



United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94123

IN REPLY REFER TO:

H4217 (GOGA-CRMM)

APR - 4 2008

Mr. Craig Middleton
Executive Director
Presidio Trust
34 Graham St., P.O. Box 29052
San Francisco, CA 94129-0052

Dear Mr. ^{Craig} Middleton:

The National Park Service (NPS) supports your efforts to enliven the Main Post of the Presidio of San Francisco through a variety of new programmatic and facility endeavors. We believe that a blend of museums, accommodations, services and outdoor spaces has the potential to realize a world-class visitor experience, and we applaud your efforts to plan for the future of the Presidio together with interested members of the public through the process of the Main Post Supplementary Environmental Impact Statement.

This letter provides comments for the National Historic Preservation Act Section 106 assessment of effect from the proposed undertaking at the Main Post that includes the following projects: a Museum (new construction), Lodge (new construction), newly constructed addition to the Presidio Theater, demolition, street closure, parking, archeology, Main Post design guidelines and PTMP amendment –Main Post. We support the Presidio Trust's efforts to rehabilitate and revitalize the Main Post Area and to better accommodate public use through the preservation and rehabilitation of historic buildings and associated landscape features consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

Our participation in planning efforts at the Presidio rests in the monitoring and technical assistance responsibilities delegated to the NPS by Congress to help ensure that National Historic Landmarks (NHLs) retain a high degree of integrity and in the Presidio Programmatic Agreement (PA) among the Presidio Trust (Trust), NPS, the Advisory Council on Historic Preservation and the California State Historic Preservation Officer. Golden Gate National Recreation Area (GOGA) signed the PA for the NPS and carries out most of the responsibilities set forth in the Programmatic Agreement. National Historic Landmark monitoring responsibilities are primarily carried out by NPS staff in the Pacific West Regional Office (PWRO). The NPS input into the assessment of effect for the proposed undertaking reflects both the role of NPS set forth in the PA as well as the monitoring responsibilities of the PWRO.

In our December 21, 2007 scoping comments for the Supplemental Environmental Impact Statement (SEIS) that the Trust is currently preparing for this undertaking, we requested that the scale and a variety of locations be fully considered for the proposed new museum and lodge and that the NPS have the opportunity to meet with the Trust as design for the Main Parade moves forward. We understand, from your January 22, 2008 presentation at the PWRO Design Review that we will have an opportunity to further comment on the developing design for the Main Parade and that alternate site locations will be included in the SEIS alternatives analysis. We look forward to reviewing the draft SEIS when it is released.

The Section 106 consultation package that we received from the Trust at the February 26, 2008 consultation meeting shows the proposed new 100,000 sq. ft. museum at the head of the Main Parade Ground on the former site of the Red Cross Building and the bowling alley, with the segment of Arguello Boulevard between Sheridan and Moraga Avenues closed. The 106 documentation also included a massing study of four 3-story new lodge buildings along Anza Avenue, a large addition to the Presidio Theater (Building No. 99) and closure of Bliss Road. Our review comments are based on this packet of 106 consultation information. During the February meeting, we also were shown plans with proposed above-grade parking structures located in the Main Post. We have subsequently been informed that the above ground parking is not currently under consideration; however, we still will address the possibility.

If these projects are constructed as proposed, and the Main Parade is rehabilitated as shown in the Final EA FONSI, the proposed undertaking in aggregate would result in an adverse effect that significantly impacts the integrity of the NHL. Furthermore, when the cumulative effect of the proposed new construction and changes that have already occurred throughout the landmark is assessed, the threat to the status of the NHL is even greater.

The projects as proposed in the current undertaking are not consistent with the Secretary of the Interior's Standards, nor are they in keeping with the Trust's own planning guidelines and cultural landscape analysis for the Main Post. The "District Guidelines" portion of the PTMP Final EIS (FEIS) provides a framework for implementing the PTMP planning principles; subsequent cultural landscape assessments have provided additional analysis to further guide "rehabilitation of existing buildings and landscapes and the select construction of new ones" (p. i, *Principles for the Future: A Cultural Landscape Assessment of the Main Post*). The PTMP FEIS and the *Cultural Landscape Assessment of the Main Post* provide the following guidelines, recommendations and analyses for the Main Post:

Maintain the Main Post as the "heart of the Presidio" through rehabilitation, reuse, and interpretation of historic buildings, open spaces, and archeological resources. Consider **selective placement of compatibly-scaled** [emphasis added] infill construction and/or landscape treatments to strengthen the articulation of the historic open spaces and provide a rich visitor experience. (p. B-1-B-2, Appendix B PTMP FEIS)

The two defined longer edges to the Main Parade were very different in character and scale. The larger scale row of the Montgomery Street barracks presents a more finished, solid front to the western side of the parade, while the more irregular, lower scale buildings on Graham (mostly removed) presented their backs to the parade. (p.32, *Principles for the Future: A Cultural Landscape Assessment of the Main Post, 2002*)

Orient new buildings or structures to reinforce the historic framework and layout of the Main Post. **Scale, massing, height, materials, and color of infill construction must be compatible with the character of adjacent buildings.** [emphasis added] Maximum height should be no more than 30 feet to 45 feet. (p. B-2, Appendix B PTMP FEIS)

Planning Recommendations: Re-establish a historic physical separation (along Graham Street) between Main Parade and the Old Parade to the east; Maintain the treatment of Montgomery Street as a formal front edge facing onto the Main Parade; Maintain the treatment of Anza Avenue as an informal back edge facing onto the Main Parade. . . (p. 34, *Principles for the Future: A Cultural Landscape Assessment of the Main Post, 2002*)

Restore the Main Parade Ground and **reinforce the edges of historic open spaces** [emphasis added] through new design features. (p. B-2, Appendix B PTMP FEIS)

The short ends of the Main Parade . . . have historically been open to the hills to the south and the Bay to the north. (p.30, *Principles for the Future: A Cultural Landscape Assessment of the Main Post, 2002*)

Main Post maximum new construction -- 110,000 sq. ft. (p. 200, PTMP FEIS).

Locating any large-scale building at the head of the Main Parade Ground with the massing, scale, and materials of the proposed museum appears to be in direct conflict with all the above cited PTMP Guidelines, as well as the analysis and recommendations of the cultural landscape assessment. The proposed location, scale, and massing of the lodge are also inconsistent with the first four guidelines, recommendations and analyses. Finally, the total proposed new construction exceeds the FEIS established maximum for new construction by more than 100,000 sq. ft. The end result of these projects and the others included in this undertaking, if they go forward as planned, would be an adverse effect and significant impact to the Presidio that threatens the status of the district as an NHL.

This raises the question of whether the Trust would be living up to the intent of the Presidio Trust Act if planned actions could lead to possible de-designation of the NHL. The question is especially pertinent since the severe impact is avoidable. There are other more appropriate locations where a museum building could be sited on the Main Post or elsewhere in the Presidio that would not require the demolition of historic buildings or violate preservation planning principles and guidelines of the PTMP FEIS. Other aspects of the museum project that seem avoidable are the large scale and massing as well as the seeming lack of consideration for design compatibility. The level of impact for the proposed lodge could be minimized through reduction of the amount of new construction by the rehabilitation of

more existing buildings and greater consideration for maintaining the historically informal edge along Anza Street through redesign of the scale and massing of the lodge's new construction. The proposed closure of Bliss Road and the proposed partial closure of Arguello Boulevard are also avoidable.

CFR Part 36 § 800.10, *Special requirements for protecting National Historic Landmarks (a) Statutory requirement*, states the following:

Section 110(f) of the act requires that the agency official, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to any National Historic Landmark that may be directly and adversely affected by an undertaking.

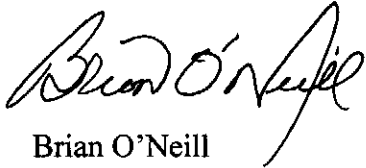
Toward this end, the NPS strongly recommends that the Trust:

- Not construct any large scale buildings or structures at the head of the Main Parade Ground
- Not construct any above ground parking structures in the Main Post
- Reduce the amount of new construction proposed for the Main Post to meet the parameters set forth in the PTMP FEIS
- Locate the new museum in a more appropriate location; sites that we have already suggested in earlier correspondence include the sites of Building 385 and the Commissary as possible alternatives
- Reduce the scale and massing of the new museum so that it does not dominate the historic setting
- Reduce the scale of the proposed new lodging so that it is consistent with the PTMP FEIS guidelines, which identified small-scale lodging as a preferred land use in the Main Post
- Choose designs for the museum and the lodge that are compatible with the character defining features of the buildings and cultural landscape of the NHL District and that are consistent with the Secretary of the Interior's Standards

The NPS is committed to the preservation and rehabilitation of cultural resources at the Presidio in accordance with the Secretary of the Interior's Standards as a means of maintaining the integrity of the NHL District. The integrity of the Main Post is crucial to the overall integrity of the District. As such, and consistent with CFR Part 36 § 65.7 and § 800.10(c) (36 CFR 800), we request continued participation in the Section 106 consultation process. We look forward to our continued discussions. NPS staffs in both the PWRO and at GOGA are available to provide technical assistance as you move forward in this planning process effort.

Please call Paul Scolari, GOGA Historian, at (415) 561-4813 and Dr. Elaine Jackson-Retondo, PWRO, NHL Program Lead, at (510) 817-1428 with any questions or for further coordination.

Sincerely,



Brian O'Neill
General Superintendent

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