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Dear Mr. Middleton:

This letter is written in response to a request for public comments on three draft documents released by the Presidio Trust in February 2009:

1. Revised Draft of the Main Post Update (RDMPU)
2. Supplement to a Draft Supplement Environmental Impact Statement (SDSEIS)
3. Revised Draft Finding of Effect (RDFOE)

In this letter, I also refer to the document, "Section 213 Report: Presidio of San Francisco National Historic Landmark," prepared for the Advisory Council on Historic Preservation by Elaine Jackson-Retondo, National Park Service, Pacific West Region, on April 6, 2009 (Section 213 Report).

The comments in this letter add to, but do not replace, an earlier letter of comment that I submitted on December 12, 2008, in response to the original Draft Supplemental Environmental Impact Statement (Draft SEIS) for the Presidio Trust Management Plan Main Post Update.

I write as a long-term partner of the Presidio Trust's historic and archaeological research and interpretation programs, as a researcher with 16 years of experience conducting archaeological investigations at the Presidio of San Francisco, and as a scholar with broad expertise in the historical archaeology of Spanish colonization. While I am concerned about the broad environmental issues discussed in the above three documents, I will focus my own comments on issues related to archaeological resources at the Presidio of San Francisco.

In February 2009, the RDMPU identified a "Preferred Alternative" for development of the Main Post District of the Presidio of San Francisco. As admitted by the Presidio Trust in the DSEIS and the RDFOE, this preferred alternative would be highly destructive to historic resources, including

archaeological sites and deposits. These include: (1) predicted locations of prehistoric archaeological sites; (2) the known location of the El Presidio site, which is the only surviving record of Spanish-colonial/Mexican era occupation in the Main Post; and (3) substantial American-period (1848-1945) archaeological deposits with high integrity and research value.

In particular, the Preferred Alternative includes two actions – the construction of a new Art Museum and a new Lodge – that would cause disturbance and partial destruction to several known archaeological features, including F:1 (El Presidio Site), F:9, F:20, and F:21. These actions are also located in areas predicted for the discovery of prehistoric sites. The disturbance and partial destruction of these irreplaceable archaeological resources is entirely avoidable. The Presidio Trust has not satisfactorily explained the public need for constructing the lodge and art museum in these specific locations, when existing buildings could be rehabilitated and other construction sites have already been identified within the Presidio of San Francisco for a museum. This, when considered with other impacts to historic buildings, the historic landscape, and traffic and circulation concerns, all indicate that the Presidio Trust needs to substantially redesign several of the projects included in the Preferred Alternative.

I am particularly concerned that the Preferred Alternative would result in disturbance and partial destruction of F:1, known as the El Presidio site. The proposed Museum would impact the western side of the El Presidio site, and as will be discussed in greater detail below, the proposed Lodge may impact the northern extent of the El Presidio site. One of the biggest problems is that the Presidio Trust has not yet carried out investigations that provide sufficient evidence to define the boundaries of the El Presidio site. This, combined with the vague design information provided in the RDMPU and the SDSEIS, make it impossible to assess the extent of the damage that would be caused to the El Presidio site and to other archaeological resources in the Main Post if the Preferred Alternative were to be implemented.

Overall, I would like to express my strong support to two specific recommendations articulated in the Section 213 Report:

- Recommendations 5a and 5b: either (a) site or reduce new construction related to the Museum Project to avoid archaeological sites, or (b) relocate the museum to the Commissary site as identified in the 2002 PTMP.
- Recommendation 6: Reduce the footprint, scale, massing, and height of the proposed lodge.

In the sections below, I outline specific problems and concerns. I have organized these concerns into three categories: A) Conceptual Issues with the Preferred Alternative; B) Archaeological Evidence and Interpretation of Archaeological Evidence in the RDMPU, the SDSEIS, and the RDFOE; and C) Mitigation Measures for Archaeological Resources.

A. CONCEPTUAL PROBLEMS WITH THE PREFERRED ALTERNATIVE AND THE PLANNING PROCESS

A1. What is the funding source for implementing actions listed under Principle 1 of the RDMPU, “Reveal the Presidio’s History” (RDMPU, pg. 22)?

The RDMPU identifies “Principle I” of the implementation plan as “Reveal the Presidio’s History.” (RDMPU pg. 22), and specifies the development of a Heritage Center along with relocation of the Presidio Archaeology Lab, and ongoing archaeological educations, landscape treatments, and educational programs.

The documents released by the Presidio Trust indicate organizations that are sponsoring the costs of the Lodge, the Art Museum, and the Theater Expansion. But there is no organizational sponsorship for the Heritage Center and the Presidio Archaeology Lab.

My concern is that the prominence given to “Revealing the Presidio’s History” could just be window dressing that has been put into the RDMPU to draw attention away from the adverse effects to historic resources that would be caused by implementation of the Preferred Alternative. Without dedicated funding from concrete sources, the Presidio Trust will not be bound to implement this component of the RDMPU.

A2. Inadequate consultation with affected Native American descendent communities.

Throughout the planning process for the Main Post, Native American descendent communities have been neglected. This is reflected even in the historical accounts of the Main Post itself: for example, on pg. 4 of the RDMPU, the section “Evolution of the Main Post” begins with the 1776 arrival of Spanish colonial settlers, neglecting thousands of years of prior use of the area by Native Americans. Similarly, the well-documented presence of large numbers of Native Californian laborers in the Spanish-colonial Mexican Presidio de San Francisco is omitted from all discussions of the El Presidio site. This is particularly egregious as it is highly likely that it was Native Californians who built many of the structures that historically comprised El Presidio. Further, Native Californian Auxiliary Companies trained in the El Presidio Plaza alongside colonial troops, and captured Native Californians were held prisoners in El Presidio’s jail. The presence of Native Californians in the historic Presidio de San Francisco is well-substantiated by both historical and archaeological evidence.

Consultation with Native American individuals and groups was initiated extremely late in the process, long after the Presidio Trust had identified the Preferred Alternative. As indicated on Pg. 200 of the SDSEIS, no Native American individuals or organizations or groups were consulted regarding preparation of the SDSEIS. Pg. 7 of the RDFOE indicates that Native American consultation was not initiated until January 25, 2009 – 2 years into the planning process, and less than a month before the latest round of planning documents were released. The RDFOE indicates only that a letter of notification was sent to a list of Ohlone individuals and groups, and does not indicate what responses have been received or any effort by the Presidio Trust to meet with and conduct meaningful consultations with Native Americans.

The Presidio Trust is particularly in error in only consulting with Ohlone Native Americans. It is important to acknowledge that the Presidio of San Francisco is within the ancestral territory of the Ohlone Indians, who were most directly affected the 1776 establishment of El Presidio de San Francisco and the religious and military colonization program that the Presidio conducted in the region.

In addition to the Ohlone, many other Native Californian communities have historical relationships with the Presidio of San Francisco, particularly the Main Post. The National Park Service, Golden Gate National Recreation Area, and its consultants, have prepared a comprehensive study of Native American history in the GGNRA, including the Presidio of San Francisco NHLD:

Milliken, R., L. E. Shoup, et al. (2005). The Historic Indian People of California's San Francisco Peninsula. Report, Prepared for the National Park Service, Golden Gate National Recreation Area, San Francisco, California, by Archaeological Consulting Services, Oakland, California.

This study shows that along with the Ohlone, Native Americans historically present at the Presidio of San Francisco include members of Patwin, Wappo, Bay Miwok, Coast Miwok, Eastern Miwok, Pomo, and Yokuts cultural and language groups. The Presidio Trust should expand its Native American consultation program for the Main Post to include *all* Native American groups whose heritage is connected with the Main Post, prehistoric and historic.

A3. Use of El Presidio archaeological site for parking.

As outlined in the RDMPU, parking and traffic patterns in the Preferred Alternative would prevent long-term interpretation and research at the site of El Presidio de San Francisco. The RDMPU identifies the historic plaza of El Presidio as the site of 75 planned parking spaces. Based on general planning standards that estimate 275-300 square feet per open air parking space, **these 75 parking spaces would occupy between 20,620 to 22,500 square feet of the El Presidio plaza.**

It's disturbing that throughout the environmental and planning documents, the extent of parking planned for the El Presidio site is minimized. Conceptual illustrations of public interpretation of the El Presidio site never show the parking areas being planned for the El Presidio Plaza. For example, in the RDMPU, illustrations on pgs. 29 and 33 imply the closure of Mesa Street and no parking is depicted on the surface of El Presidio. Text in the SDSEIS simply states that "Some parking would continue to be provided on El Presidio" (pg. S-9). It is only on pg. 44 of the RDMPU that the full extent of planned parking is revealed. This information is embedded in a larger table concerning the overall distribution of planning, and the effects of parking on long-term interpretation of the El Presidio site are never discussed.

If the Presidio Trust were truly following "Principle I: Reveal the Presidio's History" stated in the RDMPU, they would not be planning to use the El Presidio plaza site for over 20,000 square feet of parking spaces. Ironically, the Presidio Trust justifies the removal of historic structures Building 40 and 41 by arguing that their removal is necessary to interpret the El Presidio Plaza. But these two historic buildings, which are contributing elements to the Presidio of San Francisco NHLD, each cover an area of only 4410 square feet per building, or a total of 8820 square feet. That's only a third of the area that the Presidio Trust proposes to dedicate to parking within the El Presidio plaza. The Presidio Trust is prioritizing parking – a non-historic use – over protection of significant historic resources.

Any management plan for the Main Post should remove all parking from the historic plaza of El Presidio to facilitate research, preservation, and public interpretation of this significant archaeological resource. The SDSEIS supports this, stating that on pg. 122 that "The retention of parking on El Presidio would continue to diminish the ability to interpret the colonial period at the Presidio."

B. ARCHAEOLOGICAL EVIDENCE AND INTERPRETATION OF ARCHAEOLOGICAL EVIDENCE

B1. Boundaries of the El Presidio archaeological site

In the documents listed above, the Presidio Trust uses a boundary for the El Presidio site (F:1) that is taken from a 2008 draft National Historical Landmark District Update being prepared by the National Park Service. The fact that the Presidio Trust is drawing their information from a draft document under development by another agency is itself a concern: the Presidio Trust has the primary responsibility for managing cultural resources in the Main Post, and while cooperation with the National Park Service is essential and beneficial, the Presidio Trust cannot rely on interim NPS documents for its own planning purposes.

Neither the Presidio Trust nor the National Park Service has ever conducted investigations that are sufficient to define the boundaries of the El Presidio archaeological site. Hence, while the Presidio Trust claims in its planning documents for the Main Post that the Preferred Alternative includes modifications designed to avoid the northern and western extents of the El Presidio archaeological site, no archaeological evidence has been provided to substantiate that claim. This is reflected in the SDSEIS, which states, “a uniform boundary for El Presidio is very difficult to define” (pg. 120).

Because the full extent of the El Presidio site is unknown, the impact of the Preferred Alternative on this unique archaeological resource cannot be fully assessed. What is known is that the proposed site for the Art Museum overlaps with the known western extent of F:1, and the proposed Lodge is in extremely close proximity to it.

B.1.a. Relationship of the Lodge to the El Presidio site

With regard to the potential impacts that could be caused by construction of the Lodge, the Presidio Trust has misinterpreted archaeological data from two technical reports: Voss 1999 and Meyer 2008. On pg. 120 of the SDSEIS, these two reports are cited as indications that colonial period artifacts recovered in areas outside the area identified for El Presidio in the 1993 and 2008 NHL updates are “isolated artifacts mixed with later historic features (Meyer 2008) or with clearly modern debris (Voss 1999).”

The Voss 1999 study, which I directed in 1997-1998, was a shovel probe survey that included shallow manual probes, spaced at 30-foot increments, in the area identified in these planning documents as the “Old Parade.” The shovel probe survey did find that **near-surface** Spanish-colonial/Mexican era deposits in “Old Parade” had been disturbed by installation of a subsurface lawn irrigation system. However, the probes extended no deeper than 24 inches; for this reason, the findings of the shovel probe survey cannot be used to assess the presence or absence of intact Spanish-colonial/Mexican deposits related the El Presidio site below a depth of 24 inches. Deeply buried Spanish-colonial/Mexican archaeological features with a high degree of integrity have been found throughout the Main Post and in the Tennessee Hollow Watershed valley floor. Near-surface disturbance has not been an accurate predictor of the integrity of more deeply buried archaeological resources.

Regarding the Meyer 2008 study, I have read the technical report in detail and also talked with the author shortly after he concluded the field investigations that are documented in the technical report. The findings of Meyer 2008 directly contradict the interpretation of that report that is presented in the SDSEIS. In fact, in his letter report to the Presidio Trust on May 8, 2008, Meyer concludes that the

excavations in the proposed Lodge site show that the location for the proposed Lodge contains a variety of important archaeological deposits from the Spanish through the American military occupations. Meyer 2008 further states that the entire parcel is archaeologically sensitive and requires further investigation to assess the presence/absence and integrity of specific archaeological features.

In summary, neither the Voss 1999 nor the Meyers 2008 reports support the Presidio Trust's conclusion that the Lodge site is located outside of the El Presidio site (F:1). Both studies found Spanish colonial/Mexican era artifacts within or adjacent to the proposed site of the Lodge. Neither study is adequate to assess the presence/absence or integrity of Spanish-colonial/Mexican archaeological resources within the area that would be affected by construction of the Proposed Lodge.

B.1.b Relationship of the proposed Art Museum to the El Presidio site

With regards to the relationship between the El Presidio site and the proposed Art Museum, the same general concern about lack of sufficient investigation to determine site boundaries applies. The RDMPU, the SDSEIS, and the RDOE all draw a distinction between F:16 (Stream Ravine Dump) and F:1 (El Presidio de San Francisco). This distinction is problematic – spatially, the two sites are continuous and overlapping. Spanish colonial materials have been found by the Presidio Trust's consultants in areas of F:16, further indicating that the boundary of F:1 may extend even further into the area currently marked as F:16.

The functional designation of F:16 as a "Stream Ravine Dump" overreaches the available evidence. While it is known that the stream ravine was used as a dump site during the American period, we do not have either archaeological or historical evidence of the use of the area during the Spanish-colonial/Mexican period. For example, portions of the Tennessee Hollow Watershed, the drainage network located immediately east of the El Presidio site, was used as a residential, agricultural, water management, and transportation corridor prior to American-period dumping and infill throughout much of the watershed.

Thus, the statement that the Art Museum "will be sited west of Building 386 to avoid ground disturbance within the El Presidio archaeological zone" (RDMPU, pg. 38) is not based on any concrete evidence, because the western extent of the El Presidio archaeological site has not been determined.

In the past two years, the Presidio Trust has retained archaeological consultants to conduct geoprobe core testing in the region proposed for construction of the Art Museum. Geoprobe core testing is adequate for characterizing general geological layers but does not provide sufficient evidence for assessing the presence/absence of archaeological features and deposits. This is for two reasons: (1) the geoprobe cores are only 2" in diameter, and thus would only detect high-density deposits in which artifacts are *evenly* distributed at a density of 85-90 artifacts per cubic foot or greater in the specific location being tested; and (2) the geoprobe cores were placed along single transects rather than a regular grid or randomized sample, which makes it impossible to calculate the minimum size of the archaeological feature that would be detected by the geoprobe core testing program.¹

¹ Comparative evaluation of methodologies used to identify archaeological sites through shovel probes and other point-specific boring is discussed in the following studies:
Lightfoot, K. G. (1986). "Regional Surveys in the Eastern United States: The Strengths and Weaknesses of Implementing Subsurface Testing Programs." *American Antiquity* 51(3): 484-504.

The February 2009 environmental and planning documents use the geoprobe core testing results to address two concerns: the likelihood of prehistoric archaeological resources at the Museum site, and the likelihood of historic archaeological resources at the Museum site. Regarding prehistoric sites, the SDSEIS states that "Given the lack of evidence however, it is doubtful that a large prehistoric feature, such as a shell mound, was missed" (SDSEIS pg. 117). This is a misinterpretation of the available information. It is the *density* of an archaeological feature, and the evenness of the internal distribution of the feature's constituent components, not its size, that determines whether the feature would be detected by geoprobe core testing. Inland prehistoric archaeological sites in the San Francisco Bay region often do not contain high densities of shell because shells were often removed at the site where marine resources were harvested. The distinctive stratigraphic indicators that signal the presence of a shell mound would not be expected at an inland location such as the site of the proposed Museum, and the absence of shell midden deposits in the cores is not sufficient evidence to conclude that a large prehistoric feature is not present.

Regarding historic archaeological features, the fact that many of the geoprobe test cores excavated in 2008 by the Presidio Trust's consultants is strong indication that historic archaeological features from the Spanish-colonial, Mexican, and American periods are present within the footprint of the museum proposed under the Preferred Alternative. However because of the issues related to artifact density, artifact distribution, and feature size noted above, the geoprobe core testing data neither confirm nor disprove the possibility that the El Presidio site extends into the area proposed for construction of the Museum.

I am particularly concerned that the misinterpretation of archaeological evidence from the areas proposed for construction of the Museum misleads the public and keeps the public from being able to comment on the impact of Museum construction on the El Presidio site. For example, the Presidio Trust's map of the archaeological testing program is deceptive and misleads the public regarding the extent of testing conducted in the areas that would be affected by the Preferred Alternative. SDSEIS Figure 20 (also RDFOE Figure J), "Cut/Fill Map with Locations of Archaeological Testing" shows the actual dimensions of trenches excavated within the Lodge area. But in the Museum area, the cores themselves are represented by numbered circles, which, following the legend of the same map, are depicted as measuring 15 *feet* in diameter. In actuality, the technical reports submitted by the Presidio Trust's archaeological consultants indicate that the geoprobe cores were a mere 2 *inches* in diameter. This graphic misrepresentation misleads the public into the impression that archaeological testing at the site of the proposed museum was more extensive than it has been.

In summary, the Presidio Trust's presentation of findings from the geoprobe core testing program is at odds with the original reports submitted by the Presidio Trust's consultants. These original reports clearly state that the geoprobe core testing pattern used in the area of the proposed Museum cannot determine the presence/absence or integrity of archaeological resources.

Nance, J. D. and B. F. Ball (1986). "No Surprises? The Reliability and Validity of Test Pit Sampling." American Antiquity 51(3): 457-483.

Shott, M. J. (1986). "Shovel-Test Sampling in Archaeological Survey: Comments on Nance and Ball, and Lightfoot." American Antiquity 54(2): 396-404.

B.1.c. Conclusion

I appreciate the efforts that the Presidio Trust has made to reduce impacts to the El Presidio Site that would be caused by construction of the Museum and the Lodge. In this regard, the Preferred Alternative articulated in the February 2009 documents is an improvement over the Proposed Action identified in earlier documents. However, both construction projects will still result in substantial loss of known archaeological resources. Furthermore, the boundaries of the El Presidio site and of other archaeological resources have not been determined through archaeological testing and as a consequence, the full impact of the Preferred Alternative on known and predicted archaeological resources cannot be assessed.

If the Presidio Trust is not willing to conduct sufficient field studies to determine the boundaries of the El Presidio site, it should be assumed that the Lodge and the Museum would adversely affect the El Presidio archaeological site.

Impacts to archaeological resources can be fully avoided by using existing buildings for the Lodge and the Museum, or by locating new construction in areas that are not within or proximal to known archaeological resources.

B.2 Planning and Environmental Documents produced by the Presidio Trust consistently minimize and understate the impact of the Preferred Alternative to Historic Resources, including archaeological resources.

Alongside specific issues related to the El Presidio archaeological site boundary, the documents released in February 2009 consistently minimize and understate the impact of the Preferred Alternative to historic resources, including archaeological resources. These documents contain conflicting statements that confuse the public as to the overall impact of the Preferred Alternative to specific resources and to the Presidio NHLD as a whole.

For example, the SDSEIS states that “The general pattern of land use within the Main Post district would not change from existing conditions under the preferred alternative” (SDSEIS pg. S-5), and that “New construction under the preferred alternative would have adverse effects to individual historic resources, but not to the NHLD” (SDSEIS pg. S-9). But in the same document, the SDSEIS states that cumulative impacts on historic and archaeological resources would be substantial (SDSEIS pg. S-12). The RDFOE further states that “The collective changes to the cultural landscape from these projects, analyzed in prior compliance actions, in addition to the proposed undertaking, would result in a cumulative adverse effect” (RDFOE pg. 89) and that “the undertaking would result in a direct effect to the NHLD, as well as to several of its contributing resources... and would result in an overall cumulative adverse effect to the NHLD” (RDFOE pg. 91).

This confirms the evaluation presented in the Section 213 Report that “The cumulative impact of these adverse effects severely diminishes the historic character of the Main Post, which is the heart of the Presidio of San Francisco, and significantly diminishes the overall integrity of the National Historic Landmark District.” (Section 213 Report, pg. ii); and that “Implementing the entire suite of projects proposed in the current undertaking and the additional projects described above, will seriously threaten the integrity of the Main Post, the historic core of the National Historic Landmark District, to a degree that cannot be mitigated to an acceptable level, which would significantly diminish the integrity of the Presidio of San Francisco National Historic District” (Section 213 Report, pgs. Iv-v).

It is incumbent upon the Presidio Trust to be consistent in presenting the findings of environmental assessment to the public, and to not present contradictory statements within the same document and across documents.

C. MITIGATION MEASURES FOR ARCHAEOLOGICAL RESOURCES

The SDSEIS outlines the mitigation measures the Presidio Trust would adopt to avoid or mitigate adverse effects to archaeological resources. In this final section of this letter of comment, I outline my concerns about the approach the Presidio Trust is taking to archaeological mitigation.

C.1 Significance Criteria

Mitigation measures need to address the specific criteria that make a resource eligible for listing on the National Register of Historic Places. The SDSEIS generally assumes that archaeological resources that may be affected by the Preferred Alternative are eligible under Criterion D. Along these lines, the mitigation measures identified by the Presidio Trust (SDSEIS pg. 123-125) focus on either avoidance or recovery of information from archaeological resources that may be disturbed or destroyed by actions taken under the Preferred Alternative.

Mitigation measures geared towards data recovery are not by themselves sufficient for archaeological resources that are eligible for listing on the National Register of Historic Places under Criteria A, B, or C. As stated in the RDFOE, historic properties in the Main Post are generally considered eligible under NRHP criteria A, C, and D (RDFOE, pg. 3). Additionally, the SDSEIS states that archaeological features in the Main Post are currently being evaluated by the NPS for significance under Criterion A (SDSEIS, pg. 112).

The Presidio Trust should evaluate each known and predicted archaeological feature that may be affected by the Preferred Alternative with regard to *all* the NRHP criteria, and develop mitigation measures as appropriate.

C.2 Mitigation Measure AR-1: “Avoidance” (SDSEIS pg. 123)

Although the Presidio Trust states that its first priority for mitigation will be avoidance of adverse effects, earlier segments of the SDSEIS clearly state that archaeological features **will** be adversely affected by the Lodge and Museum identified in the Preferred Alternative. If the Presidio Trust is serious about avoiding adverse effects to archaeological sites, it should more aggressively pursue reuse of existing structures and identification of construction sites that are not located within or in close proximity to known archaeological resources.

C.3. Mitigation Measure AR-5: “Alternative or Creative Mitigation”

The Presidio Trust is concerned that data recovery to mitigate adverse effects on F:1 and F:20 “may result in significant expenditures because of the depth at which those resources are to be found. Much of the expenditure may be spent on engineering a safe archaeological excavation prior to construction or intermittently halting construction to recovery archaeological data” (SDSEIS, pg. 124).

I have three concerns about this approach. First, it is now increasingly common to conduct archaeological data recovery at deeply buried sites; there are good examples in San Francisco and

throughout the surrounding area (such as the West Oakland project) where solid planning and phasing of data recovery and construction has resulted in positive synergistic results. Measure AR-5 creates a bad loophole that would allow the Presidio Trust to expedite construction activity at the expense of archaeological resources. I would like the Presidio Trust to commit to a proactive planning process for new construction in archaeologically sensitive areas that acknowledges the likelihood of encountering deeply buried archaeological resources and plans accordingly for that likelihood.

My second concern is that “Alternative or Creative Mitigation” may result in the destruction of **unique** archaeological resources that could provide particularly important sources of data about prehistoric and historic life at the Main Post.

For example, reports from the geoprobe core testing state that fabric was among the historic period artifacts recovered from the tests (SDSEIS, pg. 117). To my knowledge, this is the first case that historic fabric has been recovered in excavations at the Main Post of the Presidio of San Francisco. The presence of fabric, which usually decomposes rapidly in subsurface deposits, could indicate that the subsurface area that would be impacted by Museum construction has unusual attributes (for example, an anaerobic environment) that may have led to the preservation of other organic materials not otherwise preserved throughout the Main Post.

Similarly, if prehistoric archaeological resources were discovered in the Main Post, it would be the first inland prehistoric site discovered within the Presidio of San Francisco NHL. Such a resource, if encountered, would provide a unique opportunity to investigate and commemorate the use of the Presidio of San Francisco by Native Americans prior to the arrival of European colonists.

For both prehistoric and historic resources, “alternative mitigation” could lead to the loss of unique and incomparable archaeological resources that provide entirely new and unparalleled sources of information about the history of the Presidio of San Francisco.

Discussion of “alternative or creative mitigation” should include clear criteria that would determine when a resource could be mitigated through “alternative” measures rather than data recovery. For example, sufficient assessment and sampling of the archaeological feature or deposit should be undertaken to assess whether the resource is a unique source of information about the past, or whether the resource is similar with other known archaeological deposits.

My third concern is that AR-5, “Alternative or Creative Mitigation,” states that alternative mitigation should be used in cases “with more funds going into engineering or compensating the project proponent than into the recovery of significant archaeological data” (SDSEIS, pg. 124). What, exactly, are the circumstances in which the Presidio Trust would “compensate the project proponent”? Shouldn’t the project proponent, whose actions would be causing the disturbance or destruction of archaeological resources, be underwriting mitigation measures made necessary by the project proponent’s actions?

This language in the SDSEIS points to a larger problem: it is clear that the Presidio Trust is nervous about the costs associated with archaeological mitigation and is not willing to bear those costs itself nor hold its project proponents responsible for those costs. If the cost of mitigation is too great, then the project should be redesigned for avoidance. Under no circumstances should monies earmarked for mitigation be used to “compensate” a project proponent.

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In my long experience working closely with the Presidio Trust, I have developed a great respect for many of the people who work for the agency and who are working very hard, day in and day out, to protect and preserve this great National Park and National Historic Landmark District. Thank you for this opportunity to comment on the Preferred Alternative and supporting documentation.

Sincerely,

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