

4.6.1 Consistency with Approved Plans and Policies

4.6.1.1 GENERAL OBJECTIVES OF THE GMPA AND PURPOSES OF GGNRA ACT
Alternative 6 is inconsistent with the General Objective of the GMPA to provide for appropriate uses of the Presidio. General office use does not ensure uses that involve stewardship and sustainability, cross-cultural and international cooperation, community service and restoration, health and scientific discovery, recreation, the arts, education, research, innovation, and/or communication.

Alternative 6 is also inconsistent with the GMPA's General Objectives to enhance and preserve the resources of the Presidio, to increase open space and consolidate developed space, or to provide for appropriate uses of the Presidio. Mothballing the LAMC would not contribute to the significance of the National Historic Landmark district, would not restore historic settings, would not allow for creation of open space and consolidation of developed space, and would not enhance the cultural, natural, recreational, or scenic resources of the Presidio. It also fails to meet other General Objectives; it would not promote visitor use and enjoyment, simplify the roadway network, or encourage sustainable design and conservation practices. Nor would it address the needs of Presidio visitors, tenants or residents, although it would not increase impacts on neighboring communities over the status quo.

This alternative is inconsistent with the GMPA's General Objective to sustain the Presidio economically because it does not allow the Trust to meet the financial planning parameters of the FMP. It therefore prevents the Trust from meeting the congressional directive of the Trust Act to make the Presidio financially self-sustaining by 2013.

Alternative 6 is inconsistent with the purposes of the GGNRA Act. It does not contribute to recreational open space or educational opportunities onsite or consolidate uses that might allow for enhancement of open space elsewhere. Nor does it contribute to enhancement of scenic beauty or natural character.

4.6.1.2 PRESIDIO GENERAL MANAGEMENT PLAN AMENDMENT

This alternative could conflict with the GMPA's major directions for the future of the Presidio and the Letterman Complex, since use of the LAIR may not be related to the park's purpose and the site could lack a major program center. Mothballing the non-historic LAMC would not contribute to the significance of the landmark district. Therefore, this alternative would be inconsistent with the GMPA's objective to restore historic settings. This alternative would leave in place buildings whose architecture and attributes are inconsistent with the surrounding historic buildings and setting. This alternative would not support the following parkwide goals and objectives:

- Promote visitor use and enjoyment.
- Enhance and restore scenic vistas.
- Simplify the roadway network.
- Adopt sustainable design and conservation practices.



4.6 ENVIRONMENTAL CONSEQUENCES: ALTERNATIVE 6 (MINIMUM MANAGEMENT)

4.6.1.3 SAN FRANCISCO GENERAL PLAN

While the Presidio is not subject to the General Plan, this alternative would be inconsistent with the General Plan policy to preserve the open space and natural historic, scenic and recreational features of the Presidio since minimal preservation actions would be taken to restore the historic setting.

4.6.2 Solid Waste

4.6.2.1 DISPOSAL OF DEMOLITION DEBRIS OFF SITE

Under Alternative 6, the LAMC would be “mothballed” and the LAIR would be permitted/leased for office and research use without major rehabilitation. No building demolition would occur and no debris would be generated. Thus, this alternative would have no impact on solid waste sites throughout the Bay Area.

4.6.3 Water Supply and Distribution

4.6.3.1 IMPACTS OF WATER CONSUMPTION ON BASELINE

Alternative 6 would demand approximately 35,000 gpd of water (Tables 12 and 13). Since the estimated water consumption of this alternative is well below the 89,000 gpd threshold established for the site, Alternative 6 is not expected to have a negative effect on the Presidio water supply.

4.6.3.2 IMPACTS ON FIRE FLOWS

Water flows available for fighting fire under this alternative would meet the requirements of the Uniform Fire Code.

4.6.4 Schools

4.6.4.1 IMPACT ON CAPACITY AT EXISTING OR NEW SCHOOL SITES

The impact of this alternative on SFUSD schools would be the same as Alternative 1 (Table 14). At full occupancy, Alternative 6 would generate 92 schoolchildren between the ages of 5 and 18 who would enroll in SFUSD schools. This level of enrollment is within the existing capacity of SFUSD. Therefore, Alternative 6 would not result in an adverse impact on SFUSD schools.

4.6.5 Housing

4.6.5.1 INCREASE IN HOUSING DEMAND

At buildout, the additional regional housing demand created by employment associated with Alternative 6 would be 159 housing units (Table 15). The Presidio housing stock would meet 100 percent of this housing demand. Since the employee housing demand under Alternative 6 can be accommodated at the Presidio, this alternative would not adversely impact the housing market within San Francisco and the surrounding Bay Area.



4.6.6 Medical Research

4.6.6.1 IMPACT ON MEDICAL RESEARCH

Under this alternative, the LAIR building could be leased to a tenant for reuse as a research facility. The impact of possible medical research reuse is described in Alternative 1. If the site were used for other than a medical research facility, the impact would be the same as under Alternative 3.

4.6.7 Traffic and Transportation Systems

Under Alternative 6, the existing roadway network within the 23-acre site would be maintained. No improvements to the intersection(s) of Lyon Street/Richardson Avenue/Gorgas Avenue would be made. The Lombard Street Gate would continue to be the major access gateway, and the Gorgas Avenue Gate would serve as a secondary entrance. Under Alternative 6, no improvements would be made to the pedestrian and bicycle circulation network within the complex, and no additional parking spaces would be provided.

4.6.7.1 ADDITIONAL TRAFFIC VOLUMES

Of the six alternatives, Alternative 6 would generate the fewest trips: 1,960 external (i.e., to areas outside the Presidio) weekday daily vehicle-trips and 220 vehicle-trips during the p.m. peak hour into and out of the Presidio (Table 16). Without geometric improvements to the intersection of Lyon Street/Richardson Avenue/Gorgas Avenue, traffic traveling north on Richardson Avenue would not be able to directly access the site at the Gorgas Avenue Gate, and would most likely use the Lombard Street Gate instead. Therefore, under the existing roadway network, the Lombard Street Gate is expected to carry the greatest percentage of traffic into the 23-acre site, accommodating 46 percent of the inbound traffic during the p.m. peak hour (Table 17). Similarly, because traffic would not be able to turn left directly onto Richardson Avenue, the Gorgas Avenue Gate is expected to carry only half of the outbound traffic on the existing roadway configuration, considerably less than the two-thirds of outbound traffic that would use the Gorgas Avenue Gate if the left turn were provided (Table D-9 in Appendix D).

4.6.7.2 IMPACTS ON INTERSECTION OPERATING CONDITIONS

Currently, during the p.m. peak hour, two of the study intersections operate at LOS C, four intersections operate at LOS B and one intersection operates at LOS A (Table 4). Under Alternative 6, three of the study intersections (Presidio Boulevard/Letterman Drive/Lincoln Boulevard, Mason Street/Marina Boulevard/Lyon Street, and Doyle Drive/Marina Boulevard/Lyon Street) would operate acceptably at LOS C during the p.m. peak hour, and the intersection of Presidio Boulevard/Lombard Street would operate acceptably at LOS D (Table 18). The 220 p.m. peak-hour vehicle trips generated by Alternative 6 land uses at the site would substantially affect the operating conditions at the intersection of Lombard and Lyon streets (Table 18), which would operate at LOS F during the p.m. peak hour. The Presidio Trust would coordinate with the City and County of San Francisco to ensure that funding was obtained and improvements, including signalization and restriping of the eastbound approach to two lanes. The improvements would improve the p.m. peak-hour operating conditions to LOS B.



4.6 ENVIRONMENTAL CONSEQUENCES: ALTERNATIVE 6 (MINIMUM MANAGEMENT)

4.6.7.3 INCREASED PARKING DEMAND AS A RESULT OF PROJECT-RELATED TRIPS

The parking demand of 580 parking spaces for Alternative 6 land uses would be substantially less than the existing supply of 770 spaces, resulting in a surplus of 190 spaces. Since this alternative would not include any changes to the existing parking supply, there would be a surplus of parking at the site. As shown on Table D-11 in Appendix D, weekend parking demand would be only 24 percent of weekday demand, therefore substantial parking would be available for recreational uses on weekends.

4.6.7.4 IMPACTS ON PEDESTRIAN AND BICYCLE FACILITIES

The 80 pedestrian and bicycle trips generated by Alternative 6 would result in minimal increases in pedestrian and bicycle activity in the vicinity of and within the Letterman Complex. The increase in demand would be accommodated within the existing bicycle and pedestrian facilities.

4.6.7.5 INCREASED DEMAND FOR PUBLIC TRANSPORTATION

Alternative 6 would generate 60 p.m. peak hour transit trips that would primarily be accommodated on the 29-Sunset (16 trips) and the 82X-Levi Plaza Express (15 trips).

The average passenger load on Golden Gate Transit transbay buses during the a.m. and p.m. peak hours is about 30 passengers per bus, and there are about 120 buses per hour during the a.m. peak hour and about 110 buses per hour during the p.m. peak hour for about 23 different transbay routes (Golden Gate Bridge, Highway and Transportation District 1997). Alternative 6 would generate nine transit trips to the North Bay in the p.m. peak hour. If these project-generated passengers were distributed across the 23 Golden Gate Transit routes proportionally to the existing distribution of passengers across routes, the project would add a maximum of one passenger to each route. An additional passenger would not cause the passenger load to exceed the bus capacity for any one line.

4.6.7.6 IMPACTS OF TRANSPORTATION DEMAND MANAGEMENT MEASURES

At a minimum, the TDM strategies listed at the beginning of Section 4.1.7 would be incorporated into this alternative to encourage non-automobile modes and reduce parking demand. A TDM program, as discussed in mitigation measure TR-8, would be developed that would establish specific performance targets and a monitoring and reporting process.

4.6.7.7 CONSTRUCTION IMPACTS

Alternative 6 would not result in any substantial construction activity at the site. Traffic impacts would be minimal.

4.6.8 Cultural Resources

4.6.8.1 EFFECT ON HISTORIC BUILDINGS DUE TO BUILDING TREATMENTS

Building and landscape improvements would be minimal because LAMC would be kept out of service and mothballed, and LAIR would be reused. Retaining these structures would not allow for the rehabilitation of the 23-acre site to enhance its historic setting.



4.6 ENVIRONMENTAL CONSEQUENCES: ALTERNATIVE 6 (MINIMUM MANAGEMENT)

4.6.8.2 EFFECT ON EXTANT CULTURAL LANDSCAPE FEATURES

Under this alternative, limited site improvements and rehabilitation would occur. The historic Lyon Street windrow and other remnant historic tree plantings would be maintained and rehabilitated. The Presidio boundary wall and Lombard Street Gate would be preserved and rehabilitated. No major enhancement or restoration projects would be implemented. These actions would not have an adverse effect on the district.

4.6.8.3 EFFECT DUE TO INTERSECTION AND ROADWAY IMPROVEMENTS

No major intersection improvements would be implemented. Critical safety issues would be addressed through ongoing maintenance of the road system, as needed. These actions would not have an adverse effect on the district.

4.6.8.4 VISUAL IMPACT

Since no significant changes to existing site conditions would be made, there would be no change to existing scenic views. Therefore, LAMC would continue to block viewsheds from elsewhere on the Presidio to the 23-acre site. The overall visual quality of the 23-acre site would remain the same and would not be enhanced through site improvements.

4.6.8.5 EFFECT OF VISITOR EXPERIENCE

Under this alternative, the visitor experience would not be greatly expanded or fully realized. The LAMC and LAIR could be occupied by agencies or organizations that would not provide visitor opportunities to the public to the extent that the other alternatives would. However, these organizations would most likely provide some public access and visitor programs that would provide beneficial effects.

4.6.8.6 EFFECT ON ARCHEOLOGICAL PROPERTIES

Under this alternative, there would be no likelihood of encountering archeological resources since no ground disturbing activities would occur.

4.6.9 Air Quality

4.6.9.1 SHORT-TERM DEMOLITION/CONSTRUCTION IMPACTS

Under Alternative 6, the LAMC would be “mothballed” and the LAIR would be permitted/leased for office and research use without major rehabilitation. No building demolition or replacement construction would occur within the Letterman Complex. Thus, this alternative would not cause any air quality impacts due to demolition or construction.

4.6.9.2 LONG-TERM REGIONAL OPERATION IMPACTS

Alternative 6 would result in an increase of up to approximately 2,210 internal and external vehicle trips per day. Based on URBEMIS7G modeling results, increased vehicle trips associated with the alternative would generate approximately 22 lb/day of ROG, 37 lb/day of NO_x, 16 lb/day of PM₁₀, and 265 lb/day of CO. These emission rates are summarized in Table 22. Alternative 6 would not result in regional operational emissions exceeding any of the BAAQMD’s significance thresholds for ROG, NO_x, or PM₁₀.



4 . 6 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 6
(M I N I M U M M A N A G E M E N T)

Similar to the impacts under Alternative 1, direct and indirect emissions from the use of electricity and natural gas due to Alternative 6 would not be significant when compared to the emissions caused by project-related traffic, and the alternative would not have the potential to expose nearby receptors to toxic air contaminants.

4 . 6 . 9 . 3 L O N G - T E R M L O C A L O P E R A T I O N S I M P A C T S

Localized CO impacts due to project traffic are described under Alternative 1. Because year 2010 traffic with Alternative 6 would cause fewer than 1,680 vehicles in the p.m. peak hour through the Lombard Gate, the localized CO concentrations for Alternative 6 would be less than 7.9 ppm on a 1-hour basis and less than 5.4 ppm on an 8-hour basis. These localized CO concentrations would not exceed the state ambient air quality standards for CO.

4.6.10 Noise

4 . 6 . 1 0 . 1 S H O R T - T E R M D E M O L I T I O N / C O N S T R U C T I O N N O I S E I M P A C T S

Under Alternative 6, no building demolition or replacement construction would occur at the Letterman Complex. Thus, this alternative would not cause any impact due to demolition or construction noise.

4 . 6 . 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 6 would be substantially less than those described under Alternative 1. As such, the traffic noise associated with Alternative 6 would not cause a significant impact.

4 . 6 . 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 6 would be similar to those shown under Alternative 1. No significant long-term stationary source noise impacts are expected.

4.6.11 Cumulative Impacts

4 . 6 . 1 1 . 1 S O L I D W A S T E

Because only minimal construction and demolition activities would occur under this alternative, Alternative 6 would not contribute to a cumulative reduction in regional solid waste capacity.

4 . 6 . 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 1.63 mgd with this alternative. Minimum management and uses of all Presidio buildings listed in Table 9 would contribute to a net cumulative peak shortfall of approximately 237,000 gpd on the Presidio-wide water supply due to excess demand (BAE 2000). Water supply- and demand-side measures and instream flow monitoring similar to those described in mitigation measures WS-2, *Water Supply- and Demand-Side Solutions to Reduce Cumulative Impacts*, WS-3, *Instream Flow Monitoring to Reduce Cumulative Impacts*, and WT-1, *Water Reclamation Plant to Reduce Cumulative Impacts*, would be required to minimize cumulative impacts on the system and baseline stream flow maintained in Lobos Creek.



**4 . 6 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 6
(M I N I M U M M A N A G E M E N T)**

Under this alternative, projects within the surrounding area would still occur, resulting in increased water consumption, but according to the city, not in excess of amounts expected and provided for in this area. In general, the projects represent replacement or renovation of existing facilities previously served by the city. New construction would be subject to current city of San Francisco water conservation code requirements.

4 . 6 . 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 . 6 . 1 1 . 4 H O U S I N G

This alternative and other projects listed in Table 9 would add 2,089 employees to the local economy. The leasing and use of the LAIR and LAMC accounts for 828 jobs, or 40 percent of this total. This growth in employment is estimated to require 402 new housing units (BAE 2000). Under this alternative, 1,331 new housing units (1,304 renovated units on the Presidio and 27 new units in the Marina District) would be added to the local supply. Because housing demand would be more than offset by the housing units added to the local supply (largely by reactivation of the housing units at the Presidio), cumulative demand under this alternative would not contribute to employment-related housing demand increases in the surrounding neighborhood or city.

4 . 6 . 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 increase in traffic on adjacent and local roadways and intersections due to reuse of the site would be minimal, and Alternative 6 would only make up 14 percent of the total p.m. peak-hour traffic resulting from cumulative projects (Table 19). Therefore, traffic generated by Alternative 6 would have a minor cumulative effect on local and regional traffic growth and related congestion. The combined cumulative projects, including Alternative 6, would generate increased traffic volumes throughout the Presidio. The cumulative projects would create 300 additional vehicles on Lincoln Boulevard during p.m. peak hour, and Alternative 6 would make up about 6 percent of the additional traffic.

The total additional parking demand due to the cumulative projects, including Alternative 6, would be 3,692 parking spaces. Alternative 6 would make up only 19 percent of this demand within the Presidio and 16 percent of the total cumulative parking demand within the project impact zone, a relatively small portion compared to other alternatives (Table 21). The GMPA's 8,390-space parking supply would accommodate cumulative demand within the park. Parking impacts outside the Presidio are described in Alternative 2.

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

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

Since this alternative would not involve the removal of nonhistoric structures, new compatible construction, or the preservation of the cultural landscape, this alternative would not contribute to efforts to protect cultural resources within their historic settings. Under this alternative, there would be minimal likelihood of encountering archeological resources, because limited ground-disturbing activities would occur.

4 . 6 . 1 1 . 7 A I R Q U A L I T Y

This alternative would contribute to a cumulative increase in vehicle trips on the region's roadways and therefore cumulative increases in regional emissions. The cumulative operational emissions would cause



localized impacts at congested intersections in the vicinity of the projects, but the resulting impacts would not be expected to cause local violations of ambient air quality standards. Anticipated cumulative increases in vehicle trips would also result in increases to region-wide emissions of ozone precursors (including NO_x and ROGs) and CO. The proposed development would cause emissions of ozone precursors that fall below the thresholds set forth in federal regulations for conformity determinations (as shown in Table 22). Emissions of CO that would be caused by the cumulative scenario under Alternative 6 are accounted for in the current maintenance plan for CO, as discussed in Section 5.4.2. Because this alternative would be in conformance with regional air quality plans, no further conformity analysis is necessary, and no significant cumulative impacts would occur.

4 . 6 . 1 1 . 8 N O I S E

Construction activities associated with repairs to infrastructure, building rehabilitation, limited transportation improvements, and reconstruction of Doyle Drive would cause short-term cumulative noise impacts. Long-term cumulative noise impacts around the Letterman Complex would primarily result from increased traffic on Doyle Drive (U.S. Highway 101), and other roads internal and external to the Presidio. None of the roadway segments near noise-sensitive receptors would experience greater than two-fold peak-hour traffic increases. Therefore, no significant cumulative noise impacts are expected.

4.6.12 Unavoidable Adverse Effects

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

Cultural Resources – The following would have a potential adverse effect on cultural resources:

- The presence of the LAMC tower would continue to have an adverse effect on the viewsheds from the Presidio to the 23-acre site, resulting in an adverse visual impact.

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

This alternative would not be a sustainable action that could continue over the long term without environmental problems. Alternative 6 would not meet the needs of the present in such areas as infrastructure improvements, interpretation, visitor management and revenue generation, and it could also compromise the ability of future generations to meet their needs. Mothballing of the LAMC, however, would not foreclose options for future preservation and use.



4.6.14 Irreversible or Irrecoverable Commitments of Resources

This alternative would result in generally fewer commitments of resources than the other alternatives since no new development would occur. However, Alternative 6 would not explore recycling or conservation to the degree that would be implemented in the other alternatives.

