

4.3.1 Consistency with Approved Plans and Policies

4.3.1.1 GENERAL OBJECTIVES OF THE GMPA AND PURPOSES OF GGNRA ACT

This alternative is consistent with the General Objectives of the GMPA, which are identified in Section 1.1.5 of this document. Foremost, it is consistent with the General Objective of sustaining the Presidio indefinitely, both economically and physically, through the development team's organizational and financial capabilities to undertake capital investments, operate programs, and make contributions to help preserve the park's unique historic and natural qualities. This alternative is consistent with meeting the Trust Act's financial self-sufficiency mandate and the requirement that the Trust give priority to tenants that enhance the financial viability of the Presidio.

Removal of both the LAMC and LAIR buildings, modern structures that block view corridors and are architecturally non-distinctive, would be consistent with the General Objective of the GMPA to enhance the scenic resources of the Presidio. LAMC and LAIR removal is also consistent with the General Objective of enhancing the Presidio's cultural resources by assisting in rehabilitating historic settings to permit an understanding of the site's significance to the National Historic Landmark district. In furtherance of this General Objective, design and siting of new construction would promote the enhancement and rehabilitation of scenic vistas, including views to the Palace of Fine Arts. New construction to replace the monolithic and architecturally non-distinctive buildings with those better tailored to the mass, scale, color, and materials of other structures in the Letterman Complex and the Presidio would be in keeping with preservation of the character and integrity of the National Historic Landmark district. Consistent with the General Objective to provide for uses that involve stewardship and sustainability, replacement construction would promote principles of sustainable design and technology. Furthering this General Objective, hand-dismantling and salvaging of materials prior to building demolition and conservation and recycling strategies to be employed within the buildings and by tenants would promote and demonstrate conservation practices, including waste reduction and recycling.

Alternative 3's education component, including the culinary institute and conference center, would be consistent with the General Objective of the GMPA to provide for appropriate uses of the Presidio, particularly those that involve education, research, innovation and communication.

Alternative 3 is also consistent with the GMPA's General Objective of addressing the needs of Presidio visitors, tenants, and residents. The hotel would address the needs of park visitors. Further, the housing accommodations for the assisted living and nursing facilities would address the needs of tenants and residents at the site. Tenant programs to reduce automobile use and parking demand would also be consistent with this General Objective.

Alternative 3 is consistent with the purposes of the GGNRA Act, which are identified in Section 1.1.5 of this document. Primarily by focusing more intensive use into an area that has been previously developed, Alternative 3 preserves the recreation area as far as possible in its natural setting. New construction would be



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subject to sound land use planning, including implementation of the Planning Guidelines and design review, so that it would not degrade scenic views and the natural setting.

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This alternative is also consistent with a number of the more specific goals and planning principles of the GMPA. This alternative would foster the GMPA's proposed major directions for the future of the Presidio by perpetuating the site as a building and activity core. New construction would replace the LAMC as permitted under the GMPA since the LAMC would not meet essential program and management needs.

In certain respects, Alternative 3 does not match the GMPA's site-specific plan. This alternative would not promote the GMPA concept for infill construction within the complex but would focus replacement construction within a 23-acre site. Because replacement construction would occur within only a portion of the potential sites that were identified on a preliminary basis as referenced in the GMPA (i.e., outside the historic hospital complex), the alternative would not reinforce the historic hospital complex's courtyard as encouraged by the GMPA. Whereas the GMPA assumed rehabilitation and reuse of LAIR, demolition of the LAIR and other existing buildings that have been demolished or are designated for demolition so as to allow new replacement construction would also increase the total amount of gross square footage of replacement construction within the complex as envisioned in the GMPA from 503,000 to approximately 900,000 square feet. Nevertheless, the GMPA's key restrictions on maximum allowable square footage for the complex (1.3 million square feet) and maximum allowable height of new construction (60 feet) would not be exceeded by this alternative. Furthermore, replacement construction would proceed in accordance with the Planning Guidelines, as included within this document, and design review as recommended within the GMPA to ensure that new construction would be compatible with the adjacent historic buildings and patterns of development.

Alternative 3's education component, including the culinary institute and conference center, would, consistent with the specific program goals of the GMPA, assist in making the Presidio a center for research and learning. Programs conducted at the senior living center would advance intergenerational and collaborative approaches to problem solving and provide opportunities for skills development and lifelong learning. Alternative 3 is also consistent with the GMPA's specific goal of providing accommodations for visitors to create a lively community that contributes to the site. Housing accommodations for the assisted living and nursing facilities would support the GMPA's specific long-term goal of clustering housing opportunities near and within the park's work and major activity centers. Provision of limited retail facilities and services within walking distance of housing, including the restaurants and fitness center, would reinforce the GMPA's neighborhood concept. Further, tenant programs to reduce automobile use and parking demand would further the GMPA's specific goals of reducing automobile use and making the Presidio an environmental model.

Alternative 3 would not, however, implement the specific proposal in the GMPA for the Letterman Complex to serve as a science and education center devoted to issues of health, life and earth sciences. Since to date no suitable tenant has been identified for the site that would adhere to the GMPA's specific proposal, this potential land use conflict cannot be resolved. However, mitigation measures identified in Section 4.7 would be implemented to lessen adverse environmental impacts of this alternative.



4.3 ENVIRONMENTAL CONSEQUENCES: ALTERNATIVE 3 (MIXED-USE DEVELOPMENT)

4.3.1.3 SAN FRANCISCO GENERAL PLAN

While the Presidio is not subject to the General Plan, this alternative would support the General Plan objective to enhance San Francisco's position as a national center for conventions and visitor trade. This alternative would also be consistent with the General Plan guideline to locate overnight accommodations in districts with an overconcentration of hotels at least 300 feet from any existing hotel, motel or bed and breakfast establishment. However, it may not be consistent with the policy to restrict business activities of city-wide importance to districts devoted to and designated for business services.

4.3.2 Solid Waste

4.3.2.1 DISPOSAL OF DEMOLITION DEBRIS OFFSITE

The impacts of this alternative on solid waste sites located in the Bay Area are similar to those discussed for Alternative 2. Due to the demolition of both the LAMC and LAIR buildings as proposed under this alternative, Alternative 3 would generate 80,000 tons of construction debris. This represents 44,600 (55 percent) more tons of debris than Alternative 1. Appropriate landfill sites are available in the Bay Area, landfill operators have sufficient capacity and are willing to accept the material, and at least 50 percent of the debris would be diverted from the landfills. Thus, Alternative 3 is expected to have a less-than-significant impact on regional solid waste disposal facilities.

4.3.3 Water Supply and Distribution

4.3.3.1 IMPACTS OF WATER CONSUMPTION ON BASELINE

Alternative 3 would demand approximately 68,000 gpd of water (Tables 12 and 13). This estimate assumes use of 12,250 gpd of gray water or water captured onsite for landscape irrigation and the proposed "water feature." Since the estimated water consumption of this alternative is well below the 89,000 gpd threshold established for the site, Alternative 3 is not expected to have a negative effect on the Presidio water supply. Nevertheless, the development team should adopt water conservation measures implemented by the Presidio Trust and described in mitigation measure WS-2, *Water Supply- and Demand-Side Solutions to Reduce Cumulative Impacts* to further reduce water consumption.

4.3.3.2 IMPACTS ON FIRE FLOWS

Improvements to the water distribution system may be required to ensure adequate fire flow to new development in the Letterman Complex to meet the Uniform Fire Code, depending on the characteristics of buildings to be constructed (see mitigation measure WS-1, *Fire Flows*).

4.3.4 Schools

4.3.4.1 IMPACT ON CAPACITY AT EXISTING OR NEW SCHOOL SITES

The impacts of this alternative on SFUSD schools would be the same as for Alternative 1 (Table 14). At full occupancy, Alternative 3 would generate 92 schoolchildren between the ages of 5 and 18 who would enroll in



SFUSD schools. Because this level of enrollment is within the existing capacity of SFUSD, Alternative 3 would not result in an adverse impact on SFUSD schools.

4.3.5 Housing

4.3.5.1 INCREASE IN HOUSING DEMAND

At buildout, the additional regional housing demand created by employment associated with Alternative 3 would be 385 housing units (Table 15). The Presidio housing stock would accommodate about 69 percent of this housing demand. Thus, the new demand on regional housing due to implementation of the alternative would be 120 units. This represents less than 0.5 percent of the estimated new housing construction between 2000 and 2010 (Association of Bay Area Governments 1998), and less than 1 percent of the currently vacant units in the Bay Area (California Department of Finance 1998). Distributed by sub-region in the Bay Area, this new demand would be 66 units in San Francisco, 24 units in the East Bay, 20 units in the North Bay; and 10 units on the Peninsula. The potential new housing demand created by employment associated with this alternative would not have a significant effect on the regional housing market since it represents an insignificant percentage (less than 1 percent) of the total number of vacant housing units.

This alternative would incrementally contribute to the Presidio housing demand, which represents a small portion of the employment-related housing demand increases in San Francisco and the Bay Area. However, given the short supply of affordable housing in the city, there would be an adverse impact from any unmet affordable housing demand. To limit the demand for affordable units in San Francisco, the Presidio Trust offers reduced rental rates to Presidio employee and tenant households with gross household incomes of less than \$45,000. As Presidio buildings are reoccupied and park programs and activities are established, the need for additional onsite housing, including affordable housing, would be analyzed based on actual employment patterns and related housing demands associated with building uses.

4.3.6 Medical Research

4.3.6.1 IMPACT ON MEDICAL RESEARCH

As described in Section 3.8, there is no evidence of significant demand for medical research facilities at the Letterman Complex despite good faith efforts to solicit proposals for such use. Therefore, no adverse impact on medical research facilities is anticipated.

4.3.7 Traffic and Transportation Systems

Under Alternative 3, the existing roadway network within the 23-acre site would be maintained. Improvements to the intersection(s) of Lyon Street/Richardson Avenue/Gorgas Avenue would allow for left turns into the Letterman Complex from westbound Richardson Avenue. The Gorgas Avenue Gate would be the primary entrance, with the Lombard Street Gate serving as a secondary entrance. Alternative 3 would also include



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improvements to the pedestrian and bicycle circulation network within the complex, as well as improved connections to adjacent areas. Alternative 3 assumes a total of 1,690 parking spaces within the site.

4 . 3 . 7 . 1 A D D I T I O N A L T R A F F I C V O L U M E S

Alternative 3 would generate 4,460 external (i.e., to areas outside the Presidio) weekday daily vehicle-trips, and 430 vehicle-trips during the p.m. peak hour into and out of the Presidio (Table 16). Of the 430 p.m. peak-hour vehicle-trips generated by Alternative 3, 120 would be inbound and 310 would be leaving the site (Table D-19 in Appendix D). The trip generation levels used assume that the inn/retreat would function largely as a longer-stay conference facility.

Between existing and 2010 conditions, the Mason Street Gate would experience an increase of 350 vehicles during the p.m. peak hour, with project-related traffic comprising 11 percent of this increase. Alternative 3 would contribute the majority of the traffic volume increase at the Gorgas Avenue Gate. Traffic volumes at this gate would increase by 490 vehicles during the p.m. peak hour, with the project-generated traffic comprising 57 percent of this growth. The existing p.m. peak-hour traffic volumes at the Lombard Street Gate would be increased by 400 vehicles, and 10 percent of this increase would be due to new development within the 23-acre site. The existing p.m. peak-hour traffic volumes at the Presidio Boulevard Gate would increase by 210 vehicles, with the project-related traffic comprising 33 percent of this increase (Table 17).

4 . 3 . 7 . 2 I M P A C T S O N I N T E R S E C T I O N O P E R A T I N G C O N D I T I O N S

Currently, during the p.m. peak hour, two of the study intersections operate at LOS C, four intersections operate at LOS B and one intersection operates at LOS A (Table 4). Under Alternative 3, three of the study intersections (Presidio Boulevard/Letterman Drive/Lincoln Boulevard, Mason Street/Marina Boulevard/Lyon Street, and Doyle Drive/Marina Boulevard/Lyon Street) would operate acceptably at LOS C during the p.m. peak hour (Table 18). Impacts to nearby intersections would be similar to Alternative 2 (Table 18). The intersections of Lombard Street/Lyon Street and Presidio Boulevard/Lombard Street would fail, operating at LOS F and LOS E, respectively. Recommended improvements as described in Mitigation Measures TR-2, *Lombard Street/Lyon Street Intersection Improvements*, and TR-3, *Lombard Street/Presidio Boulevard Intersection Improvements*, in Section 4.6.6 and illustrated in Figures 16 and 17 would improve the operating conditions at the intersection of Lombard Street/Lyon Street from LOS F to LOS B and at the intersection of Presidio Boulevard/Lombard Street from LOS E to LOS D.

4 . 3 . 7 . 3 I N C R E A S E D P A R K I N G D E M A N D

Alternative 3 assumes a parking supply of 1,690 parking spaces. Alternative 3 parking demand is estimated to be 1,280 spaces, with the office uses accounting for the majority of the total parking demand (65 percent) at the 23-acre site. The parking demand of 1,280 parking spaces for Alternative 3 land uses would be substantially less than the proposed supply of 1,690 spaces. Therefore, there would be no significant impact on parking in Area A or adjacent neighborhoods. As shown on Table D-11 in Appendix D, weekend parking demand would be only 46 percent of weekday demand, therefore substantial parking would be available for recreational uses on weekends.



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4.3.7.4 IMPACTS ON PEDESTRIAN AND BICYCLE FACILITIES

The office and inn/retreat/conference facilities proposed as part of Alternative 3 would increase the number of pedestrians and bicyclists within and in the vicinity of the Letterman Complex. Alternative 3 would generate 180 new pedestrian and bicycle trips during the p.m. peak hour. These trips would be accommodated within the existing pedestrian and bicycle network, as well as the facilities that would be constructed as part of the development.

The impacts associated with improvements at the Lyon Street/Richardson Avenue/Gorgas Avenue intersection (mitigation measure TR-1) on the citywide bicycle network are described under Alternative 1. Relocating a portion of the city's bicycle route 4 as discussed in mitigation measure TR-6 would reestablish this connection.

Implementation of recommended vehicular capacity improvements at the Lombard Street Gate may require adjustment of routes and physical improvements to facilitate access for bicycles currently entering the Presidio via the city's bike route 4 (relocated to Chestnut Street, see mitigation measure TR-6) and bike route 6 (Greenwich Street). The current Presidio Trails and Bikeways Study will consider alternatives to the current access on Lombard Street to include widening the current pedestrian walkway at the Lombard Street Gate, re-establishing the historic opening of the Presidio perimeter wall at Greenwich Street (subject to additional environmental review, including Section 106 compliance), relocating bike route 4 to Gorgas Street or creating an expanded bicycle and pedestrian path from the Lombard Street Gate (see Figure 18).

4.3.7.5 INCREASED DEMAND FOR PUBLIC TRANSPORTATION

The 130 p.m. peak-hour transit trips generated by Alternative 3 would be accommodated on the six existing MUNI bus lines that serve the Presidio. The 29-Sunset and the 82X-Levi Plaza Express are expected to carry the greatest number of transit trips generated by Alternative 3. Planned improvements to transit service to the Presidio, including a peak-period express bus service, more frequent service on MUNI's 29-Sunset line, and the shuttle service to BART, MUNI Metro and the San Francisco Airport as proposed as part of Alternative 3, would also serve to accommodate the increase in transit demand.

The average passenger load on Golden Gate Transit transbay buses during the a.m. and p.m. peak hours is about 30 passengers per bus, and there are about 120 buses per hour during the a.m. peak hour and about 110 buses per hour during the p.m. peak hour for about 23 different transbay routes (Golden Gate Bridge, Highway and Transportation District 1997). Alternative 3 would generate 18 transit trips to the North Bay in the p.m. peak hour. If these project-generated passengers were distributed across the 23 Golden Gate Transit routes proportionally to the existing distribution of passengers across routes, the project would add a maximum of two passengers to each route. Even if all of the passengers added to a single route were on the same bus, the estimated passenger load would not exceed the bus capacity for any one line.

4.3.7.6 IMPACTS OF TRANSPORTATION DEMAND MANAGEMENT MEASURES

In addition to the TDM plan elements described in Alternative 1, the following TDM measures would be included as part of Alternative 3 to encourage non-automobile modes and minimize parking demand:

- Guaranteed-ride-home program
- Shuttle bus service to BART and MUNIMetro



- Car-sharing
- Flex-time policies
- Telecommuting policies
- Inn/retreat airport shuttle
- Onsite support services
- Pedestrian and bicyclist amenities such as onsite showers and changing rooms
- Constrained parking supply to match modal goals
- Preferential carpool/vanpool parking
- Providing monetary incentives to not drive

These TDM measures would support the transit use and discourage single-occupant auto use by office employees by providing incentives for carpooling and not driving (e.g., preferential carpool parking, constraining parking supply, providing monetary incentives and guaranteed-ride-home programs). The shuttle bus to BART and MUNIMetro would encourage transit use and reduce the number of visitors that would drive to the Presidio. The car-sharing program would provide employees the flexibility of using transit, bicycling or walking, while having a vehicle available when needed. Guaranteed ride home, flextime and telecommuting policies would reinforce transit use by allowing employees to adjust their schedules or extend their workdays beyond their normal work hours. The airport shuttle would reduce the need for conference center and other inn/retreat guests to rent a car for trips in the San Francisco area.

A TDM program, as described in mitigation measure TR-8, would be developed that would establish specific performance targets and a monitoring and reporting process.

4.3.7.7 CONSTRUCTION IMPACTS

The impacts associated with additional construction-related traffic on the local and regional traffic network are described under Alternative 1. A construction traffic management plan, as discussed in mitigation measure TR-5, would be developed to provide specific routes and other mitigation measures to minimize traffic impacts.

4.3.8 Cultural Resources

4.3.8.1 EFFECT OF REMOVING LAMC/LAIR AND ADDING NEW CONSTRUCTION

Under this alternative, LAMC and LAIR would be removed and replacement construction of 900,000 square feet would be built. In contrast to the current centralized building layout of LAMC and LAIR, replacement buildings would be lower in height, distributed across the 23 acres, and would complement historic patterns of development found elsewhere around the complex. The Planning Guidelines, finalized under this EIS, and Design Guidelines for new construction would be applied to new construction to achieve a contextual and compatible approach to architecture and site planning within the historic setting. However, replacement construction on the 23-acre site would foreclose the opportunity for the construction of new infill buildings



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within the adjacent historic hospital complex as recommended in the GMPA. Therefore, this alternative would preclude enhancing the campus-like setting of the historic landscape and unifying the disjointed remnant historic building cluster. This would constitute an adverse effect on the adjacent historic hospital complex.

Building Massing and Scale – New construction would be compatible with the historic setting through elements of massing, scale and height. The buildings would have narrow rectilinear shapes, which are compatible with existing buildings found throughout the Presidio. The primarily three- and four-story buildings with punched openings, ground floor entries, and shaped roofs would be in keeping with the historic setting. These characteristics comply with the Planning Guidelines objective for compatible massing and scale.

O’Reilly Greensward – The siting of new buildings close to O’Reilly Avenue would not follow the Planning Guidelines’ recommendation for a “greensward” along O’Reilly Avenue. In addition, interconnecting the buildings would create an edge that is long and impermeable. These actions would create an adverse effect on the adjacent historic structures. Attention would be given to refining this edge of the site during design review to minimize this adverse effect and make the site design more consistent with the Planning Guidelines’ objectives.

Site Circulation – Under this alternative, a pedestrian walk proposed at Torney Avenue would create a major east/west circulation route through the site. In addition, a new road at the eastern edge of the 23-acre site would allow circulation in a north/south direction. Both of these would improve the connection from the 23-acre site to the adjacent historic hospital complex. Additional circulation connections outlined in the Planning Guidelines would be considered during the design development and review process. For example, the axis of Thornburg Avenue and Edie Road would extend visually eastward into the 23-acre site, but no physical path would be created. While this may be inconsistent with the Planning Guidelines, it would not constitute an adverse effect on the historic setting.

4 . 3 . 8 . 2 E F F E C T O N E X T A N T C U L T U R A L L A N D S C A P E F E A T U R E S

Actions associated within this alternative would have a beneficial effect on the cultural landscape and the National Historic Landmark district as described in Alternative 2.

4 . 3 . 8 . 3 E F F E C T D U E T O R E M O V A L O F T E N N I S C O U R T (S T R U C T U R E 1 1 4 7)

The adverse effect of removal and replacement of this structure is discussed under Alternative 2.

4 . 3 . 8 . 4 E F F E C T O N T H E P R E S I D I O W A L L

The effect of the proposed re-introduction of a pedestrian entrance through the Presidio wall along Lyon Street at the Chestnut Street intersection is discussed under Alternative 2.

4 . 3 . 8 . 5 E F F E C T S D U E T O I N T E R S E C T I O N A N D R O A D W A Y I M P R O V E M E N T S

The effects of intersection improvements would be similar to those described under Alternative 2. Under this alternative, however, Letterman Drive would not be removed and Torney Avenue would be extended only as a pedestrian path and not as a vehicular road corridor, as in Alternative 2. While these roadway improvements would not be inconsistent with the Planning Guidelines, this would not constitute an adverse effect on the historic setting. Changes to internal circulation networks and intersections within the 23-acre site would be made during design review to more closely follow the Planning Guidelines.



4 . 3 . 8 . 6 V I S U A L I M P A C T S

This alternative, with the removal of LAMC and LAIR, the large paved parking area that occupies the eastern half of the 23-acre site, and the introduction of lower-scaled new construction would enhance the visual integrity of the Letterman Complex. The removal of the 10-story LAMC building, and replacement with new construction limited to 60 feet in height, would substantially improve the views from many vantage points within the Presidio. A central landscaped open space would provide views of the Palace of Fine Arts, which would enhance the scenic qualities of the 23-acre site (refer to Figure 22). Views into the 23-acre site from Lyon Street would be screened by the existing windrow.

The siting of buildings near Lombard Street Gate would alter the visual setting at this important entry point. New construction would reinforce the historic pattern of development for the Letterman Complex, which included buildings very close to the Lombard Street Gate. Sufficient vegetative screening and building setbacks would be provided to minimize these impacts on entry views. The buildings would also be staggered to allow for additional vegetative screening. Views from Lombard Street Gate toward the 23-acre site would produce a new sense of arrival into the Presidio similar to the historic pattern of buildings at this edge.

This alternative does not provide north-facing views into the center of the site or to the Palace of Fine Arts from its southern edge. Modifications to the site plan and building design would be considered during design review to enhance these views.

The historic view corridor at Thornburg Road would be preserved. In addition, the historic view corridor at Torney Avenue, which is currently blocked, would be restored. However, this alternative would not preserve the existing historic view corridor at Edie Road. Modifications would be made during design review to avoid negative visual impacts on this view corridor.

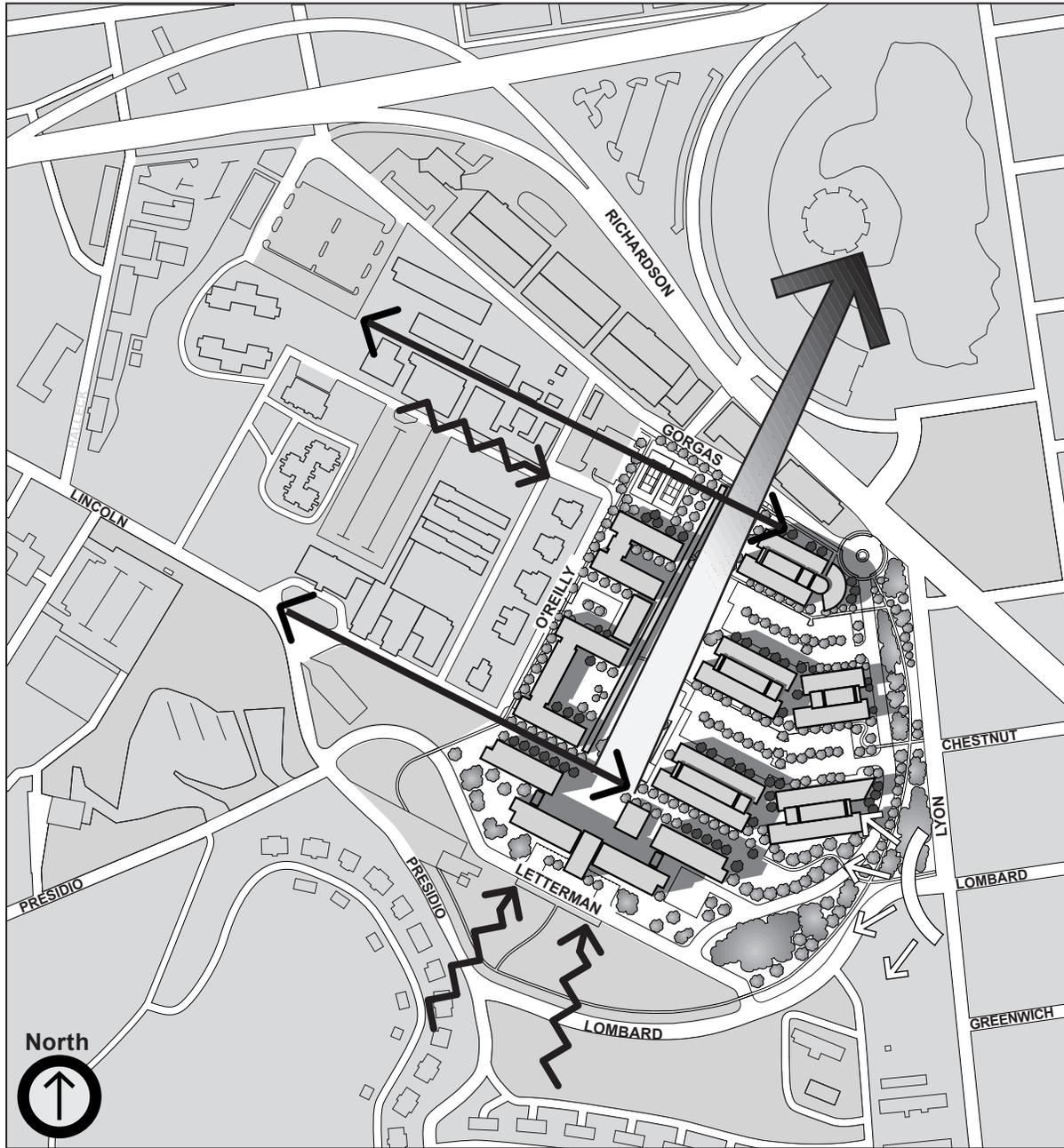
4 . 3 . 8 . 7 B E N E F I C I A L E F F E C T O N V I S I T O R E X P E R I E N C E

This alternative would have a beneficial effect on the visitor experience. A central village commons would be developed as a public open space for visitors to enjoy. Replacement construction would provide public gathering places and locations for programs open to the public. The variety of uses would create a lively community for residents, tenants and visitors. A lodge would provide conferencing, training and educational programs that would be open to Presidio visitors. This would be complemented by restaurants and convenience services available to the public.

The 23-acre site, as an integral part of the Letterman Complex, would be one of many areas throughout the Presidio which would “tell the story” of the Presidio in support of the five interpretive themes identified in the GMPA. Beneficial actions throughout the Letterman Complex would include the rehabilitation of building 558 as a visitor information center, the introduction of three information/orientation kiosks, public lobby spaces with interpretive information about the complex, and interpretive displays incorporated into the landscape at key spots. These improvements would increase public access and visitor opportunities considerably over what exists today for visitors.



4.3 ENVIRONMENTAL CONSEQUENCES: ALTERNATIVE 3
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-  Key Scenic Views and View Corridors
-  Historic View Corridors
-  Obstructed Views
-  Views from Entry Point

Figure 22.
Visual Impacts of
Alternative 3



4.3 ENVIRONMENTAL CONSEQUENCES: ALTERNATIVE 3 (MIXED-USE DEVELOPMENT)

4.3.8.8 EFFECT ON ARCHEOLOGICAL PROPERTIES

As discussed in Alternative 2, ground-disturbing activities would have the likelihood of encountering archeological resources. An Archeological Management Assessment and Monitoring Program (described in Appendix F) would be employed to discover, document, protect, and manage the archeological record at the Letterman Complex. As a result of these practices, an adverse effect on archeological properties would be avoided.

4.3.9 Air Quality

4.3.9.1 SHORT-TERM DEMOLITION/CONSTRUCTION IMPACTS

The impacts during demolition of buildings and replacement construction at the 23-acre site would be similar to those shown under Alternative 2. Compliance with the applicable requirements for asbestos control and incorporation of mitigation measures AQ-1, *BAAQMD Control Measures*, and AQ-2, *Demolition of Existing Buildings* into the alternative would reduce the effects of demolition and construction activities to a less-than-significant level.

4.3.9.2 LONG-TERM REGIONAL OPERATION IMPACTS

By 2010, Alternative 3 would result in an increase of up to approximately 5,100 internal and external vehicle trips per day. Based on URBEMIS7G modeling results, increased vehicle trips associated with the alternative would generate approximately 49 lb/day of ROG, 75 lb/day of NO_x, 32 lb/day of PM₁₀, and 561 lb/day of CO. These emission rates are summarized in Table 22. Alternative 3 would not result in regional operational emissions exceeding any of the BAAQMD's significance thresholds for ROG, NO_x, or PM₁₀.

Similar to the impacts under Alternative 1, direct and indirect emissions from the use of electricity and natural gas due to Alternative 3 would not be significant when compared to the emissions caused by project-related traffic, and the alternative would not have the potential to expose nearby receptors to toxic air contaminants.

4.3.9.3 LONG-TERM LOCAL OPERATIONS IMPACTS

Localized CO impacts due to project traffic are described under Alternative 1. Because Alternative 3 2010 traffic would result in fewer than 1,680 vehicles in the p.m. peak hour through the Lombard Street Gate, the localized CO concentrations for Alternative 3 would be less than 7.9 ppm on a 1-hour basis and less than 5.4 ppm on an 8-hour basis. These localized CO concentrations would not exceed the state ambient air quality standards for CO.

4.3.10 Noise

4.3.10.1 SHORT-TERM DEMOLITION/CONSTRUCTION NOISE IMPACTS

The impacts during demolition and construction of the Letterman Complex would be similar to those shown under Alternative 2. Incorporation of mitigation measure NO-1, *Reduction of Construction Noise* into Alternative 3 would reduce the effects of demolition and construction activities to a less-than-significant level for residents, tenants and recreational users outside the Letterman Complex. However, construction noise



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would have an unmitigable, potentially significant short-term impact on occupants and recreational users internal to the Letterman Complex.

4 . 3 . 1 0 . 2 L O N G - T E R M T R A F F I C N O I S E I N C R E A S E S

The impacts of traffic noise caused by Alternative 3 would be similar to those described under Alternative 1. Traffic volumes for Alternative 3, including peak traffic volumes for Gorgas Avenue, would be less than those shown for Alternative 1, and the associated noise level increases would be subsequently lower. New lodging and assisted living uses within the Letterman Complex proposed with Alternative 3 would be sensitive receptors, but would be designed with sufficient noise insulation for compliance with Title 24. As such, the traffic noise increases associated with Alternative 3 would not cause a significant impact.

4 . 3 . 1 0 . 3 L O N G - T E R M S T A T I O N A R Y S O U R C E N O I S E I M P A C T S

The impacts of stationary sources of noise associated with Alternative 3 would be similar to those shown under Alternative 1. No significant long-term stationary source noise impacts are expected.

4.3.11 Cumulative Impacts

4 . 3 . 1 1 . 1 S O L I D W A S T E

Cumulative impacts due to the disposal of demolition debris under this alternative would be the same as Alternative 2.

4 . 3 . 1 1 . 2 W A T E R S U P P L Y

The Lobos Creek watershed would be insufficient to supply the in-stream flow requirement necessary to maintain natural streambed characteristics and meet peak Presidio daily demands of 1.66 mgd with this alternative and the other projects listed in Table 9 that are within the Presidio (BAE 1998a). Alternative 3 and the other identified projects within the Presidio would contribute to a net cumulative peak shortfall of approximately 269,000 gpd on the Presidio-wide water supply due to excess demand (BAE 2000). However, water supply- and demand-side measures and instream flow monitoring described in mitigation measures WS-2, *Water Supply- and Demand-Side Solutions to Reduce Cumulative Impacts*, WS-3, *Instream Flow Monitoring to Reduce Cumulative Impacts*, and WT-1, *Water Reclamation Plant to Reduce Cumulative Impacts*, would result in a water savings of approximately 320,000 gpd which would minimize cumulative impacts on the system and baseline stream flow maintained in Lobos Creek.

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

4 . 3 . 1 1 . 3 S C H O O L S

The cumulative impacts to SFUSD resulting from this alternative would be similar to Alternative 1.



4 . 3 E N V I R O N M E N T A L C O N S E Q U E N C E S : A L T E R N A T I V E 3
(M I X E D - U S E D E V E L O P M E N T)

4 . 3 . 1 1 . 4 H O U S I N G

This alternative and the other projects listed in Table 9 would add 3,261 employees to the local economy. The new development within the 23-acre site accounts for 2,000 jobs, or 61 percent of this total. This growth in employment is estimated to require 628 new housing units (BAE 2000). The listed projects include provision of 1,331 new housing units (1,304 renovated units on the Presidio and 27 new units in the Marina District.) The housing demand resulting from the projects would be more than offset by the housing units added to the local supply, largely by reactivation of housing at the Presidio. Therefore, cumulative demand under this alternative would not contribute to employment-related housing demand increases in the surrounding neighborhood or city.

4 . 3 . 1 1 . 5 T R A F F I C A N D T R A N S P O R T A T I O N S Y S T E M S

The traffic generated by land uses under this alternative would contribute to the expected increases in cumulative traffic volumes on adjacent local and regional roadways. Alternative 3 would contribute 24 percent of the total p.m. peak-hour traffic resulting from these cumulative projects (Table 19). The combined cumulative projects, including Alternative 3, would generate increased traffic volumes throughout the Presidio. The cumulative projects would create 330 additional vehicles on Lincoln Boulevard during the p.m. peak hour, and Alternative 3 would make up about 13 percent of the additional traffic. Similar to Alternative 2, the cumulative increase in traffic would cause significant impacts at two of the project impact zone intersections. However, mitigation measures TR-2, *Lombard Street/Lyon Street Intersection Improvements*, and TR-3, *Lombard Street/Presidio Boulevard Intersection Improvements*, would improve the LOS at these intersections to acceptable levels (LOS D or better), as shown in Table 20.

The parking demand generated by cumulative projects, including Alternative 3, is estimated to be 4,392 spaces, or about 170 spaces more than Alternative 2, as shown in Table 21. Alternative 3 would comprise about 34 percent of the total cumulative parking demand within the Presidio and 29 percent of the total cumulative parking demand within the project impact zone. The proposed parking supply within the 23-acre site in Alternative 3 would exceed the projected parking demand, as discussed in Section 4.3.7.3. The 8,390 parking spaces provided within the Presidio (as described in the 1994 GMPA), would be adequate for the expected cumulative parking demand within the Presidio. The parking impacts outside of the Presidio would be comparable to those described in Alternative 2.

The alternative's contribution to cumulative growth would have a minor cumulative effect on local and regional traffic growth and related congestion, and would be similar to Alternative 2.

4 . 3 . 1 1 . 6 C U L T U R A L R E S O U R C E S

Under this alternative, LAMC and LAIR would be removed and replacement construction of 900,000 square feet would be built. In contrast to the current centralized building layout of LAMC and LAIR, replacement buildings would be lower in height, distributed across the 23 acres, and would complement historic patterns of development found elsewhere around the complex. The Planning Guidelines, finalized under this EIS, and Design Guidelines for new construction would be applied to new construction to achieve a contextual and compatible approach to architecture and site planning within the historic setting. However, replacement construction on the 23-acre site would not allow for the construction of new infill buildings within the adjacent historic hospital complex as recommended in the GMPA. Therefore, this alternative would not contribute to cumulative beneficial effects on the National Historic Landmark district.



4.3 ENVIRONMENTAL CONSEQUENCES: ALTERNATIVE 3 (MIXED-USE DEVELOPMENT)

4.3.11.7 AIR QUALITY

Proposed development under Alternative 3 and the projects identified in Table 9 would contribute to a cumulative increase in vehicle trips on the region's roadways and would contribute to cumulative increases in regional emissions. The cumulative operational emissions would cause localized impacts at congested intersections in the vicinity of the projects, but the resulting impacts would not be expected to cause local violations of ambient air quality standards. Anticipated cumulative increases in vehicle trips would also result in increases to region-wide emissions of ozone precursors (including NO_x and ROGs) and CO. The proposed development would cause emissions of ozone precursors that fall below the thresholds set forth in federal regulations for conformity determinations (as shown in Table 22). Because emissions of ozone precursors would be less than the applicability thresholds, a conformity determination is not necessary for ozone. Emissions of CO that would be caused by the cumulative scenario under Alternative 3 are accounted for in the current maintenance plan for CO, as discussed in Section 5.4.2. Because the projects are in conformance with regional air quality plans, no further conformity analysis is necessary, and no significant cumulative impacts would occur.

4.3.11.8 NOISE

Demolition and construction activities under Alternative 3, in combination with the project to reconstruct Doyle Drive, would cause short-term cumulative noise impacts if the two projects were to be under construction at the same time. Long-term cumulative impacts around the Letterman Complex would primarily result from increased traffic on Doyle Drive (U.S. Highway 101). The long-term cumulative effect of Alternative 3 and other projects within the Presidio and nearby portions of San Francisco would be increased traffic noise on most of the roads internal and external to the Presidio.

Because the surroundings are dominated by traffic noise in the existing conditions, approximately two-fold increases in traffic would have to result from cumulative development in order to cause increases in traffic noise that would be noticeable to most people. Cumulative development with Alternative 3 would cause peak-hour traffic increases along Lombard Street, inside the Presidio, that could result in noticeable noise increases, but no noise sensitive receptors are located along this segment. None of the roadway segments near noise sensitive receptors would experience greater than two-fold peak-hour traffic increases. The conclusion in the GMPA Final EIS that long-term cumulative traffic-induced noise levels would increase due to increases in vehicle volumes remains applicable; however, the increases near sensitive receptors would not be considered significant. No significant cumulative noise impacts are expected.

4.3.12 Unavoidable Adverse Effects

The following impacts are identified as potentially significant and for which there are no mitigating measures or that would not be mitigated to a level of insignificance.

Housing – This alternative would incrementally contribute to the unmet affordable housing demand in the city of San Francisco. Reduced rental rates offered to Presidio employee and tenant households with gross household incomes of less than \$45,000 would offset some of this demand.



Cultural Resources – To the extent new construction would not conform to the Planning Guideline recommendations, the following departures would have a potential adverse effect on the historic and visual setting:

- Removal of LAMC and LAIR and replacement construction consistent with Planning and Design Guidelines would not allow for infill construction as recommended in the GMPA which would have an adverse effect on the adjacent historic hospital complex.
- The siting and length of buildings along O'Reilly Avenue would have an adverse effect on adjacent historic structures.
- The removal of the two historic tennis courts would have an adverse effect on these historic structures.
- The historic view corridor at Edie Road would be blocked by the proposed building layout.

Noise – Short-term use of impact tools and demolition activities would be a source of increased noise to occupants and passive recreational users within the Letterman Complex. Mitigation measures proposed to reduce intrusions would reduce noise impacts but not to a level of insignificance to those closest to (i.e., within 250 feet from) construction equipment.

4.3.13 Relationship of Short-Term Uses of the Environment and Maintenance and Enhancement of Long-Term Productivity

Use of the site for offices, a hotel, conference center, senior assisted living and other development would preclude other long-term management possibilities for the 23 acres. This use would occur within an intensively used area within the northern part of the Presidio which would allow areas in the south and along the coast to remain more natural and experience less activity and development. Reinforcement of this overall use pattern would minimize impacts on the productivity of park resources.

Use of the site for a mixed-use development would not affect any park ecosystem. Improvements to existing infrastructure would be considered sustainable actions that are expected to improve the operation of systems. Through implementation of the Planning Guidelines for the project, the Presidio Trust would promote environmental protection and sustainable design and encourage technologies and practices that would reduce environmental impacts or produce environmental benefits in water conservation and reclamation, energy conservation and transportation.

4.3.14 Irreversible or Irretrievable Commitments of Resources

The mixed-use development would be designed and constructed to minimize consumption of energy and development of non-renewable fuels. Renewable sources of energy and new developments in energy-efficient technology, including recycling of materials and waste, would be fully explored and implemented to the extent possible. Although new development could be restored to previous conditions over time, the use of land,



4 . 3 E N V I R O N M E N T A L C O N S E Q U E N C E S : A L T E R N A T I V E 3
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construction materials, energy, and financial resources to implement the alternative would, in a practical sense, be an irretrievable commitment of resources.

Archeological resources would be avoided where possible and historic resources would be protected. Where this is not possible, disturbance would be mitigated through recovery of cultural information and significant artifacts.

