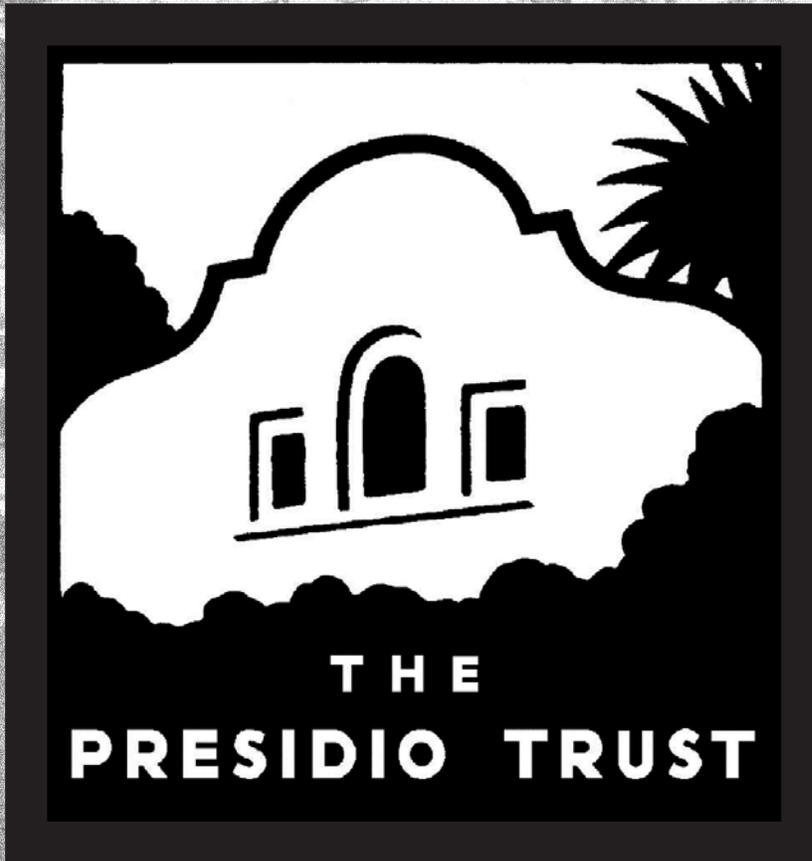


**FINAL
ENVIRONMENTAL IMPACT
STATEMENT
AND
PLANNING GUIDELINES**



**THE
PRESIDIO TRUST**

FOR NEW DEVELOPMENT AND USES ON 23 ACRES WITHIN

THE LETTERMAN COMPLEX

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

**PRESIDIO OF SAN FRANCISCO
MARCH 2000**



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

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

Presidio of San Francisco, San Francisco, California

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

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

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

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



Introduction

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

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

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

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



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

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

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

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



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

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

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

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



Underlying Purpose and Need

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

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

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

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

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



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

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

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

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

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



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

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

G O A L S

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

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



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

Alternatives

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

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

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



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

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

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

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

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

ALTERNATIVE 2: SUSTAINABLE URBAN VILLAGE

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



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

ALTERNATIVE 3: MIXED-USE DEVELOPMENT

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

ALTERNATIVE 4: LIVE/WORK VILLAGE

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

ALTERNATIVE 5: DIGITAL ARTS CENTER (PREFERRED ALTERNATIVE)

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

ALTERNATIVE 6: MINIMUM MANAGEMENT (NO ACTION)

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



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

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

Major Conclusions

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

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

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

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



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

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

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

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

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

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



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

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

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

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

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



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

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

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

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

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



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

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

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

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

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

Air Quality – Feasible control measures would be employed to minimize particulate matter (PM₁₀) emissions during construction. Vehicle trips associated with Alternatives 1 and 4 would result in regional operational emissions exceeding the Bay Area Air Quality Management District's significance thresholds for nitrogen oxides. Implementation of Transportation Demand Management measures would encourage alternatives to automobile use, and thus would contribute to improvements in air quality and lower nitrogen oxide emissions, but not to a level of insignificance. None of the alternatives would result in local operational air quality impacts exceeding the state ambient air quality standards for carbon monoxide.

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



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

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

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

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

Major Issues Raised by Agencies and the Public

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



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

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

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

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



Issues to be Resolved

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

THE NHPA REQUIREMENT

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

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

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

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



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

DESIGN REVIEW AND FUTURE PUBLIC INVOLVEMENT

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

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

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



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E	Financial Management Program
F	Letterman Complex Programmatic Agreement
G	Additional Information on Past, Present, and Reasonably Foreseeable Future Actions
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List of Acronyms

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



T A B L E O F C O N T E N T S

gpm	gallons per minute
GSA	General Services Administration
gsf	gross square feet
HASR	Historic Architectural Survey
HC	hydrocarbons
HCM	Highway Capacity Manual
ITS	Intelligent Transportation Systems
LAIR	Letterman Army Institute of Research
LAMC	Letterman Army Medical Center
LDA	Letterman Digital Arts Ltd.
LEED	Leadership in Environmentally Efficient Design
L _{dn}	24-hour average noise
L _{eq}	equivalent energy indicator
LOS	Level of Service
MEI	Maximally Exposed Individual
mgd	million gallons per day
ml	millimeter
MLPs	Maximum Load Points
MTC	Metropolitan Transportation Commission
MUNI	San Francisco Municipal Railway
n.d.	no date
NAGPRA	Native American Graves Protection and Repatriation Act
NAPP	Neighborhood Associations for Presidio Planning
NEPA	National Environmental Policy Act
NHL	National Historic Landmark
NHPA	National Historic Preservation Act
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NRC	Nuclear Regulatory Commission
NRHP	National Register of Historic Places
P.L.	Public Law
PA	Programmatic Agreement
PHSH	Public Health Services Hospital
PM ₁₀	particulate matter
PM _{2.5}	fine particulate matter
ppm	parts per million by volume
PSR	project study report
RCRA	Resource Conservation and Recovery Act
RFP	Request for Proposals
RFQ	Request for Qualifications
ROG	Reactive Organic Gases
RWQCB	Regional Water Quality Control Board
SamTrans	San Mateo Transit
SDC	Service District Charge
SFCTA	San Francisco County Transportation Authority
SFDPT	San Francisco Department of Parking and Traffic
SFFO	San Francisco Field Office
SFUSD	San Francisco Unified School District
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan



T A B L E O F C O N T E N T S

SO ₂	sulfur dioxide
SPUR	San Francisco Planning and Urban Research Association
SWPPP	Storm Water Pollution Prevention Plan
TDM	Transportation Demand Management
UCSF	University of California at San Francisco
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
USPP	U.S. Park Police
VMP	Vegetation Management Plan
µg/m ³	micrograms per cubic meter

