected at the intersection of 15th Avenue/Wedemeyer Street on January 12, 2005. Traffic count data indicate that approximately 59 AM peak hour vehicles and 83 PM peak hour vehicles were traveling through the 15th Avenue Gate but not traveling to or from uses on the lower plateau of the PHSH district. Traffic counts from October 2005 suggest that the trips through the 14th and 15th Avenue Gates that are not generated by uses on the lower plateau could number as many as 80 in the AM peak hour and 120 in the PM peak hour. In response to concerns about cut-through traffic on Battery Caulfield Road, more restrictive traffic calming measures will be incorporated into the project so that traffic bound for the Golden Gate Bridge or other parts of the Presidio (e.g., Fort Scott) will be discouraged from using Battery Caulfield Road. The more restrictive traffic calming measures are reflected in the revised traffic analysis. Assumptions regarding the amount of traffic traveling through the gates and not associated with any of the PHSH alternatives have been added to the SEIS (see Table 15 in Section 3.2.2.3, Gate Volumes and Cut-Through Traffic).

TR-17. ***Battery Caulfield Road***

One individual took issue with the proposed restriction of access on Battery Caulfield Road, arguing that Battery Caulfield Road provides a good internal connection with the rest of the Presidio and suggesting that it be kept open for emergency services and secondary access to the PHSH district. Other individuals disagreed, however, and suggested that Battery Caulfield Road be closed as a through road or at most allow very limited access. A couple of individuals requested that the Draft SEIS provide details about the proposed method to discourage through traffic on Battery Caulfield Road. Another individual suggested that if the road were not closed, traffic calming devices such as a series of speed humps should be installed in order to ensure safety of the quail in this area. One individual asked about the impact of project-generated traffic on pedestrian and bicyclist safety within the Presidio.

Response TR-17 – The Trust recognizes the value of retaining Battery Caulfield Road as a secondary access to the PHSH district, especially for the PresidiGo shuttle and emergency vehicles. The Trust

agrees with commenters that measures should be incorporated into the project to slow vehicles and minimize traffic volume in the interest of safety. Traffic calming measures will be provided in the lower plateau and Battery Caulfield to discourage traffic cutting through to and from the Golden Gate Bridge. Such measures may include, but would not be limited to, speed tables/raised crosswalks, diverters, and roadway narrowings. In order to reflect the restrictive nature of these traffic calming measures, the traffic analysis in the Final SEIS has been revised to reflect the use of Battery Caulfield Road by fewer motorists traveling to and from other parts of the park or the Golden Gate Bridge.

TR-18. ***Understated Traffic Impacts***

The Lake Street Residents Association suggested that the Draft SEIS underestimates traffic impacts. One individual suggested that the traffic impacts associated with ancillary "convenience stores" and other amenities were not considered.

Response TR-18 – The traffic impacts analysis for the PHSH alternatives uses a methodology that is generally consistent with the San Francisco Guidelines for Environmental Review, although some adjustments were made to reflect the Presidio's unique geographic location and transit service. The trip generation rates are generally consistent with those used by the CCSF, with the exception of the PM peak hour rate for residential uses (see Response to Comment TR-7). In the traffic analysis of future (year 2025) conditions, these travel demand assumptions for the four alternatives were combined with the growth in traffic volumes associated with regional trends in population and employment. The traffic analysis in the Final SEIS projects traffic volumes for 2025 that are consistent with the average annual growth in traffic volumes from model runs completed for the 2030 traffic analysis in the Doyle Drive Project EIS/EIR.

TR-19. ***Contribution to Cumulative Traffic Effects***

The CCSF suggested that the SEIS incorrectly evaluates cumulative impacts. The CCSF indicated that determining that cumulative impacts would occur without the proposed project is "not the appropriate inquiry for assessing cumulative impacts," and suggested that instead the SEIS simply determine whether the proposed project would contribute to any cumulative impacts and then provide data about the project's precise contribution.

The CCSF also requested more information about the project's contribution to poor intersection operating conditions at the intersection of Park Presidio Boulevard/California Street, and asserted that the project's contribution to poor operating conditions on California Street would "differ greatly" from its contribution to poor operating conditions on Park Presidio Boulevard due to the different capacities of these two roadways. The CCSF asserted that the Draft SEIS statement about all Presidio traffic contributing less than two percent to the traffic volume at this intersection masks the analysis, thereby hindering the public's evaluation, and is not relevant to the alternatives analyzed as part of the PHSH Draft SEIS. RPN stated that the cumulative transportation analysis "appears intended to mask project-related impacts."

Response TR-19 – The Draft SEIS provided information about the project's contribution to total cumulative traffic volume at the Park Presidio Boulevard/California Street intersection, as this intersection was forecast to operate at an unacceptable level of service (LOS E) in the PM peak hour in 2020. This particular intersection is not forecast to operate at LOS E or F in either peak hour in 2025. However, for the intersections that are expected to operate at LOS E or F in 2025, information about the PHSH project's contribution to the *growth* in intersection traffic volumes has been added to the Final SEIS.

TR-20. ***Cumulative Traffic Forecast Assumptions***

The CCSF inquired about the assumptions used to project cumulative traffic growth. One commenter questioned the underlying population and employment growth assumptions used to describe the projected increase in traffic volumes between now and 2020, and argued that the San Francisco County Transportation Authority projects a population decline in the area. The same commenter also suggested that the SEIS should be revised to provide a detailed explanation of local sources of delay caused by other Presidio projects. The commenter also questioned the intersection analysis methodology and how such high delay could be projected at the intersections of Lake Street/14th Avenue and Lake Street/15th Avenue where 14th and 15th Avenues would only carry one-way traffic.

Response TR-20 – The assumed cumulative growth in traffic volumes is based on two elements: 1) land use changes in the PHSH district and remainder of the Presidio, and 2) regional growth in population and employment in San Francisco and the rest of the Bay Area. The translation of regional population and employment growth into increases in traffic volumes was derived from the San Francisco County Transportation Authority (SFCTA) Travel Demand Model runs completed for the Doyle Drive EIR/EIS. The difference between volumes for the year 2000 and volumes for the year 2030 was converted to an average annual growth rate that was applied to 2005 traffic counts to yield 2025 traffic volumes. Traffic volumes generated by other uses in the Presidio (as estimated in the PTMP EIS) and PHSH project volumes were added to these baseline 2025 volumes to estimate future peak hour traffic volumes for each alternative. The resulting cumulative traffic volumes were also compared to the future traffic volumes used in the Doyle Drive Study to ensure consistency with that study**.**

Although the 14th and 15th Avenue Gates would operate as a one-way couplet, 14th and 15th Avenues would carry two-way traffic south of the gates, and therefore both the Lake Street/14th Avenue and Lake Street/15th Avenue intersections would have two-way traffic on both the southbound and northbound approaches. Although the one-way couplet traffic circulation through the gates would somewhat improve operation of the Lake Street/15th Avenue intersection (see Mitigation Measure TR-28), traffic delays at this intersection and the Lake Street/14th Avenue intersection would not improve dramatically. This is due to the two-way traffic flow that would remain on 14th and 15th Avenues approaching the Lake Street/14th Avenue and Lake Street/15th Avenue intersections, and the cumulative growth in traffic volumes in the area.

TR-21. ***Impact of Additional Traffic on City Resources***

The CCSF suggested that San Francisco's Police Department, Department of Parking and Traffic, and Planning Department will need to address any increase in public safety problems in the adjacent area related to the increase in traffic traveling to and from the project site, including traffic-related complaints, traffic accidents, and enforcement needs.

Response TR-21 – The CCSF is correct in noting that City agencies will be responsible for enforcement activities and responding to concerns about traffic safety within San Francisco. Similarly, the United States Park Police (funded by the Trust) and staff of the Trust (in Area B) and NPS (in Area A) have those responsibilities within the Presidio. It is estimated that approximately 50 percent of the traffic traveling through the Lombard and Presidio Boulevard Gates and 23 percent of the traffic entering the 25th Avenue Gate does not begin or end in the Presidio.

TR-22. ***Construction Traffic Management Plan***

The CCSF noted that the SEIS does not provide specific information on construction routes, timing, and possible impacts of the rerouting of traffic during construction. The CCSF asked who would be responsible for drafting, implementing, and monitoring a Construction Traffic Management Plan. One individual asserted that such information needs to be included in the SEIS. The GGBHTD requested that, in lieu of inclusion of construction truck routes in the Final SEIS, the GGBHTD be consulted during development the Construction Traffic Management Plan.

Response TR-22 – The project developer will be responsible for developing a Construction Traffic Management Plan in cooperation with the Trust, and the Trust will review the plan and monitor construction traffic for conformance to the plan. The Trust will consult with the GGBHTD during development and review of the Construction Traffic Management Plan.

TR-23. ***Variance in Construction Traffic Impacts***

The PHRA noted that the impact of construction activities (in both duration of activities and truck trips) on city neighborhoods varies dramatically among the different alternatives.

Response TR-23 – The differences in duration of construction and construction-related traffic among the PHSH alternatives are based on the differences in amount of soil to be excavated, which is largely based on whether an underground parking garage is included, whether the building wings are removed or retained, and how much new construction and demolition is planned. For example, because Alternative 2 includes underground parking, demolition, and new construction, it would generate the greatest average number of daily truck trips. Alternative 1 would have no demolition and no new construction, and therefore would generate the least number of average daily truck trips aside from the Requested No Action Alternative. Alternatives 3 and 4 would include demolition, and in the case of Alternative 4, new construction, but because neither alternative would include underground parking, the number of truck trips would be somewhat smaller than that estimated for Alternative 2. The Final SEIS has been revised

to include the provision of an underground parking garage as a determinant in the demolition and construction activities (see Table 18).

TR-24. ***Transportation Demand Management***

SPUR noted that the Park Presidio Boulevard Access Variant "could significantly alleviate the concerns of the residents on Lake Street and adjoining areas." SPUR also suggested a number of other transportation demand management options, including 1) upgrading nearby transit stops with high-quality shelters and "NextBus" information, 2) enhancing PresidiGo shuttle service and considering partnering with other shuttles, 3) providing for City Carshare programs and creating incentives for carshare and transit use, and 4) extending "N" residential permit parking several blocks in the surrounding neighborhood while deed-restricting PHSH tenants from purchasing residential parking permits. The San Francisco Bicycle Coalition requested that the project include safe and secure bicycle parking, including racks for visitors and a limited-access storage room for residents. One individual recommended working with the CCSF to provide more comprehensive, integrated public transit service to and through the Presidio, including express bus or light rail from downtown to the various Presidio gates. One commenter suggested addressing parking and traffic issues by providing intercept parking lots, from which residents and visitors would reach their destinations by bus, rail, or gondola. The same commenter suggested a gondola as a fun, useful, and unique feature that would serve as a tourist attraction as well as a commute option.

RPN and some individuals suggested that unless the transportation demand management (TDM) program elements are made mandatory by being written into the contract with the developer, apartment management contracts, and resident leases, the TDM program will not be effective, and assuming the program will be effective potentially masks significant adverse traffic impacts.

Response TR-24 – Under the Preferred Alternative, the PHSH district will include a number of the transportation demand management strategies suggested by SPUR. The site will include a City CarShare "pod" for use by residents. Residents' payments for parking will also be separate from their rent payments in order to reinforce the out-of-pocket expense of car ownership. The Trust's private development partner, if selected, has volunteered to assist residents in the adjacent neighborhood in expanding the "N" residential parking permit zone to protect neighborhood residents from spillover parking effects. The development partner has also agreed to partially subsidize residents' MUNI Fast Passes to encourage the use of transit, and will provide a secure bicycle parking area within the underground garage.

The Trust has an ongoing commitment to improve PresidiGo service and PresidiGo service connections to MUNI and GGT. The Trust also plans to continue working with MUNI to provide efficient transit service to the Presidio, and hopes that MUNI's recent funding for expansion of the automatic tracking NextBus system will further advance this effort.

TR-25. ***Transportation Demand Management Actions***

The GGBTHD noted that the website with a section dedicated to information on transportation and commute alternative referenced in Section 2.2.5 does not include updated information on GGT routes and does not indicate the Golden Gate Bridge Toll Plaza as a transfer point between GGT routes and PresidiGo.

Response TR-25 – The GGT information on the Presidio website has now been updated. The website now identifies the toll plaza as a transfer point to PresidiGo, with a link to PresidiGo schedule information. In order to ensure that the information remains up-to-date, a link to the GGBHTD website directs web users to the most current information on route schedules.

TR-26. ***Feasibility of Mitigation Measures***

RPN asserted that mitigation measures that lack a practical possibility of implementation do not reasonably meet the mitigation requirements of an environmental evaluation. RPN noted that some of the traffic mitigation measures identified in the Draft SEIS would require CCSF approval, and that the SEIS should demonstrate that the CCSF is likely to approve such measures. The CCSF asserted that in accordance with the NEPA, the SEIS must discuss the probability and feasibility of mitigation measures that are outside the jurisdiction of the Trust, and commented that although the SEIS analyzes a new intersection on Park Presidio Boulevard north of Lake Street as a variant, it does not provide information on the likelihood of the variant being constructed. The Pacific Heights Residents Association asserted that the Trust must work cooperatively with the CCSF to implement traffic mitigation measures, and went on to suggest that the Park Presidio Boulevard Access Variant is as important to the PHSH as access from Doyle Drive is to the Letterman Digital Arts campus.

RPN also suggested that the mitigation measure for the intersection of Park Presidio Boulevard/Lake Street would require an additional lane to be built on San Francisco Parks and Recreation land, stated that the feasibility of proposed mitigation measures to mitigate adverse traffic impacts has not been adequately studied, and suggested that proposed right-turn restrictions "will only mean that traffic will be going around in circles, only to end up and increase traffic on Lake Street." One individual suggested that traffic mitigation measures should be in place before development begins.

Response TR-26 – Both the Draft and Final SEIS include a number of transportation mitigation measures that are within the CCSF's jurisdiction, including right-turn-only restrictions at two two-way stop-controlled intersections. The commenters are correct in noting that the SEIS must discuss the feasibility of mitigation measures outside the Trust's jurisdiction. The right-turn-only restrictions could be easily implemented by the CCSF and, because the measures involve some additional signage and striping, they could be implemented at a relatively low cost. The turn restrictions at these intersections would not be dissimilar to the effective turn restrictions for 14th Avenue at Geary Boulevard. For mitigation of long delays on minor approaches to two-way stop-controlled intersections, the mitigation measures typically considered include signalization and all-way stop control. The turn restrictions were suggested as a mitigation measure because 1) the minor street peak hour traffic volumes were low enough that signal

warrants in accordance with the MUTCD and California Supplement would not be met, 2) all-way stop control at intersections of Lake Street/14th Avenue and California Street/14th Avenue could result in queues extending into the adjacent intersections on Park Presidio Boulevard, and 3) in comments on the PTMP SEIS, the CCSF expressed a reluctance to install traffic signals at some of these intersections. The Trust realizes that such mitigation measures are within the CCSF's jurisdiction and will continue to work with the San Francisco Department of Parking and Traffic (SFDPT) to develop appropriate and acceptable mitigation measures. SFDPT has indicated that they believe the HCM intersection analysis in the Draft SEIS methodology overestimates traffic impacts. If the SEIS analysis overestimates impacts, it is possible that unacceptable levels of service identified in the analysis may never occur. The Trust will work with the CCSF to either implement the turn restrictions or study further, as needed.

Unlike the Doyle Drive access to the Letterman Digital Arts Center, the Park Presidio Boulevard Access Variant is not considered a mitigation measure, because it would not improve the level of service from LOS E or F to LOS D or better at any study intersections at which there would be a significant effect.

All mitigation measures will be implemented before unacceptable conditions occur. As the project site approaches full occupancy, intersections expected to require mitigation will be monitored to determine the appropriate time to implement the measures. The Trust will coordinate with the CCSF in this effort.

TR-27. ***Financial Contribution to Mitigation Measures***

The CCSF criticized the SEIS for referring to a number of mitigation measures outside the Trust's jurisdiction without any discussion of how the Trust will contribute its fair share of the cost of the mitigation measures. The CCSF also noted that the transit mitigation measures discussed in the SEIS include monitoring of transit demand, but contain no standards for triggering additional service increases, nor any method for the Trust to contribute its fair share to such increases. The CCSF suggested that these mitigation measures are inadequate under the NEPA, as they do not provide the public with any method to measure impacts or to assess the probable timing of necessary service increases.

Response TR-27 – Transit Mitigation Measures TR-10 and TR-25 from the PTMP EIS are also included in the SEIS, and include supporting increased frequencies on transit service if monitoring reveals insufficient capacity with the service levels scheduled at the time of monitoring. The Trust would coordinate with the CCSF and/or the GGBTHD to determine the contribution of each party to the cost of the mitigation measures.

TR-28. ***Transit Monitoring and Mitigation Measures***

The EPA suggested that because of the future forecasted transit capacity problems, it is especially "important to monitor this capacity on a regular basis and continue close coordination with transit authorities in order to implement mitigation measures." The GGBTHD requested more details about the monitoring of GGT routes described in Mitigation Measures TR-10 and TR-25, including who will perform the monitoring, what information will be gathered, and how often monitoring will occur.

Response TR-28 – The Trust will continue to monitor transit passenger loads in the Presidio. The location of monitoring will vary by the transit route/line being monitored. GGT routes will likely be monitored by transportation department staff at Richardson Avenue, at the Golden Gate Bridge Toll Plaza, or at Park Presidio Boulevard. Frequency of monitoring will depend on the general degree of occupancy of Presidio buildings in the area. Transit ridership information is also gathered from Presidio employees and residents through Presidio employee and resident surveys. Also see Response to Comment TR-10.

TR-29. ***Readability of SEIS***

The CCSF commented that it was difficult to sort through the traffic analysis and get a clear assessment of the data being reported, and made specific suggestions about how to incorporate existing plus project data to make the intersection LOS tables more understandable. The CCSF and some individuals also suggested that Table 13, which compares traffic volumes at the 14th/15th Avenue Gates under the various alternatives, also separately list the existing volumes at the 14th and 15th Avenue Gates in order to show the changes in volume on each street under the various alternatives, and that project-generated traffic be shown separately from cumulative growth traffic and cut-through traffic. One individual commented that the traffic section of the SEIS was "vague, lacking in substance and sometimes simply unrealistic." Another individual stated that "the data that underlie the trip generation numbers presented in the SEIS does not allow one to calculate the numbers that are presented in the SEIS."

Response TR-29 – The Final SEIS has been revised to describe more clearly the incremental results of each step of the analysis methodology, including trip generation rates, internal and external splits, modal splits, trip linking, and trip distribution (see Appendix B). The existing (2005) gate volumes have been added to Table 15 for reference. Table 15 also now shows traffic not generated by the alternatives and expected to travel through the gates. The existing plus project analysis has been updated to reflect the 2005 traffic counts and transit data as well as the revised trip generation rate for preschool use (see Response to Comment TR-6). However, the analysis has not been incorporated into the main body of the SEIS, but instead is provided in Response to Comment TR-30 and Appendix B.

TR-30. ***Existing plus Project Analysis***

The CCSF requested that the transportation analysis clearly show the project-specific impacts and how much traffic is attributable to the project, and that the existing plus project analysis be included in the main body of the SEIS rather than the response to comments. The CCSF noted that the CCSF regularly and methodically uses the Existing plus Project analysis as a method to clearly show project-specific impacts.

Response TR-30 – The Existing plus Project analysis previously included in the responses to comments in the Draft SEIS has been updated and included below for informational purposes. An "existing plus project" scenario is by definition an artificial construct, because it assumes that a project can be constructed overnight and does not make allowances for traffic growth or other changes likely to occur in

the time it takes to plan, design, approve, and implement a project – usually several years or more. For this reason, the analysis presented in Section 3 assesses the PHSH alternatives at a specific point in time (2025). By comparing Alternatives 1 through 4 to the Requested No Action Alternative in 2025, it is possible to discern the project-specific impacts of each alternative. Also, by comparing the alternatives in 2025 to the existing conditions described in the affected environment section, it is possible to discern the cumulative impacts to which the PHSH project would contribute, and to compare the relative impacts, with project contributions under Alternatives 1 through 4, to impacts if the project does not proceed (represented by the Requested No Action Alternative).

Although not required to discern project impacts, an existing plus project analysis is presented below to allow the reader to compare existing conditions to existing plus project conditions.[9] As shown in Table 6, all of the study intersections would operate at the same level of service as with existing conditions in the AM peak hour except the intersections of Lake Street/14th Avenue and California Street/14th Avenue. Under all alternatives, the minor approach(es) to the two-way stop-controlled intersections of Lake Street/14th Avenue and California Street/14th Avenue would operate at LOS E or F rather than LOS C or D, with the exception of Lake Street/14th Avenue with the Park Presidio Boulevard Access Variant; with the variant, the stop-controlled approaches at this intersection would operate at LOS D under all alternatives.

Similarly, as shown in Table 7, four of the eight study intersections would operate at the same acceptable levels of service as with existing conditions in the PM peak hour under all four alternatives. An additional two intersections (Lake Street/15th Avenue and Lake Street/Park Presidio Boulevard) would operate at the same levels of service as with existing conditions under all alternatives except Alternative 1, where existing LOS B conditions would fall to LOS C conditions at both intersections (with the couplet). Under all alternatives, the minor approach(es) to the two-way stop-controlled intersection of Lake Street/14th Avenue would fall from LOS D to LOS E or F, and the minor approach(es) to the two-way stop-controlled intersection of California Street/14th Avenue would either continue operating at LOS E (Alternatives 2, 3, and 4 with the Park Presidio Boulevard Access Variant) or fall from LOS E to LOS F.

In summary, when traffic volumes generated by the PHSH alternatives are added to existing conditions, no new potentially significant impacts (i.e., LOS E or F conditions) would occur during the AM or PM peak hour, beyond the significant impacts already identified in the cumulative analysis at the two-way stop-controlled intersections of Lake Street/14th Avenue and California Street/14th Avenue. Any impacts at the intersections of Lake Street/14th Avenue and California Street/14th Avenue could be addressed by mitigation measures included in Section 3.

[9] A more detailed discussion of the analysis is available in Appendix B (Memo No. 4).

Table 6. Existing + Project Conditions – AM Peak Hour

				One-Way Couplet At 14th & 15th Ave. Gates								Variant: New Park Presidio Blvd. Access With Inbound Only Traffic At 14th And 15th Ave. Gates							
		Existing Conditions		Alt. 1		Alt. 2		Alt. 3		Alt. 4		Alt. 1		Alt. 2		Alt. 3		Alt. 4	
Intersection	Traffic Control Device	Delay[a]	LOS	Delay[a]	LOS	Delay[a]	LOS	Delay[a]	LOS	Delay[a]	LOS	Delay[a]	LOS	Delay[a]	LOS	Delay[a]	LOS	Delay[a]	LOS
Lake Street/15th Avenue	4-Way Stop	17.2	C	22.3	C	19.2	C	19.1	C	18.0	C	18.0	C	16.5	C	16.1	C	16.0	C
Lake Street/14th Avenue[b]	2-Way Stop	21.4	C	**>50**	**F**	**48.6**	**E**	**41.4**	**E**	**37.3**	**E**	34.7	D	27.1	D	26.5	D	26.0	D
Lake Street/Park Presidio Boulevard	Traffic Signal	16.4	B	17.3	B	16.8	B	16.8	B	16.7	B	14.8	B	14.5	B	14.5	B	14.3	B
California Street/15th Avenue[b]	2-Way Stop	20.8	C	18.0	C	18.2	C	18.0	C	18.4	C	24.2	C	22.8	C	22.5	C	22.3	C
California Street/14th Avenue[b]	2-Way Stop	29.9	D	**49.4**	**E**	**38.5**	**E**	**36.6**	**E**	**36.0**	**E**	**52.9**	**F**	**44.0**	**E**	**43.6**	**E**	**41.8**	**E**
California Street/Park Presidio Boulevard	Traffic Signal	16.2	B	16.3	B	16.3	B	16.2	B	16.2	B	16.4	B	16.3	B	16.4	B	16.3	B
Lake Street/17th Avenue[b]	2-Way Stop	17.5	C	18.3	C	17.9	C	17.8	C	17.7	C	18.1	C	17.7	C	17.7	C	17.6	C
Lake Street/Funston Avenue[b]	2-Way Stop	16.9	C	18.0	C	17.5	C	17.4	C	17.3	C	19.8	C	19.4	C	19.3	C	19.2	C
New Alternative Access/Park Presidio Boulevard												4.8	A	4.4	A	4.4	A	4.3	A

Source: Wilbur Smith Associates 2006d.
Notes:
[a] Delay presented in seconds per vehicle based on the Highway Capacity Manual (HCM) 2000 methodology.
[b] LOS and delay are shown for the worst minor stop-controlled approach. Major approach is uncontrolled and without delay.
LOS = level of service

Table 7. Existing + Project Conditions – PM Peak Hour

				One-Way Couplet at 14th & 15th Ave. Gates								Variant: New Park Presidio Blvd. Access with Inbound Only Traffic at 14th and 15th Ave. Gates							
		Existing Conditions		ALT. 1		ALT. 2		ALT. 3		ALT. 4		ALT. 1		ALT. 2		ALT. 3		ALT. 4	
Intersection	Traffic Control Device	Delay[a]	LOS	Delay[a]	LOS	Delay[a]	LOS	Delay[a]	LOS	Delay[a]	LOS	Delay[a]	LOS	Delay[a]	LOS	Delay[a]	LOS	Delay[a]	LOS
Lake Street/15th Avenue	4-Way Stop	13.1	B	18.1	C	13.7	B	13.5	B	13.2	B	14.0	B	12.8	B	12.7	B	12.6	B
Lake Street/14th Avenue[b]	2-Way Stop	30.5	D	**>50**	**F**	**>50**	**F**	**>50**	**F**	**46.2**	**E**	**46.2**	**E**	**36.4**	**E**	**36.1**	**E**	**35.2**	**E**
Lake Street/Park Presidio Boulevard	Traffic Signal	18.4	B	22.0	C	19.2	B	19.2	B	18.9	B	19.0	B	17.9	B	17.8	B	18.0	B
California Street/15th Avenue[b]	2-Way Stop	20.2	C	20.7	C	19.2	C	19.4	C	19.4	C	24.2	C	22.1	C	22.2	C	21.8	C
California Street/14th Avenue[b]	2-Way Stop	**38.9**	**E**	**>50**	**F**	**>50**	**F**	**>50**	**F**	**>50**	**F**	**>50**	**F**	**41.4**	**E**	**41.4**	**E**	**40.1**	**E**
California Street/Park Presidio Boulevard	Traffic Signal	22.2	C	22.3	C	22.3	C	22.3	C	22.3	C	22.8	C	20.9	C	20.7	C	20.6	C
Lake Street/17th Avenue[b]	2-Way Stop	16.7	C	17.9	C	17.1	C	17.1	C	17.0	C	17.7	C	16.9	C	16.9	C	16.8	C
Lake Street/Funston Avenue[b]	2-Way Stop	15.9	C	17.7	C	16.6	C	16.6	C	16.5	C	18.8	C	18.3	C	18.3	C	18.2	C
New Alternative Access/Park Presidio Boulevard												14.9	B	6.2	A	5.6	A	5.8	A

Source: Wilbur Smith Associates 2006d.

Notes:

[a] Delay presented in seconds per vehicle based on the Highway Capacity Manual (HCM) 2000 methodology.

[b] LOS and delay are shown for the worst minor stop-controlled approach. Major approach is uncontrolled and without delay.

LOS = level of service

TR-31. ***Estimated Traffic Generated by Former Hospital***

RPN suggested that applying current trip generation rates to the former hospital use results in trip generation estimates for the hospital that are unreliable. RPN stated that anecdotal evidence from long-term residents of the neighborhood calls the hypothetical analysis into question, and speculates that the nursing staff of the hospital would have relied heavily on public transportation in the 1950s to 1970s. RPN went on to say that "an SEIS should not include such unreliable data as it calls into question the integrity of the report." Several individuals agreed, suggesting that the traffic estimated to be possibly generated by the hospital when it was operational did not reflect actual conditions during that time. One commenter noted that from the mid-1960s to the mid-1970s, children were able to play in the street without concerns of car traffic, which would not be possible with the vehicle trip generation estimated in the Draft SEIS. Commenters also noted that when the hospital was operational, other conditions affecting the traffic through the gates were different: 1) cut-through traffic through the PHSH district was much more restricted, 2) more people used transit to travel to and from the project site, and 3) automobile ownership and use were lower than today. The CCSF also suggested that the estimate of traffic that could have been generated by the hospital at the project site several years ago is misleading, irrelevant, and likely inaccurate. However, one individual disagreed with the notion, and noted that there were many people in the PHSH complex in the World War II era, and that heavy activity in the PHSH district was normal in the past.

Response TR-31 – In 1970, the PHSH had an average monthly inpatient load of 425 and the annual outpatient visits totaled 122,700, for an average daily outpatient load of about 336 patients. The PHSH employed nearly 1,000 people, including 100 physicians (Thompson 1997). Although translating this level of occupancy and activity level to trips to and from the project site is somewhat speculative, the patient and staff levels described above suggest that the PHSH district was a bustling area. The estimates of traffic that would be generated by this level of occupancy is provided only for the purpose of establishing historical context regarding general activity level in the district.

TR-32. ***Traffic Generated by Recent PHSH District Uses***

The CCSF requested a better description of recent occupancy (e.g., Chinese-American School and JCC) of the project site and the correlation between those activities and the cited 15th Avenue Gate traffic count data.

Response TR-32 – Tables 8 and 9 below describe the recent occupancy of the project site and traffic counts at the 15th Avenue Gate that correlate to occupancy of the site by these tenants. Much of the traffic count data were gathered when the project site was vacant for the purposes of establishing existing conditions prior to planning studies for the Presidio overall and for the project site. Some traffic data were collected when the JCC was at the site. The more recent counts include Arion Press, Lone Mountain Children's Center, and a small amount of office use occupying the upper floor of Building 1806.

Table 8. Recent Tenants of the PHSH District and History of Collected Traffic Count Data

DATES OF OCCUPANCY	RECENT TENANTS OF THE PHSH	TRAFFIC DATA COLLECTED
9/3/96 to 1/31/98	Chinese-American International School (Building 1808)	
1/31/98 to 12/14/00	vacant	May and November 1998 May 11, 1999 May 18, 2000 November 30, 2000
12/14/00 to 2/5/01	JCC (Buildings 1808, 1805, and 1803)	
2/5/01 to 8/1/01	JCC (Buildings 1808, 1805, and 1803) Arion Press (Building 1802)	
8/1/01 to 6/21/03	JCC (Buildings 1808, 1805, and 1803) Arion Press (Building 1802) Lone Mountain Children's Center (Building 1806)	September 25, 2001 October 2002
6/21/03 to 12/31/03	JCC (Buildings 1808, 1805, and 1803) Arion Press (Building 1802) Lone Mountain Children's Center (Building 1806) Office (Building 1806)	September 25, 2001
12/31/03 to current	Arion Press (Building 1802) Lone Mountain Children's Center (Building 1806) Office (Building 1806)	January 12, 2005 October 20, 2005

Source: Presidio Trust, 2006.
Note:
JCC = Jewish Community Center

Table 9. Traffic Count Data at 15th Avenue Gate

DATE OF TRAFFIC COUNTS	TENANTS	AM PEAK HOUR	PM PEAK HOUR	WEEKDAY DAILY
May 18-20, 1998	vacant	NA	82	864
August 4-7, 1998	vacant	NA	75	783
November 16-20, 1998	vacant	NA	93	920
May 11, 1999	vacant	87	72	NA
May 18, 2000	vacant	107	97	V
November 30, 2000	vacant	NA	93	NA
September 25, 2001	JCC Arion Press Lone Mountain	147	NA	NA
October, 2002	JCC Arion Press Lone Mountain	NA	187	1,958
January 12, 2005	Arion Press Lone Mountain Office	105	96	NA
October 20, 2005	Arion Press Lone Mountain Office	136	134	NA

Source: Presidio Trust.
Notes:
NA = not available
JCC = Jewish Community Center

TR-33. ***Transit Concerns***

One individual asked how many bus passengers the project would generate and whether MUNI would add additional bus capacity to accommodate any overcrowding caused by the project. This individual suggested that if the number of project-generated transit passengers should warrant increased capacity, the SEIS should analyze the air quality and noise effects associated with additional buses (if diesel). The CCSF raised several issues about the transit impact analysis and the project's encouragement of transit use over automobile use. Specifically, the CCSF noted that:

- If service location of the 1-California MUNI line is seen as inadequate, the Trust must pay for any relocation or extension of service closer to the development.

- Depending on the number of units, the 1-California MUNI line may need more service, and the SEIS suggests that no new funding would be made available as part of the project.

- The potential for increased auto congestion interfering with the 1-California MUNI line should be considered, based on the expected volumes of auto traffic.

- Pedestrian access to transit should be encouraged and auto use should be discouraged in order to "alleviate ever-increasing congestion."

- Increasing auto volumes on residential streets to the point where the street would require signalization, dedicated turn lanes, or multiple lanes is a policy matter that should be seriously considered and discussed with the CCSF and the neighbors.

- If the project makes minimal effort to encourage transit over car use, then the project does not help further the MTA's overall traffic and transit goals and should therefore be asked to fully mitigate every auto and transit impact.

Response TR-33 – The 1-, 1AX-, and 1BX-California MUNI routes are considered perfectly adequate in their existing configuration to serve the project site. The Trust sees no need or justification to relocate the route(s) to improve proximity to the project site at the expense of other parts of the Richmond district. Alternative 2 has been revised in the Final SEIS to provide a maximum of 230 dwelling units compared to the 350 units included in Alternative 2 in the Draft SEIS. This has resulted in an estimated 16- to 20-percent decrease in projected peak hour transit trips generated by the alternative. However, if MUNI does not increase service frequencies beyond current levels, the PHSH district could contribute to cumulative passenger loads that would exceed capacity. Mitigation Measures TR-10 and TR-25 include supporting increased frequency for transit service as needed. The PHSH alternatives would add traffic to California Street; however, based on the level of service results, the alternatives are not expected to add an amount of traffic that would substantially affect the operation of vehicular traffic (including transit vehicles) at the intersections. Mitigation measures for cumulative traffic and transit impacts are identified in the Final SEIS.

As discussed in Response to Comment TR-9, the Trust's private development partner, if selected, has agreed to implement a number of transportation demand management (TDM) measures that would support and encourage transit ridership. The Trust's TDM program also includes measures to support transit ridership.

TR- 34. ***Clarifications and Editorial Comments***

The CCSF requested several clarifications, more detailed descriptions, and explanations. Specifically, commenters requested:

- A discussion of the history of the 14th Avenue Gate and its closure to vehicular traffic;
- Description of the service hours of the MUNI express routes on California Street;
- Specificity in naming intersections that would or would not operate at LOS D or better;

- Clarification of footnotes;
- Clearer indication of analysis year in all tables;
- Discussion of project's contribution to increases in transit ridership;
- Clarification of whether pedestrian and bicycle trips are internal to the Presidio or external;
- Origin of parking turnover rates for particular land use types;
- Comparison of future parking demand and supply by alternative to the number of existing parking spaces;
- Clearer discussion of cumulative impacts;
- Clearer distinction of mitigation measures and any inclusion in definition of alternatives;
- Explanation of why modified signal timing was only applied with the Park Presidio Boulevard Access Variant; and
- Indication of whether the 14th Avenue Gate would be opened before or during project construction or after construction activities are complete.

Response TR-34 – To the extent possible, the Final SEIS has been revised to address the above comments.

1.9 HISTORIC RESOURCES (HR)

HR-1. *Lowering of Building 1801 Wings*

The NPS was concerned that the proposal in Alternative 2 to lower the non-historic wings of Building 1801 would result in a hybrid of the historic structure and the 1950s additions that would "cloud the historicity of the building and the historic structure of the district by adding one more overlay that diminishes the overall feeling, association and setting of the NHLD character-defining features." They asserted that the treatment does not conform with guidance for rehabilitation projects provided in the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Structures, which recommends recovering important character-defining elements. They believed that, in order to meet the spirit of the Secretary of the Interior's Standards, the wings should either remain as part of the changes made to the building through time or be removed to recapture an important character-defining element of the building.

SPUR voiced an interest in a more forward-looking treatment of the non-historic wings of Building 1801, possibly expressing contemporary ideas about ecological building, while also conforming to Secretary of the Interior's Standards for visually distinguishing historic and non-historic building elements. An individual offered his opinion that the removal of the top two floors of the wings under Alternative 2 would disfigure the building, stating that "it seems architecturally illogical to have 4-floor wings

protruding from a 6-floor main building." The same individual also felt that consideration should be given to keeping the loggia because it may be "a convenience to persons entering/leaving the wings."

Response HR-1 – As stated in the earlier response to this comment (see Draft SEIS pages A-30 and A-31), it is the Trust's opinion that nothing in the Secretary of the Interior's Standards either requires the removal of non-historic building fabric or precludes improvements to non-historic elements intended to increase their compatibility. The Standards *do* prohibit changes that would create a false sense of historicity, and they require a systematic analysis of changes that have occurred on the building through time and that may have gained significance as part of the building's history. The Trust has determined that the 1950s wings of Building 1801 have not acquired such significance. However, any improvements to the non-historic portions of the building proposed in Alternatives 1 and 2 would be designed to avoid mimicking the historic style of the 1930s structure while providing some level of compatibility with the original structure.

Since the PHSH developer has proposed use of the federal historic tax credit, the alternative that is ultimately selected will be subject to detailed review by NPS staff in Washington, D.C. to ensure it remains entirely consistent with the Secretary of the Interior's Standards.

HR-2. *Removal of Building 1801 Wings*

RPN and others suggested that removal of the hospital wings as proposed in Alternative 3 would better preserve and rehabilitate the hospital building in accordance with its historic status. Although, as indicated in the Draft EIS, the Secretary of the Interior's Standards do not require removal of non-historic fabric, RPN stressed that the Trust is now provided the unique opportunity to "correct the bad decision of the 1950's decision makers before it is too late," and should "seize the opportunity" to remove the building's wings in keeping with the Trust's goal of preserving and restoring historic resources. One individual asserted that the renovation can only be termed "historical" if it returns the building to its original, grand structure.

Still others stated the issue more bluntly, proclaiming that the wings were "unsightly," "hideous," a "visual vulgarity," an "eyesore," or "aesthetic blight," to mention some of the less colorful ways they were described. A number of individuals warned that the Trust should not want the wings to be part of its "legacy." Many strongly suggested the wings should be removed in their entirety due to their significant, adverse impact on the environment, offering the following reasons:

1. They are grossly out of scale relative to their surroundings.

2. The 1950s era wings all but obliterate the historic architecture of the early 1930s-era main building.

3. The wings result in the over-development of the project site, i.e., an inappropriate, high-intense use.

Response HR-2 – The Trust appreciates the views of the commenters, and recognizes the beneficial visual effect that would be associated with removing the non-historic wings on the front of the hospital

building (See SEIS Section 3.7.2). The Trust's ultimate decision to select an alternative will weigh this beneficial effect with the economic needs of a proposed rehabilitation as well as other possible impacts and benefits.

HR-3. ***Demolition of Building 1801***

One individual stated "[i]f I had my way the hospital would be completely torn down along with the Wherry Housing to provide a true park experience..." Another said he did not "like the idea of any building on the spot." Still another strongly felt that the historic status of the building should be waived and the building demolished, arguing that 1) it was never intended to become a residential community, 2) it is haunted, 3) it is an "environmental disaster," 4) the land beneath it should be restored to natural habitat, and 5) the area surrounding it has a "huge mosquito problem."

Response HR-3 – Building 1801 is a contributing structure to the Presidio of San Francisco National Historic Landmark District (NHLD). The register eligibility of this building has been established and therefore cannot be waived. The Trust is subject to the requirements of the National Historic Preservation Act as well as the federal regulations that govern application of Section 106 of that Act. The Trust is required, to the maximum extent feasible, to undertake such planning as to minimize harm to the NHLD. Any plan to demolish Building 1801 would have to analyze such factors as the economic viability of building rehabilitation or establish overarching resource conflicts that require removal of this contributing structure to the NHLD.

The Trust has established that rehabilitation of Building 1801 is economically feasible. Building removal would therefore have to be predicated on establishment of other resource requirements that are of such an overarching importance as to outweigh the need to "minimize harm" to the NHLD.

HR-4. ***Interpretation of Nike Missile Facility and Marine Cemetery***

SPUR wished to acknowledge the important historic resources of the site, including the Nike Missile facility and the Marine Cemetery. "Enhanced interpretive programs would make their historic significance more accessible to residents and visitors alike, and would increase the quality of visitor experience at the Park as a whole." One individual preferred complete removal of Landfill 8 and restoration of the Marine Cemetery through the use of signage/markers/fencing to honor the cemetery and its occupants. The same individual also wanted to see the Nike Missile facility interpreted. At the public hearing held to receive public comment on the Draft SEIS for the project, the president of the Fort Point and Presidio Historical Association expressed gratitude to the Trust for its commitment to interpret the Nike Missile facility and conveyed that the Alameda County-based Nike Society is "ready, willing and able to proceed… with consulting on that interpretation."

Response HR-4 – The Trust appreciates the comment and plans to undertake the interpretation of resources described (see the last bullet in Section 2.1, Characteristics Shared by the Alternatives).

1.10 ARCHAEOLOGICAL RESOURCES (AR)

AR-1. *Potential Effect on Archaeological Resources*

The CCSF requested that the amount of excavation for the underground parking associated with Alternative 2 should be set out for a truer picture of the potential effects. "Without knowing if the excavation is 10 ft. by 10 ft. by 10 ft. or 100 ft. by 100 ft. by 100 ft., there is nothing to validate the characterization of the impact as slightly greater than the Requested No Action Alternative which does not have any excavation proposed at all."

Response AR-1 – As stated in Section 3.10.2 of the SEIS, excavation of the underground garage associated with Alternative 2 would require removal of about 10,000 cubic yards of excess soil, some of which could be reused elsewhere on the site for landscaping or other purposes. Because the garage would use existing basements of the non-historic wings, the only newly excavated area would lie between the foundations of the wings, outside of the area currently occupied by the one-story loggia proposed for removal. This undisturbed area is estimated at about 8,640 square feet. No significant archaeological resources are predicted in this area, and unanticipated finds would be addressed in a manner consistent with the Trust's Programmatic Agreement under Section 106 of the National Historic Preservation Act, and mitigation measures included in the SEIS (See Section 3.4.3).

1.11 AIR QUALITY AND NOISE (AQ)

AQ-1. *Estimates of Air Quality Impacts and Contaminants*

The CCSF maintained that because so much of the air quality analysis is tied to the levels of traffic predicted, the limitations of the SEIS traffic analysis will also lead to inaccurate estimates of air quality impacts and contaminants related to traffic.

Response AQ-1 – Revised traffic data including updated trip generation rates and existing traffic conditions reflecting October 2005 traffic counts, the most recent transit ridership information, and a planning horizon year of 2025 are used in the revised air quality analysis. The analysis of air quality impacts includes the Requested No Action Alternative and updated assumptions for other alternatives, including the Trust's revised Preferred Alternative (Alternative 2). The models used in the calculation of air quality impacts have also been updated (URBEMIS version 7.4.2 has been updated to version 8.7.0).

AQ-2. *Comparison of Carbon Monoxide (CO) Emissions*

The EPA desired to see the Bay Area Air Quality Management District (BAAQMD) recommended significance level of CO emissions per day included in the SEIS to allow comparison with the estimated weekday emissions of each alternative. They noted that the construction emissions are not expected to exceed 100 tons per year for these pollutants. The CCSF asked why there is no variation between the

one-hour and eight-hour average CO values among the alternatives and the alternatives with variants when Table 19 shows some substantial differences in pounds per day among the alternatives. The CCSF also asked what year the predicted values were for.

Response AQ-2 – The BAAQMD recommends using a threshold for CO of 550 pounds per day (lb/day) as a preliminary test of significance under the California Environmental Quality Act (CEQA). This is a trigger level for examining localized CO concentrations. Although none of the alternatives would exceed the 550 lb/day CO level, as shown by Table 19, the Draft SEIS included estimates of localized CO concentrations in Table 18, and the notes in Table 19 have been revised to show the threshold.

Localized one-hour CO values in Table 18 include the concentrations caused by the peak hour traffic through an intersection combined with the background ambient concentration. The bulk of the total CO concentration is dominated by the background concentration rather than the concentrations caused by local traffic. Variations in local traffic may add about 50 percent more than the background to the localized conditions, but this contribution does not vary substantially among alternatives. For most intersections, peak hour traffic does not vary more than 10 percent among alternatives. Because the level of peak hour traffic varies so little among alternatives, and because the local traffic is a minor component of the total CO relative to the background concentration, the total CO values do not vary notably among the alternatives. Regional CO emissions listed in Table 19 are based on daily traffic levels, which vary more than peak hour traffic.

The localized CO values in Table 18 are predicted for the traffic planning horizon year (revised from 2020 in the Draft SEIS to 2025), which is shown in the revised table.

AQ-3. *Mitigation of Construction Emissions*

The EPA noted that the Draft SEIS includes a dust mitigation plan but no information is given regarding a construction emissions mitigation plan. They recommended that the SEIS address the feasibility of mitigating construction emissions.

Response AQ-3 – The Trust welcomes EPA's recommendation. In response to the comment, a new mitigation measure (Mitigation Measure NR-23 *Construction Equipment Exhaust Measures*) has been added to the Final SEIS.

AQ-4. *Potential Impact on Point Reyes National Seashore*

The EPA noted that the Point Reyes National Seashore is a Federal Class I area and has additional protection from air impacts under the Clean Air Act. They recommended that the SEIS include a discussion of the impact, if any, on increased air pollution to Point Reyes National Seashore.

Response AQ-4 – The historic air quality conditions at the NPS Point Reyes North District Ranger Station are portrayed in the PTMP EIS (page 126). Because Point Reyes is generally upwind of pollution

sources, it has superior air quality. The nearest point within the Point Reyes National Seashore is approximately ten miles (16 kilometers) to the northwest, and generally upwind, of the PHSH district.

Construction-phase emissions would be of limited duration and quantity, and the longer-term emissions associated with occupation and use of the alternatives would not adversely affect regional or localized air quality. Table 19 shows that emissions of each alternative would be well below 80 lb/day (less than 14.4 tons per year) of reactive organic gases (ROG), nitrogen oxides (NOx), and particulate matter (PM_{10}). These emissions would mainly occur from mobile sources, and they would not be subject to federal permitting requirements for protecting air quality-related values (including visibility). However, for comparison, the emissions from the alternatives would not qualify as significant according to the federal stationary-source permitting program for Prevention of Significant Deterioration (PSD) [40 CFR 52.21(b)(23)]. Because of the limited emissions of each alternative and the generally upwind and relatively distant location of the Point Reyes National Seashore, no adverse impact on air quality-related values (including visibility) is anticipated to occur.

AQ-5. *Federal Standards for Fine Particulate Matter*

The CCSF noted that there are additional federal standards for fine particulate matter, i.e., $PM_{2.5}$. They asked that the SEIS discuss these values and how the alternatives relate to these standards.

Response AQ-5 – The federal designations for $PM_{2.5}$ attainment were established in 2005. The San Francisco Bay Area was found to attain the federal $PM_{2.5}$ standards, and this information has been updated and included in the Final SEIS. The most recent regional air quality attainment plan was updated by the BAAQMD in January 2006, and although it addresses ozone, it also indirectly helps to manage $PM_{2.5}$. Despite the fact that the BAAQMD is not required to develop an attainment strategy specifically for $PM_{2.5}$, the control of ozone precursors specified by the ozone plan will consequently help to control the reactions that lead to formation of secondary $PM_{2.5}$ in the atmosphere. The BAAQMD has not yet developed recommendations on how to quantify or characterize $PM_{2.5}$ impacts. However, none of the alternatives are anticipated to adversely affect $PM_{2.5}$ concentrations because 1) the alternatives would be consistent with the local ozone plan for attainment, which addresses precursors to both ozone and $PM_{2.5}$ formation; and 2) none of the alternatives would cause significant emissions of any pollutant including PM_{10}, which includes $PM_{2.5}$ as a subset.

AQ-6. *Characterization of Noise Levels within Alternatives 2 and 3*

RPN doubted the Draft SEIS conclusion that the evening and weekend noise for Alternative 3 would likely be similar to Alternative 2. They suggested that the conclusion defies common sense and lacks supporting data given the differential in tenant population and traffic.

Response AQ-6 – Alternative 3 would involve a residential population equivalent to that of the revised Alternative 2, and Alternative 3 would mainly be distinguished by a lack of the office and educational uses that would occur under Alternative 2. Traffic for daily and peak hour conditions and parking

demand on weekends under Alternative 3 would be about 90 percent of that under Alternative 2. Because the amount of evening and weekend noise caused by office and educational uses is expected to be small, noise levels during these times would tend to be dominated by the residential population. The text of the Final SEIS has been revised to clarify that Alternative 3 would cause less daytime noise than Alternative 2 because of the lack of the office and educational uses, but, as in the Draft SEIS, the similar residential populations between the alternatives would lead to similar evening and weekend noise levels.

AQ-7. ***General Construction/Demolition Emissions***

Caltrans referred to the text in the Draft SEIS and asked the Trust to explain how the short-term construction emissions would be higher than without the access variant.

Response AQ-7 – The summary in Table 2 (Draft SEIS, page 15) has been corrected to state that the variant would cause a higher level of short-term construction emissions, primarily due to the additional earthwork, grading, paving, and signal installation that would be needed to create the new lanes.

1.12 UTILITIES AND SERVICES (UT)

UT-1. ***SFFD Involvement***

The San Francisco Fire Department (SFFD) asked that they be involved in monitoring the progress of the project to ensure that life safety and response issues are adequately presented and addressed. Their particular concerns included the hydrant system, building and fire code compliance, and apparatus access, such as fire lane access within the project site.

Response UT-1 – Comment noted. As discussed on pages 188 and 189 of the Draft SEIS, the Presidio Fire Department, and not the SFFD, is the authority having jurisdiction within the Presidio. The SFFD would only provide assistance when possible in accordance with the terms of its mutual aid agreement with the Presidio Fire Department, and such assistance is not mandatory (i.e., if SFFD apparatus and personnel are not available to respond to a call by the Presidio Fire Department, they would not be dispatched). In the past ten years, assistance has only been requested two times. Thus, project impacts on SFFD day-to-day operations would be negligible. The SFFD is invited and encouraged to meet and discuss with the Presidio Fire Department any detailed plans and procedures of operations necessary to effectively address their concerns regarding fire prevention and suppression within the PHSH area. Also refer to Response to Comment UT-2 below.

UT-2. ***New Fire Station***

The SFFD supported a new fire station located in the southern area of the Presidio. They suggested that a new fire station would allow National Fire Protection Agency standard response times to be met when the Presidio Fire Department responded to emergency incidents. NAPP requested that the Final SEIS address

the environmental impact of an additional fire station. An individual asked whether there is a "hook and ladder" truck within the Presidio long enough to reach the top of Building 1801.

Response UT-2 – The need for additional Presidio Fire Department equipment and staff in the southern portion of the Presidio is identified on pages 195 and 196 of the Draft SEIS and is addressed in Mitigation Measure CO-12 *Expansion of Public Safety Services*. At a minimum, the Trust would provide space within an existing building at Wherry Housing or the PHSH district to house an on-duty staff of two firefighter/paramedic positions and a paramedic (ALS) ambulance. If these additions are not deemed sufficient to improve response times, the Trust will work with the Presidio Fire Department to identify and implement additional expansions in personnel and equipment as warranted. In addition, prior to building rehabilitation, construction documents and shop drawings will be submitted, reviewed, and approved by Presidio Fire Department fire inspector as part of a life safety evaluation. Construction documents will include all fire prevention requirements for the proposed use, including an automatic fire-extinguishing (i.e., sprinkler) system and fire alarm systems to minimize the need for specialized apparatus and equipment such as a "hook and ladder" truck. Shop drawings will be required to comply with the minimum requirements of the National Fire Protection Association (NFPA) Fire Codes and Life Safety Codes. The water supply and delivery system will be designed and maintained to provide sufficient flows to operate fire sprinkler systems and fire hydrants. The Presidio Fire Department fire inspectors will inspect construction in progress and provide life safety inspection of subsequent occupancy and public education to reduce fire loss.

UT-3. *Revisions to CCSF Streets*

The CCSF requested specific information about proposed revisions to the public right-of-way, including proposed revisions to City streets, sidewalks, or medians. The CCSF also sought assurance that the project would not result in conditions that could cause flooding to neighboring City streets, sidewalks, or structures.

Response UT-3 – In order to provide the one-way couplet at the 14th and 15th Avenue Gates, some signage and striping would likely be needed on 15th Avenue immediately south of the gate. If the mitigation measures proposed for the two-way stop-controlled intersections of Lake Street/14th Avenue and California Street/14th Avenue are desired by the CCSF, signage and striping would also be necessary to implement the right-turn only restrictions.

Flooding is not currently an issue in the nearby neighborhood. As drainage patterns would remain essentially the same, and less than one-third of the district would remain occupied by buildings, paving, and other hardscape, hydrologic conditions within the city would not be affected by the project.

UT-4. *Adequacy of CCSF Sewer System and Treatment Plant Capacities*

The CCSF and NPS requested additional analyses to demonstrate the Draft SEIS assumptions of adequate sewer system and treatment plant capacities. The CCSF asked that the SEIS address the potential impact

any increase in storm water flow from the project site to the City's combined sewer system may have on the number or volume of combined sewer discharges. "The analyses should evaluate the capacity of the existing PHSH District sanitary sewer mains, the amount of storm water infiltration expected from the area, the amount of storm water runoff the Project will generate, and the conditions under which the estimated sanitary and storm water flows will contribute to combined sewer discharges from the SFPUC west-side sewer system. An evaluation of historical sewer capacity problems when previous use of the site was at a maximum, historical sanitary flow volume, and the estimated average sanitary flow rate from this site at project completion" should be determined.

Response UT-4 – In response to the comment, the wastewater and storm drainage analysis in the Draft SEIS was expanded to include a comparison of the runoff projections included in the planning for the City's Richmond Transport project with current runoff projections for the PHSH district. This analysis concluded that the PHSH district was included in the planning for the Richmond Transport Project. The City's 1971 Master Plan for Wastewater Management, which served as the basis for the Richmond Transport Project, assigned an average runoff coefficient of 0.54 for the area tributary to the Richmond Transport (which includes the PHSH district). The 1971 Master Plan resulted in an estimated peak flow of 15.4 cubic feet per second (cfs) compared to the resultant peak flow of 11.4 cfs using the 1994 Presidio Storm Water Management Plan. Both estimates were based on a 10-year, 30-minute storm with an intensity of 0.67 inch per hour. This confirms that there is sufficient capacity in the San Francisco Public Utilities Commission (SFPUC) system to accommodate runoff from the PHSH district without increasing combined sewer discharges over planned levels. All alternatives would include storm water reduction measures described in Mitigation Measure UT-7 *Storm Water Reduction*, which include limiting impervious surfaces and other infiltration techniques. Additionally, during design infrastructure upgrades to the PHSH district, areas of infiltration to the sewer system will be addressed and other storm water minimization measures will be identified (see Response to Comment OT-1), which would further reduce impacts on the SFPUC west-side sewer system.

UT-5. ***Water Supply and Demand***

The SFPUC asserted that its San Francisco Urban Water Management Plan projection of Presidio daily water demand of one million gallons per day (mgd) is not a guaranteed water allocation for the Presidio and may need to be revised downward.

Response UT-5 – The SFPUC's comments are noted. The Trust is a retail water customer of the SFPUC. As such, it is vital that Presidio water demands are incorporated into the SFPUC's regional water demand planning. The Trust currently purchases supplemental water from the SFPUC when the Trust's local supplies are not sufficient to meet peak demands. As the Trust implements proposed land uses, restoration efforts, demolition, and other activities consistent with the PTMP, the Trust will continue to rely on the SFPUC for a portion of the Presidio's water needs. The Presidio's projected water demands will vary over the course of the year from 0.75 to 1.93 million gallons per day (mgd), with a projected annual consumption of approximately 445 million gallons resulting in an average daily demand of approximately 1.22 mgd. The Trust's on-site supplies (Lobos Creek) typically supply between 0.7 and

1.6 mgd after accounting for minimum flows to support riparian habitat. In addition to Lobos Creek supplies, the Trust is developing an on-site recycled water system that will provide up to 0.5 mgd of recycled water to offset irrigation demands.

The Trust is also taking measures to control water demands. These include installing water meters on buildings, billing tenants for usage, requiring that low-flow fixtures be installed as buildings are renovated, and installing efficient irrigation systems where landscaping is irrigated.

The Trust is committed to providing potable water to the park, protecting water resources and water quality, and conserving water. To this end, Trust staff are available to the SFPUC and wish to participate in its water planning efforts to provide timely and effective exchange of information in order to help ensure that these commitments are fulfilled (and also to identify opportunities to achieve mutual goals).

1.13 HYDROLOGY, WETLANDS, AND WATER QUALITY (HY)

HY-1. *Impact of Mitigation Measures*

The CCSF suggested that mitigation measures themselves could yield environmental impacts, particularly with respect to installation of storm water drainage system upgrades and slope stabilization. They said a detailed description of mitigations is needed to evaluate effectiveness or side effects of the mitigations.

Response HY-1 – The requested evaluation would be based on pure conjecture, as detailed site design information will be unavailable until after the environmental review process is completed. Nevertheless, the best management practices (BMPs) outlined under Mitigation Measure NR-15 in Section 3.11.3 of the Final SEIS that would be required to be implemented as part of the Storm Water Pollution Prevention Plan (SWPPP) provide sufficient information describing how discharges of storm water would be controlled to ensure that erosion and sedimentation would be reduced and adverse effects on water quality, including "possible side effects," would be minimized.

1.14 BIOLOGY (BI)

BI-1. *Impacts on California Quail*

The Golden Gate Audubon Society and various individuals maintained that increased traffic, noise, night lighting, and garbage associated with Alternative 2 would threaten to "undo the years of effort that have gone into bringing back the California quail." They urged that the reduction in human use that would result from selecting Alternative 3 as the Preferred Alternative would significantly reduce the impacts of a project located in such close proximity to quail habitat.

Response BI-1 – While the EIS preparers disagree with the conclusion reached by the commenters (as the California quail population would be protected under Mitigation Measure NR-9 *Wildlife and Wildlife*

Habitat), proposed human use associated with residential development within the PHSH complex under the revised Alternative 2 would be sufficiently reduced to those levels previously analyzed under Alternative 3.

BI-2. ***Prohibition on Pets***

The NPS requested that the Final EIS clarify whether the ownership and/or maintenance of pets and/or feral cats on the premises will be prohibited. "Will residents in the project area be allowed to own pets of any kind? Will the feeding of feral cats or wildlife be prohibited?"

Response BI-2 – The feeding of stray or feral cats and wildlife is prohibited park-wide. Restrictions on all pets would apply to any residences on the upper plateau (Battery Caulfield). On the lower plateau (the PHSH complex), Trust pet agreements and pet policies (as the Trust may amend from time to time at its discretion) would be implemented as addendums to residential leases. The pet agreements include seeking appropriate remedies for violations such as removing the pet from the Presidio or terminating the lease.

1.15 ENVIRONMENTAL REMEDIATION (ER)

ER-1. ***Remediation of Contaminated Sites***

The CCSF stated that the Draft SEIS should provide additional information regarding the environmentally contaminated sites within the project area. They requested specific information including 1) what contaminated materials may exist on each site, 2) which federal or state entities will have oversight of the remediation, 3) the timing of remediation activities, 4) monitoring and reporting requirements, and 5) a plan for addressing unanticipated contamination of a site. They continued: "[t]his Project cannot be constructed and occupied without completion of the remediation activities, yet the Draft SEIS defers all provision of tangible information regarding the contaminated sites until an unspecified process in the future. The Draft SEIS must characterize the hazardous materials and evaluate the potential impacts from construction of the Project and the remediation activities. The Draft SEIS should also provide more detailed and specific information to the public about the process of remediation to allow meaningful input at that time."

Response ER-1 – As stated in the Section 2.2, Related Activities Common to All Alternatives, the ongoing and previously planned improvements at these sites, including the remediation of Landfill 10, will occur in accordance with Trust's current schedule "regardless of whether the proposed action proceeds" and therefore the proposed action in the SEIS is not dependent on remediation activities on the five referenced sites in and near the PHSH district. As further described in Section 2.2.1, Remediation Activities, the timing and implementation of the remediation projects in and near the PHSH district are being planned so as to minimize interference with the PHSH project and reduce impacts on the neighborhood to the maximum extent possible. Information on the potential impacts of the remediation

actions at these sites, to the extent they are known and reasonably related to the project, are described in detail in the SEIS (see, e.g., Sections 3.2.2.8, 3.2.2.9, 3.3.2.2 through 3.3.2.5, 3.3.2.7, and 3.5.2.7; see also Response to Comment ER-2). Additionally, the mitigation measures described in the SEIS fully address and reduce any potential impacts of the project as they relate in any way to the remediation activities at these sites (refer to Section 3.11.3, Mitigation Measures). Comprehensive information regarding the planned remediation activities at these sites has been made available to CCSF and other members of the public through the Presidio's independent decision-making process that includes formal public notice, review, and comment. As stated in the SEIS, final remedies for these sites will be subject to additional public participation and comment prior to remedy implementation (see Section 2.2.1). Further follow-up by the public regarding these sites, including the nature of hazardous materials present, timing for remediation, involvement of resource agencies with jurisdiction, and monitoring and reporting requirements, may be addressed at that time. For more information regarding these sites, see also Revised Feasibility Study for the Main Installation Sites (Presidio Trust 2003d) and Landfills 8 and 10 Feasibility Study Report (Erler & Kalinowski, Inc. 2005).

ER-2. ***Impact on Lobos Creek from Landfill 10***

The CCSF asserted that the presence of hazardous materials on the PHSH site at Landfill 10 is only mentioned tangentially in the discussion of hydrology, wetlands, and water quality. The CCSF contended that because of the adjacency of Lobos Creek, a source of water supply for the [Trust] and NPS, this is a critical element for any environmental impact discussion and this discussion is missing from the SEIS. "A section should be added to the SEIS to characterize the hazardous materials and evaluate the potential impacts from all the alternatives…" They continued: "[t]he SEIS acknowledges the potential for contamination of the Lobos Creek watershed, but provides no specific information about how to protect against the contamination…" And concluded: "[t]he mitigation measures themselves could yield environmental impacts, particularly with respect to installation of storm water drainage system upgrades and slope stabilization. Because the SEIS does not provide any detailed description of the measures to be undertaken, it is impossible to evaluate either the effectiveness of the mitigation measures or possible side effects of the measures."

Response ER-2 – To the extent necessary, information regarding the environmental conditions at Landfill 10 and mitigation measures to address potential effects on water quality associated with Landfill 10 are discussed in Section 3.11, Hydrology, Wetlands, and Water Quality and other sections in the SEIS. The SEIS includes mitigation measures to adequately eliminate any potential effects on water quality, including potential degradation of surface and groundwater quality due to runoff. The mitigation measures identified include maintenance of existing and new drains and culverts to ensure that runoff is not altered or diverted toward Landfill 10 or the Lobos Creek watershed and groundwater basin (see generally Section 3.11.3, Mitigation Measures, and specifically Mitigation Measure NR-15 *Water Resources Best Management Practices*: "[d]ue to the presence of hazardous waste underlying the large parking area west of the PHSH, the diversion of subsurface drainage around the underground parking facility will not divert toward Landfill 10"). In addition to the implementation of water resources best management practices, the implementation of a Storm Water Pollution Prevention Plan will further reduce

any potential effects to water quality (see generally Section 3.11.3). For additional information regarding the planned remediation activities in the PHSH district, including the remediation of Landfill 10, see Sections 2.2 and 2.2.1. See also Revised Feasibility Study for the Main Installation Sites (Presidio Trust 2003d).

A separate section to further characterize environmental conditions within the PHSH district to evaluate the potential impacts from all alternatives is not necessary or required. The potential impacts associated with each alternative, including Alternative 2, are adequately discussed in the SEIS and will be avoided or mitigated. For further information regarding remediation activities on sites in and near the PHSH district, see Response to Comment ER-1.

The SEIS includes mitigation measures that would minimize adverse effects on the Lobos Creek watershed and groundwater basin, including eliminating any potential degradation of water quality due to runoff. Among the mitigation measures identified is the maintenance of existing and new drains and culverts to ensure that runoff is not altered or diverted toward Landfill 10 or toward Lobos Creek (see Mitigation Measure NR-15 *Water Resources Best Management Practices* in Section 3.11.3 for more information). With respect to Alternative 2, any alteration to the existing basement structure in the vicinity of Building 1801 and Landfill 10 will be completed in a way that prevents alteration of subsurface groundwater flow. Further, "[d]ue to the presence of hazardous waste underlying the large parking area west of the PHSH, the diversion of subsurface drainage around the underground parking facility will not divert toward Landfill 10" (see Mitigation Measure NR-15).

1.16 OTHER TOPICS (OT)

OT-1. ***Sustainable Technologies***

The SFPUC encouraged the Trust to include in the SEIS project-specific sustainable technologies that address the use of recycled water, minimize storm water runoff, and incorporate storage and reuse. SPUR expressed interest in the applicant's intention stated in the SEIS to incorporate sustainable development and building practices leading to a Leadership in Energy and Environmental Design (LEED) rating.

Response OT-1 – The requested project- and alternative-specific information cannot be made available earlier than the design phase (i.e., 100-percent construction documents), as the Trust will not select a private development partner that will develop the sustainable measures until after the environmental review process is completed and the Record of Decision is signed. Nonetheless, both development teams have expressed a keen interest in green design and LEED certification. For a discussion of impacts on SFPUC water and wastewater systems, refer to Section 3.9, Utilities and Services.

1.17 ENVIRONMENTAL REVIEW PROCESS (EP)

EP-1. *Concurrent Negotiations with the Private Development Team*

RPN believed that the concurrent negotiations with the private development team have "clouded what otherwise should be a clear cut decision to select Alternative 3" and have "effectively dictated the end result." RPN asserted that the Trust still prefers Forest City's proposal for 400,000 square feet of development and that the Trust "had already made up its mind."

Response EP-1 – The NEPA requires only that the Trust not take any action that would preclude the choice of other alternatives (40 C.F.R. Sections 1502.2(f), 1506.1(a)). The NEPA does not require that all planning be suspended during the EIS process. The Trust identified Alternative 2 as the Preferred Alternative, and entered negotiations with Forest City as the development team submitting a proposal generally conforming to this alternative. Although the Trust has begun negotiations with Forest City, these negotiations no more commit the Trust to Alternative 2 than the RFQ committed the Trust to pursue development at all. No actions have been taken that prevent the Trust from ultimately using one of the alternative scenarios, or that otherwise commit the Trust to accepting Forest City's proposal. The Trust has demonstrated that it is not wedded to a certain outcome by the fact that it has revamped Alternative 2 in response to comments.

In order to streamline the proposed project, the Trust has begun negotiations with Forest City to test the bidder's willingness to adhere to the maximum extent to the Planning Guidelines and to the project's purpose and need. Thus, 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. If there were any problems with proceeding with the Forest City proposal, whether environmental concerns or unrelated logistical disagreements, the Trust would be free to begin discussions with other project developers pursuant to the same SEIS. Accordingly, contrary to any perception otherwise, the Trust has made no final decision before having completed the NEPA process for the PHSH project being studied in this SEIS.

EP-2. *Project Approvals*

CCSF commented that the Draft SEIS lacks information about the process for reviewing and approving the project and how the public will have input into the decision-making process.

Response EP-2 – In response to the comment, the requested information is provided in the Final SEIS. The Trust will circulate this Final SEIS for at least 30 days before making a decision on the proposed action, and will hold a public hearing to receive comments during this time period. Although there is no requirement for the Trust to respond to comments received on the Final SEIS, the Trust will consider these comments before making a decision on the proposed action.

The Trust will determine whether the Final SEIS meets the standards for EIS adequacy under the NEPA, the Council on Environmental Quality (CEQ) NEPA Regulations, and its own NEPA regulations (36 CFR 1010), and will make a final decision on the proposed action in a Record of Decision (ROD). The ROD will be a written public record explaining why the Trust has taken a particular course of action and will describe:

- The decision on the proposed action;
- Factors considered in making the decision;
- Alternatives considered and the environmentally preferred alternative;
- Any adopted mitigation measures or reasons why mitigation measures were not adopted; and
- A monitoring and enforcement program for those mitigation measures that were adopted.

The ROD will enable the Trust to move forward to implement the proposed action. However, before any on-site demolition or construction activity begins, implementation will involve a complex preparatory development process that includes:

- Negotiating a development agreement that establishes conditions to the parties' obligation to enter into a long-term lease agreement and that addresses matters including deconstruction, demolition, abatement of hazardous materials, necessary permits and approvals, and other on-site preparation issues;
- Negotiating a ground lease that establishes appropriate terms and conditions for the long-term use of the site;
- Performing preliminary site investigation work such as due diligence investigations for environmental, archaeological, and other site-related matters;
- Securing any necessary permits and approvals;
- Soliciting, through competitive contracting procedures, demolition and construction contractors and negotiating applicable contract terms; and
- Preparing architectural design documents, consulting with historic preservation agencies, and seeking public input at periodically scheduled public meetings.

The Trust currently employs a design and construction review process as part of its permit issuance procedures 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 rehabilitation of buildings at the PHSH district will largely follow the design and construction permit review process already in place, with the exception of creating more opportunities for public input in the design phase.

EP-3. ***Adhering to Local Regulations and City Involvement***

PAR pointed out that the Trust has not considered or acknowledged the Congressional mandate that all federal projects be in compliance with 40 U.S.C. §3312 (c). "Under this section, 'any project for construction or alteration of a building' by a federal agency shall 'be constructed or altered only after consideration of all requirements (except procedural requirements) of the following laws of the State or a political subdivision of a State, which would apply to the building if it were not a building constructed or altered by a federal agency: 1) zoning laws; and 2) laws relating to landscaping, open space, minimum distance of a building from the property line, maximum height of building, historic preservation, esthetic qualities of a building and other similar laws.' 40 U.S.C. §3312 (d) also requires the federal agency to cooperate with State and local officials to consult to review the project, and to meet the requirements set forth in the previous sections. Thus in 'preparing plans for the building, [the federal agency] shall consult with appropriate officials of the State or political subdivision of a State, or both, in which the building will be located.'"

One individual "can't stress enough the importance of working with the city… in realizing a final plan. This will allow for a plan that serves all parties involved and allow for a more harmonious relationship in future Presidio Trust sanctioned projects." At the public hearing held on the Draft SEIS, NAPP also indicated that it was "essential" for the Trust to work more closely with the city, and serve as a "model for cooperative land use…"

Response EP-3 – Throughout the PHSH environmental review process, the Trust has fostered an open relationship with the CCSF and other local entities. A number of state and local agencies were consulted during the NEPA process as outlined in Section 4.3. Comments received from the CCSF and other public agencies were incorporated into the Final SEIS. Local land uses, residential densities, and future trends have been integrated into the environmental analysis. However, the specific provisions of 40 U.S.C. § 3312 do not apply to the rehabilitation and reuse of the PHSH district of the Presidio for several reasons, including the fact that the proposed action is "on land used in connection with federal programs for agricultural, recreational, and conservation purposes" (40 U.S.C. Section 3301(a)(5)(C)(iv)). Nonetheless, the Trust has considered state and local zoning laws, and laws related to such areas as landscaping, historic preservation, aesthetic qualities, and other similar laws in the alternatives analyzed. The Trust will continue to work with the CCSF to achieve mutual goals and to minimize possible conflicts between Trust activities and CCSF policies.

2 Public Agency Comments

2.1 UNITED STATES DEPARTMENT OF THE INTERIOR, NATIONAL PARK SERVICE, GOLDEN GATE NATIONAL RECREATION AREA

United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

TAKE PRIDE IN AMERICA

OCT 19 2004

ER 04/774

Mr. John Pelka
NEPA Compliance Manager
34 Graham Street, P.O. Box 29052
San Francisco, CA 94129-0052

Dear Mr. Pelka:

This is in regard to the Department of the Interior's review of the Draft Supplemental Environmental Impact Statement for the Public Health Service Hospital at the Presidio of San Francisco, San Francisco County, California.

This is to inform you that the Department may have comments, but will be unable to reply within the allotted time. Please consider this letter as a request for an extension of time in which to comment.

Our comments, if any, should be available by November 22, 2004.

Sincerely,

Vijai N. Rai

Vijai N. Rai
Team Leader, Natural Resources Management
Office of Environmental Policy and Compliance

United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94123

IN REPLY REFER TO:

L76 (GOGA-PLAN)
NOV 10 2004

Mr. Craig Middleton
Executive Director
Presidio Trust
34 Graham Street
San Francisco, CA 94129

Re: Public Health Service Hospital Draft Supplemental Environmental Impact Statement

Dear Mr. Middleton: Craig

The preservation and reuse of the Public Health Service Hospital (PHSH) is a vision that the Golden Gate National Recreation Area (GGNRA) shares with the Presidio Trust and will continue to support. After a thorough review of the development alternatives presented in the Presidio Trust's Draft Supplemental Environmental Impact Statement for the PHSH site, the National Park Service expresses its strong preference for Alternative 3: No Infill. Some of the reasons for this position follow.

- Alternative 3, which proposes removal of building 1801's non-historic wings, achieves the highest level of consistency with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (36 CFR 67) which recommends, as the preferred course of action, recovery of important character defining elements of the historic structure. We believe that the façade of building 1801 is one of the most important character defining elements that could be recaptured in a rehabilitation project. Alternative 3 provides the opportunity to arrest the deterioration of the buildings without adverse effects to the National Historic Landmark District.

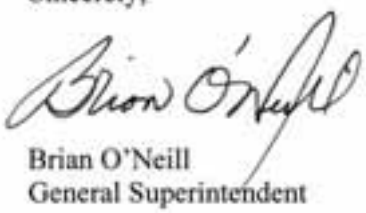
- GGNRA is concerned that the proposal in Alternative 2 to lower the non-historic wings of Building 1801 would result in a hybrid of the historic structure and the 1950's additions that would cloud the historicity of the building and the historic structure of the district by adding one more overlay that diminishes the overall feeling, association and setting of the NHLD character defining features. This treatment does not conform with guidance for rehabilitation projects provided in the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Structures (36 CFR 67) which, as stated above, recommends recovering important character defining elements. In essence, retaining and lowering the height of the wings is the same thing as proposing new construction on the façade of the building. We believe that, in order to meet the spirit of the Secretary's Standards, the wings should either remain as part of the changes made to

the building through time (Standard No. 4) or be removed to recapture an extremely important character defining element of the building.

- Alternative 3 improves the appearance and vitality of the PHSH district and preserves the natural values at the site by leaving Battery Caulfield free from future development.
- Alternative 3 reduces the potential for adverse impacts to the local threatened quail population, wetland habitat, the rare dune annual habitat (including the federally endangered San Francisco lessingia) and the oak woodland habitat.
- Alternative 3 meets the Presidio Trust's financial goals of generating a minimum of $1 million in annual base rent in 2008 and $207 million in total revenue over the 75-year term of the lease to help fund preservation and enhancement of the Presidio's natural, cultural, scenic and recreational resources. Alternative 3 requires the lowest initial investment, $55 million.
- Alternative 3 has the shortest construction period, 17 months, and would therefore reduce construction related impacts to park visitors and resources as well as shorten the period of construction related impacts to neighboring residential communities both inside and outside of the park. During construction, Alternative 3 generates fewer construction related truck trips per day through the park and the surrounding neighborhoods than Alternative 2.
- Alternative 3 generates fewer vehicle trips and lower AM and PM peak traffic volumes through the park and the surrounding neighborhoods than alternative 2. GGNRA supports investigation of measures that could further reduce the volume of traffic generated by the PHSH project by considering a higher level of senior independent and assisted living units.

Our detailed comments (attached) voice our concern for project impacts on the National Historic Landmark District and neighboring residential communities, as well as to important wildlife communities and natural habitats at the site. We are available to provide technical support to your efforts in accomplishing this complex and challenging task. Should you have any questions or concerns, please call Rick Foster, PHSH project liaison, at (415) 561-4472.

Sincerely,



Brian O'Neill
General Superintendent

Enclosure

Public Health Services Hospital DRAFT EIS Comments

Comment Number		Page Number	Comment Description
1		A-32 – A-33; 186	Water Supply and Demand –Project involvement of the in-house Water Conservation Coordinator (PTMP DEIS Mitigation UT-1) should be specified. Provisions for recycled water, which may become available during the life of the project, should be considered.
2		A-36 – A-37	Note that the State standards are not fully protective of the natural lightscape – they are focused on energy efficiency. There is not sufficient information to compare the alternatives, which appear to have different impacts on the lightscape.
3		A-36; 166	Visual Resources – There is not sufficient information to compare the alternatives with respect to the effects of artificial lighting. The level of nighttime occupancy would be expected to increase the level of fugitive light. Mitigation NR-7 in the PTMP FEIS states "Develop standard measures for lighting that ensure minimum disturbance to areas of natural darkness, and wildlife habitat, and reduce excess fugitive light in natural areas" and "Ensure no gain in light levels in natural habitats, to the greatest extent feasible." Standard measures should be specified; existing light levels in natural areas should be documented and a lightshed evaluation performed for the project alternatives.
4		A-41	The discussion of the Impacts of Pets is confusing. Please clarify.
5		A-41	Response to A.6.8: Request that the EIS address the impact of increased presence of dogs in sensitive plant and animal habitats resulting from increased use of the area.
6		A-41	Fencing should be designed to preclude pets (dogs) without restricting the movement of wildlife through the landscape. Every effort should be made to reduce the threat of injury or deaths due to animals being caught trapped by or entangled in the fencing.
7		1	Protecting and enhancing significant natural resources in the project area should be listed in the first paragraph of the PURPOSE section of the document.
8		19	Table 2 -- Change in Visual Appearance – incorporate changes to lightscape
9		20	Table 2 -- Adequacy of Storm Water Drainage System – verify that CCSF system can handle higher expected peak flows; suggest adding reference to communication with CCSF regarding stormwater capacity
10		23-24	Table 2 -- Existing adverse impacts on Nike Swale water quality should be mitigated aside from this project
11		46-47	Recommend addressing the relocation of the corporation yard from the Battery Cauldfied area and restoring the area of the upper plateau in one of the alternatives (Alt. 3) to enhance the habitat within the project area and provide a better connection between quail commons to the Nike Swale area. This could help offset some of the impacts from the location of residences and increased visitor use of the area.
12		46	Footnote 5 at the bottom of p. 46 is problematic. Active recreation areas would not be use compatible with the surrounding high value habitats.

Comment Number		Page Number	Comment Description
13		143	GGNRA is concerned that the proposal in Alternative 2 to lower the non-historic wings of Building 1801would result in a hybrid of the historic structure and the 1950's additions that would cloud the historicity of the building and the historic structure of the district by adding one more overlay that diminishes the overall feeling, association, and setting of the NHLD character defining features. This treatment does not conform with guidance for rehabilitation projects provided in the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Structures (36 CFR 67) which, as stated above, recommends recovering important character defining elements. In essence, retaining and lowering the height of the wings is the same thing as proposing new construction on the façade of the building. We believe that, in order to meet the spirit of the Secretary's Standards, the wings should either remain as part of the changes made to the building through time (Standard No. 4) or be removed to recapture an extremely important character defining element of the building.
14			Alternative 3, which proposes removal of building 1801's non-historic wings, achieves the highest level of consistency with The Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (36 CFR 67) which recommends, as the preferred course of action, recovery of important character defining elements of the historic structure. We believe that the façade of building 1801 is one of the most important character defining elements that could be recaptured in a rehabilitation project. Alternative 3 provides the opportunity to arrest the deterioration of the buildings without adverse effects to the National Historic Landmark District.
15		143	The discussion in the Draft EIS does provide enough detail to conclude that the Park Presidio Boulevard Access Variant will not have a significant impact on the cultural landscape.
16		165	NR-6 Add Lobos Creek riparian corridor to noise-sensitive areas
17		192	Footnote 24 – It should be noted here that increased reliance on the CCSF for potable water would increase the demand on Hetch Hetchy, not simply reduce demands on Lobos Creek.
18		p. 175 para 3.12.2.1	Alternative 1 Special-Status Plants. Although NPS respects and supports the innovative ideas expressed in the USFWS Recovery Plan for the San Francisco Lessingia wrt to human disturbance, we have suggested that the EIS not reference the habitats resilience to human activity. This could suggest to members of the public or construction crews that it is not harmful to enter endangered species habitat.
19		p. 178 para 3.12.2.4	Alternative 4: Battery Caulfield Alternative In light of the small California quail population, estimated at 13-14, that utilizes the surrounding area, direct and indirect disturbance from construction and human activities after construction at the Battery Caulfield site would put undo stress on the quail population, increasing the chances for extirpation. NPS recommends not selecting Alternative 4 due to the potential for adverse impacts to the local quail population. The same logic applies to the wetland habitat, the rare dune annual habitat (lessingia areas) and the oak woodland habitat. And not pursuing Alternative 4 would eliminate the need for implementation and enforcement of such elaborate mitigation measures.
20		202	UT-4 – Include potential water reuse at this site in addition to the conservation measures specified in PTMP.

Comment Number		Page Number	Comment Description
21		203	UT-8 – Incorporate explicit recycling incentives into construction and tenant contracts.
22		208	GE-X – Removal or relocation of geologic resources should be avoided. An evaluation of the grading plan for the selected alternative should be conducted to verify that the project is not causing impairment of the geologic resource at the site. Project-specific mitigations may be appropriate if significant disturbance is expected. (see PTMP FEIS, NR-16
23		209	3rd paragraph, delete 3rd sentence; there is no longer groundwater withdrawal from the Lobos Creek basin. It is all surface water diversion.
24		209	Add after 3rd paragraph: "Diversion and treatment of surface water from Lobos Creek provides most of the domestic water supply to residents of the Presidio. To protect water quality and public health, the permit for operation of the treatment plant includes constraints on activities within the Lobos Creek watershed. "Reference the latest California Department of Health Services permit correspondence.
25		210	2nd paragraph, last sentence – suggest modifying to read: "This water can then either be taken up or transpired by vegetation, or infiltrate deeper to groundwater." (there generally isn't much lateral movement in the unsaturated zone)
26		210	4th paragraph, 1st sentence – modify to read, "...bedrock contact and typically reflects the surface topography." Last sentence – modify to read "The silos may have a local influence on groundwater flow patterns."
27		210	Nike Swale: Surface water collects in the Willow Grove area and is present for longer periods than anywhere else on the site.
28		212	Nike Swale Area: A citation of the soil sampling done by EKI would be appropriate here.
29		212	1st paragraph, 2nd sentence – modify to read, "... southeast under a hydraulic gradient of 0.1 feet per foot." (a gradient is not a rate)
30		212	3rd paragraph – Based on this description, the Presidio Trust should take action to correct the potential pollution problems in the Battery Caulfield Area,
31		215	1st paragraph – See p. 212, 3rd paragraph comment
32		216	3rd full paragraph, 2nd sentence – Is reference to herbicide use appropriate here?
33		217	2nd full paragraph, 5th sentence – If the Trust believes that "the existing activities are heavily affecting the water quality," the situation should be remedied immediately.
34		217	Cumulative effects – the increase in peak loading to the CCSF stormwater system associated with the increased impervious surface, as well as the proposed reroute of Caltrans runoff to the system, should be addressed – it could contribute to sewer overflows.

Comment Number		Page Number	Comment Description
35		218-219	NR11/13 – The studies, evaluations and plans identified for the Battery Caulfield and Wetlands do not provide mitigation for loss of wetland function. The actions that would be taken in response to the affects on the wetlands need to be specified.
36		219	NR-14 – Specify the recurrence interval for monitoring, evaluation and implementation of mitigation measures. "as necessary" and "as warranted" seem too vague to avoid or address impacts.
37		219	NR-15, 2nd bullet – suggest adding, "except where it is deemed appropriate for dune habitat to have some sand movement."
38		219	NR-15, 3rd bullet – replace "waste disposal" with "waste minimization and management"
39		240	NR-1. Consider changing order of bullets so that the revegetation plan is prepared prior to immediately revegetating areas disturbed by project actions.
40		Section 3.12 Page 221	The upper plateau/Nike Site (Nike), though currently developed, is in the process of being slowly reclaimed by nature, despite its urban context. Any new urban development will slow this process. The following impacts to this developing habitat would have to be addressed: increased light and noise levels, weed seed transport, increases in the number of pets, increases in native pests, and fragmentation of quail habitat.
41		221	One of the main reasons the quail use the upper plateau is that it is quiet and unpopulated.
42		221	Address how long before the quail reuse the mitigated site after the extreme disturbance of housing construction.
43		221	We recommend that new residences should be no pets, as should the rest of the SW part of the Presidio.
44		221	We recommend that new residents to the area should be introduced to the stewardship program and encouraged to participate in stewardship activities.
45		221	The "giant" Toyon in the SE corner of Nike should be retained. This provides terrific bird habitat. The Toyons and other vegetation on the island in the middle of the asphalt should be retained; again this is great existing habitat.
46		221	The golf course as a whole should receive ample attention regarding the potential to enhance it as native plant and animal habitat. Particular attention should be directed as mitigation for impacts in PHSH site to the stand of Eucalyptus between the upper battery and the golf course. This is an ineffective corridor for quail due to the lack of protective understory cover. Please consider removing the Eucalyptus trees and replacing them with native trees and understory for the benefit of the quail, as well as other plants and animals.
47		221	What fencing will be put in or removed with the proposals? Please consider that fencing will restrict wildlife movements and may not be as pet impenetrable as described. Is there really a no net loss/gain of fencing policy?
48		243	NR-9. Request that the statement on the prohibition of ownership and/or maintenance of pet and/or feral cats on the premises be clarified. Will residents in the project area be allowed to own pets of any kind? Will the feeding of feral cats or wildlife be prohibited?
49		242	NR-5. Describe the measures that will be taken to prevent exposure of wildlife to human food/garbage

Comment Number		Page Number	Comment Description
			during construction and upon completion of the project.
50		242	Recommend the use of signage, posting of on-leash regulations and fencing to identify sensitive areas in order to reduce visitor impacts in sensitive plant communities and wildlife.
51		244	Request that the document identify the level of threat from corvids to the young quail and quail eggs on the Presidio. This may help to inform the actions for the control plan.
52		243-244	Suggest that a trash management plan be developed for the residents to reduce the potential for attracting mesopredators, a potential nest predator for quail and landbirds, to the project area.
53		263	Reference the latest California Department of Health Services permit correspondence.
54		271	Add CCSF to list of Acronyms
55			Alternative 3 is preferred to Alternative 2, because it would reduce the number of residences in the lower plateau and would not have residences located in the upper plateau. There would be impacts to natural resources, including significant plant and animal populations, associated with having residences and increased use within the project area under all the action alternatives. Alternative 3 would reduce these impacts by having a reduced number of residence, vehicles, and vehicle trips compared to Alternative 2. In addition, Alt. 2 would further fragment the connection between Quail Commons and the Nike Swale by locating residences on the upper plateau, where Alt. 3 would not.

2.2 UNITED STATES DEPARTMENT OF THE INTERIOR, FISH AND WILDLIFE SERVICE, SACRAMENTO FISH AND WILDLIFE OFFICE

United States Department of the Interior
FISH AND WILDLIFE SERVICE
Sacramento Fish and Wildlife Office
2800 Cottage Way, Room W-2605
Sacramento, California 95825-1846

IN REPLY REFER TO:
1-1-04-I-2530

OCT 26 2004

Memorandum

To: NEPA Compliance Manager, Presidio Trust, The Presidio, San Francisco, California (Attn.: John Pelka)

From: Acting Field Supervisor, Sacramento Fish and Wildlife Office, Sacramento, California

Subject: Draft Supplemental Environmental Impact Statement, Public Health Service Hospital, The Presidio of San Francisco, California

The Service has reviewed the Draft Supplemental Environmental Impact Statement (DSEIS), dated August 2004, for the Public Health Service Hospital located in the Presidio in San Francisco, California. Our office received the DSEIS on September 23, 2004. The DSEIS was developed to evaluate the potential impacts associated with the rehabilitation and reuse of buildings within the Public Health Service Hospital (PHSH) district of The Presidio to re-introduce residential uses to the district and to undertake related site improvements. The DSEIS evaluates the environmental impacts of the proposed action by supplementing and tiering from the Final Environmental Impact Statement for the Presidio Trust Management Plan (PTMP). The U.S. Fish and Wildlife Service (Service) issued a biological opinion for the PTMP in July 2002 (Service file 1-1-02-F-0228). Due to time constraints the Service is unable to provide a comprehensive review of the DSEIS; however we are providing some comments for consideration.

The PHSH district is located on an elevated plateau that supports remnant dune patches. The dune patches support unique, rare and ecologically significant native plant communities and provide important wildlife habitat. The remnant dune area north of the hospital supports small colonies of the endangered San Francisco lessingia (*Lessingia germanorum*) (lessingia). Located north of these remnant populations of lessingia is the Battery Caulfield area of the Presidio. Some of the alternatives proposed in the DSEIS would include housing in the Battery Caulfield complex.

The DSEIS evaluates five alternatives that differ in the amount of residential use, public facilities, location of some improvements, and extent of site improvements: the No Action

Alternative, the PTMP Alternative, the Infill Alternative, the No Infill Alternative, and the Battery Caulfield Alternative. The No Action Alternative assumes that no reuse and rehabilitation of the buildings within the PHSH district would take place and current use of the buildings would not change. Under the PTMP Alternative, rehabilitation of the PHSH complex would create up to 173,000 square feet of residential, cultural, and educational uses. Also, 17,000 square feet of existing building area on the upper plateau would be used for a mix of office and cultural/educational activities. The total maximum building area under this alternative would be 400,000 square feet and would include 210 residential units. The Service analyzed the impacts of the PTMP Alternative on the lessingia in the July 2002 PTMP biological opinion. The other alternatives are comprised of varying amounts of residential, cultural, and educational uses, thus each alternative has a different maximum building area.

The Battery Caulfield alternative proposes construction of housing units in the Battery Caulfield area. Construction would occur directly upslope of sensitive wetland plant communities and northwest of lessingia populations. Construction and other project related activities in the Battery Caulfield areas could indirectly affect lessingia populations by altering local surface water and groundwater flows, by releasing irrigation water and/or fertilizers, and by increasing the spread of non-native invasive plants. Increased presence of people in the Battery Caulfield area may lead to increased trampling of lessingia, particularly if off-trail use between Battery Caulfield and the PHSH complex were to increase. The Service believes that this alternative would result in greater impacts to lessingia than the other alternatives.

Although the Service has consulted on the PTMP Alternative, we encourage The Presidio Trust to adopt the No Infill Alternative. This alternative would create 230 new residential units on the lower plateau and a total maximum building area of 275,000 square feet. Because the number of proposed residential units is substantially less than the other alternatives (except the No Action Alternative), the amount of day use is less, and the amount of building area is reduced, the indirect effects to the lessingia would be less than effects associated with the other alternatives. In addition, this alternative would result in no additional development in the Battery Caulfield area, which would reduce potential impacts to lessingia.

The Service supports the mitigation measures proposed in the DSEIS to reduce impacts to lessingia and encourages The Presidio Trust to adopt the No Infill Alternative to further reduce impacts to lessingia.

This concludes our comments on the DSEIS for the PHSH site on the Presidio. If you have any questions regarding our comments please contact Mary Hammer of my staff at (916) 414-6625.

cc:
Carl Wilcox, CDFG, Yountville, California

2.3 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION IX

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

October 13, 2004

John Pelka
NEPA Compliance Manager
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

Subject: Supplemental Draft Environmental Impact Statement (SDEIS) for the Public Health Service Hospital at the Presidio of San Francisco (CEQ #040395)

Dear Mr. Pelka:

The Environmental Protection Agency (EPA) has reviewed the document referenced above. Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. Our detailed comments are enclosed.

We have rated this Supplemental Draft EIR/EIS as Lack of Objections (LO) (see enclosed "Summary of Rating Definitions"). The Presidio Trust (Trust) proposes to rehabilitate and reuse historic buildings within the Public Health Service Hospital (PHSH) district of the Presidio. This document tiers to the Final EIS for the Presidio Trust Management Plan (PTMP), adopted in August 2002. EPA recognizes the Trust's multiple objectives as well as the effort to address prior concerns associated with the previous Environmental Assessment (EA) submitted for this project in 2003.

EPA provided comments on the Draft EIS and Final EIS for the PTMP in 2001 and 2002, respectively. Our concerns in the Draft EIS were related to air quality impacts, wetland impacts, and traffic impacts. While most of our concerns were addressed in the Final EIS, we continued to request information regarding the applicability of a formal conformity determination be included in subsequent NEPA documents. We are pleased to see that a discussion of the applicability of this determination has been discussed in this document. We would like to see the Bay Area Air Quality Management District (BAAQMD) recommended significance level of CO emissions per day included in the document to allow comparision with the estimated weekday emissions of each alternative. We note that the construction emissions are not expected to exceed 100 tons per year for these pollutants.

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According to the SDEIS, all alternatives would lead to transit capacity problems and traffic congestion. Therefore, it is especially important to monitor this capacity on a regular basis and continue close coordination with transit authorities in order to implement mitigation measures. EPA is pleased with the selection of an alternative that would have fewer environmental impacts than the previous PTMP alternative (Alternative 1). While Alternative 3 would offer a greater level of protection for sensitive plant and animal species and less construction emissions than the other alternatives, Alternative 2, in combination with proposed mitigation, addresses many of EPA's previous concerns regarding wetland impacts. In addition, EPA supports the inclusion of the Park Presidio Boulevard Access Variant.

We appreciate the opportunity to review this SDEIS. When the Final EIS is released for public review, please send (2) copies to the address above (mailcode: CMD-2). If you have any questions, please contact Summer Allen, the lead reviewer for this project. Summer can be reached at 415-972-3847.

Sincerely,

Lisa B. Hanf

Lisa B. Hanf, Manager
Federal Activities Office

Main ID# 004239
Enclosure: Detailed Comments

EPA DETAILED COMMENTS ON THE SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE PUBLIC HEALTH SERVICE HOSPITAL AT THE PRESIDIO OF SAN FRANCISCO, OCTOBER 13, 2004

Air Quality

The San Francisco Bay Area Air Basin is in a moderate non-attainment area for ozone, and classified as maintenance for carbon dioxide under the Federal Clean Air Act. The California Air Resources Board (CARB) considers the Basin a state-level non-attainment area for ozone and particulate matter less than ten microns in diameter (PM10). Mitigation may be available to reduce the project's air emissions, including PM-10, diesel particulate matter (DPM), and ozone precursors [oxides of nitrogen (NOx) and volatile organic compounds]. Because of the air basin's non-attainment status, it is particularly important to reduce emissions from this project to the greatest extent feasible.

The DEIS includes a dust mitigation plan but no information is given regarding a construction emissions mitigation plan. EPA has previously recommended that the following measures be incorporated into Construction Emissions Mitigation Plans; that equipment a) not idle for more than ten minutes, b) not be altered to increase engine horsepower, c) include particulate traps, oxidation catalysts and other suitable control devices on all construction equipment used at the construction site and shall use ultra low sulfur diesel fuel with a sulfur content of 15 ppm or less or other suitable alternative diesel fuel, unless the fuel cannot be reasonably procured in the geographic area, and d) be tuned to the engine manufacturer's specifications in accordance with a defined maintenance schedule.

Point Reyes National Seashore is a Federal Class I area and has additional protection from air impacts under the Clean Air Act. Federal land managers are charged with direct responsibility to protect the air quality and related values (including visibility) of Class I lands (42 U.S.C. 7475(c)).

Recommendations:

The DEIS should address the feasibility of mitigating construction emissions. A discussion of the impact, if any, on increased air pollution to Point Reyes National Seashore should be included.

SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

ADEQUACY OF THE IMPACT STATEMENT

Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

2.4 BUSINESS, TRANSPORTATION AND HOUSING AGENCY, CALIFORNIA DEPARTMENT OF TRANSPORTATION

DEPARTMENT OF TRANSPORTATION
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November 12, 2004

SF001040
SF–1–6.17
SCH# 2003082132

Mr. John Pelka, NEPA Compliance Manager
The Presidio Trust
34 Graham Street, P. O. Box 29052
San Francisco, CA 94129–0052

Dear Mr. Pelka:

Public Health Service Hospital (PHSH): Draft Supplemental Environmental Impact Statement (DSEIS)

Thank you for continuing to include the California Department of Transportation (Department) in the environmental review for the above–referenced project. We have reviewed the DSEIS and offer the following comments:

Proposed New Signalized Intersection on State Route (SR) 1 [Park Presidio Boulevard]:

The Department has significant concerns over the feasibility of a new intersection on SR 1. We have recently received the Traffic Analysis and design exception requests for this intersection but have not had time to review these documents. Our response to these documents will be by a separate letter.

Specific to the DSEIS, we have the following comments regarding the proposed new intersection:

Refer to Page 7, second paragraph, 6th line where the report says "These impacts would occur in all alternatives if the Park Presidio Blvd. Access Variant is not implemented." The statement seems to preclude other alternatives. The Department believes that the DSEIR should not predetermine the scope of the "Lake Access" project. Similarly, all figures in the document show that an access to Park Presidio Boulevard is predetermined. That should not be assumed.

The report is unclear about what sort of control, if any, is proposed within the PHSH property for vehicles turning right from southbound SR 1 at the proposed new intersection. In addition, it is unclear whether or not the street within the PHSH would have adequate capacity to accommodate the expected demand turning right from southbound SR 1 without developing a queue that extends onto southbound SR 1. The potential queuing of these vehicles onto southbound SR 1 may impact the operation of SR 1 and needs to be evaluated.

Southbound SR 1 curves to the west between the tunnel and Lake Street. The stopping sight distance for southbound vehicles approaching the end of the queue at the proposed new intersection may not be adequate as a result of this curve. Has this been evaluated?

Northbound SR 1 is relatively level between Lake Street to about 275–300 meters north of Lake Street, where a relatively steep ascending grade begins. Northbound vehicles stopped at the Lake Street signal currently use the level section to build up speed to climb the grade. The proposed new intersection would reduce the level section north of the last intersection by approximately half. What is the impact of reducing the length of this level section on the operation of northbound SR 1 vehicles as they climb the grade?

The proposed new signalized intersection would create additional delay for vehicles on both northbound and southbound SR 1 for which there is no apparent mitigating operational benefit. What are the operational benefits for SR 1 traffic if the proposed new signalized intersection is constructed?

Should it ultimately be determined, however, that the Presidio Trust could construct an intersection with SR 1, the alternative to provide an unsignalized "right turn in/right turn out only" intersection appears to result in the least impact to traffic on SR 1. As a condition of approval, the right turn out movement would have to be stop controlled and the intersection designed to current Department standards (relative to sight distance, lane/shoulder widths, turning radii, etc.). If these standards could not be met, exceptions from these standards must be obtained from our Sacramento Headquarters.

Possible Closures at 14th and 15th Avenues

It is the Department's understanding that the San Francisco Board of Supervisors is considering a resolution that would close the entrances to the PHSH on 14th and 15th Avenues near Lake Street. What are the impacts on traffic patterns and operations in the project area if this resolution is passed and becomes operative?

Pedestrian/Bicycle Safety

Refer to Page 12, Bicycle/Pedestrian Section; page 64, second paragraph, fifth line; and Section 3.2.2.6, Park Presidio Access Variant, page 119. In each of these sections the text indicates that the proposed new access would improve pedestrian and bicycle safety when compared to existing conditions. The Department does not concur with this conclusion and would like the opportunity to review the data or information on which this conclusion is based.

Is it possible that pedestrians and bicyclists could access the new development using 14th or 15th Avenues?

Air Quality

Refer to page 15, General Construction/Demolition Emissions. Please explain how the short-term construction emissions would be higher than without the access variant.

Water Quality

Refer to page 23, Hydrology, Wetlands and Water Quality, under the Park Presidio column: the Department asks that you coordinate with Mr. Craig Cooper of the Presidio Trust relative to the diversion concept.

Encroachment Permit

Any project–related work or traffic control occurring within the State's right of way (ROW) will require an encroachment permit that is issued by the Department. To apply, a completed encroachment permit application, environmental documentation and five (5) sets of plans clearing indicating State ROW must be submitted to the address below:

Sean Nozzari, District Office Chief
Office of Permits
California Department of Transportation, District 4
P. O. Box 23660
Oakland, CA 94623–0660

Additional information on permits is available at http://www.dot.ca.gov/hq/traffops/devlopserv/permits.

Should you require further information or have any questions regarding this letter, please call Janine Abernathy at (510) 622–5487.

Sincerely,

Timothy C. Sable

TIMOTHY C. SABLE
District Branch Chief
IGR/CEQA

c: State Clearinghouse

2.5 GOLDEN GATE BRIDGE, HIGHWAY AND TRANSPORTATION DISTRICT

October 20, 2004

John Pelka
NEPA Compliance Manager
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

Re: Draft Supplemental Environmental Impact Statement (DSEIS), Public Health Service Hospital at the Presidio of San Francisco

Dear Mr. Pelka:

Golden Gate Bridge, Highway and Transportation District (District) has received the above referenced document and offers the following comments:

Transit Trip Distribution

Trip distribution for work trips by the project residents to the North Bay (and other areas) is not shown. Page B3.32 of B-3.247 of Draft Technical Memorandum No. 3 to Presidio Trust (dated August 10, 2004) states, "Trips to and from the project site expected to be made by transit were estimated on the expected mode split discussed in Technical Memorandum No.2 Travel Demand, and then assigned to transit routes based on the geographic distribution of origins and destinations." The geographic distribution of origins and destinations are not presented. This information could validate whether forecasted transit trips on Golden Gate Transit (GGT) shown on Table 6 are realistic.

GGT Route 10

While DSEIS correctly states GGT Route 10 "directly serves the (project) site" with a bus stop on Park Presidio at California, the DSEIS should realize that this stop is approximately 900 feet from Building 1801 (according to Figure 9), Route 10 service is hourly, and Route 10 only serves a few communities in southern Marin County. The most likely trip to/from the project via GGT would be utilizing PresidiGo service (at the project's "front door") to the Golden Gate Bridge Toll Plaza. The toll plaza bus stop is served by 19 GGT bus routes with headways that are far less than 60 minutes and provide transit service to many destinations in San Francisco, Marin, and Sonoma. Again, without the transit trip distribution info requested above, it cannot be determined whether it is realistic to assume all GGT customers to/from the project will use Route 10.

Construction Traffic

Page 123 (Alternative 2) estimates the number of truck trips during construction. Although routing of these trucks is not provided in the DSEIS, reference is made to a "Construction Traffic Management Plan." District requests to be consulted during development of such a plan.

Project Mitigation/TDM Program

Pages 116 and 131 refer to "monitoring of GGT routes." Who will perform this monitoring, what

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information will be required, and how often?

Transportation Demand Management Actions

Page 43 references a "website with a section dedicated to information on transportation and commute alternatives." The Presidio Trust website presently has two shortcomings concerning GGT bus service in San Francisco (which serves the Presidio):

1) GGT bus service in San Francisco changed almost a year ago. GGT route descriptions should be updated.
2) GGT bus service from the toll plaza (transfer point with PresidiGo routes) to other points in San Francisco is not indicated.

Please advise if District staff can assist by providing current information concerning GGT bus service in San Francisco.

Park Presidio Blvd Access Variant

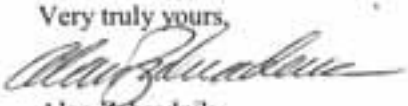
DSEIS does not clearly indicate how northbound Park Presidio traffic will access the project. Will right turns be permitted on Lake or via the variant intersection? Based on Synchro summaries included in Appendix B, it appears a northbound-left (NBL) movement may be permitted at the new variant intersection but left-turn volumes are zero (for both a.m. and p.m. peak hours). Similarly at the Lake Street intersection, NBL volumes are zero.

According to these Synchro summaries, there appears to be three (or four) northbound Park Presidio lanes at the new variant intersection. With an immediate downstream merge to two lanes, it is not clear if the DSEIS has accurately portrayed northbound traffic level-of-service (LOS) at this location.

Finally, the DSEIS reports northbound Park Presidio approach levels-of-service to be LOS "D" and "E" at Lake and California during the a.m. peak, respectively. Similarly, DSEIR reports northbound Park Presidio approach levels-of-service at Lake and California to be LOS "C" and "E" during the p.m., respectively. Given these values, it appears appropriate for the DSEIS to explain why LOS at the variant intersection is reported to be LOS "A" during both peak periods.

District appreciates the opportunity to comment on this project. Please call Maurice Palumbo, Principal Planner, at (415) 257-4431 if you have questions.

Very truly yours,



Alan Zahradnik
Planning Director

c: Maurice Palumbo, Principal Planner
H/P/G/MP/PresidioPHSH.104.doc

2.6 CITY AND COUNTY OF SAN FRANCISCO

MAYOR GAVIN NEWSOM
SUPERVISOR MICHELA ALIOTO-PIER
SUPERVISOR JAKE McGOLDRICK

CITY AND COUNTY OF SAN FRANCISCO

November 12, 2004

John Pelka, NEPA Compliance Manager
Presidio Trust
34 Graham Street; P.O. Box 29052
San Francisco, CA 94129-0052

Dear Mr. Pelka,

We write to enumerate the City and County of San Francisco's comments regarding the Presidio Trust's Public Health Service Hospital (PHSH) Draft Supplemental Environmental Impact Statement (Draft SEIS). First, thank you for extending the Draft SEIS comment deadline to allow for greater review and feedback from all interested parties. We are confident that robust feedback will better able the Trust to make an informed decision in their project selection and ensure a project with the greatest neighborhood and community compatibility.

The City's compilation of the attached comments involved a number of resources and community engagement. Specifically, the following City departments reviewed and provided comments on the Draft SEIS: the Planning Department, the Department of Parking and Traffic, the Public Utilities Commission/Department, the Department of Public Works, the Municipal Transportation Agency, and both the Police and Fire Departments. In addition to providing us with specific comments, these departments participated in an October 25, 2004 public hearing before the Board of Supervisor's Land Use Committee. In total there were 22 speakers including 13 members of the public at that hearing.

Please find attached the City's comments on the Draft SEIS. While they cover a range of issues, there are a few recurring themes that we heard from both the public and the City departments that reviewed the Draft SEIS, including:

- The document is not "user friendly" and does not present information in a readily understandable format.
- It is misleading in its comparison of the densities of the project alternatives and the surrounding area. It should include as a stated project objective or purpose, the goal of achieving compatibility with the surrounding neighborhood, balance with existing uses in the area and ensuring that necessary services and infrastructure are available or planned to serve the project.
- It refers in a number of places to mitigation measures that should be implemented by various City entities without any discussion of how the Presidio Trust will contribute the PHSH's pro rata share of the mitigation measures. For example, if the Presidio PHSH's project contributes to a traffic impact, even if it is within the City's street system, the Presidio Trust should pay its fair share of the mitigation.

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- The traffic data and methodology underpinning the traffic analysis is flawed and misrepresentative of historic and current traffic levels and patterns. This error distorts projections of the likely impact of the project on future traffic in the area as well as its impact on noise, air quality, public transit and other quality of life issues.
- The analysis for the PHSH project's water supply and demand, wastewater treatment and disposal, as well as the storm drainage programs, is insufficient in terms of its assumptions and projections. Additionally, the document lacks an emphasis and specific information on sustainable technologies for this specific Project, such as recycled water, and minimizing storm water run-off and incorporating reuse.

Our concerns regarding the development's impacts on the neighborhood and city services are serious, as articulated in the attached document. We sincerely hope that our comments, and those of other stakeholders, will have a tangible impact on the final project selected by the Trust. We expect the Trust to provide more complete and clear information about the project's impacts so that the City can effectively evaluate the project.

Development of the PHSH site will have a profound effect on the San Francisco neighborhoods that border it, and on the City as a whole. The proposed development requires a renewed commitment of coordination between the Presidio Trust and the City with regard to a number of issues including land use, transportation, public services and utilities and fiscal impacts. We are available to further discuss any of our comments or issues raised in this document and hope that we can continue to work together to support a project that is an asset to both the Presidio and the City.

Sincerely,

Gavin Newsom
Mayor

Michela Alioto-Pier
Supervisor, District 2

Jack McGoldrick
Supervisor, District 1

cc: Congresswoman Nancy Pelosi
Toby Rosenblatt, Presidio Trust, Board President
Craig Middleton, Presidio Trust, Executive Director

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City and County of San Francisco

Comments on Draft Supplemental Environmental Impact Statement for Presidio Trust Public Health Service Hospital

November 12, 2004

This document provides the comments of the City and County of San Francisco (the "City") on the Draft Supplemental Environmental Impact Statement ("SEIS") analyzing the proposed project to be located on the site of the Public Health Service Hospital in the Presidio of San Francisco ("Project"). City departments, including the Planning Department, Public Utilities Commission, Department of Public Works, Fire and Police Departments, Department of Parking & Traffic, the Municipal Transportation Authority and the Mayor's Office have reviewed the SEIS. The comments and questions are listed below according to topic.

General Comments

1. The SEIS fails to provide the public with adequate information. The National Environmental Policy Act ("NEPA") requires that environmental information be made available to the public. The SEIS does not fulfill this very basic objective because it is difficult for the public to follow the logic and format of the information presented. As detailed below, tables lack basic information that would allow the public to assess impacts of the Project, mitigation measures are vague and unspecified, and little information is provided about many of the required environmental topics.

2. Information from the Presidio Trust Management Plan Environmental Impact Statement ("PTMP EIS") is not summarized in this SEIS. NEPA regulations require that incorporated material be cited in the SEIS and its contents briefly described. Throughout the document, the information from the PTMP EIS is referenced but not summarized or discussed in a meaningful way. The reader lacks the critical information at hand to evaluate the analysis of this SEIS. The availability of the PTMP EIS online or at the Presidio Trust library is not sufficient to satisfy NEPA's requirement.

3. The SEIS lacks clear standards for assessing the significance of the environmental impacts. It is thus impossible for the reader to evaluate or measure objectively against a standard the conclusions about the environmental impacts set forth in the SEIS. This is a major flaw in the SEIS that should be corrected.

4. The SEIS lacks information about the process for reviewing and approving this Project. The SEIS should provide a detailed explanation of how this SEIS and Project fit in to the entire Presidio environmental and

implementation process. The section entitled "Next Steps" on page 7 should detail how the Project will be approved, if any hearing will be held before the Presidio Board of Trustees, and how the public will have input into the decision-making process.

5. The Summary contained in the SEIS does not meet the legal requirements set forth in NEPA. The summary does not contain a discussion of areas of controversy or issues to be resolved. In fact, the reader must review in detail the appendices to ascertain the issues raised by reviewing agencies and the public.

Purpose and Need

The SEIS should include as a project objective or purpose the goal of achieving compatibility with the surrounding neighborhood, balance with the existing uses in the area, and ensuring that necessary City services and infrastructure are available to serve the Project. Achievement of these objectives is necessary to ensure the success of the Project and the continued livability of the surrounding neighborhoods.

Remediation of Contaminated Sites

The SEIS fails to provide any information regarding the environmentally contaminated sites. The only discussion of the contaminated sites and necessary remediation activities appears on pages 39 - 41 in the Alternatives section of the SEIS. There, the SEIS acknowledges that five different sites within the Project area are likely to be contaminated. Yet the SEIS provides no specific information about (i) what contaminated materials may exist on each site, (ii) which federal or state entities will have oversight of the remediation (DTSC is the only agency named at all, mentioned in passing as an agency with some approval authority for Graded Area 9 Landfill), (iii) the timing of remediation activities, (iv) monitoring and reporting requirements, and (v) a plan for addressing unanticipated contamination of a site. This Project cannot be constructed and occupied without completion of the remediation activities, yet the SEIS defers all provision of tangible information regarding the contaminated sites until an unspecified process in the future. The SEIS must characterize the hazardous materials and evaluate the potential impacts from construction of the Project and the remediation activities. The SEIS should also provide more detailed and specific information to the public about the process of remediation to allow meaningful input at that time.

Land Use, Housing and Schools

1. The SEIS is very misleading in its comparison of the densities of the Project alternatives and the surrounding area. First, the SEIS compares the number of units to "the Richmond neighborhood" without any clear definition of

what comprises "the Richmond neighborhood." If the Richmond is defined as the entire northwest quadrant of the City, this area is too large and does not reflect the more localized impacts of high density housing in a low-density neighborhood. The SEIS statement that the Project will provide less than 1% of the total housing in the entire Richmond is misleading and unenlightening. Second, the SEIS compares densities without any explanation of how densities on the Project site are calculated or a clear definition of the areas being compared. The density (approximately 19 units/acre for the preferred Project) is based on a total acreage of the lower plateau area, but does not define the boundaries of the lower plateau area. How much open space is included in this definition? A large portion of the housing will be provided on a small portion of the site. The housing to be located in the large multi-story building is in fact quite dissimilar in character from the surrounding single-family, low-rise residential neighborhood. The SEIS should reflect this difference.

In addition, the SEIS compares Project site density to the "surrounding neighborhood" without any explanation of the geographic boundaries of the "surrounding neighborhood" to allow the public to compare the numbers. Is the "surrounding neighborhood" the entire Richmond area? The SEIS must clarify the areas being compared and provide a realistic analysis of the comparative densities in order to allow the public to assess the analysis and evaluate the impacts on land use.

2. Pages 79, 80, 82: When performing comparisons among the alternatives, the requested no action alternative should be incorporated to be complete.

3. How does the amount being contributed to the San Francisco Unified School District under the federal School Impact Aid Program compare to the amounts a private developer would be required to contribute to the School District? This information would help the reader assess the adequacy of the contribution to San Francisco schools and determine whether additional, unmitigated burdens are being placed on the school district. The SEIS should also define and enumerate what actions the Presidio Trust has already taken to "collaborate" with SFUSD in order to give better definition to the mitigation measure.

Transportation

The transportation analysis is inadequate and flawed in many ways.

1. Environmental setting: The environmental setting data overestimates and mischaracterizes the existing traffic on Lake and California Streets. The SEIS provides computer-derived estimates of existing level of service ("LOS") for the intersections on Lake and California Streets; we suggest that the data be verified in the field. Observation at some of the critical intersections shows that

the traffic volumes are not as high as those predicted by the model. (See Table 7.) In addition, the Highway Capacity Manual ("HCM") assumes that traffic arrives at random times on California and Lake Streets, rather than in platoons that are created by upstream traffic signals.

The SEIS's description of the environmental setting serves as the baseline against which changes that will result from the Project are measured. Failure of the SEIS to provide accurate baseline data calls into question all of the traffic analysis of the Project's impacts and the cumulative impacts.

Page 86, 4th paragraph: What activities were taking place at the PHSH site in November 1998 and in October 2002? When was the site occupied by the Chinese American School and Jewish Community Center? How do these more recent traffic volumes compare to the projected volumes on 15th Avenue?

The SEIS misleads the reader about the environmental setting when it refers back to traffic generated by the hospital, which closed 24 years ago. That data is no longer relevant to the environmental setting. In addition, residents in the area have testified that the SEIS overstates the traffic historically generated by the hospital.

2. The SEIS must show clearly the Project impacts. Analysis showing existing conditions plus the specific Project impacts must be added to the SEIS. The City regularly and methodically uses this approach as a method of clearly showing project impacts. Yet the SEIS dismisses this approach as "...an artificial construct, because it assumes that a project can be constructed overnight..." (page A-18, Responses to Comments) without any substitute analysis that would show the impacts of just the Project. Either an interim build out year, with and without the Project, or future (2020) conditions with and without the Project could be used to clearly demonstrate to the public how much traffic is attributable to the Project. The traffic analysis is incomplete and lacks a clear exposition of Project impacts without this comparison.

3. It is very difficult to sort through the traffic analysis that is provided and get a clear assessment of the data being reported. For example, on pages 103 and 104, Tables 11 and 12: The tables need a column showing the existing LOS. It would also be very helpful if the information on Existing plus Project LOS shown on Tables A-3 and A-4 could be incorporated into these tables. Tables A-3 and A-4 show that the intersection of 15th/Lake remains at LOS B for most alternatives. However, when the "cumulative" traffic is added (as shown on Table 12) the LOS increases to C, D or E. This information should be included and analyzed as part of the text of the SEIS.

In addition, on page 112, Table 13: The table should show the existing volumes at the 15th Avenue Gate. It should also have separate columns for 14th and 15th Avenues, in order to show the changes in volume on each Avenue

under the various alternatives. Traffic volumes generated by the proposed Project need to be shown separately from cumulative growth traffic and cut-through traffic. Cut-through traffic needs to be defined and discussed in the text.

4. The SEIS must anticipate that 14th and 15th Avenues may not be available as major access roadways to the Project site. The San Francisco Board of Supervisors has already introduced legislation to temporarily close 15th Avenue and 14th Avenue has been closed to traffic for many years. Each of the alternatives assumes that these streets will be used as parts of a one-way couplet. Even the variant where Park Presidio Boulevard is used for ingress and egress assumes that 14th and 15th Avenues will continue to be available for northbound traffic in to the Project site. The SEIS should provide traffic analysis that considers these closures.

5. The SEIS analyzes a new intersection on Park Presidio Boulevard north of Lake Street as a variant. Yet the SEIS provides no information on the likelihood of the variant being constructed.

6. The SEIS concludes that the intersection at California and Park Presidio Boulevard will deteriorate to LOS E in the pm peak hour based on cumulative conditions. The SEIS then states that all Presidio traffic would contribute less than 2% to this intersection, citing generally to the PTMP EIS. This conclusion is impossible for the public to evaluate without further information regarding the Project and the intersection. The Project's relative contribution to the California Street impacts will differ greatly from its contribution to the Park Presidio Boulevard impacts because of the different capacities and usage of these two very different thoroughfares. Given that Park Presidio is a major City and State thoroughfare where traffic use is very high, the Presidio's contribution will necessarily be a smaller percentage. However, the Project's relative contribution to impacts on California Street will be greater as California Street does not currently have the high volumes of traffic that Park Presidio Boulevard does. The tables in Appendix B appear to bear this out, as the existing volume of traffic on Park Presidio Boulevard is much higher than the volumes on Lake and California Streets. The SEIS's conclusory statement, borrowed from the PTMP EIS without any citation or explanation, masks the analysis that may be helpful for the public to evaluate the impacts and suggest mitigation measures for some aspect of this impact. In addition, the citation to the PTMP EIS does not provide any relevant information for this Project, which differs from the earlier project on the PHSH site that was analyzed in the PTMP EIS.

In addition, the "analysis" in this section avoids looking at the Project's impacts and merely states that "only two percent of less" is added by the Presidio as a whole. If the percentage is known then the numbers attributable to the Project should be available and reported for clarity for the public and stakeholders.

7. Page 85 and 86, Section 3.2.1 Affected Environment – The SEIS should include a discussion of the 14th Avenue Gate and the fact that the gate has been closed to vehicular traffic for a number of years and is currently open only to pedestrians as it is a part of the affected environment.

8. Page 89, first complete paragraph, starting at the sixth line – These two lines of text beginning with "An intersection operating at LOS D…" are close to giving a significance criteria but do not clearly state that this measure of significance is being used in this document.

9. Page 91, second full paragraph – The SEIS should clarify that MUNI routes 1AX and 1BX are express routes and run only during the peak hours; inbound (to downtown) in the morning peak and outbound in the evening peak.

10. Page 105 – 111, bullet points – Using the phrases "five of the eight intersections" and "two of the eight" without naming the intersections in question is not presenting clear information to the public. The five intersections and the two intersections should be named in the text.

11. Page 107, Footnote 11 – The footnote is confusing and unclear, please clarify what information is trying to be presented here.

12. Page 111, Section 3.2.2.3 – This section is entitled "Gate Volumes and Cut-Through Traffic," however, there is no analysis of cut-through traffic other than the statement that "Some percentage of this traffic was cutting through the Presidio entirely, traveling between the Golden Gate Bridge and the Richmond District." Why is this important? If it is important then a projection of the numbers of such traffic should be made.

13. Page 112, Table 13 – Because of the "note [a]" regarding forecasted 2020 gate volumes being rounded, an assumption can be drawn that the table is a comparison for the year 2020. It would be much clearer to put the year in the title, as was done in tables 11 and 12.

14. Page 115, Table 14 – This table should be labeled with the year of comparisons.

15. Page 116, Discussion on Alternative 1 – The statement is made toward the end of the paragraph that the Presidio is expected to contribute about 10 percent to total peak hour ridership in 2020 but the Project's contribution is not called out. Ten percent is a significant contribution, but without any standards of significance the reader doesn't know how the Project contributes.

In the next paragraph, Alternative 2 ridership effects is called "slightly higher" than Alternative 1 but the reader still doesn't know if this is significant or not, or what the actual impacts are.

16. Page 117, Section 3.2.2.6 – Are the pedestrian and bike trips discussed in this section internal to the Presidio, external or both? Please clarify in the text.

17. Page 119, last paragraph and page 120 first paragraph – The turnover rate for cultural/educational and conference use seem high. Where did these values originate?

18. Page 120, Table 15 – The existing parking spaces in both the Upper and Lower Plateau areas should be included in the table.

19. Page 121, first full paragraph – The text of the last sentence says the surplus is 113 parking spaces while the Table on the previous page says 112; please correct.

20. Page 123, first paragraph – The statement is made that "Construction routes through 14th and 15th Avenue Gates would be minimized." Does this mean that the 14th Avenue Gate would be opened immediately after Project approval or when the renovation of the hospital is completed? Please discuss in the transportation setting when this change to the street system would be made.

21. Cumulative Impacts: Page 124, Section 3.2.2.9 - Why is this section called "Cumulative Effects" when the year 2020 impacts have already been detailed out in Section 3.2.2.2? What is different about this section from the previous section that uses year 2020 data?

The SEIS misstates the proper method for evaluating cumulative impacts. On pages 126-129, the SEIS concludes for each of the alternatives that "these cumulative impacts would occur whether or not the proposed action is implemented..." This is not the appropriate inquiry for assessing cumulative impacts. First, the SEIS must define the area of impact. The next step is to determine whether significant cumulative impacts will occur. If cumulative impacts will occur, then the final step is to determine whether the proposed Project will contribute in some way to those cumulative impacts. The SEIS does not provide this complete analysis, and fails to provide any reliable data about what the Project's precise contribution is.

What assumptions were used to project cumulative traffic growth?

22. Transit Concerns:

- The location is a few blocks from the 1 California Muni line, a reasonable distance to transit. Walking is expected as part of a transit trip in San Francisco. If service location is seen as inadequate, the Presidio Trust must pay for any relocation or extension of service closer to the development.

- Depending on the number of units, the 1 California Muni line will need more service. It is unclear where additional operating dollars would come from to fund this service level. It appears that no new funding would be made available as part of this residential development.

- If southern auto access to the Project is provided, the potential for increased auto congestion interfering with the 1 California Muni line should be considered, based on the expected volumes of auto traffic.

- Everything possible should be done to ensure that pedestrian access to transit is encouraged, and auto use is discouraged. All new development should be oriented toward improving the mode split (more transit use, less private auto use) to alleviate ever-increasing congestion.

- Livable calm residential streets are a priority. Allowing a street to have increased auto volumes to the point where the street would require signalization, dedicated turn lanes, or multiple lanes is a policy matter that should be seriously considered and discussed with the City and the neighbors.

- Housing should be accommodated with a low level of auto use (and resulting auto impacts). The MTA would be interested in working with the Presidio Trust with this type of development. If the Project makes minimal effort to encourage transit over car use, then the Project does not help further the MTA's overall traffic and transit goals and should therefore be asked to fully mitigate every auto and transit impact.

23. Mitigation Measures:

- When mitigation measures are outside the jurisdiction of the lead agency, the SEIS must discuss the probability and feasibility of the mitigation measures being implemented by other agencies. The SEIS does not provide this information. NEPA requires discussion of the probability of the mitigation measures being implemented to ensure that environmental effects of a proposed action are fairly assessed.

- The document refers in a number of places to mitigations that should be undertaken by the City and by Muni without any discussion of how the Presidio projects will mitigate the Project's pro rata share of the impacts caused by the development. Section 3.2.3 on Mitigation Measures just states that with minor exceptions "all measures fall outside the Trust's jurisdiction." If the Project contributes to the impact -- even if it is within the City's street system -- the Presidio should pay its fair share of the mitigation. This is a common practice with developers in all jurisdictions.

- The SEIS states that construction traffic will be addressed by a construction traffic management plan but provides no specifics on routes, timing and possible impacts of the re-routing of traffic during construction. Who will be responsible for drafting, implementing and monitoring such a plan?

- The transit mitigation measures require monitoring of transit demand, but contain no standards for triggering additional service increases, nor any method for the Trust to contribute its fair share to such necessary increases. The mitigation measure is inadequate under NEPA, as it does not provide the public with any method to measure impacts or to assess the probable timing of necessary service increases.

- Page 131, last paragraph – A number of mitigation measures are stated as having been addressed in the definition of the Project alternatives. Does this mean that the previous detailed mitigations are now a part of the Project alternatives or that they are not needed for the PHSH Project? Please clarify.

24. Specific corrections:

- Page 88, 3rd paragraph, 5th line: Change "13 accidents" to "13 reported collisions."

- Page 91, top paragraph: Please change "inbound" to "northbound" and "outbound" to "southbound."

- Page 102, 4th paragraph: It is unclear why the proposed signal timing changes on Park Presidio Boulevard are only proposed for the Park Presidio Boulevard Access Variant and not for other variants.

Archaeological Resources

Pages 147 and 148 – The amount of excavation for the underground parking associated with Alternative 2 should be set out for a truer picture of the potential effects. Without knowing if the excavation is 10 ft. by 10 ft. by 10 ft. or 100 ft. by 100 ft. by 100 ft., there is nothing to validate the characterization of the

impact as "slightly greater than the Requested No Action Alternative" which does not have any excavation proposed at all.

Air Quality

1. Because so much of the air quality analysis is tied to the levels of traffic predicted, the failures of the SEIS's traffic analysis will also lead to inaccurate estimates of air quality impacts and contaminants related to traffic.

2. Page 154, Table 18 – Please explain why there is no variation between the 1-Hour Average carbon monoxide ("CO") values among the alternatives and the alternatives with variants when Table 19 shows some substantial differences in lbs/day between the alternatives from 55.17 for Alternative 4 to a high of 178.84 for Alternative 1. Same question with respect to the 8-Hour figures.

Table 18 predicted values are for what year? None is shown on the table.

3. Page 155, Table 19 – There are now additional federal standards for fine particulate matter, i.e., $PM_{2.5}$. Please show these values and how the alternatives relate to these standards in Table 19. The SEIS must discuss these impacts.

4. Page 156, Section 3.5.2.6 – The first line in this section begins "As shown in Table 19," when discussing localized CO concentrations. It appears that Table 18 should have been referenced; please correct.

Noise

1. Pages 161 and 162, Tables 21 and 22 – The notes in these tables use two different symbols (L_{EQ} in Table 21 and $L_{EQ}(H)$ in Table 22) to represent "equivalent energy indicator; average noise over one hour." Although both may be correct it is confusing to the public; one should be chosen and used throughout the document.

2. Pages 162 – 164, noise mitigation measures – Mitigation measures are called out specifically for Alternatives 1 and 2 but not for Alternatives 3 and 4 even though the text states on page 164 that "Compared to Alternative 2, evening and weekend noise would likely be similar." Why this discrepancy?

3. Page 165, Section 3.6.3, first paragraph -- Would the mitigation measures brought forward from the PTMP EIS be implemented with whatever Alternative is selected? The text is unclear.

4. Because the environmental setting for traffic was miscalculated and the traffic analysis is flawed, noise impacts caused by traffic must be re-evaluated and corrected.

Visual Resources

Page 180, Section 3.7.3 – The text in parentheses regarding Mitigation Measure NR-7 is confusing coming just after the statement that no mitigation measures were identified in the PTMP EIS. Please clarify if Mitigation Measure NR-7 will or will not be implemented.

Utilities and Services

1. The San Francisco Fire Department (SFFD) would like to be involved in monitoring the progress of the Project and to ensure that the Fire Department's life safety and response issues are adequately presented and addressed. Particular concerns include the hydrant system, building and fire code compliance and apparatus access, such as fire lane access within the Project site.

2. The SFFD would support a new fire station located in the southern area of the Presidio. This new fire station would allow National Fire Protection Agency's standard response times to be met when the Presidio Fire Department responded to emergency incidents.

3. The SEIS provides no specific information about proposed revisions to the public right of way, which is typical during the environmental review process. Specifically, the SEIS should provide information about the following issues and include the San Francisco Department of Public Works in on-going discussions about the following:

- Any proposed revisions to the public streets, sidewalks or medians, leading to/from the Project are as agreed by the City and built to City Standards. Of particular note are sidewalk grades, curb ramps, driveways, placement of structures within the sidewalk (including sign posts, streetlights, signal systems, control boxes, etc), which will be reviewed with particular scrutiny to ensure pedestrian accessibility and safety.

- Any proposed revisions to the configuration of public streets and/or sidewalks (width, elevation, alignment, vacation, etc) require approval by the County Surveyor in consultation with City agencies and private utilities and are subject to final approval by the Board of Supervisors.

- The Project must assure that the facilities do not result in conditions that could cause flooding to neighboring City streets, sidewalks or structures.

4. The report should also address traffic safety issues on page 114 related to the creation of a new intersection on Park Presidio Boulevard. Existing

southbound traffic travel at a high rate of speed (40-50 mph) in a down slope and the new intersection may result in increased rear-end type collisions. Also the potential for running the red light is high. (There is currently a red light running camera mounted at Lake and Park Presidio.)

5. The San Francisco Police Department will need to address any increase in public safety issues in the adjacent area. The SEIS states that there is a projected increase in traffic to and from the Project site. This increase in traffic is likely to generate traffic-related complaints, traffic accidents and enforcement activities. Traffic Engineers from the City's Planning Department, the Department of Parking and Traffic and the Police Department will evaluate data related to these issues and will be required to respond as problems increase with the additional traffic generated by the Project.

6. Water Supply and Demand (SEIS Section 3.9.1.1)

- The SEIS references the San Francisco Urban Water Management Plan (February, 2001) projection of a Presidio daily water demand of 1 mgd. This projection is not a guaranteed water allocation for the Presidio.

- In compliance with the California Department of Water Resources requirements, the San Francisco Urban Water Management Plan will be updated in 2005. Analyses, to be conducted in support of updates to the San Francisco Urban Water Management Plan, may demonstrate that the Presidio water use projections need to be revised downward.

7. Wastewater Treatment and Disposal & Storm Drainage (SEIS Sections 3.9.1.2 & 3.9.1.3)

- The SEIS needs to include hydraulic analyses to demonstrate the Project assumptions of adequate sewer system and treatment plant capacities. The SEIS does not address the potential impact any increase in storm water flow from the Project site to the City's combined sewer system may have on the number or volume of combined sewer discharges. The analyses should evaluate the capacity of the existing PSHS District sanitary sewer mains, the amount of storm water infiltration expected from the area, the amount of storm water runoff the Project will generate, and the conditions under which the estimated sanitary and storm water flows will contribute to combined sewer discharges from the SFPUC west-side sewer system. An evaluation of historical sewer capacity problems when previous use of the site was at a maximum, historical sanitary flow volume, and the estimated average sanitary flow rate from this site at Project completion must be determined.

- The SFPUC encourages the Presidio Trust to include in the SEIS Project-specific sustainable technologies to the extent applicable and practical that address the use of recycled water, minimize storm water runoff and incorporate storage and reuse. This information should be provided specifically for this Project to show how these systems and efforts will be used for this Project.

Hydrology, Wetlands and Water Quality

1. The presence of hazardous materials on the PHSH site at Landfill 10 is mentioned tangentially in the discussion of Hydrology, Wetlands, and Water Quality on pages 214 and 220. Because of the adjacency of Lobos Creek, a source of water supply for the National Park Service, this is a critical element for any environmental impact discussion and this discussion is missing from the SEIS. A section should be added to the SEIS to characterize the hazardous materials and evaluate the potential impacts from all the alternatives, particularly Alternative 2 which is the Trust's preferred Alternative.

2. Landfill 10 should be shown on Figure 23 as it is discussed in the text on page 210.

3. The SEIS acknowledges the potential for contamination of the Lobos Creek watershed, but provides no specific information about how to protect against the contamination (see, e.g., page 214).

4. The mitigation measures themselves could yield environmental impacts, particularly with respect to installation of storm water drainage system upgrades and slope stabilization. Because the SEIS does not provide any detailed description of the measures to be undertaken, it is impossible to evaluate either the effectiveness of the mitigation measures or possible side effects of the measures.

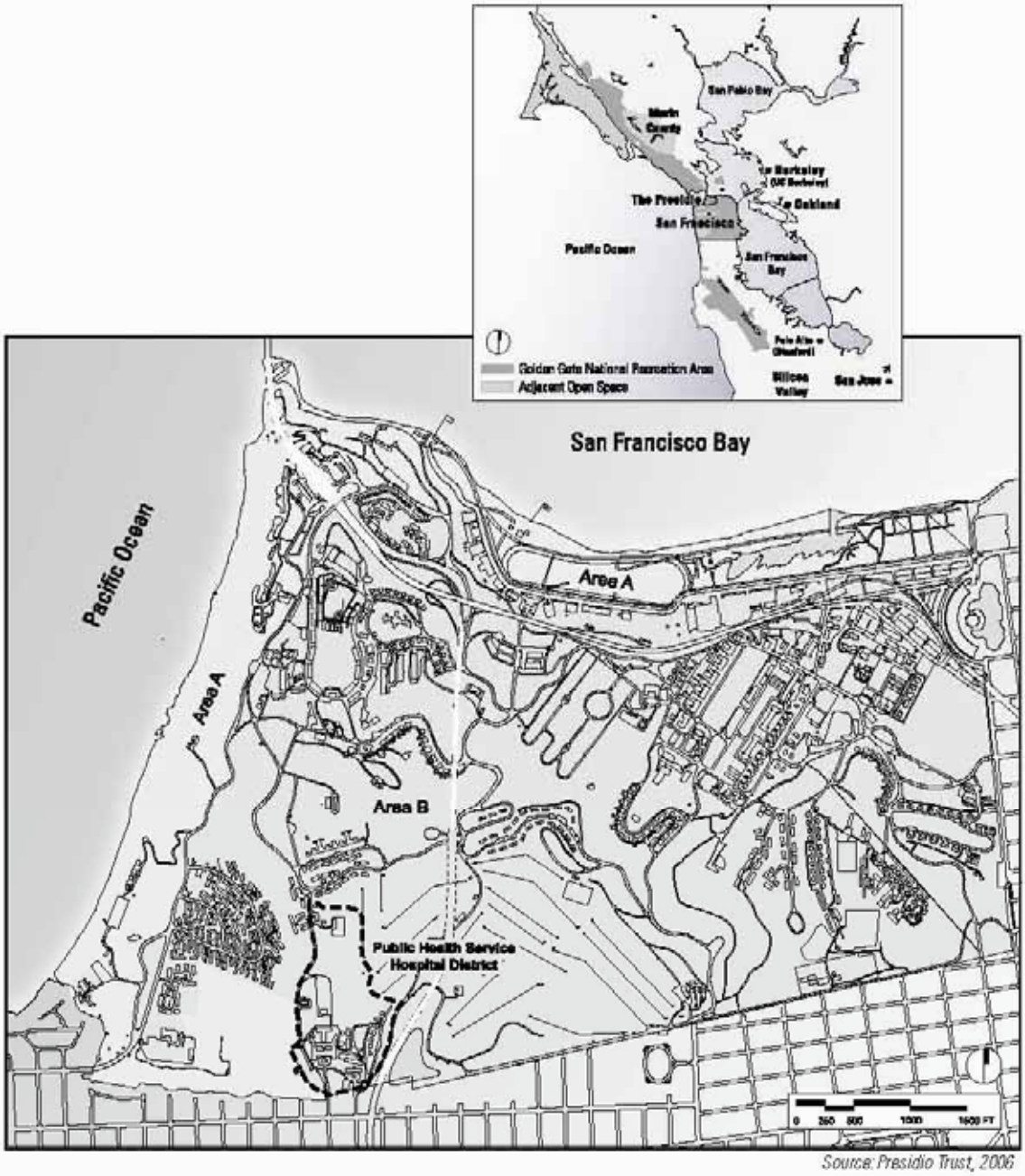
Biology

Page 234, Section 3.12.2.3, first paragraph – This paragraph states that up to 308 residential units will be located on the lower plateau and possibly 13 residential units on the upper plateau. This is contradicted by the Project description and in particular Table 4 on page 47 which states that there would be a maximum of 350 units; 337 on the lower plateau and 13 on the upper plateau. Please correct figures and verify that the impact analysis doesn't change with the addition of additional units and population.

3 Directory of Responses to Comments

This section lists the names of parties that made comments on the Draft SEIS and provides a directory of where each submitter's individual comments are responded to in the document. All responses are coded to 17 general topic headings (e.g., Transportation, code "TR") and to specific comments and responses within a topic. For example, Transportation comments are grouped into 34 general issues, coded TR-1 through TR-34. For each issue, comments are briefly summarized and the summary is followed by a response. For example, Response TR-3 immediately follows the comment summary for TR-3.

In the directory below, comments are listed in parentheses by the two-letter topic code and the issue number (e.g., BR-3, PN-1, FI-4). The number after each comment is the page number where the response is located. The directory only refers to the principal points raised by commenters, i.e., commenters should refer directly to the Final SEIS document for comments requesting minor text modifications or clarification of information in the Draft SEIS. Commenters are also encouraged to review other responses that may also provide information and guidance.



Source: Presidio Trust, 2006

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