



**National Trust for  
Historic Preservation**  
*Save the past. Enrich the future.*

October 23, 2013

Members of the Board of Directors  
Presidio Trust  
Building 103, Presidio of San Francisco  
San Francisco, CA 94129

VIA eDelivery: [commissary@presidiotrust.gov](mailto:commissary@presidiotrust.gov)

**Re: Proposed Cultural Facility at Mid Crissy Field Site**

Dear Members of the Presidio Trust Board:

On behalf of the National Trust for Historic Preservation, I would like to offer comments regarding the proposed development of a cultural facility at the 93,000-square foot former Commissary (Building 610) at Crissy Field.

**Our Interest**

The National Trust is a private, non-profit corporation that helps people protect, enhance, and enjoy the places that matter to them. Chartered by Congress in 1949, the National Trust protects and defends America's historic resources, furthers the historic preservation policy of the United States, and facilitates public participation in the preservation of our nation's diverse heritage. *See* 16 U.S.C. § 468.

**Background**

Our advocacy efforts at the Presidio go back many years, predating the creation of the Presidio Trust. As a concurring party to the Presidio Trust Programmatic Agreement (PTPA) for the Presidio Trust Implementation Plan, the National Trust is committed to the policy stated therein that:

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

More recently we have been actively involved in planning efforts at the Main Post, and are a concurring party to the Programmatic Agreement for the Main Post Update to the Presidio Trust Management Plan (PTMP).

The National Trust's opposition to the CAMP proposal at the Main Post was based primarily on its inappropriate design and siting at the historic heart of the Presidio, a National Historic Landmark District. At the time, we underscored that the former Commissary, and not the Main Post, was specifically called out in the PTMP as the location for a major public cultural facility.

### **The Current Opportunity**

We are thus pleased that attention has been refocused on the Commissary. The construction of the new approach to the Golden Gate Bridge is resulting in a remarkable transformation of the Presidio. The Commissary is at a pivotal location that presents a unique opportunity to knit the Presidio together in a way that was not previously possible.

Furthermore, in contrast to the situation when CAMP was proposed at the Main Post, the Presidio Trust is well prepared to evaluate development proposals at Crissy Field and to assure that any new development takes best advantage of the opportunity presented while protecting the integrity of the National Historic Landmark District.

The Presidio Trust identified specific goals and criteria for evaluation for a cultural facility in its initial Request for Concept Proposals. Among those goals was that the proposed facility be compatible with the natural and cultural setting along the Crissy Marsh and San Francisco Bay, and that it conform to the Trust's *Mid-Crissy Area Design Guidelines* and LEED requirements.

### **Protecting the National Historic Landmark District**

The National Trust underscores the critical role of the *Secretary of Interior's Standards for Rehabilitation (Standards)* and the *Mid-Crissy Area Design Guidelines (Design Guidelines)* in providing a framework with which to evaluate the proposals to develop a cultural facility at the former Commissary (Building 610) at Crissy Field. A brief summary of the key guidance provided by these documents follows:

➤ *Secretary of Interior's Standards for Rehabilitation*

The *Standards* provide a framework for decision-making about work or changes to a historic property, including designing new additions or making alterations. Like all federal agencies, the Presidio Trust uses the *Standards* in carrying out its historic preservation responsibilities. The entire Presidio National Historic Landmark, including the Commissary site, must be treated in a manner consistent with the *Standards*.

While all ten standards are equally important, some have particular relevance to the redevelopment of Building 610. Standard 9 refers specifically to new

construction, stating that “new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.”

In an online resource for applying the *Standards*, the National Park Service offers additional guidance for “adjacent new construction on a site”:

New construction proposed as part of a rehabilitation project on a site should be compatible with the size, scale, and character of the historic property in order to meet the Standards for Rehabilitation. Most important, the new construction should not significantly alter the historic relationship of the existing building or buildings to their immediate surroundings, destroy historic features, or obscure primary views of the historic property.[#\_ftn1][1]

Finding the right balance between differentiation and compatibility can be a design challenge in any setting, especially one as historically significant as the Presidio. New infill construction should not be so similar to the context so as to be mistaken as historic, nor of such contrasting design as to detract from the setting. Historicist design approaches are particularly problematic: Standard 3 states that “changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.”

One final note regarding the *Standards*: Standard 8 states that “archeological resources will be protected and preserved in place.” A successful proposal should avoid impacting archeological resources.

➤ *Mid-Crissy Area Design Guidelines*

The *Design Guidelines* reinforce the *Standards* while adding greater specificity and precision that reflects the vernacular industrial context at Crissy Field. In developing the *Design Guidelines*, the Presidio Trust solicited public comment and consulted with the signatories and concurring parties to the Presidio Trust Programmatic Agreement (PTPA), the agreement that guides the Trust’s processes for complying with the National Historic Preservation Act.

Appropriately, the *Design Guidelines* specifically reference the *Standards*:

Differentiate new construction and building additions from existing historic buildings, yet maintain compatibility according to guidance from *the Secretary of Interior’s Standards for Rehabilitation*. Design the scale and dimensions of new building elements to respond sensitively to the scale of other Crissy Field structures” (23).

The *Design Guidelines* note that the historic context to which new construction on Crissy Field should respond consists of “open, industrial architecture”:

The historic buildings at Crissy Field (Area B) are characterized by white walls and red roofs, with an openness that allows for strong connections between interior uses and street life (p. 22).

Regarding the Commissary specifically, the *Design Guidelines* do not call for replacement, but rather remodeling:

Remodel non-historic Building 610...Remodeling may include but is not limited to replacing the façade and roof, reconfiguring the structural system, modifying or expanding the existing mezzanine, removing or reorganizing interior walls, modifying the building footprint, constructing modest additions, and adding compatible fenestration (p. 23).

The National Trust strongly encourages the reuse of existing structures, including non-historic ones, as the most environmentally responsible development approach, and the approach most in keeping with the Presidio Trust's commitment to sustainable design practices. We are disappointed that two of the current proposals do not appear to contemplate any reuse of the existing structure.

The *Design Guidelines* also speak specifically to the design of a remodeled Commissary:

Any remodel of Building 610 should aim to create a contemporary structure that is compatible with the historic architecture that characterizes Crissy Field....The objective should be to reference the simple geometric volumes of other Crissy Field structures (p. 23).

Any remodel of the Commissary should be of a scale that protects existing views and does not visually dominate the historic context. The *Design Guidelines* provide specific guidance, including building heights:

Preserve views from the Main Post toward Crissy Field, the Bay and Golden Gate, and from Crissy Field to the National Cemetery and Main Post, by keeping the height of new construction below the bluff profile (elevation 45 feet), which is approximately 35 feet above the existing ground elevation at Building 610 and 603 (p. 23).

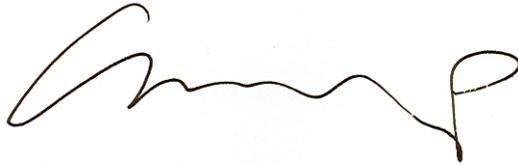
The successful proposal should conform to these height limits.

Finally, the National Historic Preservation Act (NHPA) requires the Presidio Trust to take actions which minimize harm to National Historic Landmark District (NHL) to the "maximum extent possible" 16 U.S.C. 470h-2(f). The National Trust strongly encourages the Presidio Trust to avoid an adverse effect to the NHL. This can best be achieved by selecting a project that clearly conforms to the *Design Guidelines*—one that reuses rather than replaces the

existing structure; that complements rather than competes with the historic context; and that does not block views.

The successful applicant should demonstrate a commitment to the working with the Presidio Trust and stakeholders to finalize a design that respects the historic qualities of the Crissy Field and the Presidio in accordance with the National Historic Preservation Act. Such a commitment will go a long way towards achieving a successful outcome and avoiding pitfalls in the review process that harm the interests of the Presidio Trust, the project applicant, and the public alike.

Sincerely,

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

Anthony Veerkamp  
Field Director