

Alternatives 1, 2, and 3. With the Park Presidio Boulevard Access Variant, Alternative 4 would result in roughly half the amount of traffic through the 14<sup>th</sup> and 15<sup>th</sup> Avenue Gates during the AM and PM peak hours, respectively, as Alternative 4 with the couplet.

#### **3.2.2.4 Safety Considerations**

Residents in the neighborhood adjacent to the PHSH have expressed concerns about potential increases in conflicts between traffic and pedestrians and bicyclists. The intersections of Lake Street/Park Presidio Boulevard and California Street/Park Presidio Boulevard are often specifically mentioned as concerns due to past traffic accidents, including some involving pedestrians and bicyclists.<sup>12</sup>

Traffic volumes at the intersections of Lake Street/Park Presidio Boulevard and California Street/Park Presidio Boulevard are projected to increase in the future, whether or not the proposed action or any other changes occur in the PHSH district. As explained above in Section 3.2.2.2, Traffic at Local Intersections, Presidio traffic would contribute less than two percent of total peak hour volumes at the intersection of California Street/Park Presidio Boulevard in the future under all PHSH alternatives.

In general, pedestrian safety is not only a function of the volume of vehicular traffic on the street, but also the adequacy of pedestrian facilities in separating pedestrian traffic from vehicular traffic. The areas of the Richmond district that would experience the most project-generated traffic are 14<sup>th</sup> and 15<sup>th</sup> Avenues north of Lake Street. Both of these streets have sidewalks and street trees that separate the sidewalks from the roadway. These streets also have on-street parking, which is also considered an element of the streetscape that buffers pedestrians from traffic. The sidewalks on these streets provide access to the PHSH district, and implementation of the Presidio Trails and Bikeways Master Plan in the PHSH district will provide a safe and continuous network of paths and bikeways that offer access to the rest of the Presidio, as well as Mountain Lake Park. For instance, connecting the proposed pedestrian trail and bikeway on the west side of PHSH district to Park Boulevard on the east side of the PHSH district with a multi-use trail around the southern edge of the district will provide a safe, continuous route to Mountain Lake that is grade-separated from Highway 1 and avoids conflicts with vehicular traffic on city streets.

Implementation of the Park Presidio Boulevard Access Variant would improve pedestrian and bicycle safety at the intersection of Lake Street/Park Presidio Boulevard because the new intersection on Park Presidio Boulevard would replace the Lake Street intersection as the first intersection encountered by southbound traffic on Highway 1. Pedestrians and bicyclists would be prohibited from using the new intersection on Park Presidio Boulevard, but would be directed to the multi-use trail that is grade-separated from Highway 1, or to Lake Street, which is a City-designated bike route.

#### **3.2.2.5 Transit**

Land uses associated with the PHSH alternatives would generate transit trips for several Bay Area transit providers, and would most affect the three transit providers that directly serve the project site: MUNI,

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<sup>12</sup> The Trust obtained five years of accident data from the Statewide Integrated Traffic Records System (SWITRS) through the San Francisco Department of Parking and Traffic in conjunction with studying the Park Presidio Boulevard Access Variant. These data are available for review at the Presidio Trust Library, 34 Graham Street, at the Presidio.

Golden Gate Transit (GGT), and the Presidio’s internal shuttle (PresidiGo). Transit trips to and from the project site were estimated based on the expected mode split discussed in Section 3.2.2.1, Travel Demand, and then assigned to transit routes based on the geographic distribution of origins and destinations. Because some transit passengers may use more than one transit mode (e.g., transfer from MUNI to PresidiGo), the sum of transit trips for each transit provider may exceed the total number of transit passengers generated by each alternative. Table 14 summarizes the expected AM peak hour and PM peak hour transit trips to and from the project site by transit service provider for each alternative. More detailed transit ridership estimates are available in Appendix B.

Table 14. Peak Hour Transit Trips to/from Project Site by Service Provider and Alternative

TIME PERIOD & SERVICE PROVIDER	REQUESTED NO ACTION ALTERNATIVE	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4
<b>AM Peak Hour</b>					
MUNI	40	95	61	43	30
Golden Gate Transit	4	10	6	5	3
PresidiGo	16	46	19	14	11
<b>PM Peak Hour</b>					
MUNI	44	175	70	51	36
Golden Gate Transit	5	19	7	5	4
PresidiGo	18	80	23	17	15

Source: Wilbur Smith Associates 2004.

**Requested No Action Alternative** – The Requested No Action Alternative would generate 304 daily transit trips, including 47 AM peak hour transit trips and 52 PM peak hour transit trips. If MUNI does not provide additional capacity for Routes 1, 1AX, and 1BX on California Street by 2020, the cumulative ridership due to regional growth trends and implementation of the PTMP could exceed capacity on one or more of these three routes in the inbound (toward downtown) direction in the AM peak hour. However, the Presidio as a whole is expected to contribute only two percent or less to the total projected 2020 ridership on these routes. In the PM peak hour, cumulative ridership on MUNI Route 28 could exceed capacity if additional capacity is not added to this route. In the southbound direction, projected ridership on MUNI Route 28 is expected to exceed capacity without ridership generated by the Presidio. The maximum load point for MUNI Route 28 occurs south of Golden Gate Park, and many passengers

traveling to and from the Presidio are expected to board or alight the bus at a considerable distance from the maximum load point.

GGT Route 10<sup>13</sup> is the Golden Gate Transit route that directly serves the project site. Ridership on this route would near capacity in the PM peak hour in the southbound direction if capacity is not increased beyond the current level.

Mitigation called for in the PTMP EIS, including increased frequency on MUNI lines, PresidiGo service, and monitoring of GGT routes and coordination with GGT, would reduce the effects of the Requested No Action Alternative on transit service.

**Alternative 1: PTMP Alternative** – Alternative 1 would generate 1,562 daily transit trips, or about five times that of the Requested No Action Alternative. The alternative would generate 120 transit trips in the AM peak hour, or about 2.5 times the number of AM peak hour transit trips as the Requested No Action Alternative, and 219 transit trips in the PM peak hour, or about four times the number of PM peak hour transit trips as the Requested No Action Alternative. Similar to the Requested No Action Alternative, if MUNI does not provide additional capacity for Routes 1, 1AX, and 1BX on California Street in the AM peak hour and for Route 28 in the PM peak hour by 2020, the cumulative ridership could exceed capacity. Ridership on GGT Route 10<sup>14</sup> could slightly exceed capacity in the PM peak hour in the southbound direction if capacity is not increased beyond the current level. The Presidio is expected to contribute about 10 percent to the total PM peak hour projected ridership on this route in 2020. Mitigation called for in the PTMP EIS, including increased frequency on MUNI lines, PresidiGo service, and monitoring of GGT routes, would reduce the effects of Alternative 1 on transit service.

**Alternative 2: Infill Alternative** – Alternative 2 would generate 701 daily transit trips, or more than twice that generated by the Requested No Action Alternative but 55 percent fewer than would be generated by Alternative 1. In the AM peak hour, Alternative 2 would generate 69 transit trips, or about 47 percent more than the Requested No Action Alternative but 43 percent fewer than Alternative 1. In the PM peak hour, Alternative 2 would generate 80 transit trips, or about 54 percent more than the Requested No Action Alternative but 63 percent fewer than Alternative 1. Alternative 2 is expected to result in 53 percent and 59 percent more MUNI ridership in 2020 than the Requested No Action Alternative in the AM and PM peak hours, respectively, but about 36 percent and 60 percent less than Alternative 1 in the AM and PM peak hours, respectively. Alternative 2 would result in just slightly higher ridership on Golden Gate Transit than the Requested No Action Alternative. Mitigation called for in the PTMP EIS, including increased frequency on MUNI lines, PresidiGo service, and monitoring of GGT routes, would reduce the effects of Alternative 2 on transit service.

**Alternative 3: No Infill Alternative** – Alternative 3 would generate 496 daily transit trips, or 63 percent more than the Requested No Action Alternative, 68 percent fewer than Alternative 1, and 29 percent fewer than Alternative 2. In the AM peak hour, Alternative 3 would generate 50 transit trips, or 6 percent

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<sup>13</sup> Ridership data presented are for GGT Route 50. GGT Route 50 no longer exists, but GGT Route 10 follows the same alignment in San Francisco. Ridership data for GGT Route 10 are not yet available.

more than the Requested No Action Alternative, 58 percent fewer than Alternative 1, and 28 percent fewer than Alternative 2. In the PM peak hour, Alternative 3 would generate 59 transit trips, or 13 percent more than the Requested No Action Alternative, 73 percent fewer than Alternative 1, and 26 percent fewer than Alternative 2.

Compared to the Requested No Action Alternative, Alternative 3 is expected to result in 8 percent and 16 percent more MUNI ridership in the AM and PM peak hours, respectively. Alternative 3 would generate 55 to 71 percent less MUNI ridership in the AM and PM peak hours, respectively, than Alternative 1, and 27 to 30 percent less than Alternative 2. Alternative 3 would result in about the same peak hour ridership on Golden Gate Transit as the Requested No Action Alternative, less than half the ridership in Alternative 1, and slightly less ridership than Alternative 2. Mitigation called for in the PTMP EIS, including increased frequency on MUNI lines, PresidiGo service, and monitoring of GGT routes, would reduce the effects of Alternative 3 on transit service.

**Alternative 4: Battery Caulfield Alternative** – On a daily basis, Alternative 4 would generate the fewest daily transit trips of all alternatives except the Requested No Action Alternative. Alternative 4 would generate 427 daily transit trips, or 40 percent more than the Requested No Action Alternative, 73 percent fewer than Alternative 1, 39 percent fewer than Alternative 2, and 14 percent fewer than Alternative 3. In the AM peak hour, Alternative 4 would generate the fewest transit trips of all alternatives, including the Requested No Action Alternative. Alternative 4 would generate 36 AM peak hour transit trips, or 23 percent fewer than the Requested No Action Alternative, 70 percent fewer than Alternative 1, 48 percent fewer than Alternative 2, and 28 percent fewer than Alternative 3. Alternative 4 would also generate the fewest transit trips of all alternatives in the PM peak hour. Alternative 4 would generate 44 PM peak hour transit trips, or 15 percent fewer than the Requested No Action Alternative, 80 percent fewer than Alternative 1, 45 percent fewer than Alternative 2, and 25 percent fewer than Alternative 3.

Compared to the Requested No Action Alternative, Alternative 4 is expected to result in 25 percent and 18 percent less MUNI ridership in the AM and PM peak hours, respectively. Alternative 4 would result in 68 to 79 percent less MUNI ridership than Alternative 1, about half that of Alternative 2, and about 30 percent less MUNI ridership than Alternative 3. On Golden Gate Transit in 2020, Alternative 4 is expected to result in slightly less ridership than the Requested No Action Alternative and Alternative 3, much less than Alternative 1, and about half that of Alternative 2.

Mitigation called for in the PTMP EIS, including increased frequency on MUNI lines, PresidiGo service, and monitoring of GGT routes, would reduce the effects of Alternative 4 on transit service.

### **3.2.2.6 Pedestrians and Bicycles**

The number of person trips to and from the project site expected to be made by bicycling, walking, or some other mode was calculated assuming the mode split discussed in Section 3.2.2.1, Travel Demand.

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<sup>14</sup> See footnote 13.

All of the alternatives assume improvements to the pedestrian and bicycle circulation network consistent with the Presidio Trails and Bikeways Master Plan (see Figure 11). In the vicinity of the project site, the Presidio Trails and Bikeways Master Plan would provide a multi-use path that would extend from Battery Caulfield Road on the west side of the site around the south side of the site to connect with Park Boulevard, which is an existing multi-use path that continues under Highway 1 to the Mountain Lake area. The Master Plan would also provide an uphill bike lane on Wedemeyer Street/Battery Caulfield Road between 15<sup>th</sup> Avenue and Washington Boulevard, a pedestrian path in the Wedemeyer Street/Battery Caulfield corridor, and pedestrian paths that connect the project site to Lobos Creek and the Baker Beach Apartments.

**Requested No Action Alternative** – The cultural/educational, office and industrial/warehouse uses associated with the Requested No Action Alternative would generate approximately 204 daily pedestrian or bicycle trips. This expected level of pedestrian and bicycle activity would be accommodated by San Francisco’s network of bike lanes and sidewalks, and by trails and bikeways planned as part of the Presidio Trails and Bikeways Master Plan.

**Alternative 1: PTMP Alternative** – Alternative 1 would generate 1,506 daily pedestrian or bicycle trips, or about seven times the number generated by the Requested No Action Alternative. Alternative 1 would generate 107 pedestrian or bicycle trips in the AM peak hour, or about 3.5 times more than the Requested No Action Alternative, and 207 pedestrian or bicycle trips in the PM peak hour, about six times the number expected from the Requested No Action Alternative. The expected level of pedestrian and bicycle activity under Alternative 1 would be accommodated by the City’s bike lanes and sidewalks, and by the bicycle and pedestrian network planned as part of the Presidio Trails and Bikeways Master Plan.

**Alternative 2: Infill Alternative** – Alternative 2 would generate 658 daily pedestrian or bicycle trips, or more than three times the number generated by the Requested No Action Alternative and 56 percent fewer than Alternative 1. In the AM peak hour, Alternative 2 would generate 63 pedestrian or bicycle trips, or about twice that generated by the Requested No Action Alternative, but 41 percent fewer than Alternative 1. In the PM peak hour, Alternative 2 would generate 73 pedestrian or bicycle trips, or more than twice that generated by the Requested No Action Alternative but 65 percent fewer than Alternative 1. Since Alternative 2 would generate fewer bicycle and pedestrian trips than Alternative 1, the expected level of pedestrian and bicycle activity with Alternative 2 could be accommodated by San Francisco’s bike lanes and sidewalks, and by the bicycle and pedestrian network planned as part of the Presidio Trails and Bikeways Master Plan.

**Alternative 3: No Infill Alternative** – Alternative 3 would generate 460 daily pedestrian or bicycle trips, or more than twice the number generated by the Requested No Action Alternative, 69 percent fewer than Alternative 1, and 30 percent fewer than Alternative 2. In the AM peak hour, Alternative 3 would generate 45 pedestrian or bicycle trips, or 45 percent more than the Requested No Action Alternative, 58 percent fewer than Alternative 1, and 29 percent fewer than Alternative 2. In the PM peak hour, Alternative 3 would generate 53 pedestrian or bicycle trips, or 56 percent more than the Requested No Action Alternative, 74 percent fewer than Alternative 1, and 27 percent fewer than Alternative 2. The expected level of pedestrian and bicycle activity with Alternative 3 would be accommodated within San

Francisco's bike lanes and sidewalks, and by the bicycle and pedestrian network planned as part of the Presidio Trails and Bikeways Master Plan.

**Alternative 4: Battery Caulfield Alternative** – Alternative 4 would generate 410 daily pedestrian or bicycle trips, or about twice the number generated by the Requested No Action Alternative, 73 percent fewer than Alternative 1, 38 percent fewer than Alternative 2, and 11 percent fewer than Alternative 3. In the AM peak hour, Alternative 4 would generate 32 pedestrian or bicycle trips, or slightly more than the Requested No Action Alternative, 70 percent fewer than Alternative 1, 49 percent fewer than Alternative 2, and 29 percent fewer than Alternative 3. In the PM peak hour, Alternative 4 would generate 40 pedestrian or bicycle trips, or 18 percent more than the Requested No Action Alternative, 81 percent fewer than Alternative 1, 45 percent fewer than Alternative 2, and 25 percent fewer than Alternative 3. The expected level of pedestrian and bicycle activity with Alternative 4 would be accommodated within San Francisco's bike lanes and sidewalks, and by the bicycle and pedestrian network planned as part of the Presidio Trails and Bikeways Master Plan.

**Park Presidio Boulevard Access Variant** – In combination with Alternatives 1, 2, 3, or 4, the proposed access to Park Presidio Boulevard would improve pedestrian and bicycle safety when compared to existing conditions. By providing for an intersection north of the intersection of Lake Street/Park Presidio Boulevard, the variant would slow southbound traffic before it reaches the crosswalk and designated bicycle route on Lake Street.

### 3.2.2.7 Parking

The average parking demand generated by the five land use alternatives has been estimated for the midday weekday, evening, and weekend conditions, based on the methodology used in the PTMP EIS. Parking demand consists of both long-term demand (i.e., employee and resident parking) and short-term demand (i.e., visitor parking). Consistent with the methodology outlined in the San Francisco Planning Department's Transportation Impact Analysis Guidelines (City and County of San Francisco 2002b), long-term parking for non-residential land uses was estimated by determining the number of employees for each land use and applying the average mode split and vehicle occupancy from the trip generation estimates for both external and internal trips. Each employee vehicle trip was assumed to require one space per day. A long-term rate of 1.13 to 1.32 spaces per dwelling unit was used for standard residential units (depending on the mix of unit types/sizes for each alternative), based on rates from the San Francisco Planning Department's Transportation Impact Analysis Guidelines and the Institute of Transportation Engineers' Parking Generation Manual, Second Edition. A rate of 0.27 space per dwelling unit was used for all senior housing, based on the Institute of Transportation Engineers' Parking Generation Manual, Second Edition.

Like the methodology used for long-term parking, the methodology for estimating short-term parking demand is also consistent with the methodology outlined in the San Francisco Planning Department's Transportation Impact Analysis Guidelines. Short-term parking was estimated based on the total daily visitor trips and the average turnover rate. A short-term parking turnover rate of six vehicles per space per day was applied to industrial/warehousing and office uses, ten vehicles per space per day was used for

cultural/educational uses, and three vehicles per space per day was used for conference uses. Table 15 presents the estimated weekday midday, evening, and weekend parking demand for all alternatives. Detailed parking demand calculations by alternative are provided in Appendix B.

Table 15. Parking Demand (Spaces) by Time of Day and Alternative

TIME PERIOD	REQUESTED NO ACTION ALTERNATIVE	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4
<b>Upper Plateau</b>					
Weekday Midday	22	32	13	18	53
Weekday Evening	1	8	19	1	104
Weekend	2	11	20	2	105
Peak Period Demand	22	32	20	18	105
Proposed Supply	30	32	21	18	107
Surplus / (Deficit)	8	0	1	0	2
<b>Lower Plateau</b>					
Weekday Midday	122	408	252	181	91
Weekday Evening	64	409	426	296	113
Weekend	88	490	433	302	123
Peak Period Demand	122	490	433	302	123
Proposed Supply	234	515	454	312	126
Surplus / (Deficit)	112	25	21	10	3

Source: Wilbur Smith Associates 2004.

Table 15 presents a comparison of peak period parking demand to parking supply for each alternative. Other than the Requested No Action Alternative, Alternative 4 would generate the lowest overall parking demand because of the senior housing component, which would generate relatively low parking demand compared to other uses. On the lower plateau, peak period parking demand for Alternative 1 would be about four times that for the Requested No Action Alternative, peak period demand for Alternative 2 would be more than three times that for the Requested No Action Alternative, peak period demand for Alternative 3 would be more than twice that of the Requested No Action Alternative, and the peak period demand for Alternative 4 would be about the same as that for the Requested No Action Alternative. On the upper plateau, the parking demand for Alternative 1 would be about ten spaces more than the

Requested No Action Alternative, while Alternatives 2 and 3 would have a parking demand similar to the Requested No Action Alternative and the peak period parking demand for Alternative 4 would be about five times that for the Requested No Action Alternative.

**Requested No Action Alternative** – Under the Requested No Action Alternative, a total of 234 spaces would be provided. The 30 parking spaces surrounding Buildings 1450, 1818, and 1819 would remain, but the existing 306 parking spaces on the lower plateau would be reduced by approximately 72 spaces due to reconfiguration of the largest parking area following remediation of Landfill 10 (see Section 2.2). Due to the relatively low parking demand associated with the educational and industrial/warehouse uses currently in the PSHS district, the Requested No Action Alternative would generate an estimated parking demand of 144 spaces on weekdays, including 22 spaces on the upper plateau and 122 spaces on the lower plateau. There would be a large surplus (113 spaces) over demand.

**Alternative 1: PTMP Alternative** – According to the Final Plan Alternative described in the PTMP, the PSHS district was estimated to have a demand of 674 spaces, and therefore was proposed to have a parking supply of 708 spaces. The parking demand calculation assumptions for residential uses in the PTMP EIS were intended to reflect the wide range of types and sizes of residential units throughout the Presidio. The parking demand assumptions used for the calculations in the PTMP EIS have been refined for the purposes of this site-specific study, and consequently the peak period parking demand for the entire PSHS district under Alternative 1 is estimated to be much lower (501 spaces), although the peak period parking demand would occur on weekdays on the upper plateau and on weekends on the lower plateau. The parking supply of 708 parking spaces called for in the PTMP would far exceed the peak period demand, thus allowing for a reduction in this proposed parking supply to 547 parking spaces, consisting of 32 spaces on the upper plateau and 515 spaces on the lower plateau. (This supply would represent an increase over the 306 spaces currently located on the lower plateau.) Due to full occupancy of the site and the relatively low parking demand associated with the educational uses currently on the PSHS site, the peak period parking demand for Alternative 1 would be more than three times that estimated for the Requested No Action Alternative on the lower plateau.

**Alternative 2: Infill Alternative** – There are currently approximately 306 parking spaces on the lower plateau of the project site. Alternative 2 would increase the number of spaces on the lower plateau to 454, but 91 of these spaces would be underground or under buildings, leaving 363 surface parking spaces – a 19-percent increase from the 306 surface parking spaces currently on the lower plateau.

Alternative 2 is expected to have a peak period demand of 453 spaces, consisting of 433 spaces on the lower plateau and 20 spaces on the upper plateau. The peak period parking demand on the lower plateau for Alternative 2 would be more than three times that of the Requested No Action Alternative, but about 12 percent less than Alternative 1. The proposed supply of 475 spaces would consist of 454 spaces on the lower plateau and 21 spaces on the upper plateau. This supply would accommodate the estimated demand and allow 21 additional spaces on the lower plateau for drivers circulating to find parking spaces during peak periods.

**Alternative 3: No Infill Alternative** – Alternative 3 is expected to have a peak period demand of 302 spaces on the lower plateau and 18 spaces on the upper plateau. The parking demand on the lower plateau for Alternative 3 would be about 2.5 times that for the Requested No Action Alternative, about 38 percent less than Alternative 1, and about 30 percent less than Alternative 2. The proposed supply of 330 spaces would consist of 18 spaces on the upper plateau and 312 spaces on the lower plateau, and would adequately accommodate the estimated demand with about 10 additional spaces on the lower plateau for drivers circulating to find parking spaces.

**Alternative 4: Battery Caulfield Alternative** – Alternative 4 would generate the least overall parking demand except for the Requested No Action Alternative, with a weekend demand for about 228 spaces in 2020, including 105 spaces on the upper plateau and 123 spaces on the lower plateau. The relatively low demand compared to other alternatives is attributable to low parking demand associated with the senior housing component. On the lower plateau, Alternative 4 would generate about the same demand as the Requested No Action Alternative, about one-fourth that of Alternative 1, about 72 percent less than Alternative 2, and about 59 percent less than Alternative 3. On the upper plateau, Alternative 4 would generate 3.2 to 5.8 times the demand generated by the other alternatives. The proposed total supply of 233 spaces would accommodate the expected demand, and would allow 2 and 3 additional spaces on the upper and lower plateaus, respectively, for drivers circulating trying to find parking spaces.

### **3.2.2.8 Construction Traffic**

Construction activities would include reconstruction and renovation of existing buildings, structural improvements and other seismic work, utility upgrades, and other infrastructure improvements. Construction traffic would include trucks hauling away construction debris and delivering construction materials, as well as traffic created by the construction workers. The volume of daily construction traffic would vary by alternative, depending on the extent of demolition and new construction and the duration of the construction project.

Construction traffic associated with Alternatives 1, 2, 3, or 4 could occur at the same time as remediation activities for Landfill 10 on the west side of the PHS district or at Landfill 8 in the north part of the PHS district. Remediation activities are discussed in more detail in Section 2.2.1, and the potential cumulative impacts of truck traffic generated by remediation activities and truck traffic associated with Alternative 1, 2, 3, or 4 are discussed in Section 3.2.2.8.

Table 16 provides a comparison of the construction and demolition characteristics that would determine the amount of construction-related traffic generated by each alternative.

**Requested No Action Alternative** – Under the Requested No Action Alternative, no additional buildings on the PHS site would be rehabilitated for occupancy, so there would be no anticipated major demolition or construction activity in the PHS district. The only truck trips to and from the PHS district would be associated with remediation of Landfills 8 and 10, and a modest number associated with “mothballing” vacant buildings to protect them from further deterioration.

Table 16. Comparison of Construction and Demolition Activities

	REQUESTED NO ACTION ALTERNATIVE	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4
Maximum demolition (sf)	0	–	48,000	125,000	116,000
Maximum new construction (sf)	0	–	48,000	–	73,000
Average number of daily one-way truck trips	0	6	11-15	9	10
Duration of construction/demolition (months)	NA	20-22	22-24	17	20

Source: Presidio Trust 2004.

NA: not applicable

sf: square feet

**Alternative 1: PTMP Alternative** – There would be no demolition or new construction with Alternative 1. Construction vehicles associated with building rehabilitation would reach the Presidio and project site via several routes, including the Golden Gate Bridge Plaza and the slip ramp from Richardson Avenue (construction of which is expected to be complete in 2004). Construction routes through the 14<sup>th</sup> and 15<sup>th</sup> Avenue Gates would be minimized.

Construction-related traffic, especially larger construction vehicles, could create some conflicts with local and regional traffic. However, because construction vehicles traveling to and from the project site would use various gates to enter/exit the Presidio and would be dispersed throughout the Bay Area, the vehicle trips on regional roadways would generally fall within the normal fluctuations in traffic volume. A Construction Traffic Management Plan would be developed to provide specific routes and other measures to minimize potential traffic impacts, particularly for the residential Lake Street neighborhood immediately south of the project site.

**Alternative 2: Infill Alternative** – Alternative 2 would result in a maximum of 48,000 gross square feet of demolition and no more than 48,000 gross square feet of new construction. Because Alternative 2 would involve demolition and new construction, Alternative 2 would also likely result in more construction-related traffic to and from the site than Alternative 1. In addition, Alternative 2 would include underground parking. Construction traffic related to excavation for and construction of underground parking would account for about 40 to 50 percent of the estimated truck trips associated with Alternative 2. Overall, Alternative 2 is expected to generate two to three times the number of construction truck trips to and from the project site than Alternative 1, corresponding to an average of 11 to 15 one-way truck trips per day compared to the estimated six one-way truck trips expected under Alternative 1. Although Alternative 2 would generate considerably more construction-related traffic than Alternative 1, this traffic could be controlled through a Construction Traffic Management Plan, which

would specify routes and other measures to minimize potential traffic impacts, particularly for the residential Lake Street neighborhood immediately south of the project site.

**Alternative 3: No Infill Alternative** – Alternative 3 would result in 125,000 gross square feet of demolition and no new construction. Alternative 3 would involve substantially more demolition than Alternative 1, likely resulting in more truck trips to and from the site than with Alternative 1. Because Alternative 3 would not include underground parking, it would generate fewer truck trips than Alternative 2. Overall, Alternative 3 would generate approximately 4,200 one-way truck trips, or about 62 percent more than the 2,600 one-way truck trips expected to be generated by Alternative 1. The construction period would likely be similar to or slightly shorter than that for Alternative 1, and five to seven months shorter than that for Alternative 2. Alternative 3 would generate about nine one-way truck trips per day on average, compared to the six one-way truck trips per day expected with Alternative 1 and the 11 to 15 one-way truck trips expected with Alternative 2. The construction-related traffic generated by Alternative 3 could be controlled through a Construction Traffic Management Plan, which would provide specific routes and other measures to minimize potential traffic impacts, particularly for the residential Lake Street neighborhood immediately south of the project site.

**Alternative 4: Battery Caulfield Alternative** – Alternative 4 would result in approximately 116,000 gross square feet of demolition and no more than 73,000 gross square feet of new construction. Although Alternative 4 would involve demolition and new construction activities and Alternative 1 would not, Alternative 4 would allow less overall building square footage on the project site. During the construction period of approximately 20 months, Alternative 4 would generate about ten one-way truck trips per day on average, compared to the six one-way truck trips expected with Alternative 1, the 11 to 15 expected with Alternative 2, and the nine expected with Alternative 3. This number of truck trips and the traffic that would be generated by construction workers could be controlled through a Construction Traffic Management Plan, which would provide specific routes and other measures to minimize potential traffic impacts, particularly for the residential Lake Street neighborhood immediately south of the project site.

**Park Presidio Boulevard Access Variant** – Construction of a new intersection on Park Presidio Boulevard north of Lake Street would require site grading, and could involve the import or export of limited quantities of soil and other materials. Construction workers would also travel to and from the site. Associated construction traffic could be controlled through a Construction Traffic Management Plan, which would provide specific routes and other measures to minimize potential traffic impacts on the Presidio and on the residential Lake Street neighborhood immediately south of the project site. Construction activities associated with the variant would require approval from Caltrans, and the Trust would follow Caltrans standards regarding lane closures and other construction traffic management strategies to minimize inconveniences to motorists on the state highway.

### **3.2.2.9 Cumulative Effects**

The analysis of year 2020 traffic conditions presented in Section 3.2.2.2 above includes increases in traffic volumes resulting from implementation of the PTMP (including the PHS district), when

combined with traffic volumes associated with the population and employment growth projected to occur in the rest of the Bay Area region. Similarly, the analysis of year 2020 transit ridership presented earlier includes transit ridership attributable to the PTMP (including the PHSB district) and ridership projected as a result of Bay Area regional population and employment trends. Thus, the above analysis of Alternative 1, the PTMP Alternative, updates the cumulative transportation analysis presented in the PTMP EIS and fully describes the maximum potential cumulative impacts of the proposed action. (Under Alternatives 2, 3, and 4, the PHSB district's contribution to 2020 peak hour traffic volumes on nearby streets would be less than described for Alternative 1.) A summary of conclusions garnered from the above analysis of potential cumulative effects is presented by alternative below, along with information about other potential cumulative transportation-related effects.

**Requested No Action Alternative** – Motorists would experience unacceptable levels of delay, expressed as a degradation in the peak hour level of service (LOS) at a number of locations when compared to existing conditions if traffic associated with the Requested No Action Alternative is combined with traffic anticipated as a result of future increases in employment and population in the region. Specifically, as demonstrated by comparing Table 7 to Tables 11 and 12, the intersections of Lake Street/15<sup>th</sup> Avenue, Lake Street/14<sup>th</sup> Avenue, and California Street/14<sup>th</sup> Avenue would all degrade from LOS C or D to LOS E in the AM peak hour, and the intersections of Lake Street/15<sup>th</sup> Avenue, California Street/15<sup>th</sup> Avenue, California Street/Park Presidio Boulevard, and Lake Street/Funston Avenue would all degrade from LOS D or better to LOS E or F in the PM peak hour.

The degradation of the LOS at the all-way stop-controlled intersection of Lake Street/15<sup>th</sup> Avenue is considered a project-specific impact because it would only occur in the Requested No Action Alternative, which does not assume operation of 14<sup>th</sup> and 15<sup>th</sup> Avenues as a one-way couplet. The degradation of LOS at the signalized intersection of California/Park Presidio Boulevard is considered cumulatively significant and unmitigable. The Presidio's contribution to this impact has been calculated at less than two percent. The degradation of LOS projected at two-way stop-controlled intersections is not always considered significant, as discussed in footnote 8 in Section 3.2.1.2 above mitigation measures are identified in each instance, however, and these could be implemented by the City if the City deems them warranted.

Transit ridership under the Requested No Action Alternative would contribute about one percent to the cumulative ridership expected on the California Street line (1, 1AX, and 1BX), which would exceed its AM peak hour capacity in the future if MUNI does not provide additional capacity. Mitigation is identified to address this potentially significant cumulative effect, as well as potential capacity issues identified for the MUNI Route 28 and Golden Gate Transit Route 10.

The analysis has not identified any cumulative impacts related to pedestrians, bicycles, or other transportation issues to which the Requested No Action Alternative would contribute. Also, no demolition or construction would occur, eliminating any potential for contributions to cumulative construction traffic impacts.

**Alternative 1: PTMP Alternative** – Motorists would experience unacceptable levels of delay, expressed as a degradation in the peak hour level of service (LOS) at a number of locations when compared to

existing conditions if traffic associated with Alternative 1 (without the Park Presidio Boulevard Access Variant) is combined with traffic anticipated as a result of future increases in employment and population in the region. Specifically, as demonstrated by comparing Table 7 to Tables 11 and 12, the intersections of Lake Street/14<sup>th</sup> Avenue and California Street/14<sup>th</sup> Avenue would degrade from LOS D to LOS F in the AM peak hour, and the intersections of California Street/15<sup>th</sup> Avenue, California Street/Park Presidio Boulevard, and Lake Street/Funston Avenue would all degrade from LOS D or better to LOS E or F in the PM peak hour. These cumulative impacts would occur whether or not the proposed action is implemented, as demonstrated by the analysis of the Requested No Action Alternative above.

When combined with the Park Presidio Boulevard Access Variant and regional traffic growth, Alternative 1 would also result in a degradation of the AM peak hour LOS at California Street/15<sup>th</sup> Avenue to LOS E and a degradation of the PM peak hour level of service at Lake Street/Park Presidio Boulevard to LOS E. This combination would also improve the projected PM peak hour level of service at Lake Street/Funston Avenue.

The degradation of the level of service at the signalized intersection of California Street/Park Presidio Boulevard is considered cumulatively significant and unmitigable, but the Presidio's contribution to this impact has been calculated at less than two percent. The degradation of level of service at the signalized intersection of Lake Street/Park Presidio Boulevard with the variant is also considered cumulatively significant, but a related mitigation measure has been identified. The degradation of level of service projected at the other two-way stop-controlled intersections, is not always considered significant, as discussed in footnote 8 in Section 3.2.1.2, above; mitigation measures are identified in each instance, however, and these could be implemented by the City if the City deems them warranted.

Transit ridership associated with Alternative 1 would contribute 9 and 15 percent of the cumulative increase in ridership expected on MUNI lines serving the PHS district between 2001 and 2020 in the AM and PM peak hours, respectively. If MUNI does not provide additional peak hour capacity, future ridership the California Street line (1, 1AX, and 1BX) would exceed its AM peak hour capacity and future ridership on MUNI Route 28 would exceed its capacity in the PM peak hour. Mitigation is identified to address this potentially significant cumulative effect, as well as potential capacity issues identified for Golden Gate Transit Route 10.

The analysis has not identified any cumulative impacts related to pedestrians, bicycles, or other transportation issues to which Alternative 1 would contribute. Also, no demolition or construction would occur, essentially eliminating the potential for significant contributions to cumulative construction traffic impacts.

**Alternative 2: Infill Alternative** – Motorists would experience unacceptable levels of delay, expressed as a degradation in the peak hour level of service (LOS) at a number of locations when compared to existing conditions if traffic associated with Alternative 2 (with or without the Park Presidio Boulevard Access Variant) is combined with traffic anticipated as a result of future increases in employment and population in the region. Specifically, as demonstrated by comparing Table 7 to Tables 11 and 12, the intersections of Lake Street/14<sup>th</sup> Avenue and California Street/14<sup>th</sup> Avenue would degrade from LOS D to

LOS E or F in the AM peak hour, and the intersections of California Street/15<sup>th</sup> Avenue, California Street/Park Presidio Boulevard, and Lake Street/Funston Avenue would all degrade from LOS D or better to LOS E in the PM peak hour (except that Lake Street/Funston Avenue would not degrade if the Park Presidio Boulevard Access Variant is implemented). These impacts would occur whether or not the proposed action is implemented, as demonstrated by the analysis of the Requested No Action Alternative above.

The degradation of the level of service at the signalized intersection of California Street/Park Presidio Boulevard is considered cumulatively significant and unmitigable, but the Presidio's contribution to this impact has been calculated at less than two percent. The degradation of level of service projected at the other two-way stop-controlled intersections, is not always considered significant, as discussed in footnote 8 in Section 3.2.1.2 above; mitigation measures are identified in each instance, however, and these could be implemented by the City if the City deems them warranted.

Transit ridership associated with Alternative 2 would contribute six percent of the cumulative increase in ridership between 2001 and 2020 expected on MUNI lines serving the PHSB district in both the AM and PM peak hours. As under Alternative 1, if MUNI does not provide additional peak hour capacity, future ridership the California Street line (1, 1AX, and 1BX) would exceed its AM peak hour capacity and future ridership on MUNI Route 28 would exceed its capacity in the PM peak hour. Mitigation is identified to address this potentially significant cumulative effect, as well as potential capacity issues identified for Golden Gate Transit Route 10.

The analysis has not identified any cumulative impacts related to pedestrians, bicycles, or other transportation issues to which Alternative 2 would contribute.

Cumulative construction-related traffic effects could occur as a result of remediation activities that would likely occur during construction, demolition, and rehabilitation of the PHSB district. Landfill 10 in the western portion of the PHSB district and Landfill 8 in the northern portion of the PHSB district on the upper plateau are scheduled for remediation in late 2005 and 2006. Landfill 10 is expected to require approximately 10,000 cubic yards of soil to be hauled away from the site, and Landfill 8 is expected to require about 15,000 cubic yards of soil to be off-hauled. Remediation of Landfills 8 and 10 is expected to take approximately eight weeks each, but remediation of these landfills would not occur simultaneously. If remediation of Landfill 8 were to occur at the same time as demolition and construction activities associated with the reuse of the PHSB district buildings, an additional 47 daily one-way truck trips would be traveling to the PHSB district. Similar to the impacts of the construction-related truck trips associated with the PHSB district alternatives, the potential impacts of the remediation activities would be avoided by identifying specific routes and other measures to minimize potential traffic impacts, particularly for the residential Lake Street neighborhood immediately south of the project site. The Construction Traffic Management Plan for the selected PHSB alternative would be closely coordinated with the management strategies for the remediation of Landfills 8 and 10 to minimize cumulative impacts. The dredging of Mountain Lake is currently expected to occur in 2007 or 2008, and is preliminarily estimated to result in about 750 one-way truck trips to and from Mountain Lake. The dredging is expected to occur over approximately three to four months, resulting in an estimated 8 to 12

daily one-way truck trips. Truck traffic associated with the Mountain Lake dredging activities could also overlap with construction traffic associated with Alternative 2, but is not expected to overlap with truck traffic associated with remediation of Landfill 8 or 10.

**Alternative 3: No Infill Alternative** – Motorists would experience unacceptable levels of delay, expressed as a degradation in the peak hour level of service (LOS) at a number of locations when compared to existing conditions if traffic associated with Alternative 3 (with or without the Park Presidio Boulevard Access Variant) is combined with traffic anticipated as a result of future increases in employment and population in the region. Specifically, as demonstrated by comparing Table 7 to Tables 11 and 12, the intersections of Lake Street/14<sup>th</sup> Avenue and California Street/14<sup>th</sup> Avenue would degrade from LOS D to LOS E or F in the AM peak hour, and the intersections of California Street/15<sup>th</sup> Avenue, California Street/Park Presidio Boulevard, and Lake Street/Funston Avenue would all degrade from LOS D or better to LOS E or F in the PM peak hour (except that Lake Street/Funston Avenue would not degrade with implementation of the Park Presidio Boulevard Access Variant). These impacts would occur whether or not the proposed action is implemented, as demonstrated by the analysis of the Requested No Action Alternative above.

The degradation of the LOS at the signalized intersection of California/Park Presidio Boulevard is considered cumulatively significant and unmitigable, but the Presidio's contribution to this impact has been calculated at less than two percent. The degradation of LOS projected at the other two-way stop-controlled intersections, is not always considered significant, as discussed in footnote 8 in Section 3.2.1.2 above; mitigation measures are identified in each instance, however, and these could be implemented by the City if the City deems them warranted.

Transit ridership associated with Alternative 3 would contribute four and five percent in the AM and PM peak hours, respectively, to the cumulative increase in ridership between 2001 and 2020 expected on MUNI lines serving the PHSB district. As under Alternatives 1 and 2, if MUNI does not provide additional peak hour capacity, future ridership on the California Street line (1, 1AX, and 1BX) would exceed its AM peak hour capacity and future ridership on MUNI Route 28 would exceed its capacity in the PM peak hour. Mitigation is identified to address this potentially significant cumulative effect, as well as potential capacity issues identified for Golden Gate Transit Route 10.

The analysis has not identified any cumulative impacts related to pedestrians, bicycles, or other transportation issues to which Alternative 3 would contribute.

Cumulative construction-related traffic effects could occur as a result of remediation activities that would likely occur during construction, demolition, and rehabilitation of the PHSB district. Landfill 10 in the western portion of the PHSB district and Landfill 8 in the northern portion of the PHSB district on the upper plateau are scheduled for remediation in late 2005 and 2006. Landfill 10 is expected to require approximately 10,000 cubic yards of soil to be hauled away from the site, and Landfill 8 is expected to require about 15,000 cubic yards of soil to be off-hauled. Remediation of Landfills 8 and 10 is expected to take approximately eight weeks each, but remediation of these landfills would not occur simultaneously. If remediation of Landfill 8 were to occur at the same time as demolition and

construction activities associated with the reuse of the PHSB district buildings, an additional 47 daily one-way truck trips would be traveling to the PHSB district. Similar to the impacts of the construction-related truck trips associated with the PHSB district alternatives, the potential impacts of the remediation activities would be avoided by identifying specific routes and other measures to minimize potential traffic impacts, particularly for the residential Lake Street neighborhood immediately south of the project site. The Construction Traffic Management Plan for the selected PHSB alternative would be closely coordinated with the management strategies for the remediation of Landfills 8 and 10 to minimize cumulative impacts. Similar to Alternative 2, the estimated 8 to 12 daily one-way truck trips associated with the dredging of Mountain Lake (expected for 2007 or 2008) could overlap with construction traffic associated with Alternative 3, but are not expected to overlap with truck traffic associated with remediation of Landfill 8 or 10.

**Alternative 4: Battery Caulfield Alternative** – Motorists would experience unacceptable levels of delay, expressed as a degradation in the peak hour level of service (LOS) at a number of locations when compared to existing conditions if traffic associated with Alternative 4 (with or without the Park Presidio Boulevard Access Variant) is combined with traffic anticipated as a result of future increases in employment and population in the region. Specifically, as demonstrated by comparing Table 7 to Tables 11 and 12, the intersections of Lake Street/14<sup>th</sup> Avenue and California Street/14<sup>th</sup> Avenue would degrade from LOS D to LOS E or F in the AM peak hour, and the intersections of California Street/15<sup>th</sup> Avenue, California Street/Park Presidio Boulevard, and Lake Street/Funston Avenue would all degrade from LOS D or better to LOS E or F in the PM peak hour (except that Lake Street/Funston Avenue would not degrade if the Park Presidio Boulevard Access Variant is implemented). These impacts would occur whether or not the proposed action is implemented, as demonstrated by the analysis of the Requested No Action Alternative above.

The degradation of the level of service at the signalized intersection of California Street/Park Presidio Boulevard is considered cumulatively significant and unmitigable, but the Presidio's contribution to this impact has been calculated at less than two percent. The degradation of level of service projected at the other, two-way stop-controlled intersections, is not always considered significant, as discussed in footnote 8 in Section 3.2.1.2 above; mitigation measures are identified in each instance, however, and these could be implemented by the City if the City deems them warranted.

Transit ridership associated with Alternative 3 would contribute three percent, in both the AM and PM peak hours, to the cumulative increase in ridership between 2001 and 2020 expected on MUNI lines serving the PHSB district. As under Alternatives 1, 2, and 3, if MUNI does not provide additional peak hour capacity, future ridership the California Street line (1, 1AX, and 1BX) would exceed its AM peak hour capacity and future ridership on MUNI Route 28 would exceed its capacity in the PM peak hour. Mitigation is identified to address this potentially significant cumulative effect, as well as potential capacity issues identified for Golden Gate Transit Route 10.

The analysis has not identified any cumulative impacts related to pedestrians, bicycles, or other transportation issues to which Alternative 4 would contribute.

Cumulative construction-related traffic effects could occur as a result of remediation activities that would likely occur during construction, demolition, and rehabilitation of the PSHH district. Landfill 10 in the western portion of the PSHH district and Landfill 8 in the northern portion of the PSHH district on the upper plateau are scheduled for remediation late 2005 and 2006. Landfill 10 is expected to require approximately 10,000 cubic yards of soil to be hauled away from the site, and Landfill 8 is expected to require about 15,000 cubic yards of soil to be off-hauled. Remediation of Landfills 8 and 10 is expected to take approximately eight weeks each, but remediation of these landfills would not occur simultaneously. If remediation of Landfill 8 were to occur at the same time as demolition and construction activities associated with the reuse of the PSHH district buildings, an additional 47 daily one-way truck trips would be traveling to the PSHH district. Similar to the impacts of the construction-related truck trips associated with the PSHH district alternatives, the potential impacts of the remediation activities would be avoided by identifying specific routes and other measures to minimize potential traffic impacts, particularly for the residential Lake Street neighborhood immediately south of the project site. The Construction Traffic Management Plan for the selected PSHH alternative would be closely coordinated with the management strategies for the remediation of Landfills 8 and 10 to minimize cumulative impacts. Similar to Alternatives 2 and 3, the estimated 8 to 12 daily one-way truck trips associated with the dredging of Mountain Lake (expected for 2007 or 2008) could overlap with construction traffic associated with Alternative 4, but are not expected to overlap with truck traffic associated with remediation of Landfill 8 or 10.

### 3.2.3 MITIGATION MEASURES

The signalized intersection of California Street/Park Presidio Boulevard is expected to operate at LOS E in the future whether or not the proposed action proceeds. This is considered a cumulatively significant impact, and could not be mitigated within any of the alternatives. The Presidio as a whole would contribute two percent or less to the total peak hour traffic volumes through this intersection.

Other impacts identified in the preceding section could be mitigated by measures identified below. With the exception of Mitigation Measure TR-26 *Construction Traffic Management Plan* and aspects of Mitigation Measure TR-10/25 and Mitigation Measure TR-28, all measures fall outside the Trust's jurisdiction. Measures affecting two-way stop-controlled intersections should be considered by the City on a case-by-case basis, since they may not be considered significant impacts warranting mitigation (see footnote 8 in Section 3.2.1.2).

The following measures are derived from the PTMP EIS and will apply to all alternatives with and without direct access to Park Presidio Boulevard, unless indicated otherwise.

TR-11 *Lake Street / 14<sup>th</sup> Avenue Intersection Improvements* – If desired prior to the intersection operations deteriorating to LOS E or F, implement right-turn-only restrictions for the minor approaches at the two-way stop-controlled intersection of Lake Street/14<sup>th</sup> Avenue.

TR-15 *California Street / 14<sup>th</sup> Avenue Intersection Improvements* – Prior to the intersection operations deteriorating to LOS E or F, install stop signs on the California Street approaches to this two-way stop-controlled intersection and restripe to add a right-turn lane to the northbound approach. This improvement could require removal of some on-street parking spaces. Installing stop signs on California Street will improve the operation of this intersection to an acceptable level of service, but queues on the westbound approach could potentially extend into the intersection of California Street/ Park Presidio Boulevard. Therefore, if queues on the westbound approach to this intersection are determined to significantly affect the operation of California Street/ Park Presidio Boulevard, a traffic signal may be warranted at the intersection of California Street /14<sup>th</sup> Avenue. A traffic signal at this location will adequately mitigate the operation of the intersection to an acceptable level of service.<sup>15</sup>

TR-22 *TDM Program Monitoring* – The Trust has agreed to implement a TDM program to reduce automobile usage by all tenants, occupants, and visitors as summarized in Section 2.2.5 (also see Appendix D of the PTMP for a full description). The Trust will monitor implementation and effectiveness of the TDM program on an ongoing basis. If the TDM performance standards as described in the PTMP (Appendix D) are not being reached, the Trust will implement more aggressive TDM strategies or intensify components of the existing TDM program, such as requiring tenant participation in more TDM program elements, or implementing more frequent and/or extensive shuttle service.

TR-10 and TR-25 *Transit Service Improvements and Monitoring Program* – The Trust currently monitors MUNI operations and passenger loads within the Presidio. Continued monitoring of MUNI service in the Presidio, and similar monitoring of GGT service at the Presidio, will indicate any capacity problems. If the monitoring were to reveal insufficient capacity for northbound Presidio-generated passengers during the PM peak hour, the Trust will notify MUNI and/or the Golden Gate Bridge Highway and Transportation District of the deficiencies. Transit service providers could then reduce passenger load factors through increased service frequency.

TR-26 *Construction Traffic Management Plan* – During pre-construction activities, the contractor(s) of individual projects will work with the Trust to develop a Construction Traffic Management Plan. The plan will include information on construction phases and duration, scheduling, proposed haul routes, permit parking, staging area management, visitor safety, detour routes, and pedestrian movements on adjacent routes.

PTMP mitigation measures related to parking supply and the use of the 14<sup>th</sup>/15<sup>th</sup> Avenue Gates (TR-23 and TR-11 portion) have been addressed in the definition of the project alternatives and are thus not repeated here. Other intersection improvement measures included in the PTMP EIS fall outside the

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<sup>15</sup> In a comment letter on the PTMP EIS, the San Francisco Department of Parking and Traffic (DPT) expressed concern about the reasonableness of signalization at this intersection. Since the average delay per vehicle on the minor approaches to the intersection of California Street/14<sup>th</sup> Avenue is expected to be less than for the minor approaches to the intersection of Lake Street/14<sup>th</sup> Avenue, the alternatives to signalization developed for the intersection of Lake Street/14<sup>th</sup> Avenue (right-turn-only restrictions) would also likely improve the operation of the minor approaches of the intersection of California Street/14<sup>th</sup> Avenue. The Trust will continue to work with the San Francisco DPT to develop an acceptable mitigation measure for this intersection. Ultimately, because this intersection is within the City and County of San Francisco's jurisdiction, implementation of the measure will be at the discretion of the City and County of San Francisco.

PHSH district and vicinity, and also are not repeated here. Mitigation Measure TR-9 *Bicycle and Pedestrian Amenities* will be implemented as planned improvements are funded pursuant to the adopted Presidio Trails and Bikeways Master Plan. Mitigation Measure TR-21 *Presidio-wide Parking Management*, which applies to the Crissy Field area, does not apply to the PHSB district, where the Trust's private development partner(s) will be required to manage parking to address dual goals: to avoid spillover impacts on adjacent neighborhoods and natural or recreation areas, and to discourage excessive auto ownership and auto use by project residents.

The following additional mitigation measures have been identified in the analysis of the PHSB project:

TR-27 *California Street / 15<sup>th</sup> Avenue Intersection Improvements* – This two-way stop-controlled intersection is expected to operate at LOS E or F in the PM peak hour with all alternatives, including the Requested No Action Alternative. Alternatives 1, 2, 3, and 4 are expected to contribute between two and eight percent to the PM peak hour volumes at this intersection in 2020, depending on the alternative. Prior to the operation of both minor approaches deteriorating to LOS E or F, the northbound and/or southbound approach (depending on the alternative) could be restricted to right turns only with signage and striping.

TR-28 *Lake Street / 15<sup>th</sup> Avenue Intersection Improvements (Requested No Action Alternative Only.)* – This all-way stop-controlled intersection is expected to operate at LOS E in both the AM and PM peak hours with the Requested No Action Alternative. Implementation of the one-way couplet assumed in PTMP and under Alternatives 1, 2, 3, and 4 will improve the operation of this intersection to LOS D or better.

TR-29 *Lake Street / Funston Avenue Intersection Improvements* – This two-way stop-controlled intersection is expected to operate at LOS E in the PM peak hour with all alternatives, including the Requested No Action Alternative assuming the one-way couplet at the 14<sup>th</sup> Avenue and 15<sup>th</sup> Avenue Gates. Alternatives 1, 2, 3, and 4 are expected to contribute between one and six percent to the PM peak hour volumes at this intersection in 2020, depending on the alternative. Prior to the operation of both minor approaches deteriorating to LOS E or F, the City could restrict the northbound and/or southbound approach (depending on the alternative) to right turns only with signage and striping.

TR-30 *Lake Street / Park Presidio Boulevard Intersection Improvements (Alternative 1 Only)* – The signalized intersection of Lake Street/Park Presidio Boulevard is expected to operate at LOS E in the PM peak hour when the traffic volumes associated with Alternative 1 are combined with the travel patterns created by the Park Presidio Boulevard Access Variant. This impact is attributed to the high southbound through volumes and southbound right-turn volumes. The most effective mitigation would be to add a southbound right-turn lane and maintain the three southbound through lanes. The adjacent land is outside of state and federal right-of-way, and lies within the jurisdiction of the San Francisco Recreation and Park Department.

## 3.3 Historic Resources

### 3.3.1 AFFECTED ENVIRONMENT

The history and the significant buildings, structures, and landscapes of the Presidio are described on pages 68 to 76 of the PTMP EIS. This description, and the 1993 National Historic Landmark District (NHLD) nomination, are incorporated here by reference, and portions relating to the PSHH district are summarized below. Further information can be found in the draft Planning and Design Guidelines included in Appendix A of the PSHH EA.

#### 3.3.1.1 Presidio NHLD

The entirety of the Presidio, including the PSHH district, is designated as a NHLD. In 1993, the NPS completed an update of the original 1962 landmark nomination, establishing these boundaries and defining 662 buildings, sites, structures, and objects as contributing to the significance of the NHLD.

For purposes of the NHLD, the Presidio's period of significance was identified as from 1776 to 1945, with themes related to the military, exploration and settlement, Hispanic heritage, and historic archaeology. Building 135 (the Golden Gate Club), dating from 1949, was the only structure from outside the period of significance that was found to contribute to the NHLD, because this building was the site of the signing of the U.S. Japan Security Treaty in 1951.

Since the U.S. Army's departure and formation of the Trust, jurisdiction over the Presidio has been split between the NPS and the Trust, and approximately 40 historic buildings have been demolished,<sup>16</sup> leaving about 430 contributing elements within the Trust's jurisdiction and 622 within the Presidio as a whole.

#### 3.3.1.2 History of the PSHH District

The Marine Hospital Service, a division of the U.S. Treasury, established a hospital at the project site in the 1870s. The original complex consisted of two-story wood frame buildings on the west shore of Mountain Lake, and continued to grow as needs of the hospital expanded. In 1912, the Service was reorganized and renamed the U.S. Public Health Service to reflect its role as the federal guardian of public health. In 1928, plans were completed for a new hospital building. The new building (Building 1801 or the PSHH) opened in 1932 to the west of the original hospital building, which was then removed from service and demolished. Later changes included the construction of Park Presidio Boulevard as an approach to the Golden Gate Bridge, an expansion of Building 1801 in the 1950s, and development of a Nike Missile facility at Battery Caulfield north of the PSHH also in the 1950s.

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<sup>16</sup> Thirty-seven buildings were demolished by the NPS, fire destroyed Building 1055, and Buildings 633 and 1387 have suffered damage or structural failures resulting in their demolition (or pending demolition) by the Trust.

### **3.3.1.3 Contributing Buildings and Structures within the PHS District**

Contributing buildings and predicted historic archaeological sites within the PHS district are shown in Figure 12. The buildings include four from the early decades of the 20<sup>th</sup> century before the 1870s-era hospital was replaced. Building 1810 and Building 1809, single-family residences on Wyman Avenue, date from 1915 and 1920, respectively. Residential quarters 1806 and 1807 date from between 1920 and 1928, and originally comprised living quarters associated with the 19<sup>th</sup> century hospital complex. Building 1807 is currently being evaluated to determine its architectural integrity due to evidence of substantial deterioration above the level of the first floor.

Eleven buildings on the lower plateau (Buildings 1801, 1802, 1805, 1808, and 1811 through 1815) and the immediately adjacent area (Buildings 1818 and 1819) date from 1930 to 1932, when the project site was almost entirely redeveloped. The largest building is Building 1801, which was altered in the 1950s to add two projecting wings in front, with a connecting one-story loggia and lobby. The 1950s additions obscure most of the 1932 building façade, and are not considered eligible for the National Register (Trust 2004a).

Other contributing buildings in the PHS district include Buildings 1449, 1450, and 1451, which were Army structures unassociated with the nearby hospital complex. The largest building (Building 1450) was constructed as a radio transmitting station to serve the coastal defense batteries and was later used to support the adjacent missile facility.

The Nike Missile facility itself was constructed in 1953, after an agreement between the U.S. Air Force and the U.S. Army that determined that the Army would be responsible for short-range missiles such as the Nike Ajax and Nike Hercules. The Nike Missile facility at Battery Caulfield is not considered eligible for the National Register (Trust 2004a).

### **3.3.1.4 Cultural Landscape Features within the PHS District**

Designed landscapes of the PHS district have been altered substantially over time; however, the site's spatial orientation and topography remain largely unchanged from the NHL period of significance, as do a number of smaller landscaped open spaces, elements of the circulation system, and some site vegetation. The PHS dominates the lower plateau and views from the south, with a backdrop of Monterey pines on the slope behind the building.

The formal entry drive and lawn from the 1932 construction period are gone, but open space still defines the front of Building 1801 and a lawn still slopes down from the front of the houses on Wyman Avenue. A "Central Green" lies between the houses and Buildings 1806 and 1807, although the structure that once formed its northern edge no longer exists. Remains of a terraced garden include the foundations of a pair of small green houses and step up the slope behind the Central Green. Tree stands also remain near the 15<sup>th</sup> Avenue Gate, behind Building 1801, and along the Presidio Golf Course boundary.

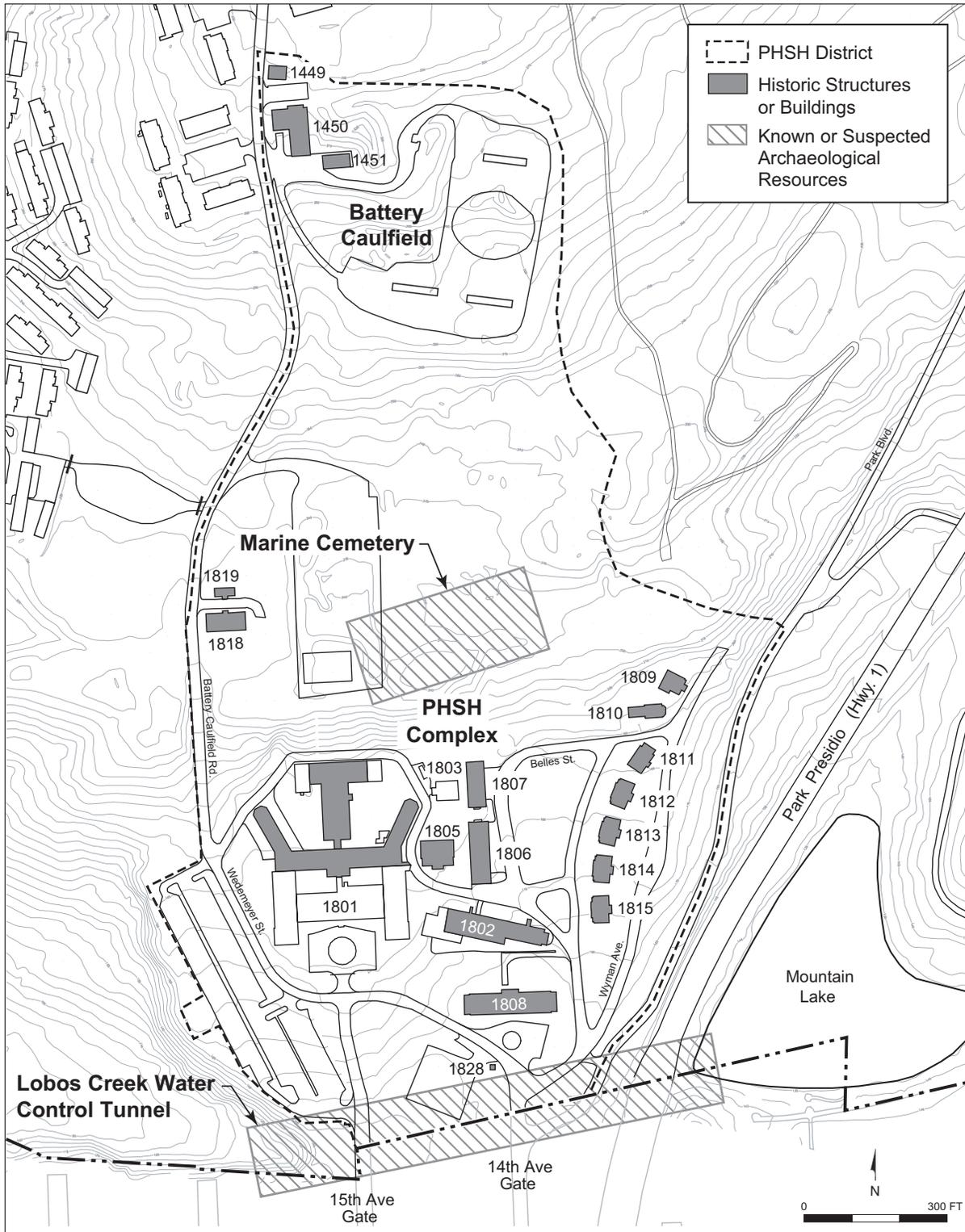


FIGURE 12. HISTORIC BUILDINGS AND ARCHAEOLOGICAL RESOURCES

Source: Presidio Trust, 2004

The PSHH site includes remnants of foundation plantings as well as trees that date from the period of significance. In addition, Wyman Avenue, Belles Street, and Park Boulevard remain essentially unchanged from their pre-1932 alignments, and Park Presidio Boulevard still connects the neighborhoods south of the Presidio to the Golden Gate Bridge. Park Presidio Boulevard was included as a contributing resource in the 1993 update to the Presidio NHLD prepared by the NPS, although an evaluation prepared by Caltrans in 1987 and reviewed in 1994 concluded that it was ineligible. For purposes of this analysis, the Trust has treated the resource as eligible for the National Register as a contributing element in the Presidio NHLD.<sup>17</sup>

### **3.3.1.5 Regulatory Environment**

As described in the PTMP EIS (page 82), the Trust is required to comply with the National Historic Preservation Act (NHPA). Section 110 of the NHPA sets out the broad responsibilities of federal agencies to integrate preservation into their ongoing activities, and requires agencies to “minimize harm” to National Historic Landmarks like the Presidio. Section 106 of the NHPA requires federal agencies to take into account the effects of their actions on historic properties, and to seek comments on their actions from an independent reviewing agency, the Advisory Council on Historic Preservation (ACHP).

During preparation of the PTMP, the Trust consulted with the ACHP, the California State Historic Preservation Officer (SHPO), and the NPS, and executed a Programmatic Agreement (PA) regarding the plan and various operation and maintenance activities within Area B of the Presidio. This PA establishes procedures by which the Trust will satisfy its Section 106 and Section 110 responsibilities (see PTMP EIS Appendix D for the full text of the agreement).

Pursuant to Stipulation X of the PA, the Trust submitted to the ACHP, SHPO, NPS, and concurring parties a consultation package regarding the PSHH project in February 2004. That consultation package included the EA, public comments received during the scoping of the EA, and the draft Planning and Design Guidelines (included in the EA as Appendix A). At the request of concurring parties, consultation regarding this package of materials – originally scheduled for June 2004 – was deferred to allow preparation of the Draft SEIS and a cultural landscape assessment of the PSHH district.

These supplemental materials, together with public comments and correspondence regarding historic resources received during circulation of the EA, will be provided to the ACHP, SHPO, NPS, and concurring parties concurrent with publication of this Draft SEIS. Consultation under the NHPA will proceed as indicated in Stipulation X, and must be completed prior to project approval. Review of any new construction proposed as part of the project will occur as set forth in Stipulation XI, and review of historic rehabilitation proposed by the Trust’s private development partner(s) as part of the project will occur during the Trust’s design review and/or during the Part I and Part II Certification Process (36 CFR Part 67) established for rehabilitation tax credit projects.

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<sup>17</sup> See Caltrans memo dated 12.10.87, File No. 4-SF 5.9/7.1 4220-124620 cited in a March 1994 Historic Property Survey Report and Finding of Adverse Effect for the Proposed Seismic Retrofit Project on the Presidio Viaduct in the City and County of San Francisco. Section VI(B) of the Trust’s Programmatic Agreement (see Section 3.1.1.5) suggests that where there is some question as to eligibility, the Trust may treat that property as National Register eligible for the purpose of evaluating effects.

### 3.3.2 ENVIRONMENTAL CONSEQUENCES

The potential impacts of development within the Presidio on historic resources and the cultural landscape, including the NHLD as a whole, are assessed on pages 196 to 215 of the PTMP EIS. This analysis, which addresses a variety of alternatives for the PHSB district, is incorporated here by reference and summarized below. A site-specific analysis of potential impacts associated with the current range of alternatives for the project site follows.

The PTMP analysis presents a discussion of proposed changes within the PHSB district, including one scenario that would demolish all of the buildings on the site, one that would remove non-historic buildings only, one that would rehabilitate and reuse the buildings as they currently stand, and one that would build out the adopted Plan's maximum allowable new construction (130,000 sf) and demolition (130,000 sf).

The analysis concludes that demolition of historic buildings within the PHSB district would have an adverse effect on the NHLD, but that rehabilitation and reuse of the buildings as they currently exist or rehabilitation and reuse following demolition of non-historic additions would have a beneficial effect on historic resources. The analysis also indicates that if non-historic square footage is removed and replaced with buildings elsewhere within the PHSB district, new (replacement) space would be sited and designed to reinforce historic character-defining features of the PHSB district in conformance with the PTMP planning principles and planning district guidelines. These principles and guidelines require that new construction be compatible with the historic setting of the Presidio, and that character-defining features of the PHSB district be maintained. As a result, the PTMP EIS concludes that new construction would not impair the integrity of the NHLD.

#### 3.3.2.1 Requested No Action Alternative

The Requested No Action Alternative would reuse previously rehabilitated and currently occupied historic buildings in the PHSB district (i.e., Buildings 1450, a portion of 1802, 1803, 1805, 1806, and 1808), but would "mothball" currently vacant historic buildings, including the main hospital building (Building 1801) and the Wyman Avenue houses. Mothballing would protect the vacant buildings from weather, and would secure them from vandalism to the extent feasible. Such stabilization would minimally respond to the Trust's mandate under Section 110 of the NHPA, and leave the decision whether to rehabilitate and reuse the buildings or demolish them to a subsequent planning process.

By reusing previously rehabilitated buildings and stabilizing vacant ones to prevent further deterioration, the Requested No Action Alternative would not adversely affect historic resources. No historic fabric would be removed and no buildings would be demolished. However, no historic fabric would be rehabilitated, and the potential for removal of historic buildings at some point in the future would remain. This approach would be inconsistent with the spirit of PTMP planning principles that call for the rehabilitation and reuse of historic buildings, and not for their mothballing until some future date. No beneficial impacts on historic resources would occur. (See Table 17 for a comparison of the alternatives.)

Table 17. Summary of Adverse and Beneficial Impacts on Historic Resources

	REQUESTED NO ACTION ALTERNATIVE	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4
<b>Adverse Impacts</b>					
Demolition of Historic Buildings	no	no	no	no	no
Inappropriate Additions/Changes	no	no	no	no	no
<b>Beneficial Impacts</b>					
Rehabilitation of Historic Buildings	no	yes	yes	yes	yes
Removal of Non-Historic Fabric	no	no	yes <sup>a</sup>	yes <sup>a</sup>	yes <sup>a</sup>
Appropriate Landscape Changes	no	yes	yes	yes	yes
Historical Interpretation	no	yes	yes	yes	yes

Source: Presidio Trust 2004.

Notes:

<sup>a</sup>Alternative 2 would remove 22,000 to 48,000 sf from the front of Building 1801 (depending on whether the wings are reduced in height); Alternatives 3 and 4 would remove about 115,000 sf.

### 3.3.2.2 Alternative 1: PTMP Alternative

Building rehabilitation and reuse under this alternative would have a beneficial effect on historic architectural resources. Historic portions of Building 1801 and other buildings in the PSHH district would be rehabilitated in accordance with the Secretary of the Interior’s Standards and returned to active use. Physical changes within the PSHH district would also comply with the planning principles and the planning district guidelines in the PTMP and with the Guidelines for Rehabilitating Buildings at the Presidio of San Francisco (ARG 1995). Where historic fabric is proposed for removal, either due to its poor condition or to accommodate the adaptive reuse of the buildings, it would be documented according to Historic American Building Survey standards.

Non-historic elements within the PSHH district, including the non-historic wings on the front of Building 1801 and the connecting loggia, would also be rehabilitated and maintained in this alternative. The wings would retain their current configuration and appearance, although any blue panels or other façade materials that are missing or damaged would be replaced in kind.

Rehabilitating and retaining existing non-historic additions to the PSHH district would not affect historic resources, since there would be no appreciable change in the appearance of the historic resources when

compared to existing conditions or to the conditions that existed when the National Register eligibility of the PHS district was established. Retaining non-historic elements would not, however, return the historic hospital building to its original prominence or expose its principal façade. Alternative 1 would not involve new construction, and thus would have no impacts associated with the introduction of new buildings within the PHS district.

In combination with remediation of Landfills 8 and 10, and with planned trail and access improvements, Alternative 1 would involve landscape changes within the PHS district. These changes would include re-creation of a formal entry drive from the 14<sup>th</sup> Avenue Gate to Building 1801, reconfiguration of parking areas on the lower plateau, and additions to remnant planted borders and designed landscape areas throughout the lower plateau. All changes would be required to conform to the Secretary of the Interior's Guidelines for the Treatment of Cultural Landscapes (NPS 1992b).

In conformance with the PTMP, Alternative 1 would include installation of interpretive materials in some building lobbies and at key wayside locations throughout the PHS district. Specifically, signs and/or landscape treatments would commemorate the site of the former Marine Hospital Cemetery, and would explain the history of the Nike Missile Site and the significance of the Public Health Service and individual buildings within the district. Pursuant to the Presidio Trust Act, the NPS would be asked to assist the Trust in developing interpretive materials. The Fort Point and Presidio Historical Association and the California Heritage Council (CHC) have also agreed to assist the Trust.

### **3.3.2.3 Alternative 2: Infill Alternative**

Building rehabilitation and reuse in Alternative 2 would have a beneficial effect on historic architectural resources, similar to Alternative 1, because historic portions of Building 1801 and other buildings in the PHS district would be rehabilitated in accordance with the Secretary of the Interior's Standards and returned to active use. In addition, Alternative 2 would have a beneficial effect on historic resources due to removal of the non-historic lobby and loggia of Building 1801, and possibly a portion of the non-historic wings.

Physical changes within the PHS district would comply with the site-specific Planning and Design Guidelines prepared for the PHS district and included in draft form in Appendix A of the PHS EA. These guidelines, which are intended to provide specific direction to project designers and ensure compliance with the planning principles and the planning district guidelines in the PTMP, will be finalized following public review and consultation with the SHPO, ACHP, and other signatories to the PA. Where historic fabric is proposed for removal, either due to its poor condition or to accommodate the adaptive reuse of the buildings, it would be documented according to Historic American Building Survey standards.

Most non-historic elements within the PHS district, including the non-historic wings on the front of Building 1801, would be rehabilitated and retained in this alternative, similar to Alternative 1. However, the one-story loggia and lobby connecting the wings would be removed to reveal the central portion of the historic facade, and the wings themselves would receive a new façade treatment. In addition, non-historic

additions at the rear of Building 1801 may be removed and the front wings may be lowered in height, either by removing a rooftop wind screen or by removing the wind screen and up to two stories of the wings. These changes would improve the wings' compatibility with the historic building behind them, and would therefore have a beneficial effect on historic architectural resources. New cladding on the non-historic wings would be designed to improve their appearance, but not to mimic the historic façade or suggest an historic period.

New construction would occur at up to three locations within the PSHH district under this alternative. A new three-story building (between 14,000 and 17,000 sf) would be constructed at the north end of the Central Green, a new two-story duplex would be constructed at the south end of Wyman Avenue, and building space could be added to the central wing at the rear of Building 1801. In conformance with the draft Planning and Design Guidelines as well as the PTMP planning district guidelines and the Secretary of the Interior's Standards, all new construction would be compatible with surrounding historic buildings in scale, massing, and design, but would be clearly distinguishable as contemporary, rather than mimicking an earlier style or period. The new buildings sited north of the Central Green and at the south end of Wyman Avenue would be located where buildings existed on the site previously, and would reinforce the campus-like setting by fitting onto compact sites, close to existing buildings as called for in the PTMP planning district guidelines.

In combination with remediation of Landfills 8 and 10, and with planned trail and access improvements, Alternative 2 would involve landscape changes within the PSHH district. These changes would include re-creation of a formal entry drive from the 14<sup>th</sup> Avenue Gate to Building 1801, reconfiguration of parking areas on the lower plateau and elimination of the parking area at Landfill 8, and additions to remnant planted borders and designed landscape areas throughout the lower plateau. Underground parking proposed for the area in front of and beneath the PSHH would increase the amount of landscaping in the area, raise the forecourt to the height of the building's first floor, and also introduce access and egress points on the south and west sides of the building. Introduction of a new building on Belles Street would require adjusting the width and/or location of the street. Because the street and the small "green" it helps to define would still remain, this change would not substantially affect the landscape character.

All site changes would be required to conform with the Secretary of the Interior's Guidelines for the Treatment of Cultural Landscapes (NPS 1992b), and would be preceded by preparation of a detailed cultural landscape assessment for areas within and adjacent to the leasehold boundary proposed by the Trust's private development partner(s).

In conformance with the PTMP, Alternative 2 would include installation of interpretive materials in some building lobbies and at key wayside locations throughout the PSHH district. Specifically, signs and/or landscape treatments would commemorate the site of the former Marine Hospital Cemetery, and would explain the history of the Nike Missile Site and the significance of the Public Health Service and individual buildings within the complex. Pursuant to the Presidio Trust Act, the NPS would be asked to assist the Trust in developing interpretive materials. The Fort Point and Presidio Historical Association and the CHC have also agreed to assist the Trust.

#### **3.3.2.4 Alternative 3: No Infill Alternative**

Building rehabilitation and reuse in Alternative 3 would have a beneficial effect on historic architectural resources, similar to Alternative 1 and Alternative 2, because historic portions of Building 1801 and other buildings in the PHSH district would be rehabilitated in accordance with the Secretary of the Interior's Standards and returned to active use. In addition, Alternative 3 would have a beneficial effect on historic resources by removing the non-historic lobby and loggia of Building 1801 *plus* the entirety of the building's non-historic wings.

Physical changes within the PHSH district would comply with the site-specific Planning and Design Guidelines prepared for the PHSH district and included in draft form in Appendix A of the PHSH EA. These guidelines, which are intended to provide specific direction to project designers and ensure compliance with the planning principles and the planning district guidelines in the PTMP, will be finalized following public review and consultation with the SHPO, ACHP, and other signators to the PA. Where historic fabric is proposed for removal, whether due to its poor condition or to accommodate the buildings' adaptive reuse, it would be documented according to Historic American Building Survey standards.

Removal of non-historic elements within the PHSH district, including the non-historic wings on the front of Building 1801, would reveal the historic façade of the main hospital. Non-historic portions of Building 1802 would also be removed, along with the entirety of Building 1803. All of these changes would have a beneficial effect on historic architectural resources. Alternative 3 would also not involve new construction, and thus would have no impacts associated with the introduction of new buildings within the PHSH district.

In combination with remediation of Landfills 8 and 10, and with planned trail and access improvements, Alternative 3 would involve landscape changes within the PHSH district. These changes would include re-creation of a formal entry drive from the 14<sup>th</sup> Avenue Gate to Building 1801, reconfiguration of parking areas on the lower plateau and elimination of the parking area at Landfill 8, and additions to remnant planted borders and designed landscape areas throughout the lower plateau. All changes would be required to conform to the Secretary of the Interior's Guidelines for the Treatment of Cultural Landscapes (NPS 1992b) and would be preceded by preparation of a detailed cultural landscape assessment for areas within and adjacent to the leasehold boundary proposed by the Trust's private development partner(s).

In conformance with the PTMP, Alternative 3 would include installation of interpretive materials in some building lobbies and at key wayside locations throughout the PHSH district. Specifically, signs and/or landscape treatments would commemorate the site of the former Marine Hospital Cemetery, and would explain the history of the Nike Missile Site and the significance of the Public Health Service and individual buildings within the complex. Pursuant to the Presidio Trust Act, the NPS would be asked to assist the Trust in developing interpretive materials. The Fort Point and Presidio Historical Association and the CHC have also agreed to assist the Trust.

### **3.3.2.5 Alternative 4: Battery Caulfield Alternative**

Building rehabilitation and reuse in Alternative 4 would have a beneficial effect on historic architectural resources, similar to Alternatives 1, 2, and 3, because historic portions of Building 1801 and other buildings in the PSHH district would be rehabilitated in accordance with the Secretary of the Interior's Standards and returned to active use. In addition, like Alternative 3, Alternative 4 would have a beneficial effect on historic resources due to removal of the non-historic lobby, loggia, and wings of Building 1801.

Physical changes within the PSHH district would comply with the site-specific Planning and Design Guidelines prepared for the PSHH district. These guidelines, which are intended to provide specific direction to project designers and ensure compliance with the planning principles and the planning district guidelines in the PTMP, will be finalized following public review and consultation with the SHPO, ACHP, and other signatories to the PA. Where historic fabric is proposed for removal, whether due to its poor condition or to accommodate adaptive reuse of the buildings, it would be documented according to Historic American Building Survey standards.

Removal of the non-historic wings on the front of Building 1801 in this alternative would reveal the historic façade of the main hospital building, similar to Alternative 3. Additional, non-historic additions may also be removed, along with non-historic Building 1803. These changes would have a beneficial effect on historic architectural resources.

New construction would occur at two locations within the PSHH district under this alternative. A new three-story building (between 14,000 and 17,000 sf) would be constructed at the north end of the Central Green, and up to 64 apartments (about 56,000 sf) would be constructed at Battery Caulfield on the upper plateau. In conformance with the guidelines included in Appendix A of the PSHH EA, as well as the PTMP planning district guidelines and the Secretary of the Interior's Standards, all new construction would be compatible with surrounding historic buildings in scale, massing, and design, but would be clearly distinguishable as contemporary, rather than mimicking an earlier style or period. The new building sited north of the Central Green would be located where buildings existed on the site previously and would reinforce the campus-like setting by fitting onto a compact site, close to existing buildings as called for in the PTMP planning district guidelines. The new construction at Battery Caulfield would introduce buildings where none has existed in the past, although they would be scaled to ensure that the lower plateau and the PSHH maintain their prominence as the PSHH district's principal area of density and development.

In combination with remediation of Landfills 8 and 10, and with planned trail and access improvements, Alternative 4 would involve landscape changes within the PSHH district. These changes would include re-creation of a formal entry drive from the 14<sup>th</sup> Avenue Gate to Building 1801, reconfiguration of parking areas on the lower plateau and elimination of the parking area at Landfill 8, and additions to remnant planted borders and designed landscape areas throughout the lower plateau. Introduction of a new building on Belles Street would require adjusting the width and/or location of the street. Because the

street and the small “green” it helps to define would still remain, this change would not be considered significant.

All changes would be required to conform to the Secretary of the Interior’s Guidelines for the Treatment of Cultural Landscapes (NPS 1992b), and would be preceded by preparation of a detailed cultural landscape assessment for areas within and adjacent to the leasehold boundary proposed by the Trust’s private development partner(s).

In conformance with the PTMP, Alternative 4 would include installation of interpretive materials in some building lobbies and at key wayside locations throughout the PHSB district. Specifically, signs and/or landscape treatments would commemorate the site of the former Marine Hospital Cemetery, and would explain the history of the Nike Missile Site and the significance of the Public Health Service and individual buildings within the complex. Pursuant to the Presidio Trust Act, the NPS would be asked to assist the Trust in developing interpretive materials. The Fort Point and Presidio Historical Association and the CHC have also agreed to assist the Trust.

### **3.3.2.6 Park Presidio Boulevard Access Variant**

The Park Presidio Boulevard Access Variant would add an intersection to Park Presidio Boulevard approximately 400 feet north of Lake Street, at just about the point that an existing retaining wall ends. Resulting changes to Park Presidio Boulevard would not affect the highway’s alignment, although drivers would notice minor visual changes such as new signs, a street light, and grading changes to accommodate the access road on the west side of the highway, across from Mountain Lake. The resulting roadway configuration would resemble the configuration of Park Presidio Boulevard in this area before the Golden Gate Bridge was opened to traffic. As shown in Figure 13, Park Presidio Boulevard was originally a landscaped boulevard that extended into the PHSB district at about the location now proposed for introduction of a signalized intersection. This condition was modified shortly after the photograph in Figure 13 was taken, and Park Presidio Boulevard’s primary function changed. It was no longer simply a connection between Golden Gate Park and the forested lands of the Presidio, but connected the city to Highway 1 and the Golden Gate Bridge.

Providing direct access between the PHSB district and Park Presidio Boulevard in combination with Alternatives 1, 2, 3, or 4 would require some changes to the PHSB district’s internal roads and landscaping, but not to the extent that significant impacts on the cultural landscape would occur. Specifically, the new access point would require that Wyman Avenue and Hays Street join and turn west earlier than they do currently, intersecting with a modified intersection or at the front of Building 1808. A formal entry drive from the 14<sup>th</sup> Avenue Gate would also intersect this intersection, since this gate would be open for inbound access to the site (as would the 15<sup>th</sup> Avenue Gate). All internal streets would be retained, and the landscaped open areas in front of the Wyman Avenue homes would be preserved. Park Boulevard would continue to exist as a trail and service road immediately west of Park Presidio Boulevard, but its alignment would also be modified somewhat at its southern terminus.

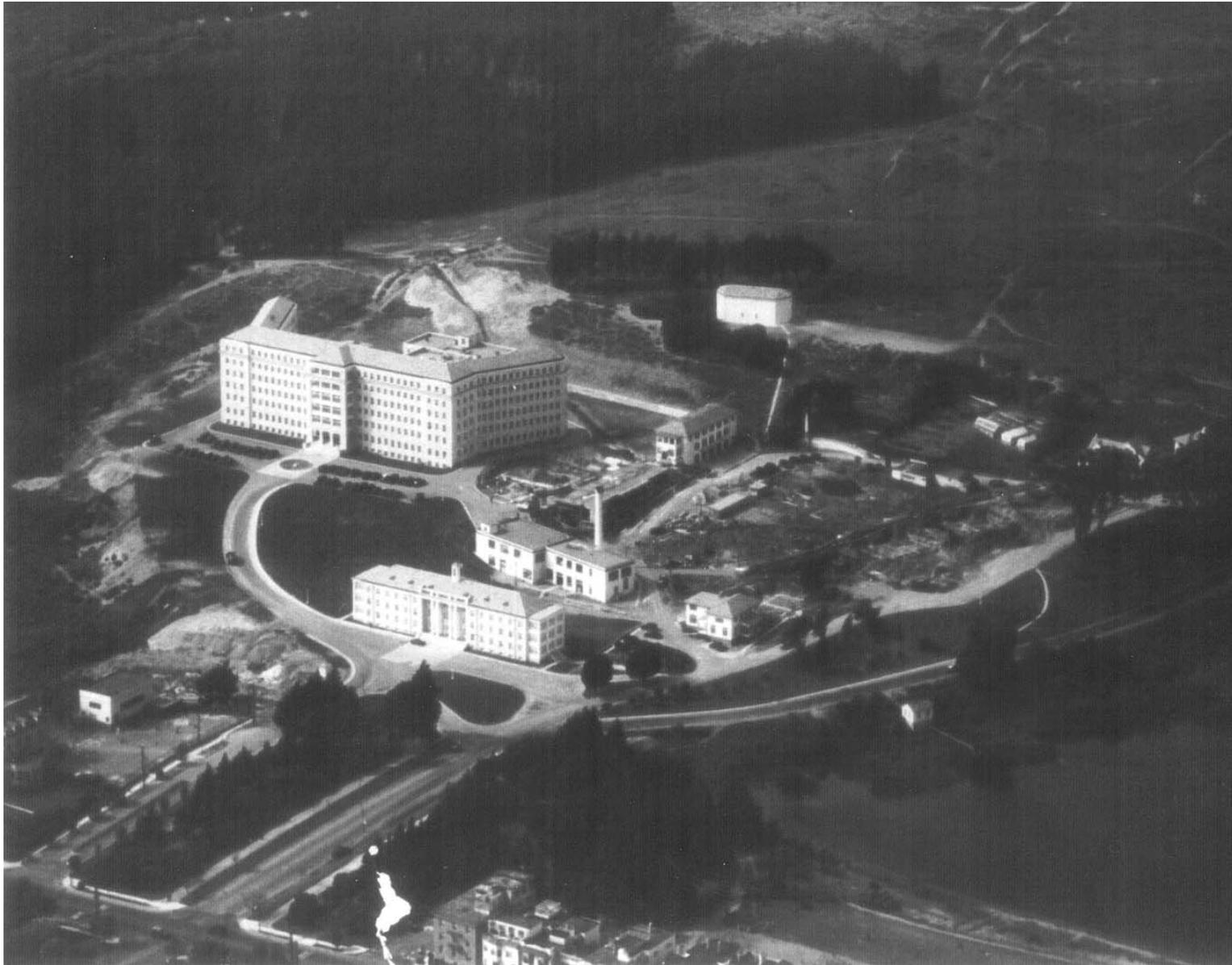


FIGURE 13. PARK PRESIDIO BOULEVARD ACCESS, CIRCA 1932

Source: National Park Service, Golden Gate National Recreation Area, Park Archives and Record Center

Consistent with the alternatives analyzed above, all changes would be required to conform with the Secretary of the Interior's Guidelines for the Treatment of Cultural Landscapes (NPS 1992b) and would be preceded by preparation of a detailed cultural landscape assessment for areas within and adjacent to the leasehold boundary proposed by the Trust's development partner(s).

### **3.3.2.7 Cumulative Effects**

All alternatives except the Requested No Action Alternative would have a beneficial effect on historic architectural resources because they would involve rehabilitation and reuse of historic structures within the PSHH district. When the rehabilitation of historic buildings at the PSHH district is considered in combination with the ongoing rehabilitation of other historic buildings at the Presidio, the cumulative effect would also be beneficial. Since the Presidio became a national park site, approximately 170 historic residential buildings, along with approximately 750,000 sf of non-residential space, have been rehabilitated. The PSHH project would add seven historic residential buildings (duplexes and single-family houses) and about 250,000 sf of nurses' dormitories and non-residential space to this total.

Landscape and circulation changes associated with each alternative would be carefully designed and constructed to avoid adverse effects on character-defining features of the cultural landscape. The same is true for changes associated with other planned projects in the area, such as the remediation of landfill sites, the creation of trails, establishment of a trailhead and scenic overlook as called for in the Presidio Trails and Bikeways Master Plan, and the ecological enhancement of natural areas. Thus, with the mitigation measures agreed to as part of the PTMP, cumulative impacts on the cultural landscape of the PSHH district and the NHLD would be avoided.

### **3.3.3 MITIGATION MEASURES**

All potentially significant impacts on historic resources would be avoided under all alternatives with implementation of the following mitigation measures derived from the PTMP EIS. These mitigation measures have been adopted as conditions of approval.

*CR-1 Documentation of Building Addition to be Removed* – Should all or some of the non-historic additions to Building 1801 or Building 1802 be removed, appropriate mitigating measures will be determined in consultation with the SHPO and the ACHP during the Section 106 consultation process. In this instance, measures will protect historic fabric from inadvertent damage due to removal of non-historic additions. Any historic fabric proposed for removal during rehabilitation of historic buildings will be recorded using Historic American Building Survey Standards.

*CR-2 Code Compliance* – As stipulated in the Presidio Trust Act, the Trust will upgrade buildings to meet life safety standards and to comply with the Americans with Disabilities Act (ADA) as necessary. Rehabilitation of historic buildings will include modifications to meet applicable building codes to the extent practicable.

CR-3 *Long-Term Maintenance and Preservation of Vacant Buildings* – Following rehabilitation of historic buildings, the Trust will ensure that development partners or designees perform continued maintenance, thereby preventing damage to historic features and ensuring that buildings are adequately maintained. Buildings within the PHSH district that remain vacant will be “mothballed” or otherwise protected to prevent further deterioration, and will be inspected regularly. The Trust will set priorities and undertake necessary stabilization work to ensure long-term preservation and safe conditions for park visitors.

CR-6 *Monitoring of Visitor Impacts on Sensitive Resources* – The Trust will monitor sensitive cultural resources, such as historic landscape features and vacant structures, and identify actions to reduce any adverse impacts on these resources caused by park visitors and uses. Potential remedies (in addition to the remedy embodied in the Trust’s current project to rehabilitate and reuse vacant buildings in the PHSH district) may include temporary closure of areas, protective barriers, and informational signs.

CR-7 *Compliance with Standards for Building and Cultural Landscape Rehabilitation* – The Trust will ensure that building rehabilitation conforms to the Guidelines for Rehabilitating Buildings at the Presidio of San Francisco (ARG 1995) and the Secretary of the Interior’s Standards for the Rehabilitation of Historic Properties (NPS 1992a). Review for compliance with the Secretary of Interior’s Standards may occur within the Investment Tax Credit Part I and Part II Certification process as delineated in 36 CFR Part 67.

For historic landscape rehabilitation, the Trust will ensure conformance to the Secretary of the Interior’s Guidelines for the Treatment of Cultural Landscapes (NPS 1992b). To ensure compliance, the Trust will require its private development partner(s) to submit a detailed cultural landscape assessment for areas within and adjacent to their proposed leasehold boundary prior to approval of site improvements.

CR-8 *Ongoing Identification of Historic Properties* – Consistent with requirements under Section 110 of the NHPA and the signed PA, the Trust will continue to evaluate buildings or structures that may become 50 years old or may have achieved exceptional significance since the 1993 NHL Update form was completed to determine if they should be included in the list of contributing resources. These evaluations will also encompass archaeological discoveries.

PTMP EIS Mitigation Measure CR-5 *Historic Forest* would not apply within the PHSH district, since the PHSH district does not contain any forested areas identified as part of the Presidio’s historic forest. PTMP EIS Mitigation Measure CR-4 *Future Planning* will be satisfied by circulation of this Draft SEIS for public comment and concurrent consultation pursuant to the PA.

## 3.4 Archaeological Resources

### 3.4.1 AFFECTED ENVIRONMENT

Archaeological resources of the Presidio are described on pages 76 to 82 of the PTMP EIS. Relevant portions of that description are incorporated here by reference and expanded upon as necessary.

The history of the Marine Hospital is intertwined with that of the Presidio as a whole both in the development of military reservation lands and in the provision of services to the community. As a civilian facility, the Marine Hospital provided free medical care, both short-term and convalescent, to merchant marines. While no buildings from the original 1870s complex remain, the site had been continuously used as a marine hospital for more than 100 years, from its 1875 opening to its closing in 1981 by the U.S. Public Health Service.

Subsurface remains of the cemetery associated with the early history of this facility exist, and lie largely beneath an extensive paved court and parking area located on the rise near the southwest corner of the upper plateau. Historical research suggests that a substantial cemetery once existed behind the former Marine Hospital. While records could not be found to establish that the burials of the cemetery had been relocated, the Army assumed that a relocation had taken place. In 1990 the Army conducted a test excavation in an area presumed to have been the Marine Hospital Cemetery and found the remains of two burials below almost 15 feet of concrete rubble. In 2002, field investigations for environmental remediation of Landfill 8 by the Trust also encountered human remains near the ground surface (URS 2003). Historical research suggests that the remains of approximately 500 to 600 individuals are interred in the cemetery.

The known and predicted archaeological features within the site vicinity contribute to the NHL and are of national significance. These features are shown in Figure 12 and include the following:

- *PHAF-34 (Marine Hospital and Cemetery)* – This is an area of sensitivity that includes historic features associated with squatters or farmers (?-1869), the earlier construction of the Marine Hospital, outbuildings, historic refuse deposits (1875-1932), and the Marine Hospital Cemetery (1885- ).
- *PHAF-10 (Lobos Creek Water Control)* – Remains include the Hotelling Tunnel and parts of early water supply systems connecting Mountain Lake to the Spring Valley Water Works on Lobos Creek (1857-?).
- *PPAF-3 (Mountain Lake)* – This water source and the surrounding area have high potential for prehistoric archaeological sites (but no documented incidence of discovery), including the temporary encampment used in the spring of 1776 by a Spanish expedition led by Juan Bautista de Anza in the area adjacent to Mountain Lake prior to establishment of El Presidio de San Francisco in the Main Post area that summer.

### 3.4.2 ENVIRONMENTAL CONSEQUENCES

Potential impacts on archaeological resources are assessed on pages 215 to 219 of the PTMP EIS. This analysis is incorporated here by reference and expanded upon below. Reference is made to the Programmatic Agreement executed between the Trust, NPS, SHPO, and ACHP regarding routine maintenance projects and projects that implement the PTMP. A copy of the PA is included in Appendix D of the PTMP EIS and is available for review at the Trust's offices and website ([www.presidio.gov](http://www.presidio.gov)).

#### 3.4.2.1 Requested No Action Alternative

No building demolition or new construction is proposed under this alternative. Direct effects on archaeological resources would be limited to ground-disturbing activities resulting from routine maintenance and ongoing operation of buildings, grounds, roads and parking areas, utilities, and other existing facilities. Under the terms of Stipulation VII, Assessment of Effects, of the PA, these undertakings would be considered as repetitive and low impact in nature and would have minimal or low potential for affecting archaeological resources. Therefore, no known or previously identified archaeological property is likely to be affected.

#### 3.4.2.2 Alternative 1: PTMP Alternative

Under this alternative, no building demolition or replacement construction would occur. Direct effects on archaeological resources would be minimal and limited to such ground-disturbing activities as infrastructure upgrades, pavement removal, and landscaping pursuant to the PTMP undertaking. Under the terms of Stipulation XII, Archaeology, of the PA, an Archaeological Management Assessment and Monitoring Program would be prepared to determine whether subsurface coring or trenching and/or test excavations are required prior to ground disturbance, and ground-disturbing activities and construction would be closely observed (PTMP EIS Mitigation Measures CR-8 and CR-9). In accordance with the terms of Stipulation XIII, Discoveries, of the PA, if it appears that a previously unidentified property that could be eligible for inclusion in the National Register or could contribute to the NHLD could be affected, or a known historic property could be affected in an unanticipated manner, the Trust would stop any potentially harmful activities in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the property until it concludes consultation with the State Historic Preservation Officer (PTMP EIS Mitigation Measures CR-14 and CR-15). Other terms of Stipulations XII, Archaeology, and XIII, Discoveries, of the PA as reiterated in the PTMP EIS mitigation measures listed below would also be implemented to protect and manage the archaeological record.

#### 3.4.2.3 Alternative 2: Infill Alternative

Under this alternative, the potential for direct effects on archaeological resources would be slightly greater than the Requested No Action Alternative and Alternative 1 due to ground-disturbing activities associated with underground parking and the approximately 48,000 sf of demolition and infill construction at locations within the lower plateau. Similar to the Requested No Action Alternative and Alternative 1, however, the measures identified as stipulations of the PA and committed to as part of project implementation would avoid or minimize harm to archaeological resources.

#### **3.4.2.4 Alternative 3: No Infill Alternative**

Ground-disturbing activities associated with demolition of approximately 125,000 sf of non-historic buildings on the lower plateau would be likely to encounter archaeological resources. Similar to the Requested No Action Alternative and Alternatives 1 and 2, the measures identified as stipulations of the PA and committed to as part of project implementation would avoid or minimize harm to archaeological resources.

#### **3.4.2.5 Alternative 4: Battery Caulfield Alternative**

Direct effects on archaeological resources due to 56,000 sf of new construction within Battery Caulfield would be unlikely, since ground-disturbing activities would take place within a heavily modified area where there are no known or suspected resources. Demolition of 116,000 sf of building area on the lower plateau would likely encounter archaeological resources. Similar to the other alternatives, the measures identified as stipulations of the PA and committed to as part of project implementation would avoid or minimize harm to archaeological resources on the lower plateau.

#### **3.4.2.6 Park Presidio Boulevard Access Variant**

Grading and construction of the Park Presidio Boulevard Access Variant would occur in an area of the PHSB district that was disturbed when Highway 1 was originally constructed in the 1930s. As a result, the likelihood of encountering archaeological resources is minimal. Nonetheless, measures identified in the PA would avoid or minimize harm to archaeological resources if unexpected discoveries occur.

#### **3.4.2.7 Cumulative Effects**

Based on the cumulative analyses in the PTMP EIS, excavation or grading associated with development plans could disturb or destroy archaeological resources. Cumulative impacts on known prehistoric archaeological sites or historic archaeological resources are, in general, not expected to be adverse. Ground-disturbing activities and construction projects would be closely observed in the vicinity of sensitive archaeological areas, and archaeology stipulations in the PA would be followed. These stipulations include preparation of an Archaeological Management Assessment and Monitoring Program (AMA/MP) prior to ground disturbance. Because new construction would involve site investigations prior to excavation and/or monitoring for archaeological resources as needed during excavation, the likelihood that archaeological resources would be destroyed or damaged without appropriate attention to recordation and recovery would be minimized.

### **3.4.3 MITIGATION MEASURES**

The following measures are derived from the PA and PTMP EIS and were adopted as conditions of approval at the end of the PTMP planning and environmental review process. Implementation of these measures will serve to avoid potentially significant impacts in all alternatives:

*CR-8 Archaeological Management Assessment and Monitoring Program* – The Trust will require its private development partner(s) to retain the services of a qualified archaeologist who will develop an

Archaeological Management Assessment and Monitoring Program (AMA/MP) for areas and undertakings within and adjacent to their proposed leasehold boundary. The AMA/MP will ensure that all planned site disturbances are reviewed by a qualified archaeologist prior to final design and/or approval. In addition to the AMA/MP, the project archaeologist will prepare and the Trust will review an archaeological research design for any archaeological investigations that are required, and/or test excavations or data recovery from prehistoric or historic sites that are known or discovered. The Trust's management of archaeological properties is reviewed annually in accordance with Stipulation XXI of the PA. The AMA/MP and any research design required pursuant to this measure would be incorporated into the Trust's annual report.

CR-9 *Ground-Disturbing Activities* – Ground-disturbing maintenance activities and construction projects will be closely observed in the PHSH district's lower plateau to discover, document, protect, and manage the archaeological record of the Presidio. The AMA/MP described in PTMP EIS Mitigation Measure CR-8 will specify whether archival research, subsurface coring or trenching, and/or test excavations are required prior to ground disturbance, and if so, where. Archaeological monitoring is appropriate in areas of predicted archaeological sensitivity or for sampling purposes in areas that are not considered sensitive when the natural ground surface is obscured by paving or fill, or in other instances where a pedestrian survey or archaeological testing cannot reasonably be accomplished. Any required archaeological monitoring will be implemented in accordance with the AMA/MP and prepared by qualified personnel, and the project archaeologist will have the authority to stop excavation, grading or other construction activities in the vicinity of the discoveries to allow for investigation, evaluation, and (if appropriate) recovery. If historic properties or prehistoric properties are discovered during implementation of an undertaking, a detailed report will be prepared. Should circumstances arise where the Trust cannot address archaeological concerns in a manner consistent with the AMA/MP, the Trust will notify the SHPO. Following completion of all ground-disturbing activities, the project archaeologist will be required to prepare a written report of their findings for inclusion in the Trust's annual report.

CR-11 *Excavation Permits* – The Trust will require all excavation permits to undergo archaeological review by qualified personnel, as defined in Stipulation III of the PA, prior to initiation of the requested activity. The excavation clearance process is included as Appendix B to the PA.

CR-13 *Curation of Archaeological Collections* – All records associated with excavations and excavated materials not subject to the Native American Graves Protection and Repatriation Act (NAGPRA) that are deemed important for preservation will be accessioned, catalogued, and managed in accordance with 36 CFR Part 79, "Curation of Federally-Owned and Administered Collections."

CR-14 *Discoveries* – If it appears that an excavation in the PHSH district would affect a previously unidentified property that could be eligible for inclusion in the National Register, or could contribute to the NHL, or affect a known historic property in an unanticipated manner, the Trust will stop any potentially harmful activities in the vicinity of the discovery and take all reasonable measures to avoid or minimize harm to the property until it concludes consultation with the SHPO.

CR-15 *Treatment of Discoveries* – If the newly discovered property has not previously been included in or determined eligible for the National Register and provisions for its treatment are not contained in an approved research design or AMA/MP, the Trust may assume that the property is eligible for purposes of the PA. The Trust will notify the NPS and SHPO at the earliest possible time and consult to develop actions that shall take the effects of the undertaking into account. The Trust will notify the SHPO of any time constraints, and the Trust and the SHPO will mutually agree upon time frames for this consultation, which will not exceed 30 days. If treatment of the discovery is not included in an approved research design or AMA/MP, the Trust will develop written recommendations reflecting its consultation with the NPS and SHPO and, as necessary, will present a plan and schedule to implement these recommendations.

PTMP EIS Mitigation Measures CR-10 *Archaeological Grid and Database* and CR-12 *Archaeological Management Plan for El Presidio* would not apply to the PSHH project, except that any reports or excavated materials not subject to the NAGPRA would become the property of the Trust and would be incorporated into the Presidio's archaeological grid map and database.

## 3.5 Air Quality

### 3.5.1 AFFECTED ENVIRONMENT

The existing air quality environment of the Presidio and its regulatory context are described on pages 124 to 126 of the PTMP EIS. This description is incorporated here by reference. Information relevant to the PSHH district is summarized and updated below.

#### 3.5.1.1 Air Quality Management

The nine-county San Francisco Bay Area Air Basin has a history of recorded violations of federal and state ambient air quality standards for ozone, carbon monoxide (CO), and inhalable particulate matter less than ten microns in diameter (PM<sub>10</sub>). The U.S. Environmental Protection Agency (EPA) has classified the Bay Area a moderate non-attainment area for ozone, and as a maintenance (attainment) area for carbon monoxide. The California Air Resources Board (CARB) has given the Bay Area state-level non-attainment status for ozone and PM<sub>10</sub>. Implementation of relatively new standards for particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>) is also ongoing. Designations of attainment for this pollutant and strategies for control are not yet final, but it appears that the Bay Area will attain the U.S. EPA standards, while the CARB will designate the region with state-level non-attainment status. Measures that control PM<sub>10</sub> and gaseous pollutants from motor vehicles are also useful for controlling PM<sub>2.5</sub>.

The Bay Area Air Quality Management District (BAAQMD) is the primary agency responsible for managing compliance with the ambient air quality standards in the Bay Area. With the State Implementation Plan (SIP) and the Clean Air Plan (CAP), the BAAQMD identifies the steps that must be taken to attain and maintain the state and federal standards, respectively. Local jurisdictions can cooperate with these efforts by implementing transportation control measures to reduce emissions from

motor vehicles. The Trust's Transportation Demand Management (TDM) program would implement the relevant transportation control measures from the 2000 BAAQMD CAP (PTMP EIS, page 125).

In order to ensure that the proposed alternatives would not disrupt attainment of goals, federal actions must include a formal conformity determination if the action would cause total direct and indirect emissions of non-attainment pollutants to exceed specified thresholds. For any federal action in the Bay Area causing more than 100 tons per year of an ozone precursor (either reactive organic gases [ROG] or nitrogen oxides [NO<sub>x</sub>]) or CO, the general conformity rule would apply (40 CFR 51.853). Federal actions causing emissions below these thresholds are presumed to conform to the SIP.

The Trust manages the air quality effects of land use development by managing construction activities and the demand for transportation. Development at the Presidio must conform to the Presidio-wide TDM program that would reduce emissions from motor vehicle sources. The Trust also coordinates land uses to avoid collocation of sensitive receptors and substantial sources of pollution. Through these efforts, the Trust can ensure that its actions would be consistent with the SIP and the CAP and that it would not disrupt efforts to attain the ambient air quality standards.

### **3.5.1.2 Air Quality Conditions and Monitoring**

Air quality at the Presidio is generally superior to that of most urban areas because the park is generally upwind of most sources of pollution. Violations of the state and federal standard for ozone persist in the Bay Area inland from San Francisco. Pollutants from San Francisco tend to be carried into the more sheltered areas of the region and cause violations of the standards there. Because of the city's location and climate, neither federal nor state ozone standards have recently been exceeded in San Francisco. Only state standards for PM<sub>10</sub> have been recently exceeded locally. Concentrations of carbon monoxide in the Bay Area have complied with federal and state standards since 1991. Additional information about ambient air quality data is available in the PTMP EIS (pages 125 to 126).

Toxic air contaminants also affect the region. Because the effects of these contaminants are largely localized, ambient standards are not used to characterize their concentrations. Contaminants that are emitted primarily from motor vehicles account for over one-half of the average calculated cancer risk for Bay Area residents. Ambient benzene levels declined dramatically in 1996 with the advent of Phase 2 reformulated gasoline. Due largely to reductions in air toxics from motor vehicles, the calculated average cancer risk has been significantly reduced in recent years. Based on 2000 ambient monitoring data, the calculated cancer risk is 167 in one million, which is about 45 percent less than what was observed five years earlier (BAAQMD 2001).

### **3.5.1.3 Local Source Inventory**

Traffic-related emissions of criteria pollutants are generated along the roadways that surround and bisect the PHS district. Traffic congestion at the Presidio or on nearby roadways or intersections can occasionally result in localized elevated concentrations (hotspots) of carbon monoxide if heavy traffic coincides with stagnant weather conditions. Diesel trucks, buses, and other equipment are sources of particulates in diesel exhaust, which are considered to be a toxic air contaminant.

Existing stationary sources of air pollutants within the PHSB district are limited to a central boiler system and small printing and metal casting operation operated by a tenant, both within Building 1802. The boiler system is a natural gas-fired steam generator, rated at approximately seven million British thermal units per hour (MMBtu/hr). It currently operates to provide heating and steam for the occupied buildings adjacent to Building 1802. Emissions from the boiler are limited to those typically associated with natural gas combustion, including less than 25 pounds per day (lb/day) of NO<sub>x</sub> and a very small quantity (less than 0.05 lb/day) of formaldehyde and other combustion-related pollutants. Other units that may have been historically located at the PHSB district are either non-operational or have been removed. The existing boiler is exempt from BAAQMD permitting requirements and federal performance standards because the unit has a heat-input capacity of less than 10 MMBtu/hr. The tenant's printing and metal casting operation is also exempt from permitting because of its small capacity and minimal potential emissions (BAAQMD 2000).

### 3.5.2 ENVIRONMENTAL CONSEQUENCES

Air quality impacts of land use and development under the PTMP are assessed on pages 252 to 260 of the PTMP EIS. This assessment is incorporated here by reference. The PTMP EIS is supplemented here by analysis of issues specific to the PHSB project alternatives under consideration.

#### 3.5.2.1 Requested No Action Alternative

Under this alternative, essentially no demolition or replacement construction would occur and the only sources of emissions would be similar to those that currently exist. Minor amounts of traffic-related emissions would occur because buildings that have been rehabilitated and occupied in recent years would be leased out. Stationary sources would be limited to the existing boiler system and tenant operations, because there would be no residential uses. Emissions that would be caused throughout the region by motor vehicle trips attributable to the Requested No Action Alternative have been estimated using the URBEMIS2002 emission model developed by the CARB; results are shown in Table 18. Because the emissions would be minor, the Requested No Project Alternative would not adversely affect localized concentrations of any contaminant or disrupt air quality management plans within the region.

#### 3.5.2.2 Alternative 1: PTMP Alternative

Under this alternative, no building demolition or replacement construction would occur. Limited emissions from rehabilitation of existing buildings (with this alternative and Alternatives 2, 3, and 4) would warrant control. Consistent with BAAQMD recommendations for construction activity (BAAQMD 1999), rehabilitation activities having the potential to cause dust (PM<sub>10</sub>) emissions (e.g., for infrastructure upgrades, which could cause small amounts of ground disturbance) would be subject to basic control measures (PTMP EIS Mitigation Measure NR-20).

Motor vehicle use and operation of minor stationary sources would be associated with the new uses (with this alternative and Alternatives 2, 3, and 4). Emissions from traffic at congested intersections can, under certain circumstances, cause a localized build-up of CO concentrations. Although regional monitoring