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January 31, 2022

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Reference: 2021 Annual Report on Activities under the 2014 Presidio Trust Programmatic Agreement, the Presidio of San Francisco National Historic Landmark District, San Francisco, California

Pursuant to Stipulation XIV of the Presidio Trust Programmatic Agreement (PTPA, 2014), enclosed is the 2021 Annual Report of activities conducted under that Programmatic Agreement.

After a very challenging 2020, the Presidio Trust emerged at the end of 2021 with an improving financial situation and much to look forward to in the year ahead. We are especially enthusiastic about the imminent debut of nearly 25 acres of newly rehabilitated landscape on the park's northern edge this spring, with the arrival of Tunnel Tops and Battery Bluff in early 2022. What's more, the Trust will begin work this spring on one of the Presidio's largest remaining unrehabilitated building complexes – the East Mason Warehouses. With these projects in the pipeline, our post-pandemic outlook remains positive, and we look forward to our continued collaboration in the months ahead.

The enclosed report documents all compliance decisions, including Appendix A, administrative and full reviews for the calendar year 2021. Between January and December 2021, 38 projects were reviewed by Trust preservation professionals through Stipulation IV of the PA (commonly referred to as the “N²” process). Of these, 35 were reviewed at the administrative level and three at the full level of review. The Trust also reviewed more than 400 “repetitive or low impact activities” through Appendix A of the PA. Appendix A includes actions such as routine landscape maintenance, historic residential unit turns, and other such low impact activities.

The N² team that participates in the agency’s project review process is currently comprised of six preservation professionals that meet the Secretary of Interior’s standards for Archaeology, Historic Architecture, and Architectural History. The group of historic preservation staff regularly involved in full N² reviews in 2021 is composed of historical landscape architect Michael Lamb; archaeologists Kari Jones, Edward DeHaro, and Georgie DeAntoni; Federal Preservation Officer Rob Thomson and Historic Compliance Coordinator Megan Borthwick. Curator Liz Melicker was on family leave for most of 2021; her role was supplemented by temporary hire Ashley Saeturn, who has ably managed the Trust’s collections and exhibition programs in Liz’s absence. The Trust lost an organizational institution in August, with the retirement of historical architect Rob Wallace, following 30 years of combined service to the NPS and Presidio Trust. We will greatly miss Rob’s experience, expertise, and dedication to the Presidio’s historic buildings, and wish him well in his retirement. His shoes will be too big to fill in the near term, so we will report on how the agency’s historic architecture and project management group will re-staff in next year’s report. As was the case last year, historic compliance staff adapted our remote work practices to maintain close collaboration with the Trust’s operations and maintenance crews, many of whom remained working in the park daily throughout the pandemic. These crews are composed of seasoned tradespeople, trained in preservation maintenance practice, and in many cases have years of experience working with historic resources at the Presidio.

With the conclusion of major roadway construction on the Doyle Drive/Presidio Parkway project in 2018, the enduring working relationship between the Trust, Caltrans, National Park Service, and San Francisco County Transportation Authority cultural resource staff under the Doyle Drive PA wound down in 2019. 2021 witnessed the completion of the Girard Road entry to the park, the Presidio Promenade along Lincoln Boulevard, and roadway-adjacent landscape areas throughout the freeway corridor. The Battery Bluff trails, picnic areas, and cultural landscape rehabilitation work, along with Cavalry Bowl grading, planting, and trails construction were a focus of activity in 2021. The Trust led a supplemental conservation project for historic Batteries Baldwin, Sherwood, Slaughter, and Blaney within their namesake Battery Bluff landscape, which will result in cleaned, stabilized, and interpreted historic resources to complement the new visitor amenities. All remaining Doyle Drive-related project work will conclude in the first half of 2022, marking the final chapter of a decade-plus of successful interagency collaboration.

At the junction of the Main Post and Crissy Field, the Tunnel Tops project neared completion as 2021 came to a close. Over the course of last year, final soils were placed, overlooks and flatwork poured, new buildings constructed adjacent to historic Building 603, and plantings installed in the 14-acre site. The final compliance obligation to deliver a 100% CD record set of final project

conditions is expected in the first quarter of 2022, and the area is scheduled to open to the public in the spring.

The Trust's response to the ongoing pandemic stretched across 2021, with a focus on continuation of the successful "Slow Streets" program. The program limits vehicular access to a network of the park's historic roadways, encouraging safe, socially distanced walking and biking. The Trust's Transportation Department is currently conducting public outreach to determine which aspects of the Slow Streets program should continue; any changes to the program will be subject to future review under the Trust's PA. During the last three months of 2021 the Trust reopened the Heritage Gallery in the Officers' Club on a 1-day-per-week trial basis, which we will re-evaluate later in 2022. On June 1 the City & County of San Francisco closed the temporary Alternate Care Site (ACS), housed in historic Gorgas Avenue warehouses (Buildings 1163/1167) since the fall of 2020. This site was to have been used primarily to care for non-Coronavirus patients, freeing up space in the event San Francisco's hospitals reach or exceed capacity – a possibility that fortunately never came. The financial implications of the Coronavirus pandemic continued to reverberate across the Trust's leasing and building management activities over the course of the year. The agency completed minor base building work at its former headquarters, Building 103 (Barracks 1896), along with sibling Building 101, so that they may be leased out as multi-tenant offices.

Looking ahead, the agency completed reviews and design work for one of the larger rehabilitation projects in recent years: the East Mason Warehouses. Comprising nearly 90,000 sq/ft of space, the US Army constructed the seven-building warehouse complex in 1917 and 1919 in the northeastern corner of the post, adjacent to the Marina Gate. This project will prepare the vacant buildings and associated site for office/commercial occupancy by one or multiple tenants. The design approach will result in fully rehabilitated and structurally upgraded "warm shell" buildings with common service cores and fully upgraded systems. The buildings will take advantage of the 200-space parking lot constructed by the Doyle Drive/Presidio Parkway project, and proximity to the East Beach bayfront access and Quartermaster Reach trails. Construction is expected to begin in the spring of 2022, with completion and occupancy later in 2023.

Trust crews focused on addressing deferred maintenance for buildings, landscapes and other critical facilities across the park in 2021. The agency structurally upgraded NHL-contributing Building 107, an unreinforced masonry electrical substation built in 1911, while also addressing code deficiencies and upgrading the equipment. Trust forestry crews planted nearly 500 redwood, pine, and Monterrey cypress trees within approximately four acres of the Presidio's historic forest in 2021 as part of the ongoing renewal of the NHL's largest landscape feature. Presidio tenants remained active and collaborative partners in the adaptive reuse of historic buildings and landscapes, leading multiple small-scale tenant improvements throughout the park. Long-time tenant the San Francisco Bay School expanded into neighboring Building 36, an 1880 barracks, completing structural upgrades and other alterations to accommodate classroom use. The Trust's new hospitality master tenant upgraded bathroom facilities in the historic Golden Gate Club (NCO Club, 1948) and the patio at the Log Cabin (NCO Club, 1937) in preparation for welcoming special events back to these long-time venues. In preparation for staff returning to work in the office this year, Tides, the master tenant in historic Buildings 1012-1014 (Letterman General Hospital Wards, 1924-1933), completed multiple kitchenette and bathroom updates within their complex in collaboration with the Trust.

The Trust's archaeology team worked with the agency's construction management staff and cultural resource consultants to support several projects within the Presidio in 2021. One Archaeological Management Assessment (AMA) was prepared for the East Mason Warehouse Rehabilitation Project. An Archaeological Management Assessment and Monitoring Plan was prepared for the Verizon Cell Site 27 A-D Project (both enclosed). No Archaeological Identification Plans (AIPs) were issued in 2021. Archaeology staff directly provided field support for thirty projects in the Presidio in 2021, including construction activity associated with the Doyle Drive Phase III landscaping, Tunnel Tops, and several tenant improvements projects. Archaeological research resumed in June 2021, after public health conditions allowed. Research focused on El Presidio de San Francisco, the Spanish-colonial archaeological site at Pershing Square in the Main Post. Excavation focused on an area where Spanish and Mexican adobe structures were repurposed by the US Army until their eventual demolition in 1906. Investigations were conducted by Trust archaeology staff and volunteers who assisted in field and laboratory processing. Seventy-seven volunteers contributed more than 2,200 hours to the project. A full report of the research excavations is underway and will be completed in early 2022. All archaeological material recovered from the Presidio is permanently curated in the on-site federal curation facility, which meets the requirements of a curation facility as described in 36 CFR Part 79 – Curation of Federally-Owned and Administered Archeological Collections.

In 2021, due to the pandemic, collections management, preservation, and use activities were largely conducted remotely. Notable management and preservation activities included rectifying database records through quality control initiatives, planning for the migration of the collections database server, and initiating comprehensive planning for long-term collections management needs, including staffing, storage, preservation, accessibility, and core document revision. In 2021, the Trust's archaeological collections were used internally and externally for exhibition, teaching, public interpretation, scientific analysis, and scholarly research. Exhibitions at the Presidio Officers' Club and Presidio Archaeology Lab Gallery, developed and managed by the Trust, showcased the agency's archaeological collections as well as collections on loan. Renewed loan agreements between the Trust and the National Japanese American Historical Society (NJAHS) supported the special exhibition at the Officers' Club, *EXCLUSION: The Presidio's Role in World War II Japanese American Incarceration*. The Trust's robust loans program supported these exhibitions, as well as outgoing loans and research inquiries concerning Presidio collections. This work enriched a diverse range of research projects at the University of New Mexico, the San Diego Presidio, the Arizona State Museum at the University of Arizona, UC Berkeley, and the Università di Genova in Genoa, Italy.

Our opportunities for professional development remained limited last year due to the public health situation and organizational transitions. The Compliance team focused principally on internal training and process development in support of our new Planning Review process, which integrates the agency's N2, Design Review, and Permitting functions. With the onboarding of new staff in 2022 we look forward to creating and delivering training activities around best practices for cultural resources management at the Presidio. We'll report back on the results of these in next year's report.

The Presidio Trust thanks each of you for your support and collaboration in 2021, and we are eager to welcome you for a visit to the park as soon as conditions allow. If you have any questions about this report or our program, please contact me at rthomson@presidiotrust.gov; I am working remotely for the foreseeable future, so email will be the best way to contact me. A copy of this annual report has been placed on the Trust's website where interested persons and members of the public may access the report and provide comment.

Sincerely,

A handwritten signature in black ink that reads "R Thomson". The signature is written in a cursive style with a long horizontal stroke at the end.

Rob Thomson
Federal Preservation Officer, Presidio Trust



Presidio
Trust

Cultural Resource Management 2021 Annual Report

Report on Activities under the 2014 Presidio Trust Programmatic Agreement, the Presidio of San Francisco
National Historic Landmark District, San Francisco, California

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1 The Presidio Trust N² Review Process

1.1 NEPA and NHPA Compliance

The Presidio Trust manages and maintains Area B of the Presidio of San Francisco, a component of the Golden Gate National Recreation Area and a designated National Historic Landmark District. As a federal agency, the Trust combines its National Environmental Policy Act (NEPA) and National Historic Preservation Act (NHPA) Section 106 review requirements into a streamlined review process referred to as the N² Process.

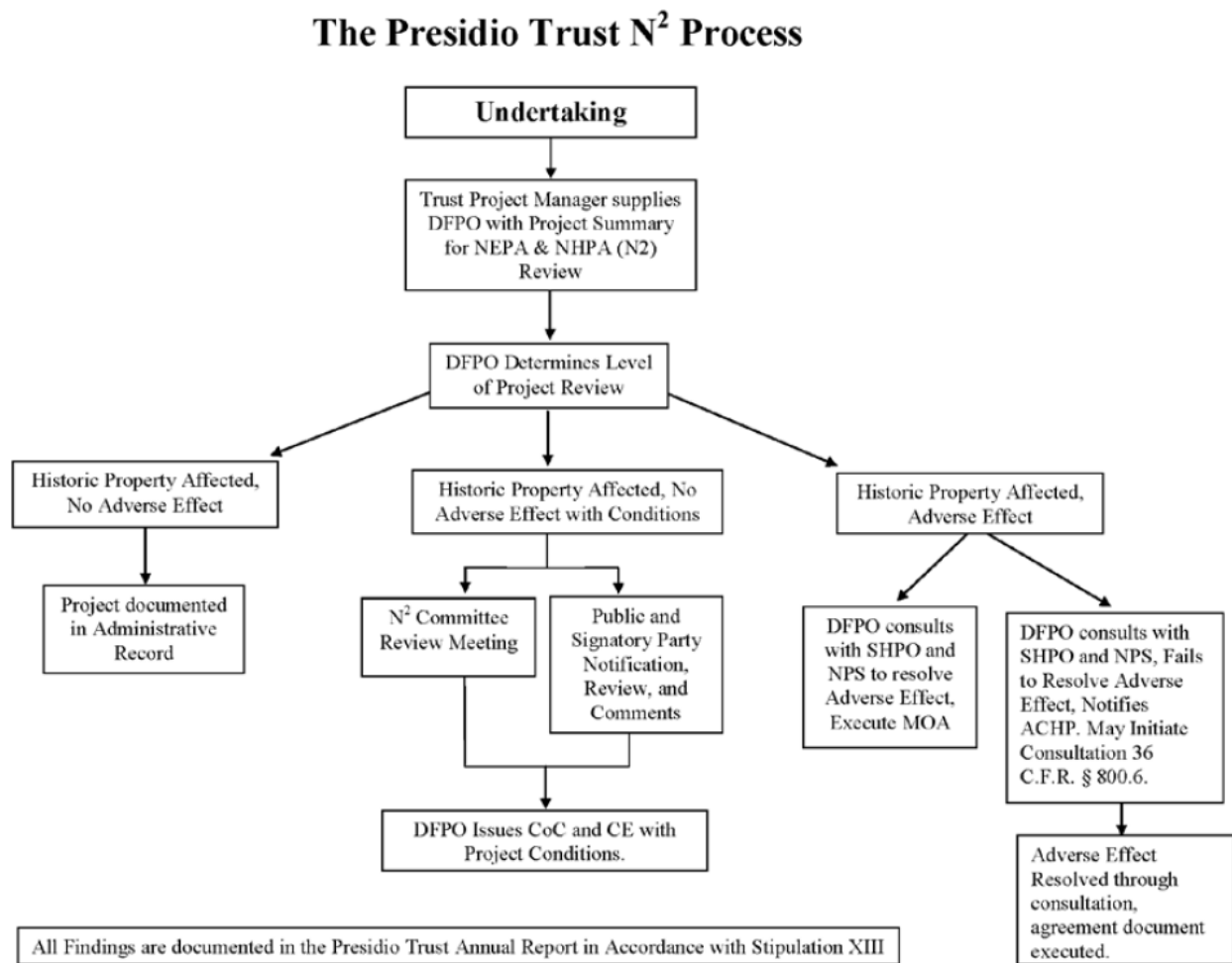


FIGURE 1 N2 PROCESS

The Presidio Trust considers environmental factors and concerns in its decision-making process within the requirements set forth in the NEPA, the Council on Environmental Quality (CEQ) Regulations (40 C.F.R. 1500-1508) (2020), and its own regulations implementing NEPA (36 CFR 1010). To meet its NHPA Section 106 requirements in accordance with implementing regulations (36 CFR Part 800), the Trust follows its 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 (PA, See Appendix A).

All undertakings under the direct or indirect jurisdiction of the Trust are subject to review under Stipulation IV of the PA. Stipulation IV describes how the Trust initiates, assesses, consults, and resolves all undertakings in Area B of the Presidio. Trust Project Managers and/or Trust Designated Representatives are required to submit all proposed undertakings to the Planning and Compliance Department. Based on the information provided and criteria under Stipulation IV, the NEPA/NHPA compliance team completes the appropriate level of review.

1.2 N² Project Screening Form

The Project Screening Form (Appendix B) is available to all Trust staff on the Planning and Compliance SharePoint page, on the Trust's internal web site. The Trust N² compliance team uses the screening form for pre-review consultation, which helps to identify the potential for environmental impacts and adverse effects to a historic property (or properties) that may result from proposed activities. Projects reviewed by the N² team are those that are anticipated to receive a Categorical Exclusion (CE) and a Certificate of Compliance (CC), which certify that there will not be an adverse effect to historic resources and that environmental impacts will not be significant.

Upon receipt of a project proposal, the Historic Compliance Coordinator reviews the project proposal to determine the level of review required. Often, consultation with only one or two resource specialists is required to certify that resources will not be negatively affected. This level of review is known as "administrative review." (Stipulation IV.C.1.f.i.) Complex or multi-phase projects (such as building rehabilitations) require full N² committee review. (Stipulation IV.C.1.f.ii.) An N² submittal includes digital copies of the screening form, along with attachments (usually drawings or maps), which must be submitted one week prior to the meeting.

Project managers are required to fill out a Project Screening Form for any activity that is subject to N² review (based on the criteria described above). The intent is to provide the resource specialists tasked with reviewing projects for NEPA and NHPA compliance with detailed information about project proposals prior to the N² review meeting. The form has seven information sections and 20 questions that address whether the potential for environmental impact or potential for adverse effect to historic property exists. The first part of the Project Screening Form summarizes specific project details, while the second part identifies potential effects. Part 2 of the screening form requires details about project-specific potential impacts on a wide range of resources, ranging from historic buildings to native plant communities.

1.3 N² Meeting

Project managers may use the weekly N² meeting to 1) review their project at the scoping stage to assist them in completing the proper documentation or, 2) present their project to the N² team for comments on projects requiring a planning record and compliance documentation. N² Meetings are held every Thursday at 10am (when projects have been proposed), and agendas are distributed electronically to team members, PA parties and presenters in advance of the meeting. Members of the signatory parties to the PTPA may attend project review meetings and comment on projects under review.

In 2021, the Presidio Trust N² Review Team was comprised of the following resource specialists:

Compliance

Federal Preservation Officer (FPO): Rob Thomson
Historic Compliance Coordinator: Megan Borthwick
NEPA Compliance Manager: John Pelka

Legal Division

Senior Deputy General Counsel: Genevieve Coyle

Building & Landscape Stewardship

Director of Landscape Stewardship: Eric Love
Associate Director of Natural Resources: Lew Stringer
Supervisory Natural Resources Management Specialist: Brian Hildebidle
Forester: Blake Troxel/Acting Forester: Steve Duffy
Integrated Pest Management Specialist: Christa Conforti
Wildlife Ecologist: Jonathan Young

Park Development and Visitor Engagement

Associate Director of Building and Landscape Rehabilitation: Genevieve Bantle
Associate Director of Building Rehabilitation: Rob Wallace
Historic Landscape Architect/Cultural Landscape Specialist: Michael Lamb
Associate Director of Infrastructure Management: Vacant, pending staff replacement
Environmental Remediation Project Manager: Nina Larssen
Director of Planning and Compliance: Prakash Pinto
Transportation Manager: Amy Marshall
Transportation Engineer: Matt Starkey
Archeologist: Kari Jones
Archaeological Specialists: Edward De Haro, GeorgeAnn DeAntoni

Following a full-review N² meeting, Trust compliance staff will document meeting minutes and conditions required to support a Categorical Exclusion and Certificate of Compliance, and circulate draft minutes to the N² team, along with signatory parties via electronic mail for comment or questions. The minutes and conditions will reflect input from the FPO and qualified Trust staff, as well as comments received from signatory parties or the public. Within five business days following circulation of the meeting minutes and project conditions, final minutes will be distributed, and the Certificate of Compliance and Categorical Exclusion will be executed for inclusion in the undertaking's administrative record.

1.4 Categorical Exclusion

The Categorical Exclusion Form is issued to the project manager as evidence of compliance with NEPA but is not considered complete until all the conditions (for the purpose of avoiding any environmental impact) are met. A Categorical Exclusion is considered complete when all project conditions are signed off by the applicable team specialist or their designee. This documentation is generally required before the project is eligible to receive Trust-issued permits and proceed with implementation. Some conditions apply to the construction period and are monitored and certified after permitting.

1.5 Certificate of Compliance

The Certificate of Compliance is issued to the project manager as documentation that a project will not have an adverse effect to any historic properties in the National Historic Landmark District (NHLD) or the NHLD itself. The Federal Preservation Officer, with input from the specialists on the N² review team can determine that a project 1) has no effect, 2) has no adverse effect or 3) has no adverse effect with stipulations. Stipulations constitute detailed requirements that will, when implemented, ensure that the project avoids any adverse effect(s) to historic properties. Stipulations must generally be met prior to implementation, unless specifically documented otherwise. The Historic Compliance Coordinator often continues correspondence with project managers in order to document that stipulations are followed. A Certificate of Compliance is considered complete once all stipulations are signed off by the project manager, and it is returned to the compliance department. Documentation of a completed Certificate of Compliance or administrative approval is required prior to project implementation and receiving permits from the Presidio Trust Permitting Department.

All projects that receive Certificates of Compliance/Categorical Exclusions are posted to the Trust's publicly accessible online database, available via its website (<http://www.presidio.gov/presidio-trust/planning/Pages/categorical-exclusions.aspx>).

2 Projects Reviewed under Stipulation IV in 2021

Stipulation IV of the PA describes how undertakings are reviewed at the Trust including repetitive low impact activities, administrative level reviews, projects requiring an EA or EIS, Tax Credit Projects, and other projects that fall outside of these categories. This section documents projects reviewed under Stipulation IV, categorized by Trust directed projects and tenant directed projects, with sub-headings describing project type.

2.1 Trust Directed Projects

2.1.1 COVID - 19 Response

Modifications to West Pacific Slow Street (21-034)

Since June 2020, West Pacific Avenue from Arguello Boulevard to Presidio Boulevard has been closed to all but emergency access vehicles as part of the Presidio Slow Streets program (project 20-041). The closure was intended to provide more space to walk, run, and bike safely during shelter in place. The program is consistent with the City's measures to create a network of Slow Streets throughout San Francisco. As we move into reopening, this project will modify the roadway to allow access to limited parking near the Presidio Wall ball field. While this change is temporary, the final road configuration will be determined after further study, evaluation and outreach.

Revisions to COVID-19 Emergency Order/Continuation of Slow Streets (21-036)

This Order further revises public use limits and closures that are consistent with the City and County of San Francisco's (CCSF) effective orders, as well as Federal guidance and directives, to reduce COVID-19 risk. The Order includes placing certain safety requirements on individuals, including masking

requirements in some settings. The Order also authorizes the Presidio Slow Streets program (project 20-041) to continue for 120 days from the effective date of the Order. The program was launched during the early stages of the COVID-19 pandemic, as a companion to the CCSF's Slow Streets program, to create more space for visitors to walk, run and bike safely in the park during the COVID-19 shelter in place order. As COVID-19 restrictions are lifted, access and space needs for park visitors, residents and employees are evolving. The Presidio Slow Streets have become widely used to enjoy the park and could provide additional recreation opportunities with further study. The extension will give the Trust additional time to evaluate the Presidio Slow Streets corridors and determine recommendations for a post-pandemic future.

2.1.2 Rehabilitation and Tenant Improvements

Historic Batteries Stabilization & Repair at Battery Bluff (21-018)

The Trust will undertake a stabilization and repair program for four NHL contributing batteries in order to slow deterioration, address public safety, repair structural failures, and remove graffiti in anticipation of opening the Battery Bluff area to the public in the Fall of 2021. Subject properties are Battery Sherwood (1900), Battery Slaughter (1899), Battery Blaney (1903), and the Battery Slaughter Sighting Station (1899). Project scope includes: structural crack repairs, removal of failed walkway features at Battery Sherwood, repair of minor spalls/trip hazards, treatment of ferrous metals, securing and ventilating interior spaces, removal of graffiti and application of an anti graffiti coating, and an engineered repair of the Sighting Station. Work will be guided by a multi-phase treatment plan prepared for the Trust by conservation firm ARG (April 2020) and will be performed in coordination with and under contracts for the Doyle Drive Phase 3B landscape work in the area. Treatments were prepared by qualified conservation professionals to avoid adverse effects to the batteries and associated landscape features, and to facilitate future repair and restoration phases of work (not yet funded).



FIGURE 2: BATTERY SHERWOOD BEFORE (LEFT) AND AFTER (RIGHT) CONSERVATION TREATMENTS & GRAFFITI REMOVAL

Buildings 101 and 103 Multi-Tenant Access (21-033)

To facilitate leasing historic Buildings 101 and 103 (Barracks, 1895-1896) as multi-tenant office space, the Trust will alter central stairway access to the 2nd and 3rd floors. The stairway that serves the northern side of the building will serve the 2nd floor and the southern stairway will serve the 3rd floor. The northern stairway will be enclosed from the 3rd floor on the 2nd floor landing and at the 3rd floor by partition walls. The southern staircase will be enclosed from the 2nd floor by a partition. New partitions are designed to be reversible and minimally impactful to these original circulation features so that the stairs and passageways can be reactivated in the future. Work will first be performed at Building 101 followed by 103.

Rehabilitation of East Mason Street Warehouses for Office/Commercial Use (21-042)

The East Mason Street Warehouses (buildings 1182 through 1188) comprise a distinctive row of seven mostly identical structures constructed concurrently in 1917-1919 as a warehouse complex. The NHLDC-contributing buildings, which align with Mason Street at the Marina Gate, have undergone some prior alterations that have added partitions and connections to adjacent buildings to facilitate U.S. Army storage and office uses but retain moderate to high levels of integrity. With the exception of a previous office and warehouse use in two of the buildings, the warehouses have been mostly vacant since 1994 and are in fair condition. This project will fully rehabilitate the buildings and associated site area for office/commercial occupancy by one or multiple tenants, consistent with Trust long range planning objectives, current applicable building standards and market factors. The design approach will result in a fully rehabilitated and structurally upgraded “warm shell” with common core(s) and systems as is typically required by the Trust for code-compliant occupancy for the use types noted. The rehabilitation approach retains all interior and exterior character defining features, and new elements (building systems, common area cores, restrooms, storefront entries, circulation elements, exterior ramps and raised decking) are compatibly designed. New window and skylight openings will re-establish existing openings that were covered over during the U.S. Army era and allow for additional natural light in select areas. Existing historic windows will be retained and repaired. All work will comply with Secretary of Interior Standards for Rehabilitation, Presidio Trust Management Plan planning principles, and project-specific rehabilitation guidelines and treatment recommendations. Building specific tenant improvements (TIs) to follow to accommodate future tenants will be subject to additional environmental review. The site’s vehicular circulation and parking lot (for 210 cars) were previously evaluated and constructed as part of the Presidio Parkway project.



FIGURE 3: MASON WAREHOUSES AERIAL, MARCH 2021 (STEPHAN PARK, PRESIDIO TRUST)

Substation 107 Upgrade (22-002)

Historic building 107 (Substation, 1911), which supplies approximately half of the Presidio’s electrical energy requirements, will be upgraded to meet current industry standards and safety codes. The 4kV switchgear and distribution transformers are beyond their serviceable lifespan and will be replaced. A steel brace system will be installed on the building’s interior to meet seismic requirements. A window at the northwest corner of the building will be enlarged to become a doorway and pushbars will be installed at all exit doors to meet egress requirements. The new doorway will retain the height and width of the historic window, maintaining the historic fenestration pattern.



FIGURE 4: HISTORIC SUBSTATION BUILDING 107, SHOWN HERE IN 1913

2.1.3 Maintenance and Stabilization

Fire Damage Repairs at the Spire Sculpture (21-020)

The Trust will undertake several actions to address public safety concerns and damage caused by the June 23, 2020 fire at Andy Goldsworthy’s Spire sculpture (project 07-045). The actions include removing any loose pieces of bark and wood that currently remain, bolting under capacity trees to adjacent trees with a higher structural capacity so they help support one another, and installing a post and cable fence in the area of the trees surrounding the sculpture to restrict public access to the base of the sculpture. The Spire will continue to remain in place subject to regularly scheduled inspections in accordance with defined protocols to monitor any changes in its structural integrity. The public will be notified of the actions through updated site signage and other announcements.



FIGURE 5: “SPIRE” FOLLOWING REPAIRS AND PUBLIC ACCESS RESTRICTIONS

Red Shingle Standard (21-030)

The Army’s widespread use of red tile and red composition shingle roofs in the Presidio provided architectural uniformity and remains a character-defining feature of most Presidio neighborhoods. Repairing and replacing roofing material is an essential component of maintaining the condition and historic integrity of the Landmark District. As roofing material availability changes over time, the Trust reviews and accepts standards to ensure consistency throughout the park. The previously accepted red shingle standard, Malarkey Alaskan Red, is no longer available. The Design Review Committee evaluated a number of products and identified Owens Corning Spanish Red Shingle as an acceptable alternative. Use of this standard will ensure consistency throughout the park while retaining historic integrity of the resources requiring roofing repair or replacement. The shingle will first be used at Building 1151 and other roofs will follow as necessary.

Boundary Wall (at Lyon and Vallejo) Temporary Stabilization (21-041)

A portion of the Presidio’s historic boundary wall along Lyon and Vallejo Streets collapsed in late 2020 due to soil and vegetation overgrowth. This project will temporarily stabilize the soil slope and remaining historic wall until the wall is permanently repaired. Stabilization consists of constructing a temporary wood retaining wall in the soil section and shoring the remaining portions of the historic wall with 4-foot high wood bracing.

2.1.4 Landscape and Conservation

Accessible Loop/Cemetery Overlook Trail Repairs (21-010)

Within Area B, the 1.75-mile long Accessible Loop includes segments of the Presidio Promenade, Park Trail, Bay Area Ridge Trail and Juan Bautista de Anza Trail. The trail surface consists of either compacted shale, concrete or asphalt surfacing. Some trail segments with compacted shale surfacing have eroded such that the trail surface is rutted and in need of repair. This project will improve accessibility by bringing existing trails, including a short segment of the path to the Cemetery Overlook, back into compliance with the ABA Accessibility Standards (ABAAS) and addressing erosion and other needs along the trails. Work will include trail resurfacing, reconstructing landings, improving surfacing between the trail and concrete bench pads, installing drainage improvements, repairing damaged walls, removing post and cable fencing, and installing flexible posts in designated areas. Construction-period trail closures (partial and complete, depending on the work needed and availability of alternative routes) are anticipated.

Lyon Street Phase IV Reforestation (21-013)

This stand of Eucalyptus borders 3 previous forest restoration sites (projects 11-065, 11-071 and 14-018/15-033) along Lyon Street. Nearly one acre in size, it consists primarily of 50 Blue Gum Eucalyptus trees and 25 Monterey cypress trees with poor structure and vigor. The trees will be replaced with a variety of Eucalyptus species of varying size and stature. Trees will be removed and stumps ground below grade to prevent regrowth and re-sprouting. Wood chips will remain on site to help with erosion control and tree establishment or hauled to the Trust log yard. Compost will be added to the site at a rate of roughly 300-400 yards per acre and erosion control measures and drip irrigation will be installed. Approximately 200 Eucalyptus trees will be planted roughly 15 feet on center and thinned every five years to reach an approximate density of 40-50 trees per acre at maturity.

Lower Kobbe Phase III Reforestation (21-014)

This stand of over-mature and senescent Monterey Cypress trees will be the third phase in the larger Lower Kobbe reforestation (see previous projects 14-028 and 15-034). In early 2021, a wind event blew over several more trees in this stand, which has elevated the concern for this particular area and moved this phase up in priority on the reforestation schedule. Nearly one acre in size, it consists of 30 Monterey Cypress trees, which will be replaced primarily with the same species. Trees will be removed and stumps ground below grade to prevent regrowth and re-sprouting. Wood chips will remain on site to help with erosion control and tree establishment or hauled to the Trust log yard. Compost will be added to the site at a rate of roughly 300-400 yards per acre and erosion control measures and drip irrigation will be installed. Approximately 200 Monterey Cypress trees will be planted roughly 15 feet on center and thinned every five years to reach an approximate density of 40-50 trees per acre at maturity.

Wright Loop Reforestation (21-015)

This nearly one-acre area between Wright Loop and the Kobbe Community Garden currently consists of a mixture of dead trees, exotic Acacia and brush species and ivy, which provides cover for illegal camping. Historically, trees were removed from this location to restore an historic view shed from building 1332. Existing vegetation will be removed and replanted with a mixture of low-lying native species bordering Wright Loop and tapering up to larger woody species including oak, toyon and buckeye and possibly some flowering trees. The project will incorporate some of the design concepts (such as a seating terrace) identified in RHAA's plan for the garden (project 10-015).

Redwood Phase V Reforestation (21-016)

This nearly one-acre stand of over-mature and senescent Monterey Pine mixed with Black Acacia trees will be the fifth phase in the larger redwood reforestation site on Arguello Boulevard from the corner of Thomas Avenue to Washington Boulevard (see previous projects 03-093, 08-035, 09-077 and 11-066). Twenty-five Monterey Pine and 50 Black Acacia trees will be removed and replaced with several redwood varieties and a mixture of native understory species. Trees will be removed and stumps ground below grade to prevent regrowth and re-sprouting. Wood chips will remain on site to help with erosion control and tree establishment or hauled to the Trust log yard. Compost will be added to the site at a rate of roughly 300-400 yards per acre and erosion control measures and drip irrigation will be installed. Trees will be planted roughly 15 feet on center and thinned every five years to reach an approximate density of 40-50 trees per acre at maturity.

Highway 1 Tree Removal (21-024)

Approximately 30 high risk trees (primarily Eucalyptus) border Highway 1 just north of the MacArthur Tunnel entrance. This group of trees has exhibited a history of failure onto the highway at this location, which elevates the risk to property and personnel should environmental conditions cause further trees to fail. Tree removal will require the use of a crane, ground crews, tree crews, and highway traffic control (lane closures or rolling stops) to prevent falling limbs from potentially hitting passing vehicles. All equipment, and logs and debris will be removed from the project site and/or staged at the Trust log yard. Hauling of logs will occur through the Eucalyptus stand east of the highway. Tree protection measures will be employed for trees not removed in accordance with the Trust's tree preservation specifications. Work may be performed during weekday evenings after approval of the encroachment permit from CalTrans. The project follows similar tree removal work performed in the area in 2018 (project 18-039).

Building 220 Landscape Rehabilitation (21-043)

The Trust will rehabilitate the landscape of Building 220 (Bakers and Cooks School and Barracks, 1939) to reduce potable water consumption and to reinforce the historic character of the building. Landscaping will emphasize the building's entrance (west façade) and deemphasize the service side (east façade). Work will begin with plantings and irrigation adjustments along Lincoln and Halleck and will later include plantings in west parking lot and along French Court. A concrete walkway will be installed from Lincoln to the existing concrete walk on the south side of the building.

Project LIFEPLAN: A Planetary Inventory of Life (22-003)

The Trust will partner with the California Academy of Sciences at El Polin Spring to contribute to the LIFEPLAN project, based out of the University of Helsinki. The site will be part of a network of 100 designated monitoring sites across the globe to establish the current state of biodiversity. Using low-impact equipment within a 100m by 100m plot, monitoring will include air and soil microbes, flying invertebrates, camera traps and audio recording. Monitoring will begin in early 2022 for the entire year and again in 2024. The equipment will be implemented and maintained by a combination of Trust staff and volunteers. The site will be accessed on foot and all park standard sterilization protocols will be followed. All specimens collected will be shipped to the University of Helsinki for analysis. All specimens will be destroyed for identification purposes. No T&E species will be affected. Temporary interpretative signage will likely be installed onsite. More details of the global project can be found at: <https://www2.helsinki.fi/en/projects/lifeplan>.

2.1.5 Transportation and Utilities

Building 737 Car Charger and Electric Panel Installation (21-012)

As the market for electric vehicles is rapidly expanding, the Trust wishes to accommodate the increasing demand for access to charging equipment. The ability to provide charging as an amenity will also attract and retain highly valued, sustainably-minded tenants. Additionally, more electric vehicles in the park will reduce emissions and improve overall air quality. To accomplish this, the Trust has three car charger and electric panel installation plans known as types A, B, C. As additional chargers are requested, panels will be installed following the three installation plan types. The panels will be installed in locations to minimize visual impacts, penetrations will be the minimum necessary, and mortar joints will be used as much as possible on brick buildings. An electric panel and new meter will be installed at building 737 (Six Car Garage, 1939) following type A installation plan.

2.1.6 Property Management and Visitor Services

Building 39 Lease Management (21-011)

The long-time master lease with the San Francisco Film Centre (tenant) for the operation of historic building 39 (Barracks, 1940) expired in late 2020. The Trust will now assume maintenance and leasing responsibility for the building and will invest in building improvements to attract and make ready for new tenants. Flooring in the first floor event space (Palm Room) and in common areas throughout the building will be repaired. Suites will receive preventative maintenance, repairs and painting.

Fort Scott Parade Ground Live Broadcast Event (21-017)

George P. Johnson (GPJ) will produce a live broadcast keynote speaker event at Fort Scott Parade Ground on March 22, 2021. Set up will begin on March 12 and break down will be completed by March 25, 2021. Generators, satellite trucks, tents, flooring, heaters, bathrooms, stage, and production equipment will be set up on site. Lawn will be protected by plywood and special events will work directly with Natural resources to confirm exact location to avoid impacts to natural resources. Shuttle will be provided to and from parking lots. Restrooms will need to connect to water. Approximately 50 production staff will be on site each day. All appropriate San Francisco Department of Health (SFDH) filming safety precautions will be followed.

SF Fire Department Training at Battery Dynamite (21-019)

The San Francisco Fire Department (SFFD) proposes to use historic Battery Dynamite (1399, built 1894), Coast Artillery Powerhouse (1398, built 1906), non-historic 1397 (Chemical Training building) and adjacent site to conduct on-going training for Confined Space and Trench Rescue. SFFD will practice basic set up of their equipment and scenario type training. The training will be conducted in crawl spaces in the batteries and the area between building 1397 and 1398. SFFD will schedule training days through the Trust's Department of Emergency Services (DES), which will be responsible for notifications to nearby building users. Training will be limited to the area specified in the special use permit; any additional sites proposed for training exercises will require additional permit requests.

My Park Moment Photo Show (21-027)

The Presidio Trust will host a community photo exhibit called "My Park Moment Photo Show" highlighting the opening of Tunnel Tops. Beginning in the Summer of 2021, the exhibit will run for 6 months to a year. Approximately 400 community submitted photos will be printed on vinyl banners and displayed on shipping containers in four locations in the Presidio. Four shipping containers will be located in the Sports Basement (Building 610) parking lot, Mason Street Warehouse (Buildings 1182-1188) parking lot, and the YMCA (Building 63) parking lot. Two shipping containers will be located on

Owen Street between Anza and Graham Streets. The project includes minor site improvements such as curb ramps, crosswalks, and temporary path connections to facilitate universal access. Traffic barriers will be used to create pedestrian-only zones around the shipping containers.

Special Events Standard Operating Procedures (21-029)

The Trust issues special use permits to individuals, organizations or businesses for a variety of organized athletic events, pageants, celebrations, fairs, festivals, public spectator attractions, commercial filming, camping, First Amendment activities and other special uses within Area B. If issued, special use permits include terms and conditions that protect park resources while allowing users to enjoy the park without interfering with other park visitors. These Standard Operating Procedures provide a set of step-by-step instructions to help Visitor Services staff carry out planned events efficiently. The SOPs describe how event scope, size and other factors, such as complexity, potential for impacts, and monitoring requirements are used to evaluate permit requests. New events, events involving natural or protected areas, events generating large crowds, significantly increased noise levels and/or traffic congestion are reviewed by Visitor Services and other staff to determine if further review is required. If so, the Trust's Planning Review process is initiated. All events are discussed with the Visitor Services Manager prior to approvals being granted.

2.2 Tenant Directed Projects

2.2.1 COVID-19 Response

Building 563 Exterior Deck Installation (21-021)

The Presidio Social Club will construct a temporary deck at building 563 (Barracks, 1903) to expand their outdoor dining capacity in response to the challenging COVID-19 environment. The grey and white wood deck will be behind the building between the current patio and tennis court. The deck will be 9 inches high with a 42-inch railing with the posts resting on concrete. No excavation will be required. The deck will conform with existing landscaping. Staff will advise on protecting, removing or restoring any vegetation.

2.2.2 Rehabilitation and Tenant Improvements

Building 35 Bay School Lower Level Tenant Improvement (21-009)

The Bay School of San Francisco (tenant) will make improvements in the lower level theater, corridor and lobby of historic building 35 (Enlisted Men's Barracks & Mess Hall, 1912) to better use the space as a classroom and drama room. Interior alterations of non-historic fixtures and finishes will be made including painting and carpeting, adding five new power receptacles in the theater, relocating and adding fire alarm strobes, adding an interior window and door, adding a partial height sliding door system and other casework in the theater, adding curtains on a sliding track in the theater, and replacing wood guardrail infill panels with tempered glass panels. The improvements will not affect the following fire and life safety systems: occupant load; egress routes, exiting and fire sprinklers.

Building 920 Tenant Improvements (21-022)

The Trust and Camp and King (tenant) will make repairs/improvements to building 920 (Motor Repair Shop, 1921) for new office use. The Trust will remove a non-historic partition wall, carpets and linoleum, and perform preventative maintenance for life safety systems, plumbing and electrical. The tenant will

construct three freestanding enclosed office spaces to replace existing non-historic offices, demolish a non-historic kitchenette, and construct a new kitchenette.

Building 39 Suite 200 PEGC LCC Tenant Improvement (21-023)

Phillips, Erlewine, Given & Carlin LLC (PEGC LLC or tenant), currently leasing office space in suite 201 in building 39 (Barracks, 1940), will make improvements to expand into suite 200. The scope of work includes reconfiguring partition walls, which entails demolishing the existing non-historic partition wall that separates the two suites and constructing new partition walls to create six new enclosed office spaces, and updating an existing non-historic kitchenette within suite 201. Historic finishes and features will be protected and retained.

Building 38 Suite 209 ECB Tenant Improvements (21-025)

Current tenant, Community Equity Builders, will complete tenant improvements upgrading existing office spaces in Building 38 Suite 209 (Barracks 1940). A header and sliding door will be added to create a conference room and reception space. New countertops and cabinetry will be installed. Electrical outlets will be moved to accommodate new layout.

Building 135 Basement Level Women's Restroom TI (21-031)

Wedgewood (hospitality tenant) will reconfigure the women's restroom in the basement of historic building 135 (Golden Gate Club, 1949) to create a new dishwashing space (dish pit) in support of expanded catering services. Non-historic partitions and fixtures will be removed and new appliances and fixtures will be installed. Plumbing and electrical will be reconfigured or upgraded as needed.

Buildings 1012, 1013, 1014 Tides Kitchenettes and Bathrooms Upgrades (21-032)

In preparation for staff returning, Tides, master tenant in historic Buildings 1012-1014 (Letterman General Hospital Wards, 1924-1933), will update a number of kitchenettes and bathrooms. Non-historic kitchenette features in the community kitchen, room 101, will be updated and extended into the existing hallway with installation of partitions and furniture. A new window will be installed where a previous opening has been filled in to visually connect the existing community kitchen space with the new extended section in the hallway. Non-historic kitchenette features in rooms 148, 177, and 241 will be upgraded. Bathrooms in rooms 116A-B, 174, 175, 255, 256, and 257 will also be upgraded. Historic features such as terrazzo flooring, yellow/gold wainscot tile, and marble partitions will be retained and protected where present.

Buildings 1029 and 1030 Landscape Rehabilitation (21-035)

The nearly bare and neglected grounds within the Swords to Plowshares (STP) community campus (non-contributing Buildings 1029 and 1030) stand in stark contrast to the surrounding completed Trust projects and are in need of rehabilitation. The focus of the design will be planting improvements and site furnishings in the central courtyard between the two buildings. The courtyard is a heavily used exterior space for the residents and a gateway for their enjoyment of the Presidio landscape outside the campus. Improvements will include irrigation upgrades, some small expansions/alterations to paved areas, and enhanced planting. The project will also consider the placement of a piece of sculpture near one of the building's entrances subject to additional review and approval.

Buildings 86 and 87 Wallwisher Tenant Improvement (21-037)

Wallwisher, new tenant on the second floor of Buildings 86 and 87 (Barracks, 1862), will complete limited tenant improvements to accommodate their office use. Two non-historic kitchenettes will be

upgraded, a shower will be added to a non-historic bathroom, and non-historic partitions will be removed. Historic windows will be repaired where needed.

Building 36 Bay School Tenant Improvement (21-038)

The San Francisco Bay School (current building 35 tenant) wishes to expand school use into historic building 36 (Barracks, 1885). The project represents a change in occupancy type from office to education, which will require two new structural walls and seismic reinforcement of existing walls. Historic wall finishes will be removed, stored and reinstalled. New office and classroom spaces will be created by removing existing non-historic partition walls and adding two new partition walls. A single-use restroom and two drinking fountains will be installed on the second floor. Non-historic doors will be modified with vision glass for classroom spaces. Mechanical, electrical, and fire protection work is limited to minor relocation and realignments to support the new layout.

Building 103 First Floor North Tenant Improvements, Kinnate, Inc. (21-039)

The Trust has subdivided historic Building 103 (Enlisted Men's Barracks, 1896) to lease as multiple commercial tenant suites. Kinnate, Inc. will lease the first floor, north side of 103 for office use, and has proposed a scope of interior tenant improvements. The scope of work includes new paint and carpet, removal of non-historic Trust office partitions, removal of a non-historic door assembly, office build outs and new work stations, creation of a new board room, addition of acoustic ceiling treatments, and electrical/data upgrades to suit the new office layout. The Trust will install a storefront in the corridor adjacent to the restrooms to create a new entry into the tenant's space. No historic partitions or other character defining features of the space will be altered or removed as part of the TI.

Garage 734 (Stall C) Garage Pod Installation (21-040)

As a business opportunity to respond to an increased need for teleworking space, the tenant in residential building 730A will install a "garage pod" prototype into their stall (C) in historic 6-stall garage 734 (1939). The new product consists of a prefabricated insulated office space that sits on a deck pedestal and features sliding doors on either end, an exhaust fan for ventilation and a camping battery for power. The garage pod is fully removable and requires no alterations, penetrations or exterior work to the garage. Garage door functionality will be retained.

Building 1299 Log Cabin Patio Improvements (21-046)

Hospitality tenant (Wedgewood) will make exterior improvements at historic Building 1299 Log Cabin (NCO Club, 1937) to increase the use of outdoor event space. Wedgewood will remove non-contributing picnic pavilion addition to the rear of the building. A new concrete slab, wood trellis/canopy, and a fence will be installed. This scope includes refurbishing the existing brick barbeque and adding exterior furniture. The exterior electrical system will be reconfigured to meet new layout needs. Tenant will grade, repave, and restripe accessible parking spaces in the existing adjacent lot.

2.2.3 Cell Tower Modifications

AT&T MacArthur Tunnel Wireless Installation (21-026)

AT&T Mobility (AT&T), a personal wireless telecommunications carrier, proposes modifications to its existing base station (cell phone tower) located at the south portal of the MacArthur Tunnel. The modifications will greatly improve cell coverage for visitors and residents of the Presidio, and for people traveling on State Route 1 (Veterans Boulevard or SR-1) through the MacArthur Tunnel. AT&T will remove five existing antennas (one panel antenna above the portal and four antennas on the tunnel entrance) and install 12 antennas (refer to attached photosims). Six antennas will be mounted above the

roadway on the front of the south entrance of the tunnel on a metal ceiling-mounted support at a height of 28 feet above the roadway and would be oriented side-by-side into the tunnel. The other six antennas will be panel antennas mounted on poles in the existing fence enclosure at a height of 11½ feet above ground. A microwave antenna mounted at four feet above ground will remain unchanged. Staging will occur at the top of the tunnel. Existing access and parking along Park Trail will remain. No landscaping is currently proposed. A manlift and SR-1 lane closure (three nights) will be required to install the antennas on the tunnel. An approximate 50-foot trench will be required for an underground utility route from the nearby PG&E transfer station to the AT&T lease area. The proposed operation will comply with prevailing Federal Communications Commission (FCC) standards for limiting human exposure to radio frequency (RF) energy in publicly accessible areas.

Verizon Shafter Road Cell Site Modifications (21-044)

Verizon Wireless (applicant) intends to remove 6 existing antennas on an existing 80-foot tall wireless monopole (project 10-056) and replace these antennas with a newer model of panel antenna that combines the previous and new technologies (5G) for faster and more efficient capacity in the surrounding area. Part of the installation will require replacing and/or adding some of the ancillary equipment within a fenced equipment space abutting the monopole so they are compatible with the new antennas. The modifications will replace outdated technology to secure faster speeds and performance for their network and the direct vicinity of the facility. The unmanned wireless facility is in operation 24 hours a day. The modifications will take place over approximately 21 days with a small equipment staging area abutting the facility. The facility will comply with prevailing Federal Communications Commission (FCC) Radio Frequency (RF) Safety Guidelines.

Verizon Battery Caulfield Cell Site Modifications (21-045)

Verizon Wireless (applicant) intends to remove 6 existing antennas on an existing 130-foot tall lattice tower (project 15-019) and replace these antennas with a newer model of panel antenna that combines the previous and new technologies (5G) for faster and more efficient capacity in the surrounding area. Part of the installation will require replacing and/or adding some of the ancillary equipment within a fenced space beneath the tower so they are compatible with the new antennas. The modifications will replace outdated technology to secure faster speeds and performance for their network and the direct vicinity of the facility. The unmanned wireless facility is in operation 24 hours a day. The modifications will take place over approximately 21 days with a small equipment staging area abutting the facility. The facility will comply with prevailing Federal Communications Commission (FCC) Radio Frequency (RF) Safety Guidelines.

AT&T Armistead Road Cell Tower Modifications (22-001)

AT&T Mobility Services, LLC (applicant) will replace some of its antennas to enhance service and provide 5G technology on an existing 60-foot tall steel monopole (project 09-030) located at their base station on the east side of US Highway 101 about 1,200 feet southeast of the Golden Gate Bridge toll booths near Armistead Road. The work will include moving and replacing 6 antennas on new mounts no less than about 48 feet above ground, replacing 3 remote radio units and adding 3 diplexers at the base of the pole on the ground. The rest of the work, which mainly involves replacing the battery system, will take place in the existing equipment shelter within the fenced enclosure. Due to their mounting location and height, the antennas will not be accessible to unauthorized persons. The facility will comply with Federal Communications Commission (FCC) standards for limiting public exposure to Radio Frequency (RF) energy.

3 Projects Reviewed Under Stipulation IV and Requiring Additional Consultation

3.1 Tunnel Tops

The multi-agency supported landscape project, Tunnel Tops, commenced construction in 2019 under the terms of the project’s determination of “No Adverse Effect with Conditions” (November 2017). Construction slowed in 2020-21, but continued to make progress despite the COVID-19. Safety measures and protocols were put in place to continue construction through calendar year 2021 and toward the home stretch. Tunnel Tops is scheduled to open to the public in Spring 2022. The Trust will submit the final consultation requirement, a 100% CD record set for the project, to Signatory Parties in early 2022.



FIGURE 6: TUNNEL TOPS AERIAL, MARCH 2021 (STEPHAN PARK, PRESIDIO TRUST)



FIGURE 7: TUNNEL TOPS AERIAL PHOTO, DECEMBER 2021

More information about the Tunnel Tops project is available at: <http://www.presidio.gov/tunnel-tops>

4 Agreement Document Updates

4.1 Doyle Drive Replacement

Roadway construction for the Doyle Drive replacement project concluded in 2018 and the Treatment Oversight Panel (TOP) met for the final time in 2019. The Trust completed construction of landscaping at the Girard Road Entrance and plans for the Battery Bluff Multi-Use Trail in 2020.

The Battery Bluff Multi-Use Trail highlights four previously inaccessible Coast Artillery batteries constructed between 1899-1904: Baldwin, Sherwood, Slaughter, and Blaney. Based on recommendations from *Battery Bluff Stabilization and Preservation Treatment Plan* (2020) prepared by Architectural Resources Group Conservation Services (ARG-CS), the Trust initiated stabilization and preservation work on the batteries in coordination with the Doyle Drive landscape project. N2 reviewed the stabilization and preservation work in March 2021 (21-018). The multi-use trail, picnic and landscape areas are expected to open to the public in Spring 2022.



FIGURE 8: BATTERY BLUFF EAST OVERLOOK RENDERING (PRESIDIO TRUST)

More information about the project, including images and time-lapse photos, can be found at the Doyle Drive/Presidio Parkway website here (<http://www.presidioparkway.org/>).

4.2 Main Post Update

The Programmatic Agreement for the Main Post Update (PA-MPU) was executed on October 26, 2010 and amended in 2015 to establish a process for projects reviewed under the agreement to participate in the Federal Historic Preservation Tax Incentives program. Per stipulation VII.B, the agreement expired in October 2020. The Main Post Update (MPU) envisioned six large projects, each with multiple components and associated mitigation measures. The PA-MPU described the projects, associated documentation, and the review process the Trust would follow to complete these projects. The Trust has completed the majority of the documentation efforts for all MPU projects. The Trust and its development partners have completed two of the four rehabilitation projects (Archaeology Lab & Curation Facilities and The Presidio Theatre¹). The Presidio Chapel project is in the design phase, with further progress pending fundraising efforts by the tenants. No work has been planned or completed on the Presidio Lodge project (not to be confused with the rehabilitation of Building 105 as the “Lodge at the Presidio” in 2018). El Presidio: The Birthplace of San Francisco, and district-wide pedestrian and parking improvements are partially completed.

In July 2020, the Trust initiated consultation to amend the PA-MPU per Stipulation VI.A to extend its duration until December 2030, in order to allow sufficient time to complete the projects contemplated

¹ The Presidio Theatre team submitted its Part III certification package at the end of December 2020 and it was accepted by NPS in July 2021. This step is not addressed by the PA-MPU.

in the Main Post Update and addressed by the PA-MPU. Unfortunately, the Trust was unable to acquire all required signatures prior to the expiration date. The Trust is currently evaluating its project plans for 2022-2023 to determine the utility of circulating a renewed PA-MPU prior to the renewal of the agency-wide PA in 2024. Please look for updates on this front later in 2022.

5 Identification, Evaluation, and Documentation of Potential Historic Properties

The limited scope NHL update prepared by the Doyle Drive/Presidio Parkway project was accepted by the Presidio Trust in June 2019 and the Trust plans to submit the documentation to National Park Service Landmark Program for submittal to the National Historic Landmark Commission in 2022.

With support from student interns and volunteers, The Trust will complete a Historic Structures Report (HSR) for Building 102 in anticipation of future work. Updates on HSR preparation in 2022 will be provided under the terms of Stipulation III.B.2. as applicable.

Trust staff completed three Preservation Maintenance Plans and one set of Rehabilitation Guidelines in 2021. The Maintenance Plans support leasing activity of three buildings (Log Cabin, B1299; Golden Gate Club, B135; and Chapel of our Lady, B45), detailing character defining features and maintenance requirements. The Rehabilitation Guidelines Created for the rehabilitation of the East Mason Warehouses (21-042) guide the scope of work and provide specific treatment requirements for the cluster of seven warehouse buildings.

6 Archaeology Program

In 2021, Trust archaeology staff provided NHPA compliance support for ongoing Trust operations and cared for previously excavated collections. This summary outlines the Trust archaeology team's efforts to comply with NHPA, including a summary of archaeological monitoring and identification completed.

6.1 Archaeological Management Assessments, Identification, and Monitoring

Archaeology staff worked with Presidio Trust planning staff and cultural resource consultants to support several projects within the Presidio in 2021. One Archaeological Management Assessment (AMA) was prepared for the East Mason Warehouse Rehabilitation Project. An Archaeological Management Assessment and Monitoring Plan was prepared for the Verizon Cell Site 27 A-D Project. Both plans are included here in Appendix E. No Archaeological Identification Plans (AIP) were issued in 2021.

Archaeology staff directly provided archaeological field support for thirty projects in the Presidio in 2021. Trust archaeology staff monitored twenty-five projects, several of which were in conjunction with Doyle Drive 3 construction. Monitoring was also conducted during several ongoing regular Trust operations activities within archaeologically sensitive areas. Archaeology staff continued to provide field support of the Tunnel Tops project and several tenant improvements projects. Archaeologists responded to five discoveries in the park and determined appropriate treatment for resources uncovered. No significant archaeological resources were identified in any of these projects.

6.2 Archaeological Research and Program Highlights

Archaeological research resumed in June 2021, after Covid conditions allowed. Research focused on El Presidio de San Francisco, the Spanish-colonial archaeological site and a contributing area of the Presidio NHD. El Presidio Archaeological Identification Season 2021: (ELPAIS 2021) is part of a long-term research project on Pershing Square in the Presidio's Main Post. The project follows the finalization of Levantar the Archaeological Management Plan for El Presidio in 2012, which details the management approach and archaeological methods involved for work at El Presidio.

Excavation was concentrated in an area where Spanish and Mexican adobe structures were repurposed by the US Army until their eventual demolition in 1906. Investigations were conducted by Trust archaeology staff and volunteers who assisted in field and laboratory processing. Seventy-seven volunteers contributed more than 2,200 hours to the project. The investigations took place on Thursdays, Fridays and Saturdays between June and October 2021. A full report of ELPAIS 2021 is underway and will be completed in early 2022.

All archaeological material recovered from the Presidio is permanently curated in the on-site federal curation facility, which meets the requirements of a curation facility as described in 36 CFR Part 79 – Curation of Federally-Owned and Administered Archeological Collections.

7 Curation Program

Curation at the Presidio Trust includes exhibitions and collections management. The report that follows focuses primarily on the agency's regulatory activities related to its archaeological collections, with specific additional collections management items noted. Exhibition-related curatorial activities are generally not described, except to the extent that they involve these collections.

The Presidio Trust curates archaeological collections generated by agency resource management activities. The agency is obligated to manage these collections in compliance with 36 C.F.R. § 79, *Curation of Federally Owned and Administered Archaeological Collections*, which establishes federal agencies' responsibilities and requirements for the long-term management, preservation, and use of archaeological collections recovered under the authority of relevant federal laws, including but not limited to the National Historic Preservation Act.

Trust board-approved collections policies and implementing guidelines further detail curatorial protocols for complying with federal law and regulation (<https://www.presidio.gov/presidio-trust/planning/board-policies>). They also distinguish between the agency's archaeological collections, described in the *Archaeological Collections Policy*, and other types of collections.

7.1 Management, Preservation, and Use of Collections

The archaeological collections are currently comprised of approximately 800,000 material remains, 100 linear feet of associated records, and 100 GB of digital data, with an annual growth rate of up to 4%. All collections are curated on site at the Presidio Trust's Curation Facility.

In 2021, due to the global SARS-CoV-2/COVID-19 pandemic, collections management, preservation, and use activities continue to be conducted remotely. Notable management and preservation activities included rectifying database records through several quality control initiatives, planning for the migration of the collections database server, and initiating comprehensive planning for long-term collections management needs, including staffing, storage, preservation, accessibility, and core document revision. The limited re-opening of the Presidio Officers' Club in the third quarter of 2021 shifted focus to exhibition management for the last half of the year. This required two to three in-office days dedicated to exhibition maintenance and data collection.

The Trust received and addressed seven unsolicited donation inquiries for historic and archival materials during 2021. In keeping with its *Museum Collections Policy*, the agency does not maintain a permanent, accessioned museum collection of historic objects and archives related to the Presidio and therefore does not accept donations. Potential donors were referred to the National Park Service Park Archives and Records Center at the Golden Gate National Recreation Area.



FIGURE 9: EXCLUSION EXHIBIT LOAN, 2021 (PRESIDIO TRUST)

In 2021, the Trust's archaeological collections were used internally and externally for exhibition, teaching, public interpretation, scientific analysis, and scholarly research. Exhibitions at the Presidio Officers' Club and Presidio Archaeology Lab Gallery, developed and managed by the Trust, showcase the agency's archaeological collections as well as collections on loan. In 2021, the Presidio Officers' Club re-opened to the public on September 4th with limited hours from 11am-4pm on Saturdays. This pilot phase is expected to run through the first week of March. The Heritage Gallery has served 1,135 visitors from re-opening through the end of December.

The Trust has sixteen active incoming loans that support these exhibitions, managed under the *Museum Collections Policy*, and four active outgoing loans, managed under the *Archaeological Collections Policy*. Three of four outgoing loan agreements were executed in 2021. One was the execution of a new loan between the Trust and Dr. Emily Jones, Associate Professor of Anthropology of University of New Mexico. The loan makes artifact assemblages from the Trust's collections available for historical archaeological research. This work facilitates the analysis of faunal specimens and supports Dr. Jones' research related to the spread of horse throughout western North America.

A renewed loan agreement between the Trust and the National Japanese American Historical Society (NJAHS) was established. The loan supports the special exhibition at the Officers' Club, *EXCLUSION: The Presidio's Role in World War II Japanese American Incarceration*. The loan agreement included the rotation of a suitcase that was brought to Topaz, a war relocation center during World War II. This renewal enables Presidio Trust to continue and strengthen partnerships with outside organizations, like NJAHS. These partnerships support exhibitions for the Presidio Trust.

The Trust fulfilled three external research requests that utilized archaeological collections. Researchers affiliated with the San Diego Presidio requested images of and data about *galera*, a type of ceramic, to aid their efforts in developing conjectural reconstructions of decorative patterns for that ware type. A curator from the Arizona State Museum at the University of Arizona requested grey literature reports containing zooarchaeological analyses, in support of their research compiling archaeological data on the diet of soldiers stationed at presidios during 18th and 19th centuries. An undergraduate at the University of California, Berkeley requested literature to support their honor's thesis addressing the consumption of meat at the Presidio during the Spanish American War as evidenced in zooarchaeological assemblages. A fourth researcher, from the Università di Genova in Genoa, Italy, requested information on 17th century bronze cannon at the Presidio for their research on historic artillery.

8 SOI Qualified Staff and Professional Development

The Trust's Planning and Compliance Department houses the cultural resources team which includes Secretary of the Interior (SOI) qualified staff in the areas of Architectural History, Archaeology, and Curation. SOI qualified staff in the areas Historic Landscape and Architecture Historic Architect are in the Park Design and Construction Department. Staff resumes are included in Appendix C.

Due to the ongoing pandemic, professional development opportunities were limited in 2021. The Trust Cultural Resources management team is in the process of planning education and enrichment activities for 2022, and will look forward to reporting back on these efforts in next year's report. The cultural resources team took part in a volunteer day, clearing brush and picking up trash at the Lobos Valley Overlook.



FIGURE 10: CULTURAL RESOURCES TEAM VOLUNTEER DAY

Appendix A: 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, 2014

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**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**

13 **WHEREAS**, the Presidio Trust (the Trust), pursuant to the Presidio Trust Act, Title I of Public Law 104-
14 333, was established as a wholly owned government corporation to manage a portion of the Presidio of
15 San Francisco (Presidio); and

16
17 **WHEREAS**, pursuant to Public Law 104-333, administrative jurisdiction was transferred to the Trust on
18 July 1, 1998 for approximately 80% of the Presidio that was depicted as Area B on the map entitled
19 “Presidio Trust Number 1,” dated December 7, 1995, (see Appendix C) which may be amended from
20 time to time, and which serves as the area of potential effect (APE) for this undertaking; and

21
22 **WHEREAS**, the entire Presidio is within the Golden Gate National Recreation Area (GGNRA) and is a
23 designated National Historic Landmark District (NHLD) representing 218 years of military history, is
24 listed on the National Register of Historic Places (NRHP), and contains individually eligible NRHP
25 historic properties that are both prehistoric and historic; and

26
27 **WHEREAS**, the Trust, in order to uphold its Congressionally mandated requirement of preserving Area
28 B of the Presidio as part of GGNRA and of financial self-sufficiency, carries out a variety of
29 undertakings subject to review under Section 106 of the National Historic Preservation Act (NHPA), 16
30 U.S.C. § 470f, and its implementing regulations, 36 C.F.R. Part 800, including but not limited to
31 maintenance, rehabilitation, repair, moving, interim and long-term leasing, construction and demolition of
32 buildings, structures, and roads, and work regarding grounds and associated landscaping as proposed
33 under the Presidio Trust Management Plan (PTMP, 2002 with updates), or proposed under the direct or
34 indirect jurisdiction of the Trust including undertakings proposed by the Trust's permittees, federal or
35 non-federal tenants, or other parties; and

36
37 **WHEREAS**, the Trust has determined that these undertakings may have an effect upon historic
38 properties listed in or eligible for listing in the NRHP, including properties that contribute to the NHLD,
39 and has consulted with the Advisory Council on Historic Preservation (ACHP) and California State
40 Historic Preservation Officer (SHPO) pursuant to 36 C.F.R. Part 800; and

41
42 **WHEREAS**, the Trust has notified the Secretary of the Interior (SOI) in accordance with 36 C.F.R. §
43 800.10(c), and the National Park Service’s (NPS) Pacific West Regional Office and the GGNRA are
44 representing the SOI, and have been invited to sign this Programmatic Agreement (PA) as an invited
45 signatory, and that both the Pacific West Regional Office and GGNRA will receive information and
46 participate in consultations, and that the Pacific West Regional Office will be the signatory authority for
47 NPS; and

48
49 **WHEREAS**, the Trust has identified and notified parties as consulting parties (Appendix G); and
50

51 **WHEREAS**, the Trust has invited the National Trust for Historic Preservation (NTHP) and the Presidio
52 Historical Association (PHA) to sign this PA as concurring parties; and
53

54 **WHEREAS**, in July and November 2013 the Trust notified the public through its regular “eNews”
55 electronic mail distribution list of the consultation for the development of this PA, and afforded them the
56 opportunity to comment; and
57

58 **WHEREAS**, the Trust has made a good faith effort to locate federally recognized Indian tribes that may
59 attach religious and cultural significance to properties under the administrative jurisdiction of the Trust or
60 with which the Trust could consult under the Native American Graves Protection and Repatriation Act
61 (NAGPRA); and the Trust has determined that there are no such federally recognized tribes; and
62

63 **WHEREAS**, in accordance with 36 C.F.R. § 800.6(a)(1), the Trust has notified the Advisory Council on
64 Historic Preservation (ACHP) of its effect determination providing the specified documentation, and the
65 ACHP has chosen to participate in the consultation pursuant to 36 C.F.R. § 800.6(a)(1)(iii) (the Trust,
66 SHPO, and the ACHP are each a “Signatory,” and the NPS is an “Invited Signatory” to the PA and,
67 hereafter are “Signatories”); and
68

69 **WHEREAS**, the remaining area of the Presidio depicted as Area A on “Presidio Trust Number 1,” dated
70 December 7, 1995,(see Appendix C) remains under the administrative jurisdiction of the NPS and is not
71 subject to this PA; and
72

73 **WHEREAS**, the San Francisco National Cemetery remains under the administrative jurisdiction of the
74 United States Department of Veterans Affairs and is not subject to this PA; and
75

76 **WHEREAS**, the undertakings contemplated under the Main Post Update (MPU), adopted by the Trust in
77 2011, are not subject to this PA, but are within the scope of the *Programmatic Agreement Among the*
78 *Presidio Trust, the California State Historic Preservation Officer, the National Park Service, and the*
79 *Advisory Council on Historic Preservation for the Main Post Update to the Presidio Trust Management*
80 *Plan, Presidio of San Francisco National Historic Landmark, San Francisco, California (PA-MPU,*
81 *2011); and
82*

83 **WHEREAS**, the undertakings contemplated under the *Programmatic Agreement Among the Presidio*
84 *Trust, the Advisory Council on Historic Preservation, the National Park Service and the California State*
85 *Historic Preservation Officer Regarding Deconstruction, New Construction, and the Execution of*
86 *Associated Leases at the Letterman Complex, Presidio of San Francisco, California (LDA PA, 2000)*
87 have been completed and according to Stipulation XIII of the LDA PA the signatory parties have agreed
88 to terminate the PA; and
89

90 **WHEREAS**, the PTMP is a comprehensive programmatic plan developed by the Trust to guide the
91 management of Area B and is a programmatic document that presents a range of preferred land uses,
92 Planning Principles (Principles), and Planning District Guidelines (PDG) for identified planning districts
93 within Area B of the Presidio; the Principles and PDG are intended as a policy framework to guide the
94 Trust’s future activities as well as further project-specific and/or district-level planning prior to building
95 demolition or new construction with the potential to adversely affect historic properties; and
96

97 **WHEREAS**, the Trust, SHPO, NPS, and the ACHP consulted on the PTMP, including its Principles and
98 PDG, and executed an agreement document in 2002, which the NTHP and PHA signed as concurring
99 parties, that expires on April 30, 2014, or upon execution of this PA; and
100

101 **WHEREAS**, the Trust will employ the 2013 Council for Environmental Quality (CEQ) and ACHP
102 guidance for coordinating its agency procedures and mechanisms (including mechanisms under the
103 National Environmental Policy Act (NEPA)) to fulfill their consultation requirements as found in the
104 "NEPA and NHPA: Handbook for Integrating NEPA and Section 106 Reviews" (CEQ/ACHP Guidance);
105 and
106

107 **WHEREAS**, the Trust and NPS have conducted numerous surveys and evaluations to identify NRHP-
108 eligible and NHLD-contributing properties for the entire Presidio NHLD, including archaeological
109 surveys, and regardless of administrative jurisdiction; the most complete survey to date is the 1993
110 NHLD update; the Trust is currently determining if there are additional properties in Area B not
111 previously listed or determined eligible for listing on the NR or as contributors to the NHLD via the 2008
112 NHLD update, which considers eligibility of post-1945 resources, but does not re-evaluate resources
113 listed in the 1993 NHLD update; and
114

115 **WHEREAS**, the Trust has secured a commitment from the Federal Highways Administration (FHWA)
116 through the *Programmatic Agreement among the Federal Highway Administration, the California*
117 *Department of Transportation, the San Francisco County Transportation Authority, the Presidio Trust,*
118 *the National Park Service, the Department of Veterans Affairs, the California State Historic Preservation*
119 *Officer, the Advisory Council on Historic Preservation, and the San Francisco County Recreation and*
120 *Parks Department for the South Access to the Golden Gate Bridge, Doyle Drive Replacement Project,*
121 *San Francisco, California* (Doyle Drive PA, 2008) to comprehensively update the NHLD forms again at
122 the conclusion of the Doyle Drive/Presidio Parkway construction project (estimated 2016); and
123

124 **WHEREAS**, the Trust shall strive to manage and preserve the integrity of that portion of the NHLD in
125 Area B through planning, research, and specific undertakings consistent with good historic preservation
126 management and stewardship, the goals of the NHPA and related regulations, standards, and guidelines;
127 these efforts are with the objective of remaining in compliance with the applicable provisions of the
128 NHPA and the Presidio Trust Act; and
129

130 **WHEREAS**, the Trust as the federal agency with administrative jurisdiction for Area B is the responsible
131 agent for design consistency, conformance with building codes, life/safety and accessibility standards,
132 conformance with sustainability guidelines and goals, and integration and operation of infrastructure
133 systems such as electricity, water, and sewer and has developed a Tenant Handbook and other such
134 descriptive materials to guide this responsibility; and
135

136 **WHEREAS**, the Trust has consulted with the SHPO, NPS and the ACHP regarding ways to ensure that
137 the Trust's operation, management, and administration of the NHLD provides for management of the
138 Presidio's historic properties in accordance with the relevant sections of the NHPA; and
139

140 **NOW, THEREFORE**, the Trust, NPS, SHPO, and ACHP agree that the undertakings shall be
141 implemented in accordance with the following stipulations in order to take into account the effect of the
142 undertaking on historic properties.

143 **STIPULATIONS**

144
145
146 The Trust shall ensure that the following measures are carried out:

147
148 **I. ROLES AND RESPONSIBILITIES**

149
150 A. The Trust

151
152 1. The Trust’s Executive Director shall be the designated Federal Preservation
153 Officer (FPO) and shall be responsible for funding the agency’s preservation program
154 and assigning qualified staff and other resources to carry out identification and
155 management responsibilities effectively. The FPO will have sufficient authority and
156 control over internal processes to ensure that decisions made pursuant to this PA are
157 carried out.

158
159 2. The FPO shall designate a Deputy Federal Preservation Officer (DFPO) who
160 shall be responsible for coordination of the preservation program and implementation of
161 the terms of this PA. The DFPO shall meet the requirements for a Preservation Officer as
162 defined in “The Secretary of the Interior’s Standards and Guidelines for Federal Agency
163 Historic Preservation Programs Pursuant to the National Historic Preservation Act,” have
164 five years or more experience in historic preservation and meet the professional
165 qualifications for Archaeologist, Historian, Architectural Historian or Historic Architect
166 included in “The Secretary of the Interior’s Historic Preservation Professional
167 Qualification Standards.” The DFPO shall coordinate with the NEPA Compliance
168 Manager and N² Compliance Coordinator in carrying out the provisions of Stipulations
169 IV and V.

170
171 3. All work pursuant to this PA regarding historic properties will be performed by,
172 reviewed by, or under the supervision of, a person or persons having five years or more
173 experience in historic preservation and meeting the professional qualifications for
174 Archaeologist, Historian, Architectural Historian, or Historic Architect included in “The
175 Secretary of the Interior’s Historic Preservation Professional Qualification Standards.”
176

177 4. The Trust shall ensure that the agency’s operation, management, and
178 administration of the Presidio’s historic properties are carried out in accordance with
179 Section 112 of the NHPA.

180
181 B. SHPO, NPS, and the ACHP

182
183 1. The SHPO and the NPS will review and comment on undertakings in accordance
184 with Stipulations IV, V, VI, VII and VIII may raise and resolve objections according to
185 Stipulation IX, and may amend or terminate this agreement according to Stipulations X
186 and XI.

187
188 2. The ACHP may raise and resolve objections according to Stipulations IV and IX
189 and may amend or terminate this agreement according to Stipulations X and XI.

190
191 C. Concurring Parties

193 1. Concurring parties may review and comment on undertakings pursuant to
194 Stipulation IV, VI, and VII and may raise objections according to Stipulation IX.

195
196 D. The Public

197
198 1. The public may participate in public comment periods and review undertakings
199 according to Stipulation IV, and review and comment on the Trust’s annual report in
200 accordance with Stipulation XIV.

201
202 **II. CONTINUING EDUCATION**

203
204 A. The Trust shall provide ongoing and appropriate training to Trust personnel involved in
205 the maintenance, repair, and rehabilitation of historic buildings, structures and housing units, and
206 for all personnel responsible for making decisions regarding maintenance, repair, and
207 rehabilitation at the Presidio.

208
209 B. The Trust shall regularly organize, facilitate, or partner with outside organizations to
210 provide specialized crafts training programs in practical application of “The Secretary of the
211 Interior’s Standards for the Treatment of Historic Properties” (Secretary’s Standards) and other
212 subject matter related to management of the NHLD to applicable Trust staff.

213
214 C. The Trust shall provide training in conservation practices as applied to historic structures
215 and archaeological sites to Trust personnel for work at the Presidio.

216
217 D. The Trust shall develop and implement an in-house training program to advise Trust
218 personnel of this PA and procedures, techniques, and related matters regarding the preservation of
219 the historic properties located within Area B within six months of execution of this PA. The
220 training will be repeated every other year thereafter.

221
222 E. The Trust shall provide guidance and available research materials, reports, NRHP forms,
223 condition assessments, the Tenant Handbook, design standards, and all such materials in its
224 possession that will assist tenants or other parties in designing projects that may affect historic
225 properties at the Presidio, including the following:

226
227 1. Provide guidance in Presidio design and construction standards as indicated in
228 the Tenant Handbook and other verbal and written guidance materials.

229
230 2. Provide guidance in the professional areas of historic preservation, architecture,
231 engineering, fire and life/safety, security, building construction, materials conservation,
232 historic architecture, historic landscape architecture, archaeology, and history as
233 appropriate.

234
235 3. Provide ongoing review in the disciplines of historic architecture, historic
236 landscape architecture, and archaeology, on historic building and landscape rehabilitation
237 designs, and advise project proponents as designs progress and on modifications to
238 scopes of work that will bring them into compliance with the Secretary’s Standards.

239
240 F. The Trust shall detail the scope of professional development undertaken each year as part
241 of the Trust’s annual report in accordance with Stipulation XIV.

242

243 **III. DOCUMENTATION, IDENTIFICATION, EVALUATION & ANALYSIS OF HISTORIC**
244 **PROPERTIES**

245
246 A. Documentation, Identification & Evaluation of Historic Properties

247
248 1. Evaluation of buildings or structures shall be conducted within the framework of
249 the National Historic Landmarks Criteria, the NRHP Criteria, and the “National Register
250 of Historic Places Registration Forms for the Presidio of San Francisco National Historic
251 Landmark District” (1993, or subsequent updates). If properties are found that date to
252 either before or after the period of significance (such as prehistoric) or do not fit the NHL
253 criteria, those properties will be individually evaluated under NRHP criteria.
254

255 2. If a property in Area B that was not previously listed as a contributor to the
256 NHLD or determined eligible for listing on the NRHP is determined by the Trust to be
257 eligible, the Trust shall treat that property as eligible for purposes of this PA. The Trust
258 shall consult on such decisions with the NPS and SHPO. Consultation on these decisions
259 should not exceed 30 days unless another time period is agreed to by the signatories. Any
260 such consultations will be documented in the Trust’s annual report in accordance with
261 Stipulation XIV below, and according to appropriate documentation protocols determined
262 in consultation with SHPO and the NPS.
263

264 3. If the Trust determines that a property not previously listed or evaluated does not
265 contribute to the NHLD or is not eligible for listing on the NRHP, the Trust shall consult
266 with the SHPO and NPS on such decisions. Consultation on these decisions should not
267 exceed 30 days unless another time period is agreed to by the signatories. Such
268 consultations will be documented in the Trust’s annual report in accordance with
269 Stipulation XIV below, and according to appropriate documentation protocols determined
270 in consultation with SHPO and the NPS.
271

272 4. The Trust shall evaluate, or cause to be evaluated, the significance of and apply
273 NHL and NRHP criteria to archaeological properties that have not previously been
274 evaluated for contributing to the NHLD or determined eligible for listing on the NRHP.
275 The Trust shall consult with the SHPO and NPS on such decisions. Consultation on these
276 decisions should not exceed 30 days unless another time period is agreed to by the
277 signatories. Such consultations will be documented in the Trust’s annual report in
278 accordance with Stipulation XIV below, and according to appropriate documentation
279 protocols determined in consultation with SHPO and the NPS.
280

281 5. If the Trust, NPS, and SHPO disagree about a property the Trust has determined
282 eligible or ineligible, the Trust will submit the matter to the Keeper of the National
283 Register in accordance with 36 C.F.R. Part 63(d).
284

285 6. Should a concurring party to this PA or a member of the public believe that a
286 property found ineligible under this stipulation is eligible as a contributor to the NHLD or
287 for listing in the NRHP, that party or person may contact the Trust, SHPO, and NPS to
288 request consultation on the determination. Consultation should not exceed 30 days.
289 Should the consultation fail to reach concurrence on the determination, that party or
290 person may contact the Keeper of the National Register and request a determination of
291 eligibility under 36 C.F.R. § 63.4.
292

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7. Ten years following the acceptance by the NPS of the NHLD update that will be completed by FHWA in accordance with the Doyle Drive PA, the Trust shall initiate the next comprehensive update to the NHLD.

B. Analysis of Historic Properties

1. The Trust may, at its discretion, prepare analysis documents and issue-oriented plans in order to inform maintenance plans or consultation around rehabilitation or management strategies for historic properties. These documents shall include, but not be limited to, sub-district or site-specific design guidelines, historic structure reports (HSRs), cultural landscape reports (CLRs), or issue-oriented plans (e.g., Vegetation Management Plan, Historic Forest Character Study).

a) The Trust shall prepare CLRs according to the format recommended by Chapter 7 (Management of Cultural Landscapes) of *NPS 28: Cultural Resource Management Guideline*.

b) All HSRs shall be written in accordance with the standards established in *Preservation Brief 43: The Preparation and Use of Historic Structure Reports* (NPS, 2005). The HSRs will include a history of the property/building, construction history, archaeology, architectural evaluation, conditions assessment, maintenance requirements, recommendations for proposed work, copies of original drawings and specifications (if available), current drawings if different from the original, and historic and current photographs.

c) Sub-district or site-specific design guidelines shall remain consistent with applicable Principles and PDGs to the maximum extent possible.

2. The Trust shall notify parties of its intent to prepare a document under this stipulation via electronic mail once a project has been initiated.

a) Upon completion of a first draft, the DFPO shall provide copies of the document to signatory and concurring parties for a 30 day review and comment period, unless another time period is agreed to by the signatories, prior to finalization. Documents will be sent in electronic or hard copy according to the recipient organization's requirements.

b) Comments received within the comment period will be considered in the finalization of the documentation.

c) The DFPO will circulate a summary of all comments received during the review period and the Trust's responses along with final copies of the documents.

d) Final copies of the documents shall be posted to the Trust's website and described in the Trust's annual report in accordance with Stipulation XIV.

341 3. Completion of an analysis document that contains treatment recommendations
342 shall not substitute for review of an undertaking involving applicable historic properties
343 under Stipulation IV. Rather, the documents prepared under this stipulation are intended
344 to inform the Trust's and consulting parties' ability to assess and reach determinations of
345 effect for undertakings reviewed under Stipulation IV.
346

347 **IV. REVIEW OF UNDERTAKINGS**

348 **A. Determine the Undertaking**

349 1. Early in the planning process, consistent with 36 CFR 800.1(c), the DFPO shall
350 determine if a proposed project, which may originate from the Trust, Trust's permittees,
351 federal or non-federal tenants, or other parties, constitutes an undertaking.
352
353

354 a) If the DFPO determines the proposed project has no potential to cause
355 effects to historic properties, then the Trust has no further obligations under this
356 Stipulation.
357

358 b) If the DFPO determines the proposed project is an undertaking with the
359 potential to cause effects on historic properties, the DFPO will proceed to the
360 next step in the review process in accordance with Stipulation IV(A)(2).
361

362 2. The DFPO shall assign one of the following categories to the undertaking.
363

364 a) Undertakings that are repetitive and low impact in nature (as described in
365 Appendix A; to be reviewed in accordance with Stipulation IV(A)(3)).
366

367 b) Undertakings that relate to the ongoing operation and maintenance of the
368 Presidio that include, but are not limited to the following: maintenance,
369 rehabilitation, repair, moving, interim and long-term leasing, road modifications
370 or improvements, and work regarding grounds and associated landscaping, traffic
371 and parking improvements, utility and infrastructure work, natural resource
372 restoration, environmental remediation and forestry work, permits, leases, or
373 other agreements issued by the Trust. These undertakings will be reviewed
374 through the N² process that includes joint NHPA and NEPA (at the Categorical
375 Exclusion, or CE, level) in accordance with Stipulation IV(C)(1).
376

377 c) Undertakings that relate to stand-alone new construction, substantial
378 additions to historic buildings or landscapes, partial or full demolition of historic
379 properties, a rehabilitation that includes any of the previous actions as part of its
380 scope, or undertakings that are not associated with the PTMP, an issue oriented
381 plan, or site specific design guidelines, within Area B. These undertakings will
382 be reviewed by coordinating NHPA and NEPA (at the Environmental
383 Assessment/Environmental Impact Statement (EA/EIS) level in accordance with
384 Stipulation IV(C)(2)).
385

386 d) Undertakings that seek to obtain certification under the Federal Historic
387 Preservation Tax Incentives Program (known as Tax Credit Reviews), and
388 reviewed in accordance with Stipulation V.
389

390

391 e) Undertakings that may affect historic properties, but do not fit into one of
392 the above categories listed in Stipulation IV(A)(2)(a) through (d) shall be
393 reviewed in accordance with 36 C.F.R. § 800.

394
395 3. If the DFPO determines the undertaking is an activity that is listed in Appendix
396 A, the DFPO will document this determination for inclusion in the Trust's annual report
397 (Stipulation XIV), and the Trust has no further obligations under this Stipulation.
398

399 4. If the DFPO determines the undertaking is not an activity that is listed in
400 Appendix A, the DFPO will continue on in the analysis and review process, beginning
401 with Stipulation IV(B).
402

403 B. Define the Area of Potential Effects and Identify Historic Properties

404
405 1. The DFPO shall determine and document the undertaking's APE taking into
406 account direct, indirect, and cumulative effects.
407

408 2. The DFPO will identify historic properties within the APE using the 1993
409 Update, the 2008 Update, subsequent NHL updates, or additional surveys if warranted. If
410 there are unevaluated properties in the APE that may be eligible individually or as
411 contributors to the NHL, the Trust shall consult with the SHPO and NPS according to
412 Stipulation III.
413

414 3. If the DFPO determines that the APE contains no contributing or eligible
415 resources, the DFPO shall consider the effect the project may have on the NHL as a
416 whole. If the DFPO determines that the NHL or other historic properties will not be
417 affected, this determination shall be documented for inclusion in the Trust's annual report
418 (Stipulation XIV).
419

420 4. If the DFPO identifies a historic property that may be directly, indirectly, or
421 cumulatively affected within the APE, the DFPO will continue on in the review process.
422

423 C. Assessment of Effects from the Undertaking and Resolution of Adverse Effects

424
425 The DFPO will assess the effects of the proposed undertaking, including cumulative effects, on
426 historic properties using the criteria of adverse effects (36 C.F.R. § 800.5(a)(1)) and the Trust will
427 complete the review process using one of the following compliance pathways.
428

429 1. N² Review Process

430
431 a) The Trust will assign a responsible project manager (PM) for each
432 undertaking. The PM, who will represent the Trust, Trust's permittees, federal or
433 non-federal tenants, or other parties, shall submit a package describing the
434 proposed undertaking to the N² Compliance Coordinator for review by the DFPO
435 and Trust NEPA Compliance Manager. The package will consist of a project
436 summary document (known as a "Project Screening Form"), plans, drawings,
437 specifications, photos, and any other information useful for describing the
438 proposed undertaking.
439

- 440 b) The DFPO shall add a description of the APE, in accordance with
441 Stipulation IV(B)(1), to the Project Screening Form.
442
- 443 c) The DFPO shall add identified historic properties, in accordance with
444 Stipulation IV(B)(2), to the Project Screening Form.
445
- 446 d) If necessary, the DFPO shall consult with the PM and other staff
447 qualified according to Stipulation I(A)(3) in order to ensure that the undertaking
448 can achieve a finding of no adverse effect.
449
- 450 e) In collaboration with the Trust's Principal Archaeologist, Archaeologist
451 or other qualified archaeologist, the DFPO shall ensure that an appropriate level
452 of archaeological identification, assessment, or monitoring is performed for
453 undertakings on top of or in proximity to archaeological areas of the NHL (see
454 Appendix D), in accordance with an Archaeological Management Assessment
455 (AMA) prepared for the undertaking in accordance with Stipulation VI.
456
- 457 f) The DFPO shall make one of the following determinations (see
458 Appendix E for a flow chart of the below steps):
459
- 460 (1) **Historic Property Affected, No Adverse Effect** - If the above
461 process results in the DFPO determining there is no adverse effect, the
462 DFPO will document that finding in the undertaking's administrative
463 record, along with stipulations to ensure that any unanticipated adverse
464 effects are avoided, and ensure that the finding is included within the
465 Trust's annual report in accordance with Stipulation XIV, and the
466 undertaking may be implemented
467
- 468 (2) **Historic Property Affected, No Adverse Effect through**
469 **Conditions** - If the above process results in the DFPO's finding that the
470 proposed undertaking will have no adverse effect on historic properties
471 with conditions, the DFPO will place the item on the agenda for the
472 weekly N² review, which will consist of the following:
473
- 474 (a) The DFPO will prepare a project summary for
475 circulation via electronic mail to qualified Trust staff that will
476 participate in the review, signatory parties, except the ACHP,
477 and concurring parties no later than the Monday before the
478 regular Thursday morning meetings (occurring each week at
479 10:00 am Pacific Time). The project summary shall include
480 information describing how the undertaking has been designed to
481 avoid adverse effects. Hard copies of the Project Screening
482 Form and supporting materials will also be made available in the
483 Trust library, located at 103 Montgomery Street, for review and
484 comment by the public.
485

486 (b) Signatory, concurring parties and the public may submit
487 comments or questions about the project ahead of the Thursday
488 meetings; signatory and concurring parties may also attend the
489 meeting in person. Trust staff qualified under Stipulation I(A)(3)
490 will review the project documents ahead of time and be present
491 at the meeting to contribute to the discussion and development of
492 conditions.

493
494 (c) Trust compliance staff will document meeting minutes
495 and conditions required to support the no adverse effect
496 determination, and circulate these draft minutes to signatory and
497 concurring parties via electronic mail for comment or questions
498 within five (5) business days of the meeting. The minutes and
499 conditions shall reflect input from the DFPO and qualified Trust
500 staff, as well as comments received from signatory and
501 concurring parties or the public.

502
503 (d) Within five (5) business days following circulation of
504 the meeting minutes and project conditions, the DFPO will
505 distribute final minutes via electronic mail and then prepare a
506 Certificate of Compliance (CoC) and Categorical Exclusion (CE)
507 to be included in the undertaking's administrative record.

508
509 (e) The Trust will include the project description and
510 finding in the Trust's annual report in accordance with
511 Stipulation XIV and make the finding available upon request to
512 any party or the public.

513
514 (f) Following the issuance of the CE and/or CoC, and
515 absent objection by any consulting party or member of the public
516 who has requested a copy of the finding, the undertaking may
517 proceed without further review per this Stipulation.

518
519 (g) Because the Trust coordinates its NEPA and NHPA
520 review, projects may appear on the N² agenda that have only
521 NEPA implications (e.g. approval of new herbicides for use in
522 Area B), and do not constitute an undertaking. In these cases, the
523 Trust will note on the agenda that the project has no potential to
524 affect historic properties and thus will not be subject to NHPA
525 review.

526
527 (3) **Historic Property Affected, Adverse Effect** - If the DFPO
528 finds that the proposed undertaking will have an adverse effect on
529 historic properties, the DFPO shall consult with the NPS and SHPO to
530 determine if the adverse effect may be avoided.

531

532 (a) Where the Trust, SHPO, and the NPS agree on measures
533 to avoid adverse effects, they shall document their agreement in
534 the administrative record for the project, and include a summary
535 of avoidance measures for the undertaking in the annual report in
536 accordance with Stipulation XIV. The undertaking may proceed
537 without further review per this Stipulation.
538

539 (b) If the DFPO finds the proposed undertaking will result
540 in an adverse effect and consults with NPS and SHPO but fails to
541 reach agreement pursuant to paragraph IV(C)(1)(f)(3)(a) above,
542 then the DFPO shall also consult with ACHP and the concurring
543 parties to resolve the adverse effect in accordance with 36 CFR
544 800.6.
545

546 2. Coordination with an Environmental Assessment or Environmental Impact
547 Statement Process
548

549 a) If the Trust is preparing an EA or an EIS for NEPA it shall follow
550 recommendations in the CEQ/ACHP Guidance, Section IV “Road Map for
551 Coordination,” relative to development of a comprehensive communication plan,
552 creation of an integrated strategy for completing studies to fill data gaps that
553 meet information standards and timing requirements for both NEPA and NHPA
554 processes, and – where appropriate – descriptions of mitigation commitments in
555 the decision record. The Trust will include a project-specific description of its
556 intended “Road Map for Coordination” as part of the scoping notice for NEPA
557 and initiation of NHPA consultation under this stipulation.
558

559 b) The Trust shall ensure that the undertakings reviewed under this
560 compliance pathway conform to the Secretary’s Standards, the Principles, and
561 any applicable PDG to the maximum extent possible.
562

563 c) First Consultation Package - In coordination with the opening of public
564 scoping for the NEPA process and consistent with 36 CFR 800.1(c), the Trust
565 shall provide the SHPO, the NPS, and concurring parties with an initial
566 consultation package.
567

568 (1) The First Consultation Package shall include the following: a
569 determination of the project to be an undertaking (Stipulation IV(A)(2)),
570 a graphic and written justification for the proposed APE and list of
571 historic properties identified in the proposed APE (Stipulation IV(B)(1)
572 and (2)), and a preliminary assessment of effect based on the
573 undertaking’s consistency with the Secretary’s Standards, Principles, and
574 relevant PDGs.
575

576 (2) Provided the purpose and need describes a project that has been
577 determined to be an undertaking (in accordance with Stipulation
578 IV(A)(2)), the preliminary assessment of effect shall be one of the
579 following: (1) Historic Property Affected, No Adverse Effect, (2)
580 Historic Property Affected, No Adverse Effect through Conditions, or (3)
581 Historic Property Affected, Adverse Effect. The comment period on this
582 consultation package shall be coordinated with the NEPA scoping
583 period, and will be specified in the cover letter. The comment period
584 shall not be fewer than thirty (30) days.

585
586 d) Second Consultation Package & Process - In coordination with the
587 release of a draft EA/Finding of No Significant Impact (FONSI) or draft EIS, the
588 Trust will distribute to the SHPO, the NPS, and concurring parties for comment a
589 second consultation package.

590
591 (1) For undertakings with a preliminary finding of “historic property
592 affected, no adverse effect” or “historic property affected, no adverse
593 effect through conditions”, the Second Consultation Package will contain
594 the following: a final APE, summary of scoping comments and the
595 Trust’s responses, and a determination of effect regarding the
596 undertaking on historic properties. The Trust will include supplemental
597 information in the second consultation package that describes the historic
598 properties and an analysis of how the undertaking will affect them. The
599 package will also contain a request for a consultation meeting among the
600 signatory parties in order to discuss the Trust’s finding and seek a
601 consensus that the undertaking will not adversely affect historic
602 properties, conforms to the Secretary’s Standards, the Principles and any
603 applicable PDGs to the maximum extent possible.

604
605 (a) The concurring parties will have thirty (30) days
606 following the date of receipt of the second consultation package
607 to provide written comments to the Trust for the signatory
608 parties’ consideration during this consultation. The Trust shall
609 provide these comments to the signatory parties.

610
611 (b) The signatory parties will have thirty (30) days
612 following the date of receipt of the second consultation package
613 to provide written comments to the Trust regarding the
614 determination of effect and changes, if any, that are needed for
615 the undertaking to avoid adverse effects, meet the Secretary’s
616 Standards, the Principles and applicable PDGs.

617

618 (c) The consultation meeting to discuss these comments will
619 be held in person or by telephone within ten (10) days of the
620 close of the thirty (30) day comment period described under
621 Stipulation IV(C)(2)(e)(1), or from the close of any extended
622 comment period. The Trust shall provide a summary of all
623 comments from the public gathered via review of the draft EA or
624 EIS to the signatory parties prior to the consultation meeting.
625 The signatory parties may decide to forego the consultation
626 meeting if they have indicated concurrence with the Trust's
627 findings in their comments.

628
629 (d) If the Trust modifies the undertaking in response to
630 comments received from the SHPO and NPS in order to achieve
631 concurrence on a finding of no adverse effect, or the signatory
632 parties concur with the findings or decline to comment, the Trust
633 shall document these modifications, finalize the EA/EIS and
634 revised description of the undertaking, and immediately provide
635 each of the other parties with copies of the final materials. The
636 Trust shall document this determination for inclusion in the
637 Trust's annual report (Stipulation XIV), and the Trust has no
638 further obligations under this Stipulation.

639
640 (2) For undertakings with a preliminary finding of "historic property
641 affected, adverse effect", the Second Consultation Package will contain
642 the following:
643 a final APE, summary of scoping comments and the Trust's responses,
644 and an assessment of the undertaking's effects on historic properties. The
645 Trust will include supplemental information in the second consultation
646 package that describes the historic properties and an analysis of how the
647 undertaking will affect them. The package will also contain a request for
648 a consultation meeting among the signatory parties in order to discuss the
649 Trust's finding and seek a consensus on avoidance measures.

650
651 (a) The concurring parties will have thirty (30) days
652 following the date of receipt of the second consultation package
653 to provide written comments to the Trust for the signatory
654 parties' consideration during this consultation.

655
656 (b) The signatory parties will have thirty (30) days
657 following the date of receipt of the second consultation package
658 to provide written comments to the Trust regarding the
659 assessment of effect and comment on ways the undertaking
660 could be modified to avoid adverse effects, meet the Secretary's
661 Standards, the Principles and applicable PDGs.

662

663 (c) The consultation meeting to discuss these comments will
664 be held in person or by telephone within ten (10) days of the
665 close of the thirty (30) day comment period described under
666 Stipulation IV(C)(2)(e)(1), or from the close of any extended
667 comment period. The Trust shall provide a summary of all
668 comments from the public gathered via review of the draft EA or
669 EIS to the signatory parties prior to the consultation meeting.
670

671 (d) Where the Trust, SHPO, and the NPS agree on how to
672 avoid adverse effects, they shall document their agreement in the
673 administrative record for the undertaking, the Trust may finalize
674 the EA/EIS to include the revised description of the undertaking
675 and immediately provide each of the other parties with copies of
676 the final materials. The Trust shall document this determination
677 for inclusion in the Trust's annual report (Stipulation XIV), and
678 the Trust has no further obligations under this Stipulation.
679

680 (e) If the DFPO consults with NPS and SHPO but fails to
681 reach agreement, then the DFPO shall also consult with ACHP
682 and the concurring parties to resolve the adverse effect in
683 accordance with 36 CFR 800.6.
684
685

686 3. Failure of NPS, SHPO, ACHP, or the concurring parties to comment within the
687 timeframes established by this stipulation or within timeframes otherwise agreed to by
688 those parties on any document submitted for review pursuant to this stipulation will be
689 deemed a waiver of the opportunity to comment, and the Trust may proceed without
690 considering comment(s) that might otherwise have been made. However, the Trust shall
691 consider the reasonable request via written or electronic mail of any signatory party for a
692 modification of the timeframes established by this stipulation.
693

694 **V. Coordination with the Federal Historic Preservation Tax Incentives Program**

695

696 This stipulation applies to all undertakings in Area B proposed by tenants or others (hereby
697 referred to as Applicants) seeking to participate in the Federal Historic Preservation Tax
698 Incentives Program. It defines steps and responsibilities for coordinated Section 106 consultation
699 and Certified Rehabilitation review so that the regulatory objectives of both processes may be
700 met, and so that the Trust's role as the long-term manager of properties in Area B is supported.
701

702 A. Applicants seeking to participate in the Federal Historic Preservation Tax Incentives Program for
703 a historic property or properties located in Area B shall follow the process delineated in 36 CFR
704 Part 67. For Tax Incentive project review, applicants are encouraged to engage in early
705 conversations and coordination with the SHPO. Applicants will be responsible for submitting
706 two copies each of Parts One, Two, and Three applications and amendments to SHPO for review
707 and approval.
708

709 B. The Trust shall accomplish Section 106 review for all Tax Incentive projects proposed by an
710 Applicant through the processes described in Stipulation IV above. Consultation under
711 Stipulation IV will address direct, indirect and cumulative effects. The Trust shall supplement
712 consultation packages described under subparts IV(C)(1)(f)(2)(a) and IV(C)(2)(c) and (d) with

713 information from the Parts One and Two submittals that may assist in the review and comment of
714 participating parties.
715

- 716 1. If the Applicant receives Part Two approval from the NPS-Technical Preservation
717 Services (NPS-TPS) without conditions, the rehabilitation described in the Part Two
718 application will be considered to conform to the Standards; and if Section 106 review
719 under Stipulation IV results in no adverse direct, indirect, or cumulative effects from the
720 undertaking, and Section 106 consultation under Stipulation IV will be concluded.
721
- 722 2. If conditions are placed on the Part Two approval, the Applicant shall be obligated to
723 comply with those conditions.
724
 - 725 i. The conditions may be resolved through compliance with the condition(s) or a
726 Part Two amendment submitted to SHPO for review and approval. If the
727 conditions are met and/or the amendment approved, the rehabilitation described
728 in the Part Two application will be considered to conform to the Standards; and if
729 the Section 106 review under Stipulation IV results in no adverse direct, indirect
730 or cumulative effects from the undertaking, , and Section 106 consultation under
731 Stipulation IV will be concluded.
732
 - 733 ii. In the event that the Applicant cannot or will not modify the project to comply
734 with the conditions, the Applicant may abandon the project or complete Section
735 106 review solely in accordance with Stipulation IV.
736
- 737 3. SHPO and NPS shall be responsible for coordinating comments on consultation packages
738 submitted during the 106 review with comments on tax credit submittals among the
739 separate reviewing offices (e.g., NPS-PWRO and NPS-TPS).
740

741 C. In addition to coordinating review under Stipulation IV(C), the Trust shall perform the following
742 tasks in support of Tax Incentive projects:
743

- 744 1. The Trust will preliminarily review copies of Applicants' Parts One, Two and Three
745 applications, and amendments to Part Two applications, prior to submittal to SHPO. The
746 Trust will review these documents for their accuracy and consistency with Trust codes,
747 regulations, planning documents, guidelines and general design direction as described in
748 the Tenant Handbook and other such descriptive materials adopted or produced by the
749 Trust for Area B. The Trust shall review these documents for no more than fifteen (15)
750 calendar days and submit comments to the Applicant in writing prior to the Applicant's
751 submittal of final documents to SHPO.
752
- 753 2. The Trust shall assist the Applicant in making a determination regarding Functionally
754 Related Structures (FRS) according to 36 CFR 67.6(b)(4), and ensure the Applicant
755 submits adequate documentation to NPS-TPS to confirm the determination in conjunction
756 with the Part One application submittal.
757
 - 758 i. If the NPS-TPS confirms that the tax credit project is an FRS, any other work
759 within the complex of historically functionally related buildings that is not
760 subject to the tax credit project must be submitted to the Trust for Section 106
761 review through Stipulations IV or V and demonstrated to meet the

762 Standards. Such determinations will be documented in the Trust's annual report
763 in accordance with Stipulation XIV below.

764 ii. If NPS-TPS confirms that there are no FRS because there is no historic
765 functional relationship among the structures, a certification decision will be made
766 for the tax credit project only. Any other work must be reviewed separately.

767
768 3. The Trust shall monitor the construction phase of a Tax Incentive project for compliance
769 with any stipulations established through the Certified Rehabilitation process. The Trust
770 shall also monitor the five (5) year recapture period after the Applicant's completion of
771 the rehabilitation beginning from the date when the building or buildings associated with
772 the Certified Rehabilitation is/are placed into service.

773
774 i. The DFPO shall employ the review process described under Stipulation IV for
775 any substantive actions proposed involving a Certified Rehabilitation during the
776 five (5) year recapture period.

777
778 ii. The DFPO shall direct the applicant to notify SHPO in writing to describe the
779 nature of the proposed undertaking and request comment as to its appropriateness
780 according to terms established via the Certified Rehabilitation. SHPO may
781 consult with NPS-TPS as appropriate on the proposed additional work.

782
783 iii. The DFPO shall ensure that the additional work is carried out according to
784 direction from the SHPO and NPS-TPS

785
786 iv. The DFPO shall document the work, along with the rest of the undertaking, in the
787 Trust's annual Section 106 report in accordance with Stipulation XIV.

788 789 **VI. ARCHAEOLOGY**

790
791 The Trust shall take all reasonable measures to protect archaeological sites and features identified inside
792 the NHL. To accomplish this and inform the design process, an AMA shall be prepared by a qualified
793 archaeologist for all undertakings that involve ground-disturbing activities within or adjacent to
794 archaeologically sensitive areas (Stipulation IV(A)(2)(b-d)). All other ground disturbing activities are
795 subject to archaeologist review via the Trust's dig permit process. The Trust's qualified archaeologist
796 shall include copies of completed AMA's in the Trust's annual report in accordance with Stipulation XIV.
797 Based on the Trust's assessment under Stipulation IV(C)(1)(e), the AMA will outline a course of action
798 for the projects. This course of action shall include one or more of the following:

799
800 A. The Trust shall develop a project-specific monitoring plan for those projects that are not
801 anticipated to have an adverse effect, or that have been designed to avoid adverse effect during
802 design development but that nonetheless are in or adjacent to identified or predicted
803 archaeological areas (in accordance with Stipulation IV(C)(1)(f)(1) or IV(C)(1)(f)(2)). The
804 monitoring plan will describe measures to protect archaeological features and will include the
805 proposed location and frequency of monitoring along with required documentation procedures.
806 Measures to identify, assess, and determine the appropriate treatment of archaeological features
807 should they be encountered will be consistent with the discovery protocols (Appendix B).

809 B. The Trust shall develop a project-specific treatment plan at the completion of the
810 schematic phase for projects that may have an adverse effect as determined under Stipulation
811 IV(C)(1)(f)(2) but that require further identification to understand the content and dimensions of
812 the features, to assess the nature and extent of the effect, and/or to guide continuing efforts to
813 avoid the adverse effect. For the purposes of the undertaking, the Trust may assume NRHP
814 eligibility for archaeological features identified. Identification will further refine
815 recommendations in the AMA and may lead to a monitoring or treatment plan so that adverse
816 effects will be avoided.

817
818 C. The Trust shall develop a project-specific treatment, monitoring, or other plan for those
819 projects that have unavoidable adverse effects and where existing identification is sufficient to
820 proceed with a treatment plan, or for which further identification is incorporated within the
821 treatment plan. If this determination is reached through Stipulation IV(C)(1)(f)(3), the Trust shall
822 consult with NPS and SHPO on the proposed treatment plan according to the terms of that
823 Stipulation. The proposed plan will include a description of protection measures for unaffected
824 archaeological features, relevant research questions to be answered, methods for data recovery,
825 monitoring during construction, responsibilities and coordination, and the interpretation and
826 curation of recovered materials. The plan will describe the mitigation sufficiently to serve as a
827 scope of work and for the purpose of developing a budget. These reports will be summarized in
828 the Trust's annual report in accordance with Stipulation XIV.

829
830 D. All material remains and associated records generated by such projects, and not subject to
831 NAGPRA, will be accessioned, catalogued, and managed in accordance with 36 C.F.R. Part 79,
832 "Curation of Federally-Owned and Administered Archaeological Collections," the Trust's
833 *Archaeological Collections Policy* and the *Archaeological Collections Management Guidelines*.
834 According to 36 C.F.R. Part 79 "material remains" means artifacts, objects, specimens and other
835 physical evidence that are excavated or removed in connection with efforts to locate, evaluate,
836 document, study, preserve or recover a prehistoric or historic resource.

837 838 **VII. UNANTICIPATED EFFECTS & POST REVIEW DISCOVERY**

839
840 A. If after completion of an undertaking's review pursuant to Stipulation IV(C)(1) through
841 (3), or if during the implementation of any previously reviewed undertaking, the Trust finds it
842 necessary to modify the project scope or construction documents, the DFPO shall determine the
843 necessary compliance pathway to address this modification in accordance with Stipulation IV(C).

844
845 B. The Trust shall utilize its Standard Archaeological Discovery Protocol (see Appendix B)
846 for projects without any anticipated effects; this will be the only condition required prior to
847 implementation. In the event of an archaeological discovery the Trust may assume eligibility for
848 the purposes of treatment for the current undertaking. Should circumstances arise where the Trust
849 cannot address discoveries in a manner consistent with the protocol, the Trust shall notify the
850 SHPO and NPS of the discovery and any project-related time constraints, then agree upon
851 reasonable time frames for consultation. The Trust shall take into account any timely comments
852 prior to making a final decision on treatment. This protocol will describe the Trust's methods to
853 comply with the Archaeological Resources Protection Act (ARPA) and NAGPRA for
854 discoveries.

855 856 **VIII. EMERGENCY RESPONSE**

858 A. In the event that an emergency occurs at the Presidio that affects historic properties, the
859 Trust may take actions without consultation to preserve life or property.

860
861 1. Trust will notify SHPO and NPS within 24 hours of the emergency or as soon as
862 conditions permit.

863
864 2. The Trust will notify the SHPO and NPS of any actions taken to preserve life or
865 property within five days of completing the action.

866
867 3. The Trust will include a summary of the emergency and any actions taken in the
868 Trust's annual report in accordance with Stipulation XIV.

869
870 B. In the event of a disaster or emergency declared by the President or the Governor of
871 California, the Trust can undertake actions involving historic properties to prevent further damage
872 within thirty (30) days from the declaration of the disaster or emergency.

873
874 1. Emergency response work will be conducted in a manner that avoids or
875 minimizes effects on historic properties and, where possible, such emergency measures
876 will be undertaken in a manner that does not foreclose future preservation or restoration.

877
878 2. The Trust shall notify the NPS and SHPO of the emergency within two (2) days
879 of the declaration and include the steps being taken to address the emergency, and shall
880 provide on-site monitoring of emergency response work by qualified personnel (safe
881 working conditions permitting). NPS and SHPO may comment on the proposed steps in
882 order to facilitate the Trust's emergency response plan while also avoiding adverse
883 effects to affected properties.

884
885 3. The Trust will include a summary of the emergency and response taken in the
886 Trust's annual report in accordance with Stipulation XIV.

887
888 4. This timeframe may be extended with approval of the NPS and SHPO.

889
890 C. Actions as part of the recovery of a disaster or emergency shall be reviewed in
891 accordance with Stipulation IV.

892
893 **IX. DISPUTE RESOLUTION**

894
895 Should any signatory or concurring party to this PA object at any time to any actions proposed or the
896 manner in which the terms of this PA are implemented, the Trust shall consult with such party to resolve
897 the objection. If the Trust determines that such objection cannot be resolved, the Trust will:

898
899 A. Notify signatory and concurring parties of the intent to resolve a dispute through the
900 involvement of the ACHP, and forward all documentation relevant to the dispute, including the
901 Trust's proposed resolution, to the ACHP. The ACHP shall provide the Trust with its advice on
902 the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior
903 to reaching a final decision on the dispute, the Trust shall prepare a written response that takes
904 into account any timely advice or comments regarding the dispute from the ACHP, signatories
905 and concurring parties, and provide them with a copy of this written response. The Trust will then
906 proceed according to its final decision.

908 1. If the ACHP does not provide its advice regarding the dispute within the thirty
909 (30) day time period, the Trust may make a final decision on the dispute and proceed
910 accordingly. Prior to reaching such a final decision, the Trust shall prepare a written
911 response that takes into account any timely comments regarding the dispute from the
912 signatories and concurring parties to the PA, and provide them and the ACHP with a
913 copy of such written response.
914

915 2. The Trust's responsibility to carry out all other actions subject to the terms of this
916 PA that are not the subject of the dispute remain unchanged.
917

918 **X. AMENDMENTS**

919
920 A. This PA may be amended when such an amendment is agreed to in writing by all
921 signatories. The amendment will be effective on the date a copy signed by all of the signatories is
922 filed with the ACHP.
923

924 B. Appendices A, B, C or D may be revised with the written agreement of the Trust, SHPO,
925 and NPS without a revision being made to the underlying PA in accordance with an MOA and
926 filed with the ACHP. Any such change will be documented in the Trust's annual report in
927 accordance with Stipulation XIV.
928

929 **XI. TERMINATION**

930
931 A. Only a signatory party may terminate this PA. If any signatory party proposes
932 termination of this PA, the signatory party proposing termination shall notify all other signatories
933 in writing, explain the reasons for proposing termination, and consult with the other signatories
934 for no more than thirty (30) days to seek alternatives to termination. Should such consultation
935 result in an agreement on an alternative to termination, then the signatories shall proceed with an
936 amendment to the agreement.
937

938 B. If within thirty (30) days (or another time period agreed to by all signatories) an
939 amendment cannot be reached, any signatory may terminate the PA upon written notification to
940 the other signatories.
941

942 C. Once the PA is terminated, and prior to work continuing on an undertaking, the Trust
943 must either (a) execute a Memorandum of Agreement pursuant to 36 C.F.R. § 800.6, or (b)
944 request, take into account, and respond to the comments of the ACHP under 36 C.F.R. § 800.7.
945 The Trust shall notify the signatories as to the course of action it will pursue.
946

947 **XII. DURATION**

948
949 A. This PA shall become effective upon execution by the Trust, the SHPO, the NPS, and the
950 ACHP and shall remain in effect until December 31, 2024, or unless terminated prior to that time
951 in accordance with Stipulation XI, or unless it is extended for an additional period of time by
952 mutual written agreement of the signatory parties.
953

954 **XIII. DEFINITIONS**

956 A. The definitions of terms appearing at 36 C.F.R. § 800.16 are incorporated by reference
957 into this PA.

958

959 **XIV. ANNUAL REVIEW AND MONITORING**

960

961 A. On or before January 31st of each year so long as this PA is in effect, the Trust shall
962 prepare and provide to all parties an annual report describing how the Trust is carrying out its
963 responsibilities under this PA.

964

965 B. The Trust shall ensure that the Report is made available to the public and that potentially
966 interested persons and members of the public are invited to provide comments to the SHPO, NPS,
967 and the ACHP as well as to the Trust. At the request of the SHPO, NPS, or the ACHP, the Trust
968 shall supplement this process through meeting(s) to address comments and/or questions.

969

970 C. The Report shall include, at a minimum:

971

972 1. A list of all undertakings reviewed under Stipulation IV.

973

974 2. Efforts to identify and/or evaluate potential historic properties, monitoring
975 efforts, AMA or research designs, and treatment of historic properties.

976

977 3. Reports of any training given to Trust personnel pursuant to Stipulation II,
978 identification of current Trust points of contact, and notification of any qualified
979 personnel changes.

980

981 4. Any recommendations to amend this PA or improve communications among the
982 parties.

983

984 D. The SHPO and NPS may monitor activities carried out pursuant to this PA, and the
985 ACHP will review such activities if it deems necessary or is so requested. The Trust shall
986 cooperate with the SHPO, NPS and the ACHP in carrying out their monitoring and review
987 responsibilities.

988

989 **EXECUTION** of this PA by the Trust, SHPO, NPS, and the ACHP and implementation of its terms
990 evidence that the Trust has taken into account the effects of this undertaking on historic properties and
991 afforded the ACHP an opportunity to comment.

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**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**

SIGNATORY PARTY:

THE PRESIDIO TRUST

Name:



Title: Executive Director

Date: April 23, 2014

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**PROGRAMMATIC AGREEMENT
AMONG THE PRESIDIO TRUST, NATIONAL PARK SERVICE,
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION,
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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**

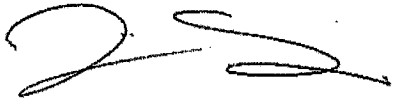
SIGNATORY PARTY:
NATIONAL PARK SERVICE: PACIFIC WEST REGION

Name: *Cristina Flynn - Christine Lehman*
Title: *Reg. Dir. DMRCB*
Date: *4/24/2014*

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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

SIGNATORY PARTY:
CALIFORNIA STATE HISTORIC PRESERVATION OFFICER



Name: Jenan Saunders
Title: Deputy State Historic Preservation Officer
Date: April 25, 2014

1063 PROGRAMMATIC AGREEMENT
1064 AMONG THE PRESIDIO TRUST, NATIONAL PARK SERVICE,
1065 THE ADVISORY COUNCIL ON HISTORIC PRESERVATION,
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1069 VARIOUS OPERATION AND MAINTENANCE ACTIVITIES
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1071 THE PRESIDIO OF SAN FRANCISCO NATIONAL HISTORIC LANDMARK DISTRICT,
1072 GOLDEN GATE NATIONAL RECREATION AREA
1073 SAN FRANCISCO, CALIFORNIA
1074
1075

1076 SIGNATORY PARTY:

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1078 ADVISORY COUNCIL ON HISTORIC PRESERVATION
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1082
1083 Name: John W. Fowler
1084 Title: EXECUTIVE DIRECTOR
1085 Date: 4/29/14

1086 **APPENDIX A**

1087 **REPETITIVE OR LOW IMPACT ACTIVITIES**

1088 The following projects are exempt from further review or consultation with the SHPO, NPS, and the
1091 ACHP under the terms of this PA.

- 1092
- 1093 A. Maintenance of contributing buildings and structures which includes:
- 1094
- 1095 1. Housekeeping, routine maintenance, building monitoring, and other such actions
1096 (such as repair/replacement of light switches, and rewiring existing fixtures in existing
1097 conduit, replacement of window putty) that do not damage historic fabric.
- 1098
- 1099 2. Painting of historic structures (exterior and interior) to match existing color,
1100 consistent with approved Residential Paint Palette, or based on paint analysis by an
1101 architect or exhibit specialist.
- 1102
- 1103 E. Maintenance operations for non-contributing buildings and structures in a historic
1104 district, except excavations and borings in archaeologically sensitive areas.
- 1105
- 1106 F. Painting of non-historic buildings and structures (exterior and interior).
- 1107
- 1108 G. Maintenance and repair or replacement of roofs or parts of a roof on historic and non-
1109 historic structures that are deteriorated beyond repair, when replacement matches existing or
1110 original material and design, and the Secretary's Standards, or maintenance scope of work that
1111 does not alter the integrity of the historic material.
- 1112
- 1113 H. Grading of terrain adjacent to a building to achieve positive water runoff in areas not
1114 designated as archaeologically sensitive or having vegetation or other characteristics which
1115 contribute to the cultural landscape and would be affected by grading.
- 1116
- 1117 I. Routine grounds maintenance such as grass cutting and treatment, maintenance of shrubs,
1118 and tree trimming, provided these activities are consistent with the Vegetation Management Plan
1119 and preservation of the cultural landscape.
- 1120
- 1121 J. Maintenance of existing roads or existing parking areas, including repaving and grading,
1122 within previously disturbed areas, where the work does not affect the historic integrity and
1123 character defining features of roads that are historic properties.
- 1124
- 1125 K. Rehabilitation, maintenance, or replacement of utility lines, transmission lines, and non-
1126 historic fences and walls within previously disturbed areas, not including known archaeological
1127 sites.
- 1128
- 1129 L. Health and safety activities such as non-destructive testing for radon gas, asbestos, lead-
1130 based paint, lead pipes, and hazardous materials and wastes.
- 1131
- 1132 M. Conducting non-ground disturbing elements of the applicable Integrated Pest
1133 Management program for control of pests such as termites, insects, and rodents.
- 1134

- 1135 N. Maintenance of existing facilities that does not involve new or additional ground
1136 disturbance (e.g., maintenance or replacement of guard rails, barriers, traffic control devices, light
1137 fixtures, non-historic curbs and sidewalks).
1138
- 1139 O. Maintenance (that does not change the configuration or appearance of the existing
1140 facilities) of existing electronic communication sites involving no ground disturbance.
1141
- 1142 P. Drilling test wells outside the boundaries of known archaeological sites for such purposes
1143 as water, slope stability, and detection of contaminants when continuous core sample is submitted
1144 to archaeology lab.
1145
- 1146 Q. Mitigation or abatement of hazardous materials where this can be accomplished without
1147 impact to historic integrity or character-defining features of historic properties in situations such
1148 as the following:
1149
- 1150 1. Removal of asbestos insulation from piping and around duct work in open areas;
1151
 - 1152 2. Removal of damaged asbestos floor tile and replacement with similar non-
1153 asbestos tile;
1154
 - 1155 3. Carpeting over damaged asbestos floor tiles which do not contribute to the
1156 historic significance of a structure;
1157
 - 1158 4. Encapsulation of lead-based paint in window trim and molding where there is no
1159 change to appearance.
1160
- 1161 R. Conducting small-scale and select destructive testing in contributing buildings to expose
1162 and assess concealed structural conditions (such as removal of small areas of plaster wall finish)
1163 and/or to assess material capacities (such as masonry push testing or concrete slab coring) when
1164 performed in areas that are easily repairable or otherwise inconspicuous.

1165 **APPENDIX B**

1166 **STANDARD ARCHAEOLOGICAL DISCOVERY PROTOCOL**

1167
1168
1169
1170 A. There are three types of discoveries that are covered by this protocol:

- 1171
1172 1. Human remains of Native American or other derivation.
1173
1174 2. Cultural resources that have the potential to be significant.
1175
1176 3. Cultural resources not requiring further consideration.
1177

1178 B. An unanticipated discovery refers to any situation where previously unidentified
1179 archaeological resources or human remains are encountered during ground-disturbing activities.
1180 Unanticipated discovery protocols apply to those archaeological finds that are exposed during
1181 construction or construction-related activities whether an archaeologist is present or not. All
1182 contractors will immediately report to the Trust archaeologist if archaeological materials are
1183 uncovered during construction activities. All contractors must cease operations within the vicinity
1184 of the find until the Trust archaeologist is consulted. Cultural materials should be avoided by all
1185 future project activities and protected in place until a decision about their potential significance
1186 can be made. The Trust may assume NHL or NRHP eligibility of inadvertently discovered
1187 archaeological features for purposes of this treatment. All materials are property of the Trust and
1188 are not to be taken for personal use or display. The removal of artifacts from federal land is a
1189 federal offense and can result in substantial fines and/or imprisonment.
1190

1191 C. Archaeological resources include, but are not limited to, stone, brick, and concrete
1192 building foundations, isolated historic artifacts, historic privy pits and household waste deposits,
1193 and items of Native American derivation such as stone tools, shell and animal bone waste, shell
1194 beads, and habitation areas. A more detailed list follows:

- 1195
1196 1. Human remains;
1197
1198 2. Concentrations of rock, ash, animal bone or shell;
1199
1200 3. Buried layers containing a dark, almost black or very dark brown soil often
1201 containing charcoal and shell fragments;
1202
1203 4. Concentrations of artifacts such as stone bowls, arrowheads, bone tools, shell
1204 beads, etc.;
- 1205
1206 5. Architectural foundations made of stone, brick, wood, or concrete;
1207
1208 6. Architectural fabric;
1209
1210 7. Concentrations or historic material such as fragments of glass bottles, ceramic
1211 dishes, old cans, metal hardware, or other obvious trash dumps;
1212
1213 8. Pockets of debris containing food remains (e.g. cut bone, seeds, pits); and
1214

1215 9. Other materials that do not qualify as archaeological resources might also be
1216 encountered. These include: subsurface utilities such as water or sewer lines, materials
1217 manufactured after 1950, and small concentrations of broken concrete, broken asphalt,
1218 modern aluminum cans or beer bottles, and/or unmarked, unmortared bricks that have
1219 been deposited as fill, if no other cultural materials are present. These are generally not
1220 considered significant finds but should be brought to the Trust archaeologist's attention to
1221 inform future oversight.
1222

1223 D. Human Remains
1224

1225 1. All project-related ground-disturbing activities at the Presidio are designed to
1226 avoid human remains. If human remains, funerary objects, sacred objects, or objects of
1227 cultural patrimony are inadvertently discovered they shall be protected in place and
1228 avoided by all project activities. Ground disturbing work in the vicinity of the find must
1229 immediately cease and the Trust archaeologist must be contacted. Presidio Archaeology
1230 Lab staff will notify the Trust's DFPO. If necessary, the Trust will notify the San
1231 Francisco Medical Examiner of the inadvertent discovery of human remains.
1232

1233 2. The immediate protection of human remains at the site shall be accomplished by
1234 a) keeping any discovery confidential, and
1235 b) securing the location to prevent disturbance of the remains and any
1236 associated materials.
1237
1238

1239 3. The Trust archaeologist shall determine whether NAGPRA applies to the
1240 discovery and will ensure that the finds are treated in compliance with all requirements
1241 outlined at 43 C.F.R. § 10.4. Any materials not subject to NAGPRA will remain under
1242 Federal control.
1243
1244

1245 4. The Trust archaeologist shall determine whether the human remains are a single
1246 isolated burial or are potentially part of a cemetery or a larger archaeological site. This
1247 may necessitate the involvement of a consulting physical anthropologist. Articulated
1248 human remains, either as part of a single burial or larger cemetery, will be protected in
1249 place and avoided by all project activities. This may involve abandonment or redesign of
1250 the project.
1251

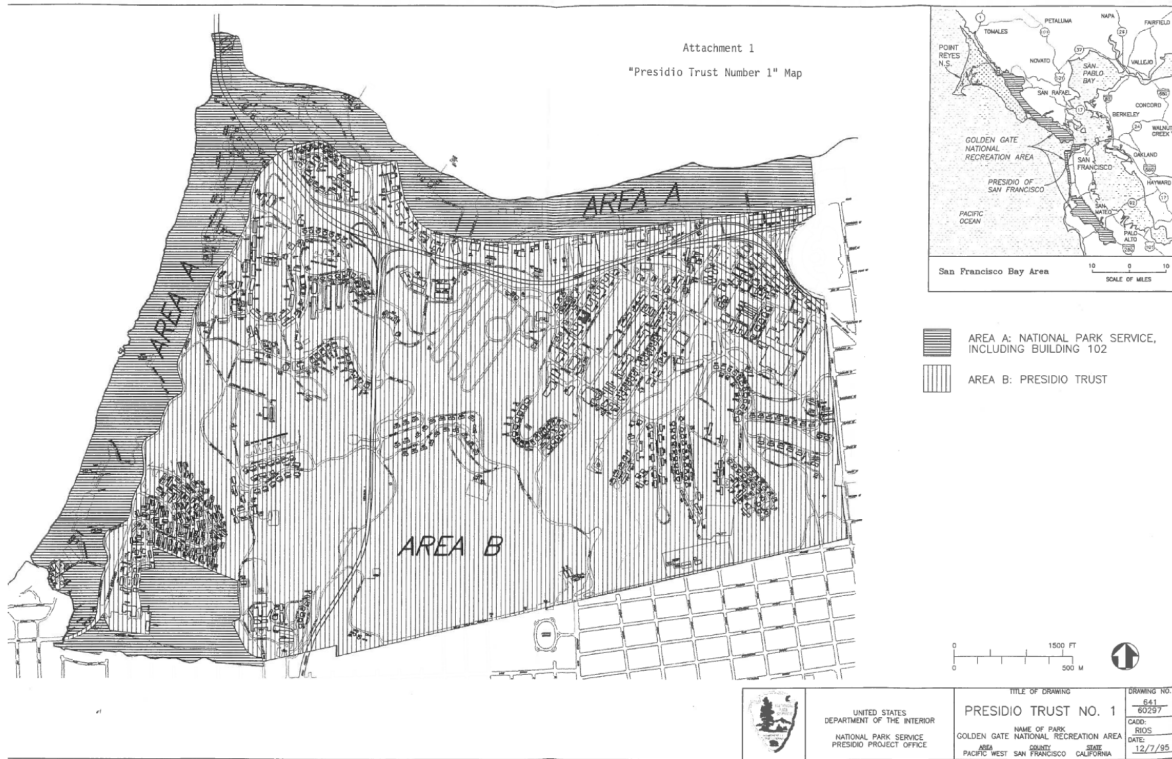
1252 5. If the discovery is limited to disarticulated human remains, the Trust
1253 archaeologist or a consulting physical anthropologist will direct necessary collection
1254 efforts. Further identification work may be necessary to determine the frequency of
1255 disarticulated human remains in the project area, and to determine an appropriate course
1256 of action. Any disarticulated remains collected from the site will be stored in archival
1257 boxes in a secure location until appropriate re-interment can take place. No human
1258 remains will be accessioned into the Presidio Trust Archaeological Collections.
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APPENDIX C

AREA OF POTENTIAL EFFECT

“Presidio Trust Number 1,” dated December 7, 1995



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APPENDIX D

ARCHAEOLOGICAL AREAS OF THE NHLD

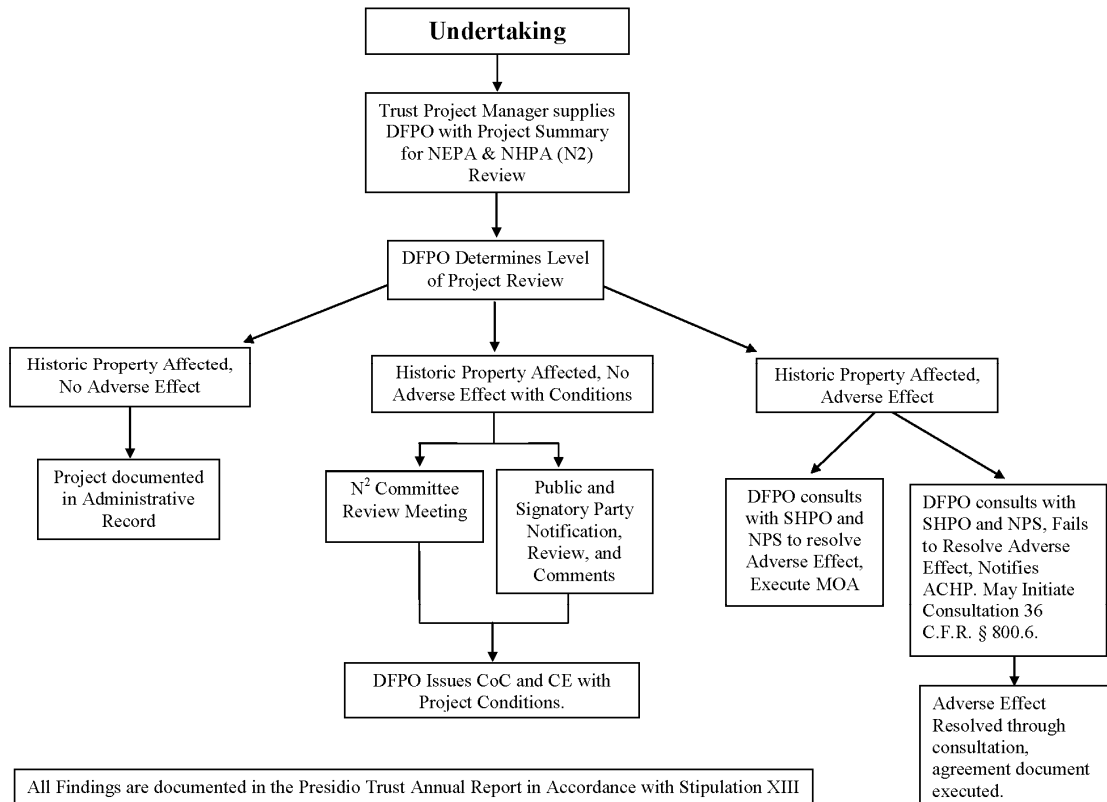


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APPENDIX E
N² REVIEW PROCESS

The Presidio Trust N² Process



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APPENDIX F

LIST OF PARTIES NOTIFIED DURING THE CONSULTATION PROCESS (May – December 2013)

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Concurring Parties to the 2002 PTPA, notified, comments requested on May 24, 2013 and November 15, 2013:

National Trust for Historic Preservation
Presidio Historical Association

Participating Parties to the 2011 Main Post Update PA, notified and invited to participate August 26, 2013:

National Trust for Historic Preservation
Presidio Historical Association
San Francisco Architectural Heritage
People for a Golden Gate National Recreation Area
National Parks Conservation Association
Sierra Club
Decendants of the de Anza and Portola Expedition
Neighborhood Associations for Presidio Planning
Cow Hollow Association
Laurel Heights Improvement Association
Marina Community Association
San Francisco Film Society
Interfaith Center at the Presidio

eNews Announcements to 9,000 subscribed members of the public on July 12, 2013 and November 20, 2013, notifying them of the process and inviting comment

Appendix B: N² Forms



PLEASE SUBMIT TO:
103 Montgomery Street
San Francisco, CA 94129
planningreview@presidiotrust.gov

PLANNING REVIEW

N² • DESIGN REVIEW • PERMITTING

PROJECT SUBMITTAL FORM

Project Managers should file this form when submitting projects for Planning Review. Please fill out the form, attach the supporting information, and send your submission to *planningreview@presidiotrust.gov*

SUBMITTAL DATE:

A. PROJECT INFORMATION

PROJECT TITLE:

PROJECT LOCATION:

PROPOSED START DATE:

PROPOSED COMPLETION DATE:

PROJECT MANAGER / TITLE:

TRUST DEPARTMENT:

PHONE NUMBER:

EMAIL ADDRESS:

B. PROJECT DESCRIPTION

Describe the proposed project in a way that will be meaningful to Trust Directors, the public and other reviewing agencies. State the underlying purpose of the project, what the project hopes to accomplish, and how it would be implemented. Focus on the major areas of importance (objectives, location, proposed actions, technical characteristics, methods and/or consequences). Use clear and simple language to promote understanding and do not supply extensive detail beyond that needed for initial evaluation. Go to the end of this form for a sample project description.

C. SUPPORTING INFORMATION

Provide a project location map and the following attachments as applicable. Check below if content is included.

Site plan

Correspondence

Design and/or construction drawings

Other (specify):

Photographs, graphics or other images

D. CONSULTATION

Early consultation with Planning Review staff and others will expedite the review process. Describe below communication with Trust resource specialists or input from outside agencies or experts. Any potential environmental impacts, areas of controversy or issues raised by agencies and the public must be discussed with the relevant staff specialist.

**SUBMITTAL CHECKLIST
(TO BE COMPLETED BY PLANNING REVIEW STAFF)**

N/A REQUESTED RECEIVED

PR	Planning review coordination meeting			
N²	Completed Project Scening Form			
	Schematic Design Documents (if requested to support N2 review)			
DESIGN REVIEW	<i>ADMINISTRATIVE DESIGN REVIEW</i> Schematic Design Review (see Schematic Design Submittal Requirements)			
	<i>MAJOR DESIGN REVIEW</i> Schematic Design Review (see Schematic Design Submittal Requirements)			
	Design Development Review (see Design Development Submittal Requirements)			
	Construction Documents Review (see Construction Documents Submittal Requirements)			
PERMITTING	Building Permit Application (includes Health & Food Facility/Demolition/deferred submittals)			
	Construction Permit Application			
	Excavation Permit Application			
	Encroachment Permit Application			
	Grading Permit Application			

SAMPLE PROJECT DESCRIPTION

Use the prompts below.

A [state project lead, such as tenant or Trust department] will [state area or resource that will be affected, such as building or landscape unit] in order to [state primary project objectives, such as introduction of new uses, fix something that is broken, or principal problem the project addresses]. (List important items that comprise the scope of work, noting types of changes proposed for interior or exterior spaces, details of events, notification or coordination conducted.)

Sample: A new tenant (Little Bee School) will make improvements to historic building 9 (Officer Family Housing, 1862) to accommodate a new use as a preschool. Interior improvements will include installing four kid toilets and kid-height sinks. Three of the toilets and sinks will be installed in the downstairs bathroom on the north side of the building, requiring the removal of an existing toilet and radiator. The fourth toilet and sink will be installed in a closet on the first-floor north side of the building. Kid bathroom doors will be removed and stored on site. The new toilets and sinks will require additional vents on the building’s exterior. The outdoor space behind the building will be enclosed with a 4-foot high fence (matching the fence at building 4) to meet preschool licensing requirements.

TO BE COMPLETED BY PLANNING REVIEW STAFF	PLANNING REVIEW	No Meeting Recommended		Meeting Recommended	
	N²	No Review Required	Note to File	Admin Review	Full Review
	DESIGN REVIEW	No Review Required	Note to File	Admin Review	Full Review
	PERMITTING	No Permit Required		Permit(s) Required	



PLEASE SUBMIT TO:
 Historic Compliance Coordinator
 103 Montgomery Street
 San Francisco, CA 94129
 compliance4@presidiotrust.gov
 415-561-5062

PLANNING REVIEW

N² • DESIGN REVIEW • PERMITTING

NEPA / NHPA (N²) PROJECT SCREENING FORM

The filing of this Project Screening Form is in compliance with Section 1010.1(a) of the Presidio Trust’s Regulations implementing the National Environmental Policy Act (NEPA) and Section IV.C.1. of the 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, Golden Gate National Recreation Area, and pursuant to Section 106 of the National Historic Preservation Act (NHPA). To access this form and other N² compliance information, go to <https://presidiotrust.sharepoint.com/sites/resources/Pages/N-Squared.aspx>.

PROJECT INFORMATION

PROJECT TITLE:

TRUST DESIGNATED REPRESENTATIVE:

PHONE NUMBER:

EMAIL ADDRESS:

TO BE COMPLETED BY N2 ADMINISTRATOR	SUBMITTAL DATE:	PROJECT NO.:	NEPA	NHPA
--	-----------------	--------------	------	------

A. PROJECT COORDINATION

Are there other coordinated public, Trust or interagency review requirements necessary to implement the project? Discuss below all items checked yes. Would the project:

- | | | |
|---|-----|-----|
| 1. Require a Building Permit and/or an Excavation Clearance?
<i>Explain:</i> | YES | NO |
| 2. Require outside review/consultation (California Environmental Quality Act, Regional Water Quality Control Board, U.S. Fish and Wildlife Service, Native American tribes, etc.)?
<i>Explain:</i> | YES | NO |
| 3. Be within Area A or have the potential to affect Area A lands, and require National Park Service notification?
<i>Explain:</i> | YES | NO |
| 4. Disturb soil in the drip line of a building?
If so, has the remediation program for lead-based paint soil? been initiated?
<i>If unknown, consult the Remediation Project Manager at 561-5421</i>
<i>Explain:</i> | YES | NO |
| | N/A | YES |
| | YES | NO |
| 5. Generate controversy or questions from the public, and hence require public outreach, education or notice?
<i>Explain:</i> | YES | NO |

- | | | |
|---|-------------------|------------------|
| <p>6. Be within an environmental land use control zone?
 <i>If unknown, consult the N² Administrator at 561-5062</i>
 Explain:</p> | <p>YES</p> | <p>NO</p> |
| <p>7. Have design components (such as aesthetic/visual features, architectural/interior design elements, designed landscape components or special maintenance/sustainability considerations) that do not give rise to potential environmental effects, but may require additional review?
 <i>If unknown, consult the Design Review Committee Coordinator at 561-5433</i>
 Explain:</p> | <p>YES</p> | <p>NO</p> |
| <p>8. Implement or terminate a restriction, condition, public use limit or closure, requiring a written determination by the Board or Chief Executive Officer justifying the action?
 <i>If unknown, consult the Compliance Manager at 561-5365.</i>
 Explain:</p> | <p>YES</p> | <p>NO</p> |

B. ALTERNATIVES CONSIDERED

Describe below all alternatives considered including timing, cost, potential environmental effects and/or logistical issues that influenced the rejection of each alternative. “No Action” should always be one alternative considered.

C. CONSULTATION

Early consultation with the N2 and resource staff will expedite the review process. Describe below communication with Trust resource specialists or input from outside agencies or experts. Any potential environmental impacts identified must be discussed with the relevant staff specialist.

D. RESOURCE EFFECTS TO CONSIDER

Yes answers must be accompanied by an explanation of how the potential impact will be avoided. Justify no answers with an explanation when needed. Attach additional sheets as necessary. Would the project:

- | | | |
|---|-------------------|------------------|
| <p>1. Alter, destroy, disturb or remove any portion of historic structures, archaeological resources, cultural landscape features or other contributors to the National Historic Landmark District (NHLD)?
 <i>If unknown, consult the Historic Compliance staff at 561-2758 or 561-5062.</i>
 Explain:</p> | <p>YES</p> | <p>NO</p> |
| <p>2. Introduce elements out of character with the NHLD?
 <i>If unknown, consult the Historic Compliance staff at 561-2758 or 561-5062.</i>
 Explain:</p> | <p>YES</p> | <p>NO</p> |
| <p>3. Substantially alter any ground cover or vegetation? Affect a species of special concern (plant or animal; state or federal listed or proposed for listing) or essential or important habitat?
 Explain:</p> | <p>YES</p> | <p>NO</p> |
| <p>4. Attract animal or insect pests or introduce or promote non-native species (plant or animal)?
 Explain:</p> | <p>YES</p> | <p>NO</p> |
| <p>5. Inhibit surface water drainage, alter the landscape topography, lead to increased runoff or erosion or compromise slope stability?
 Explain:</p> | <p>YES</p> | <p>NO</p> |
| <p>6. Involve handling, storage or disposal of potentially hazardous substances (such as toxic substances, flammables or explosives)?
 Explain:</p> | <p>YES</p> | <p>NO</p> |
| <p>7. Degrade surface or ground water quality? Alter streamflow characteristics?
 Explain:</p> | <p>YES</p> | <p>NO</p> |
| <p>8. Affect wetland, riparian or coastal habitat?
 Explain:</p> | <p>YES</p> | <p>NO</p> |
| <p>9. Be inconsistent with existing or formally proposed land use plans or policies (Presidio Trust Management Plan, Vegetation Management Plan, Trails and Bikeways Plan, etc.)?
 <i>If unknown, consult the Compliance Manager at 561-5365.</i>
 Explain:</p> | <p>YES</p> | <p>NO</p> |

- | | | |
|--|------------|-----------|
| <p>10. Impact recreation resources (visitation, activities, etc.) or visitor access (parking, trails, roads, etc.)?
<i>Explain:</i></p> | <p>YES</p> | <p>NO</p> |
| <p>11. Greatly increase the demand for parking?
<i>Explain:</i></p> | <p>YES</p> | <p>NO</p> |
| <p>12. Substantially increase traffic congestion, traffic volume, or adversely affect traffic safety for vehicles, pedestrians and bicyclists?
<i>Explain:</i></p> | <p>YES</p> | <p>NO</p> |
| <p>13. Substantially increase vehicle emissions or emissions of other air pollutants? Generate nuisance dust or odors?
<i>Explain:</i></p> | <p>YES</p> | <p>NO</p> |
| <p>14. Perceptibly increase existing noise levels or expose people to loud noise?
<i>Explain:</i></p> | <p>YES</p> | <p>NO</p> |
| <p>15. Substantially increase the amount of energy or water used?
<i>Explain:</i></p> | <p>YES</p> | <p>NO</p> |
| <p>16. Substantially increase the amount of solid waste or litter generated?
<i>Explain:</i></p> | <p>YES</p> | <p>NO</p> |
| <p>17. Increase light or glare?
<i>Explain:</i></p> | <p>YES</p> | <p>NO</p> |
| <p>18. Block an existing view, be visually intrusive or contribute to a degraded visual condition?
<i>Explain:</i></p> | <p>YES</p> | <p>NO</p> |
| <p>19. Maintain or create a public or employee safety or health hazard, or an attractive nuisance?
<i>Explain:</i></p> | <p>YES</p> | <p>NO</p> |
| <p>20. Substantially increase demand for municipal services (police, fire, water, sewage, etc.)?
<i>Explain:</i></p> | <p>YES</p> | <p>NO</p> |

Appendix C: Presidio Trust Secretary of the Interior Qualified Staff Resumes

Appendix D: Archaeological Management Assessments

**ARCHAEOLOGICAL MANAGEMENT ASSESSMENT
EAST MASON WAREHOUSES REHABILITATION**

Prepared by

Kari Jones
Historic Compliance -Cultural Resources
Presidio Trust

Prepared for

Genny Bantle
Associate Director of Building and Landscape Rehabilitation
Presidio Trust

November 2021

ARCHAEOLOGICAL MANAGEMENT ASSESSMENT

EAST MASON WAREHOUSES REHABILITATION

I. Background

In accordance with Stipulation VI (Archaeology) of the “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,” archaeological properties shall be handled in accordance with the terms of an Archaeological Management Assessment (AMA) that is prepared for individual undertakings or groups of related undertakings.

II. Project Description

The East Mason Street Warehouses (buildings 1182 through 1188) comprise a distinctive row of seven mostly identical structures constructed concurrently in 1917-1919 as a warehouse complex. The NHLDC-contributing buildings, which align with Mason Street at the Marina Gate, have undergone some prior alterations and are in fair condition. This project will fully rehabilitate the buildings and associated site area for office/commercial occupancy. The project will result in fully rehabilitated and structurally upgraded “warm shell” buildings. The project will add new decking in select areas between buildings, differentiated by construction details, to consolidate ADA access and create access to building entrances and serve as open-air common spaces for tenants. The decks will feature modest site furnishings and plantings. Trash and mechanical equipment enclosures will be constructed on the parking lot (south) side of the building complex. The seismic design will involve construction of grade beams in the crawl space underneath the buildings to tie together structural posts as well as additional shear improvements at the interior face of the perimeter walls. Site work is under design at the time of the preparation of this AMA. This Archaeological Management Assessment is based on the 100% Design Development documents dated August 8, 2021. Any subsequent modifications to these drawings may be subject to additional archaeological oversight and should be discussed with Trust Archaeology staff.

III. Archaeological Context

There are no known National Historic Landmark District-contributing archaeological features in the East Mason Warehouses Rehabilitation Project Area. The area is, however, considered to have some sensitivity for precontact cultural materials (i.e. Native Ohlone features and artifacts) based on modeling completed by the Presidio Archaeology Lab (Barnaal 2009).

Archaeological site CA-SFR-129 is immediately to the north of the East Mason Warehouse Project Area in Area A. The character of CA-SFR-129 is consistent with Jones’s (1992) interpretation of late precontact settlement patterns. According the model, Presidio marshlands would have been used logistically over the last 1,000 years, primarily for the procurement of shellfish and plant resources. If the mouths of freshwater creeks and adjacent bluff margins, the slough corridor, and dunes were good places for aboriginal occupation, it is possible that prehistoric sites buried deeply within the project area may occur south of CA-SFR-129 along the former creek margins. It is also possible that other, smaller logistical use sites occur near CA-SFR-129. Archaeological deposits associated with the precontact occupation of the Presidio are expected to be buried below historic fill brought in to fill the marshlands and their margins.

Subsurface geoarchaeological testing conducted in January 2006 as part of the corrective action plan for an adjacent environmental remediation project (Buildings 228, 230, and [former] 231) did not identify any archaeological deposits, but did find evidence of at least two buried Holocene soils (Daldorf et al. 2006). These buried soil horizons were predicted to have a moderate potential for precontact archaeological deposits. Geoarchaeological testing also confirmed the predictions of the Presidio Elevation Change Model (Blind and Barnaal 2008) by demonstrating that the remediation area was covered by six to ten feet of historic-era fill. Archaeological monitoring of remedial excavation in summer 2012 confirmed the presence of historic fill to depths below 10 feet. No native ground surfaces were observed in an excavation of between 10 and 11 feet below ground surface.

Archaeological testing (Jones and Stokes 2002; GANDA 2013) and geoarchaeological modeling (GANDA 2013) for the Doyle Drive Project further suggests that the potential to locate precontact deposits in the project area is low. Results indicated that there is very little potential for Holocene-era surfaces outside of CA-SFR-129 and CA-SFR-6/26. Stable Holocene-era terrestrial surfaces would have been necessary to support long-term precontact occupation. Extensive archaeological monitoring of ground disturbance across the APE for the Doyle Drive project also did not identify any additional precontact deposits.

IV. Assessment

While the area is predicted to have some sensitivity for buried precontact archaeological sites, no historic or precontact sites are known to be within the area of the proposed action. The original construction of the buildings in this area, along with ground disturbance for site infrastructure, may have already impacted buried archaeological sites, affecting their physical integrity. The Presidio Elevation Change Model suggests that up to 10 feet of historic-era fill has been deposited over native ground surface at the western elevations of Buildings 1184 and 1185 and up to five feet of fill exists at the south elevation of Building 1184. Elevation change in the remaining area is predicted to be minimal. Archaeological monitoring of adjacent improvements for the Doyle Drive project has not revealed any buried subsurface archaeological remains outside of the previously identified adjacent archaeological site of CA-SFR-129.

Ground disturbance for the proposed East Mason Warehouses Rehabilitation is minimal and will be restricted to excavation for building and seismic upgrades and shallow site work. Because of the residual potential of ground disturbing activities to impact potentially buried archaeological sites, archaeological consultation will be included in all phases of design and implementation. If the proposed action requires more extensive ground disturbance, archaeological testing prior to construction may be necessary. Archaeological monitoring of ground disturbance will further ensure that any archaeological resources present in the project area are identified and treated appropriately. An Archaeological Monitoring Plan (AMP) will be prepared when the construction drawings issued for permit are completed.

Human remains

Project-related ground-disturbing activities will be designed to avoid human remains. If human remains, funerary objects, sacred objects, or objects of cultural patrimony are inadvertently discovered they shall be **protected in place** and **avoided** by all project activities. Ground disturbing work in the vicinity of the find must immediately cease and the Presidio Trust archaeologist must be contacted. Presidio Archaeology Lab staff will notify the Presidio Trust's Federal Preservation Officer. If necessary, the Presidio Trust will notify the San Francisco Medical Examiner of the inadvertent discovery of human remains.

The immediate protection of human remains at the site shall be accomplished by (1) keeping any discovery confidential, and (2) securing the location to prevent disturbance of the remains and any associated materials.

The Presidio Trust archaeologist shall determine whether the Native American Graves Protection and Repatriation Act (NAGPRA) applies to the discovery and will ensure that the finds are treated in compliance with all requirements outlined at 43 CFR 10.4. Any materials not subject to NAGPRA will remain under Federal control.

The Presidio Trust archaeologist shall determine whether the human remains are a single isolated burial or are potentially part of a cemetery or a larger archaeological site. This may necessitate the involvement of a consulting physical anthropologist. Articulated human remains, either as part of a single burial or larger cemetery, will be **protected in place** and **avoided** by all project activities. This may involve abandonment or redesign of the project.

If the discovery is limited to disarticulated human remains, the Presidio Trust archaeologist or a consulting physical anthropologist will direct necessary collection efforts. Further identification work may be necessary to determine the frequency of disarticulated human remains in the project area and to determine an appropriate course of action. Any disarticulated remains collected from the site will be stored in archival boxes in a secure location until appropriate re-interment can take place. No human remains will be accessioned into the Presidio Trust Archaeological Collections.

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**ARCHAEOLOGICAL MANAGEMENT ASSESSMENT AND MONITORING
PLAN
VERIZON CELL SITE #27 A-D
SPORTS BASEMENT**

Prepared by

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Planning and Compliance
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ARCHAEOLOGICAL MANAGEMENT ASSESSMENT AND MONITORING PLAN

VERIZON CELL SITE #27 A-D

SPORTS BASEMENT

I. Background

In accordance with Stipulation VI (Archaeology) of the “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,” archaeological properties shall be handled in accordance with the terms of an Archaeological Management Assessment (AMA) that is prepared for individual undertakings or groups of related undertakings. An Certificate of Compliance (COC) for the Verizon Cell Site #27 A-D Project has been issued by the Presidio Trust. It specifies archaeological monitoring as a compliance measure. This AMA includes the project-specific monitoring plan (MP).

II. Project Description

Four separate temporary monopoles located east of building 610 (Sports Basement) need to be relocated. This project will remove the four monopoles and replace them with two 55-foot monopoles to the west of the building. The project will allow the carriers (Verizon, Sprint, AT&T and T-Mobile) to maintain their current coverage along the Presidio Parkway as well as areas south of the tower locations. Each monopole will provide enough space for two carriers. The foundation will include 18 cell blocks (each measuring 7 feet by 7 feet by 2 feet) to support the construction and installation of both monopoles and all ground equipment. Fiber and power to the site will share a joint trench approximately 490 feet long and 3 feet deep. A six-foot tall chain-link fence will be installed around the cell blocks. One contractor will be responsible for all work relative to the construction of the monopoles and the utility infrastructure. After construction is complete and the site is operational, the licensed area will remain an unmanned facility that requires regular maintenance.

This Archaeological Management Assessment and Monitoring Plan is based on the “Issued for Review” drawings dated 8/22/2018. Any subsequent modifications to these drawings may be subject to additional archaeological oversight and should be discussed with Trust Archaeology staff.

III. Archaeological Context

The Ohlone Mound archaeological area (CA-SFR-6/26) is a *known* precontact archaeological site adjacent to the Project Area. UC Berkeley researchers discovered the mound along the marshland of the Presidio during the preparation to fill the marsh for the Panama Pacific Exposition of 1915. Llewellyn Loud conducted a salvage excavation on what he named SFr-6 or "Presidio Mound" site in September of 1912. He recovered a large quantity of animal bone, lithics, and soil samples, which are currently housed at the Hearst Museum of Anthropology at UC Berkeley. Loud alerted the Panama Pacific International Exposition staff of the discovery and recommended folding the site into their planning for the 1915 event. His petition was ignored, and the mound was buried in preparation for the event. Subsequent

landscape modifications added more fill and approximately six feet of fill now covers the mound recorded in 1912.

In September 1972, Michael Moratto and Rodger Heglar were called to the Presidio of San Francisco at the request of the US Army to investigate the discovery of an apparently ancient human skeleton. The discovery was believed to be located close to CA-SFR-6. Because the previously established site boundaries were unclear, the interment and associated material was given a new site designation- CA-SFR-26. The skeleton was found 250 cm below modern surface in a pit being excavated for the construction of a new hoist for the Motor Pool Compound (former Building 628). The base of the excavation was below the water table, making excavation archaeological difficult.

A clean stratigraphic vertical profile was acquired from the south wall and six clear strata were identified. The skeletal remains were discovered in the earliest (deepest) stratum that consisted of wet, brown, muddy sand. Small numbers of *Macoma nasuta* shells and rotting fibers, which appeared to be parts of aquatic plants, were also found at the top the same stratum.

The human remains and part of the matrix were removed from the excavation. It was later determined that the human remains were of an Indigenous woman, age 25-30 years. Radiocarbon analysis dated the remains to about 740 AD. According to National Park Service archaeologist Leo Barker, the skeleton and an associated bone whistle fragment were repatriated with the assistance of the Native American Heritage Commission in 1983. The Indigenous group(s) involved in the reported repatriation is unknown; no documentation of this repatriation has been found.

In 2001, archaeological investigations for the Doyle Drive Project verified the location of the CA-SFR-6 (Jones and Stokes 2002). Cultural material such as flaked stone tools and debitage, burned rock, shell beads, obsidian, invertebrate shell, a bone awl tip, and vertebrate faunal remains were collected from the mound. The location of the site was mapped and documented. After these investigations, CA-SFR-6 and CA-SFR-26 were combined into a single archaeological site and designated CA-SFR-6/26. The Presidio Trust refers to the site as the Ohlone Mound.

Significance

The Ohlone Mound (CA-SFR-6/26) is individually eligible for the National Register of Historic Places. The site is significant under Criterion D, for its potential to contribute information vital to understanding the human history of the Presidio, San Francisco, the wider Bay Area, and California prior to colonization. The Ohlone Mound (CA-SFR-6/26) is one of only two known precolonial sites at the Presidio of San Francisco. It is a rare still-preserved shellmound site in the Bay Area where most sites have been profoundly impacted by both natural process and modern development.

Detailed investigations at the Ohlone Mound (CA-SFR-6/26) could help in studying the process of how shellmounds formed and their rate of accumulation. The mound could also provide information about settlement patterns and subsistence adaptations of Ohlone in the San Francisco Bay Area broadly and about activities at the site itself more specifically. The site retains integrity of location and an unparalleled integrity of association with the precolonial history of the area that is now the Presidio. While the setting has been substantially altered with the construction of Doyle Drive and the many substantial alterations to the marshlands and Bayshore, the restoration of Crissy Field Marsh, associated landscaping, and the redesign of Doyle Drive (estimated completion 2017) may contribute to strengthening the integrity of feeling by bringing back a more 'natural' sense of the San Francisco Bayshore.

Excavation at the Ohlone Mound (CA-SFR-6/26) has the potential to fill in some of the gaps in understanding created by earlier methods of excavation and sampling strategies that largely disregarded the rich subsistence data (floral and faunal) at these sites. Large quantities of faunal and shellfish remains from recent limited excavations at the site have revealed important information about subsistence adaptation. Fish bone, mammal bone (marine and terrestrial), bird bone, mussels, clams, and other gastropods were identified. Paleobotanical remains of bulrush and sedges, and nuts of wild cucumber, hazelnut, and California bay were also recovered through controlled excavation. Taken together, the floral and faunal evidence indicates an economy based on intensive fishing and marine mammal exploitation. The presence of exotic materials, including obsidian and shell beads, also begins to help illuminate some specifics of the trade and exchange system that CA-SFR-6/26 inhabitants participated in. Specifically, analysis revealed that obsidian traveled from both the Napa and Sonoma valleys.

The site not only has considerable scientific value, but it also has cultural, social, and other values for the present-day Ohlone community. CA-SFR-6/26 is important to local Indigenous groups given that it is one of the few accessible sites left in San Francisco where ceremonial, social and educational functions could be held.

Integrity

The physical integrity of the Ohlone Mound (CA-SFR-6/26) is known to be moderate to high and is predicted to be similarly high in adjacent unexplored areas, given that the deposit is buried fairly deeply below current ground surface. Available evidence suggests that the mound has been neither graded nor substantially modified throughout its history. Limited subsurface testing in 2002 revealed that the deposits were exceptionally well-preserved and contained large quantities of shell and unbroken identifiable faunal remains (Jones and Stokes 2002).

The Ohlone Mound (CA-SFR-6/26) is well-preserved and buried beneath substantial fill. The density of material recovered from the excavations indicates that faunal and invertebrate shell remains, as well as other materials, are present in abundance. The site likely contains midden soil rich with faunal material, botanical remains, potential housefloors and other architectural traces. A single human burial has been discovered at the site and it is likely that more interments are present.

The Presidio Trust will continue to carefully review all projects in the vicinity of the mound to ensure not only the avoidance of direct disturbance but also to ensure that all project personnel are aware that the site is important to many groups and should be treated with respect.

While the site has immense research potential, elective excavation should be limited to focused research questions formulated with a robust understanding of the large extant archaeological collection. **The Presidio Archaeology Lab does not consider human remains as research objects and does not support research that has the excavation of burials as a goal.** Because an interment has previously been discovered within the mound, it is likely that more burials are present. Any excavation at the Ohlone Mound (CA-SFR-6/26) would have to be carefully designed and have a contingency plan for the inadvertent discovery of buried human skeletal materials. Further, elective excavation will only occur after meaningful consultation with all interested community members, especially Ramaytush and other Bay Area Ohlone.

IV. Assessment

The Verizon Cell Site #27 A-D project has been carefully designed to **avoid** the Ohlone Mound (CA-SFR-6/26). All proposed equipment is located outside the known boundaries of the site and all ground disturbing activities have been routed around and to the west of the site. **No ground disturbing activities or ongoing site maintenance activities are permitted with the known boundaries of the Ohlone Mound (CA-SFR-6/26).**

There is a very low likelihood that buried precontact archaeological remains are present within the Verizon Cell Site #27 A-D Project Area. If present, they are likely to be below at least 6 feet of imported fill material. Proposed ground disturbing activities include the installation of power and fiber in a joint 490 foot-long trench no more than 3 feet deep.

Four steps are required to ensure that historic features and archaeological deposits and the surrounding cultural landscape are treated appropriately during project activities:

- A preconstruction archaeological briefing shall be held before the initiation of ground disturbance.
- A qualified archaeologist shall perform monitoring during ground disturbing activities. Inadvertent discovery protocols shall be followed during all project activities.
- A preconstruction briefing on the cultural significance of the site shall be conducted by a qualified Native American monitor before project initiation.
- A qualified Native American monitor shall be present during project activities.

Preconstruction Archaeological and Native American Cultural Briefing

Prior to the initiation of mass excavation for the Verizon Cell Site #27 A-D Project, a Presidio Trust archaeologist shall provide a briefing to the general contractor and any subcontractors responsible for ground disturbing activities. Supervisory personnel, forepersons, excavation equipment operators, and laborers should attend the briefing. Individual or group briefings will also be conducted when new subcontractors or workers are brought in. The briefing will include examples of the types of artifacts that have been previously found in the area of construction, procedures for archaeological monitoring, and inadvertent discovery protocols, as outlined below. An Native American monitor will provide also briefing on the protocols for respectful behavior at a village and burial site. The Scope for Native American monitoring will be provided by the Native American monitor under separate cover and is not included in this AMA/MP.

Archaeological Monitoring Plan

Archaeological monitoring is the observation of ground-disturbing activities that have the potential to uncover archaeological remains. The term describes the work of an archaeologist in a construction zone or similar context. The purpose of this plan is to ensure that any significant archaeological resources inadvertently discovered during construction activities for the Project are treated appropriately.

Full-time archaeological monitoring will be required during all ground disturbing activities within the Project. Full-time monitoring is defined as continuous observation by an archaeologist of all ground disturbance required for a project component, regardless of the horizontal or vertical extent of the planned excavation. That is, **an archaeologist must be physically present to observe the project activity from the initial breaking of the ground surface to the base of excavation.** Presidio Trust archaeologists will conduct archaeological monitoring for the duration of ground disturbing activities required for the project. The archaeological monitor will record observations made in the field during excavation and to document the general stratigraphy of the areas monitored. In the event of a potentially significant

discovery, it is the responsibility of the monitor to stop the work in the area and ensure that there are no adverse effects to cultural resources.

V. Inadvertent Discovery Protocols

An inadvertent discovery refers to any situation where previously unidentified archaeological resources or human remains are encountered during ground-disturbing activities. Inadvertent discovery protocols apply to those archaeological finds that are exposed during construction or construction-related activities ***whether an archaeologist is present or not.***

There are three types of inadvertent discoveries that are covered by this monitoring plan:

- Human remains.
- Cultural resources that are significant or have the potential to be significant.
- Cultural resources that a qualified archaeologist determines do not require further consideration.

If any of these three types is inadvertently discovered during construction, the contractor and archaeological monitor should follow the steps outlined below:

- All contractors will immediately report to the archaeological monitor if archaeological materials are uncovered during construction activities.
- Operations within the vicinity of the find should be temporarily halted until the archaeological monitor is consulted.
- In the majority of cases the archaeological monitor should be able to make a determination of significance for the find.
- If a clear significance determination is not possible, the Presidio Trust Archaeologist should be consulted.
- All materials, whether determined significant or not, are property of the Presidio Trust and are not to be taken for personal use or display.

Archaeological resources include stone, brick, and concrete building foundations, isolated historic artifacts, historic landfill deposits, historic privy pits and household waste deposits, and items of Indigenous use such as stone tools, shell and animal bone waste, shell beads, and habitation areas. A more detailed list follows:

- Human remains;
- Concentrations of rock, ash, animal bone or shell;
- Earth containing a dark, almost black or very dark brown soil often containing charcoal;
- Easily crumbled dark gray-brown soil with abundant shell fragments, animal bone, charcoal and artifacts such as shell beads, mortars, pestles, arrowheads, bone tools, etc.;
- Concentrations of artifacts such as stone bowls, arrowheads, bone tools, shell beads, etc.;
- Deposits containing large amounts of shell;
- Deposits containing glass bottles, metal, old cans or other obvious trash dumps (Note: single bottles, modern aluminum cans or beer bottles are not considered significant finds);
- Foundations (stone, concrete, brick or wood);
- Wells (outline, brick or wood lined);
- Trash dumps containing food debris (e.g. cut bone, seeds, pits); and,
- Adobe (unfired or fired) clay bricks.

Prior characterization of the first 6 feet of materials in Cell Site #27 A-D Project Area suggest that it is early twentieth century fill. If isolated, these materials are not considered to be archaeological resources and do not require further consideration. Other materials that do not qualify as archaeological resources might also be encountered. These include: modern subsurface utilities such as water or sewer lines, materials manufactured after 1950, and small concentrations of broken concrete, broken asphalt, and/or unmarked, unmortared bricks that have been deposited as fill, if no other cultural materials are present.

Human remains

Project-related ground-disturbing activities have been designed to avoid human remains. If human remains, funerary objects, sacred objects, or objects of cultural patrimony are inadvertently discovered they shall be ***protected in place*** and ***avoided*** by all project activities. Ground disturbing work in the vicinity of the find must immediately cease and the Presidio Trust archaeologist must be contacted. Presidio Archaeology Lab staff will notify the Presidio Trust's Federal Preservation Officer. If necessary, the Presidio Trust will notify the San Francisco Medical Examiner of the inadvertent discovery of human remains.

The immediate protection of human remains at the site shall be accomplished by (1) keeping any discovery confidential, and (2) securing the location to prevent disturbance of the remains and any associated materials.

The Presidio Trust archaeologist shall determine whether the Native American Graves Protection and Repatriation Act (NAGPRA) applies to the discovery and will ensure that the finds are treated in compliance with all requirements outlined at 43 CFR 10.4. Any materials not subject to NAGPRA will remain under Federal control.

The Presidio Trust archaeologist shall determine whether the human remains are a single isolated burial or are potentially part of a cemetery or a larger archaeological site. This may necessitate the involvement of a consulting physical anthropologist. Articulated human remains, either as part of a single burial or larger cemetery, will be ***protected in place*** and ***avoided*** by all project activities. This may involve abandonment or redesign of the project.

If the discovery is limited to disarticulated human remains, the Presidio Trust archaeologist or a consulting physical anthropologist will direct necessary collection efforts. Further identification work may be necessary to determine the frequency of disarticulated human remains in the project area and to determine an appropriate course of action. Any disarticulated remains collected from the site will be stored in archival boxes in a secure location until appropriate re-interment can take place. No human remains will be accessioned into the Presidio Trust Archaeological Collections.

VI. Curation

All archaeological materials and records ("the collection") generated by this project, with the exception of human remains and materials subject to NAGPRA, will remain the property of the Presidio Trust. Per 36 CFR Part 79.4(a), Federal archaeological collections are defined as "material remains that are excavated or removed during a survey, excavation or other study of a prehistoric or historic resource, and associated records that are prepared or assembled in connection with the survey, excavation or other study". Material remains may include archaeological artifacts, objects, specimens, samples, and other physical evidence. Associated records may include, but are not limited to, field, lab and

administrative records, reports, photographs and slides, digital media and records, correspondence, and other project documentation. In the event that no material remains are recovered during archaeological investigations, **associated records alone constitute a collection.**

The Presidio Trust Curator will coordinate with Trust Archaeologists to prepare and review collections for accession into the Presidio Trust's permanent Archaeological Collections. Collections are curated by the Presidio Trust on-site in its secure, climate-controlled Curation Facility. Collections are curated in compliance with 36 CFR Part 79 and in accordance with the Presidio Trust's *Archaeological Collections Policy* and *Archaeological Collections Management Guidelines* (Presidio Trust 2011, 2012). Information about the collections is accessible through the Re:discovery archaeology and collections management database.

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Jones and Stokes

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Appendix E: Acronyms

REPORT LIST OF ACRONYMS

Advisory Council for Historic Preservation (ACHP) Americans with Disabilities Act (ADA)
American Institute for Conservation of Historic and Artistic Works (AIC) Area of Potential Effect (APE)
Association for Preservation Technology (APT)
Built Environment and Archaeology Treatment Plans (BETP and ATP) California Office of Historic Preservation (OHP)
Center for Digital Archaeology (CoDA) Certificate of Compliance (COC) Cultural Landscape Report (CLR)
Cultural resource inventory report and finding of effect (CRIR-FOE) Design development (DD)
Environmental Assessment (EA)
Federal Highways Administration (FHWA) Federal Preservation Officer (FPO) International Center to End Violence (ICEV)
National Park Service-Technical Preservation Services (NPS-TPS) Historic American Building Survey (HABS)
Historic American Engineering Record (HAER) Historic American Landscape Survey (HALS) Historic Structure Report (HSR)
Leadership in Engineering and Environmental Design (LEED) Military Intelligence Service (MIS)
National Environmental Policy Act (NEPA)
National Japanese American Historical Society (NJAHS) National Historic Landmark (NHL)
National Historic Preservation Act (NHPA) National Park Service (NPS)
National Park Service - Pacific West Regional Office (NPS-PWRO)
National Park Service - Golden Gate National Recreation Area (NPS-GOGA) National Register of Historic Places (NRHP)
National Trust for Historic Preservation (NTHP) Neighborhood Associations for Presidio Planning (NAPP)
Presidio Historical Association (PHA)
Presidio Trust (Trust)
Presidio Trust's Programmatic Agreement for the Main Post Update (PA-MPU) Presidio Trust's Programmatic Agreement (PTPA)
Public-private partnership (P3)
National Historic Landmark District (NHLD) San Francisco Conservation Corps (SFCC) San Francisco Architectural Heritage (SFAH)
San Francisco County Transportation Authority (SFCTA) State Historic Preservation Officer (SHPO)
U.S. Coast Guard (USCG)