

## 3.2 LAND USE & POLICY CONSISTENCY

### 3.2.1 AFFECTED ENVIRONMENT

#### *EXISTING LAND USES*

All of the alternative treatment plant sites are located within the Letterman Complex planning district. Although the proposed distribution pipelines extend beyond this area, the pipelines would be underground and would not change or otherwise impact land uses. (The temporary construction effects of all project components are analyzed in the Air Quality, Noise and other relevant sections in this Chapter.)

The planning districts surrounding the Letterman Complex include Crissy Field to the north, which is an important recreational, cultural and natural area with coastal access, an 18-acre restored salt water marsh and dune community, historic airfield and related visitor-serving uses. To the west is the Main Post, which is considered the heart of the Presidio, containing a mix of commercial/office, residential and recreational uses such as the visitor center for the park, the Officer's Club, bowling alley, post office, theater, bank, and various offices. East Housing is located south of the Letterman Complex and is dominated by residential uses with two recreational ballfields. To the east and outside of the Presidio is the Exploratorium and Palace of Fine Arts (a remnant structure from the Panama Pacific International Exposition) and the Marina and Cow Hollow neighborhoods of San Francisco, which include a variety of higher density residential, commercial and various neighborhood-serving uses (restaurants, dry cleaners, shops, theaters, banks, etc.).

The 60-acre Letterman Complex is located along the eastern portion of the Presidio. It serves as a main entrance to the park and is considered one of the most urban districts within the Presidio (Final GMPA, 1994 pg. 72 and Draft PTIP, 2001 pg. 100). The district has had a long history of intensive land uses and development that has left a strong physical imprint on the land. Its close proximity to Doyle Drive/Highway 101 and the City also contribute to its urban setting. There are roughly 50 buildings within the Complex - about 2/3 of which are currently occupied. Existing land uses include office, residential, public safety, recreation and commercial. Historically, the dominant building features were the former Army Hospital and Research Institute. These two buildings were the largest two structures at the Presidio, and are currently being replaced with the Letterman Digital Arts Center (LDAC) – a 23-acre mixed-use campus focused on research, development and production of digital arts and related technologies. Once complete, the campus will include a series of new buildings surrounding a seven-acre public park (Great Lawn) which will replace an existing parking lot. Directly west of the 23-acre campus is the Thoreau Center for Sustainability, which is comprised of roughly 60 different tenants, primarily not-for-profit organizations focused on environmental and social issues that occupy a collection of 12 buildings along Torney, O'Reilly and General Kennedy Avenues. To the north are a variety of recreational facilities including a tennis court, a gym and pool (all affiliated with the YMCA), and a series of warehouses and other industrial-type buildings that historically supported the hospital complex. The majority of these buildings are vacant, with some office and

storage uses. The Swords to Plowshares, a non-profit organization committed to serving the needs of Veterans, occupies two buildings that are used for residential and training purposes. The Trust and National Park Service also use a building for temporary, dormitory-type residential use. The U.S. Park Police maintain a nearby building for storage/office use.

The three alternative treatment plant sites are clustered within an area of warehouse/industrial type buildings, along Thornburg and Birmingham Roads in the northeastern area of the Letterman Complex. The three buildings are mostly unoccupied, with two buildings (1062 and 1063) being used for storage. The two proposed subsurface storage sites are located in the areas immediately surrounding the treatment plant sites and are currently used as a parking lot and open paved area (see Figure 3.2-1).

### ***PLANNED LAND USES***

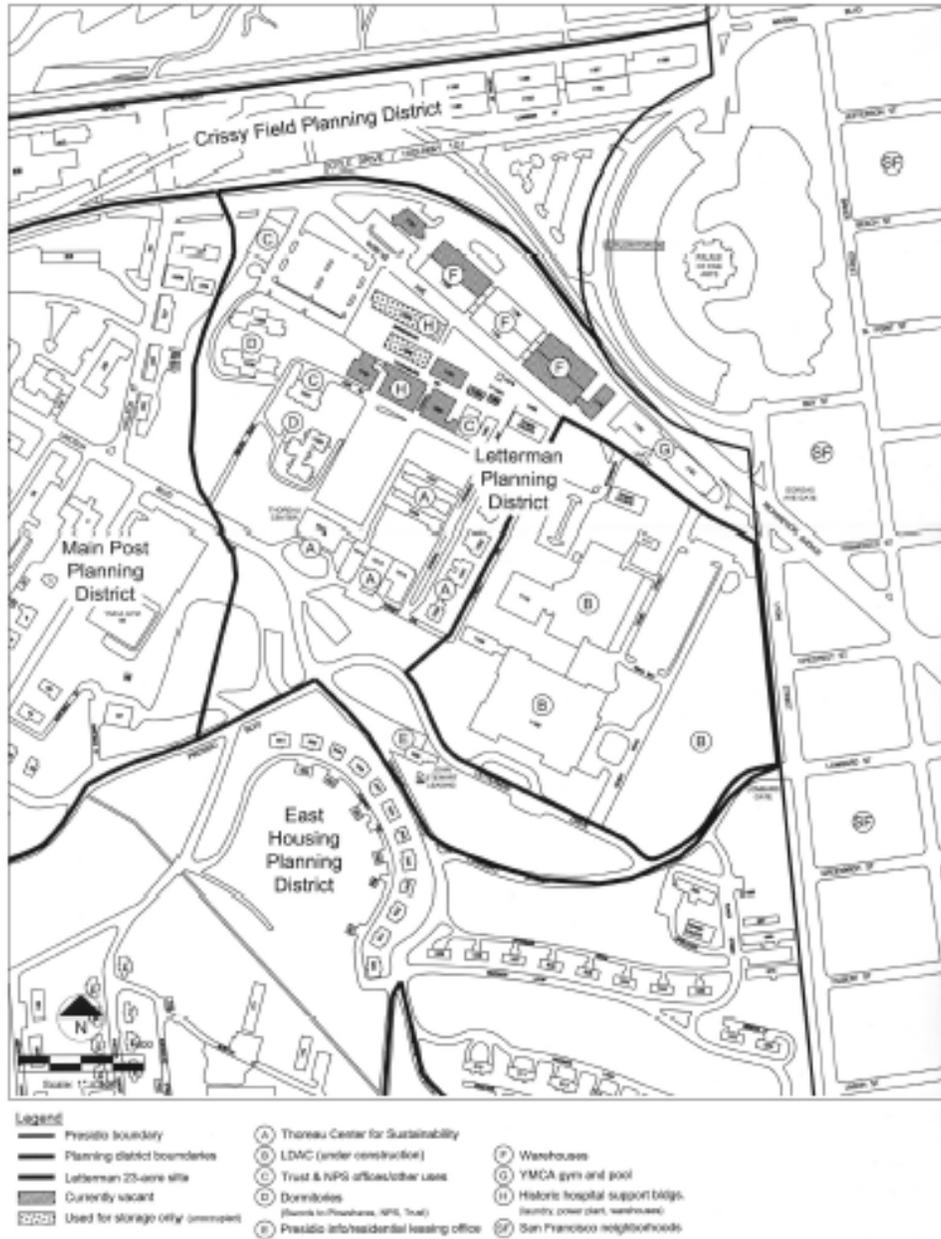
Planned land uses at the Presidio are currently described in two comprehensive land use plans – one adopted and one proposed. The *Presidio General Management Plan Amendment* (GMPA) was approved by the National Park Service in 1994, updated for the Letterman Complex by the Trust in 2000 (via the Letterman Complex Final EIS and Planning and Design Guidelines), and is currently the adopted land use plan for the Presidio. As described in Chapter 1, the Presidio Trust is in the process of updating the GMPA for Area B through the proposed *Presidio Trust Implementation Plan* (PTIP). Once NEPA review is completed and a preferred alternative is adopted by the Trust, the PTIP will serve as the long-term land use plan for Area B. Therefore, a discussion of both the GMPA and Draft PTIP are presented below.

#### **GMPA**

The Final GMPA land use vision for the Letterman Complex is for a scientific research and education complex to be used to “...nurture ideas and support research and actions to improve human and environmental health.” The concept presented in the Final GMPA identifies a variety of land uses within the Letterman Complex that generally maintain the basic pattern of existing development, with some conversion of developed areas (i.e., paved areas and non-historic buildings) to open/green space. All three alternative treatment plant buildings were identified for rehabilitation and reuse for science education and research on the assumption that UCSF would seek to locate a second campus at the Presidio. As described above, the concept for the Letterman Complex was updated in 2000.

#### **Draft PTIP**

The Draft PTIP envisions the Letterman Complex as a “...compact, mixed-use office and residential area with support services, some visitor amenities, and access to transit.” As described above, the LDAC will be one of the principal land uses within Letterman, as will the existing Thoreau Center for Sustainability. Other office and support uses would be located



**Figure 3.2-1**  
 Existing Land Uses

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within rehabilitated buildings or on in-fill sites, with some housing to foster a jobs-housing balance. Consistent with the GMPA and the *Letterman Planning and Design Guidelines* (Trust 2000), the former central courtyard (currently a parking lot) would be re-established, historic patterns of spatial organization would be maintained and reinforced, and a pedestrian-friendly, urban campus-like setting would be created. Restoration of Tennessee Hollow creek and riparian corridor would define the western boundary of the district. Historic patterns of spatial organization and primary view corridors would be maintained and enhanced, including the important Golden Gate views provided along the Thornburg corridor.

### ***RELEVANT POLICIES***

The Final GMPA and Draft PTIP are very similar in their policy statements related to water resource management. Both identify sustainability as a cornerstone in the reuse and conversion of the base into a national park, and identify the use of recycled water as an important step in meeting this goal. These two plans, along with the *Letterman Planning & Design Guidelines* (Presidio Trust 2000) provide the basis for the policy consistency analysis. Information from the *San Francisco General Plan*, while not binding on federal lands, is also presented.

#### **GMPA**

“Objective: Promote and demonstrate conservation practices, including energy conservation, water conservation, and waste reduction and recycling. Use reclaimed water wherever possible.” (GMPA, pg. 52)

The text supporting this objective also acknowledges that “One key to conserving potable water will be the use of reclaimed water from the Presidio and the City of San Francisco for irrigation and other nonpotable water requirements. Because of the large amount of green space at the Presidio...use of recycled water could be significant.” It goes on to state that “Utility systems will be retrofitted where possible to permit reclaimed water use.” (GMPA, pg. 53)

#### **Draft PTIP**

“**Planning Principle 23:** Conservation and Reclamation – Implement and demonstrate conservation practices, including energy conservation, water conservation, stormwater management, and waste reduction and recycling. Use reclaimed water whenever possible.” (Draft PTIP, pg. 55)

The text supporting this principle reiterates the GMPA’s commitment to using recycled water as described above, and identifies steps to ensure that recycled water is available for use at the park. In particular, the Draft PTIP acknowledges this project, and the efforts that have been taken by the NPS and Trust to retrofit existing systems to be compatible with the use of recycled water. The Draft PTIP also indicates that along with the proposed water recycling plant there would be “...educational and interpretive information, to establish the Presidio as a site where visitors can learn about water resources and water recycling within the infrastructure of a sustainable community.” (Draft PTIP, pg. 56)

### **City and County of San Francisco General Plan**

The Presidio is under exclusive federal jurisdiction; therefore it is not directly subject to state and local land use plans, policies, or regulations. However, the Trust seeks to be a good neighbor, minimize possible conflicts between Trust activities and City policies, and consults with the City to achieve consistency wherever possible. The *San Francisco General Plan* (City and County of San Francisco, n.d.) contains general land use policies and objectives for San Francisco. Lacking any jurisdiction, the City has not developed any site-specific plans for the Presidio property; however, relevant water management policies were reviewed. Objective 6, Policy 2 encourages and promotes research on the necessity and feasibility of water reclamation.

More recently, the City has taken several actions to reinforce and strongly encourage the use of recycled water. In 1991, the City passed *Ordinances 390-91* and *391-91* which outlined the components to be included in a *Recycled Water Master Plan* (RWMP) for the City. In July 1996, the City prepared the RWMP, which described a three-phased program to provide up to 10.3 MGD of recycled water for non-potable use within the City. Although the EIR for the RWMP was certified, the City has not adopted the RWMP (it is currently being revised by the City). The City's endorsement of the use of recycled water is reflected its an active participation in the Bay Area Regional Water Recycling Program and in the *Final Urban Water Management Plan for the City and County of San Francisco Public Utilities Commission* (February 2001) and in adoption of Article 22 (Section 1204) of the San Francisco Public Works Code, which requires installation of dual piping in newly constructed buildings within certain areas of the City thought to offer the greatest potential for the use of reclaimed water.

### **3.2.2 ENVIRONMENTAL CONSEQUENCES**

#### ***ALTERNATIVE 1 (CENTRALIZED STORAGE)***

##### **Effects on Existing and Planned Land Uses**

Under Alternative 1, one of the three building alternative sites would be rehabilitated and reused as a water recycling plant. As described in Section 3.9, Noise, operational noise associated with the plant would be attenuated and would not be perceptible at nearby residential and office uses. Further from the plant, operational noise would continue to attenuate and would be negligible, falling within the existing ambient noise environment. Because the proposed plant would not involve solids handling and would process relatively weak wastewater, the potential for odor effects would be minimal (as compared to a conventional wastewater treatment plant). The proposed water recycling plant would be designed with dual odor control facilities that would effectively contain odors within the treatment building, and would not pose a nuisance to adjacent or nearby uses. Refer to Section 3.8, Air Quality and Odors, for an analysis of odor impacts.

Two possible subsurface storage sites are being considered as part of Alternative 1. Both sites are located within close proximity to the three alternative treatment plant sites, and both have been designated for future environmental remediation. Under Alternative 1, the storage facility would

be constructed immediately following remediation activities. Following construction, the storage facility would be completely contained underground, and its surface would be designed to accommodate other uses.

Implementation of Alternative 1 would be considered consistent with the planned land uses set forth in both the GMPA and the Draft PTIP. Under the GMPA, buildings within the Letterman Complex are to be rehabilitated and reused for scientific research and education purposes, with a focus on actions to improve human and environmental health. The adaptive reuse of any of the three alternative building sites for a water recycling facility would be consistent with the overall land use vision for this area. This Alternative would demonstrate the beneficial reuse of water, one of California's most scarce resources, promote improved water conservation and a reduced dependency on local and regional water resources, and would be consistent with the GMPA vision for this area. Under the Draft PTIP, the Letterman Complex would become a compact, mixed office and residential use area that would include support services while maintaining historic patterns of spatial organization. The proposed water recycling system would function as a support service for the Letterman Complex, as well as other areas within the park. Reuse of existing buildings and the provision of subsurface storage would help ensure that the historic patterns of spatial organization and important view corridors are maintained. The minimization of noise and odors from the facility would reduce the potential for nuisances, and no conflicts among planned land uses would occur.

*Alternative 1 would not create a substantial land use conflict or compromise the nature or character of the Presidio or its surroundings, and no mitigation is recommended or required.*

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### **Consistency with Relevant Policies**

As previously described, use of recycled water and other water conservation actions are common themes of the management policies established in both the GMPA and Draft PTIP. As a national park with a substantial built environment (i.e., historic buildings), many urban-type demands for services are needed. These needs have been recognized by the NPS and Trust, and are reflected in specific policies related to the use of recycled water as well as the overarching goals describing sustainability, reducing the reliance on outside resources, maximizing conservation and efficiency, and becoming more self-sustaining. Implementation of an on-site water recycling system is an important step towards achieving this broad vision. By implementing Alternative 1, the Trust would not only reduce potable water consumption for irrigation or other non-potable uses, but it would also reduce the amount of wastewater conveyed off-site for treatment. Alternative 1 is consistent with the policies set forth in both the GMPA and Draft PTIP.

*Alternative 1 is consistent with, and would carry out in part, the sustainability and water management direction set forth in the GMPA and the Draft PTIP. No mitigation is necessary.*

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## ***ALTERNATIVE 2 (MULTIPLE STORAGE SITES)***

### **Effects on Existing and Planned Land Uses**

Similar to Alternative 1, Alternative 2 would include the construction and operation of a water recycling plant at one of the three alternative sites. Underground storage would also be provided, albeit a somewhat smaller facility, at one of the two alternative storage sites within the Letterman Complex. (Refer to above analysis for a detailed discussion of potential land use conflicts related to these project components.) During Phase 2, supplemental storage would be provided through the rehabilitation and retrofit of an existing abandoned reservoir in the western portion of the park, within the South Hills planning district. The reservoir is located in a forested area surrounded by a chain-link fence, with residential uses occurring roughly 1,000 and 500 feet to the north and south, respectively. A recreational trail is located along the edge of the reservoir. Storage would be for treated water only, and no odor or other potential nuisances or conflicts with surrounding land uses would occur as a result of the proposed reuse of the existing reservoir.

*Alternative 2 would not create a substantial land use conflict or compromise the nature or character of the Presidio or its surroundings, and no mitigation is recommended or required.*

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### **Consistency with Relevant Policies**

Alternative 2 would similarly achieve the basic project objectives, and in so doing would be considered consistent with relevant GMPA and Draft PTIP policies, as described above for Alternative 1.

*Alternative 2 is consistent with, and would carry out in part, the sustainability and water management direction set forth in the GMPA and the Draft PTIP. No mitigation is necessary.*

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## ***NO ACTION ALTERNATIVE***

### **Effects on Existing or Planned Land Uses**

The No Action Alternative would not impact existing or planned land uses, and no substantial conflict would be created.

**Consistency with Relevant Policies**

Under the No Action Alternative, no steps would be taken to implement the policies set forth in both the GMPA and Draft PTIP. The GMPA and corresponding EIS specifically identified the use of up to 1.0 MGD of recycled water for landscape irrigation at the Presidio. The Draft PTIP similarly identifies use of recycled water as an important action toward achieving sustainability at the park, and emphasizes the use recycled water whenever possible. Under the No Action Alternative, recycled water would not be available for use at the Presidio. Although the Trust would continue to implement domestic and irrigation water conservation measures, potable water would continue to be used for irrigation and other non-potable uses. This Alternative would be inconsistent with the fundamental water management policy statements from the GMPA and Draft PTIP.

*Selection of the No Action Alternative would be inconsistent with relevant policies established in the GMPA and Draft PTIP. No feasible mitigation is available to remedy the inconsistency, other than implementation of one of the action alternatives.*