

June 1, 2009

David Grubb, Chairman, Presidio Trust Board of Directors  
Craig Middleton, Executive Director, Presidio Trust  
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Dear Sirs,

DAPE (Descendants of Anza and Portolá Expeditions) strongly disagrees with the Presidio Trust that issues raised regarding the Trust's proposals are ready for resolution. The public comment period for the draft MPU, SEIS, and FOE should not end on June 1, 2009. Despite almost two years of public questions, corrective comments, and protests, the documents remain confusing and inadequate. The Presidio Trust has acknowledged the value of the public's input and claimed to have changed its proposals as a result. Unfortunately the changes do not repair the fundamental errors in the Presidio Trust's proposals. The Presidio Trust's listening has evidently been selective, ignoring major concerns about the legality, desirability, and wisdom of its actions.

The Presidio Historical Association (PHA) has documented this in its current and prior comments. The members of DAPE concur with PHA's statements and incorporate them by reference in this document.

#### **BASIC PRINCIPLES**

The National Park System exists to preserve places of nationally significant natural and historic importance. A reasonable person with even slight knowledge of the San Francisco Presidio would correctly expect on visiting this National Park to experience its natural beauty. The same person with a slight knowledge of its rich history would expect to view a place reflecting a military culture and history. This visitor to the San Francisco Presidio would view with approval the rehabilitated and restored historic buildings.

Fifteen years after the incorporation of the San Francisco Presidio into the National Park System, a reasonable person would expect to visit facilities dedicated to informing the public about that history. In this last expectation, the person would be frustrated.

The reasonable person would perhaps be disturbed that many of the historic buildings of a National Park are used for private residential or commercial office space for rent or lease, but calmed by the explanation of the requirement for financial self sufficiency by the year 2013, which justifies the adaptive reuse and small amount of new construction in the Main Post. This person would observe that even the most ambitious project to date, the Disney Family Museum, is contained within the exterior shell of a historic building whose internal integrity had reportedly been destroyed. All of this could be accepted.

#### **THE PRESIDIO TRUST'S BASIC ERROR**

Now the Presidio Trust proposes radical alteration of the past and existing natural, historical and cultural environments, destroying the integrity of the Main Post with construction of a contemporary art museum, a lodge, restaurant, expansion of the theater, and other proposals. The visitor would certainly find the clutter of additions and alterations filling in open spaces to be visually dissonant with the simple and severe

beauty of the current Main Post.

This exposes the most obvious and primary objection to the Presidio Trust's proposals, that the visitor's experience of this National Park will be irrevocably altered and harmed by the loss of integrity triggered by inappropriate changes in the Main Post cultural landscape. Of the seven aspects of integrity, location, design, setting, materials, workmanship, feeling and association, the last two, feeling and association, would be destroyed. The change of identity from a military installation to an urbanized mall would diminish its significance.

The concept that facilities for contemporary art and film as art can be introduced or substituted into the Presidio as cultural elements is false. Construction to support these activities, unrelated to the history and culture of the SF Presidio, would displace or constrain future appropriate rehabilitation or development.

The Presidio Trust has attempted to mislead the public by inappropriate use of the terms "culture" and "cultural center" as referring to aesthetic or intellectual pursuits. The uses of the terms in the context of the founding acts and National Park System regulations are clear. Culture refers to the characteristic features of a society or civilization.

### **DAPE'S OBJECTIONS**

Members of the Descendants of Anza and Portolá Expeditions (DAPE) are Californios, descendants of Spanish and Mexican settlers in Alta California, and historians with expertise in that period. Many of us have ancestors who discovered the San Francisco Bay with Portolá in 1769 and established El Real Presidio de San Francisco as members of the Anza expedition in 1776. Some of those ancestors were buried at the San Francisco Presidio.

Many of our parents, grand parents, and previous ancestors were subjected to anti-Hispanic racism. We have been aware all our lives that many non-Hispanic Californians chose to believe that the history of California began in 1849. We know that many Indigenous Californians after 1848 claimed Hispanic descent to avoid theft of their land and harm to their persons. We know that most of us are descendants of mixed race who formed a society in Alta California in which race mattered very little. We are proud of our families' histories in California, some extending more than 230 years. Our families assimilated into the Yanqui culture, many serving in the United States military. All of us are proud to be citizens of the United States.

Proposals of the MPU altering the character of the Main Post with the FOE's understatement of adverse effects and suggestions that they are mitigable are an insult to our under-appreciated heritage and the true history of California and our nation. These proposals threaten to disturb unlocated graves of our ancestors. As descendants we can look from the Officer's Club to the San Francisco Bay and envision our ancestors standing in the same place. Our sense of feeling and association will be destroyed by these proposals.

The Presidio Trust acknowledges that its proposals for development of the Main Post will have adverse effects but the Trust's statements seek to minimize the effects and suggest they are mitigable. This is infuriating to those of us who regard this as sacred ground. We are similarly upset at the disrespect for later military history. As we have stated previously, no one would consider these proposals at Jamestown or Williamsburg.

Although there are educated, talented, and good people on the Presidio Trust staff, there is no one with the expertise to adequately interpret the period prior to the United States Army occupancy. The archaeology staff comes closest. However, members of that staff have insufficient knowledge of the Spanish language, 18<sup>th</sup> and 19<sup>th</sup> century Spanish, Mexican, and California history, or of the culture of the Californios, including burial practices. No one on that staff appears to have been aware that the Mission Dolores death records (difuntos) begin in 1776 with a burial in the chapel of the San Francisco Presidio. The next two burials occurred in 1777 at the Presidio.

Other burials of both Spanish and Native Americans at the Presidio are recorded in mission records. One Indian burial at the San Francisco Presidio is recorded in the death records of Mission San Gabriel. Members of the SF Presidio archaeology staff have stated that no human remains have been found at the Presidio except for a pre-historic burial at Crissy Field. Since records of burials exist, there should be an increased sensitivity to the archaeological resource rather than the minimalization required to promote the proposals for new construction in the Main Post.

Although the NHLD registration documents and others state that extensive archaeological investigation would be required in the future, that effort is nowhere near completion. When directly asked, a member of the archaeology staff truthfully reported that language in the matrix of effects was inserted by others to claim that the potential lodging site was of diminished archaeological importance because other sites from that era existed. This and other behavior by the Presidio Trust suggests that the archaeological resource will potentially be sacrificed to the proposed new construction. Suggestions that the adverse effects can be mitigated are false.

The Presidio Trust publicizes plans to surface mark the foundations of the original Spanish Presidio. There were at least two configurations of the Presidio quadrangle. It is not credible that this can be accomplished soon.

The February 2009 FOE lists only one source for the Hispanic period in its archival search of the Presidio's history, Langelier and Rosen's *El Presidio de San Francisco; A History Under Spain and Mexico, 1776-1846*, (1992), a document of 137 pages which can only be called a good beginning.

The protection of the archaeological resource demands that the Presidio Trust's proposals be abandoned.

#### **OTHER ERRORS OF THE PRESIDIO TRUST**

The Presidio Historical Association has documented many illegalities, procedural errors, and faulty concepts in its comments. We incorporate them by reference.

There is an additional procedural reason that public comment period for the draft MPU, SEIS, and FOE should not end on June 1, 2009. 40 CFR 1502.8 states that *Environmental impact statements shall be written in plain language and may use appropriate graphics so that decision makers and the public can readily understand them*. This requirement for comprehensibility must extend beyond using simple words to expressing clear thinking, and exclude the use of illogical statements which prevent understanding. Very few of the public's questions asked at public meetings and in the 106 consultation have been satisfactorily answered. Until this clarity is approached, the Presidio Trust will not have met this requirement.

We pointed out in a 106 consultation and reiterate the requirement of 40 CFR 1501.7 (c), “An agency shall revise the (scoping) determinations made under paragraphs (a) and (b) of this section if substantial changes are made later in the proposed action, or if significant new circumstances or information arise which bear on the proposal or its impacts.” Many changes and additions have been made since the close of scoping in 2007 without any evident revisiting of the scoping process.

Further evidence that the public is more informed than the Presidio Trust as to the issues may be found in the transcript of the traffic workshop where answers to many questions were deferred to some later time.

### **WHAT SHOULD BE THERE?**

The Presidio Trust has dominated communications with its advocacy for the proposals and stifled discussion of alternatives. The following suggestions should be sufficient uses for all historic buildings in the Presidio including those in Fort Winfield Scott. These suggestions were derived from answering the question, “What changes would be permissible, beneficial, and in keeping with the natural and cultural environment?”

The configuration of buildings and open space as it existed at the establishment of the National Historic Landmark District in 1994 should be maintained without the introduction of new thematic elements inconsistent with the past.

The rich 230 year history of the Presidio provides many themes for engaging and educating the public about the development the Western United States and the international relations with Pacific Rim countries. Multiple museums could explore the natural history of the area, the indigenous Ohlone and others, the European explorations of the Pacific, the founding of the Presidio in 1776, and the shift from Spanish/Mexican culture to that of the United States.

The elements of the Presidio Historical Association’s proposal for a History Center for the Golden Gate should be implemented as a first step with subsequent creation of other individual exhibits and interpretation centers in existing historic buildings.

The Main Post area and the rest of the SF Presidio has the potential to arouse interest in the history of the Western United States and our nation’s involvement with the Pacific.

The Main Parade Ground should be maintained as an uncluttered open space, unrestricted by encroaching new construction, to evoke the military culture represented by a parade ground.

The period of significance should be increased to include the entire military occupancy, including the Cold War, ending with the decommissioning of the SF Presidio and exit of the Sixth Army, providing rich and more recent subjects for interpretation. As complex problems must be solved in any military organization, subjects such as ballistics, logistics, or even base decommissioning could be interpreted.

Exhibits should be located through out the Presidio but with a concentration in the remaining space available in the Main Post Area, particularly the Montgomery St Barracks. Static exhibits of historic artifacts (uniforms, arms, tools) could be supplemented with changeable and interactive computer based displays including war-games software to interpret the history and alternative decision-based possibilities.

A credible plan to interpret the history of the San Francisco Presidio could result in raising of funds from new sources for renovation and rehabilitation. Admission fees and

particularly charges for war games could bring in sustaining revenue.

Focus on the history will benefit San Francisco, as well as the nation. History based tourism is a very popular and sustainable source of income for surrounding areas.

The natural environment of the Presidio should also be featured. Exhibits about the native flora and fauna, climatology, and oceanography, with explanations of the ecological impacts of different cultures and events would be ideally suited to this setting.

All these would fulfill the purpose of the park as they interest and inform the public.

### **WHAT SHOULD BE DONE?**

The Presidio Trust should suspend its advocacy or, better yet, withdraw its support for the proposals. A restart of a valid planning process with demonstrated and legitimate purpose and need leading to appropriate land uses furthering the mandated goals of the Presidio park is necessary.

The aid of major scholars specializing in the periods of history represented at the Presidio should be enlisted to study and document the Presidio's role in the development of the Western United States and our modern nation. No physical alteration of the Presidio that is not temporary and easily reversed should be contemplated without a prior sustained and productive study of the Presidio.

This letter is written with a great deal of sadness and disillusionment at its necessity. Since the first newspaper accounts published in 2007 of the Presidio Trust's advocacy for a contemporary art museum in the Main Post, many have tried to make you aware of the mistaken course you have chosen. We hope that among the many comments you receive you find something that persuades you to return to the principles and spirit of the National Park System.

Sincerely yours,

Boyd de Larios  
Representing DAPE (Descendants of Anza and Portolá Expeditions)