

Amy Meyer

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COMMENTS RE: 1/26/10 SECTION

106 PA CONSULTATION

Several concerns have been repeatedly expressed by many participants throughout this consultation process and some were alluded to or reiterated on 1/26/10 which are of greatest concern to me. To expand upon these concerns:

* The Main Post Update and new Programmatic Agreement need a written avowal by the Presidio Trust that its jurisdiction is over lands within a national park, one of the most important historic sites in the United States, the most important historic site on the West Coast, and a National Historic Landmark District. Of course the Trust has major financial responsibilities for the Presidio, but the Trust's needs to state that it recognizes and gives primacy to the extraordinary significance of this remarkable place. The Trust should state it will care for the landscape and undertake rehabilitation of buildings and new construction with this overview, and that it will use the Secretary of the Interior's Standards for Rehabilitation and other pertinent standards and regulations as its guide. This avowal would be most logically be displayed at the very beginning of the MPU and new PA.

* After affirming its understanding of the important site placed in its care, the Trust needs to describe in the MPU what it perceives as the most important characteristics of the Main Post. These will become criteria for understanding the various projects to be undertaken, and measuring their effect separately and cumulatively on the integrity of the Presidio NHLD in general and the Main Post in particular. (For example, had such a set of criteria been in place for the Main Post and the Presidio as a whole at the time of the CAMP proposal, it would have been possible to state in a timely way that from these criteria for integrity the requirements for CAMP were such that it could have been placed on the Sports Basement site but not the Main Post.)

* The MPU needs to affirm and the PA to concur that the Presidio, especially the Main Post, is a palimpsest. While Army buildings were not always aligned the way a planner, architect or landscape architect would do it today, in an NHLD rehabilitation and construction are not intended to improve appearances but to make evident the feelings, associations, etc. of the Army, including the layers of history, as per the Secretary's Standards.

* Parties to the consultation made many statements about the illogical process of developing this PA. It is unusual, to say the least, that after more than two years everyone had to tell the Trust on 1/26/10 that they would not sign the PA until the MPU was finished because the more technical document depends on the broader one. These

documents need an open, clear statement of the process to be followed for future undertakings under the MPU and for implementation under the PA. In particular, the intersection between NEPA and the NHPA has not been clear because repeatedly the Section 106 consultants have had to remind the Trust that alternatives to a proposed action have not been considered or have been shortchanged in the scoping process. Since the CAMP proposal became public in August 2007, there has been entirely too much of trying to get the public and its opinions out of the way. I sense that the Trust in recent months has been actively trying to change that perception. However, the defects in this Section 106 process— such as the need for the ACHP, the SHPO, and the NPS to insist that Buildings 40 and 41 not be shown as "when" they will be torn down but that there will be further consideration of "whether"— demonstrate that the Trust is still trying to manage public opinion rather than understanding the public concerns. The Trust should want to enlist people to work in support of the Presidio Trust on behalf of the Presidio.

* There need to be established review times for Trust documents that take into account the needs of organization representatives who must consult with their boards. As a general practice, a review time for anything like this 1/26/10 transcript should be no less than 30 days.

* In general, as cited for the enlargement of the chapel, the need for new construction should spring from the programmatic needs of the project proponent. These needs should be made explicit before any construction is planned so that if the need cannot fit the space available alternative ways of meeting those needs can be explored.

* The archaeology lab project which has been pushing this process should be expedited and separated from this new PA.

* HSRs and similar documents should be prepared early enough with any projects so as to inform their review.

* At all meetings I attended the schematic diagrams for the proposed lodge were incomplete and inadequate. I could not stay into the afternoon meeting on 1/26 but the transcript shows that there is considerable concern about the perceived size of what is proposed because of joining of the buildings and/or their alignment, so that the effect would be of one massive building. That is entirely unacceptable.

* The Anza Esplanade has been changed a great deal since its approval. We need to know what its programmatic content is now and how it is expected to look so we can evaluate the integration of its design with the rest of the Main Post Update.