

June 20, 2008

Dear Friends and Colleagues,

You may have heard that the Presidio Trust has proposed a major revision to the Management Plan for the Presidio Main Post, the area of the park that contains the archaeological site of the Spanish-colonial Presidio de San Francisco. I am writing to alert you that this revised Presidio Trust Management Plan (PTMP), if adopted, could pose serious threats to the integrity, research potential, and public interpretation of the Spanish colonial archaeological site of El Presidio de San Francisco, and to the Presidio of San Francisco National Historic Landmark District.

Between now and July 31st, we are in a critical window when members of the public can provide input on the revised Presidio Trust Management Plan (PTMP) through comments to a Draft Supplemental Environmental Impact Statement (SEIS). If you share my concerns about preserving the historical and archaeological resources of the Presidio of San Francisco for generations to come, I hope you will join me in expressing those concerns to the Presidio Trust.

There are two things you can do:

1) As soon as possible, email the Presidio Trust (mainpost@presidiotrust.gov) and the State Historic Preservation Officer (mwdonaldson@parks.ca.gov) and ask that the July 31 public comment deadline be extended.

This is important to allow sufficient time for individuals and organizations to prepare detailed comments, especially since many of the technical and policy documents referenced in the SEIS can only be reviewed by travelling in person to the Presidio Trust library. Additionally, the Draft Assessment of Effects, in which the Presidio Trust will be required to list the specific historic properties that would be impacted by the proposed developments, has not yet been prepared. It is impossible to meaningfully comment on the revised PTMP and the Draft SEIS without this document being available.

2) Participate in the public comment process by expressing your own opinions about the revised PTMP and the Draft SEIS, which evaluates several alternatives to proposed developments. Following this letter, I have listed some key points to be considered in evaluating the revised PTMP and the Draft SEIS.

The environmental planning documents can be reviewed on the Presidio Trust website: <http://www.presidio.gov/trust/projects/mp/mpdocs.htm>

A public hearing will be held on July 14, 2008 at 6:30pm at the Officers' Club, 50 Moraga Ave.

Public comments can be emailed to mainpost@presidiotrust.gov or mailed to: Main Post, Compliance Manager, Presidio Trust, P.O. Box 29052, San Francisco CA 94129-0052

Many thanks,

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Presidio of San Francisco Main Post Background

The Main Post is the historic heart of the Presidio of San Francisco. It contains the archaeological remains of El Presidio de San Francisco, a Spanish-colonial settlement founded in 1776. El Presidio is the oldest non-native settlement site in the San Francisco Bay Area. The site is important not only for its historical importance in local history but also because of its international significance as one of the major nodes of European colonization in the Pacific Rim. El Presidio de San Francisco was the basis for the designation of the Presidio as a National Historic Landmark District in 1963.

The site of El Presidio de San Francisco has been the subject of archaeological investigations since its discovery in 1993. Amazingly, the site is extremely well-preserved despite the 19th and 20th century U.S. military use of the Main Post. Along with the Spanish-colonial and Mexican era archaeological remains, the site also includes well-preserved archaeological deposits from the early U.S. military occupation of the Main Post from 1847 onward.

Today, the site is being researched and interpreted under the direction of the Presidio Archaeology Center, a joint facility of the Presidio Trust and the National Park Service that coordinates a network of researchers including federal archaeologists, cultural resource management firms, and professors and students from Stanford University, University of California Berkeley, Sonoma State University, Santa Clara University, Cabrillo College, San Francisco State University, and Mills College.

Proposed New Development

It is ironic, and disturbing, that the biggest threat to this important archaeological site should come from the Presidio Trust, the Federal agency that is charged with preserving the significance of the Presidio of San Francisco National Historic Park.

The proposed alterations to the Presidio Trust Management Plan are described as “Alternative 2” in the Supplemental Environmental Impact Statement. In a sharp departure from the original Management Plan, which prioritized historical preservation and interpretation in the Main Post, the revised Management Plan would allow three massive construction projects to go forward. These are:

1) Contemporary Art Museum. A 100,000 square foot museum at Sheridan and Anza, presently designed as a “sleek, modern glass building” (SF Chronicle, 6/9/08).

2) Hotel Construction. A 95,000 square foot hotel constructed along Graham Street in the main post.

3) Theater Expansion. The Presidio Theater (Bldg 99) would be expanded through construction of a 20,000 square foot addition, an area over three times its current footprint.

Several existing buildings, totaling 145,000 square feet, would be demolished to make way for the new construction and to open up green spaces and vistas in the Main Post.

The cumulative effect of these new developments is that 20% of the Main Post’s built environment would be new construction. In addition to the buildings themselves, these new facilities will require substantial above-ground and below-ground utilities and other infrastructure and landscaping, which can be as damaging to archaeological deposits as other kinds of construction.

PRELIMINARY CONSIDERATIONS IN RESPONDING TO THE MAIN POST UPDATE OF THE PRESIDIO TRUST MANAGEMENT PLAN AND THE DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

1) The Presidio Trust should be commended for recommending that the Presidio Archaeology Center be relocated to the Main Post.

This is the kind of programming that is appropriate for the Main Post. In its new proposed location, the Presidio Archaeology Center will be more accessible to the public and to researchers. The Archaeology Center program should be strengthened with specific funding commitments. The Presidio Trust should commit to preserving the Main Post’s archaeological resources as a management priority.

2) The focus of planning for the Main Post should be to enhance, research, and interpret the historical resources that contribute to the Presidio of San Francisco National Historic Landmark District.

The Presidio of San Francisco is a National Historic Landmark District, which affords the highest level of protection accorded to any historic site in the United States. Government agencies like the Presidio Trust are charged with protecting, rather than damaging, designated National Historic Landmarks.

The Presidio Trust argues that the proposed new development is ok because it will “express the spirit of innovation that is synonymous with San Francisco and the Bay Area.” (Draft Main Post Update of the PTMP, June 2008, Pg. 3). This is dangerous logic. National Historic Landmarks are meant to be islands of historic preservation in a vast sea of modern development, places where the physical remains of the past are preserved for the public. If the Presidio Trust’s new plan is allowed to go through, it sets a dangerous precedent in which “innovation” can be used as a justification for destroying historic landmarks.

3) New construction will degrade the integrity of the Presidio of San Francisco National Historic Landmark District, and by the Presidio Trust's own account, will result in adverse affects to known significant Spanish-colonial and American period archaeological resources.

New construction, especially the proposed museum, would dwarf the historic site of El Presidio de San Francisco and degrade the integrity of the Historic Landmark District. The sum total of new construction would mean that 20% of the built space in the Main Post would be non-historic.

Archaeological testing conducted by independent consulting firms over the past six months has confirmed that the locations scheduled for the Contemporary Art Museum and the Presidio Lodge contain significant Spanish-colonial and American period deposits that will be adversely affected by the proposed construction.

These adverse impacts are unnecessary. There are many locations in the Presidio of San Francisco where a contemporary art museum could be constructed without damaging either the National Historic Landmark District or the archaeological resources. There are several vacant buildings in the Main Post, including Bldg 42, which could be restored for visitor's lodging.

4) Preserve the El Presidio de San Francisco Archaeological Site for Public Interpretation and Research:

No Parking Lots or Vehicle Traffic through the El Presidio Site!!!!

The Presidio Trust's own archaeological management plan, Levantar, calls for all parking and vehicular traffic to be eliminated from the site of El Presidio de San Francisco. But the new revised Presidio Trust Management Plan would use Graham Street as the main vehicular traffic pathway to the proposed museum, and would also use the northeast portion of the archaeological site as a public parking lot. This will make it impossible to meaningfully implement the public interpretation and research designs that are described in the draft SEIS as mitigation measures for adverse effects.

5) The Draft SEIS omits several documents that are necessary to assess the potential impact of the proposed alternatives to archaeological resources in the Main Post.

Archaeologists and historic preservation groups had been assured that the Presidio Trust would include necessary technical and policy documents in the draft SEIS, and that those documents would be available for public inspection and comment. However, a few weeks before the release of the draft SEIS, the Presidio Trust decided to omit these documents from the publically-distributed draft SEIS.

The first document is the Draft Finding of Effect that the Presidio Trust is required to produce to comply with the National Historic Preservation Act. This document is required to list all the historic properties that will be affected by the proposed changes to the PTMP, and by the alternatives being considered in the SEIS. Without this document, it is impossible to compare the effects of the proposed changes and alternatives.

The second group are documents that outline Presidio Trust research and management policy for the Main Post's archaeological resources: the Archaeological Management Plan ("Levantar"); the

Draft National Historic Landmark Update; the Main Post Archaeological Research Design; and the Archaeological Collections Management Policy.

The third group are reports of technical studies undertaken to assess the presence, absence, and integrity of archaeological resources in the areas that will be affected by new construction. These include a “Cut/Fill Map 1871-2000” and three draft letter reports submitted to the Presidio Trust in 2008 by archaeological consultants Phillip Kajankoski, Michael Meyers, and Eleanor Reese.

Ø Ask the Presidio Trust to extend the Draft SEIS comment period until after the Draft Finding of Effect has been released and circulated for public and agency review.

Ø Ask the Presidio Trust to release archaeology policy and management documents and technical reports to the public through their website. Ask the Presidio Trust why so many archaeological management documents are still “drafts” that have not been circulated for agency review or peer comment; and why none of these documents have been formally adopted as policy by the Presidio Trust.

6) The Draft EIS does not use the best evidence available to assess the impacts of proposed construction on archaeological resources.

Both the draft PTMP and the Draft SEIS contain factual errors with regard to archaeological resources. These documents rely primarily on a 1993 National Historic Landmark update that was written before archaeological research had begun at the Presidio of San Francisco. The result is that known archaeological deposits and features that will be affected by the proposed museum and hotel are not disclosed to the public. For example, the map on pg. 160 of the Draft Supplemental EIS omits the locations of known Spanish colonial deposits located within the construction area of the proposed museum and proposed hotel. The result, intentional or not, is that the draft PTMP and the Draft SEIS conceal the true impact of the proposed development on archaeological sites.

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