



**PRESIDIO TRUST NEPA AND NHPA (“N²”) REVIEW
MEETING MINUTES
FEBRUARY 28, 2013**

The Presidio Trust’s N² review process allows Project Managers to obtain concurrent review of their projects under both the National Environmental Policy Act and Section 106 of the National Historic Preservation Act. Under N², Project Managers present their projects before a team of resource specialists prior to two determinations: 1) whether the project would be categorically excluded under the Trust’s NEPA regulations or whether it requires additional environmental review; and 2) whether the project would have an adverse effect on historical properties under Section 106 of the NHPA and the Presidio Programmatic Agreement. The following notes include a summary of the projects presented at the meeting dated above, and comments and recommendations for the projects from the results of environmental and historic review.

ATTENDEES

N² REVIEW TEAM

Andrea Andersen, *Assistant General Counsel – Environmental*
Peter Ehrlich, *Forester*
Kari Jones, *Archaeologist*
Michael Lamb, *Historic Landscape Architect*
Chandler McCoy, *Associate Director for Planning & Design*
John Pelka, *Compliance Manager*
Michelle Taylor, *Historic Compliance Coordinator*
Rob Thomson, *Deputy Federal Preservation Officer*

PROJECT MANAGERS

Thomas Knapp, *Project Manager (Construction)*
Michael Boland, *Chief Planning, Project & Programs Officer*
Allison Stone, *Associate Director for Trails & Philanthropic Projects*

OTHERS

Roy Blomquist, *Associate Director of Roads, Grounds & Forestry*
Amy Deck, *Project Manager for Trails & Philanthropy*
Eileen Fanelli, *Environmental Remediation Manager*
Mark Helmbrecht, *Transportation Program Manager*
Bruce Lanyon, *Director of Project Management Services*
Mike McGill, *Permitting Manager*
Dana Polk, *Sr. Advisor for Government & Media Relations*
Steve Potts, *Director of Public Safety & Municipal Services*
Jody Sanford, *Sr. Advisor of Communications & Marketing*
Victoria Peterson, *Assistant Real Estate Manager, CBRE*
Lucia Bogatay, *Presidio Historical Association*

1. 13-019 BUILDING 34 ABATEMENT AND DEMOLITION, MAIN POST

Thomas Knapp, Project Manager (Construction)

Building 34 Graham Street, constructed in 1968, is an unoccupied two-story, concrete and masonry unit building with a full sub-grade basement. The building is approximately 30,000 square feet and measures 211.5 feet by 50 feet. The building’s primary Army-era function was a data processing center and office. It also served as the Trust’s headquarters until 2012. Building 34 is undistinguished due to its low-quality construction, utilitarian character, and inharmonious design with the 19th and early 20th century buildings that comprise the Main Post. The building does not contribute to the Presidio NHL and in September 2012 it was determined individually ineligible for listing on the National Register; the California SHPO has concurred with this determination. Because building 34 does not conform to current seismic structural codes and standards, and is largely incompatible with surrounding earlier buildings, the Trust proposes to abate and demolish the building as contemplated in the Main Post Update. The Contractor will comply with the City of San Francisco’s waste diversion and recycling requirements and its noise ordinance. The site will be backfilled using Trust stockpiled soil or imported soil sampled and tested in accordance with the Presidio Trust soil management plan, and restored in the short term with appropriate low-impact landscaping.

DISCUSSION

Tom Knapp provided a brief overview of the project scope. Demolition and abatement are scheduled to begin April 1st and conclude in July of this year. The abatement and removal of interior equipment and fixtures will occur over a two-month period prior to demolition. Abated material will include an exterior asbestos coating removed through a controlled process onsite; the building’s roof will also be removed and hauled offsite. Tom noted that the project will generate an estimated 300 truckloads of haul material. The demolition process will include onsite crushing of the abated concrete to a Class II aggregate. The aggregate will then be used as fill in the location of the former basement. Eileen Fanelli said the current contract documents that have been issued for bid contain incorrect information on the concentrations of constituents allowed in import fill, and would need to be revised per Genevieve Coyle’s correspondence with Tom. With regard to



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reuse of crushed concrete as backfill, because the source material contains asbestos and lead-based paint, the project needs to document that the crushed concrete also meets the chemical import fill requirements before use. She also questioned the cost benefit to the Trust of abatement and reuse of crushed concrete as backfill. She felt a cost-benefit analysis of disposing the concrete offsite and use of soil as backfill vs. processing the concrete for use as backfill would be helpful. Although technically feasible to abate and process the concrete for reuse, she did not think it necessarily less costly to the Trust, especially if the demolition project is sequenced to allow excess Presidio soils from projects currently being contemplated (East Arm, YMCA Reach, MacArthur Meadow) to be used as the backfill. It was her opinion that use of concrete does not align well with what she perceived as Trust policy/preference to use native soils to the extent possible to restore areas. Andrea Andersen concurred that the reuse strategy recalled the Army’s old practice of disposing of building debris onsite, the removal of which has constituted a large amount of remediation activity during the Trust’s tenure. Tom responded to Steve Potts’ question that the new fill would be compacted to support a new building foundation if warranted in the future, but noted the possibility of fill removal if a new structure included a basement or underground parking. Dana Polk suggested public outreach before April to avoid possible conflicts. Tom agreed and noted that the project schedule includes “no-work” days to accommodate the Komen 3-Day event in June. Peter Ehrlich identified one tree for protection at the south end of the lot adjacent to Owen Street. He said the remaining plantings are too close to the building’s foundation to be retained. Peter also noted the high likelihood of birds nesting in the vegetation during the proposed work period (April-July). Kari Jones previously provided an archaeological management assessment (AMA) for the project. However, given the ground disturbance onsite associated with the building’s construction, she felt there is a low-level of archaeological sensitivity associated with the demolition. Mark Helmbrecht suggested that Tom keep in mind alternate haul routes as an option given other projects that may be occurring simultaneously with the building demolition.

NHPA DETERMINATION

This project was determined to have no adverse effect with the following stipulations:

- The project manager is responsible for following the direction of the AMA prepared for this project. Contact archaeologist Kari Jones, Kjones@presidiotrust.gov or 561-5090.
- The project manager will contact Deputy Federal Preservation Officer Rob Thomson, RThomson@presidiotrust.gov or 561-2758 if there are any changes to the project.
- The project manager is responsible for obtaining all applicable permits. Contact Permitting Manager Mike McGill, MMcGill@presidiotrust.gov or 561-2785.

NEPA DETERMINATION

Based on the N² Project Screening Form, the N² presentation, and the NHPA determination, it was determined that the project meets the criteria for a Categorical Exclusion under NEPA with the following stipulations:

- As the work will occur within the bird nesting season, pruning, brush clearing or plant removal of any kind determined to be unavoidable and necessary during this time will require a survey for nests to be conducted and documented no sooner than 3 days prior to beginning work. If bird nest activity is found in the work area, measures will be implemented in accordance with standard Trust protocols in order to ensure no take of migratory birds or destruction of occupied nests. Contact Presidio Trust Forester Peter Ehrlich, PEhrlich@presidiotrust.gov or 561-4299.
- The project manager will coordinate with the Remediation Department regarding the requirements for import soil to backfill the excavation as well the use of crushed concrete as fill in the excavation to ensure that the site meets unrestricted use requirements. Contact Remediation Program Manager Eileen Fanelli, EFanelli@presidiotrust.gov or 561-4259.

2. 13-020 REZANOV AND CONCEPCIÓN ARGÜELLO STATUE, COURTYARD AT THE CHAPEL OF OUR LADY, MAIN POST

Michael Boland, Chief Planning, Projects & Programs Officer & Allison Stone, Associate Director for Trails & Philanthropic Projects



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The United Humanitarian Mission (UHM), based in San Francisco and established in 1998, is a non-profit organization dedicated to “improving society’s moral health by combating the loss of universal human values.” The UHM has made the Trust an unsolicited offer to commission a bronze statue that memorializes the intended marriage of Concepción Argüello and Nikolai Petrovich Rezanov. The UHM proposal describes the statue as no greater than 9 feet high, 7 feet in length and 5 feet in width, set on a granite base, and located in the courtyard at the Chapel of Our Lady (45 Moraga Avenue). A plaque with interpretative text would be placed at the base in Russian, Spanish, and English. As stated by the project sponsor, the statue would commemorate the “Spanish era of Presidio, and its dealings with other nations, (that is, Russia) who, in their time and in their way, were building Nueva Espana into what would later become California... The compelling story of Concepción Argüello and Nikolai Petrovich Rezanov is a beloved Russian, Spanish, Mexican and American legend. Symbolically, it represents San Francisco’s tradition of multiculturalism... It will celebrate San Francisco’s beginnings as a part of New Spain, as well as emphasizing America’s connection to Russia in this era of diplomatic ‘reset.’” The Trust Board of Directors will make the final decision on whether to accept or reject the statue in accordance with the Trust’s [Art Policy](#) and subject to review procedures set forth in the Trust’s [Art Collection Manual](#).

3. 13-021 BERNAR VENET’S INDETERMINATE LINE SCULPTURE, MAIN POST BLUFF, MAIN POST

Michael Boland, Chief Planning, Projects & Programs Officer & Allison Stone, Associate Director for Trails & Philanthropic Projects

The project sponsor, a private collector, has made an unsolicited offer to donate to the Presidio art collection one of the Indeterminate Line sculptures by Bernar Venet. Venet is a French-born (1941) conceptual artist who has exhibited his works in various locations throughout the world. In the 1980s and 1990s, he created a series of sculptural works titled Indeterminate Lines. These works were created by bending and twisting long square rods of steel with an overhead crane. The sculpture is approximately 30 feet high, 30 feet wide, and 20 feet deep, and weighs approximately 20 tons. The sculpture would be located on or adjacent to the new parkland that will be created by the Presidio Parkway project (tunnel top) at the Main Post Bluff, where it would frame views of the Golden Gate Bridge and Bay, and help draw visitors from Crissy Field up the bluff and into the Main Post. The Trust Board of Directors will make the final decision on whether to accept or reject the statue in accordance with the Trust’s [Art Policy](#) and subject to review procedures set forth in the Trust’s [Art Collection Manual](#).

DISCUSSION

Both art proposals were combined into a single presentation. The following discussion encompasses both projects.

Michael summarized the details of each artwork proposal, and updated attendees on the status of the Art Policy review for the two. As per the Art Policy guidelines, the Trust has completed an Art Panel Review, conducted three public site walks that addressed both proposals, and held a public comment period ending on February 8. In all, the Trust received around 25 comments from members of the public and organizations for both art proposals representing a wide range of opinions on the proposals. Following N² review, the Trust’s Executive Director and Michael will make a recommendation to the Board based on public input, the Art Panel recommendations, and N² feedback. The Board will then make a final decision as to whether each proposal is accepted, rejected, or accepted with modifications. Michael stated that a primary objective of the Trust’s art acquisition policy to date has been an emphasis on “place-based” works that serve to enhance and enrich the visitor experience. Lucia Bogatay of the Presidio Historical Society commented that the Trust should not be accepting new, permanent works of art into the park, and that the Venet proposal and its subject matter did not contribute to efforts to interpret the history of the Presidio.

Rob Thomson said that he evaluated the potential effects of each artwork as proposed under the NHPA and reached some conclusions as to how the projects might be modified in order to avoid adverse effects. His evaluation was based on the Secretary of the Interior’s Standards for the Treatment of Historic Properties and on potential effects to each of the seven aspects of integrity (association, setting, feeling, location, materials, workmanship and design) relative to both specific locations and to the National Historic Landmark District as a whole. The Rezanov/Argüello proposal would introduce a conceptually-defined sculpture into an extant landscape with low integrity but a high level of archaeological sensitivity. Kari Jones identified the archaeology-related issues with the Rezanov/Argüello statue and concluded the proposal has the potential to adversely affect archaeological resources due to its size and presumed need for some sort of footing. She



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noted that the proposed area of installation has not been the subject of previous archaeological investigation, but is within the archaeological site of El Presidio de San Francisco. The proposed art work subject matter and location also appear inconsistent with the Trust's previous planning efforts for the Main Post and the archaeological site of El Presidio de San Francisco as detailed in *Levantar: An Archaeological Management Plan for El Presidio and the Main Post Update*. These documents outline the Trust's long-term effort to archaeologically excavate El Presidio and commemorate its features (including stone foundations) on the surface. Although the subject matter is relevant to the history of the Presidio and some of its early historic figures, the proposal would appear to impede and complicate the Trust's archaeological and interpretive efforts in its proposed location. Rob also said the statue has the potential to undermine the setting and feeling of the Presidio as a whole. There is no evidence of figurative statues or memorials representing specific individuals introduced into the post outside of the cemetery, which itself has only limited examples. This characteristic approach to commemoration persisted despite the fact that several important figures from U.S. military history (such as Pershing and Funston) are associated with the Presidio and have other landscape features or streets named for them. Based on this, it can be ascertained that the nature of commemoration for important historic figures and events at the Presidio has historically been non-representational, making the Rezanov/Argüello statue incompatible with the character of the NHLD.

With regard to the Venet proposal, the sculpture would introduce a specific non-historic element into a yet-to-be designed, non-historic landscape (the Main Post Bluff tunnel top). Like the Rezanov/Argüello statue, there is also no Army-era precedent for the addition of this particular type of landscape element into the post. There is, however, a military tradition of adding non-figurative elements to the landscape in order to enhance vistas, walking paths or open areas (typically ordnance or other military hardware). Given the scale of the new landscape where the Venet is proposed, the primary consideration would be around its visibility from historically significant viewpoints in the Main Post and neighboring Crissy Field. In order to avoid adversely affecting the setting and feeling of the Presidio NHLD, the artwork could ideally be screened or made otherwise visually unobtrusive from the view sheds of historic buildings (primarily 106 and 210), and historic landscapes such as the foot of the Main Parade and Old Parade grounds (i.e., the north edge of Lincoln Boulevard and southward). This objective could be achieved either by locating the proposed work at a distance from these sensitive receptors, or screening the new work from them with new landscaping or topographic features consistent with the intended character of the bluff (level at the top, sloping steeply along the northern edge). Similarly, while the work could be sited to draw attention from users of Crissy Field, it should not constitute a prominent visual feature from the nearby cultural landscapes of the airfield and Mason Street Warehouse area. Chandler pointed out that the height of the Venet sculpture at 30 feet would make screening it particularly challenging. Andrea noted that public art installations had increasingly been part of military posts in recent decades, based on her experience, and that it might be valuable to examine their criteria for accepting or rejecting new art proposals.

NHPA DETERMINATIONS

As proposed, the **Rezanov/Argüello proposal** has the potential to adversely affect the NHLD due to its representational subject matter and its likelihood to disturb sensitive archaeological resources. Adverse effects could be avoided by modifying the proposal as follows:

- Relocate the proposed artwork outside of the El Presidio archaeological site, either to an area of low archaeological sensitivity or inside a building where subgrade disturbance would not be needed.
- Reduce the scale of the proposed sculpture such that a footing would not be needed, and the work could sit “lightly” on the landscape, or perhaps be movable to allow for interpretation of cultural landscape or other historic features.
- Change the format of the proposal to be non-figurative (such as a plaque, abstract landscape element or place name) to remain in keeping with the Army's tradition of commemorating important individuals from its past with non-representational elements or naming.

As proposed, the **Venet proposal** has the potential to adversely affect the NHLD due to its scale and the potential difficulty in screening it from the viewshed of sensitive historic receptors. Adverse effects could be avoided by modifying the proposal as follows:



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- Incorporate general treatment recommendations from the Main Post Planning & Design Guidelines and the Main Post Cultural Landscape Report to improve compatibility of the sculpture and associated site features (paths, plantings, furniture) with the general landscape character of the Main Post.
- Prepare studies or visual simulations of the installation in order to determine the optimal location on the new bluff for screening and/or avoiding the interruption of sensitive historic view sheds.

NEPA DETERMINATION

No NEPA determination will be made on either proposal pending the disposition of NHPA adverse effects and further direction from the Board regarding the acceptance, rejection or modification of the proposal.