



June 4, 2012

Caroline D. Hall
Assistant Director, Office of Federal Agency Programs
Advisory Council on Historic Preservation
Old Post Office Building
1100 Pennsylvania Ave. NW, Suite 803
Washington, DC 20004

Reference: April 27, 2012 letter Concerning Section 106 Review Process for the 34th America's Cup, Presidio of San Francisco National Historic Landmark, Area B, San Francisco, California

Dear Ms. Hall:

This letter responds to your April 27, 2012 communication regarding the Section 106 review process that the National Park Service (NPS) and United States Coast Guard (USCG) in cooperation with the United States Army Corps of Engineers (USACE) and the Presidio Trust (Trust) are conducting for the forthcoming 34th America's Cup (AC34) planned for the San Francisco Bay in 2012 and 2013. The Trust has been in close communication with the NPS regarding both Section 106 review and the ongoing NEPA process since early 2011, and has engaged in planning discussions around Section 106 reviews with the interested agencies. We participated in the 2011 conversations with the NPS, SHPO and ACHP described in the May 14, 2012 NPS letter to your office, and reached agreement with our sister agencies at that time on how to proceed with Section 106 review for AC34.

Per this agreement, Section 106 compliance for any AC34 activities that take place on Trust-administered lands will be managed by the Trust through our 2002 Programmatic Agreement (PA). The NPS will be responsible for assessing potential cumulative impacts from AC34 across the NPS/Trust boundary (i.e., on the Presidio NHL as a whole.); and the Trust will coordinate its compliance reviews for AC34 activities that cross the Area A/Area B boundary with the NPS, as is customary per our joint management of the NHL. Our PA encourages the ongoing participation by the SHPO via notification of project reviews and end-of-year reporting; involvement of the public and other interested parties in AC34-related activities at the Presidio will be accomplished through our participation in the NPS and USCG-led NEPA process.

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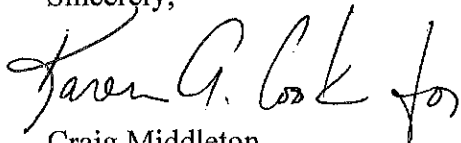
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The Trust is a cooperating agency for the NEPA process because the Trust administers the inland portion of the Presidio of San Francisco (also known as "Area B") whereas the NPS manages the waterfront areas ("Area A") of the NHL where AC34-related activities may take place. The historic buildings and structures within Area B will not be affected by AC34. Furthermore, no programmed event venue facilities or other physical alterations to the Trust-administered portions of the NHL are proposed under the project. According to the analysis in the EA, any changes in feeling and association in the Area B portions of the APE would be of short and intermittent duration (only during race days), and would be temporary, ending at the completion of the 2012 and 2013 race seasons.

Based on the analysis in the EA and application of Stipulation VII.B of our PA, we have determined that no historic properties are affected by the undertaking. This finding will be documented through our typical process under our PA and shared with the ACHP, SHPO and NPS via our year-end annual report, due on January 31, 2013. Should an AC34 event not currently contemplated be proposed in Area B in the future, we will apply the review process of Stipulation VII.B of our PA and assess the proposal accordingly. Notification of these subsequent reviews will be transmitted to the ACHP, SHPO and NPS via our weekly compliance communications, and in our annual report. The Trust feels that this is an appropriate course of action based on these discussions with our fellow agencies, particularly due to the low-impact nature of activities associated with AC34 on Area B resources.

Thank you for your inquiry and concern for the Presidio's historic resources, and the integrity of the Section 106 review process for AC34. We believe this letter answers the questions you asked in your letter of April 27, 2012. Should you wish to follow up on any of the matters discussed in this letter please contact Rob Thomson, Deputy Federal Preservation Officer at rthomson@presidiotrust.gov or 415-561-2758.

Sincerely,



Craig Middleton
Executive Director and Federal Preservation Officer

CC:

M. Wayne Donaldson, California State Office of Historic Preservation
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