



ATTACHMENT

3

NPS AND
SHPO LETTERS

JAMES
CORNER
FIELD
OPERATIONS

NATIONAL PARK SERVICE I



United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94123

IN REPLY REFER TO:
D18 (GOGA PROJ)

June 1, 2015

The Presidio Trust
Attn: John Pelka, New Presidio Parklands Project EA
103 Montgomery St.
P.O. Box 29052
San Francisco, CA 94129-0052

Dear Mr. Middleton:

We wish to acknowledge and support the Presidio Trust in its planning efforts for the New Presidio Parklands, especially the widespread, thoughtful public engagement and outreach and collaborative nature of consultation with the National Park Service (NPS) and Golden Gate National Parks Conservancy. This is an important transformation for the Presidio landscape that will connect the Main Post and Crissy Field, and the alternative concepts presented reflect responsiveness not only to the sensitive surroundings, but also the depth of public comment and input received to date. Park leadership and project staff have appreciated the many avenues provided to express the park's interests in the project and we look forward to continuing the conversations and rich discussions.

We offer the following observations and comments as part of the scoping process for the New Presidio Parklands Project Environmental Assessment (EA), pursuant to the National Environmental Policy Act (NEPA). These comments are in addition to those previously submitted by the National Park Service as part of the National Historic Preservation Act (NHPA) consultation process under the Presidio Trust's Programmatic Agreement.

Visitor Center Plaza

We are pleased with the progress our teams are making with the Presidio Visitor Center design for Building 210. We support the concepts being explored to provide a warm, welcoming landscape that allows for public gatherings, and the provision of basic visitor needs such as restrooms and other amenities. We look forward to continuing to work together on this important indoor/outdoor interface at the Visitor Center.

Crissy Field Center

The NPS is supportive of the concept of expanding the Crissy Field Center and creating an adjacent "learning landscape" designed specifically for youth and families in order to meet our joint Park Youth Collaborative goals of serving more young people, especially those that come from under-represented communities. At the same time, we are eager to discuss the

programmatic roles of each of the partners in this effort and how we will collaboratively contribute to the overall management and implementation of this effort, including future programs.

Impact Topics

We understand that the New Presidio Parklands EA will be tiered from previously approved plans and NEPA documents – namely the Presidio Trust Management Plan, the Main Post Update, and Doyle Drive Replacement project. With that in mind, we believe that the impact topics analyzed in the Main Post Update Final Environmental Impact Statement should be included in this EA. Of those topics, we believe the effects on visual resources, visitation, water resources, and transportation and parking are especially important to examine. In addition, we would suggest that the effects on the dark night sky and on climate change adaptation also be included in the analysis.

Building Removals

We fully support the removal of Building 211 in order to open up the view corridors near the Visitor Center, and we discourage any replacement construction on this same site that could block the views from the north side of the Visitor Center. If new construction is pursued here, the complex of structures in this area should be carefully thought through with regards to visitor experience, wayfinding, form and function to be successful. Any new construction in the National Historic Landmark District needs to be thoughtful and compatible.

Although the former Commissary building is outside of the project area, we believe that its future should be considered with the current planning effort, or as soon as possible. We believe that restoration of the site to a natural condition may be the highest and best use for the site in the long-term. At a minimum, removal of the former Commissary and replacement with a smaller, more compatible, public-serving function should be considered as soon as possible. The Commissary's location makes it undeniably part of the adjacent landscape's transformation and visitor experience, especially as part of the southward viewshed, and its incompatibility will be increasingly evident once the new parklands are built.

Area A/B Connection

As we have discussed, it will be important to achieve welcoming connections-visually as well as physically- between the Main Post and Crissy Field, and Areas A and B. We look forward to continuing the dialogue and finessing the details around this, particularly along Mason Street. We will continue to be involved in the circulation planning for pedestrians, bicyclists, and vehicles along Mason Street and specifically at major nodes or crosswalks on Crissy Field.

One of our concerns is the potential effect on access to Area A lands and parking demand in Area A as a result of the new Presidio Parklands improvements, especially if the new parklands in Area B become a major visitor destination. As previously stated, we have concerns about these types of impacts with the proposed relocation of Sports Basement to the Mason Street warehouses at the east end of Crissy Field. The cumulative analysis section of the EA should address this topic and identify appropriate monitoring and mitigation measures.

151

NATIONAL PARK SERVICE II

Crissy Refresh

As you are aware, the Parks Conservancy and NPS are contemplating a "refresh" to the beloved Crissy Field planning area. Key visitor amenities, such as the Promenade, Crissy Air Field, Mason Street, and vehicular circulation and parking are in need of repair and improvement. The Conservancy and NPS will engage the Presidio Trust directly in the planning process for this project in the near future; however, since this project is on a different schedule than NP3, we recommend you utilize Crissy Field's existing conditions as the baseline for the environmental analysis, with a reference to the future planning in the cumulative impact analysis.

Again, we applaud the Presidio Trust on the engaging, creative, and exciting planning process underway for the New Presidio Parklands and we look forward to the continued collaboration on this important project.

Sincerely,



Chris Lehnertz
General Superintendent

Cc: Greg Moore, GGNPC



United States Department of the Interior
NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason # 201
San Francisco, California 94123

IN REPLY REFER TO:

H4217 (GOGA-CRMM)

Craig Middleton
Executive Director
Presidio Trust
Attn: Rob Thomson
103 Montgomery Street
P.O. Box 29052
San Francisco, CA 9589412916

Dear Mr. Middleton:

This letter serves to provide consolidated comments from the National Park Service, both Golden Gate National Recreation Area and the Pacific West Regional Office, on the Second Consultation Package for the New Presidio Parklands Project under Stipulation IV.C.2 of the Presidio Trust Programmatic Agreement. The Second Consultation Package contains a draft Area of Potential Effect (APE) and a Description of Preliminary Concept Alternatives.

We consider the APE to be very generous, and thus, it would seem consistent to also include the Letterman Planning Area, since substantial portions of the project are adjacent to this planning area. However, we do feel that the APE justification statement that "the potential for the undertaking to affect the NHLD as a whole is negligible" is somewhat of an overstatement, since the undertaking can certainly affect the views from a wide swath of Crissy Field and Main Post and Letterman, especially if highly-visible incompatible elements are introduced.

In Elements Common to All Alternatives, it is not made sufficiently clear that the reason the expansion of the marsh to the east of the Commissary has to be reduced is because this location is outside of the project area.

As we proceed to specific comments on the alternatives, it would aid in our understanding of all alternatives if contour lines were included on the plan views. The addition of sectional drawings would also be very helpful, as would further perspective renderings of important landscape elements. For instance, perspective renderings of certain meadow areas, gardens and overlooks and other activity focus areas would greatly help clarify design intent. Renderings of all alternatives and options as seen looking up from Crissy Field, the Main Post, and Letterman are especially important in order to fully understand the effects of the project on the neighboring historic district.

Alternative 1 has, at least, the virtue of simplicity. The predominance of open sight lines and native plantings are essential elements to build upon for all the following alternatives. However, the retention of Building 211 and the large amounts of new parking are elements that we feel should not be brought forward into further design development.

Alternative 2 has far too much lawn to be acceptable in an era of drought and global warming. The main circulation network seems as if it is forced upon the landscape, while its geometry references neither the rectilinear features historically upon the bluff top, nor the contour lines of the bluff. The location of the additional parking immediately east of the Visitor Center intrudes too much on the park-like setting with which it is more desirable to surround that facility.

Alternative 3/1 (and the remaining "concepts") indicate that Building 211 is removed, which is a crucial element for the appropriate rehabilitation of the area. Concept 1 makes strong use of vegetation native to the coastal bluffs, which is a historically appropriate treatment, and has a minimum of hardscape. Altogether, this concept is compatible with the surrounding historic areas. In this, as in all alternatives, lawn should be minimized, consistent with providing comfortable seating areas on the ground for visitors. All options should consider introducing additional Monterey cypress trees to the bluff-top area, in order to complement the existing mature trees and frame the views north from the Main Parade. More information about the secure area around the Crissy Field Center, in this and the other options, should be provided: the height of the perimeter fencing, and how the fencing would be screened.

Alternative 3/2 creates a false sense of history by the overly-generous extension of rectilinear geometry into the top of the new parklands. However, incorporating a more restrained reference to the rectangular footprints of the stables once in the area is entirely appropriate for this and for the other concepts. The tremendous expanse of lawn should be minimized in favor of meadow grasses, assuming that a meadow needs less water than a lawn and can still be used for seating. The horticultural gardens below the bluff may well be compatible to the broader native landscape of the bluffs, but should specialize in flora of the area, both to be compatible with the historic landscape and to better contribute to the educational component of the program. The ratio of hardscape to vegetation is high in this option, and the amphitheaters are an addition to the landscape with no historic precedent and thus need careful attention. Perhaps a softer design, using stepped-down grassy areas could be explored as an alternative to hardscape amphitheaters. The additional buildings on the bluff top should be oriented to reflect the historical location of the stables, and perhaps minimized or combined.

Adjacent to the Crissy Field Center, the location of the additional buildings should be set back from the line of Mason Street and not placed the center of the sight line looking down from Main Post. Having the bathrooms nearly align with the main axis of the parade ground seems especially contrary to good design. There should be a good justification for introducing these two information buildings in the area. Can they not be combined to reduce overall footprint? And when designing the learning landscape, we recommend keeping flexibility in mind, since interpretive themes change over time. Too much investment in hardscape features specific to only one theme may well become obsolete over time.

Alternative 3/3 would be improved, in our opinion, by including less lawn and more native plantings or meadow. The new semi-underground structure may be compelling programmatically, but remains somewhat problematic in terms of compatibility with the National Historic Landmark. Issues that need to be addressed in this regard include having it well hidden in the landscape (and the broader viewshed below) while still affording expansive views, the nature of the roof covering, and, not least, provision of an acceptable interim treatment for the site. Since it remains unclear when, or if, funding would become available to build this structure, this last consideration becomes crucial for realistic and successful implementation.

Sectional views through the proposed semi-underground structure are crucial in order to better understand how visible it will be, as well as a rendering of the structure as seen from Mason Street below. The concept of green roofs and green walls is compelling; however, they take sustained effort to succeed and if they do not, we could end up with an eyesore. It is, after all, more lawn that requires water. That said, there are successful public examples, such as the one at Lincoln Center in New York City, although the urban context there is different than the more park-like Presidio.

Similar concerns about visibility exist regarding the overlooks, which should be designed more as extensions of the bluff topography than cantilevered examples of structural engineering. While we recognize the need for appropriate small-scale features to provide a rich array of programmatic use by visitors, we question if five amphitheaters are really necessary, and reiterate the previous suggestion to explore softer landscape design that could achieve the same programmatic aim. Similarly, fire pits may seem to provide a traditional national park experience, but are perhaps more appropriate in the less formally-designed and less urban area of the post.

There remains the substantial concern about the cumulative effect of this project, given the amount of change planned for the area north of the Presidio Parkway. The Mason Street Warehouse rehabilitation, refreshing Crissy Field, the uncertain future of the Commissary, and possible retention of the temporary Crissy Field Center all need to be considered. Exactly how all of these efforts are to be coordinated, and how cumulative effects are to be addressed—both for the New Presidio Parklands and during compliance for each of those other undertakings—is a major challenge.

All this said, there is much to like in the proposals, and we applaud the Trust for its robust efforts to ensure widespread public involvement, and for the collaborative nature of the consultation with the National Park Service and the Golden Gate National Parks Conservancy. We look forward to continuing to make the New Presidio Parklands a great success and a model of historic preservation in national parks.

Sincerely,

Christine Lehnertz
General Superintendent

cc: Elaine Jackson-Retondo, Ph.D.
National Historic Landmark Program Coordinator
National Park Service, Pacific West Region
333 Bush Street, Suite 500
San Francisco, CA 94104

Carol Roland-Nawi, Ph.D.
State Historic Preservation Officer
Office of Historic Preservation
Attn: Mr. Mark Beason
1725 23rd St #100
Sacramento, CA 95816

STATE HISTORIC PRESERVATION OFFICER

From: Beason, Mark
Sent: Monday, May 04, 2015 3:51 PM
To: Thomson, Robert
Cc: 'Elaine Jackson-Retondo; [Stephen Haller](#)
Subject: New Presidio Parklands Project - SHPO ref. # TPT_2014_0904_001

Hi Rob,

After reviewing the information submitted along with the Trust's March 20, 2015 letter, the SHPO offers the following comments.

- The APE appears to be sufficient to take both direct and indirect effects into account.
- In the next set of consultation information, or whenever it is convenient, could you please provide a list of the non-contributors within the APE, or at least within the footprint of the NP3?
- As mentioned in the document entitled "Elements Common to All Alternatives," the Presidio Promenade and De Anza Promenade appear to be named features that will be incorporated into the design, but neither is indicated on the diagrams illustrating the alternatives. Please clarify where these elements will be.
- As a point of curiosity following one of the comments by the public, what is the existing policy regarding outdoor art installations and play structure installations?

We look forward to continuing consultation on this undertaking.

Mark

Mark A. Beason
State Historian II
Architectural Review and Environmental Compliance
California Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816