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14 April 2004

John Pelka  
The Presidio Trust  
34 Graham St., P.O. Box 29052  
San Francisco CA 94129

Re: Environmental Assessment (EA) for the Public Health Service Hospital (PHSH) project

Dear Mr. Pelka,

The Planning Association for the Richmond (PAR) submits the following scoping comments on the Public Health Service Hospital Project Environmental Assessment, February 2004.

PAR, founded in 1970, is the largest neighborhood association in San Francisco, with a membership of approximately 1,600 dues-paying households. Our area in the Richmond District extends along the southern and western boundary of the Presidio from Arguello Boulevard to the ocean and is directly adjacent to the Public Health Service Hospital project area. We have participated actively in Presidio planning for many years.

Summary of PAR comments:

PAR recognizes that some limited modifications have been made in Alternatives 2 and 4 in the Environmental Assessment. We also commend the efforts to pursue a Park Presidio Boulevard access route and the attention given in the EA to the detrimental effects of development at Battery Caulfield (Alternative 4) on ecologically sensitive areas.

We nevertheless believe that the EA is insufficient to support a finding of no significant impact for Alternatives 1, 2 and 4. We also think that a project of this magnitude may warrant a full Environmental Impact Statement because of the potentially significant impacts on traffic, natural resources and park use.

The use of Alternative 1 (up to 400,000 square feet of educational/residential development) from PTMP as the baseline “no action” alternative is, in our view, inappropriate. It is not a “no action” alternative because it entails the maximum amount of development in buildings that have been vacant or little used for two decades. When the site was used to full capacity many years ago, the buildings were operated for different uses and under different conditions. Moreover, when this option was described in PTMP, it was described in only a very general way with details (such as the mix of educational and residential uses) to be left to further planning with public input.

We are concerned about the precedent set when proposed future actions from PTMP are used as no action alternatives. We appreciated the change made in the Tennessee Hollow Watershed Project scoping when the PTMP alternative was replaced with a true “no action” alternative for baseline comparisons.

The EA is deficient because it fails to describe adequately the differences among Alternatives 2, 3 and 4. The EA generally compares each of Alternatives 2, 3 and 4 with Alternative 1 but not with

one another. In some sections of the EA (e.g., the sections on historic resources, visitor use and visual resources), the discussions of environmental consequences use virtually identical wording to describe impacts of Alternatives 2, 3 and 4 in comparison with Alternative 1. Yet the maximum development of 400,000 square feet in Alternatives 2 and 4 will clearly have a greater impact than the 275,000 square feet of development in Alternative 3. The use of Alternative 1 as the baseline obscures the differences among the other alternatives and does not provide a meaningful or informative discussion.

The EA is additionally lacking because there are gaps in the analysis of certain topics, including traffic, visual resources, utilities and services and visitor use. These gaps are discussed in Section 3 of this letter below.

Finally, it is our understanding that a project of this size may require a full Environmental Impact Statement. The 9th U.S. Circuit Court of Appeals recently noted in the case of *Ocean Advocates v. U.S. Army Corps of Engineers* (case no. 01-36133, March 15, 2004) that an EIS must be prepared if there are substantial questions as to whether a project may have a significant impact. Significance is determined by context or setting and by intensity, which includes cumulative impact and proximity to an ecologically sensitive area. A finding of no significant impact must be based on a "hard look" and not on conclusory assertions.

In the context of the adjacent urban neighborhood and ecologically sensitive areas, it appears that Alternative 2, the proposed preferred alternative (up to 400,000 square feet, 350 units and 910 residents) would have intense impacts on traffic and natural resources and that Alternative 4 (up to 400,000 square feet including building at Battery Caulfield) would have intense impacts on natural resources.

Notwithstanding our objections to the EA and our view that an EIS may be needed, our preference among the alternatives presented is Alternative 3 (up to 275,000 square feet, 230 units and 600 residents) or a moderate variation thereof. This option would better protect ecological areas, bring traffic impacts to a more acceptable level and preserve historic resources.

The remainder of this letter presents our comments in three parts: 1) evaluation of preferred alternative; 2) comparison of alternatives in the EA; and 3) specific topics in the EA.

## II. Full comments on Specific Environmental Topics.

### **Evaluation of Preferred Alternative**

PAR urges the selection of Alternative 3 as the preferred option rather than Alternative 2 as currently proposed in the EA because Alternative 3 better meets the stated projected objectives. Alternative 3 meets five of the six objectives (p. 15 of the EA) better than Alternative 2: preserving historic resources; revitalizing the site; limiting traffic and parking demand; promoting design quality; and protecting natural resources. For the sixth objective, financial contribution, the EA states that Alternative 3 is financially feasible.

PAR recognizes the Presidio Trust's need to become financially sustainable and to generate revenue to preserve the park. We understand that the National Academy of Public Administration's recent report on the Presidio Trust (January 2004) discussed the need to strengthen the financial viability of the Presidio. Yet this same report also called for a better balance between financial goals and broader national park site goals. We believe the benefits to natural resources, historic resources, traffic impacts and park use weigh strongly in favor of Alternative 3, given that it has been deemed financially feasible.

We also suggest that the Trust explore alternative financing mechanisms as recommended in the NAPA report as a way of decreasing costs and increasing returns. PAR suggests that alternative mechanisms, such as the Trust acting as its own developer or obtaining federal loans, could bring more revenue from a smaller project.

Alternatives recommended in the NAPA report include a joint financing partnership with a private developer and/or using the Trust's already appropriated loan guarantees to provide lower-cost federal financing. The report states the NAPA panel believes that a greater use of federal financing to rehabilitate Presidio buildings "...could substantially reduce their financing costs."

A contract development option, in which the developer would work as the Trust's agent, was also suggested as a possible financial alternative in the proposal of a finalist in the developer selection process, John Stewart Company. The proposal suggested this arrangement could provide an opportunity "to significantly increase net revenue to the Trust."

PAR urges the Trust to reconsider its preferred alternative as it appears to us that Alternative 3 is, in fact, a better option for the Presidio than Alternative 2.

## **2. Comparison of Alternatives in the Environmental Assessment.**

The EA does not adequately address the relative impacts of preferred Alternative 2 in comparison with Alternative 3 and 4. In several sections of the assessment, Alternatives 2, 3 and 4 are each compared primarily with Alternative 1 (the "no-action" alternative), often with similar wording, but not with one another. These sections include the discussions of traffic, historic resources, air quality, visual resources, visitor use and biology. There is relatively little differentiation between the impacts of the maximum density developments presented in Alternative 2 and 4 and the significantly smaller development in Alternative 3.

This approach appears to fall short of standards requiring a "hard look" at a proposed action (in this case, Alternative 2) before a finding of no significant impact can be made. As discussed below, we believe there are in fact substantial differences among Alternatives 2, 3 and 4 in impacts on traffic, historic resources, air quality, visual resources, visitor use and ecology.

As mentioned above, the differences among Alternatives 2, 3 and 4 are obscured by the use of the PTMP option of up to 400,000 square feet of a hybrid residential-educational project as the baseline Alternative 1 or the "no action" alternative. Because this alternative entails the maximum development, comparing impacts of Alternatives 2, 3 and 4 with Alternative 1 tends to veil the differences among the other options.

## **3. Specific Topics in the Environmental Assessment.**

### **a. Traffic**

There appear to be several gaps in the EA's evaluation of traffic impacts. First, the cumulative effects of traffic produced by the various project alternatives together with traffic generated by San Francisco's soon-to-be adopted Housing Element plan are not considered. The long-term interaction of these two plans must be carefully looked at before either is found to have no impact.

Second, the EA's discussions of travel demand, traffic at local intersections and traffic operations compare Alternatives 2, 3 and 4 with Alternative 1 but not with each other. The tables appear to suggest some substantial differences among 2, 3 and 4, however. For example, there is a 25 percent difference in the number of weekly trips generated by the Alternatives 2 and 3.

Third, as mentioned above, we question the meaningfulness of labeling Alternative 1 as the baseline "no-action" alternative for purposes of analyzing traffic impacts, since this combined residential-educational alternative per se entails a greater amount of motor vehicle activity than a purely residential project. Thus, the EA's finding that all other alternatives produce lesser traffic impacts than Alternative 1 tends to obscure the differences among the other alternatives.

Fourth, while the tables show "extremely high delays" at peak hours at certain intersections (e.g., Lake Street and 14th Avenue and California Street and 14th Avenue) for both Alternatives 2 and 3, the assessment does not look at the impacts on other nearby intersections, such as the intersections of Lake Street and 10th, 11th, 12th, Funston, 16th, 17th and 18th Avenues. These intersections are already affected by increasingly heavy traffic during peak hours and the traffic is likely to increase more rapidly in the future because of the augmented emphasis on housing density in San Francisco. The EA is insufficient to support a finding of no significant impact without an analysis of these additional intersections.

Finally, while PAR supports the Park Presidio variant, the implementation of this variant is, at this point, very uncertain. We urge that the variant not be the basis for a possible finding of no significant impact for any alternative unless the implementation of this variant becomes more realistically certain. Short of such a certainty, the Trust could consider placing a tiered usage limitation on the PSHH project that would link the maximum occupancy of the site to specific traffic mitigation measures.

## **b. Historic Resources**

The beneficial impact on historic resources of Alternative 3, which would remove the nonhistoric hospital wings, is greatly understated in this section. The demolition of the wings and restoration of the 1932 facade is the most significant single action that could be taken to enhance historic resources in this district. It constitutes a major difference between Alternatives 2 and 3 in furthering the stated project goal of protecting historic resources.

It is difficult to understand how the EA can state in identical language (pp. 93 and 95) that in all of Alternatives 2, 3, and 4, "Building rehabilitation and reuse... would have a beneficial effect on historic architectural resources, similar to Alternative 1." There is dramatic difference from the point of view of historic architectural resources between retaining the nonhistoric wings (Alternatives 1 and 2) and removing them (Alternatives 3 and 4).

## **c. Air Quality**

The discussion of environmental consequences does not address the differential impacts of Alternatives 2 and 3 on motor vehicle emissions and air pollution from operational sources in the project. The smaller project in Alternative 2 would presumably have significantly less impact.

## **d. Visual Resources**

We have three concerns about the EA's assessment of impacts on visual resources.

First, the descriptions of the impacts of Alternative 2 and 3 downplay the negative effects of retaining rather than removing nonhistoric hospital wings. The removal of the wings would have a substantial positive visual impact by reducing the bulk of the building and eliminating what is widely considered by the public to be an intrusive eyesore. Even if the exterior surface of the wings is replaced with a more pleasing material, the structure will still be out of proportion for its surroundings of open space and a lower-density residential neighborhood.

Second, the discussion of Alternative 4 does not address the jarring visual effect that would be created by placing a residential development at Battery Caulfield, which has historically been perceived by the public as open space. We disagree with the EA's characterization (p. 116) of the Battery Caulfield area as "unsightly," a description that seems to be belied by the photograph in Figure 15. The description of the "unsightly mix" of heavy equipment, stock-piled materials and broken pavement is misleading in view of the temporary nature of the storage and the current lack of vertical development in the area. Obviously, the stored materials and debris can and should be removed from this sensitive habitat area.

Third, the descriptions of the effects of artificial lighting do not take note of the greater environmental impact of additional lighting in Alternatives 1, 2 and 4 in comparison with Alternative 3. The EA uses identical language for all four alternatives, stating (pp. 120, 122 and 127) that "New activity on the site would mean an increase in lighting, both within building and within adjacent parking areas and landscape zones." Retaining the brightly illuminated nonhistoric hospital wings in Alternative 2 would have a significantly greater impact on park resources than Alternative 3. In addition, there is no reference to California's Outdoor Lighting Standards, or the Outdoor Lighting Regulation which San Francisco is in the process of assessing. Both should be referenced for conformity.

## **e. Visitor Use.**

The assessment of Alternative 4 in this section does not address the effect on visitors of construction of multiple residential units at Battery Caulfield in an area that is otherwise perceived as open space and is surrounded by sensitive wildlife habitat.

The evaluations of impacts of Alternatives 2 and 3 contain virtually identical wording. They do not consider the beneficial effect on park visitors of the smaller, less dense and more historically harmonious project in Alternative 3.

## **Utilities and Services**

A discussion of how and where electrical lines would be brought in to serve the various project alternatives should be included in this section. We note that this same issue has caused great concern among neighbors of

the Letterman Digital Arts Center.

**h. Biology.**

The EA's description of existing biological habitats and resources outlines a number of environmentally sensitive areas in the PSH planning district, including the quail habitat north of Battery Caulfield, the wetlands and riparian areas in the Nike Swale, native plant communities in the Nike Swale and the Lobos Creek area and special status wildlife occurring in the area.

The assessment correctly identifies the detrimental effects on these resources of development at Battery Caulfield in Alternative 4. It also refers to the "greater intensity of indirect impacts" on plants and wildlife in Alternative 2 in comparison to Alternative 1, but does not compare Alternatives 2 and 3. We would like to see a more specific and extensive comparison of the impacts of Alternatives 2 and 3 in terms of the effects of increased traffic, human activity, noise (including traffic, construction and human activity noise) and artificial lighting at night on these sensitive areas. We believe there are substantial differences in the effects of these two alternatives on natural resources.

Thank you for considering our comments.

the assessment should look at recreational amenities that might be offered as a good-neighbor gesture to local neighbors and other members of the public, such as picnic tables to the south of the hospital.

**12. Visitor experience.** The evaluation of visitor experience should consider changes in open space; recreational amenities; and the visual aesthetics of building renovations and construction. Visitors should experience the Public Health Service Hospital District as part of a national park. The national park experience would be enhanced by an improvement in the connection between Lobos Creek and the Mountain Lake area.

**13. Public safety.** A moderate development at the Public Health Service Hospital complex would improve public safety and put an end to vandalism. The assessment must consider the effect of traffic associated with maximum development on the safety of pedestrians and bicyclists within the Presidio and in adjacent city neighborhoods.

**14. Cumulative impacts.** The cumulative impacts of construction at Battery Caulfield on natural resources, open space, visual aesthetics, air quality and noise are so significant that they should trigger additional environmental review requirements, which could delay the project and the income potential for the Presidio Trust.

Thank you for consideration of our comments. We look forward to a continuing relationship with the Presidio Trust.

Sincerely,

Ron Miguel  
President, Planning Association for the Richmond

cc: Presidio Trust Board  
Craig Middleton  
Hillary Gitelman  
Paul Osmundson  
Brian O'Neill  
NAPP  
Gavin Newsom  
San Francisco Board of Supervisors  
Larry Badiner  
Paul Maltzer