

Presidio Trust's comments received by e-mail, 3/27/2007

The Presidio Trust (Trust) has reviewed its previous comments and it appears that many of the objectionable sections have been deleted and the grammar has been mostly cleaned up. The following substantive concern remains:

*Purpose of the Guide, page 1, 1<sup>st</sup> paragraph.* The 4<sup>th</sup> sentence contains a laundry list of federal actions where NEPA would apply. Included in this list is "managing a national wildlife refuge." By analogy, NEPA would also apply to "managing a national park." While some aspects of managing a park are subject to NEPA (i.e., other listed examples such as building structures, expanding roads, or permitting certain activities), the day-to-day management of a park is not subject to NEPA. NEPA applies to "proposed actions" not business as usual. The Trust would recommend this "managing" example be deleted since it could confuse the reader as to the scope of NEPA.

We might also point out that EO 13148 (cited on page 17) has been rescinded and replaced with EO 13423.

Thanks again for considering our comments.

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