

May 16, 2008

Craig Middleton  
Executive Director  
Presidio Trust  
PO Box 29052  
San Francisco, CA 94129-0052

Re: Section 106 Comments on Main Post Undertaking

Dear Mr. Middleton:

On behalf of the National Trust for Historic Preservation (National Trust), thank you for the opportunity to provide comments regarding the National Historic Preservation Act (NHPA) Section 106 assessment of effects for the proposed undertaking at the Main Post of the Presidio of San Francisco.

As a concurring party to the Programmatic Agreement (PA) for the Presidio Trust Implementation Plan, the National Trust is committed to the policy stated therein that:

“The (Presidio) Trust shall manage and preserve the integrity of that portion of the NHLD in Area B through planning, research, and specific undertakings consistent with good historic preservation management and stewardship, the goals of the NHPA and related regulations, standards, and guidelines.”

Our understanding of the proposed undertaking is that it includes demolition of historic and non-historic buildings totaling up to 157,000 square feet, new construction of up to 265,000 square feet, rehabilitation of up to 20 contributing buildings (though it is not clear how many of these are within the Main Post District), creation of new parking for up to 2,100 cars, and modifications to historic circulation patterns. In addition, the undertaking includes the finalization of Main Post design guidelines and an amendment to the Presidio Trust Management Plan (PTMP), the latter necessitated by the fact that much of the proposed development would violate the existing PTMP.

The National Trust takes our responsibilities as a concurring party to the PA very seriously. We are firmly committed to the Presidio Trust Act mandate that the Presidio “be managed in a manner which ... protects the Presidio from development and uses which would destroy the scenic beauty and historic and natural character of the area.” While we support efforts by the Presidio Trust to rehabilitate the Main Post, this support is predicated on the principle that all actions are undertaken in a manner consistent with the *Secretary of the Interior’s Standards for the Treatment of Historic Properties* (*Secretary’s Standards*). Unfortunately, as emphasized by the National Park Service (Letter from Brian O’Neill, NPS (April 4, 2008),) this project would not conform to the *Secretary’s Standards*, and indeed, would be inconsistent with the Presidio Trust’s own planning guidelines and analysis.

As steward of the park's vast array of cultural and natural resources, the Presidio Trust is charged with preserving the character and integrity of the Presidio National Historic Landmark District (NHL District). To this end, the Presidio Trust Management Plan places "the highest priority" on "actions that carry out the preservation, rehabilitation, and use of historic buildings and landscapes" (PTMP, Ch.1, p.5.)

As you are aware, because of the Presidio's NHL designation, Section 110(f) of the NHPA requires that the Presidio Trust "to the maximum extent possible, [to] undertake such planning and actions as may be necessary to minimize harm to such landmark." 16 U.S.C. § 470h-2(f). The Presidio Trust is furthermore required to consider all prudent and feasible alternatives to avoid an adverse effect to the NHL.

The enormous scope of the proposed undertaking and the current lack of clarity regarding the individual actions encompassed therein frustrate any attempt at formal Section 106 comments. We anticipate a far greater level of detail to be revealed in the draft Supplemental Environmental Impact Statement (SEIS) and its analysis of alternatives in June.

Pending release of the draft SEIS, we offer the following comments as an expression of our serious concerns regarding the direction that planning for the Main Post appears to be taking. We hope that our comments and concerns as well as those expressed by the other signatory and concurring parties will lead the Presidio Trust to develop and consider alternatives and modifications to the project that would avoid and minimize adverse effects on the Presidio of San Francisco National Historic Landmark District.

We concur with the Presidio Trust's identification of the entire Presidio of San Francisco National Historic Landmark District as the Area of Potential Effect. Considering effects to the entire NHL District is appropriate given the scale, location, and nature of the proposed undertaking. Unfortunately, we believe the adverse effects of the undertaking to the NHL District to be severe.

The National Park Service has already concluded that "(t)he projects as proposed in the current undertaking are not consistent with the Secretary of the Interior's Standards, nor are they in keeping with the Trust's own planning guidelines and cultural landscape analysis for the Main Post" (Letter from Brian O'Neill, NPS, at p.2 (April 4, 2008).) This letter goes on to state that that the adverse effects of the undertaking would be so severe that the project "could lead to possible de-designation of the NHL" (p 3.)

We are in complete concurrence with the NPS in this assessment. Specifically, we believe that the proposed undertaking would significantly diminish the integrity of the "design", "setting", "feeling", and "association" of the Presidio in general and the Main Post in particular. Following is a brief assessment of adverse effects of the undertaking on those four aspects of integrity.

As previously noted, this analysis is by necessity broad-brushed, as we currently lack sufficient detail concerning the proposed new construction to provide a fine-grained assessment. We have limited our current assessment to the major new construction

included in the undertaking; namely, the proposed hotel, the proposed “CAMP” structure, and the proposed major expansion of the existing theatre (Building 99.) (Unless otherwise noted, these comments are based on the construction of the contemporary art structure on the site of the existing bowling alley.)

**Design:** As *National Register Bulletin 15* states, “design is the combination of elements that create the form, plan, space, structure, and style of a property.” Most cultural landscapes and historic districts can accommodate limited new infill construction and still retain their integrity of design, and the Presidio is no exception. The existing PTMP generously allows for a maximum of 110,000 square feet of new construction at the Main Post. The proposed undertaking, which would *double* that figure, represents a radical departure from the current plan. The enormous scale and inappropriate siting of the proposed new construction is well beyond what the historic Main Post can accommodate without the significant diminishment of its integrity of design.

Regarding the proposed hotel specifically, the National Trust has previously acknowledged “that there are some bona fide planning reasons to consider a limited amount of infill construction along the Anza Esplanade” (letter from Anthony Veerkamp, NTHP, at p 2 (February 7, 2007).) However, the scale of the currently proposed structure is well in excess of what might be appropriate to reinforce the historic separation between the Main Parade and the Old Parade.

The “CAMP” building as proposed for the current site of the bowling alley is grossly inappropriate in location, scale, materials, and design. We have difficulty imagining the Presidio Trust proposing a more inappropriate intervention for the Main Post, or one more contrary to the Presidio Trust’s duty to preserve the character and integrity of the Presidio National Historic Landmark District. In contrast to our preceding comments regarding the possible historic appropriateness of infill along Graham Street, we see no historic preservation rationale for new construction on this site. The construction of the bowling alley by the Army on this site was a regrettable decision, and not one that the Presidio Trust ought to exacerbate.

The *Secretary of the Interior’s Standards for the Treatment of Historic Properties and the Guidelines for the Treatment of Cultural Landscapes* make numerous references to the inappropriateness of recreating designs that were never historically implemented. Restoration Standard 10 states “Designs that were never executed historically will not be constructed.” The guidelines include as a “Not Recommended” treatment “constructing a feature that was part of the original design but that was never executed.” We are absolutely unconvinced that an unimplemented 1907 plan for the Presidio should provide the basis for contemporary infill construction.

**Setting:** Setting is the physical environment of a historic property. *National Register Bulletin 15* states: “setting refers to the *character* of the place in which the property played its historical role. It involves *how*, not just *where*, the property is situated and its relationship to surrounding features and open space.”

We believe that the proposed new construction would visually dominate the Main Post and would drastically alter the Post's character, and thus diminish the integrity of setting of those historic elements of which it is comprised. The "CAMP" facility at the bowling alley site is especially intrusive, as it would be visually dominant from so many perspectives. While no amount of redesign could mitigate the effect of a facility of this size, the preliminary renderings that we have seen depict a building that intentionally calls attention to itself.

Locating "CAMP" to the south of Moraga Street offers the potential of lessening the structure's impact on the Main Post's historic setting and design, though the scale and design would remain problematic issues to be resolved. This site shares many qualities with the bowling alley site, but new construction south of Moraga has the potential to be less visually intrusive on the historic core of the Main Parade. We believe that Building 386 (the library) may be found to be a contributing element to the NHL District, and should be retained.

**Feeling and Association:** These two aspects of integrity are closely related. Feeling refers to a place's expression of the aesthetic or historic sense of its past, while association is the direct link between a property and its history. Though feeling and association are intangible qualities, they both depend upon the presence of physical features that, taken together, convey the property's historic character. Modern intrusions in a cultural landscape or historic district can significantly impair a place's ability to convey that character.

Feeling and association both "depend on individual perceptions" (*NR Bulletin 15*, p. 45.) The subjective nature of these two aspects of integrity makes it difficult to prove or disprove their retention or diminishment. Perhaps for that reason, the National Park Service clearly states that "their retention *alone* is never sufficient to support eligibility of a property for the National Register" (*NR Bulletin 15*, p. 45.) Using the same logic, we would be extremely skeptical of any analysis suggesting that a supposed enhancement of the Main Post's integrity of feeling or association might somehow mitigate or counter the diminishment of the other aspects of integrity.

Despite some modern intrusions (most notably, the significant intrusion of large parking lots) the Main Post currently maintains a significant degree of integrity of feeling. While the Main Post exhibits a complex layering of historical elements, it does not take an enormous leap of imagination to conjure up the Presidio as an active military installation towards the end of its period of significance (as framed by the current NHL nomination.) The views of a visitor standing on the Main Parade today are dominated by historic buildings and design features. These physical elements taken together convey the Presidio's aesthetic and historic sense of its past, allowing the visitor to comprehend a direct link between the physical place and its history.

The Presidio can be said to maintain its integrity of association by the degree to which it is able to convey to a visitor the relationship between the place and the historic events and activities that happened there. Integrity results from the presence of physical features that, taken together, convey the property's historic character.

If the proposed new construction were to proceed, a visitor would find many views dominated by modern intrusions unrelated to the history of the Presidio. The result would be a significant impairment of the visitor's ability to relate her surroundings to the historical events and activities that lend such historical significance to the Presidio. As the NPS has noted, this adverse effect would be amplified if the Main Parade Ground were redeveloped as currently proposed in the Environmental Assessment (EA) and Finding of No Significant Impact (FONSI).

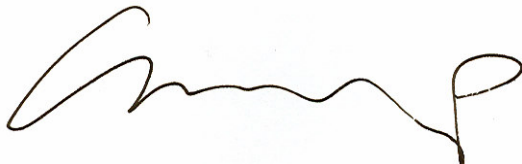
Taken together, the diminishment of the historic integrity of the Main Post that would result from the proposed undertaking is profoundly disturbing. Given the Main Post's role as the historic "heart of the Presidio," the degradation of its historic integrity would be fundamentally contrary to the Presidio Trust's mandate, and must be avoided at all costs.

For any Federal agency to pursue actions that would harm an NHL is regrettable. But the Presidio Trust is not any Federal agency. The Trust is directed by its enabling legislation to protect the National Historic Landmark under its stewardship from development and uses that would destroy its historic character. The Presidio Trust is looked to as an example by other federal agencies, and thus the Trust's approval of a project this damaging would set a national precedent that would have widespread consequences.

As your preservation partner and signatory to the Presidio Trust PA, we look forward to working with you to assure the protection of the Presidio of San Francisco National Historic Landmark District.

Please feel free to contact me or Western Office Director Anthea Hartig at (415) 947-0692 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Anthony Veerkamp', written in a cursive style.

Anthony Veerkamp  
Senior Program Officer

cc:

Michela Alioto-Pier, San Francisco Board of Supervisors  
Ric Borjes, Presidio Trust  
M. Wayne Donaldson, CA Office of Historic Preservation  
Becky Evans, Sierra Club  
Jack Gold, San Francisco Architectural Heritage  
Elaine Jackson-Retondo, National Park Service PWRO  
Katherine Kerr, Advisory Council on Historic Preservation  
Jon Jarvis, National Park Service PWRO

Boyd de Larios, Descendents of Anza Portola Expeditions  
Kryi McClellan, City of San Francisco  
Betsy Merritt, National Trust for Historic Preservation  
Brian O'Neill, Golden Gate National Recreation Area  
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