

RESPONSE TO COMMENTS

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4.9 HISTORIC RESOURCES (HR)

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PRESERVATION AND PROTECTION OF THE NHLD

HR-1. Commitment to Protect the National Historic Landmark District

Several historic preservation and environmental organizations, including the National Trust for Historic Preservation, the Fort Point and Presidio Historical Association, and San Francisco Architectural Heritage, as well as the NPS, express concern about the lack of a clearly stated commitment by the Trust to avoid adverse effects on historic resources of the Presidio National Historic Landmark District (NHLD). They request a stronger commitment to the application of the Secretary of the Interior's Standards for Rehabilitation, and that the Trust "should not tolerate any project that will impair the integrity of the Presidio as a NHLD." Commentors express concern about the Draft EIS conclusion for the Draft Plan Alternative that it could have "significant adverse effects on individual historic resources or the NHLD." The concern

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for potential adverse effects, as stated in comments, is largely due to the Plan's unspecified proposals for building demolition and new construction. Commentors recommend that the PTIP and EIS should be amended to state that in considering proposed projects, avoiding such adverse effects will take precedence over meeting financial and other goals. Other commentors express the opposing view that "You need to only pick 50 historic buildings and demolish/neglect the rest if you ever hope the park to be profitable."

Response HR-1 – The Final Plan reflects a strong, clear commitment by the Trust to the protection of the NHLD, and the EIS analysis has been amended to indicate that the Final Plan Alternative would avoid adverse impacts affecting the status and integrity of the NHLD. The Trust commits to preserve the NHLD and will give the highest priority to actions that carry out the preservation, rehabilitation, and use of historic buildings and landscapes in accordance with the Secretary of Interior's Standards for the Treatment of Historic Properties (which includes the Standards for Rehabilitation). This commitment is stated throughout the Final Plan, and most explicitly in Chapter One: Preserving and Enhancing Park Resources, where the planning principles for cultural resources are found. As part of the re-organization of the Final Plan, in response to public comments and concerns about the Draft Plan, the section on cultural resources is the very first section in Chapter One. In addition, the PTMP's Chapter Four: Plan Implementation includes a more detailed discussion on future project implementation, public involvement, and agency consultation in decision-making. See Figure 4.3, which describes and illustrates the general process for public involvement anticipated for specific categories of planning and implementation activities. The Trust will ensure public review of proposed projects that have the potential to adversely affect historic resources and has entered into a Programmatic Agreement (PA) (Appendix D of the Final EIS) with the California State Historic Preservation Officer, the Advisory Council on Historic Preservation, and the NPS to identify the consultation and input process for projects that may affect cultural resources. The National Trust for Historic Preservation and the Fort Point and Presidio Historical Society are also signatories to the agreement.

The PTMP is a programmatic-level document and in most cases does not specify individual building and site treatments. Rather, it provides a framework and guidance for future decision-making. Where this policy

framework specifies preservation of the NHLD, it cannot preclude the possibility that in the future individual projects may be proposed that would adversely affect individual historic resources. This is because the feasibility of rehabilitation and reuse (both physical and financial feasibility) of all buildings has not been thoroughly assessed, and because the Trust Act requires the Presidio Trust to consider demolition of historic buildings under certain conditions. For these reasons, and because specifics about building demolition and new construction beyond what is presented in the Final Plan are not known, the Plan commits to maintaining quantitative and qualitative standards, as well as providing processes for public involvement and for historic compliance consultation to help ensure protection of the NHLD status.

The Trust would comply with Section 110 of the NHPA, which states that a federal agency must "to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm" to a National Historic Landmark that may be directly or adversely affected by an undertaking.

Economics is one of the factors considered in the management of historic buildings for any federal agency. The Presidio Trust Act states that "Removal and/or replacement of some structures must be considered as a management option in the administration of the Presidio." Economic feasibility, or cost-effectiveness of rehabilitation and reuse, will not be the only factor used in deciding the fate of a historic building, however; it will be just one of many criteria used in the decision-making process. Other factors include the viability of constructive reuse, building condition, the amount of historic fabric or integrity of the building, and relationship to other plan objectives.

HR-2. Preservation of the Presidio's Unique and Historic Character

Many commentors recognize that the Presidio is a national park of unique beauty, as well as a historic former military post of great importance to both the region and the country. Some commentors would like the Final Plan to state a commitment to maximum historic preservation of the Presidio's unique character. Other commentors request that the PTMP establish specific means to minimize adverse effects caused by new construction and reinforce existing character-defining features, express concern that the level of new construction

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as envisioned by the Trust may threaten the NHLD or jeopardize the Trust's mandate to protect and preserve the park's historic and cultural values and character. Other commentors ask that the Trust keep the Presidio as is, except for selective removal of buildings with no historical or architectural merit to create more open space, and rehabilitation of the remaining buildings and preservation of the building exteriors to perpetuate the "look" of the Presidio.

Response HR-2 – The Final Plan articulates the preservation and protection of the park and its resources as the primary mission of the Trust, and is intended to ensure that the Presidio of the future will have much the same "look" and character as the Presidio of today. Chapter One of the Final Plan focuses on preserving and enhancing park resources that make the Presidio such a special place. These resources include not only the contributing structures to the NHLD but the historic landscape as well. The Trust's overarching aim will be to preserve and enhance the Presidio's resources and to provide a meaningful experience for park visitors. The planning principles presented in Chapter One of the Final Plan will guide the Trust's future actions and decisions regarding management of the Presidio's cultural, natural, scenic and recreational resources. With regard to the built environment, and to further the protection of the NHLD, an emphasis of the Trust's activities will be adaptive reuse of historic buildings. Rehabilitation of historic buildings will be guided by the Secretary of the Interior's Standards for Rehabilitation and the Guidelines for Rehabilitating Buildings at the Presidio of San Francisco. In addition, the Trust will ensure that any changes to a site near an historic building cluster that are made to accommodate new uses are compatible with the historic setting and protect the integrity of the designed landscape areas. Please refer to Figure 1.1 of the Final Plan, which illustrates designed landscape areas and historic buildings.

With regard to concerns about the amount of new construction and its effects on the integrity of the NHLD, Planning Principles 1 and 2 address the issues of protecting the NHLD while changes occur within the Presidio's cultural landscape, and offer guidance for compatible new construction. In response to public comments, the Final Plan has been modified to provide more information on new construction and why it might be proposed in the future. Non-residential new construction will primarily be undertaken as a means to encourage reuse of historic buildings – to enhance the function of existing

historic buildings or to make their rehabilitation and reuse economically viable. Limited residential new construction would be considered to achieve plan objectives, such as housing Presidio-based employees. In all cases, new construction would replace building square footage that is removed. New construction may include building additions, an annex adjacent to an existing building, infill buildings set within an existing cluster of buildings, or stand-alone structures in developed areas. Also refer to Responses HR-11 and HR-13, as well as the responses to New Construction comments for more discussion of this subject.

With regard to concerns about the effect of new construction on the Presidio's character, the Final Plan states that new construction will only occur in existing areas of development and will be sited to minimize impacts on adjacent resources. New construction will be used to reinforce historic character-defining features of an area, and its design will ensure that the association, feeling, and setting of the significant elements and the integrity of the NHLD are protected. Chapter Three of the Final Plan includes the identification of key character-defining features of each planning district and planning guidelines that would form the basis for future changes, which may include new construction. The guidelines conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties.

Coupled with the Final Plan's text about new construction, the Trust is also committed to a process for public input for projects involving new construction. Projects that involve any new construction beyond the most modest building addition will be subject to public notice, outreach and consultation, public "scoping," and public review of specific design guidelines and/or schematic design, as well as environmental documents, prior to any decision about whether to implement the project. Also refer to Responses PI-1, PI-2 and PI-10.

HR-3. Effectiveness of Planning Principles in Avoiding or Reducing Impacts on the NHLD

Commentors, including environmental organizations and the NPS, express concern that impacts of new construction cannot be effectively reduced or eliminated because the planning guidelines of the Draft Plan are stated as discretionary rather than binding, the overall square footage cap established

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by the Draft Plan can be exceeded, and the Secretary of the Interior (SOI) standards need only be met to the “maximum extent feasible.” Concern was expressed that the Draft EIS contains no evaluation of the effectiveness of the planning principles, planning guidelines, and SOI standards in reducing or avoiding adverse impacts. The NPS further recommends that effectiveness of these provisions should be analyzed for all of the alternatives. A recommendation is made that the planning principles and planning guidelines should be adopted as mitigation measures. Lastly, a request is made that if the planning principles and planning guidelines are to be used to mitigate potential impacts, as stated in Table S-1 and in the Environmental Consequences section of the Draft EIS, the principles and guidelines need to be included in the EIS and assessed for effectiveness in protecting cultural resources and the NHLD status.

Response HR-3 – In the Final Programmatic Agreement (PA), the signatories, including the ACHP, SHPO, and NPS, acknowledged that PTIP is a programmatic document that presents a range of preferred land uses and is intended as a policy framework to guide the Trust’s future activities. The PA states that the planning principles and planning guidelines conform to the Secretary of the Interior’s Standards for the Treatment of Historic Properties and will be a means for assessing the effects of future projects in individual planning districts and the overall NHLD. “The Trust shall ensure that future planning documents conform to the Standards (SOI), the Principles, and any applicable Planning District Guidelines to the maximum extent feasible” (PA, Sec. X, A.). A process for review and consultation of future planning projects that may have an adverse effect on the NHLD is also set forth in the PA.

For clarification regarding the Standards for Rehabilitation, it should be noted that the preface to the standards state “the following (standards) are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility” (Secretary of the Interior’s Standards for Rehabilitation). It is the interpretation of this preface that supported the Draft Plan’s statement that the standards need only be met “to the maximum extent feasible,” acknowledging that in some cases of rehabilitation the standards may for one reason or another not be met. However, in response to the concern raised, the language “to the maximum extent feasible” has been removed from the Final Plan when used in

conjunction to the application of the standards, though the phrase remains in the Final PA as cited above.

In response to public comments, the cultural resources section of the Final EIS has been expanded to include a district-by-district description of actions proposed under each alternative, including the maximum allowable demolition and new construction. As requested, a discussion of the planning principles and planning guidelines is also provided. Please refer directly to Section 4.2.1 (Historical Architectural Resources and the Cultural Landscape). Consistent with the commentor’s suggestion, conformance with the planning principles and planning guidelines is required by Mitigation Measure CR-4 (as presented at the end of Section 4.2.1 of the Final EIS).

TREATMENT OF HISTORIC BUILDINGS

HR-4. Demolition of Historic Buildings

Commentors request that the PTMP as well as the PA make a commitment that no building or structure listed as part of the National Register nomination would be demolished. Commentors are concerned that the potential for demolition of historic buildings could jeopardize the integrity of the NHLD and that minimizing demolition would help preserve archeological resources, historic buildings and sites, and the Presidio’s unique character. Some commentors feel that the only historic buildings that could justifiably be removed are those listed in the 1994 GMPA. The Council on America’s Military Past expresses concern over the statement in the Draft Plan that “Through future planning, the Trust may identify compelling reasons for removing some buildings that contribute to the NHLD” and that no such removal can be justified. Commentors suggest that since all of the Draft EIS alternatives meet the stated financial requirement of the Presidio Trust Act, no removals of historic buildings or structures other than those in the 1994 GMPA can be justified. Others acknowledge that although the Trust Act does have provision for reviewing historic structures for demolition, the Trust is still required to adhere to the NHPA and evaluate the effect of further demolition on the integrity of the NHLD.

Response HR-4 – The language of the Final Plan reinforces the Trust’s commitment to the preservation of the integrity of the NHLD. The very first

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planning principle in Chapter One states “Protect the historic character and integrity of the NHLD while allowing changes that will maintain the site’s vitality. Rehabilitate historic buildings compatibly for adaptive and feasible uses.” However, the Presidio Trust Act does include language that states “Removal and/or replacement of some structures within the Presidio must be considered as a management option in the administration of the Presidio.” For this reason, the Final Plan cannot preclude the possibility of demolition in the future. The PA lays out a consultation process with agencies and interested parties for any such future proposed action in compliance with the NHPA. Chapter Four of the Final Plan also describes the public input and additional analysis required before demolition could occur.

While the Trust commits to minimizing any demolition of historic buildings, and has strengthened its commitment to preserve the NHLD, there is the possibility that at some point in the future the Trust may consider the demolition of some historic buildings. When considering historic building demolition, the Trust will base its decision on other resource values (such as preservation of an adjacent resource or rehabilitation of an historic setting) and criteria such as historic and architectural significance, integrity, cost-effectiveness of rehabilitation, feasibility of reuse, and other plan objectives. Refer also to Response HR-6. One potential example is the retention or potential removal of Buildings 40 and 41, World War II temporary barracks at the Main Post that are right in the middle of the historic archeological resource, El Presidio. Many members of the public have suggested that these buildings should be removed in order to allow for the preservation and interpretation of El Presidio. See Response PG-16. The Trust will also consider alternatives to full demolition, such as relocation or partial demolition with some new construction.

The Council on America’s Military Past’s specific citation from the Draft Plan has been modified in the Final Plan to read, “The Trust may, at some time, find compelling reasons for allowing historic and non-historic building removal, building additions, or other new construction” (Planning Principle 2, first paragraph). For any potential removal of a contributing building, the Trust would be subject to Section 106 of the NHPA as well as NEPA, and would provide for public input in the decision-making process. Please refer to

Chapter Four of the Final Plan for a discussion on public involvement with future actions.

HR-5. Commitment to Adaptive Reuse of Historic Buildings over New Construction

Commentors request that Trust make a clear commitment to adaptive reuse of historic buildings over demolition or new construction. Commentors suggest that a full range of options to reuse, which may include allowance for building additions, interior renovations, or relocation of structures, be considered before demolition or new construction. The National Trust for Historic Preservation requests that the Trust make a clear commitment to, rather than just an “emphasis” on, evaluating historic structures for adaptive reuse, and that if reuse in conformity to the SOI standards is not feasible, other options short of demolition be evaluated. These evaluations should be made available to the public. The concern is that, as implied in the Draft EIS, if buildings cannot be rehabilitated in accordance with the standards, demolition would be the only other option. Both the NPS and the National Trust request that, in order to protect and preserve the integrity of the NHLD, the Trust consider demolition of historic buildings only as a last resort and only on a case-by-case basis.

Response HR-5 – In response to public comment, the Plan has been strengthened to articulate the Trust’s commitment to the preservation of the Presidio’s NHLD status. In addition, Chapter One of the Final Plan states that 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. An example would be the construction of an addition to an historic building, or an adjacent annex, in order to make the rehabilitation of the historic building economically feasible. The Plan also now states that the Trust will undertake as little new construction and as little demolition of historic buildings as possible, and will solicit input from the public, as well as historic preservation agencies, in the decision-making process.

As suggested by the commentors, the Plan does allow that a full range of options to demolition of historic buildings be considered. As described under Planning Principle 2, these options include building additions, relocation, or

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partial building demolition coupled with some new construction; they could also include significant alteration to a building's interior to accommodate a new use or rehabilitation that is not wholly consistent with the SOI standards.

The decision-making process for these building treatments will be on a case-by-case basis and will be multi-faceted, not based solely on the cost-effectiveness of rehabilitating a building to meet the Secretary of the Interior's standards. Factors to be considered will include historic and architectural significance, building integrity, economic feasibility of rehabilitation, and feasibility of reuse, among others. Also see Response HR-6 below. Chapter Four of the Final Plan provides details about the Trust's commitment to public participation in decision-making on future actions that include historic building demolition and new construction. Demolition of historic buildings will be subject to public notice, outreach, and consultation with historic preservation agencies (as stipulated in the Programmatic Agreement), as well as public review of environmental documents prior to any decision to implement the project.

HR-6. Concept of Feasibility for Reuse

The National Trust for Historic Preservation requests that the Trust define the meaning of "cost-effective" and "feasible" in the evaluation criteria applied for building reuse. Specific references were made to the Draft Plan's Planning Principle 5 (Building Management). The concern is that there should be a measurable standard for assessing cost-effectiveness, taking into account building codes and economic incentives for historic buildings, and that profitability should not be the overriding deciding factor. The National Trust also indicates that a record of individual building assessments should be available to the public and that in no case should preservation of historic resources be subordinated to financial considerations. The Council on America's Military Past asks the Trust to delete Planning Principle 5 from the Draft Plan because it violates the GGNRA and Trust Acts.

Response HR-6 – The terms "cost-effective" and "feasible" are used in their common sense, and both convey Trust Act requirements and imply careful consideration before decisions are made regarding specific building treatments. Consistent with the Final Plan, detailed building-specific analyses would be required before it is determined that an historic building can or

cannot be rehabilitated and revised. These analyses would necessarily include an assessment of physical feasibility, a cost estimate and comparison to projected revenues, and consideration of other strategies to preserve and reuse the buildings. Evaluation criteria would be tailored to the specific circumstances. Profitability, or cost-effectiveness, of a building's rehabilitation will not be the only criteria used in determining a building's fate. A variety of criteria and resource values will come into play when the Trust must decide whether a historic building will be demolished or not. The language cited in the planning principle (Planning Principle 5 in the Draft Plan and Planning Principle 2 in the Final Plan) is a direct quotation from the Presidio Trust Act, which states that the Trust must consider "demolition of structures which in the opinion of the Trust, cannot be cost-effectively rehabilitated..." The text that follows the planning principle has been modified, however, to clarify the intent and decision-making process for historic building demolition. Chapter Four then explains the financial challenges and context in which the Trust would be making these decisions, and includes a description of the public involvement process for such projects. Finally, the Trust recognizes that tenants may not be found immediately for all of the buildings targeted for rehabilitation; however, this alone will not warrant demolition. In such cases, the Trust will look to "mothball" or stabilize these historic buildings until such time as a tenant is found. Also see Responses HR-5 and HR-7.

HR-7. Building Stabilization and Ongoing Maintenance

Several historic preservation organizations comment that the Trust should commit to immediate stabilization and ongoing maintenance of unused and deteriorating buildings that contribute to the NHLD, as stipulated in Section 110(a)(2)(B) of the NHPA. The National Trust for Historic Preservation suggests that the planning principles be amended to make this commitment. There is concern about the visible deterioration of a number of historic buildings with architectural significance, and that stabilization and maintenance now will save money in the future when the buildings are rehabilitated. Another suggestion is made for the Trust to "mothball" buildings, rather than demolish them, until such time that they can be reused.

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Response HR-7 – The Trust agrees that a maintenance program for mothballing buildings will help preserve the historic buildings. As explained in Mitigation Measure CR-3 in the Final EIS (Section 4.2.1), the Trust is developing a cyclical maintenance program to prevent damage to historic fabric and ensure that buildings are well maintained until such time as they are rehabilitated and occupied. This program will include guidelines for mothballing, preserving, and monitoring vacant buildings, and will include directives for physical inspections and routine monitoring for deterioration. If deterioration is then identified, actions will be taken to arrest further impacts. Clearly, one of the Trust’s priorities for short-term implementation activities following the adoption of PTMP will be long-term leasing and rehabilitation of currently vacant historic buildings.

HR-8. Delay of Long-Term Leasing until District Planning is Completed

The NPS recommends that long-term leasing be delayed until district planning is completed. The concern is that the Draft EIS describes opportunities for a range of actions following the adoption of the Final Plan that will not require public review, including proceeding with long-term leasing of historic and non-historic structures and other projects. An additional concern is that the Plan identifies preferred land uses for each district rather than designated land uses. The NPS believes that a subsequent planning process is needed to provide enough information to determine the effect of long-term leases and specific uses on the overall development of districts and the park. In addition, commentors note that long-term leasing may proceed right after PTMP is adopted, stating “certain non-historic structures may be quickly leased and become unavailable to the pool of non-historic buildings that could be considered for demolition as mitigation to offset adverse effects to the NHLD.”

Response HR-8 – The Trust cannot refrain from long-term leasing if it is to attract tenants willing to invest substantial resources in the rehabilitation and reuse of historic structures. Sufficient detail is provided in the Final Plan Alternative, and has been analyzed in the EIS, to allow leasing of historic and non-historic structures without further Presidio-wide or district level planning. In each district, preferred land uses are identified, and parameters are set by planning district guidelines. Also, consistency with the PTMP is one of the

tenant selection criteria that will be used, and public notice of leasing opportunities will be provided. See Chapter Four of the Final Plan and Response TS-9. The commentor’s distinction between “preferred” and “designated” land uses is unclear, and the suggestion that additional planning is needed to determine the effects of long-term leases is unsupported. Preferred uses are those the Trust will seek out. If the preferred use cannot be satisfied (e.g., because the marketplace may not deliver the preferred use) other uses designated for the planning district could then be sought. The mix of uses allowed in each district has been fully analyzed in the EIS, so that selection of a use consistent with the allowable mix, the scope of the environmental analysis, the tenant selection criteria and other guidelines will satisfy the leasing and environmental review process. The EIS alternatives consider a range of possible land uses and land use intensities, and the EIS fully analyses the effects of these possibilities on traffic, air quality, historic resources, and many other aspects of the environment.

Long-term leases for historic buildings would be used in circumstances where a tenant would provide the financing and a long-term lease is required to amortize the costs invested in rehabilitation. The Plan has been amended to clarify the intent behind long-term leasing. See Chapter Four of the Final Plan. The Plan identifies one exception to its provisions for long-term leasing, and that is a study area within Crissy Field where options for the potential for marsh expansion are being evaluated. This detail was added to the Final Plan in response to concerns raised by the NPS. The Final Plan provides that no new construction or long-term leasing in the immediate study area will be undertaken for the next two years (the approximate duration of the study).

For each of the planning districts, the Final Plan provides a district concept, preferred land uses, maximum amount of square footage, levels of demolition and new construction, and planning guidelines. This information sets the framework for implementation activities, including both leasing and site-specific planning. In order to achieve the mandate of self-sufficiency by 2013, the Trust must continue focus on leasing buildings and rehabilitating historic buildings to preserve their integrity. The PTMP is a programmatic-level document and therefore does not specify individual building or site treatments. Assumptions about land use by district were made for purposes of

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the impact analysis of the EIS and follow the PTMP's direction for preferred land use designations.

Before undertaking projects that involve building demolition, new construction or significant changes to the Presidio's historic landscape, the Trust will solicit public input and conduct detailed studies and appropriate environmental analysis as part of the decision-making process. For those non-historic buildings that are slated in the PTMP for eventual removal (namely the Wherry Housing complex, and some other non-residential housing), a generalized timeline is included. See Chapter Four, Figure 4.2B, Long-Term Implementation: Generalized Timeline. Other non-historic buildings may be leased (either through short-term or long-term leases) to generate revenue or achieve other plan objectives. In no way will leasing of non-historic buildings alter the Trust's commitment to the rehabilitation and reuse of historic buildings, or make the task any more difficult than it already is. To the contrary, non-historic buildings may be leased for higher rents because they require fewer improvements, thus generating revenues necessary to undertake historic rehabilitation or natural resource enhancements.

HR-9. HABS vs. National Register of Historic Places Evaluation

A recommendation of many historic preservation organizations, as well as the NPS, is that the Trust should use the 1993 update of the Presidio NHLD nomination form as the base document for determining which historic structures contribute to the NHLD. The concern is that the HABS report has no basis in preservation law in that it was prepared for maintenance purposes and not for ultimate preservation decisions. "Although the 1985 HABS report is required by the Trust Act to evaluate whether the historic structures are economically viable for rehabilitation... use of the 1993 update would allow a reasoned, comprehensive assessment of impacts to park resources and would strengthen the Trust's commitment to preservation of the NHLD." Commentors note that while the HABS survey is specifically referenced in the Trust Act, it should not be the sole source for historic resource evaluation. Instead, the National Register nomination form should be used to determine what is significant and what is not. Several commentors note that the removal of NHL contributing structures (based upon the 1993 NHL update) may adversely affect the NHL designation, no matter what category the structures

are listed under in the HABS report. Finally, the NPS asserts that "Rather than reuse historic structures, the Presidio Trust is assuming removal of structures [pursuant to the study of economic feasibility of rehabilitation based upon the 1985 HABS report] that don't meet [as yet] undisclosed financial feasibility criteria and using the square footage to construct new structures."

Response HR-9 – The Trust agrees that the 1993 National Register Nomination Update form is the documentation of contributing and non-contributing features to the NHL status of the Presidio. The Trust will use this inventory as a baseline, balanced with other factors, for determining the significance of individual resources and the integrity of the overall district. The Trust identified the 1985 Presidio of San Francisco Historic Landmark District Historic American Buildings Survey (HABS) report in the Draft Plan because Congress specifically refers to it in the Trust Act. The Trust acknowledges that the 1985 HABS report was prepared for a purpose that is separate and distinct from that of the National Register form. The Presidio Trust Act requires the Trust to consider, for possible demolition or replacement, those buildings identified as Categories 2 through 5 in the HABS report. The Trust considers this section of the Trust Act to indicate the universe of buildings that must be evaluated, and not the criteria that must be used. As described elsewhere, many criteria will be factored into the decision-making process regarding individual building treatments. See Response HR-4. These factors will include criteria such as historic and architectural significance, integrity, cost-effectiveness of rehabilitation, feasibility of reuse, and relationship to other resource values and goals.

The Trust concurs with the comment that the removal of a contributing structure may have an adverse effect on the NHL. Thus, the PA outlines a process for review and consultation for any proposed demolition of an historic property within Area B. In addition, as stated in the Final Plan, demolition of historic buildings will be subject to public notice, outreach and consultation, public scoping, and review of environmental documents prior to any decision to implement the project.

HR-10. Preservation of Less Visually Appealing Historic Structures

The Council on America's Military Past comments that the Trust should give thoughtful care and attention in management and planning for the Presidio's

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industrial and warehouse-type buildings. “Historical significance does not necessarily equal architectural distinction or appealing and attractive appearance. Some of the rarest buildings at the Presidio are the warehouses and storehouses and aircraft hangars and shops, and other buildings of an industrial character...a whole streetscape of warehouses is even rarer.”

Response HR-10 – The Trust concurs that the diverse mixture of architectural styles and periods of construction of the buildings contribute to the Presidio’s status as a NHLD. While many of these buildings in and of themselves may not seem significant, it is when they are viewed in the context of a district that they are understood as contributing to the NHLD as a whole. Many utilitarian buildings are essential facilities for operating the Presidio today, while others, such as the Gorgas and Mason Street warehouses, are popular for leasing. One current example of reuse of an industrial building for a contemporary need is the proposed water recycling plant in Buildings 1040 (former powerhouse and steam plant) or 1063 (medical supply warehouse) at the Letterman Complex. The Trust is committed to preserving the Presidio’s diversity of building types, an important, character-defining feature of the NHLD.

NEW CONSTRUCTION

HR-11. *Minimizing New Construction*

Several environmental organizations and the NPS believe the Trust should carefully plan and keep new construction to a minimum to ensure the integrity of the NHLD. They voice concern about the Draft Plan’s proposed level of demolition and new construction, particularly in historic areas, and its potential to impair the integrity of the NHLD. The NPS states that “As a result, infill actions must be carefully planned and only pursued when they achieve goals central to the Presidio’s national park values, such as open space expansion, and do not negatively impact the park’s historic landmark status.” The Council on America’s Military Past believes “...one of the significant aspects of the Presidio is the relationship of one building to another and one subdistrict to another and their historic setting and historic scene and cultural landscapes.” Commentors note that while there may be a few places where infill construction may be appropriate, inserting new construction in sensitive historic settings (such as Fort Scott and the Main Post) would have an adverse effect on the NHLD. Some commentors indicate that it would be

preferable to locate new construction where non-historic groups of buildings are to be removed.

Response HR-11 – In response to concerns raised about new construction, the Plan has been modified in several ways. In Chapter One of the Final Plan, under the planning principles, language has been added to state that the Trust will undertake as little new construction and as little demolition of historic buildings as possible. The Trust will also make every reasonable effort to adapt historic buildings for new uses. In cases where the Trust considers non-residential new construction, it will do so primarily to encourage the reuse of adjacent historic buildings. In addition, the Final Plan cites examples of new construction to explain the form that new construction may take – a building addition, an annex adjacent to an existing building, infill construction within an existing building cluster, or a stand-alone structure in a developed area. These issues are discussed further in response to comments on new construction.

The Final Plan includes more descriptive text about where demolition and new construction may occur, by planning district. The text also clarifies the constraints on new construction that would ensure that its impacts are minimized. In Chapter Three, a maximum level of new construction and demolition is included for each planning district. New construction can only occur in previously developed areas and must be sited to minimize impacts on cultural and natural resources. The planning principles and planning guidelines (which conform to the Secretary of the Interior’s Standards for the Treatment of Historic Properties) together set the framework for consideration of any new construction proposed in the future, and provide a means to minimize adverse effects upon the NHLD. Also refer to Response HR-14 below. Every effort will be made to avoid an adverse effect on the NHLD, and the status of the NHLD will be protected. Chapter Four describes the public involvement process that the Trust anticipates for projects involving demolition and new construction. Future site plans will locate new facilities and discuss environmental consequences of specific actions and alternatives. Site-specific evaluations of new construction will consider building height, site design, building separation, architectural form, and articulation in relation to adjacent historic patterns of development. The design of new construction

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will ensure that the association, feeling, and setting of the significant elements and the integrity of the NHLD are protected.

Lastly, it is expected that most replacement construction would occur in areas where non-historic buildings are removed. As an example, at the Letterman Complex, one of the non-historic dormitories may be removed and replaced with more compatibly designed and more efficient housing. In other cases, however, the Final Plan commits to the restoration of open space and natural habitat through the removal of non-historic housing (namely Wherry Housing, some of the non-historic housing on West and East Washington Boulevard and in the East Housing district), rather than replacing these buildings with new construction.

HR-12. *Effect of Square Footage Cap on Demolition of Historic Buildings*

The National Trust for Historic Preservation and several others indicate that the Trust should not use an artificial cap on overall square footage as a justification for demolition of historic buildings and new construction. They make specific reference to the Draft Plan's goal to reduce the overall square footage for Area B to 5.6 million from its current 5.96 million. The National Trust's fear is that demolition of an historic building might be proposed in order to make room (under the overall square footage cap) for more lucrative new construction. Therefore, they recommend that new construction in the Final Plan be reduced in lieu of demolition.

Response HR-12 – In response to comments and concerns about the Draft Plan's language about the square footage cap and building demolition, the Plan has been amended and language strengthened. The Final Plan states that “over time, the Trust will decrease the building area in Area B from the current 5.96 million square feet to 5.6 million square feet or less.” This will be a net reduction of about 400,000 square feet. The cap on the reduced square footage is not a justification for demolition of historic buildings and an allowance for new construction. The majority of proposed demolition is in non-historic housing clusters (namely Wherry Housing, some of the West and East Washington Boulevard housing, and non-historic housing in the East Housing district, which make up 680,000 square feet of the proposed maximum demolition).

The Final Plan does allow for some new construction consistent with concepts presented in the Draft Plan. However, language has been added to the planning principles in Chapter One to state that “The Trust will undertake as little new construction and as little demolition of historic buildings as possible...” New construction would most likely take the form of replacement housing, and as a means to encourage rehabilitation of historic buildings. New construction will only occur in previously developed areas and may take the form of a building addition, an annex adjacent to an existing building, infill buildings within an existing cluster, or as a stand-alone structure. The Final Plan provides more detail than the Draft Plan did with regard to building demolition and replacement construction by planning district. Demolition and/or new construction will be subject to additional planning, analysis, and public input in conformance with NEPA and NHPA.

New construction is not necessarily a lucrative proposal, as the commentor has implied. The Trust's priority for implementation in the near term will be to rehabilitate existing buildings, thereby generating revenue to fund subsequent capital improvements and operating expenses. Building demolition comes with a cost – it requires the capital monies to fund the demolition and also results in reduced revenue while the square footage is taken off line from leasing. The Trust will therefore have to balance and phase proposed demolition and new construction carefully in light of the Plan's financial goals. In some cases historic building rehabilitation may be easier to finance when packaged with new construction. Because new construction would generally occur under a ground lease scenario, it would result in relatively lower annual rents to the Trust than space that is rehabilitated directly by the Trust. This topic is discussed further in response to other comments on new construction.

The maximum amounts of demolition and new construction within the Final Plan are maximums only. Through the course of implementation, the Trust will monitor its progress toward achieving financial self-sufficiency and completing the capital program. Based on this progress, the PTMP's figures for demolition, new construction, and the overall square footage cap may be reduced.

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HR-13. Construction of New Housing

The NPS and several other commentors are concerned that there is the potential for an adverse effect on the NHL through the construction of new housing as allowed by the Draft Plan. They feel that new residential construction in historically sensitive areas will adversely affect the character of the Presidio as a whole. Commentors also are concerned that they cannot fully understand the potential impacts of new housing construction proposed in the Draft Plan since it does not specify sites for new construction. They ask that the Plan be amended to make clear that implementation of the Trust's housing policy will not adversely affect the NHL and the Trust's historic preservation goals. One commentor expresses concern that the non-historic housing proposed for removal in the Draft Plan might never be removed, even after new replacement housing is built and occupied, because of its economic value.

Response HR-13 – In response to comments, the Final Plan provides more detailed information about housing than the Draft Plan. See Chapter Two of the Final Plan. Housing, that replaces units removed to restore open space and natural habitat would in many cases be located within existing buildings; this replacement housing would be created either by dividing large units into smaller units or by converting non-residential space to residential use. New residential construction would be limited, would not be permitted to adversely affect the overall status of the NHL, and would proceed only after additional planning, public input, and environmental analysis. The Final Plan now identifies two areas where non-historic housing may, in the future, be removed and replaced with more compatibly designed housing. These are at the Letterman Complex (where Building 1028 currently exists) and at North Fort Scott, behind Pilots Row. These proposals would be subject to additional planning, analysis, and public input; the PTMP's planning principles and planning guidelines would set the framework for the design of any new construction. See responses to Housing and New Construction comments for more information on new construction and impacts on the NHL, and Responses PI-1, PI-2, and PI-10 for information on future NEPA and NHPA review and public involvement.

Any new construction would likely coincide with the removal of non-historic housing to replace lost revenues from the removed housing. To allow new construction, the Trust must remove existing square footage as an offset so that total building area in the park will not exceed today's 5.96 million square feet. In the instance of Wherry Housing, it may be necessary to build replacement units before offsetting space is demolished, but subsequent removal would be an irrevocable commitment once the replacement units came online.

HR-14. Preservation of NHL Status with Demolition and New Construction

The NPS comments that the Final EIS should include a mitigation stating "that all new construction and demolition will be proposed in a manner that assures the preservation of the integrity of the NHL." The NPS recommends that those projects that cannot meet this standard be modified until the standard can be met, or else removed from further consideration.

Response HR-14 – The Trust concurs with the NPS recommendation, and has integrated this language into a mitigation measure in the Final EIS that was taken from the GMPA. See Mitigation Measure CR-4 in Section 4.2.1. The Trust is committed to the preservation and protection of the NHL, as stated very clearly throughout the Final Plan. Under the NHPA, the Trust is required to seek ways to avoid, reduce, or mitigate the effects on historic properties. The Programmatic Agreement outlines the review and consultation process to achieve this goal, and states that the Trust will ensure that future planning documents conform to the SOI standards, the planning principles, and the planning guidelines. There may be cases in which a proposed action would have an adverse effect on an individual historic structure or a landscape setting; however, the action alone would not necessarily threaten the overall integrity or status of the NHL.

BALANCING RESOURCE GOALS

HR-15. Balancing Preservation and Financial Goals

A number of commentors are concerned that the Trust will place more weight on meeting financial and other goals described in the EIS than on avoiding

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adverse effects on the NHLD. A form letter states: “The Final Plan must not only control costs but also protect park resources far better than the preferred Plan does.” Commentors believe that the amount of development proposed in the Draft Plan is not needed to make the Presidio self-sufficient and would jeopardize the goals of protecting the park’s resources. They request that the EIS and the planning principles be amended to state a firm commitment to the avoidance of adverse impacts on individual historic resources as well as on the NHLD, and that the Trust find ways to attain financial sustainability without compromising its mandate to safeguard the Presidio’s park resources.

Response HR-15 – In response to comments, the Plan has been amended to emphasize resource preservation and public use, and to clarify that financial self-sufficiency is merely a condition or requirement that must be met. The Presidio Trust is committed to the preservation and protection of the integrity of the NHLD. This is stated very clearly in the Final Plan, and discussed in detail in Chapter One of the Final Plan. The Trust does face strict financial performance standards, but the means for achieving these will not sacrifice the NHLD.

Clearly the availability of funding will determine when park resources can be rehabilitated and enhanced. The Final Plan speaks to the need to control costs by reducing overall operating expenses, and states that the Trust will set priorities for projects that are needed to (1) safeguard significant park resources; (2) preserve historic buildings, generate revenue, or reduce costs; and (3) finance preservation of buildings and landscapes, or enhancement and expansion of open spaces. See Chapter Four of the Final Plan.

The Final Plan does not “propose” development; instead, it proposes increased open space and decreased building space. New construction would be allowed, but only to replace building space that is removed, and only within quantitative, qualitative, and procedural constraints articulated in the Final Plan. The EIS alternatives include a range of possible square footages, and various amounts of new construction, allowing a comparison of potential impacts.

HR-16. *Balancing an Increase in Open Space with Preservation Goals*

A number of commentors feel that the Trust should not increase open space to the detriment of individual historic resources or the integrity of the NHLD. Historic preservation groups express concern that the Draft Plan’s goals for increasing open space through the removal of non-historic buildings, and a built environment with 5.6 million square feet achieved through replacement construction of some of the square footage demolished, would result in an adverse effect on the integrity of the NHLD. Specifically, they state “the proposed demolition of buildings to increase open space such as in the Public Health Service Hospital, East Housing and South Hills districts, and restriction of new building development to the Main Post, Fort Scott and Crissy Field is a potential threat to the integrity of the NHLD.” Their concern centers on the Trust’s commitment to increase open space, which is not stipulated by the Trust Act, and the proposal to allow new construction (replacement square footage) in “historically sensitive areas” of the Presidio such as the Main Post.

Commentors are also concerned that there is a bias toward doing something that is not stipulated by the Trust Act (increasing open space) at the cost of violating preservation law (which the Trust is required to follow) by allowing new construction that may impair the NHLD. They state that the emphasis should be on preserving historic resources and preserving open space. Another group of commentors recommends demolishing historic buildings to increase the amount of open space. Lastly, one commentor adds that there should be no expansion of Crissy Marsh and no effort to restore Tennessee Hollow, as these actions would destroy historic resources and values of the Presidio.

Response HR-16 – The Presidio Trust is committed to the preservation and protection of the Presidio’s NHLD status. In addition to protecting the NHLD status, the Trust puts forth other resource preservation and enhancement goals in the PTMP that are consistent with the General Objectives of the GMPA and consistent with sound land use planning for a national park setting. These resource goals include the enhancement of natural resources and an increase in open space, but not at the expense of the NHLD. Chapter One of the Final Plan sets forth the planning principles that will guide the protection and enhancement of the Presidio’s park resources, and the balance of the Plan

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reiterates the Trust's priority on the rehabilitation and reuse of historic buildings at the Presidio. In addition, as stated in Chapter Four, "the Presidio Trust's success will be measured largely by the timely rehabilitation and reuse of the Presidio's historic buildings and landscapes, the quality and quantity of open spaces that are created or enhanced, and the extent to which these accomplishments and the park resources they address are understood and enjoyed by park visitors."

The Final Plan calls for a reduction in built square footage, from 5.96 million to 5.6 million, over time. Within this context (overall decrease in building space), the Final Plan allows for some new construction to occur to encourage the reuse of historic buildings and to achieve other plan objectives. The increase in open space and decrease in building space are linked to the phased removal of Wherry Housing. The maximum amount of new construction within the Crissy Field planning district has been reduced in the Final Plan. Any future proposals for new construction would be required to be consistent with the planning guidelines, which are consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties, and would be subject not only to public review but consultation with historic preservation agencies as stipulated in the Final PA.

The Trust's priority for implementation will be on those near-term capital improvements that generate the revenue to fund subsequent capital improvements and operating expenses. The rehabilitation and leasing of historic structures consistent with the Plan and the SOI standards will be a priority upon adoption of the PTMP. Refer to Chapter Four of the Final Plan. With regard to one commentor's concerns about the proposed enhancements to Crissy Marsh and Tennessee Hollow, these proposals will be subject to additional planning, design, and analysis prior to implementation. As part of that process, an assessment of alternatives and effects on park resources, including cultural resources, will be conducted. Chapter One of the PTMP addresses the need for balancing resource needs and potential conflicts between planning principles that may arise. In any event, final designs for these two projects will not be at the expense of the overall status or integrity of the NHLD. Also see Response HR-12.

HR-17. *Balancing Cultural and Natural Resource Restoration Efforts*

The USFWS recommends that the PTIP evaluate the impacts of restoration-related activities, and impacts of development, on cultural resources in an equitable manner. As an example, the preservation and interpretation of the historic Marine Cemetery at the PSHH would be highly compatible with protection and enhancement of existing natural resources in the same area. Thus, the commentor believes that opportunities for maximizing integrated conservation of natural and cultural resource values should be identified and would be appropriate for comparison of NEPA alternatives.

Response HR-17 – The PTMP and Final EIS are programmatic-level documents, and therefore do not assess site-specific actions, such as interpretation of the Marine Cemetery, although Chapter Three of the Final Plan calls for the cemetery's protection and commemoration while also providing for restoration of native plant habitat in the PSHH district. With regard to the effects of site restoration and vegetation management actions on cultural resources, the Final EIS assumes the implementation of the approved Vegetation Management Plan (VMP) and Environmental Assessment (EA) (except as noted in individual alternatives). The VMP EA included a comprehensive assessment of potential effects on cultural resources, and the Final Plan defines measures for environmental protection specific to protecting contributing elements of the NHLD. As site-specific vegetation restoration plans are developed to implement the VMP and the PTMP, they will be evaluated for their effects on cultural resources, and the Trust will strive to maximize integrated conservation of natural and cultural resources wherever opportunities arise.

ADDITIONAL STUDIES/INFORMATION IN EIS

HR-18. *Additional Studies*

Two commentors assert that the Plan and EIS should include a provision for continuing evaluation of Presidio resources to determine whether they are historic and contributing to the NHLD, as required under Section 110 of the NHPA. Since the NHL update was completed in 1993, additional structures are now 50 years old and should be evaluated. Specifically, the historic building studies should include an updated Cold War inventory, as was

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conducted recently for the Doyle Drive Environmental and Design Study. The commentor also recommends that physical history reports be used to inform future actions involving historic structures.

Response HR-18 – Evaluation of the Cold War history of Presidio buildings has already been completed and need not be re-done. See Response HO-13. In addition, the Programmatic Agreement contains specific language regarding the need for ongoing identification of historic properties, for those not previously listed or determined eligible for listing on the National Register. “Evaluation of buildings or structures which may become 50 years old or may have achieved exceptional significance while this Programmatic Agreement is in effect shall be conducted within the framework of the ‘statewide Historic Buildings and Structures Inventory, Dept. of Defense Installations, State of Ca., Vol.103’ and the ‘National Register of Historic Places Registration Forms for the Presidio of San Francisco National Historic Landmark District (1993)’.” The Programmatic Agreement includes a process for the identification and listing of properties, including archeological properties.

HR-19. Preservation of Contributing, Small-Scale Features

Two commentors recommend that the Trust commit to future planning for the preservation and interpretation of the fortifications and cultural landscape features that contribute to the NHLD. One of the commentors expresses concern that all of the small-scale features of the Presidio, which also contribute to the NHLD, are not mentioned in PTIP and should not be ignored. As an example, the commentors note that no historic streets should be demolished, removed, or buried, although their closure to cars would be acceptable.

Response HR-19 – The Trust recognizes that contributing features of the NHLD include more than just historic structures. Planning Principle 1 in Chapter One of the Final Plan addresses the protection and preservation of the NHLD, including the Presidio’s cultural landscape (which encompasses many of the commentor’s noted small-scale features). In addition, the planning guidelines in Chapter Three describe the NHLD’s character-defining features and are organized by cultural landscape components (consistent with The Secretary of the Interior’s Guidelines for the Treatment of Cultural Landscapes). These features include roads and circulation systems. Future

site-specific designs and planning will study the treatment of these small-scale features in greater detail and will be sensitive to the potential effects on the historic resources. The EIS includes a program-level assessment of potential impacts to the Presidio cultural landscape.

HR-20. List of All Contributing Resources

Two commentors request that additional information about the Presidio’s historic resources be included in the Final Plan and EIS. One of the commentors specifically requests a listing of all historic buildings and structures, including roads, that are listed in the 1993 NHLD National Register form and also asks that the locations of historic buildings be identified.

Response HR-20 – The Final Plan includes a map (Figure 1.1) that illustrates historic buildings and designed landscape areas. In addition, Appendix C of the Final EIS lists the contributing buildings of the NHLD. A complete listing of all features, contributing and non-contributing, may be found in the 1993 National Historic Landmark Update form, located in the Presidio Trust Library.

HR-21. Historic Gun Batteries

Two commentors ask the Trust to address potential impacts on the Presidio’s historic gun batteries. The Council on America’s Military Past states that the Plan does not deal with these features of the Presidio and that they are not all labeled in the Plan. They are concerned about the Trust’s recent management of Battery Stotsenberg-McKinnon, which led to damage to the battery’s historic earthworks and historic fabric. They recommend that the Trust turn over responsibility for management and preservation of the batteries, along with monies necessary for their preservation, to the NPS, because the Trust “thoroughly demonstrated that it is not competent to manage such historic structures.”

Response HR-21 – The Trust acknowledges that damage was incurred at this battery, as documented by the Trust’s Historic Preservation Officer and Museum Specialist. Since the time of the comment letter, the Trust has made repairs to the damaged fabric, instituted hands-on preservation training for

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Operations staff working around the Presidio’s batteries, set up a monitoring program for Battery Stotsenberg-McKinnon and associated artifacts, and is developing an action plan for the Battery’s preservation consistent with the NPS Manual referenced in the comment letter. The Presidio Trust recognizes that the Presidio’s coastal/harbor defense structures are contributing structures to the Presidio’s NHLD and that they display the evolution of harbor and coastal defense technology from the Civil War to World War II. As such, they will be preserved and protected and utilized in interpretive programs to help tell the story of coastal defense in the Bay Area. In addition, some of the structures may be reused for storage to support park operations, as was done under the military, or rehabilitated for new uses in the future, consistent with the Secretary of the Interior’s Standards for the Treatment of Historic Properties. The Trust will utilize the NPS Manual for the Preservation of Coastal Batteries in the management of these structures. A statement has been added to the Final EIS to this effect. At this point in time, the Trust is not considering turning over responsibility of the historic defense batteries located in Area B to the NPS. However, the Trust will coordinate with the NPS on interpretation opportunities for these structures.

ASSESSMENT OF EFFECTS

HR-22. Level of Information and Analysis

Several commentors, including environmental and preservation organizations and the NPS, suggest that the discussion of impacts and alternatives in the Draft EIS related to Area B’s historic resources is problematic. They describe the discussion of impacts and alternatives in the Draft EIS as inadequate because the recommendations are too general and yet, when implemented, could have significant impacts. They assert that in order to adequately assess the level of impacts on the NHLD, the EIS should provide information about densities of each planning district for each alternative, building-specific size and use, and structures proposed for removal, rehabilitation, and/or new construction. The NPS states its concern that the PTIP “has not identified the cultural resources to be removed or affected and the impact of the Plan on the National Historic Landmark District (NHLD) cannot be adequately evaluated. The cumulative effect of boundary erosion or the continued removal of contributing structures could each constitute an unmitigatable adverse effect

on the NHLD.” They request that analysis of specific plans, significant adverse impacts, and specific mitigations for these impacts be provided. They also request that the Trust substantiate the EIS conclusion regarding the NHL integrity under all of the alternatives; since the alternatives do not identify structures to be removed nor the location and details of new construction, it is impossible to evaluate the effects of each alternative.

Response HR-22 – The EIS has been modified in part to address these concerns. The Final EIS and PTMP are programmatic level documents and therefore do not include building-and site-specific treatments. However, the PTMP states a clear commitment by the Trust to protect and preserve the overall integrity and status of the NHLD. In addition, the Final PA acknowledges that PTMP is a programmatic document and sets forth a process for review and consultation of future proposed actions that could affect contributing resources of the NHLD, to ensure the Trust’s compliance with the NHPA. The PA states: “Intended as a policy framework to guide the Trust’s future activities, the [Plan] does not specify treatments for individual buildings or identify specific areas for new construction. Instead, the [Plan] envisions further project-specific and/or district-level planning prior to building demolition or new construction with the potential to adversely affect historic properties.” It is through the course of project-specific planning that additional details such as building demolition, new construction, and design guidelines would be identified and assessed with opportunities for public input and agency consultation. See Figure 4.3 in the Final Plan with regard to Public Involvement in Implementation Decisions. The level of analysis requested by the commentors would be provided through the course of future planning and design work with implementation.

In response to the request to provide additional information for assessing potential effects, the Plan has been modified to include, in Chapter Three for each planning district, the existing total building area, maximum permitted building area, maximum demolition, and maximum new construction in addition to land use preferences. The Plan also includes a set of planning guidelines for each district that would form the basis for future implementation activities. The assessment of cultural resources impacts in the Final EIS has been expanded to include a summary of related actions in each planning district for each alternative.

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The EIS concludes that, with the exception of the Resource Consolidation Alternative (which would demolish the historic PHS complex; see Response HR-26) and the Minimum Management Alternative (which would not demolish buildings), building demolition under the alternatives may result in significant adverse effects on individual resources that contribute to the NHLD; however, the overall status of the NHLD would be protected. The consultation process set forth in the PA, as well as the Trust's commitment to ongoing public review and input on projects, will ensure this protection.

HR-23. Preservation Plan

The California Preservation Foundation suggests that the Trust develop a preservation plan for Area B, with historic significance the overriding guide when demolition is considered. The preservation plan should also include guidelines for new construction to comply with the SOI standards, and be subject to NEPA review with alternatives and mitigations included.

Response HR-23 – The PTMP, a comprehensive programmatic-level plan that will guide the Trust's management of Area B, states the overarching goals and principles for how the Trust will take care of and protect the NHLD. The Presidio Trust recognizes the value and significance of the Presidio as an NHL, and the Trust's important role as steward of this landmark. The Plan's language has been strengthened to make this point very clear. Given the complexities the Trust faces in managing the Presidio in accordance with the Presidio Trust Act, and the need for some flexibility in implementing the PTMP over the next several years, the Trust cannot, at this point in time, provide building-specific treatments for all contributing buildings, nor does it anticipate the need for a preservation plan along the lines suggested. However, PTMP sets forth several key elements that would typically be found within a preservation plan and that will in effect form the basis for the Trust's preservation management program.

- A clear statement about the Trust's commitment to the protection and preservation of the overall integrity and status of the NHLD;
- Planning principles (see Chapter One) that provide for the protection of the NHL, and the possibility of demolition and new construction in a manner that is in keeping with the character and integrity of the NHLD;

- For seven planning districts, planning concepts and planning guidelines, consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties, that will direct future changes within each of the districts;
- Identification of the planning and review processes for future decision-making, in particular for actions that could adversely affect historic properties, and subsequent levels of public involvement; and
- Recognition of the Final PA to fulfill the Trust's responsibilities under Section 106 and Section 110 (f) of the NHPA. See Appendix D of the Final EIS.

With regard to the level of detail the commentor requested be included in a preservation plan (additional new construction guidelines, alternatives and mitigations), the Trust anticipates that this information would be forthcoming as part of future site-specific implementation activities. At that point in time, any design guidelines, alternatives, and environmental analysis deemed necessary would be conducted. Please refer to Chapter Four of the Final Plan for more information about implementation. In addition, the PA stipulates that the Trust shall prepare, each year, a report describing how the Trust is carrying out its responsibilities under the PA. The Trust will make this annual report to the public and interested persons, who may provide comment to the ACHP, SHPO, and Trust.

In conclusion, the Trust is not required to prepare a comprehensive preservation plan per se for the management of Area B historic resources. However, the Trust believes that PTMP forms the framework for the Trust's management of these resources and, when complemented by future plans and activities, will constitute the essence of a preservation plan to ensure the long-term protection and preservation of the NHLD.

HR-24. Comprehensive Assessment of Effects

The NPS requests that the Trust demonstrate its commitment to the preservation of the NHLD through a comprehensive assessment of potential effects that will identify an alternative/development scenario that supports its commitment. The Trust should conclude that the PTIP would have the

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potential for an adverse effect to individual historic structures, the NHLD status, and the cultural landscape. (“It is our professional opinion that the consolidation of new construction in the historic areas of the Letterman hospital, the Main Post and Crissy Field and the demolition of the PSHH would have an adverse effect on the NHLD.”)

Response HR-24 – The Final Plan has been modified to state clearly that the Trust is committed to the protection and preservation of the overall integrity and status of the NHLD. The Trust concurs with the commentor that future action could have adverse effects on individual historic structures and the cultural landscape. However, the Trust concludes that, through conformance with the planning guidelines as well as the planning principles and other stipulations (as outlined in the PA), including subsequent analysis, review, and public input, these actions (individually and collectively) will not impair the integrity of the NHLD.

The Final EIS has been modified to make the assessment of potential impacts on the NHLD and on individual resources clearer. In the Final Plan Alternative, the amount of allowable new construction in the Crissy Field district has been reduced compared to the Draft Plan Alternative, and all new construction would be subject to constraints designed to avoid affecting the NHLD. Demolition of the PSHH complex is contemplated only under the Resource Consolidation Alternative. In the Final Plan Alternative, only the non-historic wings are proposed for demolition (consistent with the 1994 GMPA proposed action). Lastly, the Final PA outlines criteria and processes for the Trust to use in determining effect and pursuing consultation with the ACHP, SHPO, NPS, and other parties, if necessary, for actions that would have a significant adverse effect on cultural resources, individually and cumulatively.

HR-25. Cumulative Effects

The NPS comments that the assessment of cumulative effects on the NHLD must consider the potential loss of the Presidio’s NHLD status in a state and national context.

Response HR-25 – While individual historic resources may be adversely affected over time (and these would be subject to additional analysis and

consultation with the NPS and others), the overall integrity and status of the NHLD will be preserved and protected by adoption of the Final Plan or any other EIS alternatives except the Resource Consolidation Alternative. See Response HR-26. Therefore, the Trust does not agree that a consideration of the potential loss of the NHLD status in a state and national context is warranted. Also see Response HR-24.

HR-26. Effects of Removal of the PSHH

The NPS asserts the EIS improperly states that removal of the PSHH would not affect the integrity of the NHLD, and that this action should be identified as an adverse effect not capable of mitigation.

Response HR-26 – In response to comments, the EIS has been modified to clarify that removal of the PSHH and historic outbuildings that make up the entire complex, as documented in the Resource Consolidation Alternative, would have an adverse effect on those particular historic resources and on the status of the NHLD.

HR-27. Effects of Retaining Buildings 40 and 41

One individual requests that the EIS identify the impacts, which he believes to be significant impacts, on El Presidio from retention of Buildings 40 and 41, both contributing structures to the NHLD. He recommends that the Plan be revised to encourage the archeological excavation, display, and interpretation of El Presidio, which should take precedence over the retention of the World War II barracks on the Main Post.

Response HR-27 – The Final Plan and EIS are programmatic-level documents and do not provide building-specific treatments. Buildings 40 and 41 are contributing structures to the NHLD, and have acquired significance as representative buildings from the World War II era, only a handful of which remain on the Presidio. Specific treatments for these buildings, in relationship to preservation planning for El Presidio, would be addressed in a future, site-specific planning process. Nonetheless, the Final Plan does contain policies in support of archeological resource identification and interpretation Presidio-wide, and particularly at El Presidio. The Trust will prepare an Archeological

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Management Plan for the El Presidio to inform site-specific planning and alternative treatments for both the site and the surrounding buildings.

HR-28. Inconsistency with NPS Management Policies

The NPS requests that the Trust conform to the NPS Management Policies on cultural resource management. Further, the NPS claims that PTIP is inconsistent with NPS Management Policies concerning the adaptation and use of historic structures. The NPS states that federal agencies are required to make every reasonable effort to use existing contributing structures rather than propose new construction. The NPS points out that NPS Management Policies state that if new construction is to be considered, it cannot be an intrusion to significant cultural or natural resources. The NPS suggests that the Plan does not provide enough information on new construction to determine if it will affect either natural or cultural resources.

Response HR-28 – The Trust is not subject to NPS Management Policies. However, the Plan has been modified, and sections clarified, to address these resource management concerns raised by the NPS. As stated in the Response HR-5, the Plan has been strengthened to articulate the Trust’s commitment to the preservation of the Presidio’s NHLD status. The Final Plan also states that the Trust will undertake as little new construction and as little demolition of historic buildings as possible, and will engage the public, as well as historic preservation agencies, for input in the decision-making process.

CONSULTATION

HR-29. Consultation with Ohlone

Several organizations, including the NPS, encourage the Trust to engage in consultation with the Ohlone people as part of the PTMP planning process. One commentor asks why the Trust has not signed a Memorandum of Understanding with the Muwekma Ohlone.

Response HR-29 – The Trust included the local Ohlone and other Native American groups in the scoping of the Draft EIS. As part of scoping, the Conceptual Alternatives Workbook, used to seek input on environmental issues that should be considered and topics that would form the foundation of the Draft Plan and alternatives, was provided to these groups. Of the nine groups that received this material and who were invited to provide comment, none responded. The list of Ohlone groups who were contacted was originally provided to the Trust by the NPS. Furthermore, the Final PA acknowledges that “the Trust has made a good faith effort to locate federally recognized Indian tribes that may attach religious and cultural significance to properties under the administrative jurisdiction of the Trust or with which the Trust could consult under the Native American Graves Protection and Repatriation Act; and the Trust has determined that there are no such federally recognized tribes.” While no memorandum of understanding is legally required, and no representatives of Ohlone or other Native American groups responded to project scoping, the Trust is committed to continued consideration of issues of importance to these groups, and welcomes their ongoing input.