

congestion by enhancing operations and improving travel times in high congestion travel corridors will lead to an overall reduction in GHG emissions. “

Caltrans recognizes the concern that carbon dioxide emissions raise for climate change. However, modeling and gauging the impacts associated with an increase in GHG emissions levels, including carbon dioxide, at the project level is not currently possible. No federal, state or regional regulatory agency has provided methodology or criteria for GHG emission and climate change impact analysis. Therefore, Caltrans is unable to provide a scientific or regulatory based conclusion regarding whether the project’s contribution to climate change is cumulatively considerable

4.5 Environmentally Superior Alternative

CEQA Guidelines (Section 15126.6(e)(2)) require that an environmentally superior alternative be identified among the alternatives considered. The environmentally superior alternative is generally defined as the alternative which would result in the least adverse environmental impacts to the project site and surrounding area. If the No-Project (No-Build) Alternative is found to be the environmentally superior alternative, the document must identify an environmentally superior alternative among the other alternatives.

The No-Build Alternative would best avoid impacts as compared to the proposed build alternatives; and hence, it is the environmentally superior alternative. Although the No-Build Alternative would not result in any physical impacts to the environment, it would fail to meet the purpose and need of the project. The No-Build Alternative would fail to provide the long-term seismic, structural and traffic benefits associated with replacing Doyle Drive and would therefore not be considered an environmentally superior alternative in the long-term.

Each build alternative meets the purpose of the project and the overall impacts associated with each are similar. The main differences in impacts between the Replace and Widen Alternative, Presidio Parkway Alternative, and Preferred Alternative can be found in the areas of visual resources, vehicular access to the Presidio, roadway runoff and pollutant loading, wetlands, geology and soils, land use, and historic features.

Visually the Presidio Parkway Alternative and Preferred Alternative will provide improved views from within the Presidio, while the Replace and Widen Alternative would continue to obstruct views that are currently blocked by the existing roadway. The Replace and Widen Alternative, No-Detour Option would raise the low-viaduct approximately two meters (six feet) which would increase the view blockage and visual dominance of the structure.

Vehicular access to the Presidio differs for the Replace and Widen Alternative, Presidio Parkway Alternative, and Preferred Alternative. Access for the Replace and Widen Alternative is available from Doyle Drive via the on- and off-ramps

to Merchant Road at the Golden Gate Bridge Toll Plaza and via a right turn from southbound Richardson Avenue to Gorgas Avenue. Under the Replace and Widen Alternative, the existing slip ramp providing access to the Presidio from northbound Richardson Avenue would be removed. Therefore, there would be no Presidio access for northbound traffic at the east end of Doyle Drive due to geometric constraints and concerns for traffic safety.

The Presidio Parkway Alternative offers better access to the Presidio, including two options for direct access to the Presidio and Marina Boulevard at the eastern end of the project (Diamond Option or Circle Drive Option). In addition, the alternative includes an option for providing access to the Presidio via a direct connection from northbound Doyle Drive to Lincoln Avenue which would avoid the Toll Plaza.

Additionally, the Presidio Parkway Alternative would reconfigure Palace Drive so that it directly intersects with Richardson Avenue and operates as a one-way street in the northbound direction. Palace Drive would no longer connect to Lyon Street; rather Lyon Street would become one-way from Richardson Avenue and connect to Bay Street. This redesign would be inconsistent with the proposed entry dropoff/turnarounds at the north and south ends of Palace Drive that are being examined by the city and county of San Francisco Recreation and Parks Department as part of the Palace of Fine Arts rehabilitation efforts.

Similar to the Presidio Parkway Alternative, the Preferred Alternative will provide direct access to the Presidio and indirect access to Marina Boulevard in both directions via access ramps from Doyle Drive connecting to an extension of Girard Road. Palace Drive will not be affected by the Preferred Alternative. It will be maintained as a two-way road and incorporate the modifications proposed by the San Francisco Department of Recreation and Parks for the north and south connections with Lyon Street.

The Presidio Parkway and Preferred Alternatives will result in the reduction of total runoff volume and would also likely result in a reduction of pollutant loading associated with the roadway (relative to the No-Build and Replace and Widen Alternatives since approximately twenty-five percent of the roadway under the Parkway Alternative would be in tunnel segments and therefore not subject to storm water runoff.³)

All build alternatives will result in impacts to both jurisdictional and Cowardian wetlands. The total amount of permanent impacts will be slightly greater under the Presidio Parkway and Preferred Alternatives [0.21 hectares (0.52 acres)] compared to the Replace and Widen Alternative [0.20 hectares (0.50 acres)]. In addition, the construction of the tunnel section of the Presidio Parkway and

³This assumes that any residual water collected within the tunnel during storms or during washdown activities is contained.

Preferred Alternatives could disrupt groundwater flow in the bluff region which will potentially result in indirect impacts to wetland vegetation growth in the area.

None of the build alternatives will affect state or federal threatened or endangered animal species although each alternative would cause the loss of minor amounts of wildlife habitat. The Presidio Parkway Alternative and Preferred Alternative will permanently remove or damage 5.07 hectares (12.54 acres) of non-native vegetation including non-native forest and ornamental wildlife habitat. The Replace and Widen, With Detour Option would impact 2.37 hectares (5.86 acres) of non-native vegetation.

The Presidio Parkway and Preferred Alternatives will impact geological materials which are a designated resource. Construction of the tunnel segments will require the removal of these designated geologic materials. The Replace and Widen Alternative would not impact these designated resources.

All build alternatives will conflict with specific development plans of various PTMP planning areas. The Replace and Widen Alternative would require the removal of approximately 380 square meters (4,000 square feet) of building space in the Letterman planning area with the No-Detour Option. The Replace and Widen Alternative, With Detour Option would require the permanent removal of approximately 13,200 square meters (142,100 square feet) of building space from the Crissy Field planning area. The Presidio Parkway Alternative would require the maximum removal of almost 10,600 square meters (114,100 square feet) of building space with the Circle Drive and Merchant Road Slip Ramp Options. The building removal would be required in the Crissy Field, Letterman, Main Post and Fort Scott planning areas. The Preferred Alternative will require the permanent removal of approximately 8,590 square meters (92,490 square feet) of building space from the Crissy Field, Main Post and Letterman planning areas. The land use development plans identified in the PTMP call for an increase in building space in each of the identified planning areas; therefore, the removal of building space from these areas will be in conflict the proposed land use goals of the PTMP.

The additional land area required for implementation of each build alternative would also differ. This is the total amount of land that will be required in addition to the existing roadway easement. The Presidio Parkway Alternative would require the greatest amount of land which would vary depending on the design options. The Diamond Option with the Loop Ramp would require a total of 4.6 hectares (11.4 acres), while the Hook Ramp would require 4.1 hectares (10.1 acres). The Circle Drive Option with the Loop Ramp would require a total of 4.5 hectares (11.1 acres), while the Hook Ramp would require 3.9 hectares (9.6 acres). The Merchant Ramp would require an additional 0.5 hectares (1.2 acres) of land. The majority of land to be converted to a transportation use is in areas currently designated as open space/natural. The Preferred Alternative will require 2.6 hectares (6.4 acres) of land for permanent roadway easements. The Replace and Widen Alternative would require the conversion of an additional 0.9 hectares (2.2 acres) of land along the Doyle Drive corridor for the No-Detour

Option and 0.6 hectares (1.5 acres) of land for the With Detour Option for permanent roadways easements.

The total number of historic elements affected would vary between the different design options of the build alternatives. The greatest number of impacts will be associated with the Preferred Alternative which would adversely affect 17 historic elements. The Presidio Parkway Alternative would affect up to 15 elements depending on the design option while the Replace and Widen Alternative, With Detour Option would adversely affect nine elements. As a result of the impacts to the contributing elements, each build alternative will cause a direct adverse effect to the Presidio National Historic Landmark District.

Based on a quantitative analysis of impacts presented in this document it can be determined the Replace and Widen Alternative, No-Detour Option would have the fewest environmental impacts and would therefore be considered the environmentally superior alternative.

Determination of the environmentally superior alternative does not preclude the other alternatives from being selected. The lead agency may adopt a statement of overriding considerations which expresses the agency's views on the merits of approving a project despite its significant adverse environmental impacts. The statement of overriding considerations provides the justification for proceeding with a project despite its environmental impacts. The statement reflects the balancing of competing public objectives including factors such as environmental concerns, legal issues, technical, social, and economic factors. Since the San Francisco County Transportation Authority selected an alternative other than the environmentally superior option, a statement of overriding considerations will be provided as part of the certification of this FEIR.

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