

Letter 11

STATE OF CALIFORNIA - BUSINESS, TRANSPORTATION AND HOUSING AGENCY

GRAY DAVIS, Governor

DEPARTMENT OF TRANSPORTATION

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June 7, 1999

The NEPA Compliance Coordinator
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, Ca 94129-0052



SF-101-6.71
File No. SF101102

Draft Environmental Impact Statement (DEIS) and Planning Guidelines for the Letterman Complex; The Presidio Trust; City and County of San Francisco

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the proposed Letterman Complex project at the Presidio in the City and County of San Francisco. We have examined the above-referenced document and have the following comments to submit:

- 1. It appears that the Letterman Complex project at the Presidio would involve potential improvements within the State Highway 101 right-of-way (ROW). We, therefore, request that the City submit either a Permit Engineering Evaluation Report (PEER) if the proposed project improvements within the State ROW cost less than \$1 million, or a combined (PSR/PR) for project improvements costing over \$1 million. 11-1

- 2. Caltrans has serious concerns about potential project traffic impacts to Highway 101 at Doyle Drive, Richardson Avenue and Lombard Street. Further, proposed improvements to Highway 101 raise the following traffic operations and safety issues that should be addressed: 11-2
 - (a) The proposed reconfiguration of the new signalized intersection of Lyon/Street/Richardson Avenue/Gorgas Avenue would allow left turns into and out of the Letterman Complex. This would reduce the capacity on Richardson Avenue from three lanes to two lanes in both directions. As a result, traffic in the southbound direction would likely queue up in the AM peak period. The queue would extend back onto Doyle Drive blocking the mainline traffic. The traffic in the northbound direction is likely to queue up during the PM peak period. The queue would extend back to the intersection upstream of the proposed new intersection.



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(b) The proposed new signalized intersection at Richardson Avenue/Gorgas Avenue would allow left turns from Gorgas Avenue to northbound Richardson Avenue. The left turns would require stopping southbound traffic from Doyle Drive to Richardson Avenue. This would result in a queuing effect on traffic on Doyle Drive. The queuing may end in the vicinity of the connector from Doyle Drive to Richardson Avenue where sight distance is limited and high-speed freeway traffic is unaccustomed to stopping.

11-3

Finally, please be aware that all activities that involve a need to perform work or implement traffic control measures within the State right-of-way (ROW), will require a Caltrans encroachment permit. To apply for an encroachment permit all applicants are required to submit a completed application with appropriate environmental documentation and five (5) sets of plans (in metric units) which also show State ROW to the following address:

11-4

G. J. Battaglini, District Office Chief
Office of Permits
Caltrans, District 04
P. O. Box 23660
Oakland, Ca 94623-0660

We thank you for the opportunity to work with you on this project. Should you require further information or have any questions regarding this letter, please call Nandini N. Shridhar, AICP, of my staff at (510) 622-1642.

Sincerely,

HARRY Y. YAHATA
District Director

By *Jean C. R. Finney*

JEAN C. R. FINNEY
District Branch Chief
IGR/CEQA



Responses to Comments in Letter 11

11-1

Because costs for project improvements are expected to exceed \$1 million, the Presidio Trust will submit a combined PSR/PR for review and approval by Caltrans.

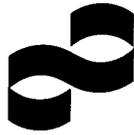
11-2 AND 11-3

See master response 18.

11-4

Upon development of plans for the intersection, and if required, the Presidio Trust would apply for a Caltrans encroachment permit or other necessary permits.

Letter 12



GOLDEN GATE BRIDGE, HIGHWAY AND TRANSPORTATION DISTRICT

June 11, 1999



NEPA Compliance Coordinator
Letterman Complex
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

To Whom It May Concern:

Re: Draft Environmental Impact Statement (DEIS) for New Development and Uses within the Letterman Complex/A Supplement to the 1994 General Management Plan Amendment for the Presidio of San Francisco, San Francisco, California

Golden Gate Bridge, Highway and Transportation District (District) has reviewed the above referenced document and provides the following comments as they pertain to impacts on the Golden Gate Corridor and Golden Gate Transit. District did not review the "Presidio Letterman Complex Transportation Technical Report" (by Wilbur Smith Associates) and recognizes that some of the following comments may be addressed in that document.

GOLDEN GATE CORRIDOR IMPACTS

U.S. Highway 101 is the principal route between San Francisco and the North Bay. Along this route, District operates the Golden Gate Bridge and Doyle Drive. As such, District is concerned with any proposal that may potentially affect traffic and transbay bus operations on the Golden Gate Bridge, Doyle Drive, Richardson Avenue, or Lombard Street.

1. DEIS states the primary vehicular entrance to the Letterman Complex will be either the "Lombard Street Gate" (intersection of Lombard and Lyon streets) or a reconfigured "Gorgas Avenue Gate" (intersection of Gorgas and Richardson avenues). DEIS (page 94) estimates between 220 and 650 afternoon peak hour vehicle trips for Alternatives 1 through 6.

Despite the project site's vicinity to U.S. Highway 101, DEIS has limited its evaluation of traffic impacts to seven or eight intersections "nearest the Letterman Complex." Specifically, DEIS evaluates only one intersection (i.e., Lyon/Richardson/Gorgas) along U.S. Highway 101.

It would be informative if the DEIS addressed traffic impacts along U.S. Highway 101 (i.e., Golden Gate Bridge, Doyle Drive, and key intersections on Lombard Street) resulting from the proposed alternatives.

12-1



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- | | | |
|---|---|------|
| 2. In general, morning peak hour traffic volumes typically are more pronounced than afternoon peak hour volumes. Can the afternoon peak hour evaluation be extrapolated to estimate what traffic impacts might be expected during the morning peak hour? | } | 12-2 |
| 3. DEIS presents existing (Table 4, page 66) and projected (Table 16, page 96) traffic levels-of-service (in terms of delay) for the six project alternatives, for eight intersections. Since "existing" traffic volume-to-capacity ratios are not presented in Table 4, it is not possible to ascertain the change in volume-to-capacity ratios at these intersections by the project alternatives. | } | 12-3 |
| 4. DEIS states (page 83) traffic "impacts would be avoided by implementing intersection improvements at 3 locations." Comparing "existing" with "2010 weekday" traffic delays in Tables 4 and 16 (pages 66 and 96, respectively), it appears delay at the Richardson/Francisco intersection would increase from 9.2 seconds/vehicle to 31.0 seconds/vehicle for Alternative 1. How has this impact been mitigated in the DEIS? Under the "2010 weekday" conditions, is it reasonable to assume this intersection will experience an average delay of 33 seconds/vehicle while virtually operating at capacity (i.e., volume-to-capacity ratio of 0.99)? | } | 12-4 |
| 5. DEIS projects (page 93) approximately 17 percent of (home-to-work) trips to the project site will be from the North Bay. Alternative 5 calls for a "Digital Arts Center". Since several of the employers associated with this alternative are presently located in San Rafael, is it realistic to assume all North Bay home-to-work trips to the project site will be at a consistent 17 percent level among the six project alternatives? | } | 12-5 |
| 6. Table D-6 (page D-7) shows 14 percent and 24 percent of employee/visitor trips from the North Bay and East Bay, respectively. Considering U.S. Highway 101 freeway accessibility of the project site, what proportion of East Bay vehicular trips can be anticipated to access the Letterman Complex via the Richmond-San Rafael and Golden Gate bridges? | } | 12-6 |
| 7. Table D-7 (page D-7) indicates the majority of the Letterman Complex traffic will access the Presidio via the Gorgas Gate. How many of these trips will be on Doyle Drive? How many will be on the Golden Gate Bridge? | } | 12-7 |
| 8. Alternatives 1 through 5 propose reconfiguration of the existing Lyon/Francisco/Richardson intersection, and create two new signalized intersections on Richardson Avenue. Figure 14 (page 109) appears to indicate two northbound through lanes at the "New Letterman/Exploratorium" signalized intersection and three northbound lanes (i.e., one left turn, one through, one right turn lane) at the "New Gorgas/Richardson" signalized intersection. Is this interpretation correct? What are projected levels-of-service for the new intersections during morning and afternoon peak hours? | } | 12-8 |
| 9. DEIS states (page 108) that Alternative 6 "would not include any changes to intersections or roadways in the area." However, Figures 10 and 11 (pages 44 and 50, respectively) illustrating "Alternative 6" and "Existing Conditions" both indicate alignment changes to Lyon/Francisco/Richardson and Lyon/Gorgas/Richardson intersections. What changes, if | } | 12-9 |



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any, are anticipated for Alternative 6? What are the projected levels-of-service for these intersections during morning and afternoon peak hours? 12-9

10. DEIS states (page 36) "Presidio Trust would coordinate with the development team responsible for implementing improvements...to reconfigure the (Lyon Street, Richardson Avenue, Gorgas Avenue) intersection." Given potential impacts along U.S. Highway 101 and to Golden Gate Transit (GGT) bus service, District requests to be consulted during coordination efforts. 12-10

11. Given average travel speeds on Doyle Drive and the potential limited sight distance created by "New Letterman/Exploratorium" signalized intersection for southbound motorists, have appropriate considerations been given to traffic safety on Doyle Drive? 12-11

GOLDEN GATE TRANSIT IMPACTS

Golden Gate Transit serves the Letterman Complex at the existing coach stop located at the Richardson Avenue and Francisco Street intersection. This stop is shared with San Francisco Municipal Railway (Muni) routes 28, 76 and 91, and Golden Gate Club Bus service to Sonoma Valley (see below). Southbound Richardson Avenue stop, located between Francisco and Lyon streets, is 76 feet in length. Northbound Richardson Avenue stop, located between Francisco and Baker streets, is 112 feet in length. The northbound stop is a major internal transfer point on the GGT network permitting patrons to transfer between Financial District and Civic Center routes. Both stops have shelters. 12-12

12. Figures 13 and B-24 (pages 65 and B-46) do not correctly reflect above bus stop locations on Richardson Avenue.

13. DEIS (page 94) estimates from 590 to 1,710 new daily transit trips, and 60 to 200 new afternoon peak hour transit trips for Alternatives 1 through 6. DEIS assumes all transit trips to be accommodated on six Muni bus routes. By claiming the "maximum load points on (these) Muni lines" are "far away and opposite to the Presidio commute direction," DEIS thereby concludes these Muni routes have "existing capacity available to accommodate transit passengers." 12-13

District would appreciate DEIS identifying potential impacts to GGT operations, in light of the following issues. These issues include: projected proportion of trips between the North Bay and the project site (approximately 17 percent, as stated on page 93); potential relocation of office workers from Marin County (for some alternatives) to the Letterman Complex; extensive service provided by GGT along U.S. Highway 101; and, the immediate vicinity of the project site to the existing GGT bus stop at Richardson Avenue and Francisco Street.

14. DEIS correctly states (page 110) that a criteria to assess the degree of transportation impacts includes "whether the alternative would exceed existing transit capacity." Given this DEIS criteria and GGT's "maximum load point" to be approximately at the toll plaza of the Golden Gate Bridge for transbay bus service (during morning and afternoon peak periods), an increase in passengers to the Presidio could be a significant impact for GGT. 12-14



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As you may know, bus ridership is not evenly distributed among all GGT bus trips. Therefore, even a small increase in passengers may generate additional standees and could be a significant impact from an operational perspective. An impact assessment requires distribution of new transit riders over existing GGT bus routes or trips. District is prepared to facilitate this analysis by providing current bus loading information.

12-
14

15. No mention is made of Golden Gate Club Bus service to and from the Sonoma Valley under "Public Transportation" section of the DEIS (page 60). Club Bus is a subscription transit service. District provides financial assistance to Club Bus services across the Golden Gate Corridor. Currently, there are three Club Bus trips from the Sonoma Valley to San Francisco's Financial District and Civic Center. These buses operate during the weekday peak period and serve the project site at the existing Richardson Avenue and Francisco Street bus stop.

12-
15

16. DEIS presents schematic street layouts (Figures 5 through 10, pages 19 through 44) for each Alternative. Each figure shows a reconfigured layout of the Lyon/Francisco/Richardson intersection. Each figure should also indicate the recommended location of coach stops on Richardson Avenue.

12-
16

17. Figure 14 (page 109) illustrates cut outs for Richardson Avenue coach stops. DEIS claims these cut outs will be incorporated as part of Alternatives 1 through 5. Can they also be incorporated into Alternative 6? How many linear feet will be provided? What passenger amenities are to be provided?

12-
17

Thank you for the opportunity to comment on this Draft Environmental Impact Statement. Please call Principal Planner Mr. Maurice Palumbo at (415) 257-4431 if you have questions.

Very truly yours,



Jerome M. Kuykendall
Director of Planning
and Policy Analysis

JMK:ke
c: Celia G. Kupersmith
Wayne T. Diggs
Maurice P. Palumbo
a:c:\msword\bus\letterman.deis.069



Responses to Comments in Letter 12

1 2 - 1

The intersection at Richardson Avenue and Lyon/Francisco streets is the only intersection that would be significantly affected by any of the proposed alternatives. However, in response to the comment, additional analysis was conducted to estimate forecast project-related traffic increases on the Golden Gate Bridge:

TIME PERIOD	TRAFFIC DUE TO ALT. 5	GG BRIDGE TRAFFIC	% INCREASE
p.m. Peak Hour	57	8,700	0.7
Daily	612	117,000	0.5

The above table was developed using traffic from the preferred alternative and indicates that any increases on the bridge would be very small and not have a significant impact on bridge traffic and congestion. In addition, the traffic above and in the Draft EIS does not factor in any reduction in traffic from San Francisco to Marin County (where the preferred alternative proponent is currently located) and so overstates the overall impact and is therefore conservative.

1 2 - 2

Traffic counts conducted in January 1999 indicate that the p.m. peak-hour traffic volumes were higher than a.m. peak-hour traffic volumes. Capacity analyses were conducted for each of the five study intersections, and it was found that the average delay per vehicle was generally greater during the p.m. peak hour. Thus, after the p.m. peak hour was determined to be the more critical of the two commute time periods, the capacity analyses were carried forward for the p.m. peak hour only.

In particular locations where it was determined that a.m. peak-hour conditions would be the more critical of the two scenarios, the capacity analyses was conducted for the a.m. peak hour as well. This was true for the new intersection(s) proposed on Richardson Avenue. With an a.m. peak-hour southbound traffic flow that would be unregulated by upstream intersections, the conflict between the northbound left-turn movement into the Presidio and the southbound through movement was apparent.

In general, signalized intersections distribute the green light time proportionally to the volumes on each approach, which in effect balances the delay for each vehicle on each approach. However, in some instances the delay per vehicle on the minor approaches to an intersection will be higher than for those vehicles on the major approaches to the intersection. At the new intersections on Richardson Avenue, the delays for the minor approaches would not be substantially higher than for the major approaches, because the times allowed for pedestrians to cross Richardson Avenue are more critical than the time needed for the vehicular traffic on the minor approaches.

1 2 - 3

In response to the comment, Table 4 has been revised to include critical volume-to-capacity ratios.



1 2 - 4

The increase in delay from 9.2 seconds per vehicle to 31.0 seconds per vehicle would not be considered significant. At intersections for which traffic volume is largely comprised of commute traffic, such as intersections on Richardson Avenue, it is not uncommon to experience volumes that are very near capacity. Commute traffic typically has characteristics that yield effective traffic flow, such as drivers that are familiar with the roadway and higher density of vehicles. Volumes that are very near capacity but with high flow rates indicate that traffic is moving through the intersection efficiently.

1 2 - 5

The information on the geographic distribution of trips was obtained from recent surveys at the Presidio, and consistently applied to all alternatives. This average distribution is appropriate for use where detailed information on the actual distribution is not available. While some variations in origins and destinations are likely between the alternatives, on average, the use of these assumptions will result in similar analysis results. Based on discussions with the proponent of the Digital Arts Center alternative on anticipated travel characteristics of their employees at the Letterman Complex, the actual geographic distribution is not expected to be different than that analyzed in the EIS.

1 2 - 6

Some of those traveling between the site and northern cities in the East Bay may use the Richmond-San Rafael and Golden Gate bridges. However, due to the small number of vehicle trips estimated to originate or end in these areas, the EIS traffic assignment did not assume that any vehicle trips would travel between the site and the East Bay via the Richmond-San Rafael and Golden Gate bridges. The East Bay traffic entering the Gorgas Avenue Gate was assumed to turn left from northbound Richardson Avenue into the site, and traffic leaving the Gorgas Avenue Gate was assumed to turn right onto southbound Richardson Avenue. This traffic was assigned in this way in order to allow a conservative analysis of the proposed new intersections on Richardson Avenue. Because the conflict between the northbound traffic turning left into the site and the southbound through traffic on Richardson Avenue is the critical conflict of the intersection's operation, it was important not to underestimate the magnitude of this conflict.

1 2 - 7

Of the 260 project-generated vehicles entering or exiting the Gorgas Avenue Gate during the p.m. peak hour, 19 would be traveling southbound on Doyle Drive to the gate and 54 would be traveling northbound on Richardson Avenue and Doyle Drive from the gate during the p.m. peak hour. Of these vehicles, an estimated 13 and 44 would be traveling to and from the North Bay via the Golden Gate Bridge, respectively. The remainder would travel to and from Park Presidio Boulevard through its interchange with Doyle Drive.

1 2 - 8

Figure 14 of the EIS is intended to represent available turning movements at the proposed new intersections, but does not reflect the number of lanes assigned to each of these movements. In response to the comment, Figure 14 has been revised to indicate the number of lanes. The projected levels of service for these two intersections during the p.m. peak hour are indicated in Table 18 of the EIS.



1 2 - 9

Figures 9 and 10 incorrectly depicted the proposed intersection geometry for Alternative 6 and Existing Conditions. In response to the comment, these figures have been corrected to illustrate the roadway geometry that exists today. The discussion on page 108 to which the commentor refers is correct. Alternative 6 would not include any changes to intersections or roadways in the area. The projected levels of service for the intersection(s) on Richardson Avenue in the year 2010 are indicated in Table 18 of the EIS.

1 2 - 1 0

The Presidio Trust will prepare a project study report (PSR) for Caltrans on proposed intersection configurations (see master response 18). During this process, the Presidio Trust would coordinate with the agency to keep it informed of key meetings and any issues that affect bus service and stops.

1 2 - 1 1

Refer to master response 18.

1 2 - 1 2

In response to the comment, Figures 12 and B-24 have been revised to reflect the current bus stop locations.

1 2 - 1 3

The project's ridership impacts to Golden Gate Transit are summarized in the response to comment 12-14. In response to the comment, new text has been added to the Final EIS which provides an analysis of the impact on Golden Gate Transit's "maximum load point."

With regard to the potential relocation of office workers from Marin County, see the response to comment 12-5.

The proposed new intersections on Richardson Avenue would likely cause Golden Gate Transit buses traveling through these intersections to incur slightly more delay than they do currently.

With the proposed new intersections on Richardson Avenue, the bus stop located at the intersection of Richardson Avenue and Francisco Street would be relocated northward to a location near the Exploratorium, as shown in Figure 15 of the Final EIS.

1 2 - 1 4

The average passenger load on Golden Gate Transit transbay buses during the a.m. and p.m. peak hours is about 30 passengers per bus, and there are about 120 buses per hour during the a.m. peak hour and about 110 buses per hour during the p.m. peak hour for about 23 different transbay routes. The six alternatives would generate between 9 and 26 transit trips to the North Bay in the p.m. peak hour. If these project-generated passengers were distributed across the 23 Golden Gate Transit routes proportionally to the existing distribution of passengers across routes, the project would add a maximum of three passengers to each route. Even if all of the passengers added to a single route were on the same bus, the estimated passenger load would not exceed the bus capacity for any one line.

1 2 - 1 5

In response to the comment, a description of the Club Bus service has been added to the end of Section 3.9.3, Public Transportation, within the Final EIS.

1 2 - 1 6

In response to the comment, these figures have been revised to indicate proposed locations of bus stops.

1 2 - 1 7

The coaches stop “cut-outs” depicted in Figure 15 are part of the proposed intersection improvements for Alternatives 1-5. Since Alternative 6 would include minimal site improvements, the current bus stops would not be changed. The number of linear feet and passenger amenities would be determined through consultation with Golden Gate Transit during preparation of the PSR.

Letter 13

Thoreau Center
Partners, L.P.

June 9, 1999

NEPA Compliance Coordinator
Attention: Letterman Complex
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052



RE: Comments on Draft Environmental Statements for New Development and uses within the Letterman Complex/A Supplement to the 1994 General Plan Amendment EIS for the Presidio

Dear Sirs and Madams:

The purpose of this letter is to identify and put on record the Thoreau Center Partners' concerns related to the proposals for redevelopment of the Letterman-Lair Complex, now under consideration by The Presidio Trust. We have focused our review of the draft EIS to planning, urban design, environmental, and transportation issues as they directly affect the operation and program mandate of the Thoreau Center for Sustainability, which is the adjacent and most immediate neighbor to the proposed project. Our comments also consider the impact of the proposed projects on the Presidio, in general, as envisioned in the General Plan Amendment.

The Thoreau Center for Sustainability is currently the Presidio's largest multi-tenant project, serving as the home to over 50 non-profit organizations and several businesses. The Thoreau Center was created in order to foster a community of non-profit organizations dedicated to realizing the programmatic vision of the General Management Plan. The Thoreau Center represents a \$13 million private sector investment in the Park and has become a model for historic rehabilitation and sustainable development throughout the United States.

We welcome a new neighbor on the Letterman-Lair Complex site and look forward to working with The Presidio Trust and the selected tenant on the future redevelopment of the area. However, it is imperative at this time that we ensure that the project will not adversely affect our ability to operate the Thoreau Center. We need to be able to represent to our tenants and lenders that the Thoreau Center will continue to be an historic landmark set in an historic district, with minimal impacts from redevelopment and increased parking and traffic.

The following list of concerns is based on our review of the draft EIS and attendance at several public meetings. We request that, as a neighbor and Park Partner, we continue to be kept informed about the project and reserve the right to continued involvement in the planning process.

244 California Street, Suite 400, San Francisco, CA 94111 (415) 263-1750 Fax (415) 263-1759



Thoreau Center

The draft EIS is a reasonable statement of potential impacts, but it does not go far enough in analyzing either the parking or traffic issues. Further, we have significant concerns about the functionality of the proposed traffic mitigation measures.

A. Evaluation of Parking

The degree to which the Letterman proposals will satisfy their parking demand is crucial to the Thoreau Center because parking will become extremely limited in the area, once the project is completed. If the selected Letterman Complex proposal does not accommodate its internal parking demand, the overflow will affect parking available to the Thoreau Center.

The draft EIS indicates that the Shorenstein proposal would provide 1,390 parking spaces, while the demand would be for 1,200. The document indicates that the Lucas proposal would provide 1,530 spaces while demand would be for 1,260. These computations indicate that sufficient parking would be provided by both proposals. However, we believe that additional work should be done by the eventual project sponsor to confirm these estimates. The estimates in the draft EIS were performed in accordance with the “San Francisco Guidelines for Environmental Review”, as is required for all projects undergoing an environmental review in San Francisco. Those guidelines are based on generic development types, and many varying types of development are aggregated into land use categories, each with their own prescribed trip generation and parking rates. Both the Shorenstein and Lucas proposals are very specific proposals, and data is available that would allow a better estimate to be made of both trip generation and parking. In particular, if the Lucas project operates with a scenario where major filming projects are worked on with a high level of intensity and long hours over a concentrated period, there could be spikes in the parking demand that exceed the averages used in the draft EIS analysis.

13-1

We believe that a parking demand analysis more closely tied to the known and expected uses in each specific proposal would produce a higher level of confidence that the parking demands will in reality be satisfied by the proposal supply. Such an analysis should be carried out as part of the Final EIS.

The project should not start construction until the approval of a detailed parking management plan. Such a plan would establish the parking areas that The Thoreau Center currently depend on as being allocated specifically for the Center’s use.

Parking management plans accompanied by significant improvement in public transit alternatives for employees and visitors to the new Letterman-Lair Complex project will need to be more detailed before we can fully understand the potential impact of the proposed project on the Thoreau Center and other surrounding Park Partners. We intend to work closely with the Trust and the selected developer on the plans and the development of enforceable provisions in the lease that restrict parking



Thoreau Center

to the project site and mitigate use of adjacent areas, including Thoreau, for visitor parking. 13-1

B. Evaluation of Traffic Issues – Access and Major Arterias

The major issue for the Letterman proposal, for the Thoreau Center, and for the Presidio as a whole is access. Access to the Presidio is tightly constrained, and both the Shoreinstein and Lucas proposals will add a significant level of traffic. The possible effect on the Thoreau Center is that if the access is not sufficiently well designed for the Presidio as a whole and for the Letterman project as one of its principal generators, that patrons of the Thoreau Center will have difficulty getting in and out of the site. In the following paragraphs, we comment on the work performed in the draft EIS, other ongoing work in the vicinity regarding Doyle Drive, and a general comment on the nature of access to the Presidio. 13-2

The draft EIS has recognized this access issue and includes two principal proposed improvements for access to the site. One proposal would be to install a traffic signal at Lombard and Lyons Streets and to restripe the Lombard Gate entrance to provide for an additional left turn lane leaving the Presidio: Figure 15 on Page 112 of the draft EIS documents this proposal. The second mitigation would be a major redesign of the Gorgas gate entrance, creating a second intersection to serve traffic to and from the ramps leading to and from Doyle Drive. Figure 14 on Page 109 documents this proposal.

Lombard Gate

Of the proposal to widen the Lombard gate, we are concerned that it will not work as efficiently as implied by the results of the draft EIS. The 33 foot width is not sufficient space in which to fit three lanes in two directions. Some of the large vehicles entering the Presidio are virtually certain to strike the historic Gate Columns. Further, the proposed length of the left turn lane, approximately 30 feet, is not sufficiently long enough for the turning movements currently observed, and therefore not long enough for the projected volumes in the future. 13-3

Gorgas Gate

With regard to the more complex Gorgas Gate, the Wilbur Smith team is to be commended for developing a creative solution to this complex problem. However, we believe the analysis falls far short of determining whether the proposed solution will actually be able to function effectively. The analysis goes only far enough to determine that the creation of the added intersection would produce acceptable levels of service at both of the proposed Gorgas Gate intersections. However, these two Richardson Avenue intersections are very close to intersections on Gorgas Avenue. The interface between the Richardson Avenue intersections and the Gorgas Avenue intersections has not been analyzed to determine if there is sufficient storage 13-4



Thoreau Center

space, how the controls would be established on the internal roadways, and how access between the two proposals and these two intersections would work. We believe that this entire area should be analyzed as a system rather than as two separate intersections.

13-4

We also have these additional concerns about the feasibility of the Gorgas entrances:

1. We are concerned about the proximity of the new, northern intersection to be created on Richardson Avenue with respect to speeds of traffic coming off of the Doyle Drive/Bay Street Interchange. Traffic levels approach 45-55 mph in the location proposed for the new intersection. We are concerned about safe stopping distance and the potential for rear-end accidents if the interchange is retained in its current configuration.

13-5

2. The proposed new intersection is intended to have an access-way that passes between two existing buildings in the Presidio. While not a fatal flaw, we are concerned about a slight difference in grade between Richardson Drive and the existing passageway. We are also not certain that the passageway is sufficiently wide enough to provide for two traffic lanes and continue to provide existing pedestrian access to the two buildings; both buildings currently have doorways that lead to this passageway.

13-6

3. Any modification to Richardson Avenue will require the approval of Caltrans, since this roadway is designated as US 101, a State Highway. It is not clear that this approval will be obtained simply through the draft EIS process. If Caltrans approval is not obtained, significant congestion could be anticipated for all vehicles attempting to enter and leave the Presidio at this location, and some congestion could be expected to spread to other points as well.

13-7

The two alternatives have somewhat different internal roadway systems, and it is crucial to the feasibility of the proposals for the Gorgas entrance that each proposal be analyzed separately with regard to the "Master" proposal for Richardson Avenue. This has not been done. We are concerned that Shorenstein proposal includes a proposal for a very severely angled approach of an internal roadway to the extension of the roadway for the new intersection. Access to the Thoreau Center would probably use this roadway for much of its access. We would expect sight distance problems to possibly occur at the intersection of Gorgas and this new roadway. The Shoresntein proposal leaves untouched the complex Gorgas/Lyon/Richarson intersection, which is handled better by the Lucas proposal; this is a fine-scale detail that should be worked out as the project evolves.

13-8

The Lucas proposal appears to have very limited entrance/exit capacity, particularly from the Gorgas gate. Any congestion at this entrance-point would impact users of Thoreau Center and other users of the Presidio. The Lucas proposal also cuts



Thoreau Center

O'Reilly Street off from Gorgas Avenue, meaning that people currently parking on O'Reilly and using the Thoreau Center would have a circuitous means of access and egress. Given the constraints on the Presidio's circulation system, alternative means of access and egress from Gorgas need to be provided. 13-8

C. Evaluation of Traffic Issues - Local Street System within the Letterman Complex

We are particularly concerned with the treatment of the historic roadway that forms the boundary between the Letterman Complex and the historic Letterman Hospital, (now the Thoreau Center). These concerns are presented below:

1. Torney Avenue should remain a minor one-way local street with no intersections or vehicle connections (including transit) to other streets within the new Letterman Project Area. Torney runs right next to the historic Letterman Buildings 1012-1014 (now the entrances to Tides and the Energy Foundation) and Building 1000. In fact, it is physically adjacent to the edge of these buildings. Any increase in traffic on this road will create a significant hazard to pedestrians accessing these buildings and will negatively impact current uses of the buildings. Any changes to the configuration of the roadway will significantly affect the historic landscape and character of these pavilion style buildings set in a park-like landscape. 13-9

2. O'Reilly Street should remain a minor one way street in the Presidio grid system. This local street provides access to the entrances of Buildings 1000-1004, and is the location for the required non-exclusive parking for these buildings. Historically it has always been a narrow "residential" street. It should not become a collector or access street to new streets within the Letterman Complex Project Area. It also should not provide access to parking within the Letterman Complex Project Area, or serve as a drop-off, pick-up, or service to either residential or office complexes in the Letterman Project Area. 13-10

3. General Kennedy Avenue should remain a minor one-way couplet with no widening or increase in traffic. It is an important roadway for emergency vehicle access to Buildings 1000-1004 and 1007-1009. The east side of the couplet provides required non-exclusive parking spaces for Buildings 1000-1004. In addition, any increase in traffic would create a pedestrian hazard, due to the high historic hedges adjacent to the roadway that block visibility to the street. We were required to preserve these hedges as part of the cultural landscape. An increase in traffic would create a division between the O'Reilly Street houses and the Thoreau Center, losing the cohesive character of the historic complex. 13-11



Thoreau Center

D. Evaluation of Planning and Urban Design Issues

1. Setbacks along O'Reilly should be a minimum of 50 feet, in order to minimize the impact on the historic character of this street and Buildings 1000-1004. Massing should be minimized from the set back line by stepping back from 2 to 3 floor elevations in order to maintain the character of the existing streetscape on O'Reilly, which is historically a 2- 3 story neighborhood of wood frame houses. The massing of the Shoresntein proposal along O'Reilly Street is certainly more respectful on the historic officers' houses than the Lucas proposal. The massing of the 5-story buildings in the Lucas proposal completely negate the historic character of O'Reilly Street.

13-
12

2. The massing and building wall along O'Reilly should allow for views and pedestrian access through the site to major open spaces in the Letterman Complex Project site. In all cases, the buildings should be designed to allow for easy pedestrian circulation between the Thoreau Center's public spaces and circulation system and the major public spaces in the new Letterman Complex.

13-
13

E. Environmental Issues

1. Demolition and deconstruction of the existing Letterman-Lair Complex needs to be tightly contained and monitored. We look forward to reviewing detailed conditions in the final lease documents regarding restricted hours for demolition and excavation activities, truck circulation and access, the location of staging areas, location of construction employee parking, and general issues related to construction activities. No truck access should be permitted on or along O'Reilly Street, General Kennedy and Torney Avenues. These streets are too narrow and the turning radii are too tight to allow them to be used for construction level activities. In addition, there are numerous alternative approaches to the Letterman Complex Project site. We also expect that construction employee parking will be restricted to the Letterman Complex Project site.

13-
14

2. We know from our own operating experience in the Presidio that it is critical to develop a direct and efficient link between the Presidio and BART. This particular linkage is not well addressed by the proposals. While there are potential linkages with the use of Golden Gate Transit, we believe that the best and most viable linkage will be with shuttles that leave directly from the new Letterman Complex project. Thoreau Center Partners is interested in participating in any program that will minimize the use of the private automobile in this area of the Presidio.

13-
15



Thoreau Center

F. Compliance with the General Plan Amendment

The Draft EIS outlines a number of potential patterns of use for the Letterman Complex. Our final comment is that any project chosen must comply with the programmatic vision and uses outlined in the General Plan Amendment. Such Compliance needs to be detailed in final lease documents for the project.

13-
16

Thank you for this opportunity to put on record our concerns.

Sincerely,


Tom Sargent
Managing General Partner


Drummond Pike
President, Tides Foundation



Responses to Comments in Letter 13

1 3 - 1

Regarding parking supply/demand calculations, see master response 20. In response to a second point in the comment, the preferred alternative is for office-type uses, not for filming. As in most businesses, there would be concentrated periods where deadlines require more intense work schedules, but that would impact the hours of parking, not the number of spaces.

1 3 - 2

This comment is an introduction to more specific comments, and responses to those comments that follow. Please refer to the responses to comments 13-3 through 13-8.

1 3 - 3

Lane widths of 11 feet are not uncommon in San Francisco. For example, lanes on Richardson Avenue are approximately 10 feet wide. It should be noted that large vehicles would not be turning into the Lombard Street Gate since vehicles weighing more than 3,000 pounds are prohibited on Lyon Street. However, it is possible that large vehicles traveling straight through on Lombard Street could strike the gate columns. The potential for this occurrence, and measures to further protect the historic gate post, would be considered as part of a detailed traffic signal and striping plan developed for the intersection of Lombard and Lyon streets (Please refer to mitigation measures TR-2, *Lombard Street/Lyon Street Intersection Improvements*, and TR-5, *Construction Traffic Management Plan*).

Under the preferred alternative in the year 2010, approximately 340 vehicles are projected to be leaving the Presidio and turning left from Lombard Street to Lyon Street. This left-turn volume would produce a queue of five vehicles during the p.m. peak hour. As Lombard Street is sufficiently wide to lengthen the left-turn lane beyond 30 feet if necessary, the length of the eastbound left-turn lane could be extended if necessary.

1 3 - 4

The two intersections along Richardson Avenue were analyzed as signals that are coordinated to favor the progression of southbound vehicle flow during the a.m. peak period and favor the progression of northbound traffic during the p.m. peak period. The two new intersections along Richardson Avenue were analyzed because they would be the most critical intersections to ensuring effective traffic flow into and out of the Presidio. The intersections along Gorgas Avenue would receive substantially less traffic, and therefore, could be coordinated to work with the intersections along Richardson Avenue. Traffic entering Gorgas Avenue from Richardson Avenue at the new intersection would have a free right turn onto Gorgas Avenue westbound, while traffic on Gorgas Avenue would be stop-sign controlled. A similar free left turn would be provided from Gorgas Avenue westbound into the planned garage entrance for the Letterman Complex development. This network of stop signs and free turns would ensure that traffic entering and exiting via the new intersections would not impact Richardson Avenue operations. Please refer to master responses 18 and 22.

1 3 - 5

Refer to master response 18.



1 3 - 6

The distance between the buildings is about 50 feet. Two lanes of traffic would require no more than 25 feet in width. Therefore, there should be sufficient space for pedestrian access to the buildings. The grade differential will be addressed in conceptual design and the Project Study Report. Refer to master response 23.

1 3 - 7

Refer to master response 18.

1 3 - 8

Refer to master responses 18, 21, and 22 regarding the current proposal and longer range access to the Letterman Complex.

1 3 - 9

No changes to Torney Avenue are anticipated under any of the alternatives. In response to the comment, new text has been added to the Access, Circulation, and Parking section of the Planning Guidelines in Appendix B to include a design principle to minimize traffic generated by the new development on smaller historic roads such as Torney Avenue, O'Reilly Avenue, and General Kennedy Avenue. See master responses 22 and 23.

1 3 - 1 0

No changes to O'Reilly Avenue circulation are expected under any of the alternatives. The character of O'Reilly Street as a historic residential street is recognized as an important feature and is identified for retention as an internal circulation corridor as well as accommodating for pedestrians and bicycles. The historic layout of the Letterman Complex street system is considered to be an important characteristic of the site's overall cultural landscape, and would be retained and rehabilitated as much as possible while meeting contemporary needs. Also, see master responses 22 and 23.

1 3 - 1 1

Changes to General Kennedy Avenue are not expected under any of the alternatives. As noted in the Planning Guidelines, the street would be retained as an internal circulation corridor. The streetscape's historic character, including its narrow width and historic landscaping, would not be affected. See master responses 22 and 23.

1 3 - 1 2

Please refer to master response 23 for a discussion of the O'Reilly Avenue setback.

1 3 - 1 3

Connections, both visual and physical, from the historic hospital complex to the new 23-acre development site are an important concept addressed in the Planning Guidelines, in Appendix B, specifically the design principles contained in the Land Use and Public Access section. These design issues would be carefully studied in the planning and design process, which would ensure that any undertaking is in keeping with the character of the historic district and the Planning Guidelines. Please refer to master responses 23 and 25 for Impacts on Public Access. Also, see mitigation measure CR-1, *Planning and Design Guidelines*, for details about the design development process.

1 3 - 1 4

See response to comment 6-2.

1 3 - 1 5

The Presidio Trust agrees on the importance of a good connection with BART, and improving such a connection will be part of the eventual TDM plan for the new development. Such improvement could come from upgrade of current MUNI service, possible contracting with Golden Gate Transit or through direct Presidio shuttles. As the TDM program is negotiated with the project proponent, the Presidio Trust will indicate the interest of the commentor in participating in such a program. In the interim, the Presidio Trust has been working directly with MUNI to upgrade its express service from BART and invites the organization and its tenants to utilize it.

1 3 - 1 6

For response to the comment concerning the need to comply with the programmatic vision and uses outlined in the GMPA, refer to master response 2A and Sections 1.1 and 1.2 of the Final EIS.



GOLDEN GATE NATIONAL RECREATION AREA
AND POINT REYES NATIONAL SEASHORE

ADVISORY COMMISSION

MINUTES OF THE ADVISORY COMMISSION MEETING
JUNE 15, 1999

[A verbatim transcript of this meeting is available for public review in the Office of Public Affairs and Special Events, GGNRA, Building 201, Fort Mason, San Francisco, CA 94123. The following is a brief summary.]

Meeting time: 7:30 to 10.00 p.m.
Location: Building 201, Fort Mason, San Francisco, CA

Present for the Advisory Commission:

Chair Rich Bartke, Vice Chair Amy Meyer, Michael Alexander, Mel Lane, Carlota del Portillo, Lennie Roberts, Merritt Robinson, Hank Sciaroni, Jack Spring, Ed Wayburn and Jacqueline Young.

Staff Liaison: Michael Feinstein.

Present for the Golden Gate National Recreation Area:

Acting General Superintendent and Presidio General Manager B.J.Griffin, Director of Strategic Planning Mike Savage and Realty Specialist Richard Lauthan.

Present for the Presidio Trust:

Executive Director Jim Meadows and Planning Manager Carey Feierabend.

Summary of Matters Discussed:

GGNPA ANNUAL REPORT

Commissioner Young, who is the Advisory Commission's liaison to GGNPA, introduced Greg Moore, its Executive Director. Greg, with the aid of a slide presentation, showed Commissioners how much the Association has done in the past year to support the park in four primary areas: education program support, park improvement and conservation projects, community and stewardship programs and, their largest project to date, the Crissy Field restoration project.

Presidio Manager B.J. Griffin thanked Greg and added their appreciation for the work that the GGNPA does. She said it was the best example of a partnership that GGNRA has.

MARIN HIGHWAY 1 TRANSPORTATION PLAN/BAY AREA WATER TRANSPORTATION PLAN

Strategic Planning Director Mike Savage said they are working on a transportation plan for the park, a parklands transportation task force in the region and a plan for Route 1 with Marin County and Caltrans. He is also working with the Bay Area Ferry Task Force on developing access to Fort Baker, Crissy Field and Fort Mason. He introduced two people from that task force, Sean Randolph and Ian Austin. Sean said a recommendation was released last April for the creation of a comprehensive water transit system for San Francisco Bay. A bill in the Assembly would create a Bay Area Water Transportation Authority to plan and design the

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system. Ian described the routes, with the aid of slides, which would allow people to leave their cars and move around the Bay through a system of intermodel connections, and which would allow disaster recovery to take place if it became necessary. Chairman Bartke gave the web site for the plan: www.bayareacouncil.org, and said the matter would be coming back to the Commission for public input as progress is made, probably within the next 90 days.

PLAN FOR MARIN CELL SITE PROJECT

Realty Specialist Richard Lauthan said he is processing Cellular One's application for a cell site to be located on a light standard on Alexander Avenue in East Fort Baker. This will entail two antennas plus a utility cabinet screened by natural vegetation to be planted there, the power source coming from the Caltrans system that feeds the light standard. The public comment period will commence upon publication in the Marin Journal this week and will be open until July 21. NPS has developed proposed guidelines which should be finalized sometime in July. Richard added that although under the legislative and executive mandate they are required to process the applications, they are not obligated to approve every cell site.

Public Comment:

Patricia Vaughey (Cow Hollow Assn.) said Cow Hollow was a test case for cell antennas in the city and their group formed guidelines for the City and County of San Francisco. She invited staff to come and talk to her group and get the benefit of their experience.

SUPERINTENDENT'S AND PRESIDIO GENERAL MANAGER'S REPORT

In the absence of the Superintendent and Deputy Superintendent, B. J. Griffin talked about the In-park Partnership Conference held in May which brought land-managing agencies and their cooperating partners together to brainstorm ways to further their organizations. Fort Baker planning is continuing and progress is being made. There was a press conference on Angel Island announcing that the Immigration Station was chosen as a threatened historic resource. NPS is coordinating a study of the station's potential for a museum.

PRESIDIO TRUST DIRECTOR'S REPORT

Director Jim Meadows described the agreement reached with the Army which will result in an accelerated environmental cleanup of the Presidio. The Trust announced that the Board had chosen as its preferred alternative Lucas Film's Digital Arts Center, and will begin exclusive negotiations with them. He announced the extension of the public comment period for 45 days, ending now in the first week of August. He said that not only has the Trust expanded the free DEIS copies available in public locations, but their offices are now open on Saturdays. The public comment period on the Presidio Vegetation Management Plan which began June 9 at the monthly planning workshop will continue throughout the summer, including the Advisory Committee meetings of July 20 and August 17. Improved Muni service to the Presidio has been negotiated, a map of which can be found at the Trust's web site: www.presidiotrust.gov, then click on "Directions." Two dozen interns from all over the US will be working for the Trust this summer. And, last, a collaboration between the Trust, NPS and U.C. Berkeley are conducting a Funston Avenue archeological research project on a site rich in the Spanish-colonial, Mexican-American period.

PRESIDIO LETTERMAN DRAFT EIS

Planning Manager Carey Feierabend gave an abbreviated history of the DEIS, culminating in the selection of the preferred alternative and the extension of the public comment period. She went on to describe the Digital Arts Center, the setting, the demolition of both buildings, the 2,500 employees whose housing would be accommodated within the Presidio and the 1,500 parking spaces underground. It is anticipated that a final EIS will be arrived at

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sometime in late September or early October. She encouraged written comments which could be mailed to the Trust's mailing address, or sent to the web site at Planning@presidiotrust.gov.

Public Comment:

China Brotsky (Thoreau Center), as the most immediate neighbor, said she was concerned with parking and traffic issues, access and egress, the local street system, urban design, environmental issues and compliance with the vision and uses in the GMPA. 14-1

Brian Huse (NPCA) said the EIS violates the NEPA process and fails to provide a sense of how each alternative will contribute to or detract from a comprehensive vision for the park. Also, there is no analysis of the cumulative impacts to the park as a whole. 14-2

Johanna Wild (NRDC) is concerned that the choice of developer has been made before completion of the NEPA process, that the DEIS contains no information about a comprehensive management plan, and that the analysis of environmental and cumulative impacts is inadequate. 14-3

David Coggeshall complimented the Trust on a very professional and probably difficult selection process. He said he feels it is important to put out a message to the rest of the country and added that we are fortunate to have a partner such as Lucas to help to do that. 14-4

David Sibbet (Presidio Alliance) commended the Trust for extending the public comment period and was pleased that they want to continue receiving input around the design of the project. But input, he said, is not engagement. He encouraged the Trust to think a little bit beyond input as the only measure of what public involvement means. 14-5

Doug Kern (Urban Watershed Project) complimented the authors of the DEIS for mentioning the protection of Tennessee Hollow, then corrected them saying a check of the storm drain maps indicate that the Letterman storm drains do in fact go right to Crissy Field, a potential significant impact that should be reviewed in more detail in the final document. 14-6

Carolyn Blair (SF Tree Council) urged the preservation and protection of the existing trees in the park, and said they hope Lucas will not cut down the incredible grove of what she believes are Italian stone pines at the Letterman complex. 14-7

Alma Robinson (CA Lawyers for the Arts) congratulated the Trust for selecting an arts organization, which they had advocated, and hopes they will think about alternative housing for the employees, such as co-housing, live-work space and studio space. 14-8

Michael Levin finds it hard to accept a 900,000 profit-making enterprise within the boundaries of national parklands, although he knows self-sustainability is a mandate. He hopes the final EIS will incorporate everything necessary to preserve the Presidio. 14-9

Lucia Bogatay (Ft. Point-Presidio Historical Assn.) hopes the Trust thoroughly investigates the site for archeological remains before beginning construction. They believe the 23 acres should be reduced in density by locating some of Lucas's activities to another site, and concur with others that a master plan update would be helpful. 14-10

Courtney Damkroger (NTHP) said the preferred alternative does not appear to meet the general objectives of the GMPA. If the Trust is not going to embrace the GMPA, then it should produce a management plan that allows for meaningful, formal public involvement. They believe the Trust would be best served by sharing its financial plan with the interested public. 14-11

Joel Ventresca (Preserve the Presidio Campaign) said the EIS is inadequate, incomplete and misleading, and does not disclose the square footage for parking. Introducing a massive for-profit new commercial development complex which will have little to do with enhancing the park experience is unprecedented in American history, he said. 14-12

Donald Green said he and other groups have already urged the Trust to develop a comprehensive plan for the Presidio. He urges the Trust to start the comprehensive management program tonight so that in six weeks the public could comment on the EIS in a meaningful way. 14-13

Arthur Feinstein (GG Audubon Society) asked what impact 4,500 new employees in the park are going to have on the natural resources? The palm trees in the Letterman Complex are well-known as a resource for hooded orioles but, he asked, are the palm trees going to be 14-14

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preserved? He would like both those questions answered in the final EIS.

4 14-14

Richard Casey has also found shortcomings in the DEIS. The purpose of the Presidio Park is to provide a recreational facility, he said. Yet such a topic as impact on recreational use is not included as one of the criteria for evaluating development proposals.

14-15

Bryan Foster questioned the value of digital art in general, although he did go to see Toy Store. Open space is not just open, he said, it is empty: a park. Call all the universities and suggest that they have satellite campuses there and pay to use the buildings. Use the place as a meeting center. It would pay for itself and be a great asset and a benefit to tourism, he believes.

14-16

Bill Hough (Resource Center for UN) said the United Nations Center in Building 104 was left off the Lucas model plan when it was unveiled. To him, that was symbolic: the financial considerations are the means to create the vision of a world-class center but the means, the financial, has become the end. He suggested the vision statement be made more easily available on the Trust's web site.

14-17

Steven Krefting (SF League of Conservation Voters) said they believe the Trust needs to take a step back from its headlong rush to finalize a developer, that the current process will not achieve the public trust necessary for success and that a new planning process is required which is more firmly focused on the vision developed through the GMPA process.

14-18

Jennifer Gridley (Cow Hollow Assn.) said that while they are pleased with the selection of the preferred alternative, they continue to be concerned about density and parking and traffic. There has been no discussion regarding a potential change from a single tenant to a multi-use tenant, likely to have more employees but with the same number of parking spaces. Further, the planning guidelines look only at the area within the Presidio walls, and they urge the Trust to take a more indepth look at the effects on the area surrounding the Letterman site.

14-19

Patricia Vaughney (Cow Hollow NIA) said that they have several concerns, such as traffic patterns, alternative solutions for left-hand turns, the noise of construction trucks and their entrance and egress, the pipes in Letterman hospital and the water flow, Doyle Drive and the problem of commissary and Burger King trucks exiting Gorgas onto the Lyon Street corridor instead of a commercial corridor.

14-20

COMMITTEE REPORTS

Marin Committee. Chair Merritt Robinson said the discussions on water and land transportation and the cell phone sites that were presented that night at the Commission meeting were the subjects covered in committee.

San Francisco Committee. Chair Jack Spring said the committee took a tour which began at the Great Highway and the Parcel 4 complex, where they were given a brief history of the parcel. Later they hiked up a new trail into Sutro Heights Park, then went on to East Fort Miley for a briefing and discussion of its potential.

There being nothing further to come before the Commission, Chairman Bartke said their next meeting would be held at 7:30 p.m., Tuesday; July 20, 1999, in the same place. The meeting was adjourned at 10:00 o'clock p.m.

There were approximately 85 members of the public present.

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Responses to Comments in Letter 14

1 4 - 1

Please refer directly to letter 13 and corresponding responses for a detailed discussion.

1 4 - 2

For the response to the comment concerning the NEPA process, refer to master response 1B. For the response to the comment concerning the adequacy of the alternatives, refer to master response 6A and Section 2.1 of the Final EIS. Concerning the cumulative impacts analysis, refer to master response 4B. Please refer directly to letters 7 and 44 and corresponding responses for a detailed discussion.

1 4 - 3

For response to the comment concerning a comprehensive management plan and cumulative impacts analysis, refer to master responses 4A and 4B. For response to the comment concerning the apparent selection of a developer during the NEPA process, refer to master response 6B and Section 5.2 of the Final EIS.

1 4 - 4

Comment noted.

1 4 - 5

Comment noted.

1 4 - 6

Please refer directly to letter 48 and corresponding responses for a detailed discussion.

1 4 - 7

Please refer directly to letter 40 and corresponding responses for a detailed discussion.

1 4 - 8

Comment noted. Co-housing, live-work space, and studio space are all possible future uses for existing housing and non-residential buildings at the Presidio.

1 4 - 9

Comment noted. The Final EIS incorporates many of the suggestions made in the comments for protecting the Presidio and adds new analysis and information to the Draft EIS where required.

1 4 - 1 0

Please refer directly to letter 33 and corresponding responses for a detailed discussion.

1 4 - 1 1

The Trust believes the preferred alternative meets the General Objectives of the GMPA. For further response to the comment, refer to master responses 3A, 3B and 2A. For response to the comment concerning a comprehensive management plan, refer to master response 4A. For response to the comment concerning the public availability of the Trust's financial plan, the commentor is referred to the Trust's Financial Management Program in Appendix E of the Final EIS and master responses 5, 10A and 10B.

1 4 - 1 2

Please refer directly to letter 23 and corresponding responses for a detailed discussion.

1 4 - 1 3

For response to the comment concerning the need to develop a comprehensive plan for the Presidio, refer to master response 4A.

1 4 - 1 4

Please refer to master response 16. Also, please note that approximately 2,500 employees would work at the site under the preferred alternative, not 4,500 as reported in the minutes.

1 4 - 1 5

Please refer directly to letter 16 and corresponding responses for a detailed discussion.

1 4 - 1 6

Please refer directly to letter 54 and corresponding responses.

1 4 - 1 7

The building has been added to the model. The commentor's suggestion is noted.

1 4 - 1 8

The comment is noted for the record. On these issues generally, refer to master response 2A.

1 4 - 1 9

Please refer directly to letter 15 and corresponding responses for a detailed discussion.

1 4 - 2 0

Please refer directly to letter 32 and corresponding responses. The Presidio Trust has been, and will continue to be working closely with the organization and other neighborhood groups to resolve traffic issues in the Letterman Complex and adjacent areas.



Letter 15

COW HOLLOW ASSOCIATION

2867 Green Street
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(415) 567-8611

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June 15, 1999

NEPA Compliance Coordinator
Attn: Letterman Complex
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

Via Facsimile: 561-5315

Via e-mail: Presidio@presidiotrust.gov



The Cow Hollow Association represents residents in the area bounded by Lyon and Pierce Street on the West and East, and Greenwich and Pacific on the North and South. Our comments here are with regard to the Draft Environmental Impact Statement (DEIS) and Planning Guidelines for the new development and uses within the Letterman Complex.

While we are pleased with the selection of the Letterman Digital Arts proposal as the preferred alternative, we continue to be concerned about the overall density of the project. Nine hundred thousand square feet and 2,500 employees on a 23-acre site is four times the current density of Cow Hollow.

Traffic and parking have been issues throughout this process. Thankfully, the preferred alternative offers parking underground. However, there are 1,500 parking spaces for the proposed 2,500 employees. We have been assured that the employees will be given incentives to use alternative means of transportation such as ridesharing and vanpools. We still have several concerns however: 1) the proposed development will be under construction and perhaps complete before any improvements have been made to the affected intersections or to Doyle Drive, and 2) there has been no discussion regarding the potential change from a single tenant to multi-use tenants who would likely have many more than 2,500 employees with the same 1,500 parking spaces.

15-1



NEPA Compliance Coordinator
Page Two
June 15, 1999

The Planning Guidelines presented in the DEIS document discuss building form, architectural compatibility, and edge conditions. The guidelines suggest that the development should be compatible in scale with the residential character of the buildings along Lyon Street, and that the development should respect the historic green space at the edge along O'Reilly Street. The Letterman Digital Arts proposal does not conform to these guidelines. The massive five-story building at the O'Reilly edge dwarf the row of residential buildings across the street, and the building at the corner of Lombard and Lyon is certainly not compatible with the residential character of the buildings along Lyon Street.

15-2

Finally, The Cow Hollow Association urges the Presidio Trust to take a much more in depth look at the long term effects on the greater area surrounding the Letterman Site, not just inside the Presidio wall. Equally important is the need for a comprehensive plan which considers all of the proposed development within the Presidio including the Public Health Service Hospital, Fort Scott, and additional housing that may be constructed.

15-3

We appreciate the opportunity to be an integral part of this planning process, and looks forward to working with both the Presidio Trust and Lucas Films to refine the preferred alternative to one that is compatible with our neighborhood.

Sincerely,



Carol Livingston
President

cc. Cow Hollow Board of Directors
Golden Gate National Recreation Area Advisory Commission



Responses to Comments in Letter 15

1 5 - 1

It is unlikely that improvements to Richardson Avenue would be completed prior to the start of construction of the project. Consequently, the construction traffic routing shown on Figure 19 of the Final EIS and discussed in Section 4.1.7.6 assumes no improvements to existing roads and highways. A construction traffic management plan as discussed in mitigation measure TR-5, *Construction Traffic Management Plan*, would be developed to further specify routes, times of operation, and other factors to mitigate construction impacts on neighbors both inside and outside the park.

In response to the comment concerning future use by a multi-use tenant with more than 2,500 employees, the parking demand calculation for the preferred alternative incorporates the potential that the 900,000 square feet could be occupied by standard office-use tenants. The 1,530 spaces proposed by the preferred alternative's development team would be adequate to accommodate the demand. In addition, see master response 20 for a discussion of parking demand and capacity.

1 5 - 2

For each alternative, inconsistencies with the Planning Guidelines are described and an assessment of their effects on the historic district are analyzed and documented within the Environmental Consequences section of the Final EIS. Text has been added to this section to further clarify these consequences. See master responses 7A and 7B discussing consistency with the Planning Guidelines and future public involvement.

1 5 - 3

For a response to the comment concerning long-term effects on the surrounding neighborhoods, please refer to master response 17. For a response to the comment concerning the need for a comprehensive plan, refer to master response 4A.

Letter 16

-----Original Message-----

From: rgcasey@ix.netcom.com [mailto:rgcasey@ix.netcom.com]

Sent: Tuesday, June 22, 1999 11:30 AM

To: planning@presidiotrust.gov

Subject: DEIS comments

Comments on the Draft Environmental Statement
Offered June 15, 1999 before the Presidio Trust Advisory Commission

Richard Casey
1785 Webster Street
San Francisco, CA 94115
Representing myself as one who enjoys walking and cycling in the Presidio, and
is concerned about its future.

I would like to point out what I think is a serious oversight in the DEIS, or at least
in the summary available over the
Internet. The purpose of the Presido Park, as one speaker in the last meeting
pointed out by reading from the Congressional
Record, is to provide a recreational facility. Yet the DEIS does not include
"impact on recreational use" as one of the
criteria for evaluating technical proposals.

I can imagine many ways in which proposed developments could interfere with
hiking, cycling or simply touristic enjoyment of
the Presidio. I think that this aspect of development should be specifically
addressed in the evaluation process, along with
such criteria as water quality, solid waste disposal, employment, wildlife, noise
and air quality, which are already discussed
in the DEIS. Even if recreational impact is included somewhere in the complete
report, it should appear in the summary, the
document that most people will read.

16-1



Response to Comment in Letter 16

1 6 - 1

Thank you for your letter. The impacts on recreational opportunities are discussed in Appendix A (Section W. Recreation) and Sections 4.1.7.4 through 4.6.7.4 (Impacts on Pedestrian and Bicycle Facilities) of the EIS. In addition, Sections 4.1.8.5, 4.2.8.7 through 4.5.8.7, and 4.6.8.5 (Effects on Visitor Experience) have been added to the text. The text in the Summary has been revised to reflect the major conclusions in the discussions. In addition, please refer to master response 25.



Letter 17

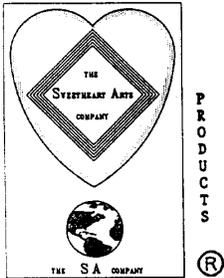
MARILYN D. MINTZ

PRESIDENT
THE SWEETHEART ARTS COMPANY, INC.

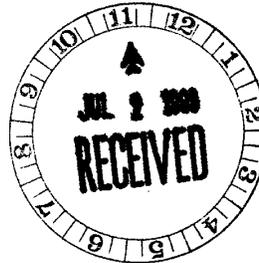
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June 30, 1999



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Mr. John Pelka
NATIONAL ENVIRONMENTAL POLICY ACT COORDINATOR
PRESIDIO TRUST
P.O. Box 29052
San Francisco, CA 94129-0052

Re: Mr. George Lucas' request for a campus at the San Francisco Presidio;
Marilyn D. Mintz, President of THE SWEETHEART ARTS COMPANY, INC.
believes that Mr. George Lucas is flagrantly infringing on her intellectual
property

Dear Mr. Pelka:

Should Mr. George Lucas be rewarded with permits to build on the San Francisco Presidio, if he is allegedly egregiously infringing on United States' intellectual property rights protected property?

It is my understanding that Mr. George Lucas is flagrantly violating United States' intellectual property laws by allegedly egregiously infringing on my intellectual property rights protected property.

June 15, 1999, prior to the public hearing, I telephoned the Presidio Trust to tell of my strong objections to the George Lucas Presidio Campus, because I understand that Mr. Lucas is flagrantly infringing on my intellectual property. (I spoke with Ms. Anita Roberts, Leasing Assistant.)

During 1997, I mailed to Mr. George Lucas letters by certified mail, with return receipt, that were returned to me, not accepted; so I had to FAX my letters to him regarding, "it is my understanding ...", that he is infringing on my intellectual property.

I believe that much of the merchandising for STAR WARS trilogy and PHANTOM MENACE film, including many of the main characters, are infringing on my intellectual property rights protected property.

My background includes my M.A. in Film and Television from the University of California at Los Angeles. I expanded my 1975 Master's Degree thesis into THE MARTIAL ARTS FILMS book, (1978), the first book to describe and define the genre, that received excellent reviews.

Enclosed are copies of five of my advertisements, that show some of my intellectual property rights protected property.

My intellectual property that I believe Mr. George Lucas is infringing on includes from about 1965 through 1976, for the 1977 release of STAR WARS film, and continued through the STAR WARS trilogy. I allege additional infringements are in the 1999 PHANTOM MENACE film, including infringing on my 1997 registered copyrights.

Should Mr. George Lucas be rewarded with permits to build on the San Francisco Presidio, if he is allegedly egregiously infringing on United States' intellectual property rights protected property?

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Page 2 of 2

Mr. John Pelka
NATIONAL ENVIRONMENTAL POLICY ACT COORDINATOR
PRESIDIO TRUST
P.O. Box 29052
San Francisco, CA 94129-0052

Marilyn D. Mintz
THE SWEETHEART ARTS COMPANY, INC.
P.O. Box 1411
Los Gatos, CA 95031
June 30, 1999

(Continued)

Sincerely,

Marilyn D. Mintz

Marilyn D. Mintz

cc: Mr. Jim Meadows, Executive Director of the PRESIDIO TRUST
Ms. Anita Roberts, Leasing Assistant
Ms. Susan Ju, Real Estate Assistant

Enclosed:

1. Two pages of copies of some excerpts of some reviews of my 1978 book, THE MARTIAL ARTS FILMS, (expansion of my 1975 U.C.L.A. Master's thesis)
THE MARTIAL ARTS FILMS is the first book to define and describe the genre.
2. Five pages of copies of my advertisements, that were printed in magazines that were also distributed at the New York International Toy Fair, or in an international licensing guide
3. Marilyn D. Mintz's business card; Marilyn D. Mintz is Inventor and Creator of the SWEETHEART ARTS® Doll, and Founder and President of THE SWEETHEART ARTS COMPANY, INC.

MAILED BY U.S. Express Mail, July 1, 1999

FAX Date: July 1, 1999



Response to Comment in Letter 17

17-1

Thank you for your letter. This issue is not related to the NEPA analysis. The NEPA regulations provide that comments on an EIS need only address the adequacy of the statement, or the merits of the alternatives discussed, or both.



Letter 18

The National Parks and Conservation Association posted an electronic form letter on its webpage that was sent by 100 individuals. The list of individuals whom submitted the letter appears immediately following the master responses (page 55). A copy of the letter that was posted is reprinted here. All sent letters are available for review at the Presidio Trust.

I am writing to voice my concern about the potential mismanagement of the Presidio's unrivaled cultural, natural, and historic resources and to urge you to select an alternative for the Presidio that genuinely complies with the plan developed through an open public process by the National Park Service.

18-1

It has recently been brought to my attention that the Presidio Trust, the group responsible for ensuring the restoration of the Presidio's 500 historic buildings while preserving the integrity of the area according to national park standards, has already begun exclusive negotiations with Lucas film's Letterman Digital Arts Ltd. In addition to raising serious process concerns by starting negotiations before the August 2, 1999 public comment deadline, the Presidio Trust is placing the Presidio at risk by choosing the option that:

18-2

- * devotes the highest proportion of space to private industry; 18-3
- * is lease compatible with the Park Service's original plan; 18-4
- * brings in the greatest number of commuting employees; 18-5
- * provides the fewest public amenities; 18-6
- * his the lest devotion to any educational purpose; 18-7
- * is the least compatible with the Trust's own published guidelines; and 18-8
- * amounts to the industrialization of the Presidio. 18-8

If the Presidio Trust cannot find an alternative that complies with park objectives and the Trust's goals and guidelines, then they need to amend their management plan. The Trust claims that its decisions are based on financial necessity, however the Trust's annual budget expectations remain undisclosed to the public. The Trust needs to make its financial plans public to give the public an opportunity to propose other means for the Trust to meet its obligations.

18-9

I strongly urge the Trust to rethink their plan and avoid sacrificing irreplaceable national park resources in the name of financial expediency.

18-10

Sincerely,



Responses to Comments in Letter 18

1 8 - 1

Thank you for your letters. The Presidio Trust manages the properties under its administrative jurisdiction in accordance with the purposes set forth in Section 1 of the Golden Gate National Recreation Area Act and the General Objectives of the GMPA. As such, the Presidio Trust shares the commentor's concern for the long-term preservation of the cultural and other resources of the Presidio. Following meaningful public involvement, the Presidio Trust selected the alternative that it believes would best fulfill its statutory mission and responsibilities, given consideration to economic, environmental, technical, and other factors. These factors included compliance of the alternative with the GMPA which is discussed in Sections 4.1.1.2 through 4.6.1.2 of the EIS. See master responses 2A and 3B.

1 8 - 2

For response to the comment concerning the start of negotiations during the NEPA process, refer to master response 6B.

1 8 - 3

This statement is not supported by the facts. As discussed in Section 4.5.1.2, among all alternatives, a Digital Arts Center may come closest to adhering to the NPS's original plan for the Letterman Complex. Refer to master response 2A.

1 8 - 4

Table D-3 in the Draft EIS indicates that the preferred alternative would generate the least peak-hour traffic, with the exception of the no action alternative.

1 8 - 5

The commentors' opinion is noted for the record. As discussed in Section 2.5, public amenities provided by the preferred alternative include a 7-acre "Great Lawn," a significant site feature for park visitors which devotes the largest amount of public open space compared to the other alternatives. Also, refer to master response 25.

1 8 - 6

The commentors' opinion is noted for the record but is not shared with the San Francisco Unified School District (letter 43), the American Association for the Advancement of Science (letter 63), or the California Department of Education (letter 64). The preferred alternative includes an education foundation, an archive related to the digital arts, and an institute offering a digital arts training program. Both the archives and educational institute would provide public programs, including outreach to a diverse community, introducing schools and students to emerging multi-media/digital technologies.

1 8 - 7

Please refer to master response 7A.

1 8 - 8

Please refer to master response 2A and Section 1.1 of the Final EIS.



L E T T E R 1 8

1 8 - 9

The Trust does not believe there is a need to amend the GMPA. For a more complete response to the comment, refer to master responses 2A and 2B. For response to the comment concerning disclosure of the Trust's financial plan, refer to master response 5 and Section 1.2 of the Final EIS.

1 8 - 1 0

The concerns of the commentors are noted for the record. For response to the comment concerning sacrificing the park for financial expediency, refer to master response 2A.



Letter 19

My dear freinds,

I write to you and humbly ask that you copy and paste the below letter, removing my name and replace it with yours- you do not need your adress- but it would be nice. The purpose of this letter is to help save the historic resources of the Golden Gate National Recreation Area. It is in danger of being developed.

I also ask that you copy and paste the letter and send it to those you know who would also want to help. Have them follow the same directions. In order to look somewhat decent- cut and paste please. This is a real letter- I wrote it myself. This is not some fake chain letter. But if you do send it- that is nice- if you don't send it- then it is your thing. thanks in advance!

Greg

Here is the adress where you can send the e-mail:

Presidio@presidiotrust.gov

Remember! Get your pals to help, too!

Here is the letter that I wrote:

To whom it may concern:

I am writing to you in regards to the current situation at Golden Gate National Recreation Area, specifically the Presidio of San Francisco. By writing this letter I wish to voice my sincere fears about this feature of the park and it's preservation.

The notion that the Army's obsolete buildings located at the site should be razed to make room for privatization is frightening In doing so several factors come into play ranging from preservation to issues of land use and support of these new facilities.

At first privatization may seem an easy way to ease concerns over money, but long range planing reveals that it is not the case. An excellent example is the Manasas battlefield. With the county being blinded by the easy money offered by development, they failed to see the hidden costs that far outweighed the benefits. These costs included the rerouting of roads, providing parking, creating adequate systems to care for sanitation needs and so on. More importantly the county officials failed to see the irreparable harm that would befall the historic battlefield.

19-1



LETTER 19

The decision that those in charge of the Presidio Trust have made to negotiate exclusively with Lucasfilm's Letterman Digital Arts Ltd. is a dangerous one. In doing so any claim that the Trust is committed to the plan developed by the National Park Service in 1994 is unfounded. Private development on NPS lands or those that are involved in any form of long range planing represent a dangerous precedent. The Letterman Hospital site would be better used in housing a not for profit site dedicated to learning or being made into a park.

Several problems would be avoided by not utilizing this land for private development. Committing a large percentage of space to a private firm is least compatible with the Park Services plan. It brings in a large number of commuting employees that provides the Park with an unnecessary hardship. It devotes excessive space to parking which could better serve the public as a park or museum. The site will likely not provided enough public amenities. And finally this plan amounts to the industrialization of the Presidio. It is for these reasons that National Parks, such as the Presido, can not support private sites.

Though Lucasfilms contends that they provide educational resources, the Letterman project is not one of those educational services. A national historic area is not the site for private business. In addition this industrialization does not mesh with the guidelines set up by the National Park or the Presidio Trust.

Could the land not be better used for government purposes? Could the land not be better used for public education? Could the land not be used for museums seeking additional space such as San Francisco's DeYoung or Academy of Sciences? Parks serve the people of our nation in this way-not businesses.

I wish that those in charge of the Presidio Trust select an alternative plan that allows the Park Service's original plan reach fruition. And I ask that the Trust also makes it's financial plans public and give the people of the nation an opportunity to voice their opinions in regards to the future of this site.

Thank you,
Gregory D. Specter
5286 Sell Road
New Tripoli, PA 18066

19-1



Response to Comment in Letter 19

1 9 - 1

The commentors' concerns are noted. For response to comments concerning the precedential effect of privatization, refer to master response 8. For response to comments concerning consistency of the proposed action with the GMPA, refer to master response 2A. The commentor's concerns about the scope of alternatives that have been considered are addressed in master response 6A. The Trust disagrees that the scope of alternatives considered have been insufficient. Additional evaluation of alternatives was conducted in conjunction with the preparation of the GMPA, and the commentor is referred to the EIS for the GMPA, from which this EIS is tiered, for analyses of further alternatives. See also Section 2.1 of the Final EIS. With respect to concerns about exclusive negotiations with Letterman Digital Arts, Ltd., the commentor is referred master response 6B. On the issue of making the Trust's financial plan publicly available, refer to master responses 5, 10A and 10B.



Letter 20

1

GOLDEN GATE NATIONAL RECREATION AREA
AND POINT REYES NATIONAL SEASHORE

ADVISORY COMMISSION

MINUTES OF THE ADVISORY COMMISSION MEETING
JULY 20, 1999

[A verbatim transcript of this meeting is available for public review in the Office of Public Affairs and Special Events, GGNRA, Building 201, Fort Mason, San Francisco, CA 94123. The following is a brief summary.]

Meeting time: 7:30 to 10.05 p.m.
Location: Building 201, Fort Mason, San Francisco, CA

Present for the Advisory Commission:

Chair Rich Bartke, Vice Chair Amy Meyer, Michael Alexander, Howard Cogswell, Naomi Gray, Redmond Kernan, Mel Lane, Yvonne Lee, Trent Orr, Lennie Roberts, Merritt Robinson, Hank Sciaroni, Jack Spring, Ed Wayburn and Jacqueline Young.

Staff Liaison: Michael Feinstein.

Present for the Golden Gate National Recreation Area:

General Superintendent Brian O'Neill, Planning and Resource Management Specialist Nick Weeks, Plant Ecologist Sharon Farrell and Real Estate Specialist Richard Lauthan.

Present for the Presidio Trust:

Executive Director Jim Meadows and Planning Manager Carey Feierabend.

Summary of Matters Discussed:

APPROVAL OF MINUTES

The minutes of the Advisory Commission meeting of June 15, 1999, were accepted as mailed.

PRESIDIO VEGETATION MANAGEMENT PLAN

Nick Weeks briefed the Commission on the previous public involvement in the plan which has culminated in a joint (with the Trust) Draft Vegetation Management Plan and EA (produced by GGNPA) with public comment scheduled for the August and September Commission meetings. Then, with the benefit of slides, he described the three vegetation components: the historic landscaped vegetation, the native plant communities and the historic forest, and how it is proposed that they be managed.

Carey Feierabend, Planning Manager with the Trust, continued the slide presentation, explaining the proposed implementation strategy and its three phases, the extensive partnership program and the strategies for funding the project.

Sharon Farrell, Plant Ecologist with NPS, described the pilot projects that would be developed during the first five years of the plan (the pre-implementation phase), to gain as much information as possible about soil types, species diversity, the forest understory, etc., through interagency collaboration and by building from an existing knowledge base.

Building 201, Fort Mason, San Francisco, CA 94123



Public Comment:

Bill Shepard (Lake St. Residents Assn.) thinks it is a wonderful document but has concerns in terms of the balance between trees and plants, and asked that the cut-off date be extended to October 15 because a lot of people are away or not available in the summer.

Josiah Clark grew up on Lake Street and would not be supporting the proposed plan if he didn't think it would retain the areas precious to him as a kid running around in the forest.

PRESIDIO LETTERMAN DRAFT EIS

Jim Meadows, Trust Executive Director, reiterated that the EIS process is in parallel with, but is not directly tied to, the selection process in the Letterman Complex. He asked Carey Feierabend to discuss the details of the EIS.

Carey highlighted the milestones in the process: in April, the draft SEIS was released, followed by presentations to the Advisory Commission and by the Trust to the public; at the May Advisory Commission meeting public comment was taken; in June formal announcement of the preferred alternative, a 45-day extension of the review period and public comment; July (the present meeting), further public comment, August 2 being the closing date for comment; in October the final EIS will be released which will respond to all oral and written comments; and in November, a Record of Decision is anticipated.

Public Comment:

Mark DeVine is concerned that the Letterman is scheduled for destruction (he was born there) and thinks it would be damaging to the natural, social and cultural environment.] 20-1

Gail Sredanovic believes that the site could be used in ways more obviously of public benefit such as education, museums, government buildings, that could conceivably bring in revenue, and that all financial plans be made public.] 20-2

Patricia Vaughney (Cow Hollow NIA) thanked the Trust for working with them but she is disturbed by no mention of tour buses in the EIS and no discussion of events in the neighborhoods that interfere and influence traffic flow.] 20-3

Bryan Foster thinks the property should be turned into an environmental study center and the buildings leased out to universities with Letterman as the main administration building and computer center.] 20-4

Steve Bodzin hoped to see an analysis in the final EIS of the effect on Bay Area housing stock of bringing in high-paying jobs, since affordable housing on the Presidio is so far inadequate.] 20-5

SUPERINTENDENT'S REPORT

Brian O'Neill referred to his printed report and said he was just going to mention items that weren't included in that. First, he said, the park is close to completing a deal for the purchase of the Arana property at Lobos Creek, and is exploring the possibility of a donation of the Billman property, also along Lobos Creek, which could then be incorporated within the park under existing GGNRA legislation.

The other issue that he said was causing concern is the future of the Camera Obscura. Under the plan that was adopted, the Camera Obscura was incorporated as a component of the Cliff House rehabilitation. Since there is a new concession agreement in place, the implementation of that plan is now the responsibility of the concessionaire. Also, its potential for addition to the National Historic Register is being evaluated. So either way, the Camera Obscura is going to be preserved. However, in order to begin the rehabilitation of the Cliff House, the new visitors facility at Merrie Way should be ready to receive the functions that are to be moved out of the Cliff House and, as money is short these days, it is taking time to identify the funds necessary to put together a funding package. So the issue of the Camera Obscura will wait an analysis of its historic elements, and then how best to handle it in the rehabilitation of the Cliff House.

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Public Comment:

Rebecca Haycox (Friends of the Camera Obscura Com.) said there is concern that the Camera Obscura is subject to removal after its lease expires on December 31, 1999. She asked that the lease be extended until its acceptance into the National Register, and requested that the matter be placed on the agenda for the next Commission meeting.

Peggy Vincent presented the Commission with a book of Playland at the Beach photos and memorabilia, saying that the Camera Obscura is the last remnant of Playland's attractions. She said she drove down from Santa Rosa to ask the Commission to please save the Camera Obscura in its current location as a piece of San Francisco history.

David Warren said he seems to come to a Commission meeting every ten years to try to save the Camera Obscura, which is more than just a little box that sits there at the ocean's edge. He said it is the only building that exists about Playland and represents a very important form of architecture, and believes it would be nice if people could continue to visit it.

Thomas Roop said he has lived in this area all his life (50 years) and coming to the GGNRA is new to him. But the Camera Obscura and Playland at the Beach is not new. He thanked Mr. O'Neill for applying to the National Register of Historic Places and asked the Commissioners to help save the Camera Obscura.

Chairman Bartke assured the speakers that there were no plans to eliminate the Camera, and suggested putting it on the agenda several months from now when there actually may be something to discuss. Superintendent O'Neill agreed and said they want the Camera Obscura to continue to operate as it is until the public process for the redesign of the Cliff House actually occurs. Chairman Bartke said they would all be notified when the meeting date is established.

GGNRA PARKWIDE WIRELESS TELECOMMUNICATIONS FACILITY GUIDELINES

Richard Lauthan, a real estate specialist with GGNRA, presented the revised guidelines for cell sites to the Commission, incorporating input received at the last Commission meeting, and said he was here to respond to any questions anyone had.

Commissioner Meyer said she could not advise the Park Service based on the document, having no clear feeling of what she was being asked to vote on. Commissioner Wayburn was critical of the failure to mention in the document the cumulative impacts of all the companies which would have a great deal to do with site guidance and the issuance of permits. Chairman Bartke suggested they hear from the public, then from other Commissioners.

Public Comment:

Libby Kelly said she was with a group of citizens who are challenging the FCC in court based on the implementation of the Telecon Act, and she presented the Commission with a packet of information about that case. She said the technology is changing rapidly and there already are alternatives to monopoles. Also, there is a body of research showing there are biological effects which may be cumulative. She talked about the migratory birds on the Pacific Flyway and the millions that are dying annually, and mentioned a proposal to site a large facility on Point Reyes Hills.

David Grace said the microwave towers are very dangerous, and to allow the construction of any of those towers puts both NPS and the Trust at financial risk. He asked if we taxpayers are going to be burdened with a welfare program for the cell companies who will want us to take on financial responsibility and liability for the placement on our property? You may look at it as a revenue source, he said, but they will be looking for financial waivers.

Chairman Bartke thanked the speakers and asked for questions or comments from other Commissioners. Dr. Cogswell asked about the range of height of the towers and if there were going to be guywires, because most of the birds who hit tall structures are night-flying migrants. Trent Orr said he shared Dr. Wayburn's concerns about cumulative impacts and Amy Meyer's concerns about not understanding what it is that is expected of the Commission. Commissioner

Building 201, Fort Mason, San Francisco, CA 94123



Alexander wanted to know more about the new technology that would significantly lessen the impact of the sites. Jim Meadows said they had been told that multiple sites could be located with one transformer, and not even of the size that exists today. Amy Meyer said that what she would need if she were asked to judge a future site would be something as simple as a check list that would include the issues that have been brought up from the audience and from within the Commission. Commissioner Kernan believes the guidelines should be kept in draft form, capable of revision as we learn more, and approach each permit on a case-by-case basis.

Chairman Bartke summed up the Commissioners' ideas on how to rework the guidelines, as follows: 1) The guidelines should talk about the cumulative effect. That is, companies should co-use existing installations or they can't be at that site. 2) The guidelines should speak to maximum height and guywires. 3) The staff will cooperate with the Trust and Point Reyes staff in adopting uniform guidelines. 4) Time limits, permit terms, and grounds for renewal of a permit will be clarified. 5) Companies will switch to new technology when requested and remove the old technology. 6) The guidelines will be in the form of a checklist, so as to be more easily understood.

Superintendent O'Neill promised to get together with the Trust and Point Reyes staff and report at the next meeting.

PRESIDIO TRUST DIRECTOR'S REPORT

Jim Meadows, Executive Director of the Trust, said the RFQ for the Public Health Service hospital had been responded to by 16 different groups of which eight were for the entire complex. The archeological research at the Presidio, a joint effort with the Park Service, is underway, and he invited the Commissioners to come out and take a look. He said the Presidio gate restoration is in progress and the gate has been moved three feet to improve access. The RAB had its first post-Army meeting with the Trust as lead agency. A partnership has been formed with the Alliance to bring a reduction in energy costs to the Presidio. The fire station has been completed and the Fire Department is back in its headquarters and operating as usual. He referred the Commissioners to his printed report.

DIVERSITY COMMITTEE REPORT

Committee Chair Naomi Gray said issues presented at the meeting were a discussion of the Presidio tenants and diversity, a discussion of the workforce profile and diversity issues at GGNRA and Point Reyes, and future goals of the committee.

Chairman Bartke said there was a pending question that needed answering about extending the public comment period on the Vegetation Management Plan. Director Meadows said yes, it would be extended to October 19, 1999.

There being nothing further to come before the Commission, the Chairman adjourned the meeting at 10:05 o'clock p.m.

There were approximately 55 members of the public present.



Responses to Comments in Letter 20

20 - 1

The speaker is referred to Section 4, Environmental Consequences and Appendix A, Revised Environmental Screening Form of the EIS for an evaluation of the impacts of demolishing the LAMC on the natural, social and cultural environment.

20 - 2

Comment noted. Please refer to the master responses 5, 6A, 10A, 10B, and Section 1.2 of the Final EIS.

20 - 3

See the response to comment 5-3.

20 - 4

Please refer directly to letter 54 and corresponding responses for a detailed discussion.

20 - 5

The shortage of housing in the city for low- and moderate-income groups is noted, and the text of the Final EIS has been revised to note the adverse cumulative impact on affordable housing in the city. To limit the demand for affordable units in San Francisco, the Presidio Trust offers reduced rental rates to Presidio employee and tenant households with gross household incomes of less than \$45,000. Please refer to the response to comment 36-23.