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cc

bcc

Subject PWR Planning comments on GOGA GMP

Wow, this is a mammoth document! It reflects a tremendous amount of big picture thinking and creative problem solving, as well as a high level of coordination, collaboration and attention to detail. We congratulate the entire team for getting the GMP to this stage. You're nearly there! But of course we have a few comments....

p. 63-103, Common to All. It isn't clear to me why alternatives to some of these action weren't considered. E.g. it seems like there would be several options for how to deal with boundaries, facilities, ocean stewardship, collections, trails.... A sentence or two in each section may suffice - eg. development of this facility is underway and therefore is considered common to all alternatives; or this action is required by NPS policy and so is considered common to all alternatives. Also make sure when you say "common to all" that you mean it is included in the no action alternative as well as the others (vs "common to all action alternatives").

p. 65-67, Boundary Adjustments. You state that these properties all meet the criteria for boundary adjustments. Somewhere in the document (could be an appendix and just referenced here) you should document the analysis of these properties. You need to demonstrate that each one either (paraphrased here, see mgmt policies or GMP sourcebook for the actual language) a) products resources or enhances public enjoyment, b) addresses operation & management issues, or c) is otherwise critical to park purposes. And you need to demonstrate that they are feasible to administer, and that other alternatives for management and resource protection are not adequate. While mgmt policies and the sourcebook both seem to conflate inclusion in a boundary with land acquisition, which is not necessarily the case for these lands, you still should go through the process and present your findings. Doesn't have to be long or detailed, but needs to address the criteria.

p. 107, Start of Ch.4, Alternatives. This section could use an intro explaining how the alternatives are presented - e.g. alternatives for Alcatraz are presented first, No Action alt followed by three action alternatives. Next, alternatives for the marin co, SF and SM sections of the park, no action, followed by three action alternatives. Muir Woods alternatives can be found in Chapter 5. Without that, I had no idea what I was getting into in this chapter, and since it's over 100 pages long, it needs some guidance. That same intro section could also explain what is meant by "the alternatives applied to Golden Gate...". Chapters 1, 2, 3 & 6 have intros, Chapters 4 & 5 need them too.

p. 109-248, Costs. There is going to be considerable sticker shock over these cost,s particularly the capital costs. I think you need to do more to explain and justify them. You also should talk about how partners or donors may pick up much of the cost, and if there are high cost items that will only happen if donations substantially support them, then it would be good to say that, too. You're likely to be asked for considerably more detail on these costs - think about what it took to make the regional directorate comfortable with your Alcatraz facility costs, and assume that WASO will want similar assurances (although few people there know the site, which could work for you or against you - hard to say). I will send you a cost table that Lava Beds put in their GMP that seemed to help (they were told that their one-time costs were high, and they were only \$10M! Smaller park, different situation).

I know you've had considerable cost estimating work done - way more than you want to put into this GMP or present to the general public. It might be worth a discussion with some folks on WASO about how best to approach the cost estimates. Maybe we could give them a greater level of detail than is in the GMP document, in order to increase their comfort level, without having to burden the GMP with all that data. Something to think about.

I think you're going to be asked to provide more detail on the staffing part of the cost estimates as well. Simply stating you'll need 90 additional FTE isn't going to be enough. I'd suggest adding more detail, though without knowing what information you have, I'm not sure what exactly to recommend.

p. 134, 221 & 257, Summary of Key Impacts of Implementing.... These sections should be written before the document goes to WASO.

p. 212 & 249, Environmentally Preferred Alternative. These sections need to be written before the document goes to WASO, and should have been available for regional review as well. Also, I don't see any placeholder for the environmentally preferred alternative for Alcatraz.

p. 223, Alternatives Applied to Muir Woods. Pulling Muir Woods out as a separate chapter doesn't make sense to me, and I find it confusing. If it were a stand-alone document for the separate national monument, I could see it, but it isn't. The "common to all" actions are combined with the rest of GOGA, the cost info is partially combined and partially separate. My suggestion would be to either a) make three chapters (1. Alcatraz, 2. rest of the park, 3. Muir Woods) or make it all one chapter.

Throughout. What do the different colors of highlighting mean?

Volume 2. I confess I didn't get beyond Volume 1.

Management zone booklet. The separate management zone booklet doesn't work. As a separate, different size document, it gets separated and lost almost immediately. I don't know where mine is any more, and the regional staff who have returned the GMP book to me with their comments haven't returned the booklet, so I'm guessing they didn't keep them together either. In addition, the small format makes it hard to grasp the full description of each zone, and even harder to compare among the zones.

Next steps - Brian and I talked today about the possibility of sending the current document on for WASO policy review, accompanied by a summary of regional comments or an errata section, or something like that. If we could get away with that, it would save us (meaning you!) months of time in addressing regional comments, making all the changes, checking everything, reviewing everything, getting it printed, and then having to do the same after WASO comments. I think this is only feasible if the regional comments are pretty minimal, and if the park and other members of the GMP team don't have too many things they were planning to fix in between versions. Since our conversations this afternoon, I've had a few more cautious thoughts, and am thinking that perhaps we should discuss this idea with the WASO planning office staff and see what they think before we commit to it. We definitely have a few holes to fill before sending them something - more detail on costs, add the environmentally preferred alternative analysis, add a boundary adjustment analysis, etc.

I'd be happy to give our WASO liaison an initial call, and see what the response is. They profess to be interested in ways to save time and money on GMPs - this would be one!

I told Brian I would send sample transmittal letters, as well as the things I've mentioned in this message. Bug me about it if I let it fall through the cracks.

Thanks for all your work on this. I'm very impressed with the park and public support that you've been able to maintain.

- Martha

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