

GOGO/MUWO Draft GMP (Volume 2), September 2009 – Greg Cody’s Comments, October 28, 2009

#	Page/Line/Section	Comment/Proposed Revision	DSC Response
1.	General Comment	Historic buildings and structures are variously referred to in the table of contents and in text headings throughout the document as historic buildings (pages, iv, vi, 586), historic structures (page 347), and prehistoric and historic structures (pages iv, 519). I recommend using the term historic buildings and structures consistently throughout the document.	(Also See “Part II – General – Cody Comments”) My general response to Cody’s comments are that they are somewhat confusing to address in that many refer back to previous comments. At points, Cody changes course in terms of some recommendations, thus forcing one to retrace one’s steps in revision. By applying Cody’s comments, many conclusions necessarily end up “adverse effect.” I have attempted to apply Cody’s expertise as seems warranted.
2.	Page 348, Indian Trust Resources, 2 nd Paragraph	I recommend deleting the reference to sacred sites. Indian trust resources and sacred sites are not the same thing. Sacred sites should be addressed under ethnographic resources on page 347 (i.e. there are no sacred sites in the park or monument).	(Also See “Part II – General – Cody Comments”)
3.	Page 432, lines 32-33	The text states that “[c]urrently, there are no identified ethnographic resources within the boundaries of Golden Gate National Recreation Area...” Yet, the next clause (lines 33-34) states “...Alcatraz Island has very important historical significance to American Indians.” In addition, on page 433 (lines 35-37) the text states “[t]he National Park Service works with Ohlones in stewarding the preservation and interpretation of ancestral sites in the Presidio and throughout the park south of the Golden Gate,” and on pages 433-434 (lines 46-1) the text states “...this magnifies the significance of indigenous archeological sites as focal points of native heritage today. Providing stark evidence of the presence of native people on parklands in the past, these sites serve as the platform upon which Coast Miwoks and Ohlones today stand and proclaim their existence.” The preceding statements, as well as many others in the document, indicate that there are ethnographic resources in GOGA.	Retain – language in the text reflects information provided by Scolari – park cultural resource staff agreed to concept that Alcatraz has ethnographic significance, although no specific ethnographic sites are identified – this sort of opens us up to anomalous questions: if Alcatraz has ethnographic significance why isn’t it a site (however, I am

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			going with my understanding of the park staff’s input on this issue)
4.	Pages 432-435	Are there ethnographic resources in GOGA associated with groups other than American Indians? The text doesn’t address this possibility.	None that I know of – none have come up in discussions with park staff
5.	Page 434, lines 1-3	I suggest deleting the sentence that begins “[p]roviding stark evidence...,” The paragraph can stand alone without it, and the clause “...these sites serve as the platform upon which Coast Miwoks and Ohlones today stand and proclaim their existence” is a bit over the top.	Done
6.	Page 434, lines 14-17	I recommend revising the sentence that begins “[t]he greatest threat of all...” to read: In addition, because only a small fraction (approximately 10 percent) of the park has been surveyed for archeological sites, the park lacks the baseline information to fully support the management, protection, understanding, and interpretation of archeological resources.	Done
7.	Pages 436-437	There is no discussion of whether or not Muir Woods has known archeological or ethnographic resources. There is no discussion of cultural landscapes, although the discussion of the historic district on page 437 (lines 3-9) indicates that there is at least one landscape of note.	Done – Stephan Nofield should review what I did
8.	Page 530, lines 4-11 & 27-31	<p>To more fully expand upon the potential effects to archeological resources, historic structures, and cultural landscapes associated with facility development and expansion of the trail system, as well as mitigative measures, I recommend replacing the existing text with text similar to the following (edit as necessary):</p> <p>Development of new or improved maintenance hubs, a public safety hub, and satellite maintenance offices, as well as expanding the park’s trail system and improving its connectivity and accessibility, could adversely impact the park’s archeological resources. As appropriate, archeological surveys and/or monitoring would precede any ground disturbance. National Register eligible or listed archeological resources would be avoided to the greatest extent possible. If such resources could not be avoided, an appropriate mitigation strategy would be developed in consultation with the California state historic preservation officer and, if necessary, associated American Indian tribes. If during construction previously unknown archeological resources were discovered, all work in the immediate vicinity of the discovery would be halted until the resources could be identified and documented and, if the resources cannot be preserved <i>in situ</i>, an appropriate mitigation strategy developed in consultation with the state historic preservation officer and associated American Indian tribes. Because National Register eligible or listed archeological resources would be avoided to the greatest extent possible, any adverse effects would be expected to be minor to moderate in intensity and permanent.</p> <p>Archeological resources adjacent to or easily accessible from trails and developed areas could be vulnerable to surface disturbance, inadvertent damage, and vandalism. A loss of surface archeological materials, alteration of artifact distribution, and a reduction of contextual evidence could result. However, continued ranger patrol and emphasis on visitor education would discourage vandalism and inadvertent destruction of cultural remains, and any adverse impacts would be expected to be negligible to minor if any.</p> <p>Every effort would be made to establish new or improved maintenance hubs, a public safety hub, and satellite maintenance offices existing developed areas or in rehabilitated historic buildings whose architectural values are protected and preserved. Careful design of new facilities would ensure that new buildings and structures would minimally affect the</p>	Done

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		scale and visual relationships among existing landscape features or circulation patterns and features. In addition, the topography, native vegetation patterns, and land use patterns would remain largely unaltered. Any adverse impacts would be long-term and of minor intensity. Improved maintenance facilities and programs would enable the park to conduct more comprehensive cultural resource preservation and maintenance programs and thus enhance protection of the park’s cultural resource values – a beneficial impact.	
9.	Page 531, lines 5-8	The conclusion would need revision to address the above comment.	Done
10.	Page 580, lines 12-14	I recommend revising the sentence to read: The lack of survey and knowledge and possible loss of integrity from natural processes and human activities, as described above, could have....	Done
11.	Page 580, lines 23-24	I recommend revising the sentence to read: The lack of survey and knowledge and possible loss of integrity from natural processes and human activities, as described above, could have....	Done
12.	Page 580, lines 34-41	What is the intensity and duration of potential adverse impacts?	Done
13.	Pages 580-581, lines 42-43 & 1-9	What is the intensity and duration of potential adverse impacts?	Done
14.	Page 581, lines 10-17	What is the intensity and duration of potential adverse impacts?	Done
15.	Pages 580-581, Alternative 1	<p>To more fully expand upon the potential effects to archeological resources, I suggest incorporating text similar to the following into the impact analysis (the following is provided as an example, edit as necessary):</p> <p>Archeological sites continually deteriorate, due primarily to the effects of weather and gravity. Left alone, sites will inevitably degrade over time. However, impacts from human visitation and use contribute to the effects of natural agents of deterioration, and can substantially increase the rate of site deterioration. Archeological resources adjacent to or easily accessible from visitor use areas or trails would continue to be vulnerable to inadvertent damage and vandalism. Inadvertent impacts would include picking up or otherwise displacing pottery sherds and other artifacts, the compaction of cultural deposits, and the creation of social trails (which can lead to erosion and destabilization of the original site architecture). Intentional vandalism includes removing artifacts and probing or digging in sites. Inadvertent damage or vandalism would result in a loss of surface archeological materials, alteration of artifact distribution, and a reduction of contextual evidence. Many such adverse impacts could be mitigated through additional stabilization of the site, the elimination of social trails to disturbed or vulnerable sites, and/or systematically collecting surface artifacts for long-term curation. Continued ranger patrol and emphasis on visitor education, regarding the significance and fragility of such resources and how visitors can reduce their impacts to archeological resources, would discourage vandalism and inadvertent impacts and minimize adverse impacts. The actions under this alternative could result in minor to moderate, permanent adverse impacts to archeological resources.</p> <p>Also, on page 588 (the analysis of potential impacts to historic buildings under Alternative 1), the text states that “[h]istoric buildings associated with historic coastal fortifications in the Marin Headlands would be rehabilitated, stabilized, allowed to deteriorate naturally, or removed if they become unsafe.” In addition, the text on page 589 states, with regard to Alcatraz Island, “[o]ther historic buildings would be stabilized, rehabilitated, allowed to deteriorate naturally, or be removed....” These actions and their potential impacts are not addressed under potential impacts to archeological resources in the discussion of Alternative 1. I recommend adding text similar to the following:</p> <p>Prior to demolition of any National Register listed or eligible building or structure, a survey for archeological resources in the general vicinity of the affected structure would be designed and conducted in consultation with the appropriate state historic preservation office. The excavation, recordation, and mapping of any significant cultural remains would be</p>	Done

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		completed prior to demolition, to ensure that important archeological data that otherwise would be lost is recovered and documented. Adverse impacts to affected archeological resources would be permanent and of moderate to major intensity.	
16.	Page 581, Alternative 1	The analysis of potential impacts lacks a cumulative impacts discussion.	Cumulative impacts covered comprehensively at back of document
17.	Page 581, Conclusion	(1) The conclusion section should be used to present the bottom line of the analysis section. As written there are no impact intensities or durations associated with potential impacts presented. (2) Due to the seeming potential for moderate adverse impacts to archeological resources, how can the team be sure that the Section 106 determination of effect would be <i>no adverse effect</i> ?	Done
18.	Page 581, Conclusion	This alternative would also result in adverse effects to historic properties under Section 106 (see preceding comments).	Done
19.	Pages 581-582, Alternative 2	(1) The discussion lacks any identification of impact intensities or durations associated with potential impacts. (2) See comment #15. (3) The analysis of potential impacts lacks a cumulative impacts discussion. (4) The conclusion section should be used to present the bottom line of the analysis section. As written there are no impact intensities or durations associated with potential impacts presented. (5) Regarding lines 32-34, this alternative would also result in adverse effects to historic properties under Section 106 (see preceding comments).	Done – See my previous comment on cumulative impact.
20.	Pages 582-583, Alternative 3	(1) The discussion lacks any identification of impact intensities or durations associated with potential impacts. (2) See comment #15. (3) The analysis of potential impacts lacks a cumulative impacts discussion. (4) The conclusion section should be used to present the bottom line of the analysis section. As written there are no impact intensities or durations associated with potential impacts presented.	Done – See my previous comments regarding cumulative impacts.
21.	Page 583, line 14	According to NPS 28, <i>Cultural Resource Management Guideline</i> , “[a]rcheological sites and structures will not be rehabilitated, restored, or reconstructed” (p. 85).	Done
22.	Page 583, lines 27-28	This alternative would also result in adverse effects to historic properties under Section 106 (see preceding comments).	Done
23.	Page 583, line 34	See comment #3 regarding statement that there are no identified ethnographic resources within GOGA or on Alcatraz Island.	See my response to Comment #3
24.	Page 584, lines 10-11	Because there are no intensity threshold definitions specifically for beneficial impacts under ethnographic resources (pages 520-521), and because the intensity threshold definitions don’t work for both potential adverse and beneficial impacts, I recommend revising the sentence to read: This action would have a long-term beneficial impact to ethnographic resources. Note: The above comment is true for each impact topic. In the analyses of potential impacts to archeological resources, historic buildings and structures, cultural landscapes, and ethnographic resources, I recommend simply referring to beneficial impacts rather than negligible, minor, moderate, or major beneficial impacts.	Done

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25.	Page 584, No Action Alternative	The analysis of potential impacts lacks a cumulative impacts discussion.	See my previous comments regarding cumulative impacts.
26.	Page 584, lines 13-18	The conclusion would need revision to address the above two comments.	Done
27.	Page 584, Alternative 1	See comments #3, 24, and 25. Also, the analysis of potential impacts lacks a cumulative impacts discussion.	Done – See my previous comments regarding cumulative impacts.
28.	Page 585, lines 3-5	See comment #3.	Done
29.	Page 585, lines 6-8	Why isn’t this statement also true of the other alternatives.	Done – Included this statement in Alt. 2 but not Alt. 3
30.	Page 585, lines 16-17	See comment #24.	Done
31.	Page 585, Alternative 2	The analysis of potential impacts lacks a cumulative impacts discussion.	See my previous comments regarding cumulative impacts.
32.	Page 585, lines 19-26	The conclusion would need revision to address the above comments.	Done
33.	Page 585, lines 34-36	See comment #3.	Done
34.	Pages 585-586, lines 37-43 & 3-10	See comment #24.	Done
35.	Page 586, line 5	Depending upon what the ethnographic resources are, they may not be able to be rehabilitated or restored (archeological resources).	Done
36.	Page 586, Alternative 3	The analysis of potential impacts lacks a cumulative impacts discussion.	See my previous comments regarding cumulative impacts.
37.	Page 586, lines 12-20	The conclusion would need revision to address the above two comments.	Done
38.	Page 586, line 34	I suggest appending the following text to the end of the sentence on line 34: The surveys and research necessary to determine the eligibility of a structure, district, or landscape for listing in the National Register of Historic Places are a prerequisite for understanding the resource’s significance, as well as the basis of informed decision-making in the future regarding how the resource should be managed. Such surveys and research would be a beneficial long-term impact.	Done
39.	Page 587, line 2	See comment #24.	Done
40.	Page 587, No Action Alternative	The analysis of potential impacts lacks a cumulative impacts discussion.	See my previous comments regarding cumulative impacts.
41.	Page 587, lines 29-30	See comment #24.	Done
42.	Page 588, line 10	See comment #24.	Done
43.	Page 588, line 22	The analysis refers to the allowing historic buildings to naturally deteriorate or having them removed. I recommend addressing these actions in a separate paragraph and incorporating the following text:	Done

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		No National Register listed or eligible structure would be removed or allowed to decay naturally (“molder”) without prior review by park and region cultural resource specialists, including approval by the regional director, and consultation with the California state historic preservation office. Before a National Register listed or eligible structure is removed or allowed to molder, appropriate documentation recording the structure would be prepared in accordance with Section 110 (b) of the National Historic Preservation Act and the documentation submitted to the HABS/HAER/HALS program.	
44.	Page 588, line 44	See comment #24. Also, the text concludes that “[a]ll these actions would result in long-term, negligible, beneficial impacts,” however, the preceding analysis discusses the natural deterioration and removal of historic buildings which are adverse effects. The beneficial impact is an erroneous conclusion for all of the preceding actions described.	Done
45.	Page 589, line 13	See comment #43	Done
46.	Page 589, line 15	See comment #24. Also, the text concludes that “[a]ctions associated with historic buildings on Alcatraz Island would have a negligible to minor, beneficial impacts [sic],” however, the preceding analysis discusses the natural deterioration and removal of historic buildings which are adverse effects. The beneficial impact is an erroneous conclusion for all of the preceding actions described.	Done
47.	Page 589, Alternative 1	Would an impact analysis similar to the following be applicable to the actions under this alternative: Historic structures could suffer wear and tear from increased visitation, but monitoring the carrying capacity of historic structures could result in the imposition of visitation levels or constraints that would contribute to the stability or integrity of the resources without unduly hindering interpretation for visitors. Unstaffed or minimally staffed structures could be more susceptible to vandalism. However, continued ranger patrol and emphasis on visitor education, regarding the significance of such resources and how visitors can reduce their impacts to historic resources, would discourage vandalism and inadvertent impacts and minimize adverse impacts. Adverse impacts would be long-term and negligible to minor in intensity. Also, the analysis of potential impacts lacks a cumulative impacts discussion.	Done. Incorporated this paragraph in conclusion – See my previous comments regarding cumulative impacts.
48.	Page 589, Conclusion	The conclusion would need revision to address the above comments.	Done
49.	Page 589, lines 23 & 30	See comment #24.	Done
50.	Page 589, lines 31-33	This alternative would also result in adverse effects to historic properties under Section 106 (see preceding comments).	Done
51.	Page 590, lines 9-10	See comment #43.	Done
52.	Page 590, lines 26-27	See comment #24.	Done
53.	Page 591, line 5	See comment #24.	Done
54.	Page 591, line 10	With regard to the statement “...while some buildings could be lost overtime...,” see comment #43.	Done
55.	Page 591, lines 18-19	See comment #43.	Done
56.	Pages 589-591, Alternative 2	Would an impact analysis similar to the following be applicable to the actions under this alternative: Historic structures could suffer wear and tear from increased visitation, but monitoring the carrying capacity of historic structures could result in the imposition of visitation levels or constraints that would contribute to the stability or integrity of the resources without unduly hindering interpretation for visitors. Unstaffed or minimally staffed structures could be	Done. Incorporated this paragraph into conclusion – See my previous comments regarding cumulative

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		<p>more susceptible to vandalism. However, continued ranger patrol and emphasis on visitor education, regarding the significance of such resources and how visitors can reduce their impacts to historic resources, would discourage vandalism and inadvertent impacts and minimize adverse impacts. Adverse impacts would be long-term and negligible to minor in intensity.</p> <p>Also, the analysis of potential impacts lacks a cumulative impacts discussion.</p>	impacts
57.	Page 591, Conclusion	The conclusion would need revision to address the above comments.	Done
58.	Page 592, lines 1-3	This alternative would also result in adverse effects to historic properties under Section 106 (see preceding comments).	Done
59.	Page 592, line 18	See comment #24.	Done
60.	Page 592, lines 28-29	See comment #43.	Done
61.	Page 593, line 17	<p>See comment #24.</p> <p>Also, the text concludes that “[t]he above actions would have long-term, negligible and beneficial impacts on the park’s historic buildings,” however, the preceding analysis discusses the natural deterioration and removal of historic buildings which are adverse effects. The beneficial impact is an erroneous conclusion for all of the preceding actions described.</p>	Done
62.	Page 593, line 29	See comment #24.	Done
63.	Page 593, lines 23-24	See comment #24.	I don’t understand how Cody’s Comment #24 applies to these lines
64.	Page 593, lines 25-26	<p>See comment #24.</p> <p>Also, the text concludes that “[t]he above actions would have long-term, negligible and beneficial impacts on the park’s historic buildings,” however, the preceding analysis discusses the natural deterioration and removal of historic buildings which are adverse effects. The beneficial impact is an erroneous conclusion for all of the preceding actions described.</p>	Done – Some of this is difficult in following Cody’s line of thought
65.	Pages 592-594, Alternative 3	<p>Would an impact analysis similar to the following be applicable to the actions under this alternative:</p> <p>Historic structures could suffer wear and tear from increased visitation, but monitoring the carrying capacity of historic structures could result in the imposition of visitation levels or constraints that would contribute to the stability or integrity of the resources without unduly hindering interpretation for visitors. Unstaffed or minimally staffed structures could be more susceptible to vandalism. However, continued ranger patrol and emphasis on visitor education, regarding the significance of such resources and how visitors can reduce their impacts to historic resources, would discourage vandalism and inadvertent impacts and minimize adverse impacts. Adverse impacts would be long-term and negligible to minor in intensity.</p> <p>Also, the analysis of potential impacts lacks a cumulative impacts discussion.</p>	Done. Incorporated paragraph into conclusion – See my previous comments regarding cumulative impacts.
66.	Page 594, Conclusion	The conclusion would need revision to address the above comments.	Done
67.	Page 594, line 37, & Page 595, line 4	See comment #24.	Done
68.	Page 595, lines 5-7	This alternative would also result in adverse effects to historic properties under Section 106 (see preceding comments).	Retained – this alternative should not result in “adverse”

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			effect to historic buildings
69.	Page 595, line 27	See comment #24.	Done
70.	Page 595, No Action Alternative	The analysis of potential impacts lacks a cumulative impacts discussion.	See my previous comments regarding cumulative impacts
71.	Page 596, lines 3, 33, 40, and page 597, lines 5, 18, 34	See comment #24.	Done
72.	Page 596, lines 33-34	The text concludes that “[t]hese actions would have a long-term, negligible and beneficial impact,” however, the preceding analysis discusses the localized deterioration or loss of cultural landscape features which are adverse effects. The beneficial impact is an erroneous conclusion for all of the preceding actions described.	Done
73.	Pages 596-597, Alternative 1	<p>(1) The discussion of potential impacts to historic buildings describes the naturally deterioration or removal of some buildings. Because buildings are important contributing features to cultural landscape, these impacts should be described under cultural landscapes, too. And the potential impacts to cultural landscapes identified as adverse and long-term.</p> <p>(2) Potential impacts to cultural landscapes should be analyzed in terms of how proposed actions would affect significant landscape features and characteristics (natural systems and features, spatial organization, land use, cultural traditions, circulation, topography, vegetation, wild or domestic fauna, buildings and structures, cluster arrangements, small-scale features, constructed water features, views and vistas, and archeological sites). The existing analysis says little or nothing about potential impact to many of the above landscape features and elements. Can more emphasis (is enough information available) be placed on describing potential impacts in terms of how significant landscape features and characteristics would or would not be affected? As is, the analysis is thin.</p> <p>(3) If the answer to #2 above is no, then can more general statements, such as the following, be incorporated?</p> <p>The surveys and research necessary to determine the eligibility of a landscape for listing in the National Register of Historic Places are a prerequisite for understanding the landscape’s significance, as well as the basis of informed decision-making in the future regarding how the landscape and its contributing features and patterns should be managed. Such surveys and research would be a beneficial long-term impact.</p> <p>Careful design would ensure that the rehabilitation or restoration of buildings and structures, the construction of parking areas, and the expansion or development of trails would minimally affect the scale and visual relationships among significant landscape features. In addition, the topography, vegetation, circulation features, and land use patterns of any significant cultural landscape would remain largely unaltered. Any adverse impacts would be long-term or permanent and range in intensity from negligible to minor.</p>	<p>Done – Added words (including historic buildings and structures) under first mention of cultural landscape resources in analysis and conclusion</p> <p>Answer is to #2 is “No”</p> <p>Incorporated paragraphs into analysis text</p>
74.	Pages 596-597, Alternative 2	The analysis of potential impacts lacks a cumulative impacts discussion.	See my previous comments regarding cumulative impacts.
75.	Page 597, Conclusion	The conclusion would need revision to address the above comments.	Done
76.	Page 597, lines 42-43	See comment #24.	Done

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77.	Page 598, line 3	See comment #24.	Done
78.	Page 598, lines 4-6	This alternative would also result in adverse effects to historic properties under Section 106 (see preceding comments).	Done
79.	Page 598, lines 24-25	See comment #24.	Done
80.	Page 599, line 24	See comment #24.	Done
81.	Pages 598-599, Alternative 2	<p>(1) The discussion of potential impacts to historic buildings describes the naturally deterioration or removal of some buildings. Because buildings are important contributing features to cultural landscape, these impacts should be described under cultural landscapes, too. And the potential impacts to cultural landscapes identified as adverse and long-term.</p> <p>(2) Potential impacts to cultural landscapes should be analyzed in terms of how proposed actions would affect significant landscape features and characteristics (natural systems and features, spatial organization, land use, cultural traditions, circulation, topography, vegetation, wild or domestic fauna, buildings and structures, cluster arrangements, small-scale features, constructed water features, views and vistas, and archeological sites). The existing analysis says little or nothing about potential impact to many of the above landscape features and elements. Can more emphasis (is enough information available) be placed on describing potential impacts in terms of how significant landscape features and characteristics would or would not be affected? As is, the analysis is thin.</p> <p>(3) If the answer to #2 above is no, then can more general statements, such as the following, be incorporated?</p> <p>The surveys and research necessary to determine the eligibility of a landscape for listing in the National Register of Historic Places are a prerequisite for understanding the landscape’s significance, as well as the basis of informed decision-making in the future regarding how the landscape and its contributing features and patterns should be managed. Such surveys and research would be a beneficial long-term impact.</p> <p>Careful design would ensure that the rehabilitation or restoration of buildings and structures, the construction of parking areas, and the expansion or development of trails would minimally affect the scale and visual relationships among significant landscape features. In addition, the topography, vegetation, circulation features, and land use patterns of any significant cultural landscape would remain largely unaltered. Any adverse impacts would be long-term or permanent and range in intensity from negligible to minor.</p>	<p>Done – Incorporated words (including historic buildings and structures) after first mention of cultural resources in analysis and conclusion</p> <p>Answer to #2 is “No”</p> <p>Incorporated paragraphs into analysis text – This is very repetitious</p>
82.	Pages 598-599, Alternative 2	The analysis of potential impacts lacks a cumulative impacts discussion.	See my previous comments regarding cumulative impacts.
83.	Page 599, Conclusion	The conclusion would need revision to address the above comments.	Done
84.	Page 600, lines 2-3 & lines 7-8	See comment #24.	Done
85.	Page 600, lines 9-12	This alternative would also result in adverse effects to historic properties under Section 106 (see preceding comments).	Done
86.	Page 601, line 23	See comment #24.	Done
87.	Page 602, lines 12-13	The text concludes that “[t]he above actions would result in negligible and beneficial impacts,” however, the preceding analysis discusses the natural deterioration and removal of cultural landscape resources which are adverse effects. The beneficial impact is an erroneous conclusion for all of the preceding actions described.	Done
88.	Pages 600-602, Alternative 3	(1) The discussion of potential impacts to historic buildings describes the naturally deterioration or removal of some buildings. Because buildings are important contributing features to cultural landscape, these impacts should be described	Done – Incorporated words (including

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		<p>under cultural landscapes, too. And the potential impacts to cultural landscapes identified as adverse and long-term.</p> <p>(2) Potential impacts to cultural landscapes should be analyzed in terms of how proposed actions would affect significant landscape features and characteristics (natural systems and features, spatial organization, land use, cultural traditions, circulation, topography, vegetation, wild or domestic fauna, buildings and structures, cluster arrangements, small-scale features, constructed water features, views and vistas, and archeological sites). The existing analysis says little or nothing about potential impact to many of the above landscape features and elements. Can more emphasis (is enough information available) be placed on describing potential impacts in terms of how significant landscape features and characteristics would or would not be affected? As is, the analysis is thin.</p> <p>(3) If the answer to #2 above is no, then can more general statements, such as the following, be incorporated?</p> <p>The surveys and research necessary to determine the eligibility of a landscape for listing in the National Register of Historic Places are a prerequisite for understanding the landscape’s significance, as well as the basis of informed decision-making in the future regarding how the landscape and its contributing features and patterns should be managed. Such surveys and research would be a beneficial long-term impact.</p> <p>Careful design would ensure that the rehabilitation or restoration of buildings and structures, the construction of parking areas, and the expansion or development of trails would minimally affect the scale and visual relationships among significant landscape features. In addition, the topography, vegetation, circulation features, and land use patterns of any significant cultural landscape would remain largely unaltered. Any adverse impacts would be long-term or permanent and range in intensity from negligible to minor.</p>	<p>historic buildings and structures) after first mention of cultural resources in analysis and conclusion</p> <p>Answer to #2 is “No”</p> <p>Incorporated paragraphs into analysis text – this is very repetitious</p>
89.	Pages 600-602, Alternative 3	The analysis of potential impacts lacks a cumulative impacts discussion.	See my previous comments on cumulative impacts.
90.	Page 602, Conclusion	The conclusion would need revision to address the above comments.	Done
91.	Page 600, lines 22-23 & lines 27-28	See comment #24.	Done
92.	Page 600, lines 9-12	This alternative would also result in adverse effects to historic properties under Section 106 (see preceding comments).	Done
93.	Page 603, lines 36-37	If museum collections are acquired, accessioned and cataloged, preserved, protected, and made available for access and use according to NPS standards and guidelines, then there shouldn’t be an adverse impact associated with their display.	Done
94.	Page 603, lines 39-40 & lines 44-45	See comment #24.	Done
95.	Page 604, Alternative 2	The discussion should make a statement(s) as to how well museum collections would be acquired, accessioned and cataloged, preserved, protected, and made available for access and use according to NPS standards and guidelines	Issue addressed per Fisher’s recommendations which have been incorporated
96.	Page 604, line 16	See comment #24.	Done
97.	Page 604, lines 28	See comment #93.	Done
98.	Page 604, line 31	See comment #24.	Done

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99.	Page 604, line 36	See comment #24.	Done
100.	Pages 705-730	<p>The analysis of cumulative impacts for each impact topic is relegated to the back of the document in Part 10: <i>Other Analyses and Statutory Considerations</i>. The cumulative impacts analysis should not be separated from the analysis of environmental consequences for each impact topic, i.e. under each impact topic for each alternative there should be a cumulative impacts analysis. The outline would be as follows:</p> <p style="padding-left: 40px;">Alternative 1</p> <p style="padding-left: 80px;">Impact Topic Analysis of Direct and Indirect Impacts Cumulative Impacts Analysis Conclusion (including cumulative impact summation and impairment finding)</p> <p>Although this may create redundancy in what is said about cumulative impacts for impact topics between alternatives, it demonstrates that NPS has given consideration to the issue of cumulative impacts for each impact topic under each alternative.</p> <p>In addition, there should be a bottom line for cumulative impacts in each conclusion section under each impact topic for each alternative. The rationale for this is the requisite impairment determination - it is possible to have impairment resulting from cumulative impacts. Consequently, the cumulative impact conclusion or bottom line be a part of the topic's conclusion section so that it precedes the impairment statement we put at the end of our conclusion sections. Thus, for the conclusion section we have (a) identified and characterized the direct and indirect impacts of the alternative, (b) identified and characterized the cumulative impacts; and then (c) provided our conclusion regarding impairment, from which the reader needs to know items (a) and (b).</p>	<p>(Also See “Part II – General – Cody Comments”)</p> <p>See my previous comments regarding cumulative impacts.</p>
101.	Page 754, Section 106 Consultation, 2 nd paragraph	The reference to the 1995 programmatic agreement should be deleted. This document was superseded by a November, 2008 programmatic agreement.	Done
102.	General Comment – Impairment Findings for Cultural Resource Topics	<p>(1) The existing impairment determinations for archeological resources, historic buildings, cultural landscapes, ethnographic resources, and museum collections state that there would be no impairment of the existing resource under discussion, i.e. no impairment of archeological resources would result from this alternative, no impairment of ethnographic resources would result from this alternative, no impairment of historic buildings would result from this alternative, no impairment of cultural landscape resources would result from this alternative, no impairment of museum collections would result from this alternative. Instead, I recommend stating, if the intensity of direct, indirect, and cumulative adverse impacts are negligible to minor, there would be no impairment of park resources or values.</p> <p>(2) If, however, the intensity of potential impacts are moderate – and there are many instances in the analyses of potential impacts are identified as moderate, the following text would be appropriate:</p> <p style="padding-left: 40px;">Because there would be no major, adverse impacts to a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of Golden Gate National Recreation Area; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the park’s general management plan or other relevant National Park Service planning documents, there would be no impairment of the national recreation area’s resources or values.</p>	Done

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#	Page/Line/Section	Comment/Proposed Revision	DSC Response
103.	General Comment, Section 106 Determinations of Effect-No Action Alternative	Because NPS consults with SHPO on actions the agency is proposing, Section 106 determinations of effect are unnecessary under the no action alternative (unless there is a strong likelihood that the no action alternative will be the alternative that is implemented, i.e. selected in the ROD).	Need to discuss with Stephan Nofield
104.	General Comment, Section 106 Determinations of Effect-Action Alternatives	<p>Under the action alternatives there is the potential for adverse effects to archeological resources, cultural landscapes, and historic buildings (e.g. disturbance of unknown archeological resources, moldering of historic buildings, removal of historic buildings). Yet, the Section 106 determinations of effect are invariably identified as <i>no adverse effect</i>. While NPS will avoid adversely affecting historic properties to the greatest extent possible, it is likely that could be adverse effects to archeological resources, cultural landscapes, and historic buildings. Perhaps, the paragraphs describing the Section 106 determinations of effect, where the potential for a moderate effect under NEPA is identified, should be revised as follows (edit as necessary):</p> <p>As described above, impacts associated with implementation of Alternative ? would potentially result in both beneficial and minor to moderate adverse effects under NEPA. If moderate adverse impacts under NEPA can be avoided during implementation of the alternative, the determination of effect under Section 106 of the National Historic Preservation Act would be <i>no adverse effect</i>, as outlined in regulations (36 CFR Part 800, <i>Protecting Historic Properties</i>) issued by the Advisory Council on Historic Preservation (ACHP) . If the moderate adverse impacts cannot be avoided, the determination of effect for Section 106 would be <i>adverse effect</i>. A memorandum of agreement (MOA) would be executed among the National Park Service and the California state historic preservation officer and , if necessary, associated American Indian tribes and the ACHP, in accordance with 36 CFR 800.6(b).</p> <p>The team can decide if the above text is more appropriate.</p>	Need to discuss with Stephan Nofield – Cody concludes that the team should decide if the recommended text is more appropriate.