

TO: John Pelka, Main post@presidiotrust.gov
From: Donald Green, Laurel Heights Improvement Association
June 1, 2009
Subject: Comments on the Revised PTMP Main Post Update (proposed amendment to the PTMP), related Supplement to the DSEIS and Section 106 Draft Finding of Effects, Feb. 2009

These comments address the DSEIS, focusing on visitation and parking. We also note the predominant role the NPS has in protecting designated national historic places, and the specific value of adhering to NPS policies in the Presidio.

VISITATION

There was a 700,000 reduction in annual visitation estimates between July 2008 DSEIS and February 2009 SDSEIS, a reduction of 22%. The Trust addressed these changes in abbreviated form in FAQs on the Trust website. Most reductions appear arbitrary, subjective and without foundation.

Retail/Restaurant

The Trust has reduced its combined estimate for restaurant and retail visitation by 40%.

533,000 July SEIS, Proposed Alt 2
330,000 Feb., 2009 SDSEIS, Preferred Alternative
203,000 Reduction

Both estimates enumerate the same buildings and uses; the February 09 footnote adds that restaurant estimate was adjusted based on information received from current Presidio restaurants, no further information was provided explaining the extent of this adjustment.

The 40% reduction in estimates is accounted for by the difference in the assumption of the percent of restaurant and retail customers who will be on independent visits, from 25% to 20%. The difference in this assumption alone creates a 200,000 reduction in visitation, or twenty percent of the increased visitation associated with construction of new projects in the MPU. There is no support for either the July 09 assumption of 25% unlinked visits, or the Feb. 08 assumption of 20% unlinked visits. The SEIS should explain the basis for both assumptions.

The Trust provided additional information in FAQs : part of the reduction reflects an adjustment in the daily person trip estimates per to include non peak days. This explanation is difficult to understand and no data or calculations were provided to support or measure the reduction.

Without more support, there is no reason to accept these changed assumptions or the results derived therefrom. We assume the larger visitation.

Other Cultural Uses: Montgomery St. Barracks

First Floor Space (15,000 approx. sf.) is reserved in buildings 101, 102, 105 (and 104 if CAMP is not approved) for cultural/educational uses. Visitation is based on 40 average daily person trips per 1000 sf to determine daily trip generation; this is translated to daily visitation based on ratios used for Disney.

In the July SEIS, table 24, for Alternative 2, (the CAMP alternative), visitation to the three Barracks Buildings were estimated at 242,000. In the February SDSEIS, the estimate for the same buildings is 63-106,000.

FAQs describes the difference as a change in assumptions of use from museum (40 average daily person trips dpt/1000 sf.) to a combination of conference (8 dpt), school (5 est dpt) and museum (30 dpt), and a reduction in how the daily person trips are distributed between lower week days and higher weekend days. No argument is presented in favor of the assumed change in building use nor is data presented to support the reduction due to shift in use of weekday rather than weekend. These changes must be presented in a way that makes sense and supported by numbers that explain how they were derived.

Using square footage of 45,000 sq. ft for first floor for all three buildings combined, and applying 40 /1000 sq. ft, (table 7, Feb. SDSEIS) gives 1800 daily person trips for employees and visitors. Person trips are two way, so the person/visitors per day would be 900/day. Assuming 6 open days/wk for museums, gives 280,000 annual visitors.

It is not clear how the DSEIS arrived at 106,000 annual visitors to these three buildings. Using one third each school, conference and museum, or about 14 person trips per day, gives 630 daily person visits. Using the Trust SDSEIS of 106,000 annual visits implies being open only 168 days per year, or 3.2 days/week, which makes no sense. Using the 630 daily visitors for an average of 5 days a week, would give 163,000 annual visitors. But that assumes less days than museums are open and infrequent conference use and five days for schools.

Without a clearer argument for why the Trust changed assumptions on building use from July to February, and without a demonstrable relationship between the new assumed uses and the annual visitation estimate, We will use a visitation rate of 200,000 for the public use areas of the three designated Montgomery St. barracks

Trust Funding for Rehab of Buildings 101 and or 102

The Trust 5 year Construction Plan appended to the annual Budgets, shows the Trust had planned in the Aug. 08 FY 08 plan to finance rehab of building 101, themselves, at a cost of \$11 million. For the Aug. 8 and Jan 09 FY 09 Plans, the Trust had shifted those funds from building 101 to building 102, increasing the estimate from \$11 mn to \$17 million.

In the event that the CAMP project does not go ahead, building 101 would be available for rehabilitation by the Trust perhaps in 2013, depending on fund availability.

A portion of Building 102 is the property of the National Park Service, to use as the NPS Presidio Visitor Center. The Trust Act retains jurisdiction for the Secretary of Interior over those portions of Building 102 as the Secretary deems essential for use as a Visitor Center.

In identifying 102 as a Trust managed and leased building in the FY 09 5 year construction plan, (\$1.2 million in annual revenues), the Trust will have to reach agreement with the NPS on another location for the Visitor Center. (See Presidio Trust Act, Section 103 b.) No such location has been identified in the SDSEIS. It is not clear whether the NPS has agreed to giving up the space reserved in 102 for its visitor center. Nor is it clear that the NPS has agreed to pay the Trust \$1.2 million/yr. for the right to occupy a portion of the building reserved for their use. The Final SEIS and MPU must identify the NPS Visitor Center location and size of the Center. It does not seem feasible to include a normal NPS park visitor center in the 30,000 sq. ft reserved in the Officers Club for the Heritage and Archeology Center. The role of the Visitor Center is central to the visitor experience and should be worked out with the NPS before adopting a Main Post Plan.

Visitation estimate for the Art Museum

In the July 2008 SEIS, CAMP visitation was shown as 300,000, taken from the CAMP proposal, noting that the estimate is about one third of the annual visitation to the de Young, which the SEIS stated is three times the size of CAMP.

In the Feb. 09 SDSEIS, A range of 300-400,000 is shown for CAMP, noting that it is expected to be in the 400,000 range in the initial years, and stabilize at the lower estimate in subsequent years. No further explanation was given for the 30% increase in estimate.

The Trust has estimated the Camp visitation as a ratio of de Young visitation per sq. ft of total space at the two museums, using visitation data from the de Young during the six month period Jan-July,2006, following its opening. in December 2005.

The de Young museum 2006 experience was used as the basis for CAMP presumably for 2008, and then forecast for 2030 based on Doyle Drive SEIS estimates for regional growth. Average Friday attendance at the de Young was used, divided by three, (based on size relative to CAMP), to estimate daily trip generation. The result is a ratio of 32.1 trips per 1,000 sq. ft of total museum space per day.

The Trust made a serious error in the estimating procedure by using only the portion of the CAMP museum that is new construction, leaving out almost a third of the museum's total area, and comparing that partial museum to the entirety of the de Young.

The table below shows Museum Square Footage for Gallery and other functions for CAMP, de Young, Legion, MOMA, Exploratorium, Asian and Disney Family. The data on visitation presented in the following table is from two full fiscal years, 2007 and 2008. received in emails from the museums.

Visitation per sq. ft of museum space for CAMP derived from the SEIS estimate of CAMP visitation and actual CAMP full museum space is half that of most museums, and 30% below MOMA. This is because The SEIS includes the CAMP space only for the new building (100,000 sq. ft) and improperly leaves out the 45,000 of space in building 101, which houses classrooms, and administrative staff. These functions are included in the four museum spaces with which it may be compared, and should be included in comparison with the full space of the de Young and other museums.

	<u>2007/2008 Visitation</u>	<u>Museum Area Square feet</u>	<u>Visitation per sq. ft.</u>	<u>CAMP Est</u>
DeYoung	1,200,000	292,000	4100	595.000
MOMA	600,000	225,000	2670	387,000
Legion	420,000	118,000	3560	516,000
Exploratorium	530,000	110,000	4820	698.000
Disney Family Museum*	350,000	78,000		4490
651,000 Asian Art		200,000		
CAMP*	300,000	145,000	2070	300.000

Total square footage comparisons of de Young and CAMP are inaccurate. The de Young museum has 292,000 total space; CAMP will have 145,000 sq. ft, including the original and revised proposed 100,000 new construction, plus the 45,000 sq. ft Building 101 where CAMP will have its administrative offices and an area for art classes. The de Young has 221,000 sq. ft of its 292,000 sq. ft space for admin., education, engineering, support, and public services. a cafe and store, the same functions that CAMP will have. Thus it is appropriate to compare the total space proposed by CAMP, not just the gallery, collection support and engineering functions in the new buildings.

Using the ratio of corrected total space of CAMP to deYoung, the table below shows what visitation at CAMP would be if at the same visitor pr sq. ft experienced at other museums. The results of this analysis show a range of 400-500,000 visitation for CAMP.

Museum total square footage is one measure to use when trying to determine what level of visitation might occur among several museums in the same city. However, museum attendance is determined by many factors besides total size. These factors include the nature of the museum contents and audience served (ie exploratorium and Cal Academy of Science has a broad reach to families), location and accessibility, role of special exhibits in boosting attendance, other attractions such as outdoor/indoor dining, educational programs, ambiance, etc. While all these factors must be taken into

account in determining likely visitation, the Trust SEIS estimate based on only two thirds of the CAMP Museum complex does underestimate likely visitation. Without information to the contrary, it is reasonable to estimate CAMP visitation at 450,000 over the long term future, rather than 300,000 included in the SEIS estimates.

The February 09 SDSEIS estimates 400,000 as a short term level but gives no year when the estimate would be reduced by 25% to the forecast long term rate of 300,000. Our estimate of 450,000 is the long term rate expected at least to be maintained over time.

Implications The more defensible CAMP visitation level of 450,000 as estimated visitation should be used in the SEIS to apply to trips, mode split, traffic (both inside and outside the Presidio) and parking demand associated with CAMP, a 50% increase over the long term level used in the February 2009 SDSEIS.

It is clear from the following table that CAMP might reasonably be expected to attract from 400-500,000 visitors per year over the long run, as have the other major museums in the City over the past two years. The information below is calculated by applying the visitation per sq. ft for each of the major five museums to the total square footage of CAMP. The same technique is applied to the new Disney Family Museum.

CAMP Visitation based on CAMP size (145,000 sq. ft) and visitation/sq. ft of five city museums, FY 2007, 2008 data

595,000 based on DeYoung
387,000 based on MOMA
516,000 based on Legion
698,000 based on Exploratorium
650,000 based on Disney Family Museum

Visitation estimate for the Disney Family Museum

The Disney Family Museum visitation is included in both the 08 and 09 SEIS's at 300-350,000, based on an article in Bloomberg News, 2008, Tables 24, 25 i

A recent article in the New York times (Apr 1, 09) reported the maximum attendance will be 517,000, based on 60 visitors per quarter hour, seven hours per day, six days per week. Mr. Benefield, the Disney Family Museum Director said they "are aiming for" 350,000. Tickets will be timed, so drop-ins may not be immediately accommodated. In conversations with the Disney Museum executives, they believed the summer months would be greater than the 67% of capacity estimated for the year as a whole. They cater to adults, including foreign tourists.

It is reasonable to assume that on average over the next 20 years, the Disney Family Museum may run between 65% and 75% of capacity, or from 350-400,000 visitors.

In the case of Disney the SEIS used the full complex of buildings, rather than just the main exhibit building, in calculating visitation per museum area. (See tables on person trips per sq. ft) The SEIS then applied the Disney ratio of visitation per total museum size to only part of the Fisher museum, arriving at the same level of visitation for a museum almost twice the total size of Disney. This clearly is apples and oranges again, as it was in the CAMP de Young comparison, and should be corrected.

Heritage/Archeology center

Another adjustment to correct the size of the Heritage Center used for the estimating visitation based on square feet. The Center is projected at an annual visitation is 255-305,000. based on the size relative to the size of the Disney Family Museum (and proposed art museum)

Based on the Site Plan for the Heritage and Archeology Center, Fig 3, p13, Feb. SDSEIS, the Center area may be estimated at 37,000 sq.ft.. This includes 7,000 sf. for the Archeology separate buildings and 30,000 sf in Building 50 (Officers Club), dedicated to the Center, as part of the 35,000 sf. building. A portion of the building is reserved for public events.

The Disney Family Museum, including Building 104 (60,000 sf) and the separate administrative building 122 (18,000 sf), has a total area of 78,000 sf. The History/Arch Center is about half the size of the Disney F Museum.

Based on this ratio of size of museum applied to the SEIS estimate for the DFM visitation of 300-350,00, the Heritage/Arch Center visitation would be 150-175,000, half that used in the February SDSEIS. Table 24 notes that park visitors are assumed to start their park visit at the Heritage Center; while some visitors may do that, the capacity of the building to double its square footage use appears unreasonable. The SEIS estimate should be reduced accordingly.

Summary of adjusted visitation estimates

(in thousands of annual visitors)

		<u>DSEIS</u>	<u>Adjusted Est</u>
Art Museum	300	450	
Disney Fam.Museum		350	400
Heritage Cntr	305	175	
Programmed and Open Space Events		400	400
Retail/Restaurant	330	530	
Cult/Ed Barracks		100	200
TOTAL		1785	2155

Other(Lodge,YMCA,Theater)	525	<u>525</u>
Grand Total	2310	2680
15% off for linked visits	2010	2330

Visitors related to new construction in the preferred Alternative, as corrected, will amount to 660,000, 40% of the estimated increase from current levels visitation. There will be an increase of about 800,000 from projects underway and planned that will take place whether or not the new construction projects are approved.

PARKING DEMAND

Underestimation of Peak Daily and Monthly Visitation

There is a very important error in the July 08 and Feb. 09 SEIS analysis of traffic and demand for parking: the failure to take into account the very large differences in monthly attendance at museums throughout the year, i.e., seasonality. The proposed three museums account for 700,000 of the 1,300,000 increase in visitation (SDEIS, p 143, table 24); not accounting for seasonal peaks for over half the visitors, results in a substantial under estimate in the SDSEIS for daily and weekend peak season visitation traffic and parking.

The monthly data collected from five city museums for the years 2007 and 2008 show clearly that monthly averages calculated from annual visitation leave out the very significant variation that is critical for estimating monthly, weekly and daily demand for parking, as well as traffic.

In summary,

- high months are from 2 to 3 times the visitation of low months
- peak months are about 1.5 times larger than the annual monthly average
- four months a year are clearly above average

Effect of competitive parking fees for visitors/employees

The SDSEIS introduces parking fees as a way to reduce the quantity of spaces demanded, for visitors and employees, compared to the number of spaces that would be demanded without fees. Even though it has been the announced policy of the Trust for many years to charge for parking, parking fees in non residential areas have been introduced only recently and in a small number of areas. Nevertheless, even at the relatively low hourly rate of \$____/hr, cars have found their way away from the charge lots (e.g. YMCA) to the free lots-- the Main Parade Ground. And ridership for employees has increased on the free Presidio downtown peak hour shuttle.

There is little question that parking fees reduce demand for parking. The questions not addressed adequately in the SEIS is by how much, and when will the policy be implemented. Rather than build into the DSEIS parking assumptions a competitive parking fee structure to dissuade employees and visitors from coming to the Park by auto, the Trust parking model assumes no fees. Rather, after calculating demand without fees, in spite of its policy that fees will be charge, it then estimates the percent reduction in demand that might occur with an unspecified parking fee structure.

The elasticity of demand in this case used by the Trust is somewhere below 5% (see pg. SDSEIS, page 60, and table 16). Yet all published studies on effects of parking fees on demand for parking in urban areas conclude that the elasticity is 30% or more. (See Victoria Transportation Institute publications and others by Professor D. Shoup of UCLA.) My communications with these reputable sources, and Transportation Planning firms in the San Francisco area confirm that a 5% reduction from parking fees at the

Presidio is way below what professionals would predict, even with current limited transit options.

Using a minimum reduction of 10% would reduce demand by 200 spaces under the SDSEIS demand levels, rather than the 100 spaces assumed at 5%. A 30% reduction effect from competitive rates would lead to demand falling by 600 spaces, enough to avoid underground parking.

The Trust has explained at public meetings that the parking plan would be introduced gradually, depending on the rate of building occupancy and uses at the Main Post. It is likely that street parking along and near the Main Parade would be added soon, perhaps before the Greening of the Main Parade; that parking lots would be built or expanded in the areas behind historic and other buildings near the Main Parade, and that underground garages would not be built until there was a clear indication of demand for such.

- An underground parking structure (proposed for 300 vehicles) at the Presidio bluff, north of the Fire House, is not part of the Doyle Drive project plans.
- The 100 space underground parking structure West of the planned art museum building, South of Moraga, would not be built at the same time as the proposed surface parking lot in that location.
- Underground parking at the new Lodge would be included at the time of construction, principally to serve Lodge visitors.

The parking demand in the DSEIS should be recalculated, assuming introduction of competitive fees and a more supportable expected effect of the specified fee structure.

PARKING SUPPLY AND LOCATION

The SDSEIS identifies many parking lots, street parking and underground parking structures proposed to meet the projected demand, after the removal of parking at the Main Parade Ground.

The SDSEIS calls for 360 parking spots on streets in the Main Post, 1230 in parking lots, and 565 in underground garages virtually all on or in the immediate area of the Main Parade Ground, the central area of the Park.

NPS policy and practice on parking throughout the National Park System including those in urban areas is to discourage auto use and to provide parking outside or close to the park periphery, and to provide shuttle service to the main park areas. (See for example, Mt. Vernon, Montecello, Mt. Rushmore)

The SDSEIS presents exactly the opposite policy: all the cars entering the Presidio for the purpose of visiting the central area of the Main Post are directed to parking in that area, which is the architectural center of the historic district. The SDSEIS proposes to

hide a portion of the parking areas behind historic buildings and in underground structures, in the only space available in that immediate area, along with highly visible parking along each of the streets surrounding the historic two parade grounds. There is no consideration of areas outside of the Main Post.

Alternative Parking Locations away from the center are not considered in the SDSEIS. In order to make the Main Parade Ground area more attractive, less congested, and to divert traffic away from the heart of the park, several areas should be examined in the SDSEIS to address the problem.

From a cursory review of possibilities, it may be possible to

- reduce street parking from 360 to 150 in the Main Post
- reduce surface parking lot spaces from 1230 to 700 in the main post
- eliminate underground parking at the Bluff, 400 spaces
- eliminate underground parking at the Herbst theater area, 100 spaces

In sum, reduce parking at the Main Post central area from 2155 spaces (SDSEIS) to 845 spaces

Adding Parking Spaces outside the Main Post Area

In order to accommodate the additional spaces needed for cars arriving to visit the Main Parade area, there are parking areas that can be added outside the central area of the Main Post. These include:

- NW of Ft Scott, in Area A, perhaps 200 spaces, for autos coming from the GG Bridge, with Trust, with shuttle service
- Lucas garage for use on weekends: 1200 spaces. Makes no sense to talk about building 400-500 underground spaces at the Main Post if those spaces may be available at Lucas at the periphery of the park on weekends. The peak demand for parking is on the weekends, 60% above weekdays.

In the case of *Lucas Digital Arts* at the Lombard Gate, the current ground lease contract reserves parking in LDA buildings to LDA discretion. It is now limited to employee and visitor parking exclusively for tenants in the Lucas complex. It is understood that a substantial share of the 1500 spaces are unused on weekends at this office complex. The Trust should explore with the lessee LDA an arrangement for those spaces to be used on weekends by park visitors at normal visitor parking fees.

The Trust would compensate Lucas for any related costs, and provide shuttle stops at the Lucas garage for service to the Main Post, a walk of about five short city blocks. It seems particularly wasteful to build new underground parking structures in the Main Post to satisfy weekend visitor demand when perfectly good nearby parking exists, largely unused on weekends.

PARKWIDE TRANSPORTATION, TRAFFIC, PARKING PLAN

The SDSEIS (page 66) briefly alludes to parkwide parking management. The Trust encourage the NPS to impose time limits and/or parking fees at Crissy Field areas under the NPS jurisdiction, i.e., basically north of Mason St. If such policies were not adopted or enforced, then parking management controls in the Trust Main Post area “would affect parking for Crissy Field (Area B)”. Parking at Crissy Field, Area B is at lots east of the Sports Basement for approximately 250 spaces.

Parking fees at the Main Post will have a spillover effect on NPS Area A parking at Crissy Field. Area A is already overloaded with cars on most weekends, with cars parked on all available grassy areas. Increasing demand for parking there, both from increased visitation to the Main Post and from parking fees in Area B will put additional strains on what is insufficient space in Area A. Increasing such space in the NPS area would be contrary to NPS policy of discouraging auto use and is not a feasible option.

The demand for and supply of parking at the Main Post District included in the SDSEIS cannot be seen in a vacuum. The Main Post is part of the Trust area B, where parking demand and supply exists in all areas. There are 2240 spaces in Area B allocated for employee parking in the 1994 GMPA (excludes Lucas garage, residential parking and Trust vehicle maintenance parking). Visitor parking spaces in Area B were shown as 3,080 spaces in the GMPA. (See Sierra Club Presidio Committee Comments on the Presidio Draft PTIP/EIS, Oct. 25, 2001, page 43.)

The Main Post parking supply is shown in the DSEIS, July 2008 page S-3, Alt. 4, as 1965 spaces. For the Preferred alternative, SDSEIS, p 60, table 15, supply is shown as 2,155, with up to 465 spaces added underground.

If the current total parking spaces in Area B is between 1965 and 2240 spaces, (GMPA and Sierra Club more detailed estimate by location) and the Main post is now approximately 750, including the Y, there are about 1500 spaces outside the Mainpost, excluding Lucas. If the Preferred Alternative is adopted, with 2155 spaces, it will be 60% of the total parking supply in Area B, with 40% outside of the Main Post District (again, excluding Lucas).

There are several parking areas within the NPS area A, surrounding Area B, which may be available or expanded to provide additional spaces accessible by shuttle to the Main Post. The total number of parking spaces by location in Presidio Area A may be obtained from the Park Service.

It is clear to the transportation planning authorities I have spoken to that a parking plan for the Main Post alone is insufficient to determine the long term traffic and parking demands for the entire Area B; secondly, since Area A, adjacent to Area B, is both a source of parking spaces and represents its own demand for parking, the impacts of changes in Area B, as proposed, cannot be fully estimated without considering the Park as whole.

Develop and publish a long term parkwide transportation plan

In order to fully understand the long term transpiration, traffic and parking impacts of the preferred alternative, there must be a parkwide transportation plan developed. A decision to add attractions and visitation to the main post without a long term complete parkwide transpiration plan would be based on partial and misleading information. It is a defect of the SDSEIS and must be corrected and the results shared with the public before issuing a Final DOE or Final SEIS.

RESPONSIBILITY TO ADHERE TO THE SECRETARY OF INTERIOR'S STANDARDS FOR NEW CONSTRUCTION IN HISTORIC AREAS.

Historic areas have been part of the conservation program of the Department of the Interior since 1906, and of the National Park Service since its establishment. (See Brief History of NPS, NPS.)

The NPS is in fact the country's assigned agency to advise government and private developers on the effects of new projects in National Parks and National Landmarks. The NPS has been in the business for 93 years, now with 90 NPS historic properties.

The Presidio Trust has had three opportunities over the past 12 years to review construction proposals: one at Letterman, replacing a non historic building at the periphery of the Park; one at the Public Health Service Hospital, rehabilitating the historic portion of a building for a new use, at the periphery of the Park; and now consideration of construction of three major projects in the heart of the National Historic Landmark District.

The NPS has the historical perspective and long term experience by which to judge the new proposals at the Presidio that exceeds that of the Presidio Trust. Current Board member have served from two to four years, and none have recognized experience and skills in historic or cultural resource conservation. Further, The Trust does not have a qualified Federal Preservation Officer required under the NHPA which could advise the Board. In view of this critical lack of qualified staff, The Trust contracted the services of an outside firm to prepare the FOE and facilitate the meetings of the 106 Consulting Parties. From examining the firm's website, it appears that the firm selected has little or no experience in determining the effects on historic buildings/districts from new construction or how to avoid, minimize or mitigate related adverse effects. (ICFJones& Stokes' website identifies the firm principally as in environmental planning; experience in historic preservation appears to be limited to building design and studies.

One of the most important observations made by the NPS in the section 213 report concerned the dramatic change in the relative area assigned to historic and non historic buildings at the Main Post, and specifically at the Main Parade Ground. The NPS found for the Main Post that the ratio of non-historic to historic building square footage under the Preferred Alternative would rise from 12% today to 26%.

More significantly, the Main Parade Ground would be most impacted by the MPU: the ratio of non-historic square footage would rise from 5% to 45%, thus dramatically changing the reality as well as the appearance of the historic area.

The NPS suggests the current ratio should be maintained, after allowing for demolition of non historical buildings amounting to 60,000 sq.ft.. That finding suggests that the allowable new construction could not exceed the level of demolition, ie, 60,000 sq.ft.. The Trust has already approved 20,000 sq. ft for the Disney Family Museum, and has placed another 20,000 square feet in reserve for infill needed to rehabilitate existing buildings. *That leaves a recommended 20,000 sq.ft.. ceiling for any new proposed construction.*

The MPU calls for 200,000 sq.ft.. of new construction among the three projects. There is no way the Secretary's Standards can possibly be met with such a mammoth disparity in the building areas. In fact, only the proposed 18,000 sq.ft.. expansion of the historic theater would fall within the ceiling of allowable new construction. The art museum and lodge would have to be reduced by 80% and 75% respectively from the proposed sizes.

I urge the Trust to give predominant weight to the findings and recommendations of the National Park Service in reaching its own conclusions.

To assist the Trust further, the Trust again should consult with the NPS, as it did in August 2008, to determine whether there is agreement that the Revised MPU meets the Secretary of Interior's Standards. If not, the MPU must be reissued to conform with those standards before continuing into the final FOE and resolution phase of the Section 106 process and before issuing the Final SEIS.

ADHERENCE TO NATIONAL PARK SERVICE POLICY GUIDANCE

A review of established NPS policies relevant to the proposals under consideration for the Presidio are instructive and may be found in an NPS publication from 1940 that are still relevant today. See [A Brief History of the National Park Service](#).

Applying the NPS policies to the Preferred Alternative, we find the proposal in direct conflict with five of the long established NPS polices:

1. The Art museum does not relate to the inherent values of the park and in fact weakens the enjoyment of those inherent values. (NPS policy 5)
2. The Art museum intrudes on the landscape way beyond the minimum. (NPS policy 10)
3. The Art Museum encroaches upon the national interest in the national park for the primary benefit of an individual, which should not be permitted. (NPS policy 13)

4. The Art Museum would provide a private leasehold, setting up largely exclusive benefits for an individual as against the common enjoyment, contrary to the fundamental purpose of the national park. (NPS policy 14)
5. Presidio National Park, in its entirety, and in particular the Trust Area B, would now be better served if administered, in large part, by park trained authorities. (NPS policy 6)

It behooves the Trust, in spite of its legislative flexibility in working with the National Park Service, to follow those policies that have served the nation well for the past century, and not take actions to amend the PTMP that would be contrary to those policies.

THE MAIN POST WILL BECOME THE MAJOR ATTRACTION AT THE PRESIDIO BASED ON THE INHERENT VALUES OF THE PARK WITHOUT THE NEED FOR NEW CONSTRUCTION

The Trust proposed amending the 2002 Management Plan to allow several major development projects at the Main Post. The unsolicited offer that led the Trust into the Plan Amendment process was from a former Trust Board member who asked to lease prime National Park land to build a large museum at the Main Parade Ground for the exclusive exhibition of his personal collection of contemporary art.

The Trust Board presently is composed principally of real estate construction contractors, developers and financial experts. They acted promptly to take the necessary steps to locate a world renowned art collection, housed in an ultra modern building, in the heart of the former military base. They subsequently stated their belief to turn the national park and historic landmark district into a “cultural and civic center, to revitalize the main post, where the attractions of an outstanding collection of modern art, a world class park lodge and a multi screen film theater would transpose an asphalt parking lot into a lively center of the arts and become a tourist destination.

The Trust neglected to acknowledge in the SDSEIS that plans were approved to have the same area become what could be a center of Western US History. Plans were announced and funding anticipated to rehabilitate the six red brick, two story barracks, to turn the parking area into an attractive gathering place, and to provide the visiting public with the kind of interpretation of history and educational programs that have been the hallmark of the National Park Service since its founding in 1916.

The size, design and location of the art museum, combined with already approved construction projects was determined by the NPS to be out of conformity with the Secretary of Interior’s Standards for Historic Places.

There seems to be no rationale to add a large new art museum building, lodge and theater to revitalize the Main Post, when the same thing can be accomplished within a few years using existing buildings in which to present to the public the inherent values of the park and historic landmark district.

Respectfully submitted,

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