

Y:CP

February 16, 2010

Mr. Craig Middleton  
Executive Director  
Presidio Trust  
34 Graham Street  
San Francisco, CA 94129

Dear Craig:

On behalf of the Marina Community Association (“MCA”), I am sending you our comments on the Programmatic Agreement for the Main Post Update (“PA-MPU”). The Main Post projects have undergone substantial revisions since the Main Post Update was released in June 2008. I want to recognize the Presidio Trust (“Trust”) for including so many of the fundamental suggestions that the signatory and consulting parties have submitted during this planning process.

We focus our comments on specific projects and procedural provisions of the PA-MPU.

**A. PROPOSED PROJECTS**

*1. El Presidio*

The PA-MPU proposes to remove buildings 40 and 41 in order to facilitate the interpretation of the El Presidio site.<sup>1</sup> According to the Trust, “[r]emoval of the buildings, while an adverse effect, would help to highlight one of the NHL’s most significant – and difficult to interpret – historic resources.”<sup>2</sup>

The Trust’s justification for demolishing or removing these historic structures is not persuasive. These U.S. Army barracks from World War II, standing in the middle of the El Presidio site, vividly demonstrate the Presidio’s layered history. The Trust has not explained why the El Presidio site, without the barracks, is more historically valuable than the site with the barracks. Without this analysis, the Trust should not demolish buildings 40 and 41.

In their written comments on the Technical Draft of the Programmatic Agreement, both the National Park Service (“NPS”) and the State Historic Preservation Officer (“SHPO”) objected to the proposed demolition or removal of these buildings.

Retaining buildings 40 and 41 would enhance the interpretation of the El Presidio site. For example, the Trust could restore part of one of the buildings to its historic appearance, which would enhance visitors’ appreciation of the U.S. military experience at the Presidio.

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<sup>1</sup> See PROGRAMMATIC AGREEMENT AMONG THE PRESIDIO TRUST, THE CALIFORNIA STATE HISTORIC PRESERVATION OFFICER, THE NATIONAL PARK SERVICE, AND THE ADVISORY COUNCIL ON HISTORIC PRESERVATION, FOR THE MAIN POST UPDATE TO THE PRESIDIO TRUST MANAGEMENT PLAN § II(A)(1)(b) (Draft, Nov. 16, 2009) [hereinafter PA-MPU].

<sup>2</sup> Presidio Trust, Responses to Comments Received on the Preliminary Document for Resolving the Section 106 Consultation on the Main Post Update 9 (Jan. 2010) [hereinafter Responses to Comments].

Furthermore, using the barracks for lodging would similarly offer visitors a unique perspective on military life at the Presidio.

The draft PA-MPU would permit seventy-five parking spaces to continue in use on the El Presidio site.<sup>3</sup> The Technical Draft stated that the Trust would eventually remove these seventy-five spaces, but this language is not present in the latest draft of the PA-MPU. To enhance visitors' appreciation of El Presidio, the PA-MPU should specify a timeline for the removal of all automobile parking from El Presidio.

## *2. Site at the Head of the Main Parade*

The PA-MPU states that “building 93 may be reconfigured and reused.”<sup>4</sup> Without more detail, it is our understanding that the reconfiguration of the building will be internal. If the ultimate project involves external modifications to the building, the project should be subject to a full review, including an assessment of adverse effects.

The PA-MPU proposes to demolish structure 96, the tennis court.<sup>5</sup> The Presidio's tennis courts are important recreational assets to the general public. As part of the PA-MPU, the Trust should commit to mitigate the demolition of structure 96 by building a replacement tennis court on an appropriate site elsewhere in the Presidio.

## *3. Main Parade Ground*

The signatory and concurring parties have requested that the Trust include the Main Parade Ground in the PA-MPU. The Trust has rejected this request, explaining that it has already completed the NHPA and NEPA processes for the Main Parade.<sup>6</sup> The Trust held a public meeting on the Main Parade in December, and the Trust stated that it would continue to “inform” the public about the project as it proceeds.<sup>7</sup> We request that the Trust continue to hold public meetings on the Main Parade, not only to inform the public, but also to receive the public's suggestions and feedback.

# **B. PROCESS**

## *1. Project Design Reviews*

The draft PA-MPU states that the signatory and concurring parties will have project design reviews for the Presidio Chapel, the Presidio Theatre, and the Presidio Lodge.<sup>8</sup> Projects at two other prominent sites – El Presidio and the site at the head of the Main Parade – should also be subject to project design reviews. The PA-MPU should be amended to include project design reviews for these other sites, as well.

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<sup>3</sup> See PA-MPU, *supra* note 1, § II(A)(1)(b)(iii).

<sup>4</sup> *Id.* § II(A)(1)(f).

<sup>5</sup> *See id.*

<sup>6</sup> See Responses to Comments, *supra* note 2, at 2.

<sup>7</sup> *See id.*

<sup>8</sup> See PA-MPU, *supra* note 1, § II(C)(1)-(2).

## 2. Archaeology Process and Program for the Main Post Update

The PA-MPU states that the Trust will develop both an archaeology process and program for the Main Post.<sup>9</sup> The Trust's archaeological activities will play a central role in identifying and preserving the Presidio's valuable historical resources. It is curious that the PA-MPU does not include the signatory and concurring parties in the archaeology process and program. It may be helpful for the Trust to consider meaningful opportunities for such participation. For example, the Trust may benefit from submitting materials to the signatory and concurring parties for review.

## 3. Termination

The draft PA-MPU states that the Trust, the SHPO, or the Advisory Council on Historic Preservation ("ACHP") may terminate the agreement, but the NPS may terminate only their participation in the agreement.<sup>10</sup>

The NPS should have the same rights in the PA-MPU as the other signatory parties – including the right to terminate – because of the substantial interest of the NPS in the management of the Presidio. The Presidio is part of the Golden Gate National Recreation Area, and the NPS administers Area A of the Presidio. The NPS and the Trust have also announced plans to work together on a new visitor center.

In comments on the Technical Draft of the PA-MPU, the ACHP suggested detailed language on termination that permitted any signatory party to terminate the agreement. Providing the NPS with less influence over the operation of the PA-MPU is unwarranted, and the NPS should have the same right to termination as the other signatory parties.

## 4. Revised Project Documents

The Trust has committed to updating the Main Post Update and key sections of the Final Finding of Effect.<sup>11</sup> We believe that it is essential to have these updated documents, along with the final draft of the PA-MPU, prior to signing the PA-MPU.

Thank you very much for considering our comments.

Sincerely,



Mark S. Nagel  
Marina Community Association

cc: Frank Dean, Craig Kenkel, Wayne Donaldson, Steve Mikesell, Katharine Kerr, Rob Thomson, Anthea Hartig, Anthony Veerkamp, Brian Turner, Neil Desai

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<sup>9</sup> See *id.* §§ II(G)-(H).

<sup>10</sup> See *id.* § V(B).

<sup>11</sup> See Responses to Comments, *supra* note 2, at 3.