

**GUARDING AMERICA'S HERITAGE . . .**



The National Trust **Legal Defense Fund** responds on many fronts to help local communities around the country protect their historic character, their neighborhoods, their unique places, and their quality of life. The LDF team works with preservation advocates all over the country, not only in the courtroom, but also in city council chambers and executive offices at the federal, state, and local levels, to protect the irreplaceable qualities that make our communities special. Our first goal is to avoid the need to go to court at all, by using advocacy to encourage

better government decisions that protect historic sites, neighborhoods, and landscapes. When necessary, however, the **Legal Defense Fund** is prepared to litigate to protect the Nation's historic resources.

The following update summarizes a few of the recent developments in our current advocacy efforts. These cases represent only a fraction of the preservation controversies we work to resolve each year. More information on recent LDF developments is available on the Trust's website: [www.nationaltrust.org/law](http://www.nationaltrust.org/law)

**RECENT WINS . . .**

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**PUBLIC LANDS ADVOCACY YIELDS RESULTS**

**OIL AND GAS LEASE PARCELS WITHDRAWN AT PAROWAN GAP, UTAH**

On February 5, 2007, the National Trust joined the Southern Utah Wilderness Alliance, Natural Resources Defense Council, and The Wilderness Society in a successful protest of six parcels in the area of Parowan Gap, which were included in the Bureau of Land Management's February 2007 oil and gas lease sale. Parowan Gap contains an exceptionally high concentration of petroglyph sites, most of which are included in a forty-acre district listed on the National Register in 1975.

BLM attempted to sell the Parowan Gap parcels in 2005, but withdrew the offering after the Paiute Indian Tribe of Utah and the Hopi Tribe objected. BLM claimed

that it would analyze the effect of oil and gas development on cultural resources in Parowan Gap as required by the NHPA and NEPA. However, BLM failed to conduct this review prior to the February 2007 lease sale. The protest highlighted this failure, in which we argued that prior to selling oil and gas leases, BLM must comply with Section 106 and NEPA. On February 13, 2007, BLM granted our requested relief and agreed to withdraw six of the eight parcels nearest to Parowan Gap from the sale.



Parowan Gap Petroglyphs Copyright © Calvin J. Hamilton

Parowan Gap, a three-mile long pass through the Red Hills of southwestern Utah, contains a number of nationally recognized rock art panels. [Parowan Gap Petroglyphs © Calvin J. Hamilton]



The Upper Green River Rendezvous served as a popular rendezvous site for Rocky Mountain fur traders between 1825 and 1840. [WYSHPO]

## OIL & GAS LEASE PARCEL WITHDRAWN NEAR UPPER GREEN RIVER RENDEZVOUS SITE NATIONAL HISTORIC LANDMARK IN WYOMING

On January 22, 2007, the National Trust successfully protested the BLM's decision to offer a lease parcel for oil and gas drilling adjacent to several significant

historic properties, including the Upper Green River Rendezvous Site National Historic Landmark (NHL) and the DeSmet Monument. BLM made this offering without

first complying with Section 106 of the NHPA. In response to the Trust's protest, BLM withdrew the parcel from the sale.

## FOREST SERVICE SIGNS PROGRAMMATIC AGREEMENT FOR OIL AND GAS LEASING IN CUSTER NATIONAL FOREST, SOUTH DAKOTA

The National Trust recently helped negotiate a Programmatic Agreement (PA) to ensure Section 106 compliance for the issuance of potential oil and gas leases within the Sioux Ranger District of the Custer National Forest in South Dakota. The area has been identified by many Native American tribes, including the Standing Rock Sioux, Cheyenne River Sioux, and Lower Brule Sioux, as an area with many traditional cultural resources. Yet the Forest Service has surveyed

less than three percent of the area, which covers more than 50,000 acres.

Since July 2003, the National Trust has been involved in the NEPA and Section 106 review for proposed oil and gas leasing in the area. The PA, negotiated under Section 106, establishes a standardized process for seeking tribal input with respect to specific potential leases and traditional cultural properties. Importantly, the PA has the potential to incorporate a process for future compliance with

Section 106 prior to the issuance of leases, and will help to identify and protect significant cultural resources before it is too late. We will monitor the implementation of the PA to determine whether this approach is successful and potentially use it as a model for other areas where conflicts arise between the frequently competing interests of energy development and cultural resource protection.

## NEW LITIGATION . . .

### TRUST LDF HELPS LOCAL PRESERVATIONISTS IN MARYLAND PURSUE SECTION 106 ENFORCEMENT FOR HISTORIC FORT RITCHIE

As work begins on Section 106 consultation for historic properties affected by the 2005 round of Base Realignments and Closures (BRAC), some local groups around the country are still working to ensure protection for historic properties affected by previous rounds of BRAC. In a new case for the LDF, the Trust has been able to help two local preservationists working to protect historic Fort Ritchie, an Army base in north-central Maryland, which was closed through BRAC in 1995.

Fort Ritchie (originally known as Camp Ritchie) was developed in 1926 as a training post for the Maryland National Guard. The signature Fort building was designed to resemble the castle in the Army Corps of Engineers' logo. In 1942, Camp Ritchie was converted to an Army base and used for military intelligence training and the development of psychological warfare.

When the Fort was closed as a result of the 1995 BRAC round, the Army complied with Section 106, executing a Programmatic

Agreement (PA) and adopting good design guidelines for reuse of the property. However, the current proposal for development by Corporate Office Properties Trust violates the design guidelines. For example, the proposal includes office buildings and parking lot construction on the historic Parade Field and in other open space areas.

Two local property owners near Fort Ritchie have been waging a pro se litigation battle to enforce compliance with the PA since 2005. Unfortunately, in August



Fort Ritchie (Maryland National Guard building) (1926)

2006 a federal district judge in D.C. ruled that the plaintiffs lacked standing to bring the action. In doing so, the court failed to cite a single case under Section 106, and the court's opinion was clearly wrong. When the local preservationists appealed, the Army filed a motion for "summary affir-

mance" of the lower court's decision on standing.

The Trust LDF not only helped to defeat the motion – joining with the Natural Resources Defense Council in an amicus brief on standing, filed January 17, 2007 – but also helped to secure excellent pro bono representation for the plaintiffs by O'Melveny & Myers in Wash-

ington, DC. The denial of the Army's motion on March 30 by the U.S. Court of Appeals for the D.C. Circuit ensures that the preservationists will have their day in court, with an opportunity to uphold the important national precedent of standing to enforce compliance with Section 106 agreements.

## UPDATES. . .

### **NEW ORLEANS PRESERVATION ADVOCATES SEEK REVIEW BY THE U.S. SUPREME COURT OF THEIR CHALLENGE TO A MAJOR HOUSING AND COMMERCIAL DEVELOPMENT IN THE LOWER GARDEN DISTRICT**

Local New Orleans preservation advocates have filed a petition for certiorari with the U.S. Supreme Court, after the U.S. Court of Appeals for the Fifth Circuit rejected their challenge to the HUD-funded redevelopment of the St. Thomas public housing project under NEPA and Section 106 of the NHPA. The preservation groups argued that the Fifth Circuit applied the wrong standard of review to determine whether a full Environmental Impact Statement (EIS) should have been prepared to analyze the impacts of the project.

The St. Thomas Redevelopment project, funded in part by HUD's HOPE VI program, involved the demolition of a 1500-unit historic

public housing project, which was National Register-eligible in its own right, but also in the heart of the Lower Garden District. The public housing project will be replaced by a major mixed-income and mixed use development, which includes a 200,000-square-foot Wal-Mart store in the heart of the historic district, and massive new 13-to-14-story high-rise residential buildings. The Fifth Circuit upheld HUD's decision not to prepare an EIS, based on the assumption that the impacts would be insignificant.

On April 13, 2007, the National Trust filed an amicus brief in support of the petition with the Supreme Court. We argued that the whole purpose of the HOPE

VI program is to have a significant impact on the quality of the human environment, and we documented a disturbing trend among federal agencies and by HUD in particular, to avoid preparing EISs. We also discussed why NEPA compliance is so important for the protection of historic resources. A group of prominent environmental and land use law school professors also filed an amicus brief with the Supreme Court in support of the petition for certiorari.

In addition to filing our amicus brief, the Trust LDF also helped to secure excellent *pro bono* representation for the local preservationists by O'Melveny & Myers in Washington, DC.



The Trust filed an amicus brief in support of local preservationists' petition to the U.S. Supreme Court [NTHP]

## LDF IN ACTION . . .

### **NATIONAL TRUST JOINS CONNECTICUT TRUST IN AMICUS BRIEF TO PROTECT PRE-REVOLUTIONARY HOME IN NORWALK, CONNECTICUT**

On March 7, 2007, the National Trust, joined by the Connecticut Trust, filed an amicus brief in support of the Norwalk Preservation Trust

in Connecticut, in an effort to stop the demolition of Grumman-St. John House. The Grumman-St. John House is a pre-Revolutionary home in

the National Register-listed Norwalk Green Historic District, which was damaged in the 1779 Battle of Norwalk, but later repaired. The



The Grumman-St. John House, in Norwalk, Connecticut, proposed for demolition by the nearby Norwalk Inn.

nearby Norwalk Inn, a modern hotel, bought the historic house in 2001, intending to demolish the building in order to construct a new annex to the Inn, and applied for a demolition permit from the City in September 2006. Norwalk's ordinance requiring an automatic 90-day demolition delay expired in December 2006.

The Norwalk Preservation Trust filed a lawsuit seeking to enjoin demolition of the Grumman-St. John House, under the Connecticut Environmental Protection Act (CEPA), which requires a showing of "no feasible

and prudent alternative" prior to the destruction of environmental and historic resources. The Connecticut Attorney General, on behalf of the SHPO, intervened as a plaintiff in the lawsuit.

The injunction hearing in Stamford Superior Court involved a total of nine grueling (and expensive!) days of testimony in late December and early January, with the Inn raising a wide variety of issues, ranging from an attack on the building's National Register eligibility to a demand that preservationists post a security bond. The testimony included a discus-

sion of preservation alternatives, such as using the historic house as a Bed & Breakfast, selling the building for adaptive reuse as medical offices, and designing an addition to the Norwalk Inn that would be sited to occupy vacant land, rather than requiring the demolition of the Grumman House.

The amicus brief was filed in support of the extensive post-hearing briefs filed by the Attorney General's office. The Court has not yet ruled on the request to enjoin demolition of the building.

## MINNESOTA DISTRICT COURT DISMISSES PRESERVATION LAWSUIT CHALLENGING THE DESTRUCTION OF HISTORIC GROVE STREET ON NICOLLET ISLAND IN MINNEAPOLIS, BUT COURT OF APPEALS CASE REMAINS PENDING

On March 5, 2007, a Minnesota District Court dismissed the Friends of the Riverfront's lawsuit against the City of Minneapolis and DeLaSalle High School on the grounds that the Friends' right of review of the decision approving the destruction of the eastern half of historic Grove Street is in the Minnesota Court of Appeals. Because of the district court's bizarre interpretation of the Minnesota Environmental Rights Act (MERA), one of the strongest preservation statutes in the country, the Friends are considering appealing the decision. Due to a technicality, the Trust and the Preservation Alliance of Minnesota (PAM) were not parties to this lower court decision. However, the Trust and PAM are still plaintiffs, along with the Friends, in the initial challenge of the Minneapolis City Council's

decision to approve DeLaSalle's proposal. The Court of Appeals has not issued a decision in that case.

DeLaSalle High School has proposed a massive new athletic complex, including a 750-person stadium and a parking lot on several acres of open park land on Nicollet Island. All of Nicollet Island is within the St. Anthony Falls Historic District, which is listed on the National Register and also designated by the Minneapolis Heritage Preservation Commission (HPC). Construction of the new stadium would destroy half of Grove Street (a historic street platted in 1866 as part of the original street grid), which would harm the character and integrity of the historic district.

Both lawsuits were prompted by the Minneapolis City Council overturning the HPC denial of the school's

request to build the stadium in July 2006, and issuance of a certificate of appropriateness, despite public opposition, including objections from the National Park Service, the Minnesota State Historic Preservation Office, and the Trust. We argue that the project would violate MERA, which requires a showing that there is "no feasible and prudent alternative" to any project that would require the destruction of environmental or historic resources. The requirements of MERA have not been satisfied, since there are feasible and prudent alternative locations for the athletic complex, which would avoid the destruction of historic Grove Street.

DeLaSalle requested approval from the HPC of an amended design proposal for the stadium, one that continues to destroy Grove



The National Trust has joined with Friends of the Riverfront to challenge a decision by the City of Minneapolis and DeLaSalle High School to build a stadium on top of historic Grove Street on Nicollet Island, which dates from 1866. [Friends of the Riverfront]

Street. In March 2007, the HPC denied DeLaSalle's amended stadium propose

for similar reasons to its July 2006 denial. HPC has appealed to the Minneapolis

City Council, and a hearing is set for April 19, 2007.

## BONNET HOUSE VIEWSHED THREATENED BY HIGH-RISE DEVELOPMENT

In January the LDF provided testimony before the Fort Lauderdale Planning and Zoning Commission supporting the rejection of a proposal to allow construction of a 20-story, 220-foot-high luxury hotel that would sit approximately 204 feet south of the Bonnet House. Prior to the Planning and Zoning Commission's hearing, the Historic Preservation Board rejected the plan. At the Planning and Zoning Commission, the LDF, along with the Bonnet House and Florida Trust for Historic Preservation, argued that the construction of the hotel would create a severe adverse impact on the Bonnet

House and one of its primary viewsheds.

The Bonnet House, which is listed on the National Register and is a designated local landmark, is located on a pristine, native, thirty-five acre barrier island habitat in Fort Lauderdale. The site was home to the artist Fredrick Bartlett and contains a variety of vernacular island style buildings. The Bonnet House is one of Fort Lauderdale's most important historic resources, and the National Trust has a special interest in protecting the site, since we hold contingent interests in the property, which was given to the Florida Trust for

Historic Preservation by Evelyn Bartlett.

Fortunately the Planning and Zoning Commission rejected the proposal to build the hotel. However, the developer appealed directly to the Mayor and City Commissioners for approval. In March, the LDF provided testimony in support of viewshed protection for the Bonnet House. Fortunately, the Mayor and City Commissioners voted to reject the planned development. The fight to protect the Bonnet House and its viewsheds, however, is not over since the developer will likely pursue legal action against the city.



Aerial view of the Bonnet House.  
[Bonnet House]

## PUBLICATIONS, WORKSHOPS, CONFERENCES AND CLASSROOM INSTRUCTION . . .

The Law Department produces a number of publications, holds and participates in workshops and conferences throughout the year, and teaches historic

preservation law classes at the University of Maryland and elsewhere. This effort provides preservation professionals, students, and the public with the legal informa-

tion they need to protect historic resources within their own communities. The list below is a sampling of the Department's recent work in this area.

### PUBLICATIONS

#### Easements

Spurred by the controversies that led to the adoption of new easement legislation in the Pension Protection Act of 2006, the Law Department (Paul Edmondson, Tom Mayes) has developed a collection of easement-related materials, including—

- *Summary of Changes Relating to Preservation Easements*

*in the Pension Protection Act of 2006*

- *Amendments to Internal Revenue Code § 170(h) (1) (showing revisions under the Pension Protection Act of 2006)*

- *Model Historic Preservation Easement, 2007*

- *Best Practices for Preservation Organizations Involved in Easement and Land Stewardship, 2007*

- *New Reporting Requirements for Nonprofit Organizations with Easement Programs, 2007*

Information on easements, along with these publications has been made available to

the general public through the National Trust's website and is used at conferences and workshops on easement

programs. Legal staff (Julia Miller, Ross Bradford) is also working on updating and revising "Establishing an

Easement Program," which was first published in 1980 and updated in the early 1990s.

### Native American Advocacy

With the assistance of a \$10,000 grant from the Bay Foundation, the Law Department (Julia Miller) has developed a draft manuscript entitled "Protecting Native American Cultural Resources Through Federal Law Programs," which will be made available to Tribes and others as part of a series of grant-funded workshops on how to protect Native Ameri-

can Cultural Resources and Sacred Sites. Inspired by the Department's successful publication, "The Layperson's Guide to Historic Preservation Law," the 75-page booklet explains in plain English how the U.S. Constitution, the National Historic Preservation Act, the National Environmental Policy Act, Section 4(f) of the Department of Transportation

Act, the Native Americans Grave Protection and Repatriation Act, the Archaeological Resources Protection Act, and other laws can be used to protect resources of cultural importance to Native Americans. The publication is awaiting peer review and final printing. The development of workshops is contingent upon further funding.

### Preservation Law Reporter and Current Legal Developments

Following suspension of the *Preservation Law Reporter* after 22 years of publication, the Law Department has wrestled with the question of how to continue to service the demand for information on past and current legal developments. In an effort to provide continuing access to the Reporter, the Depart-

ment is exploring the possibility of making the publication available on a searchable CD. In addition, we are developing new publications that will be down-loadable for purchase through Preservation Books. For example, Julia Miller has written two 15-page publications: *Protecting Potential Landmarks*

*through Demolition Review*, and *Regulating Religious Properties Under RLUIPA*, which are ready for sale. The Department will also be launching the first of its annual summaries of preservation court decisions, which will also be available for purchase through Preservation Books.

### CONFERENCES AND WORKSHOPS

The Law Department plays a major role in organizing conferences and workshops and developing materials for pro-

grams on a wide range of historic preservation law topics. In addition, legal staff also speak at conferences

and events organized by other entities throughout the year.

### ALI-ABA Program on Historic Preservation Law

On April 28th and 29th, 2007, the National Trust Law Department co-sponsored an ALI-ABA program on Historic Preservation Law. Staff has

worked closely with ALI-ABA in designing the program, selecting speakers, developing a 1,000-page course book of preservation law ma-

terials, and moderating and speaking at individual sessions. Speakers include Paul Edmondson, Betsy Merritt, Tom Mayes, and Julia Miller.

### Easement Workshops and Speaking Engagements

With grants from the Claneil Foundation and the Graham Foundation, the Law De-

partment (Paul Edmondson, Tom Mayes, and Ross Bradford) held a workshop on

easement management practices and the new easement legislation in Chi-

cago on April 17, 2007. The publication, Best Practices for Preservation Organizations Involved in Easement and Land Stewardship (see above) was developed in conjunction with this effort. The Law Department staff has also spoken on easements in a number of venues across the country:

- California Preservation Foundation, Los Angeles, May 2007 (Tom Mayes)

- Statewide & Local Partners Meeting, Knoxville, April 2007 (Paul Edmondson, Tom Mayes)

- Farm & Ranch Lands Protection Program, USDA, Natural Resources Conservation Service, Washington, DC, Dec. 2006 (Tom Mayes)

- ALI-ABA Conservation & Façade Easements Program, Hilton Head, SC, Nov. 2006 (Paul Edmondson)

- ABA Meeting on Taxation & Trusts & Estates, Denver, Oct. 2006 (Tom Mayes)

- Land Trust Alliance Program on "Preservation Perspectives on Conservation Easements," Nashville, Oct. 2006 (Tom Mayes, Ross Bradford)

- Statewide & Local Partners Meeting, Pittsburgh, Sept. 2006 (Paul Edmondson, Tom Mayes)

### International Archaeology Workshop

At the end of February, the Legal Department along with DePaul University College of Law co-sponsored a five-day training workshop entitled "A Toolkit for Preservation of the Archaeological Heritage: Legal, Documentation and Security Methods" in Washington, DC. The workshop focused on

changes that need to be made in domestic and regional legal regimes, archaeological site and museum documentation, security issues, and law enforcement, to strengthen efforts to deter the trade of looted artifacts and encourage preservation of archaeological sites. Participants included

archaeologists, law enforcement, museum professionals, and lawyers from seven Near Eastern and Central Asian nations, including Egypt, Syria, Palestine Authority, Lebanon, Pakistan, Turkey, and Jordan. Anita Canovas presented a lecture on U.S. historic preservation laws and the legal system.

### National Trust Conference

Each year the Law Department assumes a primary role in the development of educational sessions for the National Trust's annual conference and speaks at individual

sessions. This past October, George Siekkinen spoke on historic preservation and sustainable design, Betsy Merritt moderated a panel on issues relating to

the preservation of the World Trade Center Site, and Paul Edmondson, Tom Mayes, and Ross Bradford conducted a session on easements.

### Miscellaneous Speaking Engagements

Law Department staff has also addressed audiences or participated in workshops on a wide range of other topics.

- Tom Mayes lectured on takings at the National Trust's Community & Countryside Program in Martinsburg, WV in March 2007, and in Orange, VA in September 2006, as part of the Journey Through Hallowed Ground project. He also

spoke on the Americans with Disabilities Act at a town meeting sponsored by the DC Advisory Neighborhood Commission for Mount Pleasant in March 2007.

- Julia Miller participated in a Trust-sponsored workshop on teardowns in Chicago in February 2007.

- Mike Smith and Ti Hayes represented the National Trust at the Networking

Luncheon for the 17<sup>th</sup> Annual National Association of Environmental Law Societies Conference, hosted in March 2007 by George Washington University Law School.

- Mike Smith gave a presentation in Flagstaff, AZ in September 2007 on legal issues regarding the management of cultural resources in BLM's National Monuments and Conservation Areas

## CLASSROOM INSTRUCTION

For well over a decade, the Law Department, under the leadership of Tom Mayes, has team taught a preservation law course in the University of Maryland's graduate program on historic preservation. In addition to developing and routinely updating a course book for the

class, Tom Mayes, Julia Miller, Paul Edmondson, and Ross Bradford taught classes for the Spring, 2007 term on federal, state, and local preservation law, constitutional law, easements, and archaeology. In February 2007, Betsy Merritt lectured before a University of

Virginia historic preservation law class and Ross Bradford spoke on easements for Goucher College's introductory class on historic preservation. Betsy Merritt, Paul Edmondson, and Tom Mayes also presented lectures on preservation law at Columbia University last fall.

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## CONTRIBUTORS, SPONSORS, AND SUPPORTERS . . .

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