



# United States Department of the Interior

NATIONAL PARK SERVICE  
Golden Gate National Recreation Area  
Fort Mason, San Francisco, California 94123

IN REPLY REFER TO:  
L76 (GOGA-PLAN)

Mr. Mark Delaplaine  
Federal Consistency Manager  
California Coastal Commission  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105-2219

Subject: Request for consistency determination with CZMA

Dear Mr. Delaplaine:

The National Park Service requests a consistency determination for the draft General Management Plan/Environmental Impact Statement (GMP/EIS) for the Golden Gate National Recreation Area (GGNRA) and Muir Woods National Monument. A copy of the plan was mailed to the California Coastal Commission (CCC) in September of 2011. A copy of this plan was also sent to the San Francisco Bay Conservation and Development Commission. This plan will guide the management of the GGNRA for the next 20 years. The plan is broad, as the intent of a general management plan is to set the overall direction for a unit of the national park system. With this letter we are requesting your review and concurrence of the draft plan per the Coastal Zone Management Act and its implementation in California via the California Coastal Management Program.

The NPS preferred management alternative for park lands in Marin, San Francisco, and San Mateo Counties is Alternative 1, "Connecting People with Parks." Under this alternative, the park would engage the community and other potential visitors in the enjoyment, understanding, and stewardship of park resources and values. Park management would focus on ways to attract and welcome people, connect people with resources, and promote understanding, enjoyment, preservation and health.

The NPS preferred management alternative for Muir Woods National Monument and Alcatraz Island is Alternative 3, "Focusing on National Treasures." Under this alternative, the NPS would place an emphasis on the park's nationally important natural and cultural resources. The fundamental resources of each showcased site would be managed at the highest level of preservation to protect the resources and to promote appreciation, understanding, and enjoyment of those resources.

Pages three through five of this letter show the alignment and consistency between planning and management policies from the California Coastal Act and the policies, strategies, and goals contained within the draft GMP for the GGNRA.

Implementation of the policies and recommendations described in the GMP (the preferred alternative and elements common to all management alternatives) would have long-term, beneficial, negligible to moderate impacts on natural resources in the GGNRA and Muir Woods National Monument. Project-specific consultation with the California Coastal Commission and other federal, state, and local agencies would occur in the future as specific components of the plan are carried out. Part 8 of Volume Two in the GMP provides a detailed description of the potential environmental consequences associated with implementing this plan.

Thank you in advance for your review of this request. If you reply to this request by mail, please send the reply to the address on the letterhead to my attention. If you have any questions, please feel free to contact me at Nancy\_Hornor@nps.gov, 415.561.4937 or Brian Aviles, project manager, at Brian\_Aviles@nps.gov or 415.561.4942.

Sincerely,

Nancy Hornor  
Chief of Planning

## **Consistency between the California Coastal Act and the Golden Gate National Recreation Area Draft GMP**

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The overall approach to management described in the draft GMP is consistent with, and not limited to, the following planning and management policies from Chapter 3 of the California Coastal Act.

### ***California Coastal Act- Section 30210 Access; recreational opportunities; posting***

*“Maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.”*

- **GGNRA Draft GMP**- The plan aims to improve visitor access to and within park lands and to enhance options for sustainable, multimodal transportation. These strategies include, but are not limited to, expanding regional park ferry access, adding new ferry departure points for Alcatraz Island, expanding the Muir Woods shuttle, and reducing congestion by improving automobile circulation in certain areas. The plan aims to expand non-motorized access and better connect communities to park lands through improvements to the park’s existing trail system and linking park trails with local and regional trail networks. Wayfinding signage along trails and roadways would be improved to help visitors find their way to various park sites.

### ***California Coastal Act- Section 30211 Development not to interfere with access***

*“Development shall not interfere with the public's right of access to the sea.”*

- **GGNRA Draft GMP** - Potential new developments described in the draft GMP are intended to improve the quality of the visitor’s experience of park resources and generally, to improve public access. The NPS would use sustainable approaches for improving existing facilities such as trailheads, parking lots, campsites, picnic areas, and restrooms. New facilities would be developed to improve visitor services and to support the park’s growing stewardship programs. Detailed site specific studies and plans would be undertaken before new facilities are constructed. These site specific studies and plans would be carried out with the appropriate environmental compliance and consultation with federal, state, and local agencies.

### ***California Coastal Act- Section 30220 Protection of certain water-oriented activities***

*“Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.”*

- **GGNRA Draft GMP** -The Management Zones section included in Volume One of the draft GMP (page 57) describes the proposed management zones for the park. Water-oriented recreational activities are permitted in a wide variety of management zones, including Diverse Opportunities Zones, Scenic Corridor Zones, Evolved Cultural Landscape Zones, and Natural Zones. Water and marine oriented recreational activities that could be permitted in these zones include surfing, swimming, kayaking, fishing, boating, and crabbing.

***California Coastal Act- Section 30221 Oceanfront land; protection for recreational use and development***

*“Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.”*

- **GGNRA Draft GMP** - The majority of park lands in all three counties that provide access to the coast fall under two types of management zones: Diverse Opportunities Zones and Natural Zones. A wide range of recreational uses could be permitted in these two zones. These include, but are not limited to, the following land based activities: walking and running, hiking, biking, picnicking, developed camping, horseback riding, bird and wildlife viewing, photography and other artistic endeavors, and family events and community celebrations.

***California Coastal Act- Section 30230 Marine resources; maintenance***

*“Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance.”*

- **GGNRA Draft GMP** -The Ocean Stewardship section included in the draft GMP (page 129 in Volume One) articulates the park’s ocean and marine resources stewardship policy and describes specific goals and strategies. Specific strategies include:
  - Strategy 1.1: Expanding current collaboration and strengthening communication with a variety of agencies for the management of ocean resources.
  - Strategy 2.2: Park staff will identify and quantify threats to marine resources including those associated with climate change and land- and water-based activities.
  - Strategy 2.3: Through the establishment of sensitive resource zones and special closure areas, the park will protect the most sensitive biological resources from disturbance.

***California Coastal Act- Section 30231 Biological productivity; water quality***

*“The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored.”*

- **GGNRA Draft GMP** - The management plan aims to strengthen the integrity and resilience of coastal ecosystems by filling habitat gaps, creating habitat links, providing for the recovery of special status species, and the survival of wide-ranging wildlife. The management zoning and potential boundary modifications described in the plan are intended to restore natural processes and ecosystem capacity and respond to the effects of climate change on park resources. Specific strategies in the Ocean Stewardship section include:
  - Strategy 2.4: Park staff will engage in restoration of estuarine and coastal wetland habitats and assess new restoration opportunities in response to changes from climate change.
  - Strategy 2.9: Park staff will work with local, regional, and state agencies to reduce point and nonpoint pollution sources within and adjacent to the park

and improve water quality in the marine and estuarine waters by implementing best management practices.

***California Coastal Act- Section 30240 Environmentally sensitive habitat areas; adjacent developments***

*“Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.”*

- **GGNRA Draft GMP** - Natural resources that are highly sensitive to a variety of activities would receive a high level of protection from the NPS through the use of the Sensitive Resource management zone. Resources contained within this zoning designation would be managed to preserve their fundamental values, and would be monitored and studied for scientific purposes. Access to these areas would be highly controlled. These areas could be subject to closures, and access could be restricted to less sensitive edges of the zone.

***California Coastal Act- Section 30251 Scenic and visual qualities***

*“The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance.”*

- **GGNRA Draft GMP** - For site-specific projects and developments, the NPS will use mitigative measures to minimize visual intrusions and preserve the scenic qualities of park lands and coastal resources. Park facilities would be designed, sited, and constructed to avoid or minimize visual intrusion into the natural environment or landscape. Vegetative screening would also be provided, where appropriate. Where appropriate, facilities such as boardwalks and fences would be used to route people away from sensitive natural areas and cultural resources while still permitting access to important viewpoints. Implementation plans for site specific projects will be prepared with appropriate environmental compliance and consultation with federal, state, and local agencies.