

Main Post
Attn: Mr. John Pelka
The Presidio Trust
34 Graham Street
P.O. Box 29052
San Francisco, CA 94129-0052.

Re: Requested Scoping Comments on NEPA and other Processes

Dear Mr. Pelka:

Enclosed are the comments of the Presidio Historical Association (PHA) on the scoping of the Trust's combined processes, using a Supplementary Environmental Impact Statement (SEIS) on a proposed amendment of the Presidio Trust Management Plan (PTMP) for the Main Post district as a "legal vehicle" designed to also elicit scoping comments on the proposed hotel and museums, on the NHPA process, the amendment of the PTMP, amendment of Design Guidelines for the Main Post district, adoption of the Levantar plan, and for other proposed actions in the Main Post area of the National Historic Landmark District (NHLA).

As you will note in our comments in the Scoping:Process section, we believe this is an exceedingly, (probably impossibly) complex undertaking if all the processes are to be in legal compliance and are to rationally elicit relevant public input into good-faith administrative decisions by the Presidio Trust. This is further complicated by running these processes simultaneously with a separate RFP process, wherein the Trust has announced it will make its decision before the combined NEPA, PTMP and NHPA processes are completed. This is quite troubling, and it is not clear to us how this is legally or rationally possible. In our collective experience with NEPA, we have never seen an agency try to combine so many administrative processes into one, or run them simultaneously in so short a time, for such a significant and controversial set of proposals. If you are aware of any precedents for combining these measures in the way that you have, we would welcome a chance to know about them. We wish you good luck as you embark into this administrative law jungle.

Once again, we therefore urge the Trust to disentangle these processes, and administer them consecutively in a way that is rationally explainable to the public, following legally adequate notice given to a far broader segment of the public.

We also note that the museum controversy has now drawn many thousands of comments on the internet, (between 5 and 20,000 on Google today, depending on the search phrase), has been the subject of a number of regional television broadcasts, and has been covered in the local, regional and national press. It also appears to us, that of the internet comments focusing on the location of an art museum, a large majority strongly object to the placement of an art museum in the Main Post NHLD of the Presidio park. The extent of this controversy, in view of the limited public notice, and in view of the Trust's scheduling of public hearings between Thanksgiving and Christmas when the public is least able to give its best input, suggests that in line with applicable regulations, the EIS process, at a minimum, should be restarted. If it is, we suggest that it include wider public notice, and be structured as a full EIS process, with a full draft and final EIS on each project with potential significant adverse environmental and/or historical impacts.

We await your advice of the next steps in these multiple and simultaneous administrative processes.

Sincerely,

Gary Widman
President, Presidio Historical Association

Cc: Mr. Ric Borjes, Presidio Trust, Superintendent Brian O'Neill, GGNRA, Katharine R. Kerr, Advisory Council on Historic Preservation, Amanda Blosser, California Office of Historic Preservation, Paul Scolari, GGNRA, Elaine Jackson-Retondo, National Park Service, Anthea Hartig, National Trust for Historic Preservation, Anthony Veerkamp, National Trust for Historic Preservation, Becky Evans, Sierra Club, Neal Desai, National Parks Conservation Association, Boyd DeLarios, Los Californianos