

Appendices

Appendix A
Responses to Comments

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Appendix A. Response to Comments

This appendix summarizes and responds to public comments received by the Trust on the PHSH proposed action at different stages and in different contexts. As described in Section 4, the proposed action has been scoped twice, first as part of the preparation of an Environmental Assessment (EA) and again as part of preparing this Draft Supplemental Environmental Impact Statement (SEIS). Responses to the EA scoping comments are provided in Section 4.1 (pages 185 through 195) of the February 2004 EA. Other public comments are summarized and responded to below.

The EA for the PHSH project was circulated for public review from February 25, 2004 to April 30, 2004, and was the subject of a public meeting on April 14, 2004. During the course of public review, the Trust received 183 written comment letters and e-mails in addition to oral testimony at the public meeting. All comments on the EA are available for public review in the Presidio Trust Library at 34 Graham Street, and were reviewed and considered by the Trust prior to its decision to prepare this Draft SEIS. The comments were also used to inform preparation of the Draft SEIS and the additional environmental analyses that it contains. For example, at the request of public commenters, the Trust has included an additional “no action” alternative (i.e., the Requested No Action Alternative), included more comparisons between all of the alternatives, and incorporated additional information and analysis related to potential traffic impacts.

Following the decision to prepare this Draft SEIS, the Trust invited comments on the scope of the analysis. The scoping period extended from May 25, 2004 to July 7, 2004, and included a public meeting on June 29, 2004. During the scoping period, the Trust received 114 written comment letters and e-mails in addition to oral testimony at the public meeting. All of these comments are also available for public review in the Presidio Trust Library, and were used to inform preparation of the Draft SEIS.

This appendix explains how scoping comments and comments on the EA were used to modify or expand the environmental analysis presented in the SEIS, and also explains the Trust’s response to comments that did not result in additional analysis. Because many comments addressed the same or similar issues, they have been grouped and summarized under general topic headings. Responses immediately follow each comment summary. Where the comments lead to additional environmental analysis or relate to a specific section(s) of the Draft SEIS, the response identifies the relevant section(s).

A.1 Alternatives

A.1.1 RELATIONSHIP TO THE ORIGINAL PLAN

Richmond Presidio Neighbors (RPN) asked the Trust to address why it has abandoned the development plan for the project site, with its limit of 210 residential units, as described in the PTMP. RPN pointed out that the current preferred alternative apparently diverges from the PTMP because it includes up to 350

units, contains no educational component, retains the non-historic wings, and adds paved areas to accommodate the increased number of residents.

Response – The Presidio Trust has not “abandoned” its original plan, but is instead analyzing five different alternatives for the PHSB site that could achieve the management plan’s goals for the district to varying degrees. The draft management plan that was circulated for public review in July 2001 called for the PHSB district to be used as an educational and residential community. In response to public comments at that time urging more residential use, the final plan (PTMP) that was adopted in August 2002 preserved the concept of a mixed educational and residential community, but stated a preference for residential use. The preference for residential use is explained in the Record of Decision (ROD), and responded to neighbors concerns about the high-intensity traffic-generating characteristics of educational uses. See ROD, Attachment 3, page 2; also see PTMP EIS Volume II, page 4-194, which describes the land use preference for the PHSB and notes “the actual number of units that could be provided will take further site-specific analysis, including a detailed assessment of the historic building and rehabilitation requirements.” Notably, the analysis of Alternative 1, the PTMP Alternative, in this Draft SEIS bears out the neighbors’ earlier concerns, because with over 150,000 square feet of cultural/education use, it would generate far more traffic than any of the other, principally residential alternatives, even the alternative with 350 units.

The PTMP permitted but did not specifically call for removal of the non-historic wings of Building 1801 as proposed in two of the Draft SEIS alternatives, and also did not preclude the addition of paved areas in some locations and their removal in others as proposed in all alternatives. The relationship of all Draft SEIS alternatives to the PTMP is discussed further in Section 3.1, Land Use, Housing, and Schools.

A.1.2 ELIMINATION OF THE PTMP ALTERNATIVE

Neighborhood groups said that the PTMP Alternative should be eliminated altogether from the environmental document, citing a number of different reasons. These commenters claimed that including the PTMP Alternative is misleading and inappropriate because (a) the PTMP EIS alternative is flawed, (b) it is merely a hypothetical future implementation plan with no development proposals supporting its implementation, and (c) reliance on the PTMP as a basis for comparing the alternatives obscures actual differences among the PHSB alternatives. The Lake Street Residents Association (LSRA) stated that using the PTMP Alternative as a “point of departure in considering other project options is offensive and makes a mockery of the environmental review process.”

Response – The Trust has considered commenters’ suggestions to eliminate the PTMP Alternative (Alternative 1) from the Draft SEIS. It has been retained not only because it provides valuable information to the public and the decision-makers, but also because the PTMP Alternative is the legally required “no action” alternative that must be analyzed in accordance with the National Environmental Protection Act (NEPA). In response to the public’s requests, the Trust has gone beyond what is legally required by the NEPA (the “no action” alternative represented by the PTMP Alternative) to include an alternative suggested by some members of the public (the Requested No Action Alternative), thereby

addressing both of the sorts of alternatives contemplated by the Council on Environmental Quality (CEQ) in its “Forty Questions” guidance (Question 3) (CEQ, “Forty Most Asked Questions Concerning CEQ’s NEPA Regulations” [46 Fed. Reg. 18026 (March 23, 1981, as amended) 51 Fed. Reg. 15618 (April 25, 1986)]).

The inclusion of Alternative 1 allows the Trust and the public to see whether the other alternatives fall within the intensity of impacts associated with the adopted management plan as it was defined in the PTMP EIS. It therefore provides important information in assessing consistency of the PHS project alternatives and with the comprehensive land use vision of the PTMP.

Nevertheless, the Trust has carefully considered the underlying concerns of the many commenters who objected to including the PTMP Alternative as a form of the “no action” alternative. In each instance, these comments note that use of the PTMP was misleading because it obscured actual differences among alternatives. The underlying concern in these comments is the desire for the Trust to disclose in the present Draft SEIS document, how today’s environmental conditions would change as a result of implementing the various PHS alternatives. Although the EA made an attempt to provide this information by describing changes between the “affected environment” described in Section 2 of the EA and the alternatives in Section 3, this information was not provided in the context of a separate alternative.

The Draft SEIS has addressed commenters’ criticisms and requests for clearer information by including an additional form of “no action” alternative, which is referred to in the Draft SEIS as the Requested No Action Alternative. The new alternative assumes that the PHS project would not be implemented, and therefore no rehabilitation or leasing of the buildings beyond those recently and currently occupied and no associated improvements of landscapes within the project site would occur. By adding what is essentially a “no project” alternative, the public will now be able to more directly compare the effects of Alternatives 1, 2, 3, and 4 not only against the level of management and activity assumed in the PTMP EIS, but also against present-day conditions as they would be expected to change without the project.

Inclusion of both the Requested No Action Alternative and the PTMP Alternative effectively meets both of CEQ’s interpretations of the no action alternative (see Forty Questions, Question 3 and Response to Comment A.2.2 below). For these reasons, the PTMP Alternative is being retained.¹

¹ Some comments assert that the PTMP analysis is flawed and cannot be relied upon for the present PHS proposal. They note that certain land use assumptions in the PTMP differed from assumptions made for purposes of the environmental review of that alternative in the PTMP EIS. The discrepancy is immaterial because in any instance where land use assumptions differed, the PTMP EIS analyzed a land use mix that resulted in greater impacts than would have resulted from the modified assumptions in the PTMP. Therefore, if there is any flaw at all in the PTMP, it is in overestimation or overstatement of potential environmental impacts of the PTMP.

A.1.3 ELIMINATION OF THE BATTERY CAULFIELD ALTERNATIVE

The Pacific Heights Residents Association and others suggested that the Trust eliminate Alternative 4 from further consideration because it calls for new construction on Battery Caulfield, and because eliminating an alternative would reduce the Trust's planning expenses.

Response – The Trust has considered the commenters' suggestion but elected to retain Alternative 4, the Battery Caulfield Alternative, in this Draft SEIS. Alternative 4 allows the Trust and the public to assess the relative merits of a reasonable approach to development in the PHSB district – that is, removal of the non-historic wings of Building 1801 coupled with their replacement elsewhere on the site. While this approach is not preferred by the Trust, its inclusion is instructive. Alternative 4 is also being retained because it includes age-restricted (senior) housing, an important request of other commenters. Including senior housing in at least one alternative provides information that permits the Trust to consider selecting an alternative that includes senior housing if desired.

A.1.4 COMPLETE DEMOLITION ALTERNATIVE

One commenter suggested that an alternative be included in the NEPA analysis that would demolish and completely remove the PHSB building (Building 1801). The commenter believed that by adding this new alternative, the relative advantages of the other alternatives would be more clearly revealed and choices between and among them facilitated.

Response – The Trust considered the commenter's suggestion and has determined that evaluating a complete demolition alternative in this Draft SEIS is not warranted because a complete demolition alternative was previously analyzed as part of the Trust's comprehensive planning process in 2002.

The PTMP EIS included an alternative (the Resource Consolidation Alternative) that proposed demolition and removal of the entire hospital building as well as other buildings within the PHSB district. The PTMP EIS's evaluation of the effect of that action on historic resources concluded that removal of the PHSB building would constitute a significant adverse effect on an historic building and that its removal together with all other historic buildings within the district would impair the integrity of the National Historic Landmark District (NHL). The Trust in the end adopted a final plan (the PTMP) that called for rehabilitation and reuse of the PHSB district's historic buildings if feasible in order to forestall the noted adverse effects. The policy decision to retain, rehabilitate, and reuse Building 1801 was therefore made as part of the recently adopted PTMP, and there is no compelling need to revisit the decision unless the building's retention is determined to be infeasible at some future date (also see Section 2.9.5).

Moreover, as this Draft SEIS tiers from the PTMP EIS, the information in the PTMP EIS, which analyzes the environmental effects of demolishing Building 1801, is incorporated into the project-specific analysis and provides most or all of the information that the commenter suggests would be relevant now in making the PHSB site-specific project decision. NEPA guidance expressly discourages duplicate analysis that can

be avoided through the process of tiering a later project-specific document from an earlier EIS (see Forty Questions, Question 24c).²

A.1.5 DISTRICT-WIDE PLAN ALTERNATIVES

A number of commenters, including the Planning Association for the Richmond (PAR) and the Neighborhood Associations for Presidio Planning (NAPP), requested that the Draft SEIS evaluate alternatives that encompass district-wide planning. They urged the Trust to maintain Battery Caulfield as open space and a natural area to protect nearby quail habitat and native plant communities. The same commenters requested, alternatively, that consideration be given to merging Battery Caulfield into the South Hills district, and specifying the area for open space and recreation per the PTMP.

Response – As described in Section 2.9, Other Alternatives, the scope of actions for decision under this SEIS is the extent and configuration of building development and building-related landscape changes within the project site. If the Battery Caulfield site is not needed for replacement construction as part of the PSHH project, there is not currently funding available to transform the site from a maintenance yard to open space. Also, there is no agreement regarding the form that open space would take (e.g., native plants or recreation area). Consideration of the options would involve further planning and analysis that go well beyond the scope of the current analysis, and would require more resources than are currently available.

This EIS is not being relied upon to make site-specific decisions about all future resource management or open space for the entire PSHH district. The project site has been defined to encompass only previously developed areas potentially suitable for building development and actively managed landscapes. Battery Caulfield is included within the project site for the limited purpose of deciding whether development in that area is warranted as part of the proposed action – preservation, rehabilitation and reuse of buildings within the PSHH district. The Trust is not yet prepared to make all district-wide site-specific planning decisions as part of the present more limited building rehabilitation, and reuse project. In the future, when other district decisions are proposed, the Trust will refer again to the PTMP to guide its actions, but nothing now requires the Trust to make all district-wide site-specific management decisions as part of the present proposal (see also Section 2.9.6).

A.1.6 ALTERNATIVE WITH TRUST AS DEVELOPER, 210 UNITS, AND NO “WINGS”

A number of commenters asked the Trust to consider a new alternative that would develop the project site with up to 210 residential units, remove the non-historic wings, and rehabilitate all the buildings other than the hospital, with the Trust serving as developer. In the commenters’ view, the Trust cannot meet its

² Before the PTMP EIS, the NPS also considered the issue of reuse of the hospital. An alternative in the NPS GMPA EIS proposed removal of the hospital complex from the boundaries of the park. There too the NPS, in its selection of the final GMPA (Alternative A), concluded that retaining and reusing the buildings in the PSHH district, including the hospital building, was preferred over losing the PSHH district’s historic structures (see also Section 2.9.2 of this Draft SEIS).

obligations to the public without considering creative financial solutions that could eliminate the need for maximizing the build-out of the PHSB district.

Response – As explained in Section 2.9, Other Alternatives, the potential physical impacts of an alternative with 210 units and no “wings” is included within the range of alternatives under consideration in this Draft SEIS. Also, the Trust intends to evaluate and consider contributing its own funds to the PHSB project in order to achieve greater rents. However, there are a number of reasons, including the availability of capital and the availability of certain financing mechanisms, that suggest a fully Trust-funded project would not presently be feasible or advantageous (see also Section 2.9.10).

A.1.7 NO CONDOMINIUMS

Numerous commenters urged the Trust to exclude the concept of allowing long-term leasehold condominiums within the park. These commenters offered that “privately-owned housing units” should be considered “entirely inappropriate in a national park.”

Response – The comments are noted. It is the purpose of a NEPA document to examine environmental impacts, which in this case involve building rehabilitation and reuse and associated physical site changes. It is the physical properties of the alternatives that cause or do not cause environmental impacts, not the nature of the financial arrangement by which the tenant pays for use of the buildings.

At the present time, the Trust is considering the potential physical impacts of five possible alternatives for the PHSB district and has not determined how the selected alternative will be financed. In selecting Forest City Development as the entity with which to enter exclusive negotiations, the Trust selected a development partner with rental housing experience and one that has expressed interest in the project as a rental – rather than a leasehold condominium – project.

A.1.8 DIFFERENT TENANT DEMOGRAPHICS AND HOUSING TYPES

A number of commenters noted that various changes in tenant mix would alter the impacts of each alternative. They urged the Trust to consider a higher level of senior housing as a way to reduce traffic volumes, and to assess the impacts of each development alternative based on different tenant demographics, i.e., independent senior, assisted-living senior, and market-rate tenants. One commenter asked the Trust to consider an alternative that would set aside all units over 150 for seniors. Another asked the Trust to look at alternative scenarios with larger units catering to larger families, rather than singles and couples. The National Park Service (NPS) supported the investigation of measures that could further reduce the volume of traffic generated by considering a higher level of senior independent and assisted living units.

Response – As explained in Section 2.9, Other Alternatives, senior housing is included within the range of alternatives in this Draft SEIS. The information requested can be derived by combining the footprint of one alternative (Alternative 2 or 3) with the housing mix of another (Alternative 4). The number of

peak hour vehicle trips associated with one unit of senior housing is about half the number associated with one unit that is not age-restricted. Thus, this information can be applied to other hybrid alternatives. Incorporating senior units in some measure into Alternatives 2 and 3 would generate less traffic than is currently reported, but would have the same impacts on cultural resources, visual quality, and other resource topics related to the footprint or configuration of the alternative (see also Section 2.9.11).

The ultimate decision about whether to adopt such an alternative cannot be made until the environmental review process is complete, and will have to consider the ability of such an alternative to address all aspects of the project purpose and need. For example, inclusion of age-restricted units can eliminate eligibility of residential projects for a certain type of bond financing, and can therefore affect the financial feasibility of senior or assisted living developments.

A.1.9 PARK PRESIDIO BOULEVARD ACCESS VARIANT

Many commenters suggested that the Park Presidio Boulevard Access Variant should be a mitigation measure and a condition of project approval. Some suggested it was required as mitigation for any alternative with more than 230 dwelling units. Others supported the Trust's pursuit of the variant, suggesting it as a necessary safety improvement.

Response – As demonstrated by the traffic analysis in Section 3.2 of this Draft SEIS, the Park Presidio Boulevard Access Variant is not needed to reduce or eliminate significant impacts of any alternative, although it would reduce delay at some local intersections under all alternatives, including the two-way stop-controlled intersection of Lake Street/Funston Avenue, where conditions at the minor approach would improve from level of service (LOS) E to LOS D. In fact, under Alternative 1 (the PTMP Alternative), addition of the Park Presidio Boulevard Access Variant would worsen conditions at the intersections of Lake Street/Park Presidio Boulevard (PM peak hour) and California Street/15th Avenue (AM peak hour).

The Park Presidio Boulevard Access Variant is not a condition of the proposed project because its approval is not within the control of the Trust; the variant would require Caltrans' approval. Nonetheless, this variant is being pursued by the Trust as a way to address neighborhood concerns about traffic volumes in the immediate vicinity of the 14th/15th Avenue Gates and concerns about safety at the intersection of Lake Street/Park Presidio Boulevard.

A.2 Environmental Review Process

A.2.1 EA VS. EIS

Neighborhood groups contended that a project of this magnitude requires the Trust to prepare an EIS because there are substantial questions about whether the project may have significant effects as determined by considering the context, setting, and intensity. These commenters believed that several of

the alternatives would have significant impacts on traffic, natural resources, historic resources, and park use that require the preparation of an EIS. These and other commenters also asserted that the Trust could not proceed in the NEPA process by relying upon the EA as the basis for issuing a Finding of No Significant Impact (FONSI), as there are substantial questions about whether Alternatives 1, 2, and 4 would result in significant adverse impacts and whether potential impacts could be adequately mitigated.

Response – The NEPA directs that a federal agency examine the environmental impacts of any major action it undertakes. If the agency determines the action may have a potentially significant adverse effect, then it must prepare an EIS. When reviewing a proposed federal action, in order to comply with the NEPA, a federal agency may, if unsure about the potential effects of a proposal, first prepare an EA to determine whether an EIS is necessary. Alternatively, the agency may choose to proceed directly and voluntarily to the preparation of an EIS. Here, the Trust elected first to prepare and issue an EA.

On the basis of the EA and public comments, the Trust elected not to finalize the EA, but to prepare an EIS as the basis for consideration of the potential environmental effects of the proposal. In particular, this Draft SEIS was prepared to obtain more information to determine whether the identified traffic impacts rise to the level of significance.

A.2.2 PTMP VS. EXISTING CONDITIONS AS THE NO ACTION ALTERNATIVE

RPN, NAPP, and the Lake Street Residents Association (LSRA) maintained that the Trust’s presentation of the PTMP land use scenario as the “no action” alternative in the EA is a legally incorrect baseline for comparison against the project alternatives. They claimed that the project site’s present condition, including the impacts of existing and perhaps recent tenants, is the legally required no action alternative. In support, the commenters referred to CEQ’s NEPA guidance stating that no action is “no change” from current management direction or level of management intensity, asserting that the Trust’s management direction is best exemplified by an alternative showing the project site’s existing conditions.

Response – For a variety of reasons, the commenters’ assertion that “existing conditions” is the legally required no action alternative in this instance is not correct. Section 1502.14(c) of the CEQ’s NEPA regulations requires an evaluation of the no action alternative in the analysis of alternatives. In determining the no action alternative for the PHS proposal, the Trust relied upon CEQ’s NEPA guidance. CEQ is the entity responsible for overseeing federal agencies that implement the NEPA, and issues guidance to federal agencies concerning NEPA compliance.

In the 1980s, more than a decade after NEPA was enacted in 1969, CEQ issued its NEPA guidance entitled “Forty Most Asked Questions Concerning CEQ’s NEPA Regulations” (46 Fed. Reg. 18026 [March 23, 1981, as amended], 51 Fed. Reg. 15618 [April 25, 1986]). Question 3 provides the CEQ’s guidance on the no action alternative, addressing the question, “What does the ‘no action’ alternative include?” The CEQ answered the question as follows:

There are two distinct interpretations of “no action” that must be considered, depending upon the nature of the proposal being evaluated. The first situation might involve an action ... where

ongoing programs initiated under existing legislation and regulations will continue, even as new plans are developed. In these cases, “no action” is “no change” from current management direction or level of management intensity. To construct an alternative based on no management at all would be a useless academic exercise. Therefore, the “no action” alternative may be thought of in terms of continuing with the present course of action until that action is changed. Consequently, projected impacts of alternative management schemes would be compared in the EIS to those impacts projected for the existing plan. In this case, alternatives would include management plans of both greater and lesser intensity, especially greater and lesser levels of resource development.

The second interpretation of “no action” is illustrated in instances involving federal decisions on proposals for projects. “No action” in such cases would mean the proposed activity would not take place, and the resulting environmental effects from taking no action would be compared with the effects of permitting the proposed activity or an alternative activity to go forward.

In the EA, the Trust considered both interpretations and identified the PTMP Alternative (i.e., Alternative 1 in the EA) as the required no action alternative. Having recently established a comprehensive management plan (the PTMP) designed to address and implement the requirements of the Trust Act, the Trust determined that CEQ’s first interpretation of no action is applicable here, where the proposed action is for the purpose of implementing the Trust’s ongoing plan. As part of the PTMP planning process, the Trust considered and evaluated alternative management proposals and adopted a general management direction and expected level of management intensity for the PSHH district, just as CEQ’s first interpretation contemplates.

The PTMP provides a direction for the PSHH district to be managed within the analyzed level of management intensity, which would involve rehabilitation and leasing of district buildings, increased levels of traffic as compared to the present, and potential effects on resources that would need mitigation as a result of increased human activity in the district. These potential impacts were identified and previously analyzed in the PTMP EIS. Nowhere does the PTMP, the adopted management plan for Area B, contemplate that the management direction or level of management intensity within the PSHH district would involve no management or no change at all. Furthermore, as a general management approach, allowing irretrievable deterioration of historic buildings in an NHLD runs afoul of the Trust Act mandate to protect the historic and cultural resources of the Presidio. Thus, as the CEQ guidance indicates, where a level of management intensity has been previously established, as here, “[t]o construct an alternative based on no management at all would be a useless academic exercise.” CEQ concludes, as did the Trust in identifying the PTMP as the no action alternative, “projected impacts of alternative management schemes would be compared in the [EA/]EIS to those impacts projected for the existing plan,” in this instance the “existing plan” being the PTMP.

The Trust considered CEQ’s second interpretation of no action, but believes it is not legally required here given the nature and circumstances of the PSHH proposal. Here, the Trust has previously adopted a management direction for the PSHH district, and the option of doing nothing and allowing present conditions to continue would arguably be legally inconsistent with the Trust’s enabling legislation.

Moreover, to accept the commenters' no action interpretation as legally required would be to undo the benefits of tiering a later more specific proposal against a previously completed, more general plan. CEQ's NEPA regulations, and guidance elucidating the regulations, encourage the use of tiered documents to eliminate repetitive discussions and to exclude from consideration issues already decided (see 40 CFR 1502(20) and 1508.28; see also Forty Questions, Question 24c). "The tiering process would make each EIS of greater use and meaning to the public as the plan or program develops, without duplication of the analysis prepared for the previous impact statement" (Question 24c). Here, the PTMP EIS, completed only two years ago, disclosed the differences between "existing conditions" at the project site and alternative management schemes, including the PTMP alternative adopted as the plan. Thus the analysis comparing PTMP to existing conditions has already been done in the PTMP EIS. If in every instance where there is already an existing general management plan and accompanying EIS, the NEPA were to require that an agency consider no action as "existing conditions," then the agency would be duplicating the previous analysis that was part of the earlier program-level EIS. The CEQ would not have created and would not encourage the concept of tiering the more detailed proposal to a more general plan if duplicative and repetitive analysis were the intended result of every no action alternative or every project-specific EIS.

Furthermore, the comments urging "existing conditions" as the required no action baseline mistakenly interpret the word "current" in CEQ's first interpretation above to mean the actual present physical conditions of the environment. When considered in context, the word "current" refers to "management direction" and "expected level of management intensity" both of which imply a future condition as established by an "existing plan," which here is the PTMP.

For all of these reasons, there is sufficient legal basis under the NEPA for the Trust to identify and rely on the PTMP Alternative as the no action alternative required by Section 1502.14(d) of CEQ's NEPA regulations. Nonetheless, the Trust has included an alternative along the lines suggested by the commenters (i.e., the Requested No Action Alternative), and has included in the transportation responses below a comparison of existing conditions to an "existing plus project" scenario for each Draft SEIS alternative.

A.2.3 BASELINE FOR IMPACTS ASSESSMENT

RPN and several others stressed that to accurately assess the impact of the PHS development on the surrounding natural and city environs, the Trust should use conditions existing as of July 2004 as the no action baseline in the EIS. They urged the Trust to compare alternatives against current use (with the majority of the buildings vacant).

Response – For purposes of assessing impacts, the Draft SEIS provides two forms of "no action," and has also included information about existing conditions within the affected environment descriptions in Section 3. Thus, the Trust and the reader may compare the environmental effects of alternatives against the allowable impacts as analyzed in the PTMP Alternative, against existing conditions, and against the "no project" scenario included as the Requested No Action Alternative. In the instance of traffic, the

PTMP baseline and the Requested No Action baseline both assume growth that would occur regardless of the project because the Trust has no control over this inevitable growth. In addition, in response to public comments, the Trust has presented an “existing plus project” analysis within the transportation responses below.

A.2.4 COMPARISONS AMONG THE ALTERNATIVES

Several commenters suggested that better delineation of impacts was needed so that more meaningful and additional comparison of the alternatives could be provided. Specifically, the PAR, NAPP, and RPN stated that in addition to comparing alternatives against the no action alternative, the environmental analysis should also include comparisons among the project alternatives that clearly identify environmental differences among them. RPN asked the Trust to specifically compare the impacts of Alternatives 2 and 3 because they are the “only alternatives under any serious consideration...”

Response – The EA provided the necessary information to compare all alternatives, as demonstrated by the many written and oral comments that offered opinions regarding their relative merit. Nonetheless, reviewers have asked the Trust to make the alternatives comparisons clearer and more explicit. The Trust has responded by adding additional textual comparisons and a summary table providing comparative information about the alternatives and their potential impacts.

A.2.5 MITIGATION MEASURES OUTSIDE TRUST JURISDICTION

RPN commented that the Trust could not proceed with a FONSI based on implementation of mitigation measures outside of its control. RPN and PAR also suggested that the Trust could not proceed with a FONSI based on implementation of the Park Presidio Boulevard Access Variant, since it is subject to approval by Caltrans and that agency has expressed reservations about it.

Response – The Trust has not proceeded to a FONSI, but has decided to prepare an EIS. The Draft SEIS appropriately identifies all reasonable mitigation measures, even if they are outside of the Trust’s control (i.e., if they require City approval). The subsequent Record of Decision (ROD) will also identify the agency responsible for implementation. This is a similar approach – and the measures are similar measures – to that used in the PTMP EIS. Traffic measures within the jurisdiction of the City and County of San Francisco have been and continue to be discussed with the City’s Department of Parking and Traffic (DPT), and have been adjusted since publication of the PTMP EIS to reflect DPT’s input.

As demonstrated by the traffic analysis in Section 3.2 of the Draft SEIS and explained above, the Park Presidio Boulevard Access Variant is not required to reduce or eliminate impacts of Alternatives 1 through 4. Instead, this variant is being pursued by the Trust as a way to address neighborhood concerns about traffic volumes and safety. Caltrans has neither approved nor disapproved the variant at this time, and the Trust and its engineering consultants continue to pursue its design and implementation.

A.3 Transportation

A.3.1 NEW TRAFFIC ANALYSIS BASELINE

Several commenters thought the traffic analysis must be based upon current conditions to accurately assess traffic impacts, and that therefore the Trust should re-measure traffic counts under current (July 2004) conditions.

Response – Section 3.2.1 explains the sources of data used in the traffic analysis. Traffic counts in some locations were taken quite recently, while counts in other locations were taken several years ago. All counts have been reviewed and compared with other relevant data sources, such as the traffic analysis being performed for replacement of Doyle Drive, and are considered reflective of existing conditions.

A.3.2 TRAFFIC VOLUMES WITHIN THE PRESIDIO

One commenter suggested that the impacts of the Park Presidio Boulevard Access Variant were not adequately analyzed due to the potential for increased cut-through traffic by residents and tenants in other areas of the Presidio. Another asked the Trust to analyze the effects on other parts of the Presidio of the increased use of “avoidance routes” such as Washington Boulevard.

Response – A small amount of traffic from other parts of the Presidio was assumed to use the Park Presidio Boulevard Access Variant to reach Highway 1, and the analysis in the Draft SEIS accounts for the effect of this traffic. However, the amount of traffic expected to use the intersection from other parts of the Presidio, including traffic that travels along Washington Boulevard, is very small because the driving distance to the Golden Gate Bridge Plaza is shorter than to the Park Presidio access intersection for many other parts of the Presidio.

A.3.3 CUMULATIVE TRAFFIC VOLUMES

Several commenters asked the Trust to consider the cumulative traffic volumes (and therefore impacts) associated with the project alternatives in combination with other anticipated projects (such as eventual Fort Scott reuse) and with the City’s proposed Housing Element.

Response – The traffic analysis in the Draft SEIS includes growth in traffic volumes at study intersections that is associated with trends in population and employment in the Bay Area region, including population and employment increases within the Presidio over time (such as Fort Scott reuse), precisely so as to address cumulative impacts. The City’s Housing Element is a policy document intended to identify ways the City can accommodate the same population and employment trends. These trends are delineated by the Association of Bay Area Governments (ABAG) based in part on their estimate of land available for housing development and job growth and are sufficiently aggressive (large) to encompass occupancy of Fort Scott and other changes within the Presidio. The Draft SEIS

transportation analysis assumes 6-percent growth in AM peak hour volumes and 11-percent growth in PM peak hour volumes associated with regional trends. This growth in non-project traffic is also sufficiently large to encompass traffic growth associated with the immediate area's share of the projected growth in San Francisco, where the population is expected to increase from 776,733 in 2000 to 811,100 in 2020 (an increase of 4.4 percent) according to recent ABAG projections. Therefore, the cumulative traffic effects of not only Presidio-wide growth, but also city growth, are considered in the SEIS.

A.3.4 TRAFFIC IMPACTS

Several neighborhood organizations asked the Trust to compare differences in traffic effects among the alternatives and, short of certainty of implementation of the Park Presidio Boulevard Access Variant, to consider placing a tiered use limit on the PHSB project that would link maximum occupancy of the project site to specific traffic mitigation measures. Commenters suggested that the influx of new residents within the PHSB district would create significant parking, traffic, and pedestrian safety issues on City streets, which would have to be mitigated with City resources.

Response – The Park Presidio Boulevard access is discussed as a variant of Alternatives 1 through 4, and is not a mitigation measure because it is not required to alleviate traffic congestion, as demonstrated by the intersection analysis presented in Section 3.2. Even though the alternatives encompass a range in number of residential units, the forecasted levels of service at the study intersections are almost identical under all of the alternatives, suggesting that the effects of Alternative 3 on the operation of nearby intersections would not be discernibly different from the effects of Alternatives 1, 2, and 4. Adding the Park Presidio Boulevard Access Variant does not change the forecasted levels of service, except in three locations under Alternative 1 (the PTMP Alternative) and one location under Alternatives 2, 3, and 4. Additional text is included in Section 3.2 of the Draft SEIS to describe the differences in the number of trips that would be generated by the PHSB district under the various alternatives. The analysis also demonstrates that the level of service of area intersections would be similar or identical under all PHSB alternatives, and that significant traffic congestion and delays would occur at several locations in the future whether or not the project proceeds (i.e., with the Requested No Action Alternative). No significant impacts related to parking or pedestrian safety have been identified. Thus, a tiered use limit on the PHSB project would not be necessary to address significant traffic, parking, or pedestrian impacts.

A.3.5 ADDITIONAL STUDY INTERSECTIONS

Several commenters asserted that the traffic analysis presented in the EA was insufficient to support a FONSI if limited to only a few intersections. They asked that the traffic analysis also address impacts on other nearby intersections, such as Lake Street and 10th through 18th Avenues including Funston Avenue.

Response – At the commenters' request, the intersections of Lake Street/Funston Avenue and Lake Street/17th Avenue have been incorporated into the SEIS traffic analysis. The intersection of Lake Street/17th Avenue was added because 17th Avenue is the street at which traffic would likely turn left or right in order to cross California Street because of the all-way stop control at the intersection of California

Street/17th Avenue. The intersection of Lake Street/Funston Avenue was added to the analysis in order to assess the effects of traffic traveling to and from the PHSB district given the prohibition of left turns from Park Presidio Boulevard. Given the relatively small number of vehicle trips generated by the alternatives, the increased dispersion of project-generated traffic at increased distances from the PHSB district, and the relatively low volume of traffic at other intersections on Lake Street beyond these intersections, the addition of all of the intersections requested by the commenters cannot be expected to show discernable effects. Therefore, the addition of the two intersections of Lake Street/Funston Avenue and Lake Street/17th Avenue is considered adequate to fully assess the effects of the alternatives on neighborhood streets.

A.3.6 CITY TRANSPORTATION GUIDELINES

One neighborhood organization asserted that the traffic analysis does not accurately assess traffic impacts on the surrounding neighborhood because it fails to apply San Francisco's Transportation Impact Analysis Guidelines, October 2002 ("SF Guidelines"). The organization suggested that the SF Guidelines more accurately reflect local transportation patterns, and that because proponents for projects in San Francisco are required to prepare a report based on the SF Guidelines, any study intended to accurately estimate traffic impacts on City streets and intersections should rigorously adhere to the SF Guidelines. The organization's independent traffic consultant suggested that by not applying the SF Guidelines, Alternative 2's vehicle trips in the afternoon peak hour were underestimated by 23 percent.

Response – The traffic analysis in the EA and Draft SEIS uses the San Francisco's Transportation Impact Analysis Guidelines (SF Guidelines) as one among several sources for travel demand characteristics of the PHSB district. The travel demand characteristics provided in the SF Guidelines do not accurately reflect the Presidio's environment in all cases, nor do the SF Guidelines include trip generation rates for the AM peak hour. For these reasons, information from other standard data sources accepted and commonly used by traffic analysis professionals, such as the State of California Department of Transportation (Caltrans) and the Institute of Transportation Engineers (ITE), as well as the City of San Diego, were also considered (see Table A-1).

The trip generation rates chosen for the PHSB traffic analysis are in fact very similar to the trip generation rates provided in the SF Guidelines, with the only material difference being the PM peak hour trip generation rate for residential uses. The daily trip generation rate for a residential unit in the SEIS analysis is the same as that provided in the SF Guidelines for a two-bedroom residential unit, but rather than assuming that 17.3 percent of the daily trips to and from a residential unit would occur in the PM peak hour, the PHSB transportation analysis assumes a smaller percentage of trips – 10.5 percent – would occur in the PM peak hour. The results of using these rates are that daily trips associated with all dwelling units are the same as would be projected using the SF Guidelines, but the percentage occurring within the afternoon rush hour is about 6.8 percent less. The lesser percentage and the results achieved through its application are considered more reasonable by the Trust's transportation professionals and consultants because they are consistent with the ratio of PM peak hour trip generation rates to daily trip generation rates for residential uses from all other sources considered (see table below for sample data).

Also, the City’s assumption of 17.3 percent as the percentage of daily traffic that would occur in the PM peak hour could not be substantiated by a review of the 1992 Citywide Travel Behavior Survey, which is one of the data sources for the SF Guidelines.

Table A-1. Trip Generation Data

	WEEKDAY TRIPS / UNIT	NUMBER OF STUDIES	WEEKDAY- PM PEAK HOUR TRIPS / UNIT	NUMBER OF STUDIES	PM PEAK HOUR PERCENTAGE OF DAILY TRIPS
Institute of Transportation Engineers Trip Generation Manual (Sixth Edition)					
Single-Family Detached Housing	9.57	348	1.01	294	10.6%
Apartment	6.63	80	0.62	78	9.4%
Low-Rise Apartment	6.59	22	0.58	26	8.8%
High-Rise Apartment	4.20	9	0.35	17	8.3%
Residential Condominium/Townhouse	5.86	53	0.54	57	9.2%
High-Rise Residential Condominium/Townhouse	4.18	4	0.38	5	9.1%
Mobile Home Park	4.81	37	0.56	24	11.6%
The City of San Diego Trip Generation Manual					
<i>Multi-Family Dwelling Unit</i>					
Under 20 dwelling units per acre	8.00	n.a.	0.80	n.a.	10.0%
Over 20 dwelling units per acre	6.00	n.a.	0.54	n.a.	9.0%
<i>Single Family Detached</i>					
<i>Urbanized Area</i>	9.00	n.a.	0.90	n.a.	10.0%
Urbanizing Area	10.00	n.a.	1.00	n.a.	10.0%

A.3.7 TRAFFIC ASSIGNMENTS AND ANALYSIS OF THE PARK PRESIDIO BOULEVARD ACCESS VARIANT

One neighborhood group suggested that the Park Presidio Boulevard Access Variant must be analyzed more fully to provide more realistic estimates of the demand for Park Presidio access. The group suggested that the projected left-turn volume was underestimated in the analysis with the Park Presidio

Boulevard Access Variant, and that existing traffic patterns at nearby intersections such as the intersection of Lake Street/Park Presidio Boulevard should be used as a guide to estimate the turning movement volumes for the Park Presidio Boulevard Access Variant intersection. Another commenter contended that failure to require such alternate access would worsen the already significant adverse traffic impacts expected to occur on 14th and 15th Avenues and at the intersections on Lake and California Streets, among other locations. Another wished to see an evaluation of both a full service and a limited service intersection north of Lake Street.

Response – The transportation analysis in the EA and the Draft SEIS assumes that a relatively small portion of the traffic would exit the PHSB district onto northbound Highway 1, based on the assumption that only a small percentage of drivers exiting the PHSB district residential area would be traveling to Marin County or parts of the San Francisco Marina neighborhood. The SF Guidelines suggest that an estimated 60 percent of residents of San Francisco who work in San Francisco work in the downtown area. Year 2000 census data suggest that approximately 76 percent of the residents in the nearby San Francisco neighborhood work in San Francisco, and 23 percent work in other parts of the Bay Area. Year 2000 census data also suggest that only 2.3 percent of San Francisco residents commute to Marin, Napa, Solano, or Sonoma Counties. Data from the SF Guidelines suggest that the number of residents of the PHSB district working in the Marina district would also be relatively low. The traffic assignment assumptions in the EA and Draft SEIS are consistent with these figures. The transportation analysis for the EA and Draft SEIS assumes that, depending on the alternative, 4.3 to 7.3 percent of the traffic leaving the PHSB district via the new intersection in the AM peak hour would turn left onto Highway 1, and that 2.2 to 3.0 percent would turn left onto Highway 1 in the PM peak hour, depending on the alternative.

The commenter suggested that the percentage of traffic turning left at this location would be similar to the proportion of traffic turning left from Lake Street to Park Presidio Boulevard, which is 33 percent and 23 percent in the AM peak hour and PM peak hour, respectively, based on the most recent traffic counts available. However, if one were to consider the intersection of California Street/Park Presidio Boulevard, which is only one block away, as an example, the proportion of traffic turning left on to Park Presidio Boulevard is 13.5 percent in the AM peak hour and 13 percent in the PM peak hour.

In order to address the commenter's concerns, however, a supplemental traffic analysis using the higher percentage of vehicles turning left on Highway 1 has been completed. The analysis results suggest that an alternative traffic assignment with more traffic turning northbound from the PHSB site would have little effect on the operation of study intersections. As shown in Table A-2, the levels of service at all study intersections would be the same as with the traffic assignment patterns assumed in the Draft SEIS during both the AM and PM peak hours, except under Alternative 1, under which the intersection of Lake Street/14th Avenue would operate at LOS E rather than LOS F in the AM peak hour, and the intersection of Lake Street/Park Presidio Boulevard would operate at LOS D rather than LOS E. The alternative traffic assignment would result in little difference in the average delay per vehicle, which would be between 0.2 second more to 2.9 seconds less with the alternative traffic assignment, depending on the study intersection and alternative. A more detailed discussion of this traffic analysis is provided in

Table A-2. Intersection Levels of Service – Weekday AM and PM Peak Hour
 Year 2020 Sensitivity Analysis For Alternative Traffic Assignment
 Variant: New Park Presidio Blvd. Access with Inbound Only Traffic at 14th and 15th Avenue Gates

INTERSECTION	TRAFFIC CONTROL DEVICE	AM PEAK HOUR								PM PEAK HOUR							
		ALT. 1		ALT. 2		ALT. 3		ALT. 4		ALT. 1		ALT. 2		ALT. 3		ALT. 4	
		DELAY ^a	LOS														
Lake Street/15 th Avenue	4-Way Stop	23.7	C	21.5	C	21.2	C	21.0	C	19.0	C	17.4	C	17.0	C	16.8	C
Lake Street/14 th Avenue ^b	2-Way Stop	49.9	E	44.5	E	43.1	E	42.2	E	>90	F	>90	F	>90	F	>90	F
Lake Street/Park Presidio Boulevard	Traffic Signal	38.5	D	38.7	D	38.8	D	38.3	D	54.2	D	49.7	D	49.8	D	49.3	D
California Street/15 th Avenue ^b	2-Way Stop	35.0	E	32.1	D	31.9	D	31.7	D	49.1	E	42.7	E	41.0	E	39.7	E
California Street/14 th Avenue ^b	2-Way Stop	68.2	F	59.5	F	56.7	F	54.8	F	>90	F	>90	F	>90	F	>90	F
California Street/Park Presidio Boulevard	Traffic Signal	42.3	D	42.3	D	42.3	D	42.3	D	74.9	E	71.7	E	71.5	E	71.2	E
Lake Street/17 th Avenue	2-Way Stop	18.8	C	18.5	C	18.4	C	18.3	C	17.5	C	17.0	C	16.8	C	16.8	C
Lake Street/Funston Avenue	2-Way Stop	27.7	D	27.0	D	26.9	D	26.9	D	34.1	D	33.2	D	33.1	D	32.7	D
New Access/Park Presidio Boulevard		5.8	A	5.2	A	4.9	A	4.8	A	8.4	A	7.2	A	7.0	A	6.8	A

Source: Wilbur Smith Associates 2004e.
 LOS = level of service

Appendix B (in Memo No. 5), and the background level of service calculation sheets are available in the Presidio Trust Library or upon request. “

A.3.8 RLOS” ANALYSIS

RPN claimed that the project’s impact on Residential Level of Service (RLOS) must be considered. The organization asserted that traffic service levels on residential streets are best measured in terms of “quality of life” criteria with the RLOS analysis, which considers activities such as how traffic affects a resident’s ability to walk across a street, ride bicycles, or back out of driveways.

Response – The Draft SEIS appropriately assesses potential impacts on traffic congestion and delay, as well as Presidio gate volumes, transit services, pedestrians, and bicyclists. The residential level of service standards suggested by the commenter are not necessary or appropriate for assessment of the project’s impact on San Francisco streets, and are not a generally accepted standard among transportation and traffic analysis professionals either in the Bay Area or nationwide. The only jurisdiction where the concept of residential level of service standards has been proposed for inclusion in the next revision of the General Plan is for the City of Pleasanton, expected in early 2005, and the standards are currently being applied to projects in the City of Pleasanton that could potentially have effects on residential neighborhoods. The concept is also being considered in the City of Palo Alto. The City of San Francisco, a dense and highly urban environment, differs substantially in character from the City of Pleasanton and the City of Palo Alto, both of which are more traditionally suburban and spread out, and the RLOS concept has not been deemed appropriate by the San Francisco Planning Department for adoption as part of their Guidelines for Environmental Review. At the Presidio and in San Francisco, impacts on bicyclists, pedestrians and “quality of life” are generally discussed qualitatively, and impacts on traffic are quantified using widely applied and accepted methodologies.

A.3.9 “EXISTING PLUS PROJECT” ANALYSIS

RPN suggested that the EA traffic assessment should include an analysis of “existing plus project” conditions for all alternatives. The organization asserted that because the EA does not provide a direct comparison of existing conditions with existing plus project conditions, it is not possible to assess the project share of the increase in future year traffic.

Response – An “existing plus project” scenario is by definition an artificial construct, because it assumes that a project can be constructed overnight and does not make allowances for traffic growth or other changes likely to occur in the time it takes to plan, design, approve, and implement a project – usually several years or more. For this reason, the analysis presented in Section 3 assesses the PHS alternatives at a specific point in time (2020). By comparing Alternatives 1, 2, 3, and 4 to the Requested No Action Alternative in 2020, it is possible to discern the project-specific impacts of each alternative. Also, by comparing the alternatives in 2020 to the existing conditions described within the affected environment section, it is possible to discern the cumulative impacts to which the PHS project would contribute, and

to compare the relative impacts with project contributions under Alternatives 1, 2, 3, and 4, with impacts if the project does not proceed (represented by the Requested No Action Alternative).

Although not required to discern project impacts, an existing plus project analysis is presented below to allow the reader to compare existing conditions to existing plus project conditions. A more detailed discussion of the analysis is available in Appendix B (Memo No. 4), and level of service calculation sheets are available in the Presidio Trust Library or upon request. As shown in Table A-3, all of the study intersections would operate at the same or better level of service as with existing conditions in the AM peak hour except under Alternative 1. Under Alternative 1, the minor approach(es) to the two-way stop-controlled intersections of Lake Street/14th Avenue and California Street/14th Avenue would operate at LOS E rather than LOS D, and the minor approach(es) to the two-way stop-controlled intersection of Lake Street/Funston Avenue would operate at LOS D rather than LOS C.

With the Park Presidio Boulevard Access Variant, AM peak hour levels of service at the study intersections would be the same with Alternative 4 as with existing conditions, the same with Alternatives 2 and 3 as with existing conditions except at one location, and the same with Alternative 1 as with existing conditions except at two intersections. With Alternatives 1, 2, and 3, the two-way stop-controlled intersection of California Street/14th Avenue would operate at LOS D under existing conditions and would operate at LOS E under existing plus project conditions. With Alternative 1, the minor approach(es) to the two-way stop-controlled intersections of Lake Street/14th Avenue would also operate at LOS E rather than LOS D. Because these intersections are two-way stop-controlled, the increase in delay that would cause the decline in level of service would be experienced by drivers on the minor approaches, who would have to wait longer than they currently do for a gap in traffic to proceed onto or across California Street. Drivers could choose to turn right to avoid this delay or the City could choose to implement other measures consistent with Mitigation Measure TR-15.

In the PM peak hour, four of the eight study intersections would operate at the same acceptable levels of service under existing plus project conditions as with existing conditions under Alternative 1, five of the eight study intersections would operate at the same acceptable levels of service under existing plus project conditions as with existing conditions under Alternative 2, six of the eight study intersections would operate at the same acceptable levels of service under existing plus project conditions as with existing conditions under Alternative 3, and all of the study intersections would operate and at the same acceptable levels of service under existing plus project conditions as with existing conditions under Alternative 4 (see Table A-4). The minor approach to the intersection of Lake Street/Funston Avenue that currently operates at LOS C in the PM peak hour would operate at LOS D under Alternatives 1, 2, and 3, and the minor approaches of the two-way stop-controlled intersection of California Street/14th Avenue that currently operate at LOS E in the PM peak hour would operate at LOS F under existing plus project conditions with Alternatives 1, 2, and 3. The minor approaches of the intersection of Lake Street/14th Avenue currently operate at LOS E, and are expected to operate at LOS F with existing plus project conditions under Alternatives 1 and 2. The all-way stop-controlled intersection of Lake Street/15th Avenue would operate at LOS C with Alternative 1 compared to LOS B with existing conditions.

Table A-3. Existing + Project Conditions – AM Peak Hour

INTERSECTION	TRAFFIC CONTROL DEVICE	EXISTING CONDITIONS		ONE-WAY COUPLET								PARK PRESIDIO BOULEVARD ACCESS VARIANT							
				ALT. 1		ALT. 2		ALT. 3		ALT. 4		ALT. 1		ALT. 2		ALT. 3		ALT. 4	
				DELAY ^a	LOS	DELAY ^a	LOS	DELAY ^a	LOS	DELAY ^a	LOS	DELAY ^a	LOS						
Lake Street/15 th Avenue	4-Way Stop	17.4	C	22.2	C	20.4	C	19.5	C	18.8	C	18.1	C	16.8	C	16.6	C	16.5	C
Lake Street/14 th Avenue ^b	2-Way Stop	29.3	D	43.7	E	33.3	D	32.3	D	31.6	D	35.9	E	33	D	32.3	D	31.6	D
Lake Street/Park Presidio Boulevard	Traffic Signal	24.4	C	24.7	C	24.6	C	24.5	C	24.5	C	23.9	C	23.9	C	23.5	C	23.3	C
California Street/15 th Avenue ^b	2-Way Stop	27	D	24.9	C	24	C	24.7	C	25.2	D	31.8	D	29.3	D	29.1	D	28.9	D
California Street/14 th Avenue ^b	2-Way Stop	29.6	D	39.8	E	32.4	D	31.8	D	31.4	D	40.6	E	36.5	E	35.3	E	34.3	D
California Street/Park Presidio Boulevard	Traffic Signal	30.5	C	30.5	C	30.5	C	30.5	C	30.5	C	30.6	C	30.6	C	30.6	C	30.6	C
Lake Street/17 th Avenue	2-Way Stop	15.8	C	16.6	C	16.3	C	16.1	C	16	C	16.2	C	16.1	C	16	C	16	C
Lake Street/Funston Avenue	2-Way Stop	23.5	C	25.8	D	25	C	24.6	C	24.3	C	23.4	C	22.9	C	22.8	C	22.8	C
New Access/Park Presidio Boulevard												4.1	A	4.1	A	3.9	A	3.8	A

Source: Wilbur Smith Associates 2004d.

Notes:

a Delay presented in seconds per vehicle based on the HCM 2000 methodology.

b LOS and delay are shown for the worst minor stop-controlled approach. Major approach is uncontrolled and without delay.

LOS = level of service

Table A-4. Existing + Project Conditions - PM Peak Hour

INTERSECTION	TRAFFIC CONTROL DEVICE	EXISTING CONDITIONS		ONE-WAY COUPLET								PARK PRESIDIO BOULEVARD ACCESS VARIANT							
				ALT. 1		ALT. 2		ALT. 3		ALT. 4		ALT. 1		ALT. 2		ALT. 3		ALT. 4	
				DELAY ^a	LOS	DELAY ^a	LOS	DELAY ^a	LOS	DELAY ^a	LOS	DELAY ^a	LOS						
Lake Street/15 th Avenue	4-Way Stop	12.4	B	15.2	C	13.3	B	13.1	B	12.9	B	13.5	B	12.7	B	12.6	B	12.5	B
Lake Street/14 th Avenue ^b	2-Way Stop	36.1	E	>90	F	52.1	F	46.2	E	42.9	E	53.2	F	42	E	40.4	E	39.1	E
Lake Street/Park Presidio Boulevard	Traffic Signal	21.5	C	21.8	C	21.6	C	21.6	C	21.5	C	27.2	C	24.4	C	24.4	C	24.1	C
California Street/15 th Avenue ^b	2-Way Stop	26.6	D	31.7	D	26.9	D	26.2	D	26.2	D	33.9	D	31.7	D	31	D	30.5	D
California Street/14 th Avenue ^b	2-Way Stop	41.9	E	72.8	F	54	F	50.1	F	47.8	E	83.3	F	57	F	54.2	F	51.4	F
California Street/Park Presidio Boulevard	Traffic Signal	38.9	D	38.9	D	38.9	D	38.9	D	38.9	D	35.2	D	32.7	C	32.4	C	32.2	C
Lake Street/17 th Avenue	2-Way Stop	13.8	B	14.7	B	14.2	B	14.1	B	14	B	14.5	B	14.1	B	14	B	14	B
Lake Street/Funston Avenue	2-Way Stop	23.9	C	27.9	D	25.4	D	25	D	24.7	C	24.0	C	23.5	C	23.4	C	23.3	C
New Access/Park Presidio Boulevard												5.8	A	3.7	A	3.6	A	3.5	A

Source: Wilbur Smith Associates 2004d.

Notes:

^a Delay presented in seconds per vehicle based on the HCM 2000 methodology.

^b LOS and delay are shown for the worst minor stop-controlled approach. Major approach is uncontrolled and without delay.

LOS = level of service

With the Park Presidio Boulevard Access Variant, PM peak hour levels of service at the study intersections would be the same with all alternatives and would be the same or better as under existing conditions at all but two study intersections. At the intersection of California Street/14th Avenue, the minor approach(es) to the two-way stop-controlled intersection would operate at LOS E under existing conditions and at LOS F under existing plus project conditions with all alternatives. Due to the minor change in signal timing assumed with the variant, the signalized intersection of California Street/Park Presidio Boulevard would operate at LOS C under existing plus project conditions with Alternatives 2, 3, and 4 rather than LOS D under existing conditions and would continue to operate at LOS D with Alternative 1. With Alternative 1 only, the minor approach(es) to the two-way stop-controlled intersection of Lake Street/14th Avenue would operate at LOS F rather than LOS E under existing conditions.

In summary, when traffic volumes with the PHSB alternatives (without the Park Presidio Boulevard Access Variant) are added to existing conditions, no new potentially significant impacts (i.e., LOS E or F conditions) would occur during the AM or PM peak hour, except at the two-way stop-controlled intersections of Lake Street/14th Avenue and California Street/14th Avenue under Alternative 1 in the AM peak hour. These same impacts would occur with the Park Presidio Boulevard Access Variant, except that the new potentially significant impact at California Street/14th Avenue would also occur under Alternatives 2 and 3 in the AM peak hour. All impacts at the intersections of Lake Street/14th Avenue and California Street/14th Avenue could be addressed by mitigation measures included in Section 3.

In addition to the existing plus project analysis described above, the Requested No Action Alternative has been added to the analysis of future conditions to allow the reader not only to compare the future traffic conditions under Alternatives 2, 3, and 4 to Alternative 1 and to each other, but also to compare future traffic conditions with Alternatives 1, 2, 3, and 4 to future traffic conditions assuming the PHSB district were to remain at recent level of occupancy (represented by the Requested No Action Alternative).³

A.3.10 TRAFFIC CONGESTION AND SAFETY

Nearly all individual commenters expressed concerns over increased traffic congestion and decreased neighborhood safety. Comments expressed strong concerns about pedestrian, cyclist, elderly, and child safety on neighborhood streets due to increased traffic congestion. Concerns included fear of increased accidents and fatalities, pollution and noise, deterioration of the character of the neighborhood, strain on Mountain Lake Park, and the frustrations of long traffic delays and blocked driveways during rush hours. One commenter expressed concern about the safety of bicyclists sharing the road with automobile traffic on 15th Avenue, citing the observation of a number of accidents that could have potentially been avoided by more width to provide more “shoulder space” for cyclists. The commenter submitted that the PHSB project would exponentially increase the accident rate. RPN asked the Trust to study the safety effects on pedestrians, cyclists, and children of traffic exiting the 15th Avenue gate on such a steep decline. Several

³ The level of occupancy in the Requested No Action Alternative was assumed to include buildings currently occupied by various tenants as well as buildings recently occupied by the Jewish Community Center.

commenters urged that vehicular traffic be limited on Battery Caulfield Road in order to reduce impacts to natural and recreational areas ,and that the roadway be made friendly to pedestrians and bicyclists. One commenter suggested that a Traffic Demand Management Plan be developed to manage the effect of additional traffic on the neighborhood as well as the natural area immediately north of the PHSH district.

Response – The commenter’s assertion that occupancy of the PHSH district buildings will exponentially increase the existing accident rate is unfounded. While reuse of the PHSH district buildings will increase the volume of traffic through the 14th and 15th Avenue Gates, many other factors related to the infrastructure for pedestrians and cyclists determine the overall safety of a street (such as the roadway width available to cyclists or the presence of a buffer between pedestrian and vehicular traffic).

Improvements to the pedestrian and bicycle network through implementation of the approved Presidio Trails and Bikeways Master Plan in the PHSH district will improve safety for pedestrians and bicyclists within the PHSH district and throughout the Presidio. As described in Section 3.2.1.5 of the Draft SEIS, the Presidio Trails and Bikeways Master Plan adds an uphill bicycle lane on Battery Caulfield Road as well as a safe and continuous multi-use path around the south side of the district connecting with the existing path on Park Boulevard leading to the Mountain Lake area and the proposed pedestrian path and uphill bicycle lane along Battery Caulfield Road. While bicycle and pedestrian conditions along Battery Caulfield Road will be improved, cut-through traffic would be discouraged as described in Section 2.5.2.

The roadway network and circulation system within the PHSH district would be designed to discourage vehicular access to and from the north, but Battery Caulfield Road would be retained for secondary access. Traffic calming techniques would be used to slow traffic as it passes through the district. Although these effects would help to minimize traffic volumes and reduce the speed of traffic exiting the 15th Avenue Gate, increases in traffic volumes through both the 14th and 15th Avenue Gates would be noticeable to immediately adjacent residents of the surrounding neighborhood. However, the traffic volumes expected on 14th and 15th Avenues (and the associated noise level and air quality) in 2020 are comparable to those on streets in other residential neighborhoods throughout San Francisco where cyclists must share the roadways with automobiles and where pedestrian activity is common.

A.3.11 OTHER TRAFFIC CONTROL MEASURES

One commenter asked that other traffic control measures be considered and assessed, such as allowing left turns from Park Presidio Boulevard to Geary Boulevard, and lowering the speed limit on Park Presidio Boulevard to 35 miles per hour at the exit ramp from Doyle Drive in order to make the streets safer for the existing nearby neighborhoods. Another commenter asked the Trust to consider developing a through road to allow traffic to reach the PHSH site from Lincoln Boulevard by passing through the Wherry Housing area.

Response – The traffic analysis in the Draft SEIS identifies effects of the PHSH project on the surrounding roadway network and analyzes study intersections that would be most affected by traffic traveling to and from the PHSH district buildings. Where the effects on these intersections would

potentially result in LOS E or F conditions, mitigation measures have been identified. The suggested changes to the speed limit on Highway 1 and suggested revocation of the left-turn prohibition from Park Presidio Boulevard to Geary Boulevard are decisions outside the jurisdiction of the Trust and independent of proposed alternatives for reuse of the buildings in the PHSB district. They are policy decisions for consideration by Caltrans and the City and County of San Francisco. Allowing traffic to turn left from Park Presidio Boulevard onto Geary Boulevard would not necessarily mitigate any LOS E or F conditions at the two-way stop-controlled intersections of Lake Street/14th Avenue, California Street/14th Avenue, or California Street/15th Avenue, and would likely result in a poor level of service and long delays at the intersection of Geary Boulevard/Park Presidio Boulevard for substantially more motorists. The Park Presidio Boulevard Access Variant would not only improve access for the PHSB district and reduce traffic volumes on immediately adjacent neighborhood streets, but also would provide a new intersection of Park Presidio Boulevard that would become the first intersection encountered by southbound traffic on Highway 1 and therefore would likely improve safety conditions at the intersection of Lake Street/Park Presidio Boulevard for pedestrians and bicyclists because traffic would have already slowed down approaching the new intersection.

The suggestion that the Trust develop a through route for traffic through the Wherry Housing area is not consistent with adopted plans for the area, and would have the effect (if 14th and 15th Avenues were also closed) of transferring northbound traffic from the vicinity of 14th/15th Avenue to the vicinity of the Presidio gate at 25th Avenue. The adopted PTMP envisions the conversion of Wherry Housing into open space over time, necessitating the removal of some or all of the roadways in the area. Also, the adopted Presidio Trails and Bikeways Master Plan envisions developing a multi-use trail connecting Battery Caulfield Road to Wherry Housing and Lincoln Boulevard along the alignment suggested by the commenter. This trail alignment traverses a natural area within the U.S. Fish and Wildlife Service (USFWS) Recovery Area for San Francisco lessingia, and its conversion to constant motor vehicle access (as opposed to emergency or more infrequent access) would be inconsistent with the Presidio's plan and potentially conflict with its obligations under the Endangered Species Act.

A.3.12 PREVIOUS TRAFFIC CONDITIONS

The NPS asked the Trust to compare the intensity of past use at the project site against the project alternatives in order to put the proposed changes to traffic and congestion on the neighboring streets into perspective.

Response – The Trust was unable to find any traffic data from the time period suggested by the commenter but obtained some historical data about the number of beds, jobs, and residents that were present when the site was used as a hospital. As a result, Section 3.2.1 has been expanded to include a calculation of the possible number of vehicle trips generated by the hospital based on standard trip generation rates (see Section 3.2.1).

A.3.13 OTHER SOLUTIONS TO TRAFFIC AND PARKING PROBLEMS

Commenters asked that the Trust develop creative and visionary solutions to the traffic and parking problems. They suggested that creative ways to address the issues raised boil down to breaking the 1:1 relationship between people and their cars, and suggested doing so by creating frequently running transit from the PHSH district to the Main Post, limiting parking within the PHSH district, and providing less costly parking at the Main Post. The commenters argued that moving parked cars away from the site moves traffic away from the neighborhood and the Park Presidio corridor near the PHSH site.

Response – The Trust is already taking steps toward implementation of the commenters suggestions. PHSH district tenants’ participation in the Trust’s Transportation Demand Management (TDM) program as outlined in Appendix D of the PTMP would encourage the use of alternative modes of transportation and discourage excessive automobile ownership. Providing parking for the PHSH district elsewhere in the park is not practical for residential uses, and would merely be relocating any parking impact. Not only Presidio tenants, but also the Trust, implement the parking management strategies in the Trust’s TDM program. The Trust’s program includes frequent PresidiGo shuttle (transit) service between the PHSH and the Main Post and limitations on parking supply.

A.3.14 MODE SHARE AND OTHER ASSUMPTIONS

Several commenters criticized various aspects of the EA traffic analysis for having relied upon assumptions about the numbers of residents who would use public transit, the vehicles per resident ratio, and the number of residents working in the Presidio that the commenters claim are flawed.

Response – As explained in Section 3.2, mode share assumptions and traffic assignments were made based on a variety of widely accepted standard data sources relied upon by transportation professionals and derive from the analysis included in the PTMP EIS. No data or analysis have been presented that would invalidate these assumptions.

A.3.15 CLOSURE OF THE 14TH AND 15TH AVENUE GATES

City officials and other commenters displeased with the idea of reuse of the project site for a development of the size being considered under some of the Draft SEIS alternatives suggested that the City might abandon 14th and 15th Avenues as through streets leading into the Presidio.

Response – The Trust does not support cutting off access to the park via closure of the 14th/15th Avenue Gates, which have historically served the PHSH district and recently provided access to the Presidio for almost 2,000 vehicles on a daily basis. Should the City pursue closure of these streets, impacts would include constraining access to the national park, inconveniencing neighbors in the area who would have to drive farther to enter the park, and causing increased traffic volumes at the Arguello and 25th Avenue entrances to the Presidio. Increased volumes resulting from the closure of the 14th/15th Avenue Gates

could degrade the level of service at stop-controlled intersections near these other Presidio gates, necessitating signalization or other mitigation.

The Trust has estimated the increase in traffic through the Arguello Boulevard and 25th Avenue/Lincoln Boulevard Gates expected to result from closing the 14th/15th Avenue Gates and analyzed the associated effect of the increased traffic on intersections at the Arguello Boulevard and 25th Avenue/Lincoln Boulevard Gates in 2020. The PM peak hour traffic volume through the Arguello Boulevard Gate would be expected to increase 15 to 21 percent and the PM peak hour traffic through the 25th Avenue/Lincoln Boulevard Gate would be expected to increase 12 to 17 percent as a result of closing the 14th/15th Avenue Gates. The intersections near the Arguello Boulevard and 25th Avenue Gates would degrade to an unacceptable level of service sooner than if the 14th/15th Avenue Gates were not closed, and the mitigation measures proposed for these intersections in the PTMP EIS would need to be implemented sooner than if the 14th/15th Avenue Gates were not closed.

The PM peak hour traffic volume through the Arguello Boulevard and 25th Avenue Gates in 2020 is expected to be 1,334 and 1,612 vehicles per hour, respectively, as described in the traffic analysis for the PTMP EIS. If the 14th /15th Avenue Gates were closed, the PM peak hour volumes through these gates would increase from these levels, regardless of the alternative selected for the PHS. Closure of the 14th /15th Avenue Gates under the Requested No Action Alternative would result in 17 and 14 percent more traffic through the Arguello Boulevard Gate and 25th Avenue Gate, respectively, compared to the Requested No Action Alternative with the 14th/15th Avenue Gates open.

Closure of the 14th and 15th Avenue Gates in Alternative 1 would result in the PM peak hour traffic through the Arguello Boulevard Gate increasing by 21 percent to 1,615 vehicles per hour and the PM peak hour traffic through the 25th Avenue Gate increasing by 17 percent to 1,893 vehicles per hour. Closure of the 14th /15th Avenue Gates would result in a 15 to 17 percent and 12 to 14 percent increase in PM peak hour traffic volumes at the Arguello Boulevard Gate and 25th Avenue/Lincoln Boulevard Gate, respectively, under Alternatives 2, 3, and 4 (see Table A-5).

Under the Park Presidio Boulevard Access Variant, closure of the 14th /15th Avenue Gates would result in a lesser increase in PM peak hour traffic through the Arguello Boulevard and 25th Avenue/Lincoln Boulevard Gates. The resulting increase in PM peak hour traffic through the Arguello Boulevard Gate would range from 8 percent under Alternative 4 to 11 percent under Alternative 1, and the increase in PM peak hour traffic at the 25th Avenue Gate would range between 7 percent under Alternative 4 to 9 percent under Alternative 1.

Table A-6 provides the PM peak hour levels of service at the intersections nearest the Arguello Boulevard and 25th Avenue/Lincoln Boulevard Gates. Because the PTMP intersection analysis used the 1994 Highway Capacity Manual Methodology, and this Draft SEIS used the 2000 Highway Capacity Methodology,⁴ the levels of service at the nearby intersections with Alternative 1 and the 14th /15th

⁴ See Section 3.2.1.2 for an explanation of the change in intersection analysis methodology.

Table A-5. PM Peak Hour Gate Volumes – Year 2020

GATE	GATES OPEN		GATES CLOSED							
	ALT. 1 (PTMP ALT.)	REQUESTED NO ACTION ALT.	COUPLET				VARIANT			
			ALT. 1	ALT. 2	ALT. 3	ALT. 4	ALT. 1	ALT. 2	ALT. 3	ALT. 4
Arguello Boulevard	1,334	1,504	1,615	1,507	1,481	1,460	1,477	1,413	1,392	1,376
Increase over Volume with Gates Open		17%	21%	17%	16%	15%	11%	9%	9%	8%
14 th /15 th Avenue	624	0	0	0	0	0	0	0	0	0
25 th Avenue	1,612	1,790	1,893	1,785	1,759	1,738	1,752	1,688	1,667	1,652
Increase over Volume with Gates Open		14%	17%	14%	13%	12%	9%	8%	7%	7%

Source: Presidio Trust 2004.

Avenue Gates open are provided with both methodologies. The three intersections of Arguello Boulevard/Jackson Street, Arguello Boulevard/Washington Street, and 25th Avenue/Lincoln Boulevard/El Camino del Mar would require mitigation for the effects of implementation of the PTMP. These mitigation measures include signaling all three intersections as well as removing parking on the northbound approach of the intersection of 25th Avenue/Lincoln Boulevard/El Camino del Mar to add a right-turn lane. These PTMP mitigation measures as described in the PTMP EIS would also mitigate the additional effects of closing the 14th/15th Avenue Gates. However, if the 14th/15th Avenue Gates were closed as part of the PHSB project, implementation of the mitigation measures would be needed sooner than if the 14th/15th Avenue Gates remained open.

Table A-6. PM Peak Hour Levels of Service - Year 2020

	ARGUELLO BOULEVARD/ JACKSON STREET	ARGUELLO BOULEVARD / WASHINGTON STREET	25TH AVENUE / LINCOLN BOULEVARD / EL CAMINO DEL MAR
1994 HCM - Gates Open			
Alt. 1 - Unmitigated	E	E	F
<i>Alt. 1 - Mitigated</i>	<i>A</i>	<i>A</i>	<i>B</i>
HCM 2000 - Gates Open			
Alt. 1 - Unmitigated	F	F	F
<i>Alt. 1 - Mitigated</i>	<i>A</i>	<i>A</i>	<i>B</i>
HCM 2000 – Gates Closed – Mitigated			
Requested No Action Alt.	A	A	C
Couplet			
Alt. 1	A	A	C
Alt. 2	A	A	B
Alt. 3	A	A	B
Alt. 4	A	A	B
Variant			
Alt. 1	A	A	B
Alt. 2	A	A	B
Alt. 3	A	A	B
Alt. 4	A	A	B

Source: Presidio Trust, 2004.

A.3.16 SPILLOVER PARKING

A number of commenters raised concerns that parking in neighborhoods adjacent to the project is already extremely tight, and the potential effects of spillover parking demand have not been adequately assessed. Commenters requested an evaluation of on-street parking conditions in the vicinity of the project site and a description of how each development alternative would affect the availability of neighborhood parking. They pointed out the existing conditions where parking is tight on evenings and weekends resulting in spillover parking within the Presidio, and asked how this condition would be mitigated. Commenters also asked the Trust to assess the impacts on parking caused by recommended traffic mitigation measures such as adding signals and turn pockets.

Response – It is the Trust’s goal to use parking management strategies to minimize the parking throughout the park and encourage the use of alternative modes of transportation. With regard to parking impacts, the Trust does not propose any mitigation measures for existing parking shortfall in the adjacent neighborhood since any existing shortfall is an existing condition that is unrelated to the proposed alternatives. However, as stated in Section 3.2.3.1, the Trust’s private development partner(s) would 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 Trust’s present development partner has also committed to help neighborhood residents expand the “N” residential parking permit zone to other streets in the neighborhood if desired by neighborhood residents. The proposed traffic mitigation measures (e.g., turn restrictions at two-way stop-controlled intersections, adding a right-turn pocket to Park Presidio Boulevard at Lake Street, and reconfiguring the 14th and 15th Avenue Gates as a one-way couplet) would not require eliminating on-street parking spaces. As discussed in the SEIS, the study intersections are within the jurisdiction of the City and County of San Francisco, and implementation of the proposed mitigation measures is at the discretion of the San Francisco Department of Parking and Traffic.

A.4 Historic Resources

A.4.1 IMPACT ON HISTORIC RESOURCES

Various neighborhood organizations and others requested that the Draft SEIS include a better comparison of each alternative’s potential impact on historic resources. Some suggested that Alternative 2 and 4 would have “significantly greater effects on historic preservation” than Alternative 3, and some suggested that there is “a dramatic difference in the impact on historic architectural resources between retaining the building’s wings (Alternatives 1 and 2) and removing them (Alternatives 3 and 4).”

Response – The EA analysis and subsequent Draft SEIS analysis (see Section 3.3) appropriately differentiate between the alternatives where they are substantively different in their treatment of historic resources. The analyses also differentiate between beneficial and adverse impacts of each alternative. Readers should note that removal of the non-historic wings of the main hospital building (in Alternatives

3 and 4) is a beneficial impact of those alternatives, but retaining the wings in Alternatives 1 and 2 is not considered an adverse impact on an historic resource, because the wings already exist as an integral part of the building.

To the extent the comments imply that there would be an adverse visual impact from not removing the hospital's wings, those effects have been addressed under the visual resources impacts analysis. That analysis concludes that retaining the wings would have the visual effect of greater building mass than if the wings were removed. Nevertheless, the improvement of the exterior cladding and the potential reduction in the number of floors would have an overall beneficial visual effect as compared to today's conditions.

The Secretary of the Interior's Standards for the treatment of historic properties do not require the removal of non-historic fabric, and the decision to retain something that already exists cannot be construed as an "impact." Since all of the action alternatives would substantially improve the condition of historic buildings, all would have beneficial effects on historic resources. Alternatives 3 and 4 would have additional beneficial effects because they would remove additional non-historic features.

A.4.2 RETENTION OF BUILDING 1801 WINGS

NAPP commented that retaining the non-historic wings of Building 1801 would be inconsistent with the definition of "rehabilitation" in the Secretary of the Interior's Standards for the Treatment of Cultural Landscapes and the "uninterrupted, sloping lawns" referred to in the draft Planning and Design Guidelines. LSRA added that retaining the wings would "seriously compromise" the historic setting of the sea anchor-shaped building. The NPS commented that retaining the wings and reducing their height and/or re-cladding them would result in a hybrid structure, clouding the historicity of building, and would not conform with guidance contained in NPS-28 and Director's Order #28.

Response – As explained above, nothing in the Secretary of the Interior's Standards requires the removal of non-historic building fabric, and the decision to retain a building or a portion of a building that already exists cannot be construed as an "impact." In the case of Building 1801, the decision to construct the non-historic wings in the 1950s most certainly resulted in impacts to the historic building, including its anchor shape and the surrounding cultural landscape. However, none of the current alternatives can be viewed as the cause of adverse impacts that were imposed by the designers and decision makers of the 1950s, and none of the alternatives would make those impacts any worse.

In fact, Alternatives 2, 3, and 4 would remove some of the non-historic additions to the front of the building, resulting in a beneficial impact on the building and the surrounding landscape. These alternatives would also result in more green space in front of the main hospital than currently exists, whether due to the introduction of underground parking and removal of the central lobby and loggia (Alternative 2) or due to removal of all non-historic additions (Alternatives 3 and 4). As stated above, the alternatives that propose removing the non-historic wings would have greater beneficial impacts than the other alternatives.

The Secretary of the Interior's Standards specifically preclude changes and additions to buildings that create a false sense of history by copying historic features. The Standards do not, however, preclude design changes to improve the appearance of non-historic fabric or changes that are necessary to adaptively reuse an historic building if those changes reflect high quality, contemporary design. Re-cladding the non-historic wings of Building 1801 and potentially reducing their height would be accomplished in conformance with the Secretary of the Interior's Standards, and would introduce materials and design changes that could be clearly identifiable as deriving from the present day. No false sense of history would be created, and the resulting building would clearly remain a "hybrid," in the sense that a portion would date from the 1930s and a portion would date from later. Both sections of the building would be rehabilitated using 21st century materials and techniques in a manner that is entirely consistent with the Secretary of the Interior's Standards and other applicable guidelines. The NPS will have an opportunity to review the design and ensure its conformance with the applicable standards via the historic tax credit process.

A.4.3 CONSULTATION PROCESS

The Fort Point and Presidio Historical Association and California Heritage Council expressed concern for deferring the Programmatic Agreement's consultation process until after issuance of the Draft SEIS. They believed the Trust is acting contrary to the Programmatic Agreement and the National Historic Preservation Act (NHPA) regulations, and further believed the Trust's approach does not allow the views of the public to adequately inform federal decision-making in the 106 process to the extent intended or as early in the planning process as is required by the regulations.

Response – The Trust has acted and continues to act in conformance with a Programmatic Agreement (PA) described in Section 3.3.1.5 (Regulatory Environment) of this Draft SEIS. Also, as explained in Section 4.2.3, the Trust has sought input from the commenters and other parties to the PA since April 2003, and long ago initiated consultation under the NHPA, including agreement with the State Historic Preservation Officer (SHPO) on the Area of Potential Effect in April 2004. This consultation process was originally scheduled for conclusion via a meeting of consulting parties in June 2004. At the request of the National Trust for Historic Preservation, the meeting of consulting parties was deferred until this Draft SEIS and a cultural landscape assessment could be prepared. (On May 28, 2004, the National Trust wrote: "the proposed finding of no adverse effect is ... premature given the recent decision to prepare a [SEIS] for the project.") Both documents will be provided to consulting and concurring parties to the PA as soon as they are available, so that the consultation process can be concluded. Also, no decision on the final project will be made, and no detailed designs will be undertaken, until the consultation process is complete and all interested parties have their legally required opportunity to comment.

A.4.4 PROTECTION OF THE FORMER MARINE HOSPITAL CEMETERY

One commenter asked the Trust to commit to the protection of the former Marine Hospital Cemetery within the PSHH district or state how it will be restored. The commenter also asked the Trust to address all related impacts associated with the proposed actions at the cemetery.

Response – The proposed action and the project site do not encompass the area within the PSHH district that contains the former cemetery. Instead, this area would be improved via related activities described in Section 2.2.4 that would occur whether or not the PSHH project proceeds (see Section 2.2.4 for a summary of remediation activities, and plans to memorialize and interpret the cemetery).

A.5 Utilities and Services

A.5.1 IMPACTS OF UTILITIES CONNECTIONS ON THE ADJACENT NEIGHBORHOOD

NAPP requested additional information on water and electricity use for residential needs for the district, suggesting that estimates developed in the PTMP EIS may have been exceeded. The neighborhood association also asked what impact utility connections would have on the adjacent city neighborhood.

Response – A comparison of annual utility demands of each alternative is provided in Table 23 of the Draft SEIS. The table is based primarily on demand assumptions by land use from the PTMP EIS (see Appendix H [Water] and J [Energy] in Volume III, Appendices) or identified otherwise in a footnote appearing below the table. The analysis of the PSHH project-specific water consumption and electrical demand as reflected in the estimates is entirely consistent with the methodology used in the PTMP EIS, which applies gross building area demand factors to square footage within each district to determine demand, and does not exceed the PTMP water demand estimates. As discussed in Section 3.9.1. of the Draft SEIS, most utilities would connect to lines running along 14th or 15th Avenue. Undergrounding and/or replacing of the lines, which would be the responsibility of PG&E, may temporarily inconvenience nearby residents, with noise and traffic and parking restrictions most likely being of greatest concern. PG&E is installing underground electric lines adjacent to the PSHH district boundaries that would serve the district. Capacity is expected to be more than adequate to serve both the needs of the PSHH project and the surrounding neighborhood. A full discussion of other construction and equipment phasing impacts is provided in Section 3.9 of the Draft SEIS.

A.5.2 IMPACTS OF UTILITIES CONNECTIONS ON PARK RESOURCES AND CITY SUPPLIES

RPN asked whether water supply within the Presidio would be adequate to serve residential tenants, and whether Lobos Creek resources would be protected. The organization also asked whether the City's sewage treatment plant has sufficient capacity to accept flows from the project.

Response – As discussed in Section 3.9.1.1 (Water Supply and Demand) of the Draft SEIS, the Trust purchases and uses water from the City and County of San Francisco (CCSF) as needed to supplement its water supply during the peak season, and to ensure in-stream flows necessary to protect resources in Lobos Creek. The amount purchased typically ranges between 6 and 18 percent of the total water consumed at the park, which represents a small fraction of the Presidio’s estimated water demand of 1 million gallons per day (mgd) in the CCSF Urban Water Management Plan. Nevertheless, the Trust is committed to reducing the demand for off-site water resources by conserving water and by implementing water recycling in northern and eastern sections of the park. A complete discussion of Presidio water supply and distribution is provided in Section 3.6.1 of the PTMP EIS.

Should CCSF water be used to service the PSHH project, a connection would be made from CCSF water lines entering the project site from 14th and 15th Avenues. While these lines have been preliminarily determined to be in fair to good condition, upgrades may be required, which would temporarily inconvenience nearby residents as discussed in Section 3.9.2.2 of the Draft SEIS.

A discussion of the treatment capacity of the CCSF Oceanside Water Pollution Control Plant is provided in Sections 3.9.1.2 of the Draft SEIS. The project would generate up to 55,000 gallons per day (Alternative 1), which represents approximately one percent of the plant’s excess treatment capacity (see Sections 3.9.1.2 and 3.9.2.2).

A.5.3 IMPACTS ON CITY FIRE, EMERGENCY, AND LAW ENFORCEMENT SERVICES

One neighborhood organization suggested that development of the PSHH project would negatively affect the City’s ability to provide adequate city services to accommodate the area in the event of fire, crime, or another emergency.

Response – As indicated in Sections 3.9.1.7 (Fire Protection and Emergency Response) and 3.9.1.8 (Law Enforcement) fire, emergency, and law enforcement services within the PSHH district and Presidio are provided by the Presidio Fire Department and U.S. Park Police (USPP) San Francisco Field Office, and not the CCSF. The CCSF would only provide such services in highly unusual circumstances in which the Presidio Fire Department’s or USPP’s capability to initially respond to an incident would be exceeded. The NPS and the CCSF have signed mutual aid agreements for the purposes of improving fire prevention and law enforcement services within and adjacent to their respective areas. The agreements make it desirable, practicable, and beneficial for the service providers to render assistance to one another. By entering into the agreements, both providers have determined that the provision of fire prevention and law enforcement services across jurisdictional boundaries in certain circumstances would *increase* the ability of the NPS and CCSF to protect the safety and promote the general welfare of the public. As discussed in Section 3.9.1 of the Draft SEIS, the USPP and the Presidio Fire Department have requested assistance from the CCSF only twice in the past ten years (in response to fires in the Pershing neighborhood). Public safety services within the park would be expanded as appropriate prior to PSHH occupancy to ensure adequate service levels and to minimize requests for City assistance. Furthermore, under the mutual aid agreements in place, CCSF would only provide resources on a “standby” basis; services would

not be guaranteed or mandatory, as a requested response would be predicated upon the availability of City personnel or equipment.

A.6 Other Resource Topics

A.6.1 RESIDENTIAL DENSITIES

Commenters suggested that the scale of even the smallest alternatives is inconsistent with the character of the surrounding neighborhood, which is zoned RH-1 and RH-2. One commenter stated that, although the Trust is not legally constrained by San Francisco’s zoning, it is “morally obligated” to decrease or refrain from aggravating “the detrimental impact of its land use” on surrounding neighborhoods.

Response – As explained in Section 3.1.2 (Land Use, Housing, and Schools), the main hospital building at the project site is larger than buildings in the surrounding neighborhoods, and could therefore be characterized as “out of scale” or “out of character” with those neighborhoods. However, the building has stood in its location as is since the 1950s, and none of the Trust’s alternatives would increase the size or scale of the building; therefore none would create a situation that is more “out of scale” or “out of character” than the situation that has existed since the hospital building was originally constructed over 50 years ago. In fact, the alternatives that would introduce residential use to the PHS district (with the possible exception of Alternative 1), would be more consistent with surrounding land use and zoning than at any time in the project site’s history.

Further, even the largest number of residential units proposed for the PHS complex adjacent to the Richmond neighborhood would result in an overall residential density that is similar to the adjacent neighborhood. Specifically, the 337 units proposed on the 18-acre lower plateau in Alternative 2 would result in a density of about 19 units per acre. As shown in Figure A-1, this is similar to the density in an 18-acre section of the adjacent Richmond neighborhood, which would encompass the three full city blocks bounded by California Street, Lake Street, 17th and 14th Avenues, plus the half-size block bounded by 15th and 14th Avenues, Lake Street, and the Presidio. Based on census data, this area contains a total of 318 residential units or an average of 18 units per acre. In general, permitted densities in residential areas of the City zoned RH-1 are in the range of 15 to 17 units per acre, depending on lot sizes. (Informational materials associated with the City Planning Department’s recent update of the City’s Housing Element report an average of 14 units per acre for the RH-1 and RH-1(D) districts combined.)

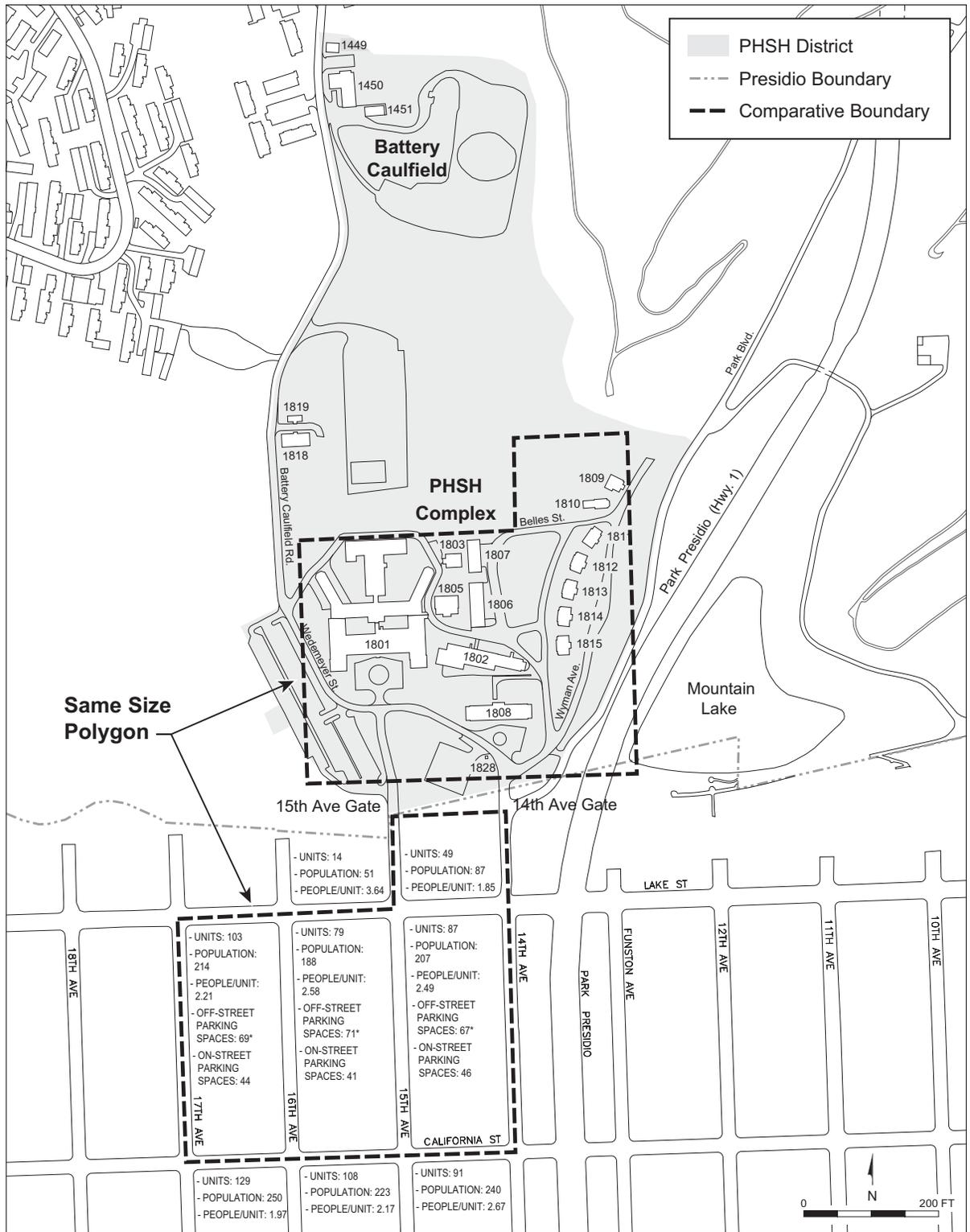


FIGURE A-1. COMPARATIVE POPULATIONS

Source: Presidio Trust and SMWM, June 2004;
Population Data from 2000 US Census;
Parking Data from Field Surveys

A.6.2 ANALYSIS OF VISUAL RESOURCES AND LIGHTING

Commenters requested a more meaningful analysis of visual resources that better differentiates the potential effects of each alternative. Commenters also suggested that the lighting impact of retaining versus removing the non-historic wings should be differentiated, and suggested conformance with the California Outdoor Lighting Standards and the San Francisco Outdoor Lighting Standards. One commenter suggested that the visual effects of Alternative 4 on “the historic open space at Battery Caulfield” was inadequate and that the figure and description provided are misleading because they should more accurately represent the area’s ultimate future condition.

RPN believed a dramatic change to the San Francisco night skyline would result from the different residential development projects being studied. They asked the Trust to evaluate the effects of light pollution, and the impacts of light on Presidio wildlife, existing Presidio tenants, and on residents in surrounding neighborhoods. The organization specifically noted a need to study anew the impacts on wildlife from the PTMP EIS because the residential development alternatives would involve 24-hour usage rather than being limited primarily to daytime use at an educational/cultural facility.

Response – As requested by the commenters, the analysis of visual effects in the Draft SEIS has been drafted to allow comparison among the various alternatives. As explained in Section 3.7, Alternatives 1 through 4 would have beneficial visual impacts, because all would remove chain link fencing and rehabilitate currently boarded-up and noticeably deteriorated buildings. In addition, Alternative 2 would have beneficial effects associated with re-cladding the non-historic wings of the main hospital building, removing its central lobby and loggia, and introducing more green space in the forecourt area. Alternatives 3 and 4 would have the further beneficial effects associated with removal of the non-historic wings.

As stated in Section 3.7.2, Alternatives 1 through 4 would increase interior and exterior lighting at the project site, and would meet PTMP EIS Mitigation Measure NR-7 *Artificial Light*, which would require limiting new light sources, shielding exterior lights, and other best management practices appropriate to a residential community in a park setting. Interior building lighting would be visible from parts of the surrounding neighborhood, particularly from several blocks south on 15th Avenue, but would not exceed amounts that are common and accepted in urban areas and would not noticeably “light up the night sky” as suggested by one commenter.

The State of California has undertaken development and adoption of outdoor lighting standards that are scheduled to take effect in 2005. The City and County of San Francisco may adopt similar standards specific to its jurisdiction. These standards would not address lighting originating from the interior of residential buildings, and would not apply within the Presidio, which is federal property. Nonetheless, the outdoor lighting standards being considered would use an approach that is consistent with the approach in Mitigation Measure NR-7. That is, the standards would require minimization of new outdoor lighting sources and implementation of best management practices appropriate to the proposed land use and its setting.

The state standards would establish a zone system and allow local jurisdictions to adjust those zones. Light levels in LZ1, the lowest zone established for parks and wildlife areas, could be adjusted upward to levels consistent with LZ2 (for rural areas) or LZ3 (for urban areas with “medium” ambient illumination) based on the surrounding land uses. At the project site, the level of outdoor lighting is likely to be well below the maximums allowed in the surrounding neighborhood. In reviewing the PHSB project for compliance with Mitigation Measure NR-7, the Trust will compare proposed lighting to the quantitative standards for parking lot lighting, building grounds, and building entrances in the state’s proposed guidelines.

Visual effects of introducing new housing at Battery Caulfield in Alternative 4 are identified in the Draft SEIS analysis, and the resulting visual characteristics are appropriately compared to those that would occur under the Requested No Action Alternative. Under the Requested No Action Alternative and all alternatives other than Alternative 4, Battery Caulfield would continue to be used as a maintenance yard for an indefinite period of time. Because the ultimate reuse of Battery Caulfield as open space would be contingent on future funding and would require further planning to determine whether that open space would be a recreational area or a natural area, it would be speculative to characterize either its visual characteristics or the time frame in which changes would occur.

A.6.3 EFFECTS ON AIR QUALITY AND NOISE

A number of neighborhood organizations, including PAR, NAPP, and RPN, requested that the Draft SEIS provide a more meaningful analysis that differentiates the effects on air quality and noise between and among the different alternatives. They noted that virtually identical language is used to describe the impacts of Alternatives 2, 3, and 4 as compared to Alternative 1, and requested consideration of the relative increase in noise levels that would result, including construction noise.

Response – Air quality and noise impacts of Alternatives 2, 3, and 4 are similar because the alternatives share many characteristics. For example, each of these alternatives includes residential uses that would generate activity at the PHSB district similar to the activity that currently occurs in surrounding residential neighborhoods of San Francisco. This means that traffic-related air pollutant emissions and noise would be similar in nature for Alternatives 2, 3, and 4, but would only vary in intensity depending on relative intensity of future occupancy. Nonetheless, in response to the commenters’ request, text has been added to highlight the differential noise impacts of each of the alternatives, where they would occur.

With regard to construction noise, under Alternatives 1 through 4, construction would generally occur more than 400 feet from any residences in the adjacent city neighborhood, with minor exceptions as noted in the text. However, during the periods of demolition and concrete crushing operation (if concrete is recycled on-site), and periods of heavy truck activity for material removal or delivery, noise levels for residents near the project site or along roads providing access to the project site could be considerable. Alternative 3, with the greatest amount of demolition and need to transport construction waste off-site, would most likely generate the most noise (followed by Alternative 4, Alternative 2, and Alternative 1). Contractors and other equipment operators will be required to comply with the San Francisco Noise

Ordinance, which requires that noise levels not exceed 80 A-weighted decibels (dBA) at 100 feet. If necessary to manage noise, barriers would be erected around construction sites and stationary equipment such as compressors.

A.6.4 VISITOR EXPERIENCE

Several neighborhood groups requested an analysis that better differentiates the effects on the visitor experience among the different alternatives. They believed that Alternatives 2 and 4 would have significantly greater traffic impacts, which would negatively affect park visitors, and that the residential units at Battery Caulfield in Alternative 4 would have negative effects on visitors and on adjacent sensitive wildlife habitat.

Response – Potential traffic impacts were analyzed within Section 3.2 of the EA and are again assessed in the Draft SEIS. As demonstrated by this analysis, Alternative 1 would permit more daily vehicle trips than Alternatives 2, 3, or 4, with the least number of daily trips generated by Alternative 4. Alternative 4 would introduce more residents to the upper plateau than any other alternative by constructing new housing at Battery Caulfield. This area is not currently available to visitors, although it is visible from adjacent natural areas and trails. See Section 3.8 of the Draft SEIS for further discussion of potential effects on park visitors and Section 3.12 for further discussion of potential effects on natural resources.

A.6.5 VISITOR AND RESIDENT AMENITIES

A couple of commenters offered suggestions about encouraging use of the area by park visitors, including provision of trail access that is not dependent on 14th and 15th Avenues, and a general request for “continued public use.” One suggested that the project should provide a playground and other active recreation amenities to serve project residents in order to “relieve the effects” of those residents on Mountain Lake Park.

Several commenters expressed concern that the scale of the proposed residential projects would affect, and perhaps overwhelm, Mountain Lake Park, which is used by Richmond neighborhood residents. RPN recommended that the Trust evaluate impacts on this park resource, addressing impacts on the Presidio land surrounding Mountain Lake and the City-owned parkland and facilities.

Response – Open spaces within the PSHS district would remain available to the public under all alternatives, and existing trail access between the district and Mountain Lake Park (which is not dependent on 14th and 15th Avenues) will also remain. This trail connection will be improved as Park Boulevard is extended and converted to a multi-use trail, under the Presidio Trails and Bikeways Master Plan. The potential for play structures or a playground within the PSHS district exists, although no decision has been made about the nature or location of such a facility and none is likely until a final alternative is selected.

With regard to impacts on Mountain Lake Park, new residents of the PHS district would disperse throughout the site, the Presidio, and the surrounding city to meet their recreational needs. With a maximum of about 75 school-age residents who could periodically make use of Mountain Lake Park (about half of these under the age of 10), none of the alternatives is expected to degrade or overtax the City park.

A.6.6 IMPACT ON LOBOS CREEK WATERSHED

The Golden Gate Audubon Society asked what impact a residential community would have on the Lobos Creek watershed.

Response – Project impacts on Lobos Creek are described in the Hydrology, Wetlands and Water Quality section of the EA and in Draft SEIS (Section 3.11). Lobos Creek would be potentially threatened if storm drains at the project site are not maintained and therefore cause storm water to flow overland to the creek. Localized erosion has been noted on the west-facing slope of the parking area on the west side of the PHS, and additional erosion and slope failure could discharge hazardous materials and sediment from the underlying landfill (Landfill 10) to Lobos Creek. The Trust plans to resolve slope stability problems as part of its remediation program. Extensive parking lots in the PHS complex provide a potential source of water quality impairment from oil- and hydrocarbon-contaminated runoff if drainage is not prevented from passing to the storm water system. Increased use, increased vehicle activity, and short-term construction activities within the PHS complex would have the potential to degrade the quality of surface water delivered to Lobos Creek unless properly controlled. Indirect impacts that can be associated with intensification of land use include increases in concentration of oils, lubricants, grease, sediment, and other pollutants commonly contained in urban runoff.

To address potentially significant impacts on water resources associated with the project alternatives, the Trust will implement (at a minimum) the best management practices (BMPs) listed in PTMP EIS Mitigation Measure NR-15 *Water Resources BMPs* and will require its private development partner(s) to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). In addition, the Trust will ensure that necessary infrastructure upgrades to the storm water drainage system are performed. All increases in surface water flow will be directed toward the City and County of San Francisco's combined sewer system and not to Lobos Creek (or Mountain Lake).

A.6.7 EFFECTS ON BIOLOGICAL RESOURCES

Several neighborhood organizations requested that the Draft SEIS provide a more meaningful analysis that differentiates the effects on biological resources between and among the different alternatives. They believed that Alternatives 2 and 4 would have significantly greater effects on natural resources than Alternative 3. In addition, they requested that an assessment of indirect impacts on plants and wildlife be added, and suggested that the assessment of indirect impacts on plants, wildlife, and adjacent sensitive habitats is inadequate for Alternatives 2 and 3. These alternatives should be analyzed and compared with respect to the effects of increased traffic, human activity, noise (including construction, traffic and human

noise), and artificial lighting at night on these natural resources and sensitive areas, particularly in the Lobos Creek area west of the hospital. Finally, the NPS noted that the EA demonstrates that increased occupancy brings greater intensity of the known pressures associated with human inhabitation. They asserted that because mitigation efforts can only reduce resource impacts to a limited degree, achieving habitat and wildlife protection is directly proportional to the level of human occupancy.

Response – None of the alternatives would result in direct removal of native plant communities or habitat for special-status plants and wildlife. Indirect impacts on biological resources associated with Alternatives 1 through 4 include, but are not limited to, increased human activity both during the day and after sunset, noise disturbance from human use and construction activities, increased traffic, and an increase in artificial light. Adverse effects on biological resources associated with the alternatives differ in overall extent and intensity of the impact. Factors that influence relative weight of these indirect impacts include variations in maximum building area, amount of day use activity, level of human occupancy, and location of rehabilitation and replacement construction.

Because Alternative 1 would include the maximum building area and residential development combined with heavy day use activity, it would place substantial pressure on biological resources compared to the Requested No Action Alternative. Alternative 1 would also place more disturbance pressure on biological resources compared to Alternative 3, but Alternatives 2 and 4 would have greater disturbance pressure when compared to Alternative 1.

Alternative 2 would reduce day use activity compared to the Requested No Action Alternative and Alternative 1. Nevertheless, Alternative 2 would put more disturbance pressure on biological resources than Alternative 1 due to the overall increase in residential units, including residences in existing buildings on the upper plateau. This alternative would also put more disturbance pressure on biological resources compared to Alternative 3, but Alternative 4 would have greater disturbance pressure when compared to Alternative 2.

Like Alternative 2, Alternative 3 would result in minimal day use activity within the PHSB district. Because of the limited amount of building area and the residential units being restricted to the lower plateau, this alternative would have the least amount of disturbance pressure on biological resources compared to Alternatives 1, 2, and 4.

Alternative 4 would result in a reduction in day use activity; however, the new construction on the upper plateau would result in substantially more indirect impacts on biological resources compared to Alternatives 1 through 3 and the Requested No Action Alternative.

Achieving habitat and wildlife protection would be affected by development within the PHSB district. For the most part, differences among Alternatives 1 through 4 are subtle, and all four alternatives would result in an increase in disturbance pressure associated with human activity (whether it be from day use, residential use, or construction activity). Mitigation measures developed for these alternatives would effectively reduce impacts on biological resources to less than significant levels.

A.6.8 IMPACT OF PETS

PAR and the Golden Gate Audubon Society requested that the impact of pets (dogs and cats) on wildlife habitat be analyzed.

Response – The Draft SEIS notes that special-status plants and sensitive wildlife, including the California quail, occur in or adjacent to native plant communities near the PHS complex and could be vulnerable to indirect impacts associated with off-trail use by project residents’ pets. The Draft SEIS points out that bird species sensitive to pet disturbance could abandon native scrub habitats on both the lower and upper plateaus, especially during the nesting season. As mitigation for this project, the ownership and/or maintenance of pets and/or feral cats on the premises would be prohibited. Existing leash restrictions would be enforced to the extent feasible to limit access of pets owned by residents or visitors in adjacent native plant communities, special-status species habitat, and listed species recovery areas. In addition, additional fences would also be built and maintained to limit pet disturbance and ensure the integrity of quail breeding sites.

A.6.9 NOISE IMPACTS ON WILDLIFE

RPN and the Golden Gate Audubon Society asked how construction noise and noise resulting from “24-hour usage of a residential complex” would affect wildlife in the surrounding area.

Response – An evaluation of noise impacts, including construction noise, on wildlife within the PHS district is provided in Section 3.6, Noise, and Section 3.12, Biology, of the Draft SEIS. The analyses point out that human presence could indirectly affect native and special-status wildlife, in particular nesting birds and California quail, through noise disturbance and traffic. Increased residential occupancy within the upper plateau under Alternatives 2 and 4 (particularly Alternative 4) could intensify the direct and indirect effects on wildlife resources in this area during dusk and nighttime hours. Truck traffic and noise from construction activities would affect sensitive wildlife species for the two to three years that construction would occur. Without seasonal restrictions, bird species sensitive to noise could abandon natural areas, especially during the nesting season. However, wildlife in developed areas would become habituated to the subtle changes in the amount of noise and traffic over time.

In order to minimize or avoid noise and other indirect impacts on sensitive natural settings within and adjacent to the district, construction activities would be confined to previously developed or “disturbed” areas. The south-facing dune slope behind the PHS complex would be managed as a buffer (see Hospital Buffer Zone on Figure 25), which will serve to shield wildlife on the upper plateau from noise within the complex. The Nike Swale and Quail Commons directly north of the district will be monitored for noise during construction. These noise-sensitive areas will also be protected by establishing a construction schedule that limits disturbance during bird nesting activity. With these measures in place, noise levels and impacts on wildlife would be minimized.

A.7 Mitigation Measures

A.7.1 FEASIBILITY OF MITIGATION MEASURES

RPN suggested that mitigation must be identified and described in detail and must be shown to be feasible. Furthermore, they suggested that the environmental effects of the mitigations themselves must be evaluated in more detail. As an example, they asked how a four-way stop or traffic signal would work at 14th Avenue and Lake Street where the distance between Park Presidio Boulevard and Lake Street is so minimal.

Response – Mitigation measures are identified and described in detail throughout Section 3 of this Draft SEIS. Changes between the mitigation measures included in the PTMP EIS and those provided for the PHSB alternatives are also discussed in Section 3, and secondary effects of the measures, if any, have been identified. See Section 3.2.3 for a discussion of the mitigation proposed at Lake Street/14th Avenue.

Installation of all-way stop control was originally suggested as a mitigation measure for the intersection of California Street/14th Avenue, but the PTMP EIS acknowledged that all-way stop control at this location could potentially result in queues extending into the immediately adjacent intersection of California Street/Park Presidio Boulevard, and suggested signalization as another possible mitigation measure. The PTMP EIS also suggested signalization as a mitigation measure for the intersection of Lake Street/14th Avenue. However, 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 the intersection of California Street/14th Avenue, and in more recent correspondence with DPT, the agency also expressed concern about the reasonableness of signalization at the intersection of Lake Street/Park Presidio Boulevard. Restricting traffic on the minor approach(es) to right turns only was considered as an alternative to signalization and would likely improve the operation of all two-way stop-controlled study intersections. As discussed in Section 3.2.3, this intersection is within the City and County of San Francisco’s jurisdiction, and therefore implementation of the measure will be at the discretion of the San Francisco Department of Parking and Traffic. The Trust will continue discussions with DPT concerning mitigation at these intersections.

A.7.2 ADDITIONAL MITIGATION MEASURES

One commenter requested additional mitigation in the form of “mandatory incorporation of adequate and achievable traffic, noise, light, and safety measures” as well as adequate on-site parking for residents and visitors, adequate traffic control for entering and exiting vehicles, adequate policing and security measures, and screening landscape to reduce noise and light experienced by adjacent neighborhoods.

Response – The Draft SEIS identifies all available mitigations necessary to reduce or eliminate the environmental effects that have been identified. The ROD will identify those measures that are to be implemented by the developer as conditions of project approval, those that will be implemented by the Trust, and those that fall outside the Trust’s jurisdiction. The commenter’s assertion that there are

additional environmental effects requiring additional mitigation measures is not supported by the information and analysis presented in the Draft SEIS or by evidence within the comment letter.

A.8 Basis for Project Selection and Public Support

A.8.1 IDENTIFICATION OF PREFERRED ALTERNATIVE

Many commenters suggested that the Trust should provide better rationale or justification for its selection of Alternative 2, and that other alternatives would better meet the Trust's objectives. Some objected to the characterization of Alternative 2 as "moderate." Virtually all the commenters stated their preference for Alternative 3, and many asked why the modest financial gain of Alternative 2 should be given greater weight than all other considerations, suggesting that Alternative 3 would better meet the Trust's objectives. PAR suggested that because both Alternatives 2 and 3 were financially feasible, the Trust should favor the one with the greatest benefits to natural resources, historic resources, traffic, and park use. LSRA suggested that only Alternative 3 would meet all six of the Trust's stated objectives. NAPP stated that keeping the non-historic wings in Alternative 2 would be inconsistent with the Trust's stated objectives of limiting parking and traffic demand. Commenters provided a variety of reasons for supporting Alternative 3 or an option with even fewer residential units.

Response – The reasoning behind identification of Alternative 2 as the preferred alternative provided in Section 2.9 of the EA has been expanded in Draft SEIS Section 2.10. Use of the term "moderate" in the EA refers to fact that Alternative 2 would generate less revenue than some alternatives, but more than others, and would also generate less traffic than some alternatives, but more than others. Also, Alternative 2 is "moderate" in terms of its relationship to the intensity of land use allowable under the PTMP as adopted in 2002. For example, Alternative 2 would generate less traffic than the potential land use mix adopted for the PSHH district in the PTMP.

The Trust has not finally selected or adopted an alternative, and will not do so until the environmental review process is complete and a ROD is prepared. The ROD will outline reasons for selection of one alternative over others, and will discuss each alternative's responsiveness to the project purpose and need described in Section 1 of the Draft SEIS.

The Trust has articulated leasing objectives, along with the desire that these objectives be met in balance with one another. In other words, the Trust desires to select a project that balances all of the leasing objectives or criteria. Since all of the criteria presented are qualitative, it is unlikely that the Trust would determine that an alternative fails to meet one or more given criteria as suggested by the commenters. Instead, the evaluation of each alternative is likely to be a matter of degree – with each alternative addressing each criterion to varying degrees. Thus, while Alternative 3 could be said to better address the criterion about limiting traffic and parking demand than Alternative 2 because it provides the fewest number of parking spaces, Alternative 2 does not fail to meet this criterion because, relative to demand, the parking supply is limited in order to prevent encouraging more trips by car. In fact, Alternative 2

would better address this criterion than Alternative 1, and Alternative 4 would address this criterion best when compared to Alternatives 1 through 3.

By suggesting that the Trust should necessarily select the smallest feasible project, commenters are effectively urging the Trust to treat the leasing objective related to financial matters as less important than the others. This approach might not result in a project that balances all of the leasing criteria as desired by the Trust, and might not result in a project that best addresses the project purpose and need. An expanded evaluation of the alternatives' ability to address the project purpose and need will be contained in the ROD.

A.8.2 FINANCIAL CONTRIBUTION AND CONTEXT

NAPP, PAR, and RPN and several individuals suggested that the Trust is seeking to generate more revenue than necessary from the PHSH project, effectively asking this project to unfairly shoulder the burden of achieving financial self-sufficiency for the Presidio as a whole. They suggested that the Trust should examine other financing mechanisms that might provide more revenue with a smaller project, and that the Trust should look at options for building out other residential spaces elsewhere in the park. They pointed out that the PTMP called for only 210 units at the PHSH district, and that the Trust's stated objective of seeking "full economic benefit from its large residential projects" is not derived from the PTMP or the Trust Act.

Response – The Trust has not determined the final size of the PHSH project or the financing mechanism(s) that would be used. Instead, the Trust has assessed the relative revenue-generating potential of the various alternatives in the EA and Draft SEIS assuming one possible financing mechanism and one possible financial structure (i.e., developer-funded rental housing with \$1 million in guaranteed base rent).

This simplified analysis was provided at the public's request to allow comparison among the alternatives and to assess their overall feasibility. The analysis should not be viewed as reflective of actual financial terms or the absolute revenue associated with any alternative. Other financing mechanisms and financial structures are likely to be considered in negotiations with the selected developer, including the possibility of Trust contributions to the cost of construction, and the possibility of Trust participation in gross revenues in combination with an adjusted base rent. The Trust does not have sufficient capital available to undertake the entire project without additional borrowing and/or developer participation.

Ultimately, the Trust's goal is to generate a stable revenue stream that will back-fill behind the annual appropriations that are declining each year. These appropriations totaled around \$21 million in Fiscal Year 2004 and will decline to zero no later than 2013. The PHSH cannot be expected to generate anywhere near \$21 million annually, but given the relatively few revenue generating opportunities remaining at the Presidio, the amount of revenue needed from the PHSH project cannot be overestimated (see the discussion of the need to generate revenue in Section 1.4.5). Also, most other revenue-generating opportunities of this scale remaining at the Presidio are not residential projects, because of the PTMP's

Presidio-wide cap of 1,654 dwelling units (see Section 3.1, Land Use, Housing, and Schools for a discussion of this cap and the 210 units proposed in the PTMP for the PHSH district). Residential rents have been and are projected to remain more stable than non-residential rents in the San Francisco Bay Area. As a result, non-residential leasing opportunities at the Presidio are not as inherently stable as the expected residential revenues from the PHSH project. This understanding of the larger Bay Area economy creates the reasonable presumption that the Trust should seek substantial economic gains from large residential projects in order to achieve not only the 2013 statutory deadline for financial self-sufficiency, but also to improve the park's prospects for long-term sustainability.

Viewed in this context, the desire to reap economic benefits from the PHSH project should not be viewed as unfairly burdening the project or asking it to shoulder more than its "fair share" of the Presidio's needed revenue growth. Also, the eastern part of the Presidio, with the Letterman Digital Arts campus, will generate far more than the largest PHSH alternative in the future, as will leasing activities in the Main Post area given the number and size of buildings available. In this sense, the PHSH district could be considered to bear a lesser share of the financial burden than other districts of the Presidio. Generally, the Trust's approach is not to seek only what is minimally needed to reach an imprecise and uncertain long-term financial target, but rather to obtain from each building project what the market will bear, while protecting and balancing park values. Anything less may shortchange the long-term sustainability of the Presidio's preservation as parkland over the long term.

A.8.3 FINANCIAL NEEDS AND GOALS

Several commenters asked the Trust to disclose with particularity the Trust's financial needs and goals for the project site. In addition to seeking disclosure of the capital improvement costs, source of capital funding, anticipated revenue, and operation and maintenance costs for each alternative, commenters requested analysis of the incremental financial gain against the incremental environmental impacts of the alternatives in order better to weigh the economic gains against environmental effects. In addition, they requested a full analysis of each alternative's short- and long-term financial implications, as well as a detailed analysis of the cost differences for utilities among the alternatives. One individual asked that the Trust express the project specific financial assessment in the context of Trust five- and ten-year financial projections so that the public can understand why such a project with 350 units is necessary. Similarly, another asked the Trust to analyze some alternative financial scenarios that would look at the effects of varying certain financing assumptions (e.g., where the Trust itself would act as the developer, where the Trust would co-invest with an outside developer, and scenarios that assume more philanthropic support). Commenters submitted that if the Trust cannot find a creative financial solution that would increase the returns on a smaller project so as to avoid maximizing development at the project site, then the Trust should consider retaining Wherry Housing for an additional five to ten years to reduce the financial pressures on the project site.

Response – The Trust will consider suggestions offered by commenters regarding strategies that could be used to increase revenues, and will also provide a full rationale for the final decision to adopt or approve the proposed action, at the time that such a decision is made. The decision on which alternative will be

adopted and the financial strategy that will be used will not occur until the environmental review process is complete. According to NEPA law and practice, the rationale for an agency's decision is presented within a Record of Decision (ROD), which is available to the public. In this Draft SEIS, the Trust has explained its goals within Section 1, Purpose and Need, and has included information regarding the relative cost of the various alternatives and their relative revenue-generating capabilities in Section 2, Alternatives. No additional information or analysis is required to assess the potential environmental impacts of the proposed action.

A.8.4 SIZE OF PROJECT

Virtually all the commenters asked that the size of the project be reduced, and many questioned why the Trust had ignored this request when it was made during scoping for the EA. Some suggested that the Trust needs public support to succeed, and urged the Trust to reverse the ill-will generated by this first large project since the PTMP, and to heed the public's wishes.

Response – The Trust affirmatively responded to requests that the project be reduced in size during the EA scoping process by reducing the size of the two largest residential alternatives. Specifically, the maximum size of Alternative 2 was reduced from 390 dwelling units in the original scoping notice to 350 units in the EA and the Draft SEIS, and the maximum size of Alternative 4 was reduced from 350 dwelling units in the original scoping notice to 269 units in the EA and the Draft SEIS.

A final decision on the PSHH project has not been made, and cannot be made until the environmental review process is complete. Public input is one of several factors that is weighed by the Trust in proposing and pursuing projects, and is also a factor in decision-making. Other factors to be considered by the Trust include the potential environmental impacts and benefits of the various alternatives, and the extent to which each responds to the stated purpose and need for the project.