

Comments on Golden Gate NRA GMP Team Draft, Parts I and II
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Part I, Implementation Plans, p. 140 - This section lists studies and plans that would need to be carried out following adoption of the GMP so that implementation could be carried out appropriately with regard to laws, regulations and policies for the treatment of park resources. The cultural resources areas in this section are almost entirely blank. Compiling lists of studies to be carried out for the proper treatment of cultural resources will provide critically important guidance for the future. In order to devise useful lists, the cultural resources division needs time to review and absorb in enough depth the preferred alternatives as a means of projecting baseline and other kinds of studies and plans that would need to be carried out to ensure the proper treatment of cultural resources within the GMP implementation horizon. **I tend to agree, but addressing this question as recommended requires immediate and extensive park staff input. Unrau**

Part I, Mitigative (Mitigation?) Measures, p. 323-325 – This Section briefly touches on National Historic Preservation Act Section 106 compliance. Much of the Section 106 consultation process remains to be carried out. At the point when we have done more consultation with the California State Historic Preservation Office and Advisory Council on Historic Preservation, we will be in a better position to describe how Section 106 issues are being addressed. For example, I think there is a strong possibility that we will complete a new, park-wide Section 106 Programmatic Agreement (PA) in conjunction with completing the GMP and EIS. That is what can be described in this section. Further, through the Section 106 process I imagine we will develop a series of mitigation measures tailored specifically to the preferred alternatives and to the nature of how Golden Gate operates. All of this would be captured in the new PA, and it could be described here. The mitigation measures listed here are not particularly objectionable, but they're generic and not terribly useful as strategies for future management of cultural resources in the park. Akin to the comment above, the cultural resource division needs time to absorb the preferred alternatives and to develop appropriate mitigation measures; and it needs to do this in consultation with the SHPO, with the ACHP, and with other interested parties, such as American Indians. **It is unclear when and if the new PA will be completed; accordingly, the GMP has to go with available information even if generic. Unrau**

Part I, Appendix C, NPS Policies, Desired Conditions and Strategies, p. A-34 – A-37 – The series of strategies listed here for cultural resources are entirely generic, they aren't specific to the GMP. As a result, they aren't at all useful. For example, these strategies are all included in DO/NPS-28, the cultural resources management guideline. They're what we do already, and under any circumstances, so listing them here does not provide us with any enhanced guidance or vision as we implement the GMP. Here again, as a division, cultural resources needs to understand the preferred alternatives in depth so that strategies and desired conditions for cultural resources in our park--specifically in the areas where the GMP will create change--can be articulated here. That kind of specificity would build upon and supplement general policy guidance in a manner that would make us, and future employees, better informed and equipped to carry out cultural resource management. **I tend to agree, but addressing this question as recommended requires immediate and extensive park staff input. Unrau**

Part II, Affected Environment, Cultural Resources, p. 419-437 - The first portion of this section, which lists NHLs and National Register properties within the park, is more-or-less okay. The second portion of this section, starting on p. 429, needs considerable work. The most effective way to devise what information this section should include and the way that it is crafted would again be for the cultural resources division to work as a group to flesh it out. The information in this section needn't be exceptionally lengthy or detailed, but it needs to be authoritative. It needs to provide a snap-shot of cultural resources in the park at the present time, indicating what we know about cultural resources as well as what we don't know. Unfortunately, the information about cultural resources at Golden Gate is far-flung and disparate, it is not synthesized, and that makes the job of writing this section difficult. Nonetheless, the job of this section is to synthesize this disparate information so that the park has a solid base of information for future cultural resources management. Again, those best positioned to help with this necessary synthesis are current staff within cultural resources. **I think the material starting on p. 429 is generally acceptable per revision based on addressing comments. However, if the issues raised in this paragraph are to be addressed as recommended, immediate and extensive park staff input is required. Unrau**

Part II, Environmental Impacts Common to All, Cultural Resources, p. 529-531 - This section describes a series of programs or initiatives that the park plans to embark on during the implementation horizon for the GMP. The section aims to satisfy the National Historic Preservation Act Section 106 requirement for determining what effect all these programs will have on cultural resources by concluding that they will not have an adverse effect on historic properties. Judging from the information provided in the Draft EIS, this finding is baseless. In order to determine an effect under the National Historic Preservation Act, you need to know what historic property is involved and what action you are taking that could potentially affect that historic property. The Draft EIS doesn't provide any of this information for any of the programs/initiatives listed here. Thus, there is no way you can determine with any credibility what the effect of these programs/initiatives would be on cultural resources. To demonstrate this point consider lines 23-26 on page 530, which describe continued transportation planning. The park just completed the Headlands transportation plan, which is a good plan that will do some good things for cultural resources. But the Headlands plan also included several serious adverse effects on the Forts Baker, Barry and Cronkhite National Register district. So it isn't credible to list this ambitious series of programs/initiatives without knowing the actions that they will entail and without knowing the resources that will be affected and to say that all together it will not have an adverse effect on historic properties. In fact, if carried out, this series of programs/initiatives almost certainly will have adverse effects. There's a big question here, and that question is....how do we wrap our heads around this series of ill-defined programs/initiatives and make credible statements about identifying cultural resources and treating them amidst park activities that have their own sets of goals. This is another area where the cultural resources division really should sit down together and puzzle this out. **General management plans are "general" and "conceptual" by nature and definition; recommendations in this paragraph are not consistent with the requirements for general management planning. However, if the issues raised in this paragraph are to be addressed as recommended, immediate and extensive park staff input is required. Unrau**

Part II, Potential Environmental Impacts at Golden Gate, Cultural Resources, p. 579-604 - To a lesser degree, my previous comment about impacts common to all alternatives also applies to this section, where impacts of the different alternatives are considered. My previous comment showed how there was no basis for making a National Historic Preservation Act Section 106 finding of effect for the actions common to all alternatives because we don't know what the actions entail and we don't know what resources might be affected by those ill-defined actions. The difference in this section is that we have a better idea, albeit a conceptual one, of what the action will be, and we also pretty much know what historic properties exist where we will take actions. Thus, we can project how historic properties will be affected by the proposed action. This more-or-less appears to be the way analysis of effects on historic properties was carried out for the alternatives, but due to the sweeping manner with which findings of effect are presented, it's extremely difficult to discern how credible and complete they are. Take lines 11-44 on page 588 as an example. In this one paragraph are included findings of effect for all of the historic properties in the park except for Alcatraz and Muir Woods. That's 20 or so National Register properties encompassing hundreds of specific historic features spanning three counties, and the effects of the alternative on this vast amount of resources is captured in one paragraph! To say that this is painting with too broad a brush is a huge understatement. What to do? Though we probably need more detail, and probably need more explanation, I wouldn't advocate for a super-detailed, super-long, effects section. We do need to demonstrate that we have a certain mastery/understanding of what our resources are, as well as a certain mastery over what the projected effects are. I think demonstrating this will entail putting together an effects section that has a more deliberate style. The kinds of approaches we should consider are as follows: instead of cramming lots of information about lots of places into long paragraphs, break information down into digestible forms, maybe organizing information by place; at some level, we need to create lists of resources and indicate what the treatment is for each resource--in my experience, these kinds of lists are very useful for future managers who will use the GMP as a tool, and they will demonstrate to others, such as the SHPO, that we have considered the treatment of resources on a feature-by-feature basis; maps would be an enormous help--they could help us establish areas of potential effect, something we're required to do under Section 106 of the National Historic Preservation Act which this draft hasn't done, they could help describe effects, and they could help in our demonstration that we have a handle on how the alternatives will affect cultural resources. Finally, I think this is another area where it would be very important for the cultural resources division to look at the alternatives on a site-by-site basis to ensure that the effects are accurately captured and described.

The previous comment applies to all the sections that assess effects of alternatives on cultural resources: 1) Part II, Potential Environmental Impacts at Muir Woods, Cultural Resources, p. 668-677; 2) Part II, Cumulative Impacts Golden Gate, Cultural Resources, p. 710-713; 3) Part II, Cumulative Impacts Muir Woods, Cultural Resources, p. 726-727. **General management plans are "general" and "conceptual" by nature and definition; recommendations in this paragraph are not consistent with the requirements for general management planning. However, if the issues raised in this paragraph are to be addressed as recommended, immediate and extensive park staff input is required. Unrau**