



December 17, 2007

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

Attention: John Pelka, Compliance Manager

Re: Comments on Scoping for Supplemental Environmental Impact Statement for Main Post District

Sent electronically and via USPS

Dear Mr. Pelka:

On behalf of the National Trust for Historic Preservation (National Trust), thank you for the opportunity to comment on project scoping for a Main Post Supplemental Environmental Impact Statement (SEIS) for the Presidio of San Francisco.

As a concurring party to the Presidio Trust Implementation Plan Programmatic Agreement, the National Trust is 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.” As always, we look forward to working with you to assure that the planning principles laid out in Chapter One of the Presidio Trust Management Plan (PTMP)—“Preserving & Enhancing Park Resources”—are reaffirmed during this planning process.

The National Trust is gratified by the decision to terminate the Environmental Impact Statement (EIS) process for the Presidio Museum and the Environmental Assessment (EA) for the Presidio Lodge, and instead to consider proposed actions affecting the entire Main Post District in one environmental review. As we noted in our previous

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Western Office National Trust for Historic Preservation
(415) 947-0692; Fax (415) 947-0699

<http://www.nationaltrust.org>; E-mail: wro@nthp.org
The Hearst Building, 5 Third Street, Suite 707, San Francisco, CA 94103

oral comments on the scoping for the Presidio Museum on the Main Post, this new approach is essential in order to adequately consider cumulative effects as required by the National Environmental Protection Act. However, we are disappointed by the decision not to include other proposed action affecting the Main Parade, especially the Main Parade Rehabilitation, within the scope of the new SEIS. This narrow scope reduces the ability of the SEIS to consider the full range of impacts and institutes conditions that constrain the development of alternatives that minimize negative impacts to the Main Parade.

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 your preservation partner and signatory to the Presidio Trust PA, we strongly support an SEIS that adequately considers alternatives that would support this priority and minimize new construction in favor of the rehabilitation of historic features.

As you are no doubt aware, the National Trust, along with members of the preservation community and the general public, has long expressed concerns that the historic integrity of the NHL District could be threatened through a combination of loss of historic features and introduction of new construction. These concerns were articulated in comments during environmental review process for the PTMP.

The Final EIR for the PTMP attempted to allay these concerns. It states, for example:

"The Trust has provided clarifications regarding the intended use of new construction in the park in part to allay the fears of commenters that program and museum uses will drive large-scale new construction...The Plan does not propose new construction to provide additional large-scale buildings as venues to host programs, but rather emphasizes rehabilitation and reuse of existing buildings for preferred uses, including program-related uses." (Response to PR-8, p.4-210)

"Lodging will be provided in existing buildings, primarily historic buildings. The only new construction for lodging would consist of additions or annexes

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necessary to enable an existing structure to function as a lodging facility.”
(Response to LO-5, p.4-200)

“...new construction is envisioned as a way to facilitate rehabilitation and reuse by improving the functionality of older buildings and increasing the financial feasibility of reuse.” (Response to NC-4, p.4-166)

...the Trust will make every reasonable effort to adapt historic buildings to new uses and that in cases where new construction is considered, it will primarily be to encourage the reuse of historic buildings.”

We are eager to see these commitments and philosophies reaffirmed through current planning process.

The following are specific comments, issues, and concerns that we urge you to consider in the preparation of the Supplemental Environmental Impact Statement for this project.

Purpose and Need

The purpose and need of the SEIS should be detailed in its discussion of project need and be sufficiently broad to include a reasonable range of alternatives. It appears that the purpose and need for the project is to amend the PTMP to accommodate a 100,000 square foot museum at the Main Parade, which would serve as a catalyst for attracting other compatible uses to the same area.

The Purpose and Need statement should be structured to consider placement of a major cultural institution at the Main Parade ground according to the parameters of the RFP, not a specific submission to the RFP. This will allow for a wide range of alternatives for new construction versus rehabilitation of existing buildings, comparison of types and sizes of cultural facilities and their impacts, and determine what types of facilities would serve as the desired catalysts for compatible development elsewhere around the Main Parade.

The SEIS needs to articulate why proposed lodging and museum facilities should be located in a national park setting versus any other urban setting, and why within the Presidio, the Main Parade is the setting that best promotes the PTMP’s goals of preserving and enhancing park resources. How do these facilities contribute to the park visitor experience and visitor use? How do services and programming relate to and

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integrate into the historic setting? What will the role of the Presidio Trust be to ensure that programming reaches a broad public and continues to enhance visitor understanding of the Presidio? Why are proposals being pursued for a major new museum with no interpretive relationship to the Presidio in advance of specific plans for a facility that interprets the Presidio's rich history and resources?

In the past, the Presidio Trust has justified proposed development by arguing that it would help the Trust meet its mandate of financial self-sufficiency. For example, new construction at Letterman was to generate early and significant revenue to pay for capital improvements and historic building rehabilitation that, in turn, would allow revenue generation at other areas of the Presidio. We are now once more facing major new construction at a level not anticipated in the PTMP. It will be critical for the SEIS to demonstrate the project need for proposed actions at the Main Post, much of which is already rehabilitated and occupied. If the project need is not financial, the rationale for large-scale new construction becomes doubtful.

We are aware that the Presidio Trust received just two responses to the Request for Proposals (RFP) for Cultural Institutions at the Presidio Main Post; the previously announced proposal for a facility to house Doris and Donald Fisher's Contemporary Art collection (since dubbed Contemporary Art Museum of the Presidio, or CAMP) and a History Center at the Main Post proposed by the Presidio Historical Association.

As noted in the August 8, 2007 Notice of Intent for a Public Museum at the Presidio – Main Post, the Trust is required to provide for “reasonable competition” when seeking tenants. Unfortunately, the news conference held at the Presidio (in advance of the issuance of the Request for Proposals for Cultural Institutions at the Presidio Main Post) announcing the Fisher museum proposal, coupled with the public support for the proposal expressed by elected officials and Presidio Trust board members and staff, created a widespread impression that the Fisher proposal was a “done deal.” Certainly, no one was surprised when only one organization rose to the challenge.

Thus, the opportunity to attract proposals which could have been the basis for alternatives for analysis in the SEIS, as contemplated in the August 8, 2007 Notice of Intent, was lost. Nonetheless, the SEIS needs to consider the full range of cultural facilities contemplated by the RFP, rather than focus solely on the two proposals in hand.

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Affected Environment and Area of Potential Effect

We believe that the Affected Environment for NEPA and Area of Potential Effect (APE) under Section 106 of the National Historic Preservation Act should be expanded to include the entire Presidio NHL District, and not be limited to the Main Parade. Given the importance of the Main Parade area in the NHL District, and the potential for actions proposed in the SEIS to create additional changes elsewhere in the NHL District as uses are shifted, an APE encompassing the entirety of the District is appropriate.

The proposed actions would increase the allocated square footage for the Main Post district as compared to PTMP and change land use, changes which are likely to have a domino effect Presidio-wide. In addition, there is the potential that changes being considered in other planning districts effect the Main Parade. For these reasons, the project area for this undertaking should encompass the entire NHL District.

Moreover, the 1993 update to the Presidio National Historic Landmark District (NHL District) is now seriously out of date, and its use as a baseline for the Affected Environment for the SEIS is inadequate. Through the passage of time, additional resources have undoubtedly become contributing features to the NHL District. We understand that an update of the NHL District nomination has been proposed, but we believe that update should be part of the SEIS process in order to ensure that impacts to historic resources are properly evaluated.

Alternatives

A meaningful and complete examination of alternatives is key to a successful SEIS process. Alternatives considered in the SEIS should include variety in type, size, and location for the proposed cultural facility. Furthermore, we strongly encourage the study of a range of alternate sites for both the proposed museum and lodge.

Regarding the proposed public museum specifically, the Presidio Trust consider Crissy Field as the premier location, as recommended in the PTMP. The SEIS should consider alternatives including the reuse of the Commissary, demolition of the Commissary and replacement construction, and the rehabilitation of hangers combined with new construction west of the Commissary site. Many concerns surround the placement of such a large, new building at the top of the Main Parade, the historic heart and soul of the Presidio NHL District. While the development of a facility of this size and scope anywhere in the Presidio will require extensive planning and design oversight, there is little doubt that another location less central to the historic character of the Presidio

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could provide greater design freedom and ultimately a better experience for park visitors and museum goers. Furthermore, by avoiding the historic heart of the Presidio, development at Crissy Field could be afforded greater design latitude. Once Doyle Drive's reconstruction is completed, Crissy Field will be accessible from the Main Post and the transit center.

Another alternative site for the museum that should be considered is the area south of Moraga Street, the current location of buildings 385, 386, and 387. This site has many of the touted benefits of the currently proposed site, but new construction there would seem to be much less visually intrusive on the historic core of the Main Parade.

Impact Topics

Historic Resources

The National Trust continues to be concerned over the amount of new construction proposed for the Main Post. We believe that the cumulative effect of the proposed actions could represent a significant adverse effect on the Main Parade and the National Historic Landmark District as a whole. Section 110 of the National Historic Preservation Act requires the Presidio Trust, to the maximum extent feasible, to minimize harm to the Presidio National Historic Landmark district resulting from its undertakings. The SEIS needs to discuss how the Trust is meeting this obligation, or not, with the proposed action and alternatives.

Numerous actions have been taken and are planned by both the Presidio Trust and the National Park Service. While many of these actions have benefited historic resources and enhanced the NHL district, we have grown concerned that the overall integrity of the NHL is being compromised over time through attrition and new infill construction, a trend that would certainly be exacerbated by proposed actions at the Main Post. The lack of an up-to-date NHL nomination surely hampers this planning effort.

In order to adequately evaluate the impacts on the NHL of alternatives considered in the SEIS, the document needs to include a complete review of all of the demolition and new construction undertaken since the 1993 NHL was completed and the Presidio was designated a National Park, along with a timetable of currently proposed actions affecting historic resources.

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Importantly, 210,000 square feet of new construction have been proposed for the Main Post—100,000 square feet in excess of the cap for the Main Post in the PTMP. The SEIS needs to fully assess the impacts of this increase in square footage at the Main Post not only on the Main Post, but throughout the Presidio NHL District. In addition, the PTMP limits total building square footage in the park to 5.96 million square feet, and commits to a reduction of that square footage to 5.6 million square feet over time.

The SEIS should demonstrate how proposed actions support the PTMP's goals of limiting and reducing total building square footage. If currently proposed new construction proceeds, will there be a commensurate reduction in new construction in other Presidio planning districts? If buildings need to be demolished to offset net increases in square footage at the Main Post, please identify and evaluate their removal on the NHL District.

Sustainability

The Request for Proposals for both the Presidio Lodge and Cultural Institutions each cite a project objective to “incorporate ‘green’ design and sustainable principles and practices that lower energy consumption, conserve natural resources, and reduce pollution.” Alternatives considered in the SEIS should be identified and evaluated based on their adherence to principles of sustainability, taking care to fully account for the environmental benefits resulting from reusing existing structures over new construction. The EIS should document the amount of energy and materials to be expended and/or disposed of for each alternative including quantities of landfill materials generated by each alternative.

Economics

The Presidio Trust Management Plan Final EIS clearly underscores the role of new construction is *support of historic preservation and resource protection*:

“...new construction is envisioned as a way to facilitate rehabilitation and reuse by improving the functionality of older buildings and increasing the financial feasibility of reuse.” (Response to NC-4, p.4-166)

“New construction would be undertaken only where necessary to meet Plan goals, including preservation, protection, and enhancement of natural, cultural, and recreational resources, making the park accessible to a wide cross-section of

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the public, and meeting the financial self-sufficiency requirement.” (NC-1, p. 4-162)

“...new construction offers fewer financial risks that reuse of existing buildings and can provide a reliable revenue stream to help finance historic preservation of adjacent/nearby buildings or activities...New construction can also help to obviate financial risks associated with historic rehabilitation, since a building addition or annex can help provide revenues to support the historic rehabilitation.” (Response to NC-1, p.4-165)

The SEIS should document how any proposed new construction financially support preservation of historic buildings and the Presidio NHL District. The economic analysis should also fully explain the financial structure and implications of any proposed development. A full accounting of public expenditures anticipated in support of the proposed projects should be included (for example, demolition, infrastructure upgrades, utilities relocation, existing tenant relocation/buyout costs, hazardous materials abatement, project management, parking design and construction, etc). This analysis should include but not be limited to:

- the amount of expected annual income from proposed developments;
- whether the new development will cover the full Service District Charge for all of the floor area occupied;
- whether there is a market-based ground rent for proposed development;
- in the case of the CAMP proposal, detail whether the proposed philanthropic donation is an unrestricted gift or an advance or partial payment of ground rent for the development site; and
- detailing of any forgone revenues and opportunity costs, including public and private investment since October 1994, in particular for the repair and rehabilitation of sites and structures considered for demolition.

Conclusion

As we have previously, the National Trust supports in concept both a contemporary art museum and a lodging facility at the Presidio, and we have consistently contended that the need for historic interpretation of this remarkable resource should be prioritized. We are hopeful that both of these new amenities can be developed without adversely affecting the National Historic Landmark. However, we are opposed to the scope and scale of new construction that has been proposed for the Main Post, which we believe

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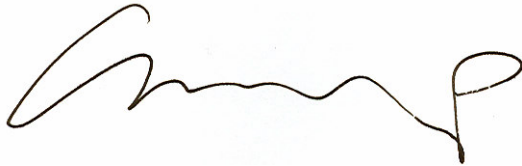
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would harm the historic character and integrity of the Main Most and the Presidio National Historic Landmark district. New construction should always benefit and enable the re-use and recycling of historic and older buildings and enhance the unique historic character of the Presidio. We look forward to reviewing the consideration of creative, meaningful and feasible alternatives in the SEIS that fulfills the vision of the PTMP and all of us in the preservation community who believe in the Presidio's past and future.

The National Trust supports this expanded SEIS because procedurally, it is the right thing to do. However, we worry that a mere five years into the life of the PTMP—a plan that was the result of years of hard work and public involvement—actions are being contemplated at the Main Parade that violate both the spirit and the letter of the existing Presidio Trust Management Plan. We embark on this new planning process with concern for the fate of the Main Parade, but also with trepidation that this signals the potential erosion of the preservation principles of the PTMP through incremental district-by-district amendment.

We remain your committed preservation partner and are grateful for the opportunity to comment on the Main Parade Environmental Assessment. 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

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<http://www.nationaltrust.org>; E-mail: wro@nthp.org
The Hearst Building, 5 Third Street, Suite 707, San Francisco, CA 94103

cc:

Amanda Blosser, CA Office of Historic Preservation

Ric Borjes, Presidio Trust

Milford Wayne Donaldson, CA Office of Historic Preservation

Becky Evans, Sierra Club

Elaine Jackson-Retondo, National Park Service PWRO

Katherine Kerr, Advisory Council on Historic Preservation

Boyd de Larios, Descendents of Anza Portola Expeditions

Kryi McClellan, City of San Francisco

Betsy Merritt, National Trust for Historic Preservation

Brian O'Neil, Golden Gate National Recreation Area

Aaron Peskin, San Francisco Board of Supervisors

Paul Scolari, Golden Gate National Recreation Area

Gary Widman, Presidio Historical Association

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