

Subject: Scoping Comments

Dear Mr. Pelka:

I have a little understanding of NHPA and NEPA as a layman, but I do understand that there must be "compelling need" for a sponsoring agency to propose undertakings that will have a significant adverse effect on a National Historic Landmark. NHL are given a higher degree of protection than other sites. To date, the needs for the projects being considered have been explained in vague terms such as "make the Presidio a great national park" or "attract development." No need has been put forward that is capable of analysis, therefore I do not see how the SEIS process reasonably can proceed. We must have a statement of need that sustains systematic analysis for each proposal and the SEIS.

If "public use" is part of a need, then we must ask what agency is defining this use. Public use in a national park is defined by the NPS. The Trust does not have the authority in the Trust Act to do more than "cooperate" with the NPS in interpretation and visitor amenities. Logically, the NPS must sponsor a proposal such as a museum or interpretive pathway. The Trust "cooperates" with such a proposal. Moving the process forward as is being done rapidly without public knowledge of an NPS lead will bring attention to the legislative muddle that the Trust is in by trying to perform the functions of the Park Service. I say this knowing full well that there have not been productive relations in seven or more years between NPS and the Trust concerning an agreed interpretation plan or MOU for that purpose. To go forward unilaterally with the proposed new construction for facilities that constitute public use that will have significant adverse effects on the NHL to provide inappropriate public use in a national park. This is highly improper on the face of it, in terms of park service policies, historic preservation regulations, and careful implementation of the Presidio Trust Act.

The scoping process must examine the appropriateness of a clearly stated, analytical need statement with reference to the above, particularly public use.

If the stated need is financial, the scope must include examination of that need and the alternatives available for mitigation of the financial issue,

such as amending or rescheduling activities in the PTMP that are income producing but scheduled for destruction.

Notification of the public has been rushed and inadequate in terms of NEPA. NEPA calls for the sponsoring agency to consider the level of controversy and complexity of the undertaking when scheduling the scoping process. The process must be lengthened and simplified for the public. A new EIS rather than SEIS is indicated. Failure to do so might invalidate subsequent review activities. In my case, I find many concerned with the Presidio who have no knowledge of the larger undertaking, only of one newspaper article about the art museum. Furthermore, there was very little time to bring the issues to the attention of potentially concerned organizations and persons nationally. The time from the Trust announcing in its Board minutes that the Trust had been in discussion with the Fisher interests in April to the RFP announcement in October wasted several months. Then, with a very short time to respond to a very substantial RFP and barely a month after announcing the first scoping to input deadline, then the second round - and most of this in the holiday period - all has the appearance of a deliberately staged and rushed process to minimize informed public input.

Most of what I have to say is stated much better by others. The overall scope and scale of the proposals I find to be very offensive to the historic integrity of the NHLD. They show disregard for the American values that made the Presidio a NHLD and National Park in the first place. They make a lie of the frequent statement by Trust spokesmen that the Trust is making the Presidio into a "great national park." That cannot be done unless the National Park Service fills its leading role for "interpretation" and the Trust enthusiastically enters into public-private partnership with the NPS and the public to create interpretive activities that attract and inform the public of American history centered on the Golden Gate and the Presidio.

Finally, public statements accepting the gift of an art museum by Trust officials prior to completing the review of the RFP responses and prior to completion of the necessary environmental reviews was arrogantly premature. The Trust showed little respect for due process or public opinion. The Presidio is a national park and national historic landmark district. It belongs to the American people, not the Trust board or the neighbors.

