



Landmarks Preservation Advisory Board

City and County of San Francisco • 1650 Mission Street, Suite 400 • San Francisco, California • 94103-2479

August 22, 2008

John Rahaim
Director of Planning
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103-2479

Regarding: *Presidio Trust Management Plan Main Post Update Draft Supplemental Environmental Impact Statement*, June 2008

Dear Mr. Rahaim:

The San Francisco Landmarks Preservation Advisory Board (Board) appreciates the opportunity to comment on the *Presidio Trust Management Plan Main Post Update Draft Supplemental Environmental Impact Statement*, June 2008.

On April 16, 2008, Presidio Trust staff responded to a request from the Board and provided an informational presentation to the Board on the proposed action and upcoming release of the DSEIS. The adverse impacts of the proposed project were of such a magnitude that the Board formally requested that the Planning Department direct the Board to review and comment on the DSEIS. At the August 20, 2008, meeting, the Board voted, without dissent (5-0 with one abstention), to provide the following summary and detailed comments on the DSEIS.

The Board recognizes that, as a National Historic Landmark, the Presidio is of exceptional national significance and is of unequalled significance in the City and County of San Francisco. In light of the current proposed action, the Board questions the Presidio Trust's adherence to its mandate from Congress which in part states:

as part of the Golden Gate National Recreation Area, the Presidio's significant natural, historic, scenic, cultural, and recreational resources must be managed in a manner which is consistent with sound principles of land use planning and management, and which protects the Presidio from development and uses which would destroy the scenic beauty and historic and natural character of the area and cultural and recreational resources. (Presidio Trust Act)

The Board does not believe the DSEIS is adequate because it does not fully evaluate the impacts to the National Historic Landmark District as a whole nor does the Board feel that Alternatives 2, 2A, and 3 are consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. The Standards clearly permit a historic resource to be given a new use, but they require "minimal change to the defining characteristics of the site." They also specify that "new work . . . shall be compatible with the massing, size, scale, and architectural features" of the historic resources. For the Board, the issues of "minimal change" and compatibility of the proposed new structures with the historic resources were central in its evaluation of the various alternatives.

The Board ranked the Alternatives 1, 2, 2A, and 3 in order of preference, with preference determined by the alternatives having the least adverse affect on the historic resources of the Main Post:

Most preferred:	Alternative 1
Next most preferred:	Alternative 3
Least preferred:	Alternative 2A
Unacceptable:	Alternative 2

Finally, the National Historic Preservation Act (NHPA) and National Environmental Policy Act (NEPA) processes provide information regarding federal projects and their impacts for the benefit of public disclosure. Separating Section 106 of the NHPA from the NEPA process complicates the public's ability to understand impacts and participate in the federal review process. The Board considers it inappropriate for the Trust to have issued the DSEIS and concluded the public comment on it *before* the Section 106 process. Due to the Board's concerns regarding the severity of the impacts to historic resources from the current proposal, the Landmarks Preservation Advisory Board would also like the opportunity to join the Section 106 process as an interested party.

Comments:

The rehabilitation and reuse of Ft. Baker may provide a model as to the outside limits of appropriate reuse. The existing buildings at Ft. Baker were rehabilitated for reuse, most with similar uses to the original, a few not. The new buildings are environmentally sensitive, are outside the historic core, are unobtrusive, and reuse sites of previous buildings. The parade ground, considered one of the most important historic distinguishing features, is left open and is planted with a drought-tolerant ground cover, which should be considered for the Presidio.

At the Presidio, the Main Parade Ground and the archeological site of El Presidio are without question among the most historically important and sensitive areas in the Presidio. The distinguishing features of the Main Parade Ground include the openness of the Main Parade Ground itself, the historic structures, and the historic trees. These features should be preserved and, as necessary, restored and rehabilitated, but the qualities that make them distinguishing features cannot be compromised without severely damaging the cultural landscape.

The primary distinguishing features of the Main Parade Ground are its openness (save for the two historic trees), its shape, and the relative modesty in scale and design of the buildings that define the parade ground. Any new buildings or landscaping that compromise these qualities of the Main Parade Ground are inappropriate and should not be considered. These comments apply to several of the proposals. Alternative 2A, for example, places a restaurant on the Main Parade Ground. This is inappropriate because it would compromise the openness of the Main Parade Ground. The new tree plantings proposed for the north-east side in several alternatives are inappropriate as they compromise the splendid isolation of the Centennial tree. The two historic trees should remain the *only* trees in the area. The ground level improvements along the proposed Anza Esplanade may be acceptable, but care should be taken in the choice of materials and any plantings, and any furniture should be kept to a minimum, so that there is no compromise to the sense of openness that is a central element of the cultural landscape of the Main Parade. Whatever is done at the Anza Esplanade should be barely visible from a hundred feet away.

Alternative 1. Alternative 1 would make a minimum of changes to the Main Post of the

Presidio. It would demolish 46,000 square feet and construct 110,000 square feet. Alternative 1 makes minimal changes to the Main Parade Ground or Old Parade, establishes a visitor orientation center and archaeology center in existing buildings, expands the current theater, replaces a demolished building with a new office building (no design presented), converts a former barracks to a hotel, locates an art museum in the current Commissary Building at Crissy Field, and converts two nearby existing buildings to a hotel. It also creates the Anza Esplanade along the eastern side of the Main Parade; see comments above on the importance of maintaining the openness of the Main Parade Ground.

The Board finds the proposed archaeological interpretation on the site of historic El Presidio to be interesting and potentially a valuable addition to the Main Post, but the information presented is very brief and does not indicate how archaeological resources will be protected once they are exposed.

Alternatives 2 and 2A: The Proposed Art Museum Building. The following comments apply to the *design* of the art museum that is proposed in both Alternatives 2 and 2A, based on the Board's evaluation of the proposed design as posed against the Secretary of the Interior's standards, especially those that specify "minimal change" and compatibility.

The proposal for the art museum as presented is inappropriate on several counts. The design has a variety of problems that break down into two categories: problems having to do with its monumentality and problems having to do with its style of design.

The Monumentality of the Proposed Design. Museums have several functions, the most important of which center around the safety and presentation of the artworks. Historically, the presentation of the artworks has been done from a variety of philosophical viewpoints, from a purely aesthetic attempt to create a profound experience through a particular ambience (the Isabella Stewart Gardiner Museum in Boston, the Calouste Gulbenkian in Lisbon), through relatively neutral settings so that any narrative or other aesthetic interaction is purely between the works themselves (MOMA in NYC, LACMA in LA), to a more scientific or archeological presentation where items are stacked up and presented as either specimens or loot (most 19th century or older museums). The proposed museum appears to be a museum of the second type, but in other circumstances this choice of presentation would mostly be an issue of concern between the client and architect. *None of these forms of presentation require that the museum building be monumental in design.* The fact that many museums older than 1900 are grand monuments that are foci of streets or plazas is largely due to the fact that many of the most prominent collections were (or are) royal or national collections and were housed in royal palaces (the Louvre, Paris, or the Hermitage, St. Petersburg) which were urban foci. The monumental function had nothing specifically to do with the art; it had everything to do with the class and power of the owners of the art. This circumstance of the origin of important European museums, in turn, influenced the design of other museums that did not have such an origin.

A monumental function for a museum may still be appropriate at times. The Archeological Museum in Mexico City has as one of its functions the presentation of a coherent narrative of how and why Mexico is and should be a nation. The presentation of this narrative and the housing of the evidence for it is a function of such importance to Mexican national identity that a monumental structure is completely appropriate. Any collection that is similarly considered a national treasure or an important part of a nation's or region's identity might similarly necessitate the monumental function. The monumental museum structures along the Mall in Washington, D.C., for example, hold the art, history, and natural history of the nation. A private collection, even one of phenomenal aesthetic value, which the Fisher collection apparently is, does not

require such a monumental function, and in fact, for such a collection, a monumental building is usually inappropriate. The aesthetically superior presentation for this sort of collection is the first of the methods presented above. If we look at the two museums mentioned as examples of this philosophy of presentation, the Gardiner presents itself as a grand mansion, not a palace. The second mentioned, the Gulbenkian in Lisbon, is a modern collection of buildings, but they are un-monumental modern structures, a setting which focuses on the pleasing presentation of the artworks in an environment of beautiful gardens and pavilions, creating truly one of the most enlightened museum-going experiences in the world.

It is not appropriate to build a new museum which has a monumental aspect at the head of the Main Parade Ground (either Alternative 2 or 2A) both because the collection will remain privately owned but is within a public park and because this monumental building has nothing to do with the history and meaning of the Presidio. Such a monumental structure will dominate and distract attention from the more modest historic structures that should be the focus of attention. It is possible that a non-monumental museum structure could be built in this location, but it seems unlikely to be successful considering the size required for a museum. A better solution would be to use the Gulbenkian Museum as a model, to find an area in the Presidio that is environmentally and aesthetically appropriate to build new structures or reuse one or more existing buildings in the way that the Dia:Beacon, Riggio Galleries in upstate New York have done in order to provide a non-monumental setting for the artwork, one which will concentrate on creating a profound aesthetic experience around the viewing of the artwork rather than present an outward display of the importance of the artwork. This would be the truly enlightened and “cutting edge” approach to a museum of this sort in the Presidio.

The Style of the Proposed Design. The style of the proposed building--the International style of architecture--makes a monumental museum structure at the proposed location doubly difficult. *One of the underlying premises of the International Style is that it represents a triumph over and displacement of all historical styles that went before it, a triumph variously explained in terms of technological and historical superiority (The Bauhaus, Le Corbusier, the Futurists), ethical cleanliness (Loos), or quasi-mystical notions about space (Gideon).* This triumphal aspect of what was called “Modern” design when this style first appeared almost a century ago is always implicit in the style. It has been very difficult, if not impossible, for “Modernist” architects to avoid this trap of aesthetic arrogance and to create buildings that are both beautiful and compatible with buildings of other styles. By compatible, we mean buildings that take their place in a setting as an equal, but do not seek to dominate the setting or invalidate the status of their neighboring buildings; buildings which seem to say, “we are all in this together.” This proposed design is not at all compatible in this respect, and with any “Modern” design it would be very difficult to pull this off.

The Secretary of the Interior's Standard for Rehabilitation Number 9, for new additions, states, “The new work will be differentiated from the old,” but goes on to say, “and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.” It is sometimes the case that the mandate to “differentiate the new from the old” is carried to such an extreme that a proposed addition is no longer compatible with maintaining the integrity of the historic resource, and this appears to us to be the case here. In the hearing of July 14th, it was suggested by some speakers that the extraordinary design of the building and opportunity for the museum should supersede compliance with Rehabilitation Standard 9. While the proposed design for the Museum appears to be a fine Modern museum, it is a *traditional* Modern design, one well within the mainstream, and does not have the extraordinary originality that might justify setting aside the Standards. Likewise, the proposed locations for the Museum are very traditional, recalling an

18th century formal layout similar to the University of Virginia, and are not sufficiently innovative to be considered a special case. Indeed, a truly up-to-date and innovative approach to site planning is evidenced in the environmentally and historically sensitive site planning found at Ft. Baker. The DSEIS continues, "The Main Post is the only area that includes all eras of history as well as the original resource that resulted in the designation of the Presidio as an NHLD. Alteration or removal of the qualities that chronicle the history of this area may impact the NHLD as a whole. Because the new building as proposed would diminish the integrity of multiple contributing resources and aspects of the historic landscape, it would have a significant impact on the historic Main Post and potentially on the NHLD" (p. 148). The Board concurs with this evaluation, except to delete the word "potentially" as there would be a significant negative impact on the Main Post and on the entire National Historic Landmark District.

The Board concludes that the proposed art museum is not a "minimal change" and would not be compatible with the massing, size, scale, and architectural features of the historic Main Post buildings, and would therefore violate the Secretary of the Interior's Standards, which require "minimal change to the defining characteristics of the site" and specify that "new work . . . shall be compatible with the massing, size, scale, and architectural features" of the historic resources. The Board notes that similar conclusions have been reached by Milford Wayne Donaldson, State Historic Preservation Officer; Richard Moe, president of the National Trust for Historic Preservation; and Brian O'Neill, general superintendent of the Golden Gate National Recreation Area.

Other Elements of Alternative 2. Alternative 2 also proposes a lodge along the eastern side of the parade ground, and, like Alternative 1, a significant expansion of the existing theater. It would demolish 145,000 square feet (including the historic Red Cross building and a non-contributing bowling alley) and construct a total of 265,000 square feet. Again like Alternative 1, the historic Officers' Club building would become a visitor orientation center and archaeology center.

The Board finds the proposed lodge to be less objectionable than the proposed art museum, but concurs with the SEIS conclusion that "the size and scale of the proposed new building are larger than the remaining Civil War barracks buildings (buildings 86 and 87); the proposed building could adversely affect both of these buildings and because of its prominent location, the historic Main Post." Unfortunately, in the drawings the scale of these buildings relative to the existing buildings is unclear. The new lodge should not be taller or bulkier than the existing structures. The design itself seems modest and is broken into separate volumes, which are appropriate design tactics. There should be no new planting of trees associated with the lodge structures on the side of those structures that face the Main Parade or as part of the Anza Esplanade, as planting trees there would change the cultural landscape and diminish the significance of the two historic trees.

Other Elements in Alternative 2A. Alternative 2A is similar to Alternative 2, but would move the art museum to the south. It would demolish 161,000 square feet (including the non-contributing bowling alley but not including the Red Cross Building) and construct 265,000 square feet. The lodge would be smaller and a restaurant would be constructed on the parade ground.

The DSEIS states of this location, "Construction of a large museum on the site would introduce a new element into the historic setting that would be out of scale with the open space that existed through 1945. It would introduce a new visual presence in an area that had no distinctive presence during the period of significance" (p. 149). The Board concurs. So long as

the current, monumental building design is proposed, it is likely to dominate the Main Parade Ground visually, no matter where it is sited within the Main Post area.

Regarding the lodge proposed under this alternative, the Board has the same concerns as with Alternative 2 regarding the effect on the Civil War barracks buildings and the historic Main Post. The Board is disappointed that the DSEIS does not address the issue of placing a restaurant on the Main Parade, and suggests that a complete DSEIS must evaluate the impact of such placement on historic resources. See above for the importance of maintaining the sense of openness that is a central characteristic of the Main Parade.

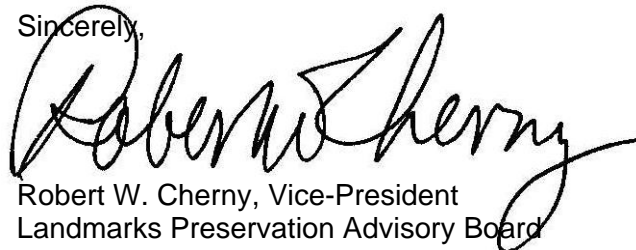
Alternative 3. Alternative 3 proposes a history center at the head of the parade ground. It would demolish 64,000 square feet and construct 77,000 square feet. It also proposes to locate the art museum north of the Fort Scott barracks and west of the Log Cabin, and to place a hotel nearby. Unlike the proposed art museum, the proposed history center is a lower building, non-monumental, and contextual rather than International in style. Its colors, size, and massing are more compatible with the historic structures on the Main Post, especially the Montgomery Street barracks and Pershing Hall, as can be seen by comparing the perspectives in Figures 40 (for Alternative 2) and 46 (for Alternative 3). From most locations within the Main Parade, the Montgomery Street Barracks would continue to dominate the west side of the Main Parade, and the proposed history center would not block views of Infantry Terrace. Nor would it, by its placement, size, or color, overwhelm the Officers' Club. While this may not meet the test for "minimal change," it is clearly more compatible with the existing historical resources.

Placing the proposed art museum at Fort Scott would not disrupt any existing views or cultural landscapes, as it would replace a storage and staging area.

Alternative 4. Alternative 4 is the status quo.

At the informational briefing on April 16, one Board member asked if the size of the proposed construction violated the Presidio Trust's mandate only to replace demolished buildings. The reply was that demolition elsewhere on the Presidio had been, and would be, "banked" to justify the amount of construction on the Main Post. However, members of the Board who attended the public comment on July 14 heard statements indicating that a federal judge has interpreted the relevant statutes to hold that such banking is not permitted and that the statutes require a "one down, one up" approach to demolition and new construction. If this is correct, then this legal question must be resolved or all other issues may be mute. The Board was surprised that such legal questions had not have been resolved prior to this point in the process.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert W. Cherny". The signature is fluid and cursive, with a large initial "R" and "C".

Robert W. Cherny, Vice-President
Landmarks Preservation Advisory Board