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, vialation, 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 an indispensable part of the adjacent landscape’s transformation and visitor experience, especially as a 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 refining 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 warehouse 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.
Crissy Refesh
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 NPS, 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 Lehmenz
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 NHRPD as a whole is negligible” is somewhat of an oversatement, 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 hardcape.

3/2, 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 rectilinear 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 hardcape 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 hardcape 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 at 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 hardcape 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 viewed below) while still allowing 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 overviews, 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 substantive 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 rehabilitations, 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 Lehnuertz
General Superintendent

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

Carol Roland-Nawel, Ph.D.
State Historic Preservation Officer
Office of Historic Preservation
Attn: Mr. Mark Benzen
1725 23rd St #100
Sacramento, CA 95816
From: Beason, Mark  
Sent: Monday, May 04, 2015 3:51 PM  
To: Thomson, Robert  
Cc: Elaine Jackson-Remondio, 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

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United States Department of the Interior  
NATIONAL PARK SERVICE  
Golden Gate National Recreation Area  
P.O. Box 302, San Francisco, California 94129-0003

Dear Mr. Pelka:

The National Park Service, Golden Gate National Recreation Area (GGNRA) is pleased to have received and reviewed the New Presidio Parklands Environmental Assessment (EA). Our collaboration with you from the early formative stages of the project makes it easy for us to feel a sense of pride and great anticipation in the parklands project as you complete the required environmental compliance. We are eager to work with you and the Golden Gate National Parks Conservancy in the future design stages of the proposed preferred alternative—Alternative 3—and we offer these comments in that spirit.

The following observations and comments are submitted pursuant to the National Environmental Policy Act (NEPA). GGNRA agrees with the Draft Finding of No Significant Impact (FONSI) with regards to NEPA procedures, as presented in the EA. There are several areas in the document where we believe additional analysis, investigation, and monitoring in regards to visitor use, transportation, and natural resources would ensure a more successful project. Furthermore, additional explanation would help the public understand the anticipated project outcomes. The enclosed comments outline these observations:

We have every confidence that our comments will be resolved in the final FONSI, the present schematic design phase, and through continued collaborative management of the Crissy Field corridor.

Please note that additional comments may be submitted by the National Park Service as part of the National Historic Preservation Act consultation process, under the Presidio Trust’s Programmatic Agreement.

We once again applaud the Presidio Trust on the exemplary planning process underway for the New Presidio Parklands and we look forward to continued collaboration on this important project.

Christine Lehnerz  
General Superintendent

cc: Greg Moore  
Encl: (1) NPS/GGNRA Comments on New Presidio Parklands EA
Water Resources

pg. 39: The statement that “the Trust will implement designs to reduce or eliminate impervious surfaces” appears to conflict with the preferred alternative which adds 5.6 acres of impervious surface relative to the no-action alternative of 1.9 acres. We encourage the Trust to seek additional opportunities to reduce impervious surfaces in schematic design. NPS encourage use of drought tolerant plants in landscaped areas and implementation of irrigation practices that minimize water use. We also encourage careful monitoring of application and operations to minimize the risk of incidental runoff.

Visual Resources

pg. 33: Protection of visual resources on this highly visible site to closely associated with Crissy Field is of special interest to GGNSRA. The EA addresses visual resources in several places, but not consistently under a “visual resource” heading. For example, mitigation for fugitive light is under “biological resources”, and the utilities section doesn’t refer to the potential negative visual impacts of service poles or other equipment. And the visual resources section on pg. 33 only addresses revegetation. The section on Alternative 3 cultural resources (pp. 73-77) could have been strengthened by clear commitment that features in the landscape (overlooks, paths, amphitheater, etc.) would not obstruct views, but be visually subordinate to the larger landscape.

pg. 70: Two additional historic buildings (220, the former Garrison Headquarters and 218, the Fire Station) should be considered part of the Area of Potential Effect as the new parklands are immediately adjacent to these structures and changes in the landscape (parking, new structures, etc.) may impact the setting and viewscape of these buildings.

We encourage the Trust to plan for preserving visual quality historically in the schematic design phase. This interest in preserving the historic setting is also an NHLA Section 106 subject further elaborated upon in a separate letter from the NPS.

Transportation

pg. 36, 37: In several places the EA either encourages the NPS or assumes that NPS will implement additional regulations, including paid parking, on Crissy Field in areas such as East Beach, to manage parking demand. At this time, the NPS has no plans to implement paid parking on Crissy Field beyond what is in place currently, and the EA should analyze the transportation and parking impacts assuming there is no paid parking in place.

Signalization of intersections at Level of Service (LOS) E and F: While the goal of deferring signalization until after additional Transportation Demand Management (TDM) measures have been tried is admirable, there should be a specific monitoring and adaptive management plan in place and a commitment for implementation (when certain thresholds are reached, for example). The NPS has concerns that TDM measures will suffice to improve the LOS for these intersections and that it would be prudent to be prepared for implementation of signals to manage the traffic.

pg. 46: It is unclear why Mason Street/Marine Drive intersection is excluded from the analysis, as well as Crissy Field Avenue and McDowell Avenue (north end), since they will both be affected from changes in traffic flows to the Crissy Field.

NPS agrees with expanding PresidioGo, particularly during weekends. Specifically, we encourage increasing frequency to Crissy Field from the Transit Center. With the extension of MUNI 43 to the Transit Center, the use of transit to access Crissy Field could be significantly increased; however, expanded PresidioGo is an important component in making that occur.

pg. 49, 2nd paragraph, All Alternatives: It would have been helpful to state the assumptions underlying building uses along Mason Street. It is unclear whether the uses are from the FTMP analysis or another land use plan (i.e. Sports Basement EA). Currently some of these buildings are not occupied, so it would be helpful to clarify what assumptions are made regarding their occupancy.

Likewise, the assumptions around trip generation for open space should be clarified. It seems that the quality and anticipated use of open space under each alternative will be different than the current Crissy Field open space use, given the variety of proposed amenities within the new Presidio Parklands. So a one-for-one calculator may not be directly applicable. The open space trip generation estimating formula could be clarified.

Level of Service Planning Period: The NPS appreciates analyzing multiple peak periods for level of service (weekday, weekend, peak weekend); however, it is not clear what period is used as a performance standard. It appears that mitigation (signal(s)) is being applied during all periods, which suggests that the goal is to have an acceptable LOS during peak hours during peak weekends. Because of its location and the influence of San Francisco commute traffic, we suggest that a more appropriate planning period for the Presidio would be the weekday peak.

pg. 57, Parking: The 1st paragraph states that “Parking utilization will increase with increased occupancy of buildings in these districts”, and Table 7 gives the data for supply and current utilization. But current utilization is not for fully projected building occupancy. It is unclear how full occupancy is analyzed as part of the alternatives.

pg. 59, All Alternatives: The statement that “increasing parking supply in key areas to meet demand would minimize the negative effects of motorists circulating in search of available parking” does not seem consistent with Alternative 3 which proposes the least amount (amongst alternatives) of parking on the project site to meet demand. It is not clear how this objective would be achieved.
Natural Resources

pg. 28 and pg. 130, Marsh Expansion: We are concerned that the 2004 PWA Study is used as a rationale for excluding marsh expansion anywhere except the area immediately around the flood shoal (near the east end of the marsh). Although there may be other considerations which conflict with marsh expansion within the New Presidio Parklands project area, the 2004 PWA report should not be used as a rationale for rejecting marsh expansion in this area. While the PWA report recommends that “future expansions to the existing marsh should include enlarging the area near the flood shoal,” it is not meant to suggest that expansion in other areas is not recommended. Projects that expand the existing marsh have the potential to add significant ecological benefits to the marsh.

pg. 38, Biological Resources: We recommend the Trust describe additional measures to prevent the spread of pathogens and invasive plants during construction (e.g., clearing and disinfection of tools, vehicles, boots, etc.).

pg. 56, Coastal Salt Marsh: Note that leopard shark have only been seen in the marsh on a few, rare occasions. Topemelt (Atherinops affinis) and Pacific staghorn sculpin are also common fish in the marsh. The marsh also supports a variety of crustaceans and benthic invertebrates.

Project Site

pg. 4, second bullet, Crissy Field Center and Youth Campus: We suggest that the description for these uses could be more clearly stated to align with the goal stated on pg. 38 which reads “Teaching these goals requires new educational facilities and outdoor learning environments that fill the entire project site.” It seems that if these are specific goals the project is trying to achieve, they should be included in the goals on pg. 4. Furthermore, the goal to expand these facilities to increase program participation is used as a factor for not further studying an expanded marsh. If educational program expansion is a screening factor for alternatives, then it should be analyzed as all of the alternatives. In the same paragraph for this bullet, the use of Building 603 should be identified as the existing Crissy Field Center. The “adjacent construction” is proposed new construction.

Consistency with Land Use Plans and Policies

pg. 41: Although smaller in scope than the other plans listed in this section, the Sports Basement EAA could have been included. It is an upcoming project which relates to physical environmental issues of the New Presidio Parklands proposal. Likewise, the Transportation Impact Analysis section could include the Sports Basement EAA in the Intersection Analysis section on pg. 44.

Visitation

NPS has several concerns about the descriptions of how the new parklands will change and affect the existing visitation pattern. This topic is first mentioned on pg. 59 related to special events; with later references on pg. 59 to impacts on transportation, and most thoroughly beginning pg. 61. Impacts associated with a growing youth program could be clearer. And the discussion (pg. 26) about a proposed increase in retail, food service, and restrooms is not detailed (size and location). It would be helpful to clarify if these services are anticipated to be accommodated in the New Observation Post or elsewhere.

pg. 59: Events are proposed to be capped at 1200 persons to ensure that supply meets demand, but it is unclear how the number of persons affects or translates to parking supply given that event participants may arrive at the site by many different modes of transportation. Also, it is unclear if 1200 is the cap per individual event or the cap for multiple events totaled together for one day.

pg. 61: NPS is unaware of analyses that conclude that Crissy Field has more visitors than originally designed to accommodate. Parts of Crissy Field (such as the airfield) are not as heavily visited as other areas, such as the Promenade, but they are very popular. It also seems that the recent increase in visitors, and access issues on the weekend, may be partly attributed to the new building uses and programs inside the Area B buildings.

pg. 63: Visitation Demand at Crissy Field, 1st sentence: Additional information is needed to explain the statement about Crissy Field visitors re-routing into the new Parklands. When you consider the proposed new programming and features, it is uncertain whether more visitors from Crissy Field would reroute through the Parklands than visitors to the Parklands would discover Crissy Field. Monitoring may be required to understand this dynamic.

pg. 67: Alternative 3, 1st sentence: It’s unclear how Alternative 3 would deliver “greater participation by the local and regional population” than the other alternatives. A greater variety of experiences does not necessarily translate into greater participation by locals unless there is targeted outreach, commitment to easy access, etc.

In general, we encourage the Trust to commit to a thorough program of monitoring visitor use at the New Parklands. This could be particularly effective in the early stages when patterns are emerging and management actions may be more easily implemented. Such a program could be integrated with NPS and Parks Conservancy analysis of visitation along the Crissy Field corridor, and development of an adaptive management program.

Crissy Refresh – Cumulative Impacts

pg. 115-116 and in other places: GGNNRA and the Parks Conservancy continue to analyze what a “refresh” of the Crissy Field corridor would entail, and have not established a timeline for such a plan. References to the Refresh made in the EA about reuse options for Building 1199 do not reflect the full range of options GGNNRA may consider in the future, nor do other descriptions of how the site performs represent the park’s analysis. We look forward to collaborating with the Presidio Trust on a plan that would refine the vision for the corridor in light of the New Parklands and other issues that have emerged.
Element 8: Conditionally resolved, awaiting design revision. The areas adjacent to the Visitor Center (VC) should be further simplified and adopt a more rectilinear pattern to better integrate into the adjacent Main Parade Ground. In other words, expand the more rectilinear zone further into the project area around the VC in a more substantial engagement with the Main Parade Ground grid. The Western Hollow will be quite visible from the northernmost room in the Visitor Center (which is largely glass), as well as from the length of the Parade Ground, which gains elevation on the southern end.

Element 9: Resolved.

Element 10: Conditionally resolved. NPS would like to have seen the rehabilitation of Building 201 as part of this consultation since the programmed function was part of the undertaking previously and the building is within the project boundary; however, we are willing to accept as separate consultation if referenced in the Tunnel Top agreement (if there is one) and if the State Historic Preservation Officer and Advisory Council for Historic Preservation agree that this would not constitute a piecemeal approach to the undertaking.

Element 11: Resolved. Reducing the height of the retaining wall by two feet, as described in the sketches submitted to NPS, has reduced the visual impact of the feature to an acceptable level.

Element 12 & 13: Resolved.

Element 14: Conditionally resolved, awaiting design revision. While the distinct lozenge remains in the scheme, modifications requested in Element 8 (above) combined with the plantings that line and screen most paths, the visual impact of this characteristic may be reduced to an acceptable level. This relatively small, partially visible, topographically varied transitional site between the main parade ground and Crissy Field can support a more curvilinear form that is perhaps more naturalistic than the exaggerated geometry currently proposed.

Elements 15-17: Resolved.

Element 18: Conditionally resolved, awaiting design revision from the proponent or the Trust. A set of earlier concepts for the Crissy Field campus (June 3, 2015 meeting package), left the area where Building 602 is currently proposed open. The four schemes included:

- Scheme one — rectangle building placed at an approximately sixty degree angle to Building 603 and partially engaged in the slope of the bluff and the east side of the courtyard was nearly completely open with a short L-shaped retaining wall marking the southeast corner of the courtyard and a covered (no walls) area for outdoor classrooms along the east side of the courtyard.
• Scheme two – similar to the first scheme except that the new building would have a wedge shaped footprint.
• Scheme three – similar to first scheme except the new building is L-shaped and the L-shaped retaining wall is omitted.
• Scheme four – similar to the third scheme, however the L is flipped and the L-shaped retaining wall is reintroduced.

While these proposals needed additional work to make the architectural character of the proposed new building more compatible, one thing that all four schemes had in common was leaving the east side of the courtyard open, which allowed Building 603 to remain in the forefront and did not impact Building 603 to the same degree as the current proposal. Additionally, the “Baseline Concept” for the campus included in the package shows two new buildings that are parallel to Building 603.

Explore rotating building 602 so that it forms the south side of the courtyard, which opens up the east side, or revisit the “Baseline” concept proposed in the June 3, 2015 meeting package. The first approach retains a courtyard and reduces wind, and both approaches reduce the impact to Building 603 and to the archaeological site (AR-30). This possibly could be done without totally rethinking programming.

Elements 19 & 20: Resolved.

Element 21: Red roofs and a more opaque white paint will resolve.

Element 22: Awaiting redesign, but likely to resolve.

Element 23: Resolved with removal of the “totem” feature from both building and landscape.

Element 24: Conditionally resolved, awaiting design revision. One of the remaining character defining features of the area on the south side of Mason Street is the relatively flat openness north of the bluff and out toward Crissy Field and Crissy Marsh. The Mid-Crissy Field Design Guidelines state the following:

- Enhance Mason Street’s open streetscape and improve views by maintaining a built setback of at least 70 feet from the south edge of Mason (p. 27)
- Develop a landscape design and approach for the Mid-Crissy area that is compatible with the historic, simple, “open”, utilitarian character of the area, and consistent with the Vegetation Management Plan designation of the area as “designed landscape zone.” (p. 27)

The newly proposed cap for the Land Use Control elevates the finished grade on the south side of Mason Street three feet higher than the finished grade of the roadway, which diminishes the openness to some degree; however, the cap also protects AR-30, a contributor to the National Historic Landmark District. The diminished openness of Mason Street adjacent to the Learning Landscape is exacerbated by the proposed additional earthen berm on top of the cap, which raises the adjacent finished grade another twelve to eighteen inches, for a height of four to four and one half feet plus the proposed tall grasses and trees.

We suggest reducing the berm as much as possible and exploring reducing the height, or density, of the grasses on top of the berm or some other approach so that the edge does not read as a vegetated wall. The other undulations and forms will not likely read as faux geomorphic in reality as they do in plan.

The nature of structures in the Learning Landscape, amplified by the inadequacy of the Supplemental Design Guidelines in setting useful parameters for their insertion into the busy and highly visible Mason Street corridor also has the distinct potential for adverse effect to the feeling, setting, design, and materiality of the historic district. If the vague representations of play structures shown on Simulation 2 are to be taken literally, they are enormous - two or three times the size of the people walking by - and do not appear “subordinate to existing historic resources” as stated on page 61. The assurance that all new features would be subordinate to Building 603 simply does not allow for too many large features to be inserted into the area.

Elements 25 & 26: Conditionally resolved. NPS feels that the proposed 30-day review of 50% Construction Documents is very late in the design process. NPS proposes engaging with designers earlier, in Design Development, and again at a later review.

Element 27: The cumulative effect analysis needs more depth. For instance, there is no acknowledgement that the rehabilitation of the Mason Street Warehouses (Buildings 1182-1188) is an adverse effect; no consideration is given to the effect of removing the Commissary building entirely; no consideration on the effect of the Presidio Parkway project on the former Post Headquarters (Building 220); and the redesign of Halleck Street and associated move of historic Building 201 was not taken into account.

Element 28: NPS supports this possible outcome.

Next Steps

We look forward to a follow up meeting as is stipulated at IV.C.2.d.(1),(c) of the Presidio Trust Programmatic Agreement to discuss our comments and reach consensus on a finding of no adverse effect with conditions. Key to reaching consensus will be the provision of additional opportunities to review the project to understand how areas of concern outlined in this letter have been addressed.

Kristin Baron, Cultural Resources Division, GGNRA, NPS
January 14, 2016

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<td>p.2</td>
<td>Rob’s 10/28/15 letter to the SHPO calls the project a “14-acre project” but the Introduction refers to the Trust as “developing 13 acres of new parkland”. Please adjust discrepancy.</td>
<td></td>
</tr>
<tr>
<td>p.3</td>
<td>Move the caption for Figure 2 to the lower left-hand side of the image so the design is consistent with the other figure pages.</td>
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<tr>
<td>p.4</td>
<td>Para 1: “in anticipation of new construction associated with the expansion of Building 603 to support the CFC”. As you are not proposing to directly construct additions to the footprint of bldg. 603, perhaps change the text to “expansion of programs associated with Building 603”</td>
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<tr>
<td>p.4</td>
<td>Provide photo date for this image and if room allows, a caption that provides viewer with information about the direction of view.</td>
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<tr>
<td>p.6</td>
<td>In Figure 3, Bldg 201 is missing a number label</td>
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<tr>
<td>p.8</td>
<td>This photo needs a date and if room allows, a caption that provides viewer with information about the direction of view.</td>
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</tbody>
</table>
| 10   | Para 2:   | "The onset of World War I cut the PPIE short" is inaccurate. The PPIE continued its full operational schedule and closed, as planned, in December 1915. Change the sentence to "After the closure of the PPIE, the city removed the majority of the temporary buildings and the army constructed a large cantonment of…….."
|      | Para 3:   | "due to treacherous flying conditions resulting from the construction of the Golden Gate Bridge and advances...."
|      | Para 4:   | "largely consisted of military motor pool, storage and warehouse buildings...."
| 11   | Figure 9: | Please provide date - circa 1916- to this photo.
| 21-29| Sub-District Design Guidelines; there are numerous instances where the SDG are discretionary and not prescriptive about the treatments of key character-defining features. In order to make it clear that the guidelines are mandatory, please replace "should" with "will" in the following places:
  - Mid-Crissy Sub District
    - p. 21: "new construction associated with Bldg 603 will favor permeable and open façade"
    - p. 23: “new deck, ramp or access features will not obscure historic relationship ..”
  - Main Post Sub District
    - P 27: “New construction must be sited to the north of existing buildings…”
  - "New construction must be set back from the bluff edge to avoid…"
| 29   | “New construction must use materials from the following list: |
|      | P 23 3rd column, 2nd bullet: “Design new construction that is temporary in nature or can be easily repaired or replaced in the event of damage due to flooding” Please elaborate or spell out more clearly how new construction will be “temporary in nature” while also being architecturally compatible within Crissy Field.
|      | P 24 3rd column, 2nd bullet: “Green roofs are permitted…. Please clarify this text as we are assuming that by “green”, you mean “living”. Please make distinction so that it is clear that you are not suggesting green asphalt tab roof tiles on Crissy Field.
|      | P 24 3rd column, last bullet: On pg 23 the design guidelines suggest to consider the appearance of bldg roofs from Main Post Bluff to hide mechanical systems and other unattractive features located on rooftops. Pg 24 says that photovoltaic arrays may be incorporated into the new construction associated with Bldg 603. Wouldn’t the photo panels on the new bldgs adjacent to 603 be visible from the Main Post bluffs? Please address this discrepancy.
|      | P 27 Average height discussion: Consider adding language that offers an estimation or possible cap on the number of “minor building elements” so that we can all expect only a reasonable number of these taller elements.
|      | P 28 Bullet 2 “Breaking new buildings into smaller volumes in order to disperse their mass…” needs clarification or better wording. This guideline could be misconstrued as the permission to build more, smaller buildings which would risk “littering” this sub district.
|      | P 29 “Green roof” language; please see comment on p. 24.
|      | P 30 Provide photo date for Figure 25 & 26. In Figure 26 caption, please add, “The Transit center, constructed in 2004, is an example…..” |
| P 31 | Avoid vernacular speak. “True historic compliance staff determined that a full blown or unabbreviated HSR was not warranted…” |
| P 32 | Para 2: Editing inaccurate sentences: “The army removed many of the site’s utilitarian structures in preparation for the City of San Francisco’s 1915 Panama-Pacific International Exposition. After the PPIE’s closure in December 1915, with the onset of World War I, the army quickly replaced the dilapidated temporary city…” |
| P 32 | Para 2: “The landscape was further altered in 1936, with the completion of Doyle Drive…” |
| P 33 | Para 3: “The site changed again with a flurry of construction in the run up to World War II as the army constructed several buildings as part of the mobilization effort before WWII. By April 1945, the Mid-Crissy area consisted of…” |
| P 33 | Para 1: minimal Spanish Colonial Revival Mission Revival features. Please see the NPS July 2015 comments from the Blg 99 HSR: There needs to be a consistent agreement and use of the two architectural styles “Mission Revival” and “Spanish Colonial Revival.” At GGNRA, we identify the early, pre-1930s army stucco buildings (San Francisco Port of Embarkation, circa 1912; Fort Winfield Scott, circa 1917 & the earliest buildings constructed in relation to the development of Crissy Field, circa 1928, as Mission Revival. They are the very simple, unadorned white stucco buildings with red roof tiles where the only decorative element is the shadow play between the deep and arched fenestration pattern. During the 1930s, especially at the Presidio, this style became more “polished,” with more adorned, thickly-plastered and almost Baroque Spanish Colonial Revival…” |
February 18, 2016

Rob Thomson
Acting Federal Preservation Officer
The Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052


Dear Mr. Thomson:

This letter conveys the State Historic Preservation Officer’s (SHPO’s) comments on the Preliminary Finding of Effect and Supplemental Design Guidelines for the New Presidio Parklands Project at the Presidio of San Francisco.

The Presidio Trust finds that the proposed New Presidio Parklands Project will not adversely affect the National Historic Landmark District or any of the individual resources directly or indirectly, and that it will not cause cumulative adverse effects.

Undertaking components:

- Demolish non-contributing Building 211;
- Construct a new building of equal size (~9,300 square feet) near the location of 211;
- Rehabilitate and expand contributing Building 603;
- Construct two new classroom buildings totaling less than 7,500 square feet and no single building exceeding 5,800 square feet;
- Add new landscape elements, including
  - Zocalo
  - Anza Esplanade
  - Learning Landscape
  - Bluff Walk
  - Other circulation features

Please note that the SHPO agrees with the comments offered by the National Park Service (NPS) in a January 19, 2016, letter. Specifically, the SHPO cannot concur with the proposed finding of No Adverse Effect and that the undertaking will not cause cumulative adverse effects at this time. This letter will avoid duplication of the points made by NPS, but some may bear repeating. Comments on the Preliminary Finding of Effect follow in Attachment 1, and comments on the Supplementary Design Guidelines are in Attachment 2.

I look forward to continuing consultation regarding this important project at the Presidio of San Francisco. If you have any questions regarding these comments, please contact Mark Beason, State Historian, at (916) 445-7047 or mark.beason@parks.ca.gov.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

Electronic CC:

John M. Fowler
Executive Director
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington DC 20001-2637

Christine S. Lehnertz
General Superintendent
Golden Gate National Recreation Area
Fort Mason # 201
San Francisco, CA 94123

Elaine Jackson-Retondo, Ph.D.
National Historic Landmark Program Coordinator
National Park Service
333 Bush Street, Suite 500
San Francisco, CA 94104-2828
The Terraced Amphitheater seems out of scale and obvious as a new element that does not appear to be directly affected. It should be considered equally with the built environment and archaeological resources as an important part of the NHLD.

It is not clear what historic connections exist between the upper and lower post along Halleck and Bank Streets, and how they are they being “protected.” The term “historic connections” is unclear. Clarify if it refers to those specific roads and their contributing status.

The Learning Landscape, Field Station, and Classroom buildings need further articulation in order to understand the effects. They should be scaled to Building 603 and not the new bluff.

Clarify if Halleck Street will remain historic (presuming it is) following reconstruction. Mason Street seems to be another prominent contributor that should be taken into account and included in the document.

Provide the locations and depths of the permanent drainage features described in the 5th bullet point, and describe the archaeological sensitivity in these areas.

There are several concerns with the appropriateness of the new plaza (Zocalo), with its circular connections “of the proposed modifications around Building 603 would be very useful.

Viewsheds from Crissy Field should be considered in assessing effects. If buildings are to be “scattered,” they should mimic a previous building siting vocabulary and be regimented and orderly. If the fact that buildings occupied this site previously is to be used as the reason why more buildings are allowable, then the previous building organization should guide the design and planning, too.

Recommend separating the elements of the undertaking for the New Presidio Parklands Project from the elements that will remain tied to the Doyle Drive EIR. The description of the current undertaking should reference the Doyle Drive action, but should clearly define where that undertaking ends and the Parklands undertaking begins. This will establish a baseline for assessing effects caused by the Parklands project and avoid the confusion that may result from mixing references to both together in the EA and 106 documents.

This is also part of the issue addressed by the SHPO’s comments regarding amending the Doyle Drive PA and the PTPA. The actual portion of the undertaking being transferred from FHWA/Caltrans to the Trust must be clearly defined. Elements common to all alternatives may require updates depending on the resolution of the agreement document negotiations.

Under Format for Assessing Effects, the document states that Alternative 2 responds to the Doyle Drive BETP, etc. It seems that this should refer to Alternative 3, the preferred alternative.

A photo-simulation of the proposed modifications around Building 603 would be very useful.

Clarify the scale of expansion being considered for Building 603. Because this is being included in the Parklands undertaking, the parameters need to be clearly stated. It is not clear if Halleck Street and Lincoln Boulevard should be included in the list of contributing resources within the APE. Halleck Street and Lincoln Boulevard are included in the non-contributors list, but both are called contributors on page 62. Halleck Street seems to be directly affected by the undertaking. Effects to Lincoln Boulevard are unclear.

The historic landscape is missing from the discussion of contributing resources within the APE with the potential to be directly affected. It should be considered equally with the built environment and archaeological resources as an important part of the NHLD.

Under the preferred alternative? What will be the dimensions and locations of these walls? There are several concerns with the appropriateness of the new plaza (Zocalo), with its circular elements, lack of clear description of the size, lack of information about what historic landscape elements (besides the trees) that are present and will remain. Also, renderings of this area should do a better job of indicating the scale of design elements.

50 Simulation 5. The Zocalo appears from this view and without the benefit of the context of surrounding buildings to be too natural looking and inappropriate for the foot of a previous military post.

53 – 54 Please demonstrate which historic connections exist between the upper and lower post along Halleck and Bank Streets, and how they are they being “protected.” The term “historic connections” is unclear. Clarify if it refers to those specific roads and their contributing status.

Bank Street’s status is unclear, as it has been omitted from the resources lists earlier in the document.

If buildings are to be “scattered,” they should mimic a previous building siting vocabulary and be regimented and orderly. If the fact that buildings occupied this site previously is to be used as the reason why more buildings are allowable, then the previous building organization should guide the design and planning, too.

First and second bullets will require revisions to reflect when the consultation meeting actually happens and concurrence on assessment of effect occurs.

Provide reason(s) why Alternative 2 was not chosen.

How many linear feet of concrete walls will be constructed at the three overlooks described under the preferred alternative? What will be the dimensions and locations of these walls?

This is also part of the issue addressed by the SHPO’s comments regarding amending the Doyle Drive PA and the PTPA. The actual portion of the undertaking being transferred from FHWA/Caltrans to the Trust must be clearly defined. Elements common to all alternatives may require updates depending on the resolution of the agreement document negotiations.

47 Simulation 2. The new elements in the landscape, including the amphitheater, paths, play structure, and poles sticking up are out of scale and too large for the setting. More information is required to assess potential effects on the NHLD.

42 – 51 A photo-simulation of the proposed modifications around Building 603 would be very useful.

Re-check the list of non-contributors that starts on page 30 for accuracy.

The Learning Landscape, Field Station, and Classroom buildings need further articulation in order to understand the effects. They should be scaled to Building 603 and not the new bluff.

The bluff walks from the embankment to Mason Street seem too wide, large, and inconsistent with pathways for strolling.

The Learning Landscape, Field Station, and Classroom buildings need further articulation in order to understand the effects. They should be scaled to Building 603 and not the new bluff.
in this section if “additions to Building 603” refers to the expansion of the building itself or the construction of the two new classroom buildings south of 603.

| 54 | With regard to the building replacing Building 211, it is difficult to agree that a 9,300 square foot building is “inconspicuous” or complies with the first bullet under Main Post Planning and Design Guidelines. |
| 55 | It is difficult to agree that adding a 9,300 square foot building emphasizes the openness of the area. Regarding bullet 3, clarify if the Presidio Promenade is the same feature as the proposed Bluff Walk. Clarify the criteria for areas designed for informal play and gathering. The children’s playground described in the 5th bullet sounds more formal what the guideline intends. While it is good that views of parked cars from Crissy Field will be “minimized” by topography and vegetation, the guideline states that the Trust will ensure that parked cars “cannot be seen from Crissy Field,” which is a stronger statement than minimizing their visibility. |
| 56 | The guidelines state that the Trust will evoke the form of the historic bluff. However, this undertaking intends to evoke the “character of a natural bluff face.” Clarify what the form of the historic bluff was and how the new planned bluff will evoke its form. Please note that “positively addressing” the applicable design criteria in these planning documents is not the same as fully complying with the applicable design criteria. |
| 57 | Clarify the ground disturbance expected from the construction of the New Observation Post. Clarify the grade change between the proposed location of the new building and Buildings 210 and 215. Clarify if the new building will be visible from Crissy Field. Clarify how the existing parking area will change. Provide the actual size of the existing Building 211. Its approximate size is given as 9,300 square feet. The guidelines of the new Building 211 need further and fuller definition. Using average height related to sea level is confusing. The SHPO recommends associating the height to existing historic buildings nearby. |
| 58 | Construction of the New Observation Post should be the subject of ongoing consultation and design review. Provide the detailed size constraints on the expansion proposed for Building 603. |
| 59 | The height comparison for new construction should be with Building 603 and not the new bluff. The guidelines fail to reference the design of the structures, their materials, and other details. The Secretary’s Standards should apply to all work to Building 603, not just the interior. Visibility analysis should include views from Crissy Field. |
| 60 | The document states that the largest new building will not exceed 5,800 square feet, which is half the size of Building 603. Provide the current area of Building 603’s footprint, as this would be a more reasonable point of reference for new construction. The document states that the total of new construction near Building 603 will not exceed 7,500 square feet. Please provide the analysis that supports that number. The document states that the total of new construction in the Crissy Field portion of the project site will not exceed 10,000 square feet. Please provide the analysis that supports that number. Also, provide details for other new construction being considered in that area. Provide details for flood control measures being considered. |
| 61 | The rehabilitation of Building 603, construction of two new classrooms, and other modifications in this location should be the subject of ongoing consultation and design review. Provide details regarding new hardscape features being considered in the location of the Zocalo. The information provided is not sufficient to assess effects (see previous comments). The area needs to be treated differently than an overlook in one of the more “rural” areas of the Presidio or the bluff itself because it is at the foot of the Main Post. Compatibility of new construction in this area with the historic vocabulary of the Main Post and Building 210 will be crucial to assessing effects. |
| 62 | According to the document, segments of Halleck Street and Lincoln Boulevard will be altered as part of this undertaking. Specify which alterations will occur as part of the Parklands project. This is another example of the clarity and separation needed between the Doyle Drive undertaking and the Parklands undertaking. If adverse effects to these contributors to the NHPD will occur as part of this undertaking, then they must be resolved and the preliminary finding of No Adverse Effect will not be accurate. Indirect effects on these two roads should be taken into account. |
| 63 | If testing or monitoring during construction identified archaeological features, the Trust’s plan... |

NPS AND SHPO LETTERS
needs to include notification and consultation with NPS and the SHPO. The Archaeological Monitoring Plan should be part of this consultation and submitted to the SHPO and NPS for comments.

Existing plans for ground disturbance and any modifications during design development should be part of ongoing consultation with NPS and the SHPO for the Quartermaster Complex, Quartermaster Dump, and Stream Ravine Dump.

The Archaeological Monitoring Plan should be shared with NPS and SHPO for comments.

At this point, the SHPO is unable to concur that there will be no cumulative adverse effects to the NHLD. Taking several current and future projects (Parklands, Building 201, Mason Street Warehouses, Building 610, Quartermaster Reach, Crissy Refresh, etc.) into account will be a challenge based upon the information submitted so far.

Draft Final Supplemental Design Guidelines, October 2015

General comment: The language in these guidelines is excessively permissive rather than assertive. This may have the effect of rendering the guidelines ineffective.

<table>
<thead>
<tr>
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<tr>
<td>2</td>
<td>Provide the reason that rehabilitation of Building 210 is not being included in the New Presidio Parklands Project.</td>
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<td>3</td>
<td>In the cross section at the bottom of the page, please clarify if Building 211 as shown represents the existing building or the proposed replacement.</td>
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<tr>
<td>7</td>
<td>Halleck Street and Lincoln Boulevard should be included in the list of contributing resources.</td>
</tr>
<tr>
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<td>Treatments should be compatible with the NHLD landscape, but landscape analysis seems to be absent from these guidelines. Any new construction should follow the rectilinear and regularized military development pattern used by the Army at the Presidio. This should be taken into account here as it was for the Letterman Hospital project. Provide the limits for new construction heights near Building 603 and if the height allowed by these guidelines be visible from the Main Post. Provide the square footage allowance for new buildings and clarify if they will be connected to Building 603. Excluding “structures” from the square footage restrictions in the design guidelines leaves an opening for an enormous amount of new construction of non-conditioned spaces. This should be capped as well, ideally at a small number of square feet. Please clarify if these guidelines are recommending only single-story buildings. The guidelines recommend breaking new buildings into smaller volumes. Clarify if there is a limit to the number of new buildings allowed under these guidelines in the Mid-Crissy sub-district. 10,000 square feet of new buildings and an unlimited amount of structures would likely constitute an adverse effect. Please clarify how unwanted use of new structures will occur if the new structures are open on the sides. Clarify what “additions to the horizontal ground plane” means. Clarify which point in Crissy Field’s development and history (and Period of Significance) the new construction will “respect.” The setting and architectural forms at Crissy Field have changed drastically over time.</td>
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<tr>
<td>22</td>
<td>Building heights should not exceed one story and should be aligned and compatible with Building 603 rather than the bluff itself. Clarify what new construction is proposed for the New Construction Zone at the west end of the Learning Landscape, as represented in Figure 20. Points A and B are reversed between the large figure and the smaller one. They should be consistent.</td>
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<tr>
<td>23</td>
<td>New decks, ramps, or access features should also not obscure the east or south sides of the building. “Concentrate new deck elements, as needed, on the south side of the building …” New deck elements are not recommended and are not necessary to rehabilitate the building. The highest point of new construction should be lower than Building 603, rather than lower than the top bluff elevation. The view from the bluff is not the only concern. Street visibility, roof planes, etc., could also cause effects, both adverse and cumulative. Wind turbines should not be recommended for this location. Compatibility of PV arrays, green roofs, or other sustainable features should be carefully considered and the subject of ongoing consultation. Please clarify if raising the grade near Building 603 is being considered. The four bullet points regarding future sea level rise and flooding are at odds with each other. Constructing flood control measures and raising the grade are not temporary measures and are not features that would allow for periodic flooding of the site.</td>
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<td>25</td>
<td>Make sure Figure 21 has the dotted line mentioned in the caption. It is missing in one of the versions we have reviewed.</td>
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<td>Treatments should be compatible with the NHLD landscape, but landscape analysis seems to be absent from these guidelines. Any new construction should follow the rectilinear and regularized military development pattern used by the Army at the Presidio. This should be taken into account here as it was for the Letterman Hospital project. Spatial Organization and Land Patterns – North and South views are also important and should not be obstructed by new construction. The highest point of the new building proposed to replace Building 211 should be lower than the top of Buildings 210 and 215. As stated earlier, the design of this building should be the subject of ongoing consultation. “New construction should relate to the overall scale and massing of existing buildings …”</td>
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<td>28</td>
<td>Use of “should” here and throughout the document is too permissive. Use of “relate” is vague. The scale of new buildings and possible roof variations must be compatible with the Main Post. Clarify why using new buildings or landscape features is being recommended as screening for the area between Building 220 and Graham Street. Removal of Building 211 is not a sustainable or green measure.</td>
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<td>29</td>
<td>The SHPO recommends revisiting the Letterman Hospital compliance regarding building materials and the color palette for guidance. Analysis of these features for new construction and additions occurred during that planning effort. At the very least, the details in the supplemental guidelines should agree with those from the Letterman consultation. Clarify and/or confirm if the guidelines will require that full brick be used or if a variety of brick products will be allowed, such as half brick or faux brick. Some Composition board materials may look and weather differently from natural or historically-used materials and should be carefully considered before selecting them. Metal roofing and trim may be allowed on service or shed roofs on small buildings and tertiary facades, but should not be used on primary elevations or on larger buildings.</td>
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</tr>
<tr>
<td>38</td>
<td>This page lists the Character Defining Features of Building 603. However, none of the features listed under “Less Sensitive” are historic or character-defining features and should be included under a different heading, such as later additions or non-historic modifications. The SHPO supports and recommends the removal of the glazed loading dock addition and restoration of the north elevation of the building.</td>
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May 5, 2016

Mr. Rob Thomson
Acting Federal Preservation Officer
The Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

RE: Tunnel Tops Project (formerly known as New Presidio Parklands Project), Presidio of San Francisco National Historic Landmark District

Dear Mr. Thomson:

The State Historic Preservation Officer (SHPO) received the March 15, 2016, letter from the Presidio Trust (Trust) that contained responses to comments supplied by the SHPO and National Park Service (NPS) regarding the Preliminary Finding of Effect and Supplemental Design Guidelines for the Tunnel Tops Project.

The Trust proposes to negotiate a Letter of Intent (LOI) with Caltrans to articulate the terms of transferring responsibility for the landscape on the Tunnel Tops from FHWA to the Trust. If successful, the Trust and Caltrans would then request that the Federal Highways Administration (FHWA) incorporate the transfer through a provision in the Doyle Drive Programmatic Agreement (PA) as a “minor change to the undertaking.” The Trust would also update its NEPA Finding of No Significant Impact (FONSI) to incorporate conditions for the project.

In previous correspondence, the SHPO articulated a position regarding transfer of the Tunnel Tops landscape from FHWA and the Doyle Drive PA to the Trust. This letter repeats and clarifies that position.

- FHWA is the responsible federal agency for the Doyle Drive PA. Any proposals regarding modifications to the undertaking or the PA should be initiated and transmitted to the consulting parties by FHWA.

- The SHPO does not consider the transfer of responsibility for the Tunnel Top landscape from FHWA to the Trust to be a “minor change” to the Doyle Drive undertaking. The method proposed by the Trust to transfer responsibility, as it would not comply with the Doyle Drive PA.

- Furthermore, neither the proposed LOI nor the NEPA FONSI is a Section 106 document. In order to satisfy the federal agencies’ Section 106 responsibilities, the transfer should occur within the Section 106 framework. Responsibility for the Tunnel Tops should likewise be accepted through a Section 106 mechanism, which is why the SHPO recommended Presidio Trust Programmatic Agreement (PTPA). Another mechanism, such as a project-specific agreement document could also be considered.

- Most importantly, the process of transferring responsibility should avoid confusing the public, which currently expects the Tunnel Tops to be treated in accordance with the Doyle Drive PA.

Finally, the SHPO continues to recommend that the consultation regarding the treatment of the tunnel tops that is currently within the Doyle Drive PA is separate to the consultation from what the Trust is conducting regarding their larger Tunnel Top project. As such, consultation and correspondence should remain separate until such time as they are possibly folded into a single action.

If you have any questions, please contact Mark Beason, State Historian, at (916) 445-7047 or mark.beason@parks.ca.gov.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

CC:
Vincent Mammano, Division Administrator
Federal Highway Administration - California Division
650 Capitol Mall, Suite 4-100
Sacramento, CA 95814-4708

Bijan Sartipi, District Director
Caltrans District 4
111 Grand Avenue
PO Box 23660
Oakland, CA 94623-0660

John M. Fowler
Executive Director
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington DC 20001-2637

Christine S. Lehnertz
General Superintendent
Golden Gate National Recreation Area
Fort Mason # 201
San Francisco, CA 94123
January 4, 2017

Mr. Rob Thomson
Federal Preservation Officer
The Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

RE: Tunnel Tops Project, Presidio of San Francisco National Historic Landmark District

Dear Mr. Thomson:

With this letter, the California State Historic Preservation Officer (SHPO) is responding to correspondence from the Presidio Trust (Trust) dated October 27, 2016, and continuing consultation with regard to the proposed undertaking at the Presidio of San Francisco. The Trust is consulting with the SHPO in order to comply with Section 106 of the National Historic Preservation Act of 1966 (54 U.S.C. § 306108), as amended, and its implementing regulations at 36 CFR Part 800. Along with the letter, the Trust provided a link to electronic documents to support the consultation. These include:

• A plan drawing illustrating the handover condition of the landscape when FHWA completes soil replacement and grading work;
• A plan drawing showing how each of the Doyle Drive Historic Preservation Criteria will be applied to the Tunnel Tops area during the Trust’s undertaking;
• Design documents and renderings for the proposed Learning Landscape area near the Crissy Field Center / Building 603.

The Trust anticipates sharing plans for tenant improvements to Building 603 and the new Observation Post and Transit Center in future consultation submittals.

In the October 27 letter, the Trust requested a consultation meeting to discuss responses to comments and supplemental design material provided in the March 15 consultation package. The Trust’s goal for the meeting is to resolve outstanding issues, reach consensus on a determination of No Adverse Effect, and conclude consultation on the undertaking. This request for a meeting was recently repeated in a letter dated December 22, 2016.
On November 8, 2016, SHPO staff emailed to inform you of the need for more time to conduct an internal review of the Trust’s submission and the related and recently proposed amendment to the Federal Highway Administration (FHWA) programmatic agreement (PA) for the Doyle Drive project. As communicated in subsequent emails (November 9 and December 2), this review is ongoing. While a consultation meeting among the Trust, NPS, ACHP, and SHPO is fine, it would be more productive after the issues with the proposed amendment to the Doyle Drive PA are clarified and resolved.

If you have any questions, please contact Mark Beason, State Historian, at (916) 445-7047 or mark.beason@parks.ca.gov.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

CC:
Vincent Mammano, Division Administrator
Federal Highway Administration - California Division
650 Capitol Mall, Suite 4-100
Sacramento, CA 95814-4708

Bijan Sartipi, District Director
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John M. Fowler
Executive Director
Advisory Council on Historic Preservation
Attn. Najah Duvall-Gabriel
401 F Street NW, Suite 308
Washington DC 20001-2637
March 27, 2017

In reply, reference to: TPT_2014_0904_001

Rob Thomson
Federal Preservation Officer
The Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

RE: Tunnel Tops Project, Presidio of San Francisco National Historic Landmark District

Dear Mr. Thomson:

The State Historic Preservation Officer (SHPO) appreciates the constructive meeting among the Presidio Trust, National Park Service, and Advisory Council on Historic Preservation on March 7, 2017. In accordance with the proposals in that meeting to continue consultation on this undertaking, the SHPO transmits the attached document. It contains the SHPO’s responses to the comment matrix supplied by the Trust in March 2016.

As you will see in the comments, the SHPO remains concerned about the potential for adverse effects to the National Historic Landmark District and Crissy Field presented by aspects of the proposed Tunnel Tops project design. These include the introduction of new visual elements at the north end of the Main Post (Zocalo, new Building 211); pathways, walls, and overlooks; amphitheater; learning landscape for the Crissy Field Center; new buildings proposed south of Building 603; and the rehabilitation plans for Building 603. As discussed in the March 7 meeting, the Trust has revised plans for much of the project since the last consultation meetings and will provide an updated and thorough description of the undertaking and updated renderings so the consulting parties can better understand the current state of the proposal. The consultation will continue upon the Trust’s submission of this information.

The SHPO submits the following comments and questions regarding the Tunnel Tops Archaeological Management Assessment (AMA) dated June 2015.

- Please provide better graphics or mapping that shows the three areas identified as potentially archaeologically sensitive in relationship to the proposed possible project elements such that effects might be better understood. Please also provide mapping such as overlays that geo-reference historic maps to modern features so that the interpretation of these features’ associations is clearly understood by the cold reader.

- The AMA states that archaeological monitoring will be performed in sensitive areas and, if deposits are encountered, they will be documented and efforts made at avoidance and preservation in place. Please explain what data sets would be required to be present such that each feature might contain important information (NRHP Criterion D) and thus warrant such avoidance and preservation efforts. For example, the context mentions a weighbridge at the Quartermaster Complex. What physical remains might be present at that location that would be evidence of the former weighbridge and how might those physical remains help us understand its use and role within the Complex?

- Preservation in place is identified as a management tool. Please provide details on how such preservation will occur, specifically management controls that the Presidio Trust will employ to make sure archaeological deposits are identified, protected, and not inadvertently affected during construction and long term management of the area.

- At the Quartermaster Dump, pages 12-13 of the AMA discuss how design should be completed to avoid affecting potential information-bearing deposits. Please explain how the Trust will follow through to ensure the design does in fact avoid these potential deposits and provisions for SHPO review of final decisions so as to ensure effects are less than adverse. Likewise for the Stream Ravine Dump; if project plans change, how will NPS perform additional consultation with SHPO?

If you have any questions, please contact Mark Beason, State Historian, at (916) 445-7047 or mark.beason@parks.ca.gov.

Sincerely,

Julianne Polanco
State Historic Preservation Officer
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<td>Please correct the statement regarding the APE to say that the SHPO offered comments regarding the sufficiency of the APE in an email dated May 5, 2015.</td>
<td>This statement will be crossed in the Final FOE to read that the SHPO's office indicated on May 5 that &quot;the APE appears to be sufficient to take both direct and indirect effects into account.&quot; The Trust would like to request formal concurrence from the SHPO on the APE as defined in its March 20, 2015 consultation package.</td>
<td>According to 36 CFR 800.4(a)(1), it is not the SHPO's role to concur with the APE as designated by the federal agency. The SHPO offers comments on the APE in consultation with the federal agency.</td>
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<td>Figure B. Consider including the Palace of Fine Arts in the APE.</td>
<td>Due to grade changes and the new Presidio Parkway on ramp, the project site is not visible from any point on the Palace of Fine Arts' property. Accordingly, the Trust will leave the APE as described in the FOE.</td>
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<td>5</td>
<td>Figure C. Consider Page 36. Explain why the reinstallation of Building 201 and associated landscaping is not being considered part of this undertaking.</td>
<td>The temporary relocation, storage, replacement and rehabilitation of building 201 and site on its east, north and south remain part of the Doyle Drive undertaking. The new paved area on the west elevation is part of the Tunnel Tops project; it replaces the paved vehicular loading area that formerly existed on the west elevation (at the now non-existent lower level) of 201. The new paved area retains the hardscape (as opposed to landscape) character of this area, while adapting it to pedestrian use rather than vehicular.</td>
<td>Language in assessment of effect needs to be more precise on this point. The sentence on page 36 does not provide sufficient details to assess effects. How is the new paved area west of Building 201 different from the Doyle Drive plan for reinstalling the building?</td>
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<td>10</td>
<td>Several sections will require revisions to reflect when the consultation meeting actually happens and concurrence on assessment of effect occurs.</td>
<td>Agreed; Trust will update in the final version.</td>
<td>SHPO will re-review when the revised assessment of effects is submitted.</td>
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<td>11</td>
<td>Recommend separating the elements of the undertaking for the New Presidio Parklands Project from those elements that will remain tied to the Doyle Drive project. The description of the current undertaking should not misconstrue the Doyle Drive action, but should clearly define where that undertaking ends and the Parklands undertaking begins. This will establish a baseline for assessing effects caused by the Parklands project and avoid the conclusions that may result from mixing references to both together in the EA and NE documents. This is also part of the issue addressed by the SHPO's comments regarding amending the Doyle Drive PA and the PTPA. The actual portion of the undertaking being transferred from FHWA/Caltrans to the Trust must be clearly defined. Elements common to all alternatives may require listing in a manner separate from the basis for assessment cause by the Doyle Drive action.</td>
<td>Agreed, pending further discussion.</td>
<td>The SHPO's comments aims to get the Trust to provide a clear definition of the undertaking (under heading 1.3 on page 11). The Trust agreed to do this in the March 7, 2017, meeting. Including portions of the Doyle Drive undertaking in the Trust's Tunnel Tops undertaking description confuses the reader. The information in the Trust's March 15, 2016, letter does not provide the necessary clarification, but refers to the design criteria in question. The design criteria are relevant in how the Trust will meet the responsibilities transferred from FHWA and the Doyle Drive PA, but they do not define the undertaking.</td>
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The Terraced Amphitheater seems out of place in this setting and should be reconsidered.

- Provide the locations and depths of the permanent drainage features described in the site plan, and explain the architectural sensitivity in these areas. The drawings seem to indicate that some of these walls will be orange in color. If that is indeed the case, the walls will be more conspicuous and not compatible with the natural landscape.

- Provide reasons why Alternative 2 was not chosen. Alternative 3 better satisfies the Tunnel Tops project's goals, as articulated in the Notice of Intent (other than in the EA). Specifically, the preferred alternative includes new classroom, program and outdoor education space for the Crissy Field Center youth programs, enhanced landscape, visual and view features, and a new Observation Post facility that does not impede historical views from the Main Post northwinds.

How many linear feet of concrete walls are constructed at the three overlooks? This is a Doyle Drive scope item that has already been built.

- Consider ways to further treat the concrete (including finish and/or ways to articulate the concrete) that will screen all or most of the outside face of the walls. There are several concerns with the amphitheater. Its scale and obvious as a new element that does not exist presently in the NHLD. It articulation needs some refinement or better description. The SHPO's concerns regarding the design of new features at Building 603 articulate in order to understand the design elements. Also,苋豆ie of this area should do a better job of indicating the scale of design elements. The site around building 603 was historically populated by single story gable roofed, wood frame warehouses that were for mercantile use (Merchants Warehouses). This character very much informs the design guidelines and the current proposal for two new buildings.

How many linear feet of concrete walls will be constructed at the three overlooks? The linear feet of concrete walls at each of the three overlooks are as follows (see Exhibit II for detailed sections of the overlooks): East Overlook: 187 LF Central Overlook: 179 LF West Overlook: 200 LF

- The inside face of the walls at each overlook are 2'. In some locations adequate required railing will extend the height to 42'. The dimensions of the outside face of the walls are as follows: Eastern Overlook: 4' to 6' that will screen all or most of the outside face of the walls. When looking at the site, there is a Doyle view scope that has already been built.

- The SHPO's concerns regarding the design of this area remain and will require further discussion as the consultation proceeds. The SHPO is concerned about the potential for adverse effects from these features. Confirm that plantings will sufficiently screen the long expanses of concrete to avoid an overbearing (and visible) new linear element in the landscape.

- The site around building 603 was historically populated by single story gable roofed, wood frame warehouses that were for mercantile use (Merchants Warehouses). This character very much informs the design guidelines and the current proposal for two new buildings.

- Taking the entire Landscape, Field Station, and Classroom buildings need further articulation in order to understand the effects. They should be scaled to Building 603 and not the new bluffs.

- Viewed from Crissy Field should be considered in assessing effects. If buildings are to be "scattered," they should mimic a previous building setting and will remain. Also,苋豆ie of this area should do a better job of indicating the scale of design elements. The site around building 603 was historically populated by single story gable roofed, wood frame warehouses that were for mercantile use (Merchants Warehouses). This character very much informs the design guidelines and the current proposal for two new buildings.

- The Learning Landscape, Field Station, and Classroom buildings need further articulation in order to understand the effects. They should be scaled to Building 603 and not the new bluffs.

- Viewed from Crissy Field should be considered in assessing effects. If buildings are to be "scattered," they should mimic a previous building setting and will remain. Also,苋豆ie of this area should do a better job of indicating the scale of design elements. The site around building 603 was historically populated by single story gable roofed, wood frame warehouses that were for mercantile use (Merchants Warehouses). This character very much informs the design guidelines and the current proposal for two new buildings.
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<td>It appears that Hallack Street and Lincoln Boulevard should be included in the list of contributing resources within the APE. Hallack Street and Lincoln Boulevard are included in the non-contributors list, but both are called contributions on page 62. Hallack Street seems to be directly affected by the undertaking. Effects to Lincoln Boulevard are unclear. Mason Street seems to be another prominent contributor that should be taken into account and included in the document. Re-check the list of non-contributors that starts on page 30 for accuracy.</td>
<td>Hallack and Lincoln are both listed as contributing resources in the APE (see p. 29 of the FOE). Hallack is listed as a resource that may be indirectly affected (see p. 30). The Trust will add Lincoln and Mason to that category as well as the final document, per this comment. Affected to Lincoln, if any, will be minor (such as removal of non-historic parking lot entrance and new crossing ramp); it will be added to the list of directly affected resources. Staff reviewed the non-contributing list and did note that 1029 was on there (it was demolished in the 1990s).</td>
<td>OK.</td>
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<td>33</td>
<td>The historic landscape is missing from the discussion of contributing resources within the APE. The potential to be directly affected should be considered equally with the built environment and archaeological resources as an important part of the NHSLD. The discussion on p. 52-56 of the FOE is meant to address how the project affects landscape resources. The Trust will commit to preserving the landscape in this manner.</td>
<td>According to the Preliminary FOE (page 53), the Trust has committed incorporating architectural criteria included in the Doyle Drive Architectural Criteria Report that are unfulfilled by the FHWA project upon handover of the project.</td>
<td>OK.</td>
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<td>37</td>
<td>Explain how the Trust is taking effect to Building 222 into account.</td>
<td>223 is appropriately listed as a contributing resource that has no potential to be affected, directly or indirectly (see p. 24). It is outside of the project site, and the project site is not visible from any point at the building (largely due to the location of 223 to its west).</td>
<td>OK.</td>
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<td>40</td>
<td>Under Format for Assessing Effects, the document states that Alternative 2 responds to the Doyle Drive BRTF, etc. It seems that this should refer to Alternative 3, the Doyle Drive project would have built had the parklands project not been proposed. Alternative 3 is also responsive to the Doyle Drive BRTF and Architectural Criteria, with additional elements that contribute in a meaningful way to the parklands project.</td>
<td>The SHPO’s concerns regarding the design of the Zocalo remain and will require further discussion as the consultation proceeds.</td>
<td>OK.</td>
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<td>A photo-illustration of the proposed modifications around Building 603 would be very useful.</td>
<td>Enclosed Exhibit C for architectural details of building 603 and its surrounding site.</td>
<td>OK.</td>
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<td>43</td>
<td>Simulation 2: The new elements in the landscape, including the amphitheater, paths, play structure, and poles sticking up are out of scale and too large for the setting. More information is required to assess potential effects on the NHSLD.</td>
<td>Enclosed Exhibit D for a refined description of the landscape and its elements.</td>
<td>OK.</td>
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<td>50</td>
<td>The Zocalo appears from this view and without the benefit of the context of surrounding buildings to be too natural looking and inappropriate for the foot of a previous military post.</td>
<td>The Zocalo is intended to be a pedestrian-scaled, mixed-use development. The character of this area is intended to be compatible with the landscape of the adjacent Main Post, but differentiated from the latter’s rigid, regular geometry, since that never existed north of Lincoln. This simulation was prepared to emphasize the views, and not necessarily the character of the Zocalo that will be experienced with the existing and new buildings on two sides, and Lincoln Boulevard on the third.</td>
<td>OK.</td>
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<td>53</td>
<td>Please demonstrate which historic connections exist between the upper and lower post along Hallack and Bank Streets, and how they are being “preserved.” The term “historic connections” is unclear. Clarify if it refers to those specific roads and their contributing status.</td>
<td>Hallack Street is outside of the project site. Hallack is a contributing roadway that is being re-established in its original alignment (with changes in elevation) by the Doyle Drive project. It will include vehicular, pedestrian and bike connections between the Main Post and Croissy Field. Hallack Street’s contributing status would be re-evaluated by the Doyle Drive project upon completion.</td>
<td>According to the Preliminary FOE (page 51), the Trust has committed incorporating architectural criteria included in the Doyle Drive Architectural Criteria Report that are unfulfilled by the HWA project upon handover of the site.</td>
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*The parulids project would retain, rehabilitate, and expand Building 603 consistent with the supplemental guidelines, which were developed to guide the appropriate rehabilitation and expansion of Building 603 (page 54). Apparent...*
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<td>With regard to the building replacing Building 211, it is difficult to agree that a 9,300 square foot building is “inconspicuous” or complies with the first bullet under Main Post Planning and Design Guidelines. Building 603 is being expanded. Therefore, the Trust should clarify the proposed expansion being considered for Building 603. Because it is being included in the Tunnel Tops undertaking, the parameters need to be clearly stated in order to understand the scope of work and to assess effects.</td>
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<td>It is difficult to agree that adding a 9,300 square foot building will not evoke the form of the historic bluff. The intent of siting the new building on the eastern edge of the site, aligned with Graham Street and non-historic building 215 is to open up the project site for pedestrian, landscaping/pedestrian use, rather than its current character, which is dominated by vehicles, parking lots and a non-historic building (211) that currently blocks views north from the Main Parade. The SHPO’s concerns regarding the design of the proposed new building replacing Building 211 remain and will require further discussion as the consultation proceeds.</td>
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<td>The intent behind replacing building 211 with a similarly sized (or smaller) new building is to remove an existing, highly conspicuous facility that blunders historic views from the Main Parade, and replace it with a compatible new facility that is more in concert with the prevailing organization of roads, views and existing buildings on the site. This point should be made more clearly in the FOE.</td>
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The largest new construction of the New Observation Post should be subject of ongoing consultation and design review.

Provide the detailed size constraints on the expansion proposed for Building 603.

Additional information regarding the New Observation Post is included in the enclosed Exhibit F. The Trust anticipates discussing these further at the next consultation meeting.

The size constraints on the two new buildings proposed to support an expanded Crissy Field Center program are described on pages 21-24 of the Supplemental Design Guidelines.

The intent of the Guidelines is to limit the height of new construction in relation to Building 603, so that it is subordinate, and not the main focus. This is limited from the Main Post. These relationships are described on p. 22-25 of the Supplemental Design Guidelines. Appropriate materials for new construction at this location are described on p. 24.

The sentence “As the design progresses, it would follow treatment recommendations in the final Supplemental guidelines regarding retention of all remain character defining features, and for new interior elements to follow the Secretary’s Standards,” is meant to be inclusive of the entire historic property, interior and exterior.

The single view in Simulation 2 is not sufficient to demonstrate that proposed new construction does not adversely affect resources in the Crissy Field area.

The Trust should provide this information in the FOE and explain why the proposed new buildings and rehabilitation / expansion of 603 do not constitute adverse effects.

The SHPO acknowledges that visibility of the proposed new construction at and around Building 603 from the Main Post is important. Ideally, the proposed new construction would also avoid adverse effects to 603 and other nearby contributing elements of the NHLD.

The SHPO is concerned about potential adverse effects from the overall size of the proposed buildings within the NHLD, especially when the project calls for a second new building in the promenade. The Trust’s FOE does not sufficiently make the case that this proposed new construction does not constitute adverse effect.

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### February 2016 SHPO Comments on the Preliminary Finding of No Effect, October 2015

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<td></td>
<td>- Underlining and the Parklands underlining. If adverse effects to these contributors to the NHLD will occur as part of this undertaking, then they must be resolved in full. The preliminary finding of No Adverse Effect will not be accurate.</td>
<td>The Trust will include a statement that the roads will not be indirectly affected in the final document.</td>
<td>Analysis in the FOE should provide evidence to support this statement.</td>
</tr>
<tr>
<td>6.1</td>
<td>- If testing or monitoring during construction identifies archaeological features, the Trust’s plan needs to include notification and consultation with NPS and the SHPO. The Archaeological Monitoring Plan should be shared with NPS and SHPO for comments.</td>
<td>The Trust has prepared an AMA and will prepare monitoring plans to ensure that activities that are part of this undertaking avoid adverse effects to archaeological resources.</td>
<td>The SHPO has some comments and questions about the AMA document and has submitted them along with this response to comments matrix.</td>
</tr>
<tr>
<td>6.5</td>
<td>- At this point, the SHPO is unable to concur that there will be no cumulative adverse effects to the NHLD. Taking several current and future projects (Parklands, Building 201, Masson Street Warehouses, Building 610, Quartermaster Reach, Crissy Refuse, etc.), into account will be a challenge based upon the information submitted so far.</td>
<td>The Trust is unsure what additional information is needed, and is respectfully requesting that the information provided to date. A full and clear project description is the main item that is missing.</td>
<td></td>
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### February 2016 SHPO Comments on the Draft Final Supplemental Design Guidelines, October 2015

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<tr>
<td>2</td>
<td>Provide the reasons that rehabilitation of Building 201 is not being included in the New Buried Parklands Project.</td>
<td>The rehabilitation of Building 201 as the Visitor Center is a separate action/undertaking from the Tunnel Tops; the two projects are adjacent but not contingent on one another. The VC has a separate budget, cleared N2 in December 2015, and will go into construction June 2016 in order to open in December 2016.</td>
<td>OK, but the Trust is more comfortable with the level of assessment for cumulative effect. The Parklands (Tunnel Tops) is the project described herein; the relocation and rehabilitation of Building 201 is part of the Doyle Drive project; the plans for Building 609 are unchanged from PTMP; Quartermaster Reach is a project that addressed a No Adverse Effect finding in consultation with the SHPO’s office in 2014; Crissy Refuse remains in early concept development by the NPS and OGCNP.</td>
</tr>
<tr>
<td>3</td>
<td>In the cross section at the bottom of the page, please clarify if Building 201 as shown represents the existing building or the proposed replacement.</td>
<td>The building shown in the cross section represents the existing Building 211 (an exhibit to this package, the Trust will address them accordingly.</td>
<td>See the comments in this column for additional information requested based upon the information provided to date.</td>
</tr>
<tr>
<td>7</td>
<td>Ballock Street and Lincoln Boulevard should be included in the list of contributing resources.</td>
<td>The resources have been added.</td>
<td>OK – check revised guidelines.</td>
</tr>
<tr>
<td>21</td>
<td>Revisions should be compatible with the NHLD landscape, but landscape analysis as seems to be absent from these guidelines. Any new construction should follow the rectilinear and regularized development pattern used by the Army at the Presidio. This should be taken into account here as it was for the Letterman Hospital project. Provide the limits for new construction heights near Building 603 and if the height allowed by these guidelines is feasible from the Main Post. Provide the square footage allowances for new buildings and clarify if they will be connected to Building 603. Excluding &quot;structures&quot; from the square footage restrictions in the design guidelines leaves an opening for an enormous amount of new construction of non-conditioned spaces. This should be</td>
<td>As stated on p. 4, the Guidelines “do not replace the earlier documents (including the 2012 Main Post CLR and 2011 Mid Crissy Area Design Guidelines)” but are rather incorporated by reference. The passage goes on to state that the Guidelines are intended primarily to guide new construction. The Trust has added a statement estimating the applicability of the treatment recommendations from the CLR/previous guidelines to the beginning of each section for clarity. The Trust agrees with the comment and believes that the Guidelines that begins “Ensure that any new construction…” and the project proposal itself reflect this comment. It is worth noting that the historic pattern of development in both the Crissy and Main Post areas of the project were rectilinear, but not regularized (like the Montgomery Street Barracks, for instance). The Trust has revised the section on rectilinear to clarify its intended meaning, which is to characterize site elements. The Trust also does not wish to allow for enormous amounts of new construction of non-conditioned spaces.</td>
<td>A redline version of the Guidelines would be helpful.</td>
</tr>
<tr>
<td></td>
<td>The maximum average height of buildings on this site, per the Guidelines is 18’ from grade, which does imply a single story building. The current proposal also includes single story buildings only.</td>
<td>The maximum average height of buildings on this site, per the Guidelines is 18’ from grade, which does imply a single story building. The current proposal also includes single story buildings only.</td>
<td>Maximum average height of what? In that per building or total?</td>
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<tr>
<td>22</td>
<td>Building heights should not exceed one story and should be aligned and compatible with Building 603 rather than the bluff itself.</td>
<td>Agreed. The Trust has included height limits that keep any new construction subordinate to 603 and below the bluff top elevation.</td>
<td>Subordinate doesn’t only mean short. Where will this be located and what will it look like?</td>
</tr>
<tr>
<td>23</td>
<td>New decks, ramps, or access features should also not obscure the east or west sides of the building. “Concentrate new deck elements, as needed, on the south side of the building.” “New deck elements are not recommended and are not necessary to habitable floor building.” The highest point of new construction should be lower than Building 603, rather than lower than the top of the bluff elevation. The view from the bluff is not the only concern. Street visibility, roof planes, etc., could also cause effects, both adverse and cumulative. Wind turbines should not be recommended for this location. Compatibility of PV arrays, green roofs, or other sustainable features should be carefully considered and the subject of ongoing consultation. Please clarify if raising the grade near Building 603 is being considered. The four bullet points regarding future water level impact and flooding are at odds with each other. Constructing flood control measures and raising the grade are not temporary measures and are new features that would allow for periodic flooding of the site.</td>
<td>The Trust agrees regarding the east (primary) elevation; however, we respectfully disagree regarding the south elevations. This was historically the (background) elevation, so typifies an appropriate pace for new features to support the building’s urban and adaptive reuse. The intent of this guideline is to direct new additions to the building’s rear, and away from the character defining loading docks on the north and west elevations, and historic pedestrian entrance on the east. A new deck is proposed for the south elevation in order to support access, circulation and new programs at the rear of the building. Agreed. The highest point of allowable new construction is 13.5 below the peak of 603. There is also a desire to limit visibility of new construction from the Main Post, which is why the bluff elevation is ideal. Agreed. Reference to wind turbines have been removed from the final document, and emphasis on compatibility for other features added. The compatibility objective will ideally be balanced with the Crissy Field Center’s focus on environmental leadership and education, and the agency’s high aspirations around energy use and on site energy production. The project will use the Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings to guide this goal. Raising the grade by 2.5’ in the area behind 603 only is encouraged as a means to guard against sea level rise in this flood prone area. It has the additional benefits of keeping new construction out of nomination land use zones, archaeological sensitivity zones, and facilitating accessibility connections to existing pedestrian/bike facilities.</td>
<td>Both should be referenced in the guidelines then. Not a final document. Compatibility will depend upon historic character, not Crissy Field Center’s focus and aspirations.</td>
</tr>
<tr>
<td>25</td>
<td>Make sure Figure 21 has the dotted line mentioned in the caption. It is missing in one of the versions we have reviewed.</td>
<td>Agreed. This line was missing in the September draft, but added to the October Draft Final.</td>
<td>OK</td>
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<tr>
<td>27</td>
<td>Treatments should be compatible with the NELHD landscape, but landscape analysis seems to be absent from these guidelines. Any new construction should follow the rectilinear and regularized military development pattern used by the Army at the Presidio. This should be taken into account here as it was for the Letterman Hospital project. Spatial Organization and Land Patterns—North and South views are so important and should not be obstructed by new construction. The highest point of the new building proposed to replace Building 211 should be lower than the top of Buildings 210 and 215. As stated earlier, the design of this building should be the subject of ongoing consultation. “New construction should relate to the overall scale and massing of existing buildings...” Agreed; the reference to the Bay views is in deference to views to the north. Also, the areas called out for allowable new construction (and the proposed removal of 211) are organized to open north-south views. The intent of this guideline is to screen the non-historic, auto-centric parking area between 220 and Graham, and the bus depot along Graham, from the pedestrian-oriented Zocalo and landscape to the west and north. The Trust has removed “should” from the guidelines and made the language more directive. “Relate” remains a useful word that connotes compatibility. The change has been made to the Final Guidelines.</td>
<td>See response above to SHPO’s comment on page 21 of the Guidelines.</td>
<td>Unresolved, but removal of the non-historic building is an idea that enjoys widespread support by the public and agency partners, and greatly enhances historic views and the landscape character in this area of the project site. Understood, but removal of the non-historic building is a sustainable or green measure.</td>
</tr>
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</table>

- The Letterman Hospital Planning & Design Guidelines (2000) are indeed a useful and effective document for that area of the NELHD. However, the Trust developed site-specific Planning & Design Guidelines for the Main Post (2011) and Mid-Crissy Area (2011) in consultation with PA parties, in addition to these Guidelines, in order to direct new construction and other treatments in these specific areas.
- The goal with this material recommendation is compatibility with the Montgomery Street Barracks, a prohibition on faux brick has been added as it likely would not be sustainable or green and shouldn’t be presented that way. | |

| 28   | Excluding non-conditioned, unenclosed space from the square footage restrictions in the Design Guidelines leaves an opening for an enormous amount of new construction of non-conditioned spaces. This should be capped as well, ideally at a small number of square feet. Points A and B are reversed between the large figure and the smaller one. They should be consistent. The intent behind using a maximum height and average height was to allow for pitched roofs or roofs of varying heights (in order to break up volumes). The Trust is providing additional information regarding the specific proposal for new construction in this location for discussion at the next consultation meeting in Exhibit F. | See above response to SHPO’s comment on page 21 of the Guidelines. | Analysis should state: | |
### Page 215

**Comment:**

Some Composition board materials will be allowed, such as half brick or faux brick. Metal roofing and trim may be allowed on service or shed roofs on small buildings and terry facades, but not for use on primary elevations or on larger buildings.

**PT Response to Comments:**

The use of composition brick in these guidelines is based on its use at building 215 (built 2005), where it has weathered and maintained its compatibility in a satisfactory way.

**SHPO response to PT response to SHPO comments:**

Agreed. Language encouraging judicious use of metal roofing has been added to the final Guidelines.

**SHPO recommendations:**

The SHPO respectfully disagrees: given the available documentation, the building is recent rehab, and the limited interior integrity of Building 603, the Trust finds the information in the Guidelines to be adequate for identifying remaining character defining features and directing the preservation actions to this building.

### Page 603

**Comment:**

The Trust should downsize the amphitheater and use appropriate plantings to break up the uniformity of the steps as seen from adolescence.

**PT Response to Comments:**

In response to the comment, the Trust reviewed the Supplemental Design Guidelines to identify treatment measures that apply to character-defining features, and revised the guidelines in those instances to be prescriptive, rather than discretionary.

**SHPO response to PT response to SHPO comments:**

The SHPO supports and recommends the removal of the glazed loading dock addition and restoration of the north elevation of the building.

**SHPO recommendations:**

The Trust should also consider the effect of removing the amphitheater and use appropriate plantings to break up the uniformity of the steps as seen from adolescence and the surrounding landscape character.

### Page 220

**Comment:**

The Trust should ensure that the treatment of the “structures” in the Learning Landscape is not to allow for three play structures in the Learning Landscape.

**PT Response to Comments:**

The Trust respectfully disagrees. The cumulative effects on historic resources are fully addressed in the FOE, including all points raised by the commenter as discussed below. Furthermore, the Trust finds the analysis to be adequate under NEPA and the NHPA and the applicable regulations.

**SHPO response to PT response to SHPO comments:**

The Trust should also consider the effect of removing the amphitheater and use appropriate plantings to break up the uniformity of the steps as seen from adolescence and the surrounding landscape character.

**SHPO recommendations:**

The Trust should also consider the effect of removing the amphitheater and use appropriate plantings to break up the uniformity of the steps as seen from adolescence.

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**Page Number** | **Comment** | **PT Response to Comments**
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**Comment:**

The Trust should reexamine the findings of effect (F0E) for the cumulative effects on historic resources (NPS). The Trust should acknowledge the rehabilitation of the Mason Street Warehouses as an adverse effect. The Trust should also consider the effect of removing the Commissary building entirely, and the effect of the project on the former Post Headquarters and redesign of Halleck Street and associated area of historic Building 201.

**PT Response to Comments:**

The Trust respectfully disagrees. The cumulative effects on historic resources are fully addressed in the F0E, including all points raised by the commenter as discussed below. Furthermore, the Trust finds the analysis to be adequate under NEPA and the NHPA and the applicable regulations.

**SHPO response to PT response to SHPO comments:**

In response to the comment, the Trust reviewed the Supplemental Design Guidelines to identify treatment measures that apply to character-defining features, and revised the guidelines in those instances to be prescriptive, rather than discretionary.
Response to Comments

Page Number | Comment | PT Response to Comments
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2 | Move the caption for Figure 2 circa 1916 per the comment. | Caption added.
3 | Move the caption for Figure 2 to the lower left-hand side of the image so the design is consistent with the other figure pages. | The caption has been corrected.
4 | Deletions: “In anticipation of new construction associated with the expansion of Building 603 to support the CFC.” As you are not proposing to directly construct additions to the footprint of Bldg. 603, perhaps change the text to “expansion of features associated with Building 603?” | Language was clarified
6 | Provide photo date for this image and if room allows, a caption that provides context with information about the direction of view. | Caption added per the comment.
8 | This photo needs a date and if room allows, a caption that provides context with information about the direction of view. | Caption added: “1925 aerial view of Crissy Field and the Main Post looking south.”
10 | Deletions: “the onset of World War I cut the PPIE short” is inaccurate. | Language was clarified
10 | Deletions: “...and Letterman planning districts, which include the two requested buildings among others. Both buildings are listed in the FOE as contributing resources in the APE with the potential to be indirectly affected.” The FOE acknowledges that the undertaking would result in visible change to the landscape when viewed from contributing resources. However, conformance with applicable design guidelines and planning documents would ensure consistency with the Secretary’s Standards and compatibility with the character-defining features of the NVHBD and its contributing resources, including buildings 229 and 218. | Language was clarified
18 | The Area of Potential Effect (APE) was established through consultation and described as “sufficient” by the State Historic Preservation Officer (the Trust has requested formal concurrence). The APE consists of the Main Post, Crissy Field and Letterman planning districts, which include the two requested buildings among others. Both buildings are listed in the FOE as contributing resources in the APE with the potential to be indirectly affected. The FOE acknowledges that the undertaking would result in visible change to the landscape when viewed from contributing resources. However, conformance with applicable design guidelines and planning documents would ensure consistency with the Secretary’s Standards and compatibility with the character-defining features of the NVHBD and its contributing resources, including buildings 229 and 218. | Language was clarified
19 | The PPIE continued its full operational schedule and closed, as planned, in December 1915. | Added text to the comment.
21 | “new construction associated with Bldg 603 will favor permeable and open façade”.
22 | “new deck, ramp or access features will obstruct historic relationship”.
22 | “New construction must use materials from the following list”.
25 | “New construction must be set back from the bluff edge to avoid...”
26 | “New construction must use materials from the following list”.
27 | Deletions: “new construction that is temporary in nature or can be easily repaired or replaced in the event of damage due to flooding.” Please elaborate or spell out more clearly how new construction will be “temporary in nature” while also being architecturally compatible within Crissy Field. | Temporary construction is now being considered; removed “is temporary in nature” from text.
29 | New text reads: “Green (living) roofs...” for clarity.
30 | New text reads: “Green roofs for clarity.” | Language added that each element may only


Page Number | Comment | PT Response to Comments
---|---|---
10 | (Para 4) – largely consisted of military, motor pool, storage and warehouse buildings. | Added to text per the comment.
11 | Figure 4: please provide date – circa 1916 to this photo. | Date added per the comment.
14 | (Para 4) – largely consisted of military, motor pool, storage and warehouse buildings. | Added to text per the comment.
18 | Figure 4: please provide date – circa 1916 to this photo. | Date added per the comment.
21-29 | Sub-District Design Guidelines; there are numerous instances where the SDGs are discretionary and not prescriptive about the treatments of key character-defining features. In order to make it clear that the guidelines are mandatory, please replace “should” with “will” in the following places: Main Post Sub District
- p. 21 “new construction associated with Bldg 603 will favor permeable and open façade”
- p. 23 “new deck, ramp or access features will obstruct historic relationship”
- p. 23 “New construction must use materials from the following list” Main Post Sub District
- P. 27 “New construction must be sited to the north of existing buildings...”
- New construction must be set back from the bluff edge to avoid...” | Wording changed for clarity.
22 | “New construction must use materials from the following list” Main Post Sub District
- p. 21 “new construction associated with Bldg 603 will favor permeable and open façade”
- p. 23 “new deck, ramp or access features will obstruct historic relationship...”
- p. 23 “New construction must use materials from the following list” Main Post Sub District
- P. 27 “New construction must be sited to the north of existing buildings...”
- New construction must be set back from the bluff edge to avoid...” | Text removed.
23 | “New construction must use materials from the following list” Main Post Sub District
- p. 21 “new construction associated with Bldg 603 will favor permeable and open façade”
- p. 23 “new deck, ramp or access features will obstruct historic relationship...”
- p. 23 “New construction must use materials from the following list” Main Post Sub District
- P. 27 “New construction must be sited to the north of existing buildings...”
- New construction must be set back from the bluff edge to avoid...” | Wording changed.
24 | “New construction must use materials from the following list” Main Post Sub District
- p. 21 “new construction associated with Bldg 603 will favor permeable and open façade”
- p. 23 “new deck, ramp or access features will obstruct historic relationship...”
- p. 23 “New construction must use materials from the following list” Main Post Sub District
- P. 27 “New construction must be sited to the north of existing buildings...”
- New construction must be set back from the bluff edge to avoid...” | Text added that PVs or other sustainable features would be selected based on compatibility, per SHPO comment above.
27 | Average height discussion: Consider adding language that offers an... | Language added that each element may only
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<td>Bullet 2: Breaking new buildings into smaller volumes in order to disperse their mass... needs clarification or better wording. This guideline could be recast as the permission to build more, smaller buildings which would risk &quot;littering&quot; this sub district. Language added to clarify that “breaking new buildings into smaller volumes” only applies to the limited areas within the site where new construction is allowed (new buildings are not allowed outside of these areas).</td>
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<tr>
<td>30</td>
<td>No photo date for Figure 25 &amp; 26. In Figure 26 caption, please add, “The Transit center, constructed in 2004, is an example...” Capsions added.</td>
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</tr>
<tr>
<td>31</td>
<td>Arrow symbol unclear. Please demonstrate clear and formalize the wording that a full blown or unabbreviated HSR was not warranted... Text corrected per the comment.</td>
<td></td>
</tr>
<tr>
<td>32</td>
<td>Bullet 2: Editing inaccurate sentences: “The army removed many of the site’s utilitarian structures in preparation for the City of San Francisco’s 1915 Panama-Pacific International Exposition. After the PPIE cleared December 1915, and with America’s competing for acrobatic involvement in the European War...” However with the onset of World War I, the army quickly replaced the elaborate temporary city. Text corrected to 1915.</td>
<td></td>
</tr>
<tr>
<td>32</td>
<td>Bullet 2: “The landscapes was further altered in 1916, with the completion of Fort Mason to support the new Golden Gate Bridge...” The word “was” removed in Text corrected per the comment.</td>
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</tr>
<tr>
<td>32</td>
<td>Bullet 3: “The site changed again with a flurry of construction in the run up to World War II...” Captions edited.</td>
<td></td>
</tr>
<tr>
<td>33</td>
<td>Points 1, minimal Spanish Colonial Revival Mission Revival features. Please see the NPS July 2015 comments from the Bldg 99 HSR: There needs to be a consistent agreement and use of the two architectural styles “Mission Revival” and “Spanish Colonial Revival.” At GGNSA, we identify the early, pre-1930s army stucco buildings (San Francisco Port of Embarkation, circa 1912; Fort Winfield Scott, circa 1917 &amp; the earliest buildings constructed in relation to the development of Crissy Field, circa 1920s) as Mission Revival. They are the very simple, adobe-white stucco buildings with red roof tiles where the only decoration is the shadow play between the deep and arched fenestration pattern. During the 1930s, especially at the Presidio, this style became more “stylized” if you will, into the more ornamented, thickly-plastered and almost Baroque Spanish Colonial Revival. Test corrected per the comment.</td>
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</table>
the meeting. The SHPO can be available by phone for approximately two hours on the following dates and times: February 21 between 1 PM and 4 PM; February 23 between 10 AM and 12 PM; March 7 between 9 AM and 12 PM; March 21 between 1 PM and 4 PM; or March 28 between 1 PM and 4 PM.

As previously stated in correspondence and meetings, the Trust is consulting on an undertaking for which portions are currently under the jurisdiction of another agency, the Federal Highways Administration (FHWA) and its Programmatic Agreement for the Doyle Drive Replacement undertaking (Doyle Drive PA). Until responsibility for the current FHWA portions is formally transferred from the Doyle Drive PA to the Trust, the Trust proceeds with consulting on the FHWA portion of the Tunnel Tops undertaking at its own risk. It is possible that the Trust may be required to further consult on those parts of the undertaking occurring before transfer of responsibility and currently covered by the Doyle Drive PA once the transfer is complete.

For these reasons, the SHPO has repeatedly advised it is consulting on the Tunnel Tops project only for the portions of the project currently under the purview of the Trust.

In an attempt to eliminate confusion, SHPO comment periods begin upon receipt of the original paper copy correspondence rather than from a date contained within email correspondence. For example, the Trust’s January 16, 2017, letter was not received in this office until January 27, so the 30-day response period would not begin until January 27.

If you have any questions, please contact Mark Beason, State Historian, at (916) 445-7047 or mark.beason@parks.ca.gov.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

CC:
John M. Fowler
Executive Director
Advisory Council on Historic Preservation
Attn. Najah Duvall-Gabriel
401 F Street NW, Suite 308
Washington DC 20001-2637

Craig Kenkel
Acting Superintendent
Golden Gate National Recreation Area
Attn. Stephen Haller
Building 201 Fort Mason
San Francisco, CA 94123

Laura Joss
Regional Director, Pacific West Region
National Park Service
Attn. Elaine Jackson-Retondo
333 Bush Street
San Francisco, CA 94104-2828
October 4, 2017

Mr. Rob Thomson
Federal Preservation Officer
The Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052

Subject: Tunnel Tops Project, Presidio of San Francisco National Historic Landmark District

Dear Mr. Thomson:

I have received and reviewed the information submitted by the Presidio Trust (Trust) prior to the September 15, 2017, meeting and emailed to my office on September 25 regarding the above-referenced undertaking at the Presidio of San Francisco. The Trust is consulting with the California State Historic Preservation Officer (SHPO) in order to comply with Section 106 of the National Historic Preservation Act of 1966 (54 U.S.C. § 306108), as amended, and its implementing regulations at 36 CFR Part 800 and the 2014 Programmatic Agreement Among the Presidio Trust, National Park Service, the Advisory Council on Historic Preservation, and the California State Historic Preservation Officer Regarding the Presidio Trust Management Plan and Various Operation and Maintenance Activities for Area B of the Presidio of San Francisco National Historic Landmark District, Golden Gate National Recreation Area, San Francisco, California (PTPA).

The Trust proposes to conclude consultation on the entire Tunnel Tops undertaking with a "conditional no adverse effect," or, as it is described in the PTPA, "historic property affected, no adverse effect through conditions."

As mentioned in the September 15 meeting and in an email from my staff on September 29, I am willing to consider resolving consultation for the entire undertaking with a Finding of No Adverse Effect through Conditions. I also agree that further consultation to establish these conditions is the appropriate next course of action. To that end, I submit this letter to assist in minimizing effects on the National Historic Landmark District (NHLD) and resolving the consultation. The following list references the comment matrix and line numbers from the chart emailed to the consulting parties by the Trust on September 29.

**General Comment**

- As a condition for the Finding of No Adverse Effect, the SHPO recommends modifying the designs to avoid adverse visual intrusion caused by new paving. The use of Integral Colored Concrete (or something similar) for any new concrete will reduce the visual prominence of the overlooks and paths. Alternatives to solid concrete pavement that would reduce the hardscape and visual effect of new paving should also be considered.

**Building 603 Rehabilitation**

- Item 1: No further consultation regarding the historic loading dock is necessary. From the SHPO’s perspective, this item is resolved.
- Item 2: No further consultation regarding the new canopy is necessary. From the SHPO’s perspective, this item is resolved.
- Items 16 – 17: The SHPO agrees with the rehabilitation approach described. The Trust has sufficiently documented the integrity and work proposed for the interior of Building 603 and no further consultation about it is necessary.
  - However, the SHPO proposes continuing consultation on the glass annex on the north side of Building 603 as a condition for the No Adverse Effect finding. For this consultation, please provide full-size 50% Construction Documents of this feature, along with any applicable specifications and cut sheets.

**Terraced Seating**

- Items 3 – 6: Design is better and responsive to previous comments. The SHPO proposes continuing consultation on the final design and detailing of this feature as a condition for the No Adverse Effect finding. Please provide full size 50% Construction Documents for this feature.

**Western Hollow**

- Item 7: No further consultation regarding this item is necessary. From the SHPO’s perspective, this item is resolved.
- Items 8, 13 (Welcome Plaza), 14 and 15 (Bluff Top Landscape): The SHPO appreciates the effort to make the north edge of Lincoln Boulevard a transition area between the Main Post and the Tunnel Tops area.
However, the curvilinear design as shown in the documents provided by the Trust erodes the historic military distinctions that are character-defining features of the Main Post area of the National Historic Landmark District.

The SHPO proposes that the Trust implement a more rectilinear design for pathways in this transition area as a condition for the No Adverse Effect finding. SHPO proposes the Main Post transition area be defined as the area from the north edge of Lincoln Boulevard to a line approximately three feet north of the current Observation Post (Building 211) and extending east to the Transit Center (Building 215).

Canteen
- Item 9: Removing the new Canteen Building from the design is responsive to previous comments and appreciated.
  - However, the information provided for the replacement proposal of a new canopy and outdoor dining area is not well defined in the information provided.
  - The SHPO proposes continuing consultation on 50% Construction Documents as a condition for the No Adverse Effect finding.

Building 201
- Based upon the clarification provided by the Trust that the rehabilitation of Building 201 will be subject to a separate consultation, the SHPO has no further comments.
  - However, the design of the new outdoor use of the area adjacent to the west side of Building 201 requires further consultation. The SHPO proposes continuing consultation on 50% Construction Documents as a condition for the No Adverse Effect finding.

Overlooks and Paths
- Items 11 and 12: The SHPO is concerned about the visual prominence of the paths and overlooks.
  - Continuing consultation on this point is a condition for the Finding of No Adverse Effect.
  - In continuing consultation on this item, the Trust should describe how it intends to reduce the visual prominence through material choices. As mentioned in the General Comment above, integral colored concrete and paving alternatives should be used where possible.

Crissy Youth Campus
- General comment: Articulation issues need to be resolved as a condition for the Finding of No Adverse Effect. Provide full-size drawings as the design continues to be developed.
- Item 18: “Trust will engage designer to study this issue (reorienting the buildings) further, offer alternatives in order to resolve.” The SHPO agrees to continuing consultation on this item as proposed and as a condition for the Finding of No Adverse Effect.
- Item 19: “Trust will engage designer to study this issue (considering a single building instead of two) further, offer alternatives in order to resolve.” The SHPO agrees to continuing consultation on this item as proposed and as a condition for the Finding of No Adverse Effect.
- Item 20: Reduction of the canopy is responsive to previous comments. From the SHPO’s perspective, this item is resolved.
- Item 21: The SHPO recommends Presidio white, horizontal siding and red roofs for the new building(s) as a condition for the Finding of No Adverse Effect.
- Items 22 and 23: Fenestration design for the new buildings is responsive to previous comments in the change to horizontal windows rather than vertical. In the September 15 meeting, the Trust proposed using the full-frame wood windows in the Mason Street Warehouses as a design precedent, and to engage the designer “to study this issue further, offer alternatives in order to resolve.”
  - The SHPO agrees to continuing consultation on specific details and articulation of the new building(s) as a condition for the Finding of No Adverse Effect.

Learning Landscape
- Item 24: Regarding the proposed berm along Mason Street, the Trust proposed to engage the designer “to study this issue further, offer alternatives in order to resolve.”
  - The SHPO agrees to continuing consultation on this item as proposed and as a condition for the Finding of No Adverse Effect.
Items 25 and 26: Regarding the design of the Learning Landscape, the Trust proposes a 30-day review of 50% Construction Documents as a condition for the Finding of No Adverse Effect.

The SHPO agrees to continuing consultation on this item as proposed and as a condition for the Finding of No Adverse Effect.

Cumulative Effects

The SHPO remains concerned about the gradual degradation of the NHLD that could be caused by undertakings and proposed designs that are not compatible with the historic types of the military landscape and the distinctive uses within specific areas of the NHLD.

If the design issues and conditions listed above can be resolved through consensus agreement, the SHPO can concur with the proposed Finding of No Adverse Effect.

The SHPO recognizes that adherence to specified review periods will be necessary and proposes a standard 30-day review by PTPA signatory parties for each of the items requiring further consultation. If signatory parties need an extension, they may take an additional 10 days to submit comments.

Consensus agreement on the design questions above will be necessary to implement the undertaking in accordance with the Finding of No Adverse Effect with Conditions. If agreement is reached, then consultation will be considered complete.

If the Trust objects to recommendations made by signatory parties, further consultation will occur. If agreement is not reached, the Finding of No Adverse Effect with conditions may be rescinded, in which case the Trust should follow the dispute resolution clause in the PTPA.

If there are any questions regarding the comments and conditions described in this letter, please contact Mark Beason, State Historian, at (916) 445-7047 or mark.beason@parks.ca.gov.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

CC:
John M. Fowler, Executive Director, Advisory Council on Historic Preservation
Cicely Muldoon, Acting Superintendent, Golden Gate National Recreation Area
Laura Joss, Regional Director, Pacific West Region, National Park Service
November 21, 2017

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Reference: Consultation on Presidio Tunnel Tops – Conditional Finding of No Adverse Effect

Dear Colleagues:

This letter serves to document and define the parameters of a Conditional Finding of No Adverse Effect for the Presidio Tunnel Tops project (undertaking).

The undertaking is a 14-acre project comprised of the landscaped area at the north end of the Main Post, over the eastern tunnel of the Presidio Parkway and extending into portions of mid-Crissy Field. The project includes the rehabilitation of National Historic Landmark (NHL) - contributing building 603 (Post Exchange, 1939) to accommodate a Crissy Field Youth Center, construction of two new buildings (601 and 602) to support the building 603 program, and the demolition of non-historic building 211 (CafeTea, 1968). The project scope also includes landscaping, paths, furniture, and overlooks to support public use of the new landscaped area.

Following a final consultation meeting on October 31, the parties agreed to the following conditions necessary to achieve concurrence on a determination of “no adverse effect with conditions” pursuant to Section IV.C.2.d.1.d of the PTPA. The conditions necessary for concurrence are listed below:

Section I: Items Requiring Additional Review

Transit Café Patio Shelter
- The undertaking proposes a rectangular covered patio area of approximately 950 square feet located immediately north of existing building 215 and oriented parallel to Graham Street. The design of the canopy structure will be open, light, transparent, and visually subervient to the Transit Center. The finishes, lighting, and roof material of the canopy will be determined during the design phase.

Learning Landscape Play Elements
- The Tunnel Tops project proposes a set of play elements in the Learning Landscape as detailed in the July 20, 2017, consultation package.

For the Learning Landscape Play Elements and the Transit Café Patio Shelter:
- The Trust will submit a full-size 100% schematic design package (SD) for buildings, structures, and landscape to signatory parties that describes the design of the patio shelter and Learning Landscape play elements.
- Within 15 calendar days, signatory parties will return written comments to the Trust confirming that the patio shelter and play elements do not constitute an adverse effect, and therefore are consistent with this determination of “no adverse effect with conditions”.
- If the signatory parties cannot confirm the no adverse effect determination, they will consult with the Trust for a period not to exceed 15 calendar days to resolve and maintain the no adverse effect with conditions determination.
- If, after the steps identified in Section I are taken, the signatory parties fail to reach agreement on any of the above items, any signatory party may raise a dispute under Section IX (Dispute Resolution) of the PTPA. The entire undertaking will be the subject of dispute and The Trust shall stop work on the disputed portion of the undertaking until the dispute is resolved. Work on project elements that are not the subject of dispute may proceed.

Section II: Verification of Design Approach Agreed upon During Consultation

- The Trust will provide full-size, select pages of the 50% Construction Document (CD) set for buildings, structures, and landscape to the signatory parties to provide review, and consultation if necessary, on the earlier development of the following design elements and verify that they are consistent with the design approach as discussed during the consultation process (see Exhibit A). The design elements to be reviewed and verified through this process are as follows:
PRESIDIO TUNNEL TOPS
ENVIRONMENTAL ASSESSMENT

- Translucent Seating (Exhibit B)
- Translucent landscape between Lincoln Boulevard, the Visitor Center (210) and the Western Hollow (Exhibit C)
- Pavement modification at the Outdoor Use Area west of building 201 (Exhibit D)
- Repairs and modification of the glazed canopy on the northeast elevation of 603 (Exhibit E)
- Windows, siding and entry of new building 601 (Exhibit F)
- Lowering landscape/ Mason Street edge condition, berms and tree eliminations (Exhibit G)
- Lowered height of the Central Overlook (Exhibit H)
- Path modifications (Exhibit I)
- Reduced CVY courtyard canopy (Exhibit J)
- Enhanced planting on east elevation of building 602 (Exhibit K)

Within 15 calendar days of receipt of the 50% CD set, signatory parties will return comments to the Trust confirming that the drawings reflect the design approach agreed upon during the consultation and therefore are consistent with the determination of "no adverse effect with conditions".

If the signatory parties cannot confirm that the drawings reflect the design approach, they will consult with the Trust for a period not to exceed 15 calendar days on these elements.

If, after these steps, the signatory parties fail to reach agreement on any of the above items, any signatory party may raise a dispute under Stipulation IX (Dispute Resolution) of the PTUA. The entire undertaking will be the subject of dispute and the Trust shall stop work on the disputed portion of the undertaking until the dispute is resolved. Work on project elements that are not the subject of dispute may proceed.

Integral Color Concrete Sample
- The Trust will provide each of the signatory parties with a sample of the integral color concrete for wall elements (dark gray) to confirm that this approach is consistent with the concrete color palette described in Exhibit A.
- Signatory parties may respond in 15 calendar days with any comments or questions on the color sample.

Final Drawing Set
- The Trust will provide the signatory parties with an electronic version of the 100% CD for buildings, structures, and landscape set as a record of final project conditions.

Section III: Rehabilitation of Building 201
- The Trust will review the rehabilitation and/or tenant improvement scope for building 201 as a separate undertaking under Stipulation IV.C.1 of the PTUA when it receives a proposal. The Trust will notify signatory parties via electronic mail when design for a specific proposal commences.

General Provisions