

Comments on the SDSEIS: Environmental Impacts

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I. INTRODUCTION

To comment on the Presidio Trust's proposals for the Main Post, the Marina Community Association ("MCA") is submitting three documents for consideration. In April, as part of the Section 106 historical review, the MCA delivered comments to the Presidio Trust on the Draft Finding of Effect. Given the wide range of issues involved in the NEPA review, the MCA is submitting two additional, and separate, documents on the following topics: (1) process integrity and legal compliance, and (2) environmental impacts.

This memorandum focuses on the environmental impacts discussed in the Supplement to a Draft Supplemental Environmental Impact Statement ("SDSEIS"), released in February 2009.¹ The memorandum has four sections: visitation, historic resources and archaeology, visual resources, and the Heritage Center. This memorandum concludes that the preferred alternative would create significant negative environmental impacts, some of which are appropriately identified in the SDSEIS, while other impacts would be more severe than described in the SDSEIS.

With respect to visitation, it is likely that visitation to the art museum would be greater than projected in the SDSEIS. As a result, the intensity of negative impacts, such as traffic, failing intersections, and the demand for parking, are likely to be even more intense than expected. In addition to the transportation impacts, the preferred alternative would seriously threaten the integrity of the Main Post's historic and archaeological resources, which are the most significant elements of the National Historic Landmark District.

In terms of visual resources, the construction of the art museum, as proposed in the preferred alternative, would create a relatively large structure, with a modern design and with modern materials, at the highest point on the Main Post. The art museum would be an unacceptably disruptive visual focal point, severely disrupting the Main Post's visual resources.

Finally, the creation of the Heritage Center and the development of compelling historical programs should be among the Presidio Trust's highest priorities. The Presidio Trust should formulate more detailed planning regarding the Heritage Center, including governance, project timelines, and budgets. In designing and managing the Heritage Center, the Presidio Trust should actively collaborate with the National Park Service and individuals and organizations with expertise in historical interpretation and museum management.

¹ See THE PRESIDIO TRUST, SUPPLEMENT TO THE DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT (2009) [hereinafter SDSEIS].

II. VISITATION

A. Overview

The SDSEIS evaluates a broad range of environmental consequences from the proposed Main Post projects. Some of the most significant impacts – such as transportation, traffic, parking, air quality, noise, and cumulative impacts – would be directly determined by the level of visitation to the Main Post. Increases in expected visitation would compound these negative impacts in the Main Post and throughout the Presidio.

The SDSEIS explains the methodology for estimating visitation. For a variety of different land uses, such as office, retail, and residential, the SDSEIS assigns a “daily rate,” which is the number of one-way person trips per thousand square feet dedicated to each land use.² To analyze transportation issues – such as traffic and parking – the SDSEIS breaks down the daily rate for each land use into AM and PM peak periods.³

B. Visitation to the Art Museum

In addition to analyzing peak traffic impacts on a daily basis, the SDSEIS also projects total annual visitation to the Main Post. According to the SDSEIS, total annual visitation is projected to increase from 660,000 at present to more than 2 million visitors.⁴ Three projects are expected to generate about half of all of the visitors to the Main Post: the art museum, the Heritage Center, and the Walt Disney Family Museum.⁵ According to the SDSEIS, each of the three projects would have similar levels of visitation, although the art museum would attract slightly more visitors than the other two museums. The projections show approximately 300,000 to 400,000 visitors to the art museum, representing almost 20% of all Main Post visitors.

To estimate the visitation to the art museum, referred to as CAMP by its proponent, the SDSEIS uses data from the de Young for the first six months of operations following its reopening.⁶ Based on this data, the SDSEIS derives a daily person trip generation rate of 32.1 one-way trips per day.⁷ In other words, the SDSEIS assumes that the art museum will attract 16 daily visitors per thousand square feet.

Instead of basing the visitation rate on a ratio to the de Young’s total square footage, the SDSEIS should have focused on gallery square footage. Museums contain various functions in addition to galleries, such as public services, collection support, general administration, education, and engineering, security, and plant. The size of a museum’s gallery space is a better measure of its capacity to attract visitors than using its entire square footage.

² See *id.* at 47-49.

³ See SDSEIS, *supra* note 1, at 47-49.

⁴ See *id.* at 143.

⁵ See *id.*

⁶ See *id.* at 48. The acronym “CAMP” stands for Contemporary Art Museum at the Presidio. See the CAMP website <<http://www.camptoday.org/>>.

⁷ See *id.*

Table 1, below, shows gallery and total square footage at CAMP and comparable museums in San Francisco – the Legion of Honor, the de Young, and SFMOMA. The table shows CAMP with 144,000 total square feet of space, as reported in the SDSEIS. Gallery space would represent more than a third of CAMP, which is a significantly larger ratio than at the de Young or SFMOMA. CAMP’s gallery space is more than two-thirds the size of the gallery space at the de Young and almost equal to the gallery space at SFMOMA. By focusing only on total square footage, the SDSEIS considers CAMP to be much smaller than the de Young and SFMOMA. But because CAMP’s gallery space is more comparable in size to these other museums, CAMP would in fact have a greater ability to attract more visitors.

Table 1. Gallery Square Footage at Comparable Museums

	CAMP	Legion	de Young	SFMOMA
<u>Square Footage (in thous.)¹</u>				
Total	144.0	117.7	292.5	225.0
Including: Gallery	48.5	44.6	72.3	50.0
Gallery as % of Total	33.7%	37.9%	24.7%	22.2%
<u>CAMP as % of Other Museums</u>				
Total Square Footage	nm	122.4%	49.2%	64.0%
Gallery Square Footage	nm	108.6%	67.1%	96.9%

(1) See SDSEIS (2009), at 12 (total square footage for CAMP); DSEIS (2008), at 32 (gallery square footage for CAMP, equal to the entry gallery, event space, and exhibition galleries); Email from Michele Gutierrez-Canepa, Director of Finance, Fine Arts Museums of San Francisco, to Donald Green, Laurel Heights Improvement Association (on file with the Marina Community Association) (gallery and total square footage for the de Young and Legion of Honor); Email from Simon Blint, Head of Visitor Services, SFMOMA, to Mark Nagel, Marina Community Association (May 28, 2009) (on file with the Marina Community Association) (square footage for SFMOMA).

The SDSEIS assumes that CAMP will attract 16 daily visitors per thousand square feet of total museum space. To compare CAMP with other museums on the basis of gallery square footage, it is necessary to convert the daily rate from total square footage to gallery square footage. Table 2, below, presents these calculations. In the visitation calculations, the SDSEIS uses separate calculations for CAMP’s 100,000 square feet of new construction and the 44,000 square feet in Building 101.

The first column in Table 2 presents the visitation data for the new construction. The 100,000 square feet is multiplied by the rate of 16 daily visitors to produce 1,600 daily visitors. The second column shows the similar calculations for Building 101, which will be used for office functions and educational activities. The 44,000 square feet is multiplied by the rate of 10.0 daily visitors to produce 440 daily visitors.

The final column presents the summary calculations for the entire museum. The new buildings and Building 101 will attract 2,040 daily visitors. This figure is divided by the size of CAMP’s gallery space – 48.5 thousand square feet – to show that CAMP will attract 42 daily visitors per thousand square feet of gallery space.

Table 2. Projected Daily Visitation at CAMP

	CAMP		
	New Construction	Building 101	Total Museum
Total Square Footage (thous.)	100	44	144
Daily Visitors per thous. SF ¹	16.0	10.0	14.2
Total Daily Visitors²	1,600	440	2,040
Gallery Square Footage ³	nm	nm	48,462
Daily Visitors per thous. SF: Gallery	nm	nm	42

(1) The daily rate for the new construction is 32.1 two-way trips, or 16 visitors. See SDSEIS (2009), at 49 (showing 32.1 two-way person trips to the art museum). For Building 101, the SDSEIS uses a weighted average, with equal weighting to each half, of cultural and educational uses -- with a daily rate of 40 -- and offices uses -- with a daily rate of 15. In this analysis, which aims to project true visitors, and not office workers, the daily rate for office uses is not considered. The result is a blended daily rate of 20 trips, or 10 daily visitors per thousand square feet. See Telephone Interview with Amy Marshall, Presidio Trust (June 1, 2009).

(2) The DSEIS assumes that the new museum building attracts 1,600 daily visitors. See DSEIS (2008), at 91.

(3) According to the SDSEIS, the art museum would have 144,000 total square feet, including 70,000 square feet in the new gallery building. See SDSEIS (2009), at 12. Only a portion of the gallery building would be devoted to actual galleries. The DSEIS contains a more detailed breakdown of the museum's square footage. The art museum would have 48,462 square feet of gallery space, consisting of

Table 3, below, compares the daily visitation figures for CAMP from the SDSEIS with revised projections based on the daily rates from comparable museums. The blended visitation rate from the SDSEIS – 42.1 daily visitors per thousand square feet of gallery space – is greater than the rates from the Legion of Honor and for SFMOMA in 2007, but less than the rates for the de Young in 2007 and 2008 and for SFMOMA in 2008.

The table uses these comparable daily rates to calculate the expected total daily visitation to CAMP. Each daily rate is multiplied by the 48.5 thousand square feet of gallery space at CAMP. The highlighted figures show that attendance at CAMP could be higher than projected in the SDSEIS: from 15.0% higher, using SFMOMA in 2008, to 30.0% higher, using the de Young in 2007.

Table 3. Daily Visitation at CAMP: SDSEIS Projection vs. Projections Based on Comparable Museums

	CAMP in SDSEIS	Legion		de Young		SFMOMA	
		FY 2007	FY 2008	FY 2007	FY 2008	2007	2008
Daily Visitors per Thousand Square Feet	42.1	30.9	29.7	54.7	49.5	42.0	48.4
CAMP Gallery Square Feet (thous.)	48.5	48.5	48.5	48.5	48.5	48.5	48.5
Total Daily Visitors to CAMP	2,040	1,499	1,441	2,653	2,396	2,035	2,345
Calculated Projection Less SDSEIS Projection ¹	0	(541)	(599)	613	356	(5)	305
Difference in %	0.0%	(26.5%)	(29.3%)	30.0%	17.5%	(0.3%)	15.0%

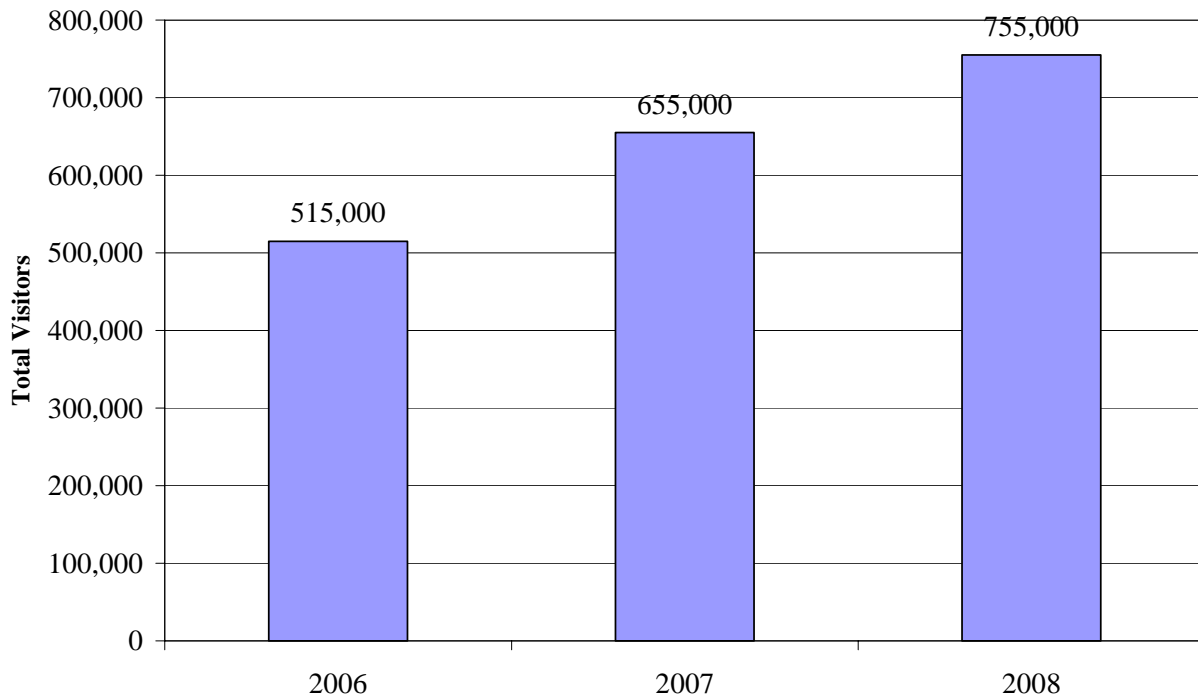
(1) Calculated as the total daily visitors based on each comparable museum minus the total daily visitors projected in the SDSEIS. As shown in Table 2, the entire art museum is expected to attract 2,040 daily visitors.

The SDSEIS reports that its daily rate is higher than the average rate from the de Young during its first six months of operations.⁸ The above analysis demonstrates that the visitation rate for CAMP in the SDSEIS is comparable to the rates from other museums, but the SDSEIS is not particularly conservative. Recent data from the de Young and SFMOMA show that the visitation rates from these museums are slightly higher than for CAMP.

In selecting the daily rate for CAMP, it is necessary to determine which comparable rate is most appropriate. The SDSEIS examined six months of data from de Young but did not review data from other museums. In fact, SFMOMA, with its focus on modern and contemporary art, is the most comparable museum to the proposed art museum in the Presidio. In addition to focusing on a similar style of art, CAMP would have almost the exactly same amount of gallery space.

To draw out the implications of the comparison of CAMP with SFMOMA, Figure 1, below, shows the total visitation to SFMOMA during 2006 to 2008. With a focus on modern and contemporary art, SFMOMA is the San Francisco museum that is most comparable to CAMP. SFMOMA has seen a striking growth in total visitation, from 515,000 in 2006, to 655,000 in 2007, to 755,000 in 2008. These impressive visitation numbers demonstrate the ability of a contemporary art museum to attract large crowds. SFMOMA has only 50,000 square feet of gallery space, which is almost identical to the proposal for CAMP.

Figure 1. SFMOMA Total Visitors, 2006 - 2008



Source: Email from Simon Blint, Head of Visitor Services, SFMOMA, to Mark Nagel, Marina Community Association (May 28, 2009) (on file with the Marina Community Association).

⁸ See *id.*

The SDSEIS projects total annual visitation to CAMP in the range of 300,000 to 400,000 visitors per year. The SDSEIS assumes that “[m]useum attendance is expected to be in the upper portion of this range in the initial year(s), and stabilize at the lower end of the range in subsequent years.”⁹ These figures in the SDSEIS only reflect visitation to CAMP’s new buildings, but total CAMP visitation would also include the visitors to Building 101. The SDSEIS does not clearly report accurate figures for total CAMP visitation, and this issue requires clarification.

With the same amount of gallery space and a similar style of art, SFMOMA in 2008 attracted almost double the number of visitors projected as the upper threshold for CAMP. For the past two years, SFMOMA’s total visitation has been significantly higher than the maximum visitation projected for CAMP. The above analysis suggests that the SDSEIS has underestimated the daily visitation for CAMP. Because the daily visitation projection is the main driver of many of the analyses in the SDSEIS, it is necessary to evaluate and potentially revise the analysis in the SDSEIS.

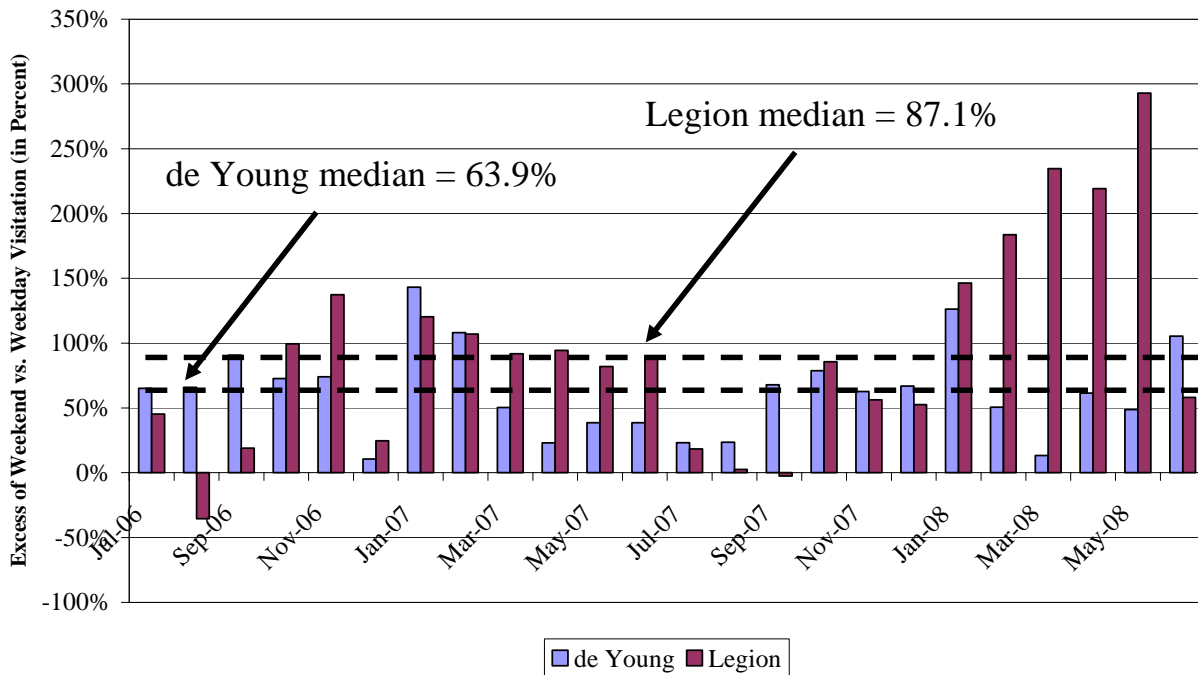
⁹ *Id.* at 143.

C. Weekend and Seasonal Visitation

In the analysis of traffic, the SDSEIS examines peak weekday traffic but does not consider weekend traffic. The SDSEIS states that office traffic at the Main Post on the weekends would only be fifteen to twenty percent of the volume on the weekdays. Furthermore, weekend traffic would be more evenly distributed during the day, instead of being concentrated during peak rush hour.¹⁰

Visitation to museums is substantially higher on the weekends than on weekdays. Figure 2, below, shows the percentage difference between weekend and weekday visitation at the de Young and Legion of Honor over a two-year period. During this period, weekend visitation was 63.9% higher at the de Young and 87.1% higher at the Legion of Honor than on weekdays. The data shows variation around these medians, with some months having even higher weekend visitation. Less complete data from SFMOMA shows a similar pattern, with weekend attendance 35.1% higher on the weekend than on weekdays.¹¹

Figure 2. Weekend vs. Weekday Visitation at the de Young and Legion of Honor, July 2006 – June 2008



The SDSEIS breaks down the total Main Post visitation according to the Main Post’s various activities and destinations, such as cultural, recreational, and other uses.¹² Almost all of the

¹⁰ See *id.* at 47.

¹¹ See Email from Simon Blint, Head of Visitor Services, SFMOMA, to Donald Green, Laurel Heights Improvement Association (Sept. 23, 2009) (on file with the Marina Community Association). This calculation excludes Thursdays, which has higher attendance due to extended hours in the evening.

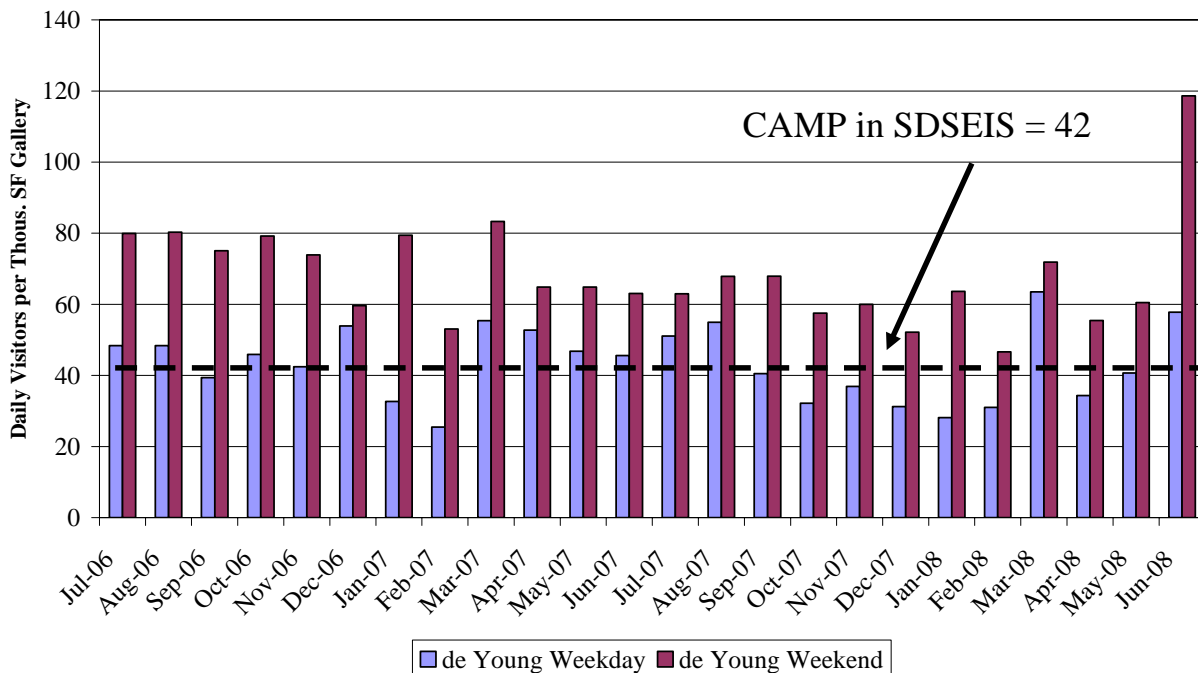
¹² See SDSEIS, *supra* note 1, at 143.

activities proposed for the Main Post would have higher visitation on weekends than weekdays. The three most significant institutions – the art museum, Heritage Center, and the Walt Disney Family Museum – are projected to account for about half of all Main Post visitation. These three museums would have peak visitation on the weekends. Other uses, such as programmed uses, the restaurants, and retail, would also likely have higher visitation on the weekends.

The visitation and traffic analysis in the SDSEIS also does not consider seasonal variation in visitation patterns. This omission is puzzling because even the SDSEIS acknowledges that “[p]eak visitor use would occur primarily on summer weekend days and holidays.”¹³ Figure 3, below, compares CAMP’s daily visitation rate with the monthly averages at the de Young – for weekdays and weekends – over a two-year period.

This analysis underscores the importance of considering both weekends and seasonality. Figure 2 visually demonstrates that weekend visitation, especially in the summer and fall, consistently produces daily visitation rates that would significantly exceed the assumed level for CAMP. Median daily weekend visitation to the de Young in the summer of 2007 was 65.5, while median winter weekday visitation in the winter in 2007-2008 was 31.1. The summer peak was 110% greater than the winter low.

Figure 3. Weekend and Weekday Visitation at the de Young, July 2006 – June 2008



The analysis of the SDSEIS needs to reconsider the decision not to include an analysis of weekend and seasonal visitation. The analysis should determine whether the increase in visitation from some uses, such as the museums and other recreational activities, would exceed

¹³ *Id.* at 145.

the decrease in visitation from office workers. If weekend visitation, with seasonality, is higher than average weekday visitation, the traffic projections, as well as the analyses that are dependent on the traffic projections, should be revised.

D. Transit

According to the SDSEIS, approximately eighteen to twenty percent of Main Post trips would use transit.¹⁴ The SDSEIS further projects that MUNI would be the largest transit provider for the Main Post, handling forty-eight percent of the AM peak trips and forty percent of the PM peak trips.¹⁵

Following the release of the DSEIS,¹⁶ MUNI issued a memo analyzing the financial impact of the projected levels of ridership. According to MUNI's analysis, providing the level of service forecasted in the DSEIS could cost MUNI an additional \$7.2 million in capital costs on new vehicles plus \$3.5 million in additional annual operating costs.¹⁷ Given MUNI's dire budget constraints, MUNI is highly unlikely to spend additional resources on serving the Presidio.¹⁸ In anticipation of potential problems with MUNI, the SDSEIS states that the Presidio Trust would increase service from PresidiGo in order to satisfy future increases in demand for transit.¹⁹

The discussion of transit in the SDSEIS contains a high degree of uncertainty. These issues are material to the larger environmental impacts for the Presidio and require further analysis. The following questions should be addressed.

- To what degree can transit providers reasonably offer the level of service projected in the SDSEIS?
- If transit providers cannot provide the full level of service projected, what gap in coverage may occur?
- Can PresidiGo fully cover this gap in transit service? If so, at what cost to the Presidio?
- If transit providers, including PresidiGo, cannot offer the level of service projected in the SDSEIS, what will be the consequences for overall visitation? What will be the impact on total visitation? How will these visitors travel to the Presidio?
- Will the number of trips by automobiles be higher? If so, what will be the consequences for other environmental impacts, such as traffic and parking?

¹⁴ See *id.* at 52.

¹⁵ See *id.* at 62.

¹⁶ See THE PRESIDIO TRUST, DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT 100 (2008) [hereinafter DSEIS] (providing the breakdown of transit ridership by transit provider).

¹⁷ See Memorandum from Peter Straus, Rana Ahmadi, and Jerry Robbins, San Francisco Municipal Transportation Agency, to the Presidio Neighborhood Representatives Working Group 4 (Oct. 6, 2008) (on file with the Marina Community Association).

¹⁸ See, e.g., Rachel Gordon, *Critics Assail S.F. Muni Budget Cut Proposals*, S.F. CHRON., Apr. 8, 2009, at B-1.

¹⁹ See SDSEIS, *supra* note 1, at 67; see also Presidio Trust, Main Post Planning Workshop: Transportation 22 (April 22, 2009) <<http://www.presidio.gov/trust/projects/mp/mpdocs.htm>> [hereinafter Transportation Workshop].

E. Traffic

The SDSEIS analyzes the impact of the preferred alternative on traffic in the Presidio and the surrounding neighborhoods. According to the SDSEIS, ten intersections would have unacceptable levels of peak service. After utilizing mitigation measures, which would require the installation of traffic signals and, at some intersections, the addition of a dedicated turn lane, these intersections would return to acceptable service levels.²⁰

The traffic section in the SDSEIS contains several gaps in the analysis that require clarification. According to the Presidio Trust, cut-through traffic represents almost half of the current traffic in the Presidio.²¹ The SDSEIS does not explain how the traffic analysis deals with cut-through traffic. With cut-through traffic representing such a significant share of total Presidio traffic, it is essential to understand how it is projected to grow in the future. If the SDSEIS contains assumptions for cut-through traffic that are too low, the projections should be revised. Higher levels of cut-through traffic would produce even worse service levels at intersections than currently projected.

In one passage, the SDSEIS remarks that “[t]he poor operating conditions at these intersections reflect the increase in traffic volumes traveling to and from the Presidio, and relatively modest increases in traffic resulting from regional growth.”²² The SDSEIS does not provide any further explanation of this comment. If increases in traffic from regional growth refer to cut-through traffic, the comment could mean that the projections show a relatively small future impact from cut-through traffic.

This assumption about regional growth is puzzling in light of the approach taken in the Presidio Trust Management Plan.²³ According to the SDSEIS, “the final PTMP EIS projected that regional growth throughout San Francisco and the greater Bay Area would contribute to increased traffic on roadways near the Presidio.”²⁴ Clarification is required. Is the treatment of traffic from regional growth in the SDSEIS consistent with the approach taken in the PTMP? How does this issue relate to cut-through traffic?

With so many intersections projected to have failing levels of service, it is essential to devote further scrutiny to the plans regarding mitigation measures. Of the ten intersections that would be most seriously affected by traffic, half are within the jurisdiction of the City and County of San Francisco.²⁵ According to the Trust, decisions about the management of these intersections, including whether to install traffic signals, will be made by the City.²⁶ Many of the neighbors who live at these affected intersections oppose the use of traffic signals, and public opposition to traffic signals could cause the City to decide against installing them. Moreover, the City may

²⁰ See SDSEIS, *supra* note 1, at 65.

²¹ See Transportation Workshop, *supra* note 19, at 8 (reporting that cut-through traffic represents 49% of total Presidio traffic in 2009).

²² SDSEIS, *supra* note 1, at 57.

²³ See THE PRESIDIO TRUST, PRESIDIO TRUST MANAGEMENT PLAN: LAND USE POLICIES FOR AREA B OF THE PRESIDIO OF SAN FRANCISCO (2002) [hereinafter PTMP].

²⁴ SDSEIS, *supra* note 1, at 53.

²⁵ See *id.* at 58.

²⁶ See Transportation Workshop, *supra* note 19, at 3.

independently decide not to install traffic signals due to cost constraints. What would be the result if these five failing intersections do not receive traffic signals?

With respect to traffic signals inside the Presidio, the Presidio Trust has also explained that traffic signals would be subject to Board approval as well as both NEPA and NHPA review.²⁷ The analysis should identify the length of time that would be required to obtain these internal and external approvals. Of particular note, the recent Section 213 Report from the National Park Service found that the installation of traffic signals would change the fundamental character of the Presidio and would therefore be an adverse effect under the National Historic Preservation Act.²⁸

The Presidio Trust has further stated that it would try other solutions – such as implementing transportation demand management measures, increasing intersection capacity, and discouraging cut-through traffic – before installing traffic signals.²⁹ The SDSEIS identifies traffic signals as the premier mitigation measure to restore acceptable service levels. It is therefore necessary for the Presidio Trust to clarify its strategy with respect to mitigation. With the SDSEIS projecting such severe traffic impacts, it is important to understand which mitigation measures will be tried and what the expected results are likely to be.

The traffic analysis depends on the visitation projections for peak AM and PM travel. The earlier analysis of this memorandum suggests that the visitation projections in the SDSEIS for the art museum may need to be higher. If these projections are in fact increased, the traffic analysis should be revised accordingly.

F. Parking

The SDSEIS examines the adequacy of parking to meet the expected level of visitation. The SDSEIS concludes that “[u]nder all alternatives, total parking demand at the Main Post could potentially exceed supply.”³⁰ In other words, the supply of parking lacks sufficient excess capacity to ensure that demand will be met. Previous sections of the memorandum have argued that the projections for visitation in the SDSEIS may be too low. If further analysis confirms that the visitation projections should be higher, the plans for the supply of parking should be adjusted accordingly.

G. Impacts on Pedestrians

The SDSEIS states that the Presidio Trust is developing a network of pedestrian and multi-use trails as specified in the Presidio Trails and Bikeways Master Plan.³¹ The SDSEIS envisions a dramatic increase in visitation to the Main Post, from 650,000 annual visitors to more than two million,³² and more than eighty percent of these visitors will arrive by automobile or transit.³³

²⁷ See *id.* at 5.

²⁸ See ELAINE JACKSON-RETONDO, NAT’L PARK SERVICE, SECTION 213 REPORT: PRESIDIO OF SAN FRANCISCO NATIONAL HISTORIC LANDMARK iv (2009) [hereinafter SECTION 213 REPORT].

²⁹ See Transportation Workshop, *supra* note 19, at 7.

³⁰ SDSEIS, *supra* note 1, at S-13.

³¹ See *id.* at 61.

³² See *id.* at 143.

Under the preferred alternative, substantially greater numbers of pedestrians will spend time in the Presidio – walking, running, or bicycling. At the same time, these pedestrians will have to share the Presidio with significantly more vehicles, which will create serious safety risks for people on foot or bicycles. As part of this environmental review, the Presidio Trust should thoroughly evaluate its plans for developing paths that simultaneously provide pedestrian access to the Presidio and ensure pedestrian safety.

III. HISTORIC RESOURCES AND ARCHAEOLOGY

The Presidio Trust Act instructs the Presidio Trust to pursue various objectives, some of which are unfortunately in tension with each other. The Presidio Trust must both manage and improve the Presidio’s property,³⁴ and it must implement programs that increase government revenue “to the maximum extent possible.”³⁵ These commercial activities, however, must be tempered by the overarching objective of historic and environmental preservation. In oft-quoted language, the Presidio Trust Act states:

[T]he Presidio’s significant natural, historic, scenic, cultural, and recreational resources must be managed in a manner which is consistent with sound principles of land use planning and management, and which protects the Presidio from development and uses which would destroy the scenic beauty and historic and natural character of the area and cultural and recreational resources.³⁶

In recognition of these contradictory goals, the Presidio Trust Management Plan affirmed that “[t]he Trust will protect the integrity of the National Historic Landmark District while undertaking changes that restore the Presidio’s vitality.”³⁷

The SDSEIS reports that the preferred alternative would have serious negative impacts on the Presidio’s historic resources. The demolition of historic structures would adversely affect those structures as well as the National Historic Landmark District (“NHLD”),³⁸ and new construction would “alter the association, setting, and feeling of the historic resources within the NHLD.”³⁹

The Marina Community Association has submitted a separate memorandum regarding the impact of the preferred alternative on the Presidio’s historic resources.⁴⁰ Those comments, submitted to the Presidio Trust as part of the Section 106 historical review, should also be consulted with respect to the NEPA review.

³³ See *id.* at 52.

³⁴ See Presidio Trust Act § 104(a).

³⁵ *Id.* § 104(c).

³⁶ *Id.* § 101(5).

³⁷ PTMP, *supra* note 23, at 11.

³⁸ See SDSEIS, *supra* note 1, at 167.

³⁹ *Id.* at 169.

⁴⁰ See Mark Nagel, Alan Silverman, Martin Beresford, Comments on the Draft Finding of Effect for the Main Post Update, February 2009 (Apr. 21, 2009).

The Section 213 Report from the National Park Service, which was prepared as part of the Section 106 historical review, should be included in the NEPA review, as well. The Section 213 Report, which takes a comprehensive view to adverse effects, ominously concludes that the cumulative adverse effects would seriously threaten the Presidio's historic integrity.

Implementing the entire suite of projects proposed in the revised draft Main Post Update and the additional projects described above, will seriously threaten the integrity of the Main Post, the historic core of the National Historic Landmark District, to a degree that cannot be mitigated to an acceptable level, which would significantly diminish the integrity of the Presidio of San Francisco National Historic District.⁴¹

IV. VISUAL RESOURCES

The preferred alternative would allow 253,000 square feet of new construction on the Main Post, and the art museum and lodge would represent most of the new construction. The revised proposals in the preferred alternative include design modifications that lessen the negative impact on visual resources. For example, the lodge would have transparent linking corridors, and most of the art museum's new construction would be below ground.⁴²

After evaluating the impact of this new construction on the Main Post's visual resources, the SDSEIS concludes that "the lodge and the art museum would not create a visually dominant mass because the Montgomery Street Barracks and the Main Parade form a strong visual and spatial unity that can withstand the addition of this new construction."⁴³

While the SDSEIS correctly observes that the art museum's visual impact "would be considerably less than that proposed in Alternatives 2, 2A, and 3,"⁴⁴ the SDSEIS incorrectly concludes that the new construction would not become visually dominant. Although the preferred alternative is an improvement over the previous proposals, the proposed new construction would in fact have a profound negative impact on the Presidio's visual resources.

The SDSEIS finds that the new construction would not degrade the Presidio's visual character, but the analysis in the SDSEIS does not support this conclusion. The SDSEIS observes that the height of the art museum's roof would be slightly lower than the highest point of the bowling center's roof.⁴⁵ The art museum's roof would be lower than the peak of the bowling center's roof, but the art museum, with a flat roof and larger volume, would have a larger and more striking visual profile than the bowling alley.

The SDSEIS also states that "the art museum would create a visually prominent built edge to the Main Parade that would reinforce the definition of the open space more than the existing bowling

⁴¹ SECTION 213 REPORT, *supra* note 28, at 22.

⁴² See SDSEIS, *supra* note 1, at S-10.

⁴³ *Id.*

⁴⁴ *Id.* at S-11.

⁴⁵ See *id.* at 133.

center.”⁴⁶ This somewhat confusing sentence seems to be saying that the larger volume of the art museum would make a viewer more aware of the surrounding open space, perhaps because there will be less of it. With a width of 100 feet, the art museum would be 20 feet wider than the bowling alley.⁴⁷ In other words, the art museum would be 25% wider than the bowling alley, which is a significant increase in size. It is unclear how a larger building would reinforce the open space.

Although the proponents of CAMP have released design concepts for the art museum, none of the Presidio Trust’s materials show any designs of the building. Even so, the commentary in the SDSEIS includes some description of the design. According to the SDSEIS, the bowling alley’s “undistinguished” building would be replaced by “an architecturally distinguished building with glazing on three of its four sides,” and the art museum would have a “modernist or minimalist design vocabulary.”⁴⁸ The art museum would be built with visually striking materials, and its modern, “distinguished” design at the top of the Main Post would sharply contrast with the traditional architectural style of all of the surrounding buildings. This structure, due to its design and materials, would inevitably become the visual focal point of the Main Post.

Additional details about the building support this conclusion. The east and west walls of the art museum would be more than 300 feet long, compared to the bowling alley’s walls of 180 feet.⁴⁹ The additional 120 feet of length represents an increase of 67%. The art museum’s longer profile would obstruct views, draw viewers’ attention, and become the focal point on the Main Post. The SDSEIS states that the art museum’s “vegetated” roof would help the museum blend into the landscaped surroundings.⁵⁰ On the contrary, a green roof, like the glazed walls and the modern design, would be another striking design feature that would dramatically differentiate the building from the Presidio’s historic setting and further solidify the art museum as the focal point of the Main Post.

The SDSEIS presents visual simulations of the museum and concludes that the building would not have an unacceptable impact on views. The approach in the SDSEIS is fundamentally flawed for two main reasons. First, its wire frame analysis is inherently misleading. The SDSEIS imposes a wire frame outline of the building on a photograph of the existing condition, but the image is misleading because it does not convey the full visual impact of solid walls. If the wire frame were replaced with a featureless, solid form, viewers would have a more accurate appreciation of the new building’s volume and impact on views.

Second, the wire frame analysis deliberately avoids a presentation of the museum’s design. Many of the objections to the simulations in the DSEIS arose because of the building’s design, which is an appropriate basis for criticism. The Revised Draft Main Post Update (“RDMPU”) includes conceptual drawings of the lodge.⁵¹ If the RDMPU contains images of the lodge, why

⁴⁶ *Id.*

⁴⁷ *See id.*

⁴⁸ *Id.*

⁴⁹ *See id.* at 134.

⁵⁰ *See id.*

⁵¹ *See* THE PRESIDIO TRUST, REVISED DRAFT MAIN POST UPDATE TO THE PRESIDIO TRUST MANAGEMENT PLAN 32 (2009) [hereinafter RDMPU].

does it omit images of the museum? This omission is especially troubling given the public's intense concern regarding the art museum's design.

A comparison of the available images for the lodge and the art museum illustrates the importance of design in the analysis of visual impact. In the conceptual rendering of the lodge in Figure 4, below, the new lodge buildings seamlessly blend into the surroundings of the Old Parade. The image accurately reflects the description of the lodge in the Main Post Update:

The Presidio Lodge will use an architectural style that is compatible with the simple, straightforward architecture that characterizes the Main Post but will have detailing and design that differentiate it from historic buildings. Architectural features will include porches, roof overhangs, punched windows, compatible building materials and colors, and gabled or flat roofs oriented north/south.⁵²

With red, sloping roofs, porches, and white walls apparently made with wood slats, the lodge buildings would adopt the design cues from other buildings in the Presidio, such as the recently renovated buildings along Funston Avenue.⁵³ The Main Post Update presents photographs of these Funston buildings just above the artist's conception of the lodge. The Main Post Update therefore seems to have implicitly adopted the view that the lodge should be acceptable in part because its design adheres to the existing style at the Main Post.

Figure 4. Conceptual Rendering of the Lodge Along the Western Edge of the Old Parade



Source: THE PRESIDIO TRUST, REVISED DRAFT MAIN POST UPDATE TO THE PRESIDIO TRUST MANAGEMENT PLAN 32 (2009).

⁵² *Id.* at 35.

⁵³ *See id.* at 32.

Figure 5, below, shows one of the images of CAMP that has been released by the museum's proponent. The modern design, glass windows, and white walls starkly contrast with the subdued, traditional structures on the Main Parade. The Montgomery barracks are the jewels of the Main Post. Instead of highlighting these magnificent buildings, the shining brilliance of the art museum would push the barracks buildings into the background. Even with its revised design, the art museum in the preferred alternative would become the focal point of the Main Post, to the detriment of the Presidio's historic structures.

The current design of the art museum is not consistent with the design guidelines from the PTMP. The PTMP cites the Secretary of the Interior's Standards for Rehabilitation, which state that the "new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environs."⁵⁴ The PTMP further states that the "[s]cale, massing, height, materials, and color of infill construction must be compatible with the character of adjacent buildings."⁵⁵

The Main Post Update has presented a design concept for the lodge that sensitively conforms to the Presidio's surroundings, in accordance with the Secretary's Standards and the PTMP. The design for the art museum, although improved since June 2008, continues to struggle against the Presidio's surroundings, and it clearly does not conform to the design principles in the PTMP. If the lodge can have a design that is compatible with the Presidio's existing architecture, can the design for the art museum meet the same standard?

Figure 5. Conceptual Rendering of the Art Museum



Source: Seth Rosenfeld, *Presidio Revision Still Not All Right, Foes Say*, S.F. CHRON., Feb. 28, 2009, at B-1 (image at < <http://www.sfgate.com/cgi-bin/article.cgi?f=c/a/2009/02/28/BAR0166JLE.DTL>>)

As presented in the SDSEIS, the analysis of impacts on visual resources is inadequate. Determining whether a proposed building would become a visual focal point is the fundamental

⁵⁴ PTMP, *supra* note 23 (in unpaginated document, Chapter 1, Cultural Resources Section).

⁵⁵ RDMPU, *supra* note 51, at 15 (quoting the PTMP).

component of this analysis. Buildings draw viewers' attention not just due to their size and shape, but also because of their design. The analysis should be revised to include visual simulations that include actual building designs as they would be seen from different perspectives around the Main Post. The current design of the art museum in the preferred alternative does not comply with the design guidelines in the PTMP. The art museum would become the primary focal point on the Main Post, severely degrading the Main Post's visual resources.

V. HERITAGE CENTER

One of the main proposals in the Main Post Update is the creation of a Heritage Center. Much of the public opposition to other proposals in the preferred alternative, such as the art museum and lodge, has been directed at the Presidio Trust's perceived lack of focus on the Presidio's history. At public meetings, public workshops, and in written comments, the public has strongly urged the Presidio Trust to develop compelling programming around the Presidio's magnificent history.⁵⁶

Consistent with the Presidio Trust Act's mandate to preserve the Presidio's history, as well as the public's interest in this issue, historical programming should be a central feature of the Main Post's development. The Main Post Update outlines some potentially compelling concepts for the Heritage Center. However, with so much attention devoted to the art museum and lodge, the Presidio Trust's commitment to developing its history is not clear, at least to the public.

As the Main Post proposals move forward, the creation of the Heritage Center should be a top priority. It would be helpful for the Presidio Trust to develop concrete plans that can be shared with the public. Items of interest would be a project timeline, budget, and staffing. It will also be essential to understand how the Presidio Trust plans to work with the National Park Service and other authorities that have expertise in historical interpretation and museum management.

Possessing a unique and special combination of historical and natural resources, the Presidio deserves nothing less than a world class history museum.

⁵⁶ See, e.g., Presidio Trust, Presidio Trust Main Post Workshop Series Summary 1 (Dec. 31, 2008) <<http://www.presidio.gov/trust/projects/mp/mpdocs.htm>>.