

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

P.O. BOX 942896
SACRAMENTO, CA 94296-0001
(916) 653-6624 Fax: (916) 653-9824
calshpo@ohp.parks.ca.gov
www.ohp.parks.ca.gov



May 27, 2009

Mr. Craig Middleton, Executive Director
Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

RE: Comments on Revised Draft Main Post Update (including 3/4/09 Plan to Complete Section 106) & Draft Finding of Effect Main Post, Presidio of San Francisco

Dear Mr. Middleton:

On March 9, 2009, we received copies of various documents pertaining to the Main Post at the Presidio of San Francisco. These included:

- Revised Draft Main Post Update;
- Draft Supplement to the SEIS;
- Draft Finding of Effect (FOE).

Also attached to your letter was a March 4, 2009 "Plan to Complete Section 106 ..." for the Main Post Update.

This letter constitutes my response to each of these draft documents, except for the SEIS, which is a NEPA, not a Section 106, document. I will not comment on the SEIS, although I did read it as additional information for appreciating changes to the FOE and Main Post Update. This letter is lengthy; these are important compliance actions for an important undertaking.

Overall Comment on Status of Section 106 Consultation

Let me say at the outset that I concur in your finding of adverse effect, as summarized in Draft Finding of Effect. If other signatory parties agree, it is an appropriate time for this consultation to move forward to the resolution of that adverse effect. The comments below include some suggestions for improving the Finding of Effect as well as the Main Post Update upon which the FOE is based. A final FOE, taking into account my comments and those of the other signatory parties, will serve as the basis for discussions on how to resolve adverse effects through avoidance (the preferred option), minimization, or mitigation.

General Comments on All Documents

Across the board, these documents substantially improve upon the equivalent documents, as released in the summer of 2008. In part, this improvement may be attributed to a better understanding of the specifics of the components of the Main Post Update and the impacts of those components on the Main Post and the NHL generally. It is also true that their impacts are less pronounced this time around, allowing the Presidio and its consultants to focus on measurable impacts to individual buildings and sites, rather than the kind of global impacts that were assessed in the earlier iteration of the Main Post Update.

Comments on Revised Main Post Update

General Comments on the Document

Far more than the earlier version, this Update reads as an integrated plan for the Main Post. The sometimes testy debate about the Update last summer focused chiefly on the individual components of the Plan, leaving consulting parties to ponder the cumulative impact of the many components together. This version of the Update reverses this discussion, providing an overall vision for the Main Post, then discussing the manner in which the various parts fit into that vision. In short, this update is a plan, not a series of projects.

The effectiveness of this document in presenting a comprehensible vision for the Main Post helps point the way to conclusion of Section 106 compliance for the Main Post Update. It was always known that the many components – the theater, the lodge, the museum, the El Presidio work, the greening of the parade ground and others – would be planned and completed at different times. It was known that it was infeasible to accomplish final review for all the components at the same time.

The practical solution will be for the consulting parties to review the Main Post Update as a long-range plan for this part of the Presidio and then to agree on a framework for detailed review of each component as plans are developed. This secondary review will occur at different times for different components, as plans are completed to a degree that will facilitate meaningful review and discussion of measures that will avoid, minimize, or mitigate harm. The success of this version of the Main Post Update as a long-range plan goes far in assuring the consulting parties that the overall direction for the Main Post is known, and in providing some assurance that the impacts of individual component undertakings can be understood within the larger context of the Main Post.

Comments on Specific Parts of the Main Post Update

Pages 22-26, “Principles.” The earlier draft proposed a different set of principles, although the old “Revitalize Historic Open Spaces” is roughly equivalent to the new

“Reveal the Presidio’s History,” and the old “Create a Welcoming Pedestrian District” is similar to the new “Create a Welcoming Place.” The third principle of the revised document, “Employ 21st Century Green Practices,” is entirely new. The sustainability goal is meritorious and reflects a long tradition of environmental concern at the Presidio. It is not clear in this document, however, how this principle will guide the design of the major project components discussed in the document. Can we presume the effects of green design will emerge as plans advance?

Pages 28-29, “El Presidio,” and pages 30-31. “Heritage Center at El Presidio.” This work is described more systematically than in the earlier draft. This four page presentation, together with graphics, gives a much better sense of the use of this whole corner of the Main Post, focused as it is on the interpretation of the oldest military story at the Presidio. Clearly, the Presidio Trust has made an impressive commitment of resources to this archaeological and interpretive program. When completed, El Presidio will likely be one of the most extensive archaeological interpretation programs in the Park System. The size of that commitment needs to be emphasized because the program, somewhat ironically, is also responsible for several of the most notable adverse effects associated with the Main Post Update, including the demolition of Buildings 40, 41, and 46 and modifications to Buildings 44, 47, 48, and 49.

Pages 34-35, “Presidio Lodge.” The discussion of the Lodge is much more detailed than in the earlier draft, and the size of the buildings has been reduced substantially. In addition, the principles behind the decision to make the façade of the Lodge face Graham, rather than the Main Parade Ground, are more clearly stated. What is entirely new about this plan is the decision to include a restaurant building to the rear of Building 86. Also new is the suggestion that Buildings 86 and 87 may be used for lodging in the future. These new details will be discussed by consulting parties in the future.

Pages 38-39. “Art Museum.” The discussion of the museum is both more detailed and substantially different than in the earlier draft. The obvious differences between the two are the reduced height of the building and its separation into two structures, joined by a tunnel. In addition, Building 97 will be moved a short distance to the east, instead of being demolished, as was proposed in the earlier draft. The museum building entry will be from Arguello and Montgomery, rather than from the Parade Ground, as was earlier proposed.

The verbal description is much clearer now than in 2008 and the “story pole” type diagrams in the Finding of Effect (FOE) are quite useful. The Office of Historic Preservation (OHP) understands the proposal much better than it did last summer.

Page 40. “Presidio Theater.” Again, this discussion, combined with the “story pole” diagrams in the FOE, go far in explaining the impacts of this proposal. Neither the verbal discussion nor the graphics, however, adequately discuss how the interior spaces of the historic theater will be subdivided. It is the understanding of OHP that the

subdivision will be vertical, i.e. one theater stacked on top of the other, a detail that will need to be discussed in the future.

Page 41. "Post Chapel." This description is rather sketchy and there is no "story pole" depiction of this work in the FOE. This work will need to be discussed in greater detail when more specific plans have been prepared; the proposed addition still seems very large in relation to this elegant, small building.

Pages. 42-43, "Main Post Bluff," and pages 44-45, "Parking." The discussion of the bluff is about the same as it was in the earlier draft but the parking discussion offers what appears to be a major addition to the Main Post plan. Specifically, it proposes adding up to 500 parking spaces at the bluff, of which some 300 will be underground. The details are not fleshed out but one presumes that this work will be accomplished in conjunction with tunneling for Doyle Drive, which will be adjacent to the proposed subterranean garage. Further consultation will be needed for this major undertaking but on first observation it appears to offer no adverse impacts not already associated with the Doyle Drive tunnel. The FOE, however, concludes that this project may have an adverse effect on archaeological site F:21, the Quartermaster Complex. The question remains, however, in this document and in the FOE, as to whether the impacts to the archaeological site are above and beyond those associated with the Doyle Drive tunneling work. The document should clarify this point: Does the parking proposal pose adverse effects above and beyond those associated with Doyle Drive?

Pages 48-55. "Strategies for Conforming to the Secretary of the Interior's Standards."

This section, which is entirely new, is both helpful and potentially misleading to some readers. The "strategies" help to explain the process through which the character-defining features will be acknowledged and protected in detailed planning for the important components discussed here – the Heritage Center and Archaeological Lab, the Lodge, the Art Museum, the Theatre, and the Chapel. The discussion may mislead, however, if the reader concludes that a project plan that complies with the strategy will also conform to the Secretary of the Interior's Standards. It is likely these strategies will work to guide the planning to a design that is more nearly consistent with those Standards. It is far too early, however, to conclude that any or all of these Main Post plans meet the Secretary of the Interior's Standards. That determination will be made much later, through the Section 106 process.

Comments on Revised Finding of Effect (FOE)

General Comments.

This document is a great improvement over the previous version, in nearly every respect. The improvement may be attributed in part to the fact that the undertaking is

better understood than it was in the summer of 2008, and also to the fact that the impacts of the undertaking are generally less pronounced than they were in the earlier draft.

Specific Comments

Pages 1-8. Introduction, Section 1.1. This is a much better organized overview, stating very clearly the relationship between the *Main Post Update* and the Undertaking to which the FOE is addressed. In the earlier draft, there was legitimate confusion among the consulting parties as to whether the Update was the undertaking. This introduction erases any ambiguity about that: the Update is the undertaking and the FOE concerns any and all plans discussed in the Update. It also makes clear that the Update is also the Preferred Alternative under the NEPA analysis.

Pages 15-20. Section 2.2 The Main Post. This is an excellent discussion of how the landscape of the Presidio has evolved over time. Although it is lengthy, this entire "identification of resources" is very informative and insightful.

Pages 22-30, Discussion of archaeological properties. The discussion confirms earlier conclusions about the location of known archaeological resources within the area of the lodge, museum, and theater, particularly sites F:1 (the Spanish Presidio) and F:9 (the west side of the old parade ground).

The discussion is well-informed, however, by new information gained from coring in the museum site (presumed to be part of F:1), and trenching at the lodge site (presumed to be part of F:9). The archaeology at the museum site is inherently more sensitive because of the rarity of Spanish Presidio-related sites, but also difficult to assess because of the substantial amount of cut and fill work at the site in decades past. The trenching at the lodge site confirms the presence of early American materials. The Draft FOE is correct in assuming an adverse effect on both sites, although the extent of that effect is difficult to predict. Archaeological minimization and mitigation will be a subject for parties to discuss during the resolution phase of consultation.

The tables on pages 92 and 95 appear to be inconsistent with the verbal description of impacts. The tables indicate that the Heritage Center, Archaeology Lab, and Presidio Theatre will not have direct impacts to archaeological properties. The text, however, indicates that infrastructure upgrades will have the potential to adversely impact intact archaeological deposits. This apparent contradiction should be explained and corrected.

Section 2.3, "Contributing Resources Potentially Adversely Affected," pages 35-51. The use of photographs in this section is excellent. The text and photographs work together to identify the specific resource (only Presidio Trust staff can keep the many buildings straight without visual reminders) as well as the character-defining features that may be impacted.

Craig Middleton
May 27, 2009

Minor point: This section consistently uses the term "Potentially Adversely Effected" where "Affected" is the proper term.

Pages 61-89, Section 3.3. Effects under the Main Post Update.

This, of course, is a key part of this document as it applies the Criteria of Adverse Effect to the various components of the Main Post Update. In general, Criteria of Adverse Effect appear to have been applied to these components in a professional and defensible manner. The OHP does, however, have two comments that might improve this section of the report.

First, in nearly every case, the document draws a conclusion about the impact to the individual building or structure and then a conclusion about the impact to the district as a whole. For example, on page 83, the report concludes that the addition to the Theatre (Building 99) "would ... [result] in a direct adverse effect on the building." It goes on to say that the construction "would not result in a direct adverse effect on the NHLD as the addition will be located on the side of the theatre facing away from the Main Parade."

The FOE draws similar conclusions about the effects of the Museum and the Heritage Center. In the opinion of OHP, this distinction is unnecessary. There is an adverse effect on the particular building and the component therefore will result in an adverse effect. It is unnecessary and premature to draw conclusions about the effects on the historic district. We do not know enough about the design of the addition to the Theatre, for example, to agree or disagree that it will not adversely affect the overall district. We do know enough, however, to conclude that it will adversely affect the Theatre itself. The same situation holds for the effects of the Museum and Heritage Center. This problem can be resolved easily by removing the section that addresses effects to the larger district.

Our second comment has to do with drawing definitive conclusions about components of the undertaking that are not definitively known. For example, the new restaurant building near Building 86 (part of the Lodge project) is said to result in "no adverse effect to building 86 or the surrounding resources," because it is physically separate. We are concerned that it is premature to draw that conclusion in the absence of more specific design information. A better conclusion is that for the addition to the chapel, where it is argued that the project will not result in an adverse effect **if** it can be made to conform to the Secretary of the Interior's Standards.

Pages 91-97. "Conclusion." The effects matrix is a useful summary and should guide the consideration of this document by this office and the general public.

Comments on the Plan to Complete Section 106 Compliance ... for the Main Post Undertaking.”

The plan accurately reflects work that has been accomplished to date and presents a reasonable schedule for accomplishing remaining tasks. The schedule, we understand, is a work in progress and is subject to change.

Comments on relationship between Draft Finding of Effect and Section 213 Report, prepared by the National Park Service

I would be remiss not to mention and discuss the excellent Section 213 Report on the MUP, prepared by the National Park Service at the request of the Advisory Council. This lengthy report offers a thoughtful analysis of the character-defining features of the Presidio generally, of the Main Post, and of specific resources affected by the MPU. It also offers a series of recommendations which can and should point the way toward minimizing and/or mitigating the adverse effects identified in the Draft Finding of Effect. The 213 Report, in my opinion, will be most useful as we proceed from the analysis of effects to the resolution of adverse effects.

For present purposes, however, it does not seem to me that the 213 report and the Draft FOE are significantly at odds with respect to the immediate need to identify effects for the MPU. Both reports agree that the effects are adverse and they generally agree on the specific aspects of the MPU that cause the adverse effect. This is especially true when considering the individual components of the MPU. The 213 Report and the Draft FOE differ in their treatment of cumulative effects, although both agree that the cumulative effects will be adverse.

To repeat, the 213 Report will prove invaluable as the consulting and signatory parties consult to discover means of minimizing or mitigating adverse effects. At present, however, the report does not cause me to revise my general impressions of the Draft FOE, which were developed before the 213 Report had been released.

Overall comments on how to avoid, minimize, or mitigate adverse effects for the Main Post Update

While it is clear the Presidio Trust and this office are in agreement on the effect determination for this undertaking, this office believes there is still a great deal of room for discussing the ways of avoiding, minimizing, and/or mitigating those adverse effects.

My staff and I are convinced there is still time and the opportunity to reduce the adverse effects for the overall MPU and for each of the component parts. Every aspect of this MPU – El Presidio, the Lodge, the Museum, the Theater, the parking plan – has adverse effects associated with it. We feel strongly that, with a strong commitment to preservation as a first priority, the talented staff at the Presidio and its consultants could

avoid many of these adverse effects. While it is unlikely that all adverse effects can be avoided, even the unavoidable impacts can be minimized or mitigated through careful planning and design. A preservation first commitment should lead to a series of decisions that will minimize the many adverse effects of this undertaking, one impact at a time. We look forward to assisting the Presidio staff in this necessary endeavor.

Again, we appreciate the opportunity to comment on this generation of documents for this important project. We believe a great deal of progress has been made since we last commented on this undertaking and for this we congratulate you and the fine staff at the Presidio Trust.

Sincerely,

Milford Wayne Donaldson, FAIA
State Historic Preservation Officer