

D18 (2510)

Memorandum

To: Regional Director, Pacific West Region

From: Associate Director, Park Planning, Facilities, and Lands

Subject: Golden Gate National Recreation Area and Muir Woods National Monument  
Draft General Management Plan and Environmental Impact Statement

We have reviewed the subject plan for consistency with National Park Service (NPS) policies and planning program standards. The plan is very thorough and has obviously been labor-intensive to create. Many of the proposed actions are exemplary and will serve the park and its visitors well for decades. Partnership efforts and improved transportation options for visitors in particular are noteworthy.

The plan meets many of the applicable NPS requirements; however, there are a few issues that must be addressed before the public draft can be released. These issues were discussed by staff from the Park Planning and Special Studies office in Washington and representatives of the planning team from the region and the Denver Service Center in mid November.

In addition to these official comments, several program areas provided more detailed suggestions that have been posted in the Planning, Environment and Public Comment (PEPC) system for the team's information. We request that you thoroughly review all comments posted in PEPC and make changes where appropriate. The planning team need not respond to all PEPC comments directly.

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**Facilities**

The Construction Management Division has noted that the team has done an excellent job of proposing reasonable capital improvement projects, compared to earlier projections at Golden Gate. Even so, the potential cost of all actions described is significant. The team has already included appropriate caveat statements regarding the timing and availability of funds, but it may be helpful to note also that some capital improvements may be built to a lesser degree than what is described in the preferred alternative, or developed in phases. For example, the Muir Woods off-site welcome center and entrance improvements could begin as a minimum investment; this initial effort may be the final product, or could be expanded to eventually meet the description in the plan. Please consider adding language to the plan that indicates the preferred alternative is written to describe the maximum potential capital improvements, and that lesser improvements may be implemented if necessary.

### Cost Estimates and Staffing Levels

While we believe that the park and planning team have actively worked to keep costs down, the numbers presented in the GMP are immense. The annual operating costs, staffing increases, and one-time improvement costs are summarized for Alcatraz, Muir Woods, and the park mainlands on pages 139, 274, and 228, respectively. In each case, the costs for the preferred alternative are supplied.

Nowhere in the document is there a total cost to NPS for the preferred alternative in all locations, however, and comparing and adding the discrete cost tables is difficult. We believe the total costs and staffing impacts are as follows:

	No-Action Alternative	Alternative 1	Alternative 2	Alternative 3	<b>Total, Preferred Alternatives</b>
Annual Operating Costs	\$28,030,000	<b>\$36,000,000</b>	\$34,090,000	\$35,630,000	<b>\$36,000,000</b>
Shuttle Ops	\$340,000	\$600,000-\$1,400,000	\$4,000,000-\$9,500,000	<b>\$600,000-\$1,400,000</b>	<b>\$600,000-\$1,400,000</b>
Staffing (FTE)	335	<b>(+90) 425</b>	(+68) 403	(+84) 419	<b>(+90) 425</b>
One Time Costs (Total)	\$10,460,000	\$185,420,000	\$151,800,000	\$184,770,000	<b>\$180,500,000</b>
Alcatraz	\$4,260,000	\$61,190,000	\$37,440,000	<b>\$54,380,000</b>	<b>\$54,380,000</b>
Marin, SF, SM	\$5,280,000	<b>\$67,940,000</b>	\$60,100,000	\$72,210,000	<b>\$67,940,000</b>
Marin, SF, SM common to all costs	\$0	<b>\$35,390,000</b>	\$35,390,000	\$35,390,000	<b>\$35,390,000</b>
Muir Woods	\$920,000	\$20,900,000	\$18,870,000	<b>\$22,790,000</b>	<b>\$22,790,000</b>

(preferred alternative bolded)

This table should be verified and inserted in the document where appropriate.

In addition, the references in Tables 6 and 21 on pages 139 and 274, respectively, are incorrect. They refer to the annual operating costs and staffing levels being in Table 8, but they are actually found in Table 12 on page 228. Table 12 on page 228 also contains an error in the number of existing FTE in the no action alternative. The table lists 355 FTE, but the text on page 156 lists 335 FTE. Please clarify and correct throughout the document.

### Park Collections

There is considerable discomfort and some confusion regarding the future of the park collections, as presented in the GMP. It is clear that the preferred alternative is a consolidated collections facility that would provide appropriate conditions for storing these resources, but this statement is buried in the last bullet on page 95. The fate of the collections in the no-action alternative, and under the preferred alternative until any new collections facility is created, is much less clear. It is our understanding that the park is in negotiations to use the Cavalry Stables to house

collections, but that those negotiations have been ongoing for some time and may not conclude affirmatively. The GMP offers no other viable alternative if these negotiations fall through, and during a conference call with park and region staff, there did not seem to be consensus on how the park could adequately protect collections resources without a new facility. Please consider what fall back plan is in place for collections, and determine how to publicize that plan in the GMP.

The plan contradicts itself on the impact of the no-action alternative on collections. On page 397 of Volume II, it is stated that “past and present actions that have resulted in the storage of the park collections in 15 different locations and under conditions that do not meet NPS standards have contributed to their degradation and potential loss, resulting in a significant adverse condition...” But the analysis of potential impacts on page 289 of Volume II reads, “continuation of current management...would be expected to have long-term, moderate, adverse impacts on park collections...there would be no impairment of park collections.” It is difficult to justify all these statements together. Either there are significant adverse conditions leading to degradation (and impairment), or there are moderate adverse impacts that do not lead to degradation and impairment. More attention needs to be paid to these determinations and consistency established throughout the document.

### **Management Zones**

The plan uses a novel format for describing the zones, by including a small format booklet embedded in the cover of the GMP. The benefit to readers (of being able to refer to the zones while reading each alternative) is significant. That structure, however, results in simplistic summaries of the management zones written on pages 54-55. These summaries need to be paired with the information in the booklet and on the following tables to understand the zones; combining multiple documents this way will prove challenging to readers, especially those who are viewing the document electronically. It is preferable to include a full description of the zones in chapter 2, and use the booklet for summaries or to repeat the zone information.

### **Boundary Adjustments**

The Lands Division correctly points out that the boundary adjustments described in the document beginning on page 64 are well justified and concise. It would be valuable for readers to understand how these properties could be added to the park, and Lands has requested that each potential addition include whether a legislative boundary change or a minor boundary adjustment is anticipated. Please see their review comments for specific recommendations for each parcel, in addition to general comments on land acreage in the park.

### **Cultural Resource Impacts**

Multiple reviewers noted that the impacts of removing or repurposing existing facilities may have a greater impact on cultural resources than is currently described in the impact analysis. In particular, the effects on archaeological resources need to be re-examined to determine that the likely impacts of deconstruction or renovation have been accurately captured.

### **Threatened and Endangered Species**

Nancy Brian has provided several ideas for the planning team and park staff to review in regard to T&E species. It appears there is some inconsistency between the document and other sources of information on this topic. Please review and work with Nancy to clarify as appropriate.

### **Redwood Creek Vision**

This description in the 'Common to all' section, beginning on page 98, seems misplaced. It is very different in scope from the other headings in the section, such as Trails, Transportation, Partnerships, etc. Other specific area management strategies are not described in this way. Consider moving this section to an appendix or clarifying what is different about Redwood Creek that requires it be included in this location.

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Please contact the Office of Park Planning and Special Studies when these concerns have been addressed. If you have any questions, please contact Mr. Tokey Boswell at 202/354-6901.

Once the revised draft has been approved in the regional office, please forward the following documents for clearance to print by the Directorate, to the Associate Director for Park Planning, Facilities, and Lands through the Office of Park Planning and Special Studies Program Manager, before printing the public review draft:

- 1) two copies of the revised document, production quality;
- 2) a document explaining or demonstrating how the issues presented in this memo have been addressed in the revised public draft GMP;
- 3) a briefing paper with a project summary that outlines any areas of special interest or potential controversy; and
- 4) an official memo from the Regional Director, Pacific West Regional Office, requesting clearance to print the public review draft.

Once the public review draft has been cleared to print, the regional office may proceed with the *Federal Register* process to publish a Notice of Availability.

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Keith Dunbar, PWRO  
Brian Aviles, GOGA  
Patrick Malone, DSC