

**NATIONAL
TRUST
FOR
HISTORIC
PRESERVATION®**

Richard Moe
PRESIDENT

July 7, 2008

Mr. John L. Nau, III
Chairman
Advisory Council on Historic Preservation
1100 Pennsylvania Avenue, NW, Suite 803
Old Post Office Building
Washington, DC 20004

Dear John:

As you know, the National Trust for Historic Preservation is concerned about the massive amount of proposed new construction within the Presidio National Historic Landmark District. We are especially concerned about the location of the proposed museum and hotel vis-à-vis the historic Parade Grounds, and their inappropriately large scale, as well as a proposed major expansion of the historic theater. It is imperative that the Section 106 review and consultation process for these plans must include consideration of alternative locations and designs for the proposed museum, hotel, and theater. A thorough consideration of alternatives and modifications to the plans will assist the Presidio Trust in minimizing harm to the NHL District "to the maximum extent possible," as required under Section 110(f) of the NHPA.

The Presidio Trust is currently receiving public comments on a Draft Supplemental Environmental Impact Statement for an update to its Management Plan. The "proposed action" calls for up to 265,000 square feet of new construction at the Main Post – well over double the 110,000 square feet allowed under the current Management Plan, which was adopted just six years ago. Though the comment period for the DSEIS will expire in less than a month (on July 31, 2008), the Presidio Trust has not yet issued a Section 106 Determination of Effect, and has suspended the consultation process and cancelled the consultation meeting planned for next week. With the Section 106 consultation stalled, it appears likely that the opportunity for comment under the National Environmental Policy Act will have already concluded before any meaningful opportunity occurs to explore alternatives to avoid, minimize, and mitigate adverse effects through the Section 106 process.

Meanwhile, significant issues regarding the potential effects of the new plans remain unresolved. In the Draft SEIS, the Presidio Trust has directly acknowledged that the proposed actions will adversely affect the Main Post within the Presidio. However, the Presidio Trust has not yet determined whether the proposed actions will adversely affect the larger National Historic Landmark District, and instead repeatedly refers to the NHL District as merely "potentially" affected. This ambivalence about the effect on the NHL District was also reflected in statements by the Presidio Trust's Executive Director at a recent meeting in Washington on June 10 with staff from the ACHP and the National Trust. Representatives of the project proponent at that meeting supported a finding of no adverse effect on the NHL District – a position with which we strongly disagree.

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Because of the Presidio Trust's uncertainty about these effects, there is an urgent need for more detailed information to assist the agency in evaluating and assessing the effects of the proposed action on the NHL District. This is exactly the kind of situation in which a carefully framed Section 213 Report from the Secretary of the Interior would be extremely useful to assist the parties participating in Section 106 consultation. In addition to providing detailed analysis regarding the nature and magnitude of the potential effects on the NHL District, the Secretary's recommendations regarding measures to avoid, minimize, and mitigate the effects of the proposed new construction projects would be especially valuable.

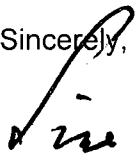
I recognize that you have expressed recent concerns about ensuring that Section 213 reports are used very carefully, even sparingly, as a tool for Section 106 consultation. However, I believe a Section 213 report would be especially valuable for the Presidio, since there appears to be substantial uncertainty, if not outright disagreement, about the nature and extent of the adverse effects on the NHL District. A carefully tailored request could help to clarify the ACHP's specific expectations about the scope of the report.

I strongly encourage you to use your authority under Section 213 of the NHPA to request a report from the Secretary detailing the effects and proposed recommendations regarding the future plans for the Presidio NHL District. A Section 213 report would help to guide the Section 106 review and ensure that the protection of the NHL District will remain the central goal of the consultation process.

Thank you for your thoughtful consideration of this request. As always, please feel free to call me if you would like to discuss this directly.

Warmest regards.

Sincerely,

A handwritten signature in black ink, appearing to read 'RMoe', written over the word 'Sincerely,'.

Richard Moe

RM:em