



IN THE END, A SOCIETY IS DEFINED NOT ONLY BY WHAT IT CREATES, BUT BY WHAT IT REFUSES TO DESTROY.

-- John Sawhill; Former President, New York University and Former CEO, The Nature Conservancy

May 29, 2009

Mr. Craig Middleton, Executive Director &
Acting Federal Preservation Officer
The Presidio Trust
34 Graham Street
P. O. Box 29052
San Francisco, CA 94129-0052

Subject: Finding of Effect for the Supplemental Draft Supplement to the Master Plan Update
and the Supplemental Draft Supplemental Environmental Impact Statement

Dear Mr. Middleton:

Again, we appreciate the opportunity to comment on the NHPA Sec. 106 process for the Presidio Main Post Master Plan Revision in its latest form. Since this is the last time we will be commenting on the proposed undertaking, we want to acknowledge all the effort and skill which has been expended by so many on these documents, and apologize for concentrating only on the documents' deficiencies rather than appreciating the many improvements. Please believe that this is in the interest of time and efficiency for both the writers and readers of this document! We ask only that you take them into account and include them as comments on the SDSEIS as well, since they should inform the historic resource section of the NEPA documents.

After reviewing the most recent FOE and the Main Post Update, we find that, in spite of the changes, many of the same issues and difficulties are still present in the new documents. Because of this we believe that the explanation lies in not in the execution, the hard work and creativity, but at the level of the concepts themselves. The basic approach and operative concepts (at least for the new construction) are such, and potential loss to the historic values is still so great as to threaten the status of the Presidio's National Historic Landmark District (NHLD).

This opinion is confirmed by the evaluation of the FOE in the National Park Service 213 Report, which confirmation only increases our concern. The adverse effect on the NHLD by the proposed undertaking as a whole, and some of its components if done separately, no matter how designed nor how skillfully presented will be severe and could be fatal to the designation and to the National Park.

We are distressed to find, notwithstanding many letters from us on the subject, that the design guidelines (now called “Strategies for Conforming to the Secretary of the Interior’s Standards”) are still not in compliance with the Standards. Following is an explanation of the major problems with the project concepts described in both documents that still remain to be solved. We attempt to suggest some possible ways to solve them.

I Inappropriate Uses are Proposed

A fundamental difficulty with both the project and process is the Presidio Trust's inability to utilize the Secretary of the Interior's Standards correctly. The Secretary's Standards are additive, starting with #1. Standard #1 relates to appropriate use and states, "**A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.**" The two most intrusive proposals, the hotel and the art museum, do not meet this Standard. Because the Standards are additive and these elements of the current undertaking will cause a major change to “features spaces and spatial relationship”, they fail on this first, most basic Standard. By failing to adhere to Standard #1, the Undertaking automatically fails to comply with the other nine standards. As a result, it is almost unnecessary to evaluate it against the other nine Standards. No project should be undertaken which does not meet Standard #1.

The buildings proposed would neither be allowed by the current Presidio Trust Management Plan (PTMP) nor by the Presidio Trust’s own current Design Guidelines applicable to the Main Post. Nor would they ever be permitted in a National Park if it were administered by the National Park Service.

We reiterate our statement in our letter of a year ago:

“They [the buildings] also appear to be inconsistent with the policies expressed in the Presidio Trust legislation, which policies have been interpreted by the Trust itself in its own Mission Statement.”

II Failure to Follow Applicable Guidance of Prudent Planning Principles

The Presidio Trust continues to do its planning in an after-the-fact manner. Whether this is because it isn’t getting good preservation advice, or because it is ignoring the good advice it receives is not clear. If the former, this problem might be alleviated by the Presidio Trust’s hiring a qualified Federal Preservation Officer with a minimum of five years experience, as required by the Presidio Trust’s original Programmatic Agreement. If the latter, the Presidio Trust should consider restarting the process after undertaking (with public participation) a process of Preservation Planning for the Presidio.

Since the PTMP was completed in 2002, it appears that goals have changed for the Presidio without this process being undertaken. Any plan for the Presidio should grow out of the history and historic resources present in the NHLD rather than be based on goals which destroy or transform them. A planning process which attempts to integrate arbitrary new functions is jeopardizing the National Historic Landmark District should be reconsidered and abandoned.

The completion of a Cultural Landscape Report and Cultural Landscape Inventory for the NHLD is the best way to begin the planning process and inform not only the public, but the Presidio Trust Staff.

III Demolition of Contributing Historic Structures, Buildings and Elements

The current Undertaking continues to call for the demolition of several historic structures that contribute to the NHLD. These losses could and should be avoided. While we would ordinarily confine our comments to the official documents actually presented for review, it has been impossible not to observe some disturbing changes in the evolving design of the Art Museum that has been presented to the public separately.

Building 97, a building which is a contributor to the district, is shown as demolished in the current architect's drawings for the Museum (whose detailed design is not included in the documents being reviewed herein) although the undertaking documents call for it to be moved. Moving it will cause the building to lose historic integrity, but demolishing it is worse. Neither is necessary. Building 97, the Red Cross Building, should be retained, and should not be moved.

However a more disturbing interpretation could be made from this inconsistency between the Preferred Alternative and the current museum architect's drawings: It suggests there is a major disconnect between the preservation advice the Presidio Trust is receiving and the way the design team is carrying it out. This ignoring of its own advice casts doubt on the proposition, presented in the FOE, that future design of the (now conceptual) projects will actually meet the Secretary of the Interior's Standards. See Item II above. For that reason, the Programmatic Agreement which results from the current 106 process must outline requirements for proceeding with design which includes the same degree of consultation as the previous 106 process has provided hitherto, with perhaps improved comprehension and greater responsiveness.

Page 33 of the FOE: The tennis court, resource No. 96, is a contributor to the NHLD. The tennis court should be retained. The tennis court could be retained if the museum were moved elsewhere.

Page 94 of the FOE: The adverse effect which will result from the demolition/moving of No. 96 and 97 is another loss to the NHLD that could be avoided, and should be.

Buildings 40 and 41 should be retained and used to help with interpretation of El Presidio, some of which they may conceal. Their loss would be an adverse effect to the NHLD, and in particular, to the interpretation of World War II.

Page 96 of the FOE: The two small garage structures, Buildings 113 and 118 are slated to be demolished. The effect of their loss exceeds the benefit gained by their removal. Reconfiguring the parking to permit them to be used as garages would allow them to remain as contributing resources while providing places for cars. These buildings should be retained.

The undertaking also removes Building 386, which qualifies as a contributor to the draft 2008 NHLD update. The removal of this building for parking is also unnecessary and easily can be and should be avoided by the same strategy. This building should be retained because its loss would be an adverse effect to the building, the Main Parade, and the NHLD.

It is not appropriate to say only that a “building” will be affected by being demolished. The demolition of an historic building is *adversely affecting the NHLD as well*. Since there is only one NHLD, any adverse effect on any historic contributor cannot avoid being an adverse effect to the Presidio NHLD as a whole. To say otherwise is confusing, incorrect, and minimizes the gravity of each loss of integrity. The only place in the document that has clearly made the connection between loss of integrity and the adverse effect to NHLD is in the sentence that ends at the top of page 78 of the FOE: “It would also result in a direct adverse effect to the NHLD...”

IV Use of a Transportation FOE Format Rather than a Land Management FOE Format

The finding of effects document is not written using a “land management” approach. As land managers, the Presidio Trust should complete the process in ways that better reflect a land management perspective. Instead, the FOE generally evaluates only two conditions of effect: either no effect or an adverse effect. This un-shaded analysis is a type that is commonly used for transportation projects such as highways (like Doyle Drive) and it is an inappropriate format for the Presidio. A land management approach is finer grained, and was the format used in the earlier FOE. Ideally the FOE would look for four gradations of effect:

- No historic properties found
- No effect to historic Properties
- No adverse effect
- Adverse Effect

V Use of Unfounded Speculation

To state (in the absence of evidence) that a project will have no effect because it may in the future meet the Secretary of the Interior’s Standards (the Standards), as the FOE repeatedly asserts, is unwarranted. The writers of the FOE cannot guarantee that the Standards will be used properly in the future. There is no proof that it will be so, especially based on the evidence of how the Standards have been used to date. The latest redesign shows little or none of the understanding or respect for the Standards that that is appropriate in the treatment of an NHLD, and no amount of comment seems to have improved matters. Therefore, the FOE should refrain from speculating that there will be no effect from something which has not yet been designed.

VI Specify Which of the Seven Aspects of Integrity of the NHLD are Effected

The FOE should discuss every contributing feature and how the seven aspects of integrity¹ of the resource would be affected or adversely affected by the individual projects in the undertaking. This may seem a daunting prospect, but the 213 report takes this approach quite successfully. The resulting analysis will be helpful to the identification of strategies for avoidance, minimization, or mitigation. The complexity of the undertaking, rather than the complexity of the NHPA process, is what is making this review seem complicated. The FOE should not be so simplified and condensed that it makes these subsequent tasks harder or the outcome less accurate.

¹ The seven aspects of integrity are Location, Design, Setting, Materials, Workmanship, Feeling and Association. These are the characteristics which allow the historic property to convey its significance.

VII Level of Detail Presented for Preferred Alternative

The information provided in the MPU is now equally vague for all projects, making the “undertaking” less clear, but making it easier to evaluate concepts for the proposed projects. Only a block site plan (a rough massing diagram) has been provided in the review documents for each of the projects. This is despite the statement on page 60 (paragraph 3.2.1) that “some [projects] have more fully developed programs, massing studies and architectural details.”

This level of detail makes it impossible to identify adverse effects to the integrity of the resource that are attributable to the design, materials, and workmanship of the proposed new construction.

However, based only on the location, mass and volume of the proposed new construction, it is possible to see that the hotel, museum and theater construction will each contribute to a finding of adverse effect on the Main Post, and on the NHLD. This is because the sizes of projects are relatively unchanged from what it was last year at this time. This makes the proportional area increase in the Main Post the same as it.

A year ago the museum floor plan was 100,000 sq. ft. It still is 100,000 sq. ft. A year ago, the “Lodge” was said to be 80,000 sq. ft. Between February and June of 2008 the Lodge description grew to 95,000 sq. ft. It is now down to 85,000 sq. ft. (if it includes the restaurant it manages which is now in a separate building).

Stripped of detail, and with only block diagrams and roof heights, and a written description (page 134 of the SDSEIS), one cannot avoid the conclusion that the projects as conceived cannot meet the Secretary of the Interior’s Standards no matter how they are designed, and will cause a serious loss of integrity to the NHLD for which no mitigation is possible. This is because:

1. Some major uses are both inappropriate to the significance of the NHLD and are proposed almost entirely in new construction. The Standards recommend: “A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.”
2. The locations of the hotel and art museum are inappropriate being too central to the important open spaces. The Standards recommend: “placing a new addition on a non-character defining elevation...”
3. The scale and mass of the new construction is too extreme, overwhelming the adjoining historic resources. The Standards recommend: “limiting the size and scale in relation ship to the historic {resource}...”
4. The museum footprint, including courtyards, exceeds the footprint of the previous design. The sod roofs and sunken courts are inappropriate new elements, completely foreign to the military architectural vocabulary of the Presidio, which will alter the integrity of the location, setting, feeling and association. Restricting the excavations to 20 feet will not protect the archaeological resources, some of which lie at 18 ft. bgs.
5. The losses of contributing structures to demolition are too great, and could easily be avoided.
6. The adverse effects on the spatial organization, cluster arrangement, circulation, topography, vegetation, views and vistas, and archaeology are all too great.

7. The accumulation of lost integrity from these projects, with the cumulative effect of previous projects, could result in the delisting of the NHLD.

For these reasons, the proposals are flawed. The outcome of this 106 process will necessarily be inconclusive. Assuming an undertaking which meets Standard #1 can be identified and adopted, a programmatic agreement, will have to detail a process for consulting parties to participate in the working out of the design and its integrity assessment going forward.

VIII Graphics Describing the Undertaking

Some corrections should be made to some of the graphics used in the FOE, some of which are the same as some in the SDSEIS.

1. The Existing building use map (page 13) should show the tennis courts as recreational (purple) rather than as “Vacant/Underutilized.”
2. Figure E (page 16) does not show any buildings being demolished. Proposed demolitions are all shown using the line type and shading which is defined in the key as “Partially Rehabilitated.”
3. Figure I (page 25) shows F-20 stopping at the North edge of the existing bowling center parking lot. According to the borings on Figure J, page 27, there were borings done throughout the parking lot, and some as far as the south side of Moraga Street which contained artifacts. The boundaries of F-20 should be expanded to include all the borings.
4. Figure K (page 28), graphs of borings, should include a rough outline to show the proposed location of the basement and foundation for the museum and its courtyards. Locations of the existing buildings are not as useful.
5. Photos provided of buildings 42, 99 and 130 (pages 490, 44 and 45) show one façade, and do not show the side to which additions will be made.
6. The wire diagrams W1 through W7 (pages 71 to 76) are useful for demonstrating that the proposed addition of building mass is inappropriate. However, these diagrams need to be refined. Interpreting them is difficult without dimensions, such as the datum from roof heights are measured. Including a site section with dimensions would be helpful in understanding the effects. It would also help if the volume enclosed were shown as a solid rather than a transparent form. Specifically:
 - a. The Wire diagram W5 fails to convey the shape of the theater addition. It doesn't show the stepped western wall, and the angle of the west wall appears to be at the wrong angle.
 - b. The diagram of the Museum (W6) should include the deep overhangs which are discussed but not shown. Not showing the overhangs distorts the effect of the form in the landscape. It only demonstrates that the mass is too great in that location.
 - c. Wire diagrams should be provided for all for building including 130 or building 49.

IX Alternative “Strategies for Conforming to the Secretary of the Interior’s Standards”

The section of the MPU called “Strategies for Conforming to the secretary of the Interior’s Standards is apparently an update of what was called “Design Guidelines” in earlier drafts of the Main Post Update. However, the title is misleading. **As in earlier drafts of the guidelines, these strategies if followed would result in the loss of integrity of the resources they modify, as has been borne out by the 213 Report.** Each “strategy” has inherent conflicts with the Standards

which we will outline below. Some of the changes in approach that we suggest might be considered as avoidance, minimization strategies. In some cases, it is difficult to see how any mitigation for the proposed uses would be possible.

Heritage Center and Archaeology Lab: The archaeology lab addition is minimal and unobjectionable. However, all the uses shown in building 50 appear to be similar to what it now houses, and some of it appears to be part of the archaeology portion; i.e. the present gift shop which is now described as “Archaeology Education.” The implementation plan does not explain the intended interpretation of El Presidio (exterior). Nevertheless, it is hard to see how the archaeology of F-1 can both be protected and interpreted. The strategies listed would help, but there is no guarantee they will be followed. The functions of Lobby and Exhibition are the same as these spaces are currently being used. The “special Events” area may be the area intended for the Heritage center, and perhaps some of the upper floors, although they are referred to as “second-floor public assembly spaces” with no assigned content. Suggestion: Remove the Heritage Center element from the MPU until the design and concept for it is fleshed out enough to be better described.

The Lodge: Despite words to the contrary, it appears that more than half of the new construction proposed will encounter the archaeological area F-9. Such a large foot print is not in keeping with the Standards. Any new construction should be confined to the area occupied by Building 34, and the dimensions kept in line with those of buildings 86 and 87. The best avoidance strategy would be to reuse historic buildings, in addition to Pershing Hall, for lodging. In particular, the large 1940’s building, No. 37, might be considered, along with some of the Montgomery Street Barracks. The experience of staying in an historic building would be vastly more appropriate in an NHLD, and would set the proposed lodging apart from its Fisherman’s Wharf competitors. This would also result in fewer findings of adverse effect to the NHLD.

The Art Museum: By limiting the height to 45 feet above the intersection of Moraga and Montgomery, the building will be at elevation +152 rather than at elevation +123 as suggested by the section provided at the public meeting on May 20, 2009. Because the use is inappropriate to the NHLD, the location is one that should not be built upon, and the size is out of scale with the district, the construction of any museum in a new building should be avoided.

The Theater: The proposed addition to Building 99, the Theater, is still too large. New additions to historic structures should be both smaller and lower than the buildings to which they are attached. The “strategy” plan shows a footprint which is even larger than that proposed. Such a volume would not meet the Secretary of the Interior’s Standards. The argument that this addition is not in an important view shed fails to recognize the importance of the views from Infantry Terrace, and from the West entry to the Main Post.

The Post Chapel: The illustration of what constitutes a strategy for “conforming to the Secretary of the Interior’s Standards shows an addition which actually engulfs the historic structure on two sides, and which will be visible from all sides. It is doubtful that this strategy would fail to have an adverse effect if followed.

X Excessive Mass of New Construction Proposed

Buildings of the scale of the proposed Fisher Museum and Hotel (at 100,000 and 85,000 sq. ft. respectively) are too great for the historic context in which they are proposed. Even broken into chunks, the proposed buildings exceed the 2008 NPS charrette effort's recommendation. This amount of new construction cannot be added in such conspicuous locations in any way that could avoid loss of integrity of the Main Post. If completed, it will cause a major reduction in the Presidio's ability to convey its historic significance. The integrity of this central and oldest area of the Presidio is critical to the appreciation of the National Historic Landmark District as a whole and its significance as a National Park. No redesign can mitigate the near-total transformation of this layered, 240 year old container of history into an art park and hotel. The integrity of the cultural landscape in the Main Post will be almost entirely lost in a modern "restoration" of the Main Parade which is designed as a front yard for the proposed Art Museum. And as long as either of those buildings is being considered by the Trust, the proposal for a multiplex theater nearby is subject to the same defect. As we stated in our last letter:

"With these three buildings alone, you are proposing to add over three football fields of interior space to the South end of the Main Post, in the most important historic area within a National Historic Landmark District, lying within a National Park. No design solution is possible so long as the mass and location of these buildings remains unchanged. The proposed buildings could perhaps be accommodated in other parts of the Presidio, though we reserve comment on even that concept until the time when such a proposal might be made."

The total area of new construction now proposed for the Main Post is greater than the total square footage of the historic buildings already facing the Main Parade. The two major buildings exceed the area of all the historic buildings now on Montgomery Street.

XI Consideration of the Undertaking on the Cultural Landscape

The FOE should incorporate a broader treatment of the effects on the Cultural Landscape of the Presidio. The "Summary Statement of Significance" from the 1993 update uses the term "historic landscape" at least seven times in six pages. In addition, the word "landscapes" is used in the same six pages an additional five times. Notwithstanding this fact, the current finding of effect does not include any analysis of the undertaking's effect on the cultural landscape. The current state of the art for Section 106 compliance customarily includes analysis of the cultural landscape, whether it is specifically listed in an NHLD designation or not. But the designation of the Presidio NHLD (on page 8-3 paragraph 2) clearly states that landscape is a very important component of the resource.

"The Presidio district is like a great landscape palimpsest, characterized by a rich and often dense overlay of resources from individual periods. The prime example of this exists in the area of the Main Parade Ground (No 94) where the concentration of historic, architectural, **landscape**, and archaeological resources represents most of the Post's principal periods of development. The national significance of the Presidio of San Francisco National Historic Landmark district rests on the relative vastness of this **historic landscape** and the breadth and diversity of contributing resources within it, which still attest to the prime military function of the reservation's exceptionally long and prominent history."

The Summary Statement of Significance lists as contributing resources numerous landscape features, one of which is a “site” and some of which are called “structure” or “object” and which include flag poles, batteries, tanks, transformer vaults and a few salient objects, one of which is the Main Parade.

The Cultural Landscape Assessment for the Main Post (2002) is a good analysis, and clarifies the layers of history. It constitutes a good beginning, but it includes only a broad planning analysis, and does not meet the detailed requirements for a Cultural Landscape Report. To our knowledge, the Presidio Trust has so far failed to inventory and prepare a suitable report on the Cultural Landscape of the Main Post and have it certified by the NPS. The FOE cannot be considered complete without a Cultural Landscape Inventory, that catalogs and rates contributing landscape features. Without such an inventory it is also impossible to prepare a meaningful finding of effects. There is no benchmark against which to evaluate the effect on the integrity of the cultural landscape in the undertaking. By omitting this document, the Presidio Trust is risking if not ensuring that important features will be “transformed” in ways which will further degrade the integrity of the NHLD.

But even without a completed set of approved Cultural Landscape documents, The FOE must evaluate the property from a Cultural Landscape perspective. While it has been claimed that cultural landscapes were not discussed as significant in the 1993 NHLD Update, it does clearly state under the heading "Additional Landscape Features" in the 1993 Update on page 7-16:

"The Presidio National Historic Landmark update has made an initial effort to identify and explain contributing landscape features, in addition to buildings and archeological features that exist within the Landmark. However, the complexity of landscape alterations resulting from both designed and unconscious manipulations during at least eight definable historic periods has left a historic palimpsest that will require extensive research to sort out, evaluate, and manage...Many contributing features of the landscape have not been located, as yet; this is especially true for elements of the infrastructure for sanitation, water, utility, or other functional systems. These elements are considered to be significant to the overall history and fabric of the historic district if they fall within the period of significance, but were beyond the scope of this update to study in detail."

Preparation of the CLR and CLI should not be considered mitigation since they are required under the regulations. They should be provided before the 106 process is completed and incorporated into the analysis of the FOE.

XII Increased Adverse Effects on Archaeology

By pushing 20 percent of the proposed new construction underground, and by adding subterranean courtyards that are roughly equal in area to the proposed gallery footprint, the Presidio Trust is guaranteeing that the existing archaeology (F20 and part of F1) contributing to the NHLD will be encountered and destroyed by the museum excavation. Even the few borings done to date have disclosed historic period artifacts in the footprint of the museum galleries and its courtyards. Thus, the adverse effect of the undertaking on archaeology is seen to be worse than it appeared to be before. No borings were taken in the footprint of the service portion of the museum that is south of Moraga, so it is impossible to estimate its effect on the archaeology in that area.

As of 1999, the technique of “monitoring and recovery” is no longer considered mitigation under the Standards for Archaeology. Therefore, based on the additional boring information and the larger footprint below grade, the adverse effect of the preferred alternative on archaeology is seen to be much greater than that of the previous design. Once again, the only strategy which can protect the resources on this site is avoidance.

Alas, it is always the case that in order to interpret archaeology, it is necessary to do some damage. Damage to the archaeology of F1 will result from the plans to interpret El Presidio. The working out of details for this must do its best to minimize such damage. More about this program needs to be included in the documents.

XIII The Subject of the Finding of Effect

There is only one NHLD designation and that is for the Presidio as a whole. The Main Post cannot be evaluated under NHPA as if it was a separate NHLD, nor can effects on historic resources not be effects on the NHLD. The FOE often states that there is an adverse effect, or that it is an adverse effect to a single contributing Element, but seldom that there is an effect to the District as a whole. The Presidio NHLD is the only entity that could possibly be adversely affected, and so it must be affected, by any adverse effect to a contributing Element. The FOE should say so.

A spread sheet comparing the determinations of the FOE from last year with the FOE from this year reveals a striking similarity in numbers of adverse effects suggesting that the current undertaking is just as destructive to the NHLD as the previous one.² The 213 Report from the Secretary of the Interior confirms this impression. Both fail to deal effectively with the Cultural Landscape.

XIV Effects on All Parades and Discussion of History

The FOE fails to conclude that there is an effect on the Main Parade from the Museum and Lodge. Since the Main Parade is a listed contributing element this is patently wrong. The Main Parade is listed the 1993 NHLD Update as element #94. Effects upon it must be considered in the FOE. Because both structures will be visible from the Old Parade and El Presidio, these two historic open spaces will also be adversely affected. The new construction will, at minimum, have adverse effects on the setting, feeling, and association, as well as on the design of all three of these important open spaces.

Aside from being a contributing element, the Main Parade is also a character-defining feature of the Main Post and the Presidio Historic Property as a whole. If the preferred alternative is accepted in totality as is, the Main Parade will not be recognizable for its history. This is important because the criteria for listing as a National Historic Landmark District emphasize the HISTORY over the architecture. History needs to be discussed more in the FOE and the MPU, which currently deal only with issues of design. That is one reason why continual change and transition of the architecture and built form of the property is not an acceptable reason for adding new layers to the history. These proposed additions are also not NECESSARY to the function or interpretation of the property. Another objection is that completion of the historic plan to fill in the south end of the parade ground would create a false sense of history because the reasons it was not completed

² This spreadsheet is available on request, but not included herein since it is rather large (24” x 30”).

are important to the history of the Presidio. It was never completed for reasons relating to both the Panama Pacific International Exposition and then the onset of World War I.

XV Cumulative Effects

Lastly, continual erosion of portions of the site dating to the period of significance³ is counter to the ideals of appropriate land management for a National Historic Landmark District property and is counter to the ideals of the Secretary's Standards and Federal Preservation Regulations. The preferred alternative will transform the Main Parade into something else that is unrecognizable and unable to convey its significance. When considering cumulative adverse effects on the district, one must remind oneself of all of the changes to the Lucas complex, Doyle Drive, Crissy Field, and now the proposed Main Post undertaking and remember that the square footage of these combined areas makes up about 30% of the district's square footage. Additionally, while the Crissy Field undertaking was determined to have no adverse effect on the district prior to construction, cost became a factor during construction and the entire site was covered in fill. That, to us, should be considered an adverse effect which was never anticipated.

The Main Parade EA must be included in the evaluation of the overall erosion and cumulative effects of the preferred alternative on the Main Post and the NHLD as a whole. Relying on an EA that was approved prior to this preferred alternative, regardless of whether CAMP and hotels were already in the works at the Presidio Trust or not, must be included in the review of effects and reconsidered since construction of the projects in the Main Parade EA have not yet begun.

There is nothing in the final conclusion of the FOE about how the preferred alternative will affect the status of the NHLD; this is an essential point that has been omitted from the conclusion.

XVI Possible Avoidance, Minimization, and Mitigation Strategies

Our suggestions for avoidance, minimization or mitigation would include the following:

1. We suggest that the Presidio Trust eliminate from the undertaking any project which requires new construction within sight of the Main Parade, the Old Parade, or El Presidio.
2. We suggest that the Presidio Trust avoid the demolition or moving of any contributing or potentially contributing buildings or structures.
3. We suggest that the Presidio Trust wait until the Disney Museum opens so that an objective accurate measurement of the traffic volumes which will come from a new museum can be made. The state of the art for traffic prediction seems an unreliable tool, as the Academy of Sciences experience demonstrated, when they found the traffic demonstrated by the new museum to be much worse than predicted.
4. We suggest that the hotel be housed exclusively in historic structures. This will accomplish several goals:
 - a. Avoid the adverse effects on archaeology
 - b. Avoid the adverse effects on the cultural landscape of a massive intrusion into the center of the NHLD.

³ The period of significance is from 1776 through 1945 in the 1993 update, but is expanded to include 1776 through 1994 in the current 85% draft update of 2008.

- c. Achieve one goal of the Presidio Trust's mandate: to reuse historic structures.
5. We suggest that the art museum be relocated out of the Presidio since there is clearly no way to prevent its damage to the aspects of integrity for Location, Setting, Feeling, Association, and Design of the NHLD. We do not believe this use can be mitigated, due to its inability to meet even the first Standard of the SIS. See I above.
6. We suggest that El Presidio interpretation does not require removing Buildings 40 and 41, and that they remain part of the palimpsest of the Main post. If archaeological resources are found beneath them, they could be interpreted by installing glass flooring in critical areas. This would also have the advantage of protecting the archaeological resources.
7. We suggest that a full Cultural Landscape Report and Inventory, approved by the NPS, be undertaken and the resulting analysis be considered in the working out of the designs for the remaining portions of the undertaking.
8. We suggest that the Presidio Trust does not alter or close contributing circulation and streets, as those changes will also result in a finding of adverse effect and loss of integrity of the NHLD.
9. We suggest that the Programmatic Agreement which results from this year-and-a-half process outline an exhaustive consultation process for the design stages of the undertaking which includes all the current consulting and concurring parties.

SUMMARY

In summary, even without a detailed analysis of the effects on the cultural landscape, the combination of the cumulative effects of past, present and foreseeable future undertakings will alter the Setting, Feeling, Association, and Design of the Presidio, as updated in the 1993 NHLD documents, will cause a catastrophic loss of integrity of the whole, potentially resulting in some or all of the Presidio no longer meeting the qualifications for listing in the National Register and the possible loss of the National Historic Landmark District designation. The new construction, the transformed Anza Street, and the altered and designed landscape will become a new layer in the Main Post with its own powerful set of associations, impacts, materials, and design, and with new associations which have no relation to the military significance which the district was designated. The sad irony is that even those changes which are intended to "reveal the history" will actually conceal it behind a veneer of elegant landscape elements and forms which are alien to the historic use as a military base.

Please do not hesitate to call or email us if there are any questions about any of our comments, or to ask us to expand upon them.

Sincerely

Gary Widman
President

Lucia Bogatay
Director

Cc: David Grubb, Chairman of the Board of Trustees, Presidio Trust
Nancy Hellman Bechtle

T. Robert Burke
Nancy Conner
Curtis Feeny
J. Michael Shepherd
William Wilson III
Stephanie Toothman, National Park Service
Elaine Jackson-Retondo, National Park Service PWRO
Anthea Hartig, National Trust for Historic Preservation
Anthony Veerkamp, National Trust for Historic Preservation
Jon Jarvis, National Park Service PWRO
Paul Scolari, Golden Gate National Recreation Area
John Fowler, Advisory Council on Historic Preservation
Katherine Kerr, Advisory Council on Historic Preservation
M. Wayne Donaldson, CA SHPO
M. Bridget Maley, San Francisco Landmarks Preservation Advisory Board
Frank Dean, Golden Gate National Recreation Area
Michela Alioto-Pier, San Francisco Board of Supervisors
Boyd de Larios, Descendents of Anza Portola Expeditions
Jack Gold, San Francisco Architectural Heritage
Amy Meyer, People for a Golden Gate National Recreation Area
Becky Evans, Sierra Club
Neal Desai, National Parks Conservation Association
David P. Bancroft, Save the Presidio
Mark Nagel, Cow Hollow Association
Lori Brooke, Cow Hollow Association