

Letter 31



VISUAL EFFECTS SOCIETY

PRESIDIO TRUST REC'D

REC'D - X 8-1-99
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August 2, 1999

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

Sent Via Fax: 415 561-5315
Hard Copy to Follow

Dear Mr. Pelka,

On behalf of the Visual Effects Society, I am writing this letter to illustrate support for the Letterman Digital Center. It is our understanding that the Presidio Trust's general objectives are to create a complex that serves the community through the arts, education, research, innovation and communication. As we approach the next millenium, digital imaging technology will be in the forefront of all future technology development for both the entertainment industry, as well as, for many traditional types of businesses. Lucas Digital has been and will be the leader in digital imaging technology, and as such, is poised to make the Letterman Complex a truly valuable asset to not only the San Francisco Bay Area, but to the world.

Lucas Digital, and specifically, Industrial Light + Magic have produced a tremendous amount of valuable information for the entire digital imaging industry. These efforts have been recognized by the Academy of Motion Pictures Arts and Sciences with not only fourteen awards for "Best Visual Effects", but equally important with fourteen additional awards for scientific and technical achievement. The combination of artistic excellence with technical research and development has clearly made Lucas Digital the recognized world leader in this arena.

The San Francisco Bay Area, specifically the Presidio, has the opportunity to combine the charm and cultural history of the Bay Area to a major aspect of the future of entertainment and business. Digital Imaging is a tool that will have as much influence on media and educational development as the introduction of color had to filmmaking. The Lucas companies offer the Presidio the great potential of building a digital imaging facility that will continue to lead the world in this arena. There is no other organization which has the experience, assets, recognition and wealth of talented artists that can bring to the Presidio and the San Francisco Bay Area what Lucas Digital offers.

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31-1

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VISUAL EFFECTS SOCIETY

Page Two
John Pelka
NEPA Coordinator

The Visual Effects Society strongly supports the Letterman Complex with the Lucas Companies leading this effort. The San Francisco Bay Area can only be enhanced by partnering with the Lucas Companies to build this world class facility to be housed at the Presidio.

31-1

If I can be of further assistance, please, telephone me directly.

Best regards,

Tom Atkin
Executive Director

TLA/ap



Response to Comment in Letter 31

31 - 1

Thank you for your letter. The organization's support of the Letterman Digital Center is noted for the record.



Letter 32

8-2-1999
Hand Deliver & Fax

**Cow Hollow Neighbors in Action
Marina - Cow Hollow Neighbors and Merchants
2742 Baker Street
San Francisco, California 94123
415 - 776-3191**

MM 01-2 12 3:06
PRESIDIO TRUST REC'D

Presidio Trust
34 Graham
San Francisco, California

Re : Draft SEIR for Letterman Complex

Dear Trustees :

My comments concerning the this Seir address the lack of determination in addressing the cumulative effects of the project and mitigation solving the comprehensive problems.

1. Parking and Transportation

- A. The Seir did not address the existing projected figures of the Regional Mass Transportation Study for the Golden Gate Corridor of an increase of 249% Of vehicles by 2020.] 32-1
- B. The SEIS did not address the proposed projects on the Lombard Corridor.] 32-2
- C. The SEIS did not address that the projected numbers must be readjusted because Letterman had begun to shut portions of its facility in 1989 and the base levels of vehicles were not adequate.] 32-3
- D. The SEIS did not address the Cal Trans nor the S.F. Department Of Parking and Traffic counts of 1998 for the Golden Gate Lombard Corridor as a base level for vehicular traffic.] 32-4
- E. The SEIS did not address the Tour bus and visitor automobiles For The Letterman Complex nor their mitigation for these vehicles.] 32-5
- F. The SEIS does not address the trucks and their cumulative impacts during construction of the proposed Letterman Complex .] 32-6
- G. The SEIS does not address the ingress and egress of said trucks and their impacts upon The neighbors next door. There were no mitigation for this issue.] 32-7
- H. The SEIS does not address the ingress and egress of said trucks and their potential Safety and hazardous impacts associated with the children at the YMCA Particularly with the proximity of the swimming pool and gym.] 32-8
- H. The SEIS does not address the cumulative of all of the above issues and therefore the SEIS Is deficient.] 32-9

2. Noise

- A. The SEIS does not address the factor that the Letterman Complex is in a gully with hills On two sides of it.] 32-10
- B. The SEIS does not address the echo factor and its impacts upon the immediate neighbors.] 32-11
- C. The SEIS has no mitigation for noise during construction nor after construction.] 32-12



Page 2 of Cow Hollow Neighbors in Action response to the SEIS for Letterman Complex.

- D. The SEIS does not address the noise element once the development is complete. 32-13
- E. The SEIS does not address the tour bus, delivery trucks of suppliers once the development Is completed. What are the mitigation for ingress and egress? Short term & Long term? 32-14
- F. The SEIS addresses the high noise factor existing within the neighborhood but does not Address the cumulative factor of the existing noises with the construction noises. 32-15
- G. The cumulative effects of the above noise factors were never addressed. 32-16
- 3. Water Factor
 - A. The SEIS does not address the demolition factor and its potential impact upon the Neighborhood. 32-17
 - B. The SEIS does not address the factor that the water pipes have not been used for drinking for almost twenty years because of chemicals in the pipes. 32-18
 - C. The SEIS does not address the mitigation for the protection of the underground water Levels and the impacts to the City and County of San Francisco should the chemicals in the pipes that are either above or below the ground inadvertently get into the water System during demolition or construction. 32-19
 - D. The SEIS doe not address whether the City of San Francisco or the Presidio is supplying the water supply for the Letterman complex. 32-20
 - E. There was no conclusive mitigation for sewage . 32-21

Thank You,



Patricia Vaughey



Responses to Comments in Letter 32

3 2 - 1

See the response to comment 3-6.

3 2 - 2

Committed projects on Lombard Street are considered in a revised Cumulative Analysis contained in the Final EIS (see Table 9). The analysis indicates very minor impacts and resulting traffic volumes that are lower than those used in the Draft EIS's year 2010 traffic analysis.

3 2 - 3

The projected traffic volumes were those developed in the GMPA, and are based on the mix of land uses that are expected to be in the Presidio in the year 2010. For the turning movements that do not enter or exit the Presidio gates, the turning movement volume was assumed to increase at an annual rate of 1 percent from the existing counts made in January 1999. Therefore, 1999 volumes were used as a base, not 1989 volumes.

3 2 - 4

The San Francisco Department of Parking and Traffic is not aware of any comprehensive traffic counts in the Golden Gate/Lombard Corridor in 1998. The San Francisco Department of Parking and Traffic periodically conducts traffic counts at various locations throughout the city as the department determines traffic counts are warranted. Thus, the traffic counts conducted in 1999 for the purposes of this EIS provide the most recent and appropriate traffic counts.

3 2 - 5

The trips estimated for the Letterman Complex are comprised of both employee and visitor trips. Since it is planned primarily for office uses, tour buses would not be destined for the complex. If and when they do need to stop at the complex, they would enter through either the Lombard Street Gate or the proposed new intersection on Richardson Avenue. Based on city ordinances, tour buses are unable to enter via either Gorgas Avenue or Marina Boulevard gates.

3 2 - 6

The contribution of construction-related truck traffic to cumulative impacts would not be significant due to the short-term nature of construction activities. The impacts of construction traffic on the local and regional transportation system are discussed in Sections 4.1.7.7 through 4.6.7.7 (Construction Impacts) and would be mitigated through implementing mitigation measure TR-5, *Construction Traffic Management Plan*. It is highly unlikely that construction at the 23-acre site would overlap with the two major construction projects in the vicinity, Crissy Field restoration and the reconstruction of Doyle Drive, for the following reasons:

- Major site construction of Crissy Field is anticipated to be completed by mid- to late-year 2000, and therefore would not overlap with demolition or construction activities within the Letterman Complex, which would not start before that date.
- Planning and design effort for Doyle Drive will require a minimum of four years. Therefore, construction activities within the Letterman Complex would be completed prior to construction of Doyle Drive.



Planning for the renovation of the Exploratorium is currently underway, and construction is anticipated to begin in mid-2001 and be completed by the end of 2002. A portion of the Exploratorium construction activities, as currently planned, may overlap with those for Alternatives 3, 4, and 5. In response to the comment, mitigation measure TR-5, *Construction Traffic Management Plan* has been revised to include coordination of construction activities between the various nearby projects to minimize temporary transportation impacts.

3 2 - 7

See the response to comment 6-2.

3 2 - 8

The construction traffic management plan required under mitigation measure TR-5, *Construction Traffic Management Plan* would minimize impacts to visitor safety, including users of the YMCA.

3 2 - 9

The EIS does address impacts to which the commenter refers (see responses to comments 32-1 through 32-8). The traffic volumes analyzed are appropriate for both existing and cumulative (year 2010) conditions. Any temporary construction-related traffic would be subject to mitigation measure TR-5, *Construction Traffic Management Plan*.

3 2 - 1 0

The sloping terrain of the Letterman Complex and the upward grades to the southwest and west could reflect noise generated at the project site outward (to the northeast and east). Reflected noise or noise caused by echoes is not considered in the analysis because the impacts of reflected noise would be substantially less intense than the impacts experienced by the noise-sensitive sensitive receptors located along the shortest, most direct path of noise travel. Since the travel of noise follows primarily linear paths, terrain-reflected noise would tend to travel upward and outward over the Marina District. As reflected noise travels back toward the neighborhoods, it would tend to be masked by foreground noise. Reflections or echoes could be occasionally noticed by neighbors, but these noises would be indirect and attenuated with the additional distance traveled. The slopes that would provide reflection around the Letterman Complex are not steep walls, and they are made of acoustically “soft” surfaces, meaning they are vegetated with trees and grasses and are not densely built up. These factors would serve to diminish the intensity of reflected noise to a level that does not require further analysis. The noise analysis instead focuses on the effects of noise traveling along the shortest, most direct path to the nearby receptors, including the residences located along Lyon Street, which face the site. Direct impacts at these nearest neighbors are characterized in Sections 4.1.10 through 4.5.10 of the EIS.

3 2 - 1 1

The effect of echoes on immediate neighbors is discussed in response to comment 32-10.

3 2 - 1 2

As discussed in Section 4 of the EIS, noise during demolition and construction would be reduced by mitigation measure NO-1, *Reduction of Construction Noise*. Traffic noise and noise from stationary sources expected with Alternatives 1 through 5 after construction would not cause significant impacts. No significant noise impacts would occur with Alternative 6. Therefore, no further mitigation would be required.



32 - 13

The comment is unclear. If the commentor is referring to noise impacts of the development following construction, the operational noise impacts for each alternative are analyzed according to the thresholds in Section 4.1.10 of the EIS. The effects of noise generated after completing construction are then discussed for each alternative in Sections 4.1.10.2 through 4.5.10.2 (Long-Term Traffic Noise Increases) and 4.1.10.3 through 4.5.10.3 (Long-Term Stationary Source Noise Impacts). These two impact topics consider the sources of noise that would operate following construction of the alternatives.

32 - 14

The traffic noise impacts analyzed in the Draft EIS account for all vehicle trips to and from the site (including ingress and egress). The noise contributions of heavy-duty trucks, buses, medium-duty trucks, and automobiles is considered and aggregated in the impact evaluation. The noise analysis assumes that the composition of new traffic caused by the development alternatives mimics the composition of the traffic present in the existing conditions. This means that the occurrence of all types of vehicles is assumed to increase proportionally with the expected increase of overall vehicle trips. This assumption is conservative for the proposed development alternatives because the new traffic would most likely include a lower percentage of heavy-duty trucks and buses and a higher percentage of automobiles than currently exist. Implementation of mitigation measures for transportation, including mitigation measures TR-1, *Lyon Street/Richardson Avenue/Gorgas Avenue Intersection Improvements*, and TR-5, *Construction Traffic Management Plan*, would route ingress and egress traffic during operation and construction phases, respectively, away from noise-sensitive receptors in the nearby neighborhood. Because the noise analysis considers the influence and the routing of the vehicles, and no significant impacts were identified, no noise mitigation measures would be required. See also the response to comment 32-13.

32 - 15

Construction noise impacts are analyzed according to the thresholds in Section 4.1.10 of the EIS. These thresholds are applied to the instantaneous equivalent noise levels (L_{eq}) that could be caused by the construction activities. The threshold of 80 dBA L_{eq} is used to determine significance of any daytime construction noise regardless of noise levels existing without the construction activity, and the threshold of a 5-dBA increase is used to determine the significance of nighttime noise over conditions existing without the construction activity. Because mitigation measure NO-1, *Reduction of Construction Noise*, would address these impacts, the effect of adding construction noise to the existing noise environment is addressed.

32 - 16

The effects of noise reflections are discussed in response to comment 32-10. Because noise levels are measured on a logarithmic scale, low-energy reflected noise would not cause substantial contributions to the noise levels analyzed in the EIS (which includes the effects of heavy-duty trucks, buses, as well as other operation and construction noise). In response to the comment, new text has been added to Sections 4.1.11.8 through 4.6.11.8 (Noise) in the Final EIS to address cumulative impacts of the proposed development in combination with other reasonably foreseeable future projects. As discussed, cumulative impacts of demolition/construction noise would not be significant, and cumulative impacts of long-term traffic and stationary source noise would not be significant.



3 2 - 1 7

The Presidio Trust is unaware of any neighborhood impact on water that would occur during demolition. The short-term noise impact on adjacent neighborhoods due to demolition is discussed in Sections 4.2.10.1 through 4.5.10.1 (Short-Term Demolition/Construction Noise Impacts) of the Final EIS.

3 2 - 1 8

The water pipes do not pose a risk to human health, safety, and the environment. The Army previously evaluated the hazard of mercury vapor in the LAIR's laboratory sinks (U.S. Army 1993b as referenced in Section 6 in the Final EIS). The evaluation focused on 19 laboratories and rooms where there was potential for mercury contamination to occur in sinks and drains. The assessment found that 5 of the 19 rooms contained recoverable mercury from <0.1 grams to 19.26 grams. Total mercury found and removed during the sampling event was 20.58773 grams. The Presidio Trust has contracted FOSS Environmental and Infrastructure to collect, inventory and dispose of hazardous waste/materials remaining in the Letterman Complex. Even though the data suggest that traps do not pose a chemical threat, the Trust has directed FOSS to remove all traps located in laboratories. The traps will be staged, profiled and disposed of in a proper manner to eliminate the potential of a chemical release.

3 2 - 1 9

See response to comment 32-18. In addition, mitigation measure HH-3, *Contingency Plan* would ensure that corrective measures to protect groundwater and soil would be implemented immediately if contamination is discovered or observed.

3 2 - 2 0

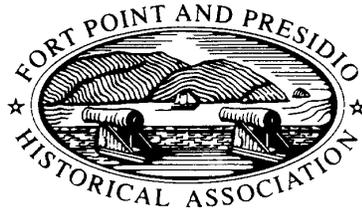
The text in Section 3.5 has been revised to indicate that the Presidio Trust would supply water to Presidio users, including those located within the Letterman Complex. Refer to master response 13.

3 2 - 2 1

Refer to master response 14.



Letter 33



PRESIDIO TRUST REC'D
JUL 23 1999

30 July 1999

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

Attention: Letterman Complex
Re: Draft EIS Comments

PRESIDIO TRUST REC'D
JUL 23 1999
29

Dear Sir or Madam:

We have reviewed the Draft EIS and have the following concerns. We have focused on our own areas of expertise and interest, which are conservation of existing archaeological and historic sites and appropriateness of the new design to the historic district of the Presidio, and its history and archaeology.

Appropriateness of the Design:

Permitted Area of Construction: The GMPA mentions Letterman as an 800,000 s.f. complex, which was presumably based on the 1989 uses in the GMPA database. On page iii, the summary identifies 807,000 s.f. in the combined LAMC and LAIR. The source of the additional 93,000-to-100,000 s.f. which has been permitted under the proposed 900,000 s.f. development must be documented. The added space on this site, beyond what is there now, requires justification or should be removed from the program.

33-1

Site Planning: The location of this massive corporate project just within the main entrance to a national park seems visually to contradict the mission of the Presidio. Since the proposed tenant is *not* consistent with the GNP, the design alternatives should include alternative locations more consistent with the goals of Lucas *and* the National Park. Ideal site criteria for Lucas might include: a less public location, more seclusion, better access to Marin County, etc. Failing that, a location on the 23 acres that minimizes the building's impact is most desirable. Creating of an "enclave" should be resisted by the Trust. The Lucas plan does little to provide public access to the site. Although the "Great Lawn" is accessible to the public, access is obscured by the bulk of the three large structures on the south edge of the site. The "Great Lawn" is likely to function as a private lawn.

33-2

Site Circulation: The project is too impermeable to pedestrian and bicycle traffic. It creates a long barrier to pedestrian movement from east to west for the entire length of O'Reilly Avenue, forcing a long detour to the south or north to get around it. If the complex's main interior north-south circulation between wings could occur *above* the ground floor, it might be possible to create passages for pedestrian or bicycle traffic under or through this barrier without loss of privacy or security to the building users. Or, if the site slope is sufficient, passages through "Building 1" could be provided as the slope permits.

33-3

Open Space: The giant lawn to the east, which is doubtless pleasing to the adjacent residential neighborhood, forces the new buildings too close to the historic housing on

33-4

Page 1

P.O. Box 29163 • Presidio of San Francisco, California 94129 • 415.921.8193



O'Reilly Avenue. In this respect, the proposal does not meet the planning guidelines prepared by SMWM which calls for retaining the historic "O'Reilly Commons", an existing green space. Even if the green space were not historic, the historic houses across from it require the space as a buffer along the west side of the giant "Building One."

33-4

Bulk: Some, but not all of the problems of this design are due to its density. The original building that it replaces was also too dense to be appropriate on this site. Reducing the project's apparent bulk by whatever measures are available is essential. That might include one or all of the following strategies:

- Restrict the volume of the new construction to just the amount demolished, per the GMPA.
- Locate as much of the volume as will fit comfortably into open areas in the balance of the Letterman site, on the footprints of missing buildings from the older hospital.
- Move some of the square footage elsewhere either within the Presidio or not.
- Require the developer to put more underground. Putting more of the structure under ground would make the scale of this project more in keeping with the historic district. Those functions which do not require windows, or would benefit from a constant temperature, or a very secure environment might work well below grade. If the bulk of the building can be reduced by one story, it would also help to make it more compatible with the historic district.

33-5

Massing: Ways could be found to manipulate the massing to reduce the apparent size of the complex, and allow it be more a part of the Presidio, and less of an enclave unto itself. The existing design is difficult to critique in detail owing to lack of information. A site section would be helpful. However, some conceptual suggestions, based on the site plan on page 32, follow:

- The tallest blocks of the proposed design (the highest and most dominant elements) are oriented east and west, and will cast shadows over the courtyards inside the complex, as shown in plan. If the structures were generally lower, it would lose less sun, and the initial impact of the structure could be lessened from the Presidio gate. The problem of west sun should not be so severe in this location, due to the prevailing fog patterns.
- The building's uphill portions should be shorter than the down hill portions, again reducing the mass from the Presidio Gate. The Gorgas facade could afford to be taller, due to the industrial scale which prevails in that area, at the lowest part of the site.
- The use of closed courtyards, not open to the public on any side, makes it nearly impossible for the mass of the buildings to read as narrow elements (per the Draft Planning Guidelines). Instead they read as a series of giant boxes. Opening the courtyards to the public, would help relieve the mass, and would be in the spirit of access which characterizes a National Park.
- Location of Buildings Two and Three closer to the bottom of the site (on Gorgas) would create a "Great Lawn" which serves the Presidio itself, rather than only Lucas and the Marina. Shared roof top recreation space for Lucas staff would permit everyone to enjoy the view.

33-6

Existing Recreational Facilities and Community Services:

Letterman now includes some tennis courts. Consideration should be given to preserving them, for public use, as outlined in the GMPA, and the facilities which appear to replace them (labeled F on page 32) could be relocated elsewhere. Or the tennis courts could be relocated elsewhere, at the expense of the developer.

33-7



The GMPA mentions the auditorium at Letterman, the loss of which should be mitigated by providing a similar public accommodation in the new project. That theater is relatively separate from the complexes to be demolished and is close to the housing on O'Reilly. If the new complex were pulled back from O'Reilly Avenue (as would be appropriate to the Draft Planning Guidelines), the existing theater could be retained.

33-8

Cultural Landscape:

Development on this site has the potential to transform the first impression of the Presidio, for good or ill. The potentially character defining role of the landscaping, (and the new buildings), should be carefully considered in the context of the whole. Landmark quality existing historic landscaping features, such as O'Reilly Green, need to be retained. The new landscape needs to be compatible with the adjacent landscaped areas, and it should not set off this 23 acre portion of the Letterman site from the rest of the Letterman site, or from the rest of the Presidio, regardless of its tenant's functional needs. The project needs to reflect the cultural landscape, and restore those historic elements which can be identified. At the same time, new landscaping needs to help screen the mass of this enormous project.

33-9

History:

We find the EIS deficient in its treatment of the history of the site:

1. It ought to mention, in the Summary and in Section 3.1, the fact that the Presidio is a National Historic District. This information may be assumed, and it is implicit in much of the comparisons of alternatives, but it appears to be mentioned only in Appendix B, SMWM's Draft Planning Guidelines. The treatment of history in the body of the report is confined to brief references in the Summary (Page iii), and four sentences on page 51. One infers that the site is considered historic, and one learns that it *must* comply with the National Historic Preservation Act, but not *why*. It is perhaps elliptical because it is a "supplement" to the GMPA, but still, that information should be available to a reader who has not seen the original document.

33-10

2. The future tenants should be brought into the team which is responsible for the interpretation of history of the site. That role should be identified in the EIS. Their presence in the Presidio demands that they display some appreciation for the privilege of being there, and that they contribute to the public understanding of the history of this important site.

33-11

3. The significance of the history of this site deserves effective historical interpretation, somewhere on the site, and available to the public. The Draft Planning Guidelines mention Building 558 as one possible site for some kind of museum or visitor center. It has been there since 1920 and served as a Post exchange, restaurant and terminus for the electric streetcar line that served the Presidio until 1945. Some appropriate public use should be made of this in the new plan, and its proximity to the main public axis makes an interpretive use logical. If this building is within the site, the developer should be responsible for developing it, in conjunction with NPS and Trush staff.

33-12

Archaeology:

1. The GMPA specifically mentions the danger of new construction to archaeological remains at the site. It recommends avoiding them "through design." Before that can happen, and *before the design is completed*, such remains should be located and mitigation measures be taken, and the design should take them into account. It is important to note also that a programmatic agreement for the treatment of cultural

33-13



resources, both prehistoric and historic, has been signed by all parties at the Presidio. The agreement clearly spells out the process to be carried out, and should be applied to the Letterman project because of the potentially very complex archaeology. The agreement calls for pre-construction archival research and for the sub-surface of the area to archaeologically tested for resources well before construction begins to prevent construction delays. *We recommend that this testing be carried out before the design is final* so it may inform the location of proposed new structures. At least six months should be allowed prior to construction to carry out archival research, subsurface testing, and the preparation of a written report. The Crissy field project is an excellent example of how construction can be delayed because neither pre-design nor pre-construction archival and physical testing for resources were made part of the planning process.

33-13

Specific problems with the section dealing with archaeology follow:

2. "Section 2.6.7 Archaeology" is either too abbreviated, or is partly missing. It is out of balance. It treats monitoring exhaustively, but barely mentions the earlier stages of sound archaeological procedures. The EIS should require pre-design testing instead of pre-construction testing. Testing language should be more definite (shall be or will be rather than "would be"). There should be a fuller treatment of standard archeological procedure and protocol involving research and testing, prior to the monitoring phase. The standard procedures listed should, at a minimum, include the following:
 - a) Perform an archival study to assemble what data there is on the site's history, both historic and pre-historic.
 - b) Perform a "phase 1 archaeological study" to observe any surface archaeological evidence.
 - c) Perform a "phase 2 archaeological study" to systematically study the subsurface (test augering or backhoe testing, followed by hand excavation if indicated).
 - d) Perform advance mitigation, especially of pre-historic remains which will require work with native American groups. This will probably be indicated, whether or not portions of the site have been previously disturbed,.
3. During construction, appropriate monitoring procedures should be followed; either full time monitoring or spot checks, depending on the results of the earlier studies.
4. Paragraph 5 appears to be out of sequence, because it applies earlier in the process. This paragraph should also contain the policy that sensitive areas that *have* been previously disturbed could well deserve archaeological excavation.
5. The GMPA mentions (page 101) a "an "archeological resources management plan" as being "underway to guide future management," presumably as of 1995, the date of the Final GMPA. The status of that plan should be determined, (we have never seen it) and if it exists, reference should be made to its findings as they apply to this site.

33-14

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33-17

Any conceptual plan by the Lucas group or other organization should be submitted to the NPS archaeologist, Leo Barker, for review as soon as it is developed. Time is very important because of the complexity of archaeology in the Letterman area, and the length of time that will be needed to carry out pre-construction research and subsurface testing.

33-18

Long Range Planning and Economic Justification:

The EIS document (and all future EIS's) should include updated information on the economic justification for the project in the context of the Trust's overall master plan and over all financial obligations, showing progress to date towards their goal of financial

33-19



independence. Evaluation of any proposal is made much more difficult without an up-to-date understanding of its planning and economic context. A working economic model should be available to the Public (we assume it is already in use by the Trust). 33-19

We look forward to hearing more about this important project as it progresses.

Sincerely,


Lucia Bogatay, AIA & Lawrence W. Desmond, Phd.
Co-Chairs of the Architecture & Archaeology Committee
Fort Point and Presidio Historical Association

cc: Redmond Kernan
Brian O'Neill
Courtney Damkroger, National Trust for Historic Preservation
Donald Andreini, Heritage
Stead Craigo, State Office of Historic Preservation

Responses to Comments in Letter 33

3 3 - 1

The GMPA and EIS identified additional buildings within the Letterman Complex that could be demolished and an equivalent amount of square footage constructed within the 60-acre area. Since the GMPA's adoption in 1994, several of these smaller-scaled buildings have been demolished. Additional buildings to be demolished are identified in Appendix C of the EIS. Please see master response 11.

3 3 - 2

Alternative locations for the project are adequately discussed in Section 2.2.1, Alternative Sites within the EIS. The 23-acre site was the most well-suited location for the proposed project. See Section 1.2.2 of the Final EIS. The Presidio Trust disagrees with the commentor's assertion that the proposed tenant of Alternative 5 is not consistent with the GMPA. As discussed in Section 4.5.1, Consistency with Approved Plans and Policies, with the exception of Alternative 1, the preferred alternative is most consistent with the GMPA for reasons given in the text (see master response 2A). The 7-acre Great Lawn or public park would further the GMPA's general objective to increase open space and the GMPA's specific goal to provide for safe and enjoyable recreational use of the Presidio. Implementation of the Planning and Design Guidelines through the site planning and design development phases would ensure that the locations of the proposed buildings would minimize impacts on recreational use of the public park and public access. These Planning and Design Guidelines include parameters for height and bulk of building masses, as well as for public access. Please refer to master responses 23 and 25 with regard to circulation and public access. Please refer to master responses 7A and 7B concerning Planning and Design Guidelines and design review.

3 3 - 3

The preferred alternative would be modified through the planning and design review process to more fully comply with the Planning Guidelines. Conformance with the Planning Guidelines' principles for public access, land use as well as access, circulation and parking would be addressed at that time. Please refer to master responses 7A, 7B, and 25. The Great Lawn would be accessible from the south through two passages, between the buildings, as well as at the north edge of the site from the east at Chestnut Street.

3 3 - 4

Please refer to master response 23 with regard to the preferred alternative's effects on the historic setting and O'Reilly Avenue. The Final Planning Guidelines include goals and design objectives for preserving the O'Reilly Commons. Additional text has been added to the Planning Guidelines to better define the desired width of the O'Reilly Commons, and additional text has been added to the Final EIS to reflect those inconsistencies with the Planning Guidelines that constitute an adverse effect. In the preferred alternative, the Great Lawn would serve as an additional open space to that of the O'Reilly Commons.

3 3 - 5

The comment is noted. Implementation of measures affecting building form, as described within the Planning Guidelines, would provide a comparable lessening of the effect on the historic district while reducing the project's apparent bulk. Alternative 1 within the EIS considers replacement construction of up to 503,000 square feet throughout the 60-acre Letterman Complex. Please refer to master response 11 with regard to the

derivation of the proposed building area and square footage. Please refer to Section 2.2, Alternatives Considered but Rejected, for discussion on locating the replacement construction elsewhere within the Presidio (also, refer to master response 10A). The suggestion to consider locating more of the new construction underground could be considered in the design development phase as a means to reduce any adverse effects on adjacent historic structures and streetscapes caused through height and massing of the new construction.

3 3 - 6

Site sections of the preferred alternative have not been provided in the Final EIS, but would be included in future planning and design reviews, with opportunities for public input at the conceptual design stage. Responses to the bulleted remarks follow:

First Bullet – The tallest blocks of the buildings, which are bar-shaped, would be oriented east/west. The benefit of this orientation is that along O’Reilly Avenue, the narrowest section of the tall building block would face the commons and therefore the potential for shadow-casting would be minimized. The four-story gable ends of the buildings would alternate with three-story connection pieces, creating some modulation in the building elevation facing O’Reilly Avenue.

Second Bullet – New buildings which directly face Gorgas Avenue would be lower in height than in other areas of the site, to be compatible with the one- and two-story buildings along Gorgas Avenue. Elsewhere in the 23-acre parcel, a 60-foot height limit in conjunction with buffers and setbacks would prevent the new construction from towering above its adjacent neighbors. An open space “foreground” along Letterman Drive would serve as a visual buffer for adjacent new construction at 60 feet. Please refer to the Building Form section of the Planning Guidelines for additional information and graphic diagrams.

Third Bullet – Design of the buildings would be developed so that they do not read as “giant boxes.” The concept for this design is a series of parallel bars linked by connecting buildings. This idea would be further developed to avoid monolithic massing. Public access to the courtyards would be explored in subsequent site planning and design of the preferred alternative (see mitigation measure CR-1, *Planning and Design Guidelines*). Creating courtyard buildings, however, is consistent with the Planning Guidelines recommendation for “buildings clustered around courtyards and intimate outdoor spaces” (Appendix B, 3.5.2D within the Final EIS).

Fourth Bullet – The commentor’s suggestion of locating Buildings 2 and 3 on Gorgas Avenue would be incompatible with the adjacent one- and two-story industrial buildings which presently define the historic character of Gorgas Avenue. However, it is duly noted that the Great Lawn should serve all Presidio visitors and tenants. Efforts would be made during subsequent stages of the design to improve public access and increase visual access into this large open space.

3 3 - 7

The tennis court, structure 1147, would be relocated elsewhere within the Letterman Complex or Presidio. The effects of this action are analyzed in Section W, Recreation in Appendix A.



3 3 - 8

The GMPA concept of retaining the LAMC auditorium was coupled with the idea of retaining LAIR. The preferred alternative is based on the idea that both LAMC and LAIR will be removed and an integrated, carefully designed complex would be developed for the 23-acre site which is more compatible with the historic Letterman setting than what currently exists. Under this scenario, the Trust considers that the existing auditorium is incompatible with the historic setting of the Letterman Complex and attempting to integrate it into a new design for the site could prove to be quite difficult. Also, it is very close to the historic structures on O'Reilly Avenue, making the realization of an O'Reilly Common very difficult. The auditorium has never served as a public amenity, so its loss to the public would be negligible. Please see master response 25 for a discussion of visitor experience and public access.

3 3 - 9

Comment noted. Implementation of the Planning Guidelines and later Design Guidelines would ensure that the new development would be in keeping with the character of the historic district, which would include elements of the cultural landscape. Please refer to master responses 17, 23 and 24 with regard to discussion of the cultural landscape and visual screening.

3 3 - 1 0

In response to the comment, text has been added at Sections 1.4 and 1.1 of the Final EIS discussing the Presidio's status as a National Historic Landmark district and the implementation of the NHPA mandate. The commentor is referred to Section 3.1, The Presidio, and Section 3.10.1, National Historic Landmark District that identify the Presidio as a National Historic Landmark district. It should be noted that the history of the Presidio and the site are important topics in the EIS. The Index identifies such key words as "historic hospital complex," "national historic landmark," "National Historic Preservation" and "cultural resources" as appearing more than 50 times throughout the text.

3 3 - 1 1

The Trust concurs with this comment. As discussed in Section V, Interpretation and Education within Appendix A of the EIS, future tenants would be required to include programs that acquaint visitors with history, culture and the arts, cross-cultural and international understanding, community renewal, and/or environmental stewardship and sustainability. These programs would benefit the Presidio, the participants, and the organizations and communities they represent. These enhancements for achieving Presidio goals would have beneficial impacts on visitor interpretation and education. Furthermore, text has been added to Sections 2.3.3 through 2.8.3 (Activities and Programs) to address this comment. Refer to master response 25.

3 3 - 1 2

Building 558 has been rehabilitated by the Presidio Trust to house the residential leasing office as well as an un-staffed visitor information station. In addition, a wayfinding/information kiosk would be constructed near the building to further guide visitors through the Letterman Complex.

3 3 - 1 3

The commentors reference the 1994 Programmatic Agreement for the Presidio and that document's provisions for archeological analysis. A final Programmatic Agreement for the Deconstruction, New Construction, and



the Execution of Associated Leases at the Letterman Complex has been developed by the Trust and is attached to the Final EIS in Appendix F. This new Programmatic Agreement includes an Archeological Monitoring Assessment and Monitoring Program (AMA and Monitoring Program) developed for Letterman, which is found in Appendix A of the Letterman Programmatic Agreement. The provisions of the Letterman Programmatic Agreement supercede the previous 1994 Programmatic Agreement.

Under the AMA and Monitoring Program all planned undertakings will be reviewed by a qualified archeologist prior to final design. The initial AMA for the 60-acre site has been conducted; four archeologically sensitive zones were identified. The Trust agrees that there is a need to factor in archeological issues in the preliminary phases of design.

3 3 - 1 4

The referenced Section 2.6.7 has been rewritten for the Final EIS, and moved to Section 4, Archeological Properties, as mitigation measure AR-1, *Archeological Management Assessment and Monitoring Program*. In addition, as noted in the response to comment 33-13 above, Appendix F of the Final EIS, contains the Programmatic Agreement which contains the AMA and Monitoring Program for the Letterman Complex. The AMA would examine the existing archeological inventory and predicted sensitivity zones in the Area of Potential Effect for the undertaking. Additional studies separate from monitoring would be recommended in the AMA. The AMA would include: a) archival study to assemble historic and pre-historic data; b) ground probing for surface and sub-surface archeological evidence; c) test augering or excavations as needed; and d) compliance with all provisions of the Native American Graves Protection and Repatriation Act (NAGPRA) and the Archeological Resources Protection Act (ARPA).

3 3 - 1 5

Appropriate monitoring procedures would be followed as per the Programmatic Agreement in Appendix F of the Final EIS.

3 3 - 1 6

To the extent that areas have been previously disturbed, the Presidio Trust would consult with the SHPO on appropriate methodologies. Archeological excavation rather than preservation *in situ* may not be appropriate.

3 3 - 1 7

The archeological resources management plan mentioned on page 101 of the GMPA was never completed by the NPS. Thus, there were never any findings related to this site. Portions of it, most notably the CAD maps of sites, have been incorporated in the archeological research completed for the development and execution of the Programmatic Agreement in Appendix F of the Final EIS.

3 3 - 1 8

The Trust agrees that there is a need to factor in archeological issues in the preliminary phases. To this end, archeological concerns were discussed with the project proponents at the earliest planning stages for the Letterman project. Information provided to the proponents included an archeological sensitivity map prepared



by Leo Barker. The design of the preferred alternative allows the project to avoid known archeologically sensitive areas in the vicinity of PAS-2 and PAF-30.

The Archeological Management Assessment Program described in Appendix A to the Programmatic Agreement states that all planned undertakings would be reviewed by a qualified archeologist prior to final design. The archeologist would prepare an AMA report or documentation to examine existing inventory and predicted sensitivity zones. Comments from the archeologist would include recommendations for additional actions to clarify or ensure resource identification and protection, and proposed methods of monitoring. Additional studies separate from monitoring may be recommended in the AMA, including, where appropriate, ground probing, historic research, or test excavations. Such studies might ultimately result in redesign of the project if necessary to protect archeological resources.

33 - 19

Please refer to the FMP in Appendix E of the Final EIS, and to master response 10A. Refer also to Section 1.2 of the Final EIS and master response 4A.



Letter 34

business working
for a better future

**NORTH BAY
COUNCIL**

PRESIDIO TRUST REC'D

~~1999 JUL 23 4 10 49~~

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1999 JUL 23 12:39

July 30, 1999

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

To Whom It May Concern:

I am writing on behalf of the North Bay Council, a coalition of businesses in Marin and Sonoma Counties, in support of the Presidio Trust's selection of the Letterman Digital Center. I have worked with the Lucas companies for several years, and I know first hand that they share the Presidio's commitment to education, research, community service and innovation.

The Presidio should be a place where the quality of the ideas produced by those who live and work there help shape the future. With the Letterman Digital Center, the Presidio will be known as much for what goes on within its boundaries as for the beauty of its location.

The Letterman Digital Center is the type of investment the Bay Area needs to take advantage of the new digital age. By bringing together skilled technicians, artists and engineers, the Letterman Digital Center will become a hub of the revolution in digital imaging. It will attract other companies and organizations, who want to be at the heart of the digital revolution.

The Lucas companies have a long history as pioneers in the digital industry. They have developed products and services that impact our lives daily. The technology developed by the Lucas companies has not only changed the way we watch and hear movies but how we see and listen to our world.

34-1



The Letterman Digital Center will help give the Presidio an identity as a place where new, and innovative ideas are created. The Presidio Trust has made an excellent choice in the Letterman Digital Center.

34-1

Sincerely,



Mary Jaeger
Executive Director

Response to Comment in Letter 34

3 4 - 1

Thank you for your letter. The organization's support of the Letterman Digital Center is noted for the record.



Letter 35



PRESIDIO TRUST REC'D

JUL 21 10:50 AM '99

NEPA Compliance Coordinator
The Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco CA 94129-0052

21 July 1999

Dear NEPA Compliance Coordinator of The Presidio Trust,

Letter for the Record, Submitted as part of the
Draft Environmental Impact Statement and Planning Guidelines
For New Development and Uses Within the Letterman Complex

Environmental Opportunities for Alternative 5: Digital Arts Center

Since its inception in 1991, Green Development Services (GDS) has worked with organizations worldwide to integrate energy-efficient and environmentally responsive design into a variety of building projects. Green Development consulting projects include new towns, building renovations, a bug zoo, Wal-Mart's Eco-mart, the Sydney 2000 Olympic Village, Monsanto's Corporate Headquarters, Greening the White House, and the Pentagon Renovation. In October 1995 and July 1996, GDS participated in a charrette on the development of green building strategies to support the conversion of the Presidio from an Army base into a profitable National Park. GDS staff also provided research and editorial assistance on the charrette report.

We believe that developing at the Presidio is a unique environmental opportunity. Just as the adjoining Thoreau Center for Sustainability has set a standard for environmentally responsive renovation, the redevelopment of the Letterman site into a Digital Arts Center, the Letterman Digital Center will set the precedent for new construction on the Presidio. And, we believe that due to the visibility of this project, the Letterman Digital Center will have national significance for the green building movement.

Environmentally responsive development significantly improves the comfort, aesthetics, resource efficiency, and value of properties while reducing pollution and saving money. More than 30% of America's total energy usage, 60% of its electricity and its financial resources, and 26% of the contents of its landfills are linked to buildings. Moreover, 80% of the average American's time is spent inside. Thus, enhancing the energy efficiency and livability of buildings through better design is a powerful way to restore the environment and improve quality of life while saving money.

35-1

We would now like to comment on several areas of Sustainable design that Alternative 5 the Letterman Digital Center addresses:

- Environmentally responsible construction;
- Integration of sustainable design principles;
- Energy management; and
- Sustainable building operation practices.
- Stormwater
- Water supply
- Landscape and habitat

Each of these are discussed below.

The Letterman Digital Center buildings are designed for longevity, an elemental component of sustainability. The concrete structures and tile roofs should last as long as older Presidio buildings have.



Building structure, arrangement and interior systems provide sufficient flexibility to allow reconfiguration in a variety of ways as changing uses may demand. Lighting and ventilation systems are simple, flexible and reliable. The Letterman Digital Center team is familiar with and is considering life cycle and environmental costing implications in every design decision. We project an effective life of 100 years.

The Letterman Digital Center Team includes world class environmental technical experts on integrating issues such as site design, building design, energy and water efficiency, resource-efficient construction, lighting design, and building ecology. Environmental and energy efficiency considerations influence siting, shell design, glazing selection, daylighting, lighting systems, HVAC, and the choice of office equipment. The range of available options, refined to address the Digital Center's requirements, will yield an attractive, functional, energy-efficient, cost-effective, environmentally responsible and durable design.

ENVIRONMENTALLY RESPONSIBLE CONSTRUCTION

On the construction side of the project, our team will implement an environmental construction management plan to ensure environmentally responsible practices during construction. This plan will focus on and contain requirements for minimizing noise, traffic, dirt and other impacts to the surrounding neighborhood, minimizing habitat and erosion impact on the site during construction, decreasing land-filled materials, tracking green material and indoor air quality specifications, and protecting workers from exposure to harmful materials.

INTEGRATION OF SUSTAINABLE DESIGN PRINCIPLES

The best way to ensure the integration of sustainable design principles is to use the US Green Building Council's LEED rating system as a sustainable design guideline for the project. LEED is a comprehensive tool that addresses all environmental topics most relevant to new construction, and covers energy issues extensively. Rocky Mountain Institute's Green Development Services was involved in founding the US Green Building Council, we serve on the Board of Directors, and helped create LEED. Members of the team have already used LEED in several projects and are intimate with its application.

35-1

The Letterman Digital Center Team considers LEED a "design to" standard, and intends to use it as a frame of reference throughout the design process. Given the nature of the buildings and the site, the team is hopeful that it can achieve a Platinum level. We are confident we can achieve a Gold rating level, which requires an exceptionally high performance level.

SUSTAINABLE BUILDING OPERATION PRACTICES.

Sustainable building operation practices include monitoring various aspects of building operations, operating recycling systems, maintaining operational energy and water efficiency, maintaining indoor air quality, numerous aspects of cleaning/maintenance procedures, ensuring renovations are carefully done, using environmentally friendly landscape maintenance procedures, resolving tenant complaints, documenting successful operational tools, and training and qualifying people to pass on the knowledge. The Digital Center team will design an Operations and Maintenance Plan covering each of these issues in depth, and prepare an Owner's Manual to describe the proper operation of the Center. In addition, each occupant will receive a pamphlet describing how to care for the buildings, and how to make the buildings work for them.

Building operations and maintenance significantly impact the internal and external building environment. The initial work of the design team is a small fraction of the total requirements over the life of the Center. Efforts to make the Center environmentally responsible must be continued and enhanced by the occupants. Lucasfilm maintains exceptionally high operational standards in all its facilities. The buildings will be designed for low maintenance and will limit use of toxic containing materials to a minimum.

Operational practices will also include considerations of use patterns and interactions with the surrounding neighborhoods. A minimal parking requirement will result from an extensive ridesharing program such as is currently in operation at the Skywalker Ranch facility in Marin County. This program offers assistance



and incentives for forming car pools and provides taxi rides home if an employee has to work late or has an emergency requiring early work departure.

ENERGY MANAGEMENT

The combination of the Presidio’s microclimate with the strategy of a campus-like design, makes it fairly straightforward to produce very comfortable and highly efficient structures. Overall, we project the Center’s energy use to be more efficient than allowed by California’s Title 24. Daylighting and natural ventilation are extremely efficient forms of renewable energy.

The Energy Management strategies for the Letterman Digital Center rely on two simple interrelated principles. First, reduce the demand for energy through thoughtful, integrated systems design; and then second, efficiently supply the remaining energy required to provide a healthy, comfortable, and enjoyable work environment. Any technology or system chosen should enhance the comfort and performance for the buildings and occupants.

Reduced Energy Demand

The Letterman Digital Center Team’s design reduces energy demand by maximizing the buildings’ ability to rely primarily on daylight and natural ventilation. Both the form and orientation of the proposed buildings contribute to reducing the Center’s energy demand. The buildings have relatively narrow floorplates with multiple floors that are well oriented for optimal solar access. Sheltered courtyards protect adjacent buildings from temperature extremes. Building enclosures or envelopes will be thermally optimized by highly efficient glazing, sealing and insulation.

• **Daylighting**

Effective daylighting is simple and elegant. Well-designed daylighting reduces energy demand by offsetting the need for electric light. The system has direct and indirect benefits.

35-1

Designing narrow buildings where most of the usable space is within 30 feet of windows maximizes this benefit. An additional plus is the Digital Center’s unique mix between folks who need dark work space and others who appreciate the daylight. Circulation, meeting space, and some work areas can be put on the daylight perimeter, and dark spaces located in the core. The zone of the building where daylighting is effective is increased by lightshelves which help get daylight deep into the core spaces. The direct benefit is that the optimized daylighting design is expected to provide nearly 100% of normal ambient light levels during the daytime.

As a secondary energy reduction benefit, reduced electric lighting eliminates the heat load from electric lighting. This reduces the need for space cooling. Thus daylit buildings directly reduce electricity demand and indirectly reduce cooling demand.

One of the most important benefits of daylighting is that it provides a high quality workspace. Daylight changes subtly in connection with time of day and weather, thus connecting occupants psychologically to the outside. Additionally, daylight is full spectrum light, which gives true color rendition and which artificial light sources poorly emulate. The Letterman buildings will provide the real thing.

• **Operable Windows**

For large portions of the year, San Francisco’s mild climate can provide all of the necessary cooling for the Letterman buildings. Operable windows are a simple and energy efficient way to introduce that air to the workspace. As part of a properly designed system, open windows deliver cool, fresh air using little or no energy. Operable windows provide connection to the outdoors, increased occupant control of their surroundings, and free cooling in a simple package. Occupants of the Digital Center will be able to open or close their windows as they desire.

• **Electrical Loads**

A total connected lighting load of 0.8 watts per square foot is our design target. This is based on a daylight responsive lighting strategy called task/ambient design. This strategy optimizes both occupant visual



acuity and energy use. The target for as-used or “plug” loads will be determined by actual measurement of Lucasfilm’s existing facilities. Reductions in internal heat gain loads also reduce required cooling capacity.

- ***Raised Floors***

Raised floors play a central and major role in the integrated design (site, architectural, mechanical, electrical, and structural) for the Letterman buildings. The Letterman Digital Center design uses a raised floor system with displacement ventilation throughout all occupied floor plates. This provides multiple benefits, including both load reductions and increased efficiency.

The raised floor is a simple air distribution system. Conditioned air is supplied through the raised-floor plenum to the room via grilles in the floor surface. When the building needs cooling, as office buildings typically do most of the time, cool air is introduced low in the room directly to the occupied zone. Hot air from the room naturally rises and is exhausted at the ceiling, assisted by pressure from the cool air below.

This simple system reduces the amount of energy a building requires to produce comfortable and healthy working conditions. Heat removal occurs through natural convection plumes, which are particularly effective in a computer intensive environment. Because heat from people and equipment rises directly up and out, less cooling energy is needed to maintain a comfortable temperature. This simplified flow also makes operable windows effective.

Pollutants follow a similar path up and out of the room. This avoids the forced mixing of fresh and stale air typical in earlier office buildings. Air stays fresher in the occupied zone.

Raised floors use considerably more “free cooling” than standard systems. Standard systems deliver 55-degree air. For several reasons, air in a raised floor system arrives at a more comfortable 65 degrees. This means that for a much larger portion of the year, the Digital Center’s air handlers can bring in outdoor air directly without any conditioning other than filtering. The climate at the Presidio site is ideally suited to maximizing free cooling; for most of the year outdoor air temperatures are below 65 degrees.

35-1

Occupants can control the temperature of their work environment. Air supply outlets in the floor are easily adjustable, and there is approximately one outlet per work station. Anybody can simply rotate the top plate on the diffuser and increase or decrease the airflow.

Removing overhead ductwork and using a flat plate concrete structure yields a higher floor-to-ceiling height. This improves daylighting, even while potentially reducing floor-to-floor height.

Lastly, raised floors make office reconfiguration significantly more efficient. Electrical, telephone, and data lines can be quickly rerouted. Without ducts to move or reconfigure, HVAC systems can be updated to suit new arrangements by simply moving floor tiles and diffusers. This reduces material waste while providing the flexibility to help keep these buildings serviceable much longer than typical office buildings.

- ***Night Ventilation or “Pre-cooling”***

An HVAC strategy tied to a raised floor displacement ventilation system also allows “pre-cooling”, or using the structural slab for thermal storage of night ventilation. Night temperatures are lower than peak afternoon temperatures. When the building ventilation fans run at night, the concrete slabs release a considerable amount of heat into the night air flowing over them. During the day when the building needs cooling, the process works in reverse and the slabs absorb heat from the building. Pre-cooling will reduce the peak cooling demand in the Letterman buildings. And, because the fans run at night, they use off-peak electricity that is readily available and less expensive.

- ***Efficient Central Plant***

An efficient central plant makes up the last element in the smart energy supply strategy for the Letterman Digital Center. As mentioned above, the plant will make primary use of cool outdoor air from the mild San Francisco climate to meet a large portion of the cooling load. For the portion of the cooling load that cannot



be met this way, the plant will use a heat exchange system coupled to the groundwater below the site to provide cooling.

The Letterman site sits above a sizable groundwater aquifer. The temperature of this groundwater is approximately 60 degrees, which is ideal for use by the central plant. For comparison, mechanical chillers typically cool water to between 50 and 55 degrees. Without removing any water from the aquifer or affecting the quality of the water, the Letterman plant will use the renewable cooling potential from that water to provide cooling to the buildings. We are investigating innovative means to accomplish this, such as using the mass of the building foundations, which will be below the water table. The effect on the aquifer will simply be an inconsequential temperature increase. Using this system means the buildings will not need to have cooling towers with their related steam plumes and other issues.

STORMWATER

The Letterman Digital Center is designed to produce less stormwater runoff than the current conditions. The Center will capture stormwater to supply water for irrigation and the water feature. The first flush of rainfall would be captured through the landscape and the lagoon. Subsequent rainfall would recharge a cistern built from portions of the existing LAMC and LAIR basements, which are not re-used for parking. This capacity will also augment water available for firefighting. Wherever possible surface pavings such as roads and walkways will be pervious to water.

WATER SUPPLY

The Letterman Digital Center Team has carefully examined water uses in the new facilities. Since a hospital is inherently a large water user, we do not anticipate that the Digital Center will have a higher demand than the existing facility had historically.

35-1

If a source of reclaimed water is determined to be available in the reasonable future, the Digital Center buildings can be double plumbed for reclaimed water usage. This means that a separate system would be installed to supply tertiary treated water to plumbing fixtures such as toilets and urinals, which do not require potable water. Unfortunately, the buildings themselves will not generate sufficient grey water to supply this need. Use of reclaimed water, however, would enormously reduce the Center's demand for potable water.

LANDSCAPE AND HABITAT

The existing landscape at Letterman is largely mature trees like, stone pines, and the interior of the Lucasfilm campus presents the opportunity to set the standard for the rest of the park.

Existing trees deemed historically significant will remain. Specialists will be consulted to recommend native plants where viable and drought tolerant, non-invasive plants will be sought to conform to sensible use of water. Non-monoculture lawn is an appropriate choice given the programmatic requirements. In all cases, the intensive use of the site will be considered in the choice of appropriate ground covers, plants, and trees, soil amendments will also be considered to improve water retention. These new well adapted plants will lower the frequency of pests and diseases thereby lowering maintenance needs. Plant selection and management criteria set forth by the Presidio will further eliminate the problems presented by exotic invasive plants. The sensitive selection, control, and maintenance of all plantings will thus allow the ecological and historical intent of the master plan to show through for future generations.

FINAL THOUGHTS

In the Greening of the Presidio charrette, using the conversion from a military base into a setting for sustainable enterprises was discussed as being the main theme for the park. Setting an example for the future was a common theme, but what is it? How do you show how a sustainable future looks?



The way to find out what the future will be, is to create it yourself. A sustainable future is about fundamentally changing the way that we live and how businesses create services and products. Just as Lucasfilm is redefining the way movies are made and children are educated, we define the future. Digital imaging and the visualization of complex data and information is absolutely one of the core competencies of the Lucas companies, and it is a crucial ability for tackling the complex issues involved in sustainability.

In the design of the buildings and grounds for the Letterman Digital Center, and in the existing renovation that created the Thoreau Center for Sustainability, environmental issues such as energy use (which is the key factor in global warming), water use and runoff (for the health of the bay and upstream ecosystems), and materials use (landfills, habitat destruction, indoor air quality) are handled in an integral fashion. These are key considerations in creating buildings for a sustainable future. The Letterman Digital center is located at a major symbolic entry for the Presidio, and is a set of buildings and a landscape that will age gracefully. The Panama Pacific Exposition marked the beginning of a century of enormous growth; unfortunately much of it was disruptive and damaging to the environment. The Letterman Digital Center at the Presidio celebrates the beginning of a century, one that we hope will be remembered for ecological restoration and the growth of vibrant new cultures and economies.

35-1



William D. Browning
Founder, Green Development Services
Rocky Mountain Institute

Sustainability and green building services consultants for the Letterman Digital Center Team.



Response to Comment in Letter 35

3 5 - 1

Thank you for your letter. As noted in the letter, the commentor is the sustainability and green building services consultant with the development team for the Digital Arts Center. The commentor addresses techniques that would be employed to meet the Presidio Trust's sustainability goals for the project as discussed in Section 1.3.9 (Environmental Sustainability). The Presidio Trust would work with the consultant during planning, design, and construction of the project to ensure that these and other practices are incorporated into the final product to ensure it is a model of sustainable development. No further response is warranted.

Letter 36



PLANNING DEPARTMENT

City and County of San Francisco 1660 Mission Street San Francisco, CA 94103-2414

(415) 558-6378 PLANNING COMMISSION FAX: 558-6409 ADMINISTRATION FAX: 558-6426 CURRENT PLANNING/ZONING FAX: 558-6409 LONG RANGE PLANNING FAX: 558-6426

Presidio Trust REC'D
AUG 12 1999

August 2, 1999

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

Presidio Trust REC'D
AUG 12 1999

Dear Coordinator:

Thank you for the opportunity to review the Draft Environmental Impact Statement (EIS) regarding the Letterman Complex. As you are aware, San Francisco has jurisdiction over residential and commercial neighborhoods immediately adjacent to the Presidio, as well as some of the public right-of-ways that would be affected by the proposed project. Changes to facilities within San Francisco jurisdiction would require authorization from the City, as would long-term access to City services such as sewer treatment and water supply.

This letter and attachments provide comments on the Draft EIS from staff of the San Francisco Public Utilities Commission, San Francisco Planning Department, and San Francisco Department of Parking and Traffic, and the Municipal Railway (MUNI). Comments reflect input from individual members of the San Francisco Board of Supervisors, and public testimony received at the Board's Public Health and Environment Committee on June 29 and July 22, 1999.

Purpose and Need

- City staff is cognizant of the unique challenges associated with the long-term sustainability of the Presidio, and we believe that most San Franciscans are supportive of development efforts necessary to ensure the preservation of the national park. It is difficult to determine from the Draft EIS, however, precisely *why* development of the Letterman Complex at the intensity envisioned is necessary to achieve this goal. For the benefit of all, please summarize budgetary needs of the Trust, including the cost of anticipated capital improvements, and the revenue associated with leasing of existing facilities. Demonstrate *how* the proposed development is "needed to achieve the Presidio Trust Act's mandate that the Presidio Trust be financially self-sufficient by 2013" (Draft EIS, p. 3).

36-1

Water Supply

- The City and County of San Francisco is under no obligation to supply water to the Presidio. San Francisco has historically supplied water to the Presidio under extraordinary circumstances on an interruptible basis, such as during the water treatment rehabilitation

36-2



project by the National Park Service. Supplies of water for contingency and emergency purposes could possibly be made available in the future through connections between the City and County of San Francisco and the Presidio, but would require appropriate additional facilities for such service. Required facilities would include additional water service and storage facilities near or in the Presidio for fire flows and other purposes.

36-2

- By calling for general water conservation practices and the use of an (unspecified) alternate water supply, Mitigation Measure WS-2 may not be effective in resolving potential water supply problems at the Presidio. The City and County of San Francisco is developing recycled water in phases. Recycled water for the east part of the Presidio will not be available until the final phases of this program, if at all. We suggest that on-site reclamation be considered as an alternative way to meet the conservation goals articulated in the EIS.

36-3

- An overall plan for water use, water reclamation, and water conservation at the Presidio should be developed to comprehensively addresses these issues for build-out of the entire Presidio. Without such a planning document, it is difficult to see how the monitoring of flows in Lobos Creek called for in Mitigation Measure WS-3 will adequately protect that resource from over use. City staff would like assurances that there is sufficient water supply to provide for all projected development at the Presidio before incremental project approvals lead to an “emergency” where none should exist.

36-4

- Additional information should be provided regarding in-stream flows necessary to protect Lobos Creek. How was the figure of 0.5 mdg (p. 53) arrived at? What are the implications for other users of water on the west side of San Francisco?

36-5

Sanitary Sewage

- San Francisco is under no obligation to accept sanitary sewage from the Letterman complex or from the Presidio as a whole on a long term basis. As explained (Draft EIS p. A-6), Letterman’s existing sanitary sewer system discharges into the City’s combined sewer system and receives treatment at the City’s Southeast Water Pollution Control Plant (SEWPCP). While the SEWPCP currently has sufficient dry weather capacity to accept maximum flows from the Letterman complex (estimated at 78,000 gallons per day), there is substantial public concern regarding the discharge of partially treated sewage from the SEWPCP during major storm events.

36-6

Development at the Presidio will contribute incrementally to overflow (CSO) volumes, and we encourage the Trust to consider ways to off-set increases in CSO volumes attributable to increased sanitary flows. Possible techniques for off-setting increases and for addressing



long term water supply issues include on-site reclamation/treatment of sanitary sewage. Consideration should also be given to on-site storage of sanitary sewage during wet weather events, and redirecting flows from the SEWPCP to the City's Oceanside facility.

36-6

Drainage and Water Quality

- Alternative 5 (Digital Arts Center) is described as containing a "water resource management system" providing for the collection and storage of storm water in underground cisterns, and the use of this water for irrigation "after biofiltering through the lagoon and wetlands" (pp. 33-34). Mitigation includes "structural and operational best management practices" such as oil/water separators, infiltration systems, detention basins, and biofilters, erosion control, maintenance activities, pavement cleaning, tenant controls and education, and etc. (P. 35).

There is insufficient information provided to evaluate the project's impact on water quality or the effectiveness of suggested BMPs. Development at the Presidio will substantially increase vehicular use, and will result in increased pollutants in storm water. The EIS should estimate the volume of storm water collected and reused and the volume discharged to the bay. The EIS should also specify projected concentrations of pollutants in bay discharges. If a lagoon or wetlands will be used as "biofilters," how will these areas be monitored and maintained? How will the gradual build-up of pollutants in these areas be prevented or addressed?

36-7

Transportation and Air Quality Issues

- The proposed signalization of the Lombard/Lyon intersection is on City property, and could be implemented only with the City's agreement and authorization. Funding would need to be secured. Concurrent with installation of this signal, and installation/modification of other signals also requiring City authorization, the City may require other improvements to aid the flow of traffic, transit, and pedestrian access. A pedestrian over crossing from the Presidio to the Exploratorium could increase pedestrian safety and improve physical connections between the City and the Presidio.

36-8

The source of funding for transportation improvements affecting State-owned facilities should be identified, and consideration should be given to the potential applicability of Section 4(f) requirements if any approval or funding is anticipated from agencies within the US Department of Transportation.

- While the EIS acknowledges that the San Francisco County Transportation Authority is engaged in planning for Doyle Drive (p. 108), it fails to discuss access to the Letterman

36-9



complex in the context of identified Doyle Drive alternatives. The justification that “substantial development [of Letterman] would occur prior to reconstruction of Doyle Drive” (p. 110) is insupportable given the obligation under NEPA to consider reasonably foreseeable projects and the State’s mandate to address deficiencies associated with the existing Doyle Drive facility.

The EIS should include an illustration of the Doyle Drive interchange referred to on p. 110, and should discuss if any previously identified alternatives for Doyle Drive would be precluded by the proposed development at the Letterman site. The EIS should also consider the implications for Gorgas Avenue access to the Letterman complex given conclusions of the Doyle Drive Task Force study.

36-9

In the absence of an interchange, how would access to the Letterman site slow traffic and transit operations along what is considered a regional transportation facility? Could access to Letterman be relocated to the west, so as to distribute traffic through the Presidio, rather than focussing it at one or two intersections?

- We understand from Presidio Trust representatives, that the illustration of the Richardson Avenue/Gorgas Gate intersection (p. 109) is incorrect, as is a (slightly improved) illustration in the background Transportation Technical Report dated April 14, 1999. Please revise the EIS to include an accurate sketch showing the existing intersection configuration and proposed improvements. Please also provide a detailed drawing (at 1"=50' scale) to the City and Caltrans to allow a determination as to whether sufficient right-of-way exists for the proposed improvements.

36-10

- The suggestion that a second signal is required in order to maintain the two-phase signal operation at Lyon/Richardson/Gorgas (p. 108) is confusing, since that the intersection is planned to have three phases regardless of the second intersection.

36-11

- The EIS does not address potential impacts associated with removal of the existing traffic signal at Richardson/Francisco. In addition to affecting traffic circulation, elimination of this signal and forcing right turns at this location may impact bicycle circulation along an existing bicycle route, and may affect pedestrian access to transit stops on Richardson Avenue.

36-12

- Citizens of the Marina District have expressed concerns regarding the potential for increased through traffic along Marina Boulevard as a result of proposed traffic signals and other circulation changes on Richardson, Gorgas, and Lombard. It is the City’s policy to discourage and reduce through traffic along streets such as Marina Boulevard (Transportation Element Policy 18.5, *San Francisco General Plan*). The EIS should clearly describe trip

36-13



origin/destination assumptions, existing and future traffic assignments, and the rationale for each. Measures to monitor traffic increases within and adjacent to residential neighborhoods should be considered, along with actions to address these increases should they occur. 36-13

- The EIS should describe on-street parking conditions on City streets in the vicinity of the Letterman complex. Are any impacts on these streets anticipated? While (unspecified) plans to provide for a constrained parking supply (p. 107) may be desirable in terms of encouraging alternative modes of transportation, what impacts will this have on neighborhood parking supplies (e.g. the Marina Green parking areas)? 36-14

- The City’s Department of Parking and Traffic has been requested to provide all-way STOP signs at the intersection of Lombard/Baker. What will the impact of stopping Lombard Street traffic at Baker Street have on access to the Presidio from Lombard Street? 36-15

- Will development at Letterman generate an increase in tour buses and shuttle buses? If so, where would the additional buses enter and exit the Presidio, where would they lay-over, what would be their hours of operation? Tour buses and charters are not allowed to operate on certain streets in the Presidio or the City. These prohibitions should be noted, along with any proposed changes. Will helicopter and water taxi service be considered to access the Presidio or the Letterman complex? Where would these services be provided, and what would be their impacts? 36-16

- Alternative 5 (Digital Arts Center) would include a “Transportation Demand Management program” which “might” include “a guaranteed-ride-home program, telecommuting policies, preferential parking program for carpools and vanpools” and other (unspecified) incentives to reduce vehicle trips (p. 33). Other features of the TDM program are described on p. 107 and 165 of the EIS. The effectiveness of TDM measures is not described, and it is unclear whether the analysis of regional and localized air quality assumes that these measures will be implemented, and with what success rate. We suggest that the Presidio Trust develop specific performance targets, monitor non-auto mode shares, and take steps to increase incentives if targets are not met. 36-17

- The description and illustration of transit services (pp. 1-10 and 1-11) should be corrected. Line 29 does not run south of Lombard Street on Presidio Boulevard as depicted. The outer terminal for Lines 41 & 45 is currently on Lyon between Greenwich and Baker. The long-line terminal for Line 29 is located at Letterman. These should be indicated on the map. Line 76 is not indicated on the map. Lines 30 and 30X are not described in Table 1.4. 36-18



- The City’s Municipal Railway (MUNI) uses a cumulative approach whereby 63 new passengers equate to one standard coach of service demand, with the system assumed at capacity unless demonstrated otherwise for individual lines. Cumulatively 122 new PM Peak riders with external destinations as generated by Alternative 5 would equate to almost two coaches of demand. MUNI questions the validity of the trip generation numbers presented, since the number of transit trips seems low for a project of 900,000 sq. ft. 36-19
- The extension of MUNI trolley coach lines 41 and 45 into the Presidio has been programmed in MUNI’s Ten-Year Capital Improvement Program since 1996, as requested by GGNRA planners. However, capital funds have not been identified to implement this project. Funding should be provided (directly or through the City’s Transit Development Impact Fee program) for the extension of the 41-Union and 45-Union-Stockton MUNI bus lines into the Presidio and to the Letterman complex (capital and marginal operating costs). 36-20
- Several of the Alternatives considered would result in significant regional emissions of NOx, although Alternative 5 falls just below the BAAQMD standard (74 instead of 80 lbs/per day) (p. 167). Clearly when considered in the context of other developments at the Presidio, there is reason for concern associated with cumulative emissions from traffic. We encourage the Presidio Trust to consider other measures to reduce vehicle trips, measures to increase transit use, and measures to encourage the use of alternative fuels. Fueling stations and preferential parking should be provided for alternative fuel vehicles. 36-21

Housing Demand

- According to the EIS, Alternative 5 (Digital Arts Center) would result in the demand for about 481 housing units, of which 265 could be supplied at the Presidio (p. 163). A mechanism for reserving Presidio housing for Letterman employees is not described. 36-22
- It is unclear why the unmet demand for housing (estimated at 216 units in the EIS) is dismissed as insignificant in the context of cumulative development at the Presidio and elsewhere in the region. San Francisco is currently experiencing a shortage of housing, particularly affordable housing. In this context, any unmet housing demand would appear to be a significant *socioeconomic impact* warranting mitigation under NEPA. 36-23
- Using formulas provided in the City’s Jobs-Housing Linkage program, a project of between about 600,000 and 900,000 sf of office space would be required to fund construction of between 97 and 145 units of affordable housing, or to contribute affordable housing development fees of between \$4.2 and \$6.3 million. 36-24



Letterman Complex Draft EIS
Comment Letter
Page 7 of 7

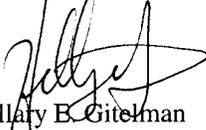
Construction Impacts

- The suggestion that Alternative 5 would be constructed in one continuous construction program (p. 34) seems somewhat unrealistic and clearly undesirable. Please consider condensing the construction period, so that facilities are constructed simultaneously, reducing the duration of exposure to construction air emissions, significant construction noise impacts, and traffic detours/congestion. Alternatively, the Trust should consider permitting the construction of site facilities in phases to allow for the monitoring of traffic impacts, transit mode share, etc. associated with each completed phase prior to authorizing construction of subsequent phases.

36-25

Again, thank you for the opportunity to comment on the Draft EIS. Please don't hesitate to call me at (415) 558-6381 if I can answer any questions regarding the comments provided above, or if I can supply any information to assist your staff in preparing the final document.

Sincerely,



Hillary E. Gitelman
Environmental Review Officer

cc. Supervisor Tom Ammiano
Supervisor Gavin Newsom
Members, San Francisco Board of Supervisors Public Health and Environment Committee

HEG:\WP51\CORRESP\PRESIDIO.EIS



Responses to Comments in Letter 36

3 6 - 1

Thank you for your letter. The discussion of the purpose and need for the project has been expanded in Section 1 of the EIS. In addition, please refer to the FMP in Appendix E of the Final EIS, and to master response 10A.

3 6 - 2

The Presidio Trust appreciates the City and County of San Francisco's offer to possibly supply water for contingency and emergency purposes in the future. At this time, the Presidio water system is adequate for handling emergency flow requirements. A minimum of 3 million gallons of water is maintained in the Presidio's reservoir as a reserve for fire and emergencies as required by the Presidio Fire Department. The distribution system has two large main-line connections to the CCSF's system that feed directly to the reservoir. These connections are normally closed unless there is an emergency water demand.

3 6 - 3

Refer to master response 13.

3 6 - 4

Implementation of mitigation measures WS-2, *Water Supply- and Demand-Side Solutions to Reduce Cumulative Impacts*, and WT-1, *Water Reclamation Plant to Reduce Cumulative Impacts*, would adequately address potential park-wide deficiencies in water supply, taking into account water demand based on projected development at the Presidio. Should additional solutions be explored through monitoring and additional analysis, the Presidio Trust would work with CCSF officials to ensure their concerns are addressed and any need for city water is minimized. Also refer to response to comment 36-2 and master response 13.

3 6 - 5

Additional information on minimum in-stream flows to protect Lobos Creek is provided in the Restoration Plan for Lobos Creek prepared in 1995 (NPS 1995) for the NPS. The study concluded that flows above 0.5 million gallons per day (0.77 cubic feet per second) would be required to preserve the channel depth and bank slopes of the creek to ensure the adequate protection of existing plant and wildlife habitats, and a distinct aquatic connection to the Pacific Ocean. Maintained creek flow may also prevent standing water and salt water intrusion from the ocean into the aquifer water supply. Free flow reduces mosquito breeding and protects fresh-water dependent communities, thus preserving opportunities for public enjoyment of the downstream section of the creek. Maintained flow across Baker Beach provides a unique aesthetic, recreational, and ecological resource. According to the study, should users of water on the west side of San Francisco use wells as a supplementary water supply, if the wells are located within the Lobos Creek groundwater basin, they could reduce seepage into the creek (depending on the location, number of wells, and pumping rate). Lower flows would still maintain wetland vegetation in the creek bed, but would probably not scour a clear channel across Baker Beach.

3 6 - 6

Refer to master response 14.



3 6 - 7

Refer to master response 15.

3 6 - 8

The Trust will be coordinating with the city’s Department of Traffic and Parking regarding proposed improvements at the Lombard Street Gate. A pedestrian overcrossing was not proposed because of extremely limited space for an overpass terminus on the Exploratorium side of the roadway. However, the city can suggest further study of an overcrossing as part of either the Letterman Access Project Study Report (see master response 18) or Doyle Drive scoping. At the present time, state funding is not being sought for the project. The current plan does not appear to trigger any 4(f) considerations.

3 6 - 9

First Paragraph – The analysis in the EIS did not consider Doyle Drive alternatives because they have not yet been identified in the county’s new study and because the Trust wanted to analyze a “worst-case” scenario where no other access points to the Presidio from Doyle Drive had been identified.

Second Paragraph – The “new interchange” referenced in Section 4.1.7 is not a specific physical structure, but rather a supposition that a future Doyle Drive is likely to include an interchange providing direct access between Doyle Drive and the Presidio. See response to comment 23-67 regarding the Gorgas Avenue alignment.

Third Paragraph – It would be extremely difficult and expensive to locate access further west because Doyle Drive is on structure at that point. Although this might prove to be the best long-term solution and should be studied as part of Doyle Drive reconstruction, it is not a feasible short-term access mitigation.

3 6 - 1 0

Figure 15 has been corrected. The arrows depicting the eastbound through movement at the southernmost intersection and the eastbound right-turn movement at the northernmost intersection have been eliminated from the figure. A detailed drawing of the improvement to a scale of 1:50 has not been developed. However, cross-sections of Richardson Avenue north and south of Lyon Street have been prepared for existing conditions and conditions with the proposed improvements, and have been submitted to the city’s Planning Department and to Caltrans for their review. The PSR/PR effort (see master response 18) will develop the detailed drawings of these improvements.

3 6 - 1 1

See master response 18.

3 6 - 1 2

Removing the traffic signal at the intersection of Richardson Avenue and Francisco Street would be prompted by the creation of a new intersection slightly northward. The transit stop for buses traveling northbound on Richardson Avenue would be relocated to a point immediately north of Lyon Street, as shown in Figure 15. Pedestrians walking between this bus stop and the Presidio would cross at the crosswalk on the north side of Lyon Street. The bus stop for the southbound direction of Richardson Avenue would remain at its current



location, but pedestrians crossing Richardson Avenue to this bus stop would cross at the new intersection at Lyon Street, rather than Francisco Street as they do currently.

Removing the traffic signal at Richardson Avenue and Francisco Street would impact bicycle circulation. The portion of the city's bike route 4 extending from Broderick Street to Lyon Street on Francisco Street would need to be relocated to Chestnut Street (see Figure 18, Bicycle Routes in the Final EIS). This would have no significant impact on bicyclists because the distance would be the same as the current route and the portion of Chestnut Street used for the route is residential in character and similar to the Francisco Street route.

3 6 - 1 3

Appendix D of the EIS discusses the assumed geographic distribution of trips generated by the Letterman Complex (Table D-6), the assignment of project-generated p.m. peak-hour vehicle trips to Presidio gates (Table D-7), and Year 2010 turning movement volumes at each of study intersections (Figures D-1 through D-6). As shown in Table D-7, the majority (about 65 percent) of the project-generated p.m. peak-hour vehicle trips were assigned to the Gorgas Avenue Gate under Alternatives 1 through 5.

The proposed intersections on Richardson Avenue would provide the most direct vehicular access to the Letterman Complex, thereby minimizing any project-related impacts on the streets of the surrounding residential neighborhoods. The Presidio Trust will periodically monitor traffic volumes at Presidio gates, and is also willing to coordinate with the San Francisco Department of Parking and Traffic to monitor traffic volumes in adjacent residential neighborhoods.

3 6 - 1 4

A survey of parking conditions mid-morning on city streets in the immediate vicinity of the Letterman Complex, conducted for the park-wide Parking Management Study, indicated that on-street parking in the area is 58 percent occupied. All of the surveyed streets have time restrictions limiting non-residents to either 2 or 3 hours. Because the project-related parking demand would be largely comprised of long-term, or employee, parking demand, the time restrictions imposed on on-street parking in the vicinity of the Letterman Complex would discourage employees driving to and from the 23-acre site from parking on the residential streets near the Letterman Complex.

It is possible that some employees and visitors to the Letterman Complex and Crissy Field may seek on-street parking along the south side of Marina Boulevard and in the vicinity of the St. Francis Yacht Club and the Golden Gate Yacht Club. During weekdays on-street parking is typically available on Marina Boulevard, although vehicles without a residential permit are limited to 2 hours. Parking is also available at the curb on Yacht Road (about 200 spaces) and in the off-street lot between the St. Francis Yacht Club and the Golden Gate Yacht Club (about 200 spaces). A portion of this supply is reserved to the yacht harbor permit-holders, but, in general, this parking is available to anyone. During field surveys parking along Yacht Road was observed to be 80 to 100 percent occupied during days when events are held at the harbor and 30 to 65 percent occupied on non-event weekdays. Access to this parking supply involves at least a half-mile walk between Marina Boulevard (at Baker Street) and the Letterman Complex, and therefore it is not expected that there



would be a substantial increase in weekday parking utilization along Marina Boulevard. Please see master response 20.

3 6 - 1 5

The various alternatives would add between 25 and 40 eastbound vehicles and between 10 and 25 westbound vehicles through the intersection of Lombard and Baker streets during the p.m. peak hour. The intersection of Lombard and Baker Streets currently has all-way stop signs, and the currently most congested approach (southbound) operates at LOS A during the p.m. peak hour. Under Existing plus Project conditions, the addition of 40 eastbound and 25 westbound vehicles through this intersection would not change the southbound approach's operating conditions from LOS A. Under cumulative (year 2010) conditions, the southbound approach would operate at LOS C, with and without the addition of traffic generated by the proposed project (note: the stop signs were installed subsequent to receipt of the comment).

3 6 - 1 6

Regarding tour buses, see response to comment 32-5. Helicopter and water taxi service are not expected as part of the Letterman access project. The Trust is working with the GGNRA to plan water access at Torpedo Wharf on Crissy Field with connection to the Trust internal shuttle. However, no water taxi trips were assumed in the traffic analysis for the EIS.

3 6 - 1 7

See master response 19.

3 6 - 1 8

The commentor is referring to figures in the Transportation Study Report that were prepared to provide background transportation information for the Draft EIS. The 29-19th Avenue line does run south of Lombard Street on Presidio Boulevard. The 76-Marin Headlands line is not shown on the illustration of transit routes and is not included in the transit analysis because of its limited operating hours. Because it operates on Sundays and holidays only at a one-hour headway, its operating hours are inconsistent with the weekday p.m. peak hour analysis period. However, the operation of this line is discussed in the text of the Transportation Study Report. Because the 30 and 30X operate within the area depicted in the illustration of transit services, these MUNI lines were shown in the figure. In response to the comment, a description of MUNI lines 30 and 30X and of the terminal locations of each described MUNI line has been added to the description of transit services in the Transportation Study Report.

3 6 - 1 9

The proposed methodology for calculation of transit demand is not appropriate for the Letterman Complex. Although the MUNI lines that serve the Presidio are well-used, the maximum load points (MLPs) on most of these lines are quite far from the Presidio, and sufficient capacity exists on these lines to accommodate the additional demand that would be generated at the 23-acre site. The number of trips that would be generated at the site is based on the trip generation rates that were developed after researching rates from several different sources, including the San Francisco Guidelines for Environmental Review, the Institute of Transportation Engineers Trip Generation and the Presidio Validation Study, 1988. Mode split assumptions are based on

Presidio employee survey results and analysis contained in the 1994 GMPA. The 23-acre site is located far from downtown and consequently has a lower transit mode split than sites located more conveniently to the MUNI bus and rail network.

3 6 - 2 0

The Presidio Trust agrees with this comment and will be working with MUNI to develop funding for this program.

3 6 - 2 1

The Presidio Trust is actively working in all the programs cited to help reduce vehicle emissions. A number of other comments discuss overall vehicle trip reduction. In addition, the Trust is currently moving toward having its own fleet (which services the park) on alternative fuels and has started by converting 15 trucks to all-electric operation. The Presidio has a CNG fueling station that services Trust as well as other public vehicles. The Trust is working to develop an alternative fuels car-sharing program and the proposed internal shuttle will use alternative fuels. Preferential parking for alternative fuel vehicles will be considered as part of the Trust's parking management program.

3 6 - 2 2

All housing leases at the Presidio currently are one-year leases. As these leases come up for renewal, Presidio-based households (households with at least one employee of a Presidio-based tenant organization) have priority for leasing. As of September 30, 1999, the end of the Presidio Trust's fiscal year, there were 236 Presidio-based households out of 731 total units leased, with 385 units still to be made ready for leasing. This capacity to accommodate Presidio-based households, coupled with normal turnover, will allow the Presidio Trust to accommodate the employee demand for 265 housing units associated with Alternative 5.

3 6 - 2 3

The housing demand is quantified in Section 4.5.5.1, Increase in Housing Demand, to provide a benchmark for understanding the level of effect on San Francisco and the Bay Area. The determination as to whether a less than one percent increase in demand for housing would be considered a significant impact is somewhat subjective. However, the shortage of housing in the city for low- and moderate-income groups is noted, and the text in Sections 4.3.5.1 and 4.5.5.1 of the Final EIS has been revised to note the adverse impact on affordable housing in the city.

To limit the demand for affordable units in San Francisco, the Presidio Trust offers reduced rental rates to Presidio employee and tenant households with gross household incomes of less than \$45,000. As Presidio buildings are reoccupied and park programs and activities are established, the need for additional onsite housing, including affordable housing, would be analyzed based on actual employment patterns and related housing demands associated with building uses.

3 6 - 2 4

Development within the Presidio is under exclusive federal jurisdiction and is not subject to city housing impact fees. The Presidio Trust applies revenues from market rate residential and non-residential leasing to



make it possible to reduce rental rates to households with gross household incomes of less than \$45,000 (see response to comment 36-23).

3 6 - 2 5

As in all construction, there are tradeoffs between having tight restrictions on activity (e.g. time-of-day restrictions) that prolong the construction process while lessening the impacts during construction, and fewer restrictions that shorten the construction period. These will be addressed as described in mitigation measure TR-5, *Construction Traffic Management Plan*.



Letter 37



July 30, 1999

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

Via Fax: 415/561-5315

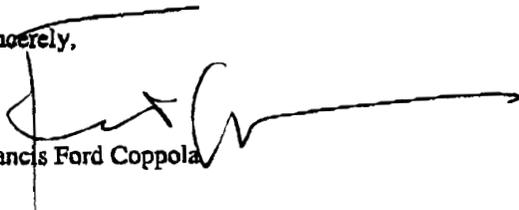
Dear Mr. Pelka,

I am happy to write a letter in support of Letterman Digital Arts. I understand the general plan calls for the Presidio to be used for arts, education, research, innovation, communication, and community service. Letterman Digital Arts meets every requirement.

As an independent filmmaker in the Bay Area for over 20 years, I know the importance of building a local community of artists and technicians. The Lucas companies have been built on a simple philosophy. You hire talented people, train them, give them a creative environment to work in, provide them with the resources to experiment, and nurture them. The results have been phenomenal. ILM is world renowned as the leader in special effects, THX has set new standards in sound and changed the way audiences see and hear films, and LucasArts has provided the best in inter-active entertainment since its inception. The entire industry benefits from the technological breakthroughs pioneered by the Lucas companies and by the talent trained by these companies. A recent article cited the successful start-up companies founded by former employees of ILM and LucasArts.

Building an eclectic artistic community at the Presidio site is important for San Francisco. As a longtime resident of the Bay Area, I am delighted the Presidio Trust recognizes that Letterman Digital Center will benefit the city and the entire area by continuing its tradition of attracting the best and the brightest to this community.

Sincerely,


Francis Ford Coppola

916 KEARNY STREET SAN FRANCISCO CA 94133 PHONE 415-788-7500 FAX 415-989-7910



Response to Comment in Letter 37

3 7 - 1

Thank you for your letter. The organization's support of the Letterman Digital Center is noted for the record.



Letter 38

ADRIANA PAASCHE DAKIN

765-H Portola Street • The Presidio • San Francisco, CA 94129
Tel: 415-441-1804 • Fax: 415-561-7778 • apd@igc.org

PRESIDIO TRUST REC'D

SEP 10 1999 1:03

Date: July 30, 1999
Re: **Letterman Hospital Complex**

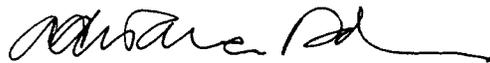
Dear Presidio Trust:

As a Presidio resident and employee (Center for Citizen Initiatives within the Tides Center), the decision to invite the Lucas companies to be a tenant in the Letterman Hospital complex makes me worried. Regarding Lucas' 2,500 staff and significant building plans, I am especially concerned about the potentially serious **environmental** impact on the Presidio National Park.

I hereby voice my dissent to the decision to lease/rent the Letterman Complex to the Lucas companies.

However, I'd like to commend the Trust on recent Park improvements, including an improved fire department, park signs, and residential grounds maintenance. It's wonderful to live and work here, and I'd like to help it remain (and grow increasingly more) so.

Thank you,



Adriana Dakin

38-1



Response to Comment in Letter 38

3 8 - 1

The concerns of the commentator are noted for the record.



Letter 39



SAN FRANCISCO COUNTY TRANSPORTATION AUTHORITY

100 Van Ness Avenue, 25th Floor, San Francisco, CA 94102 (415) 522-4800 - Fax: (415) 522-4829 E-mail: sfcta@ci.sf.ca.us

July 29, 1999

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

1999 JUL 29 1:00 PM
PRESIDIO TRUST REC'D

Subject: Comments on the Environmental Impact Statement (EIS) Supplement – Letterman Complex

Dear Coordinator:

Thank you for the opportunity to review and comment on the Letterman Complex EIS. Proposed development at the Letterman Complex will be closely related to the planned Doyle Drive replacement project, and it will also affect circulation and parking in adjacent San Francisco neighborhoods. The Authority is commenting in its capacity as Congestion Management Agency (CMA) for San Francisco, and as lead agency for development of the Doyle Drive EIS/EIR. As CMA the Authority is the City's strategist for transportation system investment, and we have a critical responsibility to establish the link between transportation system investment and transportation system performance. We are also responsible for developing San Francisco's Long Range Countywide Transportation Plan and for developing and maintaining a travel demand model and transportation analysis database for the City.

Our comments incorporate by reference the transportation section of the letter of comments already submitted to you by Hillary Gitelman on behalf of the San Francisco Planning Department and various other City departments. In addition, we have the following specific comments:

39-1

1. Relationship to Gorgas Avenue: All five project alternatives call for significant new development on property immediately adjacent to Gorgas Avenue, within the Presidio. Each alternative also anticipates improvements to two intersections along Richardson Avenue connecting to Gorgas Avenue via a couplet. All recent planning efforts regarding the Doyle Drive replacement project have at least considered the potential use of an alignment along Gorgas Avenue instead of the existing alignment along Richardson Avenue. The City will choose a preferred alternative at the completion of the Doyle Drive EIR/EIS in 2001. The EIS should discuss the likely conflicts between the proposed Letterman Complex and a potential Gorgas Avenue alignment for Doyle Drive, specifically addressing, from the perspective of impacts on Doyle Drive right of way, capacity, operations, and traffic safety, whether, and under what conditions, the proposed development would ultimately preclude a Gorgas Avenue alignment for Doyle Drive.

2. Effects on Doyle Drive Operations: The Doyle Drive Intermodal Study (1996) proposed the use of a transit center and signalized at-grade intersections to provide direct access to the Presidio from a new Doyle Drive. Assuming an at grade Doyle Drive parkway alignment along Richardson Avenue, the EIS should also specifically discuss the impacts on Doyle Drive traffic of reconfiguring the Gorgas

39-2

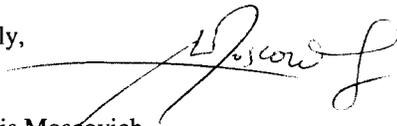


Letterman EIS, Page 2
7/29/99

- intersection, and address how changed traffic signal phasing would affect Doyle Drive operations.] 39-2
3. Existing Conditions: Little data are presented on existing traffic conditions. Table 15 provides data mostly from 1994 PM peak-hour traffic volumes at eight Presidio gates. Data for existing average daily traffic volumes (ADT), intersection levels of service (LOS), mode splits and similar presentations could not be found.] 39-3
4. No-Action Alternative: Alternative 6, Minimum Management (No Action) includes new leasing activities and improvements to existing facilities and is, therefore, not a true no-action alternative. Data tables do not conveniently compare project alternative impacts with a no-project condition.] 39-4
5. Mode Splits: Although find the estimate of mode splits in the EIS reasonable, the high automobile share (70% for external trips) underscores the need for the Presidio Trust to develop specific performance targets for the proposed TDM program and closely monitor its progress.] 39-5

Once again, thanks you for the opportunity to comment, and please call me at 522-4803 with any questions.

Sincerely,


José Luis Moscovich
Director – Plans and Programs

Cc: CCC
LS
Hillary Gitelman, DCP
Dick Tilles, Presidio Trust



Responses to Comments in Letter 39

3 9 - 1

See master response 21.

3 9 - 2

The improvements near the Gorgas Avenue Gate are proposed to alleviate traffic congestion and Letterman access problems prior to a permanent Doyle Drive reconstruction (refer to master response 18). The Presidio Trust will be coordinating the proposed improvements with both Caltrans and the city to determine whether such improvements can be made part of the more extensive Doyle Drive project.

3 9 - 3

In order to ensure that the existing traffic volumes used for this analysis were the most recent and accurate possible, traffic counts were conducted during the p.m. peak period (4 p.m. to 6 p.m.) on Wednesday, January 13, 1999, and during the a.m. peak period (7 a.m. to 9 a.m.) on Thursday, January 14, 1999 at four of the five study intersections. Traffic counts were not conducted at the intersection of Marina Boulevard/Mason Street at this time due to construction activities in the area, which would not represent typical conditions. Existing counts from the GMPA EIS were used for this intersection.

The traffic counts conducted in January 1999 were compared to the traffic counts made for the GMPA EIS. Section 3.9.2 describes the average daily traffic volumes observed at the Presidio gates in 1998 and existing levels of service. Figure 11 depicts existing intersection p.m. peak-hour turning movement volumes at the study intersections, and Figures 1 through 6 in Appendix D depict the Year 2010 p.m. peak-hour turning movement volumes under each alternative. Assumed travel characteristics such as modal split and geographic distribution of trips are summarized in Section 4.1.7, and explained in further detail in Appendix D.

3 9 - 4

The no action alternative (Alternative 6) as discussed in the EIS represents no change from current management direction or level of management intensity as intended by NEPA. Under NEPA guidance, to construct a no management alternative would be an academic exercise which would provide an inappropriate benchmark to compare the magnitude of environmental effects of the action alternatives (Forty Questions No. 3 in Council on Environmental Quality 1981).

3 9 - 5

Refer to master response 19.



Letter 40

SAN FRANCISCO TREE COUNCIL

2310 Powell # 305, SF CA 94133 * sftreecouncil1@juno.com * (415) 982-8793

WE ARE DEDICATED TO INCREASE UNDERSTANDING AND APPRECIATION OF THE VALUE OF MATURE TREES, TO PRESERVE AND PROTECT THEM IN OUR URBAN ENVIRONMENT

August 2, 1999

National Environmental Policy Act
Compliance Coordinator
34 Graham St., P.O. Box 29052,
San Francisco, CA 94129-0052

Att: Letterman Complex, Presidio Trust
Re: Presidio Letterman Draft Environmental Impact Statement.

PRESIDIO TRUST REC'D
MAY 10 1999 3:06

We are very much concerned with the loss of existing mature trees on our streets and in our parks due to design or development plans. The current plan for the Presidio Letterman site is the least compatible with the trust's own published guidelines and amounts to the **industrialization of our national park**. If the Presidio Trust's process has resulted in this outcome, then something is very wrong with the process!

In Appendix B, Planning Guidelines of the DEIS, states that the natural landscape guidelines are intended to **preserve, protect and enhance "natural features that include exiting mature trees,"** and the "wildlife habitat areas which occur in association with these existing trees." Unfortunately, the DEIS doesn't follow it's own guidelines.

40-1

The DEIS discussions of the affected environment (Section 3) and the alternatives don't provide any information about the **mature trees** in the area. It doesn't list the numbers, sizes, or species of trees, or their condition or age. It doesn't give an estimate of **how many would be removed** or protected and preserved, as the appendix sets as a guideline.

The Draft Environmental Impact Statement must be amended to include the information required for the public to determine the impact on the natural resources in the Presidio-Letterman site. We oppose any development that is not related to improving the quality of visitor and locals experience of their park. We urge you to preserve and protect the existing beauty and character of this priceless resource.

Sincerely,

Carolyn Blair, Chair
SF Tree Council



Response to Comment in Letter 40

4 0 - 1

Thank you for your letter. The commentor's concerns about the loss of existing mature trees are noted for the record. The commentor pointed to inconsistencies between the Planning Guidelines and the Draft EIS which have now been corrected within the Final Planning Guidelines. In short, the Draft Planning Guidelines were erroneous in assuming that all existing mature trees would be preserved and protected. Rather, the intent of this section of the Planning Guidelines is to preserve and protect existing mature trees that have been identified as having the most valuable wildlife habitat (based on observed bird diversity and use) as discussed in Section Q, Wildlife, of Appendix A of the EIS. These mature trees would include the coast live oaks, the palms, the redwood, and the eucalyptus trees and Monterey pines within the historic windrows bordering the 23-acre site. Please refer to the text revisions within the Final Planning Guidelines for additional clarification on this subject. Concerning the need for additional information about the mature trees within the 23-acre site, refer to master response 16.

