

Letter 1

JUD CONSULTANTS

TRANSPORTATION PLANNERS FILE

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1 May 1999

BY FAX,
Hardcopy will follow from Interland



Presidio Trust
NEPA Compliance Coordinator
34 Graham Street
P.O. Box 29052
San Francisco, California 94129

Re: DEIS Traffic Analysis for Presidio Village

To Whom It May Concern,

This letter is to comment on the Traffic and Transportation section of the DEIS for the Letterman Complex, especially as it relates to Presidio Village (Alternative 4). As discussed herein, I believe that the DEIS relies on erroneous assumptions to reach incorrect conclusions, as follows:

1. The DEIS improperly applied the ITE land use definitions by characterizing the multi-media activities at Presidio Village as a "General Office Building" rather than as a "Research and Development Complex."
2. The DEIS improperly used residential trip generation rates for single-family homes and family apartments rather than for one-bedroom and studio apartments.
3. The DEIS omitted several TDM measures from the Presidio Village project description.
4. The projected modal splits for Presidio Village failed to utilize available information regarding CNET employee travel patterns.



TRIP GENERATION

1. The DEIS applied the incorrect ITE land use category to the multi-media activities at Presidio Village.

In Table D-1 of the DEIS, the multi-media activities at Presidio Village are characterized as "office" (ITE Land Use category 710). By comparison, the multi-media activities of the LNR proposal (Alternative 2) and the Lucas proposal (Alternative 5) are characterized as "University/R&D" (ITE Land Use category 760).

There is no supportable basis for distinguishing between the multi-media activities of Presidio Village and the multi-media activities of Alternatives 2 and 5. In *Institute of Transportation Engineers Trip Generation (5th Edition)*, ITE defines a "Research and Development Center (Land Use 760)" as "facilities or groups of facilities devoted nearly exclusively to research and development activities. They may also contain offices and light fabrication areas." All three alternatives clearly meet this definition. Alternative 2 is described as a "village campus for health care, education, offices, residential uses, and an inn," (page 21), and Presidio Village is similarly described as a "village of offices, institutions, housing, and support services" (page 31). Like the various Lucas companies, CNET is "engaged in research, development and production of digital arts and technologies" (see page 31). Indeed, page 27 of the DEIS notes that CNET is "devoted to Internet media, communications, and education." More generally, both entities are involved in inventive, educational, and commercial activities that are both technology-driven and design-related. Both have worker densities of 330 square feet per employee.

1-1

By comparison, the definition of General Office Building (Land Use 710) is distinctly different from the Presidio Village concept: "A general office building ... or buildings may contain a mixture of tenants including professional services, insurance companies, insurance brokers, and tenant services such as a bank or savings and loan, a restaurant or cafeteria, and service retail facilities. Nearly all of the buildings surveyed were in suburban locations." None of these examples address the multimedia R & D activities anticipated at Presidio Village, which is clearly an urban, not suburban development.

The application of the incorrect ITE land use category to Presidio Village artificially inflated project person-trip rates for those multi-media activities by more than 58%. While the DEIS applied a person-trip rate of 11.42 trips per 1,000 square feet for Alternatives 2 and 5, it improperly applied a person-trip rate of 18.1 trips per 1,000 square feet to Alternative 4. We recommend that Table D-1 be amended to accurately characterize the multi-media activities of Alternative 4 as "R&D" rather than as "Office."



2. The DEIS improperly used trip generation rates for single-family homes and family apartment rather than studios and one-bedroom apartments.

As noted in Table D-1, footnote 4, the DEIS assumed that all housing units at Presidio Village will be either single-family homes or 2+ bedroom multi-unit apartments with a person-trip rate of 10.0 trips per unit. This assumption is incorrect. 75% of the housing units at Presidio Village will be one-bedroom and studio apartments with a trip generation rate of only 7.5 trips per unit; only 25% of the units will be 2 or 2+ bedroom units. The weighted average for Presidio Village is 8.12 trips/unit, as follows:

$$(75\% \times 7.5 \text{ trips}) + (25\% \times 10.0 \text{ trips}) = 8.12 \text{ trips}$$

Based upon the comments above, we calculate daily person trip generation for Presidio Village as follows:

R&D:	475,000 sf x 11.42 trips per thousand sf	= 5,424
Housing:	459 units x 8.12 trips per unit	= 3,727
<hr/>		
Total		= 9,151

According to page D-2 of the DEIS, approximately 15% of these trips are assumed to be internal and 85% external. However, we believe that a much more realistic trip distribution for a large live/work project of this size would be 25% internal trips and 75% external trips, particularly where, as here, 25% of CNET's employees have indicated their desire to live within Presidio Village. Actual external person trips for Presidio Village, then, is calculated to be 6,863 trips (9,151 trips x 0.75). We suggest that Table D-2 and other sections of the DEIS be edited accordingly.

3. The DEIS transportation report incorrectly omitted several TDM measures from the Presidio Village project description.

Section 4.4.7.6 (Impacts of TDM Measures) incorrectly states that Presidio Village will include just 10 TDM measures in addition to the 9 TDM measures listed on page D-4. The Presidio Village proposal actually incorporates 37 of the 38 possible TDM measures listed in Table 2.2. of the DEIS transportation report. These measures go beyond the ones suggested in *Transportation Management Programs in Greater Downtown* of the San Francisco Department of City Planning. We suggest that Section 4.4.7.6 be replaced with the following text:

“Alternative 4 incorporates 37 of the 38 possible TDM measures identified by the Presidio Trust to encourage non-automobile use and minimize parking demand. In addition to the TDM plan elements described under Alternative 1, the following TDM measures were developed as part of Alternative 4:



1-2

1-3

- *Allocation of a portion of the site for workforce housing*
- *A project shuttle van to BART, MUNI, the ferry, downtown, and the Main Post*
- *Providing monetary incentives to not drive*
- *Guaranteed ride-home program*
- *Midday transit pass availability*
- *Car-sharing*
- *Bicycle-sharing*
- *Pedestrian and bicyclist amenities such as onsite showers and changing rooms*
- *Class II bicycle lanes*
- *Preferential carpool/vanpool parking*
- *Time limits for short-term parking supply*
- *Flex-time policies*
- *Telecommuting policies*
- *Web page*
- *TMA membership*
- *Brokerage of services*
- *Rideshare incentives*
- *Carpool/vanpool matching*
- *Vanpool program*
- *Promote transportation fairs*
- *New employee orientation*
- *On-site amenities and support services*
- *Bicycle and pedestrian routes connected*

1-3

These TDM measures would support transit use and discourage single-occupant auto use by employees by providing incentives for carpooling and not driving (e.g. preferential carpool and vanpool parking, constraining parking supply, guaranteed-ride-home program, and providing monetary incentives). The project shuttle van to the Main Post, BART, MUNI, the ferry, and downtown San Francisco would encourage transit use and reduce the number of cars to the Presidio without being dependent upon the creation of a Presidio-wide shuttle system. Bicycle and pedestrian travel would be encouraged through the provision of on-site pedestrian and bicycle facilities (including Class II bicycle lanes, sidewalks, and on-site showers and lockers), midday transit passes, and bicycle sharing. Flextime, telecommuting, and guaranteed-ride-home programs would allow employees to adjust their work schedules as necessary. The car-sharing program would provide employees and residents the flexibility of using transit, bicycling, or walking, while having a vehicle available when needed. The inclusion of housing within walking distance of the job site and on-site amenities like ATMs, restaurants and retail facilities would further reduce the number of vehicle trips to the site and parking demand."



MODAL SPLIT

- 4. The projected modal split for Presidio Village failed to utilize available information about CNET employee travel patterns and instead erroneously relied on generalized projections in the GMPA EIS.

The DEIS utilized modal split information from the GMPA EIS and assumed that 70% of Presidio Village person trips will be by auto (see page D-3). While this modal split may be appropriate for residential uses, this generalized assumption is not appropriate for the R&D uses in light of the information presently available regarding CNET's current employee travel patterns.

A survey of CNET employees indicates that no more than 25% of CNET's employees presently drive to work; 75% walk, bicycle, or take the bus to work. Moreover, 75% of CNET's workers presently live in San Francisco.

Work trips normally constitute 40% of daily travel, while other trips make up the remaining 60% of daily travel. Assuming that 25% of Presidio Village work trips and 70% of other trips are done by car, we conclude that 52% of all trips will be by car. This is based on the following calculation of the weighted average:

$$(25\% \times 0.4) + (70\% \times 0.6) = 52\%$$

Based on these factors, and the factor 0.75 of paragraph 2 for external trips, we suggest Table D-2 "External Trip Generation" be edited as follows, and other sections of the DEIS accordingly:

Alternative	Person-Trips			Total	Vehicle Trips
	Auto	Transit	Walk/Bicycle		
Alternative 4	4,060	1,400	1,400	6,860	2,900

It should be noted that these numbers are rounded.

Thank you for your consideration of these comments. If you have any questions or would like more information, please do not hesitate to contact me personally.

Sincerely yours,
EUGENE JUD, FITE



CC: Dick Tilles, Wilbur Smith Ass.
Shorenstein, Interland



Responses to Comments in Letter 1

1 - 1

Thank you for your comments. The primary tenant, an Internet information network company which is proposed as part of Alternative 4, would account for 200,000 of the 525,000 gross square feet (gsf) dedicated to office uses. If the Research and Development trip generation rates were used for the Internet company component, the daily external vehicle trips generated by Alternative 4 would be reduced by 570 daily vehicle trips, or 10 percent of the 5,710 trips noted in the Draft EIS. As suggested by the commentor, the text and tables of the Final EIS have been amended to more accurately reflect the multi-media activities of Alternative 4. As a result of this amendment, the total traffic that would be generated by Alternative 4 was reduced from 6,450 to 5,810 daily vehicle trips, and from 760 to 710 p.m. peak-hour vehicle trips (see Table 16). In addition, the projected parking demand for Alternative 4 was reduced from 1,200 to 1,160 parking spaces. Although the revised trip generation rates would generate less p.m. peak-hour traffic at the study intersections, no levels of service were changed, and no significant impacts were eliminated.

1 - 2

Specific data on the number of studio, one-bedroom and two-bedroom units were not provided by the development teams, and therefore as a conservative assumption, the residential trip generation rate for 2-plus bedrooms/single-family homes was applied to Alternatives 2 and 4. The average size of the dwelling unit was reviewed to determine the applicability of the two-bedroom rate. For example, under Alternative 4, the average size per dwelling units is 822 to 975 feet (400 to 450 dwellings units with a total of 370,000 square feet), which in San Francisco is typically a two-bedroom unit.

1 - 3

The EIS preparers reviewed the TDM program presented in the proposal for all alternatives. In response to the comment, Sections 4.2.7.6 and 4.4.7.6 of the EIS were amended to include the revised listing.

1 - 4

The Draft EIS used an analysis primarily based on proposed uses rather than specific tenant characteristics for a number of reasons:

- To account for alternatives where subtenants were not specified.
- To allow for subtenant substitutions, within the same general land use category, that could occur prior to the 2010 analysis year.
- To account for the fact that even where specific subtenants were identified, current employee transportation mode and residence data were not usually made available to our analysts.
- To recognize that transportation characteristics are not necessarily tied to a specific tenant but to the current and future transportation characteristics of the Presidio itself.

For all the above reasons, but particularly the last, CNET's current modal characteristics were not used. CNET's current office is located in a densely developed section of Telegraph Hill where parking is extremely limited and use of non-automobile modes is essential. While the Presidio Trust will institute a Transportation

L E T T E R 1

Demand Management program that would reduce the proportion of automobile trips to the park, it would be unrealistic to base the Draft EIS traffic analysis on the 25 percent automobile mode share that CNET is reported to achieve at its current location.



Letter 2



3 May 1999

NEPA Compliance Coordinator
Attn. Letterman Complex
Presidio Trust
34 Graham Street
P.P. Box 29052
San Francisco, California 94129

Via UPS Next-Day

Re: Comments on Letterman DEIS

Dear Coordinator,

By this letter we herewith transmit the comments of the Shorenstein/ Interland team regarding Section 4.4 of the Draft Environmental Impact Statement (DEIS) for the Letterman Complex. Our comments on other sections of the DEIS will be submitted under separate cover.

4.4.1 CONSISTENCY WITH APPROVED PLANS

4.4.1.2 Presidio General Management Plan Amendment

Comment: The DEIS fails to note how the Presidio Visitors' Center, the Women's Technology Center, the San Francisco Historical Society, and the California Indian Museum and Cultural Center will support the GMPA goals. A detailed letter reviewing how each Presidio Village tenant fulfills the goals and objectives of the Trust is attached hereto. We suggest that the text of 4.4.1 be edited as follows (inserted text indicated in italics):

"Alternative 4's anchor tenant, a media/Internet programming company, *and the women's small business hi-tech* would be consistent with the GMPA's general objective to provide for appropriate uses of the Presidio, particularly those that involve the arts, education, research, innovation, and communication. *These uses* would complement park-related programs and activities in the areas of Internet-based research and

2-1



NEPA Compliance Coordinator
The Presidio Trust

May 3, 1999

development and telecommunications. In addition, *the women's small business hi-tech incubator would contribute towards the Trust's goals by promoting socio-economic diversity.*"

"The visitors' center, the international environmental organization, the national foundation supporting national parks, and the museum and cultural center would also be consistent with the GMPA's general objective to provide for appropriate uses of the Presidio, particularly those that involve stewardship and sustainability, community service and restoration, research, education, and communication. They would also advance the GMPA's specific objective to provide research, education and training in the principles and practices of resource stewardship within and beyond park boundaries. In addition, the international environmental organization and the museum and cultural center would contribute to cross-cultural and international cooperation."

2-1

"The branch library of the California state library system and the local historical society would similarly be consistent with the GMPA's general objective to provide for appropriate uses of the Presidio, particularly uses that involve education, research, communication, and stewardship of resources. They would also promote the GMPA's Presidio-wide principles regarding interpretation and education, as well as collection preservation."

4.4.2 SOLID WASTE

4.4.2.1 Disposal of Demolition Debris: The DEIS assumes that all demolition materials will be disposed of off-site and that no on-site or off-site recycling will occur. The DEIS states that Presidio Village will generate 80,000 tons of concrete debris.

Comment: These assumptions are incorrect. According to Joe Urrutia of Swinerton & Walberg, general contractors for Presidio Village, approximately 75% of concrete debris will be crushed and recycled on-site for parking areas and roadways. We suggest that the text of 4.4.2.1 be edited as follows:

2-2

"Alternative 4 would generate 80,000 tons of construction debris. The project contractor estimates that approximately 75% of this debris (60,000 tons) will be crushed and recycled on-site for parking areas and roadways. Approximately 20,000 tons of debris would remain for removal off-site."



NEPA Compliance Coordinator
The Presidio Trust

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4.4.4 SCHOOLS

4.4.4.1 *Impact on Capacity of Existing or New School Sites:* The DEIS assumes that the average household site at Presidio Village will be 3.2 persons per household (Table 12), and that Presidio Village will therefore generate 273 school children.

Comment: Only 25% of the residential units at Presidio Village will be two-bedroom units or larger capable of accommodating 3.2 residents; 75% of the residential units will be studios and one-bedroom units that cannot accommodate 3.2 person. We therefore suggest that the residential population of Presidio Village be recalculated based on the actual unit mix to reflect the significantly lower demand for school facilities that could be generated.

2-3

4.4.5 HOUSING

4.4.5.1 *Increase in Housing Demand:* The DEIS states that Presidio Village includes "400 to 450 units to be constructed on site."

Comment: Presidio Village will provide 459 units of workforce housing. We suggest that the text be amended accordingly.

2-4

4.4.6 MEDICAL RESEARCH

4.4.6.1 *Impact on Medical Research:* The DEIS states that "implementation of [Presidio Village] would preclude the use of the site for medical, life science and/or earth science research."

Comment: The DEIS defines the Updated Presidio GMPA Alternative for a Science and Education Center as follows: "The Letterman Complex would continue to be used to nurture ideas and support research and actions to improve human *and environmental health*. Life and earth science programs would be explored to better understand and manage the interdependence of health and the environment" (DEIS page 18, Sect. 2.1.1, emphasis added).

2-5

Presidio Village includes numerous tenants dedicated to environmental health and earth sciences. We suggest that 4.4.6.1 be replaced with the following text and the remainder of this section edited accordingly:



NEPA Compliance Coordinator
The Presidio Trust

May 3, 1999

“Many Presidio Village tenants are involved in research and actions to improve environmental health and explore earth sciences, including Conservation International, the National Park Foundation, and the Indian Museum and Cultural Center. Through programs encouraging public participation, as well as lectures, displays and interactive exhibits, visitors would learn about the scientific research that is underway and its contribution to society. Thus, the alternative would have a positive impact on medical, life science and/or earth research by provided needed research and education space.”

2-5

4.4.7 TRAFFIC AND TRANSPORTATION SYSTEMS

Comment: Comments on the traffic and transportation systems analysis for Presidio Village will be provided under separate cover to The Trust from Eugene Jud, FITE. Dr. Jud’s report will detail the following:

- The DEIS improperly applied the ITE land use definitions by characterizing the multi-media activities at Presidio Village as “General Office Building” rather than as a “Research and Development Complex.”
- Although 75% of the housing units at Presidio Village will be studios and one-bedroom apartments, the DEIS improperly used residential trip generation rates for single-family homes and large family apartments.
- THE DEIS omitted several TDM measures from the Presidio Village project description.
- The projected modal splits for Presidio Village failed to utilize available information regarding CNET’s employee travel patterns.

2-6

4.4.9 AIR QUALITY

4.4.9.1 Short-Term Demolition/Construction Impacts: The DEIS analysis of construction-related air quality effects is based upon the assumptions that (1) all demolition debris will be disposed of off-site and that no recycling will occur, and (2) the project will contain 525,000 square feet of office space.

2-7

Comment: As noted above, these assumptions are incorrect. We suggest that 4.4.9.1 be replaced as follows, the level of air emissions recalculated, and the remainder of this section edited accordingly:



NEPA Compliance Coordinator
The Presidio Trust

May 3, 1999

"Alternative 4 would generate 80,000 tons of construction debris. The project contractor estimates that approximately 75% of this debris (60,000 tons) will be crushed and recycled on-site for parking areas and roadways. Approximately 20,000 tons of debris would remain for removal off-site."

2-7

4.4.9.2 Long-Term Regional Operation Impacts: The DEIS states that Presidio Village would generate 99 lb./day of NOx.

Comment: In calculating air emissions, the DEIS erroneously omits the TDM measures that are integral to the Presidio Village proposal, thereby utilizing a legally faulty project description. Moreover, the DEIS analysis is based upon traffic assumptions which do not take into account actual CNET traffic patterns or the operation of a free Presidio Village shuttle van. We suggest 4.4.9.2 be edited to address air emissions from Presidio Village including the TDM measures, and taking into account the comments submitted separately by Dr. Jud regarding trip generation and modal splits.

2-8

4.4.11 UNAVOIDABLE ADVERSE EFFECTS

Air Quality: The DEIS states that "NOx emissions would be significant based on the BAAQMD's significance thresholds for NOx of 80 pounds/day."

2-9

Comment: This section may need to be amended to reflect changes to 4.4.9 above.

Thank you for your consideration of these comments. If you have any questions or would like more information, please feel free to contact either of us.

SHORENSTEIN, LP

INTERLAND CORPORATION


Thomas W. Hart
Vice President


Richard C. Reisman, AIA
Vice President



Responses to Comments in Letter 2

2 - 1

Thank you for your letter. The text has been modified to address how the various tenants of Alternative 4 that were not previously identified in Section 4.4.1.2 would be consistent with the General Objectives of the GMPA.

2 - 2

As indicated in Section 4.1.2 of the Draft EIS and Final EIS, for purposes of the impact assessment only, the assumptions reflected a worst-case (largest quantity) analysis. However, it is understood that much of the concrete would be crushed and recycled onsite to divert as much material from the waste stream as technically and financially possible. Mitigation measure SW-1, *Waste Reduction Goals* would require that the project divert at least 50 percent of the waste stream due to demolition within the Letterman Complex. In addition to concrete, these materials would include wood, brick, ceramic tile, gypsum, paper, glass, plastics, asphalt, various roofing materials, and mixed waste.

2 - 3

The schools analysis contained in the Draft and Final EIS is based on the same set of assumptions for all alternatives to avoid underestimating the worst impacts on public schools. The estimates reflect the number of schoolchildren currently living in Presidio housing, the best information available at this time, and are provided for comparative purposes only.

2 - 4

The housing analysis for Alternative 4 represents the impacts that would occur under the Presidio Village concept. The text has not been amended as recommended by the commentor.

2 - 5

The medical research analysis in the Draft and Final EIS evaluates the impact of each alternative on medical and life science research in the Bay Area. The text in Section 4.4.6 has been revised to delete the reference to earth science research. The contribution of these tenants to the Presidio are more appropriately described in Section 4.4.1 (Consistency with Approved Plans and Policies) within the Draft and Final EIS.

2 - 6

Please refer to responses to comments 1-1 through 1-4.

2 - 7

The analysis is based on a worst-case assumption to ensure that impacts are not underestimated. Please refer to response to comment 2-2.

2 - 8

For TDM and mode split see master response 19. With regard to the comment regarding trip generation rates and modal splits assumed for Alternative 4, see the responses to comments 1-1 and 1-4.

2 - 9

No amendment is needed because the revised NO_x emissions (90 pounds/day) would still be significant.



Letter 3

May 15, 1999

HAND DELIVER/FAX

**COW HOLLOW NEIGHBORS IN ACTION
MARINA - COW HOLLOW NEIGHBORS AND MERCHANTS
2742 BAKER STREET
SAN FRANCISCO , CALIFORNIA 94123
415 -776-3191 FAX 415 -776 - 6522**

**PRESIDIO TRUST
34 GRAHAM STREET
SAN , FRANCISCO, CALIFORNIA**

RE : Letterman Proposals

Our organization is a group of neighbors and merchants that have the most at stake to lose with the development of these proposals. We are going to explain to you why and how the Lucas Letterman Digital should be selected as it pertains to the goals of the Golden Gate National Recreation Act , the Presidio Trust Act, and how our decision applies to the Draft Environmental Statement and Planning Guidelines.

1. The proposals must enhance the Presidio of San Francisco as a National Park.

A. Open Space - "Respect and Respond to unique characteristics of Each site" & " Integrate public access with private Development."

Existing site : 2 buildings - approx. 13 acres of open space

Lucas Letterman Digital more open space that will be approximately 113 Acres easily accessible to the public.

Shorenstein has only approximately 6 acres (mostly pavement) of open space for the public. The rest that is counted consists of sidewalks, and open space for the tenants NOT for the public.

3-1



B. Parking and Traffic

Lucas - 1500 vehicles less the Shorenstein on weekdays

Lucas - 2400 vehicles less than Shorenstein on weekends .

**Traffic Patterns for Lucas is a deduction in volumes and the noise
Ambiance would be less than alt 1 and the noise levels will be lower.**

**Traffic Patterns for Shorenstein will be approx. 16% higher that the
Existing plan for Alt 1 , The noise levels would remain the same.**

Weekday External Trips Lucas = 8740 Shorenstein = 11,410

P. M. Trips Lucas = 810 Shorenstein = 1,330

Weekend Internal trips Lucas = 140 Shorenstein = 320

3-2

**Weekend trips - Shorenstein will generate trips from the residents
And the commercial spaces more of a mall environment.**

**Lucas will generate only a skeleton crew for their workers.
More National Park Environment.**** - will encourage
Their workers and other park visitors to utilize the
Adjacent commercial district. Per"Enhance linkages with
The rest of the Presidio and possible with the City."**

**Parking Demand : Draft Eir failed to address the lack of parking of the
Housing element of the Shorenstein proposal. Current standards on
The outside neighborhood parking demand is two parking places for
Studios and a minimum of two parking places for one bedrooms.
Daytime parking weekday parking will be as follows*** :**

3-3

Lucas would require an adjustment of 270 spaces.

**Shorenstein would require an adjustment of 190 plus a minimum of
250 = an adjustment of 440 parking places.**

***** CNET - starting jobs usually are a minimum of \$50,000 a year.**

The workers who will be living on the premises will own vehicles.



5-15-1999 CHNIA To Presidio Trust / GGNRA Advisory Commission.

Lucas has agreed to address and mitigate their parking deficiencies with the Neighbors .
Shorenstein has REFUSED to work with the neighbors concerning Parking deficiencies.

3-3

Emmission :

Reactive Organic Gases :	Lucas 47.3	Shorenstein 59.2
Nitrogen oxides	: Lucas 74.1	Shorenstein 99.4*
Particulate Matter	: Lucas 31.9	Shorenstein 42.9
Carbon Monoxide	: Lucas 556.4	Shorenstein 742.8**

3-4

*** Exceeds BAAQMD threshold criteria.**

**** Exceeds BAAQMD threshold and must be factored in with the Cumulative effects of the regional area of Highway 101 .**

WE shall address the EIR in our report to the Presidio Trust by June 26, 1999.

PLEASE VOTE FOR LUCAS - over 90% of the neighbors have voted for Lucas.



**Lombard - Chestnut - Union Street Traffic interim traffic study
as of 5-1-1999 by Marina - Cow Hollow Neighbors and Merchants.**

700 businesses average number of workers + 4 = 2800 workers

5 customers a day drive to businesses = 3500 = 700 places

8011 restaurant & bar seats = @ number of workers 1281

**1/3 customers drive to restaurant = 2670 parking places
needed.**

**Total number of workers = 4081 (1/3 drive to work = 1360 parking
places needed for workers.**

**Current minimum number of parking places needed = 4730 parking
places.**

Lombard from Lyon to Webster there are 280 meters

Pierce Street Parking lot 189 meters

Lombard Street 240 places

Union street Meters 320 meters

Total Parking places = 1029

Average parking places from Webster to Van Ness = 120

Side Streets Average parking places = 54

Total number of parking places in existence + 1203

At this moment we are at a loss of 3500 parking places.

3-5



3. 1998 Regional Mass Transportation Study

A. Golden Gate Corridor

1. Average Daily Trips are projected to increase by 46% by 2020 Since 1990.
2. Transit Trips are projected to increase 37% by 2020 since 1990.
3. 1990 average vehicles an hour a day 9115.
Estimated daily vehicles projected by 249% increase by 2020.

B. Vehicles traveling West.

1. Cal Trans study peak hours 9=1998 3476 vehicles 5- 6 P.M.
99.8% per Mr. Sartipi of Cal Trans.
2. S.F. Department of Parking and Traffic 3495 vehicles between 5 & 6 P.M. -
95.9 % figures acquired from Tom Folkes.
3. Chnia - 3493 vehicles between the hour of 5 & 6 P.M. - 95.7%
(1298 - 199)

3-6

This is an average of 97.13% of maximum capacity.



Responses to Comments in Letter 3

3 - 1

Thank you for your letter. The organization's preference for Alternative 5 (the Digital Arts Center) based on its review of the GMPA and the Draft EIS is noted for the record.

3 - 2

The organization's comments in support of the Digital Arts Center are noted for the record.

3 - 3

Comment noted. Refer to master response 20 regarding neighborhood parking.

3 - 4

The numbers cited in the text are cited in Table 22 of the Final EIS. As discussed in the text under Section 4.1.9, Air Quality, localized carbon dioxide emissions are based on future worst-case traffic volumes and meteorological conditions at the most heavily impacted intersection along U.S. Highway 101. Therefore, the air quality analysis takes into account the incremental impact of Alternative 5 on cumulative conditions within the region.

3 - 5

The commentor's calculations are noted for the record. Please see master response 20. The Presidio Trust, through implementation of mitigation measure TR-4, *Monitoring of Parking*, would ensure that the project does not contribute to parking deficiencies in the Lombard Street corridor.

3 - 6

The EIS preparers have reviewed the cited study. Page 30 of the study indicates, as stated, a 46 percent increase in corridor person trips and 37 percent increase in transit trips in the "Golden Gate Corridor." This corridor includes all of Marin and Sonoma counties and states that the bulk of traffic increases would occur in those counties. In fact, the report states that "shorter distance, intra-corridor travel is the fastest growing travel market." Therefore, even though the Metropolitan Transportation Commission (MTC) predicts a significant overall growth, most would not occur in the area of the Presidio and Doyle Drive. Furthermore, the vehicle capacity on the Golden Gate Bridge, Marina Boulevard and Lombard Street effectively constrain traffic on Doyle Drive so that significant traffic increases on Doyle Drive cannot occur.

Letter 4



NEIGHBORHOOD ASSOCIATIONS FOR PRESIDIO PLANNING

234 32nd Avenue, San Francisco, California 94121 Tel 415-636-1446 Fax 415-636-1237

Cow Hollow Association, Inc.

Presidio Heights Association of Neighbors

Planning Association for the Richmond

West Presidio Neighborhood Association

Marina Civic Improvement and Property Owners Association

Pacific Heights Residents Association

Lincoln Park Neighborhood Association, Inc.

Sea Cliff Properties #1

Presidio Terrace Association

Lake Street Residents Association

May 17, 1999

Presidio Trust Board of Directors
P.O. Box 29052
San Francisco, CA 94129-0052

Ladies and Gentlemen:

We applaud the open selection process with which you have conducted the search for the best plans and uses at the Letterman site, and we appreciate the opportunities we have had to address you about our concerns and to make suggestions.

Given the subsequent information brought to light in the Draft Environmental Impact Statement and Planning Guidelines, Neighborhood Associations for Presidio Planning ("NAPP") would like to make three additional comments:

- The overall project density appears to be too high for the twenty-three acre site upon which the plans are based; we recommend redistributing a portion of the 900,000 square feet of development to another area of the larger sixty-acre Letterman site. The selected designer(s) should work within the guidelines being developed by the Trust planning team, SMWM, as well as consider the historic placement of buildings and the planning guidelines described in Section B of the EIS. 4-1
- We remain concerned about the impact of traffic and parking on the adjacent neighborhoods and urge you to assure that plans for traffic abatement and parking standards be carefully reviewed and implemented in a timely fashion. 4-2
- The water element in the Walsh, Higgins design plan, which was not selected as one of the finalists, impressed us and we would like to see its concept incorporated into the selected plan if it is possible. We like the idea of making a physical connection to the Palace of Fine Arts site and believe that it strengthens the objective of maintaining a view corridor in that direction. 4-3

Thank you for your attention.

Sincerely,

William E. McDonnell, Jr.
William E. McDonnell, Jr.
Co-Chair, NAPP

cc: James Meadows
51932-1



Responses to Comments in Letter 4

4 - 1

As discussed in Section 1.2, Underlying Purpose and Need, the proposed project is needed to achieve the Presidio Trust Act's mandate that the Presidio Trust be financially self-sufficient by 2013, while managing the Presidio in accordance with the purposes of the Act establishing the GGNRA and the General Objectives of the GMPA. For a discussion of financial assumptions, see master responses 6A, 10A, and 10B. The Trust had rational reasons for proposing a project of 900,000 square feet of replacement construction on the 23-acre site. Please refer to the discussion there for a more detailed response. The Financial Management Program (Appendix E of the Final EIS) provides additional information on the financial assumptions underlying development at the Letterman Complex and elsewhere within the Presidio. The preferred alternative calls for the removal of LAMC and LAIR and other non-historic buildings (as described in the GMPA) with replacement construction of up to 900,000 square feet (LAMC and LAIR together total in excess of 800,000 square feet). Consistent with the GMPA land use concept for the Presidio, replacement of existing square footage in already developed areas would allow for the restoration of open space elsewhere, such as along the Tennessee Hollow corridor on the western edge of the Letterman Complex. The total square footage for the Letterman Complex would not exceed the existing 1.3 million square feet and the height of new buildings would be equal to or less than that of nearby structures with a maximum height of 60 feet. The density of new development on the 23-acre site would be more spread out than what currently exists, in order to adhere to the proposed height restrictions. This would achieve a more compatible, lower height design that would improve the visual integrity of the complex and minimize impacts on scenic viewing. New construction would be designed and sited to be consistent with the Presidio's National Historic Landmark status and adhere to the Planning Guidelines for the Letterman Complex (Appendix B). Please see Section 1.4 of the Final EIS.

4 - 2

The comment regarding review and implementation of traffic and parking plans is noted for the record. The Presidio Trust is working with Caltrans and the San Francisco Department of Parking and Traffic to ensure that all plans are reviewed and implemented prior to occupancy of the 23-acre site. The plans described in the EIS were prepared to ensure mitigation of all significant traffic and parking impacts resulting from implementation of the proposed project. Refer to master response 18 regarding access to the site and 20 regarding parking.

4 - 3

Comment noted. A sustainable water feature is included in the site plan for the preferred alternative. This feature is a lagoon at the northeast corner of the site which would be fed by captured stormwater. In addition, the preferred alternative incorporates an underground cistern for storing rainwater and re-collecting irrigation water that would be reused on the site. As discussed in the Planning Guidelines (Appendix B), visual and future pedestrian connections to the Palace of Fine Arts would be encouraged under all alternatives.

GOLDEN GATE NATIONAL RECREATION AREA
AND POINT REYES NATIONAL SEASHORE

ADVISORY COMMISSION

**MINUTES OF THE ADVISORY COMMISSION MEETING
MAY 18, 1999**

[A verbatim transcript of this meeting is available for public review in the Office of Communications and Partnerships, GGNRA, Building 201, Fort Mason, San Francisco, CA 94123. The following is a brief summary.]

Meeting time: 7:30 to 10.10 p.m.

Location: Building 201, Fort Mason, San Francisco, CA

Present for the Advisory Commission:

Chair Rich Bartke, Vice Chair Amy Meyer, Michael Alexander, Howard Cogswell, Naomi Gray, Redmond Kernan, Mel Lane, Trent Orr, Carlota del Portillo, Lennie Roberts, Merritt Robinson, Jack Spring, Hank Sciaroni and Jacqueline Young.

Staff Liaison: Michael Feinstein.

Present for the Golden Gate National Recreation Area:

General Superintendent Brian O'Neill, Presidio General Manager B.J.Griffin, Curator of Military History John Martini and Plant Ecologist Sharon Farrell.

Present for the Presidio Trust:

Executive Director Jim Meadows, Deputy Director Real Estate and Planning Jane Blackstone, Planning Manager Carey Feierabend, NEPA Compliance Manager John Pelka and Transportation Manager Dick Tilles.

Summary of Matters Discussed:

FORT BAKER'S BATTERY CAVALLO

John Martini, the park's curator for military history, briefed the Commissioners on the history of a hidden jewel called Battery Cavallo which over the course of time has become more and more historically significant. He illustrated his remarks with slides showing Civil War cannon that could fire 400-pound cannonballs four miles and the brick forts built to house them, that then became obsolete and were replaced with earthwork forts, of which Battery Cavallo is the best preserved example. Today it is being vandalized by mural artists, challenged by off-road travel, foot traffic and mountain bikes and overgrown with native vegetation.

Sharon Farrell, a plant ecologist, said this small pocket of land (nine acres) provides a unique refuge for a diversity of plant and animal life, supporting cliff-dwelling and scrub-nesting bird species, as well as live oak woodland, coastal coyote bush, California sagebrush and coastal perennial grassland habitat. She said there are more than 80 different native plant species in the area including over eight native bunch grasses and a diversity of wildflowers, such as paint brush, poppies, coast buckwheat and the Mission blue butterfly's host plant, the silver leaf lupine. There are also many invasive exotic plants including French broom. The park staff's plans are to maximize the cultural and natural resource values of Battery Cavallo.

Building 201, Fort Mason, San Francisco, CA 94123



BAY AREA RIDGE TRAIL: PRESIDIO ALIGNMENT

Carey Feierabend, Planning Manager for the Presidio Trust, said the Bay Area Ridge Trail, a 400-mile looped trail traversing the ridges surrounding the San Francisco Bay Area connecting the parks and open spaces, has been under design and development for some time. Focusing this evening on just the Presidio segment, she said the proposed alignment is the result of an extended analysis by NPS and Trust staff, landscape architects and Bay Area Ridge Trail staff. She introduced Clifford Janoff from the Bay Area Ridge Trail Council who said the Presidio alignment is the final piece of the ridge trail in San Francisco County, which will be the first county where the trail is complete.

Chairman Bartke asked Commissioner Kernan, chair of the Presidio Committee, what the thoughts of the committee were on the alignment. Commissioner Kernan presented a Resolution from the committee and moved its adoption by the full Commission. The motion was seconded and carried.

LETTERMAN DRAFT EIS

Jim Meadows said the draft environmental impact statement for the Letterman Complex was released on April 19, and the technical staff will be giving the detailed briefing on the six alternatives. Four of the alternatives parallel but are not exactly the same as the four finalists in the selection process. The first is the original GMPA alternative and the last is the no-action. By the end of May, the Trust Board of Directors is scheduled to announce a preferred alternative but the final selection will not occur until after the final EIS is actually published. He turned the mike over to Jane Blackstone to introduce the technical team.

Jane said the team consisted of herself, Carey Feierabend, John Pelka who is the NEPA Compliance Manager and Dick Tilles who is the Transportation Manager. The team gave a detailed presentation providing some context for the public comments later that evening. Jane reiterated the Trust's mission, the makeup of the Trust board, and that which guides the Trust, namely, the Presidio Trust Act and the general objectives of the GMPA. After a brief review of the project history of the Trust, she introduced Carey Feierabend.

Carey said the 900,000 square feet of construction within a 23-acre parcel within the 60-acre Letterman Complex is the Presidio's largest development opportunity and will help meet the Trust's objectives as laid out by Congress. The supplemental EIS, she said, focuses on those issues which were not fully analyzed in the 1994 document, or where conditions have changed. She walked the Commissioners through the six alternatives, then introduced John Pelka.

John said by summarizing the issues and incorporating mitigations from the GMPA EIS, they have been able to concentrate on those issues germane to the project at hand, thus reducing the 37 impact topics addressed in the GMPA EIS to 12 issues. Those issues are consistency with the GMPA, solid waste, impacts on: water supply, schools, housing, cultural resources, archeological resources, air quality, noise environment, scenic viewing, cumulative impacts and traffic and transportation. He highlighted the major conclusions within each of the impact topics, then introduced Dick Tilles.

Dick said they analyzed traffic in the year 2010 (as in the original GMPA analysis) and assumed the new development would take place prior to the reconstruction of Doyle Drive. Their three major tasks were to look at: the impact of new development relative to Alternative 1; the impacts of the various alternatives relative to each other, and the improvements required to handle traffic. The analysis was based on square footages of use (using SF guidelines), the number of internal and external trips, transit subsidies and bicycle amenities. The results show that Alternatives 2 through 5 have impacts very similar to Alternative 1 (original GMPA).

Chairman Bartke, after noting that the public hearing is on the environmental impact statement only, opened the public comment period.

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Public Comment:

Patricia Vaughey (Cow Hollow NIA) said their most concerned issue is the parking. There is none. Another concern is the emissions, particularly carbon monoxide, because the EIR does not address the cumulative effects as shown in the transportation study of August '98. She said both developers were asked if they would be willing to mitigate parking issues. Lucas said yes. Shorenstein has not answered them. 5-1

Karen Beastman (CA Indian Museum) said the Presidio is ancestral tribal land and every school child in the Bay Area in their fourth grade should come and learn about California Indians at their museum and help celebrate their culture and history and traditions. 5-2

Marianne Cavalier lives across the street from Letterman and people in her neighborhood of Richardson, Lyon and Francisco endorse the Lucas Digital proposal. The EIS does not address the problems caused by the weekend and evening traffic the Shorenstein proposal will create. Nor has it addressed tourist and special event buses. A proposed traffic light change at Francisco and Richardson would not allow her or her neighbors to access their garages. 5-3

Richard Reisman (Shorenstein-Interland) provided an 8-page document of additions since the March "Presidio Village" proposal detailing enhanced items for the visitor experience including a visitors center with information on public attractions. He said their professional will comment on traffic. Also, they have just printed a document about sustainability which their consultant will address later. 5-4

Margot Parke (NAP) thanked the Trust for the open process and the opportunity to ask questions of the four finalists. NAP still thinks the overall density is too high for the 23 acres and recommends redistributing a portion of the 900,000 to another area of the 60-acre Letterman site. They are also concerned about the impact of traffic and parking in the neighborhood. She submitted a letter to the Commission. 5-5

Chi-Hsen Shao (Shorenstein-Interland) disagreed with the EIS analysis on trip generation since the employment density for Shorenstein proposal is actually lower than the other proposal. The internal trips estimate did not consider the 25 percent of CNET employees who will live on site. Re the trip distribution patterns, CNET surveyed and found that 75 percent of its employees live in the city, which needs to be considered. So the EIS analysis needs to be revised to reflect lower vehicle trips and therefore lower impacts by the Shorenstein proposal. 5-6

Stephen Casey is a cyclist who regularly cycles in the Presidio and knows that traffic is already pretty bad. He is concerned that not enough consideration was given to alternative means of transportation. A parking garage violates the original tenets of the GMPA, he believes. 5-7

Mark Middleton, restricting his comments to sections of DEIS summary, believes the regional economy and employment is likely to receive its greatest boost from the Digital Arts Center. And its labor pool will consist of the highest wage earners with the largest tax base. The Digital Arts Center does not compete with local retailers outside the park, while the Shorenstein proposal creates an opportunity to move retail into the park. He suggested hiring a private agency to share responsibility with the Park Police. He prefers the long, sweeping lawn of the Lucas proposal to the Shorenstein approach of an office complex with a park dropped in the middle. Another issue is manageability and profitability, which is assured with the Lucas proposal. Whereas with a mixed-use facility you have a variety of tenants and how do you know they will be able to continue to pay for the space? He said he hoped a decision as important as this would be decided on the merits and not on politics. 5-8

Donald Green said that if the 900,000 square feet is dropped to 700,000, that would reduce the income by a million dollars out of the \$36 million the Trust is hoping for. He said he would like to see something on where the money is going and where it is coming from and how the Trust anticipates using it all. He believes the Trust can get at least 200 additional units of housing by converting the larger duplexes at about \$20 million versus \$40 million for building 200 new units a Letterman. He looks forward to meeting with the Trust and discussing this further. 5-9

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James Morrison (SF Bicycle Advisory Com.) said there is confusion about the number of external trips generated, the press saying 5,700. As a general rule, bike lanes are advisable when you get above 3,000 and should be included at a very early level instead of waiting until a dangerous situation for bicycles is already created.

4
5-10

Bill Francis (Shorenstein-Interland), a managing principal in a parking consultant firm, believes the Shorenstein project has ample parking to serve 150 people. Those employees will be able to live and work in the same area and take the Presidio Village shuttle anywhere in the area. The demand for employee parking will be less because the consultants report for the Trust showed that approximately 220 will not drive because they will be walking from their apartments. So the Shorenstein proposal is the least likely to spill over into the neighborhood and compete with local parking.

5-11

Lucia Bogatay said she hoped in recommendations to the Trust the Commissioners are sympathetic to the difficulty they are probably having striking the right balance between achieving economic goals and preserving the vision of the Presidio as a national park. She said she would reserve detailed design analysis for her written comments.

5-12

Rita Agnese asked for a show of hands by people who drove, took a bus or biked to the meeting. She is concerned that not enough parking will be provided. She resents the two candidates not planning properly for the parking problem they are going to create.

5-13

Buck Kales said that of the two proposals before the Trust, one is plain and simply a politically expedient housing development. The other is, in his opinion, an environmentally sound park within a park. He urged the Board of Directors of the Presidio Trust to support the Lucas proposal for the Digital Center.

5-14

Lynn Simon (Shorenstein-Interland), a sustainable building consultant, said she wanted to share with the Commission a document that their team has put together that addresses their broad-based goals on sustainable development. It is a complicated issue, not a singular issue and is really about diversity, diversity of tenants and diversity of balanced use and mixed use.

5-15

SUPERINTENDENT'S REPORT

Brian O'Neill said there had been two significant developments over the last year that are important to the future of the park. One of is that the Secretaries of Transportation and Interior have signed an MOU to address comprehensively the issue of access to and access within national parks. Golden Gate is one of five parks to be a pilot park in that effort. That was followed up by a MOA signed by Secretary Slater of the DOE and Secretary Babbitt of DOI to launch what is referred to as the Green Energy Parks Program, promoting use of energy efficient and renewable energy technologies. And, again, Golden Gate is one of the pilot parks. Lastly, he said one of the events tied to ESPN X-Games, which San Francisco is hosting, is being proposed to occur out in the Cliff House-Sutro Heights Park area. He said the park is well along in approving the final details of that permit to deal with the impacts of the project on visitor use.

PRESIDIO GENERAL MANAGER'S REPORT

B. J. Griffin said there was a wonderful ceremony recently to commemorate the contributions of the Japanese-American soldiers at the Presidio. Senator Akaka of Hawaii was the keynote speaker. From there they took a ferry to Angel Island because Senator Akaka was instrumental in getting legislation passed that calls for a study of an immigration museum. And Angel Island is the immigration station for the west. The study is underway.

PRESIDIO TRUST DIRECTOR'S REPORT

Jim Meadows said that one of the key issues in making the Presidio a success is their partnership with the NPS. Their planning activities over the summer are going to be concentrating on natural areas and open space at the Presidio. He announced that on June 9,



from 6 to 9 p.m., they will be discussing the vegetation management program. In the public process so far, over 1500 people have been involved in public hearings and public workshops and private neighborhood groups. Also coming up this summer will be the Public Health Service Hospital complex, which will also be a 12-month process. The golf course clubhouse is about 75 percent complete and the opening is scheduled for June 30. The fire station is well on its way to completion and should be occupied by the fire department by July.

COMMITTEE REPORTS

San Francisco Committee. Chairman Jack Spring said the committee met and spent a good deal of time talking about the ESPN Games, and the cooperation between the City, ESPN and the Park Service. But because the committee learned that the Park Service had not been brought into the process until the decisions had been pretty well made, they suggested a letter from the Commission should be addressed concerning future events that are adjacent to or involve park properties.

In addition: the committee had a report on the Fort Mason Officers Club that a satisfactory agreement has been worked out between the Army and NPS; there was a report from Alcatraz on a proposal to install photovoltaic cells on the new industries building, where it would not be obvious to the public that they were there; there was a report that there is a group now working on the Lands End trail; and a report that the Regional Director has committed Building E at Fort Mason to the Maritime National Park for storage of maritime artifacts until October 1, 2000. Lastly, the Superintendent suggested that the committee make a field trip to East Fort Miley to look that over.

Chairman Bartke said, if the Commission wished, he would work on a letter expressing a desire that the Park Service be involved much earlier in the planning process in the future.

Marin Committee: Chairman Merritt Robinson said that in discussing Fort Baker, they recognized that transportation was a key element in keeping peace with Sausalito and having something that really works to benefit society. On the cell site proposal for the Marin Headlands between the tunnel and the bridge, the plan is to use a light tower to hold the antenna itself and cover the supporting equipment with bushes alongside the road. There was an update on the Muir Woods Transportation Study which might include use of the Caltrans parking lot during the weekends.

Presidio Committee: Chairman Kernan said two of the subjects, the Ridge Trail and the EIS, had already been covered. Which left the cell site approval process, about which there were concerns expressed. Committee members were offered the opportunity to tour some of the suggested sites and look at the plans before meeting again. He suggested that occur.

Chairman Bartke said the next meeting would be at 7:30 p.m., on Tuesday; June 15, 1999, in this same room. There being nothing further to come before the Commission, the meeting was adjourned at 10:10 p.m.

There were approximately 100 members of the public present.

Building 201, Fort Mason, San Francisco, CA 94123



Responses to Comments in Letter 5

5 - 1

Regarding parking availability and developer mitigation of parking, see master response 20. Regarding emissions, see the response to comment 3-6.

5 - 2

Comment noted. The California Indian Museum is a proposed tenant of Presidio Village.

5 - 3

The commentor's support for the Digital Arts Center is noted for the record. The EIS did not quantitatively address weekend and evening traffic demands because analysis of weekday, evening and weekend traffic (NPS 1999f) indicated that the highest traffic occurs during weekday peak hours. Designing to handle that level of traffic would also accommodate demands on the weekends and in the evening. Tourist and special event buses are being addressed park-wide in the Presidio Trust's Tour Bus Management Study. The data collection phase for this study is complete and the Trust is expected to enter the analysis and recommendations phase in 2000. Neighborhood meetings will be an important part of this study. Refer to master response 18 regarding proposed new intersections at the Gorgas Avenue Gate.

5 - 4

Comment noted. The documents were forwarded to the Presidio Trust for review and consideration.

5 - 5

Please refer to responses to comments 4-1 through 4-3.

5 - 6

In addition to the number of employees at a facility, the type of activity affects the trips generated by a particular use. For example, while the employee density may be similar between research and development (R&D) and office uses, R&D facilities typically have a lower number of non-work trips (e.g., deliveries, visitors, and out-of-office meetings). In addition, the distribution of trips throughout the day varies between office and R&D uses. As a result, the daily and the p.m. peak-hour trip generation is lower for R&D than for office uses. It should be noted that the employment density is not substantially different between Alternatives 4 and 5. The average employment density is between 309 and 375 square feet per employee for Alternative 4 (range of 1,400 to 1,700 employees), and about 360 square feet per employee for Alternative 5.

For alternatives that included residential units that would be available to employees at the 23-acre site, a credit was applied to the residential component, and therefore the internal trips due to the onsite housing were incorporated into the trip-generation estimates. The residential credit assumed that half of the work trips associated with each dwelling unit would be internal to the site.

A consistent geographic distribution of employee and visitor trips to and from the Letterman Complex was applied to all development alternatives. This geographic distribution was based on a 1998 survey at the Presidio. Overall, about 55 percent of trips (both employee and visitors) are expected to start or end within

San Francisco, 24 percent in the East Bay, 14 percent in the North Bay and 7 percent in the South Bay. This distribution was confirmed in a recent 1999 employee survey. While it is possible that 75 percent of CNET employees live in San Francisco, detailed documentation of the survey was not provided. In addition, CNET would only be one of a number of tenants that would occupy the office complex in Alternative 4. See the response to comment 1-4 relative to CNET's mode split.

Impacts associated with vehicular traffic generated by Alternative 4 were mitigated to a less-than-significant level by the implementation of intersection improvements (TR-2 and TR-3) at the intersection of Gorgas Avenue/Richardson Avenue/Lombard Street. These mitigation measures are common to Alternatives 1 through 5.

5 - 7

Refer to master response 19 regarding TDM measures to reduce automobile transportation. The GMPA does not specifically address underground parking; it neither advocates nor prohibits it. Rather, the GMPA identified a number of parking spaces Presidio-wide as well as by specific planning area to be provided to support new park programs and uses. Then it becomes a design question as to how these spaces are provided — either in surface lots or underground parking. The benefit of providing the spaces underground is that it allows for more public open space in areas currently covered in asphalt. The Presidio Trust requested that the development teams consider underground parking to maximize the amount of open space at the 23-acre site.

5 - 8

Comments noted. The impacts of the alternatives on the local economy, law enforcement and open space are discussed in Section 4 and Appendix A of the Draft EIS and Final EIS. The Presidio Trust identified its preferred alternative among the alternatives presented in the Draft EIS, using the criteria discussed in the document and considering the variety of information contained in the document concerning the environmental and other impacts of each alternative.

5 - 9

The commentor is referred to the Financial Management Program (Appendix E of the Final EIS) for a projection of revenues and expenditures associated with Presidio Trust programs. If replacement construction at the 23-acre site was reduced from 900,000 square feet to 700,000 square feet, with no corresponding increase of replacement construction elsewhere, the Presidio Trust would lose approximately \$2 to \$3 million of annual revenue, resulting in a deficit of \$2 to \$3 million in fiscal year 2013. The commentor's suggestion that subdivision of larger duplex housing units could create 200 additional housing units is noted for potential future study. Please refer also to master responses 10A and 10B.

5 - 1 0

The maximum number of daily external vehicle trips in and out of the complex is 5,140 (Alternative 4). The need for bike lanes is not a function of external vehicle trips coming in at various points, but a function of factors relating to a given street such as traffic volumes, traffic speeds, bicycle volumes, inclusion on a signed



L E T T E R 5

bicycle route, and whether the street is wide enough to accommodate the lanes safely. Please refer to mitigation measures TR-6 and TR-7 in the Final EIS.

5 - 1 1

Comment noted. Please note that the comment was intended to refer to parking for 1,500 persons, and not for 150 people as reported in the minutes. The impacts of parking demand and supply are summarized in Table 11 of the Final EIS.

5 - 1 2

Comments noted. Please refer to Letter 65 to review the comments submitted by the Commissioners to the Presidio Trust Board for their consideration, and to Letter 33 for the speaker's written comments.

5 - 1 3

Refer to master response 20.

5 - 1 4

The speaker's preference for Alternative 5 is noted for the record.

5 - 1 5

Please refer to response to comment 5-4.



Letter 6

May 19, 1999

Statement regarding Presidio/Letterman Development

The people in my neighborhood of Richardson, Lyon and Francisco endorse the Letterman Digital Proposal. However we do have some serious concerns re: parking and traffic.

The ingress & egress elements of the EIS are flawed & these should be addressed before any action is taken.

6-1

EIS does not address: The additional congestion and pollution and traffic and parking problems which will be caused by weekend and evening traffic the Shorestein proposal will create. Nor has the EIS addressed the tourist and special event busses or alternative routes and ramps for cars and construction vehicles that would mitigate traffic in the interim stage of development.

6-2

The proposed traffic light change at Francisco and Richardson will not allow my neighbors and me access to our garages. We need a frontage road from Francisco to Lyon, which will allow us access to our garages. Has a study been done regarding the flow of traffic if all these new stop lights are built?

6-3

Has anyone considered the quality of life for us as neighbors? If so why the decision to develop 900,000 sq.ft. Why such density and why before Doyle Drive is rebuilt?

6-4

Letterman Digital Proposal is the plan that will have the least negative impact upon the neighborhood and the Presidio and will enhance the Presidio as a National Park.

Marianne Cavalier 921-0684



Responses to Comments in Letter 6

6 - 1

Comment noted; please see following comments 6-2 and 6-3 for specific responses.

6 - 2

Table D-11 within the EIS addresses weekend parking. Weekend and evening traffic was not addressed in identifying traffic mitigations because the sum of existing traffic plus traffic generated by any of the alternatives would be highest during weekdays. As noted by the commentor and in the EIS, Alternative 4, given its mix of office, residential and hotel, would be more likely to have higher traffic volumes on weekends and evenings than alternatives which do not have residential or hotel uses.

See the response to comment 5-3 for a discussion of tourist and special event buses.

The proposed routes for construction vehicles are shown in Figure 19 and discussed in Section 4.1.7.7 of the EIS. A construction traffic management plan as discussed in mitigation measure TR-5, *Construction Traffic Management Plan* would be developed to further specify routes, times of operation, and other factors to mitigate construction impacts on neighbors both inside and outside the park.

6 - 3

Please refer to master responses 18 and 20.

6 - 4

Please refer to Section 1.2 of the Final EIS and master responses 10A, 17, and 21.



Letter 7

NATIONAL AUDUBON SOCIETY, GOLDEN GATE CHAPTER * NATIONAL PARKS AND CONSERVATION ASSOCIATION * NATIONAL TRUST FOR HISTORIC PRESERVATION * NATURAL RESOURCES DEFENSE COUNCIL * SAN FRANCISCO LEAGUE OF CONSERVATION VOTERS * THE WILDERNESS SOCIETY * YERBA BUENA CHAPTER, CALIFORNIA NATIVE PLANT SOCIETY

24 May 1999

James Meadows
Executive Director
The Presidio Trust
P. O. Box 29052
San Francisco, CA 94129-0052



Dear Mr. Meadows:

The undersigned organizations regret to inform you that we cannot support the process by which the Presidio Trust intends to select the developer for the Letterman complex. As currently structured, this process ignores clear statutory mandates, including the mandate for meaningful involvement by the public. If the current process is not revised, we fear that it will undermine the Presidio Trust's credibility. Not only will the publicly supported vision for the Presidio fail, but so will the Trust's mandate for financial self sufficiency.

We do not make this statement lightly. As a community, we supported the Presidio Trust legislation and, like you, take seriously the responsibilities placed by that law on the Trust, the National Park Service, and the public. However, unless course corrections are made to this process, the precedent set at Letterman is likely to result in greater confusion and controversy with each subsequent planning effort. The Trust has embarked on a process that does not comply with applicable law.

The National Environmental Policy Act (NEPA) sets forth clear requirements with which agencies must comply in making decisions involving major federal actions, such as the planning and decisionmaking for Letterman. We believed the Trust understood these requirements when it chose to adopt the National Park Service's NEPA guidelines and entered into a Memorandum of Understanding with the Service over NEPA implementation. Unfortunately, this was not the case. In particular, we believe that the Request for Proposals for Letterman varied so substantially from the Presidio General Management Plan that an amendment should have been prepared pursuant to NEPA. Of equal importance, we believe that selection of the Letterman developer, while the public comment period on the draft Letterman EIS is still open, is also a violation of that Act. As the result of these violations, the public has been denied the opportunity for adequate and meaningful comment that NEPA was intended to provide.

We wish to meet with you and your General Counsel, before you proceed any further, to discuss these and other issues in the hope that we can correct these fatal errors to the NEPA process. We

7-1



James Meadows
May 24, 1999
Page Two

are very mindful of the time restrictions placed on the Trust. The statutory deadline for self-sufficiency, however, cannot excuse the Trust's failure to meet its non-discretionary obligations to comply fully with NEPA.

7-1

Sincerely,



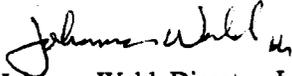
Arthur Feinstein, Executive Director
National Audubon Society, Golden Gate Chapter



Brian Huse, Director, Pacific Region
National Parks and Conservation Association



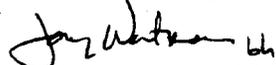
Elizabeth Goldstein, Director, Western Office
National Trust for Historic Preservation



Johanna Wald, Director, Land Program
Natural Resources Defense Council



Amandeep Jawa, President
San Francisco League of Conservation Voters



Jay Watson, Regional Director
The Wilderness Society



Pete Holloran, President
Yerba Buena Chapter, California Native Plant Society



Response to Comment in Letter 7

7 - 1

The Trust recognizes and appreciates the long-term commitment of the commenting organizations to the protection of the natural, cultural and historical resources of the Presidio, appreciates the opportunity to have opened up a working dialogue with these groups, and welcomes the opportunity to continue to work with these and various other organizations towards those goals. In response to the commentors' request, the Presidio Trust through its Executive Director and/or its General Counsel has met with this group of organizations on several occasions to discuss issues of concern. For response to the comment concerning compliance with applicable law and opportunities for meaningful public comment and involvement, refer to master responses 1A and 1E. For response to the comment concerning the need to amend the GMPA, refer to master response 2B. For response to the comment concerning the apparent selection of a developer during public comment, refer to master response 6B and Section 5.2 of the Final EIS.



Letter 8



PRESIDIO TRUST REC'D

1999 MAY 21 10 28 52
PRESIDIO TASK FORCE

May 26, 1999

VIA FAX 561-5315

The Board of Directors
The Presidio Trust
34 Graham St.
Presidio of San Francisco CA 94129

Comments on Letterman Draft EIS as they Affect the Selection of a Preferred Alternative

Dear Board Members:

Today or tomorrow, you are expected to select your Preferred Alternative proposal for the Letterman Complex. While the Sierra Club's analysis of the Letterman Draft EIS is not complete, we wish to comment on two items which may influence your difficult decision.

TRAFFIC IMPACTS.

We would like to draw your attention to significant errors in the DEIS regarding traffic impacts. Our analysis generally agrees with that of that of JUD Consultants' that the DEIS applies erroneous assumptions which result in overstated traffic impacts for the Shorenstein/ Interland Presidio Village alternative.

8-1

The DEIS says that Presidio Village will generate 5,700 weekday vehicle trips that go outside of the Presidio, compared to Lucas's Digital Arts Center's 4,360 trips. Revised calculations show that Presidio Village will generate an estimated 2,900 trips. To put it simply, instead of Presidio Village generating 1/3 more weekday traffic than the Lucas proposal, it will generate 1/3 less.

HOUSING.

We are convinced that locating Letterman housing close to Chestnut Street's abundant services offers the best opportunity to reduce traffic impacts and provide the highest quality of life for

8-2

¹ Letter to Presidio Trust, May 1, 1999, presented at GGNRA Advisory Commission meeting, May 18, 1999.

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Presidio Trust Board
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residents of the park and the adjacent neighborhood. Presidio Village housing is less than 1/4 mile from Chestnut St. stores. Numerous studies of successful pedestrian-friendly neighborhoods have shown that 1/4 mile is the maximum distance people will walk for goods and services.

It has been suggested that housing for the Lucas proposal instead could be built at the western end of the Letterman Complex, closer to Halleck St. Such housing will be at least 1/2 mile from Chestnut St., which will guarantee higher automobile use. Discouraging auto trips from the western site will require a more expensive transportation system, or the need to (inappropriately and inefficiently) provide those shops and services within the park.

8-2

Whatever your decision, we look forward to your conduct of negotiations which will produce the highest quality of urban and architectural design and wonderful experiences for the Presidio's visitors.

We will comment more fully on the DEIS, including further analysis of the traffic impacts, by the comment deadline.

Yours sincerely,



Michael Alexander
Chair



Responses to Comments in Letter 8

8 - 1

See the responses to comments 1-1 and 1-4.

8 - 2

As discussed in Section 2.7, the preferred alternative does not include provisions for housing. The commentor's assertion that locating housing close to Chestnut Street's services offers the best opportunity to reduce traffic impacts is noted for the record.

Letter 9

UNIVERSITY OF CALIFORNIA, BERKELEY

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Cherilyn Widell
Compliance and Permitting Manager
The Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

5/28/99

Dear Cherilyn:

Many thanks for sending me the information on the draft environmental impact statement involving the proposed projects for the Letterman site on the Presidio. I also appreciate the invitation to attend the June 10th meeting that will discuss the potential effects of the proposed projects on cultural properties in the Letterman site area. Unfortunately, I will be unable to attend the meeting. But I did not want to send you my comments on the draft environmental impact statement.

In regards to my concerns about the archaeological remains and cultural resources that may be impacted by the proposed projects, I feel that they are sufficiently addressed in the draft environmental impact statement. Adverse effects of construction or significant modifications to the existing the cultural landscape will be addressed by archaeological testing prior to construction, as well as systematic monitoring during construction. I think your plan to require preconstruction archaeological testing is excellent. As the draft environmental impact statement indicates, the likelihood of detecting either prehistoric or historic archaeological remains in the Letterman area is quite high – especially given its proximity to the prehistoric/historic bayshore. It will save the Presidio Trust considerable time and aggravation to locate archaeological remains in the impact areas prior to any construction work.

9-1

Again, many thanks for inviting me to the June 10th meeting. I am sorry that I can not make it. Let me know if you have any questions about my comments above, or if I can be of any assistance.

Sincerely,

A handwritten signature in cursive script that reads "Kent G. Lightfoot".

Kent G. Lightfoot
Professor of Anthropology



Response to Comment in Letter 9

9 - 1

Thank you for your letter. The commentor's opinion on the adequacy of the archeological monitoring program is noted for the record. Also, please refer to the Archeological Management and Assessment Program in Appendix A to Appendix F of the Final EIS.



Letter 10

2831 Cabrillo Street
San Francisco, CA 94121
Phone (415) 752-9412
June 7, 1999



NEPA Compliance Coordinator
Attn: Letterman Complex
Presidio Trust, 34 Graham Street
P.O.Box 29052
San Francisco, CA 94129-0052

This is to provide comments on the **DRAFT** (dated April 1999) "EIS and Planning Guidelines for New Development and Uses within the Presidio's Letterman Complex." As a private individual, it seems to me that this subject has not been adequately explored; several highly-significant conditions have changed since the 1994 GMPA. I believe the Draft Amendment to the EIS is inadequate and therefore it is presently unacceptable for the following reasons:

1. **PIECEMEAL PRESENTATION OF OVERALL PLANNING CONCEPTS**

For publicly owned and supported agencies there is a continuing responsibility to develop a **COMPREHENSIVE MULTI-YEARED PLANNING DOCUMENT**, typically for five years into the future but updated on a yearly basis. Necessarily that many of the factors of such plans are synergistically related and thus cannot be taken out of the fuller context.

With specific regard to the April 1999 Draft EIS, there needs to be a full discussion and analysis of:

- * The intended/proposed uses of the **ENTIRE** 60 (sixty!) acre Letterman complex -- not just a snapshot limited to the 23 acres!
- * The **ENTIRE** 1500-acre Presidio -- not limited to just the 23 acres or 60 acres!

10-1

At public meetings it has been stated -- repeatedly -- that "replacement new construction is not required to occur in the exact footprint of the location where buildings are demolished." For that principle to be truly applicable, the **COMPREHENSIVE** Draft EIS & Master Planning Document must provide the public with alternative analyses on critical topics such as:

- A. **EMPLOYEE HOUSING.** Additional (and/or replacement) housing units could be located -- alternatively -- along Lincoln Blvd (1500 area), along Washington Blvd (400 area) and/or along Quarry Road (800 area) or wherever --but not limited to the 23 acres in "Letterman Complex."
- B. **HOTEL/INN AND/OR SENIOR HOUSING.** Similarly if the Trust's Comprehensive Planning Guidelines are to include a hotel or inn or senior housing (utilizing allowable square footages generated by a comparable demolition anywhere on Presidio), analyses should be provided for alternative sites (not limited to LAMC/LAIR's footprint). Such sites might -- conceivably -- include LAMC/LAIR or the site of Army's former consolidated Motor Pool or existing Commissary (600 area) or at former Public Health Hospital (1800 area) or wherever! But again, not limited to the 23 acres.



C. **OFFICE BUILDINGS** (general purpose, film labs, multi-media or any other special use). Again, the 1999 Supplement to the 1994 GMPA should address a variety of alternative sites for these purposes, recognizing that some of the limitations presented in the 1994 document (now obsolete) are no longer applicable. For example, the Sixth Army is obviously no longer a "tenant" at Presidio.

10-1

Summarizing, my point is that the April 1999 **DRAFT** EIS is intrinsically flawed and unacceptable in that it fails to discuss the inherent synergistic effects of a decision about LAMC/LAIR's "23 acres" upon the entire 60-acre plot and upon the Presidio as a complete entity (1500 acres).

It's generally agreed that whatever is placed or retained in the LAMC/LAIR footprint is very important, as this "anchor tenant" could have a disproportionately-large impact upon the overall Presidio planning. Accordingly this sub-plan must not be piece-mealed out of the fuller context.

2. **TRAFFIC ANALYSIS -- INCLUSIVE OF DOYLE DRIVE "RELOCATION"**

10-2

Although the extensive public use now being made of Army's former Gym and Pool (Bldgs 1152 & 1151, under YMCA's auspices) is highly commendable, it's created a Russian Roulette situation wherein the exuberant children are being placed under significant risk to vehicular traffic along Gorgas Avenue. The present situation is bad! But it emphasizes that any future development must be guided by full understanding of impacts of Doyle Drive. It's understood that results of preliminary engineering and design efforts for this Doyle Drive reconstruction are expected within a year or two (2001?). Obviously development of plans for 23/60-acre Letterman Complex must be carried out proactively and collaboratively with CalTrans and CCSF to avoid an unnecessary fiasco -- comparable to what's now ongoing over the alignment of the Bay Bridge on Yerba Buena Island.

3. **HEALTH CARE IN SAN FRANCISCO BAY AREA**

The NPS's final GMPA & EIS (July 1994) touched briefly upon the impacts of the potential losses of both LAMC and the former Public Health Service Hospital. It was stated (pages 174-175) that their loss (to the larger community) would have **NO** impact upon **ACUTE** care facilities because there was then (1991) an oversupply of acute-care beds, but an adverse impact upon **LONG-TERM** chronic care facilities because even then (early 1990's) there was an "unmet demand" for chronic care beds.

10-3

During the ensuing years -- from 1991 to 1999 -- there seems to have been a dramatic change in the availability of all such facilities. And it is possible that during the next few years there will be urgent need for additional hospital beds for both acute-care and chronic long-term care. I do not profess to be offering a comprehensive analysis! But before the Presidio Trust can be said to have completed a comprehensive and objective EIS, it must address the fact that the existing publicly-owned (presently inactive) hospital facilities on Presidio (Bldgs 1100 and 1801) have a substantial potential reuse value (of perhaps \$500,000,000) and that **BEFORE** demolition of these publicly-owned facilities is started at either site there is an obligation to produce a **COMPREHENSIVE** EIS dealing with new factors, including:

A. **SENATE BILL 1953 (SEISMIC UPGRADES)**. This is a 1994 California law that requires all acute-care facilities to meet certain seismic safety standards by the year 2008. Before Jan 1, 2001, each hospital must submit a seismic renovation plan outlining what it will do over the next seven years to achieve compliance. In some cases it might be necessary for hospitals to abandon



abandon their present structures and rebuild. But even if only retrofit (seismic bracing) is required, it is predictable that during the next decades there will be a substantial loss of available hospital beds as major renovations are ongoing.

- B. **LONG-TERM CARE -- LAGUNA HONDA (?)** During the past year the people of San Francisco have become informed about the deplorable condition of our massive (1200-bed) Laguna Honda facility. Planning for replacement and/or reconstruction is only now starting. Meanwhile some knowledgeable experts contend that many of the elderly and infirm could receive better and less-costly care if smaller facilities were developed in each of the city's neighborhoods, more reflective of the cultural flavor and needs of the residents and more conducive to frequent visits by families and other loved ones. Surely it would be a better use of Bldg 1801 and/or 1100 to convert either (or both) to long-term health care facilities for the aged and disabled instead of the creation of mountains of concrete and reinforced steel rubble.
- C. **CLOSURE OF MANY HOSPITALS.** With the heavy commercialization of medical care and the growing competitiveness of for-profit HMO's, many hospitals (throughout the United States) have been shut down during the past few years (since 1994). And there are now reports of impending **SHORTAGES** of hospital beds within the San Francisco Bay area.
- D. **SWING SPACE.** In any of the scenarios -- whether Laguna Honda and specific acute-care hospitals are rebuilt (at same location) or dispersed to smaller (new) facilities -- there will probably be an extended transition period of 5-10 years when patients will need to be diverted to other facilities while major construction is ongoing. Again, with minimal costs possibly either 1801 or 1100 could be restored to active status to relieve this probable crunch, scarcity of hospital beds.
- E. **"ISSUES WHICH ARE RIPE FOR DISCUSSION."** Per discussion on the required scope of the revised Environmental Screening Form (ESF) continued in Appendix A of the April 1999 Draft EIS, the NEPA encourages the use of "tiered," non-repetitive, documents. Based upon the plethora of recent newspaper articles on the present tumultuous state of both short-term (acute) and long-term (chronic) medical care facilities in the San Francisco Bay area, it appears that this is an issue now ripe for discussion in the amended and/or updated EIS.

10-3

I personally do not profess to know what the final outcome of such an analysis might be, but the door should be kept open for the possible establishment of a premier (world class), new publicly- owned facility for children somewhere on the Presidio (possibly in the Letterman Complex) which some authorities assert is "desperately needed." Having a world-class children's hospital as an anchor tenant at Presidio would greatly enhance its status as a National Park and recreation area!

The attached recent newspaper articles indicate that the time is "now ripe" for intensive investigation of health care issues in the EIS prior to demolitions of 1800, 1100 or 1110. See attached list of references.

4. **BIOMEDICAL RESEARCH (LAIR)**

The April 1999 Draft EIS purports to summarize a National Park Service funded Letterman Complex Assessment (BAR, April 1993). However, the Draft EIS (pages 57-58) provides only a biased, negative and distorted view of the reuse opportunities of these facilities. And no clear distinction is made between the "identified possible deficiencies" of LAMC and those of LAIR.

10-4

For example, by careful searching of the source document (BAR 1993) it seems that only the first bullet ("lack of light and air" on page 58) is applicable to LAIR. And that comment (by BAR) was apparently made only within the context of possible conversion of LAIR's animal rooms to office use (page 109).



Further, the Draft EIS fails to acknowledge the summary statements by BAR (pages 107 and 110) that:

- * *"This structure is a massive building which cannot be easily demolished. It has been well used and should provide great value for the future if it continues to be used for the purposes for which it was designed. Its life expectancy is not forever but absent a significant seismic event, and assuming continued diligent maintenance and reasonable upgrading of systems as needed, its lifespan should be indefinite."*
- * *"This (LAIR) is a specialized, well-built and well-maintained facility which would really be best-suited for the animal research it was originally designed for."*
- * *"This facility (LAIR) has had some system upgrades as well over the years. Its structural system is probably adequate for current seismic requirements. In addition, the quality of the original workmanship is high, and the atrium spaces and associated circulation are very pleasant. It is, in short, well designed, well built and well maintained. Every effort should be made to find a future use in keeping with the high quality of the facility."*

The cost estimates by McLellan & Copenhagen (1992) and essentially confirmed by BAR (1993) were in the range of \$28-65 per gross square foot (\$12-44 million) to renovate LAIR. The differences in estimates were based upon various options (1, 2, 4 & 5) for functional distribution of the existing building (nearly 280,000 square feet) amongst Administration, Laboratory and Animal Facilities. These estimates (\$28-65/SF) are incredibly "cheap" (a real bargain!) as compared to the \$1,000/SF often estimated for new construction of comparable facilities.

10-4

Furthermore, some of the specific recommendations made by BAR in the 1992 and 1993 engineering studies related to a stand-alone steam/heating plant, HVAC chiller and emergency generator's fuel oil system (pages 113-115) have now already been completed (1998).

As part of the contemporary EIS, Trust's analysis needs to go beyond the bland statement (page 57) that "competition between small biomedic companies for lab space is strong, with the vacancy rate for research and development space in San Francisco below 1 percent". Doesn't this finding imply that there could be a great opportunity for leasing out LAIR essentially as is?

Furthermore, although UCSF has intensive **PLANS** for its 2.65 million square feet research center on the 43-acre Mission Bay campus, their proposed Animal Care Facility (16B) of 85,000-115,000 square feet (almost identical in size to LAIR) is not projected for completion until approximately the year 2020 as a component of UCSF's Phase 3 (UCSF "Mission Bay Campus Master Plan & Guidelines," April 1, 1999). Thus it would seem that perhaps the NPS/Presidio Trust's marketing efforts may not have been sufficiently aggressive in regard to finding a suitable tenant at LAIR.

Referring again to the Draft EIS (April 1999) on page 58, it appears that all other cited deficiencies (except the first) were taken verbatim from the list of significant deficiencies given by BAR (April 1993, page 3) for LAMC (not LAIR!), which were made in the context of evaluating conversion of this former general-purpose hospital (designed in the 1960's) into a state-of-the-art pediatrics hospital for the 21st century. A convincing case has indeed been made by the several engineering specialists (BAR 1993) that such a conversion would be very costly and probably not feasible. However the Trust's EIS should then address the fundamental question of what type of facility (children's hospital? hotel? film studio? general office building? shopping center? housing?) would be most desirable at this particular footprint (LAMC's) of this National Park.



5. ACCESS TO PRESIDIO BY VISITORS TO THE "NATIONAL RECREATION AREA"

Much of the discussion in Draft Supplement to the GMPA concerns traffic impacts within the Presidio itself plus the immediately-adjacent neighborhood (eastward of Richardson) when/if activities are resumed in the space now occupied by presently-inactive LAMC/LAIR. Presumably under any conceivable alternative (except total demolition of LAMC/LAIR and restoration of this 23-acre plot to its original "natural-state" -- grass and trees), there would, again, be significant traffic (automobile, truck, bicycle and pedestrian) into and out of Presidio via Lombard Street Gate -- comparable to what occurred during the time span of at least 60 years beginning in the 1940's as the Army's medical facilities ratcheted up to serve national needs during World War II. Thus it is probable that under any plausible scenario the recent lull (since Army's Base Closure of 1994) in Presidio Gate traffic will soon end. And quite properly the Amended EIS should address this and negotiate with the immediate neighbors some sort of satisfactory resolution to the traffic impacts upon this specific neighborhood.

However, while these *NEIGHBORHOOD* constituents -- including Cow Hollow, Marina, Pacific Heights, Richmond, etc. -- will have a pressing interest to maintain the status quo (since 1994) of minimal traffic in/out of Presidio, there must be strong advocacy for the fact that Presidio is being supported by the *FEDERAL GOVERNMENT* -- not by the CCSF nor by State of California nor by local neighborhood associations -- to serve as a *NATIONAL* Recreation Area. As a neighbor to the Presidio myself, I like the fact that I benefit from having a "big back yard" (the Presidio) which is largely undeveloped and provides me with great freedom to roam about and enjoy for my own personal benefit -- at no cost.

However, to be truly sustainable into perpetuity I believe the NPS and the Trust have an obligation to assure that this area is truly accessible to the *GENERAL PUBLIC* so that 10-50 years from now the Presidio will not be degraded into the status of a "special backyard" for its generally well-to-do immediate neighbors or a "special enclave" for the employees of NPS, Presidio Trust, plus its tenants, who enjoy exclusive access to this property as though they were somehow selected for inclusion in a privileged "country club." To prevent this undesired outcome of exclusivity, I believe that it's essential that the Planners include in the EIS and Planning Guidelines for the *ENTIRE* Presidio a thorough discussion of the actions that could/would be taken to ensure greater access by the General Public. Topics to be discussed should include:

10-5

- A. **PRESIDIO EXITS (BOTH DIRECTIONS) FROM DOYLE DRIVE** -- under anticipated new alignments. Presumably this is now under a fairly advanced conceptual stage wherein the general public can review and comment upon alternatives.
- B. **WATER TAXI AND/OR FERRY DOCK** -- Again, presumably the Planners can now share (within the EIS) how/where the docking facilities will be located (on Crissy Field Beach?) to permit water access to Presidio from San Francisco Airport, Ferry Building at end of Market Street, Fort Baker, Alameda, Treasure Island, Oakland, etc.
- C. **BAY AREA RIDGE TRAIL.** A splendid concept, new since 1994.
- D. **OPENING UP OF PRESENTLY-ABANDONED RAILROAD TUNNEL UNDER UPPER FORT MASON.** Once accomplished, this will permit visitors (pedestrians, bikers, joggers, skateboarders, wheel chairs) an unimpeded level path (no steep hills) along the entire San Francisco waterfront from China Basin, via Herb Caen Promenade, thru Fishermans' Wharf district, under Upper Fort Mason, along Marina Green and thence thru Crissy Field to Fort Point. Presently a typical tourist (who might be staying at a hotel near Union Square while attending a trade show at Moscone Center) would be inclined to use an automobile to visit Fishermans' Wharf and then again (second use of auto) to visit Presidio and/or Fort Point. By opening up the Fort Mason Railroad Tunnel, this route would probably join the Boston Freedom Trail and a "walking tour of Paris" as one of the world's finest non-polluting, environmentally-correct recreational activities, and would bring great credit to the GGNRA's and Trust's stewardship of these properties.

Richard Hansen




Attachments:

References for Section #3E

"State's Hospitals on Shaky Grounds -- Costly Seismic Safety Codes May Force Some Out of Business," S.F. Examiner 1/31/99

"How Will the Bay Area Region Comply When It Comes To Seismic Safety," Regionwise, Newsletter for Catholic Healthcare West, March 1999

"Mt. Zion May Quit Acute Care -- Hints That S.F. Hospital Will Close Emergency Room," S.F. Chronicle 5/20/99

"Inpatient Care at Mt. Zion in Danger. Cutbacks Rumored at Mt. Zion," S.F. Examiner 5/20/99

"S.F. General Hospital Is Falling Apart, Workers Say," S.F. Chronicle 3/24/99

"Giant Grant for Children's Health Care" (expected to include a new health care facility in San Francisco for children), S.F. Chronicle 3/24/99

"Packard Grants Would Create Huge Children's Health Center," S.F. Chronicle 3/24/99

"New Hospital Likely to the City's Kids -- Packard Foundation Offers Funding to UCSF Stanford," S.F. Chronicle 3/24/99

"Fears of East Bay Hospital Monopoly -- Shutting Oakland's Kaiser Will Leave Sutter Dominant" (number of private hospitals in Berkeley and Oakland is set to plummet from five in 1992 to just one), S.F. Examiner 5/10/99

"AIDS Doctors in Quandary With Closure of Davies," S.F. Examiner 5/14/99

"Laguna Honda Plan Is a Boondoggle" (prefers smaller facilities in each of city's neighborhoods rather than a single mega facility "warehouse"), S.F. Examiner 5/15/99, Letter to Editor.

"San Francisco Needs Laguna Honda," S.F. Examiner 5/10/99

"Hospital Merger a Fiscal Horror Story -- UCSF Stanford Deal Hemorrhaging Money, Not Saving It," S.F. Examiner 5/24/99.



Responses to Comments in Letter 10

1 0 - 1

For response to the comment concerning the need for a comprehensive planning document and concerns with piecemeal planning, refer to master response 4A. For response to the comment concerning the need to provide alternative analyses on employee housing, hotel and/or senior housing, and office buildings, refer both to master responses 4A, 4B, and 6A.

1 0 - 2

The Presidio Trust shares the commentor's concerns for pedestrian safety on Gorgas Avenue, which are noted for the record. See master response 21 regarding Doyle Drive. Also refer to the Planning Guidelines in Appendix B of the Final EIS for design principles on access, circulation and parking.

1 0 - 3

As discussed on page A-9 of the Draft EIS, the impacts of the closure of LAMC/LAIR were analyzed in the Army Base Closure Final EIS. The 1994 GMPA EIS, Alternative D considered the continued use of LAMC as a hospital. Thus, the analysis of continued hospital use of LAMC is provided in those two documents.

The NPS issued an RFQ for reuse of the Letterman Complex in 1994 that received 16 proposals. From June 1994 through December 1994, NPS negotiated with the University of California, San Francisco without success for the university to reuse LAMC and LAIR for a medical research facility. In that RFQ process, two proposers suggested that LAMC be reused as a Veteran's Administration hospital. However, the Veteran's Administration itself did not indicate such an interest, nor did any other hospital user.

Later, NPS negotiated with the City of San Francisco Department of Public Health (DPH) for use of LAIR as laboratory and office space. The DPH is responsible for management of Laguna Honda Hospital and other city health care facilities, and has not indicated an interest in using LAMC to either NPS or the Trust. (DPH did evaluate re-use of the Public Health Service Hospital as a hospice/long-term care facility.) Note that to use LAMC as "swing space" for Laguna Honda or other needs for hospital use would require it be renovated to meet code requirements for hospital use.

Finally, notice of the RFQ for the Presidio Trust's planned development of the Letterman Complex was sent to area hospitals. None of the hospitals indicated any interest in re-using LAMC. For further response to these comments, please refer to master response 6A.

The commentor suggests that LAMC should be considered for long-term care for the elderly. Senior housing providers have expressed considerable interest in locating at the Presidio, particularly at the Public Health Service Hospital site. Alternative 3 includes a senior housing component within its tenant mix. Otherwise, none of the senior housing providers that expressed interest in the Presidio have inquired about re-using LAMC as a senior care facility.

1 0 - 4

In response to the comment, the text of the Final EIS has been revised to delineate which deficiencies apply to LAIR and which to LAMC. BAR (1993, in the Final EIS) cites a 1992 cost estimate range of \$28 to \$65 per square foot for renovation. The cost estimate range is for the re-use of LAIR as an institutional laboratory research facility. As discussed above, no users for such a research facility have been identified. Conversion to a multi-tenant research facility would have a significantly greater cost. Neither the market nor the public support the re-use of LAIR as an animal research facility.

For further response to comments concerning the scope of leasing opportunities available for the LAMC/LAIR facilities, please refer to master responses 6A and 2A and Sections 2.1 and 1.2 of the Final EIS.

1 0 - 5

The long-term goals and actions to improve public access to the Presidio are addressed in the 1994 GMPA EIS, from which this EIS tiers. Discussions of how each alternative contributes to these actions are provided in Sections 4.1.1.2 through 4.6.1.2 (Presidio General Management Plan Amendment) of the EIS.

