



NEIGHBORHOOD ASSOCIATIONS FOR PRESIDIO PLANNING

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Cow Hollow
Association

Golden Gate Valley
Neighborhood
Association

Lake Street Residents
Association

Laurel Heights
Improvement
Association

Marina
Community
Association

Pacific Heights
Residents
Association

Planning Association
for the Richmond

Presidio Heights
Association of
Neighbors

Presidio Terrace
Association

Sea Cliff Properties
Association

West Presidio
Neighborhood
Association

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

Dear Directors and Messrs. Grubb, Middleton and Pelka:

As a coalition of 11 neighborhood groups bordering the Presidio, Neighborhood Associations for Presidio Planning (NAPP) respectfully submits our comments regarding the following National Environmental Policy Act (NEPA) documents:

Revised Draft Main Post Update to the Presidio Trust Management Plan (Feb 2009);

Draft Supplemental Environmental Impact Statement (Feb 2009).

Via this letter NAPP also attaches a hard copy of oral comments delivered at the April 21, 2009, meeting by NAPP member, the Marina Community Association (MCA), which was held for consultation on Section 213 and Section 106 of the National Historic Preservation Act (NHPA). Several NAPP member associations commented at that meeting. NAPP has since adopted these MCA comments (last pages 1- 6 here) as our NAPP comments on the document:

Draft Finding of Effect for the Main Post Update (Feb 2009).

NAPP delegates from our 11 member groups have been meeting monthly since 1989 to monitor activities and respond to issues related to the Presidio, how they affect our neighborhoods and stewardship of the Presidio National Park. As the comments contained in NAPP's prior related comment letters dated October 15, 2007, December 17, 2007, and October 25, 2008, directly apply in nearly all respects to the Preferred Alternative, NAPP hereby incorporates those three letters by reference.

In addition to these prior letters, our Section 106 consultation to date and endorsement of MCA comments there, as well as NAPP participation in the Peoples Neighborhood Representative Work Group established under the auspices of the San Francisco Board of Supervisors, NAPP submits the following:

NAPP finds no significant difference between the original Proposed Alternative and the Trust's "Preferred Alternative." The reductions in height and square footage in one building

are more than offset by the sprawl and increased amount of new construction and demolition of existing structures. The cumulative effect remains a problem.

1. CAMP Imposes Overwhelming Adverse Impacts on the Main Post.

The new CAMP is just as troubling as the original proposal. Instead of one large, ultra-modern building at the head of the Main Parade, the building has been split up into a sprawling complex of up to three structures, at least two of which will be connected, accompanied by surrounding hardscape. The new complex will have an even larger hardscape footprint and more total square footage than the original CAMP. The adverse environmental and historic impacts will be just as severe, if not more so, than the original CAMP proposal.

In lowering CAMP's height from its original design, CAMP will now be spread out over a much larger area of the Main Post and continue to have a wholly inappropriate, dominating presence at the head of the Main Parade with its modern design concepts. Extending out from the main building's footprint, CAMP will occupy nearly the entirety of its original Main Parade Ground site through its massive roofline, sunken courtyards, plazas, patios, bridges, staircases, walkways, berms and landscaped walls. Its huge grass roof is little more than a LEED gimmick that will undermine the integrity of the Main Post.

Situated directly behind and connected to the main CAMP building will be a second new building, a large, windowless, impersonal box. The original CAMP partially recognized its parking needs by proposing a 35,000 sq. ft. underground garage. The new Preferred Alternative relocates the garage to a new site behind CAMP's main building right next to the box. It is not clear who will pay for this large, new underground garage. The absence of any indication in the new Main Post documents that CAMP will pay for it implies that the financial burden of the garage has been transferred from CAMP's proponent to the Trust.

In addition to CAMP creating a significantly increased parking and traffic burden for the Main Post, CAMP also proposes to close the portions of the adjacent streets, Sheridan Avenue and Arguello Boulevard, which will add to CAMP's dominating presence at the head of the Main Parade and further exacerbate the parking and traffic congestion in the area.

2. The Lodge Imposes Significant Adverse Impacts on the Main Post.

The slightly re-configured hotel facility will still be far too large of a structure to be located on the historic Main Parade. The lodging complex, while slightly reduced in overall square footage, will still involve four end-to-end, lengthy buildings on the Main Parade, three of which are so close together that they essentially will form a solid wall between the two historic parade grounds. The fourth new building that will house a restaurant will extend the new, wall-like effect along the Main Parade. Also, in front the Lodge situated on the Main Parade Ground will be more new construction, consisting of a large building without walls that supposedly was previously vetted and approved by the Trust through what NAPP believes was a flawed process that should have been part of the New Update's attempt to re-write the PTMP.

3. The Parking and Traffic Created by the Preferred Alternative Impose Significant Adverse Impacts on the Main Post and on the Entire Presidio.

The Trust's Preferred Alternative seriously understates the projected number of people visiting the Main Post. In addition to the addition of CAMP, the Lodge, the Film Center, the Heritage museum, and the Disney museum with its projection of 350,000 to 400,000 annual visitors, there will be also be visitors to the expanded Chapel as a lucrative wedding venue as well as all the other current and future attractions at the Main Post, including event uses, such as cultural festivals, outdoor theater and historic military uses, and miscellaneous uses, such as weekday and weekend drill-exercise use by youth groups.

While the Presidio has implemented a parking and traffic policy of removing all on-street parking from nearly everywhere else in the Presidio, the new parking plan proposes to overload the Main Post streets with hundreds of on-street parking spaces. Also, scattered about the Main Post, the Preferred Alternative plans to have approximately two dozen off-street parking lots ranging from 5 spaces to 500 spaces, many of which are tucked behind the Main Post's historic buildings. With the proposed limited access points to the Main Post and the reduced amount of surfaced roadways within the Main Post, it is easy to imagine the chaos of frustrated drivers of cars, vans, delivery trucks and tourist buses, circling about the Main Post in the revolving hunt for a vacant parking space.

According to the SDSEIS, the Preferred Alternative projects that the parking and traffic congestion will intensify to the point where various intersections within and outside of the Presidio will erode to a grade "F" condition, that is, "F" as in failure. Even though traffic lights are anathema to other National Parks, the Trust's "Update" documents show projections that will require traffic controls, including traffic lights, at numerous locations within the Presidio and in San Francisco. The Trust's parking and traffic plan is a vivid demonstration of its effort to force a project into a space where it clearly does not belong.

Prior to proceeding with a planning document specific to the Main Post, the Trust should conduct a comprehensive parking and traffic analysis of the entire Presidio. It is not possible to accurately evaluate the cumulative impacts related to the development of the Main Post in the absence of such an analysis. The analysis performed to date clearly is inadequate for these purposes. A Presidio-wide parking and traffic analysis should include consideration of (a) a more realistic projection of the number of visitors to the Main Post; (b) removing parking lots and parking facilities from the center of the Presidio to its perimeter in a manner consistent with NPS policy; (c) conducting comprehensive peak period (both for weekdays and weekends) and seasonal visitation and traffic analysis; (d) utilizing more realistic projections regarding transit support from the SFMTA; and (e) utilizing more realistic projections for parking fees to deter traffic, including the Presidio's relatively isolated location and its limited potential for significant expansion of public transit between the Presidio and San Francisco.

4. The Amount of New Construction Under the Preferred Alternative Totals Nearly 450,000 Square Feet, Is Excessive By Any Standard, And Will Have a Significant Adverse Impact on the Main Post.

The Preferred Alternative incorrectly states that the Preferred Alternative will require 228,000 sq. ft. of new construction on the Main Post, in addition to the 25,000 sq. ft. of new construction that has been built or authorized since the 2002 PTMP, for a total acknowledged

amount of new construction of 253,000 sq. ft. (New Update, p. 47, Table 3) However, the actual amount of new construction would be nearly 450,000 sq. ft., by inclusion of the three additional sources of new construction described below.

First, there will be at least an additional 170,000 sq. ft. for the three proposed underground parking structures (35,000 sq. ft. for the relocated CAMP garage (100 spaces); 30,000 sq. ft. for the Lodge garage (65 spaces) and 105,000 sq. ft. for the North Bluff garage (300 spaces).¹ This new construction raises the Trust's total square footage from 253,000 by 170,000, for a total of 423,000 sq. ft.

Second, there will be at least 20,000 sq. ft. of new construction resulting from CAMP's three sunken courtyards ("rooms without ceilings"), its partially glassed-in walkways beneath the overhanging roof ("rooms with partial walls"), its café plaza, and its underground hallways. The New Update does not provide specific dimensions for this construction; however, a conservative estimate of these additions is 20,000 sq. ft., based on the concept drawing at page 47 of the New Update, and the dimensions at page 31 of the original Main Post DSEIS. This would increase the total new construction on the Main Post to approximately 443,000 sq. ft.

Third, the total should also include the large building without walls proposed to be constructed on the Main Parade in front of the Lodge, described in item 2 above. While dimensions for this structure are not provided in the New Update, Trust drawings suggest it will be approximately 5,000 sq. ft. Thus, the grand total of the new construction on the Main Post would be approximately 448,000 sq. ft. In contrast, the Preferred Alternative proposes to demolish 82,510 sq. ft. of usable existing buildings, a ratio of over 5:1. (New Update, p. 47) The amount of new construction is grossly excessive, and similarly violates the one up, one down planning standard. Even if the Trust were to lump everything together within the Main Post district, it still would grossly violate the standard.

NAPP submits that there can be no justification for such a large amount of new construction at the Main Post under any standard, whether under NEPA, the NHPA, Section 104 of the Trust's enabling legislation or just plain common sense.

5. The Preferred Alternative's Placement of the Heritage Center/Museum Is An Affront to the Trust's Responsibilities Under the Presidio Trust Act Section 101.

Under Section 101, the Trust is charged with the responsibility to "preserve and protect the cultural and historic integrity of the Presidio for public use, or recognize its significant role in the history of the United States." NAPP submits that scattering the heritage center about the Officers Club to share space with traveling art and craft exhibits falls notably short of fulfilling this important responsibility. The New Update and the SDSEIS essentially propose to treat the Heritage Center, not as a museum, but more of a visitors center and the site of

¹ The 105,000 sq. ft. for the 300 space garage projected as three times the size of the 35,000 sq. ft. for the 100 space CAMP-annex garage. While the New Update and the SDSEIS hedge in their commitment to building the three garage facilities, describing them as being "optional" based on parking demand, it is noted that the Preferred Alternative relies on the existing of all 465 garage parking spaces to obtain its total of 2,155 parking spaces in seeking Trust approval and passing environmental and historic review scrutiny. If the Trust is not relying on these garages, then it should not have included them as key elements of its parking solution. NAPP suggests the Trust cannot have it both ways.

special events and public programs. Instead, the Presidio's heritage museum is described as a "museum without walls", much of which will be a walking route past the 448,000 sq. ft. of Main Post new construction. It is ironic that the Trust does not recognize a building with a substantial roof but no walls or one with substantial walls but no ceiling as new construction, but fully endorses the concept of a heritage museum that has no walls or ceilings. (New Update, pp. 29 - 31; SDSEIS, pp 6, 12 & 13).

6. The Main Post Process Has Been Fatally Flawed From Start to Finish.

The entire process of the "Main Post Update" has been flawed from the outset by forcing a pre-designated result through the NEPA pipeline, attempting to patch holes as the process evolves, forsaking the considered planning process that resulted in the Presidio's master plan, its 2002 PTMP. The characterization by the Trust that the Preferred Alternative is merely an "update" of the PTMP is a misnomer. The Preferred Alternative essentially re-writes the PTMP, rather than update it; it constitutes a broad scale change in the use and the future character of the Presidio's Main Post. NAPP urges the Trust to abandon this failed effort and start fresh with a process that truly considers park values and the concepts contained in NAPP's proposed alternative presented in our October 25, 2008 letter.

Thank you for your consideration of our input on this critically important matter.

Sincerely,

Judith Hulka
NAPP President

cc:

Speaker Nancy Pelosi
Senator Dianne Feinstein
Senator Barbara Boxer
Mayor Gavin Newsom
San Francisco Board of Supervisors
Frank Dean, Interim 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
Anthea M. Hartig, National Trust For Historic Preservation
Elaine Jackson-Retondo, National Park Service