



August 2, 2008

The Honorable Nancy Pelosi  
United States House of Representatives  
Attn: Dan Bernal  
450 Golden Gate Ave., 14<sup>th</sup> Floor  
San Francisco, CA 94102

Re: HR 6305, Proposed Amendment to the Presidio Trust Act

Dear Speaker Pelosi:

The Presidio Historical Association applauds your effort to update the Presidio Trust legislation. The Trust, with a careful clarification of its role and responsibility, would have the potential to be a valuable institution for the Presidio, San Francisco and the nation, rather than a source of controversy. We at the Presidio Historical Association (PHA) are always prepared to work with your office on any questions, issues or legislation involving the Presidio or the Presidio Trust. We are always happy to provide information, consultation or help in any way in which it might be helpful to you.

We believe your bill's strongest points are the proposed renaming, officially giving us the "Presidio National Park", and eliminating the possibility that the Presidio could be turned over to the GSA for disposal.

Making the Presidio a National Park is a positive step, which will clarify and elevate the status of the Presidio bringing it into full partnership with the NPS National Park system. At the same time, we think there is a need for clarification of the Presidio Trust's unique role in that park, confirming the intent of the original legislation, making the Trust's role one of supporting the Park (formerly Recreation Area). (See below.)

Removing the risk that the Presidio could ever leave the National Park system, for any reason, is a reward that the NPS and Presidio Trust have earned, and a step that both the local and national public, and the PHA, will applaud.

To give the your amendment its full potential, and to minimize unnecessary future controversy, we fully support the "friendly amendment" suggestions discussed with your Washington office staff by the National Parks Conservation Association (NPCA), and described below.

More specifically, our comments and suggestions on your Amendment's provisions are as follows.

Section 1: No comment

Section 2: We strongly support these provisions creating a name change and clarifying the fact that the Secretary of the Interior has the ultimate authority over the administration of the entire Area, including the Presidio, (Sec. 2{b})

Section 3, (Presidio Trust Technical Corrections):

Sec. (a) amending Sec. 102(b) of the Act: The requirement that the Trust share the responsibilities for providing interpretive services orientation and educational programs is consistent with the earlier recommendations of the NAPA report on its audit and review of Trust activities and responsibilities. However, when stated as it is now in your Amendment, it leaves open an unnecessary ambiguity that could well be the source of unnecessary controversy. We assume that by taking this action, you do not intend to compromise or otherwise alter the national park mission and guidance applicable throughout the National Park system. To avoid the risk of such compromise or alteration, we think it is critically important to add the NPCA friendly amendment language stating: "The services, interpretation and programs so provided by the Presidio Trust shall comply with those standards and policies of the National Park Service applicable to such services, interpretation and programs in the National Park System."

This suggested language supports the concept expressed in the House Report (104 234) to the original legislation, which stated:

"Subsection (b) recognizes the expertise of NPS in providing visitor information and education programs. This subsection establishes that the Secretary shall be responsible for these programs throughout the Presidio, both on lands managed by the Secretary and on lands administered by the Trust." This language also supports the language and intent of this very bill, Sec. 2(b), which emphasizes that the Secretary of the Interior is ultimate administrative decision-maker, and that the intent is not to create a new category of parks, (where, implicitly, interpretive authority of the NPS might be questioned).

That original concept was, and is, a wise policy, which must be reconfirmed (as in the NPCA language suggested above) in order to avoid ambiguity, uncertainty and unnecessary controversy arising from your proposed amendment.

In order to further stimulate co-operation and progress in interpretation activities, we support the NPCA proposal to add to Sec. 3(b) following the above-suggested language. "The Secretary will submit to Congress an interpretation plan agreed to by both the Presidio Trust and the National Park Service by October 1, 2009 and each five years thereafter."

The Presidio Trust and Park Service have repeatedly promised such a jointly prepared interpretation plan, but after ten years it still has not been produced, perhaps because of uncertainty over the roles and responsibilities of each organization,--an uncertainty that

would be resolved by an amended amendment with the language suggested above. We also suggest that the legislative history for this amendment clarify the process by suggesting to the NPS and Trust that the joint plan be adopted following one or more public hearings and public written comment on a joint draft interpretation plan.

Section 3 (c)(2)(b) (re tenants):

We support the NPCA suggestion that the phrase “taking into account compliance with the Presidio Trust Act”, be added at the end of this provision.

The purpose of this addition would be to insure that the judgment of the quality of the tenants is based in large part on their consistency with the purposes of the Trust as expressed in Sec. 101 of the Trust Act, and we would hope that the Amendment’s legislative history would clarify that intention. Otherwise, the term “high quality” is entirely subjective, ambiguous and potentially arbitrary, and could lead to confusion and unnecessary controversy.

We would be remiss in not adding our own suggestion that when describing the qualifications for Trust Board members, Amendment Sec. 3(b)(2), that “history” or “history education” be added to the list of professional fields from which Board members will be picked.

In regard to the proposed Ft. Scott Advisory Task Force, while we have no objection to its creation, it appears to us that the Trust has authority now, without the amendment, to create such a Task Force, so that the amendment language on that subject is unnecessary.

As you know, the Presidio Trust’s current proposals have created controversy and opposition probably unmatched in recent San Francisco history. If we can help you in any way in regard to resolution of that controversy, or if as suggested above, we can provide you with any information or consultation on your proposed amendment, please contact me at your earliest opportunity.

Sincerely,



Gary Widman,  
President, Presidio Historical Assoc.

Cc: Dan Bernal  
Alexander Volberding  
Laura Levison  
National Parks Subcommittee  
Brian O’Neill, Superintendent, Golden Gate National Recreation Area  
Jon Jarvis, Regional Director, Pacific West Region National Park Service

Amy Meyer, People for the Presidio  
Neal Desai, National Parks Conservation Association  
Anthony Veerkamp, National Trust for Historic Preservation  
Brian Turner, National Trust for Historic Preservation  
Rebecca Evans, Sierra Club  
David Bancroft, Cow Hollow Association  
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Terry Graham