



United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Building 201, Fort Mason
San Francisco, CA 94123-0022

IN REPLY REFER TO:

W30 (GOGA-VRP)

Memorandum

To: Laura E. Joss, General Superintendent

From: David Schifsky, Chief Park Ranger

DAVID SCHIFSKY
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SCHIFSKY
Date: 2020.06.17 13:28:55 -07'00'

Subject: 2020 Superintendent's Compendium Changes

The National Park Service's regulations in 36 C.F.R. Parts 1 through 7 allow superintendents to adopt park-specific public use restrictions when needed to protect public health and safety, environmental and scenic values, and cultural and natural resources; and to implement management responsibilities, equitably allocate use of park areas, and avoid visitor use conflicts. The public use restrictions for each park are compiled in a compendium that is available to the public.

Law enforcement staff at Golden Gate National Recreation Area (the park) recently completed a comprehensive review of the park's Compendium. We consulted with other park divisions, including the resources management division, to determine whether any changes were needed to protect resources, public health and safety or to address visitor use concerns. Based on this review, we are proposing the following changes for the park's 2020 Superintendent's Compendium. A written explanation for each change is provided. The changes are grouped by category for simplicity.

Under 36 C.F.R. §1.5, public use restrictions that do not significantly alter public use patterns, adversely affect park resources, require changes to resource management objectives, or that are not highly controversial may be adopted by the Superintendent in accordance with the public notice requirements of 36 C.F.R. §1.7. As explained below, none of the proposed changes trigger these factors. If you concur, these changes can be adopted immediately in the park's Compendium following completion of the associated National Environmental Policy Act (NEPA) process.

As part of our review of the Compendium, we also made editorial and technical corrections to the document. We reorganized the document for clarity. We also corrected trail names to conform to current trail names (e.g., the trail between the SCA Trail and Old Fisherman's Trail is now the Coastal Trail). Technical and editorial corrections of this nature are not addressed below.

1. Visitor Center and Day Use Hours

A. Visitor Center Hours

The 2020 Compendium expands visitor center hours at Fort Point National Historic Site and adds visiting hours for the newly opened Visitor Center on the Presidio. These rules would not significantly alter public use patterns, nor would they affect cultural and natural resources.

B. Day Use Hours

The Compendium would increase opening hours at Muir Beach, Muir Beach Overlook and Stinson Beach by 3 hours each day. These areas would open at 6 a.m. rather than 9 a.m.

The opening hours for Muir Woods National Monument have been clarified. Rather than closing one hour after sunset, the Monument would close in accordance with posted hours which vary throughout the year but generally correspond with closing after sunset.

These minor changes to day use hours would not substantially alter visitor use patterns in these locations nor would they result in different types of visitor use. No impacts to park resources are anticipated.

2. Parking Lot Closures & Restrictions

The Compendium corrects the parking closure status for several parking lots (e.g., Baker Beach, Battery East, Navy Memorial) by moving the closure from the “Day Use” section to the “Parking” restriction section. The prior Compendium inadvertently included these parking lot closures under the Day Use section, which effectively closed these areas to all forms of public use at night. Staff believe that parking restrictions (as opposed to blanket public use restrictions) are sufficient to manage these parking lots.

In addition, the closure times for these parking lots has been clarified and standardized. The prior Compendium closed all parking lots to overnight parking and camping except vehicles displaying backcountry camping permits. The parking lots at Battery East, Merrie Way, Navy Memorial and Ocean Beach would now be closed to parking from one hour after sunset to 6 a.m. These parking lots would therefore close several hours earlier, particularly during winter months. However, these areas do not receive heavy use after dark. Closure of these areas to parking at night enhances public safety and resource protection by reducing opportunities for illegal vehicle camping and other vehicle-based illicit activity. Because these closures only prohibit vehicle parking, the restrictions should not be controversial and are narrowly tailored to address concerns related to illegal, vehicle-based, nighttime activity.

The 2020 Compendium would also explicitly include a defined nighttime parking lot closure at Crissy Field East Beach parking lot starting at 11 p.m. every night until 6 a.m. each morning. Park staff believe that a later closing time at East Beach is warranted due to the higher visitor use levels in the evenings and after work in this part of Crissy Field. Closing East Beach parking lot

at 11 p.m. allows visitors, including joggers, dog walkers and board sailors, ample time to finish their recreational activities and remove their vehicles from the parking area prior to closure of the parking lot. This parking lot was closed to overnight parking and camping under the prior Compendium. Adopting a defined closure time of 11 p.m. will reduce use of this area for illegal overnight parking, including by people who sleep in or live in their vehicles, and aid our ability to enforce the overnight parking ban in this location. Additionally, this 11 p.m. closure time is consistent with the current 11 p.m. closure time of the Crissy Field West Bluff parking area.

These changes in parking closure times will not substantially alter public use patterns because the prior compendium already prohibited unpermitted, overnight parking. In addition, the closure times for each parking lot allow normal visitor use patterns to continue by giving visitors sufficient time to conclude recreational activities, pack up their gear and remove their vehicles from the affected parking lots. The closures are also narrowly tailored to address concerns associated with illegal overnight parking. As a result, these changes should not be controversial. Establishing fixed parking closure hours in these areas would not adversely affect park resources and may instead enhance our ability to protect park resources by limiting illicit vehicle-based uses in these areas and preventing vehicle-based camping.

The 2020 Compendium would add parking restrictions in the southern portion of the Fort Funston parking lot. Approximately 13 stalls adjacent to the National Park Service (NPS) maintenance areas, native plant nursery and San Francisco Unified School District (SFUSD) permitted areas would be signed for NPS administrative and park partner use only. The public would also be prohibited from parking in 20 stalls adjacent to the group campsite that has been permitted to San Francisco Unified School District. Public parking in this latter location would only be prohibited on weekdays during the school year, thus making the spaces available for public use on weekends and during the summer. These parking restrictions affect only a small portion of the total available parking at Fort Funston. For example, the southern satellite parking lot at Fort Funston has more than 40 parking spaces. The main Fort Funston parking lot has over 200 spaces. Moreover, the 20 parking spaces near the group campground would be available for public use on weekends and during the summer recess, thus limiting the effect of this restriction on other forms of public use at Fort Funston. Reserving a limited number of parking spaces for NPS administrative vehicles, nursery and volunteer staff, and SFUSD youth environmental education programs enhances our ability to support important administrative, interpretive and educational programs. These parking changes should not be controversial because ample opportunities for access to the site remain.

The Compendium would incorporate the new parking reservation requirement at Muir Woods National Monument. The park solicited public input on this requirement through the Muir Woods Reservation System Environmental Assessment and Finding of No Significant Impact. The reservation requirement went into effect in mid-January 2018. The reservation system has allowed the park to substantially improve the flow of vehicles into and out of Muir Woods and reduce public safety and resource concerns associated with circling vehicles and illegal road shoulder parking.

3. Unmanned Aircraft

Based on consultations with natural resources staff, the unmanned aircraft area in Marin County along Shoreline Highway would be closed seasonally from February 1 – July 31 to protect raptors from disturbance during the nesting season. The area would remain open to unmanned aircraft use the rest of the year. Park visitors who fly unmanned aircraft could relocate to the park's other unmanned aircraft location at Fort Funston, which would remain open during these months subject to local conditions when hang-gliders are not in the air. This closure only affects unmanned aircraft use. It does not substantially change visitor use patterns on park lands in Marin County. Because this closure is limited in time and narrowly tailored to protect raptors, it should not be controversial. Alternate sites are available for this activity during the seasonal closure.

4. Public Use Closures

Rodeo Lake and Rodeo Lagoon: The 2020 Compendium proposes to retain the rules from the 2017 Compendium for these areas rather than closing these areas to all public use as proposed in 2019. As per the 2017 Compendium, these areas would remain closed to swimming, wading, boating, and fishing. The 2017 Compendium (at p. 24) also closed both Rodeo Beach Lagoon and Rodeo Lake to pets. The pet closures for these two waterbodies would be retained in the 2020 Compendium.

Redwood Creek: The 2020 Compendium would retain the 2017 Compendium's public use closure of Redwood Creek and its seasonal inlet between the creek and the ocean, rather than expanding the public use closure to 40' from the centerline of the creek on either side. The NPS will monitor public use in this area. If monitoring indicates that public use is adversely affecting natural resources, NPS will explore options to mitigate or prevent impacts (e.g., educational signage, vegetative barriers, fencing) and conduct appropriate compliance.

Oakwood Valley Pond: The 2020 Compendium does not propose a public use closure for this pond. The pond itself does not receive high levels of use. Should use levels change, NPS would explore options to mitigate or prevent impacts (e.g., educational signage, vegetative barriers, fencing) and conduct appropriate compliance.

Milagra Ridge: The 2020 Compendium does not propose to close areas adjacent to Milagra Ridge Road, Milagra Summit Trail and Milagra Battery Trail to public use. Should use patterns change, NPS would explore options to mitigate or prevent impacts (e.g., educational signage, vegetative barriers, fencing) and conduct appropriate compliance.

5. Boating Closures

Alcatraz Island Marine Closure: The 2020 Compendium would include a seasonal, public boating closure of the waters within 300' of the shoreline of Alcatraz Island. This closure was identified in the park's GMP in order to protect sensitive habitat for nesting seabirds from February 1 to September 15 of each year. (See GMP, volume 1, page 227.) There is little

pleasure craft use this close to the island. Commercial fishing is also prohibited in this area under 36 CFR 2.3. The docking or landing of any boat, except in an emergency or by NPS authorized vessels, is currently prohibited under 36 C.F.R. §7.97(a). As a result, this seasonal closure would not substantially alter public boating patterns around the island, nor is it expected to be controversial.

Bonita Cove and Bird Rock: The park's GMP identified the need to close Bonita Cove and a 300' area around Bird Rock to protect sensitive resources such as harbor seals and breeding and roosting seabirds. The prior Compendium included a closure for Bonita Cove and its tide pools, but the accompanying map did not clearly depict this marine closure. Similarly, Bird Island was depicted as closed but not the marine area within 300' of the island. The 2020 Compendium corrects the map for Bonita Cove by depicting the cove as closed to boating. The 2020 Compendium adds a boating closure for the marine area within 300' of Bird Rock and depicts the closure on the accompanying map. These marine areas are accessible by boat but receive little boating use. Therefore, closure of these areas would not significantly change public use patterns. This action should not be controversial because it is narrowly tailored to protect important habitat for native species.

6. Vaping and Tobacco

The 2020 Compendium would restrict the areas in which Electronic Nicotine Delivery Systems (ENDS) devices (e.g., vape pens) could be used. This restriction is consistent with NPS policy and with the park's existing restrictions on tobacco use. The Compendium also restricts smoking within 25' of building entrances to protect the health and safety.

7. Dog Walking

A. Voice Control Dog Walking Areas

Crissy Field: Voice Control dog walking in this area is more expansive than what was available in 1979. At that time, the area of Crissy Field permitted to NPS by the Army and open to Voice Control dog walking only included the shoreline and parallel path from the eastern boundary to just past the former U.S. Coast Guard station. Like the 2017 Compendium, the 2020 Compendium expands beyond this to include areas not managed by NPS in 1979. Voice Control dog walking would therefore continue on Crissy Airfield, central beach and east beach, the promenade, grassy flat areas in the southeast portion of the site, and seasonally in the wildlife protection area.

Even though the Crissy Field Voice Control area is larger than what was available in 1979, the areas open to Voice Control dog walking consist primarily of beach and grassy areas that are resilient enough to handle this type of managed use. Voice Control dog walking has also been allowed in these areas for many years. As a result, there would be no change in visitor use patterns if this use were to continue. Adverse impacts to resources are not anticipated because the tidal marsh and other sensitive resource areas are fenced. In addition, the wildlife protection area is closed to Voice Control seasonally pursuant to 36 C.F.R. §7.97.

Fort Funston: Dogs would be prohibited in the limited and designated NPS administrative and Park partner area comprising the NPS native plant nursery, NPS law enforcement and maintenance buildings, and the area permitted to the SFUSD (which includes one building and the area immediately surrounding it and adjacent parking spaces). This area would be closed to dogs in order to reduce the incidences and potential of dog bites and dog conflicts with NPS employees, maintenance and nursery operations, and SFUSD staff, parents and school children. The area that would be closed to dogs at Fort Funston is comprised of buildings, a nursery operations area, a maintenance area, grounds immediately surrounding these areas and associated parking stalls that are not suitable for off-leash dog walking. Moreover, the primary destination for dog walkers in the Fort Funston area is the beach and coastal bluffs to the north and west of this proposed closure area.

These restrictions at Fort Funston would not adversely affect park resources or require modification to the park's resource management objectives. Given the small-scale nature of these changes, the proposed changes are not deemed highly controversial; they are narrowly tailored to accomplish park management goals such as avoiding visitor use conflicts with unleashed dogs and providing enhanced public safety by requiring dogs to be leashed in parking areas.

B. Commercial Dog Walking

The Compendium would continue to require commercial dog walkers to obtain a permit and limit commercial dog walkers to walking no more than six (6) dogs at one time. This restriction has been in the Compendium since 2014. It was originally included in the Compendium as an interim restriction pending completion of the Dog Management Plan/EIS. With the termination of the Dog Management Plan process, staff recommend that the commercial dog walking permit program be retained in the new Compendium.

Because large groups of off leash dogs are simply harder for one person to control, they pose an increased risk of resource damage and visitor use conflicts. The Commercial Dog Walking permit program has reduced visitor use conflicts from the large number of unleashed dogs that commercial dog walkers formerly brought to popular Voice Control areas.

There has been a high degree of compliance with the park's permit program, indicating that it is not controversial. Limits on commercial dog walking have also been adopted by many local jurisdictions, further reflecting the now widespread understanding of the importance of regulating the numbers of dogs walked by commercial dog walkers.

8. Areas for Demonstrations and Distribution of Printed Matter

In accordance with 36 C.F.R. §§2.51(c), the Compendium identifies areas that are available for these types of First Amendment activities. The Compendium identifies the reasons for selecting these locations.

9. Memorialization

The Compendium would remove the permit requirement for spreading cremains provided that the activity conforms to other Compendium conditions. The Compendium expands the distance for the spreading of human ashes from roads, trails, developed facilities and interior water bodies from 10 yards (or 25 in the case of water bodies) to 100 yards. This provision would not substantially alter public use patterns because the scattering of ashes would still be allowed, albeit in reduced areas. Removal of the permit requirement would not adversely affect the park's water resources because the Compendium still prohibits the scattering of ashes in park waters.

10. E-bikes

Secretarial Order 3376, dated August 29, 2019, seeks to increase recreational opportunities on lands managed by the Department of the Interior by enhancing opportunities for the use of electric bicycles (e-bikes). Pursuant to Order 3376, the National Park Service issued Policy Memorandum 19-01 on August 30, 2019, which defines e-bikes and states:

E-bikes are allowed where traditional bicycles are allowed. E-bikes are not allowed where traditional bicycles are prohibited, including wilderness areas. Except on park roads and other locations where use of motor vehicles by the public is allowed, operators may only use the power provided by the electric motor to assist pedal propulsion of an e-bike. The intent of this policy is to allow e-bikes to be used for transportation and recreation in a similar manner to traditional bicycles.

The Policy Memorandum allows superintendents to limit, restrict or impose conditions on the use of e-bikes under the authority in 36 CFR 1.5(a)(2), which authorizes superintendents to designate areas for a specific use or activity, or impose conditions or restrictions on a use or activity.

The 2017 Compendium includes a list of routes closed to traditional bikes ("Closed Routes") and a list of routes open to traditional bikes ("Open Routes"). In response to the Secretarial Order and the Policy Memorandum, park staff reviewed the Closed and Open Routes to determine whether to allow e-bike use of these routes.

Traditional bikes are prohibited on the Closed Routes due resource and public safety concerns (e.g., narrow trails, erosion prone areas, steep drop offs, cultural resources, congestion and visitor use conflicts). These same considerations apply to the use of e-bikes. Park staff recommend no change in status as to the Closed Routes, meaning that e-bikes would not be allowed on the Closed Routes.

Park staff also reviewed the 2017 Compendium's list of Open Routes. With a few exceptions as noted in the next paragraph, park staff is not aware of any information indicating that allowing e-bikes on these routes would cause any new or different resource impacts or public safety concerns compared to traditional bikes. E-bike users on these routes will be required to ride in groups of ten (10) or less, comply with the same speed limits as riders of traditional bikes, and comply with applicable sections of 36 CFR Part 4 and California State Law. These restrictions

are designed to protect public safety and park resources. The use of e-bikes is not anticipated to significantly alter public use patterns in these areas because these routes have been open to traditional bicycles for many years. We do not anticipate the use of e-bikes on these routes to be highly controversial because these routes are already popular bicycle routes. Visitors using these routes are conditioned to sharing these routes with other user groups.


Park staff recommend that several routes open to traditional bicycles only be open to limited e-bike use. Some of these trails would be opened to e-bikes only in the downhill direction because of possible safety concerns of uphill traffic traveling at increased speeds. Additionally, some of these trails are restricted to Class 1 and 2 e-bikes which remains consistent with adjacent class restrictions on state park lands; it makes sense to have consistent visitor use restrictions on trails that span both NPS and state park lands.

Consistent with Policy Memorandum 19-01, NPS staff will monitor resources and visitor use patterns to determine whether there are any unanticipated changes as a result of e-bike use. Should such changes occur, GGNRA may impose additional restrictions on e-bike use using the Superintendent's authority under 36 CFR 1.5.

I concur:

LAURA JOSS

Laura E. Joss
General Superintendent

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Date