

To: John Pelka, Presidio Trust Compliance Officer
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D Wayne Donaldson, California State Historic Preservation Office

From: Donald Green, Laurel Heights Improvement Assn. Consulting Party to the
Presidio Trust Section 106 Programmatic Agreement

May 25, 2009

Subject: Response to Draft Finding of Effects, Presidio Trust Main Post Update,
February, 2009.

This response is based on both the DFOE and the Section 213 Report, NPS, Apr 6,
2009.

1. The Historic/Non Historic building space ratios for the Main Post Need to be reviewed
and presented in detail. in the Final FOE and FSEIS.

The NPS concludes the cumulative effects of the proposed undertaking severely
diminishes the historic character of the Main Post and the overall integrity of the NHLD.
(p. iii)

One of the ways the NPS summarized the cumulative effects was to present the
reduction in percentage of square footage (area) of historic buildings over total building
area in the Main Post before and after the MPU. The report (p. iv) states the reduction
is from 88% to 75%..

At the meeting of the Consulting Parties, Apr. 21, 2009, the author of the 213 Report,
Dr. E. Jackson-Retondo, announced the initial percentage of historic to total building
area was not 88% shown in the Apr 6, 2009 Report, (p. iii) , but instead was 81%..

No data was provided in the 213 report or from the author at the meeting of Apr. 21,
2009, when she announced the revised lower estimate.

I have reviewed the data provided by the NPS/Trust on each of the buildings in the Main
Post area. My conclusion is that 93.5% of the Main Post non residential buildings as
currently presented is Historic buildings.

I request the NPS to provide a table of the square footage of each of the historic and
non historic buildings in the main post by building number, and show the total areas
underlying the revised NPS estimate and any new estimate which they might care to
present.

2. The Historic/Non Historic Building Ratios in the PTMP and MPU Preferred Alternative , for the immediate area surrounding the Main Parade Ground, must be detailed and presented in the FDOE/SEIS.

The 213 report suggested further, on p iv, that the effect of the decrease in historic/total building area is exacerbated by the *distribution* of square footage. Specifically, the new and existing non historic building area is concentrated in a few buildings primarily located around the Main Parade Ground.

I have examined the data collected for the PTIP in 2001 from the NPS/Trust, which has not changed .to date, as far as I am aware. Looking at the buildings “primarily located around the Main Post”, as suggested by the NPS, he results are as follows:

	<u>Current</u>	<u>MPU/FOE</u>
	(in thousands of square feet)	
<u>Historic</u>	332	332
Total	354	607 (including new construction)
Ratio	94%	55%
 <u>Non Historic</u>	 22	 275 (including new construction)
Total	354	607 (including new construction)
Ratio	6%	45%

The area located around the main parade used in the preceding analysis includes
 Montgomery Street on the West
 Graham St. on the East
 North of Lincoln, between Montgomery and Graham, on the North
 North of Moraga between Montgomery and Graham, on the South.

Assuming the data I have used is current, and the arithmetic is correct, the ratios of historic to total building space in the immediate area surrounding the Main Parade in the current vs the preferred alternative tells a dramatic story. (The current is the same as the PTMP allows). The historic percentage drops from 94% to 55%; the non historic percentage rises from 6% to 45%..

Quantitative assessments such as these may be useful in determining the effects of the preferred alternative on the area, in terms of character defining features that distinguish the historic fabric setting, feeling, and association from other areas. As concluded by the NPS 213 report, the reduction in historic to total building area around the Main Parade threatens the historic character and integrity of the Main Post.

I request the Trust, in consultation with the NPS, present their own data by historic and non historic buildings and include the data and analysis in the Final FOE.

3.. The amount of new construction, beyond that already approved, should not exceed 20,000 sq. ft. in order to maintain the historic ratio and feel of historic building area to total area in the Main Post District.

The NPS 213 report recommends (p. vii) reducing the proposed square footage of new construction and proposed demolition of historic resources to maintain the existing ratio of historic building area to non historic area.

Translating this into square feet in each category, we have the following:

60,000 sq. ft allowed demolition of Main Post non historic buildings 211,385,6,7
60,000 sq. ft allowed new construction to maintain the existing ratio.

What we have already:

17,000 sq. ft of new construction already built at building 104, Disney
3,600 sq. ft new construction, building 100, Intl. Center against Violence
3,000 sq. ft new construction approved for the Chapel
23,600 sq. ft total built or approved
13,400 sq. ft reserved by the Trust for other infill at the Main Post
38,000 sq. ft approved/reserved infill for Main Post

60,000 sq. ft allowed new construction to maintain existing ratio
22,000 sq. ft allowed new construction at Main Post to maintain current ratio

Even if the Trust and consulting parties agree to relax somewhat the NPS recommended maintenance of the existing ratio of historic/non historic building area, it would be a far cry to jump to 100,000 total additional new construction, beyond that already approved, built or held in reserve.

100,000 sq. ft of new construction,
38,000 already approved new construction
9,000 existing non historic (bldg. 211, old Burger King)
147,000 existing non historic and new construction.

The ratio of historic to total sq. ft in the immediate area surrounding the Main Parade Ground will fall from 94% (see para. 2. above.) to 66% (332/504).

The non historic portion increases from 6% to 34%, almost six times the existing ratio. Allowing total new construction, above that approved, for 100,000 sq. ft total for one or more new projects would drastically alter the feeling and association of the Main Parade Ground area.

The only way to maintain the existing feel and association of buildings at the Main Parade is to limit new construction, above that already approved and reserved, to close to 20,000 sq. ft. This should be the conclusion of the new FOE, and passed on to the

project proponents for the Museum (100,000 sq. ft), the Lodge (85,000 sq. ft) and the theater (18,000 sq. ft).

4. The Trust owes it to the Consulting Parties, the project proponents and the public to review comments due June 1 and promptly issue a revised MPU and or DOE consistent with conclusions reached on allowable new construction.

The Trust will have to decide what limit they wish to impose, and how to allocate that limit among the project proponents. Then the proponents can inform the Trust of their decision to proceed with drastically more limited space or to forego the project at that site.

It would be a disservice to the Section 106 consulting parties to continue to review the MPU at its current configuration when it is very clear that the total new construction proposed of 240,000 sq. ft. is way beyond the amount that would leave the Main Post as an area that would meet the Secretary of Interior's Standards. The Trust owes it to the consulting parties, to the project proponents and to the public at large to promptly review the comments due June 1, 2009, and advise all of their conclusion on how to proceed.

5. The FOE does not discuss traffic and parking in and around the main parade ground that will be substantial and will be an adverse effect on the feeling, association and setting of the area. This deficiency should be corrected.

The DSEIS shows the following: proposed number of parking spaces:

- 135 street parking on the Main Parade Ground streets
- 225 street parking elsewhere on the Main Post
- 1230 parking spaces in 19 lots in the Main Post
- 565 underground parking in three Main Post locations
- 2155 total parking spaces

The 2155 parking spaces is equal to the number estimated in the PTMP for the Main Post, out of 9170 for the entire Area B under the Final Plan alternative.

The demand for parking spaces in the MPU/SDSEIS is the same with the added 900,000 visitors related to the new construction projects as it was under the PTMP, presumably with far fewer visitors. The FOE should review the estimates of visitation and parking prepared in the SDSEIS, in the light of comments made by Donald Green, Laurel Heights Improvement Association, and determine whether the SDSEIS levels of visitation, traffic and parking. and the adjusted levels will have a significant adverse impact on the feeling, setting and association and at the Main Post. The FOE should not ignore this important aspect of the preferred alternative.

6. Cumulative Effects does not discuss the likely impacts of traffic, parking and visitation at other districts within Area A and how they would affect the Main Post District. A Park wide plan for transportation, traffic and parking must be completed and submitted before or with the final MPU, DOE and Final SEIS.

The DSEIS does not provide data on the volume of projected traffic, visitation and parking demand in Area A, managed by the National Park Service. It is clear from the figures in the DOE that estimates for development in Area A, contiguous to Area B, and specifically to a good portion of the Main Post District, will effect Area B. To ignore the traffic and parking issues there, and those that will arise from Doyle Drive on Area B, and their spillover impact on Area B, is to ignore a major issue that will have an adverse impact on the Historic Landmark District.

By completing a parkwide transportation plan, in cooperation with the National Park Service, the Trust will be in a much better position to evaluate the impacts of the proposed new construction on the Main Post. Without that plan, the DOE leaves out essential information needed to assess impacts.

Respectfully submitted,

Donald S. Green
Laurel Heights Improvement Association