



June 1, 2009

Presidio Trust Board of Directors
Mr. David Grubb, Chairman
Craig Middleton, Executive Director
John Pelka, Compliance Manager
Presidio Trust
P.O. Box 28052
San Francisco, CA 94129

Re: Comments on Presidio Trust's Management Plan, Revised Draft Main Post Update (February 2009) and Supplement to Draft Supplemental Environmental Impact Statement (February 2009)

Dear Directors and Messrs. Grubb, Middleton and Pelka:

The Cow Hollow Association (CHA) represents the interests of over 1,800 residents in the neighborhood directly adjacent to and most affected by increased development in the Presidio's eastern area. This letter constitutes CHA's comments on the Presidio Trust's Management Plan, Revised Draft Main Post Update (February, 2009) and Supplement to Draft Supplemental Environmental Impact Statement (February, 2009).

CHA has played a very active role in both the NEPA and NHPA processes for the Main Post over the past two years. We have participated in all the public Trust board meetings, public workshops, and informational meetings related to the Main Post NEPA documents. We have worked closely with many other neighborhood, civic and preservation groups in analyzing the preferred alternative and composing our responses. The information brought forward through the various public processes has served to reinforce our position: the CHA opposes the proposed placement of the Fisher Contemporary Art Museum on the Presidio Main Post as currently provided for in the Preferred Alternative. To that end, CHA's Board of Directors has adopted the following resolution:

The Cow Hollow Association (CHA) is opposed to the Fisher Contemporary Art museum being located on the Presidio Main Post. The proposed enormous size, incongruous style and outside art displays are profoundly inconsistent with the historical character of that Park site. The increased traffic both inside and outside the Park, insufficient parking

and consequent noise and pollution would be detrimental to the natural environment of this National Park.

The CHA recognizes the civic-mindedness of the Fisher family, and hopes that this art collection will be placed in the City of San Francisco. The CHA represents over 1,800 households in the area adjacent to the Presidio and is directly affected by this proposed very significant expansion of Presidio activities. We submit this both as neighbors to the Presidio and as citizens of the City of San Francisco.

Opposition to the currently proposed Preferred Alternative plans is widespread. Detailed arguments and emotional appeals against the plans have been submitted through thousands of comment letters from the public and from numerous respected neighborhood associations, civic groups and historic preservation organizations.

One such group, the Presidio Neighborhood Representative Work Group (PNRWG), of which CHA is one of the sixteen member organizations, has submitted a comprehensive report dated June 1, 2009. The CHA fully endorses the arguments and suggestions put forth by PNRWG.

The CHA is also in agreement with comment letters being submitted by Presidio Historical Association, Marina Community Association, Save The Presidio, Neighborhood Associations for Presidio Planning, Earth Justice, National Trust for Historic Preservation, National Park Service's 213 Report and its NEPA comments.

A fatal weakness in the Preferred Alternative is the consequent traffic and parking problems in the Presidio and surrounding neighborhoods due to the significant increase in visitation created by the new tourist attractions given the lack of adequate public transportation serving the area. The inevitable problems with traffic, parking, congestion, noise and pollution within and outside the Presidio will fundamentally damage the character of the Presidio as a National Park.

Muni issued its analysis of these plans and concluded that the City would need to come up with a conservative estimate of \$7.2 million the first year to implement and \$3.5 million a year thereafter to provide adequate public transit service to meet the projected increase in demand from the Presidio. It is difficult to imagine Muni funding this substantial new service need when the City is cutting back existing Muni services due to severe budget constraints. It is inconsistent with good urban planning practices to locate major public attractions in the middle of open space that is poorly served by public transportation. As recommended by the San Francisco Board of Supervisors, neighborhood, civic and historic organization and hundreds of citizens, the museum should be located in the City of San Francisco near public transportation and other cultural institutions.

With the Presidio over four miles from Bart, CalTrans and the ferries and Muni cutting services, the primary transportation to the Presidio is now and will continue to be by automobile: cars, tour buses and taxis. The significant projected increase in automobiles combined with the decision by the Trust to charge for parking throughout the Presidio, the surrounding neighborhoods will bear the burden of visitors opting for free parking on residential streets. The planning documents make no meaningful effort to address this impact.

In addition, the Trust has admitted that the huge projected increase in visitors will contribute to traffic gridlock at the already limited gate entrances. One of their proposed solutions includes placing traffic lights at these impacted intersections. For the Trust to promote plans that are not necessary to the fiscal sustainability of the Presidio and to knowingly foster development activity within the Presidio that will bring intersections at three major Presidio gates entrances (Lombard, Presidio Ave, and Arguello), at streets leading to those entrances and at a number intersections within the Presidio to failing levels of service is completely irresponsible and inconsistent with the Presidio Trust Management Plans.

We favor responsible, appropriate development and building reuse in the Presidio, but feel strongly that excessive commercialism, bringing millions of new tourists a year, will overwhelm the existing roadways, parking, fire and police services inside the National Park. These infrastructure shortcomings within the Presidio appears certain to burden the City of San Francisco's transportation, fire, and police resources during a time when budgets are being slashed due to state and local fiscal challenges.

While the museum proposed by the Fisher family would indeed be an invaluable cultural asset to the city of San Francisco and the nation, its placement on the Main Post of the Presidio is simply inappropriate. The CHA has the following questions for the Trust:

- ***How will the Trust find ways to avoid, not mitigate, the adverse effects on the surrounding neighborhoods?*** This museum, which will house one of the most valuable and important private modern art collections in the world, will attract hundreds of thousands of visitors. Cars, buses, and taxi cabs approaching the Presidio from the East have limited access points to enter the Presidio. We believe the result will be dramatically increased levels of noise, congestion and traffic throughout Cow Hollow. The SDSEIS fails to address avoidance of any concrete plans for the most substantial mitigation.
- ***How will the Trust implement an effective, measurable and enforceable TDMP for the proposed changes to the Presidio's parking and traffic infrastructure?*** The Presidio Trust has failed to adequately consider the adjacent neighborhoods in the EIS for past Presidio development projects, including the Lucas development next to the Lombard Street Gate. These projects have produced a significant increase in traffic and parking

congestion in the Cow Hollow neighborhood that was not accounted for in the planning documents. The feeble mitigation measures that are contained within the current Transportation Demand Management Plan offer no viable enforcement mechanisms and have failed to alleviate the negative impacts, including parking in the adjacent neighborhoods. The fee-based parking in the Lucas garage for tenants, visitors, and patrons has actually increased the parking demands on the adjacent City streets. In addition, the limited effectiveness of the San Francisco's Department of Parking and Traffic enforcement practices (another consequence of the City's fiscal pressures) needs to be addressed in the overall transportation analysis.

- ***How can the Trust actually mitigate the degraded level of service at designated intersections when the recommended traffic lights require coordination between neighborhoods and the City of San Francisco, which are outside their jurisdiction?*** Due to the open-ended nature of development projects that the Presidio may pursue, these problems for the neighborhood will only increase and must be addressed in the EIS.
- ***Will the Trust reconsider underground parking?*** There are no current plans for underground parking for the museum at the Main Post site. The CHA Board strongly believes the underground parking option must be revisited and tied directly to the proposed museum, with the Trust retaining direct control over the management of any underground parking facility, no matter where the museum is located in the Presidio. This would also apply to the hotel proposal. However, underground parking in a natural park, within a National Historic Landmark District, would be an unacceptable adverse effect on historic resources. The SDSEIS fails to prescribe an effective, allowable parking solution for vehicular traffic being drawn to the Main Post by the Trust's development plans.
- ***We ask that you revisit the results from three workshops held last year, which included input from the public and preservation agencies as to the appropriate need and purpose for the Main Post and suggested ways to achieve them.*** Starting there would result in alternatives that are in the best interests of the Park, the public and future generations and do not waste the time and resources of those individuals and organizations that submit bids for these projects.

The Trust's new Preferred Alternative does nothing to answer the Cow Hollow Association's other major concern that the museum is at odds with the integrity of the Presidio's unique historic setting and will seriously damage the heart of this National Park. The revised plans, like the original Alternative 2, are unlikely to meet the Secretary of Interior's standards to protect the Main Post's Historic Landmark District status. We bring this up now to illustrate that draft documents in both the NEPA and NHPA process are seriously flawed and together represent the

serious miscalculation by the Trust that these projects were suitable for the Main Post district. In fact, they should never have been approved in the first place. The CHA is a consulting party to the Section 106 process and will continue to submit comments on NHPA issues as part of that process.

The Board of Directors of the CHA believes that the current proposal to place the Fisher Art Museum on the Presidio Parade Grounds and the plans for a large hotel will have a significant negative impact on the Presidio and our neighborhood. We urge that the plans be placed on hold and the process started again with meaningful, genuine public involvement and in a manner consistent with the historic character and the fundamental purposes and needs of the Presidio's Main Post and the park as a whole.

Sincerely,
/s/
Lori Brooke

President, Cow Hollow Association

cc: Michela Alioto-Pier, District 2 Supervisor
Cow Hollow Association Membership
Speaker Nancy Pelosi
Senator Dianne Feinstein
Senator Barbara Boxer
Mayor Gavin Newsom
San Francisco Board of Supervisors
Frank Dean, Superintendent, GGNRA
Jon Jarvis, Regional Director, National Park Service
John Fowler and Katharine Kerr, Advisory Council on Historic Preservation
Wayne Donaldson, California Office of Historic Preservation