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DEPARTMENT OF PARKS AND RECREATION**

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September 10, 2008

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

Dear Mr. Middleton:

Thank you for the opportunity to comment on the Draft Finding of Effect (dFOE) for the Presidio Main Post Undertaking. It is most useful to comment while this important document is still in draft form, and I thank you for giving us that opportunity.

The Office of Historic Preservation has grown accustomed to receiving high-quality documents from the Presidio Trust and this document is no exception. While we may disagree with some of its conclusions, we recognize that the report was prepared in a professional manner.

***General Comments***

In general, this dFOE represents a workmanlike application of the Criteria of Adverse Effect and the Secretary of Interior's Standards for the Treatment of Historic Properties to a range of undertakings at the Presidio. The document applies these criteria in a straightforward manner, hindered only by a lack of specificity about three major undertakings: the Contemporary Art Museum at the Presidio (CAMP); the Lodge; and Theater expansion.

A general shortcoming of this document, as will be pointed out throughout this letter, is that it makes assumptions about the specifics of major project components, assumptions that cannot be supported by facts at this time. Some project elements may be adverse or not adverse, depending upon the details of the design.

A second general point, also emphasized throughout this letter, is that, while all alternatives result in an adverse effect, the degree of adversity is not equal across the alternatives. Alternative 2, the "Proposed Action" for NEPA purposes, causes the highest degree of adversity; it is not one among equal alternatives in this regard.

A final general point is that the document is sorely in need of additional graphics. Even the most experienced student of the Presidio of San Francisco cannot keep track of

building locations by number or street address. This document can be read and understood only by linking it with the Draft Supplemental Environmental Impact Statement (SEIS) for the Main Post projects. The dFOE should either include plans and maps or be clear in its introduction that it must be read in conjunction with the SEIS.

### ***Comments on Criteria for Assessing Effects***

The dFOE establishes a complex matrix for assessing effects, built around five major project alternatives; individual components of each of the five alternatives; six major project characteristics that may or may not result in an adverse effect; and four characteristics of new construction that may or may not result in an adverse effect. The analysis is complicated by the fact that so many elements are under consideration at any one time.

While it requires a careful read, this analytic matrix is useful and effective. It also allows for a “cafeteria” approach to project elements, i.e., individual components of the five major alternatives may be analyzed independently and the analysis recombined, mixing different components from different alternatives.

### ***Comments on the Analysis of Alternative 1***

Alternative 1 is considered the “no action” alternative for NEPA purposes because it is largely consistent with the 2002 Presidio Trust Management Plan, or PTMP. It is not clear that every detail of Alternative 1 was considered in the 2002 document. The expansion of the Theater, for example, was likely contemplated in 2002 but does not appear explicitly in the 2002 PTMP.

The alternative is held to constitute an adverse effect, chiefly because it involves demolition of two small garages behind Montgomery Street (Buildings 113 and 118). The alternative also proposes construction of additions to two contributing buildings: the Theater (Building 99) and the Chapel (Building 130). These additions are held not to represent adverse effects because the additions would be consistent with the Secretary’s Standards. Finally, the alternative contemplates construction of a 57,000 square foot new office building immediately south of Building 34, along the eastern edge of the Main Parade Ground. This new construction is held not to constitute an adverse effect because it will be consistent with the Secretary’s Standards.

It is clear that this alternative – continuing with the general directions provided in the 2002 PTMP – results in relatively minor adverse impacts to the Main Post. The two demolitions involve minor buildings. It is premature to conclude, however, that the additions to the Theater and Chapel could be accomplished without causing adverse effects. The commitment of the Presidio Trust to use the Secretary’s Standards increases one’s confidence that the additions could be made in a manner that minimizes or avoids an adverse effect but OHP cannot agree at this time that adversity can be avoided. Similarly, it is premature to conclude that the 57,000 square foot office building along Graham Street would not constitute an adverse effect, although the commitment of the Presidio Trust to use the Secretary’s Standards is a hopeful sign.

## ***Comments on the Analysis of Alternative 2***

This alternative is identified as the “Proposed Action” in the SEIS for the Main Post. This alternative is held to constitute an adverse effect based upon two types of adverse impacts: demolition of buildings to support new construction, parking improvements, and archaeological interpretation; and new construction that cannot be made to conform to the Secretary’s Standards.

In terms of demolition of contributing buildings, Alternative 2 would go far beyond what was contemplated in the 2002 PTMP. Buildings 113 and 118, slated for demolition in the PTMP, would be demolished to expand parking, as would Building 386. Buildings 40, and 41 (World War II era barracks) would be demolished to make room for an archaeological interpretive program. Building 3, also a World War II era building, would be demolished to establish Funston Avenue’s original alignment. Finally, Buildings 96 and 97 would be demolished to create a building site for the proposed CAMP.

Alternative 2 also includes additions to the Theater and Chapel, changes also proposed under Alternative 1. The comments about these additions, made under Alternative 1, apply to Alternative 2 and all other alternatives.

The distinctive aspect of Alternative 2 is that it contemplates two very large new buildings: the CAMP, at 100,000 square feet; and the Lodge at 95,000 square feet. The dFOE concludes that the CAMP would constitute an adverse effect because it is inconsistent with the Secretary’s Standards, diminishing the integrity of the Presidio through changes to the setting, feeling and association of the Main Post generally and specifically to the buildings near the south end of Main Parade.

The dFOE conclusion regarding the Lodge, however, is somewhat ambiguous. It finds that the Lodge would not result in an adverse effect for its design because it “could conform” to the Secretary’s Standards. It does find, however, that the Lodge would result in an adverse effect because the height and width of the new buildings would overwhelm Buildings 86 and 87, Civil War-era barracks situated along Graham Street north of the Lodge site.

The conclusions about the adverse impacts of CAMP and the Lodge appear to be supported by the facts, as they are presented in the dFOE and the SEIS. On one hand, we do not know the specific design of either project and cannot conclude definitively that neither could be made to conform to the Secretary’s Standards in that regard. The massing and scale of the buildings, however, cannot be overlooked. It would be difficult to see how the 100,000 square foot CAMP would constitute anything but an adverse effect, particularly if it were sited and built in the frankly modern design shown in the SEIS. As I noted in an earlier letter, the museum as planned would be so radically out of place in terms of design, materials and scale that it is difficult to imagine how it could be made to conform to its setting.

Similarly, it is difficult to imagine how the 95,000 square foot Lodge would not constitute an adverse effect on Buildings 86 and 87, if built to the scale and massing called out in the SEIS.

In general, the dFOE does a good job of specifying the ways in which this alternative can be seen as causing an adverse effect, particularly through increased demolitions and the adverse indirect effects of very large new construction.

### ***Comments on the Analysis of Alternative 2A***

Alternative 2A is described as being identical to Alternative 2 “except that the proposed site of the contemporary art museum is in the area south of Moraga and north of Infantry Terrace... and the lodge proposal is broken up into a cluster of buildings on the east and west sides of Anza Street.” That being the case, all above comments on Alternative 2 apply to Alternative 2A, except with respect to the CAMP and Lodge proposals.

Referring to CAMP, the dFOE concludes that moving the building south of Moraga would reduce the impact from adverse to no adverse effect, except for the indirect impact to the Officers’ Club (Building 50) and Theater (Building 99). The dFOE does conclude that this adverse effect “could be minimized, however, by setbacks and design guidelines for the new structure.”

The logic of the dFOE conclusions appears to be sound to the extent that moving the building south would diminish setting and feeling and association impacts to the Main Parade area. There is also merit to the argument that adverse effect to the Officers’ Club and Theater “could be minimized” through setbacks and other efforts to reduce the visible presence of the new building.

While we agree with that moving the CAMP away from the Parade Ground would reduce its impacts, OHP cannot agree that moving the CAMP to the south would eliminate the adversity, particularly if the alternative site is immediately south of Moraga. The impact of this very large building has to do with its scale and its frankly modern design, and these impacts will not go away by crossing Moraga. Until we know more about the massing of the building and its design as well as the specific alternative location, we are unable to agree that the new location would substantially diminish the adverse effect.

With respect to the Lodge, it is not clear that the project description in the dFOE is consistent with that in the SEIS. In the SEIS, the Lodge proposal is described as identical to that in Alternative 2 except that “the height of the proposed southernmost lodge building between the Old and Main Parades would be reduced to two stories (reducing the overall size of the lodge to 87,500 square feet).” The lost square footage would be regained by constructing a freestanding restaurant west of Anza Street.

In the dFOE, however, the Lodge proposal is described “broken up into a cluster of buildings on the east and west sides of Anza Street.” This description is ambiguous. Does it describe one large 87,500 square foot building east of Anza and a 10,000 square foot freestanding building west of Anza, as described in the SEIS? That would appear to be the case because the simulations on page B-11 of the dFOE show a Lodge that is identical in Alternatives 2 and 2A.

It is important to clarify this point because the dFOE makes a substantially different finding for the Lodge under Alternative 2A, as opposed to Alternative 2. In both cases, the design was found to have no adverse effect. In assessing impacts to location and setting, however, Alternative 2 was found to result in an adverse effect while Alternative 2A did not. This, however, appears to result from moving CAMP beyond Moraga, lessening the cumulative impact of the two large buildings existing in close proximity.

Under feeling and association, the effect goes from adverse under Alternative 2 to not adverse under Alternative 2A. The difference in this case appears to relate to the stepping down of the main Lodge building. The verbal description, however, refers to “reducing the height of the proposed southernmost lodge building,” the portion of the Lodge that is furthest from the Civil War barracks, Buildings 86 and 87. The Alternative 2 adverse effect of the Lodge, however, had to do with proximity impacts to Buildings 86 and 87. It is unclear how reducing the height of the southern part of the Lodge would diminish that impact.

It would be helpful if this section of the dFOE were rewritten to clarify whether the Lodge proposal is the same in the DEIS and the dFOE, a crucial point because it affects to Finding of Effect. It would also be useful to clarify how the changes to the Lodge massing between Alternatives 2 and 2A diminish impacts to the Main Parade buildings, especially Buildings 86 and 87.

On balance, we agree with the logic of the dFOE that moving the CAMP to the south would diminish its impacts but do not agree that it would eliminate adversity. We are troubled by lack of clarity as to the design of the Lodge. It is impossible for us to conclude that Alternative 2A would not cause an adverse effect, based upon information available at this time.

### ***Comments on the Analysis of Alternative 3***

The impacts of Alternative 3 are identical to those for Alternative 1 with two exceptions: construction of a History Center at the site of the bowling center (the CAMP site under Alternative 2); and construction of a CAMP-like museum outside the Main Post. All comments about Alternative 1 apply to Alternative 3, except as noted.

The History Center is seen as causing an adverse effect for its design as well as its effect on the setting, location and feeling and association. The adverse effect appears to relate to the introduction of new “contemporary” construction in such close proximity to the Montgomery Barracks and Buildings 99 and 50.

The conclusion follows the general logic used in assessing the impact of CAMP under Alternative 2, which includes contemporary new construction at the same site. The History Center, however, is seen as being 50,000 square feet, exactly half that of the CAMP. While we could agree that the History Center would likely cause an adverse effect, the differences in scale must be kept in mind.

The dFOE also addresses the impacts of a CAMP-like museum in the Fort Scott area of the Presidio. It concludes that this would result in an adverse effect to location and setting as well as the feeling and association of Fort Scott. Unfortunately, the dFOE

includes no accompanying material – schematic plans, simulations, or other such graphics – to support this conclusion. We are unable to agree or disagree with this conclusion in the absence of supporting documentation.

#### ***Comments on the Analysis of Alternative 4***

This alternative is status quo, without completion of the PTMP projects discussed under Alternative 1. This is held to have no effect on historic properties and we agree with that finding.

#### ***Comments on the Analysis of Archaeological Impacts***

This dFOE does a good job of analyzing potential impacts to archaeological resources from the various alternatives and project components, although these impacts are not known with precision. We agree with the logic that substantial new construction associated with the CAMP and Lodge in an archaeologically sensitive zone would likely result in adverse effects to identified sites.


#### ***Comments on the Analysis of Cumulative Impacts***

We are less than satisfied with the approach taken in this dFOE in analyzing the cumulative impacts of the various alternatives. The dFOE attempts to weigh the impacts of components of each alternative in light of other work that has been accomplished at the Presidio since 1993. Many of these projects were accomplished years ago and have little bearing on the cluster of undertakings contemplated in these alternatives.

Of more interest to this office and, I believe, to the general public, is the cumulative impacts of the various project components addressed in the dFOE itself. The Lodge, for example, would have one type of impact if it were built alone and quite another impact if it were to be bookended with the CAMP. The addition to the Theater similarly would have a different impact if it was to be built in conjunction with construction of CAMP. We are frankly more concerned about the cumulative impacts of the projects described in this dFOE than with the cumulative changes since 1993. This section of each alternative would be much more useful if it focused on the specific group of undertakings treated in this dFOE.

Again, I want to thank you for affording me and my staff the opportunity to review this document in draft form. I hope these comments will be useful in making the final FOE an improvement over this draft. If you have any questions about this letter, please do not hesitate to call me.

Sincerely,



Milford Wayne Donaldson

Milford Wayne Donaldson, FAIA  
State Historic Preservation Officer