



United States Department of the Interior

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D18 (DSC-P)
GOGA 73969

September 13, 2012

Memorandum

To: Regional Director, Pacific West Region

Through: Superintendent, Golden Gate National Recreation Area

Through: Planning and Compliance Chief, Pacific West Region

From: Project Manager, Planning Division, Denver Service Center

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

Subject: Project Agreement Amendment

This document outlines the need for amending the existing project agreement for the Golden Gate National Recreation Area and Muir Woods National Monument General Management Plan and Environmental Impact Statement (GMP). We request your approval of these budget and schedule changes. This amendment is required because the planning project has experienced time line changes and has exceeded initial cost projections due to changes in scope and unforeseen complexity of responding to public comments on the draft GMP. The initial project agreement was signed February 2006 and was amended in September 2009.

Revised Project Cost

With the incorporation of these changes, the total project budget would be raised to \$1,970,000. This would be an increase of \$296,000 over the current approved budget of \$1,674,000.

Revised Project Schedule

The project will be completed by February 2014.

Summary of Changes in the Planning Process and Schedule

The following paragraphs explain in detail the changes to the GMP work effort that have resulted or are expected to result in changes to schedule and cost. These include:

1. Revisions and additions to the GMP in preparation of publishing the draft GMP
2. Section 106 Programmatic Agreement
3. Complexity of public comment analysis on the draft GMP
4. Anticipated revisions and additions in preparing the final GMP
5. Factors affecting availability of staff

Changes since the 2009 project amendment:

- 1. Revisions and Additions to the GMP in Preparation of Publishing the Draft GMP:** Drafting and revising the draft GMP required additional time and cost that was not anticipated. Revisions and additional sections decided upon by the planning team were extensive, requiring a high level of coordination among team members and significant work from many subject matter experts. The following efforts lengthened the schedule and increased project costs.

Cost Revisions and Briefings – Initial submittal to WASO for clearance to print resulted in a request to evaluate, reduce, and prioritize costs of the preferred alternative along with other changes. This resulted in additional briefings to the regional director and director, and a second submittal of documents for WASO clearance to print. The first round occurred from December 2010 through March 2011, the second round from April to July 2011.

Editing/Formatting of the draft GMP – The large volume of the draft GMP was organized into four volumes, including a “Summary Edition.” The summary edition was vital to making the draft GMP proposals accessible. Coordinating four volumes increased the complexity of production, and resulted in a major editing and formatting effort for Denver Service Center (DSC) and the park. Additionally, a contractor was hired to perform a mechanical edit on the entire document.

- 2. Section 106 Programmatic Agreement:** The park requested DSC assistance to prepare an updated programmatic agreement for cultural resources that satisfies GMP National Historic Preservation Act (NHPA) section 106 compliance requirements. This major work effort, which requires multiple trips over a multi-year period and Advisory Council on Historic Preservation/State Historic Preservation Officer consultation, grew from a need for a more thorough description and assessment of potential effects on the park’s extensive cultural resources from implementing the preferred alternative. Intended to accompany the ROD, the new programmatic agreement will not only satisfy section 106 requirements for the GMP, but also greatly benefit the park in communicating historic preservation goals and streamlining future consultations with the State Historic Preservation Officer. A completed programmatic agreement will increase the efficiency of future planning and design efforts at GGNRA.
- 3. Complexity of Public Comment Analysis and Response on the Draft GMP:** The GMP planning team is currently responding to comments and discussing necessary changes to the document. As a large, urban national park unit with multiple distinct areas, urban pressures, and active constituent groups, the process for public comment and response have been proportionally more complex and lengthy than for a typical GMP. The expanded effort for comment analysis and response has extended the schedule and increased project costs.

Public Interest and Extended Comment Period – The level of public interest and comment on the draft GMP exceeded estimates, with several comments causing concern over the potential for legal challenge. Maintaining positive relationships with park partners and community groups is vitally important to GGNRA. The planning team is devoting special care to fully and sensitively address comments submitted by the public and partners. The draft GMP public comment period was extended one month to accommodate public and agency requests for additional time to comment on the draft document.

Quantity and Nature of Comments Received – The planning team received 540 correspondences, which included 2,400 unique comments. Unlike many plans, where one or two controversial issues drives the majority of public comment, the draft GMP elicited concerns spanning all geographic regions of the park, most major sections of the GMP, including the Background, Alternatives, Affected Environment, Environmental Consequences, and Consultation and Coordination chapters. Prior to the comment period, the planning team had expected comments to yield approximately 40—

50 concern statements. But in the course of comment analysis, the team (through a contractor) developed 194 distinct concern statements summarizing substantive comments. The effort required to address these comments has necessarily risen, involving multiple subject matter experts at the park and DSC.

For example, the GMP elicited a large quantity of public comment relating to the plan's effects on dog walking and birds (especially management of birds on Alcatraz Island). While many of the dog walking comments were not substantive to the GMP, and have been redirected to the dog management planning process, other comments fall within the scope of the GMP and are wide-ranging. These include comments relating to the purpose of the park, management zoning, and adequacy of the environmental analysis. In order to reduce the potential for litigation on the GMP, the team spent extra effort to ensure adequacy of these comment responses.

The draft GMP also elicited some lengthy letters from agencies and organizations, for example the San Francisco Public Utilities Commission and the Marin Audubon Society. Several organizations raised concerns about the level of environmental analysis, including cumulative impacts.

Contractor-related Changes – DSC contracted with the Louis Berger Group, Inc. (LBG) to complete the public comment analysis and response. However, due to complexity of the park and public comments (e.g., multiple issues, numerous park sites, multiple partner agencies, local politics and sensitivities), it has proved very challenging to accomplish comment analysis and response through a contractor. As a result, this has necessitated much more work for NPS personnel—both DSC and park staff. For example, coding comments and generating concern statements required extensive QA/QC. Furthermore, the contractor was not able to write nearly as many responses as planned.

In addition, the scope of the contract with LBG changed, resulting in a contract modification. The modification extended the schedule and expanded the level of effort needed for entering correspondences into PEPC and for coding a greater number of comments than specified in the original contract. The modification also added a task to create a “crosswalk” linking correspondences received with coded comments and related concern statements. This crosswalk provides clear documentation in the likely event that some commenters may request information about how their comments were addressed.

4. **Anticipated Revisions and Additions in Preparing the Final GMP:** Additional changes and additions to the draft FGMP are now anticipated as a result of the comment analysis and response process. Changes to the preferred alternative and resulting ripple effects in the environmental consequences, maps, and other sections continue to evolve and increase the effort that will be required to prepare the FGMP. The planning team also anticipates reorganizing the GMP to reduce the number of volumes from three to two. Changes to the formatting will also be made to ensure accessibility. The unanticipated complexity of the GMP extended the schedule and increased project costs.
5. **Factors Affecting Availability of Staff:** The DSC team experienced some turnover, requiring a small additional amount of time spent catching up on the project as well as an unanticipated trip by the new project manager. GGNRA management and planning staff have been impacted by some major events such as America's Cup and the 75th Anniversary of the Golden Gate Bridge. Collectively, these events caused extensions to the schedule and small increases to project costs.

Revised Milestone Schedule

Recent and Remaining Steps in the Project Schedule		
Tasks	2009 Project Agreement Completion Date	2012 Revised Completion Date
Completed region approval of the NPS preferred alternatives	Completed December 2008	
Completed team review draft GMP/EIS	Completed September 2009	
Completed park review draft GMP/EIS	December 2009	Completed April 2010
Completed region review draft GMP/EIS	March 2010	Completed July 2010
Completed WASO policy draft GMP/EIS	June 2010	Completed July 2010
Printed draft GMP/EIS	December 2010	Completed September 2011
Conducted public meetings on draft GMP/EIS	March 2011	Completed September 2011
Respond to public comments on draft GMP/EIS	N/A	September 2012
Complete team final GMP/EIS	September 2011	February 2013
Complete Section 106 programmatic agreement	N/A	March 2013
Complete park and region review of final GMP/EIS	December 2011	April 2013
Obtain WASO clearance to print final GMP/EIS	December 2011	June 2013
Print final GMP/EIS	April 2012	July 2013
Publish Record of Decision in Federal Register	August 2012	November 2013
Presentation Plan	August 2012	February 2014

We request your approval to the above as an amendment to the existing project agreement.

Tom Gibney
Project Manager

Agreed: **Barbara J. Johnson**
Digitally signed by Barbara J. Johnson
 DN: cn=Barbara J. Johnson, o=National Park Service,
 ou=Planning Division, email=barbara_j.johnson@nps.gov,
 c=US
 Date: 2012.09.14 08:17:40 -0600
 Barbara J. Johnson, Chief of Planning _____ Date
 Denver Service Center

Agreed: *Martha Crusius* 9-20-2012
 Martha Crusius, Regional Planning Chief _____ Date
 Pacific West Region

Agreed: *Frank Dean* 9/20/2012
 Frank Dean, Superintendent _____ Date
 Golden Gate National Recreation Area

Approved: *Christine S. Lehnertz* 9/24/12
 Christine S. Lehnertz, Regional Director _____ Date
 Pacific West Region

for

Concurred: *Patrick Gregerson* 10/01/12
 Patrick Gregerson, Program Manager _____ Date
 WASO Park Planning and Special Studies

Attachment – Background Financial Information

Summary of 409 Funding for GGNRA GMP (Historical and Projected)			
Fiscal Year	409 Funds through DSC	409 Funds through PWR	Accomplishments/Products
2002	\$ 6,086	\$ -	Project Initiation, Planning Strategy, Background and Data Gathering
2003	4,018	-	
2004	25,866	15,000	
2005	73,432	-	
2006	186,707	836	
2007	246,360	4,998	Project Agreement, Internal Scoping, Scoping Newsletter, Partner Workshops, Public Scoping Meetings
2008	297,919	7,486	GIS Resource Data, Alternatives Development
2009	256,268	9,986	Alternatives Completed, User Capacity Workshops, Public and Partner Meetings on Alternatives, CBA
2010	180,286	9,955	Preferred Alternative Identified, Team Draft GMP/EIS
2011	190,425	4,997	Park and Region review of DGMP/EIS*
2012 (projected)	165,000	0	WASO Review of DGMP/EIS*, Printed DGMP, Public and Partner Meetings on DGMP
2013 (projected)	179,012	5,000	Public Comment Period (extended 30 days)*, Analysis and Response to Public Comments*
2014 (projected)	95,436	5,000	Section 106 Programmatic Agreement*, Revisions to GMP*, Team Final GMP*, Review of GMP by Park/Region/WASO*, Print FGMP/EIS, NOA for FGMP
TOTAL	1,906,815	63,259	ROD*, NOA for ROD, Presentation Plan
TOTAL 409 Funds through DSC and PWR	\$ 1,970,074		

*Tasks identified as ones where the work effort has changed since the 2009 Project Agreement.

Please note: While not quantified in this project agreement, GGNRA has provided tremendous support throughout this project to ensure its success. This includes thousands of staff hours; funding for some contracts; and use of materials, space, and technology throughout the project. GGNRA has exhibited ownership of the plan throughout (e.g., writing significant portions of the document, providing leadership and technical support, managing public involvement and consultation, etc.). Additionally, the Golden Gate Parks Conservancy has contributed staff and volunteer time as well as materials and facility use.

Cost Saving Measures

PWR, GGNRA, DSC, and WASO agreed to the following changes to the project to reduce costs in FY13 and FY14: reduced number of printed final GMP copies (now 180 printed, 500 CDs; -\$15,000), a contribution by the Washington Office to cover editing costs in FY13 (-\$15,800), and a planned reduction in the LBG comment analysis contract amount for reduced work effort in FY13 (anticipated to be -\$5,100).

Recent Contracting History			
Fiscal Year	Amount	Contractor	Contract Objective
2010	\$ 14,500.64	Cardno TEC, Inc.	Editing Support for DGMP/EIS. A mechanical edit of the DGMP before printing.
2011	23,305.49	The Louis Berger Group, Inc.	Comment Analysis for DGMP/EIS.
2012	-	The Louis Berger Group, Inc.	Modification 1 of Comment Analysis Contract. Provides clarification on NPS reviews and updates the schedule.
2012	7,428.00	The Louis Berger Group, Inc.	Modification 2 of the Comment Analysis Contract. Extends the schedule and expands the level of effort needed for entering correspondences into PEPC and coding a greater number of comments. Adds a task to create a crosswalk between correspondences received and coded comments.

Please note: These contracts were obligated and paid through 409 funds; amounts are included in the Summary of 409 Funding table.