

June 1, 2009

VIA EMAIL (mainpost@presidiotrust.gov)

Mr. John Pelka
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The Presidio Trust
34 Graham Street
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**NATIONAL
TRUST
FOR
HISTORIC
PRESERVATION®**

**Western
OFFICE**

Re: Comments on NEPA Documents for the PTMP Main Post Update

Dear Mr. Pelka:

The National Trust for Historic Preservation appreciates the opportunity to comment on the Draft Supplemental Environmental Impact Statement and the Supplement to a Draft Supplemental Environmental Impact Statement for the Main Post Update (collectively, dSEIS) for the Presidio Trust Management Plan (PTMP) Main Post Update.

As a longtime preservation partner of the Presidio Trust, we are naturally concerned with a suite of projects that together would add 253,000 square feet of new construction in the historic Main Post District. We believe the Presidio Trust can accommodate new uses by prioritizing the re-use of its existing historic buildings and infrastructure, a concept that is well developed in the current management plan.

Given the unique constraints on new construction in the Presidio National Historic Landmark District (NHLD), we remain concerned that the dSEIS contains several shortcomings that are not consistent with the requirements of the National Environmental Protection Act (NEPA) and the Presidio Trust Act. The cumulative impact of such massive new construction will strain the carrying capacity of the NHLD, thereby compromising the viability of rehabilitation projects still awaiting implementation. Further, the dSEIS fails to analyze a reasonable range of alternatives, and contains insufficient baseline documentation to analyze the effects to historic resources.

Interest and Prior Involvement of the National Trust

The National Trust is a private, nonprofit organization chartered by Congress in 1949 to promote public participation in the preservation of our nation's heritage, and to further the historic preservation policy of the United States. See 16 U.S.C. § 468.

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With the support of more than 233,000 members, including more than 23,000 members in California, the National Trust works to protect significant historic sites and to advocate historic preservation as a fundamental value in programs and policies at all levels of government. The National Trust has nine regional and field offices around the country, including our Western Office in San Francisco, California, which is specifically responsive to preservation concerns in California.

Congress has also designated the Chairman of the National Trust as one of twenty-three members of the Advisory Council on Historic Preservation, the independent federal agency whose regulations govern the implementation of Section 106 of the National Historic Preservation Act (NHPA). See 16 U.S.C. § 470f, 470i(a)(8); 36 C.F.R. Part 800. The Advisory Council works with other federal agencies, including the Presidio Trust, to assist them in fulfilling their responsibilities under the NHPA.

The National Trust is a concurring party to the Presidio Trust Implementation Plan Programmatic Agreement (PA) and an invited consulting party to the Section 106 process for the proposed projects at the Main Post. In carrying out these roles, the National Trust recognizes the Presidio Trust Act mandate that the Presidio “be managed in a manner which...protects the Presidio from development and uses which would destroy the scenic beauty and historic and natural character of the area.” As the steward of the park’s vast array of cultural and natural resources, the Presidio Trust is charged with preserving the character and integrity of the Presidio National Historic Landmark District (NHLD). These massive new projects would be inconsistent with that mandate.

National Environmental Policy Act

The Presidio Trust’s dSEIS is flawed because it fails to adequately comply with NEPA requirements. Congress enacted NEPA to restore and maintain environmental quality, as well as to maintain aesthetically and culturally pleasing surroundings for the overall welfare of future generations. 42 U.S.C. § 4331. Included in this mandate is that federal agencies, to “improve and coordinate Federal plans,” must use “all practicable means” to “preserve important historic, cultural, and natural aspects of our national heritage. . . .” *Id.* § 4331(b). Federal agencies are required to: (i) analyze a reasonable range of alternatives, 40 C.F.R. § 1502.14; (ii) provide an adequate baseline of potentially affected historic properties, *Id.* § 1502.15; (iii) take a “hard look” at the direct, indirect, and cumulative impacts to historic properties, *Id.* § 1508.25; and, (iv) examine measures to mitigate the potential adverse impacts to historic properties, *Id.* § 1502.14. The Presidio Trust has not met these requirements.

I. The dSEIS Fails to Take a “Hard Look” at the Cumulative Impacts of the Main Post Projects.

NEPA requires the Presidio Trust to take a “hard look” at the direct, indirect, and cumulative effects of the proposed project on historic properties. 40 C.F.R. § 1508.25; Idaho Sporting Congress, Inc. v. Rittenhouse, 305 F.3d 957, 963 (9th Cir. 2002). A “hard look” includes “considering all foreseeable direct and indirect impacts.” *Id.* at 973.

A proper cumulative effects analysis “requires some quantified or detailed information; general statements about possible effects and some risk do not constitute a hard look absent a justification regarding why more definitive information could not be provided.” Klamath-Siskiyou Wildlands Ctr. v. BLM, 387 F.3d 989, 993 (9th Cir 2004). The agency “cannot simply offer conclusions. Rather, it must identify and discuss the impacts that will be caused by each successive [project], including how the combination of those various impacts is expected to affect the environment, so as to provide a reasonably thorough assessment of the projects’ cumulative impacts.” *Id.* at 1001.¹

Throughout the various iterations of planning at the Main Post, the National Trust has repeatedly expressed concerns that the Presidio Trust was failing to adequately consider cumulative effects as required by NEPA. We opposed the Presidio Trust’s initial processes that segmented the NEPA review of each individual project that made it more challenging to assess the cumulative impact of the proposed projects at the Main Post District on the entire NHLD. Such segmentation seriously undermines the Presidio Trust’s capacity to consider the full range of impacts and inhibits the development of alternatives that minimize negative impacts to the Main Post. Unfortunately, these deficiencies have not been overcome in the latest cumulative effects analysis in the dSEIS.

a. The dSEIS Contains Insufficient Detail Regarding the Potential Cumulative Effects of the Preferred Alternative.

The dSEIS fails to thoroughly assess cumulative impacts to the integrity of the NHLD. There is no doubt that the Presidio’s high degree of integrity has been eroded over recent years. The anticipated projects would substantially exacerbate this erosion, potentially to an unacceptable level. The National Park Service has warned that the cumulative impact of the proposed developments “severely

¹ It is important to note that the assessment of adverse effects under Section 106 of the NHPA also requires the consideration of cumulative effects, as well as “reasonably foreseeable effects caused by the undertaking that may occur later in time [or] be farther removed in distance” 36 C.F.R. § 800.5(a)(1).

diminishes the historic character of the Main Post, which is the heart of the Presidio of San Francisco, and significantly diminishes the overall integrity of the NHLD.” Section 213 Report, NPS, April 6, 2009, p.iii. Any assessment of the cumulative effects of the Preferred Alternative, therefore, must include reasonably foreseeable impacts on the integrity of the Main Post as well as the whole NHLD.

The dSEIS does not adequately discuss the prospective cumulative impacts of the Preferred Alternative. It simply refers to a list of past and ongoing projects and makes no mention how the future management of the Presidio is likely to be impacted. Specifically, a detailed discussion is needed as to how the implementation of the Preferred Alternative will impact the existing Presidio Trust Management Plan.

b. The Preferred Alternative Will Have a Cumulative Impact On All Other Planning Districts in the NHLD.

The massive amount of new construction proposed for the Main Post will have a cumulative effect on the NHLD as a whole that is not discussed in the dSEIS.

The PTMP requires the Presidio Trust to reduce building square footage in the Presidio by 360,000 square feet. To achieve this goal, it specifies a maximum square footage of new construction and demolition for each planning district. The Preferred Alternative will throw off this balanced approach, as it entails demolition and new construction of square footage far in excess of that currently permitted by the PTMP. This will inevitably result in a domino effect for planning in other districts. The dSEIS must analyze critical questions related to this effect. For instance, from which planning district(s) will the 143,000 excess square feet of new construction be eliminated? What buildings account for the 97,000 square feet of existing space that will not be demolished?

These are vitally important questions, since the balance between new construction and demolition was carefully vetted in the PTMP. In some planning districts, the PTMP acknowledged that future new construction would be necessary in other areas of the Presidio in order to accomplish other planning goals including the rehabilitation of historic buildings. By concentrating so much new construction in the Main Post, the allowable new construction in other planning districts will need to be adjusted downward. The same goes for demolition; will the reduction in allowable demolition in other planning areas reduce the opportunities to meet other PTMP planning goals? The cumulative effects analysis does not acknowledge these planning problems that will be created by so significantly changing these square footage targets.

One clear indication of how the Draft Main Post Update creates internal inconsistencies with the goals of the PTMP is the lack of direction for the future use of the Commissary site. Located in the Crissy Field District, this site is currently used for commercial purposes, but is intended to be converted to a museum under the PTMP.

The Main Post Update, however, is narrowly focused and cannot impact the Planning District Concepts & Guidelines for the Crissy Field District. The untenable result would be that two large museums in excess of 100,000 square feet could be permitted in the Presidio. This raises the question of whether the Main Post Update and the PTMP can coexist or whether a full revision of the PTMP is necessary to accomplish the project goals as written.

The dSEIS also contains no discussion as to how excess new construction and demolition at the Main Post will be accommodated under the unique spatial limitations imposed by the Presidio Trust Act. See 16 U.S.C. § 660 bb, Section 104(c)(3). The dSEIS fails to discuss how new construction contemplated in the Main Post Update would be justified under this rule. For instance, the Presidio Trust has not identified where comparable square footage will be removed in order to permit massive new construction at the Main Post. Given the magnitude of the departure from Preferred Alternative to the PTMP regarding allowable square footage, much more discussion on this point is required.

c. The dSEIS Fails to Adequately Consider Impacts to the NHLD as a Whole.

The National Trust disagrees with the conclusion in the dSEIS that, with the exception of the demolition of Buildings 40 and 41, other demolitions in the NHLD will only result in adverse effects to “the individual resources, but would not rise to the level of a significant impact.” By focusing on building-specific impacts and failing to consider many Presidio-wide impacts, the dSEIS understates the adverse effects on the NHLD. A Section 213 report submitted by the National Park Service on April 6, 2009 makes clear, “preserving the integrity of the parts...is crucial to maintaining the integrity of the NHLD as a whole.” As such, diminishing the integrity of the Main Post to this degree will have a significant adverse effect the NHLD.

The report describes in significant detail impacts that would occur to the integrity of feeling and association of the NHLD; these aspects of integrity receive only cursory review in the dSEIS analysis. The Section 213 Report asserts that a fundamental character defining feature of the Presidio is its contrast from the “urban fabric” of the City of San Francisco. Additionally, the report quantifies the dramatic skewing of the ratio between historic and non-historic construction that

would result from the demolitions and new building program of the Preferred Alternative. The conclusions of the Section 213 Report must be incorporated in the NEPA analysis.

d. The dSEIS Fails to Take into Consideration the Recently Accelerated Timeline for the Reconstruction of Doyle Drive.

The Doyle Drive Replacement Project recently received a large amount of federal stimulus money as part of the American Recovery and Reinvestment Act of 2009. The effects of the accelerated construction schedule could have impacts on the phasing of Main Post construction, and may indeed open up project alternatives that have not been explored. More information regarding the implementation of this project needs to be included in the dSEIS analysis on cumulative effects.

Recommendation: Careful planning at the Presidio is required before the Main Post proposals are seriously entertained. The Presidio Trust must adequately evaluate all cumulative impacts associated with the proposal including the impacts to other planning districts and overall inconsistencies with the PTMP. Further, the conclusions of the Section 213 Report should be incorporated into the “Affected Environment” Analysis. This report, prepared pursuant to the National Historic Preservation Act, includes a thorough, objective analysis of the types of impacts that will occur to the NHLD that is essential to inform the selection of NEPA alternatives.

II. The dSEIS Does Not Contain a Reasonable Range of Alternatives as Required by NEPA.

The National Trust believes the dSEIS analyzes an unreasonably narrow range of alternatives. All of the alternatives considered would destroy, alter, or impair historic resources and would undermine the integrity of the NHLD. Pursuant to the Council on Environmental Quality (CEQ) regulations implementing NEPA, the development and analysis of alternatives is the “heart of the environmental impact statement.” See 40 C.F.R. § 1502.14. The purpose of the NEPA alternatives requirement is to prevent the environmental analysis from becoming a “foreordained formality.” Citizens Against Burlington, Inc. v. Busey, 938 F.2d 190, 196 (D.C. Cir, 1991). NEPA furthermore requires the Presidio Trust to analyze a “reasonable range of alternatives,” including alternatives “not within the agency’s jurisdiction.” 40 C.F.R. § 1502.14(a), (c). Because the Presidio is a significant National Historic Landmark, the Presidio Trust must consider alternatives that preserve its historic integrity. 42 U.S.C. § 4331(b)(4).

a. The dSEIS Fails to Establish a Clear Purpose and Need for the Preferred Alternative.

The Purpose and Need in the dSEIS is inadequate because it does not clarify how the Main Post Update fits in to the overall planning process. Only those alternatives that meet the purpose and need of a project are considered reasonable. 40 C.F.R. § 1502.14. As a result of this inadequacy, the dSEIS analyzes an unreasonably narrow range of alternatives.

The dSEIS states that it takes into account “several proposals that were not fully contemplated” in the PTMP and the EIS; in fact, as the responses to public comments cited above demonstrate, the current Preferred Alternative calls for project types that were previously dismissed, including a large new hotel, a contemporary art museum, and expansion of the historic Presidio Theater into a multiplex cinema. Whereas the PTMP permits a maximum of 110,000 square feet of new construction in the Main Post District, the Main Post Update would allow 253,000 square feet, more than twice the amount currently allowed. Whereas the PTMP permits demolition of just 20,000 square feet of existing building space in the Main Post District, the Preferred Alternative would allow the demolition of 117,000 square feet of existing space, much of which is historic. This degree of change is dramatic.

Furthermore, the dSEIS states that with the current Main Post Update the Trust “is bringing more specificity” to the PTMP’s vision of the Main Post as “a focal point for visitor orientation and a community center.” However, this too is a misrepresentation of both documents. While the Preferred Alternative is perhaps more specific than the PTMP, it is not a refinement of the PTMP’s vision for the Main Post, but rather a radical departure from it. The dSEIS should specify that the dSEIS is required because the proposed developments cannot be justified or reconciled under the existing PTMP. For instance, the amount of new construction and demolition proposed far exceeds that currently permitted.

The dSEIS contains a list of objectives “derived from Presidio Trust Act findings and planning principles and policies set forth in PTMP,” and states that the updated planning concept for the Main Post should achieve (these) objectives to the fullest extent possible.” The dSEIS provides no indication regarding why these specific objectives were chosen, or how they comply with the Presidio Trust Enabling Legislation and the PTMP. We recognize that they are derived in part from the 2002 PTMP Main Post Planning District Concepts & Guidelines (p. 64, figure 3.2) but there are significant differences and disparities.

The new objectives include:

“Consider removing and/or replacing buildings at the Main Post as a management option in the administration of the Presidio”

and:

“Consider undertaking new construction at the Main Post to encourage reuse of historic buildings, reinforce historic character-defining features, and/or provide a rich visitor experience”

These are not *bona fide* planning objectives, but rather are a means of accomplishing other objectives and a pre-determined outcome. Their inclusion here appears to be an effort to justify particular projects. We are especially at a loss to understand what “achieving these objectives to the fullest extent possible” would entail. (For example “removing and/or replacing buildings” “to the fullest extent possible,” or “undertaking new construction ““to the fullest extent possible” would be flatly contradictory to the Presidio Trust’s stewardship responsibilities for managing and protecting the Presidio.)

b. The Existing Management Plan Should Guide the Selection of a Preferred Alternative.

The Presidio Trust fails to articulate a range of alternatives that reflect the specific parameters for future development outlined in the PTMP. Since the adoption of its management plan the National Trust has consistently endeavored to assure that the planning principles laid out in Chapter One of the PTMP —“Preserving & Enhancing Park Resources”—are reaffirmed and upheld. The PTMP places “the highest priority” on “actions that carry out the preservation, rehabilitation, and use of historic buildings and landscapes...” (PTMP, Ch.1, p.5) and affirms that “the Trust will undertake as little new construction and as little demolition of historic buildings as possible...” (PTMP, Ch.1, p.6). The PA reaffirms this concept by including a key substantive requirement that future planning documents will conform to PTMP Planning Principles to the “maximum extent feasible.”

As your preservation partner and a concurring party to the Presidio Trust PA, we believe these planning principles are a critical foundation for all planning at the Presidio. Any amendment or update to the PTMP must reinforce the centrality of these principles.

The Presidio Trust underscored its commitment to these planning principles in the Final EIR for the PTMP:

“[N]ew construction is envisioned as a way to facilitate rehabilitation and reuse by improving the functionality of older buildings and increasing the financial feasibility of reuse.” (Response to NC-4, p.4-166)

“[T]he Trust will make every reasonable effort to adapt historic buildings to new uses and that in cases where new construction is considered, it will primarily be to encourage the reuse of historic buildings.” (Response to HR-5, p4-115)

The Final EIR for the PTMP explicitly negates the potential that “program and museum uses will drive large-scale new construction,” stating:

“The Plan does not propose new construction to provide additional large-scale buildings as venues to host programs, but rather emphasizes rehabilitation and reuse of existing buildings for preferred uses, including program-related uses.” (Response to PR-8, p.4-210)

Likewise, a lodging facility such as the one currently under consideration was explicitly rejected in the Final EIR for the PTMP:

“Lodging will be provided in existing buildings, primarily historic buildings. The only new construction for lodging would consist of additions or annexes necessary to enable an existing structure to function as a lodging facility.” (Response to LO-5, p.4-200)

It is against this context of past land use planning documents from the Presidio Trust that the National Trust considers the dSEIS for the proposed Main Post Update.

c. The dSEIS Fails to Explore Alternatives for Proposed New Facilities Outside the Main Post.

The alternatives evaluated in the dSEIS were inappropriately narrowed by the Presidio Trust at the very beginning of this planning process. The Presidio Trust set into motion a cascade of poor planning decisions when it issued a Request for Proposals (RFP) for a cultural institution at the head of the Main Parade Ground without adequately considering the impact of such a building on the Presidio’s historic buildings and landscape. Had the RFP contemplated placement of a museum elsewhere on the Main Post or elsewhere at the Presidio, a more thorough analysis could be done on the impacts to historic resources.

Regrettably, the Presidio Trust staff instead shaped the Main Post Update around three non-conforming and applicant-driven proposals, rather than rejecting outright or requiring modifications in design and location of these three proposals prior to initiating its environmental review. As it is, the process has resulted in the improper exclusion of development proposals—and NEPA planning alternatives—that would likely avoid or minimize adverse effects.

The National Trust believes that there are other reasonable options for locating at least some of these uses outside this particular Planning District. For instance, Fort Scott presents unique opportunities for cultural uses and, like the Main Post, at one time was a vibrant and lively part of the Presidio. Today this site sits virtually vacant. The current focus on Main Post planning not only may foreclose potential future uses [see cumulative effects discussion above], but overlooks key opportunities to revitalize the Presidio.

Additionally, alternatives outside the jurisdiction of the Presidio Trust must be considered if they are reasonable. 40 C.F.R. § 1502.14(c). Such an alternative is reasonable in light of the January 27, 2009 Resolution of the San Francisco Board of Supervisors urging the evaluation of alternative locations for the proposed Fisher CAMP Museum within the City of San Francisco in a location closer to existing public transit infrastructure.

d. The dSEIS Fails to Contain a Preservation Alternative.

The dSEIS fails to evaluate an alternative that is focused on preserving the significant historic resources of the Presidio. As the steward of the National Historic Landmark, the Presidio Trust is obliged to “take such planning and actions as may be necessary to minimize harm” to the National Historic Landmark. 16 U.S.C. § 470h-2(f). In light of this mandate and of the number of unrehabilitated historic buildings at the Presidio, a “Preservation Alternative” that would maximize preservation of historic buildings and minimize new construction should be considered.

In fact, all the alternatives except Alternative 4: Status Quo would result in the demolition of historic buildings and a substantial amount of new construction in the Main Post. In addition, all alternatives for the reuse of the historic Presidio Theatre would have an adverse effect on the Theatre.

The dSEIS is especially lacking in its inclusion of alternatives that adequately protect resources dating from the Presidio’s recent historical eras. The Main Post is the one place to experience the full evolution of the Presidio, but under the Preferred Alternative, the entire period from 1942 to 2005--63 years--would be

represented by two non-contributing buildings-the 1968 former Burger King building and the 1988 Child Care Center.

e. The dSEIS Fails to Give Equal Weight to the Consideration of Alternatives.

The Presidio Trust's inappropriate bias toward selecting the Preferred Alternative is evident in the dSEIS and substantially diminishes the public's ability to adequately understand and comment on the consequences of the alternatives considered. NEPA requires that an agency give "full and meaningful consideration" to each alternative. Bob Marshall Alliance v. Hodel, 852 F.2d 1223, 1229 (9th Cir. 1988).

The dSEIS and process the Presidio Trust has followed has clearly weighted the preferred alternative in a way that prejudices all others. For example, the Preferred Alternative contains an entire draft plan and building guidelines, whereas other concepts are only minimally developed and fails to take advantage of opportunities to minimize adverse effects on the integrity of the NHLD. This makes an informed decision on the range of impacts difficult, and furthermore gives the appearance to the public that the adoption of Preferred Alternative is a foreordained conclusion.

Recommendation: The Presidio Trust should supplement the dSEIS to establish a clear purpose and need based on the PTMP. Further, selection of the preferred alternative should be based on degree of conformity with existing management guidelines, not an ad hoc plan that was created in response to specific development proposals. Additionally, preservation alternatives should be considered both outside the Presidio and within the Presidio that minimize new construction and demolition in the NHLD. Particular attention should be given to preserve *in place* the Main Post's contributing resources built after 1941. Finally, the Presidio Trust should supplement the dSEIS to fully explore a reasonable range of alternatives in a manner that is not clearly weighted in favor of the Preferred Alternative.

III. The dSEIS Provides Insufficient Baseline Documentation for Some Potentially Affected Historic Properties.

The Presidio Trust fails to include relevant baseline information about the Presidio and its historic properties. The establishment of a baseline of potentially affected historic properties is an essential requirement of the NEPA process. "[W]ithout establishing...baseline conditions..., there is no way to determine what effect [an action] will have on the environment, and consequently, no way to comply with

NEPA.” Half Moon Bay Fisherman’s Marketing Ass’n v. Carlucci, 857 F.2d 505, 510 (9th Cir. 1988).

Specifically, the dSEIS fails to consider the effects of the *Main Parade: Greening the Heart of the Park* project. While that plan was the subject of a previous Environmental Assessment (EA) and a Finding of No Significant Impact (FONSI), the current proposal for the Main Parade rehabilitation is fundamentally different than the approved 2007 EA plan. In any case, the FONSI does not constitute an actual approval of the Preferred Alternative, but rather simply states that an Environmental Impact Statement would not have to be prepared.

The National Trust has previously requested the inclusion of the Main Parade Rehabilitation in the current NEPA process, and noted that the failure to include it “reduces the ability of the SEIS to consider the full range of impacts and institutes conditions that constrain the development of alternatives that minimize negative impacts to the Main Parade.” See National Trust Comments on Scoping for Supplemental Environmental Impact Statement for Main Post District, December 17, 2007.

Recommendation: Supplement the dSEIS to include more baseline information to properly analyze the impacts of the alternatives on the NHLD. Given the recent changes to the Main Parade Rehabilitation proposal, and its complex interaction with the Preferred Alternative (interactions that were not considered in the previous EA), we repeat our assertion that it is essential that the Main Parade Rehabilitation be considered as part of the current NEPA review process.

Conclusion

The effect of the Preferred Alternative on the Presidio as a whole will be wide-ranging. A thorough analysis of impacts to the NHLD is required and more options considered that will preserve the buildings and landscapes that make it unique. Further, the deviation of the Main Post Update from the existing PTMP management guidelines is severe. The dSEIS must address the impacts from changing land use preferences at the Main Post to other planning districts and other cumulative impacts. We are cognizant that the result of that analysis may find it inevitable that, in order to fulfill its prospective goals for the Main Post District, the Presidio Trust may first need to revise the entire PTMP.

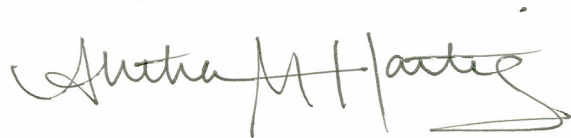
In these comments we have suggested that the Preferred Alternative might test the carrying capacity of the Presidio and threaten the integrity of the NHLD. However, we are equally concerned that the Presidio Trust is nearing a tipping point with regard to public engagement and support.

Mr. John Pelka
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The environmental consequences of the Preferred Alternative have been vigorously deliberated by stakeholders, many of whom believe that the Presidio Trust is failing in its stewardship responsibilities for the NHLD. Should the Presidio Trust continue along its current path without a major course correction, the result could be a "line in the sand" mentality among stakeholders that would be difficult to overcome. There is the very real prospect that implementing the Preferred Alternative comes with a hefty price tag: future preservation projects may never make it out of the initial planning stages. The public's opposition to further development of any kind may trump needed support for the preservation of the Presidio's many historic buildings still awaiting rehabilitation.

We do not believe that such an outcome is inevitable, but if it is to be avoided, the Presidio Trust must remain true to its mandate to manage the Presidio in a manner that protects it from development and uses that would destroy its scenic beauty and historic and natural character. We remain committed to working with the Presidio Trust and all stakeholders to help assure that present and future generations can continue to enjoy, learn from, and be inspired by this national treasure.

Sincerely,

A handwritten signature in black ink, appearing to read "Anthea M. Hartig". The signature is fluid and cursive, with a long horizontal stroke at the end.

Anthea M. Hartig, Ph.D
Director